



Lunch & Learn Affordable Housing Update A-4, As Amended

February 9, 2024, 12 Noon

A4

**Assembly.
Floor Vote, February 12**

ASSEMBLY, No. 4
STATE OF NEW JERSEY
221st LEGISLATURE

INTRODUCED JANUARY 9, 2024

Sponsored by:
Assemblywoman YVONNE LOPEZ
District 19 (Middlesex)
Assemblyman CRAIG J. COUGHLIN
District 19 (Middlesex)
Assemblyman BENJIE E. WIMBERLY
District 35 (Bergen and Passaic)
Assemblywoman VERLINA REYNOLDS-JACKSON
District 15 (Huntendon and Mercer)

SYNOPSIS
Reforms municipal responsibilities concerning provision of affordable housing; abolishes COAH; appropriates \$16 million.

CURRENT VERSION OF TEXT
As introduced.



Friday, February 9, 2024

S50

**Senate Budget & Appropriations Committee
Next meeting Feb 22, subject to change.**

SENATE, No. 50
STATE OF NEW JERSEY
221st LEGISLATURE

INTRODUCED JANUARY 9, 2024

Sponsored by:
Senator TROY SINGLETON
District 7 (Burlington)
Senator NICHOLAS P. SCUTARI
District 22 (Somerset and Union)

Co-Sponsored by:
Senator Beach

SYNOPSIS
Reforms municipal responsibilities concerning provision of affordable housing; abolishes COAH; appropriates \$16 million.

CURRENT VERSION OF TEXT
As introduced.



(Sponsorship Updated As Of: 1/9/2024)

Descriptions above as of February 8, 2024. Bill may be subject to further amendments

Why is there a bill?

The New Jersey Supreme Court has ruled that each municipality has a constitutional obligation to provide a “realistic opportunity” for the construction of their fair share of affordable housing. The Court also created the “builder’s remedy” suit, which encouraged builders to commence litigation against municipalities to defend the constitutional rights of low- and moderate-income households in return for having their properties rezoned, usually to high density multi-family housing which contain an affordable housing element.

In response to the Supreme Court’s rulings and the high volume of builder’s remedy lawsuits that followed, the legislature adopted the Fair Housing Act (FHA) in 1985. The FHA provided an alternative administrative process for municipalities to participate in, to be overseen by the Council on Affordable Housing (COAH).

Why is there a bill?

One purpose of the council was to review a municipality's affordable housing plan and provide “substantive certification” to those plans that would provide a realistic opportunity for the construction of affordable housing within the municipality. Any municipality that received substantive certification would be shielded from the costly court process of a builder's remedy lawsuit.

The council was also responsible for developing regulations and creating criteria related to each municipality's affordable housing obligation. Using its rulemaking authority the council was meant to determine and assign a municipality's affordable housing obligation. Between 1986 and 1999, the council undertook two successful rounds of rulemaking to establish a formula meant to set each municipality's affordable housing obligation, but ultimately failed to establish rules for the third round, which was intended to begin in 1999, but ultimately began in 2015 following a 16-year gap period.

Why is there a bill?

Today, COAH is effectively defunct through inaction in appointing members as required by the FHA.

Municipalities are currently required to go through the process created by the court and overseen by a court appointed special master to obtain the functional equivalent of Substantive Certification, known as a judgment of repose, and to be protected from builder's remedy and other exclusionary zoning lawsuits.

- Takeaway point: Per the State Supreme Court, this is a constitutional obligation that will remain in place regardless of the outcome of legislation.

Why Now?

- The Fourth Round of affordable housing obligations is set to begin in July 2025.
- The only current means to voluntarily comply is through the Courts.
- Without a functioning apparatus in place before then municipalities will be left to deal with the matter exclusively in the courts and with little guidance available to the courts to direct them on critical aspect of the next round like calculating the statewide and regional need, and how this need should be allocated to individual municipalities.

Major Provisions of A4/S50

- COAH abolished. Its duties and functions would effectively be split between the Department of Community Affairs (DCA) and the Administrative Office of Courts (AOC.)
- DCA runs the numbers using the methodology within the bill and the newly established Affordable Housing Dispute Resolution Program (Program) within the AOC handles any dispute.
- The methodology used by the DCA to calculate regional need and municipal present and prospective obligations is outlined within A4/S50 and where not clear in the legislative language the DCA is to use the methodologies and datasets within the March 8, 2018 unpublished decision from the Superior Court; In re Application of Municipality of Princeton, also known as the “Jacobson opinion.”
- Each municipality sets its own obligation number and must adopt the number through a binding resolution.
- The availability of bonus credits has been expanded compared to the bills introduced last legislative session but remain capped. The rental bonus credit would be eliminated.

