FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4196

DATE FILMED 11-22-95 CAMERA NO. _____

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Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718
908 495-2531

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

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To: OFFICE OF GENERAL COUNSEL.

FEDERAL ELECTION COMMISSION
WASHINGTON. D.C. 20463

Date MARCH 20, 1995

NOTARIZED COPY.

I EDWARD RENAUD, AS COMPLAINANT MAKE THE FOLLOWING ALLEGATIONS AND STATEMENTS RELATING TO ACTIONS WHERE I BELIEVE THAT VIOLATIONS OF FEDERAL ELECTION LAWS OR COMMISSION REGULATIONS HAVE TAKEN PLACE.

1. THAT TWO ATTORNEYS HAVE BEEN DIRECTLY INVOLVED, SHARON LYNCH NORTON AND THOMAS W. CAVANAGH OF THE LAW FIRM CHAMLIN, ROSEN, CAVANAGH & ULIANO OF 268 NORWOOD AVENUE P.O. BOX 38. WEST LONG BRANCH, N.J. 07764. MRS. NORTON IS ALSO THE LONG BRANCH CITY ATTORNEY AND I BELIEVE THAT SHE OWES HER EMPLOYMENT IN THAT POLITICAL PATRONAGE POSITION TO CONGRESSMAN FRANK PALLONE (SIXTH DISTRICT) WHO RESIDES IN LONG BRANCH. MR. CAVANAGH DIVIDES HIS PRACTICE BETWEEN EDUCATION LAW PRACTICING PRINCIPALLY FOR THE NEW JERSEY EDUCATION ASSOCIATION, AND REAL ESTATE LAW.

2. THAT THE TWO ABOVE MRS. NORTON AND MR. CAVANAGH ACTED FROM FEBRUARY OF 1993 THRU APRIL OF 1994 TO PARTICIPATE IN AND CONCEAL A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS UNDER STATE LAWS OF N.J. AS A TENURED TEACHER, AS A HANDICAPPED PERSON UNDER THE N.J. LAW AGAINST DISCRIMINATION; UNDER FEDERAL LAW, THE AMERICAN'S WITH DISABILITIES ACT, MY RIGHT TO PRIVACY AND MY CONSTITUTIONAL RIGHT TO DUE PROCESS.

3. THAT THE INTEREST OF THE ATTORNEYS CAVANAGH AND NORTON WAS TO BENEFIT CONGRESSMAN PALLONE'S CANDIDACY AS A DEMOCRATIC INCUMBENT IN THE 1994 PRIMARY AND NOVEMBER

8TH 1994 ELECTION. IN RETURN FOR CONCEALING AND PARTICIPATING IN A CRIMINAL CONSPIRACY MIDDLESEX COUNTY GRANTED CONGRESSMAN PALLONE THE ADVANTAGE POLITICALLY AND FINANCIALLY THAT HE WOULD FACE NO CANDIDATE FROM MIDDLESEX COUNTY IN THE MAY 1994 PRIMARY. I BELIEVE THAT THE ATTORNEYS NORTON AND CAVANAGH WERE PARTICIPANTS IN MAKING THIS COMPACT, CONCEALING A CONSPIRACY ORIGINATING IN MIDDLESEX COUNTY FOR THE BENEFIT OF MONMOUTH COUNTY.

4. THAT THE CONSPIRACY THAT THESE ATTORNEYS PARTICIPATED IN AND CONCEALED IS STATED IN THE ACCOMPANYING MATERIALS I HAVE SENT IN SUPPORT OF THIS COMPLAINT ALL OF WHICH REFER TO ACTIONS THAT BEGAN IN 1984. AT THAT TIME I WAS A UNKNOWING VICTIM OF A CONSPIRACY BY TWO ORIGINATING PARTIES. MY EMPLOYER SINCE 1974, THE EDISON TOWNSHIP BOARD OF EDUCATION AND THE TEACHERS UNION, THE EDISON TOWNSHIP EDUCATION ASSOCIATION. 1984 IS THE YEAR THE EDISON BOARD OF ED. BECAME A MEMBER OF A INSURANCE RISK GROUP AND DIRECTLY RESPONSIBLE FOR PAYMENT OF THE MEDICAL CARE COSTS OF IT'S EMPLOYEES. HAVING HAD CANCER IN 1979 I BECAME A TARGET AS A INDIVIDUAL WHO HAD ELEVATED AND POTENTIAL HEALTH CARE COSTS TO THE BOARD OF EDUCATION'S RISK GROUP. SINCE THAT TIME THE BOARD OF EDUCATION HAS ENGAGED IN A NUMBER OF PUNITIVE ACTS, FRAUDULENTLY STATED MY SENIORITY AND MISREPRESENTED THE TERMS OF MY EMPLOYMENT ALL WITH THE SPECIFIC GOAL OF ENDING MY EMPLOYMENT IN CIRCUMSTANCES THAT WOULD ASSURE THAT I WOULD NOT BE ABLE TO RETURN TO EMPLOYMENT, CONTINUE TO ELECT TO PAY FOR MY HEALTH BENEFITS PLAN, OR COLLECT A DISABILITY PENSION. ALL OF THESE ACTIONS WERE DONE WITH THE COMPLETE COOPERATION OF THE TEACHERS ASSOCIATION, AND SINCE 1992 WITH THE PARTICIPATION OF ATTORNEYS PAID BY THE STATE UNION, THE N.J.E.A.

THE INTEREST OF THE ATTORNEYS MRS. NORTON AND



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MR. CAVANAGH WERE TO CONCEAL THE ACTUAL CAUSE OF THE THE BOARD OF EDUCATION'S ADVERSE ACTION, PROTECT THE ORIGINAL CONSPIRING PARTIES ACTING SINCE 1984, THE ADDITIONAL PARTIES BROUGHT IN TO THE CONSPIRACY AFTER AUGUST OF 1992 AND PARTICIPATE IN THAT CONSPIRACY FOR POLITICAL AND FINANCIAL PROFIT.

THE DOCUMENTATION I HAVE PROVIDED IS NOT ALL OF THE MATERIAL ON EVERY PARTICIPANT IN THE CONSPIRACY OR DOES IT CURRENTLY DESCRIBE EVERY INCIDENT OF HARRASSMENT, RETALIATION OR COERCION. IT DOES THOROUGHLY SUPPORT THE ALLEGATION OF REPEATED ACTS BY PARTIES ACTING AT THE SAME TIME WITH THE SAME ILLEGAL INTENT. THE ATTORNEYS INVOLVED HAVE BEEN PAID BY THE N.J.E.A. WHICH IS THE STATES LARGEST AND POLITICALLY POWERFULL UNION TO MALICIOUSLY MISUSE THE LEGAL PROCESS AS A MEANS OF SUBJECTING ME TO DURESS, DAMAGING ME FINANCIALLY AND COERCING ME INTO SILENCE REGARDING THE ACTIONS OF THE CONSPIRING PARTIES. THE ATTORNEYS IGNORED VIOLATIONS OF MY CONSTITUTIONAL RIGHTS TO DUE PROCESS, VIOLATIONS OF INSURANCE LAWS, THE DOCUMENTS THAT I PRESENTED TO THEM REGARDING THE CONSPIRACY THAT BEGAN IN 1984, THE PARTICIPATION OF THE E.T.E.A. AND PURSUED THE COURSE OF ACTION THAT THE BOARD OF EDUCATION HAD CHOSEN AS A MEANS OF ABROGATING THEIR CRIMINAL CONSPIRACY. THEY COMBINED MY DISABILITIES AND THE LEGAL PROCESS CONTROLLED BY UNION PAID ATTORNEYS AS A MEANS OF ASSURING THAT MY RIGHTS WOULD BE VIOLATED, NOT PROTECTED, THAT THE PARTIES INVOLVED WOULD NOT BE SUBJECTED TO PENALTIES UNDER CIVIL OR CRIMINAL LAW AND WHEN IT WAS TO THEIR BENEFIT THEY USED THEIR ABILITY TO OBTAIN THE ASSISTANCE OF STATE AND FEDERAL AGENCIES THRU POLITICAL CORRUPTION.

5. THAT I CANNOT PROVIDE A SINGLE DOCUMENT THAT CONCLUSIVELY DOCUMENTS OR CONNECTS THE CONSPIRING PARTIES, THE



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CIRCUMSTANTIAL EVIDENCE FOR ME CAN LEAD TO NO OTHER CONCLUSION THAN THE ONE STATED IN THE ALLEGATIONS SUBMITTED HERE. THAT THE ATTORNEYS MRS. NORTON AND MR. CAVANAGH ACTED FOR FINANCIAL AND POLITICAL PROFIT. THE COURSE OF ACTION CHOSEN BY THESE ATTORNEYS IS SUCH THAT I BELIEVE THAT THEY HAVE JEOPARDIZED THEIR STANDING BEFORE THE BAR BY THEIR ACTIONS. THE RESEARCH I HAVE DONE IN THE AREA OF ATTORNEY ETHICS AND THE REACTIONS OF OTHER ATTORNEYS WHEN I MENTION EXTENSIVE CRIMINAL ACTIVITY, CONSTITUTIONAL VIOLATIONS AND THE CONNECTIONS OF THE CONSPIRING PARTIES ALL HAVE SUPPORTED MY BELIEF THAT THE ACTIONS OF THE ATTORNEYS WERE PREDICATED ON A MOTIVE OTHER THAN PROTECTING MY RIGHTS.

I BELIEVE THAT THE BEST DOCUMENTATION I CAN SUBMIT IS THE FOLLOWING:

- PAGES A-75, 76, 77, 78 THIS LETTER DIRECTLY ADDRESSES THE SITUATION AS I UNDERSTOOD IT AT THE TIME. I HAD GONE TO CONGRESSMAN PALLONE'S HAZLET OFFICE AN AUGUST OF 1992 TO ADDRESS THE ISSUE AS THE CONSPIRING PARTIES INTENDED, AS THE BASIS FOR A A.D.A. COMPLAINT. THERE I MET MRS. GENIVIEVE HAWLEY, CONGRESSMAN PALLONE'S DISTRICT OFFICE MANAGER. AT THAT TIME I UNDERSTOOD THAT MY RIGHTS WERE BEING VIOLATED, THAT THE ATTORNEY STEPHEN KLAUSNER WHO WAS ASSIGNED TO PROTECT MY RIGHTS HAD REFUSED TO TAKE <u>ANY</u> ACTION ON MY BEHALF AND ON MY INVESTIGATION I HAD FOUND THAT HE HAD ABANDONED EVERY PERSON THAT THE E.T.E.A. HAD ASSIGNED TO HIM. TO MY KNOWLEDGE THE N.J.E.A. HAS NEVER LITIGATED IN ANY CIVIL RIGHTS DISPUTE ON BEHALF OF A INDIVIDUAL TEACHER. MRS. HAWLEY PROVIDED ASSISTANCE IN SMALL WAYS UNTIL THE TIME I WROTE THE LETTER OF JANUARY 26, 1993 AT HER SUGGESTION. FOLLOWING MY WRITING THAT LETTER MRS. HAWLEY REFUSED TO PROVIDE ANY FURTHER ASSISTANCE. I BELIEVE THAT AT THAT TIME MRS. HAWLEY CAME TO KNOW THE ACTUAL FACTS AND CAUSE OF THE

BOARD OF EDUCATION'S ADVERSE ACTIONS IN VIOLATING MY DUE PROCESS RIGHTS AS A TENURED TEACHER, THAT THE BOARD OF EDUCATION HAD CONSPIRED WITH THE E.T.E.A. SINCE 1984 TO END MY EMPLOYMENT BECAUSE I WAS HANDICAPPED, AND THAT THE N.J.E.A. WAS PAYING ATTORNEYS TO CONCEAL ALL OF THE ACTIONS OF THE CONSPIRING PARTIES. AS THE RESPONSE (A-79) INDICATES, THERE WAS NO RESPONSE. TO ANY OF THE QUESTIONS I HAD ASKED THE BOARD OF EDUCATION, REGARDING CONSTITUTIONAL VIOLATIONS, HARRASSMENT, A FRAUDULENT WITHDRAWAL FROM MY ANNUITY OR THE PARTICIPATION OF THEIR CHIEF MEDICAL INSPECTOR.

PRIOR TO WRITING THIS LETTER I HAD EXPRESSED MY DISSATISFACTION WITH THE ATTORNEY STEPHEN KLAUSNER CLEARLY STATING THAT I HOPED TO FIND A ATTORNEY WHO WAS NOT CONNECTED WITH THE N.J.E.A., ONE CLOSER TO MY HOME TO FACILITATE MEETINGS (I HAD NONE WITH MR KLAUSNER) AND THE ATTORNEY WOULD HAVE TO ACTUALLY PRODUCE SOME COMPLAINTS, FILE ACTIONS IN ANY REASONED JURISDICTION AND RESPOND TO THE ACTIONS TAKEN BY THE SCHOOL BOARD.

I BELIEVE THAT AS A RESULT OF MY WRITING THE LETTER OF JANUARY 26, 1933 TO THE PRESIDENT OF THE EDISON SCHOOL BOARD THAT THE CONSPIRING PARTIES, THE SCHOOL BOARD, E.T.E.A. AND MRS. HANLEY PRODUCED THE REFERRAL TO THE ATTORNEYS NORTON AND CAVANAGH. THE REFERRAL DID NOT COME DIRECTLY FROM THEM, IT CAME FROM THE TEACHER RALPH VENTOLA WHO WAS RAISED TO THE SENIORITY POSITION ABOVE MINE BY THE E.T.E.A. AND BOARD OF EDUCATION IN THEIR ACTIONS IN 1984 TO DISCRIMINATE AGAINST ME AS A PERSON WHO MIGHT INCUR COSTS TO THE BOARD'S INSURANCE RISK POOL. HE MADE THE REFERRAL ON THE CLAIM THAT HE HAD USED ATTORNEYS IN THE SAME LAW FIRM FOR A SMALL AUTOMOBILE LIABILITY CLAIM. I NOW RECOGNIZE TWO THINGS THAT INDICATE THAT HE HAD LIED REGARDING THIS REFERRAL; NO ONE

WOULD REASONABLY PAY A ATTORNEY AT THEIR OWN COST FOR REPRESENTATION IN A AUTO LIABILITY MATTER, THE INSURANCE CARRIER FOR YOUR INSURANCE PROVIDES LEGAL REPRESENTATION: AND IT WAS SOON AFTER THIS REFERRAL THAT I INVESTIGATED THE LAW REGARDING THE FRAUDULENT CLAIM THAT MR. VENTOLA WAS TO BE PLACED IN THE SENIORITY POSITION ABOVE MINE IN 1984 AND FOUND THAT THE LAW USED TO JUSTIFY THIS ACTION WAS NOT RETROACTIVE AND ONLY APPLIED TO INDIVIDUALS HIRED AFTER JUNE 28, 1985 (N.J. SA. 18A:28-12) MR VENTOLA'S DATE OF HIRE WAS SEPTEMBER 1 OF 1974, 6 MONTHS AFTER MINE. HE HAD BEEN A KNOWING PARTICIPANT IN CONSPIRACY SINCE 1984, ADDITIONAL STATEMENTS MADE TO ME BY MR. VENTOLA INDICATED THAT HE HAD TAKEN A REDUCTION IN PAY TO "BUY" MY SENIORITY POSITION, AND WOULD HAVE A SUBSTANTIAL INTEREST IN ASSURING THAT I WOULD BE REFERRED TO ATTORNEYS WHO WOULD PROTECT HIS INTEREST IN THE CONSPIRACY.

6. AS A DOCUMENT SUPPORTING THE ALLEGATION THAT CONGRESSMAN PALLONE HAD BENEFITED FROM THE ACTIONS OF THE ATTORNEYS NORTON AND CAVANAGH I AM ALSO SUBMITING A LETTER OF DEC. 18, 1994 TO THE HONORABLE FRANK PALLONE JR. THERE HAS NEVER BEEN ANY REPLY TO THIS LETTER, IT REFERENCES. ONLY THE ACTIONS OF MR CAVANAGH IN KEEPING WITH THE LETTER OF MARCH 5, 1993 REFERING REP. PALLONE TO MR. CAVANAGH, ALTHOUGH TO MY KNOWLEDGE THERE HAS NEVER BEEN ANY INQUIRY OR REPLY THAT I HAVE KNOWN ABOUT. (LETTER ATTACHED AS PAGE )

7. I HAVE BASED MY INVESTIGATION ON MINIMAL ADVICE THAT I HAVE BEEN FROM ATTORNEYS THAT I HAVE CONSULTED PRIVATELY MY OWN RESEARCH AND DOCUMENTS THAT I HAD OR OBTAINED SIMPLY BY ASKING. IT BECAME A SERIES OF EXPERIENCES WHERE I BASED MY INVESTIGATION ON ISSUES THAT THE



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ATTORNEYS INVOLVED, CONSPIRING PARTIES AND STATE AGENCIES WOULD NOT DISCUSS. THE ATTORNEYS NORTON AND CAVANAGH WOULD NOT DISCUSS THE ACTIONS OF THE ATTORNEY STEPHEN KLAUSNER, THEY WOULD NOT DISCUSS THE INVOLVEMENT OF THE E.T.E.A., THEY WOULD NOT ADDRESS DOCUMENTATION THAT I OFFERED ON SENIORITY, STOLEN SICK DAYS, A GRIEVANCE ON SENIORITY THAT DISAPPEARED, THE ACTIONS OF MY DOCTOR, ANTHONY BRUNO, THE PARTICIPATION OF THE BOARD OF EDUCATIONS MEDICAL EXAMINER, THE DESTRUCTION OF SWORN TESTIMONY FROM THE ONE UNEMPLOYMENT HEARING OF DEC. 4, 1992 AND IGNORED THE ISSUE THAT MY RIGHT TO DUE PROCESS HAD BEEN ROUTINELY VIOLATED WITH THE COOPERATION OF ATTORNEYS CLAIMING TO PROTECT MY RIGHTS. AS A RESULT OF THE ACTIONS OF THE ATTORNEYS NORTON AND CAVANAGH NO ISSUE OR ACTION OF ANY OF THE CONSPIRING HAS BEEN INVESTIGATED, ADJUCATED OR RESOLVED. AS STATED AND DOCUMENTED THE PARTIES INVOLVED IN A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS HAVE BEEN PROTECTED BY THE POLITICAL AND FINANCIAL POWER OF THE PARTIES INVOLVED, AND ASSURED THAT I HAVE NO PROTECTION UNDER ANY LAW, AND NO RECOVERY OF ANY OF THE MONEY ILLEGALLY WITHELD.

8. I HAVE SUPPLIED A DIRECTORY OF PARTIES WHO HAVE PARTICIPATED IN A ONGOING CONSPIRACY TO OBSTRUCT MY RIGHTS, IT IS THE BEST INFORMATION I CAN PROVIDE AT THIS TIME. I HAVE NO ADEQUATE WAY OF INVESTIGATING THE METHODS BY WHICH THE ATTORNEYS INVOLVED HAVE ARRANGED CORRUPTION THROUGHOUT THE AGENCIES OF THE STATE AND FEDERAL GOVERNMENT EXTENDING THEIR ACTIONS AS FAR AS THE JUSTICE DEPARTMENT IN WASHINGTON D.C. TO CONCEAL THE ACTIONS OF THEIR CONSPIRACY. CIRCUMSTANCES IMPLY THAT THE INTERESTS OF THE MIDDLESEX COUNTY AND MONMOUTH COUNTY DEMOCRATIC PARTIES



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HAVE BEEN SERVED BY THE CONSPIRING PARTIES, THOSE TWO PARTIES COMPRISE THE SIXTH CONGRESSIONAL DISTRICT. INSURANCE COMPANIES AND THE N.J.E.A ARE TWO PRIMARY POLITICAL AND FINANCIAL FORCES IN NEW JERSEY POLITICS, AND CONGRESSMAN PALLONE HAS THANKED THE N.J.E.A. FOR THEIR POLITAL AND FINANCIAL SUPPORT. INVESTIGATION FROM THIS POINT IS BETTER LEFT TO PROFESSIONALS, ANY INQUIRIES THAT I WOULD MAKE WOULD RESULT IN A PROPORTIONAL INCREASE IN RETALIATION.

I BELIEVE THAT THE INSURANCE COMPANIES INVOLVED, WASHINGTON NATIONAL INSURANCE COMPANY, VALIC ANNUITY, A OWNED SUBSIDIARY OF AMERICAN GENERAL, AND CONNECTICUT GENERAL LIFE INSURANCE COMPANY WOULD BE FOUND AS PARTIES MAKING CONTRIBUTIONS TO CONGRESSMAN PALLONE'S RE-ELECTION CAMPAIGN FUND. AS CONSPIRING PARTIES I BELIEVE THAT THESE ENTITIES WOULD FIND A MEANS OF PROVIDING FINANCIAL ASSISTANCE TO SUPPORT THEIR POLITICAL BENEFACTORS.

I SWEAR AND AVER THAT THE ALLEGATIONS, STATEMENTS AND ALL DOCUMENTS SUBMITTED HERE ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Edward H. Renaud

SIGNED AND SWORN TO BEFORE ME THIS EDWARD H RENAUD JR.
20th DAY OF March, 1995

Public Notary

JEAN COONTZ
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Oct. 28, 1997

AS A RESULT OF THE ACTIONS OF THE CONSPIRING PARTIES I HAVE NO LEGAL REPRESENTATION IN ANY ASPECT OF THIS MATTER. I HAVE, AS YOU WILL FIND IN THE ACCOMPANYING DOCUMENTS FILED THE SAME AFFADAVITS AND DOCUMENTS WITH THE JUSTICE DEPARTMENT, CIVIL RIGHTS DIVISION, COORDINATION AND REVIEW SECTION AS A A.D.A. TITLE II COMPLAINT AND WITH U.S. JUSTICE DEPARTMENT, ELECTION CRIMES



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DIVISION, AND THE FEDERAL ELECTION COMISSION. FOR 2½ YEARS I HAVE HAD NO PROTECTION FROM HARASSMENT, RETRIBUTION OR RETALIATION FROM THE PARTIES INVOLVED IN THIS COMPLAINT. APPARANTLY THAT PROTECTION WILL HAVE TO COME FROM SOME OTHER FEDERAL JURISDICTION AS DEMONSTRATED IN THE ACCOMPANYING DOCUMENTS SUPPORTING THIS COMPLAINT THE PARTIES INVOLVED HAVE NO REGARD FOR CONFIDENTIALITY UNLESS IT SERVES THEIR INTERESTS, THEY HAVE NO REGARD FOR STATE OR FEDERAL LAWS, CIVIL OR CRIMINAL.

PLEASE SEE PAGES DESIGNATED G-54 AND G-55 WHICH ARE ARTICLES FROM THE AREA NEWSPAPER, THE ASBURY PARK PRESS, G-54 DATES BACK TO THE MAY 1992 PRIMARY. IT IS NOT CONCLUSIVE EVIDENCE OF MY ALLEGATIONS, IT DESCRIBES THE POLITICAL SITUATION AND RAISES THE QUESTION IN COLUMN 4 AS TO WHY MIDDLESEX COUNTY WITH 65% OF THE DEMOCRATS IN THE SIXTH CONGRESSIONAL DISTRICT WAS UNABLE TO FIND A CANDIDATE TO OPPOSE REP. PALLONE IN 1994. IN COLUMN 3 REP. PALLONE ALSO STATES THAT "HE WAS TARGETED BY A "CABAL" OF DEMOCRATIC LEADERS WHO TRIED TO FORCE HIM OUT OF OFFICE BECAUSE OF HIS POLITICAL INDEPENDENCE. PAGE G 55 IS DATED FEB. 16, 1995, DESPITE THE FACT THAT REP. PALLONE'S ORGANIZATION HAD NO PRIMARY RACE TO FINANCE IT REMAINS OVER $35,000.00 IN DEBT. THE WHOLE OF THE INFORMATION I HAVE PROVIDED SHOULD BE CONSIDERED IN LIGHT OF THE EXTENSIVE ACTIONS OF THE ATTORNEY SHARON NORTON, THE CONSPIRING PARTIES AND THE SERIOUS VIOLATIONS OF CIVIL AND CRIMINAL LAWS, STATE AND FEDERAL LAW AND VIOLATIONS OF MY CONSTITUTIONAL RIGHTS. IT IS DIFFICULT FOR ME PROPERLY EVALUATE THE RATE OF EXCHANGE FOR TEN YEARS OF ACTIONS BY A CRIMINAL CONSPIRACY, I HAVE TO CONSIDER THAT IT MAY WELL BE EQUAL TO THE VALUE OF A UN-OPPOSED PRIMARY AND THE COMPLETE FINANCIAL SUPPORT OF THE TWO COUNTIES IN THE 1ITH CONGRESSIONAL DISTRICT.

RESPECTFULLY

Edward Bernard.



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Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718
908 495-2531

TO: THE HONORABLE FRANK PALLONE JR.

420 CANNON HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515-3006

Date DEC. 18, 1994

I AM REQUESTING YOUR ASSISTANCE IN A MATTER WHERE THE EDISON TOWNSHIP BOARD OF EDUCATION. AND EDISON TOWNSHIP EDUCATION ASSOCIATION HAVE CONSPIRED TO OBSTRUCT MY RIGHTS AS A HANDICAPPED PERSON SINCE 1984. I SPOKE TO YOU ON THIS ISSUE IN FEBRUARY OF 1994 FOLLOWING THE MEETING IN BELFORD ON THE FERRY PROPOSAL. I FOLLOWED YOUR ADVICE AND ATTEMPTED TO GAIN FURTHER ASSISTANCE FROM MRS. HAWLEY IN YOUR HAZLET OFFICE BUT SHE WAS NOT AVAILABLE. DESPITE LEGAL REPRESENTATION BY ATTORNEYS PAID BY THE N.J.E.A. I HAVE HAD NO PROTECTION FROM THREATS OF HARM, INVASION OF PRIVACY, VIOLATION OF MY RIGHTS UNDER CIVIL LAW, OR SERIOUS CRIMINAL ACTS. I HAVE BEEN ROBBED BY FRAUD OF OVER $75,000, MY HOME BURGLARIZED TO REMOVE DOCUMENTS RELATING TO CRIMINAL ACTIVITY BY THE BOARD OF EDUCATION. I'VE BEEN LIED TO, HARASSED, INSULTED AND SLANDERED BY PEOPLE WHO SHOULD HAVE ACTED TO ASSURE MY RIGHTS WERE PROTECTED.

AS YOU COULD REASONABLY EXPECT I AM UNDER CONSIDERABLE STRESS AFTER 2 1/2 YEARS OF ATTEMPTING TO PROTECT MYSELF FROM A LARGE NUMBER OF INDIVIDUALS AND ENTITIES WHO WOULD PREFER HARMING ME TO BEING PUNISHED FOR CRIMINAL ACTIVITY. THE NUMEROUS PARTIES INVOLVED CONTINUE TO THREATEN MY EMPLOYMENT, MY HEALTH, AND MY RIGHTS. THE COVER-UP OF CRIMINAL ACTIVITY IS SO EXTENSIVE THAT I CAN DOCUMENT MISCONDUCT IN THE JUSTICE DEPARTMENT.

PERHAPS AT THIS LATE DATE, AFTER MY LIFE HAS BEEN DESTROYED FOR 2 1/2 YEARS YOU CAN REPLY TO THE BOARD ATTORNEY'S LETTER OF MARCH 5, 1993 REFERRING YOU TO A ATTORNEY, THOMAS CAVANAGH OF LONG BRANCH NEW JERSEY WHO CLAIMED TO REPRESENT MY INTERESTS, OR IF YOU WOULD LIKE TO KNOW THE TRUTH YOU MAY CONTACT ME.

SINCERELY,
Edward Renaud

# PART I

## LETTER TO THE JUSTICE DEPARTMENT AND TITLE II COMPLAINTS

9504370050

Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718
908 495-2531

To: U.S. DEPARTMENT OF JUSTICE

CIVIL RIGHTS DIVISION
COORDINATION AND REVIEW SECTION
P.O. BOX 66118
WASHINGTON, D.C. 20035-6118

Date MARCH 19, 1995

I AM ADDRESSING THIS COMPLAINT TO THE COORDINATION AND REVIEW SECTION OF THE U.S JUSTICE DEPARTMENT AS A MATTER WHERE THE PARTIES NAMED IN THE DOCUMENTS AND AFFADAVITS I AM INCLUDING HAVE ACTED TO OBSTRUCT MY RIGHTS UNDER THE AMERICANS WITH DISABILITIES ACT. TO ASSURE THAT MY RIGHTS WERE OBSTRUCTED UNDER THE A.D.A. THEY HAVE VIOLATED MY RIGHT TO PRIVACY, EQUAL PROTECTION AND DUE PROCESS. THE PARTIES INVOLVED HAVE CROSSED THE LINE FROM CIVIL VIOLATIONS TO CRIMINAL VIOLATIONS LONG AGO; AS YOU WILL READ THEY HAVE USED MY DISABILITIES AND THE LEGAL PROCESS FOR THE PURPOSE OF OBSTRUCTING MY RIGHTS.

THE ORIGINAL PARTIES INVOLVED IN DISCRIMINATION UNDER THE A.D.A. WERE THE EDISON TOWNSHIP BOARD OF EDUCATION AND THE EDISON TOWNSHIP EDUCATION ASSOCIATION. IN SEPTEMBER OF 1992 THEY INCLUDED STEPHEN KLAUSNER AS A ATTORNEY PAID BY THE STATE UNION, THE NEW JERSEY EDUCATION ASSOCIATION TO ACT WITH THEM IN OBSTRUCTING MY. RIGHTS. UNDER THE A.D.A., THE NEW JERSEY LAW AGAINST DISCRIMINATION AND MY RIGHTS AS A TENURED TEACHER. FROM SEPTEMBER OF 1992 THROUGH JANUARY OF 1993 THE THREE PARTIES STATED COMBINED THEIR EFFORTS TO ASSURE THAT I HAD NO PROTECTION UNDER ANY LAW, AND AS STATED IN THE ACCOMPANYING BINDINGS OF DOCUMENTS THEY ENLARGED THEIR CONSPIRACY TO OBSTRUCT MY RIGHTS WITH ADDITIONAL PARTIES ALL ACTING WITH THE SAME INTENT, TO CAUSE DELAY AND DAMAGE ME AS MUCH AS POSSIBLE, THRU MY HEALTH, FINANCIALLY AND PROFESSIONALLY.

IN FEBRUARY OF 1993 IT WAS CLEAR THAT THE ATTORNEY STEPHEN KLAUSNER HAD NO INTENTION OF ADVISING ME,



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ASSISTING ME OR ACTING IN ANY JURISDICTION THAT WOULD PROTECT MY RIGHTS AS A TEACHER, AS A DISABLED TEACHER OR AS A VICTIM OF A GROWING CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS AS A RESPONSE TO MR. KLAUSNER'S COMPLETE ABANDONMENT I ACTED TO OBTAIN LEGAL COUNSEL THAT WOULD ACT IN MY BEHALF AND REALIZE NOW THAT I WAS "SET-UP" BY THE CONSPIRING PARTIES TO BE REFERRED TO TWO ATTORNEYS WHO WOULD ALSO BE PAID BY THE N.J. EDUCATION ASSOCIATION TO CONTINUE TO OBSTRUCT MY RIGHTS FOR A ADDITIONAL 14 MONTHS. DURING THEIR REPRESENTATION I DISCOVERED WHY THEY REFUSED TO ACT TO PROTECT ME; THE EDISON TOWNSHIP BOARD OF EDUCATION AND THE EDISON TOWNSHIP EDUCATION ASSOCIATION HAD BEEN CONSPIRING TO END MY EMPLOYMENT SINCE 1984 IN CIRCUMSTANCES WHERE I WOULD NOT BE ABLE TO ELECT TO CONTINUE MY BENEFITS FOR HEALTH CARE AT GROUP COSTS. 1984 WAS THE YEAR THAT THE BOARD OF EDUCATION HAD BECOME SELF-INSURED AND THAT THE TEACHERS ASSOCIATION HAD ENGAGED IN A CRIMINAL FRAUD TO REDUCE ME TO THE BOTTOM OF THE SENIORITY LIST SO THAT MY EMPLOYMENT COULD BE ENDED IN CIRCUMSTANCES THAT CONCEALED DIRCRIMINATION, CONSPIRACY AND UNION RACKATEERING.

I RECENTLY MADE A CONCLUSION REGARDING THE ATTORNEYS SHARON LYNCH NORTON AND THOMAS CAVANAGH WHO CLAIMED TO REPRESENT ME FROM FEBRUARY OF 1993 THROUGH APRIL OF 1994 WHEN THEY ABANDONED LEGAL REPRESENTATION. THESE TWO ATTORNEYS HAD A POLITICAL AND FINANCIAL INTEREST IN OBSTRUCTING MY RIGHTS AND ASSURING THAT THEIR WOULD BE NO DUE PROCESS UNDER ANY LAW IN ANY JURISDICTION. THEY ARE DIRECTLY INVOLVED IN MONMOUTH COUNTY DEMOCRATIC POLITICS. AND PARTICIPATED IN A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS FOR THE BENEFIT OF CONGRESSMAN PALLONES RUNNING AS A INCUMBENT IN THE 1994 CONGRESSIONAL ELECTION. IN EXCHANGE FOR CONCEALING A CRIMINAL CONSPIRACY THAT ORIGINATE IN MIDDLESEX COUNTY (EDISON IS IN MIDDLESEX) THESE TWO

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POLITICALLY ACTIVE ATTORNEYS IN MONMOUTH COUNTY (I LIVE IN BELFORD IN MIDDLETOWN, WHICH IS IN MONMOUTH CTY.) OBTAINED THE "RIGHT" FOR CONGRESSMAN PALLONE TO RUN UNOPPOSED IN THE 1994 SIXTH DISTRICT DEMOCRATIC PRIMARY AND THE COMPLETE FINANCIAL AND POLITICAL SUPPORT OF THE TWO COUNTIES FOR THE NOVEMBER 1994 ELECTION. THIS ALSO EXPLAINS HOW THE CONSPIRING PARTIES HAVE SPREAD THEIR CORRUPT INFLUENCE THROUGHOUT SIXTH CONGRESSIONAL DISTRICT, STATE AGENCIES AND FEDERAL AGENCIES.

TO PUT THIS COMPLAINT TOGETHER I HAVE SENT THE FOLLOWING BINDINGS OF DOCUMENTS:

PART 1 - CONSISTING OF THIS LETTER, A TITLE II COMPLAINT FORM ADDRESSING THE ISSUE IN THIS COMPLAINT, THAT THERE IS A ONGOING CONSPIRACY TO OBSTRUCT MY RIGHTS AND CONCEAL CRIMINAL ACTIVITY. (14 PAGES)
- A COMPLAINT REGARDING THE ACTIONS OF MY PHYSICIAN WHO HAS ACTED AS A CONSPIRING PARTY. (5 PAGES
- TOTAL OF 19 PAGES.

PART 2 -

COMPLAINT AND AMENDMENT FILED WITH THE NEW JERSEY DIVISION ON CIVIL RIGHTS - CONTAINING A COVER LETTER TO C. GREGORY STEWART DIRECTOR, (6 PAGES, A AMENDED COMPLAINT, 8 PAGES, AND 62 PAGES OF AFFADAVIT THAT REFERS TO ADDITIONAL STATEMENTS AND THE DOCUMENTS IN A SECOND BINDING OF 98 PAGES LABELED A (AMENDMENTS

IN RESPONSE TO THE FILING WITH THE NEW JERSEY DIV. ON CIVIL RIGHTS THEY HAVE POSTPONED ANY INVESTIGATION OF THE



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ORIGINAL COMPLAINT FILED IN JULY OF 1994 INDEFINITLY, THAT COMPLAINT IS NOW 8 MONTHS OLD. THE ORIGINAL COMPLAINT WAS HELD AND NOT SERVED ON THE BOARD OF EDUCATION UNTIL AFTER THE NOVEMBER CONGRESSIONAL ELECTION THE ADVISE IS THAT IT IS BEYOND THEIR JURISDICTION; THAT IF THE BOARD OF EDUCATION AND UNION ARE INVOLVED IN CRIMINAL ACTIVITY I MUST RETAIN A ATTORNEY TO ACT ON MY BEHALF. IN NEW JERSEY IT'S APPARANT THAT TO REPORT CRIMINAL CONSPIRACY I MUST HIRE ATTORNEY. WHICH HAS PROVEN TO BE IMPOSSIBLE.

PART 3 —

A BINDING OF STATEMENTS AND DOCUMENTS ON THE ACTIONS OF THE ATTORNEYS SHARON LYNCH NORTON AND THOMAS CAVANAGH WHO WERE PAID BY THE NEW JERSEY EDUCATION ASSOCIATION TO PARTICIPATE IN AND CONCEAL CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS. IT WAS PREPARED FOR ANOTHER JURISDICTION AND IS SUBMITTED HERE TO ATTEMPT TO CLARIFY THE MOTIVE FOR THEIR ACTIONS. IT CONSISTS OF PAGES SLN 1 THRU 15 WHICH REFERENCE THE SECTION G-1 THRU G-73, PAGES TC 1 THRU TC-8 WHICH HAS SOME ADDITIONAL CORRESPONDENCE INCLUDED AND REFER TO THE ACTIONS OF SHARON NORTON, HIS ASSOCIATE IN THE LAW FIRM OF CHAMLIN, ROSEN CAVANAGH & ULIANO.

PART 4 —

THE FEDERAL FILING IN DISTRICT COURT BY THE ABOVE NAMED ATTORNEY SHARON LYNCH NORTON. SHE FAILS TO MENTION THE CONSPIRING PARTIES, SHE HAD AVOIDED ANY CIRCUMSTANCE WHERE I COULD ENTER ANY STATEMENT REGARDING CONSPIRACY, AND DELAYED ANY ACTION IN ANY OTHER JURISDICTION. THAT WOULD HAVE PROTECTED ME FROM THE ACTIONS OF THE CONSPIRING PARTIES. SHE ENTERED NOTHING REFERRING TO CONSTITUTIONAL



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VIOLATIONS. IT WAS DISMISSED WITHOUT PREJUDICE IN THE CIRCUMSTANCE THAT I CANNOT FIND ANY ATTORNEY WILLING TO REVEAL CRIMINAL ACTIVITY OR THE PARTICIPATION OF NUMEROUS PARTIES IN A CONSPIRACY.

PART 5-

A DIRECTORY OF WITNESSES/PARTICIPANTS WHO HAVE ACTED IN A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS. THERE ARE NAMES INCLUDED THAT ARE NOT DOCUMENTED YET IN THE MATERIALS I HAVE INCLUDED. REGRETABLY I HAVE HAD NO ASSISTANCE IN 2½ YEARS IN DOCUMENTING A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS WHILE THE CONSPIRING PARTIES HAVE ACTED TO VIOLATE THE LAW WHILE ACTING TO ASSURE THAT THERE HAS BEEN NO JURISDICTION WHERE I COULD FILE THE CORRECT COMPLAINT. POLITICAL CORRUPTION THROUGH DEMOCRATIC POLITICS, THE STATES LARGEST AND MOST POLITICALY POWERFUL UNION, THE N. JEA, AND THE POLITICAL INFLUENCE OF INSURANCE COMPANIES HAS ASSURED THAT THE CONSPIRING PARTIES HAVE BEEN PROTECTED.

PART 6

A TITLE II COMPLAINT - ON THE ACTIONS OF THE NEW JERSEY DEPARTMENT OF LABOR, DIVISION OF PROGRAMS. UNEMPLOYMENT INSURANCE SERVICE. WHO ACTED AS A CONSPIRING PARTY IN WITHOLDING MY STATE AND FEDERAL BENEFITS FROM SEPTEMBER OF 1992 UNTIL MAY OF 1993. SINCE THAT TIME THEY HAVE CONTINUED TO ASSIST THE CONSPIRING PARTIES BY HARRASSING ME THROUGH HEARINGS SCHEDULED FOR THE BENEFIT OF THE EDISON TOWNSHIP BOARD OF EDUCATION; THE BOARD HAS REFUSED TO APPEAR AT ANY HEARINGS SINCE 1992 AND HAS BEEN GRANTED THE RIGHT TO APPEAL DESPITE THEIR REFUSAL TO APPEAR.



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IN ASSEMBLING THIS COMPLAINT I HAVE HAD TO RELY ON MY OWN ABILITIES AS A HANDICAPPED PERSON. MY TRAINING AND EXPERIENCE IS IN TEACHING INDUSTRIAL ARTS, NOT IN THE LAW. FOR 2½ YEARS I HAVE HAD TO DO ALMOST ALL OF THE WORK TO FILE THIS COMPLAINT. THE STATE OF NEW JERSEY PROVIDES NO ASSISTANCE TO DISABLED PEOPLE WHEN THEIR RIGHTS ARE VIOLATED. THIS FILING OF APPROXIMATELY 350 PAGES HAS SOME DUPLICATION OF DOCUMENTS OF ISSUES BECAUSE I HAVE PUT IT TOGETHER FROM PIECES OF MY ATTEMPTS TO FILE IN OTHER JURISDICTIONS. MUCH OF THE DOCUMENTS THAT I DO HAVE HAS BEEN LEFT OUT BECAUSE IT COVERS THE SAME ISSUES, THAT THE BOARD OF EDUCATION IS THE ORIGINAL OFFENDER ALONG WITH THE EDISON TOWNSHIP EDUCATION ASSOCIATION. THEY FOLLOWED A PATH THAT MUST BE FAMILIAR TO THE JUSTICE DEPARTMENT, THEY ENGAGED IN CRIMINAL ACTIVITY IN 1984 AND SAW NO OTHER SOLUTION THAN TO ENGAGE IN ADDITIONAL CRIMINAL AND CORRUPT ACTS TO CONCEAL WHAT THEY HAD DONE PREVIOUSLY AND THEN DEPENDED ON CORRUPTION TO CONCEAL THEIR ACTIONS. THEY HAVE HAD TOO MUCH SUCCESS UNTIL NOW; I HAVE INVESTED 2½ YEARS OF MY LIFE TRYING TO STOP THEM. BY NOW I KNOW THEM, THEY KNOW ME, AND THAT I WILL NOT STAND DOWN ON MY CONSTITUTIONAL RIGHTS. I WILL NOT STAND DOWN KNOWING WHAT THE BOARD OF EDUCATION HAS DONE TO PREGNANT WOMEN, DISABLED PEOPLE, PEOPLE OVER 55 AND PEOPLE WHO ARE TERMINALLY ILL. DURING THE PAST 2½ YEARS I DISCOVERED THAT THE PATTERN OF DISCRIMINATORY ACTION IS DIRECTED AT THOSE PEOPLE WHO HAVE REAL OR ANTICIPATED INCREASED MEDICAL COSTS AND THAT THE E.T.E.A. DOES NOTHING TO HELP THESE PEOPLE. FROM WHAT I HAVE BEEN TOLD BY OTHER TEACHERS AND SCHOOL STAFF I AM ONE OF FIRST INDIVIDUALS WHO REFUSES TO QUIT, REFUSES TO DIE AND REFUSES TO STAND DOWN ON MY RIGHTS.



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REGRETABLY I HAVE HAD TO STAND ALONE; THE BOARD OF EDUCATION HAS A WELL EARNED REPUTATION FOR HARASSMENT AND RETRIBUTION, CORRUPTION AND CRIME. THE TOWNSHIP OF EDISON HAS A WELL DOCUMENTED REPUTATION FOR CORRUPTION DATING BACK MORE THAN 20 YEARS AND IT IS MY UNDERSTANDING THAT THERE HAVE BEEN NEARLY CONSTANT FEDERAL INVESTIGATIONS IN TO ONE DEPARTMENT OR CORRUPT OFFICIAL FOR THE PAST 2 DECADES.

IT HAS BEEN SUGGESTED TO ME THAT IT WOULD BENEFIT A LARGE NUMBER OF VICTIMS OF DISCRIMINATION AND CORRUPTION IF THE ACTIONS OF THE BOARD OF EDUCATION, THE E.T.E.A., THE STATE UNION, THE N.J.E.A., AND THEIR RELATIONSHIP WITH THE WASHINGTON NATIONAL INSURANCE COMPANY WERE ALL THOROUGHLY INVESTIGATED. THEIR HAS NEVER BEEN ANY INVESTIGATION OF MY COMPLAINT WHERE I HAVE BEEN ALLOWED TO SUBMIT ANY MATERIAL OR PARTICIPATE, AND I CAN ASSURE YOU THAT THE STATE OF NEW JERSEY DOES NOT HAVE THE INTEREST OR POLITICAL WILL TO INVESTIGATE A CONSPIRACY WHERE THE N.J.E.A. OR INSURANCE COMPANIES ARE INVOLVED. THE INVOLVEMENT OF ATTORNEYS PAID BY THE N.J.E.A. WHO ARE PART OF A CONGRESSMAN'S POLITICAL ORGANIZATION ASSURES THAT AUTHORITIES DIRECTED BY THE STATE WILL IGNORE THE ACTIONS TAKEN TO OBSTRUCT MY RIGHTS. THE CONSENSUS OF WHAT ADVICE I CAN OBTAIN IS THAT NOTHING LESS THAN ACTION BY THE JUSTICE DEPARTMENT WILL RESOLVE ANY ASPECT OF THIS MATTER.

I HAVE NOT INCLUDED ALL OF THE DOCUMENTATION IN MY POSSESSION REGARDING THE ACTIONS OF THE WASHINGTON NATIONAL INSURANCE COMPANY WHO PARTICIPATED IN THE CONSPIRACY TO OBSTRUCT MY RIGHTS FROM OCTOBER OF 1992 THRU OCTOBER OF 1993. AS THE NEW JERSEY EDUCATION ASSOCIATION ENDORSED DISABILITY INSURER THEY PARTICIPATED IN THE



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ESSENTIALLY THE SAME WAY AS OTHER PARTIES, THEY ACTED TO DAMAGE ME FINANCIALLY, INTIMIDATE ME AND HARASS ME DURING THAT PERIOD.

I HAVE NOT COMPLETED A AFFADAVIT REGARDING THE CIRCUMSTANCES OF MY RETURN TO EMPLOYMENT DELAYED BY THE CONTINUING SUSPENSION WITHOUT PAY OR DUE PROCESS UNTIL OCT. 15, OF 1993, A VIOLATION OF MY CONSTITUTIONAL RIGHTS. THIS WAS DONE IN THE CIRCUMSTANCES THAT THE N.J.E.A. PAID ATTORNEY SHARON LYNCH NORTON HAD ARRANGED THRU CORRUPT INFLUENCE TO DELAY A RIGHT TO SUE LETTER UNTIL JANUARY 13 OF 1994. DURING THAT TIME MY EMPLOYER THE BOARD OF EDUCATION REGULARLY AND MALICIOUSLY ENGAGED IN HARASSMENT IN A ATTEMPT TO DETER ME FROM FINDING A WAY TO DEFEND MYSELF FROM THEIR ACTIONS OR THOSE OF THE N.J.E.A PAID ATTORNEYS. THEIR INTEREST IS WHAT I KNOW TO BE A COMMON COURSE OF ACTION, TO ATTEMPT TO MANUFACTURE EVIDENCE OF INCOMPETENCE, INCAPACITY OR PROFESSIONAL MISCONDUCT.

BY MARCH OF 1994 THEY HAD GROWN INCREASINGLY DESPERATE AND ENGAGED IN A INVASION OF PRIVACY BY SEARCHING THE BASEMENT OF MY MOTHER'S HOME IN CLARK, NEW JERSEY. AT THAT TIME MY MOTHER WAS NEARLY BLIND AND UNKNOWINGLY ALLOWED A INDIVIDUAL ACCOMPANIED BY A NEIGHBOR TO ENTER THE BASEMENT OF HER HOME ON THE CLAIM THAT THEY WERE LOOKING FOR "PRESSURE", A RIDICULOUS FRAUDULENT CLAIM. I CAN NOT ASSESS WHAT THEY HAD HOPED TO FIND, BUT AS I EXPLAINED TO MY ELDERLY MOTHER THAT THE WATER PRESSURE IN THE KITCHEN WOULD BE EQUAL TO THE PRESSURE IN THE BASEMENT. I ALSO EXPLAINED TO MY MOTHER THAT THEY HAD PREDICATED THEIR SEARCH ON A CLAIM THAT THERE HAD BEEN A WATER LEAK IN THE STREET FROM FROZEN PIPES AND THAT I HAD WALKED THE BLOCK I HAD LIVED ON FOR 30 YEARS AND COULD NOT FIND A SINGLE SIGN OF A LEAK OR ANY EXCAVATION THAT WOULD INDICATE A REPAIR. THIS IS INDICATIVE



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OF THE SITUATION THAT HAS EXISTED THROUGHOUT, THEY ARE DESPERATE AMATUERS ENGAGED IN CRIME. I HAVE "CAUGHT" THEM OVER AND OVER ONLY TO FIND THAT THEY HAVE THE ABILITY AND ADVANTAGE TO HAVE POLITICAL CORRUPTION PROTECT THEM IN EVERY JURISDICTION.

I WILL ON RESPONSE FROM THE JUSTICE DEPARTMENT SUPPLY ANY ADDITIONAL DOCUMENTS OR AFFADAVITS THAT I HAVE. FOR 2½ YEARS NO JURISDICTION HAS BEEN AVAILABLE TO ME TO PRESENT ANY TESTIMONY, DOCUMENTS OR COMPLAINTS. THE MATERIAL I HAVE PRESENTED TO THE DIVISION ON CIVIL RIGHTS HAS RESULTED IN THEIR REFUSAL TO TAKE ANY ACTION.

THERE REMAIN ISSUES THAT I HAVE NOT BEEN ABLE TO INVESTIGATE. THE FIRST IS THE UNPROVABLE ALLEGATION THAT MY PHONE HAS BEEN TAPPED. THE BEST INFORMATION ON THAT ISSUE HAS CAME FROM A SUPERVISOR IN SECURITY AT THE PHONE COMPANY AFTER MESSAGES HAD "DISAPPEARED" FROM MY ANSWERING MACHINE. IT WAS NOT VERY REASSURING. THE SUPERVISOR ASSURED ME THAT IF IT WAS A MATTER OF POLITICAL CORRUPTION IN THE STATE GOVERNMENT THAT I COULD EXPECT THAT MY PHONE WAS TAPPED. IF TRUE IT WOULD EXPLAIN A NUMBER OF CIRCUMSTANCES WHERE CONVERSATIONS I HAVE HAD HAVE ACTUALLY PRECIPITATED A RESPONSE FROM THE PARTIES INVOLVED. IN REPEATED INSTANCES THE ATTORNEYS INVOLVED CUT OFF CONVERSATIONS REFUSING TO DISCUSS ISSUES SUCH AS THE SICK DAYS MISSING FROM MY ACCOUNT, THE ACTIONS OF THE CONSPIRING PARTIES AND THE REPEATED VIOLATIONS OF MY CONSTITUTIONAL DUE PROCESS RIGHTS.

A SECOND ISSUE IS THAT THERE EXISTS A POSSIBILITY THAT FOLLOWING THE SUPERINTENDENT OF SCHOOLS, JOSEPH KREISKEY AND LORENE MOORE MAKING THE FALSE AND MALICIOUS CHARGE OF NO ATTENDANCE (SEE PAGES A-71, A-73 - PAGE 72 DOES NOT EXIST) AND THE BOARD OF EDUCATION VOTED TO TERMINATE MY EMPLOYMENT THAT THEY PROCEEDED BEFORE THE COMMISSIONER OF EDUCATION WITH THAT CHARGE. THEIR ACTIONS FROM THAT TIME POINT FIT



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THE PARAMETERS IN STATE LAW FOR TERMINATING A TENURED TEACHER AND FIT THE PATTERN OF THEIR ACTIONS WHERE THEY HAVE MADE EVERY ATTEMPT TO PROCEED IN SECRET. IN A CONVERSATION OF OCTOBER 1994 THE E.T.E.A. GRIEVANCE CHAIRMAN FRED CIOCIOLA STATED TO ME THAT THE ATTORNEY STEAHEN KLAUSNER HAD "HANDLED" THAT ACTION BY THE BOARD OF EDUCATION. THIS IS THE SAME N.J.E.A. PAID ATTORNEY WHO CLAIMED TO BE REPRESENTING ME IN SEPT. OF 1992 AND ASSISTED THE BOARD OF EDUCATION IN PASSING OFF VIOLATIONS OF MY CONSTITUTIONAL RIGHTS AS A FAILURE TO ACCOMMODATE MY DISABILITIES.

THE ONLY SOURCE TO OBTAIN A RECORD OF A COMMISSIONER'S DECISION ON THIS ISSUE WOULD BE THE MIDDLESEX COUNTY SUPERINTENDENT OF SCHOOLS, AND I EXPECT THAT IF THE COMMISSIONER OF EDUCATION HAD ACTED TO PARTICIPATE IN VIOLATING MY CONSTITUTIONAL RIGHTS IT WILL REQUIRE A SUBPOENA TO OBTAIN ANY DOCUMENTS. AS STATED THE EDISON TOWNSHIP BOARD OF EDUCATION HAS REFUSED TO PROVIDE ANY ACCOUNTING OF MY MISSING SICK DAYS, AND HAS NEVER ALLOWED ME TO SEE ALL OF THE MATERIAL IN MY PERSONNEL FILE, A VIOLATION OF STATE LAW.

AS CAN BE EXPECTED I WOULD APPRECIATE AS RAPID A RESPONSE AGAINST THE CONSPIRING PARTIES AS POSSIBLE. I WOULD ALSO APPRECIATE ACKNOWLEDGEMENT OF THIS COMPLAINT BY MAIL PHONE. I HAVE HAD NO PROTECTION UNDER ANY LAW FOR 2½ YEARS AND NO ONE TO ASSIST ME AGAINST A CRIMINAL POLITICALLY SPONSORED CONSPIRACY. I CAN ASSURE YOU THAT THESE PEOPLE ARE INCREASINGLY FRIGHTENED THAT THEY WILL BE CAUGHT AND PUNISHED FOR THEIR ACTIONS. I CANNOT ACCURATELY EVALUATE HOW DANGEROUS THEY MAY BE OR WHAT ADDITIONAL ACTIONS THEY MAY TAKE TO CONCEAL THEIR ACTS. THEY HAVE NO REASON TO FEAR ME ALONE; IT MUST BE THE POWER OF THE JUSTICE DEPARTMENT. I AM REASONABLY SURE THAT



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THE FIRST CONTACT OR INQUIRY BY THE JUSTICE DEPARTMENT WILL PROBABLY END OR AT LEAST DELAY ANY FURTHER ACTIONS THEY MAY TAKE AGAINST ME. THEY HAVE PROCEEDED THROUGHOUT WITH COMPLETE DISREGARD FOR STATE, FEDERAL AND CONSTITUTIONAL LAW, DEPENDED ON CORRUPTION AND KNOWING THAT PARTIES INVOLVED IN CONSPIRACY CAN'T BACK OUT WITHOUT DAMAGING THEMSELVES.

I APOLOGIZE FOR ANY ERRORS IN SPELLING, GRAMMAR, OMISSIONS OF WORDS OR MISNUMBERING OF PAGES. THE SITUATION THAT EXISTS IS THAT I HAVE BEEN UNDER DURESS FOR 2½ YEARS, THAT MY DISABILITY LIMITS THE TIME SPAN THAT I CAN READ WITH COMPREHENSION AND WRITE WITH ACCURACY. THE PARTIES INVOLVED HAVE USED MY DISABILITY KNOWING THAT HARRASSMENT WOULD DESTROY THE TIME THAT I HAVE TO ATTEMPT TO DEFEND MYSELF. THE PARTIES INVOLVED HAVE THE TAXPAYERS MONEY, UNION MONEY, INSURANCE COMPANY MONEY AND PAID PROFESSIONAL EMPLOYEES TO DO THEIR DIRTY WORK.

I EXPECT THAT ATTORNEYS IN THE JUSTICE DEPARTMENT WILL RECOGNIZE CRIMINAL, CIVIL AND CONSTITUTIONAL VIOLATIONS THAT I HAVE NOT, AND I HOPE THAT I HAVE PRODUCED ENOUGH COHESIVE MATERIAL TO DOCUMENT THAT THIS IS NOT A SIMPLE A.D.A DISPUTE. HERE THE PARTIES INVOLVED HAVE ACTED TO PASS OF A CRIMINAL CONSPIRACY AS A SINGLE CIVIL VIOLATION, "FAILURE TO ACCOMMODATE MY DISABILITIES" BY MY EMPLOYER THE EDISON BOARD OF EDUCATION.

RESPECTFULLY,

Edmund Renaud



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U.S. Department of Justice
Civil Rights Division
*Coordination and Review Section*

# Title II of the Americans with Disabilities Act / Section 504 of the Rehabilitation Act of 1973 Discrimination Complaint Form

**Instructions: Please fill out this form completely, in black ink or type. Sign and return it to the address on page 3.**

Complainant: EDWARD H. RENAUD

Address: 508 FOX AVE.

City, State and Zip Code: BELFORD, N.J. 07718

Telephone: Home : 908-495-2531

Business : 908-985-2900

Person Discriminated Against: (if other than the complainant) _____

Address: _____

City, State and Zip Code: _____

Telephone: Home : _____

Business : _____

Government, or organization, or institution which you believe has discriminated:

Name: THE EDISON TOWNSHIP BOARD OF EDUCATION, THE EDISON TOWNSHIP EDUCATION ASSOCIATION THE NEW JERSEY DEPARTMENT OF LABOR, N.J. DIVISION ON CIVIL RIGHTS

Address: THE NEW JERSEY EDUCATION ASSOCIATION. AND THE ADDITIONAL PARTIES STATED IN THE ENCLOSED DOCUMENTS AND AFFIDAVITS.

City, State and Zip Code: THIS IS A MATTER WHERE THE PARTIES INVOLVED HAVE CONSPIRED TO OBSTRUCT MY RIGHTS.

Telephone Number: SEE DIRECTORY, PART 5

When did the discrimination occur? Date : IT IS A ONGOING MATTER DATING FROM 1984 SEE ACCOMPANYING DOCUMENTS

OMB Approval No. 1190-0009

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Describe the acts of discrimination providing the name(s) where possible of the individuals who discriminated (use space on page 3 if necessary): PLEASE ADDITIONAL PAGES ATTACHED

Have efforts been made to resolve this complaint through the internal grievance procedure of the government, organization, or institution? Yes ☐ No ☒ SEE BELOW

~~If "yes" what is the status of the grievance~~?

FOR THE PAST 2½ YEARS I HAVE NOT BEEN ALLOWED TO FILE THE CORRECT COMPLAINT IN ANY JURISDICTION. THE CONSTITUTIONAL RIGHT TO DUE PROCESS IS NOT RECOGNIZED IN NEW JERSEY IN MATTERS OF POLITICAL CORRUPTION, INSURANCE FRAUD, CONSPIRACY OR UNION RACKATEERING. THE ACCOMPANYING DOCUMENTATION STATES THE HISTORY OF THIS COMPLAINT.

Has this complaint been filed with another bureau of the Department of Justice or any other Federal, State, or local civil rights agency or court? Yes ☒ No ☐ SEE ACCOMPANYING DOCUMENTS REGARDING THESE COMPLAINTS. PARTICULARLY

If "yes":

Agency or Court: N.J. DIVISION ON CIVIL RIGHTS

Contact Person: DARREN J. BOLDEN, INVESTIGATOR

Address: DIVISION ON CIVIL RIGHTS

THE N.J. DIVISION ON CIVIL RIGHTS HAS MADE NO INVESTIGATION OF THIS COMPLAINT AND STATED THAT IT IS BEYOND THEIR JURISDICTION.

City, State and Zip Code: CN 090, TRENTON, N.J. 08625-0090

Telephone Number: 609 984-3059

Date Filed: JULY 13, 1994



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| Do you intend to file with another agency or court? | Yes [X] | No [ ] |
|---|---|---|
| Agency or Court: | FEDERAL ELECTION COMMISSION | U.S. JUSTICE DEPARTMENT, ELECTION CRIMES |
| Address: | OFFICE OF GENERAL COUNSEL | 1400 NEW YORK AVE. |
| City, State and Zip Code: | WASHINGTON, D.C. 20463 | P.O. BOX 27518 WASHINGTON, D.C. 20038 |
| Telephone Number: | 1-800-424-9530/202-219-3420 | 202-514-1421. |

Additional space for answers:

Signature: Edward Renaud.

Date: MARCH 18, 1995

Return to:

U.S. Department of Justice
Civil Rights Division
Coordination and Review Section
P.O. Box 66118
Washington, DC 20035-6118



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# PART 2

## COMPLAINT AND AMENDMENDMENTS FILED WITH THE NEW JERSEY DIVISION ON CIVIL RIGHTS

REFERENCES DOCUMENTS IN BINDING TITLED "CONTINUATION OF PART 2"

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Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718
908 495-2531

C. GREGORY STEWART, DIRECTOR
DIVISION ON CIVIL RIGHTS.
CN 089
TRENTON N.J. 08625-0089

JAN 9, 1995

RE: RENAUD VS EDISON TOWNSHIP BOARD OF EDUCATION.
DOCKET NO. EMOSHE-38105 E.

I AM FILING THE ACCOMPANYING AMENDMENTS TO THE ABOVE REFERENCED COMPLAINT. TO EXPEDITE MY WORK I HAVE TAKEN THE ORIGINAL COMPLAINT AND USED IT AS A FORMAT FOR THE AMENDMENTS AND THE INCLUSION OF THE SECOND PARTY. THE EDISON TOWNSHIP EDUCATION ASSOCIATION.

I HAVE ALSO COMPILED A AFFADAVIT OF 160 PAGES ON THE CAUSE OF THE EDISON TOWNSHIPS ADVERSE ACTIONS DATING FROM 1984. IT IS INCOMPLETE IN THAT IT DOES NOT THOROUGHLY STATE THE ACTIONS OF THE BOARD SINCE SEPTEMBER OF 1993 WHEN I WAS RETURNED TO WORK WITH NO MEANS OF PROTECTING MY SELF FROM HARASSMENT WHICH HAS CONTINUED TO THE PRESENT. ATTORNEYS PAID BY THE N.J.E.A. HAD BREACHED THEIR DUTY OF FAIR REPRESENTATION IN FAILING TO TAKE ANY ACTION TO RESOLVE ANY ASPECT OF THIS DISPUTE. THERE INTEREST THROUGHOUT WAS TO PROTECT THE PARTIES WHO HAD SINCE 1984 CONSPIRED TO OBSTRUCT MY RIGHTS.

AS COMPLAINANT I WOULD ALSO MAKE THE MOTION THAT THE DIRECTOR ACT TO INVESTIGATE THIS MATTER. ACTIONS OF THE BOARD OF EDUCATION AND E.T.E.A. HAVE BEEN TO ACT TOGETHER TO DISCRIMINATE AGAINST A SPECIFIC CLASS OF PEOPLE WHO ARE THOSE WHO HAVE EXPERIENCED REAL OR ANTICIPATED HEALTH CARE COSTS. AN INVESTIGATION WOULD ALSO

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ACCOMMODATE MY DISABILITIES AND ASSIST ME IN MAKING THE COMPLETE DOCUMENTATION OF THE ACTIONS TAKEN AGAINST ME SINCE 1984. THE DISABILITY NARCOLEPSY SEVERELY LIMITS MY ABILITY TO READ AND WRITE FOR LONG PERIODS. SINCE AUGUST OF 1992 I HAVE BEEN IN A STATE OF ANXIETY AND HAD TO ACT UNDER DURESS IN A CONTINUING ATTEMPT TO PROTECT MY RIGHTS, DOCUMENT THE ACTIONS OF THE BOARD OF EDUCATION AND THE ADDITIONAL INVOLVED PARTIES.

I WOULD APPRECIATE ANY ASSISTANCE THAT THE DIVISION ON CIVIL RIGHTS CAN PROVIDE IN BRINGING AN END TO TEN YEARS OF VIOLATION OF MY RIGHTS. I HAVE HAD VERY LITTLE ASSISTANCE FOR THE PAST 2½ YEARS AND FOUND MYSELF IN A SITUATION WHERE MY RIGHTS CAN BE VOLATED FASTER THAN I CAN UNDERSTAND, DOCUMENT, REPLY OR FILE A COMPLAINT.

THERE REMAINS A NUMBER OF ISSUES AND ADVERSE ACTIONS THAT HAVE BEEN UNABLE TO RECORD AND DOCUMENT HERE, BUT NEED TO BE ADDRESSED, THEY ARE

1. THAT THE N.J.E.A. PAID ATTORNEYS RETURNED ME TO EMPLOYMENT FOR THE 1993-1994 WITH NO COMPLAINT FILED AND HAD ASSURED THAT NO RETALIATION CLAIM COULD BE MADE, THAT THE ACTIONS OF THE BOARD AND OTHER PARTIES WERE UNRELATED TO THIS DISPUTE. APPARENTLY MRS. NORTON HAD ARRANGED FOR THE "RIGHT TO SUE LETTER TO BE DELAYED A ADDITONAL 5 MONTHS UNTIL JANUARY AND THEN CLAIMED THAT IT WAS BUREAUCRATIC ACTION THAT CAUSED THE DELAY.

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2. THAT THROUGHOUT THE 1993-1994 SCHOOL YEAR I WAS SUBJECTED TO HARRASSMENT AND RETALIATION, THAT AS WITH OTHER ISSUES, IGNORED BY N.J.E.A. ATTORNEYS.

3. THAT IN MRS. NORTON'S FILING A FEDERAL COMPLAINT IN APRIL OF 1994 SHE AND MR. CAVANAGH LEFT OUT THE TRUE CAUSE OF EDISON'S ADVERSE ACTIONS, THAT THEY DATED FROM 1984, THAT THE E.T.F.A. WAS A CONSPIRING PARTY, AND IN EFFECT HAD REDUCED 10 YEARS OF DISCRIMINATION AND OBSTRUCTION OF MY RIGHTS TO "FAILURE TO ACCOMMODATE" MY DISABILITY. THE POSITION OF THESE ATTORNEYS WAS THAT THEY KNEW NOTHING ABOUT CONSPIRING PARTIES, THAT I COULD, DESPITE MY DISABILITIES, APPEAR "PRO SE" IN FEDERAL COURT, AND IF I DID NOT LIKE THE "AGREED" COURSE OF ACTION THEY HAD PURSUED I COULD, IN MR. CAVANAGH'S WORDS, GO TO LAW SCHOOL AND. LITIGATE MY OWN. CASE.

4. THAT AS I FEARED AND EXPECTED I WAS RETURNED TO WORK FOR THE 1993.-1994 SCHOOL YEAR IN A HOSTILE SITUATION. I HAD IN APRIL OF 1993 ATTEMPTED TO FILE WHAT IS ESSENTIALLY THE SAME DOCUMENTATION CONTAINED IN THE AFFADAVIT SUBMITTED HERE, AND FOUND THAT I WAS CONSTANTLY BEING HARASSED AND THAT THE ONLY DEFENSE I HAD. WAS TO WORK AS HARD AS I COULD TO OVERCOME MY DISABILITIES, PROTECT MY JOB, MY RIGHTS, AND MY HEALTH WITHOUT LEGAL ADVICE OR ASSISTANCE. THE POSITION OF N.J.E.A. ATTORNEYS HAVE BEEN A CONSTANT, THAT SOMEDAY THE ISSUE OF "FAILURE TO ACCOMMODATE" WOULD BE ADDRESSED "SOME DAY".

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5. IN APRIL OF 1994 MRS. NORTON CLAIMED A CONFLICT OF INTEREST BASED ON HER STATEMENT TO ME THAT IF I TURNED ON HER SHE COULD BE IMPLICATED IN CONSPIRING TO OBSTRUCT MY RIGHTS AND RACKATEERING. AS I HAD BEEN WARNED, EXPECTED FEARED, AND COULD NOT AVOID MRS. NORTON THEN ACKNOWLEDGED THE CONFLICT OF INTEREST THAT HAD EXISTED THROUGHOUT REGARDING THE E.T.E.A., AND WASHINGTON NATIONAL INSURANCE COMPANY. THAT CLAIM OF CONFLICT OF INTEREST SHE PUT IN WRITING TO CONCEAL HER ACTIONS IN OBSTRUCTING MY RIGHTS.

6. THAT BY JUNE OF 1994. THE BOARD, E.T.E.A, AND N.J.E.A. PAID ATTORNEYS HAD ACHIEVED THEIR GOAL DATING FROM 1984, THEY DROVE ME OUT OF EMPLOYMENT. DURING THE 20 MONTHS OF N.J.E.A. REPRESENTATION I HAD NO PROTECTION OF MY RIGHTS AS A HANDICAPPED PERSON, NO PROTECTION AS A TENURED TEACHER AND MY CONTITUTIONAL RIGHTS TO PRIVACY, DUE PROCESS, AND EQUAL PROTECTION UNDER THE LAW HAD BEEN VIOLATED AND OBSTRUCTED. FROM JUNE 6 THROUGH THE LAST DAY OF SCHOOL I SOUGHT THE ONLY MEANS OF REFUGE I COULD FIND BY STAYING HOME AND ATTEMPTING TO COMPLETE THE RECORD OF EVENTS FROM 1984 OF OBSTRUCTION OF MY RIGHTS. THE SITUATION REMAINS UNCHANGED THAT APPARANTLY THERE IS NO MEANS BY WHICH A HANDICAPPED PERSON CAN BE PROTECTED WHEN THE BOARD OF EDUCATION, E.T.E.A. AND N.J.E.A. HAVE WIELDED POLITICAL POWER TO OBSTRUCT MY RIGHTS.

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7. I CONTINUED THRU THE SUMMER OF 1994 TO WORK UNDER DURESS TO ATTEMPT TO DOCUMENT AND FILE THE COMPLETE RECORD OF EVENTS DATING FROM 1984. WITH THE INTENTION OF FINDING THE CORRECT JURISDICTION. MY EXPERIENCE HAS BEEN CONSISTENT, THAT WHEN I CONTACT A GOVERNMENT AGENCY, THEY CLAIM JURISDICTION AND ENCOURAGE ME TO "WRITE A LETTER" TO INITIATE INVESTIGATION AND ACTION. WHEN I RESPOND BY SUPPLYING DOCUMENTATION OF 10 YEARS OF CONSPIRACY, CRIMINAL AND CIVIL VIOLATIONS BY A LENGTHY LIST OF INDIVIDUALS OR ENTITIES. THEY THEN DENY JURISDICTION, IN ANY ASPECT OF WHAT HAS BECAME A "CIVIL MATTER".

APPARENTLY WHEN LINKED PARTIES ACT AT THE SAME TIME WITH THE SAME INTENT IT IS NOW "COINCIDENCE TO OBSTRUCT", A CIVIL VIOLATION THAT I CANNOT FIND MENTIONED IN THE LAW, AND ONE THAT FALLS IN NO ONE'S JURISDICTION.

8. IN RETURNING TO WORK IN SEPT. OF 1994 THE BOARD AGAIN BREACHED MY EMPLOYMENT BY "THEFT BY WITHOLDING" OF MY PAY FOR SICK DAYS THAT I HAD NOT TAKEN FOR THE FIRST PAY PERIOD. THEY HAVE REPEATED THEIR ACTIONS TO VIOLATE MY RIGHTS AGAIN, PRODUCE A BREACH IN MY EMPLOYMENT FRAUDULENTLY AND BY ENGAGING IN MALICIOUS AND INTENTIONAL ACTS ASSURE THAT NO ONE WILL ACCEPT A COMPLAINT.

9. IN RESPONSE TO THE ABOVE (#8) I FILED A GRIEVANCE, THE E.T.E.A. EDITED IT, TRIED TO COERCE ME TO ACCEPT A DENIAL OF MY RIGHT TO THE GRIEVANCE PROCESS AND FORCE ME

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9. CONT.

TO TAKE IT TO THE N.J. E.A. PAID ATTORNEY STEPHEN KLAUSNER WHO ACTED TO OBSTRUCT MY RIGHTS IN. 1992. ON MY INSISTENCE THE E.T.E.A. ALLOWED MY GRIEVANCE TO BE "HEARD" WHICH CONSISTED OF HAVING THE ASSISTANT SUPERINTENDENT TELL ME THAT THEY WOULD REPLACE SOME OF THE ~~DAYS~~ STOLEN SINCE 1983. THEY CONTINUE TO DENY ME ANY ACCESS TO THE RECORD OF MY SICK DAY ACCUMULATION SINCE 1984. AS A RESULT I CANNOT TELL WHETHER THE FRAUDULENT BREACH OF MY EMPLOYMENT BY THE BOARD'S CLAIMING I WAS ABSENT HAS BEEN ERASED. AS THEY HAVE FOR 10 YEARS THEY HAVE PRODUCED A FRAUD, PROCEEDED IN SECRET AND VIOLATED MY RIGHTS.

SINCERELY,

Edward Renaud.

EDWARD RENAUD.

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*State of New Jersey*
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION ON CIVIL RIGHTS
CN 090
TRENTON, NJ 08625-0090

DEBORAH T. PORITZ
ATTORNEY GENERAL

C. GREGORY STEWART
DIRECTOR

ADDRESS REPLY TO:
Trenton Regional Office
CN 090
Trenton, N.J. 08625-0090
(609) 292-4605

November 1st, 1994

Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Re: Renaud vs. Edison Township Board Of Ed.
Docket No. EM05HE-38105-E

Dear Mr. Renaud:

We hereby acknowledge receipt of your complaint which has been assigned the above docket number. Your complaint has been served on the named Respondent who is required to provide specific information in relationship to the allegations contained in your charge.

In further correspondence on this matter, please use the docket number shown above.

Inquiries should be directed to:

Sandi Van Hise

(609)984-3056
Telephone Number

Thank you for your prompt attention to this matter.

Very truly yours,

Atley R. Tyler/RAV
Atley R. Tyler
Regional Manager

ENC. (XX)Verified Complaint
Certified Mail Number: P264614729

LLPS

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CIVIL RIGHTS



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STATE OF NEW JERSEY
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION ON CIVIL RIGHTS
DOCKET NO. EM05HE-38105H

Edward Renaud

Complainant(s)

-vs-

Edison Township Board Of Ed.

Respondent(s)

VERIFIED COMPLAINT

Received and Recorded
Date: 07/13/1994
Department of Law & Public Safety
By: Oliver W. DeWeever

1. The Complainant(s) reside(s) at:

508 Fox Avenue
Belford, NJ 07718
Monmouth County

2. To the best of Complainant's knowledge and belief, the Respondent(s) is (are) known as:

Edison Township Board Of Ed. THE EDISON TOWNSHIP EDUCATION ASSOCIATION.

and is (are) located at:

100 Municipal Boulevard
Edison, NJ 08818
Middlesex County

DURHAM CENTER STE. 203A
2 ETHEL ROAD
EDISON, N.J. 08817

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3. The above named Respondent is hereby charged with unlawful employment practice within the meaning of the New Jersey Law Against Discrimination (N.J.S.A. 10:5-1 et. seq) and specifically within the meaning of Section Four and Section 12, Subsection (a),(),( ), of said Law because of Race ( ), Color ( ),National Origin ( ), Ancestry ( ); Armed Forces Eligibility ( ),Age ( ), Sex ( ), Affectional or Sexual Orientation, ( ), Marital Status ( ), Physical Handicap (X), Creed ( ), Reprisal ( ).

4. The charge is based on the following facts:

   a. Complainant was hired by Respondent(s) on: 02/17/1974

   b. Complainant was discriminated against in that:

      I. PERSONAL HARM

Complainant was denied reasonable accommodation and had his income reduced.

THAT IN 1984 THE EDISON TOWNSHIP BOARD OF EDUCATION AND THE EDISON TOWNSHIP EDUCATION CONSPIRED TO OBSTRUCT MY RIGHT TO EMPLOYMENT AND MEDICAL BENEFITS, A MATTER OF ECONOMIC DISCRIMINATION BASED ON REAL AND ANTICIPATED MEDICAL COSTS.

THAT THIS IS A MATTER OF ONGOING DISCRIMINATION, THAT IN AUGUST OF 1992 THE BOARD OF EDUCATION ACTED MALICIOUSLY AND INTENTIONALLY WITH THE INTENT OF ENDING MY EMPLOYMENT BY REFUSING TO ACCOMMODATE MY DISABILITIES, VIOLATING MY RIGHTS AS A TENURED AND CERTIFIED TEACHER AND OBSTRUCTING MY DUE PROCESS RIGHTS AS SPECIFIED IN N.J.S.A. TITLE 18A KNOWN AS SCHOOL LAW.

THAT THE TRUE AND CORRECT FACTS OF THIS DISPUTE ARE TO MY KNOWLEDGE AND UNDERSTANDING ARE STATED IN THE ACCOMPANYING AFFADAVIT. THE AFFADAVIT IS A "WORK IN PROGRESS" IN THAT MY DISABILITIES AND HARASSMENT HAVE LIMITED MY ABILITY TO INVESTIGATE, DOCUMENT AND RECORD

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THE COMPLEX VIOLATIONS OF LAW, ACTS AND EVENTS DATING TO 1984.

II. RESPONDENT'S REASON FOR ADVERSE ACTION

Respondent Chairperson, John Coe gave Complainant no reason for the treatment.

THAT THE REASON FOR THE ADVERSE ACTION IN DENYING ACCOMMODATION TO MY DISABILITIES IN AUGUST OF 1992 THRU OCT OF 1993 WAS TO COERCE ME TO END MY EMPLOYMENT AS A MEANS OF ASSURING THAT I WOULD NOT BE ABLE TO ELECT CONTINUATION OF MY HEALTH BENEFITS AT GROUP COST AS IS STATED IN N.J.S.A. 17B:27-51.12.

THAT IN NO INSTANCE WAS I GIVEN ASSISTANCE IN DISCOVERING THE ACTUAL REASON FOR ADVERSE ACTION. IT WAS THE MALICIOUS AND INTENTIONAL VIOLATION OF MY RIGHTS THAT CAUSED ME TO ACT TO INVESTIGATE, DOCUMENT AND RECALL EVENTS DATING TO 1984. AS STATED IN THE ACCOMPANYING AFFADAVIT 1984 IS THE YEAR THAT: THE EDISON TOWNSHIP EDUCATION ASSOCIATION ACTED WITH THE EDISON TOWNSHIP BOARD OF EDUCATION TO OBSTRUCT MY RIGHT TO EMPLOYMENT BY FRAUDULENTLY STATING MY CORRECT POSITION IN SENIORITY. 1984 IS ALSO THE YEAR THAT THE BOARD OF EDUCATION BECAME A MEMBER OF A "INSURANCE RISK POOL" AND HAD A ECONOMIC MOTIVE TO END MY EMPLOYMENT IN CIRCUMSTANCES WHERE I WOULD NOT BE ABLE TO ELECT CONTINUATION OF MY HEALTH CARE BENEFITS. THE INTEREST OF ATTORNEYS PAID BY THE N.J.E.A., THE EDISON TOWNSHIP EDUCATION ASSOCIATION AND THE BOARD OF EDUCATION HAS BEEN FOR THE PAST 2½ YEARS TO CONCEAL THE ACTUAL CAUSE OF THE ADVERSE ACTIONS DATING TO 1984.

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III. DISCRIMINATION STATEMENT

Complainant alleges unlawful discrimination based on his physical handicap/Narcolepsy and Diabetes, in that:

COMPLAINANT ALLEGES UNLAWFUL ECONOMIC DISCRIMINATION BASED ON ACTUAL OR ANTICIPATED INSURANCE COSTS. THAT DISCRIMINATORY ACTS BEGAN IN 1984 BASED ON MY BEING DIAGNOSED AND TREATED FOR CANCER IN 1979. SINCE THAT TIME THE BOARD OF EDUCATION HAS PURSUED A COURSE OF ACTION OF RESPONDING TO MY BEING DIAGNOSED WITH NARCOLEPSY IN JULY OF 1984, AND DIABETES IN 1991 BY MAKING ADDITIONAL MIS REPRESENTATIONS REGARDING MY EMPLOYMENT TO ASSURE THAT IN THE EVENT THAT MY DISABILITIES ENDED MY EMPLOYMENT I WOULD BE UNABLE TO CONTINUE MY HEALTH INSURANCE COVERAGE AT GROUP COST. FOR THE 1992-1993 SCHOOL YEAR THE BOARD OF EDUCATION MADE USE OF A FRAUDULENT SENIORITY LIST ESTABLISHED IN 1984 TO JUSTIFY DENYING ACCOMMODATION TO MY DISABILITIES AS A MEANS OF SUSPENDING ME WITHOUT PAY OR DUE PROCESS. DURING THAT SUSPENSION AND CONTINUING UNTIL APRIL OF 1994 LEGAL REPRESENTATION PROVIDED BY THE NEW JERSEY EDUCATION ASSOCIATION REFUSED TO ASSIST ME IN PROTECTING MY RIGHTS AS A TENURED TEACHER. THERE INTEREST WAS TO PROTECT THE CONSPIRING PARTIES AS STATED IN THE ACCOMPANYING AFFADAVIT DOCUMENTING ACTIONS TAKEN TO OBSTRUCT MY RIGHTS.

A. Complainant alleges that Respondent reduced his free periods, during which he slept, and adjusted his income effective January 14, 1994.

COMPLAINANT ALLEGES THAT RESPONDENTS ACTED WITH THE SPECIFIC INTENT OF DENYING COST FREE ACCOMMODATION TO HIS DISABILITIES AS A MEANS OF COERCING HIM TO END HIS

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EMPLOYMENT IN CIRCUMSTANCES THAT WOULD:

1. CONCEAL DISCRIMINATION AND CONSPIRACY TO OBSTRUCT HIS RIGHTS SINCE 1984.
2. IMPROPERLY SUPPORT THE CLAIM THAT THE LEAVING OF HIS TENURED TEACHING POSITION WAS VOLUNTARY, AND THAT BY MAKING THE FALSE CLAIM OF VOLUNTARY LEAVING HIS RETURN TO EMPLOYMENT WOULD BE DENIED IN EFFECT THE COMPLAINANT WOULD BE DEPRIVED OF HIS SALARY FOR THOSE YEARS FROM THE AGE OF 42 UNTIL THE MANDATORY RETIREMENT AGE OF 70. PREDICATED ON COMPLAINANT'S PRESENT SALARY THE LOSS RESULTING FROM THE RESPONDENT'S ACTIONS WOULD BE IN EXCESS OF $1,736,000^{00}$.
3. DENY RESPONDENT HIS HEALTH BENEFITS INSURANCE POLICY IN THE AMOUNT OF $1,000,000^{00}$ AS A RIGHT OF EMPLOYMENT.
4. DENY RESPONDENT THE RIGHT TO ELECT TO CONTINUE HIS HEALTH CARE BENEFITS AT GROUP COST AS N.J.S.A. 17B:27-51.12. STATES.

THAT THE ACTIONS STATED ABOVE ARE ACTS OF FRAUD AND CONSPIRACY WITH MULTIPLE OBJECTIVES.

B. Complainant alleges that inspite of his condition he satisfactorily performed his duties.

AND HAS DONE SO FOR THE 10 YEARS OF DISCRIMINATION, CONSPIRACY, DENIAL OF DUE PROCESS, HARASSMENT, RETALIATION, MALICIOUS MISUSE OF THE LEGAL PROCESS BY N.J.E.A PAID ATTORNEYS, OBSTRUCTION OF HIS RIGHTS, COERCION, OUTRAGEOUS CONDUCT BY HIS EMPLOYER, THE CREATION AND SUBMISSION OF FRAUDULENT DOCUMENTS, INVASION OF PRIVACY, THREATS OF SLANDER, THREATS OF PHYSICAL HARM, OBSTRUCTION OF HIS

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PRESCRIBED MEDICATION, INVASION OF THE PRIVACY OF HIS HOME BY BURGLARY AND CORRUPTION IN GOVERNMENT AGENCIES.

AND SEE N.J.S.A. 10:5-3 ON PERSONAL HARDSHIPS.

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c. Said acts of discrimination occurred in the County of Middlesex in the State of New Jersey.

5. The Complainant requests whatever relief is provided by law including, but not limited to, compensatory damages for economic loss, humiliation, mental pain, and suffering.

6. The Complainant has not instituted action in any Court, either Criminal or Civil, regarding this matter.

Edward Renaud
Complainant

STATE OF NEW JERSEY )
) SS:
COUNTY OF MERCER )

I, Edward Renaud, of full age, being duly sworn according to law deposes and say; that I am the Complainant herein; that I have read the foregoing complaint and knows the contents thereof; that to the best of my knowledge, information and belief, the facts alleged therein are true.

Edward Renaud.
Complainant

Sworn to and subscribe before me
the 13th day of July 1994.

Notary Public of New Jersey

COMMISSION EXPIRES

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| | | |
|---|---|---|
| EDWARD RENAUD, | : | BEFORE THE COMMISSIONER OF |
| Petitioner, | : | EDUCATION OF NEW JERSEY |
| v. | | |
| BOARD OF EDUCATION OF THE TOWNSHIP OF EDISON MIDDLESEX COUNTY, | : | PETITION |
| THE EDISON TOWNSHIP EDUCATION ASSOCIATION MIDDLESEX COUNTY, | : | |
| Respondents. | : | |

1. FILED IN APRIL OF 1993 REJECTED ON THE ISSUE OF TIMELINESS.

2. THE AFFADAVIT OF JAN. 9, 1995 IS BASED ON THIS COMPLAINT.

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## PRELIMINARY STATEMENT

As Petitioner in this matter I am forced to bring this dispute before the Commissioner without legal representation. I have been represented in this dispute for the past 18 months by attorneys paid by the New Jersey Education Association. During that time I have had no right to file charges, no protection from harassment or retribution. I have made reasonable attempts to hire a attorney and pay for my legal representation. I have spent approximately $1000.00 on phone calls in attempts to locate any assistance in resolving this dispute. I can not find any attorney that will represent me at any cost. In any situation where the payment for my legal representation was discussed with N.J.E.A. paid attorneys I stated that I wanted to end N.J.E.A. paid representation and pay for representation with my funds. This is a situation where I was suspended without pay or due process by the Township of Edison Board of Education from September 1,1992 through October 15, 1993. SEE DOCUMENTS AND ADDENDUMS, PAGE A-1

As Petitioner in this matter state that I am a handicapped individual who is entitled to accommodation to my disabilities. I must request that I be granted relaxation of the rules and regulations regarding timely filing, amendment of petition and hearings. I believe that I can substantiate my position that a serious injustice would result if I am held to the rules of procedure stated in TITLE 6, EDUCATION. My disabilities and the accommodations that are required are accurately stated in letters of September 2, 1992, November 11, 1992 and August 20, 1993 by my neurologist Dr. June M. Fry, Director of the Sleep Disorders Center of the Medical College of Pennsylvania. SEE PAGES A-2,3,4

The primary impact of the disabling neurological disorder narcolepsy is that it severely limits the hours in any day that I can work. I have stated to people that "my clock is off" meaning that I have to sleep at intervals throughout any day and attempt to keep a consistent schedule of naps to achieve the best yield of time that I can function. Like most disabled people I try to lead as normal a life as I can. I can tolerate temporary deviations in my schedule, I can at times extend the time periods that I am awake. I can recognize when I will be over come by sleep. I can can state that the worst possible activity for me is to have to read or write for extended periods. I try to arrange those activities for the periods immediately after I've slept. I have been able to function as a Industrial Arts teacher since 1984. I know that narcolepsy is incurable and over a period of 10 years I have learned to adapt extremely well. If I attempt to be "normal" and avoid sleeping I aggravate the situation and actually lose additional awake time, I experience a backlash of disrupted sleep and other more serious symptoms of narcolepsy that can only be resolved by returning to as regular a schedule as I can maintain. In this dispute my disabilities have proven to be a significant factor in obstructing my rights. SEE PAGES A-5



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Petitioner in this matter requests that the requirement that petitions be typed be relaxed temporarily as an accommodation to my disability. In order to produce a timely filing, I am compelled to write this complaint without legal advice or assistance. My typing skills are limited. I have been subjected to harassment, intimidation, coercion and retaliation for the past ~~24~~ 27 months by the respondents in this matter. They have acted together to aide and abet discrimination to prevent filing of this petition. They have effectively encircled me, affecting every aspect of my life as a handicapped person, they have the resources, personnel and motivation that is far beyond that of any individual. I can no longer endure the hardships, physical and emotional, that have been placed on me for no other purpose than to conceal what has been a ten-year ~~effort~~ conspiracy to violate my rights.

I will make every effort to assure that this filing of petition and further filings in this dispute are properly typed and submitted. I request that this be regarded as a preliminary filing made to assure that I am within the 90 day filing limit.

The 10 year and ongoing violation of my rights has produced a burden of allegations, documents and statements of facts. I have made repeated efforts, starting on September 2, 1992, to file the correct charges in this dispute as I understood them. At every agency or jurisdiction, I have been refused the right to file, lack of jurisdiction claimed, or I was ~~instructed improperly~~ COERCED to drop the



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charges as a matter of procedure by New Jersey Education Association paid attorneys. A substantial effort has been made that no record, affidavit or correct sworn testimony existed. I have acted to investigate, research, support with documents and recall events that have occurred since 1984. This petition contains allegations of criminal and civil violations of law. In repeated instances, I ~~believe that the charge~~ AM MAKING THE COMPLAINT OF conspiracy to obstruct my rights ~~can be supported~~. SEE PAGE A-6 PARAGRAPH 1 AND PAGES A-7 THRU A-19

Petitioner requests that the Commissioner of Education investigate, hear and impose sanctions in this matter. Included in this filing are motions for stays of the Boards actions and an application for emergent relief.

Petitioner, Edward Renaud, residing at 508 Fox Avenue, Belford, New Jersey 07718, hereby requests the Commissioner of Education to consider a controversy which has arisen between Petitioner and respondents whose addresses are 100 Municipal Boulevard, Edison, New Jersey 08817, and 2 Ethel Road, Suite 203-A, Edison, New Jersey 08817, pursuant to the authority of the Commissioner to hear and determine controversies under school law (N.J.S.A. 18A: 6-9), by reason of the following facts:

Allege that in 1984 the Board of Education and the Edison Township Education Association conspired to obstruct my rights under N.J.S.A. 10:5-1 the "Law Against Discrimination" and under



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N.J.S.A. 18A "School Law".

Petitioner alleges that following the enactment of the N.J.S.A. 18A:18B that the Board acted to end my employment and obstruct my rights

In 1979, I was diagnosed with cancer and treated by surgery and radiation treatment and costs of treatment were paid through the Board's medical plan. Prior to the school year, 1984 - 1985, the Board entered into an insurance risk pool. The Board then offered me a 9/10 contract for 1984-1985, which I refused on the advice of Mr. John Coe, who is the Industrial Technology Department Chairperson. He did not explain to me why I should demand a full contract. SEE PAGE A-6. PARAGRAPH 2

This was the beginning of 10 years of actions to reduce my seniority, damage me financially and end my employment by Reduction-in-Force. THE BOARD HAS ACTED IN CONSPIRACY WITH THE EDISON TOWNSHIP EDUCATION ASSOCIATION, AND ATTORNEYS EMPLOYED BY THE N.J.E.A. TO HARASS ME. DAMAGE ME FINANCIALLY, AND SUBJECT ME TO SEVERE EMOTIONAL DISTRESS SINCE SEPTEMBER OF 1992.

Petitioner alleges that actions 1984 to present indicate that Board has invaded my privacy to assess medical risks and violate my rights. SEE PAGE A-20,21,22,23

Petitioner states that in 1984, I was informed by E.T.E.A. Grievance Committee Chairperson, Mr. Lawrence White (retired), that a veteran, Mr. Ralph Ventola would be granted 1 year seniority



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under N.J.S.A. 18[illegible]-12. IN FACT THAT LAW [illegible] NOT ENACTED UNTIL JUNE 27, 1986.

Petitioner alleges that E.T.E.A. representative acted to obstruct my rights under the law by improperly applying N.J.S.A. 18A:28-12 retroactively. IN 1984 A VETERAN. RALPH VENDLA WAS GRANTED 1 YEAR VETERAN'S SENIORITY. IN CONVERSATIONS WITH MR. VENTOLA HE HAS STATED THAT. I BELIEVE AND ALLEGE THAT HE WAS ABLE TO PURCHASE MY SENIORITY BY ACCEPTING 1 YEAR'S VETERAN'S CREDIT ON THE SALARY GUIDE AND FORFEITING 6 MONTHS OF SENIOR CREDIT.

Petitioner alleges that a pattern of actions began to manipulate my seniority: In repeated instances, I was told that seniority in category does not accrue while transferred out of category of certificate. SEE DOCUMENT PAGES A-24 THRU A-49 ON TEACHING ASSIGNMENTS BASED ON THE FRAUDULENT SENIORITY LIST DATING TO 1984. ANNUAL ACTIONS OF THE BOARD AND RELATED ISSUES.

Teachers who lack permanent certification have been given preference in employment, assignments, or allowed to obtain provisional certificates to continue their employment. ALLEGE THAT INDUSTRIAL ART'S TEACHERS. THOMAS SCHOONER, ARTHUR TODT AND POSSIBLY OTHERS ARE NOT HOLDERS OF PERMANENT CERTIFICATES, AND WERE PARTY TO FRAUD AND OBSTRUCTING MY RIGHTS.

Petitioner alleges that the Board has acted with malicious intent to damage me financially and obstruct my purchasing benefits under ~~the COBRA law~~ N.J.S.A. 17B:27-51.12. by reducing me to a part-time teacher.

Following a R.I.F., based on a fraudulent accounting of seniority, I acted to pay for the 18-month period allowed under the "COBRA" law. I contacted the Board office in this regard and was then billed for the amount of $4,200.00. I called protesting this amount having been told in a casual conversation with staff the correct amount was $1,700.00. The response was that I had never returned to single benefit status after a divorce in 1986. I knew



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this to be untrue and stated so. I then made an approximate accounting of my previous years' medical bills resulting in a total of $4,000.00. THERE ARE NO REQUIRED POSTING OF COBRA RIGHTS ERISA RIGHTS. THE "WHISTLE BLOWER ACT" OR "RIGHT TO KNOW" THAT I CAN FIND AT EDISON HIGH SCHOOL.

I allege that for the 1991-1992 year, my proper place in seniority was again fraudulently stated, and I was again subjected to an improper Reduction in Force on April 12, 1991. (See Document A-32.

I received no offer of employment until days prior to the start of school when Mr. Donald Flor, Supervisor of Industrial Arts, called offering me a position as a substitute, which I declined. Mr. Flor called again a week after the start of school and again offered me the same position as a "temporary teacher" from 9/11 through 12/31/91 and stated that I would be a .8 part-time teacher because I was at the bottom of the seniority list. Barring me from employment until 9/11/91 resulted in a loss of pay of $1,547.30. I WAS COERCED IN TO A VIOLATION OF MY RIGHTS AS A TENURED TEACHER BY THIS ACTION. AND SEE LETTER OF SEPT. 13 .199. , SEE PAGE A-33

I allege that by using a fraudulent seniority list and delaying my rehiring until one week after the start of school (SEE PAGE A-86) I had been coerced into accepting the position as a .8 part-time teacher which reduced my pay by $10,672. The action violates 18A:6-10. I ADDRESSED THE ISSUES IN THE TWO ABOVE PARAGRAPHS WITH THE N.J.E.A PAID ATTORNEY MRS. SHARON LYNCH NORTON IN REPEATED INSTANCES AND SPECIFICALLY IN SEPTEMBER OF 1993 AND SHE REPLIED THAT THESE AMOUNTS COULD NOT BE RECOVERED, HER ACTIONS WERE TO CONCEAL THESE ACTS.

Prior to accepting that position, I contacted the Edison



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Township Education Association questioning whether it was correct that my pay be reduced, and received no reply until mid-October. I was then informed that it was correct to reduce my pay because I was at the bottom of the seniority list. I ALSO RAISED THE QUESTION OF MY SENIORITY RIGHTS OUT OF CATEGORY. SPECIFICALLY THAT I WOULD BE ENTITLED TO A POSITION TEACHING "PERSONAL COMPUTER APPLICATIONS") THERE HAD BEEN A PREVIOUS GRIEVANCE ON THIS BY A INDIVIDUAL LESS SENIOR THAN I

Petitioner states that in May of 1991, I became ill. On July 3, 1991, I was diagnosed and treated with oral medication for diabetes. My medical history since 1979 now included cancer, narcolepsy and diabetes. In effect, while seeking appropriate medical treatment, actions to violate my rights have increased in a pattern of discrimination, AGAINST THE HANDICAPPED. I ALLEGE THAT WHILE INVESTIGATING THE ACTIONS TAKEN AGAINST ME I HAVE FOUND THAT ALIKE ACTIONS HAVE BEEN TAKEN AGAINST OTHERS WHO HAVE DISABILITIES OR MIGHT INCUR MEDICAL EXPENSES SUCH AS PREGNANT WOMEN. (PAGE - BOTTOM)

Petitioner alleges that provisions of the E.T.E.A. contract in force from July 1, 1990, can be maliciously and intentionally applied or falsely interpreted so as to have the effect of producing violations of my rights. In this matter, the Board has acted to make malicious use of the contract PAGE A-50. That by barring me from return to employment by September 1, 1991, again by September 1, 1992, and again by September 1, 1993, the Board has acted under Article XXIX, Salary Provisions D-1, they have acted to violate my rights and reduce my salary. The language of "D" employment credit is notably arcane and produces AN incredible array of circumstances that have been employed by the Board to reduce my pay without due process, specifically by barring my return by September 1. ALLEGE THAT THIS METHOD IS COMMONLY USED AGAINST OTHER DISABLED INDIVIDUALS IN EDISON. IN EFFECT INDIVIDUALS WHO INCUR INSURANCE COSTS ARE SUBJECTED TO PAY AND SICK DAY REDUCTIONS TO "PAY" FOR THEIR MEDICAL INSURANCE COSTS.

FROM ABOVE
I WAS TOLD THAT I WAS NOT ENTITLED TO THAT POSITION, AND THAT THEY DIDN'T KNOW ANYTHING ABOUT THE GRIEVANCE.



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Petitioner states that I have never asked for a reduction from a full-time position to accommodate my disabilities. I did not know that I was "handicapped" under the law or had any specific rights until the end of the 1990 school year. Publicity surrounding the enactment of the Americans with Disabilities Act made me aware that I had rights under State of New Jersey and Federal Law. AND PUBLICITY ABOUT NATIONAL HEALTH CARE LED ME TO THE CAUSE OF ADVERSE ACTIONS Until then, I had accommodated my disability working within the circumstances, positions and schedules that I was given. ON DECEMBER 21, 1993 I MET WITH MR. JOHN COE AS DEMANDED BY MARY ANN BANKS, VICE PRINCIPAL. AT THAT MEETING MR. COE STATED THAT I WAS ABLE TO CHOOSE MY OWN SCHEDULE IN OCT. OF 1992 WHICH IS UNTRUE.

Schedules, assignments and teaching positions had, since 1984, (PAGE BOTTOM) been based on my being in last position in seniority. Discussions of my schedule with Mr. John Coe, since 1990, were casual meetings. I was asked if I could work on a proposed schedule and I replied that I would make it work. AND THAT I HAD NO CHOICE BUT TO TRY TO MAKE IT WORK. After 1990, the only request I made of Mr. Coe was that I not be directed to cover classes for absent teachers. The high school schedule provided the two free periods that I needed for an opportunity to sleep. Occasionally, I covered classes when Mr. Coe needed help. It generally had a negative impact on me in that I then required an additional nap or I had to sleep for a much longer period after school.

In the Spring of 1992, Mr. Coe told me that because teachers' schedules would be arranged by computer and not by him, that arranging a schedule that would provide two free periods at the intervals I needed would be increasingly difficult. In casual conversations starting in 1990, I had stated that the middle school

(CON'T. FROM ABOVE.) I HAVE NEVER BEEN ABLE TO CHOOSE MY OWN SCHEDULE. IN 1990 I WAS ASSIGNED TO TEACH DRAFTING. WHEN I QUESTIONED THIS ASSIGNMENT I WAS TOLD THAT "THE MOST SENIOR TEACHER IN THE INDUSTRIAL TECHNOLOGY DEPARTMENT WAS ALLOWED TO CHOOSE HIS OWN SCHEDULE. AS EXPLANATION AS TO WHY ARTHUR TODT WAS ALLOWED TO TEACH WHAT HAD BEEN MY ASSIGNMENT IN METAL SHOP. 9

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schedule had only one free period. It would not allow me to sleep at intervals as the high school schedule did, and it would eventually force me to retire. AND AS I RECALL I HAD ALSO STATED TO MR COE AND MR. FLOR THAT IT WOULD MAKE SENSE TO SCHEDULE MY ASSIGNMENT FIRST TO PROVIDE ACCOMMODATION TO MY DISABILITY, L. MOORE LATER JUSTIFIES SCHEDULING ME LAST ON THE BASIS OF A FRAUDULENT SENIORITY LIST.

Petitioner alleges that the Board then maliciously and intentionally made use of the previously stated fraudulent seniority list to justify a transfer to the Woodrow Wilson Middle School and by that means COERCE ME TO end my employment and conceal the prior 9 years of violations of my rights. The events from 1992 are stated in the following paragraphs. IN 1992 MY DISABILITIES NARCOLEPSY AND DIABETES WERE USED TO DISGUISE THE ACTUAL CAUSE OF THE BOARD'S AND E.T.E.A'S ACTIONS TO OBSTRUCT MY RIGHTS, DISCRIMINATION AND FRAUD DATING TO 1984

Petitioner alleges that the Board, through its agents, Mr. Donald Flor and Lorene Moore, Personnel Director, ACTED to intentionally violate AND OBSTRUCT my rights by transferring me to a middle school teaching position for the 1992-1993 school year A CONSTITUTIONAL "DUE PROCESS" VIOLATION and justifying their actions by a fraudulent seniority list, misstating requirements for any high school position that would be available, making false claims that seniority in position existed, and in effect punitively transfer me to a position where accommodation to my disability would reduce me to a part-time position SEE PAGE A-37. THESE ACTIONS WERE TO MALICIOUSLY AND INTENTIONALLY MISUSE THE LEGAL PROCESS TO OBSTRUCT MY RIGHTS. HERE FRAUD IS THE BASIS FOR CRIMINAL COERCION.

In regard to this discriminatory course of action, Petitioner alleges that on July 7, 1992, Mr. Flor again fraudulently stated my seniority; in a discussion of my return from Reduction-in-Force that Mr. Ralph Ventola would be given preference in rehiring to a High School Industrial Arts teaching position.



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Petitioner alleges that Mr. Flor also misstated the circumstances and dates of retirements of two teachers to justify his actions, SPECIFICALLY JAMES LYNCH AND GEORGE LACKETT.

Petitioner alleges that on or about July 25, 1992, Mr. Flor again stated that I would be assigned to a middle school position to replace George Lackett, who had decided days before to retire. TO MY KNOWLEDGE GEORGE LACKETT HAD SUBMITTED HIS RETIREMENT PAPERS AS EARLY AS JUNE OF 1992., MR. FLOR ALSO STATED THAT THE POSITION WAS 5 PERIODS AND A DUTY, TAKE IT OR LEAVE IT.

Petitioner alleges that in a discussion of my teaching assignment on or about August 3, 1992, I proposed to Mr. Flor a way to accommodate my disability was that he would "fight that".

Petitioner alleges that same discussion I was told by Mr. Flor that my assignment would be to Woodrow Wilson Middle School, 5 periods and a duty period, and if I could not do the job AND PERSUED ACCOMMODATION that the Board would force to me retire, ALLEGE VIOLATION OF N.J.S.A. 2C-33-4 AND THE THREAT OF CRIMINAL COERCION.

On or about August 11, 1992, I receive a letter assigning me to Woodrow Wilson Middle School (SEE PAGE A-37). I replied in a letter of August 13, 1992 SEE PAGE A 38,39. I also called Lorene Moore on August 12, 1992. THIS LETTER WRITTEN BY THE COMPLAINANT WITHOUT COUNSEL IS APPARENTLY A CRITICAL DOCUMENT. IT HAS IN REDACTED INSTANCES DISAPPEARED FROM THE RECORD IN SOME JURISDICTIONS. PARTIES INVOLVED HAVE REFUSED TO READ IT OR MAINTAIN A COPY AND IN NO INSTANCE HAS A N.J.E.A. ATTORNEY BEEN ABLE TO DISCUSS IT.

Petitioner alleges that Lorene Moore, Mr. Donald Flor, and Dr. Joseph Kreskey took a course of action to suspend me without pay or due process A CONSTITUTIONAL VIOLATION. Their actions include harassment, retaliation, ALLEGE CRIMINAL HARRASSMENT N.J.S.A. 2C-33-4 coercion ~~and interference with~~ my rights. They conspired with CRIMINAL AND CONSPIRACY TO OBSTRUCT

individuals and entities who aided and abetted THAT CONSPIRACY discrimination to obstruct my rights, AND HARASS ME. ALLEGE VIOLATION OF N.J.SA. 2C-33-4, d

They engaged in a malicious AND INTENTIONAL VIOLATION OF MY RIGHTS under the Americans with Disabilities Act, a law that afforded them a measure of protection because it would not cover acts of discrimination prior to July 26, 1992, AND WAS IN THIS INSTANCE USED MALICIOUSLY TO CONCEAL FRAUD AND CONSPIRACY. IT ALSO PROVIDES EXPLANATION AS TO WHY MRS. NORTON, MR. KLAUSNER, AND MR. CAVANAGH REFERRED THE E.E.O.C. TO THE D.L.R. THROUGHOUT I WAS ADVISED AGENCY DUE PROCESS AT THE E.E.O.C. AND THE JUSTICE DEPT.

Petitioner alleges that the following actions were taken to violate my rights. I was suspended without pay or due process from September 1, 1992, until October 15, 1993, returning to work on that date, AND AS A PART OF HARASSMENT my pay was withheld until November 9, 1993. I was then paid retroactively from September 1, 1993. AGAIN ALLEGE HARASSMENT UNDER N.J.SA. 2C:33-4 (d). AT THAT TIME N.J.E.A. PAID ATTORNEYS TOOK NO ACTION TO PROTECT MY RIGHTS UNDER SCHOOL LAW, THE L.A.D. OR THE A.D.A.

Lorene Moore, in reply to a phone call of August 12, 1992, made the threat of a malicious misuse of the legal process AND INTIMIDATION. She claimed to be fully trained in the A.D.A. Law; that I would have to sue to obtain my rights; SHE USED A FRAUDULENT SENIORITY LIST to justify my being transferred to a position as a substitute, AND STATED that rehiring me from R.I.F. was accommodation to my disabilities, and claimed she had no record of my disability. See my reply PAGE 5039. ALLEGE CRIMINAL HARASSMENT, N.J.SA. 2C:33-4. AND CONSPIRACY TO OBSTRUCT MY RIGHTS UNDER THE A.D.A, THE N.J. L.A.D. AND TITLE VII, SCHOOL LAW.

No mediation of accommodation has ever been allowed prior to the start of school. I attended the first day of school faculty meeting at the middle school. The Principal, Mr. Gabrielson, stated that he could not arrange any accommodation without the



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Superintendent's approval. In calling him later, on that day, I stated that my Neurologist, Dr. Fry, insisted that I not work without accommodation to my disabilities SEE PAGES A 51, 52, 53, and that I would hold the Board responsible for all days I missed while I was not reasonably accommodated. MR. GABRIELSON HAD ASKED WHETHER I I WOULD BE TAKING SICK OR PERSONEL DAYS MY REPLY WAS THAT IT WAS NOT MY CHOICE NOT TO WORK,

Petitioner alleges that the position that was vacated by a punitive transfer was divided between two teachers who do not have permanent certification, and in effect, no seniority. MS. LORRAINE MOORE STATED THAT THESE INDIVIDUALS HAD SENIORITY IN POSITION. WHICH CAN NOT BE SUPPORTED IN LAW, AND HER STATEMENT IS BASED ON A FRAUDULENT SENIORITY LIST.

Petitioner alleges that the process of attempting to return to employment, mediate accommodation, AND obtain a means of sustaining myself financially ~~become the means of harassing me~~ I HAVE BEEN SUBJECTED TO CRIMINAL HARRASSMENT AND BY THAT MEANS THE N.J.E.A. PAID ATTORNEYS HAVE ATTEMPTED TO FORCE ME TO RETIRE, AND CONCERK CRIMINAL CONSPIRACY AND FRAUD DATING TO 1984.

I allege that in a conversation regarding the meeting cancelled on August 28, 1992, with John Gundry at the E.T.E.A. office in Edison, NJ, he conveyed or originated what I now recognize to be a veiled threat of slander. Following a telephone call to Lorene Moore, John Gundry stated to me, "Lorene Moore wanted me to ask you your opinion on this, "What if a male teacher was H.I.V. positive and the School Board told the people in the school about it so they could protect themselves, and then they had to get rid of that teacher because it was too disruptive for him to be in the school?" ALLEGE VIOLATION OF 2C:33-4 (d) N.J.S.A. I LATER DISCUSSED THIS SPECIFIC INCIDENT WITH MRS. NORTON STATING THAT IT WOULD CREATE THE IDEAL SITUATION FOR EDISON. I WAS FOR 1992 ASSIGNED TO A NEW SCHOOL. KNEW NO ONE ON THE FACULTY WELL, EVEN CLOSE FRIENDS WOULD I BE (PAGE BOTTOM)

My reply was that I had not read that portion of Title A in the UNLIKELY TO ASK SOMEONE IF THEY WERE H.I.V. POSITIVE; EDISON'S ACTIONS FIT PERFECTLY. I HAD ATTENDED THE OPENING FACULTY MEETING AND THEN "DISAPPEARED" EDISON WOULD HAVE OPPORTUNITY TO SPREAD ANY RUMOR THEY WANTED. I ALSO EXPLAINED THAT SOME OF MY SYMPTOMS COULD BE MISTAKEN FOR THOSE OF A.I.D.S.. I ALSO TOLD HER THAT NARCOLEPSY WAS OFTEN MISUNDERSTOOD. (13)

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Americans with Disabilities Act; that I was not H.I.V. positive or in any of the known risk categories. I also stated that I thought that kind of action to be illegal; that it was typical of the kind of thing that Edison would do to a teacher and that I had heard that rumor spread about ~~another teacher~~ A NURSE WHO HAD DIED. This veiled threat of slander is a violation of N.J.S.A. 10:5-12 subsection d. AND N.J.S.A. 2C:33-4 IN RECALLING THIS EVENT: IT WAS FOLLOW VENTOLA WHO HAD TOLD ME THAT THE NURSE MARINE HALEM HAD DIED. HE TOLD ME THAT THE RUMOR WAS BEING CIRCULATED THAT SHE HAD DIED OF AIDS, AND THAT PEOPLE WERE

Petitioner alleges that in a letter of September 15, 1992, (PAGE BUTTON) (1) Lorene Moore attempts to coerce me into accepting a violation of my rights under N.J.S.A. 18A:16-10; that my schedule ~~was~~ HAD TO BE predicated on my disability limitations. This schedule is fraudulent, it does not represent the true and correct schedule, combines periods 5 & 6 as a teaching period to create the appearance that I would be teaching a 4 period part-time schedule SEE PAGE A-42). ALLEGE VIOLATION OF N.J.S.A. 2C 33-4 (d) AND THAT THIS WHOLE MATTER IS BASED ON FRAUD AND A FRAUD CARRIED OUT THROUGH THE U.S. MAIL, A FRAUD AS PART OF A CONSPIRACY TO OBSTRUCT MY RIGHTS.

On or about September 5, 1992, I was first able to establish contact with the attorney, Stephen Klausner, who was assigned by Michael Parise, Middlesex County Uniserve Representative for the N.J.E.A.

Petitioner alleges that the N.J.E.A. paid attorney, Stephen Klausner, sought to cause delay to obstruct my rights, misinformed me of my rights and refused to respond in any letter or document to Lorene Moore's attempts to coerce me into accepting violations of my rights. ALLEGE HARASSMENT, N.J.S.A. 2C:33-4 IN THAT HE CLAIMED TO HAVE RECEIVED ONLY 3 PAGES OF A 22 PAGE CONFIRMED FAX TRANSMISSION OF SEPT. 10. 1992 WHEN I CALLED HIM FOR ASSISTANCE. IN REPLYING TO L. MOORE'S LETTER OF SEPT. 15. 1992. AS I RECALL I WAS UNABLE TO TO ESTABLISH CONTACT WITH HIM FOR WEEKS UNTIL OCTOBER WHEN I DROVE TO SOMERVILLE TO DELIVER A COPY OF THE NARRATION OF EVENTS UNTIL THAT TIME. THROUGH THE MONTHS OF SEPT AND OCT. 1992 MR. KLAUSNER BLAMED THE BOARD'S ATTORNEY FOR DELAY.



(1) AFRAID THAT PEOPLE WITH AIDS WOULD USE UP ALL OF THE HEALTH INSURANCE FUNDS.

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Petitioner alleges that during this time, September 1992, an unidentified agent of the Board misused their telephone "Caller I.D." system to obtain my "Personal Identification Number". They then used that as an instrument of harassment and violated federal law in their actions.

In a conversation early in September, I stated to Mr. John Gundry, E.T.E.A. President, that I was charging calls so as to provide a record that I was acting diligently to attempt to overcome Lorene Moore's actions to obstruct my returning to work. I also made that statement to Stephen Klausner, N.J.E.A.'s attorney. As a following event, I called the Board to speak to Lorene Moore and was informed that she was unavailable and to call back at a specific time. AS I RECALL 2PM. I followed that instruction and was informed by an operator that my P.I.N. number did not enter properly. I gave them the four digit number and was then connected to a secretary who told me that Lorene Moore was not available. I was later contacted by the phone company regarding a bill of credit card calls over $700.00. COMPLAINANT ALLEGES THAT THE BOARD ENGAGED IN HARASSMENT AND ATTEMPTED TO DAMAGE MY CREDIT BY THIS ACT IN CIRCUMSTANCES WHERE I HAD BEEN SUSPENDED WITHOUT PAY OR DUE PROCESS AND THAT THE BOARD HAD CONSPIRED WITH ADJUDICATIVE PARTIES TO DENY ME ANY INCOME.

Petitioner states that I have investigated this incident as to circumstance, events, dates of calls, the viability of this method of obtaining a PIN number by this method. There is no charge on my phone bill for these calls because I had not put them on my credit card but dialed direct from my mother's phone, and Petitioner can further substantiate this allegation. AGAIN, VIOLATION OF N.J.S.A 2C:33-4 (d) AND I BELIEVE THIS IS A VIOLATION OF FEDERAL LAW.

AND IN INVESTIGATING THIS MATTER I FOUND THAT I COULD NOT DUPLICATE THE SITUATION WHERE USING A PHONE CREDIT CARD WOULD CONNECT A CALLER TO A LIVE OPERATOR. IN EVERY INSTANCE A RECORDED MESSAGE IS PLAYED WHEN I CALLED FROM A PRIVATE PHONE. THIS HAS BEEN CONFIRMED BY PHONE COMPANY REPRESENTATIVES.



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I allege that Lorene Moore, Personnel Director for the Edison Township Board of Education acted or instructed others to invade my privacy. AND AS STATED ELSEWHERE THE BOARD HAS SINCE 1984 INVADED MY PRIVACY WITH THE INTENT OF OBSTRUCTING MY RIGHTS. THERE REMAINS A UN-INVESTIGATED ALLEGATION OF WIRE TAPING. IN REPEATED INSTANCES THERE HAVE BEEN UNUSUAL And state: OCCURRANCES WHERE I HAVE BEEN UNABLE TO REACH INDIVIDUALS AND ENTITIES. ANSWERING MESSAGES HAVE BEEN TAMPERED WITH, AND AGENCIES REFUSED TO DISCUSS ISSUES ON THE PHONE BUT WOULD DO SO IN PERSON.

That on or about September 9, 1992, an individual who identified themselves as being from the School Board called my Neurologist, Dr. June Fry, at the Medical College of Pennsylvania, made inquiries regarding my disability without my knowledge or consent.

That Lorene Moore states in sworn testimony at an Unemployment Appeal Hearing on December 4, 1992, Ms. Moore states in reply TO QUESTIONS ON HER ACTIONS TO INVADE MY PRIVACY that it is "Board Policy" to obtain medical files or contact his physician" and when asked "Did you have a signed medical authorization?" again states "Board Policy" and repeatedly refuses to make any other answer to that question. I ALSO BROUGHT THIS TO MR. CAVANAGH'S ATTENTION IN A MEETING ATTENDED BY MRS. NORTON. HIS REPLY WAS THAT "BOARDS DO THIS ALL THE TIME." (MARCH, 1993)

That Dr. June Fry called me on September 12, 1992, and informed me that someone from the Board of Education had called her and made unauthorized inquiries . At a later date, I asked Dr. Fry whether Dr. DeCastro was the individual who had called her on that date and she replied; No doctor or other authorized medical person made that call, I remember that call, but I am certain that no doctor called .

I further allege that Lorene Moore's letter to Dr. DeCastro of



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September 9, 1992, is a forgery; that Mr. Klausner, Lorene Moore and Mr. Uhlig of DSU Associates all knew that document was a forgery (SEE PAGE A-64); and that Mr. Uhlig and Ms. Moore resist entering that document into the record and answering questions about that document to avoid disclosing an invasion of my privacy on or about September 9, 1992. TRANSCRIPTS OF UNEMPLOYMENT HEARING OF DEC. 4. SUPPORT MY STATEMENT AND I FURTHER ALLEGE THAT MR. UHLIG AND THE N.J.EA. ATTORNEY STEPHEN KLAUSNER SUBORN PERJURY AT THAT HEARING.

I allege that Mr. Donald Flor, Supervisor of Industrial Arts, stated to Mr. John Gundry in a casual encounter at the Edison Municipal Complex, that the Board of Education would look into my medical records to find a way of getting rid of me. This threat was relayed to me on September 14 or 16, 1992, in a telephone call from Mr. Gundry. AGAIN ALLEGE CRIMINAL VIOLATION OF N.J.S.A. 2C:33-4

Petitioner further alleges that the Middletown Pharmacy, Main Street, Belford, NJ 07718, then acted to aide and abet discrimination and cause me physical harm by discontinuing my prescription medication. IN THEIR ACTIONS THEY CONSPIRED TO OBSTRUCT MY RIGHTS AND CARRY OUT THE THREAT MADE BY MR. FLOR RELATED TO ME BY MR. JOHN GUNDRY. AS STATED HERE.

I submitted a prescription for 120 tablets of Desoxyn on September 22, 1992, and was given a partial filling of 36 tablets, (SEE PAGE A-55 TOP). Lorene Moore's letter of October 15, 1992, DEMONSTRATES INTENT. VIOLATES BOARD POLICY AND "TITLE 18A" AND carries out the threat of invasion of privacy, uses my medical records to carry out the threat to get rid of me and specifically documents a suspension without pay or due process. IN DOCUMENT #10 VIOLATES N.J.S.A. 18A:16-3 IN HER DEMAND THAT I BE EXAMINED BY THE BOARD DOCTOR. THE ILLEGAL DEMAND CORRESPONDS WITH THE DISAPPEARANCE OF THE MEDICATION I TAKE FOR NARCOLEPSY. AGAIN CRIMINAL CONSPIRACY TO OBSTRUCT IS DOCUMENTED.



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Petitioner submits the following as documents; partial filling receipt, an additional prescription I obtained in an attempt to continue my medication and a year end accounting of prescriptions for insurance purposes These are to be considered in light of the following: I had to return to Middletown Pharmacy to obtain the "partial filling receipt", they had not provided one as is usual. The Board had not replaced my expired prescription card, linking me to this pharmacy. The medication Desoxyn remained unavailable through Middletown Pharmacy through the following year. Desoxyn was and is continuously available elsewhere and I have receive it by mail without serious interruption within weeks after it became unavailable to Middletown Pharmacy. IN ATTEMPT TO OBTAIN THE MEDICATION DESOXYN I OBTAINED A PRESCRIPTION FROM DR. FRY A BROUGHT THAT TO THE MIDDLETOWN PHARMACY. WHICH THEY DID NOT FILL. I ALSO ATTEMPTED TO HAVE IT FILLED AT 2 OTHER PHARMACIES, THEY CLAIMED THAT THEY DIDN'T HAVE DESOXYN. (SEE PAGE BOTTOM)

That I was able to circumvent this action to withhold my medication by having my Neurologist, Dr. June Fry, switch me to the more easily obtained medication Ritalin ~~for 6 days until October 13, 1992~~. TEMPORARILY, THEN LATER MAKING ARRANGEMENTS THRU THE MEDICAL COLLEGE OF P.A. ~~Since that date~~, I have received the medication Desoxyn by mail, incurring the additional cost of $3.00 for postage and with short interruptions caused by mailing delays.

That I have made repeated inquiries of the Pharmacists at Middletown Pharmacy at intervals of the months from October 15, 1992, through November 23rd of 1993 and received the same reply each time; that Desoxyn is unavailable to them.

IN INVESTIGATING THIS MATTER I SPOKE TO TWO ADDITIONAL PHARMACIES. WHO STATED TO ME THAT IF A INDIVIDUAL WENT TO A PHARMACY WITH A OUT OF STATE PRESCRIPTION, WITH NO PRESCRIPTION CARD AND WAS NOT A CUSTOMER THEY KNEW IT WOULD BE LIKELY THAT A PHARMACY WOULD NOT FILL THE PRESCRIPTION CLAIMING THAT THEY DID NOT HAVE THE MEDICATION. (NOTABLY CLARK DRUGS HAD MARKED "N.K.A" ON THE PRESCRIPTION, NO KNOWN ADDRESS) DEMONSTRATING A SPECIFIC INTENT TO ASSURE THAT MY MEDICATION WOULD BE UNAVAILABLE.



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SEPT. OF 1992:-

That in [redacted], Mr. Donald Flor, Supervisor of Industrial Arts, demanded that I provide a letter stating that I was cleared by my Neurologist to continue working, (A) which I provided, SEE PAGE A-67 1. When I attempted to purchase my next prescription for Narcolepsy at Middletown Pharmacy, I was told Dexedrine had become unavailable and that there was no reason to take my prescription and prescription benefit card to other drug stores because they had already checked and there was not any in the county.

(A) LORENE MOORE CLAIMED THAT THIS [illegible] DID NOT EXIST. AT A UNEMPLOYMENT HEARING OF DEC. 4, 1992 THIS LETTER IS SUBMITTED BY THE BOARD'S REPRESENTATIVES.

