



**UNION COUNTY PROSECUTOR'S OFFICE**  
**ANDREW K. RUOTOLO JR. JUSTICE CENTER**  
32 RAHWAY AVENUE  
ELIZABETH, NEW JERSEY 07202-2155  
(908) 527-4500 FAX: (908) 289-1267  
UCPO@ucpo.org

**WILLIAM A. DANIEL**  
Prosecutor of Union County

**JAMES O. TANSEY**  
First Assistant Prosecutor

**DAVID C. HUMMEL**  
Deputy First Assistant Prosecutor

June 25, 2025

Honorable Chief Justice and Associate Justices  
Supreme Court of New Jersey  
Post Office Box 970  
Trenton, New Jersey 08625

Re: State v. Yusef Allen  
Supreme Court Docket No. 090853  
Appellate Docket No. A-1045-22T4

Honorable Chief Justice and Associate Justices:

This letter is intended to serve in lieu of a formal answer in opposition to the Petition for Certification filed by defendant. The State respectfully relies upon its Appellate Division brief, four copies of which are enclosed, and upon the opinion of the Appellate Division, copies of which defendant is required to file with this Court pursuant to R. 2:12-7(a), for its response.

Honorable Chief Justice and Associate Justices

Page 2

June 25, 2025

It is submitted that defendant's petition fails to raise a question deserving of certification within the meaning of R. 2:12-4. Therefore, it is respectfully requested that certification be denied.

Respectfully submitted,

WILLIAM A. DANIEL  
Prosecutor of Union County

s/Michele C. Buckley

By: MICHELE C. BUCKLEY  
Assistant Prosecutor  
Attorney ID No. 049301992

mg

Enclosures