

CITY OF HOBOKEN
Office of Corporation Counsel

RAVINDER S. BHALLA
Mayor



BRIAN ALOIA, ESQ.
Corporation Counsel

September 10, 2021

Via Email and eCourts

Hon. Jeffrey R. Jablonski, P.J. Ch.
Hudson County Superior Court
William J. Brennan Courthouse
583 Newark Avenue, 2nd Floor
Jersey City, NJ 07306


Re: Motion to Finalize the Certification of Candidates for the Hoboken Municipal Election (November 2021)

Dear Judge Jablonski:

I am the Corporation Counsel for the City of Hoboken. As discussed with your staff, an issue has arisen regarding certification of candidates for three (3) people seeking to be placed on the ballot for the Hoboken municipal election. Attached please find a certification of the City of Hoboken Deputy Municipal Clerk as to the facts surrounding the certification of candidates for November's general election. As described in the Certification, N.J.S.A. 40:45-5 ("Uniform Nonpartisan Elections Law") and Title 19 ("Elections-Direct Nomination by Petition") were improperly applied by the Municipal Clerk's Office.

Therefore, the City respectfully requests that the Court review the facts as presented herein, and make a determination as to whether prospective candidates Ian Rintel, Cindy Wiegand, and Manual Rivera should be included on the ballot, rejected, or be provided additional time to correct deficiencies. We greatly appreciate Your Honor's consideration of this matter.

Respectfully Submitted,


Brian J. Aloia, Esq.
Corporation Counsel

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MOTION TO FINALIZE THE CERTIFICATION
LIST OF CANDIDATES FOR THE HOBOKEN
NON-PARTISAN MUNICIPAL ELECTION

SUPERIOR COURT OF NEW JERSEY
HUDSON COUNTY

CERTIFICATION OF JERRY LORE

I, Jerry Lore, of full age, hereby certify the following to be true:

1. I am the Deputy City Clerk for the City of Hoboken. I have been an employee of the City of Hoboken for 11 years. I have been in the Clerk's Office since April 2008.
2. In my role, I oversee the municipal elections, including the accepting of petitions for candidates.
3. The City of Hoboken has municipal elections during the November general elections. In 2021, there is a mayoral election and a three (3) City Council "at-large" positions up for election. The City of Hoboken has non-partisan elections controlled by N.J.S.A. 40:45-5 and Title 19.
4. I have printed out and utilized the 2021 General Election Timeline found on the New Jersey State website for reference during the election process. **See "Exhibit A."**
5. That being said, I now know that I misunderstood the timeline. Although the Clerk's Office applied the same time frames to all candidates, the Clerk's Office did not follow any of the deadlines set forth in the General Election Timeline, except for the receipt of petitions which were due on August 30, 2021.
6. I now recognize that the deadlines I enforced for the Clerk's Office to notify candidates of defects, to correct defects, as well as the acceptance of a challenge and my handling and response to same may have prejudiced some of the candidates attempting to be included in

the ballot. Furthermore, I certified candidate Ms. Wiegand to be included in the ballot even though I do not believe she submitted enough valid nominating petitions.

7. Pursuant to this timeline and N.J.S.A. 40:45-8, nominating petitions for the municipal non-partisan elections were due on August 30, 2021.
8. Pursuant to the list of eligible voters as of February 2021, the number of petitions required to be accepted onto the ballot was 431, in accordance with N.J.S.A. 40:45-8. See **“Exhibit B”**. This is the number of petitions which was communicated to all prospective candidates.
9. Ten (10) prospective candidates submitted nominating petitions on August 30, 2021.
10. Pursuant to the prior practice established within the Clerk’s Office, in order to verify the petitions, employees review the petitions to ensure that the candidate is a registered voter. If the voter is not found, they are deemed defective and the candidate is notified accordingly.
11. I now understand that pursuant to N.J.S.A. 40:45-9(b) and (c), the Clerk’s Office should have also been reviewing to determine whether the same individual signed more certificates for candidates for office than there are places to be filled for the office. For example, there are only three (3) “at-large” City Council seats available, and the same person signed four (4) petitions.
12. However, the City Clerk’s office did not review the petitions for conformance with N.J.S.A. 40:45-9(b).
13. On September 3, 2021, I advised three (3) prospective candidates that there were defects found in their petitions: Cindy Wiegand, Ian Rintel, and Manuel Rivera. I advised these candidates of the defects by way of letter which was emailed and sent certified mail. I did not specify the defects in accordance with N.J.S.A. 40:45-9(c). **Exhibit C**. I now understand that we should have been advising candidates of any defects as soon as petitions were received in accordance with N.J.S.A. 40:45-9(c), however, due to staffing levels, the 3rd was the earliest we were able to advise these individuals.
14. I recognize now that I should have requested more staff, however, that did not occur to me until I became aware that I had misunderstood the deadlines.
15. Based upon the City Clerk’s review, Mr. Rintel had 409 valid petitions out of 508 petitions submitted, Ms. Wiegand had 421 valid petitions out of 519 submitted, and Mr. Rivera had 409 valid petitions out of 431 petitions submitted.
16. I provided the candidates until September 9, 2021 to amend their petitions. I did this notwithstanding N.J.S.A. 40:45-9 which indicates that no amendment shall be made after 61 days before the election, which would have been September 2, 2021.

