From: daniel richardson
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:39:33 PM

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Report Suspicious

Dear David Fish,

[highlight=transparent]I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. [/highlight]

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[highlight=transparent]Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.[/highlight]

Yours sincerely,
daniel richardson
51 freddie ave
Avenel, NJ 07001
drichardson3491@gmail.com

From: steven chrobock
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:40:33 PM

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Yours sincerely,
steven chrobock
5558b berkshire valley road
Oak Ridge, NJ 07438
doublehugg@yahoo.com

From: gwendolyn owens
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:40:36 PM

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Yours sincerely,
gwendolyn owens
26 w. hanover place
Trenton, NJ 08608
gwendolyno1947@gmail.com

From: kyong kwon
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:43:34 PM

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Yours sincerely,
kyong kwon
430 cedar ln #201
River Vale, NJ 07675
come2korea@gmail.com

From: teresa williams
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:43:35 PM

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Report Suspicious

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Yours sincerely,
teresa williams
247 jericho rd.
Bridgeton, NJ 08302
bluebird93055@aol.com

From: michael hutchins
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:46:34 PM

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Yours sincerely,
michael hutchins
752 trumbull ave
Lawrence Township, NJ 08648
lashonawatkins6202@gmail.com

From: wanda garcia
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:51:33 PM

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Yours sincerely,
wanda garcia
227 william street
Belleville, NJ 07109
wandag1262@gmail.com

From: melissa scott
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:51:33 PM

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Yours sincerely,
melissa scott
17walnutstreet
Toms River, NJ 08753
mscott4865@gmail.com

From: kristina davis
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:52:35 PM

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Yours sincerely,
kristina davis
716 hulses corner rd
Howell, NJ 07731
kristinadavis485@gmail.com

From: ingrid salazar
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:52:38 PM

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Yours sincerely,
ingrid salazar
119 essex st
Hackensack, NJ 07601
i.salazar1@yahoo.com

From: desmond bryant
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:53:34 PM

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Yours sincerely,
desmond bryant
22 fallsington place
Chesterfield, NJ 08515
d_bryant24@hotmail.com

From: kyle morais
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:54:34 PM

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Yours sincerely,
kyle morais
176 johnson pl
South River, NJ 08882
kylemorais35@gmail.com

From: lizbeth martinez
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:55:33 PM

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Yours sincerely,
lizbeth martinez
14 north georgia ave apt d rear
Atlantic City, NJ 08401
lizbeth.martinez2002@icloud.com

From: samira andelmessih
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:57:32 PM

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Yours sincerely,
samira andelmessih
700 newark ave appt#805
Jersey City, NJ 07306
samira.abdelmessih@gmail.com

From: doris robinson
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:58:35 PM

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Yours sincerely,
doris robinson
191 south hill dr
Westampton, NJ 08060
msdjr191@aol.com

From: william brown
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:58:35 PM

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Yours sincerely,
william brown
126 park ave
Paterson, NJ 07501
willbro58@hotmail.com

From: bea samol
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:58:36 PM

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Report Suspicious

Dear David Fish,

[highlight=transparent]I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. [/highlight]

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[highlight=transparent]Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.[/highlight]

Yours sincerely,
bea samol
3705 graham ct
Bridgewater, NJ 08807
beatricesamol9@gmail.com

From: sailaja koppuravuri
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 1:59:22 PM

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Yours sincerely,
sailaja koppuravuri
9 maida rd
Edison, NJ 08820
achanta.satyavathi@gmail.com

From: patrickryan zamora
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:01:33 PM

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Yours sincerely,
patrickryan zamora
288 n haledon ave
North Haledon, NJ 07508
thewerks0ne@gmail.com

From: mary baglivi
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:02:36 PM

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Yours sincerely,
mary baglivi
74 windsor rd
Oradell, NJ 07649
proud@optomline.net

From: robert glavotsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:06:34 PM

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Yours sincerely,
robert glavotsky
17 gerard. dr.
Waldwick, NJ 07463
glavotsky@gmail.com

From: florence evans
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:06:34 PM

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Yours sincerely,
florence evans
41 stow creek road
Bridgeton, NJ 08302
fse33@yahoo.com

From: sharon koponosh
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:06:34 PM

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Yours sincerely,
sharon koponosh
129 irvington ave.
Trenton, NJ 08620
charmin18215@aol.com

From: chris guerrero
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:06:35 PM

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Yours sincerely,
chris guerrero
728 elm ave
River Edge, NJ 07661
guerrerojack4@gmail.com

From: dennis freeman
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:08:33 PM

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Yours sincerely,
dennis freeman
28 inverness drive
Marlboro, NJ 07746
jordanafreeman21@gmail.com

From:	Justin Files
To:	Fish, David [DOL]
Cc:	Tim Crowther; Bernie Snyder
Subject:	[EXTERNAL] IUPAT District Council 21 - ABC Test Independent Contractor Comments
Date:	Thursday, June 26, 2025 2:08:47 PM
Attachments:	image001.png IUPAT DC21 ABC Test - Independent Contractors.pdf

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Mr. Fish

Please see the attached letter from the desk of Business Manager/Secretary Treasurer, Mr. Bernie Snyder, of IUPAT District Council 21.

Addressing the misclassification of workers as independent contractors it a critical issue in the State of NJ to ensure we protect workers and their well-being.

If you have any questions or comments, please contact Mr. Snyder.

Thank you for your time and consideration on this important matter.

Justin Files
Financial Controller
District Council 21
O: (215) 677-7980

INTERNATIONAL UNION OF

PAINTERS & ALLIED TRADES

DISTRICT COUNCIL 21

BERNIE SNYDER
BUSINESS MANAGER
SECRETARY-TREASURER

(215) 677-7980
FAX (215) 677-3877

AFFILIATED WITH

PHILADELPHIA, NORTHEASTERN PENNSYLVANIA, NEW JERSEY, AND DELAWARE BUILDING TRADES COUNCILS

PHILADELPHIA/ DELAWARE VALLEY, NEW JERSEY, DELAWARE AND PENNSYLVANIA AFL-CIO'S

EASTERN REGION CONFERENCE OF I.U.P.A.T.

HEADQUARTERS
2980 SOUTHAMPTON ROAD
PHILADELPHIA, PA 19154

June 25, 2025

Mr. David Fish, Executive Director
Legal and Regulatory Service
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, NJ 08625-0110
Via email: david.fish@dol.nj.gov

RE: ABC Test; Independent Contractors, N.J.A.C. 12:11

Dear Mr. Fish,

I am writing to you on behalf of a membership approaching 3,000 New Jerseyan tradespeople who make up the International Union of Painters and Allied Trades District Council ("IUPAT DC21") and in advocacy of the non-member workers in our trade. IUPAT DC21 is a trades union that fights every day for the rights and well-being of workers in the painting, drywall finishing, wall covering, and glazing professions. We see every day the prevalence of misclassification in construction and the harm that it inflicts on workers. The proposed new N.J.A.C. 12:11 will enshrine already employed public policy that protects workers and allows high-road employers in construction to remain competitive.

Every day, our organizers speak with workers in our industry to understand the nature of their work. These efforts shine a light on the common use of misclassification in construction and provide a personal perspective of its effects on the worker. It is no secret that the practice deprives workers of wage protections, legal protections, and access to safety net programs. More importantly, however, we have found that employers who misclassify workers too often hold and use vicious levels of control over their workers. Workplace protections and access to programs extend beyond the face-value benefits to the worker; it provides them with dignity and power over their own lives.

The Department of Labor & Workforce Development has made clear to the public the need for strong and clear worker classification regulations through its actions penalizing dishonest employers who misclassify. In these cases, employers exploited workers by illegally withholding pay, suppressing wages, and denying legal protections. Misclassification in construction nationwide is not by mistake, it is not simply an organic business strategy born from the free market, but a permitted loophole that is deliberately maintained by cottage

INTERNATIONAL UNION OF

PAINTERS & ALLIED TRADES

DISTRICT COUNCIL 21

BERNIE SNYDER
BUSINESS MANAGER
SECRETARY-TREASURER

(215) 677-7980
FAX (215) 677-3877

AFFILIATED WITH

PHILADELPHIA, NORTHEASTERN PENNSYLVANIA, NEW JERSEY, AND DELAWARE BUILDING TRADES COUNCILS

PHILADELPHIA/ DELAWARE VALLEY, NEW JERSEY, DELAWARE AND PENNSYLVANIA AFL-CIO'S

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HEADQUARTERS
2980 SOUTHAMPTON ROAD
PHILADELPHIA, PA 19154

industries.[1] New Jerseyans want their economy to be competitive, lawful, and respectful of the worker. Enshrining New Jersey's current public policy into the regulations, like the proposed changes to N.J.A.C. 12:11, is crucial to mending an uncompetitive marketplace that has been warped for decades.

New Jersey and its residents need high-road employers who provide family sustaining career opportunities. It is challenging, right now, for those employers in construction to stay competitive when the industry is rife with dishonest employers who misclassify. Employers who misclassify have an estimated 20-40% lower labor costs than their law-abiding competition.[2] With this type of advantage, widespread misclassification warps the marketplace and forces the practice to become a de facto requirement. East Bay Drywall, LLC v. Dep't of Labor and Workforce Development depicted this so clearly. East Bay Drywall hired 16 workers, classified them as independent contractors without having substantial evidence affirming their track record as independent businesses, all due to the overwhelming competitive incentive to misclassify. Public policy that enshrines the proposed N.J.A.C. 12:11 paired with effective enforcement are the types of public policy New Jersey needs to allow high-road employers in construction to compete and ensure workers are treated fairly.

We thank your department for all the work done to fight misclassification in our state. Addressing this issue is paramount to empowering working people and protecting our reputable businesses. Should you have any questions or concerns regarding this or any other manner, please don't hesitate to contact me at 215-934-5080 or bsnyder@dc21.com.

Sincerely,

Bernie Snyder
Business Manager/Secretary-Treasurer
IUPAT District Council 21

[1] Erlich, M. (2020). Misclassification in Construction: The Original Gig Economy. *ILR Review*, *74*(5), 001979392097232. https://doi.org/10.1177/0019793920972321

[2] *Statement of Seth D. Harris Deputy Secretary U.S. Department of Labor Before the Committee on Health, Education, Labor, and Pensions U.S. Senate*, 111th Cong. (2010). Seth D. Harris. https://www.help.senate.gov/imo/media/doc/Harris4.pdf

From: robert strama
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:09:35 PM

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Yours sincerely,
robert strama
34 north main st
New Egypt, NJ 08533
stramamainstgarage@aol.com

From: elijah crawford
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:14:34 PM

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Yours sincerely,
elijah crawford
318 e state rt 4
Paramus, NJ 07652
elijah_crawford@live.com

From: tracie bonneau
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:16:33 PM

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Yours sincerely,
tracie bonneau
320 south harrison st.
East Orange, NJ 07018
raehardy48@gmail.com

From: emelia kpinpuo
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
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Yours sincerely,
emelia kpinpuo
283 roanoke street
Woodbridge, NJ 07095
emelia.kpinpuo@lc.cuny.edu

From: jamie palm
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:19:35 PM

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Report Suspicious

Dear David Fish,

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Yours sincerely,
jamie palm
17 wyndham rd
Voorhees, NJ 08043
jamiexox91@aim.com

From: nancy rokos
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:24:33 PM

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Yours sincerely,
nancy rokos
423 garden state dr.
Cherry Hill, NJ 08002
wineee@yahoo.com

From: kevin mcdonough
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:24:34 PM

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Yours sincerely,
kevin mcdonough
507 lydia ln
Wyckoff, NJ 07481
kevin.mcdonough22@gmail.com

From: marilyn tomasso
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:30:34 PM

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Yours sincerely,
marilyn tomasso
456b portsmouth drive
Lakewood, NJ 08701
marilyntomasso64@gmail.com

From: j w
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:31:34 PM

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Yours sincerely,
j w
3 beechwood dr
Wayne, NJ 07470
zxw9876@gmail.com

From: boris khvan
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:31:36 PM

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Yours sincerely,
boris khvan
72 montgomery st
Jersey City, NJ 07302
khvanboris53@gmail.com

From: jennifer price
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:32:34 PM

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Yours sincerely,
jennifer price
5 forest hills dr
Medford, NJ 08055
jennyprice1128@gmail.com

From: brian young
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:37:33 PM

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Yours sincerely,
brian young
100 atkins ave.
Asbury Park, NJ 07712
briany473@gmail.com

From: edna long
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:39:34 PM

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Yours sincerely,
edna long
30 earnshaw lane
Willingboro, NJ 08046
ednaivy@comcast.net

From: diane pernie
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:39:34 PM

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Yours sincerely,
diane pernie
537 cascade ct
Sewell, NJ 08080
dcpernie@yahoo.com

From: shahuna fowler
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:40:32 PM

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Yours sincerely,
shahuna fowler
999 hidden lake drive
North Brunswick, NJ 08902
shahunafowler@yahoo.com

From: john dimicco
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:43:34 PM

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Yours sincerely,
john dimicco
43 clement st
Nutley, NJ 07110
johndimicco@yahoo.com

From: sam yoon
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:45:33 PM

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Yours sincerely,
sam yoon
116 irving pl
Rutherford, NJ 07070
sy.samyoon@gmail.com

From: jonathan rodriguez
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:45:33 PM

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Yours sincerely,
jonathan rodriguez
1109 53rd st
North Bergen, NJ 07047
balty22_2010@hotmail.com

From: anthony felcon
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:48:34 PM

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Yours sincerely,
anthony felcon
50 s. sunset rd.
Willingboro, NJ 08046
tfelcon64@gmail.com

From: andrew buchko
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:48:34 PM

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Yours sincerely,
andrew buchko
133 garden terrace
Edison, NJ 08817
andrewbuchko612@gmail.com

From: claudette mayers
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:50:34 PM

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Report Suspicious

Dear David Fish,

[highlight=transparent]I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. [/highlight]

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Yours sincerely,
claudette mayers
9d ari drive
Somerset, NJ 08873
cldttmayers@hotmail.com

From: james yang
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:51:06 PM

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Yours sincerely,
james yang
112 forest glen dr
Highland Park, NJ 08904
diddmsrb7890@gmail.com

From: deborah fisher
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:53:33 PM

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Yours sincerely,
deborah fisher
butter3692002@yahoo.com
National Park, NJ 08063
butter3692002@yahoo.com

From: laura starr
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:53:34 PM

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Yours sincerely,
laura starr
108 south broad st. apt 215
Woodbury, NJ 08096
lstarr81.ls@gmail.com

From: daniel beup
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:53:38 PM

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Yours sincerely,
daniel beup
132 berthold ave
Rahway, NJ 07065
my.duude@gmail.com

From: farod robinson
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:54:32 PM

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Yours sincerely,
farod robinson
32 grant ave
Jersey City, NJ 07305
farod45@gmail.com

From: magalis balanquet
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:55:33 PM

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Yours sincerely,
magalis balanquet
25 manor drive
Newark, NJ 07106
mbalanquet@yahoo.com

From: barbara crone
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 2:59:37 PM

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Yours sincerely,
barbara crone
142 forest dr
Piscataway, NJ 08854
barbaracrone1@gmail.com

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:00:34 PM

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Sincerely,
pennie denechaud
26 brewster ct
Pennington, NJ 8534
ddenechaud1@verizon.net

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Sincerely,
katherine williams
868 e. commerce street,trir #117
Bridgeton, NJ 8302
missrosiebaby57@gmail.com

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Sincerely,
hayley mcateer
706 brookside drive
Toms River, NJ 8753
hayleymcateer1@gmail.com

From: claudia pusar
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:00:38 PM

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Yours sincerely,
claudia pusar
100 franklin turnpike
Waldwick, NJ 07463
claudiapusar0@gmail.com

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Sincerely,
shawonda swain
32 laidlaw ave
Jersey City, NJ 7306
sswain37@yahoo.com

From: elijah reed
To: Fish, David [DOL]
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Yours sincerely,
elijah reed
52 new heckman dr
Jersey City, NJ 07305
elijahreed900@gmail.com

From: andrew parris
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:01:32 PM

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Yours sincerely,
andrew parris
52 highbridge blvd
Medford, NJ 08055
andrewparris1021@icloud.com

From: shiyang li
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:02:35 PM

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Yours sincerely,
shiyang li
270 10th st. apt. 312
Jersey City, NJ 07302
lishiy99@gmail.com

From: regina stewart
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:03:34 PM

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Yours sincerely,
regina stewart
2538 tremont ave trlr 84
Egg Harbor Township, NJ 08234
ginny2911@yahoo.com

From: anthony taylor
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:05:34 PM

This Message Is From an Untrusted Sender
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Yours sincerely,
anthony taylor
67 old new brunswick rd
Piscataway, NJ 08854
trigger4959@gmail.com

From: chelses pohlman
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:05:36 PM

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Yours sincerely,
chelses pohlman
69 pebble beach drive
Egg Harbor Township, NJ 08234
chelspohl@gmail.com

From: trever huel
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:07:33 PM

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Yours sincerely,
trever huel
58-28 gladstone ave,
Newark, NJ 07106
treverhue@gmail.com

From: lisa fenimore
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:07:35 PM

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Yours sincerely,
lisa fenimore
208 madison ave
Lumberton, NJ 08048
fenimorewolf@aol.com

From: holly mitchell
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:09:33 PM

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Yours sincerely,
holly mitchell
490 rena ct
Brick, NJ 08724
holli4rmnj@gmail.com

From: amtul noor
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:12:34 PM

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Yours sincerely,
amtul noor
550 sunhaven dr
Clayton, NJ 08312
amtulnoor2010@hotmail.com

From: oscar merino
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:14:41 PM

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Yours sincerely,
oscar merino
221 n main st a
Wharton, NJ 07885
osk_r_19@hotmail.com

From: Charles Bowman
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, June 26, 2025 3:20:10 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Charles Bowman
753 Albemarle St
Wyckoff, NJ 07481
c.bowman@lpl.com

From: antjuan bruce
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:20:34 PM

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Yours sincerely,
antjuan bruce
123north11thstreet
Newark, NJ 07107
hoose458@gmail.com

From: gayle shinn
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:23:34 PM

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Yours sincerely,
gayle shinn
23 holly rd
West Creek, NJ 08092
gayle3852@aol.com

From: sherwood stehr
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:30:33 PM

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Yours sincerely,
sherwood stehr
855 new durham rd
Edison, NJ 08817
number1waste@gmail.com

From: joe hardy
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:30:34 PM

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Yours sincerely,
joe hardy
30 belle ave
Paterson, NJ 07522
joehard1944@gmail.com

From: dolores ayala
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:34:33 PM

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Yours sincerely,
dolores ayala
225 lorillard ave
Union Beach, NJ 07735
deelicious930@yahoo.com

From: edward cenneno
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:34:34 PM

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Yours sincerely,
edward cenneno
50 ginger drive
Lumberton, NJ 08048
edwardpcenneno38@gmail.com

From: murray adams
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:38:33 PM

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Yours sincerely,
murray adams
34 chelsea ave
East Orange, NJ 07018
murray66_adams@yahoo.com

From: john scott
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:39:33 PM

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[highlight=transparent]Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.[/highlight]

Yours sincerely,
john scott
812 cumberland blvd
Toms River, NJ 08757
josjoh57@gmail.com

From: rene duckrey
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:40:33 PM

This Message Is From an Untrusted Sender
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Report Suspicious

Dear David Fish,

[highlight=transparent]I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. [/highlight]

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Yours sincerely,
rene duckrey
500 lampart ave apt 320
Sicklerville, NJ 08081
rduckrey1@gmail.com

From: jose padron
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:42:32 PM

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Yours sincerely,
jose padron
70 ann st.# 2
Newark, NJ 07105
thsjosepadron@gmail.com

From: tiffany chan
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:43:33 PM

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Yours sincerely,
tiffany chan
321 willow ave. apt 5
Hoboken, NJ 07030
tiffany.yy.chan@gmail.com

From: joni skalanorris
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:43:36 PM

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Yours sincerely,
joni skalanorris
2272 polk ave
North Brunswick, NJ 08902
jskala19@gmail.com

From: john lipiec
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:46:33 PM

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Yours sincerely,
john lipiec
38 brainerd street
Mount Holly, NJ 08060
headhunter52@comcast.net

From: joseph marshello
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:46:34 PM

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Yours sincerely,
joseph marshello
1017simpsonave
Ocean City, NJ 08226
jmarshello@comcast.net

From: sue palumbo
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:46:35 PM

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Yours sincerely,
sue palumbo
100 brunswick ave
Spotswood, NJ 08816
suepalumbo37@gmail.com

From: julia santos
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:46:36 PM

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Yours sincerely,
julia santos
27 park place apt 17
Bloomfield, NJ 07003
juliarodrigueslog@outlook.com

From: thelma earle
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:47:04 PM

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Yours sincerely,
thelma earle
182 north arlington ave
East Orange, NJ 07017
brownsuga050@gmail.com

From: john jackson
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:50:02 PM

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Yours sincerely,
john jackson
341-east 28th st
Paterson, NJ 07514
johnjackson1723@gmail.com

From: Donald Link
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, June 26, 2025 3:50:13 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Donald Link
249 Hyslip Ave
Westfield, NJ 07090
don.link@linkfinancial-ne.com

From: eileen hansen
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:50:33 PM

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Yours sincerely,
eileen hansen
76 grove st
Bloomfield, NJ 07003
danepaint@comcast.net

From: daniel smith
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:54:34 PM

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Yours sincerely,
daniel smith
281 union ave
New Providence, NJ 07974
dansmith020147@gmail.com

From: shayla steele
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:54:35 PM

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Yours sincerely,
shayla steele
243 princeton ave
Pemberton, NJ 08068
shayla.steele1@gmail.com

From: noelle frye
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:54:36 PM

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Yours sincerely,
noelle frye
176 tryens dr
Mays Landing, NJ 08330
nbooye418@gmail.com

From: renae hodges
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 3:59:34 PM

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Yours sincerely,
renae hodges
615s.clinton
Trenton, NJ 08611
renaehodges27@gmail.com

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:00:49 PM

This Message Is From an Untrusted Sender
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Report Suspicious

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Sincerely,
shirley eng
2 skytop terrace
Montclair, NJ 7043
saeng@yahoo.com

From: dinesh sharma
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:02:35 PM

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Yours sincerely,
dinesh sharma
5, sylvan way.
Short Hills, NJ 07078
dhanjishanker49@gmail.com

From: mayelin yangel
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:05:32 PM

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Yours sincerely,
mayelin yangel
257 hoover ave
Bloomfield, NJ 07003
tessely12@gmail.com

From: james gruters
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:06:41 PM

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Yours sincerely,
james gruters
221 thousand oaks dr
Atlantic Highlands, NJ 07716
jimevett@aol.com

From: dori letke
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:13:33 PM

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Yours sincerely,
dori letke
533shermanave
Belford, NJ 07718
doriletke@gmail.com

From: edna stewart
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:13:34 PM

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Yours sincerely,
edna stewart
69 oak st
Carteret, NJ 07008
stewarel50@gmail.com

From: elaine stewart
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:13:34 PM

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Yours sincerely,
elaine stewart
2240 whitehorse mercerville rd
Trenton, NJ 08619
tusayelaine@gmail.com

From: jennifer dyson
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:14:32 PM

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Yours sincerely,
jennifer dyson
1 division street
Port Monmouth, NJ 07758
swojo4780@aol.com

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Yours sincerely,
jennifer dyson
1 division street
Port Monmouth, NJ 07758
swojo4780@aol.com

From: denise benoit
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:18:34 PM

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Yours sincerely,
denise benoit
17 college drive
Jersey City, NJ 07305
denisebenoit22@aol.com

From: joanne vaughan
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:18:34 PM

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Yours sincerely,
joanne vaughan
25 center st
Elmer, NJ 08318
shelbi2019@gmail.com

From: vickie gracey
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:18:35 PM

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Yours sincerely,
vickie gracey
210 saint marys drive
Cherry Hill, NJ 08003
deldocv65@gmail.com

From: alexandra estevez
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:18:38 PM

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Yours sincerely,
alexandra estevez
westfield nj
Westfield, NJ 07104
asapreo@gmail.com

From: john bodine
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:22:35 PM

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Yours sincerely,
john bodine
1125 barnacle dr
Manahawkin, NJ 08050
john.bodine@gmail.com

From: cecilia passley
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:25:33 PM

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Yours sincerely,
cecilia passley
72 hobart avenue
Trenton, NJ 08629
ccl_mthws@yahoo.com

From: stephanie whitworth
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:25:34 PM

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[highlight=transparent]Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.[/highlight]

Yours sincerely,
stephanie whitworth
1426 w main st
Millville, NJ 08332
whitworthstephanie8@gmail.com

From: patrice satterfield
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:26:33 PM

This Message Is From an Untrusted Sender
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Report Suspicious

Dear David Fish,

[highlight=transparent]I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. [/highlight]

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Yours sincerely,
patrice satterfield
820 partridge run
Point Pleasant Beach, NJ 08742
tritri56@gmail.com

From: tomasz gawel
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:29:33 PM

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Report Suspicious

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Yours sincerely,
tomasz gawel
572beechave
Saddle Brook, NJ 07663
tomren3@yahoo.com

From: theresa braswell
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:39:35 PM

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Yours sincerely,
theresa braswell
25 elm rd
Millville, NJ 08332
theresabraswell@gmail.com

From: jeanie haas
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:40:34 PM

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Report Suspicious

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[highlight=transparent]I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. [/highlight]

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Yours sincerely,
jeanie haas
14101 goodrow ct.
Princeton, NJ 08540
kayaker20@gmail.com

From: linda saez
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:41:36 PM

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Report Suspicious

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Yours sincerely,
linda saez
25 meadow lane
Bloomfield, NJ 07003
ellensaez@yahoo.com

From: tieasha lewis
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:44:35 PM

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Report Suspicious

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Yours sincerely,
tieasha lewis
802 grove st
Irvington, NJ 07111
tieasha717@icloud.com

From: edna rizzo
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:46:34 PM

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Report Suspicious

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Yours sincerely,
edna rizzo
401 dercole ct
Norwood, NJ 07648
jcfednarizzo@hotmail.com

From: donald wilson
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:46:35 PM

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Yours sincerely,
donald wilson
202 old mill
Cape May, NJ 08204
braedongeorge@gmail.com

From: mona samy
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:47:38 PM

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Yours sincerely,
mona samy
160 w 32nd st
Bayonne, NJ 07002
maryolla@yahoo.com

From: boysie beepat
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:48:33 PM

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Report Suspicious

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Yours sincerely,
boysie beepat
32union street
Burlington, NJ 08016
boysiebeepat1946@gmail.com

From: daniel ventura
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:49:34 PM

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Yours sincerely,
daniel ventura
409 front street
Dunellen, NJ 08812
dcvmax1@gmail.com

From: sheslia downey
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 4:50:35 PM

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Yours sincerely,
sheslia downey
7634 joseph st
Millville, NJ 08332
shealia461@gmail.com

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, June 26, 2025 5:00:34 PM

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Sincerely,
raymond rouse
8 locust st
Jersey City, NJ 7305
raymondrouse57@gmail.com

From: Joseph Johnston
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, June 26, 2025 5:10:28 PM

This Message Is From an Untrusted Sender
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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Joseph Johnston
510 Superior Rd
Egg Harbor Township, NJ 08234
jjohnston@lincolninvestment.com

From: Connor Womack
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, June 26, 2025 5:20:11 PM

This Message Is From an Untrusted Sender
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Report Suspicious

Dear Executive Director Fish,

I'm writing not only as a financial advisor, but as a mother, a small business owner, and a proud New Jersey resident who depends on the flexibility and independence of my work to support my family.

For the past several years, I've built a business serving public employees and educators across the state—helping them plan for retirement, protect their families, and reach financial security. I do this as an independent financial advisor, not an employee. I chose this path because it allows me to maintain control over my schedule and serve my clients with the care and attention they deserve—without being bound to a corporate structure that doesn't fit their needs or mine.

Most importantly, this independence allows me to be present for my two young daughters. I manage client meetings around school drop-offs, doctor appointments, and family meals. I work hard—early mornings, late evenings, and weekends when needed—but I also get to be the kind of mother I want to be. That balance is only possible because I am an independent contractor.

The proposed rules from the Department would threaten that balance and that freedom. If my broker-dealer were to be considered my employer, it could force changes that make it harder—if not impossible—for me to continue running my business on my terms. I'm concerned it would also make broker-dealers less willing to support professionals like me, which would directly impact the clients I serve and the future I'm trying to build for my family.

I urge you to reconsider the language in the proposed rules. Please do not disrupt a business model that has worked for so many hardworking, ethical, family-focused professionals like myself. Protect the independence that allows me—and countless others—to thrive.

Thank you for your time and for considering the very real impact this decision would have on families like mine.

Sincerely,

Connor Womack
Independent Financial Advisor
Mother of Two

Sincerely,

Connor Womack
278 Iannelli Rd
Clarksboro, NJ 08020
cwomack@lincolninvestment.com

From: Thomas Price
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, June 26, 2025 5:20:22 PM

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Thomas Price
1600 S Wanamassa Dr
Ocean, NJ 07712
tprice@lincolninvestment.com

From: Dara Federici
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, June 26, 2025 5:30:10 PM

This Message Is From an Untrusted Sender
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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

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Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Dara Federici
268 N Grand St
Hammonton, NJ 08037
dfederici@lincolninvestment.com

From: Michael O"Connell
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, June 26, 2025 6:40:08 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Michael O'Connell
10 Fieldstone Ct
Mahwah, NJ 07430
michael.oconnell@lpl.com

From: Frank Violante
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, June 26, 2025 7:30:10 PM

This Message Is From an Untrusted Sender
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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Frank Violante
17 Villanova Dr
Kendall Park, NJ 08824
fviolante@lincolninvestment.com

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Please oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 5:01:11 AM

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Report Suspicious

The introduction of N.J.A.C. 12:11 by the New Jersey Department of Labor signals a troubling potential shift for our independent workforce. By adopting the ABC test, the livelihoods of numerous freelancers and contractors across New Jersey face great uncertainty.

California's experience with AB 5 provides clear evidence of the potential fallout from such measures: job loss and disruption even beyond independent roles. This reality threatens to unsettle those who separate themselves professionally by choice, warranting a decisive stance against this rule. Let us unite to prevent these impacts and support the voices of independent workers today.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Protect Workers' Rights: Oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 5:01:11 AM

This Message Is From an Untrusted Sender
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Report Suspicious

I am compelled to speak out against the proposed rule N.J.A.C. 12:11 by the New Jersey Department of Labor. By imposing an ABC test, this rule risks dismantling the livelihood and autonomy of independent workers in the state, many of whom are proud of their work based on self-direction and flexibility.

California's AB 5 provides a cautionary tale, revealing extensive economic harms and piecemeal legislative fixes. The overwhelming majority of freelancers and contractors value their independent status, which is under threat from this potential legislation. Support these workers by recognizing their voices and opposing the change.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Keep NJ Independent Workers Free — Say No to N.J.A.C. 12:11
Date: Friday, June 27, 2025 5:01:11 AM

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Report Suspicious

The proposal for N.J.A.C. 12:11 poses a significant risk to New Jersey's freelance and gig economy. This rule, which involves adopting an ABC test for independent contractors, mirrors California's AB 5 which resulted in considerable job displacement and instability.

The choice of flexible work arrangements is cherished by many, with surveys indicating strong satisfaction among independent workers. Adopting N.J.A.C. 12:11 threatens this by trying to impose unsuitable classifications. Let us heed the lessons from California, protect job choice, and oppose this proposal to secure a thriving work environment for independent professionals.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Please oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 5:01:12 AM

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Report Suspicious

I urge the New Jersey Department of Labor and Workforce Development to reject the proposed rule N.J.A.C. 12:11, which is set to redefine the status of independent contractors. Implementing the ABC test threatens the income of many independent workers who contribute significantly across various state industries.

California faced significant backlash with their similar AB 5 law, leading to unintended job losses and economic disruption. The majority of independent workers in New Jersey are content with their flexible work mode, many having deliberately chosen it. By foreseeing these risky outcomes, let us strive to protect the preferred livelihood of countless residents.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Oppose Harmful N.J.A.C. 12:11
Date: Friday, June 27, 2025 5:01:28 AM

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Report Suspicious

I appeal to the New Jersey Department of Labor and Workforce Development to decline the newly proposed rule N.J.A.C. 12:11. Implementing an ABC test as part of this rule could devastate the independent worker community in New Jersey by forcing damaging reclassifications.

We have seen the consequences of such a move in California with the AB 5 law, which resulted in significant economic disruptions. Many independent workers have voiced their satisfaction with their current statuses, clearly preferring freedom over rigid employment structures. We must listen to their appeals and oppose any rules that would compromise their way of working.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Please oppose N.J.A.C. 12:11!
Date: Friday, June 27, 2025 7:00:43 AM

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Report Suspicious

I am writing to implore the New Jersey Department of Labor and Workforce Development to turn down the newly proposed rule N.J.A.C. 12:11. The proposed ABC test used to classify independent workers would jeopardize the stability and autonomy of hundreds of thousands of people within the state, putting their incomes and chosen lifestyles at risk.

California's AB 5 demonstrated the adverse effects of such legislation, leading to unintended job losses and the fragmentation of vital industries through numerous exemptions. Independent workers, who often choose their roles for the flexibility it offers, do not need this regulatory turmoil. Please listen to their voices and reconsider implementing such a reclassification mandate.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Don"t Let N.J.A.C. 12:11 Derail NJ"s Workforce
Date: Friday, June 27, 2025 8:00:39 AM

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Report Suspicious

I am writing to voice my concern regarding the New Jersey Department of Labor and Workforce Development's proposed N.J.A.C. 12:11 rule. This rule endorses an ABC test for classifying independent contractors, threatening to undermine thousands of workers across New Jersey by altering their employment status adversely.

California's experience with AB 5, with extensive job losses and necessities for numerous exemptions, serves as a clear warning. Independent workers appreciate their professional freedom, with a majority opting for it willingly. Let us take a stand to safeguard this choice by opposing such detrimental reclassification efforts.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Preserve Job Flexibility in NJ—Oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 8:00:39 AM

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Report Suspicious

The proposed rule N.J.A.C. 12:11 presents a critical threat to New Jersey's independent workforce. It aims to reclassify freelancers and contractors via an ABC test, similar to California's AB 5. That law led to systemic job losses and instability for independent professionals, offering us a clear picture of its potential consequences.

Independent workers value their freedom. A large percentage are satisfied with their current status, and these proposed changes could unjustly strip them of their chosen work arrangements. It is crucial for the New Jersey authorities to stand with these workers and reject the new rule to prevent stifling their economic freedom and opportunity.

From: John Natale
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 9:20:10 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

John Natale
102 N Lancaster Ave
Margate City, NJ 08402
JNatale@LincolnInvestment.com

From: Jonathan Peck
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 10:00:09 AM

This Message Is From an Untrusted Sender
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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

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Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Jonathan Peck
8 Hunts Mill Rd
Clinton, NJ 08809
jpeck@lincolninvestment.com

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Protect Workers' Rights: Oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 10:00:38 AM

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Report Suspicious

I am compelled to speak out against the proposed rule N.J.A.C. 12:11 by the New Jersey Department of Labor. By imposing an ABC test, this rule risks dismantling the livelihood and autonomy of independent workers in the state, many of whom are proud of their work based on self-direction and flexibility.

California's AB 5 provides a cautionary tale, revealing extensive economic harms and piecemeal legislative fixes. The overwhelming majority of freelancers and contractors value their independent status, which is under threat from this potential legislation. Support these workers by recognizing their voices and opposing the change.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Please oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 10:00:40 AM

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Report Suspicious

I wish to stress the importance of rejecting the proposed rule N.J.A.C. 12:11 by the New Jersey Department of Labor and Workforce Development. This rule threatens the foundations of independent work by introducing an ABC test that can potentially dismantle the livelihoods of countless individuals who choose to operate as freelancers, independent contractors, and gig workers.

Lessons from California show that similar measures under AB 5 led to massive job losses, harming not just independent workers but entire industries. The introduction of such a rule in New Jersey could cause irreversible damage to our local economy. Independent workers thrive under their current flexibility, with a significant portion choosing this path willingly. Let's protect their wishes by opposing this rule.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Keep NJ Independent Workers Free — Say No to N.J.A.C. 12:11
Date: Friday, June 27, 2025 10:00:41 AM

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Report Suspicious

The proposal for N.J.A.C. 12:11 poses a significant risk to New Jersey's freelance and gig economy. This rule, which involves adopting an ABC test for independent contractors, mirrors California's AB 5 which resulted in considerable job displacement and instability.

The choice of flexible work arrangements is cherished by many, with surveys indicating strong satisfaction among independent workers. Adopting N.J.A.C. 12:11 threatens this by trying to impose unsuitable classifications. Let us heed the lessons from California, protect job choice, and oppose this proposal to secure a thriving work environment for independent professionals.

Teamsters Local Union No. 469

Affiliated with The International Brotherhood of Teamsters

3400 Highway 35, Suite 7, Hazlet, New Jersey 07730
Telephone: (732) 888-0100 • Fax: (732) 888-1740

Michael Broderick, *President*
Michael Tkatch, *Vice President*
Vincent Minichino, *Secretary-Treasurer*
Christina Montorio, *Recording Secretary*
Joseph Morgan, *Trustee*
Thomas Hillas, *Trustee*
Curtiss Wells, *Trustee*

June 24, 2025

Mr. David Fish, Executive Director

Office of Legal and Regulatory Services

P.O. Box 110, 13th Floor

Trenton, New Jersey 08625-0110

Via email: david.fish@dol.nj.gov

Subject: NJ Department of Labor proposed rule change to

N.J.A.C. 12:11

Mr. David Fish,

On behalf of Teamsters Local 469 and Teamsters Joint Council 73, we express our strong support the NJ Department of Labor proposed rule change to N.J.A.C. 12:11 The new rules at N.J.A.C. 12:11 will codify the NJDOL's interpretation of the ABC test for independent contractor status under the New Jersey Unemployment Compensation Law, the New Jersey Wage and Hour Law, and the New Jersey Wage Payment law, among other New Jersey laws. This Proposal will protect workers' rights and ensure a level playing field for employers across the state.

Federal, state, and local labor laws provide extensive protection for employees, including the minimum wage, overtime pay, eligibility for state and federal unemployment insurance, Workers' Compensation coverage, and employer contributions toward Social Security and Medicare. Many employers, however, exploit the ambiguity in current government regulations to avoid contributing their share toward these worker protections by misclassifying some of their workers as independent contractors rather than as employees.

Misclassification is rampant in many industries where the Teamsters represent employees including construction, ride share and trucking. When employers use the 1099 loophole to misclassify their workers and cheat the system, they gain an unfair economic advantage against the law-abiding companies they compete against. Misclassified workers are prevented from organizing a union and fighting for better conditions. Companies that play by the rules, which are often Teamster companies are often driven out of business because of this unfair competition.

Take for example Toll Global Forwarding, a port trucking company formerly located in Carteret, NJ that hauled containers on and off the ports for years. They were a good Teamster company that provided workers with an hourly rate, healthcare and secure retirement. Toll paid payroll taxes including social security, unemployment and disability. Toll did the same kind of work that many port trucking companies who misclassify their workers do, and ultimately, they were driven out of business by the unfair competition these rule breaking companies engaged in. Toll simply could not compete with the lawbreakers who saved up to 30% on their employment costs and put all the cost for truck

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Please oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 11:00:40 AM

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Report Suspicious

I urge the New Jersey Department of Labor and Workforce Development to reject the proposed rule N.J.A.C. 12:11, which is set to redefine the status of independent contractors. Implementing the ABC test threatens the income of many independent workers who contribute significantly across various state industries.

California faced significant backlash with their similar AB 5 law, leading to unintended job losses and economic disruption. The majority of independent workers in New Jersey are content with their flexible work mode, many having deliberately chosen it. By foreseeing these risky outcomes, let us strive to protect the preferred livelihood of countless residents.

From: John Fitzgerald
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 11:40:12 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

John Fitzgerald
137 Brookside Way
Mullica Hill, NJ 08062
john@fitzgeraldFG.com

From: Robert Rafano
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 11:50:09 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Robert Rafano
32 Fairview Ave
East Brunswick, NJ 08816
rob@ffsadvisor.com

From: William Blanche
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 11:50:12 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

William Blanche
325 Springhouse Ln
Moorestown, NJ 08057
wblanche@lincolninvestment.com

From: Ryan Flynn
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Friday, June 27, 2025 12:00:10 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

Like other advisors, I must be associated with a broker-dealer to meet federal and state requirements — but this is a legal compliance measure, not an employment relationship. The broker-dealer actually provides me with services that help me meet my clients' needs — similar to how any business might use software, IT, or legal support. I control how I run my business, who I work with, and how I serve my clients.

Mischaracterizing this relationship as employment not only threatens my livelihood but could lead to fewer financial advisors operating in New Jersey — a blow to the local economy and to residents who rely on our expertise. If advisors are pushed out or driven to other states, clients here will suffer.

I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Ryan Flynn
5 Greentree Ctr
Marlton, NJ 08053
ref@vallumwealth.com

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Please oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 12:00:40 PM

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Report Suspicious

Dear David Fish,

[highlight=transparent]I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. [/highlight]

[highlight=transparent]Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.[/highlight]

[highlight=transparent]We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. [/highlight]

[highlight=transparent]Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. [/highlight]

[highlight=transparent]The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.[/highlight]

[highlight=transparent]Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.[/highlight]

Yours sincerely,
sonya barnes
66 lindsley place
East Orange, NJ 07018
bsonya341@gmail.com

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 12:00:40 PM

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Report Suspicious

I write with urgency to ask for the rejection of the proposed N.J.A.C. 12:11 rule. This modification, introducing an ABC operational test, constitutes a severe threat to independent contractors' livelihoods, bearing potential for widespread job loss comparable to California's AB 5 experience.

The independent workforce in New Jersey is vibrant, with numerous individuals having consciously chosen this path. It's crucial that these voices are acknowledged as they continuously oppose reclassification measures. Let us preserve the work flexibility they value and decline to adopt measures reminiscent of the detrimental AB 5.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Please oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 12:00:43 PM

This Message Is From an Untrusted Sender
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Report Suspicious

Dear David Fish,

[highlight=transparent]I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. [/highlight]

[highlight=transparent]Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.[/highlight]

[highlight=transparent]We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. [/highlight]

[highlight=transparent]Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. [/highlight]

[highlight=transparent]The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.[/highlight]

[highlight=transparent]Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.[/highlight]

Yours sincerely,
jean hunt
325 dor chester avenue
Cranford, NJ 07016
jhunt2059@comcast.net

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Don"t Let N.J.A.C. 12:11 Derail NJ"s Workforce
Date: Friday, June 27, 2025 12:00:46 PM

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Report Suspicious

I am writing to voice my concern regarding the New Jersey Department of Labor and Workforce Development's proposed N.J.A.C. 12:11 rule. This rule endorses an ABC test for classifying independent contractors, threatening to undermine thousands of workers across New Jersey by altering their employment status adversely.

California's experience with AB 5, with extensive job losses and necessities for numerous exemptions, serves as a clear warning. Independent workers appreciate their professional freedom, with a majority opting for it willingly. Let us take a stand to safeguard this choice by opposing such detrimental reclassification efforts.

From: Joseph Norris
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 12:20:39 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Joseph Norris
769 Cornwallis Dr
Mount Laurel, NJ 08054
joe.norris@lpl.com

From: Jeffrey Faller
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Friday, June 27, 2025 12:30:09 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

Like other advisors, I must be associated with a broker-dealer to meet federal and state requirements — but this is a legal compliance measure, not an employment relationship. The broker-dealer actually provides me with services that help me meet my clients' needs — similar to how any business might use software, IT, or legal support. I control how I run my business, who I work with, and how I serve my clients.

Mischaracterizing this relationship as employment not only threatens my livelihood but could lead to fewer financial advisors operating in New Jersey — a blow to the local economy and to residents who rely on our expertise. If advisors are pushed out or driven to other states, clients here will suffer.

I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Jeffrey Faller
83 Benjamin St Fl 2
Cranford, NJ 07016
jfaller@lincolninvestment.com

From: Jake Barnes
To: Fish, David [DOL]
Subject: [EXTERNAL] Corrected testimony from 6/23 hearing
Date: Friday, June 27, 2025 12:50:05 PM
Attachments: image001.png
Jake Barnes Corrected Testimony.pdf

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Director Fish,

Thank you for the opportunity to testify in support of the new rules regarding the ABC test. After testifying, our team realized we had made an inadvertent error in the testimony that I would like to correct. Specifically, I would like to clarify the information presented regarding the Berkeley Labor Center and Economic Policy Institute studies. The corrected details are reflected in footnotes 4 and 6 of the amended testimony, which is attached here.

We also plan to submit more extensive written comments before the August deadline, but wanted to make sure the record was corrected as soon as possible as you continue your work on this rulemaking process.

Thank you again for the opportunity to provide input at the hearing and to correct the record. Please do not hesitate to contact me with any questions.

Thank you,
Jake

Jake Barnes
Research Project Manager | Workplace Justice Lab
School of Management and Labor Relations

RUTGERS
School of Management and Labor Relations

workplace justice lab@RU

Members of the Department of Labor and Workforce Development:

My name is Jake Barnes, and I am the Research Director at the Workplace Justice Lab at Rutgers University.

I am here to voice the Workplace Justice Lab's support of the New Jersey Department of Workforce Development's proposed rule to codify the ABC test into its regulations. The ABC test provides a clear, three-pronged standard, reducing ambiguity for employers, workers, and those working to enforce the law. Compared to multi-factor balancing tests (like the IRS or common law tests), the ABC test is easier to apply and understand, leading to more consistent, just outcomes. When employers pay workers as independent contractors and not as employees, both workers and the general public lose. Implementing the ABC test is an important tool in the NJ Department of Labor's toolbox so that it can better enforce its wage and hour laws. It will provide clarity to investigators and the regulated community, and will allow the NJ Department of Workforce Development to strategically use its resources to enforce the law and not play whack-a-mole with employers trying to skirt their employment obligations by hiding behind regulatory uncertainty.

Wage theft is a $13 billion dollar annual problem,[1] with workers across the United States coming up short in their paychecks despite working the hours. Wage theft can occur in a variety of ways, but the form of wage theft that is most salient to the proposed rule is when employers illegally pay workers on an independent contractor basis. This can look like domestic workers getting paid as "1099 workers," or cleaners working for a janitorial company being told that they are in "business for themselves," despite the janitorial company controlling every aspect of their work.

When a worker is misclassified, the employer may not be paying the worker minimum wage or overtime, or providing other statutorily mandated requirements (like paid sick leave). Misclassification also has a social cost, because these employers do not pay state and federal income taxes for these workers. This means those workers aren't eligible for workers' compensation or unemployment insurance, and the state is unable to collect valuable tax dollars.

[1] Daniel J. Galvin, *Alt-Labor and the New Politics of Workers' Rights* (2024), New York, NY: Russell Sage Foundation.

Between 10–30% of employers nationally misclassify at least some of their workforce as "independent contractors."[2] A 2022 Berkeley Labor Center study noted that between 12.4 percent to 20.5 percent of the U.S. construction workforce was either misclassified as contractors or paid off-the-books.[3] [4] The Economic Policy Institute has found that independent contractors in New Jersey across 11 occupations that are often misclassified lose between 19% and 37% of their total compensation compared with W-2 employees.[5] [6] Vulnerable workers, like those paid close to the minimum wage floor, like home health aides, construction workers, and janitors, are most susceptible to minimum wage violations. And, minimum wage violations hurt low-wage workers the most. In 2022, the Workplace Justice Lab found that New Jersey workers paid below minimum wage lost on average $1.62/hour—about 20% of the legal minimum wage.[7] I don't know about you, but I can't afford to leave 20% of my paycheck on the table each week. Luckily, this rule will help deter the misclassification of employees and, in turn, help put that 20% back in workers' pockets.

The rule will raise awareness in the regulatory community by making it clear that the onus of proving that a worker is an independent contractor will be on the employer. Adding regulatory clarity will also allow the NJ Department of Workforce Development to streamline its investigations because it will not have to waste valuable and finite resources proving that workers are employees covered by its laws.

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[2] U.S. Gov't Accountability Off., *Employee Misclassification: Improved Coordination, Outreach, and Targeting Could Better Ensure Detection and Prevention,* GAO-09-717 (Aug. 10, 2009), https://www.gao.gov/assets/gao-09-717.pdf.

[3] Ken Jacobs, Kuochih Huang, Jenifer MacGillvary & Enrique Lopezlira, *The Public Cost of Low-Wage Jobs in the New Jersey Construction Industry* (Mar. 2022), UC Berkeley Labor Center, https://laborcenter.berkeley.edu/the-public-cost-of-low-wage-jobs-in-the-new-jersey-construction-industry (citing Russell Ormiston, Dale Belman, and Mark Erlich, *An empirical methodology to estimate the incidence and costs of payroll fraud in the construction industry*, United Brotherhood of Carpenters and Joiners of America and Institute for Construction Economic Research (2020), available at http://iceres.org/wp-content/uploads/2020/06/ICERES-Methodology-for-Wage-and-Tax-Fraud.pdf).

[4] Due to an inadvertent error and to add additional clarity, WJL is amending this sentence as follows "A ~~2018~~ 2022 Berkeley Labor Center study ~~estimated~~ noted that between 12.4 percent to 20.5 percent of the U.S. ~~New Jersey's~~ construction workforce was either misclassified as contractors or paid off-the-books."

[5] Adewale A. Maye, Daniel Perez & Margaret Poydock, *Misclassifying Workers as Independent Contractors Is Costly for Workers and States* (Jan. 22, 2025), Econ. Pol'y Inst., https://www.epi.org/publication/misclassifying-workers-2025-update/, at Appendix Table 2.

[6] Due to an inadvertent error and to add additional clarity, WJL is amending this sentence as follows, "The Economic Policy Institute has found that independent contractors in New Jersey across 11 occupations that are often misclassified ~~as independent contractors, those workers~~ lose between 19~~7~~% and 37~~4~~% of their total compensation compared with W-2 ~~properly classified~~ employees."

[7] Daniel J. Galvin, Janice Fine & Jenn Round, *Minimum Wage Violations in New Jersey: Toward Strategic Enforcement* (June 2022), Workplace Justice Lab @ Rutgers Univ., https://smlr.rutgers.edu/sites/default/files/Documents/Centers/WJL/wjlMWstudy_rev06-22.pdf.

Instead, the regulations will presume coverage and the employer will have to show otherwise. This regulatory approach will conserve valuable agency resources and allow wage and hour investigators to focus on strategic enforcement cases.

This rule is not a drag net designed to take away freedom and discretion from business owners, but is designed to protect vulnerable workers from exploitation so that they earn the basics: minimum wage, overtime, unemployment insurance, and workers' compensation. No one should get robbed of their hard-earned wages only to have justice delayed because an employer is playing a shell game of who is in charge.

For these reasons, the Workplace Justice Lab supports the Department's proposal.

From: Frank Euvino
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 12:50:07 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Frank Euvino
385 State Route 24
Chester, NJ 07930
frank.euvino@lpl.com

From: Harold Hill
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 12:52:18 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Harold Hill
136 New Brooklyn Rd
Sicklerville, NJ 08081
hhill@lincolninvestment.com

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Please oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 1:00:37 PM

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Report Suspicious

I urge the New Jersey Department of Labor and Workforce Development to reject the proposed rule N.J.A.C. 12:11, which is set to redefine the status of independent contractors. Implementing the ABC test threatens the income of many independent workers who contribute significantly across various state industries.

California faced significant backlash with their similar AB 5 law, leading to unintended job losses and economic disruption. The majority of independent workers in New Jersey are content with their flexible work mode, many having deliberately chosen it. By foreseeing these risky outcomes, let us strive to protect the preferred livelihood of countless residents.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Please oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 1:00:40 PM

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Report Suspicious

The introduction of N.J.A.C. 12:11 by the New Jersey Department of Labor signals a troubling potential shift for our independent workforce. By adopting the ABC test, the livelihoods of numerous freelancers and contractors across New Jersey face great uncertainty.

California's experience with AB 5 provides clear evidence of the potential fallout from such measures: job loss and disruption even beyond independent roles. This reality threatens to unsettle those who separate themselves professionally by choice, warranting a decisive stance against this rule. Let us unite to prevent these impacts and support the voices of independent workers today.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Please oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 1:00:41 PM

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Report Suspicious

I wish to stress the importance of rejecting the proposed rule N.J.A.C. 12:11 by the New Jersey Department of Labor and Workforce Development. This rule threatens the foundations of independent work by introducing an ABC test that can potentially dismantle the livelihoods of countless individuals who choose to operate as freelancers, independent contractors, and gig workers.

Lessons from California show that similar measures under AB 5 led to massive job losses, harming not just independent workers but entire industries. The introduction of such a rule in New Jersey could cause irreversible damage to our local economy. Independent workers thrive under their current flexibility, with a significant portion choosing this path willingly. Let's protect their wishes by opposing this rule.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Keep NJ Independent Workers Free — Say No to N.J.A.C. 12:11
Date: Friday, June 27, 2025 1:00:43 PM

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Report Suspicious

The proposal for N.J.A.C. 12:11 poses a significant risk to New Jersey's freelance and gig economy. This rule, which involves adopting an ABC test for independent contractors, mirrors California's AB 5 which resulted in considerable job displacement and instability.

The choice of flexible work arrangements is cherished by many, with surveys indicating strong satisfaction among independent workers. Adopting N.J.A.C. 12:11 threatens this by trying to impose unsuitable classifications. Let us heed the lessons from California, protect job choice, and oppose this proposal to secure a thriving work environment for independent professionals.

From: AGP - Berman & Co
To: Fish, David [DOL]
Subject: [EXTERNAL] Preserve Job Flexibility in NJ—Oppose N.J.A.C. 12:11
Date: Friday, June 27, 2025 1:00:45 PM

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Report Suspicious

The proposed rule N.J.A.C. 12:11 presents a critical threat to New Jersey's independent workforce. It aims to reclassify freelancers and contractors via an ABC test, similar to California's AB 5. That law led to systemic job losses and instability for independent professionals, offering us a clear picture of its potential consequences.

Independent workers value their freedom. A large percentage are satisfied with their current status, and these proposed changes could unjustly strip them of their chosen work arrangements. It is crucial for the New Jersey authorities to stand with these workers and reject the new rule to prevent stifling their economic freedom and opportunity.

