

GENOVA BURNS LLC

Angelo J. Genova, Esq. (005501979)

Brett M. Pugach, Esq. (032572011)

494 Broad Street

Newark, New Jersey 07102

(973) 533-0777

Attorneys for Plaintiffs,

William Connolly, Kevin Germann,

John Szczomak, and Antoinette Ravo

WILLIAM CONNOLLY, KEVIN GERMANN,
JOHN SZCZOMAK, and ANTOINETTE RAVO,

Plaintiffs,

v.

PASSAIC COUNTY REGULAR
REPUBLICAN ORGANIZATION, INC., and
CHAIRMAN JOHN TRAIER, in his capacity as
Chairman of the Passaic County Regular
Republican Organization, Inc.,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION:
PASSAIC COUNTY
DOCKET NO.:

CIVIL ACTION

VERIFIED COMPLAINT

Plaintiffs, William Connolly (“Connolly”), Kevin Germann (“Germann”), John Szczomak (“Szczomak”), and Antoinette Ravo (“Ravo”) (collectively “Plaintiffs”), by and through their attorneys, Genova Burns LLC, by way of Verified Complaint against defendants, Passaic County Regular Republican Organization, Inc. (“PCRRO”) and Chairman John Traier (“Chairman Traier”) (collectively “Defendants”), allege as follows:

PARTIES

1. Plaintiff, William Connolly, resides in Paterson’s 5th Ward (Election District 9). He is a Co-Chairperson/Municipal Leader of the City of Paterson Municipal Republican

Committee (“Paterson Republican Municipal Committee”)¹ and, consequently per the bylaws of the PCRRO (“PCRRO By-Laws”), a member of the Executive Committee of the Passaic County Regular Republican Organization, Inc. (“Executive Committee”). Plaintiff Connolly has been a member of the PCRRO for approximately 48 years. Having been elected as a Municipal Leader by the Municipal Committee, Plaintiff Connolly represents such membership, and in his role as a member of the Executive Committee of PCRRO, he more specifically represents the members of the Paterson Municipal Committee in matters associated with the affairs of the PCRRO, including the authority and decision to endorse party candidates and to authorize the use of the PCRRO slogan: “Passaic County Regular Republicans, Inc.,” among other things.

2. Plaintiff, Kevin Germann, resides in Paterson’s 2nd Ward (Election District 7), and is a member of the Paterson Republican Municipal Committee, which chose Plaintiff Connolly as a Municipal Leader to represent its interests as a member of the Executive Committee of the PCRRO, including with respect to the endorsement of Republican candidates for New Jersey Assembly in the June 2, 2015 primary election.

3. Plaintiff, John Szczomak, resides in Paterson’s 2nd Ward (Election District 6), and is a member of the Paterson Republican Municipal Committee, which chose Plaintiff Connolly as a Municipal Leader to represent its interests as a member of the Executive Committee of the PCRRO, including with respect to the endorsement of Republican candidates for New Jersey Assembly in the June 2, 2015 primary election.

¹ Plaintiff Connolly, as an elected member of the county committee, is also a member of the municipal committee wherein he resides, in accordance with N.J.S.A. 19:5-2.

4. Plaintiff, Antoinette Ravo, is a Municipal Chairperson of the North Haledon Republican Municipal Committee, and thus, per the PCRRO By-Laws, a member of the Executive Committee of the PCRRO, and is entitled to vote to endorse Republican candidates for the New Jersey Assembly in connection with the June 2, 2015 primary election.

5. Defendant, Chairman John Traier, is the Chairman of the Passaic County Regular Republican Organization, Inc., and thus, per the PCRRO By-Laws, a member of the Executive Committee of the PCRRO. As Chairman, he also presides over the PCRRO's meeting to select which candidates it will endorse in the primary election and is otherwise vested with such authorities and responsibilities of the office of Chairman, provided they are properly and legally executed per the bylaws of the PCRRO.

6. Defendant, Passaic County Regular Republican Organization, Inc. ("PCRRO"), is a non-profit corporation with a principal address of 1220 Hamburg Turnpike, Wayne, New Jersey 07470. PCRRO is the Passaic County Republican political party organization as defined under Title 19. In its role as a county political party, PCRRO is responsible for promoting the interests of Republican Party members within Passaic County including the authority and responsibility to grant authorization of the use of the party slogan, "Passaic County Regular Republicans, Inc." ("party slogan" or "line") to Republican candidates for public office in Passaic County, and specifically for legislative office in districts situated in Passaic County.

JURISDICTION AND VENUE

7. Jurisdiction is proper because Plaintiffs seek, among other relief, relief for Defendants' violations of N.J.S.A. 19:5-3.2 and N.J. Const., Art. I, Para. 6.

8. Venue is proper in this jurisdiction as the parties reside in the County of Passaic, State of New Jersey.

FACTUAL ALLEGATIONS FORMING THE BASIS OF THE COMPLAINT

9. Pursuant to N.J.S.A. 19:5-3.2, in relevant part:

The members of the county committee of a political party shall adopt a constitution and bylaws, ensuring fundamental fairness and the rights of the members of the county committee in the governance of the county party.

10. PCRRO's By-Laws are required to comport with N.J.S.A. 19:5-3.2, which statute intends to govern the affairs of the PCRRO. (See Exhibit A, PCRRO By-Laws.)

11. Article VI, Section E of the PCRRO By-Laws provides in relevant part:

The determination of which candidates for state and federal office shall be entitled to utilize the party slogan in a primary election shall be made by the Executive Committee in accordance with the same procedure specified above for candidates for countywide office.

(See Exhibit A, PCRRO By-Laws, Art. VI, Sec. E.)

12. In turn, Article VI, Section D of the PCRRO By-Laws provides in relevant part:

The determination of which candidates for county-wide office shall be entitled to utilize the party slogan in a primary election shall be made by the Executive Committee in accordance with the following procedure:

. . .

The Committee . . . shall determine their selection for each office by majority vote of those present.

(See Exhibit A, PCRRO By-Laws, Art. VI, Sec. D.)

13. Article IX, Section B of the PCRRO By-Laws provides in relevant part:

In the event these bylaws are silent as to procedure and or conduct, Roberts Rules of Order shall control.

(See Exhibit A PCRRO By-Laws, Art. IX, Sec. B.)

14. Pursuant to N.J.S.A. 19:23-14, March 30, 2015 is the deadline for candidates to file nomination petitions for the primary election, to be held on June 2, 2015 for the selection of legislative candidates in the 40th Legislative District (“District 40”). At the time of such filing, candidates are invited to place on their respective petitions, a slogan, not to exceed six words. N.J.S.A. 19:23-17. (See Exhibit B, attached sample Petition of Nomination for Primary Election.) Ten days later, the slogans of such candidates will be certified. N.J.S.A. 19:23-14.

15. Under N.J.S.A. 19:23-17, each primary election candidate may request to use a slogan or designation opposite his/her name, based on an endorsement of the petition of nomination, but such candidates are only permitted to use the name of an incorporated association, in this case PCRRO, if written consent of such incorporated association has been filed with the petition of nomination.

16. In accordance with N.J.S.A. 19:23-18, candidates for nomination to the same office can request to have their names grouped together or “bracketed” with a common designation or slogan.

17. County and municipal clerks will draw for ballot positions for primary election candidates on April 10, 2015, in accordance with N.J.S.A. 19:23-24. Upon information and belief, when drawing such positions, candidates that have petitioned to be “bracketed” together typically are drawn for ballot position by the Passaic County Clerk before non-bracketed candidates. Accordingly, such “bracketed” candidates receive the same “line” on the ballot.

18. N.J.S.A. 19:23-25 provides that the name of the slogan, not to exceed six words, for each primary election candidate will be printed next to the name of each candidate.

19. Pursuant to N.J.S.A. 19:14-1, the deadline for the preparation of the official June 2, 2015 primary election ballot for printing is April 13, 2015.

Structure of the PCRRO Executive Committee

20. Article III, Section A of the PCRRO By-Laws establishes the Executive Committee, and specifies that the Executive Committee shall be comprised of the following individuals:

- a. Chairperson
- b. Vice-chairperson
- c. 2 State Committee persons
- d. Finance Chair
- e. 16 Municipal Chairpersons
- f. All Republican Elected Officials Holding County-Wide Office²
- g. All Republican Elected Officials Holding Federal or State Office and Residing in Passaic County³

(See Exhibit A, PCRRO By-Laws, Art. III, Sec. A.)

21. Per the PCRRO By-Laws and upon information and belief, on February 21, 2015 there were 23 eligible ballots to be cast by the Executive Committee, representing 16 municipalities in Passaic County and 7 other elected/appointed members and “Republican elected officials” as stated above in ¶ 20. (See Exhibit A, PCRRO By-Laws, Art. III, Sec. A.)

February 21, 2015 PCRRO Executive Committee Endorsement Meeting

22. On February 21, 2015, a meeting was held at the Republican Headquarters in Wayne, New Jersey, in order for the Executive Committee to determine which candidates would secure the endorsement of the PCRRO, which endorsement permits such candidates to

² On February 21, 2015, the Passaic County Clerk, Kristin Corrado, was the only qualifying county-wide elected officeholder, per the PCRRO By-Laws.

³ On February 21, 2015, Assemblyman Scott Rumana was the only qualifying Federal or State elected officeholder residing in Passaic County, per the PCRRO By-Laws.

designate the party slogan "Passaic County Regular Republicans, Inc." in connection with the upcoming June 2, 2015 primary election.

23. Defendant, Chairman John Traier, the Chairman of the PCRRO, called the meeting to order without a roll call vote officially establishing a quorum or otherwise.

24. A motion was made at the meeting by Joanne Pituch, who was serving as a proxy for the Municipal Chairperson/Leader of Bloomingdale, Richard DuHaime, a member of the PCRRO Executive Committee, to endorse all of the incumbent candidates for Assembly in the seven Legislative Districts embracing or situated in Passaic County. Debate ensued in connection with this motion, specifically with respect to District 40, as, unlike the other six districts, there was an additional candidate, John Capo ("Capo"), seeking to be endorsed by the PCRRO as its candidate for New Jersey Assembly, in addition to the two incumbent candidates, Assemblyman Scott Rumana ("Rumana") and Assemblyman David Russo ("Russo") (collectively, the "Incumbent Candidates"), i.e. a total of three candidates seeking the PCRRO endorsement in District 40.

25. An amendment was made to amend this motion as to have the Executive Committee first consider only endorsing incumbent candidates seeking the PCRRO endorsement for Assembly in the six "uncontested" Legislative Districts, and to consider the District 40 Assembly endorsement question separately given that there were three candidates for Assembly seeking the PCRRO endorsement, and the PCRRO Executive Committee intended to endorse two Assembly candidates per Legislative District in the June 2, 2015 primary election.

26. During the debate regarding the selection of candidates to be endorsed by PCRRO for Assembly in District 40, an incumbent candidate, Scott Rumana, insisted on being

considered in combination with David Russo, the other incumbent; specifically, that the two Incumbent Candidates be considered as being “bracketed” for the purpose of the vote to be taken by the PCCRO Executive Committee to decide which Assembly candidates were to secure its endorsement in the District 40 June 2, 2015 primary election.

27. This demand led to a debate over the question of whether such process was fair as there were three candidates seeking the PCRRO endorsement, and whether such a process effectively: (a) improperly compelled members of the PCRRO Executive Committee to vote for a candidate other than of their personal choice; (b) improperly prohibited a PCRRO Executive Committee member from abstaining from voting; (c) improperly banned a PCRRO Executive Committee member from “bullet voting” (voting for one candidate); and (d) improperly prohibited a PCRRO Executive Committee member from writing in a candidate’s name.

