



**COUNTY OF ESSEX**  
 DEPARTMENT OF CITIZEN SERVICES  
 DIVISION OF COMMUNITY ACTION/CONSUMER SERVICES  
 Comprehensive Emergency Assistance System (CEAS/CoC)  
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April 28, 2025

Greetings,

The Essex County Comprehensive Emergency Assistance/Continuum of Care (CEAS/CoC) appreciates the opportunity to provide comments for the New Jersey Supreme Court's proposed amendments to the Landlord Tenant forms and processes. At the heart of the CEAS/CoC's efforts is the development of a coordinated, systems-based approach to address homelessness and creates a seamless continuum of housing and supportive services for Essex County residents at families experiencing or at risk of experiencing homelessness. This includes residents who are facing eviction in Essex County's Landlord Tenant Court. Many members of the CEAS/CoC work directly with residents who are facing eviction, providing rental and general assistance, resource navigation, and, when needed, rapid rehousing and diversion. Most of these providers and members are non-attorneys which may rely on court forms and processes to make determinations of assistance eligibility.

**VERIFIED COMPLAINT**

Overall, we appreciate the proposed changes and find the new form to be clearer and more user-friendly.

*Question 7:* We found this language confusing as there are multiple registrations that landlords may be required to obtain and maintain. We recommend specifically naming the registration/certification that is required as there could be many.

*Question 13:* This section generated substantial conversation among providers as the list of potential subsidies is frequently subject to change and notable forms of assistance or subsidy programs were missing, like Temporary Rental Assistance or HUD-Veterans Affairs Supportive Housing (HUD-VASH), were excluded. While it was noted that this may be due to the fact that not all assistance programs require special notice, we believe that listing some, but not all, forms of assistance, even with an "other" line can create confusion and lead landlords or their attorneys to leave certain programs off their list. We recommend that the Judiciary consider providing multiple lines for landlords or their attorneys to list all housing programs that apply or have applied to the tenancy rather than providing check boxes and instruct them to be as specific as possible when writing in the applicable program name.

*The Essex County CEAS/CoC shall be governed by a Board, which will provide oversight and accountability for all Essex County CoC responsibilities.*

*Putting Essex County First*

### *Non-Payment of Rent Subsection*

We appreciate the proposed changes to this subsection and, per providers working in the rental assistance space, to be more “transparent” and “user-friendly.” As noted by CEAS/CoC members, when a tenant is seeking rental assistance for arrears and is facing eviction, there is an urgency to screen and determine eligibility quickly. Anything that clearly streamlines information in a way that facilitates understanding and need assists in the application, screening, and eligibility process. Specifically, we appreciate how the court separated base rent due, unpaid, and owing in section 17 from “additional rent” due in section 20. This helps providers clearly determine what exactly is owed, rather than relying on leases which can often be confusing and may include fees that are not evictable.

We ask that the courts reintroduce language of question 9b from the original complaint to the proposed verified complaint. As stated above, it is important for providers who may be able to assist (and whose information is included in court resources) to be able to quickly determine what is due and owing to prevent eviction. Reintroducing the language below gives clear direction to providers about assistance that must be provided to prevent eviction, should additional rent become due between complaint filing and the trial date/date the tenant requests assistance.

- *9B:* The date that the next rent is due is \_\_\_\_\_
- If the case is scheduled for trial before that date, the total amount you must pay to have this complaint dismissed is \_\_\_\_\_ (Base Rent, Permissible Additional Rent, and Filing Fees)
- If the case is scheduled for trial on or after that date, the total amount you must pay to have this complain dismissed is \_\_\_\_\_ (Base Rent, Permissible Additional Rent, and Filing Fees, plus the amount of the next due base rent)

### *SUMMONS*

We support the decision to return the trial date to the summons and complaint.

### *IMPLEMENTATION & SUPPORT:*

As we reviewed the forms, we were reminded that legal jargon and court protocols, even when simplified, can be difficult to understand for those without legal training. Because many of the consumers we assist are representing themselves in court, it is important

that forms, protocols, and resources provided to assist with court navigation are simple, typically at a 5th or 6th grade reading level.

Even as providers who frequently assist those who are in landlord tenant proceedings, we found some terminology and questions presented on this form could still confuse unrepresented individuals or those without legal training. We recommend that the court's resources for tenants be updated to include information about the complaint, summons, and LCIS, clearly define terminology, programs, and statutes referenced, and maintain up to date resources that can assist those without legal training.

Respectfully,



Jessica Torres

Continuum of Care Coordinator



Rafael Romero

Continuum of Care Manager