

Urban League of Greater New Brunswick

The Mayor and Council of The Borough of
Carteret CA

General P P P
~~East Brunswick~~
Brunswick) Jan - 1975

Interrogatory for the Township Committee of the Township of East Brunswick.

pages 12

This interrogatory entails several statistics
on income and race; Public schools, housing units, and
job category. ~~etc~~

note:

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are disproportionate to the rest.
Some pages are double sided.

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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION - MIDDLESEX COUNTY
DOCKET No. C-4122-73

URBAN LEAGUE OF GREATER
NEW BRUNSWICK, et al.

Plaintiffs,

v.

THE MAYOR AND COUNCIL OF
THE BOROUGH OF CARTERET,
et al.

Defendants

Civil Action

INTERROGATORIES

To:

BERTRAM E. BUSCH, Esq.
99 Bayard Street
New Brunswick, New Jersey 08903

DEMAND is hereby made of the defendant TOWNSHIP COMMITTEE
OF THE TOWNSHIP OF EAST BRUNSWICK for Certified
Answers to the following interrogatories within the time
prescribed by the Rules of this Court.

1. Please provide the most current statistics
available on the population of the municipality, by
income level and race (categorized as white, black,

spanish-speaking, other), citing source.

See attached.

2. Provide for each public school within the municipality, the number of pupils enrolled, with sub-totals for whites, blacks, spanish-speaking and other, giving school name, location, grades served and area.

See attached.

3. Provide the number of dwellings presently within the municipality in each of the following value categories, as determined from the property tax rolls.

(a) Single family homes under \$15,000

62

(b) \$15,000 to \$25,000

527

(c) \$25,000 to \$35,000

2,614

(d) Over \$35,000

5,838.00

Interrogatory #2

RIDER

<u>Name of School</u>	<u>American Indian</u>	<u>Black American</u>	<u>Asian American</u>	<u>Spanish Surnamed American</u>	<u>White</u>	<u>Total</u>
Bowne, Grade Main St. 1-6	3	2	5	5	336	351
Central, Cranbury Rd. 1-6	0	5	2	2	409	418
Chittick, 1-6 Flagler St. Churchill Junior High School, Norton Rd. Grade 7-9	0	8	5	3	457	473
Crandall Kossman St. Grade K	0	5	8	5	1,192	1,210
Frost Frost Ave. Grade 1-6	0	2	4	4	189	198
Irwin Racetrack Rd. Grade 1-6	0	1	8	6	624	639
Hammarskjold Rues Lane Grade 7-9	1	3	9	2	491	505
East Brunswick High School, Cranbury Road Grade 10-12	0	11	5	8	1,248	1,272
	1	18	8	9	2,425	2,461

Interrogatory #2 (cont'd)

RIDER

Name of School	American Indian	Black American	Asian American	Spanish Surnamed American	White	Total
Lawrence Brook, Sullivan Way Grade K-7	0	5	14	0	471	490
McGinnis Dunhams Corner Rd. Grade K	0	4	4	0	239	247
Memorial Innes Rd. Grade 1-6	0	1	2	3	436	442
Smith Norton Rd. Grade 1-6	0	10	14	11	530	565
Trinity Church Canbury Rd. Grade K	0	0	0	0	159	159
Warnsdorfer Hardenburg La- Grade 1-6	0	1	15	1	634	651
Weber Riva Avenue Grade 1-4	0	1	0	0	97	98

4. Provide the number of multi-family units in each of the following rental categories and ranges.

Type	Rental Range					
	Under \$100	\$100 - \$149	\$150 - \$199	\$200 - \$249	\$250 & Over	
Efficiency	-	-	190	230	-	420
One-Bedroom	-	-	58	576	40	674
Two-Bedroom	-	-	-	45	132	176
Three or more Bedrooms	-	-	-	-	-	

1270

5. Provide the total number of mobile homes in municipality that exist as conforming uses under current zoning ordinance.

None as conforming uses. As of 2-4-75, 49 trailers are located at Steve's Trailer Park, Highway 18, as non-conforming uses.

6. Provide the number of housing units within the municipality that are below the standards required for new construction or rehabilitation in local building codes and housing standards ordinance. Indicate how many are currently occupied and how many vacant.

126 properties in the Washington Heights area. Systematic housing inspections were conducted in 1968 on these properties. All units were occupied. The 89 properties with violations had all violations abated with the assistance, in some cases, of a Federal Rehabilitation Grant.

