

Office of the City Clerk



SONIA L. GORDON, RMC
City Clerk

CITY HALL - 3RD FLOOR
155 MARKET STREET
PATERSON, NEW JERSEY 07505

OFFICE: (973) 321-1310
FAX: (973) 321-1311

April 4, 2022

opra+request-29602-39726158@requests.opramachine.com

Ms. Kathy

FILE NO: CA22:0356

Dear Ms. Kathy:

Enclosed please find the information you have requested from the City of Paterson under the Open Public Records Act (OPRA).

The response is in full and final satisfaction of your OPRA request submitted to the City Clerk's Office.

If you have additional questions, please submit a new OPRA request.

Sincerely,

A handwritten signature in cursive script that reads "Sonia L. Gordon".

SONIA L. GORDON
CITY CLERK

/th

Enc.

CA22:0356
Due Date: 3/1/2022

Twydaisha Hilbert

From: Kathy <opra+request-29602-39726158@requests.opramachine.com>
Sent: Thursday, February 17, 2022 10:34 AM
To: Opra Request
Subject: OPRA request - Requesting Letter from POLICE CHIEF IBRAHIM M BAYCORA attorney sent regarding his retirement benefits / suing the mayor.

Dear Paterson City,

I am Requesting the Letter PATERSON POLICE CHIEF IBRAHIM M BAYCORA attorney sent regarding his retirement benefits / suing the mayor.

This is a request for public records made under OPRA and the common law right of access. I am not required to fill out an official form. Please acknowledge receipt of this message.

Records requested:

Yours faithfully,

Kathy

Please use deliver records electronically via email to the below UNIQUE address for all replies to this request:
opra+request-29602-39726158@requests.opramachine.com

Is oprarequest@patersonnj.gov the wrong address for OPRA requests to Paterson City? If so, please contact us using this form:

https://opramachine.com/change_request/new?body=paterson_city

Disclaimer: This message and any reply that you make will be published on the internet. Our privacy and copyright policies:

<https://opramachine.com/help/officers>

View this OPRA request & responses online:

https://opramachine.com/request/requesting_letter_from_police_ch

Please note that in some cases publication of requests and responses will be delayed.

If you find this service useful as an OPRA custodian, please ask your web manager to link to us from your organisation's website.

RECEIVED
CITY OF PATERSON, NJ
2022 FEB 18 A 8:35
SONIA L. GORDON
CITY CLERK

Jacqueline Murray

Subject: FW: Chief Baycora

From: Aymen Aboushi
Sent: Monday, February 7, 2022 3:35 PM
To: 'Dylan Hastings' <dhastings@williamscedar.com>
Subject: RE: Chief Baycora

Mr. Hastings,

I am in receipt of your communications regarding Mr. Baycora. As an initial matter, as you know, I am the City's Attorney. It is inappropriate for you to contact the Mayor and the City's Business Administrator directly as represented parties. Please cease contacting these represented parties.

Second, to be clear, there are no "contract negotiations" as you claim. There is no employment contract with your client, and nor will there be.

Lastly, it is unfortunate that your client has resorted to thinly veiled threats of frivolous litigation to extract a payout from the City. There is ample just cause to terminate your client. Your client's unsatisfactory work performance is well documented, and we will have no choice but to catalog it in response to the patently frivolous litigation you threaten to undertake. Know that we intend on vigorously defending against these false allegations, and hold your client, as well as those who assist him, legally and financially responsible for asserting same.

The Mayor last week had a conversation in good faith to address your client's unsatisfactory work history and ending his tenure for the benefit of the City. His response of making frivolous claims, thinly veiled threats, and referencing non-existing contract negotiations is a serious error in judgment. I suggest that your client re-engage with the Administration in good faith to amicably end his tenure.

Be guided accordingly.

Aymen A. Aboushi, Esq.
Corporation Counsel
Director of Law, City of Paterson
155 Market Street
Paterson, NJ 07505
Tel: (973) 321-1366

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From: Dylan Hastings <dhastings@williamscedar.com>
Sent: Monday, February 7, 2022 1:31 PM
To: Andre Sayegh <asayegh@patersonnj.gov>; Kathleen Long <klong@patersonnj.gov>; Aymen Aboushi

<aaboushi@patersonnj.gov>

Subject: RE: Chief Baycora

Ms. Long,

Can you please advise when we may be able to speak about this? Thank you.

From: Dylan Hastings

Sent: Friday, February 4, 2022 9:16 PM

To: 'asayegh@patersonnj.gov' <asayegh@patersonnj.gov>; 'klong@patersonnj.gov' <klong@patersonnj.gov>; 'aaboushi@patersonnj.gov' <aaboushi@patersonnj.gov>

Subject: Chief Baycora

Dear Ms. Long,

As I indicated in my email from last night, my firm has been retained to represent Chief Ibrahim "Michael" Baycora in his contract negotiations with the City of Paterson.

As you know, Chief Baycora has been serving as the City's Chief of Police since February 1, 2020 and is currently working under his initial employment contract which nets him a yearly salary of \$218,000. This salary is not commensurate with the City's former Chief of Police or the Fire Department's Chief who both earn(ed) over \$250,000 annually. Given Chief Baycora's three decades of service and experience, there is no rational explanation for such a disparity. The City's January 31, 2022 offer to Chief Baycora does not represent an increase in Chief Baycora's salary or benefits and is thus unacceptable.

It is my understanding that you have requested that Chief Baycora resign for reasons not rising to the level of just cause. Given that Chief Baycora is 62-years-old, Muslim, and Turkish-American, any adverse employment action could result in a discrimination lawsuit. To avoid this, which would be in the best interest of all parties, Chief Baycora must receive a salary and benefits package comparable to that of his peers and commensurate with his experience. Alternative arrangements can also be explored to meet Chief Baycora's demands. At this time, Chief Baycora will continue to work under his current contract until he and the City come to terms.

Please feel free to contact me so we can discuss this matter in further detail.



Dylan Hastings
Attorney

WILLIAMS CEDAR LLC
One South Broad Street, Suite 1510 | Philadelphia, PA 19107
P 215.557.0099 | F 215.557.0673
www.williamscedar.com