



# Dictum

The newsletter of the NJSBA Young Lawyers Division

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## View From the Chair **Reflections and Looking Ahead**

*By Katrina Homel and Brandon Lee Wolff*



It is hard to believe we are already into the fall season—the end of the 2023-2024 bar year went by in a flash! It was wonderful to see many Young Lawyers Division (YLD) members at the end-of-the-year celebration (what a blast) and at the Annual Meeting and Convention! We've heard that the YLD party with Brian Kirk and the Jerks was a highlight of the Convention—if you missed it, make sure you plan to come down for the YLD party next year! Many congratulations to the YLD Award winners, who were Diana-Marie Laventure (Service to the Community), Chris Jackson (Service to the Bar), Ali Loprete (Professional Achievement), and Katrina Homel (Young Lawyer of the Year).

In reflecting on our time in the YLD, it is amazing to consider what we've accomplished as an organization. Since when we both first got involved, the YLD has made great strides in becoming a more welcoming orga-

nization, encouraging members to bring new ideas to the table, and creating opportunities for new members to find a path to a leadership role in the organization. By way of example, at a YLD meeting this spring, the Executive Committee decided during the meeting to create a new committee, the Sponsorship Committee, and two members who more recently became involved were appointed as committee co-chairs. In the short time of its existence, the committee has pulled in over \$9,500 in sponsorships for YLD events. This is just an example of how members brought new proposals to the table to keep moving the YLD forward. The sponsorship committee is already working on a formal prospectus to include different sponsorship levels in order to start a new tradition this year of having regular YLD sponsors.

This past year, we focused on making the YLD more accessible to and inclusive of all young lawyers. Earlier in the year, the YLD Executive Committee approved a Diversity, Equity, Inclusion, and Belonging (DEIB) Action Plan, which established a path forward for the YLD to continue to expand its DEIB efforts. The YLD strives to partner with diversity and affinity bar associations. The Philanthropy Committee organized a

volunteer event at the Community Food Bank of New Jersey in collaboration with the Garden State Bar Association and the Hispanic Bar Association Young Lawyers Committee. Additionally, the YLD co-sponsored events held by the larger Bar Association, such as the Diversity Summit and the Pride Flag Raising at the Law Center in June. This year the organization will build on these outreach efforts so that we can achieve our goals in being a welcoming organization for all attorneys.

In addition to our monthly meetings generally held in New Brunswick, the YLD also planned events all over New Jersey to encourage our members around the state to get involved. Our organization has consistently sought to deepen our connection with law students. In the fall, we had a meeting at the Camden campus of Rutgers Law School, and, but for a snowstorm, would have also met at the Newark campus as well. To reach lawyers in different regions, we held events such as the Stokelan Winery tasting in Medford, the Wills for Heroes event in Marlton, the Raptor Trust Earth Day volunteer event in Long Hill, and the Seton Hall basketball game in Newark. We also co-sponsored events with county bar associations to engage with young lawyers, including wellness walks with the Burlington County Bar Association, an “Ice Breaker” happy hour with the Ocean County Bar Association, a volunteer day at MEND with the Essex County Bar Association, and the Brew Ho Ho holiday party with the Middlesex and Monmouth bar associations. We held virtual events, including ’90s Trivia and a Tea and Mindfulness webinar, to include members who may not be able to attend our events in person. The Membership Committee drafted a new orientation PowerPoint so that new members can understand how to quickly get involved in the organization. No matter where you are in New Jersey, we hope you join us!

Our members are what makes the YLD a great place to grow and connect, and several members undertook projects that should be noted here. The Bylaws Committee reviewed the YLD Bylaws and shepherded through changes that clarify the Chair-Elect eligibility requirement and also added gender-neutral language. The Attorney Wellness Committee, new this year, proposed comments on a change to the New Jersey Rules of Court, led wellness discussions at YLD meetings, and organized a “lunch and learn” webinar on financial wellness. Additionally, the Committee reached out to the larger Bar Association so that the YLD was included in the confer-

ence, “What Happened When You Fell Apart?” The YLD also held a CLE event in partnership with the Government, Public Sector, and Public Interest Committee prior to a monthly meeting so that members could get CLE credit and attend the meeting all in one evening.