17. I told Vijay Chaudhuri, the campaign manager for “Team Bhalla” that the deadline to file a challenge was September 8, 2021, despite the fact that pursuant to N.J.S.A. 19:13-10, September 3, 2021, is the filing deadline for objections to nominating petitions for municipal non-partisan elections.
18. On September 8, 2021, a challenge was filed by Mr. Chaudhuri based upon the fact that multiple residents signed petitions for at least four (4) City Council “at-large” candidates, when there are only three (3) spots to be filled. (See NJSA 40:45-9(b))¹. See “**Exhibit D**”.
19. As to Ms. Wiegand, eleven (11) of her petitions were signed by more than three (3) individuals. There were also challenges to certain petitions which did not contain either the address for either the candidate or the signatory.
20. On September 7, 2021, I advised Ms. Wiegand that she required ten (10) corrected petitions to meet the threshold of 431. By the end of the day on September 9, 2021, Ms. Wiegand had corrected fourteen (14) petitions. I understand that no amendments should have been made after September 2, 2021. N.J.S.A. 40:45-9
21. I did not communicate Mr. Chaudhuri’s challenge to Ms. Wiegand until September 9, 2021 at which point I verbally advised Ms. Wiegand of the challenge and provided her with a copy of same.
22. Ms. Wiegand cured the procedural defects identified in Mr. Chaudhuri’s challenge related to the addresses before the end of the day on September 9, 2021. I now understand that pursuant to N.J.S.A. 40:45-9, no amendment was permitted after September 2, 2021. I also recognize the challenge should not have been accepted after September 3, 2021. N.J.S.A. 19:13-10.
23. Ms. Wiegand was not able to take any action with regard to the petitions which were signed by more than three (3) candidates.
24. Taking the petitions executed by individuals who signed more than three (3) petitions into consideration, it is my opinion that Ms. Wiegand has 424 valid petitions and not the 431 required.
25. Because of these facts, I respectfully request that the Court make a determination as to whether Ms. Wiegand should remain accepted as a candidate, rejected as a candidate, or given more time to correct her petitions.

¹ b. Each certificate shall contain the name of one candidate, and no more. Each signer must not, at the time of signing the certificate, have signed more certificates for candidates for that office than there are places to be filled for the office. Where ward councilmen are to be elected, no petitioner shall sign more than one certificate for ward council, and the candidate named in the petition shall reside in the same ward as the signer. All certificates not complying substantially with this act shall be rejected. N.J. Stat. Ann. § 40:45-9 (West)

26. As to Mr. Rintel, he advised me by way of email on September 8, 2021, that he was not able to cure his petitions due to the holiday of Rosh Hashanah. He also challenged the fact that he was not able to submit electronic petitions, which was a determination made by our office as to all candidates. See **“Exhibit E.”**
27. On September 9, 2021, I advised Mr. Rintel that since he had not attempted to cure any of his petitions, and he was short twenty (22) pursuant to my calculations, he was not going to be certified to be on the ballot. In response, Mr. Rintel submitted a letter challenging this determination based upon the fact that he had submitted more than enough seemingly conforming petitions, and there had been no challenge submitted.
28. I did not inform Mr. Rintel of Mr. Chaudhuri’s challenge. However, taking into consideration voters who executed more than three (3) petitions, Mr. Rintel would be short thirty-three (33) petitions.
29. If the correct deadlines were followed, Mr. Rintel would have been notified of the defective petitions in a timelier manner and would have had an opportunity to attempt to cure his petitions by September 2, 2021 (pursuant to N.J.S.A. 40:45-9) prior to Rosh Hashanah.
30. Based upon these facts, I respectfully request that the Court make a determination as to whether Mr. Rintel should remain rejected, be accepted as a candidate onto the ballot, or be given additional time to correct his petitions.
31. As to Mr. Rivera, he was also short twenty-two (22) petitions according to the Clerk’s review of whether the signatories were registered voters.
32. On September 9, 2021, Mr. Rivera emailed me (See **“Exhibit F”**) indicating that he was not able to correct his petitions in the time allotted (between the notification on September 3, 2021 and the deadline of September 9, 2021).
33. Taking into consideration voters who executed more than three (3) petitions, Mr. Rivera is short 22 petitions.
34. Similar to Mr. Rintel, Mr. Rivera should have been notified of the defective petitions in a timelier manner and provided an opportunity to cure his petitions by September 2, 2021 in accordance with N.J.S.A. 40:45-9.
35. Based upon these facts, I respectfully request that the Court make a determination as to whether Mr. Rivera should be given additional time to cure his petition, or be accepted as a candidate on the ballot.

