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**VIA E-MAIL & VIA UPS OVERNIGHT MAIL**

October 8, 2019

Eve of Yom Kippur 5780

The Honorable Susan Scarola, ALJ

Office of Administrative Law

9 Quakerbridge Plaza

P.O. Box 049

Trenton, New Jersey 08625

**Re: Alcantara, Leonor, Individually and as G/A/L for E.A. et. als.**

**v.**

**Hespie, David, Comm. of Ed., NJ State Bd. of Ed. & NJ Dept. of Ed.**

**OAL Dkt. No.: EDU-11069-2014 S / Agency Ref.: 156-6/14**

**EMERGENT REQUEST**

Dear Judge Scarola:

As Your Honor is aware this office represents the interests of Intervenor, Lakewood Township Board of Education/Lakewood School District ("Board" and/or "District"), in connection with the above-referenced matter.

While the New Year has commenced according to the Jewish "tradition" (year 5780), the "Books of Judgement" close on "Hoshana

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Rebbah” (the Great Hoshana/Supplication) which this year is Sunday, October 20, 2019,<sup>1</sup> and, as a result **on an emergent basis** I respectfully request an end to the financial fiasco, close this sorrid chapter, and, respectfully, request of Your Honor to issue Your ruling, or, in the alternative, an **EMERGENT ORDER** now before additional damage occurs.

The children of Lakewood Township, ALL of the children of Lakewood, need no longer “dangle” - - the “books” need to be closed on this matter that Mr. Lang, to his credit, insisted be done in 2014, some five (5) years ago.

As Your Honor may recall via an OPRA request filed by the undersigned in September 2018 the District, the public, and the Office of Administrative Law (“OAL”) *belatedly* learned that, **IN FACT**, the millions of dollars of loans extended to Lakewood since 2015, *according to the State*, were/are needed for the District to provide a “T&E” (thorough and efficient) education, to wit, the issue in Lakewood is a revenue problem – NOT a spending problem. (**EXHIBIT “A”**) [Same was cited, in part, in Your DECISION Denying Summary Judgement (Pages 10-11) dated

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<sup>1</sup> See, en.wikipedia.org/wiki/Hoshana\_Rabbah

January 8, 2019 and testified to State Monitors Michael Azzara and David Shafter, to their credit (**EXHIBIT “B”**).]

*Thereafter*, during the matter of Board of Education of Township of Lakewood v. New Jersey Department of Education, EDU-08386-19/Ref.: 142-6/19, the District learned only because of said action that the **\$36,000,000.00** (thirty six million dollar) L-O-A-N [READ – **not** Grant of \$30,000,000.00 (thirty million dollars) as promised] was similarly needed for a “T&E” education (**EXHIBIT “C”**).

We have said it *then, before, and now* that the “PONZI Scheme” must STOP. [Actually, *upon information and belief*, Your Honor so stated.]

However, it gets even “worse” for the children of Lakewood (and “better” for “our” case), to wit:

1. On Friday, September 20, 2019 came to a “stand still” in Lakewood (for both public and non-public) as, *upon information and belief*, there was not enough money to insure the smooth and continued operation of public and non-public transportation as the “LSTA” law was not continued despite assurances that same would

occur by the New Jersey Department of Education (“NJDOE”), the legislature, and the Governor.<sup>2</sup>

2. This past Friday, October 4, 2019 the District indirectly learned that the State, **again**, has acknowledged that even with a \$36,000,000.00 (thirty six million dollar) LOAN that the District does **NOT** have enough money/revenue to operate the 2019-2020 school year to provide a “T&E” education.

Specifically, see the attached e-mail exchange between Vincent J. Mastrocola, MBA, MPA, Director, Special Audits Unit, New Jersey Department of Education, Office of Fiscal Accountability and Compliance and other State stakeholders (that the undersigned confirmed today) (**EXHIBIT “D”**) that the State MUST forego “recovery” of \$3,939,095.00 (three million nine hundred thirty-nine thousand and ninety-five

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<sup>2</sup> As a result the District that provides by law transportation to mandated public and non-public students suddenly lost revenue of some \$4.5-\$6 million dollars as acknowledged by the State.

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dollars) of prior Audits to balance this year's  
Budget.

NOT to be a "naysayer" nor a "prophet of doom", however, I can,  
again, state with certainty based on what the *State itself knows* that even  
with the \$36,000,000.00 (thirty six million dollar) loan the District requires  
more money for this year.

The bottom line - - - an IMMEDIATE EMERGENT RULING from  
Your Honor is needed NOW, respectfully, that ONLY a legislative answer  
can solve the revenue issue herein.

TIME IS OF THE ESSENCE as the lack of stability and known  
reality (known by all) is adversely effecting morale of Lakewood's staff,  
and, most precious commodity - ALL OF THE STUDENTS OF  
LAKEWOOD TOWNSHIP.

