Earteret CA

Interrogatory demanding the Township Committee of the Township of South Brunswich, to provide income level and race statistics of housing, municipal employees, and public schools.

CAG026579

BAUMGART & BEN-ASHER Attorneys for Plaintiffs 134 Evergreen Place East Orange, New Jersey 07018 201-677-1400

MARTIN E. SLOANE
DANIEL A. SEARING
ARTHUR WOLF
Of Counsel
National Committee Against
Discrimination in Housing, Inc.
1425 H Street, N.W.
Washington, D.C. 20005
202-783-8150

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. Civil Action

INTERROGATORIES

Defendants

To:

ANDRE W. GRUBER, Esq. 1215 Livingston Avenue North Brunswick, New Jersey 08902

DEMAND is hereby made of the defendant TOWNSHIP COMMITTEE

OF THE TOWNSHIP OF SOUTH 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,

(For answers, please see Appendix attached hereto and incorporated herein)

spanish-speaking, other), citing source.

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

- 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
 - (b) \$15,000 to \$25,000
 - (c) \$25,000 to \$35,000
 - (d) Over \$35,000

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

Rental Range \$1:00 -Under \$150 -\$200 -\$250 & \$100 \$149 \$199 \$249 Over Type Efficiency One-Bedroom Two-Bedroom Three or more Bedrooms

- 5. Provide the total number of mobile homes in municipality that exist as conforming uses under current zoning ordinance.
- 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.
- . 7. Provide for each department in the municipality the number of municipal employees by job category, race, and annual salary or hourly wage.

 Income of families and unrelated individuals - measures of general tendency:

FAMILIES:

FAMILY INCOME

3479

<u>Total</u> \$48,457,950 Mean \$13,940 Median \$13,023

INDIVIDUALS

UNRELATED INDIVIDUAL INCOME

Total

Mean

Median

602

\$3,122,000

\$5186

\$4153

Population By Race

Total White Negro Indian Other Specified Other Other Non-14,058 13,533 418 6 89 12 Specified

Source 1970 U. S. Census

See #2 Attached.

3. (a) Single family homes under \$15,000 21 (b) \$15,000 - \$25,000 200 (c) \$25,000 - \$35,000 1417 (d) Over \$35,000 2064

• •		According to the control of the control		
Туре	Under	\$100-	\$150-	\$200-
	\$100	\$149	\$199	\$249 \$250 and over
Efficiency	None	None	2	None None
1-Bedroom	None	None	3.2	150 76
2-Bedroom	None	None	None	2 52
2-Bedrooms or more	None	None	None	None None

- 5. 485 Mobile Homes
- 6. None
- 7. See Attached #7.
- 9. See attached next page.
- 8. See Attached #8.
- O. Planned unit development request for zoning change by Paul Goldman, February 23, 1970 reviewed proposed site plan with Planning Board; June 14, 1971 met with Planning Board; filed suit in February 1973 attacking zoning ordinance; amended the suit in , Planning Board adopted Master Plan designating this area, as well as others, as future Planned Residential Development zones; litigation dropped by the plaintiff on

