

Revised
Ord. #3

**ORDINANCE OF THE BOARD OF FREEHOLDERS
COUNTY OF ESSEX**

ORDINANCE NO. 0-2019-00017 **AUTHORITY FOR ORDINANCE:** N.J.S.A. 40:41A-38

PROPOSED BY: COUNTY EXECUTIVE **AUTHORITY FOR ACTION:** C.C.E. 2-IIC

SUBJECT: **ORDINANCE ESTABLISHING AN ESSEX COUNTY CORRECTIONAL FACILITY
CIVILIAN TASK FORCE**

WHEREAS, Essex County recognizes the need to protect the safety, dignity, constitutional rights, and human rights of every person jailed, detained, or imprisoned in the Essex County Correctional Facility ("ECCF" or "the facility"); and

WHEREAS, Section 2-75(A)(1) of the Essex County Code requires that the Essex County Department of Corrections "[o]perate and maintain in a safe, sanitary and humane manner the County jail [...] as required by federal and state laws, rules and regulations"; and

WHEREAS, a civilian task force will assist the ECCF in both meeting their responsibilities to the individuals incarcerated and/or detained at the ECCF and to foster positive relations between the ECCF and the citizens of Essex County; and

WHEREAS, the County Executive has proposed that the Essex County Administrative Code be amended to establish within the Essex County government an Essex County Correctional Facility Civilian Task Force ("Task Force"), pursuant to the authority of N.J.S.A. 40:41A-41; now, therefore, be it; and

ORDAINED by the Board of Chosen Freeholders of the County of Essex ("BOCF") in the State of New Jersey as follows:

1. PURPOSE AND INTENT

The purpose and intent of the Task Force is to provide public oversight, transparency and accountability with respect to the policies, procedures, practices, supervision, management, and training at the ECCF. The Task Force is dedicated to protecting the lives, health, safety, and rights of all people confined at the ECCF and ensuring that the conditions of their confinement are safe, sanitary, respectful, and humane. The Task Force shall review systemic concerns, make detailed recommendations to the County Executive, the ECCF administration and the BOCF and engage with people detained, jailed, or incarcerated in the ECCF. The Task Force's processes shall be fair, impartial, consistent, thorough, timely, understandable, and transparent. The Task Force shall reflect the diversity of the community and bring the community's voices, priorities, and experiences to bear in improving ECCF policies, procedures, practices, supervision, management, and training.

2. ESTABLISHMENT

There is established the Essex County Correctional Facility Civilian Task Force, an independent, non-departmental entity within the governing body of Essex County.

3. COMPOSITION OF TASK FORCE

A. *Membership.* The Task Force shall consist of nine (9) members, appointed by the Essex County Executive with the advice and consent of the BOCF.

- 1) The Task Force membership shall be composed as follows: one (1) shall be a representative from a recognized detainee advocacy group such as First Friends; one (1) shall be a representative from a recognized inmate advocacy group; one (1) shall be a member in good standing of the New Jersey Criminal Defense Bar; one (1) shall be a ~~demonstrated~~ corrections expert, **who shall be a current, former or retired State or County corrections officer in the State of New Jersey and active member of the NJSPBA and/or FOP**; one (1) shall be a formerly incarcerated individual; one (1) shall be a social justice advocate; one (1) shall be an expert in the medical field; and one (1) shall be a member of the public, all appointed with the advice and consent of the BOCF.
- 2) The County Executive shall appoint one (1) additional member of the public to serve as Chair of the Task Force, appointed with the advice and consent of the BOCF.
- 3) The County Executive may appoint an Executive Director of the Task Force who shall oversee the administration of the Task Force.
- 4) In selecting members to serve on the Task Force, the County Executive will consider potential members' professional experience in law, civil rights or law enforcement. Member-Nominees shall provide the County Executive with resumes and any other submissions that establish their qualifications to be appointed to the Task Force and such information shall be provided to the BOCF for its review and consideration. The County Executive shall retain the authority to remove any of the above-mentioned members for cause and designate another for appointment.
- 5) In the event of a vacancy on the Task Force during the term of office of a member by reason of removal, death, resignation, or otherwise, a successor shall be chosen in the same manner as the original appointment. A member appointed to fill a vacancy shall serve for the balance of the unexpired term. Vacancies shall be filled within sixty (60) days.
- 6) The term of the members shall be three years, except that of the members first appointed, four (4) shall be appointed for terms of one (1) year and four (4) shall be appointed for terms of two (2) years. The term of the Chair shall be three (3) years. A term shall start on January 1st and end on December 31st. No person serving continuously for six (6) years shall be eligible for reappointment until the lapse of three years.
- 7) The Task Force shall be constituted with full membership within six (6) months of its establishment.

