

In the Matter of Cory Curtis Cape May County Sheriff's Office

CSC DKT. NO. 2018-2916 OAL DKT. NO. CSR 06346-18 FINAL ADMINISTRATIVE ACTION
OF THE
CIVIL SERVICE COMMISSION

**ISSUED: APRIL 24, 2019** 

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The appeal of Cory Curtis, County Correction Officer, Cape May County Sheriff's Office, removal effective August 10, 2017, on charges, was heard by Administrative Law Judge Kathleen M. Calemmo, who rendered her initial decision on March 28, 2019. No exceptions were filed.

Having considered the record and the Administrative Law Judge's initial decision, and having made an independent evaluation of the record, the Civil Service Commission (Commission), at its meeting of April 24, 2019, accepted and adopted the Findings of Fact and Conclusion as contained in the attached Administrative Law Judge's initial decision.

## ORDER

The Civil Service Commission finds that the action of the appointing authority in removing the appellant was justified. The Commission therefore affirms that action and dismisses the appeals of Cory Curtis.

This is the final administrative determination in this matter. Any further review should be pursued in a judicial forum.

DECISION RENDERED BY THE CIVIL SERVICE COMMISSION ON THE 24<sup>th</sup> DAY OF APRIL, 2019

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Chairperson

Civil Service Commission

Inquiries and Correspondence

Christopher S. Myers
Director
Division of Appeals and Regulatory Affairs
Civil Service Commission
P. O. Box 312
Trenton, New Jersey 08625-0312

Attachment



## **INITIAL DECISION**

OAL DKT. NO. CSR 06346-18 AGENCY DKT. NO. N/A 2018-2914

IN THE MATTER OF CORY CURTIS,
CAPE MAY COUNTY
SHERIFF'S DEPARTMENT.

Cory Curtis, appellant, pro se

Kyle D. Weinberg, Esq., for respondent (Blaney & Karavan, attorneys)

Record Closed: February 13, 2019 Decided: March 28, 2019

BEFORE KATHLEEN M. CALEMMO, ALJ:

#### STATEMENT OF THE CASE

Appellant Cory Curtis (appellant or Curtis), a Corrections Officer with respondent Cape May County Sheriff's Office (respondent or County), appeals from disciplinary action removing him from service. By Final Notice of Disciplinary Action (FNDA), respondent charged Curtis with conduct that violated: N.J.A.C. 2C:12-1(a)(1), assault; N.J.A.C. 4A:2-2.3(a)(6), conduct unbecoming a public employee; N.J.A.C. 4A:2-2.3(a)(12), other sufficient cause; N.J.S.A. 40A:14-147, administrative misconduct; and Cape May County Sheriff's Office (CMCSO) Rules and Regulations 4.1.1, standard of conduct and CMCSO 4.1.12, obedience to laws and regulations. The allegations relating

to these charges involve appellant's behavior while off duty at the Borgata Casino Hotel (Borgata) in Atlantic City, New Jersey. Appellant does not deny the behavior, but contends that because of his otherwise impeccable record, removal is too severe a penalty. In further support, he contends that the charges against him did not involve an allegation of dishonesty and he was never convicted of a crime. The disorderly persons offenses against him for criminal mischief were dismissed and the simple assault offense was part of plea deal that was conditionally dismissed. Therefore, Curtis maintains that removal is not warranted in this instance.

#### PROCEDURAL HISTORY

On April 13, 2018, appellant filed a Law Enforcement Officer & Firefighter Removal Appeal requesting the matter be transferred to the Office of Administrative Law (OAL) to be heard as a contested case. His appeal was filed at the OAL on April 25, 2018. By letter dated June 25, 2018, appellant waived the 180-Day Rule, codified at N.J.A.C. 4A:2-2.13(g) and N.J.S.A. 40A:14-201(a). Thereafter, appellant terminated his legal services relationship with his attorney and represented himself. At a telephone status hearing on October 17, 2018, appellant requested an adjournment of the hearing dates scheduled for November 5, 2018 and November 8, 2018. Appellant confirmed that he was waiving his rights to have his appeal finally decided within 180 days of the filing date and waiving his right to go back on the County's payroll. The hearing was held on January 3, 2019 and the record remained open for post hearing submissions. The record closed on February 13, 2019.

