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October 5, 2023

Via eCourts

Joseph H. Orlando, Clerk
Superior Court of New Jersey
Appellate Division
P.O. Box 006
Hughes Justice Complex
Trenton, New Jersey 08625

Re: In the Matter of Police Lieutenant (PM3381E), Jersey City
Docket No. A-3807-22

Civil Action: On Appeal from a Final Agency Decision of the Civil
Service Commission

Letter Brief on behalf of Respondent Civil Service Commission in
Opposition to the Motion for a Stay

Dear Mr. Orlando:

Please accept this letter brief on behalf of the New Jersey Civil Service
Commission in opposition to the motion to stay the Commission's final agency
decision.



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PROCEDURAL HISTORY AND STATEMENT OF FACTS¹

On June 22, 2023, Respondent, the Civil Service Commission, contacted Appellant, Jersey City (the City), to inquire whether the Commission should issue an announcement for a promotional examination for Police Lieutenant.

¹ Because they are closely related, these sections are combined for efficiency and the court’s convenience.

(Pa11).¹ The City indicated that it did not wish to move forward with the announcement, as it intended to maintain its current staffing level of sixty-six Police Lieutenants for the foreseeable future. (Pa11-12). However, upon reviewing agency records, the Commission's Division of Agency Services determined that the City's previously existing eligible list had been exhausted. (Ra2-3). Thus, on July 5, 2023, in accordance with longstanding policy in which an examination announcement is automatically issued upon the exhaustion of an eligible list for certain public safety titles, the Division of Agency Services advised the City that it would be issuing the examination announcement. Ibid. The Division of Agency services further advised the City that if it could provide a justification as to why the examination announcement was not needed, the Division would consider authorizing a request to opt-out of the current examination cycle. Ibid.

On July 6, 2023, the City requested that the examination announcement be retracted. (Ra1-2). The City explained that it has no need to hire any lieutenants, and thus, in its view, announcing the examination would be a waste of taxpayer resources and give a false expectation of promotion to the City's

¹ "Pa" refers to the City's motion appendix.

"Ra" refers to the Commission's motion appendix.

"Pb" refers to the City's motion brief.

sergeants who sign up for the examination. Ibid. In response, the Division of Agency Services advised that it would hold the examination announcement in abeyance until the City's request to opt-out of the examination could be formally processed. (Ra1).

On July 12, 2023, the Division of Agency Services denied the City's opt-out request, noting that a review of its records revealed that in November of 2022, the City had recorded forty-four provisional appointments to the Police Lieutenant title, and had submitted a request to certify forty-eight names from the previously existing eligible list, which only had fifty names on it at the time it was promulgated. (Pa45). So, given the number of provisional appointees and vacant positions, the Division of Agency Services reaffirmed that the City needed a new eligible list for the Police Lieutenant title. Ibid.

The City appealed to the Commission, asserting that as a matter of managerial prerogative, it should be permitted to opt-out of the promotional examination cycle. (Pa11-12). Asserting that the City intends to maintain its current staffing level of sixty-six Police Lieutenants, it argued that a promotional examination would be a waste of time, money, and resources. Ibid.

The Jersey City Police Superior Officers Association (JCPSOA), the union representing the City's police sergeants, lieutenants, and captains, opposed the City's appeal. (Pa12-13). JCPSOA pointed out that nineteen of the

sixty-six current lieutenants in Jersey City have twenty-five years of service and could thus retire at any moment with full benefits and pension, and five more lieutenants would be reaching that service mark within the next year. (Pa13). Additionally, given new legislation entitling police officers to fifty percent of their pension after twenty-years of service, an additional eight Police Lieutenants could also plausibly choose to retire. Ibid. JCPSOA also acknowledged that the creation of an eligible list would not guarantee appointment of any of the individuals on the list, but argued it would nonetheless be better to have a merit-based promotional list in place, in the event the City needs to make a Police Lieutenant appointment. (Pa14).

In a final agency decision, the Commission denied the City's appeal. (Pa16). The Commission noted that in In re Promotional Lists for Public Safety Titles, DOP No. 2004-3187 (April 7, 2004) (Pa58), the Commission's predecessor, the Merit System Board, ordered that eligible lists for certain public safety titles be extended and that a new examination announcement be automatically listed in conjunction with a list extension whenever a continuing need to fill vacancies was supported by historical data. (Pa15). In the Commission's view, that decision stands for the policy of maintaining adequate eligible lists to ensure that appointments and promotions for public safety titles consistently be awarded based on merit and fitness. (Pa15-16). The process of

automatic examination announcements thus “serves to ensure that fully-qualified candidates may be appointed from lists rather than untested provisional employees.” (Pa16).