28. Upon the conclusion of the debate and after a generalized oral consensus, Chairman Traier decided that each member of the Executive Committee would be required to vote for two candidates, and consequently would be prohibited from voting for only one candidate instead of two (“bullet voting”). (See Exhibit C, attached Email, Traier to Connolly, February 22, 2015, 4:44 P.M.)

29. Based on his approximately 48 years of experience as a member of the PCRRO, and his participation in numerous elections to select candidates for endorsement, Plaintiff Connolly recalls no instance prior to February 21, 2015 where PCRRO had ever prohibited “bullet voting”, i.e. voting for a single candidate seeking the PCRRO endorsement.

30. Upon information and belief, prior to the morning of the vote, Chairman Traier had assured another Municipal Leader that they would be permitted to bullet vote. (See Exhibit D, attached Letter from Del Sardo to Traier, Feb. 21, 2015, at p.2.)

31. Enforcing his decision, Chairman Traier commenced to conduct the vote to determine which candidates would be selected for endorsement by the PCRRO, and thus entitled to use the party slogan in the upcoming June 2, 2015 primary election for Assembly in District 40.

32. A ballot box was situated at the front of the room close to where Chairman Traier was presiding over the meeting and conducting the election.

33. Executive Committee members were directed to come up individually to obtain a ballot, fill it out, and cast it into the ballot box. Despite the fact that the vote was to be held by secret ballot, members voted without the benefit of privacy protections such as a curtain, a booth, partitions, or other means to assure the privacy of the vote by paper ballot.

34. Based on Plaintiff Connolly's personal experience and best recollection, representatives of candidates seeking endorsement and/or the candidates themselves had historically been permitted to be present when the ballots were cast and counted. Yet, on February 21, 2015, two of the candidates seeking endorsement for Assembly in District 40 were not permitted to be present. In addition, at the conclusion of the vote, Chairman Traier counted the ballots, recorded the number of votes, opined on the validity of ballots, and determined the outcome of the election without the presence of an independent observer.

City of Paterson Executive Committee Members' Vote

35. Each Executive Committee member cast their respective ballot before the Paterson Executive Committee members were directed to cast their ballot. The Paterson vote

was conducted last purportedly due to the fact that it had three Municipal Leaders⁴ – William Connolly, Ramon Leon (“Leon”), and Carlos Pagan (“Pagan”) – representing the City of Paterson Republican Municipal Committee (“Paterson”), whose votes were contemplated, as per past practice, to be cast as “one” requiring their collective deliberation and consensus.

36. Based on Plaintiff Connolly’s personal experience of approximately 48 years participating in prior meetings for the selection of candidates to be endorsed in a primary election by the PCRRO, historically, when the Executive Committee voted which candidates to endorse, each municipality was entitled to one vote. This practice included having only one vote for the City of Paterson, despite the fact that it had three municipal co-chairpersons who are entitled to vote as members of the Executive Committee.

37. Pagan and Plaintiff Connolly, representing a majority of the three Municipal Chairpersons from Paterson, decided that Pagan would cast the vote on behalf of Paterson, which Plaintiff Connolly agreed to based on the understanding that one of the votes would be for Capo.

38. When Pagan went to the front of the room to cast a ballot on behalf of Paterson, Rumana objected and a loud commotion, disturbance, and argument ensued. As the dispute over how to cast Paterson’s vote could not be resolved, Chairman Traier decided to permit all three Municipal Chairpersons for Paterson (Connolly, Leon, Pagan) to vote individually, notwithstanding the fact that such procedure was unprecedented and contrary to the PCRRO By-Laws requiring one vote per Republican municipal committee situated in Passaic County. (See Exhibit A, PCRRO By-Laws, Art. VI, Sec. D(2); Art. III, Sec. A.)

⁴ Prior to the commencement of the vote, the three Municipal Chairpersons from Paterson were temporarily removed from the meeting, and made to stand outside in order to attempt to resolve the issue of how the Paterson vote would be cast, due to the fact that it had three municipal chairpersons, but only one vote could be cast.

39. Accordingly, and thereupon, Leon, Pagan, and Connolly were each instructed to, and did in fact fill out their own separate ballots. After each filling out their own separate ballots, they were instructed to, and did in fact each individually hand their ballots to Chairman Traier, rather than placing them in the ballot box, as all of the other Executive Committee members had done.

40. Upon receiving the three ballots cast by the members of the Executive Committee from Paterson, Chairman Traier opened and read to himself each ballot. Chairman Traier then picked up one of the ballots and placed it into the ballot box with the ballots from the other municipalities and elected officials.

41. With respect to the other two ballots that he did not place into the ballot box, Chairman Traier claimed that: (a) one of the ballots contained votes for the same two candidates as the ballot that he had placed into the ballot box, and (b) the other ballot indicated a vote for only one candidate instead of two, and therefore such ballot would be rejected and not be counted.

Plaintiff Connolly's Vote

42. Plaintiff Connolly, as a member of the Executive Committee, plays a representative role. His ability to vote should be unfettered and he should be free to vote for candidates seeking the PCRRO endorsement of his choice, as a matter of his fiduciary duties to those whom he represents, including plaintiffs Germann and Szczomak, and on behalf of other members of the Paterson Republican Municipal Committee. Plaintiff Connolly also believes that his right to vote for the candidate of his choice seeking the PCRRO endorsement is protected by both the State and Federal Constitutions.

43. Plaintiff Connolly desired to vote for candidate John Capo, and did not want to vote for or otherwise associate himself with the Incumbent Assembly Candidates (Rumana and Russo) who also sought the PCRRO endorsement and were on the ballot.

44. Plaintiff Connolly voted only for Capo and did not vote for either of the Incumbent Assembly Candidates.

45. While counting the ballots for Paterson, the ballot cast by Plaintiff Connolly was rejected by Chairman Traier because Plaintiff Connolly only voted for one person, "Capo", as he chose to not support the Incumbent Assembly Candidates, Russo and Rumana, also seeking the PCRRO's endorsement.

46. Plaintiff Connolly, who suffers from a longstanding hearing impairment, also complained and was offended to learn that his vote was rejected unfairly, having not fully comprehended the import of the decision by Chairman Traier requiring that members must vote for two candidates and which prohibited bullet voting. (See Exhibit E, attached Email, Sent by Connolly, Feb. 22, 2015, 10:58 A.M.); Exhibit D, attached Letter from Del Sardo to Traier, Feb. 21, 2015, at p.2.)

47. Plaintiff Connolly thereafter contested and challenged the vote. (See Exhibit C, attached Email, Connolly to Traier, February 23, 2015, 10:02 A.M.; Exhibit D, attached Letter from Del Sardo to Traier, Feb. 21, 2015, at p.2.) Plaintiffs incorporate by reference, as if set forth herein, Plaintiff Connolly's challenge to the conduct of the election, (see Exhibit D, attached Letter from Del Sardo to Traier, and email, entitled "My Account of the P.C.R.R.O. Rigging the District 40 Vote," (see Exhibit E, attached Email, Sent by Connolly, Feb. 22, 2015, 10:58 A.M.), which Plaintiff Connolly forwarded to Chairman Traier. (See Exhibit C, attached Email, Connolly to Traier, Feb. 23, 2015 at 8:13 A.M.)

Tally of the Ballots

48. At the February 21, 2015 Executive Committee meeting, Defendant Chairman Traier initially announced that 21 ballots had been recorded as received. However, after PCRRO Secretary, Dawn Cody, informed Chairman Traier that 23 ballots should have been accounted for, Chairman Traier recounted the ballots and announced that 23 ballots had been cast.

49. Thereupon, the 23 ballots were counted with Chairman Traier announcing the vote total as follows.

Rumana:	23 votes
Russo:	12 votes
Capo:	11 votes

Chairman Traier announced that the Incumbent Candidates, Rumana and Russo, had secured the endorsement and authorization to use the slogan of the PCRRO. (See Exhibit C, attached Email, Traier to Connolly, February 22, 2015, 4:44 P.M.)

Pagan's Vote and Improper Rejection of Plaintiff Connolly's Vote

50. Upon information and belief, Carlos Pagan voted for Rumana and Capo.

51. Upon information and belief, Chairman Traier recorded the vote cast by the Paterson Republican Municipal Committee as having been cast for Rumana and Russo.

52. Had Connolly's vote for Capo been properly included in the vote total, and Pagan's vote properly recorded as having been cast for Rumana and Capo, and not for Russo, Capo would have received 2 votes out of 3 from the members of the Executive Committee from Paterson (Pagan and Connolly). Thus, Capo would have received a majority of votes from the Paterson delegation, entitling him to one additional vote. In turn, Russo should have

received one less vote, as he would not have received a majority of votes from the Paterson delegation. Therefore, the vote totals would have been as follows:

Rumana:	23 votes
Capo:	12 votes
Russo:	11 votes

As such, Rumana and Capo, but not Russo, would have secured the endorsement and been entitled to use the PCRRO slogan.

53. Even without counting Plaintiff Connolly's vote, Russo would not have been entitled to receive a vote from the Paterson delegation, as he would not have received a majority of votes. Rather, based on Pagan's vote for Capo, Russo could not have received more than 1 vote, which would have been the same number of votes received by Capo. As neither Russo nor Capo would have received a majority under this scenario, neither would have received a vote from Paterson, and the vote totals would have been as follows:

Rumana:	23 votes
Russo:	11 votes
Capo:	11 votes

54. Given the discrepancy in the number of votes and the improper rejection of Plaintiff Connolly's vote, it is necessary for the Court to intervene and ensure that such ballots were properly cast and counted in order to ensure that the PCRRO By-Laws have not been violated, that the statutory protections for fundamental fairness and rights of members in the conduct of county party organizations are enforced, and that the Federal and State Constitutional Protections to be accorded to Plaintiffs are not abridged.

FIRST COUNT

VIOLATION OF N.J.S.A. 19:5-3.2 AND THE BY-LAWS

55. Plaintiffs repeat and reallege the allegations set forth in the foregoing paragraphs of this Complaint as if set forth more fully herein.

56. PCRRO was required to adopt and abide by bylaws that ensure fundamental fairness and the rights of members of the county committee in the governance of the county party pursuant to N.J.S.A. 19:5-3.2.

57. PCRRO adopted the By-Laws which are silent with respect to specific procedures concerning the vote in connection with the determination of which candidates to endorse for state office.

58. Pursuant to its own By-Laws, and in the absence of specific procedures within the By-Laws, PCRRO was required to abide by the procedural requirements set forth in Roberts Rules of Order. (See Exhibit A, PCRRO By-Laws, Art. IX, Sec. B.)

59. Chairman Traier purported to conduct the vote by “secret ballot” to determine which candidates for Assembly in District 40 would receive PCRRO’s endorsement and be permitted to use its slogan in the upcoming June 2, 2015 primary election. The procedures employed at the February 21, 2015 Executive Committee meeting were by no means “secret” as they were fraught with infirmities and compromised the fairness of the proceeding in its totality.

60. Chairman Traier ruled that Executive Committee members were compelled to vote for two candidates seeking the endorsement of the PCRRO for District 40 at the February 21, 2015 Executive Committee meeting. The PCRRO By-Laws provides only that a decision be made by a majority vote of the Executive Committee, (See Exhibit A, PCRRO By-Laws,

Art. VI, Sec. E; Art. VI, Sec. D(2)), makes no provision for such a requirement and is otherwise silent with regard to same. To the extent Robert's Rules of Order then apply, having been incorporated by reference therein, any motion for and/or adoption of a rule requiring members to affirmatively vote for two candidates, and to prohibit bullet voting for a single candidate is out of order, and thus null and void under Robert's Rules of Order (11th ed.), Ch. XIII, § 45, p.413:1-9, and in violation of the PCRRO By-Laws.

