

**Fair Share Housing Center**

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**Fair Share Housing Center, Inc.,**

**Plaintiff,**

**v.**

**The City of Jersey City and The  
Municipal Council of the City of  
Jersey City,**

**Defendants.**

Superior Court of New Jersey  
Law Division, Hudson County

Docket No. HUD-L-\_\_\_\_-20

**Civil Action**

**Complaint in Lieu of  
Prerogative Writs**

Plaintiff Fair Share Housing Center, Inc. ("FSHC"), by way of this Complaint in Lieu of Prerogative Writs, against Defendants the City of Jersey City ("Jersey City" or "City") and the Municipal Council of the City of Jersey City ("Council"), alleges and says:

**Introductory Statement**

1. This is an action brought pursuant to New Jersey Court Rule 4:69-1, et seq., challenging the validity of City of Jersey City Ordinance No. 20-089, "An Ordinance Creating Chapter 187 (Inclusionary Zoning) of the Municipal Code Requiring the Inclusion of Affordable Housing Units in All Development Projects With Residential Which Have Received Use Variances or Increased Density or Height." (A true and correct copy of said ordinance is attached hereto as **Exhibit A.**)

2. Ordinance No. 20-089 was adopted by the Municipal Council of the City of Jersey City on October 21, 2020, in violation of the statutorily mandated process in the Municipal Land Use Law, N.J.S.A. 40:55-1, et seq. (the "MLUL"), which required, prior to adoption, the "inclusionary zoning" ordinance to be referred to the City of Jersey City's Planning Board for consistency review with the City's Master Plan.

3. Instead of following this statutorily mandated process, a majority of the Council chose to unlawfully rush to adopt Ordinance No. 20-089 over widespread public opposition and criticism.

4. The members of the Council who supported Ordinance No. 20-089 claimed that it is designed to maximize affordable housing for those low- and moderate-income families in need.

5. In reality, Ordinance No. 20-089 grants Jersey City's municipal officials absolute discretion to trade away affordable housing as part of quid pro quo agreements with favored developers in clear violation of the MLUL and substantial precedent.

6. For the above reasons and those that follow, and based on the facts as set forth herein, FSHC requests that Ordinance No. 20-089 be invalidated and declared void.

#### **The Parties**

7. Plaintiff Fair Share Housing Center is a non-profit

organization based in the State of New Jersey. FSHC was founded in 1975, and FSHC is dedicated to defending the housing rights and interests of low- and moderate-income New Jerseyans, including those who live and work, and seek to live and work, in the City of Jersey City.

8. Defendant City of Jersey City is a municipal entity of the State of New Jersey, a body corporate and body politic, located in Hudson County, created pursuant to and required to act consistent with and in furtherance of the Constitution and laws of the State and the United States of America.

9. Defendant Municipal Council of the City of Jersey City is duly-constituted and authorized by State statute to oversee and serve as the legislative body of Jersey City, created pursuant to and required to act consistent with and in furtherance of the Constitution and laws of the State and the United States of America. The Council is responsible for the adoption of land use ordinances.

#### **Jurisdiction and Venue**

10. The Superior Court of New Jersey has jurisdiction over the Defendants because this Complaint alleges causes of action arising under New Jersey State law.

11. Venue for this action properly lies in the Superior Court, Hudson County, because the matters that are the subject of this Complaint and the events that gave rise to Plaintiff's claims

occurred in the State of New Jersey, County of Hudson, City of Jersey City.

12. At all relevant times, the Defendants acted under color of New Jersey State law.

### **Factual Background**

#### **A. Low- and Moderate-Income Families in the City of Jersey City Face a Housing Affordability Crisis.**

13. Low- and moderate-income families in the City of Jersey face a housing affordability crisis.

14. The Department of Housing and Urban Development defines households paying more than thirty percent (30%) of their income on rent as "cost burdened," which means these households "may have difficulty affording necessities such as food, clothing, transportation, and medical care."

15. In 2018, according to the U.S. Census Bureau's American Community Survey, 45.8% of Jersey City's renters were cost burdened, i.e., paying more than 30% of their household income on housing.

16. In 2018, according to the U.S. Census Bureau's American Community Survey, 43.4% of Jersey City's homeowners with a mortgage were cost burdened, i.e., paying more than 30% of their household income on housing.