From: Anthony Sandomierski
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 1:10:13 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Anthony Sandomierski
109 Longfellow Ave
Toms River, NJ 08753
anthony@oujowealth.com

From: David Cohen
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 1:20:09 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

David Cohen
3 Nicole Dr
Somerset, NJ 08873
david.cohen@sterlingfinancialmgt.com

From: Michael Harriett
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 1:20:10 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Michael Harriett
115 York St
Lambertville, NJ 08530
mharriett@lincolninvestment.com

From:	media
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Public Comment Submission on PRN 2025-051 – ABC Test; Independent Contractors
Date:	Friday, June 27, 2025 1:27:23 PM
Attachments:	Public Comments PRN 2025-051 Batch 2.xlsx Public Comments On PRN 2025-051 Batch 2.pdf

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Hi Mr. Fish,

Attached here, please find an additional 122 public comments from concerned New Jerseyans related to PRN 2025-051 -- ABC Test for Independent Contractors. Contact information for each commenter is included on each individual letter. As with the previous batch I sent over, these letters were also sent to your email directly, but I am sending them here as well.

A spreadsheet is attached that notes every commenter and their personal information, including contact information.

If you could confirm receipt of these comments, it would be much appreciated.

Thank you again,
Charlyce

FIRST NAME	LAST NAME	ADDRESS	CITY	STATE	ZIP
MARK	NIXON	303 NEW JERSEY RD	BROOKLAWN	NJ	08030
MELISSA	BURNETT	98 OAK ST APT 2616	CLEMENTON	NJ	08021
DAUDA	KARGBO	159 BAIER AVE APT 45A	SOMERSET	NJ	08873
EDWIN	REMUS	133 7TH AVE APT 2R	NEWARK	NJ	07104
EDDIE	RIVERA	1001 BUFFALO AVE	GG HARBOR CI	NJ	08215
LAWRENCE	PURVIS	118 MAPLE AVE	NEWARK	NJ	07112
COLUMBUS	OBERRY	77 W MAIN ST	SOMERVILLE	NJ	08876
ADRIAN	BUDD	473 REDWOOD AVE	GALLOWAY	NJ	08205
RAYMOND	ROUSE	8 LOCUST ST	JERSEY CITY	NJ	07305
TOMMASO	TROIA	216 WATER STREET	BELVIDERE	NJ	07823
RONALD	BOOKERIII	1216 GRAY AVE	UNION	NJ	07083
JUDITH	REID	178 LIBERTY ROAD	ENGLEWOOD	NJ	07631
THERESA	CORMIER	8 LENA STREET	SAYREVILLE	NJ	08872
ALEX	BONIFACIO	2-69 SUNNYSIDE DRIVI	FAIR LAWN	NJ	07410
RICHARD	CARRADINI	18 WHITE BIRCH TRL	ROCKAWAY	NJ	07866
DENISE	WACKES	214 ST. JAMES AVENUE	ERCHANTVILL	NJ	08109
SHIRLEY	ENG	2 SKYTOP TERRACE	MONTCLAIR	NJ	07043
RUTH	COLMENAR	2076 BERWYN ST.	UNION	NJ	07083
PENNIE	DENECHAUD	26 BREWSTER CT	PENNINGTON	NJ	08534
PRINCE	JUTY	10 HAWTHORNE PL	EAST ORANGE	NJ	07018
JOELLE	MAIER	20 BEECHWOOD ROAD	CRESSKILL	NJ	07626
BRIAN	GARRAHAN	368 KINDERKAMACK RD	ORADELL	NJ	07649
ELOISE	CHIN	137 GARRETT DR, NJ	LONG BRANCH	NJ	07740
KIM	SHANNON	304 ERIAL ROAD APT10	SICKLERVILLE	NJ	08081
SANZARI	SANZARI	2012186189	CARLSTADT	NJ	07072
THOMAS	DENNY	100 GEORGE ST.	SPOTSWOOD	NJ	08884
DANNY RAY	BRYANT SR	32PERSHING AVE. APT	CARTERET	NJ	07008
DEBRA	WALKER	60 MADISON STREET	HOBOKEN	NJ	07030
GEORGE	MORTENSEN	18 CLEMBIL COURT	PERTH AMBOY	NJ	08861
MAUREEN	LAMBE	39 RAMSEY AVENUE	KEANSBURG	NJ	07734
BRIAN	MURPHY	18 HIGHFIELD LANE	RUTHERFORD	NJ	07070
JOHN	ZOFREA	2 PILATUS PLATZ UNIT	FREEHOLD	NJ	07728
NORMA	SERIO	8 CLOVER LN	BELVIDERE	NJ	07823
MARIA	ABOUZIED	144 PASSAIC AVE	BELLEVILLE	NJ	07109
HAYLEY	MCATEER	706 BROOKSIDE DRIVE	TOMS RIVER	NJ	08753
STEVE	ROWACK	8 SPRING MEADOW W	JAMESBURG	NJ	08831
BARBARA	TOKAR	2 HILLSIDE DRIVE	OUNT ARLINGT	NJ	07856
ASHLEY	WILSON	6 KETCH COURT	E EGG HARBOR	NJ	08087
PASQUALE	IZZO	425 DREW AVENUE	ANOKA HARBO	NJ	08734
PATRICIA	FATTORUSSO	93 FRONT ST	PATERSON	NJ	07522
CARL	MCKENITH	86 E DUBOIS CT	ENGLEWOOD	NJ	07631
CHRISIE	INOCENCIO	143 RAMSEY AVE	KEANSBURG	NJ	07734
DENISE	ARMOUR	692 SO. 20TH STREET	NEWARK	NJ	07103
LINDA	MAGEE	0 NORTH PASSAIC AVE	CHATHAM	NJ	07928
PAMELA	YOUNGER	113 JAMES ST	PERTH AMBOY	NJ	08861

LORI	TENEN	5 BARTON CREEK RD	JACKSON	NJ	08527
FELIX	JAY	109 KEEN STREET	PATERSON	NJ	07524
KATHERINE	WILLIAMS	COMMERCE STREET,TF	BRIDGETON	NJ	08302
HALLE	STRADFORD	6 168 ROSA PARKS BL\	PATERSON	NJ	07501
STEVE	CARTY	3600 NESCO RD 08037	HAMMONTON	NJ	08037
POONAM	MANKANI	67 BARNARD	PARAMUS	NJ	07652
SUNITA	MEHTA	112 HWY 34	OLD BRIDGE	NJ	08857
RUSSELL	AUERBACH	129 LAKEVIEW DR	OLD TAPPAN	NJ	07675
ASHLEY	BODON	33 HIRSCH AVE	TRENTON	NJ	08690
VICKI	SIAMTSIOURIS	58 CHESTNUT ST	RTH ARLINGT	NJ	07031
GERTRUDE	MANGUM	275GLENWOOD AVE N	BLOOMFIELD	NJ	07003
SHIRLEY	ROSENZWEIG	419 N ESSEX AVE	MARGATE CITY	NJ	08402
SAFAES	ESSAHALE	510 PLAINFIELD ROAD	EDISON	NJ	08820
ELIMER	SANTOS	2 OLD FARM RD	SICKLERVILLE	NJ	08081
JERRY	KATZENSTEIN	33CRATER AVE	WHARTON	NJ	07885
MELANIE	OLLINGSWORT	66 S FRANKLINTPKE	RAMSEY	NJ	07446
DOMINIC	SEDICINO	28 BEVERLY LANE	MANAHAWKIN	NJ	08050
BRENDA	REID	BEACH AVENUE	ATLANTIC CITY	NJ	08401
MARKAND	COOKE	5 JEFFREY WAY	PISCATAWAY	NJ	08854
MARIANNE	FOSS	46 SUNNYBROOK RD	STRATFORD	NJ	08084
SHERRY	SLOAT	2145 WHITESVILLE RD	TOMS RIVER	NJ	08755
MAKAYLA	DEMARCO	S SOUTH LAUREL AVEN	ZLET TOWNSH	NJ	07730
RICHARD	BENSER	319 PALISADE AVE	CLIFFSIDE PAR	NJ	07010
EVELYN	AMBROSE	200 OLD HOOK ROAD	RRINGTON PA	NJ	07640
ROBBIN	RYAN	58 HUNTERS LN	SPARTA	NJ	07871
JULIE	SFERRAZZA	18 PHIPPS CT	FLEMINGTON	NJ	08822
EUGENE	DELLITALIA	18 SPOTSWOOD AVE	NROE TOWNS	NJ	08831
JACQUELINE	GILLICK	41 SLAPE AVE	SALEM	NJ	08079
DAPHNEY	JOB	107 REGINA AVE	STANHOPE	NJ	07874
JORGE	MEJIA	375 CHESTNUT AVE	JTH HACKENS	NJ	07606
EDGAR	MUNIZ	269 DESOTO PLACE	FAIRVIEW	NJ	07022
MARIA	BASILE	17 E ATLANTIC AVE 50	ADDON HEIGH	NJ	08035
ANNE	COLUCCI	ST MARYÃ¢Â,¬Â„¢S DRI	SUCCASUNNA	NJ	07876
RAYMOND	CORBETT	37NMAPLE AVE	MARLTON	NJ	08053
JOHN	REEDY	7 NIGHTINGALE SQUA	MAYS LANDING	NJ	08330
KIMBERLY	HANNA	1104 IGER WAY	BAYVILLE	NJ	08721
JANICE	GEILER	6 KEVAN PL	MIDDLETOWN	NJ	07748
JULIA	DELOSSANTOS	179 FRONT STREET	UTH PLAINFIE	NJ	07080
SHIRLEY	WALKER	526 JACKSON AVENUE	GLASSBORO	NJ	08028
ANA M	SOTO	76 ORANGE ST 2 FLOO	NEWARK	NJ	07103
DALE	RIZZO	39 INDEPENDENCE DR	NROE TOWNS	NJ	08831
CATHERINE	OREILLY	152 S MANOR CT	ALL TOWNSH	NJ	07719
MAUREEN	BEARDS	124 RADTKE ROAD	RANDOLPH	NJ	07869
ALFIE	HICKS	RHODE ISLAND AVEN	EAST ORANGE	NJ	07018
RALPH	GROFF	1104 MARKET ST.	BELLMAWR	NJ	08031
ROBERT	KEENAN	16 CHELSEA ROAD	OLD BRIDGE	NJ	08857
MODNISH	SHAH	220 LITTLETON ROAD	PARSIPPANY	NJ	07054
SHERINE	ROBINSON	14 VERMEER DRIVE	SOUTH AMBOY	NJ	08879
BERTA I	AZAR MAZARIE	4212WYNDHURST DR	PLAINSBORO	NJ	08536
EDWARD	MCNAMARA	4594 TUCKAHOE RD	FRANKLINVILLE	NJ	08322
ARLENE	MAXWELL	55PLUMTREE LANE	WILLINGBORO	NJ	08046
JENNIFER	TROESE	16 CAMPBELL DR	EATONTOWN	NJ	07724
GEORGETTE	EBLE	442 SHORE RD	SOMERS POINT	NJ	08244
SHAWONDA	SWAIN	32 LAIDLAW AVE	JERSEY CITY	NJ	07306

KATE	DAISEY	17 SWATHMORE AVE	OUCESTER CI	NJ	08030
OSTHA	HARLEY	197 CENTRAL PL	ORANGE	NJ	07050
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MALIK	CHEATHAM	303ELM ST	PERTH AMBOY	NJ	08861
MONICA	HOPEWELL	3 N. DR.MLK BOULEVAR	ATLANTIC CITY	NJ	08401
JEREMY	LOPEZ	132 CHESTER AVENUE	NEWARK	NJ	07104
MILDRED	COLON	3716 PARK AVE	WEEHAWKEN	NJ	07086
FREDRICA	BARNES	619 COURT STREET	LIZABETHPOR	NJ	07206
JAMES	MONROE	319 SHILLING DR	SOMERSET	NJ	08873
MICHELLE	MOWREY	779 SOUTH BLVD	PHILLIPSBURG	NJ	08865
ANNETTE	AKINS	60 DWIGHT ST	JERSEY CITY	NJ	07305
WINDOW	LEBRON	) MARSHALL DRIVE APT	HOBOKEN	NJ	07030
MELISSA	MORALES	143 HAMILTON BLVD	OUTH PLAINFIE	NJ	07080
THOMAS	WATTS	180 NORWOOD AVE	LONG BRANCH	NJ	07740
ANNIE	HILL	17 SOUTH PINE STREE	BRIDGETON	NJ	08302
ANDREIA	SIMOES	6 GALLOPING HILL ROA	UNION	NJ	07083
TISHA	BURGESS	47 CLEVELAND STREE	ORANGE	NJ	07050
MURRAY	PORIGOW	1301 LAUREL OAK RD	VOORHEES	NJ	08043
LEO	GUYETTE	41 HARTFORD ROAD	WHITING	NJ	08759
OKSANA	STERANKA	EN DRIVE,EAST HANO	EAST HANOVER	NJ	07936
EVELYN	MCMILLIAN	162 WILKINSON AVE	JERSEY CITY	NJ	07305
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_AURALEELUCEY17@GMAIL.COM	###########

From: mark nixon (mnixon@virtua.org)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
mark nixon
303 new jersey rd
Brooklawn, NJ 08030
mnixon@virtua.org

From: melissa burnett (mdot52@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
melissa burnett
98 oak st apt 2616
Clementon, NJ 08021
mdot52@yahoo.com

From: dauda kargbo (daudakargbo77@gmail.com)

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Yours sincerely,
dauda kargbo
159 baier ave apt 45a
Somerset, NJ 08873
daudakargbo77@gmail.com

From: edwin remus (evemus48@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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edwin remus
133 7th ave apt 2r
Newark, NJ 07104
evemus48@gmail.com

From: eddie rivera (eddierivera526@gmail.com)

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Yours sincerely,
eddie rivera
1001 buffalo ave
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eddierivera526@gmail.com

From: lawrence purvis (purvislawrence16@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
lawrence purvis
118 maple ave
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From: columbus oberry (oberrycolumbus@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
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From: adrian budd (adrianbudd088@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
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adrianbudd088@gmail.com

From: raymond rouse (raymondrouse57@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
raymond rouse
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From: tommaso troia (tommasotroia5@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
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From: ronald bookeriii (mrbooker84@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
ronald bookeriii
1216 gray ave
Union, NJ 07083
mrbooker84@gmail.com

From: judith reid (reidjudith45@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
judith reid
178 liberty road
Englewood, NJ 07631
reidjudith45@gmail.com

From: theresa cormier (theresalcormier1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
theresa cormier
8 lena street
Sayreville, NJ 08872
theresalcormier1@gmail.com

From: alex bonifacio (alexlofbcf@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
alex bonifacio
12-69 sunnyside drive
Fair Lawn, NJ 07410
alexlofbcf@gmail.com

From: richard carradini (rjcarradini@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
richard carradini
18 white birch trl
Rockaway, NJ 07866
rjcarradini@gmail.com

From: denise wackes (deni3282@msn.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
denise wackes
214 st. james avenue
Merchantville, NJ 08109
deni3282@msn.com

From: shirley eng (saeng@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
shirley eng
2 skytop terrace
Montclair, NJ 07043
saeng@yahoo.com

From: ruth colmenar (ruthcllanes@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
ruth colmenar
2076 berwyn st.
Union, NJ 07083
ruthcllanes@gmail.com

From: pennie denechaud (ddenechaud1@verizon.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
pennie denechaud
26 brewster ct
Pennington, NJ 08534
ddenechaud1@verizon.net

From: prince juty (princejjuty999@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
prince juty
10 hawthorne pl
East Orange, NJ 07018
princejjuty999@gmail.com

From: joelle maier (joellemaier@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
joelle maier
20 beechwood road
Cresskill, NJ 07626
joellemaier@gmail.com

From: brian garrahan (telecom9422@optimum.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
brian garrahan
368 kinderkamack rd
Oradell, NJ 07649
telecom9422@optimum.net

From: eloise chin (eloisechin33393@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
eloise chin
137 garrett dr, nj
Long Branch, NJ 07740
eloisechin33393@gmail.com

From: kim shannon (kshannon237@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
kim shannon
304 erial road apt101
Sicklerville, NJ 08081
kshannon237@yahoo.com

From: sanzari sanzari (jkas74@verizon.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
sanzari sanzari
2012186189
Carlstadt, NJ 07072
jkas74@verizon.net

From: thomas denny (hwilt924@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
thomas denny
100 george st.
Spotswood, NJ 08884
hwilt924@gmail.com

From: danny ray bryant sr (naeembryant25@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
danny ray bryant sr
32pershing ave. apt 2
Carteret, NJ 07008
naeembryant25@gmail.com

From: debra walker (debrawalker17@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
debra walker
60 madison street
Hoboken, NJ 07030
debrawalker17@gmail.com

From: george mortensen (georgie03578@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
george mortensen
18 clembil court
Perth Amboy, NJ 08861
georgie03578@yahoo.com

From: maureen lambe (lholybull@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

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maureen lambe
39 ramsey avenue
Keansburg, NJ 07734
lholybull@aol.com

From: brian murphy (babmc64@msn.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
brian murphy
18 highfield lane
Rutherford, NJ 07070
babmc64@msn.com

From: john zofrea (jzof@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
john zofrea
112 pilatus platz unit d
Freehold, NJ 07728
jzof@yahoo.com

From: norma serio (onormjean4@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
norma serio
8 clover ln
Belvidere, NJ 07823
onormjean4@aol.com

From: maria abouzied (mariaabouzied@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
maria abouzied
144 passaic ave
Belleville, NJ 07109
mariaabouzied@icloud.com

From: hayley mcateer (hayleymcateer1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
hayley mcateer
706 brookside drive
Toms River, NJ 08753
hayleymcateer1@gmail.com

From: steve rowack (steverowack@verizon.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
steve rowack
228 spring meadow way
Jamesburg, NJ 08831
steverowack@verizon.net

From: barbara tokar (bct17@optonline.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
barbara tokar
2 hillside drive
Mount Arlington, NJ 07856
bct17@optonline.net

From: ashley wilson (ashley.mize@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
ashley wilson
6 ketch court
Little Egg Harbor Twp, NJ 08087
ashley.mize@yahoo.com

From: pasquale izzo (pasquale.c.izzo@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
pasquale izzo
425 drew avenue
Lanoka Harbor, NJ 08734
pasquale.c.izzo@gmail.com

From: patricia fattorusso (mookerluvsme@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
patricia fattorusso
93 front st
Paterson, NJ 07522
mookerluvsme@gmail.com

From: carl mckenith (carlmckenith5@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
carl mckenith
86 e dubois ct
Englewood, NJ 07631
carlmckenith5@gmail.com

From: chrisie inocencio (c.inocencio1022@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
chrisie inocencio
143 ramsey ave
Keansburg, NJ 07734
c.inocencio1022@gmail.com

From: denise armour (darmour24@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
denise armour
692 so. 20th street
Newark, NJ 07103
darmour24@gmail.com

From: linda magee (shonamary43@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
linda magee
10 north passaic ave.
Chatham, NJ 07928
shonamary43@gmail.com

From: pamela younger (pamelayounger66@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
pamela younger
113 james st
Perth Amboy, NJ 08861
pamelayounger66@yahoo.com

From: lori tenen (lbtenen@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
lori tenen
5 barton creek rd
Jackson, NJ 08527
lbtenen@yahoo.com

From: felix jay (qquick322@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
felix jay
109 keen street
Paterson, NJ 07524
qquick322@gmail.com

From: katherine williams (missrosiebaby57@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
katherine williams
868 e. commerce street,trir #117
Bridgeton, NJ 08302
missrosiebaby57@gmail.com

From: halle stradford (stradfordhalle289@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
halle stradford
166 168 rosa parks blvd
Paterson, NJ 07501
stradfordhalle289@gmail.com

From: steve carty (stephencarty67@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
steve carty
3600 nesco rd 08037
Hammonton, NJ 08037
stephencarty67@icloud.com

From: poonam mankani (gnankani@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
poonam mankani
67 barnard
Paramus, NJ 07652
gnankani@hotmail.com

From: sunita mehta (ssunta@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
sunita mehta
112 hwy 34
Old Bridge, NJ 08857
ssunta@gmail.com

From: russell auerbach (russelljaime@yahoo.com)

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Yours sincerely,
russell auerbach
129 lakeview dr
Old Tappan, NJ 07675
russelljaime@yahoo.com

From: ashley bodon (abodon22@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
ashley bodon
33 hirsch ave
Trenton, NJ 08690
abodon22@gmail.com

From: vicki tsiamtsiouris (tsiamtsiouris.vicki@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
vicki tsiamtsiouris
58 chestnut st
North Arlington, NJ 07031
tsiamtsiouris.vicki@gmail.com

From: gertrude mangum (gertrudemangum00@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
gertrude mangum
275glenwood ave nj
Bloomfield, NJ 07003
gertrudemangum00@gmail.com

From: shirley rosenzweig (alan-r@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
shirley rosenzweig
419 n essex ave
Margate City, NJ 08402
alan-r@comcast.net

From: safaes essahale (essahalesafae@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
safaes essahale
510 plainfield road
Edison, NJ 08820
essahalesafae@gmail.com

From: elimer santos (elimersantos2013@gmail.com)

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Yours sincerely,
elimer santos
2 old farm rd
Sicklerville, NJ 08081
elimersantos2013@gmail.com

From: jerry katzenstein (jerrystotzkatz@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
jerry katzenstein
33crater ave
Wharton, NJ 07885
jerrystotzkatz@gmail.com

From: melanie hollingsworth (mjh1563@gmail.com)

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melanie hollingsworth
66 s franklintpke
Ramsey, NJ 07446
mjh1563@gmail.com

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Yours sincerely,
dominic sedicino
28 beverly lane
Manahawkin, NJ 08050
bellesed@yahoo.com

From: brenda reid (brendareid185@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
brenda reid
beach avenue
Atlantic City, NJ 08401
brendareid185@gmail.com

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Yours sincerely,
markand cooke
5 jeffrey way
Piscataway, NJ 08854
mcooke624@gmail.com

From: marianne foss (zoeygirl0167@yahoo.com)

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Yours sincerely,
marianne foss
46 sunnybrook rd
Stratford, NJ 08084
zoeygirl0167@yahoo.com

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Yours sincerely,
sherry sloat
2145 whitesville rd
Toms River, NJ 08755
sloatsherry76@gmail.com

From: makayla demarco (makayladmarco13@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
makayla demarco
476 south laurel avenue
Hazlet Township, NJ 07730
makayladmarco13@gmail.com

From: richard benser (bleepyourself1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
richard benser
319 palisade ave
Cliffside Park, NJ 07010
bleepyourself1@gmail.com

From: evelyn ambrose (etambrose@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
evelyn ambrose
200 old hook road
Harrington Park, NJ 07640
etambrose@gmail.com

From: robbin ryan (ryan986@ptd.net)

To: David Fish (David.Fish@dol.nj.gov)

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robbin ryan
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ryan986@ptd.net

From: julie sferrazza (jsferrazza@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
julie sferrazza
18 phipps ct
Flemington, NJ 08822
jsferrazza@comcast.net

From: eugene dellitalia (genebar2@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
eugene dellitalia
18 spotswood ave
Monroe Township, NJ 08831
genebar2@aol.com

From: jacqueline gillick (jacquelinenj814@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
jacqueline gillick
41 slape ave
Salem, NJ 08079
jacquelinenj814@aol.com

From: daphney job (daphey.job@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
daphney job
107 regina ave
Stanhope, NJ 07874
daphey.job@gmail.com

From: jorge mejia (jorgemejiat@hotmail.com)

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Yours sincerely,
jorge mejia
375 chestnut ave
South Hackensack, NJ 07606
jorgemejiat@hotmail.com

From: edgar muniz (edgarm310@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
edgar muniz
269 desoto place
Fairview, NJ 07022
edgarm310@aol.com

From: maria basile (mbasile34@verizon.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
maria basile
117 e atlantic ave 509
Haddon Heights, NJ 08035
mbasile34@verizon.net

From: anne colucci (acolucci2122@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
anne colucci
7 st maryÃ¢â‚¬â„¢s drive
Succasunna, NJ 07876
acolucci2122@gmail.com

From: raymond corbett (raymondcorbett077@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
raymond corbett
37nmaple ave
Marlton, NJ 08053
raymondcorbett077@gmail.com

From: john reedy (retblue1969@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
john reedy
327 nightingale square
Mays Landing, NJ 08330
retblue1969@yahoo.com

From: kimberly hanna (kimbelyhanna@gmail.com)

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Yours sincerely,
kimberly hanna
1104 iger way
Bayville, NJ 08721
kimbelyhanna@gmail.com

From: janice geiler (janyankees52@aol.com)

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Yours sincerely,
janice geiler
6 kevan pl
Middletown, NJ 07748
janyankees52@aol.com

From: julia delossantos (jdelossantos01@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
julia delossantos
179 front street
South Plainfield, NJ 07080
jdelossantos01@comcast.net

From: shirley walker (reklaw057@yahoo.com)

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shirley walker
526 jackson avenue
Glassboro, NJ 08028
reklaw057@yahoo.com

From: ana m soto (19soto.ana55@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
ana m soto
276 orange st 2 floor
Newark, NJ 07103
19soto.ana55@gmail.com

From: dale rizzo (drmint1030@aol.com)

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Yours sincerely,
dale rizzo
39 independence dr
Monroe Township, NJ 08831
drmint1030@aol.com

From: catherine oreilly (locust_garden@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
catherine oreilly
152 s manor ct
Wall Township, NJ 07719
locust_garden@yahoo.com

From: maureen beards (mbeards@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
maureen beards
124 radtke road
Randolph, NJ 07869
mbeards@gmail.com

From: alfie hicks (hicksalfie@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
alfie hicks
310 rhode island avenue
East Orange, NJ 07018
hicksalfie@icloud.com

From: ralph groff (cocopuffs6@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
ralph groff
1104 market st.
Bellmawr, NJ 08031
cocopuffs6@comcast.net

From: robert keenan (rkeenanjr@optonline.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
robert keenan
16 chelsea road
Old Bridge, NJ 08857
rkeenanjr@optonline.net

From: modnish shah (modshah2502@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
modnish shah
220 littleton road
Parsippany, NJ 07054
modshah2502@gmail.com

From: sherine robinson (fineja2003@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sherine robinson
14 vermeer drive
South Amboy, NJ 08879
fineja2003@gmail.com

From: berta i salazar mazariegos (bertas1672@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
berta i salazar mazariegos
4212wyndhurst dr
Plainsboro, NJ 08536
bertas1672@gmail.com

From: edward mcnamara (edmac94@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
edward mcnamara
4594 tuckahoe rd
Franklinville, NJ 08322
edmac94@gmail.com

From: arlene maxwell (arlenemaxwell5@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
arlene maxwell
55plumtree lane
Willingboro, NJ 08046
arlenemaxwell5@yahoo.com

From: jennifer troese (jennifer.troese@dcf.state.nj.us)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
jennifer troese
16 campbell dr
Eatontown, NJ 07724
jennifer.troese@dcf.state.nj.us

From: georgette eble (eblegeorge51@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
georgette eble
442 shore rd
Somers Point, NJ 08244
eblegeorge51@gmail.com

From: shawonda swain (sswain37@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
shawonda swain
32 laidlaw ave
Jersey City, NJ 07306
sswain37@yahoo.com

From: kate daisey (daiseystar8@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
kate daisey
17 swathmore ave
Gloucester City, NJ 08030
daiseystar8@gmail.com

From: ostha harley (osthaharley@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
ostha harley
197 central pl
Orange, NJ 07050
osthaharley@gmail.com

From: prahome melvin (prahomemelvin3@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
prahome melvin
471washington street
Newark, NJ 07102
prahomemelvin3@gmail.com

From: malik cheatham (malikcheatham0524@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
malik cheatham
303elm st
Perth Amboy, NJ 08861
malikcheatham0524@gmail.com

From: monica hopewell (dymondgirl711@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
monica hopewell
243 n. dr.mlk boulevard
Atlantic City, NJ 08401
dymondgirl711@gmail.com

From: jeremy lopez (jeremylo0926@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
jeremy lopez
132 chester avenue
Newark, NJ 07104
jeremylo0926@gmail.com

From: mildred colon (mildred.colon62@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
mildred colon
3716 park ave
Weehawken, NJ 07086
mildred.colon62@yahoo.com

From: fredrica barnes (fredrica_barnes@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
fredrica barnes
619 court street
Elizabethport, NJ 07206
fredrica_barnes@yahoo.com

From: james monroe (jmonroe30@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
james monroe
319 shilling dr
Somerset, NJ 08873
jmonroe30@gmail.com

From: michelle mowrey (michelle53102@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
michelle mowrey
779 south blvd
Phillipsburg, NJ 08865
michelle53102@yahoo.com

From: annette akins (yvonne9177@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
annette akins
60 dwight st
Jersey City, NJ 07305
yvonne9177@gmail.com

From: window lebron (windowlebron54@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
window lebron
300 marshall drive apt5a
Hoboken, NJ 07030
windowlebron54@gmail.com

From: melissa morales (lilyofthevalley1981@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
melissa morales
143 hamilton blvd
South Plainfield, NJ 07080
lilyofthevalley1981@gmail.com

From: thomas watts (tgwatts128@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
thomas watts
180 norwood ave
Long Branch, NJ 07740
tgwatts128@gmail.com

From: annie hill (hill46155@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
annie hill
217 south pine street
Bridgeton, NJ 08302
hill46155@gmail.com

From: andreia simoes (dreia621@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
andreia simoes
896 galloping hill road
Union, NJ 07083
dreia621@gmail.com

From: tisha burgess (tishawilson28@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tisha burgess
147 cleveland street
Orange, NJ 07050
tishawilson28@yahoo.com

From: murray porigow (mporigow801@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
murray porigow
1301 laurel oak rd
Voorhees, NJ 08043
mporigow801@comcast.net

From: leo guyette (leo_guyette@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
leo guyette
41 hartford road
Whiting, NJ 08759
leo_guyette@yahoo.com

From: oksana steranka (oksana464@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
oksana steranka
17 tilden drive,east hanover nj
East Hanover, NJ 07936
oksana464@yahoo.com

From: evelyn mcmillian (emcmillian162@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
evelyn mcmillian
162 wilkinson ave
Jersey City, NJ 07305
emcmillian162@yahoo.com

From: shawn preis (shawnpreisdeerhunter69@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
shawn preis
66 danville mountain rd
Great Meadows, NJ 07838
shawnpreisdeerhunter69@gmail.com

From: lauralee lucey (lauraleelucey17@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
lauralee lucey
127 newbury rd
Howell, NJ 07731
lauraleelucey17@gmail.com

From: Kam Amirzafari
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 1:40:07 PM

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Kam Amirzafari
922 Commons Way
Princeton, NJ 08540
kam@macleanwm.com

From: Kathi Diorio
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Friday, June 27, 2025 1:50:09 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

Like other advisors, I must be associated with a broker-dealer to meet federal and state requirements — but this is a legal compliance measure, not an employment relationship. The broker-dealer actually provides me with services that help me meet my clients' needs — similar to how any business might use software, IT, or legal support. I control how I run my business, who I work with, and how I serve my clients.

Mischaracterizing this relationship as employment not only threatens my livelihood but could lead to fewer financial advisors operating in New Jersey — a blow to the local economy and to residents who rely on our expertise. If advisors are pushed out or driven to other states, clients here will suffer.

I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Kathi Diorio
38 Cedar Pl
Wayne, NJ 07470
kdiorio@ifpguidance.com

From: Anthony Panto
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, June 27, 2025 2:00:12 PM

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Anthony Panto
108 Braddock Ln
Woodbury, NJ 08096
apanto@lincolninvestment.com

From:	Howard Fienberg
To:	Fish, David [DOL]
Subject:	[EXTERNAL] re: Proposed New Rules: N.J.A.C. 12:11 ABC Test; Independent Contractors
Date:	Friday, June 27, 2025 2:35:31 PM
Attachments:	image001.png IA-comments-NJ-Labor-ICstatusregs-6-27-25 final.pdf

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This Message Is From an Untrusted Sender
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Report Suspicious

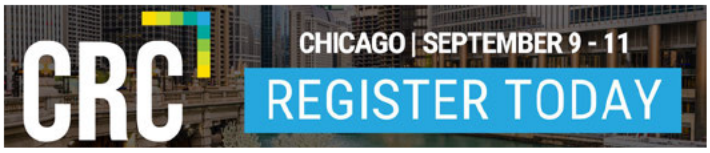
Executive Director Fish, attached are the comments of the Insights Association, representing the market research and analytics industry, with our concerns of how the proposed ABC test will impact research subjects receiving incentives for participation in research studies.

Our comments are also available online:
https://www.insightsassociation.org/Portals/INSIGHTS/xBlog/uploads/2025/6/27/IA-comments-NJ-Labor-ICstatusregs-6-27-25final_1.pdf

Sincerely,
Howard Fienberg

……..

Howard Fienberg
Senior VP Advocacy
Insights Association
Howard.fienberg@insightsassociation.org
O (202) 570-7312
1629 K Street NW, Suite 300
Washington, DC 20006
https://insightsassociation.org/



June 27, 2025

David Fish
Executive Director, Legal and Regulatory Services
New Jersey Department of Labor and Workforce Development

RE: Proposed rules N.J.A.C. 12:11 on independent contractor status[1]

Summary

The Insights Association (IA), representing the market research and analytics industry, submits comments regarding New Jersey's proposed regulations (N.J.A.C. 12:11) on independent contractor classification. The proposed ABC status test could unintentionally classify research subjects who receive occasional incentives for participating in market research as employees. Market research participation is inherently voluntary, sporadic, and motivated primarily by the opportunity to provide opinions and influence products, services or policies, rather than serving as consistent or meaningful employment. Our industry mitigates against treating research participation as a job, particularly as regular or "professional" respondents can compromise data integrity.

IA's comments highlight challenges with each prong of the ABC test, such as:

- Prong A's emphasis on "control" may inadvertently encompass routine requirements such as the use of specific software platforms or compliance.
- Prong B, requiring services to occur outside the company's usual course of business or physical locations, could harm in-person research such as focus groups or taste tests.
- Prong C mandates research subjects be engaged in an independently-established trade or business, a standard incompatible with the casual, intermittent nature of research participation, which is more akin to a hobby.

Given these significant concerns, the Insights Association recommends explicit regulatory clarification that individuals participating in market research and receiving incentives should be classified unequivocally as independent contractors. Drawing upon California's experience—where similar regulatory ambiguity was successfully addressed through clear legislative exemptions—IA emphasizes the critical need for clarity. Such action by New Jersey would protect the integrity and effectiveness of research, ensuring our industry continues to deliver reliable insights that inform decisions across numerous sectors, benefiting both consumers and businesses alike.

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1 https://www.nj.gov/labor/assets/PDFs/Legal%20Notices/Notices%20of%20Proposal/NJAC_12_11_(independent_contractor)_notice_of_proposal_FILED_4_3_25.pdf

Background

Rules proposed by the New Jersey Department of Labor and Workforce Development would codify the Department's approach to the ABC status test in current New Jersey labor law (N.J.S.A.43:21-19(i)(6) (A) to (C)[2]) regarding "the question of whether a particular worker is considered an employee or an independent contractor."

The Insights Association, the leading nonprofit association for the market research and analytics industry, files these comments in response because the proposed rules could have the unintended consequence of bringing research subjects within the definition of "employee" when they receive incentives for participation in market research studies.

The Insights Association's more than 9,400 members are the world's leading producers of intelligence, analytics and insights defining the needs, attitudes and behaviors of consumers, organizations and their employees, students and citizens. With that essential understanding, leaders can make intelligent decisions and deploy strategies and tactics to build trust, inspire innovation, realize the full potential of individuals and teams, and successfully create and promote products, services and ideas. We are a more than $77 billion industry[3] working with some of the biggest and brightest companies and organizations in the world.

Research Subjects and Market Research Incentives

Incentives are offered in various forms to some (but not all) research subjects to encourage their participation in insights studies, depending on the needs of those studies and the sample of research subjects we are trying to reach. This has been the case since the inception of market research[4] many decades ago. The form and amount of incentive for research subjects depends on a variety of factors, including: the length, mode, method and circumstances of the study; and the specialized knowledge, experience, demographics, or background of the participant mix.[5]

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[2] "Services performed by an individual for remuneration shall be deemed to be employment subject to this chapter (R.S.43:21-1 et seq.) unless and until it is shown to the satisfaction of the division that": (A) "Such individual has been and will continue to be free from control or direction over the performance of such service, both under his contract of service and in fact"; (B) "Such service is either outside the usual course of the business for which such service is performed, or that such service is performed outside of all the places of business of the enterprise for which such service is performed" (C) "Such individual is customarily engaged in an independently established trade, occupation, profession or business."

[3] Insights Association Annual U.S. Insights & Analytics Industry Report for 2024 https://www.insightsassociation.org/Resources/Reports-Library/Insights-Analytics-Market-Report

[4] Market research is defined as "the collection, use, maintenance, or transfer of personal information as reasonably necessary to investigate the market for or marketing of products, services, or ideas, where the information is not: (i) integrated into any product or service; (ii) otherwise used to contact any particular individual or device; or (iii) used to advertise or market to any particular individual or device." This is the basic definition adapted for federal privacy legislation in the U.S. House Energy & Commerce Committee in 2022 and 2024.

[5] The monetary value of the incentive or the form it may take is not determined on an ad hoc or haphazard basis, but is instead subject to rigorous fair market value analyses (sometimes by both the end client and by the research company or organization performing the study). The value and form, and whether an incentive is required at all, are generally

Being a research subject is not meant or represented to be a dependable source of income to support an individual or family. Incentive recipients do not constitute a "workforce." This is not "work" in any traditional sense. Research subjects are, at best, pursuing a hobby, one enjoyed only once in a while, with compensation not necessarily even offered. A research subject is not under the control of the researcher in any way remotely resembling a principal-worker relationship (where the principal gives instruction as to what the worker is to do and has recourse if that task is not completed or is not completed well); to the contrary, the research subject is free to complete the task (i.e., provide an answer or opinion) in any way desired, or even not at all; participation is completely voluntary, and subjects may opt out at any time.

Research subjects may participate in multiple studies for a myriad of companies in the same year, or even at nearly the same time, but that participation is not a profession, participants do not carry business cards titling themselves as professional market research participants, and participants cannot plausibly make a living at it. In fact, the insights industry goes to great lengths to prevent individuals from participating in too many research studies (especially with one company in a short period of time). Referred to as "cheater-repeaters" or "professional respondents" in industry lingo, such participants rush through studies in hopes of quick completion and receipt of an incentive. Instead of representative data, individuals that attempt to make a living this way produce skewed data; they derail the insights process and are often disqualified from taking additional surveys for that very reason. Cheater-repeaters / professional respondents also threaten the integrity of insights because they frequently try to get onto panels using fake IDs and data, and similarly provide erroneous responses to questions. Fortunately, our industry has developed a myriad of quality control measures (including algorithmic tools) that screen and detect for such conduct, thereby maintaining industry standards.

In any case, unlike an ordinary/traditional "worker," a research subject is not solely or even primarily motivated by monetary incentives. A bigger driver for market research participation is the opportunity for research subjects to provide their opinions or attitudes on who they are going to vote for in an election (and why), the desired course of a public policy, their feelings about a corporate brand, the need for new medicines, the design of a new smartphone, or changes to their favorite breakfast cereal. Through their participation, they get to influence or impact the future course of products, services and ideas. The foregoing motivations clearly do not describe a traditional (or even non-traditional) worker.

Nevertheless, laws and regulations still apply or -- to take the cynical view -- can be argued to apply, and when research subjects receive incentives for being research subjects they are considered or argued by some to fall within the scope of work laws. Due to this, the industry has historically taken the position that if work laws apply at all in this context, then research subjects are independent contractors.

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determined separately for each specific study. Some studies offer only an entry in a contest/sweepstakes as the incentive; some offer just the product/service being evaluated. A survey in a mobile game might offer an in-game benefit. Others provide the research subjects with flexible choices in what kind of incentive they prefer, including different ways to spend "points" received from a given study, or the ability to donate the value of the incentive to charity (sometimes a specific charity of the participants' own choosing).

The proposed prongs A, B, and C

Independent contractor status tests remain focused on traditional notions and understandings of work. The concern for the market research and analytics industry is that individuals' participation in market research may be inadvertently swept up in a regulatory framework that was never designed or intended to cover such conduct.

Prong A

Prong A, a business' control or direction over an individual's work, is a complicated one to interpret in the context of a research subject.

On the plus side, some of the Prong A factors in 12:11-1.3(c)[6] appear to weigh in favor of treating research subjects as independent contractors, since they generally:

- are not "on call" and can control their own hours, especially when participating in a study via an online panel, and even focus groups and 1-to-1 interviews can often be flexibly scheduled to the needs of the research subject;
- are not required to "wear a uniform or to don or display a specific logo, color(s), or other insignia";
- do receive "training" from the researcher, unless training is the subject of the research study;
- should not face "any risk of loss for services performed," other than loss of time and attention. In the insights industry, the capital investment/expenditure on the part of a research subject is negligible at best and not at all specific to their participation (e.g., a computer or mobile device with some form of Internet service to respond to an online survey). Companies that demand investment from consumers in order to connect them with survey opportunities are almost uniformly scam artists; and
- participate in studies for multiple companies/organizations, depending on their interests and availability, and cannot be tied to any exclusivity or limitations on their "geographic area or potential clientele." At worst, a company or organization may seek to avoid anyone who has participated in a study on certain topics, or for any other company/organization, or even their own, in a given time period, in order to try to avoid cheater-repeaters.

However, some Prong A factors are potentially more ambiguous for research subjects participating in market research who receive incentives. For example:

- Research subjects are generally not required "to use specific tools, supplies, or materials," but user/consumer testing of a physical good or product requires said good or product to be provided to the research subject by the researcher, and some online interviews and focus groups may specifically require the use of certain platforms, such as Zoom or Teams;
- Research subjects may be required "to use a digital application or software in the course of performing the services that is primarily or unilaterally controlled by the" researcher, if that includes, for example, the research subject's participation in a market research online community or interview platform run by the research company, or carrying a research company's technology used to help measure the research subject's media consumption habits during a certain timeframe; and

[6] Pages 22-23 of the proposed rules

- Research subjects are always expected to "render" their opinions, feedback, behavior, etc. "personally."

We appreciate the flexibility in the Department providing many potential factors in 12:11-1.3(c), but that also means that, absent clear guidance, the Department's interpretation could only be discerned on a case-by-case basis that would prove costly for most companies and organizations.

Prong B

Prong B of the test requires a company or organization to "establish either that an individual's services are outside of the putative employer's usual course of business or that such services are performed outside of all of the putative employer's places of business." Depending on interpretation, this could either be helpful to properly classifying research subjects or hurtful.

The participation by a research subject is "outside" of a market research company or organization's "usual course of business," in the sense that the research subject is not providing any specific service or work to the market research company or organization.

A majority of research subjects will perform services "outside of all of the putative employer's places of business," since most research is conducted at a distance (particularly online) or out-and-about (like interviews of passersby at a mall or in a city center, referred to as "intercepts" in industry lingo). However, research subjects participating in a focus group, a centralized/organized taste, product or service test, or other kinds of in-person interviews, may be required to visit such "places of business" as the company or organization's focus group facility, test kitchen, interviewing space, etc. This particular factor could submarine the ability to conduct such research studies.

Prong C

Prong C of the ABC test requires an independent contractor to be "customarily engaged in an independently established trade, occupation, profession, or business."

This is the prong that poses the most intractable problem for research subjects, particularly as laid out in 12:11-1.5(b).[7]

If anything, being a research subject is more like a hobby, and is definitely not a "trade, occupation, profession, or business." Individuals who try to treat it as such are treated as cheater-repeaters to be drummed out of research studies and do not last long in bona fide research. No research subject worth including in a research study will carry business cards or hold out shingles advertising themselves as a professional research subject.

[7] "1. The duration, strength, and viability of the individual's business (independent of the putative employer), 2. The number of customers of the individual's business and the volume of business from each respective customer, 3. The amount of remuneration the individual receives from the putative employer compared to the amount of remuneration the individual receives from others in the same industry, 4. The number of employees of the individual's business, 5. The extent of the individual's investment in their own tools, equipment, vehicles, buildings, infrastructure, and other resources, 6. Whether the individual sets their own rate of pay; and 7. Whether the individual advertises, maintains a visible business location, and is available to work in the relevant market." Pages 29-30 of the proposed rules

A research subject would need to participate in a lot of studies, with a lot of different companies or organizations, in a balanced fashion (not favoring participation too much with one researcher over another) in order to satisfy the factors in 12:11-1.5(b)1, 2 and 3. It could be an exceedingly tall order.

Further, 12:11-1.5(d) clarifies that "what is relevant is not whether an individual was free to work for others, but rather, whether the individual did perform services for, and receive remuneration for the performance of such services from, others during the relevant period." A research subject that only participates in a single study during a given time period, or a handful all for the same company or organization, would fail those factors.

Of course, another problem with those factors is that they would require a research company/organization to know the research participation habits of a research subject outside of that company or organization's own studies, something that a research subject may not wish to divulge and that companies and organizations do not necessarily ask. For remuneration in particular, knowing how much a research subject made in incentives from a study conducted by another company or organization could pose an antitrust risk and no researcher would ask such a question.

Finally, a research subject by nature will just flunk the factors in 12:11-1.5(b)4, 5, 6, and 7.

Recommendations to improve the proposed rules

While it might appear viscerally obvious that research subjects are not employees of companies or organizations conducting market research studies, the firms and organizations that contract with these individuals face troubling challenges to that nonemployee status. Those challenges could worsen dramatically with the Department of Labor and Workforce Development's proposed N.J.A.C. 12:11 rules. This would threaten the integrity of the research process and the resulting insights that people, companies, organizations and the governments rely upon every day to be able to learn about and understand consumer attitude, behavior and opinion in New Jersey and to make informed and intelligent decisions.

Unless New Jersey would consider adopting a common law test, the Insights Association strongly urges the Department to specifically clarify in the rules that research subjects receiving incentives for participation in market research are independent contractors when serving in that capacity.

California faced similar problems when it enshrined an ABC test in state law in 2019. The legislature first tried to carve out research subjects in a 2020 rewrite, but drafting errors made the situation worse. With specific and targeted input from the Insights Association, the legislature clarified in A.B. 1561 in 2021 that research subjects are independent contractors.[8]

[8] "2782. (a) Section 2775 and the holding in Dynamex do not apply to the relationship between a data aggregator and a research subject, and instead the holding in Borello shall apply, if all of the following conditions are satisfied: (1) The research subject is free from control and direction with respect to the substance and content of the feedback. (2) The nature of the feedback requested requires the research subject to exercise independent judgment and discretion. (3) The research subject has the ability to reject feedback requests, without being penalized in any form by the data aggregator.
(b) As used in this section:

Since California's statutory language is a bit clunky, we recommend sticking with the working definition of market research we referenced earlier: "*the collection, use, maintenance, or transfer of personal information as reasonably necessary to investigate the market for or marketing of products, services, or ideas, where the information is not: (i) integrated into any product or service; (ii) otherwise used to contact any particular individual or device; or (iii) used to advertise or market to any particular individual or device.*"

The insights industry requires certainty in the independent contractor status of research subjects who receive incentives. We reiterate that New Jersey's law, like most laws and regulations focused on employment status, did not develop with research in mind, nor is it particularly well suited to evaluating research subjects, which do not constitute a profession. The Department has an important opportunity to resolve these troubling ambiguities and confusion in the best interest of consumers and businesses.

We look forward to working with you in pursuit of these goals.

Sincerely,

Howard Fienberg
Senior VP Advocacy
Insights Association

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(1) "Data aggregator" is a business, research institution, or organization that requests and gathers feedback on user interface, products, services, people, concepts, ideas, offerings, or experiences from research subjects illing to provide it.
(2) "Research subject" is any person who willingly engages with a data aggregator in order to provide individualized feedback on user interface, products, services, people, concepts, ideas, offerings, or experiences, and does not engage solely for the purposes of completing individual tasks, except as the tasks relate to providing such feedback."
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB1561

From: Christopher Venuto
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Monday, June 30, 2025 1:00:10 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Christopher Venuto
9 Hampton Hollow Dr
Millstone Township, NJ 08535
chris.venuto@lpl.com

From: Corey Lunney
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 9:34:27 AM

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Report Suspicious

Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

There are more than 150,000 independent financial advisors who have long been an integral part of the securities industry across the country. Independent broker-dealers and their affiliated independent financial advisors provide clients in their communities with personalized and comprehensive financial advice. We help our clients invest, save for retirement, pay for their children's education, and buy insurance to cover unexpected expenses.

Ameriprise offers me the option of being an employee or an independent contractor. Being an independent advisor is my choice and allows me the flexibility to determine how I manage my practice, which includes determining the level of staffing support to provide a high-quality client experience, our technology set, and real estate footprint. As an independent advisor, I set my own schedule, select my clients, and assume typical responsibilities of a small business owner including staff, technology and other costs.

Many financial advisors prefer the flexibility to operate within an independent channel to help serve clients well and help them plan for their future. Please help my clients and my small business continue to thrive in New Jersey by specifically excluding financial advisors and broker dealers from compliance with the ABC Test. This will allow me to continue operating as an independent contractor in New Jersey and serve my clients well now and into the future.

Sincerely,

Corey Lunney
191 9th Street, Belford, nj
Belford, NJ 07718-1439

corey.lunney@ampf.com
732-747-1673

From: Michael Handzo
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 9:35:46 AM

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Report Suspicious

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Sincerely,

Michael Handzo
12 Black Oak Lane
Kinnelon, NJ 07405-2180

mhandzo@ampf.com
973-832-1637

From: Gavin Bobo
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 9:47:26 AM

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Sincerely,

Gavin Bobo
5 Greentree Centre 525 Rout 73 North, Suite 215 Marlton, NJ
Marlton, NJ 08053-3432

gavin.bobo@ampf.com
856-684-4151

From: James Meis
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 9:56:23 AM

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Report Suspicious

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Sincerely,

James Meis
51 Broadway
Somers Point, NJ 08244-1109

james.meis@ampf.com
609-425-2929

From: Rocco Manochio
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 10:08:48 AM

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Sincerely,

Rocco Manochio
1064 S Main St, Suite 1A
West Creek, NJ 08092-2913

rocco.manochio@ampf.com
609-318-8000

From: Henry Liao
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 10:21:25 AM

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I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

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Sincerely,

Henry Liao
4 century drive; Ste 120
Parsippany, NJ 07054-4606

henry.c.liao@ampf.com
973-265-1185

From: Anthony Pio Costa
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 10:35:16 AM

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Sincerely,

Anthony Pio Costa
350 Passaic Ave
Fairfield, NJ 07004-2025

anthony.piocosta@ampf.com
973-276-3290

From: Ian Gallagher
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 11:07:14 AM

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Sincerely,

Ian Gallagher
Five Greentree Centre, Suite 200
Marlton, NJ 08053-3422

ian.p.gallagher@ampf.com
856-797-0200

From: Morgan Burklow
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 11:07:17 AM

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Sincerely,

Morgan Burklow
4 Century Drive Suite 120
Parsippany, NJ 07054-4606

morgan.t.burklow@ampf.com
973-265-1185

From:	Karen Olanrewaju
To:	Fish, David [DOL]
Cc:	Karen Olanrewaju
Subject:	[EXTERNAL] Public Comment
Date:	Tuesday, July 1, 2025 11:13:14 AM
Attachments:	Public Comment DOL Regulations ABC Test 7.1.2025.docx.pdf
Importance:	High

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Dear Mr. Fish,

Please see the attached statement from our office regarding the recent proposed regulations redefining the ABC test used to determine whether an individual may be classified as an independent contractor.

Regards,
Karen

Karen Olanrewaju
Program Director
Sunny Days Early Childhood Developmental Services, Inc.
300 Corporate Center Dr.
Manalapan, NJ 07726
kolanrewaju@sunnydays.com
O: 732-761-0088
C: 732-598-8490
F: 732-255-2550

SUNNY DAYS
Making the future brighter, one child at a time since 1994

Sunny Days Early Childhood Developmental Services, Inc.

300 Corporate Center Drive

Manalapan, NJ 07726

7/1/2025

Public Comment Proposed ABC Regulations

On Monday, April 28, 2025, the New Jersey Department of Labor (NJDOL) published proposed regulations that would significantly redefine the ABC Test used to determine whether an individual may be classified as an independent contractor. These changes would make it nearly impossible for professionals in the field of Early Intervention to qualify as independent contractors—despite existing case law from the New Jersey Supreme Court.

Three specific provisions in the proposal are particularly alarming and would directly undermine the current NJ Early Intervention System (NJEIS) model:

- **Proposed N.J.A.C. 12:11-1.3(f) (Prong A)**: This proposal would prohibit consideration of requirements that stem from state or federal laws and regulations (such as background checks or HIPAA compliance) as part of evaluating the employment relationship. Ironically, our compliance with legal obligations would be used as *evidence* of an employer-employee relationship.
- **Proposed N.J.A.C. 12:11-1.4 (Prong B)**: Under this provision, the homes of the families we serve would be considered *our* "places of business" simply because our consultants provide services there, and those services are essential to our operations. This interpretation would make it impossible to satisfy Prong B of the ABC Test, resulting in automatic reclassification of all consultants as employees and potentially triggering retroactive liability for unemployment taxes.
- **Proposed N.J.A.C. 12:11-1.5 (Prong C)**: This section states that professional licensure (e.g., SLPs, PTs, OTs, Professional Nurses) is not sufficient to establish independent contractor status. Instead, individuals must prove that they are actively and independently operating a business, complete with corporate formalities.
- This would disqualify the majority of our consultants, even those who independently contract with multiple agencies.

These regulations are contrary to established court rulings and, if adopted, would jeopardize the service delivery model that NJEIS has relied upon for decades. The implications are far-reaching and potentially catastrophic for the field.

I'd like to specifically address several points of greatest magnitude for providers and families.

