From: James Rice
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Tuesday, August 5, 2025 11:30:08 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.

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 Rice
2100 Cleveland Ave
Wall Township, NJ 07719
jrice@ia-wealth.com

From: Jacki Frank
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:31:46 AM
Importance: High

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Report Suspicious

Dear Mr. Fish,

As the owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule.

Independent insurance producers—myself and my team included—have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing. This model benefits consumers, encourages competition, and allows small businesses like mine to serve our communities effectively.

The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers.

I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and their clients across New Jersey. Thank you for considering my comment.

Jacki Frank, AAI

Tri County Agency of Brick, Inc.
1875 Route 88
Brick, NJ 08724
732-836-1050 x113
Fax 732-836-3409
Cell 908-910-4577
www.tri-countyinsurance.com

We do pet Insurance too! Click for rates & info
https://agency.petinsurance.com/tricountyinsurance
Enrollment line for customers: 844-397-8939; mention discount Code N14494 for a 5% client discount

From: jen groendyke.net
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:32:23 AM

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Report Suspicious

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Jennifer Williamson

Account Representative

Sanford N. Groendyke Inc. t/a Groendyke Associates

Califon, NJ

From: Jay Jeney
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:33:12 AM

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Report Suspicious

Dear Mr. Fish,

As the owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule.

Independent insurance producers—myself and my team included—have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing. This model benefits consumers, encourages competition, and allows small businesses like mine to serve our communities effectively.

The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers.

I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and their clients across New Jersey.

Thank you for considering my comment.

Jay Jeney
Vice President
The Schenck Agency, Inc.
Metuchen, NJ

From: Kristin Ryan
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:33:38 AM
Attachments: image001.png
image002.png
image003.png

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Report Suspicious

Dear Mr. Fish,

As the owner of an independent insurance agency here in New Jersey, I wanted to share my concerns regarding the Department's proposed worker classification rule.

Independent insurance producers—myself and my team included—have always operated as independent contractors. We're licensed professionals who represent multiple carriers, which allows us to offer our clients a range of coverage options and competitive pricing. This model works. It benefits consumers, fosters healthy competition, and helps small businesses like mine thrive.

What's missing in the proposed regulation is clear language confirming that licensed insurance producers are exempt from the ABC Test. While the Department did clarify during the June 23 hearing that producers remain exempt under current law, that needs to be written into the final rule. Without that clarity, insurers may pull back from working with independent agencies out of concern for legal exposure—hurting small agencies and limiting options for the people we serve.

I strongly urge the Department to revise the proposed rule to clearly state that licensed producers are exempt. It's a simple but critical change that aligns with current law and protects a business model that supports thousands of producers and clients across the state.

Thank you for your time and consideration.

Kristin Ryan
COO - Hanson & Ryan Inc.
973-774-5981
862-881-0515
kryan@hanson-ryan.com
www.hansonryan.com
87 Lackawanna Ave, Totowa, NJ
Schedule Meeting

From: Jamie Nielsen
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:35:26 AM

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Dear Mr. Fish,

I'm writing as a licensed insurance producer in New Jersey who has proudly built a career—and a client base—under the independent agency model.

For decades, producers like myself have been recognized as independent contractors, not employees. We enter into agreements with multiple carriers, allowing us to offer clients real choice, flexibility, and competitive options. This structure doesn't just support small business owners like me—it serves the public interest.

However, the proposed rule does not clearly exempt licensed insurance producers from the ABC Test. That omission introduces unnecessary uncertainty. Without a clear exemption written into the rule, insurers may be forced to reconsider how they engage with producers, threatening our ability to serve clients and grow our businesses.

At the June 23 hearing, the Department acknowledged that producers continue to be treated as independent contractors. I appreciate that—but unless this exemption is formally included in the regulation, our profession remains vulnerable to misinterpretation and disruption.

I urge the Department to revise the proposed regulation to explicitly exempt licensed insurance producers from the ABC Test. This small clarification would reflect current law, maintain stability, and safeguard a model that works for New Jersey businesses and consumers alike.

Thank you for considering this request.

Sincerely,
Jamie

Jamie G Nielsen Jr.
Hanson & Ryan Insurance
*Family Owned and Operated since **1876***
87 Lackawanna Ave
Totowa NJ 07512
Office: 973-256-6000
Mobile: 973-445-3147

From: John Latimer Jr
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:35:49 AM

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Report Suspicious

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

John A. Latimer Jr., Esq.
General Counsel
The Barclay Group & JS Braddock Agency

P: 856-829-1594 x1240
C: 856-685-3623
E: jlatimerjr@barclayinsurance.com

W: barclayinsurance.com

From: Phyllis S. Walsh, CPCU, ARM
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:35:57 AM
Attachments: image001.png
image002.png

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Report Suspicious

Dear Mr. Fish:

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like me.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Phyllis S. Walsh, CPCU, ARM | Exec. Vice President
License#: 0M63276

O: 973.863.2819 | **E:** pwalsh@whartoninsurance.com

101 South Livingston Ave, PO BOX 1660, Livingston, NJ 07039

From: LISTA, GEORGE
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:38:05 AM
Attachments: image002.png
image003.png
image004.png

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Report Suspicious

Dear Mr. Fish,

As the owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule. Independent insurance producers—myself and my team included—have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing. This model benefits consumers, encourages competition, and allows small businesses like mine to serve our communities effectively. The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers. I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and their clients across New Jersey.

Thank you for considering my comment.

George Lista | President & CEO
96 US Hwy 206 | Augusta, NJ 07822
o. 973.579.6776 | c. 201-247-0652
providentprotectionplus.com

Provident PROTECTION PLUS

From: Michael McMahon
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:39:46 AM

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Report Suspicious

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Sincerely,

Michael McMahon, CIC, CISR
Claims Manager
McMahon Agency, Inc.
Ocean City, NJ

From: Debbie Ingham
To: Fish, David [DOL]
Subject: [EXTERNAL] SUBJECT LINE: Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:41:36 AM

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Report Suspicious

Dear Mr. Fish,

As the owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule.

Independent insurance producers—myself and my team included—have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing. This model benefits consumers, encourages competition, and allows small businesses like mine to serve our communities effectively.

The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers.

I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and their clients across New Jersey.

Thank you for considering my comment.

--
Deborah Ingham
Joseph F. McHugh Agency, Inc
609-499-0533

From: Stanford, L. Scott
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:48:48 AM
Attachments: image001.png

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Report Suspicious

Dear Mr. Fish,

I am submitting commentary as a licensed insurance producer here in the State of New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers such as myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Respectfully,

Leland S. Stanford

Leland Scott Stanford, AAI

STANFORD AGENCY
INSURANCE
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w 732.924.6999 | d: 908.899.0000
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From: katiemostowik@northwesternmutual.com
To: Fish, David [DOL]
Subject: [EXTERNAL] Northwestern Mutual Company Letter {Secure Message}
Date: Tuesday, August 5, 2025 11:49:19 AM
Attachments: image001.png
Northwestern Mutual Company Letter 2025.pdf

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Report Suspicious

Greetings,

On behalf of Ryan Heinemann, please see attached the Northwestern Mutual Company Letter submission. If you have any questions, please contact Ryan Heinemann at ryanheinemann@northwesternmutual.com/414-665-5335 or Rodd Schneider at roddschneider@northwesternmutual.com/414-665-3660.

Thank you,

Katie

Katie Mostowik
Executive Assistant to Ryan W. Heinemann, Vice President & General Counsel

Northwestern Mutual
720 E. Wisconsin Avenue, Milwaukee, WI 53202
Email: katiemostowik@northwesternmutual.com
Phone: 414.665.6700

Northwestern Mutual

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Northwestern Mutual®

Ryan W. Heinemann
Vice President & General Counsel
720 East Wisconsin Avenue
Milwaukee, WI 53202-4797
414 665 5335 office
ryanheinemann@northwesternmutual.com

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:

We submit this letter on behalf of The Northwestern Mutual Life Insurance Company in response to the Department of Labor and Workforce Development's ("Department") proposed new N.J.A.C. 12:11 (the "Proposed Rules" or "Proposal"), which would make changes to the ABC test used to determine whether an individual is an independent contractor for purposes of various New Jersey statutes. We respectfully submit that the Proposal is unnecessary with respect to licensed insurance agents and registered financial representatives to achieve the Department's presumed objectives; is not wanted by the very individuals the Department believes it is helping through the Proposal; and will cause problems and unintended consequences that will outweigh any hoped-for benefits.

The push by various State regulators in the past few years to bring more workers within the definition of "employee" vs "independent contractor" seems motivated by a desire to provide individuals more workplace benefits and protections. States may also believe that increasing the number of employees will result in more tax revenue. While there may be reasons to enhance such protections for some workers, those reasons do not exist for independent insurance producers and other financial professionals. These individuals already receive significant workplace benefits. Nor is the State losing out on tax revenue due to their independent status.

Financial Professionals' Health Care and Retirement Benefits

Pursuant to a special provision of the Internal Revenue Code, Northwestern Mutual's independent contractor insurance producers, as well as thousands more individuals representing other insurance companies, are classified as "statutory employees". As statutory employees, Northwestern Mutual and other insurers are able to and in fact do provide health care and retirement benefits to their producers. In addition to providing these benefits, the companies also withhold and pay certain taxes on behalf of these statutory employee representatives, and the representatives are individually responsible for paying additional taxes.

Importantly, to qualify as a statutory employee and receive benefits based on that status, an individual must be an independent contractor. If the Department or a court ultimately were to conclude that under the Proposed Rules Northwestern Mutual's financial representatives are common law employees

rather than independent contractors, these individuals would no longer qualify to receive the benefits they currently are receiving as statutory employees.

Financial Professionals' Flexible Scheduling

Not only do these independent financial professionals receive workplace benefits akin to many workers who are considered employees, they also enjoy more freedom and flexibility than do such workers. These independent financial professionals want to be independent. They are entrepreneurial. They want to build their own businesses. They want to have more control over their daily schedules; when and how often they can take vacations; who they seek out as clients; which other individuals they want to form a business partnership with. These individuals knowingly and deliberately contract with Northwestern Mutual and its peer companies as independent contractors precisely because they want the freedom and flexibility that comes with the position. If the Proposal results in some or all of these financial professionals being deemed employees, then rather than benefiting them, the Proposal will instead deprive these individuals of the benefits of independence they deliberately sought and very much desire.

Preserving Consumer Choice

In addition to hurting the workers the Proposal is aimed at helping, it would harm New Jersey consumers, and cause unintended problems, if the Proposed Rules lead the Department to categorize currently independent financial professionals as employees. While many of these individuals primarily sell the products of one company, many, if not most, have contracts with multiple companies. This arrangement enables these individuals to offer their clients choices. This benefits New Jersey consumers. Consumers are not restricted to purchasing a life insurance policy or investment product only from the one company by whom the individual financial professional is employed. The consumers can instead compare prices and terms offered by different companies.

However, if the Department interprets the Proposed Rules in a way that deems these independent financial professionals to be employees, it would lead to other questions and negative consequences. For example, which of the multiple companies an individual has contracts with would be deemed the individual's employer? How would that determination be made? And once the Department makes that determination, the individual likely would only be able to offer to his or her clients the products of that one company due to an employee's duty of loyalty to his or her employer. New Jesey consumers thus would be deprived of choice.

Conflict of Laws

The Proposal also could result in an untenable conflict between New Jersey's Unemployment Compensation Law ("UCL") N.J.S.A 43:21-1 et seq. and its Wage Payment Law ("WPL"). The UCL contains a specific exemption for insurance producers compensated on a commission basis. If the Proposed Rules result in an insurance producer being deemed an employee for purposes of the WPL, how can that conflict be reconciled? How can an individual be treated as an independent contractor or otherwise exempt under one law and as an employee under a different law?

ABC Test Concerns

The Proposal is concerning because of how it reinterprets the ABC test. No state has promulgated such a restrictive test. Moreover, the Proposed Rules fail to take into account requirements unique to the financial services industry.

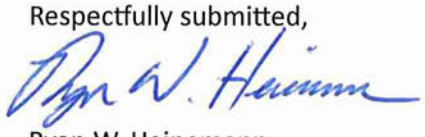
For instance, Prong A under the Proposal appears to provide that the supervisory oversight financial firms exercise over their financial professionals would be considered an example of the exercise of control that is indicative of employee status. But such oversight is mandated by the Financial Industry Regulatory Authority ("FINRA") and the U.S. Securities and Exchange Commission ("SEC"), as well as the New Jersey Department of Banking and Insurance ("NJDBI") for the protection of consumers. It would be ironic if this beneficial supervisory oversight resulted in currently independent financial professionals being transformed into employees, thus depriving both them and the consumers they serve of the benefits of that independence.

Prongs B and C of the Proposal similarly do not recognize the regulatory structure under which insurance companies and other financial institutions must operate. FINRA, the SEC, and the NJDBI require insurance producers and investment professionals to affiliate their independent insurance and investment practices with licensed insurers and broker-dealers. By law, insurance producers and investment professionals cannot operate entirely on their own, unattached to a regulated insurer or broker-dealer. Industry regulations also restrict how much these professionals can be paid, and how they are paid. Yet Prongs B and C of the Proposal arguably suggest that these regulatory requirements would lead these professionals to be characterized as employees.

Conclusion

For the reasons stated herein, we respectfully urge the Department to make clear that insurance agents and other financial professionals are not to be considered employees. This can be accomplished by the Department's expressly providing that the UCL's existing exclusion for commission-based life insurance agents from the definition of employee be carried over to the WPL and other laws mentioned in the Proposal. Alternatively, the Department can follow California's lead and expressly exempt from the Proposed Rules individuals and entities subject to oversite and regulation by the NJDBI, FINRA, and/or the SEC. We would be pleased to meet and discuss these perspectives at any time if that would be of interest.

Respectfully submitted,



Ryan W. Heinemann
Vice President & General Counsel

C: Justin Zimmerman, Commissioner New Jersey Department of Banking and Insurance

From: Chris Camburn
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Tuesday, August 5, 2025 11:50:07 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.

The ABC test provides for an interesting debate about the employer employee relationship. But I caution you as to not write it in such unintended terms as to include professions that are independent and want to remain independent as employees. As an independent financial advisor I fail Prong A and Prong C as written but might be considered an employee under prong B. So I can appreciate someone's interest to be classified and employee but I caution you in writing this that you don't unintentionally lump in professions that do not want to be employees as employees. Or, where there's a gray area, provide some sort of opt out mechanism.

Sincerely,

Chris Camburn
11 Briarwood Ave
Atlantic Highlands, NJ 07716
chris.camburn@lpl.com

From: Michael Tormey
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Tuesday, August 5, 2025 11:50:08 AM

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Report Suspicious

Dear Executive Director Fish,

As a New Jersey resident and financial professional. 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.

The independent status allows us to:

- Tailor services to client needs.
- Operate efficiently as small business owners.
- Maintain flexibility and high-quality service.

Reclassifying independent advisors 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 Tormey
51 Bay Harbor Blvd
Brick, NJ 08723
MIKE.TORMEY@LPL.COM

From: Roger Moss
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Tuesday, August 5, 2025 11:50:08 AM

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Dear Executive Director Fish,

I spent over 25 years of my life in an employee model, both as a Financial Advisor and A Branch Manager (Banc of America Investment Services and Ameriprise). I am fully aware of what an employee model looked like. I decided back in 2016 to open my own OSJ. This was an opportunity to take what I learned and build equity for myself which will help in retirement. Although there are advantages to being an employee - health insurance, 401(k) match, restricted stock, etc. I was happy to forgo all of that to work as an independent Financial Advisor. I am solely responsible for all of my expenses (rent, electric, technology, postage, etc) and simply need an independent broker dealer to custody my assets. I urge you not to undo what I have accomplished as an Independent Financial Advisor, as the differences between the 2 models are vast. Thank you for your consideration.

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,

Roger Moss
350 Main Rd Ste 204
Montville, NJ 07045
roger.moss@lpl.com

From:	Jason Sigman
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Request that N.J.A.C.12:11 includes an exemption for insurance producers
Date:	Tuesday, August 5, 2025 11:52:29 AM
Attachments:	StaffDOLCTA.pdf
Importance:	High

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Dear Mr. Fish,

Would you please find the attached formal request that N.J.A.C.12:11 includes an exemption for insurance producers and help make this happen?

Without your help with this exemption the proposed Worker Classification Rule (N.J.A.C. 12:11) will be drastically change the work we've been doing for over 100 years.

Thanks,
Jason Sigman

Julius A. Rose, Inc. Insurance Agency
194 Broadway |PO Box 456|Bayonne, NJ 07002
Phone 201-436-7600 ext.12 | Fax 201-436-9141
JSigman@jaragency.com www.JARagency.com

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Reliable, Quality and Trusted Insurance Services since 1902

Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Jason Sigman

Jason Sigman
Insurance Agent
Julius A. Rose, Inc.
Bayonne, NJ

From: Gail Lanza
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 11:54:07 AM

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Allen & Stults Co. INSURANCE

This is an encrypted email from **Gail Lanza**. To reply to this email encrypted, you may **Click here**.

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

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Thank you for the opportunity to comment.

Gail Lanza
Account Manager
Allen & Stults Co., Inc.
Hightstown, NJ 08520

Gail Lanza

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Allen & Stults. Co., Inc.
106 N. Main St.
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From:	Patrice Onwuka
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Independent Women Comment: Opposing Proposed Rules on Independent Contractors
Date:	Tuesday, August 5, 2025 11:58:57 AM
Attachments:	IWF-CEO_Comments_Proposed Rule 2025.pdf

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Dear Director Fish,

Please find attached and copied below a public comment from Independent Women/Center for Economic Opportunity registering opposition to the proposed rule: N.J.A.C. 12:11; ABC Test; Independent Contractors.

Please let me know if you have any issues accessing the letter.

Sincerely,
Patrice Onwuka
--

Independent Women's Forum

Patrice Onwuka (On-wu-ka)

Director, Center for Economic Opportunity

Independent Women's Forum

857-205-4701

patrice.onwuka@iwf.org

@PatricePinkFile

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August 4, 2025

David Fish
Executive Director
Legal and Regulatory Services
NJ Department of Labor and Workforce Development
PO Box 110
Trenton, NJ 08625

Re: Comment of Independent Women and the Center for Economic Opportunity Seeking Withdrawal of Proposed New Rules: N.J.A.C. 12:11; ABC Test; Independent Contractors

Dear Director Fish,

The Center for Economic Opportunity (CEO) is a center of Independent Women, a non-profit, non-partisan 501(c)(3) organization founded by women to foster education and debate on legal, social, and economic policy issues. The CEO's goal is to advocate for common-sense policy solutions, grounded in data, to expand workplace choice, freedom, and opportunity and thereby improve the lives of women and workers.

Independent Women submits these comments to express opposition to the Department of Labor and Workforce's proposed new rules entitled, "Proposed New Rules: N.J.A.C. 12:11; ABC Test; Independent Contractors," published in the New Jersey Register of May 5, 2025.

Independent Women believes the Department's proposed rules would alter the language of the ABC test in a way that would lead to mass reclassification of independent contractors across the state. Workers, especially women, who depend on this model of work will lose flexibility and be forced out of the workforce. Small businesses that rely on independent contractors would face new legal exposure and potential penalties from misclassification findings. Those who cannot afford to hire their independent workforce as employees may be forced to shut down. We believe this will have a detrimental impact on the self-employed workforce and the state's economy overall.

New Jersey's Proposed Rules

The Department proposes changes to its employment test that will lead to mass reclassification of many of the state's independent workers.

Currently, under state law, the three-prong ABC test establishes that a worker is classified as an independent contractor when an individual:

> (A) is free from the control or direction of a business in performing the service;
>
> (B) performing the service is outside the "usual course of business" or outside of "all the places of business" of the company; and
>
> (C) is engaged in an independent "trade, occupation, profession or business."

The proposal would rework the prongs in ways that will make it more challenging to meet the standards and effectively lead to many workers being reclassified. Vague new factors, subcategories, and examples introduce greater confusion and complexity in determining worker classification. Open-ended statements included in the proposed changes that do not clearly define which factors are appropriate for a given situation or how factors are weighed create significant new uncertainty for businesses and independent workers.

Through these proposed rules, the Department seeks to regulate what the New Jersey legislature failed to codify. In 2019, the New Jersey legislature sought to impose new

restrictions on independent contractors through legislation that failed to pass following public outcry. This alone is concerning since the legislature, which is accountable to the people, should make sweeping changes to employment policy, not unaccountable and unelected regulators.

Women Stand to Lose

Freelancing has a long history in America. Technology's development of app-based freelance and gig opportunities has expanded the ranks of freelancers, creating a thriving community of self-employed professionals and skilled workers.

Over **70 million** Americans freelanced in 2023, and about half of them were women. While many people find rewarding full-time careers working for themselves, the vast majority of independent contractors are earning supplemental income; this is not their primary job. According to a 2021 Pew Research Center **analysis**, 68% of gig workers use platforms for a side job compared to 31% who use them for primary work.

In working for themselves, freelancers control when, where, how, and for whom they work. According to the Bureau of Labor Statistics, flexibility is a top reason that over **80%** of independent contractors indicated that they prefer this work arrangement over traditional employment.

Flexibility is the primary motivator for women. In 2023, **nine out of ten** female workers who left full-time employment to engage in independent contract work said they did so to prioritize flexibility over stability.

Independent contracting offers women the ability to manage other priorities, such as caregiving for children, aging parents, or sick spouses, and managing their personal health conditions. Some flexible workers are pursuing their own education. Still, others use freelancing as an entry point into entrepreneurship.

Independent contractors report high levels of financial strength and security. Last year, **52%** of independent workers indicated they earn more money working on their own, with 4.7 million of them earning over $100,000 annually. Two out of three (65%) full-time independent workers felt more secure working independently.

Independent contractors also indicate that the freedom and flexibility they enjoy improve their quality of life: A significant **84%** are happier, and 79% said working on their own was better for their health. In 2022, researchers at UCLA Health **found** that "self-employed women had a 43% lower risk of reporting high blood pressure, a 34% lower risk of reporting obesity, and a 30% lower risk of reporting diabetes compared to women who work for a salary or wages."

Losing their independent status leaves women in worse financial, family, health, and personal situations. For many women, independent contracting is not just a preference, but the only way they can continue to work because of their unique circumstances.

At Independent Women, we speak to **women** who can raise children or undergo medical treatments because of their ability to work flexibly rather than in a traditional 9-to-5 job. One New Jersey independent contractor **explained in an interview**, "When I started with New York Life, I was recovering from a painful divorce, raising two young sons—just 2 and 4

years old. This profession gave me what I needed most: a flexible, rewarding and meaningful career as a business owner to provide for my family." On this proposed rule, she noted, "Please don't destroy my career—a career that helped me stand on my own two feet and raise my children."

In surveys, women and adults overall oppose efforts by the government to restrict independent contracting. In **polling** released this year, 82% of women and overall voters, 80% of young voters, and 79% of seniors agree that the government should allow people the flexibility to be independent contractors.

Mass reclassification would undermine women's attachment to the labor force. Their households would be negatively impacted by the expected loss of primary or supplemental income. We would ask the Department:

- *To estimate how many independent contractors, such as freelancers, self-employed professionals, and gig workers, would be forced out of the workforce if they were reclassified as traditional employees.*
- *To explain how many women would be affected by reclassification.*
- *To estimate the economic impact of mass reclassification on the economy, workforce, and state budget.*

California's ABC Test

New Jersey's proposed rule harkens to similar legislation passed in 2019 in California. Assembly Bill 5 (AB 5), enacted in 2020, implemented a rigid ABC test that led to devastating consequences across California's economy. It was assumed that businesses would hire their contracted workforce as employees and absorb the estimated 30% labor-cost increase.

However, an employment increase never materialized. Instead, AB 5 spawned the loss of income, contracts, and livelihoods for freelancers. The group Freelancers Against AB5 compiled a **list of personal stories from 600 professions** impacted by AB 5. Self-employment fell by 10.5%, and overall employment fell by 4.4%, according to **research** by Liya Palagashvili and others at the Mercatus Center. Critically, as this research found, AB 5 did not lead to the hoped-for growth in traditional employment.

Entire professions that were not able to secure exemptions were wiped out. Women like Jessica Tucker, a freelancing transcriber from Linda, CA, lost coveted flexible opportunities. Tucker once earned $60 an hour for her transcription services while working at home, pursuing a master's degree, and raising two children. "AB5 took this away completely, and my family has been struggling to put food on the table ever since," she **noted**. "This law directly targeted marginalized women like myself." Consumers also pay a higher price for the services when the supply of workers in an industry diminishes. Those seeking

transcription and translation services are also casualties of this law.

Independent contractors left the state and relocated to states that do not restrict independent contractors. The small businesses that depend on independent contractors to survive were also placed in turmoil. For example, Monica Wyman managed a thriving floral and wedding event planning business while raising children and battling cancer in California until AB 5. She employed other stay-at-home mothers as independent contractors due to the sporadic and seasonal nature of her business. Under the rigid ABC test, her business model couldn't pass the rigid ABC test, she **explained**. "I'm at this crossroads where I'm thinking I'm going to have to dissolve my business and close my doors."

We would ask the Department whether it considered the impact of California's ABC test on its workforce and small businesses before embracing these devastating new restrictions.

Summary

New Jersey's Department of Labor has indicated that it seeks to alter its ABC test, establishing worker classification, in ways that increase complexity and uncertainty rather than providing certainty and clarity. This will lead to mass reclassification of the state's independent workforce with a disproportionate impact on women.

Seeking to combat worker misclassification is understandable, but the DOL should first understand the level of misclassification in the workforce and investigate industries where it commonly occurs to better target enforcement efforts rather than taking a broad, sweeping approach that penalizes all employers of independent contractors and could lead to all independent contractors losing their status.

Freelancers, self-employed professionals, and gig workers desire flexibility to work around important priorities. Many women cannot stay in the workforce if they lose their independent contractor status. As California demonstrates, mass reclassification efforts will lead to devastating outcomes for women, the workforce, and the small business community that depends on independent contractors to operate.

Independent Women and the CEO request that the Department withdraw the proposed rule.

Sincerely,

Patrice Onwuka
Director, Center for Economic Opportunity
Independent Women

IndependentWomen®

August 4, 2025

David Fish
Executive Director
Legal and Regulatory Services
NJ Department of Labor and Workforce Development
PO Box 110
Trenton, NJ 08625

Re: Comment of Independent Women and the Center for Economic Opportunity Seeking Withdrawal of Proposed New Rules: N.J.A.C. 12:11; ABC Test; Independent Contractors

Dear Director Fish,

The Center for Economic Opportunity (CEO) is a center of Independent Women, a non-profit, non-partisan 501(c)(3) organization founded by women to foster education and debate on legal, social, and economic policy issues. The CEO's goal is to advocate for common-sense policy solutions, grounded in data, to expand workplace choice, freedom, and opportunity and thereby improve the lives of women and workers.

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Summary

New Jersey's Department of Labor has indicated that it seeks to alter its ABC test, establishing worker classification, in ways that increase complexity and uncertainty rather than providing certainty and clarity. This will lead to mass reclassification of the state's independent workforce with a disproportionate impact on women.

Seeking to combat worker misclassification is understandable, but the DOL should first understand the level of misclassification in the workforce and investigate industries where it commonly occurs to better target enforcement efforts rather than taking a broad, sweeping approach that penalizes all employers of independent contractors and could lead to all independent contractors losing their status.

Freelancers, self-employed professionals, and gig workers desire flexibility to work around important priorities. Many women cannot stay in the workforce if they lose their independent contractor status. As California demonstrates, mass reclassification efforts will lead to devastating outcomes for women, the workforce, and the small business community that depends on independent contractors to operate.

Independent Women and the CEO request that the Department withdraw the proposed rule.

Sincerely,

Patrice Onwuka
Director, Center for Economic Opportunity
Independent Women

From: Daniel Martin
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed New Rule N.J.A.C. - 12:11 - Opposed
Date: Tuesday, August 5, 2025 12:01:07 PM

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Executive Director Fish,

Thank you for the opportunity to comment on the proposed rule N.J.A.C. 12:11 about the ABC test for independent contractors. I am opposed to the rule change because it would misclassify me as an employee when I am in fact an independent business owner.

Here is why I would be misclassified. The rule does not accurately assess or consider the business structure of independent financial advisors like myself. Specifically, my relationship with a Broker-Dealer. This association between myself and my broker dealer is a regulatory requirement to conduct securities business with residents of New Jersey.

In my case the Broker-Dealer is a service provider – not an employer. They are compensated for their services, they satisfy a regulatory requirement. The work and cost of running, growing, marketing the business are done by me. The Broker-Dealer does not provide me with office space, required services, equipment, office supplies, or any other physical infrastructure. All time and financial commitments are fully carried by me, the business owner.

This association is not employment - it is a legal requirement to do business. A good analogy is how an attorney must be associated with the New Jersey State Bar to work as a lawyer in New Jersey. We can agree that the State Bar doesn't employ them – but that association is required for that attorney to work. My association with a broker dealer is similar. I must be associated with a broker dealer so I can do my job within the confines of Federal and State law. I must be associated with a Broker-Dealer so I am in compliance – but that association isn't employment in any way.

The arrangement between independent financial advisors and broker-dealers can't be changed in a practical to satisfy ABC test so it would correctly classify me as independent. Preserving the independence of this business structure is critical to the residents of New Jersey for giving them the greatest variety of services without limiting them to brokerage firms and banks.

I believe that the spirit of the law – to protect certain classes of workers - is right. But the ABC test is too general and rigid to apply to every independent business in NJ

outside of these certain classes. The ABC test will misclassify some independent workers and business owners as employees. The ABC test of rule 12:11 test does not consider the structure of my business and does not accurately assess my independence. The proposed ABC test would incorrectly classify me as an employee of my Broker-Dealer because of how the business must be structured. It does not consider the true nature or necessity of the relationship.

Please reconsider this rule change in light of these facts.

Thank you,

Daniel R. Martin

Daniel R. Martin

CERTIFIED FINANCIAL PLANNER™

Accredited Investment Fiduciary®

D.R. MARTIN AND ASSOCIATES

Office: 201 479-0759 | Mobile: 201 563-7465, Calls Only/No Texts| Fax: 201 479-0828

4 Franklin Avenue, Suite 1
Ridgewood, NJ 07450

www.drmartinassociates.com

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From:	Lanza, Denise
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Comments regarding Proposed New Rules: N.J.A.C. 12:11 ABC Test; Independent Contractors
Date:	Tuesday, August 5, 2025 12:06:13 PM
Attachments:	Ind. Contractor Reg. Comments.docx

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Hello – attached please find comments regarding the proposed rules referring to Independent Contractors. This would have a major, negative effect on local park and recreation department programs. I appreciate your acceptance of the attached letter. Thank you.

Denise Lanza, MAS, CPRP
Assistant Deputy Director
Administration
Morris County Park Commission
P.O. Box 1295, Morristown, NJ 07962-1295
300 Mendham Road, Morristown, New Jersey, 07960
O: 973.326.7615 || C:
dlanza@morrisparks.net
www.morrisparks.net

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August 5, 2025

NJ Department of Labor
Labor and Workforce Development

Comment to Proposed Regulations Regarding Independent Contractors

Dear Sir,

As the co-chair of the New Jersey Recreation and Park Association Public Affairs Committee, and a professional in the field of parks and recreation, I write to express my deep concerns with the proposed rules for independent contractors.

Throughout the community services of parks and recreation, many people are contracted workers. This might include youth sports coaches, referees and umpires, it might include a yoga or Pilates instructor. They may work for a sports season, or they may work once per month.

The challenge to meet all three conditions, with the new Department regulatory interpretations, will negatively affect the services provided to our communities. In particular these may impact low income, urban residents most.

Let me share some examples:

A youth league umpire – works the games scheduled by the park and recreation department at the rate of pay agreed upon. Games occur during the season. The umpire has special training, controls the game, is not supervised by the department while preforming his duties. If considered an employee, costs would rise for the local department and would have to be passed on to participants.

A youth league coach – works similar to above umpire but also includes practices that he or she coordinates. In this case, there usually is additional training provided – in this current environment it is critical to ensure the safety of our children, and coaches must be aware and responsible for establishing safe conditions. The local department must also ensure that they are providing a safe program with trained coaches.

A yoga instructor holding classes for seniors – perhaps classes are held at the local community center according to a schedule agreed upon between the professional instructor and the department, at a rate of pay also agreed upon. The instructor has training, may be certified, runs the program for the designated period of time. Classes may be scheduled once per week for a period of weeks, or maybe once per month. Considering this person an employee raises costs, may require cancellation of the class, or higher costs to participants.

I truly hope that you will see that there are clearly cases where independent contractors are partners in providing valuable services to our communities.

Sincerely,

Denise Lanza, CPRP, MAS
NJRPA Public Affairs Committee, Co-chair

From: Martin Agacinski
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C.12:11
Date: Tuesday, August 5, 2025 12:11:22 PM

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Dear Mr. Fish,

As the owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule. Independent insurance producers—myself and my team included—have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing. This model benefits consumers, encourages competition, and allows small businesses like mine to serve our communities effectively. The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers. I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and their clients across New Jersey. Thank you for considering my comment.

Martin J Agacinski III, CIC, CRM
BIS Improved Insurance Agency
AG Insurance Agency
201 Littleton Rd, Suite 225
Morris Plains NJ 07950

Direct 201-213-6804

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From: Hal Soden, Jr.
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 12:15:26 PM
Attachments: image001.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png
image009.png
image010.png
image011.png

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Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Hal
Harold W. Soden, Jr., CPCU, AAI, CIC, CMIP, CRM, CWCA
Principal / Risk Advisor | Oliver L.E. Soden Agency

732-521-0001
hwsoden@sodeninsurance.com
https://sodeninsurance.com/
680 Branch Ave., Little Silver, NJ 07739

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From: lrunyon56@aol.com
To: Fish, David [DOL]
Subject: [EXTERNAL] Independent Contractor Bill
Date: Tuesday, August 5, 2025 12:25:22 PM

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- Dear Mr. Fish,

  I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like me.

  Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

  Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

  At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

  I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

  Thank you for the opportunity to comment.

  Lauren Runyon
  Siggins & Runyon Inc
  Basking Ridge NJ

From: Brian Sutera
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 12:28:34 PM

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Dear Mr. Fish, I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself. Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition. Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine. At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption. I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve. Thank you for the opportunity to comment.

Regards,
Brian Sutera

Renewal Manager
KHD, LLC
P.O. Box 204
Succasunna, NJ 07876
brian@khdllc.com
ph. 973-316-1680 X206
Fax. 973-316-1687

NOTE: All trucks and drivers must be added to your policy prior to dispatch.

From: Theodore Keller
To: Fish, David [DOL]
Subject: [EXTERNAL] Independent Agent
Date: Tuesday, August 5, 2025 12:38:56 PM
Attachments: image001.png
image002.png
Comment Regarding Proposed Worker Classification Rule.docx

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Hi Dave, please see attached letter concerning language that effects Independent Agent.

Thank you

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Theodore W. Keller, CLCS
Owner | Commercial Lines Manager

p: 856-464-9899 | **f:** 856-468-3804
e: tkeller@kellerinsurance.com | **w:** www.kellerinsurance.com/
a: 1107 Mantua Pike, Suite 706, West Deptford, NJ 08051

Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

THEODORE W KELLER
OWNER
RP KELLER SR INSURANCE AGENCY INC, TA KELLER INSURANCE SERVICES
WEST DEPTFORD, NJ

From: Edmar Ortiz
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 12:52:50 PM

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Report Suspicious

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.
--
Edmar Daniel Ortiz
President & Principal Insurance Producer
Garden State Central Insurance Services
1028 US Highway 206 Suite 3 Bordentown, NJ 08505
(609) 534-7194 | www.gsc-insurance.com

Garden State Central
Insurance Services

From: jean.allan222@gmail.com
To: Fish, David [DOL]
Subject: [EXTERNAL] Comments RE: PRN 2025-051 ABC Test Independent Contractors
Date: Tuesday, August 5, 2025 12:54:05 PM

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Dear Executive Director Fish,

I am a 63 year old resident of Sussex county. I am expressing my strong opposition to PRN 2025-051 ABC Test for Independent Contractors.

I have worked as both a full time employee and independent contractor through out my long career as a phamaceutical copywriter. Being an independent contractor allowed me to maintain a flexible schedule while raising my children and caring for elderly parents while still working and generating income.

Now at the end of my career, I am independent again. I have been told by potential employers that because I live in NJ, I am not preferred due to the need to offer W-2 related status and benefits. They will hire other remote workers in other states instead of me. This is under the current definition which is less strict than the proposed. The new rules proposed under PRN 2025-051 impose an even stricter definition and thus will hurt more NJ workers than it helps.

Of course companies should not be able to use Independent contractor status to avoid paying taxes and benefits. This can be done with proper oversight and enforcement, not total transformation of these work definitions.

Thank you.
Jean Allan
47 South Shore Trail
Sparta, NJ 07871

From: Jack Spehn
To: Fish, David [DOL]
Cc: Lena Simet
Subject: [EXTERNAL] Letter from Human Rights Watch on Proposed New Rule Regarding Independent Contractors
Date: Tuesday, August 5, 2025 12:56:32 PM
Attachments: Outlook-n0v3ro4h
Human Rights Watch Letter to New Jersey DOL (1).pdf

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Dear Director Fish,

I hope this message finds you well. Please see attached a letter from Lena Simet, senior researcher and advocate in the Economic Justice and Rights Division at Human Rights Watch, commenting on the NJ Department of Labor and Workforce Development's proposed rule codifying New Jersey's statutory "ABC test" for determining independent contractor status (N.J.A.C. 12:11).

Human Rights Watch thanks the Department for its leadership in advancing this rule. We strongly support its adoption and view it as a vital step toward protecting the rights of platform workers.

Sincerely,
Jack Spehn

HUMAN RIGHTS WATCH
HRW.org

Jack Spehn
Senior Associate, Economic Justice and Rights Division
Phone: +1 (332) 323-4782
Email: spehnj@hrw.org
Washington, DC
www.hrw.org

Attachment Outlook-n0v3ro4h (10793 Bytes) cannot be converted to PDF format.

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August 5, 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

Re: *Proposed New Rule Regarding Independent Contractors: N.J.A.C. 12:11 – Support* 57 N.J.R. 894(a), Vol. 9 (May 5, 2025)

Dear Director Fish:

Human Rights Watch welcomes the opportunity to comment on the NJ Department of Labor and Workforce Development's proposed rule codifying New Jersey's statutory "ABC test" for determining independent contractor status (N.J.A.C. 12:11). Human Rights Watch is an international human rights organization that conducts research and advocacy in more than 90 countries around the world, including the United States. We work on a range of issues at the intersection of business, technology, and human rights, including the rights of workers in the app-based platform economy.

We write in strong support of the Department's proposed rule N.J.A.C. 12:11. Based on our analysis of international human rights law and our research on the lived experiences of platform workers in the United States, this rule represents a critical step towards addressing systematic misclassification, whereby workers are treated as independent contractors despite performing work that meets the legal definition of employment. This harmful business practice denies millions of workers their rights and protections.

The ABC test is a legal standard used under New Jersey law to determine whether a worker is an employee or an independent contractor for the purposes of state labor protections. To qualify as an independent contractor, a worker must meet all three prongs of the test: they must (A) be free from control or direction, (B) perform work outside the usual course or place of the business, and (C) be engaged in an independently established business.

Misclassification deprives workers of many of their labor rights, undermines fair competition among businesses, and contributes to economic inequality. It also undermines the enforcement of laws intended to ensure decent working conditions.

In our investigation into labor rights violations in app-based work, published in May 2025, Human Rights Watch surveyed 127 platform workers in Texas and conducted in-depth interviews with 95 individuals working in rideshare, food delivery, and grocery shopping across seven major companies: Uber, Lyft, DoorDash, Instacart, Shipt, Favor, and Amazon Flex – many of which operate in New Jersey.[1] Our findings indicate that platform workers are routinely misclassified as independent contractors, excluding them from key protections such as wage and hour laws and access to social protection. Meanwhile, the companies that hire these workers evade obligations to contribute to unemployment insurance, Social Security, Medicare, and state-level insurance programs, as well as to comply with employment standards.

According to our survey, workers earned, including tips, an average of just $5.12 per hour after expenses, approximately 30 percent below the federal minimum wage for employees and 70 percent below a living wage in Texas. Seventy-five percent of workers we surveyed said they had struggled to pay for housing in the past year. Thirty-five percent said they couldn't cover a $400 emergency expense. Over a third had been in a work-related car accident. Many said they sold possessions, relied on food stamps, or borrowed from family and friends to get by. A majority lacked health insurance or relied on Medicaid.

Misclassified platform workers also lack access to paid sick leave, workers' compensation for job-related injuries, and safeguards against arbitrary dismissal. In our survey, 40 of the 127 workers reported having been "deactivated," effectively terminated, by a platform through opaque, often automated systems, with little or no explanation and avenues for appeal. Nearly half of those deactivated were ultimately cleared of wrongdoing, raising serious concerns about due process and fairness.

Misclassification also strips workers of the right to organize and bargain collectively. Several workers we interviewed had attempted to unionize or protest unsafe conditions but faced legal and structural barriers in the absence of employee recognition.

At the same time, several platform companies have reported record revenues and profits. In 2024, Uber reported $43.9 billion in revenue and nearly $10 billion in net income, calling the fourth quarter its "strongest ever."[2] DoorDash earned $10.72 billion in revenue, up 24 percent from the previous year.[3] Combined, these two companies' market valuation exceeds $250 billion.[4] These financial gains are built in part on a business model that shifts operating costs and economic risks to workers, while circumventing tax and labor obligations through

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[1] Human Rights Watch, *The Gig Trap: Algorithmic, Wage and Labor Exploitation in Platform Work in the US*, (New York: Human Rights Watch, 2025), https://www.hrw.org/report/2025/05/12/the-gig-trap/algorithmic-wage-and-labor-exploitation-in-platform-work-in-the-us. Texas was selected as the primary research location for several reasons: it is the second most populous US state, and home to some of the largest cities; it ranks among the lowest in adequate labor protection indicators; and there is a notable gap in research on platform work in the southern US. To our knowledge, our report is the first comprehensive study documenting the conditions of platform workers in Texas.

[2] Uber Investor, "Uber Announces Results for Fourth Quarter and Full Year 2024," February 5, 2025, https://investor.uber.com/news-events/news/press-release-details/2025/Uber-Announces-Results-for-Fourth-Quarter-and-Full-Year-2024/default.aspx (accessed August 5, 2025).

[3] "DoorDash Releases Fourth Quarter and Full Year 2024 Financial Results," DoorDash news release, February 11, 2025, https://ir.doordash.com/news/news-details/2025/DoorDash-Releases-Fourth-Quarter-and-Full-Year-2024-Financial-Results/default.aspx (accessed August 5, 2025).

[4] See "Market capitalization of Uber (UBER)," webpage, https://companiesmarketcap.com/uber/marketcap/ (accessed August 5, 2025), and "Market capitalization of DoorDash (DASH)," webpage, https://companiesmarketcap.com/doordash/marketcap/#google_vignette (accessed August 5, 2025).

misclassification. Human Rights Watch estimates that misclassification of platform workers in rideshare, food delivery, and in-home services cost Texas over $111 million in foregone unemployment insurance contributions only between 2020 and 2022. In 2019, an audit of your Department uncovered that Uber and a subsidiary owed the state $530 million in back taxes that had not been paid for unemployment and disability insurance from 2014 to 2018, due to misclassification of platform workers.[5]

This is not a problem confined to one state. Many of the companies profiled in our research operate in New Jersey, where they use the same harmful misclassification practices.

Codifying the ABC test through the proposed rule and placing the burden of proof on the employer to treat such workers as employees would help address worker misclassification by ensuring clearer, more consistent application of the law and strengthening the Department's ability to enforce employment protections.

Clarifying Longstanding Law

The ABC test is firmly rooted in New Jersey statute and affirmed by the state's highest courts.[6] Yet in practice, its application has often been uneven and misclassification persists, and technology has reshaped work relationships. By translating legal standards into a clear and accessible regulatory framework, the Department's proposed rule would fill this gap and help ensure proper classification under the law, allowing workers across New Jersey to access the human rights and labor rights to which they are entitled.

1. Prong A: Control and Direction

Prong A of the ABC test examines whether a worker has been and will remain free from control or direction in performing their work. The proposed rule (N.J.A.C. 12:11-1.3(a)) clarifies that this includes both actual control and the employer's reserved right to control. Even partial or indirect control over how services are performed is incompatible with independent contractor status. The rule sets out a range of indicators in N.J.A.C. 12:11-1.3(c), such as whether the employer sets work hours, directs the means of performing services, restricts outside work, or provides training or supervision, that reflect the substantive nature of the working relationship.

This is very relevant for platform work. Human Rights Watch's research finds that companies like Uber, Lyft, DoorDash, Instacart, and Amazon Flex exert extensive control over workers by not disclosing to them many of the system rules that govern their working patterns and environment. For instance, many platform companies unilaterally set pay rates and frequently adjust them via opaque algorithms. With the exception of Amazon Flex, all the platform companies that Human Rights Watch investigated use dynamic pricing models that adjust pay in real time, with no transparency for workers around the criteria or weighting of factors contributing to dynamic pricing algorithms, and no way to challenge these decisions. None of the seven US-based platform companies that Human Rights Watch investigated allow workers to

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[5] Matthew Haag and Patrick McGeehan, "Uber Fined $649 Million for Saying Drivers Aren't Employees," *New York Times,* November 14, 2019, https://www.nytimes.com/2019/11/14/nyregion/uber-new-jersey-drivers.html (accessed August 5, 2025).

[6] The ABC test has been part of New Jersey's statutory framework since at least 1942. See *Electrolux Corp. v. Bd. of Rev. (Unemployment Comp. Comm'n)*, 129 N.J.L. 157 (1942). Its interpretation has been further developed by the New Jersey Supreme Court, with two leading cases frequently cited by the Department: *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).

have full knowledge of one of the fundamentals in a contract: their rate of pay, or to negotiate that rate.

Workers must also meet performance metrics to access assignments, including maintaining high customer ratings, accepting a minimum percentage of jobs, and completing tasks within set parameters established by their employer. Platforms rarely explain how these metrics are weighted or calculated. Falling below thresholds can result in fewer or less desirable assignments, reduced pay, or removal from a platform, creating algorithmic discipline that replaces direct human supervision – and leaves workers without an adequate complaints mechanism to challenge decisions that have a direct bearing on their income and livelihood.

These systems are intentionally designed to deprive workers of meaningful control over their schedules, routes, rates, and customer interactions. Platform workers cannot make informed decisions about their workloads or operations as an independent business or freelance contractor would. Instead, platform workers' income is shaped not by entrepreneurial decision-making, but by algorithmic decisions set and managed by platform companies and shifting demand that is ultimately designed by the companies to benefit their bottom line.

These practices reflect multiple control indicators under N.J.A.C. 12:11-1.3(c), including employer-set hours or rates, performance standards, limits to external work, and reliance on proprietary tools or technology. In platform work, all are present. This rule would help clarify that platform workers are misclassified and should be classified as employees, because control, whether direct, indirect, manual, or algorithmic, precludes meeting Prong A.

2. Prong B: Work Outside the Usual Course or Places of Business

The Department's proposed rule would clarify how Prong B of the ABC test applies to platform workers by defining "usual course of business" and "places of business" (N.J.A.C. 12:11-1.4). Under this prong, an employer must show that the worker's services are either outside the company's usual course of business, or entirely outside its places of business. The rule defines "usual course of business" as the revenue-generating activities a company routinely engages in (1.4(b)), and "places of business" to include mobile and decentralized worksites, such as vehicles or customer locations, where those services are delivered (1.4(e)–(g)).

This clarification is also relevant in the platform economy, where companies have sought to distance themselves from the very workers performing their core functions. Uber, Lyft, DoorDash, and Instacart all market themselves as transportation or delivery providers or tech companies, yet they rely entirely on gig workers to perform those services. These workers drive, deliver, and shop; the exact activities from which these companies derive revenue. Their work clearly falls within the company's usual course of business.

They also perform these services in locations the rule identifies as "places of business" under 1.4(g)(3)(iii). While workers use their own cars or bikes, they do so through platform apps, following company procedures and engaging with customers in environments shaped by the platform's rules. These mobile, customer-facing spaces are where services are delivered, and business is conducted.

Here too, the clarification would help address misclassification, as platform companies would fail both parts of Prong B. Gig workers perform the companies' central functions, in locations that qualify as the company's workplaces. The rule provides the example of rideshare drivers, clarifying that these workers are not tangential, they are the business.

3. Prong C: Independently Established Business

The Department's proposed rule also provides clarification on Prong C, which assesses whether a worker is "customarily engaged in an independently established trade, occupation, profession, or business" (N.J.A.C. 12:11-1.5(a)). To satisfy this prong, the worker must operate a business that exists and can continue to exist independently of the specific service relationship at issue. This means a stable, self-sustaining enterprise (1.5(f)).

Our research finds that few, if any, platform workers would meet this standard. None of the workers we interviewed or surveyed set their own rates, advertise their services, maintain independent business infrastructure, or cultivate a distinct client base. Rather, they access work solely through apps that control pricing, rates of pay, assign jobs, process payments, and retain unilateral control over deactivation. These are not hallmarks of independent entrepreneurship, they are features of contingent labor subject to control.

Some platform workers may choose to register as an LLC or purchase additional liability insurance. But these are not indicators of real independence. The proposed rule rightly clarifies that registering a business, holding insurance, or working for multiple companies does not in itself demonstrate independent contractor status, especially when such steps are encouraged or required by the employer (1.5(g)-(h)).

Many platform workers use a single platform for the bulk of their income, with no parallel revenue streams and no ability to absorb or pass on operating costs like gas, parking, or safety gear. Most cannot negotiate rates or offer services to customers independently.

Prong C therefore also offers helpful criteria to address misclassification, as the realities of platform work stand in contrast to the standards set out in the rule, including setting one's own pay (1.5(b)(6)), maintaining a visible business presence (1.5(b)(7)), and serving multiple meaningful clients (1.5(b)(2)).

Elevating Substance Over Form

The Department's proposed rule rightly affirms that employment status must be based on the actual dynamics of the working relationship, not on contracts or tax filings (N.J.A.C. 12:11-1.6(a)). The rule states that neither a 1099 form nor an "independent contractor" agreement is determinative in assessing employment status (1.6(b)–(c)). This clarification is especially important where workers lack bargaining power and where companies structure relationships to avoid responsibility, not reflect actual conditions.

Human Rights Watch research shows that platform companies routinely rely on standardized agreements and 1099 tax filings to claim workers are independent contractors, even as they retain unilateral control over core aspects of the job. Workers we interviewed did not have the ability to negotiate contracts, they accepted standardized terms through app interfaces, often without a clear understanding of their legal significance. Many told us they felt they had no alternative if they wanted to work for a given platform.

By codifying a substance-over-form approach, the proposed rule strengthens the enforcement of worker protections and ensures that companies cannot sidestep their obligations through formalities. It grounds the ABC test in the real-world dynamics of control, dependence, and economic power.

Human Rights Watch thanks the Department for its leadership in advancing this rule. We strongly support its adoption and view it as a vital step toward protecting the rights of platform workers.

Sincerely,

Lena Simet, Ph.D.
Senior Researcher and Advocate
Economic Justice and Rights Division
Human Rights Watch

From: Rose Romaine
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 1:05:06 PM
Attachments: image001.png

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Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Rose M. Romaine, AAI, ACSR, CIIP
Account Executive
609-599-2588 X105

KWEIDEL INSURANCE
23 South Warren Street
Trenton, NJ 08608

Office: 609-599-2588
Fax: 609-599-2620
http://www.weidelins.com

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From:	Fiorentino Anillo
To:	Fish, David [DOL]
Cc:	Kathry Martinez
Subject:	[EXTERNAL] to David Fish, the Executive Director of Legal and Regulatory Services at New Jersey Department of Labor and Workforce Development to request that N.J.A.C.12:11 includes an exemption for insurance producers.
Date:	Tuesday, August 5, 2025 1:39:44 PM
Attachments:	image.png Action need to be taken.pdf

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Sincerely yours,

Fiorentino Anillo Insurance
Website: fiorentinoanillo.com - Fax: 201-223-2336
Phone: 201-223-2331 - 201-223-2377

P. O. Box 706 | Union City, NJ 07087 Fiorentino@fiorentinoanillo.com
Agency **Portal Address is** https://fiorentinoanillo.com/contact/

Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)

Dear Mr. Fish,

As the owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule.

Independent insurance producers—myself and my team included—have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing. This model benefits consumers, encourages competition, and allows small businesses like mine to serve our communities effectively.

The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers.

I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and their clients across New Jersey.

Thank you for considering my comment.

Name Ramiro Martinez Anillo
Title President
Agency Name Fiorentino Anillo Insurance
City, NJ Union City. NJ - 07087

From:	Grazyna Torbus
To:	Fish, David [DOL]
Subject:	[EXTERNAL] INSURANCE AGENT INDEPENDENT CONTRACTOR
Date:	Tuesday, August 5, 2025 1:41:26 PM
Attachments:	INSURANCE AGENT INDEPENDENT CONTRACTOR.pdf

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Dear Mr. Fish:

Please kindly see the attachment

Please clarify for us independent agents our status as independent contractors

Grazyna (Grace) Torbus
president

Choice Internationa (INSURANCE) Agency Inc.
348 Main Ave
Wallington, NJ 07057
***T:* 973-773-7448**
F: 973-773-7181
grace@choiceagencyins.com
royalcrownrealty@aol.com

CHOICE INT. (INSURANCE) AGENCY INC.

348 Main Ave, Wallington, NJ 07057
T: 973-773-7448 F: 973-773-7181
e-mail: Grace@Choiceagencyins.com

Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)

Dear Mr. Fish,

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Thank you for considering my comment.

Grazyna Torbus

President

Choice International Agency Inc.

From:	Wright, Thomas [DOL]
To:	Fish, David [DOL]
Cc:	Asaro-Angelo, Robert [DOL]
Subject:	Fw: [EXTERNAL] Public Comment – Worker Classification Rule Proposal
Date:	Tuesday, August 5, 2025 1:43:27 PM
Attachments:	The Independent Worker Fairness, Safety, and Protection Act .pdf

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From: DOL-Media [DOL] <Media@dol.nj.gov>
Sent: Tuesday, August 5, 2025 11:31 AM
To: DOL Media <MediaGrp@dol.nj.gov>
Subject: FW: [EXTERNAL] Public Comment – Worker Classification Rule Proposal

---

From: Veronica Ovalles-Taveras <veronicaovalles@alumni.montclair.edu>
Sent: Tuesday, August 5, 2025 3:28:21 PM (UTC+00:00) Monrovia, Reykjavik
To: DOL-Constituent Relations [dol] <ConstituentRelations@dol.nj.gov>; GOV Constituent Relations [gov] <Constituent.Relations@nj.gov>; DOL-Media [DOL] <Media@dol.nj.gov>; senbucco@njleg.org <senbucco@njleg.org>; asmdunn@njleg.org <asmdunn@njleg.org>; asmbarranco@njleg.org <asmbarranco@njleg.org>; gov.correpondence@nj.gov <gov.correpondence@nj.gov>; Veronica Ovalles-Taveras <ovallestavv1@montclair.edu>
Subject: [EXTERNAL] Public Comment – Worker Classification Rule Proposal

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Dear Commissioner Robert Asaro-Angelo and New Jersey Department of Labor Officials, Governor Murphy, Senator Bucco, and Assemblymembers Dunn & Barranco,

My name is Veronica Ovalles-Taveras, and I am a rideshare driver, mother, and lifelong resident of West Milford, Passaic County. I am writing to formally submit a public policy proposal titled:

"The Independent Worker Fairness, Safety, and Protection Act."

This driver-led proposal offers a fair and legally sound alternative to the proposed reclassification of gig workers under the ABC test. Rather than forcing app-based drivers into rigid employment, this plan preserves our independence while mandating meaningful protections, including fair pay, accident insurance, access to benefits, due process, and most importantly, driver safety.
As frontline workers, we face daily dangers: carjackings, assaults, deactivations without cause, and economic instability while billion-dollar platforms take 50%–70% of rider fares. This proposal addresses those harms directly while creating economic and public safety benefits for the State of New Jersey.
Modeled after successful policies in New York City, California, and Washington State, it includes enforceable standards for transparency, guaranteed wage floors, and optional licensing access (such as expedited firearm permit eligibility for drivers under lawful use and NJ standards). It empowers the state to protect workers without sacrificing flexible income

streams that thousands of families rely on.
I respectfully urge your offices to review the attached proposal and engage with the driving community before advancing any rule that could strip away our livelihoods in the name of reclassification.

Please find the full proposal attached.
Thank you for your time and public service.

Sincerely,
Veronica Ovalles-Taveras
West Milford / Passaic County
Uber/Lift Driver | Mother | Voter | Advocate

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Proposal:

The Independent Worker Fairness, Safety, and Protection Act

A Comprehensive Policy Proposal for App-Based Drivers in New Jersey

Submitted by: Veronica Ovalles-Taveras

Date: August 5, 2025

Status: New Jersey Resident | Uber/Lyft Driver | Advocate

Subject Line: Public Comment – Worker Classification Rule Proposal

Dear Commissioner Robert Asaro-Angelo and New Jersey Department of Labor Officials,

I respectfully submit the following policy proposal in response to New Jersey's current worker classification rule-making process. As a rideshare driver and concerned resident, I ask that you consider this driver-led initiative entitled:

"The Independent Worker Fairness, Safety, and Protection Act."

Rather than forcing app-based drivers into rigid employment through the ABC test, this plan offers a legally sound, balanced alternative that protects flexibility, ensures fair pay, introduces vital safety reforms, and strengthens New Jersey's economic infrastructure.

