REDACTED

Supreme Court of New Jersey

DOCKET NO. 089571

IN RE THE MATTER CONCERNING THE STATE GRAND JURY :

CRIMINAL ACTION
UNDER SEAL

On Petition for Certification of the Final Judgment of the Superior Court of New Jersey, Appellate Division.
Docket No. A-003795-22

Entered: June 4, 2024
Sat Below:
Hon. Greta Gooden Brown, P.J.A.D.
Hon. Arnold L. Natali, Jr., J.A.D.
Hon. Michael J. Haas, J.A.D.

PETITION FOR CERTIFICATION AND APPENDIX OF PETITIONER STATE OF NEW JERSEY

LYNDSAY V. RUOTOLO
ACTING ATTORNEY GENERAL OF NEW JERSEY
ATTORNEY FOR PLAINTIFF-PETITIONER
RICHARD J. HUGHES JUSTICE COMPLEX
TRENTON, NEW JERSEY 08625

JEREMY M. FEIGENBAUM - Solicitor General (No. 117762014)
MICHAEL L. ZUCKERMAN - Deputy Solicitor General (No. 427282022)
VIVIANA HANLEY - Deputy Attorney General (No. 401572022)

Division of Criminal Justice, Appellate Bureau
P.O. Box 086, Trenton, New Jersey 08625
(609) 376-2400

OF COUNSEL AND ON THE BRIEF

July 5, 2024

TABLE OF CONTENTS

TABLE OF APPENDIX

TABLE OF AUTHORITIES

PAGE

CASES

STATUTES

RULES

OTHER AUTHORITIES

TABLE OF CITATIONS

"Pa" – State's certification petition appendix, attached to this brief
"Ab" – State's opening brief in the Appellate Division
"Aa" – Appendix to State's opening Appellate Division brief

PRELIMINARY STATEMENT

The decision below dramatically and incorrectly circumscribes the grand jury's power to issue a presentment—a power that has existed since the colonial period, and that was enshrined in the 1947 Constitution. It does so even though no presentment was before the court. It does so based upon a limit that appears nowhere in our Constitution and is inconsistent with historical practice. It does so shielded from public view, depriving the public (including victims) of crucial information about when and to what extent serious statewide harms can be called to account. And it does so in a case of tremendous public importance.

In 2018, the Attorney General established the Clergy Abuse Task Force to investigate the tragic history of sexual abuse by clergy in this State, prevent its recurrence, and seek justice for victims that is long overdue. The Task Force was empowered to subpoena documents and testimony, present information to a grand jury, and pursue indictments and a grand jury presentment as part of its mandate to address any wrongdoing uncovered. [redacted] the Diocese of Camden responded with a broadscale attack on the grand jury's authority to issue any future presentment involving sexual abuse by clergy and

the response thereto—even though the State's investigation was ongoing and no presentment had been returned. The courts below indulged this gambit: the trial court held that the grand jury lacks the authority to return a presentment on this subject, and the Appellate Division summarily affirmed.

This Court should grant certification because the decisions below rest on two consequential errors, both of which conflict with this Court's precedent and longstanding practice. First, the courts below erred in entertaining a challenge to a grand jury presentment that does not exist. The governing Rule, precedent, and historical practice all confirm that a court should review a presentment only after a grand jury returns it (though before it is made public)—not when one is merely anticipated. For good reason: if a court considers an actual presentment, rather than a hypothetical one, it can assess concretely whether a grand jury has stayed within the proper limits. And the court at that time has broader tools to address legitimate concerns, such as striking or redacting portions of the report, rather than shutting down the grand jury investigation wholesale.

Second, the courts below erred, and contradicted considerable precedent, in announcing a new rule of law that presentments may not focus on the conduct of private individuals. Consistent with our Constitution, this Court's precedents, and historical practice, presentments may "refer to public affairs or conditions" no matter whether the entity responsible for those conditions is public or private.

This case is a perfect example: statewide sexual abuse by clergy, and the State's failure to prevent it, have had a tremendous impact on the public. The grand jury's presentment power is a tool to voice the public conscience, to learn from past harms, and to propose reforms. But the decisions below preclude the use of that tool to address one of the most wrenching harms in recent memory.

The need for certification is greater still because these consequential opinions—and the limits on the presentment power they contain—are secret.