The Commission accordingly held that the record amply supported the automatic examination announcement for the Police Lieutenant title in this matter. Ibid. In the Commission’s view, the record evidenced Jersey City’s historic and ongoing need for public safety titles. Ibid. And with the exhaustion of the most recent eligible list, the automatic examination announcement would ensure that qualified candidates are available should the City determine that it needs to fill vacancies in the future. Ibid. The Commission also emphasized that canceling the examination would harm the sixty-six individuals who had already submitted applications and had begun preparing for the upcoming examination. Ibid. Finally, the Commission also noted that there is no vested right in appointment for individuals on a list; thus, the City would not be required to make any appointments if it did not want to. Ibid. The list would merely be available to ensure that if the City’s needs changed in the near future, it would have a list of qualified candidates to appoint from. Ibid.

On August 2, 2023, the City filed this appeal. Shortly after, the City requested that the Commission stay its final agency decision pending the City’s appeal to this court, which the Commission denied on September 20, 2023.

(Pa1). The Commission held that the factors for granting a stay had not been met. (Pa4). Namely, the City failed to show: a danger of immediate or irreparable harm; a likelihood of success on the merits; absence of harm to the other parties if the stay were granted; or that the public interest supported a stay. Ibid.

On September 26, 2023, the City filed this motion for a stay.

ARGUMENT

THE CITY HAS NOT SATISFIED ITS BURDEN TO SUPPORT ITS APPLICATION FOR A STAY

The City has not met its burden for establishing a basis for the relief it seeks. A motion for a stay is governed by the three-prong test for injunctive relief outlined in Crowe v. DeGioia, 90 N.J. 126 (1982). Accord Garden State Equality v. Dow, 216 N.J. 314, 320-21 (2013). The party seeking the stay must demonstrate:

(1) relief is needed to prevent irreparable harm; (2) the applicant's claim rests on settled law and has a reasonable probability of succeeding on the merits; and (3) balancing the "relative hardships to the parties reveals that greater harm would occur if a stay is not granted than if it were."

[Dow, 216 N.J. at 320 (quoting McNeil v. Legis. Apportionment Comm'n, 176 N.J. 484, 486 (2003) (LaVecchia, J., dissenting).]

The moving party bears the burden of proving each factor by clear and convincing evidence. Ibid. (citing Brown v. City of Paterson, 424 N.J. Super. 176, 183 (App. Div. 2012)). The City has failed to prove by clear and convincing evidence that any of the factors, let alone all of them, favor granting a stay.

A. The City has failed to establish how the scheduled administration of the Police Lieutenant examination will cause irreparable harm.

The City must show that the scheduled administration of the Police Lieutenant examination will cause irreparable harm. Dow, 216 N.J. at 320. “Harm is generally considered irreparable in equity if it cannot be redressed adequately by monetary damages.” Crowe, 90 N.J. at 132-33. See also Roseberg v. Am. Hotel & Garden Co., 121 A. 9, 13 (N.J.Ch. 1923) (“Irreparable injury means that the injury would be a material one, in its nature serious and grievous, and such that it is extremely difficult or impossible to definitely ascertain the resulting damages and adequately make just reparation.” (quoting Minnis v. Newbro-Gallogly Co., 140 N.W. 980, 983 (Mich. 1913))).

In denying the City’s stay request, the Commission found that the City failed to demonstrate irreparable harm. (Pa5). The Commission noted that the City’s arguments, namely that the examination would waste resources and taxpayer money, were financially based, and thus should not be considered

irreparable harm. Ibid. And, in any event, the Commission emphasized that the City would not bear any of the financial costs of the examination. Ibid. Rather, it would be the Commission that would expend its resources to administer the examination to the City's applicants. Ibid. The Commission rejected the argument that the City would somehow be harmed by the Commission's use of its own resources to administer the examination. Ibid.

The Commission also rejected the City's argument that the examination would impinge on the City's managerial prerogative, as the administration of the examination and promulgation of the list would not require the City to make appointments if it did not want to. Ibid. Finally, the Commission rejected the City's argument that the administration of the examination would cause irreparable harm to the sergeants who sit for the examination, by giving them false hope of promotion. (Pa6). The Commission emphasized that an individual has no entitlement to appointment by having his or her name on a list. Ibid. And the JCPSOA acknowledged that its members understood that. Ibid.

