

Stephen J. Edelstein, Esq. – 285031972  
Schwartz ■ Edelstein Law Group LLC  
100 South Jefferson Road, Suite 200  
Whippany, New Jersey 07981  
(973) 301-0001  
Attorneys for Plaintiffs

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DR. FELIX ROQUE and DEMOCRATS  
FOR HUDSON COUNTY

Plaintiffs

vs.

HUDSON COUNTY DEMOCRATIC  
ORGANIZATION, JONATHAN  
CASTANEDA, CARMELA RICCIE,  
West New York Municipal Clerk, and E.  
JUNIOR MALDONADO, Hudson  
County Clerk

Defendants

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

CIVIL ACTION

**VERIFIED COMPLAINT**

**PARTIES**

1. Democrats for Hudson County (“Plaintiff”) are comprised of the candidates running for the West New York Democratic Municipal Committee using the slogan Democrats for Hudson County.

2. Dr. Felix Roque is the Mayor of West New York, a registered voter of West New York, and the leader of Democrats for Hudson County.

3. The Hudson County Democratic Organization (“HCDO”) is a party committee which has authorized certain candidates running for the West New York Democratic Municipal Committee to use its slogan.

4. Jonathan Castaneda is an individual who, by way of misconduct, fraudulently induced certain West New York registered voters to sign Democratic Municipal Committee petitions in which the candidate name was blank, later filling in the names of HCDO candidates whom those signers did not support.

5. Carmela Riccie is the West New York Municipal Clerk

6. E. Junior Maldonado is the Hudson County Clerk.

#### **JURISDICTION AND VENUE**

7. Jurisdiction is conferred upon this Court by R. 4:69-1 and the Court's inherent jurisdiction to consider and review election matters, as well as N.J.S.A. 19:13-1, *et seq.* Venue is proper in Hudson County pursuant to R. 4:3-2, as the election in question and the subsequent actions complain of herein occurred in Hudson County.

#### **THE NATURE OF THE ACTION AND THE UNDERLYING FACTS**

8. The Plaintiffs brings this action to invalidate the nominating Petitions for the office of West New York Democratic Municipal Committee filed by the HCDO on April 2, 2018.

9. In the municipality of West New York, there two slates of Democratic Municipal Committee candidates competing for election in 29 election districts in the June 2018 General Election.

10. On April 2, 2018, candidates running for the West New York Democratic Municipal Committee under the slogan "Hudson County Democratic Organization" filed nominating petitions ("Petitions" or "Petition") with the Clerk of West New York for the June 2018 primary election.

11. The Petitions were accepted by the clerk for filing because the Petitions, on their face, appeared valid and in conformity with the law.

12. In actuality, the Petitions did not conform with the applicable law, since they were circulated and signed without the candidates' names appearing, as required by N.J.S.A. 19:3-4. N.J.S.A. 19:3-4 states that "[s]uch petition shall set forth the names, places of residence and post-office addresses of the candidates for the office to be filled . . . ."

13. The candidate names were placed on the petitions after the signatures were obtained.

14. This unlawful scheme was carried out by Jonathan Castaneda, who circulated the petitions without candidate names, misled the signatories into believing that the petitions were for one or more different offices apart from Democratic Municipal Committee, and failed to inform signatories of the true contents of the Petitions.

15. The election districts in which this unlawful conduct occurred include but are not limited to District 1-1, 1-3, 1-5, 1-8, 2-5, 2-6, 2-8, 3-1, 3-4, 3-8, 3-10, and 3-11. The testimony of Jonathan Castaneda is necessary to learn the full extent of this fraud, but it has not yet been obtained. See, infra.

16. Pursuant to N.J.S.A. 19:13-10, an objection may be filed to a petition for nomination no later than four (4) days after the filing deadline.

17. On April 6, 2018, in accordance with N.J.S.A. 19:13-10, the Plaintiff Democrats for Hudson County filed an objection to the nominating petitions.

18. On April 11, 2018, a hearing on the objection was conducted by the West New York Municipal Clerk.

19. Jonathan Castaneda was served a subpoena by the Clerk to appear at said hearing. See Edelstein Cert., Exhibit A.

20. Mr. Castaneda has intimate knowledge pertaining to the matter.

21. Mr. Castaneda failed to appear for said hearing, despite being under subpoena.

22. Mr. Castaneda sent an e-mail to the West New York Town Clerk, Carmela Riccio, on the morning of the hearing advising of his refusal to appear. See Edelstein Cert., **Exhibit B**.

**COUNT ONE**

23. The allegations contained in Paragraphs 1 through 22 are incorporated by reference as if fully set forth herein.

24. Defendants have unlawfully and fraudulently obtained signatures on the challenged petitions in support of nominating candidates for the Hudson County Democratic Organization.

23. The Petitions should be invalidated based on their fraudulent obtainment and Mr. Castaneda must be required to answer for his misconduct.

25. The candidates named in the petitions should be prohibited from running in the June 2018 election due to the aforesaid unlawful and fraudulent actions.

26. The plaintiffs have no adequate remedy but to invalidate the Petitions.


**WHEREFORE**, Plaintiffs respectfully request the Court enter judgment as follows:

- (1) Invalidating the challenged Petitions for nomination filed by Defendants;
- (2) Prohibiting the candidates for West New York Democratic Municipal Committee running with the slogan Hudson County Democratic Organization from appearing on the June primary ballot.
- (3) Awarding Plaintiff reasonable attorney's fees and costs;

(4) Awarding Plaintiff such other and further relief as the Court deems just and proper under the circumstances.

Schwartz ■ Edelstein Law Group LLC  
Attorneys for Plaintiffs

By: \_\_\_\_\_

  
STEPHEN J. EDELSTEIN

Date: April 16, 2018

**DESIGNATION OF COUNSEL**

In accordance with R. 4:5-1, Stephen J. Edelstein, Esq. is hereby designated as trial counsel for Plaintiff, Democrats for Hudson County.

**CERTIFICATION PURSUANT TO RULE 4:5-1**

Pursuant to R. 4:5-1, I certify that the matter in controversy is not the subject of any other action pending in any court and is not the subject of any pending arbitration proceeding. I further certify that I have no knowledge of any other contemplated action or arbitration proceeding regarding the subject matter of this action and I am not aware of any other parties who should be joined in this action.

Schwartz ■ Edelstein Law Group LLC  
Attorneys for Plaintiffs

By: 

STEPHEN J. EDELSTEIN

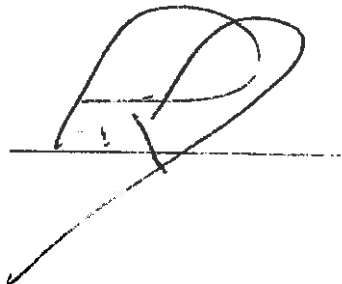
Date: April 16, 2018

VERIFICATION

Dr. Felix Roque, of full age, states as follows:

1. I have read the Verified Complaint and aver that the facts contained therein are true to the best of my knowledge 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.

A handwritten signature in black ink, appearing to be 'F. Roque', is written over a horizontal line. The signature is stylized with a large loop at the top and a long, sweeping tail that extends downwards and to the left.

Dated: April 16, 2018

Stephen J. Edelstein, Esq. – 285031972  
Schwartz ■ Edelstein Law Group LLC  
100 South Jefferson Road, Suite 200  
Whippany, New Jersey 07981  
(973) 301-0001  
Attorneys for Plaintiffs

DR. FELIX ROQUE and DEMOCRATS  
FOR HUDSON COUNTY

Plaintiffs

vs.

HUDSON COUNTY DEMOCRATIC  
ORGANIZATION, JONATHAN  
CASTANEDA, CARMELA RICCIE,  
West New York Municipal Clerk, and E.  
JUNIOR MALDONADO, Hudson  
County Clerk

Defendants

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

CIVIL ACTION

**ORDER TO SHOW CAUSE**

THIS MATTER being brought before the court by Schwartz Edelstein Law Group, LLC, attorneys for plaintiffs, seeking relief by way of an Order to Show Cause, based upon the facts set forth in the Verified Complaint filed herewith; and good cause shown for the entry of this Order to Show Cause

It is on this \_\_\_\_ day of \_\_\_\_\_ ORDERED that defendants Hudson County Democratic Organization (“HCDO”) and Jonathan Castaneda appear and show cause before the Superior Court at the Hudson County Courthouse in Jersey City, New Jersey, Hon. \_\_\_\_\_, at \_\_\_\_ o’clock in the \_\_\_\_ noon or as soon thereafter as counsel can be heard, on the \_\_\_\_\_ day of \_\_\_\_\_, 2018 why an Order should not be granted issuing the following relief:



- A. Invalidating the nominating Petitions for the office of West New York Democratic Municipal Committee filed by the HCDO on April 2, 2018;
- B. Prohibiting the named candidates from being placed on the ballot in the June 2018 Election;
- C. Granting a plenary hearing in this matter;
- D. Granting such other relief as the court deems equitable and just.

And it is further ORDERED that:

Within \_\_ days of the date of this Order to Show Cause, Jonathan Castaneda shall appear at the West New York Municipal Building to be deposed by counsel for the Plaintiffs at 10:30 a.m., the exact date to be determined by counsel for plaintiffs and defendants, to be continued until the deposition is completed; and

And it is further ORDERED that

1. A copy of this Order to Show Cause, Verified Complaint, legal brief and any supporting affidavits or certifications submitted in support of this application be served upon the defendants within \_\_\_\_ days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

2. The plaintiffs must file with the court a proof of service of the pleadings on the defendants no later than three (3) days before the return date.

3. Defendants shall file and serve a written response to this order to show cause and proof of service by \_\_\_\_\_, 2018. 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](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 \_\_\_\_\_, New Jersey. 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 \$ \_\_\_\_\_ and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking.

4. The plaintiffs must file and serve any written reply to the defendants' order to show cause opposition by \_\_\_\_\_, 2018. 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 \_\_\_\_\_.

5. If the defendants do not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the plaintiffs file a proof of service and a proposed form of order at least three days prior to the return date.

6. If the plaintiffs have not already done so, a 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.

7. Defendants take notice that the plaintiffs have 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 within 35 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](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf). Include a \$\_\_\_\_\_ filing fee payable to the "Treasurer State of New Jersey." 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 file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

8. 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](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).

9. 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.

---

J.S.C.



# Schwartz ■ Edelstein

LAW GROUP<sub>LLC</sub>

100 South Jefferson Road ■ Suite 200 ■ Whippany, New Jersey 07981 ■ Tel: 973.301.0001 ■ Fax: 973.993.3152  
www.selawgroup.com

*Please Reply to Whippany Office*

April 16, 2018

Stephen Edelstein  
Sedelstein@selawgroup.com

**Electronically Filed**  
Honorable Peter F. Bariso, Jr.  
Assignment Judge, Hudson County  
Superior Court  
Hudson County Administration Building  
595 Newark Avenue, 9<sup>th</sup> Floor  
Jersey City, NJ 07306

**RE: Dr. Felix Roque and Democrats for  
Hudson County v. Hudson County  
Democratic Organization, et als.**

Dear Judge Bariso:

This office represents the plaintiffs in the above matter. Please accept this Letter Brief in support of the Verified Complaint and Order to Show Cause filed concurrently with it.

This action is commenced by Verified Complaint pursuant to N.J.S.A. 19:13-1, et seq. to invalidate the Petitions filed by the Hudson County Democratic Organization to place on the ballot candidates for the West New York Democratic Municipal Committee. Because the main bad actor in this case is Jonathan Castaneda, and because he failed to comply with the Clerk's subpoena to appear

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Executive Campus  
600 Birchfield Drive  
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08054  
973.301.0001

*New York Office:*  
415 Madison Avenue  
16th Floor  
New York, New York  
10017  
212.752.5258

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Honorable Peter F. Bariso, Jr.  
Assignment Judge, Hudson County  
April 16, 2018  
Page 2

at the Clerk's hearing on the objection to the challenged petitions, it is of key importance both that plaintiffs be permitted to depose Mr. Castaneda and that the Court conduct a plenary hearing with regard to the petitions.

The Verified Complaint sets forth a legally sufficient basis for the Court to act. Petitions must be circulated and signed with the candidates' names appearing, as required by N.J.S.A 19:3-4. N.J.S.A 19:3-4: "[s]uch petition shall set forth the names, places of residence and post-office addresses of the candidates for the office to be filled . . . ." Here, they were not. This is a blatant violation of the election laws and of the rights of the voters who were misled into signing the petitions.

Moreover, some demonstrated fraud is sufficient to invalidate all the petitions. By way of example, In McCaskey v. Kirchoff, the Appellate Division, faced with fraudulent signatures on a nominating petition, held that the fraud and wrongdoing went to the heart of the petition and rendered the entire petition invalid. 56 N.J. Super. 178, 179 (App. Div. 1959).