61. Chairman Traier and the PCRRO's decision to reject Plaintiff Connolly's ballot for failing to vote for a second candidate whom he did not support violates Roberts Rules of Order (11th ed.), Ch. XIII, § 45, p.415:35-416:9, as incorporated by reference in PCRRO's By-Laws. (See Exhibit A, PCRRO By-Laws, Art. IX, Sec. B.)

62. Plaintiff Connolly's ballot was the only ballot rejected.

63. PCRRO and Chairman Traier's ruling, violated Plaintiff Connolly's rights by prohibiting bullet voting and impermissibly forcing Plaintiff Connolly to vote for and associate with candidate(s) whom he did not support, and then punishing him for attempting to vote for the candidate of his choice.

64. Plaintiffs Kevin Germann and John Szczomak, as members of the Paterson Republican Municipal Committee, which entity chose Plaintiff Connolly to serve as a Municipal Chairperson and as a member of the PCRRO Executive Committee, are thus represented by Plaintiff Connolly. As such, their rights were also violated by the actions of Defendants PCRRO and Chairman Traier when they violated N.J.S.A. 19:5-3.2 and PCRRO's By-Laws, and rejected the ballot of one of the Paterson Republican Municipal Committee's chosen representatives.

65. Plaintiff Antoinette Ravo is the Municipal Chairperson from North Haledon and a member of the PCRRO Executive Committee. As a member of the Executive Committee, Ravo is entitled to participate in the vote to determine which candidates would be endorsed by the PCRRO for the June 2, 2015 primary election. The actions of the PCRRO and Chairman Traier violate the rights of Plaintiff Ravo because, as a member of the Executive Committee, she is thus entitled to have a vote held in accordance with the requirements of the PCRRO By-Laws and N.J.S.A. 19:5-3.2; yet, the vote held on February 21, 2015 with respect to Assembly candidates for District 40 failed to comply with such standards.

66. Plaintiffs rights were further violated by the actions and conduct of Defendants in awarding the PCRRO's endorsement to candidate Russo, and not to candidate Capo, despite the fact that Russo had failed to receive a majority vote of the Paterson delegation, and thus failed to receive a majority vote of the Executive Committee, and despite the fact that candidate Capo did receive a majority vote of the Paterson delegation, and thus received the majority vote of the Executive Committee.

67. PCRRO and Chairman Traier's actions thus violated the "fundamental fairness" and "rights of members" requirements required to be embedded in the PCRRO By-Laws pursuant to N.J.S.A. 19:5-3.2, and failed to comply with the requirement in the PCRRO By-Laws requiring that selection of candidates to be endorsed by the PCRRO be by majority vote.

WHEREFORE, Plaintiffs demand:

(a) a finding that Defendants PCRRO and Chairman Traier violated N.J.S.A. 19:5-3.2 by failing to ensure fundamental fairness and the rights of members when they failed to abide by the procedures set forth in its By-Laws and the procedures set forth in Robert's Rules of Order referenced therein; and

(b) a finding that Defendants PCRRO and Chairman Traier violated N.J.S.A. 19:5-3.2 by failing to ensure fundamental fairness and the rights of members when they required Plaintiff Connolly to vote for and associate with members that he did not support and when they did not count his ballot; and

(c) a finding that Defendants PCRRO and Chairman Traier violated N.J.S.A. 19:5-3.2 by failing to ensure fundamental fairness and the rights of members when they awarded the endorsement to Russo, despite the fact that he had not received a majority of votes of the Paterson delegation, and thus had not received a majority vote of the Executive Committee, as required by the PCRRO By-Laws; and

(d) injunctive relief temporarily enjoining and restraining Defendants PCRRO and Chairman Traier from discarding or otherwise destroying any ballots used in connection with PCRRO's vote concerning the determination as to which candidates for Assembly in District 40 should be entitled to use the slogan of PCRRO until such time as this matter has been heard; and

(e) injunctive relief temporarily enjoining and restraining Defendants PCRRO and Chairman Traier from endorsing any candidates for Assembly from District 40, or otherwise allowing any such candidates to use the slogan of the PCRRO until such time as this matter has been heard; and

(f) injunctive relief preliminary and permanently enjoining and restraining Defendants PCRRO and Chairman Traier from discarding or otherwise destroying any ballots used in connection with PCRRO's vote concerning the determination as to which candidates for Assembly in District 40 should be entitled to use the slogan of PCRRO until such time as this

matter has been resolved at a hearing and as determined by the Passaic County Superior Court;
and

(g) injunctive relief preliminarily and permanently enjoining and restraining Defendants PCRRO and Chairman Traier from endorsing any candidates for Assembly from District 40, or otherwise allowing any such candidates to use the slogan of the PCRRO until such time as this matter has been resolved at the hearing and as determined by the Passaic County Superior Court; and

(h) an Order requiring Defendants PCRRO and Chairman Traier to conduct a new vote under the direction of a special master to be appointed by this Court, and providing that such election be conducted in such a manner as comports with N.J.S.A. 19:5-3.2 and PCRRO's own By-Laws, or, in the alternative, an Order directing a recount of the votes by an independent special master to be appointed by the Court to determine which candidates for Assembly from District 40 will be endorsed and entitled to use the slogan of the PCRRO, and in doing so, to count the votes of any member that bullet voted, provided that Defendants provide sufficient proof of chain of custody of all the ballots verified by an independent third party (e.g. the Board of Elections); and

(i) the payment of Plaintiffs' attorneys' fees and costs; and

(j) such other and further relief as the Court may deem just and equitable.

SECOND COUNT

VIOLATION OF THE FIRST AND FOURTEENTH AMENDMENTS OF THE UNITED STATES CONSTITUTION

68. Plaintiffs repeat and reallege the allegations set forth in the foregoing paragraphs of this Complaint as if set forth more fully herein.

69. PCRRO adopted a rule requiring members to affirmatively vote for two candidates, and to prohibit bullet voting for a single candidate, with respect to the determination as to which Assembly candidates to endorse for District 40, thus compelling Plaintiff Connolly to vote for and associate with candidates whom he did not support.

70. PCRRO did not count Plaintiff Connolly's ballot because he voted for a single candidate and did not vote for either of the Incumbent Candidates whom he did not support, thus punishing him for choosing not to associate with the Incumbent Candidates and depriving him of his right to vote for the candidate of his choice.

71. Such actions by a county political organization involved in conduct directly related to the primary election constitute state action.

72. Such actions violate Plaintiffs' right to vote, free speech, and freedom of association under the First and Fourteenth Amendments of the United States Constitution.

WHEREFORE, Plaintiffs demand:

(a) a finding that Defendants PCRRO and Chairman Traier violated Plaintiffs' First and Fourteenth Amendment right to vote, of free speech, and of freedom of association by compelling that Plaintiff Connolly vote for candidates that he did not support and not counting his ballot; and

(b) injunctive relief temporarily enjoining and restraining Defendants PCRRO and Chairman Traier from discarding or otherwise destroying any ballots used in connection with PCRRO's vote concerning the determination as to which candidates for Assembly in District 40 should be entitled to use the slogan of PCRRO until such time as this matter has been heard; and

(c) injunctive relief temporarily enjoining and restraining Defendants PCRRO and Chairman Traier from endorsing any candidates for Assembly from District 40, or otherwise allowing any such candidates to use the slogan of the PCRRO until such time as this matter has been heard; and

(d) injunctive relief preliminary and permanently enjoining and restraining Defendants PCRRO and Chairman Traier from discarding or otherwise destroying any ballots used in connection with PCRRO's vote concerning the determination as to which candidates for Assembly in District 40 should be entitled to use the slogan of PCRRO until such time as this matter has been resolved at a hearing and as determined by the Passaic County Superior Court; and

(e) injunctive relief preliminarily and permanently enjoining and restraining Defendants PCRRO and Chairman Traier from endorsing any candidates for Assembly from District 40, or otherwise allowing any such candidates to use the slogan of the PCRRO until such time as this matter has been resolved at the hearing and as determined by the Passaic County Superior Court; and

(f) an Order requiring Defendants PCRRO and Chairman Traier to conduct a new vote under the direction of a special master to be appointed by this Court, and providing that such election be conducted in such a manner as comports with N.J.S.A. 19:5-3.2 and PCRRO's own By-Laws, or, in the alternative, an Order directing a recount of the votes by an independent special master to be appointed by the Court to determine which candidates for Assembly from District 40 will be endorsed and entitled to use the slogan of the PCRRO, and in doing so, to count the votes of any member that bullet voted, provided that Defendants

provide sufficient proof of chain of custody of all the ballots verified by an independent third party (e.g. the Board of Elections); and

- (g) the payment of Plaintiffs' attorneys' fees and costs; and
- (h) such other and further relief as the Court may deem just and equitable.

THIRD COUNT

VIOLATION OF N.J. CONST., ART. I, PARA. 6

73. Plaintiffs repeat and reallege the allegations set forth in the foregoing paragraphs of this Complaint as if set forth more fully herein.

74. PCRRO adopted a rule requiring members to affirmatively vote for two candidates, and to prohibit bullet voting for a single candidate, with respect to the determination as to which Assembly candidates to endorse for District 40, thus compelling Plaintiff Connolly to vote for and associate with candidates whom he did not support.

75. PCRRO did not count Plaintiff Connolly's ballot because he voted for a single candidate and did not vote for either of the Incumbent Candidates whom he did not support, thus punishing him for choosing not to associate with the Incumbent Candidates and depriving him of his right to vote for the candidate of his choice.

76. Such actions violate Plaintiffs' right to vote, free speech, and freedom of association under N.J. Const., Art. I, Para. 6.

WHEREFORE, Plaintiffs demand:

(a) a finding that Defendants PCRRO and Chairman Traier violated Plaintiffs' right to vote, of free speech, and of freedom of association under N.J. Const., Art. I, Para. 6 by compelling that Plaintiff Connolly vote for candidates that he did not support and not counting his ballot; and

(b) injunctive relief temporarily enjoining and restraining Defendants PCRRO and Chairman Traier from discarding or otherwise destroying any ballots used in connection with PCRRO's vote concerning the determination as to which candidates for Assembly in District 40 should be entitled to use the slogan of PCRRO until such time as this matter has been heard; and

(c) injunctive relief temporarily enjoining and restraining Defendants PCRRO and Chairman Traier from endorsing any candidates for Assembly from District 40, or otherwise allowing any such candidates to use the slogan of the PCRRO until such time as this matter has been heard; and

(d) injunctive relief preliminary and permanently enjoining and restraining Defendants PCRRO and Chairman Traier from discarding or otherwise destroying any ballots used in connection with PCRRO's vote concerning the determination as to which candidates for Assembly in District 40 should be entitled to use the slogan of PCRRO until such time as this matter has been resolved at a hearing and as determined by the Passaic County Superior Court; and

(e) injunctive relief preliminarily and permanently enjoining and restraining Defendants PCRRO and Chairman Traier from endorsing any candidates for Assembly from District 40, or otherwise allowing any such candidates to use the slogan of the PCRRO until such time as this matter has been resolved at the hearing and as determined by the Passaic County Superior Court; and

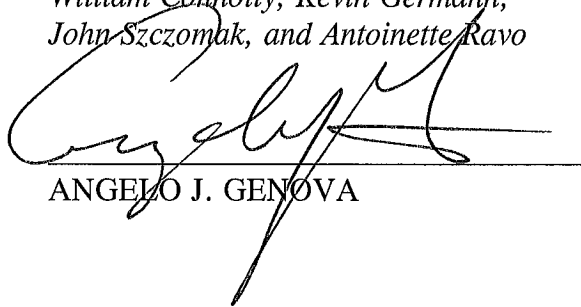
(f) an Order requiring Defendants PCRRO and Chairman Traier to conduct a new vote under the direction of a special master to be appointed by this Court, and providing that such election be conducted in such a manner as comports with N.J.S.A. 19:5-3.2 and

PCRRO's own By-Laws, or, in the alternative, an Order directing a recount of the votes by an independent special master to be appointed by the Court to determine which candidates for Assembly from District 40 will be endorsed and entitled to use the slogan of the PCRRO, and in doing so, to count the votes of any member that bullet voted, provided that Defendants provide sufficient proof of chain of custody of all the ballots verified by an independent third party (e.g. the Board of Elections); and

- (g) the payment of Plaintiffs' attorneys' fees and costs; and
- (h) such other and further relief as the Court may deem just and equitable.