B. *Conflicts and limitations.* A person may not serve on the Task Force if the person or a member of the person's immediate family:

- 1) is or has within the last five (5) years been employed by or participated in the

management of a business entity or other organization that has, within the last five years, contracted with or received funds from the ECCF, the Essex County Sheriff's Office, any other Essex County governmental entity, or U.S. Immigration and Customs Enforcement;

- 2) owns or controls, directly or indirectly, any interest in a business entity or other organization that has, within the last five years, contracted with or received funds from the ECCF, the Essex County Sheriff's Office, any other Essex County governmental entity, or U.S. Immigration and Customs Enforcement;
- 3) uses or receives any amount of tangible goods, services, or funds, with the exception of public benefits from the ECCF, the Essex County Sheriff's Office, any other Essex County governmental entity, or U.S. Immigration and Customs Enforcement;
- 4) is required to register as a lobbyist or consultant because of the person's activities for compensation on behalf of a profession related to the operations of the ECCF, the Essex County Sheriff's Office, any other Essex governmental entity, or U.S. Immigration and Customs Enforcement; or
- 5) is currently employed or has been employed within the last two (2) years by the County of Essex.

C. *Diversity.* The County Executive and the BOCF shall seek to ensure that the Task Force reflects the County's diverse population. Dimensions of diversity should include, at a minimum: income level, race, ethnicity, age, gender, gender identity or expression, sexual orientation, country of origin, religion, nationality, and disability.

D. *Chair and Executive Director.* The County Executive shall appoint the Chair of the Task Force, with the advice and consent of the BOCF. The County Executive may appoint an Executive Director of the Task Force who shall oversee the administration of the Task Force. The Term of the Executive Director shall be three (3) years.

4. TRAINING

A. Each member shall successfully complete a training program, mutually agreed upon by the County and the Task Force and at the County's expense, within six (6) months of appointment. Failure to complete the training may result in disqualification.

5. RESPONSIBILITIES

A. *Jurisdiction.* The Task Force shall have the authority to *sua sponte* review and examine the actions of the ECCF with respect to systemic incidents and concerns.

- 1) The review extends to both the conduct of all personnel involved in a systemic incident and to those personnel who examine a systemic incident for disciplinary or other purposes.
- 2) As a general matter, the Task Force's review and examination shall not precede or be concurrent with ECCF actions, but shall occur after the ECCF has completed all proceedings related to the incident or action under review, including investigative,

criminal, disciplinary, and other proceedings. If, however, the Task Force learns of any potential for imminent danger of serious abuse or neglect of, or other harm to, a detainee or inmate, the Task Force must immediately inform the ECCF administration so that the ECCF may take appropriate action.

- 3) Reviews shall be initiated within one-hundred and twenty (120) days of occurrence, the Task Force's knowledge of the occurrence, or the time at which the Task Force is authorized to begin review, whichever is latest. Nothing shall preclude the Task Force from reviewing a matter that is older than one-hundred and twenty (120) days so long as it initiates a review within that time-period upon learning of the occurrence. The Task Force shall exercise appropriate caution in reviewing an incident that is not recent, but it shall act on the recognition that no matter how old an incident is it may hold lessons for the future.
- 4) The Task Force shall have the authority to identify and review systemic incidents and concerns in ECCF policies, procedures, practices, supervision, management, and training. The Task Force's review must comply with all existing laws, regulations and policies and procedures of the ECCF. The Task Force's review shall not adversely jeopardize the safety and security of the facility.
- 5) The Task Force shall not inquire about any individual's immigration status, citizenship, or country of birth, unless the information is necessary to conduct a review of an incident or concern.
- 6) The Task Force may receive individual complaints from ECCF detainees, ECCF inmates, or third parties. All complaints will be forwarded to the ECCF administration to allow for resolution through the administrative process if applicable. Complaints may be submitted to the Task Force anonymously.