A4, As Amended on February 8

- Several significant amendments, which we will review. Many of these amendments are in response to concerns raised by the League of Municipalities, the Conference of Mayors and local officials statewide.
- As noted above, A4 is scheduled for a floor vote on Monday, February 12.
- S50 was favorably reported out of the Senate Community and Urban Affairs Committee on January 25 and referred to the Senate Budget and Appropriations Committee (SBA.) The bill is subject to further amendments if, and when, it progresses in the Senate.
- SBA next scheduled to meet on February 22.
- Full Senate scheduled for voting session on March 21.
- Dates subject to change.

Assembly Appropriations Amendments to A4, February 8, 2024

New Language, Section 1, paragraph p

“The Legislature declares the “Fair Housing Act,” P.L.1985, c.222 (C.52:27D-301 et al.), as amended and supplemented by P.L.____, c.____ (C.____) (pending before the Legislature as this bill), is intended to implement the Mount Laurel doctrine, and that municipalities in compliance with the “Fair Housing Act,” P.L.1985, c.222 (C.52:27D-301 et al.) are also in compliance with the Mount Laurel doctrine.”

- This language intends to limit the challenges that municipalities could face. In essence, if a municipality is in compliance with the Fair Housing Act they are in compliance with the Mount Laurel Doctrine, thus limiting an avenue for challenges.

Assembly Appropriations Amendments to A4, February 8, 2024

New Language, Section 1, paragraph q

States the Legislature's intent to allow up to 30% of municipal prospective obligation to be addressed through age-restricted housing. Under the bill as introduced this figure was 25%.

Assembly Appropriations Amendments to A4, February 8, 2024

New Language, Section 2

New defined term for “exclusionary zoning litigation”

“Litigation to challenge the fair share plan, housing element, or ordinances or resolutions implementing the fair share plan or housing element of the municipality based on alleged noncompliance with the [FHA] or the Mount Laurel Doctrine, which litigation shall include, but shall not be limited to, litigation seeking a builder’s remedy.”

- The amendments would also replace instances throughout the bill where the term “builder’s remedy” is used with the term “exclusionary zoning litigation.”
- Intent is to expand the protections offered within the bill to make these protections similar to what is has historically been available to municipalities through substantive certification with COAH and currently available through a judgment of repose obtain using the current court process.
- The amendments also include a new provision clarifying that immunity from exclusionary zoning litigation shall not limit the ability of an interested party to challenge a municipality for failure to comply with the terms of its compliance certification. However, a municipality’s action to comply shall retain **a presumption of validity.**

Assembly Appropriations Amendments to A4, February 8, 2024

New Language, Section 3 f (2)(b)

New language requires the program in its review to:

“apply an objective standard to conduct a limited review of the fair share plan and housing element for consistency and to determine whether it enables the municipality to satisfy the fair share obligation, applies compliant mechanisms, meets the threshold requirements for rental and family units, does not exceed limits on other unit or category types, and is compliant with the [FHA]. The program shall issue a compliance certification unless these objective standards are not met.”

- These amendments attempt to set clear criteria that the program must use to evaluate municipal elements and plans and requires the issuance of certification if these criteria are satisfied.

Assembly Appropriations Amendments to A4, February 8, 2024

New Language, Section 3 f(3)(g)

“The program shall be made a party to, and shall be responsible for defending its issuance of compliance certification in, any litigation alleging that, despite the issuance of compliance certification, a municipality’s fair share obligation, fair share plan, housing element, or ordinances implementing the fair share plan or housing element are not in compliance with the Mount Laurel doctrine.”

- The intent of this amendment is to make the program a party to any challenge to a municipality’s compliance certification and to have the program defend the issuance of the certification. This would be similar to how COAH was a party to dispute regarding substantive certification.