I CERTIFY THAT THE ABOVE 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.



JERRY LORE

Dated: 9/10/21

EXHIBIT A

2021 General Election Timeline

June

June 8

Nomination Petition Filing Deadline for Independent Candidates for General Election

(before 4:00 p.m. of the day of the primary election)

N.J.S.A. 19:13-9

June 8

School & Fire District to Submit Notice to County Clerks of Available Offices for Upcoming General Election

(on or before primary election)

N.J.S.A. 19:60-7

June 11

Deadline for Amendments to Defective Petitions for Independent General Election Candidates

(3 days after filing deadline)

N.J.S.A. 19:13-13

June 14

Filing Deadline for Objections to Nomination Petitions for Independent General Election Candidates

(no later than 4 days after filing deadline)

N.J.S.A. 19:13-10

June 17

Deadline for Determination of Petition Challenge for Independent General Election Candidates

(9 days after the last day for filing nomination petitions)

N.J.S.A. 19:13-11

July

July 1

Submission of Evening Registration Plan by County Commissioners of Registration to the Secretary of State

(on or before July 1st)

N.J.S.A. 19:31-2

***In counties where there is a Superintendent of Elections, that office serves as the Commissioner of Registration; in all other counties it is the County Board of Election.*

July 5

Publication of Notice of Fire District Nomination Petition Filing Deadline by the Board of Fire Commissioners

(21 days prior to the nomination petition filing deadline)

N.J.S.A. 40A:14-72(c)

July 26

Nomination Petition Filing Deadline for School & Fire District Election Candidates for General Election

(last Monday in July)

N.J.S.A. 19:60-7

2021 General Election Timeline

July 29

Deadline for Amendments to Defective Petitions for School & Fire District Election Candidates
(3 days after filing deadline)

N.J.S.A. 19:13-13

July 30

Filing Deadline for Objections to Nomination Petitions for School & Fire District Election Candidates

(no later than 4 days after filing deadline)

N.J.S.A. 19:13-10

August

August 2

Deadline for Submission of Proposed Amendments to the State Constitution to be Voted Upon at the General Election

(not less than 3 months prior to submission to the voters)

NJ Constitution, Article IX, par. 3

August 5

Deadline for Determination of Petition Challenge for School & Fire District Election Candidates for General Election

(10 days after the last day for filing nomination petitions)

N.J.S.A. 19:60-7

August 7

Deadline for Filing in Superior Court to Protect School & Fire District Election Candidate's Rights

(12 days after petition filing deadline)

N.J.S.A. 19:60-7

August 8

Deadline for Secretary of State to Submit to the County Clerks the Statement of All Duly Nominated Candidates for General Election

(not later than 86 days before election)

N.J.S.A. 19:13-22

August 9- 3 p.m.

Drawing of Ballot Position for General Election Candidates by the County Clerks

(85 days before election)

N.J.S.A. 19:14-12

August 13

Deadline for Submission of Non-binding County and Municipal Public Questions to the County Clerks for Printing on the General Election Ballot

(81 days before election)

N.J.S.A. 19:37-1

2021 General Election Timeline

August 24

Deadline for Submission of Public Questions (Other Than Proposed Amendments to the NJ Constitution)

(not less than 70 days following final action of the Governor or the Legislature)

NJ Constitution, Article II, Sec. 1, P. 2

August 24

Deadline for Independent Candidates to Decline Nomination for General Election

(70 days before election)