B. *Protection against retaliation and intimidation.* A civil action may not be brought against any member of the Task Force for good faith performance of responsibilities under this Ordinance. Retaliation or discrimination, actual or threatened, or any form of intimidation against any witness, ECCF employee, or other person involved in the review process or otherwise cooperating with the Task Force; or conduct that could reasonably be perceived as retaliatory, discriminatory, threatening, or intimidating by ECCF employees against anyone for their involvement in the review process:

- 1) is expressly prohibited;
- 2) shall be regarded as a separate and distinct incident, regardless of any action taken with respect to the underlying incident; and
- 3) may result in discipline, up to and including termination of employment, subject to collective bargaining agreements.
- 4) This section is not intended to infringe on the rights of an employer to supervise, discipline, or terminate an employee for other reasons.
- 5) In order to minimize the risk of retaliation, discrimination, or intimidation, the ECCF must monitor incidents involving detainees and/or inmates known to have cooperated or been involved in a Task Force review.
- 6) On the first day of each month, the ECCF must update the Task Force regarding each detainee or inmate currently held at ECCF who the ECCF or any of its employees knows has cooperated with or been involved in the Task Force's work within the previous six (6) months. For each such detainee or inmate, the ECCF must note each disciplinary sanction, loss of privileges, use-of-force incident, change of housing

status, or other incident of note that has taken place with regard to that inmate or detainee in the previous month.

- 7) If the Task Force concludes that retaliation, discrimination, or intimidation has taken place as a result of an inmate or detainee's cooperation with or involvement of any kind in the Task Force's work, it shall immediately inform the ECCF administration, so that the ECCF may take appropriate action.

C. *Information gathering methods.* The Task Force may review the actions of the ECCF and any involved employees, and may inspect, examine, or assess all aspects of the ECCF's operations and conditions including, but not limited to: staff recruitment, training, supervision, and discipline; deaths or serious injuries; incidences of physical and sexual assault; medical and mental-health care; use of force; violence; conditions of confinement; inmate/detainee/prisoner disciplinary processes; use of administrative segregation and other forms of segregation; grievance processes; substance-abuse treatment; access to mail; food and drink; educational, vocational, and other programming; family visitation and communication practices; and rehabilitation, reentry and integration practices, excluding any policies or procedures which could jeopardize the safety and security of the facility or those that are deemed confidential. The Task Force shall utilize a range of methods to gather and substantiate facts, including:

- 1) Gathering information from inmates, detainees, third parties, and publicly available sources. All information gathering must comply with the policies and procedures of the ECCF and ICE.
- 2) Questioning the ECCF Director, Deputy Director, Warden, and any involved employees;
- 3) Making announced or unannounced visits to any part or all of the facility, with one (1) hour advance notice coordinated by the Chair. The Task Force shall adopt procedures to ensure that unannounced visits are conducted in a reasonable manner. The provisions of this section shall not be construed to limit or impair the authority of the ECCF administration to refuse admittance to the jail if the visit would jeopardize the safety and security of the ECCF; and
- 4) Obtaining and reviewing records and other materials from the ECCF which are necessary for review. The Task Force's review must comply with all existing laws, regulations and policies and procedures of the ECCF. The Task Force's review shall not adversely jeopardize the safety and security of the facility.

D. *Access to facilities.* The Task Force shall have reasonable access to the ECCF at all times necessary to conduct a full review of an incident or to conduct a facility inspection. This authority includes the opportunity to interview, with informed consent, any person detained, jailed, or incarcerated at the ECCF, any ECCF employee, or any other person who might be reasonably believed to have knowledge relevant to an inspection or an incident under review. The Task Force shall have access to all ECCF facilities, including all areas which are used by inmates or detainees, all areas which are accessible to inmates or detainees, and to programs for inmates or detainees. Access shall be for purposes including, but not limited to, providing information about individual rights and the functions of the Task Force, including the name, address, and telephone number of the office, monitoring compliance with respect to the rights and safety of inmates, and inspecting and viewing all areas of the facility. Members of the Task Force are prohibited

from bringing electronic devices within the secured perimeter of the ECCF. The Task Force may request the ECCF Administration to take pictures, videos or audio recordings, as deemed necessary. Members of the Task Force are permitted to make unannounced visits to the ECCF upon coordination with the Chair, and require one (1) hour advance notice to access ECCF facilities or interview individuals detained, jailed, or incarcerated therein. All such interviews must comply with the policies and procedures of the ECCF and ICE. The provisions of this section shall not be construed to limit or impair the authority of the ECCF administration to refuse admittance to the jail if the visit would jeopardize the safety and security of the ECCF

