

Opinions

Publication Is Law Journal

relies primarily on N.J. 10, which invalidates marriages contracted on September 1, 1939, and N.J. 3-1 et seq., which bans marriages based on breach of promise to marry.

plaintiff, a Polish immigrant with little knowledge of the English language and little social contact outside of her own family in the community, met defendant, a personable, sophisticated, well-to-do businessman. She was 48, married with two children. He was 25, single, and the father of two children. He seduced her and they left their parents and set up a new household. After about four years she capitulated.

They moved into an apartment and later a house. Three of their children of their prior marriage joined them, and grew up in an atmosphere not dissimilar to a normal family unit. The child reached adulthood and moved out of the household in 1970; he sold the house and purchased a smaller one for himself and his wife alone. The parties thereafter lived for 15 years.

It appears to have occurred during that time, but he kept his business affairs to himself and to all of his assets, including his residences, remained in his name. She knew little of his business affairs, and was

Continued on page 6, col. 1)

Opinion

PRACTICE OF LAW

Revised Practice of Law is R. 1:22-1(a). Approved by the Supreme Court, county or local bar association; Secretary of the Committee, the Courts, State House

forth in sufficient detail presented; with respect to whether practice of law and any other matter, including pertinent

Notice To Readers

This week's issue of the Law Journal is printed in two sections. Section Two contains the Cumulative Index to Volume 102 of the Law Journal, which covers July - December, 1978.

Opinions Approved For Publication

January 9 to January 12, 1979

NOTE: This summary of the holdings of opinions approved for publication has been prepared by the Administrative Office of the Courts for the information of the bar. Copies of the opinions have been sent to each county law library and, prior to publication in the Advance Sheets, any member of the bar may secure without charge a copy of the opinion in a particular case upon request to the Administrative Office of the Courts, room 349, State House Annex, Trenton 08625. Include the docket number in requesting copies of the opinions approved for publication. Requests for copies of all opinions cannot be filled.

SUPREME COURT

State of New Jersey v. Nicholas Stefanelli et al (A-126, decided January 10, 1979). It is harmless error, under facts here, to admit as substantive evidence of defendants' guilt co-conspirator's testimony of his guilty plea; testimony of guilty plea and its surrounding circumstances may properly be admitted under Evid. R. 20 and N.J.S.A. 2A:81-12 to affect co-conspirator's credibility as a witness. Appellate Division reversed; convictions reinstated. (Concurring and dissenting opinions.)

Alonzo W. Lawrence and James Simpson v. Bauer Publishing & Printing Ltd. et al (A-39, decided January 10, 1979). The judgment of the Appellate Division is reversed and that of the trial court reinstated substantially for the reasons expressed in the opinion of the dissenting judge reported at 154 N.J. Super. 271, 278. The libel action against its author is barred by the statute of limitations, N.J.S.A. 2A:14-3; the discovery rule has no application to this statute. Also, the facts do not warrant the invocation of the doctrine of equitable estoppel. (Concurring opinion.)

John Bradley, Jr. v. Henry Townsend Moving & Storage Company (A-32, decided January 9, 1979). Due deference will be given to the decisions and conclusions of

Highlights Of The New Code Of Criminal Justice

by Senator Martin L. Greenberg and Senate Judiciary Committee Aide John J. Tumulty, Esq.

This is the second of a series of five articles which will appear in the Law Journal on the new Code of Criminal Justice, which will go into effect in New Jersey on September 1, 1979. The first article appears in the Nov. 9, 1978 issue of the Law Journal, 102 N.J.L.J. 425. Senator Martin L. Greenberg (D-Essex) was sponsor of the Senate Bill, No. 738, which was signed into law (P.L. 1978 Ch. 95) by Governor Byrne on August 10, 1978.

PART I — OFFENSES INVOLVING DANGER TO THE PERSON CHAPTER 11 — CRIMINAL HOMICIDE

Chapter 11 covers homicide related offenses and divides criminal homicide into three separate offenses: murder, manslaughter and death by auto. 2C:11-2(b). The major changes involve the redefinition of the offenses of murder, the modification of the felony-murder doctrine, the addition of a limited defense in a felony-murder situation and the inclusion of aiding suicide as a criminal offense.