This proposal reflects the lived experience of thousands of drivers who serve the public every day, often at great personal risk, with minimal protection or recourse. I urge the Department of

Labor and our state leaders to adopt this plan as a bold model of reform that balances innovation, safety, and justice.

Sincerely,

Veronica Ovalles-Taveras

West Milford / Passaic County

Uber/Lift Driver | Mother | Voter | Advocate

Executive Summary

Over 1.7 million residents in New Jersey rely on freelance or app-based work to survive. Among them, rideshare drivers face:

- Deeply unfair pay structures
- Lack of legal protections or benefits
- Exposure to assault, robbery, carjackings, and even murder
- Zero due process when falsely accused or deactivated

The proposed use of the ABC test would reclassify many drivers as employees, but that shift alone does not address safety, flexibility, or fairness, and may further reduce job opportunities, especially for part-time and vulnerable workers.

This proposal offers a viable alternative: the creation of a new legal worker classification, the "Independent Platform Worker" , with built-in rights, protections, and standards, including safety infrastructure, wage fairness, and public accountability.

Policy Proposal Title:

The Independent Worker Fairness, Safety, and Protection Act

Purpose:

To establish a third legal classification for New Jersey rideshare and app-based workers that guarantees:

- Worker independence and schedule flexibility
- Minimum earnings standards
- Portable benefits
- Safety and legal protections
- Transparency and accountability from billion-dollar platforms

Legal Basis:

All provisions in this proposal are fully within the scope of state law. No request in this document seeks to:

- Violate existing constitutional rights
- Mandate illegal surveillance or weapon use
- Require unlawful financial contributions
- Conflict with federal labor or employment statutes

New Jersey has full authority to define worker classifications, set wage floors, regulate business licensing, and establish safety mandates. These proposals are consistent with practices already implemented in New York City (TLC driver rules), Washington State, and under Prop 22 (California's modified model).

Background

Rideshare platforms such as Uber and Lyft currently:

- Take up to 70% of the passenger fare
- Avoid providing any healthcare, safety coverage, sick time, or due process
- Shift all vehicle, fuel, insurance, and risk costs to the driver
- Offer no live support during life-threatening incidents (e.g., stabbings, robberies, carjackings)

App-based drivers operate without public protections, without legal representation, and with no seat at the table, even though they serve the public daily.

Key Components of the Proposal

1. Independent Platform Worker Classification

- Drivers retain independent contractor status
- Drivers set their own hours, locations, and multi-platform preferences
- Platforms cannot force exclusivity, shifts, or route control

2. Mandatory Fare and Pay Transparency

Platforms must disclose to drivers:

- What the rider pays
- What the platform takes
- What the driver receives
- Real-time estimates of:

(1) Mileage

(2) Time

(3) Net earnings per ride

3. Minimum Earnings Floor

The State shall establish a statutory pay floor for drivers under this classification:

- $1.30 per mile driven

- $0.50 per minute of active driving time
- No unpaid cancellations, wait times, or reassignments
- Rates shall be adjusted annually for inflation

These rates are modeled after NYC's TLC law and remain within state authority to define wage floors for independent labor.

4. Portable Benefits Fund

Platforms shall contribute 7% of gross fare revenue to a state-managed fund, which drivers may use for:

- Health insurance reimbursement
- Paid sick days
- Emergency relief
- Disability or retirement savings
- Mental health services

This is modeled after Washington State and Prop 22's portable benefit systems.

5. Fair Deactivation & Due Process Protections

Drivers must be:

- Notified in writing of the specific reason for any suspension or deactivation
- Given access to any rider complaints or platform data used against them

- Allowed to appeal to a state-supported neutral review board
- Protected from retaliation for making safety or wage complaints

6. Multi-App Worker Rights

- Drivers may freely operate across multiple platforms
- No driver may be penalized for “multi-apping”
- Drivers cannot be coerced into exclusive contracts

7. Collective Driver Representation

- Drivers may form non-union representation groups or advocacy councils
- The State shall formally recognize such groups to:

(1) Review fare policies

(2) Address safety complaints

(3) Advocate on behalf of platform workers

8. Driver Safety and Dignity Protections

Drivers face real and frequent physical danger. This proposal mandates the following safety infrastructure:

A. Mandatory Platform Safety Tools

- In-app panic button linked to 911
- Real-time GPS sharing with emergency contacts
- Verified rider identity (photo and phone verification)
- Right to cancel unsafe trips without penalty

B. Trip Information Disclosure

- Drivers must see full fare estimate, pickup/drop-off, and passenger rating before accepting
- Optional “night shift,” “women-only,” or “location restriction” preferences

C. Violence Insurance Coverage

Platforms must carry commercial insurance covering:

- Medical costs
- Death or disability
- Trauma recovery
- Lost wages due to on-the-job assault

D. De-escalation and Self-Defense Support

Platforms shall:

- Offer or reimburse dashcams, pepper spray, barriers
- Provide free training on conflict de-escalation and personal safety

E. Driver Victim Memorial Fund

- Establish a state fund and memorial for drivers killed or seriously injured while working
- Provide emergency grants to families of deceased drivers
- Publish quarterly safety reports with transparency on violent incidents

Optional Provision (For Legislative Consideration):

"Defensive Access for Verified App-Based Drivers"

New Jersey should explore a legal pathway for qualifying app-based drivers to:

- Access expedited training and application for legal concealed carry or non-lethal self-defense tools
- Receive discounted permit fees
- Be offered optional safety training co-funded by the State and platform companies

This remains voluntary, strictly licensed, and must follow all NJ firearm laws. No driver would be required or encouraged to carry, but access must exist for those who face real danger.

Benefits to the State of New Jersey

This model:

- Preserves job access and flexibility for over 1.7 million workers
- Generates taxable, trackable earnings and reduces wage theft
- Lowers pressure on public health and unemployment systems
- Improves public safety by formalizing driver training and insurance
- Reduces legal risk for the state by proactively regulating worker rights
- Positions New Jersey as a national leader in gig economy reform

Call to Action

We, the undersigned drivers, voters, and families of New Jersey, demand that the State:

- Reject forced reclassification under the ABC test
- Adopt a fair, balanced solution that protects flexibility and fairness
- Listen to the voices of drivers who are risking their lives daily, not billion-dollar corporations

From: Carmen Cajilema
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 1:43:36 PM
Attachments: image001.png

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Dear Mr. Fish,

As the owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule.

Independent insurance producers, my team and I included have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing. This model benefits consumers, encourages competition, and allows small businesses like mine to serve our communities effectively.

The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers.

I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and their clients across New Jersey.

Thank you for considering my comment.

Regards,

Carmen Cajilema-Simpson
President
600 Valley Road Ste #208, Wayne NJ 07470
O: (201)472-5557
E: carmenc@csis-ins.com
www.Cajilemasimpsoninsurance.com

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From: Donald Hess
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11) - Independent Insurance Agents
Date: Tuesday, August 5, 2025 1:44:19 PM
Attachments: image001.png

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Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the above captioned proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That is important, but this distinction needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Best regards,
Donald Hess

Donald M. Hess, AAI

The Hess Group, Inc.

I N S U R A N C E

95 Mt. Bethel Road

Warren, NJ 07059

Phone (908)561-0500 Fax (908)561-3250

Donald@hessgroup.net

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From:	Christine Catalano
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date:	Tuesday, August 5, 2025 1:45:12 PM
Attachments:	abc test - insurance producers.docx

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Please see attached.

Thank you and stay well,

Christine Cool-Catalano, CISR
Colonial Insurance Agency
732-203-1200
My hours are:
Tues- Fri 8am-2pm

Insure NJ Services LLC, dba Colonial Insurance Agency
PO Box 1
Keyport, NJ 07735

August 5, 2025

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

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Thank you for the opportunity to comment.

Christine Cool- Catalano
CISR
Colonial Insurance Agency
Keyport, NJ 07735

From: Sam Wierman, Jr.
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 1:53:05 PM

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RE: Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)

Dear Mr. Fish,
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Thank you for considering my comment.

-Samuel Wierman
Owner
Ide Insurance Agency
Stone Harbor, NJ 08247

IDE INSURANCE AGENCY
9720 Third Avenue, Suite 2A
Stone Harbor, NJ 08247
(609) 368-2727
www.ideinsurance.com

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From:	Violet Korczak
To:	Fish, David [DOL]
Cc:	Stephen Pers
Subject:	[EXTERNAL] Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date:	Tuesday, August 5, 2025 1:53:50 PM
Attachments:	image001.png COMMERCI.RTF

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Stephen J Pers
President
Sypek & Sandford Agency Inc.

609-896-7000 Ext. 7107 (P)
spers@sypekandsandford.com

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Fax: 609-896-0691

10 Canal Street
Suite 204
Bristol Pa 19007
Phone: 215-245-5615
Fax: 215-781-6437

www.sypekandsandford.com

August 5, 2025

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I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

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Thank you for the opportunity to comment.

Stephen J Pers

Stephen J. Pers

President
Sypek & Sandford Agency, Inc.
Lawrenceville, NJ 08648

From: Brian Durkin
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment regarding Proposed Worker Classification Rule (NJAC 12:11)
Date: Tuesday, August 5, 2025 1:56:49 PM

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Dear Mr. Fish,

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Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Brian F. Durkin, AAI
Agency Partner

Acrisure NJ
65 Harristown Road, Suite 209
Glen Rock, NJ 07452
BFDurkin@Acrisure.com
(201) 567-3700, ext 3124

From:	Richard C Jones
To:	Fish, David [DOL]
Subject:	[EXTERNAL] RE: Proposed New Rules: N.J.A.C. 12:11 – ABC Test; Independent Contractors
Date:	Tuesday, August 5, 2025 1:57:26 PM
Attachments:	image001.png Guardian_Life_-_NJ Independent Contractor Proposed Rule.docx.pdf

---

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Mr. Fish,

The Guardian Life Insurance Company of America respectfully submits the attached letter in relation to the proposed Independent Contractor regulation.

Regards,

Richard Jones
Vice President, State Affairs
O: 212 598 8338
M: 914 330 1006
Richard_Jones@GLIC.com
guardianlife.com

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From: [redacted]
To: Fish, David [DOL]
Subject: Re: [EXTERNAL] N.J.A.C. 12:11 ABC Test Independent Contractors
Date: Tuesday, August 5, 2025 2:06:28 PM

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thank you for your response, could you let me know who or where to send the letter of support to, thanx ,[redacted]

On Tuesday, August 5, 2025 at 11:52:29 AM EDT, Fish, David [DOL] <david.fish@dol.nj.gov> wrote:

> Thank you, Mr. [redacted] Unfortunately, it would inappropriate under the Administrative Procedures Act for me to speak with you (or anyone) about the rule proposal during the comment period. I understand your request to submit a confidential letter of support for the rule proposal. I can assure you that if you indicate within the body of such a letter that you would prefer anonymity, the Department will honor that request and refrain from referring to you by name within the body of any public rulemaking notice.
>
> Sincerely,
>
> David Fish
>
> Executive Director
>
> Legal and Regulatory Services
>
> ---
>
> **From:** [redacted]
> **Sent:** Monday, August 4, 2025 6:46 PM
> **To:** Fish, David [DOL] <David.Fish@dol.nj.gov>
> **Subject:** [EXTERNAL] N.J.A.C. 12:11 ABC Test Independent Contractors
>
> hi david, sorry for last minute, have not been able to find an objective public comment location for this, last day is aug 6th. all links i have seen or have been inundated with from my franchisor and professional organizations, are links to send pre written letters against the rule proposal.

i believe i am in support of the rule proposal.

i have had my financial planning practice for aprox 30yrs. first we were a division of american express, american express financial advisors, then we spun off from amex and became ameriprise financial.

ameriprise has 2 sides, employees and "franchisees" (independent contractors)

over the years there has been an obvious consolidation of control over the franchise side to emulate employees, yet insisting we are independent contractors. most infringements and violations seem to fall under the guise of "company policy".

i would like to talk/register my comments to someone regarding this continuous and increasing structure of " control everything, own nothing"

it may be beneficial to speak before the voting happens on the new rule proposal N.J.A.C. 12:11, ABC Test: Independent Contractors

i request a discreet and confidential meeting/conversation/letter of support ,for the rule.

this is my personal email and i request all communications through this email and not my office.

for background on me, [redacted] and i am on linked in .

thank you for your attention

have a great day, [redacted]

[redacted]

[redacted]

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From:	Sally Dworak-Fisher
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Proposed New Rules: N.J.A.C. 12:11
Date:	Tuesday, August 5, 2025 2:06:49 PM
Attachments:	NELP comment ISO NJ ABC Rule 2025 - SUPPORT.pdf

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Dear Director Fish:

Attached please find the attached comment in support of NJDOL's proposed new rules regarding application of the state's statutory "ABC test" by the National Employment Law Project.

We would appreciate confirmation that the comment was timely received.

Thank you,

Sally Dworak-Fisher

NELP NATIONAL EMPLOYMENT LAW PROJECT

Sally Dworak-Fisher, **(she/her)**
Senior Staff Attorney
National Employment Law Project
Phone: 202-869-3287 | E-mail: sdworak-fisher@nelp.org

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NELP NATIONAL EMPLOYMENT LAW PROJECT

Rebecca Dixon
President and
Chief Executive Officer

National Office
PO Box 1779
New York, NY 10008
212-285-3025
www.nelp.org

August 5, 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* - **SUPPORT**

Dear Mr. Fish and Members of the Department of Labor and Workforce Development:

The National Employment Law Project ("NELP") submits this comment in support of the proposed regulation by the New Jersey Department of Workforce Development Department ("Department") codifying its interpretation of the state's long-standing statutory "ABC test." 57 N.J.R. 894(a), Vol. 9 (May 5, 2025) (interpreting N.J.S.A. § 43:21-19(i)(6)(A) - (C)).

NELP is a nonprofit research and policy organization with more than 55 years of experience advocating for the employment and labor rights of low-wage workers. The organization is dedicated to building a good-jobs economy—one rooted in worker power, racial and economic justice, and the fundamental belief that every job should be a good job. As an essential aspect of its work, NELP seeks to ensure that all employees, and especially the most vulnerable ones, receive the basic workplace protections guaranteed in labor and employment laws. NELP has litigated on behalf of subcontracted workers called "independent contractors," submitted amicus briefs in numerous independent contractor cases, testified in Congress regarding the importance and scope of employment coverage, and is an expert in independent contractor misclassification, its magnitude, and its impacts. We appreciate the opportunity to comment on the proposed regulation.

We write to make 3 points:

1. Misclassification is a serious problem nationally and in New Jersey, stripping underpaid workers of essential protections, degrading working conditions, undermining law-abiding businesses, and depleting state revenue;
2. New Jersey's well-established "ABC test" law provides a strong bulwark against independent contractor misclassification, similar to dozens of other states; and
3. The proposed regulation (or "rule") helps clarify the analysis, thereby ensuring better compliance and limiting harmful misclassification.

1. **Misclassification is a serious problem, stripping workers of essential protections, degrading working conditions, undermining law-abiding businesses, and depleting state revenue.**

Employers that misclassify their employees as independent contractors strip them of bedrock employment rights, including but not limited to the right to minimum wage and overtime, the right to a healthy and safe workplace, and the right to unionize to improve working conditions. Misclassifying businesses also shirk their responsibilities to pay into social insurance funds, exclude workers from critical state social insurance programs like unemployment insurance and workers' compensation, and they transfer the employer payments of payroll taxes that fund Social Security and Medicare to their workers.

A. *Misclassification Particularly Harms Already Underpaid Workers, Nationally and in New Jersey.*

Misclassification costs New Jersey workers dearly, particularly those in several low-paid occupations. As the Economic Policy Institute (EPI) has shown, within occupations, workers classified as independent contractors suffer compensation penalties of more than 20 percent relative to their employee counterparts because they do not get paid overtime, paid leave, workers' compensation, and they lose employer contributions to health insurance and retirement plans.[1] To give just two examples from the EPI analysis:

- A New Jersey home health or personal care aide loses as much as $12,022 per year, or nearly 31 percent of an annual employee salary; and
- A New Jersey janitor loses as much as $10,721 per year, or nearly 30 percent of an annual employee salary.[2]

And the list goes on in heavily misclassified and low paying occupations such as manicurist, maid and residential house cleaner, delivery driver, truck driver, and construction laborer.

Other research confirms that without foundational protections, the earnings of many low-paid independent contractors lag behind the earnings of employees in those same occupations. Indeed, some of these so-called "independent contractors" even make less than the minimum wage for the localities in which they live. For example:

- A study of tax filings of employees and independent contractors in Washington, D.C. from 2010 to 2018 found that a majority of independent contractors (about 60 percent) earn under $22,000 per year.

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[1] EPI analyzed 11 commonly misclassified jobs and found that workers classified as independent contractors in these jobs, which include landscapers, truck drivers, home health aides, janitors, and nail salon workers, lose out on thousands of dollars per year in income and job benefits relative to what they would earn as an employee. Adewale Maye, Daniel Perez, and Margaret Poydock, *Misclassifying workers as independent contractors is costly for workers and states*, ECON. POL'Y INST. (Jan 22, 2025), https://www.epi.org/publication/misclassifying-workers-2025-update/.

[2] *Id.* at Fig. A, New Jersey.

Some of the most common occupations for independent contractors in this income range are janitors, drivers, and hairstylists.[3]

- A study by the University of California-Berkeley found that California construction workers misclassified as independent contractors suffered a 33 percent wage penalty relative to their employee counterparts.[4]
- A national study of digital labor platform workers (such as ridehail, restaurant and grocery delivery workers) found that one in seven earned less than the federal hourly minimum wage, and 30 percent of digital platform workers received a Supplemental Nutrition Assistance Program benefit, compared to 15 percent of employees in comparable service-sector jobs.[5]

Since up to 95 percent of workers who claim to be misclassified are found to be employees after investigation, millions of workers nationally, with untold thousands in New Jersey among them, likely suffer poverty wages and degraded working conditions related to their misclassification as independent contractors.[6]

B. *Misclassification of Underpaid Workers is Strikingly Racialized.*

For low-paid "independent contractors," poverty-level pay is exacerbated by exclusion from social insurance programs like unemployment insurance and employment-related benefits like paid leave, health insurance, and workers' compensation. Such workers live paycheck to paycheck, one accident or illness away from financial disaster, and without the means to even take a break from work much less retire or generate wealth.

The problem is strikingly racialized. Misclassification is a persistent problem in many low-paid occupations where the work is dangerous, isolated, and/or labor intensive, such as home care, janitorial work, trucking, construction, personal services, hospitality, and in most app-dispatched jobs like ridehail and delivery. Black, immigrant, and other workers of color—who encounter discrimination and a long history of occupational segregation that too often limits their job opportunities—are overrepresented in these highly precarious occupations. As a group, workers of color are overrepresented in construction, trucking, delivery, home care, agricultural, personal care, ridehail, and janitorial and building service occupations by over 40 percent; they comprise just over a third of workers overall, but between 47 and 91 percent of

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[3] Corey Husak, *The Self-Employment Income Drop*, OFFICE OF REVENUE ANALYSIS OF WASHINGTON, D.C. (Dec. 2022), https://ora-cfo.dc.gov/blog/self-employment-income-drop.

[4] Ken Jacobs and Kuochih Huang, *The Public Cost of Low-Wage Jobs in California's Construction Industry*, UNIVERSITY OF CALIFORNIA-BERKELEY LABOR CTR. (Jun. 2021), https://laborcenter.berkeley.edu/the-public-cost-of-low-wage-jobs-in-the-us-construction-industry/.

[5] Ben Zipperer, Celine McNicholas, Margaret Poydock, Daniel Schneider & Kristen Harknett, *National Survey of Gig Workers Paints a Picture of Poor Working Conditions, Low Pay*, ECON. POL'Y INST. (Jun. 2022), https://www.epi.org/publication/gig-worker-survey/.

[6] *Independent Contractor Misclassification Imposes Huge Costs on Workers and Federal and State Treasuries*, NAT'L EMP. L. PROJECT 3 (Oct. 2020) https://www.nelp.org/app/uploads/2017/12/Independent-Contractor-Misclassification-Imposes-Huge-Costs-Workers-Federal-State-Treasuries-Update-October-2020.pdf, (citing Lalith DaSilva et al., *Independent Contractors: Prevalence and Implications for Unemployment Insurance Programs*, PLANMATICS, INC., PREPARED FOR U.S. DEP'T OF LAB. EMP. AND TRAINING ADMIN. (2000), https://wdr.doleta.gov/owsdrr/00-5/00-5.pdf.) (hereinafter *Huge Costs,* NELP).

workers in these occupations.[7] Because misclassification causes significant wage and benefit penalties, it helps enable racialized income and wealth inequities in the United States.

C. *Misclassification Hurts New Jersey Businesses and State Revenue.*

Misclassification of employees as independent contractors also causes negative ripple effects in the community. Cheating businesses make it more difficult for law-abiding businesses to compete, especially in the labor-intensive and bid-based jobs: construction, janitorial, home care, delivery, and others. The practice, as the United States Treasury Inspector General found, "plac[es] honest employers and businesses at a competitive disadvantage."[8] Businesses that misclassify their employees pocket between 20 to 40 percent of payroll costs they would otherwise incur for unemployment insurance, workers' compensation premiums, the employer share of Social Security, and health insurance premiums.[9] They pressure their competition to shed labor costs, creating a race to the bottom where firms try to remain competitive by following suit. A 2010 study estimated that misclassifying employers shift $831.4 million in unemployment insurance taxes and $2.54 billion in workers' compensation premiums to law-abiding businesses annually.[10]

Misclassifying employers also cost federal and state governments billions of dollars per year in unreported payroll taxes and unemployment insurance contributions.[11] Recent national estimates are difficult to come by, but a 2009 report by the Government Accountability Office estimated that independent contractor misclassification cost federal revenues $2.72 billion in 2006 dollars, amounting to more than five billion dollars today.[12]

New Jersey's revenues clearly suffer as well. In 2018, New Jersey's audits of employer accounts found more than $462 million in underreported wages, and nearly $14 million in underreported contributions to

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[7] NELP analysis of March 2024 Current Population Survey Annual Social and Economic Supplement microdata. For underlying data, see CPS Annual Social and Economic Supplement, U.S. Census Bureau, https://data.census.gov/app/mdat/CPSASEC2024/vars.

[8] Treasury Inspector General for Tax Administration, *Additional Actions Are Needed to Make the Worker Misclassification Initiative with the Department of Labor a Success* at 1 (2018-IC-R002: Feb. 20, 2018), https://www.tigta.gov/sites/default/files/reports/2022-02/2018IER002fr.pdf.

[9] FranÁoise CarrÈ, *(In)Dependent Contractor*, ECON. POL'Y INST. 5 (Jun. 8, 2015), https://files.epi.org/pdf/87595.pdf.

[10] See Douglas McCarron, *Worker Misclassification in the Construction Industry*, 57 BNA Construction Labor Report 114 (April 7, 2011). See also Michael P. Kelsay, *Cost Shifting of Unemployment Insurance Premiums and Workers' Compensation Premiums*, DEP'T OF ECON., UNIV. OF MO., KAN. CITY 5-6 (Sept. 12, 2010).

[11] *Huge Costs,* NELP, *supra* n. 6 at 2-3.

[12] See U.S. Government Accountability Office, *Employee Misclassification: Improved Coordination, Outreach, and Targeting Could Better Ensure Detection and Prevention* (Aug. 2009), http://www.gao.gov/new.items/d09717.pdf (noting $1.6 billion lost in 1984 dollars). *See also* U.S. Bur. Lab. Statistics, CPI Inflation Calculator, https://www.bls.gov/data/inflation_calculator.htm. Of note, the analysis used by the Internal Revenue Service is a more malleable multi-factor analysis compared to the ABC test.

unemployment, disability, family leave insurance and workforce assessment funds. Such numbers are likely an undercount because audits are required of just 1 percent of registered employers annually.[13]

EPI's analysis further confirms the significant costs to New Jersey. For example, for *each* construction laborer classified as an independent contractor, New Jersey loses a median amount of $3,284 in social insurance funds contributions each year.[14] The state also loses roughly $1,500 for *each* home health care or personal aide, maid or housekeeper, and each security guard classified as an independent contractor annually.[15] Combined, these costs are staggering. More than 220,000 New Jersey residents work as construction laborers, maids/housekeepers, and security guards.[16] Moreover, there are tens of thousands of New Jerseyans working as independent contractors in low-paid trucking, delivery, housekeeping, janitorial, personal care, homecare, construction and agricultural occupations.[17]

2. **New Jersey's well-established "ABC test" law provides a strong bulwark against independent contractor misclassification, similar to other states that rely on it.**

New Jersey's "ABC test" law has been in effect since 1936.[18] The three-pronged analysis was developed as a way of determining coverage for unemployment insurance, with an intent to broaden coverage beyond traditional master-servant, or common law relationships.[19] By 1942, some 42 states had adopted and applied the analysis in some form,[20] and it is used in more twenty states today.[21] This means that agencies and businesses in those states know the law and understand what compliance looks like.

While the analysis is intentionally broad, it is not limitless: "the ABC test was created to identify a category of worker which was broader than the employee category traditionally carved out by the common law

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[13] *Report of Gov. Murphy's Task Force on Employee Misclassification* 6 (2019), https://www.nj.gov/labor/assets/PDFs/Misclassification%20Report%202019.pdf. *See also*, *Huge Costs*, NELP, *supra* n. 6 at 9, n. 45.

[14] EPI, *Misclassifying Workers*, supra n. 1 at Fig. B, New Jersey.

[15] *Id.*

[16] NELP analysis of 2023 American Community Survey data, available at https://data.census.gov/app/mdat/ACSPUMS1Y2023/table?cv=COW&rv=ucgid,SOCP&wt=PWGTP&g=AwFm-BVBlBmEg.

[17] NELP analysis of 2023 American Community Survey data, available at https://data.census.gov/app/mdat/ACSPUMS1Y2023/table?cv=COW&rv=ucgid,SOCP&wt=PWGTP&g=AwFm-BVBlBmEg.

[18] P.L. 1936, c. 270 sec. 19(i)(6).

[19] Syed M. Q. Ali Khan, *The Hiring Entity's Usual Course of Business*, 18 Hastings Bus. L.J. 109, 121-122 (2021), https://repository.uchastings.edu/hastings_business_law_journal/vol18/iss1/6.

[20] *Id.* at 121.

[21] *See* U.S. Dep't of Lab., Empl. And Training Admin., *Comparison of State Unemployment Laws* 1-4, 1-5 (2023) ("Employer-Employee Relationship" Coverage Table), https://oui.doleta.gov/unemploy/pdf/uilawcompar/2023/complete.pdf.

control test while not encompassing the entirety of those that fall within the independent contractor category of workers."[22] Notably, adoption of the "ABC test" by dozens of states did not lead to the demise of all independent contractors, nor eviscerate the freedom of individuals to form their own businesses and contract at arm's length to sell their goods or services. On the contrary, the analysis is now very well established, and many New Jersey businesses have been required to comply with it for decades.

Moreover, the New Jersey Supreme Court has protected against overly broad coverage, limiting interpretations of the statute that would be "practically impossible" to meet. *See*, *e.g.*, *Carpet Remnant Warehouse, Inc. v. New Jersey Dep't of Lab.*, 125 N.J. 567, 592-93 (1991) (holding that Prong B's "place of business" refers only to those locations where "the enterprise has a physical plant or conducts an integral part of its business"). Recognizing the Court's limitation, the rule amplifies that analysis in its examples.[23]

The "ABC test" does not outlaw independent contracting, but it does effectively limit the misclassification of employees and better ensure they have the rights and protections to which they are entitled. It establishes a presumption of employee status, reflecting the undeniable reality that most individuals who perform work for pay are working *for* a business, their employer; they are not running their own businesses. This presumption is efficient yet not insurmountable: the hiring entity or business is well positioned to supply the information needed to show that they are engaging a legitimate independent contractor. Indeed, New Jersey businesses have met this burden. *See*, *e.g.*, *Garden State Fireworks, Inc. v. New Jersey Dep't of Lab. & Workforce Dev.*, No. A-1581-15T2, 2017 WL 4320819, at *1 (N.J. Super. Ct. App. Div. Sept. 29, 2017) (finding that pyrotechnicians hired to conduct fireworks displays for a fireworks business were not employees); *Trauma Nurses, Inc. v. Bd. of Rev., New Jersey Dep't of Lab.*, 242 N.J. Super. 135 (App. Div. 1990) (finding that nurses were independent contractors not employees of nurse staffing company that supplied hospitals with temporary nurses).

In short, the "ABC test" has helped ensure that millions of workers both in New Jersey and elsewhere have access to bedrock employment and labor protections, that business compete on a level playing field, and that governments are not robbed of revenues that support social insurance programs. This rule will expand the understanding of the analysis in New Jersey, and claims that the sky is falling are simply without merit.

The Proposed Regulation is Consistent with State Supreme Court Precedent and Provides Helpful Clarity to Limit Harmful Misclassification of Employees.

Consistent with controlling case law and common sense, the rule presumes that a worker is an employee and would require a potential employer or hiring entity ("hiring entity") to prove each of the three prongs (A, B, and C) in order to exempt a worker from employment protections. *Hargrove v. Sleepy's, LLC*, 220 N.J. 289, 305 (2015); *E. Bay Drywall, LLC v. Dep't of Lab. & Workforce Dev.*, 251 N.J. 477, 495 (2022); *Carpet Remnant*, 125 N.J. at 581.

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[22] Ali Khan, *Usual Course*, *supra* n. 19 at 122.

[23] *See* 57 N.J.R. 894(a) (proposed 12:11-1.4(g) discussing Prong B and explaining that the showroom of a carpet sales business is a physical plant, and service of carpet installation as ancillary to, carpet sales business, therefore customer's home would be outside the place of business).

D. *The Rule Clarifies Each Prong of the Three-Part Analysis***.**

Relying heavily on and amplifying factors relied on by New Jersey courts, the rule provides meaningful clarity for each part of the ABC test. Importantly, the Department clarifies that listed factors are not to be confused with a checklist, and that additional relevant factors may be considered. As such, the determination of independent contractor status does not depend on a scoreboard for each factor. Rather, the question "is determined based on an evaluation of the facts surrounding the relationship between the [hiring entity and worker] and the application of the ABC test to those facts." 57 N.J.R. 894(a) (proposed 12:11-1.6).

I. Prong A

The Department's description and suggested factors elucidate the first element (Prong A) well, consistent with court interpretations and its expertise. The highlighted indicia of control are particularly clarifying. Considerations such as whether: the hiring entity "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 hiring entity; a worker must wear a uniform or "display a specific logo . . . or other insignia;" and the hiring entity determines the worker's pay each suggest significant control. In today's economy, corporations like Uber and Amazon purport to offer "flexibility" to workers that they insist are 'independent contractors' but then rely on hidden algorithms and electronic surveillance ("bossware") to control virtually every aspect of the work, including: who can work and when: whether they will be disciplined through termination or suspension ("deactivation"): to which customers they will provide services while displaying the corporate logo; and how much (or little) they will be paid—and workers lack the ability to increase prices when business expenses rise.

Amazon's take-it-or-leave it adhesion contracts detail requirements its Flex "delivery service partners" must adhere to at risk of losing work. In its Terms of Service agreements with Flex delivery app drivers, Amazon reserves the right to control drivers' vehicles and services during scheduled work hours, to set driver pay, and to terminate drivers.[24] The Amazon-designed Flex app is perpetually tracking and evaluating Flex driver location and performance data to determine their access to work and pay.[25] Indicia of control, whether exercised, hidden, or reserved must be analyzed.

This first element of the proposed rule would also appropriately consider control for the purpose of legal compliance as a factor. Control is relevant regardless of the reason for it, and control for legal compliance indicates power: if a government agency or other entity charges a hiring entity with ensuring legal or regulatory compliance, that hiring entity has, or should have, the requisite control and power to ensure such compliance. Thus, it is a factor that should be considered along with other indicia of actual or reserved control.[26]

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[24] *See* Maya Pinto, *Delivering Precarity: How Amazon Flex's Labor Model Harms Workers and What to do About It,* NAT'L EMPL. L. PROJECT 8 (July 2025), https://www.nelp.org/insights-research/delivering-precarity-how-amazon-flex-harms-workers-and-what-to-do-about-it/.

[25] *Id.* at 16.

[26] As a federal circuit court has recognized in a similar context, the inquiry looks to "the nature and degree of the alleged employer's control, not why the alleged employer exercised such control." *Scantland v. Jeffry Knight, Inc.*, 721 F.3d 1308, 1316 (11th Cir. 2013).

II. Prong B

The second element (Prong B) of the rule is consistent with the statute, enabling a hiring entity to satisfy this element by showing either of two things: the worker's service is outside the usual course of the hiring entity's business; or the worker's services are performed outside of all the places of business of the enterprise.

The rule explains that the "usual course of business" includes the tasks or activities a hiring entity regularly undertakes in order to provide its goods or services, or to generate revenue. 57 N.J.R. 894(a) (proposed 12:11-1.4). This element looks to the goods or services the hiring entity is known for, —i.e., what it markets to its customers or client community. The commonsense examples provided in the proposed rule make this point: a drywall company provides drywall installation, so the drywall workers perform work in the company's usual course of business. In contrast, a restaurant's usual course of business is serving food, such that if it hires a musician to perform on a given night, the music provided by the musician is likely outside of the restaurant's usual course of business.

Additionally, the rule also clarifies what constitutes a "place of business," which includes where the hiring entity conducts "an integral part of its business." As the Department explains, this includes only work that is an "essential component of, rather than ancillary to, the putative employer's business." *Id.* Again, the rule provides helpful examples and counter examples: the airplane of an airline business is place of business, but public buildings or libraries used by title abstractors are not.

Further, the recognition that customer homes *may* be "places of business" does not render the rule overbroad. The Department's suggestion that a worker who *installs* a carpet from a carpet *sales* company would not be working within the carpet sales company's business is drawn from and consistent with New Jersey's Supreme Court analysis. *See Carpet Remnant*, 125 N.J. 567. Likewise, the rule will not transform every remote worker's residence into a place of business, as the rule specifically suggests otherwise.

III. Prong C

The final element requires that the hiring entity show that it has engaged "an enterprise that exists and can continue to exist independent of, and apart from, the particular service relationship with the putative employer; that is, the enterprise must be stable and lasting and able to survive the termination of the relationship" with the hiring entity. 57 N.J.R. 894(a) (proposed 12:11-1.5).

This third element examines whether the worker has a genuine standalone business. Analyzing the viability of the worker's business *independent of* the hiring entity, including its customer base and volume, investments, and whether it sets prices, passes along costs of doing business or sets pay rates helps ensure that the analysis looks past form and into substance. The rule also helpfully establishes a number of guardrails, explaining that certain facts, standing alone, do not indicate an independent business including: working for multiple employers; having a professional license; having a sole proprietorship or LLC.; or having liability insurance.

Indeed, the Department's rule reflects an understanding of the power dynamics between hiring entities and individual workers. It appreciates that hiring entities often have power to manipulate certain factors by requiring them as a condition of work, and that workers may agree to contractual demands simply to

ensure some income to put food on the table or pay the rent. For instance, the rule recognizes that where a hiring entity suggests or encourages workers to obtain insurance, such insurance does not suggest the worker is an independent contractor. It also recognizes that a hiring entity cannot transform an employee into an independent contractor by choosing to report earnings using a Federal IRS Form 1099 instead of Federal Form w-2. Moreover, the rule requires any independent contractor "agreement" to be examined considering who drafted it, whether it was negotiated, whether the hiring entity can unilaterally modify it, and whether either party can terminate their relationship at any time during the term of the agreement.

The rule's approach to the third element (Prong C), as with the other elements, provides needed clarity and useful examples that will promote understanding and help ensure statutory compliance.

* * *

In sum, NELP fully **supports** the proposed rule as consistent with the statute and New Jersey Supreme Court interpretations, and as helpful in educating stakeholders and helping end independent contractor misclassification in today's economy. Thank you.

Sincerely,

/s/

Sally Dworak-Fisher
Senior Staff Attorney

From:	Wayne Brengel
To:	Fish, David [DOL]
Subject:	[EXTERNAL] NJ Workers Classification Rule N.J.A.C. 12:11
Date:	Tuesday, August 5, 2025 2:10:34 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png image007.png image008.png
Importance:	High

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Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11) Dear Mr. Fish, I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself. Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition. Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine. At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption. I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve. Thank you for the opportunity to comment.
Wayne Brengel PLCS
Producer
Otterstedt
Hackettstown NJ

Engelwood Cliffs

Wayne R. Brengel
Personal Lines
Coverage Specialist

313 High St
Hackettstown NJ 07840
908-869-9494

PLCS

wbrengel@otterstedt.com

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From: Abi Rivenburgh
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 2:10:46 PM

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Dear Mr. Fish,

As a 5th generation owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule.

Independent insurance producers—myself and my team included—have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing. This model benefits consumers, encourages competition, and allows small businesses like ours to serve our communities effectively.

The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers.

I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and their clients across New Jersey.

Thank you for considering my comment.

Abigail Stults Rivenburgh
Executive Vice President
Allen & Stults Co.
Hightstown, NJ 08520

From: Joseph Arite
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Letter re: N.J.A.C. 12:11 – Independent Insurance Agent Carve-Out
Date: Tuesday, August 5, 2025 2:18:21 PM
Attachments: Comments on Amendments to N.J.A.C. 12.11_GTL.pdf

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Dear Mr. Fish,

Attached is a comment letter from Guarantee Trust Life Insurance Company regarding the recent amendments to N.J.A.C. 12:11. We are requesting a carve-out for independent insurance agents based on their unique and long-standing role in the industry.

Please let me know if you have any questions or need anything further.

Sincerely,

Joseph Arite

Joseph Arite

Vice President, Government Relations
Guarantee Trust Life Insurance Co.
Email: jarite@gtlic.com
Direct: (847) 904-5306
Mobile: (419) 350-0279

GTL | GUARANTEE TRUST LIFE

1275 Milwaukee Ave, Glenview, IL 60025
www.gtlic.com

GTL | GUARANTEE TRUST LIFE

Guarantee Trust Life Insurance Company
1275 Milwaukee Avenue
Glenview, IL 60025
847-904-5306
Jarite@gtlic.com

August 5, 2025

Commissioner Robert Asaro-Angelo
New Jersey Department of Labor & Workforce Development
1 John Fitch Plaza
Trenton, NJ 08625

RE: Comment on Amendments to N.J.A.C. 12:11 – Request for Carve-Out for Independent Insurance Agents

Dear Commissioner Asaro-Angelo,

On behalf of Guarantee Trust Life Insurance Company (GTL), I appreciate the opportunity to comment on the recently promulgated amendments to N.J.A.C. 12:11, which codify the Department's interpretation of the ABC test for determining independent contractor status under New Jersey's Unemployment Compensation Law and Wage and Hour Law.

We respectfully request that the Department include a clear and specific carve-out for independent insurance agents in the final rule.

Independent insurance agents are not traditional employees. Rather, they are entrepreneurs who build and manage their own books of business, often representing multiple carriers to offer consumers a variety of insurance products which best meet their individual needs. These agents control their own schedules, marketing strategies, and business operations. Many even employ staff and operate out of their own offices.

This model is a longstanding and essential component of the insurance industry. It empowers agents to serve clients independently while providing insurance companies, like GTL, with the flexibility to distribute products efficiently and cost-effectively across diverse markets.

Applying the ABC test to independent insurance agents risks mischaracterizing their roles and disrupting a system which has worked effectively for decades. In particular:

- **Prong B** (requiring that the service be outside the usual course of the business) is particularly problematic. While agents do sell insurance—core to GTL's business—they do so independently and not under the direction or control of the carrier.
- **Prong C** (requiring the individual to be customarily engaged in an independently established trade) clearly applies to these agents. They are licensed professionals conducting business on their own terms, often with multiple carriers.

GTL | GUARANTEE TRUST LIFE

Because of the structure of the insurance marketplace, independent agents should not be evaluated under a framework designed for gig economy or platform-based labor arrangements. Their relationship with carriers is regulated by federal and state insurance laws which already establish clear professional standards and obligations.

Recognizing the unique role of insurance agents, some states have enacted specific carve-outs from general employment classification tests. For example, California exempts licensed insurance agents from its ABC test under AB 5 and AB 2257; and Louisiana has enacted legislation explicitly exempting licensed insurance professionals from its independent contractor rules. These states acknowledge the long-standing, independent nature of the agent-carrier relationship and the vital role agents play in insurance distribution. GTL urges New Jersey to adopt a similar approach to preserve the integrity of its insurance distribution system and prevent unnecessary disruption to independent agents and the consumers they serve.

Guarantee Trust Life Insurance Company supports strong worker protections and fair classification standards. However, we believe the application of the ABC test to independent insurance agents is misplaced and counterproductive. We respectfully urge the Department to revise the regulation to exempt licensed independent insurance agents from its scope.

Thank you for considering our comments. We are happy to provide further information or participate in any stakeholder discussions which may assist in refining this important rule.

Sincerely,
Joseph Arite
Vice President, Government Relations
Guarantee Trust Life Insurance Company

From:	Jack Blair
To:	Fish, David [DOL]
Subject:	[EXTERNAL] N.J.A.C.12:11 includes an exemption for insurance producers.
Date:	Tuesday, August 5, 2025 2:22:25 PM
Attachments:	image002.png image003.png image004.png image005.png image006.png

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Dear Mr. Fish,

As the owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule. Independent insurance producers—myself and my team included—have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing. This model benefits consumers, encourages competition, and allows small businesses like mine to serve our communities effectively.

The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers. We have already seen concern expressed by some of our carrier partners.

I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test so we can avoid any ambiguity. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and tens of thousands of their clients across New Jersey.

Thank you in advance for your favorable considerations.

Jack Blair, CPCU, CIC, AAI *Managing Partner*

Phone (609) 587-1600 ext. 115
Email jblair@nottins.com
Office 2277 NJ-33, Hamilton Square, NJ 08690
Website www.nottinghaminsurance.com

Follow Nottingham Insurance:

From: Gina Sullivan
To: Fish, David [DOL]
Subject: [EXTERNAL] ELEC825 IUOE825 Comments on ABC Test N.J.A.C. 12:11
Date: Tuesday, August 5, 2025 2:36:35 PM
Attachments: ELEC825 IUOE825 DOL COMMENTS ON ABC TEST RULE N.J.A.C. 1211.pdf

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Mr. Fish,

Attached please find a letter of support for DOL proposed rule change to the ABC Test at N.J.A.C. 12:11 submitted by Greg Lalevee, Business Manager of Operating Engineers Local 825 and Mark Longo, Director of ELEC825, the Labor Management Fund of Operating Engineers Local 825.

Please confirm receipt of these comments.

Thank You,

Gina Sullivan
Business Development
Engineers Labor-Employer Cooperative
The Labor Management Fund of IUOE 825
Office: 973-671-6754
Mobile: 732-766-4738

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ENGINEERS LABOR-EMPLOYER COOPERATIVE
The Labor-Management Fund of Operating Engineers Local 825
65 SPRINGFIELD AVENUE, 2ND FLOOR, SPRINGFIELD, NJ 07081
973-630-1010 • FAX 973-630-1013

August 4, 2025

VIA ELECTRONIC MAIL

David Fish
Executive Director, Legal and Regulatory Services
New Jersey Department of Labor and Workforce Development
PO Box 110 – 13th Floor
Trenton, NJ 08625-0110
David.fish@dol.nj.gov

RE: Proposed New Rules: N.J.A.C. 12:11 – ABC Test; Independent Contractors

Dear Mr. Fish,

The Engineers Labor-Employer Cooperative (ELEC) is a labor-management organization representing the combined interests of the 8,000 members of the Operating Engineers Local 825 and the signatory contractors who employ them throughout the entire State of New Jersey and five counties in New York's Hudson Valley.

Our members and contractors are responsible for billions of dollars in commercial, industrial, highway, utility, and institutional construction projects annually. We invest heavily in our two state-of-the-art training facilitates, apprenticeship and continuing education and credentialing so that our workforce is the best-trained, most highly skilled available providing efficiency and safety. That is why our organization continually advocates for legislation and regulations that seek to raise the standards of construction in New Jersey and protect our residents and taxpayers while encouraging capital projects to be built safely, responsibly, and efficiently.

ELEC 825 and IUOE 825 support the Department of Labor's efforts to formally adopt the ABC Test for independent contractor status at N.J.A.C. 12:11. This rule will help determine misclassification of construction workers as independent contractors and put an end to dishonest contractors that capitalize on loopholes to avoid paying prevailing wage and providing workers with fair pay and basic protections.

Misclassification is a serious issue facing the construction industry. When these deceitful contractors skirt around payroll taxes, workers compensation and unemployment insurance, and pay unfair wages to workers, these bad actors undercut the industry and impact taxpayers, workers, and law-abiding contractors.

The ABC test creates clear enforcement standards for the construction industry, making certain that workers are rightfully classified as employees when performing work under a business's control. Codifying the ABC Test will ensure all contractors are held to the same standards, and the most vulnerable workers are protected.

We thank the Department of Labor for taking this important step in addressing this long-standing issue for our industry and ensuring the hard-working trades men and women of this state are protected.

Thank you for the opportunity to submit these comments.

Sincerely,

Greg Lalevee
Business Manager
IUOE 825

Mark Longo
Director
ELEC825

From: Crowther, Leana
To: Fish, David [DOL]
Subject: [EXTERNAL] Independent Contractor Regulations Comments
Date: Tuesday, August 5, 2025 2:44:22 PM
Attachments: Sen.Burzichelli.NJ DOL Proposed Independent Contractor Regulations.pdf

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Good afternoon:

On behalf of Senator Burzichelli, please see the attached letter.

Thank you,

Leana Crowther, Chief of Staff
Office of Senator John J. Burzichelli
Third Legislative District
711 North Main Street
Glassboro, NJ 08028
856-226-3530

NEW JERSEY SENATE

JOHN BURZICHELLI
SENATOR, 3RD LEGISLATIVE DISTRICT
GLOUCESTER, SALEM & CUMBERLAND COUNTIES
PHONE: (856) 226-3530
FAX: (856) 243-2830
SenBurzichelli@njleg.org

GLOUCESTER COUNTY OFFICE
711 NORTH MAIN STREET
GLASSBORO, NJ 08028

SALEM COUNTY OFFICE
199 EAST BROADWAY
1ST FLOOR SUITE G
SALEM, NJ 08079

August 5, 2025

Robert Asaro-Angelo, Commissioner
New Jersey Department of Labor and Workforce Development
PO Box 110
Trenton, NJ 08625

Re: PRN 2025-051- ABC Test; Independent Contractors

I am writing today regarding the New Jersey Department of Labor's new regulations that implement redefinition of the employment status of independent contractors in our state.

While I do understand that intent of these proposed regulations is to provide protections and enhance the rights of employees, the "ABC Test" metric may indeed cause harm to independent contractors and independent business owners in multiple industries. The potential disruptions to business, and the impacts to consumers and clients that the rule change could impart would be detrimental.

My office has received feedback from numerous constituents and businesses in my legislative district who all have concerns regarding these new regulations.

I am respectfully requesting a deferment and a comprehensive analysis and review of this pending rule change before it is officially implemented to curtail any unintended consequences.

Sincerely,

John Burzichelli
Senator

From: Reggie Jackson
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 2:56:56 PM

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Dear Mr. Fish,

As the owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule.

Independent insurance producers—myself and my team included—have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing. This model benefits consumers, encourages competition, and allows small businesses like mine to serve our communities effectively.

The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers.

I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and their clients across New Jersey.

Thank you for considering my comment.

Michael Matlack
President
Matlack & Company
Glendora, NJ

From:	Janet Koss
To:	Fish, David [DOL]
Cc:	Jeff Beck
Subject:	[EXTERNAL] Comments on Proposed Revisions to ABC Test; PRN 2025-051
Date:	Tuesday, August 5, 2025 3:06:17 PM
Attachments:	image001.png image003.png SICA ABC Letter (08042025).pdf

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Dear Executive Director Fish:

On behalf of Jeff Beck, please see the attached letter re: Comments on Proposed Revisions to ABC test; PRN 2025-051.

Best regards,

Janet Koss
Senior Executive Assistant to Jeff Beck
Senior Vice President, Government & Regulatory Affairs
Selective Insurance Company of America
P: 973-948-1718
janet.koss@selective.com

Jeff Beck
Senior Vice President, Government and Regulatory Affairs
Selective Insurance Company of America
40 Wantage Avenue
Branchville, New Jersey 07890
Tel: (973) 948-1311
Fax: (973) 948-0282
E-mail: jeff.beck@selective.com

August 4, 2025

SENT VIA E-MAIL – david.fish@dol.nj.gov

David Fish, Executive Director
Legal and Regulatory Services, 13th Floor
Department of Labor and Workforce Development
PO Box 110
Trenton, NJ 08625-0110

RE: Comments on Proposed Revisions to ABC Test; PRN 2025-051

Dear Executive Director Fish:

We appreciate the opportunity to comment on the Department's proposal to substantially modify the "ABC Test," which is used to classify "independent contractors."

Selective Insurance Company of America ("Selective") has been headquartered in New Jersey for 99 years and is the servicing and lead carrier for ten property and casualty insurer affiliates. We employ over 800 people who work from our four New Jersey offices. Selective has also contracted with over 200 independent insurance agencies in New Jersey as the exclusive distributors of our products and services.

As members of the Insurance Council of New Jersey and the American Property Casualty Insurance Association, we concur with the comments opposing the proposed modifications to the ABC Test in their contemporaneous joint letter with the National Association of Mutual Insurance Companies.

We are focusing our comments on how the test and any classification of our independent agents as "employees" would substantially (1) interfere with negotiated contracts that confirm the independent agency's independent contractor status and autonomy, (2) disrupt contractual compensation arrangements, (3) create legal and regulatory contradictions, likely resulting in the need for insurers to file for rate relief, and (4) disrupt the flexibility and market solutions that the independent agency system provides. More detail on these points follows:

1. <u>The Test Will Interfere with Negotiated Contracts That Confirm the Agency's Independent Contractor Status</u>

Consistent with existing New Jersey laws and regulations, independent agency agreements are structured as service contracts – not employment contracts. These agreements define the agent as an independent contractor, preserving the agent's autonomy in operations, business decisions, and ability to represent multiple insurers. Reclassifying agents as employees would override these terms, violating:

- Freedom of Contract – Insurers and independent agents intentionally structure their relationship so the agents can operate their own businesses autonomously.

- Mutual expectations – Both insurers and independent agents agree to and rely on the agent's independent status for operational and legal flexibility.

Our standard independent insurance agency agreement gives the agency wide operational autonomy, providing in pertinent part:

> **SECTION 2**
> **YOUR AUTHORITY**
>
> A. Subject to all terms of this Agreement and its Schedule(s), Our underwriting guidelines, rating manual and Our specific instructions which We and which shall be maintained on our agent website and subject to requirements imposed by law, rules and regulations, Your authority to act on Our behalf is exclusively limited to:
>
> * * *
>
> 8. Exercising exclusive and independent control over Your time and the conduct of Your business.

Both parties to our standard independent insurance agency contract agree that the independent agent is an independent contractor:

> **SECTION 15**
> **MISCELLANEOUS**
>
> * * *
>
> J. We both agree that You are an independent contractor and not Our employee. Unless expressly provided herein to the contrary, Your acts, errors or omissions are not chargeable to Us and We expressly disclaim any liability for Your acts, errors or omissions.

2. The Test Will Disrupt Negotiated Commission-Based Compensation Structures

We compensate independent agents by commission, and any reclassification of their independent contractor status will frustrate:

- The negotiated payment mechanism, sales volume, profitability, and performance incentives to address market demands, and

- The tax payment and reporting obligations that independent insurance agencies already bear.

Our standard independent insurance agency agreement provides for commissions in pertinent part, as follows:

SECTION 4
COMMISSIONS

A. We agree to pay You commissions at the then effective rates and subject to the then effective conditions as set forth, from time to time, on Our agent website on Your written premiums (meaning gross written premiums plus policy or service fees actually received by Us less refunds and cancellation return premium amounts), subject to any offset to which We are entitled, and less any commissions returnable to Us on return premiums. We will not reduce Your commission rates for a particular line of business more than once in any twelve (12) month period. Notwithstanding the foregoing, all flood commissions shall be paid in accordance with applicable NFIP requirements and may be revised as and when revised by the NFIP.

3. The Test Would Create Legal and Regulatory Contradictions and Likely Require Insurers to File for Rate Increases

New Jersey insurance law recognizes the independent agent model. By classifying agents as employees, the Department would:

- Undermine compliance with producer appointment statutes that assume agency independence.
- Potentially void errors and omissions insurance policies covering independent insurance agencies by making agents insurer employees.
- Significantly increase employee expense, upending insurance accounting regulation, which has detailed requirements about expenses, profitability measures, and capital requirements.
- Because of the classification's impact on expenses, insurers will likely have to file for significant rate relief from the New Jersey Department of Banking and Insurance, increasing insurance expense for New Jersey consumers and businesses.

4. The Test Will Disrupt the Flexibility and Market Solutions the Independent Insurance Agency System Provides

Independent agents represent multiple insurance carriers, and our business model is based on the choices their independence provides. Their reclassification as employees would:

- Create conflicts of interest and limit consumer choice, as employees typically owe exclusive loyalty to one employer, and the former independent agent might be forced to align with one carrier and drop other insurers, lessening consumer choice and flexibility working with one agent and securing the awareness and advantages of the distinct products of multiple carriers.
- Invalidate existing contracts that allow agents to represent multiple insurers.

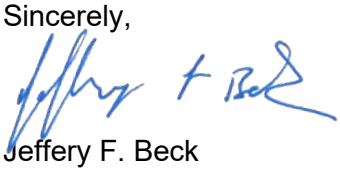
Conclusion

For these reasons and those outlined in the trade association joint letter, we respectfully request that the Department either (i) withdraw the current proposal and engage stakeholders to design a new rule more appropriately reflecting how the property casualty insurance industry operates or (ii) clarify that the ABC Test does not apply to independent insurance agents and financial professionals who work in the insurance industry.

Any action short of these will imperil an insurance distribution model, gravely impact insurance company regulation and expense, and disrupt how insurance has been sold since it was first regulated.

We appreciate your attention and would be happy to respond to any questions.

Sincerely,



Jeffery F. Beck
Senior Vice President, Government and Regulatory Affairs

From:	Chris Briamonte
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Concerns Regarding the NJDOL"s Proposed Rule on Independent Contractors
Date:	Tuesday, August 5, 2025 3:13:18 PM
Attachments:	image001.png DOL concerns Briamonte-DOL Commissioner.pdf

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David,

Hi David,

Please find attached my formal letter to Commissioner Asaro-Angelo regarding my concerns about the Department's proposed independent contractor rule change.

As a fellow Villanova grad, I hope you can relate to the entrepreneurial perspective I bring — and I'd truly appreciate your help in ensuring this makes it to the Commissioner's desk.

I also hope, after reviewing the letter, you might consider advocating for the financial services industry. As currently written, the proposed rule casts too wide a net and risks sweeping in professionals who clearly operate with independence and intent — not misclassification.

Thanks in advance for taking the time to review this, and for any support you can lend.

Go Cats!

Respectfully,

Chris Briamonte, CFP®
President

NovaWealth

1715 Route 35
Suite 103
Middletown, NJ 07748
732-320-9021

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NovaWealth
Chris Briamonte, CFP® PRESIDENT

1715 Route 35 North, Suite 103 Middletown, NJ 07748 P 732.320.9021 F 732.540.1558

July 21, 2025
Commissioner Robert Asaro-Angelo
NJ Department of Labor & Workforce Development
Sent via email: david.fish@dol.nj.gov

Re: Concerns Regarding the NJDOL's Proposed Rule on Independent Contractors

Dear Commissioner Asaro-Angelo,

As an independent financial advisor operating in New Jersey for over 25 years, I am writing to express my deep concern regarding the New Jersey Department of Labor's proposed regulation, **N.J.A.C. 12:11 – Worker Classification**. If the Department proceeds with this rule change as currently written, I believe a *Murphy's Law* scenario will unfold—where many things go wrong, harming employers, entrepreneurs, and the very New Jersey clients and communities they serve.

Who Are You Protecting?

Let me begin by acknowledging that certain employers and industries have indeed misclassified workers as independent contractors to avoid providing them the rights and protections of employee status. These practices result in worker harm and create an uneven playing field for responsible employers. I support reasonable and targeted efforts to address this issue.

However, the Department must also recognize that many industries are comprised of **true entrepreneurs** who willingly choose independence over the protections of employee status. These individuals are risk-takers, job creators, and essential contributors to our economy. The proposed rule risks sweeping these professionals into unintended classifications, forcing them into employment relationships that serve neither them nor their clients. I focus here on the financial services industry, where I have decades of firsthand experience.

Unintended Consequences

The financial services industry includes thousands of professionals who choose the independent model to preserve autonomy, foster creativity, and provide objective advice to clients. Many of us have built our own organizations—complete with offices, employees, and unique cultures that reflect our values and mission.

Securities are offered through World Investments, Inc. A full-service broker dealer and member FINRA / SIPC.
Investment advisory services offered through World Advisory Services, an SEC Registered Investment Advisor.

While we are independent, we must affiliate with Broker-Dealers or Registered Investment Advisers (RIAs) for compliance and continuing education—relationships that protect the clients we serve and uphold industry standards. Unfortunately, under the proposed **ABC test**, these necessary affiliations may cause us to fail the test and be misclassified as employees. The consequences would be far-reaching:

- **Loss of Jobs and Careers**: Broker-Dealers and RIAs will be reluctant to absorb the costs and liabilities of employing independent advisors. Many will sever ties with lower-production advisors, putting experienced professionals out of work.
- **Loss of Financial Advice for NJ Families**: With fewer advisors—especially those serving middle- and lower-income families—thousands of client accounts will be "orphaned." Remaining advisors will need to implement account minimums, shutting out the very individuals who most need professional financial guidance.
- **Office Closures and Local Economic Impact**: Independent advisors maintain office space, employ local staff, and contribute to their communities. Forced reclassification will shutter many small firms, leading to job losses, increased vacancies, and declining property values. The unique, value-driven cultures we've built will be lost, and many revenue-generating, job-creating entrepreneurs will be driven to relocate to more business-friendly states.