GENOVA BURNS LLC

*Attorneys for Plaintiffs,
William Connolly, Kevin Germann,
John Szczomak, and Antoinette Ravo*



ANGELO J. GENOVA

Date: March 12, 2015

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:5-1(c), Angelo J. Genova, Esq., is hereby designated as trial counsel on behalf of plaintiffs William Connolly, Kevin Germann, John Szczomak, and Antoinette Ravo.

RULE 4:5-1 CERTIFICATION

I hereby certify pursuant to R. 4:5-1(b) that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding, nor is any other action contemplated. I further certify that there are no other parties who should be joined in the action pursuant to R. 4:28, or who is subject to joinder pursuant to R. 4:29-1(b).

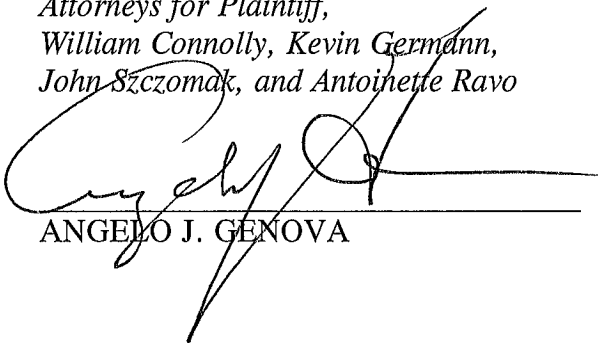
DEMAND FOR JURY TRIAL PURSUANT TO RULE 4:35-1

Plaintiffs William Connolly, Kevin Germann, John Szczomak, and Antoinette Ravo, respectfully request a trial by jury on all claims asserted by and against them in this lawsuit, and on all issues so triable.

I certify that the foregoing statements made by me are true and I am aware that if any of the statements made by me are willfully false, I am subject to punishment.

GENOVA BURNS LLC

*Attorneys for Plaintiff,
William Connolly, Kevin Germann,
John Szczomak, and Antoinette Ravo*



ANGELO J. GENOVA

Date: March 12, 2015

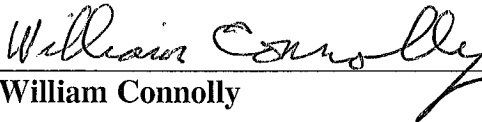
VERIFICATION OF COMPLAINT

I, **William Connolly**, upon my oath, hereby certify as follows:

1. I am a named plaintiff to this Verified Complaint.

2. I am fully familiar with the facts and circumstances alleged in the foregoing Verified Complaint. I have read the Verified Complaint and affirm that, to the best of my personal knowledge and based on my personal knowledge and the documents attached to this Verified Complaint, the facts stated therein are true.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.



William Connolly

Dated: March 11, 2015

12925055v15

EXHIBIT A

Passaic County Regular Republican Organization

576 Valley Rd #296 Wayne, NJ

Chairman: John Traier

Vice-Chairman: Barbara Silvestro-Roca

By-Laws

Passaic County Republican Committee

BY-LAWS PREAMBLE

The following By-Laws were adopted by the members of this organization for its proper government and the regulation of its affairs in order to strengthen the effectiveness of the organization in promoting the election of Republican public officials responsive to the Republican voters of this County.

I. NAME

The official Passaic County Republican Committee established by Title 19 of the NJ statutes shall be known as the PCRRO. From time to time the name of the official Passaic County Republican Committee established by Title 19 of the NJ statutes may be changed, by a majority vote of the executive committee as defined herein.

II. OBJECT

The objectives of this Committee shall be to further the cause of the Republican Party in Passaic County, New Jersey, and to maintain, advocate, and promote the principles of the Republican Party through its members and elected representatives as enunciated by the Republican Party of the United States; to resist and oppose political corruption, and to engage the interest and activity of all voters within the County of Passaic in support of the objectives of the Republican Party so that the administration of government shall continuously improve through the medium of the party, for the betterment of all the people; to encourage and support the election of qualified Republican candidates to elective office at all levels of government in accordance with the law; to represent the wishes and interests of the Republican voters of the County of Passaic and to act on behalf of the Republican voters of the County of Passaic where authorized and empowered by the law to do so.

III. STRUCTURE

COUNTY COMMITTEE

The County Committee shall consist of two persons, preferably one male and one female, representing each election district in each of the sixteen (16) municipalities comprising the County of Passaic and elected in a Republican Primary Election by the Republican voters of that district or otherwise designated in accordance with the law and these By-Laws to represent that district. In order to qualify to represent an election district as a Republican County Committee person an individual must reside in and be a registered Republican voter in the district represented and conduct themselves in accordance with these By-Laws for the purposes expressed herein. The term of office for members of the County Committee shall be three years, starting with their qualification following the Primary Election of the year 2000 and continuing until the primary election of 2003 and in the same manner thereafter every three years. Any appointee to represent a district must be fully qualified as specified herein to represent that district and shall serve for the remainder of the term to which they are appointed so long as they shall remain qualified.

A. EXECUTIVE COMMITTEE

The Executive Committee shall consist of the Chairperson and the Vice-Chairperson duly elected by the County Committee in accordance with these By-Laws; the two (2) State Committee persons duly elected by the Republican voters of the County or otherwise designated in accordance with these By-Laws; the Finance Chair appointed by the County Chair with the advise and consent of the Executive Committee in accordance with these By-Laws; the sixteen Municipal Chairpersons duly designated by each of the sixteen (16) Republican Municipal Committees in accordance with these By-Laws; all Republican elected officials holding County-wide office representing Passaic County; and all Republican elected officials holding State or Federal office who are residents of Passaic County. All members of the Executive Committee are ex officio and are qualified to be members of the Executive Committee only so long as they hold the office designated.

B. BOARD OF GOVERNORS

The Board of Governors shall consist of all members of the Executive Committee; all officers of this organization as specified herein; all State and Federal Republican elected officials representing any portion of Passaic County but not residing therein; and all Republican mayors of Passaic County municipalities, whether or not elected by partisan elections. All members of the Board of Governors are ex officio and are qualified to be members of the Board of Governors only so long as they hold the office designated.

C. COUNTY CHAIR AND VICE-CHAIR

There shall be a Chairperson, who shall be the Chief Executive Officer of the Organization with such duties and authority as are set for the herein, and a Vice-Chairperson, who shall be of the opposite sex from the Chairperson. The Chairperson and Vice Chairperson shall be elected by a majority vote of the County Committee at a meeting to be held on the first Tuesday following the primary election at which the County Committee is elected to a term of the same duration as the County Committee. The Chair and Vice-Chair must be registered Republican voters who are residents of Passaic County. The election shall be by secret ballot, utilizing a voting machine if practicable, with each County Committee member being entitled to one vote and required to be present at the vote. The requirement for a secret ballot may not be waived or suspended under any circumstance save if there be one candidate only for the office.

D. STATE COMMITTEE MEMBERS

There shall be two (2) State Republican Committee members, one of each sex who shall be registered Republican voters residing in Passaic County, representing the organization on that body. They shall be elected by the Republican voters of Passaic County at the same election and in the same manner as the County Committee and for the same term. In the event a vacancy occurs in the office of State Committee member, the position may be filled by appointment of the Executive Committee for the balance of the term.

F. OFFICERS

There shall be a Secretary, a Treasurer, a Finance Chair and an Attorney and Assistant Attorney to the Organization who may be appointed by the Chair, for the same term as the Chair and with such powers and duties as are set forth herein, subject to the advice and consent of the Executive Committee.

G. DISQUALIFICATION FOR CONVICTION OF CRIME

No person shall be qualified to serve as Municipal Leader or member of the Executive Board who is otherwise unqualified to hold elective office or has been convicted of a crime of the third degree or higher, involving dishonesty or moral turpitude or which constitutes a felony in either the State of New Jersey, Federal jurisdiction or equivalent of same in another jurisdiction. All Municipal Leaders or members of the Executive Board shall execute a certified statement that the individual has not been convicted of a crime of

the third degree or higher, involving dishonesty or moral turpitude or which constitutes a felony in either the State of New Jersey, Federal jurisdiction or equivalent of same in another jurisdiction.

IV. OPERATION

The day-to-day operations of the organization shall be managed and directed by the Chair, with the assistance and advice of the officers, in accordance with these By-Laws and the direction and policy set by the Executive Committee and the County Committee, as expressed in Resolutions adopted by a majority of those present at a duly announced meeting. The Chair and the officers shall meet at least monthly with the Executive Committee at a duly announced meeting, in order to report on and discuss all actions taken during the preceding month and receive the advice and input of the Committee. In the event the Executive Committee shall, by a vote of two-thirds (2/3) of its' members, disapprove of an action or decision made by the Chair or any officer, that action or decision shall either be reversed or changed in accordance with the wishes of the Executive Committee or the Chair may, within two weeks, convene a meeting of the Board of Governors. At such meeting the Board of Governors shall hear the matter and either rule, adopting either the position of the Chair or the Executive Committee, or determine to convene a special meeting of the entire County Committee to resolve the matter in dispute. In such event the County Committee will meet to hear debate on the issue and provide direction in the form of a Resolution adopted by a majority of those voting. Such determination will be final and binding.

V. CORPORATE INTERESTS

The Organization by and through a majority vote of the Executive Committee, for the purposes of owning and or preserving a slogan(s) and or official designation(s) in accordance with Title 19 of the NJ statutes, shall be permitted to acquire, establish incorporate and or maintain corporate entities and or intellectual properties.

In the event the organization obtains a corporate interest in accordance with Article V of these bylaws, the Chairman, Vice Chair and Treasurer shall be designated as the sole trustees of said corporation(s) and shall hold such positions in those corporations only during the terms of their official party positions in the official Passaic County Republican Committee established by Title 19 or the NJ statutes. Any vacancy however caused in the official party position of Chairman, Vice Chair and or Treasurer in the Passaic County Republican Committee, shall contemporaneously constitute a vacancy in the trusteeship of the any and all such corporate entity(ies) and the successor(s) to such official party position(s) shall also serve as successor(s) trustees to the corporate entity(ies).

VI. SLOGAN/SELECTION

It is recognized and acknowledged that candidates for election in a Republican Primary will desire to utilize the name of this organization, "PCRRO", and or the names of any corporate entities owned or controlled by the official Passaic County Republican Committee established by title 19 including but not limited to the "Passaic County Regular Republican Organization, Inc.", "PCRRO Inc." and/or any other name, slogan, identity and or interest associated with this organization as their slogan in accordance with Title 19 of the New Jersey Statutes. It is the intent and determination of this body that the name(s) of this organization, the names of all corporate entities owned and or controlled by this organization and or any other names identified with this corporation are the property of the official Passaic County Republican Committee and may only be utilized in accordance with the procedures specified herein and as may be directed by the organization in accordance therewith. Any candidate desirous of utilizing the slogan "PCRRO", "Passaic County Regular Republican Organization Inc.", and or any other name, slogan, identity and or interest associated with this organization (hereinafter "party slogan") must, as a condition precedent to such

utilization, agree to abide by such procedures and direction.