Redefinition of Murder

Under present New Jersey law, a homicide when accompanied by the required mens rea of "malice" constitutes murder in the first degree if the killing was done "deliberately," "willfully" and with "premeditation" or if the killing occurred under certain conditions during the commission of certain enumerated offenses. All other malicious homicides constitute murder in the second degree. See N.J.S.A. 2A:113-1 et seq. and Commission, supra, at p. 151. The Code abandons this terminology and classification scheme. Under the Code, criminal homicide constitutes murder if it is committed:

1. "purposely" — A person acts purposely if it is his conscious object to engage in conduct of a certain nature or to cause a certain result. 2C:2-2(b)(1).
2. "knowingly" — A person acts knowingly with respect to the nature of his conduct or the attendant circumstances if he is aware of the nature of his conduct or the existence of such circumstances or is aware of a high probability of their existence. 2C:2-2(b)(2).
3. during the commission of, or an attempt to commit, or flight after committing, robbery, sexual assault, arson, burglary, kidnapping or criminal escape.

Murder is punishable as a crime of the first degree and a person convicted of murder may be sentenced either to a term of 30 years, of which 15 must be served before parole may be granted, or to a maximum term of 30 years. Furthermore, such sentence may provide for an extended term of 30 years to life with 25 years to be served before parole may be granted. 2C:43-7.

(Continued on page 6, col. 4)

New Rule Amendment

SUPREME COURT OF NEW JERSEY

ORDERED that the attached amendment to R. 3:28 of the Rules Governing the Courts of the State of New Jersey is adopted to be effective January 15, 1979.

By the Court,
Dated: January 10, 1979
Richard J. Hughes, C.J.

Material in existing rule to be deleted is shown in brackets and new material to be added is shown in boldface.

RULE 3:28. PRETRIAL INTERVENTION PROGRAMS

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|---------------------|---------------------|
| (a) . . . no change | (c) . . . no change |
| (b) . . . no change | (d) . . . no change |
- (e) The Administrative Director of the Courts shall establish and maintain a Pretrial Intervention Registry for the purpose of determining applications, enrollments and the degree of completion thereof by a defendant in a program approved by the Supreme Court in accordance with paragraph (a). The Pretrial Intervention Registry shall contain such information and material as directed by the Supreme Court. No order to expunge or seal records of arrest after dismissal of a complaint, indictment or accusation under paragraph (c) or (d) shall bar the retention of material and information in the Pretrial Intervention Registry for the purposes of determining a defendant's prior applications to enrollments in and the degree of completion

Highlights Of The New Code Of Criminal Justice

(Continued from page 1)

Modification of the Felony-Murder Doctrine

Under common law and recent New Jersey case law a person is responsible under the felony-murder doctrine for a death resulting under certain circumstances, from his own action or the action of a co-felon. (See *State v. Canola*, 73 N.J. 206, 226 (1977)). Thus, under this doctrine a person committing a robbery would not be guilty of murder if a law enforcement officer in attempting to prevent the robbery accidentally shoots and kills an innocent bystander. The Code, however, rejects this limitation. Under the Code, any person engaged in the commission of one of the enumerated crimes is responsible for a casually related death of any person other than one of the participants which death results from the action of any person, including a third party. 2C:11-3a.(3).

Defense in Felony-Murder Situations

There is established in the Code a new affirmative defense to a charge of murder under the felony murder concept requiring a defendant, who was not the only participant in the underlying crime to establish:

1. He neither solicited nor aided in the commission of the killing;
2. He was not armed with a deadly weapon;
3. He had no reasonable ground to believe that any other participant was armed with a deadly weapon; and,
4. He had no reasonable ground to believe that any other participant intended to engage in conduct likely to result in death. 2C:11-3(a)-(d).

Aiding Suicide

Since 1971 (see N.J.S. 2A:85-5.1), an attempt to commit suicide has not been an offense in New Jersey. The Code continues this policy. However, under the Code, any person who aids another to commit or attempt to commit suicide is guilty of a crime of the second degree. 2C:11-6.

CHAPTER 12 — ASSAULT; RECKLESS ENDANGERING; THREATS

Chapter 12 covers assault and related offenses among which is an amalgamation of various statutes into an offense entitled "terroristic threats" which makes it a crime of the third-degree to commit an act of violence with the purpose to terrorize another or to cause public inconvenience by terror or alarm. Major changes include: the consolidation and generalization of those offenses; the requirement of actual bodily injury before an assault is committed and the introduction of a new concept, negligent assault.