17. In 2013, according to the U.S. Census Bureau's American Community Survey, the median rent for an apartment in Jersey City was \$1,174.

18. In 2018, according to the U.S. Census Bureau's American Community Survey, the median rent for an apartment in Jersey City was \$1,334.

19. In just five years, from 2013 to 2018, the median rent in Jersey City increased by 13.6%.

20. In 2013, according to the U.S. Census Bureau's American Community Survey, 30.6% of Jersey City renters paid more than \$1,500 per month.

21. In 2018, according to the U.S. Census Bureau's American Community Survey, 39.8% of Jersey City renters paid more than \$1,500 per month.

22. In just five years, from 2013 to 2018, the percentage of Jersey City renters paying more than \$1,500 per month increased by 9.2%.

**B. On October 7, 2020, Ordinance No. 20-089 Was Introduced by the Jersey City Council. Ordinance No. 20-089 Was Not Referred to the Jersey City Planning Board for the Statutorily Mandated Consistency Review.**

23. On October 7, 2020, Ordinance No. 20-089 was introduced, by a 7-2 vote, by the Jersey City Council at a regularly scheduled meeting.

24. Ordinance No. 20-089 was not referred by the Council to the Jersey City Planning Board for consistency review with the City's Master Plan.

25. Ordinance No. 20-089 states in its title that it is an "inclusionary zoning" ordinance. (Exh. A.)

26. Ordinance No. 20-089 notes in its preamble that it was adopted pursuant to the MLUL. (Exh. A.)

27. The Jersey City Council's failure to refer Ordinance No. 20-089 to the Planning Board violates the statutorily mandated process in the MLUL and directly contrasts with the process followed by other municipalities across New Jersey when adopting inclusionary zoning ordinances.

28. For example, on or about April 22, 2020, the City of Asbury Park adopted an inclusionary zoning ordinance after it had been referred to the Asbury Park Planning Board for consistency review. (A true and correct copy of Asbury Park Resolution No. 2020-115 referring the inclusionary zoning ordinance to the Asbury Park Planning Board is attached hereto as **Exhibit B.**)

29. In the resolution referring the inclusionary zoning ordinance to the Asbury Park Planning Board, Asbury Park's governing body stated that

the New Jersey Municipal Land Use Law, specifically at N.J.S.A. 40:55D-26, requires referral to the Planning Board of any development regulation or amendment thereto, so that the Planning Board may review the proposed legislation and determine whether it is consistent with the Master Plan and/or make any other recommendations that it deems appropriate to the Governing Body.

[(Exh. B.)]

30. In another example, on or about October 1, 2019, the governing body of the Township of Parsippany-Troy Hills adopted an

inclusionary zoning ordinance after it had been referred to the Parsippany-Troy Hills Planning Board for consistency review. (A true and correct copy of Parsippany-Troy Hills Ordinance No. 2019:63 is attached hereto as **Exhibit C.**)

31. The inclusionary zoning ordinance adopted by the governing body of Parsippany-Troy Hills states:

After introduction, the Township Clerk is hereby directed to submit a copy of the within Ordinance to Planning Board of the Township [o]f Parsippany-Troy Hills for its review in accordance with N.J.S.A. 40:55D-26 and N.J.S.A. 40:55D-64. The Planning Board is directed to make and transmit to the Township Council, within 35 days after referral, a report including identification of any provisions in the proposed ordinance which are inconsistent with the master plan and recommendations concerning any inconsistencies and any other matter as the Board deems appropriate.

[(Exh. C.)]

**C. On October 21, 2020, Ordinance No. 20-089 Was Adopted by the Jersey City Council After More Than Four Hours of Public Criticism and Opposition.**

32. On October 21, 2020, Ordinance No. 20-089 was adopted, by a 7-2 vote, by the Jersey City Council.

33. The Council adopted the ordinance after more than four hours of public criticism and opposition from dozens of speakers.

34. Jersey City resident Dana Patton was quoted as stating: "You could not have come up with a weaker resolution." (A true and correct copy of an October 22, 2020 article published

by the Hudson County View, titled "4 Hours of Public Comment Doesn't Stop Jersey City Council from Approving IZO" is attached hereto as **Exhibit D.**)

35. Eleana Little, of NJ-08 for Progress and the Hudson County Progressive Alliance, was quoted as stating: "This is a pay to play disaster waiting to happen." (Exh. D.)