Preserving the Entrepreneurial Spirit

America has long championed the entrepreneurial spirit, and New Jersey has a proud tradition of innovation and independence—from Thomas Edison to Elizabeth Coleman White (where would our blueberry industry be without her?). That spirit remains a cornerstone of our economy.

The proposed rule, however, threatens to stifle that spirit by forcing many independent professionals into unwanted employment relationships. I respectfully **urge the Department to reconsider the scope of the ABC test** and to support reasonable carve-outs—starting with the financial services industry.

Thank you for your time and consideration.

Respectfully,
Chris Briamonte, CFP®
President, NovaWealth

From: Jack
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 3:15:36 PM
Attachments: image001.png

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Report Suspicious

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Jack Reiner

CEO
Warren G Reiner, Inc.
Springfield, NJ 07081

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384 Morris Ave | PO Box 538 | Springfield, NJ 07081
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From: Jonathan H. Lomurro, Esq.
To: Fish, David [DOL]
Cc: Jonathan H. Lomurro, Esq.; Cornelius Larkin
Subject: [EXTERNAL] Written Comments - Proposed New Rules: N.J.A.C. 12:11
Date: Tuesday, August 5, 2025 3:21:36 PM
Attachments: NJAJ Public Comment 8.5.25.pdf

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Please see the attached correspondence.

Sincerely,

Jonathan H. Lomurro, Esq.
President

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NEW JERSEY ASSOCIATION for JUSTICE Inc.
Formerly the Association of Trial Lawyers of America - New Jersey (ATLA-NJ)

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DIRECTOR OF GOVERNMENTAL RELATIONS EMERITUS
Deborah R. Bozarth

August 5, 2025

David Fish
New Jersey Department of Labor
and Workforce Development
1 John Fitch Way
Trenton, NJ 08611

Dear Director Fish:

The New Jersey Association of Justice respectfully submits this Comment on the proposed regulations regarding the misclassification of workers as Independent Contractors: N.J.A.C. 12:11 (57 N.J.R. 894(a), Issue 9, May 5, 2025). For the reasons set forth below our organization is strongly in favor of the proposed regulations.

NJAJ is a professional organization of over two thousand attorneys, paralegals, law students and other advocates who are dedicated to the protection of the legal rights of individuals and the preservation of the civil justice system. Many of NJAJ's members regularly advocate on behalf of employees' rights. Indeed, NJAJ has a separate employment law section focusing on the protection and preservation of the rights of New Jersey employees under New Jersey's comprehensive statutory scheme. Our members regularly lecture on these employment laws and issues involved in this case, and hold seminars educating both employees and other attorneys on these laws. NJAJ is also involved in proposing and commenting on legislation affecting the rights of New Jersey employees.

NJAJ believes that the proposed regulations provide welcome clarification on the application of each prong of the "ABC" Test. As practitioners representing working people, NJAJ would like to focus its comments on the most important issues that require these regulations and address common misconceptions that permeate the discussion on this critically important issue.

NEW JERSEY ASSOCIATION for JUSTICE

Reasons The ABC Test Proposed Regulations Are Necessary to Protect Working People

Broad coverage to protect the most workers: First and foremost, as the New Jersey Supreme Court noted in the seminal case of *Hargrove v. Sleepy's*, 289 N.J. 220 (2015) the ABC Test regulations are needed to provide the broadest coverage to workers. Without the protections of "employee" status under the New Jersey wage laws, the potential for worker exploitation is rampant. Legally designating a worker as an "employee" under the law is the only way to prevent worker exploitation.

Our organization has commonly seen workers in trucking, construction and other industries work back breaking hours without any overtime. This leads to a drive for ever-increasing profitability at the expense of the law, worker safety and the overall public. For example, truck drivers routinely work in excess of 60-70 hours per week. Companies put profits over safety by flagrantly disregarding U.S. Department of Transportation requirements that mandate certain hours off for truck drivers. Similarly, other non-exempt workers are subject to excessive hours. Governor Murphy's report on misclassification sets forth the heavy price misclassification bears on the economy. (See https://www.nj.gov/labor/assets/PDFs/Misclassification%20Report%202019.pdf).

In addition, companies often take wildly inappropriate deductions from the compensation of workers. For example, trucking companies deduct their own business expenses for truck usage, gasoline, insurance, and tolls from drivers' pay. As such, workers are promised high gross income only to be left with a pittance after the employers withhold deductions that are blatantly illegal under the New Jersey Wage Payment Law.

Economic Instability for Workers: Independent contractor misclassification in New Jersey deprives workers of stable income and benefits typically afforded to employees, such as minimum wage, overtime pay, and unemployment insurance. Misclassified workers, often in industries like construction, transportation, and gig economy platforms, are paid per task or project without guaranteed hours, leading to unpredictable earnings. This lack of financial stability can push workers into precarious living situations, making it difficult to afford basic necessities like housing, healthcare, and transportation in a state with a high cost of living.

The plague of misclassification is tragic because the positions that are misclassified were historic pathways to the middle class. For example, truck drivers were able to afford homes and send their children to college. It is simply impossible for misclassified workers to achieve these same goals.

The history of worker misclassification has a sordid history in the state of New Jersey. The practice began with organizes crime-controlled entities that undercut union truck drivers by the use of independent contractor drivers, which led to lower pay and flouting of worker protection laws. (*See* https://www.youtube.com/watch?v=Z3ulfkgdbOU).

Loss of Workplace Protections: When workers are misclassified as independent contractors, they lose critical workplace protections under New Jersey labor laws. Employees are entitled to safeguards like workers' compensation for job-related injuries, anti-discrimination protections, whistle-blowing protections and the right to organize or join a union. Misclassified workers, however, are excluded from these protections (or face higher hurdles to invoke the laws), leaving them vulnerable to unsafe working conditions, harassment, or retaliation without legal recourse, which disproportionately affects low-wage and marginalized workers.

Denial of Benefits: Misclassification strips workers of access to employer-provided benefits such

as health insurance, paid sick leave, and retirement plans. In New Jersey, where the cost of healthcare is among the highest in the nation, the absence of employer-sponsored health plans forces misclassified workers to purchase expensive private insurance or forgo coverage entirely. This lack of benefits exacerbates financial strain and contributes to health disparities, particularly for workers in physically demanding or high-risk jobs.

Tax Burdens and Financial Risks: Misclassified workers in New Jersey are responsible for paying both the employee and employer portions of payroll taxes, such as Social Security and Medicare, which significantly reduces their take-home pay. Additionally, they must navigate complex tax filings without the support of an employer's HR department, increasing the risk of errors and penalties. This financial burden can trap workers in a cycle of debt, especially when combined with the lack of paid time off or emergency savings.

Impact on Retirement Security: Without access to employer-sponsored retirement plans like 401(k)s or pensions, misclassified workers in New Jersey face long-term financial insecurity. They must independently fund retirement savings, which is challenging given the immediate financial pressures of self-employment taxes and inconsistent income. This lack of retirement support contributes to a growing wealth gap, as misclassified workers are less likely to accumulate sufficient savings for a secure retirement.

Barriers to Collective Bargaining: Misclassification undermines workers' ability to unionize or engage in collective bargaining, which is a protected right for employees under New Jersey law. Independent contractors are considered self-employed and thus excluded from forming unions or negotiating for better wages and conditions. This weakens the bargaining power of workers in industries like ridesharing or delivery, where misclassification is rampant, perpetuating low wages and poor working conditions.

Disproportionate Impact on Vulnerable Populations: Misclassification disproportionately harms low-income workers, immigrants, and people of color in New Jersey, who are overrepresented in industries with high rates of misclassification, such as construction, janitorial services, and gig work. These workers often face language barriers, limited legal knowledge, or fear of retaliation, making it harder to challenge misclassification. As a result, they are more likely to endure exploitation and remain trapped in low-wage, unstable jobs.

Strain on Public Resources: The misclassification of workers places a significant burden on New Jersey's public resources. When employers misclassify workers, employers avoid contributing to unemployment insurance, workers' compensation funds, and other social safety nets. This shifts the cost of supporting misclassified workers—such as through Medicaid or other public assistance programs—onto taxpayers. The New Jersey Department of Labor has estimated that misclassification costs the state millions annually in lost tax revenue and fund contributions.

Legal and Enforcement Challenges: While New Jersey has implemented strict laws to combat misclassification, such as the ABC test under the Unemployment Compensation Law, enforcement remains a challenge. Workers may be unaware of their rights or hesitant to report violations due to fear of job loss or deportation, particularly in industries with high immigrant labor. The state's efforts to crack down on misclassification through audits and penalties are ongoing, but limited resources and the complexity of gig economy arrangements hinder comprehensive enforcement.

Erosion of Worker Dignity and Agency: Beyond financial and legal consequences,

misclassification erodes the dignity and agency of workers in New Jersey. Being labeled an independent contractor often means workers have little control over their schedules, workloads, or job terms, despite being treated as "self-employed." Rather, these hard-working people are relegated to being part of a shadow company. This lack of autonomy, combined with the absence of protections and benefits, fosters a sense of disposability, undermining workers' sense of value and contributing to mental health challenges in an already high-pressure economic environment.

Rebuttal to Anti-Worker Arguments to The ABC Test

Anti-worker business interests often criticize laws aimed at preventing independent contractor misclassification, such as the ABC test, through easily rebuttable arguments. The following are common criticisms from businesses and rebuttals addressing these purported concerns.

Increased Costs for Businesses Business lobbyists claim that stricter misclassification laws raise operational costs by requiring them to classify workers as employees, leading to higher expenses for payroll taxes, benefits, and compliance. This, they argue, reduces profitability and stifles economic growth. **Rebuttal**: While reclassification may increase costs, misclassification unfairly shifts financial burdens onto workers, who lose access to benefits like health insurance and basic worker protection. Governor Murphy's misclassification study concluded that misclassification costs the state millions in unpaid taxes and contributions to unemployment and workers' compensation funds. By ensuring proper classification, businesses contribute to a fairer economy, reducing the strain on public resources like Food Stamps and Medicaid, which taxpayers otherwise subsidize. Many workers misclassified as independent contractors are working poor despite working extremely hard. Moreover, compliant businesses will not be disadvantaged by competitors who illegally cut costs through misclassification.

Loss of Flexibility for Workers and Businesses Business groups argue that independent contractor arrangements offer flexibility for both parties, allowing workers to set their own schedules and businesses to scale labor needs efficiently. Stricter laws, they claim, eliminate this flexibility, forcing rigid employee structures. **Rebuttal**: This is a complete red herring. Many independent contractors still work under exacting supervision. For example, truck drivers are tracked all day while making deliveries. They are evaluated on a daily basis by their employer and often by the employer's customers to whom they deliver. In short, the flexibility argument often masks exploitation, as most misclassified workers have little control over their schedules, rates, or job terms despite being labeled "independent." The ABC test regulations ensure workers receive protections like minimum wage and overtime, which do not inherently eliminate flexible work arrangements. Businesses can still offer part-time or flexible employee roles while complying with labor laws, ensuring workers have both flexibility and security. Studies show that gig workers often prefer employee status for stability when guaranteed fair wages. Anecdotally, many workers misclassified as independent contractors would prefer to be employees, rather than be subject to exploitation.

Harm to Small Businesses Lobbyists claiming to represent small businesses argue that compliance with misclassification laws is burdensome due to limited resources for legal and HR support, potentially forcing them to reduce hiring or close. **Rebuttal**: While small businesses face compliance challenges in many areas, misclassification is not a sustainable solution. Exploiting workers to cut costs undermines long-term economic health, as misclassified workers have less disposable income to spend in local economies. Additionally, proper classification fosters

employee loyalty and productivity, benefiting small businesses. New Jersey offers resources, such as the Department of Labor's guidance and workshops, to help small businesses navigate classification rules. Moreover, the ABC Test is easily applicable and can be applied by most business owners.

Stifling Innovation in the Gig Economy Businesses, especially in the gig economy, claim that laws like the ABC test stifle innovation by forcing platforms like Uber or DoorDash to reclassify workers, disrupting their business models and limiting job opportunities. **Rebuttal**: Innovation should not come at the expense of worker rights. Gig economy platforms often rely on misclassification to externalize costs, paying workers below minimum wage after expenses like vehicle maintenance. Gig workers often earn far less than New Jersey's minimum wage. These workers are taking gig jobs because many employers require this arrangement. Proper worker classification encourages innovation in sustainable business models that prioritize fair wages and benefits. Other industries comply with labor laws without collapsing, which demonstrates that gig companies can innovate while complying.

Administrative and Legal Complexity Businesses argue that laws like the ABC test are complex and ambiguous, leading to costly legal disputes and uncertainty about compliance. **Rebuttal**: The ABC test provides a clear, three-pronged framework: workers must be free from control, perform work outside the employer's usual business, and engage in an independent trade. This clarity helps businesses avoid unintentional violations. New Jersey's Department of Labor offers free resources, including online guides and consultations, to clarify compliance. Legal disputes often arise from businesses willfully misclassifying workers to cut costs, not from law ambiguity. Strengthening enforcement and education, rather than weakening laws, addresses this concern while protecting workers.

Reduced Job Opportunities Businesses threaten that stricter laws will force them to reduce hiring or move operations out of New Jersey, limiting job opportunities for workers. **Rebuttal**: Misclassification creates a race to the bottom, where businesses compete by cutting worker protections, not by creating quality jobs. Proper classification ensures jobs come with fair wages and benefits, attracting more workers and reducing turnover. It is indisputable that states with the strongest economies (such as California, Massachusetts and Illinois) have the strongest worker protection laws-including the ABC Test.

These rebuttals highlight that New Jersey's misclassification laws prioritize workers' rights and economic fairness without undermining legitimate business needs. By addressing enforcement gaps and providing compliance support, New Jersey can balance business concerns with the urgent need to protect vulnerable workers.

In conclusion, for the reasons set forth above, NJAJ strongly supports the proposed regulations that will help clarify the rights of working people and the obligations of employers in the State of New Jersey. Please do not hesitate to contact me if you require any further information. Your courtesies are greatly appreciated.

Respectfully Submitted,

Jonathan H. Lomurro, Esq.
President

From: Evan Reiner
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 3:22:50 PM
Attachments: image001.png

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Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Evan Reiner

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evan@reinerinsurance.com | **http://www.reinerinsurance.com**

From: Nancy Difazio
To: Fish, David [DOL]
Subject: [EXTERNAL] Please DO NOT enact NJAC 12:11
Date: Tuesday, August 5, 2025 3:26:03 PM

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As a concerned New Jersey resident who cares about our state's workers and businesses, I urge you not to enact the new rules proposed by the Department of Labor, N.J.A.C. 12:11 or the updated ABC test.

This new set of rules will make it much more difficult for people to work as independent contractors. This means gig workers like freelancers, doctors or nurses working locum tenens (temporary assignments), journalists possibly even catering waiters and bartenders might have to become full time employees instead.

While that sounds good for benefits like sick days, it could hurt many people who love the freedom of choosing their own hours and jobs. Employees who can't afford to pay benefits will even eliminate jobs completely. If citizens of NJ make their living in one of these situations and it's suddenly illegal would they even be able to collect unemployment benefits until they were able to find different work?

Many people in New Jersey pick gig work because they can fit it around family, school, or even a second job due to the high cost of living in New Jersey. Stay-at-home moms might lose the chance to earn extra money while caring for kids at home. Students could struggle to fit classes in with rigid work schedules. Freelance journalists and writers might see fewer jobs, as companies cut back on flexible hires. Others who need maximum flexibility, like caregivers or part-time workers, would face limits on how and when they work. Also the new part C would make it difficult to start a new business, because it would be immediately necessary to have multiple clients or customers.

California's similar law, AB5, was an example of unintended negative consequences where many freelance jobs disappeared. Small businesses would face more paperwork and checks, making it tougher to hire help. Plus, surveys show most gig workers want to stay independent —they don't want to be forced into set schedules. Lawmakers should stop this proposal before it hurts our economy. Let's keep New Jersey a place where people can work flexibly and businesses can grow.

Please say no to these updated ABC test rules.

Sincerely,
Nancy Difazio
Skillman, NJ

From: Andy
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 3:29:01 PM

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Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

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Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Andrew D'Andrea
Andrew D'Andrea, CIC
Warren G Reiner Inc
384 Morris Avenue, PO Box 538, Springfield, NJ 07801
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website: www.reinerinsurance.com
Office Hours: M-Thu, 8:00am-4pm, Fri 7:30am-3:30pm
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commercialcustomerservice@reinerinsurance.com
Insurance Certificate requests: certificates@reinerinsurance.com

From: Jerry Ford
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 3:33:52 PM

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Thank you for the opportunity to comment.

Jerry Ford
Vice-President, Commercial Lines
Allen & Stults Co., Inc.
PO Box 110
Hightstown, NJ 08520

From: Lou
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 3:36:39 PM
Attachments: image001.png

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Thank you for the opportunity to comment.

Best Regards,

Lou

Louis B. Schlueter, CIC
Account Executive
Warren G. Reiner Inc.
39 Main St.
Clinton, NJ 08809
973-376-6810 x118
908-238-1750

From: Gruber, Zoe
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment letter in opposition to proposed new rule N.J.A.C. 12:11
Date: Tuesday, August 5, 2025 3:42:26 PM
Attachments: NJ.IC.commentltr.082025 executed.docx

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Thank you for the opportunity to respond. Our comment letter is attached.

Zoe Gruber
Assistant Vice-President, Head of Government Affairs

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O: 785.438.3035 | **C:** 785.969.8889
E: zoe.gruber@securitybenefit.com

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SecurityBenefit.com

August 5, 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:

Security Benefit Life Insurance Company (SBLIC) appreciates the opportunity to provide comments in response to the New Jersey Department of Labor and Workforce Development's (Department) proposed new N.J.A.C. 12:11 (the Proposal), which would interpret, through regulations, the statutory and common law "ABC test" regarding the question of independent contractor status under various New Jersey statutes. SBLIC is aligned with our trade associations, including the American Council of Life Insurers and the Insured Retirement Institute, that the continued classification of insurance producers and independent financial advisors as independent contractors is clearly supported by current New Jersey statutes and regulations.

SBLIC is a leader in the U.S. retirement market with over $55 billion in assets under management as of December 31, 2024. As of July 2025, almost 1,400 of our appointed insurance producers and/or financial professionals reside in New Jersey, with an additionally approximately 8,500 appointed in New Jersey as non-resident producers. If enacted, the adverse impact of the Proposal to SBLIC alone could affect close to 10,000 insurance producers and/or financial professionals.

As set forth below, SBLIC believes the Proposal as written would result in significant confusion and disruption to insurance producers and financial professionals in New Jersey, and possibly in surrounding states, should their long-standing status as independent contractors be changed. Moreover, the Proposal could result in the reduction of choice in insurance products to New Jersey consumers, and we urge the Department to withdraw the Proposal in its entirety.

Significant Disruption to Consumers and Producers

In the current landscape, many, if not most, independent insurance producers/financial professionals appointed with life insurance companies sell products for 10, 20, or more different companies. And importantly and to the benefit of the consumers with whom they interact, many also sell multiple lines of insurance products. For example, a particular producer may sell annuities, life insurance and auto insurance. Some producers also offer other financial services such as tax planning and tax return

preparation, Medicaid planning, and/or investment advisory services, etc. To require each individual life insurance company to consider as its employee an individual producer who is not only appointed to multiple insurers but also sells multiple lines of insurance and provides innumerable benefits to consumers, is simply unrealistic. Each individual life insurer would be incapable of exercising employer-type supervision over the multiple individual producers appointed to sell its products. It is simply impracticable and unrealistic for insurers to supervise as an "employee," an individual producer's business activities beyond the sale of an individual company's specific products.

Further, it is extremely unlikely that life insurance companies would even be able to convert all appointed producers and financial professionals from independent contractors to employees should the Proposal be enacted as written. The costs alone associated with such a widespread change would preclude upending the current model, to the detriment of consumers who would be left without the choice of products provided by independent producers with whom many consumers have a long-term, close, personal relationship, and would further result in New Jersey becoming an outlier in this practice.

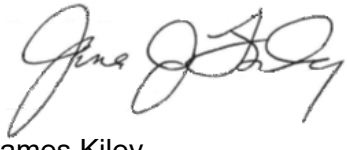
Furthermore, independent producers overwhelmingly enjoy the independence of having their own business – they like being their own boss, working the hours of their choosing, and for those that own their firms, being able to employ the staff they select to represent their business. Under the Proposal, independent producers would no longer be "independent" and instead, would be "employees" of multiple companies with whom they are appointed. The same shift in supervisory obligations noted above for insurers would be unmanageable for these independent producers as well.

Independent Representation is Good for New Jersey consumers

Licensed insurance agents and independently licensed producers and financial professionals are vital to continuing to ensure that thousands of New Jersey residents have access to important financial protection benefits. Not only is independent affiliation and representation across multiple carriers good for consumers and residents in New Jersey, the regulatory provisions for supervision and oversight, shared between producers and carriers under current New Jersey laws and regulations, ensure the continuation of the unique nature of this relationship. The services of an insurer (designing, developing and supporting insurance and financial products) are distinct from the services of an insurance producer or financial professional (prospecting for clients and selling suitable insurance and other financial products). Without continued recognition of the unique nature of the industry, the Proposal's interpretation would effectively dismantle an entire category of independent producers, precluding use of the long-standing independent contractor models used by insurers and agents in New Jersey for nearly 100 years.

Security Benefit Life Insurance Company appreciates the opportunity to comment and respectfully requests that the Department withdraw the Proposal in its entirety.

Sincerely,



James Kiley
SVP, Head of Education Market and Affiliate Relations

Zoe Gruber
AVP, Head of Government Affairs

From:	Kim Kavin
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Public Comment, Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors PRN 2025-052
Date:	Tuesday, August 5, 2025 3:45:56 PM
Attachments:	NJDOL-public-comment-FINAL.pdf

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Report Suspicious

Dear Mr. Fish,

Attached, please find the written public comment of Fight For Freelancers with regard to Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors PRN 2025-052.

Please reply to acknowledge receipt by the New Jersey Department of Labor & Workforce Development ahead of the August 6 deadline.

Thank you,

Kim Kavin
(908) 975-3031 (East Coast USA)
www.kimkavin.com
www.fightforfrfeelancersusa.com

August 5, 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
Email: david.fish@dol.nj.gov

Re: Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors
PRN 2025-052

Dear Director Fish:

Fight For Freelancers is a nonpartisan, grassroots coalition founded in New Jersey in 2019. The coalition's advocacy work centers on protecting independent contractors from policymaking that threatens self-employment at the state and federal levels nationwide.

Leaders and members of Fight For Freelancers, from the start, have expressed the strong need for independent contractors to have a meaningful voice in independent-contractor policymaking. I am one of the group's co-founders, Kim Kavin. I testified about independent-contractor policy in December 2019 before the New Jersey Legislature; in April 2023 and May 2025 before the U.S. House of Representatives; and in July 2025 before the U.S. Senate. I have been the lead author on detailed public comments that our coalition has submitted at the federal and state levels. I've been the lead author on amicus briefs filed with the U.S. Supreme Court and National Labor Relations Board with help from pro bono

attorneys at Littler Mendelson, P.C. I'm among the four co-founders of Fight For Freelancers USA who are plaintiffs in a lawsuit against the U.S. Department of Labor with help from pro bono attorneys at Pacific Legal Foundation. I'm also among the freelancers who regularly appear in the media.

On behalf of our coast-to-coast coalition of thousands of members—who have voted for everyone from Bernie Sanders to Donald Trump—I am writing to state strong opposition to Proposed New Rules: N.J.A.C. 12:11. Fight For Freelancers urges the Department to rescind this proposal immediately and in its entirety.

Prior Experience with Similar Policymaking

As I testified at the Department's public hearing on June 23, 2025, this proposal—and the task force report being used to justify it—stem from deeply misguided thinking that's doing irreparable harm in California. I detail below the flawed and faulty assumptions upon which this proposal appears to be based; indeed, in some instances, it appears that this information has been purposely mischaracterized to support a results-driven outcome.

The damage being endured in California led a bipartisan majority of Democrats and Republicans in Congress to reject this type of policymaking during the Biden and Trump administrations alike. The current Congress is moving now to pass legislation that would block this kind of ABC Test policymaking at the federal level before it can hurt anyone else. In addition, the newly staffed U.S. Labor Department has stopped enforcing that agency's most recently imposed independent-contractor rule.

What's continuing to happen in California today—and the reason so many federal lawmakers and regulators are working urgently to prevent such policymaking from spreading nationwide—is exactly what independent contractors from New Jersey warned when we testified en masse against this kind of regulatory language before the Legislature in Trenton six years ago. Lest anyone forget what happened at the State House in 2019, here is how the New Jersey Chamber of Commerce described it:

> How do you know when a piece of legislation misses the point? When the people affected by the legislation turn out in droves to warn the state Legislature of the unintended consequences of the bill — in this case, that it would threaten their careers. This is exactly what happened last week at a hearing in Trenton regarding a bill (S4204) that would define when workers would be designated as independent contractors, as opposed to company employees. … The strong backlash to this legislation surprised many, leaving observers to ask: *Who is this bill helping? What problem is it trying to solve? …* At last week's hearing — which was the second one

for this bill — the discussion of the unintended consequences used up about four hours of a six-hour hearing intended to examine 10 proposed pieces of legislation.[1]

New Jersey's legislators listened to independent contractors back then about the harm this type of policymaking causes, and wisely rejected it. Several of New Jersey's top legislators are speaking out now as well, on a bipartisan basis. On June 4, 2025, New Jersey Senators Gordon Johnson, chairman of the Labor Committee; Andrew Zwicker, chairman of the Legislative Oversight Committee; and Joe Lagana, chairman of the Commerce Committee—all Democrats—sent the Department a letter (reprinted in full below) stating that the Department's proposal may have "substantial negative impact" on properly classified independent business owners. Senator Joe Cryan, chairman of the Higher Education Committee and also a Democrat, had a representative read his concerns at the Department's public hearing. Former state Assemblyman Jack Ciattarelli, the current Republican nominee for governor, has promised to repeal the Department's rule if it goes through.[2] State Senator Jon Bramnick, also a Republican, called NJ101.5 radio on July 9, 2025, to add his voice to the nearly two full hours of callers who opposed the proposal on-air that day. Additional lawmakers have also spoken out (additional details below).

The Department should listen to these well-founded concerns and withdraw its proposal. In the years since California implemented its policy that attorneys say was *less stringent* than what the Department is currently proposing for New Jersey:

- Governor Gavin Newsom's former deputy chief of staff said: "It's truly horrific how many people are negatively impacted by it."[3]
- The Trump administration's Deputy U.S. Labor Secretary called it "catastrophic."[4]
- Members of the California Advisory Committee to the U.S. Commission on Civil Rights warned that it "disproportionately and negatively affects women, immigrants, people of color, and the politically powerless."[5]
- A California Assemblyman called on the U.S. Department of Justice to investigate.[6]

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[1] Tom Bracken, "Independent contractors bill' doesn't work — and independent contractors know it," New Jersey Chamber of Commerce, December 11, 2019
[2] @jack4nj on X, May 1, 2025
[3] Yashar Ali, @yashar on X, January 6, 2020, "Parts of California's AB 5 make it one of the most destructive pieces of legislation in the past 20 years. It's truly horrific how many people are negatively impacted by it."
[4] U.S. Deputy Secretary of Labor Keith Sonderling, "America must lead on the gig economy — or others will set the rules," *Washington Examiner*, June 10, 2025
[5] Members of the California Advisory Committee to the U.S. Commission on Civil Rights, "The Impact of California's AB5 on on Marginalized Communities: Examining the Evidence and Recommendations for Further Study," December 2024
[6] California Assemblyman Tri Ta, "Vietnamese women are the victims of unjust, discriminatory labor laws in California," *Orange County Register,* June 13, 2025

In January 2024, economists with the Mercatus Center at George Mason University published an analysis showing that California's law caused self-employment to decrease by 10.5% on average for affected occupations, and overall employment to decrease by 4.4% on average for affected occupations relative to control states.[7] As one of those economists, Liya Palagashvili, testified before Congress in May 2025, the type of ABC Test policymaking in the Department's proposed rule:

> aim[s] to reclassify independent contractors as employees. Empirical evidence shows that this approach ultimately reduces work opportunities for both self-employed individuals and traditional W-2 workers.

Palagashvili and her colleagues, in their 2024 analysis, cited "affected occupations" because, in California, the Legislature ultimately granted partial or full exemptions to more than 100 professions following public outcry and leading up to a ballot measure where a majority of voters exempted app-based rideshare and delivery drivers, too.

The Department's proposal includes no such exemptions for any professions, which means the damage in New Jersey would be far more widespread. This proposal is not crafted in a way that aims to help misclassified employees; it in fact targets all independent contractors, including the highly successful freelancers who out-earn their full-time W-2 counterparts. An April 2025 report from Upwork described such independent contractors, who earn exclusively through freelance work, as reporting "a median income of $85,000, surpassing their full-time employee counterparts at $80,000."[8]

The Department is threatening the livelihoods and careers of what the American Action Forum estimates as 1.7 million New Jerseyans who earn some or all of their income as independent contractors,[9] and the Department's own proposal states that it will not create any new jobs for those people after their incomes are lost.

To be clear: The Department should not add exemptions to its proposed rule. It should withdraw the proposal in full. California's method of playing favorites with exemptions for some professions, but not for others, is now facing allegations of discrimination based on gender and ethnicity in federal court.[10] As California Assemblyman

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[7] Liya Palagashvili, Paola Suarez, Christopher M. Kaiser and Vitor Melo, "Assessing the Impact of Worker Reclassification: Employment Outcomes Post–California AB5," Mercatus Center, George Mason University, January 31, 2024

[8] Gabby Burlacu and Kelly Monahan, "The Future Workforce Index: Evolving Talent Trends in 2025 and Beyond," Upwork, April 23, 2025

[9] Isabella Hindley, "State Level Costs of the PRO Act—Update," American Action Forum, May 10, 2023

[10] Suhauna Hussein, "Vietnamese American salon owners sue California alleging labor code is discriminatory," *Los Angeles Times*, June 2, 2025

Tri Ta recently wrote to U.S. Attorney General Pam Bondi: "Ensuring equal treatment under the law is a fundamental principle of our democracy."[11]

Further to that point, we draw your attention to what members of the California Advisory Committee to the U.S. Commission on Civil Rights wrote in their December 2024 report about how the exemption process played out in California with its ABC Test policymaking, known as Assembly Bill 5 (AB5):

> The evidence of the influence of the powerful union lobby on the seismic change in the classification paradigm is clear in the exemption process. The California legislature essentially outsourced the decision-making process for obtaining an exemption from AB5. The result was the politically powerful and those in industries not historical targets of organized labor were more readily able to obtain an exemption.[12]

There is overwhelming evidence in New Jersey that the union lobby is attempting to exert undue influence on the Department's rulemaking with regard to independent contractors here in the Garden State, as well. At the June 23, 2025, public hearing in Trenton, witness testimony was 3-to-1 against the Department's proposal. The only witnesses who testified in favor of this proposal at the public hearing were either employed by unions, or affiliated with organizations that have strong union ties:

- Eric Richard, legislative director for the New Jersey AFL-CIO
- Michael Broderick, president of Teamsters Local 469 and general executive board member of Joint Council 73 for the Teamsters
- Bernie Corrigan, president of the International Brotherhood of Electrical Workers Local 102
- Abby Adams, government affairs director for the Associated Construction Contractors of New Jersey, which represents and promotes the interests of the union construction industry
- Debbie White, president of Health Professionals and Allied Employees, the largest health-care union in New Jersey
- Jennifer Mancuso of the New Jersey Laborers Union, or LIUNA

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[11] David N. Young, "Assembly member Tri Ta calls for federal investigation to alleviate discrimatory practices," *Event-News Enterprise*, March 13, 2025

[12] Members of the California Advisory Committee to the U.S. Commission on Civil Rights, "The Impact of California's AB5 on on Marginalized Communities: Examining the Evidence and Recommendations for Further Study," December 2024

- Brandon Fishbaum of Carpenter Contractor Trust, which supports union contractors
- Paul Prendergast with the Eastern Atlantic States Regional Council of Carpenters, a council of the United Brotherhood of Carpenters and Joiners of America union
- Alan Schorr of the National Employment Lawyers Association, whose Washington, D.C. office address is c/o AFL-CIO 815 Black Lives Matter Plaza NW
- Joseph Niver of Make the Road New Jersey, whose staff is organized with the United Auto Workers Union 2320[13]
- Maya Pinto of the National Employment Law Project, a union-backed think tank,[14] who previously worked at the Service Employees International Union[15]
- Jake Barnes of the Workplace Justice Lab at Rutgers University, whose stated mission on its homepage includes support for unions[16]

Mancuso, of the New Jersey Laborers Union, introduced a Spanish-speaking worker and his English-speaking translator, who sat directly next to her as a suggestion that the worker also supported the proposed rule. However, per the translator, this worker did not express support for the Department's proposal. Instead, the worker testified: "The DOL is investigating my workplace for numerous violations, including misclassification."

In other words, his testimony made clear that the Department's proposed rule is unnecessary in order to address suspected cases of employee misclassification like his.

Fight For Freelancers also urges careful scrutiny of the testimony given at the public hearing by Mr. Richard of the AFL-CIO; Mr. Broderick of the Teamsters union; Mr. Barnes of the Workplace Justice Lab at Rutgers University; Ms. White of Health Professionals and Allied Employees; Mr. Schorr of the National Employment Lawyers Association; and Ms. Pinto of the National Employment Law Project.

Specific concerns about each individual's testimony are detailed below.

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[13] @mrnjunion bio description on X
[14] InfluenceWatch, retrieved July 6, 2025
[15] Maya Pinto biography, National Employment Law Project, available at https://www.nelp.org/person/maya-pinto/
[16] https://smlr.rutgers.edu/workplace-justice-lab-ru

Eric Richard Testimony

Mr. Richard of the AFL-CIO testified that: "The loss of tax-lock [sic] dollars to the state due to misclassification is staggering. We refer you to the initial task force report that outlines these numbers."

The 2019 Report of Governor Murphy's Task Force on Employee Misclassification (hereinafter, the "Task Force Report") does, indeed, claim that the state lost significant tax revenue based on what the report describes as a "2000 U.S. Department of Labor study of misclassification in construction in New Jersey." But the Task Force Report's own footnote for the tax-loss claim does not cite any U.S. Department of Labor study. It instead cites a 2016 report by Stockton University's William J. Hughes Center for Public Policy.[17]

Far from being a U.S. Department of Labor study, the Stockton University report's executive summary states that: "The William J. Hughes Center for Public Policy was contracted to study the underground commercial construction economy in the state of New Jersey for the Bricklayers and Allied Craftworkers Labor Management Committee of New Jersey, the Carpenter Contractor Trust, Associated Construction Contractors of New Jersey and Masonry Contractors of New Jersey."

Furthermore, there is a 2000 U.S. Department of Labor study about misclassification. It is colloquially known as the "Planmatics study," and its research was conducted in the 1990s,[18] about a decade before the iPhone was invented and laptop computers overtook desktops, freeing people to work from anywhere and for whomever they choose.

This antiquated Planmatics study's 196 pages include only two pages about New Jersey's construction industry. The three sources of information for those two pages in the Planmatics study are an unnamed person from the AFL-CIO; the head of a trade association who offers no data, statistics or research, but instead states that a company "not paying what they are supposed to pay has an unfair advantage"; and a 1999 *Star-Ledger* article that says New Jersey stopped misclassification in the construction industry back then by allowing tax auditors to work from the 20-factor test, which was a nickname for the IRS Test used to determine independent contractor status at that time.[19]

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[17] Oliver Cooke, Deborah Figart and John Froonjian, "The Underground Construction Economy in New Jersey," William J. Hughes Center for Public Policy, Stockton University, June 2016

[18] Planmatics, Inc. for the U.S. Department of Labor, "Independent Contractors: Prevalence and Implications for Unemployment Insurance Programs," February 2000

[19] Dan Weissman, "Builder caught in state tax crackdown," *Star-Ledger*, February 18, 1999

Michael Broderick Testimony

Mr. Broderick testified that: "According to the conservative estimate by the U.S. Department of Labor, approximately 1.8 million workers were found to have been misclassified by their employers in New Jersey."

The U.S. Department of Labor's Planmatics study states, on page F-7, that the number of workers misclassified statewide in New Jersey was 322,435. This same figure is noted on page 65 of the June 2016 report from Stockton University that the 2019 Task Force Report cites as a source.

Mr. Broderick's 1.8 million-worker claim would equate to 41% of New Jersey's current workforce of 4.4 million people[20] being misclassified. Not even the Task Force Report alleges that such a high percentage of misclassified workers exists in New Jersey.

Jake Barnes Testimony

Mr. Barnes of the Workplace Justice Lab at Rutgers University testified that: "A 2018 Berkeley Labor Center study estimated that between 12.4 and 20.5% of New Jersey's construction workforce was either misclassified as contractors or paid off the books."

This data, per a footnote in a 2022 Berkeley Labor Center report,[21] in fact comes from a 2020 study supported by the United Brotherhood of Carpenters and Joiners of America, one of North America's largest building trades unions.[22]

Debbie White Testimony

Ms. White testified that: "While unions like ours are winning contracts with better wages, hours and working conditions like staffing ratios, and thereby bringing standards up even in non-union facilities, AI platforms provide a race to the bottom by rewarding the lowest-wage bids with no benefits. Gig nursing also destabilizes a workforce by relying on cheaper labor instead of hiring and retaining more staff."

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[20] Press release, "New Jersey Exceeded 4.4 Million Jobs in February Setting New Record High," New Jersey Department of Labor & Workforce Development, March 27, 2025

[21] Ken Jacobs, Kuochih Huang, Jenifer MacGillvary and Enrique Lopezlira, "The Public Cost of Low-Wage Jobs in the New Jersey Construction Industry," UC Berkeley Labor Center, March 24, 2022

[22] Russel Ormiston, Dale Belman and Mark Erlich, "An Empirical Methodology to Estimate the Incidence and Costs of Payroll Fraud in the Construction Industry," January 2020

Ms. White's union represents the nurses at University Hospital in Newark.[23] According to the contract that her union negotiated for use from October 1, 2021, through September 30, 2024, there was no problem with temporary nurses being hired at the hospital for up to 12 months at a time.

And the temporary nurses had no impact on existing nursing staff; the contract states that "regular full and part time nurses from a specific work unit or department shall not be laid off unless casual and temporary nurses' positions are first eliminated."

In addition, it was the union contract—which bears Ms. White's personal signature—that ensured those temporary nurses only received reduced benefits or no benefits.[24] Screen shots from the contract are below:

4.05 Temporary and Casual Nurses

1. Temporary Nurse
   Temporary nurses are hired for a specified period of time not to exceed twelve (12) months in the same position. If the position is filled by a temporary employee beyond the twelve (12) months, the position shall be posted for bidding or closed.

2. Casual Nurses
   Casual nurses are hired to work on average less than twenty (20) hours per week within ninety (90) calendar days.

3. Health benefits
   Casual and Temporary nurses are not eligible for any benefits except those required by law.

4. Benefit Time

   Casual and Temporary Part Time nurses shall not be eligible for any time off benefit, except as required by law.

   Temporary full time nurses shall be eligible for holiday, vacation and sick time pay upon completion of six (6) months of continuous employment.

5. Sick Time
   Casual and Temporary Part Time nurses shall not eligible for sick time except as required by law.

[23] Dana DiFilippo, "Nurses at Newark's University Hospital approve contract, dodging strike" *New Jersey Monitor*, October 12, 2024

[24] This contract is available for review at https://www.uhnj.org/wp-content/uploads/2023/07/HPAE-5089-UH-CNA-2021-2024-signed.pdf

6. Uniform Allowance

Casual and Temporary nurses shall not be eligible for Uniform Allowance.

7. Tuition Reimbursement

Casual and Temporary nurses are not eligible for tuition reimbursement.

In terms of financial compensation, the union contract's highest listed annual salary appears to be $180,956, for advanced practice nurses. By comparison, according to a January 2025 report by the health-care staffing platform Nursa, from 2019 to 2023, pay rates for contract nurses doubled compared to pre-pandemic levels. Prolucent Health reported a 67% increase in the advertised pay rate for travel nurses from January 2020 to January 2022. In some areas, pay rates for travel nurses surpassed $240 per hour.[25]

In March 2024, the health-care staffing agency AceStack reported that from 2020 to 2022, there were bidding wars for travel nurses, with "astronomical pay rates routinely exceeding $5,000 to $6,000 per week." More recently, according to AceStack: "the average weekly gross pay for travel nurse assignments in early 2024 is around $2,800 for a 48-hour week. This still represents a pay premium of 30-50% over commensurate permanent staff nurse positions at most facilities."[26]

These figures make it abundantly clear why, in September 2024, CNBC reported that: "Compared with permanent staff nursing positions, travel nurses enjoy more flexible contracts, opportunities for travel and higher salaries."[27]

Alan Schorr Testimony

Mr. Schorr testified: "These regulations do not create any new laws. They merely enforce what the Legislature has already passed. These regulations do not interpret the statute that is the province of the court."

That testimony must be questioned, according to numerous members of the New Jersey Legislature itself. Pushback on this claim from members of the Legislature has been bipartisan, from Democrats and Republicans alike.

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[25] Laila Ighani, "Understand the hidden costs of understaffing in nursing," Nursa, January 20, 2025
[26] "Travel Nursing in 2024: Pay Trends and What to Expect," AceStack, LinkedIn, March 21, 2024
[27] Mike Winters, "Earning 6 figures, working 9 months a year, traveling the country: What it's like to be a travel nurse, from those who have done it," CNBC, September 1, 2024

On June 4, 2025, New Jersey state Senators Johnson, Zwicker and Lagana—all Democrats and Senate committee chairmen—sent a letter to the Department, expressing concern that the Department's proposal "departs from the existing statute and case law controlling worker misclassification."

On July 23, 2025, New Jersey state Senator Parker Space and Assembly members Dawn Fantasia and Mike Inganamort, all Republicans, sent a letter to the Department, stating that: "This regulatory action represents a clear attempt to bypass the legislature, given that similar legislation has repeatedly failed to advance."

On July 29, New Jersey state Senator Declan O'Scanlon and Assembly members Gerry Scharfenberger and Assemblywoman Vicky Flynn wrote in a press release: "In the 2018-2019 Legislative Session, Democrats attempted to pass similar legislation but failed to advance it through the legislature due to strong opposition from freelance workers and New Jersey businesses."[28]

On July 31, New Jersey state Senator Patrick Diegnan—chairman of the Senate Transportation Committee—and his fellow Democrats, Assemblymen Robert Karabinchak and Sterley Stanley, sent a letter to the Department, stating that: "The question of how to classify workers has been considered repeatedly by the Legislature, and similar efforts to change the standard through statute have not gained approval."

Those documents are reproduced below, in full:

[28] Press release, "O'Scanlon, Scharfenberger, Flynn Slam Murphy Admin for Proposed Gig Worker Rule Change," New Jersey Senate Republicans, July 29, 2025

NEW JERSEY STATE SENATE

June 4, 2025

Hon. Robert Asaro-Angelo
NJ Department of Labor and Workforce Development
PO Box 110
Trenton, NJ 08625

Re: PRN 2025-051 – ABC Test; Independent Contractors

Dear Commissioner Asaro-Angelo,

The Department of Labor has proposed a new set of regulations to clarify the application of the "ABC Test" in determining the employment status of independent contractors. As Chairs of the Senate Labor, Legislative Oversight, and Commerce Committees, we are supportive of the Department's intent to protect workers' rights and ensure a level playing field for employers across the state. However, upon reviewing the rule proposal we are concerned that it departs from the existing statute and case law controlling worker classification.

We thank you for extending the public comment period to August 6, 2025, and holding a public hearing on the rule proposal. Given the substantial negative impact that these regulations may have on thousands of independent business owners who are properly classified, and the extensive public interest that it has already raised, the public hearing will ensure that this important proposal receives the careful deliberation that it deserves.

We look forward to working with you on the rule proposal and other issues that are important to New Jersey workers.

Sincerely,

Senator Gordon Johnson	Senator Andrew Zwicker	Senator Joe Lagana
Chair, Labor	Chair, Legislative Oversight	Chair, Commerce

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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

NEW JERSEY
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Declan O'Scanlon

Posted on: July 29, 2025

O'Scanlon, Scharfenberger, Flynn Slam Murphy Admin for Proposed Gig Worker Rule Change

Senator Declan O'Scanlon, Assemblyman Gerry Scharfenberger, and Assemblywoman Vicky Flynn (R-13) slammed Trenton Democrats for pushing a proposed rule change that might reclassify many gig economy workers from independent contractors to employees, making everything from youth athletics to food delivery more expensive.

In the 2018-2019 Legislative Session, Democrats attempted to pass similar legislation but failed to advance it through the legislature due to strong opposition from freelance workers and New Jersey businesses.

"Governor Murphy and his Department of Labor now seem to be coming back at this issue on their way out the door with their new rule proposal regarding independent contractors that, if what we're hearing from so many worried independent contractors is true, will only serve to make New Jersey more unaffordable for hardworking residents," **said Sen. O'Scanlon**. "That the policy, which could have a wide-reaching impact on everything from rideshare services like Uber and Lyft, to freelance writers and photographers, insurance agents, baseball umpires, and countless other professions, is happening without legislative input is

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- Declan O'Scanlon
- Joe Pennacchio

also concerning. The Governor, and the folks at the Department of Labor, should hear the terrified voices of these hard-working independent workers and abandon any effort or policy change that would negatively impact them. No one should want to lower pay, eliminate worker flexibility, and increase the cost of your next delivery order or the registration fee for your child's sports league. I'm looking forward to hearing from the Department after the comment period on this policy is over with assurance that they've heard from all those potentially impacted. As I've formed a good working relationship with the Department, I'm going to remain cautiously optimistic. Our system is working now, no one has made a sound argument for significant change. Devastating these people, as was attempted in California and attempted, and resoundingly defeated, here in 2019, isn't an option anyone in New Jersey should tolerate. We won't."

- Vince Polistina
- Holly Schepisi
- Robert Singer
- Doug Steinhardt
- Michael Testa
- Latham Tiver
- Carmen Amato
- Owen Henry
- Parker Space

"The proposed rule changes would be disastrous for anyone currently working as an independent contractor. There are many people who need the flexibility and freedom that working as an independent contractor gives them," **said Assemblyman Scharfenberger**. "Conversely, companies like the ability to hire individuals or small firms on a contract basis without encumbering more full-time employees. If these rule changes are implemented, it could literally cost people their livelihoods. This is a textbook example of government fixing what is not broken. The Governor and his administration should instead focus on the plethora of issues plaguing our state from their previous policies and legislation that's been implemented."

"Trenton isn't creating jobs — it's eliminating them," **said Assemblywoman Flynn**. "These rules punish workers who choose independence. Contracting isn't a loophole — it's a lifeline. Small businesses are already overtaxed and struggling to recover from COVID — nearly a third shut down during the pandemic, and most still haven't bounced back. Now Trenton wants to pile on more restrictions that would devastate their ability to survive. Bureaucrats shouldn't control how law-abiding residents earn a living. Trenton needs to stop micromanaging workers and crushing job creators. Governor Murphy must step in and stop this overreach now."

The proposed change seeks to reinterpret the long-standing "ABC test" used to determine whether a worker is an independent contractor or an employee causing thousands of gig workers—including rideshare drivers, financial advisors, truck drivers, freelance creatives, and on-demand service providers—to potentially lose their independent status, forcing businesses to treat them as employees. A similar proposal was passed into law in California in 2019, but was rolled back almost entirely just a year later after residents and gig workers were negatively impacted.

"Democrats in Trenton have continually made New Jersey more expensive so our fierce skepticism is well justified. This could easily be just another way that everyday New Jerseyans will be hurt by their disastrous policies instead of fostering an economy that supports flexibility, growth, and affordability," **O'Scanlon concluded.**

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July 31, 2025

Commissioner Robert Asaro-Angelo
New Jersey Department of Labor & Workforce Development
PO Box 110
Trenton, NJ 08625

RE: Concerns regarding the proposed independent-contractor rule (N.J.A.C. 12:11)

Dear Commissioner Asaro-Angelo:

We are writing to express our strong concerns regarding the Department's proposed rulemaking to revise and codify the test for classifying independent contractors under multiple state labor laws. While we fully support the Department's mission to prevent misclassification of workers, we believe the current proposal will create far-reaching and unintended consequences for New Jersey's workforce and economy.

Our concerns with the proposed rule are wide-ranging and substantive. First, many freelancers and independent contractors intentionally choose this structure for the flexibility it provides, allowing them to balance their professional responsibilities with personal demands. As proposed, broadening the application of the "ABC test" risks forcing many of these workers to be reclassified as employees. Such a shift would significantly limit opportunities for individuals who rely on the autonomy of independent work, including working parents, students, retirees, and professionals in creative or consulting fields.

In addition to the impact on workers, business organizations have expressed concern that the rule would drive up compliance costs and create legal uncertainty. Small businesses, which often depend on independent contractors to remain agile and efficient, could face restricted access to the talent they need. This could ultimately reduce job opportunities across the state.

The question of how to classify workers has been considered repeatedly by the Legislature, and similar efforts to change the standard through statute have not gained approval. The decision to

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implement such a major policy change through regulation, rather than legislation, and risks creating confusion among both workers and employers.

Given these factors, we strongly urge the Department to pause this rulemaking process and open the door for more inclusive stakeholder engagement. Taking additional time for review and discussion will allow the Department to better understand the real-world effects of the rule and to create a solution that protects workers without undermining the flexibility and economic vitality that independent work arrangements provide in New Jersey. With the public comment period now extended through August 6, 2025, there is a valuable opportunity to revisit this rule in a way that protects workers without harming the businesses and individuals who rely on independent work arrangements.

Thank you in advance for listening to and considering our concerns.

Sincerely,

Senator Patrick J. Diegnan

Assemblyman Robert J. Karabinchak

Assemblyman Sterley S. Stanley

Maya Pinto Testimony

Ms. Pinto's organization, the National Employment Law Project, issued a 2020 report[29] that relies in part on mischaracterized data from the 2019 Task Force Report, which itself mischaracterized the data in question.

The NELP study's appendix includes a table titled "Annual Losses Due to Independent Contractor Misclassification: Summary of Leading State Studies." In that table, the NELP report states that 38% to 42% of employers in New Jersey misclassify their workers. The NELP table's citation for that claim includes the Task Force Report.

The Task Force Report does, indeed, claim that the practice of misclassification "has increased by approximately 40% in the last ten years." Given that the report is dated July 2019, its claim is that the practice of misclassification rose 40% between 2009 and 2019.

However, the report's citation for that 40% claim is a *Harvard Business Review* article that instead states: "The use of independent contracting has grown dramatically over the past decade, with one estimate suggesting it has increased by almost 40%, going from 6.9% of employment in 2005 to 9.6% in 2015."[30]

That 40% estimate, per the *Harvard Business Review* article, came from a National Bureau of Economic Research study that also states the years when independent contracting grew were not 2009 to 2019, but instead 2005 to 2015.[31]

Neither *Harvard Business Review* nor the National Bureau of Economic Research claim that misclassification grew by 40%. They state that independent contracting grew by 40% between 2005 and 2015—years that include the Great Recession, which was the most severe economic downturn in the United States since the Great Depression. The Task Force and NELP reports, by mischaracterizing this data, simply erased this significant time period in our nation's history that clearly explains why independent contracting skyrocketed.

Unbelievably, several years after the Task Force Report was issued, yet another state agency mischaracterized this data. In a press release dated May 7, 2021, the New Jersey Department of the Treasury stated that misclassification "has increased by approximately 40 percent in the last 10 years," applying the statistic to the years 2011 to 2021.[32]

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[29] "Independent Contractor Misclassification Imposes Huge Costs on Workers and Federal and State Treasuries," National Employment Law Project, October 2020

[30] David Weil, "Lots of Employees Get Misclassified as Contractors. Here's Why It Matters," *Harvard Business Review*, July 6, 2017

[31] Lawrence F. Katz and Alan B. Krueger, "The Rise and Nature of Alternative Work Arrangements in the United States, 1995-2015," Harvard University, Princeton University and NBER, November 13, 2018

[32] Press release, "NJ Treasury Makes Gains in Fight Against Employee Misclassification," New Jersey Department of the Treasury, May 7, 2021

These are the facts about the years being erased from the original research: During the Great Recession, in a two-year span starting in December 2007, the unemployment rate rose sharply, from about 5% to 10%. In late 2009, more than 15 million people were unemployed. Total employment, as measured by the Current Population Survey, dropped by 8.6 million, or almost 6%.[33] Many people responded to losing their jobs in those years by turning to independent contracting so they could afford basic necessities. CNBC reported that freelancing during this time saw "explosive growth" and that professional freelancers were often earning more than the average hourly wage cited by the U.S. Bureau of Labor Statistics.[34]

Put simply, NELP's study, the Task Force report and the Treasury press release conveniently deleted the reality of what happened in the years of the Great Recession, in an apparent attempt to make readers believe that the problem of misclassification had exploded, when in fact, people's attempts to earn income as independent contractors became widespread during a period of massive traditional job losses.

It should also be noted that the Task Force report cites NELP's 2017 research as the basis for its claim that "between 10 and 30 percent of employers misclassify at least one employee as an independent contractor."

That 10% to 30% estimate, per May 2025 testimony by NELP's own Laura Padin before Congress,[35] comes from the antiquated Planmatics study whose research was done in the 1990s. However, NELP's leadership has made other claims about the source of this estimate, too. NELP's executive director, Rebecca Dixon, claimed in a 2024 *Newsweek* article that "a 2020 analysis" is the basis for this 10% to 30% claim.[36] The underlying research Dixon linked to from those words in her *Newsweek* article was not a 2020 analysis, but instead a 2009 Government Accountability Office report that states "the national extent of employee misclassification is unknown" and that cites data as old as 1984.[37]

Real-World Consequences

All of this highly questionable data has already had serious consequences in New Jersey. The Task Force Report has been used to justify the enactment of 10 new laws, the creation

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[33] U.S. Bureau of Labor Statistics, "Great Recession, great recovery? Trends from the Current Population Survey," April 2018
[34] Elaine Pofeldt, "Obama: Is the job of the future a freelance one?" CNBC, January 29, 2014
[35] Hearing, "Empowering the Modern Worker," U.S. House of Representatives Committee on Education & Workforce Subcommittee on Workforce Protections, May 20, 2025
[36] Rebecca Dixon, "Gig Economy Corporations Shouldn't Get a Free Pass To Exploit Workers," *Newsweek*, March 20, 2024
[37] GAO-09-717, "Employee Misclassification: Improved Coordination, Outreach, and Targeting Could Better Ensure Detection and Prevention," General Accountability Office, August 2009

of a state government office, and the granting of unprecedented powers for the state labor commissioner.[38]

State Senate and Assembly members alike should question whether the information that the Department has been presenting about independent contractors all these years is even rooted in reality—especially since even with all these new laws and powers that the Legislature granted based on the administration's claims, the Department can't seem to find or address very many cases of employee misclassification.

This much was evident at a state Senate Labor Committee hearing on March 10, 2022. Chairman Fred Madden, a Democrat, noted at one hour, eight minutes that when it comes to enforcing misclassification policy in New Jersey, Labor Commissioner Asaro-Angelo had only taken action in 44 cases after new laws had gone into effect.[39] According to the Department's own April 2025 press release, the first-of-its-kind misclassification penalty has assessed money to be paid to only about 12,500 misclassified workers since September 2021.[40] A July 2025 Department press release slightly shifted that 12,500 figure to only about 13,000 people.[41]

These results strongly suggest that the information the Department continues to present about independent contractors is wildly inaccurate; the Department is incompetent in addressing employee misclassification; or both.

Callous Disregard for Independent Contractors

Perhaps most troubling about the Department's proposed rule-making is that it shows callous disregard for the wishes of the vast majority of people it will affect: independent contractors in hundreds of professions all across New Jersey. These are people from all walks of life, in professions as wide-ranging as trucking, graphic design, photography, translation and interpretation services, financial advisement, writing, editing, event planning, video editing, bookkeeping and more.

State Senator Vin Gopal, who serves as Senate Majority Whip, stated this clearly along with his fellow Democrats, Assemblywomen Margie Donlon and Luanne Peterpaul, in

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[38] New Jersey Department of Labor & Workforce Development, "NJ Labor Department Proposes New Rules to Address Statutory "ABC Test" for Independent Contractor Status," April 28, 2025

[39] The archived video of this hearing is available to view at https://www.njleg.state.nj.us/archivedmedia/2022/SLA-meeting-list/media-player?committee=SLA&agendaDate=2022-03-1013:00:00&agendaType=M&av=V

[40] Press release, "NJ Labor Department Proposes New Rules to Address Statutory 'ABC Test' for Independent Contractor Status," New Jersey Department of Labor & Workforce, April 28, 2025

[41] Press release, "NJDOL Highlights Wins in Strengthening Worker Protections and Addressing Misclassification Under Murphy Administration," New Jersey Department of Labor & Workforce, July 15, 2025

a letter they sent to the Department and announced with a press release on July 21, 2025: "the Monmouth County legislators voiced their concerns that the proposed rule would hurt independent contractors."