In 9 years, I have experienced only 2 instances when prescription medications I take for Narcolepsy have become unavailable, each period of interruption immediately followed requests from the Administrators for the Edison Board of Education for letters regarding my disability. AGAIN ALLEGE CONSPIRACY AND N.J.S.A. 2C:5B-4 (a) HAVE BEEN VIOLATED. THE BOARD HAD REPEATED A SPECIFIC ACT OF CONSPIRACY WITH THE SAME INTENT OF ENGAGING IN CRIMINAL ACTIVITY TO END MY EMPLOYMENT.

Petitioner states that Lorene Moore's letter of October 15, 1992, precipitated a long delayed meeting with Petitioner, Dr. Joseph Kreskey, Lorene Moore, Mr. John Gundry, E.T.E.A. President and Stephen Klausner, N.J.E.A. paid attorney on October 29, 1992. As a result of that meeting, I was coerced into an ILLEGAL AND UNWARRANTED examination by Dr. Villanueva DeCastro on Mr. Klausner's advice to me that the Board had the right to have me examined, HE added the demand that I supply a copy of my medical records TO ASSIST THE BOARD IN ITS HARASSMENT AND INVASION OF PRIVACY. Requests for my pay from September 1, 1992, were denied. Ms. Moore claimed she did not know I did not have a valid PRESCRIPTION insurance card. Mr. Klausner had instructed me not to speak at this meeting; when I disregarded his instruction AND MAINTAINED THAT POSITION THRU APRIL OF 1993



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and questioned Lorene Moore on the logic of having an unqualified doctor examine me. Mr. Klausner insisted that I leave the meeting temporarily. The meeting ended without my being allowed to return. After the meeting, Mr. Klausner informed me that he would be sent my prescription/insurance cards. I did not receive them until December of 1993.

Petitioner alleges that Board agents, Dr. Joseph Kreskey and Lorene Moore acted in discrimination and conspired to continue violations of my rights that had begun in 1984. Mr. Stephen Klausner and John Gundry acted to aid, and abet, the obstruction of my rights.

Petitioner states that I fulfilled the unwarranted demand for my medical records, and acted diligently to return to work. As a response to my efforts:

Dr. DeCastro and parties in her employ acted to cause delay by refusing to return phone calls made to her answering service and office, in one instance the receptionist told me there was no one there.

In a fifth call of October 30, 1992, to the office of Dr. DeCastro, I made an appointment without giving my name or identifying myself as an Edison Board of Education employee and was given an appointment two days later.

I arrived on time for that appointment at 4:30 p.m. on November 5, 1992. That all other patients were examined ahead of me including a patient with the appointment time of 5:00 p.m. and I was seen as her last patient with no one else present in the office. AND STATE THAT THIS "PROCEDURE" OF DEMANDING UNWARRANTED MEDICAL EXAMINATION HAS BEEN USED AGAINST AT LEAST TWO OTHER EMPLOYEES OF THE BOARD OF EDUCATION THAT I AM AWARE OF, AND THE SAME "SCHEDULING" USED IN ONE OTHER INCIDENT.

That Dr. DeCastro's first and unusual question to me was "Why don't you retire?" This question was asked without her examining the medical records that Mr. Stephen Klausner, attorney, demanded I deliver at this examination and without Dr. DeCastro having ever made contact with Dr. Fry. Lorene Moore claims in her sworn testimony of December 4, 1992, that her contact with this doctor was to send her letters from Dr. Fry of September 2, 1992, and Lorene Moore's letter of September 9, 1992. NOTABLY THE QUESTION OF "WHY DON'T YOU RETIRE?" WAS ALSO ADDRESSED TO ME ON DEC. 4. 1992 BY MR. KLAUSNER, AGAIN AS "WHY DO YOU WANT TO GO BACK THERE?" BY MRS. MASON IN DISCUSSING MY RETURN TO EMPLOYMENT FOR 1993-1994 (SEE PAGE BOTTOM)

That Dr. DeCastro did in fact examined me on that date and asked "How do you keep yourself in such good physical condition?" I replied that "I work very hard at whatever I do". She then complimented me on my fitness.

That following the examination, she asked why I was not working. My reply was that she would have to ask the Edison School Board why, I was both able and willing to work with accommodation, but it had been denied to me.

Dr. DeCastro then stated that she knew nothing about sleep

THAT IN EACH CASE MY REPLY WAS THE SAME, THAT THIS WAS ABOUT MY RIGHT TO WORK AS A HANDICAPPED PERSON AND THAT I HAD NO INTENTION OR INTEREST IN RETIRING.



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disorders, that I would have to be examined by Dr. Rehman, who was a Neurologist with expertise in that area, but she did not know his phone number. I HAVE IN MY FILES A DOCUMENT NOT SUBMITTED HERE THAT INDICATES THAT L. MOORE HAD MADE A APPOINTMENT WITH DR. RIEMAN (REHMAN) FOR THE DAY AFTER I WAS EXAMINED. IT WOULD APPEAR TO INDICATE THAT A IMPROPER AND PRIOR ARRANGEMENT WAS BEING MADE, AS HAD BEEN DONE WITH DR. DE CASTRO. (SEE PAGE A-58)

That the day following this examination, I was called and given the name Dr. Rieman. That in later correspondence, I state that I had the incorrect spelling and no phone number. In writing these allegations I found a phone number with no name that may in fact be the number of Dr. Rehman, but it is of little consequence in view of the whole of this matter. IN A TELEPHONE CALL OF NOV. 12, 1992 LORENE MOORE STATED THAT SHE WOULD CALL ME WHEN MY RECORDS WERE TRANSFERRED TO DR REHMAN, SHE ALSO THREATENED TO DISCONTINUE MY MEDICAL BENEFITS BY SENDING A "COBRA LETTER". CITE N.J.S.A. 2C:33-4 (d)

To my knowledge, Dr. DeCastro has not issued any finding to this day or responded to my letter of JANUARY 14, 1993 (

AGAIN ALLEGE CRIMINAL HARASSMENT N.J.S.A. 2C 33-4 (d) AND CONSPIRACY TO OBSTRUCT MY RIGHTS UNDER TITLE 18 A "SCHOOL LAW".

I allege that the Edison Township Board of Education violated N.J.S.A. 18A:6-10, in acting to suspend me without pay from the date of September 1, 1992, through October 15, 1993, and did so due process. My paycheck for this period of September 1, 1992, through September 15, 1992, was issued, delivered to Edison High School and never placed in my possession. Funds in the amount of $370 were deducted from that paycheck and deposited in my annuity account with the Variable Annuity Life Insurance Company (VALIC) (SEE PAGE A-59). These funds were fraudulently removed from my account by the instructions of an unidentified individual SEE PAGE A-60

AND N.J.S.A. 2C:33-4 (d) AND GENERALLY OBSTRUCTED MY RIGHTS TO OBSTRUCT MY RIGHTS

The Edison Township School Board actions in failing to deliver this paycheck to me while I was suspended without pay or

the process support the criminal charge of Theft by Withholding, THIS CONSPIRACY TO DEPRIVE MY RIGHTS.
A The removal of my funds supports the charge of Criminal Fraud and is under federal law a Securities Fraud. The Private subsidiary of the American General Corporation, VALIC acted to conceal this fraudulent withdrawal.

I state the following facts:

That the secretary, Selma Young, in the main office of Edison High School, has stated that she saw my paycheck in the delivery of checks for September 1, 1992 to September 15, 1992.

That Ralph Ventola, a fellow teacher, made a phone call to me following the issuance of paychecks on September 14, 1992, and inquired whether my paycheck had been delivered to me and stated that the secretaries in the office had asked him where I was so that my paycheck could be sent to me. AT A LATER DATE MR. VENTOLA STATED TO ME THAT HE DID NOT RECALL THIS INCIDENT.

I received my THIRD QUARTER VALIC statement in October of 1992 noted that it confirmed the previously stated information and that my paycheck had been issued but never delivered to me. On December 7, 1992, I called "VALIC" to check the status of my account and was informed by a representative that there had been no transactions on my account since the close of the second quarter on June 30, 1992.

On December 8, 1992, I called John Gundry, E.T.E.A. President, regarding Edison's handling of my paycheck. He said he would look

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into this by calling Daniel P. Michaud, the Business Administrator/Board Secretary for Edison. In a return call, John Gundry stated to me that Mr. Michaud told him there were no payroll records under my name. I replied that could not be correct, that my VALIC statement for the third quarter clearly stated that a deposit had been made effective September 14, 1992. John Gundry then offered to call Peggy McManus, Edison Payroll Supervisor; in Mr. Gundry's return call, he informed me that Ms. McManus had examined the check register and that my paycheck had been voided. I HAD ALSO INFORMED MR. GUNDRY THAT MY PAYCHECK HAD GONE TO EDISON HIGH SCHOOL. THAT THE SECRETARIES HAD INQUIRED OF RALPH VENTOLA AS TO WHERE I WAS SO THAT THEN COULD BE SURE I RECEIVED MY CHECK.

I called "VALIC" again on December 10, 1992, and spoke to a representative named Kelly who stated that there had been no transactions on my account since June 30, 1992. I explained the situation as I understood it at that time that Edison was attempting to force me out of my teaching position because I was handicapped. Kelly then volunteered to search the computer records. I called Kelly later in the day who informed me that Edison had removed my money from my account. I requested that she "print-out" that information and send it to me. She then transferred me to her supervisor, Lori A. Chesnowski, who resisted my request for a confirmation of that transaction. She repeatedly stated that Edison had deposited the funds in error, that if I did not have a check or check stub, then no transaction had taken place. I replied that when someone steals your paycheck, they generally don't issue you the pay stub. She stated that there was no reason to put Edison's actions in writing, that my fourth

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quarter statement would show that the money had been removed. I replied that I was upset with VALIC for allowing Edison to remove my funds and that I would inquire at the teachers Christmas party as to whether others had withdrawals made without their knowledge or consent. I asked Ms. Chesnowski to identify the individual who authorized this withdrawal and she declined.

Ms. Chesnowski apparently reconsidered the issues and sent the letter of December 10, 1992 (SEE PAGE A-60).

That in two subsequent discussions of this issue, the VALIC account representative, Barry Brown, was generally acknowledged that this transaction is a serious problem. His position has been that issuance of the fourth quarter statement fulfilled VALIC's responsibility to me. In response, I have questioned why these transactions on my account were not acknowledged in my two inquiries; why this transaction was not confirmed by mail in five days as was their practice in two transactions that I had made in previous years. ON APRIL 18, 1994 DANIEL MACHADO IN HIS POSITION AS THE BOARD'S BUSINESS ADMINISTRATOR REFUSED TO SIGN THE DOCUMENTS TO ALLOW ME TO TRANSFER MY FUNDS OUT OF THE VALIC ANNUITY. BARRY BROWN WAS PARTY TO THIS THEFT BY WITHOLDING, AND AS A FOLLOWING ACT ATTEMPTED TO COERCE ME TO CLOSE MY ACCOUNT AND ACCEPT A REARRANGEMENT ACCOUNTING OF MY FUNDS.

That upon my ending representations by the New Jersey Education Association paid attorney, Stephen Klausner, I traveled to his office in Somerville, NJ, to pick up my file.. When I examined my file, I found that he had failed to include the copy of the documents from VALIC. I replaced the missing fax with copies from my file and delivered it to the attorney, Mr. Thomas W.



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Cavanugh, Jr., who with his associate, Mrs. Sharon Lynch Norton, have provided legal representation paid for by the N.J.E.A. since my case was transferred to them through Mr. John Warms of the N.J.E.A. at my request. THERE DOES EXIST A POSSIBILITY THAT THE EIE.A. MAY HAVE BEEN PAYING ATTORNEYS DIRECTLY TO OBSTRUCT MY RIGHTS. IN ONE INSTANCE MRS. NORTON STATED THAT SHE HAD SENT A STATEMENT OF COSTS TO JOHN GUNDRY, E.J.E.A. PRESIDENT AND LATER MR. CAVANAGH SPOKE DIRECTLY TO MR GUNDRY (PAGE BEFORE)

The N.J.E.A. paid attorneys representing until the present have allowed no further discussion, affidavits or sworn testimony to exist regarding this issue. Mrs. Norton did make mention of it at a meeting with the representative of the Edison School Boards, Ms. Moore, Donald Flor, Dr. Joseph Kreskey and their attorney, Mr. Firenczi. Mention was in the context of "questionable transactions". Following that meeting, Mrs. Norton admonished me not to talk about what had been discussed. ALTHOUGH IN MRS. NORTON'S OPINION A FRAUDULENT TRANSACTION AND CRIMINAL VIOLATION WAS MERELY QUESTIONABLE.

I further allege the Edison Board of Education had suspended me without pay or due process, fraudulently withdrew my funds from my annuity account with VALIC and closed my account without my knowledge or permission. Their actions indicate that they had no intent of returning me to employment so as to conceal criminal fraud in their accounting of seniority and discriminate against a handicapped individual so as to reduce their direct cost of medical benefits. AS OF SEPT. 30, 1992

Petitioner states that following the December 8, 1992, discussion of potential criminal charges regarding the removal of funds from my annuity, my home was burglarized. Following the WITH THE N.J.E.A. PAID ATTORNEY LAWRENCE J. VANWESS WHO SUBSTITUTED FOR MR. KLAUSNER IN DAYS

REGARDING THE ANTICIPATED ACTIONS AGAINST EDISON'S BOARD OF ED. 26
MR. CAVANAGH'S CONVERSATION WAS IN THE CONTEXT THAT THEY HAD FULFILLED THEIR RESPONSIBILITY BY RETURNING ME TO EMPLOYMENT. IN EFFECT. THAT MY FINANCIAL DAMAGES. AND CLAIMS AGAINST THE OTHERS WERE NOT THEIR RESPONSIBILITY.

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burglary, I was reviewing and reorganizing my files, I did not at this time understand what information I needed or wanted. I reacted out of a general concern AS TO WHY my rights were being violated. It was intentional and could not be reasonably motivated by a question of my fitness to teach. Within days of December 11, 1993, I realized that at least two files were missing; a file labelled VALIC and one with a label indicating that it contained my employment related health insurance benefits. I had some understanding of the VALIC file's importance, the insurance file's importance puzzled me for more than a year. It would have contained the 3 page speed gram billing me for $4,200 for $1,700 worth of benefits in August of 1991, BUSINESS FORM SENT BY THE BOARD. ON MY REQUEST AND THE STATEMENT REQUIRED BY STATE INSURANCE LAW, THAT IN THE CASE OF A DISABILITY RETIREMENT THAT A INDIVIDUAL MAY ELECT TO CONTINUE THEIR HEALTH BENEFITS INDEFINITELY AT GROUP COST.

As Petitioner, I include documents that are related correspondence. When it became apparent that the N.J.E.A. paid attorney, Mr. Klausner, was refusing to create any record in writing, I responded on my own. I defended myself as well as I could. The N.J.E.A. attorneys representing me have regularly failed to act or react to my supplying them evidence of civil and criminal violations AND APPARENTLY HAVE HAD COMPLAINTS I FILED REMOVED. As a result of their inaction, I have additional correspondence to submit in further amendments or investigation. Following documents are self explanatory:

| | | |
|---|---|---|
| E. Renaud to L. Moore | Jan. 14, 1993 | PAGE A-61 |
| E. Renaud to Dr. DeCastro | Jan. 14, 1993 | PAGE A-62 |
| L. Moore to E. Renaud | Jan. 22, 1993 | PAGE A-63,64 |



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E. Renaud to L. Moore Feb. 3, 1993 PAGE A-65, 66, 67

L. Moore to E. Renaud Feb. 9, 1993 PAGE A-68

E. Renaud to L. Moore Feb. 26, 1993 PAGE A

Petitioner alleges that the New Jersey Department of Labor acted to aide and abet discrimination by withholding state and federal benefits, denying me the right to due process and altering sworn testimony made before Hearing Officer, Ronald Gitter, on December 4, 1992. DOCUMENTS IN MY POSSESION INDICATE THAT THE N.J. DEPT. OF LABOR WAS A CONSPIRING PARTY. RECORDS OF A CLAIMS INTERVIEW OF 7/17/92 WERE DISPOSED OF AND A CLAIMS INTERVIEW OF 10/28/92 ARRANGED TO PRODUCE FINDINGS THAT I WAS INELIGABLE FOR BENEFITS BECAUSE I WAS HANDICAPPED AND "UNAVAILABLE FOR WORK"

The tapes I received of the December 4, 1992, hearing have been edited to move a specific act of perjury from its correct position in that tape to a context in a later part of the tape where it is no longer perjury. I reported this criminal violation IN MARCH OF 1993 to the attorneys, Mrs. Sharon Lynch Norton and Mr. Thomas Cavanagh, who have represented me through the N.J.E.A. since January of 1993. I have also informed them that I could detect the editing. They have declined to discuss the issue beyond Mr. Cavanagh's statement that the tapes are usually correct.

Petitioner further alleges that questions by Mr. Klausner and Lorene Moore's answers were in instances specific and malicious efforts to damage me. Their purpose was to conceal a conspiracy to obstruct my rights that began in 1984. The ongoing series of appeals by Edison is a malicious use of process. AS A CONSPIRING PARTY THE N.J. DEPT. OF LABOR HAS REPEATEDLY SCHEDULED HEARINGS AS A MEANS OF HARASSMENT. AS OF 11/21/94 THERE WAS A HEARING ON THE ISSUE OF "AVAILABILITY FOR WORK" WHERE HEARING OFFICER R. GITTER INSISTED ON HEARING ON THE ISSUE "REFUSAL OF SUITABLE WORK. MR. D. UHLIG PARTICIPATED BY PHONE. NO BOARD REPRESENTATIVE ATTENDED. MR. UHLIG AND MR. GITTER THREATENED ME THAT IF I DID NOT ANSWER MR. UHLIG'S QUESTIONS THE WAY THEY WANTED THAT I WOULD BE PENALIZED MR. GITTER TWICE GOING OF THE RECORD TO MAKE THREATS. MR. GITTER ALSO STATED THAT IT WAS NOT HIS CONCERN THAT DOCUMENTS SUBMITTED WERE FRAUDS AND THAT I COULD NOT SUBPOENA ANY DOCUMENTS OR WITNESSES. MR. UHLIG REQUESTED THAT THE BOARD ACT ON ALTERED TESTIMONY AND DOCUMENTS HE KNOWS TO BE FRAUDULENT.

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Petitioner states that the Board of Education's appeal filed in October of 1992 remains unheard to the present. THE N.J. DEPT. OF LABOR HAS BEEN PARTY TO ALTERING SWORN TESTIMONY, HARASSMENT AND DENIAL OF MY DUE PROCESS RIGHTS FOR THE PURPOSE OF FURTHERING A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS.

Petitioner alleges that the New Jersey Education Association paid attorneys, Mr. Stephen Klausner, Mrs. Sharon Lynch Norton and Mr. Thomas Cavanagh, have acted to obstruct my rights AND CONCEAL CRIMINAL ACTS. They have answered a malicious [redacted] AND INTENTIONAL VIOLATION OF MY RIGHTS by the Edison Township Board of Education with what has proved in a period of 16 months to be, if the term in law exists, a malicious defense. Their actions have been to damage me financially, acted to ensure that no sworn testimony, written record, charges or investigation exists. They have given the Board AND E.T.E.A. opportunity to continue to act against me without reply. THEY HAVE KNOWINGLY SUBJECTED ME TO CRIMINAL HARASSMENT UNDER N.J.SA. 2C:33-4(d). SO AS TO COERCE ME INTO RETIREMENT AND END MY EMPLOYMENT CONCEALING 10 YEARS OF CIVIL AND CRIMINAL VIOLATIONS.

Petitioner states the following facts in support of this allegation:

On my original contact with Mr. John Gundry, he advised me to request legal representation through the Middlesex County Uniserv Representative, Michael Parise. I was assigned to Mr. Stephen Klausner. No grievance was entered by Mr. Gundry who claimed that he had no knowledge of the A.D.A. Mr. Klausner took no active role that can be documented until the October 29, 1992 meeting, where he sought to cause additional delay, misinformed me of my rights and failed to advise me on school law or any other law. Following my third trip to the E.E.O.C., I attempted to fulfill the Director's demand that I produce an affidavit from my attorney to file



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charges. Mr. Klausner again acted to cause delay, on his request:
THE ACTIONS OF CORRON100 GIGANTE INDICATE THAT HE CONSPIRED WITH THE EDISON TOWNSHIP BOARD OF EDUCATION. THE E.TE.A. AND STEPHEN KLAUSNER TO OBSTRUCT MY RIGHT TO MAKE A EE.O.C. COMPLAINT.

I traveled to Mr. Klausner's Somerville office on January 6, 1993, to correct the affidavit for the E.E.O.C. He allowed me to sit in a storeroom in his office and correct the errors. This affidavit was a minimal statement of the facts omitting the issue of my missing paycheck, the withdrawal of my funds from VALIC, which I added to the affidavit. Mr. Klausner then instructed me to sign five blank pieces of paper "to make it easier for the secretary" to word process it, expedite making my complaint to the E.E.O.C. and save me a 100 mile round trip to his office. When I hesitated and stated that I had no objection to returning to sign the affidavit, he became angry. He spread the papers out on the table and pointed at them; raised his voice stating, "We do this all the time". I reluctantly followed his instruction and signed those blank sheets where he indicated. I ASKED WHEN IT WOULD BE FILED :GAVE ME A LONG STORY ABOUT HOW HE WANTED TO PRESENT IT PERSONALLY TO THE DIRECTOR OF THE E.E.O.C. IN NEWARK BECAUSE IT WAS IMPORTANT THAT IT BE HANDLED "CORRECTLY". CORRECTLY IN THIS AND OTHER CASES MEANS NEVER.

I repeatedly called Mr. Klausner regarding the affidavit for the E.E.O.C. and was given a variety of excuses for delay in delivering it to the Newark office. I ended representation by Mr. Klausner on February 12, 1993. He never delivered the affidavit to me or the E.E.O.C. AND HAD ACTED TO OBSTRUCT MY RIGHT. TO "DUE PROCESS" THRU THAT AGENCY. N.J. E.A. PAID ATTORNEYS DID NOT RESOLVE A SINGLE ISSUE, FILE ANY COMPLAINTS, CREATE ANY RECORD DURING 20 MONTHS OF REPRESENTATION. PROTECTED CONSPIRACY AND VACATED MY RIGHTS BY TIME.

During this period, I had no income, I had no advice other than Mr. Klausner's which was to wait and he would eventually act to obtain my back salary. Mr. Gundry's advice was to not seek AND THAT LATER BECAME MRS. NORTON'S POSITION, THAT IN A FEW YEARS THE WORLD BE SETTLED, AND THRU THE FEDERAL COURTS, A JURISDICTION NO OTHER ATTORNEY COULD REASONABLY SUPPORT.



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private counsel because it would be costly and I might lose.
MR. GUNDRY BY HIS ACTIONS INDICATED THAT HE WAS A CONSPIRING PARTY HIS INTEREST BEING TO ACT WITH THE BOARD TO END MY EMPLOYMENT AS A MEANS OF CONCEALING TEN YEARS OF FRAUD AND CONSPIRACY TO OBSTRUCT MY RIGHTS.

I disregarded Mr. Gundry's advice and tried to find my own attorney. In a conversation with Mr. Ralph Ventola, he suggested I contact a law firm of Chamlin, Rosen, Cavanagh and Uliano. Mr. Ventola stated that he had been referred to them through the N.J.E.A. to handle an auto accident. Having had serious difficulty finding an attorney RELUCTANTLY. I took his advice. AT THAT TIME I DID NOT REALIZE AS BENEFICIARY OF THE FRAUDULENT ALTERATION OF THE SENIORITY LIST IN 1984 THAT HE HAD A IMPROPER INTEREST IN THIS MATTER. HIS CLAIM OF USING THIS LAW FIRM FOR A AUTOMOTIVE LIABILITY MATTER IS UNSUPPORTABLE. I WAS REFERRED TO A LAW FIRM Petitioner states: THAT CONTINUED AND CONCEALED MR. KLAUSNER'S ACTIONS [illegible] SOLD ME WHILE OBSTRUCTING MY RIGHTS.

That I first contacted Mrs. Sharon Lynch Norton and Mr. Thomas Cavanagh on or about January 24, 1993, having had no advice, support or action taken by Mr. Stephen Klausner, the attorney appointed to defend my rights for a period of 4 1/2 months.

I had been referred to their law firm by Mr. Ralph Ventola, the teacher who had been improperly ADVANCED . . . in seniority by granting him one year veterans seniority. THIS WAS DONE IN 1984 AS STATED HEREIN FOR THE PURPOSE OF ENDING MY EMPLOYMENT AS A ACT OF ECONOMIC DISCRIMINATION BASED ON REAL OR ANTICIPATED INSURANCE COSTS.

That I first met with Mrs. North and Mr. Cavanagh on or about February 2, 1993, and Mr. Cavanagh, who repeatedly raised the questions; What did you do wrong? When was your hearing before the Board of Education? What are you doing for money?, but notably did not use the word "suspended" OR "DUE PROCESS". He stated that there was something very wrong here, that I should have my case to him, that I should back the N.J.E.A. INTO A CORNER. and get my file from my current attorney, Mr.



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Klausner. It was tentatively arranged that Mrs. Norton would also provide representation in what I believed was an American with Disabilities Act dispute. THESE ATTORNEYS ACTIVELY CHOSE TO IGNORE CORRUPTION AND CRIMINAL ACTIVITY BY THE DEPT. OF LABOR, WASHINGTON NATIONAL INSURANCE COMPANY, THE ANNUITY COMPANY VALIC; THEY CONFIRMED CONSPIRACY.

That when I contacted Mr. Michael Parise to change representation from Mr. Klausner to Mr. Cavanagh, he threatened me with libel if I were to say anything about Mr. Klausner's representation in this dispute. AGAIN ALLEGE CRIMINAL HARASSMENT ON THE PART OF MICHAEL PARISE. CITING N.J.S.A. 2C 33-4 (d) STATEMENTS MADE BY MR. VENTOLA IMPLY WHAT NOW APPEARS TO BE TRUE THAT MICHAEL PARISE WAS PARTY TO THE FRAUD OF 1984.

Mrs. Norton called me on February 9, 1993, to inform me that representation had been changed to Mrs. Norton and Mr. Cavanagh.

Having followed Mr. Cavanagh's instructions, I called Mr. Klausner to pick up my file, which he resisted. I picked up my file on February 12, 1993, examined it, inserted the missing papers in regard to the Edison Township Board of Education's removal of my funds from VALID by fraud. WHEN I PICKED UP MY FILE I ENCOUNTERED MR. VAN WEISS WHO WISHED ME GOOD LUCK AND STATED THAT "SOMETHING SHOULD HAVE BEEN DONE ABOUT THIS. IT WAS MY EXPERIENCE THAT AFTER DEC. 8, 1992 APPEARANCE WITH ME AT THE E.E.O.C. MY CALLS WERE DIRECTED TO MR. KLAUSNER. (CON'T PAGE BOTTOM

I delivered my file to Mr. Cavanagh on February 16, as arranged, at 9:00 a.m., and encountered him in the lobby. He was visibly upset, did not want to look at my file and told me that I should make an appointment to speak to him, AND DURING THEIR REPRESENTATION MRS. NORTON AND MR. CAVANAGH CHOSE TO IGNORE ANY ISSUE OTHER THAN THE BOARD'S "FAILURE TO ACCOMMODATE". A OBVIOUS CONFLICT OF INTEREST EXISTED, AND N.J. EA. AND ATTORNEYS REFUSED TO ACKNOWLEDGE IT.

On March 2, 1993, I met again with Mr. Cavanagh and Mrs. Norton and was told that they would file in Superior court with an order to show cause. I informed them that while I was waiting for

APPARENTLY MR. VAN WEISS HAD ACTED BEYOND MR. KLAUSNER'S INSTRUCTIONS AND STATED TO ME THAT THE BOARD'S WITHOLDING MY PAY AND REMOVING MY FUNDS FROM MY ANNUITY WERE "POSSIBLY CRIMINAL". IT APPEARS THAT THIS DEC. 8 CONVERSATION WAS A FACTOR THAT RESULTED IN MY HOME BEING BURGLARIZED ON DEC. 11, 1992



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them to decide to represent me, I had gone to the N.J. Division of Civil Rights in Trenton to file the correct charges and preserve my rights. I told them that I was concerned that specific charges of retribution and harassment had been edited out "to keep it simple"; that charges regarding the actions of the School Board IN regarding the fraudulent removal of my funds from the VALIC Annuity were described as criminal, but I was told that the Division on Civil Rights was not the correct venue, THAT I SHOULD REPORT THIS TO AUTHORITIES IN EDISON OR MIDDLESEX COUNTY. WHEN I CONTACTED THE MIDDLESEX COUNTY PROSECUTORS OFFICE MUCH LATER IT WAS HANDLED AS I EXPECTED, "NOT THIER JURISDICTION".

I ALSO INFORMED THEM

That charges against the Washington National Insurance Company, VALIC AND B.B. DE CASTRO were left out and that I wasn't given a copy of any papers and I had shown them all of my documents until that time. Mr. Cavanagh's reply was "Do us a favor and don't file any more complaints."

MRS. NORTON THEN COERCED ME TO CANCEL THE FACT FINDING HEARING SCHEDULED FOR MAY 6, 1993. COERCED ME TO DROP THE DCR. COMPLAINT AND ARRANGED FOR MY REQUEST FOR "SUBSTANTIAL WEIGHT REVIEW" BY THE PHILADELPHIA DISTRICT EE.OC TO DISAPPEAR.

I also informed them that the copies of the tapes of the December 4th unemployment hearings that I received were edited to change the part where Lorene Moore had committed perjury. Mr. Cavanagh's reply was that they were usually correct. I replied that I was sure these were not. He asked me who I thought had the correct tapes. I replied that I thought Edison would have the tapes, that Dr. Kreskey was known for keeping his name off of his "dirty work", That they would be used to blackmail Lorene Moore into resigning. That she would have to take the blame for what was being done. Mr. Cavanagh expressed his doubts. (Lorene Moore resigned in July of 1993). An event Mr. Gundry of the ETEA was described as a coincidence. AND THAT SHE JUST COULDN'T GET ALONG WITH DR. KRESKEY. I also stated that Dr. Kreskey had

9504370061 3

involved the Board of Education in other incidents of discrimination in the past, that I had heard that he had acted against other disabled people and people who were close to retirement. That it was generally known that the previous Assistant Superintendent, Mr. Castaldo, had resigned and gone to the Board of Education and told them "plenty" REGARDING CORRUPT ACTIVITY. I also said that retaliation and harassment was how Dr. Kreskey ran the schools, THAT THE E.T.E.A. DID NOTHING that everyone was afraid of punitive transfers,, and that nothing could be done about it. AND THAT DR. KRESKEY WOULD RETALIATE AGAINST ALL OF THE TEACHERS! DEFENSE I also told them when I talked to friends in the school system about what had gone on, they usually told me that they wouldn't even tell anyone they had talked to me.

I ALSO STATED THAT I BELIEVED THAT THIS SITUATION WAS SO SERIOUS THAT DR. KRESKEY WOULD LOSE HIS JOB IF HE WAS CAUGHT THIS TIME. (DR. KRESKEY RESIGNED IN AUGUST OF 1994 AS OF DECEMBER 1994.)

I was very upset. Mr. Cavanagh said the first thing would be to get me back to work. IN FACT NO ACTION WAS TAKEN IN MY BEHALF. MAY OF 1994 I BELIEVE AND ALLEGE THAT THE SUSPENSION WITHOUT PAY WAS PROLONGED TO "CORRECT" THE ONGOING FRAUD REGARDING ANY SENIORITY, AND THAT MRS. SHARON LYNCH NORTON AND MR. THOMAS CAVANAGH ACTIVELY AND KNOWINGLY CONTINUE THAT FRAUD.

I replied that if nothing was done legally, the correct charges filed, I would be a victim of Dr. Kreskey's actions in retribution. WHICH PROVED TO BE ENTIRELY CORRECT I wanted to go back to work, but I already knew too much about VALIC and Washington National and that if nothing was done to protect me or make them pay for what they had done, that they would frame me. MR CAVANAGH ALSO QUESTIONED ME AS TO WHY I HAD WANTED TO PURSUE COMPLAINTS AGAINST VALIC AND WASHINGTON NATIONAL. I STATED THAT THEY HAD BROKEN THE LAW.

At the end of this meeting, Mr. Cavanagh left the office and Mrs. Norton and I continued a discussion of the actions of The Washington National Insurance Company. They had withheld my benefits for 81 days from October 26, 1992, and only paid when

9504370061 4

Congressman Pallone's office had called. I told Mrs. Norton that this was the N.J.E.A. endorsed insurer and, like VALIC, they should be companies that teachers could rely on. Mrs. Norton agreed that there was something wrong; that if the cause of this claim was Edison's refusal to accommodate my disability, then the DISABILITY INSURER insurer would have a cause of action to sue the Edison Township Board of Education for their loss in paying my claim. THIS WAS LATER CONFIRMED BY THE ANNUITANTS E.E.O.C. DISTRICT OFFICE. Our meeting ended with this unfinished issue. WHEN I INITIATED FURTHER DISCUSSIONS OF THE ACTIONS OF WASHINGTON NATIONAL MRS. NORTON STATED THAT IT WAS A SEPERATE ISSUE AND THAT I HAD 6 OR 7 YEARS TO FILE AGAINST THEM BUT I WOULD HAVE TO PAY FOR A PSYCHIATRIST & PRIVATE INVESTIGATOR

At this meeting, I had frequently referred to Mr. Klausner's actions when replying to Mr. Cavanagh's questions. I was trying to explain why nothing was being done and I could not without mentioning Mr. Klausner. Mr. Cavanagh kept telling me that they didn't want to hear about Mr. Klausner. THEIR INTEREST AGAIN CONFOUNDED. A UNSTATED CONFLICT OF INTEREST EXISTED THROUGHOUT THEIR REPRESENTATION. THEIR INTEREST WAS TO PROTECT THE CONSPIRING PARTIES AND DAMAGE ME AND IN EFFECT PROTECT THEMSELVES.

I also provided Mrs. Norton with a copy of the lawsuit that Mr. Klausner claims he had started prior to my ending his representation. I told Mrs. Norton and Mr. Cavanagh I was concerned that he might have filed it without my knowledge; that it had statements in it that Mr. Gundry had pointed out as things that damaged me. WHEN I HAD POINTED OUT TO MRS. NORTON, IT MADE MY HEALTH APPEAR WORSE THAN IT IS. I also stated that he had never discussed taking action in Superior Court or any other court. He just kept delaying any action and I was very upset because the affidavit was not the one I had signed for an E.E.O.C. complaint. (PAGE BREAK)

HERE MRS. NORTON AND MR. CAVANAGH FOLLOWED MR. KLAUSNER'S COURSE OF ACTION TO CONCEAL THE MOST SERIOUS OFFENSE, THAT I HAD BEEN SUSPENDED WITHOUT PAY OR DUE PROCESS. EDISON HAD NO DEFENSE FOR THEIR VIOLATION OF MY RIGHTS.

I explained how my signature would have been put on this

THAT MR. KLAUSNER HAD TAKEN THE POSITION THAT I WAS UNABLE TO LEARN TO TEACH NEW CLASSES; I TOLD MRS. NORTON THAT I COULD NOT SUPPORT THAT STATEMENT BECAUSE IT WAS NOT TRUE. I STATED THAT I HAD BEEN RE-ASSIGNED

TO TEACH DRAFTING AND HAD BEEN GIVEN ADEQUATE TIME TO LEARN THE ONLY AREA IN THE CURRICULUM THAT I WAS NOT FAMILIAR WITH WHICH WAS COMPUTER ASSISTED DRAFTING; MY LEARNING DISABILITY JUST MEANS THAT IT SOMETIMES TAKES ME LONGER TO LEARN.



950437006 15

affidavit, that Mr. Klausner had coerced me to sign five blank pieces of paper, telling me that he couldn't take any action at the E.E.O.C. without it and that the secretary might not get it to come out right. I also expressed my concern that other fraudulent uses of my signature might exist. THERE IS NO QUESTION THAT MR. KLAUSNER ALSO KNEW THAT THE LETTERS OF SEPT. 9, 15 AND OCT 18 SUBMITTED BY L. MOORE WERE FRAUDULENT.

And state:

Mrs. Norton has ~~instructed~~ ALTED TO COERCE me on a number of occasions to drop my complaint with the D.C.H.R. STATING that action in Superior Court could not begin until I dropped the complaint, and if I lost at the fact finding hearing scheduled for May 6, 1993, I would lose entirely and have no right of appeal. ON FEB. 9, 1994 MRS. NORTON BOXED ME AMONG THE SUPERVISORS I replied that I was looking forward to that hearing and I would finally have an opportunity to state what VALIC and Washington National had done. WHEN I RESISTED DROPING THAT COMPLAINT MRS. NORTON MADE THE DECISION TO CANCEL THE DCR FACT FINDING HEARING AND THEN NOTIFIED ME THAT SHE HAD, AND AS I RECALL CLAIMED IN A PHONE CONVERSATION THAT I HAD AGREED TO THIS.

Mrs. Norton and I met again on April 20, 1993, and discussed a meeting to be held with the representatives of the School Board on April 21, 1993, which was cancelled by Edison. At the end of that meeting, Mrs. Norton and I spoke about the lack of correct charges against all of the parties who had acted against me, and I stated that something should be done. I inquired about the Justice Department and if I could file a complaint there. Mrs. Norton told me that I could not because we would be going to Superior court. At that meeting, Mrs. Norton also told me that she was going to cancel the "fact finding hearing" at the Division of Civil Rights and that if I lost there, I would have no appeal. I now ~~believe~~ UNDERSTAND. that Mrs.

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Norton's interest was to conceal the wrong doing by Mr. Klausner by the Edison School Board, by VALIC, Washington National and Unemployment, THE EDISON TOWNSHIP EDUCATION AND OTHER PARTIES I had received no ~~benefits by that date~~ UNEMPLOYMENT BENEFITS BY THAT DATE AND NO HEARING HAS EVER BEEN HELD ON EDISON'S APPEAL OF MY BENEFIT, ~~TO MY KNOWLEDGE THERE HAS NEVER BEEN ANY DOCUMENTATION OF THE ACTUAL BASIS FOR THEIR APPEAL~~

That Mrs. Norton had told me that following the meeting with the superintendent, DR. JOSEPH KRESKEY WHICH WAS delayed until April 28, 1993, that we would go through my personnel file. I had told Mrs. Norton that I wanted to see the medical finding of Dr. DeCastro; that I thought there was something wrong with my sick day accumulation. At the meeting of April 28, 1993, I was instructed that I was not to say anything and Mrs. Norton told me after that meeting that they were too busy to let me see my records. AS OF 6-4-94 THE EDISON TOWNSHIP HAS SUBJECTED ME TO REDUCTION-IN-FORCE AND ACTED IN DISCRIMINATION AND HARASSMENT AND REFUSED TO PROVIDE ANY ACCOUNTING OF MY SICK DAY ACCUMULATION. / AND AS OF JAN. 1, 1995 DISCRIMINATION CONTINUES.

I further allege that this meeting may have been entered as my defense against the false swearing AND MALICIOUS PROSECUTION. of the charge of "no attendance" by Lorene Moore and Dr. Joseph Kreskey before the Edison Township School Board. I never received notice of the charge, AND WAS DENIED DUE PROCESS or was given the opportunity to appear before the Board of Education to refute that charge. / SEE PAGES A-71, 72, 73 I HAVE A SERIOUS CONCERN THAT I MAY HAVE BEEN REPRESENTED BEFORE THE COMMISSIONER OF EDUCATION ON THIS ISSUE WITHOUT MY KNOWLEDGE. I ALSO ALLEGE THAT THIS CHARGE WAS MADE TO CIRCUMVENT N.J.S.A. 18A:30-3.3

I state that Mrs. Norton and Mr. Cavanagh took no action to defend my rights as a tenured teacher or as a disabled person, that they have acted to obstruct my rights so as to damage my seniority and tenure; they have taken no action to end CRIMINAL harassment, retribution and economic hardship, subjected me to stress and anxiety. They have acted to conceal the use of a fraudulent

IT IS MY UNDERSTANDING THAT IN DR. KRESKEY AND LORENE MOORE'S FALSE SWEARING AND MALICIOUS PROSECUTION BY THE BOARD OF EDUCATION ON THE CHARGE OF "FAILURE TO ATTEND" / SEE PAGES A-71, 72, 73 / WAS REPRESENTED BY MR. STEPHEN KLAUSNER WITHOUT MY KNOWLEDGE OR PERMISSION.



950137006 17

accounting of seniority, AND USED THE LEGAL PROCESS TO DAMAGE ME. Their actions have been to damage my tenure and seniority to correct that fraud, and ALLEGE THAT Mrs. Norton has assisted Dr. Joseph Kreskey THE E.T.E.A. AND THE BOARD OF EDUCATION in denying me due process, OBSTRUCTING MY RIGHTS AS A TENURED TEACHER AND CONCEALING CRIMINAL VIOLATIONS OF LAW.

They took no action to return me to employment beyond corresponding with the Board of Education attorney, Mr. Firenzi. Mrs. Sharon Lynch Norton knowingly mis-stated the accommodation I required AS BEING THAT I TEACH NO MORE THAN TWO PERIODS IN A ROW. to Mr. Firenzi so as to reduce me in pay and assignment to a 4/5 teaching position so as to damage me financially and subject me to the same punitive transfer to a Middle School position. IN A LETTER TO MR FIRENZI OF MAY 2, 1993 MRS. NORTON NAMES THE SPECIFIC DAMAGING STATEMENT THAT I HAD PREVIOUSLY STATED SHOULD NOT BE MADE BECAUSE IT WAS NOT TRUE, THAT And State: THAT I HAD A "INABILITY TO LEARN NEW CURRICULUM.

That in negotiating my return to employment at a meeting with the representatives of the Edison Township Board of Education, no mention was made that I had been suspended without due process or pay for 13 1/2 months. Mrs. Norton was resistant when I stated to her that a part-time schedule was a violation of my rights as a tenured teacher. She removed my copy of this offer of a 4/5 Middle School position that would not accommodate my disability from my possession and allowed my suspension to continue for an additional week. I ALSO ASKED MRS NORTON TO REPLY TO A SECOND PROPOSAL OF A FULL TIME SCHEDULE IN THE FOLLOWING WAY: "THAT I HAD NO INPUT INTO THE SCHEDULE OFFERED. NO MEDIATION HAD TAKEN PLACE AND THAT IT REQUIRED ME TO PREPARE FOR 7 CLASSES. SHE WOULD ONLY STATE No action has been taken to protect me, repair my seniority, THAT I the financial damage done to me, stop CRIMINAL harassment and RETALIATION HAD SEVEN PREPARATIONS



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As I stated to Mrs. Norton and Mr. Cavanagh, that immediately on my return to employment on the coincidental date of October 15, 1993, I was given one day of employment before harassment began. ON MY RETURN TO EMPLOYMENT ON OCT. 19 I WAS ASSIGNED TO 4 CLASSES IN A ROW. THAT WAS NOT THE SCHEDULE THAT MR. JOHN COE HAD TOLD ME I HAD FOR H.S.P.T. TESTING. WHEN I APPROACHED MR. EDWARD SAMOLEWICZ ON THIS HE TOLD ME HE HAD TO BUCK THE EDISON TOWNSHIP'S AGENTS to create the appearance that my rights have been protected, THAT DELAY IN RETURNING TO WORK WAS MY DOING, THAT AN EFFORT WAS BEING MADE BY EDISON TO ACCOMMODATE ME. IN RETROSPECT I REALIZE THAT MY RIGHTS UNDER "SCHOOL LAW" WERE CLEARLY VIOLATED. There are documents that can be submitted on request; they are carefully constructed by my attorneys and ACCOMMODATE MY DISABILITY THEN LATER CORRECT

Petitioner states that the following events occurred as a result of my following Mr. Cavanagh's instructions and ending Mr. Klausner's representation:

I traveled to Somerville on February 12, 1993, to pick up my file and deliver it to Mr. Thomas Cavanagh who had assured me that he would take action to protect my rights; he was also a "N.J.E.A." attorney. I had no further contact with Mr. Klausner. LATER I GAVE MRS. NORTON A COPY OF KLAUSNER'S "LEGAL WORK" WITH CORRECTIONS. AT THE TIME I DID NOT UNDERSTAND THE UNDERLYING ISSUES THAT HINDER THE REASON FOR THE BOARD'S ADVERSE ACTIONS, AND THE FAILURE OF ATTORNEYS TO ACT.

I later received a letter from Mr. Klausner dated February 20, 1993, SEE PAGE A-74 ) and refute his statements;

Paragraph 1 - Mr. Klausner certainly knew by February 4, 1993, that I intended to end his representation. I had called Mike Parise, the Middlesex County Uniserve Representative who threatened me with libel if I said anything about Mr. Klausner. He never requested that I send him a note. He knew I was coming for the file. There wasn't any of his work, only

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documents with a fax date that preceded his representing me by months.

Paragraph 2 - His claim that he prepared an affidavit is false; I have a copy of the mentioned affidavit and it is not any affidavit that I have ever seen or signed. Mr. Klausner's fixing my signature to that document is a criminal act.

Paragraph 3 - He had never advised me to litigate in Superior Court or any other venue in September or any other time. His delaying actions were a tremendous source of anxiety to me and my family. I HAD IN FACT PLEADED WITH HIM TO TAKE ACTION IN THE ONLY JURISDICTION THAT I HAVE ANY OF, THE E.E.O.C. AS WITH MRS. NORTON WHO REPRESENTED ME LATER THEY REFUSED TO ASSIST ME IN FILING CHARGES AGAINST ANY OF THE CONSPIRING PARTIES.

Paragraph 4 - It is true that I received all of the papers in file; he had removed the documents regarding Edison's criminal transactions regarding my SEPT. 1992 PAYCHECK AND WITHDRAWAL FROM MY ~~[illegible]~~ VALIC account.

Mr. John Gundry allowed me to copy the Superior Court action Mr. Klausner had prepared AND REFERENCES IN THIS LETTER. He never gave me a copy; IT CONTAINS FALSE STATEMENTS AND IS NOT ANY AFFADAVIT I SIGNED OR WOULD SIGN.

Petitioner alleges that this was prepared and filed in Middlesex County Superior Court as a means of damaging me by preventing me from filing complaints or actions in other venues or jurisdictions.

Petitioner states that in a conversation months later, I was



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told that Mr. Klausner had recently tried a case based on the notably rare disorder Narcolepsy. I have called Middlesex County Superior Court to try to find whether it was my case and had been heard without my knowledge. I asked that the computer record be searched by Plaintiff and Defendant, no record was found.

Petitioner believes that this matter requires further investigation by authorities.

Petitioner states that in attempting to defend my rights, I have attempted to act in my own behalf and submit the following:

I allege that Edison Township Board of Education President Mr. Dennis Pipala acted to obstruct my rights as a tenured teacher in his failure to act to upon receipt of my letter of January 26, 1993 (PAGES A-76,76,77). I NOW UNDERSTAND THE REASON FOR PRECIPITATING A. AMERICANS WITH DISABILITIES DISPUTE THAT WAS DESIGNED TO END MY EMPLOYMENT THRU CRIMINAL HARASSMENT AND CONCEAL And state: A TEN YEAR CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS.

That I have no reply to this letter other than a letter from the Board's attorney, Mr. Joseph Firenczi, of March 5, 1993, which states "It would be inappropriate for me to respond to your inquiry in view of the fact Mr. Renaud has threatened litigation." SEE PAGE A-78,79,80: FERENCZI REFUSED TO REPLY TO MY LETTER AND TO CONGRESSMAN PALLONE'S INQUIRY, NO FURTHER INQUIRY WAS MADE TO MRS. NORTON/THE LONG BRANCH CITY ATTORNEY OR MR. CAVANAGH. AND

I further allege that Mr. Firenczi's reply & Mr. Dennis Pipala's actions were to conceal the true facts of this dispute, that the Edison Township Education Association and the Edison



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Township Board of Education had conspired to damage me so as to conceal a criminal fraud, removal of my funds from my annuity account and that teachers lacking proper certification had been retained in employment while I and five or more fully certified teachers had been improperly subjected to Reductions-In-Force to end their employment. ALL OF THESE ACTIONS CAN BE FOLLOWED BACK TO THE FRAUD REGARDING MY SENIORITY IN 1984 AND THAT FRAUD CAN BE EXPLAINED IN ONE PERSONAL WAY: DISCRIMINATION BASED ON REAL OR ANTICIPATED MEDICAL INSURANCE COSTS, A MATTER OF UNLAWFUL ECONOMIC DISCRIMINATION

And state that Mr. Firenzi's letter also states "The Board has extended itself in accommodating Mr. Renaud's disability". I had never had any offer of accommodation, beyond a fraudulent schedule offered in Lorene Moore's letter of October 15, 1992; and had been suspended without pay or due process since September 1, 1992, and that I and others had been a victim of a criminal fraud since 1984, my proper position in seniority purposely concealed since that time. FOR THE PURPOSE OF DISCRIMINATION AGAINST THE HANDICAPPED, AND END MY HEALTH INSURANCE AND DISABILITY INSURANCE. THRU WASHINGTON NATIONAL INSURANCE COMPANY

I attempted to maintain a source of income during this time and I submit here THE FOLLOWING STATEMENTS AND ALLEGATIONS.

I allege that The Washington National Insurance Company who issues the disability policy to the New Jersey Education Association on which I, Edward Renaud, Petitioner, hold a certificate of insurance conspired with the Edison Township Education Association, the Edison Township Board of Education to damage me financially by violating N.J.S.A. 17B:27-44, and 17B:30-13.1, section d,e,f,h SEE PAGES A-81, 82, 83, 84, 85



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And states:

That the recent removal of Michael Parise from the position of Uniserv Representative for the N.J.E.A. is a related incident despite claims by Mr. John Gundry E.T.E.A. that it is not.

I BELIEVE THAT HE WAS THE CONNECTING PARTY BETWEEN THE WASHINGTON NATIONAL INSURANCE COMPANY AND THE E.T.E.A. AND FURTHER ALLEGE THAT HE WAS PARTY TO SELLING A.I. SECURITY IN 1984.

That the Washington National Insurance Company had Claims Analyst, Christine Hampp, failed to make any reasonable investigation of my claim for disability benefits. Mrs. Hampp has stated to me as late as February 17, 1993, that they had no contact with the Edison Board of Education, neglecting to investigate this claim, violating N.J.S.A. 17B:30-13.1 A REASONED INVESTIGATION COULD HAVE REVEALED THAT THERE WAS A FRAUD, ONE ORIGINATED BY THE EDISON BOARD OF EDUCATION AND THE E.T.E.A. TO OBSTRUCT MY RIGHTS. RATHER THAN ACT CORRECTLY, WASHINGTON NATIONAL JOINED THE CONSPIRACY.

That I submitted a letter ( PAGE A-87 with a claim form completed by Neurologist, Dr. June Fry, SEE PAGES A 88,89 I received by Washington National on November 16, 1992. This claim form clearly states that I am under her care (Part B, line 9) and totally disabled, (line 10). In this instance, disability was contrived by Edison, THE E.T.E.A AND N.J.E.A ATTORNEYS; WHO BY THEIR ACTIONS DEFRAUDED WASHINGTON NATIONAL OF APPROXIMATELY $18,000.00 IN BENEFITS PAID TO ME WHILE MY RIGHTS WERE OBSTRUCTED. IT WOULD APPEAR THAT (PG BOTTOM)

That having made no reasoned investigation of the actual cause of this claim which was a punitive transfer to end accommodation to my disability and end my employment, AND A CONSPIRACY TO OBSTRUCT MY RIGHTS Washington National demanded further unwarranted documentation of my disability so as to cause delay, harass me and subject me to undue hardship. CITE N.J.S.A. 2C:33-4 These actions were the same as those of Lorene Moore, Director of Personnel for Edison Township, Stephen Klausner, the N.J.E.A. paid attorney.

WASHINGTON NATIONAL AS A CO-CONSPIRATOR IS UNLIKELY TO DISCLOSE THIS FRAUD TO THE AUTHORITIES, ON THIS ISSUE MRS. NORTON STATED TO ME THAT SHOULD I EVENTUALLY RECOVER MY BACK PAY THAT I WOULD HAVE



TO REPAY WASHINGTON NATIONAL FOR THEIR LOSS AND UNEMPLOYMENT WOULD HAVE TO BE REPAID. I BELIEVE THAT MRS. NORTON MIS-STATED THE FACTS. MITIGATION OF DAMAGES IS INAPPROPRIATE IN MATTERS WHERE CRIME HAS BEEN COMMITTED.

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That there exists a large volume of documents and correspondence on this issue that I will provide to the Commissioner and any other agency investigating this matter, stating here for the sake of expediency:

That I received no payment of this claim until 81 days after Washington National had received my claim, VIOLATING STATE LAW. that payment was received only after Congressman Pallone's District Office Manager contacted Washington National on my behalf.

That I received payment to December 12, 1992, dated February 1, 1993, a partial payment of $4,312.00, VIOLATING STATE LAW, AS STATED ELSEWHERE.

That I traveled to Clark, NJ, on February 17, 1993, to the office of Washington National to obtain copies of the documents in my file, that they had not provided. I stated to Ms. Hampp that Edison was clearly involved in discrimination and that my concern was they appeared to be involved.

I then received the amount of $2,904 in a check dated February 19, 1993 paying my claim to that date. It states on that check that I had been approved for monthly benefits and would automatically received a monthly check through May.

I further allege that they then suspended payment of benefits for a period of 20 days as an act of retaliation for my filing



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charges against the Edison Township Board of Education with the N.J. Division of Civil Rights. The date of filing of that verified complaint is February 22, 1993.

And state:

That it is of note that acts of retaliation, harassment, aiding and abetting, coercion and intimidation were "edited" out of that complaint on the basis that it was best "to keep it simple". Charges against VALIC were stated as a criminal charge that the Division of Civil Rights did not handle and I was told I should report them somewhere else, Edison being stated as a possible venue.

Charges against Washington National were described as "interesting" and that I might be able to fit them into the fact finding hearing that would be scheduled.

That I have made one phone and one in-person inquiry as to why benefits were suspended. IN FEBRUARY I have asked that question in correspondence. There has never been any explanation.

Benefits then continued until the date of June 15, 1993, when I wrote a reply to Edison's filing of an appeal at Unemployment. I stated that I wanted an in-person hearing on that appeal (SEE PAGE A-90,91 So as to subpoena documents, elicit testimony; in effect MY request FOR A due process which was refused. MRS. SHARON LYNCH NORTON. APPARENTLY DECIDED TO HAVE RECORD OF MY RESPONSE REMOVED FROM THE RECORD AND FILED HER OWN: THAT EDISON'S APPEAL SHOULD BE DISMISSED, AND IN SENDING COPIES OF ALL DOCUMENTS TO ME IT APPEARS THAT MY LETTER HAS DISAPPEARED, RECORD OF A EARLIER CLAIMS INTERVIEW ON JULY 17, 1992 DISAPPEARED.



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I allege that Washington National again acted in retaliation suspended benefit payments claiming in a letter of June 15, 1993, that they did not receive the completed claim form from Dr. Anthony Bruno, the local physician, who had been approved by Washington National in January of 1993 to certify my disability. IN A DISCUSSION WITH MRS. MARTIN IN WASHINGTON NATIONAL'S ACTIONS I STATED TO HER THAT THIS COMPANY WOULD HAVE THE SAME INTERESTS AS THE BOARD. THAT ENDING MY EMPLOYMENT WOULD END LIABILITY FOR DISABILITY CLAIMS. AND THAT THE BOARD'S And state: STERLING MY SICK DAYS WOULD REDUCE PAYMENTS DUE ME ON A LONG TERM DISABILITY CLAIM.

I received no further benefits until November 24, 1993, 5 months later; the majority of this time I had no income. The N.J.E.A. attorneys improperly advised me, took no action on my behalf, sought to cause delay and had in fact acted to conceal a criminal fraud regarding the seniority list AND CONSPIRACY TO OBSTRUCT MY RIGHTS used by the Edison Board of Education.

I furnished a replacement form, the first of 3 or more forms sent to Dr. Anthony Bruno on June 21, 1993. His office having kept no copies of the form delivered by hand following my May 11, 1993 appointment. I had requested that copies of forms be kept, stated to Dr. Bruno in person and correspondence that Edison, Washington National and others were acting against me looking to conceal violations of my rights by acting to further violate them, HARASS ME AND CAUSE DELAY.

I further allege that Washington National has acted to violate my privacy; they have, in a file under my name, a volume of material that by appearance would consist of hundreds of pages and comments that they have withheld from my examination. That they



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have an improper interest in compiling these documents having a contractual relationship with the N.J.E.A. who holds the policy on which I have a certificate of insurance, that Washington National has conspired with the Edison Township Education Association and the Edison Township Board of Education who have acted to conceal a criminal fraud AND CONSPIRACY TO OBSTRUCT MY RIGHTS in their accounting of my seniority and others, that they acted to obtain unspecified AND PRIVILIGED information contained in THOSE my files as a means of obstructing my rights. THERE ALSO EXISTS THE POSSIBILITY THAT THE CONNECTICUT GENERAL LIFE INSURANCE CO., WHO ACTING AS AGENT FOR EDISON TOWNSHIP BOARD OF EDUCATION MAY HAVE INFRINGED MY PRIVACY TO PROVIDE INFORMATION TO THE CONSPIRING PARTIES.

I allege that Dr. Anthony Bruno, M.D., has acted to aide and abet the obstruction of my rights as a tenured teacher, by his refusal to provide me with completed and correct claim forms to depriving me of a source of income granting aid to those who had conspired to conceal a criminal act, AND ACTED IN CRIMINAL HARASSMENT IN VIOLATION OF 2C:33-4(d) N.J.SA. HIS ACTIONS ALSO CONSTITUTE A BREACH OF IMPLIED CONTRACT.

And state:

That I supplied a claim form for disability benefits from the Washington National Insurance Company following an examination on May 11, 1993, and Washington National claimed to have not received those forms.

That no copies had been retained by Dr. Bruno's office as I had specifically requested, DR. BRUNO WAS SPECIFICALLY APPROVED BY WASHINGTON NATIONAL TO CERTIFY MY DISABILITY, THIS WAS DONE THRU THE ASSISTANCE OF MRS. HANLEY IN CONGRESSMAN PALLONE'S HAZLET OFFICE.

That I supplied Dr. Bruno's office with three or more forms as replacement for the "missing" form for benefits and for the period



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of disability from August 19, 1993.

That despite frequent phone calls and trips to his office speaking to his secretary, I received no completed forms, but a range of excuses over a period of 5 months.

That when I received one completed form on October 15, 1993, (SEE PAGES A 92,93) it had significant and damaging errors. The date of my last visit is an error that "creates" a coincidence with the end of the school year and Edison has created a number of other coincidences to make "coincidences" / the common element (IN DATES AND DOCUMENTS) rather than conspiracy. I BELIEVE THAT THERE WAS A INVESTIGATION AT THE DCR OR COMMISSIONER OF EDUCATION'S OFFICE INTO THIS MATTER DURING THAT PERIOD AND THAT AS A RESULT OF THAT INVESTIGATION DR. KREISKY'S RESIGNATION WAS NEGOTIATED. MRS. NORTON HAS CONFIRMED THAT THE DCR

That on line #6, Dr. Bruno looks to damage me; on a form where completion took 4 months by having his secretary, Mrs. Croken, check off the "no" box. Had I filed this form I would have helped Edison end my employment or raise questions about any statement I would make related to this dispute. The statement #6 and a "no" answer would indicate that I was not competent. (CONT. PAGE BOTTOM)

That it is notable that this and subsequent forms delivered to me indicate a "no" answer to the questions "is patient partially disabled", and a "no" to totally disabled in a strange contradiction gives a "no" answer, to the questions "Is patient a suitable candidate for occupational rehabilitation?" Patient's job "no"; and other work "no". In reply to the request to advise on

HAD INVESTIGATED THE COMPLAINT I HAD FILED IN FEB. OF 1993. SINCE I WAS NOT INCLUDED IN THAT INVESTIGATION I EXPECT THAT AS AT UNEMPLOYMENT THE BOARD WAS ALLOWED TO SUBMIT FRAUDULENT DOCUMENTS WITH THE SUPPORT OF N.J.E.A PAID ATTORNEYS.



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the dates of total disability there is the statement "limited disability" (See Doc. 25).

That in my last visit to Dr. Bruno, he questioned the origin of the statement "limited disability", stating that it was not a statement his office used. He stated that he had sent a correction letter in regard to this form, but did not inform me of its contents. HERE SEE PAGE BOTTOM. DURING THE TIME THAT DR BRUNO REFUSED TO SUPPLY A COMPLETED FORM WASHINGTON NATIONAL ACTED IN CRIMINAL HARASSMENT, N.J.S.A. 2C:33-4 (a) AS FOLLOWS; 7/16/93, COVER LETTER STATES (2ND REQUEST), 8/25/93 (FINAL REQUEST) AND AS OF NOVEMBER 19, 1993 SENT A LETTER THAT ADDITIONAL INFORMATION WAS NEEDED FROM DR. BRUNO PRIOR TO PAYING MY CLAIM.

That in writing this affidavit, I again examined the original of document PAGES A-92, 93 The "Doctor's" page has the date altered. This form was first dated on July 26, 1993, then changed to October 13, 1993, and was altered when received BY ME on October 15, 1993. IN THE PHONE CALL PRIOR TO THIS DATE I HAD ASKED MRS. CROCCO IF IT WAS ETHICAL TO TREAT A PATIENT AND THEN REFUSE TO FILL OUT THE FORMS. I ALLEGE THAT DR. BRUNO'S ACTIONS WERE RETALIATION FOR QUESTIONING HIS ETHICS, AND TO SUPPORT CONSPIRACY.

I further allege that this form was altered because it was the only form of the 3 or more that I had delivered to Dr. Bruno's office where I had not completed the "statement of employee". On each previous and subsequent forms I had completed that portion stating my position consistently, that the period of disability was not my choice or intent, BUT THE RESULT OF THE ACTIONS OF BY THE EDISON TOWNSHIP BOARD OF EDUCATION TO BAR ME FROM EMPLOYMENT. AND AS OF SEPT. 13, 1993 ADDED THAT THE N.J.E.A. ATTORNEY REPRESENTING ENTIL FEB. 16, 1993 HAD FAILED TO TAKE LEGAL ACTION.

Petitioner states that while the course of action pursued by N.J.E.A. attorneys led to increasing delay, I attempted to resolve or investigate issues resulting in the following:

I allege that the Edison Township Education Association

FROM ABOVE: WHEN I LATER OBTAINED A COPY OF DR BRUNO'S "LETTER" IT WAS A REPLY TO A REQUEST OF THE DATES OF MY DISABILITY. NOTABLY WASHINGTON NATIONAL FAILED TO INQUIRE AS TO THE CAUSE OF THAT DISABILITY WHICH WAS THAT THE BOARD HAD AGAIN SUSPENDED ME WITHOUT PAY OR DUE PROCESS AS A ACT TO COERCE ME TO ACCEPT A ILLEGAL AND PUNITIVE PART TIME POSITION.



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President, Mr. John Gundry, violated my rights as a tenured teacher ACTED IN DISCRIMINATION AND AS A CONSPIRING PARTY TO OBSTRUCT my right to due process under the grievance procedure stated in Article IV Teacher Rights Agreement between the E.T.E.A. and the Edison Township Education Association (SEE PAGE A.94, 95). THIS IS A GRIEVANCE ON THE ISSUE OF THE PERMANENT SENIORITY LIST, A CRITICAL ISSUE THROUGHOUT IN THAT IT WAS THE BASIS OF FRAUD AND CONSPIRACY BEGUN IN 1989. In doing so, John Gundry:

Declined to provide on my request the forms to file a grievance on April 12, 1993. I THEN SENT A LETTER FILING THAT GRIEVANCE TO MR. GUNDRY WHO...

Stated in following conversations in regard to this grievance; that it was filed, then later that "they are very angry about it", and again later, "it was gone to mediation", as of July 26, 1993, he stated to me that it was never filed. AND STATE THAT I GAVE A COPY OF THIS GRIEVANCE/LETTER TO MR. THOMAS CAVANAGH AT THE UNEMPLOYMENT OFFICE AT PERTH AMBOY PRIOR TO THE APRIL 15, 1993 HEARING

In a conversation of June 15, 1993, I asked Grievance Chairperson, Fred Ciociola, what happened to this grievance. His reply was that he did not know anything about it, AND STATED THAT HE WAS CALLED TO TELL ME THAT HE HAD GRIEVED MY LAYOFF. I ASKED HIM FOR A COPY OF THAT GRIEVANCE (SEE DOC 28 PG. 105+107) RECEIVED IT 3 MONTHS LATER. HE RETURNED IT TO ME WITHOUT COMMENT

I allege that Mr. John Gundry failed to file this grievance and protect my rights to seniority and tenure, and that he did so to conceal a conspiracy to commit fraud. He had known throughout that this was the actual cause of the dispute that Lorene Moore and others had conspired with the Edison Township Education Association to engage in an Americans with Disabilities Act dispute to disguise violation of "School Law", engage in an illegal suspension without pay or due process, and force an end to my employment. They also acted in this manner to attempt to damage my seniority and in

CONSTRUCT MY RIGHTS, BACKDATE FIRING AND FRAUD MALICIOUSLY AND SEE PAGE BOTTOM

I ALSO ASKED FRED CIOCIOLA IF EDISON'S POSITION WAS STILL THE SAME. THAT I HAD REFUSED TO COME TO WORK. HE REPLIED THAT THEY HAD GIVEN THAT UP. THE GRIEVANCE FILED BY THE E.T.E.A. WOULD INDICATE THAT HE HAD MIS-STATED THE FACTS.



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effect nullify their actions in conspiring to defraud me of my proper place in seniority THAT BEGAN IN 1984. They had acted to conceal a conspiracy to defraud by conspiring to commit an additional act of fraud, WITH THE INTENT OF COERCING ME INTO RETIREMENT. THAT FRAUD WAS CONTINUED BY N.J.E.A PAID ATTORNEYS WHO REFUSED TO ACT, FILE ANY COMPLAINT OR ACTION IN ANY JURISDICTION TO RID A SUBDIVISION WITHOUT PAY OR DUE PROCESS.

Petitioner states that in attempting to accelerate my return to work, I frequently consulted with Mr. John Gundry, which resulted in the following excerpts from conversations. BY THE FALL OF 1992 I REALIZED THAT THE E.T.E.A. WAS NOT GOING TO DEFEND MY RIGHTS AND HAD NO RECORD OF PROTECTING MEMBERS.

That in instances where I stated to him that I had the intention of finding a private attorney, he acted to intimidate me stating "other teachers who have done that have lost and it cost them plenty". His statement should be viewed in the context that I had been suspended without pay or due process and damaged by N.J.E.A. attorneys who since September 2, 1992, had taken no action on my behalf and acted to obstruct any efforts on my part to make the true and correct charges in this matter. IN ANY AND EVERY INSTANCE THAT I MADE INQUIRIES TO N.J.E.A. PAID ATTORNEYS REGARDING SCHOOL LAW. REPRESENTATION BEFORE THE COMMISSIONER OF EDUCATION OR HARASSMENT THE REPLY WAS THAT ALL ISSUES WOULD BE ADDRESSED IN THE FEDERAL ACTION PREPARED BY MRS. NORTON.

That when I stopped to speak to Mr. Gundry on June 7, 1993, about arranging and accompanying me to examine my personnel file, WITH A SPECIFIC REQUEST TO SEE THE MEDICAL RECORDS + SICK DAY ACCUMULATION. we also had a discussion of events to that time. In that conversation, Mr. Gundry made the threat of intimidation that "If you foul the machine in Edison, you will be lucky to come out alive." He paused for my reaction and then stated, "You know, they will harass you to death...., like what they did to George Asprocolas." My reply was that I had apparently already fouled the political machine, that these people were criminals and that I

I DID NOT BOTHER TO REPORT THIS TO MRS. NORTON. AT THIS POINT IT WAS CLEAR THAT SHE WAS IGNORING ANYTHING I TOLD HER AND THINGS I DID TELL HER USUALLY UPSET HER. CONSIDERING HER PARTICIPATION IN CONCEALING CRIMINAL ACTIVITY I WOULD EXPECT HER TO BE UPSET.



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would do whatever I could do within the law to fight their actions. I then stated that if they could get away with the things they had done, like fixing Lorene Moore's act of perjury at unemployment, having the charges against the Washington National Insurance Company and VALIC suppressed at the New Jersey Division of Civil Rights, it was clear that someone more powerful than Dr. Kreskey was reaching outside Edison Township.

I also stated to Mr. Gundry that there was a burglary of my home, that the only thing I could find missing was my file labeled VALIC and they didn't get the papers they wanted anyway. I recall that I also asked him for a copy of our employment contract for the N.J.E.A. paid attorney, Mrs. Norton. At this meeting, I asked him for a copy of the Medical Benefit Plan booklet for Edison teachers, that my file labeled "Edison Insurance Benefits" had also disappeared at the same time the VALIC file was stolen.

I also stated that my phone credit card I.D. number had been "stolen" in September of 1992; and that calls had been made to New York, Georgia, The Dominican Republic and all over running up a $700.00 phone bill. His reply was the Lorene Moore had relatives in Georgia. I LATER DISCOVERED ANOTHER RELATED "COINCIDENCE" FROM THE PAPERS I RECEIVED FROM UNEMPLOYMENT INDICATE THAT L. MOORE WAS IN CHICAGO ON 10/27/92. ON 10/22/92, 8 CALLS WERE MADE FROM N.Y. TO CHICAGO, ALSO ON THAT DATE 15 CALLS WERE MADE FROM OR TO STONE MTN. GEORGIA.

I also stated that there were some unusual occurrences regarding my phone; people who told me they had tried to call me could not get through to me; that I had success contacting people



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from pay phones and some who had knowledge of what was going on in. Edison talked more openly when I told them I was at a pay phone. AND AS OF 6-7-94 I HAVE EXPERIENCED NUMEROUS OTHER INCIDENTS THAT INDICATE TAMPERING WITH MY PHONE AND E.T.E.A. FACULTY REPRESENTATIVES HAVE APPROACHED ME ON INFORMATION THAT COULD ONLY HAVE BEEN OBTAINED BY

I also said that in contacting a representative of the phone company, I was told that it was not unusual that when a legal tap was installed at the main office, that illegal ones were also connected. LATER I WAS TOLD BY THE PHONE COMPANY THAT IF IT WAS A MATTER WHERE THERE WAS CORRUPTION IN THE STATE GOVERNMENT THAT I COULD EXPECT THAT MY PHONE WAS

I also said that since The Washington National Insurance Company was involved, that they could simply claim that they were making a fraud investigation and use that as a means of obtaining a wire tap. Mr. Gundry replied "They wouldn't even have to bother, Kreskey is good buddies with Bill Bohn (a retired Middle School Administrator), and he's buddies with Barnes (Edison Township Chief of Police); they could have your phone tapped; they're all buddies. I ALSO DISCUSSED WASHINGTON NATIONAL'S INVOLVEMENT AGAIN ON APRIL 20, 1993 WITH MRS. NORTON STATING THAT THEY HAD RETALIATED AGAINST ME, AND A LIKE INTEREST WITH THE EDISON B.O.E. IN GETTING RID OF DESIRED PEOPLE AND THAT LIKE THE BOARD WOULD SAVE MONEY IF MY

As Petitioner, I allege that my rights continue to be violated in a pattern of ongoing discrimination stated here:

That in notifying me of Reduction-in-Force for the 1993-1994 school year, I was given 2 hours to make a written reply. I was informed by Mr. Cavanagh that I should not attend that meeting (See A-45 AND IN FACT COULD NOT HAVE REACHED EDISON IN TIME.

That in days following, the malicious charge of Failure to

Attend was entered before the Board by Dr. Joseph Kreskey and Lorene Moore, and the Board approved that charge. I was not in any way informed that the charge was entered or heard (See Doc. 28), AND AS PREVIOUSLY STATED FRED CIOCIOLA CALLED ME AS AGENT FOR THE ETEA. AND MIS-STATED THE FACTS; THAT THE E.T.E.A HAD FILED A GRIEVANCE BASED ON REDUCTION-IN-FORCE. IN THE PREVIOUS 6 YEARS NO ACTION WAS TAKEN ON THAT SUBJECT.

That I received no notice that I was rehired and assigned to the same position at Woodrow Wilson Middle School. THE BOARD TOOK THAT ACTION ON JUNE 10TH, 1993, FAILING TO NOTIFY ME OF THAT ACTION AND BY DOING SO ACTED IN VIOLATION OF N.J.S.A. 2C:33-4(d) BY ACTING TO PREVENT ANY MEDIATION OF ACCOMMODATION TO MY DISABILITY.

The Board refused to, in any way, mediate, discuss or allow my input on accommodation to my disability, AND ALLEGE THAT DR JOSEPH KRESKEY AND LORENE MOORE MADE A FALSE AND MALICIOUS STATEMENT BEFORE THE BOARD OF EDUCATION ON OR ABOUT APRIL 20TH AND DENIED MY RIGHT TO DUE PROCESS.

I was sent notice of rehiring dated August 11, 1993, signed by Lorene Moore, WHO HAD RESIGNED IN JULY OF 1993, AND I BELIEVE THAT HER NAME STAMP WAS IMPROPERLY APPLIED. MRS. NORTON AND I DISCUSS THIS ISSUE LATER. MRS. NORTON AGREED THAT DR. KRESKEY AND DR. CANNARO WOULD NOT SIGN BUT THEIR NAME STAMP WAS USED.

I continued to be barred from employment until October 15, 1993, when I returned to work, my pay was withheld from October 31 until November 9, 1993, AND THAT MRS. SHARON LYNCH NORTON TOOK AN ACTION TO END THAT SUSPENSION; HER INTENT BEING TO DAMAGE MY SENIORITY AND VACATE THE CRIMINAL FRAUD THAT BEGAN IN 1984. THAT IN NEGOTIATING THAT ENDED TO A ILLEGAL SUSPENSION WITHOUT PAY MRS. NORTON MADE THE (PAGE BOTTOM

Since my return to work, I have been harassed regularly and will supply names and specific dates in future charges or amendments. HARASSMENT HAS CONTINUED THRU SEPT. OF 1994 WHEN THE BOARD AGAIN TOOK ACTION TO BREACH MY CONTRACT AND HARASS ME BY DEDUCTING FROM MY PAY FOR SICK DAYS WHEN I HAD TAKEN NO DAYS

I further allege that the Edison Township Board of Education acted to remove sick days from my accumulation so as to create a cost saving in the event that I would become ill or be suspended for reasons of health and in doing so, violated N.J.S.A. 18A:30-2. AND AGAIN STATE THAT THE BOARD HAS ACTED IN DISCRIMINATION, AND DENY ME A STATEMENT OF MY ACCUMULATED SICK LEAVE AND ALLEGE HARASSMENT CITING N.J.SA. 2C:33-4(d). AND AS OF JAN 1, 1995 THE BOARD HAS REPLACED STOLEN SICK DAYS BUT REFUSES TO ACCOUNT FOR MY ACCUMULATION.

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MADE THE MALICIOUS AND DAMAGING STATEMENT THAT I REQUIRED A SCHEDULE WHERE I TAUGHT NO MORE THAN 2 PERIODS IN A ROW. IT WAS HER INTENT TO ACT WITH THE BOARD OF EDUCATIONS AGENT DR. JOSEPH KRESKEY TO COERCE ME INTO ACCEPTING A 4/5 PART-TIME SCHEDULE WITH THE INTENT TO DAMAGE ME FINANCIAL AND VIOLATE MY RIGHTS UNDER N.J.SA. 18A:6-10. AT THE MEETING OF SEPT. 27, 1993 DR. JOSEPH KRESKEY PROPOSED A 4/5 PART TIME SCHEDULE BASED ON MRS. NORTON'S STATEMENT

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Petitioner states that I received no accounting of sick days for the 1992-1993 school year. In a recent conversation with an Edison High School staff member, I was informed that sick day statements were distributed days prior to the Christmas Holiday. I was not given an accounting or told they were available. FURTHER THE BOARD HAS ALSO FAILED TO GIVE ME THE DISTRICT PHONE DIRECTORY. I WOULD ATTRIBUTE THIS ACTION TO THEIR INTEREST IN ASSURING THAT I WOULD NOT BE ABLE TO INVESTIGATE TO DISCOVER OTHER LIKE INCIDENTS OF

Petitioner requests the assistance of the Commissioner in this matter. I believe the burden of accounting for sick days lies with the Board. I CAN PRODUCE DOCUMENTATION THAT IN REHIRING ME FOR THE 1992-1993 SCHOOL YEAR LORRAINE MOORE'S ACTIONS WERE TO CREDIT ME WITH 5 SICK DAYS AND VIOLATE 18A:30-2 N.J.S.A. WHICH STATES THAT I AM ENTITLED TO 10 SICK DAYS.

Petitioner states that filing of this petition has been precipitated by the following events:

The N.J.E.A. paid attorneys have throughout resisted any reasonable and timely action, AND SUBJECTED ME TO CRIMINAL HARASSMENT After 18 months of violation of my rights, they continue to threaten to obstruct my rights by filing an incomplete, inaccurate and maliciously constructed action in Federal Court. AND IN FACT FILED THAT ACTION . . . They have, as previously stated, answered a malicious prosecution ABUSE OF THE LEGAL PROCESS with a defense that damages me through venue and timeliness. DELAY. THEY HAVE REFUSED TO ASSIST ME IN FILING THE TRUE AND CORRECT CHARGES IN THIS MATTER IN REPEATED INSTANCES I HAVE REQUESTED THAT I BE ADVISED ON MATTERS THAT SHOULD HAVE BEEN BROUGHT BEFORE THE COMMISSIONER OF EDUCATION (AT PAGE BOTTOM)

That the Board has, through a ten-year period, arrived at a point where they departed for in 1984. FOR THE LAST 10 YEARS They have positioned themselves to end my employment through the R.I.F. Process

SEE PAGE A-96

THEY, MRS. NORTON AND MR. CAVANAGH HAVE REFUSED TO DISCUSS IN ANY REASONED MANNER THE ISSUES OF MY SICK DAYS. CERTIFICATE THE ACTIONS OF THE ATTORNEY STEPHEN KLAUSNER, VALIC, DR. BRUNS WASHINGTON NATIONAL, THE E.T.E.A OR UNEMPLOYMENT. IN ANY AND ALL CONVERSATIONS WHERE I REQUESTED CHARGES BE FILED I WAS TOLD THAT THEY WOULD BE INCLUDED IN THE FEDERAL ACTION THEY FILED. 20 MONTHS AFTER THE DISPUTE AROSE.



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Without just cause, hearing or notice to me, they reduced my pay by producing a suspension without pay AND WITHOUT DUE PROCESS. They have attempted to erase a 10-year conspiracy by a malicious misuse of Americans with Disabilities Act BY USING DISABILITIES THAT APPEARED ONLY AFTER THE CONSPIRACY BECAME IN EFFECT. My pay was reduced as of January 15, 1994, to the amount for 19 years longevity SEE A-97.

Failure to post my seniority in February most clearly exposes their intent in their actions. The explanation for delay was the "they forgot". The Board minutes of March 14, 1994, states my seniority as 19 years. In effect, 10 years of damaging me through fraud are erased. BY VIOLATING MY RIGHTS UNDER SCHOOL LAW, TPEL.A.A AND THE A.D.A IN CIRCUMSTANCES WHERE ATTORNEYS PAID BY THE N.J.E.A REFUSED TO ACT TO PROTECT MY RIGHTS UNDER ANY LAW.

The position of Mrs. Sharon Lynch Norton is that criminal acts, violations of state laws, theft by fraud and violations for the past ten years are not of consequence. N.J.E.A. paid attorneys have only the responsibility for returning a teacher to employment, not justice. AS OF MARCH 17, 1994 MRS. NORTON APPARENTLY CHANGED HER OPINION. IN A MEETING REQUESTED BY MRS. NORTON I STATED THAT "IT WAS CERTAINLY INTERESTING THAT AFTER 17 MONTHS THE E.T.E.A., THE BOARD, AND THE N.J.E.A. HAD WE EXACTLY WHERE THEY WANTED ME, THEY HAD CORRECTED A FRAUD AND CONSPIRACY TO OBSTRUCT MY RIGHTS BY THEIR ACTIONS DISMISSED ME A CIVIL SUIT, THEY HAD SUBJECTED ME TO 17 MONTHS OF HARASSMENT, DAMAGED ME FOR $75,000 DOLLARS, DAMAGED MY SENIORITY, REDUCED MY PAY AND ALLOWED ME TO BE SUBJECTED TO ANOTHER YEAR OF REDUCTION-IN-FORCE BASED ON FRAUD. I ALSO STATED THAT SINCE THE N.J.E.A. HAD DONE NOTHING TO PROTECT ME I WOULD HAVE TO SEEK PROTECTION UNDER CRIMINAL LAW (I HAD ONLY IN THE PREVIOUS WEEKS LOCATED N.J.SA 2C:28-4(d)) AND LATER ADDRESSED THE ISSUE OF NUMEROUS CRIMINAL ACTS.

IN REPLY MRS. NORTON BECAME VISIBLY FRIGHTENED AND STATED TO ME "IF YOU TURN ON ME I COULD BE IMPLICATED IN CONSPIRACY TO OBSTRUCT AND RACKATEERING", THIS WOULD APPEAR TO BE A RARE OCCURANCE WHERE MRS. NORTON WAS ABLE TO CORRECTLY INTERPRET THE LAW AND RECOGNIZE CRIMINAL VIOLATION OF MY RIGHTS. AS OF JAN. 1, 1995 MY EXPERIENCE HAS BEEN CONSISTENTLY CONFIRMED THAT THE CONSPIRING PARTIES HAVE PROVED TO IMMUNE UNDER CIVIL AND CRIMINAL LAW. THEY HAVE BEEN ABLE TO INFLUENCE AND CORRUPT VIRTUALLY EVERY JURISDICTION I HAVE BEEN ABLE TO APPROACH.

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This is not a dispute about my abilities as a teacher. My disability is a weapon maliciously used to violate my rights, concealing discrimination and conspiracy that began in 1984. The common element throughout is the cost of insuring the Petitioner, discrimination based on statistics and invasion of privacy. Financial benefit by ending Petitioner's employment would accrue to the Township of Edison Board of Education and the Washington National Insurance Company.

The Petitioner's rights have been violated, continue to be violated and, as a handicapped individual, I have been told that nothing can be done. It has been my experience throughout that criminal and civil violations of law cannot be reported. I have been told repeatedly that I need an attorney. If I interpret the facts in this matter, I would conclude that after being robbed of my rights by conspiracy, robbed of my income by conspiracy, robbed of my peace of mind by conspiracy over a 10 year period, that I, or other handicapped people, ~~should be forced~~ SUFFER A SERIOUS INJUSTICE AND ARE REQUIRED to pay an attorney to report being robbed by conspiracy. SUBJECTED TO CRIMINAL HARASSMENT, FRAUD, THEFT AND INVASION OF PRIVACY.

AS OF JUNE 6, 1994 I HAVE NO ATTORNEY AND NO EXPECTATION THAT I WILL FIND A ATTORNEY. IT HAS BEEN MY EXPERIENCE THROUGHOUT THAT CIVIL ATTORNEYS DO NOT PROSECUTE CRIMINALS AND THAT THEY WILL NOT REPRESENT WHEN N.J.E.A. PAID ATTORNEYS HAVE ACTED TO SUBJECT ME TO CRIMINAL HARASSMENT.

I HAVE SPENT OVER $1000.00 ON CONSULTATIONS WITH ATTORNEYS AND INTEND TO CONTINUE THAT SEARCH. AND AS OF JAN 1, 1995 I CAN FIND NO PRIVATE LEGAL REPRESENTATION. THE BOARD AND E.E.A. HAVE CONTINUED TO VIOLATE MY RIGHTS, AND AS IN AUGUST OF 1992 THESE ACTIONS TO VIOLATE MY RIGHTS CONSTITUTE NOT ONLY HARASSMENT BUT ACTIONS DONE WITH THE SPECIFIC INTENT OF COERCING ME TO ACCEPT LEGAL REPRESENTATION THRU THE N.J.E.A.



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WHEREFORE, petitioner requests that the Commissioner act to investigate this matter and act to assist Petitioner in ending ongoing violations of his rights.

That the Commissioner instruct Petitioner on means of advancing this dispute to a proper venue where criminal violations and punitive damages can be adjudicated.

That the Commissioner give consideration to motions for stays and petition for emergent relief.

That Commissioner grant whatever assistance and advice is proper to Petitioner, who is without legal representation or help in this matter.

9504370063 8

Edward Russell

Date MAY 13, 1994

SINCE THAT TIME I HAVE CONTINUED TO SEEK A JURISDICTION THAT HAS AUTHORITY IN THIS MATTER. MY EXPERIENCE BEING THAT WHEN A INDIVIDUALS RIGHTS ARE SERIOUSLY VIOLATED OVER A TEN YEAR PERIOD HE HAS NO RIGHT TO DUE PROCESS IN ANY JURISDICTION.

Edward Russell JAN. 9, 1995

**PETITION FOR EMERGENT RELIEF**

**AND REQUEST FOR STAYS OF ACTION**

**Petitioner, Edward Renaud, requests the following actions as emergent relief:**

**1) That the Commissioner act to investigate in this dispute. Petitioner has acted in his own behalf until this time.**

**2) That following investigation by the Commissioner, that sanctions be invoked to stay the course of action by the Respondentr.**

**3) That where proper, the Commissioner grant assistance and advice to the Petitioner as to the proper method and venue for charging all additional parties who have acted in discrimination and conspiracy.**

**4) That this petition be brought before the proper authorities with or without amendments as the Petitioner has alleged criminal violations of State and Federal Laws.**

**5) That some reasoned means be used to protect Petitioner from further harassment, retaliation, intimidation and obstruction of his rights.**

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6) That Respondent, The Edison Township Board of Education, be stayed from it's most recent act of retaliation, which is to subject the Petitioner to Reduction in Force. Petitioner believes that I have substantially supported the position that respondent has seriously misused this process since 1984 as a means of violating and obstructing my rights.

7) That Petitioner be immediately awarded the following amounts: $58,979.00 as pay withheld without due process from Sept. 1 to July 3, 1993. $1,547.30 as pay withheld without due process from Sept. 1 to Sept. 9, 1991, during which time Mr. Donald Flor as agent for the Board, successfully coerced me into accepting a 4/5 contract by misstating my seniority and improperly reducing my pay by $10,672.00, FOR A TOTAL OF $71,198.80 AND INTEREST. THIS IS NOT A CIVIL DISPUTE BUT ONGOING CONSPIRACY, FRAUD AND RACKATEERING, MY LOSSES IN THIS MATTER ARE THE RESULT OF CRIMINAL OFFENSES.

8) That the Commissioner examine the certifications of all personnel teaching in Industrial Technology.

9) That the Commissioner act to examine and correct the seniority list used by the Edison Township Board of Education and Edison Township Education Association.

10) That the Board and it's agents be stayed from further acts of harassment by failure to discipline students who are disruptive, act in an unsafe manner or who endanger themselves and others in Industrial Technology classes.

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11) That through the E.T.E.A., the N.J.E.A. paid attorneys be stayed from entering complaints relating to this matter as Petitioner alleges that these attorneys have engaged in a malicious misuse of process. AND CONSPIRACY TO OBSTRUCT.

12) That a reasoned means be found to allow Petitioner time to find a pharmacy and physician that he can trust. I CONTINUE TO OBTAIN MEDICATION FROM THE MIDDLETOWN PHARMACY BUT MY PRESCRIPTION FOR MEDICATION FOR DIABETES WILL BECOME A PROBLEM. WITHIN (SEE 12 CONT.)

13) That the Edison Township Education Association, The Board of Education and New Jersey Education Association be stayed from using their agents, The Washington National Insurance Company and Connecticut General Insurance Company from any present invasions of privacy, investigations and malicious charges of insurance fraud as Petitioner has had documents withheld from him by Washington National without explanation, and this method is a commonly used method to defame policy holders in cases of disputes or litigation. AND STATE THAT I DISCUSSED THIS ISSUE WITH MRS. NORTON AT A MEETING IN HER OFFICE ON TUESDAY, APRIL 20, 1993 STATING TO HER THAT "IF THERE ARE INVESTIGATIONS FRAUD THEY SHOULD INVESTIGATE EDISON'S ACTIONS." SHE MADE NO REPLY.

14) As Petitioner, I believe I have substantiated that ten years of discrimination have passed and that continuation of these acts would allow irreparable harm to be done. Petitioner's life has been and continues to be disrupted; I am being overwhelmed by the need to defend my rights on a daily basis.

12. CONT. THE MONTH. I WILL NOT SUBJECT MYSELF TO FURTHER HARASSMENT FROM DR. ANTONY BRUNO. IF MY EXPERIENCE WITH ATTORNEYS IS A INDICATOR OF PROFESSIONAL COURTESY AS PRACTICED IN NEW JERSEY I WILL BE UNABLE TO FIND A PHYSICIAN AS STATED I WAS DIAGNOSED DIABETIC IN 1991 MY EXPERIENCE AT THAT TIME WAS THAT I BECAME PROGRESSIVELY WEAKER FROM MAY UNTIL JUN WHEN I FIRST OBTAINED TREATMENT. I AM UNDER EXTREME DURESS. AS OF AUGUST OF 1994 I LOCATED ANOTHER PHYSICIAN AND MY "PREDICTION" IN APRIL PROVED CORRECT, THERE CONTINUES TO BE PROBLEMS OF INVASION OF PRIVACY AND A SOCIAL RELATIONSHIP BETWEEN THIS NEW DOCTOR AND THE OWNERS OF THE MIDDLETOWN PHARMACY. A CONSPIRACY IN OBSTRUCTING MY RIGHTS. ER. JAN. 1995

(61)

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Edward Renaud, of full age being duly sworn upon his or oath according to law deposes and says:

1. I am the petitioner in the forgoing matter.

2. I have read the petition and aver the facts contained therin are true to the best of my knowledge and belief.

Edward H. Renaud

Sworn and subscribed to me before this
13 day of May, 1994

Dorathea L. Hand

MAY 13 1994

DORATHEA L. HAND
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 27, 1998

I WILL WITHOUT QUESTION SWEAR TO ANY AND ALL CHANGES I HAVE MADE; THIS IS THE FIRST TIME THAT I HAVE BEEN ABLE TO COMPLETE A FIRST EDITING OF THIS DOCUMENT. MY DISABILITY LIMITS THE TIME SPAN THAT I CAN READ, COMPREHEND, AND EDIT SUCH A LENGTHY DOCUMENT. IT IS MY MOST SERIOUS CONCERN THAT I ACHIEVE SAME MEASURE OF PROTECTION FROM HARASSMENT WHICH IS A CRIMINAL OFFENSE UNDER N.J.SA. 2C:33-4 (d). I INTEND TO FILE ADDITIONAL COMPLAINTS IN EVERY VENUE THAT IS AVAILABLE. I HAVE REFUSED TO BE PARTY TO THE COMPLAINT FILED BY THE N.J.EA. PAID ATTORNEY SHARON LYNCH NORTON WHO IN FILING A COMPLAINT IN FEDERAL COURT ACTED TO OBSTRUCT MY RIGHTS AND ENGAGED IN CRIMINAL HARASSMENT, AND FOR THE 14 MONTHS PRIOR TO FILING THAT SUIT ALLOWED ME TO BE SUBJECTED TO COERCION, HARASSMENT AND CRIMINAL CONSPIRACY TO ASSURE THAT I WOULD BE COERCED IN TO SILENCE IN ALL RELATED MATTERS.

Edward H. Renaud Jr.
EDWARD H. RENAUD JR. 62

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CONTINUATION OF PART 2
PAGES A1 THRU A 98

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IT IS EVIDENT BY THE ACTIONS OF THE ATTORNEYS PAID TO PROTECT MY RIGHTS THROUGHOUT THIS DISPUTE THAT THEIR INTEREST WAS TO PROTECT THE EDISON TOWNSHIP EDUCATION, THE EDISON TOWNSHIP BOARD OF EDUCATION AND ADDITONAL CONSPIRING PARTIES FROM CIVIL AND CRIMINAL PENALTIES. IN THE RARE INSTANCES WHERE I WAS ALLOWED I PRESENTED THESE ATTORNEYS WITH DOCUMENTS, QUESTIONED THEIR ACTIONS TO CAUSE DELAY PRODUCED BRIEFS ON SIGNIFICANT POINTS OF LAW AND PLEADED FOR ASSISTANCE. IN RETURN THEY MALICOUSLY MISUSED THE LEGAL PROCESS TO CONCEAL THE ACTIONS OF THE BOARD AND E.T.E.A. DATING TO 1984, THE YEAR THAT THESE TWO PARTIES ACTED TOGETHER TO OBSTRUCT MY RIGHTS UNDER TITLE IBA AND THE N.J. LAW AGAINST DISCRIMINATION.

FOR 20 MONTHS I EXPERIENCED A INVERSE RELATIONSHIP WITH THE LAW; AS I SUPPLIED DOCUMENTS, DESCRIBED THE CONSPIRING PARTIES, AND DEMONSTRATED TESTIMONY I WOULD MAKE, IN RESPONSE THE N.J.E.A. PAID ATTORNEYS FOUND CAUSE FOR DELAY, ALLOWED HARASSMENT, RETRIBUTION AND COERCION TO CONTINUE. THEY LOOKED TO DAMAGE ME EMOTIONALLY AND FINANCIALLY. THEY BLOCKED ANY COURSE OF ACTION I ATTEMPTED TO TAKE TO PROTECT MY RIGHTS, AND BY THEIR ACTIONS TO DAMAGE ME THEY PROTECTED THEMSELVES.

UNDER NO CIRCUMSTANCES WILL I ACCEPT FURTHER INTERFERENCE WITH MY RIGHTS BY ATTORNEYS PAID FOR OR ASSOCIATED WITH THE N.J.E.A. OR OTHER CONSPIRING PARTIES.

BY CONTACTING A LARGE NUMBER OF ATTORNEYS I FOUND THAT THEIR WAS A UNSTATED REASON FOR THEIR REFUSAL TO REPRESENT ME IN ANY JURISDICTION, THEY RECOGNIZED CRIMINAL ACTIVITY, CORRUPTION IN THE STATE AND FEDERAL GOVERNMENT, CONSPIRACY, VIOLATIONS OF MY RIGHTS TO DUE PROCESS AND A COVER UP BY THE ATTORNEYS CLAIMING TO REPRESENT ME. THEY DIVIDED IN TO TWO CATEGORIES, THOSE WHO WOULD REPRESENT ME AND CONCEAL CONSPIRACY, OR THOSE WHO FOUND A REASON TO NOT REPRESENT ME.



P50437006644

Barbara Gallery, M.D.
Diplomate/Clinical Director
Michael S. Gallery, M.D., D.A.
Diplomate/Associate Director

September 2, 1992

Lenore W. Moore, Director of Personnel
Public Schools of Edison Township
100 Municipal Boulevard
Edison, NJ 08817

VIA FAX #908-287-4915

Re: EDWARD RENAUD

Dear Ms. Moore:

Mr. Edward Renaud has been under my care for treatment of narcolepsy since November 1984. As you know, Mr. Renaud's medical condition, called narcolepsy, is a disability. However, with reasonable accommodations, Mr. Renaud functions very well. He has, as I am sure you are aware, done an outstanding job as a high school teacher when his schedule allowed him to take regularly scheduled breaks with naps. It is absolutely necessary that Mr. Renaud be allowed to continue to have the same accommodations as he had in the past so that he can continue to perform his teaching duties.

If Mr. Renaud cannot take frequent regular breaks with naps, he will fall asleep at inappropriate times, and when he tries to avoid this, he will develop automatic behavior. This could be dangerous to himself and possibly others. I have insisted that Mr. Renaud not return to work until his previous working conditions have been reinstated because I am concerned for his health and safety.

Sincerely,

June M. Fry, M.D., Ph.D.
Director
Sleep Disorders Center

JMF/gls

THIS LETTER WAS DEMANDED BY L. MOORE IN HER FALSE CLAIM THAT NO DOCUMENTATION OF MY DISABILITIES EXISTED.

MEDICAL COLLEGE HOSPITALS

Department of Neurology

Main Clinical Campus

3300 Henry Avenue
Philadelphia, PA 19129
Telephone (215) 843-4350

June M. Fry, M.D., Ph.D.
Director
Mark A. DiPhillips, D.O., F.
Technical Director and
Clinical Coordinator
Lawrence W. Stern, M.D.
Research Clinical Director
Rochelle Goldberg, M.D.
Clinical Neurology Clinical Director
Michael S. Goldman, M.D., Ph.D.
Clinical Laboratory Director

November 11, 1992

Loren W. Moore, Director of Personnel
Public Schools of Edison Township
100 Municipal Boulevard
Edison, NJ 08817

RE: Edward Renaud

Dear Ms. Moore,

As you know Mr. Edward Renaud is under my care for treatment of narcolepsy. As I mentioned in my previous letter his narcolepsy is a handicap but with reasonable accommodations Mr. Renaud is able to function quite well. His ability to function includes the fact that he is very familiar with the course work that he has developed and taught over the past several years. A change in his schedule with new courses that he has never taught before would result in a stress that would adversely affect his health. At this time it would be too strenuous and difficult for him to learn new courses and develop new course material. If Mr. Renaud continues to teach the same courses under his previous working conditions with the reasonable accommodations that he requires, he will be able to continue to perform the required duties.

Sincerely,

June M. Fry, M.D., Ph.D.
Director

JMF/cpm

0502437003346

THIS LETTER WAS A RESPONSE TO A DEMAND BY THE N.J.E.A. PAID ATTORNEY STEPHEN KLAUSNER. IT IS NOTABLE THAT:

(1) MR. KLAUSNER DEMANDED THIS LETTER. WOULD NOT EXPLAIN WHY, OR WHAT THE CONTENT SHOULD BE. I ALLEGE THAT IT'S PURPOSES WERE TO CAUSE DELAY. (HARASSMENT)

(2) THAT DR. FRY HAD TO CALL HIM ON MY REQUEST,

(3). ALLEGE THAT MR. KLAUSNER'S INTENT WAS TO ATTEMPT TO DAMAGE ME BY OBTAINING A LETTER STATING THAT I COULD NOT LEARN TO TEACH NEW COURSES; I CAN WITH ACCOMMODATION + ADEQUATE TIME

(4) MR. KLAUSNER'S ADDITIONAL INTEREST WAS, AS A CONSPIRING PARTY TO CAUSE DELAY, COERCE ME TO ACCEPT A FRAUDULENT SCHEDULE AND OBSTRUCT MY RIGHTS UNDER SCHOOL LAW."

COLLEGE
OF PENNSYLVANIA

DOCUMENT 3

Main Clinical Campus

2200 Henry Avenue
Philadelphia, PA 19129
Telephone (215) 843-4220

June M. Fry, M.D., Ph.D.
Director
Mark A. DiPhilippo, R.Psg.T.
Technical Director and
Clinical Coordinator
Barbette Goldberg, M.D.
Cardiopulmonary Clinical Director
Judit A. Mendell, Ph.D.
Pediatric Clinical Psychologist

August 20, 1993

**RE: Edward Renaud**

**To Whom It May Concern,**

As I have stated in my previous letters, Mr. Edward Renaud has been under my care for treatment of narcolepsy since November 1984. Narcolepsy is a medical condition that results in a disability. The symptoms of narcolepsy are variable and the individual patient is the best judge of how disabling these symptoms are. Thus the patient should request the necessary accommodations. Although the symptoms are lifelong and never disappear, the severity may vary in a cyclic manner, is very much influenced by the patient's schedule and can be made worse by stress. In addition to narcolepsy Mr. Renaud also has diabetes and hypertension. These other medical conditions also require a regular schedule of daily activities, especially sleeping and eating and are made worse by stress. Prior to September 1992 when my recommendations for Mr. Renaud's treatment were being followed by extending him cost-free accommodations, Mr. Renaud was able to function very well and did an outstanding job as a high school teacher. His schedule allowed him to take regularly scheduled breaks with naps. As you are probably aware, in September 1992 I insisted that Mr. Renaud not return to work because he was transferred to a different school. In addition to the fact that he would not be able to maintain the necessary schedule, a change in his environment with new courses would create stress that would adversely affect his health and his three medical conditions. It is essential that Mr. Renaud have a very regular, consistent schedule and teach no more than three consecutive 42 minute periods which must be followed by a free 42 minute period during which time he must take a nap. In addition, because of the diabetes it is essential that he have a regular eating schedule. Having the familiarity of his surroundings, his teaching duties, procedures, equipment, and staff are extremely important for his ability to deal with his disabilities and effectively carry out his responsibilities. Mr. Renaud's previous schedule at Edison High School allowed him this accommodation and should be reinstated. Mr. Renaud's condition has not changed since September 1992 when I wrote a similar letter with the same request. When Mr. Renaud is reinstated I would like to medically approve the accommodations for the sake of his health and safety. If any additional information is required please do not hesitate to make such a request.

Sincerely yours,

June M. Fry, M.D.

June M. Fry, M.D., Ph.D.
Director

JMF/cpm

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THIS IS A DISPUTE THAT IS ENTIRELY THE CREATION OF THE EDISON TOWNSHIP EDUCATION ASSOCIATION AND THE BOARD OF EDUCATION; IT IS NOT A MATTER OF FAILURE TO ACCOMMODATE MY DISABILITY. THE INTENT OF THEIR ACTIONS WAS TO USE THE DISABILITIES NARCOLEPSY AND DIABETES AS A MEANS OF COERCING ME TO END MY EMPLOYMENT. AS STATED HERE AND THROUGHOUT THE ORIGINAL AFFADAVIT AND ANNOTATIONS; ENDING MY EMPLOYMENT WOULD SERVE THE SPECIFIC PURPOSE OF CONCEALING CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS THAT ORIGINATED IN 1984, THE THEFT OF ACCUMULATED SICK DAYS FROM MY ACCOUNT IN FOLLOWING YEARS, THE USE OF A FRAUDULENT SENIORITY LIST TO SUBJECT ME TO REDUCTION IN FORCE, AND THE PLACING OF A LIMIT ON MY HEALTH CARE COSTS.

THE ACTIONS OF THE BOARD AND E.T.E.A. AS CONSPIRING PARTIES WERE MALICIOUS AND INTENTIONAL, DISCRIMINATION BY THESE TWO PARTIES IS ECONOMIC DISCRIMINATION. BASED ON REAL AND ANTICIPATED INSURANCE COSTS. THE DIAGNOSIS OF NARCOLEPSY WAS NOT MADE UNTIL AFTER THE E.T.E.A. GRIEVANCE CHAIRPERSON LAWRENCE WHITE MADE THE FRAUDULENT STATEMENT TO ME IN 1984 THAT MY SENIORITY WOULD BE REDUCED BY ONE POSITION. I CAN SUPPORT WITH DOCUMENTATION THAT DISCRIMINATION, CONSPIRACY AND FRAUD WERE THE RESULT OF MY HAVING BEEN DIAGNOSED AND TREATED FOR CANCER IN 1979. FOR THE 1992-1993 SCHOOL YEAR THE BOARD AND E.T.E.A. USED THE DISABILITIES I DEVELOPED AFTER DISCRIMINATION BEGAN IN 1984 AS A MEANS OF OBSTRUCTING MY RIGHT TO EMPLOYMENT, AND AS A MOTIVE FOR ENDING MY EMPLOYMENT

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① SEE LETTER OF Nov. 27, 1994 TO ROBERT W. GLUCK, MIDDLESEX COUNTY PROSECUTOR. IN REPLY I HAVE BEEN TOLD THAT THERE HAVE BEEN NO CRIMINAL VIOLATIONS IN THIS MATTER. I STRONGLY DISAGREE WITH THAT DECISION. IT IS CONSISTENT WITH MY EXPERIENCE THROUGHOUT THIS DISPUTE; THAT THE PARTIES INVOLVED HAVE ENGAGED IN CONSPIRACY, A SERIOUS OFFENSE, AND APPARANTLY TOO SERIOUS TO BE-REPORTED OR PROSECUTED.

② IN EACH YEAR SINCE 1984 I HAVE BEEN SUBJECTED TO REDUCTION-IN-FORCE. THE ACTIONS OF LORRIE MOORE IN AUG. 1992 PROVIDE A EXPLANATION OF THE USE OF A FRAUDULENT SENIORITY LIST TO JUSTIFY REDUCTION IN FORCE. LORRIE MOORE IN HER POSITION AS PERSONELL DIRECTOR STATED TO ME THAT I WAS "REHIRED" IN AUGUST OF 1992, MORE THAN 30 DAYS AFTER MY CONTRACT HAD EXPIRED ON JUNE 30, 1992. BY FRAUDULENTLY SUBJECTING ME TO R.I.F. EVERY YEAR SINCE 1984 THE BOARD CREATED A WINDOW OF OPPORTUNITY TO BREACH MY EMPLOYMENT CONTRACT AND DELAY MY REHIRING FOR MORE THAN 30 DAYS. THERE INTEREST HAS BEEN TO ASSURE THAT I WOULD NOT BE ABLE TO ELECT LIFETIME CONTINUATION OF MY MEDICAL BENEFITS IN THE EVENT THAT I HAD BECOME TOTALLY DISABLED, AS N.J.S.A 17B:27-51.12 ALLOWS. THE BOARD AND E.T.E.A. HAVE CONNECTED A CRIMINAL FRAUD REGARDING MY POSITION IN SENIORITY WITH A FRAUDULENT USE OF THE REDUCTION-IN-FORCE PROCESS TO ATTEMPT TO DEFRAUD ME OF MY EMPLOYMENT AND MY HEALTH BENEFITS, AGAIN, A MATTER OF ECONOMIC DISCRIMINATION.

0504370006449

Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718
908 495-2531

To: ROBERT W. GLUCK

MIDDLESEX COUNTY PROSECUTOR
P.O. Box 71
NEW BRUNSWICK, N.J. 08903

Date NOV. 27, 1994



I AM ADDRESSING THIS COMPLAINT TO YOUR OFFICE ON REFERRAL BY THE ATTORNEY GENERAL'S OFFICE OF THE STATE OF NEW JERSEY.

SINCE 1984 THE EDISON TOWNSHIP BOARD OF EDUCATION AND THE EDISON TOWNSHIP EDUCATION ASSOCIATION HAVE ENGAGED IN A CONSPIRACY TO OBSTRUCT MY AGENT TO EMPLOYMENT AS A TENURED TEACHER IN THE EDISON SCHOOL SYSTEM. THE MOTIVE FOR THEIR ACTION IN 1984 IS ECONOMIC DISCRIMINATION; IN 1984 THE BOARD BECAME A "SELF-INSURED ENTITY BY ENTERING A INSURANCE RISK GROUP. SINCE 1984 THEY HAVE ENGAGED IN CONSPIRACY AND FRAUD CONSISTING OF ESTABLISHING AND USING A FRAUDULENT SENIORITY LIST TO ANNUALLY SUBJECT ME TO REDUCTION-IN-FORCE. THE FRAUD REGARDING MY SENIORITY CONSISTS OF ① GIVING PREFERENCE IN EMPLOYMENT TO "TEACHERS" WHO ARE NOT PROPERLY CERTIFIED AND HAVE NO SENIORITY. ② IMPROPERLY STATING THE SENIORITY POSITION OF A CERTIFIED TEACHER, Mr. RALPH VENTOLA; IN APRIL OF 1984 A REPRESENTATIVE OF THE E.T.E.A. INFORMED ME THAT HE WAS ENTITLED TO VETERANS SENIORITY UNDER N.J.S.A. 18A:28-12 WHICH WAS NOT ENACTED UNTIL A YEAR LATER AND IS NOT RETROACTIVE TO MR. VENTOLA'S DATE OF HIRE WHICH WAS SEPT. OF 1974.

SINCE 1984 THEY HAVE ENGAGED IN A COURSE OF ACTION TO "CORRECT" THAT FRAUD BY MAKING FURTHER MIS-REPRESENTATIONS REGARDING MY SENIORITY, USING A FRAUDULENT SENIORITY LIST TO COERCE ME INTO ACCEPTING PART TIME POSITIONS (AND FOR REDUCED PAY AND SENIORITY) BY REDUCING ME TO PART-TIME STATUS THEY ALTERED INTENTIONALLY TO REDUCE MY SENIORITY BY INCREMENTS



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SO THAT MR. VENTOLA'S SENIORITY WOULD EVENTUALLY SURPASS MINE; I WAS HIRED IN FEBRUARY OF 1974, MORE THAN SIX MONTHS BEFORE MR. VENTOLA. IN SUMMARY: THE BOARD OF EDUCATION HAS PURSUED A COURSE OF ACTION SINCE 1984 TO CONCEAL A CRIMINAL FRAUD, CORRECT THAT FRAUD BY BREACHING MY EMPLOYMENT CONTRACT AND REPEATEDLY ATTEMPTING TO COERCE ME TO END MY EMPLOYMENT BY USE OF "REDUCTION IN FORCE". IN ANY INSTANCE WHERE I BROUGHT QUESTIONS BEFORE REPRESENTATIVES OF THE E.T.E.A. I RECEIVED RESPONSES THAT SUPPORTED THE BOARD'S ACTIONS.

OF PARTICULAR NOTE IS THAT IN 1984, AS PART OF THE DISCUSSION OF THE ANNUAL REDUCTION-IN-FORCE MY IMMEDIATE SUPERVISOR MR. JOHN COE INFORMED ME THAT THE DEPUTY SUPERINTENDENT OF SCHOOLS, DR. JOSEPH KRESKEY HAD EXPRESSED HIS INTENTION TO HIRE OUT OF THE LINE OF SENIORITY AND END MY EMPLOYMENT. MR. COE LATER SHOWED ME A COPY OF A LETTER ADDRESSED TO DR. KRESKEY IN WHICH HE DEFENDED MY RIGHT BY SENIORITY TO EMPLOYMENT AND STATED THAT HE CONSIDERED ME TO BE A SUPERIOR TEACHER. AS I RECALL MR COE GAVE ME A COPY OF THAT LETTER WHICH HE LATER ASKED ME TO DESTROY STATING THAT HE HAD BEEN SEVERELY REPRIMANDED BY DR. KRESKEY FOR DEFENDING MY RIGHTS. I LATER DESTROYED THE LETTER REGARDING IT AS A PASSED MATTER; EVENTS OF THE PAST 2½ YEARS CAUSED ME TO RECALL EVENTS DATING TO 1984.

AGAIN, THE BASIS OF THIS COMPLAINT IS THAT SINCE 1984 THE BOARD'S EMPLOYEES AND E.T.E.A. HAVE CONSPIRED TO OBSTRUCT MY RIGHTS UNDER THE N.J. LAW AGAINST DISCRIMINATION, TITLE 18A, SCHOOL LAW AND THE AMERICANS WITH DISABILITIES ACT.

RATHER THAN REWRITE MY PREVIOUS EFFORTS AT DEFENDING MY RIGHTS I AM SUPPLYING YOU WITH A COPY OF A FILING I SUBMITTED BEFORE THE



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COMMISSIONER OF EDUCATION IN A ATTEMPT TO END CRIMINAL HARASSMENT, COERCION, FRAUD, THEFT BY FRAUD, THEFT BY WITHOLDING, INVASION OF PRIVACY WITH CRIMINAL INTENT, AND A LENGTHY LIST OF CRIMES COMMITTED TO CONCEAL CONSPIRACY EXISTING SINCE 1984. THE COMMISSIONER'S OFFICE REJECTED THE PETITION EXCLUSIVELY ON THE ISSUE OF TIMELINESS AND REFERRED ME TO THE STATE ATTORNEY GENERAL'S OFFICE WHICH DIRECTED ME TO YOU. I CAN ASSURE YOU THAT THE EFFORTS OF THE BOARD OF EDUCATION, THE E.T.E.A, AND ATTORNEYS PAID BY THE N.J.E.A. HAVE BEEN TO SUPPORT, CONCEAL AND ENGAGE IN A ONGOING CONSPIRACY TO OBSTRUCT MY RIGHTS.

I AM, IN THIS LETTER REQUESTING INVESTIGATION AND PROSECUTION OF THE INDIVIDUALS AND ENTITIES WHO HAVE INVOLVED THEM SELVES IN WHAT HAS BEEN STATED TO ME AS CONSPIRACY, RACKATEERING AND. FRAUD. EQUAL PROTECTION UNDER THE LAW HAS BEEN UNAVAILABLE WHILE THE ATTORNEY'S PAID BY THE N.J.E.A. HAVE ATTEMPTED TO PASS OFF CRIMINAL ACTIVITY AS CIVIL VIOLATIONS. THEY HAVE CONSISTENTLY IGNORED MY DEMANDS THAT THE CORRECT CHARGES BE MADE IN CIVIL OR CRIMINAL JURISDICTIONS; THEIR INTEREST HAS BEEN TO CONCEAL AND PARTICIPATE IN DELAY SO AS TO COERCE ME TO CONCEALING CRIMINAL ACTIVITY THAT CONTINUES UNTIL THE PRESENT.

I EXPECT THAT I WILL BE GIVEN THE OPPORTUNITY TO PRESENT ADDITIONAL DOCUMENTS AND STATEMENTS REGARDING THE ACTIONS OF ADDITIONAL INDIVIDUALS AND ENTITIES WHO HAVE ACTED IN PARTY TO CONSPIRACY. THE MATERIAL I HAVE SUBMITTED IS NOT BY ANY MEASURE THE COMPLETE DOCUMENTATION OR TESTIMONY THAT I WILL MAKE. I AM REQUESTING EQUAL PROTECTION UNDER THE LAW IN A SITUATION WHERE I HAVE HAD VERY LITTLE ASSISTANCE FROM THE E.T.E.A. AND N.J.E.A. WHO HAVE A CONTRACTUAL



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OBLIGATION TO PROTECT MY RIGHTS. AND REFUSED TO ACT.
My KNOWLEDGE OF CRIMINAL LAW IS LIMITED; I WOULD EXPECT TO BE MAKING THE CHARGES OF, BUT NOT LIMITED TO:

, RACKATEERING, WITH DR. JOSEPH KRESKEY AS A LEADER OF ORGANIZED CRIME. SINCE 1984.
CONSPIRACY - REGARDING DR. J. KRESKEY, LORENE MORCE, JOHN GARDY E.T.E.A. PRESIDENT; MR. STEPHEN KLAUSNER, MRS. SHARON LYNCH NORTON, AND MR. THOMAS CALLAHAN. (N.J.E.A AND ATTORNEYS.) DR. VILLANUEVA DE CASTRO. (THE BOARD'S CHIEF MEDICAL INSPECTOR) THE MIDDLETOWN PHARMACY, THE WASHINGTON NATIONAL INSURANCE CO.
CRIMINAL COERCION - REGARDING MR. DONALD FIORE'S THREAT IN SEPT. OF 1992 TO INVADE THE PRIVACY OF MY MEDICAL RECORDS AS A MEANS OF GETTING RID OF ME; MR. FIORE'S USE OF A FRAUDULENT SENIORITY LIST TO COERCE ME INTO ACCEPTING A PART-TIME 4/5 TEACHING POSITION FOR THE 1991-1992 SCHOOL YEAR.
THEFT BY FRAUD - IN WITHHOLDING MY SALARY BY BARRING ME FROM EMPLOYMENT FOR THE 1991-1992 UNTIL I AGREED TO ACCEPT A PART-TIME POSITION. AND ALLOCATING A REDUCTION OF MY SALARY ON THE BASIS OF MY "SENIORITY"; THEFT BY FRAUD IN MIS-REPRESENTING THE STATUS OF EMPLOYMENT FOR THE 1992-1993 SCHOOL YEAR. THAT I WAS A 'SUBSTITUTE' TEACHER FOR THE MONTHS OF SEPT. AND OCT. AND BREAKING MY CONTRACT TO COERCE ME TO ACCEPT A PART-TIME POSITION.

AND ADDITIONAL COUNTS OF: RECKLESS ENDANGERMENT, CRIMINAL HARASSMENT, CRIMINAL COERCION, THEFT, FRAUDULENT USE OF MY SIGNATURE, THEFT BY DECEPTION, OFFERING A FALSE INSTRUMENT FOR FILING, FALSIFYING OR TAMPERING WITH RECORDS, OFFICIAL MISCONDUCT AND TERRORISTIC THREATS.



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~~AND LEGAL RESPONSIBILITY TO PROTECT MY RIGHTS.~~

TO UPDATE DOCUMENTATION OF THE BOARD AND E.T.E.A.'S ACTIONS:

AS OF 9-14-94 THE BOARD OF EDUCATION ACTED TO FALSIFY MY PAYROLL/EMPLOYMENT RECORD BY MAKING A ABSENT DEDUCTION IN THE AMOUNT OF $913.35 (A ADDITIONAL COUNT OF THEFT BY WITHOLDING) WHEN I HAD NOT BEEN ABSENT ANY DAYS. THEY APPARENTLY HAD MULTIPLE OBSECTIVES IN MAKING THIS DEDUCTION: (SEE COPY OF CHECK, FOLLOWING PAGE)

1. THEY WOULD USE THIS FALSIFICATION TO JUSTIFY THE CLAIM THAT I WAS A PART-TIME TEACHER AND NOT ENTITLED TO A SENIORITY PAY BASE AND TO ILLEGALLY REDUCE MY ALLOTMENT OF SICK DAYS AS THEY HAD IN PREVIOUS YEARS. THE BOARD AND E.T.E.A. HAVE "NEGOTIATED" A CONTRACT FOR THIS.
2. WHEN I FILED A GRIEVANCE TO OBTAIN THE $913.35 REMOVED FROM MY PAYCHECK. THE GRIEVANCE CHAIRPERSON FOR THE E.T.E.A., MR. FRED COCHIA REFUSED TO FILE THE GRIEVANCE THAT I FILED AND EDITED MY GRIEVANCE TO CONCEAL THE BOARD'S 10TH CONSECUTIVE YEAR OF ATTEMPTING TO BREACH MY EMPLOYMENT CONTRACT. AS PART OF MR. COCHIA'S ACTIONS HE STATED THAT IT WAS HIS INTENT TO VIOLATE MY RIGHT TO THE GRIEVANCE PROCESS AND STATED THAT HE WOULD SEND THE GRIEVANCE TO THE N.J.E.A. AND ATTORNEY STEPHEN KLAUSNER TO TAKE LEGAL ACTION AGAINST THE BOARD. THIS IS THE SAME ATTORNEY WHO WAS PARTY TO THE BOARD'S ACTIONS IN 1992 WHEN THE BOARD SUSPENDED ME WITHOUT PAY OR DUE PROCESS. TO COERCE ME TO END MY EMPLOYMENT. MR. KLAUSNER HAD SUPPORTED LORRAINE MOORE'S FALSE CLAIM THAT AS A "SUBSTITUTE" I WAS NOT ENTITLED TO PENSION, SENIORITY RIGHTS, OR PAYMENT FOR THE TIME I WAS SUSPENDED WITHOUT DUE PROCESS DATING FROM SEPT. 1, 1992. IN EFFECT MY TENURE RIGHTS HAD BEEN ENDED, AND AS WOULD FOLLOW IN THE LAW I WOULD HAVE NO RIGHT



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TO ELECT TO CONTINUE MY MEDICAL BENEFITS AS A DISABLED PERSON OR A DISABILITY PENSION. . MR. KLAUSNER, AT A MEETING OF OCT. 28, 1992 ALSO SUPPORTED LORENE MOORE'S ACTIONS DOCUMENTED IN HER LETTER OF OCT. 15, 1992 WHERE SHE PURPOSELY MISREPRESENTS THE LAW CITING N.J.S.A. 18A:16-2. MR. KLAUSNER STATED TO ME THAT THE BOARD HAD THE RIGHT TO HAVE ME EXAMINED BY THE BOARD'S CHIEF MEDICAL INSPECTOR. THIS WAS NOT STATED AS PART OF THE REGULAR DISCOURSE AT THAT MEETING BUT IN A LOW VOICE DIRECTED SOLELY TO ME. I STRONGLY SUSPECT THAT THIS MEETING WAS RECORDED AND MR. KLAUSNERS INTEREST WAS TO CONCEAL HIS PARTICIPATION IN CONSPIRACY AND COERCION. MR. KLAUSNERS INTERESTS WERE TO PROTECT THE E.T.E.A WHO WERE AND ARE PARTY TO OBSTRUCTING MY RIGHTS. AND CONCEALING A CRIMINAL FRAUD. (SEE COPY OF LETTER ON THE FOLLOWING PAGE)

ADDRESSING A CURRENT ISSUE; AT A UNEMPLOYMENT BENEFIT APPEALS HEARING OF NOV. 21, 1994 ON A CLAIM OF JUNE 28, 1992 MR. RONALD GITTER, APPEALS EXAMINER:

1. FALSIFIED THE RECORD STATING THAT THE REASON THAT THE PREVIOUS HEARING WAS POSTPONED WAS THAT THE BOARD OF EDUCATION RECEIVED NO NOTICE OF THE HEARING. AND APPEALED THE BOARD OF REVIEW'S DECISION. IN FACT THE PREVIOUS HEARING WAS SCHEDULED FOR JULY 29, 1994 AND THE BOARD REFUSED TO APPEAR STATING "THAT THE BOARD WANTED THE OPPORTUNITY TO RETAIN A ATTORNEY." AT THE HEARING OF NOV. 21, 1992 NO EMPLOYEE OF THE BOARD APPEARED OR DID THEY HAVE A ATTORNEY REPRESENT THEM. (OFFICIAL MISCONDUCT).
2. MR. GITTER ENGAGED IN OFFICIAL MISCONDUCT, A CRIMINAL OFFENSE IN THAT HE INSISTED THAT MR. DON UHLIG OF DSJ ASSOCIATES 241-245 HALEDON AVENUE, HALEDON, NEW JERSEY 07508 BE ALLOWED TO QUESTION ME ON THE BASIS OF DOCUMENTS THAT I TESTIFIED WERE FRAUDULENT AND HAD BEEN SUBMITTED BY MR. UHLIG



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Public Schools of Edison Township

100 Municipal Boulevard • Edison, New Jersey 08817

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RONALD R. CASTALDO
ASSISTANT SUPERINTENDENT

DR. JOSEPH A. MURPHY
SUPERINTENDENT

DANIEL P. MICHALD
BUSINESS ADMINISTRATOR/BOARD SECRETARY

October 15, 1992

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

My reason for this correspondence is two-fold. First in my letter date( September 15, 1992, I informed you of the accomodation that th( administration will make in order to accomodate your disability. To dat( we've had no response from you in reference to this matter. (1)

NOT ONLY WAS CIVIL LAW VIOLATED BUT THIS IS PART OF THE FRAUD REGARDING INSURANCE

In order for us to be assured that our classroom is staffed and t( determine whether or not we need to make further arrangements with ou substitute, you as asked to respond in writing by October 22, 1992, as t( your plans.