N.J.S.A. 19:13-16

August 24

Deadline for Withdrawal of School Board & Fire District Candidates

(70 days before election)

N.J.S.A. 19:60-7

August 27

Deadline for Submission to the County Clerk of Municipal Non-binding Public Questions Adopted by the Municipal Governing Body Upon the filing of a Qualified Petition by the Local Electorate

(67 days before election)

N.J.S.A. 19:37-1.1

August 30

Nomination Petition Filing Deadline for New Nomination Petition to fill a Vacancy for Independent Candidates and School Election & Fire District Candidates for the General Election

(before 4:00 p.m. on or before 64th day prior to election)

N.J.S.A. 19:13-19

August 30

Nomination Petition Filing Deadline for Municipal Non-Partisan Candidates to be voted at the November General Election

(on or before 64th day prior to election)

N.J.S.A. 40:45-8

September

September 2

Deadline for Amendment to Defective Petitions for Municipal Non-Partisan Candidates to be voted at the November General Election

(not later than 61 days before election)

N.J.S.A. 40:45-9

September 3

Deadline to Submit Public Question for November School Board Elections to the County Clerk by the School Board Secretary

(60 days before election)

N.J.S.A. 19:60-4

2021 General Election Timeline

September 3

Filing Deadline for Objections to Nominating Petitions for Municipal Non-Partisan Candidates
(no later than 4 days after filing deadline)

N.J.S.A. 19:13-10

September 7

Last Day Vacancy Can Occur for Primary Election Nominees for the General Election
(56 days before election)

N.J.S.A. 19:13-20

September 7

Publication of Notice of Mail-In Ballot Availability for General Election by County Clerks
(prior to the 55th day before election)

N.J.S.A. 19:63-6

September 8

Deadline for Determination of Petition Challenge to Municipal Non-Partisan Candidates to be Voted at the November General Election

(9 days after the last day for filing nomination petitions)

N.J.S.A. 19:13-11

September 9

Deadline for Filling Primary Nominee Vacancy for General Election
(54 days before election)

N.J.S.A. 19:13-20

September 12 - October 11

Publication of Notice of General Election by County Boards of Election
(within 30 days before the close of registration election)

N.J.S.A. 19:12-7

September 13*

Deadline for Preparation of Official General Election Ballot for Printing
(50 days before election)

N.J.S.A. 19:14-1

** County Commissioner of Registration is to provide notice to the two County Chairpersons of the date to inspect voting machines after they have been prepared for the upcoming election. This date will vary from county to county. N.J.S.A. 19:48-6*

Drawing at 12 PM

September 18

Commencement of Mailing of Mail-In Ballots for General Election
(45 days before election)

N.J.S.A. 19:63-5, N.J.S.A. 19:63-9

October

October 12

Voter Registration Deadline for General Election
(21 days before election)

N.J.S.A. 19:31-6

2021 General Election Timeline

October 12

Mandated Evening Voter Registration Available for General Election in Offices of County Commissioners of Registration

(optional for Municipal Clerks)

(21 days before election)

N.J.S.A. 19:31-2

October 19

Deadline for Filing of Challenger Appointments for General Election

(second Tuesday preceding election)

N.J.S.A. 19:7-3

October 24 - October 30

Publication of Notice of General Election by County Boards of Election

(once during the calendar week prior to election)

N.J.S.A. 19:12-7

October 26

Publication of Challenge and Complaint Procedures for General Election by County Boards of Election

(7 days before election)

N.J.S.A. 19:12-9

October 26

Deadline to apply for a Mail-In Ballot by Mail for General Election

(not less than 7 days prior to election)

N.J.S.A. 19:63-3

October 27

Mailing of Sample Ballots for General Election

(on or before 12 noon on Wednesday preceding the election)

N.J.S.A. 19:14-25

October 29

Deadline for Application to Receive General Election Mail-In Ballots by Electronic Means for Qualified Overseas Civilian and Military Voters

(4th day before election)

N.J.S.A. 19:59-4

November

November 1 – by 3:00 p.m.