[redacted]

By keeping the dispute sealed, the courts deprived amici of participation. And by keeping their substantive holdings from the public, the courts have prevented the public (including victims) from learning that no presentment on clergy abuse can be forthcoming, and about these new limits on the presentment power more broadly. Victims wonder about the State's failure to give them voice. And New Jersey residents and policymakers cannot consider whether to adopt new rules that would allow presentments in these circumstances, because they are unaware that courts have barred their use. A rule this consequential and sweeping cannot be hidden from public view. Certification is amply warranted.

STATEMENT OF FACTS AND PROCEDURAL HISTORY[1]

In 2018, then-Attorney General Gurbir S. Grewal announced the Clergy Abuse Task Force. (Pa3). The Task Force was created following the publication of a Pennsylvania grand jury report regarding sexual abuse committed by clergy, which included the disclosure of sexual abuse by clergy who had served in New Jersey. (Pa4). The Attorney General charged the Task Force with investigating allegations of sexual abuse by clergy and efforts to conceal such abuse. (Pa4). Among other things, the Task Force was to review existing agreements with the State's Catholic Dioceses regarding both reporting and cooperation with law enforcement to determine whether those agreements had been complied with and "whether any additional action is necessary." (Pa5).

To fulfill its mission, the Attorney General authorized the Task Force—led by "[a]n experienced sex crimes prosecutor"—"to present evidence to a State Grand Jury, including through the use of subpoenas to compel testimony and the production of documents, in addition to other investigative tools." (Pa4). The Attorney General authorized the Task Force both to pursue indictments and to seek issuance "of a state grand jury presentment and report." See Press Release, Catholic Priest Sentenced to Four Years in Prison for Sexually Assaulting Teenager in 1990s (Aug. 26, 2019), https://tinyurl.com/2p9bs34s.

[1] For the convenience of the Court, these related sections are combined.

The Task Force swiftly began its work. It established a hotline where trained professionals field calls 24 hours a day, every day. (Pa4). To date, the hotline has received over 550 calls, including allegations of sexual, physical, and mental abuse by clergy, and at least four clergy have been arrested. (Pa5-6). The Task Force also met with counsel for all five Catholic Dioceses in New Jersey—the Archdiocese of Newark, and the Dioceses of Paterson, Metuchen, Trenton, and Camden—to advise them of the investigation. (Pa6). [redacted] the Diocese of Camden—alone among the five New Jersey Dioceses—challenged the grand jury's authority to issue any presentment on clergy sexual abuse. (Pa8).

On May 25, 2023, two years after the end of briefing, the trial court issued its oral opinion, holding both that (1) it could lawfully consider the validity of a hypothetical presentment on sexual abuse by clergy and the response thereto, and (2) that the grand jury would lack authority to issue such a presentment. (Pa1-Pa37). As to the former, the court rejected the State's objection that a court has the power to review a presentment only once the grand jury returns one, not when one is merely anticipated or hypothesized. See (Pa8, 19). While Rule 3:6-9 provides that the assignment judge may review a presentment after a grand jury has returned one (but before publication), the court expressed concern about the substantial resources that would be expended to convene a special state grand jury in the meantime. (Pa20-22). And because then-Attorney General Grewal issued a Press Release in 2018 announcing his intent to seek "a report similar to … [that of the] Pennsylvania Grand Jury," (Pa19), the trial court held that the contours of a presentment were sufficiently clear to evaluate, (Pa22).

On the merits, the court held that the grand jury lacks "authority to return a presentment which focuses … on misconduct by Catholic priests." (Pa23). The court acknowledged that Rule 3:6-9(a) states only that presentments "may refer to public affairs or conditions." But it construed that language to establish that "private conduct" does not qualify, even where that conduct "is a matter of public concern." (Pa24). And in line with that narrow view of "public affairs

or conditions," the court held that "[t]he presentment promised here" would not "refer to public affairs [or] conditions" because "priests are not public officials and the Catholic Church is not a public entity." (Pa23). Further, the court held, authorizing a presentment touching on private conduct could be "fundamentally unfair" because the eventual presentment might censure an identifiable private individual who would lack the ability to respond. (Pa26-27). Finally, the court added that its concerns were exacerbated by a perceived lack of "imminent" harm, as some of the abuse under investigation occurred decades ago. (Pa28). The court therefore "denie[d] the Attorney General's request to have the Court empanel a special State Grand Jury to serve the … Task Force" and declared the grand jury lacks authority to issue a presentment on this topic. (Aa2-3).