A. MUNICIPAL COMMITTEE CANDIDATES

The determination of which candidates for County/Municipal Committee shall be entitled to utilize the party slogan in a primary election shall be at the sole and unencumbered discretion of the Municipal Leader of the municipality, provided that such candidate shall be otherwise qualified for the office in accordance with the law and these By-Laws. Under no circumstances shall the right of the municipal leader to make such determination as to his/her municipality be constrained and such determination shall be final and binding on this organization.

B. STATE COMMITTEE CANDIDATES

The determination of which candidates for State Committee shall be entitled to utilize the party slogan in a primary election shall be at the sole and unencumbered discretion of the County Chair subject to the advice and consent of the Executive Committee, provided that such candidate shall be otherwise qualified for the office in accordance with the law and these By-Laws.

C. CANDIDATES FOR MUNICIPAL OFFICE

The determination of which candidates for municipal office shall be entitled to utilize the party slogan in a primary election shall be at the sole and unencumbered discretion of the municipal committee of the municipality in accordance with such procedures as they may deem appropriate. Such determination shall be conveyed and certified to as in accordance with the municipal committee procedures by the municipal leader of such municipality. Under no circumstances shall the right of the municipal committee to make such determination as to their municipality be constrained and such determination shall be final and binding on this organization.

D. CANDIDATES FOR COUNTY-WIDE OFFICE

The determination of which candidates for county-wide office shall be entitled to utilize the party slogan in a primary election shall be made by the Executive Committee in accordance with the following procedure:

1. CANDIDATES FORUM

No less than ten (10) and no more than ninety (90) days prior to the date set under New Jersey Law for submission of petitions for candidacies in the Republican Primary Election the Chair shall convene a meeting of the organization for the purpose of screening candidates for election to public office desirous of running in the Republican Primary utilizing the party slogan. All interested candidates will be required to submit a written request addressed to the Chair and containing a resume of biographical and other pertinent information. Each candidate shall be provided with an opportunity to address the meeting under rules to be set by the chair so as to provide equality of opportunity to each and every candidate to make such presentation. Each candidate must be presented, either directly or through a representative, in order to be considered for selection. The Chair shall set reasonable rules and procedures to this end. No determination of selection shall be made or solicited at this meeting and no other business will be conducted except to provide a forum for interested candidates to present themselves to the organization.

2. SELECTION

No less than three (3) days and no more than fourteen (14) days following the Candidate's Forum the Chair shall convene a meeting of the Executive Committee for the sole purpose of selecting which candidate(s) to be authorized and entitled to utilize the party slogan in the next primary election. The Committee shall be limited to those persons announcing and submitting their candidacies at the Candidates Forum and shall determine their selection for each office by majority vote of those present.

3. NOTIFICATION

The Chair shall notify the Candidates, the appropriate election officials and the members of the Organization of the Executive Committee's Determination.

E. CANDIDATES FOR STATE AND FEDERAL OFFICE

The determination of which candidates for state and federal office shall be entitled to utilize the party slogan in a primary election shall be made by the Executive Committee in accordance with the same procedure specified above for candidates for countywide office.

VII. MEMBERSHIP

All Republican voters in Passaic County and all Republican holders of public office representing the voters of any portion of Passaic County are members of this organization and a part of the Passaic County Republican Party. The County Committee members, elected officials and officers of the organization are privileged to act on behalf of those Republican voters and represent their interests.

A. COUNTY COMMITTEE

1. QUALIFICATIONS

A member of the County Committee must be a duly registered Republican voter resident in the election district which he/she represents. No more than two (2) persons shall represent any single election district. While the organization recommends that the two (2) representatives of each district be of opposite sex, that is one male and one female, same shall not be required and both county committee members from a district may be of the same sex if otherwise qualified and properly designated. County Committee shall be elected by the voters of their respective districts in the republican primary of every third year starting in 2000 for a three-year term commencing on the Saturday following the primary election.

2. DUTIES

It is the duty and responsibility of the County Committee to maintain communication between the elected Republican officials and the Republican voters of their district and present the views of those voters to appropriate Republican officials; to contact and register all new residents and those coming of voting age in their districts; to attend all meetings of the Municipal Committee and the County Committee in order to be informed on current matters they may be called on to explain; to assist in the election campaigns of Republican candidates for offices representing their voting district; to act as a challenger in their voting district at each primary and general election to observe the opening of the voting machine at the close of the polls and record results for delivery to the Municipal Leader; to be prepared to vote and to vote on all voting matters that validly come before the municipal committee and county committee at any regular meeting or a special meeting if duly called and announced for that purpose, but only if a quorum be present and voting; and to perform such other duties consistent with the objectives of the organization and as may be required by the municipal and county leadership.

3. REMOVAL

Pursuant to law a member of the County Committee is automatically removed, and the seat held by such member declared vacant, should such member formally change party affiliation so as to cease to be a registered republican voter, cease to reside within the election district they represent or die.

Additionally any Municipal /County Committee member who openly supports the election of a candidate for public office in a general election other than the duly designated candidate of the Republican Party or otherwise engages in conduct subversive to the Passaic County Republican Committee; or otherwise seriously violates the duties, obligations or responsibilities of their office shall be subject to removal by either the Municipal Committee or by the Executive Committee of the Passaic County Republican Committee.

For action by the Municipal Committee:

Removal for cause as specified shall be initiated by the municipal committee, in accordance with the By-Laws of that municipal committee, and reported to the Executive Committee.

The member removed by the municipal committee may, within fifteen (15) days after the sending of Certified Mail Notice of such removal and the reasons therefore to the members last known address, petition the Executive Committee for a hearing on such removal. The Executive Committee shall, either directly or by delegation to a subcommittee of its members, consider the members challenge to the removal and determine whether such removal is affirmed or reversed. The procedure to be utilized in each individual case shall be at the sole discretion of the Executive Committee and the determination of the Executive Committee shall be final. Under no circumstances shall support of a candidate in a Republican Primary be deemed cause for removal.

For removal by the Executive Committee:

Removal can be made for the open support of any candidate running against a Republican Candidate appearing on the Passaic County election ballot for a general election for any office (Federal, State, County or local) or for any other subversive conduct adverse to the interests of the Passaic County Republican Committee, as determined by the Executive Committee at any point in time, so long as the removal proceedings are commenced within the same term of office as the offending conduct that gives rise to the same.

Said removal shall be made after formal notice to said County committee member and a formal hearing as so designated by the Passaic County Republican Chairman.

The determination of the Executive Committee shall be deemed final and not subject to appeal or judicial review.

All issues of procedure for said hearing shall be determined by counsel to the Passaic County Republican Committee.

3.1 Municipal Leaders

A. Each Municipal Leader must provide candidates for each and every office up for election for each and every municipal election and provide the names for each candidate and a copy of a fully completed petition (including the County slogan/ designation) for each and every position for Municipal Committee/County Committee and Municipal Office to the Chairman of the Passaic County Republican Committee at least 14 days before the deadline for filing said petitions as designated by the Clerk of Passaic County and in accordance with title 19 of the New Jersey Statutes.

B. Each and every Republican Municipal Leader of each of the municipalities of Passaic County must notify the Chairman of the Passaic County Republican Committee in writing of their intent to run candidates using the Passaic County Republican designation/slogan for any municipal office or municipal/county committee seat for any upcoming Primary Election, within 5 days written request from the Chairman of the Passaic County Republican Committee.

C. In the event that the any Republican Municipal Leader of any Passaic County Municipality, fails to perform any of the duties set forth in section 3 of these By-Laws or either paragraphs A. or B. of this section 3.1, the Executive Committee of the Passaic County Republican Committee can designate the County Chairman as the appropriate individual to authorize the use of the Passaic County Republican Committee's designation/slogan and under those circumstances the municipal leader in question shall be deemed to have waived his/her right to do so and forfeit the same to the County Chairman.

4. VACANCIES

A vacancy on the County Committee, whether by resignation, death or removal, shall be filled by the municipal committee wherein such vacancy occurs in accordance with the law and the By-Laws of that municipal committee, for the balance of the term only. Any person appointed to fill a vacancy must meet all the qualifications of office specified herein and shall have the same duties, responsibilities, rights and obligations

VIII. FISCAL CONTROL

A. RESPONSIBILITY

This organization shall raise funds for the operations of the organization and to promote its' purposes and objectives. The Finance Director shall have charge of fund raising under the direction and authority of the County Chair and the Executive Committee but shall have no authority over the expenditure of funds except to the extent necessary and approved for fund raising purposes. The Treasurer shall have charge and responsibility for all funds raised or received by the organization and for all funds expended by the organization for any purpose. The Chair and the Executive Committee shall have sole and exclusive authority to authorize or direct the expenditure of funds.

B. RECORDS

The Treasurer shall maintain the books of the organization and file all necessary reports, including but not limited to the reports required under election law to the New Jersey Election Law Enforcement Commission (ELEC). Each member of the Executive Committee shall be provided with a full and complete copy of all ELEC reports within ten (10) days of their filing. In addition, both the Finance Director and the Treasurer shall be obligated to provide monthly reports of all activities to the Executive Committee at their regular monthly meetings. Any reimbursement to any person for expenditures on behalf of or for the benefit of the organization or its purposes must be fully explained in writing as part of the regular reporting obligation of the Treasurer and shall be part of the records maintained as a matter of course.

C. INSPECTION

The books and financial records of the organization shall be open for inspection by any member upon written request. Such inspection shall be in the presence of an officer designated by the Chair or the Executive Committee and shall be provided within a reasonable time following receipt of a request. The Executive Committee, the Board of Governors or the County Committee may, by majority vote of such body, require that an audit of the organization's books and records be performed by an independent auditor and a report provided.

IX. BY-LAWS

A. COPIES

Each County Committee member and each member of the Executive Committee and Board of Governors shall be provided with a current copy of these By-Laws upon assuming office or upon request.

B. RULES OF ORDER

The conduct and procedure of meetings held by this organization shall be in accordance with these bylaws. In the event these bylaws are silent as to procedure and or conduct, Roberts Rules of Order shall control. In no event shall Robert's Rules of Order circumvent the interpretive powers of Counsel to this organization.

C. INTERPRETATION

The Counsel to the organization appointed by the Chair with the advice and consent of the Executive Committee shall act as Parliamentarian and rule on questions of interpretation of these By-Laws, subject to the right of the Executive Committee or the County Committee to overrule such interpretation by majority vote.

D. AMENDMENT

These By-Laws may be amended only upon the recommendation of the Executive Committee and after the submission of any proposed amendment in writing to each member of the County Committee and Board of Governors at least seven (7) days in advance of a general meeting at which such amendment is to be considered. Adoption of an amendment shall require a majority vote of the County Committee and shall be effective immediately upon adoption. For purposes of this subsection only, the term "majority vote" shall mean a majority vote of those County Committee members present so long as a quorum of no less than 25% of the complete compliment of the County Committee is present at a meeting duly called in accordance with this Article IX of these Bylaws.