7. Provide for each department in the municipality the number of municipal employees by job category, race, and annual salary or hourly wage.

See Rider.

RIDER

Interrogatory #7

	<u>Department</u>	<u>Job Category</u>	<u>Race</u>	<u>Annual salary</u>
1.	Filtration	Administrators (2)	White	\$ 10,000 to \$16,000
		Technicians (5)	White	6,000 to 10,000
		Para-Professionals (3)	White	8,000 to 13,000
		Office-Clerical (1)	White	4,000 to 6,000
		Skilled Craft (2)	White	8,000 to 13,000
2.	Inspection	Professionals (1)	White	16,000 to 25,000
		Technicians (5)	White	10,000 to 16,000
		Clerical (2)	White	6,000 to 8,000
3.	Finance	Administrators (1)	White	16,000 to 25,000
		Clerical (4)	White	6,000 to 13,000
		Revenue Collection Professional (1)	White	13,000 to 16,000
		Clerical (7)	1 Asian	4,000 to 10,000
4.	Public Works	Administrators (3)	White	10,000 to 16,000
		Clerical (1)	White	6,000 to 8,000
		Skilled Craft (12)	White	6,000 to 13,000
		two black		6,000 to 13,000
		Service-Maintenance (7)	White	6,000 to 10,000

Interrogatory #7

	<u>Department</u>	<u>Job Category</u>	<u>Race</u>	<u>Annual Salary</u>
5.	Data Processing	Administrators (1)	White	\$13,000 to 16,000
		Technicians (2)	White	6,000 to 10,000
		Clerical (1)	White	4,000 to 6,000
6.	Municipal Court	Administrators (1)	White	8,000 to 10,000
		Clerical (3)	White	6,000 to 8,000
7.	Planning & Zoning	Administrators (1)	White	16,000 to 25,000
		Clerical (2)	White	4,000 to 8,000
8.	Tax Assessment	Professionals (1)	White	16,000 to 25,000
		Clerical (3)	White	4,000 to 10,000
9.	Administration	Administrators (1)	White	16,000 to 25,000
		Professionals (4)	White	8,000 to 16,000
		Clerical (2)	White	6,000 to 13,000
10.	Public Safety	Administrators (1)	White	16,000 to 25,000
		Professionals (11)	White	13,000 to 25,000
		Technicians (14)	White	10,000 to 25,000
		Protective Service (45)	White	8,000 to 16,000
		1 black		8,000 to 10,000
		1 Spanish		13,000 to 16,000
		Clerical (10)	White	4,000 to 13,000
		Service Maintenance (2)	White	8,000 to 13,000
11.	Engineering	Professionals (2)	White	13,000 to 16,000
		Technicians (4)	White	8,000 to 13,000
		Clerical (1)	White	8,000 to 10,000
12.	Health	Administrators (1)	White	16,000 to 25,000
		Professionals (1)	White	13,000 to 16,000
		Clerical (2)	White	4,000 to 10,000
		Skilled Craft (1)	White	6,000 to 8,000

Interrogatory #7

	<u>Department</u>	<u>Job Category</u>	<u>Race</u>	<u>Annual Salary</u>
13.	Parks & Recreation	Administrators (1)	White	\$16,000 to 25,000
		Para Professionals (3)	White	4,000 to 10,000
		Service Maintenance (11)	White	6,000 to 10,000
14.	Township Clerk	Administrators (1)	White	16,000 to 25,000
		Clerical (2)	White	6,000 to 13,000

race, color, religion, creed, national origin, ancestry or ethnic origin and to safeguard the right of every person to sell, purchase, lease, sublease, assign, rent or obtain financing for the purchase, lease, sublease or assignment of housing accommodations without regard to race, color, religion, creed, national origin, ancestry or ethnic origin. Also to prohibit discrimination practices and the inciting of unrest, tension and fear with respect to real estate transactions in the Township of East Brunswick.

4-13.3 Definitions. The following definitions shall apply in the interpretation and enforcement of this section:

- a. "Person" includes one or more individuals, partnerships, associations, corporations, organizations, legal representatives, employees, agents, anyone acting for or on behalf of any person, or other legal entities.
- b. "Housing Accommodations" is any real property permitted for human habitation within the Township.
- c. "Unlawful Discrimination" includes those unlawful practices and acts specified herein.
- d. "Block Busting" is the practice of inducing owners of real property to sell or list real property for sale because of the actual or rumored advent into the neighborhood of a member of a racial, religious or ethnic group.