The City largely raises the same unavailing arguments before this court. It contends that the scheduled administration of the examination will: 1) impinge on the City's managerial prerogative; 2) create false hope for applicants that they might be promoted; and 3) moot the City's appeal. (Pb13-15). None of these arguments come close to demonstrating irreparable harm.

First, the administration of the examination and creation of a resulting eligible list will have absolutely no effect on the City's hiring prerogatives. The City is in no way required to appoint additional lieutenants if it does not want to. See Schroder v. Kiss, 74 N.J. Super. 229, 240 (App. Div. 1962) ("One who successfully passes an examination and is placed on an eligible list does not thereby gain a vested right to appointment."). The existence of the list will merely provide the City with qualified tested candidates to choose from in the event that the City determines it does, in fact, need to make an appointment. See N.J. Const. Art. VII, Sec. 1, Par. 2 ("Appointments and promotions in the civil service of the State shall be made according to merit and fitness to be ascertained, as far as practicable, by examination, which as far as practicable, shall be competitive.") There is accordingly no impingement on the City's hiring prerogatives, and thus plainly no harm to the City.

Second, the City oddly attributes irreparable harm to its current sergeants who may sit for the scheduled exam, in the form of "false hope" of promotion. (Pb15). Yet, the JCPSOA, which represents the interests of the City's sergeants, has strenuously argued in favor of the examination. (Pa2-3; Pa13-14). Again, it is settled law that any individual on the resulting eligible list will have no vested right in appointment, Schroder, 74 N.J. Super. at 40, and the JCPSOA has readily acknowledged this. (Pa14). There is accordingly no credible risk of

“false hope.” The JCPSOA has expressed that the sergeants evidently understand the present hiring prerogatives of the City; thus, it is up to each individual to determine whether they want to take the examination under those circumstances. An individual who sits for the exam with the understanding that they will not likely be appointed is not irreparably harmed. However, if the City’s request to cancel the examination were granted, those individuals who already began preparing for the examination would undoubtedly be harmed, in that they would have wasted their time and money preparing for an examination they would not even get to take.

Third, the City asserts that if the stay is not granted it will moot its pending appeal. (Pb14). While this may be true, it does not amount to irreparable harm. Damaging the legal position of the City’s appeal cannot constitute irreparable harm, where the City has failed to demonstrate any actual harm it will endure if it loses that appeal. The administration of the examination will not cost the city any money nor will it impinge on the City’s hiring prerogatives. Thus, whether the City loses its appeal on the merits or mootness grounds will have the same result: the City will not be materially harmed.

B. The City has failed to establish a reasonable probability of success on the merits.

The Commission's decision is reasonable and based on substantial credible evidence; as such, the City has not shown a "reasonable probability of succeeding on the merits." Dow, 216 N.J. at 320.

"The scope of appellate review of a final agency decision is limited." In re Carter, 191 N.J. 474, 482 (2007). A reviewing court must give deference to an agency's decision unless it is arbitrary, capricious, unsupported by substantial credible evidence contained in the record, or in violation of express or implicit legislative policies. In re Juvenile Detention Officer Union Cnty., 364 N.J. Super. 608, 614 (App. Div. 2003); see also In re Taylor, 158 N.J. 644, 656-57 (1999). "A reviewing court 'may not substitute its own judgment for the agency's, even though the court might have reached a different result.'" In re Stallworth, 208 N.J. 182, 194 (2011) (quoting Carter, 191 N.J. at 483). "This is particularly true when the issue under review is directed to the agency's special 'expertise and superior knowledge of a particular field.'" Id. at 195 (quoting In re Herrmann, 192 N.J. 19, 28 (2007)). Accordingly, unless the Commission's determination is "patently incompatible with the language and spirit of the law," a court should not interfere with the Commission's exercise of authority. In re Hudson Cnty. Probation Dep't, 178 N.J. Super. 362, 371 (App. Div. 1981)

(quoting Walsh v. Civil Serv. Dep't, 32 N.J. Super. 39, 44 (App. Div. 1954)).