(2) Second, I have been informed by the district's Chief Medical Inspector, Dr. De Castro, that before you can enter the classroom, you must schedul( an appointment to come to her office for a physical examination.* Thi request was triggered when I sent a copy of your doctor's note to he office for verification of diagnosis.

She has, also, requested that you bring with you a list of medication that you are presently taking.

Please contact her for an appointment as soon as possible. In the event that I may be of further assistance, please do not hesitate to contact me.

Sincerely,

Lorene W Moore

LORENE W. MOORE.
Director of Personnel

LWM/jm

(2) *N.J.S.A. 18A:16-2 DOES NOT ALIGN A PERSONNEL DIRECTOR OR DOCTOR TO BAR A EMPLOYEE FROM EMPLOYMENT. N.J.S.A. 18A:16-3 ALLOWS A EMPLOYEE TO BE EXAMINED BY THEIR OWN DOCTOR. WHILE OTHER CHARGES MIGHT BE MADE CONSPIRACY TO OBSTRUCT AND OFFICIAL MISCONDUCT, N.J.S.A. 2C:30-2 ARE ALLEGED, AND THE FEDERAL OFFENSE OF MAIL FRAUD

cc: D. Flor
J. Gundry



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ON DEC. 4, 1992. THE ONLY HEARING WHERE THE BOARD SENT A EMPLOYEE. THE HEARING OF NOV. 21, 1992 WAS SCHEDULED FOR THE ISSUE OF "AVAILABLE FOR WORK", A ISSUE WHERE THE BOARD HAS NO STANDING IN DECIDING THAT ISSUE.

3. IN TWO INSTANCES MR. GITTER WENT "OFF THE RECORD", ROSE FROM BEHIND HIS DESK AND RAISED HIS VOICE THREATENING ME THAT IF I DID NOT ANSWER MR. UHLIG'S QUESTIONS IN A WAY THAT MR. UHLIG AND MR. GITTER LIKED THAT I WOULD BE PENALIZED. BOTH MR. GITTER AND MR. UHLIG DEMONSTRATED THEIR INTEREST IN THIS MATTER; IN INSTANCES WHEN I STATED THE FACTS REGARDING THE BOARD AND E.T.E.A.'s ACTIONS SINCE 1984 TO OBSTRUCT MY RIGHTS EITHER MR. GITTER INTERRUPTED MY REPLY OR ASSISTED MR. UHLIG IN INTERRUPTING MY TESTIMONY.

4. MR. GITTER ALSO STATED THAT AS A APPEALS EXAMINER IT WAS NOT HIS CONCERN THAT THE BOARD'S EMPLOYEE HAD MADE FRAUDULENT STATEMENTS IN REPLY TO A PHONE CALL OF 10/27/92; THAT THE BOARD'S REPRESENTATIVE, MR. UHLIG HAD SUBMITTED FRAUDULENT DOCUMENTS AT THE HEARING OF DEC. 4, 1992; AND THAT THE RECORD WOULD STAND OF THAT HEARING OF DEC. 4. 1992.

5. MR. GITTER AGAIN STATED AS HE HAD IN REGARD TO THE HEARINGS OF JULY 22 1994 AND NOV. 21, 1994 THAT I COULD NOT SUBPOENA ANY DOCUMENTS OR WITNESSES, THAT I WOULD HAVE TO APPEAR AT HEARINGS TO FIND OUT WHETHER EDISON WOULD APPEAR AND THEN REQUEST SUBPOENAS.

6. AS STATED IN THE AFFADAVIT (PETITION) ENCLOSED. THE COPIES OF THE TAPES I RECEIVED FROM THE STATE OF NEW JERSEY ARE NOT THE ACCURATE RECORD OF THE HEARING OF DEC. 4, 1994. THEY HAVE BEEN EDITED TO MOVE A ACT OF PERJURY BY LORENE MOORE TO A PORTION OF THE TAPE WHERE IN THAT PORTION IT IS NO LONGER PERJURY. REMOVED FROM THAT TAPE



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IS MR. GITTER'S STATEMENT THAT THERE WOULD BE NO INVESTIGATION OF THE ISSUES BY THE DEPT. OF LABOR AND HIS STATEMENT THAT HIS RULING WOULD BE BASED ON THE CREDIBILITY OF THE WITNESSES.

7. AT THE HEARING OF NOV. 21, 1994 MR. GITTER STATED THAT MR. UHLIG IN REPRESENTING THE BOARD (THE FIRST TIME ANY BOARD REPRESENTATIVE HAS APPEARED IN NEARLY 2 YEARS) HAD NO RESPONSIBILITY TO ANSWER QUESTIONS OR MAKE AN TESTIMONY UNDER OATH.

8. MR. GITTER, AT THE HEARING OF NOV. 21, 1994 ALLOWED MR. UHLIG TO ENTER A CLOSING STATEMENT BASED ON DOCUMENTS THAT I HAD STATED WERE FRAUD. IN MR. UHLIG'S STATEMENTS HE REQUESTED THAT THE BOARD FIND ON THE BASIS OF FRAUDULENT DOCUMENTS THAT HE SUBMITTED AND THAT I BE HELD INELIGIBLE FOR BENEFITS.

REGARDING MR. GITTER, I ALLEGE OFFICIAL MISCONDUCT, CRIMINAL COERCION, DESTRUCTION OF SWORN TESTIMONY, CONSPIRACY, FASIFYING OR TAMPERING WITH RECORDS.

REGARDING MR. UHLIG. I ALLEGE CONSPIRACY, OFFERING A FALSE INSTRUMENT FOR FILING. AND IN THE HEARING OF DEC. 9, 1992 MR. UHLIG ATTEMPTS TO CONCEAL A FRAUDULENT DOCUMENT (LETTER, SEE PAGE 83) AND RESISTS ENTERING IT IN TO THE RECORD. MR UHLIG ALSO INSTRUCTS MRS. MOORE TO FALSIFY THE RECORD IN READING MY LETTER OF AUGUST 1ST, 1992 IN TO THE RECORD, AT THE DEC. 9.

AND IN REGARD TO THE ALTERATION OF THE TAPES OF THE HEARING OF DEC. 2, 1092; I NOTIFIED THE ATTORNEY'S MR. THOMAS CARRAGHER AND SHARON LYNCH MORTON THAT THE TAPES HAD BEEN ALTERED IN MARCH OF 1993. THEY REFUSED TO DISCUSS THE ISSUE APPARENTLY CHOOSING TO CONCEAL CRIMINAL ACTIVITY TO PROTECT THE CONSPIRING PARTIES.

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REGARDING MR. GUNDRY, PRESIDENT OF THE E.T.E.A. WHO MADE THE THREAT THAT I WOULD BE HARASSED TO DEATH; SINCE THAT TIME MR. GUNDRY AND THE "POLITICAL MACHINE IN EDISON HAVE ACTED TO CARRY OUT THAT THREAT AND SPREAD CONSPIRACY TO CARRY IT OUT. IN THE FRAMEWORK OF HARASSMENT TO CARRY OUT THAT THREAT MADE ON JUNE 7, OF 1993 WOULD INCLUDE:

— WASHINGTON NATIONAL'S DESTRUCTION OF CLAIM FORMS FILED BY MY PHYSICIAN. DR. ANTHONY SPINO IN MAY OF 1993

— THE REFUSAL OF DR ANTHONY SPINO TO COMPLETE CLAIM FORMS TO HARASS ME AND APPARENTLY TO COERCE ME IN TO ACCEPTING A PART-TIME SCHEDULE, FROM JUNE OF 1993.

— THE BOARD OF EDUCATIONS REFUSAL TO MEDIATE ACCOMMODATION FOR THE 1993-1994 SCHOOL YEAR AND SUSPENDING ME WITHOUT PAY OR DUE PROCESS UNTIL OCT. 15, 1992.

— THE BARD'S WITHOLDING MY PAY UNTIL NOV. 1, 1993 AND MY PRESCRIPTION INSURANCE CARD UNTIL THAT DATE.

— ON MY RETURN TO EMPLOYMENT ON OCT. 13, 1993 A SCREENING DURING THREE DAYS OF TESTING WAS ARRANGED FOR ME BY THE EDISON HIGH SCHOOL VICE-PRINCIPAL MR. EDWARD SAMUDIANCE. WHICH DENIED ACCOMMODATION TO MY DISABILITY. THIS WAS DONE DESPITE THE ACTING SUPERINTENDENT DR. VINCENT CARROCCI'S DELAYING MY RETURN TO EMPLOYMENT A ADDITIONAL WEEK ON HIS STATEMENT THAT HE WOULD NEED THAT WEEK TO INFORM ALL OF THE PRINCIPALS AND VICE PRINCIPALS OF THE NEED TO ACCOMMODATE MY DISABILITIES.

— A MEDICAL BENEFITS STATEMENT FROM THE CIGNA INSURANCE COMPANY WITH THE DATE OF MEDICAL/DENTAL SERVICE ALTERED TO SEPT. 2, 1992. THAT DATE IS THE DATE OF A LETTER/COMPLAINT REQUESTING A SUBSTANTIAL WEIGHT REVIEW (INVESTIGATION) OF THE N.J. DIVISION OF CIVIL RIGHT'S INVESTIGATION OF MY COMPLAINT FILED IN FEB. 1992. BY THE PHILADELPHIA DISTRICT OFFICE OF THE E.E.O.C. THE MEDICAL/DENTAL CLAIM WAS OF THE DATE OF MAY 21, 1992. AT A HOSPITAL IN PHILADELPHIA. CIGNA IS "AGENT FOR" THE EDISON BOARD'S



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SELF INSURANCE PLAN.

- A THEFT OF MY CHECK BOOK FROM MY CAR WHICH IN THE EDISON HIGH SCHOOL PARKING LOT IN NOV. OF 1993 AND IT'S SUBSEQUENT RETURN TO MY VEHICLE WHILE IN THE PARKING LOT IN JUNE OF 1994.
- A THREAT MADE BY THE PRINCIPAL OF EDISON HIGH SCHOOL THAT IF I CRITICIZED (DOCUMENTED) HARASSMENT BY THE VICE PRINCIPAL MS. MARY ANN JONES THAT IT WOULD BE THE BASIS FOR EVALUATING MY TEACHING FOR THAT YEAR.
- AND AS PREVIOUSLY STATED: ON MY RETURN TO EMPLOYMENT IN SEPT. OF 1994 THE BOARD OF EDUCATION DEDUCTED $913.35 FROM MY PAYCHECK WHEN I WAS ABSENT NO DAYS DURING THAT PERIOD.
- A INCIDENT IN APRIL OF 1994 WHERE THE RIVERVIEW MEDICAL CENTER CLAIMED TO HAVE NO RECORD OF A BILL THAT I HAD PAID IN FULL REQUIRING ME TO RE-DOCUMENT THAT PAYMENT.
- AN ADDITIONAL AND HARRASSING RELATED EVENT IN WHICH A VIAL OF BLOOD WAS REMOVED FROM MY BODY BY A NURSE, CAROLYN, IN THE EMPLOY OF DR. CHAFKIN OF MIDDLETOWN, N.J.. DR. CHAFKIN WAS A DOCTOR I CHOSE TO REPLACE DR. BRUNO WHO HAD REFUSED TO FILL OUT MY DISABILITY CLAIM FORM FOR THE N.J.E.A ENDORSED INSURER. WASHINGTON NATIONAL. DR. BRUNO, AS STATED IN THE ENCLOSED AFFADAVIT ATTEMPTED TO HAVE ME FILE A CLAIM FORM THAT CONTAINED THE STATEMENT THAT I WAS INCOMPETENT. AGAIN THERE ARE ADDITIONAL ELEMENTS OF THE CONSPIRACY PRESENT; UPON DR. CHAFKIN'S REQUEST THAT I OBTAIN MY MEDICAL RECORDS FROM DR. BRUNO THERE OCCURED A UNUSUAL SERIES OF EVENTS; I CALLED DR. BRUNO'S OFFICE TO REQUEST MY RECORDS AND DID NOT STATE WHO WAS TO RECEIVE THEM; WHEN I CALLED APPROXIMATELY A WEEK LATER. I WAS INFORMED BY HIS SECRETARY THAT THEY WOULD BE SENT TO DR. CHAFKIN. THE ONLY REASONED EXPLANATION IS A ADDITIONAL INVASION OF MY PRIVACY; SOMEHOW DR. BRUNO'S SECRETARY KNEW WHERE TO SEND THEM.



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IN REVIEWING THE RECORD; MIS-HANDLING OF MY MEDICAL RECORDS, A UNAUTHORIZED INVASION OF MY BODY, A UNAUTHORIZED INQUIRY OF MY DOCTOR BY A EMPLOYEE OF THE BOARD IN SEPT. OF 1992, THE DISAPPEARANCE OF MY PRESCRIPTION MEDICATION IN SEPT. OF 1985 AND AGAIN IN OCTOBER OF 1992, MR. FOX'S THREAT CONVEYED BY JOHN GUNDY THAT THEY WOULD LOOK IN TO MY MEDICAL RECORDS, A SUBSEQUENT ILLEGAL DEMAND THAT I BE EXAMINED BY THE BOARD'S DOCTOR AND HER REFUSAL TO ISSUE ANY FINDING WOULD CIRCUMSTANTIALLY CONFIRM CONSPIRACY. AS PART OF THE LARGER CONSPIRACY TO OBSTRUCT MY RIGHTS IT WOULD APPEAR TO CONFIRM CONSPIRACY, AND ONE CENTERING AROUND MY MEDICAL CARE AND HEALTH INSURANCE.

AS STATED I WOULD APPRECIATE MEETING WITH YOU AS SOON AS POSSIBLE; THE THREAT TO HOGTIE ME TO DEATH HAS PROVED VIABLE. I EXPECT THAT I WILL ADD TESTIMONY, DOCUMENTS AND SPECIFIC INFORMATION SUPPORT THE CHARGES STATED HERE. MY EXPERIENCE HAS BEEN THAT HARASSMENT HAS BECOME THE COMMON ELEMENT OF MY MEDICAL CARE AND CONSUMED MY LIFE FOR THE PAST 2½ YEARS. IF MY EXPERIENCE IS A INDICATOR HARASSMENT AND RETALIATION WILL INEVITABLY FOLLOW AIMED AT DAMAGING MY HEALTH AND EMPLOYMENT. AS EARLY AS MARCH OF 1993 I STATED IN WRITING TO THE ATTORNEYS SHARON LYNCH NORTON AND THOMAS CAVANAGH THAT I WOULD NOT BE PARTY TO CONCEALING "CIVIL VIOLATIONS". IN RESPONSE, AS I INVESTIGATED MY DOCUMENTS AND READ THE LAW I SUPPLIED THE RESULTS OF RESEARCH TO THEM WHICH THEY IGNORED; IT MAY BE MORE CORRECT TO STATE THAT I ENJOYED A INVERSE RELATIONSHIP WITH THE LAW. I WOULD HOPE THAT INVESTIGATION AND PROSECUTION OF THE PARTIES INVOLED THRU YOUR OFFICE WILL ALLOW ME EQUAL PROTECTION UNDER THE LAW.

SINCERELY

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EDWARD REXFORD.

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IN MY INVESTIGATING THE EDISON TOWNSHIP BOARD OF EDUCATION'S REASON FOR ADVERSE ACTION I LOOKED INTO MY MEDICAL RECORD'S DATING TO 1984, THE YEAR THAT THE BOARD HAD BECOME A MEMBER OF A INSURANCE RISK POOL AND DIRECTLY RESPONSIBLE FOR THE COST OF MY HEALTH CARE. I COULD RECALL A SPECIFIC INCIDENT, ONE IN 1985, STATED HERE:

COINCIDING WITH THE ONSET OF NARCOLEPSY IN 1985 I ALSO DEVELOPED PHYSICAL SYMPTOMS THAT COULD NOT BE ASSOCIATED WITH THAT NEUROLOGICAL PROBLEM. AS A RESULT MY PHYSICIAN DR ANTHONY BRUNO REFERRED ME TO THE LAHEY CLINIC IN BURLINGTON, MASS. FOR A 3 DAY INTENSIVE PHYSICAL THAT WOULD POSSIBLY PROVIDE A DIAGNOSIS AND COURSE OF TREATMENT FOR THE HEALTH PROBLEMS I WAS EXPERIENCING. IN JULY OF 1985 I TRAVELED TO THE LAHEY CLINIC FOR 3 DAYS OF TESTING. ON MY ARRIVAL I FOUND THAT I HAD ONE APPOINTMENT WITH ONE DOCTOR, NOT THE 3 DAYS OF TESTS AND CONSOLTATIONS WITH DOCTORS OF ALL AREAS OF MEDICINE I HAD EXPECTED. AS A RESULT I COMPLAINED TO THE CLINIC'S HOSPITAL OMBUDSMAN REGARDING THE LIMITED ATTENTION BEING PAID TO MY MEDICAL PROBLEMS, AND THAT I HAD WASTED MY TIME AND MONEY FLYING TO MASS. AND BOOKING A HOTEL ROOM FOR THREE DAYS. I WAS THEN ALLOWED TO SPEAK TO A NEUROLOGIST ON NARCOLEPSY, CONSULT WITH THE ONE CARDIOLOGIST WHO HAD EXAMINED ME THE NEXT DAY AND ARRANGED TO FLY HOME THE SAME DAY. IN LATER DISCUSSION WITH A PSYCHOLOGIST WHO I HAD CONSULTED HE INFORMED ME THAT HE HAD CONTACTED THE LAHEY CLINIC IN A SPECIFIC ATTEMPT TO HAVE ME EXAMINED THOROUGHLY DURING THOSE THREE DAYS. HE HAD ALSO CONTACTED DR. BRUNO, THE PHYSICIAN WHO HAD ORIGINALLY REFERRED ME TO THE

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LAHEY CLINIC AND THAT THEY HAD AGREED THAT DR. RUTAN, THE PSYCHOLOGIST, ADVOCATE FOR ME TO ATTEMPT TO ASSURE THAT I WAS PROPERLY EXAMINED. I HAD SEEN DR. RUTAN ON REQUEST OF MY WIFE WHO RECOGNIZED THAT MY BEING SO SERIOUSLY ILL WAS DAMAGING OUR MARRIAGE, THAT I WAS CONCERNED THAT I WOULD NOT BE ABLE TO CONTINUE WORKING, THAT AFTER YEARS OF GAINING JOB SECURITY I WAS AGAIN IN DANGER OF LOSING MY JOB TO REDUCTION-IN-FORCE AND THAT THESE CIRCUMSTANCES WERE DAMAGING MY MARRIAGE.

IN RETROSPECT I REALIZED THAT THE "$100,000" HEALTH INSURANCE POLICY THE BOARD OF EDUCATION PROVIDES FOR IN THE EMPLOYMENT CONTRACT HAD BEEN BREACHED, THAT A COST LIMIT HAD BEEN PLACED ON MY HEALTH CARE REDUCING 3 DAYS OF TESTS AND CONSULTATIONS TO ½ DAY OF TESTS AND ONE CONSULTATION. THE PHYSICAL SYMPTOMS I EXPERIENCED IN 1984 CONTINUED UNTIL JULY OF 1991 WHEN I WAS DIAGNOSED AND TREATED FOR DIABETES.

I HAD OFTEN RELATED THIS STORY CASUALLY TO FRIENDS AS A AN ANECDOTAL PART OF MY HEALTH CARE "STORY" IN THE CONTEXT THAT A DIAGNOSIS HAD SIMPLY BEEN MISSED. I HAD COMPLAINED OF SYMPTOMS OF DIABETES FROM 1984 THRU 1991 WHEN I HAD BECOME SO SERIOUSLY ILL THAT THE CORRECT DIAGNOSIS WAS MADE BY DR. BRUNO. DURING MS. SHARON LYNCH NORTON'S REPRESENTING ME IN WHAT SHE CLAIMED WAS A DUPUTE UNDER THE A.D.A. I TOLD HER THIS ANECDOTE AS PART OF MY HEALTH CARE HISTORY. IT WAS THE LOOK ON HER FACE THAT WAS ONE OF THE REASONS I INVESTIGATED MY MEDICAL RECORDS ON THIS ISSUE, IT FIT INTO THE CORRECT REASON FOR THE BOARD'S ADVERSE ACTIONS, THAT THE REAL ISSUE WAS NOT MY ABILITY TO TEACH WITH ACCOMMODATION OR THE BOARD'S ABILITY TO CONTINUE COST FREE ACCOMMODATION. THE ISSUE WAS REAL AND

9504370066 3

ANTICIPATED MEDICAL COSTS; THAT THE BOARD HAD PUT A LIMIT ON MY HEALTH CARE IN 1985. AS I HAD STATED TO MRS. NORTON AND OTHERS SINCE 1991 THAT I HAD WALKED AROUND FOR 6 YEARS AS A UNDIAGNOSED AND UN-TREATED DIABETIC, THAT AFTER TREATMENT BEGAN IN 1991 I FELT BETTER THAN I HAD IN YEARS, THAT PHYSICAL SYMPTOMS I HAD ASSOCIATED WITH NARCOLEPSY HAD DISAPPEARED, THAT MY LIFE HAD SIGNIFICANTLY IMPROVED.

IN RETROSPECT, THE BOARD'S ACTIONS TO LIMIT MY HEALTH CARE IN 1985 MAY HAVE BEEN THE CAUSE OF A MISSED DIAGNOSIS BY THE LAHEY CLINIC, AND AS A RESULT I HAD LIVED THE FOLLOWING SIX YEARS LIMITED BY UN-TREATED SYMPTOMS OF DIABETES. (MEDICAL RECORDS IN MY POSSESION: SUBSTANTIATE THIS.)

IN REVIEWING MY RECORDS THAT CONNECTICUT GENERAL INSURANCE COMPANY WOULD BE THE ONLY REASONED SOURCE OF INFORMATION ON WHICH EDISON COULD BASE THERE ACTIONS TO LIMIT MY HEALTH CARE IN 1986. AS PREVIOUSLY STATED CONNECTICUT GENERAL INSURANCE COMPANY IN 1984 BECAME "AGENT FOR" THE EDISON TOWNSHIP BOARD OF EDUCATION, AND IN THIS INSTANCE IT IMPLIES THAT AS "AGENT FOR" THEY HAVE PROVIDED INFORMATION ON WHICH THE BOARD AND E.T.E.A HAVE BASED THEIR ACTIONS TO DISCRIMINATE AGAINST ME AS A HANDICAPPED PERSON.

THERE ARE INSTANCES WHERE CONNECTICUT GENERAL INSURANCE COMPANY HAS PAID CLAIMS ONLY ON APPEAL IN MY RECORDS. BEYOND BEING A SOURCE OF INFORMATION AS THE BASIS FOR DISCRIMINATION IT APPEARS THAT CONNECTICUT GENERAL WAS WILLING TO ASSIST THE BOARD AGAIN IN OCT. OF 1993. SEE PAGE A-23



0504370004

THE FOLLOWING PAGES, A-25 THRU A-49

PROVIDE A CHRONOLOGICAL DOCUMENTATION OF THE ACTIONS OF THE BOARD OF EDUCATION. SINCE 1984 THEY HAD FRAUDULENTLY STATED MY SENIORITY, AND THEN IN FOLLOWING YEARS MADE ATTEMPTS TO "CORRECT" THAT FRAUD BY USING THAT LIST TO JUSTIFY TRANSFERS OUT OF CATEGORY, ASSIGNING ME TO PART-TIME POSITIONS TO "CORRECT" THE FRAUD, AND. FOR THE 1992-1993 SCHOOL YEAR TO A POSITION THAT FOR THE FIRST TWO MONTHS WAS THAT OF A SUBSTITUTE.

THESE PAGES ARE SUBMITTED WITH MY NOTES WRITTEN DIRECTLY ON THE DOCUMENTS. THEY CERTIFY: INTENT, A COURSE OF ACTION DATING FROM 1984, THAT ACTIONS OF THE BOARD BEGAN IN 1984 AND ARE BASED ON REAL AND ANTICIPATED INSURANCE COSTS, THAT THE BOARD HAS MIS-STATED MY SENIORITY BY ONE OR MORE POSITIONS SINCE 1984. THEN IN SEPTEMBER OF 1992 THE BOARD ACTED THRU THEIR PERSONNEL DIRECTOR LORENE MOORE TO END MY EMPLOYMENT IN CIRCUMSTANCES THAT WERE BASED ON FRAUD, DENIAL OF DUE PROCESS, MALICIOUS INTENT AND THE MOTIVE OF CONCEALING CONSPIRACY, DISCRIMINATION AND VIOLATIONS OF TITLE 18A, "SCHOOL LAW," AND THE LAW AGAINST DISCRIMINATION" DATING TO 1984.

ALSO INCLUDED IS DOCUMENTATION OF MY ATTEMPTS TO RETURN TO WORK THRU. ADMINISTRATIVE PROCEDURE THRU THE E.E.O.C, AND COPIES OF BOARD MINUTES DOCUMENTING THEIR ACTIONS TO ASSURE THAT I WOULD BE PUNITIVELY ASSIGNED TO A "SUBSTITUTE POSITON". THEIR MALICIOUS ACTIONS WERE TO CONSPIRE TO OBSTRUCT MY RIGHTS TO EMPLOYMENT, TO PENSION BENEFITS, DISABILITY INSURANCE HEALTH CARE INSURANCE AND LIFE INSURANCE. ALL OF THESE STEM FROM MY EMPLOYMENT OR TEACHERS ASSOCIATION MEMBERSHIP.



9504370065

# PUBLIC SCHOOLS OF EDISON TOWNSHIP

100 Municipal Boulevard • Edison, New Jersey 08817 • (201) 287-4400

CHARLES A. BOYLE
Superintendent

DR. JOSEPH A. [illegible]
Deputy Superintendent

JOHN C. THOMAS
Secretary Board of Ed. Affairs, Manager

June 21, 1984

Mr. Edward Renaud
Edison High School

Dear Mr. Renaud:

This is to inform you that you will be transferred for the 1984-85 school year as follows:

from: Industrial Arts - Edison High School

to: Industrial Arts - Edison High (.8)/J. P. Stevens (.1)/(.1) to be arranged through your supervisor (full-time total) (1)

Please contact your building principal at your earliest convenience to obtain further details about your assignment. Best wishes for a successful year.

Sincerely yours,

Thomas J. Bradshaw
Director of Personnel

TJB:bn

cc: L. Scanlon
H. Alley
D. Flor

#3203

(1) AS STATED IN 1984 BOARD SESSIONS "SELF INSURED. AND ET. EA. CONSPIRES WITH THE BOARD IN ESTABLISHING FRAUD REGARDING MY SENIORITY POSITION BEING A VETERAN. RALPH VENTOLA.

PRIOR TO THIS OFFER I WAS TOLD I WOULD BE A 9/10 PART-TIME TEACHER. THIS WAS A FIRST ATTEMPT TO "CORRECT" THE FRAUDULENT SENIORITY LIST BY REDUCING MY SENIORITY BY REDUCING ME TO A PART-TIME POSITION.

THE SENIORITY LIST USED IN INDUSTRIAL ARTS IN EDISON WAS THEN FRAUDULENT BY GRANTING RALPH VENTOLA 1 YEAR SENIORITY, BY EMPLOYING AND GRANTING PREFERENCE TO TEACHERS WHO ARE NOT CERTIFIED, AND MAY HAVE BEEN FRAUDULENT SINCE 1974, THE YEAR I WAS HIRED.

A-25

THE LETTER FROM THE PUBLIC SCHOOLS OF EDISON FOR THE 1985-1986 SCHOOL YEAR IS MISSING FROM MY RECORDS. FOR THAT YEAR I WAS ASSIGNED TO A OUT-OF-CERTIFICATE POSITION TEACHING IN-SCHOOL SUSPENSION AT J.P. STEVENS HIGH SCHOOL. THAT ASSIGNMENT WAS SIGNIFICANT IN THAT:

1. AS A OUT OF CERTIFICATE POSITION I WAS TOLD THAT I WOULD NOT ACCRUE SENIORITY. HAD THAT STATEMENT BEEN SUPPORTABLE THE FRAUD REGARDING MY SENIORITY FROM 1984 WOULD HAVE BEEN "CORRECTED".

2. CIRCUMSTANCES IMPLY THAT THE BOARD KNEW AND UNDERSTOOD THAT THIS WAS A PUNITIVE TRANSFER BASED ON A FRAUDULENT SENIORITY LIST.

3. ALSO IMPLIED IS THAT THE BOARD KNEW AND UNDERSTOOD THE EFFECTS OF NARCOLEPSY, THAT THIS WAS A BORING PAPERWORK POSITION, GENERALLY A STRESSFUL JOB WHERE I WOULD BE DEALING WITH DISCIPLINE PROBLEMS, AND WAS CONSIDERED A UN-DESIREABLE ASSIGNMENT. AS I RECALL, IN 1986 A TEACHER WHO WAS BEING TREATED FOR CANCER BY CHEMOTHERAPY WAS ASSIGNED TO TEACH IN-SCHOOL SUSPENSION RATHER THAN PROPERLY RETURNING HIM TO A TEACHING POSITION. I BELIEVE HE DIED LATER THAT YEAR.

9504370066?

# PUBLIC SCHOOLS OF EDISON TOWNSHIP

100 Municipal Boulevard • Edison, New Jersey 08817 • (201) 287-4400

CHARLES A. BOYLE
Superintendent

DR. JOSEPH A. TORNEY
Deputy Superintendent

JOHN C. THOMAS
Secretary Board of Ed. Affairs, Manager

May 1, 1986

To: Edward Renaud / JPS

From: Charles A. Boyle, Superintendent

Re: REDUCTION IN FORCE

At a special meeting held last evening, April 30, 1986, the Edison Township Board of Education determined that a substantial reduction in teaching staff was necessary. Where possible, positions of non-tenured teachers were eliminated, but the Board was forced to terminate also a substantial number of tenured staff members.

I regret to inform you that your tenured position was one of those affected for the 1986-87 school year, and that consequently the Board is not able at this time to offer you employment for the school year beginning on September 1, 1986.

NJSA 18A:28-11 requires that you be advised of your seniority status. In the table below, we have listed your years, months, and days of seniority in the appropriate category, and your ranking among those affected in terms of eligibility for rehiring.

| | SENIORITY | | | |
|---|---|---|---|---|
| Category | Years | Months | Days | Ranking |
| Industrial Arts | 12 | 4 | 12 | 2 (3) |

IN THIS YEAR I WAS LAST IN SENIORITY POSITION DUE TO FRAUD.

As provided in NJSA 18A:28-12, your name is being placed on a preferred eligible list for reemployment whenever a vacancy occurs in your area of service. There is no time limit on your position on this eligibility list and you will remain on said list until you are either reemployed or refuse a position offered to you.

[1]

The Board of Education sincerely regrets the necessity of eliminating your position, and looks forward to being able to offer you a position as soon as one becomes available.

CAB:bn

A/A27

[1] HERE THE LAW IS MIS-STATED: I WOULD BE CORRECTLY REHIRED TO ANY POSITION FOR WHICH I WAS QUALIFIED, NOT JUST IN MY AREA OF SERVICE. IT IS NOTABLE THAT TO INSURE MY POSITION AT THE BOTTOM OF THE SENIORITY LIST INDIVIDUALS WITHOUT PROPER CERTIFICATION WERE GIVEN PREFERENCE AND SENIORITY CREDIT IMPROPERLY.

A-27

9504370008

# PUBLIC SCHOOLS OF EDISON TOWNSHIP

100 Municipal Boulevard • Edison, New Jersey 08817 • (201) 287-4400

CHARLES A. BOYLE
Superintendent

DR. JOSEPH A. HERSHEY
Deputy Superintendent

JOHN C. THOMAS
Secretary-Board of Ed. Member


September 9, 1986

Mr. Edward Renaud
Herbert Hoover Middle School

Dear Mr. Renaud:

Pursuant to my conversation with you today, this is to notify you formally that your assignment will be revised during the period Wednesday, September 10, 1986 through Friday, October 3, 1986 as follows:

from: In-House Suspension - Edison High School

to: Industrial Arts - Herbert Hoover Middle School

Thank you for your cooperation in this matter.

Sincerely yours,

Charles A. Boyle
Superintendent

CAB:bn

cc: L. Scanlon
D. Robinson
D. Flor
Payroll

DOCUMENTS THAT FOR THE 1985-1986 SCHOOL YEAR THAT I WAS ASSIGNED TO IN-SCHOOL SUSPENSION. BASED ON THE USE OF THE FRAUDULENT SENIORITY LIST.

AS I RECALL I WAS TOLD THAT BECAUSE THIS POSITION WAS OUTSIDE THE CATEGORY OF MY CERTIFICATE THAT I WOULD NOT RECEIVE SENIORITY CREDIT WHICH PROVED TO BE FALSE

THIS IS A PARTICULARLY INTERESTING SITUATION IN THAT I WAS A CERTIFIED TEACHER "SUBSTITUTING" FOR A PERSON WHO I BELIEVE IS NOT CERTIFIED.

A-28

# PUBLIC SCHOOLS OF EDISON TOWNSHIP

100 Municipal Boulevard • Edison, New Jersey 08817 • (201) 287-4400

CHARLES A. BOYLE
Superintendent

DR. JOSEPH A. HERSHEY
Deputy Superintendent

JOHN C. THOMAS
Secretary Board of Ed. Affairs, Business

April 7, 1987

Mr. Edward Renaud
Edison High School

Dear Mr. Renaud:

This is to notify you formally that your assignment has been revised as follows:

from: Edison High School - Industrial Arts (.6)/In-House Suspension (.4)

to: Edison High School - Industrial Arts - full time

This assignment is retroactive to March 16, 1987 and will be effective through May 15, 1987, at least.

Your cooperation in accepting this assignment is appreciated.

Sincerely yours,

Charles A. Boyle
Superintendent

CAB:bn

cc: L. Scanlon
D. Flor
Payroll
File

THIS DOCUMENT SERVES TO INDICATE THAT I WAS "OUT OF CATEGORY" AND IN CATEGORY UNTIL MARCH 16, 1987. I WAS RETURNED TO THE IN-CATEGORY POSITION WHICH A INDIVIDUAL WHO HAD NO PERMANENT CERTIFICATION OCCUPIED, TO MY KNOWLEDGE THE PERSON I REPLACED HELD NO CERTIFICATION, HAD NO COLLEGE DEGREE WAS A CONVICTED FELON, AND HAD NO ENTITLEMENT TO PREFERENCE IN EMPLOYMENT OR SENIORITY.

A-29

950437006610

# PUBLIC SCHOOLS OF EDISON TOWNSHIP

100 Municipal Boulevard • Edison, New Jersey 08817 • (201) 287-4400

CHARLES A. BOYLE
Superintendent

DR. JOSEPH A. HENNESSY
Deputy Superintendent

JOHN C. THOMAS
Secretary-Board of Ed. Attorney

April 22, 1987

Mr. Edward Renaud
Edison High School

Dear Mr. Renaud:

At a regular meeting on APRIL 15, 1987, the Edison Township Board of Education determined that a reduction in teaching staff was necessary. Where possible, positions of non-tenured teachers were eliminated, but the BOE was forced to terminate a number of tenured staff members.

I regret to inform you that your tenured position was one of those affected for the 1987-88 school year - and that consequently the BOE is not able at this time to offer you employment for the school year beginning on SEPTEMBER 1, 1987.

NJSA 18A:28-11 requires that you be advised of your seniority status. In the table below, we have listed your years, months and days of seniority in the appropriate category, and your ranking among those affected in terms of eligibility for rehiring.

| | SENIORITY | | | |
|---|---|---|---|---|
| CATEGORY | Years | Months | Days | Ranking |
| INDUSTRIAL ARTS | 13 | 4 | 12 | 2 of 2 |

AGAIN, I AM RANKED AS LAST IN SENIORITY, ON THE RIF. LIST.

As provided in NJSA 18A:28-12, your name is being placed on a preferred eligible list for reemployment whenever a vacancy occurs in your area of service. There is no time limit on your position on this eligibility list and you will remain on said list until you are either reemployed or refuse a position offered to you.

The BOE sincerely regrets the necessity of eliminating your position, and looks forward to being able to offer you a position as soon as one becomes available.

Sincerely,

Charles A. Boyle

CHARLES A. BOYLE
Superintendent of Schools

CAB/gb

A-30

# PUBLIC SCHOOLS OF EDISON TOWNSHIP

100 Municipal Boulevard • Edison, New Jersey 08817 • (201) 287-4400

CHARLES A. BOYLE
Superintendent

DR. JOSEPH A. MURPHY
Deputy Superintendent

JOHN C. THOMAS
Secretary Board of Ed. Affairs, Trustees

June 15, 1988

Mr. Edward Renaud
Edison High School

Dear Mr. Renaud:

We are happy at this time to be able to reappoint you from the RIF list. Your assignment for the 1988-89 school year will be:

HERE I AM RETURNED TO EMPLOYMENT FROM R.I.F. PRIOR TO THE END OF SCHOOL

From: Industrial Arts - Edison High School

To: Industrial Arts - Edison High School

Please contact your building principal(s) at your earliest convenience to obtain further details about your assignment.

Best wishes for a successful school year.

Sincerely yours,

Charles A. Boyle
Superintendent

CAB:bn

cc: L. Scanlon
D. Flor
Payroll
L. Kagdis
File

5A21

A-31

# PUBLIC SCHOOLS OF EDISON TOWNSHIP

100 Municipal Boulevard • Edison, New Jersey 08817 • (201) 287-4400

CHARLES A. BOYLE
Superintendent

DR. JOSEPH A. HERNEY
Deputy Superintendent

H. ROBERT FOIT
Business Administrator/Board Secretary

April 12, 1991

Edward Renaud
Edison High School / J.P. Stevens H.S.

Dear Mr. Renaud:

At a special meeting on April 8, 1991, the Edison Township Board of Education determined that a reduction in teaching staff was necessary. Where possible, positions of non-tenured teachers were eliminated, but the BOE was forced to terminate a number of tenured staff members.

I regret to inform you that your tenured position was one of those affected for the 1991-92 school year - and that consequently the BOE is not able at this time to offer you employment for the school year beginning on September 1, 1991.

NJSA 18A:28-11 requires that you be advised of your seniority status. In the table below, we have listed your years, months and days of seniority in the appropriate category, and your ranking among those affected in terms of eligibility for rehiring.

| | SENIORITY | | | |
|---|---|---|---|---|
| | Years | Months | Days | Ranking |
| CATEGORY | | | | |
| Industrial Arts | 17 | 4 | 12 | 3rd of 3 |

As provided in NJSA 18A:28-12, your name is being placed on a preferred eligible list for reemployment whenever a vacancy occurs in your area of service. There is no time limit on your position on this eligibility list and you will remain on said list until you are either reemployed or refuse a position offered to you.

The BOE sincerely regrets the necessity of eliminating your position, and looks forward to being able to offer you a position as soon as one becomes available.

Sincerely,

RIFFED AGAIN BASED ON A FRAUDULENT SENIORITY LIST

MR. BOYLE RETIRES.

Charles A. Boyle
CHARLES A. BOYLE
Superintendent of Schools

CAB/jm

A-32

950437006/3

# PUBLIC SCHOOLS OF EDISON TOWNSHIP

100 Municipal Boulevard • Edison, New Jersey 08817 • (201) 287-4400

HERE AGAIN THE BREAK OF MY EMPLOYMENT IS BASED ON THE FRAUDULENT SENIORITY LIST AND INTENT IS DOCUMENTED. FROM THIS YEAR THE BOARD ALLOWED A POLICY OF BREACHING MY CONTRACT SO AS TO DIVIDE IT UP TO INCREMENTS THAT WOULD UNDER N.J.S.A. 17B:27-51.12. OR UNDER THE "COBRA" LAW BE SMALL ENOUGH THAT MY ELECTION OF CONTINUATION OF HEALTH BENEFITS WOULD BE PRECLUDED BY THE RESTRICTION THAT I BE CONTINUOUSLY EMPLOYED UNDER THE STATE LAW FOR 3 MONTHS (I BELIEVE THE COBRA LAW REQUIRES 6 MONTHS)

September 13, 1991

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

We are happy at this time to be able to reappoint you from the RIF (reduction in force) list. Your assignment for the 1991-92 school year will be:

FROM : I.A. (1.0) - Edison High School

TO : I.A. (.8) - Edison High School
Effective 9/11-12/31/91

Please contact your school principal(s) at your earlist convenience to discuss details pertaining to this assignment.

Best wishes for a successful school year.

Sincerely,

FOR THE 1991-1992 SCHOOL YEAR THE BOARD THROUGH MY SUPERVISOR CRIMINALLY COERCES ME TO ACCEPT A .8 PART TIME POSITION. BOARD IS AGAIN ATTACKING MY SENIORITY; THIS CORRELATES AS A ACTION TAKEN IN RESPONSE TO MY BEING DIAGNOSED AS DIABETIC IN JULY OF 1991.

JOSEPH A. KRESKEY
Superintendent of Schools

NOTABLY. DR. JOSEPH KRESKEY IS NOW PROMOTED TO SUPERINTENDENT. HE IS A CONSTANT ELEMENT; IN 1984 HE HAD EXPRESSED HIS INTENT TO MR. COE TO HIRE OUT OF THE SENIORITY LINE TO GET RID OF ME.

JAK/jm

cc: F. Cangelosi / D. Flor / Payroll / File

THEY HAD AGAIN USED THE FRAUDULENT SENIORITY LIST TO BREACH MY EMPLOYMENT, REDUCE MY PAY AND SENIORITY. THEY DEDUCTED THE PAY FOR THE DAYS I WAS BARRED FROM EMPLOYMENT FROM MY PAY. THE E.T.E.A. SUPPORTED THIS ACTION AS A CONSPIRING PARTY.



950437006114

# Public Schools of Edison Township

100 Municipal Boulevard • Edison, New Jersey 08817

Tel: (908) 287-4400 Fax: (908) 287-4055

RONALD R. CASTALDO
ASSISTANT SUPERINTENDENT

DR. JOSEPH A. MURPHY
SUPERINTENDENT

DANIEL P. MICHAUD
BUSINESS ADMINISTRATOR/BOARD SECRETARY


April 6, 1992

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

The Board of Education is presently reviewing the table of organization for school year 1992-93. Because the total number of positions available cannot be determined at this time due to staff members returning from various leaves of absences and enrollment trends, it may be necessary to terminate some individuals. Please be aware that this notice is being sent to all non-tenured staff members and some tenured staff members.

Therefore, in order for the Board to comply with the deadline established by New Jersey statutes and contractual notice requirements, I must inform you that your name will be given to the Board of Education to consider as a possible employee who will not be offered a renewal contract for the 1992-93 school year. This meeting will be held on Thursday, April 9, 1992 in the Superintendent's office in the Municipal Complex at 8:00 p.m. The Board plans to meet in Executive Session immediately after the public session to approve the list of professional staff members to be notified of non-renewal of contract.

You have a right to request that any such discussion and decision regarding your employment be made in public session rather than private session. If that is your intention, please notify this office and confirm in writing no later than 12:00 noon on April 8, 1992. If I do not hear from you, the discussion will be in private. Formal action will be taken at the regularly scheduled Board Meeting on Monday, April 13, 1992.

Sincerely,

Lorene W. Moore

LORENE W. MOORE
Director of Personnel

LWM/jm

AGAIN I AM SUBJECTED TO REDUCTION-IN-FORCE BASED ON A RENOVENT SENIORITY LIST.

THE R.I.F. LETTER THAT FOLLOWED IS NOTABLE IN TWO WAYS. IT VIOLATED N.J.S.A. 18A:28-11 IN THAT IT DID NOT STATE MY POSITION IN SENIORITY. THE ORIGINAL OF THAT LETTER, THE ONLY COPY I HAD WAS TAKEN FROM ME BY THE N.J.E.A. PAID ATTORNEY STEPHEN KLAUSNER AND NOT RETURNED TO ME. IT'S SIGNIFICANT IN THAT IT DEMONSTRATES THE BOARD'S AND E.T.E.A.'s INTENT TO OBSTRUCT MY RIGHT TO EMPLOYMENT BY FRAUD.




950437006175

# Public Schools of Edison Township

100 Municipal Boulevard • Edison, New Jersey 08817

Tel: (908) 287-4400 Fax: (908) 287-4955

RONALD R. CASTALDO
ASSISTANT SUPERINTENDENT

DR. JOSEPH A. KWIECIEN
SUPERINTENDENT

DANIEL P. MICHAUD
BUSINESS ADMINISTRATOR/BOARD SECRETARY


April 15, 1992

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

Because the total number of positions available cannot be determined at this time due to staff members returning from various leaves of absences and enrollment trends, you are hereby notified that at the regular meeting on April 13, 1992, the Edison Board of Education voted not to renew your contract for the 1992-93 school year.

Please be advised that the Board of Education has every intention of reappointing the majority of the riffed staff members by the May Board of Education Meeting. We will be in touch with you in the near future.

Sincerely,

Lorene W. Moore

HERE AGAIN SCHOOL LAW IS VIOLATED IN THAT THERE IS NO STATEMENT OF SENIORITY AS REQUIRED BY N.J.S.A. 18A:28-11 AS IT IS AGAIN IN THE RIF LETTER OF APRIL 30, 1993. AGAIN INTENT IN CONCEALING A FRAUDULENT SENIORITY LIST IS DOCUMENTED.

LORENE W. MOORE
Director of Personnel

LWM/jm

Public Schools of Edison Township
100 Municipal Boulevard, Edison, New Jersey 08817
Tel: (908) 287-4400 Fax: (908) 287-4955

RONALD R. CARVALDO
ASSISTANT SUPERINTENDENT

DR. JOSEPH A. [illegible]
SUPERINTENDENT

DANIEL P. MICHALO
BUSINESS ADMINISTRATOR/BOARD SECRETARY

August 11, 1992

THE BOARD HAD AGAIN DELAYED REHIRING TO ASSURE THAT I WOULD NOT QUALIFY TO ELECT MY HEALTH BENEFITS UNDER THE CONDITIONS STATED IN N.J.S.A. 18A:27-51.12. ACCORDING TO LORENE MOORE BEING FRAUDULENTLY SUBJECTED TO R.I.F. ENDING MY EMPLOYMENT ON JUNE 30, 1992 BREACHED MY EMPLOYMENT AND AS A RESULT I NO LONGER HAD THE RIGHTS THAT TENURE GUARANTEES. THEIR INTEREST IN DELAY WAS ALSO TO COERCE ME INTO BEING REPRESENTED BY THE N.J.E.A. ATTORNEY STEPHEN KLAUSNER. MR. GUNDRY. E.T.E.A. PRESIDENT ACTED IMPROPERLY AND DID NOT FILE A GRIEVANCE.

Mr. Edward M. Renaud
508 Fox Ave.
Belford, NJ 07718

Dear Mr. Renaud:

We are happy at this time to be able to reappoint you from the RIF (reduction in force) list. Your assignment for the 1992-93 school year will be:

FROM : I.A./ EHS-.8

TO : I. A. Long-Term
Sub/WW-9/1-10/31/92-I.A./WW11/1/91-6/30/93

Please contact your building principal(s) at your earliest convenience to discuss details pertaining to this assignment.

Best wishes for a successful school year.

Sincerely,

IN THIS LETTER LORENE MOORE MAKE THE FALSE STATEMENTS THAT SHE DID NOT KNOW I WAS GRANDFATHERED, THAT NO RECORD EXISTED, THAT AS A SUBSTITUTE I HAD NO RIGHT TO ACCOMMODATION, SENIORITY, PENSION RIGHTS OR EMPLOYMENT. SHE BASED HER STATEMENTS ON THE FACT THAT I HAD BEEN "RIFFED" AND HAD LOST ALL OF MY EMPLOYMENT RIGHTS. LORENE MOORE WAS GUILTY TO CRIMINAL FRAUD AND CONSPIRING TO OBSTRUCT MY RIGHTS TO EMPLOYMENT UNDER THE A.D.A., TITLE 18 A SCHOOL LAW AND THE L.A.D. I HAD ALSO LOST MY CONSTITUTIONAL RIGHT TO "DUE PROCESS".

Lorene W. Moore

LORENE W. MOORE
Director of Personnel

LWM/jm

cc: F. Cangelosi / W. Gabrielson / File

NOTABLY I WAS REHIRED IN AUGUST, MR. RALPH VENTOLA WHO WAS IMPROPERLY GRANTED MY SENIORITY POSITION IN 1984 WAS NOT REHIRED UNTIL SEPT. AND ARTHUR TODT WAS GIVEN PREFERENCE IN EMPLOYMENT AND ASSIGNED AS A C. I. E. COORDINATOR IN ORDER TO OBTAIN A TEACHING CERTIFICATE FOR HIM.

Nothing Less Than Excellence

THE FRAUDULENT SENIORITY LIST WAS USED TO JUSTIFY THE BOARD'S ACTIONS WHICH WERE INTENTIONAL AND MALICIOUS.



950437100677

AUGUST 13, 1992
508 FOX AVE.
BELFORD, N.J 07718

TO: LORENE W. MOORE
DIRECTOR OF PERSONNEL

I AM PLEASED TO ACCEPT A POSITION WITH THE PUBLIC SCHOOLS OF EDISON TOWNSHIP AS A INDUSTRIAL ARTS TEACHER.

I HAVE PREVIOUSLY INFORMED MY SUPERVISOR MR. FLOR THAT A RE-ASSIGNMENT TO A MIDDLE SCHOOL POSITION INDICATES A FAILURE ON THE PART OF THE EDISON SCHOOL SYSTEM TO GRANT ME REASONABLE ACCOMIDATION AS A DISABLED EMPLOYE AS REQUIRED BY THE AMERICANS WITH DISABILITIES ACT.

THE EDISON SCHOOL SYSTEM HAS BEEN AWARE OF THE SPECIFIC REQUIREMENTS CAUSED BY MY DISABILITY AND HAS MADE ACCOMIDATION IN THE PAST. IT IS OBVIOUS THAT THE SCHEDULE OF THE MIDDLE SCHOOLS CANNOT BE ARRANGED TO ALLOW ME TO SLEEP AT THE INTERVALS REQUIRED; THE HIGH SCHOOL SCHEDULE ALLOWS THIS ACCOMIDATION AND HAS BEEN ARRANGED TO ALLOW ME TO CONTINUE MY EMPLOYMENT DESPITE MY DISABILITY.

PLEASE BE ADVISED THAT THIS REQUEST FOR REASONABLE ACCOMIDATION ADDRESSES ONLY THE IMMEDIATE PROBLEM OF DEALING WITH MY DISABILITY REGARDING A SPECIFIC SYMPTOM OF NARCOLEPSY. RESOLUTION OF THIS FAILURE ON THE PART OF THE SCHOOL SYSTEM TO PROVIDE REASONABLE ACCOMIDATION CAN BEST BE RESOLVED BY MEETING WITH ME SO THAT I MAY MAKE CLEAR THE RANGE OF MY DISABILITIES AND THE ACCOMIDATIONS THAT MAY BE REQUIRED.

IT HAS BEEN MADE CLEAR TO ME IN BOTH MY CONVERSATIONS WITH MR. FLOR AND IN COMMUNICATION WITH YOU BY PHONE ON AUGUST 13, 1992 THAT THE EDISON SCHOOL SYSTEM HAS NO INTENT OF GRANTING REASONABLE ACCOMIDATION TO ME AS A DISABLED PERSON. I WOULD HOPE THAT WHAT APPEARS TO BE POLICY OF REFUSAL TO GRANT REASONABLE ACCOMIDATION WOULD BE RECONSIDERED BEFORE THE OPENING OF SCHOOL IN SEPTEMBER. I HAVE BEEN ADVISED OF MY RIGHT TO

950437006 / 8

FILE A COMPLAINT UNDER THE AMERICANS WITH DISABILITIES ACT BY THE DISTRICT INFORMATION OFFICE. REGARDING THE EDISON SCHOOL SYSTEM'S FAILURE TO PROVIDE REASONABLE ACCOMIDATION. SPECIFIC ISSUES THAT WERE DISCUSSED INCLUDED:

1. REFUSAL ON THE PART OF THE EDISON SCHOOL SYSTEM TO ACCOMIDATE ME BY REMOVING ME FROM A POSITION AT EDISON HIGH SCHOOL AND REFUSAL TO RETURN ME TO THAT POSITION WHERE I HAVE TAUGHT SUCCESSFULLY FOR YEARS AS A DISABLED PERSON.
2. THE PROPOSAL BY MR. FLOR THAT THE SCHOOL BOARD WOULD POSSIBLY CHOSE TO FORCE ME TO RETIRE

BOTH OF THE ABOVE SITUATIONS ARE GROUNDS FOR ME TO FILE WITH THE E.E.OC.. THE PURPOSE OF THE AMERICANS WITH DISABILITIES ACT IS TO PROTECT EMPLOYMENT RIGHTS. AND I WILL NOT ACCEPT DENIAL OF MY RIGHT TO WORK AS A DISABLED PERSON, NOR WILL I ACCEPT ANY LOSS OF BENEFITS OR COMPENSATION CAUSED BY FAILURE OF THE EDISON SCHOOL SYSTEM TO COMPLY WITH THE LAW.

I HAVE INCLUDED A COPY OF THE NARCOLEPSY FACT SHEET, ADDITIONAL INFORMATION CAN BE OBTAINED FROM THE NARCOLEPSY ASSOCIATION. AS AN ACTIVE MEMBER OF THE ASSOCIATION I CAN PROVIDE ADDITIONAL INFORMATION SPECIFIC TO MY EXPERIENCE WITH THIS DISABILITY

AGAIN, I WILL EXPECT THAT THIS SITUATION WILL BE RESOLVED BEFORE THE OPENING OF SCHOOL FOR THE 1992-1993 YEAR

SINCERELY.
Edward Renard.

9504370069

COMMITTEES:
PUBLIC WORKS AND TRANSPORTATION
MERCHANT MARINE AND FISHERIES
ARMS

REPLY TO:
WASHINGTON OFFICE:
[illegible]
TELEPHONE (202) 225-4671

FRANK PALLONE, Jr.
3RD DISTRICT, NEW JERSEY

REPLY TO:
DISTRICT OFFICES:
☐ [illegible]
☐ [illegible]
☐ [illegible]
☐ [illegible]

# Congress of the United States
## House of Representatives
### Washington, DC 20515-3003

September 1, 1992

Equal Employment Opportunity Commission
60 Park Place
Newark, New Jersey 07102

MR. CORRADO GIGANTE DISPOSED OF THIS LETTER AND THE COMPLAINT FORM I HAD COMPLETED. LORENE MOORE'S STATEMENT THAT THE EE.OC. WOULD DO NOTHING PROVED PRESCIENT, MY THREE INDICATED THAT L. MOORE, THE N.J.E.A. ATTORNEY STEVEN KLAUSNER AND CORRADO HAD ACTED TO BAR MY FILING ANY COMPLAINT.

RE: Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718

As you will note from the attached, I have been contacted by Mr. Edward Renaud expressing his concern regarding a problem with his employer.

According to Mr. Renaud, his employers refuse to comply with the Americans with Disabilities Act. Mr. Renaud stated as a teacher he has made every attempt to resolve his problems before school begins on September 2, 1992.

Any assistance that you can offer Mr. Renaud in expediting his complaint would be greatly appreciated. Thanking you for your cooperation and assistance.

Sincerely,

Frank Pallone, Jr.

FRANK PALLONE, JR.
Member of Congress

FP/rh

IN RESPONSE TO THE BOARD'S REPRESENTATIVE LORENE MOORE'S COMPLETE REFUSAL TO MEDIATE ACCOMMODATION I BROUGHT MY PROBLEM TO CONGRESSMAN PALLONE'S OFFICE. AS I RECALL I HAD THE UNUSUAL PROBLEM THAT FOR TWO DAYS I COULD NOT MAKE A PHONE CONNECTION WITH THE PHILADELPHIA OFFICE OF THE EEOC. THIS MAY HAVE BEEN THE FIRST INCIDENT WHERE MY PHONE CALLS WERE SUBJECTED TO TAMPERING

IN CONTACTING THE NEWARK OFFICE OF THE E.E.O.C. I FOUND THEM INSISTENT THAT I APPEAR IN PERSON TO FILE A COMPLAINT. EACH OF THE 3 TIMES I ATTEMPTED TO FILE CHARGES AGAINST THE BOARD OF EDUCATION THE DIRECTOR OF THE NEWARK OFFICE. CORRADO GIGANTE "HANDLED" MY COMPLAINT. ON SEPT. 2, 1992 HE REFUSED TO ALLOW ME TO FILE A COMPLAINT. HIS POSITION WAS THAT HE SUPPORTED LORENE MOORE'S FALSE STATEMENT THAT THE INDIVIDUALS WHO HAD BEEN PUT IN MY TEACHING POSITION AT EDISON HIGH SCHOOL HAD "SENIORITY IN POSITION." NO LAW SUPPORTS THIS, IN FACT THE REPLACEMENTS HAVE NO PERMANENT CERTIFICATE.

A-40

9504370C330

# Public Schools of Edison Township

100 Municipal Boulevard, Edison, New Jersey 08817

Tel: (908) 287-4400 Fax: (908) 287-4955

RONALD R. CASTALDO
ASSISTANT SUPERINTENDENT

DR. JOSEPH A. KOMINSKY
SUPERINTENDENT

DANIEL P. MICHAUD
BUSINESS ADMINISTRATOR/BOARD SECRETARY


September 15, 1992

AT A SEPT. 7, 1992 MEETING L. MOORE REFUSED TO DISCUSS ANY OTHER SCHEDULE OR COMPROMISE. SHE DENIED THAT I WAS ENTITLED TO ANY PAY FRAUDULENTLY STATING THAT I WAS A SUBSTITUTE AND I HAD "DECIDED NOT TO COME TO WORK". MR. KLAUSNER REFUSED TO REPRESENT ME AT THE MEETING AND REFUSED TO REPAND IN WRITING TO ALL OF THE ACTIONS BY L. MOORE TO CRIMINALLY COERCE ME IN TO ACCEPTING VIOLATIONS OF MY RIGHTS.

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

NOTABLY ONE MONTH AFTER I HAD REQUESTED TO MEDIATE ACCOMMODATION.

In response to your request on August 13, 1992 that we accomodate your disability, as specified by your doctor, I am pleased to inform you that the original schedule has been adjusted to meet your disability limitations.

THE HIGH SCHOOL SCHEDULE AFFORDED COST FREE ACCOMMODATION.

Since you were recalled from the Reduction-in-Force List, your entitlement as a teacher is to the first Industrial Arts position that becomes available. Because of the unexpected retirement of one of our staff members at Woodrow Wilson Middle School, we are able to bring you back into this position.

AS I PREVIOUSLY STATED THE FRAUDULENT SENIORITY LIST WAS USED TO JUSTIFY A ADVERSE ACT.

Mr. Donald Flor has indicated that your schedule has been adjusted to include the following:

FRAUDULENT SCHEDULE AND ONLY SCHEDULE OFFERED

| | | |
|---|---|---|
| ADDS UP TO .85 | Periods 1 & 2 | - Teaching periods |
| | Period 3 | - Duty free |
| | Period 4 | - Teaching period followed by a 26-minute lunch/rest break (I WOULD HAVE TO SLEEP + EAT IN 26 MINUTES) |
| POSITION BELOW IS STATED AS .85. IT IS A FRAUD. IT DOES NOT "ADD UP". | Period 5 & 6 | - Teaching period 2 PERIODS ARE COMBINED TO LESSEN APPEARANCE OF ACCOMMODATION |
| | Period 7 | - Assigned to another Industrial Arts Teacher |

NOT ONLY IS IT NOT COMPARABLE IT IS A FRAUD.

We have adjusted this schedule to make it comparable to the schedule you previously worked under at the Edison High School. Instead of a 1.0 position, however, it is a .85. Your past assignment was that of a .80. (AS A RESULT OF COERCING ME TO ACCEPT A PART TIME POSITION.)

Hopefully, this schedule will meet your needs. Please contact my office, letting me know your immediate plans, as staffing this position requires our immediate attention.

Respectfully,

Lorene W. Moore

LORENE W. MOORE
Director of Personnel

AND SENT THRU THE MAIL THIS IS MAIL FRAUD.

.WM/jm

cc: D. Flor
J. Gundry

"THIS ACCOMMODATION" WOULD BE:

1. A VIOLATION OF MY RIGHTS UNDER N.J.S.A. 18A:6-10. IN THAT IT WOULD REDUCE MY PAY.
2. A ACCEPTANCE BY ME OF A FRAUD, AND A FRAUD THAT WOULD NOT PROVIDE THE ACCOMMODATION TO MY DISABILITIES THAT I REQUIRE
3. IF I COULD HAVE PHYSICALLY SURVIVED ON THIS SCHEDULE THE BOARD WOULD HAVE "CORRECTED" THE CRIMINAL FRAUD REGARDING SWITCHING MY POSITION IN SENIORITY BY CRIMINALLY COERCING ME TO ACCEPT THIS SCHEDULE.

# Public Schools of Edison Township

100 Municipal Boulevard • Edison, New Jersey 08817

Tel: (908) 287-4400 Fax: (908) 287-4955

RONALD R. CASTALDO
ASSISTANT SUPERINTENDENT

DR. JOSEPH A. KRESKEY
SUPERINTENDENT

DANIEL P. MICHAUD
BUSINESS ADMINISTRATOR/BOARD SECRETARY

October 15, 1992

HAVING FAILED TO COERCE ME TO ACCEPT A FRAUDULENTLY STATED TEACHING SCHEDULE L. MOORE THEN ACTED TO SUPPORT HER REFUSAL TO ISSUE MY PAY OR ACCOMMODATE MY DISABILITY BY VIOLATING BOARD PROCEDURE AND STATE LAW AND IN HER ACTIONS VIOLATED MY DUE PROCESS RIGHTS.

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

My reason for this correspondence is two-fold. First in my letter dated September 15, 1992, I informed you of the accomodation that the administration will make in order to accomodate your disability. To date we've had no response from you in reference to this matter.
THE N.J.E.A. AND ATTORNEY REFUSED TO ADVISE, ACT OR ASSIST ME IN MAKING ANY REPLY.
In order for us to be assured that our classroom is staffed and to determine whether or not we need to make further arrangements with our substitute, you as asked to respond in writing by October 22, 1992, as to your plans. MR. JOHN GUNDRY ALSO REFUSED TO ASSIST ME IN MAKING ANY REPLY.

1 Second, I have been informed by the district's Chief Medical Inspector, Dr. De Castro, that before you can enter the classroom, you must schedule an appointment to come to her office for a physical examination.* This request was triggered when I sent a copy of your doctor's note to her office for verification of diagnosis. THE N.J.E.A. AND ATTORNEY STEPHEN KLAINER SUPPORTED THIS ILLEGAL EXAMINATION VIOLATING BOARD POLICY AND N.J.S.A. 18A:16-3

2 She has, also, requested that you bring with you a list of medications that you are presently taking.

3 Please contact her for an appointment as soon as possible. In the event that I may be of further assistance, please do not hesitate to contact me.

Sincerely,

Lorene W Moore

LORENE W. MOORE.
Director of Personnel

LWM/jm

*N.J.S.A. 18A:16-2

cc: D. Flor
J. Gundry

1. PRIOR TO MAKING THIS ILLEGAL AND UNWARRANTED DEMAND MR. JOHN GUNDRY STATED TO ME THAT MY SUPERVISOR MR. DONALD FLOR HAD THREATENED TO INVADE THE PRIVACY OF MY MEDICAL RECORDS AS A MEANS OF GETTING RID OF ME.
2. LATER L. MOORE SUBMITS A LETTER DATED SEPT. 9, 199 AT A UNEMPLOYMENT HEARING ON DEC 4, 1992 CLAIMING THAT IT WAS DR. DE CASTRO WHO DEMANDED A MEDICAL EXAMINATION. THAT DOCUMENT IS A FRAUD AS TO DATE AND CONTENT. DR. DE CASTRO NEVER CONTACTED MY DOCTOR.
SEE PAGE B3 FOR DOCUMENT.
3. WITH MR. KLAINERS SUPPORT I WAS SUBJECTED TO CRIMINAL COERCION IN THIS INSTANCE, INVASION OF PRIVACY, AND DR. DECASTRO WAS PARTY TO OBSTRUCTING MY RIGHTS IN HER ACTIONS TO DENY ME OPPORTUNITY TO BE EXAMINED AND RETURN TO WORK

CHAMLIN, ROSEN, CAVANAGH & ULIANO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
[redacted] NORWOOD AVENUE
P.O. BOX 36
WEST LONG BRANCH, N.J. 07764
[redacted] 229-2900
TELEFAX # [redacted] 571-8741

GEORGE N. CHAMLIN
CERTIFIED CIVIL TRIAL ATTORNEY
RONALD B. ROSEN
CERTIFIED CIVIL TRIAL ATTORNEY
FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
THOMAS W. CAVANAGH, JR.
N.J., NY & D.C. BARS
CHARLES J. ULIANO
CERTIFIED CIVIL & CRIMINAL TRIAL ATTORNEY
KENNETH W. CHAMLIN
N.J. & N.Y. BARS

ROBERT P. MCKEVITT
SHARON LYNCH NORTON
N.J. & N.Y. BARS
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
N.J. & PA. BARS

April 21, 1993

R. Joseph Ferenczi, Esq.
1863 Lincoln Highway
Box 363
Edison, New Jersey 08818

Re: *Renaud v. Edison Township Board of Education*
Our File No. 26089

Dear Mr. Ferenczi:

This will confirm that our meeting regarding the abovesaid matter has been rescheduled to Wednesday, April 28, 1993 at 10:00 a.m. at the offices of the Edison Board of Education. In addition to you and me, present will be Mr. Renaud, Mr. Flor, and Ms. Lorene Moore, the Superintendent.

Thank you for your courtesies in this matter.

Very truly yours,

Sharon Lynch Norton
SHARON LYNCH NORTON

SLN/mmc
cc: Mr. Edward Renaud

PRIOR TO THIS MEETING SHARON LYNCH NORTON INSTRUCTED ME NOT TO SPEAK ON MY OWN BEHALF; THE SAME INSTRUCTION THAT MR. KLAUSNER MADE TO ME FOR THE OCT. 28, 1992 MEETING WITH D.C. KRUSEN, C. MOORE AND JOHN GUNDRY. I BELIEVE THAT BOTH OF THESE MEETINGS WERE RECORDED AND MAY HAVE BEEN SUBMITTED AS MY HEARING BEFORE THE BOARD OF EDUCATION CLAIMING THAT MY DUE-PROCESS RIGHTS WERE OBSERVED. AT THIS POINT I HAD INFORMED MRS. NORTON THAT THE TEACHING SCHEDULE OFFERED ON OCT. 16, 1992 WAS A FRAUD, THAT WASHINGTON NATIONAL INSURANCE CO. HAD REFUSED TO PAY MY CLAIM FOR DISABILITY FROM OCT. 1992 THRU FEB. OF 1993. THAT MONEY HAD BEEN FRAUDULENTLY REMOVED FROM MY ANNUITY ACCOUNT, THAT WASHINGTON NAT'L HAD RETALIATED FOR THE BOARD AS A CONSPIRING PARTY WHEN THE COMPLAINT I FILED AT THE D.C.R. WAS SERVED ON THE BOARD. MRS. NORTON KNEW THAT MY SENIORITY WAS A FRAUD AND THAT I HAD BEEN EXCLUDED WITHOUT PAY OR DUE PROCESS, AND THAT THE TAPES FROM UNEMPLOYMENT HEARING OF DEC 4, 1992 HAD BEEN ALTERED.



9504370063

# Public Schools of Edison Township

100 Municipal Boulevard • Edison, New Jersey 08817

Tel: (908) 287-4400 Fax: (908) 287-4855

Dr. Joseph A. Kinkiery
Superintendent

Daniel P. Michaels
Business Administrator/Board Secretary


April 23, 1993

Mr. Edward Renaud
508 No. Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

The Board of Education is presently reviewing the table of organization for school year 1993-94. Because the total number of positions available cannot be determined at this time due to staff members returning from various leaves of absences and enrollment trends, it may be necessary to terminate some individuals. Please be aware that this notice is being sent to all non-tenured staff members and some tenured staff members.

Therefore, in order for the Board to comply with the deadline established by New Jersey statutes and contractual notice requirements, I must inform you that your name will be given to the Board of Education to consider as a possible employee who will not be offered a renewal contract for the 1993-94 school year. This meeting will be held on Tuesday, April 27, 1993 in Edison High School at 7:30 p.m. The Board plans to meet in Executive Session immediately after the public session to approve the list of professional staff members to be notified of non-renewal of contract.

You have a right to request that any such discussion and decision regarding your employment be made in public session rather than private session. If that is your intention, please notify this office and confirm in writing no later than 12:00 noon on April 26, 1993. If I do not hear from you, the discussion will be in private. Formal action will be taken at the scheduled Board Meeting on Tuesday April 27, 1993.

Sincerely,

Lorene W. Moore

LORENE W. MOORE
Director of Personnel

LWM/jm

AND SEE PAGES 105, 106, 107

HERE I WAS GIVEN LESS THAN 2 HOURS TO "CONFIRM IN WRITING" THAT I WANTED DISCUSSION OF MY EMPLOYMENT DISCUSSED AT A PUBLIC SESSION. AGAIN MY RIGHTS WERE OBSTRUCTED, I HAD BEEN SUSPENDED WITHOUT PAY OR DUE PROCESS, THE WASHINGTON NAT'L INSURANCE COMPANY HAD CONSPIRED TO DENY ME INCOME. IN CONTACTING THE N.J.E.A. PAID ATTORNEYS MRS. NOCERA - MR. CALLAHAN ADVISED ME NOT TO SPEAK IN A PUBLIC SESSION. THERE WAS NO TIME LEFT TO MEET A 12:00 NOON DEADLINE AGAIN MY RIGHTS WERE OBSTRUCTED WITH THE ASSISTANCE OF N.J.E.A. PAID ATTORNEYS, THEIR INTEREST BEING TO CONCEAL CRIME, CORRUPTION AND CRIMINAL CONSPIRACY.

Nothing Less Than Excellence

A-45

950431/000554

Public Schools of Edison Township
100 Municipal Boulevard, E. Edison, New Jersey 08817
Tel: (908) 287-4400 Fax: (908) 287-4866

Dr. Joseph A. Kresley
Superintendent

Daniel P. Michaud
Business Administrator/Board Secretary

April 30, 1993

Mr. Edward Renaud
508 No. Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

We are sorry to inform you that because of the defeat of the Edison Public School's 1993-94 school budget on April 20, 1993, the total number of positions available cannot be determined at this time. Additionally, we have not been able to determine the number of staff members returning from various leaves of absences. Thus, you are hereby notified that at the meeting held on April 30, 1993 at 9:00 a.m., the Edison Board of Education voted not to renew your contract for the 1993-94 school year.

Please be advised that the Board of Education has every intention of reappointing the majority of the riffed staff members by the May Board of Education meeting. We will be in touch with you in the near future.

Sincerely,

Lorene W. Moore

LORENE W. MOORE
Director of Personnel

LWM/jm

HERE I AM AGAIN SUBJECTED TO R.I.F., AND IN THIS INSTANCE I AM SUBJECTED TO THAT ACTION BASED ON A FRAUDULENT SENIORITY LIST. L MOORE FAILS TO MENTION THAT I HAD BEEN SUSPENDED WITHOUT PAY OR DUE PROCESS; AND THAT SHE AND DR. JOSEPH KRESLEY HAD GONE BEFORE THE BOARD OF EDUCATION AND MADE A FALSE SWEARING TO CONCEAL CRIMINAL ACTIVITY.

AGAIN SEE PAGES 105, 106, 107.

AT THIS POINT THE INTEREST OF THE N.J.E.A. AND ATTORNEY WAS TO COERCE ME TO ACCEPT HER CANCELLATION OF THE D.C.R. HEARING SCHEDULED FOR MAY 6, 1993.

# Public Schools of Edison Township

100 Municipal Boulevard • Edison, New Jersey 08817
Tel: (908) 287-4400 Fax: (908) 287-4865

Dr. Joseph A. Kresnicky
Superintendent

Daniel P. Richard
Business Administrator/Board Secretary

August 11, 1993 (1)

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

We are happy at this time to be able to reappoint you from the RIF (reduction in force) list. Your assignment for the 1993-94 school year, effective September 1, 1993, will be:

(2) FROM : Industrial Arts - Woodrow Wilson M.S.

TO : Industrial Arts - Woodrow Wilson M.S.

Please contact your building principal(s) at your earliest convenience to discuss details pertaining to this assignment.

Best wishes for a successful school year.

Sincerely,

(3) Lorene W. Moore

LORENE W. MOORE
Director of Personnel

LWM/jm

cc: R. Traficante
Personnel File

1. ALTHOUGH THE BOARD OF EDUCATION HAD REHIRED ME ON JUNE 14, 1993 THEY FAILED TO NOTIFY ME OF THAT ACTION UNTIL AUGUST 11, 1992. THERE ONLY INTEREST IN ACTING TO OFFICIALLY REHIRE ME WOULD BE TO AVOID COMPLYING WITH N.J.S.A. 18A:30-3.4 WHICH WOULD REQUIRE THE BOARD TO PRODUCE A ACCOUNTING OF MY ACCUMULATED SICK DAYS, THE BOARD HAD STOLEN SICK DAYS FROM MY ACCOUNTING. THIS SINGLE VIOLATION WOULD INCUR THE REMOVAL OF STATE FUNDS FROM THE DISTRICT (N.J.S.A. 18A:30-5)
2. I WAS REHIRED TO THE SAME POSITION THAT FOR THE 92-93 SCHOOL YEAR WAS USED TO SUSPEND ME WITHOUT PAY OR DUE PROCESS (AGAIN THE BOARD REFUSED TO MEDIATE.)
3. LORENE W. MOORE HAD RESIGNED IN JULY 92 AND DID NOT AFFIX HER STAMP TO THIS LETTER,

# Public Schools of Edison Township

100 Municipal Boulevard • Edison, New Jersey 08817

Tel: (908) 287-4400 Fax: (908) 287-4405

Dr. Joseph A. Kinsky
Superintendent

Daniel P. Michaels
Business Administration/Board Secretary


November 19, 1993

RECEIVED NOV 23, 93

Mr. Edward Renaud
508 No. Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

This is to notify you that your assignment for the 1993-94 school year is as follows, effective September 1, 1993:

FROM : Industrial Arts - Woodrow Wilson M.S. (1.0)

TO : Industrial Arts - Edison H.S. (1.0)

ACCOMMODATION FINALLY PROVIDED RETURNING ME TO WORK ON OCT. 15, 1993 FROM A SUSPENSION WITHOUT PAY OR DUE PROCESS.

If you have any further questions regarding your new schedule, please do not hesitate to call.

Sincerely,

Vincent J. Capraro

DR. VINCENT J. CAPRARO
Acting Assistant Superintendent

VJC/jm

cc: Personnel File

950437002637

PER THE BOARD DOCUMENTS THAT THEY ADMIRED ACCOMMODATION TO MY DISABILITIES AND CONTINUED A SUSPENSION WITHOUT PAY OR DUE PROCESS THAT BEGAN SEPT. 1, 1992. THEY BEGAN ACTED IN WITH CRIMINAL INTENT TO COERCE ME TO END MY EMPLOYMENT. THE BOARD REFUSED TO MEDIATE ACCOMMODATION UNTIL SEPT. 27, 1993 PROLONGING MY SUSPENSION. THE MEETING OF SEPT. 27 REPEATED A PATTERN, MRS. NORTON STATED TO ME THAT SHE HAD TOLD THE BOARD'S ATTORNEY THAT I COULD NOT TEACH MORE THAN 2 PERIODS IN A ROW AS ACCOMMODATION. MRS NORTON DID THAT TO ASSURE THAT ANY SCHEDULE WOULD REDUCE MY PAY AND SENIORITY SO AS TO CORRECT WHAT SHE KNEW WAS A FRAUDULENT SENIORITY LIST THAT HAD BEEN CREATED IN THE CONSPIRACY OF 1984. I RECOGNIZED HER AND THE BOARD'S INTENT. WHEN I TOLD HER THAT I WOULD NOT ACCEPT REDUCED PAY AND VIOLATION OF MY RIGHTS SHE WAS VISIBLY UPSET, AT THAT MEETING MRS NORTON AGAIN INSTRUCTED ME NOT TO SPEAK; WHEN I DID SPEAK I STATED THAT WHATEVER SENIORITY LIST THEY USED I HAD THE RIGHT TO ACCOMMODATION IN A HIGH SCHOOL POSITION WHICH PRODUCED COST FREE ACCOMMODATION. AGAIN AS WITH MR. KLAUNER ON OCT. 28, 1992 MRS. NORTON MADE ME LEAVE THE MEETING. I BELIEVE IT WAS *Nothing Less Than Excellence* SO THEY COULD CORRECT THE RECORDED RECORD.

# Public Schools of Edison Township

100 Municipal Boulevard, Edison, New Jersey 08817

Tel: (908) 287-4400 Fax: (908) 287-4855

DR. JOSEPH A. KRESKEY
SUPERINTENDENT

DANIEL P. MICHAUD
BUSINESS ADMINISTRATOR/BOARD SECRETARY


April 13, 1994

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

At a regular meeting on April 11, 1994, the Edison Township Board of Education determined that a reduction in teaching staff was necessary. Where possible, positions of non-tenured teachers were eliminated, but the Board of Education was forced to terminate a number of tenured staff members.

I regret to inform you that your tenured position was one of those affected for the 1994-95 school year - and that consequently the Board of Education is not able at this time to offer you employment for the school year beginning on September 1, 1994.

NJSA 18A:28-11 requires that you be advised of your seniority status. In the table below, we have listed you years, months and days of seniority in the appropriate category, and your ranking among those affected in terms of eligibility for rehiring. HERE IS STATED MY "SENIORITY". AS I STATED TO MRS. GIBSON LYNCH NORTON ON MARCH 17, 1994; THE BOARD, E.T.E.A. AND N.J.E.A. HAD ACHIEVED THEIR GOAL OF TAKING 4 YEARS PAY. REDUCED MY SENIORITY TO CORRECT FRAUD AND CONSPIRACY AND PERMANENTLY REDUCED MY PAY.

| CATEGORY | SENIORITY Years | Months | Days | Ranking |
|---|---|---|---|---|
| Industrial Arts | 18 | 2 | 12 | 15 of 16 |

As provided in NJSA 18A:28-12, your name is being placed on a preferred eligible list for re-employment whenever a vacancy occurs in your area of service. There is no time limit on your position on this eligibility list and you will remain on said list until you are either re-employed or refuse a position offered to you.

The Board of Education regrets the necessity of eliminating your position, but looks forward to being able to offer you a position as soon as one becomes available.

Sincerely,

DR. VINCENT J. CAPRARO
Acting Assistant Superintendent

VJC/jm




0504370062 8

6. The Board shall provide a payroll deduction program for the purchase of United States Savings Bonds.

B. Salary Guide Credit

Effective for unit personnel new to the district who are hired on or after September 1, 1986, credit for up to nine (9) years teaching or related experience will be given. In addition, full credit for up to four (4) years military service will be given.

C. Tenure Increment

All tenured teachers will receive an additional tenure increment of three hundred dollars ($300.00) beyond the salary guide entitlement.

D. Employment Credit TO MY KNOWLEDGE THIS PART OF THE CONTRACT HAS BEEN USED AGAINST OTHERS IN THE BOARD'S EMPLOY IN THE SAME MANNER THAT I EXPERIENCES. (SEE PAGE BOTTOM)

1. Teachers employed for a full work day by September 30th shall receive a full step increment in the salary guide. Teachers employed for a full work day for five (5) or more months, but not more than nine (9) months, shall receive one-half (1/2) step increment in the salary guide. Teachers employed for a full work day for less than five (5) months shall receive no increment in the salary guide.

2. Teachers employed for one-half (1/2) work day or more, but less than a full work day by September 30th shall receive a full step increment in the salary guide. Teachers employed for one-half (1/2) work day or more, but less than a full work day for five (5) or more months, but not more than nine (9) months, shall receive one-half (1/2) step increment in the salary guide. Teachers employed for one-half (1/2) work day or more, but less than a full work day for less than five (5) months shall receive no increment in the salary guide.

3. Teachers employed for less than one-half (1/2) work day by September 30th shall receive a full step increment in the salary guide. Teachers employed for less than one-half (1/2) work day for five (5) or more months, but not more than nine (9) months, shall receive one-half (1/2) step increment in the salary guide. Teachers employed for less than one-half (1/2) work day for less than five (5) months shall receive no increment in the salary guide.

E. Differentials

1. Differentials will be granted for a Master's Degree or Master's Equivalency (Bachelor's + 30 credits), Sixth Level (Master's + 30 credits), and Seventh Level (Master's + 60 credits). Placement on the Doctoral guide will be granted when the Doctorate is awarded. Transcripts of credit must be submitted to the Superintendent's office.



CLAIMS HAVE BEEN MADE TO OTHERS, PARTICULARLY PREGNANT WOMEN THAT THEY WOULD RETURN AS SUBSTITUTES, THE SPECIFIC INTENT BEING TO DENY THEM PAY INCREMENTS DUE TO THEM, AND IS AGAIN A MATTER WHERE THEIR PAY IS REDUCED IN EFFECT THEY ARE PAYING FOR INCURRING MEDICAL EXPENSES.

A-50

9504137006339

Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718

February 3, 1993

Lorene Moore
Director of Personnel
Public Schools of Edison
100 Municipal Boulevard
Edison, New Jersey 08817

Dear Ms. Moore,

In response to your letter of January 22, 1993 I must again seek clarification of your statements. It is apparent from your most recent letter that you are attempting to convey the appearance of obeying Title 1 of the Americans with Disabilities Act. Also has created fraudulent documents to obstruct my rights.
To make it easier for the parties investigating this case I will use your number system as a format.

1. Does "standard operating" procedure include the following? Having Dr. Decastro's office cause delay by refusing to return my phone calls when I identified myself? Having the office staff tell me there is "nobody here" and hang up when I reached the office directly? Only arrange an appointment for me when I did not identify myself? Does it include having me wait beyond normal office hours and taking all patients before me even those with appointments one hour after mine? Does it include her confirming a diagnosis of a patient at your request with out seeing him? Does she ask every patient as the first question of a medical exam "Why don't you retire?"

2. Your recollections differ from mine significantly in that yours would indicate that I have caused delay in my returning to work. I will take this opportunity to clarify important issues. Do you and Dr. DeCastro act independently and separately as you previously stated? If you act separately and independently whose instructions do I follow? If you work together can you then explain Dr. DeCastro's actions?

9504137006270

Let's address the current problem caused by you and Dr. DeCastro.
Dr. Rieman, the neurologist that you agreed to have my records sent to in our conversation of November 12, 1992 does not exist. My effort to return to work led me to call Directory Assistance to obtain the phone number that you and Dr. DeCastro neglected to provide. Dr. Rieman, a neurologist does not exist within the 908 or the 201 area codes. This certainly explains why you did not notify me to make an appointment as you said you would. You can't send the medical records that I provided from my doctor to a doctor that does not exist. This is another and new cause of delay. Ann Slater found that L. Rieman had contacted Dr. Rieman as early as Nov. 5, 1992.

As you are aware my attempts to return to work with the medically required accommodation have gone on since August. To avoid futher delay I propose the following reasonable procedure.

Immediately return the medical records that I provided from the Medical College of Pennsylvania to me. Dr. Decastro may make a copy and properly maintain that copy. These records are my properrty and were obtained at my cost. This will allow me to be sure that they are accurate and that they are put into the possesion of the next doctor in the School Boards employ that you suggest.

Have Dr. Decastro fully reply to my letter of January 14, 1993. This will resolve the conflict of instructions and clarify where the responsibility for delay lies.

3. You assume incorrectly unless you are using the word in the in the sense that it means to pretend. You have been repeatedly informed that I do not have a valid prescription card and of the difficulty obtaining medication without it. Dates of requests to you for that card are October 29, 1992 (in the presence of witnesses), November 12, 1992 (by phone) and again on January 14, 1993. I would suggest that it would be more appropriate for you to send a current prescription card to me rather than to make assumptions in your capacity as Director of Personnel.

And in reply to your conclusion: In defense of my position in this case and the English language I must insist that you not claim to "reiterate". This offer has never been made before to me.

In regard to your statement "that your schedule will be accommodated in any manner you deem necessary" I would suggest that you make use of the letter that I sent you dated August 13, 1992. In that letter I expressed my need for continuance of the

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accommodation granted in previous years. You have disregarded my requests and have not followed the guidelines for resolving this dispute contained in Title 1 of the Americans with Disabilities Act causing delay in my returning to work.

I must also question the appropriateness of having the Supervisor of Industrial Arts and Business, Mr.Flor as the person who would "assist" me. He was the first person I spoke to requesting accommodation and he clearly opposed it. Had you properly investigated this proposal for accommodation I am sure you would agree that my experience in teaching is essentially equal to his and my experience in teaching metals, drafting and use of drafting computers far surpasses his. It would seem that his help would be of questionable value. Accommodation have should have been simply and inexpensively arranged before the start of school as I requested. I would gladly have returned to my previous position at Edison High School where I would have been teaching in a situation that regards my disability.

Thank you for the forum your letter has provided. I expect that you will clarify all of these issues in your next correspondence and document your actions as I have.

I would like you to immediately send my valid prescription card and all of the paychecks that you have withheld up to this time.

Sincerely,

Edward Renaud

cc: file

9504370006222

In the matter of

**EDISON TOWNSHIP EDUCATION ASSOCIATION**

vs.

**Dr. Joseph A. Kreskey, Superintendent, and the EDISON TOWNSHIP BOARD OF EDUCATION**

**Grievance Submission**

**(Grv. #: 92-93:13)**

# STATEMENT OF GRIEVANCE

In accordance with the

**Agreement**

between

**EDISON TOWNSHIP EDUCATION ASSOCIATION**

WHO CONTINUES TO IGNORE THE PRIMARY ISSUE UNDER THE LAW. VIOLATION OF MY CONSTITUTIONAL RIGHT TO DUE PROCESS. A ISSUE WHERE THE BOARD WOULD HAVE NO DEFENSE.

and

**EDISON TOWNSHIP BOARD OF EDUCATION**

NO GRIEVANCE WAS FILED IN AUG. OF 1992: THE GRIEVANCE I FILED IN APRIL ON SENIORITY DISAPPEARED.

Date: 5/13/93

I WAS GIVEN NO NOTICE THAT THIS GRIEVANCE WAS FILED AND "SCHOOL LAW" VIOLATED IN THE FAILURE OF THE BOARD TO NOTIFY ME THAT I WAS BEING CHARGED BEFORE THE BOARD, OR THAT DR. KREESKEY AND L. MOORE HAD MADE A FALSE AND MALICIOUS SWEARING BEFORE THE BOARD.

A-71

9504370006923

DURHAM CENTER
2 ETHEL ROAD, SUITE 203A
EDISON, NEW JERSEY 08817

DATE PROBLEM OCCURRED: _____

DATE OF LEVEL 1 MEETING: _____

**INITIAL COMPLAINT FORM**

Name Edward Banard School Woodrow Wilson

School Phone 548-2550 Home Phone 495-2531

Best to Reach me at: Place Home Day _____ Time _____

Administrator/Supervisor Involved Edison Board of Ed; Dr. Kinsey; Lorraine Moore

Faculty Rep John B Grundy F/R Phone 287-4322

State the nature of the complaint in your own way. If applicable, include the date of the occurrence and all pertinent information. (use other side, if necessary). PLEASE ATTACH ALL PERTINENT DOCUMENTS.

At the beginning of the 1992-93 school year, Ed Banard was assigned to Woodrow Wilson Middle School. Ed Banard is handicapped, and as such, in compliance with the American Disibilities Act (ADA), requested reasonable accommodations be made. It is Central Administration's contention that this request was honored. Mr. Banard disputed this contention. On or about April 30, 1993, the BOE moved to terminate Mr. Banards employment. The reason given, "No Attendance."

What is the basis of the complaint? If possible, cite the contract violation by the article involved. Indicate if it is a violation of policy or an administrative decision that is the complaint.

Art III, B, "Just Cause".

IN FACT THE BOARD HAD BARRED ME FROM EMPLOYMENT, BREACHED THE CONTRACT, SUSPENDED ME WITHOUT PAY OR DUE PROCESS. HERE AGAIN MY DUE PROCESS RIGHTS WERE VIOLATED (I RECEIVED THIS GRIEVANCE MORE THAN 3 MONTHS AFTER IT WAS FILED)

Does this problem apply only to you? Yes To _____

If others are involved, who are they? _____

What remedy would you consider acceptable? Compliance with ADA mandates. Reinstatement

John B Grundy
Faculty Rep's Signature

5/13/93
Date Submitted

Complainant's Signature

MY SIGNATURE IS MISSING. MR FRED CIOCCOLA CALLED ME IN JUNE BUT NEGLECTED IN HIS POSITION AS GRIEVENCE CHAIRMAN THAT THIS GRIEVANCE EXISTED

[redacted]

February 20, 1993

Edward Renaud
508 Fox Avenue
Belford, NJ 07718

RE: RENAUD V. EDISON BOARD OF EDUCATION

Dear Mr. Renaud:

On Friday, February 12, 1993, you informed me that you preferred to have Tom Cavanaugh represent you in your discrimination complaint against the Edison Board of Education. At that time, I requested that you send me a note. My secretary has informed me that on Friday, February 12, 1993, you came in to pick up your file, exclusive of my work. IN FACT I EXPECTED MR. CAVANAUGH TO REPRESENT ME IN THE CORRECT ISSUE "SUSPENSION WITHOUT PAY OR DUE PROCESS"

I am enclosing to Mr. Cavanaugh, John Gundry, Mike Parise and John Warms copies of this letter and the complaint, affidavit and brief that I had prepared prior to your writing to the FTEA and NJEA. Had you contacted me directly, none of these pleadings would have been researched or drafted. MR. KLAUSNER DID NOT "SAY" ME KNOWING THAT HE HAD FRAUDULENTLY ATTACHED MY SIGNATURE TO THE AFFIDAVIT.

I must point out that the procedure that I started in February, litigation in the Superior Court, is the precise advise that I suggested in September. I clearly stated to you that the EEOC was useless and that they had not the slightest clue about the what Americans with Disabilities Act was or how to implement it. Your two visits to the Newark office should have confirmed this advise. Your insistence about the A.D.A. has delayed, to your detriment, your case being heard for six months. MR. KLAUSNER FAILS TO MENTION THAT IN 3 VISITS THE NEWARK DIRECTOR COULD NOT EVEN REFUSE MY COMPLAINT.

All other papers in my file were received, by you, and should be turned over to Mr. Cavanaugh. If he has an questions, he can call me directly. MR. KLAUSNER NEGLECTS TO MENTION THAT HE HAD FORWARD DOCUMENTATION OF A FRAUDULENT WITHDRAWAL FROM MY ANNUITY AND IGNORED ENTIRELY THAT THE "ACCOMMODATION" OFFERED ON SEPT. 15, 1992 BY LAURIE MOORE WAS A FRAUD

Very truly yours,

Stephen E. Klausner

SEK/dsd
cc: Tom Cavanaugh (w/enc.)
John Gundry (w/enc.)
Mike Parise (w/enc.
John Warms (w/enc.)

IT HAS BEEN MY EXPERIENCE THROUGHOUT THAT THE ONLY TIME N.J.E.A. PAID ATTORNEYS PRODUCE ANY DOCUMENTS IS WHEN THEY NEED TO CONCEAL THEIR ACTIONS.

A-74

Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718
908 495-2531

January, 26,1993

Genevieve M. Hawley
District Office Manager
Office of Congressman Pallone
I.R.I. Airport Plaza
Highway 36
Hazlet, New Jersey 07730

Dear Mrs. Hawley,

Since you have been so helpful up to this point in my dispute concerning the Edison Board of Education's refusal to observe the Americans with Disabilities Act I am again asking for your help.

In the latest letter from Lorene W. Moore she states that the Board of Education is very interested in resolving this dilemma. As you know this legal dispute has gone on since August and I feel that it can't be resolved until some questions are answered.I would like some help with these questions.

Have I been suspended without pay? I have had no hearing or notice of Board action. I have not received any of my paychecks since the beginning of the school year. Would it be appropriate that the Board would suspend my pay while refusing to provide reasonable accomidation as required by The Americans with Disabilities Act? Ms. Moore has repeatedly asked what accommodation is necessary continues to ask what accommodation is necessary and then ignores the information that is given to her by me, my attorney and my doctor. This could have been resolved prior to the start of school. I offered to mediate this problem in the summer but was refused.

Who authorized the Board of Education to remove my money from my annuity?

What was done with my paycheck for the first pay period? It was issued but not given to me even though I had inquired of my pay at two meetings with Ms. Moore.

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Were my medical records mishandled? It appears that Ms. Moore has not forwarded my records to Dr. Rieman as she stated to me. These are my records that I voluntarily supplied to the Chief Medical Inspector Dr. DeCastro. In view of the latest letter from Ms. Moore I can assume that she intends to attempt to cause additional delay in my seeing Dr. Rieman. I had that experience when I repeatedly tried to arrange to see Dr. DeCastro. I will arrange a appointment with Dr. Rieman by certified mail and will bring a representative from the teacher's association so that I will have a witness if Dr. Rieman behaves in the same manner as Dr. DeCastro did. I will ask in writing that Ms. Moore return my records from the Medical College of Pennsylvania to me so that I can discuss them with Dr. Rieman. I welcome the opportunity to discuss the issue of denying me medication by refusal to issue my prescription cards and the issues that relate to the damage to my health by the Boards actions. I will allow them to copy my records but they are my possession and were supplied at my cost; I'm sure the Board's representative Ms. Moore will not have any objection.

Why is the Board refusing to issue my Prescription card? Ms. Moore has been told repeatedly that my not having my card has caused me difficulty in obtaining medication for Narcolepsy, and has forced me at times to go without that medication. Surely Ms. Moore must remember the meeting in the Superintendent's office and her claim of ignorance of the problem. At that October 29, 1992 meeting she also promised to deliver them into my possession. In her latest letter to me she assumes that the one I have presently is in force, but it expired as they do each year. While the unemployment appeals hearing indicated that she was unaware of much about the operation of the school system I would think that someone in her position would at least know about the expiration date or at least investigate since she has been reminded so often that they are not in my possession.

Why would the Board transfer me to a position in which I have no experience and will likely damage my health and assign other staff who are without experience or the proper certification to teach the classes I had previously taught?

Why has the Board waited this long to resolve this problem? I offered as early as the middle of August to meet, mediate and supply information to Ms. Moore but she did not reply. Record of my disability dates back to 1984. Ms. Moore has requested the same information that I provided in August, the same information my attorney, my neurologist and I have repeatedly conveyed to her. This is another apparent attempt to conceal her conduct up to this point. Questions from me to Ms.Moore regarding the Computer Applications position that I should have been offered in May have been unanswered. Had Ms. Moore acted the Board could have avoided the costs of substitutes, special advisors to Ms. Moore at unemployment appeals hearings, and the filing of discrimination charges with the E.E.O.C.



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Here is the address of the President of the Edison Board of Education as you requested.

Dennis Pipala
President of the Edison Board of Education
148 Edison Avenue
Edison, New Jersey 08820

I again thank you for your help and am sure that my questions will now be answered. I have been informed that State Board of Education and the Justice Department should be made aware of this situation by the Americans with Disabilities Act Information Office.

Sincerely,

Edward Renaud

Edward Renaud

IN FACT NONE OF MY QUESTIONS WERE ANSWERED AND IN CIRCUMSTANCES WHERE MRS. HAWLEY HAD ADVISED ME TO WRITE THIS LETTER THERE WAS NO EFFORT MADE TO CONTACT THE N.J.E.A. PAID ATTORNEYS WHO REPRESENTED ME. CIRCUMSTANCES APPEAR THAT I WAS SHUFFLED OFF TO ATTORNEYS IN CONGRESSMAN PALLONE'S DISTRICT WHO CONTINUED THE COURSE OF ACTION THAT THE BOARD OF EDUCATION. E. T. E. A. AND THE ATTORNEY STEPHEN KLAUSNER HAD BEGUN IN AUGUST OF 1992. THEY REFUSED TO ASSIST ME IN FILING ANY COMPLAINT. REFUSED TO RESPOND TO MY REQUEST THAT ACTION BE TAKEN AND IGNORED EVIDENCE OF FRAUD MR. CAMPBELL WHO WAS A N.J.S.E.A. ATTORNEY PRACTICING SCHOOL LAW HANDED ME OVER TO SHARON LYNCH NORTON WHO CLAIMED TO BE KNOWLEDGEABLE OF THE A.D.A. HER CLAIM WAS TRUE IN THAT SHE WAS ABLE TO MAKE USE OF THAT LAW TO DELAY ANY FILING OF CHARGES OR THE FILING OF A LAWSUIT UNTIL AFTER THE BOARD HAD SUSPENDED ME WITHOUT PAY OR DUE PROCESS FROM SEPT. 1, 1992 THRU OCT. 15, 1993, REDUCED MY PAY AND SECURITY TO CORRECT THE FRAUD THAT BEGAN IN 1984. MRS. NORTON WHO IS THE LONG BRANCH CITY ATTORNEY CLAIMED AT A MEETING IN APRIL OF 1993 THAT WITH THE BOARD'S ATTORNEY, DR. KREISKEN, L. MOORE AND MR. FLOR AND MYSELF PRESENT THAT SHE KNEW VERY LITTLE OF SCHOOL LAW AND LATER STATED TO ME THAT AS A RELATED MATTER TO HER POSITION AS LONG BRANCH CITY ATTORNEY SHE DEALT WITH THE DISCIPLINE OF POLICE OFFICERS WHO ARE UNDER CIVIL SERVICE LAW. CONSIDERING THAT SCHOOL LAW AND CIVIL SERVICE LAW ARE STATED AS "PARI MATERIA" HER FAILURE TO ADDRESS A SUSPENSION WITHOUT PAY OR DUE PROCESS IS UNSUPPORTABLE AND INEXCUSABLE. AGAIN THE A.D.A. WAS USED AS A MEANS OF OBSTRUCTING MY RIGHTS. (A-77)

950437/000678

COMMITTEES:
PUBLIC WORKS AND TRANSPORTATION
MERCHANT MARINE AND FISHERIES
ARMS

REPLY TO:
WASHINGTON OFFICE:
213 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-3003
TELEPHONE: (202) 225-4671

FRANK PALLONE, JR.
3RD DISTRICT, NEW JERSEY

Congress of the United States
House of Representatives
Washington, DC 20515-3003

REPLY TO:
DISTRICT OFFICES:
☐ 540 BROADWAY (SUITE 110) LONG BRANCH, NJ 07740 (908) 571-0140
☐ 1110 FEDERAL BUILDING FORT DIX, NJ 08640-5003 (609) 894-1400
☐ 102 JUNIOR PLAZA (PUBLIC LIBRARY) MARLBORO, NJ 07726-1701 (908) 294-0104
☐ MONMOUTH COUNTY COURTHOUSE 220 E. MAIN STREET FREEHOLD, NJ 07728 (908) 431-1334

## CONGRESSIONAL INQUIRY AUTHORIZATION FORM

I authorize Congressman Frank Pallone to make full inquiry and receive complete information under the provisions of the PRIVACY ACT and the Freedom of Information Act with regard to my situation with the:

Edison Board of Education
(FILL IN THE NAME OF THE AGENCY OR ORGANIZATION)

Briefly, my problem is: I want to resolve my problem concerning my employment by the Edison Bd of Education. I have to bring this up to attorneys to bring this matter to an amicable settlement have proved fruitless. I am most hopeful to resolve the problem

NAME: EDWARD RENAUD

ADDRESS: 508 Fox Ave (NUMBER AND STREET) Belford (CITY) 07718 (ZIP)

TELEPHONE: HOME _____ WORK _____

SOCIAL SECURITY NUMBER [redacted]

IDENTIFICATION NUMBER CONCERNING THIS MATTER: _____
(VET.ADMIN...ALIEN REDGIS. OR OTHERS.)

SIGNATURE: Edward Renaud

DATE: 1-27 93

A-78

9504370069

BOARD OF EDUCATION
EDISON, NEW JERSEY
MIDDLESEX COUNTY

R. JOSEPH FERENCZI
BOARD ATTORNEY

PLEASE REPLY TO:
1660 LINCOLN HIGHWAY
P.O. BOX 988
EDISON, N.J. 08818-0988
908-985-1300
Fax: 908-985-2460

March 5, 1993

AMENDMENT OF 11/25/94
E. Renaud

Congressman Frank Pallone, Jr.
I.E.I. Airport Plaza
(Room 18) Highway 36
Hazlet, New Jersey 07730-1701

Re: Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Dear Congressman:

Your letter dated February 3, 1993 addressed to Mr. Dennis Pipala, President, Edison Board of Education, was referred to me for reply.

(1) It would be inappropriate for me to respond to your inquiry in view of the fact that Mr. Renaud has threatened litigation. Rather, I suggest you communicate with his attorney who is Thomas W. Cavanaugh, Jr., Esq., 268 Norwood Avenue, Long Branch, New Jersey 07764, telephone number 229-3200. MR. CAVANAUGH AND HIS ASSOCIATE HAD STATED THAT THEY WOULD ACT TO RETURN ME TO EMPLOYMENT, DESPITE THAT STATEMENT THEY TOOK NO ACTION TO END A SUSPENSION W/O PAY OR DUE PROCESS.

(2) I might add, however, that the Board has extended itself in accommodating Mr. Renaud's disability.

Sincerely,

R. JOSEPH FERENCZI

RJF:dk

(1) I DID NOT INITIATION LITIGATION; THE N.J.E.A AND ATTORNEY MR. STEPHEN KLAUSNER WOULD NOT TAKE ANY ACTION TO PROTECT MY RIGHTS AND WAS CONCERNING CONSPIRACY AND FRAUD FROM 1984 AND WAS ACTING TO OBSTRUCT MY RIGHTS, MR. FERENCZI WAS PARTY TO THAT CONSPIRACY.

(2) THE BOARD HAD AT NO TIME ACTED TO ACCOMMODATE MY DISABILITY BUT CONTINUED TO CONSPIRE WITH THE E.T.F.A. AND N.J. EA. ATTORNEY TO CONCEAL OBSTRUCTION OF MY RIGHTS ORIGINATING IN 1984. THE ONLY "ACCOMMODATION" OFFERED WAS THE LETTER OF SEPT. 15, 1992 WHICH IS A FRAUDULENT OFFER AND A ATTEMPT TO COERCE ME TO VIOLATE MY RIGHTS UNDER N.J.S.A. 18A 6-10. IN THIS INSTANCE MR FERENCZI LIED IN HIS REPLY

A-79

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FRANK PALLONE, JR.
6TH DISTRICT, NEW JERSEY

Congress of the United States
House of Representatives
Washington, DC 20515-3006

March 23, 1993

ENCLOSURE OF 11/25/94
E. Renaud.

Mr. Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Dear Mr. Renaud:

Just a short note to pass along a copy of the attached response I received from the Edison Board of Education.

I trust this letter is self-explanatory and regret I could not pass along a more favorable report.

With best regards, I am

Sincerely,

Frank Pallone, Jr.

FRANK PALLONE, JR.

FP/gh
Enc.

MR. FRANCZI REFUSED TO REPLY TO CONTINUE TO CONCEAL OBSTRUCTION OF MY RIGHTS BY THE BOARD OF EDUCATION AND ATTORNEYS PAID BY THE N.J.E.A.

A-80

PRINTED ON RECYCLED PAPER

9504370071

LIFE AND HEALTH INSURANCE GROUP HEALTH AND BLANKET INSURANCE, N.J.S.A. 17B:27-44 TIME OF BENEFIT PAYMENT

THERE SHALL BE A PROVISION THAT ALL BENEFITS PAYABLE UNDER THE POLICY OTHER THAN BENEFITS FOR LOSS OF TIME WILL BE PAYABLE NOT MORE THAN 60 DAYS AFTER RECEIPT OF PROOF, AND THAT SUBJECT TO DUE PROOF OF LOSS. ALL ACCRUED BENEFITS PAYABLE UNDER THE POLICY FOR LOSS OF TIME WILL BE PAID NOT LATER THAN AT THE EXPIRATION OF EACH PERIOD OF 30 DAYS DURING THE CONTINUANCE OF THE PERIOD FOR WHICH THE INSURER IS LIABLE, AND THAT ANY BALANCE REMAINING UNPAID AT THE TERMINATION OF SUCH PERIOD WILL BE PAID UPON RECEIPT OF SUCH PROOF.

N.J.S.A. 17B:30-13.1.

NO PERSON SHALL ENGAGE IN UNFAIR CLAIM SETTLEMENT PRACTICES IN THIS STATE. UNFAIR CLAIM SETTLEMENT PRACTICES SHALL BE UNFAIR PRACTICES AS DEFINED IN N.J.S.A 17B:30-2 SHALL INCLUDE THE FOLLOWING PRACTICES:

COMITTING OR PERFORMING WITH SUCH FREQUENCY AS TO INDICATE A GENERAL BUSINESS PRACTICE ANY OF THE FOLLOWING.

CITING HERE THE SPECIFIC PARTS OF N.J.S.A 17B:30-13.1.

a. MISREPRESENTING PERTINENT FACTS OR INSURANCE POLICY PROVISIONS RELATING TO COVERAGES AT ISSUE. (AND SEE PAGE A-84)

- LETTER OF MARCH 19, 1992; HERE CHRISTINE KAMPA SUPPORTS THE BOARDS ACTIONS CLAIMING THAT I HAD SUBMITTED A CLAIM UNDER THE COORDINATED SICK LEAVE POLICY I HOLD. I HAD NOT SUBMITTED A CLAIM UNDER THAT POLICY OR IN ANY INSTANCE REQUESTED "SICK LEAVE" FROM THE BOARD OF EDUCATION. MISS KAMPA APPARENTLY WAS WILLING TO ACCEPT INFORMATION SUBMITTED BY THE BOARD REGARDING "SICK LEAVE" WHICH IS PREDICATED ON THE ACCUMMULATION OF SICK DAYS AS OF JAN 1, 1995 I CANNOT OBTAIN ANY DOCUMENTS FROM THE BOARD ON THAT ISSUE. HERE THE "FACTS"



950437001/02

OF MY CLAIM ARE INTENTIONALLY MIS-REARESENTED, I WAS IN FACT SUSPENDED WITHOUT PAY OR DUE PROCESS TO COERCE ME TO END MY EMPLOYMENT TO CONCEAL CONSPIRACY AND FRAUD. (SEE PAGE )

b. "FAILING TO ACKNOWLEDGE AND ACT REASONABLY PROMPTLY UPON COMMUNICATIONS WITH RESPECT TO CLAIMS ARISING UNDER INSURANCE POLICIES"

- IN REPEATED INSTANCES WASHINGTON NATIONAL RESPONDED ONLY WHEN I CONTACTED THEM. THE ONLY TIME THEY ORIGINATED CORRESPONDENCE WAS TO CREATE THE RESPONSE REFERENCED ABOVE, OR TO HARASS ME BY DEMANDING CLAIM FORMS IN CIRCUMSTANCES WHERE MY PHYSICIAN, DR. REVILO REFUSED TO COMPLETE CLAIM FORMS.

d. "REFUSING TO PAY CLAIMS WITHOUT CONDUCTING A REASONABLE INVESTIGATION BASED UPON ALL AVAILABLE INFORMATION;"

- MS. HAMP MADE NO INVESTIGATION OF THE BOARD'S ACTIONS THAT I AM AWARE OF, NOTABLY IN MARCH OF 1993 THE ATTORNEY SHARON NORTON STATED TO ME THAT WASHINGTON NATIONAL HAD A "CAUSE OF ACTION" TO SUE THE BOARD FOR CREATING A DISABILITY CLAIM. THIS WAS CONFIRMED BY THE E.E.O.C. DISTRICT OFFICE IN PHILADELPHIA A YEAR LATER. AFTER THE ORIGINAL DISCUSSION MRS NORTON'S OPINION WAS THAT WASHINGTON NATIONAL'S ACTIONS HAD NOTHING TO DO WITH THE CONSPIRACY TO OBSTRUCT MY RIGHTS.

P. "NOT ATTEMPTING IN GOOD FAITH TO EFFECTUATE PROMPT, FAIR, AND EQUITABLE SETTLEMENT OF CLAIMS IN WHICH LIABILITY HAS BECOME REASONABLY CLEAR;"

- RATHER THAN PAY THE CLAIM THEY ACTED TO HARASS ME, DEMANDED DUPLICATION OF INFORMATION AND DECIDED THAT DESPITE MY FOLLOWING MY DOCTOR'S INSTRUCTIONS I WAS NOT UNDER HER CARE.



9504370070 03

n. FAILING TO PROMPTLY PROVIDE A REASONABLE EXPLANATION OF THE BASIS IN THE INSURANCE POLICY IN RELATION TO THE FACTS OR APPLICABLE LAW FOR DENIAL OF A CLAIM OR FOR THE OFFER OF A COMPROMISE SETTLEMENT.

- IN RESPONSE TO MY FILING A COMPLAINT WITH THE N. J. DIV. ON CIVIL RIGHTS. WASHINGTON NATIONAL AS A CONSPIRING PARTY RETALIATED BY WITHOLDING BENEFITS DUE ME FOR 20 DAYS AND HAS NEVER EXPLAINED THEIR ACTIONS.

AND AGAIN IN REFERENCE TO N.J.S.A. 17B:27-44 PREVIOUSLY CITED:

WHEN WASHINGTON NATIONAL PAID ON THIS DISABILITY CLAIM ON FEB. 1, 1993 THEY PAID ONLY TO THE DATE OF DEC. 12, 1992 WITHOLDING PAYMENT DUE FOR THE DAYS FROM DEC. 12, THRU FEB. 1, 1993 IN THE AMOUNT OF $2,909.00. THAT AMOUNT WAS PAID ONLY WHEN I VISITED THEIR CLERK, N.J. OFFICE AND QUESTIONED WHETHER THEY WERE PARTICIPATING IN DISCRIMINATION WITH THE BOARD OF EDUCATION. AT THAT TIME I DID NOT REALIZE THAT THE E.T.E.A. WAS A CONSPIRING PARTY SINCE 1984 TO OBSTRUCT MY RIGHTS. IN CORRESPONDENCE WITH MRS. NORTON I ASKED A QUESTION AS TO WHY N.J.E.A PAID ATTORNEYS COULD NOT PROTECT ME FROM THE ACTIONS OF THE N.J.E.A. ENDORSED DISABILITY INSURER; IN RETROSPECT THE ANSWER IS CLEAR. ATTORNEYS PAID BY THE N.J.E.A. WERE PROTECTING THE PARTIES INVOLVED IN OBSTRUCTING MY RIGHTS.

THE BOARD'S SUSPENDING ME IN SEPT. OF 1992 ALSO SERVED WASHINGTON NATIONAL'S INTEREST IN THAT I WAS UNABLE TO RAISE MY INSURANCE LEVEL OR ELECT ADDITIONAL PLANS DURING THE OPEN ENROLLMENT PERIOD THAT OCCURS AT 5 YEAR INTERVALS, AND AS PREVIOUSLY STATED, ENDING MY EMPLOYMENT OR BREACHING IT WOULD END MY DISABILITY INSURANCE (SEE PAGE A-85)



9504370004

DATE RE-ATTACHED BY JAN. 7 1993, VII. DELETED BY NAVIS
E.R.

WASHINGTON NATIONAL INSURANCE COMPANY
PURANCTON, ILLINOIS. 60201

DATE OF LETTER IS OCT. 11, 1992

TO WHOM IT MAY CONCERN.

THIS DISIBILITY CLAIM IS THE RESULT OF REFUSAL BY THE EDISON SCHOOL SYSTEM TO GRANT REASONABLE ACCOMIDATION REQUIRED BY MY CONDITIONS NARCOLEPSY AND DIABETES. THESE CONDITIONS REQUIRE ACCOMIDATIONS THAT ARE REQUIRED BY BOTH STATE AND FEDERAL LAW.

IF THERE ARE FURTHER QUESTIONS PLEASE CONTACT ME OR MY ATTORNEY

EDWARD RENAUD 908 495-2531 OR 908 508 9929
MR. KLAUSNER. ATTORNEY 908 685-1552

DELAY IN FILING THIS CLAIM IS ALSO THE RESULT OF INACTION ON THE PART OF THE EDISON SCHOOL SYSTEM IN RESOLVING REASONABLE ACCOMIDATION.

SINCERELY

Edward Renaud

THE RESPONSE OF WASHINGTON NATIONAL IN THIS CLAIM BEGINNING ON SEPT. 2. 1992 AND CONTINUING THRU OCT. 15. 1993 WAS TO VIOLATE STATE INSURANCE LAW ON TIMELY PAYMENT OF CLAIMS. RETALIATION AND HARASSMENT. N.J.E.A. AND ATTORNEYS REFUSED TO ADDRESS THEIR ACTIONS, AND IN DOING SO SUPPORTED THEIR ACTIONS.

NOV 16 1992

NOV. 16, 1992

A-87

0504370045

DOCUMENT 22

| 1. YOUR NAME | 2. PLAN NUMBER | 3. CERTIFICATE NO. | 4. SOC. SEC. NO. OR I.D. NO. |
|---|---|---|---|
| EDWARD RENAUD | 4587 | 6003 | 150-42-1424 |

| 5. EMPLOYER (SCHOOL SYSTEM) | (CITY OR COUNTY) | (STATE) | 6. ANNUAL SALARY |
|---|---|---|---|
| EDISON BOARD OF EDUCATION | EDISON, N.J. | N.J. | $ 58,867.00 |

| 7. PROFESSIONAL DUTIES | IF "OTHER", GIVE SPECIFIC OCCUPATION. | 8. RETIRED | 9. DATE RETIRED |
|---|---|---|---|
| ☒ TEACHER ☐ PRINCIPAL ☐ SUPT. ☐ OTHER | | ☐ YES ☒ NO | |

| 10. HAVE YOU BEEN GRANTED AN OFFICIAL LEAVE OF ABSENCE? | IF "YES", GIVE DATES | 11. OPENING AND CLOSING DATES OF YOUR SCHOOL TERM. |
|---|---|---|
| ☐ YES ☒ NO | FROM TO | SEPT. 1 TO JUNE 30, 19 |

| 12. REASON FOR LEAVE OF ABSENCE. | 13. NUMBER OF DAYS OF REGULAR SICK LEAVE WITH PAY TO WHICH YOU WERE ENTITLED AT THE START OF YOUR PRESENT DISABILITY. |
|---|---|
| | 75 |

| 14. WHAT IS THE NATURE OF YOUR ILLNESS OR INJURY? | DOES YOUR EMPLOYER MAKE ANY CONTRIBUTION TO THE PREMIUM FOR THIS DISABILITY INSURANCE PLAN? |
|---|---|
| NARCOLEPSY. DIABETES. | ☐ YES ☒ NO IF "YES", WHAT PERCENTAGE ☐ 100% OTHER ____ % |

15. IF INJURED, GIVE DATE AND DESCRIBE WHERE AND HOW ACCIDENT OCCURRED.

| 16. GIVE NAMES OF ALL PHYSICIANS CONSULTED. | 17. GIVE DATE OF FIRST TREATMENT. |
|---|---|
| DR. JUNE FRY. | NOVEMBER 19 |

| 18. ON WHAT DATE AND TIME DID YOU STOP WORK? | 19. ON WHAT DATE DID YOU RESUME WORK? |
|---|---|
| SEPT. 2 19 92 7:45 A.M. P.M. | I HAVE NOT RESUMED WORK. |

| 20. CONFINED TO HOUSE? | IF "YES", GIVE DATES. | 21. IF HOSPITAL CONFINED, ATTACH THE HOSPITAL BILL TO THIS REPORT. |
|---|---|---|
| ☐ YES ☒ NO | FROM TO | |

22. ANSWER THIS QUESTION IF YOUR DISABILITY COMMENCED DURING OR CONTINUES INTO A SCHEDULED VACATION PERIOD:

WHAT WAS THE FIRST DATE YOU COULD HAVE RETURNED TO WORK IF SCHOOL WERE IN SESSION? INDEFINITE

I HEREBY AUTHORIZE ANY PHYSICIAN, HOSPITAL, INSURANCE COMPANY, EMPLOYER, OR ORGANIZATION TO RELEASE ANY INFORMATION REGARDING THE MEDICAL HISTORY, TREATMENT, DISABILITY, OR BENEFITS PAYABLE FOR THIS CLAIM, TO THE WASHINGTON NATIONAL INSURANCE COMPANY. A PHOTOSTAT OF THIS AUTHORIZATION SHALL BE AS VALID AS THE ORIGINAL.

DATED OCT. 28 19 92 SIGNED Edward Renaud.

STREET 508 FOX AVE. CITY BELFORD. STATE N.J. ZIP CODE 07718

NOTE: "ANY PERSON WHO KNOWING AND WITH INTENT TO DEFRAUD ANY INSURANCE COMPANY OR OTHER PERSONS, FILES A STATEMENT OF CLAIM CONTAINING ANY MATERIALLY FALSE INFORMATION, OR CONCEALS FOR THE PURPOSE OF MISLEADING, INFORMATION CONCERNING ANY FACT, MATERIAL THERETO, COMMITS A FRAUDULENT INSURANCE ACT, WHICH IS A CRIME, SUBJECT TO CRIMINAL PROSECUTION AND CIVIL PENALTIES."

## NON-DISABILING INJURY

NOV 16 1992

IF A CLAIM IS FOR AN INJURY, WHICH DID NOT CAUSE LOSS OF TIME FROM TEACHING AND PAYMENT IS DESIRED FOR MEDICAL EXPENSE, IN LIEU OF OTHER BENEFITS, AS PROVIDED BY THE POLICY, REPORT FULLY AS INDICATED BELOW.

THIS BLANK IS TO BE COMPLETED BY YOURSELF AND ATTENDING PHYSICIAN. IN ADDITION, HAVE THE PHYSICIAN INDICATE IN HIS REPORT HIS CHARGE FOR THE TREATMENT GIVEN.

FE10-1

PLT 2052

**PART A** — TO BE COMPLETED BY PATIENT (INSURED)

SPACES FOR TYPEWRITER – MARKS FOR TABULATOR APPEAR BELOW

PATIENT'S NAME AND ADDRESS: EDWARD RENAUD 508 FOX AVE 25 FORD N.S.

DATE OF BIRTH: AUG 21, 1951

AUTHORIZATION TO RELEASE INFORMATION: I HEREBY AUTHORIZE THE UNDERSIGNED PHYSICIAN TO RELEASE ANY INFORMATION ACQUIRED IN THE COURSE OF MY EXAMINATION OR TREATMENT.

SIGNED (PATIENT): Edward Renaud DATE: OCT. 26, 1992

**PART B** — ATTENDING PHYSICIAN'S STATEMENT

1. DIAGNOSIS AND CONCURRENT CONDITIONS. (IF DIAGNOSIS CODE OTHER THAN ICDA* USED, GIVE NAME): Narcolepsy with Cataplexy and Obstructive sleep apnea

2. IS CONDITION DUE TO INJURY OR SICKNESS ARISING OUT OF PATIENT'S EMPLOYMENT? ☐ YES ☒ NO

3. PREGNANCY? ☐ YES ☐ NO

4. IF "YES" APPROXIMATE DATE PREGNANCY COMMENCED. DATE

5. REPORT OF SERVICES (OR ATTACH ITEMIZED BILL) (IF PREVIOUS FORM SUBMITTED TO THIS CARRIER, YOU NEED SHOW ONLY DATES AND SERVICES SINCE LAST REPORT)

| DATE OF SERVICES | PLACE OF SERVICE(S) | DESCRIPTION OF SURGICAL OR MEDICAL SERVICES RENDERED | PROCEDURE CODE – IF USED** (IF CODE OTHER THAN CPT** USED, GIVE NAME) | CHARGES |
|---|---|---|---|---|
| (BILL MAILED UNDER SEPARATE COVER TO ABOVE ADDRESS) | | | | |

PO – DOCTOR'S OFFICE; IN – INPATIENT HOSPITAL; NH – NURSING HOME; H – PATIENT'S HOME; OH – OUTPATIENT HOSPITAL; OL – OTHER LOCATIONS

*ICDA – INTERNATIONAL CLASSIFICATION OF DISEASES

**CPT – CURRENT PROCEDURAL TERMINOLOGY (CURRENT EDITION)

TOTAL CHARGES ▶ $

AMOUNT DUE ▶ $

BALANCE DUE ▶ $

6. DATE SYMPTOMS FIRST APPEARED OR ACCIDENT HAPPENED. Early in 1984

7. DATE PATIENT FIRST CONSULTED YOU FOR THIS CONDITION. OFFICE 11/8/84 HOME

8. PATIENT EVER HAD SAME OR SIMILAR CONDITION? ☐ YES ☒ NO IF "YES", WHEN AND DESCRIBE:

9. PATIENT STILL UNDER YOUR CARE FOR THIS CONDITION? ☒ YES ☐ NO IF "NO", DATE SERVICE TERMINATED 19

10. PATIENT WAS CONTINUOUSLY TOTALLY DISABLED (UNABLE TO WORK). FROM 9-2-92 THRU Unknown

11. PATIENT WAS WAS PARTIALLY DISABLED. FROM THRU

12. IF STILL DISABLED, DATE PATIENT SHOULD BE ABLE TO RETURN TO WORK Unknown 19

13. IF SCHOOL HAD BEEN IN SESSION, WHAT DATE COULD PATIENT HAVE RETURNED TO WORK? 19

14. DOES PATIENT HAVE OTHER DISABILITY COVERAGE? ☐ YES ☒ NO IF "YES", PLEASE IDENTIFY.

DATE: 11-11-92

PHYSICIAN'S NAME (PRINT): June M. Fry

INDIVIDUAL PRACTITIONERS – SS No.

ALL OTHERS – EMPLOYER I. D. No.