- E. *Interviews and communications.* The Task Force shall have the authority to reasonably meet, interview, and communicate privately and confidentially with any person, including ECCF employees and people detained, jailed, or incarcerated at the ECCF, both formally and informally, by telephone, mail, and in person. All interviews and communication must comply with the policies and procedures of the ECCF and ICE.
- 1) Written communications between the Task Force and people detained, jailed, or incarcerated at the ECCF shall be deemed "legal correspondence", and shall only be opened and inspected for contraband in the presence of the inmate/ICE Detainee to whom it is addressed and shall not be read or copied.
 - 2) Any ECCF staff or employees interviewed may be accompanied by their union representative, if applicable, and/or their chosen counsel. Such counsel and/or representative may advise the person interviewed as circumstances may warrant, but may not otherwise participate in the proceeding.
- F. *Records and information.* The Task Force shall have the right to access, inspect, and copy all records in the possession or control of the ECCF that the Task Force considers necessary in review of systemic incidents and concerns or inspection of the facility, except those prohibited from disclosure by law, such as HIPAA protected information and the contents of Internal Affairs files.
- 1) Following notification from the Task Force with a written request for access to agency records, a designated ECCF employee shall provide the Task Force with access to the requested documentation not later than seven (7) business days after the Task Force's written request for the records. The Task Force's review must comply with all existing laws, regulations and policies and procedures of the ECCF. The Task Force's review shall not adversely jeopardize the safety and security of the facility.
 - 2) Upon notice and a request by the Task Force, a county government agency or entity that has public records that are relevant to a review conducted by the Task Force shall provide the Task Force with access to such records.
 - 3) The Task Force shall work with the ECCF to minimize disruption to the operations of the ECCF due to Task Force activities and shall comply with the ECCF's security clearance processes.
 - 4) The Executive Director shall have the ability to review sensitive or confidential records in-camera for the purposes of determining their nexus or relevance to the

matter under review. Upon an in-camera review, the Executive Director may, if he/she deems necessary, provide an Executive Summary and/or a redacted version of the records to the Task Force for its use.

- G. *Confidentiality* Correspondence and communication with the Task Force shall be confidential and protected as privileged in the same manner as legal correspondence or communication.
- 1) The Task Force shall establish confidentiality rules and procedures for all information maintained by the office.
 - 2) The Task Force shall treat all matters under review, including the identities of individuals from whom information is acquired, as confidential, except as far as disclosures may be necessary to enable the Task Force to perform the duties of the office and to support any recommendations resulting from a review. Names and confidential identifying information of individuals involved in a review will not be disclosed except when that individual has given informed consent. Confidential identifying information shall include, but not be limited to, social security numbers, alien numbers, inmate numbers, driver's license numbers, home addresses, immigration status, country of birth, county of citizenship, and identifying biographical information.
 - 3) Upon receipt of information that by law is confidential or privileged, the Task Force shall maintain the confidentiality of such information and shall not further disclose or disseminate the information except as provided by applicable state or federal law or as authorized by this section.
 - 4) Written communications between the Task Force and people detained, jailed, or incarcerated at the ECCF shall be deemed "legal correspondence", and shall only be opened and inspected for contraband in the presence of the inmate/ICE Detainee to whom it is addressed and shall not be read or copied.
 - 5) The Task Force shall immediately forward to the ECCF administration any information obtained in the course of Task Force activity to prevent reasonably certain death, substantial bodily harm, issues of health or safety or the commission of a crime.
 - 6) The Task Force shall not reveal records or the names and/or confidential identifying information about individual ECCF employees or staff to the public.

6. REPORTS AND RECOMMENDATIONS

- A. *Issuance of Reports.* When the Task Force has completed a review of a systemic incident or concern, it may produce a report, as deemed appropriate.
- 1) The Task Force shall issue all reports to the County Executive, the ECCF administration and the BOCF.
 - 2) The Task Force may issue an interim report at any time it deems appropriate, provided that the Task Force shall not issue any report before completion of all investigative, criminal, disciplinary and other proceedings related to the matter.
 - 3) ECCF administration shall be provided the opportunity to review reports and provide feedback about them to the Task Force before their dissemination to the County Executive and the BOCF.
 - 4) ECCF administration shall be encouraged to develop and implement in a timely

fashion action plans to rectify issues identified in those reports, excluding those policies or procedures which could jeopardize the safety and security of the facility or those that are deemed confidential.

