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		: SUPERIOR COURT OF NEW JERSEY
		: LAW DIVISION - CUMBERLAND COUNTY
NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION, and	:	
THE COMMISSIONER OF THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION;	:	DOCKET NO.
	:	
Plaintiffs,	:	<u>Civil Action</u>
	:	COMPLAINT
v.	:	
NATURE'S CHOICE CORPORATION,	:	
NATURE'S CHOICE ACQUISITION COMPANY, DEERFIELD ORGANICS, LLC, HARVEST GARDEN STATE, LLC, HARVEST POWER, INC., RELIABLE PAPER RECYCLING, INC., RELIABLE WOOD PRODUCTS, LLC, NICHOLAS VENE,	:	
individually, LEONARD PIRRELLO, individually, DAVID HITCHCOCK, individually, "XYZ CORPORATIONS" 1-10 (Names Fictitious); and "JOHN AND/OR DOES" 1-10 (Names Fictitious),	:	
	:	
Defendants.	:	
	:	

Plaintiffs, the New Jersey Department of Environmental Protection (the "Department" or "DEP"), and the Commissioner of

the New Jersey Department of Environmental Protection (the "Commissioner"), by and through their attorney, file this Complaint against the above-named Defendants, and allege as follows:

STATEMENT OF THE CASE

1. This is a civil action brought to enforce the requirements of an Administrative Consent Order, as well as to seek penalties and injunctive relief for violations of the Solid Waste Management Act ("SWMA"), N.J.S.A. 13:1E-1.1 to -48, and the Water Pollution Control Act ("WPCA"), 58:10A-1.1 to -20.
2. The Department issued approval for a recycling operation to Defendant Nature's Choice Corporation in October 2005, for a property located at 1310 Route 77, Upper Deerfield Township, Cumberland County, New Jersey, Block 905, Lots 6 and 7 on the Upper Deerfield Township tax map ("Site").
3. Upper Deerfield Twp. and the surrounding communities are low-income and suffer from high unemployment. Historically, across the country, such communities have been disproportionately exposed to high-polluting facilities and to the resultant threats of high levels of air, water, and soil pollution, and accompanying potential for increased public health impacts.

4. Residents of all communities should receive fair and equitable treatment in matters affecting their environment, community, homes, and health without regard to a community's socio-economic condition. See, e.g., Exec. Order No. 23 (April 20, 2018), 50 N.J.R. 1241(b) (May 21, 2018).
5. From as early as 2003 until 2018, Defendants operated the Site as a recycling center for mulch and compost, collecting yard trimmings, grass, leaves, and other materials from throughout the region.
6. Defendants failed to properly sort and remove plastics, wood, metals, and other solid waste materials from the shipments to the Site. Instead, Defendants engaging in unlawful dumping, by either burying the materials in a large berm or creating piles of solid waste on the Site that they then abandoned. Defendants also operated the Site without a required New Jersey Pollutant Discharge Elimination System ("NJPDDES") permit for stormwater discharges.
7. DEP investigated the Site numerous times throughout its operating history, and attempted to work with the Defendants to bring the Site into compliance. On February 15, 2012, the Department executed an Administrative Consent Order ("ACO") with Defendant Nature's Choice Corporation.

8. Nature's Choice Corporation and its corporate officials failed to comply with the ACO and failed to address numerous environmental deficiencies on the Site.
9. The Department now seeks compliance by Defendants with all statutory requirements and the imposition of additional civil penalties for Defendant's violation of the SWMA and the WPCA.

THE PARTIES

10. The Department is a principal department within the Executive Branch of the New Jersey State government, vested with the authority to conserve and protect natural resources, the environment, to prevent pollution, and to protect the public health and safety. N.J.S.A. 13:1D-9. The Department maintains its principal offices at 401 East State Street, Trenton, Mercer County, New Jersey.
11. The Commissioner is the Commissioner of the DEP, N.J.S.A. 58:10A-3, and is vested by law with various powers and authority, including those conferred by the DEP's enabling legislation, N.J.S.A. 13:1D-1 to -19.
12. Nature's Choice Corporation is a corporation organized under the laws of the State of New Jersey with a principal place of business at 398 Lincoln Blvd., Building 1, in the Borough of Middlesex, Middlesex County, New Jersey 08846.