That letter is reproduced below in full:

STATE OF NEW JERSEY

DR. MARGIE DONLON
Assemblywoman, 11th District

VIN GOPAL
Senator, 11th District
Majority Conference Leader

LUANNE PETERPAUL
Assemblywoman, 11th District

Press Release

For Immediate Release
July 21, 2025

Contact: **Dyese Davis, Chief of Staff, (732) 695-3371, ddavis@njleg.org**

Gopal, Donlon and Peterpaul Call for Labor Department Pause on New Independent Contractor Rule

SHREWSBURY - Senator Vin Gopal, Assemblywoman Margie Donlon, and Assemblywoman Peterpaul sent the following letter this week requesting New Jersey Department of Labor and Workforce Development Commissioner Robert Ansaro-Angelo pause a new rule that would redefine independent contractor status in the state, potentially creating serious disruptions for the state's businesses and employees.

In the letter, the Monmouth County legislators voiced their concerns that the proposed rule would hurt independent contractors by disrupting their relationships with small businesses, and creating new administrative burdens and new administrative costs that would impact consumer experiences. The letter is below.

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.

STATE OF NEW JERSEY

DR. MARGIE DONLON
Assemblywoman, 11th District

VIN GOPAL
Senator, 11th District
Majority Conference Leader

LUANNE PETERPAUL
Assemblywoman, 11th District

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.

Sincerely,

Vin Gopal
Senator, 11th District

Margie Donlon
Assemblywoman
11th District

Luanne Peterpaul
Assemblywoman
11th District

###

Senator Vin Gopal, a lifelong resident of Monmouth County elected in 2018, serves as Senate Majority Conference Leader and Chair of the Senate Education Committee. Assemblywoman Dr. Margie Donlon, a practicing physician, serves on the Assembly Health and the Tourism, Gaming & the Arts Committees; Assemblywoman Luanne Peterpaul, Esq., serves on the Assembly Commerce, Economic Development & Agriculture and the Aging & Human Services Committees. They represent residents of Allenhurst, Asbury Park, Bradley Beach, Colts Neck, Deal, Eatontown, Fair Haven, Freehold Borough, Freehold Township, Interlaken, Loch Arbour, Long Branch, Neptune City, Neptune Township, Ocean Township, Red Bank, Shrewsbury Borough, Shrewsbury Township, and Tinton Falls in the State Senate and State Assembly.

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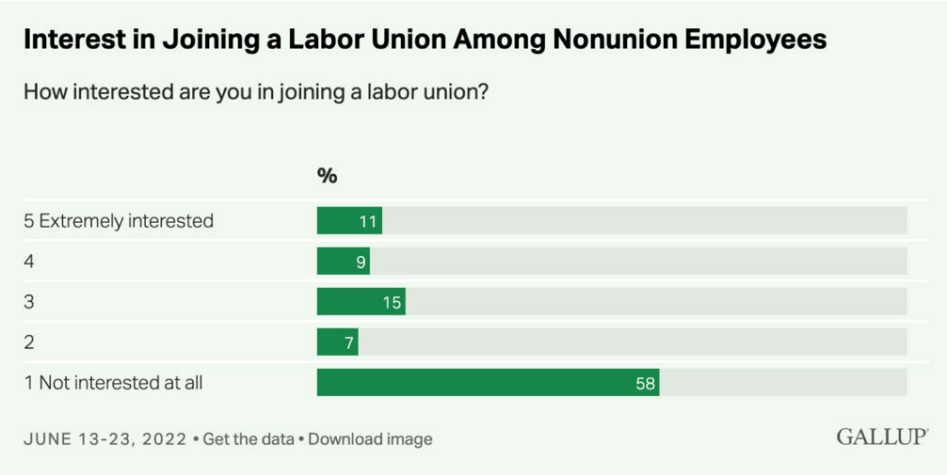
PHONE: (732) 695-3371 • FAX: (732) 695-3374

According to the U.S. Bureau of Labor Statistics, only 8.3% of independent contractors would prefer a traditional job.[42] The vast majority of us do not wish to be reclassified as employees—something any of us could choose to be, right now. Nobody is stopping us from applying for traditional jobs. Some independent contractors are doing side hustles while also holding down traditional jobs. Whether our independent contracting roles are for a single hour each month or 24/7/365, we are all exercising our fundamental freedom to earn income through self-employment, a freedom that has existed since the day our nation was founded.

This isn't even an 80/20 issue among independent contractors. It's a 90/10 issue that the Department is on the wrong side of when it comes to the stakeholders directly in the proposed rule's crosshairs. The Department is attempting to create government of, by and for the union organizers, instead of doing its duty to serve as government of, by and for all the people.

It is understandable why union organizers would like to see government weaponized to try and augment union membership by forcing independent contractors out of work that cannot, by law, be unionized. Union membership is at an all-time low,[43] and according to Gallup,[44] 80% of employees currently eligible for unionization either do not wish to join, or are at best neutral on the subject:



What is not understandable, and what is not excusable, is the Department's abject failure to include the wishes of independent contractors in rule-making specific to

[42] U.S. Bureau of Labor Statistics, "Contingent and Alternative Employment Arrangements—July 2023," released November 8, 2024
[43] Michael S. Derby, "US labor union membership slips in 2024 to record low," Reuters, January 28, 2025
[44] Justin McCarthy, "U.S. Approval of Labor Unions at Highest Point Since 1965," Gallup, August 30, 2022

independent contractors. This blatant omission of key stakeholders from the rule-making process flies in the face of Governor Murphy's own Executive Order No. 63, which was signed June 1, 2019, and states:

> "The options State entities should consider may include, but are not limited to: i. Gathering information through meetings and/or other discussions with affected communities in advance of formulating a proposed rule; and/or ii. Publishing and broadly disseminating a notice of pre-proposal, and seeking comments.
>
> "The means selected should be tailored to enable the State entity to accomplish its regulatory goals. Where a proposed rule is new, or makes significant and/or expansive changes to existing rules, the benefit from extensive stakeholder outreach will be greater."

According to analysis published online by attorneys from multiple law firms, and according to attorneys and experts who testified at the June 23 public hearing, the proposal that the Department has put forward will severely restrict the ability to be an independent contractor in the State of New Jersey. Richard Reibstein, an attorney with Troutman Pepper Locke, actually used the word "eviscerates" in his legal analysis of the proposed rule:

> This view of the second part of the 'B prong' almost entirely eviscerates any chance for most ICs and companies using their services from establishing the workers' IC status. In addition, this part of the proposed regulation appears to be directly contrary to one of the two main New Jersey Supreme Court cases cited in the Summary of the proposed regulation: Carpet Remnant Warehouse.[45]

That would be a significant and expansive change to existing rules and case law, but the Department has failed to seek out or engage in meaningful stakeholder outreach with even the most vocal members of Fight For Freelancers that this proposed change would affect. The Department could easily find us, since many of us testified in December 2019 against the similar policymaking attempt by the Legislature. Our names are all in the public record. And the Department was paying attention to that hearing in 2019; the day after it occurred, Asaro-Angelo personally called me at my home in Morris County. He clearly knows how to find me in particular, yet he chose not to do so prior to the Department proposing this independent-contractor rule.

Instead, the Department did everything in its power to try and ensure that participation by independent contractors in this rule-making process was minimized. The Department failed to allow remote testimony at the public hearing on June 23, 2025, and it limited oral testimony to just four minutes per witness who drove to Trenton and appeared

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[45] Richard Reibstein, "Garden State May Soon Become Even Less Hospitable to Independent Contractors Than the Golden State," Troutman Pepper Locke, May 1, 2025

in person that day during a heat wave, sometimes waiting more than three hours amid the standing-room-only crowd to speak.

The Department's representative who conducted the public hearing avoided any meaningful engagement with independent contractors who appeared as witnesses. He asked follow-up questions of several witnesses, but no follow-up questions of the numerous independent contractors who testified against the proposal that day.

Intentional Harm

The harm that this type of anti-independent-contractor policymaking has done, and continues to do, is well-documented. New Jersey's Legislature rejected this type of policymaking a half dozen years ago with good reason. Congress and the U.S. Department of Labor are moving now to protect independent contractors nationwide from this type of policymaking, given its catastrophic results.

The 2019 Task Force report that the Department cited when announcing this proposed rule[46] is riddled with questionable claims that require further investigation. The undue influence of labor unions and union-affiliated organizations offering questionable testimony as part of the Department's rule-making process also creates grounds to call for an investigation of the Department's actions—especially in the face of such overwhelming public opposition to the Department's proposal and to this type of policymaking in general.

Consequences for this type of policymaking were called "unintended" in 2019. That is no longer accurate. With this proposal, the Department intends to harm New Jersey's independent contractors. The predictable injury to people's incomes, careers and livelihoods is capricious and inexcusable, as is the predictable psychological harm this may cause for families throughout the Garden State, and the physical harm that may result from people being unable to pay for shelter, food and health care.

This proposed rule is a direct attack on everyone's fundamental freedom to earn a living as an entrepreneur, promulgated in remorseless defiance of our nation's promise of liberty and the pursuit of happiness.

For all these reasons, Fight for Freelancers urges the Department to rescind this proposal in full, immediately.

Kim Kavin, co-founder, Fight For Freelancers

(908) 975-3031, kim@kimkavin.com

[46] New Jersey Department of Labor & Workforce Development, "NJ Labor Department Proposes New Rules to Address Statutory 'ABC Test' for Independent Contractor Status," April 28, 2025

From: Kris King
To: Fish, David [DOL]
Subject: [EXTERNAL] SUBJECT LINE: Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 3:48:45 PM

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Report Suspicious

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Kristine King
President
KARL WEIDEL INSURANCE
TRENTON, NEW JERSEY

From:	Christine Myers
To:	Fish, David [DOL]
Cc:	Andree Laney
Subject:	[EXTERNAL] Proposal Number: PRN 2025-051; ABC Test; Independent Contractors Proposed New Rules: N.J.A.C. 12:11
Date:	Tuesday, August 5, 2025 3:50:58 PM
Attachments:	ABC Test Comments to NJDOL-8-5-2025 FINAL.pdf Anonymized_IC_Roundtable_Notes-FINAL.pdf

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Report Suspicious

Dear Executive Director Fish,

In response to the New Jersey Department of Labor's proposed Independent Contractor Rules, the Employers Association of New Jersey (EANJ) recently convened an employer roundtable to inform and engage businesses and stakeholders who may be affected by these proposed changes.

Participants shared both general and detailed feedback, expressing serious concerns about the potentially significant and adverse impact the rules could have on their operations. Many attendees were unclear about how the rules would be implemented and surprised they had not previously been made aware of the proposed changes. Others conveyed deep concern that the rules, if adopted as written, could result in financial hardship, loss of clients, and an inability to grow or sustain their businesses.

As an organization committed to advancing the success of New Jersey employers, particularly in matters of employee relations and human resources, EANJ is dedicated to fostering informed and constructive dialogue on issues of public policy. In that spirit, we respectfully submit the following documents for your review:

- A summary of EANJ's comments on the proposed Independent Contractor Rules
- Anonymous and specific feedback from New Jersey employers across a broad range of industries

We welcome the opportunity to provide additional insights and collaborate to ensure that the final rules effectively prevent worker misclassification while also fostering a business environment that supports entrepreneurship, growth, and increases economic vitality in New Jersey.

Sincerely,

Christine Myers
President
(908)451-7415
christine@eanj.org

293 Eisenhower Parkway – Suite 160
Livingston, NJ 07039
www.eanj.org

Please be advised that this email represents relevant information in regard to your request. It is provided with the understanding that it does not constitute an authoritative opinion and that EANJ is not engaged in rendering legal or accounting services.

August 5, 2025

Via Email: david.fish@dol.nj.gov
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
Fax: (609) 292-8246

Re: Proposal Number: PRN 2025-051; ABC Test; Independent Contractors
Proposed New Rules: N.J.A.C. 12:11

Dear Mr. Fish:

The Employers Association of New Jersey ("EANJ") supports the New Jersey Department of Labor's (NJDOL) mission to protect workers and promote clarity in employment standards. To that end, we appreciate the opportunity to submit this collection of comments in response to the NJDOL's notice of proposed rulemaking on the ABC Test for Independent Contractors Proposed New Rules: N.J.A.C. 12-11 (hereafter "the ABC Test Rule" or "Rule"). See 57 N.J.R. 894(a) (PRN 2025-051). Founded in 1916, EANJ is a trade association consisting of approximately 500 small and large private businesses, nonprofits, and municipalities which employ over 92,000 individuals throughout New Jersey. At EANJ we not only counsel businesses on compliance with existing rules, we also encourage those businesses to dialogue directly with their legislators about the impact of current and proposed legislation on their respective businesses.

On July 24, 2025, EANJ met with over 23 NJ businesses spanning of varying sizes and industries, including the arts, media, transportation, manufacturing, recreation, consulting, financial services, landscaping and real estate. The major concerns of those businesses, whose comments are attached in full, can be summarized as follows:

1. Misalignment of the ABC Test with Modern Business Models

- **The Prong 'B' Problem:** The requirement that independent contractors operate "outside the usual course of business" does not capture or reflect modern freelance and service models. Journalists, consultants, creative

professionals, licensed professionals, coaches and educators often provide core services independently but would appear to be unfairly disqualified under this definition. Additionally, the definitions of the 'usual course of business' remain as "elusive" and "confusingly vague" as when described by New Jersey's Supreme Court in Carpet Remnant Warehouse v. Dept. of Labor, 125 N.J. 567, 584 (1991) (citations omitted). "Usual course of business" includes "activities… to generate revenue or… provide goods or services" (N.J.A.C. 12:11-1.4(b)); "Places of business" can include residences of customers if services are "essential" (N.J.A.C. 12:11-1.4(g)). Finally, the Rule's effort to clarify these factors by giving examples (at N.J.A.C. 12:11-1.4(c) – (g)) rather than a consistent standard makes planning for – or advising on - compliance difficult. The resulting confusion leaves the businesses uncertain and at risk.

2. Threat to Entrepreneurship and Public Access to Products and Services

- **Loss of Flexible Opportunity:** Many sole proprietors, including coaches, consultants, and artists, rely on flexible contracting arrangements to sustain income and pursue small business growth. The Rule as written would restrict their ability to build client networks independently. Additionally, it would all but eliminate those "foot-in-the-door" opportunities for young people, other new entrants to the job market, would-be entrepreneurs (including stay-at-home parents and retired individuals) and those requiring flexibility to launch businesses in NJ.
- **Impact on Underserved Areas:** The proposal could unintentionally limit access to services such as financial counseling, performing arts, and youth coaching by narrowing the pathways for independent service providers to operate locally in areas to which existing businesses do not extend.

3. Economic and Operational Burdens

- **Increased Compliance Costs:** Businesses estimate substantial financial strain if contractors are reclassified. Administrative setup and overhead costs, benefit contributions, and legal reviews could threaten viability for small firms and nonprofits, many of which rely on contract-based talent for project delivery.
- **Market Competitiveness Risks:** Freelancers offer affordability and efficiency. Reclassification requirements would force businesses to absorb new costs or reduce services, undermining their ability to compete and deliver in a fast-paced economy.

4. Industry-Specific Disruptions

- **Port Trucking Vulnerability:** Over 75% of port truck drivers are owner-operators. Reclassifying them risks destabilizing supply chains, eliminating flexible surge capacity, and jeopardizing thousands of jobs.

- **Impact on Arts, Sports, and Education:** Independent performers, instructors, and recreational staff often work episodically. The proposed rule could force formal employment for temporary arrangements, resulting in reduced programming and loss of community engagement.

5. Lack of Legal Clarity

- **Federal vs. state frameworks:** With the recent US Department of Labor's decision to withdraw the 2024 independent contractor rule and return to the "economic realities" test, the federal standard provides greater latitude. Businesses may mistakenly assume federal compliance suffices under New Jersey law, increasing the risk of misclassification and enforcement exposure.
- **No clear state guidance to aid compliance:** The ABC Test Rule equips businesses and those who seek to help them comply with non-exhaustive lists of factors that provide no prioritization or weighting. The businesses are required to guess at relevant current or additional factors and how much weight any factor should receive. **Examples:** *"The factors listed… shall not be used as a checklist… There is no set number of factors that will, in every instance, result in a finding"* (N.J.A.C. 12:11-1.3(e), 1.5(d)); *"The factors… are not exhaustive and additional factors may be considered"* (N.J.A.C. 12:11-1.3(d), 1.5(c));*"Proof of business registration… is not alone sufficient to meet Prong C"* (N.J.A.C. 12:11-1.5(g)); *"Proof… of liability insurance and/or workers' compensation insurance… is not alone sufficient"* (N.J.A.C. 12:11-1.5(h)).

Accordingly, although appreciative of NJDOL's intent to protect vulnerable workers and ensure fair labor practices, EANJ respectfully requests that NJDOL radically modify the ABC Test Rules to provide a more transparent, balanced, and nuanced framework that supports legitimate independent businesses and the broader New Jersey economy. The foregoing businesses uniformly spoke of a need for a "modernized" rule that reflects the evolving nature of work and offers clearer guidance.

Finally, once the ABC Test Rule is improved, we urge the NJDOL to implement a "safe harbor" or "amnesty program" and an ongoing implementation plan to promote education, encourage voluntary compliance, reduce confusion, and empower responsible businesses to correct mistakes. A safe harbor program would allow businesses to reclassify workers without immediate penalties, provided they act in good faith within a defined time window. A NJDOL-administered self-audit program could also empower businesses to examine classifications without triggering punitive action. Outreach efforts could be scaled alongside such an initiative to educate businesses and increase voluntary participation.

Such an approach would offer multiple benefits, such as encouraging self-correction ahead of enforcement, facilitating prompt resolution and back wage

payments to workers, reducing the administrative burden on NJDOL's enforcement, and incentivizing businesses cooperation and transparency. By incorporating flexible compliance pathways like a safe harbor program, NJDOL can foster a culture of accountability and education rather than fear and avoidance. EANJ urges the NJDOL to revisit the proposed rule with these considerations in mind.

We thank you for your ongoing efforts in this regard.

Respectfully,

/APL/

Andrée Peart Laney, Esq.
Director, Compliance and Training

EANJ Independent Contractor Roundtable – July 24, 2025

- **Recreational Facility Owner**
  - The facility provides attendees with access to athletic instruction, but it is not their main business. It engages the instructors as independent contractors. The facility has no control over the content the instructors provide, which is specific to the sport and the facility would not be able to correct the content or otherwise provide 'control'.
  - Revenue to the facility generated from the lessons is ancillary. It is not profitable for the facility. 90% of instruction fees go directly to the instructors.
  - If the instructors were classified as employees, the only people to lose would be the individuals giving the lessons as we would have to eliminate this popular service from our business.
  - **Question:** would the instructors need to be covered by our Workers' Compensation insurance?

- **Lifestyle Media Representative**
  - The organization contracts with freelance writers to write articles for them about the specific industry. Last year, they were targeted by an audit in California that determined that the freelancers were employees because writing is a core part of the organization's revenue stream. The determination disregarded that freelance writing is its own independently established trade and that freelancers often approach media outlets to pitch their own ideas.
  - When they put on events, they will sometimes bring in photographers. **Questions:** are the photographers outside of the usual course of business? Does the analysis turn on whether the person is a professional or amateur photographer?

- **Financial Advisor**
  - **Question:** Does a determination that a business is an employer then obliger the business to provide a 401k and other benefit plans? That would be significant - the Advisor has small clients that do not know how they could possibly extend these benefits.

- **Trucking Industry Representative**
  - We have been dealing with this a long time in NJ and this version is worse.

- The current trucker exemption eliminates significant numbers of independent contractors, leaving them vulnerable to reclassification and thereby jeopardizing their livelihoods. It is hard to see how the average truck drivers would qualify under the ABC Test Rule as an independent business; most drivers do not have a website. The examples under the Rule suggest that the NJDOL would get rid of all the current exemptions.

- **Recreational Facility Owner**
  - Youth sports have grown tremendously. Many organizations pay coaches or sports officials through the 1099 process, yet according to the ABC Test it appears they are being "controlled" if their schedules are being set. **Question:** Would their having a business registration certificate help us to make the determination if this is a separate business or should it be our employee?

- **Performing Arts Facility**
  - **Questions:** would a performing artist who is hired for a one-off show be impacted by this? Will the exclusions to the ABC Test in the unemployment insurance benefits law continue to apply after the ABC Test is passed? What about a visual artist who exhibits their work for a period of time – would they be an employee? What if someone buys their artwork? If it arguably enriches both the artist and the facility, does the facility become the artist's employer?

- **Financial Services Representative**
  - **Question:** When I render services to a business, should I ask it to provide both a 1099 and a W2?
  - As a financial services agent, I'm an entrepreneur. I run my own business, serve my clients independently, and chose this path for its flexibility and control. This rule would jeopardize that.
  - I work with a large life insurance company, which is owned by its policyholders -- not shareholders. It has a large presence in New Jersey with 195,000 policyholders, 1700 employees, and 850 agents. In 2024, it paid out $183 million in benefits to New Jersey families.
  - This Rule would:
    - Undermine small businesses like mine. My independence is central to how I serve my community.
    - Reduce consumer access to life insurance and financial advice, especially in underserved areas.

        - Impose a test that doesn't fit the nature of our industry.
    - At the life insurance company, agents like me already have access to benefits such as health care and retirement plans while keeping our independence. Reclassifying us as employees would take away that independence without providing meaningful gains.

- **Regional Trade Organization Representative**
    - Many of their members are consultants (they have consulting businesses) and they may have contracts with organizations to provide services such as coaching – they are contracting with registered businesses and sometimes hire subcontractors. **Question:** are those consulting businesses themselves the clients' employees?

- **Consulting Business Owner**
    - The individual employs one employee and works with 10 independent contractors. While the owner drafts the independent contractor agreement, the contractors (who are all professionals) negotiate certain items. The ABC Test Rule suggests that the contracts might be invalid because the owner did the first draft. The business model would fail if those professionals cannot be independent contractors.
    - My business is a project-based consulting business. Clients seek my services, and I find the appropriate professionals to assist me with work delivery. Once the project is done, so is the independent contractor's pay and our working relationship. Nearly all my independent contractors have their own LLCs and work with other clients and businesses. None work solely with consulting business.
    - Reclassifying my independent contractors as employees will have the following impact:
        - Potential Revenue loss of $25,000
        - Costs to reclassify: biweekly expense of $200, one-time fee of approximately $2,000
        - Admin Time/Effort: estimated at 40 hours or $7,000
        - Increased costs passed on to employees: $30,000
    - The cumulative effect of all of the above impacts is the potential for me to lose my strong working relationship with my independent contractors that could result in my entire business enterprise being compromised.

- [Referring to another attendee, a landscaper] That business owner could potentially have the contractor contract directly with the customer, but that's no way to run a business.

- **Commercial Real Estate Representative**
  - **Question:** how does the ABC Test Rule impact real estate brokers who all sign an independent contractor agreement? They offer voluntary training to these brokers; is that "control"?

- **Landscaping Business Owner**
  - The owner sees some gray areas. The business contracts with plumbers, electricians, but also tree removal and fertilizer guys. **Question:** which of those individuals or businesses are in "the course of his business" under the Prong B? The Rule is not clear on that.

- **Non-Profit Arts Organization**
  - Assigning independent contractors as employees could create unnecessary burdens for non-profit arts organizations by creating liabilities for the organizations regarding unemployment. The requirement of benefits like mandatory NJ sick leave for these workers would also increase the financial burden to the organizations. Organizations would experience an increase in HR and administrative costs.
  - Increased costs would require raising prices for classes which support the objectives of the organization and the intent of funders like the New Jersey State Council on the Arts.
  - Under the ABC Test, our allowing artists to sell their work through a commission-based sale in our galleries (on which we must pay tax) would be to make them our "employees". Non-profit, community arts organizations do not generally have the capacity to run the number of instructional programs that can support significant income for individual artists. As a community-based non-profit, the significant increase in the tax burden imposed on the organization would challenge our financial stability as we already function at break-even levels.
  - When onboarding employees, an organization takes on not only the financial burden, but an additional administrative and human resources burden. And with many programs that run only one time or for a few days or weeks, it is not possible for us to establish a suitable review period for such "new employees." Without a review period, organizations would be less likely to

take on many new instructors classified as employees (because of the administrative cost), which would ultimately reduce the ability of the organization to provide opportunities to a greater number of artists and reduce the income those individuals can put back into the economy.

- Additionally, with arts funding in South Jersey disproportionately lower than in North Jersey, the ABC Test Rule could have a significantly negative impact on arts organizations throughout the region. A study in 2001 revealed that contributed income sources in NJ favor the northern part of the state by as much as 25:1 (foundations, corporations, etc.). While the governor approved a budgetary mandate that traditionally allocates 25% of the state arts budget to the eight southern counties it is not guaranteed. Meanwhile, the southern county populations continue to increase and are now over 27% of the state's population and growing.
- As a result of the foregoing issues, the ABC Test Rule could significantly reduce the number of artists with whom an organization could work, thus stifling artistic creativity and innovation and rendering unsustainable our organization's ability to evolve and support the community.

From: Bill Feeney
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposed New Rule Regarding Independent Contractors: N.J.A.C. 12:11 – Support 57 N.J.R. 894(a), Vol. 9 (May 5, 2025)
Date: Tuesday, August 5, 2025 3:52:39 PM

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Mr Fish,

I am writing as a resident in NJ to express my support for codifying New Jersey's statutory "ABC test" for determining independent contractor status as well as the sentiments expressed to you in the letter below

https://www.hrw.org/news/2025/08/05/human-rights-watch-letter-to-new-jersey-department-of-labor-workforce-development

Bill Feeney
20 Southern Terrace, Montclair, NJ 07042

From: Bob Conner
To: Fish, David [DOL]
Subject: [EXTERNAL] NJAC 12:11
Date: Tuesday, August 5, 2025 4:02:28 PM
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Comment on Proposed Worker Classification Rule.docx

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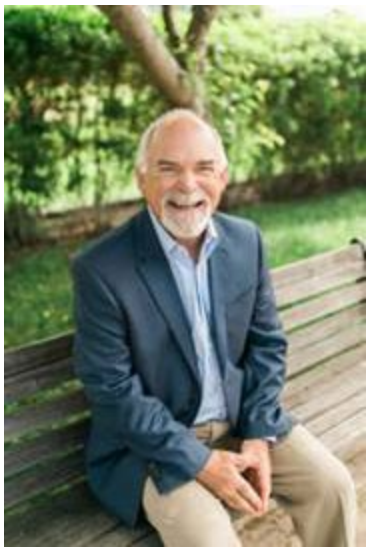
David,

Please see my attached comments on the proposed rule change!



Robert A. Conner
President
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Comment on Proposed Worker Classification Rule (N.J.A.C. 12:11)

Dear Mr. Fish,

As the owner of an independent insurance agency in New Jersey, I'm writing to express my concerns with the Department's proposed worker classification rule.

Independent insurance producers—myself and my team included—have long operated as independent contractors. We're licensed professionals who work with multiple carriers, giving our clients access to a wide range of insurance products and pricing.

This model benefits consumers, encourages competition, and allows small businesses like mine to serve our communities effectively.

The proposed regulation does not clearly state that licensed insurance producers are exempt from the ABC Test. While the Department acknowledged at the June 23 hearing that producers remain exempt under current law, that important clarification needs to be included in the text of the final rule. Without it, insurers may reduce or restrict their relationships with independent agencies out of fear of legal exposure, which would harm small agencies and limit options for consumers.

I urge the Department to revise the proposed rule to explicitly state that licensed insurance producers are exempt from the ABC Test. That small but important change would reflect existing law, maintain clarity, and protect the business model that supports thousands of producers and their clients across New Jersey.

Thank you for considering my comments.

Robert A. Conner, Pres

Mints Insurance Agency

Millville, NJ 08332

From: eagleagcy@aol.com
To: Fish, David [DOL]
Subject: [EXTERNAL] URGENT - ABC LEGISTATION
Date: Tuesday, August 5, 2025 4:05:25 PM

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Mr. Fish,

Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Dear Mr. Fish,
I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.
Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.
Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers
are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like
mine.
At the June 23 hearing, the Department acknowledged that insurance producers are still
treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.
I respectfully urge the Department to revise the proposed regulation to include specific
language stating that licensed insurance producers are exempt from the ABC Test. This
would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.
Thank you for the opportunity to comment.
Please understand how this affects every contract we as Independent Agents have.

Thank you

Kathy Sieranski
Independent Agency Producer for over 40 years

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From: Mario DeFilippis
To: Fish, David [DOL]
Subject: [EXTERNAL] N..J.A.C.12:11
Date: Tuesday, August 5, 2025 4:09:27 PM
Attachments: image001.png
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N.J.A.C. 12.docx

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David Fish
Executive Director of Legal & Regulatory Services

Dear Mr. Fish,
Please see attached letter. Thank you.

Mario DeFilippis | Vice President
License#: 0M63276

O: 732.686.7020 | **M**: 908.513.8588 | **E:** mdefilippis@whartoninsurance.com

101 South Livingston Ave, PO BOX 1660, Livingston, NJ 07039

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Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Mario DeFilippis
Vice President
ALKEME / Wharton Group
Livingston, NJ 07039

From:	Lisa Chapland, Esq.
To:	Fish, David [DOL]
Cc:	Chantel Amissah; sbalsamo@njsba.com
Subject:	[EXTERNAL] NJ State Bar Association Comments on Proposed New Rules N.J.A.C. 12:11 - ABC Test; Independent Contractors
Date:	Tuesday, August 5, 2025 4:10:45 PM
Attachments:	NJDOL - ABC Test - Final.pdf

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Please see the attached comments from the New Jersey State Bar Association on Proposed New Rules N.J.A.C. 12:11 – ABC Test; Independent Contractors. Thank you for the opportunity to submit them.

Regards,
Lisa

Lisa Chapland, Esq.
Assistant General Counsel, Government Affairs
NJSBA
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August 5, 2025

Via Electronic Mail (david.fish@dol.nj.gov)
David Fish, Executive Director
Legal and Regulatory Services
Department of Labor and Workforce Development
Post Office Box 110, 13th Floor
Trenton, New Jersey 08625-0110

Re: Proposed New Rules: N.J.A.C. 12:11 – ABC Test; Independent Contractors

Dear Mr. Fish:

On behalf of the New Jersey State Bar Association, I submit these comments raising significant concerns with the New Jersey Department of Labor and Workforce Development's ("Department") proposed new rules to address the classification of employees and independent contractors ("Proposed Rules"). These Proposed Rules outlining the application of the ABC test narrow the scope of independent contractors through overbroad interpretations of well-settled case law and generalized application of factors to a test which "determination is fact-sensitive, requiring an evaluation in each case of the substance, not the form, of the relationship." Carpet Remnant Warehouse, Inc. v. New Jersey Dept. of Labor, 125 N.J. 567, 581 (1991); East Bay Drywall, LLC v. Dept. of Labor and Workforce Development, 251 N.J. 477, 496 (2022). The NJSBA opposes these Proposed Rules and strongly urges the Department not to adopt them.

The Proposed Rules conflate existing case law and Department interpretation of the ABC test, expanding the reach of employee classification and narrowing independent contractor status. As it pertains to attorneys, the Proposed Rules significantly impact solo and small law firms by potentially misclassifying *per diem* attorneys and removing flexibility in staffing. Under the Proposed Rules, even pool attorneys used by the State and Federal government – namely the Office of the Public Defender and those assigned under the federal Criminal Justice Act – could be misclassified as employees under the Department's interpretation of the ABC test.

The Proposed Rules are a confusing amalgamation of factors from cases that span decades, and do not take into consideration the realities of the current work force which seeks flexibility and work life balance. Workers today may choose to work remote or engage in various aspects of the gig economy where they can decide when and what kind of work to take on. The case law fairly and clearly articulates the ABC test. But by enumerating "non-exhaustive factors"

in a set of rules that look and feel like a checklist despite the Department's admonition that they are not, the Department has attempted to circumvent the Court's holding that the ABC test is "fact sensitive."

The Proposed Rules use outdated factors interpreted in a context that no longer exists; fail to consider the misapplication of the ABC test on professionals, such as attorneys, financial services workers, accountants, insurance agents and nurses, who have specific training and licensure requirements and are subject to regulatory supervision; and potentially lead to an unnecessary uptick in challenges because of the abundance of "non exhaustive" factors that beg more questions than provide answers to the status of employee versus independent contractor. In fact, consistent with the case law, there should be no bright line definition or set of factors that could fairly and accurately classify certain types of workers without a lengthy list of exemptions, similar to the extensive list that exists in California.

The impact of these Proposed Rules may not only be felt by all attorneys, but also by the professionals regularly engaged by attorneys in the practice of law. These rules would be most detrimental to solo and small firms – the same firms used by a large number of New Jersey residents for their legal needs. A majority of attorneys licensed in New Jersey associate themselves with solo or small law firms. Solo and small firms rely on flexible staffing models to deliver quality legal services at more affordable prices. The broad interpretation of the ABC test, which potentially misclassifies attorneys as employees of solo or small firms is a costly endeavor that makes access to justice unnecessarily more expensive and less accessible.

Unlike larger firms that have the resources to employ attorneys in specialized areas of the law, solo and small firms often use the services of *per diem* counsel as the need arises. The ABC test – in particular the expansion of Prong C – risks misclassification of these *per diem* attorneys for simply lacking formal business trappings, despite functioning as *bona fide* independent businesses.

The current proposal subjects even short-term, low-dollar-value engagements to the full weight of the ABC test. This will deter small firms from bringing in limited-scope assistance to the detriment of their clients. Even for legitimate contractors, the burden of proof shifts entirely to the firm to show all three prongs of the test. This burden-shift will have a chilling effect, particularly on firms working with new or smaller contractors and professionals such as new parents, semi-retired attorneys, or paralegals who intentionally avoid business formalities, but work independently in fact. These Proposed Rules make susceptible to misclassification a majority of those who provide services to small law firms, most of which use these flexible contractor relationships not to avoid taxes, but to manage fluctuating caseloads and offer flexible, inclusive work opportunities.

The Proposed Rules conflate this legally required review with employment control, as it is the Department's position, without citing any support, that control to ensure compliance with a law or rule "shall be given equal weight to what would be given any other control or direction." See N.J.A.C. 12:11-1.3(f). In this regard, the Department overlooks Law Office of Gerard C. Vince, LLC v. Bd. of Review, Docket No. A-5441-17T2, 2019 WL 4165066 (App. Div. Sep. 3, 2019), where the court held that a paralegal was properly classified as an independent contractor under the ABC test although some supervision was exercised to ensure the paralegal's compliance with the Rules of Professional Conduct.

There are myriad scenarios where an attorney may be misclassified as an employee under the Proposed Rules and for that reason, examples are both easy to provide and too many to list. Prong A of the ABC test addresses whether a putative employer exercises control or direction over the individual's work or that the putative employer reserves the right to control or direct that individual's work. If an attorney drafts correspondence or a brief using the logo of the firm, is that control? See N.J.A.C. 12:11-1.3(c)(2)(i)(b). If the person uses the firm's software to store files associated with a particular matter, is that control? See N.J.A.C. 12:11-1.3(c)(2)(i)(c). If the firm provides training to the attorney in order to utilize the firm's software, is that control? See N.J.A.C. 12:11-1.3(c)(9). Nevertheless, even if all three exist, or none exist, these factors "are not exhaustive and additional factors may be considered." See N.J.A.C. 12:11-1.3(d).

Of significant concern is the Department's dismissal of case law holding that the regulatory or legally required supervision cannot be confused with control. In 2019, the District Court held that an insurance company did not exercise control and direction over insurance agents that are subject to regulatory guidance and state and federal law. Walfish v. Northwestern Mutual Life Ins. Co., No. 2:16-CV 4981, 2019 WL 1987013, at *7 (D.N.J. May 6, 2019). "Were that so, any business operating in a regulated industry would necessarily no longer be able to hire workers under an independent contractor relationship unless it was willing to risk regulatory non-compliance." Id. Like insurance agents, attorneys and those professionals retained by attorneys are subject to rules governing their practice. The Rules of Professional Conduct are promulgated by the New Jersey Supreme Court, which is vested with the sole authority to govern the practice of law. See N.J. State Constitution, Article VI, Section II (1947). Attorneys are bound by the Rules of Professional Conduct to ensure proper supervision over those with whom they work to avoid the unauthorized practice of law. See In re Opinion No. 24 of the Committee on Unauthorized Practice of Law, 128 N.J. 114, 127 (1992); see also Rules of Professional Conduct 5.1, 5.2, and 5.3. This includes non attorneys. See RPC 5.3.

In 2019, the Appellate Division reversed the finding of the Department that a paralegal was an employee. Vince, 2019 WL 4165066, *4. In analyzing Prongs A and B, the Appellate Division disagreed with the Department that the firm exercised control over the paralegal beyond that "required by the Rules of Professional Conduct." Id., at *3. Compare this to Mia Tomasello v. ICF Tech, Inc., No. CV 23-3759, 2025 WL 1177718, at *12 (D.N.J. Apr. 23, 2025) where the court noted that in determining control under the ABC test, the contractual requirements went "beyond legal compliance" therefore the ABC test was not met. This approach is in line with how other jurisdictions have treated regulatory supervision in the ABC test context. See Global Home Care, Inc. v. State, Dep't of Labor, 521 So. 2d 220, 222 (Fla. App. 2003) (quoting NLRB v. Associated Diamond Cabs, Inc., 702 F.3d 912, 922 (11th Cir. 1983)); see also Parrish v. Premier Directional Drilling, L.P., 917 F.3d 369, 379 (5th Cir. 2019) (training and drug testing to insure compliance with OSHA safety regulations not evidence of control over the work).

Prong B addresses whether 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. See N.J.A.C. 12:11-1.4(a). The nature of an attorney's work,

including the privileged and confidential nature of communications and documents, may require that a *per diem* attorney go to the law firm to perform some of the work. Similarly, a paralegal could be required to go into the office to provide support on a matter. It could mean reviewing discovery or having a meeting with the client. While remote work may be outside of a putative employer's place of business, if an attorney or paralegal performs the assignment within the putative employer's office, that *per diem* attorney or paralegal could fail Prong B of the test.

Prong C addresses whether an individual is customarily engaged in an independently established trade, occupation, profession, or business. See N.J.A.C. 12:11-1.5(a). The factors address many examples of how an individual can demonstrate independence and in the same breath states that this – alone – does not establish independence. This is not consistent with the case law.

For example, N.J.A.C. 12:11:1-5(e)(3) specifically says that licensure in an occupation or profession, such as a nurse or an attorney, is not alone sufficient to meet Prong C. In holding that nurses were independent contractors, the Appellate Division noted that nurses "must fulfill educational and licensure requirements in order to practice their profession." Trauma Nurses, Inc. v. Board of Review, New Jersey Dept. of Labor, 242 N.J. Super. 135, 148 (App. Div. 1990). The Appellate Division further pointed out that the nurses in question were permitted to work for others as full- or part-time employees or as independent contractors and that "most" did not work exclusively through the nursing broker. Id. Contrary to the holding in Trauma Nurses, however, the Proposed Rules lists these factors disjunctively as examples of what would **not** meet Prong C, at least on their own. See N.J.A.C. 12:11-1.5(e)(1)-(3) (having multiple employers, working full-time or part-time for an entity or individual other than the putative employer, or maintaining licensure in an occupation or profession "such as a nurse or attorney"). Never mind that some of the nurses in Trauma Nurses **did** work exclusively for the nursing broker. It begs the question of what would meet Prong C?

Under the Department's interpretation of the ABC test, pool attorneys would not meet Prong C. Pool attorneys are routinely used by the State of New Jersey when the need arises, for example when there is a conflict. The Office of the Public Defender is a prime example. Many attorneys only take pool attorney work. Does their status as an independent contractor change if these attorneys only do pool work and therefore receive income from a single source - the State of New Jersey? Pool attorneys do not set their own rate of pay. They are required to undergo training with OPD. They are required to utilize the state's software program. They are required to register as a business.[1] Arguably, pool attorneys would be considered employees of the State of New Jersey under the ABC test as interpreted in these Proposed Rules.[2]

The Proposed Rules do not clearly protect defined-scope, project-based contractor relationships. Firms will be discouraged from bringing on *ad hoc* help during trial, when attempting to close a corporate transaction, or when appellate work dramatically increases, even where flexibility benefits both sides. This reduces the capacity for solo or small firms to scale up

[1] . See Pool Attorney Guidelines & Application Process, New Jersey Office of the Public Defender, Revised and Updated August 2024 here.

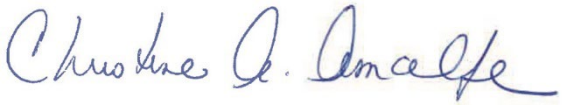
[2] Similarly, pool attorneys are used in federal court pursuant to 18 U.S.C. §3006A. Criminal Justice Act panel attorneys undergo training and have fixed fee maximums, for example.

efficiently, and limits opportunities for newer lawyers, caretakers and other professionals from seeking project work. These issues are further exacerbated when these firms retain professionals, such as investigators, bookkeepers, or paralegals, for example. Under Prong C, these professionals could unwittingly be swept in as employees. Prong C disfavors retention of professionals for *ad hoc* assignments, especially if that professional only performs work for that firm. Consider an investigator who may be a retired law enforcement officer who picks up work from time to time. If the person does not have other clients or only receives remuneration from one firm, that person could be seen as an employee. Consider a paralegal brought on by the firm to handle a large volume matter who only works as needed. Consider a retired accountant who does bookkeeping for a law firm from time to time. Prong A may be met because some or all of these examples are likely outside the normal course of business, but under Prong C, it is irrelevant if that person works part-time or full-time, for that firm or some other entity, limits the work flow to suit a personal schedule, or any number of other situations. Not every matter may require an investigator, or additional professionals, but if a law firm favors one person for this purpose this could trigger employee status under the Proposed Rules.

Solo and small firms also now become exposed to significant liability because the Proposed Rules apply not just to the Unemployment Compensation Law, but also to the Wage Payment Law, the Wage and Hour Law, the Earned Sick Leave Law, the Temporary Disability Benefits Law and the Call Center Jobs Act. This creates the risk that even a technical misclassification could expose small firms to wage claims, benefits penalties, interest, and attorneys' fees under multiple overlapping statutes, which may differ in procedural rules and enforcement mechanisms. As a result, the cost of a single audit or complaint, even if ultimately resolved in the firm's favor, could be destabilizing for a solo practice operating with already-thin profit margins.

For these reasons, the NJSBA opposes these Proposed Rules and respectfully urges the Department not to adopt them. We appreciate your consideration of these comments and welcome an opportunity to discuss any questions you may have. Please reach out to NJSBA's Assistant General Counsel of Legislative Affairs, Lisa Chapland, at lchapland@njsba.com or 732-239-3356 for further inquiries. On behalf of the NJSBA, thank you for your continued leadership.

Very truly yours,



Christine A. Amalfe, Esq.
NJSBA President

cc: Norberto A. Garcia, Esq., NJSBA President-Elect
Angela Scheck, NJSBA Executive Director

From: eagleagcy@aol.com
To: Fish, David [DOL]
Subject: [EXTERNAL] URGENT
Date: Tuesday, August 5, 2025 4:12:25 PM

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Dear Mr. Fish,
Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Dear Mr. Fish,
I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.
Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.
Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers
are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like
mine.
At the June 23 hearing, the Department acknowledged that insurance producers are still
treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.
I respectfully urge the Department to revise the proposed regulation to include specific
language stating that licensed insurance producers are exempt from the ABC Test. This
would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.
Thank you for the opportunity to comment.

This creates great difficulty for the Independent Agency, vital to our small business.
Thank you

Paul Sieranski, Agency owner for over 40 years

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From:	George Zelhof
To:	Fish, David [DOL]
Subject:	[EXTERNAL] FW: Proposed Changes to the ABC test
Date:	Tuesday, August 5, 2025 4:14:59 PM
Attachments:	scans@unitedassurance.com_20250805_164106.pdf

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Dear Mr. Fish,

Please see attached signed letter regarding the proposed worker classification rule.

Most Insurance brokers I know are independent contractors.

Thank you for allowing me to comment.

Regards,
George A. Zelhof
UnitedAssurance, Inc
Past president of the independent Insurance Agents and Brokers of Northern New Jersey
A Consolidated Insurance Agents, LLC Member
Business - Personal - Life & Health
201 West Passaic Street, Suite 201 – Rochelle Park, NJ 07662

Contact Info:
Direct Phone: 201-254-1830
Cell Phone: 201 819-8092
Direct Fax: 201-471-3635
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-----Original Message-----
From: Scan Service <scans@unitedassurance.com>
Sent: Tuesday, August 5, 2025 5:41 PM
To: George Zelhof <g.zelhof@unitedassurance.com>
Subject: Proposed Changes to the ABC test

Reply to: scans@unitedassurance.com <scans@unitedassurance.com> Device Name: Not Set

Device Model: MX-M4071
Location: Not Set

File Format: PDF MMR(G4)
Resolution: 200dpi x 200dpi

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Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Name George Zelhof
Title INSURANCE BROKER
Agency Name United ASSURANCE, INC
City, NJ 201 W PASSAIC ST
Rochelle PARK, NJ
07662

From: David Cohen
To: Fish, David [DOL]
Subject: [EXTERNAL] N.J.A.C. 12:11N.J.A.C. 12:11
Date: Tuesday, August 5, 2025 4:20:08 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.

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,

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

From: Paul Koenig Jr
To: Fish, David [DOL]
Subject: [EXTERNAL] Please Consider Exemption for Financial Professionals
Date: Tuesday, August 5, 2025 4:30:08 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,

Paul Koenig Jr
340 Hickory Ln
Haddonfield, NJ 08033
paul.koenig@ifpadvisor.com

From: Joseph Auletta
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment Regarding Proposed Worker Classification Rule (N.J.A.C. 12:11)
Date: Tuesday, August 5, 2025 4:31:58 PM

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Report Suspicious

Dear Mr. Fish,

I'm submitting this comment as a licensed insurance producer in New Jersey. I have serious concerns about how the proposed rule may impact independent agents and brokers like myself.

Under current law and longstanding practice, insurance producers are considered independent contractors—not employees—and we operate under contracts with multiple insurers to provide consumers with a wide range of options. This structure benefits clients and promotes competition.

Unfortunately, the proposed rule doesn't clearly state that licensed insurance producers are exempt from the ABC Test, which creates unnecessary confusion. Without a clear exemption in the regulation itself, insurance companies might rethink working with independent agents, which could limit consumer choice and hurt small businesses like mine.

At the June 23 hearing, the Department acknowledged that insurance producers are still treated as independent contractors. That's important, but it needs to be clearly written into the rule to avoid misunderstandings and disruption.

I respectfully urge the Department to revise the proposed regulation to include specific language stating that licensed insurance producers are exempt from the ABC Test. This would reflect existing law, maintain clarity, and help ensure the continued success of independent agents and the clients we serve.

Thank you for the opportunity to comment.

Joe Auletta, AAI
2910 Princeton Pike
Lawrenceville, NJ 08648
P)609-883-5517 Fax)609-530-0525
joe.auletta@aulettaagency.com
Remember to like us on facebook
https://www.facebook.com/Auletta-Insurance-Agency-104505802941445/about/?section=hours&tab=page_info

From:	Amy Fuller
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Advocating for youth caddies in NJ to remain as independent contractors
Date:	Tuesday, August 5, 2025 4:52:25 PM
Attachments:	WGA_ESF NJ Legislation Statement_.docx

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Hello! Please see below and attached for our thoughts on a recent legislation proposal.

We are advocating for youth caddies to remain classified as independent contractors. If this status changes, it puts in jeopardy the growth and vitality of youth caddie programs at golf and country clubs throughout New Jersey. Currently, many teens are caddying as a summer job in hopes of earning a full scholarship to college through the Evans Scholars Program. We want to ensure they have every change to still work and apply for this life-changing scholarship.

-Youth caddies' status as independent contractors provides invaluable support to New Jersey youth by allowing them to secure summer work opportunities, develop leadership skills, and earn merit- and need-based scholarships to college. This classification also gives students additional flexibility to manage their schedule and participate in extracurricular and other community leadership activities at the same time.

-Caddie programs have operated for nearly a century throughout the country in an independent contractor setting. As independent contractors, caddies receive 100% of the fees plus gratuity paid by golfers.

-This proposed rule contradicts the New Jersey legislature's — along with that of other states and federal laws — historical support for caddies being classified as independent contractors.

-The rule would drive up the cost of youth caddie programs, which would have a major negative impact on the future of youth caddie programs that support New Jersey's underserved youth.

Thank you!

Advocating for Youth Caddies To Independent Contractors in New Jersey

At the Western Golf Association/Evans Scholars Foundation, we believe that youth caddie programs change lives by preparing young people to become leaders who give back and by creating scholarship opportunities that address barriers to higher education. Youth caddies' long-time status as independent contractors, hired directly and paid by golfers, is critical to the success of youth caddie programs across the country.

In the coming weeks, the New Jersey Department of Labor and Workforce Development will vote on a proposed rule that would revise the independent contractor classification under New Jersey law. As a result, youth caddies' status would be impacted, and more transaction costs and administrative burdens would be placed on golf courses and clubs to run viable youth caddie programs. In turn, courses and clubs would likely turn to golf carts as a more convenient and affordable option.

If the proposed rule is adopted, New Jersey youth caddie programs and the opportunity to benefit from the New Jersey Golf Evans Scholarship could be jeopardized or eliminated.

WGA/ESF is proud to have strong ties to New Jersey, which we intend to continue growing and developing. The WGA will host the BMW Championship – a PGA TOUR playoff event - at Liberty National in 2027, as well as dedicate our brand new Evans Scholarship House at Rutgers University. During the 2025-2026 academic year alone, eight New Jersey youth caddies received New Jersey Golf Evans Scholarships, valued cumulatively at over $1 million. This is a life-changing scholarship provided to local student caddies with financial need, allowing them to attend college.

Sincerely,

Brian Bianchi
New Jersey resident
Vice President of Caddie Development
Western Golf Association/Evans Scholars Foundation

From: Bradford J. Lachut, Esq.
To: Fish, David [DOL]
Subject: [EXTERNAL] Proposal Number: PRN 2025-051- PIANJ comments
Date: Tuesday, August 5, 2025 5:02:55 PM
Attachments: PIANJ comments PRN 2025-051.pdf

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Good afternoon Mr. Fish,

Please find attached comments on Proposal Number: PRN 2025-051 as submitted by the Professional Insurance Agents of New Jersey, a trade association representing independent insurance agents throughout New Jersey. Thank you for the opportunity to submit comments. Please let me know if you have any questions or need any further information.

Best,

Bradford J. Lachut, Esq.
Director of Government & Industry Affairs/General Counsel
Professional Insurance Agents
25 Chamberlain St.
PO Box 997
Glenmont, NY 12077
Phone: (800) 424-4244
Fax: (888) 225-6935
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REGULATORY POSITION

PROFESSIONAL INSURANCE AGENTS OF NEW JERSEY

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LEGISLATIVE REPRESENTATIVE
Katz Government Affairs LLC

DIRECTOR OF GOVERNMENT & INDUSTRY AFFAIRS
Bradford J. Lachut, Esq.

EXECUTIVE DIRECTOR
Kelly K. Norris, CAE

Regulatory position of the Professional Insurance Agents of New Jersey Inc.

RE: **PROPOSED NEW RULES: N.J.A.C. 12:11—APPLICATION OF THE ABC TEST**

Proposal number: PRN 2025-051

Submitted to: David Fish, Executive Director, Legal and Regulatory Services, New Jersey Department of Labor and Workforce Development

I. Introduction

The Professional Insurance Agents of New Jersey Inc. respectfully submits these comments in strong opposition to the New Jersey Department of Labor and Workforce Development's proposal to adopt new rules under N.J.A.C. 12:11. Proposal number PRN-2025-051 would codify and significantly expand the Department's interpretation of the "ABC test" for determining independent contractor status under various state labor laws.

PIANJ is a trade association representing independent property and casualty insurance professionals throughout New Jersey. Our members provide individuals and businesses with expert advice, diverse coverage options, and personalized service. These professionals are not employees of insurance companies—they are licensed entrepreneurs, regulated by the New Jersey Department of Banking and Insurance, and are vital contributors to their local communities and economies.

II. Summary of concerns

While the Department's stated goal is to clarify worker classification standards under New Jersey law, the proposed regulation, as drafted, poses a serious threat to the independent insurance agency system, which has successfully served Garden State consumers for more than a century.

Specifically, the proposed rule would:

- undermine long-standing industry practices;
- ignore statutory exemptions for insurance producers under the Unemployment Compensation Law (N.J.S.A. 43:21-19(i)(7)(J));
- impose an overly rigid and expansive ABC test that many legitimate independent insurance agents could not meet;

- continued -

- misinterpret regulatory oversight as evidence of "employer control" under Prong A;
- blur the distinction between carrier and producer functions under Prong B, endangering longstanding distribution arrangements; and
- diminish the significance of licensing, business formation, and client diversification under Prong C—placing an unreasonable burden on regulated professionals to prove their independence.

III. The role of independent contractor status in the independent insurance agency system

New Jersey's independent agency system is a cornerstone of consumer access and choice in the insurance marketplace. Licensed by the DOBI, independent agents are free to represent multiple insurance carriers, allowing them to tailor coverage recommendations to each client's specific needs, rather than being limited to a single insurer's offerings.

This model is made possible by the independent contractor status of producers. As self-employed professionals, these agents manage their own businesses, engage with clients directly, and choose how best to serve their communities. This autonomy results in competitive pricing, a broad array of product options, and personalized, unbiased advice—benefits that are passed directly to consumers.

Producers also have the flexibility to pursue additional licensure—such as licenses for financial or retirement products—allowing them to provide comprehensive service across multiple lines of business. Many choose independence precisely because it enables them to serve a wider range of clients with more agility and choice than would be possible in a traditional employment relationship.

Undermining this structure by imposing a misaligned employment classification standard would severely disrupt the availability and affordability of insurance products in New Jersey. It would likely shift the market toward a captive-agent model—narrowing consumer options, weakening competition, and diminishing the locally driven service that defines the independent agency system.

Maintaining the independent contractor status of licensed producers is not simply a workforce issue; it is essential to preserving a delivery system that has long protected New Jersey consumers through competition, accessibility, and trusted local relationships.

- continued -

IV. Legal and historical context

Since 1941, New Jersey law has explicitly excluded insurance agents compensated solely by commission from the definition of "employment" under the Unemployment Compensation Law. This legislative exclusion reflects a clear recognition that such professionals operate as independent contractors and are not appropriately subject to employee classification under unemployment or wage statutes.

As noted in the original sponsor's statement:

"... such agents are independent contractors and the commissions earned by them can form no practical basis for the ultimate payment of benefits to them...."—N.J. Assembly Statement (1941).

Despite this long-standing statutory framework, the proposed rule fails to acknowledge or incorporate this exemption. Instead, it seeks to apply a uniform, one-size-fits-all ABC test across multiple statutes, jeopardizing the legally recognized and carefully regulated independence of insurance producers.

The Department claims general authority to apply the ABC test to a broad array of labor laws, including the Unemployment Compensation Law, the Wage Payment Law, the Wage and Hour Law, and the Earned Sick Leave Law. However, it does so without addressing the specific statutory carveouts the Legislature has enacted for industries like insurance and securities. The proposed regulation would allow administrative interpretation to override express statutory exemptions—an approach that is both legally questionable and likely to generate significant litigation and compliance uncertainty.

Indeed, federal courts have affirmed the independent status of insurance producers. In *Walfish v. Northwestern Mutual Life Insurance Co.,* the U.S. District Court concluded that an agent compensated by commission and operating under a non-exclusive appointment was an independent contractor. The court found the agent to be free from control, to perform services outside the ordinary course of the company's business, and to have maintained a separate, ongoing business. Although the case raised further questions about how the exemption applies under wage laws beyond the UCL, the factual analysis in *Walfish* strongly supports the conclusion that independent agents do not meet the definition of "employee" under the ABC test.

- continued -

While the Department's hearing officer suggested during the June 2025 public hearing that the UCL exemption would still apply, this assurance is not reflected in the text of the proposed rule. Without explicit language, producers remain exposed to inconsistent interpretations under other statutes—and left without the legal clarity their regulated status warrants.

To respect legislative intent and ensure uniform interpretation across labor laws, PIANJ urges the Department to include language in the final rule expressly recognizing that insurance producers licensed under N.J.S.A. 17:22A-26, et seq., are not subject to the ABC test. Failing that, a new rulemaking process should be undertaken with industry input to address this issue transparently and appropriately.

V. Industry-specific concerns

1. Prong A—control

The proposed rule treats regulatory oversight—such as compliance with DOBI-mandated practices—as potential evidence of employer control. For the insurance industry, such oversight is not optional; it is required by law to protect consumers. Treating compliance with regulatory obligations as indicia of employment fundamentally misunderstands the relationship between insurers, and their appointed producers, and threatens to penalize responsible adherence to DOBI rules.

2. Prong B—usual course of business

Under the proposal, any activity that generates revenue or contributes to a business's function may fall within the "usual course of business," potentially classifying independent agents as employees of insurance carriers. However, insurers and producers serve distinct roles: insurers underwrite and assume risk; agents market and distribute. Courts—including in *Walfish v. Northwestern Mutual Life*—have recognized this separation. Ignoring this distinction risks collapsing an entire distribution model into a single legal framework that was never intended to apply.

3. Prong C—independently established business

The rule significantly undermines traditional indicators of independent contractor status, such as:

- possession of a DOBI-issued producer license;
- business registration or incorporation;
- professional liability insurance; and
- a diverse and independent client base.

- continued -

By stating that these criteria are not, in themselves, sufficient to establish independence, the rule creates unreasonable and ambiguous hurdles for legitimate small businesses to prove their status—especially in industries like insurance, where such criteria are industry-standard and regulatorily mandated.