The State appealed. [redacted] the State moved to unseal the trial court briefs and ruling, with redactions. The Appellate Division denied the motion, (Pa39-40), and this Court denied leave to appeal, (Pa41). In doing so, the Court took "no position" on the merits, as a letter from the Supreme Court Clerk emphasized. (Pa43). The Clerk's letter also clarified that even if the docket was sealed, court orders and opinions would still be publicly accessibly in line with the Judiciary's general "policy of open access to [its] records"; its practice of issuing public

opinions in "previous grand jury matters"; and Rule 1:38-1A, which permits public decisions to refer to information from sealed records. (Pa42-43).

After the Diocese moved for argument to be held in a closed courtroom, the Appellate Division granted that motion and also sua sponte amended the case caption "to remove reference to the subject matter" of the investigation. (Pa45). Although the panel denied the Diocese's later motion to seal its opinion, (Pa46), the opinion it issued gave no information to the public, (Pa47-48). Instead, in a two-sentence decision, the court affirmed "the Law Division's May 25, 2023, order" "substantially for the reasons set forth by the trial court." (Pa47). The trial court's ruling remains sealed. (Pa1). This petition follows.

QUESTIONS PRESENTED

1. Whether a court may decide the validity of a hypothetical presentment that has not yet been returned by a grand jury.
2. Whether a presentment that addresses statewide sexual abuse by clergy and the response thereto concerns public affairs or conditions.

ARGUMENT

This Court should grant certification to evaluate two important holdings that have hamstrung the State's response to a grievous and widespread harm. First, the panel prematurely ruled on the lawfulness of a presentment that does not exist, based on speculation about what such a presentment eventually may look like. Second, the panel wrongly determined that a presentment addressing

statewide abuse by clergy could not concern public affairs or conditions because the harms were caused by private persons. Not only did the courts below doubly err, but the public lacks knowledge of the resulting limits on the presentment power, magnifying the serious damage worked by the decision below.

POINT I

CERTIFICATION IS WARRANTED TO ASSESS TWO LEGAL ERRORS CIRCUMSCRIBING THE GRAND JURY'S PRESENTMENT POWER.

This Court should review this consequential case because the panel erred twice when it substantially adopted the trial court's opinion. (Pa47). First, the panel adjudicated the validity of an anticipated but not yet returned presentment, contravening the established process laid out in the Rules and violating norms of justiciability. Second, it resolved that dispute by categorically precluding use of a presentment to address statewide harm perpetrated by private individuals—contrary to Rule 3:6-9, real-world practice, and this Court's decisions.

A. Certification Is Warranted To Address Whether Courts May Consider The Validity Of Hypothetical Grand Jury Presentments.

As a threshold matter, the courts below erred in entertaining a challenge to a hypothetical presentment that no grand jury had returned or considered. Rule 3:6-9, established precedent and practice, and first principles all dictate that the validity of a presentment should be adjudicated after a grand jury returns one (but before publication), not when a presentment is merely anticipated.

Rule 3:6-9 and every prior decision involving a presentment confirm that judicial review of a presentment must be conducted after the presentment comes into being. Pursuant to the Rule, if twelve grand jurors agree that a presentment should issue, R. 3:6-9(a), the presentment—prior to publication—is "returned in open court to the Assignment Judge," R. 3:6-9(b), for "the Assignment Judge [to] examine the presentment," R. 3:6-9(c). The judge may, inter alia, "examine the minutes and records of the grand jury" to determine whether the presentment is supported by "a substantial foundation," and it may "strike" all or part of the presentment, including when "the presentment is false" or if "other good cause appears." R. 3:6-9(c). After this process, any "portions of the presentment … not referred back to the grand jury" or stricken are "filed and made public." R. 3:6-9(d). Nowhere does the Rule permit the trial court to preempt a grand jury investigation because of anticipated problems that the court hypothesizes may result. Nor is the State aware of any case approving a challenge to an expected rather than actual presentment. Rather, in each case regarding presentments, the court was reviewing an actual presentment for its validity. See (Ab10).