In McCaskey, plaintiff sought to invalidate a nominating petition on the grounds that at least two (2) of the one hundred and ten (110) signatures on the petition were forged. In addition, two of the five persons who swore to the petition knew that the signatures were not genuine. Id. The Appellate Division,



Honorable Peter F. Bariso, Jr.  
Assignment Judge, Hudson County  
April 16, 2018  
Page 3

rather than removing the two known forged signatures, invalidated the entire petition. Id.

The Appellate Division reasoned that the salutary purpose of the Election Act is to purify the politics of this State by preventing fraud and wrongdoing in the nominating procedure. The Appellate Division held that the court below should have declared the petition invalid, instead of eliminating some of the signatures and holding that the remainder were enough to meet the minimum requirement of N.J.S.A. 19:13-5. Id. at 183. This discredited argument is likely the one that defendants will make here.

The Court stated:

If designating petitions are to perform their lawful and intended function, it is essential that they be kept free from fraud in the making. It is to that end that the legislature has made meticulous requirements with respect to them. The surest way to keep them free from fraud is to let it be known that any taint of fraud will wholly invalidate them, rather than merely set the court to the task of counting up the number of fraudulent instances in order to see whether they reduce the number of signatures below the minimum required by law." Id. at 183 quoting Weisberger v. Cohen, 22 N.Y.S.2d 1011 (Sup. Ct. 1940), affirmed 260 App. Div. 392, 22 N.Y.S.2d 835 (App. Div. 1940) (therein the Court rejected not merely the forged signatures but the whole petition, as founded on a false authentication).

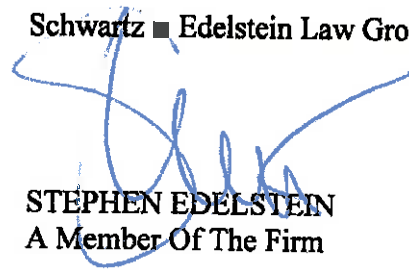


Honorable Peter F. Bariso, Jr.  
Assignment Judge, Hudson County  
April 16, 2018  
Page 4

The same reasoning applies here. Once the testimony of Mr. Castaneda is obtained – which is essential – there will be an adequate basis to invalidate all of the HCDO West New York Democratic Municipal Committee petitions.

Respectfully,

Schwartz ■ Edelstein Law Group LLC



STEPHEN EDELSTEIN  
A Member Of The Firm

SJE/al



Schwartz ■ Edelstein

LAW GROUP LLC

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100 South Jefferson Road, Suite 200  
Whippany, New Jersey 07981  
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Attorneys for Plaintiffs

DR. FELIX ROQUE and DEMOCRATS  
FOR HUDSON COUNTY

Plaintiffs

vs.

HUDSON COUNTY DEMOCRATIC  
ORGANIZATION, JONATHAN  
CASTANEDA, CARMELA RICCIE,  
West New York Municipal Clerk, and E.  
JUNIOR MALDONADO, Hudson  
County Clerk

Defendants

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

CIVIL ACTION

CERTIFICATION OF  
STEPHEN EDELSTEIN

**I, STEPHEN J. EDELSTEIN, ESQ.,** of full age, hereby certify as follows:

1. I am an attorney-at-law of the State of New Jersey and a Member of the law firm of Schwartz Edelstein Law Group, LLC, attorneys for Plaintiff, Democrats for Hudson County ("Plaintiff") in the above-referenced matter. I make this Certification in support of the Plaintiffs' Verified Complaint relief against the Hudson County Democratic Organization ("Defendant").

2. Attached hereto as Exhibit A is a true and accurate copy of the Subpoena Ad Testificandum directed towards Jonathan Castaneda.

3. Attached hereto as Exhibit B is a true and accurate copy of the e-mail from Jonathan Castaneda to West New York Town Clerk.



4. Attached as Exhibit C is a true and accurate copy of the objection filed by the Democrats for Hudson County.

5. Attached as Exhibit D is a copy of the Clerk's ruling on the objection.

I hereby 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.



---

STEPHEN J. EDELSTEIN

Dated: April 16, 2018

**EXHIBIT A**



**ANTONELLI KANTOR, P.C.**  
1000 Stuyvesant Avenue  
Suite #1  
Union, New Jersey 07083  
Tel.: 908-623-3676  
Fax: 908-866-0336  
Daniel Antonelli- (00684-1997)  
Charles Simmons - (10020-2014)  
Attorneys for Carmela Riccio,  
West New York's Town Clerk

IN THE MATTER OF OBJECTIONS TO  
PETITIONS FILED BY CANDIDATES  
RUNNING FOR WEST NEW YORK  
DEMOCRATIC MUNICIPAL  
COMMITTEE UNDER THE SLOGAN  
"HUDSON COUNTY DEMOCRATIC  
ORGANIZATION.

STATE OF NEW JERSEY, HUDSON  
COUNTY, TOWN OF WEST NEW YORK,  
TOWN CLERK'S OFFICE

**SUBPOENA AD TESTIFICANDUM**

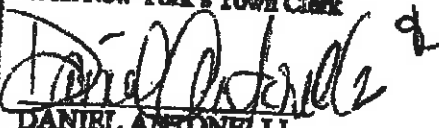
**THE STATE OF NEW JERSEY, TO:**

Jonathan Castaneda  
6511 Madison Street, Apt. 3  
West New York, New Jersey 07093

**YOU ARE HEREBY COMMANDED** to attend and give testimony in the above  
referenced matter, at West New York Town Clerk's Office, Room 2, Municipal Building, 428-60<sup>th</sup>  
Street, West New York, New Jersey 07093, on April 11, 2018 at 10:30 a.m. and once there, to  
testify as a witness in the above captioned matter.

Failure to appear or comply according to the command of this Subpoena will subject you  
to a penalty, damages in a Civil Suit and punishment for contempt of Court.

**ANTONELLI KANTOR, P.C.**  
Attorneys for Carmela Riccio,  
West New York's Town Clerk

  
**DANIEL ANTONELLI**

/s/ Michelle M. Smith  
Michelle M. Smith, Esq.  
Clerk, Superior Court of New Jersey

Dated: April 10, 2018

**EXHIBIT B**

**CARMELA RICCIE**

**From:** Jonathan Castaneda <jonathanfcastaneda@gmail.com>  
**Sent:** Wednesday, April 11, 2018 9:22 AM  
**To:** CARMELA RICCIE  
**Subject:** Subpoena 4/11



Good Morning Carmela,

Please be advised that I received a subpoena last evening, (dated Tuesday, April 10, 2018) at 7:00PM to appear before you this morning, Wednesday, April 11, 2018 at 10:30AM.

This subpoena was handed to me only hours before a hearing, and I am not available on such unreasonably short notice. I received this notice late in the evening well after business hours were over, and I do not feel comfortable with this.

I will not be attending this morning to serve as a witness, as I need an opportunity to speak with legal counsel before appearing for a subpoena.

Thank you for your attention.

Sincerely

Jonathan Castaneda

**EXHIBIT C**



# Schwartz & Edelstein

LAW GROUP LLC

100 South Jefferson Road ■ Suite 200 ■ Whippany, New Jersey 07981 ■ Tel: 973.301.0001 ■ Fax: 973.993.3152  
www.sclawgroup.com

*Please Reply to Whippany Office*

April 6, 2018

RECEIVED  
2018 APR -6 P 3:58  
TOWN CLERK'S OFFICE  
WEST NEW YORK, N.J.

Stephen J. Edelstein  
s.edelstein@sclawgroup.com

**Hand Delivered**  
Carmela Riccio, Town Clerk  
Town of West New York  
Town Hall  
428-60<sup>th</sup> Street  
West New York, NJ 07093

**RE: West New York Democratic Municipal  
Committee**

Dear Ms. Riccio:

This office represents the candidates for West New York Democratic Municipal Committee who are running using the slogan Democrats for Hudson County.

Please accept this letter as an objection on behalf of those candidates to the petitions for West New York Democratic Municipal Committee filed by Cosmo Cirillo on behalf of all candidates using the slogan Hudson County Democratic Organization.

The basis for this objection is that the petitions to which we object were circulated without candidate names, which were added later, after the nominating signatures were obtained. In addition, the circulator of the petitions, Mr. Jonathan Castaneda, misled signers into believing that the petitions were for a different office.

*South Jersey Office:*  
Twin Ponds  
Executive Campus  
660 Birchfield Drive  
Suite 603-A  
Mt. Laurel, NJ  
08054  
973.301.0001

*New York Office:*  
415 Madison Avenue  
16th Floor  
New York, New York  
10017  
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Carmela Riccio, Town Clerk  
April 6, 2018  
Page 2

In support of these contentions, I am enclosing Affidavits which verify these facts. Due to time constraints, these are a representative sampling of what we believe is universally the case.

Under the circumstances, we ask that you conduct whatever investigation you deem appropriate and then invalidate the challenged petitions in their entirety.

All of the objectors are registered voters of the Municipality of West New York.

Very truly yours,

Schwartz ■ Edelstein Law Group LLC



STEPHEN J. EDELSTEIN  
A Member Of The Firm

SJE/al



**Schwartz ■ Edelstein**  
LAW GROUP LLC

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**EXHIBIT D**

**IN THE MATTER OF OBJECTIONS TO  
PETITIONS FILED BY CANDIDATES  
RUNNING FOR WEST NEW YORK  
DEMOCRATIC MUNICIPAL COMMITTEE  
UNDER THE SLOGAN "HUDSON  
COUNTY DEMOCRATIC  
ORGANIZATION.**

**STATE OF NEW JERSEY, HUDSON  
COUNTY, TOWN OF WEST NEW YORK,  
TOWN CLERK'S OFFICE**

**OPINION BY CARMELA RICCIE,  
TOWN CLERK**

**As the filing officer for nominations to office for the Town of West New York, I issue this summary review of objection and challenges to petitions under N.J.S.A. 19:13-11.**

**In the Town of West New York this year, there are Democratic Municipal Committees competing for election in the June 2018 General Election.**

**On April 2, 2018, candidates running for the West New York Democratic Municipal Committee under the slogan "Hudson County Democratic Organization" filed nominating petitions for the June 2018 Hudson County Democratic County Committee for full terms of office (hereinafter referred to as "HCDO"). (Exhibits J-1, J-2, HCDO-6, HCDO-7)**

**The candidates accepted the nomination for office and signed the candidate's oath on the petitions. (Exhibits J-1, J-2, HCDO-6, HCDO-7). The petition of Bonnie Rodriguez and Joseph Rodriguez was circulated by Joseph Rodriguez who signed the circulators affidavit thereon before a notary public of the State of New Jersey on April 1, 2018. (Exhibits J-2). The petition of Claudia Blanco and Jose Mendoza was circulated by Claudia who signed the circulators affidavit. (Exhibits J-1). While Claudia Blanco signed such petition, Jose Mendoza's signature is next to the notary public's signature line. (Exhibit J-1). The petition of Patricia Delgado and Jorge Delgado were circulated by Jorge Delgado who signed the circulators affidavit thereon before a notary public of the State of New Jersey on April 1, 2018. (HCDO-6). The petition of Ivonne Arroyo and Albeiro Raigosa was circulated by Albeiro Raigosa who signed the circulators affidavit thereon before a notary public of the State of New Jersey on February 16, 2018. (HCDO-7).**

On April 6, 2018, Stephen Edelstein, Esq. filed a written objection on behalf of the candidates for West New York Democratic Municipal Committee running using the slogan "Democrats for Hudson County (hereinafter the "Objectors") to the nominating petitions for West New York Democratic Municipal Committee filed on behalf of all candidates using the slogan "Hudson County Democratic Organization." (HCDO-4).

Pursuant to statute, a hearing was conducted on April 11, 2018 at 10:30 a.m. at Town Hall by me, along with Daniel Antonelli, of the law firm Antonelli Kantor, P.C., as my counsel, before a court reporter and the witnesses' testimony under oath. Stephen Edelstein, Esq. appeared on behalf of the Objectors while Steven Kleinman, Esq. appeared on behalf of HCDO.

