

SAMUEL LASHMAN
ATTORNEY AT LAW
119 N. Hanover Ave.
Margate, New Jersey 08402
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February 11, 2020

Hon. Julio L. Mendez, A.J.S.C.
Superior Court of New Jersey
Atlantic County Civil Courthouse
1201 Bacharach Blvd.
Atlantic City, NJ 08401

Re: Atlantic City Democratic Committee v. Atlantic City Residents for Good Government, Inc., et als, Docket No. ATL-L-496-20 PW

Dear Judge Mendez:

Per my conversation with your chambers I am enclosing a courtesy copy of the filed papers in this matter along with a Supplemental Certification in support of the Order to Show Cause containing certifications which have some confidential information and names some of whom are minors and which was not filed on eCourts.

The matter concerns the Petition for Change of Government in Atlantic City with an election scheduled for March 31, 2020. I am requesting a stay of the election and due to the need for the Clerk to print ballots and make other arrangements for the election I would ask that you or another Judge please review the matter in the next few days so that if the election is postponed there is not unnecessary work done. Alternately the matter would have to be heard and decided before March 31st.

At the same time I am attempting to deliver copies of all papers to the Clerk of Atlantic City and Robert McDevitt who is a member of the Petition Committee or PAC I believe sponsored the question.

Thank you again for your courtesy.

Respectfully,

/s/ Samuel Lashman
Samuel Lashman, Esq

cc: Clerk of Atlantic City
Robert McDevitt
AC Democratic Committee

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February 11, 2020

Hon. Julio Mendez, A.J.S.C. and
Clerk Superior Court
Superior Court of New Jersey
1201 Bacharach Blvd.
Atlantic City, NJ 08401

Re: Atlantic City Democratic Committee v. Atlantic City Residents for Good Government, Inc., Unnamed Petition Committees 1-2 being fictitious names, Clerk of City of Atlantic City in her official capacity, and John Does 1-25, individuals who were circulators or others being fictitious, Docket No. ATL- tba -20 PW

Enclosed please find the following courtesy copies:

Complaint in lieu of Prerogative Writ with Verification
Order to Show Cause
Preliminary Order
Letter Brief
Certifications of MD Morshed and Muhammad Zia
Certification of Samuel Lashman regarding confidential items not filed on eCourts

This matter involves a challenge to a Change of Government Petition filed with the City of Atlantic City and approved for an election. The Plaintiff challenges the validity of the Petition among other things. The election is scheduled for March 31, 2020 unless stayed.

Respectfully, Plaintiff requests entry of an order for Stay and an expedited hearing along with a hearing on the Order to Show Cause.

Fees have been paid through eCourts but due to confidential information on the supplemental certification I have decided to file the hardcopy only with Your Honor's chambers until further notice.

As always thank you for your courtesy. If the Court or Clerk's office has any questions kindly contact me. In the meantime I will attempt to deliver copies of all but the Certification containing confidential information with opposing parties/counsel.

Respectfully,

/s/ Samuel Lashman

Samuel Lashman, Esq.

Samuel D. Lashman, Esq. (ID No. 024801988)
119 N. Hanover Ave.
Margate, N.J. 08402
(609) 344-7755
Attorney for Plaintiff A.C. Democratic Committee

Atlantic City Democratic Committee,	:	SUPERIOR COURT OF NEW JERSEY
Plaintiff,	:	ATLANTIC COUNTY
vs.	:	LAW DIVISION
	:	
Atlantic City Residents for Good	:	CIVIL ACTION
Government, Inc., Unnamed Petition	:	
Committees 1-2, being fictitious names,	:	DOCKET NO.
Clerk of City of Atlantic City in her official	:	
capacity, and John Does 1-25, individuals	:	VERIFIED COMPLAINT
who were circulators or others being	:	IN LIEU OF PREROGATIVE WRIT
fictitious names.	:	
Defendants.	:	

Atlantic City Democratic Committee c/o Gwendolyn Lewis Chairwoman 1502 Penrose Ave., Atlantic City, N.J. 08401 Plaintiff by way of complaint says:

FIRST COUNT

1. Plaintiff is a political organization representing the Democratic Party in the City of Atlantic City, N.J., it has 42 members elected every two years with a man and a woman representing each of Atlantic City's 21 precincts and upon information and belief approximately 10,000 Registered Democrats.
2. Atlantic City Residents for Good Government Inc. ("ACRGG") is a New Jersey Political Action Committee registered with the New Jersey Election Law Enforcement Commission and is located at 1 Convention Blvd., Suite 2, No. 328, Atlantic City, NJ 08401 also known as "Atlantic

City Residents for Good Government.”

3. The organizers of ACRGG were Farook Hossain, Bob McDevitt, Cristian Moreno-Rodriguez and Felicia Potts.

4. Unnamed Petition Committees 1-2 (“UPCs 1-2”) are fictitious names of committees which circulated and or submitted petitions to change the form of government in Atlantic City to a Council Manager form pursuant to N.J.S.A. 40:79-1 et seq., the exact names of the Committees and or sponsors not being on the petitions the true names and addresses are unknown at this time. In addition two forms of petitions were utilized making it unknown whether or not there was more than one committee.

5. Defendant Clerk of the City of Atlantic City is Paula Geleti who is joined in her official capacity as the person who certified the Petition, scheduled the Special Election and would conduct the Special Election on the question submitted.

6. John Does 1-25 being fictitious names are persons whose true names are currently unknown who should be parties to this action because they were circulators of the Petition, or individual pages, and used illegal, improper and fraudulent means to obtain signatures.

7. On December 11, 2019 Atlantic City Residents for Good Government, Unnamed Petition Committees 1-2 and or Bob McDevitt submitted change of government petition(s) to the Clerk of the City of Atlantic City containing approximately 3,033 signatures and about 1,670 pages. It is believed that Atlantic City Residents for Good Government, Inc. left out the “Inc.” in some of its paperwork but is the same entity however there may be more than one committee, e.g. Defendant UPCs 1-2 or individuals who actually submitted the petitions. See exhibit “C.”

8. The stated question and purpose of the petition was:

Shall subtitle 5 of the title Municipalities and Counties of the Revised Statutes (N.J.S.A.

40:79-1 et seq.), providing for the Municipal Manager Form of Government, with five (5) council members all to be elected at-large for concurrent terms at elections held in May, with the mayor elected from among the council members, and a municipal manager appointed by the municipal council, be adopted by the City of Atlantic City?

9. On or about January 8, 2020 the Clerk of Atlantic City rejected the Petition, see exhibit “D.”
10. On or about January 16, 2020 the Clerk accepted the Petition and scheduled a Special Election to be held on March 31, 2020 in the City of Atlantic City, exhibit “E.”
11. The City of Atlantic City currently operates under the Faulkner Act as a Mayor Council form of government pursuant to N.J.S.A. 40:69A-1 et seq. with 6 wards, 6 ward council persons, 3 at-large council persons, and 1 Mayor elected at-large.
12. Sample petition pages are attached hereto as exhibits “A” and “B.” The basic question is similar. However Type “A” petitions are made up of about 6-7 pages and contain space for 50 signatures and a circulator and notary affidavit. Type “B” petitions are one page with a title and with room for 5 signatures and the circulator affidavit with notary. See exhibits “A” and “B” attached hereto redacted.
13. Neither the Committee members, any sponsors nor the ACRGG committee is listed on the petition as the sponsor.
14. The space for the circulator is empty so that it does not have to be filled in before voters sign the petition meaning that the voters are not informed of the sponsor, committee or circulator before signing which is misleading or concealing.

COUNT ONE - Petition is Legally and Facially Defective

15. Plaintiff repeats each and every allegation of the preceding Count(s) and paragraphs above and incorporates the same into each and every other Count and paragraph herein as if set forth at

length herein.

16. The petition is defective as a matter of law.

17. The petition in question was required, as a matter of law to follow some of the prerequisites of N.J.S.A. 40A :69A-186 which sets out requirements for initiatives for Faulkner Act municipalities namely including the circulator on each page of the petition.

18. The subject of the Petition requests a change in the form of government to the Council Manager form of government under N.J.S.A. 40:79-1 et seq.

19. N.J.S.A. 40:79-1 et seq. expressly sets forth the forms for petition in a recall , i.e. N.J.S.A. 40:84-12 and to abandon the Council Manager form of government , N.J.S.A. 40:85-1 et seq. but, provides no other description for the form of petition to change the existing form of government into a Council Manager form of government.

20. The petition requirements for identification of circulators should be read in pari materia with N.J.S.A. 40:79-1 et seq. or with the Faulkner Act N.J.S.A. 40A:69A-186 and other provisions that require identification of the circulators and sponsors on its face as does N.J.S.A. 40:84-12, 40:85-1 or 40A:69A-186.

21. In this case no sponsors or committee was actually named or identified on the petition forms and in this case the omission was misleading especially since there were two formats.

22. The petitions are required to have the circulator listed and in fact do have space for the circulator.

23. The petitions are required to be of uniform type to be legal which they are not since there are Type “A” and Type “B” formats.