As this case illustrates, there are important reasons why both the Rule and precedent require would-be challengers to wait for a presentment to exist. Most obviously, without a presentment, review rests on speculation. Moreover, there are more tailored tools available under the Rule—such as striking only portions,

or requiring tailored redactions—that are unavailable pre-presentment. See R. 3:6-9(c). This case is a perfect example. The trial court's concerns were driven by speculation that a future presentment would identify long-ago abusers, (Pa26-28), would focus only on the perpetrators and not on the failure of officials and institutions to respond, (Pa23), or would insufficiently offer potential reforms, (Pa30-31). But those were mere conjectures, and had the court waited until a presentment had been returned, it could have assessed whether they had come to pass, and adopted narrower remedies if they had. Instead, the court prevented a grand jury even from convening, short-circuiting the entire process.

The given justifications for evaluating a hypothetical presentment do not withstand scrutiny. First, that a previous Attorney General announced an intent to seek a presentment in the wake of Pennsylvania's report in 2018, see (Pa19, 22),[2] provides insufficient evidence of what a presentment might look like today, and regardless ignores the more tailored tools the court could deploy to address any concerns that materialize. Second, that operating a special grand jury on this topic would require additional resources, see (Pa22), is also no justification. Courts do not generally oversee whether the State is using the grand jury's time

[2] The court also took issue with the Attorney General's stated interest in seeking a presentment. (Pa24). But that is not improper: just as the State seeks indictments, so too is it normal to seek a presentment. (Ab29-30). And while the idea can originate with the State, at least twelve jurors must still agree.

well, cf. Bordenkircher v. Hayes, 434 U.S. 357, 364 (1978) (confirming "the decision whether or not to prosecute, and what charge to file or bring before a grand jury, generally rests entirely in [the prosecutor's] discretion"), let alone balance resources against the public's interest in "voic[ing]" its "conscience" about public affairs, In re Presentment by Camden Cnty. Grand Jury, 10 N.J. 23, 66 (1952) (Camden I). And here, the State has recognized the resource concerns and proposed means to address them. See (Ab14-15). Finally, that courts have supervisory authority over the grand jury, (see Pa21-22, 32), changes nothing: the State's fundamental point is simply that the Rules, precedent, and practice govern how that authority is exercised. That this case is the first to break from the established approach for reviewing presentments justifies certification.

B. Certification Is Warranted To Address Whether A Grand Jury Could Consider A Presentment Focusing On Widespread Sexual Abuse And The Response Thereto.

The Appellate Division committed a second error, this time on the merits: it improperly affirmed that a presentment concerning statewide clergy abuse and the response thereto necessarily would "not concern public affairs or conditions" and thus would be impermissible. (Pa26). That flouts the Rules, practice, and this Court's decisions—and hamstrings this important process.

The courts' conclusion that presentments may not focus on acts by private individuals is inconsistent with all relevant sources of law. (Ab18-28). Rule

3:6-9 establishes that a presentment "may refer to public affairs or conditions," and in no way suggests that "public affairs or conditions" can be impacted only by the acts of public officials or entities. Compare (Pa23) (trial court's holding) with R. 3:6-9(a). The structure points the same way: the Rule imposes special procedural requirements when a presentment mentions a "public official," which logically implies that some presentments do not. See R. 3:6-9(c). The purpose of a presentment compels the same: presentments are a way for the grand jury to investigate, suggest reform, and "voice the conscience of the community," Camden I, 10 N.J. at 66, and the general public can be as harmed by widespread misconduct of private actors as by any official misconduct. And the history of presentments supports the same result: grand juries in New Jersey have issued presentments dealing not only with misconduct by government actors, but also with harms perpetrated by private parties, ranging from tax evasion to domestic violence to poor conditions in private workplaces, privately-created nuisances, and the explosion of a privately-run gas pipeline. E.g., (Ab19-21). Especially here, where any presentment would focus not only on sexual abuse but on the failures of the public response thereto, the courts' limits are unsupportable.