- There is an average of close to 400 children/families waiting for services in the NJEIS on any given day. This "wait" is directly attributable to the fact that there is a shortage of licensed therapists and other qualified practitioners to deliver the services needed to address the developmental concerns and delays for these children. This wait list will only be lengthened if there are less providers.
- The field will lose many Occupational Therapists, Physical Therapists, Speech Language Pathologists who are already in private practice and will not agree to become employees for any registered agency or hospital program.
- Children and families will suffer from the loss of independent contractors as there will not be enough providers to replace these therapists as they stop servicing their active children/families or to pick up newly referred children/families are added to the county broadcast lists every day.
- Most traditional medical insurance carriers do not offer coverage benefits for ST/PT/OT for infant and toddlers in the absence of a serious medical condition or birth defect. "Developmental Delays" does not qualify a child for therapy benefits. Benefits are assigned to therapeutic recovery of medical conditions. This alternative for obtaining services needed is not an option for most families.
- These independent contractors are in private practice and typically consult with multiple agencies. The collective volume of work they provide throughout the system will be felt across the board and impact children and families in every county in the State of New Jersey.

Within the NJEIS (New Jersey Early Intervention System) most of the provider agencies that hold a Letter of Agreement (LOA) currently rely heavily on Independent Contractors to accept referrals for EI services for children/families needing critical support therapy services on a daily basis. Many of these independent contractors are already employed in local school districts or work in rehabilitation centers or hospitals. Still more of them have their own private therapy practices established throughout the state. Early Intervention, for a majority of them, is a second stream of income, and not their primary source of revenue. If, as we anticipate, many drop out of the industry to avoid becoming an employee of any EI agency, the NJEIS will lose a significant number of available therapists and, in turn, increase the volume of families waiting for needed services. The resulting exodus of practitioners of all disciplines will be catastrophic to the families, the NJ Early Intervention System and agencies like Sunny Days Early Childhood Developmental Services, Inc.

I am respectfully requesting that these regulatory provisions be voted down by the NJ Legislative body in order to maintain the integrity of the much-needed service delivery system for vulnerable babies and toddlers.

Respectfully submitted,

Karen Olanrewaju

Program Director

P: 732-761-0088

C: 732-598-8490

kolanrewaju@sunnydays.com

Vista Rehab Services, P.A.
serving persons with special needs

185 Green Street, Woodbridge, NJ 07095
Tel 732-634-5980 • Fax 732-634-9508
VistaRehabServices@gmail.com
VistaRehabServices.com

June 25, 2025

New Jersey Department of Labor and Workforce Development

David Fish, Executive Director Legal and Regulatory Services Department of Labor and Workforce

Development PO Box 110,

13th Floor Trenton, New Jersey 08625-0110

Fax: (609) 292-8246

Email: david.fish@dol.nj.gov

Re: Public Comment on Proposed N.J.A.C. 12:11-1.3, 1.4, and 1.5

Dear David Fish,

On behalf of Vista Rehab Services, we respectfully submit this public comment regarding the proposed amendments to N.J.A.C. 12:11-1.3, 1.4, and 1.5, which address the classification of independent contractors. We believe these changes conflict with the established guidelines and practices of the New Jersey Department of Health (DOH) for Early Intervention services and will negatively impact the families we serve and the skilled professionals we rely on.

At Vista Rehab Services, we are committed to bringing together a team of highly skilled and dedicated pediatric clinical specialists to empower young children and their families. Our mission is to provide high-quality, personalized early intervention services that support developmental growth and learning, utilizing a multidisciplinary team approach. By integrating evidence-based practices with collaborative care, we strive to enhance the skills, confidence, and potential of every child, laying a strong foundation for lifelong success.

Conflict with DOH Guidelines

The DOH's Early Intervention program guidelines explicitly allow and support the use of independent contractors, including licensed professionals such as speech-language pathologists, physical therapists, occupational therapists, and social workers. This arrangement is essential for ensuring families have access to specialized, timely care from a diverse team of experts.

The proposed amendments would significantly hinder Early Intervention programs' ability to continue providing vital services to families across New Jersey. The following changes illustrate the potential negative impacts.

- **Prong B (Proposed N.J.A.C. 12:11-1.4)** would consider the homes of families—where Early Intervention services are delivered—to be our "places of business," making it impossible to satisfy this part of the ABC Test.

- **Prong C (Proposed N.J.A.C. 12:11-1.5)** would require that these professionals operate as formal, incorporated businesses, even if they already work with multiple agencies as independent contractors.

- **Prong A (Proposed N.J.A.C. 12:11-1.3(f))** would inappropriately treat compliance with mandated requirements (such as background checks and HIPAA) as evidence of an employment relationship, despite these being legal obligations for the safety and well-being of children and families.

This misalignment between DOH and NJDOL standards places Early Intervention agencies in an untenable position, ultimately jeopardizing service continuity. The proposed changes threaten to disrupt the current service delivery model, forcing families to face the potential loss of essential support.

Impact on Families and Providers

If adopted, these rules would have devastating consequences for agencies like Vista Rehab Services and the families we serve:

- Families would ultimately lose access to essential Early Intervention services, undermining the entire purpose of these programs.

- Many dedicated professionals who prefer the flexibility and autonomy of independent contractor status would be forced to abandon this work, reducing the diversity and expertise available to families.

- We could face retroactive liability for unemployment insurance and employment taxes, jeopardizing our financial sustainability.

Proposed Solutions

To avoid these harmful consequences, we urge the NJDOL to:

1. **Provide a safe harbor** for Early Intervention agencies that comply with DOH guidelines when engaging independent contractors.

2. **Clarify that family homes are not considered "places of business"** under Prong B, recognizing the unique nature of in-home Early Intervention care.

3. **Accept professional licensure and multiple agency work** as sufficient to satisfy Prong C for these essential service providers.

4. **Avoid penalizing agencies** for complying with state and federal mandates designed to protect children and families.

Conclusion

At Vista Rehab Services, our mission is to meet the unique needs of each family we serve by leveraging the talents and dedication of independent pediatric specialists. The proposed changes would compromise our ability to deliver this care and conflict with the established practices of the Department of Health. We urge you to reconsider these amendments and ensure that Early Intervention agencies can continue to provide high-quality, family-centered services while also supporting fair labor practices.

Thank you for your thoughtful consideration. We would be happy to provide additional information or participate in further dialogue to help find a workable solution.

Sincerely,

Dr. Francine A. Ruzich
State Liaison Officer
Vista Rehab Services

Kathy McEwen
CEO
Vista Rehab Services

From: Tiffani Tita
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 11:43:25 AM

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Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

There are more than 150,000 independent financial advisors who have long been an integral part of the securities industry across the country. Independent broker-dealers and their affiliated independent financial advisors provide clients in their communities with personalized and comprehensive financial advice. We help our clients invest, save for retirement, pay for their children's education, and buy insurance to cover unexpected expenses.

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Sincerely,

Tiffani Tita
16 leigh st clinton
Clinton, NJ 08809-1412

tiffani.l.tita@ampf.com
908-713-6600

From: JOHN dipietro
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 11:49:28 AM

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Sincerely,

JOHN dipietro
47 south Broadway
Pitman, NJ 08071-1413

john.dipietro@ampf.com
856-218-7030

From: Joseph Mandile
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 12:03:15 PM

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Sincerely,

Joseph Mandile
141 West Front Street Red Bank NJ
Red Bank, NJ 07701-6418

Joseph.j.mandile@ampf.com
732-747-1673

From: PATTI SOLDAVINI
To: Fish, David [DOL]
Subject: [EXTERNAL] Opposition to ABC Test Rule/N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 1:54:16 PM

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Dear Mr. Fish.
This proposed ABC Test Rule/N.J.A.C. 12:11 regulation is very misguided and needs to be dismissed.
I spent an entire career in Marketing working for large companies in the entertainment, pharmaceutical and graphics industries. I was laid off from my most current role as Global Head, Strategy, SGK, in September 2022 with the rest of the Marketing Department. This came 18 months prior to my planned retirement.
Since then, I have been working as an Independent Contractor for several organizations, serving as a Marketing Consultant and Writer. The revenue I earn from these projects allows me to continue to reside in New Jersey where my single largest expense remains (no surprise here), my property taxes. This income supplements the money I earn from Social Security, which is not nearly enough for me to live on.
I am 68 years old. There are two things I know for sure. No company on earth wants to hire a 68-year old as a full-time employee and I have zero desire to work full-time as an “indentured servant” for any company under any circumstances and especially in a work world that has become increasingly hostile to all employees.
Working as an Independent Contractor gives me the freedom to set my own rates, my own schedule, and to accept or reject projects as I choose. This is the true definition of “independence” and “freedom.” The attempt to misclassify all independent contractors under this proposed regulation demonstrates either a gross lack of critical thinking or a gross lack of ethical conduct. Take your pick.
If I keep being taxed to death in this state (and don’t even get me started on the inherent unfairness of how property taxes are calculated…In over 20 years, I have paid more than $100k into a local school system and I have zero children. This too, needs to change.), and am unable to earn a living as an Independent Consultant, I will have no choice but to move out of state.
Patti Soldavini

From: Charles Leonard
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 1:59:14 PM

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Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

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Many financial advisors prefer the flexibility to operate within an independent channel to help serve clients well and help them plan for their future. Please help my clients and my small business continue to thrive in New Jersey by specifically excluding financial advisors and broker dealers from compliance with the ABC Test. This will allow me to continue operating as an independent contractor in New Jersey and serve my clients well now and into the future.

Sincerely,

Charles Leonard
656 farragut ave haddonfield nj
Haddonfield, NJ 08033-3834

charles.leonard@ampf.com
508-878-3629

From: Brian Seigfried
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Tuesday, July 1, 2025 10:10:23 PM

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Sincerely,

Brian Seigfried
100 Federal City Road Suite C102
Lawrence Township, NJ 08648-1664

brian.seigfried@ampf.com
609-771-8017

From: Michelle Heide
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Wednesday, July 2, 2025 6:42:44 AM

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Dear David Fish,

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Sincerely,

Michelle Heide
72 Welisewitz Road
Ringoes, NJ 08551-1711

Michelle.L.Heide@ampf.com
908-713-6600

From: Matt Godfroy
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Wednesday, July 2, 2025 7:12:39 AM

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Sincerely,

Matt Godfroy
100 federal city rd c102
Lawrence Township, NJ 08648-1664

matthew.x.godfroy@ampf.com
609-771-8018

From: John Turi
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Wednesday, July 2, 2025 8:40:19 AM

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Dear David Fish,

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Sincerely,

John Turi
75 Bataan Ave, Tinton Falls
Eatontown, NJ 07724-3215

john.turi@ampf.com
908-907-8644

From: Rebekah Fischoff
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Wednesday, July 2, 2025 9:21:18 AM

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Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

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Sincerely,

Rebekah Fischoff
141 West Front Street, Red Bank, NJ
Red Bank, NJ 07701-6418

rebekah.fischoff@ampf.com
732-747-1673

From: John Brewster
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Wednesday, July 2, 2025 12:20:22 PM

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Sincerely,

John Brewster
250 Pehle
Mahwah, NJ 07430

john.g.brewster@ampf.com
201-221-2748

From: DARRIN BRADLEY
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Wednesday, July 2, 2025 12:20:26 PM

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Sincerely,

DARRIN BRADLEY
2640 Hwy 70
Manasquan, NJ 08736-2609

darrin.bradley@ampf.com
215-880-2302

From: Joseph Zaccardo
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Wednesday, July 2, 2025 2:54:40 PM

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I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

There are more than 150,000 independent financial advisors who have long been an integral part of the securities industry across the country. Independent broker-dealers and their affiliated independent financial advisors provide clients in their communities with personalized and comprehensive financial advice. We help our clients invest, save for retirement, pay for their children's education, and buy insurance to cover unexpected expenses.

Ameriprise offers me the option of being an employee or an independent contractor. Being an independent advisor is my choice and allows me the flexibility to determine how I manage my practice, which includes determining the level of staffing support to provide a high-quality client experience, our technology set, and real estate footprint. As an independent advisor, I set my own schedule, select my clients, and assume typical responsibilities of a small business owner including staff, technology and other costs.

Many financial advisors prefer the flexibility to operate within an independent channel to help serve clients well and help them plan for their future. Please help my clients and my small business continue to thrive in New Jersey by specifically excluding financial advisors and broker dealers from compliance with the ABC Test. This will allow me to continue operating as an independent contractor in New Jersey and serve my clients well now and into the future.

Sincerely,

Joseph Zaccardo
273 State Route 34
Colts Neck, NJ 07722

joseph.d.zaccardo@ampf.com
732-366-9771

From: Christopher Noviello
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Wednesday, July 2, 2025 4:30:10 PM

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Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Christopher Noviello
55 Totten Dr
Bridgewater, NJ 08807
chris@noviellogroup.com

From:	rhollrah iecoalition.org
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Proposal Number: PRN 2025-051 -- ABC Test; Independent Contractors
Date:	Wednesday, July 2, 2025 5:10:52 PM
Attachments:	CPIE Ltr re New Jersey Proposed IC Regulations.pdf

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Mr. Fish:

Attached are comments concerning the proposed regulations interpreting the "ABC" test.

The Coalition appreciates the opportunity to participate in the rulemaking process.

Thank you very much.

Sincerely,

Russell A. Hollrah

Executive Director
Coalition to Promote Independent Entrepreneurs
1025 Connecticut Avenue, N.W.
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Coalition to Promote
Independent Entrepreneurs

ICCoalition.org · (202) 659-0878

July 2, 2025

BY EMAIL: david.fish@dol.nj.gov
Mr. David Fish
Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
PO Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Re: ABC Test; Independent Contractors
Proposed New Rules: N.J.A.C. 12:11
Proposal Number: PRN 2025-051

Dear Mr. Fish:

The Coalition to Promote Independent Entrepreneurs ("CPIE")[1] appreciates this opportunity to submit comments concerning the proposed regulations interpreting New Jersey's "ABC" test.

The proposed regulations' acknowledgment that a remote worker who performs services from the individual's personal residence can satisfy the "B" factor of the "ABC" test will add helpful clarity to the test.

CPIE respectfully requests that the final regulations provide more practice guidance on how a company can satisfy the "C" factor without having to rely on independent contractors disclosing proprietary information concerning their other clients.

The proposed regulations do not accurately reflect the judicial precedent that is referenced in support of certain factors, and they create a new presumption of employment for certain drivers that contradicts a published court decision. CPIE respectfully urges that the final regulations be revised to better reflect referenced court decisions and omit the proposed presumption of employment for drivers.

The "ABC" test provides that:

> [s]ervices performed by an individual for remuneration shall be deemed to be employment subject to this chapter (R.S.43:21-1 et

[1] www.iecoalition.org. The Coalition to Promote Independent Entrepreneurs was formed to inform the public and elected representatives about the importance of an individual's right to work as a self-employed individual, and to defend an individual's right to contract in this capacity.

> seq.) unless and until it is shown to the satisfaction of the division that:
>
> (A) Such individual has been and will continue to be free from control or direction over the performance of such service, both under his contract of service and in fact;
>
> (B) Such service is either outside the usual course of the business for which such service is performed, or that such service is performed outside of all the places of business of the enterprise for which such service is performed; and
>
> (C) Such individual is customarily engaged in an independently established trade, occupation, profession or business.

N.J.S.A. § 43:21-19(i)(6).

1. Proposed Regulations Offer Helpful Guidance in Response to Court Request

In the Preamble accompanying the proposed regulations (the "Preamble"), the Department of Labor and Workforce Development (the "Department") states that one aspect of the proposed regulations' interpretation of Prong "B" of the "ABC" test:

> is directly responsive to the New Jersey Supreme Court's suggestion that "the Department exercise its statutory authority and expertise, particularly in light of the prevalence of remote work today, to promulgate regulations clarifying where an enterprise 'conducts an integral part of its business' and what constitutes the 'usual course of the business.'"[2] (Emphasis added).

CPIE submits that the Department's guidance in response to this request adds clarity and is helpful. In this regard, the proposed regulations include in a list of examples of locations that are both outside of the putative employer's physical plant and outside the putative employer's places of business, because they are not locations where the putative employer conducts an integral part of its business:

> [a]n individual's personal residence where they perform remote work. For the purpose of this subparagraph, the term "remote work"

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[2] The Preamble states, at 57 N.J.R. 894 (May 5, 2025), that the New Jersey Supreme Court requested this guidance in *East Bay Drywall, LLC v. Dep't of Labor and Workforce Development*, 251 *N.J.* 477 (2022). In that decision, the Court asked the Department to:

> exercise its statutory authority and expertise, particularly in light of the prevalence of remote work today, to promulgate regulations clarifying where an enterprise "conducts an integral part of its business" and what constitutes the "usual course of the business."

251 *N.J.* 477, 496 n. 3.

> means performing services from a location other than a location operated by the putative employer.[3]

Thus, the proposed regulations make clear that an individual performing remote work from the individual's personal residence can satisfy the "B" factor.

2. Proposed Regulations Could Offer Practical Guidance for "C" Factor

An aspect of the "ABC" test that could benefit from Department guidance is the "C" factor. The proposed regulations state, in relevant part, that:

> [t]he following factors are among those that shall be considered when evaluating whether an individual is customarily engaged in an independently established trade, occupation, profession, or business, pursuant to Prong C of the ABC test:
>
> 1. The duration, strength, and viability of the individual's business (independent of the putative employer);
>
> 2. The number of customers of the individual's business and the volume of business from each respective customer;
>
> 3. The amount of remuneration the individual receives from the putative employer compared to the amount of remuneration the individual receives from others in the same industry.[4]

And the burden of proof to establish independent contractor status, pursuant to the "ABC" test, is on the putative employer.[5] It follows that a company seeking to satisfy the "C" factor relative to an individual needs to possess this information concerning the individual's business.

CPIE respectfully submits that the final regulations should permit a company to satisfy the "C" factor relative to an individual by relying on the individual's written representation to the company that (i) the individual operates an enterprise that exists and can continue to exist independently of and apart from the individual's service relationship with the company, (ii) the individual obtains and intends to continue obtaining service opportunities for its enterprise from sources other than the company, and (iii) the enterprise the individual operates is stable and lasting and will survive the termination of the individual's relationship with the company.[6]

To require an individual to disclose to a potential client the number of customers of the individual's business and the volume of business from each respective customer or the amount of

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[3] Prop. N.J.A.C. 12:11-1.4(g)4.ii.
[4] Prop. N.J.A.C. 12:11-1.5(b).
[5] Prop. N.J.A.C. 12:11-1.2(a).
[6] The proposed representations are based on the New Jersey Supreme Court decision in *Carpet Remnant Warehouse, Inc. v. New Jersey Department of Labor*, 125 *N.J.* 567, 585 (1991).

remuneration the individual receives from other clients in the same industry is unfair and highly discriminatory against individuals who choose to operate as independent contractors.[7] But the only way a potential client can protect itself against violating the "C" factor with respect to an individual is to require the individual to disclose this highly proprietary information. No other vendor is required to disclose such information to a potential client.

An independent contractor's disclosure of such information to a potential client significantly strengthens the client's bargaining position relative to the individual. This is because the disclosure reveals to the potential client how dear to the individual the client opportunity is. This would arm the potential client with information that would enable it to negotiate a lower fee with an individual who has less work with other clients than another individual who has more work with other clients. It follows that the Department's proposed regulations can diminish a legitimate independent contractor's negotiating leverage relative to a potential client when negotiating fees for client projects.

3. Proposed Regulations Create Confusion By Distorting Judicial Precedent

CPIE respectfully submits that the proposed regulations concerning other aspects of New Jersey's "ABC" test create more confusion than clarity and do not accurately reflect judicial precedent. In this regard, CPIE believes the extant court decisions offer companies clearer guidance for interpreting the "ABC" test than the proposed regulations. The proposed regulations – rather than providing companies with enhanced clarity and certainty – interject greater uncertainty into worker-status determinations under the "ABC" test.

For example, the proposed regulations interpreting the "A" factor include among the "sub-factors [that] may be considered when determining whether the putative employer has exercised control over the details and means by which the services are performed by the individual:"

> [w]hether the putative employer requires the individual to use a digital application or software in the course of performing the services that are primarily or unilaterally controlled by the putative employer.[8]

This sub-factor is very broad. It includes any company-controlled digital application or software that an individual is required to use in the course of performing the services. Thus, it would include a company-controlled website portal on which a company posts available projects that are available for acceptance by third-party vendors, at their sole discretion. And it would include a company-controlled internet portal through which a company asks third-party vendors to submit project deliverables. But it is not clear how the existence of such digital applications or software could be construed as evidence of the company's right of control over the details and

[7] CPIE is aware that the specific factors were established by the New Jersey Supreme Court in *Carpet Remnant Warehouse, Inc. v. New Jersey Department of Labor*, 125 *N.J.* 567, 592-93, but the regulations provide an opportunity for the Department to delineate a practical means by which a company can satisfy this factor – without disadvantaging the independent contractor in the process.

[8] Prop. N.J.A.C. 12:11-1.3(c)2.i(3).

means by which the services are performed. These technologies are commonly used by companies that contract with large numbers of independent vendors on a recurring basis to perform projects throughout the country or throughout the world.

By contrast, the court decision from which the sub-factor was extracted reveals a narrower scope for the sub-factor.[9] The court in *Pennsauken Diagnostics Ctr., LLC v. N.J. Dep't of Labor & Workforce Dev.*, 2024 *N.J. Super.* Unpub. LEXIS 1232 (App. Div. 2024), affirmed the Commissioner's determination that the following seven findings demonstrate that the company ("PDC") failed to satisfy the "A" factor:

> PDC's actions demonstrated indicia of direction or control over the radiologists, including: (1) the overall relationship that led to the radiologists' work and the key terms and conditions of the work were set by PDC; (2) PDC controlled the workflow; (3) after PDC performed the diagnostic imaging, the radiologists were required to log into PDC's portal to determine which diagnostic images to read; (4) PDC required the radiologists' reports be prepared within twenty-four hours; (5) PDC paid the radiologists directly for their services at a set rate pursuant to the agreement with PTR; (6) PDC—not PTR—billed patients and insurance companies for the radiologists' services; and (7) PDC bore the risk of loss for the services performed by the radiologists. (Emphasis added).

The specific finding in this decision that was incorporated into the proposed regulations, as referenced above, is "after PDC performed the diagnostic imaging, the radiologists were required to log into PDC's portal to determine which diagnostic images to read." Importantly this finding immediately follows a related finding by the court that "PDC controlled the workflow." Such findings, taken together, indicate that the court found that the company used its portal to control the assignment of specific diagnostic images to be read to specific vendors. But, for the reasons discussed above, this is quite different from the generic sub-factor the Department proposes.

Unlike the court decision from which the sub-factor was extracted, the proposed regulations' restatement of the sub-factor does not differentiate between a digital application or software through which a company seeks to exercise control, on the one hand, and a digital application or software that merely adds efficiencies to an administrative process -- without in any way affecting a vendor's discretion over the selection of projects to perform or over when, where, or how the vendor performs a selected project.

It follows that the proposed regulation provision would introduce new confusion and uncertainty for a company endeavoring to evaluate whether its adoption of a new technological efficiency for use in its interaction with vendors could jeopardize the vendors' independent-

[9] The Preamble, at 57 N.J.R. 894, 895, states that this factor was based on the decision in *Pennsauken Diagnostics Ctr., LLC v. N.J. Dep't of Labor & Workforce Dev.*, 2024 *N.J. Super.* Unpub. LEXIS 1232 (App. Div. 2024).

contractor status. The court's analysis in *Pennsauken Diagnostics* would offer the company much clearer guidance on this issue than would the proposed regulation provision.

4. Proposed Regulations Create Presumption of Employee Status In Conflict with Reported Court Decision

Another example of the confusion the proposed regulations would create is the proposed regulations' creation of a new presumption of employee status for drivers who obtain clients through a transportation network company ("TNC"). The proposed regulations accomplish this by their inclusion of two examples concerning the "B" factor. The first such example is an example of "services that will typically not be outside of the putative employer's usual course of business," namely:

> [a] transportation network company, as defined at N.J.S.A. 39:5H-2, engages the services of a driver to transport riders (customers) of the transportation network company from one location to another. The services performed by the driver are likely not outside of the transportation network company's usual course of business.[10]

The second such example is an example of "locations that are outside of the putative employer's physical plant, but remain among the putative employer's places of business, because they are locations where the putative employer conducts an integral part of its business:"

> [a] vehicle operated by a driver, whether for a limousine, taxi, transportation network company.[11]

These two examples, taken together, create a presumption that a TNC cannot satisfy the "B" factor with respect to a driver.[12] But the statute defines a TNC as:

> a corporation, partnership, sole proprietorship, or other entity that … uses a digital network to connect a transportation network company rider to a transportation network company driver to provide a prearranged ride.[13]

The proposed regulations' presumption that a TNC cannot satisfy the "B" factor appears to flatly contradict the court's analysis in *Trauma Nurses, Inc. v. Board of Review,* 576 A.2d 285 (N.J. Super. 1990). In that decision, the court found that Trauma Nurses, Inc. ("TNI") is in the business of supplying hospitals with nurses on a temporary basis. The court characterized TNI as

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[10] Prop. N.J.A.C. 12:11-1.4(d)1.
[11] Prop. N.J.A.C. 12:11-1.4(g)3.iii.
[12] Inasmuch as the "ABC" test is conjunctive, a failure to satisfy the "B" factor with respect to an individual results in the test not being satisfied relative to the individual.
[13] N.J.SA. 39:5H-2.

"an employment broker, matching nursing professionals with hospitals and other health care institutions seeking to supplement their staffs on a temporary, short-term basis."

With respect to the "B" factor, the court reasoned that a broker in the business of matching a nurse with the personnel needs of a hospital is not undertaking the provision of health care services and that "[t]he service of supplying health care personnel does not translate into the business of caring for patients. The simple and overriding fact is that TNI does not perform patient care. It brokers nurses."[14] The court went on to find that the nurses placed by TNI performed nursing services, a function clearly beyond the purview and usual course of TNI's business. The court also found that nurses performed no work in the TNI office but instead reported directly to hospitals. The court concluded that the "B" factor was satisfied. The court's analysis in *Trauma Nurses* has been applied by courts in other jurisdictions as well.[15]

The decision in *Trauma Nurses* suggests that an entity that "uses a digital network to connect a transportation network company rider to a transportation network company driver to provide a prearranged ride" could structure its relationship with drivers similar to how the business in *Trauma Nurses* structured its relationship with nurses – which would satisfy the "B" factor. Yet, the proposed regulations impede this opportunity by creating a new presumption that such a driver could not satisfy the "B" factor relative to a TNC.

5. Conclusion

In the Preamble, the Department explains that its interpretation of the "ABC" test relies heavily on decisions by the New Jersey Supreme Court, which should be known to attorneys and

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[14] *Trauma Nurses, Inc. v. Board of Review,* 576 A.2d 285, 291.

[15] For example, in *State Dept. of Employment, Training & Rehab., Employment Securities Div. v. Reliable Health Care Services of Southern Nevada, Inc.,* 983 P.2d. 414, 418 (Nev. 1999), the Supreme Court of Nevada analyzed a broker/referral service that referred respiratory technicians to clients (the same type of business model that FDM operates). The Nevada Supreme Court recognized that the two types of businesses engaged in by the broker and the respiratory technicians are entirely separate from each other. The Court explained that "it is clear that the Providers and Reliable work in two distinct businesses. The Providers are respiratory technicians who directly treat patients. In stark contrast, Reliable is a staffing company that profits from brokering workers; in brokering health care workers, Reliable does not treat patients." The Court concluded that "We are convinced that the business of brokering health care workers does not translate into the business of treating patients...." Accord, *Daw's Critical Care Registry, Inc. v. Department of Labor,* 422 Conn. 457, 622 A.2d 622 (1993), *affirmed* 225 Conn. 99 (1993), wherein the court provides the following analysis concerning a similar type of business:

> A "broker" has been said generally to be one whose business it is to bring buyer and seller together. A "broker" has also been said to be a "middleman or negotiator between parties." There can be little question but that Daws is in the business of providing, indeed brokering, nurses to its clients' medical facilities. There also can be little question but that the nurses so provided furnished their professional services at the particular medical facility. Once, however, they went on an assignment, Daws had no control over them, certainly as to how they performed their services. Daws was not in the business of *providing* health care at any client's medical facility. In other words the business of providing health care personnel does not translate into the business of caring for patients. As in *Trauma Nurses,* the "simple and overriding fact" is that Daws does not perform patient care but it brokers nurses. In so doing it is Daws' nurses who perform nursing services when at medical facilities, which is a function beyond the usual course of Daws' business and beyond what, in fact, it holds itself out to do.

accountants who practice in this area – but likely will not be known to employers who are making worker-classification decisions.[16] The Department expresses hope that by codifying its interpretation of the "ABC" test, including the factors used by the New Jersey Supreme Court, their predecessors and progeny, employers will be better informed and better able to make appropriate decisions regarding the classification of workers.[17]

For the reasons set forth above, though, CPIE respectfully submits that the proposed regulations in certain respects do not accurately reflect the extant judicial precedent and create more confusion and uncertainty for companies endeavoring to properly classify individuals in accordance with judicial decisions interpreting the "ABC" test.

Accordingly, CPIE respectfully urges that the Department revise its proposed regulations to better reflect the referenced court decisions and to include practical guidance for how a company can satisfy the "C" factor without requiring independent contractors to disclose proprietary information concerning their other client work, which can diminish their negotiating position.

Thank you very much for your consideration.

Respectfully submitted,

Russell A. Hollrah
Executive Director
rhollrah@iecoalition.org
(202) 659-0878

[16] 57 N.J.R. 894.
[17] Id.

From: media
To: Fish, David [DOL]
Subject: [EXTERNAL] Public Comment Submissions on PRN 2025-051 – ABC Test; Independent Contractors
Date: Thursday, July 3, 2025 11:29:51 AM
Attachments: Public Comments on PRN 2025-051 Batch 3.xlsx
Public Comments PRN 2025-051 Batch 3.pdf

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Hi Mr. Fish,

Attached here, please find an additional 467 public comments from concerned New Jerseyans related to PRN 2025-051 -- ABC Test for Independent Contractors. As in my previous emails, contact information for each commenter is included on each individual letter and in an attached spreadsheet. These letters were also sent to your email directly, but I am sending them here as well.

If you could confirm receipt of these comments, it would be much appreciated.

Thank you again and I hope you have a great holiday weekend!
Charlyce

SEND TO:	FIRST NAME	LAST NAME	EMAIL ADDRESS	SUBJECT
David.Fish@dol.nj.gov	mary beth	gifford	mbgif710@gmail.com	Public comment on
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David.Fish@dol.nj.gov	sheslia	downey	shealia461@gmail.com	Public comment on

BODY	PHONE	ADDRESS	CITY
such a rule. They have already played out in California under tl	###########	98 westover driv	Delran
such a rule. They have already played out in California under tl	###########	nville mounntair	Great Meadows
such a rule. They have already played out in California under tl	###########	15 saddle river	Fair Lawn
such a rule. They have already played out in California under tl	###########	490 park ave 4c	Paterson
such a rule. They have already played out in California under tl	###########	112 foam rd	Millville
such a rule. They have already played out in California under tl	###########	0 broadway # 2	Bayonne
such a rule. They have already played out in California under tl	###########	756 center stree	Dunellen
such a rule. They have already played out in California under tl	###########	85 weymouth rc	Hammonton
such a rule. They have already played out in California under tl	###########	159 mcbride av	Woodland Park
such a rule. They have already played out in California under tl	###########	105 littleton ave	Newark
such a rule. They have already played out in California under tl	###########	774 grove street	Irvington
such a rule. They have already played out in California under tl	###########	103 riptide ave	Manahawkin
such a rule. They have already played out in California under tl	###########	401 emma plac	Linden
such a rule. They have already played out in California under tl	###########	59 marina ln	Brick
such a rule. They have already played out in California under tl	###########	593 rt 94	Columbia
such a rule. They have already played out in California under tl	###########	1703	Barnegat
such a rule. They have already played out in California under tl	###########	old burlington r	Elmer
such a rule. They have already played out in California under tl	###########	226 holmes st	Boonton
such a rule. They have already played out in California under tl	###########	ton close freeho	Freehold
such a rule. They have already played out in California under tl	###########	131 webb r.d.	Absecon
such a rule. They have already played out in California under tl	###########	98 westover driv	Delran
such a rule. They have already played out in California under tl	###########	2 webster street	Ridgefield Park
such a rule. They have already played out in California under tl	###########	1 longwood aver	Cherry Hill
such a rule. They have already played out in California under tl	###########	nville mounntair	Great Meadows
such a rule. They have already played out in California under tl	###########	331 preston ave	Voorhees
such a rule. They have already played out in California under tl	###########	2 emery avenue	Randolph
such a rule. They have already played out in California under tl	###########	2 bedford terrac	Blackwood
such a rule. They have already played out in California under tl	###########	314 sunset place	North Middletow
such a rule. They have already played out in California under tl	###########	839 holmes ave	Vineland
such a rule. They have already played out in California under tl	###########	4301 talbot way	Robbinsville
such a rule. They have already played out in California under tl	###########	n 33rdst cande	Camden
such a rule. They have already played out in California under tl	###########	6beech wood av	Trenton
such a rule. They have already played out in California under tl	###########	107 pine st	Mount Holly
such a rule. They have already played out in California under tl	###########	677 s 14th st	Newark
such a rule. They have already played out in California under tl	###########	erman ave bay	Bayville
such a rule. They have already played out in California under tl	###########	465 wildwood av	Camden
such a rule. They have already played out in California under tl	###########	289 essex st	Hackensack
such a rule. They have already played out in California under tl	###########	w walnut rd, ap	Vineland
such a rule. They have already played out in California under tl	###########	436 ridge road	West Milford
such a rule. They have already played out in California under tl	###########	4 willow court	Hammonton
such a rule. They have already played out in California under tl	###########	537 edpas rd	New Brunswick
such a rule. They have already played out in California under tl	###########	18 concord rd	Lebanon
such a rule. They have already played out in California under tl	###########	llow court irvingt	Elizabeth
such a rule. They have already played out in California under tl	###########	669 clifton ave	Clifton
such a rule. They have already played out in California under tl	###########	2 emery avenue	Randolph

such a rule. They have already played out in California under tl	##########	street newark r	Newark
such a rule. They have already played out in California under tl	##########	136 giles avenue	Middlesex
such a rule. They have already played out in California under tl	##########	126 66th st	West New York
such a rule. They have already played out in California under tl	##########	370 n clinton ave	Trenton
such a rule. They have already played out in California under tl	##########	netherwood ave	Plainfield
such a rule. They have already played out in California under tl	##########	839 holmes ave	Vineland
such a rule. They have already played out in California under tl	##########	520 e front st	Plainfield
such a rule. They have already played out in California under tl	##########	whalers cove p	Galloway
such a rule. They have already played out in California under tl	##########	79 penn st	Bridgeton
such a rule. They have already played out in California under tl	##########	4 elizabeth ave	Montclair
such a rule. They have already played out in California under tl	##########	5 blanchard lane	Sussex
such a rule. They have already played out in California under tl	##########	74 laurel avenu	Irvington
such a rule. They have already played out in California under tl	##########	3 golf lane	Succasunna
such a rule. They have already played out in California under tl	##########	5 elizabeth ave 2	Newark
such a rule. They have already played out in California under tl	##########	107 pine st	Mount Holly
such a rule. They have already played out in California under tl	##########	517 6th ave rear	Belmar
such a rule. They have already played out in California under tl	##########	18 rivendell road	Marmora
such a rule. They have already played out in California under tl	##########	623 pelican lane	Mays Landing
such a rule. They have already played out in California under tl	##########	12 hancock ct	Montville
such a rule. They have already played out in California under tl	##########	9 union landing	Cinnaminson
such a rule. They have already played out in California under tl	##########	river road apt.	Clifton
such a rule. They have already played out in California under tl	##########	26 miller st	Montclair
such a rule. They have already played out in California under tl	##########	105 blackwell rd	Pennington
such a rule. They have already played out in California under tl	##########	83telford street	East Orange
such a rule. They have already played out in California under tl	##########	92 center lane	Mount Laurel
such a rule. They have already played out in California under tl	##########	3213 oakwood d	Hammonton
such a rule. They have already played out in California under tl	##########	370 n clinton ave	Trenton
such a rule. They have already played out in California under tl	##########	40 chambers rd	Cream Ridge
such a rule. They have already played out in California under tl	##########	kingwoodstockto	Stockton
such a rule. They have already played out in California under tl	##########	797 route 54	Williamstown
such a rule. They have already played out in California under tl	##########	520 e front st	Plainfield
such a rule. They have already played out in California under tl	##########	79 penn st	Bridgeton
such a rule. They have already played out in California under tl	##########	14 montgomery	Bloomfield
such a rule. They have already played out in California under tl	##########	80 park ave	Jackson
such a rule. They have already played out in California under tl	##########	2103 alpine trail	Neptune
such a rule. They have already played out in California under tl	##########	472 crawford st	Eatontown
such a rule. They have already played out in California under tl	##########	303 riverfront dri	Palmyra
such a rule. They have already played out in California under tl	##########	13 charlotte drive	Bridgewater
such a rule. They have already played out in California under tl	##########	19 constitution c	North Brunswick
such a rule. They have already played out in California under tl	##########	26 miller st	Montclair
such a rule. They have already played out in California under tl	##########	595 lake blvd	Lindenwold
such a rule. They have already played out in California under tl	##########	2 weymouth driv	Trenton
such a rule. They have already played out in California under tl	##########	207 iowa ave	Hainesport
such a rule. They have already played out in California under tl	##########	103 lily st	Paterson
such a rule. They have already played out in California under tl	##########	26 geneva stree	Elizabethport
such a rule. They have already played out in California under tl	##########	272 magnolia av	Camden
such a rule. They have already played out in California under tl	##########	115 jasmine lane	Williamstown
such a rule. They have already played out in California under tl	##########	501 falcon drive	Absecon
such a rule. They have already played out in California under tl	##########	128 franklin ave	Seaside Heights
such a rule. They have already played out in California under tl	##########	9 willow ave., ap	Hoboken
such a rule. They have already played out in California under tl	##########	32 deer haven rd	Bedminster
such a rule. They have already played out in California under tl	##########	50 may st	Hawthorne
such a rule. They have already played out in California under tl	##########	larion lane rear	Newark
such a rule. They have already played out in California under tl	##########	71 hayward plac	Wallington
such a rule. They have already played out in California under tl	##########	590 hillcrest ter	Union

such a rule. They have already played out in California under tl	###########	6 benson way	Blackwood
such a rule. They have already played out in California under tl	###########	131 franklin terr	Maplewood
such a rule. They have already played out in California under tl	###########	231 beck ave	Somerset
such a rule. They have already played out in California under tl	###########	225 1/2 6ave	Newark
such a rule. They have already played out in California under tl	###########	263 madison st	Passaic
such a rule. They have already played out in California under tl	###########	651 riverview dr	Totowa
such a rule. They have already played out in California under tl	###########	60 mercer stree	Jersey City
such a rule. They have already played out in California under tl	###########	646 e 31st st	Paterson
such a rule. They have already played out in California under tl	###########	58 arborridge dr	Forked River
such a rule. They have already played out in California under tl	###########	40 runnymede r	West Caldwell
such a rule. They have already played out in California under tl	###########	26 academic rd	East Brunswick
such a rule. They have already played out in California under tl	###########	34 rancocas roa	Mount Holly
such a rule. They have already played out in California under tl	###########	13 seventh st. #3	Frenchtown
such a rule. They have already played out in California under tl	###########	stony hill rd	Eatontown
such a rule. They have already played out in California under tl	###########	65 n sussex st	Dover
such a rule. They have already played out in California under tl	###########	92 woodward roa	Manalapan
such a rule. They have already played out in California under tl	###########	74 glen mawr dr	Ewing
such a rule. They have already played out in California under tl	###########	328 oswald pl	Vauxhall
such a rule. They have already played out in California under tl	###########	/. greenway wall	Trenton
such a rule. They have already played out in California under tl	###########	509 barron ave	Woodbridge
such a rule. They have already played out in California under tl	###########	6 lawton rd	Bridgewater
such a rule. They have already played out in California under tl	###########	12 butternut row	Princeton
such a rule. They have already played out in California under tl	###########	1monroe ave	Carteret
such a rule. They have already played out in California under tl	###########	56 morgan way	Monroe Townshi
such a rule. They have already played out in California under tl	###########	591 valley rd	West Orange
such a rule. They have already played out in California under tl	###########	114 lyons ave	Newark
such a rule. They have already played out in California under tl	###########	01 heidelberg a	Egg Harbor City
such a rule. They have already played out in California under tl	###########	vine turner boul	Newark
such a rule. They have already played out in California under tl	###########	416 s cook ave	Trenton
such a rule. They have already played out in California under tl	###########	26 olga b ter	Clifton
such a rule. They have already played out in California under tl	###########	104viera drive	Cedar Knolls
such a rule. They have already played out in California under tl	###########	96 no.oraton pkv	East Orange
such a rule. They have already played out in California under tl	###########	r place fl-1 side	Newark
such a rule. They have already played out in California under tl	###########	117cedar street	Millville
such a rule. They have already played out in California under tl	###########	10 woodland rd	Bayville
such a rule. They have already played out in California under tl	###########	18east main stre	Manville
such a rule. They have already played out in California under tl	###########	ket st, gloucest	Gloucester City
such a rule. They have already played out in California under tl	###########	09 winchester a	Margate City
such a rule. They have already played out in California under tl	###########	6 delacove hom	Beverly
such a rule. They have already played out in California under tl	###########	5 carriage ct	Medford
such a rule. They have already played out in California under tl	###########	2a bayberry lane	Whiting
such a rule. They have already played out in California under tl	###########	1417 falcon dr	Absecon
such a rule. They have already played out in California under tl	###########	30 jefferson stre	Paterson
such a rule. They have already played out in California under tl	###########	31 marshall stre	Paterson
such a rule. They have already played out in California under tl	###########	441 wainwright s	Camden
such a rule. They have already played out in California under tl	###########	1 clearbrook dr	Monroe Townshi
such a rule. They have already played out in California under tl	###########	72 hampton road	Pittstown
such a rule. They have already played out in California under tl	###########	23 bayview driv	Absecon
such a rule. They have already played out in California under tl	###########	0birch hollow dr	Bordentown
such a rule. They have already played out in California under tl	###########	33monticello ave	Newark
such a rule. They have already played out in California under tl	###########	5 east church str	Bergenfield
such a rule. They have already played out in California under tl	###########	129 amberly dr	Manalapan
such a rule. They have already played out in California under tl	###########	20 tomlinson ave	Clementon
such a rule. They have already played out in California under tl	###########	nackenzie lane r	Denville
such a rule. They have already played out in California under tl	###########	3 railroad avenue	May Court Ho

such a rule. They have already played out in California under tl	########### 5 everett st	East Brunswick
such a rule. They have already played out in California under tl	########### 486 oak street	Passaic
such a rule. They have already played out in California under tl	###########'9d dartmoor co	Lakewood
such a rule. They have already played out in California under tl	###########17 black horse pg	Harbor Towns
such a rule. They have already played out in California under tl	########### 47 clark street	Hillside
such a rule. They have already played out in California under tl	###########12 walmer stree	Hammonton
such a rule. They have already played out in California under tl	###########14 tinder box lar	Marlton
such a rule. They have already played out in California under tl	########### 318 birch drive	Roselle
such a rule. They have already played out in California under tl	###########819 bayway ave	Elizabeth
such a rule. They have already played out in California under tl	########### 7 kings	Highlands
such a rule. They have already played out in California under tl	########### 524 schley stree	Hillside
such a rule. They have already played out in California under tl	###########woodlawn ave a	Jersey City
such a rule. They have already played out in California under tl	###########45 marcellus sve	Manasquan
such a rule. They have already played out in California under tl	###########325 evergreen d	Moorestown
such a rule. They have already played out in California under tl	###########ast chestnut ave	Vineland
such a rule. They have already played out in California under tl	########### 08 brookside av	Cresskill
such a rule. They have already played out in California under tl	###########31 n. maple ave	Marlton
such a rule. They have already played out in California under tl	########### 08 brookside av	Cresskill
such a rule. They have already played out in California under tl	########### 27 ginger dr	Edison
such a rule. They have already played out in California under tl	###########12 woodlynne a	Oaklyn
such a rule. They have already played out in California under tl	###########370 hunterdon s	Newark
such a rule. They have already played out in California under tl	########### 3805 myrtle ave	Camden
such a rule. They have already played out in California under tl	###########union avenue ap	Irvington
such a rule. They have already played out in California under tl	###########05 bergen turnp	North Bergen
such a rule. They have already played out in California under tl	###########159 vanard drive	Brick
such a rule. They have already played out in California under tl	########### 80 wallace st	Belleville
such a rule. They have already played out in California under tl	###########308 green tree r	Brick
such a rule. They have already played out in California under tl	########### 38 n21 street	East Orange
such a rule. They have already played out in California under tl	###########5b new haven w	Monroe Townshi
such a rule. They have already played out in California under tl	########### 40miramar dr	Pennsville
such a rule. They have already played out in California under tl	###########01 ridge road ap	Lyndhurst
such a rule. They have already played out in California under tl	###########6 barricklo stree	Trenton
such a rule. They have already played out in California under tl	########### shark river stati	Wall Township
such a rule. They have already played out in California under tl	###########ire ave, patersc	Paterson
such a rule. They have already played out in California under tl	########### 083 sanford av	Irvington
such a rule. They have already played out in California under tl	########### 1081 trent rd	Camden
such a rule. They have already played out in California under tl	########### 255 mary st	Hackensack
such a rule. They have already played out in California under tl	########### shington avenue	Collingswood
such a rule. They have already played out in California under tl	########### east franklin ave	Beverly
such a rule. They have already played out in California under tl	###########6 barricklo stree	Trenton
such a rule. They have already played out in California under tl	########### 28malpe ave	Vauxhall
such a rule. They have already played out in California under tl	########### 1 east front stre	Plainfield
such a rule. They have already played out in California under tl	########### 49 hobson st	Newark
such a rule. They have already played out in California under tl	###########121 prospect ave	Neptune
such a rule. They have already played out in California under tl	########### 70 hialeah ave	Middletown
such a rule. They have already played out in California under tl	########### 29 roselle ave	Cranford
such a rule. They have already played out in California under tl	###########245passaic ave	Passaic
such a rule. They have already played out in California under tl	###########2 honeyflower c	Trenton
such a rule. They have already played out in California under tl	########### 54 monmouth s	Trenton
such a rule. They have already played out in California under tl	###########135 kendall drive	Parlin
such a rule. They have already played out in California under tl	########### 6 south west av	Vineland
such a rule. They have already played out in California under tl	###########3817 arborwood	Lindenwold
such a rule. They have already played out in California under tl	########### 211 myrtle ave	Neptune
such a rule. They have already played out in California under tl	###########342 bristol court	Wenonah
such a rule. They have already played out in California under tl	########### 00 frances cou	Union

such a rule. They have already played out in California under tl	########### 100 perry rd	Woodbine
such a rule. They have already played out in California under tl	########### 162 humbolt sy	Trenton
such a rule. They have already played out in California under tl	########### 1341 north ave	Elizabeth
such a rule. They have already played out in California under tl	########### 2316 us 130	Dayton
such a rule. They have already played out in California under tl	########### 615 franklin st	Elizabethport
such a rule. They have already played out in California under tl	########### 122 magee ave	Lavallette
such a rule. They have already played out in California under tl	########### 2023 milton ave	Neptune
such a rule. They have already played out in California under tl	########### 330 s hook rd	Pennsville
such a rule. They have already played out in California under tl	########### 13-50th	Weehawken
such a rule. They have already played out in California under tl	########### 2 commodore c	Barnegat
such a rule. They have already played out in California under tl	########### meadow run ro	Bordentown
such a rule. They have already played out in California under tl	###########d dennison driv	East Windsor
such a rule. They have already played out in California under tl	###########2813 roosevelt s	Wall Township
such a rule. They have already played out in California under tl	###########2528 tilton rd 84g	Harbor Towns
such a rule. They have already played out in California under tl	###########5 lincroft avenue	Old Bridge
such a rule. They have already played out in California under tl	########### 79 westview rd	Wayne
such a rule. They have already played out in California under tl	########### 52 carroll ave	Williamstown
such a rule. They have already played out in California under tl	########### 909 curtis drive	Pennsville
such a rule. They have already played out in California under tl	###########01 marshall aver	Ventnor City
such a rule. They have already played out in California under tl	########### 315 stites ave	e May Court Ho
such a rule. They have already played out in California under tl	###########09 winding way	Stratford
such a rule. They have already played out in California under tl	###########177 vinton circle	Fanwood
such a rule. They have already played out in California under tl	########### 153 indiana ave	Blackwood
such a rule. They have already played out in California under tl	###########17 pamphylia av	Bridgeton
such a rule. They have already played out in California under tl	########### point pleasant a	Marmora
such a rule. They have already played out in California under tl	########### 9 s main st	Barnegat
such a rule. They have already played out in California under tl	###########earny avenue, a	Edison
such a rule. They have already played out in California under tl	########### 1304	Camden
such a rule. They have already played out in California under tl	###########12franklin avenu	Nutley
such a rule. They have already played out in California under tl	########### 14 oakdale rd	Jersey City
such a rule. They have already played out in California under tl	###########uth stiles street	Linden
such a rule. They have already played out in California under tl	########### 388 river drive	Garfield
such a rule. They have already played out in California under tl	###########ury ln, bridgewat	Bridgewater
such a rule. They have already played out in California under tl	###########9 westminster dr	Toms River
such a rule. They have already played out in California under tl	########### 600 north drive	Wildwood
such a rule. They have already played out in California under tl	########### 100 muirfield rd	Jackson
such a rule. They have already played out in California under tl	########### 1827s s 4th st	Camden
such a rule. They have already played out in California under tl	########### 71jacobsrd	Rockaway
such a rule. They have already played out in California under tl	###########5 e woodland av	Absecon
such a rule. They have already played out in California under tl	###########9 dogwood cour	Cliffwood
such a rule. They have already played out in California under tl	########### 53 taylor st	Newark
such a rule. They have already played out in California under tl	########### 14 fairview ave	Woodcliff Lake
such a rule. They have already played out in California under tl	###########992, mercer roa	Princeton
such a rule. They have already played out in California under tl	########### 490 s 19th str	Newark
such a rule. They have already played out in California under tl	###########9-05 garden vie	East Windsor
such a rule. They have already played out in California under tl	###########54 south broadw	Pennsville
such a rule. They have already played out in California under tl	###########new heckman d	Jersey City
such a rule. They have already played out in California under tl	########### 104 linden ave	Bound Brook
such a rule. They have already played out in California under tl	########### 5 franklin ave	Leonardo
such a rule. They have already played out in California under tl	###########08 pennington a	Trenton
such a rule. They have already played out in California under tl	########### 612 s 8th street	Vineland
such a rule. They have already played out in California under tl	###########09 hudson aven	West New York
such a rule. They have already played out in California under tl	###########30 franklin avenu	Newark
such a rule. They have already played out in California under tl	########### 23 lewis dr	Mays Landing
such a rule. They have already played out in California under tl	###########2310 primrose c	Mays Landing

such a rule. They have already played out in California under tl	##########37 hopewell lane	Sicklerville
such a rule. They have already played out in California under tl	########## 94 union street	Jersey City
such a rule. They have already played out in California under tl	##########3 canterbury co	East Windsor
such a rule. They have already played out in California under tl	########## 45 river dr	Passaic
such a rule. They have already played out in California under tl	########## 150 harvest rd	Swedesboro
such a rule. They have already played out in California under tl	########## 509 monroe st	Hoboken
such a rule. They have already played out in California under tl	##########2 1/2 state stree	Penns Grove
such a rule. They have already played out in California under tl	##########7 south stevens	South Amboy
such a rule. They have already played out in California under tl	##########1 rd egg harbor tg	Harbor Towns
such a rule. They have already played out in California under tl	########## 309 whiton st	Jersey City
such a rule. They have already played out in California under tl	##########175 johnson ave	wrence Townsh
such a rule. They have already played out in California under tl	##########10b yorkshire dr	Monroe Townshi
such a rule. They have already played out in California under tl	##########field ave pleas	Pleasantville
such a rule. They have already played out in California under tl	########## 1209 7th ave	Neptune
such a rule. They have already played out in California under tl	########## 619 bright ct	Newark
such a rule. They have already played out in California under tl	##########3 sheridan aven	Waldwick
such a rule. They have already played out in California under tl	########## 23 kirby ave	Trenton
such a rule. They have already played out in California under tl	##########39 south shore	Toms River
such a rule. They have already played out in California under tl	##########3 willoughby lan	Southampton
such a rule. They have already played out in California under tl	########## 409 briarwood	Williamstown
such a rule. They have already played out in California under tl	##########le ave, metuche	Metuchen
such a rule. They have already played out in California under tl	########## 68 warner ave	Springfield
such a rule. They have already played out in California under tl	########## 206 grove st	Roselle
such a rule. They have already played out in California under tl	##########028 cooper stre	Beverly
such a rule. They have already played out in California under tl	########## 2 hazen ct 31a	Wayne
such a rule. They have already played out in California under tl	########## 712 broadway	Westville
such a rule. They have already played out in California under tl	########## 104 cedar row	Toms River
such a rule. They have already played out in California under tl	##########1market st cam	Camden
such a rule. They have already played out in California under tl	########## 54 w stewart st.	Washington
such a rule. They have already played out in California under tl	########## 545 park ave	East Orange
such a rule. They have already played out in California under tl	########## 31 early st apt	Morristown
such a rule. They have already played out in California under tl	########## 36 manor drive	Hillsborough
such a rule. They have already played out in California under tl	########## 153 park street	East Orange
such a rule. They have already played out in California under tl	########## 43 maple drive	Bridgeton
such a rule. They have already played out in California under tl	##########24west walnut	Newton
such a rule. They have already played out in California under tl	##########25maple avenue	Irvington
such a rule. They have already played out in California under tl	##########e.clements brid	Runnemede
such a rule. They have already played out in California under tl	##########uben ln, south	South Bound Bro
such a rule. They have already played out in California under tl	########## pobox144	Elizabeth
such a rule. They have already played out in California under tl	########## 689 f	Hillsborough
such a rule. They have already played out in California under tl	########## 608 cricket ln.	Woodbridge
such a rule. They have already played out in California under tl	########## 31 regal drive	Colonia
such a rule. They have already played out in California under tl	##########ue is thierry ave	Madison
such a rule. They have already played out in California under tl	##########onnecticut con	Jackson
such a rule. They have already played out in California under tl	##########south harrison s	East Orange
such a rule. They have already played out in California under tl	##########04 cotswold circ	Ocean
such a rule. They have already played out in California under tl	########## 51 freddie ave	Avenel
such a rule. They have already played out in California under tl	##########9 berkshire valle	Oak Ridge
such a rule. They have already played out in California under tl	##########3 w. hanover pla	Trenton
such a rule. They have already played out in California under tl	########## 151 thornhill rd	Cherry Hill
such a rule. They have already played out in California under tl	##########226 garden drive	South Plainfield
such a rule. They have already played out in California under tl	##########30 cedar ln #20	River Vale
such a rule. They have already played out in California under tl	########## 247 jericho rd.	Bridgeton
such a rule. They have already played out in California under tl	########## 24 veeder ln	Bayville
such a rule. They have already played out in California under tl	##########752 trumbull ave	wrence Townsh