VI. Economic and consumer impact

If adopted without amendment, this rule would have far-reaching and damaging consequences, including:

- deterring insurance carriers from appointing in-state agents;
- shifting carrier relationships to out-of-state producers, weakening local service;
- forcing many New Jersey agencies out of business due to classification uncertainty;
- reducing product access, especially in underserved or inland communities; and
- undermining New Jersey's consumer protection goals and broader economic policy priorities.

VII. Recommended amendment

To preserve the integrity of the independent agency system and align with existing law, PIANJ strongly urges the Department to incorporate a clear exemption for licensed producers into the final rule. We recommend the following language:

"Notwithstanding any provision in this rule to the contrary, pursuant to a written agreement which governs the provision of services of an independent contractor, a person shall not be classified as an employee for any purpose under any law, rule, or regulation if the person is an insurance producer or insurance agent licensed by the New Jersey Department of Banking and Insurance under the "Insurance Producer Licensing Act" (C.17:22A-26, et seq.); a broker-dealer, agent, investment adviser, or investment adviser representative registered or regulated by the New Jersey Bureau of Securities pursuant to the "Uniform Securities Law (1997)," P.L.1967, c.93 (C.49:3-47, et seq.); or registered or regulated by the Securities and Exchange Commission pursuant to the provisions of the Securities Act of 1933, 15 U.S.C. s.77a, et seq.; the Securities Exchange Act of 1934, 15 U.S.C. s.78a, et seq.; the Investment Company Act of 1940, 15 U.S.C. s.80a-1, et seq.; or the Investment Advisers Act of 1940, 15 U.S.C. s.80b-1, et seq.; or if the person satisfies the requirements to be exempt from being deemed to be in an employment relationship as set forth in R.S.43:21-19(i)(7)(J) in order to be deemed an independent contractor under

- continued -

R.S.43:21-1, et seq. The person shall not be required to satisfy any other test for any other law, rule, or regulation, including, but not limited to, the tests set forth at or applied to P.L.1965, c.173 (C.34:11-4.1, et seq.) and P.L.1966, c.113 (C.34:11-56a, et seq.) to be deemed an independent contractor as provided in this section for purposes of any other law, rule, or regulation."

This amendment would:

- uphold the statutory exemption already codified under the UCL;
- avoid unnecessary disruption to a long-established, well-regulated business model;
- protect consumer access to independent advice and product choice; and
- acknowledge DOBI's primary jurisdiction over insurance professionals.

VIII. Conclusion

PIANJ supports efforts to prevent worker misclassification and protect vulnerable workers. However, this proposal—if applied indiscriminately—will harm legitimate, licensed professionals who have never been the target of misclassification concerns.

We urge the Department to:

- incorporate a clear exemption for licensed insurance producers; or
- withdraw and re-propose the rule with proper consultation and industry engagement to ensure that legitimate professional models, like the independent agency system, are not swept into an inappropriate regulatory framework.

PIANJ remains committed to working collaboratively with the Department to ensure that labor protections are advanced without jeopardizing New Jersey's insurance marketplace, consumers, or small businesses.

8/25

From:	Staci Grant
To:	Fish, David [DOL]
Cc:	"Jim Lardiere"; Chris Vanderwolk
Subject:	[EXTERNAL] DOL Proposed ABC Test Changes
Date:	Tuesday, August 5, 2025 5:14:58 PM
Attachments:	image001.png ABC Test Proposal Oppose.docx

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Report Suspicious

Mr. Fish,

Please accept our letter in opposition of the proposal in its current form. Attached is our formal letter. For any additional questions or for a discussion we would welcome, please do not hesitate to contact me directly.

Thank you,

Best regards,

Staci

NJ Legislative Committee Chair

National Association of Benefits and Insurance Professionals
New Jersey Chapter
NABIP

Direct: 973-607-8276
Mobile : 973-464-3794

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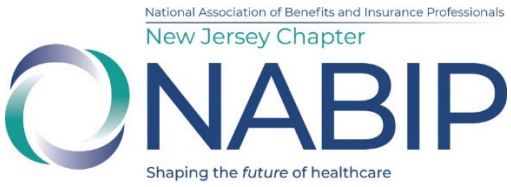

312 North Avenue, Suite 5, Cranford NJ 07016 908-349-0789 info@njahu.org

DOL Proposed Change : 57 N.J.R. 894(a)

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

NABIP Position: Opposed

To David Fish, Executive Director, Legal and Regulatory Services in the Office of the Commissioner of Labor and Workforce Development:

The NJ Association of Benefit and Insurance Professionals (NABIP) is a NJ non-profit organization made up of over 500 insurance professionals. We are a statewide consumer advocacy organization in the health and employee benefit insurance industry and other related services. NABIP members are dedicated to educating the public, individual and employer clients on critical healthcare and insurance benefit issues, among which are life insurance. Our members help employers, employees and individuals navigate the insurance markets to better understand and select the health insurance and insurance products best suited for their needs. Those members include agents, brokers, consultants, and related service providers who operate in a variety of business models – as owners of their own businesses, W-2 employees, or independent contractors paid via 1099.

We appreciate the intent of this bill as it aims to address the legitimate concerns many individuals face regarding abusive employee misclassification. However, we urge the Department to exempt licensed insurance professionals, producers, brokers, and agents from the proposed rule as we, thankfully, do not fall in a category known for misclassification.

We would encourage the Department to reconsider the proposed rule in the context of the framework within which insurance professionals operate, in lieu of "one size fits all" approach to definitions and tests that result in adverse consequences in industries outside the scope of the intended protection.

We further urge you to consider the letters of concern from Senators Johnson, Zwicker, and Lagana. Additionally, many of those serving in the Assembly, including Assembly persons Karabinchak and Stanley, have made poignant statements opposing the rule.

Thank you for your consideration of our comments. We hope you will consider re-working this proposed change, and or, including insurance professionals as an exemption.

From: Judy DiClemente
To: Fish, David [DOL]
Subject: [EXTERNAL] Opposition to Proposed New Rules: N.J.A.C. 12:11, ABC Test
Date: Tuesday, August 5, 2025 5:30:17 PM

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To: David Fish, New Jersey Department of Labor & Workforce Development
Submitted via email to: david.fish@dol.nj.gov on August 5, 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 66-year-old communications consultant (aka freelance writer/editor). The flexibility to operate as an independent contractor has afforded me the opportunity to have a “later in life” 15+ year career in healthcare investor relations – with no commute, and no one to dictate my hours or which projects and clients I choose to work on. This has enabled me the freedom to care for elderly parents, as well as children and grandchildren.

If those who hire me were forced to treat me like an “employee,” it wouldn’t suit either of us. I set my schedule around my personal and family needs and I set my compensation. It’s a win-win, as corporate needs for this type of work ebb and flow.

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.

Regards,

Judy DiClemente

16 Donlavage Way

West Orange, NJ. 07052

Judy DiClemente
jldiclemente@gmail.com

From: Brian
To: Fish, David [DOL]
Subject: [EXTERNAL] Gig Workers Classification
Date: Tuesday, August 5, 2025 5:30:57 PM

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Report Suspicious

Hi David,

My name is Brian McFarland, I live in Middlesex township.

I'm writing to express my support to classify Uber, Lyft and other gig economy workers as employees. These companies should no longer be able to avoid labor laws and mistreat their employees. I implore you to support their classification as employees.

Thank you,
Brian

From: lisay@thebistate.com
To: Fish, David [DOL]
Subject: [EXTERNAL] RE: Comments on Proposed New Rules N.J.A.C. 12:11, Proposal Number PRN 2025-051
Date: Tuesday, August 5, 2025 5:31:17 PM
Attachments: BiState Comments to NJDOL - August 2025.pdf

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Attached are the public comments submitted by the Association of Bi-State Motor Carriers on Proposed New Rules N.J.A.C. 12:11, Proposal Number PRN 2025-051.

Please confirm successful receipt of these comments ahead of the August 6th deadline.

Thank you,

Lisa Yakomin, President
Association of Bi-State Motor Carriers
551-800-7067, LisaY@thebistate.com

Association of
BI-STATE
MOTOR CARRIERS
263-D Distribution Street, Port Newark NJ 07114

August 5, 2025

David Fish, Executive Director, Legal and Regulatory Services
Department of Labor and Workforce Development
PO Box 110, 13th Floor, Trenton, NJ 08625-0110
Fax: (609) 292-8246
Email: David.Fish@dol.nj.gov

RE: Comments on Proposed New Rules N.J.A.C. 12:11, Proposal Number PRN 2025-051

On behalf of the members of the intermodal trucking community at the Port of New York and New Jersey, I am writing to express strong opposition to Proposed New Rules N.J.A.C. 12:11. The Department's proposal seeks to permanently impose a highly subjective, overly restrictive interpretation of the ABC test.

As the President of the Association of Bi-State Motor Carriers, I represent trucking companies that move freight through The Port of NY & NJ, the busiest port on the East Coast—a distinction that's now in jeopardy because of these proposed rules. Depending on the time of year, up to 77% of our driver workforce is composed of self-employed owner-operators, and regulations seek to unfairly limit or even eliminate independent contractors would spell disaster for our port.

I urge the New Jersey Department of Labor to **rescind this proposal in its entirety.** Proceeding down this regulatory path will not only hurt the intermodal trucking sector in New Jersey, it will paralyze the regional supply chain, unleashing far-reaching consequences on the financial well-being, health and safety of residents in the State of New Jersey and beyond.

Previous attempts to enshrine the Labor Department's narrow application of the ABC test have been soundly rejected by the state legislature. This new rulemaking, spearheaded by the appointed Labor Commissioner, ignores that opposition and bypasses the authority of our state's elected legislative representatives. More than a dozen state legislators have publicly expressed bi-partisan concerns, including a warning that the proposal "departs from existing statute and case law controlling worker classification." Labor law attorneys also concluded that this proposal would eliminate the ability for New Jerseyans to work as independent contractors.

FUNDAMENTAL OBJECTIONS TO THE PROPOSED RULES

One thing I want to make perfectly clear on behalf of the motor carriers I represent: We do not in any way condone worker misclassification, and we support enforcement and accountability for businesses that act in bad faith to commit wage theft.

Our primary issue with the proposed rules is that they purportedly aim to protect workers against misclassification, but in reality, they forcibly *misclassify* legitimately self-employed individuals against their will, causing irreparable harm to the livelihoods of an estimated 1.7 million New Jerseyans.

The New Jersey Department of Labor's current policies center on an archaic ABC classification test that has been proven to eliminate jobs. The evaluation criteria used by the NJDOL and the arbitrary manner in which they are applied has resulted in confusion and a lack of clarity, allowing for an unlimited number of unspecified factors to determine employee status. This makes it nearly impossible for business owners who work with independent contractors to know with any certainty if they are in compliance, as they are forced to navigate a labyrinth of subjectivity created by these rules. The narrow application of the ABC test adopted by the current Labor Department does not allow for the existence of properly classified independent contractors, particularly as it pertains to the trucking industry. Relying heavily on a standard that harks back to the 1930s, New Jersey's labor law has not kept pace with the needs of modern-day workers.

The rule proposal is also unreasonable and dangerous, especially the assertion under the A prong that merely expecting a worker to comply with *any* law indicates an employer/employee relationship. Expecting someone to be a law-abiding citizen isn't control—it's common-sense. This illogical application of the A-prong would disincentivize compliance with basic laws and safety regulations that serve the common good, such as wearing a seatbelt or stopping for red lights, putting all New Jerseyans at risk.

The timing of this proposal is ill-advised: With just a few months left in Governor Murphy's tenure, this eleventh-hour attempt to codify the Labor Department's unreasonable, widely contested application of labor law appears arbitrary and capricious. These changes will only lead to more uncertainty for independent contractors and the businesses that work with them, regardless of who assumes control of the Governor's office in 2026. The incoming Administration's perspective may not align with this new rulemaking, leading to "policy whiplash" for New Jersey's independent contractors.

The proposal also fails to account for important changes happening on the federal level, where several key legislative proposals are receiving action in Congress and stand poised to impact independent contractors nationwide. Now is not the time for New Jersey to implement unnecessary rule updates that would conflict with Federal law and inevitably lead to protracted legal battles that could prove expensive for our state.

In addition to these fundamental objections, there is much to be concerned about with the proposed new rules, starting with the Misclassification Task Force Report upon which the Labor Department's policies have been based under Governor Murphy.

THE NJ MISCLASSIFICATION TASK FORCE REPORT

The New Jersey Department of Labor has made no secret of the fact that the 2019 Report of Governor Murphy's Task Force on Employee Misclassification was used as the basis for labor and misclassification policy reforms enacted under this Administration.

Unfortunately, that's where the transparency stops.

The report does not contain specific details of who the members of Governor Murphy's Misclassification Task Force were, nor does it indicate who authored the Report. It lists the participants in generic terms: three unnamed representatives from the Labor Department, three from the Treasury Department, and one each from the Department of Law and Public Safety, the Department of Agriculture, the Department of Banking and Insurance, the Department of Human Services, the Department of Transportation, and the Economic Development Authority. The independent contractors and businesses in New Jersey that have been most deeply impacted by the report and its recommendations deserve to know exactly who took part in the Task Force, as it is the foundation upon which the Murphy Administration's labor policies have been built.

According to a May 7, 2021 press release from the New Jersey Treasury Department boasting of new misclassification policies, "Treasury had robust representation on the Governor's Task Force, established in May 2018 through Executive Order No. 25, with participating members from its divisions of Taxation, Purchase and Property, Revenue and Enterprise Services, and Property Management and Construction."

This robust representation by Treasury staffers who do not have direct knowledge of the motivations of the independent contractor workforce may well explain why so much of the 2019 Task Force report gets it wrong. It also begs the question: Was the Task Force truly focused on protecting workers, or was it influenced by the need to generate revenues for the cash-strapped State of New Jersey?

The press release from the Treasury repeats statistics from the 2019 Misclassification Task Force report that were grossly misinterpreted by someone who perhaps doesn't understand how to read and interpret data correctly, or worse, who purposely misrepresented the data to justify a preferred narrative that was not otherwise provable.

The release perpetuates the easily debunked claim that misclassification "has increased by approximately 40 percent in the last 10 years" (i.e. 2011-2021). This statement stems from an inaccurate citation culled from the 2019 Task Force report that made the same erroneous claim about the years 2009-2019, based on a misconstrued data point from a study that was reported on in the Harvard Business Review. The Harvard article cited a National Bureau of Economic Research study that tracked *the pace of growth of Independent Contracting from 2005 to 2015*. This data had nothing to do with misclassification, despite repeated attempts to declare otherwise.

The Treasury Department also justified a number of 2021 policy changes based upon "a 2019 report by the Stockton University William J. Hughes Center for Public Policy," which contains citations that misconstrue data from the very same sources cited by the Task Force Report.

The release went on to make declarative statements about the amount of lost income and revenues that allegedly resulted from misclassification, which was again based upon the Hughes Center study. These figures were presented as factual, ignoring the clear warnings from that study's authors, who advised in their 2019 update: "Making an estimate of lost income taxes from workers who by their nature are difficult to track **becomes even more arbitrary than earlier estimates**. Because of that difficulty**, policy makers are urged to use caution and acknowledge the uncertainty of these estimates when citing them."** (page 12, Underground Construction Economy in NJ 2019)

Unfortunately, the New Jersey Treasury Department made no such acknowledgement in its announcement about the policies that were created and implemented based on the study's wildly arbitrary estimates. Instead, they again said that the actions taken by the Treasury Department were "based on recommendations from the Task Force's report"—a report riddled with bogus information that the New Jersey Treasury Department, by its own admission, was instrumental in creating.

That doesn't sound like an endeavor designed to protect independent contractors. It sounds like an effort to advance a pre-determined viewpoint, exaggerating the amount of misclassification.

It's also worth noting that the Hughes Center research cited by the Treasury and the Misclassification Task Force was funded by a group of New Jersey-based labor unions—the Bricklayers and Allied Craftworkers Labor Management Committee of New Jersey, the Carpenter Contractor Trust, Associated Construction Contractors of New Jersey, and Masonry Contractors of New Jersey—groups that have consistently supported policies that restrict the ability of a worker to be classified as an Independent contractor.

NO RECORDS AVAILABLE OF PUBLIC HEARINGS HELD

The Misclassification Task Force was required to hold public hearings to obtain feedback from independent contractors, but there are no publicly available transcripts or detailed documentation from any of the hearings upon which the Task Force report was based. This disturbing lack of transparency and concealment of key information gathered by Governor Murphy's Misclassification Task Force warrants further scrutiny.

According to the 2019 Misclassification Task Force Report, the Task Force held its first meeting on August 8, 2018, a second meeting on September 18, 2018, and a final meeting on January 28, 2019.

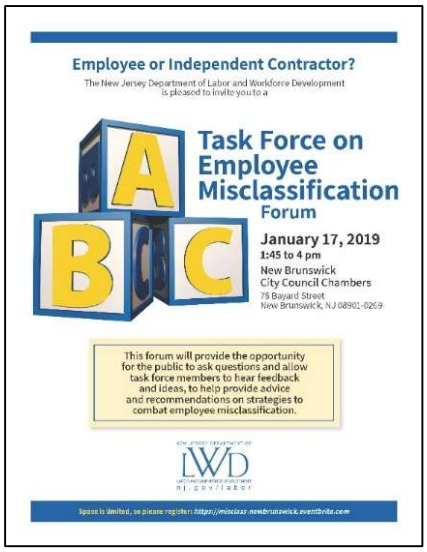
Other than the mention of these meetings in the Task Force report, I have not been able to find any publicly posted record of who attended these meetings, and no specific details about what took place. It's also not clear if advance notice of these meetings was made publicly available.

Archived calendars listing all Legislative Activity, including Hearings, Meetings, and Voting Sessions are posted at https://www.njleg.state.nj.us/legislative-calendar dating back from January 6, 1997 to present, but there are no listings advising of the dates and times of Task Force meetings on any of the calendars from that time period.

The report's omission of this information is unsettling, but the lack of transparency doesn't stop there. The Task Force report also states that "three **public** forums were held to give stakeholders an opportunity to address the issue of misclassification." According to the report, forums were held in Atlantic City (Oct. 2, 2018), Newark (December 5, 2018), and New Brunswick (January 17, 2019) "to hear from employees, employers, subject matter experts, and others affected by misclassification."

Again, it's not clear what steps were taken to inform members of the public about these forums, and how the information was disseminated to ensure diverse participation. I checked multiple issues of the Legislative Calendar archives and there are no records of any notices on the Calendars leading up to the meeting dates—no information listed on where and what time they

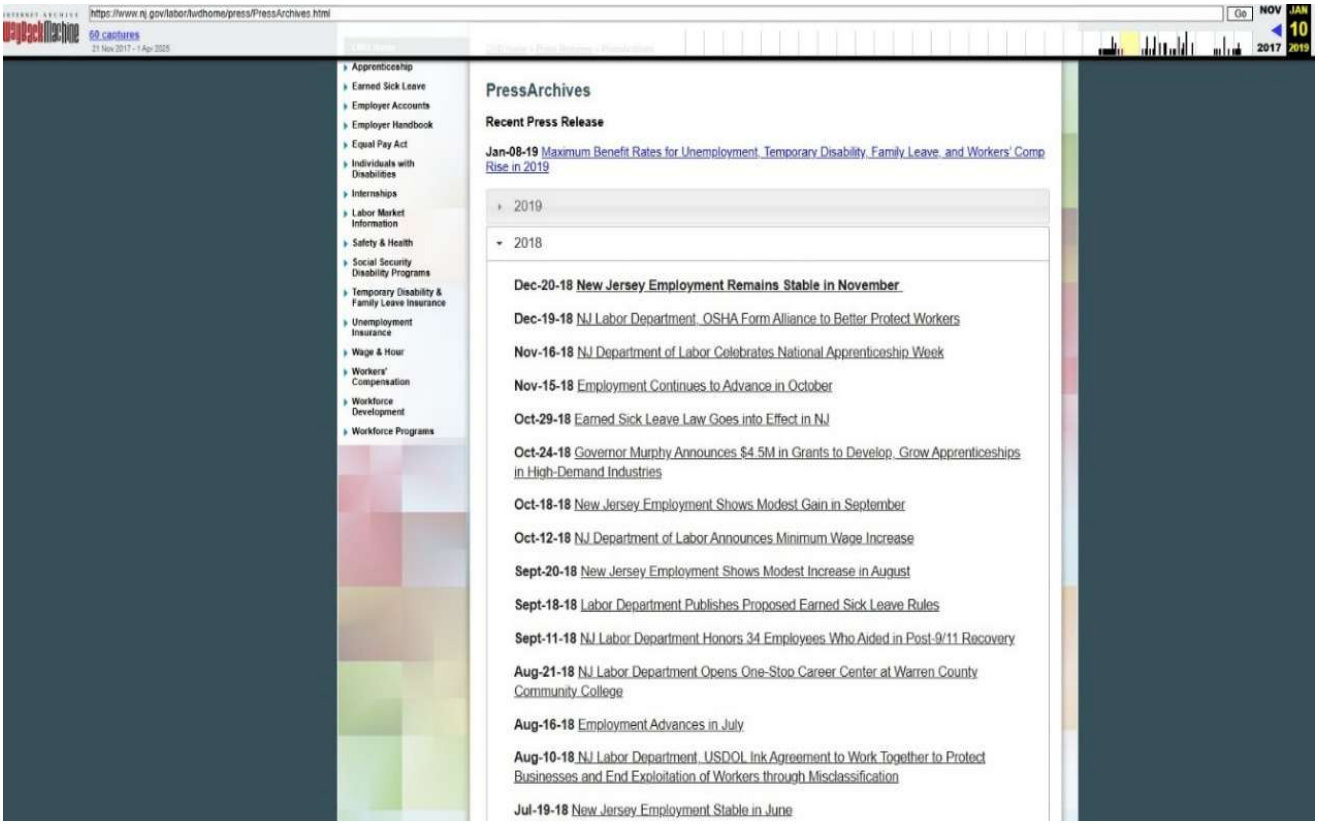
were held, or how to attend and provide input, as is typically done for public hearings of this nature.



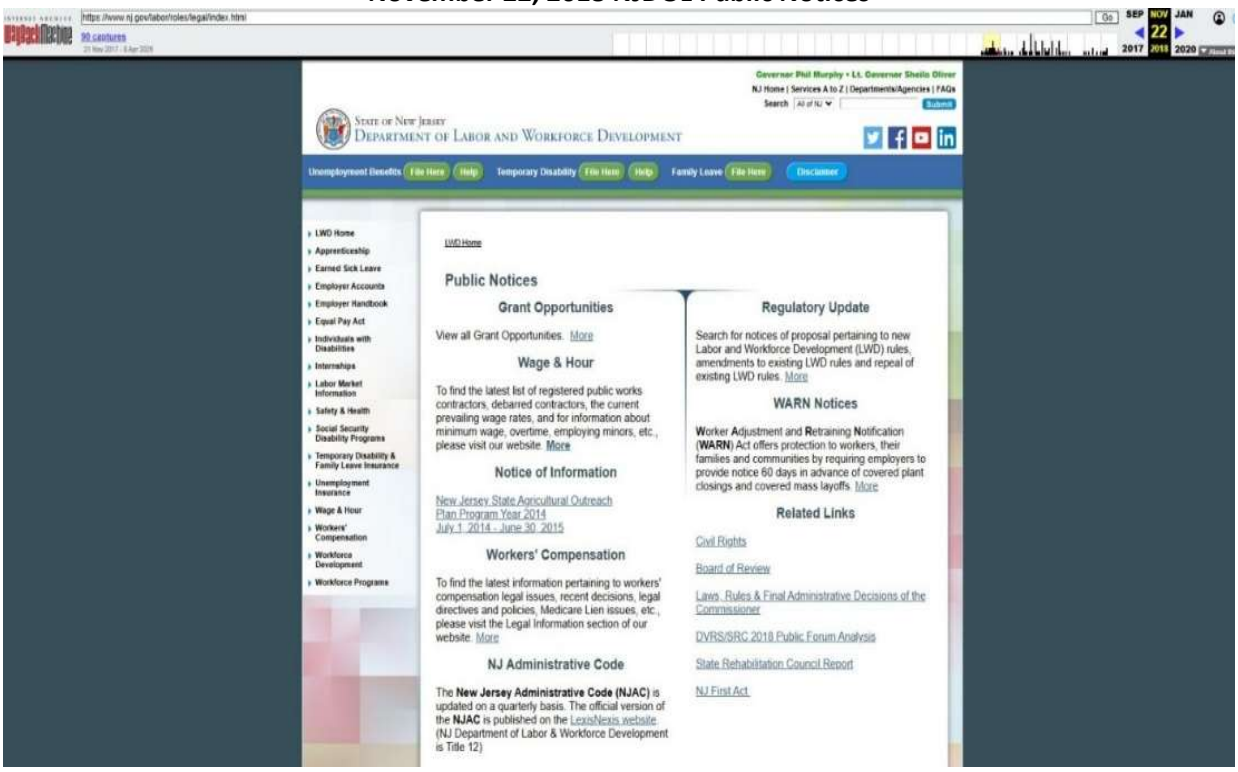
Using a search engine, I was eventually able to find flyers for two of the forums, but it is unclear how this information was distributed. The flyer for the third and final forum, which was held in the New Brunswick City Council Chambers, said "Space is limited" and, unlike other public hearings hosted by State agencies, required advance registration through a third-party, non-governmental website.

I also checked Wayback Machine, a site that archives internet webpages, to see if a public notice for these forums appeared on the New Jersey Department of Labor website. The site currently has 6,630 archived screenshots available from the Department's website, dating from March 12, 2002 to July 28,2025. I reviewed snapshots from multiple days leading up to each of the Task Force meetings and the "public forum" meetings, and found no record of any notices listed on the Labor Department's home page or under Public Notices, nor were they promoted in the Department's Press Releases archive. *(see screenshots)*

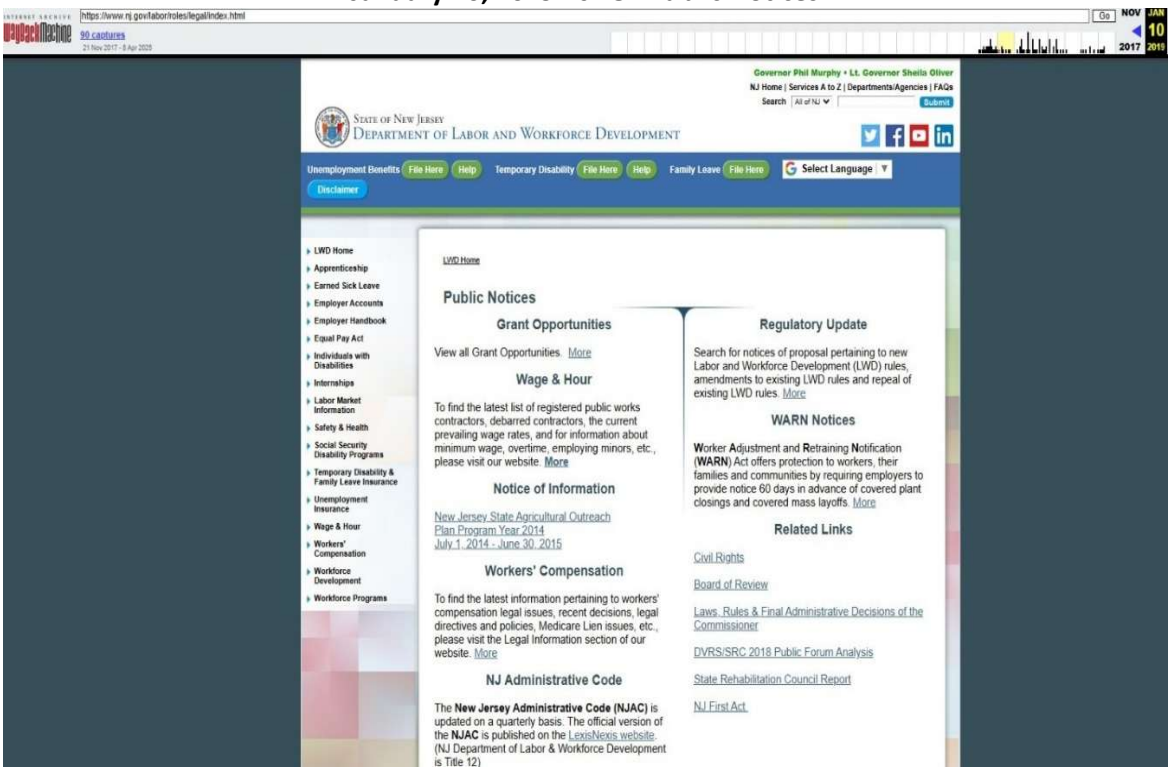
NJDOL Press Releases 2018



November 22, 2018 NJDOL Public Notices



January 10, 2019 NJDOL Public Notices



The New Jersey Legislature website also has *decades worth* of Public Hearing Transcripts archived and posted dating from 1996 through 2025, with links to transcripts and appendices from *hundreds* of Commissions and Task Force meetings. Yet the Misclassification Task Force is not listed anywhere on the pages listing meetings held in 2018 and 2019, and no transcripts are available from any of the meetings or public forums held by the Misclassification Task Force (*see screenshots from the State Legislature's website below*).

Public Hearing Transcripts 2018

Select a Hearing Year: Public Hearing Transcripts 2018

Senate and Assembly Committees

- Senate Budget and Appropriations
- Senate Education
- Senate Environment and Energy
- Senate Labor
- Senate Legislative Oversight
- Senate Law and Public Safety
- Senate Military and Veterans' Affairs
- Senate State Government, Wagering, Tourism & Historic Preservation
- Senate Transportation
- Assembly Agriculture and Natural Resources
- Assembly Education
- Assembly Environment and Solid Waste
- Assembly Housing and Community Development
- Assembly Judiciary
- Assembly Military and Veterans' Affairs
- Assembly Oversight, Reform and Federal Relations
- Assembly Science, Innovation and Technology
- Assembly Transportation and Independent Authorities

Joint Committees, Task Forces, and Councils

- Joint Committee on Economic Justice and Equal Employment Opp
- Joint State Leasing and Space Utilization Committee
- Joint Committee on the Public Schools
- New Jersey Legislative Select Oversight
- New Jersey Legislative Black Caucus
- Legislative Manufacturing Caucus
- Biotechnology Development Task Force
- Joint Legislative Task Force on Drinking Water Infrastructure

Legislative Commissions

- New Jersey Commission on Capital Budgeting and Planning
- State House Commission

Public Hearing Transcripts 2019

Select a Hearing Year: Public Hearing Transcripts 2019

Senate and Assembly Committees

- Senate Commerce
- Senate Community and Urban Affairs
- Senate Education
- Senate Economic Growth
- Senate Select Committee on Economic Growth Strategies
- Senate Environment and Energy
- Senate Law and Public Safety
- Senate Select Committee on New Jersey Transit
- Senate Transportation
- Assembly Agriculture and Natural Resources
- Assembly Commerce and Economic Development
- Assembly Education
- Assembly Environment and Solid Waste
- Assembly Homeland Security and State Preparedness
- Assembly Military and Veterans' Affairs
- Assembly Oversight, Reform and Federal Relations
- Assembly Science, Innovation and Technology
- Assembly Transportation and Independent Authorities

Joint Committees, Task Forces, and Councils

- Joint Committee on Economic Justice and Equal Employment Opp
- Joint State Leasing and Space Utilization Committee
- Joint Committee on the Public Schools
- New Jersey Legislative Select Oversight
- Legislative Manufacturing Caucus

Legislative Commissions

- New Jersey Commission on Capital Budgeting and Planning
- Disparity in State Procurement Study Commission
- State House Commission

The Misclassification Task Force report also stated that "more than 200 people attended these hearings." Of that number, the report says, "more than 40 people testified about their experiences with misclassification."

According to the American Action Forum, there are an estimated **1.7 million** Independent Contractors in the State of New Jersey. "More than 40 people" is not anything close to a representative sample of experiences and perspectives, and yet, this is amount of information the Misclassification Task Force based its statewide policy recommendations upon?

Even if every single one of the "more than 40 people" were independent contractors, that would still constitute a sample size equal to 0.0024117647--**statistically ZERO PERCENT of New Jersey's independent contractors.** We do know, based on a handful of quotes included in the report, that testimony was provided by labor union representatives and union-affiliated organizations, but the amount of independent contractor input considered by the Task Force appears to be minimal at best.

It's clear that the 2019 Misclassification Task Force did not base its conclusions and subsequent recommendations on well-informed discussions with those who stood to be impacted the most by their policies. Given these facts, the validity and relevance of the entire Task Force report must be called into question, including the recommendations which became the basis for labor policy under the Murphy Administration. The Department's failure to conduct sufficient outreach to the independent contractor community also represents a disservice to the state legislators who trusted the validity of the Task Force

Report, and voted in good faith to enact policies that, in reality, were not the product of balanced and informed discussions with their constituency.

As such, I am requesting **that all policies and laws that were enacted based on the 2019 Task Force Report be placed under immediate review by independent counsel**, preferably the U.S. Attorney, to assess the consequences and potential damage that may have resulted from a report issued under such dubious circumstances.

Recently, state legislators on both sides of the aisle have expressed concern over this rule proposal, urging the Labor Commissioner to seek out the perspective of independent contractors. Given the apparent lack of public notification, outreach, and inclusion that occurred during the Task Force's information-gathering process, these concerns are clearly well-founded.

WHO *DID* THE TASK FORCE LISTEN TO, IF NOT INDEPENDENT CONTRACTORS?

By failing to make transcripts from the hearings available to the public, the Task Force concealed who provided the testimony that informed its policy-making recommendations, making it impossible to verify the accuracy and truthfulness of the testimony provided, and whether the information put forth was based on current, factual data rather than outdated studies misinterpreted in a manner designed to exaggerate the prevalence of misclassification in our state.

The Task Force's characterization that these hearings were all "public" is also incorrect. The Task Force Report states "the first hearing was held at the Interstate Labor and Standards Association (ILSA) Conference in Atlantic City," where discussion was focused "primarily in the construction industry."

In fact, **attendance at this conference was *not* free and open to the public**, but rather, it was a ticketed event where **the price of admission was $225 per person, not including a hotel room fee of $79 per night** (plus tax and fees, *see below*). According to the flyer promoting the conference, "The anticipated attendees at the conference will be representatives from the construction industry, government agencies, reinvestment authorities, school construction facilities and economic development agencies." No mention of the inclusion of independent contractors.

ILSA Interstate Labor Standards Association

INTERSTATE LABOR STANDARDS ASSOCIATION

July 9, 2018

Dear Sir or Madam:

The New Jersey Department of Labor and Workforce Development's Division of Wage and Hour Compliance, in conjunction with the Interstate Labor Standards Association (ILSA) is hosting the Atlantic Great Lakes Region, Prevailing Wage, Public Works Contractor Registration and Misclassification Conference at Caesars, Atlantic City, New Jersey starting Tuesday evening, October 2, 2018 thru Thursday, October 4, 2018.

This conference will explore a number of questions involving the Prevailing Wage Act, Contractor Registration Act, Davis-Bacon Act, Misclassification of Workers Act, newly enacted laws and regulations, and the enforcement activities conducted by neighboring states as well as the United States Department of Labor with respect to creating an equal playing field and bidding process for public work. In addition, there is an opportunity to meet and listen to those in the construction industry, where the Prevailing Wage Act, and Contractor Registration Act, and Misclassification of Worker Act directly affect their operation.

The anticipated attendees at the conference will be representatives from the construction industry, government agencies, reinvestment authorities, school construction facilities and economic development agencies.

The cost of the conference will be $225.00 which will include food, refreshments and informational material. Registration should be completed by September 5, 2018. If you have any questions, please call Ruth-Jessica Rosado at (609) 633-6294, fax (609) 695-1612 or email at: ilsa@dol.nj.gov.

Make checks payable to ILSA (Interstate Labor Standards Association)

For room reservations, please call Caesars at 1-888-516-2215 no later than September 5, 2018, and indicate code **SC10LA8**. The room cost is $79.00; plus, tax and fees per night. Please note you should mention the Interstate Labor Standards Association conference to receive the discounted rate.

Please share this invitation with all members of your agency that may be interested in attending.

We look forward to seeing you at the conference.

Sincerely,

Robert E. Gaines

ILSA New Jersey Regional Representative
New Jersey Department of Labor and Workforce Development
Division of Wage and Hour Compliance
PO Box 389
Trenton, New Jersey 08625-0389

Attachment

According to the agenda for the conference (*see captures below*), speakers who presented opening remarks included Governor Phil Murphy, Labor Commissioner Robert Asaro-Angelo, and Assistant Labor Commissioner John Monahan, who all received equal billing with labor union representative William Mullen, the President of the NJ Building & Construction Trades.

The Worker Misclassification Panel (held on October 3, 2018, not October 2 as stated in the report) was composed of three Labor Department representatives who cover Wage and Hour Compliance; the panel that followed after the break included yet another labor union representative, Matthew Capece of the Carpenters and Joiners. Independent contractor representatives are not listed as participants on any of the panels, and it does not appear that any attempt was made to include their perspective in the discussions.

ILSA
Interstate Labor Standards Association

AGENDA

PREVAILING WAGE & MISCLASSIFICATION CONFERENCE
NEW JERSEY DEPARTMENT OF LABOR
AND WORKFORCE DEVELOPMENT

CAESARS, ATLANTIC CITY
OCTOBER 2, 2018 – OCTOBER 4, 2018

TUESDAY, OCTOBER 2, 2018

5:00 p.m. – 7:00 p.m.	CONFERENCE PRE-REGISTRATION

WEDNESDAY, OCTOBER 3, 2018

7:30 a.m. – 9:00 a.m.	REGISTRATION/CONTINENTAL BREAKFAST
9:00 a.m. – 9:15 a.m.	**Welcome and Pledge of Allegiance** ➢ Robert E. Gaines, Director, *NJLWD/ILSA*
9:15 a.m. – 10:15 a.m.	**OPENING REMARKS**
9:15 a.m. – 10:15 a.m.	➢ Phil Murphy, *Governor- Tenative* ➢ Robert Asaro-Angelo, *Commissioner NJLWD* ➢William Mullen, *President, NJ Building & Construction Trades* ➢ John Monahan, *Assistant Commissioner NJLWD*
10:15 a.m. – 10:30 a.m.	**MORNING BREAK**
10:30 a.m. – 11:15 a.m.	➢ Francis Chudzik, *Office of Labor Law Enforcement - Delaware Department of Labor*
11:15 a.m. – 12:30 p.m.	➢ Chief Audit Evelyn Rivera and Tom Kilgore - *Employer Accounts – Worker Misclassification*
12:30 p.m. – 1:45 p.m.	**LUNCH**
1:45 p.m. – 2:00 p.m.	➢ Frank Meyer, *Bureau Chief, NJLWD - New Jersey Asbestos Licensing*
2:00 p.m. – 2:15 p.m.	➢ Computer Presentation
2:15 p.m. – 2:30 p.m.	➢ ILSA State Updates
2:30 p.m. – 3:15 p.m.	**NJDOLWD & Worker Misclassification Panel** ➢ Barry Hickey, *Chief of Enforcement, Wage and Hour Compliance, NJLWD* ➢ David Schraeger, *Section Chief, Wage and Hour Compliance, NJLWD* ➢ Evelyn Ku, *Senior Investigator, Wage and Hour Compliance, NJLWD*
	AFTERNOON BREAK
3:15 p.m. – 4:00 p.m.	➢ Matthew Capece, Esq., *Representative. Carpenters & Joiners* ➢ Resa Spaziani, *Director, CT DOL*
4:00 p.m. – 4:15 p.m.	➢ Closing remarks – *Review of tomorrow's program* ➢ Break Out Session w/*NJDOLWD Worker Misclassification Staff*

As with the other meetings hosted by the Misclassification Task Force, there is no transcript available of this first "public" hearing, nor any indication that independent contractors were afforded equal opportunity to participate and provide balanced feedback at this ticketed event.

In addition to the apparent lack of balance on the panels, the fees required to participate in this hearing represent a barrier to entry for economically disadvantaged New Jerseyans who would have otherwise wanted to participate in the dialogue on this issue. This also contradicts Governor Murphy's own Executive Order No. 25, which stated that his intention in establishing the Task Force was to "promote fairness" and "fight against discrimination." Citizens should not have to pay hundreds of dollars to have their voices heard, and I urge the Labor Department to discontinue this discriminatory, exclusionary practice for any future hearings.

According to the Task Force report, "The second and third forums were held in Newark and New Brunswick, respectively, where the Task Force heard from employees, employers, subject matter experts, and other interested parties". The State of New Jersey has not released full details about who the Task Force heard from at these forums, what was shared, and how the information provided influenced the final recommendations, so the amount of participation from properly classified independent contractors—who by all accounts are the majority of independent contractors—is impossible to establish, if there was any representation at all.

GIVING INDEPENDENT CONTRACTORS A SEAT AT THE TABLE

I'm often asked, "Why is the State of New Jersey doing this to us?" Proponents of freelance busting policies that seek to strictly limit or (as is the case with the currently proposed rulemaking) outright eliminate the ability to work as an independent contractor claim the goal is to protect workers and preserve the ability to join a union--yet there is *nothing* under current New Jersey labor law stopping anyone from seeking work as an employee and joining a union if that is their choice.

If the Task Force had made an effort to seek out input from even a fraction of the 1.7 million independent contractors happily working in the State of New Jersey its members would have heard the truth: independent contractors *prefer* self-employment. Independent contractors prefer the autonomy, flexibility, and higher earning power that goes along with being one's own boss. Studies show that workers who function as independent contractors are overwhelmingly doing so of their own volition, and have no desire to become an employee.

According to the U.S. Bureau of Labor Statistics, 80% of independent contractors prefer self-employment, and less than 9% would switch to an employee job if given the opportunity. This finding is corroborated by feedback received from a recent Bi-State poll, where motor carrier companies said their owner operator drivers exhibit no desire to become company drivers, even when offered generous compensation and benefits packages and other incentives.

During my comments at the June 23, 2025 public hearing, I urged the Labor Department to listen to independent contractors, who overwhelmingly oppose these proposed rules in favor of common-sense, modern-day labor policy that allows them the freedom to choose the way they earn living. Hosting public hearings and soliciting input is meaningless if the Department of Labor intends to suppress or otherwise disregard the voices of the workers most impacted by this proposal.

LABOR UNION INVOLVEMENT IN POLICIES THAT LIMIT INDEPENDENT CONTRACTORS

As noted above, there are no transcripts or detailed information on who attended the "public hearings" hosted by Governor Murphy's Misclassification Task Force.

However, I did locate a copy of testimony that was presented to the New Jersey Misclassification Task Force in Newark on December 8, 2018 by M. Patricia Smith, senior counsel for the National Employment Law Project (NELP), a self-described "national legal, research and policy organization." Her comments cited data from in-house studies compiled by NELP, some of which is based on employment data that was gathered more than 30 years ago, when New Jersey's workforce looked very different than it does today. These NELP studies are referenced several times in the Task Force's 2019 report, and the six recommendations made by Ms. Smith in her testimony were all incorporated (in some cases, *verbatim*) into the final report.

In Ms. Smith's testimony she stated: "Transparency is important especially when the government begins new initiatives. Both the public and the state must be able to assess the success of new initiatives. In addition, transparency allows for critical review of actions taken and possible corrections or new actions if the results are not as expected."

On this specific point she and I agree, so in the interests of transparency, it's important to point out that NELP has deep ties to union labor organizations, and has been described as "working hand-in-glove on labor union legislative initiatives." In fact, NELP has received funding from the Bricklayers Union, the AFL-CIO, the Service Employees International Union, the United Auto Workers, United Steelworkers, the Carpenters Union, and the California Nurses Association—groups that have repeatedly pushed for the advancement of policies that restrict independent contractors.

Another forum participant quoted in the Task Force report is Richard Tolson, Director of the Bricklayers & Allied Crafts New Jersey (BACNJ) labor union.

Given the lack of full transparency on who else provided testimony to the Task Force, it's impossible to ascertain if the input provided at the public forums was balanced and unbiased. While there are references to "several misclassified independent contractors" providing testimony, it's unclear if the misclassification status of these contractors was confirmed by an audit or if that characterization was assumed by the Task Force itself. There's also no indication that any testimony from properly classified independent contractors—again, by all accounts, majority of independent contractors—was given any consideration by the Task Force.

According to the Task Force report, "The Task Force met a third time, in Trenton, on January 28, 2019, at which time it discussed the information gathered to date at both the public forums and prior Task Force meetings, and the recommendations stated herein." Again, no transcripts, meeting minutes, or detailed information on who attended these meetings or what was said have been made available. The Task Force report stated that "several stakeholders submitted written testimony," but copies of that written testimony have not been posted or made publicly available.

So much for transparency.

If properly classified independent contractors had been given an opportunity to share their perspectives with the Task Force, the recommendations might not have been skewed so heavily against self-employment.

When independent contractors are given the chance to speak for themselves, the conversation sounds very different.

At the Labor Department's public hearing held on June 23, 2025, the number of speakers testifying in opposition to the proposed rulemaking outnumbered its supporters by about 3 to 1. The minority who spoke in support of the rule were nearly all labor union representatives, yet two of these union-affiliated speakers (Bernard Corrigan, President of IBEW Local 102 and Eric Richard of the AFL-CIO) stated this "is not a union or non-union issue."

As someone who was raised in a proud union household (IBEW and UFT-NY), I support the rights of employees who wish to unionize, and I agree this should not be a union vs. non-union issue. Nevertheless, it's difficult to ignore the disparity of influence and involvement afforded to union representatives as it pertains to crafting labor policy in New Jersey.

In 2019, when the New Jersey Legislature attempted to pass a bill that was nearly identical to the anti-independent contractor law from California (Assembly Bill 5), the prime sponsor was then-Senate President Stephen Sweeney, general vice president of the International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers union. Other prime sponsors of legislation that has targeted industries that work with independent contractors include: Senator Troy Singleton, a member of the Northeast Regional Council of Carpenters (a regional branch of the United Brotherhood of Carpenters and Joiners of America (UBC); Assemblyman Wayne DeAngelo, the President/Business Manager for the Local 269 IBEW; and Assemblyman Anthony Verrelli, a union organizer and longtime member of the UBC.

It's understandable that these legislators take an interest in policies and legislation that advances worker protections, but that advocacy must extend to protecting the rights of *all* workers, union and non-union alike.

POTENTIAL CONSEQUENCES OF THE PROPOSED RULE

Attorneys who are experts in the field of labor law have analyzed the Labor Department's proposal, and they warn of the dire consequences that will ensue if the Department's interpretation of the ABC Test is codified.

According to attorney Richard Reibstein of Troutman Pepper Locke, the rule proposal "almost entirely eviscerates any chance for most ICs and companies using their services from establishing the workers' IC status."

Attorneys Kelly L. McNaughton and Adam Busler of Fox Rothschild's Labor and Employment Department said "the proposed regulations codify the DOL's disdain for independent contractors in the State of New Jersey."

The Mercatus Center at George Mason University studied the impact of similar rules that were enacted in other states, and found that ALL types of employment took a hit. "When states adopt an ABC test," Mercatus reported, "W-2 employment falls by 4.7%, self-employment drops by 6.4%, and overall

employment declines by 4.8% compared to states using a common-law standard." They released another study this week that demonstrated the negative impact that the ABC Test has *already* had on New Jersey: their data showed that "in New Jersey the current ABC test has already caused decreases in employment across the board:

- a 3.81% decrease in W-2 employment (contrary to the goals of New Jersey policymakers)
- a 10.08% decrease in self-employment
- a 3.95% decrease in overall employment"

Simply put: the Labor Department's proposed rule will destroy jobs and cause irreparable harm to workers, businesses, and everyone in the State of New Jersey who relies upon independent contractors.

IMPACT ON THE PORT TRUCKING INDUSTRY, SUPPLY CHAIN, AND OUR STATE'S ECONOMY

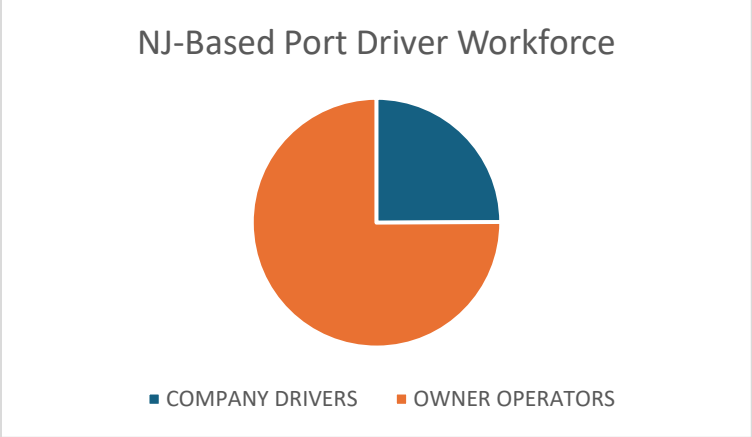
There is no question that if enacted, the proposed rule will have a devastating impact on the Intermodal Trucking Industry that serves the Port of NY & NJ, which will in turn cause widespread disruption of our region's supply chain and irreparable harm to our economy.

There are 18,508 drivers actively working at the Port of NY & NJ *(Source: April 2025 data from the Port Authority of NY & NJ, SeaLink Registration Database).* Some 12,358 of these drivers are independent owner-operators.

We cannot keep the supply chain moving with only one-third of our total driver workforce, especially given the restrictions imposed by federally mandated Hours of Service limitations.

When you consider the number of owner-operator drivers based in New Jersey, the numbers are even worse: of the 11,062 active drivers based in New Jersey as of April 2025, 75% (8,307) are owner-operator drivers working with two or more companies.

If New Jersey eliminates the ability for drayage drivers to work as independent owner operators, it will wipe out the careers of **three-quarters of the New Jersey-based truckers** who transport freight at our port.



According to the June 2023 Economic Impact Study prepared by the North Jersey Transportation Planning Authority in collaboration with the Shipping Association of New York & New Jersey, the Port Industry generates closer to $135.3 billion in business activity in our region, over $47.2 billion in personal income, and nearly $15.7 billion in federal, state and local tax revenues. The State of New Jersey receives the vast majority of those revenues: over $13 billion in federal, state and local tax revenues. These revenues would be jeopardized if the supply chain is disrupted by the Labor Department's forcible misclassification of owner-operators.

Thousands of jobs supported by the Port Industry would also be impacted, according to the 2023 study: nearly 225,000 direct jobs and close to half a million total jobs in New Jersey alone.

Put simply: the Labor Department's proposal would **cripple our trucking capacity at the port**, resulting in major supply chain disruptions. In a recent survey, New Jersey motor carriers reported that their owner-operator drivers would rather relocate or leave the industry altogether than give up the autonomy they enjoy from being self-employed. Motor carriers also said that they rarely find an owner-operator who is willing to sell their truck and transition to an employee.

To be clear, truck drivers *can* be employees *if* that's what they choose. Some companies operate exclusively with full-time employee drivers, while others work mostly with owner-operators, and the vast majority work with both.

If implemented, these rules will impede the delivery of popular consumer goods such as electronics, cars, clothing, coffee, wine and spirits, and furniture.

But that's not the worst of it.

Slashing our driver workforce to a mere fraction of what it is now will slow the transport of perishable foods to the point of spoilage, and there WILL be shortages of critical, life-saving supplies and essential components sourced from overseas, including:

- the active ingredients for over 90% of the generic medications sold in the United States;
- ingredients essential for manufacturing antibiotics, chemotherapy drugs, penicillin, blood pressure meds, and anti-depressants for treating mental illness;
- personal protective equipment, needles, syringes, surgical instruments, and diagnostic machines used in hospitals and doctor's offices that are essential for life-saving medical care;
- gluten-free grains and other specialized products for those with food-reactive health issues;
- packaging for infant formula, over-the-counter medications, cleaning supplies, personal care products, and thousands of other goods;
- critical minerals for energy technologies, aerospace, national defense tech, and battery power.

The drayage trucking community's ability to move exports will also suffer, hurting New Jersey-based businesses that support our state's economy with jobs and tax revenues, driving them away to more business-friendly states.

The consequences would also be a gut punch to consumers. The cost of transporting goods will skyrocket, and prices for everything will increase—crushing residents who are

already crying out for relief from New Jersey's high cost of living, soaring property taxes, and skyrocketing utility and insurance rates.

FEEDBACK DIRECTLY FROM THE NEW JERSEY TRUCKING COMMUNITY

When I spoke at the Department of Labor's public hearing on the proposed rule on June 23, 2025, I urged the Department to listen to New Jersey's Independent contractors and businesses owners who overwhelmingly oppose these new rules in favor of common-sense, modern-day labor policy.

Here are quotes from a recent poll of Bi-State Motor Carrier members on how the elimination of owner-operator drivers would impact their ability to move freight at the Port of NY & NJ:

If Independent Owner Operators (O/Os) are eliminated under the proposed ABC rule, the drayage capacity at the Port of NY & NJ will be devastated overnight. With up to 77% of the port trucking workforce classified as O/Os, this isn't just a labor shift—it's ***a systemic collapse in the making.***

From my 25 years of experience in logistics and drayage dispatch, I can say without hesitation that the immediate impact would be a minimum 50% reduction in available drivers. ***The ripple effects would include skyrocketing rates, freight delays, severe chassis shortages, yard congestion, and an overwhelming strain on the limited pool of company drivers****. Small and mid-sized carriers will struggle to survive, and larger carriers will not have the flexibility to absorb the volume.* ***The O/O model is not only essential for capacity—it's a backbone of the port's responsiveness and efficiency.*** *These are skilled professionals who have invested in their own equipment, know the port, and provide the agility that fixed fleets cannot replicate.*

*This rule, if passed, won't protect workers—****it will paralyze the supply chain****. We need regulatory frameworks that support safety, accountability, and fairness, but this proposal throws the baby out with the bathwater. The long-term damage to port productivity, regional commerce, and customer confidence will be irreversible.*

Very few of our owner-operators have any desire to become company drivers. Many of these owner operators have been with us for years, they like their independence and the model works for them. ***When we added company trucks none of the owner operators took those positions****, they wanted to keep their independent status.*

Even if the O/Os applied to be company drivers, there is the question of whether they can independently own their trucks or if they have to be sold to the companies. Motor carriers would also need to increase their insurance expenses along with workers comp and payroll taxes. ***The increased overhead would require higher rates to move freight in this area, making everything more expensive for consumers.***

I would have to change my entire business model if NJ eliminates Independent Contractors. The costs would be very high to purchase new equipment to keep up with the current volume of work I have. I may also lose drivers who do not want to be company drivers and will possibly leave the industry or go to a different line of work. Worst case ***if I cannot afford the initial costs of switching to company drivers I will have to close my business*** *and start a new career.*

The proposed elimination of Independent Contractors in New Jersey would severely disrupt our business model and the service we provide to over 400 customers. ***We would face significant delays, increased operational costs, and in some cases, complete service interruptions****.*
This rule does not reflect the realities of our industry. It punishes the very entrepreneurs who chose the O/O model for its freedom and earning potential. ***The consequences would not only cripple small and mid-sized drayage providers like us but also ripple across warehouses, retailers, and ultimately consumers.***

WHY DO SO MANY OWNER-OPERATORS DO PORT WORK?

Drayage trucking attracts a higher-than-average percentage of owner-operator drivers than any other sector of trucking, for several reasons:

- Freight movement involves mostly short, localized hauls (50 miles or less). This attracts truck drivers who like to remain close to home without separation from their families.

- Owner operator drivers control their own schedules and set their own rates, which affords them higher earning potential than company drivers.

- Freight volumes fluctuate throughout the year depending on retail requirements, and are also impacted by uncertainties caused by weather and traffic conditions. As such, our nation's ports require a workforce that can expand and contract to meet those ever-changing needs. Owner operators provide the resilience that is necessary to meet the ebbs and flows of freight volumes without layoffs.

- Having a "busy season" and a "slow season" offers drivers an opportunity to have higher earnings for several months of the year, followed by periods of time off to visit family, travel, or take on other work.

- The earning potential is significantly higher for owner-operator truckers. Figures provided by a sampling of motor carriers in the New Jersey drayage industry indicate compensation ranging from $155,000 to $262,000 for individual owner-operators, and income ranging from $380,000 to $448,000 for those who operate more than one truck. According to the U.S. Bureau of Labor Statistics, the average income for employee drayage drivers is between $45,000 and $60,000 per year. Owner operator truckers tend to be older men and military veterans. Due to their close involvement with the day-to-day operation of their companies, owner-operators are statistically safer drivers than company drivers and can earn salaries that are up to 10 times greater than that of company drivers working for private fleets. *Source: CloudTrucks*

BI-PARTISAN CONCERNS AND CALLS TO PAUSE THE RULEMAKING

When I attended the June 23 public hearing in Trenton to express strong opposition to the Department's proposal and share the perspective of the intermodal trucking community, the room was filled to standing room only capacity, and the widespread objection to the Department of Labor's proposal was unmistakable. I sat in the front row at that hearing, listening to testimony from independent contractors, business owners, and representatives from industries that rely heavily upon independent contractors to provide essential services. One after the next, they explained in great detail just how damaging the proposed rulemaking will be to their livelihoods, and the negative consequences that will result if the

Department moves ahead with this ill-conceived policy. Not one of them condoned misclassification, nor were they trying to block anyone from becoming an employee if that is what they choose to do. In contrast, those who endorse the Department's freelance busting policies are pushing for rulemaking that would forcibly misclassify independent contractors as employees, demonstrating a blatant disregard for the devastating consequences that would result.

In the weeks since that hearing, tens of thousands of New Jerseyans have submitted letters in opposition to the rulemaking. We've also seen something truly remarkable: serious concerns expressed by state legislators on both sides of the political spectrum, urging the Department of Labor to reconsider its proposal.

Three Democratic State Senators (Johnson, Zwicker and Lagana) wrote directly to Commissioner Asaro-Angelo, expressing concerns over "the substantial negative impact that these regulations may have on the thousands of independent business owners who are properly classified." They added that "upon reviewing the rule proposal" they were "concerned it departs from the existing statute and case law controlling worker classification."