24. Only one format is acceptable for one committee at a time.

25. If more than one entity submitted a set of petitions only one can be accepted.

26. Upon information and belief after December 11, 2019 the City Clerk continued to accept additional pages and the circulators or committees continued to obtain additional signatures.

27. The petition is defective because it is believed that additional pages were accepted.

28. There is no 10 day corrective period under 40:79-1 et seq., the Petition needs to be complete when submitted.

29. In some cases the notary certificate was attached to more than one set of petition pages which is a fatal defect for those pages.

30. In some cases the true circulators were not registered voters.

31. In some cases minors were circulators.

32. Circulators were required to be New Jersey registered voters at the time they obtained signatures.

33. Petition pages circulated by minors and or non voters are void.

34. The Clerk ruled in certain cases that some pages of the Petition were defective because the Notary improperly executed the affidavit, or executed it as the circulator, see letter of January 9, 2020. In addition the Clerk invalidated signatures in other cases because the notary was not in good standing at the time of notarization. The Clerk's acceptances and rejections have not been released to Plaintiff and therefore are subject to challenge or are arbitrary and capricious.

35. The City of Atlantic City Clerk's Office has not released a complete copy of the pages submitted by ACRGG, UPCs 1-2 or any other entity which submitted the Petition or pages of the Petition and the Plaintiff is entitled as a matter of law to review the materials in the Clerk's office as well as materials used in the signature gathering effort as regular election materials.

36. Many or most circulators were paid to obtain signatures on the basis of being paid by obtaining a minimum number, three (3) signatures, which is improper and or illegal just as if a

campaign worker was paid to obtain mail in ballots and was paid per ballot obtained or to register voters and was paid per voter registered. Red Cloud Strategies, LLC was a consultant and or vendor for ACRGG and is believed to have hired, managed and or paid circulators on the basis of signatures the circulators obtained rather than hourly. See exhibits “F,” “G,” and “H.”

36A. Any confidentiality provisions regarding circulators or solicitations on a public petition is void, against public policy, contrary to Campaign Finance Laws and or illegal. (“Ryan” named in exhibit H is believed to be the same Ryan on check 148, exhibit F, and Red Cloud Strategies is on check 148, among others.)

37. Petitions where the circulator was paid per signature are void and invalid and or the entire Petition is void because it was improperly obtained.

38. The number of other deficiencies, irregularities and illegalities is still under investigation and the examples above are representative not exclusive of the deficiencies which are subject to what continuing investigation and discovery will show. The other deficiencies include crossouts, deletions and other markings invalidating pages of the Petition.

39. The City of Atlantic City is also subject to the Municipal Recovery and Stabilization Act, N.J.S.A. 52:27BBBB-1 et seq. at all relevant times.

40. Pursuant to the above cited act, the Petition is at best advisory and non binding. Further “dissolving, terminating, transferring, abolishing, or otherwise disposing of any municipal authority, board, commission...” is impossible without approval of the Director of the Local Finance Board, id. section 5(b).

41. Pursuant to N.J.S.A. 19:37-1 et seq., Elections, Non binding referenda are to be scheduled for the general election which will be held in November, not a special election and the Council Manager Plan conflicts with Election Law and the Municipal Recovery and Stabilization Act and

is therefore legally void or the election must take place in November.

42. In the alternative a declaratory judgment on the effect of conflicting laws is requested pursuant to the Declaratory Judgment Act, N.J.S.A. 2A:16-51 et seq.,

WHEREFORE, Plaintiff demands relief as follows:

- A. The Court Issue an Order setting a suitable time and place for a hearing this complaint;
- B. That at the hearing, the Court determine if the petitions are legally deficient;
- C. That the Court determine whether malconduct, fraud or corruption occurred in obtaining signatures and the legality or illegality of any signatures and the Petition;
- D. That the Court, after the hearing, declare the Petition null and void, be set aside and election cancelled;
- E. That all books, papers, documents and forms relating to the Petition in possession or control of Defendants, the City of Atlantic City and its Clerk, ACRGG, JPCs 1-2, John Does 1-25 or other entities with possession of the same be maintained and produced for discovery and an order be entered permitting Plaintiff discovery, including on Red Cloud Strategies and declare its “Nondisclosure Agreement” null and void, and for inspection and copying of the documents and materials upon an expedited schedule to be determined by the Court including a schedule for production of witnesses and their depositions;
- F. An Order for such other relief as the Court deems reasonable and just.

SECOND COUNT - Fraud

43. Plaintiff repeats each and every paragraph and allegation of the First Count above and incorporates the same as if set forth at length herein into each and every other paragraph and Count of the Complaint.

44. ACRGG, UPCs 1-2 their committee members and the circulators, and John Does 1-25 are

liable for FRAUD in that the entire petition gathering process was so replete with errors, intentional misconduct, concealment, misrepresentations and other malconduct that the entire Petition is void.

45. Specifically ACRGG, UPCs 1-2 their committee members and the circulators, and John Does 1-25 and defendants misrepresented the contents of the petition by concealing and omitting their names as sponsors or their roles in obtaining signatures. See exhibit "I" badges worn by circulators identify Roselle and Linden Democratic Committees not ACRGG, UPCs or Red Cloud Strategies, LLC the employers.

46. In certain cases the Notary signed as the circulator which was fraud.

47. In certain cases the actual circulators were not persons who signed the Petition or represented themselves as the circulators.

48. In certain cases the circulators lied or misrepresented their identities.

49. In certain cases to induce voters to sign the contents of the petition was misrepresented.

50. In certain cases ACRGG, UPCs 1-2 their committee members knowingly used minors and ineligible persons to circulate the petition.

51. ACRGG, UPCs 1-2 and or their committee members concealed the true identities of the actual circulators fraudulently.

52. In certain cases the signatures were forged or were not the persons whose names and signature was given, in one case the person has been in living in the State of Florida for years and has not returned to Atlantic City and could not have signed the Petition.

53. In at least one case the address given for the circulator does not exist and it was known to be given fraudulently.

54. Some petitions were circulated correctly but then additional signatures were fraudulently

appended to the correct signature pages or other persons than the circulator who was correctly listed obtained additional signatures.

55. Signatories have been shown photos of circulators listed on the Petition and reported to the Plaintiff's investigator that the correct circulator was not the same person listed in writing.

56. It is believed that certain petition pages were left unattended for voters to sign which the circulators then fraudulently or falsely represented they personally witnessed.

57. The use of a "Nondisclosure Agreement" in gathering signatures is indicative of Fraud and illegal methods, is illegal and void ab initio.

58. The misstatements, concealment, errors and omissions by ACRGG, its committee members, the circulators and defendants were material, knowing and intentional.

59. As a result of the misstatements, concealment, errors and omissions by ACRGG, UPCs 1-2 their committee members and the circulators, and John Does 1-25 and or other defendants the signers were induced to sign petitions they would not have otherwise signed.

60. There was a pattern of fraud so rampant as to cause doubt in whole petition and process and among other things:

- (a) illegal or improper signatures were collected;
- (b) signatures which should have been rejected were accepted some not being eligible voters;
- (c) signatures were not of the persons listed because they were either forged or the true persons were not the signers who were absent from the State;
- (d) some affidavits were false;
- (e) names and addresses given for signatories were false, in that those addresses do not exist or the persons did not sign the petitions.

61. As a result of these fraudulent and improper activities, errors, mistakes and problems which a continuing investigation will disclose, the basic safeguards of the petition process were denied and the Petition was procured fraudulently.

62. The errors, mistakes and irregularities set forth above are representative of the fraud and errors in the Petition and are not exclusive since Petitioner has not completed its investigation and Plaintiff hereby reserves the right to supplement, amend and plead additional claims as they arise.

63. As a result fraudulent signatures were obtained and wrongly approved and a Special Election has been fraudulently called.

WHEREFORE, Plaintiff demands relief as follows:

- A. The Court Issue an Order setting a suitable time and place for a hearing this complaint;
- B. That at the hearing, the Court determine the Petition is legally deficient;
- C. That the Court determine whether malconduct, fraud or corruption occurred in obtaining signatures and the legality or illegality of signatures;
- D. That the Court, after the hearing, declare the Petition be set aside and election cancelled;
- E. That all books, papers, documents and forms relating to the Petition in possession or control of Defendants, the City of Atlantic City and its Clerk, ACRGG, JPCs 1-2, John Does 1-25 or other entities with possession of the same be maintained and produced for discovery and an order be entered permitting Plaintiff discovery, including on Red Cloud Strategies and declare its “Nondisclosure Agreement” null and void, and for inspection and copying of the documents and materials upon an expedited schedule to be determined by the Court including a schedule for production of witnesses and their depositions;
- F. An Order for such other relief as the Court deems reasonable and just.

THIRD COUNT - Civil Rights

64. Plaintiff repeats each and every paragraph and allegation of the First Count above and incorporates the same as if set forth at length herein into each and every other paragraph and Count of the Complaint.

65. The form of government, Council Manager, N.J.S.A. 40:79-1 et seq. is unconstitutional as it would be implemented in the City of Atlantic City.

67. The City of Atlantic City currently contains 6 wards with council members elected from each ward. In addition the Mayor and 3 council members are elected at large.