Assembly Appropriations Amendments to A4, February 8, 2024

New Language, Section 3

“The implementing ordinances and resolutions adopted prior to the resolution of the dispute may be subject to changes to reflect the results of the dispute. As an alternative to adopting the implementing ordinances and resolutions by the March 15 deadline, a municipality involved in a continuing dispute over the issuance of compliance certification may adopt a binding resolution by this date to commit to adopting the implementing ordinances and resolutions following resolution of the dispute, with necessary adjustments to reflect the resolution of the dispute.”

- This amendment is intended to prevent a situation where a municipality involved in a dispute would need to adopt ordinances and resolutions to implement something that remains unknown.

Assembly Appropriations Amendments to A4, February 8, 2024

Language Change, Section 7

A4, as introduced, the Land Capacity Factor used to determine a municipality's prospective need included an estimation of developable land and redevelopable land.

Without a clear definition of redevelopable land, theoretically anything could be deemed is redevelopable, suggesting that large additional tracks of land within the municipality might need to be considered when determining the land capacity factor.

Committee amendments remove the term “redevelopable” from the bill.

Assembly Appropriations Amendments to A4, February 8, 2024

Changes to Bonus Credits

100% Affordable with Municipal Contribution: One unit of credit and **one* bonus credit** for each unit of low- or moderate-income housing in a 100% affordable housing project, which the municipality contributes toward the cost of the project.

Contributions can be (a) real property donations or, (b) contributions from the municipal affordable housing trust fund if the contribution consists of no less than 3%* of the project cost

- A4 as introduced provided for one-half bonus credit.
- A4 as introduced provided that a municipality must contribute at least 10% of the project cost to be eligible for the bonus credit.

Assembly Appropriations Amendments to A4, February 8, 2024

New Bonus Credit Added

A4 as introduced included 9 types of bonus credits. Committee amendments added a tenth bonus credit related to the conversion of market rate units to affordable.

One unit of credit and one bonus credit for each unit of low- or moderate-income housing created by transforming an existing rental or ownership unit from a market rate unit to an affordable housing unit.

This bonus credit can only be relied on if the municipality demonstrates that a commitment to follow through with this market to affordable agreement has been made and (a) an agreement has been signed by the property owner; or (b) the municipality has obtained ownership of the property.

Methodology

- Methodology based chiefly on the data sets and calculations found with In re Application of Municipality of Princeton, also known as the “Jacobson opinion.”
- Legislation makes specific changes with present need calculation as well as prospective need, in addition to the Jacobson opinion.

A4, The Process in a Nutshell

1. DCA produces a report determining the regional need and municipal obligations for each region of the state. This is to happen the earlier of 7 months from the bill's adoption or December 1, 2024. (*Section 3 d.*)
2. Considering these calculations a municipality shall determine its present and prospective fair share obligation. This obligation shall be adopted through binding resolution no later than January 31, 2025. If a municipality does not meet this deadline, it loses immunity from builder's remedy litigation. (*Section 3 f. (1)(b)*)

A4, The Process in a Nutshell, continued

3. Interested parties have until February 28, 2025, to challenge the municipality's adopted obligation number through the Program. If no challenge by this time, then on March 1, 2025, the municipality's determination is established by default and under the amendments is given a presumption of validity. (*Section 3 f. (1)(b)*)
4. Challenges to the municipal obligation determination are brought within the Program. Any challenge must state with particularity how the municipal calculation fails to comply with the methodology laid out within the legislation and must include the challenger's own calculation of fair share obligations. (*Section 3 f. (1)(c)*)

A4, The Process in a Nutshell

5. Upon a challenge the Program can:

- a. Make a finding that the municipality's determination of its present and prospective need obligation did not facially comply with the law and the immunity is revoked,
- b. Make an adjustment to the municipality's determination to comply with the law without revoking immunity, or
- c. Reject the challenge and affirm the municipality's determination.
 - A determination from the Program must be made no later than March 31 of the year when the current round is expiring. That is, March 31, 2025, for the upcoming Fourth Round. (*Section 3 f. (1)(c)*)

A4 The Process in a Nutshell

6. A municipality must adopt a Housing Element and Fair Share Plan, along with drafts of the appropriate zoning and other ordinances and resolutions implementing its present and prospective obligation by June 30, 2025. These must be filed with the Program within 48 hours of adoption. Failure to meet these deadlines, including filing with the Program, will result in the loss of immunity from builder's remedy litigation. (*Section 3 f. (2)(a)*)

New from Amendments: The timeline for adopting implementing ordinances and resolutions may change based on any challenges brought.