E. MUNICIPAL COMMITTEES

Each Municipal Committee shall provide a current copy of the By-Laws governing that organization to the Secretary and shall maintain such copy current as it may be amended by the Municipal Committee. The By-Laws of a Municipal Committee shall not be inconsistent with these By-Laws and shall be ineffective to the extent they are inconsistent herewith. Any Municipal Committee which does not presently have written By-Laws shall prepare and adopt such By-Laws within six (6) months of the date of the adoption of these By-Laws. The Chair and the Executive Committee shall provide reasonable assistance to Municipal Organizations to this end.

In the event for any reason whatsoever (i.e. Death or resignation etc...), a Republican Municipal Committee in Passaic County is without leadership (i.e. No Chairman or Vice Chairman, the Executive Committee of the Passaic County Republican Committee shall assume leadership to perform all duties of the Chairman set forth in statute and these By-Laws, including holding elections to install new leadership, which shall occur within 45 days of notice of the vacancies.

F. SEVERABILITY:

If any provision, word and or any other part of these bylaws shall be adjudged unenforceable in any way, the remaining aspects of these By-Laws shall survive as if the unenforceable provision was originally not included in these By-Laws and the remaining aspects of these bylaws shall be read logically to further the purposes expressed herein until such time as these bylaws may be amended.

EXHIBIT B

COMPLETE ALL INFORMATION ON THIS PAGE PRIOR TO CIRCULATION

(Petition filing deadline - before 4pm on the 64th day before the primary election) (N.J.S.A. 19:23-14)

Total Number of Signatures on this Petition _____

Legislative District No. _____

Total Number of Signatures on all Petitions _____

PETITION OF NOMINATION FOR THE PRIMARY ELECTION

_____ PARTY
(PRINT NAME OF PARTY)

PETITION FOR MEMBER OF THE NEW JERSEY GENERAL ASSEMBLY

100 Signatures Required

(N.J.S.A. 19:23-8)

To the Honorable Secretary of State:

(N.J.S.A. 19:23-6)

Each signer of this petition certifies that the following statements are true:

- 1) I reside in the State of New Jersey in the _____ Legislative District;
- 2) I am a qualified voter therein;
- 3) I am a member of the _____ party;
- 4) I intend to affiliate with the said party at the ensuing election;
- 5) I endorse the person named as candidate for the nomination of the office of Member of the New Jersey General Assembly; and
- 6) I request that you cause to be printed upon the official primary ballot of the said party, the name of said person as the candidate for such nomination; (N.J.S.A. 19:23-7).

Name of Candidate(s) (Name(s) must appear the same on all petition booklets to be filed.)	Residence & Post Office Address	City	Zip Code
----------------------------------------------------------------------------------------------	---------------------------------	------	----------

Check box if candidates listed above are to be bracketed on ballot and their names shall appear on the ballot as indicated. (N.J.S.A. 19:14-10, N.J.S.A. 19:14-12)

CANDIDATE'S REQUEST FOR SLOGAN ON THE OFFICIAL PRIMARY ELECTION BALLOT

The candidate named in this petition request that there be printed on the primary election ballot the following slogan: (Slogan must not exceed six words and must be in accord with N.J.S.A. 19:23-17. If slogan includes the name of any person other than the candidate or any incorporated association of this State, written consent of such person or incorporated association of this State must be attached.)

<u>County</u>	<u>Slogan</u> (Please Print or Type)
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____

NOTE: There are up to four counties in a legislative district, so enough lines are provided above for the purpose of identifying slogans in each county where the nominee is a candidate.

COMMITTEE ON VACANCIES

(The Committee on Vacancies may only fill a vacancy up to 55 days before the Primary Election) (N.J.S.A. 19:23-12) This committee shall have power in case of resignation or otherwise of the person endorsed as a candidate in said petition to fill such a vacancy by filing with the Secretary of State, a certificate of nomination to fill the vacancy.

Note: It is not mandatory to have a "Committee on Vacancies".

The names and residence addresses of the three members named as a committee on vacancies are as follows:

Name(s)	Residence Address	City	Zip Code
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

SIGNATURE SHEET

Signature and residence address of registered voter:

1.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
2.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
3.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
4.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
5.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
6.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
7.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
8.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
9.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
10.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code

SIGNATURE SHEET

Signature and residence address of registered voter:

11.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
12.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
13.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
14.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
15.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
16.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
17.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
18.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
19.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
20.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code

SIGNATURE SHEET

Signature and residence address of registered voter:

21.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
22.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
23.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
24.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
25.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
26.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
27.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
28.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
29.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
30.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code

SIGNATURE SHEET

Signature and residence address of registered voter:

31.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
32.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
33.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
34.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
35.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
36.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
37.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
38.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
39.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
40.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code

SIGNATURE SHEET

Signature and residence address of registered voter:

41.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
42.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
43.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
44.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
45.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
46.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
47.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
48.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
49.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
50.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code

SIGNATURE SHEET

Signature and residence address of **registered voter**:

51.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
52.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
53.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
54.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
55.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
56.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
57.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
58.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
59.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
60.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code

SIGNATURE SHEET

Signature and residence address of registered voter:

61.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
62.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
63.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
64.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
65.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
66.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
67.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
68.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
69.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
70.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code

SIGNATURE SHEET

Signature and residence address of **registered voter**:

71.	Signature	Print Name
	Residence Address (Number and Street)	City Zip Code
72.	Signature	Print Name
	Residence Address (Number and Street)	City Zip Code
73.	Signature	Print Name
	Residence Address (Number and Street)	City Zip Code
74.	Signature	Print Name
	Residence Address (Number and Street)	City Zip Code
75.	Signature	Print Name
	Residence Address (Number and Street)	City Zip Code
76.	Signature	Print Name
	Residence Address (Number and Street)	City Zip Code
77.	Signature	Print Name
	Residence Address (Number and Street)	City Zip Code
78.	Signature	Print Name
	Residence Address (Number and Street)	City Zip Code
79.	Signature	Print Name
	Residence Address (Number and Street)	City Zip Code
80.	Signature	Print Name
	Residence Address (Number and Street)	City Zip Code

SIGNATURE SHEET

Signature and residence address of registered voter:

81.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
82.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
83.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
84.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
85.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
86.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
87.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
88.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
89.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code
90.	_____ Signature	_____ Print Name
	_____ Residence Address (Number and Street)	_____ City
		_____ Zip Code

SIGNATURE SHEET

Signature and residence address of registered voter:

91.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
92.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
93.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
94.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
95.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
96.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
97.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
98.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
99.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code
100.	_____ Signature	_____ Print Name	
	_____ Residence Address (Number and Street)	_____ City	_____ Zip Code

AFFIDAVIT OF PERSON WHO CIRCULATES THIS PETITION AND WITNESSES SIGNATURES
(N.J.S.A. 19:23-11)

The witness taking the affidavit below must be the person who obtained the names on this set of signatures or several sets of signatures. The witness must take the affidavit for each set he/she solicits and sign in the presence of a person authorized to administer affidavits (e.g., notary public).

State of New Jersey :
: ss.
County of :

I, (Print Name of Circulator/Witness), being duly sworn, upon my oath say that I am a registered voter in this State whose party affiliation is of the same political party named in the petition; that the petition is signed by each of the signers thereof in his/her proper handwriting; that the signers are to the best knowledge and belief of the affiant legal voters of the State or political subdivision thereof, as the case may be, as stated in the petition, belong to the political party named in the petition.

Sworn and subscribed to before me in

(List County where Affidavit was signed and notarized1) N.J., on

(Signature of Circulator/Witness)

this (Day) day of

(Residence Address of Circulator/Witness)

(Month), 20 (Year)

(City or Town of Circulator/Witness (Zip Code)

(Notary Signature)

(My Commission Expires)

(Place Notary Stamp in the area above)

NOTICE

All candidates are required by law to comply with the provisions of the "New Jersey Campaign Contributions and Expenditures Reporting Act." For further information, please call (609) 292-8700.

Candidate Need Only Sign This Page Once for All Petitions

OATH OF ALLEGIANCE

State of New Jersey :
County of : : ss.

I, _____, do solemnly swear (or affirm) that I will support the Constitution of the
(Print Name of General Assembly Candidate)
United States and the Constitution of the State of New Jersey; that I will bear true faith and allegiance to the same
and to the Governments established in the United States and in this State, under the authority of the people.
So help me God.

Sworn and subscribed to before me in

_____ N.J., on _____
(List County where Oath was signed and notarized) (Signature of General Assembly Candidate)

this _____ day of _____
(Day)

_____, 20_____
(Month) (Year)

(Notary Signature)

(My Commission Expires)

CERTIFICATE OF ACCEPTANCE TO BE SIGNED BY CANDIDATE
(N.J.S.A. 19:23-15)

I, the undersigned, hereby certify that I am a member of the _____ Party and qualified
for the office.

(Signature of General Assembly Candidate)

(Printed or Typewritten Name of General Assembly Candidate)

(Residence Address of General Assembly Candidate)

(City or Town & Zip Code of General Assembly Candidate)

Candidate Must Sign an Oath of Allegiance and Certificate of Acceptance

Pursuant to N.J.S.A. 19:23-15, however, no candidate who has accepted the nomination by a direct petition of nomination for the
general election shall sign an acceptance to a petition of nomination for such office for the primary election. In addition, no candidate
named in a petition for the office of Member of the New Jersey General Assembly shall sign an acceptance if the candidate has
signed an acceptance for the primary nomination or any other petition of nomination for the office of member of the New Jersey General
Assembly in another legislative district in the same calendar year.

Candidate Need Only Sign This Page Once for All Petitions

OATH OF ALLEGIANCE

State of New Jersey :
County of : : ss.

I, _____, do solemnly swear (or affirm) that I will support the Constitution of the
(Print Name of General Assembly Candidate)
United States and the Constitution of the State of New Jersey; that I will bear true faith and allegiance to the same
and to the Governments established in the United States and in this State, under the authority of the people.
So help me God.

Sworn and subscribed to before me in

_____ N.J., on _____
(List County where Oath was signed and notarized) (Signature of General Assembly Candidate)

this _____ day of _____
(Day)

_____, 20_____
(Month) (Year)

(Notary Signature)

(My Commission Expires)

CERTIFICATE OF ACCEPTANCE TO BE SIGNED BY CANDIDATE
(N.J.S.A. 19:23-15)

I, the undersigned, hereby certify that I am a member of the _____ Party and qualified
for the office.

(Signature of General Assembly Candidate)

(Printed or Typewritten Name of General Assembly Candidate)

(Residence Address of General Assembly Candidate)

(City or Town & Zip Code of General Assembly Candidate)

Candidate Must Sign an Oath of Allegiance and Certificate of Acceptance

Pursuant to N.J.S.A. 19:23-15, however, no candidate who has accepted the nomination by a direct petition of nomination for the
general election shall sign an acceptance to a petition of nomination for such office for the primary election. In addition, no candidate
named in a petition for the office of Member of the New Jersey General Assembly shall sign an acceptance if the candidate has
signed an acceptance for the primary nomination or any other petition of nomination for the office of member of the New Jersey General
Assembly in another legislative district in the same calendar year.

DISCLOSURE STATEMENT OF CRIMINAL CONVICTION

Pursuant to P.L. 2004, chapter 26 the following statement **must be completed and filed** with the Nomination Petition

Please Check Applicable Box

I, the undersigned, hereby certify that in accordance with N.J.S.A. 19:23-15:

- I have not been convicted of any offense graded by Title 2C of the New Jersey Statutes as a crime of the first, second, third or fourth degree, or an offense in any jurisdiction which, if committed in this State, would constitute such a crime.
- I have been convicted of an offense graded by Title 2C of the New Jersey Statutes as a crime of the first, second, third or fourth degree, or any offense in any jurisdiction which, if committed in this State, would constitute such a crime as follows:

- 1. Crime of conviction: _____
- 2. Date of conviction: _____
- 3. Place of conviction: _____
- 4. Penalties imposed for the conviction: _____

**As an alternative, you may submit with the statement a copy of an official document that provides the above information. If you have been convicted of more than one criminal offense, such information about each conviction shall be provided. Records of expunged conviction(s) pursuant to chapter 52 of Title 2C of the New Jersey Statutes shall not be subject to disclosure.*

I certify the foregoing is a true and accurate statement.