68. Under the plan of the petition all Council Members would be elected on an at large, or city wide basis.

69. Atlantic City is home to a large number of citizens from diverse racial, social and ethnic groups and in fact no one group constitutes a majority group in the City.

70. If all Council Members were elected on an at large basis numerous citizens would lose their voice and representation in government.

71. The present City council contains 1 Hispanic Member, 2 South Asians, 2 Caucasians and 4 African Americans.

72. The neighborhoods of the City tend to have one or two groups which do form majorities in their neighborhoods but are not of sufficient size that those groups would be able to elect a Council Member on an at large basis and the form of government proposed uniquely disenfranchises numerous groups.

73. As an example there is only one Hispanic Council Member although Hispanics represent

30% of the population.¹

74. That would instead tend to equate to two council representatives out of nine on a percentage of population basis.

75. The South Asian representatives would most likely not be able to be elected due to language barriers and other circumstances on a City Wide Basis. Jimmy Cheung who previously represented the 5th ward was the first Council Member of Chinese ethnic descent would have been unable on an at large basis most likely to be elected.

76. At large districts under the Federal Voting Rights Act of 1965 (52 U.S.C. § 10101 et seq.) are inherently suspect and discriminatory especially when going from a precinct district to an at large district.

77. Enactment of the petition and institution of 1 at-large city-wide voting district would be contrary to the Civil Rights of the people of Atlantic City and contrary to 42 U.S.C. 1983 and or the New Jersey Law Against Discrimination N.J.S.A. 10:6-1 et seq. which this Court has jurisdiction to enforce.

78. In the alternative the question presents a re-districting plan which would do away with all wards. Given that the U.S. Census will take place this year, 2020, and new districts will be drawn

¹See https://en.wikipedia.org/wiki/Atlantic_City,_New_Jersey#Demographics

As of the 2010 United States Census, there were 39,558 people.... The racial makeup of the city was 26.65% (10,543) White, 38.29% (15,148) Black or African American, 0.61% (242) Native American, 15.55% (6,153) Asian, 0.05% (18) Pacific Islander, 14.03% (5,549) from other races, and 4.82% (1,905) from two or more races. Hispanic or Latino of any race were 30.45% (12,044) of the population. [citing DP-1 – Profile of General Population and Housing Characteristics: 2010 for Atlantic City city, Atlantic County, New Jersey, United States Census Bureau. Accessed January 12, 2012; <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>]

for New Jersey election districts based on the results, the Court does have jurisdiction to rule on whether a single at large district is permissible.

WHEREFORE, Plaintiff demands relief as follows:

- A. The Court Issue an Order setting a suitable time and place for a hearing this complaint;
- B. That at the hearing, the Court determine if the petitions are legally deficient;
- C. That the Court determine that the Petition is a violation of the Civil Rights of the people of the City of Atlantic City, illegal and Unconstitutional;
- D. An Order for such other relief as the Court deems reasonable and just including costs and fees.

NOTICE PURSUANT TO RULES 1:5-1(a) and 4:17-4(c)

PLEASE TAKE NOTICE that pursuant to the above-cited Rules, the undersigned attorney(s) demand that parties serving pleadings and interrogatories and receiving responses thereto provide the undersigned attorneys with copies of the pleadings, interrogatories, documents, papers and materials received from other parties to this suit.

TAKE FURTHER NOTICE that this is a continuing demand.

SAMUEL LASHMAN, ESQ.

Dated: February 10, 2020

/s/ Samuel Lashman
Samuel Lashman, Esq

CERTIFICATIONS PURSUANT TO R. 4:5-1, etc,

Samuel Lashman, Esq., pursuant to R. 1:4-5 hereby certifies as follows:

1. All parties who are indispensable to the within action have been named to the best of my information, knowledge and belief pursuant to Rules 4:28 and 4:29 except as to UPCs 1-2 anJohn Does 1-25.

2. The matter in controversy is not the subject of any other actions pending or contemplated, either in court or in any type of arbitration or alternate dispute resolution, to the best of my information, knowledge and belief except that a Federal Court Action is contemplated in the event this Court does not have or exercise Jurisdiction of all grounds.

3. I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

4. Pursuant to Rule 4:69-4 it is not believed any transcripts of meetings are necessary.

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

SAMUEL LASHMAN, ESQ.

Dated: February 10, 2020

/s/ Samuel Lashman
Samuel Lashman, Esq

CERTIFICATION OF SAMUEL LASHMAN

1. I, Samuel Lashman, of full age certify as follows:
2. I am the attorney for Plaintiff in the above captioned matter.
3. Copies of documents obtained from investigation are attached to the complaint and are redacted copies of such information provided to me from the investigation of the Petition including copies of sample pages of the Petition and other information, without limitation as to other evidence to be produced, to illustrate specific facts and types of problems and incidents alleged in the amended complaint. Copies of statements in support of the facts are not being filed and may contain confidential information.
4. Copies of exhibits with names of voters, signatures or similar information, if any, is redacted, is not being publicly filed and an unredacted copy will be provided to Defendants upon appropriate Order of the Court.

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

Dated: 2/10/20

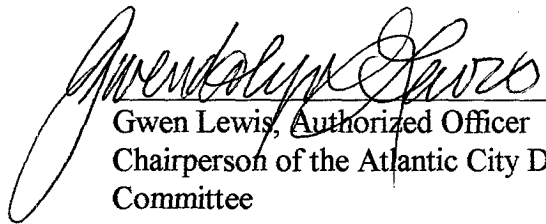
/s/ Samuel Lashman
Samuel Lashman

VERIFICATION OF GWENDOLYN LEWIS

1. I, Gwendolyn Lewis, of full age, am the Chairwoman of the Plaintiff in the above captioned matter.
2. I have read the foregoing Complaint and am familiar with the facts alleged therein.
3. All of the allegations therein are true to the best of my knowledge, information and belief.

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

Dated:


Gwen Lewis, Authorized Officer
Chairperson of the Atlantic City Democratic
Committee

PETITION TO ADOPT MUNICIPAL MANAGER FORM OF GOVERNMENT

We, the undersigned, hereby request that an election be held in the City of Atlantic City upon the following question: Shall subtitle 5 of the title Municipalities and Counties of the Revised Statutes (N.J.S.A. 40:79-1 et seq.), providing for the Municipal Manager Form of Government, with five (5) council members all to be elected at-large for concurrent terms at elections held in May, with the mayor elected from among the council members, and a municipal manager appointed by the municipal council, be adopted by the City of Atlantic City?

1. **REDACTED**
Print Name _____ Residence Address (Number and Street) _____
Signature _____ City Zip _____

2. _____
Print Name _____ Residence Address (Number and Street) _____
Signature _____ City Zip _____

3. _____
Print Name _____ Residence Address (Number and Street) _____
Signature _____ City Zip _____

4. _____
Print Name _____ Residence Address (Number and Street) _____
Signature _____ City Zip _____

5. _____
Print Name _____ Residence Address (Number and Street) _____
Signature _____ City Zip _____

AFFIDAVIT OF PETITION CIRCULATOR

JAYESH K. SODHA
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 1/23/2023

State of New Jersey
County of Atlantic City

I, **REDACTED**, being duly sworn, upon my oath state that I am the only person who personally circulated this paper; that all of the signatures appended hereto were made in my presence; and that I believe said signatures to be the genuine signatures of the persons whose names they purport to be.

Sworn and subscribed to before me this
REDACTED day of **REDACTED**, 2019

REDACTED
Signature of Circulator

Residence Address of Circulator (Number and Street)

City, State Zip of Circulator


Notary Public / Attorney At Law, State of New Jersey

We, the undersigned, hereby request that an election be held in the City of Atlantic City upon the following question: Shall subtitle 5 of the title Municipalities and Counties of the Revised Statutes (N.J.S.A. 40:79-1 et seq.), providing for the Municipal Manager Form of Government, with five (5) council members all to be elected at-large for concurrent terms at elections held in May, with the mayor elected from among the council members, and a municipal manager appointed by the municipal council, be adopted by the City of Atlantic City?

REDACTED

Print Name

REDACTED

Signature

REDACTED

Residence Address (Number and Street)

A.C. 08401

City

Zip

2.

Print Name

Residence Address (Number and Street)

Signature

City

Zip

3.

Print Name

Residence Address (Number and Street)

Signature

City

Zip

4.

Print Name

Residence Address (Number and Street)

Signature

City

Zip

5.

Print Name

Residence Address (Number and Street)

Signature

City

Zip

6.

Print Name

Residence Address (Number and Street)

Signature

City

Zip

20

Print Name

Residence Address (Number and Street)

Signature

City

Zip

21

Print Name

Residence Address (Number and Street)

Signature

City

Zip

22

Print Name

Residence Address (Number and Street)

Signature

City

Zip

23

Print Name

Residence Address (Number and Street)

Signature

City

Zip

24

Print Name

Residence Address (Number and Street)

Signature

City

Zip

49. _____

Print Name

Residence Address (Number and Street)

Signature

City

Zip

50. _____

Print Name

Residence Address (Number and Street)

Signature

City

Zip

AFFIDAVIT OF PETITION CIRCULATOR

State of New Jersey
County of Atlantic

I, Rhashonna C. Cosby, being duly sworn, upon my oath state that I am the only person who personally circulated this paper; that all of the signatures appended hereto were made in my presence; and that I believe said signatures to be the genuine signatures of the persons whose names they purport to be.