such a rule. They have already played out in California under tl	###########	17walnutstreet	Toms River
such a rule. They have already played out in California under tl	###########2	27 william stree	Belleville
such a rule. They have already played out in California under tl	###########	bear branch roa	Trenton
such a rule. They have already played out in California under tl	###########	6 hulses corner	Howell
such a rule. They have already played out in California under tl	###########	119 essex st	Hackensack
such a rule. They have already played out in California under tl	###########2	fallsington plac	Chesterfield
such a rule. They have already played out in California under tl	###########	176 johnson pl	South River
such a rule. They have already played out in California under tl	###########1	georgia ave ap	Atlantic City
such a rule. They have already played out in California under tl	###########	808 dock	Millville
such a rule. They have already played out in California under tl	###########1	ewark ave appt	Jersey City
such a rule. They have already played out in California under tl	###########	9 maida rd	Edison
such a rule. They have already played out in California under tl	###########	191 south hill dr	Westampton
such a rule. They have already played out in California under tl	###########	126 park ave	Paterson
such a rule. They have already played out in California under tl	###########	3705 graham ct	Bridgewater
such a rule. They have already played out in California under tl	###########	88 n haledon av	North Haledon
such a rule. They have already played out in California under tl	###########	74 windsor rd	Oradell
such a rule. They have already played out in California under tl	###########	27 laurel ave	Old Bridge
such a rule. They have already played out in California under tl	###########	33 oak st. apt 4	Hackensack
such a rule. They have already played out in California under tl	###########	89 n post rd	rinceton Junctio
such a rule. They have already played out in California under tl	###########1	stow creek roa	Bridgeton
such a rule. They have already played out in California under tl	###########	17 gerard. dr.	Waldwick
such a rule. They have already played out in California under tl	###########	29 irvington ave	Trenton
such a rule. They have already played out in California under tl	###########	728 elm ave	River Edge
such a rule. They have already played out in California under tl	###########	8 inverness driv	Marlboro
such a rule. They have already played out in California under tl	###########3	4 north main st	New Egypt
such a rule. They have already played out in California under tl	###########	85 prince st	Newark
such a rule. They have already played out in California under tl	###########	318 e state rt 4	Paramus
such a rule. They have already played out in California under tl	###########0	south harrison	East Orange
such a rule. They have already played out in California under tl	###########8	3 roanoke stre	Woodbridge
such a rule. They have already played out in California under tl	###########	17 wyndham rd	Voorhees
such a rule. They have already played out in California under tl	###########	9082683188	Union
such a rule. They have already played out in California under tl	###########2	3 garden state	Cherry Hill
such a rule. They have already played out in California under tl	###########	507 lydia ln	Wyckoff
such a rule. They have already played out in California under tl	###########	85 shore ave	Manahawkin
such a rule. They have already played out in California under tl	###########	7 mt pleasant a	Woodland Park
such a rule. They have already played out in California under tl	###########5	b portsmouth d	Lakewood
such a rule. They have already played out in California under tl	###########2	2 montgomery s	Jersey City
such a rule. They have already played out in California under tl	###########	119 irene ave	Buena
such a rule. They have already played out in California under tl	###########3	beechwood dr	Wayne
such a rule. They have already played out in California under tl	###########	5 forest hills dr	Medford
such a rule. They have already played out in California under tl	###########2	stone mill drive	Pittstown
such a rule. They have already played out in California under tl	###########2	1 maidstone pl	Southampton
such a rule. They have already played out in California under tl	###########	100 atkins ave.	Asbury Park
such a rule. They have already played out in California under tl	###########9	hidden lake dr	North Brunswick
such a rule. They have already played out in California under tl	###########0	earnshaw lan	Willingboro
such a rule. They have already played out in California under tl	###########	537 cascade ct	Sewell
such a rule. They have already played out in California under tl	###########	046 louisa stree	Elizabeth
such a rule. They have already played out in California under tl	###########4	0 washington a	Linden
such a rule. They have already played out in California under tl	###########	43 clement st	Nutley
such a rule. They have already played out in California under tl	###########	1109 53rd st	North Bergen
such a rule. They have already played out in California under tl	###########	116 irving pl	Rutherford
such a rule. They have already played out in California under tl	###########	210 6th ave.	Newark
such a rule. They have already played out in California under tl	###########3	north warwick	Lawnside
such a rule. They have already played out in California under tl	###########	50 s. sunset rd.	Willingboro
such a rule. They have already played out in California under tl	###########3	3 garden terrac	Edison

such a rule. They have already played out in California under tl	########### 14 berekley terr	Plainfield
such a rule. They have already played out in California under tl	########### 31 delta dr	Ocean
such a rule. They have already played out in California under tl	########### 9 east crescent	Mahwah
such a rule. They have already played out in California under tl	########### 9d ari drive	Somerset
such a rule. They have already played out in California under tl	########### 12 forest glen d	Highland Park
such a rule. They have already played out in California under tl	########### 288 delsea dr	Sewell
such a rule. They have already played out in California under tl	###########3692002@yaho	National Park
such a rule. They have already played out in California under tl	###########outh broad st. a	Woodbury
such a rule. They have already played out in California under tl	###########2 kettle creek rc	Toms River
such a rule. They have already played out in California under tl	###########132 berthold ave	Rahway
such a rule. They have already played out in California under tl	########### 32 grant ave	Jersey City
such a rule. They have already played out in California under tl	########### 25 manor drive	Newark
such a rule. They have already played out in California under tl	########### 142 forest dr	Piscataway
such a rule. They have already played out in California under tl	###########0 franklin turnpi	Waldwick
such a rule. They have already played out in California under tl	########### 10 st.ark ct	Ringoes
such a rule. They have already played out in California under tl	###########2 new heckman	Jersey City
such a rule. They have already played out in California under tl	###########2 highbridge blv	Medford
such a rule. They have already played out in California under tl	###########0 10th st. apt. 3	Jersey City
such a rule. They have already played out in California under tl	###########8 tremont ave trg	Harbor Towns
such a rule. They have already played out in California under tl	###########ld new brunswic	Piscataway
such a rule. They have already played out in California under tl	###########pebble beach dig	Harbor Towns
such a rule. They have already played out in California under tl	###########-28 gladstone a	Newark
such a rule. They have already played out in California under tl	###########208 madison ave	Lumberton
such a rule. They have already played out in California under tl	###########0 s burnett st 3r	East Orange
such a rule. They have already played out in California under tl	########### 18 e. price st.	Linden
such a rule. They have already played out in California under tl	########### 490 rena ct	Brick
such a rule. They have already played out in California under tl	###########550 sunhaven d	Clayton
such a rule. They have already played out in California under tl	########### 221 n main st a	Wharton
such a rule. They have already played out in California under tl	###########20 bloomfield av	Bloomfield
such a rule. They have already played out in California under tl	###########23north11thstre	Newark
such a rule. They have already played out in California under tl	########### lincoln ave apt	Newark
such a rule. They have already played out in California under tl	########### 23 holly rd	West Creek
such a rule. They have already played out in California under tl	###########55 new durham	Edison
such a rule. They have already played out in California under tl	########### 30 belle ave	Paterson
such a rule. They have already played out in California under tl	###########prospect ave. a	Hackensack
such a rule. They have already played out in California under tl	########### 225 lorillard ave	Union Beach
such a rule. They have already played out in California under tl	########### 50 ginger drive	Lumberton
such a rule. They have already played out in California under tl	###########55 dorsa avenu	Wayne
such a rule. They have already played out in California under tl	########### 34 chelsea ave	East Orange
such a rule. They have already played out in California under tl	###########2 cumberland b	Toms River
such a rule. They have already played out in California under tl	###########) chesterfield co	Southampton
such a rule. They have already played out in California under tl	########### lampart ave apt	Sicklerville
such a rule. They have already played out in California under tl	########### 247 lloyd rd	Matawan
such a rule. They have already played out in California under tl	########### 70 ann st.# 2	Newark
such a rule. They have already played out in California under tl	########### 1 willow ave. ap	Hoboken
such a rule. They have already played out in California under tl	########### 2272 polk ave	North Brunswick
such a rule. They have already played out in California under tl	###########8 brainerd stree	Mount Holly
such a rule. They have already played out in California under tl	###########' park place apt	Bloomfield
such a rule. They have already played out in California under tl	###########1017simpsonave	Ocean City
such a rule. They have already played out in California under tl	###########! north arlington	East Orange
such a rule. They have already played out in California under tl	###########00 brunswick av	Spotswood
such a rule. They have already played out in California under tl	########### 1184fulton st	Rahway
such a rule. They have already played out in California under tl	###########341-east 28th st	Paterson
such a rule. They have already played out in California under tl	########### 76 grove st	Bloomfield
such a rule. They have already played out in California under tl	###########43 princeton av	Pemberton

such a rule. They have already played out in California under tl	###########	176 tryens dr	Mays Landing
such a rule. They have already played out in California under tl	###########	281 union ave	New Providence
such a rule. They have already played out in California under tl	###########	4 winfield drive	Parsippany
such a rule. They have already played out in California under tl	###########	alumbia valley r	Andover
such a rule. They have already played out in California under tl	###########	832 browning p	Mount Laurel
such a rule. They have already played out in California under tl	###########	17 reservoir rd	Stewartsville
such a rule. They have already played out in California under tl	###########	615s.clinton	Trenton
such a rule. They have already played out in California under tl	###########	5, sylvan way.	Short Hills
such a rule. They have already played out in California under tl	###########	257 hoover ave	Bloomfield
such a rule. They have already played out in California under tl	###########	1 thousand oaks	tlantic Highland
such a rule. They have already played out in California under tl	###########	533shermanave	Belford
such a rule. They have already played out in California under tl	###########	69 oak st	Carteret
such a rule. They have already played out in California under tl	###########	hitehorse merce	Trenton
such a rule. They have already played out in California under tl	###########	1 division street	Port Monmouth
such a rule. They have already played out in California under tl	###########	5 hunt walk apt	Bergenfield
such a rule. They have already played out in California under tl	###########	300 lincoln st	Linden
such a rule. They have already played out in California under tl	###########	25 center st	Elmer
such a rule. They have already played out in California under tl	###########	westfield nj	Westfield
such a rule. They have already played out in California under tl	###########	17 college drive	Jersey City
such a rule. They have already played out in California under tl	###########	0 saint marys dr	Cherry Hill
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such a rule. They have already played out in California under tl	###########	72 hobart avenu	Trenton
such a rule. They have already played out in California under tl	###########	213 8th avenue	Hammonton
such a rule. They have already played out in California under tl	###########	1426 w main st	Millville
such a rule. They have already played out in California under tl	###########	320 partridge ru	int Pleasant Bea
such a rule. They have already played out in California under tl	###########	572beechave	Saddle Brook
such a rule. They have already played out in California under tl	###########	156 syringa st	Browns Mills
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such a rule. They have already played out in California under tl	###########	160 w 32nd st	Bayonne
such a rule. They have already played out in California under tl	###########	32union street	Burlington
such a rule. They have already played out in California under tl	###########	409 front street	Dunellen
such a rule. They have already played out in California under tl	###########	7634 joseph st	Millville

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NJ	08540
NJ	07003
NJ	07111
NJ	08204
NJ	07648
NJ	07002
NJ	08016
NJ	08812
NJ	08332

From: mary beth gifford (mbgif710@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
mary beth gifford
198 westover drive
Delran, NJ 08075
mbgif710@gmail.com

From: barbara l brady (blbrady223@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
barbara l brady
32 danville mounntain road
Great Meadows, NJ 07838
blbrady223@yahoo.com

From: diana hernandez (dh151507315@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
diana hernandez
12 15 saddle river rd
Fair Lawn, NJ 07410
dh151507315@gmail.com

From: steven austin (charlotteaustin110@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
steven austin
490 park ave 4c
Paterson, NJ 07504
charlotteaustin110@gmail.com

From: jackie warfle (112jackiew@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jackie warfle
112 foam rd
Millville, NJ 08332
112jackiew@gmail.com

From: darren payton (apaysinger75@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
darren payton
470 broadway # 209
Bayonne, NJ 07002
apaysinger75@yahoo.com

From: tori clemens (tclemens756@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tori clemens
756 center street
Dunellen, NJ 08812
tclemens756@gmail.com

From: sharon philpot (philpotsharon@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
sharon philpot
7285 weymouth road
Hammonton, NJ 08037
philpotsharon@gmail.com

From: melissa thompson (owenkids54@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
melissa thompson
1159 mcbride ave
Woodland Park, NJ 07424
owenkids54@gmail.com

From: linda kettel (lindahillkettell@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
linda kettel
105 littleton ave
Newark, NJ 07107
lindahillkettell@gmail.com

From: robin wint (robinwint2022@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
robin wint
774 grove street
Irvington, NJ 07111
robinwint2022@gmail.com

From: roberta trautweiler (extrmrads@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
roberta trautweiler
103 riptide ave
Manahawkin, NJ 08050
extrmrads@yahoo.com

From: elly alicia (sazules04@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
elly alicia
1401 emma place
Linden, NJ 07036
sazules04@yahoo.com

From: gary stevens (stevens.gary1952@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
gary stevens
59 marina ln
Brick, NJ 08724
stevens.gary1952@gmail.com

From: jackie unangst (jrpb4@embarqmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jackie unangst
593 rt 94
Columbia, NJ 07832
jrpb4@embarqmail.com

From: tammy stiles (tammystilesrn@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tammy stiles
1703
Barnegat, NJ 08005
tammystilesrn@gmail.com

From: nolan carney (nolan.carney98@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
nolan carney
345 old burlington road
Elmer, NJ 08318
nolan.carney98@gmail.com

From: janet middleton (jjanetm15@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
janet middleton
226 holmes st
Boonton, NJ 07005
jjanetm15@gmail.com

From: jeanette danna (jdanna1206@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
jeanette danna
67 jaffreyton close freehold 07728
Freehold, NJ 07728
jdanna1206@gmail.com

From: jeff pattison jr (jytterbug1340@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
jeff pattison jr
131 webb r.d.
Absecon, NJ 08201
jytterbug1340@gmail.com

From: mary beth gifford (mbgif710@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
mary beth gifford
198 westover drive
Delran, NJ 08075
mbgif710@gmail.com

From: gina izquierdo (gina.iz19@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
gina izquierdo
2 webster street
Ridgefield Park, NJ 07660
gina.iz19@yahoo.com

From: joanne troiani (frankandjoannet@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
joanne troiani
901 longwood avenue
Cherry Hill, NJ 08002
frankandjoannet@gmail.com

From: barbara l brady (blbrady223@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
barbara l brady
32 danville mounntain road
Great Meadows, NJ 07838
blbrady223@yahoo.com

From: sandy skversky (sskversky324@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sandy skversky
331 preston ave
Voorhees, NJ 08043
sskversky324@gmail.com

From: janet roberts (robertsjanet384@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
janet roberts
2 emery avenue
Randolph, NJ 07869
robertsjanet384@gmail.com

From: martha mccormick (ndmarty10@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
martha mccormick
2 bedford terrace
Blackwood, NJ 08012
ndmarty10@hotmail.com

From: joyce hock (joycehock1949@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
joyce hock
614 sunset place
North Middletown, NJ 07748
joycehock1949@gmail.com

From: stephanie reska (plib6872@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
stephanie reska
839 holmes ave
Vineland, NJ 08361
plib6872@yahoo.com

From: dianne phelan (dzphelan@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

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Yours sincerely,
dianne phelan
4301 talbot way
Robbinsville, NJ 08691
dzphelan@gmail.com

From: justo medina (justomedina92@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
justo medina
1024 n 33rdst candente nj
Camden, NJ 08105
justomedina92@gmail.com

From: annemarie boothe (annemarieboothe@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
annemarie boothe
66beech wood ave
Trenton, NJ 08618
annemarieboothe@yahoo.com

From: melissa tress (melnsam16@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
melissa tress
107 pine st
Mount Holly, NJ 08060
melnsam16@gmail.com

From: chamber stable (chambers1375@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
chamber stable
677 s 14th st
Newark, NJ 07103
chambers1375@gmail.com

From: joseph ricciardi (jricc123@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
joseph ricciardi
90 sherman ave bayville nj
Bayville, NJ 08721
jricc123@yahoo.com

From: tracy brokenboro (bnbtracychase@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tracy brokenboro
1465 wildwood ave
Camden, NJ 08103
bnbtracychase@gmail.com

From: isaac allman (sammivazquez88@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
isaac allman
289 essex st
Hackensack, NJ 07601
sammivazquez88@gmail.com

From: diane pittman (dpittman957@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
diane pittman
476 w walnut rd, apt 52
Vineland, NJ 08360
dpittman957@gmail.com

From: candice earl (tomcandyearl@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
candice earl
436 ridge road
West Milford, NJ 07480
tomcandyearl@gmail.com

From: marty sievers (mjls@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
marty sievers
4 willow court
Hammonton, NJ 08037
mjls@comcast.net

From: ken skistimas (kenskizleo@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
ken skistimas
537 edpas rd
New Brunswick, NJ 08901
kenskizleo@icloud.com

From: amanda mcgill (amcgill294@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
amanda mcgill
18 concord rd
Lebanon, NJ 08833
amcgill294@icloud.com

From: debra thorne (debrathorne1956@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
debra thorne
303 willow court irvington ave
Elizabeth, NJ 07208
debrathorne1956@gmail.com

From: doores guttmann (doloresguttmann@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
doores guttmann
669 clifton ave
Clifton, NJ 07011
doloresguttmann@gmail.com

From: janet roberts (robertsjanet384@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
janet roberts
2 emery avenue
Randolph, NJ 07869
robertsjanet384@gmail.com

From: david marshall (marshall77@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
david marshall
95nt stone street newark new jersey
Newark, NJ 07104
marshall77@gmail.com

From: cheryl reilly (reillycheryl0169@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
cheryl reilly
436 giles avenue
Middlesex, NJ 08846
reillycheryl0169@gmail.com

From: cecilia villarreal (cachita.villa@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
cecilia villarreal
126 66th st
West New York, NJ 07093
cachita.villa@gmail.com

From: laytona blackshear (lblackshear40@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
laytona blackshear
370 n clinton ave
Trenton, NJ 08638
lblackshear40@gmail.com

From: chris watson (lwatson1201@live.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

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Yours sincerely,
chris watson
netherwood ave
Plainfield, NJ 07062
lwatson1201@live.com

From: stephanie reska (plib6872@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
stephanie reska
839 holmes ave
Vineland, NJ 08361
plib6872@yahoo.com

From: bobbie sloan (sloanbobbie65@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
bobbie sloan
520 e front st
Plainfield, NJ 07060
sloanbobbie65@gmail.com

From: joyce walerzak (joycewalerzak22@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
joyce walerzak
723 whalers cove place
Galloway, NJ 08205
joycewalerzak22@yahoo.com

From: jarrod phillips (jarrod.phillips23@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
jarrod phillips
79 penn st
Bridgeton, NJ 08302
jarrod.phillips23@hotmail.com

From: chane mcre (egypt721@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
chane mcre
4 elizabeth ave
Montclair, NJ 07112
egypt721@yahoo.com

From: wanda wilson (bobwan730@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
wanda wilson
6 blanchard lane
Sussex, NJ 07461
bobwan730@aol.com

From: darrin groomes (darrin1305@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
darrin groomes
174 laurel avenue
Irvington, NJ 07111
darrin1305@gmail.com

From: angelo mari (acmari@optonline.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
angelo mari
3 golf lane
Succasunna, NJ 07876
acmari@optonline.net

From: jahada kellam (zadii@live.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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jahada kellam
515 elizabeth ave 22b
Newark, NJ 07112
zadii@live.com

From: melissa tress (melnsam16@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
melissa tress
107 pine st
Mount Holly, NJ 08060
melnsam16@gmail.com

From: devon worster (devworster@netscape.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
devon worster
517 6th ave rear
Belmar, NJ 07719
devworster@netscape.net

From: robert l smith (rsmith9552@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
robert l smith
18 rivendell road
Marmora, NJ 08223
rsmith9552@aol.com

From: patti scharfetter (pscharfetter@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
patti scharfetter
623 pelican lane
Mays Landing, NJ 08330
pscharfetter@icloud.com

From: theresa sullivan (tssulli@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
theresa sullivan
12 hancock ct
Montville, NJ 07045
tssulli@gmail.com

From: derek johns (drkjohns24@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
derek johns
909 union landing rd
Cinnaminson, NJ 08077
drkjohns24@gmail.com

From: eric ganguly (eganguly@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
eric ganguly
24 river road apt. 12
Clifton, NJ 07014
eganguly@hotmail.com

From: claudine marshall (cmarshall26@verizon.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
claudine marshall
26 miller st
Montclair, NJ 07042
cmarshall26@verizon.net

From: sandra lacasse (sanlc1@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sandra lacasse
105 blackwell rd
Pennington, NJ 08534
sanlc1@aol.com

From: evendia savage (evendia2000@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
evendia savage
83telford street
East Orange, NJ 07018
evendia2000@yahoo.com

From: joe sykes (josephsykes92@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
joe sykes
92 center lane
Mount Laurel, NJ 08054
josephsykes92@comcast.net

From: michael somogy (mjsomogy@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
michael somogy
3213 oakwood dr
Hammonton, NJ 08037
mjsomogy@yahoo.com

From: laytona blackshear (lblackshear40@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
laytona blackshear
370 n clinton ave
Trenton, NJ 08638
lblackshear40@gmail.com

From: johanna jones (johannajones.5865@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
johanna jones
40 chambers rd
Cream Ridge, NJ 08514
johannajones.5865@gmail.com

From: mark wiley (wileysgreenhouse@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
mark wiley
167kingwoodstockton rd
Stockton, NJ 08559
wileysgreenhouse@gmail.com

From: darrin stalling (dstallin@rcsj.edu)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
darrin stalling
797 route 54
Williamstown, NJ 08094
dstallin@rcsj.edu

From: bobbie sloan (sloanbobbie65@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
bobbie sloan
520 e front st
Plainfield, NJ 07060
sloanbobbie65@gmail.com

From: jarrod phillips (jarrod.phillips23@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jarrod phillips
79 penn st
Bridgeton, NJ 08302
jarrod.phillips23@hotmail.com

From: kevin burrus (kevinomniburrus@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kevin burrus
114 montgomery st
Bloomfield, NJ 07003
kevinomniburrus@gmail.com

From: lisa kristiansen (lkristiansen36@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
lisa kristiansen
80 park ave
Jackson, NJ 08527
lkristiansen36@gmail.com

From: tc tolliver (tctolliver1@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tc tolliver
2103 alpine trail
Neptune, NJ 07753
tctolliver1@aol.com

From: kathy lapolla (kathylapolla472@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kathy lapolla
472 crawford st
Eatontown, NJ 07724
kathylapolla472@gmail.com

From: susan trifiletti (suetrifiletti2@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
susan trifiletti
5803 riverfront drive
Palmyra, NJ 08065
suetrifiletti2@gmail.com

From: jessica black (zodie3@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jessica black
13 charlotte drive
Bridgewater, NJ 08807
zodie3@aol.com

From: janice henshaw (jlowellh@optonline.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
janice henshaw
219 constitution cir
North Brunswick, NJ 08902
jlowellh@optonline.net

From: claudine marshall (cmarshall26@verizon.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
claudine marshall
26 miller st
Montclair, NJ 07042
cmarshall26@verizon.net

From: tracey wheeler (wheelert390@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tracey wheeler
595 lake blvd
Lindenwold, NJ 08021
wheelert390@gmail.com

From: gail crucili (gailcrucili1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
gail crucili
22 weymouth drive
Trenton, NJ 08610
gailcrucili1@gmail.com

From: trisha longnecker (tyson8185.tj@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
trisha longnecker
207 iowa ave
Hainesport, NJ 08036
tyson8185.tj@gmail.com

From: joseck mogaka (nephaed@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
joseck mogaka
103 lily st
Paterson, NJ 07522
nephaed@yahoo.com

From: barbara raymond (barbararaymond@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
barbara raymond
26 geneva street
Elizabethport, NJ 07206
barbararaymond@gmail.com

From: dora nelly gonzalez paz (dorangonzalez64@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
dora nelly gonzalez paz
1272 magnolia ave
Camden, NJ 08103
dorangonzalez64@gmail.com

From: ralph oliva (fangear162@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
ralph oliva
115 jasmine lane
Williamstown, NJ 08094
fangear162@comcast.net

From: glenda piedra (lumina092@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
glenda piedra
501 falcon drive
Absecon, NJ 08201
lumina092@aol.com

From: linda francese (gramig61149@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
linda francese
128 franklin ave
Seaside Heights, NJ 08751
gramig61149@gmail.com

From: michele hodges (michelehodges0428@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
michele hodges
1219 willow ave., apt 35
Hoboken, NJ 07030
michelehodges0428@icloud.com

From: greg marto (gregpmarto@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
greg marto
82 deer haven rd
Bedminster, NJ 07921
gregpmarto@gmail.com

From: brittany statuto (bstatuto@montenido.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
brittany statuto
50 may st
Hawthorne, NJ 07506
bstatuto@montenido.com

From: eve littles (evelynlittles57@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
eve littles
23 clarion lane rear door
Newark, NJ 07103
evelynlittles57@gmail.com

From: joyce rozek (rozekjoyce@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
joyce rozek
71 hayward place
Wallington, NJ 07057
rozekjoyce@yahoo.com

From: robert mcnair (rmcnair223@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
robert mcnair
1590 hillcrest terrs
Union, NJ 07083
rmcnair223@aol.com

From: tyrese daniels (tybklyn218@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tyrese daniels
6 benson way
Blackwood, NJ 08012
tybklyn218@aol.com

From: edwin walker (edwin.walker46@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
edwin walker
131 franklin terr
Maplewood, NJ 07040
edwin.walker46@gmail.com

From: christine harwood (charwood0719@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
christine harwood
231 beck ave
Somerset, NJ 08873
charwood0719@gmail.com

From: james smith (jdl10473@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
james smith
225 1/2 6ave
Newark, NJ 07107
jdl10473@gmail.com

From: samuel espinal (samywar2323@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
samuel espinal
263 madison st
Passaic, NJ 07055
samywar2323@gmail.com

From: sherril sakas (blitztoy@optonline.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sherril sakas
651 riverview dr
Totowa, NJ 07512
blitztoy@optonline.net

From: kimberly exum (kexum34@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kimberly exum
460 mercer street
Jersey City, NJ 07302
kexum34@gmail.com

From: lliser martinez (giselleterrero@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
lliser martinez
646 e 31st st
Paterson, NJ 07513
giselleterrero@gmail.com

From: tony zappulla (tonyzap47@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
tony zappulla
58 arborridge dr
Forked River, NJ 08731
tonyzap47@gmail.com

From: gee buonocore (geebuonocore@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
gee buonocore
240 runnymede rd
West Caldwell, NJ 07006
geebuonocore@icloud.com

From: allen roth (allenstevenroth@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
allen roth
26 academic rd
East Brunswick, NJ 08816
allenstevenroth@gmail.com

From: doris jenkins (dorisjenkins114@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
doris jenkins
234 rancocas road
Mount Holly, NJ 08060
dorisjenkins114@gmail.com

From: shelley cramer (mum.shelleyrae@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
shelley cramer
13 seventh st. #3
Frenchtown, NJ 08825
mum.shelleyrae@gmail.com

From: patricia y (triciagill53@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
patricia y
stony hill rd
Eatontown, NJ 07724
triciagill53@gmail.com

From: bob morris (bobmorris.motown@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
bob morris
65 n sussex st
Dover, NJ 07801
bobmorris.motown@gmail.com

From: ozlem ibis (ozlemibis21@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
ozlem ibis
192 woodward road
Manalapan, NJ 07726
ozlemibis21@gmail.com

From: linda libby (pyewacketnj@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
linda libby
74 glen mawr dr
Ewing, NJ 08618
pyewacketnj@aol.com

From: mona thornton (mtpreacherwife71@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
mona thornton
328 oswald pl
Vauxhall, NJ 07088
mtpreacherwife71@gmail.com

From: terry travers (terry29travers@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
terry travers
29 w. greenway walkway
Trenton, NJ 08618
terry29travers@yahoo.com

From: dot pisapia (dotpisapia@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
dot pisapia
509 barron ave
Woodbridge, NJ 07095
dotpisapia@gmail.com

From: mary ann tucker (matucker2014@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
mary ann tucker
6 lawton rd
Bridgewater, NJ 08807
matucker2014@gmail.com

From: mohamed shaheen (mohamed9striker@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
mohamed shaheen
12 butternut row
Princeton, NJ 08540
mohamed9striker@yahoo.com

From: rose marie sing (rosemingo4@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
rose marie sing
1monroe ave
Carteret, NJ 07008
rosemingo4@gmail.com

From: daksha dhanani (daksha1125@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
daksha dhanani
56 morgan way
Monroe Township, NJ 08831
daksha1125@gmail.com

From: tammy dunbar (tammydunbar63@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tammy dunbar
591 valley rd
West Orange, NJ 07052
tammydunbar63@yahoo.com

From: tammie carter (tammiedcarter@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tammie carter
114 lyons ave
Newark, NJ 07112
tammiedcarter@icloud.com

From: michael brunetti (mjb6503@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
michael brunetti
601 heidelberg ave
Egg Harbor City, NJ 08215
mjb6503@yahoo.com

From: aaron mitchell (aaron.mitchell1955@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
aaron mitchell
301 irvine turner boulevard
Newark, NJ 07108
aaron.mitchell1955@gmail.com

From: nadia julien bowser (jazz203buzzee@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
nadia julien bowser
416 s cook ave
Trenton, NJ 08629
jazz203buzzee@yahoo.com

From: james finan (jamesrfinan1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
james finan
26 olga b ter
Clifton, NJ 07013
jamesrfinan1@gmail.com

From: lorraine sellitto (rain020@optomline.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
lorraine sellitto
104viera drive
Cedar Knolls, NJ 07927
rain020@optomline.net

From: margaret smith (mseastorange@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
margaret smith
196 no.oraton pkwy
East Orange, NJ 07017
mseastorange@comcast.net

From: edna patrick (ednapatrick57@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
edna patrick
22 custer place fl-1 side entrance
Newark, NJ 07112
ednapatrick57@gmail.com

From: john testa (slickjt36@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
john testa
117cedar street
Millville, NJ 08332
slickjt36@aol.com

From: allen brouwer (akbrouwer3@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
allen brouwer
10 woodland rd
Bayville, NJ 08721
akbrouwer3@gmail.com

From: francis murphy (bearman6420@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
francis murphy
518east main street
Manville, NJ 08835
bearman6420@yahoo.com

From: robert farlow jr (bobbyfarlow942@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
robert farlow jr
613 market st, gloucester city, nj
Gloucester City, NJ 08030
bobbyfarlow942@gmail.com

From: debra paikoff (dspaikoff@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
debra paikoff
9409 winchester ave
Margate City, NJ 08402
dspaikoff@comcast.net

From: stephanie ferris (sgd92623@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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stephanie ferris
146 delacove homes
Beverly, NJ 08010
sgd92623@yahoo.com

From: tom brugger (tombrugger30@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
tom brugger
5 carriage ct
Medford, NJ 08055
tombrugger30@gmail.com

From: betty baker (beejaybee@verizon.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
betty baker
2a bayberry lane
Whiting, NJ 08759
beejaybee@verizon.net

From: destini vena (destinichild2001@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
destini vena
1417 falcon dr
Absecon, NJ 08201
destinichild2001@gmail.com

From: ardie ferrell (ardieferrell@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
ardie ferrell
180 jefferson street
Paterson, NJ 07522
ardieferrell@gmail.com

From: sharleen rawls (sharleenwilliams76@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sharleen rawls
361 marshall street
Paterson, NJ 07503
sharleenwilliams76@gmail.com

From: jannette ames (jannetteames113@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jannette ames
2441 wainwright st
Camden, NJ 08104
jannetteames113@gmail.com

From: porter ritchie (presenters.osta@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
porter ritchie
1 clearbrook dr
Monroe Township, NJ 08831
presenters.osta@gmail.com

From: russell bauman (cbauman2000@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
russell bauman
72 hampton road
Pittstown, NJ 08867
cbauman2000@aol.com

From: nannette obrikis (nsobrikis@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
nannette obrikis
123 bayview drive
Absecon, NJ 08201
nsobrikis@gmail.com

From: anthony velez (velezant0904@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
anthony velez
320birch hollow drive
Bordentown, NJ 08505
velezant0904@gmail.com

From: wilbert johnson (wiljohn6014@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
wilbert johnson
33monticello ave
Newark, NJ 07106
wiljohn6014@gmail.com

From: elizabeth purswani (epurswani@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
elizabeth purswani
206 east church street
Bergenfield, NJ 07621
epurswani@yahoo.com

From: fran rosenbluth (fran.rosenbluth@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
fran rosenbluth
129 amberly dr
Manalapan, NJ 07726
fran.rosenbluth@gmail.com

From: angela jacobs (ajacobs626@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
angela jacobs
20 tomlinson ave
Clementon, NJ 08021
ajacobs626@yahoo.com

From: richard miller (bearandren@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
richard miller
34 mackenzie lane north
Denville, NJ 07834
bearandren@gmail.com

From: devon ford (devonford71@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
devon ford
8 railroad avenue
Cape May Court House, NJ 08210
devonford71@yahoo.com

From: shawn mclauthlin (getsnolove@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
shawn mclauthlin
5 everett st
East Brunswick, NJ 08816
getsnolove@aol.com

From: diane kaplan (diannakaplan9@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
diane kaplan
486 oak street
Passaic, NJ 07055
diannakaplan9@gmail.com

From: brian ogorman (bogorman207@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
brian ogorman
479d dartmoor court
Lakewood, NJ 08701
bogorman207@gmail.com

From: michael daisey (mikedaifrmnj@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
michael daisey
6817 black horse pike
Egg Harbor Township, NJ 08234
mikedaifrmnj@yahoo.com

From: robin mcrae (robinmcrae63@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
robin mcrae
47 clark street
Hillside, NJ 07205
robinmcrae63@gmail.com

From: donald hewitt (hewittdon178@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
donald hewitt
312 walmer street
Hammonton, NJ 08037
hewittdon178@gmail.com

From: ronald lynch (castle96@verizon.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
ronald lynch
214 tinder box lane
Marlton, NJ 08053
castle96@verizon.net

From: monique adams (motayadams@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
monique adams
318 birch drive
Roselle, NJ 07203
motayadams@gmail.com

From: juan medina (jmedinavargas57@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
juan medina
819 bayway ave
Elizabeth, NJ 07202
jmedinavargas57@gmail.com

From: james morgan (kingstjimmy@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
james morgan
7 kings
Highlands, NJ 07732
kingstjimmy@aol.com

From: brathwaite jne (jne.brathwaite@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
brathwaite jne
1524 schley street
Hillside, NJ 07205
jne.brathwaite@gmail.com

From: rasheea vidal (rasheeag24@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
rasheea vidal
44 woodlawn ave apt 2
Jersey City, NJ 07305
rasheeag24@gmail.com

From: kristine forcillo (kforcillo@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kristine forcillo
45 marcellus sve
Manasquan, NJ 08736
kforcillo@gmail.com

From: angela mccormick (piscesrule@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
angela mccormick
325 evergreen dr
Moorestown, NJ 08057
piscesrule@aol.com

From: charles morris (charlesmorris726@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
charles morris
1123 east chestnut ave apt c4
Vineland, NJ 08360
charlesmorris726@gmail.com

From: jennifer grubecki (jgrubecki0701@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jennifer grubecki
108 brookside ave
Cresskill, NJ 07626
jgrubecki0701@gmail.com

From: marie schreiber (tunes113@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
marie schreiber
31 n. maple ave.
Marlton, NJ 08053
tunes113@gmail.com

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To: David Fish (David.Fish@dol.nj.gov)

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jennifer grubecki
108 brookside ave
Cresskill, NJ 07626
jgrubecki0701@gmail.com

From: edna barcenilla (edna.barcenilla@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
edna barcenilla
27 ginger dr
Edison, NJ 08837
edna.barcenilla@yahoo.com

From: noemi rivera (nallo-nene6@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
noemi rivera
1812 woodlynne ave
Oaklyn, NJ 08107
nallo-nene6@hotmail.com

From: william ayimadu (ayimaduwi@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
william ayimadu
670 hunterdon st
Newark, NJ 07108
ayimaduwi@gmail.com

From: daniel collazo (collazodaniel2nd@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
daniel collazo
3805 myrtle ave
Camden, NJ 08105
collazodaniel2nd@gmail.com

From: lindsay hayes (lindsayhayes@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
lindsay hayes
81union avenue apt4e
Irvington, NJ 07111
lindsayhayes@gmail.com

From: kimberly clark (kimberlyclark6329@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
kimberly clark
3505 bergen turnpike
North Bergen, NJ 07047
kimberlyclark6329@gmail.com

From: elaine loprete (bella_20002000@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
elaine loprete
159 vanard drive
Brick, NJ 08723
bella_20002000@yahoo.com

From: mauricio fernandez (ludo2525.mf@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
mauricio fernandez
80 wallace st
Belleville, NJ 07109
ludo2525.mf@gmail.com

From: donna grosch (donnababes@outlook.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
donna grosch
308 green tree rd
Brick, NJ 08724
donnababes@outlook.com

From: tomas pena (tomaspenabk@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
tomas pena
38 n21 street
East Orange, NJ 07017
tomaspenabk@aol.com

From: joe haff (jodohaff@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
joe haff
465b new haven way
Monroe Township, NJ 08831
jodohaff@comcast.net

From: wayne leino (wleino@msn.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
wayne leino
40miramar dr
Pennsville, NJ 08070
wleino@msn.com

From: daniel mcshane (dmcshane321@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
daniel mcshane
701 ridge road apt5
Lyndhurst, NJ 07071
dmcshane321@gmail.com

From: deborah negron (negrl6@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
deborah negron
46 barricklo street
Trenton, NJ 08610
negrl6@aol.com

From: frank evans (frankevans@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
frank evans
573 shark river station rd
Wall Township, NJ 07727
frankevans@gmail.com

From: bernadine battle (battlebernadinet@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
bernadine battle
309berkshire ave, paterson n j 0750
Paterson, NJ 07502
battlebernadinet@gmail.com

From: rebecca mcghee (rebeccamcghee0@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
rebecca mcghee
1083 sanford ave
Irvington, NJ 07111
rebeccamcghee0@yahoo.com

From: april thornton (thorntondeane@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
april thornton
1081 trent rd
Camden, NJ 08104
thorntondeane@gmail.com

From: wieslaw rutkiewicz (marecki21255@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
wieslaw rutkiewicz
255 mary st
Hackensack, NJ 07601
marecki21255@gmail.com

From: nicki carroll (nickic3@verizon.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
nicki carroll
30 washington avenue #711
Collingswood, NJ 08108
nickic3@verizon.net

From: judith walker (j8619320@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
judith walker
305 east franklin avenue
Beverly, NJ 08010
j8619320@gmail.com

From: deborah negron (negrl6@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
deborah negron
46 barricklo street
Trenton, NJ 08610
negrl6@aol.com

From: kelvin goode (goodekelvin872@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kelvin goode
28malpe ave
Vauxhall, NJ 07088
goodekelvin872@gmail.com

From: oyenuga deroju (derojuoyenuga1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
oyenuga deroju
911 east front street
Plainfield, NJ 07062
derojuoyenuga1@gmail.com

From: alphonso giles (alphonsogiles74@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
alphonso giles
49 hobson st
Newark, NJ 07112
alphonsogiles74@gmail.com

From: rick matson (farpost22@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
rick matson
121 prospect ave
Neptune, NJ 07753
farpost22@aol.com

From: michael healy (mhealy1@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
michael healy
70 hialeah ave
Middletown, NJ 07748
mhealy1@comcast.net

From: george brown (silverstreak1us@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
george brown
29 roselle ave
Cranford, NJ 07016
silverstreak1us@yahoo.com

From: pedro ocasio (jupiter_estrella@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
pedro ocasio
245passaic ave.
Passaic, NJ 07055
jupiter_estrella@hotmail.com

From: charles klosinski (kazreg62@verizon.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
charles klosinski
62 honeyflower dr
Trenton, NJ 08620
kazreg62@verizon.net

From: lisa lee (rasheedalee67@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
lisa lee
154 monmouth st
Trenton, NJ 08609
rasheedalee67@gmail.com

From: sandra fitzgerald (sandyfitz333@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sandra fitzgerald
135 kendall drive
Parlin, NJ 08859
sandyfitz333@gmail.com

From: yaritza pineda (pinedayari122210@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
yaritza pineda
16 south west ave
Vineland, NJ 08360
pinedayari122210@gmail.com

From: lynette lewis (hcasquite@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
lynette lewis
3817 arborwood
Lindenwold, NJ 08021
hcasquite@gmail.com

From: michael thornton (mthornton07753@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
michael thornton
211 myrtle ave
Neptune, NJ 07753
mthornton07753@gmail.com

From: renee witkowski (reneepolicella@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
renee witkowski
342 bristol court
Wenonah, NJ 08090
reneepolicella@gmail.com

From: michael mooney (mmoon13@outlook.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
michael mooney
100 frances court
Union, NJ 07083
mmoon13@outlook.com

From: cheryl rose (babybearccc@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
cheryl rose
100 perry rd
Woodbine, NJ 08270
babybearccc@hotmail.com

From: tonia rahim (toniarenee4403@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tonia rahim
162 humbolt sy
Trenton, NJ 08618
toniarenee4403@icloud.com

From: veronica jones (ronhaz560@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
veronica jones
1341 north ave
Elizabeth, NJ 07208
ronhaz560@gmail.com

From: david doby (david.doby321@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
david doby
2316 us 130
Dayton, NJ 08810
david.doby321@gmail.com

From: belleza corporal (gonzalezbaezrosamaria@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
belleza corporal
615 franklin st
Elizabethport, NJ 07206
gonzalezbaezrosamaria@gmail.com

From: kim toscano (ktoscano158@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
kim toscano
122 magee ave
Lavallette, NJ 08735
ktoscano158@aol.com

From: katrina lee (leekatrina568@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
katrina lee
2023 milton ave
Neptune, NJ 07753
leekatrina568@gmail.com

From: cynthia polk (cyndypolk@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
cynthia polk
330 s hook rd
Pennsville, NJ 08070
cyndypolk@hotmail.com

From: juana morejon (jmmorejon07@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
juana morejon
13-50th
Weehawken, NJ 07086
jmmorejon07@gmail.com

From: jessica santiago (puertorican78chocolate30@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jessica santiago
12 commodore ct
Barnegat, NJ 08005
puertorican78chocolate30@yahoo.com

From: karoline hanna (karolinehome2030@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
karoline hanna
43 meadow run road
Bordentown, NJ 08505
karolinehome2030@gmail.com

From: ellen marshall (elmknitter1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
ellen marshall
4d dennison drive
East Windsor, NJ 08520
elmknitter1@gmail.com

From: dawn ward (bklynpeachez@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
dawn ward
2813 roosevelt st
Wall Township, NJ 07719
bklynpeachez@aol.com

From: ryan applegate (cody.applegate@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
ryan applegate
2528 tilton rd 84
Egg Harbor Township, NJ 08234
cody.applegate@yahoo.com

From: samuel thompson (thompson35@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
samuel thompson
5 lincroft avenue
Old Bridge, NJ 08857
thompson35@aol.com

From: jackie prado (jacquiet69@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jackie prado
79 westview rd
Wayne, NJ 07470
jacquiet69@yahoo.com

From: linda roman (lindaroman192@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
linda roman
52 carroll ave
Williamstown, NJ 08094
lindaroman192@gmail.com

From: nicole horn (nicolel_1218@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
nicole horn
909 curtis drive
Pennsville, NJ 08070
nicolel_1218@yahoo.com

From: sheila goodis (sgoodis6@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
sheila goodis
7301 marshall avenue
Ventnor City, NJ 08406
sgoodis6@icloud.com

From: anita schellinger (anitaschellinger1260@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

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Yours sincerely,
anita schellinger
315 stites ave
Cape May Court House, NJ 08210
anitaschellinger1260@gmail.com

From: anthony bersito (ajbersito@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
anthony bersito
209 winding way rd
Stratford, NJ 08084
ajbersito@gmail.com

From: angelica pierre (lauraangelicapierre@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
angelica pierre
177 vinton circle
Fanwood, NJ 07023
lauraangelicapierre@gmail.com

From: tony albano (aal020692@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
tony albano
153 indiana ave
Blackwood, NJ 08012
aal020692@gmail.com

From: john lawrence (flick92858@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
john lawrence
117 pamphylia ave
Bridgeton, NJ 08302
flick92858@gmail.com

From: ashley moran (michellemoran2011@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
ashley moran
55 point pleasant ave
Marmora, NJ 08223
michellemoran2011@gmail.com

From: joycjoyce wiesemann (jjw50th@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
joycjoyce wiesemann
9 s main st
Barnegat, NJ 08005
jjw50th@gmail.com

From: frank rosen (frosenwork121@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
frank rosen
#10 kearny avenue, apt.#6a
Edison, NJ 08817
frosenwork121@gmail.com

From: lisa reynolds (lisareynolds0624@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
lisa reynolds
1304
Camden, NJ 08104
lisareynolds0624@gmail.com

From: guilletma quintana (guillerma42794@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
guilletma quintana
212franklin avenue
Nutley, NJ 07110
guillerma42794@gmail.com

From: cynthia matarazzo (cyn0642@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
cynthia matarazzo
14 oakdale rd
Jersey City, NJ 07305
cyn0642@gmail.com

From: adebayo olabisi (bayolabisi@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
adebayo olabisi
202 south stiles street apt. 2r
Linden, NJ 07036
bayolabisi@hotmail.com

From: wuandalin elsayed (jade1444@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
wuandalin elsayed
388 river drive
Garfield, NJ 07026
jade1444@gmail.com

From: junior gardner (christine.fourteau@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
junior gardner
592 sudbury ln, bridgewater, nj 088
Bridgewater, NJ 40245
christine.fourteau@gmail.com

From: rosemarie durant (artielover@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
rosemarie durant
889 westminster drive
Toms River, NJ 08753
artielover@icloud.com

From: maureen farrell (farrellm0730@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
maureen farrell
600 north drive
Wildwood, NJ 08260
farrellm0730@gmail.com

From: susan smithrooney (cocosmith116@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
susan smithrooney
100 muirfield rd
Jackson, NJ 08527
cocosmith116@gmail.com

From: tobyas washington (tobyas306@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tobyas washington
1827s s 4th st
Camden, NJ 08104
tobyas306@gmail.com

From: tom will (tpw07866@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tom will
71jacobsrd
Rockaway, NJ 07866
tpw07866@yahoo.com

From: romel madduma (rmadduma1@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
romel madduma
5 e woodland ave
Absecon, NJ 08201
rmadduma1@hotmail.com

From: rolando chan (rrchan@optonline.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
rolando chan
9 dogwood court
Cliffwood, NJ 07721
rrchan@optonline.net

From: hector watson (germ37660@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
hector watson
53 taylor st
Newark, NJ 07104
germ37660@gmail.com

From: audrey griffin (agriffin416@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
audrey griffin
14 fairview ave
Woodcliff Lake, NJ 07677
agriffin416@gmail.com

From: malvinder kaur (kaurmalvinder@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
malvinder kaur
992, mercer road
Princeton, NJ 08540
kaurmalvinder@yahoo.com

From: adeola akibu (o_akibu@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
adeola akibu
490 s 19th str
Newark, NJ 07103
o_akibu@yahoo.com

From: nieves carchi (carchialejandra@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
nieves carchi
39-05 garden view
East Windsor, NJ 08520
carchialejandra@gmail.com

From: kathryn hymer (waynecouchjr@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kathryn hymer
354 south broadway
Pennsville, NJ 08070
waynecouchjr@gmail.com

From: yolonda tyre (yolondatyre55@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
yolonda tyre
35 new heckman drive
Jersey City, NJ 07305
yolondatyre55@gmail.com

From: emily martinez (dioanddi2@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
emily martinez
104 linden ave
Bound Brook, NJ 08805
dioanddi2@yahoo.com

From: patricia wehrle (coastalpattie@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
patricia wehrle
5 franklin ave
Leonardo, NJ 07737
coastalpattie@comcast.net

From: stanley lumpkin (stanley4544@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
stanley lumpkin
108 pennington ave
Trenton, NJ 08618
stanley4544@gmail.com

From: melissa rivera (mellie_teeann@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
melissa rivera
612 s 8th street
Vineland, NJ 08360
mellie_teeann@yahoo.com

From: melwin valbuena (melwinvs2022@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
melwin valbuena
6109 hudson avenue
West New York, NJ 07093
melwinvs2022@gmail.com

From: tammy wheeler (skyzelara@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
tammy wheeler
880 franklin avenue
Newark, NJ 07107
skyzelara@gmail.com

From: michelle bachrach (wacjsecretary@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
michelle bachrach
23 lewis dr
Mays Landing, NJ 08330
wacjsecretary@gmail.com

From: jose ramirez (icloud.ramirez@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jose ramirez
2310 primrose ct
Mays Landing, NJ 08330
icloud.ramirez@icloud.com

From: debra williams (debbiewms56@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
debra williams
37 hopewell lane
Sicklerville, NJ 08081
debbiewms56@gmail.com

From: theodore sconions (sconionst@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
theodore sconions
94 union street
Jersey City, NJ 07304
sconionst@yahoo.com

From: maria gomez (mariteregomez@msn.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
maria gomez
173 canterbury court
East Windsor, NJ 08520
mariteregomez@msn.com

From: matthew davila (mfroggerboy619@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
matthew davila
45 river dr
Passaic, NJ 07055
mfroggerboy619@gmail.com

From: wallace gunning (skipgunning@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
wallace gunning
150 harvest rd
Swedesboro, NJ 08085
skipgunning@comcast.net

From: kevin bambrick (bam8190@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kevin bambrick
509 monroe st
Hoboken, NJ 07030
bam8190@gmail.com

From: tammy menard (tmenard2388@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
tammy menard
72 1/2 state street
Penns Grove, NJ 08069
tmenard2388@yahoo.com

From: joan malyar (whoago1@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
joan malyar
127 south stevens ave
South Amboy, NJ 08879
whoago1@yahoo.com

From: frank patterson (franksgoldwing@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
frank patterson
557 zoin rd egg harbor township
Egg Harbor Township, NJ 08234
franksgoldwing@gmail.com

From: norma forte (nj1forte@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
norma forte
309 whiton st
Jersey City, NJ 07304
nj1forte@yahoo.com

From: andre long (donblaq210tv@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
andre long
175 johnson ave
Lawrence Township, NJ 08648
donblaq210tv@gmail.com

From: catherine mccool (cathiemccool@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
catherine mccool
10b yorkshire dr
Monroe Township, NJ 08831
cathiemccool@gmail.com

From: mary whitaker (mskay5674@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
mary whitaker
1520 garfield ave pleasantville nj
Pleasantville, NJ 08232
mskay5674@gmail.com

From: deborah brier (dabb112954@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
deborah brier
1209 7th ave
Neptune, NJ 07753
dabb112954@gmail.com

From: jermaine harris (jrocc354@gmail.com)

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Yours sincerely,
jermaine harris
619 bright ct
Newark, NJ 07111
jrocc354@gmail.com

From: nancy coghlan (ntcgram@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
nancy coghlan
68 sheridan avenue
Waldwick, NJ 07463
ntcgram@yahoo.com

From: antoinette bartolomei (antoinettebar50@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
antoinette bartolomei
23 kirby ave
Trenton, NJ 08610
antoinettebar50@gmail.com

From: dianna barker (barkerd246@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
dianna barker
239 south shore dr
Toms River, NJ 08753
barkerd246@gmail.com

From: jeanne worrell (worrellj@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jeanne worrell
6 willoughby lane
Southampton, NJ 08088
worrellj@comcast.net

From: john wharton (johnwharton53@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
john wharton
1409 briarwood dr
Williamstown, NJ 08094
johnwharton53@hotmail.com

From: lionel labossiere (doctorlovebelize@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
lionel labossiere
200 hillside ave, metuchen, nj 0884
Metuchen, NJ 08840
doctorlovebelize@gmail.com

From: p stepney (porsha723@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
p stepney
68 warner ave
Springfield, NJ 07081
porsha723@aol.com

From: james jones (j.hummer.jones@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
james jones
206 grove st
Roselle, NJ 07203
j.hummer.jones@gmail.com

From: john fiore (fiorejohn396@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
john fiore
1028 cooper street
Beverly, NJ 08010
fiorejohn396@gmail.com

From: philip passantino (passantinojr@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
philip passantino
2 hazen ct 31a
Wayne, NJ 07470
passantinojr@yahoo.com

From: margaret williams (margaretw@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
margaret williams
712 broadway
Westville, NJ 08093
margaretw@gmail.com

From: carmine piccirillo (cmvpautosales@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
carmine piccirillo
104 cedar row
Toms River, NJ 08753
cmvpautosales@gmail.com

From: nicholas lucona (nicluc2043@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
nicholas lucona
301market st camden
Camden, NJ 08102
nicluc2043@gmail.com

From: larry zimmer (zimmerl850@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
larry zimmer
54 w stewart st.
Washington, NJ 07882
zimmerl850@gmail.com

From: leroy pinckney (leroyp3224@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
leroy pinckney
545 park ave
East Orange, NJ 07017
leroyp3224@gmail.com

From: charles banks (bankscharlesshakir7@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
charles banks
31 early st apt
Morristown, NJ 07960
bankscharlesshakir7@gmail.com

From: maria romito (mariarrdh@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
maria romito
36 manor drive
Hillsborough, NJ 08844
mariarrdh@gmail.com