Not only do the courts' new limitations on presentments conflict with text, structure, intent, and history, but they also contravene this Court's precedents. Just five years after the adoption of the 1947 Constitution, this Court extensively

examined the presentment power. See Camden I, 10 N.J. 23. The Court first canvassed the same history the State detailed in this case, id. at 41-58, which included presentments that involved "a private citizen," id. at 66-67. It then reasoned that the plain text of "the 1947 Constitution could only have meant that the Convention approved presentments of public affairs as they had been known in New Jersey from earliest colonial times." Id. at 65. And it subsequently confirmed that presentments may address any "matter of general public interest, or … public evil or condition to which, in the discretion of the jury, the attention of the community should be directed," In re Presentment by Camden Cnty. Grand Jury, 34 N.J. 378, 391 (1961) (Camden II), meaning any "conditions or offenses affecting the morals, health, sanitation or general welfare," id. at 390-91. The notion that "private conduct" does not qualify, (Pa24), and that a grand jury cannot proceed because "priests are not public officials and the Catholic Church is not a public entity," (Pa23), is irreconcilable with precedent.

This case is a perfect example of both the proper use of presentments and the damaging impacts of the decisions below. The widespread and decades-long sexual abuse of children by clergy and the failures of the response, including by state officials, is unquestionably a matter that "affect[s] the morals, health ... or general welfare" in our State, and it may well be one to which, "in the discretion of the jury, the attention of the community should be directed." Camden II, 34

N.J. at 391. A grand jury in Pennsylvania issued a report that identified sexual abuse far more extensive than was previously understood, and laid out reforms tailored particularly to that State. Other States have subsequently followed suit, likewise issuing reports that identify the scope of the problem, the failures of the response, and recommendations for reform. In New Jersey, the Task Force hotline received over 550 calls detailing abuse committed by trusted religious leaders and thereby evidencing a system-wide failure to effectively respond. A presentment would allow a grand jury to investigate these conditions, including the failures of the response, and make recommendations for reform. The State has been barred from asking it to even consider doing so.[3]

Nor is there any merit to concerns that allowing this presentment process to go forward would lack procedural protections and end up unduly impugning specific private individuals. (Pa27, 34-35). For one, to the degree that a future presentment names specific individuals, the presentment cannot issue until it is reviewed and approved by the Assignment Judge, who may strike it in part or in full, R. 3:6-9(c), and until "any aggrieved person" has had a chance to appeal, R. 3:6-9(e). Moreover, the State itself has embraced the notion that, prior to a

[3] Indeed, while the opinions below that have established these new legal rules are unpublished, that is of no moment: because the rulings are binding on the parties, they forever shut down any presentment addressing the statewide sexual abuse, and the response thereto, at issue here.

presentment's publication, notice and an in camera hearing should be provided to any individuals named therein, even if those individuals are private rather than public officials—the very procedures the trial court believed were missing. (Ab36-38). To the extent the trial court had concerns about the process being afforded under the Rules, the remedy should have been the additional process, not an order outright precluding a grand jury from convening.[4]

The Appellate Division's decision has prevented the grand jury from even considering any presentment regarding widespread clergy sexual abuse and the response thereto. That decision is inconsistent with all relevant sources of law, including with this Court's precedents. Certification is needed to consider, and ultimately to reverse, these profound misunderstandings about the scope of the presentment power, applied here to a hypothetical presentment.

[4] The courts also held not only that a presentment must involve public officials or entities, but also that the harm must be imminent, and doubted the ability of a New Jersey grand jury to offer any recommendations for reform that would be helpful at present. (Pa28, 31). But no law imposes a freestanding mandate that presentments focus on an "imminent" topic; instead, the courts below misread a sentence of dicta from In re Monmouth Cnty. Grand Jury, 24 N.J. 318 (1957), which only this Court can fix. See (Ab32) (explaining that subsequent cases and practice confirm Monmouth merely required presentments related to the public affairs or conditions). In any event, the Task Force hotline and investigation are live, harms to victims continue through the present, and reforms to institutions public and private remain possible. (Ab32-34). That a Pennsylvania grand jury made tailored recommendations for Pennsylvania is evidence that a New Jersey grand jury could do the same for New Jersey.

POINT II

THE INTERESTS OF JUSTICE AND GENERAL IMPORTANCE OF THE ISSUES BOLSTER THE NEED FOR CERTIFICATION.

Not only is certification needed to correct two significant legal errors that conflict with this Court's precedents, Rules, and longstanding practice, but the impacts of the decision below also undermine the "interests of justice" in a case of tremendous "public importance." R. 2:12-4. Most obviously, in light of the decision below, no grand jury may even consider a presentment involving decades of sexual abuse by clergy across the State, or the failure to prevent it. That hamstrings efforts by the State to respond to, and learn from, the wrenching and decades-long abuse perpetrated across New Jersey, abuse further uncovered in part by a Pennsylvania grand jury, but left unfinished for this State.