MUST BE FURNISHED UNDER AUTHORITY OF LAW

PHYSICIAN'S SIGNATURE: June M Fry MD

DEGREE: MD

TELEPHONE: 215-842-4250

ADDRESS (STREET): 3200 Henry Ave

CITY: Phila

STATE: PA

ZIP CODE: 19129

A-89

EDWARD RENAUD
508 FOX AVE.
BELFORD N.J. 07718
908-495-2591

APRIL 13, 1993

JOHN GUNDRY, PRESIDENT
EDISON TOWNSHIP EDUCATION ASSOCIATION.
2 ETHEL ROAD
SUITE 203-A
EDISON, NEW JERSEY 08817

DEAR MR. GUNDRY,

AS I MENTIONED TO YOU IN OUR CONVERSATION OF 4-12-93 AT THE ETEA. OFFICE I WISH TO FILE A GRIEVANCE ON THE MATTER OF MY SENIORITY. IT HAS BECOME APPARENT THAT THE SENIORITY LIST MADE UP BY EDISON BOARD OF EDUCATION WAS ALTERED BY THEM AND DOES NOT COMPLY WITH N.J.S.A. 11A:5-9. THIS SENIORITY LIST HAS CONSIDERABLE BEARING IN MY SUIT AGAINST THE EDISON BOARD OF EDUCATION.

THE PARTICULAR IMPORTANCE OF THIS ISSUE IS:

1. THAT EDISON HAS SOUGHT TO DISCRIMINATE AGAINST ME AT LEAST SINCE SEPT. 25, 1986 WHEN NJSA 11A:5-9 BECAME EFFECTIVE.
2. THAT BY ASSIGNING ME TO A POSITION FOR THE 1991-1992 SCHOOL YEAR WHICH WAS A 4/5 PART TIME POSITION MY SENIORITY WAS DAMAGED AND I WAS DEPRIVED OF MY PAY FOR THE 1/5 OF MY SALARY IN THE AMOUNT OF $11,152.15
3. THAT FOR THE 1992-1993 SCHOOL YEAR I WAS ASSIGNED PURPOSELY TO A POSITION IN WOODROW WILSON MIDDLE SCHOOL, THAT ACCOMMODATED TO MY DISABILITY WAS DENIED THROUGHOUT THAT SCHOOL YEAR. THIS USE OF A ALTERED SENIORITY LIST IS THE BASIS FOR MY COMPLAINT AGAINST THE EDISON BOARD OF EDUCATION.

PROPER USE OF THE CORRECT LIST WOULD HAVE RETURNED ME FROM REDUCTION IN FORCE TO THE POSITION VACATED BY THE RETIREMENT OF JIM LYNCH IN JULY. THAT POSITION IS CURRENTLY THAT OF RALPH VENTOLA WHO IS INCORRECTLY SHOWN ON THE LIST WE EXAMINED ON APRIL 12, 1993 AS HAVING MORE SENIORITY THAN I HAVE.

I WILL AMEND MY COMPLAINT FILED WITH THE DIVISION OF CIVIL RIGHTS REGARDING THIS MATTER AND EXPECT THAT I WILL HAVE GROUNDS TO BRING ACTION AGAINST THE EDISON BOARD OF EDUCATION REGARDING THE LOSS OF PAY CAUSED BY THIS ALTERATION OF THE LIST.

YOU CAN REGARD THIS LETTER AS A FILING OF A GRIEVANCE ON ALL OF THESE ISSUES. AT THIS POINT THE VIOLATION OF MY RIGHTS BY THE EDISON BOARD OF EDUCATION HAS BEEN EXTENSIVE; THEY HAVEN'T MISSED MUCH. THEY HAVE VIOLATED OUR CONTRACT, STATE LAW, AND FEDERAL LAW AND DONE IT REPEATEDLY.

AND WITH REGRET I MUST ADD THAT I WAS TOLD BY LARRY WHITE WHO WAS THE GRIEVANCE CHAIRPERSON IN 1986 THAT MY SENIORITY POSITION WAS CHANGED AS A RESULT OF A JUDICIAL DECISION AND THAT THERE WAS A LAW PASSED GIVING VETERANS ADDITIONAL SENIORITY. I ASKED TO SEE THAT LAW AND WAS NEVER GIVEN THE OPPORTUNITY. I ALSO ASKED MR. WHITE ABOUT FILING A GRIEVANCE ON THE MATTER AND WAS TOLD THAT I HAD NO BASIS FOR A GRIEVANCE.

I'VE HAD THIS LAW RESEARCHED BY SOMEONE WITH CONSIDERABLE EXPERTISE IN LEGAL RESEARCH AND THE ATTACHED COPY OF N.J.S.A. 11:A 5-9 IS IN FORCE. I'VE BEEN DENIED MY PROPER PLACE ON THE SENIORITY LIST SINCE AT LEAST 1986.

AS STATED THEIR WAS NO GRIEVANCE FILED, APPARANTLY I HAD COME TOO CLOSE TO THE ACTUAL CAUSE FOR THE BOARD AND E.T.E.A.'s ACTIONS IN 1992 TO SUSPEND ME WITHOUT PAY OR DUE PROCESS.

I HAVE THE DATE OF THE ORIGIN OF THE CONSPIRACY WRONG AND MY CITE IS WRONG. I WAS CORRECT THAT FEDERAL AND STATE LAWS WERE VIOLATED EXTENSIVELY.

SINCERELY,

Edward Renand.

EDWARD RENAND

Edward Renand.

A-95

950437009

Public Schools of Edison Township
100 Municipal Boulevard • Edison, New Jersey 08817
Tel: (908) 287-4400 Fax: (908) 287-4865

DR. JOSEPH A. KINNEY
SUPERINTENDENT

DANIEL P. MICHAUD
BUSINESS ADMINISTRATOR/BOARD SECRETARY

April 6, 1994

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

The Board of Education is presently reviewing the table of organization for school year 1994-95. Because the total number of positions available cannot be determined at this time due to staff members returning from various leaves of absences, financial constraints, and enrollment trends, it may be necessary to terminate some individuals. Please be aware that this notice is being sent to all non-tenured staff members and some tenured staff members.

Therefore, in order for the Board to comply with the deadline established by New Jersey statutes and contractual notice requirements, I must inform you that your name will be presented at the next regular Board of Education Meeting as a possible employee who will not be offered a renewal contract for the 1994-95 school year. This meeting will be held on Monday, April 11, 1994 in Thomas Jefferson Middle School at 8:00 p.m. The Board plans to meet in Executive Session immediately after the public session to approve the list of professional staff members to be notified of non-renewal of contract.

You have a right to request that any such discussion and decision regarding your employment be made in public session rather than private session. If that is your intention, please notify this office and confirm in writing no later than 12:00 noon on April 8, 1994. If we do not hear from you, the discussion will be in private. Formal action will be taken at the scheduled Board Meeting on Monday, April 11, 1994.

Sincerely,

DR. VINCENT J. CAPRARO
Acting Assistant Superintendent

VJC/jm

AS IN 1993 EVENTS APPEAR TO BE UNUSUAL REGARDING THE ONE OPPORTUNITY I WOULD BE ALLOWED TO "STATE MY CASE IN PUBLIC". THE DATE OF APRIL 11, 1994 COINCIDED WITH THE DAY THAT MY ELDERLY MOTHER WAS SCHEDULED FOR CATARACT SURGERY. APRIL 4, 1994 WAS THE DATE OF A RE-SCHEDULING OF HER SURGERY IN A SITUATION WHERE A NEIGHBOR OF MY MOTHER'S HAD INVEYED HER TO RE-SCHEDULE HER SURGERY SO THAT IT COULD BE DONE BY A SPECIFIC DOCTOR. OVER A PERIOD OF 2½ YEARS DOCTORS, HEALTH CARE AND QUESTIONABLE COINCIDENCES HAVE BECOME REPEATED COMMON FACTORS.

A-96



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# PART 3

## ON THE ACTIONS OF THE ATTORNEYS
## SHARON LYNCH NORTON
## THOMAS CAVANAGH

# On the Actions of Sharon Lynch Norton

THE MATERIAL HERE IS A PORTION OF A FILING IN ANOTHER JURISDICTION: IT ADDRESSES THE ACTIONS OF MRS. NORTON, AND ALSO REFERENCES THE ACTIONS OF HER ASSOCIATE MR THOMAS CAVANAGH. THESE TWO ATTORNEYS ACTED IN THE INTEREST OF THE CONSPIRING PARTIES AND PARTICIPATED IN THAT CONSPIRACY AS PART OF A POLITICAL BARGAIN WHERE IN RETURN FOR CONCEALING CRIMINAL ACTIVITY THE PARTIES INVOLVED WOULD REPAY THE MONMOUTH COUNTY DEMOCRATIC PARTY BY ASSURING THAT CONGRESSMAN PALLONE WOULD RUN OPPOSED IN THE 1994 DEMOCRATIC PRIMARY. MIDDLESEX COUNTY WOULD NOT SUPPORT A CANDIDATE IN THE PRIMARY SAVING THE DEMOCRATIC PARTY IN MONMOUTH CONSIDERABLE TIME AND EXPENSE. IN TIME I HAVE COME TO UNDERSTAND WHY I HAVE HAD NO RIGHTS FOR 2½ YEARS; EDISON, MY EMPLOYER IN MIDDLESEX COUNTY, HAD SOLD THEM TO MONMOUTH COUNTY SOLIDIFYING POLITICS IN THE SIXTH DISTRICT. APPARANTLY THE NEW JERSEY EDUCATION ASSOC. PAID THE ATTORNEYS NOT TO PROTECT MY RIGHTS, THEY WERE THE BROKERS AND BENEFITED IN THE DEAL, AND HAVE DESTROYED 2½ YEARS OF MY LIFE AS PART OF THE BARGAIN.

THIS PORTION REFERENCES MY PAGES DESIGNATED G1 THRU. G-73.

THE ATTORNEY SHARON LYNCH NORTON REFUSED TO ACT OR ADVISE ME IN ANY WAY REGARDING A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS. SHE CONCEALED THAT HER INTEREST IN THIS MATTER WAS TO SUPPRESS EVIDENCE OF CRIMINAL ACTIVITY BY THE EDISON TOWNSHIP BOARD OF EDUCATION AND THE EDISON TOWNSHIP EDUCATION ASSOCIATION WHO HAD CONSPIRED TO OBSTRUCT MY RIGHTS TO EMPLOYMENT AS A TENURED TEACHER. SHE REFUSED TO DISCUSS OR ACT UPON ANY OF THE DOCUMENTS OR EVIDENCE THAT I HAD OBTAINED UNASSISTED AND ON MY OWN INVESTIGATION. SHE CONTINUED THE MALICIOUS MISUSE OF THE LEGAL PROCESS STARTED IN SEPTEMBER OF 1992 WHEN THE BOARD OF EDUCATION AND EDISON TOWNSHIP EDUCATION

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AGAIN CONSPIRED TO END MY EMPLOYMENT AND REPEATEDLY ENGAGED IN FRAUDULENT REPRESENTATIONS TO ACHIEVE THAT END.

MRS. NORTON'S ACTIONS WERE TO REFUSE TO DISCUSS ANY REASONED COURSE OF ACTION; SHE REFUSED TO DISCUSS ANY OF THE INFORMATION AND DOCUMENTATION THAT I BROUGHT TO HER. SHE REFUSED TO ASSIST ME IN OBTAINING THE EMPLOYMENT INFORMATION THAT IS IN MY FILE WHICH IS MY RIGHT UNDER SCHOOL LAW. SHE REFUSED TO DISCUSS THE ACTIONS OF THE BOARD OF EDUCATION IN COERCING ME TO BE EXAMINED BY THE BOARD'S DOCTOR OR THE FACT THAT THE DOCTOR NEVER ISSUED ANY FINDING. SHE REFUSED TO DISCUSS THE CONSTITUTIONAL VIOLATIONS OF MY RIGHT TO PRIVACY, TO DUE PROCESS AND EQUAL PROTECTION UNDER THE LAW.

MRS. NORTON'S POSITION WAS TO SUPPORT THE ACTIONS OF THE BOARD. THEY ACTED TOGETHER TO DAMAGE ME FINANCIALLY, ABROGATE THE PREVIOUS CONSPIRACY DATING FROM 1984, AND ABROGATE ANY ACTION I MIGHT HOPE TO TAKE AGAINST THE PARTIES INVOLVED IN CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS.

ONLY RECENTLY HAVE I COME TO UNDERSTAND THAT IN JANUARY OF 1993 I WAS REFERRED TO THE LAW FIRM OF CHAMLIN ROSEN, CAVANAGH AND ULIANO. THE REFERRAL TO THAT LAW FIRM CAME FROM A TEACHER WHO HAD BENEFITED IN 1984 WHEN THE BOARD AND E.T.E.A. HAD USED A FRAUDULENT SENIORITY LIST TO BEGIN WHAT IS NOW 10 YEARS OF ACTIONS TO END MY EMPLOYMENT. THE REFERRAL CAME FROM RALPH VENTOLA WHO ADVANCED IN SENIORITY TO THE POSITION ABOVE MINE ON THE FRAUDULENT LIST. I WAS SURPRISED THAT MRS NORTON CLAIMED EXPERTISE IN THE A.D.A. AND MR. CAVANAGH WAS A N.J.E.A. SCHOOL LAW ATTORNEY. I HAD BEEN A VICTIM OF A FRAUD AGAIN, ONE THAT INCLUDED MRS. GENEVIEVE HAWLEY WHO WAS THE DISTRICT OFFICE MANAGER IN CONGRESSMAN PALLONE'S HAZLET OFFICE WHO HAD BEEN PROVIDING SOME ADVICE AND ASSISTANCE UNTIL I FOLLOWED HER INSTRUCTIONS AND WROTE TO THE BOARD OF EDUCATION PRESIDENT, DENNIS PIPALA. (LETTERS RELATING TO THIS MATTER PAGES A-75 TO A-80) APPARENTLY AFTER I WROTE THAT

LETTER POLITICAL CORRUPTION AGAIN INFLUENCED THE ACTIONS OF THE PARTIES INVOLVED IN CONSPIRACY AND I WAS "SET-UP" TO GO TO ATTORNEYS WHO DID NOT PROTECT MY RIGHTS UNDER ANY LAW. I CAN SUPPORT THE ALLEGATION THAT MRS. NORTON AND MR CAVANAGH SAW AND ACTED ON THE OPPORTUNITY TO ASSURE THAT CONGRESSMAN PALLONE WOULD NOT FACE A PRIMARY FIGHT IN MAY OF 1992 BETWEEN THE 2 COUNTIES THAT HAD BECOME RIVALS FOR POWER IN THE SIXTH CONGRESSIONAL DISTRICT. REP. PALLONE'S MONMOUTH COUNTY POLITICAL ORGANIZATION APPARANTLY AGREED TO ACT TO ELIMINATE OR LIMIT ANY LEGAL ACTION OR PUNITIVE DAMAGES TO THE BOARD, E.T.E.A., N.J.E.A., WASHINGTON NATIONAL INSURANCE COMPANY, VALIC ANNUITY. OR ANY OF THE NUMEROUS PARTIES INVOLVED IN CONSPIRING TO OBSTRUCT MY RIGHTS AND THE OTHER PARTIES WHO HAVE EXPERIENCED LIKE DISCRIMINATION. THE ATTORNEY'S SHARON LYNCH NORTON AND THOMAS CAVANAGH HAD EFFECTIVELY PURCHASED A PRIMARY AND MIDDLESEX COUNTY'S POLITICAL SUPPORT BY AGREEIN TO CONCEAL CONSPIRACY TO OBSTRUCT MY RIGHTS. DATING FROM 1984 UNDER THE N.J. L.A.D., AS A TENURED TEACHER AND, IN 1992 UNDER FEDERAL LAW, THE AMERICAN'S WITH DISABILITIES ACT.

AS OF THE PRESENT THE PARTIES INVOLVED HAVE ARRANGED CRIME AND CORRUPTION THROUGHOUT AGENCIES OF THE STATE AND FEDERAL GOVERNMENT THROUGH POLITICAL POWER. I CONTINUE TO BE HARASSED AND ATTACKED THRU THE N.J. DEPT OF LABOR WHERE PERJURY HAS BEEN COMMITTED, RECORDS DESTROYED AND TAPES OF SWORN TESTIMONY ALTERED FOR THE BENEFIT OF THE CONSPIRING PARTIES. I HAVE BEEN DENIED THE RIGHT TO FILE CRIMINAL AND CIVIL COMPLAINTS IN ANY JURISDICTION. THERE HAS BEEN NO INVESTIGATION OF THE CRIMINAL OBSTRUCTION OF MY RIGHTS UNDER THE CONSTITUTION, N.J.S.A. TITLE 18A, THE N.J. LAW AGAINST DISCRIMINATION. OR THE A.D.A. APPARANTLY CRIME PAYS IN N.J. AND PAYS WELL.

THERE IS ONE INCIDENT WHERE I CAN DOCUMENT THAT MRS. NORTON APPARENTLY INFLUENCED THE ATTORNEY KATHLEEN SHEEDY, 225 BROAD STREET, RED BANK, NEW JERSEY. TO CANCEL A APPOINTMENT WITH HER REGARDING REPRESENTING ME IN THIS DISPUTE. I HAD ASKED MRS. NORTON IF SHE KNEW ANYTHING ABOUT THIS ATTORNEY, AND CIRCUMSTANCES IMPLY THAT SHE CANCELLED A APPOINTMENT WITH ME FOR 2:00 PM BECAUSE SHE HAD BEEN SUDDENLY CALLED IN TO FEDERAL COURT. (MRS. GENEVIEVE HAWLEY MAY HAVE BEEN PART OF THIS).

THERE IS A SECOND INCIDENT THAT INVOLVES MRS. NORTON'S ASSOCIATE MR. CAVANAGH WHO ALSO REPRESENTED ME. ALTHOUGH I CANNOT CURRENTLY FIX THE DATE I HAD A SECOND EXPERIENCE WHERE I HAD CONSULTED THE ATTORNEY PATRICK HEALY, 169 HIGHWAY 36 IN BELFORD N.J. IN THIS UNUSUAL EVENT I HAD CALLED THE PARISH PRIEST AT ST. MARY'S BECAUSE I DESPERATELY NEEDED SOMEONE TO TALK TO. I DO NOT RECALL HIS NAME. WHEN I SPOKE TO HIM LATER IN THE DAY HE REFERRED ME TO MR. HEALY STATING THAT HE HAD RECENTLY SPOKEN TO THIS ATTORNEY AND THAT HE SEEMED TO BE A GOOD MAN. HE GAVE ME HIS BOSINESS CARD, THE ONLY CARD ON HIS DESK. WHEN I CALLED THIS ATTORNEY I TOLD HIM THE COMPLETE STORY THAT I COULD RELATE AT THAT TIME, INCLUDING THAT I HAD A N.J.E.A. PAID ATTORNEY WHO DID NOT SEEM TO BE ACTING TO PROTECT MY RIGHTS. I DID NOT TELL HIM THAT IT WAS MR. CAVANAGH. I ARRANGED A APPOINTMENT AND SPENT ABOUT 1½ HOURS CONSULTING WITH THIS ATTORNEY. THERE WERE UNUSUAL EVENTS DURING THIS CONSULTATION, A MR. CAVANAGH CALLED THREE TIMES DURING THAT 1½ HOURS AND MR. HEALY BECAME EXTREMELY UPSET WHEN I ROSE FROM THE SEAT IN FRONT OF HIS DESK TO POINT TO DOCUMENTS OR ASK WHAT DOCUMENT HE WAS REFERING TO IN THE BINDER THAT I HAD GIVEN HIM. I BELIEVE THAT TWO CIRCUMSTANCES EXISTED; THAT PRIOR NOTICE WAS GIVEN TO THE PRIEST TO GIVE ME MR. HEALY'S CARD, WHICH WOULD INDICATE WHAT THE TELEPHONE COMPANY HAS CONFIRMED. " THAT IF THIS IS A PROBLEM WITH

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CORRUPTION IN THE STATE OF NEW JERSEY THAT I CAN EXPECT THAT MY PHONE IS TAPPED; AND THE SECOND INDICATION IS THAT MR. CAVANAGH WAS LISTENING TO THE CONVERSATION BETWEEN MR HEALY AND I ON A SPEAKER PHONE. THAT WAS WHY HE HAD BECOME SO UPSET WHEN I ROSE OUT OF MY SEAT, I COULD POSSIBLY SEE THAT THE SPEAKER PHONE WAS ON. DURING THAT CONSULTATION MR. HEALY HAD STATED THAT HE HAD BEEN A N.J.E.A. PAID ATTORNEY HIMSELF FOR A NUMBER OF YEARS BUT HIS PRACTICE WAS PRINCIPALLY IN REAL ESTATE. NOTABLY MR. CAVANAGH DIVIDES HIS PRACTICE BETWEEN REAL ESTATE AND SCHOOL LAW FOR THE N.J.E.A., MR HEALY ALSO HAD SIGNS IN HIS OFFICE INDICATING THAT HE WAS A LOCAL POLITICIAN RUNNING FOR OFFICE ON THE DEMOCRATIC TICKET AT THAT TIME.

AS A THIRD OCCURANCE: BY JULY OF 1993 I WAS OFFERING MORE AND MORE INFORMATION TO MRS. NORTON, AND ALL OF IT WAS BEING IGNORED. I CONTINUED TO SEEK LEGAL REPRESENTATION AND TO WIDEN MY SEARCH I PLACED A ADVERTISEMENT IN THE CLASSIFIED SECTION OF THE NEW YORK LAW JOURNAL. I MENTIONED THIS TO RALPH VENTOLA WHO HAD GAINED SENIORITY FROM THE ORIGINAL CONSPIRACY DATING TO 1984. I HAD ONLY 2 REPLIES, I WAS ABLE TO CONTACT A ATTORNEY JAMES THOMAS MURPHY, 103 SOUTH TYSON AVENUE FLORAL PARK, NEW YORK, 11001 (516) 775-7008. I EASILY ARRANGED TO MEET HIM IN THE FEDERAL COURTHOUSE IN NEWARK. THE DISCUSSION OF MY ACTION AGAINST THE BOARD OF EDUCATION WAS INTERESTING IN THAT IT WAS HIS POSITION THAT I SHOULD ACCEPT WHATEVER ACCOMMODATION THE SCHOOL BOARD OFFERED, THE SAME POSITION AS MR. HEALY IN BELFORD. AND LIKE MR HEALY HE WAS MORE INTERESTED IN HOW I HAD OBTAINED INFORMATION, AND HOW MUCH I UNDERSTOOD THAN HE WAS IN HELPING ME RESOLVE THE PROBLEM. I BELIEVE THAT A INVESTIGATION WILL REVEAL THAT THIS ATTORNEY HAS A PRIOR RELATIONSHIP WITH ONE OF THE PARTIES INVOLVED IN OBSTRUCTING MY RIGHTS

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THE FOLLOWING DOCUMENTS ARE EXPLAINED OR REFERENCED HERE (PAGES G-1 THRU G-73

G-1,2. LETTER OF MAY 28 1993 TO SENATOR KYRILLOS WHICH IS SELF EXPLANATORY, INDICATIVE OF MY UNDERSTANDING OF THE SITUATION AT THAT TIME

G-3 THRU G-10. LETTER OF MAY 24, 1993 TO MRS NORTON (ACCOMPANYING DOCUMENTS ARE NOT ATTACHED), AS I RECALL I ALSO SENT A COPY TO SENATOR KYRILLOS WITH THE MAY 28, 1993 LETTER SENT TO HIM. IT AGAIN DOCUMENTS THAT I HAD A LIMITED UNDERSTANDING OF THE ACTIONS AND ISSUES OF THE CONSPIRING PARTIES. MRS. NORTON REFUSED TO DISCUSS THIS LETTER OR ANY OF THE DOCUMENTS I HAD SENT HER AT ANY TIME.

G-11 RESPONSE FROM SENATOR KYRILLOS, JUNE 14, 1993

G-12 RESPONSE FROM SENATOR KYRILLOS, AUGUST. 23, 1993 WHILE I WAS WAITING FOR THIS LETTER THE BOARD OF ED.'S PERSONNEL DIRECTOR LORENE MOORE RESIGNED, THE COUNTY UNISERV REPRESENTATIVE RESIGNED, AND THE SUPERINTENDENT DR JOSEPH KREISKEY RESIGNED; ALL OF THESE INDIVIDUALS WERE INVOLVED IN OBSTRUCTING MY RIGHTS. DR JOSEPH KREISKEY WAS LEFT IN HIS POSITION UNTIL DEC. OF 1994 AND THEN RETIRED ESCAPING RESPONSIBILITY FOR HIS ACTIONS. CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS BECAME AND CONTINUES TO BE A CIVIL OFFENSE.

G-13 HERE IS NOTICE OF A RIGHT TO SUE LETTER. MRS. NORTON HAD ARRANGED THRU POLITICAL CORRUPT INFLUENCE TO HAVE IT DELAYED. WHILE I WAS REGULARLY BEING HARASSED IN MY TEACHING POSITION. THIS LETTER SHOULD HAVE ARRIVED IN AUGUST OF 1992 MRS. NORTON STATING THAT IT WOULD BE IN TIME TO FILE BEFORE THE START OF THE SCHOOL YEAR. 1993-1994. MRS. NORTON HAD AGAIN ASSISTED THE CONSPIRING PARTIES BY ASSURING THAT NO RETALIATION CLAIM COULD BE MADE IN THE CIRCUMSTANCE THAT SHE ASSISTED THE BOARD OF EDUCATION IN ATTEMPTING TO COERCE ME TO ACCEPT A PART-TIME SCHEDULE BY SUSPENDING ME WITHOUT PAY OR DUE PROCESS. MRS. NORTON WAS ALSO

AWARE THAT THE N.J. DIVISION ON CIVIL RIGHTS HAD "INVESTIGATED" THE COMPLAINT I HAD FILED IN FEBRUARY OF 1993. I WAS NOT ALLOWED TO PARTICIPATE IN THAT INVESTIGATION OR SUPPLY ANY DOCUMENTS, OR REFUTE WHAT I NOW KNOW WHAT WERE FRAUDULENT RESPONSES TO THE QUESTIONS THE DCR HAD ASKED. MRS NORTON HAD AGAIN ASSURED THAT THEIR WAS NO DOCUMENTATION OF THE ACTUAL FACTS OF THE DISPUTE, CONSTITUTIONAL VIOLATIONS OR RETALIATION. IN EFFECT MRS. NORTON HAD ASSURED THAT ALL CONSPIRING PARTIES WERE PRITECTED AND HER ACTIONS CONCEALED.

G-14 MRS. NORTON HAD THROUGH CORRUPT POLITICAL INFLUENCE HAD ARRANGED TO HAVE THE "RIGHT TO SUE" LETTER DELAYED UNTIL JANUARY 13, 1994 BY POLITICAL CORRUPT INFLUENCE, HAD OBTAINED PERMISSION TO SUE WHEN ONLY THE JUSTICE DEPARTMENT CAN SUE A MUNICIPAL/LOCAL GOVERNMENT (SEE BOOKLET COPY, PAGE, G-15) "SPECIFICALLY REQUESTED" THE RIGHT TO SUE TO CONCEAL THE ACTIONS OF THE CONSPIRING PARTIES, AND HAD THE "RIGHT TO SUE" LETTER SENT TO HER WHEN IT SHOULD HAVE COME TO ME. SHE REFUSED TO ALLOW ME TO SEE OR OBTAIN A COPY OF THAT LETTER UNTIL DELIVERING MY FILE TO ME IN AUG. '94.

IN APRIL OF 1994 SHE HAD ABANDONED REPRESENTATION AS I HAD EXPECTED HAVING ASSURED THAT I WOULD NOT BE FINANCIALLY ABLE TO OBTAIN REPRESENTATION AGAINST THE MULTIPLE CONSPIRING PARTIES IN CIVIL ACTIONS. AS I HAD EXPECTED SHE CLAIMED A CONFLICT OF INTEREST REGARDING THE CONSPIRING PARTIES REVEALING THE CONFLICT OF INTEREST THAT HAD EXISTED SINCE JANUARY OF 1993 WHEN SHE HAD TAKEN POSSESSION OF MY RIGHTS, AND SOLD THEM FOR POLITICAL PROFIT.

G-15 FROM THE U.S. GOVERNMENT PAMPHLET "E.E.O.C. INFORMATION FOR THE PRIVATE SECTOR AND STATE AND LOCAL GOVERNMENTS" I HAVE UNDERLINED THE SIGNIFICANT SENTENCE. MRS. NORTON, AS PREVIOUSLY STATED HAD USED IMPROPER INFLUENCE TO OBTAIN A "RIGHT TO SUE" LETTER SO SHE COULD ASSURE THAT NO

INVESTIGATION WOULD BE MADE AND THAT SHE COULD CONCEAL THE ACTIONS OF THE CONSPIRING PARTIES INCLUDING HER OWN.

G-16 THRU G-51 HERE IS MRS. NORTON'S NARRATION OF EVENTS WHERE SHE DEFENDS HER ACTIONS BEFORE JUDGE DEBEVOISE. IT MIXES SMALL ELEMENTS OF TRUTH WITH COMPLETELY FALSE STATEMENTS, CONTENDS THAT SHE DIDN'T KNOW ANYTHING ABOUT THE CONFLICT OF INTEREST THAT HAD EXISTED THROUGHOUT AND HAD ACTED CORRECTLY IN IGNORING CONSTITUTIONAL VIOLATIONS, MY RIGHTS AS A TENURED TEACHER AND THAT A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS WAS, AND IS, AN ONGOING MATTER.

1. ON MARCH 17, 1994 MRS. NORTON HAD STATED TO ME THAT IF "I TURNED ON HER SHE COULD BE IMPLICATED IN CONSPIRACY TO OBSTRUCT AND RACKATEERING" IN RESPONSE TO MY STATEMENT THAT I HAD NO PROTECTION FROM THE PARTIES INVOLVED AND WOULD HAVE TO PURSUE CRIMINAL CHARGES TO PROTECT MYSELF. I HAD IN FACT COMMUNICATED WHAT THE CORRECT CIRCUMSTANCES WERE, THAT MRS. NORTON AND MR. CAVANAGH HAD IGNORED ALL OF MY IMPUT, DOCUMENTS AND EVIDENCE OF CRIMINAL CONSPIRACY. I DISASSOCIATED MYSELF WITH A ATTORNEY WHO HAD ADMITTED HER PARTICIPATION IN CRIMINAL ACTIVITY.
2. MRS. NORTON'S HISTORY, FAILING TO INCLUDE ALL OF THE LETTERS, DOCUMENTS AND MATERIALS THAT DOCUMENTED CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS.
3. I WAS REFERRED (SET UP) TO BE SENT TO THEIR OFFICE SO THAT I WOULD NOT ESCAPE THE N.J.E.A AND THEIR INTEREST IN THE PURCHASE OF POLITICAL POWER WITH MY RIGHTS.
4. SUSPENDED WITHOUT PAY OR DUE PROCESS IS NOW "UNEMPLOYED". NEITHER MRS. NORTON OR MR. CAVANAGH HAD MADE ANY EFFORT TO ENTER THE FACT THAT MY CONSTITUTIONAL RIGHTS HAD BEEN VIOLATED.
5. MRS. NORTON KNEW THAT A FRAUDULENT SENIORITY LIST WAS USED TO JUSTIFY THEIR ACTIONS, THAT THE SCHEDULE OFFERED TO ME WAS A FRAUD, AND THAT MY PAY WAS BEING ILLEGALLY WITHELD. I RECEIVED UNEMPLOYMENT

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BENEFITS ONLY AFTER I HAD CONTACTED SENATOR KYRILLOS (LETTERS ARE G-1 THRU G-10)

6. I HAD REQUESTED PROTECTION FROM ALL OF THE INVOLVED PARTIES CONSPIRING TO OBSTRUCT MY RIGHTS, ISSUES THAT WERE ACTIVELY IGNORED. DESCRIBED AS THE "MYTHICAL HYDRA".

7. THE SOSPENSION WITHOUT PAY OR DUE PROCESS CONTINUED UNTIL OCT. 15, 1993 WITH MRS. NORTON'S COOPERATION AND APPROVAL. I WAS RETURNED TO A HOSTILE WORK SITUATION, ACCOMMODATION WAS MADE AND HARASSMENT CONTINUED THROUGH THE BOARD OF EDUCATION, E.T.E.A, AND UNEMPLOYMENT HEARINGS. ADDITIONAL PROBLEMS THAT OCCURRED WAS HARASSMENT THRU MY MEDICAL CARE. AND AS PREVIOUSLY STATED MRS NORTON IGNORED THE FACT THAT I HAD PRESENTED DOCUMENTATION THAT THE PROBLEMS WITH DISCRIMINATION DATED BACK TO THE TIME THAT THE FRAUDULENT SENIORITY LIST WAS USED TO ATTEMPT TO GET RID OF ME AS A EMPLOYEE AND INSURANCE RISK MRS. NORTON HAD THE RIGHT TO SUE LETTER DELAYED SO THAT THE BOARD COULD ATTEMPT TO FORCE ME OUT OF MY TENURED POSITION BY HARASSMENT, OR MANUFACTURING EVIDENCE OF INCOMPETENCE OR INCAPACITY.

8. THE UNEMPLOYMENT ISSUE REMAINS UNSETTLED; IT IS A REGULAR SOURCE OF HARASSMENT IN A SITUATION WHERE PARTIES IN THE UNEMPLOYMENT OFFICE HAVE ENGAGED IN CRIMINAL ACTIVITY AND ALTERED SWORN TESTIMONY.

9. I HAD REGULARLY EXPRESSED MY CONCERN AND REQUESTED TO END N.J.E.A. PAYMENT FOR MY REPRESENTATION, EXPRESSED CONCERN ABOUT THE DELAY, CHALLENGED MRS. NORTON ON HER COERCING ME TO DROP THE FACT FINDING HEARING OF MAY 6, 1993 AT THE D.C.R. I HAD RAISED EVERY ISSUE, OFFERED AND PROVIDED DOCUMENTS, AND EXPLAINED THE INTERESTS OF THE E.T.E.A., BOARD OF EDUCATION AND THE INSURANCE COMPANIES INVOLVED, THE DENIAL OF MY RIGHT TO FILE THE COMPLETE CHARGES AT THE E.E.O.C. OR D.C.R.. MRS NORTON AND MR CAVANAGH HAD FOCUSED



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THEIR "CAUSE OF ACTION" AT CAUSING DELAY AND DAMAGING ME FINANCIALLY, CONCEALING A CRIMINAL CONSPIRACY DATING TO 1984. AND OBSTRUCTING MY RIGHTS AS A TENURED TEACHER.

CIRCUMSTANCES ALSO IMPLY THAT MRS. NORTON AND MR. CAVANAGH KNEW MY PHONE WAS TAPPED; I HAD REPEATEDLY GIVEN THEM DOCUMENTS RELATING TO THE BOARD'S ACTIONS, THE E.T.E.A.'s AND ADDITIONAL INVOLVED PARTIES. THEY WOULD NOT DISCUSS THEM BY PHONE, LIMITED MY INPUT TO MEETINGS IN THEIR OFFICES AND EVEN THEN MRS. NORTON WOULD ALLOW ME TO PRESENT WHAT I HAD DOCUMENTED OR DISCOVERED BUT WOULD NOT DISCUSS THEM. I ALSO BELIEVE THAT THESE MEETINGS WERE RECORDED SO THAT MRS. NORTON COULD DEFEND HER ACTIONS; YOU MAY EXPECT THAT THE TAPES WILL HAVE BEEN ALTERED BY COMPUTER. I HAD ALREADY DETECTED THE LOW-TECH EDITING OF THE TAPES OF UNEMPLOYMENT HEARINGS OF DEC. 4. 1992. IN JANUARY OF 1994 I ALSO ADDRESSED THE ISSUE OF DIGITAL ALTERATION OF TAPES HAVING HAD PHONE CONVERSATIONS WHERE THE OTHER PARTY HAD MADE SPECIFIC EFFORTS TO ELICIT SPECIFIC WORDS OR PHRASES THAT FACILITATE COMPUTER ALTERATION.

HERE MRS. NORTON ATTEMPTS TO SLANDER ME BEFORE A FEDERAL COURT JUDGE BY INNUENDO. MRS. NORTON WAS SHOCKED AND FRIGHTENED" BECAUSE SHE HAD STATED THAT IF I TURNED ON HER (PURSUED CRIMINAL CHARGES) SHE COULD BE IMPLICATED IN CONSPIRACY TO OBSTRUCT AND RACKATEERING. I HAD SAT IN A CHAIR OPPOSITE HER DESK AND ASSERTED MY RIGHTS STATING THAT AFTER 2 YEARS THE BOARD OF EDUCATION, E.T.E.A. AND N.J.E.A. HAD ME EXACTLY WHERE THEY WANTED ME, THAT I WAS OUT A YEARS PAY, MY SALARY AND SENIORITY HAD BEEN REDUCED AND I HAD NO PROTECTION FROM ANY OF THE PARTIES INVOLVED MRS. NORTON HAD TOLD ME TO STAY IN MY SEAT IN HER OFFICE, WENT AND FOUND

MR CAVANAGH. AND RETURNED. MR. CAVANAGH THEN TOOK OVER; HE INSULTED ME FOR USING THE WORD "HONESTLY" OR HONEST; CHALLENGED ME TO EXPRESS MY OPINION ON WHETHER MRS. NORTON AND HE WERE CORRUPT; TOLD ME THAT IF I DID NOT LIKE THE COURSE OF ACTION THEY HAD CHOSEN I COULD GO TO LAW SCHOOL AND SUE THE PARTIES INVOLVED MYSELF; STATED THAT THEY WOULD FIND ME A ATTORNEY TO PURSUE THEIR ACTION IN FEDERAL COURT OR AS A ALTERNATIVE, THAT I COULD APPEAR IN FEDERAL COURT "PRO SE" DESPITE MY BEING DISABLED. IT WAS ONLY AFTER MR. CAVANAGH'S ½ HOUR VERBAL ASSAULT THAT I WAS ALLOWED TO LEAVE. I WAS SUPPOSED TO RE-WRITE THEIR FEDERAL ACTION ON MY OWN, INCLUDE THE DOCUMENTATION OF THE ACTIONS OF THE CONSPIRING PARTIES DATING TO 1984 WITHOUT ANY ASSISTANCE AND DEAL WITH THE RESPONSIBILITIES OF MY TEACHING POSITION. I LATER RETURNED THE FEDERAL ACTION THAT IGNORED EXTENSIVE CRIMINAL ACTIVITY TO MRS. NORTON HAVING MADE MINIMAL CORRECTIONS. I FOUND THAT I WAS TRYING TO FIT THE HISTORY OF 10 YEARS OF DISCRIMINATION AND CONSPIRACY IN TO THE FAIRY TALE THEY HAD CONCOCTED TO SUPPORT THE CONSPIRING PARTIES BY GIVING THE BOARD OF EDUCATION THE ADVANTAGE OF A DEFENSIBLE POSITION, THAT I HAD SIMPLY REFUSED THE ACCOMMODATION THEY HAD OFFERED; ONE THAT WAS A FRAUD, VIOLATED MY RIGHTS AND NO MENTION WAS MADE THAT THERE HAD BEEN EXTENSIVE EFFORTS TO COERCE ME TO END MY EMPLOYMENT AND DAMAGE ME FINANCIALLY OVER A TEN YEAR PERIOD.

I CALLED MR. CAVANAGH WHO REFUSED TO DISCUSS THE COMPLAINT.

THE COMPLETION OF THIS LETTER IS IN THE SAME VEIN; MRS. NORTON CONTINUES TO ATTEMPT TO DEFEND HER ACTIONS, DENIES KNOWLEDGE OF A CRIMINAL CONSPIRACY, PRODUCES MORE "LEGAL WORK" THAN SHE HAD IN THE PRIOR 1½ YEARS TO PROTECT MY RIGHTS



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IN ANY OF THE REASONED AND TIMELY JURISDICTIONS. SHE AND THE PARTIES INVOLVED HAD ACTED TO ASSURE THAT NO SWORN TESTIMONY OR WRITTEN RECORD OF THE PREVIOUS 16 YEARS OF ACTIONS WAS ENTERED IN ANY JURISDICTION. IN THE DISCUSSION OF THIS MATTER WITH MRS. NORTON ON FEB. 9, 1994. I HAD PLEADED WITH MRS. NORTON TO SUE FOR AS MUCH MONEY AS POSSIBLE, THAT NOTHING WOULD PROTECT ME FROM THEIR ACTIONS AND THOSE OF THE PARTIES INVOLVED MRS. NORTON RELUCTANTLY AGREED TO SETTLE FOR $100,000^{00}$ DOLLARS, AN AMOUNT THAT WOULD BE ROUGHLY EQUAL TO MY BACK PAY, INTEREST AND EXPENSES. IT WAS MRS. NORTON'S POSITION THAT I WOULD HAVE TO PAY BACK WASHINGTON NATIONAL AND UNEMPLOYMENT OUT OF THAT AMOUNT.

MRS. NORTON, AS STATED ABOVE THAT SHE WOULD RECOVER MY BACK PAY AND SETTLE FOR $100,000^{00}$, INCLUDING MY SALARY. THE LAWSUIT THAT SHE HAD FILED WAS FOR $2,000,000^{00}$ A FIGURE WE HAD NEVER DISCUSSED, AND FROM EVALUATING OTHER LAWSUITS IT APPEARS TO BE FAR TOO LITTLE FOR 10 YEARS OF MY LIFE. THAT AMOUNT WOULD ACTUALLY NOT COVER THE AMOUNT THEY HAD ATTEMPTED TO DEBIT ME BY FRAUD; A 1 MILLION DOLLAR HEALTH INSURANCE POLICY AND MY INCOME TO THE MANDATORY RETIREMENT AGE OF 70, APPROXIMATELY $1.7 MILLION DOLLARS WITHOUT ANY RAISES OR INTEREST. MRS. NORTON'S POSITION THROUGHOUT IS THAT I SHOULD WAIT AND ALLOW DAMAGE TO ACCUMULATE, AND THAT SHE WOULD INCLUDE ALL OF THE PARTIES AND ACTIONS IN THE FEDERAL ACTIONS. THE LAWSUIT SHE FILED WAS A SHAM TO PROTECT THE CONSPIRING PARTIES AND TO ASSURE THAT THE DAMAGES WOULD BE LIMITED IF THERE WERE ANY. I ANTICIPATED THAT SHE WOULD ABANDON REPRESENTATION, I HAD SPOKEN TO OTHER PARTIES WHO HAD N.J. EA. REPRESENTATION; IN EVERY INSTANCE THEY WERE ABANDONED, I HAD DISCUSSED WITH MRS. NORTON THAT IN ALL MY READING OF THE LAW THAT I HAD NEVER SEEN THE N.J.E.A MENTIONED AS PLAINTIFF IN ANY LEGAL ACTION, AND HAD BEEN ADVISED THAT I HAD THE GROUNDS FOR A SUBSTANTIAL LAWSUIT AGAINST THE N.J. EA. FOR FAILING TO REPRESENT ME. I HAD TRIED



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TO ESCAPE N.J. E.A. REPRESENTATION AND FOUND THAT I COULD NOT.

13. I HAD ALSO ADDRESSED THIS ISSUE WITH BOTH MRS. NORTON + MR. CAVANAGH PRESENT ON MARCH 17, 1994, STATING THAT ACTION SHOULD HAVE BEEN TAKEN BEFORE THE E.E.O.C AS AGENCY PROCEDURE, THE D.C.R, THE PUBLIC EMPLOYEE'S RELATIONS COMMITTEE, IN SUPERIOR COURT THROUGH INJUNCTIVE RELIEF. THEIR ACTIONS AND INTENT WERE TO RAILROAD ME IN TO FEDERAL COURT AND ABANDON REPRESENTATION. AND EXPECT THAT I WOULD APPEAR "PRO SE", THEY WERE USING THE LAW, AND MY DISABILITY TO ASSURE THAT I WOULD NOT VIOLATE THE DEAL THAT WAS MADE IN JANUARY OF 1993. THEY WOULD CONCEAL CRIME FOR MIDDLESEX COUNTY AND ASSURE THAT CONGRESSMAN PALLONE FROM MONMOUTH COUNTY HAD THE DEMOCRATIC SUPPORT OF BOTH COUNTIES IN THE 1994 PRIMARY AND ELECTION.

14. IN 1½ YEARS MRS. NORTON HAD DONE NOTHING TO RESOLVE ANY PROBLEM IN ANY JURISDICTION, SHE ACTED AGAINST A CRIMINAL CONSPIRACY BY IGNORING IT AND ASSISTING IT. WHAT MRS. NORTON HAS STATED IN THIS LETTER IS A PURPOSEFUL EFFORT; WHAT A ATTORNEY HAD GENERALLY DESCRIBED AS A "COVER YOUR ASS LETTER", AND ONE THAT SHOULD STAND AGAINST THE COMPARISON WITH HER ACTIONS; SHE HAD ASSURED THAT I WOULD BE DAMAGED TO PROTECT HERSELF AND OTHERS, AND DID IT FOR POLITICAL PROFIT.

MRS. NORTON HAD WITHELD THE RIGHT TO SUE NOTICE AND ALL OF THE MATERIAL IN MY FILE UNTIL AUGUST OF 1995, 4 MONTHS AFTER SHE HAD ABANDONED REPRESENTATION. I CONTACTED MR. DONALD TARR, N.J.E.A UNISERV REPRESENTATIVE FOR MIDDLESEX COUNTY REGARDING THE COMPLETE VIOLATION OF MY RIGHTS BY N.J.E.A. ATTORNEYS. WHO STATED THAT HE WOULD NOT APPROVE THE N.J.E.A. SUPPLYING ANY FURTHER LEGAL REPRESENTATION HIS POSITION WAS THAT N.J.E.A. ATTORNEYS COULD NOT BE CORRUPT; HE WAS AND IS INCORRECT.

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G-21 THRU G-51 THESE ARE THE EXHIBITS MRS. NORTON SUPPLIED TO JUDGE DEVOISE IN HER LENGTHY EFFORT TO DEFEND HER ACTIONS. HER DOCUMENTATION BEGINS WITH MARCH 30, 1994; SHE NEGLECTED TO INCLUDE ANY OF THE DOCUMENTATION THAT I HAD GIVEN HER PRIOR TO THAT TIME ON THE FRAUDULENT SENIORITY LIST, THE ACTIONS OF MIDDLETOWN PHARMACY, WASHINGTON NATIONAL INSURANCE COMPANY, THE VALIC ANNUITY COMPANY, OR ANY OF THE FRAUDS, RETALIATION, OR OTHER ACTIONS OF THE CONSPIRING PARTIES.

G 52, G 53 HERE IS A LETTER FROM THE ATTORNEY GENERAL'S OFFICE CLAIMING THAT THEY HAVE NO JURISDICTION OVER CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS, AND DISPLAYING WHAT I HAVE COME TO DESCRIBE AS THEIR ABILITY TO BE "STUDIOUSLY IGNORANT". IT'S CLAIMING THAT I HAD BEEN ABLE TO FILE COMPLAINTS IN ANY OF THE JURISDICTIONS STATED, WHEN NONE OF THE ISSUES HAD BEEN SETTLED, AND HAVE NEVER BEEN SETTLED. POLITICALLY SUPPORTED CRIME HAS STRONG SUPPORT IN NEW JERSEY.

G-54 G55 HERE ARE TWO ASBURY PARK NEWS ARTICLES THAT SUPPORT MY ALLEGATION THAT MY RIGHTS WERE OBSTRUCTED TO ASSURE THAT THE PARTIES INVOLVED WOULD BE PROTECTED AND POLITICAL SUPPORT FOR CONGRESSMAN PALLONE WOULD COME FROM BOTH COUNTIES IN THE 1994 ELECTIONS.

G56, G57 HERE IS THE LATEST AND ONLY ACTION PENDING IN ANY JURISDICTION THAT I HAVE LEFT TO PURSUE. I CANNOT FIND A ATTORNEY WHO WILL REPRESENT ME IN ANY JURISDICTION AGAINST MULTIPLE PARTIES INVOLVED IN THE CRIME OF CONSPIRACY. I HAVE NO IDEA WHETHER ANY OF THE ISSUES WILL BE PROPERLY ADDRESSED. AS MY DOCUMENTATION STATES I HAVE BEEN A VICTIM OF DISCRIMINATION AND CRIMES COMMITTED TO CARRY OUT DISCRIMINATION IN THE STATE OF NEW JERSEY WHERE POLITICS AND CRIME PREVAIL, NOT ETHICS OR THE LAW. THE HEARING SCHEDULED FOR MARCH 3, 1995 HAS NOW BEEN POSTPONED UNTIL "SOMETIME IN APRIL, AGAIN THE BOARD HAS THE OPPORTUNITY TO RETALIATE.

SLN-14

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G-58 THRU G-73. HERE IS THE FEDERAL ACTION MRS. NORTON FILED DESPITE MY STATING IN A NOTE TO HER THAT I WOULD NOT BE PARTY TO COVERING UP WHAT HAD BEEN DONE. APPARENTLY MRS. NORTON HAD THE ADVANTAGE HERE OF NOT NEEDING TO FRAUDULENTLY PUT MY SIGNATURE ON HER FEDERAL FILING. PREVIOUSLY MR. KLAUSNER HAD FRAUDULENTLY ATTACHED MY SIGNATURE TO THE SUPERIOR COURT ACTION HE FILED IN FEBRUARY OF 1993, APPARENTLY HE DID THAT TO VACATE THE DIV. ON CIVIL RIGHTS COMPLAINT THAT I HAD FILED IN FEBRUARY OF 1993. MRS. NORTON HAD ALSO REFUSED TO DISCUSS THAT ISSUE AND HAD FORCED ME TO DROP THE FACT-FINDING AND D.C.R. COMPLAINT. THERE HAS BEEN CONSISTENT EFFORTS TO ASSURE THAT I DON'T EVER RECOVER FROM THEIR ACTIONS.

I HOPE THAT I HAVE SUPPLIED SUFFICIENT DOCUMENTATION TO ASSURE THAT A INVESTIGATION OF MRS. NORTON'S ETHICS AS A ATTORNEY TO BEGIN. I HAVE MANY MORE LETTERS AND DOCUMENTS ALL OF WHICH ADDRESS THE SAME ISSUE, MRS. NORTON KNEW THAT HER CHOSEN COURSE OF ACTION WAS NOT IN MY INTEREST. IT CONFIRMS WHAT I HAVE OFTEN SAID, PEOPLE ARE NOT WHAT THEY SAY, THEY ARE WHAT THEY DO.

CONFIDENTIALITY MEANS NOTHING TO PEOPLE INVOLVED IN CRIMINAL ACTIVITY. IT HAS BEEN MY EXPERIENCE THROUGHOUT THIS DISPUTE THAT RETALIATION FOLLOWS FROM ONE OF THE CONSPIRING PARTIES IN RESPONSE TO MY FILING ANY COMPLAINT AND I EXPECT THAT IT WILL CONTINUE TO BE TRUE. REGRETABLY I HAVE NO ATTORNEY OR MEANS OF PROTECTING MY SELF FROM ANY OF THEIR ACTIONS. A HANDICAPPED PERSON CAN'T BE PROTECTED FROM CONSPIRACY BECAUSE YOU CAN'T REPORT CONSPIRACY, APPARENTLY IT IS TOO SERIOUS A CRIME TO REPORT, BUT NOT TO COMMIT.

ON THE ACTIONS OF THE ATTORNEY THOMAS CAVANAGH

THIS MATERIAL IS A PORTION OF A FILING IN ANOTHER JURISDICTION. I HAVE INCLUDED IT HERE TO DESCRIBE THE SITUATION THAT EXISTED FROM FEBRUARY OF 1993 THROUGH APRIL OF 1994. THE INTEREST OF MR. CAVANAGH AND HIS ASSOCIATE SHARON LYNCH NORTON WAS TO ASSURE THAT I WOULD NOT REVEAL A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS WHERE THEY WERE WILLING TO PARTICIPATE IN THAT CONSPIRACY AS PART OF A CORRUPT POLITICAL BARGAIN. IN RETURN FOR THEIR ACTIONS IN OBSTRUCTING MY RIGHTS CONGRESSMAN PALLONE RAN AS THE DEMOCRATIC CANDIDATE IN THE SIXTH CONGRESSIONAL DISTRICT UNOPPOSED BY ANY CANDIDATE FROM MIDDLESEX COUNTY IN THE PRIMARY. ANY REASONED INVESTIGATION WILL MAKE THE SAME CONCLUSION THAT I DID EVENTUALLY, THAT THIS POLITICAL DEAL HAS HAD THE SUPPORT OF THESE ATTORNEYS IN RETURN FOR POLITICAL AND FINANCIAL PROFIT.

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MR. CAVANAGH ENGAGED IN A CONSPIRACY TO OBSTRUCT MY RIGHTS WITH THE INDIVIDUALS AND ENTITIES NAMED IN THE ACCOMPANYING DOCUMENTS AND AFFADAVITS. HIS INTEREST IN THIS MATTER WAS TO ACT ON THE BEHALF OF THE PARTIES PARTICIPATING IN A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS UNDER THE CONSTITUTION, TO DUE-PROCESS, PRIVACY AND EQUAL PROTECTION, AND BY THEIR ACTIONS OBSTRUCT MY RIGHTS UNDER THE A.D.A, N.J. L.A.D., AND TITLE 18A "SCHOOL LAW" WITH THE SPECIFIC INTENT OF ASSURING THAT I WOULD NOT BE ABLE TO CONTINUE TO ELECT MY MEDICAL BENEFITS AT GROUP COST OR OBTAIN A DISABILITY PENSION. WHEN MR. CAVANAGH AND MRS. NORTON TOOK OVER MY RIGHTS IN JANUARY OF 1993 THEY AGREED TO CONCEAL CRIMINAL ACTIVITY BY MULTIPLE CONSPIRING PARTIES.

TC 1

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WHEN I WAS REFERRED TO THE LAW FIRM CHAMLIN ROSEN CAVANAGH & ULIANO I DID NOT REALIZE THAT THE CONSPIRING PARTIES HAD PRODUCED A REFERRAL TO ANOTHER LAW FIRM WHO WOULD PROVIDE REPRESENTATION BY ATTORNEYS PAID AND CONTROLLED BY THE NEW JERSEY EDUCATION ASSOCIATION. AS STATED ELSEWHERE IN THE ACCOMPANYING DOCUMENTS THE FIRST ATTORNEY THAT I WAS ASSIGNED TO DID NOTHING BUT FIND CAUSE FOR DELAY, ADDED THE DEMAND THAT I OBTAIN COPIES OF MY MEDICAL RECORDS, AND A ADDITIONAL LETTER FROM MY DOCTOR. THIS ATTORNEY, STEPHEN KLAUSNER HAD STARTED A COURSE OF ACTION THAT MRS. NORTON AND MR. CAVANAGH CONTINUED, OBSTRUCTING MY RIGHTS AS A TENURED TEACHER, EXCUSING DELAY AND LEAVING NO DOCUMENTARY TRAIL OF THEIR ACTIONS BEHIND.

IN FEBRUARY OF 1993 WHEN MR. CAVANAGH AND MRS. NORTON TOOK OVER CONTROL OF MY RIGHTS THEY HAD TO CONCEAL:

- THE DUE PROCESS VIOLATIONS OF THE EDISON BOARD OF EDUCATION IN THEIR REDUCING ME FROM A TENURED TEACHER TO THE POSITION OF A SUBSTITUTE WITH THE CLAIM THAT I HAD NO PENSION OR SENIORITY RIGHTS.
- DUE PROCESS VIOLATIONS DOCUMENTED IN THE LETTER OF OCT. 15, 1992 WHEN I WAS SUSPENDED WITHOUT A HEARING.
- REMOVAL OF MY FUNDS FROM MY ANNUITY ACCOUNT WITH VALIC
- THAT VALIC HAD ATTEMPTED TO CONCEAL THE REMOVAL OF MY FUNDS, AND THAT MY HOME WAS BURGLARIZED IN A ATTEMPT TO RECOVER THE RECORD OF THAT FRAUDULENT WITHDRAWAL OF FUNDS.
- THAT WASHINGTON NATIONAL INSURANCE COMPANY ENDORSED BY THE N. J. E. A. HAD VIOLATED STATE LAW IN REFUSING TO PAY ME ON MY DISABILITY INSURANCE.
- THAT THE ORIGINAL CONSPIRING PARTIES HAD GONE TO THE NEW JERSEY DEPT. OF LABOR AND HAD MY UNEMPLOYMENT BENEFITS DENIED.



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- THAT THE SENIORITY LIST USED BY THE BOARD OF EDUCATION SINCE AT LEAST 1984 WAS A FRAUD WITH THE SPECIFIC INTENT OF ENDING MY EMPLOYMENT
- THAT THE BOARD OF EDUCATION HAD REMOVED SICK DAYS FROM MY ACCUMULATION (PENALTY UNDER STATE LAW; WITHDRAWAL OF STATE FUNDS)
- THAT FOR THE 91-92 SCHOOL YEAR THE BOARD OF EDUCATION HAD REDUCED MY PAY BY 20% WITHOUT DUE PROCESS THRU FRAUD AND COERCION.
- THAT IN INVESTIGATING MY DISPUTE WITH THE BOARD OF EDUCATION I EVENTUALLY FOUND THAT THE E.T.E.A. REGULARLY ACTED WITH THE BOARD TO DAMAGE OR ABROGATE THE RIGHTS OF A GROUP OF INDIVIDUALS WHO MIGHT INCUR MEDICAL COSTS CHARGABLE TO THE INSURANCE RISK GROUP. THIS GROUP INCLUDES PREGNANT WOMEN, DISABLED PEOPLE, PEOPLE OVER 55, AND PARTICULARLY PEOPLE WHO WERE TERMINALLY ILL.

I DID SOMETHING THAT THEY DID NOT EXPECT OF A INDUSTRIAL ARTS TEACHER WHO HAS A DISABILITY THAT LIMITS MY ABILITY TO READ AND WRITE FOR LONG PERIODS. I WENT AND INVESTIGATED, READ THE LAW, PRODUCED DOCUMENTS FROM MY OWN FILES AND CORRELATED THE ACTIONS OF THE CONSPIRING PARTIES BACK TO 1984, WHEN THE EDISON BOARD OF EDUCATION HAD BECAME SELF INSURED. I WAS DOCUMENTING CONSPIRACY TO OBSTRUCT MY RIGHTS, UNION RACKATEERING, INSURANCE FRAUD AND CONSTITUTIONAL VIOLATIONS DATING TO 1984. I HAD A INVERSE RELATIONSHIP WITH THE ATTORNEYS THRU 20 MONTHS; THE MORE I KNEW, THE LESS THEY TALKED TO ME, AND WHEN THEY REFUSED TO DISCUSS THE ISSUES AND DOCUMENTS I KNEW I HAD TO LOOK DEEPER INTO THAT ISSUE WITHOUT THEIR ADVICE OR ASSISTANCE

MR. KLAUSNER, MR. CAVANAGH AND MRS NORTON ALL HAD THE SAME INTEREST OF NARROWING THE SCOPE OF ANY LEGAL ACTION AND PROTECTING A CONSPIRACY DATING TO 1984, ONE THAT IN 1992 HAD A SPECIFIC INTEREST OF ENDING MY EMPLOYMENT



950437007/29

BEFORE I FOUND THE ACTUAL CAUSE OF THEIR ACTIONS.

TO ACHIEVE THIS INTENDED ACTION MRS. NORTON AND MR. CAVANAGH MALICIOUSLY MISUSED THE LEGAL PROCESS TO DAMAGE ME, COERCE ME IN TO CONCEALING THE ACTUAL CAUSE OF THE BOARD OF EDUCATION'S ADVERSE ACTIONS, AND TO CONCEAL THEIR PARTICIPATION IN OBSTRUCTING MY RIGHTS.

THE ACTIONS OF MR. CAVANAGH AS A N.J.E.A. PAID REFERRAL ATTORNEY ARE STATED THROUGHOUT THE ACCOMPANYING DOCUMENTS AND IN THE PAGES REGARDING THE ACTIONS OF SHARON LYNCH NORTON, ALSO PAID BY THE N.J. E.A. THEY PURSUED A COURSE OF ACTION THAT REPRESENTS THE POLITICAL AGENDA OF THE N.J.E.A., BUYING POLITICIANS.

AFTER MY ORIGINAL MEETING WITH MR. CAVANAGH AND MRS. NORTON ON FEBRUARY 2ND, 1993 I WAS PRINCIPALLY REPRESENTED BY MRS. NORTON WHO WAS IN A BETTER POSITION TO IGNORE MY RIGHTS TO DUE PROCESS UNDER SCHOOL LAW. MR CAVANAGH DID REPRESENT ME AT A UNEMPLOYMENT HEARING OF APRIL 15, 1993. PRIOR TO THAT HEARING I GAVE MR. CAVANAGH THE COPIES OF THE TWO DOCUMENTS ATTACHED. THE LETTER OF APRIL 14, 1993 IS A SUMMARY OF ISSUES REGARDING THE PREVIOUS UNEMPLOYMENT APPEALS HEARING AND THE TAPES OF THAT HEARING ON DEC 4, 1992. ITEM 3 CLEARLY STATES THAT MY CONSTITUTIONAL "DUE PROCESS" RIGHTS WERE VIOLATED. THE LETTER OF APRIL 13TH, 1993 IS A LETTER EXPANDING ON ITEM 6 OF THE FIRST LETTER I GAVE TO MR CAVANAGH; HE IGNORED BOTH LETTERS, REFUSED TO DISCUSS THEM WITH ME AS DID MRS. NORTON.

MR. CAVANAGH'S REPRESENTATION AT THE APRIL 15TH, 1993 APPEALS HEARING OF MY UNEMPLOYMENT BENEFITS CONSISTED EXCLUSIVELY OF HIS ENTERING LORENE MOORE'S LETTER TO ME OF JANUARY 22, 1993. HE IGNORED THE PRE-EMINENT ISSUE THAT I WAS SUSPENDED WITHOUT PAY, OR DUE PROCESS ALTHOUGH HE WAS FULLY AWARE THAT WAS THE CORRECT STATEMENT OF THE ILLEGAL ACTIONS OF THE BOARD OF EDUCATION. HE WAS ASSISTING THEM IN USING MY DISABILITIES AS A IMPLEMENT OF DISCRIMINATION, AND USING THE LEGAL PROCESS AS A MEANS OF HARRASSMENT AND RETALIATION.

TC-4

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508 FOX AVENUE
BELFORD, N.J. 0771.

DEAR MRS. NORTON AND MR. CAVANAGH.

ENCLOSED IS A COPY OF THE TAPES OF MY APPEAL HEARING AT THE PERTH AMBOY UNEMPLOYMENT OFFICE. THESE ITEMS ARE OF PARTICULAR CONCERN ARE IN THE ORDER OF THE TAPE.

1. LORENE MOORE MISSTATES MY PREVIOUS PREVIOUS SALARY, SCHEDULE, AND REQUEST FOR ACCOMMODATION, BOTH MY DOCTOR AND I SPECIFY THAT ACCOMMODATION AS WAS PREVIOUSLY ARRANGED AT THE HIGH SCHOOL WAS NECESSARY.

2. MS. MOORE CLAIMS THAT ACCOMMODATION ATTEMPT DATES FROM THE START OF SCHOOL ON SEPT. 2, LETTER OF ACCOMMODATION IS DATED. SEPT. 15, 1992.

3. MS. MOORE DOES NOT MENTION THAT OCT. 15 LETTER SAYS "BEFORE YOU CAN ENTER THE CLASS ROOM, I WAS DECLARED UNFIT TO TEACH WITHOUT REGARD TO DUE PROCESS AS BOARD POLICY NO. 432 STATES.

4. MR. COE OUT OF CONCERN FOR MY HEALTH FIGURED OUT HOW TO ACCOMMODATE ME AT EDISON HIGH SCHOOL TEACHING THE SAME SUBJECT AREAS AS PREVIOUSLY WITH THE SAME TIME FRAME OF SCHEDULING AS WAS PREVIOUS ACCOMMODATION. MR. COE TOLD ME THAT MR. FLOR., I.A. SUPERVISOR REFUSED.

5. LETTER TO MEDICAL INSPECTOR WHICH WAS NOT REVEALED. I WOULD CERTAINLY LIKE TO SEE THAT. MR. FLOR, I.A. SUPERVISOR THREATENED TO LOOK INTO MY MEDICAL RECORDS TO FIND A WAY TO HAVE ME DECLARED UNFIT. THREAT WAS RELAYED TO ME BY JOHN GUNDRY, E.T.E.A PRESIDENT.

6. ISSUE OF WHETER OTHER POSITIONS WERE OFFERED TO ME IS IMPORTANT, THE SENIORITY LIST WAS ALTERED AS I REMEMBER IN 1986. IT WAS THE E.T.E.A. GRIEVANCE COMMITTEE HEAD LARRY WHITE WHO TOLD ME THAT IT WAS ALTERED BECAUSE OF A LAW PASSED GIVING VETERANS ADDITIONAL SENIORITY. MR. GUNDRY SAID THAT ISN'T TRUE, I BELIEVE THAT N.J.S.A. 11A:5-9 STANDS. (I AM ALSO CONCERNED THAT SINCE I WAS OFFERED A PART TIME POSITION FOR 1991-1992 THAT THIS MISSPLACEMENT ON THE SENIORITY LIST COST ME $ 11,152.15 BECAUSE OF THE 1/5 PAY REDUCTION THAT MY PART TIME POSITION REQUIRED)

TC-7

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7. AS YOU CAN SEE THIS HEARING RUNS OVER 1 HOUR AND THE SECOND ISSUE OF "AVAILABILITY FOR WORK" HASN'T BEEN HEARD AT ALL. THE ISSUE OF AVAILABILITY FOR WORK IS A STRANGE ONE, IT APPEARS THAT THE STATE OF NEW JERSEY DOSEN'T PROVIDE ACCOMMODATION FOR DISABLED PEOPLE. WHO PAID UNEMPLOYMENT INSURANCE WHEN THEY HAD ACCOMMODATION AND WERE ABLE TO WORK.

SINCERELY,

EDWARD RENAUD.

9504310052

1 OF 2

MAY 28, 1993
EDWARD RENAUD
508 FOX AVE
EELFORD, N.J 07719

SENATOR JOSEPH KYRILLOS
1715 HWY 35
MIDDLETOWN, N.J. 07748

DEAR SENATOR KYRILLOS.

I HAVE BEEN REPEATEDLY TOLD THAT YOU TAKE AN ACTIVE INTEREST IN THE LIVES OF YOUR CONSTITUENTS I THOUGHT IT APPROPRIATE OF EVENTS THAT HAVE TAKEN PLACE IN THE PAST YEAR.

IN THEIR EFFORTS TO DISCRIMINATE AGAINST ME AS A DISABLED PERSON THE EDISON BOARD OF EDUCATION HAS REPEATEDLY VIOLATED BOARD POLICY. STATE AND FEDERAL LAW. IT HAS BEEN MY EXPERIENCE THROUGHOUT THAT NO ONE WANTS TO KNOW ABOUT IT AND ARE WILLING TO FURTHER VIOLATE MY RIGHTS TO CONCEAL WHAT HAS BEEN DONE.

MY ATTACHED AND LENGTHY LETTER TO INCLUDES MUCH OF THE SPECIFICS OF THESE VIOLATIONS IT HAS BECOME A LONG AND COMPLEX STORY. AND ONLY BECAUSE MY RIGHTS CONTINUE TO BE VIOLATED. I'LL JUST MENTION THE CRIMINAL ACTS WHICH HAVE OCCURED EDISON HAS ENGAGED IN CRIMINAL FRAUD, THEFT BY WITHOLDING AND ALSO ENGAGED IN CONSPIRACY WITH MY TAX SHELTERED ANNUITY COMPANY, VALIC, TO CONCEAL THEIR ACTIONS. EDISON HAS ALSO ENGAGED WITH THE WASHINGTON NATIONAL INSURANCE COMPANY IN CONSPIRACY TO DENY ME FUNDS DUE TO ME THRU THE NJEA. DISABILITY POLICY THAT I HOLD A INSURANCE CERTIFICATE FOR SHORT TERM DISABILITY INSURANCE.

WHEN IF FILED DISCRIMINATION CHARGES WITH THE DIVISION OF CIVIL RIGHTS THEY TOLD ME THAT THEY DON'T HANDLE CRIMINAL ACTS DONE TO DISCRIMINATE.

I HAVE N.J.E.A. LEGAL REPRESENTATION BUT I DON'T HAVE COMPLETE CONFIDENCE THAT I CAN GET THEM TO FILE DISCRIMINATION CHARGES AGAINST A NJEA. ENDORSED DISABILITY INSURER, OR VALIC, WHICH IS NOT OFFICALLY ENDORSED BUT MIGHT AS WELL BE.

EDISON HAS BROKEN THE LAW, ENGAGED OTHERS TO CONCEAL THEIR ACTS, ENGAGED WITH WASHINGTON NATIONAL TO DENY ME ANY SOURCE OF INCOME AND WASHINGTON NATIONAL BROKE THE LAW ON TIMELY PAYMENT OF CLAIMS TWICE. I HAVE ALL OF THE PAPERS TO PROVE WHAT I SAY IN THE LETTER.

GJ

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EDISON ALSO ATTEMPTED TO BLOCK MY RECEIVING STATE UNEMPLOYMENT INSURANCE AND DID SO SUCCESSFULLY FROM SEPTEMBER THRU MAY 21, ON MAY 21 I RECEIVED SOME OF THE MONEY DUE TO ME AFTER WINNING AN APPEAL HEARD ON APRIL 15TH. ALL APPEAL HEARINGS FROM DECEMBER THRU APRIL 15TH WERE CANCELLED, OR SIMPLY NEVER SCHEDULED. THE TAPES OF THE HEARING FROM DEC 4TH 1992 THAT I OBTAINED FOR MY SECOND N.J.E.A. ATTORNEYS WERE EDITED TO REMOVE BOTH IMPORTANT TESTIMONY AND AN ACT OF PERJURY BY THE EDISON PERSONNEL DIRECTOR LORENE MOORE.

I WON THE APRIL 15TH APPEAL HEARING ON THE ISSUE OF WHETHER I WAS AVAILABLE FOR WORK, AND THAT I WAS NOT ACCOMMODATED AS TO MY DISABILITY BY EDISON. ON APRIL 15TH EDISON DID NOT SHOW UP FOR THE HEARING AND DID SO WITHOUT NOTIFICATION TO ANYONE. ON MAY 27TH I RECEIVED NOTICE THAT EDISON IS APPEALING THE DECISION, BUT GIVES NO REASON FOR THEIR APPEAL.

THROUGHOUT THIS DISPUTE I HAVE BEEN THE VICTIM OF EDISONS DISCRIMINATION, CRIMINAL CONSPIRACY, AND ATTEMPTS TO DENY MY RIGHTS BY DAMAGING ME FINANCIALLY. NO ONE HAS HELPED ME INVESTIGATE, AND LEGAL HELP HAS BEEN BOTH DIFFICULT TO FIND, AND AT LEAST IN THE CASE OF MY FIRST N.J.E.A. ATTORNEY, A PROBLEM, NOT A SOLUTION.

I NEED HELP AND FOR 8 MONTHS I'VE HAD VERY LITTLE. THE AVERAGE PERSON I'VE TALKED TO THINKS THAT YOUR RIGHTS ARE PROTECTED IN THIS STATE AND COUNTRY BUT FOR NOW I HAVE TO CLOSE THIS STORY WITH THE COMMENT THAT RIGHTS ARE ONLY FOR THE POLITICALLY POWERFUL, GOVERNMENT AGENCIES WHO HOLD THE PURSE STRINGS, AND THAT THE LAW CAN EASILY BE USED TO DESTROY THOSE WHO WANT THEIR RIGHTS OBSERVED.

SINCERELY,

EDWARD RENAUD

MAY 24 1993

DEAR MRS. NORTON.

CONGRATULATIONS AND THANKS TO YOU AND MR. CAVANAGH ON UNEMPLOYMENT DECIDE IN MY FAVOR. IT SEEMS THAT WINNING THERE ADDRESSES THE ESSENCE OF MY PROBLEMS; I HAVE BELIEVED THAT I WAS RIGHT THROUGH THIS WHOLE DISPUTE AND NEEDED WITH SKILLS AND SPIRIT TO POINT OUT THAT THE LAW WAS NOT BEING OBSERVED.

I HAVE BEEN WORKING ON THE TIME LINE OF EVENTS THAT YOU REQUESTED AND THAT PROJECT IS OFTEN INTERRUPTED BY THE CONCERN THAT SOME OF EVENTS RAISES IN MY MIND. THEY ARE:

1. ENCLOSED IS A COPY OF THE MIDDLE SCHOOL SCHEDULE WITH THE TIME VALUES NOTED AND ADDED UP. I BELIEVE I HAVE THE TIME VALUES CORRECT, 45 MINUTE PERIODS, 5 MINUTES PASSING BETWEEN CLASSES. HIGH SCHOOL IS 43 MINUTE PERIODS WITH 4 MINUTES PASSING. HIGH SCHOOL IS A 8 PERIOD DAY WHICH INCREASES VARIABILITY IN SCHEDULING AND PROVIDES THE 2 FREE PERIODS THAT I NEED TO SLEEP. ADDED NOTES ARE HIGHLIGHTED

2. ENCLOSED IS A COPY OF A YEAR END EVALUATION FROM JUNE 1985 AND IS PRETTY MUCH THE USUAL STUFF. THE UNUSUAL IS THAT I TOOK THE STEP OF WRITING AN ADDENDUM. I ADDRESSED ITEM #5 BECAUSE I FELT THAT IT INCORRECTLY REGARDED MY PERSONEL LIFE WHICH IS NOT THE BUSINESS OF THE SCHOOL SYSTEM AND IT WAS A STATEMENT THAT LEFT A UNANSWERED QUESTION AS TO MY ABILITY TO TEACH.

   MY RESPONSE WAS TO CLEAR ANY DOUBT AND ALSO PROVIDES FURTHER EVIDENCE THAT EDISON MOST CERTAINLY KNEW OF MY DISABILITY.

3. THE KNOWLEDGE OF MY DISABILITY BY EDISON IS ALSO CERTIFIED BY THE SITUATION UNDER WHICH I WAS GIVEN A PROFESSIONAL DAY BY THE EDISON SCHOOL SYSTEM TO GO TO WASHINGTON ON SEPTEMBER 25, 1990. I ASKED FOR A PROFESSIONAL DAY PRIOR TO THAT DATE, DISCUSSED BOTH MY DISABILITY AND THAT MY DOCTOR HAD REQUESTED THAT I TESTIFY. MR. CANCELOSI ORIGINALLY DENIED MY REQUEST, I TOOK A PERSONAL DAY BUT WAS TOLD BY MR. COE, DEPT. CHAIRPERSON THAT IT WAS LATER CHANGED TO A PROFESSIONAL DAY THROUGH HIS REQUEST AND SUPPORT. THEY KNEW I WAS GOING TO WASHINGTON TO TESTIFY BEFORE THE NATIONAL COMMISSION ON SLEEP DISORDERS, THEY KNEW WHY AND APPARENTLY SUPPORTED ME BY GIVING ME A PROFESSIONAL DAY.



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4. I DON'T EXPECT EDISON TO ATTEMPT ANY SETTLEMENT BUT IT'S UNLIKELY THAT I WOULD BE ABLE TO EVEN CONSIDER ONE WITHOUT SEEING ALL OF MY PERSONNEL RECORDS HELD BY EDISON. I HAVE A PARTICULAR INTEREST IN: ALL OF MY MEDICAL RECORDS, PREVIOUS SCHEDULES BACK TO 1984, THEIR ACCOUNTING OF MY SICK DAYS, DR. DECASTRO'S RECORDS AND FINDING IN HER EXAMING ME, AND MY PAYROLL RECORDS FOR SEPTEMBER 1992, AND EDISON'S COPY OF MY MEDICAL RECORDS THAT I PROVIDED TO DR. DE CASTRO. I WOULD EXPECT THESE TO INCLUDE ANY RECORDS THAT ARE CURRENTLY IN ANY OF THE SCHOOLS TO WHICH I HAVE BEEN ASSIGNED AND ANY CORRESPONDENCE THAT RELATES TO MY EMPLOYMENT IN EDISON.

I AM WILLING TO GO TO EDISON WITH A TEACHERS ASSOCIATION WITNESS BUT I EXPECT THAT I WILL NEED YOUR ASSISTANCE WITH THIS. EDISON HAS REPEATEDLY BROKEN THE CONTRACT AND THE LAW IN THIS DISPUTE AND I DON'T EXPECT THEM TO CHANGE SOON.

5. AS OF MAY 27 WE CAN SKIP THIS ONE. ER
SINCE I EXPECT TO VISIT EDISON AS SOON AS POSSIBLE ON THE ITEMS IN #4 ABOVE I'D ALSO LIKE TO SEE THE FINANCIAL DISCLOSURE STATEMENTS FOR ALL BOARD OF EDUCATION MEMBERS GOING BACK THREE YEARS WHILE I'M THERE. THESE STATEMENTS ARE PUBLIC DOCUMENTS AND SHOULD BE READILY AVAILABLE.

6. AN ITEM THAT HAS COME TO MIND IS THAT I INVESTIGATED THIS PAST SUMMER. A TEACHER IN EDISON HAD HER SCHEDULE CHANGED BY MR. FLOR BECAUSE SHE WAS UPSET BY HAVING TO TRAVEL TO A MIDDLE SCHOOL AND TEACH CURRICULUM THERE THAT SHE HAD NEVER TAUGHT BEFORE. APPARENTLY EDISON ACCOMMODATES WHEN IT WANTS TO AND DISCRIMINATES WHEN IT WANTS TO.

AND ON THE SAME ISSUE: IN 1991-1992 I WAS HIRED BACK FROM A R.I.F. TO A PART-TIME LONG TERM SUBSTITUTES POSITION, 4 PERIODS, 4 PERIODS PAY, HAD PENSION DEDUCTIONS MADE FOR THE WHOLE YEAR AND WAS GIVEN CREDIT FOR SENIORITY. I WAS FIRST OFFERED

G-4

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A SUBSTITUTE POSITION WITH ONLY SUBSTITUTE PAY, NO BENEFITS, SICK DAYS, PENSION OR SENIORITY. I POLITELY DECLINED THIS POSITION; UNEMPLOYMENT PAYS AS MUCH. I DID ACCEPT THE LONG TERM, PART TIME SUBSTITUTE POSITION BUT CONTACTED THE EDISON TOWNSHIPS EDUCATION ASSOCIATION ON THE ACCEPTABILITY OF THIS ARRANGEMENT BUT I RECEIVED NO ANSWER UNTIL MID OCTOBER.

THIS SITUATION RAISES A NUMBER OF ISSUES: THEY REARRANGED A NUMBER OF SCHEDULES TO MOVE ME INTO A POSITION TEACHING THE SPECIFIC AREAS WHERE I HAVE EXPERIENCE; CHANGED ONE PERSONS JOB FROM TEACHER TO COORDINATOR AND ARRANGED THE SCHEDULE TO ACCOMMODATE MY DISABILITY. THIS PARTICULAR COURSE OF EVENTS WOULD NULLIFY MANY OF THE POSITIONS THAT LORENE MOORE HAS TAKEN; THAT THE POSITION AT THE MIDDLE SCHOOL WAS THE ONLY POSITION I COULD BE PUT INTO; THAT NO SENIORITY OR PENSION RIGHTS ACCRUE AS A LONG TERM SUBSTITUTE; THAT THEY DID NOT KNOW ABOUT MY DISABILITY AND I WAS TREATED BY THE SCHOOL BOARD AS A REGULAR TEACHER TO THE EXTENT THAT THEY NEGLECTED TO REHIRE ME WHEN MY CONTRACT AS A LONG TERM SUBSTITUTE EXPIRED. I JUST CONTINUED TO WORK AND AS I REMEMBER ONLY REHIRED ME WHEN I REMINDED JOHN COE AND DON FLOR THAT THE BOARD HAD FORGOTTEN TO REHIRE ME.

IT MAY WELL BE THAT HIRING ME AS A LONG TERM SUBSTITUTE ON A 4/5 BASIS HAD THE SECONDARY ADVANTAGE OF POSITIONING EDISON TO DENY ME THE FIFTH PERIOD NEEDED FOR FULL PAY THAT 5TH PERIOD WOULD HAVE BEEN TEACHING "P.C. APPLICATIONS." A PREVIOUS GRIEVANCE BY A TEACHER IN EDISON HAD DECIDED THAT SENIORITY, NOT CERTIFICATION WAS THE BASIS FOR ENTITLEMENT TO THAT POSITION. SO FOR THE YEAR 1991-1992 I WAS TREATED IN EVERY OTHER WAY AS A TEACHER, NOT A SUBSTITUTE, BUT WAS DENIED A FULL SCHEDULE WITH A PAY REDUCTION OF APPROXIMATELY $11,000 AND I EXPECT TO MAKE THAT PART OF ANY SETTLEMENT.

AND TO PICK OUT ANOTHER INTERESTING SITUATION: THE TEACHER THAT I REPLACED IN 91-92 DIDN'T SET FOOT IN EDISON HIGH SCHOOL THAT I KNOW OF, I DON'T THINK HE ATTENDED THE OPENING OF SCHOOL FACULTY MEETING AS I DID, HE WAS MOST



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CERTAINLY ILL AND LIKELY HAD A NOTE FROM A DOCTOR AS I DID WHERE DR. FRY INSISTED UNDER THE CIRCUMSTANCES THAT I NOT WORK WITHOUT ACCOMMODATION IN MY POSITION AT WOODROW WILSON MIDDLE SCHOOL. HIS ILLNESS ENTITLED HIM TO LEAVE WITH PAY; MY DISABILITY AND LACK OF ACCOMMODATION ONLY ENTITLED ME TO THREATS, VIOLATION OF MY PRIVACY, BEING SUSPENDED WITHOUT PAY, HARASSMENT BY DR. DECASTRO, DENIAL OF MY RIGHT TO DUE PROCESS WHEN I WAS DECLARED 'UNFIT' BY LORENE MOORE AND DR. DE CASTRO. IN L. MOORE'S OCTOBER LETTER. THE BOARD MINUTES FROM EDISON ARE FULL OF PEOPLE WHO CAN'T WORK AND ARE ON MEDICAL LEAVE. I DON'T THINK THAT ALL OF THESE PEOPLE, AND PARTICULARLY THE TEACHER I REPLACED WHERE ILLEGALLY SUSPENDED WITHOUT PAY BECAUSE THEY WERE ILL, OR DISABLED

PAGE 32 OF THE TEACHERS CONTRACT MAKES NO MENTION OF THE POSITION "LONG TERM SUBSTITUTE". I ASSUME THERE IS SCHOOL LAW ON THAT SUBJECT AND I'M SURE MR. CAVANAGH CAN HELP US WITH ABOVE ISSUES.

ON THE ISSUE OF ACCOMMODATION: MS. MOORE ATTEMPTS TO CONVEY THE IDEA THAT I TAUGHT 3 PERIODS IN 1991-1992, AND THAT I RECEIVED FULL DAY, AND THAT MY SCHEDULE WAS PART TIME BECAUSE OF THE NEED FOR ACCOMMODATION. THIS MISREPRESENTATION IS FROM THE UNEMPLOYMENT APPEAL HEARING. MY ACTUAL SCHEDULE WAS 4 PERIODS, AND 4 WAS ALL I WAS OFFERED AND WAS NEITHER BY REQUEST FOR ACCOMMODATION OR MY PREFERENCE, AND IT WAS FOUR PERIODS AND A 4/5 DUTY PERIOD FOUR DAYS A WEEK. ACCOMMODATION WAS ONLY IN PLACING MY CLASSES AT THE INTERVALS NEEDED, CLASSES WHERE I HAVE EXPERIENCE AND WAS ARRANGED FOR MY NEEDS A WEEK AFTER SCHOOL BEGAN.

7. I RECEIVED NINE UNEMPLOYMENT CHECKS ON SATURDAY, MAY 22. I LIKELY NEED YOUR HELP WITH THIS ISSUE AGAIN BUT I'LL TRY TO RESOLVE IT MYSELF. THE FINDING (DECISION) IS THAT I WAS ELIGIBLE FROM 9/13/92 THROUGH 4/10/93 BUT 6 WEEKS OF BENEFITS ARE MISSING FROM THE END OF SEPTEMBER THRU THE FIRST WEEK OF NOVEMBER AND BENEFITS ARE ONLY PAID UNTIL 2/20/93 INSTEAD OF 4/10/93. THAT LEAVES 13 WEEKS UNPAID, FOR A TOTAL OF $4004. I HOPE THEY CAN EXPLAIN THIS AND RECTIFY THIS PROBLEM, I'M LOSING PATIENCE WITH THEIR PROBLEMS, THEY PAID LITTLE MORE THAN HALF THE AMOUNT THE APPEAL TRIBUNAL DECISION INDICATES THEY SHOULD.



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8. I RECIEVED THE ENCLOSED CORRESPONDENCE FROM THE PHILADELPHIA DISTRICT OFFICE OF THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSION. THE BOTTOM OF THE FIRST PAGE CONCERNS ME IN THAT IT REFERENCES THE NEW JERSEY DIVISION ON CIVIL RIGHTS AS THE AGENCY THAT WILL INVESTIGATE MY CHARGE. MY CONCERN IS THAT THEY WILL ONLY INVESTIGATE THE CHARGES AS FILED, AND LIKELY DO LITTLE OF THAT.

MY NUMEROUS CONTACTS WITH THE ADA ATTORNEY OF THE DAY AND THE JUSTICE DEPARTMENT HAVE AFFIRMED THAT EACH PARTY, EACH ACT OF INTIMIDATION, RETRIBUTION AND EACH VIOLATION OF LAW, BOTH STATE AND FEDERAL SHOULD BE PART OF MY COMPLAINT. THAT MEANS THAT THE VARIABLE ANNUITY LIFE INSURANCE COMPANY SHOULD BE CHARGED WITH THEIR CONCEALMENT OF EDISON'S ACTIONS IN REMOVAL OF MY FUNDS FROM MY ANNUITY. EDISON ACTED IN RETRIBUTION AND VALIC'S ATTEMPT AT CONCEALING THE FRAUDULENT REMOVAL OF MY FUNDS MAKES VALIC A PARTY TO DISCRIMINATION.

WASHINGTON NATIONAL INSURANCE COMPANY ALSO ACTED IN DISCRIMINATION. THEY VIOLATED STATE LAW ON THE TIMELY PAYMENT OF CLAIMS AND THEY DID THAT FIRST BY NOT PAYING MY CLAIM FOR 81 DAYS AND AGAIN BY FAILURE TO PAY ON THE ANNIVERSARY OF THE 30 DAY PERIOD WHICH WOULD HAVE PAID OUT ON MARCH 20, 1993. THAT PAYOUT OF BENEFITS JUST HAPPENED TO BE COINCIDENT WITH THE DATE THAT EDISON WOULD HAVE RECEIVED NOTICE OF THE CHARGES FILED WITH THE N.J. DIVISION ON CIVIL RIGHTS. PAYOUT FOR THIS PERIOD WAS 16 DAYS LATE, MADE ONLY ON MY SPECIFIC REQUEST THAT THEY COMPLY WITH THE LAW, AND A PHONE INQUIRY BROUGHT NO ANSWER AS TO THE CAUSE OF DELAY. AN IN-PERSON INQUIRY BROUGHT THE SAME RESULT, NO EXPLANATION.

BOTH VALIC'S AND WASHINGTON NATIONAL'S ACTIONS ARE MATTERS FOR EEOC. CHARGES UNDER THE A.D.A. BECAUSE THEY ARE AVAILABLE TO ME AS RIGHTS OF EMPLOYMENT.

I CAN ENJOY NO PEACE OF MIND KNOWING THAT THESE PARTIES HAVE BROKEN THE LAW; VALIC TO HIDE EDISON'S ACTIONS AND WASHINGTON NATIONAL AT A TIME WHEN IT ENHANCED EDISON'S ILLEGAL DENIAL OF MY PAY. FOR ME, KNOWING THAT THEY BROKE THE LAW AND NOT CHARGING THEM WOULD MEAN THAT I HAVE CHOSEN TO BOTH CONCEAL AND ACCEPT THEIR ACTIONS. I CANNOT ALLOW MYSELF TO BE IN THAT SITUATION, GOOD PEOPLE DEPEND ON THESE COMPANIES TO HONOR THEIR CONTRACTS, OBSERVE THE LAW, AND UPHOLD THE REPUTATIONS THAT CULTIVATE. I'LL EXPECT YOUR ASSISTANCE IN MAKING A TIMELY FILING AGAINST VALIC AND WASHINGTON NATIONAL. GT

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9. I EXPECT TO TRANSFER THE MAJORITY OF MY FUNDS OUT OF VALIC AND INTO ANOTHER COMPANY'S 403B PLAN. IT WILL REQUIRE THE SIGNATURE OF MY EMPLOYER, EDISON TOWNSHIP. I WOULD HOPE THAT THEY WOULD MAKE NO RESISTANCE TO THIS TRANSACTION BUT I ALSO KNOW EDISON'S EFFORTS TO DENY ME MONEY DUE ME. I WILL LET YOU KNOW IF THEY ATTEMPT TO CAUSE ANY PROBLEMS. UNDER PRESENT CIRCUMSTANCES I WANT TO FREE MY FUNDS FROM ANY SITUATION THAT VALIC OR EDISON CAN CONTROL.

10. IN RESPONSE TO YOUR QUERIES ON MY EXPECTATIONS OF A APPROPRIATE DOLLAR AMOUNT TO FIX ON A SETTLEMENT: I MUST REPLY THAT I DON'T HAVE A CONCRETE RESPONSE. MY RESEARCH WILL NEED TO CONTINUE. I DO KNOW THAT EDISON IS UNLIKELY TO SETTLE, THEY WOULD RATHER SPEND THE TAX PAYER'S MONEY; IT MATTERS LITTLE TO THE LIKES OF DR KRESKY AND LORENE MOORE, THEY WOULD RATHER LOSE IN COURT, AND THEN BLAME SOMEONE ELSE. IN RESEARCHING A SETTLEMENT I HAVE HAD SOME OPPORTUNITY TO DISCUSS VARIOUS MULTIPLIERS AND FORMULAS, THE IMPACT OF EDISON'S MALICIOUS ACTS, AND THAT MY EFFORT TO END EDISON'S DISCRIMINATION BY BRINGING IT TO THE PRESIDENT OF THE SCHOOL BOARD WHO FAILED TO ACT ON THE DISCRIMINATION. AS FACTORS.

I DO KNOW THAT OTHER SETTLEMENTS WERE MADE IN EDISON, ONE OF WHICH ROSE ON A SUPERIOR COURT JURY TRIAL WAS FOR TWO YEARS PAY. THIS PERSON SETTLEMENT WAS MADE BASED ON A LAWSUIT THAT WAS BASED ALMOST EXCLUSIVELY ON STATISTICAL EVIDENCE, THE PERSON WAS NOT HARASSED, THEIR PRIVACY WAS NOT VIOLATED THEY WERE NEITHER THREATENED NOR DENIED DUE PROCESS, AND THEY HAD LOST NO PAY. NO OTHER PARTIES WERE ENGAGED BY EDISON IN CONSPIRACY TO DISCRIMINATE OR WERE PARTIES INVOLVED W FRAUD.

ANOTHER WRONGFUL DISMISSAL SUIT BASED ON DISCRIMINATION AGAINST A DISABLED PERSON WHO WAS IN TRAINING FOR A JOB RESULTED IN A AWARD OF $85,000. THIS CASE WAS WITHOUT THE MALICIOUS CONDUCT THAT EDISON HAS CLEARLY ENGAGED IN. I'LL HAVE TO CONTACT THE PARTY INVOLVED AGAIN AND SEE HOW HE MADE OUT WITH THE MEDIA AND HOW THE MONETARY AWARD WAS DETERMINED

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TO SUMMARIZE AND TIE UP A FEW LOOSE ENDS; EDISON CONVENIENTLY SUSPENDED ME WHEN WASHINGTON NATIONAL WAS IN THE SCHOOLS OFFERING A OPEN ENROLLMENT PERIOD. I HAVE NOT FIXED THE EXACT DATE BUT I'VE BEEN TOLD IT'S THE END OF OCTOBER. I WOULD HAVE ELECTED PLAN NUMBER 4. THE LONG TERM DISABILITY PLAN, BUT I COULDN'T, I WAS NOT ALLOWED TO ENTER THE CLASSROOM AS MS. MOORE STATES. I WAS SUSPENDED, DEPRIVED DUE PROCESS AND THE RIGHT TO ELECT A LONG TERM DISABILITY PLAN. CONSPIRACY CHARGES WOULD APPEAR TO BE IN ORDER AGAINST EDISON AND WASHINGTON NATIONAL INSURANCE COMPANY.

AS I'VE SAID MRS. NORTON. I WANT THEM ALL, I WANT THEM CHARGED WITH EACH ACT. AND EACH PERSON INVOLVED NAMED, DR. DE CASTRO INCLUDED FOR HARASSMENT AND HER FAILURE TO ISSUE HER FINDING.

I WANT AND EXPECT ALL OF MY RIGHTS TO BE OBSERVED AND I KNOW THAT IT WON'T BE EASY. IF WRONG DOING ISN'T STOPPED HERE I'LL HAVE TRULY LOST THE PAST NINE MONTHS. FROM MY LAYMAN'S VIEW ALL OF THE PARTIES INVOLVED WILL CHOKE ON THE PAPER WORK, BOTH THEIRS AND MINE. I'M LOOKING FORWARD TO FEEDING THEM THE PAPERWORK, WATCHING THE FINGER POINTING, GIVING THEM A TASTE OF THEIR OWN MEDICINE, AND MAKING THEM THE VICTIMS OF THERE OWN ACTIONS IN BREAKING THE LAW.

IN MY EVERY CONTACT, PEOPLE, REGULAR HONEST PEOPLE THINK THE SYSTEM WORKS. THEY HAVE NEVER HEARD OF A SITUATION LIKE THIS. WITH YOUR HELP I KNOW IT CAN BE MADE TO WORK, AND WHEN IT'S DONE I MIGHT WANT TO SELL THIS STORY RATHER THAN GIVING IT AWAY.

SINCERELY

EDWARD RENAUD

950137/001-1

AS OF MAY 27, 1993:

I WENT TO DERTH AMBOY ON MAY 26. WEDNESDAY AND THOUGHT I HAD RESOLVED THE LAST OF MY UNEMPLOYMENT PROBLEMS, BUT MY PREDICTION WAS GENERALLY CORRECT. AS OF MAY 27TH I RECEIVED THE ENCLOSED NOTICE OF APPEAL BY EDISON OF THE DECISION BY UNEMPLOYMENT. I WOULD EXPECT THAT THEY AGAIN WILL DO A LITTLE POLITICAL FIXING TO WIN THEIR APPEAL THIS TIME. FOR ME, I'LL WANT TO APPEAL THEIR APPEAL, HAVE A COMPLETE LIST OF THEIR VIOLATIONS OF THE CONTRACT, STATE LAW, FEDERAL LAW AND MORE THAN A FEW QUESTIONS I'LL WANT TO ASK. I'LL EXPECT TO CHARGE THEM WITH AN ADDITIONAL COUNT OF HARASSMENT ON THIS APPEAL. THEY SKIPPED THE HEARING ON APRIL 15, 1993, AFTER SOME EXTENSIVE DELAY BY THEM TO AVOID THAT HEARING.

ENCLOSED ARE COPIES OF THEIR FILING OF AN APPEAL, AND A REQUEST FOR COPIES OF THE TRANSCRIPT FROM THE STATE. I WOULD SEND THEM COPIES OF MINE IF THEY'D LIKE BUT I HAVEN'T FINISHED PAYING FOR THEM YET AND THEY PROBABLY WOULDN'T LIKE MY NOTATIONS REGARDING CERTAIN ISSUES.

MY APPROACH TO THIS PROBLEM REMAINS THE SAME. THEY'VE CHOSEN HARDBALL THROUGHOUT AND I'M READY FOR THAT GAME. I THINK IT'S TIME TO GO AFTER <u>ALL</u> OF THE PLAYERS ON THEIR TEAM, CHARGE THEM AND WASHINGTON NATIONAL, VALIC AND DR. DI CASIRO, I'M TIRED OF BEING THE VICTIM. MAYBE A TITLE II FEDERAL COMPLAINT WOULD LEVEL THE PLAYING FIELD.

AGAIN SINCERELY,

EDWARD RENAUD.

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NEW JERSEY SENATE

JOSEPH M. KYRILLOS, JR.
SENATOR, 13TH DISTRICT
MONMOUTH-MIDDLESEX COUNTIES
1715 STATE HIGHWAY 35
MIDDLETOWN, NJ 07748
908-671-3206
FAX: 908-706-9140

COMMITTEES
CHAIRMAN
COASTAL RESOURCES & TOURISM
MEMBER, EDUCATION

June 14, 1993

Mr. Edward Renaud
508 Box Avenue
Belford, NJ 07718

Dear Mr. Renaud:

Many thanks for your correspondence expressing your concern with the Edison Township School District.

I appreciate your taking the time and trouble to advise me of this situation. In an effort to be of assistance, I have contacted my research staff in Trenton to investigate this matter.

I will be back in touch with you as soon as I have received and reviewed the information in regard to my inquiry on your behalf.

Please do not hesitate to contact me anytime there is a matter of concern to you.

Sincerely,

Joe Kyrillos

Senator Joseph M. Kyrillos, Jr.

JMK:jch

9504370743

NEW JERSEY SENATE

JOSEPH M. KYRILLOS, JR.
SENATOR, 13TH DISTRICT
MONMOUTH-MIDDLESEX COUNTIES
1715 STATE HIGHWAY 35
MIDDLETOWN, NJ 07748
908-671-3206
FAX: 908-706-9140

COMMITTEES
CHAIRMAN
COASTAL RESOURCES & TOURISM
MEMBER, EDUCATION

August 23, 1993

Mr. Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Dear Mr. Renaud:

I have been recently contacted by my research counsel in Trenton pursuant to my inquiry regarding your discrimination case against Edison Township School District.

My counsel advises me that this case goes beyond the boundaries of my position as State Senator, and, unfortunately, I am powerless to intercede on your behalf in this matter. The New Jersey State Constitution prohibits me from exerting my political influence with the legal system or the courts.

Because you are receiving due process from NJEA, the best I can do is recommend that you seek outside legal counsel.

I sincerely regret that my response could not be more favorable. I wish my efforts would have proven more successful.

Please do not hesitate to contact me if I can be of assistance to you with future concerns.

Sincerely,

Senator Joseph M. Kyrillos, Jr.

JMK:jch

9504370014

U[redacted]QUAL EMPLOYMENT OPPORT[redacted]Y COMMISSION
Philadelphia District Office
1421 Cherry Street, 10th Floor
Philadelphia, PA 19102
PH: (215) 656-7020
TDD: (215) 656-7114
FAX: (215) 656-7113

December 14,1993

Our Reference: Charge Number 17E930862
Renaud v. Edison Board of Education

Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Dear Mr. Renaud:

The Equal Employment Opportunity Commission (EEOC) has received your attorney's request for the issuance of a Notice of Right-to-Sue in connection with the above-referenced charge. Because the Respondent in this charge is from the public sector, the Notice of Right-to-Sue must be issued by the U.S. Department of Justice. Therefore, the request has been forwarded to that Agency for action. The Department of Justice will act on your request as soon as possible and issue the Notice of Right-to-Sue directly to you. You will then have 90 days from your receipt of the Notice of Right-to-Sue to file suit in Federal District Court.

If you have any further questions concerning the issuance of the Notice of Right-to-Sue, you may write to the Department of Justice at the following address:

Department of Justice
Civil Rights Division
Employment Litigation Section
Room 4712
P.O. Box 65968
Washington, DC 20035-5968

Please note that with the issuance of the Notice of Right-to-Sue the EEOC will discontinue its administrative processing of this charge.

If you have any questions concerning the charge or the EEOC's processing, please call Edward McCaffrey at 215-656-7050.

Sincerely,

William D. Cook
Enforcement Manager

cc: Sharon Lynch Norton, Esq.
Edison Board of EDucation

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U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE
WITHIN 90 DAYS

JPT:RLW:ljt

Washington, D.C. 20530

January 13, 1994

CERTIFIED MAIL

Mr. Edward Renaud
c/o Sharon Lynch Norton, Esquire
Chamlin, Rosen, Cavanagh & Uliano
Attorneys at Law
P.O. Box 38
West Long Branch, NJ 07764

Re: EEOC Charge Against Edison Board of Education
No. 17E930862

Dear Mr. Renaud:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over that charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title I of the Americans with Disabilities Act of 1990, 42 U.S.C. 12111, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

The investigative file pertaining to your case is located in the EEOC District Office, 1421 Cherry Street, 10th Floor, Philadelphia, Pennsylvania 19102.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

James P. Turner
Acting Assistant Attorney General
Civil Rights Division

By: Rita L. Wilson
Rita L. Wilson
Civil Rights Analyst
Employment Litigation Section

cc: EEOC District Office
Public Schools of Edison Township

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shows reasonable cause to believe that discrimination occurred, the Commission will begin conciliation efforts. If conciliation fails, the charge will be considered for litigation. The Commission's policy is to seek full and effective relief for each and every victim of employment discrimination, whether sought in court or in conciliation agreements before litigation, and to provide remedies designed to correct the discrimination and prevent its recurrence. The Justice Department is the only federal agency that may sue a state or local government for a violation of Title VII or the ADA. EEOC may sue a state or local government for violations of the ADEA or EPA. If the Commission decides not to litigate a charge, a notice of the right to file a private suit in federal district court will be given to the charging party. At the charging party's request, a notice of right to sue also will be issued at any time after the expiration of 180 days from the date the charge was filed.

## EEOC's Mission

THE MISSION of the Commission is to ensure equality of opportunity by vigorously enforcing federal laws prohibiting employment discrimination through investigation, conciliation, litigation, coordination, education and technical assistance.

## Commission Meetings

IN ACCORDANCE with the Government in the Sunshine Act, meetings of the Commission are open to the public. However, all or part of a meeting may be closed for consideration of matters exempted under the Sunshine Act, such as recommendations for litigation, litigation strategy and other specified matters. For information about Commission meetings, call 202-663-4070 (voice) or 202-663-4018 (TDD). Agenda items for Commission meetings are announced in the Federal Register one week in advance of the meeting.



## Headquarters Offices and Their Functions

**Communications and Legislative Affairs:** Serves as the Commission's primary external communications link with the news media, the U.S. Congress, constituency groups, and the public, and conducts internal communications.

**Equal Employment Opportunity:** Develops policies and implements approved affirmative employment programs to ensure equal employment opportunity within EEOC and executes procedures for prompt and fair resolution of EEO complaints.

**General Counsel:** Recommends and conducts all EEOC litigation in class, systemic and individual cases of discrimination and subpoena enforcement actions. Presents the Commission's views as *amicus curiae* in cases in which the Commission is not a party.

**Inspector General:** Conducts internal and external investigations and audits related to the programs and operation of the Commission.

**Legal Counsel:** Serves as principal advisor to the Commission on non-enforcement litigation matters and represents the Commission in defensive litigation and administrative hearings. Prepares Commission decisions on charges involving issues for which there is no precedent, develops all policy guidance for Commission consideration and carries out the Commission's leadership and coordination role for the federal government's EEO programs.

Writes regulations, conducts outreach and education efforts, and coordinates all federal issuances affecting equal employment opportunity.

**Management:** Oversees administrative, financial, personnel and management support services. Develops and administers the Commission's budget.

**Program Operations:** Manages, directs and coordinates field office operations and systemic investigations. Implements the Commission's state and local charge deferral and contracting program and conducts the national EEO survey report program.

**Federal Operations:** Develops policy guidance for

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ROBERT P. McKEVITT
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
(N.J. & PA. BARS)

TELEFAX # (908) 571-8741

May 31, 1994

Hon. Dickinson R. Debevoise, U.S.D.J.
United States District Court
P.O. Box 999
Newark, New Jersey 07101-0999

Re: *Renaud v. Edison Township Board of Education, et al.*
Civil Action No. 94-1626
Our File No. 26089

Dear Judge Debevoise:

I am in receipt of Your Honor's letter regarding the above matter to which you appended Mr. Renaud's April 29, 1994 letter to the Court Clerk, which I had not received from Mr. Renaud. Indeed, when I received your letter, I was in the process of preparing a Motion to be Relieved as Counsel because Mr. Renaud had not answered my recent
1 requests for further direction in this matter. I telephoned your chambers as you requested in your letter and explained to Mr. Laden, for this reason and others, I do not feel that I can represent Mr. Renaud further in any capacity, including the filing of a voluntary dismissal on his behalf.

Pursuant to Your Honor's written request, I am setting
2 down herein the history of this matter and the reasons I seek to be relieved. Should Your Honor prefer, I will also bring a formal motion for same. In any event, I certify to the truth of my statements herein.

3. Mr. Renaud came to this office in February, 1993 and
4 asked Mr. Cavanagh and me to take over his representation from Stephen Klausner, Esq. At that time, he was unemployed and not receiving any employment benefits. He had been employed as a high school Industrial Arts teacher in the Edison School District. During the previous September, he was reassigned to a Middle School position with different hours and course schedules. Mr. Renaud maintained that the employment offered did not reasonably accommodate his disability narcolepsy. The position of the Edison Board was

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5 6 that he had declined to accept available employment in September of 1992. Mr. Renaud specifically asked us to assist him in securing his former position with a reasonable accommodation and to reverse the State Employment's denial of unemployment benefits for the interim period. Prior to our representation, Mr. Renaud had filed a charge of handicap discrimination with the New Jersey State Division of Civil Rights.

7 After this office took over his representation, I immediately contacted the Edison Board attorney and entered into negotiations to secure a position for Mr. Renaud at the High School, which would reasonably accommodate his disability. After meetings with the Board attorney, the superintendent and others, my office successfully secured Mr. Renaud's reinstatement to his former high school position with the accommodation he needed. To the best of my knowledge, he is still working in that position. This was done without waiver of any claim for damages from the 1992-1993 school year, which we agreed would be perfected in Federal District Court pursuant to the Americans With Disabilities Act. To that end, Mr. Renaud's Division of Civil Rights complaint was transferred to the Equal Employment Opportunity Commission and a request for a Right to Sue letter was made.

8 Meanwhile, both Mr. Cavanagh and I represented Mr. Renaud before the State Unemployment Board and successfully obtained a reversal of the original denial of benefits. Mr. Renaud received full unemployment benefits retroactive to the filing date.

9 More than a month before the complaint was due to be filed in Federal District Court, Mr. Renaud received a draft and made some changes. A meeting was scheduled to review the second draft of the complaint with me in my office on March 17, 1994. Up until that meeting, Mr. Renaud had never expressed to us anything but approval and satisfaction with the way in which his case had been handled. However, at the March meeting, he raised issues, theories and discussed parties separate and apart from the discrimination claim, which areas had never been the focus of the agreed upon cause of action. During the meeting, he disclosed for the first time that he had contacted about twenty-five (25) other lawyers to inquire about representation unsuccessfully.

10 I was shocked and somewhat frightened by his demeanor and suggested that after he leave the office, he review the

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second draft of the complaint, and then advise us if he wished to engage other counsel or continue the matter *pro se*. I reminded him that the complaint had to be filed on or before April 18, 1994, which was then about one month away.

11 After one week's time, he telephoned Mr. Cavanagh and told him that he had reviewed the second draft and scheduled an appointment to meet with me on March 28, 1993. Mr. Renaud telephoned to cancel the appointment for personal reasons but did not reschedule an appointment. Consequently, I wrote a letter to him on March 30, 1994 which he received on March 31, 1994 asking him to reschedule the appointment given the filing date and his attempts to seek substitute counsel. (*See* letter from Sharon Lynch Norton, Esq. to Edward Renaud dated March 30, 1994 attached hereto as Exhibit A.)

Still receiving no response, on April 6, 1994 I again wrote to Mr. Renaud asking him to telephone the office. (*See* letter from Sharon Lynch Norton, Esq. to Edward Renaud dated April 6, 1994 attached hereto as Exhibit B.)

On April 7, 1994, my office received a lengthy letter from Mr. Renaud which seemed to memorialize his new desire to expand the anticipated litigation to include defendants and theories outside the discrimination claim, alleging conduct and possible conspiracies of both a civil and criminal nature against Middletown Pharmacy, the disability carrier, his local and state union, a physician, VALIC and possibly others. He also returned a copy of the second draft with revisions. (*See* letter from Edward Renaud to Sharon Lynch Norton, Esq., dated April 3, 1994, attached hereto as Exhibit C.)

On April 8, 1994, I responded in writing to Mr. Renaud. I explained that the agreed upon focus of our

12 representation, at least prior to the March 17, 1994 meeting was to secure his reinstatement with a reasonable accommodation and to file a lawsuit in Federal District Court against his employer pursuant to the Americans With Disabilities Act to recover lost earnings, benefits, pain and suffering, as well as punitive damages. I further stated that on the eve of the filing of the complaint, he apparently wanted to expand the litigation to include defendants and theories separate from what we had agreed was the basis of a discrimination claim. Indeed, in his letter Mr. Renaud stated that the reasons he sought other counsel was the anticipation that if he wanted to sue his union and others, I would have a conflict of interest. (*See* letter of

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Sharon Lynch Norton, Esq. to Edward Renaud dated April 8, 199. attached hereto as Exhibit D.)

Finally, I advised him I was prepared to file the claim upon which we had focused over the last 15 months. However, if he wanted to alter and expand the thrust of the litigation, he was welcome to seek other counsel and I would do everything possible to facilitate a smooth and orderly transition of the file. *Id.* at 3. However, I also advised that absent hearing from him in a timely fashion, I would file the complaint in order to protect his rights. I urged him to call me and/or come in to see me before April 18, 1994. *Id.* at 4.

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It was not until the close of business on Friday, April 15, 1994 that Mr. Renaud faxed me a letter which still did not explicitly state whether he was directing us not to file the complaint, although he said therein that he filed a complaint with the Commissioner of Education. (*See* letter of Edward Renaud to Sharon Lynch Norton, Esq. dated April 15, 1994 attached hereto as Exhibit E.) In any event, by the time his letter was received, the complaint had already been sent to the Court for filing.

On April 19, 1994, I communicated this fact to Mr. Renaud in writing and further informed him that, for the reasons advanced both in the March 17th meeting and his two subsequent letters and his refusal to orally communicate with us about his case, as well as his filing an administrative claim on his own, we could not represent him in the pending federal litigation and would seek to be relieved. (*See* letter from Sharon Lynch Norton, Esq. to Edward Renaud dated April 19, 1994 attached hereto as Exhibit F.) Again I expressed my willingness to cooperate in any way with an orderly transition of his file. *Id.*

That same day Mr. Renaud telephoned this office. The State Department of Labor had sent him a notice of hearing of an appeal by his employer of the granting of his benefits. He spoke to Mr. Cavanagh and myself to confirm his desire to adjourn the hearing, but as soon as I began to tell him of the status of the District Court complaint, he apparently hung up the telephone, as a recording told me to hang up. Again, it appeared that Mr. Renaud did not want to discuss his case with us. We have no knowledge of the case which he said he has since brought before the Commissioner of Education. I did, however, adjourn the hearing before the State Department of Labor as Mr. Renaud had requested.

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14. I have had no further communication from him though I had asked that he inform me if he wanted to withdraw the matter or substitute different counsel. (See Exhibit F.) Consequently, I began preparing a motion to be relieved as counsel. I then received Your Honor's letter with Mr. Renaud's letter to the Clerk enclosed. While it certainly appears from that letter that Mr. Renaud wishes to withdraw his complaint, since he has refused to communicate directly with me about the lawsuit in any way, I feel I am not in a position to represent him even to the extent of signing a Voluntary Dismissal on his behalf.

For all of the above said reasons, I respectfully ask that the Court relieve my office as counsel in this matter and entertain Mr. Renaud's request on a *pro se* basis. The defendants have not been served in the action, so they have not been copied on this letter. I await the further direction from the Court.

I thank Your Honor for your attention and courtesies in this matter and apologize for any inconvenience to the Court which may have occurred.

Respectfully submitted,

SHARON LYNCH NORTON

SLN/mmc
cc: Mr. Edward Renaud

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EXHIBIT A

CHAMLIN, ROSEN, CAVANAGH & ULIANO
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SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
N.J. & PA. BARS

March 30, 1994

Mr. Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718

Re: *Renaud v. Edison Township Board of Education*
Our File No. 26089

Dear Ed:

As you know, we had an appointment scheduled for Monday, March 28, 1994 to review again the complaint which was drafted in the above named matter. I understand from my secretary that you cancelled the appointment for personal reasons which I hope resolved well for you.

You are aware that this complaint must be filed in Federal District Court on or before April 18, 1994, in order to preserve your rights. We have been ready to file this complaint for several weeks but have deferred for your final review. In addition, in our two-hour meeting on March 17, 1994, you indicated for the first time that you had been seeking substitute counsel for some time. Thus, we have yet to resolve who is filing this complaint on your behalf, or whether you are proceeding *pro se*.

It is imperative that you reschedule this appointment immediately so that the complaint is timely filed.

Very truly yours,

SHARON LYNCH NORTON

SLN/mmc

EXHIBIT A

G-22

**SENDER:**
- Complete Items 1 and/or 2 for additional services.
- Complete Items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

4a. Article Number
P317 780 428

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
3/31 mo

5. Signature (Addressee)
Edward Renaud

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, November 1990 ★U.S. GPO: 1991—287-088 DOMESTIC RETURN RECEIPT

P 317 780 428

EXHIBIT A

ALL-STATE LEGAL SUPPLY CO. 1-800-222-0510 EDIT RECYCLED

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APRIL 3, 1994

508 FOX AVENUE

BELFORD, N.J. 07718

DEAR MR. NORTON,

IN REFERENCE TO YOUR LETTER OF MARCH 30, 1994:

THE CAUSE OF CANCELING THAT APPOINTMENT IS THAT MY MOTHER HAS GONE ALMOST COMPLETELY BLIND FROM CATARACTS, AND I AM PRINCIPALLY RESPONSIBLE FOR TAKING CARE OF HER. SHE MISTAKENLY PUT OFF SURGERY IN THE HOPE THAT SHE WOULD BE OF ASSISTANCE TO ME IN MY DISPUTE WITH THE FRANKLIN TOWNSHIP BOARD OF EDUCATION AND THE FRANKLIN TOWNSHIP EDUCATION ASSOCIATION. AT THE AGE OF 78 SHE HAS SOME TROUBLE UNDERSTANDING THAT THESE TWO PARTIES CONSPIRED AT LEAST SINCE THE TIME I WAS KICKED BY RECOUPMENT IN 1984 TO END MY EMPLOYMENT BY USE OF REDUCTION-IN-FORCE. SPECIFICALLY THEY HAVE RETAINED IN EMPLOYMENT INDIVIDUALS WHO LACK RESIDENT CERTIFICATION AND IN 1985 GRANTED A VETERAN, RALPH VENTOLA ONE YEAR SERVICE TIME UNDER N.J.S.A. 18A:28-12. THEY THEN FOLLOWED A COURSE OF ACTION THAT CONTINUES TO THIS DAY, WHICH IS TO INTENTIONALLY VIOLATE MY RIGHTS AS A TENURED TEACHER DAMAGING ME FINANCIALLY AND DAMAGING MY SENIORITY BY USING A FRAUDULENT SENIORITY LIST TO JUSTIFY REDUCING ME TO PART TIME POSITIONS.

I HAVE EXPLAINED THIS SITUATION TO YOU IN THE HOPE THAT I WOULD GET SOME HELP, AND

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EXPLAINED IT TO MY MOTHER ADDING THAT IF SHE EXPECTED TO "SEE" MY RIGHTS OBSERVED SHE BETTER GET HER EYES FIXED AND LIVE ANOTHER 20 YEARS.

4. AS FOR THE COMPLAINT IN FEDERAL DISTRICT COURT I FIRMLY BELIEVE THAT IT IS BEYOND CORRECTION. IT IS A LONG DELAYED RESPONSE TO WHAT WAS AND IS A A.D.A. DISPUTE WHERE THE BOARD & E.T.E.A HAVE ENGAGED IN MALICIOUS PROSECUTION, AND MY RIGHTS UNDER N.J.S.A. 18A "SCHOOL LAW" AND N.J.S.A. 10:5-1 ET SEQ. HAVE BEEN REGULARLY VIOLATED. AS I HAVE PREVIOUSLY STATED I RECOGNIZED THAT MR FLOR WAS DETERMINED AND LYING TO ASSURE THAT I WOULD BE PUT INTO A POSITION WHERE ACCOMMODATIONS TO MY DISABILITIES IT WOULD DAMAGE MY FINANCES AND SENIORITY.

3. A FEDERAL COMPLAINT WAS NOT MY CHOICE, THERE EXISTED A ARRAY OF VENUES THAT COULD HAVE BEEN CHOSEN AND I WANTED THE MOST RAPID ONE. AS I RECALL DISCUSSIONS HAVE PROGRESSED FROM FEB 2, 1993 WHERE MR CAVANAGH'S PRIMARY CONCERN WAS THAT I HAD NO HEARING, NO INCOME, AND NO PAY FROM EDISON, AND THAT I SHOULD MY REPRESENTATION THRU THE N.J.E.A. TO HIM. THIS WAS ACCOMPLISHED DESPITE MICHAEL PARISE'S OPPOSITION. FEBRUARY 16 1993 I DELIVERED MY FILE DESPITE STEPHEN KIRSCHNER'S OPPOSITION. I COMPLETED THE FILE BY REPLACING THE DOCUMENTS ON VALIC WHERE THE BOARD

E-B

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FRAUDULENTLY REMOVED MY MONEY FROM MY ACCOUNT AND VALIC TRIED TO AVOID TELLING ME ABOUT IT.

On MARCH 2, 1993 WE DISCUSSED FILING IN SUPERIOR COURT IN MONMOUTH COUNTY WHICH WAS LATER NEGATED AS A POSSIBILITY BECAUSE EDISON IS IN MIDDLESEX COUNTY. WE ALSO DISCUSSED THE ACTIONS OF WASHINGTON NATIONAL INSURANCE COMPANY WHO HAD DENIED MY CLAIM AND VIOLATED THE STATE LAWS ON INSURANCE. AS YOU STATED IT SEEMED UNUSUAL BECAUSE WASHINGTON NAT'L HAD A CAUSE OF ACTION AGAINST EDISON FOR DENYING ME ACCOMMODATION TO MY DISABILITY RESULTING IN MY CLAIM FOR BENEFITS. WHEN I MENTIONED THAT I THOUGHT THIS SHOULD BE BROUGHT TO THE JUSTICE DEPARTMENT YOU CANCELLED THE FACT-FINDING HEARING AT THE DCR ON THE CHARGES THAT I FILED, AND I MISTAKENLY TOOK YOUR ADVICE DROPPED MY DCR COMPLAINT. AS YOU KNOW I WAS NOT ALLOWED TO FILE THE CHARGE THEY DESCRIBED AS CRIMINAL REGARDING EDISON'S REMOVAL OF FUNDS FROM MY ANNUITY, VALIC AND THEY EDITED OUT ALL OF THE CHARGES OF RETRIBUTION, INTERFERENCE AND COERCION REGARDING MR. FLOR, DR. DE ASTRO, AND WASHINGTON NATIONAL.

YOUR POSITION IN APRIL WAS TO TAKE MY CASE TO FEDERAL COURT BECAUSE OF THE IMPROPRIETIES IN MY CASE, WHICH ADDED 4 MONTHS TO THE DATE

THAT A LAWSUIT COULD BE FILED (A ADDITIONAL FOUR MONTHS WITHOUT ANY INCOME). THE 90 DAY RIGHT-TO-SUE LETTER THEN DID NOT ARRIVE IN AUGUST BUT IN JANUARY, 5 MONTHS LATER. THUS ANY ACTION TO FILE CHARGES WAS DELAYED UNTIL MARCH 15, 1994.

I BELIEVE THAT I AM SUBSTANTIALLY CORRECT IN THE ABOVE NARRATIVE OF EVENTS. IF YOU FEEL I'M INCORRECT IN ANY WAY PLEASE ADDRESS ANY ERRORS IN A LETTER TO ME. I WOULD ALSO LIKE TO HAVE SENT TO ME TWO ITEMS: THE RIGHT TO SUE LETTER AND THE SCHEDULE PROPOSED BY DR. JOSEPH KRESKEY ON SEPTEMBER 27TH 1993. IN WHICH HE AGAIN PROPOSES TO VIOLATE THE LAW N.J.S.A. 18A:16-10 BY AGAIN REDUCING MY PAY AND DAMAGING MY SENIORITY.

THROUGHOUT THIS DISPUTE I HAVE FURNISHED ANY MATERIAL THAT I THOUGHT RELEVANT, EXPRESSED MY CONCERNS AND MADE EVERY ATTEMPT TO FILE COMPLAINTS WHEN I POSSIBLY COULD. THE FOLLOWING ISSUES HAVE BEEN ADDRESSED BY ME DIRECTLY OR IN THE CONTEXT OF MY LIMITED UNDERSTANDING OF THE SITUATION.

- 1985 E.T.E.A. REVERSES MY SENIORITY IN ORDER TO DISCRIMINATE WITH THE BOARD OF EDUCATION.
- 1991-1992 THEY SUCCESSFULLY LIE + COERCE ME INTO A PART TIME POSITION BY FRAUD, TAKING MY MONEY AND DAMAGING MY SENIORITY.



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- 1991-1992 DENY ACCOMMODATION TO MY DISABILITY ENGAGING IN MALICIOUS PROSECUTION; MY TEACHING ASSIGNMENT IS BASED ON FRAUD. I WOULD EXPECT THAT WITHOLDING MY PAY CAME ON FRAUD MAKES IT THEFT BY WITHOLDING
- UNEMPLOYMENT - DENIAL OF DUE PROCESS, PERJURY BY LORENE MOORE, DESTRUCTION OF SWORN TESTIMONY (AND UNDISCLOSED - STEPHEN KLAUSNER SUBORNS PERJURY BY L. MOORE REGARDING MY VOLUNTARILY BEING EXAMINED BY DR. DE CASTRO.)
- WASHINGTON NATIONAL INSURANCE COMPANY CONSPIRACY, MALICIOUS DENIAL OF MY CLAIMS OBSTRUCTING, AND A MALICIOUS FRAUD INVESTIGATION
- AND THE LIST GOES ON, 1984 UNTIL PRESENT AND INCLUDES THREATS OF MURDER, AND PROBABLY WORSE.