On top of all of these initiatives, the Nominating Committee reviewed applications for YLD leadership positions, the Awards Committee deliberated and decided who received the YLD awards this year, and the *Dictum* team was hard at work on our newsletter. Throughout the year, the Social Media Committee kept YLD members informed of what was happening in the YLD world. What a busy and productive year! Much appreciation goes out to the YLD members who were a part of making this year happen. We ended our year on a high note with the YLD celebration dinner on May 7, and then the YLD party and Annual Meeting in Atlantic City. A special shout out to the Seminars Committee and the YLD members who spoke on panels at the State Bar Annual Meeting and Convention!

This year we will be building on many of the initiatives we started in the last year. For example, we hope to continue our partnerships with county bar associations and bring more YLD events closer to our members throughout the state. Specifically, we would like to have our YLD meetings in new locations throughout the state. If your firm or county bar would like to host the YLD for one of our meetings, please contact the YLD Chair for 2024-2025, Brandon Lee Wolff (BrandonLeeWolff@gmail.com). The goal will be to have shorter meetings so that our members can then socialize in new locations throughout the state. We plan to have meetings in locations throughout the state (such as Montclair, Morristown, Red Bank, Mount Laurel and others) where people are excited to travel to in order to experience the town after our meeting. We will, of course, continue to make sure to offer a virtual option for all of our meetings. We understand that it can be difficult to get to every meeting and want to make sure everyone is able to participate whether in person or virtually.

We kicked off the year with a joint event between the YLD and the NJSBA Board of Trustees on Sept. 23 in Long Branch. This event allowed YLD and Board members to network with each other and gave YLD members the opportunity to learn from Board members about their path to their current role (which will be of particular interest for YLD members who may be aging out of the Division soon).

We are pleased to announce that the YLD will be having its first trip outside of New Jersey during our time in the YLD. We will be having a trip to the United State Supreme Court for a group admissions ceremony on Dec. 9. We have a room block and will have a reception in Washington, DC. The admissions program will be during an oral argument day so we have limited spots for this program. However, we hope that this will become a new annual tradition so that eventually everyone will be able to participate and get admitted to the United States Supreme Court Bar.

If you are not on the YLD Executive Committee but are interested in serving as an At Large Non-Voting Member on the Executive Committee, which requires also serving on a YLD committee, please reach out to YLD Chair, Brandon Lee Wolff (BrandonLeeWolff@gmail.com). There are many ways for you to get involved with the YLD—whether it is serving on a committee, writing an article or speaking on a panel. If you are interested in getting involved, please reach out to us.

Finally, both of us are serving on the Board of Trustees as YLD Trustees. Please feel free to contact either of us if there is an issue or concern affecting young lawyers that you would like us to bring to the attention of the Board of Trustees. Thank you for reading and we look forward to seeing you around the state! ■

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# Fourth Amendment Loopholes, DNA Collection, and Technology: Does Your Consent as a User of a Genealogy Website Override Another Person's Fourth Amendment Right?

By Jessy Leifer



In April of 2018, a remarkable event occurred that forever impacted criminal investigations. The Golden State Killer was finally arrested.<sup>1</sup> And, more interestingly, was the method law enforcement used to finally identify the man who murdered 13 people, raped 50, and terrorized a whole state for nearly three decades.<sup>2</sup> For the first time, law enforcement uploaded a DNA sample recovered from the crime scenes to a public consumer genealogy website, tracing the DNA to the perpetrator through comparison with distant genetic relatives who uploaded their own DNA, not for the purposes of catching criminals, but for simply tracing their family lineage.<sup>3</sup>