The Commission's decision to automatically announce the Police Lieutenant examination for Jersey City is squarely within the Commission's authority and expertise. Pursuant to the Civil Service Act, "[t]he commission shall provide for . . . the announcement and administration of examinations which shall test fairly the knowledge, skills and abilities required to satisfactorily perform the duties of a title or group of titles." N.J.S.A. 11A:4-1. Moreover, "[a] vacancy shall be filled by a promotional examination when considered by the commission to be in the best interest of the career service." N.J.S.A. 11A:4-2. Absent an explicit delegation by the Commission's Chairperson, see N.J.A.C. 4A:1-4.1, there is no provision in the Commission's statute or rules permitting an appointing authority to choose when and how to administer an examination; that decision is firmly within the sole authority and discretion of the Commission.

Here, the Commission's decision to automatically announce the Police Lieutenant examination is based on its long-standing policy and substantial credible evidence in the record. (Pa15-16). At base, the record reflects that the City's current Police Lieutenant has one name left, and has thus been exhausted. (Pa11-12; Pa16). As such, the Commission reasonably ordered a competitive

examination to ensure qualified candidates are available to the City should it need to make an appointment. Ibid.

The City's assertion that it did not make the forty-four provisional appointments referenced in the Division of Agency Services' denial of the opt-out request, is a red herring. (Pb9). At the time of the Commission's final agency decision denying the opt-out request, the City's County and Municipal Personnel System (CAMPS) records indicated forty-four provisional appointments were made. (Pa14). To the extent the CAMPS record was inaccurate, it was because the City failed to properly update its records in that system. Ibid. Regardless, it is immaterial whether the City made forty-four provisional appointments; all that matters is that the existing list, which had fifty names at the time of its promulgation, was exhausted after the City made forty-eight appointments from that list. (Pa11-12). Given the exhaustion of that list, which the City does not dispute, (Pb9), the Commission's decision is plainly reasonable and consistent with the State Constitution's preference for competitive testing. N.J. Const. Art. VII, Sec. 1, Par. 2.

Indeed, if the examination were cancelled and the City later needed to appoint additional lieutenants in the near future, it would have to do so by provisional appointments as opposed to the constitutionally preferred method of appointment from a competitive list. See N.J.A.C. 4A:4-15 ("A provisional appointment may be made only . . . when all of the following conditions are met:

1. There is no complete list of eligibles, and no one remaining on an incomplete list will accept provisional appointment . . .”). As pointed out by the JCPSOA, it is eminently possible that multiple Police Lieutenants may retire or otherwise leave their job in the next year. (Pa13-14). Moreover, the resulting eligible list would last up to three years or more. N.J.A.C. 4A:4-3.3; In re Promotional Lists, (Pa58). Thus, with the realistic possibility that the City may need to make an appointment in the coming years, the administration of the examination will ensure compliance with the State’s preference for permanent competitive appointments as opposed to provisional appointments. The Commission’s decision is squarely within its sphere of expertise and reasonable; it is deserving of deference and should be affirmed.

C. The public’s interest supports proceeding with the scheduled examination

Finally, the City argues that the public interest weighs in favor of a stay of the examination, because in the City’s view, the examination will distract its officers from their jobs and waste taxpayer money. (Pb14-15). These arguments entirely miss the mark.

The City’s argument that studying for an examination will detract from the work of its sergeants strains all logic. First, as noted by the Commission, the City and the public will benefit from having candidates “review applicable

laws, rules and best practices as they prepare for the examination.” (Pa6). The City’s suggestion that the public will somehow be worse off because police sergeants are studying to better their understanding of police work is inconsistent with our state’s preference for ranked competitive examination.

Second, as the Commission explained, the cost for including the City’s applicants in the state-wide competitive examination is relatively minor. (Pa5). The uniform examination is going to be conducted regardless of whether the City’s applicants participate; thus, any use of additional resources for including those candidates is de minimis. Ibid. And it is not for the City to determine what constitutes an appropriate use of the Commission’s resources, particularly when the use of those resources is in furtherance of the Commission’s statutory mission of ensuring competitive appointments. Ibid.; N.J.S.A. 11A:3-2.1(a).

Finally, it must be emphasized that the entire point of conducting the examination and rendering an eligible list is for the sake of complying with our State’s Constitution and the State’s strong public policy favoring competitive testing. N.J.S.A. 11A:3-2.1(a). Without an eligible list, the public will be deprived of tested candidates from serving as Police Lieutenants in the event appointments are needed. Given that conducting the examination and producing the list will have no legitimate downside for the City, the competing equities heavily favor allowing the examination to take place as scheduled.