SOUTH BRUNSWICK TOWNSHIP PUBLIC SCHOOLS

OFFICE OF THE SUPERINTENDENT OF SCHOOLS

WEST NEW ROAD

MONMOUTH JUNCTION, NEW JERSEY 08852

Dr. James A. Kimple Superintendent

Telephone 201-329-8182

84 Oriental 8 East Indian Grand Total 4,174

PUPIL INFORMATION

School School	Grades	Race	
Cambridge Cambridge Road Kendall Park, 08824	K thru 6th	435 white 19 black 1 Spanish 13 Oriental 8 East Indian	Total=476
Constable	K thru 6th	353 white	
Constable Road Kendall Park, 08824		25 black 4 Oriental	Total=382
Crossroads Georges Road Monmouth Junction 08852	6 thru 8th	765 white 42 black 6 Spanish 8 Oriental	Tota1=821
Dayton	Grades		
Georges Road Dayton, 08810	3, 4, 5,	164 white 8 black 1 Spanish 2 Oriental	Total=175
Deans Georges Road R.D.1 Monmouth Junction, 08852	Grades K thru 3rd	152 white 10 black	Total=162
Greenbrook Roberts Road Kendall Park, 08824	K thru 6th	437 white 15 black 12 Spanish 32 Oriental	Total=496
High School Major Rd. & Kingston Lane	9 thru 12th	1,184 white 68 black	
Monmouth Junction, 08852		22 Spanish 6 Oriental	Total=1,280
Kingston Academy St. at Rt.27 Kingston, 08528	Special	22 white 1 Oriental	Total=23
Monmouth Junction Ridge Road, RD 1 Monmouth Junction, 08852	K thru 5th	322 white 14 black 5 Spanish	
		18 Oriental	Total=359
Totals 3,834 white 20	1 black 47	Spanish 84 Oriental	8 East Indian

#2

Answer	to	Question	7:
2 2 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	~~	* ~~~ ~~~~	

Employee Job Category	Race	Annual Salary or Hourly Wage
DITTINING DEPM		
BUILDING DEPT:	0-11	\$15,467.00
1 Chief Building Inspector	Cau.	
1 Building Inspector	Cau.	10,500.00
1 Part-time Bldg. Inspector	Cau.	\$5.00 per hour
1 Secretary	Mongoloid	6,789.00
ENGINEERING DEPT.:		
l Engineer	Cau.	\$23,926.00
l Asst. Engineer	Cau.	12,224.00
1 Engineering Aide	Cau.	7,941.56
1 Clerk-typist	Cau.	6,276.00
TREASURER'S DEPT.:		
l Asst. Treasurer	Cau.	9,290.00
1 Senior Acct. Asst.	Cau.	7,636.00
l Cashier	Cau.	6,035.00
TAX COLLECTION DEPT.:		
l Tax Collector and Chief		
Financial Officer	Cau.	20,353.00
l Bookkeeper-Clerk	Cau.	6,035.00
1 Acct. Clerk	Cau.	5,802.00
		and the control of th
l Cashier	Cau.	6,035.00
WATER AND SEWER COLLECTIONS:		일 : - 1 - 2 : 1 : 1 : 1 : 1 : 1 : 1 : 1 : 1 : 1 :
1 Deputy Collector	Cau.	7,060.00
1 Book. Machine Operator	Cau.	6,276.00
l Cashier	Cau.	6,035.00
1 Meter Reader	Cau.	7,946.00
SOCIAL SERVICES DEPT.:		
1 Social Services Director	Cau.	10,449.00
l Asst. to Director	Cau.	7,942.00
HEALTH DEPT.:		
l Sanitarian-Plumbing Insp.	Cau.	12,713.00
l Clerk II	Cau.	7,060.00
MUNICIPAL COURT:		
l Judge	Cau.	5,200.00
l Court Clerk	Cau.	9,662.00
1 Deputy Court Clerk	Cau.	8,259.00
l Dep. Court Clerk/Clerk-	0	6 520 00
Typist	Cau.	6,528.00
l Municipal Prosecutor	Cau.	\$1500.00 ret-
		ainer+\$100.00
		er case to maximum f \$3500.00
TOWNSHIP CLERK:		
1 Township Clerk (part-time)	Cau.	2,000.00
l Assistant Clerk	Cau.	6,789.00