36. Amy Torres, of Solidarity Jersey City and the Hudson County Progressive Alliance, was quoted as asking: "How could any of you vote for this in good conscience?" She was reported as stating that "the council majority was being motivated to pass the ordinance in its current form so that developers would continue to back their re-election bids next year." (Exh. D.)

37. Representatives on behalf of other civil rights and community groups across Jersey City also spoke against Ordinance No. 20-089 on October 21, 2020, including but not limited to the Jersey City NAACP and the Morris Canal Community Development Corporation.

38. The public opposition and criticism voiced at the October 21, 2020 council meeting was reflected elsewhere in the run-up and following the adoption of Ordinance No. 20-089.

39. A petition circulated online prior to the meeting in opposition to Ordinance No. 20-089, which called for major revisions to the proposed ordinance, received at least 719 signatures.



40. An October 8, 2020 article on JerseyDigs.com, titled "Not Without Controversy, Jersey City Advances Inclusionary Housing Ordinance," explained that "Jersey City has seen a building boom in recent years but has not created affordable housing units in step with growth." (A true and correct copy of said article is attached hereto as **Exhibit E.**)

41. The article quoted Councilman James Solomon as stating that the proposed ordinance "provides 'too much flexibility' for developers." (Exh. E.)

42. The article quoted Councilman Rolando Lavarro as stating that "there were 'gaping loopholes' in the law." (Exh. E.)

43. An October 16, 2020 editorial from the Jersey Journal's Editorial Board, titled "Too Many Loopholes in Jersey City's Affordable Housing Proposal," stated:

After a year of discussion and seeming public input, the inclusionary housing ordinance introduced by the Jersey City council last week is exceedingly disappointing.

. . . .

As written, . . . the ordinance offers developers so many outs it's hard to envision many new "affordable" units being created at all. And that lack will be exacerbated by the certainty that gleaming new buildings will raise the cache of block after block, neighborhood after neighborhood, with rents in even the most modest of buildings destined to rise.

[(A true and correct copy of said editorial is attached hereto as **Exhibit F.**)]

44. A November 18, 2020 editorial from the Jersey Journal's Editorial Board, titled "Beware the Jersey City Council's 7-2 Dance," stated:

The consistent 7-2 votes at recent council meetings have given us cause for concern.

. . . .

We found the 7-2 vote last month on the mayor's inclusionary housing ordinance -- which has drawn negative reviews from many in the affordable housing arena -- particularly disconcerting. Some 60 people spoke against it during more than four hours of public testimony at the meeting, but the soldiers didn't budge.

[(A true and correct copy of said editorial is attached hereto as **Exhibit G.**)]

**D. Ordinance No. 20-089**

45. Ordinance No. 20-089 grants Jersey City's municipal officials absolute discretion to trade away affordable housing as part of quid pro quo agreements with favored developers in clear violation of the MLUL and substantial precedent.

46. The ordinance states in Section 187-3(a) that, subject to significant exemptions, it would apply to developments of fifteen (15) or more units that receive "an additional five (5) units or . . . five thousand (5,000) square feet of additional residential floor area" through "[a] variance pursuant to" N.J.S.A. 40:55D-70(c), (d) or "[a] Redevelopment Plan amendment." (Exh. A.)

47. The ordinance states in Section 187-3(b) (2) that,

where it applies, a "[t]wenty percent (20%) set aside shall be provided" of affordable housing. (Exh. A.)

48. However, the remainder of the ordinance is written to ensure that the City can negotiate for illegal exactions from developers without actually requiring the affordable housing to be provided.

49. Section 187-8 states that the requirements of the ordinance "may be waived by the City Council." (Exh. A.)

50. Section 187-8 does not have any standards or criteria that would guide or govern when or why the ordinance could be waived. (Exh. A.)

51. Section 187-8 allows the City Council to waive the affordable housing requirements for any developer at any time for any reason. (Exh. A.)

52. When the ordinance is not waived by the City Council, Section 187-3(b)(3) states that the ordinance only actually mandates "[a] minimum of five percent (5%) of the Affordable Housing requirement . . . on-site." (Exh. A.)

53. The ordinance otherwise allows developers, in exchange for not providing the other fifteen percent (15%) of the affordable housing on-site, to make so-called "community contributions," payments in lieu, and/or to provide affordable housing off-site. (Exh. A.)