I WOULD LIKE YOU TO STATE IN WRITING THAT THIS COMPLAINT WILL NOT BLOCK MY FILING PRO SE IN SUPERIOR COURT OR AT ANY OTHER VENUE.

THE POSITION TAKEN FOR THE PAST YEAR WHILE I HAVE BEEN REPRESENTED BY YOU AND MR CAVANAGH HAS BEEN THAT I SHOULD ACCEPT RETRIBUTION, INTIMIDATION, HARASSMENT VIOLATIONS OF MY RIGHT TO DUE PROCESS, FINANCIAL HARDSHIP, SEVERE EMOTIONAL STRESS, INVASION OF PRIVACY AND CONTINUING VIOLATIONS OF MY RIGHTS UNDER SCHOOL LAW.

6 OF 11 APRIL 3, 1994

REGARDING MY SEEKING SUBSTITUTE COUNSEL:

YOUR STATEMENT THAT IN YOUR LETTER OF MARCH 30 1994 IS INCORRECT; IN OUR SEPTEMBER MEETING IN OUR DISCUSSION OF MY COST INCURRED WE DISCUSSED THE ITEM "ATTORNEY COSTS" IN THE AMOUNT OF $820.00. IF YOU WOULD LIKE I WILL WRITE DOWN THAT PART OF OUR CONVERSATION FROM MEMORY. AS YOU KNOW MY MEMORY IS ACCURATE. LONG AND A LIKELY CAUSE THAT I'VE BEEN KEPT OUT OF ANY SITUATION WHERE I WOULD BE DEPOSED, FILED SWORN TESTIMONY OR AT LEAST EMBARASS THE HELL OUT OF SOME PEOPLE, AND IT PROTECTS THE LENGTHY LIST OF THOSE WHO CONSPIRED, OR ACTED TO AIDE AND ABET DISCRIMINATION.

THE CAUSES OF MY SEEKING SUBSTITUTE COUNSEL:

- THE DCR FACT-FINDING HEARING FOR MAY 8, 1993 ON YOUR STATED PREMISE THAT IF I "LOST" AT THAT HEARING I WOULD HAVE NO RIGHT TO ANY APPEAL
- THE STATED PREMISE THAT I HAD TO DROP MY DCR COMPLAINT BEFORE A ACTION IN SUPERIOR COURT COULD BEGIN.
- I HAD BEEN DENIED THE RIGHT TO FILE THE TRUE AND CORRECT COMPLAINTS AT THE DCR AND E.E.O.C. REGARDING THE ACTIONS OF Dr. DE CASTRO, VALIC, WASHINGTON NATIONAL, ETC. AND INSISTED ON HELP IN FILING CHARGES AND THOSE CORRECT CHARGES WERE NEVER FILED.

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- DISCOVERY THAT WAS TO TAKE PLACE AFTER THE APRIL 28, 1993 MEETING WITH DR. KRESKEY, L. MOORE, MR. FICENECKI AND D. FLOR WAS CANCELLED.
- I HAD NO PROTECTION FROM RETALIATION, DENIAL OF DUE PROCESS, NO RIGHT TO FILE CHARGES AND GENERALLY NO INCOME.
- AT EACH DISCUSSION OF THE N.J.E.A. FAILURE FOR MY REPRESENTATION I CLEARLY STATED THAT I WANTED TO BE RID OF THE N.J.E.A.. APPARENTLY THEY OWN MY RIGHTS AND THERE IS NO ESCAPE.
- I REGARDED YOUR QUESTION OF HOW MUCH I WAS WILLING TO SPEND TO PROTECT MY RIGHTS AS A INQUIRY INTO MY FINANCIAL ABILITY TO PURSUE THE N.J.E.A. FOR FAILING TO REPRESENT ME.
- ON FEB. 9, 1994 I OUTLINED THE ACTIONS OF THE MIDDLETOWN PHARMACY IN CUTTING OF MY MEDICATION DAYS AFTER MR. FLOR'S THREAT TO LOOK INTO MY MEDICAL RECORDS AS A MEANS OF GETTING RID OF ME. YOU DESCRIBED IT AS MORE EVIDENCE OF CONSPIRACY AND DECLINED TO ACCEPT THE COPY OF EVIDENCE.
- WHEN I SAID THAT WASHINGTON NATIONAL WOULD LIKELY MALICIOUSLY CLAIM FRAUD AND INITIATE A INVESTIGATION TO FIND SOMETHING TO HELP FOSTER CONTINUE TO BATTER ME, OR DAMAGE MY RELATIONSHIP WITH ANYONE I MIGHT CONTACT THERE WAS NO REACTION OR RESPONSE. I EXPECT THAT I AM CORRECT AND THEY ARE LOOKING TO PROTECT FELLOW CONSPIRATORS.

9501370033

- YOU HAVE ACKNOWLEDGED THAT I HAVE THE MATERIAL TO PREVAIL AGAINST EDISON B.U.T. I HAVE HAD NO REASONABLE MEANS TO PRESENT IT.

IN OUR TWO HOUR MEETING OF MARCH 17, 1994 I ACKNOWLEDGED THAT I CAN NOT FIND A ATTORNEY TO REPRESENT ME AT ANY PRICE. I WILL WITHOUT THE SPECIFICS OF WHAT I DID LEARN FROM OTHER ATTORNEY PRINCIPALLY BECAUSE MR. CAVANAGH HAS EXPRESSED CONCERN THAT THE N.J.E.A. WAS LIBELED, MUCH AS MICHAEL PARISE THREATENED LIBEL IF I SAID ANYTHING ABOUT STEPHEN KLAWNER.

I SOUGHT SUBSTITUTE COUNSEL ON MY CORRECT PRESUMPTION THAT A FEDERAL VENUE WAS CHOSEN FOR DELAY AND PRECLUDED MY FILING OF CHARGES OR COMPLAINTS ANYWHERE ELSE. I ANTICPATE THAT IF I WANTED TO SUE WASHINGTON NAT'L, UALIC, OR EDISON'S CO-CONSPIRATOR THE E.T.E.A. OR FILED AT PERC. YOU WOULD CLAIM CONFLICT OF INTEREST, LEAVING ME AS A DISABLED PERSON AT A VENUE THAT WAS NOT MY CHOICE, IS THE MOST EXPENSIVE, UNSYMPATHETIC, AND DIFFICULT FOR A INDIVIDUAL WHO IS HANDICAPPED AND FORCED TO APPEAR "PRO SE."

THE SUGGESTION ADVANCED BY MR CAVANAGH THAT I FIND OTHER N.J.E.A. COUNSEL IS ABSURD. I HAVE HAD 18 MONTHS OF N.J.E.A PAID ATTORNEYS; NO PROGRESS OR RIGHTS, AND 18 MONTHS OF HELL INFLICTED ON ME.



0504370204

I CERTAINLY SHARE YOUR CONCERN THAT YOU MIGHT BE IMPLICATED IN CONSPIRACY OR A R.I.C.O OFFENSE, I RECOGNIZED THAT POSSIBILITY LONG AGO AND AS MR. CAVANAGH HAS ACKNOWLEDGED I'M NOT A ATTORNEY. I MOST CERTAINLY WARNED YOU AND MR. CAVANAGH THAT EDISON WAS KNOWN FOR VIOLATING PEOPLE'S RIGHTS, ACTING WITH OTHERS, BRINGING PEOPLE INTO THEIR SCHEMES IN SMALL WAYS, USING THEM AND TOSSING THEM TO THE WOLVES. WHEN MR. CAVANAGH ASKED ME WHO HAD THE CORRECT VERSION OF THE TAPES FROM THE DEC. 4, 1992 UNEMPLOYMENT HEARING I SAID PROBABLY EDISON, THEN WOULD USE THEM TO BLAME LORENE MOORE AND BLACKMAIL HER OUT OF HER JOB. WHAT COULD SHE DO; ADMIT PERJURY? SHE WOULD LOSE HER JOB. DR. KRESKEY KEEPS HIS NAME OFF HIS DIRTY WORK. I PREDICTED L. MOORE RESIGNATION IN MARCH AND BY JULY 1993 I WAS RIGHT. THAT SHOULD SERVE AS A EXAMPLE TO ANYONE WHO IS WILLING TO ASSIST THEM IN THEIR DIRTY WORK.

I AM NOT CHOOSING TO APPEAR "PRO SE", THIS FEDERAL COMPLAINT EFFECTIVELY ASKS ME TO CONCEAL CONSPIRACY, PERJURY, DESTRUCTION OF SWORN TESTIMONY FRAUD UNDER THE "COBRA LAW"; AND SECURITIES FRAUD. I HAVE MADE IT CLEAR THAT I WILL NOT DO THAT, I'VE SPENT 10 YEARS BEING THEIR VICTIM, I WILL NOT ACCEPT A LIFETIME OF THAT.

E-B

G-53

950437000765

I CONTINUE TO HOLD THE N.J.E.A., E.T.E.A. RESPONSIBLE FOR LEGAL REPRESENTATION, AND ACKNOWLEDGE THAT THE CONFLICT OF INTEREST IS THE N.J.E.A.'S PROBLEM, NOT MINE. I DID NOT INVOLVE THE E.T.E.A. IN DISCRIMINATION, THEY CHOSE TO VIOLATE MY RIGHTS WITH MALICIOUS INTENT AND INVOLVED OTHERS TO AIDE AND ABET DISCRIMINA

I WOULD EXPECT THAT ANY ATTORNEY WHO ACCEPTED MY CASE AND N.J.E.A. ANY WORLD LOOK TO THEIR INTERESTS FIRST AND MY CASE SECOND. LET THE N.J.E. RESOLVE THEIR DILEMNA, THE N.J.E.A. HAS RESPONSIBILITY FOR WHAT HAS HAPPENED FOR 18 MONTHS DURING A PROLONGED "EMPLOYMENT PROBLEM"

AS TO EDISON'S DEFENSE, I WOULD EXPECT THEM TO CONTINUE AS USUAL; THREATS, FORGED DOCUMENTS ALTERED TAPES, CLAIMS THAT I ALTERED DOCUMENTS, KNEW THAT MY SENIORITY WAS INCORRECT AND WAS VACATIONING ON UNEMPLOYMENT OR DISABILITY. THEY'VE HAD PLENTY OF TIME TO CONTINUE BREAKING THE LAW AND PLENTY OF HELP DOING IT. AS YOU KNOW I'VE HAD NO HELP INVESTIGATING, DISCOVERING LEGAL VIOLATIONS. UNDER SCHOOL LAW OR AND OTHER LAWS. EDISON AND THE E.T.E.A. ARE RESPONSIBLE FOR CLAIMS TO WASHINGTON NATIONAL, THEY ARE A RESULT OF THEIR CONSPIRACY TO OBSTRUCT MY RIGHTS USING THE R.I.F. PROCESS AND A FRAUDULENT SENIORITY LIST, IT'S THEIR FRAUD AND THEIR RESPONSIBILITY AS IS MY UNEMPLOYMENT CLAIM.

E-B

 APRIL 3, 1994

THE PREMISE FOR ANY SUIT SHOULD BE MALICIOUS ABUSE OF THE LEGAL PROCESS (THE A.D.A. LAW), USING A CIVIL ACTION TO VACATE A CRIMINAL FRAUD. I WANT MY RIGHTS REPRESENTED, I.N. 18 MONTHS THEY HAVE BEEN VIOLATED AND IGNORED, AND APPARENTLY THE LINE BETWEEN CIVIL LAW AND CRIMINAL LAW WAS CROSSED LONG AGO.

PLEASE SUPPORT IN WRITING THAT THIS COMPLAINT WILL SERVE SOME OTHER PURPOSE OTHER THAN TO FURTHER DELAY AND OBSTRUCT MY RIGHTS. I WILL EXPLAIN IT'S PURPOSE AS I UNDERSTAND IT.

IF I AM FORCED TO APPEAR "PRO SE" IN THIS MATTER I WILL DO SO, HAVING NO OTHER CHOICE. MY DISABILITIES WILL SEVERELY IMPAIR MY ABILITY TO PURSUE MY RIGHTS, A SITUATION THE BOARD AND E.T.F.A. HAVE USED TO VIOLATE MY RIGHTS SINCE 1984, WHEN THEY FIRST CONSPIRED TO VIOLATE THEM. APPEARING "PRO SE" I WILL CHOOSE THE TIME, THE VENUE AND THE CORRECT LIST OF DEFENDANTS. I HAVE TRIED TO FOLLOW THE LAW AND LEARN IT AT THE SAME TIME WITHOUT HELP PROTECTING MY RIGHTS. I CAN EXPLAIN MY ACTIONS IN THIS TO DISPUTE AND I'm PROBABLY THE ONLY ONE WHO CAN. I'VE RETURNED A COPY OF THE COMPLAINT, IT IS THE WRONG COMPLAINT, WRONG VENUE, WITH TOO FEW DEFENDANTS.

SINCERELY,

Edward Ruesly

E-B

ALL-STATE LEGAL SUPPLY CO.

9504370028

EXHIBIT C

...MLIN, ROSEN, CAVANAGH & U...

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
288 NORWOOD AVENUE
P.O. BOX 38
WEST LONG BRANCH, N.J. 07764
(908) 229-3200
TELEFAX # (908) 571-8741

GEORGE M. CHAMLIN
CERTIFIED CIVIL TRIAL ATTORNEY
RONALD B. ROSEN
CERTIFIED CIVIL TRIAL ATTORNEY
FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
THOMAS W. CAVANAGH, JR.
N.J., N.Y. & D.C. BARS
CHARLES J. ULIANO
CERTIFIED CIVIL & CRIMINAL TRIAL ATTORNEY
KENNETH W. CHAMLIN
N.J. & N.Y. BARS

ROBERT P. McKEWITT
SHARON LYNCH NORTON
N.J. & N.Y. BARS
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
N.J. & PA. BARS

April 6, 1994

Mr. Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Re: Renaud v. Edison Township Board of Education
Our File No. 26089

Dear Mr. Renaud:

On March 30, 1994, we sent you a certified letter which you received on March 31, 1994. We had asked you to contact us immediately regarding the filing of the Federal District Court complaint in the above named matter. As you were already aware, the complaint must be filed on or before April 18, 1994 in order to preserve your rights. You have not responded to our letter, nor have you telephoned our office to make an appointment.

As we indicated to you in our last letter, your indication that you are seeking substitute counsel has left us in a quandary as to what you intend us to do about the filing of the complaint. In addition, you informed Mr. Cavanagh that you were still reviewing the second draft of the complaint and wanted to discuss the same with us. Yet, you have not done so. If your personal situation is making the scheduling of an appointment difficult, just let us know that so that we can work around it. Please do not simply ignore our requests to contact us. We cannot represent you without your cooperation.

Again, kindly telephone us upon receipt of this letter.

Very truly yours,

SHARON LYNCH NORTON

SLN:rnf

9504370069

EXHIBIT C

P 504 370 110

**SENDER:**
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Edward Renaud
508 Fox Avenue
Belford, NJ 07718

4a. Article Number
P 074 523 685

4b. Service Type
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
4/16/94

5. Signature (Addressee)
Edward Renaud

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 *U.S. GPO: 1993—352-714 DOMESTIC RETURN RECEIPT

EX-D

ALL-STATE LEGAL SUPPLY CO.

9504370011

EXHIBIT D

CHAMLIN, ROSEN, CAVANAGH & ULIANO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
268 NORWOOD AVENUE
P.O. BOX 38
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(908) 229-3200
TELEFAX # (908) 571-8741

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RONALD S. ROSEN
CERTIFIED CIVIL TRIAL ATTORNEY
FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
THOMAS W. CAVANAGH, JR.
N.J., N.Y. & D.C. BARS
CHARLES J. ULIANO
CERTIFIED CIVIL & CRIMINAL TRIAL ATTORNEY
KENNETH W. CHAMLIN
N.J. & N.Y. BARS

ROBERT P. McKEVITT
SHARON LYNCH NORTON
N.J. & N.Y. BARS
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
N.J. & PA. BARS

April 8, 1994

Mr. Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Re: Renaud v. Edison Township Board of Education
Our File No. 26089

Dear Mr. Renaud:

Yesterday we received your letter dated April 3, 1994. I was saddened to hear about your mother's situation, which I hope is improving.

Your letter appears to be a summary of statements which you made to us for the first time in our meeting of March 17, 1994. That meeting was originally scheduled to review suggested changes that you made to the first draft of the complaint, which we prepared for filing in a Federal District Court action alleging employment discrimination. Up until that meeting, you had never expressed to us anything but approval and satisfaction with the way in which your case had been handled. However, during that March meeting, you raised issues, theories, and discussed parties separate and apart from the discrimination claim, which areas had never been the focus of the agreed upon cause of action. Both Mr. Cavanagh and I expressed our shock at this sudden change in your demeanor and the departure from what had clearly been our joint litigation plan over the last 15 months.

During the meeting, you also disclosed for the first time that you had contacted about twenty-five (25) other lawyers to inquire about representation. You left our office that night with a second draft of the complaint to review. We understood that you would contact us immediately upon completion of same, and that you would then advise us whether, under the circumstances of your just recently voiced dissatisfaction, you wished to engage other counsel or continue the matter pro se. As you are aware and we discussed, the complaint must be filed on or before April 18, 1994, which was then one a month away.

9504370072

END

G-4

After one week's time, you telephoned Mr. Cavanagh to tell him that you had reviewed the second draft and would make an appointment to meet with me, which you scheduled for March 28, 1993. Unfortunately, you were unable to keep that appointment for personal reasons. Since you did not schedule another appointment, I wrote to you on March 30, 1994 asking you to contact this office immediately to reschedule same, and again reminding you of the April 18th deadline. You apparently received that letter on March 31, 1994, however, you did not re-contact us or make another appointment to meet with us. Instead, on April 7, 1994, we received the lengthy letter referenced above which seems to memorialize the desire to expand the anticipated litigation to include defendants and theories outside the discrimination claim, alleging conduct and possible conspiracies of both a civil and criminal nature, against Middletown Pharmacy, the disability carrier, your local and state union, a physician, VALIC, and possibly others.

When you first came to this office and asked us to take over your representation from Stephen Klausner, Esq., in February of 1993, you were unemployed and not receiving any unemployment benefits. The position of the Edison Board was that you had declined to accept available employment in September, 1992. You maintained that the employment offered did not reasonably accommodate your disability. We were asked to assist you in securing your former position with a reasonable accommodation and to also reverse the State Employment's denial of unemployment benefits in the interim.

From the outset of our representation of you, each step that was taken was explained to you and was met with approval and satisfaction. In fact, you regularly applauded and thanked me for the aggressive way that your case was being handled. Shortly after this office took over your representation, I immediately contacted the Board attorney and entered into negotiations to secure a position at the High School with reasonable a accommodation in the schedule given your disability of narcolepsy. You were present and participated in the meetings and conferences which ultimately resulted in the Board's reinstatement of you in September, 1993 to your former high school position with the accommodation in scheduling to allow for your disability. This was done without waiver of any claim for damages for the 1992-1993 school year, which we agreed would be perfected in Federal District Court pursuant to the Americans With Disabilities Act. Meanwhile, Mr. Cavanagh and I represented you before the State Unemployment Board and successfully appealed their original denial of benefits, and you then received benefits retroactive to the filing date.

9504370073

In preparation for the Federal lawsuit, the Division of Civil Rights complaint (filed by you prior to our representation) was transferred to the Equal Employment Opportunity Commission ("EEOC"). Thereafter, we requested a right to sue letter and made every effort to secure this administrative exhaustion of remedies as quickly as possible. Apparently, the Justice Department reviews EEOC complaints filed against a government agency before a right to sue letter is issued, and the process takes time. In any event, a right to sue letter was issued, and we prepared the complaint to be filed within 90 days. Indeed, we met with you beforehand and advised you as to how we would proceed.

Given what we have accomplished on your behalf over the last year, it is difficult to imagine how you can state as you do in your April 3rd letter that, "the position taken for the past year while I have been represented by you and Mr. Cavanagh has been that I should accept retribution, intimidation, harassment violations of my rights to due process, financial hardships, severe emotional stress, invasion of privacy, and continuing violation of my rights under school law."

There was never a question raised until March 17, 1994 that the agreed upon focus of our representation was to secure your reinstatement with a reasonable accommodation and to file a lawsuit in Federal District Court pursuant to the Americans With Disabilities Act to recover lost earnings, benefits, pain, and suffering, as well as punitive damages. Now, on the eve of filing the complaint, you want to expand this litigation to include defendants and theories separate from what we had agreed was a discrimination claim. Clearly, this was your understanding also as evidenced by the statement in your last letter that you recently sought substitute counsel because you "anticipate that if [you] wanted to sue Washington Nat'l, VALIC, or Edison's co-conspirator, the E.T.E.A. or file at PERC [I] would claim conflict of interest."

We are prepared to complete the last step toward resolving the discrimination dispute by filing the complaint that names those parties and issues upon which we had focused over the last 15 months. Certainly, a recoupment of your seniority rights is part of the requested relief. Should you desire to expand the litigation to include additional parties and theories, you are certainly welcome to seek other counsel to do that. We would do everything possible to facilitate a smooth and orderly transition of the file.

9504370074

In order to protect your rights by April 18th, we will file the complaint which names those parties previously agreed upon and issues raised, unless you direct us, in writing, not to file the complaint.

We would prefer to meet personally with you before April 18, 1994, even though you have not scheduled an appointment as we have asked. We are still available to speak with you at your convenience.

Very truly yours,

Sharon Lynch Norton

SHARON LYNCH NORTON

SLN:rnf

9504370075

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- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
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3. Article Addressed to:

Mr. Edward Renaud
508 Fox Avenue
Belford, NJ 07718

4a. Article Number
P 074 523 686

4b. Service Type
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
4-18-94

5. Signature (Addressee)
Edward Renaud

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 *U.S. GPO: 1993—352-714 DOMESTIC RETURN RECEIPT

9504370071 6

EX-D

9504370077

FAX 908-571-8741

APRIL 15, 1999
508 FOX AVE.
BELFORD, N.J. 07718

DEAR MRS. NORTON,

PLEASE BE ADVISED THAT I HAVE FILED BEFORE THE COMMISSIONER OF EDUCATION C/O THE BUREAU OF CONTROVERSIES AND DISPUTES REGARDING DISCRIMINATION THAT BEGAN IN 1984.

IN YOUR LAST LETTER YOU WERE NOTABLY UNABLE TO SUPPORT THAT A FEDERAL FILING WOULD DO ANYTHING MORE THAN DAMAGE MY RIGHTS. I HAVE GIVEN YOU DOCUMENTS THAT WOULD POINT TO CONSPIRACY, COLLUSION, AIDING AND ABETTING WITH NO ADVICE OR RESULTS.

I EXPECTED PROTECTION OF MY RIGHTS AND ALL OF THEM, NOT THE SELF-SERVING LIMITED MENU THAT THE N.J.E.A. PROVIDES.

IF YOU WANT TO DISCUSS THE CORRECT COMPLAINT WITH THE CORRECT PLAINTIFF'S POSITION THAT IS FINE, BUT I AM NOT A ATTORNEY. AND CANNOT GIVE LEGAL

EXHIBIT E

ADVICE TO YOU.

THE N.J.E.A. WILL CONTINUE TO BEAR THE RESPONSIBILITY FOR LEGAL ADVICE IN THIS MATTER. THE COSTS OF DEFENDING MY RIGHTS GROW BY THE DAY. THE COMPLETE LACK OF FILINGS ON RETALIATION, INTIMIDATION, & COERCION INDICATE THAT SOMEONE IS BEING PROTECTED HERE AND IT HASN'T BEEN ME.

IF YOU CHOOSE TO FILE IN FEDERAL COURT WITHOUT MY PERMISSION, AND OBSTRUCT MY RIGHTS I CANNOT STOP YOU. DOCUMENTS REGARDING CRIMINAL VIOLATIONS HAVE BEEN IGNORED, MY DESIRE TO PUT A STOP TO THIS 10 YEARS OF VIOLATION OF MY RIGHTS HAS BEEN IGNORED, AND I EXPECT LITTLE ELSE FROM THE N.J.E.A.

Edward Bonard.

95043700/19

9504370780

[redacted]LIN, ROSEN, CAVANAGH & U[redacted]
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
268 NORWOOD AVENUE
P.O. BOX 38
WEST LONG BRANCH, N.J. 07764
(908) 229-3200
TELEFAX # (908) 571-8741

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ROBERT P. McELVITT
SHARON LYNCH HORTON
N.J. & N.Y. BARS
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
N.J. & PA. BARS

April 19, 1994

Mr. Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718

Re: *Renaud v. Edison Township Board of Education*
Our File No. 26089

Dear Mr. Renaud:

Your facsimile letter was transmitted to this office at 4:36 p.m. on Friday, April 15, 1994. It is apparent from your letter that you received our letter of over a week ago. We had urged you therein to telephone us but you did not. By the time you faxed your last letter to us, thirty (30) minutes prior to the close of business on Friday, the complaint in the above named matter had already been sent to the Court for filing. Enclosed is a copy of that complaint, which contains revisions you suggested. In any event, in your letter you never explicitly stated whether you were directing us not to file the prepared complaint, an issue which could have been easily addressed had you just telephoned us in a timely fashion.

For the reasons that you recently advanced both in the March 17th meeting and your subsequent two letters, and your refusal to orally communicate with us about your case, as well as your filing on your own of administrative claim of discrimination, this firm cannot for ethical reasons represent you in this litigation or in any other forum, including the Departments of Labor and Education. Accordingly, we intend to bring a motion to be relieved as your counsel in the pending federal litigation and before the Department of Labor. As we have previously stated, we will gladly cooperate in transferring your file to any attorney of your choosing. Should you choose to proceed *pro se*, we will also cooperate with you in any way possible to effect an orderly transition of the file. Should you wish to withdraw the complaint, you can do so by writing to the Clerk of the Court, William T. Walsh, at the United States District Courthouse and P.O. Building, Newark, New Jersey 07102, referring to the complaint number. The Court Rules require that the complaint be served within 120 days of its

EX-F G-49

filing. We will not effect service of the complaint unless you direct us to do so in writing within the next ten (10) days. We will also delay the filing of our motion to be relieved for the next ten (10) days to give you an opportunity to decide whether you wish to withdraw the complaint or substitute other counsel or yourself in the action.

As you know, the State Department of Labor sent a notice of hearing concerning your unemployment benefits which we both received last week. As you further know, I sent you a copy of the notice which I received, advising you that neither Mr. Cavanagh nor I were available to attend on such short notice. I advised you that, unless you objected, we would seek an adjournment of the meeting. While this letter was being processed, you telephoned this office for the first time in over a month and left a message with my secretary that you agreed that the unemployment hearing should be adjourned. She then placed your call into Mr. Cavanagh and myself and I advised you that I had spoken to Mr. Ronald Gitter of the State Department of Labor this morning and told him of our unavailability on short notice. I told you that Mr. Gitter instructed me to telephone him tomorrow, April 19, 1994, and advise him if you would go alone. He said he would otherwise consider an adjournment. After confirming your desire to adjourn the hearing, I began to tell you of the status of the District Court complaint and my questions about your April 15th letter. You apparently hung up the telephone as a recording advised me to hang up and dial again. It appears you do not wish to discuss the substance of your case with us. To the same effect, we have no knowledge of the case which you tell us you have since brought before the Commissioner of Education.

We have had no communication with the NJEA concerning any of the above stated matters. You should contact them immediately regarding their providing further representation for you in any pending cases.

Very truly yours,

SHARON LYNCH NORTON

SLN/mmc
CERTIFIED MAIL
R.R.R. #P 317 780 430
cc: via regular mail

950437002/82

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Edward Renaud
508 Fox Avenue
Belfad, NJ. 07718

4a. Article Number

P 317 780 430

4b. Service Type

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8. Addressee's Address (Only if requested and fee paid)

5. Signature (Addressee)

6. Signature (Agent)

PS Form 3811, November 1990 * U.S. GPO: 1991—287-865 DOMESTIC RETURN RECEIPT

P 317 780 430

*State of New Jersey*
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
RICHARD J. HUGHES JUSTICE COMPLEX
25 MARKET STREET
CN 112
TRENTON, NJ 08625-0112

DEBORAH T. PORITZ
ATTORNEY GENERAL

[redacted]
DIRECTOR

(609) 292-8150

July 25, 1994

Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718

Dear Mr. Renaud:

The Attorney General has received your letter and referred it to me for a reply. I have reviewed the voluminous documentation that you included with your letter and I must advise you that the Attorney General does not conduct investigations nor bring charges of the type you seek.

From your letter it is clear that you have done many things in your attempt to vindicate what you allege has been a violation of your civil rights. You have had at least three lawyers handling your complaints. There have been a petition filed pursuant to education laws, a federal court case, a Division on Civil Rights complaint, a hearing before the Department of Labor, a complaint with the New Jersey Education Association, a complaint regarding your attorney, a complaint to and intercession by your congressman, an E.E.O.C. complaint, a complaint filed in the Law Division of Superior Court, and apparently you have even filed a complaint naming your doctor. Although the Attorney General does not institute suit on behalf of individuals who allege that their civil rights have been violated, it appear that you have been vigilant in protecting what you conceive to be your civil rights.

Nonetheless, if you believe that the events that you described in your letter may also constitute criminal violations, the appropriate person to consider your complaint in that regard is the County Prosecutor.

LAPS

*New Jersey Is An Equal Opportunity Employer*

G-5

950437007384

I hope that this information will be of assistance to you.

Very truly yours,

DEBORAH T. PORITZ
ATTORNEY GENERAL OF NEW JERSEY

By: _____
Arlene Goldfus Lutz
Deputy Attorney General

c: Regina Garb
John Bender, D.A.G.
David Powers, D.A.G.

950437007385

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ASBURY PARK PRESS May 26 1992

# 6th District's first contest a busy race

## GOP offers wide choice

By ART WEISSMAN
PRESS STATEHOUSE BUREAU

TRENTON — Republicans trying to decide whom to support for Congress in the newly redrawn 6th District can choose from a varied array of candidates in the party's June 2 primary.

State Sen. Joseph M. Kyrillos Jr. of Middletown Township stresses that he is the only candidate who has served in elective office, he is also the only one with a record of voting against tax increases.

### REPUBLICANS

Grace C. Applegate of Old Bridge Township, a former state assistant labor commissioner, believes voters want someone who's had life experience.

Paul Dimeikuyk, a Perth Amboy real estate marketer, is a conservative who believes government needs a "cosmos inspector" to "stop special interests feeding off the trough."

And James R. Sheridan, a longtime Monmouth party chairman in Edison Township, proudly concedes to a sense of frustration with government that "I'm a politician."

Although Applegate is airing a few radio commercials condemning Kyrillos as a career politician, the campaign has been generally free of rancor, especially when compared to the bickering among the district's Democratic candidates.

"I'm surprised it's been as quiet as it's been," said Kyrillos, who many believe is leading in the race and who has the support of most Monmouth County and several Middlesex County GOP officials.

Please see GOP, page A7

## Democrats bickering

By ART WEISSMAN
PRESS STATEHOUSE BUREAU

TRENTON — Rep. Frank J. Pallone Jr. and state Assemblyman Robert G. Smith seem to be intent on playing the age-old game of "can you top this."

In many ways, the positions of the two elected officials are similar: They agree on a wide range of issues, from a woman's right to an abortion to the need for federal Share preservation funds.

Yet, in their race for the Demo-

### DEMOCRATS

cratic nomination in the 6th Congressional District in Monmouth and Middlesex counties, the two lawyers have repeatedly aired to top each other with endorsements, accusations and issue positions. Although both advocate universal health care, they argue about who was first to announce his support.

Neither has delivered a knockout blow. And most Democrats think the race — which also includes Jeffrey Gorman of New Brunswick and Barbara Jensen of South River — is too close to call.

Pallone, a Long Branch resident seeking his third full term in Congress, and Smith, an assemblyman from Piscataway Township, are regarded as the front-runners. But many Democrats — including the two men's own supporters — dislike their bickering.

"People are sick of the rhetoric," said Monmouth County Democratic chairman Victor V. Scudery, who is backing Pallone.

All four candidates portray themselves as political outsiders, hoping to gain favor with frustrated voters. In their low-budget campaigns, Jensen and Gorman argue they can better understand the concerns of working people.

"I owe no favors to any interest groups, it costs me $20 to bounce a check and I have never voted to give myself a raise," said Gorman a systems analyst with no political experience. "I am the person who most represents the average person in this district."

Jensen, a former school bus driver who is a substitute teacher is running because "I wanted people to have an option, that there are people out there like them."

"The average voter doesn't feel they have anyone out there who represents them, and they're not going to vote," she said.

Pallone and Smith, trying to distance themselves from the anti-government mood, accuse each other of being a "party boss."

Pallone, whose former district was torn apart in March by the state's redistricting commission, contends he was targeted by a "cabal" of Democratic leaders who tried to force him out of office because of his political independence.

Smith, who stepped down last month as Middlesex County's Democratic chairman, says "I represent change. I want to shake up things in Congress."

"If congressmen like Frank Pallone aren't responsible for the mess we're in, who is?" asks one of Smith's radio commercials.

Smith and Pallone — each of whom says he's ahead — agree that a high percentage of voters are undecided. Democratic leaders believe that county loyalties, rather than issues or personalities, could be decisive in the June 2 balloting.

Both counties had their own district before Pallone's was split among four others. Most Monmouth coastal and Bayshore communities were merged into a new district with parts of central and southeastern Middlesex County now represented by Democrat Bernard J. Dwyer. Dwyer is retiring instead of facing Pallone in the primary.

Monmouth and Middlesex officials, who had their own local congressman under the former redistricting scheme, want the same now.

Pallone is endorsed by the Monmouth County Democratic Party, while Smith is supported by the Middlesex organization. Middlesex Democrats outnumber those Monmouth counterparts in the new district by a 65-to-35 margin.

"We have to do very well in Monmouth County to overcome the huge number of Democrats in Middlesex," Scudery said. "We have to win by 75 percent in Monmouth County for Congressman Pallone to win."

Pallone thinks his record in Congress, combined with the wide publicity he received during the four-month losing battle to save his district, will put him over the top.

"People now me as someone who was willing to stand up for the Shore and for what I believed in," Pallone said. "People understand I was out there fighting."

Each of the candidates dislikes the district boundaries and vows to represent the two counties equally. But Jensen said the reshaping of the district "opened an opportunity for somebody who was new and not part of the establishment."

Referring to Smith and Pallone, she noted, "the information, the knowledge, the experience the two gentlemen have isn't something that can't be acquired." Despite her lack of experience, Jensen asserts she is "freshly knowledgeable," after receiving a master's degree in public administration last year.

"Like today's politicians, I know I don't have all the answers. Unlike today's politicians, I look to the future for these answers, not the past," said Gorman, who is pursuing a master's degree. "As a systems analyst, I solve problems. I don't create them."

The candidates agree on several major issues, including the need for cuts in defense spending and creation of universal health care. All four are abortion-rights advocates.

Pallone, though, is alone in his opposition to a federal transportation bill that provided $5.65 billion in aid to the state; he voted against it because of a gasoline tax extension.

There are also differences on education reform. Gorman, for example, believes teen-agers who drop out should not receive drivers' licenses until age 18, and wants to expand school lunch programs. "If students are hungry, students are not going to work very well," he said.

Jensen dismissed the belief that everyone should be guaranteed a college education, and said the biggest problem in education is the breakdown of the family.

"Everybody in America wants to blame everything on the educational system. It's the family system that has really gone awry," she said.

Jensen and Smith favor vocational education, with Smith proposing a national apprenticeship program for high school students. "When they graduate, they are immediately employable," he explained.

Pallone, who favors consideration of national standards for high school students, has been endorsed by a variety of interest groups, including the United Auto Workers, the Sierra Club, and the National Abortion Rights Action League.

From page A1



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G-54

# Pallone, 1 other N.J. congressman have campaign debts

Asbury Park Press Thursday, Feb. 16, 1995 A13

THE ASSOCIATED PRESS

WASHINGTON — Rep. William Martini is the only one of New Jersey's three freshmen Republican congressmen to carry a campaign debt from last fall into the new year.

Reps. Frank LoBiondo and Rodney P. Frelinghuysen, who won much easier races last November, already have a lot of money saved up for their next campaigns, according to year-end campaign finance reports.

The only other New Jersey congressman beside Martini to end 1994 owing money was Democratic Rep. Frank J. Pallone Jr. The four-term lawmaker's campaign committee had $3,604 in the bank, was owed another $5,566, and owed $32,556 to others.

Martini, who represents parts of Passaic and Essex counties, has been busy trying to chip away at the $42,955 still owed from his narrow victory over first-term incumbent Democrat Herb Klein. As of Dec. 31, Martini's campaign had $7,316 available.

Martini also loaned his campaign $8,000 on Dec. 29, raising his loan amount to $35,000 for the year.

Martini spokesman Beau Phillips said the congressman had a fund-raiser attended by about 300 people last weekend in Paterson, but has not set a timetable for when the campaign returns to the black.

"It was a very difficult race and that's also reflected by the fact that his opponent ended the race in debt, even ore so," Phillips said.

For all of 1994, Klein spent $937,000 and Martini spent $838,000 in what was the most expensive of the state's 13 House races.

Klein, who said he won't recover the $526,000 remaining in personal loans taken out for his 1992 victory, ended 1994 with an $18,258 shortfall and owing a $50,000 personally guaranteed campaign loan from Valley National Bank.

Neither LoBiondo nor Frelinghuysen had to unseat an incumbent. Each defeated less well-funded and less well-known Democrats to win seats left open by retirement.

LoBiondo has $174,327 left over after spending $730,458; and Frelinghuysen has $170,530 after spending $237,978.

The rest of the delegation ended the year with the following amounts in the bank: Democrat Robert E. Andrews, $33,899; Republican H. James Saxton, $535,075; Republican Christopher H. Smith, $59,405; Republican Marge S. Roukema, $30,296 and owing $8,666; Republican Robert D. Franks, $174,124 and owing $500; Democrat Robert G. Torricelli, $1.29 million; Democrat Donald M. Payne, $303,146; Republican Richard A. Zimmer, $488,554 and owing $8,829; and Democrat Robert Menendez, $160,929.

On the Senate side, Democrat Bill Bradley, who is up for re-election in 1996, has $248,804 with a major New Jersey fund-raiser scheduled next month.

Democrat Frank R. Lautenberg, who spent nearly $6.4 million last year to beat Republican Garabed "Chuck" Haytaian last November, has $65,843 in his committee's till.

Still owed by Lautenberg's committee is $758,342, including $750,000 in a personally guaranteed bank loan.

The committee for Haytaian, the state Assembly speaker, as of Dec. 31 had $139.27, was owed $4,815 and owes $17,602. He spent just less than $5 million last year.

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State of New Jersey
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION ON CIVIL RIGHTS
CN 090
TRENTON, NJ 08625-0090

DEBORAH T. PORITZ
ATTORNEY GENERAL

C. GREGORY STEWART
DIRECTOR

ADDRESS REPLY TO:
DIVISION ON CIVIL RIGHTS
CN 090
TRENTON, NJ 08625-0090

February 22, 1995

Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Re: RENAUD vs. EDISON TOWNSHIP BD. OF ED.
Docket Number: EM05HE-38105-H

Dear Mr. Renaud:

Please be advised that the above referenced matter has been assigned to DARREN J. BOLDEN for investigation.

You are requested to appear and participate in a Fact Finding Conference scheduled for March 3, 1995 at 9:30 a.m., at the Regional office located at 383 West State Street, Trenton, New Jersey 08625.

The Fact Finding Conference is an investigative forum intended to define and clarify the issues, to determine which elements are undisputed, to obtain evidence and to ascertain whether there is a basis for resolution of the complaint. Although it is not necessary at this stage of the investigation, you may be accompanied by a lawyer. You may not send a substitute for yourself or bring persons not requested without permission from the Investigator assigned to this complaint.

Complainants who retain an attorney for representation are to inform their representative that the Division on Civil Rights requires a Notice of Appearance to be submitted to the office handling the complaint. Failure to comply with this requirement will adversely affect your attorney's ability to effectively represent your interest before this Agency.

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6-56

Be reminded, the Fact Finding Conference has been tentatively scheduled, and whether or not it actually transpires depends upon the Answer and supporting documentation we receive from the Respondent, and your ability to refute same. The Division is under no obligation to conduct a Fact Finding Conference, and if there are no material facts to dispute, the Fact Finding Conference will not be conducted.

If during the conference or at any time before the conference, the parties desire to settle this complaint on terms which are mutually agreeable, the Division will assist the parties in attaining such a settlement. If the parties arrive at such a settlement, the Division will not issue a determination on the merits of the complaint.

Complainant's failure to attend a scheduled conference or to cooperate in the scheduling of a Conference may result in dismissal of the complaint. Complainant has an obligation to keep the Division informed of any changes in address or telephone number and any prolonged absence from the current address.

**IN FURTHER CORRESPONDENCE REGARDING THIS MATTER, PLEASE USE THE DOCKET NUMBER SET FORTH IN THE CAPTION. INQUIRIES SHOULD BE DIRECTED TO: DARREN J. BOLDEN, INVESTIGATOR, TELEPHONE NUMBER (609) 984-3059.**

Thank you for your prompt attention to this matter.

Very truly yours,

Atley R. Tyler
Regional Manager

ART:DJB:kr/C020
Cert. Mail # Z 754 339 134

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CHAMLIN, ROSEN, CAVANAGH & ULIANO
A Professional Corporation
268 Norwood Avenue
P.O. Box 38
West Long Branch, New Jersey 07764
(908) 229-3200
BY: SHARON LYNCH NORTON, ESQ. (6030)

ATTORNEYS FOR PLAINTIFF EDWARD RENAUD

**UNITED STATES DISTRICT COURT**
**DISTRICT OF NEW JERSEY**

| | |
|---|---|
| EDWARD RENAUD,<br><br>Plaintiff,<br><br>v.<br><br>EDISON TOWNSHIP BOARD OF EDUCATION, LORENE MOORE, JOSEPH KRESKEY and DONALD FLOR,<br><br>Defendants. | Civil Action No.<br><br>**COMPLAINT** |

**PRELIMINARY STATEMENT**

(1) This is an action for employment discrimination brought to secure relief, legal and equitable, for discrimination in violation of the Americans With Disabilities Act, 42 U.S.C. section 12101, *et seq.*

(2) Plaintiff also claims violations of state law by way of a violation of the New Jersey Law Against Discrimination, breach of implied contract, violation of public policy and intentional and negligent infliction of emotional distress, which arose out of the same core of operative facts and involve the same parties.

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**JURISDICTION AND VENUE**

(3) This Court has subject matter jurisdiction over this action pursuant to section 107(a) of the Americans With Disabilities Act of 1990, 42 U.S.C. section 121117(a), adopting by reference sections 706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, 42 U.S.C. sections 2000 e-5 (f)(1) and (3); pursuant to 28 U.S.C. section 1331 and 1343; and pursuant to its pendant jurisdiction claims brought under the laws of the State of New Jersey.

(4) The employment practices hereafter alleged to be unlawful were committed in the District of New Jersey.

**PROCEDURAL REQUIREMENTS**

(5) On or about February 22, 1993, plaintiff filed a charge of discrimination with the Equal Employment Opportunity Commission ("EEOC"). The charges were filed within three hundred (300) days after one or more of the alleged unlawful employment practices in violation of 42 U.S.C. section 2000 e-5 had occurred.

(6) On or about January 13, 1994, the EEOC issued the plaintiff a Notice of Right to Sue. Plaintiff filed the complaint within 90 days after the date on which he received the Notice of Right to Sue.

**PARTIES**

(7) Plaintiff Edward Renaud is and was at all times material hereto a citizen of the United States and resident of Belford, New Jersey.

950437007/91

(8) At all relevant times herein, the defendant, Edison Township Board of Education is a governmental entity in the State of New Jersey and has continuously had and does now have at least twenty-five (25) employees and is an employer within the meaning of the Americans With Disabilities Act, section 101(2), 42 U.S.C. section 12111(2).

(9) At all relevant times, the defendant Joseph Kreskey was an agent of the Edison Township Board of Education within the meaning of section 101(5)(A) of the Americans With Disabilities Act, 42 U.S.C. section 12115(A). His title was Superintendent of Schools.

(10) At all relevant times herein, the defendant Lorene Moore was an agent of the Edison Township Board of Education within the meaning of section 101(5)(A) of the Americans With Disabilities Act, 42 U.S.C. section 12115(A). Her title was Director of Personnel.

(11) At all relevant times, the defendant Donald Flor was an agent of the Edison Township Board of Education within the meaning of section 101(5)(A) of the Americans With Disabilities Act, 42 U.S.C. section 12115(A). His title was Industrial Arts Supervisor.

(12) At all relevant times herein, defendants Kreskey, Moore and Flor acted individually and as agents of defendant Edison Township Board of Education and under color of State law to deprive plaintiff of his rights.

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## STATEMENT OF FACTS

(13) Plaintiff is a tenured industrial arts teacher employed by the Edison Township Board of Education. As of August, 1992, he had been employed by the Edison Township Board of Education for eighteen (18) years.

(14) In 1984, plaintiff was diagnosed by a neurologist with narcolepsy, sleep apnea, severe sleep fragmentation and periodic leg movements. These four conditions are all sleep disorders that require plaintiff to take naps at regular intervals in order to avoid automatic behavior, which is, in essence, being asleep with your eyes open. In addition, any change in plaintiff's necessary schedule and environment with new courses would create stress which plaintiff's neurologist found would aggravate his medical condition. Plaintiff's physician reported that narcolepsy is a medical condition that results in a disability.

(15) Upon learning of his medical condition and disability, plaintiff immediately notified defendant Board of Education through his immediate supervisors. Medical documentation of his disability was placed in his personnel file.

(16) In addition, plaintiff requested that his disability be reasonably accommodated. From 1984 to September, 1992, when ordinary scheduling did not accommodate his disability, plaintiff's department chairman prepared plaintiff's teaching schedule to accommodate his disability, to wit: plaintiff was consistently assigned a High School Industrial Arts curriculum to avoid a change in material and environment which would adversely affect his disability or given adequate time to learn any new

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curriculum assigned; and plaintiff's classes were scheduled with a 45-minute break (other than lunch break) after teaching no more than three classes in order that he may sleep. In this way, plaintiff's disability was effectively accommodated for eight (8) years until September, 1992.

(17) In June, 1991, the then superintendent of schools who had always accommodated plaintiff's handicap retired and was replaced by defendant Kreskey.

(18) In April, 1992, plaintiff received a Reduction In Force ("RIF") letter from the defendant Board that a position was not available for him in the Fall, 1992.

(19) Anticipating a reappointment from the RIF list, as had been the case years prior, plaintiff in June, July and August made repeated statements of Donald Flor, who was the Industrial Arts Supervisor, as well as John Coe, the Industrial Arts Chairman who had previously arranged the accommodating assignment, that plaintiff would require accommodation in any position and that he remain in his High School Industrial Arts position which would accommodate his disability as to courses taught and class schedules. In previous years plaintiff had clearly stated that one free period at Middle School would deny accommodation.

(20) On or about August 3, 1992, defendant Donald Flor told plaintiff that plaintiff would be transferred to a position in the Middle School to teach courses he had never taught before and with a schedule that provided only one free period. Plaintiff suggested to Mr. Flor that the Middle School position be given to

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the teacher who was newly assigned to teach what had previously been plaintiff's assignment, as an accommodation to plaintiff's disability. Indeed, that person was uncertified. Mr. Flor said he would "fight that" and that if plaintiff could not do the job, the school board would force him to retire on disability.

(21) On August 11, 1992, plaintiff received a letter from defendant Lorene W. Moore, then Edison Township's Director of Personnel, reappointing plaintiff from the RIF list. In that letter, she listed plaintiff's assignment as a substitute position in the Middle School, as defendant Flor had previously indicated, hiring out of correct line of seniority.

(22) On or about August 11 or 12, 1992, plaintiff telephoned defendant Moore and questioned her about the position to which he had been assigned. Defendant Moore informed him that it was a full pay position, but that there was no seniority or pension rights. Plaintiff told defendant Moore, in any event, he renewed his request for reasonable accommodation for his disability. She stated that the Board did not have to grant reasonable accommodation, that rehiring plaintiff was accommodation enough. She also said that she did not know that he was disabled and that there was nothing to that effect in his file. Plaintiff informed her that to the contrary medical documentation was in his file since September, 1984 and that he had been accommodated since that time. Defendant Moore then demanded plaintiff write a letter informing the Board of his disability and requesting reasonable accommodation.

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(23) On or about August 13, 1992, plaintiff wrote a letter to defendant Moore accepting the position as an *Industrial Arts* teacher and further stated his disability and requested a meeting to arrange a reasonable accommodation prior to the beginning of the school year.

(24) On or about August 17, 1992, John Coe, Industrial Arts department head, arranged a schedule for plaintiff at the High School which would accommodate his disability; Mr. Flor would not consider it because he said it was too much trouble.

(25) On or about August 26, 1992, a meeting was scheduled with defendant Flor for Friday, August 28, 1992. On that date, plaintiff arrived for the meeting only to be told that defendant Flor was out for the day.

(26) On September 1, 1992, plaintiff reported to the Middle School to which he had been assigned since defendant Moore refused to accommodate his disability. He was given a schedule for a curriculum which he had not previously taught. In addition, outside of a 26-minute lunch break, plaintiff would have no period off until the end of the day. Plaintiff could not use the lunch period to sleep, especially since he is a diabetic and must use the lunch period for eating. The principal of the Middle School told plaintiff he knew nothing about the accommodation and just wanted to know if he was using sick or personal days.

(27) On September 2,.1992, plaintiff's neurologist, June Fry, M.D., sent a letter via fax to defendant Moore which is attached hereto as Exhibit A. Pursuant to his doctor's direction

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which insisted he not work without accommodation, plaintiff told the principal of the Middle School that he would be unable to teach the assigned schedule since it did not accommodate his disability.

(28) On September 8, 1992, plaintiff met with defendants Moore and Flor, accompanied by his Union President. On or about August 17, 1992, John Coe arranged a schedule at the high school with accommodation. Mr. Flor refused to consider it, saying it would be too much trouble. Defendant Moore said that she would not be held to "time line" in regard to her decision on accommodation and she alone would decide what accommodation would be made, but would eventually come up with a schedule to accommodate plaintiff. Plaintiff restated his request to be returned to the high school position with the medically required sleep intervals. He told defendant Moore that Middle School would not work out and proposed possible solutions.

(29) On or about September 17, 1992, plaintiff received a letter from defendant Moore setting out a second schedule. This second schedule was still a Middle School program without the required sleep intervals, combining "lunch/rest period." It also reduced plaintiff's pay by about $12,000 in violation of *N.J.S.A.* 18A:6-10.

(30) Plaintiff was never offered at that time his previous accommodation or any other accommodation, even though the Chairman of the Industrial Arts program at the high school said that it could be done.

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(31) Plaintiff continued to make requests for reasonable accommodation, individually, as well as through counsel. Repeated attempts to discuss accommodation resulted in the reassertion that the Middle School program was the only program allowed. However, while denying the requested accommodation, in January, 1993, defendant Moore wrote to plaintiff and said, "Please be aware that the Board of Education is very interested in resolving this dilemma. I reiterate that your schedule will be accommodated in any manner you deem necessary. . ." Despite this representation, plaintiff was not offered a reasonable accommodation for the 1992-1993 school year.

(32) In April, 1993, plaintiff received a RIF for the 1993-1994 school year, using an improper seniority list. As in the previous year, he subsequently received a reinstatement letter for the coming school year.

(33) Throughout 1993, plaintiff individually and through counsel renewed the repeated requests for accommodation directly to defendant Kreskey. None was provided. Plaintiff remained out of the classroom for the remainder of the 1993 school year, continuing suspension without pay or due process.

(34) After the reinstatement letter was issued, plaintiff again requested accommodation, having had no income for ten of the previous twelve months. Then in October, 1993, defendants provided plaintiff with a schedule in the high school which accommodates his sleep intervals. It was prepared by Department Head John Coe and was the same type of schedule which had reasonably and successfully accommodated plaintiff for eight

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years and was the same schedule he had been requesting for over one year and was denied despite the availability of that schedule.

(35) Plaintiff is presently working in that schedule.

(36) As a direct and proximate result of defendants' unlawful conduct, plaintiff has suffered loss of earnings, mental anguish and emotional distress; humiliation and embarrassment; loss of benefits and seniority rights and other monetary damages.

**FIRST CAUSE OF ACTION**

(37) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (35) of this complaint with the same force and effect as if fully set forth herein.

(38) By the above acts, defendants have violated the Americans With Disabilities Act, 42 U.S.C. section 12101, *et seq.* by discriminating against plaintiff because of his disability by failing to reasonably accommodate his disability, in the terms, conditions and privileges of his employment.

(39) Defendants' acts were done with malice and with reckless disregard for plaintiff's federally protected civil rights.

(40) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

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**SECOND CAUSE OF ACTION**

(41) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (39) of this complaint with the same force and effect as if fully set forth herein.

(42) By the foregoing acts, defendants Board of Education, Lorene Moore, Joseph Kreskey and Donald Flor aided and abetted or attempted to aid and abet in unlawful discrimination in violation of plaintiff's rights secured by *N.J.S.A.* 10:5-12(e).

(43) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**THIRD CAUSE OF ACTION**

(44) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (42) of this complaint with the same force and effect as if fully set forth herein.

(45) By the above acts, defendants have violated the New Jersey Law Against Discrimination, *N.J.S.A.* 10:5, *et seq.* by discriminating against plaintiff because of his disability by failing to reasonably accommodate his disability, in the terms, conditions and privileges of his employment.

(46) Defendants' acts were done with malice and reckless disregard for plaintiff's rights under the New Jersey Law Against Discrimination.

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(47) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**FOURTH CAUSE OF ACTION**

(48) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (46) of this complaint with the same force and effect as if fully set forth herein.

(49) By the above acts, defendants have violated the New Jersey Administrative Code (*N.J.A.C.*) 13:13-2.5 by discriminating against plaintiff because of his disability by failing to reasonably accommodate his disability, in the terms, conditions and privileges of his employment.

(50) Defendants' acts were done with malice and reckless disregard for plaintiff's rights under the New Jersey Law Against Discrimination.

(51) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**FIFTH CAUSE OF ACTION**

(52) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (50) of this

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complaint with the same force and effect as if fully set forth herein.

(53) Defendants' actions were extreme and outrageous.

(54) By engaging in the aforesaid actions, defendants intended that plaintiff suffer severe emotional distress and mental anguish.

(55) As a result of the defendants' intentional inflection of emotional harm, plaintiff suffered extreme emotional distress and mental anguish.

**SIXTH CAUSE OF ACTION**

(56) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (54) of this complaint with the same force and effect as if fully set forth herein.

(57) Defendants knew and/or should have known that his aforesaid actions would unreasonably subject plaintiff to a risk of illness or bodily harm.

(58) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**SEVENTH CAUSE OF ACTION**

(59) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (57) of this complaint with the same force and effect as if fully set forth herein.

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(60) Defendants, as a direct result of their foregoing acts, failed in good faith regarding plaintiff's employment contract with defendant employer.

(61) Defendant Board, as a direct result of the acts of its agents breached its contract with plaintiff, thereby causing him monetary damage.

**EIGHTH CAUSE OF ACTION**

(62) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (60) of this complaint with the same force and effect as if fully set forth herein.

(63) By the foregoing acts, defendants violated the public policy of the State of New Jersey.

(64) By reasons of the actions complained of above, plaintiff suffered damages, including economic loss; time loss; physical and emotional stress; anxiety caused by lack of information, uncertainty and resultant planning difficulty; career, family and social disruption; and adjustment problems.

**NINTH CAUSE OF ACTION**

(65) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (63) of this complaint with the same force and effect as if fully set forth herein.

(66) By the foregoing acts, defendants Lorene Moore, Joseph Kreskey and Donald Flor tortiously interfered with plaintiff's contractual relations with defendant Edison Township Board of Education.

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(67) By reasons of the actions complained of above, plaintiff suffered damages, including economic loss; time loss; physical and emotional stress; anxiety caused by lack of information, uncertainty and resultant planning difficulty; career, family and social disruption; and adjustment problems.

**PRAYER FOR RELIEF**

WHEREFORE, plaintiff respectfully prays that this Court:

1. That the Court declare defendants' conduct complained of in the First Cause of Action herein to be in violation of plaintiff's rights as secured by the Americans With Disabilities Act;

2. That the Court declare defendants' conduct complained of in the Second through Ninth Causes of Action herein to be in violation of the plaintiff's rights as secured by the laws of the State of New Jersey;

3. That the Court permanently enjoin defendant Board of Education and its offices, management, personnel, employees, agents, attorneys, successors and assigns and those acting in concert therewith from any conduct violating plaintiff's rights as secured by the Americans With Disabilities Act;

4. That plaintiff be awarded compensatory damages;

5. That plaintiff be awarded punitive damages;

6. That plaintiff be awarded attorney's fees and costs incurred in prosecuting this action;

7. That plaintiff be awarded such additional and further relief as it deems just and proper; and

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8. A trial by jury is demanded.

CHAMLIN, ROSEN, CAVANAGH & ULIANO, P.C.
Attorneys for Plaintiff Edward Renaud

BY: _____
SHARON LYNCH NORTON

Dated: March 16, 1994

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PART 4 FEDERAL ACTION FILED 4/14/94
BY THE N.J.E.A ATTORNEY SHARON LYNCH NORTON

9504370006

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N.J. & N.Y. BARS
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
N.J. & PA. BARS

April 14, 1994

Clerk, United States District Court
U.S. Courthouse & P.O. Bldg.
Newark, New Jersey 07102

Re: *Renaud v. Edison Township Board of Education, et al.*
Our File No. 26089

Dear Sir:

Enclosed please find original and two copies of Summons and Complaint with Civil Cover Sheet in the above matter, together with our check in the sum of $120.00.

Kindly file same, returning the copy marked 'filed' to this office in the enclosed envelope.

Very truly yours,

SHARON LYNCH NORTON

SLN/mmc
encls.

950437007

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CIVIL ACTION NO. 94-1626

EDWARD RENAUD, :

Plaintiff, :

v. :

EDISON TOWNSHIP BOARD OF EDUCATION, et al., :

Defendants. :

ORDER OF DISMISSAL

ORIGINAL FILED
JUN 15 1994
WILLIAM T. WALSH, CLERK

Plaintiff having advised the court that he does not authorize the prosecution of this action,

IT IS this 15th day of June 1994 O R D E R E D that the complaint in this action is dismissed without prejudice.

DICKINSON R. DEBEVOISE
U.S.D.J.

ENTERED
6/16/94

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JS 44
(Rev. 07/89)

# CIVIL COVER SHEET

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EDWARD RENAUD

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Monmouth
(EXCEPT IN U.S. PLAINTIFF CASES)

## DEFENDANTS

EDISON TOWNSHIP BOARD OF EDUCATION, LORENE MOORE, JOSEPH KRESKEY and DONALD FLOR

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT Middlesex
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Sharon Lynch, Norton, Esq.
Chamlin, Rosen, Cavanagh & Uliano
268 Norwood Ave., W. Long Branch, NJ
07764 (908) 229-3200

ATTORNEYS (IF KNOWN)

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- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
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- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

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| | PTF | DEF | | PTF | DEF |
|---|---|---|---|---|---|
| Citizen of This State | X ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business in This State | ☐ 4 | X ☐ 4 |
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DEMAND $ $2,000,000

Check YES only if demanded in complaint
JURY DEMAND: ☒ YES ☐ NO

## VIII. RELATED CASE(S) IF ANY (See instructions)

JUDGE _____ DOCKET NUMBER _____

DATE 4/14/94

SIGNATURE OF ATTORNEY OF RECORD /s/ Sharon Lynch Norton

UNITED STATES DISTRICT COURT

# United States District Court

DISTRICT OF NEW JERSEY

EDWARD RENAUD,

**SUMMONS IN A CIVIL ACTION**

V.

CASE NUMBER:

EDISON TOWNSHIP BOARD OF EDUCATION, LORENE MOORE, JOSEPH KRESKEY and DONALD FLOR,

TO: (Name and Address of Defendant) Above named defendants

YOU ARE HEREBY SUMMONED and required to file with the Clerk of this Court and serve upon

PLAINTIFF'S ATTORNEY (name and address)

Sharon Lynch Norton, Esq., Chamlin, Rosen, Cavanagh & Uliano, 268 Norwood Avenue, West Long Branch, New Jersey 07764

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

CLERK

DATE

BY DEPUTY CLERK

9504370-3110

AO 440 (Rev. 1/90) Summons in a Civil Action

# United States District Court

DISTRICT OF NEW JERSEY

EDWARD RENAUD,

**SUMMONS IN A CIVIL ACTION**

V.

CASE NUMBER: 94-1626 (ORD)

EDISON TOWNSHIP BOARD OF EDUCATION, LORENE MOORE, JOSEPH KRESKEY and DONALD FLOR,

TO: (Name and Address of Defendant) Above named defendants

**YOU ARE HEREBY SUMMONED** and required to file with the Clerk of this Court and serve upon

**PLAINTIFF'S ATTORNEY** (name and address)

Sharon Lynch Norton, Esq., Chamlin, Rosen, Cavanagh & Uliano, 268 Norwood Avenue, West Long Branch, New Jersey 07764

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**WILLIAM T. WALSH**

CLERK

8/18/94

DATE

DIANNE C. RICHARDS

BY DEPUTY CLERK

0504370038111

FILED

APR 14 1994

AT 8:30 M
WILLIAM T. WALSH
CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK , NEW JERSEY 07101-0419

General Rule 8b of this court requires name of judge on all pleadings filed with this office.

| | | |
|---|---|---|
| RENAUD | Plaintiff(s) | Civil Action No. 2:94cv01626 |
| v. | | NOTICE OF ALLOCATION and ASSIGNMENT |
| EDISON TOWNSHIP BRD | Defendant(s) | |

Pursuant to Rule 11 of the General Rules of this Court, I have allocated the above entitled matter to NEWARK.

Please file all pleadings and make all motions returnable thereto.

This action has been assigned to the Hon. Dickinson R. Debevoise United States District Judge for trial. You are also notified that all discovery and other non-dispositive matters will be assigned to United States Magistrate-Judge G. Donald Haneke.

All parties are hereby notified that you may consent to arbitration in this matter in accordance with General Rule 47C. All parties must voluntarily consent to arbitration.

Also, you are further notified that all parties in a civil case may consent to conduct all proceedings, including trial and the entry of a final judgment, before the full-time United States Magistrate-Judge in accordance with the provision of Title 28 U.S.C. Code & 636(c).

WILLIAM T. WALSH
CLERK

Dianne C. Richards

by: DIANNE C. RICHARDS
Deputy Clerk

Date: 04/14/94

The Court has directed that counsel be informed that there will be STRICT ENFORCEMENT OF GENERAL RULE 15 of the local rules of this Court (completion of discovery), and sanctions may be imposed for failure to comply with the rules and orders entered pursuant thereto; including dismissal of the action and suppression of the defense.

950437001312

AO 440 (Rev. 10/93) Summons in a Civil Action

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DISTRICT OF NEW JERSEY

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PLAINTIFF'S ATTORNEY (name and address)

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WILLIAM T. WALSH

CLERK

2/10/94

DATE

DIANNE C. RICHARDS

BY DEPUTY CLERK

950437003813

FILED

APR 14 1994

AT 8:30 M
WILLIAM T. WALSH
CLERK

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DISTRICT OF NEW JERSEY
NEWARK , NEW JERSEY 07101-0419

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950437003114

AO82 SWEDA
(Rev. 4/91)

RECEIPT FOR PAYMENT
UNITED STATES DISTRICT COURT
for the
DISTRICT OF NEW JERSEY
at Newark

189853

| Fund | |
|---|---|
| 6855XX | Deposit Funds |
| 604700 | Registry Funds |
| | General and Special Funds |
| 506800 | Immigration Fees |
| 085000 | Attorney Admission Fees |
| 086900 | Filing Fees |
| 322340 | Sale of Publications |
| 322350 | Copy Fees |
| 322360 | Miscellaneous Fees |
| 143500 | Interest |
| 322380 | Recoveries of Court Costs |
| 322386 | Restitution to U.S. Government |
| 121000 | Conscience Fund |
| 129900 | Gifts |
| 504100 | Crime Victims Fund |
| 613300 | Unclaimed Monies |
| 510000 | Filings Spec. Acct. |
| 510100 | Registry Admin. Acct. |

CASE REFERENCE: 94-1626 (AJL) 120.00

RECEIVED FROM Chamlin, Rosen
P.O. Box 38
West Long Branch, NJ.
07764

DEPUTY CLERK Jan 4/15/94

Checks and drafts are accepted subject to collection and full credit will only be given when the check or draft has been accepted by the financial institution on which it was drawn.

WHITE: ORIGINAL
YELLOW: DUPLICATE
PINK: TRIPLICATE

9504370315

JS 44
(Rev. 07/89)

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SIGNATURE OF ATTORNEY OF RECORD /s/ Sharon Lynch Norton

UNITED STATES DISTRICT COURT

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RECEIVED

APR 14 1994

AT 8:30 1:25 PM
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- ☐ 871 IRS—Third Party 26 USC 7609

**OTHER STATUTES**
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce/ICC Rates/etc.
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 810 Selective Service
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 875 Customer Challenge 12 USC 3410
- ☐ 891 Agricultural Acts
- ☐ 892 Economic Stabilization Act
- ☐ 893 Environmental Matters
- ☐ 894 Energy Allocation Act
- ☐ 895 Freedom of Information Act
- ☐ 900 Appeal of Fee Determination Under Equal Access to Justice
- ☐ 950 Constitutionality of State Statutes
- ☐ 890 Other Statutory Actions

**VI. ORIGIN** (PLACE AN x IN ONE BOX ONLY)

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

**VII. REQUESTED IN COMPLAINT:** CHECK IF THIS IS A CLASS ACTION ☐ UNDER F.R.C.P. 23

**DEMAND $** $2,000,000

Check YES only if demanded in complaint
**JURY DEMAND:** ☒ YES ☐ NO

**VIII. RELATED CASE(S) IF ANY** (See instructions) JUDGE _____ DOCKET NUMBER _____

DATE 4/14/94

SIGNATURE OF ATTORNEY OF RECORD /s/ Sharon Lynch Norton

UNITED STATES DISTRICT COURT

950437/0

# United States District Court

DISTRICT OF
NEW JERSEY

EDWARD RENAUD,

**SUMMONS IN A CIVIL ACTION**

V.

CASE NUMBER:

EDISON TOWNSHIP BOARD OF EDUCATION, LORENE MOORE, JOSEPH KRESKEY and DONALD FLOR,

RECEIVED
APR 1 A 1994
AT 8:30 1:25 PM
WILLIAM T. WALSH, CLERK

TO: (Name and Address of Defendant) Above named defendants

YOU ARE HEREBY SUMMONED and required to file with the Clerk of this Court and serve upon

PLAINTIFF'S ATTORNEY (name and address)

Sharon Lynch Norton, Esq., Chamlin, Rosen, Cavanagh & Uliano, 268 Norwood Avenue, West Long Branch, New Jersey 07764

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

CLERK

DATE

BY DEPUTY CLERK

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**CHAMLIN, ROSEN, CAVANAGH & ULIANO**
**A Professional Corporation**
**268 Norwood Avenue**
**P.O. Box 38**
**West Long Branch, New Jersey 07764**
**(908) 229-3200**
**BY: SHARON LYNCH NORTON, ESQ. (6030)**

ATTORNEYS FOR PLAINTIFF EDWARD RENAUD

ORIGINAL FILED
APR 14 1995
WILLIAM T. WALSH, CLERK

**UNITED STATES DISTRICT COURT**
**DISTRICT OF NEW JERSEY**

| | |
|---|---|
| **EDWARD RENAUD,**<br><br>Plaintiff,<br><br>v.<br><br>**EDISON TOWNSHIP BOARD OF EDUCATION, LORENE MOORE, JOSEPH KRESKEY and DONALD FLOR,**<br><br>Defendants. | Civil Action No.<br><br>**COMPLAINT** |

950437008 19

**PRELIMINARY STATEMENT**

(1) This is an action for employment discrimination brought to secure relief, legal and equitable, for discrimination in violation of the Americans With Disabilities Act, 42 U.S.C. section 12101, *et seq.*

(2) Plaintiff also claims violations of state law by way of a violation of the New Jersey Law Against Discrimination, violation of *N.J.S.A.* Title 18A "School Law", breach of implied contract, violation of public policy and intentional and negligent infliction of emotional distress, which arose out of the same core of operative facts and involve the same parties.

**JURISDICTION AND VENUE**

(3) This Court has subject matter jurisdiction over this action pursuant to section 107(a) of the Americans With Disabilities Act of 1990, 42 U.S.C. section 121117(a), adopting by reference sections 706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, 42 U.S.C. sections 2000 e-5 (f)(1) and (3); pursuant to 28 U.S.C. section 1331 and 1343; and pursuant to its pendant jurisdiction claims brought under the laws of the State of New Jersey.

(4) The employment practices hereafter alleged to be unlawful were committed in the District of New Jersey.

**PROCEDURAL REQUIREMENTS**

(5) On or about February 22, 1993, plaintiff filed a charge of discrimination with the Equal Employment Opportunity Commission ("EEOC"). The charges were filed within three hundred (300) days after one or more of the alleged unlawful employment practices in violation of 42 U.S.C. section 2000 e-5 had occurred.

(6) On or about January 18, 1994, the plaintiff received a Notice of Right to Sue. Plaintiff filed the complaint within 90 days after the date on which he received the Notice of Right to Sue.

**PARTIES**

(7) Plaintiff Edward Renaud is and was at all times material hereto a citizen of the United States and resident of Belford, New Jersey.

(8) At all relevant times herein, the defendant, Edison Township Board of Education is a governmental entity in the State of New Jersey and has continuously had and does now have at least twenty-five (25) employees and is an employer within the meaning of the Americans With Disabilities Act, section 101(2), 42 U.S.C. section 12111(2).

(9) At all relevant times, the defendant Joseph Kreskey was an agent of the Edison Township Board of Education within the meaning of section 101(5)(A) of the Americans With Disabilities Act, 42 U.S.C. section 12115(A). His title was Superintendent of Schools.

(10) At all relevant times herein, the defendant Lorene Moore was an agent of the Edison Township Board of Education within the meaning of section 101(5)(A) of the Americans With Disabilities Act, 42 U.S.C. section 12115(A). Her title was Director of Personnel.

(11) At all relevant times, the defendant Donald Flor was an agent of the Edison Township Board of Education within the meaning of section 101(5)(A) of the Americans With Disabilities Act 42 U.S.C. section 12115(A). His title was Industrial Arts Supervisor.

(12) At all relevant times herein, defendants Kreskey, Moore and Flor acted individually and as agents of defendant Edison Township Board of Education and under color of State law to deprive plaintiff of his rights.

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## STATEMENT OF FACTS

(13) Plaintiff is a tenured industrial arts teacher employed by the Edison Township Board of Education. As of August, 1992, he had been employed by the Edison Township Board of Education for eighteen (18) years.

(14) In 1984, plaintiff was diagnosed by a neurologist with narcolepsy, sleep apnea, severe sleep fragmentation and periodic leg movements. These four conditions are all sleep disorders that require plaintiff to take naps at regular intervals in order to avoid automatic behavior, which is, in essence, being asleep with your eyes open. In addition, any change in plaintiff's necessary schedule and environment with new courses would create stress which plaintiff's neurologist found would aggravate his medical condition. Plaintiff's physician reported that narcolepsy is a medical condition that results in a disability.

(15) Upon demand by Mr. Flor that plaintiff supply a letter certifying his fitness to teach, plaintiff immediately supplied a letter to the defendant Board of Education stating that he had the medical condition narcolepsy and was cleared to work as long as he continued his medication, which then became unavailable through his pharmacy, as it did in 1992. Medical documentation of his disability was placed in his personnel file.

(16) In addition, plaintiff requested that his disability be reasonably accommodated. From 1984 to September, 1992, when ordinary scheduling did not accommodate his disability, plaintiff's department chairman prepared plaintiff's teaching schedule to accommodate his disability, to wit: plaintiff was

950437/00322

consistently assigned a High School teaching position to avoid a change in material and environment which would adversely affect his disability or given adequate time to learn any new curriculum assigned; and plaintiff's classes were scheduled with a 45-minute break (other than lunch break) after teaching no more than three classes in order that he may sleep. In this way, plaintiff's disability was effectively accommodated in a cost free manner for eight (8) years until September, 1992.

(17) In June, 1991, the then superintendent of schools who had always accommodated plaintiff's handicap retired and was replaced by defendant Kreskey.

(18) In April, 1992, plaintiff received a Reduction In Force ("RIF") letter from the defendant Board that a position was not available for him in the Fall, 1992.

(19) Anticipating a reappointment from the RIF list, as had been the case years prior, plaintiff in June, July and August made repeated statements of Donald Flor, who was the Industrial Arts Supervisor, as well as John Coe, the Industrial Arts Chairman who had previously arranged the accommodating assignment, that plaintiff would require accommodation in any position and that he remain in a High School Industrial Arts position which would accommodate his disability as to courses taught and class schedules. In previous years plaintiff had clearly stated that one free period at Middle School would deny accommodation.

(20) On or about August 3, 1992, defendant Donald Flor told plaintiff that plaintiff would be transferred to a position in

the Middle School to teach courses he had never taught before and with a schedule that provided only one free period. Plaintiff suggested to Mr. Flor that the Middle School position be given to the teacher who was newly assigned to teach what had previously been plaintiff's assignment, teaching metal shop; drafting portion of plaintiff's assignment would go to teacher who is either uncertified or may be a non-citizen, as an accommodation to plaintiff's disability. Indeed, that person was uncertified. Mr. Flor said he would "fight that" and that if plaintiff could not do the job, the school board would force him to retire on disability, and that the teaching schedule was 5 periods and a duty "take it or leave it."

(21) On August 11, 1992, plaintiff received a letter from defendant Lorene W. Moore, then Edison Township's Director of Personnel, reappointing plaintiff from the RIF list. In that letter, she listed plaintiff's assignment as a substitute position in the Middle School, justifying both RIF and assignment to a non-tenured without plaintiff's consent or due process, as defendant Flor had previously indicated, hiring out of correct line of seniority by at least three positions.

(22) On or about August 11 or 12, 1992, plaintiff telephoned defendant Moore and questioned her about the position to which he had been assigned. Defendant Moore informed him that it was a full pay position, but that there was no seniority or pension rights. Plaintiff told defendant Moore, in any event, he renewed his request for reasonable accommodation for his disability. She stated that the Board did not have to grant

have no period off until the end of the day. and the schedule required plaintiff to teach 6 periods during the second marking period. Plaintiff could not use the lunch period to sleep, especially since he is a diabetic and must use the lunch period for eating. The principal of the Middle School told plaintiff he knew nothing about the accommodation and just wanted to know if he was using sick or personal days. Plaintiff replied that he did not exercise control over how days were designated, that the Board of Education having failed to continue accommodation to his disability, responsibility for pay for any days he could not work should be the responsibility of the Board of Education.

(27) On September 2, 1992, plaintiff's neurologist, June Fry, M.D., sent a letter via fax to defendant Moore which is attached hereto as Exhibit A. Pursuant to his doctor's direction which insisted he not work without accommodation, plaintiff told the principal of the Middle School that he would be unable to teach the assigned schedule since it did not accommodate his disability.

(28) On September 8, 1992, plaintiff met with defendants Moore and Flor, accompanied by his Union President. On or about August 17, 1992, John Coe arranged a schedule at the high school with accommodation. Mr. Flor refused to consider it, saying it would be too much trouble. Defendant Moore said that she would not be held to "time line" in regard to her decision on accommodation and she alone would decide what accommodation would be made, but would eventually come up with a schedule to accommodate plaintiff. All input from John Gundry, Union

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President, Mr. Flor and the plaintiff regarding possible compromise and the impracticality of providing accommodation at the Middle School was ignored. Plaintiff restated his request to be returned to the high school position with the medically required sleep intervals. He told defendant Moore that Middle School would not work out and proposed possible solutions.

(29) On or about September 17, 1992, plaintiff received a letter from defendant Moore setting out a second schedule. This second schedule was still a Middle School program without the required sleep intervals, combining "lunch/rest period." It also reduced plaintiff's pay by about $12,000 in violation of *N.J.S.A.* 18A:6-10, and the schedule substantially misrepresented the actual schedule the plaintiff would be required to teach.

(30) Plaintiff was never offered at that time his previous accommodation or any other accommodation, even though the Chairman of the Industrial Arts program at the high school said that it could be done.

(31) Plaintiff continued to make requests for reasonable accommodation, individually, as well as through counsel. Repeated attempts to discuss accommodation resulted in the reassertion that the Middle School program was the only position available. However, while denying the requested accommodation, in January, 1993, defendant Moore wrote to plaintiff and said, "Please be aware that the Board of Education is very interested in resolving this dilemma. I reiterate that your schedule will be accommodated in any manner you deem necessary. . ." Despite

this representation, plaintiff was not offered a reasonable accommodation for the 1992-1993 school year.

(32) In April, 1993, plaintiff received a RIF for the 1993-1994 school year, using an improper seniority list. As in the previous year, he was subsequently rehired in June of 1993 and received a notification of that rehiring was withheld until August of 1993. The position offered was the same position that provided no accommodation to the plaintiff's disability.

(33) Throughout 1993, plaintiff individually and through counsel renewed the repeated requests for accommodation directly to defendant Kreskey. None was provided. Plaintiff remained out of the classroom for the remainder of the 1993 school year, continuing suspension without pay or due process.

(34) After the reinstatement letter was issued, plaintiff again requested accommodation, having had no income for two periods of 5 months each during the preceding 14 months. Then in October, 1993, defendants first offered a Middle School schedule that would result in a reduction in pay and violates *N.J.S.A.* 18A:6-10, which the plaintiff refused. In response the defendants then offered plaintiff with a schedule in the high school which accommodates his sleep intervals. It was prepared by Department Head John Coe and was the same type of schedule which had reasonably and successfully accommodated plaintiff for eight years and was the same schedule he had been requesting for over one year and was denied despite the availability of that schedule.

(35) Plaintiff is presently working in that schedule.

(36) As a direct and proximate result of defendants' unlawful conduct, plaintiff has suffered loss of earnings, mental anguish and emotional distress; humiliation and embarrassment; loss of benefits and seniority rights and other monetary damages.

**FIRST CAUSE OF ACTION**

(37) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (35) of this complaint with the same force and effect as if fully set forth herein.

(38) By the above acts, defendants have violated the Americans With Disabilities Act, 42 U.S.C. section 12101, *et seq.* by discriminating against plaintiff because of his disability by failing to reasonably accommodate his disability, in the terms, conditions and privileges of his employment.

(39) Defendants' acts were done with malice and with reckless disregard for plaintiff's federally protected civil rights.

(40) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**SECOND CAUSE OF ACTION**

(41) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (39) of this complaint with the same force and effect as if fully set forth herein.



950437/00328

(42) By the foregoing acts, defendants Board of Education, Lorene Moore, Joseph Kreskey and Donald Flor aided and abetted or attempted to aid and abet in unlawful discrimination in violation of plaintiff's rights secured by *N.J.S.A.* 10:5-12(e).

(43) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**THIRD CAUSE OF ACTION**

(44) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (42) of this complaint with the same force and effect as if fully set forth herein.

(45) By the above acts, defendants have violated the New Jersey Law Against Discrimination, *N.J.S.A.* 10:5, *et seq.* by discriminating against plaintiff because of his disability by failing to reasonably accommodate his disability, in the terms, conditions and privileges of his employment.

(46) Defendants' acts were done with malice and reckless disregard for plaintiff's rights under the New Jersey Law Against Discrimination.

(47) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**FOURTH CAUSE OF ACTION**

(48) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (46) of this complaint with the same force and effect as if fully set forth herein.

(49) By the above acts, defendants have violated the New Jersey Administrative Code (*N.J.A.C.*) 13:13-2.5 by discriminating against plaintiff because of his disability by failing to reasonably accommodate his disability, in the terms, conditions and privileges of his employment.

(50) Defendants' acts were done with malice and reckless disregard for plaintiff's rights under the New Jersey Law Against Discrimination.

(51) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**FIFTH CAUSE OF ACTION**

(52) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (50) of this complaint with the same force and effect as if fully set forth herein.

(53) Defendants' actions were extreme and outrageous.

(54) By engaging in the aforesaid actions, defendants intended that plaintiff suffer severe emotional distress and mental anguish.

(55) As a result of the defendants' intentional inflection of emotional harm, plaintiff suffered extreme emotional distress and mental anguish.

**SIXTH CAUSE OF ACTION**

(56) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (54) of this complaint with the same force and effect as if fully set forth herein.

(57) Defendants knew and/or should have known that his aforesaid actions would unreasonably subject plaintiff to a risk of illness or bodily harm.

(58) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**SEVENTH CAUSE OF ACTION**

(59) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (57) of this complaint with the same force and effect as if fully set forth herein.

(60) Defendants, as a direct result of their foregoing acts, failed in good faith regarding plaintiff's employment contract with defendant employer.

(61) Defendant Board, as a direct result of the acts of its agents breached its contract with plaintiff, thereby causing him monetary damage.

**EIGHTH CAUSE OF ACTION**

(62) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (60) of this complaint with the same force and effect as if fully set forth herein.

(63) By the foregoing acts, defendants violated the public policy of the State of New Jersey.

(64) By reasons of the actions complained of above, plaintiff suffered damages, including economic loss; time loss; physical and emotional stress; anxiety caused by lack of information, uncertainty and resultant planning difficulty; career, family and social disruption; and adjustment problems.

**NINTH CAUSE OF ACTION**

(65) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (63) of this complaint with the same force and effect as if fully set forth herein.

(66) By the foregoing acts, defendants Lorene Moore, Joseph Kreskey and Donald Flor tortiously interfered with plaintiff's contractual relations with defendant Edison Township Board of Education.

(67) By reasons of the actions complained of above, plaintiff suffered damages, including economic loss; time loss; physical and emotional stress; anxiety caused by lack of information, uncertainty and resultant planning difficulty; career, family and social disruption; and adjustment problems.

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**PRAYER FOR RELIEF**

**WHEREFORE, plaintiff respectfully prays that this Court:**

**1. That the Court declare defendants' conduct complained of in the First Cause of Action herein to be in violation of plaintiff's rights as secured by the Americans With Disabilities Act;**

**2. That the Court declare defendants' conduct complained of in the Second through Ninth Causes of Action herein to be in violation of the plaintiff's rights as secured by the laws of the State of New Jersey;**

**3. That the Court permanently enjoin defendant Board of Education and its offices, management, personnel, employees, agents, attorneys, successors and assigns and those acting in concert therewith from any conduct violating plaintiff's rights as secured by the Americans With Disabilities Act;**

**4. That plaintiff be awarded compensatory damages;**

**5. That plaintiff be awarded punitive damages;**

**6. That plaintiff be awarded attorney's fees and costs incurred in prosecuting this action;**

**7. That plaintiff be awarded such additional and further relief as it deems just and proper; and**

**8. A trial by jury is demanded.**

CHAMLIN, ROSEN, CAVANAGH & GLIANO, P.C.
Attorneys for Plaintiff Edward Renaud

BY: /s/ Sharon Lynch Norton
SHARON LYNCH NORTON

Dated: April 11, 1994



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**CHAMLIN, ROSEN, CAVANAGH & ULIANO**
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**268 Norwood Avenue**
**P.O. Box 38**
**West Long Branch, New Jersey 07764**
**(908) 229-3200**
**BY: SHARON LYNCH NORTON, ESQ. (6030)**

ATTORNEYS FOR PLAINTIFF EDWARD RENAUD

**UNITED STATES DISTRICT COURT**
**DISTRICT OF NEW JERSEY**

| | |
|---|---|
| **EDWARD RENAUD,**<br><br>Plaintiff,<br><br>v.<br><br>**EDISON TOWNSHIP BOARD OF EDUCATION, LORENE MOORE, JOSEPH KRESKEY and DONALD FLOR,**<br><br>Defendants. | Civil Action No.<br><br>**COMPLAINT** |

950437/00034

**PRELIMINARY STATEMENT**

(1) This is an action for employment discrimination brought to secure relief, legal and equitable, for discrimination in violation of the Americans With Disabilities Act, 42 U.S.C. section 12101, *et seq.*

(2) Plaintiff also claims violations of state law by way of a violation of the New Jersey Law Against Discrimination, violation of *N.J.S.A.* Title 18A "School Law", breach of implied contract, violation of public policy and intentional and negligent infliction of emotional distress, which arose out of the same core of operative facts and involve the same parties.

**JURISDICTION AND VENUE**

(3) This Court has subject matter jurisdiction over this action pursuant to section 107(a) of the Americans With Disabilities Act of 1990, 42 U.S.C. section 121117(a), adopting by reference sections 706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, 42 U.S.C. sections 2000 e-5 (f)(1) and (3); pursuant to 28 U.S.C. section 1331 and 1343; and pursuant to its pendant jurisdiction claims brought under the laws of the State of New Jersey.

(4) The employment practices hereafter alleged to be unlawful were committed in the District of New Jersey.

**PROCEDURAL REQUIREMENTS**

(5) On or about February 22, 1993, plaintiff filed a charge of discrimination with the Equal Employment Opportunity Commission ("EEOC"). The charges were filed within three hundred (300) days after one or more of the alleged unlawful employment practices in violation of 42 U.S.C. section 2000 e-5 had occurred.

(6) On or about January 18, 1994, the plaintiff received a Notice of Right to Sue. Plaintiff filed the complaint within 90 days after the date on which he received the Notice of Right to Sue.

**PARTIES**

(7) Plaintiff Edward Renaud is and was at all times material hereto a citizen of the United States and resident of Belford, New Jersey.



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(8) At all relevant times herein, the defendant, Edison Township Board of Education is a governmental entity in the State of New Jersey and has continuously had and does now have at least twenty-five (25) employees and is an employer within the meaning of the Americans With Disabilities Act, section 101(2), 42 U.S.C. section 12111(2).

(9) At all relevant times, the defendant Joseph Kreskey was an agent of the Edison Township Board of Education within the meaning of section 101(5)(A) of the Americans With Disabilities Act, 42 U.S.C. section 12115(A). His title was Superintendent of Schools.

(10) At all relevant times herein, the defendant Lorene Moore was an agent of the Edison Township Board of Education within the meaning of section 101(5)(A) of the Americans With Disabilities Act, 42 U.S.C. section 12115(A). Her title was Director of Personnel.

(11) At all relevant times, the defendant Donald Flor was an agent of the Edison Township Board of Education within the meaning of section 101(5)(A) of the Americans With Disabilities Act 42 U.S.C. section 12115(A). His title was Industrial Arts Supervisor.

(12) At all relevant times herein, defendants Kreskey, Moore and Flor acted individually and as agents of defendant Edison Township Board of Education and under color of State law to deprive plaintiff of his rights.

## STATEMENT OF FACTS

(13) Plaintiff is a tenured industrial arts teacher employed by the Edison Township Board of Education. As of August, 1992, he had been employed by the Edison Township Board of Education for eighteen (18) years.

(14) In 1984, plaintiff was diagnosed by a neurologist with narcolepsy, sleep apnea, severe sleep fragmentation and periodic leg movements. These four conditions are all sleep disorders that require plaintiff to take naps at regular intervals in order to avoid automatic behavior, which is, in essence, being asleep with your eyes open. In addition, any change in plaintiff's necessary schedule and environment with new courses would create stress which plaintiff's neurologist found would aggravate his medical condition. Plaintiff's physician reported that narcolepsy is a medical condition that results in a disability.

(15) Upon demand by Mr. Flor that plaintiff supply a letter certifying his fitness to teach, plaintiff immediately supplied a letter to the defendant Board of Education stating that he had the medical condition narcolepsy and was cleared to work as long as he continued his medication, which then became unavailable through his pharmacy, as it did in 1992. Medical documentation of his disability was placed in his personnel file.

(16) In addition, plaintiff requested that his disability be reasonably accommodated. From 1984 to September, 1992, when ordinary scheduling did not accommodate his disability, plaintiff's department chairman prepared plaintiff's teaching schedule to accommodate his disability, to wit: plaintiff was

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consistently assigned a High School teaching position to avoid a change in material and environment which would adversely affect his disability or given adequate time to learn any new curriculum assigned; and plaintiff's classes were scheduled with a 45-minute break (other than lunch break) after teaching no more than three classes in order that he may sleep. In this way, plaintiff's disability was effectively accommodated in a cost free manner for eight (8) years until September, 1992.

(17) In June, 1991, the then superintendent of schools who had always accommodated plaintiff's handicap retired and was replaced by defendant Kreskey.

(18) In April, 1992, plaintiff received a Reduction In Force ("RIF") letter from the defendant Board that a position was not available for him in the Fall, 1992.

(19) Anticipating a reappointment from the RIF list, as had been the case years prior, plaintiff in June, July and August made repeated statements of Donald Flor, who was the Industrial Arts Supervisor, as well as John Coe, the Industrial Arts Chairman who had previously arranged the accommodating assignment, that plaintiff would require accommodation in any position and that he remain in a High School Industrial Arts position which would accommodate his disability as to courses taught and class schedules. In previous years plaintiff had clearly stated that one free period at Middle School would deny accommodation.

(20) On or about August 3, 1992, defendant Donald Flor told plaintiff that plaintiff would be transferred to a position in

the Middle School to teach courses he had never taught before and with a schedule that provided only one free period. Plaintiff suggested to Mr. Flor that the Middle School position be given to the teacher who was newly assigned to teach what had previously been plaintiff's assignment, teaching metal shop; drafting portion of plaintiff's assignment would go to teacher who is either uncertified or may be a non-citizen, as an accommodation to plaintiff's disability. Indeed, that person was uncertified. Mr. Flor said he would "fight that" and that if plaintiff could not do the job, the school board would force him to retire on disability, and that the teaching schedule was 5 periods and a duty "take it or leave it."

(21) On August 11, 1992, plaintiff received a letter from defendant Lorene W. Moore, then Edison Township's Director of Personnel, reappointing plaintiff from the RIF list. In that letter, she listed plaintiff's assignment as a substitute position in the Middle School, justifying both RIF and assignment to a non-tenured without plaintiff's consent or due process, as defendant Flor had previously indicated, hiring out of correct line of seniority by at least three positions.

(22) On or about August 11 or 12, 1992, plaintiff telephoned defendant Moore and questioned her about the position to which he had been assigned. Defendant Moore informed him that it was a full pay position, but that there was no seniority or pension rights. Plaintiff told defendant Moore, in any event, he renewed his request for reasonable accommodation for his disability. She stated that the Board did not have to grant

reasonable accommodation, that rehiring plaintiff was accommodation enough. She also said that she did not know that he was disabled and that there was nothing to that effect in his file. Plaintiff informed her that he had been accommodated since September, 1984. Defendant Moore then demanded plaintiff write a letter informing the Board of his disability and requesting reasonable accommodation.

(23) On or about August 13, 1992, plaintiff wrote a letter to defendant Moore accepting the position as an *Industrial Arts* teacher and further stated his disability and requested a meeting to arrange a reasonable accommodation prior to the beginning of the school year.

(24) On or about August 17, 1992, John Coe, Industrial Arts department head, arranged a schedule for plaintiff at the High School which would accommodate his disability; Mr. Flor would not consider it because he said it was too much trouble.

(25) On or about August 26, 1992, a meeting was scheduled with defendant Flor for Friday, August 28, 1992. On that date, plaintiff arrived for the meeting only to be told that defendant Flor was out for the day, and later was informed by Mr. Gundry, Association President, that Lorene Moore had cancelled that meeting.

(26) On September 1, 1992, plaintiff reported to the Middle School to which he had been assigned since defendant Moore refused to accommodate his disability. He was given a schedule for a curriculum which he had not previously taught. In addition, outside of a 26-minute lunch break, plaintiff would

have no period off until the end of the day. and the schedule required plaintiff to teach 6 periods during the second marking period. Plaintiff could not use the lunch period to sleep, especially since he is a diabetic and must use the lunch period for eating. The principal of the Middle School told plaintiff he knew nothing about the accommodation and just wanted to know if he was using sick or personal days. Plaintiff replied that he did not exercise control over how days were designated, that the Board of Education having failed to continue accommodation to his disability, responsibility for pay for any days he could not work should be the responsibility of the Board of Education.

(27) On September 2, 1992, plaintiff's neurologist, June Fry, M.D., sent a letter via fax to defendant Moore which is attached hereto as Exhibit A. Pursuant to his doctor's direction which insisted he not work without accommodation, plaintiff told the principal of the Middle School that he would be unable to teach the assigned schedule since it did not accommodate his disability.

(28) On September 8, 1992, plaintiff met with defendants Moore and Flor, accompanied by his Union President. On or about August 17, 1992, John Coe arranged a schedule at the high school with accommodation. Mr. Flor refused to consider it, saying it would be too much trouble. Defendant Moore said that she would not be held to "time line" in regard to her decision on accommodation and she alone would decide what accommodation would be made, but would eventually come up with a schedule to accommodate plaintiff. All input from John Gundry, Union

9504370344

President, Mr. Flor and the plaintiff regarding possible compromise and the impracticality of providing accommodation at the Middle School was ignored. Plaintiff restated his request to be returned to the high school position with the medically required sleep intervals. He told defendant Moore that Middle School would not work out and proposed possible solutions.

(29) On or about September 17, 1992, plaintiff received a letter from defendant Moore setting out a second schedule. This second schedule was still a Middle School program without the required sleep intervals, combining "lunch/rest period." It also reduced plaintiff's pay by about $12,000 in violation of *N.J.S.A.* 18A:6-10, and the schedule substantially misrepresented the actual schedule the plaintiff would be required to teach.

(30) Plaintiff was never offered at that time his previous accommodation or any other accommodation, even though the Chairman of the Industrial Arts program at the high school said that it could be done.

(31) Plaintiff continued to make requests for reasonable accommodation, individually, as well as through counsel. Repeated attempts to discuss accommodation resulted in the reassertion that the Middle School program was the only position available. However, while denying the requested accommodation, in January, 1993, defendant Moore wrote to plaintiff and said, "Please be aware that the Board of Education is very interested in resolving this dilemma. I reiterate that your schedule will be accommodated in any manner you deem necessary. . ." Despite

this representation, plaintiff was not offered a reasonable accommodation for the 1992-1993 school year.

(32) In April, 1993, plaintiff received a RIF for the 1993-1994 school year, using an improper seniority list. As in the previous year, he was subsequently rehired in June of 1993 and received a notification of that rehiring was withheld until August of 1993. The position offered was the same position that provided no accommodation to the plaintiff's disability.

(33) Throughout 1993, plaintiff individually and through counsel renewed the repeated requests for accommodation directly to defendant Kreskey. None was provided. Plaintiff remained out of the classroom for the remainder of the 1993 school year, continuing suspension without pay or due process.

(34) After the reinstatement letter was issued, plaintiff again requested accommodation, having had no income for two periods of 5 months each during the preceding 14 months. Then in October, 1993, defendants first offered a Middle School schedule that would result in a reduction in pay and violates *N.J.S.A.* 18A:6-10, which the plaintiff refused. In response the defendants then offered plaintiff with a schedule in the high school which accommodates his sleep intervals. It was prepared by Department Head John Coe and was the same type of schedule which had reasonably and successfully accommodated plaintiff for eight years and was the same schedule he had been requesting for over one year and was denied despite the availability of that schedule.

(35) Plaintiff is presently working in that schedule.

950437/0043

(36) As a direct and proximate result of defendants' unlawful conduct, plaintiff has suffered loss of earnings, mental anguish and emotional distress; humiliation and embarrassment; loss of benefits and seniority rights and other monetary damages.

**FIRST CAUSE OF ACTION**

(37) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (35) of this complaint with the same force and effect as if fully set forth herein.

(38) By the above acts, defendants have violated the Americans With Disabilities Act, 42 U.S.C. section 12101, *et seq.* by discriminating against plaintiff because of his disability by failing to reasonably accommodate his disability, in the terms, conditions and privileges of his employment.

(39) Defendants' acts were done with malice and with reckless disregard for plaintiff's federally protected civil rights.

(40) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**SECOND CAUSE OF ACTION**

(41) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (39) of this complaint with the same force and effect as if fully set forth herein.



950437/00344

(42) By the foregoing acts, defendants Board of Education, Lorene Moore, Joseph Kreskey and Donald Flor aided and abetted or attempted to aid and abet in unlawful discrimination in violation of plaintiff's rights secured by *N.J.S.A.* 10:5-12(e).

(43) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**THIRD CAUSE OF ACTION**

(44) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (42) of this complaint with the same force and effect as if fully set forth herein.

(45) By the above acts, defendants have violated the New Jersey Law Against Discrimination, *N.J.S.A.* 10:5, *et seq.* by discriminating against plaintiff because of his disability by failing to reasonably accommodate his disability, in the terms, conditions and privileges of his employment.

(46) Defendants' acts were done with malice and reckless disregard for plaintiff's rights under the New Jersey Law Against Discrimination.

(47) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**FOURTH CAUSE OF ACTION**

(48) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (46) of this complaint with the same force and effect as if fully set forth herein.

(49) By the above acts, defendants have violated the New Jersey Administrative Code (*N.J.A.C.*) 13:13-2.5 by discriminating against plaintiff because of his disability by failing to reasonably accommodate his disability, in the terms, conditions and privileges of his employment.

(50) Defendants' acts were done with malice and reckless disregard for plaintiff's rights under the New Jersey Law Against Discrimination.

(51) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**FIFTH CAUSE OF ACTION**

(52) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (50) of this complaint with the same force and effect as if fully set forth herein.

(53) Defendants' actions were extreme and outrageous.

(54) By engaging in the aforesaid actions, defendants intended that plaintiff suffer severe emotional distress and mental anguish.

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(55) As a result of the defendants' intentional inflection of emotional harm, plaintiff suffered extreme emotional distress and mental anguish.

**SIXTH CAUSE OF ACTION**

(56) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (54) of this complaint with the same force and effect as if fully set forth herein.

(57) Defendants knew and/or should have known that his aforesaid actions would unreasonably subject plaintiff to a risk of illness or bodily harm.

(58) As a result of defendants' above said actions, plaintiff has suffered economic damage, emotional, physical and psychological damage, humiliation and loss of self-esteem, loss of earnings and benefits and seniority rights and other monetary damages.

**SEVENTH CAUSE OF ACTION**

(59) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (57) of this complaint with the same force and effect as if fully set forth herein.

(60) Defendants, as a direct result of their foregoing acts, failed in good faith regarding plaintiff's employment contract with defendant employer.

(61) Defendant Board, as a direct result of the acts of its agents breached its contract with plaintiff, thereby causing him monetary damage.

**EIGHTH CAUSE OF ACTION**

(62) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (60) of this complaint with the same force and effect as if fully set forth herein.

(63) By the foregoing acts, defendants violated the public policy of the State of New Jersey.

(64) By reasons of the actions complained of above, plaintiff suffered damages, including economic loss; time loss; physical and emotional stress; anxiety caused by lack of information, uncertainty and resultant planning difficulty; career, family and social disruption; and adjustment problems.

**NINTH CAUSE OF ACTION**

(65) Plaintiff repeats and realleges each and every allegation in paragraphs numbered (1) through (63) of this complaint with the same force and effect as if fully set forth herein.

(66) By the foregoing acts, defendants Lorene Moore, Joseph Kreskey and Donald Flor tortiously interfered with plaintiff's contractual relations with defendant Edison Township Board of Education.

(67) By reasons of the actions complained of above, plaintiff suffered damages, including economic loss; time loss; physical and emotional stress; anxiety caused by lack of information, uncertainty and resultant planning difficulty; career, family and social disruption; and adjustment problems.

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**PRAYER FOR RELIEF**

**WHEREFORE, plaintiff respectfully prays that this Court:**

**1. That the Court declare defendants' conduct complained of in the First Cause of Action herein to be in violation of plaintiff's rights as secured by the Americans With Disabilities Act;**

**2. That the Court declare defendants' conduct complained of in the Second through Ninth Causes of Action herein to be in violation of the plaintiff's rights as secured by the laws of the State of New Jersey;**

**3. That the Court permanently enjoin defendant Board of Education and its offices, management, personnel, employees, agents, attorneys, successors and assigns and those acting in concert therewith from any conduct violating plaintiff's rights as secured by the Americans With Disabilities Act;**

**4. That plaintiff be awarded compensatory damages;**

**5. That plaintiff be awarded punitive damages;**

6. That plaintiff be awarded attorney's fees and costs incurred in prosecuting this action;

7. That plaintiff be awarded such additional and further relief as it deems just and proper; and

8. A trial by jury is demanded.

CHAMLIN, ROSEN, CAVANAGH & ULIANO, P.C.
Attorneys for Plaintiff Edward Renaud

BY: /s/ Sharon Lynch Norton
SHARON LYNCH NORTON

Dated: April 11, 1994



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# PART 5 DIRECTORY OF PARTIES INVOLVED

DIRECTORY OF WITNESSES/ PARTICIPANTS

THE EDISON TOWNSHIP BOARD OF EDUCATION.

---

**PUBLIC SCHOOLS OF EDISON TOWNSHIP**
**Middlesex County, New Jersey**

**BOARD OF EDUCATION**
**100 Municipal Boulevard**
**Edison, New Jersey 08817**

**President**

**SURIANO, William W. (Dr.)**
**53 Knapp Avenue, Edison, N.J. 08817** **(908) 572-3055**

**Vice President**

**BAYARD, Ralph**
**15 Carriage Place, Edison, N.J. 08820** **(908) 906-0566**

**Members of the Board**

**DICKINSON, David J.**
**240 Wellington Place, Edison, N.J. 08817** **(908) 985-1311**

**GULYA, Nanci R.**
**11 Jennifer Court, Edison, N.J. 08820** **(908) 494-6283**

**KESSELMAN, Gwynne**
**9 Kester Drive, Edison, N.J. 08817** **(908) 548-2123**

**LABASI, Philip G.**
**197 W. Shirley Avenue, Edison, N.J. 08820** **(908) 396-3695**

**LACORTE, Joseph**
**115 Elizabeth Avenue, Edison, N.J. 08820** **(908) 549-3081**

**MILLER, Barry F.**
**297 Central Avenue, Edison, N.J. 08817** **(908) 985-7016**

**TUDOR, John L.**
**17 Meredith Road, Edison, N.J. 08817** **(908) 572-2865**



D-1

9504370085 1

ADDITIONAL BOARD OF EDUCATION EMPLOYEES.
- INDIVIDUALS WHO ARE ACTIVELY INVOLVED IN E.T.E.A./ UNION ACTIVITIES HAVE THEIR NAMES UNDERLINED.

BANKS, MARY ANN
P.O. BOX 272
KENDALL PARK, N.J. 08824
908-548-9257
— VICE PRINCIPAL, EDISON HIGH SCHOOL

CANGELOSI, FRANK.
1213 ANDOVER ROAD
FORKED RIVER, N.J. 08731
— PRINCIPAL, EDISON HIGH SCHOOL

DR. CARARO, VINCENT
184 GROVE AVENUE
WOODBRIDGE N.J. 07095
908 634-2953
— ASST. SUPERINTENDENT OF SCHOOLS.

CIOCIOLA, FRED
2086 ARBOR WAY
MARTINSVILLE, N.J. 08836
908 356-0811
— E.T.E.A. GRIEVANCE CHAIRPERSON,

COE, JOHN
28 SHARRER ROAD
PORT MURRAY, N.J. 07865
908-832-7456.
— DEPT. CHAIRPERSON / DISTRICT SUPERVISOR, RELATED ARTS.

DR. DECASTRO, VILLANUEVA
180 LAFAYETTE AVENUE
EDISON, N.J. 08837
— BOARD OF EDUCATION'S CHIEF MEDICAL INSPECTOR



95043700352

FLOR, DONALD
29 WILLIAMS ROAD
EDISON, N.J. 08820
908- 549-4956

SUPERVISOR OF RELATED ARTS

MC MANUS, MARGARET
P.O. BOX 206
OLD BRIDGE, N.J. 08857

PAYROLL SUPERVISOR, BOARD OF EDUCATION

MICHAUD, DANIEL
154 RIDGE ROAD
COLONIA, N.J. 07067
908-381-9542

BUSINESS ADMINISTRATOR, BOARD SECRETARY.

MOORE, LORENE
2 ARDSLEIGH COURT
MOUNT LAUREL, N.J. 08054

PERSONNEL DIRECTOR FOR THE BOARD OF EDUCATION, RESIGNED JULY 1992.

PIPALA, DENNIS.
148 EDISON AVENUE
EDISON, N.J. 08820

BOARD OF EDUCATION PRESIDENT, PRESIDED OVER OBSTRUCTION OF MY RIGHT TO DUE PROCESS, PRIVACY, EQUAL PROTECTION.

DR. REHMAN, FAROOQ.
42 PARSONAGE ROAD
EDISON N.J. 08820

NEUROLOGIST PICKED BY LORENE MOORE TO "EXAMINE" ME ILLEGALLY.

SAMOLEWICZ, EDWARD.
37 BERTRAND STREET
OLD BRIDGE, NW. 08857
908 679-3751

VICE PRINCIPAL. EDISON HIGH SCHOOL

SCHRODER, THOMAS
41 FABIAN STREET
STATEN ISLAND, N.Y. 10312
718-984-4142.

NON-DEGREED/NON-CERTIFIED TEACHER GIVEN EMPLOYMENT PREFERENCE FOR THE 92-93 SCHOOL YEAR, AND SINCE MY EMPLOYMENT IN 1974

SHANKS, ROBERT.
431 WINDMILL WAY
BRANCHBURG, N.J. 08876

MATH SUPERVISOR PRESENT AT MEETING OF JULY 7, 199 . WHERE FRAUDULENT SENIORITY LIST IS USED TO JUSTIFY POSSIBILITY THAT I WOULD HAVE TO TEACH W MIDDLE SCHOOL.

TODT, ARTHUR
51 OAKLAND DRIVE E.
WHITEHOUSE STATION N.J. 08889
908-534-2034

UNCERTIFIED TEACHER GIVEN EMPLOYMENT PREFERENCE FOR 1991, -1992-1993 SCHOOL YEARS (AND SINCE MY EMPLOYMENT IN 1974

TRAFICANTE, ROSANNE
8 MAPLE STREET
PORT MONMOUTH, N.J. 07758
908-787-4589

MIDDLE SCHOOL PRINCIPAL AT WOODROW WILSON. KNEW OF CONSTITUTIONAL VIOLATIONS DISGUISED AS FAILURE TO ACCOMMODATE

DSJ ASSOCIATES.
241-245 HALEDON AVENUE
HALEDON, NEW JERSEY 07508

HIRED BY BOARD OF EDISON TO REPRESENT AT UNEMPLOYMENT HEARINGS DEC. 4, 1992- INSTRUCTS LORENE MOORE TO FALSIFY THE RECORD.

VENTOLA, RALPH F (TEACHER)
26 MANNY WAY
RED BANK, N.J. 07701

KNEW OF CONSPIRACY, FRAUDULENT SENIORITY LIST IN 1989, OBTAINED INFORMATION FROM ME FOR CONSPIRING PARTIES.

D-4

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## CENTRAL ADMINISTRATION

100 Municipal Boulevard
Edison, New Jersey 08817
(908) 287-4400

PERSI, Melindo A. ..... Superintendent of Schools

KRESKEY, Joseph A. (Dr.) ..... Former Superintendent of Schools

CAPRARO, Vincent (Dr.) ..... Assistant Superintendent

MICHAUD, Daniel P. ..... School Business Administrator/
Board of Education Secretary

VOORHEES, Garrett ..... Director of Administrative Services

FERENCZI, R. Joseph, Esq. ..... Board of Education Attorney
1901 Lincoln Highway, Edison, NJ 08817

DI MUZIO, John ..... Director of Health, Physical
Education & Athletics

IKEDA, Shirley (Dr.) ..... Director of Special Services

RANTA, Robert ..... Director of Basic Skills,
Testing/Special Programs

P504370005

WHITE, LAWRENCE
ADDRESS UNKNOWN
AVAILABLE THRU. E.T.E.A.

AS E.T.E.A. GRIEVANCE CHAIRPERSON HE WAS PARTY TO 1984 CONSPIRACY + FRAUD; HE TOLD ME THAT I HAD REVERSED SENIORITY WITH RALPH VENTOLA IN 1984

SELMA YOUNG
12 WILK ROAD
EDISON, N.J. 08837

SECRETARY, EDISON HIGH SCHOOL
SAW MISSING/DESTROYED PAYCHECK
ISSUED IN SEPT. OF 1982.

950437/000356

ACTING PARTIES WITH AFFILIATION WITH THE EDISON TOWNSHIP EDUCATION ASSOCIATION; NEW JERSEY EDUCATION ABEOCIATION

JOHN GUNDAY, PRESIDENT
EDISON TOWNSHIP EDUCATION ASSOCIATION.
DURHAM CENTER, STE 203 A.
2 ETHEL ROAD. -
EDISON, N.J. 08817 -

HOME
10 NORTH STAR DRIVE
ANNANDALE N.J.
08801
908-236-7416

MICHAEL PARISE, N.J.E.A./MIDDLESEX COUNTY UNISERV REPRESENTATIVE.
LAST KNOWN ADDRESS - RESIGNED? AUGUST 1993.
1 ETHEL ROAD, SUITE 107A, DURHAM CENTER
EDISON, N.J. 08817 2838 908-287-4700

DONALD TARR, N.JEA./MIDDLESEX COUNTY UNISERV REPRESENTATIVE
1 ETHEL ROAD, SUITE 107A, DURHAM CENTER
EDISON, N.J. 08817 2838 908-287-4700

JOHN WARMS, N.J. EDUCATION ASSOCIATION (FIELD REPRESENTATIVE)
N. J. E.A. HEAD QUARTERS
180 W. STATE STREET.
P.O. BOX 1211, TRENTON, N.J. 08607-124 609-599-4561

STEPHEN KLAUSNER, (N.J.E.A., PAID ATTORNEY)
LAWRENCE J. VAN WEES, (N.J.E.A. PAID ATTORNEY)
63 EAST HIGH STREET
P.O. BOX 1012
SOMERVILLE, N.J. 08876
908: 685-1552

SHARON LYNCH NORTON (LONG BRANCH CITY ATTORNEY)
THOMAS CAVANAGH (N.J.E.A. PAID ATTORNEY)
268 NORWOOD AVENUE
P.O. BOX 38 908-229 3200
WEST LONG BRANCH, N.J. 07764



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WASHINGTON NATIONAL INSURANCE COMPANY - NEW JERSEY EDUCATION ASSOCIATION HOLDS THE DISABILITY INSURANCE POLICY FOR MY CERTIFICATE OF INSURANCE THRU THAT COMPANY.

WASHINGTON NATIONAL INSURANCE COMPANY
NEW JERSEY CLAIMS OFFICE. -TPA 114
100 WALNUT AVENUE. SUITE 604
CLARK, N.J. 07066
908-396-0090

CHRISTINE HAMPP, CLAIMS ANALYST.
D. SERAFIN, CLAIMS ANALYST.

---

VALIC (VARIABLE ANNUITY LIFE INSURANCE COMPANY)
90 WOODBRIDGE CENTER DRIVE
SUITE 410 WOODBRIDGE, NEW JERSEY 07095
908-750-5611

BARRY BROWN, ACCOUNT REPRESENTATIVE
LORI A. CHESNOWSKI, CUSTOMER SERVICE SUPERVISOR.

---

MONMOUTH COUNTY - INDIVIDUALS INVOLVED EITHER THROUGH POLITICS OR THROUGH MY MEDICAL CARE/INSURANCE.

MIDDLETOWN PHARMACY
H. SCHULMAN, R.P.
MAIN STREET AT CAMPBELL'S JUNCTION
BELFORD, N.J.
908 671-2121

DR. ANTHONY BRUNO, M.D.
150 CHERRY TREE FARM ROAD
MIDDLETOWN, N.J. 07748
908 671-1666
AND HIS SECRETARY, MRS. CROKEN.

DEPARTMENT OF LABOR
UNEMPLOYMENT INSURANCE SERVICE
CN 936 · LABOR BUILDING
TRENTON, N.J. 08625-0936
PHONE 609-292-6550 DIRECTOR OF PROGRAMS 609-292-2960

INDIVIDUALS INVOLVED IN RETALIATION, HARASSMENT, OBSTRUCTION.

M. KOVACS. - CLAIMS EXAMINER, DEPUTY FOR VIVIEN SHAPIRO
VIVIEN SHAPIRO - DIRECTOR
MARY SIEBER - CHIEF CLAIMS EXAMINER.
RONALD GITTER - APPEALS EXAMINER.
CORNELIA CALDERONE, BOARD OF REVIEW SECRETARY.
VINCENT C. MARTORANO BOARD OF REVIEW
JOSEPH SIEBER, BOARD OF REVIEW.
NANCY HUNT APPEALS EXAMINER
ROSALIE CREANZO APPELATE SPECIALIST.

PARTIES REPRESENTING THE BOARD OF EDUCATION RESPONSIBLE FOR RETALIATION HARASSMENT
NEC. - NATIONAL EMPLOYERS COUNCIL, INC.
241 WEST FAYETTE STREET
P.O. BOX 4816
SYRACUSE, NEW YORK 13221 4816
PHONE · 315-471-2627
471-2072.

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DR HAROLD CHAFKIN. M.D.
565 HIGHWAY 35
RED BANK, NEW JERSEY 07701
908 671-1177
AND HIS NURSE, KNOWN TO ME AS CAROLYN.
HIS ASSISTANT KNOWN TO ME AS RAE.

---

CONGRESSMAN PALLONE'S STAFF

GENEVIEVE M. HAWLEY
DISTRICT OFFICE MANAGER
OFFICE OF CONGRESSMAN PALLONE
1. E.I., AIRPORT PLAZA
HAZLET, N.J. 07730
908-264-9104

---

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

CORRANADO GIGANTE. DIRECTOR, NEWARK OFFICE OF THE E.E.O.C.
1 NEWARK CENTER
21ST STREET
NEWARK, N.J 07102 5233

---

CONNECTICUT GENERAL LIFE INSURANCE COMPANY
AGENT FOR: EDISON TOWNSHIP BOARD OF EDUCATION.
P.O. BOX 15395
WILMINGTON, DE 19850-5395 1-800-628-0320

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DEMOCRATIC STATE COMMITTEE
150 W. STATE ST.
TRENTON, N.J. 08608
PHONE - 609-392-3397

CHAIRMAN. RAYMOND J. LESNIAK
VICE CHAIRMAN. ALICE GORSEY.

MONMOUTH COUNTY DEMOCRATIC COMMITTEE
STATE HWY NO 36
HAZLET N.J.
908-576-8181

MIDDLESEX COUNTY DEMOCRATIC COMMITTEE
- PLEASE CONTACT THE STATE COMMITTEE
FOR ADDRESS, PHONE NUMBER AND MEMBERS.

---

INSERVCO INSURANCE SERVICES, INC.
P.O. BOX 7366
WEST TRENTON, N.J. 08628-0366
PHONE 609-883 0044

I BELIEVE THAT THIS COMPANY HOLDS THE LEGAL LIABILITY POLICY FOR THE BOARD OF EDUCATION IN EDISON. AT THIS POINT I CANNOT CONFIRM THIS. THIS COMPANY WOULD HAVE A STRONG FINANCIAL INTEREST IN ASSURING THAT THE EDISON BOARD OF EDUCATION WOULD NOT INCUR ANY LAWSUITS BASED ON WHAT I HAVE DOCUMENTED IN THE ACCOMPANYING BINDINGS OF DOCUMENTS DESCRIBING THE PAST 10 YEARS WHERE THE CONSPIRING PARTIES NAMED HAVE ACTED TO OBSTRUCT MY RIGHTS.

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9504370062

PART 6 TITLE II COMPLAINT AGAINST THE N.J.
DEPARTMENT OF LABOR

PART 6 OF 6

U.S. Department of Justice
Civil Rights Division
*Coordination and Review Section*

# Title II of the Americans with Disabilities Act / Section 504 of the Rehabilitation Act of 1973 Discrimination Complaint Form

**Instructions: Please fill out this form completely, in black ink or type. Sign and return it to the address on page 3.**

Complainant: EDWARD H. RENAUD

Address: 508 FOX AVENUE

City, State and Zip Code: BELFORD N.J. 07718

Telephone: Home : 908 495-2531 - MESSAGES 908-388-8929

Business : 908-985-2900 / THIS IS MY NUMBER AT EDISON HIGH SCHOOL - I HAVE AN EXPECTATION THAT THEY WILL ALLOW CALLS OR MESSAGES TO ME TO COME TO MY ATTENTION

Person Discriminated Against: (if other than the complainant) _____

Address: _____

City, State and Zip Code: _____

Telephone: Home : _____

Business : _____

Government, or organization, or institution which you believe has discriminated:
ACTING AS A PARTY IN CONSPIRING TO OBSTRUCT MY RIGHTS

Name: STATE OF NEW JERSEY, DEPARTMENT OF LABOR, UNEMPLOYMENT INSURANCE SERVICE ACTING WITH MY EMPLOYER THE EDISON TOWNSHIP BOARD OF EDUCATION.

Address: CN 936 . LABOR BUILDING

City, State and Zip Code: TRENTON, N.J. 08625-0936

Telephone Number: 609-292-6550 DIRECTOR OF PROGRAMS 292-2460

When did the discrimination occur? Date : 9/12/92 THRU THE PRESENT

OMB Approval No. 1190-0009 Exp. 5/31/95

9504370003

Describe the acts of discrimination providing the name(s) where possible of the individuals who discriminated (use space on page 3 if necessary): SEE DIRECTORY FOR INDIVIDUALS INVOLVED

THE NEW JERSEY DEPARTMENT OF LABOR HAS ACTED AS ONE OF THE PARTIES INVOLVED IN CONSPIRING TO OBSTRUCT MY RIGHTS. THESE INTERESTS HAVE BEEN TO DENY ME STATE AND FEDERAL BENEFITS TO ASSIST THE BOARD OF EDUCATION OF EDISON, THE EDISON TOWNSHIP EDUCATION ASSOCIATION AND THE ATTORNEYS PAID BY THE NEW JERSEY EDUCATION ASSOCIATION IN ASSURING THAT I COULD NOT ESCAPE "UNION" ATTORNEYS OR PROTECT MYSELF FROM THEIR ACTIONS. I FINALLY RECEIVED BACK PAYMENT OF MY BENEFITS IN MAY OF 1993. THE DEPT. OF LABOR HAS CONTINUED SINCE THAT TIME TO CONSPIRE WITH THE PARTIES INVOLVED TO HARASS ME (SEE PAGE DL 1 TO 82) AND RETALIATE AGAINST ME.

Have efforts been made to resolve this complaint through the internal grievance procedure of the government, organization, or institution? Yes [X] No [ ]

If "yes" what is the status of the grievance?

I HAVE ADDRESSED THIS ISSUE BEFORE THE STATE ATTORNEY GENERAL, THE N.J. DIVISION ON CIVIL RIGHTS, THE COMMISSION ON INVESTIGATION, AND CONTACTED THE DEPT. OF LABOR (U.S + STATE). IT IS MY UNDERSTANDING THAT IF THE LABOR DEPT. ENGAGES IN CRIMINAL CONSPIRACY, HARASSMENT, RETALIATION, ACCEPTS FRAUDULENT DOCUMENTS, DENIES ME DUE PROCESS, THE RIGHT TO SUBPOENA WITNESSES OR DOCUMENTS, DESTROYS DOCUMENTS AND ALTERS HEARING TAPES TO CONCEAL PERJURY AND DESTROY TESTIMONY THAT THERE IS NO AUTHORITY IN THE STATE GOVERNMENT THAT SUPERVISES, CONTROLS OR PROVIDES ANY GRIEVANCE PROCEDURE.

Has this complaint been filed with another bureau of the Department of Justice or any other Federal, State, or local civil rights agency or court? Yes [X] No [ ] THE N.J. DIVISION OF CIVIL RIGHTS DOES NOT ALLOW INDIVIDUALS TO FILE COMPLAINTS; THEY DECIDE WHAT COMPLAINT I CAN FILE.

If "yes":

Agency or Court: THE NEW JERSEY DIVISION ON CIVIL RIGHTS (THEY REFUSE TO ACT.)

Contact Person: DARREN J. BOLDEN (INVESTIGATOR) DEBORAH T. PORITZ, ATTORNEY GENERAL

Address: DIVISION ON CIVIL RIGHTS ... CN 090

City, State and Zip Code: TRENTON, N.J. 08625-0089

Telephone Number: 609-984-3059

Date Filed: ORIGINALLY FILED WITH PHILA. PA. EEOC - COMPLAINT DISAPPEARED. FILED WITH N.J. DIV. ON CIVIL RIGHTS ONLY AS A AFFADAVIT (SEE STATEMENT ABOVE)

Do you intend to file with another agency or court? Yes [ ] No [ ]

Agency or Court: TO MY KNOWLEDGE THERE IS NO JURISDICTION IN

Address: THE STATE OF NEW JERSEY THAT HANDLES COMPLAINTS AGAINST

City, State and Zip Code: THE STATE GOVERNMENT. STATE SUPERIOR COURT MIGHT BE

Telephone Number: A AVENUE BUT I HAVE NO ATTORNEY. THEY DO NOT REPRESENT IN CONSPIRACY WHICH IS A CRIME.

