

STATE OF NEW JERSEY  
DEPARTMENT OF LAW & PUBLIC SAFETY  
DIVISION ON CIVIL RIGHTS  
DOCKET NO.

Muriel Smith,	)	
	)	
	)	
Complainant,	)	Verified Complaint
	)	Received and Recorded
v.	)	Date: 9/21/2021
	)	Department of Law and Public Safety
Borough of Highlands,	)	Division on Civil Rights
	)	
Respondent.	)	
	)	
	)	

Complainant Muriel Smith alleges that Respondent Borough of Highlands committed acts of unlawful discrimination within the meaning of the New Jersey Law Against Discrimination (LAD) (N.J.S.A. 10:5-1 et seq.) when it denied her a reasonable accommodation and denied her full and equal accommodations, advantages, facilities, privileges, or services as a result. Specifically, Complainant alleges as follows:

1. Complainant resides at 99 Center Avenue, Rear Garage, Atlantic Highlands, NJ 07728.
2. Respondent operates a place of public accommodation located at 42 Shore Drive, Highlands, NJ 07732.
3. Complainant is a person with a disability as defined by the LAD (vision impairment).
4. Respondent hosts bi-monthly council meetings, among other meetings, that are open to the public. Such meetings are typically held during evening hours.
5. Complainant, a freelance journalist, has covered these meetings for more than 65 years.
6. Due to the COVID-19 pandemic, members of the public, including Complainant, were able to attend the meetings virtually via Zoom.
7. In or around December 2020, Complainant was diagnosed with a vision impairment that prohibited her from driving at night.

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8. In or around June 2021, Respondent discontinued its use of Zoom, and members of the public, including Complainant, were no longer able to attend public meetings virtually.
9. Because she is no longer able to drive at night due to her vision impairment, Complainant, on several occasions, including, but not limited to, May 18, May 19, May 20, June 2, and June 14, 2021, sent letters and emails to Respondent requesting the ability to continue using Zoom, or a similar platform, to attend public meetings virtually as a reasonable accommodation.
10. However, to date, Respondent has ignored Complainant's accommodation requests, and, as a result, Complainant has not been able to attend several public meetings.
11. By ignoring Complainant's accommodation requests, Respondent has effectively denied Complainant a reasonable accommodation and has denied her full and equal accommodations, advantages, facilities, privileges, or services as a result, in violation of N.J.S.A. 10:5-12(f).
12. The above LAD violations occurred in the County of Monmouth in the State of New Jersey.
13. Complainant has not instituted any other action, either criminal or civil, regarding this matter.

WHEREFORE, Complainant requests whatever relief is provided by law including, but not limited to, affirmative relief, and compensatory damages for economic loss, humiliation, mental pain and suffering.

Muriel Smith, of full age, hereby certifies that she is the Complainant named herein; that she has read and understands the foregoing Complaint and, that to the best of her knowledge, information and belief, the facts alleged in this complaint are true.

DocuSigned by:  
*Muriel Smith*  
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COMPLAINANT MURIEL SMITH