54. In Section 187-5(d), the ordinance would allow

developers to make payments as low as \$25,000 per unit in "Tier 1" for not providing an actual affordable unit. The highest payment amount per affordable unit that would be required under the ordinance is \$100,000 in "Tier 5." (Exh. A.)

55. The Third Round Rules adopted by the Council on Affordable Housing in 2008 stated that, in Region 1, which is Jersey City's housing region, the State's determination was that the appropriate payment in lieu amount required to actually construct an affordable unit was \$180,267. See N.J.A.C. 5:97-6.4(c).

56. In Section 187-6, the ordinance would allow the "Approving Authority," after "consult[ation] with the councilperson for the ward, . . . to approve a reduction in the mandatory on-site Affordable Housing requirement relative to the value of community benefits proposed by the developer." (Exh. A.)

57. Section 187-6 does not limit what could be deemed an adequate "community benefit." (Exh. A.)

58. Section 187-6(A)(2) simply states that "[e]ligible community benefits may consist of, but are not limited to, . . . : construction of a public facility, such as, but not limited to, public schools, public recreational facilities, government offices, fire stations, police stations, public parking garages, public transportation systems or facilities, roads and water infrastructure, etc." (Exh. A.)

59. No statutory authority allows a municipality to accept "community benefits" in lieu of required affordable housing.

60. Section 187-6(A)(2) would allow Jersey City's municipal officials to trade away homes for low- and moderate-income families in exchange for a parking garage or swimming pool for the rich without any statutory authority granting the municipality the authority to permit such an arrangement.

61. Section 187-6(A) states that trading away affordable housing for "community benefits will only be considered for projects in redevelopment areas." (Exh. A.)

62. All, or almost all, new residential development in Jersey City is in redevelopment areas.

63. Section 187-6(A)(1) states that prior to trading away affordable housing for "community benefits," the developer has to pay "\$5,000[] to the City of Jersey City to cover the administrative fees required for the fiscal analysis study to determine the value of the proposed community benefit in comparison to the gain in land value resulting from a Redevelopment Plan amendment."

64. Ordinance No. 20-089 offers no criteria to guide or govern when a "community benefit" in lieu of affordable housing would be (in)appropriate.

**FIRST COUNT****Ordinance No. 20-089 Is Invalid Due to the  
Jersey City Council's Failure to Comply With the MLUL's  
Statutorily Mandated Process**

65. Plaintiff repeats and incorporates each of the foregoing paragraphs of this Complaint for purposes of this count as if set forth at length herein.

66. The October 21, 2020 action of the Jersey City Council adopting Ordinance No. 20-089 violated the MLUL's statutorily mandated process.

67. N.J.S.A. 40:55d-62(a) generally requires that all zoning ordinances and zoning amendments be substantially consistent with the Land Use Element of a municipality's Master Plan or designed to effectuate such Plan elements. Where, however, the governing body "adopts a zoning ordinance or amendment or revision thereto which in whole or part is inconsistent with or not designed to effectuate the land use plan element and the housing plan element," the governing body may do so, "but only by affirmative vote of a majority of the full authorized membership of the governing body, with the reasons of the governing body for so acting set forth in a resolution and recorded in its minutes when adopting such a zoning ordinance."

68. In order to determine whether a zoning ordinance is consistent with a municipality's Master Plan, N.J.S.A. 40:55D-64 requires:

Prior to the hearing on adoption of a zoning ordinance, or any amendments thereto, the governing body shall refer any such proposed ordinance or amendment thereto to the planning board pursuant to subsection 17a. of this act.

[(emphases added).]

69. N.J.S.A. 40:55D-26 also requires:

Prior to the adoption of a development regulation, revision, or amendment thereto, the planning board shall make and transmit to the governing body, within 35 days after referral, a report including identification of any provisions in the proposed development regulation, revision or amendment which are inconsistent with the master plan and recommendations concerning these inconsistencies and any other matters as the board deems appropriate. The governing body, when considering the adoption of a development regulation, revision or amendment thereto, shall review the report of the planning board and may disapprove or change any recommendation by a vote of a majority of its full authorized membership and shall record in its minutes the reasons for not following such recommendation.

[(emphases added).]