CONCLUSION

For these reasons, the City's motion to stay the Commission's decision should be denied.

Respectfully submitted,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW
JERSEY

By: /s/Levi Klinger-Christiansen
Levi Klinger-Christiansen
Deputy Attorney General
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Assistant Attorney General
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Cc: counsel of record (via e-courts)

Arthur R. Thibault

From: Nance, Scott [CSC] <Scott.Nance@csc.nj.gov>
Sent: Thursday, July 6, 2023 5:22 PM
To: Arthur R. Thibault; JMetro@jcnj.org
Cc: JShea@NJJCPS.ORG; TMoody@NJJCPS.ORG; J_Carroll@jcnj.org; Joanne Rosa; RKearns@NJJCPS.ORG; JMinella@jcnj.org; Gordon, Jaclyn [CSC]
Subject: RE: URGENT: Request to Retract Posting PM3381E - Police Lieutenant Examination, Jersey City

Mr. Thibault,

Please be advised that Jersey City was not initially included in the current exam cycle for Police Lieutenant simply because our records indicate that there is a sufficient number of eligible candidates on the current eligible list (PM4118C). However, after further review, it was revealed that the City has an outstanding certification (PL230105) from which it made a number of appointments; thus rendering PM4118C exhausted/incomplete. As stated below, an exam announcement is automatically issued when a jurisdiction has an expired, incomplete or exhausted eligible list for certain public safety titles.

Considering the clarifying information you provided below, in which you state "the City has no need to fill vacancies in the lieutenant rank", it is appropriate to hold the current exam announcement for Police Lieutenant in Jersey City (PM3381E) in abeyance until the request to opt-out can be processed. If the request is approved, the City will be notified under separate cover, and PM3381E will be formally cancelled.

Please let me know if you have any questions.

Thank you,
Scott Nance
NJ Civil Service Commission
Division of Agency Services
(609) 690-8076

From: Arthur R. Thibault <athibault@ammm.com>
Sent: Thursday, July 6, 2023 2:13 PM
To: Nance, Scott [CSC] <Scott.Nance@csc.nj.gov>; JMetro@jcnj.org
Cc: JShea@NJJCPS.ORG; TMoody@NJJCPS.ORG; J_Carroll@jcnj.org; Joanne Rosa <RosaJ@jcnj.org>; RKearns@NJJCPS.ORG; JMinella@jcnj.org; Gordon, Jaclyn [CSC] <Jaclyn.Gordon@csc.nj.gov>
Subject: [EXTERNAL] RE: URGENT: Request to Retract Posting PM3381E - Police Lieutenant Examination, Jersey City

Dear Mr. Nance,

This firm serves as labor counsel to the City of Jersey City and represents its interests with regard to the above matter. The City has requested that I respond on its behalf to your email below and reiterate its position that (1) no request for a promotional examination was made by the City; and (2) the appointing authority has not authorized a promotional exam for the rank of lieutenant.

Substantively to your email response to City Business Administrator Metro, it reads as if the Commission, on its own accord, added Jersey City allegedly due to a 20 year old decision from the MSB. Such a position begs numerous questions, such as why Jersey City was not listed on prior announcements for the promotional exam, why Ms. Gordon

was asking the City on June 22, 2023 whether the City was seeking a promotional exam for police lieutenant, why when Ms. Gordon was told by the City on June 26, 2023, without equivocation, no, that a request for examination was not approved or authorized by the Appointing Authority, and why Jersey City was an add on July 5, 2023.

Furthermore, the MSB decision you rely upon deals with requests for list extensions and is specific to an appointing authority's need to fill vacancies. Specifically, the order from that decision extended promotional list for various titles and stated that new announcements would be automatically issued "in conjunction with the list extension whenever a continuing need to fill vacancies" is supported by data. The City finds the Commission's reliance on this decision for its last minute decision to include Jersey City as part of the announcement faulty since the Commission's own announcements state that exams for Police Sergeant, Lieutenant and Captain are given annually.