From: janet richards (richjanetionie@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
janet richards
153 park street
East Orange, NJ 07017
richjanetionie@yahoo.com

From: jay king (jay523849@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jay king
43 maple drive
Bridgeton, NJ 08302
jay523849@gmail.com

From: candala roslan (canderoslan@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
candala roslan
924west walnut dr
Newton, NJ 07860
canderoslan@icloud.com

From: marieketty paul (paulmarieketty38@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
marieketty paul
25maple avenue
Irvington, NJ 07111
paulmarieketty38@gmail.com

From: robert mejias (spanishpirate2828@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
robert mejias
918 e.clements bridge.rd.
Runnemede, NJ 08078
spanishpirate2828@gmail.com

From: kasandra cormier (austinfenceanddeck@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
kasandra cormier
17 von steuben ln, south bound broo
South Bound Brook, NJ 08880
austinfenceanddeck@gmail.com

From: zinaida wydra (wydranj@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
zinaida wydra
pobox144
Elizabeth, NJ 07207
wydranj@gmail.com

From: himansu desai (hitudesai@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
himansu desai
689 f
Hillsborough, NJ 08844
hitudesai@hotmail.com

From: patrick reed (preed23@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
patrick reed
608 cricket ln.
Woodbridge, NJ 07095
preed23@gmail.com

From: stewart zemsky (l7933@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
stewart zemsky
31 regal drive
Colonia, NJ 07067
l7933@aol.com

From: lillian gratacos (lgratacos77@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
lillian gratacos
15 cheatue is thierry ave apt 409
Madison, NJ 07940
lgratacos77@gmail.com

From: kris giamboi (kaileadsllc@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
kris giamboi
47 e connecticut concourse
Jackson, NJ 08527
kaileadsllc@hotmail.com

From: kim nuruddin (nkimyania@ymail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kim nuruddin
158 south harrison street
East Orange, NJ 07018
nkimyania@ymail.com

From: bill bouffard (bouffard1949@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
bill bouffard
104 cotswold circle
Ocean, NJ 07712
bouffard1949@gmail.com

From: daniel richardson (drichardson3491@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
daniel richardson
51 freddie ave
Avenel, NJ 07001
drichardson3491@gmail.com

From: steven chrobock (doublehugg@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
steven chrobock
5558b berkshire valley road
Oak Ridge, NJ 07438
doublehugg@yahoo.com

From: gwendolyn owens (gwendolyno1947@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
gwendolyn owens
26 w. hanover place
Trenton, NJ 08608
gwendolyno1947@gmail.com

From: charlie zitomer (charliezitomer@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
charlie zitomer
151 thornhill rd
Cherry Hill, NJ 08003
charliezitomer@gmail.com

From: barbara sweigart (babs53@att.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
barbara sweigart
226 garden drive
South Plainfield, NJ 07080
babs53@att.net

From: kyong kwon (come2korea@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kyong kwon
430 cedar ln #201
River Vale, NJ 07675
come2korea@gmail.com

From: teresa williams (bluebird93055@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
teresa williams
247 jericho rd.
Bridgeton, NJ 08302
bluebird93055@aol.com

From: linda mcguire (linda.mcguire88@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
linda mcguire
24 veeder ln
Bayville, NJ 08721
linda.mcguire88@gmail.com

From: michael hutchins (lashonawatkins6202@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
michael hutchins
752 trumbull ave
Lawrence Township, NJ 08648
lashonawatkins6202@gmail.com

From: melissa scott (mscott4865@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
melissa scott
17walnutstreet
Toms River, NJ 08753
mscott4865@gmail.com

From: wanda garcia (wandag1262@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
wanda garcia
227 william street
Belleville, NJ 07109
wandag1262@gmail.com

From: randall wagner (randall.wagner1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
randall wagner
6 bear branch road
Trenton, NJ 08610
randall.wagner1@gmail.com

From: kristina davis (kristinadavis485@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kristina davis
716 hulses corner rd
Howell, NJ 07731
kristinadavis485@gmail.com

From: ingrid salazar (i.salazar1@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
ingrid salazar
119 essex st
Hackensack, NJ 07601
i.salazar1@yahoo.com

From: desmond bryant (d_bryant24@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
desmond bryant
22 fallsington place
Chesterfield, NJ 08515
d_bryant24@hotmail.com

From: kyle morais (kylemorais35@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kyle morais
176 johnson pl
South River, NJ 08882
kylemorais35@gmail.com

From: lizbeth martinez (lizbeth.martinez2002@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
lizbeth martinez
14 north georgia ave apt d rear
Atlantic City, NJ 08401
lizbeth.martinez2002@icloud.com

From: angelo gonzalez (angeloj30@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
angelo gonzalez
808 dock
Millville, NJ 08332
angeloj30@gmail.com

From: samira andelmessih (samira.abdelmessih@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
samira andelmessih
700 newark ave appt#805
Jersey City, NJ 07306
samira.abdelmessih@gmail.com

From: sailaja koppuravuri (achanta.satyavathi@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sailaja koppuravuri
9 maida rd
Edison, NJ 08820
achanta.satyavathi@gmail.com

From: doris robinson (msdjr191@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
doris robinson
191 south hill dr
Westampton, NJ 08060
msdjr191@aol.com

From: william brown (willbro58@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
william brown
126 park ave
Paterson, NJ 07501
willbro58@hotmail.com

From: bea samol (beatricesamol9@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
bea samol
3705 graham ct
Bridgewater, NJ 08807
beatricesamol9@gmail.com

From: patrickryan zamora (thewerks0ne@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
patrickryan zamora
288 n haledon ave
North Haledon, NJ 07508
thewerks0ne@gmail.com

From: mary baglivi (proud@optomline.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
mary baglivi
74 windsor rd
Oradell, NJ 07649
proud@optomline.net

From: puneet bhatia (puneetkb1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
puneet bhatia
27 laurel ave
Old Bridge, NJ 08857
puneetkb1@gmail.com

From: jason park (jpark22691@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
jason park
33 oak st. apt 4
Hackensack, NJ 07601
jpark22691@gmail.com

From: justin alpaslan (justin.alpaslan@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
justin alpaslan
89 n post rd
Princeton Junction, NJ 08550
justin.alpaslan@gmail.com

From: florence evans (fse33@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
florence evans
41 stow creek road
Bridgeton, NJ 08302
fse33@yahoo.com

From: robert glavotsky (glavotsky@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
robert glavotsky
17 gerard. dr.
Waldwick, NJ 07463
glavotsky@gmail.com

From: sharon koponosh (charmin18215@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sharon koponosh
129 irvington ave.
Trenton, NJ 08620
charmin18215@aol.com

From: chris guerrero (guerrerojack4@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
chris guerrero
728 elm ave
River Edge, NJ 07661
guerrerojack4@gmail.com

From: dennis freeman (jordanafreeman21@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
dennis freeman
28 inverness drive
Marlboro, NJ 07746
jordanafreeman21@gmail.com

From: robert strama (stramamainstgarage@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
robert strama
34 north main st
New Egypt, NJ 08533
stramamainstgarage@aol.com

From: anthony holden (unique277111@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
anthony holden
85 prince st
Newark, NJ 07103
unique277111@gmail.com

From: elijah crawford (elijah_crawford@live.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
elijah crawford
318 e state rt 4
Paramus, NJ 07652
elijah_crawford@live.com

From: tracie bonneau (raehardy48@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tracie bonneau
320 south harrison st.
East Orange, NJ 07018
raehardy48@gmail.com

From: emelia kpinpuo (emelia.kpinpuo@lc.cuny.edu)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
emelia kpinpuo
283 roanoke street
Woodbridge, NJ 07095
emelia.kpinpuo@lc.cuny.edu

From: jamie palm (jamiexox91@aim.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

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Yours sincerely,
jamie palm
17 wyndham rd
Voorhees, NJ 08043
jamiexox91@aim.com

From: anderson anderson (ata1663@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
anderson anderson
9082683188
Union, NJ 07083
ata1663@yahoo.com

From: nancy rokos (wineee@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
nancy rokos
423 garden state dr.
Cherry Hill, NJ 08002
wineee@yahoo.com

From: kevin mcdonough (kevin.mcdonough22@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
kevin mcdonough
507 lydia ln
Wyckoff, NJ 07481
kevin.mcdonough22@gmail.com

From: kevin mahoney (pajamaman83@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kevin mahoney
85 shore ave
Manahawkin, NJ 08050
pajamaman83@gmail.com

From: patrisia moubayed (patrisianab@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
patrisia moubayed
317 mt pleasant ave
Woodland Park, NJ 07424
patrisianab@gmail.com

From: marilyn tomasso (marilyntomasso64@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
marilyn tomasso
456b portsmouth drive
Lakewood, NJ 08701
marilyntomasso64@gmail.com

From: boris khvan (khvanboris53@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
boris khvan
72 montgomery st
Jersey City, NJ 07302
khvanboris53@gmail.com

From: joe butschky (joebutschky41@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
joe butschky
119 irene ave
Buena, NJ 08310
joebutschky41@aol.com

From: j w (zxw9876@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
j w
3 beechwood dr
Wayne, NJ 07470
zxw9876@gmail.com

From: jennifer price (jennyprice1128@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jennifer price
5 forest hills dr
Medford, NJ 08055
jennyprice1128@gmail.com

From: judith danson (judithdanson@msn.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
judith danson
2 stone mill drive
Pittstown, NJ 08867
judithdanson@msn.com

From: diane andersen (deeandico23@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
diane andersen
21 maidstone pl
Southampton, NJ 08088
deeandico23@gmail.com

From: brian young (briany473@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
brian young
100 atkins ave.
Asbury Park, NJ 07712
briany473@gmail.com

From: shahuna fowler (shahunafowler@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
shahuna fowler
999 hidden lake drive
North Brunswick, NJ 08902
shahunafowler@yahoo.com

From: edna long (ednaivy@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
edna long
30 earnshaw lane
Willingboro, NJ 08046
ednaivy@comcast.net

From: diane pernie (dcpernie@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
diane pernie
537 cascade ct
Sewell, NJ 08080
dcpernie@yahoo.com

From: julio riquelme (juliogold95@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
julio riquelme
1046 louisa street
Elizabeth, NJ 07201
juliogold95@yahoo.com

From: frank rodriguez jr (franciscorodz1980@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
frank rodriguez jr
840 washington av
Linden, NJ 07036
franciscorodz1980@gmail.com

From: john dimicco (johndimicco@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
john dimicco
43 clement st
Nutley, NJ 07110
johndimicco@yahoo.com

From: jonathan rodriguez (balty22_2010@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
jonathan rodriguez
1109 53rd st
North Bergen, NJ 07047
balty22_2010@hotmail.com

From: sam yoon (sy.samyoon@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sam yoon
116 irving pl
Rutherford, NJ 07070
sy.samyoon@gmail.com

From: valerie laws (valerielaws636@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
valerie laws
210 6th ave.
Newark, NJ 07017
valerielaws636@gmail.com

From: gloria crews (gcrewsp@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
gloria crews
23 north warwick rd
Lawnside, NJ 08045
gcrewsp@gmail.com

From: anthony felcon (tfelcon64@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
anthony felcon
50 s. sunset rd.
Willingboro, NJ 08046
tfelcon64@gmail.com

From: andrew buchko (andrewbuchko612@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
andrew buchko
133 garden terrace
Edison, NJ 08817
andrewbuchko612@gmail.com

From: brittany banks (banksbrittany79@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
brittany banks
14 berekley terr
Plainfield, NJ 07062
banksbrittany79@yahoo.com

From: harriet cook (hcook1122@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
harriet cook
31 delta dr
Ocean, NJ 07712
hcook1122@aol.com

From: felix mendoza (yankeeplayer23@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
felix mendoza
269 east crescent av
Mahwah, NJ 07430
yankeeplayer23@hotmail.com

From: claudette mayers (cldttmayers@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
claudette mayers
9d ari drive
Somerset, NJ 08873
cldttmayers@hotmail.com

From: james yang (diddmsrb7890@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
james yang
112 forest glen dr
Highland Park, NJ 08904
diddmsrb7890@gmail.com

From: renee mason (neelynnmason@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
renee mason
288 delsea dr
Sewell, NJ 08080
neelynnmason@hotmail.com

From: deborah fisher (butter3692002@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
deborah fisher
butter3692002@yahoo.com
National Park, NJ 08063
butter3692002@yahoo.com

From: laura starr (lstarr81.ls@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
laura starr
108 south broad st. apt 215
Woodbury, NJ 08096
lstarr81.ls@gmail.com

From: gina macan (rmacan13@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
gina macan
392 kettle creek road
Toms River, NJ 08753
rmacan13@aol.com

From: daniel beup (my.duude@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
daniel beup
132 berthold ave
Rahway, NJ 07065
my.duude@gmail.com

From: farod robinson (farod45@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
farod robinson
32 grant ave
Jersey City, NJ 07305
farod45@gmail.com

From: magalis balanquet (mbalanquet@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

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Yours sincerely,
magalis balanquet
25 manor drive
Newark, NJ 07106
mbalanquet@yahoo.com

From: barbara crone (barbaracrone1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

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Yours sincerely,
barbara crone
142 forest dr
Piscataway, NJ 08854
barbaracrone1@gmail.com

From: claudia pusar (claudiapusar0@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
claudia pusar
100 franklin turnpike
Waldwick, NJ 07463
claudiapusar0@gmail.com

From: jennifer mcneil (jenmcneil1@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jennifer mcneil
10 st.ark ct
Ringoes, NJ 08551
jenmcneil1@comcast.net

From: elijah reed (elijahreed900@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
elijah reed
52 new heckman dr
Jersey City, NJ 07305
elijahreed900@gmail.com

From: andrew parris (andrewparris1021@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
andrew parris
52 highbridge blvd
Medford, NJ 08055
andrewparris1021@icloud.com

From: shiyang li (lishiy99@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
shiyang li
270 10th st. apt. 312
Jersey City, NJ 07302
lishiy99@gmail.com

From: regina stewart (ginny2911@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
regina stewart
2538 tremont ave trlr 84
Egg Harbor Township, NJ 08234
ginny2911@yahoo.com

From: anthony taylor (trigger4959@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
anthony taylor
67 old new brunswick rd
Piscataway, NJ 08854
trigger4959@gmail.com

From: chelses pohlman (chelspohl@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
chelses pohlman
69 pebble beach drive
Egg Harbor Township, NJ 08234
chelspohl@gmail.com

From: trever huel (treverhue@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
trever huel
58-28 gladstone ave,
Newark, NJ 07106
treverhue@gmail.com

From: lisa fenimore (fenimorewolf@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
lisa fenimore
208 madison ave
Lumberton, NJ 08048
fenimorewolf@aol.com

From: kristina patton (kristinapatton258@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
kristina patton
220 s burnett st 3rd fl
East Orange, NJ 07018
kristinapatton258@gmail.com

From: blanca rosario (blankis7715@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
blanca rosario
18 e. price st.
Linden, NJ 07036
blankis7715@gmail.com

From: holly mitchell (holli4rmnj@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
holly mitchell
490 rena ct
Brick, NJ 08724
holli4rmnj@gmail.com

From: amtul noor (amtulnoor2010@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
amtul noor
550 sunhaven dr
Clayton, NJ 08312
amtulnoor2010@hotmail.com

From: oscar merino (osk_r_19@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
oscar merino
221 n main st a
Wharton, NJ 07885
osk_r_19@hotmail.com

From: gizelle carreira (gizellecarreira@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
gizelle carreira
620 bloomfield ave
Bloomfield, NJ 07003
gizellecarreira@gmail.com

From: antjuan bruce (hoose458@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
antjuan bruce
123north11thstreet
Newark, NJ 07107
hoose458@gmail.com

From: cheryl roppatte (cherylroppatte1950@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
cheryl roppatte
161 lincoln ave aptb08
Newark, NJ 07104
cherylroppatte1950@gmail.com

From: gayle shinn (gayle3852@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
gayle shinn
23 holly rd
West Creek, NJ 08092
gayle3852@aol.com

From: sherwood stehr (number1waste@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sherwood stehr
855 new durham rd
Edison, NJ 08817
number1waste@gmail.com

From: joe hardy (joehard1944@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
joe hardy
30 belle ave
Paterson, NJ 07522
joehard1944@gmail.com

From: malcolm masa (malcolmmasai@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

Dear David Fish,

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Yours sincerely,
malcolm masa
140 prospect ave. apt 6a
Hackensack, NJ 07601
malcolmmasai@yahoo.com

From: dolores ayala (deelicious930@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
dolores ayala
225 lorillard ave
Union Beach, NJ 07735
deelicious930@yahoo.com

From: edward cenneno (edwardpcenneno38@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
edward cenneno
50 ginger drive
Lumberton, NJ 08048
edwardpcenneno38@gmail.com

From: angela grandberry (m81888@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
angela grandberry
255 dorsa avenue
Wayne, NJ 07470
m81888@yahoo.com

From: murray adams (murray66_adams@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors. We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm & further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement. Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
murray adams
34 chelsea ave
East Orange, NJ 07018
murray66_adams@yahoo.com

From: john scott (josjoh57@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
john scott
812 cumberland blvd
Toms River, NJ 08757
josjoh57@gmail.com

From: jeanne miller (jfm47@msn.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jeanne miller
10 chesterfield court
Southampton, NJ 08088
jfm47@msn.com

From: rene duckrey (rduckrey1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
rene duckrey
500 lampart ave apt 320
Sicklerville, NJ 08081
rduckrey1@gmail.com

From: grace woo (pgwoo@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
grace woo
247 lloyd rd
Matawan, NJ 07747
pgwoo@yahoo.com

From: jose padron (thsjosepadron@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jose padron
70 ann st.# 2
Newark, NJ 07105
thsjosepadron@gmail.com

From: tiffany chan (tiffany.yy.chan@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tiffany chan
321 willow ave. apt 5
Hoboken, NJ 07030
tiffany.yy.chan@gmail.com

From: joni skalanorris (jskala19@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
joni skalanorris
2272 polk ave
North Brunswick, NJ 08902
jskala19@gmail.com

From: john lipiec (headhunter52@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
john lipiec
38 brainerd street
Mount Holly, NJ 08060
headhunter52@comcast.net

From: julia santos (juliarodrigueslog@outlook.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
julia santos
27 park place apt 17
Bloomfield, NJ 07003
juliarodrigueslog@outlook.com

From: joseph marshello (jmarshello@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
joseph marshello
1017simpsonave
Ocean City, NJ 08226
jmarshello@comcast.net

From: thelma earle (brownsuga050@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
thelma earle
182 north arlington ave
East Orange, NJ 07017
brownsuga050@gmail.com

From: sue palumbo (suepalumbo37@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
sue palumbo
100 brunswick ave
Spotswood, NJ 08816
suepalumbo37@gmail.com

From: jacqueline rivera (jackie200962@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
jacqueline rivera
1184fulton st
Rahway, NJ 07065
jackie200962@gmail.com

From: john jackson (johnjackson1723@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
john jackson
341-east 28th st
Paterson, NJ 07514
johnjackson1723@gmail.com

From: eileen hansen (danepaint@comcast.net)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
eileen hansen
76 grove st
Bloomfield, NJ 07003
danepaint@comcast.net

From: shayla steele (shayla.steele1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
shayla steele
243 princeton ave
Pemberton, NJ 08068
shayla.steele1@gmail.com

From: noelle frye (nbooye418@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
noelle frye
176 tryens dr
Mays Landing, NJ 08330
nbooye418@gmail.com

From: daniel smith (dansmith020147@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
daniel smith
281 union ave
New Providence, NJ 07974
dansmith020147@gmail.com

From: joan shanley (joanieshanley@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
joan shanley
4 winfield drive
Parsippany, NJ 07054
joanieshanley@gmail.com

From: denise falks (dfalks936@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
denise falks
14 calumbia valley road
Andover, NJ 07821
dfalks936@gmail.com

From: jim lex (lexjim518@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
jim lex
832 browning pl
Mount Laurel, NJ 08054
lexjim518@gmail.com

From: nancy blackwood (hmmfmwywiyl@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
nancy blackwood
17 reservoir rd
Stewartsville, NJ 08886
hmmfmwywiyl@yahoo.com

From: renae hodges (renaehodges27@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
renae hodges
615s.clinton
Trenton, NJ 08611
renaehodges27@gmail.com

From: dinesh sharma (dhanjishanker49@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
dinesh sharma
5, sylvan way.
Short Hills, NJ 07078
dhanjishanker49@gmail.com

From: mayelin yangel (tessely12@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
mayelin yangel
257 hoover ave
Bloomfield, NJ 07003
tessely12@gmail.com

From: james gruters (jimevett@aol.com)

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Yours sincerely,
james gruters
221 thousand oaks dr
Atlantic Highlands, NJ 07716
jimevett@aol.com

From: dori letke (doriletke@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
dori letke
533shermanave
Belford, NJ 07718
doriletke@gmail.com

From: edna stewart (stewarel50@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
edna stewart
69 oak st
Carteret, NJ 07008
stewarel50@gmail.com

From: elaine stewart (tusayelaine@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
elaine stewart
2240 whitehorse mercerville rd
Trenton, NJ 08619
tusayelaine@gmail.com

From: jennifer dyson (swojo4780@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
jennifer dyson
1 division street
Port Monmouth, NJ 07758
swojo4780@aol.com

From: heonju pyun (heonjubyun@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
heonju pyun
15 hunt walk apt g
Bergenfield, NJ 07621
heonjubyun@hotmail.com

From: agustin lopez jr (poalopezjr@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
agustin lopez jr
300 lincoln st
Linden, NJ 07036
poalopezjr@gmail.com

From: joanne vaughan (shelbi2019@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
joanne vaughan
25 center st
Elmer, NJ 08318
shelbi2019@gmail.com

From: alexandra estevez (asapreo@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
alexandra estevez
westfield nj
Westfield, NJ 07104
asapreo@gmail.com

From: denise benoit (denisebenoit22@aol.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
denise benoit
17 college drive
Jersey City, NJ 07305
denisebenoit22@aol.com

From: vickie gracey (deldocv65@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
vickie gracey
210 saint marys drive
Cherry Hill, NJ 08003
deldocv65@gmail.com

From: john bodine (john.bodine@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
john bodine
1125 barnacle dr
Manahawkin, NJ 08050
john.bodine@gmail.com

From: cecilia passley (ccl_mthws@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
cecilia passley
72 hobart avenue
Trenton, NJ 08629
ccl_mthws@yahoo.com

From: caroline marchiano (ducky033031@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
caroline marchiano
213 8th avenue
Hammonton, NJ 08037
ducky033031@yahoo.com

From: stephanie whitworth (whitworthstephanie8@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
stephanie whitworth
1426 w main st
Millville, NJ 08332
whitworthstephanie8@gmail.com

From: patrice satterfield (tritri56@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
patrice satterfield
820 partridge run
Point Pleasant Beach, NJ 08742
tritri56@gmail.com

From: tomasz gawel (tomren3@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tomasz gawel
572beechave
Saddle Brook, NJ 07663
tomren3@yahoo.com

From: nancy archer (nancyarcher64@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
nancy archer
156 syringa st
Browns Mills, NJ 08015
nancyarcher64@yahoo.com

From: theresa braswell (theresabraswell@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
theresa braswell
25 elm rd
Millville, NJ 08332
theresabraswell@gmail.com

From: jeanie haas (kayaker20@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
jeanie haas
14101 goodrow ct.
Princeton, NJ 08540
kayaker20@gmail.com

From: linda saez (ellensaez@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
linda saez
25 meadow lane
Bloomfield, NJ 07003
ellensaez@yahoo.com

From: tieasha lewis (tieasha717@icloud.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
tieasha lewis
802 grove st
Irvington, NJ 07111
tieasha717@icloud.com

From: donald wilson (braedongeorge@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
donald wilson
202 old mill
Cape May, NJ 08204
braedongeorge@gmail.com

From: edna rizzo (jcfednarizzo@hotmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
edna rizzo
401 dercole ct
Norwood, NJ 07648
jcfednarizzo@hotmail.com

From: mona samy (maryolla@yahoo.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
mona samy
160 w 32nd st
Bayonne, NJ 07002
maryolla@yahoo.com

From: boysie beepat (boysiebeepat1946@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
boysie beepat
32union street
Burlington, NJ 08016
boysiebeepat1946@gmail.com

From: daniel ventura (dcvmax1@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

SUBJECT LINE: Public comment on PRN 2025-051: Please reject the proposed rule

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Yours sincerely,
daniel ventura
409 front street
Dunellen, NJ 08812
dcvmax1@gmail.com

From: sheslia downey (shealia461@gmail.com)

To: David Fish (David.Fish@dol.nj.gov)

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Yours sincerely,
sheslia downey
7634 joseph st
Millville, NJ 08332
shealia461@gmail.com

From:	Nick Wertsch
To:	Fish, David [DOL]
Cc:	Alix Gould-Werth
Subject:	[EXTERNAL] Dēmos comment submission re: Proposed New Rules Regarding Independent Contractors
Date:	Thursday, July 3, 2025 12:24:15 PM
Attachments:	Outlook-Picture.png Demos - Comment on NJDOL Rule for Independent Contractor ABC Test- 7.3.25.pdf

---

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Dear Director Fish,

Please find attached a comment from Dēmos regarding the New Jersey DOL's newly proposed ABC test for independent contractors.

Best,

Nick

Nick Wertsch
Associate Director, Workplace Justice
Demos | Pronouns: he/him
C: (314) 662-2730 | E: nwertsch@demos.org

July 3, 2025

Mr. David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Via email to: david.fish@dol.nj.gov

Re: *Proposed New Rules Regarding Independent Contractors: N.J.A.C. 12:11* - ***Support***
57 N.J.R. 894(a), Vol. 9 (May 5, 2025)

Dear Director Fish:

As an organization dedicated to a just and inclusive economy, Dēmos supports the New Jersey Department of Workforce Development's proposed regulation codifying its interpretation of the state's long-standing "ABC test," as it will help deter employee misclassification.

Dēmos is a non-profit public policy organization that works alongside national, state-based, and grassroots partners to build a just, inclusive, multiracial democracy and economy. Through our collaborations with our partners on the ground, we have witnessed the disastrous impact of misclassification on working families in Black and brown communities.

The Problem of Misclassification

To appreciate the urgency of this problem, it is helpful to understand the scale and scope of the issue. The IRS estimated in 1984 that 3.4 million workers were misclassified, resulting in a revenue loss of $1.6 billion in that year.[1] The Government Accountability Office estimated in 2006 that misclassification cost federal revenues $2.72 billion.[2] The number of workers in industries with significant misclassification problems has only increased in the last two decades, and those prior estimates likely undercount the overall total of misclassified employees.[3]

Within the construction industry alone, it is conservatively estimated that between 1.1 million and 2.1 million construction workers are misclassified or paid off-the-books.[4] When employers misclassify

[1] Government Accountability Office, "EMPLOYEE MISCLASSIFICATION Improved Coordination, Outreach, and Targeting Could Better Ensure Detection and Prevention," August 2009, https://www.gao.gov/assets/gao-09-717.pdf.
[2] *Id*.
[3] National Employment Law Project, "Independent Contractor Misclassification Imposes Huge Costs on Workers and Federal and State Treasuries," October 26, 2020, https://www.nelp.org/insights-research/independent-contractor-misclassification-imposes-huge-costs-workers-federal-state-treasuries-update-october-2020/.
[4] Laura Valle Gutierrez, et al., "Up to 2.1 Million U.S. Construction Workers Are Illegally Misclassified or Paid Off the Books," *The Century Foundation*, November 12, 2023, https://tcf.org/content/report/up-to-2-1-million-u-s-construction-workers-are-illegally-misclassified-or-paid-off-the-books/.

workers or pay them off the books, those workers lose critical legal protections. They miss out on essential benefits like workers' compensation, unemployment insurance, and overtime pay. Black and brown workers are disproportionately represented in industries with high rates of misclassification, such as the gig economy and construction work, which leads to those workers' exclusion from minimum wage laws and workplace protections.[5] Low-wage workers of color and immigrant workers are frequently trapped in a separate and unequal economy built on misclassification where they are overworked, underpaid, and left to fend for themselves. In short, misclassification is an issue of racial justice.

Misclassification also carries broader costs for our communities and our public services. State and federal social insurance programs rely on employer tax contributions for funding. By avoiding those payments, workers are forced to pay their employer's share of payroll taxes, and employers shift the burden to taxpayers. It is estimated that in the construction industry alone, employers who misclassify workers or use off-the-books payments underpay more than $12 billion annually in wages and legally required benefits for their workers, including Social Security, UI, and workers' compensation insurance. This costs taxpayers between $5 and $10 billion each year.[6]

While our partner organizations are not primarily based in New Jersey, their experiences in other states provide an important point of comparison that underscores the value of this proposed rule for protecting vulnerable workers in New Jersey.

In Texas, for example, a 2024 survey study of more than 350 construction workers documents the pervasiveness of misclassification and its negative impacts not only for workers but the broader community as well.[7] Survey participants were screened to only include workers who do not own their own construction company. Survey responses suggest that a significant number of construction companies in Texas may be committing payroll fraud. Nearly one in five workers (18%) said they receive a 1099 form, typically used for independent contractors. Another 10% reported receiving no tax documents at all. Given that none of the survey respondents owned their construction company, it is unlikely that even most of the workers who received a 1099 form or no tax document at all are truly operating as independent contractors instead of as employees.

Additionally, over one in five (22%) are paid off-the-books using cash, mobile payment apps, prepaid debit cards, or personal checks. Employees should receive W-2 forms with taxes withheld from their pay. The different payment methods reported by respondents raise concerns about industry pay practices and closely parallels common methods for employers committing wage theft.

Within the construction industry, New Jersey has one of the highest rates of estimated wage theft and underpayment due to misclassification. A 2025 assessment found that a misclassified construction worker

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[5] Jennifer Sherer and Margaret Poydock, "Flexible work without exploitation," *Economic Policy Institute*, February 23, 2023, https://www.epi.org/publication/state-misclassification-of-workers/; NELP, "Independent Contractor Misclassification."
[6] Laura Valle Gutierrez, et al.
[7] Nik Theodore, "Behind the Texas Miracle: The Unstable Foundation of the Texas Industry," *Workers Defense Project*, March 2023, https://workersdefense.org/wp-content/uploads/2025/03/Final-Behind-The-Texas-Miracle.pdf.

in New Jersey is underpaid by $13,808 to $22,442.[8] It is estimated that, on average, more than 18% of New Jersey construction workers (49,294 workers), allowing low-road employers to avoid more than $531.3 million in costs and costing taxpayers $329.3 million each year.[9]

With this understanding of the national problem of misclassification and its deeper impacts within states and industries, it is important to consider the potential solutions – and New Jersey's proposed regulation would provide much needed clarity for workers, businesses, and courts to accurately classify workers and hold low-road employers accountable.

New Jersey's Proposed "ABC test" Provides Clarity and Enforceability

The Department recognizes that New Jersey's "ABC test" is not new. Its meaning has already been interpreted by the state's highest court.[10] Creating a rule that explains how the three-part test works will make the standard clearer. It will help people who do not have access to lawyers or accountants. It will also ensure that all affected stakeholders can understand and apply the test correctly:

- **Prong A** of the proposed rule focuses on whether a worker is, and will remain, free from control or direction in how they perform their work. It considers both the actual working conditions and whether the employer has retained the right to control the worker's performance. This matters because genuine independent contractors operate their own businesses. They are not controlled by the client or company that hires them. Instead, they decide how and when to do their work and have the ability to negotiate terms they believe will help their business grow.
- **Prong B** of New Jersey's law offers flexibility. An employer can meet the standard if the worker's service is either outside the usual course of the employer's business or performed entirely off-site. This prong helps prevent unchecked outsourcing by recognizing that workers doing the same tasks a business sells are likely employees. It limits the ability of companies to label core workers as "independent contractors" running separate businesses.
- **Prong C** examines whether a worker is genuinely operating an independent, ongoing business. The proposed rule outlines factors that help differentiate real businesses from those that exist in name only. To satisfy this prong, the business must be able to exist "independent of, and apart from, the particular service relationship with the putative employer; that is, the enterprise must be "stable and lasting."" 57 N.J.R. 894(a), Vol. 9 (May 5, 2025).

By providing clearer and simpler standards for assessing whether a worker should be classified as an employee or an independent contractor, the proposed rule will make it easier for workers to know their legal rights on the job and for companies to understand their obligations to their workforce.

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[8] Adewale A. Maye, Daniel Perez, and Margaret Poydock, "Misclassifying workers as independent contractors is costly for workers and states," *Economic Policy Institute*, January 22, 2025, https://www.epi.org/publication/misclassifying-workers-2025-update/.

[9] Laura Valle Gutierrez, et al.

[10] The statute has been in effect since at least 1942. Electrolux Corp. v. Bd. of Rev. (Unemployment Comp. Comm'n), 129 N.J.L. 157 (1942). Its contours have been examined by the New Jersey Supreme Court, and the Department relies heavily on two such cases. Carpet Remnant Warehouse, Inc. v. New Jersey Dep't of Lab., 125 N.J. 567 (1991); E. Bay Drywall, LLC v. Dep't of Lab. & Workforce Dev., 251 N.J. 477 (2022).

The Proposed Rule Accounts for Power Imbalances Between Workers and Employers

The proposed rule also establishes important safeguards to prevent employers from using paperwork as a cover to misclassify workers. It offers protection for workers who lack the knowledge or leverage to refuse an "independent contractor" label when they are, in fact, employees.

The Department's approach ensures that simply issuing a Federal IRS Form 1099 does not make a worker an independent contractor. Similarly, labeling someone an "independent contractor" in a contract does not automatically satisfy the ABC test. Given the power imbalance between employers and individual workers, many workers accept contract terms out of economic necessity—to afford rent or put food on the table. That's why it's essential to look beyond the contract itself and consider: (a) who primarily drafted it; (b) whether it was negotiated or a take-it-or-leave-it agreement; (c) whether the employer can change its terms unilaterally; and (d) whether either party can end the relationship at any point during the agreement.

We appreciate the Department's leadership on this issue, and we support the proposed rule because it will provide greater clarity and consistency in protecting Black and brown workers, as well as our communities and public services, from the serious harms of misclassification.

Sincerely,

Nick Wertsch

Associate Director, Workplace Justice
Dēmos
740 6th Street NW, 2nd Floor
Washington DC 20001
nwertsch@demos.org

From: Patti Soldavini
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 3, 2025 7:15:33 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Patti Soldavini
941 Rockport rd
Hackettstown, NJ 07840
p.soldavini@comcast.net

From: Helen Lawler
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 3, 2025 7:40:34 PM

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Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Helen Lawler
69 dorchester
Basking Ridge, NJ 07920
Murfhw@aol.com

From:	William Rivers
To:	Fish, David [DOL]
Subject:	[EXTERNAL] NJ DOL ABC rule Letter from the Association of Language Companies
Date:	Thursday, July 3, 2025 9:03:48 PM
Attachments:	NJ DOL ABC rule Letter from the Association of Language Companies.pdf

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Dear Mr. Fish,

Please find attached comments from the Association of Language Companies, on the proposed rule for the ABC Test for Independent Contractors in New Jersey.

respectfully Submitted,

Dr. Bill Rivers
Advocacy and Governmental Affairs Consultant
Association of Language Companies

ASSOCIATION OF LANGUAGE COMPANIES

July 3, 2025
BY EMAIL: david.fish@dol.nj.gov
Mr. David Fish
Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
PO Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Re: ABC Test; Independent Contractors Proposed New Rules:
N.J.A.C. 12:11
Proposal Number: PRN 2025-051

Dear Mr. Fish:

The Association of Language Companies (ALC) welcomes the opportunity to submit comments on the proposed rule to amend the State of New Jersey's ABC test for worker classification. The ALC represents the US Language Industry, with more than 180 Language Services Companies, including several with headquarters or offices in New Jersey. The language industry provides essential language access to healthcare providers, schools, municipalities, and the legal system, 24/7/365 and in more than 350 spoken and signed languages. New Jersey is one of the most linguistically diverse states in the US, with more than 125 languages reported by the US Census in the most recent data from the 2023 American Community Survey, and more than 1.1 million residents – approximately 12% of the population of New Jersey, reported as Limited English Proficient. Additionally, at least 850,000 residents have some degree of hearing loss. Language and communications access is required under Lau v Nichols (414 U.S. 563, 1974), several other federal statues and regulations such as the Voting Rights Act and 45 CFR 92, the rule implementing §1557 of the Patient Protection Act, and the Americans with Disabilities Act, among several others.

From the first emergence of the modern language industry after the Second World War, language companies have used a mixed labor model, with a combination of regular employees and Independent Contractors. Our linguists work as translators, interpreters, captioners, subtitlers, and more. Roughly 80% of the language industry workforce nationally is comprised by Independent Contractors. Moreover, the majority of the workforce works remotely, thanks to advances in internet-based audio and visual communication, among other enabling technologies.

We note that the proposed regulations' acknowledgment that a remote worker who performs services from the individual's personal residence can satisfy the "B" factor of the "ABC" test. This adds significant clarity to the ABC test, as the balance of work done by our linguists is remote.

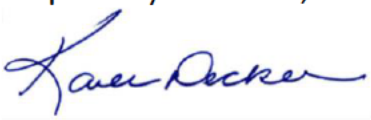
50 W Broadway Ste 333 - PMB 144591
Salt Lake City, Utah 84101-2027
www.alcus.org
+1 (856) 494-6866

However, the proposed test for the "C" factor, which as we understand is based at least in part in *East Bay Drywall, LLC v. Dep't of Labor & Workforce Dev.* (251 N.J. 477,278 A.3d 783) poses significant challenges for compliance. First, the NJ Supreme Court gave no concrete guidelines regarding the level of economic dependence that would fail this test. As a result, our members in New Jersey have seen uneven and arbitrary application of this test. Second, one of the key factors driving the use of Independent Contractors in our industry is in fact the linguistic diversity of the United States. A recent study of the languages spoken in New York City alone showed more than 700 languages.[1] Aside from Spanish and roughly another twenty languages, the communities here in the US and in New Jersey which speak these languages are very small. However, noting that Title VI of the Civil Rights Act of 1964 states that "…no **one** shall be discriminated against," (emphasis added), interpreters for healthcare, education, legal services, and more *must* be provided. For a language such as Karakalpak, a minority language of Uzbekistan found in Monmouth County, or Belarusian, no single company has enough work to provide anything like full time employment. Consequently, linguists working in these languages may contract with a dozen or more companies – locally in New Jersey and nationwide.

For the "C" test, that raises the following hypothetical: Company A contracts with Interpreter B for a specific language. Interpreter B, in turn, contracts with another 10 companies. If the New Jersey Department of Labor and Workforce Development audits Company A, then the company bears the burden of proving that Interpreter B is not economically dependent on Company A. However, Company A has only the data relative to its relationship with Interpreter B, and moreover, has no way to compel interpreter B to reveal her full earnings (thus allowing establishment of a percentage based on Company A's engagements with her) nor of compelling Interpreter B to reveal which other companies she contracts with, and for how much. We note that the New Jersey Department of Labor and Workforce Development does not contemplate that it would demand this information of Interpreter B. The C test as proposed raises significant problems as noted here, and might well be impossible to implement, as in effect, companies are asked to prove a negative based on decidedly incomplete information.

We respectfully submit that a more practical approach would be to mirror the requirements in New Jersey Supreme Court decision in *Carpet Remnant Warehouse, Inc. v. New Jersey Department of Labor*, 125 *N.J.* 567, 585 (1991). In short, the C test would rely on the written representation of the Independent Contractor that they do indeed operate an independent business.

Respectfully submitted,



ALC President

[1] Perlin, Ross. 2024. Language City: The Fight to Preserve Endngered Mother Tongues. London: Grove Press.

50 W Broadway Ste 333 - PMB 144591
Salt Lake City, Utah 84101-2027
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+1 (856) 494-6866

From: Ana Sikavica
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed New Rules: N.J.A.C. 12:11, Proposal Number PRN 2025-051
Date: Friday, July 4, 2025 5:20:01 AM

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Dear Mr. Fish,
I am submitting the following comments in strong opposition to Proposed New Rules N.J.A.C. 12:11, Proposal Number PRN 2025-051. I urge the New Jersey Department of Labor to take these comments into consideration and reconsider the rule changes proposed.

As an Independent Contractor who has worked hard to obtain my certifications - Certified Court and Medical Interpreter of Croatian, Serbian and Bosnian languages this proposal would have a negative impact on me and all residents in the State of New Jersey. Last year I worked for more than 20 different agencies all over the USA.
My languages are rare and certified interpreters are also rare. My services are needed in more than one state and a single employer that could provide me enough work doesn't exist. I have to work for a multitude of clients to survive in this business. Also, I'm a woman who is 51 and a minority. It's not easy for me to find a new career. Also I'm a mother of an 11 years old boy who needs to be taken to school and picked up which doesn't allow me to find a regular 9-5 job.
My husband is a Union 825 worker. We work hard, pay our taxes and love the state of New Jersey. Please don't repeat the California mistake, California is a ruined state on so many levels.

My objections are as follows:

- The proposal will not protect Independent Contractors—it will eliminate them.
- The NJDOL proposal will not create jobs, it will destroy them and negatively impact the New Jersey economy, just as similar policies did in California.
- The NJDOL proposal is dangerous and unreasonable.
- The proposal is based on old data and misinterpreted research.
- The DOL's approach lacks clarity and will increase confusion.
- More time and input are needed to address this complex issue.
- The NJDOL proposal ignores Federal policy changes and pending Federal legislation.
- Rules that restrict Independent Contractor work hurt women, seniors, and minorities
- The NJDOL proposal goes too far and will hurt the workers and business owners alike.

For all of the reasons stated above, I urge the New Jersey Department of Labor to reconsider the rule proposal currently set forth.
Thank you.

Ana Sikavica
Certified Court and Medical Interpreter for Croatian, Serbian and Bosnian languages
Hackensack, New Jersey

From: Stewart Rosenzweig
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Saturday, July 5, 2025 11:21:50 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Stewart Rosenzweig
39 Jasmine Way
Sewell, NJ 08080
Stew@Time-Productions-DJs.com

From: SUSAN HINKLEY
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Saturday, July 5, 2025 6:15:34 PM

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Report Suspicious

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
SUSAN HINKLEY
7-11 Green St
Metuchen, NJ 08840
Bubbasue74@aol.com

From: debbie kaplanink.com
To: Fish, David [DOL]
Subject: [EXTERNAL] Opposition to NJAC 12:11 ABC Test, Independent Contractors
Date: Sunday, July 6, 2025 8:22:43 PM

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Report Suspicious

To: David Fish, New Jersey Department of Labor & Workforce Development

Submitted via email to: david.fish@dol.nj.gov on July 6, 2025

Dear Mr. Fish,

I am writing in opposition to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors. I urge the Department to withdraw this proposal in full.

I've been a freelance writer and editor since 2001, when my first child was born. I left the traditional W2 workforce to raise my kids, but wanted to continue building my writing career and earning money on my own schedule. My career grew as they grew, and now I work full time as an empty nester where my income helped pay for their college tuition.

In any given year, I have 20-35 clients and earn more than I ever would with a W2 job in my field (I know because I've been offered full-time work – it pays a lot less). I take time off when I want, and have never had to ask a client permission to take an afternoon off for a medical appointment or activity, or to take vacation time to drive my new graduate across the country to begin their post-college life. I am my own boss.

Of all my clients since 2001, only two have insisted on a W2 employer arrangement. Given the low number of hours committed to projects for these clients, they offer no benefits. There's no health insurance. No 401k plan. No paid days off. There is no incentive to be an employee, yet there are drawbacks, such as greater potential conflicts of interest in me working with their competitors.

Imagine if all 35 of my clients said I had to be W2 (which they would not do). If I had all W2 arrangements, I would not be able to self-fund my solo 401k, where I can contribute the same I might get if I had a W2 full-time job and employee matching. As a very part-time W2 employee, I would not be able to participate in most corporate 401k plans, so my only qualified retirement savings option would be a limited $8,000 IRA (over age 50).

If New Jersey codifies the ABC test, my clients are not going to magically start hiring me as an employee, nor do I want them to. I am not exploited by having multiple clients a year – my work is actually more stable. Lose a W2 job and I'm out of work. Lose a client and I still have many more.

The ABC test is a blunt tool to solve a problem that needs a surgical instrument. It will make companies even less likely to work with contractors like me in New Jersey. That may not be your intention, but that's what will happen. The proposed rule threatens my ability to be an independent contractor.

At the June 23, 2025, public hearing about your proposal, witnesses from the Chamber of Commerce testified that it would "create substantial challenges for legitimate independent contractors," and that "virtually no work could be independent." The New Jersey Business and Industry Association's witness testified that the result of your proposal "won't be more jobs, it will be fewer jobs" – and your own proposal states that it will not create any jobs.

New Jersey's Legislature rejected a similar proposal in 2019-20 after it was met with "staunch opposition," and I was part of that opposition, testifying against it. It's hard to believe the New Jersey government is again trying to push this through. At the recent hearing, witnesses argued nearly 3-to-1 against your proposal.

I urge you to withdraw this proposed rule immediately and in full.

Debbie Abrams Kaplan

Debbie Abrams Kaplan (she/her)
Freelance Journalist and Editor

web: www.kaplanink.com
email: debbie@kaplanink.com
landline: 908.232.5498
linkedin: Debbie Abrams Kaplan

From: Jose Vicente
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Monday, July 7, 2025 7:40:42 AM

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Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

There are more than 150,000 independent financial advisors who have long been an integral part of the securities industry across the country. Independent broker-dealers and their affiliated independent financial advisors provide clients in their communities with personalized and comprehensive financial advice. We help our clients invest, save for retirement, pay for their children's education, and buy insurance to cover unexpected expenses.

Ameriprise offers me the option of being an employee or an independent contractor. Being an independent advisor is my choice and allows me the flexibility to determine how I manage my practice, which includes determining the level of staffing support to provide a high-quality client experience, our technology set, and real estate footprint. As an independent advisor, I set my own schedule, select my clients, and assume typical responsibilities of a small business owner including staff, technology and other costs.

Many financial advisors prefer the flexibility to operate within an independent channel to help serve clients well and help them plan for their future. Please help my clients and my small business continue to thrive in New Jersey by specifically excluding financial advisors and broker dealers from compliance with the ABC Test. This will allow me to continue operating as an independent contractor in New Jersey and serve my clients well now and into the future.

Sincerely,

Jose Vicente
500 N Franklin Turnpike, Suite 312A
Ramsey, NJ 07446-1160

jose.vicente@ampf.com
973-750-0888

From:	Joy Yagid
To:	Fish, David [DOL]
Subject:	[EXTERNAL] I am writing in opposition to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors. I urge the Department to withdraw this proposal in full.
Date:	Monday, July 7, 2025 9:07:23 AM

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To: David Fish, New Jersey Department of Labor & Workforce Development
Submitted via email to: david.fish@dol.nj.gov on **7-7-2025**

Dear Mr. Fish,

I am writing in opposition to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors. I urge the Department to withdraw this proposal in full.

I am a freelance photographer. I photograph events for businesses, schools, and charities. I photograph headshots for the same as well.

I have been a full time photographer since I was laid off from Merrill Lynch in 2007. In 2008 I became an LLC. For 18 years I have been my own boss, worked when I wanted to and chose my own clients. I have the freedom to chart my own path. I am independent of the people who contract me to photograph their events.

The proposed rule threatens my ability to be an independent contractor. An attorney from Troutman Pepper Locke wrote that your proposal "almost entirely eviscerates any chance for most ICs and companies using their services from establishing the workers' IC status." Attorneys at Ogletree Deakins wrote that your proposal "could make it very difficult for businesses to demonstrate that workers are independent contractors." Attorneys at Littler wrote that your proposal would not consider a person to have independent-contractor status even if we have multiple clients, are licensed in our occupation, own a registered business, and even maintain liability insurance or workers' compensation.

At the June 23, 2025, public hearing about your proposal, witnesses from the Chamber of Commerce testified that it would "create substantial challenges for legitimate independent contractors," and that "virtually no work could be independent." The New Jersey Business and Industry Association's witness testified that the result of your proposal "won't be more jobs, it will be fewer jobs" – and your own proposal states that it will not create any jobs.

Testimony at the public hearing also pointed out that New Jersey's Legislature rejected a similar proposal in 2019-20 after it was met with "staunch opposition." Testimony at the recent public hearing was similar, with witnesses being nearly 3-to-1 against your proposal.

On June 4, 2025, chairmen of the New Jersey Senate Labor, Commerce and Legislative Oversight committees wrote a letter to you, stating that your proposal may have "substantial negative impact" on properly classified independent contractors. A fourth state Senate committee chairman sent an aide to testify at the public hearing about his concerns, as well.

Your proposal threatens my ability to be an independent contractor. I urge you to withdraw this proposed rule immediately and in full.

Joy Yagid
Joy Yagid Photography LLC
Freelance Photographer

Joy

Joy Yagid
Photographer|People|Events|Nature
www.joyyagid.com for people photos
www.joyyagidart.com for art photos
https://joyyagid.substack.com/ for words
insta: joyyagid & joyyagidphoto
fb: joyyagidphotography & joyyagidphotonature
C: 201.657.6631

From: julia verderosa
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors
Date: Monday, July 7, 2025 9:31:33 AM

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Report Suspicious

Dear Mr. Fish,

I am writing in **opposition** to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors. I urge the Department to withdraw this proposal in full.

I am a freelance photographer, and have been for over 30 years. This is my life and lively hood.

The proposed rule threatens my ability to be an independent contractor. An attorney from Troutman Pepper Locke wrote that your proposal "almost entirely eviscerates any chance for most ICs and companies using their services from establishing the workers' IC status." Attorneys at Ogletree Deakins wrote that your proposal "could make it very difficult for businesses to demonstrate that workers are independent contractors." Attorneys at Littler wrote that your proposal would not consider a person to have independent-contractor status even if we have multiple clients, are licensed in our occupation, own a registered business, and even maintain liability insurance or workers' compensation.

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Testimony at the public hearing also pointed out that New Jersey's Legislature rejected a similar proposal in 2019-20 after it was met with "staunch opposition." Testimony at the recent public hearing was similar, with witnesses being nearly 3-to-1 against your proposal.

On June 4, 2025, chairmen of the New Jersey Senate Labor, Commerce and Legislative Oversight committees wrote a letter to you, stating that your proposal may have "substantial negative impact" on properly classified independent contractors. A fourth state Senate committee chairman sent an aide to testify at the public hearing about his concerns, as

well.

Your proposal threatens my ability to be an independent contractor. I urge you to withdraw this proposed rule immediately and in full.

Sincerely,
Julia

_____

julia maloof verderosa
photographer

pets.portraits.celebrations
www.juliamaloofverderosa.com
follow me @juliamaloofverderosaphoto

From: William Thesing
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Monday, July 7, 2025 10:58:16 AM

This Message Is From an External Sender
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Report Suspicious

Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

There are more than 150,000 independent financial advisors who have long been an integral part of the securities industry across the country. Independent broker-dealers and their affiliated independent financial advisors provide clients in their communities with personalized and comprehensive financial advice. We help our clients invest, save for retirement, pay for their children's education, and buy insurance to cover unexpected expenses.

Ameriprise offers me the option of being an employee or an independent contractor. Being an independent advisor is my choice and allows me the flexibility to determine how I manage my practice, which includes determining the level of staffing support to provide a high-quality client experience, our technology set, and real estate footprint. As an independent advisor, I set my own schedule, select my clients, and assume typical responsibilities of a small business owner including staff, technology and other costs.

Many financial advisors prefer the flexibility to operate within an independent channel to help serve clients well and help them plan for their future. Please help my clients and my small business continue to thrive in New Jersey by specifically excluding financial advisors and broker dealers from compliance with the ABC Test. This will allow me to continue operating as an independent contractor in New Jersey and serve my clients well now and into the future.

Sincerely,

William Thesing
5 Greentree Centre Suite 200
Marlton, NJ 08053-3422

william.j.thesing@ampf.com
856-797-0200

From:	Lisa White
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Independent Contractor
Date:	Monday, July 7, 2025 11:11:41 AM
Attachments:	FreelancePhotographer_LisaWhitePhoto_07072025.pdf

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Report Suspicious

Dear Mr. Fish,

I am writing in opposition to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors. I urge the Department to withdraw this proposal in full.

I am a freelance photographer. I photograph families including maternity, newborn and holiday photos and take headshots for business professionals and those looking for work.

I have been a full time photographer since I had my first child in 2016. I pre-pay quarterly taxes and have been able to be available for my children and their schooling through freelance work and the hours it has afforded me. This career has allowed me to connect with so many people in my community and to help create long lasting memories for my clients.

The proposed rule threatens my ability to be an independent contractor. An attorney from Troutman Pepper Locke wrote that your proposal "almost entirely eviscerates any chance for most ICs and companies using their services from establishing the workers' IC status." Attorneys at Ogletree Deakins wrote that your proposal "could make it very difficult for businesses to demonstrate that workers are independent contractors." Attorneys at Littler wrote that your proposal would not consider a person to have independent-contractor status even if we have multiple clients, are licensed in our occupation, own a registered business, and even maintain liability insurance or workers' compensation.

At the June 23, 2025, public hearing about your proposal, witnesses from the Chamber of Commerce testified that it would "create substantial challenges for legitimate independent contractors," and that "virtually no work could be independent." The New Jersey Business and Industry Association's witness testified that the result of your proposal "won't be more jobs, it will be fewer jobs" – and your own proposal states that it will not create any jobs.

Testimony at the public hearing also pointed out that New Jersey's Legislature rejected a similar proposal in 2019-20 after it was met with "staunch opposition." Testimony at the recent public hearing was similar, with witnesses being nearly 3-to-1 against your proposal.

On June 4, 2025, chairmen of the New Jersey Senate Labor, Commerce and Legislative Oversight committees wrote a letter to you, stating that your proposal may have "substantial negative impact" on properly classified independent contractors. A fourth state Senate committee chairman sent an aide to testify at the public hearing about his concerns, as well.

Your proposal threatens my ability to be an independent contractor. I urge you to withdraw this proposed rule immediately and in full.