The Golden State Killer case was considered the first to use forensic genetic genealogy, a method which has since been used in some 545 cases as of Dec. 31, 2022.<sup>4</sup> It has been used to close cold cases like the Golden State Killer, to rapidly solve current cases like identifying the murderer of four Idaho college students in November 2022, as well as to finally name unidentified remains.<sup>5</sup> Some genetic genealogy sites like AncestryDNA and 23andMe prohibit law enforcement investigations using an ordinary user profile, while others like FamilyTreeDNA and GEDMatch are open about allowing law enforcement access to their databases, even without court approval or warrants.<sup>6</sup> Parabon NanoLabs, one of the most notable companies that provides DNA services to law enforcement agencies, has made more than 265 positive identifications in criminal cases, while the DNA Doe Project, a California nonprofit volunteer organization, has identified more than one hundred sets of remains.<sup>7</sup>

While it is hard to argue that the results of forensic

genetic genealogy are anything but good for society by catching criminals and identifying victims, some people argue that the use of public genealogy databases in aiding law enforcement is controversial because of the commercial aspect of the databases.<sup>8</sup> In other words, the user of the genealogy website uploads their DNA for the purposes of tracing their family history rather than catching criminals. One resolution to this complaint is the creation of DNA databases specifically designed to aid law enforcement, like the DNA Justice Foundation.<sup>9</sup> But that is just the tip of the iceberg when it comes to this controversial method.

Everyone, even a criminal suspect, has a Fourth Amendment right to privacy.<sup>10</sup> Although there are many exceptions to the warrant rule, there were few loopholes to the requirement when it came to the collection of DNA.<sup>11</sup> Warrant exceptions are based on the concept from the famous *Katz v. United States* case of whether a person “a reasonable expectation of privacy” in the item to be searched.<sup>12</sup> “The Fourth Amendment has traditionally focused on whether the government may penetrate the physical boundaries of a particular space,” and, generally, as the only way to collect a suspect’s DNA was to physically take the sample from the suspect themselves, it was difficult to argue that a person did not have a reasonable expectation of privacy in their person;<sup>13</sup> after all, the greatest trespass to one’s property is to one’s person.

However, forensic and genetic technologies were at best in their infancy when the reasonable expectation of privacy test was determined in 1967.<sup>14</sup> At that time, collecting and testing DNA was not possible, not to mention DNA comparison or identification methods.<sup>15</sup> In the nearly 60 years since that decision, even the most minute DNA samples can be collected and used to iden-

tify the purveyor of the sample.<sup>16</sup>

As with most technology, this has led to some uses for the public good – such as the identification of remains. The unknown soldiers at the Tomb of the Unknown Soldier are no longer unknown and have been returned to the families of the fallen servicemembers.<sup>17</sup> The remains of the late Russian Grand Duchess Anastasia have been identified and put to rest years of speculation as to whether she had actually survived the massacre of her family.<sup>18</sup> Likewise, other unidentified remains are now able to be identified, providing closure to families who had missing loved ones.<sup>19</sup>

Yet the Supreme Court has feared for years that the advancement of technology could corrode the Fourth Amendment.<sup>20</sup> In more recent decisions the Supreme Court has even shown it is aware that older privacy tests like the third-party doctrine imminently need revision as, “the same technological advances that have made possible non-trespassory surveillance techniques will also affect the *Katz* test by shaping the evolution of societal privacy expectations.”<sup>21</sup> In her concurring opinion in *Jones v. United States*, Justice Sonia Sotomayor famously questioned whether it may be “necessary to reconsider the premise that an individual has no reasonable expectation of privacy in information voluntarily disclosed to third parties. . . [in] the digital age, in which people reveal a great deal of information about themselves to third parties in the course of carrying out mundane tasks.”<sup>22</sup>