Finally, as should have been abundantly clear, the City has no need to fill vacancies in the lieutenant rank; it has plenty of lieutenants and more than it needs for its department. Given this fact, announcing an examination for lieutenant is inefficient and a waste of taxpayer resources. In this regard, the Commission will require additional testing sites with the inclusion of Jersey City when the City has no present need for or an intention to promote in the foreseeable future. Announcing an annual examination to include now the City also provides a false impression to Jersey City sergeants who sign-up to take the exam that they may be promoted, involving an emotional and mental expense of unnecessary preparation and the expenditure of personal funds to study for the examination. The City wants them to focus on being sergeants, not preparing for an exam that has no meaning to the City or the Department. It is for these reasons that the prerogative to request an examination and the prerogative to determine a need to fill vacancies rests with the Appointing Authority.

Therefore, for the above reasons, the Commission should honor the City's request submitted by the Appointing Authority and retract the announcement for Jersey City Police Lieutenant.

Thank you for your attention to this matter.

Arthur R. Thibault Jr., Esq.

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From: Nance, Scott [CSC] <Scott.Nance@csc.nj.gov>

Sent: Wednesday, July 5, 2023 4:38 PM

To: JMetro@icnj.org

Cc: Arthur R. Thibault <athibault@ammm.com>; JShea@NJJCPS.ORG; TMoody@NJJCPS.ORG; J_Carroll@icnj.org; Joanne Rosa <RosaJ@icnj.org>; RKearns@NJJCPS.ORG; JMinella@icnj.org; Gordon, Jaclyn [CSC] <Jaclyn.Gordon@csc.nj.gov>

Subject: RE: URGENT: Request to Retract Posting PM3381E - Police Lieutenant Examination, Jersey City

Good Afternoon Mr. Metro,

This is in reference to your email below and your July 5, 2023 letter regarding the exam announcement for the City of Jersey City Police Lieutenant (PM3381E)

You indicate that the City has not authorized nor requested the issuance of PM3381E. Consequently, you request immediate retraction of the exam announcement.

Please be advised that, based on the attached long standing Merit System Board order of "In the Matter of Promotional Lists for Public Safety Titles" (DOP Docket No. 2004-3187), an exam announcement is automatically issued when a jurisdiction has an incomplete or exhausted eligible list for certain public safety titles, including Police Lieutenant. As Jersey City's current Police Lieutenant eligible list (PM4118C) appears to be exhausted or incomplete, we find it appropriate to issue the exam announcement for PM3381E. Therefore, this announcement will remain posted until the July 21, 2023 filing deadline. Or, if the City can provide justification as to why the announcement is not needed, we would then consider authorizing a request for opt-out of the current exam cycle.

It should also be noted that there is an outstanding certification for Jersey City Police Lieutenant (PL230105) which is currently past due and in violation status. To prevent enforcement action, it is suggested that the City dispose of PL230105 at the earliest convenience.

Thank you,
Scott Nance
NJ Civil Service Commission
Division of Agency Services

From: Gordon, Jaclyn [CSC] <Jaclyn.Gordon@csc.nj.gov>
Sent: Wednesday, July 5, 2023 2:38 PM
To: Nance, Scott [CSC] <Scott.Nance@csc.nj.gov>
Subject: Fw: URGENT: Request to Retract Posting PM3381E - Police Lieutenant Examination, Jersey City

From: John Metro <JMetro@jcnj.org>
Sent: Wednesday, July 5, 2023 2:32 PM
To: Gordon, Jaclyn [CSC] <Jaclyn.Gordon@csc.nj.gov>; Glenn, Kelly [CSC] <Kelly.Glenn@csc.nj.gov>
Cc: Arthur R. Thibault <athibault@ammm.com>; James Shea <JShea@NJJCPS.ORG>; Tawana Moody <TMoody@NJJCPS.ORG>; James Carroll <J_Carroll@jcnj.org>; Joanne Rosa <RosaJ@jcnj.org>; Robert Kearns <RKearns@NJJCPS.ORG>; John Minella <JMinella@jcnj.org>
Subject: [EXTERNAL] URGENT: Request to Retract Posting PM3381E - Police Lieutenant Examination, Jersey City

Dear Ms. Jaclyn,

I trust this message finds you well.

I am writing to formally request your attention to an important matter pertaining to the City of Jersey City's personnel management. Specifically, I am seeking your assistance with the retraction of the posting for the Police Lieutenant Examination, classified as PM3381E.

As appointing authority of the City of Jersey City, I have not authorized or requested this promotional test for the city.

Please find attached the corresponding documents that provide a detailed insight into this matter. Your understanding and collaboration on this issue is greatly appreciated.

Thank you in advance for your prompt attention to this matter. Please feel free to contact me should you need further clarification or additional information.