Sworn and subscribed to before me this

13 day of September, 2018

Rhashonna C. Cosby

Signature of Circulator

16 General Highway Ct
Residence Address of Circulator (Number and Street)

Elizabeth NJ, 07202
City, State Zip of Circulator

Notary Public / Attorney At Law, State of New Jersey

**RHASHONNA C. COSBY
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires April 7, 2021**



City of Atlantic City
Office of the City Clerk
Petition to Adopt Municipal Manager Form
of Government
Receipt

I, PAULA GELETEL, CITY CLERK

Do hereby certify I have received the following
petitions from:

Atlantic City Residents for Good Government

1,670 Signature Pages
consisting of 3,033 Signatures

Signed Paula Geleitel

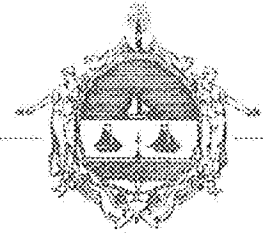
Date 12/6/08

EXHIBIT "C"

CITY OF ATLANTIC CITY

OFFICE OF THE CITY CLERK

City Hall - Room 704
1301 Bacharach Boulevard
Atlantic City, NJ 08401-4603
Office: (609) 347-5510
Fax: (609) 347-6408



PAULA GELETEI, FMC, CMC
City Clerk

January 08, 2020

Mr. C. Robert McDevitt
Atlantic City Residents for Good Government
2419 Formica's Way
Atlantic City, NJ 08401

RE: PETITION REVIEW

Dear Mr. McDevitt & Petitioners:

Please be advised that as City Clerk of the City of Atlantic City, I am required to review, for sufficiency, petitions which were submitted in support of a change of government under N.J.S.A. 40:79-1, et seq. the Municipal Manager Act of 1923 on December 11 and December 19, 2019. After a thorough and careful review of the submitted petitions by my office and legal counsel, it is my determination that the number of signatures required to satisfy the statutory requirement has not been met for the reasons set forth below:

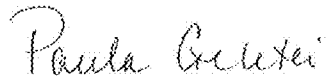
1. All petitions which were notarized by Jayesh K. Sodha were deemed to be invalid due to information received by the State of New Jersey, Department of Treasury that Mr. Sodha is not a notary in good standing properly registered in the State of New Jersey.
2. A number of petitions notarized by Rhashonna C. Cosby were improperly executed such that the circulators' names were either not provided or the attestation reflected the notary name and not that of the circulator. Those which were improperly attested were deemed invalid.
3. Individuals on petitions who were unregistered as voters or whose information was not legible were eliminated.

The number of valid signatures required to advance the petition is 935. Petitioners have submitted 699 valid signatures. Because the threshold number of signatures has not been met, the petition cannot advance.

EXHIBIT "D"

I certify that a proper inspection of the submitted Petitions has been performed and the results have been set forth above.

Sincerely,

A handwritten signature in cursive script that reads "Paula Geletei".

Paula Geletei, RMC, CMC

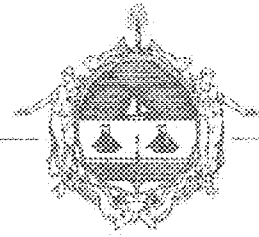
Clerk of the City of Atlantic City

c: Robert L. Tarver, Jr., Esq.
Michael Perugini, Esq., Solicitor

CITY OF ATLANTIC CITY

OFFICE OF THE CITY CLERK

City Hall - Room 704
1301 Bacharach Boulevard
Atlantic City, NJ 08401-4603
Office: (609) 347-5510
Fax: (609) 347-6408



PAULA GELETEI, RMC, CMC
City Clerk

January 16, 2020

Mr. C. Robert McDevitt
Atlantic City Residents for Good Government
2419 Formica's Way
Atlantic City, NJ 08401

Dear Mr. McDevitt:

On January 8, 2020, I advised the committee that the petition submitted under N.J.S.A. 40:79-1 was deficient for reasons identified in previous correspondence to your organization. One of the reasons for the disqualification of signatures was information received by the State of New Jersey, Department of Treasury that Mr. Jayesh K. Sodha is not a notary in good standing properly registered in the State of New Jersey.

Based upon additional information received, the State of New Jersey Department of Treasury has now updated their registry to reflect that Mr. Jayesh K. Sodha is properly registered with the State of New Jersey as a Notary Public.

By virtue of the corrective action by the State of New Jersey Department of Treasury, and pursuant to my duties as Municipal Clerk, please consider this correspondence as certification that the signatures submitted meets the required number of 935 signatures. Accordingly, as previously indicated the matter will be calendared for a public vote Tuesday, March 31, 2020. The County Board of Elections has been notified.

Sincerely,

A handwritten signature in cursive script that reads "Paula Geletei".

Paula Geletei, RMC, CMC
Clerk of the City of Atlantic City

c: Robert L. Tarver, Jr., Esq., Council Solicitor
Anthony Swan, Esq., City Solicitor

FORM R-1

REPORT OF CONTRIBUTIONS AND EXPENDITURES

REPORT FILED:

NEW JERSEY ELECTION LAW ENFORCEMENT COMMISSION

(2019-Q4) QUARTER 4 (JAN 15TH)

P.O. BOX 185, Trenton, NJ 08625-0185
(609) 292-8700 or Toll Free Within NJ 1-888-313-ELEC (3532)
Web site: http://www.elec.nj.gov

Filed On
1/15/2020 7:08:08 PM

Amendment

CANDIDATE OR COMMITTEE NAME

ATLANTIC CITY RESIDENTS FOR GOOD GOVERNMENT

STREET ADDRESS

1 CONVENTION BLVD. SUITE 2 #328

CITY STATE ZIP CODE
ATLANTIC CITY NJ 08401

COUNTY ELECTION DISTRICT OR MUNICIPALITY
ATLANTIC COUNTY ATLANTIC CITY

POLITICAL PARTY, IF ANY OFFICE SOUGHT

NONPARTISAN BALLOT QUESTION COMMITTEE

ELECTION DATE ELECTION TYPE
11/05/2019 GENERAL

RECEIPTS AND EXPENDITURES SUMMARY

Table with 3 columns: Description, Sign, Amount. Rows include: OPENING BALANCE * (\$30,046.63), RECEIPTS (+) (\$58,380.17), EXPENDITURES (-) (\$71,324.93), CLOSING BALANCE (\$17,101.87)

* Funds Transferred From Prior Campaign if First Report Filed

NET FINANCIAL SUMMARY

Table with 3 columns: Description, Sign, Amount. Rows include: CLOSING BALANCE (\$17,101.87), Debt Owed to Committee (+) (\$0.00), Debt Owed by Committee (-) (\$0.00), Total Net Worth (\$17,101.87)

EXHIBIT "F"

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
105	POLITANO, PAT 17 OAK LANE, CRANFORD NJ 07016		\$0.00	08/04/2019	\$2,000.00
Purpose	MEDIA - CONSULTING		Comments		
Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
109	CIFUENTES, PABLO 4 TELEMAR DR., VERNON NJ 07462		\$0.00	08/09/2019	\$800.00
Purpose	GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES		Comments		
Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
	TD BANK 15 NORTH PENNSYLVANIA AVENUE, ATLANTIC CITY NJ 08401		\$0.00	08/13/2019	\$20.00
Purpose	BANK CHARGES		Comments		
Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
111	CIFUENTES, PABLO 4 TELEMAR DR., VERNON NJ 07462		\$0.00	08/16/2019	\$800.00
Purpose	GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES		Comments		
Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
112	VASQUEZ, RYAN 108 N HARVARD AVENUE, APT B, VENTNOR NJ 08406		\$0.00	08/16/2019	\$2,800.00
Purpose	GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES		Comments		
Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
118	ALVES, PATRICK 78 FAIRBANKS ST, ELIZABETH NJ 07202		\$0.00	08/23/2019	\$200.00
Purpose	GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES		Comments		
Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
114	CIFUENTES, PABLO 4 TELEMAR DR., VERNON NJ 07462		\$0.00	08/23/2019	\$993.44
Purpose	GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES - AND REIMBURSEMENT FOR OFFICE SUPPLIES		Comments		
Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
117	FLORES, WILSON FRANCISCO 205 BELMONT AVENUE, JERSEY CITY NJ 07304		\$0.00	08/23/2019	\$400.00
Purpose	GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES		Comments		
Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
120	GARCIA, ANDREW 913 ELIZABETH AVENUE, 2ND FLOOR, ELIZABETH NJ 07201		\$0.00	08/23/2019	\$600.00

Purpose: GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
147	JAVIER, MARIA 175 BELMONT AVENUE, JERSEY CITY NJ 07304		\$0.00	10/25/2019	\$325.00

Purpose: GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
148	RED CLOUD STRATEGIES, LLC 29 TURNBERRY LANE, HAMBURG NJ 07419		\$0.00	10/26/2019	\$7,500.00

Purpose: CONSULTING - POLITICAL

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
151	SALINAS, REBECCA 1100 N SALEM AVENUE, HILLSIDE NJ 07205		\$0.00	10/30/2019	\$560.00