Appearing at the hearing and offering testimony were following witnesses:

	<b>Name</b>	<b>Address</b>	<b>Called by</b>
1.	Magda Alfonzo	6119 Highland Pl., West New York, NJ	Steven Kleinman
2.	Milagros Rodriguez	6119 Highland Pl., West New York, NJ	Steven Kleinman

The following documents were offered as evidence:

**Joint Exhibits:**

- J-1: The petition of Claudia Blanco and Jose Mendoza
- J-2: The petition of Bonnie Rodriguez and Joseph Rodriguez

**HCDO's Exhibits:**

- C-1: Affidavit of Claudia Blanco dated April 6, 2018
- C-2: Affidavit of Jose Mendoza dated April 6, 2018
- C-3: Affidavit of Jose Alcantaro dated April 6, 2018
- C-4: Letter from Jose Alcantaro withdrawing his signature from Exhibit J-1
- C-5: Letter from Claudia Blanco withdrawing her signature from Exhibit J-1
- C-6: Letter from Jose Mendoza withdrawing his signature from Exhibit J-1
- C-7: *Subpoena ad testificandum* for Jonathan Castaneda

C-8: Proof of personal service of *Subpoena ad testificandum* for Jonathan Castaneda

C-9: Email from Jonathan Castaneda to Clerk responding to *Subpoena ad testificandum*

**HCDO's Exhibits:**

HCDO-1: Affidavit of Bonnie Rodriguez dated April 10, 2018

HCDO-2: Affidavit of Glenn Rodriguez dated April 10, 2018

HCDO -3: Affidavit of Sonia Vargas dated April 10, 2018

HCDO -4: Letter from Stephen Edelstein, Esq. dated April 6, 2018 objection to petitions

HCDO -5: Affidavit of Alberio Raigosa dated April 6, 2018

HCDO -6: The petition of Patricia Delgado and Jorge Delgado

HCDO -7: The petition of Ivonne Arroyo and Alberio Raigosa

**Presumption of Validity of Petitions**

Under the provisions of N.J.S.A. 19:13-10, entitled "Objection to petition" it states:

Every petition of nomination in apparent conformity with the provisions of this Title shall be deemed to be valid, unless objection thereto be duly made in writing and filed with the officer with whom the original petition was filed not later than the fourth day after the last day for filing of petitions. If such objection is made, notice thereof signed by such officer shall forthwith be mailed to the candidate who may be affected thereby, addressed to him at his place of residence as given in the petition of nomination.

(Emphasis added).

Under the provisions of N.J.S.A. 19:13-11, entitled "Determination of validity of objections" it states:

The officer with whom the original petition was filed shall in the first instance pass upon the validity of such objection in a summary way unless an order shall be made in the matter by a court of competent jurisdiction and for this purpose such officer shall have power to subpoena witnesses and take testimony or depositions. He shall file his determination in writing in his office on or before the

ninth day after the last day for the filing of petitions, which determination shall be open for public inspection.

There is a presumption under the statute that the petitions as prepared and circulated shall be deemed valid if the petitions on their face and within the four corners of the document are in apparent conformity with the law. These petitions did so appear and were accepted for filing and nomination of the "Candidates."

#### Objectors' Burden

That presumption is now challenged by the "Objectors" and the burden rests on the "Objectors" to prove and support the allegations set forth in the challenge by a preponderance of the evidence.

#### Objectors' Allegations

The "Objectors" allege: (1) the petitions were circulated without candidate names which were added after the nominating signatures were obtained; (2) Jonathan Castaneda misled signers into believing that the petitions were for a different office; and (3) Claudia Blanco, Jose Mendez, Jose Alcantaro and Albeiro Raigosa would have never signed a petition supporting a Municipal Committee Candidate running under the banner of the Hudson County Democratic Organization.

#### Hearing Testimony

During the proceeding both Magda Alfonso and Milagros testified that Jose Rodriguez came to their home and, after explaining the petition, asked them to sign. Ms. Alfonso testified that her signature appears on line 8 of Exhibit J-2 and that she is eligible to vote as a registered Democrat. Ms. Rodriguez testified that her signature appears on line 9 of Exhibit J-2. They both testified that they support Joseph Rodriguez's petition and wish to have him appear on the ballot for the election. They both also testified that the names of both Bonnie Rodriguez and Joseph Rodriguez were on the petition when they signed.

Mr. Edelstein and Mr. Kleinman both relied on Affidavits in lieu of testimony as to these affidavits. As to Exhibit HCDO-6, Mr. Edelstein stipulated that Albeiro Raigosa's signature was nowhere on the petition.

Jonathan Castaneda was served a subpoena to appear for the hearing. That subpoena was duly served on April 10, 2018 at approximately 7:00 p.m. Despite being under subpoena, Mr. Castaneda failed to appear. (Exhibits C-7, C-8, C-9). The Objectors have asked for an adverse inference to be drawn from Mr. Castaneda's failure to appear at the hearing.

### Findings of Fact and Decision

1. Albeiro Raigosa did not sign the petition of Patricia Delgado and Jorge Delgado.
2. Joseph Rodriguez was the circulator for the petition of Bonnie Rodriguez and Joseph Rodriguez.
3. Claudia Blanco and/or Jose Mendoza were the circulator(s) for the petition of Claudia Blanco and Jose Mendoza.
4. Jorge Delgado was the circulator for the petition of Patricia Delgado and Jorge Delgado.
5. Albeiro Raigosa was the circulator for the petition of Ivonne Arroyo and Albeiro Raigosa.
6. Milagros Rodriguez was a credible witness.
7. Magda Alfonso was a credible witness.

N.J.S.A. 19:13-4, entitled "Contents of petition" states:

**Such petition shall set forth the names, places of residence and post-office addresses of the candidates for the offices to be filled, the title of the office for which each candidate is named, that the petitioners are legally qualified to vote for such candidates and pledge themselves to support and vote for the persons named in such petition and that they have not signed any other petition of nomination for the primary or for the general election for such office.**

(Emphasis added)

The New Jersey Supreme Court in Catania v. Haberle, 123 N.J. 438 (1991), established the rule that unless there was a strong public interest prohibiting a candidate from appearing on the ballot, the candidate and the voters should be afforded that opportunity.

The general rule applied to the interpretation of our election laws is that absent some public interest sufficiently strong to permit the conclusion that the Legislature intended strict enforcement, statutes providing requirements for a candidate's name to appear on the ballot will not be construed so as to deprive the voters of the opportunity to make a choice. *Id.* at 442-443

As referred to in Catania, supra., the strong public interest that would nullify a nominating petition would be a failure to comply with a mandatory election law or fraud which is not apparent here. Baker v. Deane, 196 N.J. Super. 416 (1983).

Objectors have put forth four affidavits in support of the extraordinary request to invalidate all HCDO's petitions. These affidavits are not persuasive. First, the affidavit of Albeiro Raigosa is not truthful in that it repeatedly states he signed Exhibit HCDO-6. There is a stipulation that Albeiro Raigosa's signature is not present on Exhibit HCDO-6. Consequently, the Objectors have not met their burden as to Exhibit HCDO-6.

The Objectors remaining affidavits apply to Exhibit J-2. The contention from these affiants that they would have never supported a municipal candidate running under HCDO's slogan is directly contradicted by Exhibit J-1 where all three affiants signed another petition under the slogan "Hudson County Democratic Organization." Additionally, Exhibit J-1 shows that Claudia Blanco and Jose Mendoza not only signed a petition under this slogan, but were endorsing themselves as candidates under such slogan. To the extent that the Objectors rely exclusively on these affidavits in support of their objection, the petitions shall remain valid and Objectors have not come close to meeting their burden. Perhaps, if Jonathan Castendan had appeared, his testimony may have added support to Objectors' claims. Based on the record before me, I conclude that the Objections have not met their burden.

To the extent that the Objectors have asked for an adverse inference to be drawn from Mr. Castaneda's failure to appear, to invalidate all the petitions based on an adverse inference is an extraordinary request. However, based upon the record before me it would appear that the testimony of Mr. Castaneda would be necessary and relevant to the issues raised by the Objectors to wit: her circulated petitions without the candidates' names set forth on the petition as required by N.J.S.A. 19:3-4.

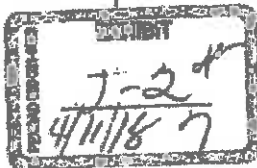
Therefore, Objectors have failed to meet their burden of proof by a preponderance of the evidence, and I am DENYING their request to invalidate the petitions of HCDO.



**NOTICE OF APPEAL AND REVIEW**

**N.J.S.A. 19:13-12, entitled "Judicial hearing":**

**Any judge of the Superior Court, in the case of candidates to be voted for by the electors of the entire State or of more than one county thereof, and in all other cases a judge of the Superior Court assigned to the county in which any petition of nomination shall be filed, on the application or complaint, duly verified, of any candidate, which application or complaint shall be made on or before the twelfth day after the last day for the filing of petitions, setting forth any invasion or threatened invasion of his rights under the petition of nomination filed with the Secretary of State or with any county clerk, shall hear such application or complaint in a summary way and make such order thereon as will protect and enforce the rights of such candidates, which order or determination shall be filed within three days after the filing of the application or complaint.**



# Town of West New York Ciudad de West New York

**Names and Addresses Must Be Plainly Written and Printed  
WRITE FIRST NAME IN FULL**  
**Los nombres y las direcciones deben ser escritos claramente en letras de molde.  
ESCRIBA EL NOMBRE DE PILA COMPLETO.**

## Primary Petition for Members of the Hudson County DEMOCRATIC County Committee

Petición Primaria para los Miembros del Comité del Condado  
DEMOCRATA del Condado de Hudson

3  
WARD/DISTRITO ELECTORAL  
TO/A: CARMELA RICCIE  
Town Clerk/Secretaria Municipal

1  
DISTRICT/DISTRITO  
RECEIVED  
MAY 11 2 4 10 PM '18  
TOWN CLERK'S OFFICE  
WEST NEW YORK, N.J.

We, the undersigned, hereby declare that we are qualified legal voters of 3 Ward 1 Election District of the Town of West New York, in which District we all reside, that we are members of the DEMOCRATIC Party, and that we and each of us intend to affiliate with the said DEMOCRATIC Party at the ensuing election, and that we and each of us hereby endorse:

Nosotros, los abajo firmantes, declaramos por la presente que somos votantes legalmente elegibles del distrito electoral 3 distrito de la ciudad de West New York, en dicho distrito vivimos, que somos miembros del Partido DEMOCRATA y que es nuestra intención afiliarnos a dicho Partido DEMOCRATA en las elecciones subsecuentes, y que apoyamos a:

- | NAME IN FULL<br>(Print)<br>NOMBRE COMPLETO<br>(Escriba en letras de molde)      | RESIDENCE AND P.O. ADDRESS<br>(Print)<br>RESIDENCIA Y DIRECCIÓN<br>(Escriba en letras de molde) |
|---|---|
| 1. <u>Bonnie Rodriguez - Bonnie Rodriguez - 6123 Highland Place 07093</u>       |   |
| 2. <u>Joseph F. Rodriguez - Joseph F. Rodriguez - 6123 Highland Place 07093</u> |   |

as candidates for nomination to the office of Members of the Hudson County DEMOCRATIC County Committee of the 3 Ward 1 District of the Town of West New York, and we request that you print upon the official Primary ballot of the DEMOCRATIC Party the names of the persons above herein mentioned, and we hereby certify that they are legally qualified under the laws of this State to be nominated to said office and that said persons so endorsed are members of the political party named in this petition.

como candidatos para la nominación a los puestos de miembros del Comité del Condado DEMOCRATA del Condado de Hudson del 3 distrito electoral 1 distrito de la ciudad de West New York, y solicitamos que se ordene imprimir los nombres de las antedichas personas en la balota primaria oficial del Partido DEMOCRATA y certificamos por la presente que ellos llenan los requisitos legales según las leyes del Estado para ser nombrados para dichos puestos y además certificamos que dichas personas son miembros del partido político estipulado en esta petición.