Senator Joseph Cryan, a Democrat representing Legislative District 20—where a large share of port activity occurs—submitted comments during the public hearing expressing concern over the proposal and its potential for disruptions at the Port of NY & NJ.

Senator Gopal and his district mates, Assemblywoman Donlon and Assemblywoman Peterpaul, also Democrats, requested a pause on the new rule, citing the potential to create "serious disruptions for the state's businesses and employees". They wrote that the issue "warrants further study" and urged the NJDOL to conduct "a formal economic impact analysis."

I concur with their request for a study to be done of the potential economic impact, and urge the Department to ensure that the process of compiling such a study be open and transparent, using real data rather than arbitrary estimates, and have copies of the study posted publicly once completed.

Another excellent request that I endorse wholeheartedly is the suggestion put forth by the District 18 Legislators—Senator Patrick Diegnan Jr., Assemblyman Karabinchak and Assemblyman Stanley—who urged the Labor Department to not only pause the rulemaking, but also to 'open the door for more inclusive stakeholder engagement."

The opposition to the rule proposal is not limited to Democratic lawmakers—it is a bi-partisan effort. The Republican legislative team in District 24—Senator Space, Assemblywoman Fantasia and Assemblyman Inganamort—urged Commissioner Asaro-Angelo to withdraw the proposal "in its entirety," pointing out that "this regulatory action represents a clear attempt to bypass the legislature, given that similar legislation has repeatedly failed to advance due to widespread opposition."

Republican Senator O'Scanlon and his district mates, Assemblyman Scharfenberger and Assemblywoman Flynn released statements criticizing the proposal, saying it "will only serve to make New Jersey more unaffordable for hardworking residents" and cautioning that "the proposed rule changes would be disastrous for anyone currently working as an independent

contractor" and "these rules punish workers who choose independence." They called on Governor Murphy to "step in and stop this overreach now."

Senator Amato, Assemblyman Rumpf and Assemblyman Myhre relayed concerns from dozens of their constituents that "the proposed new rules stand to threaten the livelihoods of thousands of people across the state."

Senator Angela McKnight, a Democrat representing Jersey City and Bayonne--locations that are crucial hubs of supply chain activity—warned that "the proposed changes risk harming independent contractors and the industries they seek to help. The proposed rule is overly broad and appears likely to reclassify a large number of independent contractors as employees." She also warned of the potential for "serious unintended economic consequences, especially in sectors like transportation" that could lead to "supply chain issues, empty shelves, and higher consumer costs."

Additional letters from both Democratic and Republican lawmakers are expected to be filed before the August 6th deadline. I urge you to heed the concerns expressed by our elected representatives, and abandon the proposed rulemaking to allow for further analysis on this complex issue that includes engagement with all stakeholders.

FINAL RECOMMENDATIONS

- The Murphy Administration and the Department of Labor should heed the impassioned warnings from the legislators who have come together across party lines to unite on this issue. The Administration and the Department should also thoughtfully consider the comment letters from workers and industries who will be directly impacted by the proposal, and not allow special interest groups to dismantle self-employment rights in New Jersey.

- Please LISTEN to the independent contractors who overwhelmingly oppose these proposed new rules in favor of common-sense, modern-day labor policy.

- New Jersey must take a step back from the deeply flawed 2019 Misclassification Task Force report, acknowledge its failures, and re-evaluate the policies that were enacted based upon misconstrued data and insufficient input from New Jersey's independent contractor workforce.

- Legislators from District 18, which include the Chairman of the Senate Transportation Committee, called for "more inclusive stakeholder engagement." I believe the best way to achieve this is to establish an all-new **Task Force on Independent Work** that is composed of participants who are actively working as independent contractors, along with stakeholders from industries in New Jersey that work most frequently with Independent Contractors. The new Task Force on Independent Work should convene multiple public hearings that are truly open and accessible to members of the community across the State of New Jersey. These meetings must be conducted in a transparent manner, with a livestream option for those who wish to attend the meeting remotely, in order to ensure that the Task Force bases its report and recommendations on a significant and a wide-ranging amount of perspectives. All transcripts and materials relevant to the Task Force and any subsequent report issued must be archived and available for public review.

- Rescind the current rulemaking proposal, and freeze any further regulations and legislation that could harm independent contractors.

I urge the New Jersey Department of Labor to welcome Independent Contractors into the conversation, current research from unbiased sources that truly reflects the modern-day workforce, and stop relying on outdated data from a by-gone era funded by special interest groups. The needs of New Jersey's workforce have evolved, and our state's labor policy must keep pace.

Federal efforts are already underway to achieve a more modern classification standard that truly protects the rights of all workers through the Modern Worker Empowerment Act, whose framework New Jersey would do well to emulate.

As you review the comments submitted on Proposed New Rules N.J.A.C. 12:11, please thoughtfully consider the feedback you receive from New Jersey's independent contractors and the businesses that rely upon them. New Jersey's approach to labor policy has excluded and disregarded these voices for far too long. It's time to give independent contractors and the industries that rely upon them a seat at the table in a way that is meaningful, inclusive, and weighted properly, given that the vast majority of independent contractors desperately want to retain their autonomy and the fundamental right to choose self-employment.

On behalf of the intermodal trucking community, I welcome the opportunity to work collaboratively with the Department of Labor to craft labor policies that preserve worker choice and protect our fragile supply chain while ensuring the health, safety, and economic well-being of all New Jerseyans.

Thank you,

Lisa Yakomin, President
Association on Bi-State Motor Carriers

The Association of Bi-State Motor Carriers is a non-profit membership organization representing the intermodal trucking industry at the Port of NY & NJ. We are based in Port Newark, New Jersey, and represent more than 200 trucking and transportation industry companies throughout the metro area. Bi-State members are responsible for transporting a majority portion of all port and container traffic at the Port of NY-NY, one of the largest and busiest ports in the nation. For more information, please visit www.bistatemotorcarriers.com

From: Sophia Difazio
To: Fish, David [DOL]
Subject: [EXTERNAL] Say NO to NJAC 12:11
Date: Tuesday, August 5, 2025 5:42:30 PM

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Report Suspicious

As a recent college graduate who has just moved back to New Jersey, I am asking you not to enact the new rules for the ABC employment test, NJAC 12:11 proposed by the Department of Labor.

With a graphic design major and a human-computer interaction minor from WashU in St. Louis, it has been challenging to find full-time employment with benefits in New Jersey or New York.

This new set of rules will make it much more difficult for people to work as independent contractors to pay the bills until full-time employment can be found. Often freelancing can lead to a job offer especially for new graduates. You must not take these opportunities away.

While full-time work with benefits like sick days is ideal for some people, many people need or want the freedom of flexibility. Eliminating flexible work will decrease the availability of work in general, if employers who can't afford to pay benefits eliminate jobs completely.

The new rules in NJAC 12:11 will create unintended consequences and will especially negatively impact creative fields where freelancing can be necessary to get a start or even start a business from scratch.

Please say no to NJAC 12:11.

Sincerely,
Sophie Difazio
Skillman, NJ

From:	Joseph Niver
To:	Fish, David [DOL]
Cc:	Lauren Herman
Subject:	[EXTERNAL] Comments in Support of Proposed New Rules: N.J.A.C. 12:11
Date:	Tuesday, August 5, 2025 5:49:22 PM
Attachments:	Laura Comment_8.5.25.pdf John Comment_8.5.25.pdf Ester Nunez Comment_8.5.25.pdf Omary Comment_8.5.25.pdf

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This message came from outside your organization.

Report Suspicious

Good Afternoon Director Fish,

Please find attached comments from workers affiliated with Make the Road New Jersey in support of the Department's rules codifying the ABC test.

Thank you,

--
Joseph S. Niver, Esq.
Staff Attorney
Make The Road New Jersey
42 Broad St.
Elizabeth, NJ 07201
908-368-1196 x 2014
www.maketheroadnj.org

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August 5, 2025

David Fish, Executive Director
Legal and Regulatory Services
NJ Department of Labor and Workforce Development
P.O. Box 110 – 13th Floor
Trenton, New Jersey 08625-0110
david.fish@dol.nj.gov

Re: Comment in Support of Proposed Rulemaking

To Whom It May Concern:

In my personal opinion, I fully agree that this regulation should be implemented for the benefit of many people who are being taken advantage of due to a lack of clear understanding of their duties, rights, and roles as employees or contractors. This regulation would be very helpful, as it's essential for individuals to clearly know the benefits available to them. If successful, it would not only provide personal well-being but also greater security and commitment. This would lead to a better working environment and I also believe it would lead to economic improvements for both sides.

Respectfully,
Laura – Elizabeth, NJ Worker

Certification

I, Joseph S. Niver, hereby certify that I am competent to translate from Spanish to English and that the above English translation of the original Spanish-Language comment is complete and faithful to the best of my ability.

August 5, 2025

David Fish, Executive Director
Legal and Regulatory Services
NJ Department of Labor and Workforce Development
P.O. Box 110 – 13th Floor
Trenton, New Jersey 08625-0110
david.fish@dol.nj.gov

Re: Comment in Support of Proposed Rulemaking

To Whom It May Concern:

I worked in an upholsterers and I was misclassified, because I worked in that business, I received wages and payroll checks as an employee of the establishment. But at the end of the year, when they prepared their taxes, the owner declared me as an independent contractor, because instead of giving me a W-2 form, he gave me a 1099 form, which is for independent contractors. I understand now that this was a violation of the law, because the owner wanted to avoid the responsibilities of paying benefits as the law requires. I think there should be more clarity in the laws that regulate and define what is an independent contractor or an employee, and they should be revised so that there are not more violations. I support the change in the law to give it more clarity. The Department of Labor must clearly define this so that more mistakes are not made. Many employers of misclassified independent contractors take advantage of loopholes in labor laws to deceive workers, especially those without a definite immigration status. I support the Department's proposed rules.

Respectfully,

John – Elizabeth, NJ worker

Certification

I, Joseph S. Niver, hereby certify that I am competent to translate from Spanish to English and that the above English translation of the original Spanish-Language comment is complete and faithful to the best of my ability.

August 5, 2025

David Fish, Executive Director
Legal and Regulatory Services
NJ Department of Labor and Workforce Development
P.O. Box 110 – 13th Floor
Trenton, New Jersey 08625-0110
david.fish@dol.nj.gov

Re: Comment in Support of Proposed Rulemaking

To Whom It May Concern:

I am writing in strong support of the proposed rule aimed at clarifying which workers are actually employees and which are independent contractors. This will have the effect of protecting so-called "gig" workers like me. These protections are not only necessary—they are overdue. While I work as an Amazon Flex last-mile delivery driver, the concerns I raise here extend to many workers across the growing gig economy who are being treated as independent contractors in name, but employees in practice.

Currently, gig workers like myself do not receive paid time off, sick leave, or vacation days. Many of us do not take days off because we simply cannot afford to. I pay for my own health insurance, vehicle maintenance, gas, and local tolls—expenses that Amazon does not cover. Even though I wear a vest labeled "Amazon" and perform deliveries on Amazon's behalf, Amazon disclaims any employer responsibilities toward me. That must change.

Our time is one of the most valuable assets Amazon exploits. We are often scheduled or assigned unrealistic delivery blocks—like being given four packages to deliver over four hours on a long, inefficient route—just to make marginal pay. These assignments result in negative returns when factoring in the personal costs of gas, wear-and-tear on my vehicle, and unpaid time. Amazon's phone app pressures us with repeated warnings about late deliveries and penalizes us if we miss them, even when uncontrollable circumstances arise—such as needing to return to get a recipient's signature.

Despite being paid at a flat rate of $22/hour, my actual earnings often fall below minimum wage after expenses. The rate once fluctuated based on time of day or demand, but now remains stagnant even during peak periods. There is no real autonomy in this job. Although Amazon claims we can work when we want, in reality, Amazon controls when and how we work. Our schedules shift constantly, and our lives are shaped around Amazon's needs—not the other way around.

The lack of basic protections like those employees would be entitled to also puts our safety and health at risk. I personally have experienced near-accidents while delivering in the early morning hours, after long and tiring shifts. If I were to get into an accident, lose my car—or worse, suffer a serious injury—Amazon would lose nothing, while I could lose everything. Gig workers deserve to qualify for medical insurance and worker protections just like anyone other employee.

August 5, 2025

Beyond the economic and physical toll, I've heard concerning stories of discrimination against Flex workers by Amazon employees. The absence of formal protections leaves us vulnerable to mistreatment with little or no recourse.

Additionally, the lack of guaranteed time off means I struggle to find time to rest, go to the doctor, or be present for my children. Amazon work is both mentally and physically exhausting, and without any structure or job security, I'm forced to juggle multiple income sources just to survive. I would much rather have a single stable job with benefits, where I don't have to constantly rearrange my entire life around a volatile, unpredictable gig schedule.

This proposed rule would give workers like me—and thousands of others—the basic protections and dignity we deserve. I urge you to adopt this rule and take a critical step toward holding companies like Amazon accountable for the misclassified labor it relies on.

Sincerely,
Ester Nuñez

August 5, 2025

David Fish, Executive Director
Legal and Regulatory Services
NJ Department of Labor and Workforce Development
P.O. Box 110 – 13th Floor
Trenton, New Jersey 08625-0110
david.fish@dol.nj.gov

Re: Comment in Support of Proposed Rulemaking

To Whom It May Concern:

I work as a delivery driver with Amazon Flex, and although the company considers me an independent contractor, in practice, it imposes many restrictions that prevent me from operating as a true independent contractor. For example, they limit me to a maximum of eight hours per day and 40 hours per week, and I cannot accept more blocks even if I have availability. Furthermore, although I accept blocks with a fixed price and duration, they don't inform me how many packages I will be delivering or the route, and I have to follow very specific instructions using their app, including taking photos, not leaving packages in plain sight, and adhering to strict delivery rules. Amazon controls many aspects of the job and offers me no benefits, even though I appear to meet the criteria to be considered an employee. I have no real freedom to negotiate terms, freely choose routes, or set my schedule as a true independent contractor would. I fully support the regulations' application of the ABC test in New Jersey, as I believe I should be classified as an employee. This would allow me access to basic labor rights such as accident protection, unemployment insurance, sick leave, and other benefits that I don't currently have access to. I appreciate that our experiences are being heard and our rights as workers are being protected.

Respectfully,
Omary – New Jersey Amazon Flex Driver

Certification

I, Joseph S. Niver, hereby certify that I am competent to translate from Spanish to English and that the above English translation of the original Spanish-Language comment is complete and faithful to the best of my ability.

From: Lauren Herman
To: Joseph Niver; Fish, David [DOL]
Subject: [EXTERNAL] Comment in Support of Proposed New Rules: N.J.A.C. 12:11
Date: Tuesday, August 5, 2025 6:30:26 PM
Attachments: 2025.8.5_MRNJ Organizational Comment in Support of DOL rule.pdf

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Dear Director Fish,

Please find attached a comment on behalf of Make the Road New Jersey in support of the Department's rules codifying the ABC test. Please let us know if there are any questions or if there is any further support we can provide.

Thank you very much.

Respectfully,
Lauren

--
Lauren W. Herman, Esq.
Legal Director
Make the Road New Jersey
42 Broad St.
Elizabeth, NJ 07201
phone: (908) 368-1196 ext. 2002
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August 5, 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:

Make the Road New Jersey ("MRNJ") supports the proposed regulation by the New Jersey Department of Labor and Workforce Development ("Department") codifying its interpretation of the state's long-standing statutory "ABC test."

With offices in Elizabeth, Passaic, and Perth Amboy, Make the Road New Jersey builds the power of immigrant, working-class & Latinx communities to achieve dignity and respect through community organizing, high-quality legal services, policy innovation and transformative education. Many of our approximately 6,000 members throughout New Jersey are directly affected by this rule.

MRNJ has extensive experience working alongside gig-workers like ridehail drivers, food delivery app workers, and package delivery workers like Amazon Flex drivers. Additionally, we have experience working with other misclassified employees in construction, logistics, janitorial services, and other industries including those who use temp staffing agencies.

MRNJ sees misclassification as central to the perpetual exploitation of its members and workers across New Jersey—particularly in sectors where people of color and immigrants make up large portions of the workforce. Often misclassified as independent contractors, the growing pool of app-based workers is disproportionately people of color.[1] While Black and Latinx workers comprise about 29% of the U.S. workforce, they are 42% of workers for Uber, Lyft, and other digital labor platforms.[2] Workforce Misclassification is but another tool used to extract excess

[1] U.S. Bureau of Labor Statistics, "Electronically Mediated Work: New Questions in the Contingent Workers Supplement," *Monthly Labor Review*. (Sept. 2018), https://www.bls.gov/opub/mlr/2018/article/electronically-mediated-work-new-questions-in-the-contingent-worker-supplement.htm

[2] National Employment Law Project, "New Report Reveals App-Based Workers' Anxieties, Frustrations, and Desire for Good Jobs." (Oct. 2021), https://www.nelp.org/new-report-reveals-app-based-workers-anxieties-frustrations-and-desire-for-good-jobs/

profits off the backs of workers in a time when the annual transfer of wealth from the bottom 90% of Americans to the top 10% is nearly $2 trillion per year.[3]

MRNJ has been a regular advocate at the New Jersey state legislature to pass stronger protections for all workers. We also recognize the crucial role that agency rulemaking plays in ensuring strong implementation of the legislature's duly enacted laws. As a result, we know a good rule when we see one, and the clarity provided by the Department in this proposed rule to codify the ABC test is just that: clear, concise, and crafted to stamp out any confusion on who is and who is not an independent contractor.

Because the proposed rule will help deter misclassification of employees and for the reasons detailed more fully below, MRNJ wholly supports the Department's proposal.

Flexibility and Freedom for Whom?

Companies may claim that the proposed rule poses an existential threat to the foundation of their business models and to so-called "worker freedoms," but such concerns are overstated.

First, as the National Employment Law Project (NELP) notes: "True flexibility comes with employee benefits like paid time off—for example, paid family leave, sick time, and vacation. These benefits allow workers to balance work and family responsibilities without foregoing pay or putting in overtime."[4]

Our members know true flexibility does not mean scrambling to accept a food order or ride opportunity during every fleeting moment of free time just to make ends meet. True flexibility means having the choice to step away from work to care for yourself or your family without losing income or stability. True flexibility treats workers as whole people with lives, responsibilities, and needs outside the job—and that comes with the protections and benefits of being an employee.

Second, The ABC test at the heart of the proposed rule, as the Department has recognized, draws from the legal framework utilized by New Jersey since 1936, reflecting principles that have governed employment classification for nearly a century.[5] During that time, companies across industries have grown, thrived, and built successful and expansive operations in New Jersey while operating under the ABC test framework. The notion that a clarification of this long-established standard now poses an existential threat to the country's most powerful corporations simply does not hold up against that history. What the rule does is confront a business strategy

---

[3] Carter C. Price, "Measuring the Income Gap from 1975 to 2023," RAND Corporation (Feb. 2025). https://www.rand.org/pubs/working_papers/WRA516-2.html; Bernie Sanders U.S. Senator for Vermont, "NEW STUDY: Nearly $80 Trillion Redistributed from the Bottom 90% to the Top 1% Since 1975," (Mar. 2025). https://www.sanders.senate.gov/press-releases/new-study-nearly-80-trillion-redistributed-from-the-bottom-90-to-the-top-1-since-1975/

[4] Mayo Pinto et. al, "Rights at RIsk: Gig Companies' Campaign to Upend Employment as We Know It," National Employment Law Project, (Mar. 2019). https://www.nelp.org/insights-research/rights-at-risk-gig-companies-campaign-to-upend-employment-as-we-know-it/

[5] "Acts of the One Hundred and Sixty-First Legislature of the State of New Jersey and Ninety-third Under the New Constitution," 1937

that relies on skirting responsibility for workers—something the law was never intended to permit and which has been tacitly tolerated for too long.

Regulations without clarity can make it difficult for companies to operate effectively. But the proposed rule provides the utmost clarity on a host of crucial New Jersey employment law regulations because it mitigates or eliminates possible confusion on independent contractor status under laws like the Unemployment Compensation Law, the Wage Payment Law, the Wage and Hour Law, and the Earned Sick Leave Law.

Furthermore, the Department's proposed rule is a clear and commendable expression of democratic governance and efficiency. In its unanimous decision in *East Bay Drywall v. Dep't of Labor & Workforce Dev.*, the New Jersey Supreme Court empowered the Department to provide clarity on the contours and application of the ABC test. With this proposed rule, the Department fulfills that call to action and its responsibility as a co-equal branch in New Jersey's government to ensure the law is applied fairly and predictably to everyone.

The Proposed Regulation Provides Helpful Clarity

A clear rule explaining the application of the ABC test's three-pronged analysis will help broaden the knowledge base and better ensure that the proper analysis is understood by all impacted stakeholders.

Prong A of the ABC test examines whether a worker has been and will continue to be free from control or direction over the performance of services: it looks at both facts on the ground and to whether a putative employer has reserved the right to control the worker's performance. This is important because true independent contractors run their own businesses and are "free" from control by the customer or entity that engages them. They have the freedom to decide how and when to do their work, and they have the power to freely negotiate terms and conditions they believe will grow the business.

MRNJ members have experiences in which their work is directly or indirectly controlled by a business or a putative employer. One example is the crucial work misclassified workers perform for Amazon, the Washington-based mega-corporation set to become the largest retailer in the country,[6] in its growing army of on-demand, independent contractor Flex drivers. Flex drivers perform the company's last-mile delivery—a crucial final step in getting goods from fulfillment centers to consumers' doorsteps. Though Amazon requires workers to have their own vehicles, smartphones, and car insurance, the company exercises immense direct and indirect control over its misclassified Flex driver employees.

Prong A would help to usher in a baseline of expectations that is sorely lacking for Flex drivers and other misclassified workers across New Jersey. Currently, Amazon's misclassification of Flex drivers as independent contractors allows the company to steal wages in multiple ways, thus causing workers to spend more time on the Amazon Flex application looking for work while Amazon reaps the benefits in the form of valuable data and metrics. The website landing page

[6] Sarrah Nassauer, "Walmart's Reign as America's Biggest Retailer is Under Threat," *Wall Street Journal*, May 15, 2024, https://tinyurl.com/3h93j35p

for the Flex program says drivers can expect to earn $18 to $25 per hour, but the finer print on its "FAQ" page clarifies that Amazon will pay workers $15 to $19 per scheduled hour.[7] The expected earnings are calculated without regard to gas, tolls, vehicle maintenance, and insurance expenses—all of which have gotten more expensive since the Flex driver pay rates were set in 2018.[8]

One Flex driver in New Jersey said out of 24 hours of the day, she spends 16 hours just looking for a delivery block on the Amazon Flex application.[9] This unpaid time on the clock, looking for work to pay the bills in this gig economy, would be compensable under local, state, and federal wage and hour laws. All told, a 2018 study by financial analysts at AllianceBernstein found that average Flex hourly earnings were just $5.30 after expenses.[10] And if Amazon Flex workers were true independent contractors, not only would they see theft of their wages decrease but they would enjoy a position where negotiating pay is not impossible. "I know friends who are actual contractors, and when they have to do more work, they get paid more—they change their rates. We have no negotiating power. So, misclassification is wage theft," said Patricia Hearons, a Flex driver and member of the Philadelphia Drivers' Union, at a 2021 Pennsylvania State Senate hearing on independent contractor misclassification.[11]

Prong A of the ABC test mitigates the potential for confusion and harmful misclassification and clarifies the contours of employee classification vs. true independent contractors for businesses and employees.

Prong B of the ABC test is flexible, allowing the putative employer to meet the standard if *either* the worker's service is outside the usual course of the putative employer's business, *or* the worker's services are performed outside of all the places of business of the putative employer's business enterprise.

Prong B serves as a check on unlimited outsourcing to misclassified workers, with a common sense recognition of the fact that workers performing the very same work or services that a business markets to its client community are generally working *for* that business. It provides a useful check on the ability of a business to claim that it relies on a staff of "independent contractors" each running their own businesses to perform the business's core work.

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[7] "Frequently asked questions about Amazon Flex," Amazon corporate website, accessed on July 29, 2025, at https://flex.amazon.com/faq

[8] "Average Price: Gasoline, Unleaded Regular (Cost per Gallon/3.785 liters) in U.S. city Average," St. Louis Federal Reserve Bank, U.S. Bureau of Labor Statistics via FRED, updated July 15, 2025, https://fred.stlouisfed.org/series/APU000074714; "Average annual expenditure on vehicle insurance per customer unit in the United States from 1984 to 2022," *Satista*, September 2023, https://www.statista.com/statistics/1052273/us-consumer-spending-on-vehicle-insurance/

[9] NELP author's conversation with a source, footnote 126, September 2024, https://www.nelp.org/insights-research/delivering-precarity-how-amazon-flex-harms-workers-and-what-to-do-about-it/

[10] Olivia Zaleski, "Amazon raises pay for everyone—except these workers," *Bloomberg*, November 1, 2018, https://www.bloomberg.com/news/features/2018-11-01/amazon-flex-workers-are-left-out-of-minimum-pay-raises

[11] "PA Senate Democratic Policy Committee Hearing: Worker Misclassification and the Future of Work," Pennsylvania Senate Democratic Caucus Facebook page, November 15, 2021, at 2:13:50, https://tinyurl.com/yc555bu5

The proposed regulations clarify this prong. We appreciate that the "usual course of business" looks to those activities and tasks that a putative employer regularly undertakes in order to provide or sell its services (or the goods it markets) or generate revenue.

The Department's common sense examples illustrate the point. Moreover, MRNJ members often perform tasks that would rightly be classified under the proposed rule as within the "usual course of business." Most notable are MRNJ members who work with Transportation Network Companies (TNCs) as ridehail drivers and those who work in Amazon's last-mile Flex delivery program.

Ridehail drivers repeatedly perform services that fall within the "usual course of business" because they perform the very services—providing on-demand transportation to the public—that TNCs exist to offer. TNCs like Uber and Lyft have revenue models built around connecting passengers to drivers via their platforms.

Without MRNJ members and countless other drivers to transport passengers, TNCs may struggle to operate or generate revenue. Put simply, drivers' facilitation and performing of rides is the central activity of TNCs' business models—the business that the companies market and from which they profit. Because Prong B serves as a check on unlimited outsourcing, it recognizes that performing such integral work generally means drivers are working for the business as employees.

Similarly, the service Flex drivers provide is not tangential or supplementary—it is fundamental to Amazon's identity as an online retail giant and likely plays a key role in nearly catapulting the company past Walmart to the spot of top U.S. retailer.[12] Like ridehail drivers, Flex drivers perform an integral part of Amazon's business; they are indispensable to Amazon's logistics and customer satisfaction, and are one of the most prevalent representatives of the company to the general public. Prong B of the ABC Test rightly identifies this kind of labor as employee work carried out within the usual course of the employer's business, thus calling for proper classification under the law.

The rule further explains that places of business include both the physical plants or where the putative employer conducts "an integral part of its business," —i.e., an essential part of the business. Many businesses today provide the services that they market to customers outside a physical plant and in customer homes, so it is critical to ensure that the "place of business" is not confined to outdated notions of work as occurring solely in manufacturing plants or offices.

In its proposed rule, the Department poses three notable examples of a company conducting "an integral part of its business" outside a traditional physical plant or office. Those examples are an airplane, for an airline business; a truck, for a trucking company; and a vehicle operated by a driver, whether for a limousine, taxi, TNC, or delivery service, the purpose of which is to transport people or goods. Without the Department's proposed rule and its much-needed clarifications, one could entertain the bizarre notion that an airplane is not an integral part of an airline's place of business. The same flawed logic could apply to cargo trucks or personal vehicles used to transport people and goods. While these may fall outside the traditional

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[12] *See* note 6, *supra*

definition of a "physical plant," each plays a vital role in the employer's operations, and thus must be recognized as a place of business.

Amazon's Flex program is the epitome of a scalable program that erodes labor standards and increases the power imbalance between employers and employees by eradicating worker bargaining power—this in exchange for profit increases and the ability to better shape and control legal liability. When Amazon unveiled the Flex program in 2015, two-thirds of its delivery fleet were unionized UPS drivers.[13] One year later, the independent contractor—and thus National Labor Relations Act exempt[14]—Flex drivers handled 10% of the corporation's deliveries and by just 2020, they had largely replaced the unionized UPS drivers and handled two-thirds of Amazon's last-mile deliveries.[15]

In contrast, there are examples of locations which are outside of an employer's physical plant, and do not fall under the employer's place of business because they are not places where an integral part of business is conducted. A title abstractor performing abstracting services in a public library or archive, one that does little abstracting research, is one such example. Additionally, an individual who performs remote work from their personal residence will not see their residence inherently adopted as a place of business for their employer.

In addition to clarity for those workers who should be classified as employees, Prong B of the ABC test provides the same clarity for workers who are truly independent contractors.

Prong C looks at whether a worker is truly running an independent, lasting business. The proposed rule's factors will help weed out and distinguish between sham businesses and those that are actual ongoing entities. To meet 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).

An employee typically relies on a single employer for most, if not all, of their full pay and benefits, such as health insurance, retirement contributions, paid leave, and overall job security. This dependence demonstrates that it is the power of the employer that controls what work is done and how it is done, and it is this structure, in turn, that supports employee livelihood. Additionally, employees retain core rights of which independent contractors are deprived, like protections against discrimination and harassment, the right to organize and bargain collectively, the right to a minimum wage and overtime pay, the right to paid sick leave, and more.[16] Independent contractors do not depend on a single entity for their income and operate with

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[13] Jay Greene, "Amazon's big holiday shopping advantage: An in-house shipping network swollen by pandemic fueled growth," *The Washington Post*, November 27, 2020, https://www.washingtonpost.com/technology/2020/11/27/amazon-shipping-competitive-threat/

[14] "National Labor Relations Act," U.S. National Labor Relations Board website, accessed July 29, 2025, https://www.nlrb.gov/guidance/key-reference-materials/national-labor-relations-act

[15] Ashley Cooker Prince, "Amazon cements its place as a supply chain leader amid uncertainty," *FreightWaves*, December 18, 2020, https://www.freightwaves.com/news/amazon-cements-its-place-as-a-supply-chain-leader-amid-uncertainty

[16] National Employment Law Project, "End Independent Contractor Misclassification," https://www.nelp.org/explore-the-issues/contracted-workers/misclassified-workers/

greater autonomy in how they perform their work. They have, as the Department's proposed rule highlights, a truly durable, strong, and viable business independent of any one employer.

The Department's Additional Principles Ensure Against Elevating Form Over Substance

Following *East Bay Drywall*, the proposed rule, especially Prong C, seeks to eliminate sham entities existing for the purpose of misclassifying employees as independent contractors. As the New Jersey Supreme Court noted in its ruling, encouraging workers to form businesses that are just paper entities for the purposes of independent contractor misclassification also undermines the public policy codified in the state's unemployment compensation law:

"A business practice that requires workers to assume the appearance of an independent business entity—a company in name only—could give rise to an inference that such a practice was intended to obscure the employer's responsibility to remit its fund contributions as mandated by the State's employee protections statutes." *East Bay Drywall*, 251 N.J. 477, 500-01.

The construction industry is an area where Prong C of the proposed rule will have positive effects for MRNJ members because it is an area "where workers may be less likely to be familiar with the public policy protections afforded by the ABC test and consequently particularly vulnerable to the manipulation of the laws intended to protect all employees." *Id.* At 501.

Misclassification robs construction workers of thousands of dollars of unpaid wages and benefits each year. A construction worker earning $31,200 per year before taxes would be left with an annual net compensation of $10,660.80 if paid as an independent contractor, according to a 2012 U.S. Department of Labor study. The study found that the same construction worker would be paid $21,885.20 per year if properly compensated as an employee.[17]

The Department's explanations provide additional clarity on Prong C of the ABC test, and we accordingly support them. The elevated cost of goods and living expenses has caused some MRNJ members, if they were not already, to begin additional employment. The Department's clarification that having multiple employers or working multiple jobs does not equate to having an independent business is reassuring to our members who work incredibly hard to put food on the table for their families and remain entitled to the benefits of employment.

The proposed rule also provides critical guardrails against the ability of putative employers to hide behind paperwork, and conversely will protect workers who lack the power or knowledge to reject an "independent contractor" label when they are not true independent contractors.

We appreciate the Department's recognition that a putative employer's decision to report earnings using a Federal IRS Form 1099 does not transform an employee into an independent contractor. Amazon, for example, foists the independent contractor label onto its Flex drivers in the Terms of Service agreement the company makes them sign, as well as, in an "independent contractor agreement" that states the Flex driver "will not be considered as having the status of

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[17] Tim Crowley, "Worker Misclassification - An Update from Constitution Ave," *U.S. Department of Labor*, (Oct. 2012). https://www.congress.gov/118/meeting/house/115679/documents/HHRG-118-ED10-20230419-SD023.pdf

an employee of Amazon for any purpose."[18] We appreciate the Department's recognition that such an "independent contractor" agreement is not dispositive of whether the ABC test is satisfied. Due to significant power imbalances between corporations, other putative employers, and individual workers, many workers feel compelled to accept contractual terms simply to secure an income for basic necessities such as food and housing. Accordingly, it is necessary and helpful to look past the agreement and examine: a) which party primarily drafted it, b) whether it was negotiated or a contract of adhesion, c) whether the putative employer can unilaterally modify it, and d) whether either party can terminate their relationship at any time during the term of the agreement.

Misclassification is a bad deal for the public good because it robs unemployment insurance and workers' compensation funds by skirting the payroll tax requirements of employment. If just 1% of workers are misclassified as independent contractors—and we know actual instances of misclassification are likely higher—this results in an annual $198 million hit to unemployment insurance trust funds.[19] This misclassification erodes the public good by reducing federal, state, and local tax withholding and revenues that New Jersey could use, for example, to invest in NJ Transit's reliability and resiliency during hot summer temperatures.

A Step Forward for New Jersey

Thank you for your leadership in providing clarity on how to determine independent contractor status under New Jersey's ABC test. We **support** the Department's proposed rule because it offers clear, consistent guidance that aligns with both the statute and court decisions, including the unanimous *East Bay Drywall* ruling by the New Jersey Supreme Court.

Adopting the Department's interpretation of the ABC test would provide much-needed clarity for law-abiding employers while standing in clear and deliberate contrast to efforts by corporate interests and lobbying groups that seek to obscure employment protections for on-demand workers and misclassify them out of material benefits. The Department's proposed rule affirms that clarity and accountability are what support a fair, functional, and strong labor market .

Sincerely,

Lauren W. Herman, Esq.
Legal Director
Make the Road New Jersey

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[18] U.S. Amazon Flex Terms of Service agreement from February 18, 2025, on file with NELP

[19] Lalith De Silva, et. al., Independent Contractors: "Prevalence and Implications for Unemployment Insurance Programs," *U.S. Department of Labor Employment and Training Administration*, (Feb. 2000). https://oui.doleta.gov/dmstree/op/op2k/op_05-00.pdf

From: William Melofchik
To: Fish, David [DOL]
Subject: [EXTERNAL] PRN 2025-051 --- ABC Test for Independent Contractors
Date: Tuesday, August 5, 2025 6:31:09 PM
Attachments: NCOIL Letter August 2025.pdf
IC Resolution.pdf

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Report Suspicious

Dear Mr. Fish -

On behalf of the National Council of Insurance Legislators (NCOIL), please accept the attached comment letter and accompanying document regarding PRN 2025-051 --- ABC Test for Independent Contractors.

Thank you,
Will Melofchik

Will Melofchik
Chief Executive Officer
National Council of Insurance Legislators
wmelofchik@ncoil.org
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TREASURER: Rep. Edmond Jordan, LA
SECRETARY: Rep. Jim Dunnigan, UT

IMMEDIATE PAST PRESIDENT:
Rep. Tom Oliverson M.D., TX

August 5, 2025

The Honorable Robert Asaro-Angelo
Commissioner
NJ Department of Labor and Workforce Development
PO Box 110
Trenton, NJ, 08625

RE: PRN 2025-051 – ABC Test for Independent Contractors

Dear Commissioner Asaro-Angelo:

Please accept this comment regarding PRN 2025-051 on behalf of the National Council of Insurance Legislators (NCOIL). In 2022, NCOIL adopted the enclosed Resolution, which supports independent contractor status for insurance agents and other licensed professionals, and opposes the use of a strict ABC Test in these industries. As the New Jersey Department of Labor considers the path ahead for this proposal, our organization urges you to heed the call of our Resolution and protect the presence of licensed independent contractors in insurance and other regulated financial professions.

By way of background, NCOIL is a legislative organization comprised principally of legislators serving on state insurance and financial institutions committees around the nation. NCOIL writes Model Laws in insurance, works to both preserve the state jurisdiction over insurance as established by the McCarran-Ferguson Act 80 years ago, and serves as an educational forum for public policy makers and interested parties.

NCOIL adopted the abovementioned Resolution in 2022 in response to increased interest in the ABC test and related issues by states and federal actors. The purpose of the Resolution was to encourage states and other entities debating worker classification policies to recognize the important role independent contracting plays in the insurance and financial services industries for both workers and consumers, and to call on government bodies to preserve independent contracting in these sectors.

In keeping with the call of our Resolution, NCOIL encourages you to amend the proposal and narrow the focus to ensure that it does not apply to licensed insurance agents and other financial professionals.

Thank you for your consideration.

Pamela J. Hunter
Speaker Pro Tempore
New York State Assembly
NCOIL President
president@ncoil.org

Will Melofchik
NCOIL CEO
wmelofchik@ncoil.org

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SECRETARY: Rep. Jim Dunnigan, UT

IMMEDIATE PAST PRESIDENT:
Rep. Tom Oliverson M.D., TX

National Council of Insurance Legislators (NCOIL)

Resolution Supporting Independent Contractor Status for Insurance Agents and Other Licensed Financial Professions

Sponsored by Asm. Ken Cooley (CA) – NCOIL President
Adopted by the Joint State-Federal Relations & International Insurance Issues Committee on March 4, 2022 and Executive Committee on March 6, 2022.

WHEREAS, there are over one million licensed insurance agents, financial advisors, and other financial professionals who operate as independent contractors in the United States, and

WHEREAS, these licensed, independent insurance agents and other financial professionals are often small business owners who have operated their own businesses for decades and have substantial relations with one or more insurance companies, broker-dealers, or registered investment advisors, and

WHEREAS, these independently contracted, licensed insurance agents and other financial professionals operate in highly regulated environments and provide vital financial services to consumers, and

WHEREAS, the presence of an independent distribution model in the insurance and financial services industries benefits consumers by providing more choice, products, and services, and

WHEREAS, workers in insurance and other financial professions, unlike workers in other industries, have the choice to work as employees or as independent contractors, and

WHEREAS, many choose to be independent as it allows producers and other professionals the freedom to select the communities in which they will work, the products they will offer, and the kind of business they will build, and

WHEREAS, surveys, including research by the National Association of Insurance and Financial Advisors (NAIFA), show licensed independent agents and other financial services professionals are overwhelmingly satisfied with their status as independent contractors and oppose policies that would take away their choice to work independently, and

WHEREAS, the future of independent work has been the subject of extended discussion nationwide as the Department of Labor (DOL) and other federal agencies, the United States Congress, and states legislatures have debated the topic of worker classification, and

WHEREAS, these debates are often centered on extending benefits and protections to workers in the so-called "gig economy" but resulting policies will have far-reaching consequences including in insurance and financial services, if not appropriately focused, and

WHEREAS, one policy under discussion in these debates is the use of a "ABC worker classification test" for determining whether a worker is an independent contractor or employee, and

WHEREAS, the "strict worker classification ABC test" is generally understood be a classification test in which a worker is deemed to be an employee unless: 1) the worker is free from the employer's control or direction in performing the work; 2) the work takes place outside the usual course of the business of the company and off the site of the business; and 3) the worker is customarily engaged in an independent trade, occupation, profession, or business; and

WHEREAS, a strict ABC test, or other similarly worker classification laws, applied to licensed professionals in the insurance and financial services industries would be extremely disruptive as it could require licensed independent producers and other financial services professionals to be classified as employees of the companies whose products they sell, and

WHEREAS, reclassifying licensed, independent producers and other financial professionals to employees would disrupt nearly one million licensed professionals, thousands of Main Street businesses that are operated by licensed financial professionals across the United States, and

WHEREAS, reclassifying licensed, independent producers and other financial professionals to employees would disrupt established and well-functioning insurance distribution channels, and

WHEREAS, reclassifying independent, licensed financial professionals to employees would limit consumers' choices and access to products and advice, and

WHEREAS, multiple states have recognized the unique environment in which licensed insurance agents and other financial services professionals operate, as well as the disruption the ABC test or other similarly worker classification laws, would cause in insurance and financial services, and

WHEREAS, multiple states have seen it appropriate to exempt licensed insurance agents and other financial professionals from recent worker classification laws enacted in that state,

NOW, THEREFORE BE IT RESOLVED that NCOIL supports the continued presence of licensed, independent contractors in insurance and other regulated financial professions, and

BE IT ALSO RESOLVED that NCOIL will encourage states and federal entities that are debating worker classification policies and that are considering adopting a strict ABC test and or other similarly worker classification laws to continue issuing exemptions for, or exempting out, licensed insurance agents and other financial professionals, and

BE IT FURTHER RESOLVED that a copy of this Resolution be sent to state legislative leaders, governors, the Department of Labor and other federal agencies, and the Senate and House Labor Committees of the United States Congress.

From:	John Webb
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Direct Selling Association Comments - NJAC 12:11 - August 5, 20025
Date:	Tuesday, August 5, 2025 6:40:42 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png US Direct Selling Association Comments for N.J.A.C. 12.11_8-5-2025.docx

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Dear Mr. Fish:

I have attached the Direct Selling Association comments on N.J.A.C 12:11.

Thanks,

John W. Webb, Vice President

DIRECT SELLING ASSOCIATION

Direct Selling Association
www.dsa.org
1667 K Street, NW
Suite 1100
Washington, DC 20006-1660
Direct: (202) 416-6410
Cell: (202) 716-7211
Phone: (202) 452-8866
Fax: (202) 452-9010
Email: jwebb@dsa.org

DIRECT SELLING ASSOCIATION
1667 K Street, NW, Suite 1100 | Washington, DC 20006-1660
202.452.8866 | Fax 202.452.9010 | www.dsa.org

Opposition to N.J.A.C. 12:11
Proposal Number: PRN 2025-051.
Submit written comments by July 4, 2025, to:
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

Submitted via Email
August 05, 2025
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: Opposition Comments on Independent Contractors Proposed New Rules N.J.A.C. 12:11; Proposal Number PRN 2025-051

Dear Mr. Fish,

In response to the May 5, 2025, New Jersey Register Notice (57 N.J.R. 894(a)), the Direct Selling Association ("DSA") appreciates the opportunity to submit comments opposing the proposed new rule N.J.A.C. 12:11, unless it is amended to exempt direct sellers consistent with other exemptions provided in New Jersey statutes. Our association represents direct selling companies and more than 6.1 million direct sellers who sell to 37.7 million preferred customers, discount buyers, and many other consumers. Direct sellers contributed $36.7 billion in estimated

retail sales to the American economy in 2024. In New Jersey, there are over 280,000 people involved in direct selling who contributed $897 million in estimated retail sales to the New Jersey economy.

Founded in 1910, DSA is the non-profit national trade association of the leading companies that manufacture and distribute goods and services sold directly to consumers through an independent, entrepreneurial salesforce. Numerous DSA member companies have been in business and engaging independent contractors to sell products and services for over 100 years. Direct selling is a retail channel used both by top name brands and small start-ups to market products and services to consumers. Direct sellers are perhaps best known to the public as person-to-person, door-to-door, or home party plan sellers. Through the efforts of direct salespersons who provide personal demonstrations, home delivery, and a variety of other sales related services, direct selling companies can offer quality products to consumers without substantial advertising or other barriers to entry found in other distribution systems, like brick-and-mortar stores.

Individuals join direct selling to fulfill personal short-term objectives (for example, working in December to earn holiday gift money). The ease of entry into and exit from the direct selling business facilitates this type of flexible sales activity. Some use the direct selling channel as a year-round supplemental income source but work only a few hours per week. Their extra direct selling income improves the quality of their lives, often keeping them in the middle class. Others pursue their businesses as careers, devoting 30 hours or more a week to the business. Yet other individuals start direct selling businesses to gain social contacts or recognition otherwise missing in their lives. Some may sell for one direct selling company, while others will sell for two or more. Individual direct sellers can often sign up to be a distributor for a

direct selling company online with minimal information and no contact with a company employee. Having flexibility and control over their direct selling business, and how they can fit this activity as part of their lives (e.g., how many hours to devote to their business, when to engage in their business, and where to conduct their business), is one of the principal reasons why individuals choose to enter into the independent contractor relationship.

DSA provides business tools, industry contacts, educational opportunity and support services to its members. In addition, DSA advocates for its members at the local, state, and federal levels. While the DSA believes that the vast majority of direct sellers and their direct selling businesses are exempt under the New Jersey Unemployment Compensation Law (the "NJ UCL"), DSA is concerned that the Independent Contractors Proposed New Rules N.J.A.C. 12:11 would create confusion in the direct selling industry and have detrimental effects on its member direct selling companies, individuals that wish to engage in direct sales work, and the New Jersey Economy. Moreover, the proposed changes to the ABC test make it difficult for direct sellers to be classified as independent contractors both inside and outside of New Jersey.

ARGUMENT

I. Individual Direct Sellers Have Near Universal Recognition as Independent Contractors

In 1982, Congress passed the Tax Equity and Fiscal Responsibility Act recognizing direct sellers as statutory non-employees under the Internal Revenue Code.[1] The legislative intent

[1] *See* 26 U.S.C. § 3508 (exempting individuals who perform services as direct sellers from the statutory definition of employee and indicating that the person whom a direct seller performs services for is not an employer).

and interpretations of this statute have been applied to a wide array of activities by direct sellers.

The direct seller exemption under federal law has been used as a framework for states to pass similar exemptions for direct sellers under unemployment compensation, workers compensation, and wage and hour laws. Forty-three states explicitly define direct sellers as independent contractors under their unemployment compensation statutes.[2] In six other states, direct sellers rely on commission or outside salesperson exemptions that generally exempt individuals compensated primarily based on commissions from the definition of employment.[3]

State laws specifically exempt direct sellers from unemployment compensation because direct sellers neither pay into the system nor do they draw from it based on their direct selling activities. Direct sellers are not employees; they are independent contractors. The direct seller exemption in these forty-three other states makes this unequivocally clear – which provides

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[2] *See* Ala. Code § 25-4-10(b)(23); Alaska Stat. § 23.20.526(a)(21); Ariz. Rev. Stat. § 23-617; Ark. Code Ann. § 11-10-210(e); Cal. Unemp. Ins. Code § 650; Colo. Rev. Stat. § 8-70-136; Del. Code Ann. tit. 19, § 3302 (11)(N); DC Code § 51–101 (2)(A)(III)(b); Fla. Stat. Ann. § 440.02 (18)(d)(1); Ga. Code Ann. § 34-8-35(18); Haw. Rev. Stat. Ann. § 383-7(a)(21); Idaho Code § 72-1316A (20); 820 Ill. Comp. Stat. Ann. 405/217; Ind. Code Ann. § 22-4-8-1; Iowa Code § 96.1A(16)(g); Kansas Statutes Sec. 44-703(i)(4)(u)(v); Ky. Rev. Stat. § 341.050; La. Rev. Stat. Ann. § 23:1472 (12)(H)(XVIII); Me. Rev. Stat. tit. 26 § 1043 (11)(F)(28); Md. Code Ann., Lab. & Empl. § 8-206; Mich. Comp. Laws Serv. § 421.43(r); Minn. Stat. Ann. § 268.035.20(31); Miss. Code Ann. § 71-5-11 (Repealed effective July 1, 2027); Mo. Rev. Stat. § 288.034; Mont. Code Ann. § 39-51-204(1)(h); Neb. Rev. Stat. Ann § 48-604(6)(t); Nev. Rev. Stat. Ann. § 612.144; N.H. Rev. Stat. Ann. § 282-A:9(IV)(s); N.C. Gen. Stat. § 96-1; Ohio Rev. Code Ann. § 4141.01 (B)(3)(g); Okla. Stat. tit. 40, § 1-210(15)(u); Or. Rev. Stat. Ann. § 657.087; 43 Pa. Stat. Ann. § 753 (L)(4)(d)(20); R.I. Gen. Laws § 28-42-7; S.C. Code Ann. § 41-27-260; Tenn. Code Ann. § 50-7-207; Tex. Lab. Code § 201.070; Utah Code Ann. § 35A-4-201; Vt. Stat. Ann. Tit. 21 § 601; Va. Code Ann. § 60.2-219 (20); Wash. Rev. Code Ann. § 50.04.235; W. Va. Code § 21A-1A-16; and Wis. Stat. Ann. § 108.02(15)(k)(16).

[3] *See* MA Gen L ch 151 § 1a(4); NM Stat § 50-4-21(C)(4); N.Y. Lab. Law § 190; ND Admin Code § 46-02-07-02(4)(g); SD Codified L § 60-11-3; and WY Stat § 27-4-201(a)(iv)(G).

certainty to businesses, regulators, and individual direct sellers. In states without specific language defining direct sellers as independent contractors, direct sellers under the Common Law or the ABC test have regardless been recognized as independent contractors for decades.

In New Jersey, the NJ UCL exempts as employment "[s]ervices performed in the sale or distribution of merchandise by home-to-home salespersons or in-the-home demonstrators whose remuneration consists wholly of commissions or commissions and bonuses[.]"[4] Proper application of the exemption under the NJ UCL should result in the exemption of direct sellers in NJ without application of the ABC test.

However, even if there were limited circumstances where certain direct selling companies would not be able to rely on the NJ UCL exemption, direct sellers have consistently been recognized as independent contractors under the ABC test for purposes of unemployment compensation and wage and hour laws.[5] The Department of Labor and Workforce Development's interpretation of the ABC test does not address these preexisting exemptions in New Jersey law. Without these exemptions classifying direct sellers as independent contractors, the direct selling industry would cease to exist.

II. Direct Sellers Are Engaged in an Independent Business

Direct sellers are truly independent. Direct selling companies do not require independent contractor direct sellers to meet any sales or network recruiting requirements. Direct sellers make sales on their own time and make their own schedule at their independent discretion. Direct

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[4] *See* N.J.S.A. 43:21-19(i)(7)(O).
[5] *See* N.J. Admin. Code § 12:56-7.1 (exempting individuals employed in an outside sales capacity from overtime requirements).

sellers make sales of goods or services to anyone, from any location they choose, and are not confined to a particular establishment, location, or territory.

Typically, all direct sellers acknowledge that he or she is an independent contractor in business for him or herself in an independent contractor agreement. They are required by contract to hold themselves out as such, and not as employees, to all customers and other members of the public. Such contracts further provide that the individual will not be treated as an employee for federal, state, or local tax purposes (including unemployment compensation taxes), require the individual direct seller to be responsible for the payment of any federal, state, or local taxes, and reserve to the individual direct seller the right to approach the business in any way he/she sees fit in pursuit of sales and profits.

Most direct sellers pay all business operating expenses, including taxes. They provide and pay for their own transportation and any other supplies or materials needed to operate their business.

Individual direct sellers are paid commissions only. All commissions paid to an individual direct seller- above $600 as required by federal law- are reported on a form 1099 and the direct seller files a Schedule C with their federal income tax returns.[6]

III. The Department of Labor and Workforce Development's Interpretation Would be Harmful to the Direct Selling Industry

Direct sellers meet state and federal statutory exemptions because they sell consumer products and services in the home and not from a retail establishment or any location owned by a company; direct sellers are paid based on sales (commissions or bonuses) and not hours worked; and direct sellers are engaged by companies pursuant to a written agreement that

[6] *See* 26 U.S.C. § 6041A.

states a direct seller is not and will not be treated as a company's employee for any purpose. Therefore, direct sellers are independent contractors, and their sales work is consequently exempt under unemployment compensation law and federal law (i.e. the work is not employment subject to unemployment contributions).[7]Nowhere in the proposed regulation are any of these exemptions mentioned. The proposed regulation also fails to mention that any of these exemptions apply to the wage, sick leave, disability benefits laws, or unemployment compensation laws.

The Department's interpretation also states that if it were to base its evaluation of an individual's services using the statutory ABC test for independent contractor status on which federal tax form the employer chose to report the individual's earnings to the IRS, or the existence of an agreement that labels the individual as an independent contractor, that this would be inconsistent with N.J.S.A. 43:21-19(i)(6) requiring an evaluation of all 3 prongs of ABC test. However, this interpretation neglects the direct seller exemption comes in and the services that are also exempt under the federal unemployment tax act.

The Department's interpretation of the ABC test is inconsistent with existing statutes and case law; and will negatively impact thousands of small businesses in New Jersey. In direct selling, the only workable model between a direct selling company and individual direct sellers is the independent contractor relationship. Changing this status as it appears the Department's interpretation would require will jeopardize the entire direct selling model in

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[7] *See* N.J.S.A. 43:21-19(i)(7)(O) (exempting as employment "[s]ervices performed in the sale or distribution of merchandise by home-to-home salespersons or in-the-home demonstrators whose remuneration consists wholly of commissions or commissions and bonuses[.]"); *See also* 28 U.S.C. § 3508 (exempting "direct sellers" from employment under federal unemployment tax law).

New Jersey, creating substantial risks to a productive element of the state's economy and tax base.

Conclusion

DSA respectfully submits its opposition to N.J.A.C. 12:11, unless amended to exempt direct sellers. These proposals are detrimental to the direct selling industry. The proposals should not be passed or at a minimum need to be amended to include a clear direct seller exemption.

From:	Grace Gold
To:	Fish, David [DOL]
Subject:	[EXTERNAL] Proposed New Rules: N.J.A.C. 12:11, ABC Test; Independent Contractors
Date:	Tuesday, August 5, 2025 7:06:04 PM
Attachments:	GraceGoldSoloSignature PNG.png

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To: David Fish, New Jersey Department of Labor & Workforce Development

Submitted via email to: david.fish@dol.nj.gov on **August 5th, 2025**

Dear Mr. Fish,

I am writing in strong opposition to the Proposed New Rules: N.J.A.C. 12:11, *ABC Test; Independent Contractors*. I urge the Department to withdraw this proposal in its entirety.

I am a self-employed journalist and broadcast contributor who has proudly run my own business for over 20 years. Like many others, I turned to self-employment not just out of professional ambition, but out of medical necessity. After years of struggling with chronic migraine while working full-time in office settings and having a doctor tell me I should go on disability, I made the decision to become my own boss so I could continue to earn a living while managing my health with flexibility and dignity.

Today, I'm a single homeowner in Rutherford, NJ. I love what I do, and my work allows me to support myself while staying well. The ability to set my own schedule and work under my own direction isn't a luxury - it's a lifeline. If I were forced out of self-employment, my health would suffer tremendously, and with it, my ability to support myself.

This proposed rule directly threatens my livelihood. I've already watched colleagues in California lose work due to the same "ABC Test" standard now under consideration in New Jersey. Creative professionals like myself, who work project-to-project, for multiple outlets, simply cannot meet the rigid, one-size-fits-all requirements of the ABC Test. Companies, fearing legal risk even when "carve outs" for industries are attempted as in California, simply stop working with us.

At the June 23, 2025 public hearing, the Chamber of Commerce warned that the proposal would "create substantial challenges for legitimate independent contractors" and that "virtually no work could be independent." The New Jersey Business and Industry Association testified that the outcome wouldn't be more jobs - it would be fewer. Even your own proposal acknowledges it will not create jobs.

Let me be clear: this isn't a partisan issue. A similar proposal was rejected by New Jersey lawmakers in 2019–2020 after widespread outcry. Today, bipartisan legislators, Democrats and Republicans alike, are again speaking out against this harmful measure.

I respectfully urge you: do not push forward with a rule that will upend the lives of countless hardworking, self-sustaining professionals across New Jersey. Withdraw this proposal, fully and immediately.

Melissa Grace Goldberg
1 Orient Way #207
Rutherford, NJ 07070
Cell: 201-370-1925

From: Jon Fulford
To: Fish, David [DOL]
Subject: [EXTERNAL] Public Comment – Support for Proposed ABC Test Regulations
Date: Tuesday, August 5, 2025 7:55:59 PM

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Dear Mr. Fish,
My name is Jon Fulford. I live in Journal Square, Jersey City, New Jersey. I'm submitting this comment in my personal capacity. I work in insurance compliance and have also worked as an app-based courier. From these experiences, I support the Department's proposed regulations clarifying New Jersey's ABC test for worker classification.

Why I support the proposal

Prong A — Control/Direction

- Companies/platforms commonly dispatch jobs, set service windows, and require personal performance.
- Pay is typically fixed or negotiated by the company; workers rarely set their own rates.
- Standard procedures/training, standby expectations, and geographic limits are routine.
  These are hallmarks of employer control, not independent contracting.

Prong B — Usual Course / Places of Business

- The services performed by these workers (e.g., delivery, installation, on-site service) are **core to the company's business**.
- Customer locations function as the company's "places of business" when essential work is performed there.
  This weighs against contractor status.

Prong C — Independently Established Business

- Many workers depend on one company or platform, don't advertise broadly, don't set market rates, and make limited capital investment.
  That is not a customarily independent enterprise.

Request

Please adopt the proposed regulations and factors. Clear guidance will deter misclassification, protect wages and unemployment coverage, and level the playing field for compliant businesses.

Privacy/Redaction Request

Please treat this submission as personal and not on behalf of any employer. Please withhold my personal email from the public docket and avoid attributing my views to any current or former employer.
Thank you for considering my comment.