Lisa White
Lisa White Photo

From: AC
To: Fish, David [DOL]
Subject: [EXTERNAL] Opposition to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors
Date: Monday, July 7, 2025 3:35:02 PM

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Report Suspicious

To: David Fish, New Jersey Department of Labor & Workforce Development

Submitted via email to: david.fish@dol.nj.gov on July 7, 2025

Dear Mr. Fish,

I am writing in opposition to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors. I urge the Department to withdraw this proposal in full.

My name is Annabelle Chan and I live in Edison, NJ. I make my living teaching English online to students in the USA and in other countries.

I started my career as an independent contractor in 2017. Being an independent contractor gave me the freedom to choose my hours and how much I will work. This flexibility was important to me as I still young children and I was able to schedule my work day around their needs. I did not have to worry about losing my job or being penalized because I was in charge of my own schedule. If I was working as an employee, I would not have had this flexibility and most likely would have been fired for putting my family's needs above the job.

Currently, I help my sister take care of my mom. The flexibility I have as an independent contractor enabled me to be able to be with my mom every day when she was hospitalized earlier this year. It also enabled me to be present when the therapists visited her as my mom does not speak English well and I needed to translate for her. While helping my family, I am still able to earn a living because I am an independent contractor. As an older working woman, being an independent contractor also helped me to not have to put up with ageism and being ghosted by employers who hardly respond to applications to job postings.

The proposed rule threatens my ability to be an independent contractor. An attorney from Troutman Pepper Locke wrote that your proposal "almost entirely eviscerates any chance for most ICs and companies using their services from establishing the workers' IC status." Attorneys at Ogletree Deakins wrote that your proposal "could make it very difficult for businesses to demonstrate that workers are independent contractors." Attorneys at Littler wrote that your proposal would not consider a person

to have independent-contractor status even if we have multiple clients, are licensed in our occupation, own a registered business, and even maintain liability insurance or workers' compensation.

At the June 23, 2025, public hearing about your proposal, witnesses from the Chamber of Commerce testified that it would "create substantial challenges for legitimate independent contractors," and that "virtually no work could be independent." The New Jersey Business and Industry Association's witness testified that the result of your proposal "won't be more jobs, it will be fewer jobs" – and your own proposal states that it will not create any jobs.

Testimony at the public hearing also pointed out that New Jersey's Legislature rejected a similar proposal in 2019-20 after it was met with "staunch opposition." Testimony at the recent public hearing was similar, with witnesses being nearly 3-to-1 against your proposal.

On June 4, 2025, chairmen of the New Jersey Senate Labor, Commerce and Legislative Oversight committees wrote a letter to you, stating that your proposal may have "substantial negative impact" on properly classified independent contractors. A fourth state Senate committee chairman sent an aide to testify at the public hearing about his concerns, as well.

Your proposal threatens my ability to be an independent contractor. I urge you to withdraw this proposed rule immediately and in full.

Respectfully,

Annabelle Chan

From: Brittany Englert
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 6:17:34 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Brittany Englert
156 Pine Street
Ramsey, NJ 07446
risherb@gmail.com

From: Misty Kennedy
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:25:34 AM

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Report Suspicious

Dear Mr. Fish,

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Yours sincerely,
Misty Kennedy
10 Jordan way
Monmouth Junction, NJ 08852
mistykguid@gmail.com

From: brian frampton
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:28:33 AM

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Report Suspicious

Dear Mr. Fish,

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Yours sincerely,
brian frampton
110 marter ave
Moorestown, NJ 08057
bframpton@mazzuccocpa.com

From: Christine Pagan
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:28:35 AM

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Report Suspicious

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Christine Pagan
27 Schoolhouse Rd
Neptune, NJ 07753
cp8992000@yahoo.com

From: Keith Stockton
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:29:32 AM

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Report Suspicious

Dear Mr. Fish,

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Yours sincerely,
Keith Stockton
PO Box 588
Broadway, NJ 08808
info@kastockton.com

From: Deborah Karkosky
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:29:33 AM

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Report Suspicious

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Deborah Karkosky
207 Gibson Boulevard
Clark, NJ 07066
dkarkosky@yahoo.com

From: Michael Passeri
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:31:32 AM

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Report Suspicious

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Yours sincerely,
Michael Passeri
719 Red Bank Ave
Ocean Gate, NJ 08740
mikepasseri@duck.com

From: Chris Crowne
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:31:34 AM

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Report Suspicious

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Chris Crowne
104 Millbrook Road
Washington, NJ 07882
chriscrowne33@gmail.com

From: Mary Brown
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:32:41 AM

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Report Suspicious

Dear Mr. Fish,

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Mary Brown
89 Main Street
Glen Gardner, NJ 08826
maryecardenas@yahoo.com

From: walter menna
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:40:36 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
walter menna
woodbridge
Woodbridge, NJ 07095
majortowing@gmail.com

From: Alan Luxardo
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:46:32 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Alan Luxardo
156 Camden Ave
South Plainfield, NJ 07080
ajluxardo@gmail.com

From: Connie Hughes
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:47:33 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

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Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Connie Hughes
222 Mirage Blvd
Barnegat, NJ 08005
40harpy.prints@icloud.com

From: Daniela Prazeres
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:47:36 AM

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Report Suspicious

Dear Mr. Fish,

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Yours sincerely,
Daniela Prazeres
156 Camden Ave
South Plainfield, NJ 07080
daniprazeres@yahoo.com

From: Joseph Affinito
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:48:33 AM

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Report Suspicious

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Yours sincerely,
Joseph Affinito
1718 WICKFORD RD
South Plainfield, NJ 07080
jsjla@yahoo.com

From: Mary O'Shaughnesdy
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:51:51 AM

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Report Suspicious

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Yours sincerely,
Mary O'Shaughnesdy
287 Delaware Dr
Brick, NJ 08723
Maryo206@icloud.com

From: Abigail Hazen
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:52:35 AM

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Report Suspicious

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Yours sincerely,
Abigail Hazen
447 Main Street Crosswicks NJ
Trenton, NJ 08515
abigail.hazen@gmail.com

From: Jeannine Wescoat
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:54:33 AM

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Report Suspicious

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Yours sincerely,
Jeannine Wescoat
116 Kesler Lane
Absecon, NJ 08201
jbirch104@aol.com

From: Debbie Woolman
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 9:57:37 AM

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Report Suspicious

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Yours sincerely,
Debbie Woolman
26 Prospect Ave
, 08016
Dwoolman416@yahoo.com

From: Frances Donohue
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 10:06:35 AM

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Report Suspicious

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Yours sincerely,
Frances Donohue
20 Hidden Meadows Dr
Asbury Park, NJ 07712
Frandonohue.fd@gmail.com

From: Leslie Parker
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 10:08:33 AM

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Report Suspicious

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Yours sincerely,
Leslie Parker
100 Park Blvd
Cherry Hill, NJ 08034
ljpnj@yahoo.com

From: Steven Hazen
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 10:36:34 AM

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Report Suspicious

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Yours sincerely,
Steven Hazen
447 main st crosswicks nj
Trenton, NJ 08515
Mollysbaskets5@gmail.com

From: Lauren Van Derryt
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 10:38:37 AM

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Report Suspicious

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Yours sincerely,
Lauren Van Derryt
1401 Beverly Road
Burlington, NJ 08016
lhartwyk@yahoo.com

From: Michael Ehrmann
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 11:04:03 AM

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Report Suspicious

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Yours sincerely,
Michael Ehrmann
3 Amalfi Court
Robbinsville, NJ 08691
Mike@dcsphoto.net

From: Christopher Gillan
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Wednesday, July 9, 2025 11:09:17 AM

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Report Suspicious

Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

There are more than 150,000 independent financial advisors who have long been an integral part of the securities industry across the country. Independent broker-dealers and their affiliated independent financial advisors provide clients in their communities with personalized and comprehensive financial advice. We help our clients invest, save for retirement, pay for their children's education, and buy insurance to cover unexpected expenses.

Ameriprise offers me the option of being an employee or an independent contractor. Being an independent advisor is my choice and allows me the flexibility to determine how I manage my practice, which includes determining the level of staffing support to provide a high-quality client experience, our technology set, and real estate footprint. As an independent advisor, I set my own schedule, select my clients, and assume typical responsibilities of a small business owner including staff, technology and other costs.

Many financial advisors prefer the flexibility to operate within an independent channel to help serve clients well and help them plan for their future. Please help my clients and my small business continue to thrive in New Jersey by specifically excluding financial advisors and broker dealers from compliance with the ABC Test. This will allow me to continue operating as an independent contractor in New Jersey and serve my clients well now and into the future.

Sincerely,

Christopher Gillan
2 Ridgedale Ave Ste 250, Cedar Knolls, NJ
Cedar Knolls, NJ 07927-1108

christopher.j.gillan@AMPF.com
973-794-6804

From: Michael Foley
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 11:50:33 AM

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Report Suspicious

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Yours sincerely,
Michael Foley
23 Fieldcrest Lane Brick NJ
Brick, NJ 08724
mickey.foley1987@gmail.com

From: Salvatore Coniglio
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 11:57:34 AM

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Report Suspicious

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Yours sincerely,
Salvatore Coniglio
267 MerMhants Ave South Plainfield NJ
South Plainfield, NJ 00070
Salc25@hotmail.com

From: Sylvia D"Andrea
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed New Rules: N.J.A.C. 12:11 ABC Test; Independent Contractors
Date: Wednesday, July 9, 2025 11:58:09 AM

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Report Suspicious

Dear Mr. Fish,

I respectfully urge you not to pass N.J.A.C. 12:11.

My husband and I have worked throughout our careers as independent freelancers (art lectures, artwork, clothing designer, etc). We enjoyed the freedom to work as little or as much (mostly as much) as we desired, in a country that still operated as a democracy with individual freedoms and free commerce.

This proposed bill cannot help New Jersey's economy, but rather destroy it, most especially the truckers who move product throughout this state.

Presently, New Jersey companies are laying off employees by the hundreds, resulting in more people already applying for unemployment benefits. It is unlikely, in most of the independent worker categories, that they will be hired--and that means more people will apply for unemployment benefits.

I respectfully urge you not to pass N.J.A.C. 12:11.

I believe this will cause major harm to the New Jersey economy and put additional strain on our unemployment budget.

From: Stanley Costigan
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 12:14:33 PM

This Message Is From an Untrusted Sender
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Report Suspicious

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Yours sincerely,
Stanley Costigan
31 Cleveland street
Caldwell, NJ 07006
stashcostigan@yahoo.com

From: deadboyv@aol.com
To: Fish, David [DOL]
Subject: [EXTERNAL] Opposition to PRN 2025-051 – ABC Test for Independent Contractors
Date: Wednesday, July 9, 2025 12:28:46 PM

This Message Is From an Untrusted Sender
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Report Suspicious

Dear Mr. Fish:

This comment is submitted to express opposition to PRN 2025-051 – ABC Test for Independent Contractors. As an independent contractor operating in New Jersey, this regulation would make it impossible for me to continue operating and earning income for my creative services. I urge you to withdraw the proposal at the end of the comment period. Should the rule move forward or be re-proposed, I ask that it include exemptions for the critical industries exempted in California to limit the unintended consequences of the ABC test and to avoid the severe disruption experienced in that state.

By way of background, I work as an independent contractor in several creative industries, including music, graphic design, and art. Over the years, I have had the opportunity to lend my time and talents to various causes, including performing at fundraisers for progressive issues and Democratic candidates. The ability to work as a contractor allows me to supplement income from my primary job and maintain the flexible schedule required of an artist who plays gigs and takes side work in a number of industries.

California is the only other state in the nation to attempt to enact a proposal as sweeping as PRN 2025-051. In that state, the ABC test did not help contractors like me. In fact, it put them out of work. Music venues were suddenly required to employ the bands who played gigs on their stages. Freelance musicians were technically required to become employees of a bandleader. Sitting in on a recording session required a deep dive into employment law. The impact was chilling.

Thankfully, California lawmakers recognized the ABC had no place in creative services and exempted the music industry, graphic designers, and a host of other services. Alarmingly, the New Jersey proposal has none of the California exemptions. It would cause chaos across the economy. From insurance agents and financial services professionals on New Jersey Main Streets to artists like me playing gigs at bars and clubs, it would create a host of negative consequences because it treats us all as exploited workers when nothing could be further from the truth. That is wrong.

When a regulation intended to help workers like me actually causes harm by making it more difficult to make a living, the state should step back and reassess. For this reason, I urge you to withdraw the proposal. If you do proceed or revive it at a later date, at least learn from the mistakes made in California and exempt the industries that received exemptions there. The California experiment shows the ABC test is a flawed policy on its own. At minimum, it needs guardrails. The fact that there are none in New Jersey is a

mistake and a sign that this proposal is not ready to advance.

Sincerely,

Johnny Ott
Musician, Artist, Graphic designer, Illustrator

From: Joe Affatato
To: Fish, David [DOL]
Subject: [EXTERNAL] Opposition to PRN 2025-051 – ABC Test for Independent Contractors
Date: Wednesday, July 9, 2025 12:30:29 PM

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Report Suspicious

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
PO Box 110, 13th Floor
Trenton, New Jersey 08625-0110

RE: Opposition to PRN 2025-051 – ABC Test for Independent Contractors

Dear Mr. Fish:

I am writing to express serious concerns regarding the Department's proposed regulations implementing a strict ABC test for worker classification in New Jersey. As an independent insurance broker with Farm Family Insurance in Hamilton Township, I have built my career and small business around the independent contracting model. The proposed regulations, if adopted without proper consideration and exemptions, would fundamentally disrupt my business, harm thousands of similarly situated professionals across New Jersey, and hurt the consumers we serve. For this reason, it should be withdrawn and reconsidered. If re-proposed, it must be modified to exempt industries that are exempt from California's ABC test.

As a lifelong Democrat and active participant in Hamilton Township politics, I have long supported policies that protect workers and strengthen our communities. I believe in the important role that the government plays in ensuring fair treatment for all workers. However, the proposed ABC test is not the right solution. The ABC test, unconstrained without exemptions, represents a blunt instrument that will cause significant collateral damage to legitimate independent contractors and small businesses.

The narrative surrounding independent contractors often focuses on gig economy workers, but this perspective overlooks the hundreds of thousands of highly skilled, licensed professionals who have deliberately chosen the independent contractor model. According to research by NERA Economic Consulting, more than half a million professionals in insurance and financial services work as independent contractors nationwide, including nearly one out of every seven insurance agents, financial advisors, and securities agents. We are not vulnerable workers in need of protection. We are successful business owners who have made informed choices about our career paths. Yet legal experts and industry trade associations widely agree that the proposal in question would ignore our wishes and reclassify us as employees.

Many of my colleagues and I chose the independent contractor model because it allows us to build businesses, serve clients effectively, and maintain control over our professional lives. As

an independent contractor, I maintain the freedom to choose when I work, whom I hire for support, and where I offer my services. Many of us represent multiple insurance companies. We own our client relationships and have built substantial value in our businesses that we can transfer or sell upon retirement. The proposed regulations would eliminate all of these advantages and deliver no benefits in return.

California's experience with a strict ABC test should serve as a cautionary tale for New Jersey. After implementing similar regulations in 2020, California did not successfully convert independent contractors to employees. Instead, it eliminated work opportunities. Self-employment decreased by 10.5% among affected occupations, while overall employment in those sectors fell by 4.4%. The law created such disruption that California lawmakers initially exempted around two dozen professions, including insurance, and have since been forced to exempt more than 100 professions to address the unintended consequences. New Jersey should not simply ignore this experience and blindly proceed with a broader proposal

I respectfully urge the Department to withdraw the proposed ABC test regulations. If the Department is committed to proceeding with some form of ABC test, it must include exemptions for the licensed professional services and other industries that California exempted. The ABC test cannot distinguish between a gig worker at risk of exploitation and a thriving insurance business in Hamilton, New Jersey, but the New Jersey Labor Department can. As a result, the Department must intervene to limit the harm by withdrawing this proposal and making a more targeted attempt to fight misclassification.

Respectfully submitted,

Joseph Affatato
Independent Insurance Broker
Farm Family Insurance
Hamilton, New Jersey

Sent with Proton Mail secure email.

From: Benjamin Burklow
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Wednesday, July 9, 2025 12:51:41 PM

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Report Suspicious

Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

There are more than 150,000 independent financial advisors who have long been an integral part of the securities industry across the country. Independent broker-dealers and their affiliated independent financial advisors provide clients in their communities with personalized and comprehensive financial advice. We help our clients invest, save for retirement, pay for their children's education, and buy insurance to cover unexpected expenses.

Ameriprise offers me the option of being an employee or an independent contractor. Being an independent advisor is my choice and allows me the flexibility to determine how I manage my practice, which includes determining the level of staffing support to provide a high-quality client experience, our technology set, and real estate footprint. As an independent advisor, I set my own schedule, select my clients, and assume typical responsibilities of a small business owner including staff, technology and other costs.

Many financial advisors prefer the flexibility to operate within an independent channel to help serve clients well and help them plan for their future. Please help my clients and my small business continue to thrive in New Jersey by specifically excluding financial advisors and broker dealers from compliance with the ABC Test. This will allow me to continue operating as an independent contractor in New Jersey and serve my clients well now and into the future.

Sincerely,

Benjamin Burklow
4 Century Drive
Parsippany, NJ 07054-4606

benjamin.t.burklow@ampf.com
973-265-1185

From: Zachary Alexander
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 1:30:35 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Zachary Alexander
16 Jonathan Ct Red Bank NJ
Red Bank, NJ 07701
zackalex10@gmail.com

From: Erick Cedano
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 1:54:40 PM

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Yours sincerely,
Erick Cedano
277 N. Broad St., Elizabeth, NJ
Elizabeth, NJ 07208
ericed@duck.com

From: James Bagley
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 2:24:35 PM

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Yours sincerely,
James Bagley
103 Seaview Court
Neptune, NJ 07753
jebagley3@gmail.com

From: Elisabeth Landi
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 3:50:35 PM

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Report Suspicious

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Yours sincerely,
Elisabeth Landi
26 McAdoo Avenue
Trenton, NJ 08619
elandicsr@msn.com

From: Y B
To: Fish, David [DOL]
Subject: [EXTERNAL] Public Comment on Proposed Rule – 57 N.J.R. 894(a) – Request for Consideration of Coaching and Consulting Professionals
Date: Wednesday, July 9, 2025 4:53:47 PM

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Dear Mr. Fish,

I am writing to express my deep concern regarding the proposed rule published in the New Jersey Register on May 5, 2025 (57 N.J.R. 894(a)), which seeks to codify a strict interpretation of the ABC test for determining independent contractor status. While I understand and support the Department's intent to protect workers from misclassification and exploitation, I respectfully urge you to consider the unintended consequences this rule may have on legitimate, independently operating professionals—particularly life coaches, speaker coaches, and independent consultants.

These professionals are not part of the gig economy in the traditional sense. Many of us operate as true entrepreneurs: we establish legal business entities, maintain our own websites and marketing channels, invest in continuing education, and serve a diverse client base across industries and geographies. We are not economically dependent on any single client, nor do we perform work under the control or direction of those who hire us. In fact, our value lies in our independence, objectivity, and ability to bring outside expertise to the organizations and individuals we serve.

Under the proposed rule, however, the rigid application of Prong B of the ABC test—requiring that our services fall outside the usual course of the hiring entity's business—could result in the reclassification of many legitimate consultants and coaches as employees. This would not only undermine our autonomy and business models, but also reduce access to specialized services for small businesses, nonprofits, and individuals who rely on flexible, project-based support.

California's experience with AB 5 offers a cautionary tale. The initial law caused widespread disruption across creative and consulting professions, prompting the legislature to enact AB 2257, which carved out dozens of exemptions for legitimate independent workers. New Jersey has the opportunity to learn from this precedent and craft a more balanced approach from the outset.

I respectfully request that the Department consider:

- Carving out exemptions or safe harbors for coaching and consulting professionals who meet objective criteria of independence (e.g., business registration, multiple clients, control over work).
- Providing clear guidance on how Prong B will be interpreted in contexts where the

hiring entity and the contractor may share overlapping subject matter but operate with distinct roles and business models.

- Engaging in further dialogue with stakeholders from the coaching and consulting communities to ensure the rule supports both worker protections and entrepreneurial freedom.

Thank you for your attention to this matter and for your commitment to fair and thoughtful labor policy in New Jersey.

Sincerely,

Yarona Boster

Footprints Coaching LLC
Yarona Boster LLC
Jamesburg, NJ

From: Lori Matteo
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 6:46:50 PM

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Report Suspicious

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Lori Matteo
33 Oakwood Village, Apt 4, Flanders, NJ
Flanders, NJ 07836
Lorimerarealtor@msn.com

From: Lori Matteo
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 6:51:35 PM

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Report Suspicious

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Yours sincerely,
Lori Matteo
33 Oakwood Village, Apt 4, Flanders, NJ
Flanders, NJ 07836
Lorimerarealtor@msn.com

From: Molly Hazen
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 8:25:34 PM

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Report Suspicious

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Yours sincerely,
Molly Hazen
447 Main Street, Box 272, Crosswicks,NJ
Trenton, NJ 08515
mollysbaskets5@gmail.com

From: Kathryn Ocallahan
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 10:27:34 PM

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Report Suspicious

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Yours sincerely,
Kathryn Ocallahan
263 Wilson ave
Middletown, NJ 07748
Ksocallahan67@yahoo.com

From: Kristina Leszczak
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 9, 2025 10:38:34 PM

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Report Suspicious

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Yours sincerely,
Kristina Leszczak
124 Solar Drive
Brick, NJ 08724
Kristinalesz@gmail.com

From: Michael Mastanduno
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:18:36 AM

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Yours sincerely,
Michael Mastanduno
47 Clearmont Ave
Denville, NJ 07834
firemike07@aol.com

From: Helen Mastanduno
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:19:36 AM

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Yours sincerely,
Helen Mastanduno
47 Clearmont Ave
Denville, NJ 07834
helenpkcheong@gmail.com

From: Lisa Mastanduno
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:21:33 AM

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Yours sincerely,
Lisa Mastanduno
15 Fleetwood Road
Woodbridge, NJ 07095
lmastanduno@aol.com

From: Thomas Baxter
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:29:34 AM

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Yours sincerely,
Thomas Baxter
145 Lilac Drive
Annandale, NJ 08801
tbaxter21@gmail.com

From: Andrea Ginnelly
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:31:32 AM

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Report Suspicious

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The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Andrea Ginnelly
606 Barbara Road
Landing, NJ 07850
andrea7948@aol.com

From: Tim Crouse
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:40:34 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

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Yours sincerely,
Tim Crouse
284 Andersen Road
Milford, NJ 08848
Timmcrouse@gmail.com

From: Kevin Kurdziel
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:41:34 AM

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Report Suspicious

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Yours sincerely,
Kevin Kurdziel
28 Kipling Way, Manalapan Township, NJ, USA
Manalapan, NJ 07726
kevin.kurdziel@verizon.net

From: Michael Hoppe
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:42:32 AM

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Report Suspicious

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Yours sincerely,
Michael Hoppe
28 Gloucester Court
Bordentown, NJ 08505
hop222@msn.com

From: BRENDA DELPREORE
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:44:32 AM

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Report Suspicious

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
BRENDA DELPREORE
14 Kentwood Rd
Succasunna, NJ 07876
bdelpreore@verizon.net

From: DAVID DULEBA
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:47:33 AM

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Report Suspicious

Dear Mr. Fish,

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Yours sincerely,
DAVID DULEBA
64 BURNET ST
Maplewood, NJ 07040
SVEeNSKA@VERIZON.NET

From: Scott Rademacher
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:50:35 AM

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Report Suspicious

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Yours sincerely,
Scott Rademacher
11
Hazlet, NJ 07730
srademacher@verizon.net

From: William J. Ludlum
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:56:33 AM

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Report Suspicious

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Yours sincerely,
William J. Ludlum
925 Cranford Ave
Westfield, NJ 07090
wjludlum@gmail.com

From: Brian Sniatkowski
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 8:07:35 AM

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Report Suspicious

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Yours sincerely,
brian sniatkowski
30 Northwood Dr
High Bridge, NJ 08829
briansnat@gmail.com

From: Sandra Roth
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 8:08:34 AM

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Report Suspicious

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Yours sincerely,
Sandra Roth
12 King ST, Box 324
Oldwick, NJ 08858
sroth55@embarqmail.com

From: sherry washington
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 8:16:50 AM

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Report Suspicious

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Yours sincerely,
sherry washington
109 AMWELLBURY ROAD
Salem, NJ 08079
sherr314@yahoo.com

From: Marianne Zelinack
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 8:23:34 AM

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Report Suspicious

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Yours sincerely,
Marianne Zelinack
Somerset
Somerset, NJ 08873
zelinackfamily@aol.com

From: Thomas Stremme
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 8:30:33 AM

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Report Suspicious

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Yours sincerely,
Thomas Stremme
803 Stagecoach Road, Marmora
Marmora, NJ 08223
tstremme1@icloud.com

From: Anita Levine
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 8:58:07 AM

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Report Suspicious

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Yours sincerely,
Anita Levine
336 Hoover ave.
Bayville, NJ 08721
animarinc@yahoo.com

From: Michele Vollmer
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 9:00:42 AM

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Report Suspicious

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
Michele Vollmer
171 Medford Blvd
Freehold, NJ 07728
michelevollmer@mac.com

From: Mark Violi
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 9:06:37 AM

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Report Suspicious

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Yours sincerely,
Mark Violi
620 Paxson Ave
Trenton, NJ 08619
marklvioli@gmail.com

From: Michael Oliver
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 9:07:34 AM

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Report Suspicious

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Yours sincerely,
Michael Oliver
6 Patterson Lane
Manalapan, NJ 07726
olivermjr@gmail.com

From: Thomas Deacon
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 9:08:33 AM

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Report Suspicious

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Yours sincerely,
Thomas Deacon
133 Frederick Street
Phillipsburg, NJ 08865
deacontw74@verizon.net

From: Rebekah Lodato
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 9:27:33 AM

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Report Suspicious

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Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Rebekah Lodato
51 Chesterfield Crosswicks Road
Crosswicks, NJ 08515
rebekahm3323@gmail.com

From: Eszter Huebscher
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 9:31:38 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
Eszter Huebscher
2 Pheasant Run road
Great Meadows, NJ 07838
eszter.huebscher@yahoo.com

From: Holly Jahn
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 9:42:33 AM

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Report Suspicious

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Yours sincerely,
Holly Jahn
41 Janet Ct
Milltown, NJ 08850
Hollyrjahn25@gmail.com

From: Magdalena Lewicki
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 10:01:34 AM

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Report Suspicious

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Yours sincerely,
Magdalena Lewicki
576 New Centre Rd
Hillsborough, NJ 08844
ruda630@yahoo.com

From: Diana Van Hise
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 10:06:33 AM

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Report Suspicious

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Yours sincerely,
Diana Van Hise
41 Janet Ct
Milltown, NJ 08850
dlvanhise@gmail.com

From: Ronnie Ann De Pasquale
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 10:20:33 AM

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Report Suspicious

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Yours sincerely,
Ronnie Ann De Pasquale
Danville Mountain
Great Meadows, NJ 07838
radp1994@yahoo.com

From: Andrew Debkowski
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 10:39:33 AM

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Report Suspicious

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Yours sincerely,
Andrew Debkowski
77 DEACON DR
Trenton, NJ 08619
adebkowski@gmail.com

From: Jillian Goldfeder
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 10:50:32 AM

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Report Suspicious

Dear Mr. Fish,

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Yours sincerely,
Jillian Goldfeder
31 Harness Ln
Marlboro, NJ 07746
jillianforemost@aol.com

From: Barbara Lysenko
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 11:26:34 AM

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Report Suspicious

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Yours sincerely,
Barbara Lysenko
246B Coolidge Avenue
Seaside Heights, NJ 08751
Barbara.Lysenko@gmail.com

From: Robert McDonald
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed Rule NJAC 12:11
Date: Thursday, July 10, 2025 11:29:15 AM

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Report Suspicious

Dear Mr. Fish,

In re: proposed Rule NJAC 12:11, as a independent contractor I am AGAINST having this Rule esablished in New Jersey. Please pass my concern to the powers that be in the the Department of Labor, specifically to Commissioner Robert Asaro-Angelo.

Thank you for your time and consideration in this matter.

Regards,
Robert McDonald
Mercerville, NJ

From: Julie Capello
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 11:45:33 AM

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Report Suspicious

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Yours sincerely,
Julie Capello
18 Tall Timber Dr
Califon, NJ 07830
julie.capello@yahoo.com

From: Joseph Barracato
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 12:37:35 PM

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Report Suspicious

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Yours sincerely,
Joseph Barracato
7 Cherry Bend Dr
Howell, NJ 07731
Baracataevents@gmail.com

From: Jennifer Kohn
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 1:13:33 PM

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Report Suspicious

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Yours sincerely,
Jennifer Kohn
6 Tracy Lane
Morris Plains, NJ 07950
jld0209@gmail.com

From: Caitlyn Vollmer
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 1:56:34 PM

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Report Suspicious

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Yours sincerely,
Caitlyn Vollmer
171 Medford blvd
Freehold, NJ 07728
Caitlyn.vollmer@me.com

From: Jessica Connors
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 2:04:26 PM

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Report Suspicious

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Yours sincerely,
Jessica Connors
703 Oxford Rd
Lanoka Harbor, NJ 08734
jess@tortugacreative.com

From: Robert Ditrani
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Thursday, July 10, 2025 2:30:08 PM

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Report Suspicious

Dear Executive Director Fish,

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

Like other advisors, I must be associated with a broker-dealer to meet federal and state requirements — but this is a legal compliance measure, not an employment relationship. The broker-dealer actually provides me with services that help me meet my clients' needs — similar to how any business might use software, IT, or legal support. I control how I run my business, who I work with, and how I serve my clients.

Mischaracterizing this relationship as employment not only threatens my livelihood but could lead to fewer financial advisors operating in New Jersey — a blow to the local economy and to residents who rely on our expertise. If advisors are pushed out or driven to other states, clients here will suffer.

I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Robert Ditrani
PO Box 1820
Morristown, NJ 07962
robert.ditrani@lpl.com

From: Leslue Beck
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Thursday, July 10, 2025 2:30:08 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

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Sincerely,

Leslue Beck
9 Lincoln Ave
Rutherford, NJ 07070
leslie@compasswealthmanagement.net

From: michael carter
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, July 10, 2025 2:40:10 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

michael carter
841 Ensign Dr
Forked River, NJ 08731
michael.carter@lpl.com

From: John Natale
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, July 10, 2025 3:10:08 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

John Natale
102 N Lancaster Ave
Margate City, NJ 08402
JNatale@LincolnInvestment.com

From: James Koerner
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Thursday, July 10, 2025 3:20:08 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

Like other advisors, I must be associated with a broker-dealer to meet federal and state requirements — but this is a legal compliance measure, not an employment relationship. The broker-dealer actually provides me with services that help me meet my clients' needs — similar to how any business might use software, IT, or legal support. I control how I run my business, who I work with, and how I serve my clients.

Mischaracterizing this relationship as employment not only threatens my livelihood but could lead to fewer financial advisors operating in New Jersey — a blow to the local economy and to residents who rely on our expertise. If advisors are pushed out or driven to other states, clients here will suffer.

I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

James Koerner
46 Cliffside Dr
Toms River, NJ 08755
jkoerner@koernercpa.com

From: Arthur Hoffman
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 3:35:35 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Arthur Hoffman
11 Hancock Pl
Somerset, NJ 08873
awhoffman49@comcast.net

From: Joseph Norris
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, July 10, 2025 3:50:07 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Joseph Norris
769 Cornwallis Dr
Mount Laurel, NJ 08054
joe.norris@lpl.com

From: Devin Poonai
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 5:47:33 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Devin Poonai
65 Evelyn Avenue
Franklin Park, NJ 08823
dp102288@gmail.com

From: David Cohen
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, July 10, 2025 6:10:15 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

David Cohen
3 Nicole Dr
Somerset, NJ 08873
david.cohen@sterlingfinancialmgt.com

From: Robert IOLA
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, July 10, 2025 6:30:11 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Robert IOLA
6 Hillview Dr
Califon, NJ 07830
riola@ifg1990.com

From: Jackie Trinity
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:15:50 PM

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Report Suspicious

Dear Mr. Fish,

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The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Jackie Trinity
3728 Symes Drv.
Belle Mead, NJ 08502
redracer5@comcast.net

From: Jackie Trinity
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 10, 2025 7:16:32 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
Jackie Trinity
3728 Symes Drv.
Belle Mead, NJ 08502
redracer5@comcast.net

From: Richard D"Ambola
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, July 10, 2025 10:40:09 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

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These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Richard D'Ambola
165 State Route 10 E
Succasunna, NJ 07876
rdambola@cfdinvestments.com

From: Thomas Weber
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Friday, July 11, 2025 9:20:11 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

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I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Thomas Weber
170 W Newell Ave
Rutherford, NJ 07070
tweber@aptam.com

From: Zahirah Miranda Perez
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 11:04:35 AM

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Report Suspicious

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The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Zahirah Miranda Perez
1312 Barbara Ave
Union, NJ 07083
zmirandaperez@gmail.com

From: Kathleen Morin
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 11:53:34 AM

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Report Suspicious

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
Kathleen Morin
10 Meadowlark ln
East Brunswick, NJ 08816
kathygmorin@gmail.com

From: Pradipkumar Sharma
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 12:03:34 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
Pradipkumar Sharma
27Summer St Unit A Lodi
, 07466
pradipkumarsharma@outlook.com

From: Vivian Rohrsetzer
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 12:04:35 PM

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Report Suspicious

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Yours sincerely,
Vivian Rohrsetzer
816 Palisade Ave
Union City, NJ 07087
82siedylmia@gmail.com

From: Vivian Rohrsetzer
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 12:06:33 PM

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Report Suspicious

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Yours sincerely,
Vivian Rohrsetzer
816 Palisade Ave
Union City, NJ 07087
82siedylmia@gmail.com

From: Vivian Rohrsetzer
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 12:06:33 PM

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Yours sincerely,
Vivian Rohrsetzer
816 Palisade Ave
Union City, NJ 07087
82siedylmia@gmail.com

From: Thomas Jauch
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 12:23:33 PM

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Report Suspicious

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Yours sincerely,
Thomas Jauch
53 Longview Ave
Randolph, NJ 07869
jauch.tom@gmail.com

From: lisa rosman
To: Fish, David (DOL); lisa rosman
Subject: [EXTERNAL] ABC test
Date: Friday, July 11, 2025 1:19:30 PM

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Report Suspicious

Hi Mr. Fish,

I am a portrait photographer with a small LLC *sole proprietor* business and a photography studio based in Millburn NJ (and clients that I work with on-location). I have been hearing rumblings of fear in my small business community about the codification of the proposed new rules for the statutory ABC test with regard to independent contractor vs. employee status.

I've been patiently and carefully reading through all the details of this proposal and I am still trying to ascertain if my small business will be determined to be "an employee" by a "putative employer" and how that would impact me and my business, since the 3-pronged ABC test is open for interpretation. Even though I have read the ABC's and I personally think I would NOT fall into the employee category, but remain an independent contractor, someone else interpreting the three prongs may not agree.

1. https://nj.gov/labor/assets/PDFs/Legal%20Notices/Notices%20of%20Proposal/57%20N.J.R.%20894_a_.pdf?_gl=1*3h93ag*_ga*MTM5Mzg1Nzg0MS4wNzUxOTAxMzQx*_ga_NSRFJ4LE4D*czE3NTIyNDY3MzgkbnMkZzEkdDE3NTIyNDkyNzkkajI2JGxwJGgw*_ga_2F7W0D0NDJ*czE3NTIyNDY3MzgkbnMkZzEkdDE3NTIyNDkyNzkkajI0JGxwJGgw&_ga=2.138121465.833764570.1752244613-1393837841.1751901341
2. Division of Employer Accounts | For employers: Independent contractors vs. employees

> **Division of Employer Accounts | For employers: Independent contractors v...**
> CXT - CMS
> New Jersey Department of Labor Who qualifies as an employer?

3. https://www.nj.gov/labor/forms_pdfs/ea/Employee%20Informational%20Packet%20.pdf?_gl=1*1fwxmq*_ga*MTM5Mzg1Nzg0MS4wNzUxOTAxMzQx*_ga_2F7W0D0NDJ*czE3NTIyNDY3MzgkbnMkZzAkdDE3NTIyNDY3MzgkajYwJGxwJGgw*_ga_NSRFJ4LE4D*czE3NTIyNDY3MzgkbnMkZzAkdDE3NTIyNDY3MzgkajYwJGxwJGgw&_ga=2.171661289.833764570.1752244613-1393837841.1751901341

Many of my fellow independent contractor photographer friends are panicking about this passing but I am still not 100% certain I understand why.

If you could explain in simple terms how, if at all, these new rules would impact me and my small business positively or nagatively, I would be ever so grateful.

Thanks and kindest regards,
Lisa

--
LRG photography
www.LRGphotography.com

From: Christian Loeb
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Friday, July 11, 2025 1:40:07 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

Like other advisors, I must be associated with a broker-dealer to meet federal and state requirements — but this is a legal compliance measure, not an employment relationship. The broker-dealer actually provides me with services that help me meet my clients' needs — similar to how any business might use software, IT, or legal support. I control how I run my business, who I work with, and how I serve my clients.

Mischaracterizing this relationship as employment not only threatens my livelihood but could lead to fewer financial advisors operating in New Jersey — a blow to the local economy and to residents who rely on our expertise. If advisors are pushed out or driven to other states, clients here will suffer.

I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Christian Loeb
5 Sooy Ln
Absecon, NJ 08201
christian.loeb@lpl.com

From: Kevin Villalba
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 1:40:33 PM

This Message Is From an External Sender
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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Kevin Villalba
20 48th st.
Weehawken, NJ 07086
kvillalba1221@gmail.com

From: Izmir Bako
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 2:57:35 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
Izmir Bako
234 Center Street, New Milford , NJ,
New Milford, NJ 07646
Izmirbako@hotmail.com

From: Matthew Siegel
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, July 11, 2025 3:00:10 PM

This Message Is From an Untrusted Sender
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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Matthew Siegel
12 Michael Ct
Millstone Township, NJ 08510
matt@millstone-river.com

From: John Sonta
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 6:26:38 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
John Sonta
31 Vom Eigen Drive
Morristown, NJ 07960
john_sonta@yahoo.com

From: Vincent Canoro
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 9:14:35 PM

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Report Suspicious

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Yours sincerely,
Vincent Canoro
116 sycamore Ave Freehold new jersey
Freehold, NJ 07728
Vinnyjr@esktrucking.com

From: Howard Shinn
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 11, 2025 9:37:37 PM

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Report Suspicious

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Howard Shinn
20 E Clayton Ave
, 08312
howard.shinn1@gmail.com

From: Eileen Kreiling
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Saturday, July 12, 2025 2:06:37 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Eileen Kreiling
8 Whitman Road
Trenton, NJ 08619
eileenk2@verizon.net

From: Eileen Kreiling
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Saturday, July 12, 2025 2:07:35 PM

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Report Suspicious

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Eileen Kreiling
8 Whitman Road
Trenton, NJ 08619
eileenk2@verizon.net

From: Domenic J Lacava
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Sunday, July 13, 2025 8:12:35 PM

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Report Suspicious

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Yours sincerely,
Domenic J Lacava
1921 McKee Ave Deptford NJ 08096
Woodbury, NJ 08096
domlacava@yahoo.com

From: Dwight Baker
To: Fish, David [DOL]
Subject: [EXTERNAL] Subject: Public Comment: Support for Employee Classification under N.J.A.C. 12:11 (Full-Time Rideshare Driver Perspective)
Date: Sunday, July 13, 2025 8:39:32 PM

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Report Suspicious

Dear Mr. David Fish, Executive Director of Legal and Regulatory Services,

My name is Dwight Baker, and I am writing to submit a public comment regarding the proposed new rules under N.J.A.C. 12:11, which aim to clarify and enforce the ABC test for worker classification in New Jersey.

I have been a rideshare driver for eight years now. While much of that time was part-time, my perspective fundamentally shifted when I began driving full-time in 2018, and especially since my return to New Jersey from Regent University in Virginia in late December 2024, when I resumed full-time driving. This prolonged and in-depth experience has truly opened my eyes to how deeply exploitative companies like Uber and Lyft truly are.

I love what I do – driving and interacting with people. However, my passion for the work is increasingly overshadowed by the undeniable realities of the current "independent contractor" model. While the companies market "freedom" and "being your own boss," it's an illusion. We are constantly controlled by algorithms, dictated by surge pricing, and incentivized to chase specific rides to simply make ends meet. We have no real power to negotiate our rates, and the constant threat of deactivation looms constantly, stripping away any sense of true autonomy. This isn't what a real independent contractor experiences.

The financial instability of this model has had devastating personal consequences for me. Despite my dedication and belief that being a business owner required pushing through hardship, ride-sharing eventually contributed to a period of homelessness, as I simply couldn't keep up financially with the demands of daily life, let alone affording stable housing. It wasn't until I became more informed through resources like content creators such as Rideshare Professor and MicDropBBQ that I fully understood: the issue was not my laziness or lack of strategy, but rather the deliberate strategies of these companies designed to trap drivers in a poverty cycle.

I am a professional driver with a CDL Class B, having driven a school bus for ten years. I chose to stay in this line of work due to the promise of freedom and better earning potential with rideshare, yet I found myself shackled to chasing dollars that never truly materialized, largely due to the pervasive lack of transparency with Uber and Lyft's operations. The recent Oxford study highlighting Uber's manipulation with Upfront Fares, though not specific to New Jersey, vividly illustrates the unscrupulous nature of their business dealings globally and how their actual operations diverge from their public relations narrative. I believe that Uber is not alone in those practices but that Lyft does the same with upfront pricing in NJ!

My core conflict, and why I support the NJDOL's actions, is this: under the current law, as it's written and as the NJDOL seeks to enforce it, rideshare drivers should unequivocally be classified as employees. I understand that this means these companies would have to fundamentally alter their business model. For full-time drivers like myself, bearing all the overhead costs – gas, maintenance, insurance, rapid vehicle depreciation – without fair compensation or reimbursement is simply unsustainable. If we were employees, companies would face the legal obligation to cover these essential operating costs, as is common in other employment sectors.

My fear, which is widely shared, is that these companies will indeed "sue and sue and sue" to stall enforcement. Their goal isn't to find a fair middle ground but to protect their volume-based profit model for themselves and their investors. Drivers are clearly the least of their worries, which is evident in their aggressive promotion of costly, unproven AVs over investing in human drivers. Ironically, 99% of riders I've dealt with prefer human drivers and largely appreciate their experiences on the platform. The demand for human-driven rides is strong.

Yet, company practices are only worsening, creating tensions that push drivers and even riders to conduct off-platform rides – a technically illegal practice – simply to cut out the middleman and achieve what they consider fair compensation. This kind of widespread non-compliance is a symptom of a broken system.

I am conflicted because I want to be a true independent contractor with the freedom that implies, but the current model does not offer that freedom alongside fair compensation for my overhead. And if employee classification is the legal reality given the current law, then it must be enforced without delay. Creating a "third category" of worker, as some have proposed (like a "dependent contractor"), is simply a path to "independent contractor lite." It will only make things worse, allowing Uber and Lyft to further exploit both riders and drivers to recoup perceived losses.

We, as a state, have to do better. The current situation is untenable. If the law is to be enforced as written, then gig workers are employees, and this needs to happen as soon as possible.

Thank you for your time and for the vital work the NJDOL is doing.

Sincerely,
Dwight Baker
West Deptford, New Jersey
threefourlife@yahoo.com
(856) 562-2953

Yahoo Mail: Search, Organize, Conquer

From: Asaro-Angelo, Robert [DOL]
To: Fish, David [DOL]
Subject: rule comment
Date: Sunday, July 13, 2025 10:24:32 PM

----- Forwarded Message from LinkedIn -----

Forwarded from Kevin Kurdziel
[redacted]:

Good morning Rob,

I hope this message finds you well. It has been a while since we last spoke.

I'm writing to you regarding your Department's proposed rule change that would effectively eliminate independent contracting in New Jersey. As a recently retired public servant, I established a consulting business specializing in Workforce Development, Economic Development, Technology, and Marketing. This proposed rule, if enacted, would unfortunately put me out of business and significantly impact my ability to earn.

As someone you've known for nearly eight years, I trust you will seriously consider my concern. This issue affects not just me, but 1.7 million independent contractors across New Jersey who face the same fate. Should this rule move forward, it will not make New Jersey fairer or more affordable. Instead, many independent contractors will be forced to close their businesses, relocate, or register in more business-friendly states.

As your constituent and someone you know personally, I urge you to rescind this proposed rule. Please allow independent contractors to continue contributing positively to New Jersey's economy.

I look forward to your response.

PLEASE NOTE: This electronic message contains information from the New Jersey Department of Labor, and may contain confidential or privileged information. If you are not the intended recipient, do not read, copy or use it or disclose it to others. If you have received this message in error, please notify the sender immediately and then delete it from your system. Thank you.

From: Jeffrey Mehler
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Sunday, July 13, 2025 11:37:38 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

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Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Jeffrey Mehler
620 South Forklanding Road
Maple Shade, NJ 08052
FareEatsJeff@gmail.com

From: Michael Conk
To: Fish, David [DOL]
Subject: [EXTERNAL] Independent contractor bill
Date: Monday, July 14, 2025 9:55:08 PM

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Report Suspicious

David,
This is a NO vote. WHY, WHY would anyone wish to even propose a bill like tis. It doesn't work in California why in God's name makes you think it will work here. It will KILL the middle class in tis state. It's hard enought tokeep up tithe taxes in this state.
Michael Conk
609-658-9410

From: CARLA Ulbrich
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 15, 2025 8:01:34 AM

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Report Suspicious

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Yours sincerely,
CARLA Ulbrich
62 Bayberry Drive
Somerset, NJ 08873
carlau@comcast.net

From: Michael Eldracher
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 15, 2025 10:27:37 AM

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Report Suspicious

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Yours sincerely,
Michael Eldracher
721 Manor Dr, Brick, NJ
Brick, NJ 08723
Eldracher@yahoo.com

From: Louis Esposito
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Tuesday, July 15, 2025 3:50:08 PM

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Louis Esposito
439 Sedge Pl
Brick, NJ 08724
lee@mendhamwealthmanagement.com

From: James Burr
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Tuesday, July 15, 2025 3:50:08 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

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Sincerely,

James Burr
45 Fox Boro Rd
Wayne, NJ 07470
jburr@lincolninvestment.com

From: Robert LoPinto
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Tuesday, July 15, 2025 3:50:10 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

Like other advisors, I must be associated with a broker-dealer to meet federal and state requirements — but this is a legal compliance measure, not an employment relationship. The broker-dealer actually provides me with services that help me meet my clients' needs — similar to how any business might use software, IT, or legal support. I control how I run my business, who I work with, and how I serve my clients.

Mischaracterizing this relationship as employment not only threatens my livelihood but could lead to fewer financial advisors operating in New Jersey — a blow to the local economy and to residents who rely on our expertise. If advisors are pushed out or driven to other states, clients here will suffer.

I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Robert LoPinto
14 Meyersville Rd
Green Village, NJ 07935
robert.j.lopinto@silverspringcap.com

From: James Robinson
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Tuesday, July 15, 2025 4:10:07 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

James Robinson
5001 Partridge Way
Stevens Point, WI 54482
jjrobinson@lpl.com

From: Barry Shapiro
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Tuesday, July 15, 2025 4:30:12 PM

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Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

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I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Barry Shapiro
1603 Court North Dr
Melville, NY 11747
barry@bshapirofinancial.com

From: Howard Reizun
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Tuesday, July 15, 2025 4:40:08 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Howard Reizun
695 Bloomfield Ave
Montclair, NJ 07042
howard@evokewm.com

From: Kim Luthy
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Tuesday, July 15, 2025 4:40:09 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Kim Luthy
161 Madison Ave Ste 200
Morristown, NJ 07960
kluthy@synthesiswealth.com

From: Sean O"Brien
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Tuesday, July 15, 2025 5:10:08 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked over 20 years to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

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Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Sean O'Brien
11 Caro Ct
Red Bank, NJ 07701
sobrien@obrienwealthmgt.com

From: Michael Binkins
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 15, 2025 8:03:36 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Michael Binkins
1718 Hybrid Place
Clementon, NJ 08021
mgbinkins@comcast.net

From: Destiny Hartsfield
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 15, 2025 11:23:37 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Destiny Hartsfield
137 lilac
Browns Mills, NJ 08015
destinyhartsfield@aol.com

From: Robert Johnson
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 7:40:09 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

Like other advisors, I must be associated with a broker-dealer to meet federal and state requirements — but this is a legal compliance measure, not an employment relationship. The broker-dealer actually provides me with services that help me meet my clients' needs — similar to how any business might use software, IT, or legal support. I control how I run my business, who I work with, and how I serve my clients.

Mischaracterizing this relationship as employment not only threatens my livelihood but could lead to fewer financial advisors operating in New Jersey — a blow to the local economy and to residents who rely on our expertise. If advisors are pushed out or driven to other states, clients here will suffer.

I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Robert Johnson
19 Cranbrook Rd
Hamilton, NJ 08690
rjohnson@newcentis.com

From: Elizabeth Blanchard
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 9:20:08 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

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Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Elizabeth Blanchard
2628 Deer Path
Scotch Plains, NJ 07076
liz@frontporchfinancialllc.com

From: Scott Savage
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 9:20:08 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

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I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Scott Savage
106 Columbus Ave
Harrington Park, NJ 07640
ssavage@synthesiswealth.com

From: Albert Russo
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 9:30:10 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Albert Russo
PO Box 99
Pottersville, NJ 07979
Albert.Russo@OsaicWealth.com

From: Anthony Petsis
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 9:40:07 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

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I also employ 7 people thru my independent company and misclassifying me as an employee would not allow me to continue their employment since w-2 employees as you would would force me to be would result in 7 jobs lost!
I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Anthony Petsis
260 W Inlet Rd
Ocean City, NJ 08226
tony@apetsis.com

From: STEVEN BATTEL
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 9:40:08 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

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Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

STEVEN BATTEL
8 Ruddy Ct
Little Silver, NJ 07739
steve@libertywealthsolutions.com

From: Alexander Panas
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 9:40:09 AM

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Report Suspicious

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Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Alexander Panas
8 Alba Pl
Parsippany, NJ 07054
apanas@synthesiswealth.com

From: Robert Davis
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 10:00:28 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

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These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Robert Davis
45 Eisenhower Dr Ste 550
Paramus, NJ 07652
rwdavis@wpsllc.net

From: Claudine L
To: Fish, David [DOL]
Subject: [EXTERNAL] Public Comment – Opposition to Proposed ABC Test Rule (N.J.A.C. 12:11)
Date: Wednesday, July 16, 2025 10:39:06 AM

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Report Suspicious

David Fish
Executive Director, Office of Legal and Regulatory Services
New Jersey Department of Labor and Workforce Development
P.O. Box 110
Trenton, NJ 08625-0110
Email: david.fish@dol.nj.gov

—

Subject: Public Comment – Opposition to Proposed ABC Test Rule (N.J.A.C. 12:11)

Dear Mr. Fish,

I am writing as a Certified Registered Nurse Anesthetist (CRNA) and small business owner in New Jersey to express my strong opposition to the proposed changes to the ABC test under N.J.A.C. 12:11, which would significantly limit the ability of highly skilled healthcare professionals to operate as legitimate independent contractors.

As a CRNA, I provide essential anesthesia services to patients throughout New Jersey. Like many of my colleagues, I operate through an S corporation, work with multiple facilities, carry my own malpractice insurance, and assume full financial and legal responsibility for my services. I am not a misclassified worker—I am a licensed provider running an independent, specialized healthcare business.

Unfortunately, the proposed rule would almost certainly disqualify me from independent contractor status under Prongs A and B, regardless of how truly independent my business is. Because anesthesia is part of a hospital or surgical center's "usual course of business," I would automatically fail Prong B—even if I set my own schedule, bill through my entity, and work for multiple facilities. This is both unfair and disconnected from the realities of modern healthcare delivery.

If enacted, this rule could:

- Force CRNAs and other providers into unwanted employment arrangements.
- Reduce healthcare flexibility and availability—especially in rural or underserved areas.
- Increase costs for patients and healthcare systems alike.
- Penalize responsible professionals who have taken legal, compliant steps to run independent practices.

The ABC test may have merit in protecting vulnerable workers in certain industries, but applying it rigidly to licensed, regulated healthcare professionals—who are often required to hold their own liability coverage and corporate structure—is both misguided and harmful.

I urge you to reconsider the broad application of this rule and to include a carve-out or exemption for licensed medical professionals operating their own businesses. If the rule proceeds as written, it will disrupt the careers of countless advanced practice nurses, physicians, and therapists who are not misclassified, but entrepreneurial professionals providing high-quality, flexible care in a cost-efficient manner.

Thank you for the opportunity to comment, and I welcome any dialogue or clarification the Department can offer regarding this matter.

Sincerely,

Claudine Lombardo,
Certified Registered Nurse Anesthetist
Owner: CL Anesthesia Services, LLC

Email: CLAnesthesiaServicesLLC@gmail.com

From: Joseph Romano
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 10:40:08 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

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I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Joseph Romano
350 Evergreen Dr
North Wales, PA 19454
joseph@romanoromano.com

From: Martin McNees
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposal Number: PRN 2025-051
Date: Wednesday, July 16, 2025 11:27:24 AM
Attachments: image001.png
image002.png
New Jersey Independent Contractor Rule Letter.pdf

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Report Suspicious

Dear Mr. Fish,

Please find our firm's Comments within the attached letter, commenting on proposed Rule N.J.A.C. 12:11 (Independent Contractor Status), Proposal No. PRN 2025-051.

Thank you for your time and consideration.

Sincerely,

MADISON AVENUE SECURITIES

Marty McNees
President
mmcnees@mas-bd.com

P: 858.207.1322 | F: 858.207.1860 | www.mas-bd.com

13500 Evening Creek Drive N, Suite 555, San Diego, CA 92128
California Insurance Lic. # 0C59219

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MADISON AVENUE
SECURITIES

July 16, 2025

David Fish, Executive Director Legal and Regulatory Services
Department of Labor and Workforce Development
PO Box 110, 13th Floor Trenton, New Jersey 08625-0110

Sent via Email to david.fish@dol.nj.gov

Re: Comments on Proposed Rule N.J.A.C. 12:11 (Independent Contractor Status), Proposal No. PRN 2025-051

Dear Mr. Fish:

I am writing on behalf of Madison Avenue Securities, LLC, a broker-dealer that proudly has **53** independent financial advisors located in or licensed to serve clients in the State of New Jersey. These professionals are small business owners, entrepreneurs, and community members who help Main Street New Jersey investors navigate complex financial decisions such as preparing for unexpected life events, saving for college, planning for a dignified retirement, and building a nest egg for long-term security and financial independence. We believe the proposed rule would not only undermine their ability to operate independently, it would dismantle a proven model that supports jobs, fosters economic mobility, and delivers accessible financial advice to thousands of New Jersey residents.

