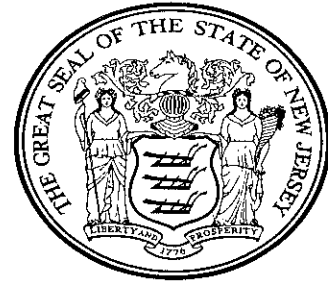


STATE OF NEW JERSEY
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION ON CIVIL RIGHTS
DCR DOCKET NO. AQ11WM-66721



In re Jackson Township
Ordinance Nos. 03-17, 04-17 and
20-17

Administrative Action

SUBPOENA DUCES TECUM

THE STATE OF NEW JERSEY, to:

Helene Schlegel, Business Administrator
Jackson Township
95 Veterans Highway
Jackson, New Jersey 08527

RECEIVED
NOV - 8 2017

You are hereby commanded to appear at and produce to the New Jersey Division on Civil Rights or to its representative, **J. Manuel Castillo, Supervising Investigator**, on or before **November 29, 2017**, at its offices located at **31 Clinton Street, 3rd Floor, Newark, New Jersey 07102**, the documents and information listed in the attached Schedule A.

In lieu of your appearance, you may provide the documents and information identified in the attached Schedule on or before the return date at the address listed above by Certified Mail, Return Receipt Requested, addressed to the attention of **J. Manuel Castillo, Supervising Investigator**. You may, at your option and expense, provide certified, true copies in lieu of the original documents identified in the attached Schedule by completing and returning the Certification attached hereto.

Failure to comply with this subpoena may render you liable for contempt of court and such other penalties as are provided by law. This subpoena is issued pursuant to the authority set forth in N.J.S.A. 10:5-8.

DATE:

11-8-17

A handwritten signature in black ink, appearing to read "Craig Sashihara", written over a horizontal line.

Craig Sashihara, Director
NJ DIVISION ON CIVIL RIGHTS

INSTRUCTIONS

- A. Unless otherwise noted, the relevant time period for which documents are requested pertain to the period from **January 1, 2015 to present**. In each instance in which a document is produced in response to a request, the current edition should be produced together with all earlier editions, or predecessor documents serving the same function during the relevant time period, even though the title of earlier documents may differ from current versions.
- B. The document request calls for all described documents in your possession, custody or control without regard to the person or persons by whom or for whom the documents were prepared (e.g., your directors, administrators, employees, teachers, or others).
- C. Submit production in written and electronic format.
- D. The following procedures shall apply to the production, inspection and copying of paper documents:
 - i. The producing parties shall produce original, complete documents. Documents shall be produced in the order that the documents are maintained in the producing party's files, in original folders, with the folder's original file tabs.
 - ii. All attachments to responsive documents shall be produced attached to the responsive documents.
 - iii. No portion of any documents will be masked and the entire document shall be produced.
 - iv. The producer shall label each group of documents in the following manner: Response to Document Request No. 1; Response to Document Request No. 2, etc., and attach the label to the corresponding documents.
 - v. The producer will provide a key to all abbreviations used in the documents. The key will be attached to the appropriate documents.
- E. This Request is directed to Jackson Township, as well as any Township officials, Township Council members, committee members, administrators, including any employees, representatives, agents, attorneys, affiliates, successors, assigns or any individual or entity acting or purporting to act on its behalf.
- F. If one or more documents or any portions thereof requested herein are withheld under a claim of privilege or otherwise, identify each document or portion thereof as to which the objection is made, together with the following information:

- i. Each author or maker of the document;
 - ii. Each addressee or recipient of the document or person to whom its contents were disclosed or explained;
 - iii. The date thereof;
 - iv. The title or description of the general nature of the subject matter of the document and the number of pages;
 - v. The present location of the document;
 - vi. Each person who has possession, custody or control of the document; and
 - vii. The basis on which the objection is made.
- G. In the event that any document that would have been responsive to this Request has been destroyed or discarded, identify that document and also include:
- i. The date of the document's destruction or discard;
 - ii. The reason for the destruction or discard; and
 - iii. The persons authorizing and/or carrying out such destruction or discard.

DEFINITIONS

1. "You," "your," and "Township" means Jackson Township, as well as any Township officials, the Mayor, Council members, committee members, administrators, and includes any employees, representatives, agents, attorneys, affiliates, successors, assigns or any individual or entity acting or purporting to act on its behalf.
2. "Document" or "material" include writings, recordings, drawings, graphs, photographs, phone records, compact discs, video cassettes, computer files, electronic/magnetic files of any type and any other data compilations from which information can be obtained and translated, if necessary, by use of detection devices into reasonably usable form.
3. "Any" includes "all" and vice versa.
4. "Person[s]" means any natural person, individual, any entity (whether partnership, corporation, limited liability company or corporation, trust, estate, incorporated or unincorporated association or cooperation), any governmental agency or entity and any other legal or commercial entity however organized.