However, problems regarding the application of these tests and modern DNA technology are most apparent in cases like *South Dakota v. Bentaas*.<sup>23</sup> In that case, first and without using a warrant, South Dakota police sent a DNA sample to Parabon Labs, which was able to identify genetic relatives through forensic genetic genealogy, identifying the defendant as a suspect.<sup>24</sup> Then, again without obtaining a warrant, investigators went to the defendant’s residence and took garbage the defendant left outside her home for trash collection, retrieving a treasure trove of sources of DNA like cigarette butts, cotton swabs, Kleenex with hair, earplugs, water bottles, glass bottles, beer cans, and dental floss, from which they, without a warrant, extracted and analyzed DNA.<sup>25</sup> The state asserted the established third-party doctrine claim that people do not have a reasonable expectation of privacy in their trash once it could be exposed to a third party, but then extended it to conclude that people then do not have a privacy interest in the DNA they

leave on discarded items in their trash.<sup>26</sup>

The 2018 case *Carpenter v. United States* explained the existing privacy protection tests, the *Katz* reasonable expectation of privacy and third-party doctrine tests, and added a third, now known as the *Carpenter* test by holding that individuals have a reasonable expectation of privacy in their cell-site location information; therefore, third-party doctrine did not apply.<sup>27</sup> In that case, police requested and received, without using a warrant, call origination and call termination location data for the defendant’s calls during the four-month period when the string of robberies occurred from carriers MetroPCS and Sprint.<sup>28</sup> Law enforcement obtained 12,898 location points cataloging the defendant’s movements showing the location of the phone was at the stores on the date and times when they were robbed.<sup>29</sup> The trial and appellate court denied the defendant’s Fourth Amendment violation claims, concluding that the call logs were third-party information.<sup>30</sup> However, in a 5–4 decision, the Supreme Court held that law enforcement’s collection of historical cell-site location information from a cell-phone provider without a warrant was a Fourth Amendment violation, reasoning that “requests for cell-site records lie at the intersection of two lines of cases, both of which inform our understanding of the privacy interests at stake”:<sup>31</sup> those that address 1) a “person’s expectation of privacy in his physical location and movements,” otherwise known as the *Katz* reasonable-expectation-of-privacy test, and 2) those where the “Court has drawn a line between what a person keeps to himself and what he shares with others,” otherwise known as the third-party doctrine.<sup>32</sup> The Court outlined a new third test, the *Carpenter* test, for determining when law enforcement must use a warrant to access a collection of data, regardless of whether a third-party collected the data, like cell phone records, based on “1) its deeply revealing nature; 2) its depth, breadth, and comprehensive reach; and 3) the inescapable and automatic nature of its collection.”<sup>33</sup>

Some conservative leaning organizations, like the Heritage Foundation, argue that under the *Carpenter* test, law enforcement agencies are not required to obtain a warrant to use commercial DNA databases, arguing that the information provided by third-party genetics platform satisfies the first and second prongs of the *Carpenter* test, as they are extremely revealing and are deep, broad, and comprehensive, but fails to meet the third-prong as consumers choose to willingly upload

their genetic profile to the databases.<sup>34</sup> According to the Heritage Foundation, “If a consumer decides to voluntarily upload his information to GEDMatch, he knows, based on the terms and conditions of GEDMatch, that his information is public, and that anyone, including law enforcement, can query the database.”<sup>35</sup> Essentially, “under the “third-party doctrine,” individuals have no reasonable expectation of privacy in information an individual voluntarily shared with a third party.”<sup>36</sup>

These arguments are based on the rights of the user of the commercial DNA database - the person who themselves uploads their DNA for the purposes of tracing their family lineage.<sup>37</sup> Under this argument, a suspect does not have standing in a Fourth Amendment case as they have no privacy interest in their relatives’ DNA, nor DNA abandoned at a crime scene.<sup>38</sup> As the Heritage Foundation argues:

... Fourth Amendment rights are personal rights, not vicarious rights. As such, a criminal who leaves his DNA at a crime scene does not have standing under the Fourth Amendment to complain about what a distant relative—whom he likely never met, much less knows about—does with her own DNA or raw genetic profile.<sup>39</sup>

However, this is not an entirely accurate argument; after all, the issue is not how the database user uses their DNA, but rather how the police access and use the user’s DNA without a warrant. These arguments fail to address the personal rights of the criminal suspect and this misplacement of the issue fails to consider the true holder of the Fourth Amendment Right of privacy implicated by using consumer DNA databases.