We respectfully oppose the Department's proposed rule codifying the ABC test as outlined in N.J.A.C. 12:11. The proposed regulation would have serious unintended consequences for our business, the financial advisors with whom we work, and most importantly, the Main Street New Jersey investors they serve.

1. The Proposal Threatens a Proven, Compliant Business Model

Independent financial advisors operate as small business owners. They invest in their own offices, hire their own staff, assume entrepreneurial risk, and maintain autonomy over client product and services. This model is fully compatible with federal regulations overseen by the SEC and FINRA, which require broker-dealer supervision regardless of employment classification.

The proposed rule mischaracterizes that compliance oversight as control indicative of an

employment relationship, undermining the legal and operational framework under which advisors currently operate.

2. The Proposal Creates Legal and Operational Uncertainty

The regulations would expose firms and advisors to significant uncertainty about classification, leading to increased liability and compliance costs. These costs include:

- Legal and human resources assessments of contractor relationships
- Potential restructuring of compensation and operations
- Significant risk of retroactive audits and penalties

3. Reclassification Would Harm Consumers

If advisors who have opted to be independent contractors are forced to become employees:

- Many will raise client minimums or fees
- Some will leave the industry or relocate to states with clearer rules
- Access to personalized financial advice will shrink, especially for Main Street investors and underserved New Jersey communities.

Independent financial advisors are able to offer a wider array of investment products and financial services because they are not incentivized to promote an employing firm's proprietary offerings. This flexibility allows them to tailor solutions to the unique needs of their clients rather than being confined to a more restricted menu of options.

4. The Proposal Ignores Economic Reality

Reclassification will trigger additional tax, payroll, and benefits obligations, which many small firms cannot absorb. Employers may cut wages, reduce benefits, or downsize. This will ripple through the state economy, harming workers and families alike.

5. A Carve-Out for Financial Services Professionals Is Warranted

If the Department moves forward with adopting the proposed rule, we respectfully urge it to include a carve-out for financial services professionals, specifically, for registered broker-dealers, investment advisers and their representatives, consistent with the approach already enacted in

13500 Evening Creek Drive N., Suite 555 | San Diego, CA 92128
T: (888) 627-7323 | F: (858) 207-1789 | www.mas-bd.com
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California. A narrowly tailored exemption would ensure that these professionals can continue operating under a regulatory framework that already provides robust oversight. Any such exemption should include broker-dealers, agents of broker-dealers, investment advisers, and investment adviser representatives.

California's approach recognized the distinct legal and supervisory obligations already imposed on financial professionals at the federal and state level. Adopting such an exemption would protect an established, regulatorily compliant business model while maintaining the Department's ability to address worker misclassification in other sectors.

Conclusion

We urge the Department to withdraw or significantly revise the proposed rule. A one-size-fits-all test should not eliminate legitimate, mutually beneficial independent contractor relationships, especially those subject to comprehensive federal oversight and which provide immense value to Main Street New Jersey investors.

Thank you for the opportunity to comment.

Sincerely,

Martin McNees

Martin McNees

President

13500 Evening Creek Drive N., Suite 555 | San Diego, CA 92128
T: (888) 627-7323 | F: (858) 207-1789 | www.mas-bd.com

Member FINRA / SIPC, a Registered Investment Adviser.

From: Eric Rosenberger
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 1:20:07 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Eric Rosenberger
161 Madison Ave
Morristown, NJ 07960
erosenberger@synthesiswealth.com

From: Barbara Opsasnick
To: Fish, David [DOL]
Subject: [EXTERNAL] Public Comment Opposition to Proposed ABC Test Rule (N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 1:43:44 PM

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Barbara Opsasnick
84 Upper Hibernia Rd
Rockaway NJ 07866
Bopsasnick@gmail.com
9737699188
July 16, 2025

Dear Mr. Fish,

I am writing as a Certified Registered Nurse Anesthetist (CRNA) and small business owner in New Jersey to express my strong opposition to the proposed changes to the ABC test under N.J.A.C. 12:11, which would significantly limit the ability of highly skilled healthcare professionals to operate as legitimate independent contractors.

As a CRNA, I provide essential anesthesia services to patients throughout New Jersey. Like many of my colleagues, I operate through an S corporation, work with multiple facilities, carry my own malpractice insurance, and assume full financial and legal responsibility for my services. I am not a misclassified worker—I am a licensed provider running an independent, specialized healthcare business.

Unfortunately, the proposed rule would almost certainly disqualify me from independent contractor status under Prongs A and B, regardless of how truly independent my business is. Because anesthesia is part of a hospital or surgical center's "usual course of business," I would automatically fail Prong B—even if I set my own schedule, bill through my entity, and work for multiple facilities. This is both unfair and disconnected from the realities of modern healthcare delivery.

If enacted, this rule could:

- Force CRNAs and other providers into unwanted employment arrangements.
- Reduce healthcare flexibility and availability—especially in rural or underserved areas.
- Increase costs for patients and healthcare systems alike.
- Penalize responsible professionals who have taken legal, compliant steps to run independent practices.

The ABC test may have merit in protecting vulnerable workers in certain industries, but applying it rigidly to licensed, regulated healthcare professionals—who are often required to hold their own liability coverage and corporate structure—is both misguided and harmful.

I urge you to reconsider the broad application of this rule and to include a carve-out or exemption for licensed medical professionals operating their own businesses. If the rule proceeds as written, it will disrupt the careers of countless advanced practice nurses, physicians, and therapists who are not misclassified, but entrepreneurial professionals providing high-quality, flexible care in a cost-efficient manner.

Thank you for the opportunity to comment, and I welcome any dialogue or clarification the Department can offer regarding this matter.

Sincerely,
Barbara Opsasnick
Certified Registered Nurse Anesthetist
Owner, BKO Anesthesia Services

From: Edward Soorikian
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment on Proposed NJAC 12:11 – Protecting Independent Insurance Agent Status
Date: Wednesday, July 16, 2025 2:05:16 PM

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Report Suspicious

Dear Commissioner and Office of Legal & Regulatory Services,

I am a licensed independent health insurance agent in New Jersey specializing in Medicare enrollments for seniors and disabled individuals. I represent over a dozen different insurance carriers and am writing to express my concerns about the proposed rule NJAC 12:11 and its potential to unintentionally jeopardize the classification of legitimate independent agents.

Background & Qualifications:

- I operate as a sole proprietor, file a Schedule C, maintain errors & omissions insurance, and work from my home office.
- I manage my own schedule, conduct independent marketing, and do not receive leads or oversight from insurers—only CMS-required guidance.
- I assist clients in selecting the best insurance products among carriers; I am not delivering products on behalf of any single insurer.

While I fully comply with CMS regulations, I am not embedded in any carrier's internal operations. I serve as an autonomous advisor and distributor—without employer-like relationships.

Concerns Regarding Prong B:

Despite operating independently, the current phrasing of prong B—requiring work to be "outside the usual course of the hiring entity's business"—could misclassify consumer-focused agents like myself who provide core insurance services across multiple carriers.

Recommendations:

1. **Clarify or amend prong B** to account for independent insurance agents who serve multiple carriers and operate autonomously.
2. **Consider safe harbors or carve-outs** for licensed brokers acting as consumer advisors with independent business operations.
3. **Provide objective guidance** or examples to help enforcement distinguish genuine independent contractors from internal employees.

Retaining the contractor model for independent agents is critical to preserving consumer choice, compliance in federally regulated markets like Medicare, and the sustainability of small businesses in New Jersey.

Thank you for considering my input during this public comment period. I would welcome the opportunity to discuss this further or provide additional documentation if helpful.

Best regards,

Edward M. Soorikian - Independent Health Insurance Services
Medicare Advantage...Part D Prescriptions...Medicare Supplements
GetCoveredNJ...Dental/Vision...Small Group Employer Plans
Final Expenses...Term Life Insurance...Annuities
609-724-5809
insuranceagented@gmail.com

Currently I represent 10 organizations which offer 54 Medicare Advantage products in your area. You can also contact Medicare.gov, 1-800-MEDICARE or your local State Health Insurance Program (SHIP) for help with plan choices.

From: Thomas Vickers III, III
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 3:50:08 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Thomas Vickers III
1923 Highway A1a Apt C4
Indian Harbour Beach, FL 32937
tvickers@fpawealthmgmt.com

From: Steven Summa
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Wednesday, July 16, 2025 4:10:11 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Steven Summa
2 Nichols Rd
Montvale, NJ 07645
steve.summa@cambridgesecure.com

From: Sirarpi Armani
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 16, 2025 10:50:37 PM

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Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Sirarpi Armani
1375 River Rd
Edgewater, NJ 07020
Sirarpi67@gmail.com

From: Carol Sumoski
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Thursday, July 17, 2025 11:30:12 AM

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Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I am building my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve. In fact, as I am in the process of building my business I am not at the point yet of profitability that would entice any company to afford the increased costs of having me as a W2 employee.

Like other advisors, I must be associated with a broker-dealer to meet federal and state requirements — but this is a legal compliance measure, not an employment relationship. The broker-dealer actually provides me with services that help me meet my clients' needs — similar to how any business might use software, IT, or legal support. I control how I run my business, who I work with, and how I serve my clients.

Mischaracterizing this relationship as employment not only threatens my livelihood but could lead to fewer financial advisors operating in New Jersey — a blow to the local economy and to residents who rely on our expertise. If advisors are pushed out or driven to other states, clients here will suffer.

I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Carol Sumoski
919 Main St
Shiloh, NJ 08353
Carol@IntegrityWG.com

From: Lorraine Zdeb
To: Fish, David [DOL]
Subject: [EXTERNAL] Independent contractors
Date: Thursday, July 17, 2025 4:13:36 PM

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Dear David I am writing you concerning the independent contractors 1099 changing to W-2 consideration. If that were to happen I feel personally that it would be a disaster and would put so many small businesses out of business. It just seems to be getting harder and harder to own and run a business in the state of New Jersey where is our support??? I am pleading with you to take into consider all of the smaller businesses in this state that depends on independent contractors and not support this move. Thank You Lorraine Zdeb

Sent from AOL on Android

From: Jim Parks
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 4:30:14 PM

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Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Jim Parks
148 Prospect St Fl 2
Ridgewood, NJ 07450
jim@parkswm.com

From: John Venne
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 4:40:08 PM

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Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

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Thank you for your attention to this important issue.

Sincerely,

John Venne
6 Baltusrol Ter
Moorestown, NJ 08057
johnvenne@ballastfin.com

From: Olivia Grabowski
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 4:50:08 PM

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Report Suspicious

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I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Olivia Grabowski
166 Brook St
Dumont, NJ 07628
olivia.grabowski@lpl.com

From: Joseph Zito
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 4:50:09 PM

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Report Suspicious

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I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Joseph Zito
485 US Highway 1 S Ste 110
Iselin, NJ 08830
joe.zito@lpl.com

From: Michael O"Connell
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Thursday, July 17, 2025 5:00:09 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Michael O'Connell
461 From Rd
Paramus, NJ 07652
michael.oconnell@lpl.com

From: Daniel Monzi
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 5:00:14 PM

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Dear Executive Director Fish,

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Thank you for your attention to this important issue.

Sincerely,

Daniel Monzi
300 Emory St Unit 314
Asbury Park, NJ 07712
daniel.monzi@lpl.com

From: Craig Marquardt
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 5:20:08 PM

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I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Craig Marquardt
37 Deer Hill Rd
Lebanon, NJ 08833
craig.marquardt@lpl.com

From: Stephen Melchiorre
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 5:20:10 PM

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Report Suspicious

Dear Executive Director Fish,

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Our independent status allows us to:

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I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Stephen Melchiorre
1202 Laurel Oak Rd Ste 206
Voorhees, NJ 08043
steve.melchiorre@lpl.com

From: Michael O"Connell
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 5:30:08 PM

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Dear Executive Director Fish,

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While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Michael O'Connell
461 From Rd
Paramus, NJ 07652
michael.oconnell@lpl.com

From: Steven Ries
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 5:40:08 PM

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Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

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Sincerely,

Steven Ries
2301 E Evesham Rd Ste 406
Voorhees, NJ 08043
steve.ries@lpl.com

From: Timothy Mulhern
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 5:40:10 PM

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Thank you for your attention to this important issue.

Sincerely,

Timothy Mulhern
101 Crawfords Corner Rd Ste 1120
Holmdel, NJ 07733
timothy.mulhern@lpl.com

From:	Sharon Waters
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Re: Submission of written comments - N.J.A.C. 12:11 "ABC test"
Date:	Thursday, July 17, 2025 6:30:23 PM
Attachments:	written testimony - ABC test - NJ Department of Labor and WD - June 2025.pdf

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Mr. Fish,
Can you please confirm you received my written comments and they will be entered into the record? Thank you.

---------- Forwarded message ---------
From: **Sharon Waters** <sharon@sharonannwaters.com>
Date: Tue, Jun 24, 2025 at 6:11 AM
Subject: Submission of written comments - N.J.A.C. 12:11 "ABC test"
To: Fish, David [DOL] <david.fish@dol.nj.gov>

Mr. Fish,
Attached is my submission of written comments about N.J.A.C. 12:11 "ABC test." Thank you for the opportunity to testify yesterday.

--
Sharon Waters
SharonAnnWaters.com

Below is the testimony I delivered at the June 23 hearing about proposed new rule N.J.A.C. 12:11, commonly referred to as the “ABC test” for independent contractors.

I sat and listened to 46 speakers during six rounds of testimony before I had to leave. Of the 46 speakers, 12 were supportive of the proposed rule and 34 were opposed to it (I’m not counting the translator in the third round who would be a 47th speaker).

What struck me about the testimony is that almost all of the speakers testifying in favor of the proposed rule were concerned about issues and problems in the construction trades: misclassification, exploitation of workers, unfair competitive advantage for companies not following the rules. The people testifying against the proposed rule came from a wide variety of industries: financial, insurance, trucking, retail, writing/communications, tech, app-based. There were even representatives for tow-truck drivers and snow-plow operators testifying against the proposed rule because they are independent contractors (I had no idea, but now I see it).

The contrast was quite stark. It left me wondering why the NJ Department of Labor and Workforce Development, or other state regulatory entity, is not cracking down on the bad actors in construction trades. That’s where the problem seems to be, based on the June 23 testimony. Independent contractors in all the other industries are collateral damage of an effort to address a problem in the construction trades. The NJ Department of Labor and Workforce Development should scrap N.J.A.C. 12:11 and instead create a rule that addresses the issues and problems in the construction trades…without hurting independent contractors in all the other industries who oppose N.J.A.C. 12:11.

TESTIMONY ON JUNE 23:

My name is Sharon Waters and I live in Highlands, New Jersey.

In 2020, I quit my stable job at Montclair State University to become an employee of the Bloomberg 2020 presidential campaign. I worked on the campaign for only one week before Mike Bloomberg dropped out. A week later, the world shut down due to a pandemic – triggering a recession, spiking unemployment, and creating a swirl of worry and fear.

That is when I started my own business.

That transition in March 2020 from a traditional job to creating my own small business as an independent contractor was a monumental shift in my life.

What could have been a disaster when the Bloomberg campaign ended became the best decision I ever made as I launched my freelance writing and editing business. Becoming an entrepreneur during a pandemic, recession and general hell gave me a grit and get-it-done attitude that would have been unimaginable in any other way. My success gave me the confidence to sit here today, testifying in front of you, something I have never done.

Right from the start in 2020, I saw many benefits of freelancing, most notably that fall when my mother was in the hospital for 24 days. I could work at 3 a.m. … or 9 p.m. – often both – from anywhere, so I could be with her during hospital visiting hours. That is a freedom and flexibility most traditional employees do not have.

In 2022, my mom was in the hospital again for an extended period. Then on hospice. Then she died. As an employee, I've had amazing and understanding bosses...but none of them would have given me as much time off as I created for myself as my own boss.

Being an independent contractor has also meant financial success. In 2023 and 2024, I made more money at my freelance business than I have ever made as an employee.

So I do not need protection as an independent contractor.

I negotiate every assignment on my own, so no one is controlling my work nor violating my rights. No client is using loopholes to exploit me. My workplace, which is my home, is safe, and my income is high enough for me to purchase my own health insurance. I contribute to a solo 401K to continue securing my retirement. And by redistributing my hours I’ve created my own “paid” leave for vacations.

This proposed rule threatens all of that. It threatens my livelihood. It threatens what I have built from the pandemic, until now, and well into the future for my successful and thriving business. Being an independent contractor is better than any “job” I’ve ever had. It’s the best professional move I have ever made.

What you are proposing would destroy all of that. None of my clients are going to make me an employee. It makes no sense for them, nor for me. So this proposed rule will not protect me–it will harm my business and likely destroy my livelihood.

The New Jersey Department of Labor states your mission is “Opportunity. Stability. Dignity.”

THAT is what I created for myself by becoming an independent contractor. And THAT is what you are now threatening to take away with this proposed rule.

Please withdraw this proposed rule. It would take away the Opportunity, Stability and Dignity of independent contractors like me.

Sharon Waters
Independent contractor
SharonAnnWaters.com

From: Efraim Yungreis
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 7:00:13 PM

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I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Efraim Yungreis
1777 Avenue of the States
Lakewood, NJ 08701
efraim.yungreis@lpl.com

From: Michael Tekin
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 8:00:11 PM

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Thank you for your attention to this important issue.

Sincerely,

Michael Tekin
45 Mine St Fl 1
Flemington, NJ 08822
mike.tekin@lpl.com

From: Vincent Primavera
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 9:10:09 PM

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Thank you for your attention to this important issue.

Sincerely,

Vincent Primavera
1317 Route 73 Ste 106
Mount Laurel, NJ 08054
vincent.primavera@lpl.com

From: Ronald Nagy
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 17, 2025 10:00:13 PM

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Report Suspicious

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Sincerely,

Ronald Nagy
3528 Symes Dr
Belle Mead, NJ 08502
ron.nagy@lpl.com

From: Scott Geibel
To: Fish, David [DOL]
Subject: [EXTERNAL] Scott geibel
Date: Thursday, July 17, 2025 10:15:05 PM

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Do not aupport. Please don't get ride of jnde Independant contractors. Scott geibel

Yahoo Mail: Search, Organize, Conquer

From: Rian Steinbiss
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Friday, July 18, 2025 5:30:18 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for the opportunity to comment on the Department of Labor and Workforce Development's proposed regulations on independent contractors.

As an independent financial advisor, I've built a business based on trust, personal service, and long-term relationships with my clients. These proposed rules threaten that foundation by forcing a reclassification that misrepresents the very nature of my work.

Though I'm affiliated with a registered broker-dealer for compliance and regulatory purposes, I remain a business owner — not an employee. I serve my own clients, make independent decisions, and carry the responsibility and risk of operating my own practice. The broker-dealer relationship is mandated under federal and state law and exists to protect investors — not to control or direct my work.

These regulations would upend this carefully balanced system, pushing me toward an employment model that undermines the freedom and flexibility my clients expect. This disconnect between the proposed state labor rules and financial regulations creates confusion, legal risk, and real harm to small business owners like me.

Please reconsider these rules and work toward a solution that recognizes and respects both the independence of our profession and the existing regulatory safeguards that already protect the public.

Sincerely,

Rian Steinbiss
203 Hopkins Rd
Mickleton, NJ 08056
rsteinbiss@lincolninvestment.com

From: Eric Dea
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 18, 2025 7:17:51 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Eric Dea
3 Atlantis Terrace
Freehold, NJ 07728
edea21@aol.com

From: David Tepper
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 7:20:09 AM

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Thank you for your attention to this important issue.

Sincerely,

David Tepper
461 FROM RD STE 385 FL 3
PARAMUS, NJ 07652
david.tepper@lpl.com

From: Thomas Weber
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 7:50:07 AM

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Sincerely,

Thomas Weber
170 W Newell Ave
Rutherford, NJ 07070
tom.weber@lpl.com

From: Patrick Whelan
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 8:10:07 AM

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Sincerely,

Patrick Whelan
145 Wyckoff Rd Ste 101
Eatontown, NJ 07724
patrick.whelan@lpl.com

From: James Yuka
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 8:20:08 AM

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Sincerely,

James Yuka
605 Rispo Dr
Point Pleasant Boro, NJ 08742
James.Yuka@AppreciatedWealth.com

From: Tom Becker
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 8:20:26 AM

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Sincerely,

Tom Becker
23 Evergreen Dr
Woodbine, NJ 08270
tom.becker@lpl.com

From: Eden Sonta
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 18, 2025 9:19:34 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Eden Sonta
31 Vom Eigen Drive
Morristown, NJ 07960
eden.sonta@yahoo.com

From: Amy Blevins
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 9:40:11 AM

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Sincerely,

Amy Blevins
311 Bridgeton Pike
Mullica Hill, NJ 08062
amy.blevins@lpl.com

From: Kenneth Dipaola
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 9:50:10 AM

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Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Kenneth Dipaola
21 Main St Ste 202
Hackensack, NJ 07601
ken.dipaola@lpl.com

From: David Ferrell
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 9:50:11 AM

This Message Is From an External Sender
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Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

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I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

David Ferrell
10 Broad St Ste 202
Red Bank, NJ 07701
david.ferrell@lpl.com

From: Luis DaCosta
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 11:00:09 AM

This Message Is From an External Sender
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Report Suspicious

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As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

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Thank you for your attention to this important issue.

Sincerely,

Luis DaCosta
1020 Galloping Hill Rd Ste 202
Union, NJ 07083
luis.dacosta@lpl.com

From: Jessi King
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 18, 2025 11:01:35 AM

This Message Is From an External Sender
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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Jessi King
5 Hayward Street
East Orange, NJ 07017
jessimk1@gmail.com

From: Yisroel Krohn
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 11:40:09 AM

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Report Suspicious

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Thank you for your attention to this important issue.

Sincerely,

Yisroel Krohn
1559 Laguna Ln
Lakewood, NJ 08701
ymkrohn@lpl.com

From: brian sweatt
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 18, 2025 11:50:10 AM

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Report Suspicious

Dear Executive Director Fish,

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Thank you for your attention to this important issue.

Sincerely,

brian sweatt
1 Madonna Ln
Annandale, NJ 08801
brian.m.sweatt@lpl.com

From: Philip Sax
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 18, 2025 12:39:33 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Philip Sax
433 Chanticleer
Cherry Hill, NJ 08003
Philsax@hotmail.com

From: Grilo, Timothy [DOL]
To: Asaro-Angelo, Robert [DOL]
Cc: Briggs, Jonathan [DOL]; Cassese, Jason [DOL]; Fish, David [DOL]; Cassese, Jason [DOL]
Subject: Fw: NJAC 12:11
Date: Friday, July 18, 2025 3:45:05 PM
Attachments: image001.png
image002.png
image003.png
image004.png
image010.png
image011.png
image012.png
image013.png
Senator Gopal - NJAC 1211 .pdf

Good Afternoon Commissioner,

Please find the attached from LD 11 re: IC regulations.

Timothy Grilo
Director of Legislative and Intergovernmental Affairs
New Jersey Department of Labor and Workforce Development
timothy.grilo@dol.nj.gov

From: Davis, Dyese <DDavis@njleg.org>
Sent: Friday, July 18, 2025 3:06 PM
To: Grilo, Timothy [DOL] <Timothy.Grilo@dol.nj.gov>; Briggs, Jonathan [DOL] <Jonathan.Briggs@dol.nj.gov>; Cassese, Jason [DOL] <Jason.Cassese@dol.nj.gov>
Subject: [EXTERNAL] NJAC 12:11

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Hello,

Please see the attached from the LD11 Team relating to the proposed independent contractor regulations.

Dyese Davis
Chief of Staff
Office of Senator Gopal and Assemblywomen Donlon & Peterpaul
Phone: (732) 704-3808
Fax: (732) 383-5116
www.donlonpeterpaul.com
www.senatorgopal.com

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Senator Gopal:

STATE OF NEW JERSEY

DR. MARGIE DONLON
Assemblywoman, 11th District

VIN GOPAL
Senator, 11th District
Majority Whip

LUANNE PETERPAUL
Assemblywoman, 11th District

July 15, 2025

Robert Asaro-Angelo, Commissioner
NJ Department of Labor & Workforce Development
1 John Fitch Plaza
Trenton, NJ 08625

Dear Commissioner Asaro-Angelo:

We are writing this letter to urge you respectfully to reconsider the New Jersey Department of Labor's proposed rulemaking under **N.J.A.C. 12:11**, which would redefine the standards for determining independent contractor status in New Jersey. While the proposed revisions are clearly well-intentioned, we have heard from numerous constituents across varied industries concerned about how this pending rule would impact their careers and businesses. In light of these concerns, we hope the proposed rulemaking can be paused to address what we believe would be unintended consequences if the rule were finalized.

As currently proposed, we believe the revised rule would have far-reaching consequences, negatively impacting small business owners, employees, and consumers. Through the application of this proposed rule, employees who have chosen to work as independent contractors could see their relationships with small businesses disrupted, resulting in new administrative burdens on these businesses. Those disrupted relationships, and new administrative costs, may also impact consumer experiences. Considering the broad impacts this rule change could have, we believe this change warrants further study, including a formal economic impact analysis.

Thank you for your consideration. Please do not hesitate to contact us at SenGopal@NJLeg.org, AswDonlon@NJLeg.org, and Asw.Peterpaul@NJLeg.org or call our office at 732-704-3808.

Sincerely,

Vin Gopal	Margie Donlon	Luanne Peterpaul
Senator, 11th District	Assemblywoman 11th District	Assemblywoman 11th District

766 SHREWSBURY AVENUE, SUITE 100, TINTON FALLS, NJ 07724
PHONE: (732) 704-3808 • FAX: (732) 383-5116

From: Joseph Norris
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Saturday, July 19, 2025 10:20:14 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Joseph Norris
769 Cornwallis Dr
Mount Laurel, NJ 08054
joe.norris@lpl.com

From: Thomas Fox
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Sunday, July 20, 2025 1:50:32 AM

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You have not previously corresponded with this sender.

Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

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Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Thomas Fox
51 JOHN F KENNEDY PKWY FL WEST
SHORT HILLS, NJ 07078
tom@foxfinancialwm.com

From: Eric DeGesero
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Monday, July 21, 2025 10:41:33 AM

This Message Is From an External Sender
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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Eric DeGesero
525 Central Ave
Westfield, NJ 07090
edegesero@gmail.com

From: ALAN ANTONUCCI
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Monday, July 21, 2025 11:31:33 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
ALAN ANTONUCCI
38 Old Woods Rd
Saddle River, NJ 07458
alan@allcityleasing.com

From: Thomas Connery
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Monday, July 21, 2025 11:43:52 AM

This Message Is From an External Sender
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Report Suspicious

Dear Mr. Fish,

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Yours sincerely,
Thomas Connery
2900 Woodbridge Ave
Edison, NJ 08837
tconnery@rpmwarehouse.com

From: Robert Forcillo
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Monday, July 21, 2025 11:48:36 AM

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Report Suspicious

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I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
Robert Forcillo
45 Marcellus Ave.
Manasquan, NJ 08736
bob@continentalterminals.com

From: Ryan Flynn
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Monday, July 21, 2025 11:50:12 AM

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

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I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Ryan Flynn
101 Wedgewood Ln
Haddonfield, NJ 08033
ref@vallumwealth.com

From: Robert Hedler
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Monday, July 21, 2025 12:05:35 PM

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Report Suspicious

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Yours sincerely,
Robert Hedler
2900 Woodbridge Ave
Edison, NJ 08837
rhedler@rpmwarehouse.com

From: Ray Capote
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Monday, July 21, 2025 12:28:34 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

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Yours sincerely,
Ray Capote
2900 Woodbridge Avenue
Edison, NJ 08837
RCAPOTE@RPMWAREHOUSE.COM

From: Michael Barker
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Monday, July 21, 2025 1:17:35 PM

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Report Suspicious

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Yours sincerely,
Michael Barker
1703 Albert Street Hainesport NJ
Hainesport, NJ 08036
tktransport@tktransportinc.com

From: Mary Venezio
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Monday, July 21, 2025 1:55:34 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Mary Venezio
185 N Hill Road
Colonia, NJ 07067
marvenezio@comcast.net

From: ALAN ANTONUCCI
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 5:55:37 AM

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Report Suspicious

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Yours sincerely,
ALAN ANTONUCCI
38 Old Woods Rd
Saddle River, NJ 07458
alan@allcityleasing.com

From: John Cavaliere
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 7:21:47 AM

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Report Suspicious

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Yours sincerely,
John Cavaliere
12 Molsbury Lane
Millstone Township, NJ 08510
john.cavaliere@gmail.com

From: Anne Marchitelli
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 8:47:35 AM

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Report Suspicious

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Yours sincerely,
Anne Marchitelli
25 Chestnut Street
Carteret, NJ 07008
annemarch123@gmail.com

From: Joann B
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 8:56:35 AM

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Yours sincerely,
Joann B
48 LittleStreet
, 07747
3jb@comcast.net

From: Wayne Pynckels
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 9:05:35 AM

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Report Suspicious

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Yours sincerely,
Wayne Pynckels
3
, 07008
farismodawar@msn.com

From: Matthew Garber
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11
Date: Tuesday, July 22, 2025 10:10:14 AM

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Report Suspicious

Dear Executive Director Fish,

Thank you for providing the opportunity to comment on the Department of Labor and Workforce Development's independent contractor regulations.

I am an independent financial advisor, and I am deeply concerned that the regulations will negatively impact the business I worked hard to build. The regulations would force me to become an employee, forfeiting the independence that I value and that is essential to my business and my clients.

As an independent financial advisor, I am required to be associated with a registered broker-dealer firm. But this association is in no way indicative of employment. My clients are mine and I make my own business decisions. In practice, the broker-dealer I am associated with is essentially a service provider for my business, providing me with the technology, compliance, marketing and other tools that help me effectively serve my clients and provide for their financial security and build wealth.

The regulations seem less concerned with whether my business is actually independent – it is – than with strictly applying inflexible indicators that may suggest an employment situation. This approach is poorly suited to assessing the actual independence of financial advisors. The arms-length arrangement that I and other financial advisors have with our independent broker-dealers cannot be structured in a way that fully satisfies these regulations without violating federal and state securities laws designed to protect investors.

Please reconsider these regulations in light of the unintended consequences for New Jersey's independent financial advisors and our clients.

Sincerely,

Matthew Garber
19 Farmingdale Rd
East Brunswick, NJ 08816
mgarber@fcmadvisor.com

From: Sanford osofsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 10:28:34 AM

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Report Suspicious

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Yours sincerely,
Sanford osofsky
16 Mendell Avenue, Cranford, NJ, USA
Cranford, NJ 07016
sando16@verizon.net

From: Luis Bolanos
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 10:51:34 AM

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Report Suspicious

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Yours sincerely,
Luis Bolanos
109 Fairfield Ave
Fords, NJ 08863
luisbolanos27@yahoo.com

From: Isaac Marmolejos
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 11:12:36 AM

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Report Suspicious

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Yours sincerely,
Isaac Marmolejos
25 emerson st carteret nj
Carteret, NJ 07008
Fcomarmolejo21@gmail.com

From: Luis Bolanos
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 11:53:36 AM

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Report Suspicious

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Yours sincerely,
Luis Bolanos
109 Fairfield Ave
Fords, NJ 08863
luisbolanos27@yahoo.com

From: Elizabeth Bellanca
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 12:13:35 PM

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Report Suspicious

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Yours sincerely,
Elizabeth Bellanca
336
Old Bridge, NJ 08857
booper336@yahoo.com

From: Florence Yusko
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 12:26:39 PM

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Yours sincerely,
Florence Yusko
22 Judith Place,
Edison, NJ 08837
flossieyusko@yahoo.com

From: Philip Livoti
To: Fish, David [DOL]
Subject: [EXTERNAL] Re: Proposed New Rules: N.J.A.C. 12:11
Date: Tuesday, July 22, 2025 1:23:37 PM
Attachments: image001.png
2025 NJ Rule Advisor Letter to DOLWD.docx

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Report Suspicious

Please see attached….

Philip Livoti | Financial Advisor | Prudential Advisors
1 Tower Center Blvd. 16th Floor East Brunswick, NJ 08816

(732) 645-4647 (work office)
(732) 707-4921 (home office)
(877) 840-7824 (fax)

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philip.livoti@prudential.com
https://www.prudential.com/advisor/Philip-Livoti

7/22/2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov

Re: Proposed New Rules: N.J.A.C. 12:11
ABC Test; Independent Contractors

Dear Mr. Fish,

I am writing you today to express my deep concerns over the proposed rule (N.J.A.C. 12:11) that could reclassify independent contractors like me as employees.

As an agent in New Jersey, I am subject to significant licensing, continuing education, and regulatory oversight that do not apply to many other industries. We are not the type of workers this rule is intended to protect—and yet, under its current framing, many of us could be forced into employment structures that don't fit the nature of our work. It would be highly disruptive to our industry and would limit the availability of important financial products we provide to families across New Jersey.

Licensed insurance and financial professionals have an established, successful history of appropriate classification as independent contractors and are not involved in the worker classification problems found in other industries. The majority of industry agents work as independent contractors and wish to continue doing so.

Most importantly, failure to exempt independent insurance producers and financial advisors from the DOLWD proposal severely limits the scope of insurance products consumers can access, thereby limiting their ability to protect themselves and their loved ones.

I strongly urge you to reconsider moving forward with the proposed rule, as it's incompatible with the distinct characteristics of our industry and jeopardizes the financial security we offer to our clients. Its implementation would not only adversely affect the livelihood of financial professionals like myself, but it would also limit consumer access in New Jersey.

Thank you for your consideration on this matter.

Philip Livoti

1 Tower Center Blvd.

16th floor

East Brunswick, NJ 08816

From: Craig Louiselle
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed New Rules: N.J.A.C. 12:11
Date: Tuesday, July 22, 2025 1:31:21 PM

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Report Suspicious

July 22, 2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov
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Thank you for your consideration on this matter.

Craig Louiselle
Summit, NJ

Schedule a Strategy Session

Craig Louiselle, CFP®
Financial Planner
CA Insurance License #4189678
28 Beechwood Road, Suite 3N,
Summit, NJ 07901
Office: (908) 777.1121
eMail:
Craig.Louiselle@Prudential.com

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Prudential Headquarters Location: The Prudential Insurance Company of America, 751 Broad St., Newark, NJ 07102-3777

From: Sheron Raghu
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 1:32:39 PM

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Report Suspicious

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Yours sincerely,
Sheron Raghu
363 Armstrong Ave
Jersey City, NJ 07305
MikeRaghu1973@gmail.com

From:	Michael Haderer
To:	Fish, David [DOL]
Subject:	[EXTERNAL] RE: NJ Rule DOLWD Letter
Date:	Tuesday, July 22, 2025 1:36:42 PM
Attachments:	image002.png 2025 NJ Rule Advisor Letter to DOLWD.docx
Importance:	High

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Michael P. Haderer, CFP®, RICP®*
Financial Planner | Prudential Advisors

o: 732-202-4049 | **c:** 732-513-7692

a: 525 Route 73 North, Suite 202, Marlton, NJ 08053

e: Michael.Haderer@prudential.com

Prudential

Michael P. Haderer is a Financial Planner with and offers securities and investment advisory services through LPL Enterprise (LPLE), a Registered Investment Advisor. Member FINRA/SIPC, and an affiliate of LPL Financial.

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07/22/2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov

Re: Proposed New Rules: N.J.A.C. 12:11
ABC Test; Independent Contractors

Dear Mr. Fish,

I am writing you today to express my deep concerns over the proposed rule (N.J.A.C. 12:11) that could reclassify independent contractors like me as employees.

As an agent in New Jersey, I am subject to significant licensing, continuing education, and regulatory oversight that do not apply to many other industries. We are not the type of workers this rule is intended to protect—and yet, under its current framing, many of us could be forced into employment structures that don't fit the nature of our work. It would be highly disruptive to our industry and would limit the availability of important financial products we provide to families across New Jersey.

Licensed insurance and financial professionals have an established, successful history of appropriate classification as independent contractors and are not involved in the worker classification problems found in other industries. The majority of industry agents work as independent contractors and wish to continue doing so.

Most importantly, failure to exempt independent insurance producers and financial advisors from the DOLWD proposal severely limits the scope of insurance products consumers can access, thereby limiting their ability to protect themselves and their loved ones.

I strongly urge you to reconsider moving forward with the proposed rule, as it's incompatible with the distinct characteristics of our industry and jeopardizes the financial security we offer to our clients. Its implementation would not only adversely affect the livelihood of financial professionals like myself, but it would also limit consumer access in New Jersey.

Thank you for your consideration on this matter.

Sincerely,

Michael P. Haderer, CFP®

Lanoka Harbor, NJ 08734

From: Dan Linn
To: Fish, David [DOL]
Subject: [EXTERNAL] DOLWD
Date: Tuesday, July 22, 2025 1:41:28 PM
Attachments: 2025 NJ Rule Advisor Letter to DOLWD.docx

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Dan Linn | Financial Advisor | Prudential Advisors
Greater New Jersey Financial Group
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07/22/2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov

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Thank you for your consideration on this matter.

Daniel Linn

Forked River, NJ

From: Philip Gigante
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 1:52:34 PM

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Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Philip Gigante
329 Doremus ave
Newark, NJ 07105
p.gigante@bbtlogistics.com

From: Fair, Andrea [DOL]
To: Fish, David [DOL]
Subject: Mail ABC Test Rule
Date: Tuesday, July 22, 2025 2:28:30 PM
Attachments: Mail NFIB NJAC 12_11 ABC Test .pdf

Dave, please see the attached received in the mail.

Andrea Fair, Executive Assistant
New Jersey Department of Labor and Workforce Development
Office of Legal & Regulatory Services
1 John Fitch Plaza, 13th Floor Suite G
PO Box 110
Trenton, NJ 08625-0110
(609) 376-5966
Andrea.Fair@dol.nj.gov

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555 12th Street NW, Suite 1001
Washington, D.C. 20004

1-800-552-5342
NFIB.com

Via email
and U.S. First Class Mail

July 17, 2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
PO Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Dear Director Fish:

RE: Proposed New Rules: N.J.A.C. 12:11; ABC Test; Independent Contractors, Published in the New Jersey Register of May 5, 2025.

The National Federation of Independent Business (NFIB)[1] submits these comments in response to the Department of Labor and Workforce Development ("Department") proposal titled "Proposed New Rules: N.J.A.C. 12:11; ABC Test; Independent Contractors," published in the New Jersey Register of May 5, 2025.[2] For the reasons set forth below, NFIB recommends that the proposed rules be withdrawn.

The proposed rules alter the simple and flexible language of the original ABC test into a convoluted classification system, hindering the ability of small businesses to hire independent contractors. Small businesses will face an increased risk of misclassification proceedings for honest mistakes. The Department must work diligently to prevent the placement of such needless burdens upon the shoulders of small business owners.

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[1] NFIB is an incorporated nonprofit association representing small and independent businesses. NFIB protects and advances the ability of Americans to own, operate, and grow their businesses and ensures that governments of the United States and the fifty States hear the voice of small business as they formulate public policies.

[2] 57 N.J.R. 894.

The Current ABC Test

The three-prong ABC test, codified at N.J.S.A. 43:21-19(i)(6)(A), (B), and (C), provides that individuals will be considered independent contractors when:

> (A) Such individual has been and will continue to be free from control or direction over the performance of such service, both under his contract of service and in fact;
>
> (B) Such service is either outside the usual course of the business for which such service is performed, or that such service is performed outside of all the places of business of the enterprise for which such service is performed; and
>
> (C) Such individual is customarily engaged in an independently established trade, occupation, profession or business.

The proposed rules seek to greatly expand this language in a way that is unhelpful for businesses and creates significant confusion.

Changes to Prong A

In reworking Prong A of the ABC test, the proposed rules list two factors for determining what constitutes "exercising control": first, "[w]hether the individual is required to work any set hours or jobs;" and second, "[w]hether the putative employer has the right to control the details and means by which the services are performed by the individual."[3] This may seem simple enough in itself, but the second factor is broken down into nine sub-factors, and two sub-sub-factors, presenting numerous and vague requirements that make it more difficult to distinguish an independent contractor from an employee.[4]

For example, one of the sub-factors asks "[w]hether the putative employer negotiates for and acquires the services performed by the individual[.]" Is this per job or per the ongoing contract? The rule is silent. As another example, the rule asks "[w]hether the individual's rate of pay is fixed by the putative employer[.]" However, every contract for services fixes a rate of pay—a homeowner, for instance, pays a plumber to fix a sink for a set, agreed-upon fee. Does that make the plumber an employee? Surely, the Department does not mean to go that far. Yet, with this factor remaining vague, it lends itself to any number of interpretations.

A list of factors can be helpful to bring clarity, if the list is actually exhaustive and the weight of the factors is clear. However, the rule goes on to say that the factors listed are not to be used as a checklist where meeting a majority of the factors indicates independent contractor status.[5] In fact, the factors are merely "illustrative" and "not

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[3] Proposed 12:11-1.3(c)(1)-(2).
[4] Proposed 12:11-1.3(c)(2)(i)(1)-(9).
[5] Proposed 12:11-1.3(e).

exhaustive."[6] Most troubling is the Department's statement that "[s]ome factors may be relevant in one situation and may not be relevant in another."[7] This means that the Department will evaluate what "control" looks like on a case-by-case basis, based on any factors it so desires—even unlisted factors—while some of the factors listed might actually mean nothing, and the weight of the factors is entirely uncertain.

On its face, but especially when combined with the vagueness of the sub-factors, this section offers no clarity, but instead, obscures the Department's interpretation and decision-making process so that the only safe path for small businesses is to misclassify independent contractors as employees.

This seems to be the point. Part (f) of 12:11-1.3 states that this measure of control still applies to actions the business is exercising in compliance with the law. Businesses will thus have to choose between 1) exercising control over independent contractors in compliance with the law, risking misclassification proceedings in doing so; 2) breaking the law in order to save the independent contractor's status; or 3) hiring all of their contractors as employees to be on the safe side. This is no choice at all. The Department must not make small businesses pick between safety and legal compliance on one hand, and a misclassification proceeding on the other. This pits the laws of the State against each other and stacks the deck against independent contractors.

The Department should be mindful that the New Jersey Supreme Court in *Carpet Remnant Warehouse, Inc. v. New Jersey Department of Labor* ("*CRW*") did not give the Department as much leeway with Prong A as it supposes: "the doctrine of control is derived from the common law and is therefore 'not inextricably related to the [Commissioner's] expertise[.]'"[8] Though the court also said "that a statutory employer-employee relationship [may] be found even though that relationship may not satisfy common-law principles,"[9] this was in reference to the three prongs taken together—Prong A operates under the common law's significantly narrower understanding of "control."[10]

Changes to Prong B

Instead of introducing a list of factors to the test, as with Prongs A and C, the proposed changes to Prong B come in the form of examples. However, these examples are vague and noncommittal, creating a great deal of confusion for small businesses.

For instance, the proposed rule never commits to saying whether even its own examples are clear-cut cases. In one example, dealing with a cleaning person working at a dentist's office, the most the rule can muster is that "[t]he services performed by the

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[6] Proposed 12:11-1.3(c)(2)(i).
[7] Proposed 12:11-1.3(e).
[8] 125 N.J. 567, 590 (1991).
[9] *Id.* at 581.
[10] *See Restatement of Agency* § 220 (1933).

cleaning person are *likely* outside of the dentist's usual course of business[.]"[11] Likewise for the musician playing at a restaurant—it is only "likely" that this is outside of the usual course of business,[12] and even for a landscaper at a law firm, the only certainty we have is that it is "likely."[13] As the saying goes, "'almost' only counts in horseshoes." In the law, "likely" counts for nothing. Businesses need clarity. If the examples just mentioned—which are indeed clear-cut cases—can't even be categorically stated as meeting Prong B, then what certainty can any regulated party have that they are correctly applying the test?

Further, the distinctions raise more questions than they answer due to the absence of explanations. A caddie helping patrons play golf at a country club is "likely" within the usual course of business,[14] but a musician entertaining patrons at a restaurant is "likely" outside of it.[15] Why? The rule provides no rationale. Businesses are left to fill in the blanks themselves. If they can't figure out the distinction, they will either guess wrong, or refuse to guess, and classify contractors as employees. If the Department truly does value "more workers being properly classified (either as employees or independent contractors),"[16] then this result should be unacceptable.

Changes to Prong C

The proposed rules likewise distort the meaning of Prong C, which asks whether a worker is "customarily engaged in an independently established . . . business[.]"[17] By a plain reading of the text, this could be a straightforward inquiry. However, as with Prongs A and B, the proposed rules add yet another vague list of factors. Though these factors are lifted from the *CDW* case, the Department does not clarify what they mean and how they factor into the analysis. These factors are:

1. The duration, strength, and viability of the individual's business (independent of the putative employer);

2. The number of customers of the individual's business and the volume of business from each respective customer;

3. The amount of remuneration the individual receives from the putative employer compared to the amount of remuneration the individual receives from others in the same industry;

4. The number of employees of the individual's business;

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[11] Proposed 12:11-1.4(c)(1).
[12] Proposed 12:11-1.4(c)(2).
[13] Proposed 12:11-1.4(c)(3).
[14] Proposed 12:11-1.4(d)(3).
[15] Proposed 12:11-1.4(c)(2).
[16] 57 N.J.R. 897.
[17] N.J.S.A. 43:21-19(i)(6)(C).

5. The extent of the individual's investment in their own tools, equipment, vehicles, buildings, infrastructure, and other resources;

6. Whether the individual sets their own rate of pay; and

7. Whether the individual advertises, maintains a visible business location, and is available to work in the relevant market.[18]

To start, the first factor is vague—what, indeed, is a durable, strong, and viable business, and how is another business who contracts with it to make that judgment? The same goes for many of the other factors. What number of customers would make a business sufficiently "independently established"? What percentage of renumeration coming from which sources would meet this threshold? How many employees does it take—keeping in mind that many small businesses, including NFIB members, have zero or even just one employee—to make a business "independent" under the rule?

The rule provides no answers to these questions, and instead reiterates, as above, that the many listed factors are not to be used as a checklist, presenting serious issues of arbitrariness, vagueness, and confusion.[19]

Further, this list improperly considers factors that are entirely up to the contractor. Indeed, the rule states that "what is relevant is not whether an individual was free to work for others," but instead "whether the individual did perform services for, and receive remuneration for the performance of such services from others[.]"[20] A business has no control over (and indeed, may have no knowledge of) these insider details of a contractor's business. Nor is an independent contractor likely to disclose these details to every business with which he or she contracts. In the absence of this information, small businesses will be forced to throw up their hands and misclassify contractors as employees.

The rule makes clear, in no uncertain terms, that even if a business can prove that its contractor has other clients, thus navigating through the central element of Prong C,[21] these relationships may still be mislabeled as employer-employee and put the business back at square one: "An individual having multiple employers does not equate to an individual having an independently established trade, occupation, profession, or business sufficient to meet Prong C."[22] So even if someone could be defined as a contractor under Prong C, if *any other* work relationship the contractor has is defined as an employment relationship, it cuts against them on Prong C. This is convoluted and requires endless evaluations of every single business relationship a contractor may

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[18] Proposed 12:11-1.5(b)(1)-(7).
[19] *See* Proposed 12:11-1.5(d).
[20] Proposed 12:11-1.5(e).
[21] *See* Proposed 12:11-1.5(e).
[22] Proposed 12:11-1.5(f)(1).

have. It would be inadvisable—not to mention impossible—for a small business to conduct such inquiries just to ensure that they are correctly applying the rules.

The proposed rules also warp the explicit statutory language and court precedent surrounding Prong C. As the proposed rules have it:

> The fact that an individual would not qualify for receipt of unemployment compensation benefits based on their earnings is not relevant to the question of whether such individual is an independent contractor pursuant to the ABC test.[23]

But the New Jersey Supreme Court in *East Bay Drywall, LLC v. Department of Labor and Workforce Development* ("*EBD*") stated the opposite: "[t]he Legislature made clear that the public policy underpinning the UCL[,]"—namely, to remedy "'economic insecurity due to unemployment'"—"*must* be considered when determining its application[.]" [24] The word "must" means that this consideration is mandatory. To instead claim that unemployment is not even relevant is to blatantly violate the statute and case law.

<u>The Proposed Rules Give Short Shrift to Agreements and Forms</u>

Finally, the rules downplay probative evidence found in contracts and official filings, which should be critical in determining independent contractor status under Prongs A and C.

The text of the ABC statute requires the contract to serve as strong evidence of independent contractor status. Prong A evaluates control "*both* under [the] contract of service and in fact."[25] Yet, the proposed rules diminish this clear statement by refusing to give weight to independent contractor agreements as written, instead finding ways to undermine their terms.

Under Proposed 12:11-1.6(c), an express agreement to be classified as an independent contractor is not dispositive, and indeed, is subject to yet another list of factors that will be difficult to apply in practice.[26] One such factor is "whether either the putative employer or the individual is the primary or unilateral drafter of the alleged independent contractor agreement[.]"[27] Under this factor, a business may draft an agreement, the contractor may offer edits, reaching a true meeting of the minds essential to any contract, and yet, because the business wrote the first draft, he or she is the "primary drafter," and the agreement should be given less weight. This means that an agreement between a business and a worker—who are both contracting in good faith to create an independent contractor relationship—can't be given full weight unless the contractor

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[23] Proposed 12:11-1.6(d).
[24] 251 N.J. 477, 500 (2022) (quoting N.J.S.A. § 43:21- 2) (emphasis added).
[25] N.J.S.A. 43:21-19(i)(6)(A).
[26] Proposed 12:11-1.6(c).
[27] Proposed 12:11-1.6(c)(1).

primarily drafts the contract. Practically speaking, this is unworkable and unnecessarily interferes with both parties' freedom to contract.

The same diminishing of relevant evidence is applied to Prong C. Proposed 12:11-1.6 establishes that a business's use of a Federal Form 1099 for a particular worker does not satisfy the ABC test.[28] Additionally, "[p]roof of business registration . . . is not alone sufficient to meet Prong C."[29] Though the filing of a 1099 and proof of business registration are not *dispositive* even under the current test, they are and should be considered *relevant* evidence. Indeed, the existence of a separate business entity or the filing of a 1099 are not even included on the lists of factors the Department will use to meet Prong C.[30] In other words, the Department will consider the evidence gleaned from the proposed rules' countless lists, but will disregard evidence of a contractor owning his or her own business and the practice of the parties via the filing of a 1099.[31]

Though the Department leans on the New Jersey Supreme Court's decision in *CRW* for support, it does so by making much of a short comment. As the court in that case had it, a classification determination "is fact-sensitive, requiring an evaluation in each case of the substance, not the form, of the relationship[.]"[32] But it does not go further than this. To support this statement, the court cites *Provident Inst. for Sav. In Jersey City v. Div. of Emp. Sec., Dep't of Lab. & Indus.*, where the court never said that it would disregard form, but rather would "look *through* the form to the substance."[33] To look through the form is not to disregard or downplay its importance, but to get a full picture in context. This merely means that the form itself should not be the end of the inquiry. Instead, if the substance of the relationship (i.e. the practice of the parties) lines up with the form (e.g., contracts, 1099s, the filing of business registration documents), both should be considered as beneficial evidence. Anything less cuts the statutory Prong A in half, severely distorting the text of the statute.

The Department's proposed rules tip the scales against contractor relationships by favoring evidence that is vague and gravitates towards an employer-employee relationship, and devaluing evidence that is more objective and thus would more clearly support independent contractor status. This is arbitrary, capricious, and violates the ABC statute.

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[28] Proposed 12:11-1.6(b).
[29] Proposed 12:11-1.5(g).
[30] See Proposed 12:11-1.5(b).
[31] *See* 57 N.J.R. 896-97.
[32] *CRW*, 125 N.J. at 581.
[33] 32 N.J. 585, 591 (1960) (emphasis added). See also *Trauma Nurses, Inc. v. Bd. of Rev., New Jersey Dep't of Lab.*, 242 N.J. Super. 135, 142 (App. Div. 1990) ("[W]e are obliged to look *behind* the contractual language to the actual situation.") (emphasis added).

NFIB's Recommendation

Though the Department claims that the proposed rules will mitigate confusion for businesses, with economic benefits flowing from this new clarity, they actually will result in significantly more confusion with the introduction of unnecessary (and non-exhaustive) lists.[34] The Department states that its goal is "workers being properly classified," without prejudice to whether that results in more employees or independent contractors,[35] yet, the confusion sown by the new rules will end in the pervasive misclassification of independent contractors as employees to avoid potential liability. To avoid this result, NFIB recommends that the proposed rules be withdrawn in their entirety.

Conclusion

NFIB appreciates the opportunity to comment upon the proposed rules and hopes that the Department will take seriously its obligation to provide clarity and stability for New Jersey's small businesses. Withdrawing the proposed rules will be a strong step towards that goal.

Sincerely,

Elizabeth A. Milito, Esq.
Vice President and Executive Director,
NFIB Small Business Legal Center

cc: Eileen Kean, New Jersey State Director, NFIB

---

[34] *See* 57 N.J.R. 897.
[35] *See Id.*

From: Atul C Shah
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed New Rules: N.J.A.C. 12:11, ABC Test Re:; Independent Contractors
Date: Tuesday, July 22, 2025 2:33:07 PM
Attachments: image001.png

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David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov
Proposed New Rules: N.J.A.C. 12:11
ABC Test Re:; Independent Contractors

Dear Mr. Fish,
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Thank you for your consideration on this matter.