### **FACTUAL DISCUSSION**

On August 2, 2017, Curtis was issued a Complaint and Summons for two counts of criminal mischief in violation of N.J.S.A. 2C:17-3A for damaging personal property belonging to the Borgata on July 30, 2017, by breaking a pallet of decorative marble tiles and damaging a security camera. (R-A.)

On August 2, 2017, Curtis was also issued a Complaint and Summons for committing simple assault by attempting to cause or purposely, knowingly, or recklessly causing bodily injury to victim, James Walicky, by causing injury to the victim's ribs, back, left knee, and left eye, in violation of N.J.S.A. 2C:12-1(a)(1), a disorderly persons offense. (R-B.)

On November 3, 2017, as part of a plea deal for a one-year conditional dismissal, Curtis entered a plea of guilty in Atlantic City Municipal Court for simple assault and agreed to make restitution of \$5,000 to the Borgata for the destruction of property. As of November 14, 2018, Curtis met the terms of the conditional dismissal. (P-C.)

## **Testimony**

### For respondent

James Walicky (Walicky) was working as an outside heavy porter during the 12:30 a.m. to 8:30 a.m. shift at the Borgata on June 30, 2017. While performing his duties, Walicky drives a clearly marked Borgata truck. Prior to the incident in issue, Walicky parked his truck in the valet exit area to tend to some trash. When he returned to his truck, he saw an adult male sitting in the driver's seat. Walicky approached the truck and told the man to get out. He threatened to call security if the man did not comply. Walicky testified that the man started to play with the steering wheel, like a child, but he complied and got out of the truck. As soon as the man left, Walicky inspected the truck for damage. Finding no damage, Walicky did not feel the need to report the incident as he thought the man would leave the area. There was no reason for any of the casino guests to be in this area of the property.

After Walicky finished cleaning the area, he noticed a pallet of broken tiles behind his truck. The man he had confronted earlier was standing nearby and Walicky asked him if he was responsible for the mess. At that point, Walicky knew he had to make a report. As he entered the employees' entrance, he felt two hands on his shoulders. When

he turned around and noticed who it was, Walicky attempted to shove the man back through the doors. As soon as Walicky realized that the doors did not open outward, he attempted to run and yelled for help. The man jumped on Walicky and threw him to the ground and there was a scuffle. Walicky lost his cell phone in the fall and the man was now standing over him causing Walicky to fear for his own life.

A co-worker heard Walicky's screams for help and came to his aid. The man was able to run away before security and the police arrived. Walicky identified his attacker after looking at surveillance footage. He also identified Curtis, who was sitting at the appellant's table at the hearing, as the man who was sitting in his truck and later attacked him.

Walicky was initially unwilling to press charges because he was fearful of retribution from Curtis. He believed during the attack that Curtis was trying to kill him. On August 2, 2017, Walicky signed the Complaint against Curtis for assault. (R-B.)

Video footage from Borgata's surveillance cameras was played during Walicky's direct testimony. (R-E.) The video surveillance depicted Curtis pulling a pallet of tiles out a door that tipped over as Curtis attempted to go up a curb. This occurred behind Walicky's truck. Another surveillance camera captured Curtis attacking Walicky from behind. Curtis is seen running up behind Walicky and jumping on his back throwing him to the ground. Walicky believed that the video did not capture the entire encounter.

On cross-examination, Walicky stated that he did not lock his truck when he left it to clean the area. Walicky did not initially call security because there was no damage to report.

Kourtney Perry (Perry) has been employed by the County for thirteen years. She is currently a Detective First Class with the Cape May Sheriff's Office and she conducted the internal affairs investigation of Curtis. On August 2, 2017, Curtis notified the County that he had been issued three Summons due to an incident at the Borgata. The

investigation began after Curtis informed the County of his pending charges in Atlantic City.

On August 10, 2017, Perry went to the Borgata, watched the video, and drafted a report. She recognized Curtis as the man in the video. Perry observed a scene in the video showing Curtis reaching up to dismantle a security camera that caused the screen to go black. She also observed Curtis entering a secured area and coming out pulling a pallet stacked with marble tile. Curtis pulled the pallet over a curb, causing it to turn over and shatter the tiles. Finally, she observed Curtis going through double doors pushing an employee to the ground and jumping on top of him. Perry deemed the behavior to be unusual, so she recommended that Curtis be given a reasonable suspicion drug test. The results of the test were negative.