Purpose: GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
152	CIFUENTES, PABLO 4 TELEMARK DR., VERNON NJ 07462		\$0.00	11/02/2019	\$800.00

Purpose: GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
153	JAVIER, MARIA 175 BELMONT AVENUE, JERSEY CITY NJ 07304		\$0.00	11/02/2019	\$300.00

Purpose: GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
155	JAVIER, MARIA 175 BELMONT AVENUE, JERSEY CITY NJ 07304		\$0.00	11/07/2019	\$350.00

Purpose: GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
156	CIFUENTES, PABLO 4 TELEMARK DR., VERNON NJ 07462		\$0.00	11/08/2019	\$800.00

Purpose: GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
54127448-8	GROSE, ALFRED 10A CRESTMONT ST, SOMERS POINT NJ 08244		\$0.00	11/08/2019	\$252.00

Purpose: GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
54127449-0	REILLY, EDWARD 1464 W RIVERSIDE DRIVE FL 1, ATLANTIC CITY NJ 08401		\$0.00	11/08/2019	\$168.00

Purpose: GOTV-POLLWORKERS-ELECTION DAY ACTIVITIES

Check No.	Payee Name And Address	Date	Balance Amount	Date Disbursed	Amount Disbursed
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WAIVER AND RELEASE OF LIABILITY

In consideration of the risk of injury while participating in "Canvassing" (the "Activity"), and as consideration for the right to participate in the activity, I hereby, for myself, my heirs, executors, administrators, assigns, or personal representatives, knowingly and voluntarily enter into this waiver and release of liability and hereby waive any and all rights, claims or causes of action of any kind whatsoever arising out of my participation in the Activity, and do hereby release and forever discharge RED CLOUD STRATEGIES LLC, their affiliates, managers, members, agents, attorneys, staff, volunteers, heirs, representatives, predecessors, successors and assigns, for any physical or psychological injury, including but not limited to illness, paralysis, death, damages, economical or emotional loss, that I may suffer as a direct result of my participation in the aforementioned Workshop Series, including traveling to and from an event related to this Activity.

I AM VOLUNTARILY PARTICIPATING IN THE AFOREMENTIONED ACTIVITY AND I AM PARTICIPATING IN THE ACTIVITY ENTIRELY AT MY OWN RISK. I AM AWARE OF THE RISKS ASSOCIATED WITH TRAVELING TO AND FROM AS WELL AS PARTICIPATING IN THIS ACTIVITY, WHICH MAY INCLUDE, BUT ARE NOT LIMITED TO, PHYSICAL OR PSYCHOLOGICAL INJURY, PAIN, SUFFERING, ILLNESS, DISFIGUREMENT, TEMPORARY OR PERMANENT DISABILITY (INCLUDING PARALYSIS), ECONOMIC OR EMOTIONAL LOSS, AND DEATH. I UNDERSTAND THAT THESE INJURIES OR OUTCOMES MAY ARISE FROM MY OWN OR OTHERS' NEGLIGENCE, CONDITIONS RELATED TO TRAVEL, OR THE CONDITION OF THE ACTIVITY LOCATION(S). NONETHELESS, I ASSUME ALL RELATED RISKS, BOTH KNOWN OR UNKNOWN TO ME, OF MY PARTICIPATION IN THIS ACTIVITY, INCLUDING TRAVEL TO, FROM AND DURING THIS ACTIVITY.

I agree to indemnify and hold harmless against any and all claims, suits or actions of any kind whatsoever for liability, damages, compensation or otherwise brought by me or anyone on my behalf, including attorney's fees and any related costs, if litigation arises pursuant to any claims made by me or by anyone else acting on my behalf. If RED CLOUD STRATEGIES LLC incur any of these types of expenses, I agree to reimburse RED CLOUD STRATEGIES LLC. I acknowledge that RED CLOUD STRATEGIES LLC, and their directors, officers, volunteers, representatives and agents are not responsible for errors, omissions, acts or failures to act of any party or entity conducting a specific event or activity on behalf of RED CLOUD STRATEGIES LLC. I ACKNOWLEDGE THAT THIS ACTIVITY MAY INVOLVE A TEST OF A PERSON'S PHYSICAL AND MENTAL LIMITS AND MAY CARRY WITH IT THE POTENTIAL FOR DEATH, SERIOUS INJURY, AND PROPERTY LOSS. The risks may include, but are not limited to, those caused by terrain, facilities, temperature, weather, lack of hydration, condition of participants, equipment, vehicular traffic and actions of others, including but not limited to, participants, volunteers, spectators, coaches, event officials and event monitors, and/or producers of the event.

QUALITY CONTROL STANDARDS

I acknowledge and willingly accept the following daily shift requirements which must be met to be eligible for payment for each canvassing shift: All canvassers must return 3 verified signatures per shift. Release of check is dependent on the successful notarization of petitions. I accept that all petition affidavits for my petitions must be notarized at the time of payment for the activity.

I understand and accept that the event of proven fraud on my petition, or, the petitions of others as a result of my actions, will result in the immediate forfeiture of any and all payment due to me for the activity.

NONDISCLOSURE AGREEMENT

THIS AGREEMENT is entered into by and between RED CLOUD STRATEGIES and _____, (hereinafter referred to as "Canvasser"). RED CLOUD STRATEGIES and Canvasser, by and on the date of their respective authorized signatures below, hereby agree as follows:

1. RED CLOUD STRATEGIES has agreed to data and voting records of a confidential and proprietary nature to the Canvasser solely for the purpose of utilizing internally and within the given tasks of the Canvassers employment with RED CLOUD STRATEGIES. It is agreed that the information and data transferred by RED

CLOUD STRATEGIES to the Canvasser shall be considered "Confidential Information" and subject to the provisions of this Agreement.

2. The Canvasser agrees that it shall keep in confidence and not disclose to any other person, firm, business or entity any of the Confidential Information provided by RED CLOUD STRATEGIES and its partners, clients, employees and associates.

3. All Confidential Information is furnished upon the condition that it shall remain the property of RED CLOUD STRATEGIES and shall be returned to RED CLOUD STRATEGIES promptly at its request, or in the event Canvasser discontinues its relationship with RED CLOUD STRATEGIES.

4. This is the entire Agreement between the parties concerning Confidential Information and it supersedes any prior written or oral agreements thereon and may not be amended or modified except by subsequent agreement in writing signed by the parties hereto.

5. This Agreement shall be governed by the laws of the State of New Jersey.

6. Nothing in this Agreement shall grant to either party the right to make commitments of any kind, for or on behalf of the other party. This Agreement is not intended to be, nor shall it be construed, so as to create or imply the existence of a joint venture, partnership, or other business organization.

7. Neither party shall assign or sublicense its rights or obligations under this Agreement.

8. This Agreement shall be effective upon the date of acceptance and agreement by both parties ("Effective Date"), and except for the obligations of Paragraphs 1 and 2 above, which shall remain effective perpetually with respect to any Confidential Information transmitted under this Agreement, shall (unless extended by mutual agreement in writing) terminate upon thirty (30) days, written notice by one party to the other. Upon any such termination, all Confidential Information shall immediately be returned to RED CLOUD STRATEGIES.

9. The undersigned represent and warrant that they have the authority to execute this Agreement on behalf of themselves and their respective parties.

I ACKNOWLEDGE THAT I HAVE CAREFULLY READ THIS "WAIVER AND RELEASE" AND FULLY UNDERSTAND THAT IT IS A RELEASE OF LIABILITY. I EXPRESSLY AGREE TO RELEASE AND DISCHARGE AND ALL OF ITS AFFILIATES, MANAGERS, MEMBERS, AGENTS, ATTORNEYS, STAFF, VOLUNTEERS, HEIRS, REPRESENTATIVES, PREDECESSORS, SUCCESSORS AND ASSIGNS, FROM ANY AND ALL CLAIMS OR CAUSES OF ACTION AND I AGREE TO VOLUNTARILY GIVE UP OR WAIVE ANY RIGHT THAT I OTHERWISE HAVE TO BRING A LEGAL ACTION AGAINST FOR PERSONAL INJURY OR PROPERTY DAMAGE.

To the extent that statute or case law does not prohibit releases for negligence, this release is also for negligence on the part of RED CLOUD STRATEGIES LLC, its agents, and employees. In the event that I should require medical care or treatment, I agree to be financially responsible for any costs incurred as a result of such treatment. I am aware and understand that I should carry my own health insurance. In the event that any damage to equipment or facilities occurs as a result of my willful actions, neglect or recklessness, I acknowledge and agree to be held liable for any and all costs associated with any actions of neglect or recklessness.