1. Bonnie Rodriguez  
SIGNATURE/FIRMA  
6123 Highland Place  
Residence address/Dirección

2. Joseph F. Rodriguez  
SIGNATURE/FIRMA  
6123 Highland Place  
Residence address/Dirección

Bonnie Rodriguez  
PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
West New York  
City/Ciudad

Joseph F. Rodriguez  
PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
West New York  
City/Ciudad

- |  |   |
|--|---|
| <p>3. <u>[Signature]</u><br/>SIGNATURE/FIRMA<br/><u>6100 Highland Place</u><br/>Residence address/Dirección</p>  | <p><u>Jose m Alconera</u><br/>PRINT Name/Escribe el nombre en LETRAS DE MOLDE<br/><u>West New York</u><br/>City/Ciudad</p>          |
| <p>4. <u>[Signature]</u><br/>SIGNATURE/FIRMA<br/><u>6035 Blvd E. Apt B1</u><br/>Residence address/Dirección</p>  | <p><u>Jose R. Navarro</u><br/>PRINT Name/Escribe el nombre en LETRAS DE MOLDE<br/><u>West New York</u><br/>City/Ciudad</p>          |
| <p><u>[Signature]</u><br/>SIGNATURE/FIRMA<br/><u>6035 Blvd. E Apt B1</u><br/>Residence address/Dirección</p>     | <p><u>Claudia Blanco Altoso</u><br/>PRINT Name/Escribe el nombre en LETRAS DE MOLDE<br/><u>West New York</u><br/>City/Ciudad</p>    |
| <p>5. <u>[Signature]</u><br/>SIGNATURE/FIRMA<br/><u>623 Highland Place</u><br/>Residence address/Dirección</p>   | <p><u>CARIDAD RODRIGUEZ</u><br/>PRINT Name/Escribe el nombre en LETRAS DE MOLDE<br/><u>West New York</u><br/>City/Ciudad</p>        |
| <p>7. <u>[Signature]</u><br/>SIGNATURE/FIRMA<br/><u>623 Highland Place</u><br/>Residence address/Dirección</p>   | <p><u>Stanna Varkots</u><br/>PRINT Name/Escribe el nombre en LETRAS DE MOLDE<br/><u>West New York</u><br/>City/Ciudad</p>           |
| <p>8. <u>[Signature]</u><br/>SIGNATURE/FIRMA<br/><u>6119 Highland Pl.</u><br/>Residence address/Dirección</p>    | <p><u>MACAIA ALFONSO</u><br/>PRINT Name/Escribe el nombre en LETRAS DE MOLDE<br/><u>West New York</u><br/>City/Ciudad</p>           |
| <p>9. <u>[Signature]</u><br/>SIGNATURE/FIRMA<br/><u>6119 HIGHLAND PL</u><br/>Residence address/Dirección</p>     | <p><u>PILAGROS RODRIGUEZ</u><br/>PRINT Name/Escribe el nombre en LETRAS DE MOLDE<br/><u>W NEW YORK NJ 07093</u><br/>City/Ciudad</p> |
| <p>10. <u>[Signature]</u><br/>SIGNATURE/FIRMA<br/><u>6127 Highland PL</u><br/>Residence address/Dirección</p>    | <p><u>Osma Garcia</u><br/>PRINT Name/Escribe el nombre en LETRAS DE MOLDE<br/><u>West New York</u><br/>City/Ciudad</p>              |
| <p>11. <u>[Signature]</u><br/>SIGNATURE/FIRMA<br/><u>6121 Highland PL</u><br/>Residence address/Dirección</p>    | <p><u>GLENN RODRIGUEZ</u><br/>PRINT Name/Escribe el nombre en LETRAS DE MOLDE<br/><u>West New York</u><br/>City/Ciudad</p>          |
| <p>12. <u>[Signature]</u><br/>SIGNATURE/FIRMA<br/><u>6121 Highland Place</u><br/>Residence address/Dirección</p> | <p><u>Amy Rodriguez</u><br/>PRINT Name/Escribe el nombre en LETRAS DE MOLDE<br/><u>West New York</u><br/>City/Ciudad</p>            |

STATE OF NEW JERSEY }  
COUNTY OF HUDSON } s.s.

Affidavit of Person Who Circulates This Petition and Witnesses Signatures  
(To be signed by Circulator) (N.J.S.A. 19:23-11)

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

STATE OF NEW JERSEY }  
COUNTY OF HUDSON } s.s.

I, Joseph F. Rodriguez of full age, being duly sworn or affirmed upon his/her oath depose and say that said petition is signed by each of the signers thereof in his/her own proper handwriting; that each of the signers is, to the best knowledge and belief of deponent, a legal voter of the Town of West New York.

Ward 3, District 1, in the County of Hudson of the State of New Jersey, as stated in said petition, and belongs to the political party named in said petition; and that such petition is prepared and filed in absolute good faith for the sole purpose of endorsing the person named therein in order to secure his/her nomination or election as stated in said petition; and further affirm that I am a registered voter in the State of New Jersey, whose party affiliation is of the same political party named in the petition.

Declaración Jurada de la persona que Circula esta Petición y las Firmas de Testigos (Debe ser firmado por el Circulante) (N.J.S.A. 19:23-11)

El testigo que obtenga esta declaración jurada debe ser la misma persona que obtenga las firmas en esta petición. El circulante debe llevar la declaración jurada para que él/ella solicite una petición y firme en presencia de una persona autorizada que administra declaraciones juradas (por ejemplo un notario público).

ESTADO DE NUEVA JERSEY }  
CONDADO DE HUDSON } s.s.

Yo, \_\_\_\_\_ siendo mayor de edad, habiendo declarado bajo juramento

que declara que es uno de los firmantes de la antedicha petición; que la antedicha petición ha sido firmada por cada uno de los firmantes de su puño y letra; de acuerdo a su mejor conocimiento y creencias del momento, votantes legales del Municipio de West New York, Distrito Electoral \_\_\_\_\_, Distrito \_\_\_\_\_, en el Condado de Hudson del Estado de Nueva Jersey, como se indica en dicha petición, y afiliados al partido político de dicha petición; y tal petición es preparada y presentada de buena fe con el único intención de apoyar a la persona nombrada como candidato con el fin de asegurar su nominación o elección como indica en dicha petición; yo afirmo además que soy un votante registrado en el Estado de Nueva Jersey, cuyo partido político es el mismo en esta petición.

Subscribed and sworn to this \_\_\_\_\_ day of April, 2018 at West New York before me

Jurado y declarado ante mí este \_\_\_\_\_ día de \_\_\_\_\_ de 2018 en \_\_\_\_\_

*[Signature]*  
Notario Público/Notario

*[Signature]*  
One of the above 10 signers above oath and signs name here  
Uno de los 10 firmantes anteriores presta juramento y firma aquí  
*Joseph F. Rodriguez*  
PRINT NAME/ESCRIBA EL NOMBRE EN LETRAS DE MOLDE

WRITE PLAIN AND FIRST NAME IN FULL

We hereby declare that we are legally qualified for the office of Members of the Hudson County Democratic County Committee mentioned in the foregoing petition, and we hereby consent to stand as candidates for said nomination at the ensuing Primary Election and if nominated we hereby agree to accept said nomination.

ESCRIBA CLARAMENTE EL NOMBRE COMPLETO

Nosotros declaramos por la presente que llenamos los requisitos legales para los puestos de Miembros del Comité del Condado Democrata del Condado de Hudson, como mencionado en la petición anterior, y consentimos por la presente en presentarnos como candidatos para dichas nominaciones en las elecciones primarias subsecuentes, y si somos nombrados, consentimos en aceptar dichas nominaciones.

- | NAME/NOMBRE  | RESIDENCE AND P.O. ADDRESS/RESIDENCIA Y DIRECCIÓN   |
|--|---|
| 1. <i>[Signature]</i><br>RESIDENTIAL ADDRESS:<br>1123 Highland Place | <i>Bank Rodriguez</i><br>PRINT NAME/ESCRIBA EL NOMBRE EN LETRAS DE MOLDE<br>West New York<br>City/Town      |
| 2. <i>[Signature]</i><br>RESIDENTIAL ADDRESS:<br>1123 Highland Place | <i>Joseph F. Rodriguez</i><br>PRINT NAME/ESCRIBA EL NOMBRE EN LETRAS DE MOLDE<br>West New York<br>City/Town |

WRITE PLAIN AND FIRST NAME IN FULL  
ESCRIBA CLARAMENTE EL NOMBRE COMPLETO

We, the above endorsed candidates for the office of Members of the Hudson County DEMOCRATIC County Committee, do hereby request you to group together and bracket our names, and to print opposite our names so bracketed, on the said Primary Ticket for the ensuing Primary Election, the following designation:

Nosotros, los antedichos candidatos apoyados para los puestos de Miembros del Comité del Condado DEMOCRATA del Condado de Hudson, pedimos por la presente que nuestros nombres sean colocados juntos entre corchetes y que se ordene imprimir la siguiente designación enfrente de nuestros nombres entre los corchetes en la balota primaria para las elecciones primarias subsecuentes:

*Bank Rodriguez* *Joseph F. Rodriguez*  
SIGNATURE/FIRMA SIGNATURE/FIRMA  
*Bank Rodriguez* *Joseph F. Rodriguez*  
PRINT Name/ Escriba el nombre en LETRAS DE MOLDE PRINT Name/ Escriba el nombre en LETRAS DE MOLDE

Notice: All candidates are required by law to comply with the provisions of the "New Jersey Campaign Contributions and Expenditures Report Act". For further information, please call the Election Law Enforcement Commission 609-222-8700 or 609-810-8582.



Town of West New York
Ciudad de West New York

Names and Addresses Must Be Plainly Written and Printed
WRITE FIRST NAME IN FULL
Los nombres y las direcciones deben ser escritos claramente en letras de molde.
ESCRIBA EL NOMBRE DE PILA COMPLETO.

Primary Petition for Members of the Hudson County DEMOCRATIC
County Committee

Peticion Primaria para los Miembros del Comité del Condado
DEMOCRATA del Condado de Hudson

3
WARD/DISTRITO ELECTORAL
TOWA: CARMELA RIGGIE
Town Clerk/Secretario/a Municipal

1
DISTRICT/DISTRITO

RECEIVED
MAY 11 - 2, P 2 N.Y.
TOWN CLERK'S OFFICE
WEST NEW YORK, N.J.

We, the undersigned, hereby declare that we are qualified legal voters of
Election District of the Town of West New York, in which District we all reside, that we are members of the
DEMOCRATIC Party, and that we and each of us intend to affiliate with the said DEMOCRATIC Party at the ensuing
election, and that we and each of us hereby endorse:

Nosotros, los abajo firmantes, declaramos por la presente que somos votantes legalmente elegibles del
3 distrito electoral 1 distrito de la ciudad de West New York, en dicho distrito vivimos,
que somos miembros del Partido DEMOCRATA y que es nuestra intencion afiliarnos a dicho Partido DEMOCRATA
en las elecciones subsecuentes, y que apoyamos a:

NAME IN FULL
(Print)
NOMBRE COMPLETO
(Escriba en letras de molde)

RESIDENCE AND P.O. ADDRESS
(Print)
RESIDENCIA Y DIRECCION
(Escriba en letras de molde)

- 1. Claudia Blanco 6035 Boulevard East (A1) West New York, N.J.
2. Jose Ruben Mendoza 6035 Blvd East West New York, N.J. 07093

as candidates for nomination to the office of Members of the Hudson County DEMOCRATIC County Committee
of the Ward District of the Town of West New York, and we request that you print upon
the official Primary ballot of the DEMOCRATIC Party the names of the persons above herein mentioned, and we
heraby certify that they are legally qualified under the laws of this State to be nominated to said office and that
said persons so endorsed are members of the political party named in this petition.

como candidatos para la nominacion a los puestos de miembros del Comité del Condado DEMOCRATA del
Condado de Hudson del distrito electoral distrito de la ciudad de West New
York, y solicitamos que se ordene imprimir los nombres de las antedichas personas en la balota primaria oficial
del Partido DEMOCRATA y certificamos por la presente que ellos llenan los requisitos legales según las leyes
del Estado para ser nombrados para dichos puestos y además certificamos que dichas personas son miembros
del partido político estipulado en esta peticion.

Signature/Firma: Claudia Blanco
Residence address/Dirección: 6035 Blvd East A1

PRINT Name/Escriba el nombre en LETRAS DE MOLDE: Claudia Blanco
City/Ciudad: West New York

Signature/Firma: Jose Ruben Mendoza
Residence address/Dirección: 6035 Boulevard East A1

PRINT Name/Escriba el nombre en LETRAS DE MOLDE: Jose Ruben Mendoza
City/Ciudad: West New York N.J. 07093

3. SIGNATURE/FIRMA  
6035 Boulevard Exotique  
Residence address/Dirección

Jose P. Mendez -  
PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
West New York NJ 07093  
City/Ciudad

4. SIGNATURE/FIRMA  
Residence address/Dirección

Jose M. Alcantara  
PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
City/Ciudad

5. SIGNATURE/FIRMA  
Residence address/Dirección

PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
City/Ciudad

6. SIGNATURE/FIRMA  
Residence address/Dirección

PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
City/Ciudad

7. SIGNATURE/FIRMA  
Residence address/Dirección

PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
City/Ciudad

8. SIGNATURE/FIRMA  
Residence address/Dirección

PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
City/Ciudad

9. SIGNATURE/FIRMA  
Residence address/Dirección

PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
City/Ciudad

10. SIGNATURE/FIRMA  
Residence address/Dirección

PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
City/Ciudad

11. SIGNATURE/FIRMA  
Residence address/Dirección

PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
City/Ciudad

12. SIGNATURE/FIRMA  
Residence address/Dirección

PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
City/Ciudad

STATE OF NEW JERSEY }  
COUNTY OF HUDSON } s.s.