5. The conjunctions “and” and “or” shall be interpreted conjunctively and shall not be interpreted disjunctively to exclude any information otherwise within the scope of this Request. References to the singular include the plural and references to the plural include the singular.
6. The terms “all” and “each” shall be construed as all and each.
7. The terms “his” or “he” shall refer to either gender and is intended to be gender-neutral.
8. “Concerning” means relating to, pertaining to, referring to, describing, evidencing or constituting.
9. “Ordinance No. 03-17” refers to the Jackson Township Ordinance 03-17, amending Chapter 244, which was adopted on March 16, 2017.
10. “Ordinance No. 04-17” refers to the Jackson Township Ordinance 04-17, amending Chapter 244, which was adopted on March 16, 2017.
11. “Ordinance No. 20-17” refers to the Jackson Township Ordinance 20-17, amending Chapter 372, which was adopted on September 12, 2017.
12. “§372-8” refers to the Jackson Township Code §372-8 entitled “Obstruction of Streets Restricted.”
13. “Township” means Jackson Township, Ocean County, New Jersey, including but not limited to the Mayor, Council members, committee members, administrators, and includes any employees, representatives, agents, attorneys, affiliates, successors, assigns or any individual or entity acting or purporting to act on its behalf.
14. “Eruv” or “eruv” means a demarcation of an area under Jewish law.
15. “Lechis” means strips of wood or plastic attached to the sides of certain telephone or utility poles or wires.

Schedule A

1. All materials related to the Township's proposal, consideration of, or decision to apply to §372-8 to the installation of lechis on utility poles located in the Township.
2. All materials, including notes, documents, minutes, video or audiotape recordings, transcripts, correspondence, and photographs from any Township Council meeting related to eruv or Ordinance 20-17, including but not limited to the Township Council Meetings held on August 22, 2017 and September 12, 2017.
3. All materials, including notes, documents, minutes, video or audiotape recordings, transcripts, correspondence, and photographs from any Township meeting, whether a regularly held or special meeting, in which the Mayor, Council members, or any Township staff discussed concerns, questions, comments, or proposals related to the presence or construction of an eruv within the Township or placement of lechis on utility poles located in the Township.
4. Full social media postings, including all comments on each post, created and/or commented on by the Mayor, Council members, or any Township staff member regarding the posting or affixation of any materials to utility poles located in the Township or the application of §372-8 to the posting or affixation of any materials to utility poles located in the Township.
5. Full social media postings, including all comments on each post, considered, created and/or commented on by the Mayor, Council members, or any Township staff member, related in any way to concerns or questions about the presence of or construction of an eruv within the Township or placement of lechis on utility poles located in the Township.
6. Full social media postings, including all comments on each post, considered, created and/or commented on by the Mayor, Council members, or any Township staff member, related in any way to Ordinance 20-17.
7. All materials related to complaints or comments, written or verbal, received by the Township, from any person, regarding the presence of or construction of an eruv within the Township or placement of lechis on utility poles located in the Township.
8. All materials related to complaints or comments, written or verbal, received by the Township, from any person, regarding the presence of Orthodox Jews or members of any other religious faith in the Township.
9. All communications (including emails and text messages) made or received by the Mayor, Council members, or any Township staff member regarding the posting or affixation of any materials to utility poles located in the Township or Ordinance 20-17.
10. All violation notices issued for alleged violations of §372-8.
11. All requests received concerning installation or maintenance of an eruv in the Township.

12. All responses provided by any Township official to any request received by the Township concerning installation or maintenance of an eruv in the Township.
13. For each Township official who played a role in the decision to apply §372-8 to the attachment of lechis on utility poles located in the Township, identify the official by name, position, and role in the decision(s).
14. All materials, including notes, documents, minutes, video or audiotape recordings, transcripts, correspondence, and photographs from any Township Council meeting related to Ordinance 03-17, including but not limited to the Township Council Meetings held on January 24, 2017, February 28, 2017 and March 16, 2017.
15. All materials, including notes, documents, minutes, video or audiotape recordings, transcripts, correspondence, and photographs from any Township Council meeting related to Ordinance 04-17, including but not limited to the Township Council Meetings held on January 24, 2017, February 28, 2017 and March 16, 2017.
16. All materials, including notes, documents, minutes, video or audiotape recordings, transcripts, correspondence, and photographs from any Township meeting, whether a regularly held or special meeting, in which the Mayor, Council members, or any Township staff discussed concerns, questions, comments, or proposals related to the presence or construction of private schools or dormitories in the Township.
17. All inquiries received by the Township concerning the construction of or placement of private schools or dormitories in the Township.
18. All approvals given by the Township concerning the construction of or placement of private schools or dormitories in the Township.
19. All communications (including emails and text messages) made or received by the Mayor, Council members, or any Township staff member regarding the construction or placement of private schools or dormitories in the Township.
20. All communications (including emails and text messages) made or received by the Mayor, Council members, or any Township staff member regarding Ordinance 03-17 or Ordinance 04-17.

CERTIFICATION OF TRUE COPY

I, _____, hereby certify that each of the documents annexed hereto is a true and exact copy of the entire document, that the existence of any other requested documents are unknown to me, and that if such documents become known to be later, I shall serve them promptly on the New Jersey Division on Civil Rights.

I understand that if my response to the Subpoena is willfully false, I am subject to punishment.

DATED:

Signature

Title or Position