13. Nature's Choice Acquisition Company was a corporation organized under the laws of the State of New Jersey with a principal place of business at 1111 Springfield Road, Second Floor, in the Township of Union, Union County, New Jersey 07083.
14. Deerfield Organics, LLC ("Deerfield"), is a corporation organized under the laws of the State of New Jersey with a principal place of business at 1310 Route 77, Upper Deerfield Township, Cumberland County, New Jersey 08302.
15. Harvest Garden State, LLC, ("Harvest Garden State") owns all the stock of defendant Nature's Choice, and was organized as a corporation under the laws of the State of New Jersey with a principal place of business at 1310 Route 77, Upper Deerfield Township, Cumberland County, New Jersey 08302.
16. Harvest Power, Inc. ("Harvest Power") is a corporation formed under the laws of the Commonwealth of Massachusetts, with a principal place of business at 221 Crescent Street, Suite 402, Waltham, Massachusetts.
17. Reliable Wood Products, LLC, is a corporation formed under the laws of the State of New Jersey with a principal place of business at 1 Caven Point Avenue, Jersey City, New Jersey.

18. Reliable Paper Recycling, Inc., is a corporation formed under the laws of the State of New Jersey with a principal place of business at 1 Caven Point Avenue, Jersey City, New Jersey.
19. Nicholas Vene, upon information and belief, is the 50% owner and President of Nature's Choice Corporation. Nicholas Vene is a responsible corporate officer because he exercised direct operational control over Nature's Choice Corporation's operations at the Site.
20. Leonard Pirrello, upon information and belief, is a 50% owner of Nature's Choice Corporation. Leonard Pirrello is a responsible corporate officer because he shared operational control over the Site with Nicholas Vene.
21. David Hitchcock, upon information and belief, is the Manager of Deerfield. David Hitchcock is a responsible corporate officer of Deerfield because, as Manager, he has authority to make decisions regarding compliance and has operational control of the Site.
22. "XYZ Corporations" 1-10, these names being fictitious, are entities with identities that cannot be ascertained as of the filing of this Complaint, certain of which are corporate successors to, predecessors of, insurers of, or are otherwise related to, defendants Nature's Choice Corporation, Nature's

Choice Acquisition Company, Deerfield, LLC, Harvest Power, Inc., Harvest Garden State, LLC, Reliable Wood Products, LLC, Reliable Paper Recycling, Inc., Nicholas Vene, David Hitchcock and/or Leonard Perillo, and/or persons responsible for the operations at the Property.

23. "John and/or Jane Does" 1-10, these names being fictitious, are individuals whose identities cannot be ascertained as of the filing of this Complaint, certain of whom are partners, officers, directors, and/or responsible corporate officials of, or are otherwise related to, defendants Nature's Choice Corporation, Nature's Choice Acquisition Company, Deerfield, LLC, Harvest Power, Inc., Harvest Garden State, LLC, Reliable Wood Products, LLC, Reliable Paper Recycling, Inc., Nicholas Vene, David Hitchcock and/or Leonard Perillo and/or persons responsible for the operations at the Property.

GENERAL ALLEGATIONS

24. On or about July 26, 2000, DEP issued General Approval No. 0601001450 to Emerald Grow Products Inc. for operation of a Class C recycling facility at the Site.
25. DEP revoked and reissued General Approval No. 0601001450 to Nature's Choice Corporation with an effective date of April 15, 2003.

26. On or about May 8, 2003, Nature's Choice Corporation entered into an asset purchase agreement selling its assets to Nature's Choice Acquisition Company.
27. On or about May 8, 2003, DEP issued a general approval for Nature's Choice Acquisition Company to operate a Class C recycling center at the Site.
28. On or about December 17, 2004, Nature's Choice Corporation executed a deed purchasing the Site from DMR Real Estate Development LLC.
29. Between 2003 and 2005, Nature's Choice Corporation and/or Nature's Choice Acquisition Company brought in multiple loads of unprocessed recyclable material from the towns of East Brunswick, Piscataway, Metuchen, Milltown and Edison. The Site also accepted truckloads of unprocessed commingled yard waste material from Hempstead, New York consisting of leaves, grass, brush, limbs and logs. The Site accepted most of the Hempstead, New York material in plastic bags.
30. In 2004, the Site utilized 90% of its available space, 50% of which was for the storage of the Hempstead, New York material received during a six-month period.
31. In October 2005, Nature's Choice Corporation obtained a Class B/C Recycling Center General Approval ("2005 General