(Signature of General Assembly Candidate)

(Printed or Typewritten Name of General Assembly Candidate)

(Residential Address of General Assembly Candidate)

(City or Town of General Assembly Candidate) (Zip Code)

DISCLOSURE STATEMENT OF CRIMINAL CONVICTION

Pursuant to P.L. 2004, chapter 26 the following statement must be completed and filed with the Nomination Petition

Please Check Applicable Box

I, the undersigned, hereby certify that in accordance with N.J.S.A. 19:23-15:

- I have not been convicted of any offense graded by Title 2C of the New Jersey Statutes as a crime of the first, second, third or fourth degree, or an offense in any jurisdiction which, if committed in this State, would constitute such a crime.
I have been convicted of an offense graded by Title 2C of the New Jersey Statutes as a crime of the first, second, third or fourth degree, or any offense in any jurisdiction which, if committed in this State, would constitute such a crime as follows:

- 1. Crime of conviction:
2. Date of conviction:
3. Place of conviction:
4. Penalties imposed for the conviction:

*As an alternative, you may submit with the statement a copy of an official document that provides the above information. If you have been convicted of more than one criminal offense, such information about each conviction shall be provided. Records of expunged conviction(s) pursuant to chapter 52 of Title 2C of the New Jersey Statutes shall not be subject to disclosure.

I certify the foregoing is a true and accurate statement.

(Signature of General Assembly Candidate)

(Printed or Typewritten Name of General Assembly Candidate)

(Residential Address of General Assembly Candidate)

(City or Town of General Assembly Candidate) (Zip Code)

EXHIBIT C

Begin forwarded message:

From: William Connolly <william.anthony.connolly@gmail.com>
Date: February 23, 2015 at 10:02:12 PM EST
To: John Traier <John@jtcपाल्.ком>
Cc: William Roca <wrocalaw@aol.com>, "Gov8040@aol.com" <Gov8040@aol.com>, "Ramon Leon (ramonleon45@hotmail.com)" <ramonleon45@hotmail.com>, "Kristen Corrado (kmc.corrado@verizon.net)" <kmc.corrado@verizon.net>, "Ayman Mamkej (mamkej@gmail.com)" <mamkej@gmail.com>, "Randy George (mavor@northhaledon.com)" <mavor@northhaledon.com>, "Darlene Post (darlenepost@optonline.net)" <darlenepost@optonline.net>, "heaven235@aol.com" <heaven235@aol.com>, "passaiccityrepublicanchairman@verizon.net" <passaiccityrepublicanchairman@verizon.net>, "carlos1126@aol.com" <carlos1126@aol.com>, "Peter Roos (peter.roos@gmail.com)" <peter.roos@gmail.com>, "Tom Magura (tommagura@yahoo.com)" <tommagura@yahoo.com>, "Ted Taukus (boroleader@hotmail.com)" <boroleader@hotmail.com>, "ednj@hotmail.com" <ednj@hotmail.com>, "Leonard#@APTEA.com" <Leonard#@aptea.com>, "Michael Marotta (Marottamichael@yahoo.com)" <Marottamichael@yahoo.com>, "Dan Jurkovic (njelderlawyer@yahoo.com)" <njelderlawyer@yahoo.com>, "Phil Barone (broker1w@aol.com)" <broker1w@aol.com>, "Marie Sieber (mmsieber@aol.com)" <mmsieber@aol.com>, "Rich Jasterzbski (RJASTERZBSKI@YAHOO.COM)" <RJASTERZBSKI@yahoo.com>, "George Decker (gddecker@optonline.net)" <gddecker@optonline.net>, "Barbara Roca (bsrplus4@aol.com)" <bsrplus4@aol.com>, "artbruce1970@gmail.com" <artbruce1970@gmail.com>, "jpituch@verizon.net" <jpituch@verizon.net>, mark.bonamo@politickernj.com, dooblin@northjersey.com, mma@njadvancemedia.com, stile@northjersey.com, Bergen Dispatch <info@bergendispatch.com>
Subject: Re: Your earlier email

Chairman Traier,

I am well aware that the ballot was a secret. I know this because no candidate was granted representation to witness the counting of votes. I am further aware, because when you first announced the result of the tally, as I recall you announced there were 21 votes. Dawn Cody, to the best of my recollection, informed you that we must have 23 votes.

In truth, I believe there must have been 25 votes cast. 22 Executive Committee in addition to the three from Paterson. As you continue to consider my representation of the Paterson County Committee to be "irrelevant" as you put it, or whether you believed, as you stated in a prior e-

mail, that you were intentionally throwing out another Paterson representative's vote, either way there were 25 ballots cast.

If you intend to claim Carlos Pagan is a liar, or you intend to claim that Scott Rumana instructed Ramon Leon to vote for John Capo, in an attempt to unseat Dave Russo, then go ahead and claim it. Otherwise, there is no legitimate way that the Paterson vote was tallied, even when you illegally remove my vote.

Philosophically, I will fight to my death to preserve the right of any person to vote for the candidate or candidates of their choosing. This is America, we believe in certain unalienable rights. Your apparent desire to preserve a certain outcome does not change my 50+ years of Republican beliefs.

As I was removed from the meeting, and made to stand in a parking lot in freezing temperatures, I do not know what business occurred in my absence. However, if you truly believed in the sanctity of the process, when you discovered that one ballot was not to your liking in terms of process, why did you not offer a chance to revote with a reiterated clarity of instruction? What motivated you, my friend for over four decades, to willingly throw out a vote rather than to put the right of the people first.

Indeed I believe our attorneys will be in contact, but this does not change how I feel about the events of Saturday. I believe that democracy trumps threats, allegations, rumors, lies, or any other form of voter intimidation or suppression.

Yours truly,

William A. Connolly
195 20th Ave. Apt. 6C
Paterson, NJ 07501

On Mon, Feb 23, 2015 at 10:48 AM, John Traier <John@jtcpallc.com> wrote:

Bill,

I will not answer how a certain person voted – that would be unethical because it was a secret ballot.

I will reiterate what I said in the previous email that Ramon Leon and Carlos Pagan voted for the same two individuals. . . unfortunately that makes your vote irrelevant in this case.

I sincerely hope that we can move forward to elect Republicans.

If you intend court action, it is probably better that we discuss matters through our attorneys.

From: William Connolly [mailto:william.anthony.connolly@gmail.com]

Sent: Monday, February 23, 2015 8:13 AM

To: John Traier

Cc: William Roca (Gov8040@aol.com); Ramon Leon (ramonleon45@hotmail.com); Kristen Corrado (kmc.corrado@verizon.net); Ayman Mamkej (mamkej@gmail.com); Randy George (mayor@northhaledon.com); Darlene Post (darlenepost@optonline.net); heaven235@aol.com; passaiccountyrepublicanchairman@verizon.net; carlos1126@aol.com; Peter Roos (peter.roos@gmail.com); Tom Magura (tommagura@yahoo.com); Ted Taukus (boroleader@hotmail.com); ednj@hotmail.com; Leonard#@APTEA.com; Michael Marotta (Marottamichael@yahoo.com); Dan Jurkovic (njelderlawyer@yahoo.com); Phil Barone (broker1w@aol.com); Marie Sleber (mmsleber@aol.com); Rich Jasterzbski (RJASTERZBSKI@YAHOO.COM); George Decker (gddecker@optonline.net); Barbara Roca (bsrplus4@aol.com); artbruce1970@gmail.com; jpituch@verizon.net

Subject: Re: Your earlier email

Chairman Traier,

I do not know this to be a fact, but I have been told there is photographic evidence that Carlos Pagan voted for Scott Rumana and John Capo. I will let the courts figure out the truth. I respect our 40+ years of friendship, and it is almost impossible for me to believe that you willingly cheated the vote. I believe there may be some mistake in how the votes were tallied.

Because I have received multiple e-mails from other people on this list expressing their support but wondering what my original e-mail was, I place it below:

Dear Fellow Republican,

I am one of three co-equal Republican Municipal Leaders elected by the Paterson Republican County Committee to represent them.

Yesterday morning (2/21/2015) there was a meeting of the Passaic County Republican Executive Committee for the purpose of voting to give the party line to various candidates for office.

When it came to the vote for Legislative District 40, my ballot was thrown out and not counted. I believe that this violated the civil rights of not only myself, but of the Paterson Republican County Committee whose membership I directly represent, and all the Republicans of Paterson, NJ by derivation.

The alleged reason for Paterson to have lost representation was that a rule was passed that each paper ballot, which consisted of three names and checkboxes, but had no further written

instructions, must contain two votes for two candidates, whereas any ballot in support of only one candidate would not count.

I have been 48 years continuously on the Paterson County Committee and I have never heard of or seen this rule adopted. In addition, I have undergone a mastoidectomy as a child, and have been hard of hearing in one ear ever since. There was chaos and commotion in the room all during the meeting, at one point Paterson's entire delegation was told to go stand in the parking lot in sub-freezing temperatures.

While discussions that morning took place over whether two of the three candidates would be allowed to bracket in the vote (also unprecedented), and may well have taken place regarding a requirement to vote for two, this was not clear to me.

As the paper ballot was left without instruction, and no written notice of procedure was distributed, I went off of 48 years of past practice and the firm belief in the democratic principle of voting for the candidate or candidates of one's choosing. I cast a single vote for one of the candidates.

When it came time to count the votes, I was informed that my ballot was thrown out for this reason. I do not believe it is lawful to dismiss the vote of Paterson, NJ in this way. It must be emphasized that the result of the entire election came down to a single vote, by throwing mine out, I believe the results of the election were tampered with.

I do not believe the actions taken are lawful or proper. I believe that my rights as well as the rights of all Paterson Republicans have been disregarded in order to get a preferred election outcome. For the Republican Party to thus disenfranchise the third biggest city in New Jersey demands comment.

Please take a moment to join me in defending the rights of County Committee people everywhere, as well as the underlying rights of our New Jersey Republicans. Call Passaic County Chairman John Traier at 201-723-5269 and demand a re-vote take place with unambiguous written instructions.

It isn't fair to the sizable Senior County Committee population, or to those of us with hearing impairments or other disabilities, to be discriminated against when it comes to voting procedure.

Sincerely,

William A. Connolly

195 20th Ave. Apt. 6C

Paterson, NJ 07501



On Sun, Feb 22, 2015 at 4:44 PM, John Traier <John@jtcpallc.com> wrote:

Bill,

I was sorry that you did not include me in the widely distributed email "My Account of the P.C.R.R.O. Rigging the District 40 Vote"

First, of all Bill, I had no idea it was your vote that was thrown out. I had assumed it was another party's vote. We would have to assume you are telling the truth but I have no way to verify that.

Paterson in fact did cast its vote and did not lose a vote. The other two leaders had in fact voted for the same persons otherwise there would have been a split vote. This did not happen.

Bill it is so hard to believe that you missed the directions. You were sitting immediately next to me on my left. When making my ruling that everyone must for vote two persons - which I had reiterated several times -- you had nodded your head and raised your hand. Sitting right next to me, I did not see you were confused or that could not hear me.