Consolidation and Generalization of Assault Offenses

The basic aim of Chapter 12 is to merge present statutory offenses such as assault with intent to kill (N.J.S. 2A:90-2), atrocious assault and battery (N.J.S. 2A:90-1), mayhem (N.J.S. 2A:125-1) and fighting (N.J.S. 170-2) into a single offense entitled "assault" 2C:12-1. Assault under the Code is divided for purposes of sentencing into simple assault (disorderly or petty disorderly offense) 2C:12-1a, and aggravated assault (second to fourth degree). 2C:12-1b. Whether or not a particular fact situation constitutes simple assault or the more serious aggravated assault depends upon: the extent and seriousness of any injuries suffered by the victim; the type of weapon, if any, used in the offense; the status of the victim (i.e. a law enforcement officer in the performance of his duties); and the mental state of the offender (i.e. did he act "purposely," "recklessly" or "negligently").

Requirement of Actual Bodily Injury

At common law and under New Jersey case law the slightest touching or offensive contact constitutes an offense. See *State v. Maier*, 13 N.J. 235 (1953). The Code requires that some form of bodily injury result or be threatened in order for an assault offense to be committed. As defined by the Code, bodily injury "means physical pain, illness or any impairment of physical condition." 2C:11-1.

Negligent Assault

A new concept of negligent assault is introduced by the Code. A person who negligently causes bodily injury to another with a deadly weapon is guilty of an assault offense. 2C:12-1c(2).

A. Stanford (Stanford & Bruce; William H. Bruce, III on the brief).

Corbin City appeals from a judgment of the Division of Tax Appeals that vacated a \$3,800 real property assessment on a mobile home owned by John and Florence Bell. The judge of the Division held that the home was personal property, saying that the case stands "four square" with *Manhattan Trailer Ct. v. Twp. of No. Bergen*, 104 N.J. Super. 405 (App. Div. 1969).

The Bells are residents of Pennsylvania and use their 12' by 60' mobile home in Corbin City for weekends and vacations; it is located on a 75' by 150' piece of land owned by them. It rests on a concrete slab and is supported by columns of concrete blocks. It is further secured to the concrete pad by a series of chains connected to anchor bolts set into the concrete. Concealing these underlying supports was a "skirting" surrounding the space between the bottom of the home and the ground. The axels were still connected to the home although the wheels had been removed and were lying on the ground underneath. The home is connected into on-site water and septic systems. Electrical service is supplied by a direct line.

The community in which the trailer is located consists of six blocks on which there were from 35 to 40 homes. There were "quite a few" summer residents in the community and "quite a few" permanent residents. During the four years the Bells had owned the home, only one home moved off its pad; four new homes had come in. There were no transients.

Bell testified that the home was not the type of trailer one would unhook and travel in for short vacations. It would require a professional mover to detach it and it would take about eight hours to prepare it for moving. It was Bell's intention that the home was to stay where it was for the "foreseeable future." It is inferable that the other owners of mobile homes in the community had the same intention.

Held: This case is not "four square" with *Manhattan Trailer Court*, where the operation involved was a trailer court containing 50 spaces rented on a daily, weekly or monthly basis; the homes could be prepared for moving in one hour.

... a movable chattel loses its character as personalty and becomes a fixture and, thus, part of the realty . . . when it is: (1) actually affixed to the realty or something appurtenant thereto,

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other owners of mobile homes in the community had the same intention.

Held: This case is not "four square" with Manhattan Trailer Court, where the operation involved was a trailer court containing 50 spaces rented on a daily, weekly or monthly basis; the homes could be prepared for moving in one hour.

... a movable chattel loses its character as personalty and becomes a fixture and, thus, part of the realty . . . when it is: (1) actually affixed to the realty or something appurtenant thereto, (2) appropriated to the use or purpose of that part of the realty with which it is annexed, and (3) intended by the party making the annexation to be a permanent accession to the freehold. Westinghouse Broadcasting Co., Inc. v. Dir. Div. of Tax., 141 N.J. Super. 301, 305 (App. Div. 1976).

While in Westinghouse the structures (radio broadcasting towers) were affixed into the soil, the predominant theme of the case is that the intention in the placement of structure on the land is the "dominant factor" to be considered in making the determination of its character.

It is recognized that Nelson Cooney & Son, Inc. v. Twp. of So. Harrison, 57 N.J. 384, 389 (1971), said:

Mobile homes, however, are not taxable under present statutes in this state as either real or personal property.

The footnote in support of that statement cites Manhattan Trailer Ct., which has hereinabove been distinguished. Further, the statement in Nelson Cooney was dictum, for the issue as to whether the homes there involved were taxable as real property was not in the case, which related to the validity of a licensing ordinance that imposed a fee on a mobile-home park.