70. The Jersey City Council introduced Ordinance No. 20-089 on October 7, 2020.

71. Ordinance No. 20-089 states in its title that it is an "inclusionary zoning" ordinance, and it amends Jersey City's zoning to require an affordable housing set-aside under the circumstances detailed therein.

72. Ordinance No. 20-089 notes in its preamble that it was adopted pursuant to the MLUL.

73. The Jersey City Council did not refer Ordinance No. 20-089 to the Jersey City Planning Board for the statutorily mandated Master Plan consistency review under the MLUL.

74. The Jersey City Council adopted Ordinance No. 20-089 on October 21, 2020, over widespread public criticism and opposition without having abided by the requirements of the MLUL.

75. The Jersey City Council's failure to refer Ordinance No. 20-089 to the City's Planning Board for consistency review with the Master Plan violated the MLUL and renders Ordinance No. 20-089 invalid and void as of law.

**WHEREFORE**, FSHC demands judgment as follows: (a) finding that the Jersey City Council's adoption of Ordinance No. 20-089 violated the MLUL and was ultra vires; (b) declaring Ordinance No. 20-089 invalid, illegal, null, void, and without effect; and (c) awarding attorneys' fees, costs of suit and such other and further equitable relief as may be just and proper.

#### **SECOND COUNT**

**Ordinance No. 20-089 Is Invalid Because**  
**It Unlawfully Enables Jersey City's Municipal Officials**  
**To Negotiate for and to Accept Illegal Exactions**  
**in Lieu of Affordable Housing**  
**in Violation of the MLUL and Case Law**

76. Plaintiff repeats and incorporates each of the foregoing paragraphs of this Complaint for purposes of this count as if set forth at length herein.

77. The October 21, 2020 action of the Jersey City Council adopting Ordinance No. 20-089 is invalid because the



ordinance unlawfully enables Jersey City's municipal officials to trade away affordable housing for illegal exactions in violation of the MLUL and substantial precedent.

78. N.J.S.A. 40:55D-42 authorizes municipalities to require a developer "to pay the pro-rata share of the cost of providing only reasonable and necessary street improvements and water, sewerage and drainage facilities, and easements therefor, located off-tract but necessitated or required by construction or improvements within such subdivision or development."

79. In enacting the above statute, the New Jersey Legislature strictly limited a municipality's authority to require off-tract improvements and expressly rejected the broader authority that existed under the MLUL's predecessor. See N.J. Builders Asso. v. Bernards Twp., 211 N.J. Super. 290, 297 (Law Div. 1985), aff'd, 219 N.J. Super. 539 (App. Div. 1986), aff'd, 108 N.J. 223 (1987).

80. Accordingly, the New Jersey Supreme Court has held that there must be "a strong, almost but-for, causal nexus between off-site public facilities and private development in order to justify exactions." Toll Bros., Inc. v. Bd. of Chosen Freeholders of Burlington, 194 N.J. 223, 244 (2008) (quoting Holmdel Builders Ass'n v. Holmdel, 121 N.J. 550, 571 (1990)).

81. The Court has explained that

[a]uthorizing off-tract improvements beyond a developer's pro-rata share through the guise of 'volunteerism' is problematic from many perspectives. At heart, it fails to provide

an adequate safeguard against municipal duress to procure otherwise unlawful exactions because the line between true volunteerism and compulsion is a fragile one. . . . In addition to the problem of compulsion, so-called voluntary contributions are not much different than a pay-to-play system, where developers are rewarded for their 'philanthropic' gifts. Allowing such a scheme not only impacts the developers willing to pay, but threatens the livelihood of those unable or unwilling to submit to the illicit exaction toll.

[Toll Bros., 194 N.J. at 251.]

82. The Court has further explained that

[o]ur case law has been extremely sensitive to the threat presented by unlawful exactions imposed by a municipality on developers, whether the developers are reluctant or enthusiastic participants in the transaction.

. . . .

. . . [Exactions] constitute an improper incentive that impermissibly taints the municipality's action on the development application, and thereby undermines the principle of objective and impartial review of development applications that the MLUL is intended to assure.

[Swanson v. Planning Bd., 149 N.J. 59, 67-68 (1997) (Stein, J., concurring).]

83. Ordinance No. 20-089 would enable Jersey City's municipal officials to negotiate for, demand, and/or accept "community contributions" -- i.e., illegal exactions -- from private developers in exchange for a reduction in the required affordable housing.