**Affidavit of Person Who Circulates This Petition and Witnesses Signatures**  
(To be signed by Circulator) (N.J.S.A. 19:23-11)

The witness taking the affidavit below must be the person who obtained the signatures on this petition. The circulator must take the affidavit for a petition before solicits and sign in the presence of a person authorized to administer affidavits (e.g. notary public).

STATE OF NEW JERSEY }  
COUNTY OF HUDSON } s.s.

I, Claudia Blanco of full age, being duly sworn or affirmed upon his/her oath depose and say that said petition is signed by each of the signers thereof in his/her own proper handwriting; that each of the signers is, to the best knowledge and belief of deponent, a legal voter of the Town of West New York,

Ward \_\_\_\_\_, District \_\_\_\_\_, in the County of Hudson of the State of New Jersey, as stated in said petition, and belongs to the political party named in said petition; and that such petition is prepared and filed in absolute good faith for the sole purpose of endorsing the person named therein in order to secure his/her nomination or selection as stated in said petition; and further affirm that I am a registered voter in the State of New Jersey, whose party affiliation is of the same political party named in the petition.

Declaración Jurada de la persona que Circula esta Petición y las Firmas de Testigos  
(Debe ser firmado por el Circulante) (N.J.S.A. 19:29-11)

El testigo que obtenga esta declaración jurada debe ser la misma persona que obtenga las firmas en esta petición. El circulante debe llevar la declaración jurada para que él/ella solicite una petición y firme en presencia de una persona autorizada que administre declaraciones juradas (por ejemplo un notario público).

ESTADO DE NUEVA JERSEY } s.s.  
CONDADO DE HUDSON }

Yo, \_\_\_\_\_, siendo mayor de edad, hablando declarado bajo juramento

Escrito en esta de modo el nombre del circulanteligo que declara que es uno de los firmantes de la antedicha petición; que la antedicha petición ha sido firmada por cada uno de los firmantes de su puño y letra; de acuerdo a su mejor conocimiento y creencias del deponente, votantes legales del Municipio de West New York, Distrito Electoral \_\_\_\_\_, Distrito \_\_\_\_\_, en el Condado de Hudson del Estado de Nueva Jersey, como se indica en dicha petición, y afiliado al partido político de dicha petición; y tal petición es preparada y presentada de buena fe con el único intención de apoyar a la persona nombrada como candidato/a con el fin de asegurar su nominación o elección como indica en dicha petición; yo afirmo además que soy un votante registrado en el Estado de Nueva Jersey, cuyo partido político es el mismo en esta petición.

Subscribed and sworn to this

1<sup>st</sup> day of April, 2018 at 6:55 PM



Jurado y declarado ante mí este \_\_\_\_\_ día de \_\_\_\_\_ de 20\_\_ en \_\_\_\_\_

Notary Public/Notario

One of the above 10 signers makes above oath and signs name here  
Uno de los 10 firmantes anteriores presta juramento y firma aquí  
PRINT NAME/ESCRIBA EL NOMBRE EN LETRAS DE MOLDE  
Jose Ramon Mendez

WRITE PLAIN AND FIRST NAME IN FULL

We hereby declare that we are legally qualified for the office of Members of the Hudson County Democratic County Committee mentioned in the foregoing petition, and we hereby consent to stand as candidates for said nomination at the ensuing Primary Election and if nominated we hereby agree to accept said nomination.

ESCRIBA CLARAMENTE EL NOMBRE COMPLETO

Nosotros declaramos por la presente que llenamos los requisitos legales para los puestos de Miembros del Comité del Condado Democrata del Condado de Hudson, como mencionado en la petición anterior, y consentimos por la presente en presentarnos como candidatos para dichas nominaciones en las elecciones primarias subsiguientes, y el seremos nominados, consentimos en aceptar dichas nominaciones.

NAME/NOMBRE	RESIDENCE AND P.O. ADDRESS/RESIDENCIA Y DIRECCIÓN
1. Signature/ Firma 6035 Boulevard East Apt B-1 Residence address/ Direccion	Claudia Blanco PRINT Name/ Escribe el nombre en LETRAS DE MOLDE West New York, NJ Ciudad Jose Ramon Mendez PRINT Name/ Escribe el nombre en LETRAS DE MOLDE West New York Ciudad
2. Signature/ Firma 6035 Boulevard East Apt B-1 Residence address/ Direccion	

WRITE PLAIN AND FIRST NAME IN FULL  
ESCRIBA CLARAMENTE EL NOMBRE COMPLETO

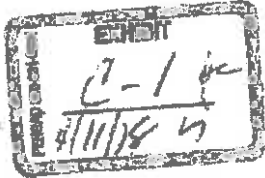
We, the above endorsed candidates for the office of Members of the Hudson County DEMOCRATIC County Committee, do hereby request you to group together and bracket our names, and to print opposite our names so bracketed, on the said Primary Ticket for the ensuing Primary Election, the following designation:

Nosotros, los antedichos candidatos apoyados para los puestos de Miembros del Comité del Condado DEMOCRATA del Condado de Hudson, pedimos por la presente que nuestros nombres sean colocados juntos entre corchetes y que se ordene imprimir la siguiente designación enfrente de nuestros nombres entre los corchetes en la balota primaria para las elecciones primarias subsiguientes:

(Not more than six words. No más que seis palabras)  
Hudson County Democratic Organization  
Signature/ Firma  
Claudia Blanco  
PRINT Name/ Escribe el nombre en LETRAS DE MOLDE

Signature/ Firma  
Jose Ramon Mendez  
PRINT Name/ Escribe el nombre en LETRAS DE MOLDE

Notice: All candidates are required by law to comply with the provisions of the "New Jersey Campaign Contributions and Expenditures Report Act". For further information, please call the Election Law Enforcement Commission 609-292-6700 or 888-913-0302.



AFFIDAVIT

STATE OF NEW JERSEY )  
  ) SS.  
COUNTY OF HUDSON )

*Andrea Blasco*, having been duly sworn according to law says:

1. In February 2018, I was approached by Jonathan Castaneda, who asked me to sign a nomination petition.
2. I know now that this was a petition for election to the West New York Democratic Municipal Committee. When Mr. Castaneda presented it to me, however, he misled me into believing that it was a petition for a different office.
3. In addition, when Mr. Castaneda asked me to sign the petition, which I did, there was no candidate names on the petition.
4. I have subsequently learned that the petition I signed was turned in on behalf of the Hudson County Democratic Organization and that a candidate name was added later. It was never my intent to support a Municipal Committee candidate running under the banner of the Hudson County Democratic Organization, and if I had known that that is what I was being asked to sign, I would not have signed it. The petition which I signed is for Election District Number   3-1  .
5. Not only am I asking that my name be removed from that petition, it is my belief that this pattern was followed with many if not all of the Municipal Committee petitions which were circulated by Mr. Castaneda.



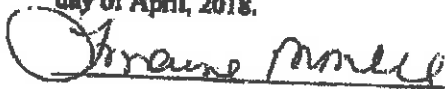
6. As a result of this widespread conduct, I am also requesting that all the petitions which Mr. Castaneda circulated should be rejected.



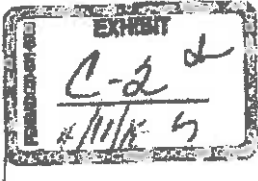
Sworn and Subscribed to

before me this <sup>14<sup>th</sup></sup> 14

day of April, 2018.



**LORRAINE STORRELL**  
**NOTARY PUBLIC OF NEW JERSEY**  
**I.D. # 2448768**  
**My Commission Expires 4/28/2019**



AFFIDAVIT

STATE OF NEW JERSEY )  
 ) SS.  
 COUNTY OF HUDSON )

Jose Rubin Mendoza, having been duly sworn according to law says:

1. In February 2018, I was approached by Jonathan Castaneda, who asked me to sign a nomination petition.
2. I know now that this was a petition for election to the West New York Democratic Municipal Committee. When Mr. Castaneda presented it to me, however, he misled me into believing that it was a petition for a different office.
3. In addition, when Mr. Castaneda asked me to sign the petition, which I did, there was no candidate name on the petition.
4. I have subsequently learned that the petition I signed was turned in on behalf of the Hudson County Democratic Organization and that a candidate name was added later. It was never my intent to support a Municipal Committee candidate running under the banner of the Hudson County Democratic Organization, and if I had known that that is what I was being asked to sign, I would not have signed it. The petition which I signed is for Election District Number 3-1.
5. Not only am I asking that my name be removed from that petition, it is my belief that this pattern was followed with many if not all of the Municipal Committee petitions which were circulated by Mr. Castaneda.

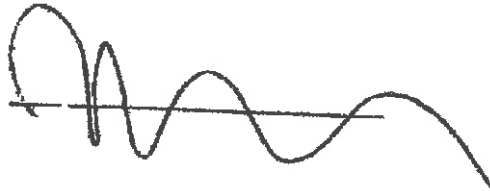
6. As a result of this widespread conduct, I am also requesting that all the petitions which Mr. Castaneda circulated should be rejected.

Sworn and Subscribed to

before me this 6<sup>th</sup>

day of April, 2018.

Lorraine Morrell



**LORRAINE MORRELL**  
**NOTARY PUBLIC OF NEW JERSEY**  
**I.D. # 2443761**  
**My Commission Expires 4/22/2019**



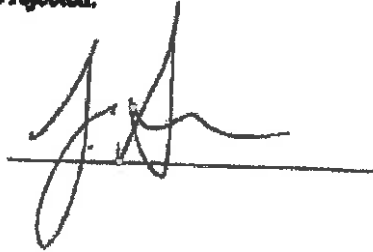
AFFIDAVIT

STATE OF NEW JERSEY )  
  ) SS.  
COUNTY OF HUDSON )

Jose M Alcantara, having been duly sworn according to law says:

1. In February 2018, I was approached by Jonathan Castaneda, who asked me to sign a nomination petition.
2. I know now that this was a petition for election to the West New York Democratic Municipal Committee. When Mr. Castaneda presented it to me, however, he misled me into believing that it was a petition for a different office.
3. In addition, when Mr. Castaneda asked me to sign the petition, which I did, there was no candidate name on the petition.
4. I have subsequently learned that the petition I signed was turned in on behalf of the Hudson County Democratic Organization and that a candidate name was added later. It was never my intent to support a Municipal Committee candidate running under the banner of the Hudson County Democratic Organization, and if I had known that that is what I was being asked to sign, I would not have signed it. The petition which I signed is for Election District Number 3-1.
5. Not only am I asking that my name be removed from that petition, it is my belief that this pattern was followed with many if not all of the Municipal Committee petitions which were circulated by Mr. Castaneda.

6. As a result of this widespread conduct, I am also requesting that all the petitions which Mr. Castaneda circulated should be rejected.

A handwritten signature in black ink, appearing to be 'J. Castaneda', written over a horizontal line.

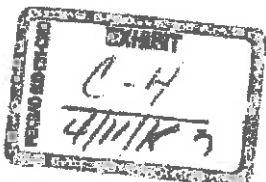
Sworn and Subscribed to

before me this 6<sup>th</sup>

day of April, 2018.

A handwritten signature in black ink, appearing to be 'Lorraine Morrell', written over a horizontal line.

**LORRAINE MORRELL**  
**NOTARY PUBLIC OF NEW JERSEY**  
**I.D. # 2446768**  
**My Commission Expires 4/20/2019**

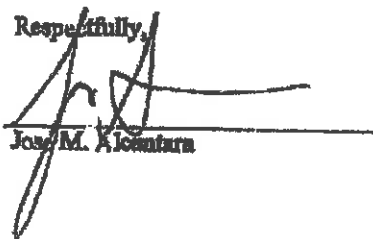


4/5/2018

Dear Town Clerk Riccio,

I am here by withdrawing my signature from the County Committee Petition for committee women/ or committee man of Ward 3 District 1 which was submitted on April 2, 2018 by Cosmo Cirillo, again please withdraw from this petition immediately

Respectfully,

  
Jose M. Xicautera

RECEIVED  
2018 APR -5 A 10:29  
TOWN CLERK'S OFFICE  
WEST NEW YORK, N.J.



4/5/18

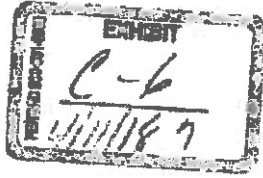
Dear Town Clerk Riccio,

I am here by withdrawing my signature from the County Committee Petition for committee man/ committee woman of Ward 5 District 1 which was submitted on April 2, 2018 by Cosmo Cirillo, again please withdraw my signature from this petition immediately.

Respectfully,

*[Handwritten signature]*  
Claudia Blanco

RECEIVED  
2018 APR -5 P 4: 20  
TOWN CLERK'S OFFICE  
WEST NEW YORK, N.J.