7. An interested party has until August 31, 2025, to file an action within the Program challenging the municipality's Fair Share Plan and Housing Element. If no challenge before August 31, then the Program review the Plan and Element for consistency with the FHA. (*Section 3 f. (2)(b)*)

A4, The Process in a Nutshell

8. A municipality has until December 31, 2025, to settle any challenge or provide an explanation as to why it will not make all, or some of the requested changes, or both. (*Section 3 f. (2)(b))*)
9. A municipality has until March 15, 2026, to amend their Housing Element and Fair Share Plan and to adopt the implementing ordinances to comport with the amended numbers. Upon adoption of any changes the municipality must immediately file them with the Program using the Programs website. (*Section 3 f. (2)(c))*)
10. A municipality or other interested party may file an action through the program seeking a realistic opportunity review at the midpoint of the certification period. (*Section 4, Pages 16-17*)

A4, The Program

(See Section 5)

- The purpose of the Affordable Housing Dispute Resolution Program (Program) is to “efficiently resolve disputes involving the “Fair Share Housing Act.”
- The Program is made up of an odd number of members, of at least three and no more than seven.
- Members of the Program are to be appointed by the Administrative Director of the Courts within 60 days* of the legislation’s adoption. Members must be current or former “Mount Laurel Judges” or other qualified experts, if there are not enough judges.

A4, The Program

- When making appointments the Administrative Director of the Courts must take into consideration the experience in the employment of alternative dispute resolution methods and relevant subject.
- The legislation from last session included a provision that limited the political make up of the Program members. No such provision is in the newly introduced bill

A4, County Level Housing Judges

- The Director is required to designate a Superior Court judge who sits within the vicinage, or a retired judge, who during the judge's tenure served within the vicinage, to serve as a county level housing judge to resolve disputes over compliance of fair share affordable housing obligations and municipal fair share plans and housing elements of municipalities within their county, with the Fair Housing Act.
- A judge shall be permitted to serve as a county level housing judge for more than one county in the same vicinage.

A4, Amended, Bonus Credits

See Section 24, page 49.

- A municipality shall not receive more than one type of bonus credit for any unit. This is current practice.
- A municipality shall not be permitted to satisfy more than 25% of its prospective need obligations through the use of bonus credits.
(A4, page 48)
- The availability of bonus credits has been expanded compared to the bills introduced last legislative session but remain capped.
- The rental bonus credit would be eliminated.

A4, Amended, Bonus Credits

1. Special Needs: One unit of credit and **one bonus credit** for each unit of low- or moderate-income housing for individuals with special needs or permanent supportive housing.
2. Non-Profit Partnership: One unit of credit and **one-half bonus credit** for each unit of low- or moderate-income housing unit created in partnership with a non-profit housing developer.
3. Proximity to Transit: One unit of credit and **one-half bonus credit** for each unit of low- or moderate-income housing located within a one-half mile radius (one-mile radius if located in a Garden State Growth Zone) surrounding a NJ Transit Port Authority Transit Corp., Port Authority Trans-Hudson Corp., rail, bus, or ferry station, including all light rail stations.
4. Age-Restricted: One unit of credit and **one-half bonus credit** for a unit of age-restricted housing. (Bonus credit only applicable to 10% of all age-restricted housing built that count towards affordable housing obligation.)
5. Family Housing: One unit of credit and **one-half bonus credit** for each unit of low- or moderate-income family housing with at least three bedrooms above the minimum number required by the bedroom distribution.

A4, Amended, Bonus Credits

6. Redevelopment: One unit of credit and **one-half bonus credit** for each unit of low- or moderate-income housing constructed on land that is or was previously developed and utilized for retail, office, or commercial space.
7. Extension of Affordability Controls: One unit of credit and **one-half bonus credit** for each existing low- or moderate-income **RENTAL** housing unit for which affordability controls are extended for a new term, and the municipality contributes funding towards the costs necessary for this preservation.
8. 100% Affordable with Municipal Contribution: One unit of credit and **one* bonus credit** for each unit of low- or moderate-income housing in a 100% affordable housing project, which the municipality contributes toward the cost of the project.
Contributions can be (a) real property donations or, (b) contributions from the municipal affordable housing trust fund if the contribution consists of no less than 3%* of the project cost.
9. Very Low Income: One unit of credit and **one-half bonus credit** for each unit of very low-income housing for families above the 13% of units required to be preserved for very low-income housing

A4, Amended, Bonus Credits

NEW

10. One unit of credit and one bonus credit for each unit of low- or moderate-income housing created by transforming an existing rental or ownership unit from a market rate unit to an affordable housing unit. This bonus credit can only be relied on if the municipality demonstrates that a commitment to follow through with this market to affordable agreement has been made and (a) an agreement has been signed by the property owner; or (b) the municipality has obtained ownership of the property.