Liberal organizations like the ACLU have argued that warrant exceptions like abandoned trash should not be extended to permit warrantless searches of DNA.<sup>40</sup> They also point to *Carpenter*, noting the Court’s reasoning prevents old rules that permit warrantless searches from automatically being extended to new police capabilities made possible by modern technologies.<sup>41</sup> Addressing the third prong of the *Carpenter* test, these organizations argue that people cannot avoid “shedding DNA on virtually every surface and object they touch” so DNA requires greater protection under the Fourth Amendment as leaving behind DNA is inescapable.<sup>42</sup> Although Chief Justice John Roberts emphasized that the *Carpenter* decision is a narrow one, the spirit and

reasoning behind the decision expanded the scope of protection for sensitive data in other domains, including one’s genetic information. *Carpenter* severely limits the applicability of the third-party doctrine when people maintain a reasonable expectation of privacy against surveillance even when their sensitive, personal data was voluntarily given up to a third party.<sup>43</sup>

This argument is more convincing and stands up among legal analyses. Not only does it meet the *Carpenter* standards as mentioned above, but it also focuses on the suspect as the holder of the privacy rights in question. The Supreme Court has consistently held that genetic data is presumptively private, indicating that “people not only have an expectation of privacy ‘in their physical cells, but also in the genetic information those cells contain.’”<sup>44</sup> Although Chief Justice Roberts emphasized that the *Carpenter* decision is a narrow one, the reasoning behind the decision expanded the scope of protection for sensitive data in other domains, including genetic genealogy.<sup>45</sup> *Carpenter* severely limits the applicability of the third-party doctrine even when their sensitive, personal data was voluntarily given up to a third party.<sup>46</sup>

Furthermore, it is unclear if there is a legal limit on what the government can do with DNA once it is collected. Even before modern technology, cases tested the boundaries of what was acceptable under the Fourth Amendment as it related to genetics. For instance, the 1927 case *Buck v. Bell* saw the Supreme Court uphold Carrie Buck’s forced sterilization by drawing a connection between genetics and crime.<sup>47</sup> In a more modern world, there is an argument that commercial DNA databases are a possible security threat, especially concerning given that a number of these sites have already been plagued with data breaches; without oversight, the possibilities of governments, both state and local, using this theory to obtain access to commercial DNA databases is endless and could have far reaching effects. It is not hard to imagine law enforcement access to these sites furthering racial profiling or other government overreach for instance.<sup>48</sup> Under the logic and purpose of the Fourth Amendment, an individual’s privacy interest in their genetic information should be constitutionally protected.<sup>49</sup> If police are allowed to obtain and sequence DNA without a warrant or oversight at any time, what stops them from grabbing every person’s trash, secretly obtaining DNA from it, and building some massive database with everyone’s DNA in it?<sup>50</sup>

Two states have already considered this issue and

passed laws in 2021 restricting law enforcement's access without a warrant to genetic genealogy DNA databases. Maryland's law requires police to have probable cause to get court authorization before beginning an investigation using information from such companies, and can only use them in instances of murder, rape, felony sexual offense, or criminal acts "involving circumstances presenting a substantial and ongoing threat to public safety or national security." Similarly, Montana limits the governments obtainment of consumer DNA unless it has "a search warrant issued by a court on a finding of probable cause or if the consumer whose information is sought waived their right to privacy."<sup>51</sup>