84. Ordinance No. 20-089 offers no criteria to guide or

govern when a "community contribution" in lieu of affordable housing would be (in)appropriate.

85. Ordinance No. 20-089 leaves the definition of "community contributions" wholly open ended, and it notes that "eligible community benefits may consist of, but are not limited to, . . . : construction of a public facility, such as, but not limited to, public schools, public recreational facilities, government offices, fire stations, police stations, public parking garages, public transportation systems or facilities, roads and water infrastructure, etc."

86. There is no statutory authority that permits municipalities to accept "community contributions" from private developers in lieu of providing required affordable housing.

87. Moreover, the MLUL and substantial precedent strictly limits off-tract improvements that a municipality may demand and/or accept from a private developer to "only reasonable and necessary street improvements and water, sewerage and drainage facilities, and easements therefor, located off-tract but necessitated or required by construction or improvements within such subdivision or development." N.J.S.A. 40:55D-42.

88. Thus, Ordinance No. 20-089 violates the MLUL and substantial precedent by setting up an unlawful scheme that allows Jersey City's municipal officials, under the guise of affordable housing, to negotiate on a case-by-case basis for illegal exactions

from private developers that they would otherwise be forbidden from demanding and/or accepting.

89. This illegal scheme and the threat that "community contributions" will "constitute an improper incentive that impermissibly taints the municipality's action on the development application" renders Ordinance No. 20-089 invalid and void as a matter of law.

**WHEREFORE**, FSHC demands judgment as follows: (a) finding that the Jersey City Council's adoption of Ordinance No. 20-089 violated the MLUL and was ultra vires; (b) declaring Ordinance No. 20-089 invalid, illegal, null, void, and without effect; and (c) awarding attorneys' fees, costs of suit and such other and further equitable relief as may be just and proper.

**THIRD COUNT**  
**New Jersey Civil Rights Act**

90. Plaintiff repeats and incorporates each of the foregoing paragraphs of this Complaint for purposes of this count as if set forth at length herein.

91. The New Jersey Civil Rights Act, N.J.S.A 10:6-1, et seq., protects the citizens of New Jersey from being deprived of their state and federal constitutional and statutory civil rights.

92. The City has violated the New Jersey Civil Rights Act, N.J.S.A. 10:6-1, et seq., and deprived lower-income New Jerseyans of their rights by adopting Ordinance No. 20-089 in violation of the statutorily mandated process in the MLUL that

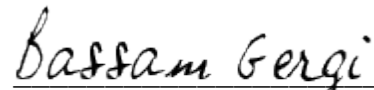
required referral and a determination from the Jersey City Planning Board as to whether the ordinance was consistent with the City's Master Plan prior to adoption.

93. The City has violated the New Jersey Civil Rights Act by unlawfully adopting an ordinance that puts in place an unlawful scheme that will deprive lower-income New Jerseyans of their rights to the provision of decent and affordable housing by granting municipal officials absolute discretion to trade it away in exchange for illegal exactions.

**WHEREFORE**, FSHC demands judgment as follows: (a) declaring that Jersey City has violated the New Jersey Civil Rights Act, N.J.S.A. 10:6-1, et seq.; (b) declaring that Hoboken has violated the statutory and constitutional rights of lower-income households; and (c) requiring Jersey City to pay appropriate civil penalties to the State of New Jersey and attorneys' fees to FSHC and such other costs of suit and further equitable relief as may be just and proper.

FAIR SHARE HOUSING CENTER  
Attorney for Plaintiff

Dated: December 7, 2020

  
Bassam F. Gergi, Esq.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:25-4, Bassam F. Gergi, Esq., is hereby designated as trial counsel on behalf of Plaintiff Fair Share Housing Center.

Dated: December 7, 2020

Bassam Gergi  
Bassam F. Gergi, Esq.

**Rule 4:5-1 CERTIFICATION**

Pursuant to Rule 4:5-1, I hereby certify that, to the best of my knowledge, information and belief, the subject matter of the within controversy does not form the basis of any other action presently pending in any court or arbitration proceeding. Also, to the best of my knowledge, information and belief, no other action or arbitration proceeding is contemplated at this time, and I know of no other party who should be joined in this action.

Dated: December 7, 2020

Bassam Gergi  
Bassam F. Gergi, Esq.