4/5/18

Dear Town Clerk Riccio,

I am here by withdrawing my signature from the County Committee Petition for committee man/ committee woman of Ward 3 District 1 which was submitted on April 2, 2018 by Cosmo Cirillo, again please withdraw my signature from this petition immediately.

Respectfully,

A handwritten signature in black ink, consisting of a large loop followed by several smaller loops and a long horizontal stroke. Below the signature is a horizontal line.

Jose Ruben Mendoza

RECEIVED  
2018 APR -5 P 1:26  
TOWN CLERK'S OFFICE  
WEST NEW YORK, N.J.





**ANTONELLI KANTOR, P.C.**  
1000 Stuyvesant Avenue  
Suits #1  
Union, New Jersey 07083  
Tel.: 908-623-3676  
Fax: 908-866-0336  
Daniel Antonelli - (00684-1997)  
Charles Simmons - (10020-2014)  
Attorneys for Carmela Riccio,  
West New York's Town Clerk

IN THE MATTER OF OBJECTIONS TO  
PETITIONS FILED BY CANDIDATES  
RUNNING FOR WEST NEW YORK  
DEMOCRATIC MUNICIPAL  
COMMITTEE UNDER THE SLOGAN  
"HUDSON COUNTY DEMOCRATIC  
ORGANIZATION.

STATE OF NEW JERSEY, HUDSON  
COUNTY, TOWN OF WEST NEW YORK,  
TOWN CLERK'S OFFICE

**SUBPOENA AD TESTIFICANDUM**

**THE STATE OF NEW JERSEY, TO:**

Jonathan Castaneda  
6511 Madison Street, Apt. 3  
West New York, New Jersey 07093

**YOU ARE HEREBY COMMANDED** to attend and give testimony in the above  
referenced matter, at West New York Town Clerk's Office, Room 2, Municipal Building, 428-60<sup>th</sup>  
Street, West New York, New Jersey 07093, on April 11, 2018 at 10:30 a.m. and once there, to  
testify as a witness in the above captioned matter.

Failure to appear or comply according to the command of this Subpoena will subject you  
to a penalty, damages in a Civil Suit and punishment for contempt of Court.

**ANTONELLI KANTOR, P.C.**  
Attorneys for Carmela Riccio,  
West New York's Town Clerk

*[Handwritten signature of Daniel Antonelli]*  
**DANIEL ANTONELLI**

/s/ Michelle M. Smith  
Michelle M. Smith, Esq.  
Clerk, Superior Court of New Jersey

Dated: April 10, 2018

**ANTONELLI KANTOR P.C.**  
**ATTORNEYS AT LAW**

**DANIEL ANTONELLI\***  
*PARTNER*  
**JARRID H. KANTOR\***  
*PARTNER*  
**YULEIKA TAMAYO\***  
*ASSOCIATE*  
**JEREMY V. FUCCE**  
*ASSOCIATE*  
**LEONARD V. JONES\***  
*ASSOCIATE*  
**CHARLES R. G. SIMMONS\***  
*ASSOCIATE*  
  
*\*ADMITTED NJ & NY*

1000 STUYVESANT AVE  
SUITE #1  
UNION, NJ 07088  
Main: (908) 628-8676  
Fax: (908) 866-0836  
www.aknjlaw.com

*WRITER'S CONTACT:*  
Direct: 908-628-8672  
Email: dantonelli@aknjlaw.com

April 10, 2018

Via Guaranteed Subpoena  
Jonathan Castaneda  
6511 Madison Street, Apt. 3  
West New York, New Jersey 07093

**Re: Hearing on Objections to Petitions Filed by Candidates Running for West  
New York Democratic Municipal Committee Under the Slogan "Hudson  
County Democratic Organization"**

Dear Mr. Castaneda:

This firm represents Carmela Riccio, West New York's Town Clerk in the above-referenced matter. In that connection, enclosed for service is a *Subpoena Ad Testificandum* requiring you to appear and give testimony at the West New York Town Clerk's Office on April 11, 2018, at 10:30 a.m.

If you have any questions, please feel free to contact me to discuss.

Very truly yours,

Daniel Antonelli

DA/cs  
Encl.  
cc: Carmela Riccio (via email)

Fax Server

4/11/2018 9:26:48 AM PAGE 1/001 Fax Server



Guaranteed Subpoena Service, Inc.  
P.O. Box 2248 - UNION, NJ 07083  
Phone: (908) 687-0056 Toll free: (800) 672-1952  
Fax: (908) 688-0886 Tax ID 22-2363485  
Web: www.Served.com - Email: Info@Served.com

Your Process 20180410120108 Has Been  
SUCCESSFULLY SERVED!

Served Upon: JONATHAN CASTANEDA  
Served Date/Time: 4/10/2018 6:58:34 PM  
Service Type: PERSONALLY DELIVERING A COPY  
Accepted By: JONATHAN CASTANEDA  
Relationship/Title: SELF  
Description: Sex: M Age: 21-35 Height: 5'9"-6'0" Weight: OVER 200 LBS.  
Skin: WHITE Hair: BLACK Other: GLASSES

Location: HOME  
At Same Address: 6511 MADISON STREET, APT. 3  
WEST NEW YORK NJ 07093

In the Case/Docket: N/A Claim:  
Plaintiff: IN THE MATTER OF OBJECTION TO PETITIONS FILED BY CANDIDATES  
RUNNING FOR WEST NEW YORK DEMOCRATIC MUNICIPAL COMMITTEE  
UNDER THE SLOGAN "HUDSON COUNTY DEMOCRATIC ORGANIZATION"  
Defendant: N/A  
Attorney: JARRID H. KANTOR, ESQ.  
Phone/Fax/Email: 9083233676 9083680336 JKANTOR@AKNJLAW.COM  
Firm: ANTONELLI KANTOR, PC.  
1000 STUYVESANT AVENUE SUITE 1  
UNION NJ 07093

The proof of service, the affidavit of process server or the acknowledgement of service will be arriving  
by first class mail in the next few days.

[www.SERVED.com](http://www.SERVED.com)

Visit us on the web to get the latest status of your process, request services, make a payment and  
more!

Your firm ID is: AN094850

**ARE WE FILING THIS AFFIDAVIT  
IN ACCORDANCE WITH RULE 4:4-7?  
WE WILL DO IT AUTOMATICALLY FOR \$9.99.  
CALL TO MAKE ARRANGEMENTS.**

**CARMELA RICCIE**

**From:** Jonathan Castaneda <jonathanfcastaneda@gmail.com>  
**Sent:** Wednesday, April 11, 2018 9:22 AM  
**To:** CARMELA RICCIE  
**Subject:** Subpoena 4/11



Good Morning Carmela,

Please be advised that I received a subpoena last evening, (dated Tuesday, April 10, 2018) at 7:00PM to appear before you this morning, Wednesday, April 11, 2018 at 10:30AM.

This subpoena was handed to me only hours before a hearing, and I am not available on such unreasonably short notice. I received this notice late in the evening well after business hours were over, and I do not feel comfortable with this.

I will not be attending this morning to serve as a witness, as I need an opportunity to speak with legal counsel before appearing for a subpoena.

Thank you for your attention.

--  
Sincerely

Jonathan Castaneda

**AFFIDAVIT**

STATE OF NEW JERSEY )  
                                  ) SS.  
COUNTY OF HUDSON )

I, Bonnie Rodriguez of full age, certifies as follows:

- 1. I signed a petition in support of Bonnie Rodriguez and Joseph F. Rodriguez to appear on the June 2018 ballot for the office of West New York Democratic Municipal Committee in Ward 3 District 1.
- 2. These candidates' names were clearly on the petition that I signed, and I was fully aware of the office for which they were running. I was not deceived into signing this petition in any way.
- 3. I stand by my signature on this petition and continue to request that these candidates appear on the ballot in the June 2018 Democratic Primary Election.
- 4. Due to obligations, I am unable to appear at the April 11, 2018 hearing on short notice but would be prepared to do so if this proceeds further.

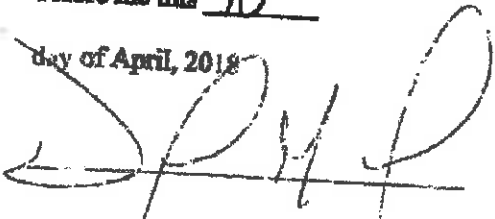
I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Bonnie Rodriguez

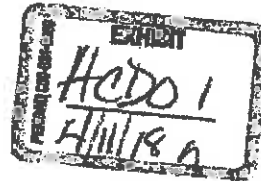
Sworn and Subscribed to

before me this 10<sup>th</sup>

day of April, 2018



DAVID MORRIS  
NEWLY COMMISSIONED  
STATE OF NEW JERSEY  
BY COMMISSIONER OF STATE ARCHIVES 4/17/18



AFFIDAVIT

STATE OF NEW JERSEY )  
 ) SS.  
COUNTY OF HUDSON )

I, Glenn Rodriguez of full age, certifies as follows:

1. I signed a petition in support of Bonnie Rodriguez and Joseph F. Rodriguez to appear on the June 2018 ballot for the office of West New York Democratic Municipal Committee in Ward 3 District 1.

2. These candidates' names were clearly on the petition that I signed, and I was fully aware of the office for which they were running. I was not deceived into signing this petition in any way.

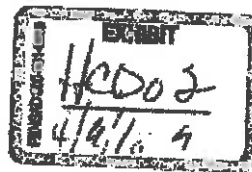
3. I stand by my signature on this petition and continue to request that these candidates appear on the ballot in the June 2018 Democratic Primary Election.

4. Due to obligations, I am unable to appear at the April 11, 2018 hearing on short notice but would be prepared to do so if this proceeds further.

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.

Sworn and Subscribed to  
before me this 10<sup>th</sup>  
day of April, 2018

NOTARY PUBLIC  
STATE OF NEW JERSEY  
EXPIRES 04/30/2019



**AFFIDAVIT**

STATE OF NEW JERSEY )  
  ) SS.  
COUNTY OF HUDSON )

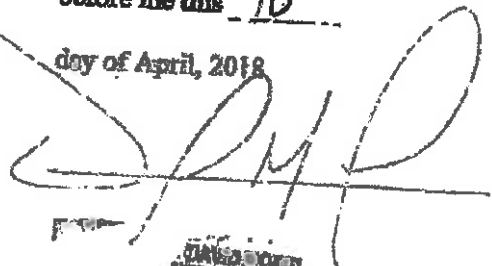
I, SONIA VARGAS of full age, certifies as follows:

1. I signed a petition in support of Bonnie Rodriguez and Joseph F. Rodriguez to appear on the June 2018 ballot for the office of West New York Democratic Municipal Committee in Ward 3 District 1.
2. These candidates' names were clearly on the petition that I signed, and I was fully aware of the office for which they were running. I was not deceived into signing this petition in any way.
3. I stand by my signature on this petition and continue to request that these candidates appear on the ballot in the June 2018 Democratic Primary Election.
4. Due to obligations, I am unable to appear at the April 11, 2018 hearing on short notice but would be prepared to do so if this proceeds further.

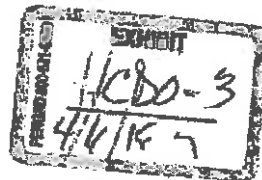
I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Sonia Vargas

Sworn and Subscribed to  
before me this 10<sup>th</sup>  
day of April, 2018



STATE OF NEW JERSEY  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
NOTARY PUBLIC  
19



Albero



# Schwartz • Edelstein

LAW GROUP LLC

100 South Jefferson Road • Suite 200 • Whippany, New Jersey 07981 • Tel: 973.301.0001 • Fax: 973.993.3152  
www.selawgroup.com

Please Reply to Whippany Office

April 6, 2018

RECEIVED  
2018 APR -6 P 3 58  
TOWN CLERK'S OFFICE  
WEST NEW YORK, N.J.

Stephen J. Edelstein  
selstein@selawgroup.com

**Hand Delivered**  
Carmela Riccio, Town Clerk  
Town of West New York  
Town Hall  
428-60<sup>th</sup> Street  
West New York, NJ 07093

**RE: West New York Democratic Municipal Committee**

Dear Ms. Riccio:

This office represents the candidates for West New York Democratic Municipal Committee who are running using the slogan Democrats for Hudson County.

Please accept this letter as an objection on behalf of those candidates to the petitions for West New York Democratic Municipal Committee filed by Cosmo Cirillo on behalf of all candidates using the slogan Hudson County Democratic Organization.

The basis for this objection is that the petitions to which we object were circulated without candidate names, which were added later, after the nominating signatures were obtained. In addition, the circulator of the petitions, Mr. Jonathan Castaneda, misled signers into believing that the petitions were for a different office.