Regardless of whether a genealogy database is used for ancestry or law enforcement purposes, the use of forensic genealogy in solving crime and identifying criminals remains controversial, not just because of the user's intent, but also as it relates to the rights of the suspect and implicates the Fourth Amendment, the right to privacy, and the warrant requirement. A 2019 MIT Technology Review article reported more than 29 million consumers added their DNA to four leading commercial ancestry and health databases;<sup>52</sup> but if police are allowed to extract and sequence DNA without a warrant, there is little stopping them from obtaining sources of DNA without a warrant, secretly extracting DNA from it, and, criminal or not, circumventing the restrictions of and essentially shredding the Fourth Amendment, making the use of warrants moot.<sup>53</sup> And

while some argue that catching criminals is a good reason for restricting Constitutional rights, the fact remains that Constitutional rights exist for everyone and are legally protected, with no exceptions based on status of being a criminal suspect or defendant.<sup>54</sup> These rights cannot be tread upon or limited in such a way as to rule their protections moot, as is the case with forensic genetic genealogy at this time. As stated by Jennifer Lunch of the Electronic Frontier Foundation, the "language of the Fourth Amendment, which requires probable cause for every search and particularity for every warrant, precludes dragnet warrantless searches like these... A technique's usefulness for law enforcement does not outweigh people's privacy interests in their genetic data."<sup>55</sup> Without any regulations, forensic genetic genealogy allows law enforcement to completely circumnavigate Fourth Amendment protections of the fundamental right to privacy, the purpose of which is irrelevant.<sup>56</sup> As the ACLU has noted, "As our ability to decode DNA improves, the scope of sensitive, private information that is discernable will only increase. As it does, so will the need for strong Fourth Amendment protections to keep this information safe from warrantless searches and unconstitutional intrusion."<sup>57</sup> ■

*Jessy Leifer is a human rights defender and civil rights advocate, whose primary interest concerns the intersection of the Constitution, criminal justice system, and human rights.*

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## Endnotes

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57. *Id.*

# Estate Administration Should Influence Your Estate Planning: Practical Tips for Estate Planning and Administration

By Kaitlin Hackett



Estate administration and its nuances should influence how estate planning documents are drafted, just like how contract litigation should influence how contracts are drafted.

Estate administration is the process by which a decedent's estate is wound down and their property and assets distributed, either with or without a Last Will and Testament. When a client comes into your office seeking assistance with estate administration, remember first to acknowledge their loss. The only reason a person is seeking estate administration counsel is because someone close to them has died. As attorneys, we tend to jump right into completing the work, rather than seeing the people it is affecting.

The foundational step of estate administration and estate planning is identical, i.e., is understanding the assets of the decedent. All assets owned by the decedent at the time of their death must be inventoried. The decedent's last filed tax return is always a good starting point. Specifically, all account titling, such as Tenants in Common (TIC) or Joint Tenants with Right of Survivorship (JTWROS), and designations, such as Payable on Death (POD), Transfer on Death (TOD), or named beneficiaries. Property titling and the designations on accounts typically take that asset out of the probate estate. If the asset is not a probate asset, it will not be directed by the intestacy statute or the will that was meticulously drafted.

Then, make sure to review each article in the will. Every sentence, word, and sometimes even capital letter matters. Making sure you understand exactly what the will directs, and exactly what your client wants their will to accomplish, at the outset of representation will save you time later. Defined terms are a good starting point. For example, if a testator had four biological children, but only defines "children" in their will as three

children, you should absolutely be aware of that information before having to speak with inquiring beneficiaries. Obvious portions of the will like specific bequests, residuary distributions, and beneficiary names should be noted. However, some less obvious portions like a form tax article your firm always inserts or a simple "no bond" sentence will become very important to how you administer the estate and should be noted as well.