4-13.4 Unfair Practices Prohibited. It shall be unlawful for any person:

- a. To refuse to sell, rent, lease, assign or sublease or otherwise deny any housing accommodation to any person or persons because of race, color, religion, creed, national origin, ancestry or ethnic origin.
- b. To refuse to negotiate for the sale, rent, lease, assignment, sublease of any housing accommodation to any person or persons because of race, color, religion, creed, national origin, ancestry or ethnic origin.
- c. To represent that any housing accommodation is not available for inspection, sale, lease, sublease, assignment, rent, or withhold information about any housing accommodation, which is in fact, available for inspection, sale, lease, sublease, rent, assignment or to otherwise deny or withhold any housing accommodation to any person or persons because of race, color, religion, creed, national origin, ancestry or ethnic origin.
- d. To discriminate against any person or persons because of race, color, religion, creed, national origin, ancestry or ethnic

4.9.2 Interference with Fire Apparatus.

a. No person shall drive any vehicle over a fire hose except upon the specific permission or orders of the officer in charge where the hose is being used.

b. No person shall park any vehicle or otherwise cause any obstruction to be placed on or within 20 feet of the driveway approach of any fire house or other place where fire apparatus is then stored or within ten feet of any fire hydrant.

c. No unauthorized person with any vehicle shall follow within 200 feet of any fire or rescue apparatus.

4.9.3 False Alarms. No person shall knowingly turn in or cause to be turned in a false fire alarm.

4.9.4 Fire Hydrant. No unauthorized person shall open any fire hydrant without written permission of the township.

4-10 Interference with Drainage.

No person shall alter, plug up or otherwise tamper with any culvert, drain, drainage ditch, storm sewer, sanitary sewer, appurtenances, manhole or catch basin.

4-11 Dangerous Activities.

No person shall engage in any sport, game or other activity which endangers, frightens or annoys persons in any public place.

4-12 Opening and Closing Hours of Barber Shops.

No barber shop shall be open for business earlier than 8:30 a.m. or remain open after 6:00 p.m. except on Saturdays and the days preceding the holidays listed below, when they shall close no later than 7:00 p.m. All barber shops shall be closed on New Year's Day, Memorial Day, July Fourth, Labor Day, Thanksgiving and Christmas, and on all Sundays and Wednesdays except those Wednesdays which occur in a week in which a shop must close because of one of the holidays previously mentioned.

4-13 Anti-Discrimination in Housing.

4-13.1 Short Title. This section shall be known as the anti-discrimination in housing ordinance of the Township of East Brunswick.

4-13.2 Policy. The Township Council hereby declares it to be the public policy of the Township of East Brunswick to eliminate and prevent discrimination and involuntary segregation based on

origin in the terms, conditions or privileges of the sale, rental, lease, assignment or sublease of any housing accommodation.

e. To directly or indirectly advertise that the purchase or rental by persons of any particular race, color, religion, creed, national origin, ancestry or ethnic origin is unwelcome, objectionable, unacceptable or not solicited.

f. To use any form of application for purchase, rental, lease, assignment, sublease, or financing of any housing accommodation which inquires into the race, color, religion, creed, national origin, ancestry or ethnic origin of any person.

g. To engage in the practice of block busting, including but not limited to the following:

1. To induce directly or indirectly or attempt to induce directly or indirectly the sale or listing for sale of real property by representing that an adverse change has occurred or will or may occur with respect to the racial, religious, or ethnic composition of the block, neighborhood or area in which the property is located.

2. To induce directly or indirectly, or attempt to induce directly or indirectly the sale or listing for sale of real property by representing that the presence or anticipated presence of persons of any particular race, religion, or national origin in the area will or may result in

(a) The lowering of property values;

(b) An increase in the criminal or anti-social behavior in the area;

(c) A decline in the quality of the schools serving the area.

3. To make any misrepresentations concerning the listing for sale, or the sale of real property in the area for the purpose of inducing or attempting to induce the sale or listing for sale of real property.

4. To make any representation to any prospective purchaser that any block, neighborhood, or area has, will, or might undergo an adverse change with respect to the religion, racial or ethnic composition of the block, neighborhood, or area for the purpose of discouraging the purchase of property in a particular area.

5. To place a sign purporting to offer for sale any property that is not in fact offered for sale.

6. To advertise for sale or rental property which is non-existent or which is not actually for sale or rental.

7. To engage in, or hire, or conspire with others to commit acts or activities of any nature, the purpose of which is to coerce, cause panic, incite unrest, create or play upon fear with the pur-

4-13 TOWNSHIP OF EAST BRUNSWICK ORDINANCES

pose of inducing or attempting to induce the sale or listing for sale of real property.