A4, Housing Element and Fair Share Plan

Housing Element & Fair Share Plan

- Must include a spending plan for current funds in the municipal affordable housing trust fund and projected funds towards the round.
- As part of the Housing Element and Fair Share Plan the municipality shall include an assessment of the degree to which the municipality has met its fair share obligation from the prior rounds of affordable housing obligations as established by prior approval and determine to what extent this obligation is unfulfilled or whether the municipality has credits in excess of prior round obligations.
- The legislation expands upon the techniques required to be considered in a housing element. Under current law the housing element must consider “A plan for infrastructure expansion and rehabilitation if necessary...” The legislation expands this to require a plan for “conversion or redevelopment of unused or underutilized property, including existing structures” (*Section 24*)

A4, Vacant Land Adjustment and Need to Identify Parcels Likely to Redevelop

Section 23, page 44.

- The legislation would require any municipality that receives a an adjustment of its prospective need obligation for the fourth or any subsequent rounds based on a lack of vacant land to, as part of its adopting and implementing its Housing Element and Fair Share Plan, “identify sufficient parcels likely to redevelop during the current round of obligations to address at least 25% of the prospective need obligation that has been adjusted, and adopt realistic zoning that allows for such adjusted obligation, or demonstrate why the municipality is unable to do so.”
- The Program, as part of providing Compliance Certification, must confirm that land was correctly excluded.

A4, Limits, Minimums, & Maximums:

Age Restricted Housing: A municipality may not satisfy more than 30%* of the affordable housing units, exclusive of bonus credits, to address its prospective need obligation through the creation of age-restricted housing.

Housing Available to Families with Children: A municipality must satisfy at least 50% of the actual affordable housing units, exclusive of bonus credits, created to address its prospective need obligation through the creation of housing available to families with children. This is a continuation of current requirements.

Rental Housing: A municipality must satisfy at least 25% of the actual affordable housing units, exclusive of bonus credits, to address its prospective need obligation through rental units. At least half of that number must be available for families with children. This is a continuation of current requirements.

A4, Limits, Minimums, & Maximums:

Very Low Income: (page 59) 13% of the housing units made available for low- and moderate income households must be reserved for occupancy by very low-income households. (This is not new.) What is new is that at least half of that number must be made available to families with children.

Transitional Housing: (*Section 24, page 47*) A municipality shall not credit transitional housing credits to more than 10% of the municipality's fair share obligation.

1,000 Unit Maximum: (*Section 3, page 12*) A municipality may lower its prospective need obligation to the extent necessary to prevent establishing a prospective need obligations of more than 1,000 housing units, after application of credits, or to prevent a prospective need obligation that exceeds 20% of the total number of households in a municipality. If subject to both, the reduction resulting in the lower obligation number is to be applied.

A4, Affordability Controls:

Section 27, amending Section 21 of P.L.1985, c.222 (C.52:27D-321 (f)) Page 56.

- Under current law the HMFA may provide grants and loans to affordable housing programs provided the housing created through the assistance is restricted as low- and moderate income housing for a period of 20 years. This 20-year period was required for both rentals and for-sale units.
- The legislation increases the minimum period requiring affordability controls to 30 years for newly created rental units and maintains a 20 year period for for-sale units, except for housing units which affordability controls are extended for a new term of affordability.
- For units that have affordability controls extended for a new term a 20-year deed restriction shall be required if the unit was initially created before October 1, 2001; and a 30-year minimum deed restriction shall be required if the unit was initially created after October 1, 2001.
- Current law also provides for the opportunity to lower the 20-year required affordability controls if it is determined that the economic feasibility of the program is jeopardized by the requirement and that the public purpose served by the program outweighs the shorter period.
- The legislation eliminates the opportunity to reduce the minimum requirement for affordability controls.