Perhaps the most adamant estate creditor of all, if applicable to your client's administration scenario, will be the Inheritance Tax Division of the State of New Jersey. In New Jersey, there is no estate tax, but there is inheritance tax depending on who receives a distribution of assets. Each beneficiary type is sorted into a "class" based on their relationship to the deceased as follows:

Class	Relationship to Decedent	Tax Due
Class A	Grandparent, Parent, Spouse, Child, Grandchild, Step-Child	Exempt, no tax
Class C	Brother/Sister, Son/Daughter in law	First \$25k – Exempt, no tax Next \$1,075,000 – 11% Next \$300,000 – 13% Next \$300,000 – 14% Over \$1,700,000 – 16%
Class D	Catch All Category – Everyone else	First \$700,000 – 15% Over \$700,000 – 16%
Class E	Charities	Exempt, no tax

See [nj.gov/treasury/taxation/pdf/other\\_forms/inheritance/010c.pdf](https://nj.gov/treasury/taxation/pdf/other_forms/inheritance/010c.pdf).

To determine who pays this inheritance tax, the will may state each beneficiary will be responsible to pay their own pro-rata share of tax, or it may state the tax will be paid by the estate. If the will is silent, New Jersey law requires each beneficiary to pay their share of taxes. In practice, each beneficiary paying their own taxes can get unwieldy, as they may not have the funds to pay any tax up front but then may also immediately spend their inheritance. This is especially true on POD/TOD accounts because the bank will typically issue a check directly to the beneficiary, rather than allowing the executor to filter the funds through the estate account while tracking the tax liability apportionments.

A huge tax saving estate planning tip is found under N.J.A.C. 18:26-6.7, which states life insurance that is payable to a Class C or Class D beneficiary is exempt from inheritance taxes. A huge time saving estate administration tip is to directly state in the will how each beneficiary is related to the testator (i.e. “my brother, Joseph” or “my neighbor, Nancy”), for inheritance tax calculation purposes. Contact information for each beneficiary is also more likely to be readily available from the testator and can be saved in the estate planning attorney’s file, whereas this information may be difficult for the executor to find after the testator has died.

This outline is not an all-inclusive guide on how to administer an estate or how to draft estate planning documents. However, these practice point overlaps are valuable to keep in mind. Happy drafting! ■

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# A High-Flying Philanthropy Event at the Raptor Trust

By Jessica R. Sciara and Christina N. Stripp



Each year, the Young Lawyers Division (YLD) hosts an environmental-themed community service event to celebrate Earth

Day. In the past, the YLD has conducted various river/park cleanups. This year, the YLD held its annual Earth Day philanthropy/community services event at the Raptor Trust in Millington.

The Raptor Trust is a 501(c)(3) charitable organization, and a premier wild bird rehabilitation center located within the Great Swamp National Wildlife Refuge. Established in 1983, the Raptor Trust provides care to orphaned and injured birds, education for the public, and exemplifies humane conduct and wildlife stewardship. The property includes an infirmary, educational facilities, and 70 cages and aviaries for recuperating birds. Once recuperated, the trust releases the birds to their natural habitats. Some birds, unable to be safely released to the wild, reside permanently at the property, providing an educational opportunity for visitors to observe approximately 40 different raptor species, including bald eagles, golden eagles, peregrine falcons, and American kestrel's, native to New Jersey.

In April, members of the YLD assisted the Raptor Trust in refurbishing an aviary for intended to rehabilitate large raptors, specifically to provide them with a safe space to practice and hone their hunting skills before being released back into their natural habitat. Our volunteers found the event extremely informative and rewarding, and we urge others to consider visiting or donating their time!

If you would like to be involved with the Raptor Trust, either as a volunteer or by donating, visit them at [theraptortrust.org](http://theraptortrust.org).

If you have any ideas for our next community service project or would like to get involved with the YLD's environmental community service events feel free to reach out to either of us, the Co-Chairs of the YLD's Earth Day Committee, at [cs@njlawfirm.com](mailto:cs@njlawfirm.com) or [jsciara@einhornlawyers.com](mailto:jsciara@einhornlawyers.com). ■

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Photo provided by YLD