8. To engage in any economic reprisal or any other form of intimidation against any person because that person has filed a complaint, testified, assisted, or participated in any manner in any investigation, proceeding, or conference under the terms of this ordinance.

9. To aid, abet, incite, compel or coerce any person to engage in any of the practices forbidden by this ordinance; or to obstruct or prevent any person from complying with the provisions of this ordinance.

h. No person, bank or lending institution shall discriminate against any applicant because of race, religion or ethnic background of such applicant or the prospective occupants or tenants of such housing accommodation in the granting, extending or renewing the rates, terms or conditions of any such loan.

i. The provisions of this section shall not apply to:

1. The rental of a single apartment in a two family dwelling, one unit of which at the time, is occupied by the owner as his residence or the household of his family.

2. Any religious institution or organization, or any organization operated for charitable or educational purposes, which is operated, supervised or controlled by or in connection with a religious organization, in the sale, lease or rent of real property, for limiting admission to or giving preference to persons of the same religion or denomination or from making such selection as is calculated by such organization to promote the religious principles for which it is established or maintained.

4-13.5 Enforcement.

a. Any person claiming to be aggrieved by a discriminatory or unfair practice within this Township may, by himself or his attorney, make, sign and file a written complaint with the Clerk of the Municipal Court of the Township, which complaint shall set forth the basis thereof and specify those Sections of the Ordinance violated.

b. The Clerk of the Municipal Court shall cause to be served the complaint upon the defendant pursuant to Rules of Court and set the matter down for hearing within 15 days of the service of the complaint.

4-13.6 Penalty for Violations.

a. Any person who shall violate any of the provisions of subsection 4-13.4 shall for each and every offense be deemed guilty

of a violation and, upon conviction thereof, shall be fined not more than five hundred dollars (\$500.00) or shall be imprisoned not more than sixty (60) days, or both.

b. Any person who sells or rents the housing accommodation in question to anyone other than the complainant after notice that a complaint of discrimination has been filed against such person shall, upon conviction of a violation under such a complaint, be fined not more than five hundred dollars (\$500.00) or shall be imprisoned not more than sixty (60) days, or both.

c. Upon conviction of a violation under this section, a violator may, after application to a court of competent jurisdiction, be ordered to make available to the complainant the premises involved.

4-13.7. *Posting of Notices and Injunctions.*

a. In order to prevent the involvement of innocent third parties in the rental or sale of housing accommodations or land in the period after the complaint is filed, but before an order or injunction is obtained, the township may post for 15 days a notice on the said housing premises or land unless the person or persons charged with discrimination agree in writing not to sell or rent during the pendency of the action or proceeding against such persons.

b. Any person who removes, covers or defaces the posted notice shall be fined not more than five hundred dollars (\$500.00) or shall be imprisoned not more than sixty (60) days, or both.

c. In order to prevent the rental or sale of the housing accommodation or land in violation of this section, the legal representative of the complainant may seek from a court of competent jurisdiction a temporary injunction or restraining order to prevent the disposition of the premises to other than the complainant during the pendency of the complaint alleging discrimination.

4-13.8 *State Remedies.* In no instance shall any complainant hereunder be precluded from pursuing his lawful remedies under the New Jersey Fair Housing Law, N.J.S. 18:25-4 et seq. or any other similar New Jersey statute.

4-14 Penalty.

4-14.1 *Maximum Penalty.* For violation of any provision of this chapter, any other chapter of this revision or of any other ordinance of the Township of East Brunswick where no specific penalty is provided regarding the section or sections violated, the maximum penalty shall, upon conviction of a violation, be a fine not exceeding five hundred dollars (\$500.00) or imprisonment for a period not exceeding ninety (90) days, or both.

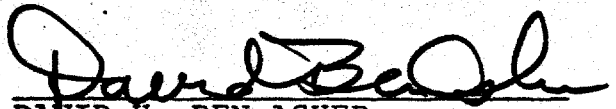
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26. (Continued)

BAUMGART & BEN-ASHER
Attorneys for Plaintiff

By



DAVID H. BEN-ASHER
A Member of the Firm

CERTIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

By TOWNSHIP COMMITTEE OF THE
TOWNSHIP OF EAST BRUNSWICK

DATED: _____