The harm from the decision is exacerbated—and the need for certification is strengthened—by the Appellate Division's decisions to keep the docket under seal, (Pa39), and ultimately to affirm these new legal rules out of the public eye, (Pa48). Initially, the sealing of the docket, over the State's objections, prevented amicus participation on the weighty questions involved. See R. 1:13-9 (allowing potential amici to seek leave to participate in briefing and at oral argument); see also, e.g., Facebook v. State, 254 N.J. 329, 344 (2023) (after case was unsealed at this Court, participation by amici regarding constitutional protections for

communication data warrants). And in this case, amici would almost certainly include victims, who could weigh in on the role of the grand jury in giving them voice and proposing reforms to prevent these tremendous harms from recurring. If this Court denies certification, it will leave in place a ruling that shuts down a presentment relating to statewide sexual abuse by clergy without ever allowing the public or victims to weigh in.

Worse still, the decisions below do not even inform victims or the public that the grand jury is barred from producing a presentment on statewide sexual abuse by clergy and the response thereto. When this Court previously declined to consider the sealing of this matter on an interlocutory basis, it cautioned that it was expressing no view on the merits of the sealing order, and it emphasized that judicial opinions in sealed matters are often still publicly accessible given the Judiciary's "policy of open access." (Pa42-43). But although the Appellate Division promised to issue a public opinion, see (Pa46), it did so in name only: its two-sentence opinion included no reasoning and simply affirmed a trial court opinion that was issued in secret and remains under seal, (Pa48).

That works two profound harms, which can be remedied only if this Court grants certification and issues a public opinion—no matter which party prevails. First, keeping this new legal rule secret risks "kindling public misperception and eroding public confidence" by undermining the public's "understanding of the

criminal justice system." State v. Williams, 93 N.J. 39, 54 (1983). The public—and, in particular, victims—have no reason to doubt that a presentment, which could give them a measure of the justice they have long sought, would be lawful. If no presentment ultimately issues, victims might well ascribe that to a lack of concern about their harms and lack of interest in reforms.[5] Cf. N.J.S.A. 52:4B-36 (victims' right to be "informed about the criminal justice process"). Absent any public disclosure of these limits on presentments, which is possible only if this Court grants certification, victims will remain in the dark.

Second, a lack of public awareness prevents victims, decisionmakers, and the general public from exercising "supervisory rights over government" on this important issue. Salzano v. N. Jersey Media Grp. Inc., 201 N.J. 500, 519 (2010) (explaining that "an open and transparent court system is an integral part of our democratic form of government" (quotation omitted)). To the degree members of the public, or the Criminal Rules Committee, would disagree with the new limits the courts below imposed on the presentment power, they may well wish to propose amendments to Rule 3:6-9 to supersede this (mis-)construction. But

[5] Victims have already expressed these concerns based on the delay in issuing a presentment alone. See Deena Yellin, "Five years later, clergy abuse survivors still waiting for NJ attorney general's report," (Jan. 23, 2024), NorthJersey.com, https://www.northjersey.com/story/news/2024/01/23/after-5-years-clergy-abuse-survivors-waiting-for-nj-probe-report/69881435007/. Given the sealed nature of the trial court's and Appellate Division's legal rule—of which victims have no awareness—no explanation can be forthcoming.

if they are unaware of the decisions below, they (naturally) cannot do so. Nor can the public or legislators propose new laws that either expand the presentment authority or provide other investigative tools to fill this void. Public knowledge is critical, and that knowledge will be possible only with certification.

The panel's decision dramatically circumscribes the grand jury's authority to address sexual abuse by clergy and the response thereto—without informing the public of this new legal rule. This dispute is thus both undeniably concerned with "public affairs and conditions" under Rule 3:6-9, and of sufficient "general public importance" so as to warrant certification under Rule 2:12-4.

CONCLUSION

This Court should grant certification and reverse the judgment below.

Respectfully submitted,

LYNDSAY V. RUOTOLO
ACTING ATTORNEY GENERAL OF NEW JERSEY
ATTORNEY FOR PLAINTIFF-PETITIONER

BY: */s/* Jeremy M. Feigenbaum
Jeremy M. Feigenbaum
Solicitor General
Jeremy.Feigenbaum@njoag.gov

Date: July 5, 2024