The Bells intended their mobile home to be a permanent accession to the freehold. It is therefore taxable as real estate and thus the Bells should share the cost of local government and its services with other taxpayers.

Reversed.

Actual fact situation constitutes simple assault or the more serious aggravated assault depends upon: the extent and seriousness of any injuries suffered by the victim; the type of weapon, if any, used in the offense; the status of the victim (i.e. a law enforcement officer in the performance of his duties); and the mental state of the offender (i.e. did he act "purposely," "recklessly" or "negligently").

Requirement of Actual Bodily Injury

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Negligent Assault

A new concept of negligent assault is introduced by the Code. A person who negligently causes bodily injury to another with a deadly weapon is guilty of an assault offense. 2C:12-1a(2).

CHAPTER 13 — KIDNAPPING AND RELATED OFFENSES: COERCION

Chapter 13 concerns kidnapping and other crimes involving the restraint of persons against their will, such as criminal restraint and false imprisonment. Major changes in this area are with respect to the definition of kidnapping and the treatment of interference with child custody.

Definition of Kidnapping

Under present law, any forcible movement of the victim may constitute a kidnapping. See State v. Kress, 105 N.J. Super. 514 (Law Div., 1969). In theory this could result in a kidnapping conviction for the forcing of a robbery victim to the rear of his store. In contrast, the Code requires that the victim must be removed from the place where he is found in order for a kidnapping to have occurred, except that the confinement or use of a person as a shield or hostage, or for ransom or reward will constitute kidnapping despite a lack of movement. 2C:13-1.

Interference with Custody

The Code makes interference with child custody (except where the actor believed it was necessary to protect the child from danger or where a child over 14 years of age consents, as long as no criminal purpose is involved) a separate offense. 2C:13-4. New Jersey statutory law presently contains no specific reference to such interference. The interest which the Code seeks to protect is "the maintenance of parental custody against all unlawful interruption, even when the child himself is a willing, undecieved participant in the attack on this interest of its parent." Commission, supra, at p. 188.

CHAPTER 14 — SEXUAL OFFENSES

Chapter 14 concerns sexual offenses. No aspect of the substantive criminal law in New Jersey has undergone more significant and dramatic change in the Code than the area of sexual offenses. The major change made by the Code in this area is the redefinition of sex crimes and the import thereof. Other changes include: the elimination of the requirement that the prosecution offer proof of victim resistance to secure a sexual crime conviction; the abandonment of the common law doctrine that a person cannot be found guilty of sexual offense if the victim was the person's spouse and that persons under a certain age are presumed incapable of committing certain sexual offenses; the strengthening of the recently enacted limitation on the admissibility of evidence relating to the victim's prior sexual history and the imposition of a mandatory term of imprisonment for repeat sex crime offenders.

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Highlights Of The New Code Of Criminal Justice

(Continued from previous page)

Redefinition of Sex Crimes

The most drastic change which the Code makes with regard to sexual offenses is the redefinition of those offenses. Traditional terms such as "rape" and "sodomy" will no longer be utilized to describe sexual offenses. Rather, under the Code, there are four basic sexual offenses: aggravated sexual assault (2C:14-2a), sexual assault (2C:14-2b), aggravated criminal sexual contact (2C:14-3a) and criminal sexual contact (2C:14-3b).

For an offense to be classified as either aggravated sexual assault (a crime of the first degree) or sexual assault (a crime of the second degree) sexual penetration is required. As defined by the Code, penetration includes vaginal and anal intercourse, cunnilingus, fellatio and insertion of the hand, finger or any object into the anus or vagina (2C:14-1c). The inclusion of digital penetration or penetration by an inanimate object represents a departure from the present rape and sodomy statutes which require penile insertion. See *State v. Bono*, 128 N.J. Super. 254 (App. Div., 1974). Under the Code, the depth of the insertion continues to be irrelevant. There is one exception to the aforementioned requirement that penetration is necessary for an offense to be classified as sexual assault; **an act of sexual contact (See 2C:14-1d) where the victim is under 13 is treated as sexual assault.**

In order for an offense to be deemed aggravated sexual contact (a crime of the third degree), or criminal sexual contact (a crime of the fourth degree), there must be an intentional touching by the victim or accused of the victim's or accused's intimate body parts for the purpose of either degrading or humiliating the victim or of arousing or sexually gratifying the accused. Sexual penetration is not required.