- Approval"), Approval No. REC050002, to accept and process specific types of Class B and Class C materials for resale as mulch and compost at the Site.
32. Upon information and belief, Nicholas Vene and Leonard Pirrello were in charge of the day-to-day operations of Nature's Choice Corporation from at least October 2005 until September 18, 2014, and made all operational decisions regarding the company.
33. On December 27, 2007, the owners of Reliable Paper Recycling, Inc., and Reliable Wood Products LLC entered into a Management Services Agreement with Nature's Choice Corporation in which they assumed operational responsibility for all Nature's Choice Corporation sites, including the Site.
34. On or about February 15, 2009, Nature's Choice Corporation became affiliated with Reliable Wood Products LLC. Upon information and belief, Vene and Pirrello remained in operational control of Nature's Choice Corporation.
35. In 2012, Harvest Garden State, LLC ("Harvest Garden State") acquired Nature's Choice Corporation.
36. On or before September 11, 2014, Harvest Garden State was the sole member of Reliable Wood Products LLC and owned 100% of the corporate stock of Nature's Choice Corporation.

37. On or before September 12, 2014, Harvest Power, Inc. ("Harvest Power") was the sole owner of Harvest Garden State. Upon information and belief, Vene and Pirrello remained in operational control of the Class B/C recycling operation at the Site.
38. On or about September 12, 2014, Harvest Power transferred its membership interest in Harvest Garden State to Nicholas Vene or to an entity to be formed by Nicholas Vene. This transfer did not include the recycling center at the Site.
39. On or about September 11, 2014, Harvest Power informed DEP that Nature's Choice Corporation would transfer its owner/operator interest in the recycling facility at the Site to Deerfield.
40. Deerfield is the current owner and operator of the Site.
41. Upon information and belief, David Hitchcock is in operational control of Deerfield and is responsible for all operational decisions regarding the company.

Solid Waste Management Act Violations

42. "Class B" materials include source-separated trees, tree parts, unpainted or untreated wood products, stumps, etc.

N.J.A.C. 7:26A-1.3. "Class C" materials include source-separated food waste, biodegradable plastic, and yard trimmings.

43. In 2004, 90% of the available space onsite was utilized. Fifty percent (50%) of the utilized space was for storage of truckloads of unprocessed, commingled yard waste material received during a six-month period from Hempstead, New York. This material consisted of leaves, grass, brush, limbs and logs. Most of the Hempstead, New York material was in plastic bags.
44. The 2005 General Approval expired on July 26, 2010, and Nature's Choice Corporation was prohibited from bringing on site any new materials for storage or processing. However, Nature's Choice Corporation was still required to maintain compliance with the terms of the General Approval after its expiration.
45. During the history of operations on the Site, the Department cited Defendants for repeated violations of the SWMA, including multiple Notices of Violation for storing waste plastic bags at the Site for greater than one year.
46. Based upon inspections in 2010, DEP determined that Nature's Choice Corporation failed to comply with provisions of the

2005 General Approval by failing to process incoming materials in a timely fashion and by not properly disposing of recycling process materials. Specifically, Nature's Choice Corporation disposed of plastic bags from incoming loads of leaves directly within the footprint of the recycling facility in violation of N.J.A.C. 726A-4.1(a)(2), and failed to comply with its Approval by failing to separate plastic bags from incoming leaves in violation of N.J.A.C. 7:26A-3.1(a).

47. On February 15, 2012, DEP and Nature's Choice Corporation entered into an ACO, NEA 110001-132084 ("2012 ACO") to resolve the issues identified by DEP's inspections and bring the company's operations into compliance with the 2005 General Approval's provisions. The ACO required Nature's Choice Corporation to:

- a. Process a minimum of 50,000 cubic yards of stockpiled combined leaf compost, tree parts and plastic bags mixture annually, and to report on progress quarterly, until the backlog of unprocessed material was reduced to limits in the 2005 General Approval;
- b. Properly dispose of all separated plastic bags and other waste material, and in the future to store such materials for no longer than six months;
- c. Separate and process tree parts in the Class B portion of the Site;
- d. In the fifth year, to submit a measurement of the

remaining mixed stockpiled material; and

e. Refrain from accepting any new material in the areas of the Site identified as being out of compliance in the 2010 inspection and ACO.