- 5) In response to any recommendation by the Task Force, the ECCF administration must report, within ten (10) business days, to the County Executive, the BOCF and the Task Force to confirm whether or not they have taken the recommended action. If the latter, the ECCF administration must explain to the County Executive, the BOCF and the Task Force their reasons for declining to take the recommended action. After the issuance of recommendations by the Task Force and the required response from the Administration, the Task Force may make the reports available to the public within five (5) business days.
- 6) The Task Force shall continue to assess and report on previously identified problems and the progress made in resolving them until the problems are resolved.
- 7) The Task Force's reports or recommendations do not constitute agency action.

B. *Content of Reports.* Following review of a systemic incident or concern, the Task Force's reports shall describe in detail its work and conclusions, including:

- 1) All facts found that bear on its conclusions;
- 2) Whether and how, under the facts found, the ECCF is responsible for harm, mistreatment, misconduct, inappropriate conditions, or other policies or practices contrary to its mandate to provide safe, humane care for the people confined at the ECCF;
- 3) Specific recommendations for remedying and protecting against future instances of harm, mistreatment, misconduct, inappropriate conditions, or other policies or practices contrary to the ECCF's mandate to provide safe, humane care for the people confined at the ECCF and specific recommendations for improving policies, procedures, practices, supervision, management, or training at the ECCF;
- 4) Information for people confined at the ECCF and their family members, as well as ECCF employees, regarding the rights of people in ECCF custody.
- 5) The Task Force shall protect the confidentiality of those persons who provided information unless their written consent is obtained. Confidentiality shall include redaction of names and confidential identifying information. Recommendations may include summaries of aggregated demographic information where appropriate.
- 6) No report or recommendation shall preclude action by the judicial system, nor an individual's ability to pursue other available avenues of administrative or legal redress. No report or recommendation shall have any collateral effect upon a subsequent administrative or judicial proceeding.

C. *Annual Reports.* The Task Force shall produce annual reports that are useful to policymakers:

- 1) The Task Force shall issue annual reports to the County Executive, the ECCF administration and the BOCF.
- 2) The annual report shall describe the Task Force's work in fulfilling its purpose, duties, and responsibilities.
- 3) The annual report shall describe in detail the Task Force's recommendations for

changes in policies, procedures, practices and training at the ECCF.

- 4) The Task Force shall include data tracking, including but not limited to the number of review processes undertaken and the outcome of those review processes, including the patterns and trends in incidents, and problems raised and addressed, including year-to-year comparisons that can help identify concerns, deter misconduct, and inform policy and practice improvements.
- 5) The Task Force shall protect the confidentiality of those persons who provided information unless their written consent is obtained. Confidentiality shall include redaction of names and confidential identifying information. Recommendations may include summaries of aggregated demographic information where appropriate.
- 6) No report or recommendation shall preclude action by the judicial system, nor a complainant's ability to pursue other available avenues of administrative or legal redress. No report or recommendation shall have any collateral effect upon a subsequent administrative or judicial proceeding.

D. *Emergency Reports.* If the Task Force determines that a detainee or inmate is in imminent danger of serious abuse or neglect or other serious harm, the Task Force shall make an immediate report of its findings and recommendations to the ECCF administration.

- 1) The Director of the ECCF or his designee shall receive and, where appropriate, take immediate action on any such emergency report and recommendation.
- 2) In the event the Task Force makes an emergency report and recommendation to the ECCF administration, the Task Force will immediately notify the County Executive and the BOCF that it has done so and of the contents of said report and recommendation.
- 3) Upon receiving an emergency report and recommendation, the Director or his designee shall immediately notify all personnel who must be notified in order for a decision regarding the emergency recommendation to be made.
- 4) Within forty-eight (48) hours after receiving an emergency report and recommendation, the Director or his designee shall inform the County Executive, the BOCF and the Task Force whether or not the ECCF has chosen to follow the relevant recommendation.
- 5) The existence of an emergency report and recommendation shall not preclude the Task Force from further reviewing the incident in question.