Due to Curtis' criminal charges and Perry's investigation report, the County Warden signed a Preliminary Notice of Disciplinary Action (PNDA) suspending Curtis. (R-D.)

As part of her investigation, Perry reviewed Borgata's incident report (R-F), the Summons and Complaints issued against Curtis (R-A and R-B), and the plea agreement of the conditional dismissal of the charges. On April 6, 2018, Perry prepared a final report. (R-G.) On April 9, 2018, the County's Executive Undersheriff issued the FNDA removing Curtis from his duties. (R-H.) Perry testified that due to Curtis' behavior and his actions on June 30, 2017, she believed that removal was warranted.

On cross-examination, Perry stated that Curtis had not been involved in any past trouble with the County. Perry never interviewed Curtis in connection with her investigation.

**Ellen Loughney** (Loughney) is the Manager of the Security Department's Municipal Court cases for the Borgata. On August 2, 2017, Loughney received emails from Borgata's Director of Security regarding the incident involving Curtis. Loughney was

asked to investigate whether Curtis was law enforcement. She reviewed all the video footage of the incident.

Loughney attended the Municipal Court hearings and was present on November 13, 2017, when Curtis entered his plea. Curtis entered a guilty plea to simple assault and agreed to pay the Borgata \$5,000 for the broken tile. As part of the Conditional Dismissal Program, the two criminal mischief charges would be dismissed after the restitution was paid and the assault charge would be dismissed after one year. Loughney confirmed that the restitution check of \$5,000 was received.

**Donald Lombardo** (Lombardo) is employed by the County as Warden of the County's correctional facility. He held this position for over nine years. Lombardo's duties include administration, operation, and maintenance, as well as, protection and custody of the inmates.

Lombardo stated that all sheriff's officers are responsible for obeying the CMCSO Rules and Regulations. (R-I.)

On August 9, 2017, Curtis submitted a Special Report to Lombardo informing him that he had charges pending against him in Atlantic County. (R-J.) Lombardo was required to initiate an internal affairs investigation. As part of the investigation, Lombardo reviewed the surveillance video from Borgata. Lombardo was disturbed by the images he saw. As a sheriff's officer, Curtis is held to a higher level of accountability. Lombardo was particularly concerned that Curtis would attempt to dismantle a security camera knowing that these cameras play an integral role in maintaining safety, security, and accountability in the corrections facility. Lombardo felt that Curtis' actions spoke to his character and reflected negatively on his ability to be honest. According to Lombardo termination was the appropriate penalty.

### For appellant

**Cory Curtis** did not offer any testimony but introduced documents into evidence attesting to his character:

- Letter dated May 22, 2018 from the Cape May Prosecutor thanking him for his help in securing a conviction (P-A);
- 2. Perfect attendance commendation for 2016 (P-B);
- 3. Disposition summary of his conditional discharge (P-C); and
- 4. Resolution from the County Freeholders (P-D).

## **ADDITIONAL FINDINGS OF FACTS**

Walicky was the only witness to testify as to the incident of June 30, 2017. Walicky testified in a straightforward, credible manner without embellishment. He expressed genuine fear of Curtis, but without exaggeration or hysterics. It should be noted that no competent, credible evidence was introduced disputing Walicky's version of the events that took place on that date. Walicky's testimony was consistent with the video surveillance viewed during the hearing. Although Walicky maintained that the video did not capture the entire attack, there is no doubt that the attack against Walicky was unprovoked and that Curtis was the attacker. I therefore FIND as FACT and adopt Walicky's description of the events of that day describing Curtis' conduct and behavior. I also FIND in accordance with Walicky's testimony and the surveillance video that Curtis' assault of Walicky was without provocation or justification.

Lombardo, as the Warden of the facility, was required to investigate the criminal charges against Curtis. He assigned Perry to conduct the investigation. Perry conducted her internal investigation in a straightforward, credible and unbiased manner. I FIND that Lombardo and Perry had good cause to be concerned about what they saw on the surveillance video that depicted bizarre and criminal behavior by Curtis. I further FIND that neither Lombardo nor Perry showed any signs of bias against Curtis. I adopt their

unrefuted testimony regarding the seriousness of the incident and how Curtis' behavior undermined the standards of conduct expected of a sheriff's officer for the County.