48. Nature's Choice Corporation failed to timely submit all progress reports required by the ACO, and those it submitted indicated that it did not meet the requirements of the ACO.
49. On March 4, 2014, a Department inspector visited the Site and issued a Notice of Violation (PEA 140001-132084) to Nature's Choice Corporation for new violations of the 2005 General Approval and the ACO. Specifically, the inspector determined that Nature's Choice Corporation did not have sufficient equipment on site to process incoming material; had continued to accept incoming material that contained a mix of Class B and Class C materials with a large number of garbage bags; and had continued stockpiling new material rather than processing it in a timely fashion.
50. On July 31, 2014, Nature's Choice Corporation reported that waste from screening operations at the Site -- including, but not limited to, plastic yard waste bags -- had been stockpiled and/or buried in several locations on the Site. The report stated defendant Nicholas Vene directed the burial of some of the waste sometime in 2011 or earlier, and Vene directed

employees to cover the waste with compost or soil to hide the waste from representatives of Harvest Garden State.

51. Marathon Engineering and Environmental Services, Inc. ("Marathon"), an engineering firm retained by Nature's Choice Corporation, discovered waste material buried in a long berm on the north side of the Class B area access road at the Site. This approximately 1,000-foot long berm contained soil mixed with other waste materials consisting mainly of stumps and tree parts, discarded plastic, bags and other rubbish, and stones and cobbles. This waste material is consistent with residuals generated from screening compost material at Class C facilities and constitutes solid waste under the terms of DEP's recycling center rules and the 2005 General Approval.
52. Elsewhere on the Site, Marathon identified a separate pile mainly of discarded plastic bags with some large and small wood parts that were covered with a thin layer of soil and vegetation.
53. On September 11, 2014, Harvest Power notified DEP that Nature's Choice Corporation would transfer its entire ownership and operational interest in the Site and the Facility to Deerfield, and that Deerfield would comply with the 2005 General Approval and 2012 ACO.

54. On January 2, 2015, DEP acknowledged the transfer of ownership and control of the Facility from Nature's Choice Corporation to Deerfield in a letter to Harvest Power. DEP stated that it would not re-issue the expired 2005 General Approval until Deerfield satisfied the regulatory requirements for renewal.
55. On February 20, 2015, Deerfield, as the Principal, and Lexon Insurance Company, as the Surety, executed a performance bond in favor of DEP for \$250,000. The bond provides that the Surety is liable if Deerfield fails to faithfully perform closure of the Facility if it is required to do so.
56. A March 23, 2015 inspection revealed that the Site was within its 2005 Approval limits for the Class B area, but Class C materials far exceeded the 2005 General Approval limit of 72,000 cubic yards of unprocessed Class C material.
57. On October 19, 2017 Deerfield notified DEP that it had suspended all operations at the facility and removed all equipment from the Site.
58. On December 13, 2017, DEP sent a Site Closure Demand letter to Deerfield, and ordered Deerfield to process/remove all recyclable materials and residues for proper disposal within 30 days of that letter in accordance with the 2005 General Approval and N.J.A.C. 7:26A-4.5(a)(11).

59. To date, the Site remains abandoned with no evidence of Class B or Class C processing or disposal activities. The stockpiles appear undisturbed, with weeds and tree overgrowth on the surface and residual solid waste debris protruding from the outer layers of the stockpiles. Residual solid waste buried by the defendants in berms and stockpiles remains on the Site.

Water Pollution Control Act Violations

60. Any industrial facility in which industrial materials may be exposed to rainfall and from which pollutants may enter waters of the State is required to obtain a NJPDES stormwater permit from DEP pursuant to N.J.S.A. 58:-10A-6.

61. The operations at the Site from 2005 to date occurred without a valid NJPDES permit.

62. On January 8, 2015, DEP issued a Notice of Violation ("NOV") to Deerfield for operating the Site without a stormwater permit as required by the WPCA. N.J.A.C. 7:14A-24.2(a). The NOV instructed Deerfield to apply for a stormwater permit.