		그램 작가 바랍니다 그를
ADMINISTRATION DEPT.:	0	620 500 00
1 Municipal Administrator	Cau.	\$29,500.00
1 Executive Secretary	Cau.	10,048.00
1 Secretary	Cau.	6,789.00
1 Receptionist	Cau.	5,802.00
ASSESSMENT DEPT.:		
1 Tax Assessor	Cau.	18,095.00
l Assistant Assessor	Cau.	10,449.00
T HODES CARLE HODGES OF		
RECREATION DEPT.:		연절되면 보고 있었다.
1 Recreation Director	Cau.	13,221.00
1 Clerk-Typist	Cau.	6,528.00
l Laborer	Cau.	\$3.82 per hour
		장이 발생하는 것이 가장 생각을 보고 있다. 생각 사람들은 사람들은 생각하는 것이 되었다.
POLICE DEPT.:		
1 Lieutenant	Cau.	16,730.00
1 Sergeant	Cau.	13,221.00
5 Sergeants	Cau.	14,434.00
3 Detectives	Cau.	13,750.00
9 Patrolmen	Cau.	12,750.00
3 Patrolmen	Cau.	11,650.00
2 Patrolmen	Cau.	10,850.00
2 Patrolmen	Cau.	9,250.00
l Civilian Dispatcher	Cau.	7,342.00
1 Civilian Dispatchers	Cau.	7,060.00
l Administrative Secretary	Cau.	9,290.00
1 Clerk-Stenographer	Cau.	7,942.00
PUBLIC WORKS DEPT.:		
1 Director	Cau.	22,014.00
1 Water Supervisor	Cau.	16,086.00
1 Sewer Supervisor	Cau.	15,467.00
3 Foremen	Cau.	12,729.00
1 Foreman	Cau.	11,294.00
1 Sewer Plant Operator	Cau.	11,294.40 11,294.40
6 Heavy Equip. Operators	Cau.	
l Heavy Equip. Operator	Cau. Cau.	10,441.60 10,046.40
l Equip. Maintenance Man	Cau.	10,441.60
l Heavy Equip. Operator	Black	10,441.60
<pre>l Heavy Equip. Operator l Heavy Equip. Operator</pre>	Cau.	9,672.00
1 Sewer Maintenance Man	Cau.	8,944.00
3 Equip. Operators	Cau.	9,672.00
1 Equip. Operator	Black	9,672.00
5 Laborers	Cau.	8,590.40
4 Laborers	Cau.	8,257.60
4 Laborers	Cau.	7,945.60
1 Laborer	Cau.	\$2.50 per hour
1 Secretary	Cau.	8,259.00
1 Clerk-Stenographer	Cau.	\$3.50 per hour
1 Clerk-Typist	Cau.	6,528.00

page three -

PLANNING AND DEVELOPMENT DEPT.:		
l Director	Cau.	\$19,571.00
1 Administrative Secretary	Cau.	9,290.00
1 Planning technician part-		
time	Cau.	\$4.50 per hour
BOARD OF EDUCATION:		Salary Range
7 Administrators	Cau.	\$23,500-
		31,650.00
7 Principals	Cau.	24,000.00 -
		29,500.00
3 Assistant Principals	Cau.	19,300.00 -
		25,300.00
145 Elementary Teachers	Cau.	
9 Elementary Teachers	Black	
1 Elementary Teacher	Oriental	9,200.00 -
		17,750.00
71 Secondary Teachers	Cau.	생물하는 하를 하는 것이다.
15 Secondary Teachers	Black	
2 Secondary Teachers	Spanish	9,500.00 -
		18,100.00
24 Special Services	Cau.	
2 Special Services	Black	9,200.00 -
		17,900.00
8 Librarians	Cau.	12,260.00 -
		16,800.00
6 Guidance Counsellors	White	
3 Guidance Counsellors	Black	10,500.00 -
		21,296.00
7 Nurses	Cau.	8,650.00 -
		15,800.00
7 Basic Child Study	Cau.	10,560.00 -
		20,398.00
2 Basic Child Study	Black	
8 Supplemental Teachers	Cau.	\$7.00 per hour
32 Custodians	Cau.	
5 Custodians	Black	- 6,175.00 -
		18,897.00
12 Custodians	Cau.	\$3.00-3.35 hour
Zuhuhchroom	Cau.	2,626.00 -
		2,951.00
3 Lunchroom	Cau.	\$2.19-2.30 hour
13 Bus Drivers	Cau.	\$3.30-4.30 hour
35 Secretaries, Clerk/Typists,		
Bookkeepers	Cau.	5,800.00 -
		10,720.00

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.

DIRECTOR OF PLANNING + DEUGAPHOUP

TOWNSHIP COMMITTEE OF THE BY TOWNSHIP OF SOUTH BRUNSWICK

DATED: 2 19/74