Full Name (please, print): _____

Date: _____

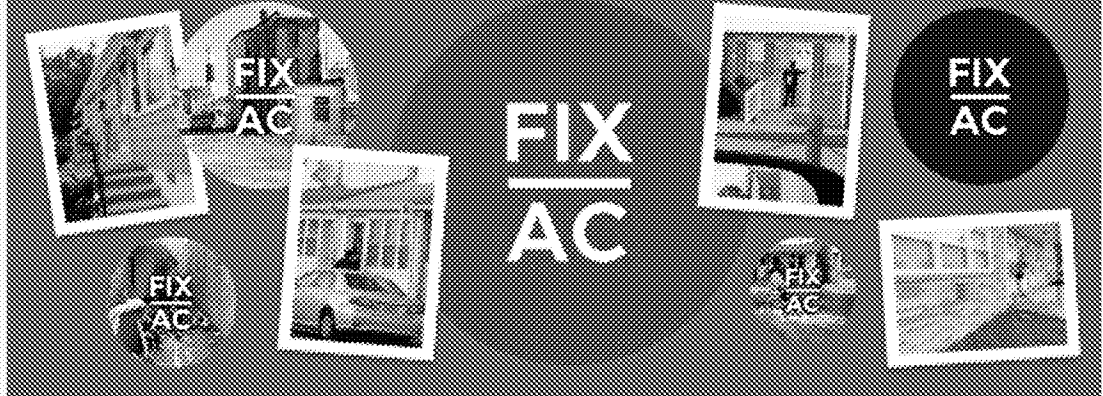
Signature: _____



Atlantic City Residents for Good Government

@whatwecanfixac

- Home
- Posts
- Reviews
- Photos
- About
- Community



Like Share Suggest Edits Learn More Send Message

3.4

3.4 out of 5

Based on the opinion of 5 people



Ratings and reviews have changed

Now it's easier to find great businesses with recommendations

Learn More

Recommended by 5 people

MOST HELPFUL MOST RECENT



Duck'em Quay doesn't recommend Atlantic City Residents for Good Government.

December 2, 2019



Ben Albert recommends Atlantic City Residents for Good Government.

August 27, 2019

Atlantic City Deserves better! Residents are standing up to demand a form of government that's accountable to the people not the political class and their select few cronies.

See more of Atlantic City Residents for Good Government on Facebook

Log In

Create New Account



...in fact they are based on a quota and how many signatures you get its a scam and I worked 21hours and now I feel I'm being cheated out of my time and effort.

10w



Kathryn Elsayed recommends Atlantic City Residents for Good Government.

July 19, 2019

The citizens of Atlantic City have the right to decide their own government. By signing this petition you're making it possible for people to choose which form of government they want, a special election will be held called a referendum. Your signature will help make this referendum possible, so please sign.



2 Comments 2 Shares



Jerome Gates False advertising they said the don't have quotas or are they're not based on how many signatures you get they said in the message that they pay by the hour but when you get the job they will have sign a contract saying its in fact they are based off a quota and how many signatures you get its a scam and I worked 21hours and now I feel I'm being cheated out of my time and effort.

10w

Major Edward Drinks replied · 1 Reply



Iris June Weingarten recommends Atlantic City Residents for Good Government.

November 22, 2019

Anything is better than what we have now

#LeadersYouCanCountOn

Roselle Democratic Committee

VOLUNTEER



#LeadersYouCanCountOn

Roselle Democratic Committee

Andrew: (908)-425-2621
Ryan: (908)-613-2210
Tyrone (security): (908)-525-5858



Linden Democratic Committee

VOLUNTEER



Linden Democratic Committee

Andrew: (908)-425-2621
Ryan: (908)-613-2210
Tyrone (security): (908)-525-5858

Samuel D. Lashman, Esq. (ID No. 024801988)
119 N. Hanover Ave.
Margate, N.J. 08402
(609) 344-7755
Attorney for Plaintiff AC Democratic Committee

Atlantic City Democratic Committee,	:	SUPERIOR COURT OF NEW JERSEY
Plaintiff,	:	ATLANTIC COUNTY
vs.	:	LAW DIVISION
	:	
Atlantic City Residents for Good	:	CIVIL ACTION
Government, Inc., Unnamed Petition	:	
Committees 1-2, being fictitious names,	:	DOCKET NO.
Clerk of City of Atlantic City in her official	:	
capacity, and John Does 1-25, individuals	:	ORDER TO SHOW CAUSE
who were circulators or others being	:	WITH RESTRAINT
fictitious names.	:	
Defendants.	:	

This matter having been opened to the Court by Samuel Lashman, Esq., attorney for Plaintiff, Atlantic City Democratic Committee by filing the Verified Complaint without prior notice to Defendants; and

The Court finding that an expedited schedule for hearing this matter is required in the circumstances; that there is a probability of success on the merits by Plaintiff, that there exists a probability of immediate and irreparable harm as to Plaintiff; that no party will seriously be injured by the entry of any temporary injunction; that considering the equities, the same

preponderate in favor of Plaintiff; and the Court having considered the papers, and having heard argument of counsel, and for good cause having been shown;

IT IS on this ____ day of February 2020 ORDERED that Defendants, and each of them who can be identified and served, show cause before the Superior Court of New Jersey, Atlantic County, Law Division at the Atlantic County Civil Courthouse, located at: 1201 Bacharach Blvd., Atlantic City, N.J., on the _____ day of _____ 2020 at ____ M., why an Order should not be entered in favor of Plaintiff, preliminarily enjoining Defendant, until a final disposition of this matter or further order of Court.

AND, IT IS FURTHER ORDERED THAT:

1. The election scheduled for March 31, 2020 is hereby stayed until the preliminary hearing is held on this matter;

2. All other time periods regarding the rights of either party for a remedy are tolled as of filing of this Complaint pending a hearing or further order of the Court;

3. Any party to move by telephone conference before this Court for the dissolution or modification of any restraints, complained of in this ORDER TO SHOW CAUSE, upon two (2) days notice to all other parties;

4. A copy of this ORDER TO SHOW CAUSE, Verified Complaint, supporting Certifications and Brief be served on Defendant Atlantic City Clerk and Atlantic City Residents for Good Government, Inc. within 1 business day of the date hereof, said service to be made by hand delivery if possible, and providing that a copy of any executed Order may also be served by fax to any party once entered in accordance with R. 4:4-3 and R. 4:4-4, this being original process; and

5. Defendants shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by _____, 20___. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. You must send a copy of your opposition papers directly to Judge _____, whose address is 1201 Bacharach Blvd., Atlantic City, N.J. 08401. You must also send a copy of your opposition papers to the plaintiff's attorney whose name and address appears above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and pay the required fee of \$175.00 and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking.

6. The plaintiff must file and serve any written reply to the defendant's order to show cause opposition by _____, 20___. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge _____.

7. If the defendant does not file and serve opposition to this order to show cause, the application may be decided on the papers on the return date and relief may be granted by default, provided that the plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.

8. If the plaintiff has not already done so, an additional proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with

return address and postage) must be submitted to the court no later than three (3) days before the return date.

9. Defendants take notice that the plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service by _____, 2020 or within _____ days from the date of service of this order to show cause; not counting the day you received it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. Include a \$175.00 filing fee payable to the “Treasurer State of New Jersey” unless you have paid the proper fee before filing the Answer. You must also send a copy of your Answer to the plaintiff’s attorney whose name and address appear above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: if you do not timely file and serve an Answer within the time set forth in this Order, the Court may enter a default against you for the relief plaintiff demands.

If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance you

may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

10. The court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than ___ days before the return date.

Opposed
 Unopposed

PAPERS CONSIDERED:

Orders to Show Cause
 Movant's Affidavits
 Movant's Brief
 Answering Affidavits
 Answering Brief
 Cross-Motion
 Movant's Reply
 Other

Samuel D. Lashman, Esq. (ID No. 024801988)
119 N. Hanover Ave.
Margate, N.J. 08402
(609) 344-7755
Attorney for Plaintiff A.C. Democratic Committee

Atlantic City Democratic Committee,	:	SUPERIOR COURT OF NEW JERSEY
Plaintiff,	:	ATLANTIC COUNTY
vs.	:	LAW DIVISION
	:	
Atlantic City Residents for Good	:	CIVIL ACTION
Government, Inc., Unnamed Petition	:	
Committees 1-2, being fictitious names,	:	DOCKET NO.
Clerk of City of Atlantic City in her official	:	
capacity, and John Does 1-25, individuals	:	PRELIMINARY ORDER
who were circulators or others being	:	WITH RESTRAINTS
fictitious names.	:	
Defendants.	:	

This matter having been opened to the Court by Samuel Lashman, Esq., attorney for Plaintiff, Atlantic City Democratic Committee, Plaintiff, by filing the Verified Complaint and the matter having come before the Court on hearing for entry of a Preliminary Order, and with appearances of Samuel Lashman, Esq. for Plaintiff, and counsel for Defendant Atlantic City Clerk and counsel for Defenant Atlantic City Residents for Good Government, Inc.; and

The Court finding that an expedited schedule for hearing this matter is required in the circumstances; that the factors for granting restraints and other relief have been shown

preliminarily; that no party will seriously be injured by the entry of any temporary injunction; and the Court having considered the papers, and having heard argument of counsel, and for other good cause having been shown;

IT IS on this _____ day of February 2020 ORDERED that Plaintiff and Defendants shall show cause before the Superior Court of New Jersey, Atlantic County, Law Division at the Courthouse, located at: 1201 Bacharach Blvd., Atlantic City, N.J. 08401, on the ____ day of February, 2012 at 10 A.M., why a Permanent Injunction or other Order should not be entered in favor of Plaintiff in this matter; and it is further ORDERED that:

1. The Petition and Special Election called for March 31, 2020 are hereby STAYED pending further order of the court, no ballots shall be printed in the interim until further Order and no other actions taken for the election.