South Jersey Office  
Twin Ponds  
Executive Campus  
600 Birchfield Drive  
Suite 603-A  
Mt. Laurel, NJ  
08054  
973.301.0001

New York Office  
415 Madison Avenue  
16th Floor  
New York, New York  
10017  
212.752.5258



(80779287; 1)



Carmela Riccio, Town Clerk  
April 6, 2018  
Page 2

In support of these contentions, I am enclosing Affidavits which verify these facts. Due to time constraints, these are a representative sampling of what we believe is universally the case.

Under the circumstances, we ask that you conduct whatever investigation you deem appropriate and then invalidate the challenged petitions in their entirety.

All of the objectors are registered voters of the Municipality of West New York.

Very truly yours,

Schwartz & Edelstein Law Group LLC



STEPHEN J. EDELSTEIN  
A Member Of The Firm

SJE/sj

 Schwartz & Edelstein  
LAW GROUP

(00779287; 1)

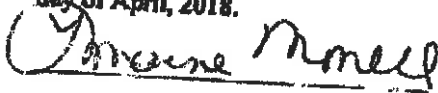


6. As a result of this widespread conduct, I am also requesting that all the petitions which Mr. Castaneda circulated should be rejected.



Sworn and Subscribed to  
before me this 12<sup>th</sup>

day of April, 2018.



**LORRAINE MORRELL**  
**NOTARY PUBLIC OF NEW JERSEY**  
**I.D. # 2448769**  
**My Commission Expires 4/30/2019**

# Town of West New York Ciudad de West New York

Names and Addresses Must Be Plainly Written and Printed  
**WRITE FIRST NAME IN FULL**  
Los nombres y las direcciones deben ser escritos claramente en letras de molde.  
**ESCRIBA EL NOMBRE DE PILA COMPLETO.**



Primary Petition for Members of the Hudson County DEMOCRATIC  
County Committee

Peticion Primaria para los Miembros del Comité del Condado  
DEMOCRATA del Condado de Hudson

2

WARD/DISTRITO ELECTORAL

DISTRICT/DISTRITO

TO/A: CARMELA RICCIE  
Town Clerk/Secretaría Municipal

RECEIVED  
MAY 28 - 2 A 9 12  
MAY 28 2018  
WEST NEW YORK, N.J.

Ward 7

We, the undersigned, hereby declare that we are qualified legal voters of Election District of the Town of West New York, in which District we all reside, that we are members of the DEMOCRATIC Party, and that we and each of us intend to affiliate with the said DEMOCRATIC Party at the ensuing election, and that we and each of us hereby endorse:

Nosotros, los abajo firmantes, declaramos por la presente que somos votantes legalmente elegibles del distrito electoral distrito de la ciudad de West New York, en dicho distrito vivimos, que somos miembros del Partido DEMOCRATA y que es nuestra intención afiliarnos a dicho Partido DEMOCRATA en las elecciones subsiguientes, y que apoyamos a:

NAME IN FULL  
(Print)  
NOMBRE COMPLETO  
(Escriba en letras de molde)

RESIDENCE AND P.O. ADDRESS  
(Print)  
RESIDENCIA Y DIRECCION  
(Escriba en letras de molde)

- Patricia Delgado 6019 Tyler Pl #2WNJ
- Jorge Delgado 6019 Tyler Pl #2WNJ

as candidates for nomination to the office of Members of the Hudson County DEMOCRATIC County Committee of the Ward District of the Town of West New York, and we request that you print upon the official Primary ballot of the DEMOCRATIC Party the names of the persons above herein mentioned, and we hereby certify that they are legally qualified under the laws of this State to be nominated to said office and that said persons so endorsed are members of the political party named in this petition.

como candidatos para la nominación a los puestos de miembros del Comité del Condado DEMOCRATA del Condado de Hudson del distrito electoral distrito de la ciudad de West New York, y solicitamos que se ordene imprimir los nombres de las antedichas personas en la balota primaria oficial del Partido DEMOCRATA y certificamos por la presente que ellos llenan los requisitos legales según las leyes del Estado para ser nombrados para dichos puestos y además certificamos que dichas personas son miembros del partido político estipulado en esta petición.

1. Patricia Delgado  
SIGNATURE/FIRMA  
6019 Tyler Pl #2  
Residence address/Dirección

Patricia Delgado  
PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
West New York  
City/Ciudad

2. Jorge Delgado  
SIGNATURE/FIRMA  
6019 Tyler Pl #2  
Residence address/Dirección

Jorge Delgado  
PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
West New York  
City/Ciudad

3. [Signature]  
SIGNATURE/FIRMA

6512 Harrison Place  
Residence address/Dirección

Kyle Jameson  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE

West New York  
City/Ciudad

4. [Signature]  
SIGNATURE/FIRMA

6012 Harrison Place  
Residence address/Dirección

Kerry Jameson  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE

West New York  
City/Ciudad

5. [Signature]  
SIGNATURE/FIRMA

6012 Harrison Pl.  
Residence address/Dirección

Patricia Jameson  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE

West New York  
City/Ciudad

6. [Signature]  
SIGNATURE/FIRMA

6012 Harrison Pl.  
Residence address/Dirección

Robert C Jameson  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE

West New York  
City/Ciudad

7. [Signature]  
SIGNATURE/FIRMA

6019 Tyler Pl.  
Residence address/Dirección

Charlie Calderin  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE

West New York  
City/Ciudad

8. [Signature]  
SIGNATURE/FIRMA

6014 Tyler Pl.  
Residence address/Dirección

Jessee Calderin  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE

West New York  
City/Ciudad

9. [Signature]  
SIGNATURE/FIRMA

6019 Tyler Pl.  
Residence address/Dirección

Olivia Lopez  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE

West New York  
City/Ciudad

10. [Signature]  
SIGNATURE/FIRMA

6027 Tyler Pl.  
Residence address/Dirección

Alberto Fernandez  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE

West New York  
City/Ciudad

11. [Signature]  
SIGNATURE/FIRMA

6027 Tyler Pl.  
Residence address/Dirección

Marlon Fernandez  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE

West New York  
City/Ciudad

12. [Signature]  
SIGNATURE/FIRMA

6027 Tyler Pl.  
Residence address/Dirección

Angela Fernandez  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE

West New York  
City/Ciudad

STATE OF NEW JERSEY  
COUNTY OF HUDSON } s.s.  
I, Jorge Delgado J.D. 4-5-18

Affidavit of Person Who Circulates This Petition and Witnesses Signatures  
(To be signed by Circulator) (N.J.S.A. 19:28-11)

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

STATE OF NEW JERSEY  
COUNTY OF HUDSON } s.s.

1. Jorge Delgado JD-4-5-18 of full age, being duly sworn or affirmed upon his/her oath depose and say that said petition is signed by each of the signers thereof in his/her own proper handwriting; that each of the signers is, to the best knowledge and belief of deponent, a legal voter of the Town of West New York,

Ward 2, District 2, in the County of Hudson of the State of New Jersey, as stated in said petition, and belongs to the political party named in said petition; and that such petition is prepared and filed in absolute good faith for the sole purpose of endorsing the person named therein in order to secure his/her nomination or election as stated in said petition; and further affirm that I am a registered voter in the State of New Jersey, whose party affiliation is of the same political party named in the petition.

Declaración Jurada de la personería que Circula esta Petición y las Firmas de Testigos (Debe ser firmada por el Circulante) (N.J.S.A. 19-23-11)

El testigo que obtenga esta declaración jurada debe ser la misma persona que obtenga las firmas en esta petición. El circulante debe llevar la declaración jurada para que él/ella solicite una petición y firme en presencia de una persona autorizada que administre declaraciones juradas (por ejemplo un notario público).

ESTADO DE NUEVA JERSEY } s.s.  
CONDADO DE HUDSON }

Yo, Escoba en letra de molde el nombre del circulante/testigo siendo mayor de edad, habiendo declarado bajo juramento que declaro que es uno de los firmantes de la antedicha petición; que la antedicha petición ha sido firmada por cada uno de los firmantes de su puño y letra; de acuerdo a su mejor conocimiento y creencias del deponente, votante legal del Municipio de West New York, Distrito Electoral         , Distrito         , en el Condado de Hudson del Estado de Nueva Jersey, como se indica en dicha petición, y afiliado al partido político de dicha petición; y tal petición es preparada y presentada de buena fe con el única intención de apoyar a la persona nombrada como candidato/a con el fin de asegurar su nominación o elección como indica en dicha petición; yo afirmo además que soy un votante registrado en el Estado de Nueva Jersey, cuyo partido político es el mismo en esta petición.

Subscribed and sworn to this 1<sup>st</sup> day of April, 2018 at West New York before me

Jurado y declarado ante mí este          día de          de 20          en         

*[Signature]*  
Notary Public/Notario

*[Signature]*  
One of the above 10 signers makes above oath and signs name here  
Uno de los 10 firmantes antedichos presta juramento y firma aquí  
Jorge L. Delgado

PRINT NAME/ESCRIBA EL NOMBRE EN LETRAS DE MOLDE

WRITE PLAIN AND FIRST NAME IN FULL

We hereby declare that we are legally qualified for the office of Members of the Hudson County Democratic County Committee mentioned in the foregoing petition, and we hereby consent to stand as candidates for said nomination at the ensuing Primary Election and if nominated we hereby agree to accept said nomination.

ESCRIBA CLARAMENTE EL NOMBRE COMPLETO

Nosotros declaramos por la presente que llenamos los requisitos legales para los puestos de Miembros del Comité del Condado Democrata del Condado de Hudson, como mencionado en la petición anterior, y consentimos por la presente en presentarnos como candidatos para dichas nominaciones en las elecciones primarias subsecuentes, y el asientos nominados, consentimos en aceptar dichas nominaciones.

- |  |   |
|--|---|
| 1. <u><i>[Signature]</i></u><br>SIGNATURE/FIRMA<br><u>6019 Tula Place Apt 2</u><br>Residencia address/Residencia | <u><i>[Signature]</i></u><br>RESIDENCE AND P.O. ADDRESS/RESIDENCIA Y DIRECCIÓN<br><u>Patricia Delgado</u><br>PRINT Name/Escriba el nombre en LETRAS DE MOLDE<br><u>WNY</u><br>City/Ciudad |
| 2. <u><i>[Signature]</i></u><br>SIGNATURE/FIRMA<br><u>6019 Tula Place Apt 2</u><br>Residencia address/Residencia | <u><i>[Signature]</i></u><br>RESIDENCE AND P.O. ADDRESS/RESIDENCIA Y DIRECCIÓN<br><u>Jorge L. Delgado</u><br>PRINT Name/Escriba el nombre en LETRAS DE MOLDE<br><u>WNY</u><br>City/Ciudad |

WRITE PLAIN AND FIRST NAME IN FULL  
ESCRIBA CLARAMENTE EL NOMBRE COMPLETO

We, the above endorsed candidates for the office of Members of the Hudson County DEMOCRATIC County Committee, do hereby request you to group together and bracket our names, and to print opposite our names so bracketed, on the said Primary Ticket for the ensuing Primary Election, the following designation:

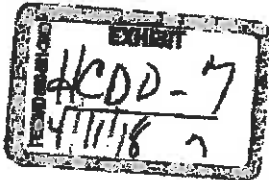
Nosotros, los antedichos candidatos apoyados para los puestos de Miembros del Comité del Condado DEMOCRATA del Condado de Hudson, pedimos por la presente que nuestros nombres sean colocados juntos entre corchetes y que se ordene imprimir la siguiente designación enfrente de nuestros nombres entre los corchetes en la balota primaria para las elecciones primarias subsecuentes:

Hudson County Democratic Organization  
(Not more than six names; no más que seis nombres)  
*[Signature]* SIGNATURE/FIRMA  
Patricia Delgado PRINT Name/ Escriba el nombre en LETRAS DE MOLDE  
*[Signature]* SIGNATURE/FIRMA  
Jorge L. Delgado PRINT Name/ Escriba el nombre en LETRAS DE MOLDE

Notice: All candidates are required by law to comply with the provisions of the "New Jersey Campaign Contributions and Expenditures Report Act". For further information, please call the Election Law Enforcement Commission 908-292-6700 or 800-915-3532.

Town of West New York  
Ciudad de West New York

Names and Addresses Must Be Plainly Written and Printed  
WRITE FIRST NAME IN FULL  
Los nombres y las direcciones deben ser escritos claramente en letras de molde.  
ESCRIBA EL NOMBRE DE PILA COMPLETO.