Additional space for answers: THE ACTIONS OF THE LABOR DEPT./UNEMPLOYMENT INSURANCE THE EDISON BOARD OF EDUCATION, MY EMPLOYER ARRANGED TO HAVE MY UNEMPLOYMENT BENEFITS DENIED THRU CORRUPT POLITICAL INFLUENCE/SEE DOCUMENTS ATTACHED DL 1 THRU 82} AS YOU WILL SEE IT DOES NOT MATTER WHAT DOCUMENTS I SUBMIT OR WHAT TESTIMONY I MAKE. THE ATTORNEYS CLAIMING TO REPRESENT ME WOULD NOT ENTER THE CORRECT STATEMENT THAT I WAS SUSPENDED WITHOUT PAY OR DUE PROCESS. THEY ACTED EXCLUSIVELY TO CONCEAL THAT THE BOARD OF EDUCATION OF EDISON AND E.T.E.A. WERE USING MY DISABILITIES AS A MEANS OF FORCING ME OUT OF MY JOB. AS CONSPIRING PARTIES SINCE 1984 THEY HAD ACTED TOGETHER TO DISCRIMINATE AGAINST ME BECAUSE OF REAL OR ANTICIPATED HEALTH CARE COSTS. THE NEW JERSEY [redacted]

Signature: Edward Renard

Date: MARCH 11, 1995

Return to:

U.S. Department of Justice
Civil Rights Division
Coordination and Review Section
P.O. Box 66118
Washington, DC 20035-6118



950437/000365

EDUCATION ASSOCIATION, THE STATES LARGEST AND MOST POLITICALLY POWERFUL UNION WAS PAYING ATTORNEYS TO OBSTRUCT MY RIGHTS TO DUE PROCESS IN EVERY JURISDICTION. THE DEPT. OF LABOR IN NEW JERSEY HAS PROVEN TO BE AS CORRUPT AS THE E.E.O.C. IN NEWARK, THE STATE ATTORNEY GENERAL'S OFFICE, THE PHILADELPHIA E.E.O.C. AND EVERY JURISDICTION I HAVE CONTACTED. AND AS STATED IN THE ADDITIONAL BINDINGS OF DOCUMENTS I HAVE SUPPLIED CORRUPTION IS DIRECTLY TRACEABLE TO POLITICS, PARTICULARLY TO THE MIDDLESEX COUNTY AND MONMOUTH COUNTY DEMOCRATIC PARTIES, CONGRESSMAN PALLONE'S 6TH DISTRICT, AND THE ATTORNEY'S INVOLVED IN OBSTRUCTING MY RIGHTS SINCE FEBRUARY OF 1993 ARE DIRECTLY TRACEABLE TO CONGRESSMAN PALLONE'S POLITICAL ORGANIZATION.

TO EXPEDITE REVIEW OF THIS COMPLAINT I SUGGEST THAT YOU READ. MY CORRESPONDENCE, ANY OF THE DOCUMENTS ORIGINATED BY THE EMPLOYEE'S OF THE EDISON SCHOOL BOARD, THE DEPT. OF LABOR, OR THE ATTORNEY THOMAS CAVANAGH ARE FRAUDS DESIGNED TO CONVEY THE APPEARANCE THAT THEY ARE ALL ACTING CORRECTLY AND WITHIN THE LAW WHILE IGNORING THE ISSUE THAT MY CONSTITUTIONAL RIGHTS TO DUE PROCESS AS A TENURED TEACHER ARE BEING OBSTRUCTED. THE DEPT. OF LABOR IS PURSUING THAT SAME COURSE OF ACTION OF DENYING ME DUE PROCESS; I AM NOT ALLOWED TO SUBPOENA ANY WITNESSES OR DOCUMENTS. I HAVE PUT A BLACK BOX AROUND THE PAGES OF THE CORRESPONDENCE I ORIGINATED TO HAVE IT STAND OUT FROM THE REST OF THE 2½ YEARS OF STATE SPONSORED DOCUMENTATION OF HARASSMENT, RETALIATION AND CORRUPTION, THOSE SUMMARIZE THE SITUATION.

IN SUMMARY:

THE EDISON BOARD OF EDUCATION HAS REFUSED TO APPEAR AT ANY HEARING SINCE DEC. 4, 1992. AT THAT HEARING THE BOARD'S PERSONNEL DIRECTOR LORENE MOORE COMMITTED PERJURY. WHEN I LATER RECEIVED THE COPIES OF THE



950437003356

TAPES OF THAT HEARING TESTIMONY HAD BEEN REMOVED AND ALTERED TO CONCEAL THAT ACT.

THE BOARD OF EDUCATION REFUSES TO ATTEND HEARINGS, CLAIM THEY DID NOT RECEIVE NOTICE OF THE HEARING AND ARE ALLOWED TO APPEAL. IT IS OF INTEREST THAT THEY ALWAYS RECEIVE NOTICE THAT THEY LOST BECAUSE THEY DID NOT APPEAR SO THAT THEY CAN APPEAL AGAIN, AND THAT HEARINGS NEVER PROGRESS BEYOND "APPEALS HEARINGS" AND ARE REGULARLY REMANDED BACK TO APPEALS EXAMINERS SO THAT THE PEOPLE RESPONSIBLE FOR DIRECTING HARRASSMENT DON'T HAVE TO PUT THEIR NAMES ON THEIR ACTIONS.

PAGES DL-68 THRU 82 ARE PARTICULARLY ILLUSTRATIVE OF THE ACTIONS OF THE LABOR DEPT.

DL-68 - THERE ARE NOW 3 ISSUES TO BE HEARD, EACH REQUIRING A HEARING AND FOR ME TO TAKE A ½ DAY OR FULL DAY OFF FROM MY TEACHING POSITION.

DL-69 - THE BOARD AGAIN LOSES (THEY IGNORE THE FACT THAT THE BOARD HAS NOT APPEARED AT ANY HEARING SINCE 1992 IS IGNORED

DL-72 — THE NEC CO. FILES AN APPEAL CLAIMING THEY DON'T KNOW ABOUT THE HEARING

DL-74 TO 77 I AGAIN STATE THE FACTS OF THE PREVIOUS 2 YEARS REGARDING THE ACTIONS OF THE BOARD OF EDUCATION. AND THE DEPT OF LABOR

DL-78 THE DEPT. OF LABOR RETALIATES AND RAISES THE ISSUES TO BE HEARD TO 4, EACH WILL REQUIRE A SEPERATE HEARING REQUIRING ME TO TAKE OF FROM WORK.

DL-82 - THE DEPT. OF LABOR AGAIN HAS ROSALIE CREANZO DENY ME THE RIGHT TO SUBPOENA ANY WITNESSES OR DOCUMENTS. I HAVE SPOKEN TO MS. CREANZO, SHE CANNOT EXPLAIN WHY THERE ARE 4 ISSUES TO BE HEARD. AND ON PAGE DL-80 SHE HAS NOW SCHEDULED HEARINGS FOR 10:00 AM SO THAT I WILL MISS A COMPLETE DAY OF WORK.



0504370003867

DL-82 CONTINUED.

NOW EACH OF 4 ISSUES REQUIRES THAT THERE BE 2 HEARINGS FOR EACH ISSUE, ONE TO DECIDE WHAT DOCUMENTS OR PEOPLE CAN BE SUBPOENAED, AND ANOTHER TO HEAR ON THAT ISSUE. WHICH MEANS I WILL HAVE TO MISS 8 DAYS OF WORK. TO ANSWER TO EDISON'S ENDLESS APPEALS.

AND HERE IS THE BASIS FOR A ADDITIONAL COMPLAINT AGAINST THE EDISON TOWNSHIP BOARD OF EDUCATION: I HAVE BEEN NOTIFIED THAT THE BOARD OF EDUCATION (THRU DR. VINCENT CARRARO, ASSISTANT SUPERINTENDENT) THAT THEY WILL TAKE ONE OF MY PERSONAL DAYS FROM ME SO THAT I CAN APPEAR AT THE APPEAL HEARING. I HAVE THE EXPECTATION THAT THEY WILL THEN DEDUCT 8 DAYS PAY FOR EACH OF THE FOLLOWING SEVEN HEARINGS ON THEIR APPEAL.

AGAIN THE CONSPIRING PARTIES HAVE ACTED TOGETHER TO USE THE CORRUPT DEPT. OF LABOR AS A MEANS OF DAMAGING ME FINANCIALLY AS THEY HAVE FOR THE PAST 2½ YEARS. AND AS I HAVE STATED THROUGHOUT; THERE IS NO JURISDICTION IN NEW JERSEY THAT RECOGNIZES STATE, FEDERAL, CIVIC OR CRIMINAL VIOLATIONS OF LAW; POLITICS SUPERCEDES JUSTICE AND THE CONSTITUTION.

950430/000168

PLEASE EXCUSE THE USE OF MY NOTE STAMP. I HAVE PREVIOUSLY TRIED TO COMPLETE A LENGTHY NARRATION OF THE 2½ YEAR OLD UNEMPLOYMENT CLAIM AND USED THAT NOTE STAMP TO POINT OUT SIGNIFICANT EVENTS, MIS-STATEMENTS OF FACT OMISSIONS OF DOCUMENTS AND BLATANTLY FALSE AND DISCRIMINATORY STATEMENTS.

I BELIEVE THAT THE PRECEDING 6 PAGES AND THE ADDITIONAL BINDINGS OF DOCUMENTS ACCURATELY PORTRAY THE CORRECT SITUATION; THAT THE N.J. DEPT. OF LABOR IS CORRUPT AND COMPLETELY WILLING TO ACT IN CONSPIRING TO OBSTRUCT MY RIGHTS WHILE BEING ASSURED THAT THE POLITICS OF CORRUPTION WILL PROTECT THEM.

SS.N. 130 42 1424

DOC 6-8892 | PC 10 | LO 457

Name

D.O.B.

| | |
|---|---|
| ASW Status Mod. | T.M.L. |
| 1 - VER. SSN By | 4 - E.R.I. Scheduled |
| 2 - VER. DEP. By | 5 - |
| 3 - E.S. REG. On | 6 - |

DOT Code ____ ERI Code ____

APPOINTMENT DATE RECORD

| | | | | | |
|---|---|---|---|---|---|
| 7-1-92 | RS | | | | |
| 7-17-92 | PH | Referred to BEI @ | | | 1:00 |
| 7-17-92 | BE | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

NOTE

RECORD OF THIS CLAIMS INTERVIEW HAS DISAPPEARED

DL-1

BC-323 (R-2-89) N. J. Department of Labor - Division of Unemployment & Disability Ins.

# FACT FINDING RECORD FOR AVAILABILITY

Local Office Stamp: Unemployment Insurance Service
347 Maple Street 951
North Amboy, NJ.

NAME: Gerard Renaud PC W DOC 625.9 SS# 150-42-1484

NOTICE: REASON FOR REFERRAL
Refused Jcl offered A

FOR A PROMPT DETERMINATION ON YOUR CLAIM FOR BENEFITS, PLEASE ANSWER QUESTIONS 1THROUGH 9 BELOW

1. Name and Address of last employer: EDISON BOARD OF EDUCATION, 100 MUNICIPAL BLVD. EDISON N.J.
2. How long did you work? FROM (month) FEB (date) 15 (year) 1974 TO (month) JUNE (date) 20 (year) 1992
3. What was your rate of pay? $ 1,100 WEEK per (hour, week)
4. What hours and days did you normally work? HOURS: From 8:40 To 2:35 DAYS: From MON To FRI
5. What kind of work did you do? TEACHING INDUSTRIAL ARTS, DRAFTING AND METALWORKING
6. Are you seeking work in your regular occupation at about the same pay, hours, and distance as above? ☒ Yes ☐ No
   (If no, explain any changes in Item 9.)
7. During the above period, were you: (Check all that apply and explain in Item 9)
   _____ Attending a training course or school (If yes, give hours attending and course content)
   _____ Taking care of children or other household members during regular working hours
   _____ Hospitalized, sick, pregnant, injured, or receiving disability (dates, nature of)
   _____ Legally detained or incarcerated (give dates)
   _____ On a leave of absence from job or on vacation (give details including dates)
   _____ On jury duty or performing a public service (give details including dates)
   _____ Out of the area, tending to personal matters, or unavailable more than 1/2 day (dates and details)
   _____ Receiving any other payments (pension, disability, SS, other) (type, amount, details)
   _____ Self-employed or other income (source, amount, hours involved)
8. Please complete statement below by filling in blanks or crossing out the word that does not apply.
   Any answer you feel needs to be explained, circle it and explain in Item 9.
   I am seeking (full) part) time work as a TEACHER (type of work desired) but would also accept work as a TECHNICIAN. . I prefer to work the (1st 2nd, 3rd) shift but will also work on the (1st 2nd 3rd any) shift.
   I have 18 years experience in this type of work. I want $ 450 per (hour, week) but would accept as low as $ 400 per (hour, week).
   I am, am not a member of a union-if a member, the name of the union is EDISON TWSP. EDUCATION ASSOC and I normally (do, don't) secure work through them. I will travel by (bus, car, train, walk) to a job and would like no more than a 20 minute travel but would consider up to a 40 minute travel. My job contact form (is, is not ) filled out.
9. Please list any facts or details not given above that might explain items above (1) DISABILITY LIMITS MY ABILITY TO WORK ON LATE OR CHANGING SHIFTS. (2) THIS IS THE PAY FOR THE JOB TO WHICH I AM ENTITLED. - EMPLOYER HAS REFUSED REASONABLE ACCOMODATION ACCEPTANCE OF REDUCED PAY AND DISCRIMINATORY TREATMENT WOULD VIOLATE MY RIGHTS.

DO NOT WRITE BELOW (Claimant's additional statements to be completed by Claims Examiner)

I would only accept a job if I get a Math/Sci. position at 1/2 time. I regret this decision but I am subject to layoff each year and would lose seniority. If there is a job within 1 year I could switch to it as I have the needed qualifications. I cannot work at 1/2 time with layoff this year.

C

NOTE

I certify that these statements are true to the best of my knowledge and I am aware that there are penalties provided for making false statements.

Signature [signature] B Date 10-8-92

DO NOT WRITE ON THE BACK OF THIS FORM. THE REVERSE WILL BE COMPLETED BY THE EXAMINER AT THE INTERVIEW

DL-2

BC-38W (R-6-92) New Jersey Department of Labor - Division of Programs - Unemployment and Disability Insurance Services

9500430700

## FACT FINDING FOR AVAILABILITY (Continued)

During the period for which benefits are being claimed, was the claimant under any of the following restrictions: (Explain in Item A Below)

Attendance at School or Training Course - (name, school and type course; completion date; hours)
Domestic Responsibilities - (child-care-ages; arrangements for care; impact on availability)
Health - (type of illness or injury; doctor's name; dates; past history; ability to work at what)
Incarceration or Detention - (duration; type of probation; impact on availability)
Leave of Absence or Vacation - (reason; voluntary or involuntary; dates; with or without pay)
Public Service, Jury Duty - (period; on panel or active duty; excuse to accept work)
Receipt of Other Payments - (nature, amount, date, duration; retirement, type; disability, work)
Self-Employment, Other Work - (type); Hours; availability for full time work; incorporation; officers)
Distance to Work - (distance; time; cost; average for industry; work in area; work history; mode)
Efforts or Willingness to Work - (work search; recall; work prospects; restrictions; mode)
Time, Part or Full - (hours sought; cause for restriction; claim based P/T; P/T work available; able to earn WBR)
Union Relations - (membership in; union shop; work only thru union; usual in industry; restriction)
Wages - (usual for work sought; length of employment and locality of wage; time unemployed)
Work - (restrictions; reasonableness; restrict to certain employers or industry; prospect of work)
Working Conditions - (restrictions; customary for industry; flexibility; work sought)
Personal Matters - (type and duration; impact on availability; reasonableness of actions)

CIRCLED ITEMS

A

I sought work as shown on my job search record. ☐ Yes ☐ No (____ places are verifiable)

A. Claimant's additional availability statements to be completed by Claims Examiner, if needed. _____

*Claimant signature* _____ *Date* _____

B. Additional statement by: Name _____ Title _____

Received by: Phone _____, Correspondence _____, Personal Contact _____, Date _____

B

C. I have had the opportunity to review the statement or information made to the Office by _____

I (agree) (do not agree) with all or part of it, and (desire to make the following statement) (do not desire to make a statement):

*Claimant signature* _____ *Date* _____

D. Claims Examiner Comments:

Is claimant able, available and actively seeking work ☐ Yes ☐ No

NOTE C

COMMENTS: Det with ind - see BC 5-6-3

D

NOTE

*Claims Examiner signature* M. Kamas *Date* 10 28 *Issue* AA DL-3

9504370037 1

# FACT FINDING RECORD FOR REFUSAL OF SUITABLE WORK

Local Office Stamp: Unemployment Insurance Service
347 Maple Street 951
Perth Amboy, New Jersey 08861-4198

NAME: Edward Rosenwald PC 10 DOC 6-289-0 SSN: 150-42-1424

NOTICE: YOU MAY NOT BE ENTITLED TO BENEFITS BECAUSE YOU MAY HAVE REFUSED SUITABLE WORK. FOR A PROMPT DETERMINATION ON YOUR CLAIM, PLEASE ANSWER QUESTIONS 1 THROUGH 13 BELOW.

| | (A) EMPLOYER CLAIM BASED ON | (B) LAST EMPLOYER OR EMPLOYER WITH WHOM YOU REFUSED WORK |
|---|---|---|
| 1. Name of Company: | EDISON BOARD OF EDUCATION | EDISON BOARD OF EDUCATION |
| Address of Company: | 100 MUNICIPAL BLVD. EDISON, N.J. | 100 MUNICIPAL BLVD. EDISON, NJ |
| 2. Dates of employment: | From: FEB 1974 To: JUNE 1992 | From: FEB. 1974 To: JUNE 1992 |
| 3. What was your rate of pay? | $ 1,100 per 2 WEEK | $ 1,450 per WEEK |
| 4. What hours and days? | Hours: 8:00-2:25 Days: M-F | Hours: 7:45-3:15 Days: |
| 5. What kind of work did you do? | TEACHER (HIGH SCHOOL) | TEACHER (MIDDLE SCHOOL) |

6. Why did you leave or refuse job 5? (Please write ALL reasons in detail)
I HAVE NOT REFUSED ANY JOB. EMPLOYER HAS REFUSED TO GRANT REASONABLE ACCOMINDATION DESPITE PREVIOUS PRACTICE. EMPLOYER HAS ACTIVELY CHOSEN TO NOMINATE AND COERCE ME INTO ACCEPTING A VIOLATION OF MY RIGHTS

7. Did you notify your employer that you were leaving or refusing the job? ☐ Yes ☒ No
If yes, by what method? (In person, letter, phone, etc.) LETTER ACCEPTING JOB. Date AUG 12 1992
Did you try to preserve your job by discussing your reasons for leaving with the employer beforehand? ☒ Yes ☐ No
If yes, with whom? LORENE MOORE PERSONNEL DIRECTOR Date AUG 18 TH & SEPT

8. Was there any change in your duties, work location, hours, pay, or safety which caused you to leave? ☒ Yes ☐ No
(If Yes, explain in Item 13).

9. If your leaving or refusal was due to health reasons answer the following questions:
A. What was the nature of the health problem? DISABILITY. NARCOLEPSY. DIABETES.
B. Was your illness or injury caused by or made worse by the job? ☒ Yes ☐ No (If Yes, explain in Item 13)
C. Do you have a doctor's statement showing that the health problem was related to the job? ☒ Yes ☐ No
(If Yes, bring this doctor's statement to the interview).

10. Did your employer take any actions to encourage you to leave or refuse the job? ☒ Yes ☐ No (If yes, explain in Item 13)

11. Have you moved in the past year? ☐ Yes ☒ No (If Yes, what date?) _____

12. Do you have a definite promise of employment? ☐ Yes ☐ No
(If Yes, give employers Name and Address _____
Anticipated First Date of Work _____

13. Please write any facts or details not given above that might explain why you left your job. MOVED TO A JOB WHERE REASONABLE ACCOMINDATION WOULD NOT BE GRANTED. DOCTOR CERTIFIES THAT I CAN NOT WORK IN THAT POSITION WITHOUT ENDANGERING MYSELF. SOLUTION PROPOSED BY LORENE MOORE IS TO ACCEPT ANY REDUCTION, ACCEPT DISCRIMINATION IN SCHEDULING AND ACCEPT A FRAUDULENTLY DESCRIBED SCHEDULE.

DO NOT WRITE BELOW. (Claimant's additional statement to be completed by Claims Examiner)
Since September was a teacher for Edison Bd. of Ed from 2/1974 to 6-30-92, I worked at the Middle School. When I worked at the High School I received [illegible] maintaining the [illegible] & Annex) and Evaluations. This work out [illegible]

*I certify that these statements are true to the best of my knowledge and I am aware that there are penalties provided for making false statements.*

Signature Edward Rosenwald Date 11-26-92

DO NOT WRITE ON THE BACK OF THIS FORM. THE REVERSE WILL BE COMPLETED BY THE EXAMINER AT THE INTERVIEW

DL-4

**FACT FINDING RECORD FOR REFUSAL OF SUITABLE WORK (Continued)**
**(To Be Completed by Claims Examiner)**

A. During the period for which I am claiming benefits, I was ready, willing, able and available for work. I sought work as shown on my job search record. ☐ Yes ☐ No

(Claimant's additional availability statements to be completed by Claims Examiner, if needed) _____

_____

_____

_____

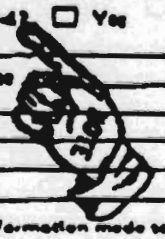
_____

*Claimant signature* _____ *Date* _____

B. Did employer give separation information on BC-2 or BC-4? ☐ Yes ☐ No (If yes, read to claimant)

Additional statement by: Name _____ Title _____

Received by: Phone _____, Correspondence _____, Personal contact _____, Date _____



_____

_____

_____

_____

I have had the opportunity to review the statement or information made to the Office by _____. _____ relative to this issue. I agree) (do not agree) with all or part of it, and (desire to make the following statement) (no not desire to make a statement: 985-40697-4100 - h2732 9:10 - Jean/Receptionist Personnel Mgmt's phone is busy. Will call her again. Call from Jean Mulman/Personnel Director/Contact Manager in Chicago + have three days to call back.

_____

*Claimant signature* _____ *Date* _____

C. Claims Examiner Comments:

Was claimant's leaving voluntary? ☐ Yes ☐ No Was leaving attributable to work? ☐ Yes ☐ No

If no, did a discharge take place? ☐ Yes ☐ No Was Misconduct involved? ☐ Yes ☐ No

Should issue be VQ rather than RSW? ☐ Yes ☐ No VQ with good cause? ☐ Yes ☐ No

Were reasons for leaving so substantial as to leave no reasonable alternative but to leave? ☐ Yes ☐ No

Were efforts undertaken to resolve the problems? ☐ Yes ☐ No

Was distance to job reasonable? _____ Was transportation available? _____ Cost reasonable? _____

Are domestic circumstances same as base employer? _____ More restrictions? _____

Does claimant supply own equipment? _____ Same as base employer? _____ Cost reasonable? _____

Does claimant have necessary skills? _____ Will employer train? _____ Salary while training? _____

Claimant too young or old for job? _____ Same work as base employer? _____ Physically able? _____

Medical Problem? _____ Related to this job or industry? _____ Evident during base employment? _____

Hours and days same as base employer? _____ Hours legal? _____ Restricted to specific hours? _____

Union? _____ Have to join? _____ Same as base employer? _____ Jeopardize current union membership? _____

Job available due to labor dispute? _____ Would claimant have to cross picket-line? _____

Wages near base employer? _____ Near prevailing rate? _____ Reasonable? _____ Calculated same way? _____

Refused this job before? _____ Ruled good cause? _____ Other work preferred? _____ Reasonable? _____

Working conditions reasonable? _____ Standard for industry? _____ Same as base employer? _____

Job offer actually made? _____ Refused referral? _____ Refused to report to employer? _____

Hired but didn't show up? _____ Not hired because employer felt claimant didn't want to work? _____

Does claimant have another bona-fide job offer? _____ Will claimant accept? _____ Better offer? _____

Is claimant able, available and actively seeking work? ☐ Yes ☐ No

**COMMENTS:** out diary - see BC-4

_____

_____

_____

_____

_____

_____

*Claims Examiner signature* M Lewis *Date* 10/28 *Issues* RSW.

PL-5

_____

_____

P.1

JUL 02 '93 09:09 DOL-UI/DI-LOB9S1

9504370033

LOCAL OFFICE ADDRESS AND NUMBER
Unemployment Insurance Service
357 Main Street
Park Amboy, New Jersey 08861-4195
201-826-3400

NJ-BEA (R-1-92)
State of New Jersey
Department of Labor
DIVISION OF PROGRAMS
Unemployment and Disability Insurance Service

**RECORD OF CLAIM INTERVIEW AND DETERMINATION**

SOCIAL SECURITY ACCT. NO. 150-42-1424
NAME OF CLAIMANT E. Benard
FIRST DAY OF BENEFIT YEAR 62892 Prog. Code N
DATE SIGNED 10279 2

SOURCE OF REFERRAL:

STATEMENT OF CLAIMANT: macular degeneration is a disability. I can fall asleep at anytime if I do not have a sufficient break after so many hours to nap. I've had this condition since 1984, it is not treatable or curable. It is something I have to live with. My immediate supervisor was well aware of my medical conditions. This year I was offered a contract to work in the middle school, where all teachers in middle school receive one break in the afternoon for one period. I would not receive a break from the start of school at 7:45 to lunch time, which I would give me a 26 minute break, then my afternoon break would start at 1:30. (I would nap for my)
When I consented my medical condition to Lorene Moore/Dir. of Personnel. she requested a Dr. Note. My Dr. was on vacation so I brought the note on 9-2-92. I did not sign any contract for the 92/93 year. A meeting was then arranged for

Jul 02 '93 09:06 DOL-UI/DI-L0951 P.2

I AM TENURED TEACHER 2015

DL-6

9504370034

STATEMENT OF CLAIMANT (CONT'D): Came To meet with Lorena Moore & Myn. Flum/Supervisor of Industrial Arts. Mr. Flum Told. that they were not going To accomodate me with any means of flexibility To give me the Increased need. They did say they would eliminate one of my classes but decrease my salary by .15%. I was earning $44, over the Hights, this. I refused this offer because I should be making $58, over per centrant. This would have been a decrease of $8,700.00 yearly salary.

X Edward Ramp.

STATEMENT OF EMPLOYER OR OTHER:

FURTHER STATEMENT OR REBUTTAL OF CLAIMANT/EMPLOYER:

COMMENTS OF CLAIMS EXAMINER: (Summary of Facts)

Dist disq - see 3463 87.50

(Reason)

(Legal Result)

I certify that the statements made by me herein are true. I realize that the Law provides penalties for making false statements to obtain benefits.

Claimant's Signature X Edward Ramp

Claims Examiner's Signature M. Rivas (Deputy)

ISSUE(S) RESOLVED (In order of importance)

RS W

JUL 02 '93 09:07 DOL-UI/DI-L0895I

DL-7

LOCAL OFFICE ADDRESS AND NUMBER

Unemployment Insurance Service
347 Main [illegible] 951
Perth [illegible] New Jersey 08861-4192

State of New Jersey
Department of Labor
DIVISION OF PROGRAMS
Unemployment and Disability Insurance Service

**RECORD OF CLAIM INTERVIEW AND DETERMINATION**

SOCIAL SECURITY ACCT. NO. 150-42-1424

NAME OF CLAIMANT E. Renaud.

FIRST DAY OF BENEFIT YEAR 6-2-92 | PROG. CODE 72

DATE SIGNED 10-29-92

SOURCE OF REFERRAL:

STATEMENT OF CLAIMANT: Employer base - called from Joan Mulnaw.
Ebenaud was a teacher in the The High School
since 1974. He was absent since 5/92. He was
earning $53,360.00. He did receive a breakin
the am & pm. There was never anything
in writing stating he had any disabilities.
In late august of this year he was offered
a long term substitute assignment from 9-1-92
To 10-31-92, then take over as a permanent teacher
upon the retirement of another teacher at the
Agamin high school. This job would
pay him a salary of $56,561.00 At first he
refused the offer because he at that time
told us he had a sleeping disorder. He needed
a law an accomodation to have a break
in the morning & afternoon, but while the
Jr. school did not have morning breaks.
He was then asked To get a Dr's note To
this effect which he did. On 9-15-92 we
accomodated him To allow him a 46 min break.

JUL 02 '93 09:10 DOL-UI/DI-L0#951 P.2

DL-8

STATEMENT OF CLAIMANT (CONT'D): but the can, a 26 min break for lunch & another 46 min break in the p.m.
* He refused the offer once again & stated that his Dr. does not recommend taking things.

STATEMENT OF EMPLOYER OR OTHER:
I did accept the job & asked for reasonable accomodations after I was accumulated & refused because of a decrease in salary of 15% & also it was not a reasonable accomodation because I would get a 26 minute break for lunch at what time I would have to map & then take paid 5 & 6 & eliminate period 7 which I would get a break, but that the end of the actual day for me would be after period 6.

FURTHER STATEMENT OR REBUTTAL OF CLAIMANT/EMPLOYER:

COMMENTS OF CLAIMS EXAMINER: (Summary of Facts)
Ref disq - see BC069

(Reason)

(Legal Result)

I certify that the statements made by me herein are true. I realize that the Law provides penalties for making false statements to obtain benefits.

Claimant's Signature

Claims Examiner's Signature (Deputy)

ISSUE(S) RESOLVED (In order of importance)
RSW

950437070

JUL 02 '93 09:11 DOL-UI/DI-L09951 P.1

Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718
908 495-2531

February 9, 1993

Cornelia Calderone
Board of Review
Dept. of Labor
CN 937
Trenton, N.J. 08625-0937

Dear Ms. Calderone,

I have been referred to you by Mr. Ronald Gitter to obtain transcripts of my appeals hearing. My need for the transcripts arose because my case is being reassigned to a Monmouth County attorney whose location will ease problems caused by my having a neurological disability and that disability sometimes makes it difficult to remember difficult to accurately recall events under certain circumstances.

I have worked since 1984 with this disability and have only recently been put in a situation where I have had to make use of Unemployment Services for such an extended period. Since I have not been able to finish my appeal I am concerned that my new attorney when assigned will be adequately prepared to represent me. I have been without benefits since the week ending 9-12-92. I am sure you can understand my concern and I appreciate your help. Attached is my latest Notice of Postponement.

Sincerely,

Edward Renaud

cc: file

9504370078

DL-20

J.L.

D-1

REINARD
E.D.

AUGUST 13, 1992
508 FOX AVE.
BELFORD, N.J 07718

EXHIBIT D-1

INQUIRY NUMBER 92A-29190-00041

APPEALS EXAMINER KONAKOWITZ

TO: LORENE W. MOORE
DIRECTOR OF PERSONNEL

I AM PLEASED TO ACCEPT A POSITION WITH THE PUBLIC SCHOOLS OF EDISON TOWNSHIP AS A INDUSTRIAL ARTS TEACHER.

I HAVE PREVIOUSLY INFORMED MY SUPERVISOR MR. FLOR THAT A RE-ASSIGNMENT TO A MIDDLE SCHOOL POSITION INDICATES A FAILURE ON THE PART OF THE EDISON SCHOOL SYSTEM TO GRANT ME REASONABLE ACCOMIDATION AS A DISABLED EMPLOYE AS REQUIRED BY THE AMERICANS WITH DISABILITIES ACT.

THE EDISON SCHOOL SYSTEM HAS BEEN AWARE OF THE SPECIFIC REQUIREMENTS CAUSED BY MY DISABILITY AND HAS MADE ACCOMIDATION IN THE PAST. IT IS OBVIOUS THAT THE SCHEDULE OF THE MIDDLE SCHOOLS CANNOT BE ARRANGED TO ALLOW ME TO SLEEP AT THE INTERVALS REQUIRED; THE HIGH SCHOOL SCHEDULE ALLOWS THIS ACCOMIDATION AND HAS BEEN ARRANGED TO ALLOW ME TO CONTINUE MY EMPLOYMENT DESPITE MY DISABILITY.

PLEASE BE ADVISED THAT THIS REQUEST FOR REASONABLE ACCOMIDATION ADDRESSES ONLY THE IMMEDIATE PROBLEM OF DEALING WITH MY DISABILITY REGARDING A SPECIFIC SYMPTOM OF NARCOLEPSY. RESOLUTION OF THIS FAILURE ON THE PART OF THE SCHOOL SYSTEM TO PROVIDE REASONABLE ACCOMIDATION CAN BEST BE RESOLVED BY MEETING WITH ME SO THAT I MAY MAKE CLEAR THE RANGE OF MY DISABILITIES AND THE ACCOMIDATIONS THAT MAY BE REQUIRED.

IT HAS BEEN MADE CLEAR TO ME IN BOTH MY CONVERSATIONS WITH MR. FLOR AND IN COMMUNICATION WITH YOU BY PHONE ON AUGUST 13, 1992 THAT THE EDISON SCHOOL SYSTEM HAS NO INTENT OF GRANTING REASONABLE ACCOMIDATION TO ME AS A DISABLED PERSON. I WOULD HOPE THAT WHAT APPEARS TO BE POLICY OF REFUSAL TO GRANT REASONABLE ACCOMIDATION WOULD BE RECONSIDERED BEFORE THE OPENING OF SCHOOL IN SEPTEMBER. I HAVE BEEN ADVISED OF MY RIGHT TO

9504370031/9

FILE A COMPLAINT UNDER THE AMERICANS WITH DISABILITIES ACT BY THE DISTRICT INFORMATION OFFICE. REGARDING THE EDISON SCHOOL SYSTEM'S FAILURE TO PROVIDE REASONABLE ACCOMIDATION. SPECIFIC ISSUES THAT WERE DISCUSSED INCLUDED:

1. REFUSAL ON THE PART OF THE EDISON SCHOOL SYSTEM TO ACCOMIDATE ME BY REMOVING ME FROM A POSITION AT EDISON HIGH SCHOOL AND REFUSAL TO RETURN ME TO THAT POSITION WHERE I HAVE TAUGHT SUCCESSFULLY FOR YEARS AS A DISABLED PERSON.
2. THE PROPOSAL BY MR. FLOR THAT THE SCHOOL BOARD WOULD POSSIBLY CHOSE TO FORCE ME TO RETIRE

BOTH OF THE ABOVE SITUATIONS ARE GROUNDS FOR ME TO FILE WITH THE E.E.O.C.. THE PURPOSE OF THE AMERICANS WITH DISABILITIES ACT IS TO PROTECT EMPLOYMENT RIGHTS. AND I WILL NOT ACCEPT DENIAL OF MY RIGHT TO WORK AS A DISABLED PERSON, NOR WILL I ACCEPT ANY LOSS OF BENEFITS OR COMPENSATION CAUSED BY FAILURE OF THE EDISON SCHOOL SYSTEM TO COMPLY WITH THE LAW.

I HAVE INCLUDED A COPY OF THE NARCOLEPSY FACT SHEET, ADDITIONAL INFORMATION CAN BE OBTAINED FROM THE NARCOLEPSY ASSOCIATION. AS AN ACTIVE MEMBER OF THE ASSOCIATION I CAN PROVIDE ADDITIONAL INFORMATION SPECIFIC TO MY EXPERIENCE WITH THIS DISABILITY

AGAIN, I WILL EXPECT THAT THIS SITUATION WILL BE RESOLVED BEFORE THE OPENING OF SCHOOL FOR THE 1992-1993 YEAR

SINCERELY.
Edward Renard.

DL-36

9504370,30

D-2

September 2, 1992

Michael D. Goldman, M.D., Sc.D.
Cardiopulmonary Researcher

OCT-20-

Lorene W. Moore, Director of Personnel
Public Schools of Edison Township
100 Municipal Boulevard
Edison, NJ 08817

VIA FAX #908-287-4955

*Re: EDWARD RENAUD*

Dear Ms. Moore:

Mr. Edward Renaud has been under my care for treatment of narcolepsy since November 1984. As you know, Mr. Renaud's medical condition, called narcolepsy, is a disability. However, with reasonable accommodations, Mr. Renaud functions very well. He has, as I am sure you are aware, done an outstanding job as a high school teacher when his schedule allowed him to take regularly scheduled breaks with naps. It is absolutely necessary that Mr. Renaud be allowed to continue to have the same accommodations as he had in the past so that he can continue to perform his teaching duties.

If Mr. Renaud cannot take frequent regular breaks with naps, he will fall asleep at inappropriate times, and when he tries to avoid this, he will develop automatic behavior. This could be dangerous to himself and possibly others. I have insisted that Mr. Renaud not return to work until his previous working conditions have been reinstated because I am concerned for his health and safety.

Sincerely,

June M. Fry, M.D., Ph.D.
Director
Sleep Disorders Center

JMF/gjs

950437000381

EXHIBIT D-2

DOCKET NUMBER D-A-77/91-011-10

ALS EXAMINER RONALD GEPPI

DL-37

# Public Schools of Edison Township

100 Municipal Boulevard • Edison, New Jersey 08817

Tel: (908) 287-4400 Fax: (908) 287-4955

RONALD R. CASTALDO
ASSISTANT SUPERINTENDENT

DR. JOSEPH A. KINSKEY
SUPERINTENDENT

DANIEL P. MICHALO
BUSINESS ADMINISTRATOR BOARD SECRETARY


September 15, 1992

EXHIBIT Emp-1

DOCKET NUMBER PA 29190-00XO

APPEALS EXAMINER RONALD GIFFORD

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

In response to your request on August 13, 1992 that we accomodate your disability, as specified by your doctor, I am pleased to inform you that the original schedule has been adjusted to meet your disability limitations.

Since you were recalled from the Reduction-in-Force List, your entitlement as a teacher is to the first Industrial Arts position that becomes available. Because of the unexpected retirement of one of our staff members at Woodrow Wilson Middle School, we are able to bring you back into this position.

Mr. Donald Flor has indicated that your schedule has been adjusted to include the following:

| | |
|---|---|
| Periods 1 & 2 | - Teaching periods |
| Period 3 | - Duty free |
| Period 4 | - Teaching period followed by a 26-minute lunch/rest break |
| Period 5 & 6 | - Teaching period |
| Period 7 | - Assigned to another Industrial Arts Teacher |

We have adjusted this schedule to make it comparable to the schedule you previously worked under at the Edison High School. Instead of a 1.0 position, however, it is a .85. Your past assignment was that of a .80.

Hopefully, this schedule will meet your needs. Please contact my office, letting me know your immediate plans, as staffing this position requires our immediate attention.

Respectfully,

Lorene W. Moore

LORENE W. MOORE
Director of Personnel

LWM/jm

cc: D. Flor
J. Gundry

*Nothing Less Than Excellence*

DL-38

SEP 20 1984

# Herman & Anayiotos Neurology, P.A.


Martin K. Herman, M.D.
Chris P. Anayiotos, M.D.
Diplomates, American Board of Psychiatry and Neurology
Paul Gennaro, M.D.

170 MORRIS AVENUE
LONG BRANCH, NEW JERSEY 07740
(201) 222-6238

130 MAPLE AVENUE
COURTS OF RED BANK
RED BANK, NEW JERSEY 07701
(201) 741-2227


9/17/84

To whom it may concern:

Edward Renaud is being treated by me for narcolepsy and is cleared to work as long as he takes his medications and his narcolepsy remains under good control.

Paul Gennaro MD

EXHIBIT Grf-2[3]

DOCKET NUMBER 92-A-7919D-0004

APPEALS EXAMINER KONDRATIEFF

DL-39


950437/00383

...EDICAL
COLLEGE
HOSPITALS

Sleep Disorders Center
Department of Neurology

Main Clinical Campus

3200 Henry Avenue
Philadelphia, PA 19129
Telephone (215) 842-4250

June M. Fry, M.D., Ph.D.
Director
Mark A. DiPhillips, R.Psg.T.
Technical Director and
Clinical Coordinator
Lawrence W. Brown, M.D.
Pediatric Clinical Director
Rochelle Goldberg, M.D.
Cardiopulmonary Clinical Director
Michael D. Goldman, M.D., Sc.D
Cardiopulmonary Researcher

November 11, 1992

Loren W. Moore, Director of Personnel
Public Schools of Edison Township
100 Municipal Boulevard
Edison, NJ 08817

**RE: Edward Renaud**

Dear Ms. Moore,

As you know Mr. Edward Renaud is under my care for treatment of narcolepsy. As I mentioned in my previous letter his narcolepsy is a handicap but with reasonable accommodations Mr. Renaud is able to function quite well. His ability to function includes the fact that he is very familiar with the course work that he has developed and taught over the past several years. A change in his schedule with new courses that he has never taught before would result in a stress that would adversely affect his health. At this time it would be too strenuous and difficult for him to learn new courses and develop new course material. If Mr. Renaud continues to teach the same courses under his previous working conditions with the reasonable accommodations that he requires, he will be able to continue to perform the required duties.

Sincerely,

June M. Fry, M.D., Ph.D.
Director

JMF/cpm

EXHIBIT CWT-1
DOCKET NUMBER 92A-79190-OHF
APPEALS EXAMINER RONACHER

DL-40

950430/000364

# THE AMERICAN NARCOLEPSY ASSOCIATION

*"Ignorance Is Our Enemy, Information Our Most Powerful Weapon"*

The American Narcolepsy Association (ANA) was founded by individuals afflicted with narcolepsy. It is an independent, not-for-profit, charitable corporation established in 1975 to help solve the many problems associated with narcolepsy and related sleep disorders.

Although the symptoms of narcolepsy can be diagnosed with ease, both public and medical awareness are so inadequate that incorrect diagnosis, inappropriate, and sometimes dangerous treatments are tragically common. Typically, a person who is diagnosed as suffering from narcolepsy has lived with the symptoms for 10 to 15 years and has sought help from 3 to 5 doctors prior to the initial correct diagnosis! The symptoms are frequently dismissed as groundless complaints by friends, family members, and physicians alike.

Prior to diagnosis, narcolepsy is suspect as the cause of many symptom-related accidental deaths. Even after diagnosis, the symptoms continue to exert a crippling effect on learning, memory, attention, and motivation. They have a pervasive influence which robs life of quality and accomplishment. Obviously, narcolepsy is a major national health problem which merits far more attention (education and research) than it and its victims have received in the past.

The ANA distributes information about narcolepsy and related sleep disorders to members of the general public and medical professions, and to individual victims of these sleep disorders. The distribution of this information helps doctors recognize the symptoms and helps those who suffer from these sleep disorders to better understand and cope with the symptoms.

The ANA encourages the conduct of research such as that seeking early diagnosis, better understanding, improved treatment and/or cures for sleep disorders. We support such research through volunteer work, direct funding, fund raising assistance, and by providing evidence of the importance and need for such research.

ANA research involvements include the origination and conduct of small scale projects such as surveys of our members regarding their opinions, experiences, and needs. In addition, we help secure volunteers (both afflicted and control subjects) to participate in research projects conducted by others.

The MEDICAL ADVISORS to the ANA are widely recognized as being among the leading authorities in the field of sleep disorders. Working closely with these Advisors, we have prepared non-technical information brochures such as *Narcolepsy: A Non Medical Presentation* and *Sleep Apnea: A Non-Technical Presentation* to help those who do not have a medical background better understand these disorders (free copies are available upon request).

Among the ANA ACTIVITIES found to be of greatest interest to our members are: the formation and conduct of Group Self-Help Meetings, the identification of diagnostic facilities (in cooperation with the Association of Sleep Disorders Centers) and physicians in various locales who are informed in the field and interested in the diagnosis and treatment of sleep disorders. Information about these and other ANA activities and services is communicated to the membership via our newsletter (The "Eye Opener"), the American Narcolepsy Journal, and unscheduled letters on special topics as the need arises.

Each of the DIRECTORS of the ANA has been diagnosed as having narcolepsy. They understand many of the problems from personal experience and recognize that only a person who has a sleep disorder really understands what it's like to live with symptoms which others cannot see.

***If you have a sleep disorder, we ask that you write to the Association and tell us about your experiences and problems so that we may continue to establish priorities which accurately reflect the current needs of everyone who suffers from a sleep disorder.***

MEMBERSHIP AND DONATIONS: All interested individuals are encouraged to become members of the ANA and a membership application will be sent upon request. One need not have a sleep disorder to join. We have members and membership activities in every State and the majority of the work is done by unpaid volunteers. Our primary sources of financial support are membership dues and individual donation. Donations qualify as charitable contributions on Federal Tax returns. There is much that needs to be done and much that, together, we can accomplish.


**The American Narcolepsy Association, Inc.**

Box 5846

Stanford, California 94305


Note: there is no charge for any of the above mentioned information, however, several weeks often elapse between receipt of an information request and our response (depending on the availability of volunteer workers and the number of requests received). Personal individual responses are sometimes delayed even longer and, in some instances, are impossible.

1.02B-1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DL-A1


950437/0885

Public Schools of Edison Township
100 Municipal Boulevard, Edison, New Jersey 08817
Tel: (908) 287-4400 Fax: (908) 287-4955

Dr. Joseph A. Kreskey
Superintendent

Daniel P. Michaud
Business Administrator/Board Secretary

EXHIBIT CGT-3

92A-79196 0000

ER Edward Renaud

January 22, 1993

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

Dear Mr. Renaud:

In response to your letter dated January 14, 1993, I would like to provide you with the following information:

1. It was my understanding that after your initial visit with Dr. DeCastro, she would refer you to Dr. Rieman, a neurologist. This is the standard operating procedure for all employees. Anyone who is sent to the Chief Medical Inspector, in order to be seen by a specialist, has to go through the Chief Medical Inspector first.

2. My recollection of the conversation between us is slightly different from yours. I indicated to you that when you visited Dr. Rieman, it would not be necessary for you to bring in new records, that I would make certain that Dr. DeCastro transferred all of your records to Dr. Rieman.

   To date, it is my understanding that you have not made the appointment. Let me assure you that all records will be sent to the neurologist for his evaluation, whenever you see the doctor.

3. I assumed that you had medical and prescription cards, since you were not asked to return the ones originally in your possession. I have maintained your coverages on all of our insurance plans, medical, dental and prescription. Since I have received no correspondence from you since November, I assumed everything was in order.

Please be aware that the Board of Education is very interested in resolving this dilemna. I reiterate that your schedule will be accomodated in any manner you deem necessary. In addition, our Supervisor of Industrial Arts, Don Flor, will be available to assist you in your lessons, organization of your classes and in any area you deem necessary.

If I can be of further assistance, feel free to contact me.

Sincerely,

Lorene W. Moore

LORENE W. MOORE
Director of Personnel

LWM/jm

950437008887

PUBLIC SCHOOLS OF EDISON TOWNSHIP
OFFICE OF THE SUPERINTENDENT
100 Municipal Boulevard, Edison, New Jersey 08817

RETURN RECEIPT REQUESTED

CERTIFIED
P 814 378 350
MAIL

MR. EDWARD RENAU
508 Fox Avenue
Belford, N.J. 07

DL-43

The determination of the Deputy is reversed.

REOPENED : 10/18/93
HEARING : 10/18/93
DATED : 11/1/93
TYPED : 11/4/93
FA
RG/yr

/s/ Ronald Gitter
Appeals Examiner I

cc:
L.O. 951
EDWARD H RENAUD
EDISON TOWNSHIP BD OF ED
THOMAS CAVANAGH ESQ

IMPORTANT:

This decision will become final, unless, within ten days of the date of mailing, an appeal is filed with the Board of Review, Department of Labor, Labor Building, CN 937, Trenton, New Jersey 08625-0937. Please specify the reasons for your appeal.

IMPORTANTE:

Esta decisión será final, a menos, que en dien dias desde la fecha de envio, una apelaión dea llenada al panel de revisión (The Board of Review, Department of Labor, Labor Building, CN 937, Trenton, New Jersey 08625-0937)

9504370068

White - Appeal Tribunal; Canary - Local
Pink - Claimant; Goldenrod - Employer

AT-4 (8-8-88)
State of New Jersey
Department of Labor
DIVISION OF PROGRAMS
UNEMPLOYMENT AND DISABILITY INSURANCE SERVICES

FOR OFFICIAL OFFICE USE

4

11-4-93

FILED: 11-15-93

93BO07907-000X0

NOTICE OF APPEAL BY

☐ Claimant ☒ Employer ☐ Deputy

Claimant: Edward H Renaud

Address:

City:

New Address: (Effective Date _____ )

City:

SOCIAL SECURITY NUMBER: 150 | 42 | 1424

| DATE OF CLAIM | DATE OF APPEAL | L.O. NO. |
|---|---|---|
| 6/28/93 | | 957 |

| DETERMINATION APPEALED | DATE MAILED | DATE DELIVERED |
|---|---|---|
| | | |

| DECISION APPEALED | DATE MAILED | DOCKET NO. |
|---|---|---|
| | | 92-A-7[illegible] 000-10 |

☐ Non-covered Base Year Employer ☐ Benefit Year Employer
☐ Last covered Base Year Employer

1. Employer: Edison Township Bd of Ed
Address: C/o NEC
City: P.O. Box 4816
State: Syracuse NY Zip: 13221-4816

Appellant's Attorney or Agent: NEC
Address: P.O. Box 4816
City: Syracuse
State: NY Zip: 13221-4816

2. Employer: Address: City:

I appeal from:
☐ Determination of Local Claims Office - Form BC-
☐ Determination of Bureau of Unemployment Benefits – Form B-
☒ Decision of Appeal Tribunal
☐ Other Determination - Form Number

| PROG. CODE | FLAG CODE |
|---|---|
| | |

NOTE: YOU MUST STATE SPECIFICALLY AND IN DETAIL THE REASONS FOR YOUR APPEAL
(USE REVERSE SIDE, IF NECESSARY)

We wish to reopen the above referenced case as the Employer and Employers representative never received notice of hearing. Please re-open, Please appeal.

A HEARING WILL BE SCHEDULED WHICH WILL COVER THE DETERMINATION APPEALED, AND MAY INCLUDE ANY OTHER MATTERS AFFECTING THE CLAIMANT'S RIGHT TO BENEFITS UP TO THE TIME OF THE HEARING. If the decision of the Appeals Examiner reverses a previous determination which allowed benefits to the claimant, the claimant may be required to refund the benefits paid during a period of disqualification or ineligibility.

I have been instructed and understand that, while unemployed and claiming benefits, I must continue to mail in my mail claim forms pending a decision on this appeal.

Kit Balcom 11/15/93
Signature of Appellant or Agent Date

AUTHORIZED AGENT - RESPOND TO-
Natl. Employers Council, Inc.
Box 4816, Syracuse, N.Y. 13221-4816
(315) 471-2627

P50437008889

CHAMLIN, ROSEN, CAVANAGH & ULIA
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
208 NORWOOD AVENUE
P.O. BOX 38
WEST LONG BRANCH, N.J. 07764
(908) 229-3200

GEORGE M. CHAMLIN
CERTIFIED CIVIL TRIAL ATTORNEY
RONALD B. ROSEN
CERTIFIED CIVIL TRIAL ATTORNEY
FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
THOMAS W. CAVANAGH, JR.
N.J., N.Y. & D.C. BARS
CHARLES J. ULIANO
CERTIFIED CIVIL & CRIMINAL TRIAL ATTORNEY
KENNETH W. CHAMLIN
N.J. & N.Y. BARS
SHARON LYNCH NORTON
N.J. & N.Y. BARS

ROBERT P. MCKEVITT
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
N.J. & PA. BARS

TELEFAX # (908) 571-8741

August 15, 1994

Mr. Ronald Gitter
Trenton Appeal Tribunal
22 S. Clinton Avenue
CN 380
Trenton, New Jersey 08625

Re: In the Matter of Edward Renaud
Docket No. 92-A-79190-000-X0
Our File No. 26089

Dear Mr. Gitter:

We are in receipt of notice of postponement in the above named matter. As we indicated to you in our letters of June 1, 1994 and July 8, 1994, this firm no longer represents Mr. Renaud in this proceeding.

By copy of this letter, I am forwarding a copy of the notice to Mr. Renaud.

Thank you for your courtesies in this matter.

Very truly yours,

THOMAS W. CAVANAGH, JR.

TWC/mmc
cc: Mr. Edward Renaud

950437002320

DL-64

TO THE BOARD OF REVIEW:

ATTACHED IS A AMENDMENT OF JAN. 9, 1995 ADDRESSED TO THE DIRECTOR OF THE DIVISION ON CIVIL RIGHTS WHICH WILL ALSO SERVE AS MY SUBMISSION TO THE BOARD OF REVIEW. THE AFFIDAVIT AND DOCUMENTS INCLUDED PROVIDE SUBSTANTIATION OF THE ALLEGATION OF CONSPIRACY TO OBSTRUCT MY RIGHTS AS A HANDICAPPED PERSON BY THE EDISON TOWNSHIP BOARD OF EDUCATION, THE EDISON TOWNSHIP EDUCATION ASSOCIATION AND ATTORNEYS PAID BY THE N.J.E.A.. THEIR INTEREST AND THAT OF THE ADDITIONAL PARTIES HAS BEEN TO CONCEAL VIOLATIONS OF STATE, FEDERAL AND CONSTITUTIONAL LAW DATING TO 1984.

I WOULD EXPECT THAT THE BOARD OF REVIEW WOULD HAVE PARTICULAR INTEREST IN THE FOLLOWING:

1. THAT THE COPIES OF THE TAPES THAT I RECEIVED OF THE DEC. 4, 1992 HEARING WERE ALTERED TO ABROGATE ONE OF THE ACTS OF PERJURY BY LORENE MOORE WHO REPRESENTED THE BOARD OF EDUCATION AT THAT HEARING. THEY WERE ALSO ALTERED TO REMOVE HEARING OFFICER MR. GITTER'S REPRIMANDING HER FOR LACK OF CREDIBILITY AND MS. MOORE'S TESTIMONY REGARDING THE BOARD OF EDUCATION'S ATTEMPT TO USE A FRAUDULENT SENIORITY LIST TO JUSTIFY A PUNITIVE TRANSFER TO A POSITION OUT OF MY AREA OF CERTIFICATION THAT WOULD HAVE ALSO DENIED ACCOMMODATION TO MY DISABILITIES.
2. THAT AT THE DEC 4, 1992 HEARING MR STEPHEN KLAUSNER CLAIMING TO REPRESENT MY INTERESTS AND DONALD UHLIG REPRESENTING THE BOARD OF EDUCATION SUBORN STATEMENTS OF PERJURY BY LORENE MOORE TO CONCEAL THE ACTUAL CONTENT OF DOCUMENTS AND CRIMINAL VIOLATIONS OF LAW.
3. THAT EACH OF THE DOCUMENTS ORIGINATED AND SUBMITTED BY THE BOARD OF EDUCATION ARE FRAUDULENT. THEY ARE DESIGNED SPECIFICALLY TO SUBSTANTIATE THE CLAIMS

OF THE BOARD OF EDUCATION THAT THEY HAVE ACTED WITHIN THE LAW WHEN IN FACT THEY HAD USED MY DISABLITIES AS A MEANS OF VIOLATING MY RIGHTS AS A TENURED TEACHER AND HAD SUSPENDED ME WITHOUT PAY OR DUE PROCESS IN VIOLATION OF MY CONSTITUTIONAL RIGHTS.

1. THAT THE BOARD OF EDUCATION HAS REFUSED TO APPEAR AT ANY OF THE HEARINGS SCHEDULED FOR THE PAST TWO YEARS AND HAS REPEATEDLY MADE FRAUDULENT STATEMENTS REGARDING THEIR FAILURE TO APPEAR.
5. THAT I HAVE HAD NO RIGHT TO DUE PROCESS AT ANY OF THE HEARINGS ON THIS MATTER. IN PREPARATION FOR THESE HEARINGS ATTORNEYS PAID BY THE N.J.E.A. REFUSED TO ASSIST ME AND SUBPOENA ANY WITNESS OR DOCUMENTS.
6. AT EACH OF THE HEARINGS WHERE THE N.J.E.A. PAID ATTORNEYS WERE NOT REPRESENTING ME THE HEARING OFFICER INVOLVED REFUSED TO ALLOW ME TO SUBPOENA ANY WITNESS OR DOCUMENTS. IN VIOLATION OF MY CONSTITUTIONAL RIGHT TO DUE PROCESS AND EQUAL PROTECTION UNDER THE LAW.

UNDER THE CIRCUMSTANCES I WILL EXPECT THAT THE BOARD OF REVIEW TO MAKE IT'S DECISION ON THE BASIS OF THE ACTUAL FACTS OF THIS DISPUTE; THAT THE BOARD OF EDUCATION AND AND EDISON TOWNSHIP EDUCATION HAVE BEEN ENGAGED IN A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS SINCE 1984. THEY HAVE PREDICATED THEIR ACTIONS SINCE THAT TIME ON FRAUDULENTLY CREATING CIRCUMSTANCES WHERE THEY WOULD ACT TOGETHER TO END MY EMPLOYMENT WITH THE SPECIFIC INTENT THAT THEY COULD CONCEAL CRIMINAL ACTIVITY, DENY ME A DISABILITY PENSION AND THE RIGHT TO ELECT TO CONTINUE MY MEDICAL BENEFITS AT GROUP COST AS STATE LAW MANDATES.

THEIR CORRUPT POLITICAL INFLUENCE HAS BEEN EXTENDED

950437002 92

THROUGHOUT STATE AND FEDERAL AGENCIES WHERE THEY HAVE ENTERED FRAUDULENT DOCUMENTS AND STATEMENTS IN EVERY JURISDICTION.

IN THEIR ACTIONS THEY HAVE MADE THE FALSE CLAIM THAT I HAVE "REFUSED SUITABLE WORK." WHEN THEY HAD USED A FRAUDULENT SENIORITY LIST TO JUSTIFY ASSIGNING ME BY PUNITIVE TRANSFER TO A TEACHING POSITION WHERE THEY REFUSED TO MEDIATE ANY ACCOMMODATION TO MY DISABILITIES. THEY BOARD OF EDUCATION HAD MALICIOUSLY AND INTENTIONALLY ACTED WITH THE N.J. E.A. ATTORNEYS TO IGNORE THE FACT THAT THE BOARD HAD BARRED ME FROM EMPLOYMENT BY VIOLATING N.J.S.A. 18A:6-10 AND SUSPENDING ME WITHOUT PAY OR DUE PROCESS BY REFUSING TO CONTINUE COST FREE ACCOMMODATION TO MY DISABILITIES.

THEIR CLAIM IS THAT I HAD "VOLUNTARILY LEFT WORK" WHEN THEY HAD REFUSED FROM SEPT. OF 1992 THRU OCT. OF 1993 TO ACCOMMODATE MY DISABILITIES AND ENGAGED IN A CRIMINAL AND CONSTITUTIONAL VIOLATION OF LAW TO CONCEAL THEIR INTENT OF ENDING MY EMPLOYMENT. THEY HAD OFFERED ONLY A POSITION THAT WAS A FRAUDULENT STATEMENT OF THE ACTUAL SCHEDULE OF MY TEACHING SCHEDULE WHICH WOULD ILLEGALLY REDUCE MY PAY, AGAIN VIOLATING MY RIGHTS UNDER N.J.SA. 18A:6-10 (SEE PAGE A-42)

THEY HAVE ALSO CLAIMED THAT I WAS "NOT AVAILABLE FOR WORK" WHICH WAS APPARENTLY ADDED TO THE OTHER FRAUDULENT CLAIMS TO ASSURE THAT THEY WOULD HAVE GROUNDS FOR PERMANENTLY DENYING ME BENEFIT PAYMENTS. IT IS MY UNDERSTANDING OF THAT STATEMENT DENYING ME BENEFITS THAT BECAUSE I AM HANDICAPPED THAT I CANNOT OBTAIN BENEFITS UNTIL I DO NOT HAVE RESTRICTIONS ON MY HOURS THAT I CAN WORK THAT ARE CAUSED BY MY HANDICAPS. IN EFFECT I CANNOT OBTAIN BENEFITS UNTIL I AM CURED OF MY DISABILITIES. TO MY KNOWLEDGE THERE IS NO CURE FOR NARCOLEPSY OR DIABETES PRESENTLY AVAILABLE. IN RELATION

TO THAT DENIAL OF BENEFITS IT IS MY UNDERSTANDING THAT THE BOARD OF EDUCATION HAS NO STANDING ON THAT ISSUE; THAT IT IS REPRESENTED AS A INDEPENDENT AND DISCRIMINATORY FINDING BY M. KOVACS, CLAIMS EXAMINER WHO HAD REFUSED TO ALLOW ME TO PROVIDED HER WITH ANY RELATED DOCUMENTS REGARDING MY DISABILITIES. HERE AGAIN THE BOARD OF EDUCATION HAS BEEN REPEATEDLY ALLOWED TO APPEAL THE DECISIONS OF THE APPEAL TRIBUNAL AND ARRANGE TO HAVE HEARINGS RESCHEDULED AS A MEANS OF HARASSMENT.

I WOULD EXPECT THAT THE BOARD OF REVIEW WOULD RECOGNIZE THE CRIMES OF CONSPIRACY AND RACKATEERING AND BRING THIS MATTER TO THE ATTENTION OF THE N.J. ATTORNEY GENERAL'S OFFICE FOR PROSECUTION OF THE INDIVIDUALS INVOLVED.

SINCERELY,

Edward Rennel

DL-11

To ROSALIE CRENZO, APPEAL TRIBUNAL,

I AM REQUESTING THAT YOU SUBPOENA THE FOLLOWING DOCUMENTS. FOR THE FEB. 13, 1995 HEARING.

1. ALL OF THE EMPLOYMENT RECORDS OF THE BOARD OF EDUCATION. RELATED TO MY EMPLOYMENT SINCE 1974.
2. THE SENIORITY LIST USED BY THE EDISON TOWNSHIP BOARD OF EDUCATION AND THE EDISON TOWNSHIP EDUCATION ASSOCIATION.
3. THE FINDING OF THE BOARD'S DOCTOR, VILLANUEVA DE CASTRO AND THAT DOCTOR IN HER POSITION AS CHIEF MEDICAL INSPECTOR.

AND THE FOLLOWING WITNESSES:

LORENE MOORE, PERSONNEL DIRECTOR
2 ARDSLEIGH CT.
MOUNT LAUREL, N.J.
08054
BOARD OF EDUCATION

DONALD UHLIG
DSU ASSOCIATES
241/245 HALEDON AVENUE
HALEDON, NEW JERSEY.
07508

M. KOVACS
CLAIMS EXAMINER
DEPARTMENT OF LABOR
339 MAPLE STREET
PERTH AMBOY, N.J. 08861-4192

EDISON TOWNSHIP EDUCATION ASSOCIATION
GUNDRY, John .....
office: 2 Ethel Road - Suite 203-A
Edison, NJ 08817

AND THESE BOARD OF EDUCATION EMPLOYEES.

VENTOLA,RALPH F
26 MANNY WAY
RED BANK, NJ 07701
EDH TECHNOLOGY

COE,JOHN
28 SHARRER ROAD
PORT MURRAY, NJ 07865
(908) 832-7456
DISTRICT SUPERVISOR-
RELATED ARTS

FLOR,DONALD
29 WILLIAMS ROAD
EDISON, NJ 08820
(908) 549-4956
JPH,JAM,WWM-RELATED ARTS

DR. JOSEPH KRESKEY.
CENTRAL ADMINISTRATION.
100 MUNICIPAL COMPLEX
EDISON, N.J. 08817

DL-81

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward Renaud
508 Fox Avenue
Belford, NJ 07718

March 30, 1995

RE: MUR 4196

Dear Mr. Renaud:

This letter acknowledges receipt on March 24, 1995, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 4196. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (HDS)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

9504370039 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 30, 1995

Sharon Lynch Norton, Esq.
Thomas W. Cavanagh, Esq.
Chamun, Rosen, Cavanagh and Uliano
268 Norwood Avenue, P.O. Box 38
West Long Branch, NJ 07764

RE: MUR 4196

Dear Ms. Norton and Mr. Cavanagh:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4196. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (MS)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 30, 1995

John E. Tully, Treasurer
Pallone for Congress
P.O. Box 3176, 540 Broadway
Long Branch, NJ 07740

RE: MUR 4196

Dear Mr. Tully:

The Federal Election Commission received a complaint which indicates that Pallone for Congress ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4196. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9504370039

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (MLT)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

cc: The Honorable Frank Pallone, Jr.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 30, 1995

Lawrence P. English, President
Connecticut General Life Insurance Company
900 Cottage Grove Road
Bloomfield, CT 06002

RE: MUR 4196

Dear Mr. English:

The Federal Election Commission received a complaint which indicates that Connecticut General Life Insurance Company may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4196. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Connecticut General Life Insurance Company in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L Taksar (#8)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9504370002

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 30, 1995

Stephen D. Bickel, President
The Variable Annuity Life Insurance Company
2929 Allen Pkwy.
Houston, TX 77019

RE: MUR 4196

Dear Mr. Bickel:

The Federal Election Commission received a complaint which indicates that The Variable Annuity Life Insurance Company may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4196. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against The Variable Annuity Life Insurance Company in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (MLT)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9504370090004

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 30, 1995

Robert Patin, President
Washington National Insurance Company
300 Tower Pkwy.
Lincolnshire, IL 60069-3665

RE: MUR 4196

Dear Mr. Patin:

The Federal Election Commission received a complaint which indicates that the Washington National Insurance Company may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4196. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Washington National Insurance Company in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (KBS)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9504370022 6

CHAMLIN, ROSEN, CAVANAGH & ULIANO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
268 NORWOOD AVENUE
P.O. BOX 38
WEST LONG BRANCH, N.J. 07764
(908) 229-3200

GEORGE M. CHAMLIN
CERTIFIED CIVIL TRIAL ATTORNEY
RONALD B. ROSEN
CERTIFIED CIVIL TRIAL ATTORNEY
FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
THOMAS W. CAVANAGH, JR.
(N.J., N.Y. & D.C. BARS)
CHARLES J. ULIANO
CERTIFIED CIVIL & CRIMINAL TRIAL ATTORNEY
KENNETH W. CHAMLIN
(N.J. & N.Y. BARS)
SHARON LYNCH NORTON
(N.J. & N.Y. BARS)

ROBERT P. McKEVITT
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
(N.J. & PA. BARS)

TELEFAX # (908) 571-8741

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
APR 7 2 13 PM '95

April 5, 1995

Ms. Alva E. Smith
Federal Election Commission
Central Enforcement Docket
Washington, D.C. 20463

Re: MUR 4196

Dear Ms. Smith:

Pursuant to our conversation of today's date, this will acknowledge that Mr. Cavanagh and myself have today, April 5, 1995, received correspondence from the Federal Election Commission dated March 30, 1995 regarding a complaint filed by Edward Renaud. In accordance with the pertinent regulations, we will submit a response to your office within 15 days of today's date.

Thank you for your courtesies in this matter.

Respectfully submitted,

Sharon Lynch Norton

SHARON LYNCH NORTON

SLN/mmc

9504370007

CHAMLIN, ROSEN, CAVANAGH & ULIANO
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KENNETH W. CHAMLIN
(N.J. & N.Y. BARS)
SHARON LYNCH NORTON
(N.J. & N.Y. BARS)

ROBERT P. McKEVITT
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
(N.J. & PA. BARS)

TELEFAX # (908) 571-8741

April 17, 1995

Apr 19 11 42 AM '95

Ms. Alva E. Smith
Office of General Counsel
999 E. Street N.W.
Washington, D.C. 20463

Re: MUR 4196 -- Sharon Lynch Norton
Thomas W. Cavanagh, Jr.

Dear Ms. Smith:

On April 5th, we received your letter of March 30th with accompanying attachments, and confirmed same with a facsimile transmission to you on that same date. Since the letter was addressed to us jointly, please accept this letter as a joint response to the above referenced complaint. We each certify the facts stated herein about which we have personal knowledge and have attached supporting documentation to corroborate our position.

We have reviewed the complaint dated March 20, 1995 and the documents attached thereto. Although the complainant concedes in paragraph 5 of his complaint that he cannot provide the Commission with a **single** document that establishes his claim or connects the conspiring parties, he alleges an underlying conspiracy which began in 1984 between the "originating parties", the Edison Township Board of Education and the Education Township Education Association. He then asserts a growth of that conspiracy to possibly include, but apparently not be limited to, the undersigned, two physicians, several other attorneys, a local pharmacy, a Roman Catholic priest, his private insurance carrier, the New Jersey Education Association, the Chairman or directors of the Middlesex Democratic Party, the State of New Jersey, federal agencies and a United States Congressman.

From what we can decipher, it appears that the gravamen of his complaint before the Commission against us charges that we conspired with certain or all of these individuals to conceal a criminal conspiracy against him related to his employment, during our legal representation of him in 1993

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and 1994. The essence of our activity, which is alleged to support his "circumstantial" presentation, is our refusal to pursue certain individuals and entities as criminal conspirators in a Federal District Court Complaint based upon alleged employment discrimination in violation of the Americans With Disabilities Act ("ADA"). Finally, he contends that, as the result of our "participation" in the alleged conspiracy, Congressman Frank Pallone was granted a political benefit by the Middlesex County Democratic Organization, which "allowed" him to run uncontested in the Spring, 1994 Congressional Primary in return for his role in the alleged conspiracy.

The allegations of the complaint are unsupported by any factual corroboration. In addition, they are belied and contradicted by evidence which demonstrates that our successful representation of Mr. Renaud was at all times guided solely by our professional and ethical judgment. The decisions made by us in connection with the handling of his case were in no way influenced or affected by any supposed agreement with Congressman Pallone or any of the other persons allegedly involved in the conspiracy in order to secure a political benefit for the Congressman or anyone else.

We will address each allegation of the complaint, but first, we wish to clarify the genesis of our representation of the complainant, the accomplishments that this office effectuated on his behalf, and the manner in which the relationship concluded.

Thomas W. Cavanagh, Jr. and Sharon Lynch Norton are members of the Monmouth County law firm of Chamlin, Rosen, Cavanagh & Uliano. The firm has been affiliated with the New Jersey Education Association ("NJEA") for many years, primarily through Mr. Cavanagh who currently serves as a network attorney for the organization. As a Monmouth County network NJEA firm, this office routinely handles labor disputes between teachers and their employers. Mrs. Norton is a litigation attorney in the area of employment discrimination, as well as in other areas of the law.

On or about February 2, 1993, Mr. Renaud first consulted with us concerning his employment situation with the Edison Township Board of Education. He advised us that he was represented by another NJEA network attorney, Stephen Klausner, who practises in Middlesex County, but he was apparently dissatisfied with his representation. Mr. Renaud concedes in his complaint, that at the initial meeting in

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our office, it was disclosed to him that we served as an NJEA network firm and he further describes in his presentation that he cooperated in the transfer of his file to this office by delivering it to us. He was at all times **aware** of the relationship this office maintained with the NJEA, and in fact acknowledged and accepted same, apparently in order to obtain indemnification for our legal services from that organization.

In his complaint, Mr. Renaud contends that another teacher in his system referred him to our firm. Later he also claims that this individual benefited from an alleged denial of Renaud's seniority rights. He contends that the initial referral by this teacher to our office was made with the insidious knowledge that we would ultimately conspire against complainant, together with Congressman Pallone and many others, in order to cause his rights to go unprotected.

It is difficult to address such a bizarre insinuation, which is totally unsubstantiated. Suffice it to say, at no time did either of us perceive Mr. Renaud's case as anything but a standard NJEA labor-related matter. The origin appeared to be the desire of a public employee to contest the loss of his position and obtain the restoration of that position, together with the recovery of any concomitant damages related to the severance. The referral to our office that he references, even if it actually occurred, played absolutely no role in the method and handling of his matter.

We agreed to represent Mr. Renaud for the purpose of seeking restoration of his teaching position with all reasonable accommodations to which he was entitled under the "ADA". With his full knowledge and approval, we were given the authorization to undertake his matter as substitute counsel for Mr. Klausner by the NJEA. It is pertinent to note that the description of services to be provided on the applicable NJEA form. It indicates that we were authorized to challenge the refusal of the Board to recognize his rights and seek restoration of his position under "ADA". *See* Exhibit A attached hereto.

A summary of the actions taken on behalf of Mr. Renaud during the course of our representation appear at length in a letter to the Honorable Dickinson R. Debevoise, U.S.D.J., which we have attached hereto as Exhibit B. Through meetings with the Edison Board attorney, the superintendent and others, we successfully secured Mr. Renaud's **reinstatement** to his former high school teacing position,

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with the **accommodation** he needed, beginning in September of 1993. This was accomplished **without waiver** of any claim for damages from the 1992-1993 school year, which we agreed would be perfected in Federal District Court pursuant to the "ADA". To that end, the Division of Civil Rights complaint that Mr. Renaud had personally filed, was transferred to the Equal Employment Opportunity Commission and a Request to Sue letter was obtained.

Mr. Renaud has charged that Mrs. Norton purposely engineered a delay of the receipt of the Right to Sue letter as part of the "plot" to violate his rights. Nothing could be further from the truth. Attached hereto as Exhibit C are no less than four letters evidencing Mrs. Norton's efforts to **expedite** the receipt of the Right to Sue letter. Mr. Renaud was fully aware of Mrs. Norton's efforts. His contrary allegation is patently **false** as are his other allegations of misconduct against the undersigned respondents.

In addition to securing his reinstatement with an accommodation, we successfully obtained a **reversal** of the denial of Renaud's State unemployment benefits. Mr. Renaud claims in his attachments that the tape of his original hearing was tampered with, apparently by the Department of Labor, to remove inculpatory evidence given by the Board witness. Mrs. Norton listened to the tape and could glean no evidence of tampering. In any event, we contested the denial, and were **successful** in the appeal on his behalf.

In late 1993, after returning to a teaching position as a result of our efforts, Mr. Renaud asserted that the Board wanted him removed from employment in Edison and that he did not trust anyone related to his employer. He also indicated that he suspected foul play regarding his prescriptions for narcolepsy for the reasons he sets forth in his complaint and attachments. When questioned by Mrs. Norton, respondent conceded that he could not document a **factual** basis for these fears. Having returned to work, he agreed with Mrs. Norton to perfect his lawsuit for damages on the "ADA" claim for the 1992-1993 school year.

Mrs. Norton drafted a complaint and met with Mr. Renaud late one evening in her office to review the draft. In the course of meeting, he appeared to Mrs. Norton to become increasingly agitated. He raised a litany of complaints as well as enumerating a lengthy list of defendants which were outside the discrimination claim and demanded that they be added to the complaint. He further ordered that we pursue

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in the complaint a conspiracy of a criminal nature to suppress his rights by a physician, the pharmacy, his local and state union, a private disability carrier and others, about which, as he now concedes, he had no evidence that would prove same at the time or at present.

When Mrs. Norton resisted the demands due to the lack of evidence and the potential conflict of interest presented, he insinuated for the first time that Mrs. Norton's reluctance was attributable to some alleged involvement by her and the firm in the alleged conspiracy.

Mrs. Norton was alarmed and frightened by his demeanor and bizarre accusation, to the extent that she excused herself from her office to ask another attorney to join her. Mr. Cavanagh, who was still in the building, returned with her to the office where the meeting continued. Mr. Renaud then disclosed that he had unsuccessfully contacted about twenty-five (25) other lawyers to inquire about substitute representation. As he later admitted in his April 7, 1994 letter to Mrs. Norton, he anticipated prior to the meeting, that if he wanted to sue certain additional parties, our office would have a conflict of interest. During the meeting, we affirmed to him that there would be an obvious conflict for our office to participate in a lawsuit against the NJEA, an affiliate, or union representatives. Furthermore, if he now questioned our representation, we could not continue in that capacity.

After Mr. Renaud cancelled an appointment and failed to respond to two letters, Mrs. Norton finally received a letter on April 7th, some three weeks after our meeting. *See* Exhibit C attached to Exhibit B attached hereto. In this letter, he restated his desire to add the previously described counts of conspiracy to the complaint. Mrs. Norton responded by letter which was attached to Exhibit B as Exhibit D, attached hereto. Since we were approaching the deadline to file the complaint, Mrs. Norton advised him that she was prepared to file the complaint in a timely fashion to protect his rights. By doing so, he could later amend and expand the complaint as a *pro se* or with other counsel. Further, Mrs. Norton advised him that she would do everything possible to facilitate a smooth and orderly transition of the file and urged him to see her before the April 18th deadline.

After waiting a week, Mr. Renaud faxed Mrs. Norton a letter at the close of the business day. He was still not explicit as to whether the complaint should be filed. *See*

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Exhibit E which is attached to Exhibit B herein. In any event, by the time the letter was received, the complaint had been sent to the court for filing. Mrs. Norton communicated this fact to Mr. Renaud by letter attached hereto as Exhibit F attached to Exhibit B. Mrs. Norton further explained therein that we could not further represent him in the pending federal litigation and would seek to be relieved as counsel. Mrs. Norton further expressed our willingness to cooperate in any way in any orderly transition of his file. Mr. Renaud called on April 19, 1994 to inquire about a notice of hearing on the appeal taken by his employer with the State Department of Labor regarding his unemployment benefits. As soon as Mrs. Norton began to discuss the District Court complaint, he hung up the telephone.

The complainant subsequently wrote a letter to the Clerk of the District Court, which is attached hereto as Exhibit D, wherein he charged that the complaint was false because it concealed criminal violations of State and Federal law. In response, The Honorable Dickinson Debevoise, U.S.D.J., wrote to Mrs. Norton and asked her whether she would execute a voluntary dismissal on complainant's behalf.

Mrs. Norton's response to the Court is contained in a letter and attachments which are attached hereto as Exhibit B. She asked that this office be relieved as counsel of record, and that the Court entertain Mr. Renaud's request on a *pro se* basis. She indicated that she did not feel she was in a position to represent him even to the extent of signing a Voluntary Dismissal. The Court responded to Mrs. Norton in a letter which is attached hereto as Exhibit E, and subsequently, Judge Debevoise dismissed the matter. This office has had no further direct contact with Mr. Renaud since that time.

Both of the undersigned wish to reiterate that any and all of the actions taken in connection with Mr. Renaud's case and all decisions made on behalf of Mr. Renaud were not influenced or directed by anyone other than Mr. Renaud and the attorneys involved. At no time did either of the undersigned engage in any sort of conspiracy or agreement with any of the parties referenced in the complaint to obtain any political benefit for Congressman Frank Pallone. In fact, the first time either of us were aware that Congressman Frank Pallone was alleged to be involved in some sort of conspiracy against Mr. Renaud was the receipt of this complaint on April 5th.

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A member of this firm, but neither of the two parties referenced herein, acted as the City Attorney for the City of Long Branch from July 1, 1991 until June 30, 1994. This office, has on occasion, represented Congressman Pallone. However, neither of these facts, nor any other collateral consideration, had any bearing on the management of Mr. Renaud's representation. At no time did Congressman Pallone, or any person on his behalf, influence, direct or control the handling of Mr. Renaud's matter through this office, or attempt to do so.

At all times during our representation, we rendered loyal, professional service, and were **successful** in obtaining his **reinstatement** to a full time position, a **reversal** of the decision to deny him unemployment benefits, and **perfecting** his ability to secure damages in the Federal District Court until **he** abandoned that process. The decision not to articulate his conspiracy theory in the litigation was the result of his failure to provide proof, the inappropriateness of the forum and the potential conflict that he was well aware of from the outset of our representation.

While it is accurate to indicate that Frank Pallone did run unopposed in the 1994 Democratic Primary in his district, he was an incumbent Congressman who had been elected in 1992. Mr. Renaud construes that the absence of opposition **must have been** the result of a promise from the Congressman to violate Mr. Renaud's rights. Again, he offers the Commission no proof of this fundamental allegation. The complaint weaves the undersigned into this plot by reasoning that somehow, when we took on his representation in 1993, it was the result of a surreptitious referral by a teacher who would benefit from same, and who was somehow aligned with Congressman Pallone or the other conspirators. Finally, he asks the Commission to conclude that when this office took over his representation in 1993, we were sufficiently clairvoyant to know that during the next year this proposed arrangement would be constructed. Insofar as the allegations against respondents are concerned, they are ludicrious and are vigorously denied.

The complaint is a fabrication. Our office began representation of Mr. Renaud as a member of the NJEA involved in a labor dispute. All decisions regarding the courses of action undertaken against the Edison Board and others were based upon our understanding of the law and our combined 40-plus years of experience. The reasoning of the

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complaint is directly belied by the fact that this office **preserved** his rights in the Federal District Court by filing an action against one of the alleged conspirators he suggests as being a main part of the "plan". The District Court complaint which **perpetuated his ability** to litigate against that entity and **any others he wished to join** in an amended complaint.

Mr. Renaud is the one who was responsible for the dismissal of his complaint in the U.S. District Court. This office declined to execute a voluntary dismissal and respectfully asked the Court to entertain his request to dismiss the complaint as a *pro se* request. His claims, if legitimate, could have been undertaken and presented, by him or any other attorney of his choosing. Ironically, it was our diligence and tenacity in his representation that secured him success at each level that we pursued. The only area that was not resolved in his favor was the area that **he abandoned** before the U.S. District Court.

Certain of the allegations that characterize the nature of Mr. Renaud's complaint cannot go unchallenged. They appear primarily in Part III of his Appendix and the Commission is asked to consider the following in rebuttal.

- Mr. Renaud apparently alleges that somehow Mrs. Norton influenced lawyer Kathleen Sheedy to cancel an appointment regarding his representation.

Mrs. Norton does not know attorney Kathleen Sheedy nor did she discuss with her the prospective representation of Mr. Renaud.

- Mr. Renaud claims a Roman Catholic priest, also an apparent member of this conspiracy, purposely referred him to attorney Patrick Healy and Healy allowed Mr. Cavanagh to listen to Mr. Renaud's conference with him; Healy somehow is alleged to be aligned with Mr. Cavanagh because they both practice in the same areas of law and Mr. Healy is a politician. Mr. Healy told him to accept the accommodation, which this office had secured for Mr. Renaud.

Mr. Cavanagh never listened to conversations between Mr. Healy and Mr. Renaud nor has he ever discussed Mr. Renaud with Mr. Healy. We have no knowledge of the unnamed priest or his connection to this charge.

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- Mr. Renaud says he placed an ad in the New York Law Journal and James Murphy of Floral Park met Mr. Renaud in Newark. He agreed with Mr. Healy that Mr. Renaud should accept the accommodation we secured. Mr. Renaud attributes Mr. Murphy's legal opinion to a supposed relationship with one of the New Jersey conspiring parties.

Neither Mrs. Norton nor Mr. Cavanagh knew Mr. Renaud had sought substitute counsel until March 17, 1995 when he told us he saw 25 lawyers, none of whom would represent him. We do not have a prior relationship with, nor do either of us believe that we even know a lawyer named James Murphy from Floral Park.

- Mr. Renaud says his phone was tapped and that respondents had knowledge of it.

That contention is patently untrue.

- Mr. Renaud claims that Mrs. Norton limited his input at their meetings; that Mrs. Norton recorded these meetings so she could "defend her actions" but that the Commission can expect that the tapes will have been altered by computer.

Mr. Renaud was never limited in his discussions with us. He is accurate to state that the undersigned would demand proof for his accusations and he was never able to provide same. His only justifiable claim was a violation of the "ADA", and when he was repeatedly told that he would agree that there was no proof to support the other allegations. At no time did either of us record any meetings with him as he charges, and his allegation that the fictitious tapes, if they existed, would be altered, is equally preposterous.

In conclusion, the charges against the undersigned are patently fictitious and categorically inaccurate. At no time did either of us participate or advance any alleged conspiracy to secure a political gain for Frank Pallone or anyone else. We successfully served plaintiff's interests obtaining reinstatement of his position and payment of unemployment funds, only to be charged with misconduct and conspiracy without a **single** corroborative piece of evidence or item of proof. The complainant seems to accuse nearly everyone he comes in contact with regarding his matter of conspiring against him. The respondents advanced and sought

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to protect the complainant's rights without influence from anyone and the complaint before the Commission should be dismissed with all due alacrity.

Very truly yours,

THOMAS W. CAVANAGH, JR.

SHARON LYNCH NORTON

TWC/SLN/mmc
encls.

9504370092917

Exhibit A

**NJEA/NEA Legal Services Plan**
NJEA, 180 W. State St., P. O. Box 1211, Trenton, New Jersey 08607-1211

Case No. 30017 9/28/92
Date

Regional Office 11 Field Representative M. PARISE

Attorney Assigned ~~S. BRAUSNER~~ CAVANAUGH

Approved - JW
initials

Description:

EDWARD RENAUD
EDISON TWP.

REFUSAL TO RECOGNIZE RIGHTS OF DISABLED UNDER A.D.A. TITLE I. REFUSAL TO RESTORE TO H.S. POSITION.

23 1290

950437002218

Exhibit

CHAMLIN, ROSEN, CAVANAGH & ULIANO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
268 NORWOOD AVENUE
P.O. BOX 38
WEST LONG BRANCH, N.J. 07764
(908) 229-3200

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RONALD B. ROSEN
CERTIFIED CIVIL TRIAL ATTORNEY
FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
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(N.J., N.Y. & D.C. BARS)
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KENNETH W. CHAMLIN
(N.J. & N.Y. BARS)
SHARON LYNCH NORTON
(N.J. & N.Y. BARS)

ROBERT P. McREVITT
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
(N.J. & PA. BARS)

TELEFAX # (908) 571-8741

May 31, 1994

Hon. Dickinson R. Debevoise, U.S.D.J.
United States District Court
P.O. Box 999
Newark, New Jersey 07101-0999

Re: *Renaud v. Edison Township Board of Education, et al.*
Civil Action No. 94-1626
Our File No. 26089

Dear Judge Debevoise:

I am in receipt of Your Honor's letter regarding the above matter to which you appended Mr. Renaud's April 29, 1994 letter to the Court Clerk, which I had not received from Mr. Renaud. Indeed, when I received your letter, I was in the process of preparing a Motion to be Relieved as Counsel because Mr. Renaud had not answered my recent requests for further direction in this matter. I telephoned your chambers as you requested in your letter and explained to Mr. Laden, for this reason and others, I do not feel that I can represent Mr. Renaud further in any capacity, including the filing of a voluntary dismissal on his behalf.

Pursuant to Your Honor's written request, I am setting down herein the history of this matter and the reasons I seek to be relieved. Should Your Honor prefer, I will also bring a formal motion for same. In any event, I certify to the truth of my statements herein.

Mr. Renaud came to this office in February, 1993 and asked Mr. Cavanagh and me to take over his representation from Stephen Klausner, Esq. At that time, he was unemployed and not receiving any employment benefits. He had been employed as a high school Industrial Arts teacher in the Edison School District. During the previous September, he was reassigned to a Middle School position with different hours and course schedules. Mr. Renaud maintained that the employment offered did not reasonably accommodate his disability narcolepsy. The position of the Edison Board was

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that he had declined to accept available employment in September of 1992. Mr. Renaud specifically asked us to assist him in securing his former position with a reasonable accommodation and to reverse the State Employment's denial of unemployment benefits for the interim period. Prior to our representation, Mr. Renaud had filed a charge of handicap discrimination with the New Jersey State Division of Civil Rights.

After this office took over his representation, I immediately contacted the Edison Board attorney and entered into negotiations to secure a position for Mr. Renaud at the High School, which would reasonably accommodate his disability. After meetings with the Board attorney, the superintendent and others, my office successfully secured Mr. Renaud's reinstatement to his former high school position with the accommodation he needed. To the best of my knowledge, he is still working in that position. This was done without waiver of any claim for damages from the 1992-1993 school year, which we agreed would be perfected in Federal District Court pursuant to the Americans With Disabilities Act. To that end, Mr. Renaud's Division of Civil Rights complaint was transferred to the Equal Employment Opportunity Commission and a request for a Right to Sue letter was made.

Meanwhile, both Mr. Cavanagh and I represented Mr. Renaud before the State Unemployment Board and successfully obtained a reversal of the original denial of benefits. Mr. Renaud received full unemployment benefits retroactive to the filing date.

More than a month before the complaint was due to be filed in Federal District Court, Mr. Renaud received a draft and made some changes. A meeting was scheduled to review the second draft of the complaint with me in my office on March 17, 1994. Up until that meeting, Mr. Renaud had never expressed to us anything but approval and satisfaction with the way in which his case had been handled. However, at the March meeting, he raised issues, theories and discussed parties separate and apart from the discrimination claim, which areas had never been the focus of the agreed upon cause of action. During the meeting, he disclosed for the first time that he had contacted about twenty-five (25) other lawyers to inquire about representation unsuccessfully.

I was shocked and somewhat frightened by his demeanor and suggested that after he leave the office, he review the

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second draft of the complaint, and then advise us if he wished to engage other counsel or continue the matter *pro se*. I reminded him that the complaint had to be filed on or before April 18, 1994, which was then about one month away.

After one week's time, he telephoned Mr. Cavanagh and told him that he had reviewed the second draft and scheduled an appointment to meet with me on March 28, 1993. Mr. Renaud telephoned to cancel the appointment for personal reasons but did not reschedule an appointment. Consequently, I wrote a letter to him on March 30, 1994 which he received on March 31, 1994 asking him to reschedule the appointment given the filing date and his attempts to seek substitute counsel. (*See* letter from Sharon Lynch Norton, Esq. to Edward Renaud dated March 30, 1994 attached hereto as Exhibit A.)

Still receiving no response, on April 6, 1994 I again wrote to Mr. Renaud asking him to telephone the office. (*See* letter from Sharon Lynch Norton, Esq. to Edward Renaud dated April 6, 1994 attached hereto as Exhibit B.)

On April 7, 1994, my office received a lengthy letter from Mr. Renaud which seemed to memorialize his new desire to expand the anticipated litigation to include defendants and theories outside the discrimination claim, alleging conduct and possible conspiracies of both a civil and criminal nature against Middletown Pharmacy, the disability carrier, his local and state union, a physician, VALIC and possibly others. He also returned a copy of the second draft with revisions. (*See* letter from Edward Renaud to Sharon Lynch Norton, Esq., dated April 3, 1994, attached hereto as Exhibit C.)

On April 8, 1994, I responded in writing to Mr. Renaud. I explained that the agreed upon focus of our representation, at least prior to the March 17, 1994 meeting was to secure his reinstatement with a reasonable accommodation and to file a lawsuit in Federal District Court against his employer pursuant to the Americans With Disabilities Act to recover lost earnings, benefits, pain and suffering, as well as punitive damages. I further stated that on the eve of the filing of the complaint, he apparently wanted to expand the litigation to include defendants and theories separate from what we had agreed was the basis of a discrimination claim. Indeed, in his letter Mr. Renaud stated that the reasons he sought other counsel was the anticipation that if he wanted to sue his union and others, I would have a conflict of interest. (*See* letter of

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Sharon Lynch Norton, Esq. to Edward Renaud dated April 8, 1994 attached hereto as Exhibit D.)

Finally, I advised him I was prepared to file the claim upon which we had focused over the last 15 months. However, if he wanted to alter and expand the thrust of the litigation, he was welcome to seek other counsel and I would do everything possible to facilitate a smooth and orderly transition of the file. *Id.* at 3. However, I also advised that absent hearing from him in a timely fashion, I would file the complaint in order to protect his rights. I urged him to call me and/or come in to see me before April 18, 1994. *Id.* at 4.

It was not until the close of business on Friday, April 15, 1994 that Mr. Renaud faxed me a letter which still did not explicitly state whether he was directing us not to file the complaint, although he said therein that he filed a complaint with the Commissioner of Education. (*See* letter of Edward Renaud to Sharon Lynch Norton, Esq. dated April 15, 1994 attached hereto as Exhibit E.) In any event, by the time his letter was received, the complaint had already been sent to the Court for filing.

On April 19, 1994, I communicated this fact to Mr. Renaud in writing and further informed him that, for the reasons advanced both in the March 17th meeting and his two subsequent letters and his refusal to orally communicate with us about his case, as well as his filing an administrative claim on his own, we could not represent him in the pending federal litigation and would seek to be relieved. (*See* letter from Sharon Lynch Norton, Esq. to Edward Renaud dated April 19, 1994 attached hereto as Exhibit F.) Again I expressed my willingness to cooperate in any way with an orderly transition of his file. *Id.*

That same day Mr. Renaud telephoned this office. The State Department of Labor had sent him a notice of hearing of an appeal by his employer of the granting of his benefits. He spoke to Mr. Cavanagh and myself to confirm his desire to adjourn the hearing, but as soon as I began to tell him of the status of the District Court complaint, he apparently hung up the telephone, as a recording told me to hang up. Again, it appeared that Mr. Renaud did not want to discuss his case with us. We have no knowledge of the case which he said he has since brought before the Commissioner of Education. I did, however, adjourn the hearing before the State Department of Labor as Mr. Renaud had requested.

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I have had no further communication from him though I had asked that he inform me if he wanted to withdraw the matter or substitute different counsel. (*See* Exhibit F.) Consequently, I began preparing a motion to be relieved as counsel. I then received Your Honor's letter with Mr. Renaud's letter to the Clerk enclosed. While it certainly appears from that letter that Mr. Renaud wishes to withdraw his complaint, since he has refused to communicate directly with me about the lawsuit in any way, I feel I am not in a position to represent him even to the extent of signing a Voluntary Dismissal on his behalf.

For all of the above said reasons, I respectfully ask that the Court relieve my office as counsel in this matter and entertain Mr. Renaud's request on a *pro se* basis. The defendants have not been served in the action, so they have not been copied on this letter. I await the further direction from the Court.

I thank Your Honor for your attention and courtesies in this matter and apologize for any inconvenience to the Court which may have occurred.

Respectfully submitted,

SHARON LYNCH NORTON

SLN/mmc
cc: Mr. Edward Renaud

950437002 3

Exhibit A

CHAMLIN, ROSEN, CAVANAGH & ULIANO
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CERTIFIED CIVIL & CRIMINAL TRIAL ATTORNEY
KENNETH W. CHAMLIN

ROBERT P. McKEVITT
SHARON LYNCH NORTON
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON

March 30, 1994

Mr. Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718

Re: *Renaud v. Edison Township Board of Education*
Our File No. 26089

Dear Ed:

As you know, we had an appointment scheduled for Monday, March 28, 1994 to review again the complaint which was drafted in the above named matter. I understand from my secretary that you cancelled the appointment for personal reasons which I hope resolved well for you.

You are aware that this complaint must be filed in Federal District Court on or before April 18, 1994, in order to preserve your rights. We have been ready to file this complaint for several weeks but have deferred for your final review. In addition, in our two-hour meeting on March 17, 1994, you indicated for the first time that you had been seeking substitute counsel for some time. Thus, we have yet to resolve who is filing this complaint on your behalf, or whether you are proceeding *pro se*.

It is imperative that you reschedule this appointment immediately so that the complaint is timely filed.

Very truly yours,

SHARON LYNCH NORTON

SLN/mmc

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**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Edward Renaud
508 Fox Avenue
Belford, N.J. 07718

4a. Article Number
P317 780 428

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
3/31/92

5. Signature (Addressee)
Edward Renaud

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, November 1990 ★U.S. GPO: 1991—287-099 **DOMESTIC RETURN RECEIPT**

9504370009225

Exhibit B


CHAMLIN, ROSEN, CAVANAGH & ULIANO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

288 NORWOOD AVENUE

P.O. BOX 38

WEST LONG BRANCH, N.J. 07764

(908) 229-3200

TELEFAX # (908) 571-8741

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ROBERT P. McKEVITT
SHARON LYNCH NORTON
(N.J. & N.Y. BARS)
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
(N.J. & PA. BARS)


April 6, 1994

Mr. Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Re: Renaud v. Edison Township Board of Education
Our File No. 26089

Dear Mr. Renaud:

On March 30, 1994, we sent you a certified letter which you received on March 31, 1994. We had asked you to contact us immediately regarding the filing of the Federal District Court complaint in the above named matter. As you were already aware, the complaint must be filed on or before April 18, 1994 in order to preserve your rights. You have not responded to our letter, nor have you telephoned our office to make an appointment.

As we indicated to you in our last letter, your indication that you are seeking substitute counsel has left us in a quandary as to what you intend us to do about the filing of the complaint. In addition, you informed Mr. Cavanagh that you were still reviewing the second draft of the complaint and wanted to discuss the same with us. Yet, you have not done so. If your personal situation is making the scheduling of an appointment difficult, just let us know that so that we can work around it. Please do not simply ignore our requests to contact us. We cannot represent you without your cooperation.

Again, kindly telephone us upon receipt of this letter.

Very truly yours,

SHARON LYNCH NORTON

SLN:rnf

9504370026

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery
Consult postmaster for fee.

3. Article Addressed to:
Mr. Edward Renaud
508 Fox Avenue
Belford, NJ 07718

4a. Article Number
P 074 523 086

4b. Service Type
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
6-18-94

5. Signature (Addressee)
Edward Renaud

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 *U.S. GPO: 1993—352-714 DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

P 950 437 000 227

Exhibit C

1 OF 11

APRIL 3, 1994

508 FOX AVENUE

BELFORD, N.J. 07718

DEAR MRS. MORTON,

IN REFERENCE TO YOUR LETTER OF MARCH 30, 1994:

THE CAUSE OF CANCELING THAT APPOINTMENT IS THAT MY MOTHER HAS GONE ALMOST COMPLETELY BLIND FROM CATARACTS, AND I AM PRINCIPALLY RESPONSIBLE FOR TAKING CARE OF HER. SHE MISTAKENLY PUT OFF SURGERY IN THE HOPE THAT SHE WOULD BE OF ASSISTANCE TO ME IN MY DISPUTE WITH THE FRAN. TOWNSHIP BOARD OF EDUCATION AND THE FRAN. TOWNSHIP EDUCATION ASSOCIATION. AT THE AGE OF 78 SHE HAS SOME TROUBLE UNDERSTANDING THAT THESE TWO PARTIES CONSIDERED AT LEAST SINCE THE TIME I WAS CHECKED BY MARCOTTE IN 1984 TO END MY EMPLOYMENT BY USE OF REDUCTION-IN-FORCE. SPECIFICALLY THEY HAVE RETAINED IN EMPLOYMENT INDIVIDUALS WHO LACK PERMANENT CERTIFICATION AND IN 1985 GRANTED A VETERAN, RALPH VENTOLA ONE YEAR SERVICE TIME UNDER N.J.S.A. 18A:28-12. THEY THEN FOLLOWED A COURSE OF ACTION THAT CONTINUES TO THIS DAY, WHICH IS TO INTENTIONALLY VIOLATE MY RIGHTS AS A TENURED TEACHER DAMAGING ME FINANCIALLY AND DAMAGING MY SENIORITY BY USING A FRAUDULENT SENIORITY LIST TO JUSTIFY REDUCING ME TO PART TIME POSITIONS.

I HAVE EXPLAINED THIS SITUATION TO YOU IN THE HOPE THAT I WOULD GET SOME HELP, AND

EXPLAINED IT TO MY MOTHER ADDING THAT IF SHE EXPECTED TO "SEE" MY RIGHTS OBSERVED SHE BETTER GET HER EYES FIXED AND LIVE ANOTHER 20 YEARS.

3. AS FOR THE COMPLAINT IN FEDERAL DISTRICT COURT I FIRMLY BELIEVE THAT IT IS BEYOND CORRECTION. IT IS A LONG DELAYED RESPONSE TO WHAT WAS AND IS A A.C.P. DISPUTE WHERE THE BOARD AND E.T.E.A HAVE ENGAGED IN MALICIOUS PROSECUTION, AND MY RIGHTS UNDER N.J.S.A. 18A "SCHOOL LAW" AND N.J.S.A. 10:5-1 ET SEQ. HAVE BEEN REGULARLY VIOLATED. AS I HAVE PREVIOUSLY STATED I RECOGNIZED THAT MR FLUR WAS DETERMINED AND LYING TO ASSURE THAT I WOULD BE PUT INTO A POSITION WHERE ACCOMMODATION TO MY DISABILITIES WOULD DAMAGE MY FINANCES AND SENIORITY.

4. A FEDERAL COMPLAINT WAS NOT MY CHOICE, THERE EXISTED A ARRAY OF VENUES THAT COULD HAVE BEEN CHOSEN AND I WANTED THE MOST RAPID ONE. AS I RECALL DISCUSSIONS HAVE PROGRESSED FROM FEB 4, 1993 WHERE MR CRANAGH'S PRIMARY CONCERN WAS THAT I HAD NO HEARING, NO INCOME, AND NO PAY FROM EDISON, AND THAT I SHOULD MY REPRESENTATION THRU THE N.J.E.A. TO HIM. THIS WAS ACCOMPLISHED DESPITE MICHAEL PARISE'S OPPOSITION. FEBRUARY 16, 1993 I DELIVERED MY FILE DESPITE STEPHEN KLAGER'S OPPOSITION. I COMPLETED THE FILE BY REPLACING THE DOCUMENTS ON VALUE WHERE THE BOARD

FRAUDULENTLY REMOVED MY MONEY FROM MY ACCOUNT AND VALIC TRIED TO AVOID TELLING ME ABOUT IT.

On MARCH 2, 1993 WE DISCUSSED FILING IN SUPERIOR COURT IN MONMOUTH COUNTY WHICH WAS LATER NEGATED AS A POSSIBILITY BECAUSE EDISON IS IN MIDDLESEX COUNTY. WE ALSO DISCUSSED THE ACTIONS OF WASHINGTON NATIONAL INSURANCE COMPANY WHO HAD DENIED MY CLAIM AND VIOLATED THE STATE LAWS ON INSURANCE. AS YOU STATED IT SEEMED UNUSUAL BECAUSE WASHINGTON NAT'L HAD A CAUSE OF ACTION AGAINST EDISON FOR DENYING ME ACCOMMODATION TO MY DISABILITY RESULTING IN MY CLAIM FOR BENEFITS.

WHEN I MENTIONED THAT I THOUGHT THIS SHOULD BE BROUGHT TO THE JUSTICE DEPARTMENT YOU CANCELLED THE FACT-FINDING HEARING AT THE DCR ON THE CHARGES THAT I FILED, AND I MISTAKENLY TOOK YOUR ADVICE DROPPED MY P.C.R. COMPLAINT. AS YOU KNOW I WAS NOT ALLOWED TO FILE THE CHARGE THEY DESCRIBED AS CRIMINAL REGARDING EDISON'S REMOVAL OF FUNDS FROM MY ANNUITY, VALIC. AND THEY EDITED OUT ALL OF THE CHARGES OF RETRIBUTION, INTERFERENCE AND COERCION REGARDING MR. FLOR, DR DE ASTRO, AND WASHINGTON NATIONAL

YOUR POSITION IN APRIL WAS TO TAKE MY CASE TO FEDERAL COURT BECAUSE OF THE IMPROPRIETIES IN MY CASE, WHICH ADDED 4 MONTHS TO THE DATE

THAT A LAWSUIT COULD BE FILED (A ADDITIONAL FOUR MONTHS WITHOUT ANY INCOME.) THE 90 DAY RIGHT-TO-SUE LETTER THEN DID NOT ARRIVE IN AUGUST BUT IN JANUARY, 5 MONTHS LATER. THEN ANY ACTION TO FILE CHARGES WAS DENIED UNTIL MARCH 15, 1994.

I BELIEVE THAT I AM SUBSTANTIALLY CORRECT IN THE ABOVE NARRATIVE OF EVENTS. IF YOU FEEL I'M INCORRECT IN ANY WAY PLEASE ADDRESS ANY ERRORS IN A LETTER TO ME. I WOULD ALSO LIKE TO HAVE SENT TO ME TWO ITEMS: THE RIGHT TO SUE LETTER AND THE SCHEDULE PROPOSED BY DR. JOSEPH KRESKEY ON SEPTEMBER 27TH 1993. IN WHICH HE AGAIN PROPOSES TO VIOLATE THE LAW N.J.S.A. 18A:16-10 BY AGAIN REDUCING MY PAY AND DAMAGING MY SENIORITY.

THROUGHOUT THIS DISPUTE I HAVE FURNISHED ANY MATERIAL THAT I THOUGHT RELEVANT, EXPRESSED MY CONCERNS AND MADE EVERY ATTEMPT TO FILE COMPLAINTS WHEN I POSSIBLY COULD. THE FOLLOWING ISSUES HAVE BEEN ADDRESSED BY ME DIRECTLY OR IN THE CONTEXT OF MY LIMITED UNDERSTANDING OF THE SITUATION.

- 1985 E.T.E.A. REVERSES MY SENIORITY IN CONSPIRACY TO DISCRIMINATE WITH THE BOARD OF EDUCATION.
- 1991-1992 THEY SUCCESSFULLY LIE + COERCE ME INTO A PART TIME POSITION BY FRAUD, TAKING MY MONEY AND DAMAGING MY SENIORITY.

950403 0009

- 1991-1992 DENY ACCOMMODATION TO MY DISABILITY ENGAGING IN MALICIOUS PROSECUTION; MY TEACHING ASSIGNMENT IS BASED ON FRAUD. I WOULD EXPECT THAT WITHOLDING MY PAY BASED ON FRAUD MAKES IT THEFT BY WITHOLDING
- UNEMPLOYMENT = DENIAL OF DUE PROCESS, PERJURY BY LORENE MOORE, DESTRUCTION OF SWORN TESTIMONY, (AND UNDISCLOSED - STEPHEN KLAUSNER SUBORNS PERJURY BY L. MOORE REGARDING MY VOLUNTARILY BEING EXAMINED BY DR DE CASTRO.)
- WASHINGTON NATIONAL INSURANCE COMPANY CONSPIRACY, MALICIOUS DENIAL OF MY CLAIMS, OBSTRUCTING, AND A MALICIOUS FRAUD INVESTIGATION.
- AND THE LIST GOES ON, 1984 UNTIL PRESENT AND INCLUDES THREATS OF SUMMER, AND PROBABLY WORSE.

I WOULD LIKE YOU TO STATE IN WRITING THAT THIS COMPLAINT WILL NOT BLOCK MY FILING PRO SE IN SUPERIOR COURT OR AT ANY OTHER VENUE.

THE POSITION TAKEN FOR THE PAST YEAR WHILE I HAVE BEEN REPRESENTED BY YOU AND MR. CAVANAGH HAS BEEN THAT I SHOULD ACCEPT RETRIBUTION, INTIMIDATION, HARASSMENT VIOLATIONS OF MY RIGHT TO DUE PROCESS, FINANCIAL HARASHIP, SEVERE EMOTIONAL STRESS, INVASION OF PRIVACY AND CONTINUING VIOLATIONS OF MY RIGHTS UNDER SCHOOL LAW.

 APRIL 3, 1994

REGARDING MY SEEKING SUBSTITUTE COUNSEL:

YOUR STATEMENT THAT IN YOUR LETTER OF MARCH 30 1994 IS INCORRECT; IN OUR SEPTEMBER MEETING IN OUR DISCUSSION OF MY COST INCURRED WE DISCUSSED THE ITEM "ATTORNEY COSTS" IN THE AMOUNT OF $820.00. IF YOU WOULD LIKE I WILL WRITE DOWN THAT PART OF OUR CONVERSATION FROM MEMORY. AS YOU KNOW MY MEMORY IS ACCURATE. LONG AND A LIKELY CAUSE THAT I'VE BEEN KEPT OUT OF ANY SITUATION WHERE I WOULD BE DEPOSED, EITHER SWORN TESTIMONY OR AT LEAST EMBARASS THE HELL OUT OF SOME PEOPLE, AND IT PROTECTS THE LENGTHY LIST OF THOSE WHO CONSPIRED, OR ACTED TO AIDE AND ABET DISCRIMINATION.

THE CAUSES OF MY SEEKING SUBSTITUTE COUNSEL:

- THE DCR FACT-FINDING HEARING FOR MAY 8, 1993 ON YOUR STATED PREMISE THAT IF I "LOST" AT THAT HEARING I WOULD HAVE NO RIGHT TO ANY APPEAL
- THE STATED PREMISE THAT I HAD TO DROP MY DCR COMPLAINT BEFORE A ACTION IN SUPERIOR COURT COULD BEGIN.
- I HAD BEEN DENIED THE RIGHT TO FILE THE TRUE AND CORRECT COMPLAINTS AT THE DCR AND E.E.O.C. REGARDING THE ACTIONS OF DR. DE CASTRO, VALIC, WASHINGTON NATIONAL, ETC. AND INSISTED ON HELP IN FILING CHARGES AND THOSE CORRECT CHARGES WERE NEVER FILED.

EXHIBIT 3 C 0137 0

- DISCOVERY THAT WAS TO TAKE PLACE AFTER THE APRIL 28, 1993 MEETING WITH DR. KRESKEY L. MOORE, MR. FICHICCHI AND D FLOR WAS CANCELLED
- I HAD NO PROTECTION FROM RETALIATION, DENIAL OF DUE PROCESS, NO RIGHT TO FILE CHARGES AND GENERALLY NO INCOME.
- AT EACH DISCUSSION OF THE N.J.E.A. PAYING FOR MY REPRESENTATION I CLEARLY STATED THAT I WANTED TO BE RID OF THE N.J.E.A.. APPARENTLY THEY OWN MY RIGHTS AND THERE IS NO ESCAPE.
- I REGARDED YOUR QUESTION OF HOW MUCH I WAS WILLING TO SPEND TO PROTECT MY RIGHTS AS A INQUIRY INTO MY FINANCIAL ABILITY TO PURSUE THE N.J.E.A. FOR FAILING TO REPRESENT ME.
- ON FEB 9, 1994 I OUTLINED THE ACTIONS OF THE MIDDLETOWN AGENCY IN CUTTING OF MY MEDICATION DAYS AFTER MR. FLOR'S THREAT TO LOOK INTO MY MEDICAL RECORDS AS A MEANS OF GETTING RID OF ME. YOU DESCRIBED IT AS MORE EVIDENCE OF CONSPIRACY AND DECLINED TO ACCEPT THE COPY OF EVIDENCE.
- WHEN I SAID THAT WASHINGTON NATIONAL WAS LIKELY MALICIOUSLY CLAIM FRAUD AND INITIATE A INVESTIGATION TO FIND SOMETHING TO HELP FORUM CONTINUE TO BATTER ME, OR DAMAGE MY RELATIONSHIP WITH ANYONE I AM IN CONTACT THERE WAS NO REACTION OR RESPONSE. I EXPECT THAT I AM CORRECT AND THEY ARE LOOKING TO PROTECT FELLOW CONSPIRATORS.

- YOU HAVE ACKNOWLEDGED THAT I HAVE THE MATERIAL TO PREVAIL AGAINST EDISON BUT I HAVE HAD NO REASONABLE MEANS TO PRESENT IT.

IN OUR TWO HOUR MEETING OF MARCH 17, 1994 I ACKNOWLEDGED THAT I CAN NOT FIND A ATTORNEY TO REPRESENT ME AT ANY PRICE. I WILL WITHOLD THE SPECIFICS OF WHAT I DID LEARN FROM OTHER ATTORNEYS PRINCIPALLY BECAUSE MR. CAVANAGH HAS EXPRESSED CONCERN THAT THE N.J.E.A. WAS LIBELED, MUCH AS MICHAEL PARISE THREATENED LIBEL IF I SAID ANYTHING ABOUT STEPHEN KLAUNER.

I SOUGHT SUBSTITUTE COUNSEL ON MY CORRECT PRESUMPTION THAT A FEDERAL VENUE WAS CHOSEN FOR DELAY AND PRECLUDED MY FILING OF CHARGES OR COMPLAINTS ANYWHERE ELSE. I ANTICIPATE THAT IF I WANTED TO SUE WASHINGTON NAT'L, VALIC, OR EDISON'S CO-CONSPIRATOR THE E.T.E.A. OR FILED AT PERC. YOU WOULD CLAIM CONFLICT OF INTEREST, LEAVING ME AS A DISABLED PERSON AT A VENUE THAT WAS NOT MY CHOICE, IS THE MOST EXPENSIVE, UNSYMPATHETIC, AND DIFFICULT FOR A INDIVIDUAL WHO IS HANDICAPPED AND FORCED TO APPEAR "PROSE."

THE SUGGESTION ADVANCED BY MR CAVANAGH THAT I FIND OTHER N.J.E.A. COUNSEL IS ABSURD. I HAVE HAD 18 MONTHS OF N.J.E.A PAID ATTORNEYS; AND PROGRESS OR RIGHTS, AND 18 MONTHS OF HELL INFLICTED ON ME.

I CERTAINLY SHARE YOUR CONCERN THAT YOU MIGHT BE IMPLICATED IN CONSPIRACY OR A R.I.C.O OFFENSE, I RECOGNIZED THAT POSSIBILITY LONG AGO AND AS MR. CAVANAGH HAS ACKNOWLEDGED I'M NOT A ATTORNEY. I MOST CERTAINLY WARNED YOU AND MR. CAVANAGH THAT EDISON WAS KNOWN FOR VIOLATING PEOPLE'S RIGHTS, ACTING WITH OTHERS, BRINGING PEOPLE INTO THEIR SCHEMES IN SMALL WAYS, USING THEM AND TOSSING THEM TO THE WOLVES. WHEN MR. CAVANAGH ASKED ME WHO HAD THE CORRECT VERSION OF THE TAPES FROM THE DEC. 4, 1992 UNEMPLOYMENT HEARING I SAID PROBABLY EDISON, THEY WOULD USE THEM TO BLAME LORENE MOORE AND BLACKMAIL HER OUT OF HER JOB. WHAT COULD SHE DO; ADMIT PERJURY? SHE WOULD LOSE HER JOB. DR. KREISKEY KEEPS HIS NAME OFF HIS DIRTY WORK. I PREDICTED L. MOORE RESIGNATION IN MARCH AND BY JULY 1993 I WAS RIGHT. THAT SHOULD SERVE AS A EXAMPLE TO ANYONE WHO IS WILLING TO ASSIST THEM IN THEIR DIRTY WORK.

I AM NOT CHOOSING TO APPEAR "PRO SE", THIS FEDERAL COMPLAINT EFFECTIVELY ASKS ME TO CONCEAL CONSPIRACY, PERJURY, DESTRUCTION OF SWORN TESTIMONY, FRAUD UNDER THE "COBRA LAW", AND SECURITIES FRAUD. I HAVE MADE IT CLEAR THAT I WILL NOT DO THAT, I'VE SPENT 10 YEARS BEING THEIR VICTIM, I WILL NOT ACCEPT A LIFETIME OF THAT.

0501310

I CONTINUE TO HOLD THE N.J.E.A., E.T.E.A. RESPONSIBLE FOR LEGAL REPRESENTATION, AND ACKNOWLEDGE THAT THE CONFLICT OF INTEREST IS THE N.J.E.A.'S PROBLEM, NOT MINE. I DID NOT INVOLVE THE E.T.E.A IN DISCRIMINATION, THEY CHOSE TO VIOLATE MY RIGHTS WITH MALICIOUS INTENT AND INVOLVED OTHERS TO AIDE AND ABET DISCRIMINATION. I WOULD EXPECT THAT ANY ATTORNEY WHO ACCEPTED MY CASE AND N.J.E.A. ANY WOULD LOOK TO THEIR INTERESTS FIRST AND MY CASE SECOND. LET THE N.J.E.A. RESOLVE THEIR DILEMNA, THE N.J.E.A. HAS THE RESPONSIBILITY FOR WHAT HAS HAPPENED FOR 18 MONTHS DURING A PROLONGED "EMPLOYMENT PROBLEM".

AS TO EDISON'S DEFENSE, I WOULD EXPECT THEM TO CONTINUE AS USUAL; THREATS, FORGED DOCUMENTS ALTERED TAPES, CLAIMS THAT I ALTERED DOCUMENTS, KNEW THAT MY SENIORITY WAS INCORRECT AND WAS VACATIONING ON UNEMPLOYMENT OR DISABILITY. THEY'VE HAD PLENTY OF TIME TO CONTINUE BREAKING THE LAW AND PLENTY OF HELP DOING IT. AS YOU KNOW I'VE HAD NO HELP INVESTIGATING, DISCOVERING LEGAL VIOLATIONS UNDER SCHOOL LAW OR AND OTHER LAWS. EDISON AND THE E.T.E.A. ARE RESPONSIBLE FOR CLAIMS TO WASHINGTON NATIONAL, THEY ARE A RESULT OF THEIR CONSPIRACY TO OBSTRUCT MY RIGHTS USING THE R.I.F. PROCESS AND A FRAUDULENT SENIORITY LIST, IT'S THEIR FRAUD AND THEIR RESPONSIBILITY. AS IS MY UNEMPLOYMENT CLAIM.

11 OF 11 APRIL 3, 1994

THE PREMISE FOR ANY SUIT SHOULD BE MALICIOUS ABUSE OF THE LEGAL PROCESS (THE A.D.A LAW), USING A CIVIL ACTION TO VACATE A CRIMINAL FRAUD. I WANT MY RIGHTS REPRESENTED, IN 18 MONTHS THEY HAVE BEEN VIOLATED AND IGNORED, AND APPARENTLY THE LINE BETWEEN CIVIL LAW AND CRIMINAL LAW WAS CROSSED LONG AGO.

PLEASE SUPPORT IN WRITING THAT THIS COMPLAINT WILL SERVE SOME OTHER PURPOSE OTHER THAN TO FURTHER DELAY AND OBSTRUCT MY RIGHTS. I WILL EXPLAIN IT'S PURPOSE AS I UNDERSTAND IT.

IF I AM FORCED TO APPEAR "PRO SE" IN THIS MATTER I WILL DO SO, HAVING NO OTHER CHOICE. MY DISABILITIES WILL SEVERELY IMPAIR MY ABILITY TO PURSUE MY RIGHTS, A SITUATION THE BOARD AND E.T.F.A. HAVE USED TO VIOLATE MY RIGHTS SINCE 1984, WHEN THEY FIRST CONSPIRED TO VIOLATE THEM. APPEARING "PRO SE" I WILL CHOOSE THE TIME, THE VENUE AND THE CORRECT LIST OF DEFENDANTS. I HAVE TRIED TO FOLLOW THE LAW AND LEARN IT AT THE SAME TIME WITHOUT HELP PROTECTING MY RIGHTS. I CAN EXPLAIN MY ACTIONS IN THIS TO DISPUTE AND I'M PROBABLY THE ONLY ONE WHO CAN. I'VE RETURNED A COPY OF THE COMPLAINT, IT IS THE WRONG COMPLAINT, WRONG VENUE, WITH TOO FEW DEFENDANTS.

SINCERELY,

Edward Russell

0504370

Exhibit D

CHAMLIN, ROSEN, CAVANAGH & ULIANO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
268 NORWOOD AVENUE
P.O. BOX 38
WEST LONG BRANCH, N.J. 07764
(908) 229-3200
TELEFAX # (908) 571-8741

GEORGE M. CHAMLIN
CERTIFIED CIVIL TRIAL ATTORNEY
RONALD B. ROSEN
CERTIFIED CIVIL TRIAL ATTORNEY
FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
THOMAS W. CAVANAGH, JR.
CHARLES J. ULIANO
CERTIFIED CIVIL & CRIMINAL TRIAL ATTORNEY
KENNETH W. CHAMLIN

ROBERT P. McKEVITT
SHARON LYNCH MORTON
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON

April 8, 1994

Mr. Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Re: Renaud v. Edison Township Board of Education
Our File No. 26089

Dear Mr. Renaud:

Yesterday we received your letter dated April 3, 1994. I was saddened to hear about your mother's situation, which I hope is improving.

Your letter appears to be a summary of statements which you made to us for the first time in our meeting of March 17, 1994. That meeting was originally scheduled to review suggested changes that you made to the first draft of the complaint, which we prepared for filing in a Federal District Court action alleging employment discrimination. Up until that meeting, you had never expressed to us anything but approval and satisfaction with the way in which your case had been handled. However, during that March meeting, you raised issues, theories, and discussed parties separate and apart from the discrimination claim, which areas had never been the focus of the agreed upon cause of action. Both Mr. Cavanagh and I expressed our shock at this sudden change in your demeanor and the departure from what had clearly been our joint litigation plan over the last 15 months.

During the meeting, you also disclosed for the first time that you had contacted about twenty-five (25) other lawyers to inquire about representation. You left our office that night with a second draft of the complaint to review. We understood that you would contact us immediately upon completion of same, and that you would then advise us whether, under the circumstances of your just recently voiced dissatisfaction, you wished to engage other counsel or continue the matter pro se. As you are aware and we discussed, the complaint must be filed on or before April 18, 1994, which was then one a month away.

950437/002259

After one week's time, you telephoned Mr. Cavanagh to tell him that you had reviewed the second draft and would make an appointment to meet with me, which you scheduled for March 28, 1993. Unfortunately, you were unable to keep that appointment for personal reasons. Since you did not schedule another appointment, I wrote to you on March 30, 1994 asking you to contact this office immediately to reschedule same, and again reminding you of the April 18th deadline. You apparently received that letter on March 31, 1994, however, you did not re-contact us or make another appointment to meet with us. Instead, on April 7, 1994, we received the lengthy letter referenced above which seems to memorialize the desire to expand the anticipated litigation to include defendants and theories outside the discrimination claim, alleging conduct and possible conspiracies of both a civil and criminal nature, against Middletown Pharmacy, the disability carrier, your local and state union, a physician, VALIC, and possibly others.

When you first came to this office and asked us to take over your representation from Stephen Klausner, Esq., in February of 1993, you were unemployed and not receiving any unemployment benefits. The position of the Edison Board was that you had declined to accept available employment in September, 1992. You maintained that the employment offered did not reasonably accommodate your disability. We were asked to assist you in securing your former position with a reasonable accommodation and to also reverse the State Employment's denial of unemployment benefits in the interim.

From the outset of our representation of you, each step that was taken was explained to you and was met with approval and satisfaction. In fact, you regularly applauded and thanked me for the aggressive way that your case was being handled. Shortly after this office took over your representation, I immediately contacted the Board attorney and entered into negotiations to secure a position at the High School with reasonable a accommodation in the schedule given your disability of narcolepsy. You were present and participated in the meetings and conferences which ultimately resulted in the Board's reinstatment of you in September, 1993 to your former high school position with the accommodation in scheduling to allow for your disability. This was done without waiver of any claim for damages for the 1992-1993 school year, which we agreed would be perfected in Federal District Court pursuant to the Americans With Disabilities Act. Meanwhile, Mr. Cavanagh and I represented you before the State Unemployment Board and successfully appealed their original denial of benefits, and you then received benefits retroactive to the filing date.

9504370074 0

In preparation for the Federal lawsuit, the Division of Civil Rights complaint (filed by you prior to our representation) was transferred to the Equal Employment Opportunity Commission ("EEOC"). Thereafter, we requested a right to sue letter and made every effort to secure this administrative exhaustion of remedies as quickly as possible. Apparently, the Justice Department reviews EEOC complaints filed against a government agency before a right to sue letter is issued, and the process takes time. In any event, a right to sue letter was issued, and we prepared the complaint to be filed within 90 days. Indeed, we met with you beforehand and advised you as to how we would proceed.

Given what we have accomplished on your behalf over the last year, it is difficult to imagine how you can state as you do in your April 3rd letter that, "the position taken for the past year while I have been represented by you and Mr. Cavanagh has been that I should accept retribution, intimidation, harassment violations of my rights to due process, financial hardships, severe emotional stress, invasion of privacy, and continuing violation of my rights under school law."