2. All timeperiods for filing are tolled as of the filing of the Verified Complaint.

3. Defendants shall file their Answers on or before _____.

4. All books, papers, documents and forms relating to the Petition in possession or control of Defendants, the City of Atlantic City and its Clerk, ACRGG, JPCs 1-2, John Does 1-25 or other entities with possession of the same be maintained and produced for discovery, including documents of Red Cloud Strategies and any provisions under its “Nondisclosure Agreement” are null and void with respect to production of discovery with the exception that material containing confidential information of voters shall be maintained confidentially by counsel for the parties.

5. Written discovery shall be propounded within ____ days and responses due on _____, 2020;

6. Depositions if desired shall commence on _____ and be completed by _____, 2020.

7. Dispositive Motions shall be filed by _____, 2020.

8. If not resolved the matter shall be tried starting on _____, 2020.

9. Any party to move by telephone conference before this Court for the dissolution or modification of any restraints, complained of in this Preliminary Order, upon two (2) days notice to all other parties.

10. A copy of this order shall be served on any party not appearing with counsel within 7 days of entry by regular mail and otherwise electronically through eCourts on counsel.

____ Opposed
____ Unopposed

PAPERS CONSIDERED:

____ Orders to Show Cause
____ Movant's Affidavits
____ Movant's Brief
____ Answering Affidavits
____ Answering Brief
____ Cross-Motion
____ Movant's Reply
____ Other

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(609) 344-7755 * lashmans@yahoo.com

February 10, 2020

Hon. Julio L. Mendez, A.J.S.C.
Superior Court of New Jersey
Atlantic County Civil Courthouse
1201 Bacharach Blvd.
Atlantic City, NJ 08401

Re: Atlantic City Democratic Committee v. Atlantic City Residents for Good Government, Inc., Unnamed Petition Committees 1-2 being fictitious names, Clerk of City of Atlantic City in her official capacity, and John Does 1-25, individuals who were circulators or others being fictitious, Docket No. ATL- tba -20 PW

Dear Judge Mendez:

Please accept this letter in lieu of a more formal brief in the above matter on behalf of the Plaintiff Atlantic City Democratic Committee. This matter is being brought as an Order to Show Cause on a Prerogative Writ to restrain the election for a change of government initiated by Petition submitted to the Atlantic City Clerk on or about December 11, 2019.

Plaintiff argues that the Petition is defective, was fraudulently obtained and is unconstitutional among other things and requests entry of a restraining order staying the election until the matter can be heard.

Statement of Facts and Procedural History

The City of Atlantic City operates under a Faulkner Act Mayor Council form of government pursuant to N.J.S.A. 40:69A-1 et seq. This form of government includes a Mayor and 3 council members elected at large and 6 council members elected from each of the City's 6 wards.

The City of Atlantic City is also now subject to the Municipal Recovery and Stabilization Act, N.J.S.A. 52:27BBBB-1 et seq. and was at all relevant times.

On or about December 11, 2019 a Petition pursuant to N.J.S.A. 40:79-1 was filed to change the form of government to a Council Manager type of government with 5 at large council members who would select a mayor from among themselves after election and hire a City

Manager to run the City.. The signatures appear to have been gathered from July to December 2019 and some may have been turned in after December 11th 2019.

On January 9, 2020 the City Clerk rejected the Petition as deficient with 699 signatures allowed out of over 3000 submitted.

On January 16, 2020 the Clerk then accepted the Petition.

According to one receipt the sponsor of the Petition was Atlantic City Residents for Good Government (without "Inc."), hereafter ACRGG. However to be clear the petition pages do not list any sponsor or committee. Further there are two types of petition pages, Type A with 5 signatures and a certification and Type B with multiple pages, the question on the first page and certification on the last page which allows for up to 50 signatures. Because there are two different forms, no committee names or sponsors on the petition it is actually unknown which entity is the sponsor.

Nevertheless, ACRGG is registered with NJ Election Law Enforcement Commission (ELEC) and filed quarterly reports indicating payments to various individuals and companies which worked on the petitions and gathered signatures as circulators or in other capacities.

Plaintiff ACDC alleges the Petition is invalid because it is legally defective, failed to have proper notarizations, failed to identify the sponsor/committee, failed to submit uniform petitions, has numerous crossouts and deletions and for many other problems identified in the Complaint.

Plaintiff ACDC also alleges the Petition was obtained by fraud in that the circulators actually did not obtain the signatures on the petitions, there are forgeries or false names included, the circulators misrepresented the contents or their connection to the sponsor, they paid circulators for each signature they obtained instead of by the hour or for their work irrespective of success in obtaining signature and other reasons.

Plaintiff finally objects to the at large election which would negatively affect representation of minority groups in Atlantic City as a violation the U.S. Constitution.

In regard to the facts and the complaint, Plaintiff has not been able to fully investigate the Petition because it has not had access to the records in the City of Atlantic City Clerk's Office and does not know the basis for the approval of an additional 236 signatures between January 9th and 16th. However ACDC has been able to obtain information about many of the circulators, their methods of collecting signatures and the signatures themselves and submits that the Petition does not contain validly collected signatures and should be thrown out and the election cancelled.

Legal Argument

Point 1. The Petition is defective.

Unlike regular elections, there is no standard law covering petitions in New Jersey. The Council Manager plan, N.J.S.A. is not even clear about the wording of the question which is set out indirectly in N.J.S.A. 40:80-3 for the clerk to place on the ballot:

“Shall subtitle 5 of the title Municipalities and Counties of the Revised Statutes (§ 40:79-1 et seq.), providing for municipal manager form of government, be adopted in (here insert name of municipality)?”

N.J.S.A. 30:80-1 states:

The legal voters of any municipality may adopt this subtitle at a special election to be held in such municipality, to be called by the municipal clerk upon request or petition in writing of the legal voters of the municipality not less in number than fifteen per centum (15%) of the number of persons who voted at the last preceding general election held for the purpose of electing all of the members of the general assembly as shown by the official canvass.

Basically the Council Manager form was established around 1923 and still calls for paper ballots, N.J.S.A. 40:80-3 “The municipal clerk shall provide double the number of ballots as there were voters registered for the last preceding general election in such municipality, to be printed upon plain, substantial white paper.”

In comparison the Faulkner Act, the form of government Atlantic City currently operates under is mostly self contained and provides initiative and referendum for almost any issue, N.J.S.A. 40:69A-185 et seq. This includes the need for a committee and verification of the circulators. However it is admitted that the committee need not be named in all circumstances such as in the event of reversion. Nevertheless the circulator portion is mandatory.

Because the format is silent in the Council Manager form we urge the Court to impose the requirement of the Committee for this petition.

In addition it is clear the petitions are not uniform in style either required under N.J.S.A. 40:69A-186. That might not matter if there was a committee of sponsors identified but in this case because there are two types of petitions we do not know how they were submitted or if more than one committee submitted two different sets. The situation here focuses on the lack of detail in the statute concerning the format of the petition being further taken advantage of by the unnamed sponsors.

While the Walsh Act, N.J.S.A. 40:74-10 also allows initiative and referenda on a local basis the Council Manager form does not and the citizens of Atlantic City would be losing a valuable right if the Council Manager plan is adopted. Therefore it is mostly silent about the

format of the petitions. Both the Faulkner and Walsh Acts permit corrective amendments but again the Council Manager form is silent on that. While it was determined that a reversion to prior form of government from the Faulkner Act does not require a committee to be named, Pappas v. Malone, 36 N.J. 1 (1961), the situation here is different in that Atlantic City would be leaving the Faulkner Act and furthermore the prior form of government was a Walsh Act Commission form.

Clearly the Council Manager form is outmoded to the present day and has not taken into account standard forms of petitions and therefore this petition should be rejected on that basis alone. As a note, Title 19 is silent on the form of petitions except to state that it applies to public questions, N.J.S.A. 19:1-4. N.J.S.A. 1:5-3 is not much help either because it only provides that the signature areas on petitions need to be double spaced.

However there are other reasons for rejection including the fact that Atlantic City is operating under the Municipal Recovery and Stabilization Act N.J.S.A. 52:27BBBB-1, and any question is advisory only. Title 19 does cover that eventuality in providing that nonbinding referenda should be submitted to the public at the general election, N.J.S.A. 19:37-1.

The petitions have many other numerous deficiencies as indicated by the City Clerk's original rejection letter, Exhibit D to Complaint, including a number of petitions notarized by one notary were improperly executed in that she stated she was circulator and then notarized her own petition if correct. Further, reason 3, individuals on petitions were unregistered and illegible. See also Certification for redacted petitions containing examples of the Rhashonna Cosby issues not filed on eCourts.

Upon information and belief several minors circulated petitions which is grounds for rejecting those signatures. Minors are not of full age nor voters and cannot affirm to the necessary circulator's oaths and affidavits.

See also Certification of Samuel Lashman for redacted petitions containing additional examples of problems found by investigation not being filed on eCourts.