I had ruled that both candidates could not bracket. All were concerned that that may have wanted to vote for one of the incumbents and the challenger. I wanted to make sure that votes were cast for two candidates.

Again, since Assemblyman Rumana received everyone's vote, this ruling also did not make a difference.

Due to the uniqueness of the Paterson situation, which after three years, Paterson has still not resolved, I am sorry your vote did not count (if in fact yours was the one that was thrown out). But rest assured that Paterson's did.

It is always disappointing when our candidate does not win. As Chairman, I went out of my way to insure an honest election.

As far as I am concerned the vote stands, and we should at this point work for the election of our party's nominees.

As you call me on a regular basis, I look forward to hearing from you. After 40+ years of friendship, I look forward to your call.

John M. Traier CPA

Partner

Jimenez & Traier, LLC

Certified Public Accountants

155 Willowbrook Blvd.

Suite 350

Wayne, NJ 07470-7033

Phone (973) 778-8400

Fax (973)-785-0414

Cell (201)-723-5269

DISCLAIMER: The information in this message is confidential and may be legally privileged. It is intended solely for the addressee. Access to this message by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, or distribution of this

message, or any action or omission taken by you in reliance on it, is prohibited and may be unlawful. Please immediately contact the server if you have received this message in error. Thank you.

IRS CIRCULAR 230 DISCLOSURE: To comply with IRS regulations, we are required to inform you that unless expressly stated otherwise, any discussion of U.S. federal tax issues in this correspondence (including any attachments) is not intended or written to be used, and cannot be used, (i) to avoid any penalties imposed under the Internal Revenue Code, or (ii) to promote, market, or recommend to another party any transaction or matter addressed herein.

EXHIBIT D

DEL SARDO & MONTANARI

A LIMITED LIABILITY COMPANY

ATTORNEYS AT LAW

300 LACKAWANNA AVENUE
WOODLAND PARK, NJ 07424

(973) 786-8181

(973) 786-8182 - FACSIMILE

NEW YORK OFFICE

300 SUNRISE HIGHWAY
ROCKVILLE CENTRE, N.Y. 11870

AS CERTIFIED BY THE SUPREME
COURT OF NEW JERSEY AS A CIVIL
TRIAL ATTORNEY

DARREN J. DEL SARDO † J.
ddelsardo@ddsmlaw.com
MICHAEL J. MONTANARI
mmontanari@ddsmlaw.com

JAYNA B. PATEL
jpatal@ddsmlaw.com

† MEMBER OF NJ AND DC BAR

February 21, 2015

(Via Facsimile-973-638-1684 and Email-john.traier@pcrro.com)

Chairman John Traier

Passaic County Regular Republican Organization

1220 Hamburg Turnpike

Wayne, N.J. 07470

Re: Meeting of PCRRO Executive Committee- Vote on Assembly Candidates to run
under PCRRO Slogan

Dear Chairman Traier:

Please be advised that the undersigned has been retained to represent the interests of William Connolly, a Co-Chairman of the Republican Party of the City of Paterson. Mr. Connolly hereby challenges the vote that took place today with regard to the Assembly Candidates that will run under the Slogan of the Passaic County Regular Republican Organization ("PCRRO") in Legislative District 40. I request that copies of the ballots be preserved and copies forwarded to the undersigned for review.

First, the undersigned has been advised that a rule was passed this morning (for the first time in the history of the organization) that a municipality was not permitted to "bullet vote" any one candidate. The aforementioned rule is contrary to the right to endorse candidates of its'

choice by the Republicans of Paterson, New Jersey. The aforementioned right is guaranteed by both the Constitution of the United States of America, the State of New Jersey and Title 19. The City of Paterson's vote should have been counted as a vote for John Capo and Scott Rumana. The rule was that each municipality must cast a vote for two candidates. Not that each individual must cast a vote for two candidates. The votes are counted by Municipality not individual, therefore, Paterson's vote should have been counted. An unjust and unilateral decision was made not to count the vote for John Capo due to politics, not process. A choice was made not to accept one vote over another in the City of Paterson that gave David Russo an unfair and unlawful advantage.

Second, prior to today, you assured several municipal leaders that they would be permitted to "bullet vote". The Totowa Republican Organization along with municipal leaders of other municipalities discussed the vote that was to be cast today between the Leaders of the afore-mentioned organizations and made a decision on how their votes were to be cast. The unannounced and unprecedented change in the voting process that came about the morning of the vote severely prejudiced the interests of the Republican Residents in the Borough of Totowa as well as republicans across Passaic County.

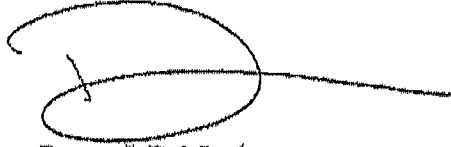
Third, Mr. Connolly is a Senior Citizen and is hearing impaired. He regularly relies upon documents and writings as opposed to speech due to his life-long disability. He is willing to testify under oath that he did not hear the change of the rules when it was allegedly orally conveyed this morning. He has advised the undersigned that there was commotion in the room and individuals were talking the entire time which made it nearly impossible for him to hear and/or take notice of any announcements. Not counting Mr. Connolly's vote and denying his ability to re-vote does not protect the interests and the right to vote of the disabled and our Senior Citizens and violates the Civil Rights of Mr. Connolly and all Republicans in the City of Paterson. He is only seeking a simple accommodation based on his disability.

Lastly, Mr. Connolly is only asking that his vote be counted so that process and constitutional protections prevail over politics. Mr. Connolly calls upon you as Chairman of the County Republican Party to do what is in the interests of justice and fairness as protected by law and count his vote and Paterson's Vote. The laws of the State of New Jersey always side on a party's right to vote.

In the event you decide not to count Paterson's vote as a vote for John Capo and Scott Rumana, he is prepared to file a Complaint in the Superior Court of New Jersey or Federal Court based on several violation of his Civil Rights early next week. He will seek all remedies that he is entitled to as a matter of law. He will be forced to call upon the leaders of the Passaic County Regular Republican Organization to attend depositions where all parties will be placed under oath and various questions of the sudden amendments of the voting process will be called into question. He is particularly interested in all conversations that all Party Leaders engaged in prior to this morning that lead to the decision to change the rules.

Kindly advise if you are inclined to permit process over politics in the interest of all
Republicans that reside in Passaic County.

Very truly yours,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

Darren J. Del Sardo

DD/

EXHIBIT E



William Connolly <william.anthony.connolly@gmail.com>

My Account of P.C.R.R.O. Rigging the District 40 Vote

William Connolly <william.anthony.connolly@gmail.com>

Sun, Feb 22, 2015 at 10:58 AM

To: William Connolly <william.anthony.connolly@gmail.com>

Bcc: lovi@optonline.net, jcromie@connellfoley.com, smitty195@optimum.net, pashr@optonline.net, jmcswiggan@optonline.net, vincebarra@aol.com, pylie@aol.com, lizwhite720@aol.com, abernstein@lbklaw.com, lamonicapash@optonline.net, wizfam@optonline.net, lacabster@aol.com, swistann@yahoo.com, dcatuogno@formanlaw.com, cps@shotmeyerbros.com, paddlady@aol.com, dbonagura@verizon.net, KV@lan-nj.com, aconway@dialamerica.com, chuck@shotmeyerbros.com, fbivona@aol.com, cjxkahwaty@gmail.com, clota60621@aol.com, momnjack@aol.com, joefk@optonline.net, pmdee@aol.com, dshotmeyer@gmail.com, HHK07423@aol.com, leann@raimondihg.com, porourke@marinercapital.com, keltina@aol.com, prorty@optonline.net, rrslaw@aol.com, dktoast@troast.com, mlennon7@cs.com, budohagan@earthlink.net, elkurth@aol.com, mapman40@aol.com, jimd113@aol.com, lawrein@aol.com, al@villadom.com, emv333@hotmail.com, feickjr@yahoo.com, tpwalker@aol.com, scottpruikisma@aol.com, nancy-peat@atg.com, boomer81103@optonline.net, jjconsi@optonline.net, tom@tomflynnagency.com, melanie.batley@hotmail.com, russo_dave@yahoo.com, rjadamiak@aol.com, todd@anwcrestwood.com, coghlanwalsh@cs.com, ambrennecke@yahoo.com, desciolaro@gmail.com, kw11@optonline.net, frankpalladino1@optonline.net, deb816@verizon.net, mnandjdb@verizon.net, toveyone@msn.com, AnthonCollTech@gmail.com, cfarricker@westernworld.com, bbgreg@optonline.net, Jetmech79@optonline.net, lou.graglia@everestre.com, kporro@wellslaw.com, bodybag455@aol.com, ed@chakonispettit.com, cdephillips@gibbonslaw.com, jtorack@optonline.net, christine@gobeckersgo.com, Brianh8589@hotmail.com, Lil.sis.4k@gmail.com, rudybmilk@aol.com, dmcnama4@ford.com, schuhjoe@verizon.net, hollandhills@optonline.net, tmadiganvzw@gmail.com, Conservative_caucus@verizon.net, ceskainc@aol.com, SGCLARKE@optonline.net, kjr@hmsglobalholdings.com, haakonjepsen@mac.com, douglaschristie@aol.com, yudins@att.net

Dear Fellow Republican,

I am one of three co-equal Republican Municipal Leaders elected by the Paterson Republican County Committee to represent them.

Yesterday morning (2/21/2015) there was a meeting of the Passaic County Republican Executive Committee for the purpose of voting to give the party line to various candidates for office.

When it came to the vote for Legislative District 40, my ballot was thrown out and not counted. I believe that this violated the civil rights of not only myself, but of the Paterson Republican County Committee whose membership I directly represent, and all the Republicans of Paterson, NJ by derivation.

The alleged reason for Paterson to have lost representation was that a rule was passed that each paper ballot, which consisted of three names and checkboxes, but had no further written instructions, must contain two votes for two candidates, whereas any ballot in support of only one candidate would not count.

I have been 48 years continuously on the Paterson County Committee and I have never heard of or seen this rule adopted. In addition, I have undergone a mastoidectomy as a child, and have been hard of hearing in one ear ever since. There was chaos and commotion in the room all during the meeting, at one point Paterson's entire delegation

was told to go stand in the parking lot in sub-freezing temperatures.

While discussions that morning took place over whether two of the three candidates would be allowed to bracket in the vote (also unprecedented), and may well have taken place regarding a requirement to vote for two, this was not clear to me.

As the paper ballot was left without instruction, and no written notice of procedure was distributed, I went off of 48 years of past practice and the firm belief in the democratic principle of voting for the candidate or candidates of one's choosing. I cast a single vote for one of the candidates.

When it came time to count the votes, I was informed that my ballot was thrown out for this reason. I do not believe it is lawful to dismiss the vote of Paterson, NJ in this way. It must be emphasized that the result of the entire election came down to a single vote, by throwing mine out, I believe the results of the election were tampered with.

I do not believe the actions taken are lawful or proper. I believe that my rights as well as the rights of all Paterson Republicans have been disregarded in order to get a preferred election outcome. For the Republican Party to thus disenfranchise the third biggest city in New Jersey demands comment.

Please take a moment to join me in defending the rights of County Committee people everywhere, as well as the underlying rights of our New Jersey Republicans. Call Passaic County Chairman John Traier at 201-723-5269 and demand a re-vote take place with unambiguous written instructions.

It isn't fair to the sizable Senior County Committee population, or to those of us with hearing impairments or other disabilities, to be discriminated against when it comes to voting procedure.

Sincerely,

William A. Connolly
195 20th Ave. Apt. 6C
Paterson, NJ 07501