## **LEGAL DISCUSSION AND CONCLUSION**

Under the Civil Service Act, a public employee may be subject to major discipline for various employment-related offenses, N.J.S.A. 11A:2-6. In an appeal from a disciplinary action or ruling by an appointing authority, the appointing authority bears the burden of proof to show that the action taken was appropriate. N.J.S.A. 11A:2.21; N.J.A.C. 4A:2-1.4(a). The authority must show by a preponderance of the competent, relevant and credible evidence that the employee is guilty as charged. Atkinson v. Parsekian, 37 N.J. 143 (1962); In re Polk, 90 N.J. 550 (1982). When dealing with the question of penalty in a de novo review of a disciplinary action against an employee, it is necessary to reevaluate the proofs and "penalty" on appeal, based on the charges. N.J.S.A. 11A:2-19; Henry v. Rahway State Prison, 81 N.J. 571 (1980); West New York v. Bock, 38 N.J. 500 (1962).

The first charge against Curtis is for his conduct which violated N.J.S.A. 2C:12-1(a)(1) for assaulting Borgata employee, Walicky. As a sheriff's officer employed by the County, the County had a legitimate interest in Curtis' behavior while off duty at the Borgata. Employees of the State of New Jersey are governed by the Civil Service Act. N.J.S.A. 11A:1-1 et seq. The objectives of our civil service laws are articulated in N.J.S.A. 11A:1-2. They include separating "those whose conduct is less than adequate." City of Newark v. Gaines, 309 N.J. Super. 327, 332 (App. Div. 1998). Among other things, Curtis was charged with violating N.J.S.A. 2C:12-1(a)(1), simple assault, as detailed in the Complaint and Summons. (R-B.) On November 13, 2017, Curtis entered a plea of guilty to this charge in the Municipal Court of Atlantic City. Although the charge was subsequently dismissed as part of a conditional dismissal, Curtis remains accountable for his actions on June 30, 2017, and his behavior towards the victim, Walicky. Walicky, in his unrefuted testimony, described the assault and its impact on his daily life. The Borgata

surveillance camera captured the assault and it was reviewed and considered in the investigation against Curtis.

The County also charged Curtis with conduct unbecoming a public employee. N.J.A.C. 4A:2-2.3(a)(6). "Conduct unbecoming a public employee" is an elastic phrase, which encompasses conduct that adversely affects the morale or efficiency of a governmental unit or that has a tendency to destroy public respect in the delivery of governmental services. Karins v. City of Atlantic City, 152 N.J. 532, 554 (1998); see also In re Emmons, 63 N.J. Super. 136, 140 (App. Div. 1960). It is sufficient that the complained-of conduct and its attending circumstances "be such as to offend publicly accepted standards of decency." Karins, 152 N.J. at 555 (quoting, In re Zeber, 156 A.2d 821, 825 (1959)). Such misconduct need not necessarily "be predicated upon the violation of any particular rule or regulation but may be based merely upon the violation of the implicit standard of good behavior which devolves upon one who stands in the public eye as an upholder of that which is morally and legally correct." Hartmann v. Police Dep't of Ridgewood, 258 N.J. Super. 32, 40 (App. Div. 1992) (quoting Asbury Park v. Dep't of Civil Serv., 17 N.J. 419, 429 (1955)).

Appellant's status as a sheriff's officer in the County facility subjects him to a higher standard of conduct than ordinary public employees. <u>In re Phillips</u>, 117 N.J. 567, 576-77 (1990). A corrections officer represents "law and order to the citizenry and must present an image of personal integrity and dependability in order to have the respect of the public." <u>Township of Moorestown v. Armstrong</u>, 89 N.J. Super. 560, 566 (App. Div. 1965), <u>certif.</u> denied, 47 N.J. 80 (1966).

In the present case, Lombardo testified credibly that he was distressed by Curtis' behavior on June 30, 2017, but especially disturbed that Curtis would dismantle a security camera. Every sheriff's officer knows how vital security cameras are to the safety, security, and accountability of the correctional facility. For Lombardo, watching his sheriff's officer break a security camera, spoke to the heart of the matter and questioned Curtis' fitness for the job.

Therefore, I CONCLUDE that the County proved by a preponderance of the credible evidence that Curtis' conduct was unbecoming a public employee by his unprovoked assault of a Borgata employee and by his behavior in accessing a restricted area, attempting to remove and then break a pallet of marble tiles, and breaking a security camera to hide the evidence of his crime. I further CONCLUDE that Curtis' conduct violated the implicit standard of good behavior and the heightened standard of conduct for law enforcement officers.