Primary Petition for Members of the Hudson County DEMOCRATIC County Committee

Peticion Primaria para los Miembros del Comité del Condado DEMOCRATA del Condado de Hudson

2  
WARD/DISTRITO ELECTORAL

RECEIVED  
MAY APR 12 P 2 34  
TOWN CLERK'S OFFICE  
WEST NEW YORK, N.J.  
7  
Ward 5

TO/A: CARMELA RICCIE  
Town Clerk/Secretaria Municipal

We, the undersigned, hereby declare that we are qualified legal voters of Election District of the Town of West New York, in which District we all reside, that we are members of the DEMOCRATIC Party, and that we and each of us intend to affiliate with the said DEMOCRATIC Party at the ensuing election, and that we and each of us hereby endorse:

Nosotros, los abajo firmantes, declaramos por la presente que somos votantes legalmente elegibles del distrito electoral distrito de la ciudad de West New York, en dicho distrito vivimos, que somos miembros del Partido DEMOCRATA y que es nuestra intención afiliarnos a dicho Partido DEMOCRATA en las elecciones subsiguientes, y que apoyamos a:

NAME IN FULL  
(Print)  
NOMBRE COMPLETO  
(Escriba en letras de molde)

RESIDENCE AND P.O. ADDRESS  
(Print)  
RESIDENCIA Y DIRECCION  
(Escriba en letras de molde)

1. Juanne Arroyo, 405 - 58<sup>th</sup> Street, Apt 6, West New York, NJ 07093
2. Albino Rangel, 409 - 58<sup>th</sup> Street, Apt 03, West New York, NJ 07093

as candidates for nomination to the office of Members of the Hudson County DEMOCRATIC County Committee of the Ward District of the Town of West New York, and we request that you print upon the official Primary ballot of the DEMOCRATIC Party the names of the persons above herein mentioned, and we hereby certify that they are legally qualified under the laws of this State to be nominated to said office and that said persons so endorsed are members of the political party named in this petition.

como candidatos para la nominación a los puestos de miembros del Comité del Condado DEMOCRATA del Condado de Hudson del distrito electoral distrito de la ciudad de West New York, y solicitamos que se ordene imprimir los nombres de las antedichas personas en la balota primaria oficial del Partido DEMOCRATA y certificamos por la presente que ellos llenan los requisitos legales según las leyes del Estado para ser nombrados para dichos puestos y además certificamos que dichas personas son miembros del partido político estipulado en esta petición.

1. Juanne Arroyo  
SIGNATURE/FIRMA  
405 - 58<sup>th</sup> Street, Apt 6.  
Residence address/Dirección

Juanne Arroyo  
PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
West New York  
City/Ciudad

2. Albino Rangel  
SIGNATURE/FIRMA  
409 - 58<sup>th</sup> Street, Apt 03  
Residence address/Dirección

Albino Rangel  
PRINT Name/Escriba el nombre en LETRAS DE MOLDE  
West New York  
City/Ciudad

3. [Signature]  
SIGNATURE/FIRMA

301-53rd Apt. B-4  
Residence address/Dirección

4. [Signature]  
SIGNATURE/FIRMA

413 59th St. Apt. 1  
Residence address/Dirección

5. [Signature]  
SIGNATURE/FIRMA

413 59th Street Apt 1  
Residence address/Dirección

6. [Signature]  
SIGNATURE/FIRMA

5705 Palisade Ave. Apt. 2  
Residence address/Dirección

7. [Signature]  
SIGNATURE/FIRMA

5705 Palisade Ave. Apt. #2  
Residence address/Dirección

8. [Signature]  
SIGNATURE/FIRMA

405 58th Apt 4 WINDY APT#4  
Residence address/Dirección

9. [Signature]  
SIGNATURE/FIRMA

6024 Harrison Pl. Apt 201  
Residence address/Dirección

10. [Signature]  
SIGNATURE/FIRMA

413-59TH STREET Apt. 1 WEST NEW YORK  
Residence address/Dirección

11. \_\_\_\_\_  
SIGNATURE/FIRMA

Residence address/Dirección

12. \_\_\_\_\_  
SIGNATURE/FIRMA

Residence address/Dirección

Soraya Castillo  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE  
West New York, NJ 07093  
City/Ciudad

Lina Estrada  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE  
West New York, NJ 07093  
City/Ciudad

JOIGE Estrada  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE  
West New York, NJ 07093  
City/Ciudad

Miguel J. CARRERA  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE  
West New York, N.J. 07093  
City/Ciudad

Gloria E. Carrera  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE  
West New York, NJ 07093  
City/Ciudad

Jennifer Rojas  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE  
West New York  
City/Ciudad

Carmen Sofia Abarado  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE  
West New York  
City/Ciudad

DANIEL ESTRADA  
PRINT Name/Escribe el nombre en LETRAS DE MOLDE  
WEST NEW YORK, NJ  
City/Ciudad

PRINT Name/Escribe el nombre en LETRAS DE MOLDE  
City/Ciudad

PRINT Name/Escribe el nombre en LETRAS DE MOLDE  
City/Ciudad

STATE OF NEW JERSEY }  
COUNTY OF HUDSON } s.s.

Albeiro Ramos N.J. 04/03/18

Affidavit of Person Who Circulates This Petition and Witnesses Signatures  
(To be signed by Circulator) (N.J.S.A. 18:23-11)

The witness taking the affidavit below must be the person who obtained the signatures on this petition. The circulator must take the affidavit for a petition holder's affidavit and sign in the presence of a person authorized to administer affidavits (e.g. notary public).

STATE OF NEW JERSEY }  
COUNTY OF HUDSON } s.s.

1. Albeiro Ramos, of full age, being duly sworn or affirmed upon his/her oath, deposes and says that said petition is signed by each of the signers thereof in his/her own proper handwriting; that each of the signers is, to the best knowledge and belief of deponent, a legal voter of the Town of West New York,



Ward 2, District 7, in the County of Hudson of the State of New Jersey, as stated in said petition, and belongs to the political party named in said petition; and that such petition is prepared and filed in absolute good faith for the sole purpose of endorsing the person named therein in order to secure his/her nomination or selection as stated in said petition; and further affirm that I am a registered voter in the State of New Jersey, whose party affiliation is of the same political party named in the petition.

Declaración Jurada de la persona que Circula esta Petición y las Firmas de Testigos (Debe ser firmado por el Circulante) (N.J.S.A. 19:23-11)

El testigo que obtenga esta declaración jurada debe ser la misma persona que obtenga las firmas en esta petición. El circulante debe llevar la declaración jurada para que él/ella solicite una petición y firme en presencia de una persona autorizada que administre declaraciones juradas (por ejemplo un notario público).

ESTADO DE NUEVA JERSEY } s.s.  
CONDADO DE HUDSON }

Yo, Alberto Ruzgan, siendo mayor de edad, habiendo declarado bajo juramento que declaro que es uno de los firmantes de la antedicha petición; que la antedicha petición ha sido firmada por cada uno de los firmantes de su puño y letra; de acuerdo a su mejor conocimiento y creencias del deponente, votante legal del Municipio de West New York, Distrito Electoral 7, Distrito 7 en el Condado de Hudson del Estado de Nueva Jersey, como se indica en dicha petición, y afiliado al partido político de dicha petición; y tal petición es preparada y presentada de buena fe con el único intención de apoyar a la persona nominada como candidato/a con el fin de asegurar su nominación o elección como indica en dicha petición; yo afirmo además que soy un votante registrado en el Estado de Nueva Jersey, cuyo partido político es Democrático en esta petición.

Subscribed and sworn to this 14 day of February, 2018 at Livingston before me

Jurado y declarado ante mí este 14 día de Febrero de 2018 en Livingston

Jonathan Castañeda  
Notary Public/Notario  
JONATHAN CASTAÑEDA  
NOTARY PUBLIC OF NEW JERSEY  
Comm. # 80087008

One of the above 10 signers makes above oath and signs names here  
Uno de los 10 firmantes anteriores presta juramento y firma aquí

Alberto Ruzgan  
PRINT NAME/ESCRIBA EL NOMBRE EN LETRAS DE MOLDE  
WRITE PLAIN AND FIRST NAME IN FULL

We, the undersigned, are legally qualified for the office of Members of the Hudson County Democratic County Committee mentioned in the foregoing petition, and we hereby consent to stand as candidates for said nomination at the ensuing Primary Election and if nominated we hereby agree to accept said nomination.

ESCRIBA CLARAMENTE EL NOMBRE COMPLETO

Nosotros declaramos por la presente que llenamos los requisitos legales para los puestos de Miembros del Comité del Condado Democrático del Condado de Hudson, como mencionado en la petición anterior, y consentimos por la presente en presentarnos como candidatos para dichos nominaciones en las elecciones primarias subsiguientes, y si somos nominados, consentimos en aceptar dichas nominaciones.

1. Arriue Arroyo  
SIGNATURE/FIRMA  
RESIDENCE AND P.O. ADDRESS/DIRECCIÓN  
105-57th Street Apt 6  
Residencia/Dirección

Arriue Arroyo  
RESIDENCE AND P.O. ADDRESS/DIRECCIÓN  
West New York  
City/Ciudad

2. Alberto Ruzgan  
SIGNATURE/FIRMA  
RESIDENCE AND P.O. ADDRESS/DIRECCIÓN  
449-58th Street Apt. 03  
Residencia/Dirección

Alberto Ruzgan  
RESIDENCE AND P.O. ADDRESS/DIRECCIÓN  
West New York  
City/Ciudad

ESCRIBA CLARAMENTE EL NOMBRE COMPLETO

We, the above endorsed candidates for the office of Members of the Hudson County DEMOCRATIC County Committee, do hereby request you to group together and bracket our names, and to print opposite our names as bracketed, on the said Primary Ticket for the ensuing Primary Election, the following designation:

Nosotros, los antedichos candidatos apoyados para los puestos de Miembros del Comité del Condado DEMOCRATA del Condado de Hudson, pedimos por la presente que nuestros nombres sean colocados juntos entre corchetes y que se ordene imprimir la siguiente designación enfrente de nuestros nombres entre los corchetes en la balota primaria para las elecciones primarias subsiguientes:

Arriue Arroyo  
SIGNATURE/FIRMA  
PRINT Name/ Escribe el nombre en LETRAS DE MOLDE

Alberto Ruzgan  
SIGNATURE/FIRMA  
PRINT Name/ Escribe el nombre en LETRAS DE MOLDE

Notice: All candidates are required by law to comply with the provisions of the "New Jersey Campaign Contributions and Expenditures Report Act". For further information, please call the Election Law Enforcement Commission 609-292-8700 or 609-613-3662.

Andreya DiMarco, Esq. - 128242015  
Schwartz ■ Edelstein Law Group LLC  
100 South Jefferson Road, Suite 200  
Whippany, New Jersey 07981  
(973) 301-0001  
Attorneys for Plaintiff

DR. FELIX ROQUE and DEMOCRATS  
FOR HUDSON COUNTY

Plaintiffs

vs.

HUDSON COUNTY DEMOCRATIC  
ORGANIZATION, JONATHAN  
CASTANEDA, CARMELA RICCIE,  
West New York Municipal Clerk, and E.  
JUNIOR MALDONADO, Hudson  
County Clerk

Defendants

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

**CIVIL ACTION**

**R. 1:4-4(c) CERTIFICATION OF  
SIGNATURE BY PORTABLE  
DOCUMENT FORMAT (PDF)**

I, Andreya DiMarco, of full age, do hereby certify as follows:

1. I am an attorney at law in the State of New Jersey, a member of the law firm of Schwartz ■ Edelstein Law Group LLC, attorneys for Plaintiffs Dr. Felix Roque and Democrats for Hudson County.

2. The Verification of Dr. Felix Roque contains a copy of Dr. Roque's signature, which he sent by facsimile or in Portable Document Format ("PDF"), or similar format. Dr. Roque acknowledged to me the genuineness of his signature. The Roque Verification with original signature affixed will be filed if requested.

I further certify that the foregoing statements made by me are true and accurate to the

best of my knowledge and belief. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

  
ANDREEA DIMARCO

DATED: April 16, 2018

## Civil Case Information Statement

### Case Details: HUDSON | Civil Part Docket# L-001439-18

**Case Caption:** ROQUE DR. VS HUDSON COUNTY  
DEMOCRATIC ORG

**Case Initiation Date:** 04/16/2018

**Attorney Name:** STEPHEN J EDELSTEIN

**Firm Name:** SCHWARTZ EDELSTEIN LAW GROUP

**Address:** 100 SOUTH JEFFERSON RD STE 200  
WHIPPANY NJ 07981

**Phone:**

**Name of Party:** PLAINTIFF : Roque, Dr. Felix

**Name of Defendant's Primary Insurance Company**  
(if known): None

**Case Type:** OTHER Election Issue

**Document Type:** Verified Complaint

**Jury Demand:** NONE

**Hurricane Sandy related?** NO

**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)?** 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:**

**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:**

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)

04/16/2018  
Dated

/s/ STEPHEN J EDELSTEIN  
Signed