Atul Shah

Atul C. Shah | Financial Professional | Prudential Advisors
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From: Konrad Kudyba
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 2:41:46 PM

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Dear Mr. Fish,

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We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Konrad Kudyba
166 Manor st
South Amboy, NJ 08879
Kudyba31@gmail.com

From:	Nunzio Martucci
To:	Fish, David [DOL]
Subject:	[EXTERNAL] 2025 NJ Rule Advisor Letter to DOLWD.docx
Date:	Tuesday, July 22, 2025 3:08:37 PM
Attachments:	image003.png image004.png 2025 NJ Rule Advisor Letter to DOLWD.docx

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Nunzio M. Martucci, CFP®, RICP®
Financial Planner
AR License # 16120980
CA License # 4465781
Northwestern Hills Financial Group

Prudential Advisors
256 South Livingston Ave, Livingston, NJ, 07039
Office 973-436-0775 | Fax 973-597-9701 | Cell 973-204-6345
Nunzio.Martucci@Prudential.com
https://www.prudential.com/advisor/nunzio-martucci

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07/22/2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov

Re: Proposed New Rules: N.J.A.C. 12:11
ABC Test; Independent Contractors

Dear Mr. Fish,

I am writing you today to express my deep concerns over the proposed rule (N.J.A.C. 12:11) that could reclassify independent contractors like me as employees.

As an agent in New Jersey, I am subject to significant licensing, continuing education, and regulatory oversight that do not apply to many other industries. We are not the type of workers this rule is intended to protect—and yet, under its current framing, many of us could be forced into employment structures that don't fit the nature of our work. It would be highly disruptive to our industry and would limit the availability of important financial products we provide to families across New Jersey.

Licensed insurance and financial professionals have an established, successful history of appropriate classification as independent contractors and are not involved in the worker classification problems found in other industries. The majority of industry agents work as independent contractors and wish to continue doing so.

Most importantly, failure to exempt independent insurance producers and financial advisors from the DOLWD proposal severely limits the scope of insurance products consumers can access, thereby limiting their ability to protect themselves and their loved ones.

I strongly urge you to reconsider moving forward with the proposed rule, as it's incompatible with the distinct characteristics of our industry and jeopardizes the financial security we offer to our clients. Its implementation would not only adversely affect the livelihood of financial professionals like myself, but it would also limit consumer access in New Jersey.

Thank you for your consideration on this matter.

Nunzio Martucci,

Livingston NJ 07039

From: Alberto Alves
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed New Rules: N.J.A.C. 12:11 - Independent Contractors.
Date: Tuesday, July 22, 2025 3:53:50 PM
Attachments: Outlook-grxx4trm.png

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Thank you for your consideration on this matter.

Alberto Alves

Newark, NJ

Alberto L. Alves, LUTCF® | Financial Professional | Prudential Advisors
Greater Metro Financial Group
88 Pacific Street, Newark, NJ 07105
T 973-344-5554 | F 973-817-7670 | alberto.alves@prudential.com

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From: Barbara Bauer
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 6:18:34 PM

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Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Barbara Bauer
18 Larch st
Carteret, NJ 07008
bbkb10@comcast.net

From: Victor Gonzalez
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 6:18:36 PM

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Yours sincerely,
Victor Gonzalez
11 Wilson Ave
, 07462
Vicgonz711@yahoo.com

From: Iwona Grabowski
To: Fish, David [DOL]
Subject: [EXTERNAL] My voice
Date: Tuesday, July 22, 2025 6:22:06 PM
Attachments: image001.png
2025 NJ Rule Advisor Letter to DOLWD.docx

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Please see attachment...

Iwona Grabowski
Financial Advisor

Prudential Advisors
110 Allen Rd,2nd Fl Basking Ridge NJ 07920
C 908 705 6416 O 908 731 4112 F 877 840 7179
iwona.grabowski@prudential.com

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July 22, 2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov

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ABC Test; Independent Contractors

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Thank you for your consideration on this matter.

Iwona Grabowski

Basking Ridge, NJ

From: Adam Gonzalez
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 7:14:38 PM

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Yours sincerely,
Adam Gonzalez
12 heritage ln Hamburg nj
Hamburg, NJ 07419
Gonzalezfam12@yahoo.com

From: Laura Peticca
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Tuesday, July 22, 2025 7:40:35 PM

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Yours sincerely,
Laura Peticca
149 East Cherry Street
Carteret, NJ 07008
LPETIC@AOL.COM

From: Eric Levens
To: Fish, David [DOL]
Subject: [EXTERNAL] Re: Proposed New Rules: N.J.A.C. 12:11 ABC Test; Independent Contractors
Date: Tuesday, July 22, 2025 7:50:49 PM
Attachments: image001.png
Importance: High

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Thank you for your consideration on this matter,

Prudential

Eric R. Levens | Financial Planner | Prudential Advisors
CA Insurance License Number 0K06416
330 Changebridge Road, Suite 101, Pinebrook, NJ 07058
11 Sunflower Avenue, Paramus, NJ 07652

From:	Michael Kachur
To:	Fish, David [DOL]
Cc:	William Witt; Marguerite Kachur
Subject:	[EXTERNAL] NJ consideration letter
Date:	Wednesday, July 23, 2025 11:55:43 AM
Attachments:	image001.png 2025 NJ Rule Advisor Letter to DOLWD.docx

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David,
Please see attached.

Prudential

Michael Kachur | Financial Professional | Prudential Advisors
Greater New Jersey Financial Group
1504 Blackwood Clementon Road
Blackwood, NJ 08012
(O) 856-637-2226 | (F) 856-637-2228 | (c) 856-465-1050
Michael.kachur@prudential.com

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July 23, 2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov

Re: Proposed New Rules: N.J.A.C. 12:11
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Thank you for your consideration on this matter.

Michael Kachur- NJ License # 1088133

856-465-1050

1504 Blackwood Clementon Rd

Blackwood NJ 08012

From: Eddie Lee
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed New Rules : 12:11
Date: Wednesday, July 23, 2025 12:44:58 PM
Attachments: image001.png
NJAC1211.pdf

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Eddie Lee | Financial Professional | Prudential Advisors
CA Insurance License #0H50757
Annuities Masters Council- Platinum Level
1 Tower Center, 16th floor, East Brunswick, NJ 08816
T 732-645-4627 | F 877-840-7824 | C 646-256-3088
Eddie.lee@prudential.com

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David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov

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Thank you for your consideration on this matter.

Eddie Lee

Morganville, NJ

From: Eric Richard
To: Fish, David [DOL]
Subject: [EXTERNAL] Letter to David Fish Public Comment IC
Date: Wednesday, July 23, 2025 1:40:16 PM
Attachments: Letter to David Fish - Pubic Comment IC.pdf

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David – Please see the attached public comment for the ABC test proposed regulation. Please confirm receipt.

Thanks,

Eric Richard
Legislative Director
NJ AFL-CIO

NEW JERSEY STATE AFL-CIO
106 West State Street
Trenton, New Jersey 08608
(609) 989-8730
FAX (609) 989-8734
www.njaflcio.org

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HARVEY WHILLE
DEBBIE WHITE

July 23, 2025

David Fish
Legal and Regulatory Services
Department of Labor and Workforce Development
POB 110, 13th Floor
Trenton, NJ 08625-0110

Delivered via e-mail to: david.fish@dol.nj.gov

Dear Mr. Fish:

Re: New Jersey State AFL-CIO Public Comment in Support of Adoption of Proposed New Rule: NJAC 12:11: ABC Test – Independent Contractors

The New Jersey State AFL-CIO submits these written comments to supplement our verbal testimony delivered on June 23, 2025, by our Legislative Affairs Director Eric Richard in support of these proposed rules. We thank the Department of Labor and Workforce Development for their continued work on addressing the problem of the misclassification of workers as independent contractors.

We commend the Murphy Administration for the work they have done on misclassification over the past seven and a half years. From the creation of the task force and subsequent report that laid out a roadmap for reform, to the passage of numerous pieces of legislation, to high profile enforcement actions, to the public awareness campaign that has been implemented, to the submission of this proposed rule, New Jersey has shown itself to be a leader on this issue for employers that play by the rules and the workers that are employed by them.

Despite the significant amount of work done to address the misclassification of workers as independent contractors, certain industries continue to see widespread, rampant, intentional misclassification. For this reason, the job is far from over. Heightened enforcement by the State Department of Labor and Workforce Development is essential and the adoption of these rules are important steps that should be approved to accomplish this.

The proposed rules need to be adopted for the benefit of both employers and employees, so there is a clear understanding of the ABC test and so all parties can be in compliance. That's exactly what this proposal seeks to accomplish.

The New Jersey State AFL-CIO has no issue with legitimate independent contractors, and we understand the benefit this status brings to certain professionals. However, intentional misclassification, simply for the benefit of employer's profit margins, at the expense of workers – is unacceptable.

Workers that are misclassified lose access to numerous pro-worker benefits, including unemployment insurance, overtime, minimum wage, paid sick days, paid family leave, worker compensation, among others. And because independent contractors are outside the NLRA, these workers have their right to join a union stripped away from them. And when workers lose these benefits, the business that employ them see a windfall of "savings" by not having to pay the associated taxes.

Critics often state that the flexibility of hours and work schedule afforded to workers by independent contractor status would be eliminated if these rules are adopted. That simply is not true. Workers can perform the same exact jobs they currently are performing – including app-based delivery and transportation services – when classified as an employee. There is no prohibition of a worker holding multiple part-time jobs with several companies, performing the same work they do as independent contractors, but filing a W-2 as an employee rather than a 1099 as an independent contractor.

These proposed rules do not create any new laws, nor do they expand the application of the existing law. The ABC test was first established in 1942, and this proposed rule does not alter the law in any way. They are merely enforcing what the legislature and the courts have already approved. The State Supreme Court has repeatedly ruled in support of the ABC test and has affirmed that all three branches of the test must be achieved to properly classify a worker as a legitimate independent contractor. The rules being proposed are a product of these rulings by the court, which required the Department of Labor and Workforce Development to issue them.

The various businesses and interest groups that are opposed to these rules need to recognize that the changes they seek can only be accomplished by the Legislature or the courts. For that reason, they should petition those lawmaking and statute interpretation bodies rather than lobbying the Department of Labor and Workforce Development to skirt their enforcement responsibilities. The department is simply doing their jobs as instructed by the court and lawmakers.

Thank you for your consideration of our position on this issue and we strongly support the adoption of these proposed rules in their entirety and without changes.

Sincerely,

Charlie

Charles Wowkanech
President

Laurel

Laurel Brennan
Secretary-Treasurer

CW:LB:jmn
OPEIU:153

From: Sanford osofsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 23, 2025 2:26:36 PM

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Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Sanford osofsky
16 Mendell Avenue, Cranford, NJ, USA
Cranford, NJ 07016
sando16@verizon.net

From:	Crescitelli, Louis on behalf of Fantasia, Asw. D.O.
To:	Fish, David [DOL]
Cc:	Grilo, Timothy [DOL]; Briggs, Jonathan [DOL]; Tamayo-Espinosa, Nataly [DOL]
Subject:	[EXTERNAL] PRN 2025-051 – ABC Test; Independent Contractors
Date:	Wednesday, July 23, 2025 3:06:50 PM
Attachments:	image001.png image002.png image003.png LD-24 Letter Commissioner Asaro-Angeo DOLWD Rules IC 2025-07-23.pdf

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For the Department's consideration.

Thank you.

Lou

Louis Crescitelli III, Chief of Staff
Assemblywoman Dawn Fantasia
Legislative District 24 Office of Space, Fantasia & Inganamort
1 Wilson Drive, Suite 2B
Sparta, New Jersey 07871
973-300-0200 Phone
973-300-1744 Fax
AswFantasia@njleg.org
LCrescitelli@njleg.org

NEW JERSEY LEGISLATURE
LEGISLATIVE OFFICES
24TH DISTRICT
SUSSEX - MORRIS - WARREN

PARKER SPACE
SENATOR
SenSpace@njleg.org

DAWN FANTASIA
ASSEMBLYWOMAN
AswFantasia@njleg.org

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ASSEMBLYMAN
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(973) 300-0200
FAX (973) 300-1744

facebook.com/nj24th

July 23, 2025

Commissioner Robert Asaro-Angelo
New Jersey Department of Labor & Workforce Development
PO Box 110
Trenton, New Jersey 08625-0110

Re: PRN 2025-051 – ABC Test; Independent Contractors

Dear Commissioner Asaro-Angelo:

We are writing to express our strong opposition to the proposed regulations concerning the application of the "ABC Test" to independent contractors. We respectfully urge that this proposal be withdrawn in its entirety.

This regulatory action represents a clear attempt to bypass the legislature, given that similar legislation has repeatedly failed to advance due to widespread opposition from independent contractors, small business owners, and the communities they serve. The overwhelming rejection of these measures should serve as a clear signal that New Jerseyans will not tolerate policies that jeopardize their livelihoods and economic freedom.

Independent contracting is not merely a business model—it is a lifeline for thousands of New Jersey residents. Many independent contractors are parents who rely on the flexibility of freelance work to balance raising their children with earning a living. Curtailing their ability to operate independently would devastate families, strain our already overburdened childcare system, and discourage couples from starting or expanding their families.

Beyond the human impact, these rules would effectively eliminate the ability for individuals to work as independent contractors in New Jersey. Such a drastic measure would reverberate throughout our economy, disrupting our supply chains, transportation networks, and countless other sectors that depend on these flexible working arrangements. The damage to small businesses and self-employed individuals alike would be profound, undercutting the diverse economic fabric that sustains our state.

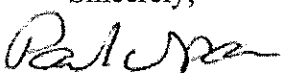
We fully support efforts to combat bad actors who engage in worker misclassification or evade taxes and wages. In fact, we and prior legislators from this district have supported legislative measures that provided your Department with additional enforcement tools to hold such violators accountable. However, this proposal goes far beyond addressing abuse—it is regulatory overreach that punishes legitimate businesses and workers rather than targeting those who deliberately break the law.

For these reasons, we urge the Department to withdraw PRN 2025-051 and work with the legislature to craft balanced solutions that protect workers without dismantling an essential component of New Jersey's workforce.

Thank you again.

Sincerely,

Dawn Fantasia
Assemblywoman



Parker Space
Senator

Michael Inganamort
Assemblyman

FPS/DF/MI/lc

From: Bryan Blutstein
To: Fish, David [DOL]
Subject: [EXTERNAL] Re: Proposed New Rules: N.J.A.C. 12:11
Date: Wednesday, July 23, 2025 3:20:49 PM

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July 23, 2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov
Re: Proposed New Rules: N.J.A.C. 12:11
ABC Test; Independent Contractors

Dear Mr. Fish,

I am writing you today to express my deep concerns over the proposed rule (N.J.A.C. 12:11) that could reclassify independent contractors like me as employees.
As an agent in New Jersey, I am subject to significant licensing, continuing education, and regulatory oversight that do not apply to many other industries. We are not the type of workers this rule is intended to protect—and yet, under its current framing, many of us could be forced into employment structures that don't fit the nature of our work. It would be highly disruptive to our industry and would limit the availability of important financial products we provide to families across New Jersey.
Licensed insurance and financial professionals have an established, successful history of appropriate classification as independent contractors and are not involved in the worker classification problems found in other industries. The majority of industry agents work as independent contractors and wish to continue doing so.
Most importantly, failure to exempt independent insurance producers and financial advisors from the DOLWD proposal severely limits the scope of insurance products consumers can access, thereby limiting their ability to protect themselves and their loved ones.
I strongly urge you to reconsider moving forward with the proposed rule, as it's incompatible with the distinct characteristics of our industry and jeopardizes the financial security we offer to our clients. Its implementation would not only adversely affect the livelihood of financial professionals like myself, but it would also limit consumer access in New Jersey.

Thank you for your consideration on this matter.

Bryan Blutstein CFP®
Matawan, New Jersey

Bryan T. Blutstein CFP® | Financial Planner | Prudential Advisors
347-I Matawan Rd. Matawan, NJ 07747
732-970-6480 | 732-970-6477 | Bryan.Blutstein@prudential.com
Prudential.com/advisor/Bryan-Blutstein

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From:	Grilo, Timothy [DOL]
To:	Asaro-Angelo, Robert [DOL]; Diaz, Julie [DOL]; Marich, Michael [DOL]; Fish, David [DOL]
Cc:	Briggs, Jonathan [DOL]; Cassese, Jason [DOL]
Subject:	Fw: PRN 2025-051 – ABC Test; Independent Contractors
Date:	Wednesday, July 23, 2025 3:21:25 PM
Attachments:	image001.png image002.png image003.png LD-24 Letter Commissioner Asaro-Angeo DOLWD Rules IC 2025-07-23.pdf

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Attached is more incoming on the ABC rule proposal ...this is LD 24, Space, Fantasia, and Inganamort

Timothy Grilo
Director of Legislative and Intergovernmental Affairs
New Jersey Department of Labor and Workforce Development
timothy.grilo@dol.nj.gov

From: Crescitelli, Louis <LCrescitelli@njleg.org> on behalf of Fantasia, Asw. D.O. <AswFantasia@njleg.org>
Sent: Wednesday, July 23, 2025 3:06 PM
To: Fish, David [DOL] <David.Fish@dol.nj.gov>
Cc: Grilo, Timothy [DOL] <Timothy.Grilo@dol.nj.gov>; Briggs, Jonathan [DOL] <Jonathan.Briggs@dol.nj.gov>; Tamayo-Espinosa, Nataly [DOL] <Nataly.Tamayo-Espinosa@dol.nj.gov>
Subject: [EXTERNAL] PRN 2025-051 – ABC Test; Independent Contractors

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For the Department's consideration.

Thank you.

Lou

Louis Crescitelli III, Chief of Staff
Assemblywoman Dawn Fantasia
Legislative District 24 Office of Space, Fantasia & Inganamort
1 Wilson Drive, Suite 2B

From: Briggs, Jonathan [DOL]
To: Asaro-Angelo, Robert [DOL]; Diaz, Julie [DOL]; Marich, Michael [DOL]; White, Keith [DOL]; Fish, David [DOL]
Cc: Grilo, Timothy [DOL]; Snyder, Carleen [DOL]; Cruz, Gladys [DOL]; Cassese, Jason [DOL]
Subject: FW: PRN 2025-051 – ABC Test; Independent Contractors
Date: Wednesday, July 23, 2025 3:22:05 PM
Attachments: image001.png
image002.png
image003.png
LD-24 Letter Commissioner Asaro-Angeo DOLWD Rules IC 2025-07-23.pdf

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Good afternoon,

Please see the attached letter from LD 24 expressing opposition to the ABC Test regulations.

Please let us know if there are questions or anything needed from LIA at this time.

Thank you.

From: Crescitelli, Louis <LCrescitelli@njleg.org> **On Behalf Of** Fantasia, Asw. D.O.
Sent: Wednesday, July 23, 2025 3:06 PM
To: Fish, David [DOL] <David.Fish@dol.nj.gov>
Cc: Grilo, Timothy [DOL] <Timothy.Grilo@dol.nj.gov>; Briggs, Jonathan [DOL] <Jonathan.Briggs@dol.nj.gov>; Tamayo-Espinosa, Nataly [DOL] <Nataly.Tamayo-Espinosa@dol.nj.gov>
Subject: [EXTERNAL] PRN 2025-051 – ABC Test; Independent Contractors

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For the Department's consideration.

Thank you.

Lou

Louis Crescitelli III, Chief of Staff
Assemblywoman Dawn Fantasia
Legislative District 24 Office of Space, Fantasia & Inganamort
1 Wilson Drive, Suite 2B
Sparta, New Jersey 07871
973-300-0200 Phone

From: Chris Conant
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 23, 2025 4:01:34 PM

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Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Chris Conant
116 Talmadge Rd
Edison, NJ 08817
finance@cambrias.com

From: Dennis Beaumont
To: Fish, David [DOL]
Subject: [EXTERNAL] proposed new rules N.J,A.C. 12:11
Date: Wednesday, July 23, 2025 4:42:47 PM
Attachments: image001.png
NJAC 12 11 proposal.pdf

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David,

See attached.

Dennis Beaumont | Financial Professional | Prudential Advisors
22 Coates Street, 2D Medford, NJ 08055
Cell 215-852-3592 | 215-815-8822 | dennis.beaumont@prudential.com

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07-23-2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov

Re: Proposed New Rules: N.J.A.C. 12:11
ABC Test; Independent Contractors

Dear Mr. Fish,

I am writing you today to express my deep concerns over the proposed rule (N.J.A.C. 12:11) that could reclassify independent contractors like me as employees.

As an agent in New Jersey, I am subject to significant licensing, continuing education, and regulatory oversight that do not apply to many other industries. We are not the type of workers this rule is intended to protect—and yet, under its current framing, many of us could be forced into employment structures that don't fit the nature of our work. It would be highly disruptive to our industry and would limit the availability of important financial products we provide to families across New Jersey.

Licensed insurance and financial professionals have an established, successful history of appropriate classification as independent contractors and are not involved in the worker classification problems found in other industries. The majority of industry agents work as independent contractors and wish to continue doing so.

Most importantly, failure to exempt independent insurance producers and financial advisors from the DOLWD proposal severely limits the scope of insurance products consumers can access, thereby limiting their ability to protect themselves and their loved ones.

I strongly urge you to reconsider moving forward with the proposed rule, as it's incompatible with the distinct characteristics of our industry and jeopardizes the financial security we offer to our clients. Its implementation would not only adversely affect the livelihood of financial professionals like myself, but it would also limit consumer access in New Jersey.

Thank you for your consideration on this matter.

Dennis Beaumont

Medford, NJ

From: Jerry Butler
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 23, 2025 5:21:32 PM

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Dear Mr. Fish,

[I strongly urge the NJDOL not to reclassify independent workers. This attack by the NJDOL will further weaken NJ and indeed threaten the very survival of hundreds of thousands of NJ workers. These workers need your help not your ridicule and authoritarianism. Fact socialism has failed every place it's been tried and killed millions of people. Fact no state has ever taxed their way to prosperity. Hospitalsure stands ready to insure every one of these workers with the best health insurance in the world not tied to employment and based 100% in the free market. Hospitalsure is 100% universal. Again, reject all this insanity and protect independent workers and the entire state of NJ with Hospitalsure and their freedom to work as they see fit. Embrace subsidiarity.

Yours sincerely,
Jerry Butler
9 Murphy Circle
Florham Park, NJ 07932
jerrybutler@teleplexus.com

From: Nicholas Photiadis
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Wednesday, July 23, 2025 5:40:10 PM

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Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Nicholas Photiadis
4 Paris Ave
Rockleigh, NJ 07647
familyngp@gmail.com

From: Sanford osofsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 23, 2025 9:17:35 PM

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Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Sanford osofsky
16 Mendell Avenue, Cranford, NJ, USA
Cranford, NJ 07016
sando16@verizon.net

From: Sanford osofsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Wednesday, July 23, 2025 9:18:34 PM

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Dear Mr. Fish,

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Sanford osofsky
16 Mendell Avenue, Cranford, NJ, USA
Cranford, NJ 07016
sando16@verizon.net

From:	Brian.K Lee
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Concerns over Proposed New Rule (N.J.A.C 12:11)
Date:	Thursday, July 24, 2025 8:18:51 AM
Attachments:	image001.png image002.png image003.png image004.png

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7/24/2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov
Re: Proposed New Rules: N.J.A.C. 12:11
ABC Test; Independent Contractors

Dear Mr. Fish,

I am writing you today to express my deep concerns over the proposed rule (N.J.A.C. 12:11) that could reclassify independent contractors like me as employees.
As an agent in New Jersey, I am subject to significant licensing, continuing education, and regulatory oversight that do not apply to many other industries. We are not the type of workers this rule is intended to protect—and yet, under its current framing, many of us could be forced into employment structures that don't fit the nature of our work. It would be highly disruptive to our industry and would limit the availability of important financial products we provide to families across New Jersey.
Licensed insurance and financial professionals have an established, successful history of appropriate classification as independent contractors and are not involved in the worker classification problems found in other industries. The majority of industry agents work as independent contractors and wish to continue doing so.

Most importantly, failure to exempt independent insurance producers and financial advisors from the DOLWD proposal severely limits the scope of insurance products consumers can access, thereby limiting their ability to protect themselves and their loved ones.
I strongly urge you to reconsider moving forward with the proposed rule, as it's incompatible with the distinct characteristics of our industry and jeopardizes the financial security we offer to our clients. Its implementation would not only adversely affect the livelihood of financial professionals like myself, but it would also limit consumer access in New Jersey.
Thank you for your consideration on this matter.

Brian K. Lee
Basking Ridge, NJ

Brian K. Lee, MBA | Financial Advisor | Prudential Advisors
110 Allen Road, 2nd Floor, Basking Ridge, NJ 07920
Office 973 637-5980 | Mobile 917 767-2040 | Fax 877 840-7179 |
brian.k.lee@prudential.com

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From: Nina Benton
To: Fish, David [DOL]
Subject: [EXTERNAL] Concerns over Proposed Rule on Independent Contractors in NJ
Date: Thursday, July 24, 2025 8:59:31 AM
Attachments: image002.png

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7/24/2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov
Re: Proposed New Rules: N.J.A.C. 12:11
ABC Test; Independent Contractors

Dear Mr. Fish,

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Most importantly, failure to exempt independent insurance producers and financial advisors from the DOLWD proposal severely limits the scope of insurance products consumers can access, thereby limiting their ability to protect themselves and their loved ones.
I strongly urge you to reconsider moving forward with the proposed rule, as it's incompatible with the distinct characteristics of our industry and jeopardizes the financial security we offer to our clients. Its implementation would not only adversely affect the livelihood of financial professionals like myself, but it would also limit consumer access in New Jersey.

Thank you for your consideration on this matter.

Nina Benton

Gillette, NJ

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Financial Planner | CA Insurance License #4398535

30 Technology Drive | Suite 1Q | Warren, NJ 07059
Tel: 800-549-6007 | Fax: 732-549-6646 | cfs-nj.com

RICP conferred by The American College

nina.benton@prudential.com

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From: Mark Walters
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 11:00:10 AM

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Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Mark Walters
21 Bridge St
Chatham, NJ 07928
mark.z.walters@lpl.com

From: Greta C
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors
Date: Thursday, July 24, 2025 11:26:01 AM

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Report Suspicious

To: David Fish, New Jersey Department of Labor & Workforce Development

Submitted via email to: david.fish@dol.nj.gov on July 24th, 2025

Dear Mr. Fish,

I am writing in opposition to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors. I urge the Department to withdraw this proposal in full.

My name is Greta Chinnadurai and I live in Denville, NJ. I have been a freelance graphic designer since 2003. I became one after 15 years in a corporate environment. I needed the freedom to make my own hours after I had my children as my husband worked full time and we did not have family in the area. This allowed me to work only a few days a week, take off for school vacations and still form a good relationship with my children. When my children could no longer be in daycare but were too young to be home after school by themselves there was even more of an incentive to work from home. Do you realize how hard it is to find summer programs, Christmas programs, the myriad of school holidays? As well as the expense it is for young families? But I love my work and being an Independent contractor gave me the freedom to do both.

Now after my children have graduated college being an Independent contractor allows me to help my elderly mother with a variety of her needs.

I have several friends who are Independent contractors and your actions will make it impossible to give their children the care they need.

The proposed rule threatens my ability to be an independent contractor. An attorney from Troutman Pepper Locke wrote that your proposal “almost entirely eviscerates any chance for most ICs and companies using their services from establishing the workers’ IC status.” Attorneys at Ogletree Deakins wrote that your proposal “could make it very difficult for businesses to demonstrate that workers are independent contractors.” Attorneys at Littler wrote that your proposal would not consider a person to have independent-contractor

status even if we have multiple clients, are licensed in our occupation, own a registered business, and even maintain liability insurance or workers' compensation.

At the June 23, 2025, public hearing about your proposal, witnesses from the Chamber of Commerce testified that it would "create substantial challenges for legitimate independent contractors," and that "virtually no work could be independent." The New Jersey Business and Industry Association's witness testified that the result of your proposal "won't be more jobs, it will be fewer jobs" – and your own proposal states that it will not create any jobs.

Testimony at the public hearing also pointed out that New Jersey's Legislature rejected a similar proposal in 2019-20 after it was met with "staunch opposition." Testimony at the recent public hearing was similar, with witnesses being 3-to-1 against your proposal.

Numerous Democratic Party and Republican Party legislators in Trenton have also written letters to the Department, stating that your proposal is likely to harm independent contractors.

Your proposal threatens my ability to be an independent contractor. I urge you to withdraw this proposed rule immediately and in full.

Greta G. Chinnadurai

gretaggc@gmail.com
973.906.5083
108 Florence Avenue
Denville, NJ 07834
gretadesign.studio

From: Lynn Palladino
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 24, 2025 11:34:33 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Lynn Palladino
18 BRANTON DR
East Brunswick, NJ 08816
lynnpalladino@comcast.net

From: Jen Singer
To: Fish, David [DOL]
Subject: [EXTERNAL] Opposition to NJAC 12:11
Date: Thursday, July 24, 2025 12:13:43 PM

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Report Suspicious

To: David Fish, New Jersey Department of Labor & Workforce Development

Submitted via email to: david.fish@dol.nj.gov on July 24, 2025

Dear Mr. Fish,

I am writing in opposition to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors. I urge the Department to withdraw this proposal in full.

For more than three decades, I have been an independent contractor, providing writing and editing services for authors, speakers, media companies such as The New York Times and Hearst Corporation, hospital systems including NYU Langone Medical Center, and small companies like Heroic Public Speaking.

During this time, I was able to work from home while raising my children, first as a married mom and then as a divorced one. I was also able to use the flexibility of independent contracting to work around major illnesses, including cancer in 2007 and heart failure since 2020. Let's face it: no employer wants to hire a 58-year-old with a pacemaker who sometimes needs mid-afternoon naps. Freelancing allows me to earn a good living on my own terms and schedule while paying for my healthcare, which I get through an association.

The proposed rule threatens my ability to be an independent contractor. An attorney from Troutman Pepper Locke wrote that your proposal "almost entirely eviscerates any chance for most ICs and companies using their services from establishing the workers' IC status." Attorneys at Ogletree Deakins wrote that your proposal "could make it very difficult for businesses to demonstrate that workers are independent contractors." Attorneys at Littler wrote that your proposal would not consider a person to have independent-contractor status even if we have multiple clients, are licensed in our occupation, own a registered business, and even maintain liability insurance or workers'

compensation.

At the June 23, 2025, public hearing about your proposal, witnesses from the Chamber of Commerce testified that it would “create substantial challenges for legitimate independent contractors,” and that “virtually no work could be independent.” The New Jersey Business and Industry Association’s witness testified that the result of your proposal “won’t be more jobs, it will be fewer jobs” – and your own proposal states that it will not create any jobs.

Testimony at the public hearing also pointed out that New Jersey’s Legislature rejected a similar proposal in 2019-20 after it was met with “staunch opposition.” Testimony at the recent public hearing was similar, with witnesses being 3-to-1 against your proposal.

Numerous Democratic Party and Republican Party legislators in Trenton have also written letters to the Department, stating that your proposal is likely to harm independent contractors.

Your proposal threatens my ability to be an independent contractor. I urge you to withdraw this proposed rule immediately and in full.

Jennifer Singer
Red Bank, NJ

JEN SINGER
Ghostwriter | Editor | Book Strategist
Author JUST DIAGNOSED GUIDES
973-534-0838
Jen-Singer.com

From: Bernadette Leiby
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Thursday, July 24, 2025 12:14:34 PM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Bernadette Leiby
97 Washburn Ave
Washington, NJ 07882
ben44ny@yahoo.com

From: Anthony Capri
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 12:40:09 PM

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Dear Executive Director Fish,

I worked as an employee for wire houses for thirty years prior to becoming an independent financial adviser . The reason for this is working as employee you are forced to look out for shareholder best interest NOT clients best interest . Employees are a conflicted by demands of corporations . Independence allows non conflicting pricing and investments . The difference is significant . Independent financial advisers are not employees they must remain as independents

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Anthony Capri
1707 Biden Ln
Williamstown, NJ 08094
anthony.capri@lpl.com

From: Daniel Rosenthal
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 12:40:09 PM

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Dear Executive Director Fish,

The fact I am not an employee of LPL Financial enhances my ability to provide independent advice. Employees must follow the company line. We are free, within the fiduciary guidlines, to do what we think is best for each individual client. LPL provides no services to me that would be attributable to an employer/employee relationship. Note that it is a major selling point, and clients appreciate, that I am independent (not an employee) of LPL.

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

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- Tailor services to client needs.
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- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Daniel Rosenthal
2122 Meeting House Rd
Cinnaminson, NJ 08077
dan.rosenthal@lpl.com

From: Francis Astorino
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 12:40:09 PM

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Dear Executive Director Fish,

We have spent four decades putting clients first before it became law. Limiting our independence and discretion contradicts that value proposition.

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

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- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Francis Astorino
155 Passaic Ave Ste 400

Fairfield, NJ 07004
frank@astorinofinancialgroup.com

From: Alan Concha Iii
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 12:40:09 PM

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Dear Executive Director Fish,

I have left being a W-2 employee in order to better service my clients and act as a true fiduciary. This bill puts clients in harms way, and cannot pass.

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Alan Concha Iii
851 Franklin Lake Rd Ste 105

Franklin Lakes, NJ 07417
alan.conchaiii@lpl.com

From: David Selden
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 12:40:09 PM

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Dear Executive Director Fish,

As an independent advisor, I know it will kill my business. I am monitoring this ruling closely as I would sell my house and move my business out of state. I think you need to reconsider

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

David Selden

929 Lacey Rd
Forked River, NJ 08731
david.selden@lpl.com

From: Walter Eife
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 12:40:10 PM

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Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules would unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. I operate my own practice, rent my own office and maintain direct relationships with my clients, offering highly personalized guidance shaped by their unique needs. LPL Financial serves solely as my compliance partner, ensuring that I meet the extensive regulatory requirements necessary to serve as a licensed advisor. It does not control my business activities, client engagement, or financial decisions.
Our current structure allows me to remain nimble and deeply responsive—qualities that working families count on when navigating complex financial choices like retirement planning, college savings, and long-term care.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Walter Eife
255 New Jersey Ave
Haddon Township, NJ 08108
Walt.Eife@LPL.com

From: John Donnelly
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 12:40:10 PM

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Report Suspicious

Dear Executive Director Fish,

I spent years adding value to my clients by tailoring financial advice to them; being an Independent advisor is a decided advantage versus the "employee model" - by allowing me to be more flexible and creative in offering products and services..

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

John Donnelly

359 Centre St Ste 2
Nutley, NJ 07110
john.donnelly@lpl.com

From: Anne Mulroy
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 12:40:11 PM

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Dear Executive Director Fish,

Governor Murphy & Executive Director Fish,, Please carve out an exemption for independent insurance agents like myself.

Sincerely, Anne Mulroy, CLTC

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Anne Mulroy
415 Main St
Bedminster, NJ 07921
anne.mulroy@lpl.com

From: Jennifer Hoffman
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 12:40:11 PM

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Dear Executive Director Fish,

As a New Jersey resident and executive of a financial services firm, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like those of our financial advisors. As a financial professionals affiliated with LPL Financial, our advisors serve clients across the state and are part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of our relationship with LPL, our advisor have the ability to become an employee of the firm; however, many have made the informed decision to keep their independent contractor status to better serve their clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Jennifer Hoffman
586 Audrey Rd
Landing, NJ 07850
jennifer.hoffman@lpl.com

From: Mandy Sleight
To: Fish, David [DOL]
Subject: [EXTERNAL] Opposition to Proposed New Rules: N.J.A.C. 12:11
Date: Thursday, July 24, 2025 2:12:47 PM

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Dear Mr. Fish,

I am writing in opposition to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors. I urge the Department to withdraw this proposal in full.

I am a content writer who very thoroughly enjoys being a 1099. I have been writing content for the web since 2019 and **hope to continue along this path for the rest of my working life.**

Being an independent contractor has given me the freedom I can never receive as an employee. I can choose which clients I work for, what type of content I write, and when, where, and how I work.

I am not a misclassified employee and I certainly do not need a union to help me receive fair pay and benefits. I am fully capable of doing this on my own.

In fact, I make more being an independent contractor than I ever did as an employee.

The proposed rule threatens my ability to be an independent contractor. An attorney from Troutman Pepper Locke wrote that your proposal "almost entirely eviscerates any chance for most ICs and companies using their services from establishing the workers' IC status." Attorneys at Ogletree Deakins wrote that your proposal "could make it very difficult for businesses to demonstrate that workers are independent contractors." Attorneys at Littler wrote that your proposal would not consider a person to have independent-contractor status even if we have multiple clients, are licensed in our occupation, own a registered business, and even maintain liability insurance or workers' compensation.

At the June 23, 2025, public hearing about your proposal, witnesses from the Chamber of Commerce testified that it would "create substantial challenges for legitimate independent contractors," and that **"virtually no work could be independent."** The New Jersey Business and Industry Association's witness testified that the result of your proposal **"won't be more jobs, it will be fewer jobs"** – and your own proposal states that it will not create any jobs.

Testimony at the public hearing also pointed out that New Jersey's Legislature rejected a similar proposal in 2019-20 after it was met with "staunch opposition." Testimony at the recent public hearing was similar, with witnesses being 3-to-1 against your proposal.

Numerous Democratic Party and Republican Party legislators in Trenton have also written

letters to the Department, stating that **your proposal is likely to harm independent contractors.**

Your proposal threatens my ability to be an independent contractor. I urge you to withdraw this proposed rule immediately and in full.

Thank you,
Mandy Sleight

From: Richard Samara
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Thursday, July 24, 2025 3:30:12 PM

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Report Suspicious

Dear Executive Director Fish,

Thank you for considering feedback on the Department of Labor and Workforce Development's proposed independent contractor regulations.

I am a proud independent financial advisor and a small business owner here in New Jersey. I built my practice from the ground up — investing my own capital, taking on the risks, and serving my clients with personalized financial advice. These proposed regulations could undo all of that by reclassifying me as an employee, a designation that doesn't reflect the reality of my business and could force me to give up the autonomy I've worked hard to achieve.

Like other advisors, I must be associated with a broker-dealer to meet federal and state requirements — but this is a legal compliance measure, not an employment relationship. The broker-dealer actually provides me with services that help me meet my clients' needs — similar to how any business might use software, IT, or legal support. I control how I run my business, who I work with, and how I serve my clients.

Mischaracterizing this relationship as employment not only threatens my livelihood but could lead to fewer financial advisors operating in New Jersey — a blow to the local economy and to residents who rely on our expertise. If advisors are pushed out or driven to other states, clients here will suffer.

I urge you to carefully consider the ripple effects these regulations could have on small businesses like mine and on the people we serve every day.

Sincerely,

Richard Samara
55 Madison Ave Ste 400
Morristown, NJ 07960
richard.samara@madisonwealthplanners.com

From: Nikolas Butkov
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 3:37:42 PM

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Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

There are more than 150,000 independent financial advisors who have long been an integral part of the securities industry across the country. Independent broker-dealers and their affiliated independent financial advisors provide clients in their communities with personalized and comprehensive financial advice. We help our clients invest, save for retirement, pay for their children's education, and buy insurance to cover unexpected expenses.

Ameriprise offers me the option of being an employee or an independent contractor. Being an independent advisor is my choice and allows me the flexibility to determine how I manage my practice, which includes determining the level of staffing support to provide a high-quality client experience, our technology set, and real estate footprint. As an independent advisor, I set my own schedule, select my clients, and assume typical responsibilities of a small business owner including staff, technology and other costs.

Many financial advisors prefer the flexibility to operate within an independent channel to help serve clients well and help them plan for their future. Please help my clients and my small business continue to thrive in New Jersey by specifically excluding financial advisors and broker dealers from compliance with the ABC Test. This will allow me to continue operating as an independent contractor in New Jersey and serve my clients well now and into the future.

Sincerely,

Nikolas Butkov
350 Passaic Avenue
Fairfield, NJ 07004-2025

nikolas.butkov@ampf.com
973-324-9860

From: Jennifer Schmidt
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 3:37:43 PM

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Report Suspicious

Dear David Fish,

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Sincerely,

Jennifer Schmidt
163 Burlington Path Road, Suite H.
Cream Ridge, NJ 08514-1622

jennifer.schmidt@ampf.com
609-223-2000

From: Thomas Gioia
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 3:43:16 PM

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Report Suspicious

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Sincerely,

Thomas Gioia
141 West Front Street
Red Bank, NJ 07701-6418

thomas.x.gioia@ampf.com
732-747-1673

From: Nicholas Fish
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 3:46:17 PM

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Report Suspicious

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Sincerely,

Nicholas Fish
1105 Laurel Oak Rd
Voorhees, NJ 08043-4312

nicholas.s.fish@ampf.com
856-741-8000

From: Jill Williams
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 3:46:17 PM

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Sincerely,

Jill Williams
37 Orange Road, Apt 401, Montclair, NJ
Montclair, NJ 07042-2183

jill.williams@ampf.com
973-860-7222

From: Gayle Hobson
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 3:47:25 PM

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Sincerely,

Gayle Hobson
1105 Laurel Oak Road; Suite 142
Voorhees, NJ 08043-4312

gayle.s.hobson@ampf.com
609-477-0045

From: Patrick Garcia
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 4:03:58 PM

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Sincerely,

Patrick Garcia
50 Upper Montclair Plaza, ste 203
Montclair, NJ 07043-1346

patrick.a.garcia@ampf.com
973-559-5445

From: Evan Dankner
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 4:06:20 PM

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Report Suspicious

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Sincerely,

Evan Dankner
8 Hillside Ave, Suite 301 Montclair NJ
Montclair, NJ 07042-2129

evan.r.dankner@ampf.com
917-472-2723

From: Paul Kalani
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 4:12:22 PM

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Report Suspicious

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Sincerely,

Paul Kalani
3000 Atrium Way, suite 510, Mt. Laurel, NJ
Mount Laurel, NJ 08054-3914

pkalani@ampf.com
856-360-1255

From: Shiv Mittal
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 4:13:20 PM

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Report Suspicious

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Sincerely,

Shiv Mittal
129 summit ave summit nj
Summit, NJ 07901-2838

shivam.mittal@ampf.com
732-772-5234

From: Robert Hall
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 4:21:07 PM

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Report Suspicious

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Sincerely,

Robert Hall
161 S. Main St
Lambertville, NJ 08530-1806

robert.hall@ampf.com
732-866-0262

From: JAMES NOCITO
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 4:43:44 PM

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Report Suspicious

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Sincerely,

JAMES NOCITO
3000 Atrium Way
Mount Laurel, NJ 08054-3909

james.g.nocito@ampf.com
856-669-2600

From: Thomas Boland
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 4:50:07 PM

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Thomas Boland
65 Skylark Ct
Matawan, NJ 07747
thomas.boland@allairewm.com

From: Leonard Thor
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 5:04:43 PM

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Report Suspicious

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Sincerely,

Leonard Thor
173 Essex Avenue
Metuchen, NJ 08840-2281

leonard.thor@ampf.com
908-485-7882

From: DEREK SWANNER
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 5:15:21 PM

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Sincerely,

DEREK SWANNER
141 West Front St
Keyport, NJ 07735-1041

derek.swanner@ampf.com
732-212-8646

From: Leslie Shenkler
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Thursday, July 24, 2025 5:30:11 PM

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Thank you for your attention to this important issue.

Sincerely,

Leslie Shenkler
16 Russett Rd
Kendall Park, NJ 08824
shenkler@verizon.net

From: George Pittaoulis
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 7:08:32 PM

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Sincerely,

George Pittaoulis
1108 Stewart Place
Secane, PA 19018-2820

george.m.pittaoulis@ampf.com
856-669-2600

From: mary Hammett
To: Fish, David [DOL]
Subject: [EXTERNAL] Opinion on employee definition
Date: Thursday, July 24, 2025 8:49:44 PM

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Leave the law alone. It works no need to change something that isn't broken.
Sent from my iPhone

From: Anne Holderried
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 10:09:43 PM

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Many financial advisors prefer the flexibility to operate within an independent channel to help serve clients well and help them plan for their future. Please help my clients and my small business continue to thrive in New Jersey by specifically excluding financial advisors and broker dealers from compliance with the ABC Test. This will allow me to continue operating as an independent contractor in New Jersey and serve my clients well now and into the future.

Sincerely,

Anne Holderried
1896 Wrightstown Rd
Washington Crossing, PA 18977-1322

anne.f.holderried@ampf.com
856-288-8700

From: Carlos Arias
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Thursday, July 24, 2025 11:04:42 PM

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Report Suspicious

Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

There are more than 150,000 independent financial advisors who have long been an integral part of the securities industry across the country. Independent broker-dealers and their affiliated independent financial advisors provide clients in their communities with personalized and comprehensive financial advice. We help our clients invest, save for retirement, pay for their children's education, and buy insurance to cover unexpected expenses.

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Sincerely,

Carlos Arias
990 Raritan Rd
Clark, NJ 07066-1758

carlos.f.arias@ampf.com
908-272-0188

From: Greg Larson
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Friday, July 25, 2025 4:45:28 AM

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Report Suspicious

Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

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Sincerely,

Greg Larson
12 Shade Lane
Whitehouse Station, NJ 08889-3540

gregory.j.larson@ampf.com
908-268-2820

From: Benjamin Rosengard
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 25, 2025 7:10:40 AM

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Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

Our independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Benjamin Rosengard
308 Harper Dr Ste 101
Moorestown, NJ 08057
ben.rosengard@lpl.com

From: Gregory Colucci
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Friday, July 25, 2025 8:24:58 AM

This Message Is From an External Sender
This message came from outside your organization.

Report Suspicious

Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

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Sincerely,

Gregory Colucci
1064 S Main St, Suite 1A. West Creek, NJ
West Creek, NJ 08092-2913

greg.colucci@ampf.com
732-995-3621

From: Sanford osofsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 25, 2025 9:09:33 AM

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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish.

Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey.

The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.

Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Sanford osofsky
16 Mendell Avenue, Cranford, NJ, USA
Cranford, NJ 07016
sando16@verizon.net

From: Leonard Mancini
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Friday, July 25, 2025 10:10:11 AM

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Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident, independent financial professional, and small business owner, I'm writing to express concern about the proposed rules under N.J.A.C. 12:11, which would codify the ABC test for determining independent contractor status.

While I support protecting workers from misclassification, these rules could unintentionally harm legitimate, independently owned businesses like mine. As a financial professional affiliated with LPL Financial, I serve clients across the state and am part of a network of nearly 1,500 advisors managing over $66 billion in assets. As part of my relationship with LPL, I have the ability to become an employee of the firm; however, I have made the informed decision to keep my independent contractor status to better serve my clients.

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- Tailor services to client needs.
- Operate efficiently as small business owners.
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Reclassifying us as employees would disrupt our business model and reduce access to financial guidance for New Jersey residents.

I respectfully urge the Department of Labor & Workforce Development to consider an exemption for financial professionals. This would preserve our independence while maintaining our ability to provide personalized financial guidance to our clients.

Thank you for your attention to this important issue.

Sincerely,

Leonard Mancini
44 Princeton Ave
Brick, NJ 08724
lenny.mancini@lpl.com

From: Hamaun Persaud
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 25, 2025 11:07:35 AM

This Message Is From an External Sender
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Report Suspicious

Dear Mr. Fish,

I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors.

Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.

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Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.

Yours sincerely,
Hamaun Persaud
18 Hyatt Ave Newark NJ
Newark, NJ 07105
kpersaud@shipACE.com

From: D Veronica
To: Fish, David [DOL]
Subject: [EXTERNAL] Independent contractors
Date: Friday, July 25, 2025 12:45:24 PM

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Report Suspicious

This appears to be an attempt to bypass the Legislature, given that similar legislation has repeatedly failed to advance due to widespread opposition from independent contractors, small business owners, and the communities they serve. Please allow the legislature to address this important issue.

Thank you for your consideration

Dana Veronica

From: zakkour chivi
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Friday, July 25, 2025 1:04:46 PM

This Message Is From an External Sender
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Report Suspicious

Dear David Fish,

I write to you today regarding the Department's Independent Contractor Regulation proposal. Applying this test to my profession as an independent financial advisor with Ameriprise Financial in New Jersey may impact my ability to continue operating independently in New Jersey, providing high quality service to people in my community and the state.

There are more than 150,000 independent financial advisors who have long been an integral part of the securities industry across the country. Independent broker-dealers and their affiliated independent financial advisors provide clients in their communities with personalized and comprehensive financial advice. We help our clients invest, save for retirement, pay for their children's education, and buy insurance to cover unexpected expenses.

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Sincerely,

zakkour chivi
10 Jennifer Drive
Holmdel, NJ 07733-1619

zakkour1@yahoo.com
908-601-2945

From: Fair, Andrea [DOL]
To: Fish, David [DOL]
Subject: Mail ABC Test-Patrick Reardon
Date: Friday, July 25, 2025 1:08:45 PM
Attachments: Mail NJAC 12_11 Patrick Reardon.pdf

Andrea Fair, Executive Assistant
New Jersey Department of Labor and Workforce Development
Office of Legal & Regulatory Services
1 John Fitch Plaza, 13th Floor Suite G
PO Box 110
Trenton, NJ 08625-0110
(609) 376-5966
Andrea.Fair@dol.nj.gov

PLEASE NOTE: This electronic message contains information from the New Jersey Department of Labor, and may contain confidential or privileged information. If you are not the intended recipient, do not read, copy or use it or disclose it to others. If you have received this message in error, please notify the sender immediately and then delete it from your system. Thank you.

July 22, 2025

David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
P.O. Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Delivered Via Email: David.fish@dol.nj.gov

Re: Proposed New Rules: N.J.A.C. 12:11
ABC Test; Independent Contractors

Dear Mr. Fish,

I am writing you today to express my deep concerns over the proposed rule (N.J.A.C. 12:11) that could reclassify independent contractors like me as employees.

As an agent in New Jersey, I am subject to significant licensing, continuing education, and regulatory oversight that do not apply to many other industries. We are not the type of workers this rule is intended to protect—and yet, under its current framing, many of us could be forced into employment structures that don't fit the nature of our work. It would be highly disruptive to our industry and would limit the availability of important financial products we provide to families across New Jersey.

Licensed insurance and financial professionals have an established, successful history of appropriate classification as independent contractors and are not involved in the worker classification problems found in other industries. The majority of industry agents work as independent contractors and wish to continue doing so.

Most importantly, failure to exempt independent insurance producers and financial advisors from the DOLWD proposal severely limits the scope of insurance products consumers can access, thereby limiting their ability to protect themselves and their loved ones.

I strongly urge you to reconsider moving forward with the proposed rule, as it's incompatible with the distinct characteristics of our industry and jeopardizes the financial security we offer to our clients. Its implementation would not only adversely affect the livelihood of financial professionals like myself, but it would also limit consumer access in New Jersey.

Thank you for your consideration on this matter.

Patrick Reardon, CFP

7 Sleepy Hollow Rd.

Byram Township, NJ 07821

(973) 786-0100

From: Matthew Graf
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment re: DOL Independent Contractor Proposed Regulation N.J.A.C. 12:11
Date: Friday, July 25, 2025 4:13:18 PM

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Report Suspicious

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Many financial advisors prefer the flexibility to operate within an independent channel to help serve clients well and help them plan for their future. Please help my clients and my small business continue to thrive in New Jersey by specifically excluding financial advisors and broker dealers from compliance with the ABC Test. This will allow me to continue operating as an independent contractor in New Jersey and serve my clients well now and into the future.

Sincerely,

Matthew Graf
8 Hillside Ave, Ste 301
Montclair, NJ 07042-2129

matthew.g.graf@ampf.com
201-927-3491

From: Robert Migliore
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 25, 2025 4:35:33 PM

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Report Suspicious

Dear David Fish,

[highlight=transparent]I am writing to strongly urge the New Jersey Department of Labor and Workforce Development to reject a recently proposed rule that would drastically change how the state classifies independent contractors. [/highlight]

[highlight=transparent]Specifically, Proposed New Rules: N.J.A.C. 12:11 would threaten the livelihoods of hundreds of thousands of people across the state by implementing an "ABC" test for independent workers, freelancers, and contractors.[/highlight]

[highlight=transparent]We don't need to guess at the consequences of passing such a rule. They have already played out in California under the state's AB 5 law, which implements a similar ABC test. Almost overnight, hundreds of thousands of workers across industries, including music, journalism, and trucking, saw their livelihoods vanish. [/highlight]

[highlight=transparent]Since AB 5's passage, hundreds of carve outs have been made to the law to protect certain industries from harm – further proof that the law does not work. Now, research shows that AB 5 caused job losses across the board in California, not just for independent workers. We can't let that happen in New Jersey. [/highlight]

[highlight=transparent]The reality is the vast majority of independent workers are happy with their employment status. 1 in 5 jobs in America are held by an independent worker including in industries like healthcare, financial services, logistics, and retail and about 75 percent of these workers chose their work arrangement.[/highlight]

[highlight=transparent]Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.[/highlight]

Yours sincerely,
Robert Migliore
3000. hilltop. road
Whiting, NJ 08759
migliorerobert818@gmail.com

From: Joe Ostrowski
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 25, 2025 4:40:35 PM

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Report Suspicious

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[highlight=transparent]Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.[/highlight]

Yours sincerely,
Joe Ostrowski
37. rickland dr
Sewell, NJ 08080
jjwalltex@gmail.com

From: Toni Young
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 25, 2025 4:40:37 PM

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Report Suspicious

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Yours sincerely,
Toni Young
9 westgate apartment
Washington, NJ 07882
toniyoung634@gmail.com

From: Andrea Thompkins
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 25, 2025 4:47:33 PM

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Report Suspicious

Dear David Fish,

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[highlight=transparent]Independent workers across the country have spoken up against efforts to reclassify them against their will. I implore you to listen to these workers, and reconsider this harmful rule.[/highlight]

Yours sincerely,
Andrea Thompkins
867 greenwood road
Teaneck, NJ 07666
smilinghappiness21@gmail.com

From: Cornelius Dilauro
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 25, 2025 4:48:32 PM

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Report Suspicious

Dear David Fish,

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Yours sincerely,
Cornelius Dilauro
105 back brook road
Ringoes, NJ 08551
dilaurocornelius2@gmail.com

From: Barry Felix
To: Fish, David [DOL]
Subject: [EXTERNAL] Public comment on PRN 2025-051: Please reject the proposed rule
Date: Friday, July 25, 2025 4:52:53 PM

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Report Suspicious

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Yours sincerely,
Barry Felix
301 irvine turner boulevard
Newark, NJ 07108
barfelix1961@gmail.com