63. On March 19, 2015, Deerfield submitted its application for a NJPDES permit for stormwater discharges. Deerfield's stormwater permit application was not approved due to



technical deficiencies. Deerfield failed to correct the deficiencies.

64. A final stormwater permit was never issued, and upon information and belief the Site was abandoned in October 2017.

**COUNT 1**

**2012 ACO VIOLATIONS**

65. Plaintiffs incorporate paragraphs 1-64 of this Complaint herein as if fully set forth below;
66. Defendants Nature's Choice Corporation, Harvest Power, Harvest Gardens LLC, Deerfield, Reliable Wood Products, Reliable Paper Recycling, Nicolas Vene, Leonard Pirello, and David Hitchcock were each, at one time or another, owners and/or operators of the Site responsible for compliance with the 2005 General Approval and SWMA.
67. As described in paragraph 46 of this complaint the Defendants were required to take various actions in the ACO to come back into compliance with the 2005 General Approval.
68. To date, Defendants Nature's Choice Corporation, Harvest Power, Harvest Gardens LLC, Reliable Wood Products, Reliable Paper Recycling, Nicolas Vene, Leonard Pirello and David Hitchcock have failed to comply with the requirements of the ACO, which, by its own terms, and pursuant to Rule 4:67-6, is

fully enforceable in Superior Court as a Final Agency Order.

69. Pursuant to R. 4:67-6 and the 2012 ACO, the Department is entitled to summary enforcement of the ACO requiring the Defendant to:

- a. Comply with all conditions of the 2005 General Approval;
- b. Remove from the Site all separated plastic bags and other solid waste materials that are on the surface or buried within piles or berms on the site and dispose/recycle these materials at a properly approved facility;
- c. Submit to the Department for its approval a Corrective Action Plan ("CAP") that includes certified measurements of all processed and unprocessed Class B and C materials on Site, volumes of all non-conforming solid wastes on Site, and a detailed plan and timeline for the processing and removal, or approved disposal of, all materials on Site;
- d. Submit quarterly progress reports pursuant to paragraph 7 of the ACO.

WHEREFORE, the Plaintiffs demand judgment against the Defendants:

- a. Finding each of the Defendants in violation of the ACO;
- b. Ordering each of the Defendants to comply with all conditions of the 2005 General Approval;
- c. Ordering the Defendants to submit a CAP for DEP approval, as described above;
- d. Imposing civil penalties for each day of violation, as determined by the court, in accordance with N.J.S.A. 13:1E-9; and
- e. Granting such other relief as the court deems just and proper.

**COUNT 2**

**CLASS B AND CLASS C APPROVAL VIOLATIONS**

- 70. Plaintiffs incorporate paragraphs 1-69 of this Complaint herein as if fully set forth below;
- 71. Each violation of a permit, license or operating authority shall constitute a separate and distinct violation. N.J.A.C. 7:26A-9.5(b).
- 72. All persons issued a general or limited approval to operate a recycling center for Class B and Class C recyclable material pursuant to this subchapter shall comply with all conditions of the approval. N.J.A.C. 7:26A-3.1(a)

73. Paragraph 77 of the 2005 General Approval requires the holder of the General Approval to process incoming material and separate residue and solid waste materials from recyclable material in a timely manner.
74. Paragraph 81 of the 2005 General Approval requires the holder of the General Approval to maintain a performance bond or irrevocable standby letter of credit in the format specified in N.J.A.C. 7:26A-3.4(d) or (e), respectively, in the amount of \$250,000.00.
75. Defendants Nature's Choice Corporation, Nature's Choice Acquisition Company, Deerfield, Harvest Power, Harvest Gardens LLC, Reliable Wood Products, Reliable Paper Recycling, Nicolas Vene, Leonard Pirello, and David Hitchcock were each, at one time or another, owners and/or operators of the Site responsible for compliance with the 2005 General Approval and SWMA.
76. Defendants failed to comply with all requirements and conditions of the 2005 General Approval since it was issued in October 2005.