In light of the above reasons Plaintiff urges the Court to reject the Petition or at least stay the election pending a hearing on the evidence produced and allow Plaintiff discovery on the reasons for the Clerk's rejections along with granting the Plaintiff access to the petition materials.

Point 2. The Petition signatures were obtained fraudulently.

Many of the same points above concerning physical deficiencies relate to fraud. The facts that minors were circulators, that the notary improperly certified she was the circulator and similar facts given.

In addition the reasons that the committee was not named in this case is another grounds of fraud. Specifically, the Petition is rife with bad signatures.

The Circulators were often not the persons signing the affidavits;

One supposed signatory was in Florida not Atlantic City;

The Circulators were paid on a per signature basis;

We have been advised that additional pages were submitted after December 11, 2019 improperly;

Red Cloud Strategies, LLC included a “Nondisclosure Agreement” as part of its management of the circulators. Paying workers to obtain mail in ballots or registrations per person is usually not allowed and neither should paying circulators to obtain signatures per signature be allowed. See Complaint exhibits “F,” “G,” and “H.” The circulators also wore badges identifying them not from ACRGG but from Roselle or Linden Democratic Committees, see Exhibit I to Complaint. Again neither of those entities was listed as a in-kind vendor or contributor on the ELEC reports.

N.J.S.A. 19:44A-8 Contributions, expenditures, reports, requirements.

a. (1) Each political committee shall make a full cumulative report, upon a form prescribed by the Election Law Enforcement Commission, of all contributions in the form of moneys, loans, paid personal services, or other things of value made to it and all expenditures made, incurred, or authorized by it in furtherance of the nomination, election, or defeat of any candidate, or in aid of the passage or defeat of any public question,

Intentional failure to report work by the Roselle or Linden Committees, constitutes a violation of campaign finance law in a regular election sufficient to invalidate the entire petition not just one or two pages of signatures, see N.J.S.A. 19:29-1 et seq.

The numerous other situations discovered here are more than sufficient grounds to cause rejection of the Petition and under the current circumstances a stay is the only logical course of action.

Point 3. At large districts have been held to be discriminatory.

Again the form of government proposed is almost an antique. It calls for at-large voting in the entire City of Atlantic City which now has 6 district council members and 3 at-large members giving almost every group representation.

The New Jersey Law Against Discrimination, N.J.S.A. 10:6-1 et seq. preserves individuals rights to representation and vote. See *Tumpson v. Farina*, 218 N.J. 450, 473-480 (2014) addressing the New Jersey Civil Rights Act in context of a citizen’s referendum in Hoboken.

At-large district voting schemes have been routinely disallowed under the Voting Rights Act 52 U.S.C. 10101 (formerly 42 U.S.C. 1973) because they disenfranchise numerous groups,

see e.g. *Maldef v. City of Pasadena* (Texas); *Reynolds v. Sims*, 377 U.S. 533 (1964) re voting dilution; *United States v. Euclid City School District Board of Education* (N.D. Ohio 2008); *United States v. The School Board of Osceola County* (M.D. Fla. 2008); *United States v. Village of Port Chester* (S.D.N.Y. 2006) [full citations unavailable at this time].

The scheme here is even more suspect in that it was promulgated by private interests. The present City council contains 1 Hispanic Member, 2 South Asians, 2 Caucasians and 4 African Americans. As of the 2010 United States Census, the racial makeup of the city was about 27% White; 38% Black or African American; 16% Asian; 14% from other races, and 5% from two or more races. Hispanic or Latino of any race were 30%.

Based on the at large plan it is unlikely that several council members would be viable, see certifications attached.

Point 4. Plaintiff is entitled to entry of a preliminary injunction.

The standards for granting a preliminary injunction were set forth in *Crowe v. DeGoia*, 90 N.J. 126, 132-133 (1982). The requirements are (1) showing of irreparable harm; (2) showing that legal right is not unsettled; (3) showing that material facts are not controverted; and (4) testing the relative hardship of the parties, *id.*

Allowing this Petition to go forward at this time is simply wrong. Even a few month delay would allow proper discovery for a hearing. An analogy is the situation of Mail in votes. Challengers are not permitted to inspect the materials until after the Board of Elections counts and processes them.

The facts shown on the few exhibits and this brief demonstrate the rights of the citizens are about to be violated by conducting an election in these circumstances. Moreover an extension would actually allow both sides more time to campaign while the State of New Jersey does not even have to accept the result making an election a possible exercise in futility.

The purpose of a preliminary injunction is to maintain the parties in substantially the same condition when it is entered as they were when the litigation began, *Crowe* at 134, therefore an injunction should be entered now.

Conclusion.

For the reasons given, a temporary injunction should immediately be entered and the matter set down for an expedited hearing and management conference.

Respectfully,

/s/ Samuel Lashman

Samuel Lashman, Esq

Samuel D. Lashman, Esq. (ID No. 024801988)
119 N. Hanover Ave.
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(609) 344-7755
Attorney for Plaintiff A.C. Democratic Committee

Atlantic City Democratic Committee,	:	SUPERIOR COURT OF NEW JERSEY
Plaintiff,	:	ATLANTIC COUNTY
	:	LAW DIVISION
vs.	:	
	:	CIVIL ACTION
Atlantic City Residents for Good	:	
Government, Inc., Unnamed Petition	:	DOCKET NO.
Committees 1-2, being fictitious names,	:	
Clerk of City of Atlantic City in her official	:	CERTIFICATION OF
capacity, and John Does 1-25, individuals	:	MUHAMMAD ANJUM ZIA
who were circulators or others being	:	
fictitious names.	:	
Defendants.	:	

CERTIFICATION OF MUHAMMAD ANJUM ZIA

1. I, Muhammad Anjum Zia, of full age certify as follows:
2. I am the recently elected Atlantic City 5th Ward Council Member.
3. I have read the Third Count of the Complaint and I believe that an at-large district, abolishing wards in Atlantic City, would be detrimental to the City of Atlantic City and so I am against the Change of Government Petition.
4. Many of the residents of the 5th Ward have a language barrier which makes it difficult for them to participate in political activities.
5. I am of South Asian descent and in an at-large my chances of gaining support and representation are very low because there is also a high percentage of polarized voting.

6. The Council Manager plan and an at-large district would be divisive and discriminatory.

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

Dated: 2 - 10 - 2020



MUHAMMAD ANJUM ZIA

Samuel D. Lashman, Esq. (ID No. 024801988)
119 N. Hanover Ave.
Margate, N.J. 08402
(609) 344-7755
Attorney for Plaintiff A.C. Democratic Committee

Atlantic City Democratic Committee,	:	SUPERIOR COURT OF NEW JERSEY
Plaintiff,	:	ATLANTIC COUNTY
	:	LAW DIVISION
vs.	:	
	:	CIVIL ACTION
Atlantic City Residents for Good	:	
Government, Inc., Unnamed Petition	:	DOCKET NO.
Committees 1-2, being fictitious names,	:	
Clerk of City of Atlantic City in her official	:	CERTIFICATION OF
capacity, and John Does 1-25, individuals	:	MD. HOSSAIN MORSHED
who were circulators or others being	:	
fictitious names.	:	
Defendants.	:	

CERTIFICATION OF MD. HOSSAIN MORSHED

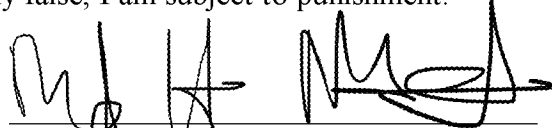
1. I, Md. Hossain Morshed, of full age certify as follows:
2. I am the recently elected Atlantic City 4th Ward Council Member.
3. I have read the Third Count of the Complaint and I believe that an at-large district, abolishing wards in Atlantic City, would be detrimental to the City of Atlantic City and so I am against the Change of Government Petition.
4. Many of the residents of the 4th Ward have a language barrier which makes it difficult for them to participate in political activities.
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I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

2/10/20


MD. HOSSAIN MORSHED

Civil Case Information Statement

Case Details: ATLANTIC | Civil Part Docket# L-000496-20

Case Caption: ATLANTIC CITY DEMOCRATIC COMM VS ATLANTIC CITY

Case Initiation Date: 02/11/2020

Attorney Name: SAMUEL D LASHMAN

Firm Name: SAMUEL D. LASHMAN

Address: 119 N HANOVER AVENUE

MARGATE CITY NJ 08402

Phone: 6093447755

Name of Party: PLAINTIFF : Atlantic City Democratic Comm.

Name of Defendant's Primary Insurance Company

(if known): None

Case Type: ACTIONS IN LIEU OF PREROGATIVE WRITS

Document Type: Verified Complaint

Jury Demand: NONE

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? YES

Are sexual abuse claims alleged? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Names of Defendant entities are unknown some are fictitious names. Will be contacting Judge's chambers for time to deliver papers after e-filing. Any difficulties uploading documents will hand deliver and some contain confidential information re voting records to be filed by hand or confidentially. Civil Rights claim may be a Federal matter if not heard in Superior Court and may provide for attorneys fees as may fraud claim.

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

02/11/2020

Dated

/s/ SAMUEL D LASHMAN

Signed