A4, Affordability Controls:

Section 27, amending Section 21 of P.L.1985, c.222 (C.52:27D-321 (f)) Page 56.

Municipal Housing Liaisons (Page 57)

- The DCA is tasked with promulgating processes and standards for the certification of administrative agents and municipal housing liaisons.

A4, Development Fees



- **New:** Within 180* days following enactment, any municipality that is or has been authorized to impose and collect development fees from developers of residential property or payments in lieu of constructing affordable housing, shall provide the DCA with a detailed accounting of such fees that have been collected and expended since the inception of the municipal authorization of such fees. (*originally was 90 days)
- A detailed accounting is then due by January 15 each year.
- Must include within Housing Element a spending plan for current funds in the municipal affordable housing trust fund and projected funds towards the round.
- DCA is to establish new rules related to the funds including rules that establish an expedited process for approving a spending plan for emergent opportunities to create affordable housing.
- A municipality, which would seemingly include qualified urban aid municipalities, is prohibited from expending any development trust funds unless they have immunity from builder's remedy litigation at the time of the expenditure. This limitation changes prior practice which allowed expenditures if the municipality was in the process of obtaining certification.

A4, Development Fees:

Limitation on Use of Funds:

Development fees cannot be used to pay for: (i) administrative costs, attorney fees or court costs to obtain a judgement of repose (ii) to contest a determination of the municipality's fair share obligation, (iii) on costs of any challenger in connection to a challenge to the municipality's obligations, housing element, or fair share plan.

There remains a 20% cap on the use of funds for administrative purposes but what constitutes administrative purposes has been specified and limited to: (i) actions and efforts reasonably related to the determination of a municipal obligation and development of its housing element and fair share plan, and (ii) expenses that are reasonably necessary for compliance with the process of the program, including but not limited to, the costs to the municipality of resolving a challenge under the program.

Note – Development fees cannot be used to pay for the administrative costs associated with a judgement of repose, but they can be used (capped at 20%) for the administrative costs within the Program. Unclear on how development fees can be used if Program determination is appealed.

A4, Timeline

Within 7 months of the bill's adoption or December 1, 2024, whichever is sooner: Deadline for the DCA to complete and publish a report on the calculation of regional need and municipal obligations for each region. A new report is due August 1 of the year prior to the start of each 10-year round.

January 31, 2025: Deadline for a municipality to adopt their numbers via “Binding Resolution” with or without using the DCA’s numbers.

February 28, 2025: Deadline to challenge a municipality’s adopted numbers.

March 1, 2025: If no challenges, the Town’s numbers are established by default, immunity remains in effect.

April 1, 2025: Deadline for the Affordable Housing Dispute Resolution Program (AHDRP) to settle the number challenge(s).

A4, Timeline, continued

June 30, 2025: Deadline to adopt and endorse a Housing Element and Fair Share Plan and file with the Program to maintain immunity.

August 31, 2025: Deadline to challenge the validity of a municipality's Housing Element and Fair Share Plan.

December 31, 2025: Deadline for the municipality to settle the challenge or provide an explanation as to why it will not make all, or some of the requested changes, or both.

March 15, 2026: Deadline for a municipality to amend their Housing Element and Fair Share Plans and to adopt the implementing ordinances to comport with the amended numbers.

Next Steps, Assembly

- On Assembly Board list for Monday, February 12 Voting Session.
- If approved, it will then be received in the Senate and referenced to the Senate Budget and Appropriations Committee, where its counterpart S50 is currently referenced.

Next Steps, Senate

- S50 was favorably reported out of the Senate Community and Urban Affairs Committee on January 25 and referred to the Senate Budget and Appropriations Committee (SBA.) The bill is subject to further amendments if, and when, it progresses in the Senate.
- SBA next scheduled to meet on February 22.
- Full Senate scheduled for voting session on March 21.
- Dates subject to change.

Next Steps, Senate

Senate Budget and Appropriations Committee

Members:

Sarlo, Paul A., Chair

Greenstein, Linda R., Vice-Chair

Amato, Carmen F.

Burgess, Renee C.

Burzichelli, John J.

Cruz-Perez, Nilsa I.

Diegnan, Patrick J.

Johnson, Gordon M.

O'Scanlon, Declan J.

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Concerns and Questions?



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