There was never a question raised until March 17, 1994 that the agreed upon focus of our representation was to secure your reinstatement with a reasonable accommodation and to file a lawsuit in Federal District Court pursuant to the Americans With Disabilities Act to recover lost earnings, benefits, pain, and suffering, as well as punitive damages. Now, on the eve of filing the complaint, you want to expand this litigation to include defendants and theories separate from what we had agreed was a discrimination claim. Clearly, this was your understanding also as evidenced by the statement in your last letter that you recently sought substitute counsel because you "anticipate that if [you] wanted to sue Washington Nat'l, VALIC, or Edison's co-conspirator, the E.T.E.A. or file at PERC [I] would claim conflict of interest."

We are prepared to complete the last step toward resolving the discrimination dispute by filing the complaint that names those parties and issues upon which we had focused over the last 15 months. Certainly, a recoupment of your seniority rights is part of the requested relief. Should you desire to expand the litigation to include additional parties and theories, you are certainly welcome to seek other counsel to do that. We would do everything possible to facilitate a smooth and orderly transition of the file.

0504370094

In order to protect your rights by April 18th, we will file the complaint which names those parties previously agreed upon and issues raised, unless you direct us, in writing, not to file the complaint.

We would prefer to meet personally with you before April 18, 1994, even though you have not scheduled an appointment as we have asked. We are still available to speak with you at your convenience.

Very truly yours,

Sharon Lynch Norton

SHARON LYNCH NORTON

SLN:rnf

9504370024 2

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Edward Renaud
508 Fox Avenue
Bilford, NJ 07718

4a. Article Number

P 074 523 68[illegible]

4b. Service Type

☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

4/16/91

5. Signature (Addressee)

Edward Renaud

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 *U.S. GPO: 1993—352-714 DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

9501337002 13

Exhibit E

FAX 908-571-8741

APRIL 15, 1999
508 FOX AVE.
BELFORD, N.J. 07718

DEAR MRS. NORTON,

PLEASE BE ADVISED THAT I HAVE FILED BEFORE THE COMMISSIONER OF EDUCATION C/O THE BUREAU OF CONTROVERSIES AND DISPUTES REGARDING DISCRIMINATION THAT BEGAN IN 1984.

IN YOUR LAST LETTER YOU WERE NOTABLY UNABLE TO SUPPORT THAT A FEDERAL FILING WOULD DO ANYTHING MORE THAN DAMAGE MY RIGHTS. I HAVE GIVEN YOU DOCUMENTS THAT WOULD POINT TO CONSPIRACY, COLLUSION, AIDING AND ABETTING WITH NO ADVICE OR RESULTS.

I EXPECTED PROTECTION OF MY RIGHTS AND ALL OF THEM, NOT THE SELF-SERVING LIMITED MENU THAT THE N.J.E.A. PROVIDES.

IF YOU WANT TO DISCUSS THE CORRECT COMPLAINT WITH THE CORRECT PLAINTIFF'S POSITION THAT IS FINE, BUT I AM NOT A ATTORNEY. AND CANNOT GIVE LEGAL

95043/00244

ADVICE TO YOU.

THE N. J. E. A. WILL CONTINUE TO BEAR THE RESPONSIBICITY FOR LEGAL ADVICE IN THIS MATTER. THE COSTS OF DEFENDING MY RIGHTS GROW BY THE DAY. THE COMPLETE LACK OF FILINGS ON RETALIATION, INTIMIDATION, & COERCION INDICATE THAT SOMEONE IS BEING PROTECTED HERE AND IT HASN'T BEEN ME.

IF YOU CHOOSE TO FILE IN FEDERAL COURT WITHOUT MY PERMISSION, AND OBSTRUCT MY RIGHTS I CANNOT STOP YOU. DOCUMENTS REGARDING CRIMINAL VIOLATIONS HAVE BEEN IGNORED, MY DESIRE TO PUT A STOP TO THIS 18 YEARS OF VIOLATION OF MY RIGHTS HAS BEEN IGNORED, AND I EXPECT LITTLE ELSE FROM THE N. J. E. A.

Edward Round.

2504370045

Exhibit F

CHAMLIN, ROSEN, CAVANAGH & ULIANO
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KENNETH W. CHAMLIN
N.J. & N.Y. BARS

ROBERT P. McKEVITT
SHARON LYNCH NORTON
N.J. & N.Y. BARS
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
N.J. & PA. BARS

April 19, 1994

Mr. Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718

Re: *Renaud v. Edison Township Board of Education*
Our File No. 26089

Dear Mr. Renaud:

Your facsimile letter was transmitted to this office at 4:36 p.m. on Friday, April 15, 1994. It is apparent from your letter that you received our letter of over a week ago. We had urged you therein to telephone us but you did not. By the time you faxed your last letter to us, thirty (30) minutes prior to the close of business on Friday, the complaint in the above named matter had already been sent to the Court for filing. Enclosed is a copy of that complaint, which contains revisions you suggested. In any event, in your letter you never explicitly stated whether you were directing us not to file the prepared complaint, an issue which could have been easily addressed had you just telephoned us in a timely fashion.

For the reasons that you recently advanced both in the March 17th meeting and your subsequent two letters, and your refusal to orally communicate with us about your case, as well as your filing on your own of administrative claim of discrimination, this firm cannot for ethical reasons represent you in this litigation or in any other forum, including the Departments of Labor and Education. Accordingly, we intend to bring a motion to be relieved as your counsel in the pending federal litigation and before the Department of Labor. As we have previously stated, we will gladly cooperate in transferring your file to any attorney of your choosing. Should you choose to proceed *pro se*, we will also cooperate with you in any way possible to effect an orderly transition of the file. Should you wish to withdraw the complaint, you can do so by writing to the Clerk of the Court, William T. Walsh, at the United States District Courthouse and P.O. Building, Newark, New Jersey 07102, referring to the complaint number. The Court Rules require that the complaint be served within 120 days of its

950437/00246

filing. We will not effect service of the complaint unless you direct us to do so in writing within the next ten (10) days. We will also delay the filing of our motion to be relieved for the next ten (10) days to give you an opportunity to decide whether you wish to withdraw the complaint or substitute other counsel or yourself in the action.

As you know, the State Department of Labor sent a notice of hearing concerning your unemployment benefits which we both received last week. As you further know, I sent you a copy of the notice which I received, advising you that neither Mr. Cavanagh nor I were available to attend on such short notice. I advised you that, unless you objected, we would seek an adjournment of the meeting. While this letter was being processed, you telephoned this office for the first time in over a month and left a message with my secretary that you agreed that the unemployment hearing should be adjourned. She then placed your call into Mr. Cavanagh and myself and I advised you that I had spoken to Mr. Ronald Gitter of the State Department of Labor this morning and told him of our unavailability on short notice. I told you that Mr. Gitter instructed me to telephone him tomorrow, April 19, 1994, and advise him if you would go alone. He said he would otherwise consider an adjournment. After confirming your desire to adjourn the hearing, I began to tell you of the status of the District Court complaint and my questions about your April 15th letter. You apparently hung up the telephone as a recording advised me to hang up and dial again. It appears you do not wish to discuss the substance of your case with us. To the same effect, we have no knowledge of the case which you tell us you have since brought before the Commissioner of Education.

We have had no communication with the NJEA concerning any of the above stated matters. You should contact them immediately regarding their providing further representation for you in any pending cases.

Very truly yours,

SHARON LYNCH NORTON

SLN/mmc
CERTIFIED MAIL
R.R.R. #P 317 780 430
cc: via regular mail

0504370092447

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Edward Renaud
508 Fox Avenue
Belfad, NJ 07718

4a. Article Number
P 317 780 430

4b. Service Type
☐ Registered ☐ Insured
☒ Certified
☐ Express

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

5. Signature (Addressee)

6. Signature (Agent)

PS Form 3811, November 1990 * U.S. GPO: 1991—287-488 DOMESTIC RETURN RECEIPT

P 317 780 430

Exhibit C

CHAMLIN, ROSEN, CAVANAGH & ULIANO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
268 NORWOOD AVENUE
P.O. BOX 38
WEST LONG BRANCH, N.J. 07764
(908) 229-3200
TELEFAX # (908) 571-8741

GEORGE M. CHAMLIN
CERTIFIED CIVIL TRIAL ATTORNEY
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KENNETH W. CHAMLIN
N.J. & N.Y. BARS

ROBERT P. McKEVITT
SHARON LYNCH NORTON
N.J. & N.Y. BARS
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
N.J. & PA. BARS

September 8, 1993

Nilsa Rivera, Sr. Investigator
N.J. Dept. of Law & Public Safety
Division on Civil Rights
CN-090
Trenton, New Jersey 08625-0090

Re: *Renaud v. Edison Township Board of Education*
Docket No. EM05HE-35524H
Our File No. 26089

Dear Ms. Rivera:

Pursuant to your request, enclosed please find a statement of withdrawal signed by Edward Renaud.

As previously advised, we are hereby requesting a right to sue letter. Please advise as to when we can expect to receive same.

Very truly yours,

SHARON LYNCH NORTON

SLN/mmc
encl.
cc: Mr. Edward Renaud

9504370049

REQUEST FOR WITHDRAWAL OF CHARGE OF DISCRIMINATION

You recently indicated a desire to withdraw your charge. In order to initiate such action, please furnish the information below.

Please note that your charge is presently open with the New Jersey Division on Civil Rights (NJDCR) and the Equal Employment Opportunity Commission (EEOC). If you desire to withdraw your charge with both agencies, it will be necessary to so indicate in the space provided below. Since a request for withdrawal of the charge is subject to the approval of the agencies named above, your request will be considered and acted upon when received. Note that both agencies are still prepared to proceed with your charge if you so desire.

Complainant's Name: Edward Renaud NJDCR # EM05HE-35524H

Respondent's Name: Edison Twp Bd of Ed. EEOC # 17E930862

COMPLAINANT COMPLETE INFORMATION BELOW (continue on reverse if necessary):

I am aware that the EEOC and the NJDCR protect my right to file a complaint. I have been advised that it is unlawful for any person covered by Title VII of the Civil Rights Act of 1964, as amended, or the Age Discrimination in Employment Act (ADEA) of 1967, as amended, to threaten, intimidate or harass me because I have filed a complaint. I have not been forced to request this withdrawal.

Also, I have been advised that it is unlawful for any person covered by the enabling legislation of the New Jersey Division on Civil Rights to threaten, intimidate or harass me because I have filed a complaint.

I request the withdrawal of my charge because I wish to obtain a Right to Sue letter.

I wish to withdraw my charge filed with the NJDCR.

X Edward Renaud (Signature) X SEPT. 1, 1993 (Date)

I wish to withdraw my charge filed with the EEOC.

(Signature) (Date)

JO10

0504370 0 0 2 5 0

CHAMLIN, ROSEN, CAVANAGH & ULIANO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
268 NORWOOD AVENUE
P.O. BOX 38
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(N.J. & N.Y. BARS)

ROBERT P. McKEVITT
SHARON LYNCH NORTON
(N.J. & N.Y. BARS)
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
(N.J. & PA. BARS)

October 21, 1993

Nilsa Rivera, Sr. Investigator
N.J. Dept. of Law & Public Safety
Division on Civil Rights
CN-090
Trenton, New Jersey 08625-0090

Re: *Renaud v. Edison Township Board of Education*
Our File No. 26089

Dear Ms. Rivera:

As you know, on September 8, 1993 I mailed to you the enclosed letter requesting a right to sue letter in the above named matter. In our follow-up conversation, you indicated that the letter would be forthcoming.

Inasmuch as we have not yet received said letter, can you give us any idea when we can expect to receive the same or, in the alternative, whom else we should contact?

Thank you for your courtesies in this matter.

Very truly yours,

SHARON LYNCH NORTON

SLN/mmc
encl.

9504370002 1

State of New Jersey

DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION ON CIVIL RIGHTS

CN 089
TRENTON, NJ 08625-0089

ROBERT J. DEL TUFO
ATTORNEY GENERAL

C. GREGORY STEWART
DIRECTOR

OCT 26 1989

Address Reply To:

Trenton Regional Office
CN-090
Trenton, NJ 08625-0090
(609) 292-4605

Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718

Re: EDWARD RENAUD vs EDISON TOWNSHIP BOARD OF EDUCATION
Docket Number: EM05HE-35524H

Dear Mr. Renaud:

Please take notice that our file in the above entitled matter has been closed based on your request to have your complaint Waived to EEOC.

Further, pursuant to this State's File Retention Schedule, it is the intention of the Division to destroy the above referenced file one (1) year after the date of closing or one (1) year after any other final court action, whichever is later.

Thank you for bringing this matter to our attention. If we can be of assistance to you in the future, please do not hesitate to call upon us.

Very truly yours,

Atley R. Tyler

Atley R. Tyler
Regional Manager

ART:NR/sav
K056
c: Sharon Lynch Morton, Esq.

9504370022

CHAMLIN, ROSEN, CAVANAGH & ULIANO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
288 NORWOOD AVENUE
P.O. BOX 38
WEST LONG BRANCH, N J 07764
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(N.J. & N.Y. BARS)

ROBERT P. McKEVITT
SHARON LYNCH NORTON
(N.J. & N.Y. BARS)
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
(N.J. & PA. BARS)

November 9, 1993

Mr. Edward McCaffrey
EEOC
1421 Cherry Street
Philadelphia, PA 10102

Re: *Renaud v. Edison Township Board of Education*
EEOC No. 17E930862
Our File No. 26089

Dear Mr. McCaffrey:

Please accept this letter as a follow-up to our conversation of last week. If you recall, my client is awaiting a right to sue letter from the Commission. His filing was with the New Jersey Civil Rights Division and his EEOC complaint number is listed above. His file was closed by the State Division on October 26, 1993 upon my client's request for a right to sue letter. Hopefully, that file has found its way to your offices by now.

Please advise me when my client can expect to receive the right to sue letter. Should you require any further information, please feel free to contact me.

Thank you for your courtesies in this matter.

Very truly yours,

SHARON LYNCH NORTON

SLN/mmc

9504370093

CHAMLIN, ROSEN, CAVANAGH & ULIANO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
268 NORWOOD AVENUE
P.O. BOX 38
WEST LONG BRANCH, N.J. 07764
(908) 229-3200
TELEFAX # (908) 571-8741

GEORGE M. CHAMLIN
CERTIFIED CIVIL TRIAL ATTORNEY
RONALD B. ROSEN
CERTIFIED CIVIL TRIAL ATTORNEY
FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
THOMAS W. CAVANAGH, JR.
(N.J., N.Y. & D.C. BARS)
CHARLES J. ULIANO
CERTIFIED CIVIL & CRIMINAL TRIAL ATTORNEY
KENNETH W. CHAMLIN
(N.J. & N.Y. BARS)

ROBERT P. McKEVITT
SHARON LYNCH NORTON
(N.J. & N.Y. BARS)
SAMUEL J. VACCARIANO
LAURA S. WITHERINGTON
(N.J. & PA. BARS)

December 7, 1993

Mr. Edward McCaffrey
EEOC
1421 Cherry Street
Philadelphia, PA 10102

Re: *Renaud v. Edison Township Board of Education*
EEOC No. 17E930862
Our File No. 26089

Dear Mr. McCaffrey:

On November 9, 1993 I wrote to you requesting when my client can expect to receive a right to sue letter in the above named matter. I understand from our previous conversation that this is an administrative process. I would appreciate the name of any other individual I can contact for further information as to where my client's request is in the process.

Thank you for your courtesies in this matter.

Very truly yours,

SHARON LYNCH NORTON

SLN/mmc

9504370023 4

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Philadelphia District Office
1421 Cherry Street, 10th Floor
Philadelphia, PA 19102
PH: (215) 656-7020
TDD: (215) 656-7114
FAX: (215) 656-7113

December 14,1993

Our Reference: Charge Number 17E930862
Renaud v. Edison Board of Education

Edward Renaud
508 Fox Avenue
Belford, NJ 07718

Dear Mr. Renaud:

The Equal Employment Opportunity Commission (EEOC) has received your attorney's request for the issuance of a Notice of Right-to-Sue in connection with the above-referenced charge. Because the Respondent in this charge is from the public sector, the Notice of Right-to-Sue must be issued by the U.S. Department of Justice. Therefore, the request has been forwarded to that Agency for action. The Department of Justice will act on your request as soon as possible and issue the Notice of Right-to-Sue directly to you. You will then have 90 days from your receipt of the Notice of Right-to-Sue to file suit in Federal District Court.

If you have any further questions concerning the issuance of the Notice of Right-to-Sue, you may write to the Department of Justice at the following address:

Department of Justice
Civil Rights Division
Employment Litigation Section
Room 4712
P.O. Box 65968
Washington, DC 20035-5968

Please note that with the issuance of the Notice of Right-to-Sue the EEOC will discontinue its administrative processing of this charge.

If you have any questions concerning the charge or the EEOC's processing, please call Edward McCaffrey at 215-656-7050.

Sincerely,

William D. Cook

William D. Cook
Enforcement Manager

cc: Sharon Lynch Norton, Esq.
Edison Board of EDucation

9504370055

Exhibit D

RECEIVED

MAY 06 1994

AT 8:30 ..... M

WILLIAM T. WALSH, CLERK

Edward Renaud
508 Fox Avenue
Belford, New Jersey 07718
908 495-2531

RECEIVED

MAY 11 1994

HICKINSON R. DEBEVOISE
U.S.D.J.

APRIL 29, 1994

94-1626(DRD)

TO: CLERK OF THE COURT
WILLIAM T. WALSH
UNITED STATES DISTRICT COURTHOUSE AND P.O. BUILDING
NEWARK, N.J. 07102

THE COMPLAINT FILED BY SHARON LYNCH NORTON, ESQ (6030) WAS FILED WITHOUT MY KNOWLEDGE OR CONSENT. I HAVE STATED TO SHARON LYNCH NORTON THAT I COULD NOT LEGALLY BE PARTY TO THE COMPLAINT THAT SHE HAD PREPARED BECAUSE IT CONCEALED CRIMINAL VIOLATIONS OF STATE AND FEDERAL LAWS. I HAVE WITHOUT ANY ASSISTANCE OR LEGAL COUNSEL FILED A COMPLAINT BEFORE THE COMMISSIONER OF EDUCATION OF NEW JERSEY THAT INCLUDES THE CORRECT CHARGES IN THIS MATTER INCLUDING CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS. I HAVE ALSO MADE REPEATED ATTEMPTS TO CONTACT THE STATE AND FEDERAL DISTRICT ATTORNEYS TO MAKE THE CORRECT CRIMINAL CHARGES OR OBTAIN INFORMATION ON A MEANS OF FILING THOSE CHARGES. IN EVERY CIRCUMSTANCE I HAVE HAD NO REPLY OR I WAS INFORMED THAT I HAD THE WRONG JURISDICTION. IT WOULD APPEAR THAT THERE IS NO JURISDICTION THAT ALLOWS HANDICAPPED INDIVIDUALS TO FILE ANY CHARGES CIVIL OR CRIMINAL.

SHARON LYNCH NORTON HAS REPRESENTED IN THIS MATTER FOR THE PAST 15 MONTHS AND DURING THAT TIME I HAVE PLACED DOCUMENTS IN HER POSSESSION THAT DIRECTLY POINT TO CONSPIRACY; I HAVE SUPPLIED DOCUMENTS, MAIL STATEMENTS REGARDING INVASION OF PRIVACY, DESTRUCTION OF SWORN TESTIMONY, FRAUD AND THEFT OF RECORDS FROM MY HOME THAT RELATE TO THE ACTIONS OF THE EDISON BOARD OF EDUCATION AND THE EDISON TOWNSHIP EDUCATION ASSOCIATION. AS A COURSE OF EVENTS I HAVE HAD NO ASSISTANCE IN FILING THE CORRECT CHARGES; MRS. NORTON

HAS REFUSED TO ACCEPT DOCUMENTS, AND REFUSED TO DISCUSS MY CASE WITH ME. WHEN I STATED THAT I BELIEVED THAT THE STATE OF NEW JERSEY PUBLIC EMPLOYEE RELATIONS COMMITTEE HAD JURISDICTION IN THIS MATTER MRS. NORTON THREATENED TO CLAIM A CONFLICT OF INTEREST SO AS TO END HER REPRESENTATION.

I CANNOT OBTAIN ANY ATTORNEY TO REPRESENT ME IN THIS MATTER. DESPITE A SUBSTANTIAL EFFORT ON MY PART. ALTHOUGH A VARIETY OF REASONS HAVE BEEN GIVEN I CAN STATE BY MY EXPERIENCE THAT THEY DECINE TO REPRESENT ME WHEN I STATE THE CORRECT EVENTS IN THIS MATTER; THAT I WAS DENIED THE RIGHT TO FILE THE CORRECT CHARGES THRU THE E.E.OC. AND N.J. DIVISION OF CIVIL RIGHTS., THAT THERE WAS A FRAUDULENT REMOVAL OF MY FUNDS FROM MY ANNUITY BY THE EDISON BOARD OF EDUCATION THAT THE NEW JERSEY DEPARTMENT OF LABOR HAD WITHELD UNEMPLOYMENT COMPENSATION PAYMENTS FOR 8 MONTHS, THAT THE N.J.E.A PAID ATTORNEY STEPHEN KLAUSNER APPARANTLY FILED A COMPLAINT IN MIDDLESEX COUNTY SUPERIOR COURT WITHOUT MY KNOWLEDGE OR CONSENT ON A AFFADAVIT THAT I HAD NOT SEEN OR SIGNED, AND THAT THE N.J.E.A. PAID ATTORNEYS SHARON LYNCH NORTON AND THOMAS CAVANAGH HAD NOT FILED ANY COMPLAINT OR ALLOWED ANY RECORD TO EXIST OF RETALIATION, COERCION, HARRASSMENT OR INTERFERENCE WITH MY RIGHTS.

I AM NOW IN A SITUATION THAT I ANTICIPATED; THAT THE ATTORNEY SHARON LYNCH NORTON HAS FILED A FALSE COMPLAINT IN UNITED STATES DISTRICT COURT, A COMPLAINT THAT CONCEALS A CONSPIRACY TO OBSTRUCT MY RIGHTS THAT BEGAN IN 1984 WHEN THE EDISON TOWNSHIP EDUCATION ASSOCIATION AND THE EDISON TOWNSHIP EDUCATION ASSOCIATION ACTED TO END MY EMPLOYMENT BY VIOLATING N.J.S.A. 18A:28-12 TO ALTER MY SENIORITY AND RETAINED TEACHERS IN POSITIONS WHO LACKED CERTIFICATION SO AS TO SUBJECT

950437007 57

ME TO A REDUCTION-IN-FORCE. IN MY PRELIMINARY FILING OF APRIL 15, 1994 I MAKE THAT ALLEGATION IN MY PETITION BEFORE THE COMMISSIONER OF EDUCATION AND EXPECT THAT I WILL BE FORCED TO APPEAR "PRO SE" AT THAT VENUE. THROUGHOUT THIS DISPUTE I HAVE HAD NO INPUT AS TO THE COURSE OF ACTIONS BY MRS SHARON LYNCH NORTON WHO HAS BEEN PAID BY THE NEW JERSEY EDUCATION ASSOCIATION AND NO REASONABLE MEANS OF PROTECTING MY RIGHTS.

I AM FORCED TO DROP THE COMPLAINT FILED MY SHARON LYNCH NORTON AS I HAVE NO REASONED BELIEF THAT ANY ATTORNEY WILL REPRESENT ME BECAUSE OF THE ACTIONS OF N.J.E.A PAID ATTORNEYS WHO HAVE ACTED TO OBSTRUCT MY RIGHTS. AS I EXPECTED MRS NORTON HAS FILED THIS COMPLAINT TO OBSTRUCT MY FILING BEFORE THE COMMISSIONER OF EDUCATION; HER FAILURE TO ACT OR FILE THE TRUE AND CORRECT COMPLAINT HAS RESULTED IN A LOSS TO ME OF APPROXIMATELY $60,000^{00}$.

I BELIEVE THAT THE CORRECT JURISDICTION FOR THIS DISPUTE IS THE NEW JERSEY COMMISSIONER OF EDUCATION AS THERE ARE SIGNIFICANT VIOLATIONS OF TITLE 18A: "SCHOOL LAW" AND THE "LAW AGAINST DISCRIMINATION" I AM HANDICAPPED AND HAVE NO KNOWLEDGE OF FEDERAL COURT PROCEDURES; I HAVE EXPRESSED MY CONCERNS TO MRS NORTON AND BEEN IGNORED. MRS. NORTON HAS MOST RECENTLY REFUSED MY SPECIFIC REQUEST TO STATE IN WRITING THAT THE COMPLAINT SHE FILED WOULD SERVE A PURPOSE OTHER THAN OBSTRUCTING MY RIGHT TO FILE IN ANY OTHER VENUE. SHE HAS REFUSED TO REPLY TO THAT REQUEST AND IN A LETTER OF APRIL 19, 1994 CLAIMED "ETHICAL REASONS" FOR HER COMPLETE REFUSAL TO ACT IN MY BEHALF AND HAS REFUSED TO REPRESENT ME. IN MY LAST MEETING WITH MRS NORTON SHE THREATENED TO CLAIM A CONFLICT OF INTEREST

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APRIL 23, 199-

SPECIFICALLY STATING THAT IF I "TURNED ON HER" SHE COULD BE IMPLICATED IN CONSPIRACY TO OBSTRUCT OR RACKATEERING BECAUSE OF HER ACTIONS IN THIS MATTER. I BELIEVE HER STATEMENT TO BE CORRECT AND THAT THIS IS THE BASIS FOR THE CLAIM OF "ETHICAL REASONS".

MRS. NORTON'S THREAT HAS BEEN CARRIED OUT; BECAUSE I REFUSED TO BE COERCED INTO BEING PARTY TO CONSPIRACY TO OBSTRUCT MY RIGHTS I NOW HAVE NO LEGAL REPRESENTATION, CANNOT OBTAIN REPRESENTATION, AND WILL HAVE A LIMITED ABILITY TO DEFEND MY RIGHTS BECAUSE I AM HANDICAPPED.

SHOULD THE COMMISSIONER OF EDUCATION FAIL TO HEAR IN THIS MATTER I WILL CONTINUE TO ATTEMPT TO PROTECT MY RIGHTS "PRO SE". MY EXPERIENCE HAS BEEN THAT AS A HANDICAPPED PERSON I HAVE NO RIGHTS UNDER FEDERAL OR STATE LAW, AND NO PROTECTION FROM A CRIMINAL CONSPIRACY TO OBSTRUCT MY RIGHTS.

SINCERELY,

Edward Renaud

EDWARD RENAUD

9504370029

Exhibit E

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

CHAMBERS OF
DICKINSON R. DEBEVOISE
JUDGE

MARTIN LUTHER KING JR.
FEDERAL BUILDING & U.S.COURTHOUSE
50 WALNUT ST., ROOM 5063
P.O. BOX 999
NEWARK, N.J. 07101-0999
(201) 645-6121

June 15, 1994

RE: Renaud v. Edison Township Board of Education, et al.
Civil Action No. 94-1626

Sharon Lynch Norton, Esq.
Chamlin, Rosen, Cavanagh & Uliano
268 Norwood Avenue
P.O. Box 38
West Long Branch, NJ 07764

Dear Ms. Norton:

Thank you for your informative letter of May 31. I appreciate the detailed account of the origin of the lawsuit. In view of Mr. Renaud's position that he does not wish to prosecute the matter, I have prepared an order of dismissal.

Very truly yours,

Dickinson R. Debevoise
U.S.D.J.

DRD:el
c.c. Mr. Edward Renaud

Enc.

0504370000

[redacted]AMLIN, ROSEN, CAVANAGH & ULIA[redacted]
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
268 NORWOOD AVENUE
P.O. BOX 38
WEST LONG BRANCH, N.J. 07764
(908) 229-3200

GEORGE M. CHAMLIN
CERTIFIED CIVIL TRIAL ATTORNEY
RONALD B. ROSEN
CERTIFIED CIVIL TRIAL ATTORNEY
FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
THOMAS W. CAVANAGH, JR.
(N.J., N.Y. & D.C. BARS)
CHARLES J. ULIANO
CERTIFIED CIVIL & CRIMINAL TRIAL ATTORNEY
KENNETH W. CHAMLIN
(N.J. & N.Y. BARS)
SHARON LYNCH NORTON
(N.J. & N.Y. BARS)

ROBERT P. McKEVITT
SAMUEL J. VACCHIANO
LAURA S. WITHERINGTON
(N.J. & PA. BARS)

TELEFAX # (908) 571-8741

APR 21 12 23 PM '95
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

April 19, 1995

Ms. Alva E. Smith
Office of General Counsel
999 E. Street N.W.
Washington, D.C. 20463

Re: MUR 4196 -- Sharon Lynch Norton
Thomas W. Cavanagh, Jr.

Dear Ms. Smith:

This will confirm my telephone conversation with you this morning. At that time you indicated that you had received the joint response submitted by me and Thomas W. Cavanagh, Jr. in connection with the captioned matter.

Very truly yours,

Sharon Lynch Norton

SHARON LYNCH NORTON

SLN:cr
Also by fax

9504370029 1

DANIEL P. JACOBSON
ATTORNEY AT LAW
401 SUNSET AVENUE
ASBURY PARK, N.J. 07712
(908) 774-8200
FAX # (908) 774-6960

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL COUNSEL
APR 21 12 17 PM '95

April 12, 1995

Mary L. Taksar, Attorney
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Re: MUR 4196 -- Pallone for Congress

Dear Ms. Taksar:

I represent the Pallone for Congress Campaign Committee ("Committee") in regard to the above-captioned matter under review.

The basis of this matter is a complaint filed by Mr. Edward Renaud of Belford, New Jersey. The Committee takes the position that the complaint filed by Mr. Renaud makes no allegations whatsoever that could be construed as a violation of federal election law. The complaint is basically a set of unsubstantiated conspiracy theories that are completely false and have no merit. Said theories involve Mr. Renaud's belief that he was not treated properly regarding proceedings associated with his former employment in Edison Township, New Jersey.

Mr. Renaud is dissatisfied with various outcomes of his legal proceedings, and he believes that there is some type of conspiracy against him. However, this does not give rise to a federal election commission violation. The Committee thus asks that no further action be taken on MUR 4196.

Very truly yours,

DANIEL P. JACOBSON

DJ/st
forms/fedelecc
cc: John E. Tully
Honorable Frank Pallone, Jr.

95043700962

Carol J. Ward
Corporate Secretary
CIGNA Corporation

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COMMISSION
ADMINISTRATIVE

CIGNA

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April 19, 1995

OLP55
1650 Market Street
Philadelphia, PA 19192-1550
Telephone 215.761.[illegible]31
Facsimile 215.761.55[illegible]

APR 21 12 2[illegible]95
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COMMISSION
OFFICE OF GENERAL COUNSEL

**VIA FACSIMILE**

Federal Election Commission
Office of General Counsel
Washington, D.C. 20463

Re: MUR 4196

**RESPONSE OF RESPONDENT**
**CONNECTICUT GENERAL LIFE INSURANCE COMPANY**

1. Connecticut General Life Insurance Company (hereinafter "Respondent") is a corporation formed in the State of Connecticut and qualified to do business in the State of New Jersey.

2. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 1 of the Complaint and therefore denies said allegations.

3. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 2 of the Complaint and therefore denies said allegations.

4. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 3 of the Complaint and therefore denies said allegations.

5. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 4 of the Complaint and therefore denies said allegations.

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6. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 5 of the Complaint and therefore denies said allegations.

7. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 6 of the Complaint and therefore denies said allegations.

8. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 7 of the Complaint and therefore denies said allegations.

9. Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 8 of the Complaint and therefore denies said allegations.

The Statement of Designation of Counsel, along with the signed original of this response, will be sent tomorrow via overnight courier.

Respectfully,

Carol J. Ward

9504370002564

**[illegible]**

SEC 4196

NAME OF COUNSEL: Carol J. Ward

ADDRESS: CIGNA Corporation,
1650 Market Street, P.O. Box 7716
Philadelphia, PA 19192-1550

TELEPHONE: (215) 761-6031

RECEIVED
FEDERAL ELECTION
COMM.
ADMINISTRATION
Apr 21 9 35 PM '95

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

April 19, 1995
Date

Signature
Lawrence P. English
Chairman of the Board

RESPONDENT'S NAME: Connecticut General Life Insurance Company

ADDRESS: 900 Cottage Grove Road
Hartford, CT 06152-1216

HOME PHONE:

BUSINESS PHONE: (203) 726-4235

APR 21 12 24 PM '95
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

95043700965

OLDAKER, RYAN & LEONARD
ATTORNEYS AT LAW
818 CONNECTICUT AVENUE, N.W.
SUITE 1100
WASHINGTON, D.C. 20006

(202) 728-1010
FACSIMILE (202) 728-4044

April 24, 1995

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL

Ms. Alva Smith
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 4196
Stephen D. Bickel, President
The Variable Life Insurance Company

Dear Ms. Smith:

This is a request on behalf, of the above named Respondent, for an extension of time to respond to the complaint in this matter.

The Respondents received the Commission's notification on April 13, 1995, making the response due on April 28, 1995. However, due to other deadlines facing Counsel and already set vacation plans, we will need additional time to sufficiently respond to this matter. We apologize for this delay. We are requesting an extension of twenty days from the original due date, making the response due on May 19, 1995.

We would greatly appreciate your assistance in granting us this additional time to respond.

Sincerely,

Marianne Koepf

Marianne Koepf
Law Clerk to Lyn Utrecht

95043700266

# STATEMENT OF DESIGNATION OF COUNSEL

MUR 4196

NAME OF COUNSEL: Lyn Utrecht

ADDRESS: 818 Connecticut Avenue, NW
Suite 1100
Washington, DC 20006

TELEPHONE: (202) 728-1010

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

April 11, 1995
Date

Signature
William A. Wilson, Vice President and
General Counsel

RESPONDENT'S NAME: The Variable Life Insurance Company

ADDRESS: 2929 Allen Parkway
Houston, Texas 77019

HOME PHONE:

BUSINESS PHONE: (713) 831-5491

9504370092967

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

*April 26, 1995*

Lyn Utrecht, Esq.
818 Connecticut Avenue, N.W.
Suite 1100
Washington, D.C. 20006

RE: MUR 4196
The Variable Life Insurance Co.

Dear Ms. Utrecht:

This is in response to your letter dated April 24, 1995, requesting an extension until May 19, 1995, to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on May 19, 1995.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Alva E. Smith, Paralegal
Central Enforcement Docket

9504370068

Washington National
INSURANCE COMPANY

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
APR 25 12 37 PM '95

PAULA BERLOW SHOPIRO
Vice President and Counsel
Telephone: (708) 793-3279
Facsimile: (708) 793-3737

April 24, 1995

General Counsel's Office
Federal Election Commission
999 E. Street N.W.
Washington, D.C. 20463
Attention: Ms. Alva Smith
Paralegal

**VIA FEDERAL EXPRESS**

Re: MUR 4196/Edward Renaud

Dear Ms. Smith:

I am in receipt of the complaint filed by Edward Renaud with the Federal Election Commission. After reviewing the voluminous materials accompanying the complaint, I will summarize the allegations against Washington National:

1. Mr. Renaud alleged that Washington National made campaign contributions to Congressman Pallone's re-election campaign fund as part of a conspiracy against Mr. Renaud;

2. Mr. Renaud alleged that Washington National improperly paid his disability claim;

3. Mr. Renaud alleged that Washington National is involved in a fraud with the Edison Township Education Association ("E.T.E.A.") and the New Jersey Education Association ("N.J.E.A."), and as a result, paid $18,000 in benefits to Mr. Renaud. Mr. Renaud raised the concern that Washington National might later demand that he pay this amount back.

I will respond to these allegations on behalf of Washington National in the above order.

First, according to our records, Washington National has never made any campaign contribution to Congressman Pallone. In addition, Washington National specifically denies being involved in any type or kind of conspiracy against Mr. Renaud. Washington National has no interest and does not intend, on harming Mr. Renaud in any way.

Second, in regard to the payment of Mr. Renaud's insurance benefits, it is Washington National's position that the Federal Election Commission does not have jurisdiction over a complaint regarding an insurance claim. Washington National reserves this objection, but in an effort to assist the Commission, responds to Mr. Renaud's allegation as such: Mr. Renaud has coverage with Washington National under Plan #4587, which is a



9504370009 9

voluntary disability insurance plan. Mr. Renaud was paid a total of $17,600.00 for a period of disability ending October 14, 1993. Washington National paid the amount due Mr. Renaud in accordance with the terms of the policy.

Finally, Washington National is not involved in any fraud with the N.J.E.A. or the E.T.E.A.. At this time, there is no intention to pursue the return of any money from Mr. Renaud. Washington National paid Mr. Renaud the amount due under his insurance policy in good faith, and considers Mr. Renaud's file closed for that claim.

It is our position that no action should be taken against Washington National in this matter. Mr. Renaud has not provided any material which supports any of the above allegations, or any other allegations in his complaint against Washington National. There are no materials which could be submitted on Washington National's behalf regarding any alleged conspiracy, as none exist. Washington National is not submitting any materials regarding the payment of Mr. Renaud's claim, as it is not within the jurisdiction of the Federal Election Commission to address such issues.

Washington National understands that this matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(4)(B) and Section 437g(a)(12)(A). Please see the attached designation of counsel sheet. I am interested in hearing from a representative of the Commission if there is a need for any further information or material.

Please feel free to contact me with any questions or correspondence regarding this complaint.

Very truly yours,

Paula Shopiro

Paula Shopiro

2504370092/0

# STATEMENT OF DESIGNATION OF COUNSEL

MUR 4196

NAME OF COUNSEL: Paula Shopiro, Esq. Vice President and in-house counsel

ADDRESS: Washington National Insurance CO.
300 Tower Parkway
Lincolnshire, IL 60069-3665

TELEPHONE: (708)793-3279

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
APR 25 12 37 PM '95

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Date

Signature

RESPONDENT'S NAME: Robert Patin, President

ADDRESS: Washington National Insurance Co.
300 Tower Parkway
Lincolnshire, IL 60069-3665

HOME PHONE:

BUSINESS PHONE: (708) 793-3000

95043700971

OLDAKER, RYAN & LEONARD
ATTORNEYS AT LAW
818 CONNECTICUT AVENUE, N.W.
SUITE 1100
WASHINGTON, D.C. 20006

(202) 728-1010
FACSIMILE (202) 728-4044

May 22, 1995

May 22 4 32 PM '95

Mr. Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 4196
The Variable Annuity Life Insurance Company
Stephen D. Bickel, President

Dear Mr. Noble:

This response is submitted on behalf of The Variable Annuity Life Insurance Company ("VALIC") and Mr. Stephen D. Bickel, President, in response to the complaint filed with the Federal Election Commission ("FEC" or the "Commission") in the above-referenced matter. Upon review of the complaint and the accompanying documents submitted by Mr. Edward Renaud (or the "Complainant"), we find that the Mr. Renaud has failed to set forth any facts or allegations against VALIC which would constitute a violation of the Federal Election Campaign Act of 1977, as amended ("FECA" the "Act"). Therefore, we ask the Commission to find no reason to believe and to close its file as to this matter.

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**BACKGROUND**

VALIC, a wholly-owned subsidiary of American General Insurance, Inc., is a Texas corporation which offers variable annuities, alternative retirement plans, to school systems. The Edison (New Jersey) Township Board of Education, the school system where the Complainant was employed, purchased such a plan from VALIC. While the complaint provides a great deal of information and accompanying attachments, very little of the information relates in any way to VALIC or to any activity even arguably subject to the Act. For purposes of responding to what we construe the allegations to be, however, we offer the following summary of Mr. Renaud's allegations.

Mr. Renaud had been employed as a teacher by the Edison Township Board

of Education (the "Board") from 1974 until September 1, 1992, when he was suspended without pay for the 1992-1993 school year. It appears from the documents filed with the complaint that Mr. Renaud returned to teaching sometime during the 1993-94 school year. Mr. Renaud states that his medical record indicated that he was a high health risk because he was diagnosed with cancer in 1979, and with narcolepsy, diabetes and hypertension in 1984. It appears that he has fully recovered from his cancer, but still suffers from his other diseases. Mr. Renaud asserts that his poor medical record led to increased insurance costs paid by the Board, resulting in harassment and attempts by the Board to force him from his position since 1984. He alleges that these attempts were in violation of New Jersey state laws protecting tenured teachers.

Mr. Renaud further alleges that the Board used his health disabilities, in violation of the American Disabilities Act, to justify his termination when they assigned him to teach at a new school where a demanding teaching schedule was not conducive to his medical condition. It is not clear from the documents whether the suspension during the 1992-1993 school year was due to his inability to perform his teaching assignments or to a reduction in teaching positions. Both events seem to have occurred simultaneously.

Either way, Mr. Renaud claims that he was entitled to, but did not receive, a paycheck for the period from September 1 to September 15, 1992. He learned that the paycheck had been issued when he received a statement from VALIC indicating that a deposit of funds had been made to his annuity account. These funds were later withdrawn by the Board due to an error in depositing the funds in the first place. Mr. Renaud alleges that VALIC fraudulently removed the funds and then tried to conceal their actions by denying his request for a copy of the computer record showing the withdrawal and a request for the name of the person authorizing such withdrawal.

Mr. Renaud states that he tried to remedy the above-alleged violations through the legal process. However, he alleges that the attorneys assigned to his case by the Edison County Education Association ("E.C.E.A.") failed to adjudicate or pursue alternative methods to resolve this matter. Due to inaction by the attorneys, he states that he approached Congressman Frank Pallone (Sixth District, NJ) to request an investigation into this matter. He further states that while Congressman Pallone's staff initially offered assistance, they failed to pursue this matter after January 1993.

Mr. Renaud alleges that VALIC, Congressman Pallone, the attorneys, as well as other insurance companies and parties not listed here, conspired with the Board

9504370097 3

and the E.C.E.A. to terminate his employment. He asserts that VALIC and the other insurance companies offered political and financial support to Congressman Pallone during his 1994 primary and general elections in return for his aid in concealing the conspiracy. The conspiracy charges against VALIC, while unsubstantiated and totally invalid, are charges not even arguably under the jurisdiction of the Commission, and thus, are not addressed herein.

Mr. Renaud's only mention of VALIC in connection with FECA is the allegation that VALIC (and other insurance companies) offered political and financial support to Congressman Pallone.[1] It is not at all clear whether he is alleging a prohibited corporate contribution or what other type of "support" he contends may have been provided to the Congressman. The complaint provides absolutely no evidence of any contribution or support provided to Congressman Pallone by VALIC. In fact, it does not even specify what violation of the Act is supposed to have occurred.

**RESPONSE**

The Act prohibits corporations from making contributions in connection with elections to federal office. 2 U.S.C. §441b(a). The Act does, however, permit a corporation to establish a separate segregated fund for the purpose of making such contributions. 2 U.S.C. §441b(b). When separated segregated funds are established by separate organizations controlled by the same entity, they are considered affiliated and share a single contribution limitation. 11 C.F.R. 100.5 (g)(2) and 100.5 (g)(3). Separated segregated funds which have attained multicandidate committee status may make contributions up to $5,000 per election to federal candidates. 11 C.F.R. 100.2 (b).

VALIC, a corporation, does not have a separate segregated fund for the purpose of making federal political contributions. Its parent company, American General Insurance, has a separate segregated fund, American General Political Action Committee ("AGPAC") which is registered with the Federal Election Commission. While it is entirely unclear from the facts of the complaint what entity allegedly made impermissible contributions under the Act, in fact, neither VALIC nor American General made any contributions or provided any support whatsoever to Congressman Pallone.

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[1] This complaint does not meet the requirements of 11 C.F.R. §111.4 in that it does not even state facts that would constitute a violation of the Act.

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Although it would have been entirely lawful, AGPAC did not make any contributions to Congressman Pallone for the 1994 primary or general elections. *See* Exhibit 1. Indeed, officials of VALIC and AGPAC did not even know who Congressman Pallone was when they first reviewed this complaint. Finally, Mr. Renaud states that Congressman Pallone has publicly thanked the E.C.E.A. for their support. He offers no similar evidence that Congressman Pallone has ever acknowledged receiving political or financial support from VALIC, and could not do so, since no support was ever given.

Congressman Pallone's FEC reports from the 1994 election cycle clearly demonstrate that he never received a political contribution from VALIC or AGPAC. *See* Exhibit 2. In fact, there is simply no relationship between VALIC and Congressman Pallone whatsoever, and there is no substance to Mr. Renaud's allegation of any violation of the Act.

**CONCLUSION**

In sum, Mr. Renaud's complaint does not set forth any facts constituting a violation of the Act and we urge the Commission to dismiss it immediately.

Sincerely.

Lyn Utrecht

Lyn Utrecht

Attachments

9504370075

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# EXHIBIT 1

## 1993-1994
## Contributions from AGPAC to Federal Candidates

93038301201

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

Feb 25 11 25 AM

1. NAME OF COMMITTEE (in full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2929 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00284869

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

## 4. TYPE OF REPORT

(a)
☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☒ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

95030433873000 2/18/93

## SUMMARY

Covering Period 1/01/93 through 1/31/93

| | | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|---|
| 5. | (a) Cash on Hand January 1, 1993 | | $ 35,163.16 |
| | (b) Cash on Hand at Beginning of Reporting Period | $ 35,163.16 | |
| 6. | (c) Total Receipts (from Line 19) | $ 8,288.23 | $ 8,288.23 |
| | (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 43,451.39 | $ 43,451.39 |
| 7. | Total Disbursements (from Line 30) | $ 20.00 | $ 20.00 |
| 8. | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 43,431.39 | $ 43,431.39 |
| 9. | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L. Brown

Date
2/18/93

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 1/1/91)

93038301205

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American General Political Action Committee C 00208892

| | A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|---|
| ** | BART GORDON'S COMMITTEE<br>P.O. BOX 2006<br>MURFREESBORO TN 37133 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 01/14/98 | $20.00 |
| | B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $20.00 |
| TOTAL This Period (last page this line number only) | $20.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1).

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# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

Mar 27 1 46 PM '93

1. NAME OF COMMITTEE (in full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2929 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00024299

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

## 4. TYPE OF REPORT

(a)
☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☒ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

## SUMMARY

5. Covering Period 01/01/93 through 03/20/93

| | | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|---|
| 6. | (a) Cash on Hand January 1, 1993 | | $ 35,163.16 |
| | (b) Cash on Hand at Beginning of Reporting Period | $ 43,431.39 | |
| | (c) Total Receipts (from Line 19) | $ 7,301.37 | $ 15,599.60 |
| | (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 50,732.76 | $ 50,762.76 |
| 7. | Total Disbursements (from Line 30) | $ 9,776.83 | $ 9,796.83 |
| 8. | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 40,955.93 | $ 40,955.93 |
| 9 | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
March 15, 1993

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 1/1/91)

93038321346

# SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page | PAGE 1 OF 1 | FOR LINE NUMBER: 22

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
American General Political Action Committee C 00281592

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>FIELDS FOR SENATE<br>P.O. BOX 2626<br>HUMBLE TX 77347 | U.S. Senator<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): Special Election – May 1, 1993 | 02/08/93 | $5,000.00 |
| B. Full Name, Mailing Address and ZIP Code<br>GENE GREEN ELECTION CONTEST<br>P.O. BOX 16128<br>HOUSTON TX 77222-6128 | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | Date (month, day, year)<br>02/08/93 | Amount of Each Disbursement this Period<br>$500.00 |
| C. Full Name, Mailing Address and ZIP Code<br>NATIONAL REPUBLICAN SENATORIAL COMMITTEE<br>425 SECOND STREET, N.E.<br>WASHINGTON DC 20002 | Purpose of Disbursement<br>U.S. Senator / Multi-Candidate<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): Annual contribution | Date (month, day, year)<br>02/08/93 | Amount of Each Disbursement this Period<br>$1,000.00 |
| D. Full Name, Mailing Address and ZIP Code<br>** BART GORDON'S COMMITTEE<br>P O BOX 2008<br>MURFREESBORO TN 37133 | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | Date (month, day, year)<br>02/17/93 | Amount of Each Disbursement this Period<br>$20.00 |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $6,520.00 |
| TOTAL This Period (last page this line number only) | $6,520.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1).

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93038350392

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

| 1. NAME OF COMMITTEE (In full) | |
|---|---|
| American General Political Action Committee | |
| ADDRESS (number and street) ☐ Check if different than previously reported | 2. FEC IDENTIFICATION NUMBER |
| 2929 Allen Parkway | C 00284869 |
| CITY, STATE and ZIP CODE | 3. ☐ This committee qualified as a multicandidate committee [illegible] This Reporting Period on _____ (date). |
| Houston, TX 77019 | |

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☒ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

| SUMMARY | | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|---|
| Covering Period 1/1/93 through 3/31/93 | | | |
| (a) | Cash on Hand January 1, 1993 | | $ 35,100.16 |
| (b) | Cash on Hand at Beginning of Reporting Period | $ 40,986.82 | |
| (c) | Total Receipts (from Line 19) | $ 7,250.00 | $ 32,970.49 |
| (d) | Subtotal (add Lines c(a) and c(b) for Column A and Lines c(a) and c(b) for Column B) | $ 48,236.82 | $ 68,080.65 |
| 7. | Total Disbursements (from Line 28) | $ 6,115.00 | $ 15,911.83 |
| 8. | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line d(d)) | $ 42,121.82 | $ 42,121.82 |
| 9. | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant) — Date

Robert L. Brown — 4-12-93

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 1/1/91)

93038350399

# SCHEDULE B — ITEMIZED DISBURSEMENTS

| The separate schedule(s) for each category of the Detailed Summary Page | PAGE 1 OF 1 |
|---|---|
| | FOR LINE NUMBER: 23 |

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Americans Against Political Action Committee C 00000000

| | A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|---|
| ** | BART GORDON'S CAMPAIGN<br>P.O. BOX 2666<br>MURFREESBORO TN 37133 | U.S. Representative<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 03/05/93 | $20.00 |
| | B. Full Name, Mailing Address and ZIP Code<br>THE HOYERMAN COMMITTEE<br>21 EAST 40TH ST. SUITE 2104<br>NEW YORK NY 10016 | Purpose of Disbursement<br>U.S. Senator<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | Date (month, day, year)<br>03/12/93 | Amount of Each Disbursement this Period<br>$1,000.00 |
| | C. Full Name, Mailing Address and ZIP Code<br>ROTH SENATE COMMITTEE<br>499 SECOND STREET, NE<br>WASHINGTON DC 20002 | Purpose of Disbursement<br>U.S. Senator<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | Date (month, day, year)<br>03/12/93 | Amount of Each Disbursement this Period<br>$1,000.00 |
| | D. Full Name, Mailing Address and ZIP Code<br>THE BURNS COMMITTEE<br>P.O. BOX 2811<br>BILLINGS MT 59103 | Purpose of Disbursement<br>U.S. Senator<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | Date (month, day, year)<br>03/12/93 | Amount of Each Disbursement this Period<br>$1,000.00 |
| | E. Full Name, Mailing Address and ZIP Code<br>TEXAS REPUBLICAN CONGRESSIONAL COMMITTEE<br>AKA – TEXAS FIRST FEC# C00143743<br>211 EAST 7TH ST. #308<br>AUSTIN TX 78701 | Purpose of Disbursement<br>Federal Multi-Candidate<br>Disbursement for: [ ] Primary [ ] General [X] Other (specify): Special Election – May 1, 1993 | Date (month, day, year)<br>03/12/93 | Amount of Each Disbursement this Period<br>$1,000.00 |
| | F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $4,020.00 |
| TOTAL This Period (last page this line number only) | $4,020.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1).

93038350399

93038403439

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

| 1. NAME OF COMMITTEE (In Full) | |
|---|---|
| American General Political Action Committee | |
| ADDRESS (number and street) ☐ Check if different than previously reported | 2. FEC IDENTIFICATION NUMBER |
| 2929 Allen Parkway | C 00084228 |
| CITY, STATE and ZIP CODE | 3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date) |
| Houston, TX 77019 | |

## 4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☒ May 20 | ☐ September 20 | ☐ January 31 |

- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

| SUMMARY | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| Covering Period 4/01/93 through 4/30/93 | | |
| 6. (a) Cash on Hand January 1, 1993 | | $ 35,163.18 |
| (b) Cash on Hand at Beginning of Reporting Period | $ 42,121.82 | |
| (c) Total Receipts (from Line 19) | $ 7,263.44 | $ 30,133.93 |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 49,385.26 | $ 65,297.09 |
| 7. Total Disbursements (from Line 30) | $ 2,520.00 | $ 18,431.83 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 46,865.26 | $ 46,865.26 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L. Brown

Date
May 18, 1993

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 1/1/91)

93038403447

# SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American General Political Action Committee C 00201328

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>** BART GORDON'S COMMITTEE<br>P.O. BOX 2008<br>MURFREESBORO, TN 37133 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 04/02/93 | $20.00 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $20.00 |
| TOTAL This Period (last page this line number only) | $20.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1).

0 5 3 3 4 3 0 5 4 4 4

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

| | |
|---|---|
| 1. NAME OF COMMITTEE (In full)<br>Americans (General Political Action Committee | |
| ADDRESS (number and street) ☐ Check if different than previously reported<br>2929 Allen Parkway | 2. FEC IDENTIFICATION NUMBER<br>C 00291666 |
| CITY, STATE and ZIP CODE<br>Houston, TX 77019 | 3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date) |

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☒ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

## SUMMARY

| | | COLUMN A<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|---|---|---|---|
| 5. | Covering Period 5/01/93 through 5/31/93 | | |
| 6. | (a) Cash on Hand January 1, 1993 | | $ 35,183.16 |
| | (b) Cash on Hand at Beginning of Reporting Period | $ 46,865.26 | |
| | (c) Total Receipts (from Line 19) | $ 7,225.60 | $ 37,388.63 |
| | (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 54,090.86 | $ 72,522.69 |
| 7. | Total Disbursements (from Line 30) | $ 8,520.00 | $ 26,951.83 |
| 8. | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 45,570.86 | $ 45,570.86 |
| 9. | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
June 11, 1993

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 1/1/91)

## SCHEDULE B — ITEMIZED DISBURSEMENTS

| Use separate schedule(s) for each category of the Detailed Summary Page | PAGE 1 OF 1 |
|---|---|
| | FOR LINE NUMBER 23 |

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
American General Political Action Committee C [illegible]

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>FRIENDS OF KENT CONRAD<br>236 MASSACHUSETTS AVE NE #202<br>WASHINGTON, DC 20002 | U.S. Senator<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 05/10/93 | $1,000.00 |
| B. Full Name, Mailing Address and ZIP Code<br>THE PRESIDENT'S DINNER<br>1101 17TH ST NW SUITE 606<br>WASHINGTON, DC 20036 | Multi-Candidate<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 05/10/93 | $1,000.00 |
| C. Full Name, Mailing Address and ZIP Code<br>** BART GORDON'S COMMITTEE<br>P.O. BOX 2008<br>MURFREESBORO, TN 37133 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 05/14/93 | $250.00 |
| D. Full Name, Mailing Address and ZIP Code<br>KAY FOR SENATE CAMPAIGN<br>2400 WEST LOOP SOUTH SUITE 106<br>HOUSTON, TX 77027 | U.S. Senator<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): Special Election – Runoff | 05/14/93 | $2,000.00 |
| E. Full Name, Mailing Address and ZIP Code<br>TEXANS FOR JOE BARTON<br>P.O. BOX 1444<br>ENNIS, TX 75120 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 05/18/93 | $1,000.00 |
| F. Full Name, Mailing Address and ZIP Code<br>HANCOCK FOR CONGRESS<br>P.O. BOX 40175<br>WASHINGTON, DC 20016 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 05/18/93 | $250.00 |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $4,520.00 |
| TOTAL This Period (last page this line number only) | $4,520.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(i).

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Quarterly Report)

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

| | |
|---|---|
| 1. NAME OF COMMITTEE (In full)<br>American General Political Action Committee | |
| ADDRESS (number and street) ☐ Check if different than previously reported<br>2929 Allen Parkway | 2. FEC IDENTIFICATION NUMBER<br>C [redacted] |
| CITY, STATE and ZIP CODE<br>Houston, TX 77019 | 3. ☐ This committee qualified as a multicandidate committee EFFECTIVE THIS Reporting Period on (date) |

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☒ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirty day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

| SUMMARY<br>Covering Period [redacted] through [redacted] | COLUMN A<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|---|---|---|
| (a) Cash on Hand January 1, 1993 | | $ [redacted] |
| (b) Cash on Hand at Beginning of Reporting Period | $ 46,570.86 | |
| (c) Total Receipts (from Line 19) | $ 7,203.70 | $ 44,889.26 |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 53,774.56 | $ 79,788.39 |
| 7. Total Disbursements (from Line 35) | $ 1,770.00 | $ 28,721.83 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 51,004.56 | $ 51,004.56 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120 |
| 10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
July 9, 1993

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

FEC FORM 3X
(revised 1/1/91)

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

| (Use separate schedule(s) for each category of the Detailed Summary Page) | PAGE 1 OF 1 |
|---|---|
| | FOR LINE NUMBER: 23 |

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Americans Elected Political Action Committee C 00350348

| | A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|---|
| | FRIENDS OF JIM BASSER<br>P.O. BOX 24723<br>NASHVILLE, TN 37202 | U.S. Senator<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 08/14/08 | $1,000.00 |
| ** | B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | BART GORDON'S COMMITTEE<br>P.O. BOX 2808<br>MURFREESBORO, TN 37133 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 08/15/08 | $500.00 |
| | C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| | D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): Special Election – Runoff | | |
| | E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| | F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| | G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| | H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| | I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $1,000.00 |
| TOTAL This Period (last page this line number only) | $1,000.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1).

29950348537300 2015 08

# REPORT OF RECEIPTS AND DISBURSEMENTS

**For Other Than An Authorized Committee**

(Summary Page)

| | |
|---|---|
| 1. NAME OF COMMITTEE (in full)<br>American General Political Action Committee | |
| ADDRESS (number and street) ☐ Check if different than previously reported<br>2929 Allen Parkway | 2. FEC IDENTIFICATION NUMBER<br>C 00264689 |
| CITY, STATE and ZIP CODE<br>Houston, TX 77019 | 3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date) |

## 4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☒ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

| SUMMARY<br>Covering Period 7/01/93 through 7/31/93 | COLUMN A<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|---|---|---|
| (a) Cash on Hand January 1, 1993 | | $ 25,199.18 |
| (b) Cash on Hand at Beginning of Reporting Period | $ 51,004.58 | |
| (c) Total Receipts (from Line 18) | $ 7,140.93 | $ 51,704.18 |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 58,145.51 | $ 88,887.34 |
| 7. Total Disbursements (from Line 30) | $ 220.00 | $ 28,941.83 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 57,925.51 | $ 57,925.51 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
Aug. 20, 1993

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 1/1/91)

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER: 22

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Americans Concerned Political Action Committee C 00201368

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>** BART GORDON'S COMMITTEE<br>P.O. BOX 2008<br>MURFREESBORO, TN 37133 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 07/13/83 | $20.00 |
| B. Full Name, Mailing Address and ZIP Code<br>COLEMAN FOR CONGRESS COMMITTEE<br>700 E. SAN ANTONIO, SUITE 723<br>EL PASO, TX 79901 | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | Date (month, day, year)<br>07/14/83 | Amount of Each Disbursement this Period<br>$200.00 |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| SUBTOTAL of Receipts This Page (optional) | | | $220.00 |
| TOTAL This Period (last page this line number only) | | | $220.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1).

9503368330

# REPORT OF RECEIPTS AND DISBURSEMENTS

**For Other Than An Authorized Committee**

**(Summary Page)**

| | |
|---|---|
| 1. NAME OF COMMITTEE (in full)<br>American General Political Action Committee | |
| ADDRESS (number and street)<br>2929 Allen Parkway ☐ Check if different than previously reported | 2. FEC IDENTIFICATION NUMBER<br>C 00094889 |
| CITY, STATE and ZIP CODE<br>Houston, TX 77019 | 3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date) |

## 4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☒ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

## SUMMARY

Covering Period 8/1/93 through 8/31/93

| | | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|---|
| (a) | Cash on Hand January 1, 1993 | | $ 35,163.16 |
| (b) | Cash on Hand at Beginning of Reporting Period | $ 57,925.51 | |
| (c) | Total Receipts (from Line 19) | $ 6,886.01 | $ 58,590.19 |
| (d) | Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 64,811.52 | $ 93,753.35 |
| 7. | Total Disbursements (from Line 36) | $ 1,020.00 | $ 29,961.83 |
| 8. | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 63,791.52 | $ 63,791.52 |
| 9. | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant) — Date
Robert L Brown — 9-20-93

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 1/1/91)

93503180719308

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER: 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American General Political Action Committee C 00261289

| | A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|---|
| ** | BART GORDON'S COMMITTEE<br>P.O. BOX 2068<br>MURFREESBORO, TN 37133 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 08/09/93 | $20.00 |
| | B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $20.00 |
| TOTAL This Period (last page this line number only) | $20.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1).

93038603843

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

| 1. NAME OF COMMITTEE (in full) | |
|---|---|
| American Personal Political Action Committee | |
| ADDRESS (number and street) 2929 Allen Parkway | ☐ Check if different than previously reported |
| CITY, STATE and ZIP CODE Houston, TX 77019 | 2. FEC IDENTIFICATION NUMBER C [illegible] |
| | 3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on (Date) |

## 4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☒ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

| SUMMARY<br>Covering Period [illegible] through [illegible] | COLUMN A<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|---|---|---|
| (a) Cash on Hand January 1, 1993 | | $ [illegible] |
| (b) Cash on Hand at Beginning of Reporting Period | $ 62,791.82 | |
| (c) Total Receipts (from Line 18) | $ 8,388.10 | $ 64,690.63 |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 70,180.62 | $ 100,182.45 |
| 7. Total Disbursements (from Line 30) | $ 1,520.00 | $ 31,481.83 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 68,670.62 | $ 68,670.62 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L. Brown

Date
10/20/93

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 1/1/91)

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

| Use separate schedule(s) for each category of the Detailed Summary Page | PAGE 1 OF 1 |
|---|---|
| | FOR LINE NUMBER 23 |

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
American General Political Action Committee C [illegible]

| | A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|---|
| ** | Bart Gordon's Committee<br>P. O. Box 2808<br>Murfreesboro, Tn 37133 | U. S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 08/12/96 | $20.00 |
| | B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $20.00 |
| TOTAL This Period (last page this line number only) | $20.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(i)

96031865011114

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

1. NAME OF COMMITTEE (In full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2929 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00094888

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date)

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☒ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

| SUMMARY | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| Covering Period 10/01/93 through 10/31/93 | | |
| 6 (a) Cash on Hand January 1, 1993 | | $ 25,163.16 |
| (b) Cash on Hand at Beginning of Reporting Period | $ 68,670.62 | |
| (c) Total Receipts (from Line 16) | $ 6,184.62 | $ 71,173.91 |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 74,855.24 | $ 108,337.07 |
| 7 Total Disbursements (from Line 30) | $ 23,270.00 | $ 54,751.83 |
| 8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 51,585.24 | $ 51,585.24 |
| 9 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
11-19-93

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 1/1/91)

# SCHEDULE B — ITEMIZED DISBURSEMENTS

| Use separate schedule(s) for each category of the Detailed Summary Page | PAGE 1 OF 1 |
|---|---|
| | FOR LINE NUMBER 23 |

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
American General Political Action Committee C 00202663

| | A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|---|
| ** | Earl Gordon's Committee<br>P. O. Box 2006<br>Murfreesboro, TN 37133 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 10/06/93 | $20.00 |
| | B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | SENATOR CHARLES S. ROSS CAMPAIGN<br>P. O. BOX 188<br>HOUSTON, TX 77001-0188 | U.S. Senator<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 10/06/93 | $1,000.00 |
| | C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | GENE GREEN CONGRESSIONAL CAMPAIGN<br>P. O. BOX 18128<br>HOUSTON, TX 77222 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 10/06/93 | $500.00 |
| | D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | LIFE PAC<br>1001 PENNSYLVANIA AVE. N. W.<br>WASHINGTON, DC 20004-2599 | Federal Multi-Candidate<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 10/11/93 | $5,000.00 |
| | E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | DAVID DURENBERGER LEGAL EXPENSE TRUST FU<br>P. O. BOX 105<br>WAYZATA, MN 55391 | U.S. Senator<br>Disbursement for: ☐ Primary ☐ General ☒ Other (specify): Legal defense fund | 10/11/93 | $600.00 |
| | F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | RE-ELECT DON SUNDQUIST<br>1200 EYE ST. N. W., SUITE 570<br>WASHINGTON, DC 20005 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 10/11/93 | $1,000.00 |
| | G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | QUILLEN FOR CONGRESS COMMITTEE<br>P. O. BOX 2789<br>WASHINGTON, DC 20013 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 10/11/93 | $500.00 |
| | H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | THE CONGRESSMAN BOB CLEMENT COMMITTEE<br>P. O. BOX 150606<br>NASHVILLE, TN 37215 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 10/11/93 | $500.00 |
| | I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | KAY BAILEY HUTCHISON FOR SENATE COMMITTEE<br>800 BRAZOS SUITE 1200<br>AUSTIN, TX 78701 | U.S. Senator<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 10/21/93 | $5,000.00 |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $14,020.00 |
| TOTAL This Period (last page this line number only) | $14,020.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1)

8930702328

# REPORT OF RECEIPTS AND DISBURSEMENTS

**For Other Than An Authorized Committee**

(Summary Page)

DEC 20 2 39 PM '93

| | |
|---|---|
| 1. NAME OF COMMITTEE (in full)<br>American General Political Action Committee | |
| ADDRESS (number and street)<br>2929 Allen Parkway<br>☐ Check if different than previously reported | 2. FEC IDENTIFICATION NUMBER<br>C 00084269 |
| CITY, STATE and ZIP CODE<br>Houston, TX 77019 | 3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date) _____ |

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☒ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

## SUMMARY

| | | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|---|
| 5. | Covering Period 11/01/93 through 11/30/93 | | |
| 6. (a) | Cash on Hand January 1, 1993 | | $ 35,163.18 |
| (b) | Cash on Hand at Beginning of Reporting Period | $ 51,585.24 | |
| (c) | Total Receipts (from Line 19) | $ 5,832.70 | $ 77,006.61 |
| (d) | Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 57,417.94 | $ 112,169.77 |
| 7. | Total Disbursements (from Line 30) | $ 2,520.00 | $ 57,271.83 |
| 8. | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 54,897.94 | $ 54,897.94 |
| 9. | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10 | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
Dec. 17, 1993

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 1/1/91)

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)

American General Political Action Committee C 00221283

| | A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|---|
| | John Ashcroft for U S Senate Committee<br>517 Second Street N. E.<br>Washington, DC 20013 | U.S. Senator<br>Disbursement for: [X] Primary [ ] General [ ] Other (specify): | 11/11/93 | $1,000.00 |
| ** | B. Full Name, Mailing Address and ZIP Code<br>Bart Gordon's Committee<br>P. O. Box 2008<br>Murfreesboro, TN 37133 | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 11/19/93 | $20.00 |
| | C. Full Name, Mailing Address and ZIP Code<br>Fields for Congress<br>P. O. Box 2408<br>Humble, TX 77347-9943 | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: [X] Primary [ ] General [ ] Other (specify): | 11/29/93 | $1,000.00 |
| | D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| | I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $2,020.00 |
| TOTAL This Period (last page this line number only) | $2,020.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS SEE SCHEDULE A FOR LINE 11(a)(1)

# REPORT OF RECEIPTS AND DISBURSEMENTS

**For Other Than An Authorized Committee**

(Summary Page)

| | |
|---|---|
| 1. NAME OF COMMITTEE (in full)<br>American General Political Action Committee | |
| ADDRESS (number and street) ☐ Check if different than previously reported<br>2929 Allen Parkway | 2. FEC IDENTIFICATION NUMBER<br>C 00084269 |
| CITY, STATE and ZIP CODE<br>Houston, TX 77019 | 3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date) |

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☒ NO

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☒ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

## SUMMARY

| | | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|---|
| 5. Covering Period 12/01/93 through 12/31/93 | | | |
| 6. (a) | Cash on Hand January 1, 1993 | | $ 35,163.16 |
| (b) | Cash on Hand at Beginning of Reporting Period | $ 54,897.94 | |
| (c) | Total Receipts (from Line 19) | $ 5,819.89 | $ 82,826.50 |
| (d) | Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 60,717.83 | $ 117,989.66 |
| 7. | Total Disbursements (from Line 30) | $ 20.00 | $ 57,291.83 |
| 8. | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 60,697.83 | $ 60,697.83 |
| 9. | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
Jan 19, 1994

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

**SCHEDULE B** — **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)

American General Political Action Committee C 00231209

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| ** Bart Gordon Committee<br>P. O. Box 2008<br>Murfreesboro,, TN 37133 | U.S Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/15/93 | $20.00 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| SUBTOTAL of Receipts This Page (optional) | | | $20.00 |
| TOTAL This Period (last page this line number only) | | | $20.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS SEE SCHEDULE A FOR LINE 11(a)(i)

9945031837402166070

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION

[redacted]

SPT. OILS GROUP [redacted]
Houston, TX 77019

4. TYPE OF REPORT

4a ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year-End Report

☒ July 31 Mid-Year Report (Non-election Year Only)

☐ Termination Report

4b Is this Report an Amendment? ☐ YES ☒ NO

Monthly Report Due On:

| | | |
|---|---|---|
| ☒ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 30 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelve day report preceding _____ (Type of Election) (Election on _____) in the State of _____

☐ Thirty day report following the General Election on _____ in the State of _____

0 5 0 4 3 7 0 1 0 0 1 0 4

| 5 SUMMARY Covering Period [redacted] through [redacted] | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| 6a Cash on Hand January 1, 1994 | | $ [redacted] |
| 6b Cash on Hand at Beginning of Reporting Period | $ 90,027.03 | |
| 6c Total Receipts (from Line 19) | $ 5,755.00 | $ 5,755.00 |
| 6d Subtotal (add Lines 6b and 6c) for Column A total Lines 6b and 6c for Column B | $ 95,482.03 | $ [redacted] |
| 7 Total Disbursements (from Line 28) | $ 5,000.00 | $ 5,000.00 |
| 8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6d) | $ (90,482.03) | $ (90,482.03) |
| 9 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | For further information contact: (Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120) |
| 10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
Feb. 18, 1994

NOTE: Willful falsification of facts, or omission of incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

FEC FORM 3X
(revised 5/93)

| | | | |
|---|---|---|---|
| [illegible] | Purpose of Disbursement<br>U.S. Senate<br>Disbursement for: [X] Primary [ ] General<br>[ ] Other (specify): | Date (month, day, year)<br>01/12/94 | Amount of Each Disbursement this Period<br>$500.00 |
| [illegible] | Purpose of Disbursement<br>U.S. Senate<br>Disbursement for: [X] Primary [ ] General<br>[ ] Other (specify): | Date (month, day, year)<br>01/12/94 | Amount of Each Disbursement this Period<br>$1,000.00 |
| [illegible] | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: [X] Primary [ ] General<br>[ ] Other (specify): | Date (month, day, year)<br>01/12/94 | Amount of Each Disbursement this Period<br>$500.00 |
| [illegible] | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: [ ] Primary [X] General<br>[ ] Other (specify): | Date (month, day, year)<br>01/17/94 | Amount of Each Disbursement this Period<br>$50.00 |
| [illegible] | Purpose of Disbursement<br>U.S. Senator<br>Disbursement for: [X] Primary [ ] General<br>[ ] Other (specify): | Date (month, day, year)<br>01/12/94 | Amount of Each Disbursement this Period<br>$1,000.00 |
| [illegible] | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: [X] Primary [ ] General<br>[ ] Other (specify): | Date (month, day, year)<br>01/17/94 | Amount of Each Disbursement this Period<br>$500.00 |
| [illegible] | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General<br>[ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| [illegible] | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General<br>[ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| 11. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General<br>[ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| SUBTOTAL of Receipts This Page (optional) | | | $3,500.00 |
| TOTAL This Period (last page this line number only) | | | $3,500.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1)

94038051103

# REPORT OF RECEIPTS AND DISBURSEMENTS

**For Other Than An Authorized Committee**

**(Summary Page)**

Mar 23 11 [illegible] '94

1. NAME OF COMMITTEE (in full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2968 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00084889

3. [X] This committee qualified as a multicandidate committee DURING THIS Reporting Period prior to January 1, 1994 (date).

## 4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| [X] March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES [X] NO

| | SUMMARY | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|---|
| | Covering Period 01/01/94 through 03/17/94 | | |
| 6. | (a) Cash on Hand January 1, 1994 | | $ 60,697.83 |
| | (b) Cash on Hand at Beginning of Reporting Period | $ 60,432.86 | |
| | (c) Total Receipts (from Line 19) | $ 5,738.95 | $ 11,493.98 |
| | (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 66,171.81 | $ 72,191.81 |
| 7. | Total Disbursements (from Line 30) | $ 19,270.00 | $ 25,290.00 |
| 8. | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 46,901.81 | $ 46,901.81 |
| 9. | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10 | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
March 17, 1994

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 8/93)

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

| Use separate schedule(s) for each category of the Detailed Summary Page | PAGE 1 OF 1 |
|---|---|
| | FOR LINE NUMBER 23 |

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
American General Political Action Committee C 00003368

| | | | |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Campaign America FEC# C-00003368<br>[illegible] Second Street N. E.<br>Washington, DC 20002 | Purpose of Disbursement<br>U. S. Senate Multi-Candidate<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | Date (month, day, year)<br>02/03/94 | Amount of Each Disbursement this Period<br>$3,000.00 |
| F. Full Name, Mailing Address and ZIP Code<br>** Earl Gordon's Committee<br>P. O. Box 2008<br>Murfreesboro, TN 37133 | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | Date (month, day, year)<br>02/08/94 | Amount of Each Disbursement this Period<br>$20.00 |
| G. Full Name, Mailing Address and ZIP Code<br>Friends of Phil Gramm<br>6750 West Loop South, Ste. 850<br>Houston, TX 77401 | Purpose of Disbursement<br>U.S. Senator<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | Date (month, day, year)<br>02/03/94 | Amount of Each Disbursement this Period<br>$5,000.00 |
| H. Full Name, Mailing Address and ZIP Code<br>Gene Green Congressional Campaign<br>P. O. Box 2004<br>Washington, DC 20013 | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | Date (month, day, year)<br>02/03/94 | Amount of Each Disbursement this Period<br>$500.00 |
| I. Full Name, Mailing Address and ZIP Code<br>Sheila Jackson Lee for Congress<br>P. O. Box 1199<br>Houston, TX 77251 | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | Date (month, day, year)<br>02/03/94 | Amount of Each Disbursement this Period<br>$1,000.00 |
| J. Full Name, Mailing Address and ZIP Code<br>Friends of Jim Sasser<br>P. O. Box 24723<br>Nashville, TN 37202 | Purpose of Disbursement<br>U.S. Senator<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | Date (month, day, year)<br>02/15/94 | Amount of Each Disbursement this Period<br>$1,000.00 |
| G. Full Name, Mailing Address and ZIP Code<br>Republican Senatorial Inner Circle<br>Nat'l Republican Senatorial Comm. FEC#C-00027466<br>425 Second Street N. E.<br>Washington, DC 20002 | Purpose of Disbursement<br>U. S. Senate Multi-Candidate<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | Date (month, day, year)<br>02/03/94 | Amount of Each Disbursement this Period<br>$1,000.00 |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $12,020.00 |
| TOTAL This Period (last page this line number only) | $12,020.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1)

95040338710314004947

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

1. NAME OF COMMITTEE (In full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2929 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00024869

3. [X] This committee qualified as a multicandidate committee DURING THIS Reporting Period prior to January 1, 1994 (Mid-Y).

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| [X] April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES [X] NO

| SUMMARY | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| Covering Period 03/01/94 through 03/31/94 | | |
| 6(a) Cash on Hand January 1, 1994 | | $ 60,697.83 |
| 6(b) Cash on Hand at Beginning of Reporting Period | $ 46,901.81 | |
| 6(c) Total Receipts (from Line 19) | $ 5,735.29 | $ 17,229.27 |
| 6(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 52,637.10 | $ 77,927.10 |
| 7. Total Disbursements (from Line 30) | $ 9,497.00 | $ 34,787.00 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 43,140.10 | $ 43,140.10 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L. Brown

Date
April 6, 1994

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

## SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 22

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Americans Opposed Political Action Committee C [illegible]

| | | | |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Jeb Bush for Governor<br>1309 E. Tennessee St. Ste. C4<br>Tallahassee, FL 32308 | Purpose of Disbursement<br>State Wide<br>Disbursement for: [X] Primary [ ] General [ ] Other (specify): | Date (month, day, year)<br>03/02/94 | Amount of Each Disbursement this Period<br>$600.00 |
| G. Full Name, Mailing Address and ZIP Code<br>Wallace Campaign<br>P. O. Box 986<br>Montgomery, AL 36101 | Purpose of Disbursement<br>State Wide<br>Disbursement for: [X] Primary [ ] General [ ] Other (specify): | Date (month, day, year)<br>03/03/94 | Amount of Each Disbursement this Period<br>$1,500.00 |
| H. Full Name, Mailing Address and ZIP Code<br>Bank Texas<br>P. O. Box 660369<br>Houston, TX 77266-0369 | Purpose of Disbursement<br>1993 Federal Income Tax Payment<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year)<br>03/08/94 | Amount of Each Disbursement this Period<br>$227.00 |
| D. Full Name, Mailing Address and ZIP Code<br>George W. Bush for Governor<br>P. O. Box 2136<br>Austin, TX 78768-2136 | Purpose of Disbursement<br>State Wide<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | Date (month, day, year)<br>03/11/94 | Amount of Each Disbursement this Period<br>$6,000.00 |
| G. Full Name, Mailing Address and ZIP Code<br>David Hatman for State Treasurer<br>1717 W. 6th St. Suite 262<br>Austin, TX 78703 | Purpose of Disbursement<br>State Wide<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | Date (month, day, year)<br>03/11/94 | Amount of Each Disbursement this Period<br>$500.00 |
| H. Full Name, Mailing Address and ZIP Code<br>Steve Crawford Campaign<br>3303 Richmond Ste. C<br>Houston, TX 77098 | Purpose of Disbursement<br>State Representative<br>Disbursement for: [X] Primary [ ] General [ ] Other (specify): | Date (month, day, year)<br>03/28/94 | Amount of Each Disbursement this Period<br>$250.00 |
| G. Full Name, Mailing Address and ZIP Code<br>The Committee to Keep Justice Gonzalez<br>P. O. Box 684279<br>Austin, TX 78768-4279 | Purpose of Disbursement<br>State Wide<br>Disbursement for: [X] Primary [ ] General [ ] Other (specify): | Date (month, day, year)<br>03/28/94 | Amount of Each Disbursement this Period<br>$1,500.00 |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $9,477.00 |
| TOTAL This Period (last page this line number only) | $9,477.00 |

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

1. NAME OF COMMITTEE (in full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2929 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00284269

3. [X] This committee qualified as a multicandidate committee DURING THIS Reporting Period prior to January 1, 1994 (date).

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| [X] May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES [X] NO

| SUMMARY | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| Covering Period 04/01/94 through 04/30/94 | | |
| 6(a) Cash on Hand January 1, 1994 | | $ 60,697.83 |
| 6(b) Cash on Hand at Beginning of Reporting Period | $ 43,140.10 | |
| 6(c) Total Receipts (from Line 19) | $ 5,731.27 | $ 22,980.54 |
| 6(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 48,871.37 | $ 83,658.37 |
| 7. Total Disbursements (from Line 30) | $ 1,020.00 | $ 35,807.00 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 47,851.37 | $ 47,851.37 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
May 11, 1994

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

(Use separate schedule(s) for each category of the Detailed Summary Page)

PAGE 1 OF 1

FOR LINE NUMBER: 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American General Political Action Committee C 00061358

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>** Bat Gordon's Committee<br>P.O. Box 2068<br>Murfreesboro, TN 3713 | U.S. Representative<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 04/07/94 | $20.00 |
| B. Full Name, Mailing Address and ZIP Code<br>Ashcroft for Senate<br>517 Second St., NE<br>Washington, DC 20002 | U.S. Senator<br>Disbursement for: [X] Primary [ ] General [ ] Other (specify): | 04/12/94 | $1,000.00 |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| SUBTOTAL of Receipts This Page (optional) | | | $1,020.00 |
| TOTAL This Period (last page this line number only) | | | $1,020.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1)

24139741723

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE

1. NAME OF COMMITTEE (in full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2929 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00094299 Jun 21 11 45 AM '94

3. [X] This committee qualified as a multicandidate committee DURING THIS Reporting Period prior to January 1, 1994 (Initial)

## 4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | [X] June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES [X] NO

| SUMMARY<br>Covering Period 05/01/94 through 05/31/94 | COLUMN A<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|---|---|---|
| 6(a) Cash on Hand January 1, 1994 | | $ 60,697.83 |
| 6(b) Cash on Hand at Beginning of Reporting Period | $ 47,851.37 | |
| 6(c) Total Receipts (from Line 19) | $ 5,617.93 | $ 28,578.47 |
| 6(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 53,469.30 | $ 89,276.30 |
| 7. Total Disbursements (from Line 30) | $ 10,020.00 | $ 45,827.00 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 43,449.30 | $ 43,449.30 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | For further information contact<br>Federal Election Commission<br>999 E Street, NW<br>Washington, DC 20463<br>Toll Free 800-424-9530<br>Local 202-376-3120 |
| 10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L. Brown

Date
June 16, 1994

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

[redacted]

| | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| 6a Cash on Hand January 1, 19[redacted] | [redacted] | $ [redacted] |
| 6b Cash on Hand at Beginning of Reporting Period | $ 25,129.01 | [redacted] |
| 7 Total Receipts (from Line 16) | $ 9,470.01 | $ 49,129.00 |
| 8 Subtotal (add Lines 6(b) and 7(b) for Column A and Line 6(a) and 7(b) for Column B) | $ 40,599.02 | $ 103,691.02 |
| 9 Total Disbursements (from Line 28) | $ 8,500.00 | $ 74,637.00 |
| 10 Cash on Hand at Close of Reporting Period (subtract Line 9 from Line 8) | $ 32,099.02 | $ 29,054.02 |
| 11a Debts and Obligations Owed TO the Committee (Itemize on Schedule C and/or Schedule D) | $ | For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120 |
| 11b Debts and Obligations Owed BY the Committee (Itemize on Schedule C and/or Schedule D) | $ | |

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer (Authorized)
Robert L. Brown

Signature of Treasurer (Authorized)
Robert L. Brown

Date
Sept. 14, 1994

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 6/93)

22044370012120

| | | | |
|---|---|---|---|
| [illegible] | [illegible] U.S. [illegible] Disbursement for: [ ] Primary [X] General [ ] Other (specify) | Date (month, day, year) 08/10/94 | Amount of Each Disbursement this Period [illegible] |
| B. Full Name, Mailing Address and ZIP Code [illegible] P. O. Box [illegible] [illegible], TN 37138 | Purpose of Disbursement U.S. Representative Disbursement for: [ ] Primary [X] General [ ] Other (specify) | Date (month, day, year) 08/10/94 | Amount of Each Disbursement this Period $250.00 |
| C. Full Name, Mailing Address and ZIP Code Friends of John Tanner P. O. Box 1002 Union City, TN 38261 | Purpose of Disbursement U.S. Representative Disbursement for: [ ] Primary [X] General [ ] Other (specify) | Date (month, day, year) 08/10/94 | Amount of Each Disbursement this Period $250.00 |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| SUBTOTAL of Receipts This Page (optional) | | | $1,000.00 |
| TOTAL This Period (last page this line number only) | | | $1,000.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS SEE SCHEDULE A FOR LINE 11(a)(1)

950343701011

[redacted]

[redacted]

6b ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 1992 Year Report (Non-election Year Only)

☐ Termination Report

☐ January 31 ☐ February 20 ☐ March 20 ☐ April 20 ☐ May 20 ☐ June 20 ☐ July 20 ☒ August 20 ☐ September 20 ☐ October 20 ☐ November 22 ☐ December 20

☐ Twelve day report preceding _____ (type of election) election on _____ in the State of _____

☐ Thirty day report following the General Election on _____ in the State of _____

6c Is this Report an Amendment? ☐ Yes ☒ No

| SUMMARY Covering Period _____ through _____ | COLUMN A This Period | COLUMN B Calendar Year -to- Date |
|---|---|---|
| 7 Cash on Hand January 1, 1994 | [redacted] | [redacted] |
| 8 Cash on Hand at Beginning of Reporting Period | $ 44,742.39 | [redacted] |
| 9 Total Receipts (from Line 19) | $ 4,352.42 | $ 39,709.00 |
| 10 Subtotal (add Lines 4(b) and 4(c) for Column A and Lines 5(b) and 5(c) for Column B) | $ 49,094.81 | $ 100,491.00 |
| 11 Total Disbursements (from Line 35) | $ 14,970.00 | $ 66,317.00 |
| 12 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(b)) | $ 34,124.81 | $ 34,124.81 |
| 13 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 14 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact: Federal Election Commission [redacted] Washington, DC 20463 Toll Free 800-424-[redacted] Local 202 - 376 - 3120

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L. Brown

Date
Aug. 19, 1994

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

FEC FORM 3X
revised 6/93

C 00349391 P9 0 0 4 2 2

| | | | |
|---|---|---|---|
| | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General | Date (month, day, year) | Amount of Each Disbursement this Period |
| [redacted] | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☒ General | Date (month, day, year)<br>9/30/04 | Amount of Each Disbursement this Period<br>[redacted] |
| [redacted] | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General | Date (month, day, year)<br>9/30/04 | Amount of Each Disbursement this Period<br>[redacted] |
| [redacted] | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General | Date (month, day, year) | Amount of Each Disbursement this Period |
| [redacted] | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General | Date (month, day, year) | Amount of Each Disbursement this Period |
| [redacted] | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General | Date (month, day, year) | Amount of Each Disbursement this Period |
| [redacted] | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General | Date (month, day, year) | Amount of Each Disbursement this Period |
| [redacted] | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General | Date (month, day, year) | Amount of Each Disbursement this Period |
| [redacted] | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General | Date (month, day, year) | Amount of Each Disbursement this Period |
| SUBTOTAL of Receipts This Page (optional) | | | $5,270.00 |
| TOTAL This Period (last page this line number only) | | | $5,270.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1)

26043790893

[redacted]

[redacted]

[redacted]

| | | | |
|---|---|---|---|
| [illegible] | [illegible] | [illegible] | [illegible] |
| [illegible] | [illegible] | [illegible] | [illegible] |
| [illegible] | [illegible] | [illegible] | [illegible] |
| [illegible] | [illegible] | [illegible] | [illegible] |
| [illegible] | [illegible] | [illegible] | [illegible] |
| [illegible] | [illegible] | [illegible] | [illegible] |
| [illegible] | [illegible] | [illegible] | [illegible] |
| [illegible] | [illegible] | [illegible] | [illegible] |
| [illegible] | [illegible] | [illegible] | [illegible] |
| SUBTOTAL of Receipts This Page (optional) | | | |
| TOTAL This Period (last page this line number only) | | | |

* EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALDERA WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE GENERAL A FORMAT 9403

9403940396959

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

1. NAME OF COMMITTEE (in full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2929 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00094268

3. [X] This committee qualified as a multicandidate committee DURING THIS Reporting Period prior to January 1, 1994 (date).

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | [X] July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES [X] NO

| | SUMMARY | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|---|
| 5 | Covering Period 5/21/94 through 6/20/94 | | |
| 6 | (a) Cash on Hand January 1, 1994 | | $ 80,697.83 |
| | (b) Cash on Hand at Beginning of Reporting Period | $ 43,449.30 | |
| 7 | (c) Total Receipts (from Line 19) | $ 6,813.09 | $ 35,391.56 |
| 8 | (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 50,262.39 | $ 96,089.39 |
| 7 | Total Disbursements (from Line 30) | $ 5,520.00 | $ 51,347.00 |
| 8 | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 44,742.39 | $ 44,742.39 |
| 9 | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10 | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
June 20, 1994

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 22

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American General Political Action Committee C 00253302

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| ** Bart Gordon's Committee<br>P.O. Box 2006<br>Murfreesboro, TN 37133 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 08/15/94 | $20.00 |
| B. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| Haytaian – U.S. Senate '94<br>2589 Nottingham Way<br>Hamilton Township, NJ 08619 | U.S. Senator<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 08/16/94 | $500.00 |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| John Ashcroft for Senate<br>517 2nd Street, NE<br>Washington, DC 20002 | U.S. Senator<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | 08/23/94 | $1,000.00 |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| Friends of Jim Sasser<br>P.O. Box 24723<br>Nashville, TN 37202 | U.S. Senator<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 08/23/94 | $1,000.00 |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| Friends of Kent Conrad<br>112-B E. Broad Street<br>Falls Church, VA 22046 | U.S. Senator<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 08/29/94 | $1,000.00 |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $3,520.00 |
| TOTAL This Period (last page this line number only) | $3,520.00 |

** EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1)

9 4 0 3 1 8 1 4 5 7

# REPORT OF RECEIPTS AND DISBURSEMENTS

**For Other Than An Authorized Committee**

**(Summary Page)**

FEDERAL ELECTION COMMISSION
MAIL ROOM
'94 OCT 21 1 13 PM

1. NAME OF COMMITTEE (in full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2929 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00094839

3. [X] This committee qualified as a multicandidate committee during the 1994 Reporting Period prior to January 1, 1994 (check).

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:
☐ February 20 ☐ June 20 [X] October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES [X] NO

## SUMMARY

| | | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|---|
| 5. | Covering Period 09/01/94 through 09/30/94 | | |
| 6. | (a) Cash on Hand January 1, 1994 | | $ 60,697.83 |
| | (b) Cash on Hand at Beginning of Reporting Period | $ 32,024.42 | |
| | (c) Total Receipts (from Line 19) | $ 6,465.77 | $ 52,629.36 |
| | (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 38,490.19 | $ 113,327.19 |
| 7. | Total Disbursements (from Line 30) | $ 25,470.00 | $ 100,307.00 |
| 8. | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 13,020.19 | $ 13,020.19 |
| 9. | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10. | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
10/20/94

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

## SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

American General Political Action Committee C 00021209

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| Mike Dewine for U. S. Senate<br>Eight East Broad St. Floor 15<br>Columbus, OH 43215 | U.S. Senator<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 09/01/94 | $1,000.00 |
| **B. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| Friends of Craig Thomas<br>P O Box 1580<br>Casper, WY 82601 | U.S. Senator<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 09/01/94 | $1,000.00 |
| **C. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| Christensen for Congress<br>P O Box 540821<br>Omaha, NE 68154 | U.S. Representative<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 09/01/94 | $1,000.00 |
| **D. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| Texans for Henry Bonilla<br>P O Box 17292<br>San Antonio, TX 78217 | U.S. Representative<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 09/01/94 | $500.00 |
| **E. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| New Jersey Republican State Committee<br>28 W. State St., Suite 305<br>Trenton, NJ 08608 | Federal Multi-candidate<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 09/01/94 | $2,000.00 |
| **F. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| Fred Thompson for U. S. Senate<br>1808 W. End Ave #901<br>Nashville, TN 37203 | U.S. Senator<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 09/09/94 | $1,500.00 |
| **G. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| Congressman Bob Clement Committee<br>P O Box 150608<br>Nashville, TN 37215 | U.S. Representative<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 09/16/94 | $1,000.00 |
| **H. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| Committee for Sam Gibbons<br>P O Box 2884<br>Washington, DC 20013 | U.S. Representative<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 09/16/94 | $1,000.00 |
| **I. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| Bart Gordon's Committee<br>P O Box 2008<br>Murfreesboro, TN 37133 | U.S. Representative<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify): | 09/19/94 | $20.00 |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $9,020.00 |
| TOTAL This Period (last page this line number only) | $9,020.00 |

* EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(i)

# REPORT OF RECEIPTS AND DISBURSEMENTS

**For Other Than An Authorized Committee**

**(Summary Page)**

1. NAME OF COMMITTEE (In full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2929 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00024299

3. [X] This committee qualified as a multicandidate committee DURING THIS Reporting Period prior to January 1, 1994 (date).

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non – election Year Only)
☐ Termination Report

Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

[X] Thirtieth day report following the General Election on November 8, 1994 in the State of Texas

(b) Is this Report an Amendment? ☐ YES [X] NO

## SUMMARY

5 Covering Period 10/20/94 through: 11/28/94

| | | COLUMN A This Period | COLUMN B Calendar Year – to – Date |
|---|---|---|---|
| 6 | (a) Cash on Hand January 1, 1994 | | $ 80,697.83 |
| | (b) Cash on Hand at Beginning of Reporting Period | $ 12,112.33 | |
| | (c) Total Receipts (from Line 18) | $ 6,065.87 | $ 84,607.37 |
| | (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 18,178.20 | $ 125,305.20 |
| 7 | Total Disbursements (from Line 30) | $ 2,520.00 | $ 109,647.00 |
| 8 | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 15,658.20 | $ 15,658.20 |
| 9 | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10 | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800 – 424 – 9530
Local 202 – 376 – 3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
12/8/94

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

# SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)

American General Political Action Committee — C 00284299

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>The Wilson Committee<br>4804 Deming Avenue<br>Alexandria, VA 22312 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 10/20/94 | $1,000.00 |
| B. Full Name, Mailing Address and ZIP Code<br>* Bart Gordon's Committee<br>P.O. Box 2008<br>Murfreesboro, TN 37133 | Purpose of Disbursement<br>U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 11/21/94 | $20.00 |
| C. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| D. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement this Period |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $1,020.00 |
| TOTAL This Period (last page this line number only) | $1,020.00 |

* EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1)

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

1. NAME OF COMMITTEE (In Full)
American General Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
2929 Allen Parkway

CITY, STATE and ZIP CODE
Houston, TX 77019

2. FEC IDENTIFICATION NUMBER
C 00094359

3. [X] This committee qualified as a multicandidate committee DURING THIS Reporting Period prior to January 1, 1994 (date).

## 4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | [X] January 31 |

- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES [X] NO

## SUMMARY

Covering Period 11/[illegible]/94 through 12/31/94

| | | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|---|
| 6 | (a) Cash on Hand January 1, 1994 | | $ [illegible] |
| | (b) Cash on Hand at Beginning of Reporting Period | $ 15,658.20 | |
| | (c) Total Receipts (from Line 19) | $ 6,071.99 | $ 70,679.36 |
| | (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 21,730.19 | $ 131,377.19 |
| 7 | Total Disbursements (from Line 30) | $ 2,301.45 | $ 111,948.45 |
| 8 | Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 19,428.74 | $ 19,428.74 |
| 9 | Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |
| 10 | Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ | |

For further information contact
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

*I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.*

Type or Print Name of Treasurer (Assistant)
Robert L. Brown

Signature of Treasurer (Assistant)
Robert L Brown

Date
Jan. 28, 1995

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

Report(s) schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)

American Seniors Political Action Committee C [illegible]

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| Congressman Joe Barton Committee<br>P. O. Box 1444<br>Ennis, TX 75120 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/08/94 | $500.00 |
| **B. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| Bart Gordon's Committee<br>P. O. Box 2008<br>Murfreesboro, TN 37133 | U.S. Representative<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify): | 12/13/94 | $20.00 |
| **C. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| **D. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| **E. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| **F. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| **G. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| **H. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |
| **I. Full Name, Mailing Address and ZIP Code** | **Purpose of Disbursement** | **Date (month, day, year)** | **Amount of Each Disbursement this Period** |
| | Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | | |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $520.00 |
| TOTAL This Period (last page this line number only) | $520.00 |

* EARMARKED CONTRIBUTIONS MADE VIA PAYROLL DEDUCTION BY E. RON CALAHAN WHICH WERE FORWARDED TO CANDIDATE'S COMMITTEE IN ACCORDANCE WITH FEC REGULATIONS. SEE SCHEDULE A FOR LINE 11(a)(1)

9504370124

# EXHIBIT 2

## 1993-1994 PAC
## Contributions Received
## by Congressman Frank Pallone, Jr.

FEDERAL ELECTION COMMISSION
1993-1994
[redacted]IDATE INDEX OF SUPPORTING DOCUMENTS - (E[redacted])

DATE 18MAY95
PAGE 1

| CANDIDATE/COMMITTEE/DOCUMENT | OFFICE SOUGHT/ | PARTY | RECEIPTS PRIMARY | RECEIPTS GENERAL | DISBURSEMENTS PRIMARY | DISBURSEMENTS GENERAL | COVERAGE DATES | # OF PAGES | MICROFILM LOCATION |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | TYPE OF FILER | | |
| PALLONE, FRANK JR | HOUSE 06 | DEMOCRATIC PARTY | | | | NEW JERSEY | 1994 ELECTION | ID# | H8NJ03073 |
| 1. STATEMENT OF CANDIDATE | | | | | | | | | |
| 1993 STATEMENT OF CANDIDATE | | | | | | | 25JAN93 | 1 | 93HSE/491/0543 |
| 2. PRINCIPAL CAMPAIGN COMMITTEE | | | | | | | | | |
| PALLONE FOR CONGRESS | | | | | | | ID #C00226928 HOUSE | | |
| 1993 STATEMENT OF ORGANIZATION - AMENDMENT | | | | | | | 25JAN93 | 1 | 93HSE/491/0542 |
| MID-YEAR REPORT | | | 61.380 | | 61.504 | | 1JAN93 -30JUN93 | 60 | 93HSE/499/0503 |
| MID-YEAR REPORT - AMENDMENT | | | - | | - | | 1JAN93 -30JUN93 | 3 | 93HSE/504/0073 |
| YEAR-END | | | 85.902 | | 53.860 | | 1JUL93 -31DEC93 | 89 | 94HSE/507/2168 |
| YEAR-END - AMENDMENT | | | - | | - | | 1JUL93 -31DEC93 | 21 | 94HSE/522/2337 |
| REQUEST FOR ADDITIONAL INFORMATION | | | | | | | 1JUL93 -31DEC93 | 2 | 94FEC/897/3578 |
| 1994 48 HOUR CONTRIBUTION NOTICE | | | | | | | 26MAY94 | 1 | 94HSE/523/2043 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 27MAY94 | 1 | 94HSE/523/3479 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 1JUN94 | 1 | 94HSE/524/0315 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 3JUN94 | 1 | 94HSE/524/1447 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 21OCT94 | 1 | 94HSE/549/3779 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 26OCT94 | 1 | 94HSE/551/1539 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 28OCT94 | 2 | 94HSE/555/0779 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 1NOV94 | 2 | 94HSE/555/5089 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 3NOV94 | 1 | 94HSE/556/1703 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 4NOV94 | 1 | 94HSE/556/2619 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 7NOV94 | 1 | 94HSE/556/3074 |
| APRIL QUARTERLY | | | 36.249 | | 41.613 | | 1JAN94 -31MAR94 | 30 | 94HSE/520/0689 |
| PRE-PRIMARY | | | 25.960 | | 27.313 | | 1APR94 -18MAY94 | 85 | 94HSE/523/0579 |
| PRE-PRIMARY - AMENDMENT | | | - | | - | | 1APR94 -18MAY94 | 2 | 94HSE/525/0463 |
| REQUEST FOR ADDITIONAL INFORMATION | | | | | | | 1APR94 -18MAY94 | 3 | 94FEC/902/3140 |
| JULY QUARTERLY | | | | 76.663 | | 23.372 | 19MAY94 -30JUN94 | 88 | 94HSE/529/4102 |
| JULY QUARTERLY - AMENDMENT | | | | - | | - | 19MAY94 -30JUN94 | 2 | 94HSE/535/3609 |
| OCTOBER QUARTERLY | | | | 225.666 | | 90.007 | 1JUL94 -30SEP94 | 136 | 94HSE/542/4715 |
| OCTOBER QUARTERLY - AMENDMENT | | | | - | | - | 1JUL94 -30SEP94 | 3 | 94HSE/551/3043 |
| OCTOBER QUARTERLY - AMENDMENT | | | | - | | - | 1JUL94 -30SEP94 | 1 | 94HSE/563/2399 |
| OCTOBER QUARTERLY - AMENDMENT | | | | - | | - | 1JUL94 -30SEP94 | 1 | 94HSE/564/5197 |
| PRE-GENERAL | | | | 61.142 | | 166.294 | 1OCT94 -19OCT94 | 58 | 94HSE/552/2341 |
| PRE-GENERAL - AMENDMENT | | | | - | | - | 1OCT94 -19OCT94 | 2 | 94HSE/554/3482 |
| PRE-GENERAL - AMENDMENT | | | | - | | - | 1OCT94 -19OCT94 | 2 | 94HSE/564/0820 |
| PRE-GENERAL - AMENDMENT | | | | - | | - | 1OCT94 -19OCT94 | 4 | 95HSE/568/0144 |
| 1ST LETTER INFORMATIONAL NOTICE | | | | | | | 1OCT94 -19OCT94 | 2 | 94FEC/954/4453 |
| POST-GENERAL | | | | 89.571 | | 197.665 | 20OCT94 -28NOV94 | 145 | 94HSE/561/0823 |
| POST-GENERAL - AMENDMENT | | | | - | | - | 26OCT94 -28NOV94 | 1 | 94HSE/564/5199 |
| POST-GENERAL - AMENDMENT | | | | 89.571 | | 197.666 | 20OCT94 -28NOV94 | 5 | 95HSE/568/3740 |
| YEAR-END | | | | 10.202 | | 10.987 | 29NOV94 -31DEC94 | 23 | 95HSE/568/2930 |
| TOTAL | | | 209.691 | 463.244 | 184.290 | 488.336 | | 658 | TOTAL PAGES |
| 3. AUTHORIZED COMMITTEES | | | | | | | | | |
| 4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN | | | | | | | | | |

NOTICE: THE DOCUMENTS LISTED ABOVE ARE AVAILABLE FOR PUBLIC INSPECTION AND COPYING AT THE FEC. ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERS
PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE. 2 U.S

950H3701025

| CANDIDATE/COMMITTEE/DOCUMENT | OFFICE SOUGHT/ | PARTY | RECEIPTS PRIMARY | RECEIPTS GENERAL | DISBURSEMENTS PRIMARY | DISBURSEMENTS GENERAL | COVERAGE DATES | # OF PAGES | MICROFILM LOCATION |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | TYPE OF FILER | | |
| | | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |

THE FOLLOWING INFORMATION IS AS REPORTED BY PARTY AND NON-PARTY COMMITTEES OR OTHER FILERS OUTSIDE THE CAMPAIGN

5. NON-PARTY AND OTHER COMMITTEES

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| "DYER, ELLIS, JOSEPH & MILLS PROFESSIONAL CORPORATION POLITICAL ACTION COMMITTEE" | | | | | | | ID# C00295758 | NON-PARTY | NON-QUALIFIED |
| DYER, ELLIS, JOSEPH & MILLS PROF CORP | | | | | | | | | |
| 1994 POST-GENERAL | | | 250 | | | | 31OCT94 | | 94FEC/946/2055 |
| ACTION FUND OF LEHMAN BROTHERS INC | | | | | | | ID# C00127670 | NON-PARTY | QUALIFIED |
| LEHMAN BROTHERS INC | | | | | | | | | |
| 1994 OCTOBER MONTHLY | | | 500 | | | | 13SEP94 | | 94FEC/926/2022 |
| ACTIVE BALLOT CLUB, A DEPT OF UNITED FOOD & COMMERCIAL WORKERS INT'L UNION | | | | | | | ID# C00002766 | NON-PARTY | QUALIFIED |
| FOOD & COMMERCIAL WRKRS INT'L UNION:UN | | | | | | | | | |
| 1994 JUNE MONTHLY | | | 1,000 | | | | 13MAY94 | | 94FEC/904/1871 |
| SEPTEMBER MONTHLY | | | 1,000 | | | | 15AUG94 | | 94FEC/923/4871 |
| OCTOBER MONTHLY | | | 1,000 | | | | 30SEP94 | | 94FEC/935/1497 |
| AFL-CIO COMMITTEE ON POLITICAL EDUCATION/POLITICAL CONTRIBUTIONS COMMITTEE | | | | | | | ID# C00003806 | NON-PARTY | QUALIFIED |
| AFL-CIO | | | | | | | | | |
| 1993 NOVEMBER MONTHLY | | | 500 | | | | 6OCT93 | | 93FEC/866/4567 |
| 1994 APRIL MONTHLY | | | 500 | | | | 2MAR94 | | 94FEC/891/1042 |
| OCTOBER MONTHLY | | | 2,500 | | | | 13SEP94 | | 94FEC/927/0890 |
| AIR LINE PILOTS ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00035451 | NON-PARTY | QUALIFIED |
| AIR LINE PILOTS ASS'N: INT'L | | | | | | | | | |
| 1993 YEAR-END | | | 1,000 | | | | 28OCT93 | | 94FEC/874/3318 |
| 1994 JULY MONTHLY | | | 1,000 | | | | 28JUN94 | | 94FEC/909/5490 |
| OCTOBER MONTHLY | | | 1,000 | | | | 29SEP94 | | 94FEC/929/0379 |
| AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION - POLITICAL ACTION COMMITTEE (ACTWU-PAC) | | | | | | | ID# C00005728 | NON-PARTY | QUALIFIED |
| CLOTHING & TEXTILE WORKERS: AMAL. | | | | | | | | | |
| 1994 OCTOBER MONTHLY | | | 500 | | | | 22SEP94 | | 94FEC/935/4609 |
| AMALGAMATED TRANSIT UNION-COPE | | | | | | | ID# C00032995 | NON-PARTY | QUALIFIED |
| TRANSIT UNION: AMALGAMATED | | | | | | | | | |
| 1993 NOVEMBER MONTHLY | | | 1,000 | | | | 12OCT93 | | 93FEC/866/4601 |
| 1994 SEPTEMBER MONTHLY | | | 500 | | | | 30AUG94 | | 94FEC/920/5427 |
| POST-GENERAL | | | 500 | | | | 28OCT94 | | 94FEC/945/0682 |
| AMERICA'S LEADERS' FUND (AKA CHICAGO CAMPAIGN COMMITTEE) | | | | | | | ID# C00188813 | NON-PARTY | QUALIFIED |
| NONE | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 1,000 | | | | 30JUN93 | | 93FEC/854/3983 |
| AMERICAN ACADEMY OF OPHTHALMOLOGY INC POLITICAL COMMITTEE ("OPHTHPAC") | | | | | | | ID# C00196246 | NON-PARTY | QUALIFIED |
| OPHTHALMOLOGY INC: AMERICAN ACADEMY | | | | | | | | | |
| 1993 SEPTEMBER MONTHLY | | | 500 | | | | 25AUG93 | | 93FEC/861/4655 |
| 1994 JULY MONTHLY | | | 1,000 | | | | 6JUN94 | | 94FEC/914/1534 |
| JULY MONTHLY | | | 2,000 | | | | 6JUN94 | | 94FEC/914/1534 |
| OCTOBER MONTHLY | | | 5,000 | | | | 12SEP94 | | 94FEC/935/3406 |
| AMERICAN ACADEMY OF PHYSICIAN ASSISTANTS POLITICAL ACTION COMMITTEE | | | | | | | ID# C00122499 | NON-PARTY | QUALIFIED |
| PHYSICIAN ASSISTANTS: AMER ACADEMY OF | | | | | | | | | |
| 1994 JULY QUARTERLY | | | 500 | | | | 29JUN94 | | 94FEC/915/1553 |

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PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE. 2 U.S

95043701026

| CANDIDATE/COMMITTEE/DOCUMENT | OFFICE SOUGHT/ | PARTY | RECEIPTS PRIMARY | RECEIPTS GENERAL | DISBURSEMENTS PRIMARY | DISBURSEMENTS GENERAL | COVERAGE DATES | # OF PAGES | MICROFILM LOCATION |
|---|---|---|---|---|---|---|---|---|---|
| | | | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | TYPE OF FILER | |
| AMERICAN AIDS POLITICAL ACTION COMMITTEE | | | | | | | ID# C00283101 NON-PARTY QUALIFIED | | |
| 1994 PRE-GENERAL | | | | 500 | | | 19OCT94 | | 94FEC/940/1911 |
| AMERICAN AMBULANCE ASSOCIATION FEDERAL PAC (AKA AMBU-PAC) | | | | | | | ID# C00168070 NON-PARTY QUALIFIED | | |
| AMERICAN AMBULANCE ASS'N | | | | | | | | | |
| 1994 PRE-GENERAL | | | | 500 | | | 10OCT94 | | 94FEC/935/2979 |
| AMERICAN ASSOCIATION FOR RESPIRATORY CARE POLITICAL ACTION COMMITTEE (AARCPAC) | | | | | | | ID# C00150201 NON-PARTY QUALIFIED | | |
| RESPIRATORY THERAPY; AMERICAN ASS'N | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | | 300 | | | 3MAR93 | | 93FEC/850/3545 |
| 1994 APRIL QUARTERLY | | | | 300 | | | 8MAR94 | | 94FEC/890/4740 |
| AMERICAN ASSOCIATION OF CLINICAL UROLOGISTS POLITICAL ACTION COMMITTEE (UROPAC) | | | | | | | ID# C00273003 NON-PARTY QUALIFIED | | |
| AMERICAN ASSOCIATION OF CLINICAL UROL | | | | | | | | | |
| 1994 JULY QUARTERLY | | | | 500 | | | 29APR94 | | 94FEC/909/0636 |
| POST-GENERAL | | - AMENDMENT | | 1,000 | | | 6OCT94 | | 95FEC/970/2656 |
| AMERICAN CHIROPRACTIC ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00102764 NON-PARTY QUALIFIED | | |
| CHIROPRACTIC ASS'N; AMERICAN | | | | | | | | | |
| 1993 SEPTEMBER MONTHLY | | | | 1,000 | | | 2AUG93 | | 93FEC/861/1981 |
| NOVEMBER MONTHLY | | | | 1,000 | | | 12OCT93 | | 93FEC/866/4765 |
| 1994 JULY MONTHLY | | | | 3,000 | | | 6JUN94 | | 94FEC/914/4087 |
| AMERICAN CONSULTING ENGINEERS POLITICAL ACTION COMMITTEE (ACE/PAC) | | | | | | | ID# C00010868 NON-PARTY QUALIFIED | | |
| ENGINEERS COUNCIL; AMERICAN CONSULTING | | | | | | | | | |
| 1994 PRE-GENERAL | | | | 500 | | | 5OCT94 | | 94FEC/940/1921 |
| AMERICAN COUNCIL OF LIFE INSURANCE, LIFE INSURANCE PAC | | | | | | | ID# C00147066 NON-PARTY QUALIFIED | | |
| INSURANCE; AMERICAN COUNCIL OF LIFE | | | | | | | | | |
| 1993 APRIL MONTHLY | | | | 500 | | | 9MAR93 | | 93FEC/834/1151 |
| NOVEMBER MONTHLY | | | | 500 | | | 12OCT93 | | 93FEC/866/0291 |
| 1994 APRIL MONTHLY | | | | 500 | | | 22MAR94 | | 94FEC/891/3661 |
| AMERICAN CYANAMID COMPANY GOOD GOVERNMENT FUND | | | | | | | ID# C00175000 NON-PARTY QUALIFIED | | |
| AMERICAN CYANAMID COMPANY | | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | | | 500 | | | 11AUG94 | | 94FEC/929/4049 |
| AMERICAN DEMOCRATIC POLITICAL ACTION COMMITTEE | | | | | | | ID# C00148577 NON-PARTY QUALIFIED | | |
| BLANK | | | | | | | | | |
| 1994 PRE-GENERAL | | | | 500 | | | 19OCT94 | | 94FEC/933/5026 |
| AMERICAN DENTAL POLITICAL ACTION COMMITTEE | | | | | | | ID# C00000729 NON-PARTY QUALIFIED | | |
| DENTAL ASS'N; AMERICAN | | | | | | | | | |
| 1993 APRIL MONTHLY | | | | 500 | | | 16MAR93 | | 93FEC/835/1546 |
| NOVEMBER MONTHLY | | | | 500 | | | 12OCT93 | | 93FEC/867/2281 |
| DECEMBER MONTHLY | | | | 1,500 | | | 23NOV93 | | 93FEC/869/0854 |
| 1994 APRIL MONTHLY | | | | 500 | | | 15MAR94 | | 94FEC/895/0338 |
| MAY MONTHLY | | | | 500 | | | 5APR94 | | 94FEC/899/1386 |
| JULY MONTHLY | | | | 2,500 | | | 21JUN94 | | 94FEC/912/5446 |
| AMERICAN DIETETIC ASSOCIATION POLITICAL ACTION COMMITTEE, THE | | | | | | | ID# C00143560 NON-PARTY QUALIFIED | | |
| DIETETIC ASSOCIATION; AMERICAN | | | | | | | | | |
| 1994 PRE-GENERAL | | | | 500 | | | 19OCT94 | | 94FEC/944/1649 |
| AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES' POLITICAL ACTION COMMITTEE | | | | | | | ID# C00009936 NON-PARTY QUALIFIED | | |
| EMPLOYEES; AMER. FED'N OF GOV'T | | | | | | | | | |
| 1994 MAY MONTHLY | | | | 250 | | | 5APR94 | | 94FEC/899/5151 |

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| | | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| NOVEMBER MONTHLY | | | 700 | | | | 12OCT94 | | 94FEC/944/1670 |
| AMERICAN FEDERATION OF MUSICIANS - TEMPO POLITICAL CONTRIBUTIONS COMMITTEE | | | | | | | ID# C00073627 | NON-PARTY | QUALIFIED |
| MUSICIANS: AMERICAN FED'N OF | | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | | 200 | | | | 16SEP94 | | 94FEC/927/3974 |
| AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES - P E O P L E. QUALIFIED | | | | | | | ID# C00011114 | NON-PARTY | QUALIFIED |
| EMPLOYEES: AMER. FED. OF STATE. COUNTY | | | | | | | | | |
| 1993 MAY MONTHLY | | | 500 | | | | 6APR93 | | 93FEC/840/2868 |
| DECEMBER MONTHLY | | | 1,000 | | | | 15NOV93 | | 93FEC/870/3638 |
| 1994 APRIL MONTHLY | | | 2,000 | | | | 24MAR94 | | 94FEC/896/2964 |
| JULY MONTHLY | | | 2,000 | | | | 3JUN94 | | 94FEC/909/4599 |
| PRE-GENERAL | | | 5,000 | | | | 17OCT94 | | 94FEC/939/4436 |
| AMERICAN FEDERATION OF TEACHERS COMMITTEE ON POLITICAL EDUCATION | | | | | | | ID# C00028860 | NON-PARTY | QUALIFIED |
| TEACHERS: AMERICAN FED'N OF | | | | | | | | | |
| 1994 JULY QUARTERLY | | | 2,500 | | | | 16JUN94 | | 94FEC/906/3370 |
| PRE-GENERAL | | | 2,500 | | | | 30CT94 | | 94FEC/935/2077 |
| AMERICAN HEALTH CARE ASSOCIATION POLITICAL ACTION COMMITTEE (AHCA-PAC) | | | | | | | ID# C00006080 | NON-PARTY | QUALIFIED |
| HEALTH CARE ASS'N: AMERICAN | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 1,000 | | | | 5MAR93 | | 93FEC/836/0009 |
| DECEMBER MONTHLY | | | 500 | | | | 5NOV93 | | 93FEC/870/3045 |
| 1994 APRIL MONTHLY | | | 500 | | | | 11MAR94 | | 94FEC/894/1184 |
| JUNE MONTHLY | | | 1,000 | | | | 27MAY94 | | 94FEC/903/1169 |
| SEPTEMBER MONTHLY | | | 2,000 | | | | 12AUG94 | | 94FEC/922/3575 |
| POST-GENERAL | | | 1,000 | | | | 24OCT94 | | 94FEC/946/3755 |
| AMERICAN INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS EFFECTIVE LEGISLATION COMMITTEE (AICPA) | | | | | | | ID# C00077321 | NON-PARTY | QUALIFIED |
| ACCOUNTANTS: AM INST OF CERTIFIED PUB | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 17MAR93 | | 93FEC/836/1630 |
| NOVEMBER MONTHLY | | | 500 | | | | 11OCT93 | | 93FEC/868/1980 |
| 1994 APRIL MONTHLY | | | 500 | | | | 7MAR94 | | 94FEC/896/5221 |
| JUNE MONTHLY | | | 4,000 | | | | 19MAY94 | | 94FEC/906/4972 |
| AUGUST MONTHLY | | | 500- | | | | 19MAY94 | | 94FEC/919/4822 |
| AUGUST MONTHLY | | | 500 | | | | 31JUL94 | | 94FEC/919/4822 |
| SEPTEMBER MONTHLY | | | 2,000 | | | | 31AUG94 | | 94FEC/924/1883 |
| PRE-GENERAL | | | 2,500 | | | | 40CT94 | | 94FEC/938/0095 |
| AMERICAN MARITIME OFFICERS, AFL-CIO VOLUNTARY POLITICAL ACTION FUND | | | | | | | ID# C00027532 | NON-PARTY | QUALIFIED |
| AMER MARITIME OFC PET ASSOC VOL PAF | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 12MAR93 | | 93FEC/836/3639 |
| NOVEMBER MONTHLY | | | 1,000 | | | | 60CT93 | | 93FEC/867/3825 |
| 1994 APRIL MONTHLY | | | 500 | | | | 10MAR94 | | 94FEC/896/3971 |
| JULY MONTHLY | | | 1,000 | | | | 16JUN94 | | 94FEC/913/5244 |
| PRE-GENERAL | | | 500 | | | | 80CT94 | | 94FEC/939/2821 |
| AMERICAN MEDICAL ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00000422 | NON-PARTY | QUALIFIED |
| MEDICAL ASS'N: AMERICAN (AMPAC) | | | | | | | | | |
| 1993 AUGUST MONTHLY | | | 500 | | | | 19JUL93 | | 93FEC/856/3672 |
| 1994 APRIL MONTHLY | | | 1,250 | | | | 29MAR94 | | 94FEC/891/1582 |
| OCTOBER MONTHLY | | | 3,500 | | | | 21SEP94 | | 94FEC/934/0021 |
| AMERICAN NURSES' ASSOCIATION PAC (ANA-PAC) (ANA N-CAP) | | | | | | | ID# C00017525 | NON-PARTY | QUALIFIED |

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| | | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| NURSES' ASS'N: AMERICAN | | | | | | | | | |
| 1994 JUNE MONTHLY | | | 5,000 | | | | 19MAY94 | | 94FEC/904/2324 |
| PRE-GENERAL | | | 2,000 | | | | 6OCT94 | | 94FEC/940/4324 |
| AMERICAN OCCUPATIONAL THERAPY ASSOCIATION INC POLITICAL ACTION COMMITTEE | | | | | | | ID# C00089086 | NON-PARTY | QUALIFIED |
| OCCUPATIONAL THERAPY ASS'N: AMERICAN | | | | | | | | | |
| 1993 YEAR-END | | | 500 | | | | 22JUL93 | | 94FEC/880/1473 |
| YEAR-END | | | 1,000 | | | | 21OCT93 | | 94FEC/880/1476 |
| 1994 APRIL MONTHLY | | | 500 | | | | 15MAR94 | | 94FEC/896/0290 |
| APRIL MONTHLY | | | 500 | | | | 31MAR94 | | 94FEC/896/0292 |
| JULY MONTHLY | | | 1,000 | | | | 28JUN94 | | 94FEC/913/5213 |
| OCTOBER MONTHLY | | | 1,500 | | | | 21SEP94 | | 94FEC/935/1405 |
| AMERICAN OPTOMETRIC ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00024968 | NON-PARTY | QUALIFIED |
| OPTOMETRIC ASS'N INC: AMERICAN | | | | | | | | | |
| 1993 POST-SPECIAL | | | 500 | | | | 27JUL93 | | 94FEC/872/0859 |
| POST-SPECIAL | | | 500 | | | | 5OCT93 | | 94FEC/872/0859 |
| PRE-RUN-OFF | | | 500 | | | | 13MAY93 | | 93FEC/840/3910 |
| 1994 APRIL MONTHLY | | | 500 | | | | 10MAR94 | | 94FEC/895/4267 |
| OCTOBER MONTHLY | | | 1,000 | | | | 20SEP94 | | 94FEC/934/0126 |
| OCTOBER MONTHLY | | | 500 | | | | 30SEP94 | | 94FEC/934/0134 |
| POST-GENERAL | | | 500 | | | | 24OCT94 | | 94FEC/948/0132 |
| AMERICAN PHARMACEUTICAL ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00193854 | NON-PARTY | QUALIFIED |
| PHARMACEUTICAL ASSOCIATION : AMERICAN | | | | | | | | | |
| 1994 PRE-GENERAL | | | 500 | | | | 7OCT94 | | 94FEC/938/4858 |
| AMERICAN PHYSICAL THERAPY CONGRESSIONAL ACTION COMMITTEE | | | | | | | ID# C00012880 | NON-PARTY | QUALIFIED |
| PHYSICAL THERAPY ASS'N: AMERICAN | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 8MAR93 | | 93FEC/836/1656 |
| AUGUST MONTHLY | | | 500 | | | | 14JUL93 | | 93FEC/857/3315 |
| NOVEMBER MONTHLY | | | 1,000 | | | | 10CT93 | | 93FEC/867/4182 |
| 1994 JULY MONTHLY | | | 2,500 | | | | 22JUN94 | | 94FEC/911/4957 |
| OCTOBER MONTHLY | | | 500 | | | | 16SEP94 | | 94FEC/933/5223 |
| AMERICAN PILOTS' ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00041061 | NON-PARTY | QUALIFIED |
| PILOTS' ASSOCIATION INC: AMERICAN | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 11MAR93 | | 93FEC/833/2289 |
| OCTOBER MONTHLY | | | 500 | | | | 21SEP93 | | 93FEC/864/1968 |
| 1994 AUGUST MONTHLY | | | 1,000 | | | | 22JUL94 | | 94FEC/918/1684 |
| SEPTEMBER MONTHLY | | | 700 | | | | 15AUG94 | | 94FEC/924/0606 |
| AMERICAN PRESIDENT COMPANIES LTD POLITICAL ACTION COMMITTEE | | | | | | | ID# C00137828 | NON-PARTY | QUALIFIED |
| AMERICAN PRESIDENT LINES LTD | | | | | | | | | |
| 1993 PRE-SPECIAL | | | 500 | | | | 5MAR93 | | 93FEC/833/2228 |
| 1994 OCTOBER MONTHLY | | | 500 | | | | 26SEP94 | | 94FEC/935/5008 |
| AMERICAN SOCIETY OF ANESTHESIOLOGISTS POLITICAL ACTION COMMITTEE (ASAPAC) | | | | | | | ID# C00255752 | NON-PARTY | QUALIFIED |
| AMER SOCIETY OF ANESTHESIOLOGISTS INC | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 1,000 | | | | 8MAR93 | | 93FEC/836/3422 |
| AUGUST MONTHLY | | | 500 | | | | 22JUL93 | | 93FEC/857/1663 |
| OCTOBER MONTHLY | | | 500 | | | | 30SEP93 | | 93FEC/865/0523 |
| 1994 APRIL MONTHLY | | | 2,000 | | | | 14MAR94 | | 94FEC/894/2612 |