7. MEETINGS

A. *Meeting requirements.* The Task Force shall meet four (4) times per year, or more frequently as deemed necessary. At least one meeting of the Task Force shall be open to the public.

8. SELF-EVALUATION

A. *Self-evaluation provisions.* At the end of the third (3rd) year of the Task Force's creation and every three (3) years thereafter, the Task Force shall undertake a detailed self-evaluation.

- 1) This detailed self-evaluation shall include a candid assessment about the strengths, weaknesses, successes and failures of the Task Force. It shall also contain recommendations as to whether the Task Force should continue in existence and if so, any recommended revisions to its responsibilities and operations and whether an independent management audit should be conducted.
- 2) The self-evaluation shall be submitted to the County Executive and the Board of Chosen Freeholders ("BOCF") and made available to the public, subject to applicable privileges and protections.
- 3) Within one (1) year following the publication of the self-evaluation, the Task Force shall provide a written report to the County Executive and the BOCF regarding the status of the implementation of the recommendations identified in the self-evaluation. This written report shall be made available to the public, subject to applicable privileges and protections

9. COOPERATION OF COUNTY OFFICIALS

A. *Nature and scope of cooperation.* County officials shall use good faith efforts to cooperate with the Task Force.

- 1) The ECCF shall cooperate with Task Force reviews by allowing the Task Force reasonable access to the ECCF and to speak with people employed and confined there, and provide to the Task Force upon reasonable request public records and other public materials which are rationally related to their review.
- 2) County officials shall promptly refer to the Task Force instances of misconduct, conditions, policies, practices, and incidents falling within the Task Force's jurisdiction. County officials and employees shall make all efforts to ensure the preservation of related recordings and documents.
- 3) ECCF administration shall receive and review reports and recommendations of the Task Force and take such actions as may be appropriate in response.
- 4) Nothing herein shall be read or construed to abolish, transfer, or curtail the power and duties of any elected official.
- 5) The provisions of this Ordinance shall not be construed to limit or impair the authority of the ECCF Director to discipline members of the ECCF, adopt or amend policies and/or procedures of the ECCF, or investigate complaints or incidents to which the ECCF is made known.

Approved as to form and legality

Courtney Recore
ESSEX COUNTY COUNSEL

RECORD OF VOTE: X=Vote N.V.=Abstention ABS=Absent

FIRST READING

Moved by Freeholder Sebold
Seconded by Freeholder Richardson

SECOND READING

Moved by Freeholder Cooper
Seconded by Freeholder Pomares

Freeholder	Yes	No	N.V.	ABS	Freeholder	Yes	No	N.V.	ABS
COOPER				✓	COOPER			✓	
GILL, PRESIDENT	✓				GILL, PRESIDENT	✓			
GRAHAM				✓	GRAHAM	✓			
JOHNSON	✓				JOHNSON	✓			
LUCIANO	✓				LUCIANO	✓			
MERCADO	✓				MERCADO				✓
POMARES	✓				POMARES	✓			
RICHARDSON, V.P.	✓				RICHARDSON, V.P.	✓			
SEBOLD	✓				SEBOLD	✓			

Date Mailed to Municipal Clerks 10-25-19
Date Public Hearing 11-6-19
Date Published 10-24-19

Date Mailed to Municipal Clerks 12/20/19
Date Published 12/19/19

It is hereby certified that the foregoing Ordinance was adopted () defeated () tabled by roll call vote at Regular meeting of the Board of Chosen Freeholders of the County of Essex, New Jersey, held on Oct. 23, 2019

It is hereby certified that the foregoing was adopted () defeated () tabled by roll call vote at Regular meeting of the Board of Chosen Freeholders of the County of Essex, New Jersey, held on Dec. 11, 2019

Brendan W. Gill
Brendan W. Gill, President

Brendan W. Gill
Brendan W. Gill, President

The foregoing Ordinance has been duly presented to me on I hereby approve () disapprove the same on Returned and filed 12-13-19

Deborah Davis Ford
Deborah Davis Ford, Clerk

Joseph N. DiVincenzo
Joseph N. DiVincenzo, County Executive

Ordinance – Establishing Civilian Task Force – Correctional Facility

10/21/19

RECEIVED
CLERK OF THE BOARD
2019 OCT 21 PM 4:41
ESSEX COUNTY
BOARD OF
CHOSEN FREEHOLDERS