Sincerely,
Jon Fulford
Journal Square, Jersey City, NJ

From: Mylena S. Sutton
To: Fish, David [DOL]
Subject: [EXTERNAL] Comment - N.J.A.C. 12:11 – Independent Contractor Classification
Date: Tuesday, August 5, 2025 8:52:52 PM
Attachments: 244b61c8.png

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Dear Mr. Fish,

I'm writing to share my objections to portions of the proposed revisions to N.J.A.C. 12:11. As an HR and Leadership Development Consultant operating as an independent business, these changes—particularly in their current form—would have a catastrophic impact on my work and may force me to seek traditional employment simply to remain in compliance.

Objection to Prong B – "The work is performed outside the usual course or place of business"
This provision should be dropped entirely. It fails to reflect the reality of project-based consulting and how professional services are delivered. I often design focus groups and employee training programs remotely, but delivery nearly always takes place at client sites. Few, if any, organizations would hire a W-2 employee for one-time engagements such as a staff retreat or conflict resolution process. Additionally, the "location" test seems short-sighted given the prevalence of remote work. One of my former clients was based in California; another in South Dakota. Both engagements were performed virtually through Zoom. Would this still be considered "onsite"?

Prong C – "The worker is engaged in an independently established trade or business"
This closely mirrors existing IRS standards, and I support its spirit. When I hire contractors, I provide no training or materials; how they meet contractual obligations is their responsibility. I typically work only with contractors who carry liability insurance, operate under their own branding (including websites and social media presence), and have other active clients. These practices are not only IRS-compliant—they've also been required by my workers comp provider. In fact, I've been told that without proof a worker was truly independent, I'd be financially responsible for coverage.

That said, ambiguity remains. What happens when a consulting engagement spans several months with frequent touchpoints? Could the volume of interaction be misinterpreted as control?

Prong A – "The worker is free from control or direction by the business"
I generally support this prong. However, clearer guidance is needed. For example, with creative freelancers—video editors, designers, etc.—some level of direction is necessary to ensure deliverables match expectations. What defines acceptable collaboration versus unlawful control?

Suggestions for Revision and Implementation:

1. **Create a hotline** for workers and businesses to clarify proper classification. Penalties should be rehabilitative, not punitive—scaled to organizational revenue and intent. Not all misclassification stems from bad faith.

2. **Protect misclassified workers** who report violations. Many hesitate to file complaints due to long wait times and uncertain outcomes. Speedy, confidential resolution pathways would encourage transparency.

3. **Expand training and outreach**—especially for small business owners. I learned about this legislation via Facebook. For entrepreneurs managing intense regulatory burdens, proactive education is essential.

4. **Provide clear use-case examples** of compliant and non-compliant arrangements, including hybrid and remote scenarios. Consultants and clients alike need guidance grounded in today's work realities.

As someone who has been misclassified before—and remained silent out of financial necessity—I know firsthand how these issues unfold. A former client trained and directed a group of facilitators in ways that reflected employee status. Still, I didn't push back. I was hired for my facilitation expertise, not my HR lens.

I appreciate the Department's effort to protect workers. I ask that these rules reflect the diversity of independent work, especially in project-based and knowledge-driven fields. Thank you for your time and consideration.

Warm regards,
Mylena S. Sutton
Founder & Principal Consultant
Voltage Vista Consulting and Coaching
Haddonfield, NJ

Voltage Vista Consulting
We partner with leaders like you to fix people problems & get your team aligned!

Please note that I aim to return emails within 48 hours, and that I don't email from 5:30pm to 8am. If your issue is urgent, please call (not text) 856-528-9750 or contact my assistant, Angela, at angela@voltagevista.com.

From: David Easton
To: Fish, David [DOL]
Subject: [EXTERNAL] Independent Contractors
Date: Tuesday, August 5, 2025 9:21:01 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 8/5/2025

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.

As a professional musician, I have the privilege of working on both sides of being an independent contractor.

As a bandleader, I hire musicians to play with me and they are all hired as independent sub-contractors. It would place a huge hardship on my business if I were to have to place them on payroll as I do not have enough work to hire them full time, yet I rely on their services to a large enough extent that it would make it difficult for me to keep working unless I were only to play as a solo act.

I am also from time to time hired as a sideman by other musicians in just the same way and I imagine those people who hire me would be in a similar situation.

Please understand that being a musician is sometimes a patchwork of gigs that come from different sources. Not all of us work on Broadway or something like that.

Being an independent contractor and being able to hire other musicians as such allows the opportunity to work freely.

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,
David Easton

www.davideaston.com

Sent from the all new AOL app for Android

From: Frank Promutico
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 12:39:21 AM

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Dear Executive Director David Fish,

My name is Frank Promutico, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Frank Promutico
220 FALCON DR
Little Egg Harbor Twp, NJ 08087-1711

promutici47@gmail.com
732-232-7378

From: Brian Garrahan
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 3:13:18 AM

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Dear Executive Director David Fish,

My name is Brian Garrahan, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Brian Garrahan
368 Kinderkamack Rd
Oradell, NJ 07649-1539

telecom9422@optimum.net
201-615-1845

From: Brian Garrahan
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 3:14:16 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Brian Garrahan, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Sincerely,

Brian Garrahan
368 Kinderkamack Rd
Oradell, NJ 07649-1539

telecom9422@optimum.net
201-615-1845

From: Chavin Haines
To: Fish, David [DOL]
Subject: [EXTERNAL] On Classifying Rideshare Drivers and other Gig Workers As Employees
Date: Wednesday, August 6, 2025 4:15:56 AM

This Message Is From an Untrusted Sender
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Executive Director Fish,

I am writing to express my extremely strong support for (N.J.A.C. 12:11), codifying the 'ABC' metric for classifying the status of workers as employees vs. independent contractors, as described in this letter from Human Rights Watch. Worker's protections for these 'independent contractors' are sorely lacking, and I firmly feel this measure will help improve material conditions for some of the most exploited workers in the economy of New Jersey today.

Respectfully,
Chavin Haines (NJ Resident, former rideshare driver)

From: [redacted]
To: Fish, David [DOL]
Subject: Re: [EXTERNAL] N.J.A.C. 12:11 ABC Test Independent Contractors
Date: Wednesday, August 6, 2025 6:59:14 AM
Attachments: Support Ltr. NJAC 1211 ABC Test Ind. Contract. signed.pdf

---

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Good Morning David,
my letter is both an attachment (signed copy) to this email as well as in the body of the email.
not sure which way is best.

[redacted]

[redacted]

8/6/2025

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

Support Letter

To Whom,

This letter is to register that I am in support of the rule proposal.

I have had my financial planning practice for approx. 30yrs.

When I first started, I was an employee of a division of American Express known as American Express Financial Advisors.

Soon after starting, American Express Financial Advisors split into 2 parts: employee side and franchise side (independent contractors).

We had no choice but to become a “Franchisee”

A number of years later, American Express spun off our division, and we became Ameriprise Financial.

Ameriprise Financial maintained that structure.

Over the years there has been an obvious consolidation of control over the franchise side to emulate employees, yet insisting we are independent contractors. Most infringements and violations seem to fall under the guise of "company policy".

As a result, I am in support of the rule proposal N.J.A.C. 12:11, ABC Test: Independent Contractors

My support stems from the position of ensuring there is a clear pathway that our franchisor follows to stay in their lane (or get back in to it), follows the set rules, and it is incumbent upon the franchisor to demonstrate and prove that they are adhering to it.

At some point, I would be willing would to talk/register my comments, experiences and story to someone regarding this continuous and increasing designed structure of " control everything, own nothing".

It may be beneficial to speak before the voting happens on the new rule proposal N.J.A.C. 12:11, ABC Test: Independent Contractors

I request anonymity, that any of my correspondence, communication, and meetings be discreet, confidential and refrain from referring to me by name within the body of any public rulemaking notice.

This is my personal email address and I request all communications to utilize this and not through my [redacted] email address.

For background on me, my website is [redacted] and i am also on linked in.

Thank you for your attention

[redacted]

From: Erfan Nemati
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:44 AM

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Dear Executive Director David Fish,

My name is Erfan Nemati, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Erfan Nemati
294 coolidge ave
Englewood, NJ 07631-3851

xxernexx81@gmail.com
201-370-4137

From: Beverly Simpson
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:44 AM

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Dear Executive Director David Fish,

My name is Beverly Simpson , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Beverly Simpson
130 Ellis ave
Irvington, NJ 07111-5836

beverly.natasha@icloud.com
908-743-0010

From: Anthony Townsend
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:44 AM

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Dear Executive Director David Fish,

My name is Anthony Townsend , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Anthony Townsend
210 north grove street
East Orange, NJ 07017-4470

uptopboy84@yahoo.com
973-280-9044

From: Kazumbe Ngoye
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:44 AM

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Dear Executive Director David Fish,

My name is Kazumbe Ngoye, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Kazumbe Ngoye
1603 West 4th Street
Piscataway, NJ 08854-1857

kazumbengoye@yahoo.com
732-267-9128

From: Aayush Bhattacharya
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:44 AM

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Dear Executive Director David Fish,

My name is Aayush Bhattacharya , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Aayush Bhattacharya
407 Ironwood Lane
Morganville, NJ 07751-4069

aayushbhatt03@gmail.com
732-599-8844

From: Giovanni Castro
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:00:45 AM

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Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

Trabajar con DoorDash como Dasher me permite acceder a un trabajo que se adapta a mi vida. Ser contratista independiente significa ser mi propio jefe. Puedo elegir cuándo, dónde y cómo trabajar, lo que me permite usar el dashing como mejor me funcione. Esta norma amenaza esa flexibilidad al restringir mi trabajo y dificultar que personas como yo elijan trabajar de forma independiente.

El dashing me permite obtener ingresos adicionales cuando los necesito, ya sean unas pocas horas a la semana o más. Si esta norma se aprueba, podría obligarme a trabajar bajo unas normas laborales rígidas que no me convienen. Tendría menos control sobre mi trabajo, lo que dificultaría obtener los ingresos adicionales de los que dependo.

Sé que la mayoría de los Dashers, incluyéndome a mí, queremos seguir siendo contratistas independientes. No queremos ser empleados. Esta norma podría quitarnos esa opción y obligarnos a una estructura laboral tradicional que no se ajusta a nuestra forma de trabajar ni a nuestra necesidad de ganar dinero. Es crucial que tengamos la libertad de decidir cómo trabajar, y esta norma podría quitárnosla.

Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Giovanni Castro
1016 Belmont Ave
South Plainfield, NJ 07080-4302
giokastro@gmail.com
732-874-0160

From: Julio Valdes
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:45 AM

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Dear Executive Director David Fish,

My name is Julio Valdes , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Julio Valdes
15 Aida Ct
Lodi, NJ 07644-2511

gexelsan1.2@gmail.com
201-587-5214

From: Wafik Fakhouri
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:45 AM

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Dear Executive Director David Fish,

My name is Wafik Fakhouri , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Wafik Fakhouri
178 Malcolm Ave
Garfield, NJ 07026-1220

andreapailora@yahoo.com
201-424-4847

From: Imani Tho
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:45 AM

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Dear Executive Director David Fish,

My name is Imani Tho, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Imani Tho
72 Paterson St
Paterson, NJ 07501-1430

dionaimani@gmail.com
917-227-0231

From: Angelo Pavia Ramirez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:45 AM

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Dear Executive Director David Fish,

My name is Angelo Pavia Ramirez , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Angelo Pavia Ramirez
132 Lexington Ave
Staten Island, NY 10302-2000

angelopavia960@gmail.com
929-595-5160

From: Quasheir Dorn
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:45 AM

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Dear Executive Director David Fish,

My name is Quasheir Dorn, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Quasheir Dorn
769 Coolidge Ave
Toms River, NJ 08753-7847

qdorn13@gmail.com
732-797-8437

From: Francis Juliano
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:46 AM

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Dear Executive Director David Fish,

My name is Francis Juliano, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Francis Juliano
18 Rose Court
Mount Laurel, NJ 08054-2526

cong513@hotmail.com
609-790-3574

From: Dennis Devlin
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:46 AM

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Dear Executive Director David Fish,

My name is Dennis Devlin, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dennis Devlin
70 Makepeace drive
Oak Ridge, NJ 07438-9594

dennisdevlin7@gmail.com
862-668-7947

From: George Capertina
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:46 AM

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Dear Executive Director David Fish,

My name is George Capertina , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

George Capertina
530 Sicklerville Rd
Williamstown, NJ 08094-1215

bcapertina@icloud.com
856-524-4609

From: Kevin Frazier
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:46 AM

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

Report Suspicious

Dear Executive Director David Fish,

My name is Kevin Frazier, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Kevin Frazier
38 Park Ave
Bayville, NJ 08721-1932

lovesmydrpepper43@gmail.com
732-402-7292

From: Rafael Rodriguez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:46 AM

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Dear Executive Director David Fish,

My name is Rafael Rodriguez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rafael Rodriguez
80 Racetrack Road
East Brunswick, NJ 08816-3719

rrk235@yahoo.com
917-302-0091

From: John King
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:46 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is John King, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

John King
1165 Mayfair Ct
Vineland, NJ 08360-2454

shotout1234@gmail.com
609-635-6055

From: Jovanny Rodriguez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:46 AM

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Dear Executive Director David Fish,

My name is Jovanny Rodriguez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jovanny Rodriguez
759 chambers street
Trenton, NJ 08611-3707

jrodriguez200277@Icloud.com
609-533-6517

From: Mir Ali
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:47 AM

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Dear Executive Director David Fish,

My name is Mir Ali, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Mir Ali
3 Balamor Ln
Ewing, NJ 08628-2233

drmirali4@gmail.com
848-237-9552

From: Jeff Raub
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:47 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Jeff Raub, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jeff Raub
34 Shady Ln
Bound Brook, NJ 08805-1306

jnoyx@aol.com
732-841-3563

From: Faith Raroha
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:47 AM

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Dear Executive Director David Fish,

My name is Faith Raroha, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Faith Raroha
1063 Bradford Dr
Williamstown, NJ 08094-2709

faithraroha@yahoo.com
856-889-7819

From: Sasha Martinez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:47 AM

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Dear Executive Director David Fish,

My name is Sasha Martinez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sasha Martinez
214 William Street, 3
Harrison, NJ 07029-2684

Sashae146@gmail.com
201-989-7140

From: Shaquille Barnes
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:47 AM

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Dear Executive Director David Fish,

My name is Shaquille Barnes, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Shaquille Barnes
1337 WillowGrove Rd
Monroeville, NJ 08343-4537

gazorbeam23@yahoo.com
609-456-5542

From: Isaac Pernell
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:47 AM

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Dear Executive Director David Fish,

My name is Isaac Pernell, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Isaac Pernell
13 W End Ave
Pennsauken, NJ 08109-1850

isaacpernell@ymail.com
609-880-4536

From: David Tonne jr
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:47 AM

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Dear Executive Director David Fish,

My name is David Tonne jr, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

David Tonne jr
15 laurel ave, Room 44
Keansburg, NJ 07734-1124

tonnejr.dave@gmail.com
848-565-0525

From: Alexis Kulinski
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:47 AM

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Dear Executive Director David Fish,

My name is Alexis Kulinski, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Alexis Kulinski
1 Harrison Road, Kinnelon, NJ
Kinnelon, NJ 07405-2518

alexiskulinski@yahoo.com
414-324-6919

From: Gregory Concepcion
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:47 AM

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Dear Executive Director David Fish,

My name is Gregory Concepcion, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Gregory Concepcion
1 Ringwood Ave.
Wanaque, NJ 07465-2212

grei111315@gmail.com
973-641-9167

From: John Minervini
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:47 AM

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Dear Executive Director David Fish,

My name is John Minervini, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

John Minervini
269 11th St
Palisades Park, NJ 07650-4101

john8158@verizon.net
201-981-9131

From: Lindsey Nelson
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

My name is Lindsey Nelson, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lindsey Nelson
15 Appletree Ln
Old Bridge, NJ 08857-2073

lkosovich6683@gmail.com
732-754-4856

From: PATRICK O"DONNELL
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

My name is PATRICK O'DONNELL, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

PATRICK O'DONNELL
656 WASHINGTON AVE
Woodbury, NJ 08096-3545

patod73@yahoo.com
856-812-1861

From: Richard Laboy
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

My name is Richard Laboy, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Richard Laboy
24 Kennedy Ave
Ogdensburg, NJ 07439-1252

rjlaboy5784@gmail.com
973-996-5158

From: Maria Kheir
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Maria Kheir, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Maria Kheir
19 Pebble Beach Court
Toms River, NJ 08757-5914

mkheir67@gmail.com
732-789-6519

From: Ivonnette Crespo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

My name is Ivonnette Crespo , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ivonnette Crespo
24 Schindler Ct
Neptune, NJ 07753-8208

icrespo723@yahoo.com
803-942-5953

From: James Larmour
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

My name is James Larmour, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

James Larmour
8B garden avenue
Blackwood, NJ 08012-4833

jimmylarmour7@gmail.com
856-535-6673

From: Kevin Pieslak
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

My name is Kevin Pieslak, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Kevin Pieslak
2321 N Firelane Rd
Southampton, NJ 08088-3538

bringthepain18@aol.com
609-407-3938

From: Patty Colaprico
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

My name is Patty Colaprico, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Patty Colaprico
5 Ganton Way
Manalapan, NJ 07726-9350

pattycolaprico@gmail.com
732-539-0166

From: Oscar Florentino
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

My name is Oscar Florentino, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Oscar Florentino
108 Fayette St, Apt A4
Perth Amboy, NJ 08861-4201

oscarider2002@gmail.com
551-389-1801

From: Rafael Rodriguez
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

Trabajar con DoorDash como Dasher me permite acceder a un trabajo que se adapta a mi vida. Ser contratista independiente significa ser mi propio jefe. Puedo elegir cuándo, dónde y cómo trabajar, lo que me permite usar el dashing como mejor me funcione. Esta norma amenaza esa flexibilidad al restringir mi trabajo y dificultar que personas como yo elijan trabajar de forma independiente.

El dashing me permite obtener ingresos adicionales cuando los necesito, ya sean unas pocas horas a la semana o más. Si esta norma se aprueba, podría obligarme a trabajar bajo unas normas laborales rígidas que no me convienen. Tendría menos control sobre mi trabajo, lo que dificultaría obtener los ingresos adicionales de los que dependo.

Sé que la mayoría de los Dashers, incluyéndome a mí, queremos seguir siendo contratistas independientes. No queremos ser empleados. Esta norma podría quitarnos esa opción y obligarnos a una estructura laboral tradicional que no se ajusta a nuestra forma de trabajar ni a nuestra necesidad de ganar dinero. Es crucial que tengamos la libertad de decidir cómo trabajar, y esta norma podría quitárnosla.

Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Rafael Rodriguez
57burnside av ,
Cranford, NJ 07016-2685
rrodriguez973@gmail.com
973-489-3057

From: Yaitza Rivera
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

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Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Yaitza Rivera
3107 emerald st,
Philadelphia, PA 19134-3101
riveragarallarde@gmail.com
267-269-2747

From: Michael Kowalczyk
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

My name is Michael Kowalczyk, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michael Kowalczyk
279 Edgeware Court
Somerset, NJ 08873-4847

kowalczyk.mike.e@gmail.com
908-635-2629

From: William Giordano
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:48 AM

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Dear Executive Director David Fish,

My name is William Giordano , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

William Giordano
35 Hollywood Ave, Somerset NJ
Somerset, NJ 08873-1419

gio2now3@msn.com
732-545-7438

From: Rafael Rodriguez
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:00:49 AM

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Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

Trabajar con DoorDash como Dasher me permite acceder a un trabajo que se adapta a mi vida. Ser contratista independiente significa ser mi propio jefe. Puedo elegir cuándo, dónde y cómo trabajar, lo que me permite usar el dashing como mejor me funcione. Esta norma amenaza esa flexibilidad al restringir mi trabajo y dificultar que personas como yo elijan trabajar de forma independiente.

El dashing me permite obtener ingresos adicionales cuando los necesito, ya sean unas pocas horas a la semana o más. Si esta norma se aprueba, podría obligarme a trabajar bajo unas normas laborales rígidas que no me convienen. Tendría menos control sobre mi trabajo, lo que dificultaría obtener los ingresos adicionales de los que dependo.

Sé que la mayoría de los Dashers, incluyéndome a mí, queremos seguir siendo contratistas independientes. No queremos ser empleados. Esta norma podría quitarnos esa opción y obligarnos a una estructura laboral tradicional que no se ajusta a nuestra forma de trabajar ni a nuestra necesidad de ganar dinero. Es crucial que tengamos la libertad de decidir cómo trabajar, y esta norma podría quitárnosla.

Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Rafael Rodriguez
57burnside av ,
Cranford, NJ 07016-2685
rrodriguez973@gmail.com
973-489-3057

From: Erick Cancinos
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:49 AM

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Dear Executive Director David Fish,

My name is Erick Cancinos, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Erick Cancinos
1314 N OLDEN AVE
Trenton, NJ 08638-4911

eacv.erick11@gmail.com
609-610-6122

From: Dorde Parezanovic
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:49 AM

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Dear Executive Director David Fish,

My name is Dorde Parezanovic, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dorde Parezanovic
519 park ave
Scotch Plains, NJ 07076-1739

djole.kralj@icloud.com
516-919-0194

From: Ray Melms
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:49 AM

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Dear Executive Director David Fish,

My name is Ray Melms, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ray Melms
30 Hamilton Ct
Toms River, NJ 08757-4518

keysnts@gmail.com
908-216-2413

From: Emily Cintron
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:49 AM

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Dear Executive Director David Fish,

My name is Emily Cintron, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Emily Cintron
107 Franklin Drive, Building 72 apartment c
Maple Shade, NJ 08052-7406

emilya.cintron0504@gmail.com
856-630-3627

From: NASHIR PATEL
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:49 AM

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Dear Executive Director David Fish,

My name is NASHIR PATEL, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

NASHIR PATEL
1020 WOODLANE RD APT 124
Beverly, NJ 08010-3207

nashir_patel2002@yahoo.com
609-444-8812

From: Jason Figueiredo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:49 AM

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Dear Executive Director David Fish,

My name is Jason Figueiredo , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jason Figueiredo
2275 Allen st
Rahway, NJ 07065-4404

jasonfigueiredo1@gmail.com
908-845-6156

From: Jose Fermin
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:49 AM

This Message Is From an External Sender
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Report Suspicious

Dear Executive Director David Fish,

My name is Jose Fermin, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jose Fermin
205 Midland Ave
Kearny, NJ 07032-3546

fermin1275@gmail.com
201-320-9881

From: Sabri can Ugur
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:49 AM

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This message came from outside your organization.

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Dear Executive Director David Fish,

My name is Sabri can Ugur, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sabri can Ugur
600 Frank E Rodgers Blvd S
Harrison, NJ 07029-3207

can.ugurusa@icloud.com
646-918-3611

From: Anastasiia Petrova
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:49 AM

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Dear Executive Director David Fish,

My name is Anastasiia Petrova, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Anastasiia Petrova
.4461 Ernie Davis Cir Philadelphia PA
Philadelphia, PA 19154-1752

nastya2007.2010@mail.ru
267-770-5093

From: Billy Hernandez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:49 AM

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Dear Executive Director David Fish,

My name is Billy Hernandez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Billy Hernandez
181 Carlton Ave
Piscataway, NJ 08854-3007

bronxboogie82@yahoo.com
732-407-5695

From: JOHN YOURNET
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is JOHN YOURNET, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

JOHN YOURNET
23 S 2ND ST
Elizabethport, NJ 07206-1606

jy93honda@gmail.com
908-764-4227

From: Michael DeLuccia
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is Michael DeLuccia, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michael DeLuccia
4 Bayberry Court
Upper Saddle River, NJ 07458-2359

deluccia.michael29@gmail.com
973-914-0266

From: Christopher Petrella
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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This message came from outside your organization.

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Dear Executive Director David Fish,

My name is Christopher Petrella , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Christopher Petrella
328 S. Coles Ave. Maple Shade NJ
Maple Shade, NJ 08052-3217

brickman1018@yahoo.com
856-924-0944

From: Katelyn Checetto
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is Katelyn Checetto, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Katelyn Checetto
310 Columbia Ave
Stratford, NJ 08084-1149

katelynchecetto@gmail.com
856-515-2953

From: Marvin Ruiz
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is Marvin Ruiz, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Marvin Ruiz
112 Terrace Ave Camden NJ
Camden, NJ 08105-3038

marv7529@gmail.com
856-295-1475

From: Rene Acevedo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is Acevedo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rene Acevedo
303 Knoll Dr
Blackwood, NJ 08012-5405

reneace1350@icloud.com
856-418-7759

From: Kadees Ekladyous
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is Kadees Ekladyous, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Kadees Ekladyous
167 Catherine st red bank Nj
Red Bank, NJ 07701-1243

kadeesekladyous@yahoo.com
201-658-1276

From: Moiz Rana
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is Moiz Rana, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Moiz Rana
2 Foxhall
Middlesex, NJ 08846-2277

Moiz_rana2002@yahoo.com
732-688-3568

From: Kristen Gannon
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is Kristen Gannon, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Kristen Gannon
912 North Beecham Road
Williamstown, NJ 08094-2102

kristenagannon@gmail.com
410-693-5144

From: Joshua Martin
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is Joshua Martin, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Joshua Martin
202 Winding Way
Westville, NJ 08093-2210

joshuaaa022@hotmail.com
856-430-1967

From: Kevin Urban
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is Kevin Urban, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Kevin Urban
120 Sunset Drive
Mount Royal, NJ 08061-1020

kturban@comcast.net
856-468-5323

From: Jacqueline Barrales
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:50 AM

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Dear Executive Director David Fish,

My name is Jacqueline Barrales, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jacqueline Barrales
160 Rosa Parks Blvd
Paterson, NJ 07501-1325

jacquelinebarrales93@gmail.com
973-861-6299

From: Kristina Giglio
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Dear Executive Director David Fish,

My name is Kristina Giglio, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Kristina Giglio
114 Cookstown New Egypt Rd, G1
Wrightstown, NJ 08562-1711

krosario723@yahoo.com
732-930-9886

From: Tun Tun
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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

Report Suspicious

Dear Executive Director David Fish,

My name is Tun Tun, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Tun Tun
931 center ave
Bellmawr, NJ 08031-1610

tunminaung80@gmail.com
267-312-1232

From: Jorge Dajer
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Dear Executive Director David Fish,

My name is Jorge Dajer, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jorge Dajer
31-35 east 11th Bayonne Nj
Bayonne, NJ 07002-2557

Jorgelabrega@gmail.com
551-997-8089

From: Peter Foti
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Dear Executive Director David Fish,

My name is Peter Foti, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Peter Foti
16 Creek rd Sewell nj
Sewell, NJ 08080-2720

pfmaven@verizon.net
215-341-7741

From: Shebron Fletcher
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Dear Executive Director David Fish,

My name is Shebron Fletcher, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Shebron Fletcher
10007 AVALON WAY
Piscataway, NJ 08854-7036

shebronfletcher@ymail.com
609-865-3927

From: Fabiane Goncalves
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Dear Executive Director David Fish,

My name is Fabiane Goncalves, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Fabiane Goncalves
419 Jersey Ave
Fairview, NJ 07022-1204

fgoncalves228@yahoo.com
201-923-6516

From: Aimee Loving
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Dear Executive Director David Fish,

My name is Aimee Loving, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Aimee Loving
158 Norcross Road
Berlin, NJ 08009-9664

loving.aimee2@gmail.com
856-821-2798

From: Andris Taveras
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Dear Executive Director David Fish,

My name is Andris Taveras, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Andris Taveras
85 presidential blvd
Paterson, NJ 07522-2170

andristavera@gmail.com
862-428-9818

From: Zachary Gurick
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Dear Executive Director David Fish,

My name is Zachary Gurick , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Zachary Gurick
2-50 Virginia Dr
Fair Lawn, NJ 07410-4723

zg2426@aim.com
201-803-4641

From: Alex Castro
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Dear Executive Director David Fish,

My name is Alex Castro, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Alex Castro
201 oak st Weehawken nj
Weehawken, NJ 07086-5611

alexcastro2300@yahoo.com
201-882-2885

From: Charles Fuchs
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Dear Executive Director David Fish,

My name is Charles Fuchs, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Charles Fuchs
138 Countryside Drive
Basking Ridge, NJ 07920-2037

shakawtwf@hotmail.com
973-766-4259

From: Ariel Ramírez
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:00:51 AM

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This message came from outside your organization.

Report Suspicious

Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

Trabajar con DoorDash como Dasher me permite acceder a un trabajo que se adapta a mi vida. Ser contratista independiente significa ser mi propio jefe. Puedo elegir cuándo, dónde y cómo trabajar, lo que me permite usar el dashing como mejor me funcione. Esta norma amenaza esa flexibilidad al restringir mi trabajo y dificultar que personas como yo elijan trabajar de forma independiente.

El dashing me permite obtener ingresos adicionales cuando los necesito, ya sean unas pocas horas a la semana o más. Si esta norma se aprueba, podría obligarme a trabajar bajo unas normas laborales rígidas que no me convienen. Tendría menos control sobre mi trabajo, lo que dificultaría obtener los ingresos adicionales de los que dependo.

Sé que la mayoría de los Dashers, incluyéndome a mí, queremos seguir siendo contratistas independientes. No queremos ser empleados. Esta norma podría quitarnos esa opción y obligarnos a una estructura laboral tradicional que no se ajusta a nuestra forma de trabajar ni a nuestra necesidad de ganar dinero. Es crucial que tengamos la libertad de decidir cómo trabajar, y esta norma podría quitárnosla.

Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Ariel Ramírez
312 Quaker Church Rd
Randolph, NJ 07869-1370
arielheavy@hotmail.com
862-425-8479

From: Dawin Ricardo
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:00:51 AM

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Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Dawin Ricardo
209 Harrison St
Paterson, NJ 07501-1330
Lilkid809@ymail.com
973-981-0808

From: Christopher Rotoli
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Christopher Rotoli, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Christopher Rotoli
6 Overlook Court
Medford, NJ 08055-3834

crotoli77@yahoo.com
609-410-8272

From: George Speidel
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is George Speidel , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

George Speidel
5 Pauls Place
Middletown, NJ 07748-2218

Speidel1@aol.com
201-665-7990

From: Eufracia Tejada
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Eufracia Tejada, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Eufracia Tejada
15 Maple St
New Brunswick, NJ 08901-2213

ktejada0405@icloud.com
732-762-5749

From: Justin Kaplan
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Justin Kaplan, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Justin Kaplan
29 Twin Rivers Drive North
East Windsor, NJ 08520-5533

Justinadamkaplan@gmail.com
609-902-7299

From: Rose Aguilar
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Rose Aguilar, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rose Aguilar
99 royal drive apt 449 Piscataway nj
Piscataway, NJ 08854-3787

rosesnedeker28@yahoo.com
848-228-9372

From: Ali Sheikh
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

This Message Is From an External Sender
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Report Suspicious

Dear Executive Director David Fish,

My name is Ali Sheikh, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ali Sheikh
322 Pegasus rd Piscataway nj
Piscataway, NJ 08854-5464

alishaykh15@gmail.com
929-275-0371

From: Sal Stanziola
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Sal Stanziola , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sal Stanziola
540 Broad Street Newark NJ
Newark, NJ 07102-3108

stanziolafamily@gmail.com
973-900-0286

From: Patrick Cagney
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Patrick Cagney, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Patrick Cagney
60 Harvey Street
Closter, NJ 07624-1132

patrickcagney14@gmail.com
201-423-2223

From: Sharita Carr
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Sharita Carr, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sharita Carr
107 Hollybush gardens
Glassboro, NJ 08028-2335

sharitacarr99@gmail.com
856-956-8115

From: Carlos Cruz
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Carlos Cruz, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Carlos Cruz
5 Netcong HTS, 11 apt
Netcong, NJ 07857-1705

carcrumen22@gmail.com
973-810-6883

From: Amber Dehaas
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Amber Dehaas, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Amber Dehaas
79 n jackson Ave Washington nj
Washington, NJ 07882-1762

amber15dehaas@gmail.com
908-319-9248

From: Johanna Timmons
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Johanna Timmons, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Johanna Timmons
49 Taylor Ave.
Milmay, NJ 08340-2017

johanna.tims.3984@gmail.com
609-992-8500

From: Vincenzo Palmiero
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Vincenzo Palmiero, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Vincenzo Palmiero
33 Lexington Circle
Matawan, NJ 07747-3764

palmierov@yahoo.com
732-379-7656

From: Ebony Perez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Ebony , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ebony Perez
65 E 99th St
New York, NY 10029-6009

dulce36nyc@gmail.com
347-371-7933

From: Richard Sassi
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:52 AM

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Dear Executive Director David Fish,

My name is Richard Sassi, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Richard Sassi
45 beach ave
Pennsville, NJ 08070-1621

ricksassi@yahoo.com
856-275-6067

From: Çağrı Çakmak
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:53 AM

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Dear Executive Director David Fish,

My name is Çağrı Çakmak, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Çağrı Çakmak
621 West walnut road
Vineland, NJ 08360-6387

Cagricakmak1228@icloud.com
631-507-9047

From: Brian F3e
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:53 AM

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Dear Executive Director David Fish,

My name is Brian F3e, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Brian F3e
1605 Barclay Boulevard
Princeton, NJ 08540-5889

fee.brian@yahoo.com
520-343-0198

From: Anis Miled
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:53 AM

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Dear Executive Director David Fish,

My name is Anis Miled, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Anis Miled
28 Hudson Street
Manahawkin, NJ 08050-6047

anismiled.miled@gmail.com
862-270-9866

From: Nicole Gallagher
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:53 AM

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Dear Executive Director David Fish,

My name is Nicole Gallagher , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Nicole Gallagher
157 Stoneshire Drive
Glassboro, NJ 08028-2978

galla75@verizon.net
609-364-4189

From: Truong Nguyen
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:53 AM

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Dear Executive Director David Fish,

My name is Truong Nguyen, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Truong Nguyen
1 Mulberry rd
Blackwood, NJ 08012-2144

tbn1587@gmail.com
215-917-9168

From: Karlie Leigh
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:53 AM

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Dear Executive Director David Fish,

My name is Karlie Leigh , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Karlie Leigh
2 Autumn Ct
Blackwood, NJ 08012-5314

karlieleighann3@live.com
732-395-0493

From: Sam Rashkovskiy
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:53 AM

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Dear Executive Director David Fish,

My name is Sam Rashkovskiy , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sam Rashkovskiy
416B Onset Lane
Monroe Township, NJ 08831-8251

sam.rashkovskiy@gmail.com
732-580-7611

From: Ahmed Elmarasy
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:53 AM

This Message Is From an External Sender
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Report Suspicious

Dear Executive Director David Fish,

My name is Ahmed Elmarasy, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ahmed Elmarasy
117 ELIZABETH AVE
Asbury Park, NJ 07712-6725

newahmedelmarasy@gmail.com
267-836-3646

From: Adam Filoso
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:53 AM

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Dear Executive Director David Fish,

My name is Adam Filoso, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Adam Filoso
287 skymanor
Brick, NJ 08723-6862

afiloso13@gmail.com
732-890-8512

From: Sarah Snyder
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:53 AM

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Dear Executive Director David Fish,

My name is Sarah Snyder, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sarah Snyder
7 holly dr
Succasunna, NJ 07876-1829

ssnyder7585@gmail.com
201-697-3156

From: Burak Guven
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is Burak Guven , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Burak Guven
55 Linwood apt avenua Elmwood park new jersey
Elmwood Park, NJ 07407-1736

burak.guven2534@icloud.com
862-387-9316

From: Gina Kidd
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is Gina Kidd, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Gina Kidd
2222 4th Ave
Toms River, NJ 08753-6020

gina.kidd@yahoo.com
848-240-9177

From: Marjorie Chulsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is Marjorie Chulsky , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Marjorie Chulsky
443 Narragansett Ave
Long Branch, NJ 07740-7662

mchulsky@yahoo.com
732-693-3293

From: D'Angelo Padilla
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is D'Angelo Padilla, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

D'Angelo Padilla
18 hilton Avenue
Maplewood, NJ 07040-2921

dpad97@gmail.com
862-205-1003

From: Ashley McKiernan
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is Ashley McKiernan, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ashley McKiernan
1025 Mount Holly Rd
Beverly, NJ 08010-1639

Ashleymckiernan1203@gmail.com
609-784-3118

From: ARQUIMEDES Santana
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is ARQUIMEDES Santana , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

ARQUIMEDES Santana
730 Newark av Jersey City nj 07306
Jersey City, NJ 07306-2822

bienvenidosantana769@gmail.com
201-903-5122

From: Paul Stroman
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is Paul Stroman, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Paul Stroman
44 tucker street apt2
Trenton, NJ 08618-4732

pstroman609@hotmail.com
609-533-8236

From: Heather Irwin
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is Heather Irwin , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Heather Irwin
25 South Church Rd Unit 55
Maple Shade, NJ 08052-3057

heathermholley@yahoo.com
732-718-9746

From: Laura Klippel
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is Laura Klippel, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Laura Klippel
25 Boulder Hills Blvd
Sussex, NJ 07461-5466

laklippel@yahoo.com
973-896-1938

From: Patrick Moran
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is Patrick Moran, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Patrick Moran
150 Brewster Street
Browns Mills, NJ 08015-1934

pdmoran@gmail.com
732-939-8640

From: carlos jimenez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:54 AM

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Dear Executive Director David Fish,

My name is carlos jimenez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

carlos jimenez
1294 valley rd wayne nj
Wayne, NJ 07470-2306

cmariojimenez@yahoo.com
201-696-0629

From: Melanie Stefania Pineda
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:55 AM

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Dear Executive Director David Fish,

My name is Melanie Stefania Pineda, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Melanie Stefania Pineda
618 E 1st Ave
Roselle, NJ 07203-1575

Melanie.pinedaq@gmail.com
908-922-6895

From: Paco Correa
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:55 AM

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Dear Executive Director David Fish,

My name is Paco Correa, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Paco Correa
18 Woodcrest Circle
Springfield, NJ 07081-1517

paco@pacovision.tv
973-842-1778

From: Lauren Crespo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:55 AM

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Dear Executive Director David Fish,

My name is Lauren Crespo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lauren Crespo
214 Sylvan Avenue
Galloway, NJ 08205-9652

lcrespo523@gmail.com
609-361-3388

From: John Zitani
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:55 AM

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Dear Executive Director David Fish,

My name is John Zitani, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

John Zitani
2221 Llewellyn Pkwy
Forked River, NJ 08731-3701

johnzitani@icloud.com
609-312-3522

From: Douglas Jones
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:55 AM

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

Report Suspicious

Dear Executive Director David Fish,

My name is Douglas Jones, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Douglas Jones
774 high mountain rd
North Haledon, NJ 07508-2722

Pzrdj69@gmail.com
973-493-5018

From: hassan elsharkawi
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:55 AM

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Dear Executive Director David Fish,

My name is hassan elsharkawi, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

hassan elsharkawi
34 Boylan Street
Newark, NJ 07106-1812

dexter.morgan2025@gmail.com
973-978-0892

From: ZHAMIL SEIDALIEV
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:55 AM

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Dear Executive Director David Fish,

My name is ZHAMIL SEIDALIEV, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

ZHAMIL SEIDALIEV
35 S WINDSOR AVE
Atlantic City, NJ 08401-5811

seidalievjamil781@gmail.com
609-515-5018

From: Merlyn Perdomo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:55 AM

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Dear Executive Director David Fish,

My name is Merlyn Perdomo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Merlyn Perdomo
212A Pompton ave
Cedar Grove, NJ 07009-2020

mperdomo868@gmail.com
973-704-5755

From: Anna Hedges
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:55 AM

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Dear Executive Director David Fish,

My name is Anna Hedges, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Anna Hedges
14 Church St
Sussex, NJ 07461-2106

Patnann2008@gmail.com
845-421-1219

From: Michelle Kreyling
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:55 AM

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Dear Executive Director David Fish,

My name is Michelle Kreyling, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michelle Kreyling
309 5th Street
Waretown, NJ 08758-2915

myflygrl@gmail.com
201-665-3868

From: Krystian Nowowiejski
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:56 AM

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Dear Executive Director David Fish,

My name is Krystian Nowowiejski, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Krystian Nowowiejski
325 Elizabeth Avenue
Toms River, NJ 08753-7123

krystiann13@hotmail.com
609-908-0225

From: Merlyn Perdomo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:56 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Merlyn Perdomo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Merlyn Perdomo
212A Pompton ave
Cedar Grove, NJ 07009-2020

mperdomo868@gmail.com
973-704-5755

From: Dominick Gray
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:56 AM

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Dear Executive Director David Fish,

My name is Dominick Gray, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dominick Gray
37 Grove Terrace
Irvington, NJ 07111-3819

dominickgray21@gmail.com
862-371-8555

From: Stephanie Miksza
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:56 AM

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Dear Executive Director David Fish,

My name is Stephanie Miksza, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Stephanie Miksza
72 locust grove Hazlet
Hazlet, NJ 07730-4144

stephaniemiksza@yahoo.com
832-516-5260

From: John Mozes
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:56 AM

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Dear Executive Director David Fish,

My name is Mozes, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

John Mozes
10 Shamrock Road, Lumberton, NJ
Lumberton, NJ 08048-5254

john.s.mozes@gmail.com
609-306-2309

From: Darrion Burch
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:57 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Darrion Burch, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Darrion Burch
17 Koster Blvd 5c
Edison, NJ 08837-4338

burch210@gmail.com
732-277-0416

From: danielle simon
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:57 AM

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Dear Executive Director David Fish,

My name is danielle simon, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

danielle simon
304 whildam ave north cape may
Cape May, NJ 08204-3154

dani_bee_29@yahoo.com
609-425-8813

From: Charles Riley
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:58 AM

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Dear Executive Director David Fish,

My name is Charles Riley , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Charles Riley
319 Crawford Ave
Maple Shade, NJ 08052-2703

Criley65@verizon.net
856-813-9018

From: LoriAnn Moskowitz
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:00:59 AM

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Dear Executive Director David Fish,

My name is LoriAnn Moskowitz , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

LoriAnn Moskowitz
122 Lexington Ct
Red Bank, NJ 07701-5476

worwor88@aol.com
917-979-0523

From: Christina Rosa
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:00 AM

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Dear Executive Director David Fish,

My name is Christina Rosa, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Christina Rosa
1 Riverview Drive, G12
South River, NJ 08882-1726

christina.rosa1981@yahoo.com
732-762-1117

From: Andrew Pancoast
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:01 AM

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Dear Executive Director David Fish,

My name is Andrew Pancoast, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Andrew Pancoast
2110 Mays Landing Rd, Trlr 5
Millville, NJ 08332-1172

andrew.pancoast@icloud.com
609-579-5334

From: Yairaniz Figueroa Ruiz
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:02 AM

This Message Is From an External Sender
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Dear Executive Director David Fish,

My name is Yairaniz Figueroa Ruiz , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Yairaniz Figueroa Ruiz
228 N Lincoln Ave
Long Branch, NJ 07740-4402

yairanizf28@gmail.com
732-688-2622

From: Stanley Blanc
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:02 AM

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Dear Executive Director David Fish,

My name is Stanley Blanc, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Stanley Blanc
916 S Fourth St
Camden, NJ 08103-2014

Blanc1kab@gmail.com
954-708-6960

From: Roland Ramirez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:02 AM

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Dear Executive Director David Fish,

My name is Roland Ramirez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Roland Ramirez
267 South 10th Street
Newark, NJ 07103-0167

nygfan866@gmail.com
862-221-2397

From: Hugo Chavez
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:01:14 AM

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Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

Trabajar con DoorDash como Dasher me permite acceder a un trabajo que se adapta a mi vida. Ser contratista independiente significa ser mi propio jefe. Puedo elegir cuándo, dónde y cómo trabajar, lo que me permite usar el dashing como mejor me funcione. Esta norma amenaza esa flexibilidad al restringir mi trabajo y dificultar que personas como yo elijan trabajar de forma independiente.

El dashing me permite obtener ingresos adicionales cuando los necesito, ya sean unas pocas horas a la semana o más. Si esta norma se aprueba, podría obligarme a trabajar bajo unas normas laborales rígidas que no me convienen. Tendría menos control sobre mi trabajo, lo que dificultaría obtener los ingresos adicionales de los que dependo.

Sé que la mayoría de los Dashers, incluyéndome a mí, queremos seguir siendo contratistas independientes. No queremos ser empleados. Esta norma podría quitarnos esa opción y obligarnos a una estructura laboral tradicional que no se ajusta a nuestra forma de trabajar ni a nuestra necesidad de ganar dinero. Es crucial que tengamos la libertad de decidir cómo trabajar, y esta norma podría quitárnosla.

Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Hugo Chavez
1312 27th Street
North Bergen, NJ 07047-2180
esponjoso013@gmail.com
551-327-9074

From: Usman Akologo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:16 AM

This Message Is From an External Sender
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Dear Executive Director David Fish,

My name is Usman Akologo , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Usman Akologo
62 West Barber Ave Woodbury NJ
Woodbury, NJ 08096-2306

mrakologo966@gmail.com
719-407-0317

From: Carl Flynn
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:16 AM

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Dear Executive Director David Fish,

My name is Carl Flynn, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Carl Flynn
2 Compton Road
Sussex, NJ 07461-2645

jay1979_2006@yahoo.com
973-534-1320

From: Susan I Lund
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:17 AM

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Dear Executive Director David Fish,

My name is Susan I , and I'm a Dasher and a concerned resident of New Jersey. I Lundwant to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Susan I Lund
2216 Adams Ave
Toms River, NJ 08753-6002

slund1231@gmail.com
848-333-2937

From: Elaine McCormick
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:17 AM

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Dear Executive Director David Fish,

My name is Elaine McCormick, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Elaine McCormick
3 Burton Way Apt508
Landing, NJ 07850-1134

lnymc712@aol.com
973-476-5872

From: Marie Abousamra
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:17 AM

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Dear Executive Director David Fish,

My name is Marie Abousamra, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Marie Abousamra
230 Anderson Street, # 3H
Hackensack, NJ 07601-3538

marieclaude75@aol.com
551-486-8800

From: Tarra Mosley
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:18 AM

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Dear Executive Director David Fish,

My name is Tarra Mosley, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Tarra Mosley
PO Box 519
Sicklerville, NJ 08081-0519

tarramosley@gmail.com
856-381-8092

From: Danielle Zambrano
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:19 AM

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Dear Executive Director David Fish,

My name is Danielle Zambrano, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Danielle Zambrano
4 Colonial Court
Barnegat, NJ 08005-1716

daniellemzambrano@gmail.com
609-879-1896

From: Ivan Chavez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:19 AM

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Dear Executive Director David Fish,

My name is Ivan Chavez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ivan Chavez
258 E 25TH ST
Paterson, NJ 07514-2232

riko136@hotmail.com
862-276-4277

From: Indira Grullon
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:19 AM

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Dear Executive Director David Fish,

My name is Indira Grullon, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Indira Grullon
157-159 Bellair Pl Floor 1
Newark, NJ 07104-1798

dirayami@gmail.com
732-801-1209

From: Tracey Coralluzzo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:19 AM

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Dear Executive Director David Fish,

My name is Tracey Coralluzzo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Tracey Coralluzzo
1400 West Wheat Rd
Vineland, NJ 08360-1927

tracey382006@yahoo.com
856-361-6434

From: Konstantin Pasechnikov
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:19 AM

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Dear Executive Director David Fish,

My name is Konstantin Pasechnikov, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Konstantin Pasechnikov
200 Dashew Dr Apt-D23
Suffern, NY 10901-4274

kdsa1@yandex.com
845-659-7489

From: Nasir Pinkney
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:20 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Nasir Pinkney, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Nasir Pinkney
516 Cypress Ave
Lindenwold, NJ 08021-1726

nasirpinkney111@gmail.com
856-688-5238

From: Louus Gannone
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:20 AM

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Dear Executive Director David Fish,

My name is Louus Gannone, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Louus Gannone
590 Vaughn ave
Forked River, NJ 08731-2223

mondscoowy@gmail.com
609-618-2507

From: Christian's. Thomas
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:20 AM

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

Report Suspicious

Dear Executive Director David Fish,

My name is Christian's. Thomas, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Christian's. Thomas
14 constitution rd
Sewell, NJ 08080-1736

christian11thomas@yahoo.com
609-519-0747

From: Aby Santy
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:20 AM

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Dear Executive Director David Fish,

My name is Aby Santy, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Aby Santy
70 Union Ave
Nutley, NJ 07110-5338

abima21@hotmail.com
718-715-3287

From: Joseph Oneill
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:20 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Joseph Oneill , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Joseph Oneill
32 Coolidge Ave
Parlin, NJ 08859-1511

Josephoneill49@hotmail.com
732-379-2827

From: Chris Wisniewski
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:20 AM

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Dear Executive Director David Fish,

My name is Chris Wisniewski, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Chris Wisniewski
47 Washington Ave
South Amboy, NJ 08879-2424

Cwis9@aol.com
732-309-8051

From: Abdurrahman Kurtulus
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:20 AM

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Dear Executive Director David Fish,

My name is Abdurrahman Kurtulus, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Abdurrahman Kurtulus
38 Victoria Dr
Somerset, NJ 08873-4611

akurtulus43@gmail.com
732-789-5450

From: Rosele Ortiz
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:20 AM

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Dear Executive Director David Fish,

My name is Rosele Ortiz, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rosele Ortiz
224 PENN AVE
Dover, NJ 07801-4831

rosele.ortiz@gmail.com
856-213-0660

From: Donna Vadino
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:21 AM

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Dear Executive Director David Fish,

My name is Donna Vadino, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Donna Vadino
254 Keller St
Bayville, NJ 08721-3566

tubba76@aol.com
848-333-8825

From: Dawn Tucker
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:21 AM

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Dear Executive Director David Fish,

My name is Dawn Tucker, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dawn Tucker
150 North Smith Terrace
Clementon, NJ 08021-4633

froggy1636@gmail.com
856-345-3894

From: Carlos Ospina
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:21 AM

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Dear Executive Director David Fish,

My name is Carlos Ospina, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Carlos Ospina
9313 Tallyho Rd, Apt 906
Houston, TX 77017-7071

Carlos-1994-2015@hotmail.com
786-362-4421

From: Tahmidul Islam
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:21 AM

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Dear Executive Director David Fish,

My name is Tahmidul Islam, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Tahmidul Islam
2834 Atlantic Avenue
Atlantic City, NJ 08401-6346

itahmidul9@gmail.com
609-992-4307

From: Damaris Santos
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:21 AM

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Dear Executive Director David Fish,

My name is Damaris Santos, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Damaris Santos
223B Garfield Ave
Collingswood, NJ 08108-3811

dsantos92406@icloud.com
856-993-2560

From: Roosevelt Geffrard
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:21 AM

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Dear Executive Director David Fish,

My name is Roosevelt Geffrard , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Roosevelt Geffrard
2392 Madison Avenue
Ewing, NJ 08638-3042

rooseveltgeffrard067@gmail.com
609-333-3350

From: Cheryl Smith
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:21 AM

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Dear Executive Director David Fish,

My name is Cheryl Smith , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Cheryl Smith
741 Edgar Rd
Elizabeth, NJ 07202-3125

cherbell921@gmail.com
908-249-5811

From: Scott Caloiaro
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:21 AM

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Dear Executive Director David Fish,

My name is Scott Caloiaro, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Scott Caloiaro
24 Richard Drive
Manahawkin, NJ 08050-4222

scottcaloiato@gmail.com
609-902-1075

From: David Strong
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:21 AM

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Dear Executive Director David Fish,

My name is David Strong, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

David Strong
63 elmwood road
Verona, NJ 07044-2503

strongd2004@yahoo.com
973-459-2317

From: Francis Boardley III
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:22 AM

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Dear Executive Director David Fish,

My name is Francis Boardley III, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Francis Boardley III
500 Delaware Ave
Palmyra, NJ 08065-1456

hoachnation@gmail.com
609-248-7483

From: Nicole Bachman
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:22 AM

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Dear Executive Director David Fish,

My name is Nicole Bachman, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Nicole Bachman
582 Sica Lane
Toms River, NJ 08753-8219

lunadora@icloud.com
908-477-0488

From: Elizabeth Milne
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:22 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Elizabeth Milne, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Elizabeth Milne
277 Baldwin St
Glen Ridge, NJ 07028-1533

emilne6012@gmail.com
973-460-3363

From: FELICIA BELL
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:22 AM

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Dear Executive Director David Fish,

My name is FELICIA BELL, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

FELICIA BELL
386 Lakehurst Road, 102B
Browns Mills, NJ 08015-6830

fkbell4@gmail.com
609-222-5251

From: Mehmet Aslangiri
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:22 AM

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Dear Executive Director David Fish,

My name is Mehmet Aslangiri, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Mehmet Aslangiri
2001 Grand Ave
North Bergen, NJ 07047-2037

mehmetaslam3403@outlook.com
347-592-8887

From: Aaron Dengler
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:22 AM

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Dear Executive Director David Fish,

My name is Aaron Dengler , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Aaron Dengler
85 east Delaware Avenue
Florence, NJ 08518-1601

aaronjohnnydengler@gmail.com
609-531-5287

From: Scott Lyons
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:22 AM

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Dear Executive Director David Fish,

My name is Scott Lyons, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Scott Lyons
11 Elaine Ct
Old Bridge, NJ 08857-1311

scotty22481@aol.com
732-995-5732

From: Jenifer Tarter
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:22 AM

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Dear Executive Director David Fish,

My name is Jenifer Tarter, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jenifer Tarter
895 Elton Adelphia Rd, 302
Freehold, NJ 07728-8662

jenifer7844@gmail.com
732-963-5472

From: Aysia Luna
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:23 AM

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Dear Executive Director David Fish,

My name is Aysia Luna, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Aysia Luna
19 Annette Ave
Hawthorne, NJ 07506-1221

aysialuna555@gmail.com
201-359-0407

From: Michelle Mazz
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:23 AM

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Dear Executive Director David Fish,

My name is Michelle Mazz, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michelle Mazz
592 washington st
Bound Brook, NJ 08805-1337

Mmazzagatti@gmail.com
908-295-3573

From: Carmelina Richard
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:23 AM

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Dear Executive Director David Fish,

My name is Carmelina Richard, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Carmelina Richard
28 Lynn Drive
Neptune, NJ 07753-3226

carmelinarichard@aol.com
908-309-8424

From: david tapia
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:23 AM

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Dear Executive Director David Fish,

My name is david tapia, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

david tapia
408 kennedy drive
Fairview, NJ 07022-1606

david.tapia@ymail.com
201-673-8924

From: Elisa Turse
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:23 AM

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Dear Executive Director David Fish,

My name is Elisa Turse, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Elisa Turse
1 Weldon Circle
Hainesport, NJ 08036-6254

eturse@aol.com
609-330-4109

From: Ignacio Morales
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:23 AM

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Dear Executive Director David Fish,

My name is Ignacio Morales, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ignacio Morales
155 Krone place
Hackensack, NJ 07601-3819

imorales@msn.com
973-460-5641

From: Anthony Toscano
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:23 AM

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Dear Executive Director David Fish,

My name is Anthony Toscano, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Anthony Toscano
17 Saratoga dr
Manalapan, NJ 07726-3319

stang062377@aol.com
732-492-3318

From: James Symbouras
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:23 AM

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Dear Executive Director David Fish,

My name is James Symbouras, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

James Symbouras
57 BRIDGEWATERS DRIVE, C/O JEANETTE PETTI
Oceanport, NJ 07757-1153

jsymbouras@gmail.com
347-359-0382

From: Amanda Mastropolo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:23 AM

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Dear Executive Director David Fish,

My name is Amanda Mastropolo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Amanda Mastropolo
174 Malone ave
Belleville, NJ 07109-2218

almrg18@gmail.com
732-491-9675

From: Juan Santos
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:01:24 AM

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Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

Trabajar con DoorDash como Dasher me permite acceder a un trabajo que se adapta a mi vida. Ser contratista independiente significa ser mi propio jefe. Puedo elegir cuándo, dónde y cómo trabajar, lo que me permite usar el dashing como mejor me funcione. Esta norma amenaza esa flexibilidad al restringir mi trabajo y dificultar que personas como yo elijan trabajar de forma independiente.

El dashing me permite obtener ingresos adicionales cuando los necesito, ya sean unas pocas horas a la semana o más. Si esta norma se aprueba, podría obligarme a trabajar bajo unas normas laborales rígidas que no me convienen. Tendría menos control sobre mi trabajo, lo que dificultaría obtener los ingresos adicionales de los que dependo.

Sé que la mayoría de los Dashers, incluyéndome a mí, queremos seguir siendo contratistas independientes. No queremos ser empleados. Esta norma podría quitarnos esa opción y obligarnos a una estructura laboral tradicional que no se ajusta a nuestra forma de trabajar ni a nuestra necesidad de ganar dinero. Es crucial que tengamos la libertad de decidir cómo trabajar, y esta norma podría quitárnosla.

Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Juan Santos
320 W Branch Ave. Apt. 2000E
Pine Hill, NJ 08021-6072
jpsr3x@gmail.com
540-255-2893

From: Margaret Cicardo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:24 AM

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Dear Executive Director David Fish,

My name is Margaret Cicardo , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Margaret Cicardo
302 Frances Dr
Lafayette, NJ 07848-4450

peggyfbc@hotmail.com
862-268-6244

From: John viterbo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:24 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is John viterbo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

John viterbo
12 Clover Way
Manchester Township, NJ 08759-5048

Johnviterbo4@gmail.com
929-421-8249

From: Ahmed Amety
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:24 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Ahmed Amety, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ahmed Amety
69 Dales Avenue apt1227
Jersey City, NJ 07306-6842

amer320@yahoo.com
551-229-5603

From: Courtney Henry
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:24 AM

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Dear Executive Director David Fish,

My name is Courtney Henry, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Courtney Henry
18 Cambridge Street Fl 1
East Orange, NJ 07018-1921

jah_t1@yahoo.com
516-309-9162

From: Christal Hardy
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:24 AM

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Dear Executive Director David Fish,

My name is Christal Hardy, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Christal Hardy
5 Marjoram Drive
Lumberton, NJ 08048-4214

Christalhardy7@gmail.com
215-680-2544

From: Anthony Toscano
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:24 AM

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Dear Executive Director David Fish,

My name is Anthony Toscano, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Anthony Toscano
17 Saratoga dr
Manalapan, NJ 07726-3319

stang062377@aol.com
732-492-3318

From: Chris Fareri
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:24 AM

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Dear Executive Director David Fish,

My name is Chris Fareri, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Chris Fareri
153 thornhill rd
Cherry Hill, NJ 08003-2258

cfareri31@yahoo.com
609-220-4233

From: Rogerio Caldeira
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:24 AM

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Dear Executive Director David Fish,

My name is Rogerio Caldeira, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rogerio Caldeira
392 Willow
Long Branch, NJ 07740-6025

rogerqc2000@hotmail.com
732-351-8449

From: Sergio Hernandez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:25 AM

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Dear Executive Director David Fish,

My name is Sergio Hernandez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sergio Hernandez
1521 39th Street
North Bergen, NJ 07047-2522

sjhm57@gmail.com
201-478-9034

From: Richard Crowley
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:25 AM

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Dear Executive Director David Fish,

My name is Richard Crowley, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Richard Crowley
37 Hilton rd Mount Holly
Mount Holly, NJ 08060-1135

rdc702@msn.com
609-287-1158

From: Brian Law
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:25 AM

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Dear Executive Director David Fish,

My name is Brian Law, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Brian Law
332 Washington Ave
West Berlin, NJ 08091-1227

blaw065@gmail.com
609-230-0135

From: Jean Green
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:25 AM

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Dear Executive Director David Fish,

My name is Jean Green, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jean Green
500 Broad St, Apt 8L
Keyport, NJ 07735-1638

seashoregirl05@aol.com
570-497-7498

From: Brandon Loja
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:25 AM

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Dear Executive Director David Fish,

My name is Brandon Loja, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Brandon Loja
2414 New York avenue
Union City, NJ 07087-4556

brandonloja@gmail.com
201-889-0436

From: Courtney Liss
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:25 AM

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Dear Executive Director David Fish,

My name is Courtney Liss, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Courtney Liss
2221 Llewellyn Parkway
Forked River, NJ 08731-3701

courtneyxliss@gmail.com
732-272-7619

From: Barbara Barrett
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:25 AM

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Dear Executive Director David Fish,

My name is Barbara Barrett, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Barbara Barrett
1 Decker Rd, Haskell, NJ
Haskell, NJ 07420-1027

bbar1122@optonline.net
201-774-8538

From: Frank Codispoti
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:25 AM

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Dear Executive Director David Fish,

My name is Frank Codispoti , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Frank Codispoti
20 leupp lane
Somerset, NJ 08873-2959

frankcod3288@gmail.com
646-296-1452

From: Shawn Glass
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:25 AM

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Dear Executive Director David Fish,

My name is Shawn Glass, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Shawn Glass
205 Pico Court
Mays Landing, NJ 08330-2224

sglassmail@gmail.com
609-204-0951

From: Robert Campos
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:25 AM

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Dear Executive Director David Fish,

My name is Robert Campos, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Robert Campos
565 Roosevelt Avenue
Carteret, NJ 07008-3074

rac28281973@yahoo.com
347-661-1510

From: Alvin Adams
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:26 AM

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Dear Executive Director David Fish,

My name is Alvin Adams, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Alvin Adams
185 Roseville Ave
Newark, NJ 07107-1618

alvinadams19@gmail.com
347-977-6469

From: Bill Bowler
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:26 AM

This Message Is From an External Sender
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Report Suspicious

Dear Executive Director David Fish,

My name is Bill Bowler, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Bill Bowler
83 Candlewood Dr
Mantua, NJ 08051-2124

bill.bowler@yahoo.com
609-870-7986

From: Michael Shaffer
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:26 AM

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Dear Executive Director David Fish,

My name is Michael Shaffer, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michael Shaffer
205 matey ave
Manahawkin, NJ 08050-2232

mikeymoves37@gmail.com
609-709-4442

From: Michele Hughes
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:26 AM

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Dear Executive Director David Fish,

My name is Michele Hughes, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michele Hughes
31 Twin Oaks Dr
Bridgeton, NJ 08302-7013

cusp-71turrets@icloud.com
856-405-5050

From: Helen Oneill
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:26 AM

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Dear Executive Director David Fish,

My name is Helen Oneill , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Helen Oneill
32 Coolidge Ave
Parlin, NJ 08859-1511

Matikka69@yahoo.com
908-565-1277

From: Adrian Kayle Dela Pena
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:26 AM

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Dear Executive Director David Fish,

My name is Adrian Kayle Dela Pena, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Adrian Kayle Dela Pena
278 main street
Little Ferry, NJ 07643-1301

kayledelapena@gmail.com
201-881-5767

From: Denamarie Keogh
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:26 AM

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Dear Executive Director David Fish,

My name is Denamarie Keogh, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Denamarie Keogh
386 Rittenhouse Ct
North Brunswick, NJ 08902-3533

dkeogh01@hotmail.com
732-354-5997

From: Holly Alemany
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:27 AM

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Dear Executive Director David Fish,

My name is Holly Alemany, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Holly Alemany
533 Lakeside Dr N
Forked River, NJ 08731-2303

Beaner12677@comcast.net
732-684-8147

From: Eric Jurovitsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:27 AM

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Dear Executive Director David Fish,

My name is Eric Jurovitsky, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Eric Jurovitsky
274 Chestnut Ridge Rd
Woodcliff Lake, NJ 07677-7738

eric.jurovitsky@gmail.com
609-602-8950

From: Courtney Henry
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:27 AM

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Dear Executive Director David Fish,

My name is Courtney Henry, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Courtney Henry
18 Cambridge Street Fl 1
East Orange, NJ 07018-1921

jah_t1@yahoo.com
516-309-9162

From: Lizette Horton
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:27 AM

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Dear Executive Director David Fish,

My name is Lizette Horton, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lizette Horton
4104 Oak Rd.
Buena, NJ 08310-1516

Lizettehorton@yahoo.com
609-289-0399

From: Naba Khatiwada
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:27 AM

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Dear Executive Director David Fish,

My name is Naba Khatiwada, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Naba Khatiwada
7 Londonderry Dr
Flemington, NJ 08822-1802

nabaraj.sir@gmail.com
909-681-8643

From: Darlyne Samuel
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:28 AM

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Dear Executive Director David Fish,

My name is Darlyne Samuel, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Darlyne Samuel
720 South St Elizabeth
Elizabeth, NJ 07202-3406

darlyne.cantave2@gmail.com
713-909-9403

From: Ashley Coates
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:28 AM

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Dear Executive Director David Fish,

My name is Ashley Coates, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ashley Coates
25 Old Brookville Rd
Barnegat, NJ 08005-1293

acoates1593@yahoo.com
609-276-7818

From: Yessika Pichardo
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:01:28 AM

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Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

Trabajar con DoorDash como Dasher me permite acceder a un trabajo que se adapta a mi vida. Ser contratista independiente significa ser mi propio jefe. Puedo elegir cuándo, dónde y cómo trabajar, lo que me permite usar el dashing como mejor me funcione. Esta norma amenaza esa flexibilidad al restringir mi trabajo y dificultar que personas como yo elijan trabajar de forma independiente.

El dashing me permite obtener ingresos adicionales cuando los necesito, ya sean unas pocas horas a la semana o más. Si esta norma se aprueba, podría obligarme a trabajar bajo unas normas laborales rígidas que no me convienen. Tendría menos control sobre mi trabajo, lo que dificultaría obtener los ingresos adicionales de los que dependo.

Sé que la mayoría de los Dashers, incluyéndome a mí, queremos seguir siendo contratistas independientes. No queremos ser empleados. Esta norma podría quitarnos esa opción y obligarnos a una estructura laboral tradicional que no se ajusta a nuestra forma de trabajar ni a nuestra necesidad de ganar dinero. Es crucial que tengamos la libertad de decidir cómo trabajar, y esta norma podría quitárnosla.

Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Yessika Pichardo
454 e 27 th st
Paterson, NJ 07514-1814
mery235647@gmail.com
347-812-2321

From: Joseph Carangui
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:28 AM

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Dear Executive Director David Fish,

My name is Joseph Carangui, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Joseph Carangui
210 14th St
Wood Ridge, NJ 07075-1428

jisrael2001@icloud.com
201-968-8803

From: Frederick Cramer
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:29 AM

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Dear Executive Director David Fish,

My name is Frederick Cramer, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Frederick Cramer
2700 Moore Ave
Point Pleasant Boro, NJ 08742-3523

freddycram1977@gmail.com
732-258-6492

From: Jennifer Loesch
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:29 AM

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Dear Executive Director David Fish,

My name is Jennifer Loesch, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jennifer Loesch
26 English lane
Brick, NJ 08724-2066

jenniferloesch921@gmail.com
732-822-6514

From: Brian Hampton
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:29 AM

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Dear Executive Director David Fish,

My name is Brian Hampton, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Brian Hampton
4314 Bloomingdale Dr
Hillsborough, NJ 08844-5556

hamwhoham@yahoo.com
908-397-3227

From: Sean F
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:29 AM

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

Report Suspicious

Dear Executive Director David Fish,

My name is Sean F, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sean F
92 Main
Keyport, NJ 07735-1259

SeanFel86@gmail.com
732-275-4394

From: Anthony Salvatico
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:29 AM

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Dear Executive Director David Fish,

My name is Anthony Salvatico, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Anthony Salvatico
420 N Broadway Apt 17
Pitman, NJ 08071-1049

asalva02@verizon.net
856-275-5058

From: Dianna Dressler
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:30 AM

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Dear Executive Director David Fish,

My name is Dianna Dressler, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dianna Dressler
94 Raritan Ave keansburg nj 07734
Keansburg, NJ 07734-1269

diannaphillips19@gmail.vom
732-300-6297

From: Niree Drakeford
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:30 AM

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Dear Executive Director David Fish,

My name is Niree Drakeford , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Niree Drakeford
111 Lincoln Ave Apt 2c Newark NJ
Newark, NJ 07104-4605

nireedrakeford2@gmail.com
862-424-0116

From: Destiny Constantino
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:30 AM

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Dear Executive Director David Fish,

My name is Destiny Constantino, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Destiny Constantino
1201 N Main Street apt 38
Pleasantville, NJ 08232-1094

dcblazers6@gmail.com
609-327-0246

From: LuAnne McCardell
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:30 AM

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Dear Executive Director David Fish,

My name is LuAnne McCardell, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

LuAnne McCardell
729 Harbor Ave
Mays Landing, NJ 08330-3811

hope42504@outlook.com
609-705-8805

From: Bernadette Grabert
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:31 AM

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Dear Executive Director David Fish,

My name is Bernadette Grabert, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Bernadette Grabert
315 Washington Ave
West Berlin, NJ 08091-1219

grabert315@comcast.net
856-767-9378

From: William Bonilla
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:31 AM

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Dear Executive Director David Fish,

My name is William Bonilla, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

William Bonilla
2138 Aldrin rd Apt 1A, Ocean, NJ
Ocean, NJ 07712-2442

wbonilla@steu.edu
732-245-6214

From: David Leifer
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:31 AM

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Dear Executive Director David Fish,

My name is David Leifer, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

David Leifer
2415 Hunters Glen Drive
Plainsboro, NJ 08536-3865

pianoleif@aol.com
609-731-5521

From: Berrisford BURKE
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:31 AM

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Dear Executive Director David Fish,

My name is Berrisford BURKE, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Berrisford BURKE
190 County Road Apt A, APT A
Tenafly, NJ 07670-1867

berrisfordburke@gmail.com
201-496-8704

From: Laure Cicero
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:32 AM

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Dear Executive Director David Fish,

My name is Laure Cicero, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Laure Cicero
49 Burton dr
Howell, NJ 07731-2708

laurencicero@gmail.com
646-258-1666

From: Scott Emery
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:32 AM

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Dear Executive Director David Fish,

My name is Scott Emery, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Scott Emery
1603 Highmeadow Drive Point Pleasant Nj 08742
Point Pleasant Boro, NJ 08742-4216

senery25@icloud.com
732-600-2949

From: Margaret Cicardo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:32 AM

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Dear Executive Director David Fish,

My name is Margaret Cicardo , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Margaret Cicardo
302 Frances Dr
Lafayette, NJ 07848-4450

peggyfbc@hotmail.com
862-268-6244

From: Donna Gwiazdowski
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:32 AM

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Dear Executive Director David Fish,

My name is Donna Gwiazdowski , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Donna Gwiazdowski
232 Doolan Road
Dingmans Ferry, PA 18328-9668

donnafive72@gmail.com
732-754-4313

From: Joseph Gardi
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:32 AM

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Dear Executive Director David Fish,

My name is Joseph Gardi, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Joseph Gardi
47 George st
Newark, NJ 07105-5485

joeythebull1@yahoo.com
609-498-2387

From: Carlos Cano
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:33 AM

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Dear Executive Director David Fish,

My name is Carlos Cano, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Carlos Cano
55 Canal St
Raritan, NJ 08869-2023

canoc21@gmail.com
551-580-3120

From: Martin Zirlin
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:34 AM

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Dear Executive Director David Fish,

My name is Martin Zirlin, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Martin Zirlin
31 peters lane, C 11
Blackwood, NJ 08012-4647

zirlin@gmail.com
856-254-9118

From: Casey Hintennach
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:34 AM

This Message Is From an External Sender
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Report Suspicious

Dear Executive Director David Fish,

My name is Casey Hintennach, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Casey Hintennach
8 Edgewater Dr
Matawan, NJ 07747-3008

kaybanger77@gmail.com
732-520-9891

From: Michael Bonanno
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:34 AM

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Dear Executive Director David Fish,

My name is Michael Bonanno, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michael Bonanno
216 Maurice Street
Millville, NJ 08332-4112

mjn19781@yahoo.com
856-500-0765

From: Sheryl Katowich
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:34 AM

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Dear Executive Director David Fish,

My name is Sheryl Katowich, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sheryl Katowich
151 Morris Ave Apt 316
South Plainfield, NJ 07080-4749

shekat67@gmail.com
908-546-2079

From: Dina Alachan
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:35 AM

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Dear Executive Director David Fish,

My name is Dina Alachan, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dina Alachan
1081 Oakland Avenue
Plainfield, NJ 07060-3411

alachan97@gmail.com
908-367-8289

From: Bernard Stelacone
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:35 AM

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Dear Executive Director David Fish,

My name is Bernard Stelacone, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Bernard Stelacone
1 Grant circle
Sewell, NJ 08080-2618

b_stelacone@yahoo.com
609-315-9204

From: Lourdes Garcia
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:35 AM

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Dear Executive Director David Fish,

My name is Lourdes Garcia , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lourdes Garcia
186 Edgewood drive
Toms River, NJ 08755-7352

louloubernadette75@gmail.com
732-644-0528

From: Matt McKeown
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:36 AM

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Dear Executive Director David Fish,

My name is Matt McKeown, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Matt McKeown
410 Red Bank Ave
West Deptford, NJ 08096-1452

mattymix8@yahoo.com
856-979-6370

From: Andrea Ginnelly
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:37 AM

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Dear Executive Director David Fish,

My name is Andrea Ginnelly, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Andrea Ginnelly
606 Barbara Road
Landing, NJ 07850-1404

andrea7948@aol.com
973-610-5009

From: Luis Estevez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:37 AM

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Dear Executive Director David Fish,

My name is Luis Estevez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Luis Estevez
15 E Charles St
Nanuet, NY 10954-3005

lou34@ymail.com
917-418-0519

From: LARISSA FUZIA
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:38 AM

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This message came from outside your organization.

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Dear Executive Director David Fish,

My name is LARISSA FUZIA, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

LARISSA FUZIA
72 N MOUNT LEBANON RD
Port Murray, NJ 07865-3101

Larissa.fuzia@yahoo.com
732-895-1645

From: Cerise Santos-Heredia
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:38 AM

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Dear Executive Director David Fish,

My name is Cerise Santos-Heredia, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Cerise Santos-Heredia
14875 SE 25TH AVE Starke,FL
Starke, FL 32091-4352

cerisesantosheredia@gmail.com
689-323-4667

From: Ralph Devone
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:40 AM

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Dear Executive Director David Fish,

My name is Ralph Devone, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ralph Devone
41 West Francis St
Iselin, NJ 08830-1152

Ralph.devone@yahoo.com
732-354-7441

From: Anthony Aviles
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:41 AM

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Dear Executive Director David Fish,

My name is Anthony Aviles, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Anthony Aviles
58 Pacific Ave
North Middletown, NJ 07748-5758

tonyrome617@aol.com
732-693-5612

From: Lory Martinez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:43 AM

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Dear Executive Director David Fish,

My name is Lory Martinez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lory Martinez
736 Lindegar St
Linden, NJ 07036-5754

lorym07@gmail.com
201-702-8841

From: Danielle Cohen
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:43 AM

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Dear Executive Director David Fish,

My name is Danielle Cohen, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Danielle Cohen
590 Vaughn Ave forked river nj
Forked River, NJ 08731-2223

daniellecohen28@gmail.com
609-618-2950

From: Vinod Bojja
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:44 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Vinod Bojja, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Vinod Bojja
41 State st glassboro
Glassboro, NJ 08028-1905

vinodkvb59@gmail.com
856-226-1055

From: David Harbert
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:45 AM

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Dear Executive Director David Fish,

My name is David Harbert, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

David Harbert
9 Homestead Rd
Stratford, NJ 08084-1610

dlh19611@msn.com
856-938-4335

From: Alfredo Ferreira
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:45 AM

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Dear Executive Director David Fish,

My name is Alfredo Ferreira, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Alfredo Ferreira
535 dauphin st
Riverside, NJ 08075-3439

slbport@gmail.com
267-242-1554

From: Jon Kennedy
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:46 AM

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

Report Suspicious

Dear Executive Director David Fish,

My name is Jon Kennedy, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jon Kennedy
131 Alpine Trail
Sparta, NJ 07871-1405

koifaminto@icloud.com
917-444-3354

From: Kathleen Benningfield
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:46 AM

This Message Is From an External Sender
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Report Suspicious

Dear Executive Director David Fish,

My name is Kathleen Benningfield, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Kathleen Benningfield
900 Barnegat Blvd N Unit 1100
Barnegat, NJ 08005-2573

copper1126@hotmail.com
609-879-9715

From: Kenneth Jefferson
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:47 AM

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

Report Suspicious

Dear Executive Director David Fish,

My name is Kenneth Jefferson, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Kenneth Jefferson
144 N Broadway B
Pennsville, NJ 08070-1647

kayspace1990@yahoo.com
856-777-6109

From: Petter Bebawi
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:47 AM

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

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Dear Executive Director David Fish,

My name is Petter Bebawi , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Petter Bebawi
254 Sunset ave
Old Bridge, NJ 08857-1117

pettergege@yahoo.com
201-682-6229

From: Juan Mejias
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:47 AM

This Message Is From an External Sender
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Report Suspicious

Dear Executive Director David Fish,

My name is Juan Mejias, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Juan Mejias
502 Glider Ave
Berlin, NJ 08009-9346

trucker0810@yahoo.com
609-727-9594

From: Lawonnda Carter
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:48 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Lawonnda Carter, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lawonnda Carter
904 Buck St
Millville, NJ 08332-3702

lawonndacarter@gmail.com
856-265-5474

From: Steven Rivera
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:50 AM

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Dear Executive Director David Fish,

My name is Steven Rivera, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Steven Rivera
315 martin luther king jr dr
Jersey City, NJ 07305-5537

chaos82chaos@yahoo.com
201-920-5766

From: Michelle Barlow
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:50 AM

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Dear Executive Director David Fish,

My name is Michelle Barlow, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michelle Barlow
9 Hartwick Dr, 320
Skillman, NJ 08558-1836

michellebarlow82@yahoo.com
609-510-6606

From: Dennis Simon
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:51 AM

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This message came from outside your organization.

Report Suspicious

Dear Executive Director David Fish,

My name is Dennis Simon, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dennis Simon
10 Fawnridge Drive
Long Valley, NJ 07853-3247

ddsimon80@yahoo.com
201-522-7293

From: Francisca Kourasis
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:51 AM

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Dear Executive Director David Fish,

My name is Francisca Kourasis , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Francisca Kourasis
12 Sanford Place
Jersey City, NJ 07307-3829

fkourasis7@gmail.com
201-577-6205

From: Janice Luster
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:51 AM

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Dear Executive Director David Fish,

My name is Janice Luster, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Janice Luster
2 Woodbridge Ave
Highland Park, NJ 08904-3235

lusterjanice53@yahoo.com
908-374-9216

From: Christina Schoener
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:52 AM

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Dear Executive Director David Fish,

My name is Christina Schoener, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Christina Schoener
20 Cape Cod Dr.
Blackwood, NJ 08012-2506

schoenerpsu@gmail.com
856-228-9202

From: Christina Schreiber
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:52 AM

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Dear Executive Director David Fish,

My name is Schreiber, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Christina Schreiber
11 Avenue B
Keansburg, NJ 07734-3281

lilbith78@aol.com
732-207-9668

From: Jennifer Saber
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:53 AM

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Dear Executive Director David Fish,

My name is Jennifer Saber, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jennifer Saber
31 Tuthill Ct
Sayreville, NJ 08872-2710

jsulli14@gmail.com
732-742-9573

From: Steven Sanders
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:54 AM

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This message came from outside your organization.

Report Suspicious

Dear Executive Director David Fish,

My name is Steven Sanders, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Steven Sanders
2 Evergreen Rd
Somerset, NJ 08873-2822

sjborn87@gmail.com
732-322-0025

From: Sade Lucas
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:57 AM

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This message came from outside your organization.

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Dear Executive Director David Fish,

My name is Sade Lucas, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sade Lucas
46k reading road
Edison, NJ 08817-2181

sadelucas20@gmail.com
908-256-6346

From: Davia Ashman
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:57 AM

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Dear Executive Director David Fish,

My name is Davia Ashman, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Davia Ashman
21 millstone lane
Willingboro, NJ 08046-2918

rihannawork100@gmail.com
609-427-2805

From: Anthony Byers
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:01:59 AM

This Message Is From an External Sender
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Report Suspicious

Dear Executive Director David Fish,

My name is Anthony Byers, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Anthony Byers
535-537 New Brunswick, 113
Fords, NJ 08863-2131

abyers315@gmail.com
908-217-0114

From: Riccardo Amato
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:00 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Riccardo Amato, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Riccardo Amato
2097 Franklin Drive
Vineland, NJ 08361-8548

protovsi@gmail.com
856-484-7481

From: Jason Adams
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:01 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Jason Adams, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jason Adams
2704 Shetland Way
Westville, NJ 08093-1543

jay.hp524@gmail.com
609-314-6723

From: Virginia Kindig
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:08 AM

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Dear Executive Director David Fish,

My name is Virginia Kindig, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Virginia Kindig
191 US HIGHWAY 9 TRLR 1
Englishtown, NJ 07726-9201

vkindig@gmail.com
848-525-4459

From: Tracey Coralluzzo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:10 AM

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Dear Executive Director David Fish,

My name is Tracey Coralluzzo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Tracey Coralluzzo
1400 West Wheat Rd
Vineland, NJ 08360-1927

tracey382006@yahoo.com
856-361-6434

From: Michael Newell
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:11 AM

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This message came from outside your organization.

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Dear Executive Director David Fish,

My name is Michael Newell, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michael Newell
782 STAFFORD AVE
Staten Island, NY 10309-2336

mnewell26x@gmail.com
646-335-7132

From: Tyrah Hopkins
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:12 AM

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Dear Executive Director David Fish,

My name is Tyrah Hopkins, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Tyrah Hopkins
164 N Day St
Orange, NJ 07050-3669

tyrahlhop9@gmail.com
862-276-7820

From: David Kowalsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:14 AM

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Dear Executive Director David Fish,

My name is David Kowalsky, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

David Kowalsky
3406 Shetland Way
Westville, NJ 08093-1554

Crzydave912@msn.com
609-313-5566

From: Douglas Pickell
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:15 AM

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This message came from outside your organization.

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Dear Executive Director David Fish,

My name is Douglas Pickell, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Douglas Pickell
405 17th Ave Brick NJ
Brick, NJ 08724-2601

djpickell@comcast.net
732-278-6005

From: Carmela McDonough
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:17 AM

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Dear Executive Director David Fish,

My name is Carmela McDonough, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Carmela McDonough
221 Great Road
Maple Shade, NJ 08052-3044

CARMELAM0769@AOL.COM
609-462-0815

From: Thomas Green
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:17 AM

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This message came from outside your organization.

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Dear Executive Director David Fish,

My name is Thomas Green, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Thomas Green
4071 Harbour Dr
Palmyra, NJ 08065-2115

bgumpg.g@gmail.com
856-533-8335

From: Yesenia Parada
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:17 AM

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Dear Executive Director David Fish,

My name is Yesenia Parada, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Yesenia Parada
534 East Front Street
Plainfield, NJ 07060-1470

paradayesenia92@gmail.com
908-548-5261

From: DAVID CARNEY
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:17 AM

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Dear Executive Director David Fish,

My name is DAVID CARNEY, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

DAVID CARNEY
8 Texas Ave
Monmouth Junction, NJ 08852-3347

carneydavid22@gmail.com
609-212-6386

From: Luichy Andino
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:18 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Luichy Andino, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Luichy Andino
4606 Park Ave
Weehawken, NJ 07086-7132

luichyandino@gmail.com
201-951-0156

From: Ashley Belinsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:18 AM

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This message came from outside your organization.

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Dear Executive Director David Fish,

My name is Ashley Belinsky, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ashley Belinsky
22 Wausau St
Ogdensburg, NJ 07439-1134

ashleybelinsky30@gmail.com
732-754-7299

From: Sean Hallman
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:19 AM

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This message came from outside your organization.

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Dear Executive Director David Fish,

My name is Sean Hallman, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sean Hallman
212 Marlin Road
Absecon, NJ 08201-2508

sbh718@icloud.com
747-333-9147

From: Sean Meara
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:19 AM

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This message came from outside your organization.

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Dear Executive Director David Fish,

My name is Meara, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sean Meara
1807 Orchard Ave
Trenton, NJ 08610-3213

sjmeara@aol.com
609-658-8989

From: Enrique Cruz
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:02:19 AM

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Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

Trabajar con DoorDash como Dasher me permite acceder a un trabajo que se adapta a mi vida. Ser contratista independiente significa ser mi propio jefe. Puedo elegir cuándo, dónde y cómo trabajar, lo que me permite usar el dashing como mejor me funcione. Esta norma amenaza esa flexibilidad al restringir mi trabajo y dificultar que personas como yo elijan trabajar de forma independiente.

El dashing me permite obtener ingresos adicionales cuando los necesito, ya sean unas pocas horas a la semana o más. Si esta norma se aprueba, podría obligarme a trabajar bajo unas normas laborales rígidas que no me convienen. Tendría menos control sobre mi trabajo, lo que dificultaría obtener los ingresos adicionales de los que dependo.

Sé que la mayoría de los Dashers, incluyéndome a mí, queremos seguir siendo contratistas independientes. No queremos ser empleados. Esta norma podría quitarnos esa opción y obligarnos a una estructura laboral tradicional que no se ajusta a nuestra forma de trabajar ni a nuestra necesidad de ganar dinero. Es crucial que tengamos la libertad de decidir cómo trabajar, y esta norma podría quitárnosla.

Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Enrique Cruz
1501 Roosevelt Ave Trlr N8, Carteret, NJ
Carteret, NJ 07008-1443
enriqecruz@gmail.com
646-648-9458

From: Jennifer Luerssen
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:19 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Jennifer Luerssen, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jennifer Luerssen
25 Madison Ave
Fanwood, NJ 07023-1049

jluerssen@gmail.com
415-756-9288

From: Yasser Hussain
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:19 AM

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Dear Executive Director David Fish,

My name is Yasser Hussain, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Yasser Hussain
330 W Malaga Rd, Williamstown 08094
Williamstown, NJ 08094-3837

reikimaster2005@aol.com
603-996-1154

From: Matthew McMullen
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:20 AM

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Dear Executive Director David Fish,

My name is Matthew McMullen , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Matthew McMullen
225 Kennedy Ave
Williamstown, NJ 08094-5441

Johncenafan1982@gmail.com
856-237-3636

From: SAMUEL LOPEZ
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:20 AM

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Dear Executive Director David Fish,

My name is SAMUEL LOPEZ, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

SAMUEL LOPEZ
109 Port Elizabeth-Cumberland Road
Millville, NJ 08332-8856

Libralopez77@gmail.com
941-301-9052

From: Michael Williams
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:20 AM

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Dear Executive Director David Fish,

My name is Michael Williams, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michael Williams
97 Sowers Dr
Hackettstown, NJ 07840-7625

billydee53@hotmail.com
973-876-7516

From: Rickie Lucas
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:21 AM

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Dear Executive Director David Fish,

My name is Rickie Lucas , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rickie Lucas
136Manhattan ave
Jersey City, NJ 07307-3815

lucas.rickie@hotmail.com
862-754-8436

From: Rickie Lucas
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:21 AM

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Dear Executive Director David Fish,

My name is [@advFirst] [@advLast], and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rickie Lucas
136Manhattan ave
Jersey City, NJ 07307-3815

lucas.rickie@hotmail.com
862-754-8436

From: Gabriela Claros
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:21 AM

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Dear Executive Director David Fish,

My name is Gabriela Claros, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Gabriela Claros
18 Fulton St
Montclair, NJ 07042-4559

yclaros88@hotmail.com
551-358-6920

From: Latiya Sanabria
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:21 AM

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Dear Executive Director David Fish,

My name is Latiya Sanabria , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Latiya Sanabria
231 great rd
Maple Shade, NJ 08052-3044

tiyasanabria@gmail.com
856-562-6246

From: Matthew Carides
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:21 AM

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Dear Executive Director David Fish,

My name is Matthew Carides , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Matthew Carides
33 village green rd Bedminster NJ
Bedminster, NJ 07921-1504

mattcamero68@gmail.com
908-635-1897

From: Lora Williams
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:21 AM

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Dear Executive Director David Fish,

My name is Lora Williams , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lora Williams
16 Plymouth Dr Toms River, NJ
Toms River, NJ 08757-6522

lojohnson46@gmail.com
732-908-9848

From: Faiad Aliiev
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:23 AM

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Dear Executive Director David Fish,

My name is Faiad Aliiev, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Faiad Aliiev
28 Reids Hill RD
Morganville, NJ 07751-4222

Alievfayad@gmail.com
908-415-8543

From: Debbie Van Winkle
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:23 AM

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Dear Executive Director David Fish,

My name is Debbie Van Winkle , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Debbie Van Winkle
3306 Limestone Way
Mount Laurel, NJ 08054-6241

debsgibbs@gmail.com
609-694-3004

From: Liton Rudra
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:23 AM

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Dear Executive Director David Fish,

My name is Liton Rudra , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Liton Rudra
46 Cambridge Rd
Kendall Park, NJ 08824-1233

lrudra13@gmail.com
201-687-4179

From: Michael Hernandez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:23 AM

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Dear Executive Director David Fish,

My name is Michael Hernandez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michael Hernandez
123 Madison Ave
Rochelle Park, NJ 07662-4334

dashing70x7@gmail.com
551-427-2626

From: Wilfred Aberin
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:23 AM

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Dear Executive Director David Fish,

My name is Wilfred Aberin, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Wilfred Aberin
29 Veterans dr
South River, NJ 08882-2614

faberin16@yahoo.com
732-586-6069

From: Ricardo Salazar
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:02:23 AM

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Report Suspicious

Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

Trabajar con DoorDash como Dasher me permite acceder a un trabajo que se adapta a mi vida. Ser contratista independiente significa ser mi propio jefe. Puedo elegir cuándo, dónde y cómo trabajar, lo que me permite usar el dashing como mejor me funcione. Esta norma amenaza esa flexibilidad al restringir mi trabajo y dificultar que personas como yo elijan trabajar de forma independiente.

El dashing me permite obtener ingresos adicionales cuando los necesito, ya sean unas pocas horas a la semana o más. Si esta norma se aprueba, podría obligarme a trabajar bajo unas normas laborales rígidas que no me convienen. Tendría menos control sobre mi trabajo, lo que dificultaría obtener los ingresos adicionales de los que dependo.

Sé que la mayoría de los Dashers, incluyéndome a mí, queremos seguir siendo contratistas independientes. No queremos ser empleados. Esta norma podría quitarnos esa opción y obligarnos a una estructura laboral tradicional que no se ajusta a nuestra forma de trabajar ni a nuestra necesidad de ganar dinero. Es crucial que tengamos la libertad de decidir cómo trabajar, y esta norma podría quitárnosla.

Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Ricardo Salazar
133 Pershing Ave Iselin nj
Iselin, NJ 08830-1455
mavaisalazar57@gmail.com
732-609-0940

From: Dan Farrell
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:23 AM

This Message Is From an External Sender
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Report Suspicious

Dear Executive Director David Fish,

My name is Dan Farrell , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dan Farrell
72 Sleepy Hollow Rd
Byram Township, NJ 07821-3325

dmfarrell815@comcast.net
215-262-9978

From: Raphael Beldor
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:24 AM

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Dear Executive Director David Fish,

My name is Raphael Beldor , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Raphael Beldor
253 Amherst street
East Orange, NJ 07018-2506

raphaelbeldor@yahoo.com
646-836-1960

From: Raymond Hand
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:24 AM

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Dear Executive Director David Fish,

My name is Raymond Hand, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Raymond Hand
1338 Washington Ave floor 1
West Deptford, NJ 08096-1036

myhands4@yahoo.com
609-325-8211

From: Lia Hamilton
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:24 AM

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Dear Executive Director David Fish,

My name is Lia Hamilton, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lia Hamilton
330 Haines Avenue
Barrington, NJ 08007-1043

jaded3551@gmail.com
856-955-3267

From: Rob Schmidt
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:24 AM

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Dear Executive Director David Fish,

My name is Rob Schmidt, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rob Schmidt
31 Stafford Ave Manahawkin NJ
Manahawkin, NJ 08050-3151

robbyschmidt@comcast.net
609-290-8667

From: John O"Hara
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:24 AM

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Dear Executive Director David Fish,

My name is John O'Hara, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

John O'Hara
115 Old Short Hills Rd Apt 417
West Orange, NJ 07052-1039

johara287@gmail.com
973-493-2455

From: Emad Hermina
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:25 AM

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Dear Executive Director David Fish,

My name is Emad Hermina , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Emad Hermina
115 Old Queens blvd
Manalapan, NJ 07726-3519

e.hermina@hotmail.com
917-818-9756

From: Felicia Teabout
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:25 AM

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Dear Executive Director David Fish,

My name is Felicia Teabout, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Felicia Teabout
207 Pennington St.
Newark, NJ 07105-1026

teabout87@aol.com
862-846-1287

From: Michael Mudrak
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:25 AM

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Dear Executive Director David Fish,

My name is Michael Mudrak , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michael Mudrak
81 Hermann Ave
Carteret, NJ 07008-2236

michaelmudrak@ymail.com
212-470-0725

From: Rahat Patel
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:25 AM

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Dear Executive Director David Fish,

My name is Rahat Patel, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rahat Patel
201 Homestead Rd
Hillsborough, NJ 08844-1907

rahatipat@gmail.com
732-427-1781

From: Lee Matt
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:25 AM

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Dear Executive Director David Fish,

My name is Lee Matt, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lee Matt
200 Oxford Rd,
Colonia, NJ 07067-1021

lmm479@aol.com
732-634-4450

From: Rustina Chin
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:25 AM

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Dear Executive Director David Fish,

My name is Rustina Chin, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rustina Chin
341Plainfield ave
Edison, NJ 08817-3118

rustinachin732@gmail.com
732-277-7587

From: Rahul Thakur
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:25 AM

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Dear Executive Director David Fish,

My name is Rahul Thakur, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rahul Thakur
27 hillcrest lane
Little Egg Harbor Twp, NJ 08087-3325

jrfoodhub@gmail.com
732-895-0789

From: Christian Lloyd
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:25 AM

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Dear Executive Director David Fish,

My name is Christian Lloyd, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Christian Lloyd
4 taft court
Princeton, NJ 08540-1661

coachcgl@lloydhealthrevolution.com
201-320-4952

From: Julie Asuncion
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Julie Asuncion, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Julie Asuncion
732 ocean ave
Long Branch, NJ 07740-4970

officialjulie2@gmail.com
732-822-3127

From: Jeffrey Grullon
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Jeffrey Grullon, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jeffrey Grullon
157-159 Bellair pl, Newark, NJ
Newark, NJ 07104-1798

jgrullon11@gmail.com
929-227-8345

From: Pedro Barcelo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Pedro Barcelo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Pedro Barcelo
458 North 5th Street, 2nd Floor
Newark, NJ 07107-3927

pbarcelo@eastshoremodern.com
862-371-4859

From: Debbie Silver
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Debbie Silver, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Debbie Silver
5 St Pierri Ct
Toms River, NJ 08757-4030

38_workers.grabby@icloud.com
908-963-1613

From: Thomas Crossan
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Thomas Crossan, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Thomas Crossan
28 Glen oak drive
Middletown, NJ 07748-2235

thomas.crossan@verizon.net
732-610-0115

From: Lawrence Henry
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Lawrence Henry , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lawrence Henry
46 Meadowrue Ct
Mount Laurel, NJ 08054-2524

lhenry@gmail.com
609-694-2258

From: Daniel Bender
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Daniel Bender, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Daniel Bender
461 Mohawk Drive
Brick, NJ 08723-8018

dbend06@yahoo.com
848-992-2348

From: Jackeline Berrios
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Jackeline Berrios, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jackeline Berrios
21 4th Avenue
Chesilhurst, NJ 08089-1044

jackieberrios@yahoo.com
856-520-0408

From: Muhammad Azan Pervaiz
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Muhammad Azan Pervaiz, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Muhammad Azan Pervaiz
401 US HIGHWAY 22
North Plainfield, NJ 07060-3805

muhammadazanpervaiz1@gmail.com
973-796-8977

From: Angel Torres Correa
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Angel Torres Correa, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Angel Torres Correa
104 26th Ave
Monroeville, NJ 08343-2642

angie_torres_correa@yahoo.com
856-504-4709

From: Janet Sanchez
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Janet Sanchez, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Janet Sanchez
91 High Street
Ogdensburg, NJ 07439-1247

jsanchez309@hotmail.com
908-662-4161

From: Angie S
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Angie S, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Angie S
68 Elliott St
Newark, NJ 07104-3445

angiesantana8@gmail.com
347-683-4162

From: Jacqueline Smith
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:26 AM

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Dear Executive Director David Fish,

My name is Jacqueline Smith, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jacqueline Smith
960 Somerset Dr
Toms River, NJ 08753-4573

Jacquelinev86@aol.com
732-406-0171

From: Rickie Lucas
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is [@advFirst] [@advLast], and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Rickie Lucas

Sincerely,

Rickie Lucas

136Manhattan ave
Jersey City, NJ 07307-3815
lucas.rickie@hotmail.com
862-754-8436

From: Alexis Diaz
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Alexis Diaz, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Alexis Diaz
1165 US HIGHWAY 22, APT 179
North Plainfield, NJ 07060-3525

alexisdaguirre26@gmail.com
786-608-1786

From: Matthew Lopez-Reed
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Matthew Lopez-Reed, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Matthew Lopez-Reed
126 sandra way
Franklinville, NJ 08322-2692

mattred2017@gmail.com
856-526-6115

From: Cole Sommeling
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Cole Sommeling, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Cole Sommeling
526 Martin RD
Toms River, NJ 08753-6162

csommeling@comcast.net
732-678-6551

From: Tahir Quraishi
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Tahir Quraishi, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

As someone who works a full-time job during the day, the flexibility that DoorDash offers is a lifeline. It allows me to earn supplemental income in the evenings and on weekends to help cover essential expenses—especially during a time when the cost of living continues to rise, and many traditional jobs no longer provide enough to get by.

This kind of work isn't just a side hustle—it's become an essential part of how I support myself. Without the ability to choose when and how I work on the app, I would lose one of the few reliable and flexible sources of income available to me. Restricting that freedom could put me—and thousands of others in similar situations—at risk of financial hardship.

Moreover, flexibility benefits the customers as well. When I'm not able to dash, someone else can. It ensures timely deliveries and keeps the system running efficiently, which helps the community overall. Forcing a rigid employment structure onto a system that thrives on flexibility could break it for everyone—Dashers, customers, and even local businesses.

I urge you to reconsider the negative impact these proposed changes could have on hardworking, responsible individuals like myself who are simply trying to stay afloat.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for

me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Tahir Quraishi
16a garden pl , Kinnelon ,NJ
Kinnelon, NJ 07405-2980
tahirbetaa@gmail.com
862-452-0046

From: Richard Brito
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Richard Brito, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Richard Brito
419 stegman pwky
Jersey City, NJ 07305-2381

richiebrito94@gmail.com
551-229-7138

From: Thomas Carr Jr
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Thomas Carr Jr, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Thomas Carr Jr
5 Kimberly Ct.
Red Bank, NJ 07701-5033

jedimtjc1980@yahoo.com
732-804-2833

From: Brandon Cavallaro
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Brandon Cavallaro , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Brandon Cavallaro
474 Jarvis Rd
Sicklerville, NJ 08081-2126

cavallarobrandon962@gmail.com
856-668-0708

From: Derrick Wilkins
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Derrick Wilkins , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Derrick Wilkins
908 Murray Street
Avenel, NJ 07001-1623

Derrick.wilkins@gmail.com
732-485-0999

From: Daniel Koslowske
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Daniel Koslowske, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Daniel Koslowske
44 Lopatcong Drive Ewing NJ
Ewing, NJ 08638-1326

dannykozzz@gmail.com
609-947-9778

From: Brandon Rago
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Brandon Rago, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Brandon Rago
3 Monterey ct
Old Bridge, NJ 08857-3038

brago270@gmail.com
732-995-5655

From: Michelle Chiappetta
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Michelle Chiappetta, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michelle Chiappetta
54 Crestview Drive Parsippany NJ
Parsippany, NJ 07054-2409

chiappettamichelle@yahoo.com
610-620-4788

From: Ray Rosado
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Ray Rosado, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ray Rosado
301 1st St Apt#219 Harrison NJ
Harrison, NJ 07029-2151

rosadorayj@yahoo.com
646-895-2768

From: Daniel Rodriguez
To: Fish, David [DOL]
Subject: [EXTERNAL] Retirar las normas propuestas para el Contratista Independiente y la Prueba ABC.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

Yo soy [@advFirst] [@advLast]. Soy un Dasher y residente preocupado de Nueva Jersey. Quiero expresar mi oposición a las normas propuestas para contratistas independientes y la Prueba ABC, que podrían afectar a quiénes en el estado pueden trabajar como contratistas independientes.

Trabajar con DoorDash como Dasher me permite acceder a un trabajo que se adapta a mi vida. Ser contratista independiente significa ser mi propio jefe. Puedo elegir cuándo, dónde y cómo trabajar, lo que me permite usar el dashing como mejor me funcione. Esta norma amenaza esa flexibilidad al restringir mi trabajo y dificultar que personas como yo elijan trabajar de forma independiente.

El dashing me permite obtener ingresos adicionales cuando los necesito, ya sean unas pocas horas a la semana o más. Si esta norma se aprueba, podría obligarme a trabajar bajo unas normas laborales rígidas que no me convienen. Tendría menos control sobre mi trabajo, lo que dificultaría obtener los ingresos adicionales de los que dependo.

Sé que la mayoría de los Dashers, incluyéndome a mí, queremos seguir siendo contratistas independientes. No queremos ser empleados. Esta norma podría quitarnos esa opción y obligarnos a una estructura laboral tradicional que no se ajusta a nuestra forma de trabajar ni a nuestra necesidad de ganar dinero. Es crucial que tengamos la libertad de decidir cómo trabajar, y esta norma podría quitárnosla.

Por favor, reconsideren y protejan la posibilidad de que personas como yo sigan optando por un trabajo flexible e independiente.

Atentamente,

Daniel Rodriguez
100 beech st paterson nj
Paterson, NJ 07501-3040
yosoydanielcaleb@gmail.com
862-318-0209

From: Joselito Prieto
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Joselito Prieto, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Joselito Prieto
30 Overington Ave
Clementon, NJ 08021-4710

jprieto1634@gmail.com
856-271-6659

From: Gary Kummer
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:27 AM

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Dear Executive Director David Fish,

My name is Gary Kummer, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Gary Kummer
1184 Croton Road, Flemington NJ
Flemington, NJ 08822-5608

ceppkummer@gmail.com
908-334-9838

From: Pedro Barcelo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Pedro Barcelo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Pedro Barcelo
458 North 5th Street, 2nd Floor
Newark, NJ 07107-3927

pbarcelo3@gmail.com
862-371-4859

From: Mike Lally
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Mike Lally, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Mike Lally
39 Stockton Ave
Seaside Park, NJ 08752-1264

lally.mickey@yahoo.com
732-278-3365

From: Thaddeus Rios
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Thaddeus Rios, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Thaddeus Rios
22 Branchville Lawson Rd
Newton, NJ 07860-7028

trios1979@gmail.com
201-969-7646

From: Eliodor Paul
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Eliodor Paul, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Eliodor Paul
828 West Adams Avenue
Pleasantville, NJ 08232-2008

peliodor1@gmail.com
609-743-7915

From: Orou IMOROU
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Orou IMOROU, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Orou IMOROU
53 Spring Brook Rd
Nanuet, NY 10954-4423

oryaim74@gmail.com
845-945-0001

From: Kendra Smelly
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Kendra Smelly, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Kendra Smelly
221 s 9th street Newark nj
Newark, NJ 07103-3697

ksmelly84@gmail.com
862-452-5462

From: Nicole Caro
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Nicole Caro, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Nicole Caro
13A Old Cranbury Road
Cranbury, NJ 08512-3136

nicolecaro1@comcast.net
732-783-8060

From: ROBERT Farlow
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is ROBERT Farlow , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

ROBERT Farlow
3393 Durban st apt m
Hilliard, OH 43026-4316

robertfarlow1956@gmail.com
614-673-4272

From: Heather Benu
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Heather Benu, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Heather Benu
236 21st street apt 3 irvington nj
Irvington, NJ 07111-4487

clash-orderly.2i@icloud.com
973-897-5362

From: jonathan Rada
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is jonathan Rada, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

jonathan Rada
24 mabey lane
Butler, NJ 07405-1440

next_gen_man@yahoo.com
862-371-2519

From: Dinah Perry-Miller
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Dinah Perry-Miller, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dinah Perry-Miller
4222 Kaitlyn Ct
Princeton Junction, NJ 08550-5346

dinah_25@msn.com
609-917-5079

From: Robert Munoz
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Robert Munoz, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Robert Munoz
519 East 39th Street
Paterson, NJ 07504-1400

rmunoz_1976@yahoo.com
973-459-6534

From: Rick Speakman
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:28 AM

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Dear Executive Director David Fish,

My name is Rick Speakman, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Rick Speakman
220 garden terrace
Runnemede, NJ 08078-1419

rjemv@comcast.net
856-906-1205

From: Vincent Bonassisa
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Vincent Bonassisa , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Vincent Bonassisa
19 Merrilee lane
Toms River, NJ 08757-6516

vbonassisa@aol.com
908-868-6798

From: Joseph Botross
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Joseph Botross, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Joseph Botross
164 throckmorton ln old bridge
Old Bridge, NJ 08857-2138

joecarol1001@gmail.com
347-609-1616

From: Jae Lee
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Jae Lee, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Jae Lee
177 Firenze St northvale, nj
Northvale, NJ 07647-1803

Heyyayy33@yahoo.com
201-556-8784

From: Sazia Hasnin
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Sazia Hasnin, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sazia Hasnin
24 Oyster Bay Road
Absecon, NJ 08201-2872

sazi_t@yahoo.com
609-350-0786

From: Natia DeFaria
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Natia DeFaria, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Natia DeFaria
12 New York Ave
Ocean Grove, NJ 07756-1418

randnde@icloud.com
732-865-0883

From: Victoria Banko
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Victoria Banko, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Victoria Banko
126 Booream Ave
Milltown, NJ 08850-1037

victoriaxx1126@icloud.com
732-484-2451

From: Carlos Solano
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Carlos Solano, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Carlos Solano
99 1st St, Apt 1
Perth Amboy, NJ 08861-4644

Carlos_solano22@aol.com
732-822-7199

From: Alex Michalski
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Alex Michalski, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Alex Michalski
11b Water St Englishtown NJ
Englishtown, NJ 07726-1612

baberuth1324@aol.com
732-210-7045

From: Pamela CRISPINO
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Pamela CRISPINO, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Pamela CRISPINO
3 Twain Ct
Freehold, NJ 07728-4330

pacrisp975@gmail.com
908-902-9509

From: Omar Miranda
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Omar Miranda, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Omar Miranda
87 Madison Ave
Bergenfield, NJ 07621-2439

omarmiranda27833@gmail.com
201-877-6194

From: Steven Halfpap
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Steven Halfpap, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Steven Halfpap
335 8th St Palisades Park
Palisades Park, NJ 07650-2201

sdhalfpap@gmail.com
646-522-8356

From: Mark Waltonowski
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:29 AM

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Dear Executive Director David Fish,

My name is Mark Waltonowski , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Mark Waltonowski
248 dogwood. Lane
Forked River, NJ 08731-2824

mydadhank@aol.com
732-267-6669

From: Lee Baker
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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

Report Suspicious

Dear Executive Director David Fish,

My name is Lee Baker, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Lee Baker
228Victor Street Scotch Plains NJ
Scotch Plains, NJ 07076-1422

shaienbeyk@yahoo.com
201-618-2707

From: HECTOR MORALES
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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Dear Executive Director David Fish,

My name is HECTOR MORALES, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

HECTOR MORALES
207 SUMMER ST
Passaic, NJ 07055-3201

mrmoralesc-1284@hotmail.com
973-836-6397

From: Scott Gorlick
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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Dear Executive Director David Fish,

My name is Scott Gorlick, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Scott Gorlick
154 Dorado Beach Court
Howell, NJ 07731-5005

gordogjr@yahoo.com
732-995-7030

From: edward sweeney
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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Dear Executive Director David Fish,

My name is edward sweeney, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

edward sweeney
329 Prospect Ave
Avenel, NJ 07001-1156

esween@verizon.net
732-491-5247

From: Harry Vargas
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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Dear Executive Director David Fish,

My name is Harry Vargas, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Harry Vargas
115 Webster Ave
Paterson, NJ 07501-3229

hartyv4176@gmail.com
862-257-0353

From: Wandalis Moronta
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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Dear Executive Director David Fish,

My name is Wandalis Moronta , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Wandalis Moronta
324 PROSPECT ST apt1
Perth Amboy, NJ 08861-4029

moronta.wandalis@gmail.com
735-720-1096

From: Maria Challener
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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Dear Executive Director David Fish,

My name is Maria Challener, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Maria Challener
8 Paula Drive
Bergenfield, NJ 07621-3510

rmaria538@gmail.com
201-658-7279

From: David DiCerbo
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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Dear Executive Director David Fish,

My name is David DiCerbo, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

David DiCerbo
131 Hockenbury Dr
Glen Gardner, NJ 08826-3520

d_dicerbo@hotmail.com
862-266-0471

From: Nioce Elvecius
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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Report Suspicious

Dear Executive Director David Fish,

My name is Nioce Elvecius, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Nioce Elvecius
170 Randall Ave
Trenton, NJ 08611-3106

nioceelvecius@gmail.com
609-358-2896

From: Michael Clarity
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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Dear Executive Director David Fish,

My name is Michael Clarity, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michael Clarity
45 Lancaster Road
Brick, NJ 08723-5517

Mclarity95@Aol.Com
201-956-2832

From: Crystal Wiles
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:30 AM

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Dear Executive Director David Fish,

My name is Crystal Wiles, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Crystal Wiles
215 W Adams St
Paulsboro, NJ 08066-1308

questrw@icloud.com
610-710-6500

From: Abdulkadir Hatun
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Abdulkadir Hatun , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Abdulkadir Hatun
594 Forest st
Kearny, NJ 07032-3629

kadir__1975@hotmail.com
551-268-7978

From: Dawn Keeney
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Dawn Keeney, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dawn Keeney
223 DANDELION RD
Millville, NJ 08332-5513

dawnkhaz@comcast.net
856-602-3549

From: Leon Cook
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Leon Cook, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Leon Cook
159 Delaware St
Woodbury, NJ 08096-5914

leoncook1983@gmail.com
856-563-6285

From: Ozberk Guner
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Ozberk Guner, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Ozberk Guner
1100 Hudson Avenue , Voorhees Township
Voorhees, NJ 08043-1336

ozberk.gnr@gmail.com
239-309-5941

From: Michelle Warren
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Michelle Warren , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Michelle Warren
641 Riverside Ave. Toms River, NJ
Toms River, NJ 08757-1007

luvtoteach1998@comcast.net
732-232-3263

From: Maxime LIPSON
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Maxime LIPSON, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Maxime LIPSON
401 East 2nd Ave
Roselle, NJ 07203-1375

lmaxime75@gmail.com
732-540-5532

From: Joseph Francis
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Joseph Francis , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Joseph Francis
235 lois lane lakewood
Lakewood, NJ 08701-4856

Jfrancis9439@gmail.com
848-223-3681

From: Raymond Hand
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Raymond Hand, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

Dashing is a way for me to earn extra income when I need it, whether it's a few hours a week or more. If this rule goes through, it could risk forcing this job under rigid employment rules that don't work for me. I'd have less control over my work, making it harder to get the extra income I rely on.

I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Raymond Hand
1338 Washington Ave floor 1
West Deptford, NJ 08096-1036

myhands4@yahoo.com
609-325-8211

From: Satnam Singh
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Satnam Singh , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Satnam Singh
501 Ely Harmony Freehold
Freehold, NJ 07728-8760

Charmingsat@yahoo.com
917-362-9759

From: Antoni Saltkhutsishvili
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Antoni Saltkhutsishvili, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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I know that most Dashers, including me, want to remain independent contractors. We don't want to be employees. This rule could take that choice away and push us into a traditional job structure that doesn't fit the way we work or need to earn. It's crucial that we have the freedom to decide how to work, and this rule could take that freedom away.

Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Antoni Saltkhutsishvili
3053 brighton 1 st pl, brooklyn NY
Brooklyn, NY 11235-8018

antonisaltkhucishvili@gmail.com
929-673-8700

From: Sarah Rovinsky
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Sarah Rovinsky, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Sarah Rovinsky
1404 Wall Ave, Burlington, NJ
Burlington, NJ 08016-4620

musiclvr1@hotmail.com
609-233-5030

From: Christina Serrano
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Christina Serrano , and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Christina Serrano
122 Butler Street Paterson NJ
Paterson, NJ 07524-1920

Cserrano111@yahoo.com
973-930-6154

From: Azhar Munir
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Azhar Munir, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Azhar Munir
402 Matawan ave
Cliffwood, NJ 07721-1286

azharmunir@me.com
732-306-7179

From: Carolyn Kehoffer
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Carolyn Kehoffer, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Carolyn Kehoffer
111 East Taunton Avenue. West Berlin, NJ
West Berlin, NJ 08091-3803

callybird70@verizon.net
856-397-2585

From: Victor Camacho
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:31 AM

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Dear Executive Director David Fish,

My name is Victor Camacho, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Victor Camacho
855 SUMMER AVE
Newark, NJ 07104-3617

Victorcamacho1982@icloud.com
862-888-8764

From: Brett Breckley
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:32 AM

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Dear Executive Director David Fish,

My name is Brett Breckley, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Brett Breckley
1932 Cologne Avenue
Mays Landing, NJ 08330-2441

dbreck9899@yahoo.com
609-992-8890

From: Melissa McZorn
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:32 AM

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Dear Executive Director David Fish,

My name is Melissa McZorn, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Melissa McZorn
327 South 11th Street
Newark, NJ 07103-3770

mmczorn@gmail.com
973-474-8291

From: Mubashir Rehman
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:32 AM

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Dear Executive Director David Fish,

My name is Mubashir Rehman, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Mubashir Rehman
34 Mary St
Carteret, NJ 07008-2208

uber.mubashir@gmail.com
929-624-4754

From: MaryAnn Mezger
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:32 AM

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Dear Executive Director David Fish,

My name is MaryAnn Mezger, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

MaryAnn Mezger
20 Henry Marshall Dr
Trenton, NJ 08620-9673

mam7762@comcast.net
609-915-0335

From: Dylan Boorstein
To: Fish, David [DOL]
Subject: [EXTERNAL] Withdraw the proposed Independent Contractor and ABC Test rules.
Date: Wednesday, August 6, 2025 7:02:32 AM

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Dear Executive Director David Fish,

My name is Dylan Boorstein, and I'm a Dasher and a concerned resident of New Jersey. I want to express opposition to the proposed Independent Contractor and ABC Test rules that could alter who in the state gets to work as an independent contractor.

Delivering with DoorDash as a Dasher lets me get access to work in a way that fits into my life. Being an independent contractor means I get to be my own boss. I get to choose when, where, and how I want to work, which allows me to use dashing in the way that works best for me. This rule threatens that flexibility by targeting my work and risking making it harder for people like me to choose to work independently.

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Please reconsider and protect the ability for people like me to continue to choose flexible, independent work.

Sincerely,

Dylan Boorstein
5208 Riverfront Dr.
Palmyra, NJ 08065-2143

dylanb0725@gmail.com
856-625-1523