Assuming the required physical acts, the following four factors either separately or in combination are relevant in determining whether or not a particular fact situation is covered by the higher penalized aggravated classifications:

The amount of force and physical injury involved in the offense;

The ages of the victim and of the accused (i.e. consensual intercourse between a male of 15 and a female of 14 would not be an offense; consensual intercourse between a male of 20 and a female of 14 would constitute an offense);

The mental state of the victim [i.e. was the victim "physically helpless," "mentally defective" or "mentally incapacitated" (See 2C:14-1 g, h, i)]; and

The relationship of the accused vis-a-vis the victim [did the accused have supervisory or disciplinary power over the victim (i.e., teacher and student; prisoner and guard)].

It should be noted that these definitions are intended to cover both heterosexual and homosexual situations.

Elimination of the Requirement that Resistance by the Victim be Proved

Under present law, in order for the prosecution to obtain a conviction for a sexual offense, resistance on the part of the victim must be shown. See *State v. McPherson*, 135 N.J. Super. 203 (App. Div., 1975)). The Code specifically eliminates this requirement. 2C:14-5a.

Abandonment of the Common Law Doctrine That a Person Cannot Be Convicted of a Sex Crime If the Person's Spouse Is the Victim

At common law and as recently affirmed in New Jersey case law, *State v. Smith*, 148 N.J. Super. 219 (App. Div., 1977), a husband could not be prosecuted for raping his wife. The Code rejects this doctrine and specifically states that a person shall not be presumed incapable of committing a sexual offense because of marriage to the victim. 2C:14-5b.

Abandonment of the Common Law Presumption That Persons Under a Certain Age Are Incapable of Committing Sexual Offenses

At common law and under existing case law, *State v. LeFante*, 12 N.J. 505 (1953), there is an irrebuttable presumption that males under sixteen years of age are incapable of committing rape. The Code abandons this doctrine and specifically states that no person

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Strengthening the Limitation on the Admissibility of Complaining Witness' Previous Sexual Conduct
 Under the provisions of N.J.S. 2A:84A-32.1 et seq., enacted in 1976, limitations were placed on the admissibility, in sex offense cases, of evidence relating to the complaining witness' previous sexual conduct. The Code retains these limitations and further strengthens them by specifying that the complaining witness' previous sexual conduct is irrelevant "unless it is material to negating the element of force or coercion or to proving that the source of semen, pregnancy or disease is a person other than the defendant." 2C:14-7c.

Special Sentence of Imprisonment for Repeat Offenders
 In addition to the general penalties provided by the Code for crimes of the same degree as the sexual offenses set forth in Chapter 14, the Code also provides a minimum sentence of imprisonment of not less than 5 years which must be served prior to eligibility for parole for any person convicted of a second or any subsequent sex crime. 2C:14-6. The Court cannot, under this provision, make any non-custodial disposition of such an offender.

AUTHOR'S NOTE: As a result of the provisions of Chapter 14 and of the Code's repealer section (2C:98-2), certain sexual acts presently prohibited are decriminalized. Those acts include fornication (N.J.S. 2A:110-1), adultery (N.J.S. 2A:88-1), consensual sodomy (N.J.S. 2A:143-1), and incestuous conduct between adults (N.J.S. 2A:114-1).

PART II — OFFENSES AGAINST PROPERTY

CHAPTER 17 — ARSON, CRIMINAL MISCHIEF, AND OTHER PROPERTY DESTRUCTION

Chapter 17 covers arson and related offenses. The major changes in this chapter involve the gradation of arson for sentencing purposes and the consolidation of minor property offenses under a more general offense entitled "Criminal Mischief."

Gradation of Arson

The Code divides arson into aggravated arson, a crime of the second degree (2C:17-1a) and arson, a crime of the third degree (2C:17-1b). The factors for determining whether a particular factual situation falls into one or the other of these subdivisions involve the type of structure destroyed or imperiled and the degree of danger that the situation posed to the community. Commission, supra, at p. 204. Under all circumstances, however, any person who pays or accepts payment for the commission of arson is guilty of a crime of the first degree. Present New Jersey statutes dealing with arson-type offenses do little in the way of gradation.

Robbery is classified as a crime during the course of committing kill anyone, inflicts or attempts armed with a deadly weapon first degree.

The next article in this section (Related Offenses), 21 (Forgery Against the Family, Children, and Intimidation), 28 (Perjury and Obstructing Governmental Functions) and 33 (Offenses Against Public Safety).

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