WHEREFORE, the Plaintiffs demand judgment against the Defendants:

- a. Ordering Defendants to comply with the conditions of

the 2005 General Approval, including, but not limited to, paragraphs 77 and 81.

b. Imposing civil penalties for each day of violation, as determined by the court, in accordance with N.J.S.A. 13:1E-9; and

c. Granting such other relief as the court deems just and proper.

**COUNT 3**

SWMA VIOLATIONS

77. Plaintiffs incorporate paragraphs 1-76 of this Complaint herein as if fully set forth below;

78. All "residue" (i.e., solid waste generated by the recycling process) shall not be stored at Class B or Class C recycling facilities for more than six months. N.J.A.C. 7:26A-4.1(a)(2).

79. In no event shall unprocessed Class B or Class C recyclable material that is not universal waste be stored at recycling centers approved pursuant to this subchapter for a period in excess of one year from the date of its receipt. N.J.A.C. 7:26A-3.9(b).

80. Defendants Nature's Choice Corporation, Nature's Choice Acquisition Company, Deerfield, Harvest Power, Harvest

Gardens LLC, Reliable Wood Products, Reliable Paper Recycling, Nicolas Vene, Leonard Pirello, and David Hitchcock each, were or are owners and/or operators of the Site and responsible for compliance with the Site's Class B and C recycling regulations.

81. Defendants failed to comply with the SWMA's Class B and C requirements during their operation of the Site.

WHEREFORE, the Plaintiffs demand judgment against the Defendants:

- a. Finding Defendants in violation of the SWMA's Recycling Rules at N.J.A.C. 7:26A-3.1;
- b. Ordering the removal of all solid waste residues and unauthorized materials from the Site;
- c. Ordering the processing and removal, or approved disposal of, all Class B and C materials on Site;
- d. Imposing civil penalties for each day of violation, as determined by the court, in accordance with N.J.S.A. 13:1E-9; and
- e. Awarding Plaintiffs any other relief this Court deems just and appropriate.

**COUNT 4**

WPCA VIOLATIONS

82. Plaintiffs incorporate paragraphs 1-81 of this Complaint herein as if fully set forth below;
83. A NJPDES permit is required for any industrial activity from which stormwater may be discharged to the waters of the State of New Jersey. N.J.A.C. 7:14A-24.2(a)(2).
84. Defendants Nature's Choice Corporation, Nature's Choice Acquisition Company, Deerfield, Harvest Power, Harvest Gardens LLC, Reliable Wood Products, Reliable Paper Recycling, Nicolas Vene, Leonard Pirello, and David Hitchcock were or are owners and/or operators of the Site and responsible for compliance with the Site's Class B and C General Approval and with the WPCA.
85. During each period of ownership or control, the Site was out of compliance with the WPCA, particularly the requirement for the owner/operator to obtain a valid NJPDES permit.

WHEREFORE, the Plaintiffs demand entry of an order against the Defendants:

- a. Ordering Defendants to apply for and obtain a NJPDES permit for stormwater discharges at the Site;
- b. Imposing civil penalties for each day of violation,

as determined by the court, in accordance with  
N.J.S.A. 58:10A-10; and  
c. Awarding Plaintiffs any other relief this Court deems  
just and appropriate.

Respectfully submitted,

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Robert J. Kinney  
Robert Kinney  
Deputy Attorney General

Dated: August 27, 2020



DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, the Court is advised that Robert J. Kinney, Deputy Attorney General, is hereby designated as trial counsel for Plaintiffs in this action.

CERTIFICATION REGARDING OTHER PROCEEDINGS AND PARTIES AND  
COMPLIANCE WITH RULE 1:38-7(c)

Undersigned counsel hereby certifies, in accordance with R. 4:5-1(b)(2), that the matters in controversy in this action are not the subject of any other pending or contemplated action in any court or arbitration proceeding known to Plaintiffs at this time, nor is any non-party known to Plaintiffs at this time who should be joined in this action pursuant to R. 4:28, or who is subject to joinder pursuant to R. 4:29-1. If, however, any such non-party later becomes known to Plaintiffs, an amended certification shall be filed and served on all other parties and with this Court in accordance with R. 4:5-1(b)(2).

Counsel further certifies that confidential personal identifiers have been redacted from documents now submitted to the

court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/  
Robert Kinney  
Deputy Attorney General

Dated: August 27, 2020