Respectfully submitted,  
*Michael I. Inzelsbuch, Esquire*  
MICHAEL I. INZELBUCH, ESQ.

MII/sn

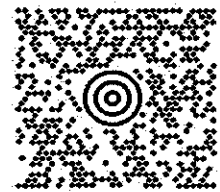
Exhibit Attachments

cc: Arthur Lang, Esquire (for Petitioners)  
Paul Tractenberg, Esquire (Participant)  
Jennifer Hoff, DAG (for Respondent)  
Geoffrey N. Stark, DAG (for Respondent)  
Edward Dauber, Esquire  
Laura Winters, Superintendent of LBOE  
Robert Finger, Interim Business Administrator/Board Secretary  
State Monitor David Shafter  
Board President & Honored Board of Education Members

DICTATED ONLY

MICHAEL INZELBUCH 1.0 LBS LTR 1 OF 1  
732-905-0325  
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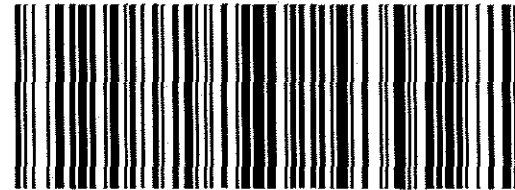
**SHIP TO:**  
JUDGE SUSAN SCAROLA, ALJ  
609-689-4051  
OFFICE OF ADMINISTRATIVE LAW  
9 QUAKERBRIDGE PLAZA  
MERCERVILLE NJ 08619-1241



**NJ 086 0-03**



**UPS NEXT DAY AIR 1**  
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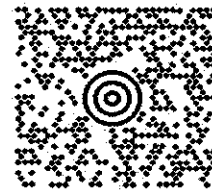
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LAKEWOOD NJ 08701

1.0 LBS LTR

1 OF 1

**SHIP TO:**

ARTHUR H. LANG, ESQUIRE  
732-609-5530  
918 EAST KENNEDY BOULEVARD  
LAKEWOOD NJ 08701-2100



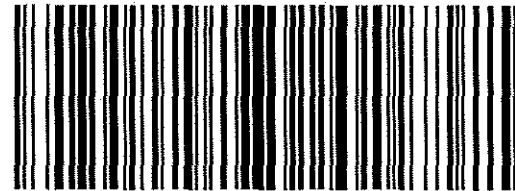
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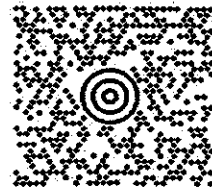
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LAKEWOOD NJ 08701

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**SHIP TO:**

PAUL TRACTENBERG, ESQUIRE  
973-353-5433  
123 WASHINGTON STREET  
NEWARK NJ 07102-3026



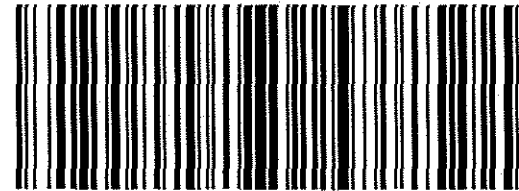
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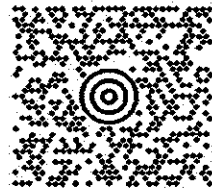
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1 OF 1

**SHIP TO:**

JENNIFER HOFF, ESQ.. - DAG  
609-633-8397  
STATE OF NEW JERSEY - DEPT OF LAW  
DIVISION OF LAW  
25 MARKET STREET  
**TRENTON NJ 08611-2148**



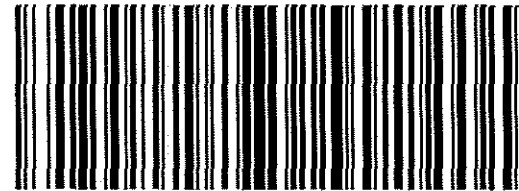
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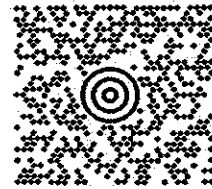
MICHAEL INZELBUCH  
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**SHIP TO:**

GEOFFREY STARK, DAG  
STATE OF NJ - OFFICE OF ATTY. GENERA  
DIVISION OF LAW  
25 MARKET STREET  
**TRENTON NJ 08611-2148**



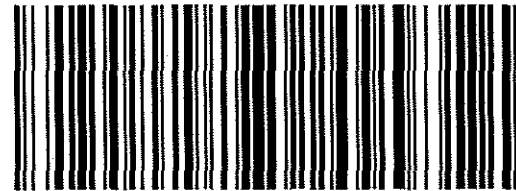
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