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| JULY MONTHLY | | | 1,000 | | | | 6JUN94 | | 94FEC/912/1323 |
| OCTOBER MONTHLY | | | 1,000 | | | | 7SEP94 | | 94FEC/926/0917 |
| POST-GENERAL | | | 1,000 | | | | 25OCT94 | | 94FEC/950/4026 |
| AMERICAN SOCIETY OF INTERNAL MEDICINE PAC (ASIMPAC) | | | | | | | ID# C00280578 | NON-PARTY | QUALIFIED |
| AMERICAN SOCIETY OF INTERNAL MEDICINE | | | | | | | | | |
| 1994 PRE-GENERAL | | | 500 | | | | 19OCT94 | | 94FEC/937/2123 |
| AMERICAN SOCIETY OF TRAVEL AGENTS PAC | | | | | | | ID# C00114108 | NON-PARTY | QUALIFIED |
| TRAVEL AGENTS INC: AMERICAN SOCIETY | | | | | | | | | |
| 1994 APRIL QUARTERLY | | | 200 | | | | 30MAR94 | | 94FEC/889/4286 |
| AMERICAN TELEPHONE & TELEGRAPH COMPANY POLITICAL ACTION COMMITTEE (AT&T PAC) | | | | | | | ID# C00185124 | NON-PARTY | QUALIFIED |
| AT&T / MCCAW PAC | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 23MAR93 | | 93FEC/835/4164 |
| SEPTEMBER MONTHLY | | | 250 | | | | 19AUG93 | | 93FEC/861/0821 |
| NOVEMBER MONTHLY | | | 500 | | | | 14OCT93 | | 93FEC/867/0655 |
| 1994 APRIL MONTHLY | | | 1,000 | | | | 22MAR94 | | 94FEC/896/4744 |
| AUGUST MONTHLY | | | 500 | | | | 21JUL94 | | 94FEC/918/0538 |
| PRE-GENERAL | | | 500 | | | | 20OCT94 | | 94FEC/940/0690 |
| AMERICAN VETERINARY MEDICAL ASSOCIATION POLITICAL ACTION COMMITTEE (AVMAPAC) | | | | | | | ID# C00114132 | NON-PARTY | QUALIFIED |
| VETERINARY MEDICAL ASS'N: AMERICAN | | | | | | | | | |
| 1993 OCTOBER MONTHLY | | | 1,000 | | | | 20SEP93 | | 93FEC/864/0133 |
| ARCHIPAC/THE AMERICAN INSTITUTE OF ARCHITECTS | | | | | | | ID# C00139071 | NON-PARTY | QUALIFIED |
| ARCHITECTS: THE AMERICAN INSTITUTE OF | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 11MAR93 | | 93FEC/853/0021 |
| YEAR-END | | | 500 | | | | 12OCT93 | | 94FEC/889/2330 |
| 1994 OCTOBER QUARTERLY | | | 700 | | | | 24AUG94 | | 94FEC/928/0146 |
| ARTHUR ANDERSEN/ANDERSEN CONSULTING PAC (ARTHUR ANDERSEN & CO PAC) | | | | | | | ID# C00221168 | NON-PARTY | QUALIFIED |
| NONE | | | | | | | | | |
| 1994 OCTOBER MONTHLY | | | 1,500 | | | | 19SEP94 | | 94FEC/931/1097 |
| ASSOCIATION FOR HEALTH CARE REFORM | | | | | | | ID# C00276998 | NON-PARTY | NON-QUALIFIED |
| NONE | | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | | 1,000 | | | | 6SEP94 | | 94FEC/930/3106 |
| ASSOCIATION FOR THE ADVANCEMENT OF PSYCHOLOGY INC PSYCHOLOGISTS FOR LEG ACTION NOW (PLAN) | | | | | | | ID# C00002956 | NON-PARTY | QUALIFIED |
| PSYCHOLOGY: ASS'N FOR THE ADVANCE. OF | | | | | | | | | |
| 1993 PRE-SPECIAL | | | 500 | | | | 11MAR93 | | 93FEC/833/0547 |
| 1994 APRIL QUARTERLY | | | 1,000 | | | | 8MAR94 | | 94FEC/892/1780 |
| ASSOCIATION OF FLIGHT ATTENDANTS POLITICAL ACTION COMMITTEE ("FLIGHT PAC") | | | | | | | ID# C00151811 | NON-PARTY | QUALIFIED |
| FLIGHT ATTENDANTS: ASS'N OF | | | | | | | | | |
| 1994 JULY MONTHLY | | | 750 | | | | 28JUN94 | | 94FEC/913/3991 |
| ASSOCIATION OF TRIAL LAWYERS OF AMERICA POLITICAL ACTION COMMITTEE | | | | | | | ID# C00024521 | NON-PARTY | QUALIFIED |
| LAWYERS OF AMERICA: ASS'N OF TRIAL | | | | | | | | | |
| 1993 PRE-SPECIAL | | | 500 | | | | 15MAR93 | | 93FEC/834/3680 |
| YEAR-END | | | 500 | | | | 7OCT93 | | 94FEC/877/4315 |
| YEAR-END | | | 500 | | | | 13OCT93 | | 94FEC/877/4315 |
| 1994 APRIL MONTHLY | | | 3,500 | | | | 14MAR94 | | 94FEC/896/1816 |
| SEPTEMBER MONTHLY | | | 5,000 | | | | 8AUG94 | | 94FEC/924/0702 |
| ATLANTIC CITY ELECTRIC COMPANY FEDERAL POLITICAL ACTION COMMITTEE | | | | | | | ID# C00222109 | NON-PARTY | QUALIFIED |

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| ATLANTIC CITY ELECTRIC COMPANY | | | | | | | | |
| 1993 MID-YEAR REPORT | | 200 | | | | 10MAR93 | | 93FEC/852/0791 |
| MID-YEAR REPORT | | 350 | | | | 13APR93 | | 93FEC/852/0791 |
| 1994 JULY QUARTERLY | | 250 | | | | 26APR94 | | 94FEC/911/2348 |
| POST-GENERAL | | 300 | | | | 6OCT94 | | 94FEC/968/3387 |
| BAKERY, CONFECTIONERY AND TOBACCO WORKERS INTERNATIONAL UNION POLITICAL ACTION COMMITTEE | | | | | | ID# C00127621 NON-PARTY | | QUALIFIED |
| BAKERY CONFECTIONERY & TOBACCO WORKERS | | | | | | | | |
| 1994 FEBRUARY MONTHLY | | 1,000 | | | | 3JAN94 | | 94FEC/884/0049 |
| BALTIMORE GAS AND ELECTRIC COMPANY POLITICAL ACTION COMMITTEE (BG&E PAC) | | | | | | ID# C00041376 NON-PARTY | | QUALIFIED |
| BALTIMORE GAS & ELECTRIC COMPANY | | | | | | | | |
| 1994 POST-GENERAL | | 500 | | | | 14OCT94 | | 94FEC/948/4248 |
| BAXTER HEALTHCARE CORPORATION POLITICAL ACTION COMMITTEE | | | | | | ID# C00117036 NON-PARTY | | QUALIFIED |
| BAXTER HEALTHCARE CORPORATION | | | | | | | | |
| 1993 YEAR-END | | 500 | | | | 12AUG93 | | 94FEC/872/2830 |
| BELL ATLANTIC CORPORATION POLITICAL ACTION COMMITTEE | | | | | | ID# C00186288 NON-PARTY | | QUALIFIED |
| BELL ATLANTIC CORPORATION | | | | | | | | |
| 1993 YEAR-END | | 500 | | | | 15NOV93 | | 94FEC/873/3389 |
| 1994 JULY QUARTERLY | | 500 | | | | 12APR94 | | 94FEC/917/1422 |
| PRE-GENERAL | | 500 | | | | 19OCT94 | | 94FEC/937/4900 |
| BELLSOUTH CORPORATION FEDERAL POLITICAL ACTION COMMITTEE | | | | | | ID# C00174060 NON-PARTY | | QUALIFIED |
| BELLSOUTH CORPORATION | | | | | | | | |
| 1993 YEAR-END | | 500 | | | | 26OCT93 | | 94FEC/880/1932 |
| 1994 APRIL MONTHLY | | 500 | | | | 24MAR94 | | 94FEC/896/3710 |
| BOAT OWNERS ASSOCIATION OF THE UNITED STATES (BOAT/US) POLITICAL ACTION COMMITTEE | | | | | | ID# C00160812 NON-PARTY | | QUALIFIED |
| BOAT OWNERS ASSN OF THE (BOAT/U.S.) | | | | | | | | |
| 1994 PRE-GENERAL | | 500 | | | | 12OCT94 | | 94FEC/938/5175 |
| BRISTOL-MYERS SQUIBB COMPANY EMPLOYEE POLITICAL ACTION COMMITTEE | | | | | | ID# C00035675 NON-PARTY | | QUALIFIED |
| BRISTOL-MYERS SQUIBB COMPANY | | | | | | | | |
| 1994 POST-GENERAL | | 500 | | | | 20OCT94 | | 94FEC/953/3925 |
| BROTHERHOOD OF LOCOMOTIVE ENGINEERS PAC FUND | | | | | | ID# C00099234 NON-PARTY | | QUALIFIED |
| ENGINEERS: BROTH D OF LOCOMOTIVE | | | | | | | | |
| 1993 APRIL MONTHLY | | 250 | | | | 30MAR93 | | 93FEC/835/1351 |
| NOVEMBER MONTHLY | | 500 | | | | 5OCT93 | | 93FEC/866/2318 |
| 1994 MARCH MONTHLY | | 500 | | | | 28FEB94 | | 94FEC/886/4453 |
| AUGUST MONTHLY | | 1,000 | | | | 13JUL94 | | 94FEC/918/2432 |
| PRE-GENERAL | | 500 | | | | 4OCT94 | | 94FEC/935/4675 |
| POST-GENERAL | | 500 | | | | 21OCT94 | | 94FEC/946/0317 |
| BROTHERHOOD OF RAILROAD SIGNALMEN POLITICAL ACTION COMMITTEE | | | | | | ID# C00011262 NON-PARTY | | QUALIFIED |
| RAILROAD SIGNALMEN; BROTHERHOOD OF | | | | | | | | |
| 1993 APRIL MONTHLY | | 300 | | | | 11MAR93 | | 93FEC/835/4281 |
| MAY MONTHLY | | 250 | | | | 21APR93 | | 93FEC/839/2535 |
| DECEMBER MONTHLY | | 300 | | | | 4NOV93 | | 93FEC/869/2004 |
| 1994 JULY MONTHLY | | 500 | | | | 24JUN94 | | 94FEC/907/3702 |
| BROWN & WILLIAMSON TOBACCO CORPORATION EMPLOYEE POLITICAL ACTION COMMITTEE AKA EMPAC | | | | | | ID# C00087791 NON-PARTY | | QUALIFIED |
| BROWN & WILLIAMS TOBACCO CORPORATION | | | | | | | | |
| 1993 YEAR-END | | 500 | | | | 19OCT93 | | 94FEC/875/5284 |

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| | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| BUILD POLITICAL ACTION COMMITTEE OF THE NATIONAL ASSOCIATION OF HOME BUILDERS | | | | | | ID# C00000901 NON-PARTY QUALIFIED | | |
| HOME BUILDERS: NAT'L ASS'N OF | | | | | | | | |
| 1994 PRE-GENERAL | | 1,000 | | | | 30CT94 | | 94FEC/937/3762 |
| BURLINGTON NORTHERN RAILROAD RAILPAC (BN RAILPAC) | | | | | | ID# C00235739 NON-PARTY QUALIFIED | | |
| BURLINGTON NORTHERN RAILROAD | | | | | | | | |
| 1993 APRIL MONTHLY | | 500 | | | | 24MAR93 | | 93FEC/834/0132 |
| BUSPAC-POLITICAL ACTION COMMITTEE OF THE AMERICAN BUS ASSOCIATION | | | | | | ID# C00004879 NON-PARTY QUALIFIED | | |
| BUS ASS'N: AMERICAN | | | | | | | | |
| 1994 PRE-GENERAL | | 500 | | | | 12OCT94 | | 94FEC/938/1056 |
| CAREER COLLEGE POLITICAL ACTION COMMITTEE (FKA NATIONAL ASSOC OF TRADE AND TECH SCHLS PAC) | | | | | | ID# C00213066 NON-PARTY QUALIFIED | | |
| CAREER COLLEGE ASSOCIATION | | | | | | | | |
| 1994 APRIL QUARTERLY | | 250 | | | | 15MAR94 | | 94FEC/891/4921 |
| CAREPAC. THE BLUE CROSS AND BLUE SHIELD ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | ID# C00194746 NON-PARTY QUALIFIED | | |
| BLUE CROSS & BLUE SHIELD | | | | | | | | |
| 1993 PRE-SPECIAL | | 500 | | | | 17MAR93 | | 93FEC/842/0832 |
| 1994 PRE-GENERAL | | 500 | | | | 30CT94 | | 94FEC/936/4233 |
| CARPENTERS LEGISLATIVE IMPROVEMENT COMM. UNITED BROTHERHOOD OF CARPENTERS & JOINERS OF AME | | | | | | ID# C00001016 NON-PARTY QUALIFIED | | |
| CARPENTERS & JOINERS OF AMER: UN BRTHD | | | | | | | | |
| 1993 DECEMBER MONTHLY | | 2,000 | | | | 30NOV93 | | 93FEC/869/0978 |
| 1994 JULY MONTHLY | | 2,000 | | | | 21JUN94 | | 94FEC/908/2833 |
| SEPTEMBER MONTHLY | | 1,000 | | | | 31AUG94 | | 94FEC/920/4503 |
| POST-GENERAL | | 1,000 | | | | 29OCT94 | | 94FEC/945/5380 |
| CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | ID# C00262295 NON-PARTY QUALIFIED | | |
| CELLULAR TELECOMM INDUSTRY ASSOC | | | | | | | | |
| 1994 OCTOBER MONTHLY | | 250 | | | | 19SEP94 | | 94FEC/931/0142 |
| POST-GENERAL | | 250- | | | | 28NOV94 | | 94FEC/948/0337 |
| CHIEF DEPUTY WHIP'S FUND | | | | | | ID# C00292995 NON-PARTY QUALIFIED | | |
| NONE | | | | | | | | |
| 1994 JULY MONTHLY | | 500 | | | | 28JUN94 | | 94FEC/911/4906 |
| CLEAN WATER/VOTE ENVIRONMENT | | | | | | ID# C00251942 NON-PARTY QUALIFIED | | |
| VOTE ENVIRONMENT/NJEF PAC (AFFL) | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | 50 | | | | 25SEP94 | | 94FEC/932/3864 |
| PRE-GENERAL | | 215 | | | | 10CT94 | | 94FEC/940/1853 |
| PRE-GENERAL | | 7 | | | | 10CT94 | | 94FEC/940/1853 |
| PRE-GENERAL | | 62 | | | | 30CT94 | | 94FEC/940/1857 |
| PRE-GENERAL | | 100 | | | | 90CT94 | | 94FEC/940/1859 |
| PRE-GENERAL | | 2 | | | | 90CT94 | | 94FEC/940/1859 |
| PRE-GENERAL | | 100 | | | | 160CT94 | | 94FEC/940/1860 |
| PRE-GENERAL | | 4 | | | | 160CT94 | | 94FEC/940/1860 |
| YEAR-END | | 50 | | | | 25SEP94 | | 95FEC/962/3953 |
| YEAR-END | | 215 | | | | 10CT94 | | 95FEC/962/3956 |
| YEAR-END | | 7 | | | | 10CT94 | | 95FEC/962/3957 |
| YEAR-END | | 62 | | | | 30CT94 | | 95FEC/962/3961 |
| YEAR-END | | 100 | | | | 90CT94 | | 95FEC/962/3962 |
| YEAR-END | | 2 | | | | 90CT94 | | 95FEC/962/3963 |
| YEAR-END | | 100 | | | | 160CT94 | | 95FEC/962/3963 |

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| | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| YEAR-END | | 4 | | | | 16OCT94 | | 95FEC/962/3964 |
| YEAR-END | | 80 | | | | 24OCT94 | | 95FEC/962/3966 |
| YEAR-END | | 3 | | | | 24OCT94 | | 95FEC/962/3968 |
| YEAR-END | | 590 | | | | 4NOV94 | | 95FEC/962/3969 |
| COLLEGE OF AMERICAN PATHOLOGISTS POLITICAL ACTION COMMITTEE | | | | | | ID# C00274944 NON-PARTY QUALIFIED | | |
| COLLEGE OF AMERICAN PATHOLOGISTS | | | | | | | | |
| 1994 AUGUST MONTHLY | | 1,000 | | | | 13JUL94 | | 94FEC/916/4789 |
| POST-GENERAL | | 1,000 | | | | 2NOV94 | | 94FEC/945/1302 |
| COMCAST CORPORATION POLITICAL ACTION COMMITTEE | | | | | | ID# C00248716 NON-PARTY QUALIFIED | | |
| COMCAST CORPORATION | | | | | | | | |
| 1994 SEPTEMBER MONTHLY | | 350 | | | | 25AUG94 | | 94FEC/923/2205 |
| PRE-GENERAL | | 500 | | | | 6OCT94 | | 94FEC/935/2635 |
| POST-GENERAL | | 850- | | | | 4NOV94 | | 94FEC/946/0591 |
| COMMITTEE FOR A PROGRESSIVE CONGRESS INC | | | | | | ID# C00196824 NON-PARTY QUALIFIED | | |
| NONE | | | | | | | | |
| 1994 POST-GENERAL | | 500 | | | | 26OCT94 | | 94FEC/947/0436 |
| COMMITTEE FOR QUALITY ORTHOPAEDIC HEALTH CARE INC | | | | | | ID# C00210542 NON-PARTY QUALIFIED | | |
| NONE | | | | | | | | |
| 1993 APRIL MONTHLY | | 239 | | | | 3MAR93 | | 93FEC/836/1731 |
| APRIL MONTHLY | | 500 | | | | 16MAR93 | | 93FEC/836/1731 |
| AUGUST MONTHLY | | 250 | | | | 27JUL93 | | 93FEC/857/5059 |
| 1994 APRIL MONTHLY | | 500 | | | | 14MAR94 | | 94FEC/897/2624 |
| SEPTEMBER MONTHLY | | 1,000 | | | | 26AUG94 | | 94FEC/923/3888 |
| COMMITTEE FOR RESPONSIBLE GOVERNMENT - DOMINION RESOURCES INC | | | | | | ID# C00108209 NON-PARTY QUALIFIED | | |
| VIRGINIA ELECTRIC AND POWER COMPANY | | | | | | | | |
| 1993 APRIL MONTHLY | | 350 | | | | 29MAR93 | | 93FEC/836/1714 |
| COMMITTEE FOR THOROUGH AGRICULTURAL POLITICAL EDUCATION OF ASSOCIATED MILK PRODUCERS, INC | | | | | | ID# C00001594 NON-PARTY QUALIFIED | | |
| MILK PRODUCERS INC: ASSOCIATED | | | | | | | | |
| 1994 PRE-GENERAL | | 500 | | | | 17OCT94 | | 94FEC/937/2474 |
| COMMITTEE ON LETTER CARRIERS POLITICAL EDUCATION (LETTER CARRIERS POLITICAL ACTION FUND) | | | | | | ID# C00023580 NON-PARTY QUALIFIED | | |
| LETTER CARRIERS OF USA: NAT'L ASS'N OF | | | | | | | | |
| 1993 NOVEMBER MONTHLY | | 1,000 | | | | 21OCT93 | | 93FEC/867/3305 |
| 1994 JUNE MONTHLY | | 4,000 | | | | 10MAY94 | | 94FEC/903/3381 |
| JULY MONTHLY | | 2,500 | | | | 6JUN94 | | 94FEC/913/1822 |
| POST-GENERAL | | 2,500 | | | | 26OCT94 | | 94FEC/947/2944 |
| COMMONWEALTH EDISON POLITICAL ACTION COMMITTEE | | | | | | ID# C00141218 NON-PARTY QUALIFIED | | |
| COMMONWEALTH EDISON COMPANY | | | | | | | | |
| 1993 MAY MONTHLY | | 350 | | | | 15APR93 | | 93FEC/839/2441 |
| CONGRESSIONAL AGENDA: 90'S | | | | | | ID# C00151282 NON-PARTY QUALIFIED | | |
| NONE | | | | | | | | |
| 1994 POST-GENERAL | | 250 | | | | 5NOV94 | | 94FEC/954/3538 |
| CONGRESSMAN WAXMAN CAMPAIGN COMMITTEE | | | | | | ID# C00013128 HOUSE | | |
| 1994 PRE-GENERAL | | 1,000 | | | | 14OCT94 | | 94HSE/555/1531 |
| CONSOLIDATED RAIL CORPORATION GOOD GOVERNMENT FUND (CONRAIL GOOD GOVERNMENT FUND) | | | | | | ID# C00174185 NON-PARTY QUALIFIED | | |
| CONSOLIDATED RAIL CORPORATION | | | | | | | | |
| 1993 MID-YEAR REPORT | | 500 | | | | 21APR93 | | 93FEC/848/2755 |

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| 1994 APRIL QUARTERLY | | | 500 | | | | 22MAR94 | | 94FEC/890/0263 |
| OCTOBER QUARTERLY | | | 500 | | | | 30SEP94 | | 94FEC/926/5190 |
| CONSUMERS POWER COMPANY EMPLOYEES FOR BETTER GOVERNMENT - FEDERAL | | | | | | | ID# C00073473 | NON-PARTY | QUALIFIED |
| CONSUMERS POWER COMPANY | | | | | | | | | |
| 1993 MAY MONTHLY | | | 350 | | | | 14APR93 | | 93FEC/840/1756 |
| 1994 POST-GENERAL | | | 500 | | | | 20OCT94 | | 94FEC/949/3405 |
| CONTINENTAL AIRLINES INC EMPLOYEE FUND FOR A BETTER AMERICA (FKA CONTINENTAL HOLDINGS PAC) | | | | | | | ID# C00101766 | NON-PARTY | QUALIFIED |
| CONTINENTAL AIRLINES INC | | | | | | | | | |
| 1994 PRE-GENERAL | | | 500 | | | | 12OCT94 | | 94FEC/937/2192 |
| COOPERS & LYBRAND PAC | | | | | | | ID# C00107235 | NON-PARTY | QUALIFIED |
| COOPERS & LYBRAND | | | | | | | | | |
| 1993 YEAR-END | | | 1,000 | | | | 21DEC93 | | 94FEC/887/2098 |
| 1994 MAY MONTHLY | | | 1,000 | | | | 18APR94 | | 94FEC/904/1096 |
| OCTOBER MONTHLY | | | 250 | | | | 19SEP94 | | 94FEC/943/3978 |
| OCTOBER MONTHLY | | | 1,500 | | | | 19SEP94 | | 94FEC/943/3979 |
| OCTOBER MONTHLY | - AMENDMENT | | 1,000- | | | | 30SEP94 | | 94FEC/949/0960 |
| COPE COMMITTEE OF THE UNITED RUBBER CORK LINOLEUM AND PLASTIC WORKERS OF AMERICA AFL-CIO | | | | | | | ID# C00004283 | NON-PARTY | QUALIFIED |
| RUBBER CORK LINOLEUM & PLASTIC WORKERS | | | | | | | | | |
| 1994 AUGUST MONTHLY | | | 1,000 | | | | 11JUL94 | | 94FEC/917/0099 |
| CORNING EMPLOYEES POLITICAL ACTION COMMITTEE | | | | | | | ID# C00033589 | NON-PARTY | QUALIFIED |
| CORNING INCORPORATED | | | | | | | | | |
| 1994 PRE-GENERAL | | | 1,000 | | | | 19OCT94 | | 94FEC/936/4198 |
| CORPORATION FOR THE ADVANCEMENT OF PSYCHIATRY POLITICAL ACTION COMMITTEE (CAPPAC) | | | | | | | ID# C00147736 | NON-PARTY | QUALIFIED |
| PSYCHIATRY; CORPORATION/ADVANCEMENT OF | | | | | | | | | |
| 1993 YEAR-END | | | 500 | | | | 13AUG93 | | 94FEC/877/4223 |
| 1994 APRIL QUARTERLY | | | 250 | | | | 30MAR94 | | 94FEC/891/5216 |
| COSMETIC, TOILETRY & FRAGRANCE ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00113845 | NON-PARTY | QUALIFIED |
| COSMETIC TOILETRY & FRAGRANCE ASSN INC | | | | | | | | | |
| 1993 APRIL QUARTERLY | | | 500 | | | | 17MAR93 | | 93FEC/835/0570 |
| COUNCIL OF INSURANCE AGENTS & BROKERS POLITICAL ACTION COMMITTEE; THE | | | | | | | ID# C00039578 | NON-PARTY | QUALIFIED |
| CASUALTY & SURETY AGENTS; NAT'L ASS'N | | | | | | | | | |
| 1994 JULY QUARTERLY | | | 500 | | | | 28JUN94 | | 94FEC/909/0589 |
| OCTOBER QUARTERLY | | | 500 | | | | 27SEP94 | | 94FEC/929/4817 |
| CRUISE POLITICAL ACTION COMMITTEE | | | | | | | ID# C00256040 | NON-PARTY | QUALIFIED |
| NONE | | | | | | | | | |
| 1994 PRE-GENERAL | | | 500 | | | | 12OCT94 | | 94FEC/942/5134 |
| CSX TRANSPORTATION INC PAC (FKA SEABOARD SYSTEM RAILROAD PAC) | | | | | | | ID# C00007831 | NON-PARTY | QUALIFIED |
| CSX CORPORATION | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 4MAR93 | | 93FEC/835/5309 |
| 1994 JULY MONTHLY | | | 500 | | | | 29JUN94 | | 94FEC/906/2534 |
| CWA-COPE POLITICAL CONTRIBUTIONS COMMITTEE | | | | | | | ID# C00002089 | NON-PARTY | QUALIFIED |
| COMMUNICATIONS WORKERS OF AMERICA | | | | | | | | | |
| 1994 SEPTEMBER MONTHLY | | | 5,000 | | | | 25AUG94 | | 94FEC/921/3217 |
| DEALERS ELECTION ACTION COMMITTEE OF THE NATIONAL AUTOMOBILE DEALERS ASSOCIATION (NADA) | | | | | | | ID# C00040998 | NON-PARTY | QUALIFIED |
| AUTOMOBILE DEALERS ASS'N; NAT'L | | | | | | | | | |
| 1993 SEPTEMBER MONTHLY | | | 2,000 | | | | 9AUG93 | | 93FEC/860/3188 |

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| | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| NOVEMBER MONTHLY | | 500 | | | | 21OCT93 | | 93FEC/867/4088 |
| 1994 APRIL MONTHLY | | 500 | | | | 21MAR94 | | 94FEC/890/5499 |
| JULY MONTHLY | | 2,000 | | | | 22JUN94 | | 94FEC/913/3599 |
| PRE-GENERAL | | 1,000 | | | | 12OCT94 | | 94FEC/944/3488 |
| DELOITTE & TOUCHE FEDERAL POLITICAL ACTION COMMITTEE (AKA-TOUCHE ROSS PARTNERS FED PAC) | | | | | | ID# C00211318 | NON-PARTY | QUALIFIED |
| AFFL-DELOITTE HASKINS & SELLS GD GOVT | | | | | | | | |
| 1994 OCTOBER MONTHLY | | 1,500 | | | | 23SEP94 | | 94FEC/932/5318 |
| DELTA DENTAL PLANS ASSOCIATION PAC (DELTAPAC) | | | | | | ID# C00213819 | NON-PARTY | QUALIFIED |
| DELTA DENTAL PLANS ASSN | | | | | | | | |
| 1994 APRIL QUARTERLY | | 500 | | | | 14MAR94 | | 94FEC/894/1361 |
| PRE-GENERAL | | 500 | | | | 10CT94 | | 94FEC/939/0337 |
| DEMOCRATIC REPUBLICAN INDEPENDENT VOTER EDUCATION COMMITTEE | | | | | | ID# C00032979 | NON-PARTY | QUALIFIED |
| TEAMSTERS: INT'L BROTHERHOOD OF | | | | | | | | |
| 1993 NOVEMBER MONTHLY | | 2,500 | | | | 28OCT93 | | 93FEC/867/0904 |
| 1994 JUNE MONTHLY | | 2,500 | | | | 2MAY94 | | 94FEC/903/3068 |
| JULY MONTHLY | | 5,000 | | | | 28JUN94 | | 94FEC/913/1751 |
| DETROIT EDISON POLITICAL ACTION COMMITTEE-EDPAC-FEDERAL | | | | | | ID# C00081547 | NON-PARTY | QUALIFIED |
| DETROIT EDISON COMPANY | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | 500 | | | | 30SEP94 | | 94FEC/928/1794 |
| DEVRY INC POLITICAL ACTION COMMITTEE | | | | | | ID# C00198606 | NON-PARTY | QUALIFIED |
| KELLER GRADUATE SCHOOL OF MNGMT INC | | | | | | | | |
| 1994 POST-GENERAL | | 100 | | | | 31OCT94 | | 94FEC/949/5184 |
| DISTRICT NO 1-MEBA/NMU (AFL-CIO) POLITICAL ACTION FUND | | | | | | ID# C00002022 | NON-PARTY | QUALIFIED |
| DISTRICT NO 1-MEBA/NMU (AFL-CIO) | | | | | | | | |
| 1993 APRIL MONTHLY | | 2,000 | | | | 29MAR93 | | 93FEC/835/5471 |
| EFFECTIVE GOVERNMENT COMMITTEE | | | | | | ID# C00190876 | NON-PARTY | QUALIFIED |
| NONE | | | | | | | | |
| 1994 SEPTEMBER MONTHLY | | 1,000 | | | | 14AUG94 | | 94FEC/923/0458 |
| PRE-GENERAL | | 1,500 | | | | 18OCT94 | | 94FEC/939/4516 |
| EMPLOYEES FEDERAL PAC - CAROLINA POWER & LIGHT CO | | | | | | ID# C00091884 | NON-PARTY | QUALIFIED |
| CAROLINA POWER & LIGHT CO | | | | | | | | |
| 1993 JUNE MONTHLY | | 500 | | | | 6MAY93 | | 93FEC/842/2229 |
| 1994 POST-GENERAL | | 500 | | | | 28OCT94 | | 94FEC/951/2524 |
| ENGINEERS POLITICAL EDUCATION COMMITTEE (EPEC)/INTERNATIONAL UNION OF OPERATING ENGINEERS | | | | | | ID# C00029504 | NON-PARTY | QUALIFIED |
| ENGINEERS: INT'L UNION OF OPERATING | | | | | | | | |
| 1993 YEAR-END | | 500 | | | | 16DEC93 | | 94FEC/879/5192 |
| 1994 AUGUST MONTHLY | | 100 | | | | 15JUL94 | | 94FEC/918/1925 |
| PRE-GENERAL | | 125 | | | | 19OCT94 | | 94FEC/937/1140 |
| ENTERGY SERVICES, INC. GOOD GOVERNMENT ACTION COMMITTEE (SERVAC) | | | | | | ID# C00100727 | NON-PARTY | QUALIFIED |
| ENTERGY CORPORATION | | | | | | | | |
| 1993 MID-YEAR REPORT | | 350 | | | | 20APR93 | | 93FEC/852/4279 |
| 1994 POST-GENERAL | | 500 | | | | 28OCT94 | | 94FEC/950/2083 |
| ERNST & YOUNG POLITICAL ACTION COMMITTEE | | | | | | ID# C00227744 | NON-PARTY | QUALIFIED |
| NONE | | | | | | | | |
| 1994 JUNE MONTHLY | | 1,000 | | | | 24MAY94 | | 94FEC/902/5474 |
| OCTOBER MONTHLY | | 1,000 | | | | 27SEP94 | | 94FEC/931/4190 |

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| FARM CREDIT POLITICAL ACTION COMMITTEE | | | | | | | ID# C00193631 NON-PARTY QUALIFIED | | |
| FARM CREDIT COUNCIL | | | | | | | | | |
| 1994 AUGUST MONTHLY | | | 250 | | | | 6JUL94 | | 94FEC/918/1783 |
| FEDERAL CITIZENSHIP RESPONSIBILITY GROUP OF THE EMPLOYEES OF SOUTHERN CALIFORNIA EDISON CO | | | | | | | ID# C00019653 NON-PARTY QUALIFIED | | |
| SOUTHERN CALIFORNIA EDISON CO | | | | | | | | | |
| 1993 POST-RUN-OFF | | | 350 | | | | 14APR93 | | 93FEC/844/2687 |
| 1994 APRIL MONTHLY | | | 500 | | | | 8MAR94 | | 94FEC/896/3783 |
| FEDERAL DUQUESNE LIGHT POLITICAL ACTION COMMITTEE (FEDUPAC) | | | | | | | ID# C00164244 NON-PARTY QUALIFIED | | |
| DUQUESNE LIGHT COMPANY | | | | | | | | | |
| 1994 PRE-GENERAL | | | 500 | | | | 17OCT94 | | 94FEC/934/1563 |
| FIRE FIGHTERS INTERESTED IN REGISTRATION AND EDUCATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C70002738 COMMUNICATIONS | | |
| 1994 POST-GENERAL | | | | | 22 | IND EXP | 21OCT94 | | 94FEC/947/5473 |
| FORD MOTOR COMPANY CIVIC ACTION FUND | | | | | | | ID# C00046474 NON-PARTY QUALIFIED | | |
| FORD MOTOR CO (AFF/1ST NATIONWIDE PAC) | | | | | | | | | |
| 1993 JUNE MONTHLY | | | 500 | | | | 25MAY93 | | 93FEC/842/4895 |
| NOVEMBER MONTHLY | | | 500 | | | | 22OCT93 | | 93FEC/866/2299 |
| 1994 APRIL MONTHLY | | | 500 | | | | 25MAR94 | | 94FEC/894/2087 |
| JULY MONTHLY | | | 500 | | | | 30JUN94 | | 94FEC/910/5198 |
| OCTOBER MONTHLY | | | 350 | | | | 19SEP94 | | 94FEC/928/0924 |
| FPL PAC (FORMERLY GOOD GOVERNMENT MANAGEMENT) | | | | | | | ID# C00064774 NON-PARTY QUALIFIED | | |
| FLORIDA POWER & LIGHT CO | | | | | | | | | |
| 1993 JULY MONTHLY | | | 250 | | | | 21JUN93 | | 93FEC/868/4101 |
| GAF POLITICAL ACTION COMMITTEE | | | | | | | ID# C00205500 NON-PARTY QUALIFIED | | |
| GAF CORPORATION | | | | | | | | | |
| 1994 POST-GENERAL | | | 500 | | | | 31OCT94 | | 94FEC/953/0676 |
| GAS EMPLOYEES POLITICAL ACTION COMMITTEE | | | | | | | ID# C00007450 NON-PARTY QUALIFIED | | |
| GAS ASSN: AMERICAN | | | | | | | | | |
| 1994 AUGUST MONTHLY | | | 500 | | | | 22JUL94 | | 94FEC/917/5456 |
| GENENTECH INC POLITICAL ACTION COMMITTEE (GENENPAC) | | | | | | | ID# C00199257 NON-PARTY QUALIFIED | | |
| GENENTECH INC | | | | | | | | | |
| 1994 POST-GENERAL | | | 500 | | | | 4NOV94 | | 94FEC/953/0728 |
| GENERAL ELECTRIC COMPANY POLITICAL ACTION COMMITTEE | | | | | | | ID# C00024869 NON-PARTY QUALIFIED | | |
| GENERAL ELECTRIC CO (AFF) GELCO CORP | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 15MAR93 | | 93FEC/835/0475 |
| GENERAL PUBLIC UTILITIES POWER POLITICAL ACTION COMMITTEE (GPU POWER PAC) | | | | | | | ID# C00130575 NON-PARTY QUALIFIED | | |
| GENERAL PUBLIC UTILITES CORPORATION | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 16MAR93 | | 93FEC/835/0259 |
| MAY MONTHLY | | | 500 | | | | 30APR93 | | 93FEC/839/0400 |
| 1994 APRIL MONTHLY | | | 500 | | | | 15MAR94 | | 94FEC/895/1688 |
| JULY MONTHLY | | | 500 | | | | 2JUN94 | | 94FEC/913/0993 |
| PRE-GENERAL | | | 500 | | | | 5OCT94 | | 94FEC/938/4001 |
| PRE-GENERAL | | | 125 | | | | 6OCT94 | | 94FEC/938/4001 |
| PRE-GENERAL | | | 164 | | | | 17OCT94 | | 94FEC/938/4002 |
| GLAXO INC POLITICAL ACTION COMMITTEE | | | | | | | ID# C00199703 NON-PARTY QUALIFIED | | |
| GLAXO INC | | | | | | | | | |
| 1994 MAY MONTHLY | | | 500 | | | | 11APR94 | | 94FEC/900/1053 |

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| GRAND TRUNK RAIL PAC | | | | | | | ID# C00095117 NON-PARTY QUALIFIED | | |
| GRAND TRUNK WESTERN RAILROAD, INC | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 250 | | | | 19APR93 | | 93FEC/850/5301 |
| GREENVOTE | | | | | | | ID# C00243691 NON-PARTY QUALIFIED | | |
| NONE | | | | | | | | | |
| 1994 POST-GENERAL | | | 250 | | | | 1NOV94 | | 94FEC/945/1132 |
| HEALTH INDUSTRY MANUFACTURERS ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00113621 NON-PARTY QUALIFIED | | |
| HEALTH INDUSTRY MANUFACTURERS ASS'N | | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | | 500 | | | | 16SEP94 | | 94FEC/927/1888 |
| HERCULES INCORPORATED VOLUNTARY NONPARTISAN POLITICAL CONTRIBUTIONS CMTE (HERCULES PCC) | | | | | | | ID# C00059287 NON-PARTY QUALIFIED | | |
| HERCULES INCORPORATED | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 29MAR93 | | 93FEC/848/3210 |
| HOFFMANN-LA ROCHE INC GOOD GOVERNMENT COMMITTEE | | | | | | | ID# C00078709 NON-PARTY QUALIFIED | | |
| HOFFMANN-LA ROCHE INC | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 16MAR93 | | 93FEC/853/1080 |
| 1994 APRIL QUARTERLY | | | 500 | | | | 15MAR94 | | 94FEC/895/2091 |
| HOTEL EMPLOYEES & RESTAURANT EMPLOYEES INT'L UNION T I P - "TO INSURE PROGRESS" | | | | | | | ID# C00004515 NON-PARTY QUALIFIED | | |
| HOTEL RESTAURANT EMP'S & BARTNDR'S | | | | | | | | | |
| 1994 APRIL MONTHLY | | | 500 | | | | 24MAR94 | | 94FEC/895/5033 |
| HS POLITICAL FUND | | | | | | | ID# C00105338 NON-PARTY QUALIFIED | | |
| NONE | | | | | | | | | |
| 1993 PRE-RUN-OFF | | | 250 | | | | 22MAR93 | | 93FEC/848/3934 |
| 1994 POST-GENERAL | | | 250 | | | | 31OCT94 | | 94FEC/950/4505 |
| HUMAN RIGHTS CAMPAIGN FUND POLITICAL ACTION COMMITTEE | | | | | | | ID# C00235953 NON-PARTY QUALIFIED | | |
| HUMAN RIGHTS CAMPAIGN FUND | | | | | | | | | |
| 1994 JULY MONTHLY | | | 1,000 | | | | 30JUN94 | | 94FEC/913/5502 |
| OCTOBER MONTHLY | | | 2,000 | | | | 29SEP94 | | 94FEC/935/0651 |
| DECEMBER MONTHLY | | | 1,000 | | | | 1NOV94 | | 94FEC/952/0510 |
| INDEPENDENT BANKERS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (IBAA PAC) | | | | | | | ID# C00032698 NON-PARTY QUALIFIED | | |
| BANKERS ASS'N OF AMERICA: INDEPENDENT | | | | | | | | | |
| 1994 OCTOBER MONTHLY | | | 500 | | | | 23SEP94 | | 94FEC/934/3432 |
| INDEPENDENT INSURANCE AGENTS OF AMERICA INC POLITICAL ACTION COMMITTEE (INSURPAC) | | | | | | | ID# C00002543 NON-PARTY QUALIFIED | | |
| INSURANCE AGENTS OF AMERICA: INDEPNDNT | | | | | | | | | |
| 1993 NOVEMBER MONTHLY | | | 500 | | | | 4OCT93 | | 93FEC/866/2762 |
| 1994 APRIL MONTHLY | | | 500 | | | | 4MAR94 | | 94FEC/894/3950 |
| MAY MONTHLY | | | 250 | | | | 4APR94 | | 94FEC/900/0698 |
| JUNE MONTHLY | | | 1,000 | | | | 27MAY94 | | 94FEC/903/2784 |
| AUGUST MONTHLY | | | 250 | | | | 1JUL94 | | 94FEC/917/2963 |
| SEPTEMBER MONTHLY | | | 350 | | | | 12AUG94 | | 94FEC/923/4713 |
| SEPTEMBER MONTHLY | | | 500 | | | | 29AUG94 | | 94FEC/923/4712 |
| POST-GENERAL | | | 500 | | | | 26OCT94 | | 94FEC/949/3633 |
| INTERNATIONAL ASSOCIATION OF FIREFIGHTERS INTERESTED IN REGISTRATION AND EDUCATION PAC | | | | | | | ID# C00029447 NON-PARTY QUALIFIED | | |
| FIRE FIGHTERS: INTERNATIONAL ASS'N OF | | | | | | | | | |
| 1994 JUNE MONTHLY | | | 1,000 | | | | 13MAY94 | | 94FEC/902/5282 |
| PRE-GENERAL | | | 1,000 | | | | 11OCT94 | | 94FEC/938/0711 |
| INTERNATIONAL ASSOCIATION OF HEAT & FROST INSULATORS AND ASBESTOS WORKERS P A C | | | | | | | ID# C00115527 NON-PARTY QUALIFIED | | |

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| ASBESTOS WRKRS: INT'L ASS'N-HEAT&FROST | | | | | | | | | |
| 1994 JULY QUARTERLY | | | 1,000 | | | | 17JUN94 | | 94FEC/908/0789 |
| INTERNATIONAL BROTHERHOOD OF BOILERMAKERS, IN SF BLDRS, BKMTHS, FRGRS & HLPRS-LEG ED..FUNDID# C00005157 NON-PARTY QUALIFIED | | | | | | | | | |
| BOILERMAKERS-BLAKSMITHS: INT'L BRTHD | | | | | | | | | |
| 1994 JULY QUARTERLY | | | 1,000 | | | | 29JUN94 | | 94FEC/910/0157 |
| INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS COMMITTEE ON POLITICAL EDUCATION ID# C00027342 NON-PARTY QUALIFIED | | | | | | | | | |
| ELECTRICAL WORKERS: INT'L BROTH'D OF | | | | | | | | | |
| OCTOBER MONTHLY | | | 1,000- | | | | 25JUN90 | | 94FEC/931/1310 |
| 1993 APRIL MONTHLY | | | 1,000 | | | | 8MAR93 | | 93FEC/834/3038 |
| 1994 APRIL MONTHLY | | | 500 | | | | 8MAR94 | | 94FEC/889/4993 |
| AUGUST MONTHLY | | | 2,500 | | | | 29JUL94 | | 94FEC/917/0859 |
| OCTOBER MONTHLY | | | 100 | | | | 16SEP94 | | 94FEC/931/1309 |
| POST-GENERAL | | | 1,000 | | | | 4NOV94 | | 94FEC/946/5811 |
| INTERNATIONAL FEDERATION/PROFESSIONAL & TECH ENG LEG ED ACTION PROGRAM-PAC (LEAP-PAC) ID# C00164309 NON-PARTY QUALIFIED | | | | | | | | | |
| ENGINEERS: INT'L FED/PROF & TECHNICAL | | | | | | | | | |
| 1993 YEAR-END | | | 150 | | | | 4AUG93 | | 94FEC/875/0917 |
| YEAR-END | | | 150 | | | | 21OCT93 | | 94FEC/875/0918 |
| 1994 PRE-GENERAL | | | 100 | | | | 6JUL94 | | 94FEC/935/1846 |
| INTERNATIONAL LADIES GARMENT WORKERS UNION CAMPAIGN COMMITTEE ID# C00004861 NON-PARTY QUALIFIED | | | | | | | | | |
| LADIES GARMENT WORKERS' UNION: INT'L | | | | | | | | | |
| 1994 AUGUST MONTHLY | | | 1,000 | | | | 28JUL94 | | 94FEC/913/2998 |
| POST-GENERAL | | | 1,000 | | | | 3NOV94 | | 94FEC/945/3774 |
| INTERNATIONAL LONGSHOREMEN'S ASSOCIATION AFL-CIO COMMITTEE ON POLITICAL EDUCATION ILA-COPE ID# C00158578 NON-PARTY QUALIFIED | | | | | | | | | |
| INT'L LONGSHOREMEN'S ASSOC. ALF-CIO | | | | | | | | | |
| 1994 POST-GENERAL | | | 1,500 | | | | 8NOV94 | | 94FEC/953/1611 |
| INTERNATIONAL UNION OF BRICKLAYERS AND ALLIED CRAFTSMEN POLITICAL ACTION COMMITTEE ID# C00003632 NON-PARTY QUALIFIED | | | | | | | | | |
| BRICKLAYERS & ALLIED CRAFTSMEN | | | | | | | | | |
| 1993 YEAR-END | | | 500 | | | | 4NOV93 | | 94FEC/874/4600 |
| 1994 APRIL MONTHLY | | | 1,000 | | | | 1MAR94 | | 94FEC/896/4920 |
| POST-GENERAL | | | 500 | | | | 2NOV94 | | 94FEC/946/3569 |
| INTERNATIONAL UNION OF OPERATING ENGINEERS LO 825 POLITICAL ACTION AND EDUCATION COMMITTEE ID# C00017194 NON-PARTY QUALIFIED | | | | | | | | | |
| ENGINEERS: INT'L UNION OF OPERATING | | | | | | | | | |
| 1994 POST-GENERAL | | | 1,000 | | | | 28OCT94 | | 94FEC/946/0369 |
| INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 68 POLITICAL ACTION COMMITTEE ID# C00138966 NON-PARTY QUALIFIED | | | | | | | | | |
| ENGINEERS: INT'L UNION OF OPERATING | | | | | | | | | |
| 1994 PRE-PRIMARY | | | 500 | | | | 8APR94 | | 94FEC/901/1852 |
| OCTOBER QUARTERLY | | | 2,000 | | | | 25SEP94 | | 94FEC/930/4639 |
| POST-GENERAL | | | 1,000 | | | | 26OCT94 | | 94FEC/952/2704 |
| IRONWORKERS POLITICAL ACTION LEAGUE ID# C00027359 NON-PARTY QUALIFIED | | | | | | | | | |
| IRON WORKERS: INT'L ASS'N OF BRIDGE... | | | | | | | | | |
| 1994 APRIL MONTHLY | | | 1,000 | | | | 29MAR94 | | 94FEC/899/4075 |
| JULY MONTHLY | | | 1,000 | | | | 4JUN94 | | 94FEC/913/3619 |
| JULY MONTHLY | | | 1,000 | | | | 22JUN94 | | 94FEC/913/3820 |
| SEPTEMBER MONTHLY | | | 700 | | | | 26AUG94 | | 94FEC/923/0764 |
| POST-GENERAL | | | 1,000 | | | | 2NOV94 | | 94FEC/947/5319 |
| IRVINE COMPANY EMPLOYEES' POLITICAL ACTION COMMITTEE, THE ID# C00131615 NON-PARTY QUALIFIED | | | | | | | | | |

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| IRVINE COMPANY | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 10MAR93 | | 93FEC/852/3965 |
| ISRI POLITICAL ACTION COMMITTEE (FKA INSTITUTE OF SCRAP IRON & STEEL PAC) | | | | | | | ID# C00046086 | NON-PARTY QUALIFIED | |
| INSTITUTE/SCRAP RECYCLING INDUSTRIES | | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | | 500 | | | | 14SEP94 | | 94FEC/928/5030 |
| PRE-GENERAL | | | 500 | | | | 17OCT94 | | 94FEC/936/3182 |
| ITALIAN AMERICAN DEMOCRATIC LEADERSHIP COUNCIL | | | | | | | ID# C00299394 | NON-PARTY NON-QUALIFIED | |
| 1994 OCTOBER QUARTERLY | | | 500 | | | | 15AUG94 | | 95FEC/962/0134 |
| JOHNSON & JOHNSON EMPLOYEES' GOOD GOVERNMENT FUND | | | | | | | ID# C00010983 | NON-PARTY QUALIFIED | |
| JOHNSON AND JOHNSON | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 9MAR93 | | 93FEC/834/0451 |
| NOVEMBER MONTHLY | | | 500 | | | | 22OCT93 | | 93FEC/866/2936 |
| 1994 OCTOBER MONTHLY | | | 700 | | | | 13SEP94 | | 94FEC/934/4256 |
| KIDSPAC | | | | | | | ID# C00147975 | NON-PARTY QUALIFIED | |
| NONE | | | | | | | | | |
| 1994 PRE-GENERAL | | | 1,000 | | | | 7OCT94 | | 94FEC/938/4613 |
| KUTAK ROCK POLITICAL ACTION COMMITTEE | | | | | | | ID# C00160986 | NON-PARTY QUALIFIED | |
| KUTAK ROCK | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 16MAR93 | | 93FEC/855/3345 |
| LABORERS' POLITICAL LEAGUE | | | | | | | ID# C00007922 | NON-PARTY QUALIFIED | |
| LABORERS' INT'L UNION OF NORTH AMERICA | | | | | | | | | |
| 1993 MARCH MONTHLY | | | 500 | | | | 24FEB93 | | 93FEC/832/1214 |
| OCTOBER MONTHLY | | | 500 | | | | 21SEP93 | | 93FEC/866/4325 |
| 1994 JUNE MONTHLY | | | 1,000 | | | | 26MAY94 | | 94FEC/903/4774 |
| AUGUST MONTHLY | | | 1,000 | | | | 11JUL94 | | 94FEC/918/1968 |
| AUGUST MONTHLY | | | 2,000 | | | | 16JUL94 | | 94FEC/918/1969 |
| PRE-GENERAL | | | 2,000 | | | | 30OCT94 | | 94FEC/939/4765 |
| LEAGUE OF CONSERVATION VOTERS INC POLITICAL ACTION COMMITTEE (LCV EARTH FUND) | | | | | | | ID# C00252940 | NON-PARTY QUALIFIED | |
| LEAGUE OF CONSERVATION VOTERS INC | | | | | | | | | |
| APRIL MONTHLY | | | 57- | | | | 19NOV92 | | 94FEC/896/2891 |
| 1993 FEBRUARY MONTHLY | | | 0 | | | | 22JAN93 | | 93FEC/829/3831 |
| NOVEMBER MONTHLY | | | 500 | | | | 18OCT93 | | 93FEC/867/2506 |
| 1994 APRIL MONTHLY | | | 500 | | | | 18MAR94 | | 94FEC/896/2890 |
| JUNE MONTHLY | | | 3,000 | | | | 27MAY94 | | 94FEC/904/1910 |
| JULY MONTHLY | | | 1,500 | | | | 27JUN94 | | 94FEC/913/2558 |
| SEPTEMBER MONTHLY | | | 320 | | | | 15AUG94 | | 94FEC/923/0582 |
| SEPTEMBER MONTHLY | | | 780 | | | | 31AUG94 | | 94FEC/923/0583 |
| SEPTEMBER MONTHLY | | | 400 | | | | 31AUG94 | | 94FEC/923/0584 |
| OCTOBER MONTHLY | | | 400 | | | | 15SEP94 | | 94FEC/934/0728 |
| OCTOBER MONTHLY | | | 400 | | | | 30SEP94 | | 94FEC/936/0738 |
| PRE-GENERAL | | | 400 | | | | 13OCT94 | | 94FEC/938/4357 |
| POST-GENERAL | | | 400 | | | | 31OCT94 | | 94FEC/949/0500 |
| POST-GENERAL | | | 293 | | | | 8NOV94 | | 94FEC/949/0502 |
| LOEWS CORPORATION/LORILLARD PUBLIC AFFAIRS COMMITTEE (LOPAC) | | | | | | | ID# C00112888 | NON-PARTY QUALIFIED | |
| LOEWS CORPORATION | | | | | | | | | |
| 1994 JULY QUARTERLY | | | 500 | | | | 7JUN94 | | 94FEC/912/3772 |

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| MACHINISTS NON-PARTISAN POLITICAL LEAGUE | | | | | | | ID# C00002469 NON-PARTY QUALIFIED | | |
| MACHINISTS & AEROSPACE WKRS: INT L... | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 11MAR93 | 93FEC/835/0526 | |
| NOVEMBER MONTHLY | | | 500 | | | | 7OCT93 | 93FEC/867/0391 | |
| YEAR-END | | | 4,000 | | | | 3DEC93 | 94FEC/874/4451 | |
| 1994 OCTOBER MONTHLY | | | 2,000 | | | | 20SEP94 | 94FEC/934/2748 | |
| MAINTENANCE OF WAY POLITICAL LEAGUE | | | | | | | ID# C00000372 NON-PARTY QUALIFIED | | |
| MAINTENANCE OF WAY EMPLOYEES | | | | | | | | | |
| 1993 PRE-SPECIAL | | | 500 | | | | 9MAR93 | 93FEC/832/1239 | |
| POST-RUN-OFF | | | 500 | | | | 21APR93 | 93FEC/839/1291 | |
| YEAR-END | | | 500 | | | | 15OCT93 | 94FEC/879/4020 | |
| 1994 APRIL QUARTERLY | | | 500 | | | | 7MAR94 | 94FEC/894/5290 | |
| APRIL QUARTERLY | | | 500 | | | | 24MAR94 | 94FEC/894/5291 | |
| PRE-PRIMARY | | | 1,000 | | | | 23AUG94 | 94FEC/920/0961 | |
| PRE-GENERAL | | | 500 | | | | 5OCT94 | 94FEC/940/2912 | |
| MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY POLITICAL ACTION COMMITTEE | | | | | | | ID# C00118943 NON-PARTY QUALIFIED | | |
| MASSACHUSETTS MUTUAL LIFE INSURANCE CO | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 15MAR93 | 93FEC/836/1774 | |
| MERCK & CO. INC POLITICAL ACTION COMMITTEE (MERCK PAC) | | | | | | | ID# C00097485 NON-PARTY QUALIFIED | | |
| DUPONT MERCK PAC | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 12MAR93 | 93FEC/851/3630 | |
| 1994 APRIL QUARTERLY | | | 500 | | | | 18MAR94 | 94FEC/891/3312 | |
| POST-GENERAL | | | 500 | | | | 1NOV94 | 94FEC/946/3892 | |
| MID-AMERICA DAIRYMEN, INC -DAIRY EDUCATIONAL POLITICAL ACTION COMMITTEE (MID-AM/DEPAC) | | | | | | | ID# C00001388 NON-PARTY QUALIFIED | | |
| DAIRYMEN INC: MID-AMERICAN | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 30MAR93 | 93FEC/835/4825 | |
| MORGAN COMPANIES POLITICAL ACTION COMMITTEE (MORGANPAC) | | | | | | | ID# C00104299 NON-PARTY QUALIFIED | | |
| J P MORGAN & CO INCORPORATED | | | | | | | | | |
| 1994 PRE-GENERAL | | | 1,500 | | | | 13OCT94 | 94FEC/938/3711 | |
| MORGAN STANLEY & CO INCORPORATED BETTER GOVERNMENT FUND | | | | | | | ID# C00067815 NON-PARTY QUALIFIED | | |
| MORGAN STANLEY & CO INCORPORATED | | | | | | | | | |
| 1994 FEBRUARY MONTHLY | | | 1,000 | | | | 6JAN94 | 94FEC/884/3121 | |
| OCTOBER MONTHLY | | | 1,000 | | | | 22SEP94 | 94FEC/933/5412 | |
| MOTION PICTURE ASSOCIATION OF AMERICA INC POLITICAL ACTION COMMITTEE | | | | | | | ID# C00139519 NON-PARTY QUALIFIED | | |
| MOTION PICTURE ASSOCIATION OF AMERICA | | | | | | | | | |
| 1994 OCTOBER MONTHLY | | | 500 | | | | 20SEP94 | 94FEC/926/3134 | |
| NANCY PELOSI FOR CONGRESS | | | | | | | ID# C00213512 HOUSE | | |
| 1994 POST-GENERAL | | | 1,000 | | | | 20OCT94 | 94HSE/563/3423 | |
| NAPUS PAC FOR POSTMASTERS (FKA POLITICAL EDUCATION FOR POSTMASTERS) | | | | | | | ID# C00100404 NON-PARTY QUALIFIED | | |
| POSTMASTERS OF USA: NAT'L ASS'N | | | | | | | | | |
| 1994 POST-GENERAL | | | 500 | | | | 20OCT94 | 94FEC/945/1462 | |
| NATIONAL ABORTION AND REPRODUCTIVE RIGHTS ACTION LEAGUE PAC | | | | | | | ID# C00079541 NON-PARTY QUALIFIED | | |
| ABORTION RIGHTS ACTION LEAGUE: NAT'L | | | | | | | | | |
| 1993 DECEMBER MONTHLY | | | 500 | | | | 1NOV93 | 93FEC/870/1836 | |
| 1994 APRIL MONTHLY | | | 1,000 | | | | 23MAR94 | 94FEC/897/1870 | |
| OCTOBER MONTHLY | | | 500 | | | | 23SEP94 | 94FEC/933/0235 | |

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| | | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| POST-GENERAL | | | 500 | | | | 4NOV94 | | 94FEC/948/0882 |
| NATIONAL ASSOCIATION OF BROADCASTERS TELEVISION AND RADIO POLITICAL ACTION COMMITTEE | | | | | | | ID# C00009985 | NON-PARTY | QUALIFIED |
| BROADCASTERS: NAT'L ASS'N OF | | | | | | | | | |
| 1994 OCTOBER MONTHLY | | | 500 | | | | 20SEP94 | | 94FEC/933/0971 |
| NATIONAL ASSOCIATION OF LIFE UNDERWRITERS POLITICAL ACTION COMMITTEE | | | | | | | ID# C00005249 | NON-PARTY | QUALIFIED |
| UNDERWRITERS: NAT'L ASS'N OF LIFE | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 15MAR93 | | 93FEC/835/4720 |
| NOVEMBER MONTHLY | | | 500 | | | | 10CT93 | | 93FEC/867/1122 |
| NOVEMBER MONTHLY | | | 500 | | | | 11OCT93 | | 93FEC/867/1126 |
| 1994 APRIL MONTHLY | | | 500 | | | | 28MAR94 | | 94FEC/895/1610 |
| JUNE MONTHLY | | | 2,000 | | | | 16MAY94 | | 94FEC/903/4921 |
| JULY MONTHLY | | | 2,000 | | | | 25JUN94 | | 94FEC/912/4734 |
| PRE-GENERAL | | | 1,000 | | | | 30CT94 | | 94FEC/938/5208 |
| NATIONAL ASSOCIATION OF PSYCHIATRIC HEALTH SYSTEMS POLITICAL ACTION COMMITTEE (NAPHS/PAC) | | | | | | | ID# C00107136 | NON-PARTY | QUALIFIED |
| HOSPITALS: NAT'L ASS'N PVT PSYCHIATRIC | | | | | | | | | |
| 1993 YEAR-END | | | 500 | | | | 21JUL93 | | 94FEC/879/2998 |
| NATIONAL ASSOCIATION OF RETAIL DRUGGISTS POLITICAL ACTION COMMITTEE (NARDPAC) | | | | | | | ID# C00030809 | NON-PARTY | QUALIFIED |
| DRUGGISTS: NAT'L ASS'N OF RETAIL | | | | | | | | | |
| 1993 DECEMBER MONTHLY | | | 1,000 | | | | 1NOV93 | | 93FEC/870/0439 |
| 1994 APRIL MONTHLY | | | 1,000 | | | | 3MAR94 | | 94FEC/896/2113 |
| APRIL MONTHLY | | | 500 | | | | 30MAR94 | | 94FEC/896/2115 |
| NATIONAL ASSOCIATION OF RETIRED FEDERAL EMPLOYEES POLITICAL ACTION COMMITTEE (NARFE-PAC) | | | | | | | ID# C00091561 | NON-PARTY | QUALIFIED |
| EMPLOYEES: NAT'L ASS'N OF FEDERAL | | | | | | | | | |
| 1994 PRE-GENERAL | | | 3,000 | | | | 12OCT94 | | 94FEC/937/0321 |
| POST-GENERAL | | | 2,000 | | | | 4NOV94 | | 94FEC/946/5180 |
| NATIONAL ASSOCIATION OF SOCIAL WORKERS POLITICAL ACTION FOR CANDIDATE ELECTION | | | | | | | ID# C00060707 | NON-PARTY | QUALIFIED |
| SOCIAL WORKERS: NAT'L ASS'N OF | | | | | | | | | |
| 1994 APRIL MONTHLY | | | 500 | | | | 28MAR94 | | 94FEC/894/1950 |
| OCTOBER MONTHLY | | | 500- | | | | 22MAR94 | | 94FEC/938/2447 |
| OCTOBER MONTHLY | | | 500 | | | | 30SEP94 | | 94FEC/938/2447 |
| NATIONAL ASSOCIATION OF WATER COMPANIES POLITICAL ACTION COMMITTEE (NAWC - PAC) | | | | | | | ID# C00075275 | NON-PARTY | QUALIFIED |
| WATER COMPANIES: NAT'L ASS'N OF | | | | | | | | | |
| 1993 NOVEMBER MONTHLY | | | 500 | | | | 7OCT93 | | 93FEC/866/0267 |
| 1994 JULY MONTHLY | | | 500 | | | | 3JUN94 | | 94FEC/907/0768 |
| POST-GENERAL | | | 500 | | | | 1NOV94 | | 94FEC/946/3493 |
| NATIONAL COMMITTEE FOR AN EFFECTIVE CONGRESS | | | | | | | ID# C00003558 | NON-PARTY | QUALIFIED |
| NONE | | | | | | | | | |
| 1993 FEBRUARY MONTHLY | | | 700 | | | | 12JAN93 | | 93FEC/829/2678 |
| FEBRUARY MONTHLY | | | 850 | | | | 12JAN93 | | 93FEC/829/2678 |
| FEBRUARY MONTHLY | | | 700 | | | | 26JAN93 | | 93FEC/829/2679 |
| FEBRUARY MONTHLY | | | 150 | | | | 26JAN93 | | 93FEC/829/2679 |
| FEBRUARY MONTHLY | | | 50 | | | | 26JAN93 | | 93FEC/829/2679 |
| FEBRUARY MONTHLY | | | 50 | | | | 26JAN93 | | 93FEC/829/2679 |
| NATIONAL COMMITTEE TO PRESERVE SOCIAL SECURITY AND MEDICARE - PAC | | | | | | | ID# C00172296 | NON-PARTY | QUALIFIED |
| NATL CMTE/PRESERVE SOC SEC & MEDICARE | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 18MAR93 | | 93FEC/850/1[illegible] |

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| YEAR-END | | | 500 | | | | 40CT93 | | 94FEC/876/2785 |
| 1994 AUGUST MONTHLY | | | 1,000 | | | | 15JUL94 | | 94FEC/917/3765 |
| OCTOBER MONTHLY | | | 1,000 | | | | 26SEP94 | | 94FEC/932/5344 |
| NATIONAL CONCRETE MASONRY ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00128975 NON-PARTY QUALIFIED | | |
| CONCRETE MASONRY ASS'N: NAT'L | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 200 | | | | 6APR93 | | 93FEC/848/0709 |
| 1994 APRIL QUARTERLY | | | 250 | | | | 4MAR94 | | 94FEC/890/4200 |
| NATIONAL COUNCIL OF SENIOR CITIZENS POLITICAL ACTION COMMITTEE | | | | | | | ID# C00166322 NON-PARTY QUALIFIED | | |
| COUNCIL OF SENIOR CITIZENS INC: NAT'L | | | | | | | | | |
| 1994 POST-GENERAL | | | 500 | | | | 24OCT94 | | 94FEC/949/0175 |
| NATIONAL EDUCATION ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00003251 NON-PARTY QUALIFIED | | |
| EDUCATION ASS'N: NAT'L | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 12MAR93 | | 93FEC/836/0715 |
| OCTOBER MONTHLY | | | 500 | | | | 24SEP93 | | 93FEC/864/1629 |
| NOVEMBER MONTHLY | | | 300 | | | | 4OCT93 | | 93FEC/867/3143 |
| 1994 APRIL MONTHLY | | | 150 | | | | 25MAR94 | | 94FEC/895/3270 |
| OCTOBER MONTHLY | | | 5,000 | | | | 13SEP94 | | 94FEC/934/1956 |
| NATIONAL EMERGENCY MEDICINE PAC OF THE AMERICAN COLLEGE OF EMERGENCY PHYSICIANS | | | | | | | ID# C00140061 NON-PARTY QUALIFIED | | |
| PHYSICIANS: AMER COLLEGE OF EMERGENCY | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 8MAR93 | | 93FEC/855/4720 |
| MID-YEAR REPORT | | | 2,000 | | | | 26MAY93 | | 93FEC/855/4717 |
| YEAR-END | | | 1,000 | | | | 20JUL93 | | 94FEC/881/4384 |
| 1994 APRIL QUARTERLY | | | 500 | | | | 28FEB94 | | 94FEC/895/2138 |
| JULY QUARTERLY | | | 1,000 | | | | 2JUN94 | | 94FEC/911/4538 |
| OCTOBER QUARTERLY | | | 200 | | | | 28JUL94 | | 94FEC/932/3660 |
| OCTOBER QUARTERLY | | | 2,000 | | | | 22SEP94 | | 94FEC/932/3669 |
| NATIONAL LEAGUE OF POSTMASTERS POLITICAL ACTION COMMITTEE | | | | | | | ID# C00164152 NON-PARTY QUALIFIED | | |
| POSTMASTERS OF US:NAT'L LEAGUE | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 25FEB93 | | 93FEC/851/3955 |
| 1994 OCTOBER QUARTERLY | | | 500 | | | | 30SEP94 | | 94FEC/928/3079 |
| NATIONAL MULTI HOUSING COUNCIL POLITICAL ACTION COMMITTEE | | | | | | | ID# C00130773 NON-PARTY QUALIFIED | | |
| MULTI HOUSING COUNCIL: NATIONAL | | | | | | | | | |
| 1993 DECEMBER MONTHLY | | | 500 | | | | 10NOV93 | | 93FEC/869/3060 |
| 1994 OCTOBER MONTHLY | | | 500 | | | | 28SEP94 | | 94FEC/931/0171 |
| NATIONAL PAC | | | | | | | ID# C00150995 NON-PARTY QUALIFIED | | |
| BLANK | | | | | | | | | |
| 1994 POST-GENERAL | | | 2,000 | | | | 28OCT94 | | 94FEC/949/4175 |
| NATIONAL RURAL LETTER CARRIERS' ASSOCIATION POLITICAL ACTION COMMITTEE | | | | | | | ID# C00072025 NON-PARTY QUALIFIED | | |
| LETTER CARRIERS ASS'N: NAT'L RURAL | | | | | | | | | |
| 1993 APRIL QUARTERLY | | | 500 | | | | 26MAR93 | | 93FEC/834/0506 |
| 1994 YEAR-END | | | 500 | | | | 12OCT94 | | 95FEC/963/2147 |
| NATIONAL SCHOOL TRANSPORTATION ASSOCIATION NON-PARTISAN TRANSPORTATION ACTION COMMITTEE | | | | | | | ID# C00179275 NON-PARTY QUALIFIED | | |
| SCHOOL TRANSPORTATION ASS'N : NAT'L | | | | | | | | | |
| 1993 YEAR-END | | | 500 | | | | 10CT93 | | 94FEC/871/4312 |
| NATIONAL TREASURY EMPLOYEES UNION POLITICAL ACTION COMMITTEE (TEPAC) | | | | | | | ID# C00107128 NON-PARTY QUALIFIED | | |
| TREASURY EMPLOYEES UNION: NATIONAL | | | | | | | | | |

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| | | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| 1994 AUGUST MONTHLY | | | 200 | | | | 14JUL94 | | 94FEC/917/2126 |
| NATIONAL UTILITY CONTRACTORS ASSN LEGISLATIVE INFORMATION & ACTION COMMITTEE | | | | | | | ID# C00004101 | NON-PARTY | QUALIFIED |
| CONTRACTORS ASS'N: NAT'L UTILITY | | | | | | | | | |
| 1994 JULY QUARTERLY | | | 500 | | | | 29JUN94 | | 94FEC/907/0658 |
| POST-GENERAL | | | 500 | | | | 31OCT94 | | 94FEC/946/3626 |
| NEW ENGLAND ELECTRIC PAC ESTABLISHED BY NEW ENGLAND POWER SERVICE COMPANY (NEEPAC) | | | | | | | ID# C00048702 | NON-PARTY | QUALIFIED |
| NEW ENGLAND POWER SERVICE COMPANY | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 350 | | | | 22APR93 | | 93FEC/854/2816 |
| NEW JERSEY BELL TELEPHONE COMPANY FEDERAL POLITICAL ACTION COMMITTEE (NJB PAC) | | | | | | | ID# C00126110 | NON-PARTY | QUALIFIED |
| BELL ATLANTIC CORPORATION | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 30MAR93 | | 93FEC/851/3563 |
| YEAR-END | | | 500 | | | | 28OCT93 | | 94FEC/873/3351 |
| 1994 APRIL QUARTERLY | | | 500 | | | | 14MAR94 | | 94FEC/891/1292 |
| NEW JERSEY MEDICAL PAC | | | | | | | ID# C00039123 | NON-PARTY | QUALIFIED |
| MEDICAL ASS N: NEW JERSEY [AMPAC] | | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | | 1,500 | | | | 29SEP94 | | 94FEC/926/3909 |
| NEW YORK LIFE INSURANCE COMPANY POLITICAL ACTION COMMITTEE | | | | | | | ID# C00158881 | NON-PARTY | QUALIFIED |
| LIFE INSURANCE CO: NEW YORK | | | | | | | | | |
| 1994 POST-GENERAL | | | 500 | | | | 4NOV94 | | 94FEC/947/4559 |
| NJ SAVINGS LEAGUE - SAFEC-NJ - SAVINGS ASSOCIATION POLITICAL ELECTION COMM - NEW JERSEY | | | | | | | ID# C00011221 | NON-PARTY | QUALIFIED |
| NEW JERSEY SAVINGS LEAGUE | | | | | | | | | |
| 1994 POST-GENERAL | | | 500 | | | | 3NOV94 | | 94FEC/953/0142 |
| NORFOLK SOUTHERN CORPORATION GOOD GOVERNMENT FUND | | | | | | | ID# C00009282 | NON-PARTY | QUALIFIED |
| NORFOLK SOUTHERN CORPORATION | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 23MAR93 | | 93FEC/833/2614 |
| 1994 PRE-GENERAL | | | 500 | | | | 7OCT94 | | 94FEC/942/5143 |
| NORTH AMERICAN VAN LINES INC PAC (NAPAC)/NORFOLK SOUTHERN CORP GOOD GOVERNMENT FUND | | | | | | | ID# C00193581 | NON-PARTY | QUALIFIED |
| NORFOLK SOUTHERN CORP GOOD GOVT FUND | | | | | | | | | |
| 1993 NOVEMBER MONTHLY | | | 500 | | | | 10CT93 | | 93FEC/866/5059 |
| NORTH JERSEY PAC | | | | | | | ID# C00247463 | NON-PARTY | QUALIFIED |
| NONE | | | | | | | | | |
| 1994 AUGUST MONTHLY | | | 250 | | | | 19JUL94 | | 94FEC/917/3115 |
| NORTHERN STATES POWER EMPLOYEE POLITICAL INTEREST COMMITTEE | | | | | | | ID# C00107771 | NON-PARTY | QUALIFIED |
| NORTHERN STATES POWER COMPANY | | | | | | | | | |
| 1994 PRE-GENERAL | | | 250 | | | | 30OCT94 | | 94FEC/940/1637 |
| NUTRITIONAL HEALTH POLITICAL ACTION COMMITTEE | | | | | | | ID# C00276626 | NON-PARTY | NON-QUALIFIED |
| NONE | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 2MAR93 | | 93FEC/854/2043 |
| 1994 APRIL QUARTERLY | | | 250 | | | | 29MAR94 | | 94FEC/891/5460 |
| OCTOBER QUARTERLY | | | 250 | | | | 20SEP94 | | 94FEC/929/1976 |
| OCEAN SPRAY CRANBERRIES INC POLITICAL ACTION COMMITTEE | | | | | | | ID# C00114702 | NON-PARTY | QUALIFIED |
| OCEAN SPRAY CRANBERRIES INC | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 2MAR93 | | 93FEC/855/0054 |
| OGDEN CORPORATION POLITICAL ACTION FUND | | | | | | | ID# C00142158 | NON-PARTY | QUALIFIED |
| OGDEN CORPORATION | | | | | | | | | |
| 1994 APRIL QUARTERLY | | | 500 | | | | 23MAR94 | | 94FEC/889/3465 |

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| | | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| OCTOBER QUARTERLY | | | 1,000 | | | | 22SEP94 | | 94FEC/925/1988 |
| OIL, CHEMICAL & ATOMIC WORKERS INTERNATIONAL UNION CMTE ON POLITICAL EDUC FUND (OCAW-COPE) | | | | | | | ID# C00030635 NON-PARTY QUALIFIED | | |
| OIL CHEMICAL & ATOMIC WKRS INT'L UNION | | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | | 500 | | | | 19JUL94 | | 94FEC/930/1851 |
| OPPENHEIMER FEDERAL POLITICAL FUND | | | | | | | ID# C00160515 NON-PARTY QUALIFIED | | |
| OPPENHEIMER,WOLFF,FOSTER,SHEPARD&DONNE | | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | | 1,000 | | | | 18JUL94 | | 94FEC/933/5396 |
| PACIFIC GAS AND ELECTRIC COMPANY EMPLOYEES FEDERAL POLITICAL ACTION COMMITTEE | | | | | | | ID# C00177469 NON-PARTY QUALIFIED | | |
| PG&E EMPLOYEES' FED GOOD GOV'T FUND | | | | | | | | | |
| 1994 PRE-GENERAL | | | 500 | | | | 7OCT94 | | 94FEC/940/2653 |
| PACIFIC TELESIS GROUP POLITICAL ACTION COMMITTEE (FEDERAL ACCOUNT) | | | | | | | ID# C00083865 NON-PARTY QUALIFIED | | |
| PACIFIC TELESIS GROUP | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 26MAR93 | | 93FEC/836/4952 |
| 1994 APRIL MONTHLY | | | 500 | | | | 22MAR94 | | 94FEC/897/0562 |
| POST-GENERAL | | | 500 | | | | 2NOV94 | | 94FEC/950/4855 |
| PARSONS BRINCKERHOFF INC PAC | | | | | | | ID# C00267003 NON-PARTY QUALIFIED | | |
| PARSONS BRINCKERHOFF INC | | | | | | | | | |
| 1994 PRE-PRIMARY | | | 500 | | | | 7JUL94 | | 94FEC/920/1660 |
| PARTICIPATION 2000 INC | | | | | | | ID# C00221387 NON-PARTY QUALIFIED | | |
| NONE | | | | | | | | | |
| 1993 PRE-SPECIAL | | | 100 | | | | 28JAN93 | | 93FEC/835/2276 |
| 1994 OCTOBER QUARTERLY | | | 500 | | | | 15SEP94 | | 94FEC/927/8479 |
| PRE-GENERAL | | | 500 | | | | 19OCT94 | | 94FEC/937/0364 |
| POST-GENERAL | | | 250 | | | | 3NOV94 | | 94FEC/948/1005 |
| POST-GENERAL | | | 250 | | | | 4NOV94 | | 94FEC/948/1005 |
| PEAT MARWICK PARTNERS/PRINCIPALS & EMPLOYEES POLITICAL ACTION COMMITTEE (PEAT MARWICK/PAC) | | | | | | | ID# C00080222 NON-PARTY QUALIFIED | | |
| BLANK | | | | | | | | | |
| 1994 OCTOBER MONTHLY | | | 1,000 | | | | 16SEP94 | | 94FEC/933/5132 |
| PENNSYLVANIA POWER & LIGHT CO PEOPLE FOR GOOD GOVERNMENT | | | | | | | ID# C00028106 NON-PARTY QUALIFIED | | |
| PENNSYLVANIA POWER & LIGHT CO | | | | | | | | | |
| 1994 PRE-GENERAL | | | 500 | | | | 18OCT94 | | 94FEC/937/3169 |
| PETROLEUM MARKETERS ASSOCIATION OF AMERICA SMALL BUSINESSMEN'S COMMITTEE | | | | | | | ID# C00035204 NON-PARTY QUALIFIED | | |
| PETROLEUM MARKETERS ASS'N OF AMERICA | | | | | | | | | |
| 1993 DECEMBER MONTHLY | | | 500 | | | | 30NOV93 | | 93FEC/870/3967 |
| 1994 APRIL MONTHLY | | | 500 | | | | 11MAR94 | | 94FEC/897/0852 |
| OCTOBER MONTHLY | | | 500 | | | | 2SEP94 | | 94FEC/937/3915 |
| PFIZER PAC | | | | | | | ID# C00016683 NON-PARTY QUALIFIED | | |
| PFIZER INC | | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | | 350 | | | | 19SEP94 | | 94FEC/930/3506 |
| PLUMBERS & PIPEFITTERS LOCAL NO 9 POLITICAL ACTION COMMITTEE | | | | | | | ID# C00155440 NON-PARTY QUALIFIED | | |
| PLUMBING & PIPEFITTING INDUSTRY | | | | | | | | | |
| 1993 YEAR-END | | | 300 | | | | 17AUG93 | | 94FEC/873/2844 |
| YEAR-END | | | 150 | | | | 30SEP93 | | 94FEC/873/2846 |
| 1994 APRIL QUARTERLY | | | 300 | | | | 1MAR94 | | 94FEC/895/3959 |
| APRIL QUARTERLY | | | 500 | | | | 21MAR94 | | 94FEC/895/3959 |
| APRIL QUARTERLY | | | 300 | | | | 21MAR94 | | 94FEC/895/3960 |

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| POST-GENERAL | | 3,000 | | | | 22NOV94 | | 94FEC/944/4421 |
| YEAR-END | | 3,000 | | | | 22NOV94 | | 95FEC/956/3842 |
| PODIATRY POLITICAL ACTION COMMITTEE | | | | | | ID# C00008839 NON-PARTY QUALIFIED | | |
| PODIATRY ASS N: AMERICAN | | | | | | | | |
| 1993 APRIL MONTHLY | | 1,000 | | | | 5MAR93 | | 93FEC/834/4218 |
| AUGUST MONTHLY | | 1,000 | | | | 16JUL93 | | 93FEC/857/5059 |
| OCTOBER MONTHLY | | 1,000 | | | | 22SEP93 | | 93FEC/864/2424 |
| 1994 MARCH MONTHLY | | 1,000 | | | | 23FEB94 | | 94FEC/888/2043 |
| JUNE MONTHLY | | 2,000 | | | | 20MAY94 | | 94FEC/902/2928 |
| POLITICAL ACTION COMMITTEE OF THE AMERICAN HOSPITAL ASSOCIATION | | | | | | ID# C00106146 NON-PARTY QUALIFIED | | |
| HOSPITAL ASSOCIATION: AMERICAN | | | | | | | | |
| 1993 APRIL MONTHLY | | 500 | | | | 12MAR93 | | 93FEC/840/4612 |
| AUGUST MONTHLY | | 500 | | | | 21JUL93 | | 93FEC/859/2706 |
| NOVEMBER MONTHLY | | 500 | | | | 13OCT93 | | 93FEC/867/3376 |
| 1994 OCTOBER MONTHLY | | 4,987 | | | | 13SEP94 | | 94FEC/934/0930 |
| OCTOBER MONTHLY | - AMENDMENT | 8,313 | | | | 13SEP94 | | 95FEC/964/4825 |
| POLITICAL ACTION COMMITTEE OF THE DUN & BRADSTREET CORPORATION | | | | | | ID# C00119669 NON-PARTY QUALIFIED | | |
| DUN & BRADSTREET CORPORATION | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | 200 | | | | 19SEP94 | | 94FEC/927/5370 |
| POLITICAL EDUCATIONAL FUND OF THE BUILDING AND CONSTRUCTION TRADES DEPARTMENT AFL-CIO | | | | | | ID# C00003160 NON-PARTY QUALIFIED | | |
| 1993 NOVEMBER MONTHLY | | 500 | | | | 10CT93 | | 93FEC/867/1029 |
| 1994 OCTOBER MONTHLY | | 500 | | | | 28SEP94 | | 94FEC/934/2586 |
| POLITICAL FUND COMMITTEE OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO | | | | | | ID# C00010322 NON-PARTY QUALIFIED | | |
| POSTAL WORKERS UNION: AMERICAN | | | | | | | | |
| 1993 MID-YEAR REPORT | | 500 | | | | 4MAR93 | | 93FEC/852/0348 |
| YEAR-END | | 500 | | | | 50CT93 | | 94FEC/876/5187 |
| 1994 OCTOBER QUARTERLY | | 2,000 | | | | 20SEP94 | | 94FEC/927/0932 |
| POTOMAC ELECTRIC POWER COMPANY POLITICAL ACTION COMMITTEE (PEPCO PAC) | | | | | | ID# C00118885 NON-PARTY QUALIFIED | | |
| POTOMAC ELECTRIC POWER COMPANY | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | 500 | | | | 27SEP94 | | 94FEC/926/0889 |
| POWER PAC OF THE EDISON ELECTRIC INSTITUTE | | | | | | ID# C00095869 NON-PARTY QUALIFIED | | |
| ELECTRIC INSTITUTE: EDISON | | | | | | | | |
| 1993 MID-YEAR REPORT | | 500 | | | | 4MAY93 | | 93FEC/850/1084 |
| 1994 PRE-GENERAL | | 500 | | | | 40CT94 | | 94FEC/937/8113 |
| PRESTON GATES ELLIS & ROUVELAS MEEDS PAC (FKA-PRESTON, THORGRIMSON, ELLIS & HOLMAN PAC) | | | | | | ID# C00213173 NON-PARTY NON-QUALIFIED | | |
| NONE | | | | | | | | |
| 1994 OCTOBER MONTHLY | | 500 | | | | 22SEP94 | | 94FEC/932/5081 |
| PRICE WATERHOUSE PARTNERS' POLITICAL ACTION COMMITTEE | | | | | | ID# C00232173 NON-PARTY QUALIFIED | | |
| NONE | | | | | | | | |
| 1993 YEAR-END | | 1,000 | | | | 17DEC93 | | 94FEC/875/3396 |
| 1994 OCTOBER QUARTERLY | | 1,500 | | | | 21SEP94 | | 94FEC/929/4373 |
| PROFESSIONALS IN ADVERTISING POLITICAL ACTION COMMITTEE | | | | | | ID# C00233353 NON-PARTY QUALIFIED | | |
| NONE | | | | | | | | |
| 1994 JULY MONTHLY | | 200 | | | | 29JUN94 | | 94FEC/907/2907 |
| PROVIDENT SAVINGS BANK POLITICAL ACTION COMMITTEE (PROVPAC) | | | | | | ID# C00229328 NON-PARTY QUALIFIED | | |

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| PROVIDENT SAVINGS BANK | | | | | | | | | |
| 1994 POST-GENERAL | | | 300 | | | | 28OCT94 | | 94FEC/954/1435 |
| PRUDENTIAL INSURANCE COMPANY OF AMERICA FEDERAL PAC ("PRUDENTIAL PAC") | | | | | | | ID# C00127779 NON-PARTY QUALIFIED | | |
| PRUDENTIAL INSURANCE CO OF AMERICA | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 500 | | | | 7APR93 | | 93FEC/854/4124 |
| 1994 JULY MONTHLY | | | 500 | | | | 30JUN94 | | 94FEC/912/4153 |
| PUBLIC SECURITIES ASSOCIATION POLITICAL ACTION CMTE | | | | | | | ID# C00158980 NON-PARTY QUALIFIED | | |
| PUBLIC SECURITIES ASSOCIATION | | | | | | | | | |
| 1994 OCTOBER MONTHLY | | | 500 | | | | 20SEP94 | | 94FEC/926/2431 |
| PUBLIC SERVICE ELECTRIC AND GAS COMPANY POLITICAL ACTION COMMITTEE (PEGPAC) | | | | | | | ID# C00214940 NON-PARTY QUALIFIED | | |
| PUBLIC SERVICE ELECTRIC AND GAS CO | | | | | | | | | |
| 1993 PRE-SPECIAL | | | 500 | | | | 15MAR93 | | 93FEC/835/1055 |
| POST-SPECIAL | | | 500 | | | | 19APR93 | | 93FEC/841/1424 |
| POST-SPECIAL | | | 312 | | | | 20APR93 | | 93FEC/841/1425 |
| YEAR-END | | | 250 | | | | 9AUG93 | | 94FEC/878/5487 |
| YEAR-END | | | 500 | | | | 24SEP93 | | 94FEC/878/5488 |
| 1994 APRIL MONTHLY | | | 500 | | | | 14MAR94 | | 94FEC/896/3577 |
| JULY MONTHLY | | | 500 | | | | 22JUN94 | | 94FEC/914/1547 |
| SEPTEMBER MONTHLY | | | 700 | | | | 24AUG94 | | 94FEC/923/4416 |
| PRE-GENERAL | | | 1,000 | | | | 13OCT94 | | 94FEC/937/3107 |
| REALTORS POLITICAL ACTION COMMITTEE | | | | | | | ID# C00030718 NON-PARTY QUALIFIED | | |
| REALTORS: NAT'L ASSOCIATION OF | | | | | | | | | |
| 1994 OCTOBER MONTHLY | | | 1,000 | | | | 8SEP94 | | 94FEC/931/2143 |
| OCTOBER MONTHLY | | | 1,000 | | | | 14SEP94 | | 94FEC/931/2144 |
| RESPONSIBLE CITIZENS POLITICAL LEAGUE-A PROJECT OF THE TRANS COMM INTL UNION(TCU)/A(BRAC) | | | | | | | ID# C00006338 NON-PARTY QUALIFIED | | |
| RAILWAY AIRLINE & STEAMSHIP CLERKS | | | | | | | | | |
| 1993 MAY MONTHLY | | | 250 | | | | 15APR93 | | 93FEC/840/1809 |
| NOVEMBER MONTHLY | | | 500 | | | | 15OCT93 | | 93FEC/867/0437 |
| 1994 APRIL MONTHLY | | | 500 | | | | 11MAR94 | | 94FEC/891/3823 |
| NOVEMBER MONTHLY | | | 500 | | | | 7OCT94 | | 94FEC/943/5275 |
| RJR POLITICAL ACTION COMMITTEE RJR NABISCO INC (RJR PAC) | | | | | | | ID# C00042002 NON-PARTY QUALIFIED | | |
| RJR NABISCO INC | | | | | | | | | |
| 1993 MAY MONTHLY | | | 500 | | | | 19APR93 | | 93FEC/838/4260 |
| DECEMBER MONTHLY | | | 500 | | | | 17NOV93 | | 93FEC/869/5140 |
| 1994 MAY MONTHLY | | | 1,000 | | | | 15APR94 | | 94FEC/898/4100 |
| SAN DIEGO GAS & ELECTRIC CO. CITIZENS FOR GOOD GOVERNMENT COMMITTEE | | | | | | | ID# C00063131 NON-PARTY QUALIFIED | | |
| SAN DIEGO GAS & ELECTRIC COMPANY | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 350 | | | | 21APR93 | | 93FEC/854/2064 |
| SANDOZ PHARMACEUTICALS CORP POLITICAL ACTION COMMITTEE | | | | | | | ID# C00111716 NON-PARTY QUALIFIED | | |
| SANDOZ INC | | | | | | | | | |
| 1993 JUNE MONTHLY | | | 150 | | | | 28MAY93 | | 93FEC/842/3218 |
| NOVEMBER MONTHLY | | | 150- | | | | 28MAY93 | | 93FEC/866/0054 |
| NOVEMBER MONTHLY | | | 500 | | | | 12OCT93 | | 93FEC/866/0054 |
| 1994 PRE-GENERAL | | | 300 | | | | 5OCT94 | | 94FEC/935/2498 |
| SCHERING - PLOUGH CORPORATION BETTER GOVERNMENT FUND | | | | | | | ID# C00108290 NON-PARTY QUALIFIED | | |
| SCHERING-PLOUGH CORPORATION | | | | | | | | | |

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| | | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| 1993 YEAR-END | | | 500 | | | | 4AUG93 | | 94FEC/876/4982 |
| SEAFARERS POLITICAL ACTIVITY DONATION (SPAD) | | | | | | | ID# C00004325 NON-PARTY QUALIFIED | | |
| SEAFARERS INT'L UNION OF NORTH AMERICA | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 1,000 | | | | 9MAR93 | | 93FEC/834/4195 |
| 1994 POST-GENERAL | | | 1,000 | | | | 20OCT94 | | 94FEC/946/1698 |
| POST-GENERAL | | | 500 | | | | 4NOV94 | | 94FEC/946/1698 |
| SERVICE EMPLOYEES INT'L UNION COMMITTEE ON POLITICAL EDUCATION POLITICAL CAMPAIGN COMM | | | | | | | ID# C00004036 NON-PARTY QUALIFIED | | |
| SERVICE EMPLOYEES INT L UNION | | | | | | | | | |
| 1994 JULY MONTHLY | | | 1,000 | | | | 29JUN94 | | 94FEC/914/0121 |
| PRE-GENERAL | | | 1,000 | | | | 30OCT94 | | 94FEC/937/0051 |
| POST-GENERAL | | | 1,500 | | | | 24OCT94 | | 94FEC/949/4746 |
| SHEET METAL WORKERS INTERNATIONAL ASSOCIATION POLITICAL ACTION LEAGUE (PAL) | | | | | | | ID# C00007542 NON-PARTY QUALIFIED | | |
| SHEET METAL WORKERS INT'L ASSOC | | | | | | | | | |
| 1994 AUGUST MONTHLY | | | 2,500 | | | | 22JUL94 | | 94FEC/917/1236 |
| SIERRA CLUB COMMITTEE ON POLITICAL EDUCATION | | | | | | | ID# C00135368 NON-PARTY QUALIFIED | | |
| SIERRA CLUB | | | | | | | | | |
| 1993 PRE-SPECIAL | | | 500 | | | | 21OCT93 | | 93FEC/868/0133 |
| POST-SPECIAL | | | 500 | | | | 25MAR93 | | 93FEC/839/0069 |
| 1994 JULY MONTHLY | | | 1,000 | | | | 2JUN94 | | 94FEC/913/2425 |
| OCTOBER MONTHLY | | | 2,000 | | | | 14SEP94 | | 94FEC/935/1204 |
| POST-GENERAL | | | 1,000 | | | | 20OCT94 | | 94FEC/948/0974 |
| SMITHKLINE BEECHAM POLITICAL ACTION COMMITTEE (SB-PAC) | | | | | | | ID# C00008926 NON-PARTY QUALIFIED | | |
| SMITHKLINE BEECHAM CORPORATION | | | | | | | | | |
| 1993 YEAR-END | | | 500 | | | | 15SEP93 | | 94FEC/876/0582 |
| 1994 OCTOBER QUARTERLY | | | 500 | | | | 14JUL94 | | 94FEC/926/5233 |
| SOUTHERN COMPANY SERVICES PAC | | | | | | | ID# C00144774 NON-PARTY QUALIFIED | | |
| SOUTHERN COMPANY | | | | | | | | | |
| 1993 MAY MONTHLY | | | 350 | | | | 19APR93 | | 93FEC/839/3258 |
| SPRINTPAC | | | | | | | ID# C00089342 NON-PARTY QUALIFIED | | |
| UNITED TELECOMMUNICATIONS INC | | | | | | | | | |
| 1994 PRE-GENERAL | | | 500 | | | | 6OCT94 | | 94FEC/935/2439 |
| STEAMFITTERS LOCAL NO 475 POLITICAL ACTION COMMITTEE | | | | | | | ID# C00252395 NON-PARTY QUALIFIED | | |
| STEAMFITTERS LOCAL NO 475 | | | | | | | | | |
| 1994 PRE-GENERAL | | | 1,000 | | | | 7OCT94 | | 94FEC/936/3816 |
| SUN COMPANY INC POLITICAL ACTION COMMITTEE | | | | | | | ID# C00025346 NON-PARTY QUALIFIED | | |
| SUN COMPANY INC | | | | | | | | | |
| 1994 OCTOBER MONTHLY | | | 500 | | | | 19SEP94 | | 94FEC/938/5069 |
| SWIDLER & BERLIN PAC | | | | | | | ID# C00165621 NON-PARTY NON-QUALIFIED | | |
| SWIDLER & BERLIN, CHARTERED | | | | | | | | | |
| 1993 MID-YEAR REPORT | | | 1,000 | | | | 18MAR93 | | 93FEC/852/1423 |
| TEAM AMERITECH POLITICAL ACTION COMMITTEE | | | | | | | ID# C00174763 NON-PARTY QUALIFIED | | |
| AMERITECH | | | | | | | | | |
| 1993 APRIL MONTHLY | | | 500 | | | | 15MAR93 | | 93FEC/835/0630 |
| 1994 PRE-GENERAL | | | 500 | | | | 7OCT94 | | 94FEC/937/1005 |
| TOBACCO INSTITUTE POLITICAL ACTION COMMITTEE | | | | | | | ID# C00009761 NON-PARTY QUALIFIED | | |
| TOBACCO INSTITUTE INC | | | | | | | | | |

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| | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| 1993 MID-YEAR REPORT | | 500 | | | | 2MAR93 | | 93FEC/851/2953 |
| TRANSPORT WORKERS UNION POLITICAL CONTRIBUTIONS COMMITTEE | | | | | | ID# C00008268 | NON-PARTY | QUALIFIED |
| TRANSPORT WORKERS UNION OF AMERICA | | | | | | | | |
| 1993 APRIL MONTHLY | | 500 | | | | 22MAR93 | | 93FEC/835/0980 |
| 1994 JULY MONTHLY | | 500 | | | | 30JUN94 | | 94FEC/912/2840 |
| PRE-GENERAL | | 3,000 | | | | 6OCT94 | | 94FEC/937/0207 |
| TRANSPORTATION POLITICAL EDUCATION LEAGUE | | | | | | ID# C00001636 | NON-PARTY | QUALIFIED |
| TRANSPORTATION UNION: UNITED | | | | | | | | |
| 1993 FEBRUARY MONTHLY | | | | 25 IND EXP | | 2JAN93 | | 93FEC/829/2502 |
| APRIL MONTHLY | | 1,000 | | | | 1MAR93 | | 93FEC/835/2548 |
| OCTOBER MONTHLY | | 1,000 | | | | 28SEP93 | | 93FEC/865/3802 |
| 1994 MARCH MONTHLY | | 2,000 | | | | 25FEB94 | | 94FEC/887/5356 |
| JULY MONTHLY | | 5,000 | | | | 27JUN94 | | 94FEC/912/4688 |
| UAW - V - CAP (UAW VOLUNTARY COMMUNITY ACTION PROGRAM) | | | | | | ID# C00002840 | NON-PARTY | QUALIFIED |
| AUTO WORKERS: UNITED | | | | | | | | |
| 1993 NOVEMBER MONTHLY | | 500 | | | | 10CT93 | | 93FEC/866/4162 |
| 1994 APRIL MONTHLY | | 500 | | | | 8MAR94 | | 94FEC/893/1304 |
| MAY MONTHLY | | 1,000 | | | | 12APR94 | | 94FEC/900/1710 |
| SEPTEMBER MONTHLY | | 5,000 | | | | 15AUG94 | | 94FEC/921/4029 |
| UNITED ASSOCIATION POLITICAL EDUCATION COMMITTEE | | | | | | ID# C00012476 | NON-PARTY | QUALIFIED |
| PLUMBING & PIPEFITTING INDUSTRY | | | | | | | | |
| 1994 PRE-GENERAL | | 1,000 | | | | 6OCT94 | | 94FEC/937/0731 |
| UNITED MINE WORKERS OF AMERICA - COAL MINERS POLITICAL ACTION COMMITTEE | | | | | | ID# C00013342 | NON-PARTY | QUALIFIED |
| MINE WORKERS OF AMERICA: UNITED | | | | | | | | |
| 1993 DECEMBER MONTHLY | | 500 | | | | 3NOV93 | | 93FEC/870/0933 |
| YEAR-END | | 500 | | | | 14DEC93 | | 94FEC/876/0833 |
| 1994 JULY MONTHLY | | 500 | | | | 27JUN94 | | 94FEC/913/0386 |
| DECEMBER MONTHLY | | 500 | | | | 3NOV94 | | 94FEC/950/4749 |
| UNITED PARCEL SERVICE POLITICAL ACTION COMMITTEE (UPSPAC) | | | | | | ID# C00004798 | NON-PARTY | QUALIFIED |
| UNITED PARCEL SERVICE OF AMERICA INC | | | | | | | | |
| 1993 NOVEMBER MONTHLY | | 300 | | | | 19OCT93 | | 93FEC/866/1052 |
| 1994 MAY MONTHLY | | 500 | | | | 6APR94 | | 94FEC/899/1143 |
| OCTOBER MONTHLY | | 1,000 | | | | 30SEP94 | | 94FEC/934/4118 |
| UNITED STATES TELEPHONE ASS'N PAC (FORMERLY-UNITED STATES INDEPENDENT TELEPHONE ASS'N PAC) | | | | | | ID# C00000884 | NON-PARTY | QUALIFIED |
| TELEPHONE ASSOCIATION: US | | | | | | | | |
| 1993 APRIL MONTHLY | | 500 | | | | 19MAR93 | | 93FEC/834/5433 |
| YEAR-END | | 250 | | | | 15DEC93 | | 94FEC/873/4136 |
| 1994 APRIL MONTHLY | | 500 | | | | 16MAR94 | | 94FEC/896/1611 |
| UNITED STEELWORKERS OF AMERICA POLITICAL ACTION FUND | | | | | | ID# C00003590 | NON-PARTY | QUALIFIED |
| STEEL WORKERS OF AMERICA: UNITED | | | | | | | | |
| 1994 AUGUST MONTHLY | | 3,000 | | | | 19JUL94 | | 94FEC/919/1634 |
| VOTERS FOR CHOICE/FRIENDS OF FAMILY PLANNING | | | | | | ID# C00109355 | NON-PARTY | QUALIFIED |
| NONE | | | | | | | | |
| 1994 JULY MONTHLY | | 1,000 | | | | 30JUN94 | | 94FEC/913/2291 |
| WARNER-LAMBERT POLITICAL ACTION COMMITTEE ("WALPAC") | | | | | | ID# C00198164 | NON-PARTY | QUALIFIED |
| WARNER-LAMBERT COMPANY | | | | | | | | |

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| 1993 APRIL MONTHLY | | | 500 | | | | 8MAR93 | | 93FEC/835/1562 |
| NOVEMBER MONTHLY | | | 500 | | | | 13OCT93 | | 93FEC/866/5082 |
| 1994 JULY MONTHLY | | | 500 | | | | 6JUN94 | | 94FEC/913/0933 |
| PRE-GENERAL | | | 500 | | | | 14OCT94 | | 94FEC/938/5485 |
| WEXLER GROUP POLITICAL ACTION COMMITTEE: THE HILL AND KNOWLTON INC | | | | | | | ID# C00248195 | NON-PARTY | NON-QUALIFIED |
| 1994 OCTOBER MONTHLY | | | 500 | | | | 22SEP94 | | 94FEC/934/0719 |
| WOMEN'S PRO-ISRAEL NATIONAL POLITICAL ACTION COMMITTEE ("WIN PAC") | | | | | | | ID# C00203182 | NON-PARTY | QUALIFIED |
| NONE | | | | | | | | | |
| 1994 POST-GENERAL | | | 500 | | | | 26OCT94 | | 94FEC/951/3226 |
| SUBTOTAL - IND EXP | | | | | 47 | | | | |
| TOTAL | | | 474,210 | | 47 | | | | |
| 6. PARTY COMMITTEE TRANSACTIONS | | | | | | | | | |
| | | | CONTRIBUTIONS TO | | EXPENDITURES ON BEHALF OF | | | | |
| DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE | | | | | | | ID# C00000935 | PARTY | QUALIFIED |
| 93 DEM SPEC ELEC FD/MAJ LEAD VIC FD | | | | | | | | | |
| 1993 MARCH MONTHLY | | | 300 | | | | 12FEB93 | | 93HSE/495/4315 |
| 1994 APRIL MONTHLY | | | 150 | | | | 10MAR94 | | 94HSE/520/3669 |
| JULY MONTHLY | | | | | 300 | | 17JUN94 | | 94HSE/534/0151 |
| OCTOBER MONTHLY | | | 5,000 | | | | 22SEP94 | | 94HSE/549/2189 |
| OCTOBER MONTHLY | | | | | 360 | | 26SEP94 | | 94HSE/549/2214 |
| PRE-GENERAL | | | | | 10,000 | | 12OCT94 | | 94HSE/552/0579 |
| POST-GENERAL | | | | | 5,000 | | 3NOV94 | | 94HSE/559/0286 |
| TOTAL | | | 5,450 | | 15,660 | | | | |
| 7. COMMUNICATION COST TRANSACTIONS | | | | | | | | | |
| | | | COMMUNICATION COSTS ON BEHALF OF | | COMMUNICATION COSTS AGAINST | | | | |
| AFL-CIO COPE POLITICAL CONTRIBUTIONS COMMITTEE | | | | | | | ID# C70000118 | COMMUNICATIONS | |
| AFL-CIO | | | | | | | | | |
| 1994 OCTOBER QUARTERLY | | | 2,028 | | | | 26SEP94 | | 94FEC/927/0899 |
| TOTAL | | | 2,028 | | 0 | | | | |
| 8. DELEGATE COMMITTEE REPORTS | | | | | | | | | |
| | | | RECEIPTS | | DISBURSEMENTS | | | | |
| 9. UNAUTHORIZED SINGLE CANDIDATE COMMITTEE REPORTS | | | | | | | | | |

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BEFORE THE FEDERAL ELECTION COMMISSION

OCT 2 10 52 AM '95

In the Matter of ) Enforcement Priority )

GENERAL COUNSEL'S REPORT

SENSITIVE

## I. INTRODUCTION

This report is the General Counsel's Report to recommend that the Commission no longer pursue the identified lower priority and stale cases under the Enforcement Priority System.

## II. CASES RECOMMENDED FOR CLOSING

### A. Cases Not Warranting Further Pursuit Relative to Other Cases Pending Before the Commission

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission-approved criteria and cases that, based on their rating, do not warrant pursuit relative to other pending cases are placed in this category. By closing such cases, the Commission is able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 34 cases which do not warrant further pursuit relative to the other pending cases.[1] A short description o'

1. These matters are: PM 309 (Attachment 1); RAD 95L-12 (Attachment 2); MUR 4118 (Attachment 3); MUR 4119 (Attachment 4); MUR 4120 (Attachment 5); MUR 4122 (Attachment 6); MUR 4123 (Attachment 7); MUR 4124 (Attachment 8); MUR 4125 (Attachment 9); MUR 4126 (Attachment 10); MUR 4130 (Attachment 11); MUR 4133 (Attachment 12); MUR 4134 (Attachment 13); MUR 4135 (Attachment 14); MUR 4136 (Attachment 15); MUR 4137

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each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-34. As the Commission requested, this Office has attached the responses to the complaints for the externally-generated matters and the referral for the matter referred by the Reports Analysis Division because this information was not previously circulated to the Commission. See Attachments 1-34.

B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 11 cases that

do not

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(Footnote 1 continued from previous page)
(Attachment 16); MUR 4138 (Attachment 17); MUR 4140
(Attachment 18); MUR 4142 (Attachment 19); MUR 4143
(Attachment 20); MUR 4144 (Attachment 21); MUR 4145
(Attachment 22); MUR 4148 (Attachment 23); MUR 4149
(Attachment 24); MUR 4153 (Attachment 25); MUR 4155
(Attachment 26); MUR 4158 (Attachment 27); MUR 4163
(Attachment 28); MUR 4164 (Attachment 29); MUR 4169
(Attachment 30); MUR 4179 (Attachment 31); MUR 4195
(Attachment 32); MUR 4196 (Attachment 33); and MUR 4205
(Attachment 34).

warrant further investment of significant Commission resources.[2] Since the recommendation not to pursue the identified cases is based on staleness, this Office has not prepared separate narratives for these cases. As the Commission requested, in matters in which the Commission has made no findings, the responses to the complaints for the externally-generated matters and the referrals for the internally-generated matters are attached to the report because this information was not previously circulated to the Commission. See Attachments 35-45. For cases in which the Commission has already made findings and for which each Commissioner's office has an existing file, this Office has attached the most recent General Counsel's Report.

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective October 16, 1995. By closing the cases effective October 16, 1995, CED and the Legal Review Team will respectively have the additional time necessary for preparing the closing letters and the case files for the public record.

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2. These matters are: PM 250 (Attachment 35); PM 272 (Attachment 36); MUR 3188 (Attachment 37); MUR 3554 (Attachment 38); MUR 3623 (Attachment 39); MUR 3988 (Attachment 40); MUR 3996 (Attachment 41); MUR 4001 (Attachment 42); MUR 4007 (Attachment 43); MUR 4007 (Attachment 43); MUR 4008 (Attachment 44); and MUR 4018 (Attachment 45).

## III. RECOMMENDATIONS

A. Decline to open a MUR and close the file effective October 16, 1995 in the following matters:

1) PM 309
2) RAD 95L-12
3) PM 250
4) PM 272

B. Take no action, close the file effective October 16, 1995, and approve the appropriate letter in the following matters:

1) MUR 3554
2) MUR 3623
3) MUR 3988
4) MUR 3996
5) MUR 4001
6) MUR 4007
7) MUR 4008
8) MUR 4018
9) MUR 4118
10) MUR 4119
11) MUR 4120
12) MUR 4122
13) MUR 4123
14) MUR 4124
15) MUR 4125
16) MUR 4126
17) MUR 4130
18) MUR 4133
19) MUR 4134
20) MUR 4135
21) MUR 4136
22) MUR 4137
23) MUR 4138
24) MUR 4140
25) MUR 4142
26) MUR 4143
27) MUR 4144
28) MUR 4145
29) MUR 4148
30) MUR 4149

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31) MUR 4153
32) MUR 4155
33) MUR 4158
34) MUR 4163
35) MUR 4164
36) MUR 4169
37) MUR 4179
38) MUR 4195
39) MUR 4196
40) MUR 4205

C. Take no further action, close the file effective October 16, 1995 and approve the appropriate letter in MUR 3188.

9/29/95
Date

Lawrence M. Noble
General Counsel

9504370154

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
) Agenda Document #X95-85
Enforcement Priority )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on October 17, 1995, do hereby certify that the Commission decided by votes of 5-0 to take the following actions:

A. Decline to open a MUR and close the file effective October 17, 1995 in the following matters:

1) PM 309
2) RAD 95L-12
3) PM 250
4) PM 272

B. Take no action, close the file effective October 17, 1995, and approve the appropriate letter in the following matters:

1) MUR 3554
2) MUR 3623
3) MUR 3988
4) MUR 3996
5) MUR 4001
6) MUR 4007
7) MUR 4008
8) MUR 4018
9) MUR 4118

(continued)

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10) MUR 4119
11) MUR 4120
12) MUR 4122
13) MUR 4123
14) MUR 4124
15) MUR 4125
16) MUR 4126
17) MUR 4130
18) MUR 4133
19) MUR 4134
20) MUR 4135
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30) MUR 4149
31) MUR 4153
32) MUR 4155
33) MUR 4158
34) MUR 4163
35) MUR 4164
36) MUR 4169
37) MUR 4179
38) MUR 4195
39) MUR 4196
40) MUR 4205

C. Take no further action, close the file effective October 17, 1995 and approve the appropriate letter in MUR 3188.

(continued)

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Commissioners Aikens, Elliott, McDonald, McGarry, and Thomas voted affirmatively for each of the decisions; Commissioner Potter was not present.

Attest:

10-20-95
Date

Marjorie W. Emmons
Secretary of the Commission

9504370105 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1995

Edward Renaud
508 Fox Avenue
Belford, NJ 07718

RE: MUR 4196

Dear Mr. Renaud:

On March 24, 1995, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on October 17, 1995. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

9504370058

**MUR 4196**
**PALLONE FOR CONGRESS**

Edward Renaud filed a complaint alleging that the Washington National Insurance Company, Variable Annuity Life Insurance Company ("VALIC"), and the Connecticut General Life Insurance Company made corporate contributions to Congressman Frank Pallone's campaign. The complaint alleges that Sharon L. Norton and Thomas W. Cavanagh, attorneys who represented the complainant for the purpose of restoring him to his teaching position with Americans With Disabilities Act ("ADA") accommodations, concealed and participated in a conspiracy that gave Congressman Pallone a political and financial advantage during the 1994 elections and that as a result, Ms. Norton and Mr. Cavanagh illegally benefited from Congressman Pallone's re-election.

Washington National Insurance Company responds that it has never made any contributions to Congressman Pallone and that the Commission does not have jurisdiction over a complaint regarding an insurance claim. VALIC responds that its parent company, American General Insurance, has a separate segregated fund that is registered with the Commission but that neither VALIC nor American General has made any contributions or provided any support to Congressman Pallone. The Connecticut General Life Insurance Company responds that it is without knowledge or information to form a belief as to the truth of the allegations and therefore denies them.

In response to the complaint, the Pallone for Congress Committee states that the complaint make no allegations that could be construed as a violation of federal election law. Sharon Lynch Norton and Thomas W. Cavanagh, Jr. respond that the complaint was filed as a result of Ms. Norton's resistance to adding a lengthy list of defendants who were outside the scope of the lawsuit to the complainant's ADA claim and to pursuing a conspiracy allegation for which Mr. Renaud had no evidence. Ms. Norton and Mr. Cavanagh state that their decisions regarding the handling of the complainant's case were not influenced or affected by any agreement with Congressman Pallone or any other person alleged to have been irvolved in a conspiracy.

This matter is less significant relative to other matters pending before the Commission.

9504370059

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1995

Sharon Lynch Norton, Esq.
Thomas W. Cavanagh, Esq.
Chamun, Rosen, Cavanagh and Uliano
268 Norwood Ave., P.O. Box 38
West Long Branch, NJ 07764

RE: MUR 4196

Dear Ms. Norton and Mr. Cavanagh:

On March 30, 1995, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against you. See attached narrative. Accordingly, the Commission closed its file in this matter on October 17, 1995.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

9504370160

**MUR 4196**
**PALLONE FOR CONGRESS**

Edward Renaud filed a complaint alleging that the Washington National Insurance Company, Variable Annuity Life Insurance Company ("VALIC"), and the Connecticut General Life Insurance Company made corporate contributions to Congressman Frank Pallone's campaign. The complaint alleges that Sharon L. Norton and Thomas W. Cavanagh, attorneys who represented the complainant for the purpose of restoring him to his teaching position with Americans With Disabilities Act ("ADA") accommodations, concealed and participated in a conspiracy that gave Congressman Pallone a political and financial advantage during the 1994 elections and that as a result, Ms. Norton and Mr. Cavanagh illegally benefited from Congressman Pallone's re-election.

Washington National Insurance Company responds that it has never made any contributions to Congressman Pallone and that the Commission does not have jurisdiction over a complaint regarding an insurance claim. VALIC responds that its parent company, American General Insurance, has a separate segregated fund that is registered with the Commission but that neither VALIC nor American General has made any contributions or provided any support to Congressman Pallone. The Connecticut General Life Insurance Company responds that it is without knowledge or information to form a belief as to the truth of the allegations and therefore denies them.

In response to the complaint, the Pallone for Congress Committee states that the complaint make no allegations that could be construed as a violation of federal election law. Sharon Lynch Norton and Thomas W. Cavanagh, Jr. respond that the complaint was filed as a result of Ms. Norton's resistance to adding a lengthy list of defendants who were outside the scope of the lawsuit to the complainant's ADA claim and to pursuing a conspiracy allegation for which Mr. Renaud had no evidence. Ms. Norton and Mr. Cavanagh state that their decisions regarding the handling of the complainant's case were not influenced or affected by any agreement with Congressman Pallone or any other person alleged to have been involved in a conspiracy.

This matter is less significant relative to other matters pending before the Commission.

9504370061

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1995

John E. Tully, Treasurer
Pallone for Congress
P.O. Box 3176, 540 Broadway
Long Branch, NJ 07740

RE: MUR 4196

Dear Mr. Tully:

On March 30, 1995, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Pallone for Congress and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on October 17, 1995.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

cc: Daniel P. Jackson, Esq.

9504370062

**MUR 4196**
**PALLONE FOR CONGRESS**

Edward Renaud filed a complaint alleging that the Washington National Insurance Company, Variable Annuity Life Insurance Company ("VALIC"), and the Connecticut General Life Insurance Company made corporate contributions to Congressman Frank Pallone's campaign. The complaint alleges that Sharon L. Norton and Thomas W. Cavanagh, attorneys who represented the complainant for the purpose of restoring him to his teaching position with Americans With Disabilities Act ("ADA") accommodations, concealed and participated in a conspiracy that gave Congressman Pallone a political and financial advantage during the 1994 elections and that as a result, Ms. Norton and Mr. Cavanagh illegally benefited from Congressman Pallone's re-election.

Washington National Insurance Company responds that it has never made any contributions to Congressman Pallone and that the Commission does not have jurisdiction over a complaint regarding an insurance claim. VALIC responds that its parent company, American General Insurance, has a separate segregated fund that is registered with the Commission but that neither VALIC nor American General has made any contributions or provided any support to Congressman Pallone. The Connecticut General Life Insurance Company responds that it is without knowledge or information to form a belief as to the truth of the allegations and therefore denies them.

In response to the complaint, the Pallone for Congress Committee states that the complaint make no allegations that could be construed as a violation of federal election law. Sharon Lynch Norton and Thomas W. Cavanagh, Jr. respond that the complaint was filed as a result of Ms. Norton's resistance to adding a lengthy list of defendants who were outside the scope of the lawsuit to the complainant's ADA claim and to pursuing a conspiracy allegation for which Mr. Renaud had no evidence. Ms. Norton and Mr. Cavanagh state that their decisions regarding the handling of the complainant's case were not influenced or affected by any agreement with Congressman Pallone or any other person alleged to have been involved in a conspiracy.

This matter is less significant relative to other matters pending before the Commission.

9504370063

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

October 23, 1995

Carol J. Ward, Esq.
CIGNA Corporation
1650 Market Street, P.O. Box 7716
Philadelphia, 19192-1550

RE: MUR 4196
Connecticut General Life Insurance Company

Dear Ms. Ward:

On March 30, 1995, the Federal Election Commission notified your client, Connecticut General Life Insurance Company, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your client. See attached narrative. Accordingly, the Commission closed its file in this matter on October 17, 1995.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

9504370064

**MUR 4196**
**PALLONE FOR CONGRESS**

Edward Renaud filed a complaint alleging that the Washington National Insurance Company, Variable Annuity Life Insurance Company ("VALIC"), and the Connecticut General Life Insurance Company made corporate contributions to Congressman Frank Pallone's campaign. The complaint alleges that Sharon L. Norton and Thomas W. Cavanagh, attorneys who represented the complainant for the purpose of restoring him to his teaching position with Americans With Disabilities Act ("ADA") accommodations, concealed and participated in a conspiracy that gave Congressman Pallone a political and financial advantage during the 1994 elections and that as a result, Ms. Norton and Mr. Cavanagh illegally benefited from Congressman Pallone's re-election.

Washington National Insurance Company responds that it has never made any contributions to Congressman Pallone and that the Commission does not have jurisdiction over a complaint regarding an insurance claim. VALIC responds that its parent company, American General Insurance, has a separate segregated fund that is registered with the Commission but that neither VALIC nor American General has made any contributions or provided any support to Congressman Pallone. The Connecticut General Life Insurance Company responds that it is without knowledge or information to form a belief as to the truth of the allegations and therefore denies them.

In response to the complaint, the Pallone for Congress Committee states that the complaint make no allegations that could be construed as a violation of federal election law. Sharon Lynch Norton and Thomas W. Cavanagh, Jr. respond that the complaint was filed as a result of Ms. Norton's resistance to adding a lengthy list of defendants who were outside the scope of the lawsuit to the complainant's ADA claim and to pursuing a conspiracy allegation for which Mr. Renaud had no evidence. Ms. Norton and Mr. Cavanagh state that their decisions regarding the handling of the complainant's case were not influenced or affected by any agreement with Congressman Pallone or any other person alleged to have been involved in a conspiracy.

This matter is less significant relative to other matters pending before the Commission.

9504370065

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1995

Lyn Utrecht, Esq.
Oldaker, Ryan & Leonard
818 Connecticut Avenue
Suite 1100
Washington, D.C. 20006

RE: MUR 4196
The Variable Annuity Life Insurance Company

Dear Ms. Utrecht:

On March 30, 1995, the Federal Election Commission notified your client, The Variable Annuity Life Insurance Company, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your client. See attached narrative. Accordingly, the Commission closed its file in this matter on October 17, 1995.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

9504370066

**MUR 4196**
**PALLONE FOR CONGRESS**

Edward Renaud filed a complaint alleging that the Washington National Insurance Company, Variable Annuity Life Insurance Company ("VALIC"), and the Connecticut General Life Insurance Company made corporate contributions to Congressman Frank Pallone's campaign. The complaint alleges that Sharon L. Norton and Thomas W. Cavanagh, attorneys who represented the complainant for the purpose of restoring him to his teaching position with Americans With Disabilities Act ("ADA") accommodations, concealed and participated in a conspiracy that gave Congressman Pallone a political and financial advantage during the 1994 elections and that as a result, Ms. Norton and Mr. Cavanagh illegally benefited from Congressman Pallone's re-election.

Washington National Insurance Company responds that it has never made any contributions to Congressman Pallone and that the Commission does not have jurisdiction over a complaint regarding an insurance claim. VALIC responds that its parent company, American General Insurance, has a separate segregated fund that is registered with the Commission but that neither VALIC nor American General has made any contributions or provided any support to Congressman Pallone. The Connecticut General Life Insurance Company responds that it is without knowledge or information to form a belief as to the truth of the allegations and therefore denies them.

In response to the complaint, the Pallone for Congress Committee states that the complaint make no allegations that could be construed as a violation of federal election law. Sharon Lynch Norton and Thomas W. Cavanagh, Jr. respond that the complaint was filed as a result of Ms. Norton's resistance to adding a lengthy list of defendants who were outside the scope of the lawsuit to the complainant's ADA claim and to pursuing a conspiracy allegation for which Mr. Renaud had no evidence. Ms. Norton and Mr. Cavanagh state that their decisions regarding the handling of the complainant's case were not influenced or affected by any agreement with Congressman Pallone or any other person alleged to have been involved in a conspiracy.

This matter is less significant relative to other matters pending before the Commission.

9504370067

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1995

Paula Shopiro, Esq.
Washington National Insurance, Co.
300 Tower Parkway
Lincolnshire, IL 60069-3665

RE: MUR 4196
Washington National Insurance Company

Dear Ms. Shopiro:

On March 30, 1995, the Federal Election Commission notified your client, Washington National Insurance Company, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your client. See attached narrative. Accordingly, the Commission closed its file in this matter on October 17, 1995.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

9504370108

**MUR 4196**
**PALLONE FOR CONGRESS**

Edward Renaud filed a complaint alleging that the Washington National Insurance Company, Variable Annuity Life Insurance Company ("VALIC"), and the Connecticut General Life Insurance Company made corporate contributions to Congressman Frank Pallone's campaign. The complaint alleges that Sharon L. Norton and Thomas W. Cavanagh, attorneys who represented the complainant for the purpose of restoring him to his teaching position with Americans With Disabilities Act ("ADA") accommodations, concealed and participated in a conspiracy that gave Congressman Pallone a political and financial advantage during the 1994 elections and that as a result, Ms. Norton and Mr. Cavanagh illegally benefited from Congressman Pallone's re-election.

Washington National Insurance Company responds that it has never made any contributions to Congressman Pallone and that the Commission does not have jurisdiction over a complaint regarding an insurance claim. VALIC responds that its parent company, American General Insurance, has a separate segregated fund that is registered with the Commission but that neither VALIC nor American General has made any contributions or provided any support to Congressman Pallone. The Connecticut General Life Insurance Company responds that it is without knowledge or information to form a belief as to the truth of the allegations and therefore denies them.

In response to the complaint, the Pallone for Congress Committee states that the complaint make no allegations that could be construed as a violation of federal election law. Sharon Lynch Norton and Thomas W. Cavanagh, Jr. respond that the complaint was filed as a result of Ms. Norton's resistance to adding a lengthy list of defendants who were outside the scope of the lawsuit to the complainant's ADA claim and to pursuing a conspiracy allegation for which Mr. Renaud had no evidence. Ms. Norton and Mr. Cavanagh state that their decisions regarding the handling of the complainant's case were not influenced or affected by any agreement with Congressman Pallone or any other person alleged to have been involved in a conspiracy.

This matter is less significant relative to other matters pending before the Commission.

9504370069

THIS IS THE END OF MUR # 4196

9504370100

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 4197

DATE FILMED 11-22-95 CAMERA NO. ___

CAMERAMAN JMH

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