Appellant has further been charged with violating N.J.A.C. 4A:2-2.3(a)(12), "Other sufficient cause." Specifically, Curtis is charged with violating CMCSO Rules and Regulations 4.1.1 (R-I):

STANDARD OF CONDUCT. Members and employees should conduct their private and professional lives in such manner as to avoid bringing the Sheriff's Office into disrepute.

He is also charged with violating CMCSO Rules and Regulations 4.1.12 (R-I):

OBEDIENCE TO LAWS AND REGULATIONS. Members and employees shall obey all Federal laws, State laws, and agency rules, regulations, policies or procedures.

Other sufficient cause is an offense for conduct that violates the implicit standards of good behavior which devolve upon one who stands in the public eye as an upholder of that which is morally and legally correct. In re MacDonald, CSR 9803-13, Initial Decision (May 19, 2014), adopted, Civil Service Commission (September 3, 2014), http://njlaw.rutgers.edu/collections/oal/. Appellant's conduct was such that he violated this standard of good behavior. I deemed that the testimony showed that Curtis engaged in an unprovoked attack upon a Borgata employee who was performing his regularly assigned duties. The testimony and the video surveillance showed that Curtis entered a restricted area and engaged in acts of criminal mischief by destruction of property. As such, I CONCLUDE that the County proved by a preponderance of the credible evidence

that Curtis violated CMCSO Rules and Regulations 4.1.1 by failing to conduct himself in a manner that presented an image of personal integrity and dependability to garner the respect of the public. I further **CONCLUDE** that the County proved by a preponderance of the credible evidence that Curtis violated CMCSO Rules and Regulations 4.1.12 by violating N.J.S.A. 2C:17-3(a)(1) and engaging in criminal mischief and by violating N.J.S.A. 2C:12-1(a)(1) in assaulting Walicky.

#### **PENALTY**

Once a determination is made that an employee has violated a statute, regulation, or rule concerning his employment, the concept of progressive discipline must be considered. W. New York v. Bock, 38 N.J. 500 (1962). However, it is well established that where the underlying conduct is of an egregious nature, the imposition of a penalty up to and including removal is appropriate, regardless of an individual's disciplinary history. Henry v. Rahway State Prison, 81 N.J. 571 (1980); In re Herrmann, 192 N.J. 19, 33–34 (2007). Progressive discipline is not a "fixed and immutable rule to be followed without question." Carter v. Bordentown, 191 N.J. 474, 484 (2007). Rather, it is recognized that some disciplinary infractions are so serious that removal is appropriate notwithstanding a largely unblemished record. Ibid.

The County seeks to remove Curtis from his position as a sheriff's officer for misconduct pursuant to N.J.S.A. 40A:13-147 for his violations of N.J.A.C. 4A:2-2.3(a)(6), conduct unbecoming a public employee that included an unprovoked assault and destruction of property charges, and N.J.A.C. 4A:2-2.3(a)(12), other sufficient cause, for violation of CMCSO Rules and Regulations.

The County relies principally on the egregiousness of appellant's conduct in asserting that progressive discipline is not warranted, and that termination is appropriate for this first-time discipline. That County submits that sheriff's officers are held to a higher standard and corrections facilities are operated as a paramilitary organization, and, as such, rules and regulations are to be strictly followed. Maintenance of strict discipline is

important in military-like settings such as police departments, prisons, and correctional facilities. Rivell v. Civil Serv. Comm'n, 115 N.J. Super. 64, 72 (App. Div.), certif. denied, 50 N.J. 269 (1971); City of Newark v. Massey, 93 N.J. Super. 317 (App. Div. 1967). Refusal to obey orders and disrespect of authority are not to be tolerated. Cosme v. Borough of E. Newark Twp. Comm., 304 N.J. Super. 191, 199 (App. Div. 1997).

Law-enforcement officers are held to a higher standard of conduct than other employees, and are expected to act in a responsible manner, honestly, and with integrity, fidelity, and good faith. <u>In re Phillips</u>, 117 N.J. 567, 576 (1990); <u>Reinhardt v. E. Jersey State Prison</u>, 97 N.J.A.R.2d (CSV) 166. It is well settled that suspension or removal may be justified where the misconduct occurred off duty; were it otherwise, "the desired goal of upholding the morale and discipline of the force, as well as maintaining public respect for its officers, would be undermined." <u>In re Emmons</u>, 63 N.J. Super. 140.

Here, the appellant disputes the penalty to be imposed, but not the conduct. The County seeks removal of the appellant because of the underlying conduct that caused the charges to be filed. The fact that the charges were ultimately dismissed is not relevant. "Where the conduct of a public employee which forms the basis of disciplinary proceedings may also constitute a violation of the criminal law, . . . the absence of a conviction, whether by reason of nonprosecution or even acquittal, bars neither prosecution nor finding of guilt for misconduct in office in the disciplinary proceedings." Sabia v. Elizabeth, 132 N.J. Super. 6, 12 (App. Div. 1974).

Here the appellant had only been employed as a corrections officer in the Office of the Sheriff of Cape May County since 2015. (R-N.) Appellant offered no mitigating circumstances for his actions on June 30, 2017, other than his prior unblemished record.

The aggravating factors are significant: appellant entered a restricted area of a casino, attempted to remove property, broke a security camera, and then assaulted the employee, who discovered him. Appellant does not dispute the behavior.

Having weighed the aggravating and mitigating factors and the proofs presented, i CONCLUDE that appellant's misconduct was so egregious as to warrant removal, and respondent's action of removing the appellant from his position is appropriate. Appellant failed to adhere to the code of conduct, which applies while on and off duty. Appellant also failed to conduct himself in the manner required for the special position of trust he holds as a correction officer with police powers.

I CONCLUDE that the action of the County removing appellant for his actions should be AFFIRMED.

## **DECISION AND ORDER**

Respondent has proven by a preponderance of credible evidence the following charges against Curtis: N.J.A.C. 2C:12-1(a)(1), assault; N.J.A.C. 4A:2-2.3(a)(6), conduct unbecoming a public employee, N.J.A.C. 4A:2-2.3(a)(12), other sufficient cause, including violations of the CMCSO Rules and Regulations 4.1.1, standard of conduct and CMCSO 4.1.12, obedience to laws and regulations. Accordingly, I ORDER that these charges be and are hereby SUSTAINED. Furthermore, I ORDER that the penalty of removal is hereby AFFIRMED.

I hereby FILE my initial decision with the CIVIL SERVICE COMMISSION for consideration.

This recommended decision may be adopted, modified or rejected by the CIVIL SERVICE COMMISSION, which by law is authorized to make a final decision in this matter. If the Civil Service Commission does not adopt, modify or reject this decision within forty-five days and unless such time limit is otherwise extended, this recommended decision shall become a final decision in accordance with N.J.S.A. 40A:14-204.

Within thirteen days from the date on which this recommended decision was mailed to the parties, any party may file written exceptions with the DIRECTOR, DIVISION OF APPEALS AND REGULATORY AFFAIRS, UNIT H, CIVIL SERVICE COMMISSION, 44 South Clinton Avenue, PO Box 312, Trenton, New Jersey 08625-0312, marked "Attention: Exceptions." A copy of any exceptions must be sent to the judge and to the other parties.

|                          | Kathler M. Calemno       |
|--------------------------|--------------------------|
| March 28, 2019<br>DATE   | KATHLEEN M. CALEMMO, ALJ |
| Date Received at Agency: | March 28, 2019           |
| Date Mailed to Parties:  | 4-2-19                   |
| tat/lam                  |                          |

# **APPENDIX**

## **LIST OF WITNESSES**

## For Appellant:

**Cory Curtis** 

# For Respondent:

James Walicky

Kourtney Perry

Ellen Loughney

Donald Lombardo

# **LIST OF EXHIBITS**

## For Appellant:

- P-A Thank you letter, dated May 22, 2018, from the Cape May Prosecutor
- P-B Perfect attendance commendation for 2016
- P-C Disposition summary of conditional discharge
- P-D Resolution from the County Freeholders.

# For Respondent:

- R-A Summons and Complaint criminal mischief
- R-B Summons and Complaint simple assault
- R-C Perry's investigation report
- R-D PNDA
- R-E DVD-R disc from Borgata
- R-F Incident file report from Borgata
- R-G Perry's April 9, 2018 report

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R-H FNDA

R-I CMCSO Rules and Regulations

R-J Report of Curtis

R-K Not in evidence

R-L Not in evidence

R-M Curtis' application to County

R-N Copy of Oath of Office