Deadline for In-Person Mail-In Ballot Applications for General Election

(up to 3:00 p.m. on the day before election)

N.J.S.A. 19:63-3

November 1

Publication of Challenge and Complaint Procedures for General Election by County Boards of Election

(1 day before election)

N.J.S.A. 19:12-9

2021 General Election Timeline

November 2

General Election

(Tuesday after first Monday in November)

N.J.S.A. 19:2-3, N.J.S.A. 19:15-2

November 2

Last Day for Testing of Electronic Scanning Equipment for Tabulation of Paper Ballots for General Election

(day of election)(notice to be given 48 hours prior to the start of testing)

N.J.S.A. 19:53A-8

November 2

Deadline for Post Office Receipt of Mail-In Ballots from the General Election

November 2

Deadline for in Person Submission of General Election Mail-In Ballots to County Boards of Election

(by 8:00 p.m. on the day of election)

N.J.S.A. 19:63-16

November 3 - November 19

Impoundment Period for Voting Machines Used in the General Election

(17 days following election) (to comply with P.L. 2018, c.72)

November 8

Deadline for Receipt of Timely Mailed Postmarked Mail-In Ballots to County Boards of Election

(no later than 144 hours (6 days) after the time of the closing of the polls for the election)

N.J.S.A. 19:63-22

November 15

Meeting of County Board of Canvassers for General Election

(13 days after the election)

N.J.S.A. 19:19-1; N.J.S.A. 19:19-4; N.J.S.A. 19:19-6

November 20

Deadline for County Clerk to transmit Official General Election Results to the Secretary of State

(5 days after the meeting of the board)

N.J.S.A. 19:20-6

November 19

Deadline for Recount Applications for General Election

(within 17 days after election)

N.J.S.A. 19:28-1

November 19

Deadline for Applications for Recheck of Voting Machines Used in the General Election

(within 17 days after election) (to comply with P.L. 2018, c.72)

2021 General Election Timeline

November 19

Deadline for Preparation of Emergency and Provisional Ballot Reports by Each County Board of Election for the General Election

(within 17 days after the election or 3 days after the certification of the results of the election)

December

December 2

Deadline for Meeting of Board of State Canvassers to Certify General Election Results

(on or before the 30th day after election)

N.J.S.A. 19:21-1

December 4

Deadline for Filing of Election Contest Petitions for General Election

(not later than 32 days after election)

N.J.S.A. 19:29-3

December 7

Municipal Non-Partisan Run-Off Election

(Tuesday next after the first Monday in December)

N.J.S.A. 40:45-19

EXHIBIT B

02/24/2021

Voter Summary
Hudson County

Generated by [REDACTED]
Page 1 of 3

SELECTION CRITERIA

Requested For: JIM FARINA

If no selection is displayed, everything is selected.

Voter Status: Active, Active Need ID, Active Federal Election Only, Active Federal Election Only Need ID, Pending, Pending Need ID, Pending-17, Pending-17 Need ID, Inactive Confirmation, Inactive Confirmation Need ID

Voting District: Hoboken City - 01 - 01, Hoboken City - 01 - 02, Hoboken City - 01 - 03, Hoboken City - 01 - 04, Hoboken City - 01 - 05, Hoboken City - 01 - 06, Hoboken City - 02 - 01, Hoboken City - 02 - 02, Hoboken City - 02 - 03, Hoboken City - 02 - 04, Hoboken City - 02 - 05, Hoboken City - 02 - 06, Hoboken City - 03 - 01, Hoboken City - 03 - 02, Hoboken City - 03 - 03, Hoboken City - 03 - 04, Hoboken City - 03 - 05, Hoboken City - 03 - 06, Hoboken City - 03 - 07, Hoboken City - 04 - 01, Hoboken City - 04 - 02, Hoboken City - 04 - 03, Hoboken City - 04 - 04, Hoboken City - 04 - 05, Hoboken City - 04 - 06, Hoboken City - 04 - 07, Hoboken City - 05 - 01, Hoboken City - 05 - 02, Hoboken City - 05 - 03, Hoboken City - 05 - 04, Hoboken City - 05 - 05, Hoboken City - 05 - 06, Hoboken City - 05 - 07, Hoboken City - 06 - 01, Hoboken City - 06 - 02, Hoboken City - 06 - 03, Hoboken City - 06 - 04, Hoboken City - 06 - 05, Hoboken City - 06 - 06, Hoboken City - 06 - 07

Sort Option: Municipality

Municipality	Ward	District	UNA	DEM	REP	CNV	CON	GRE	LIB	NAT	RFP	SSP	Total
Hoboken City													
Hoboken City	01	01	257	347	82	1	0	0	1	0	0	0	688
Hoboken City	01	02	550	761	198	2	2	1	1	0	0	0	1515
Hoboken City	01	03	290	246	78	1	0	0	4	0	0	0	619
Hoboken City	01	04	306	407	109	0	0	2	5	2	0	0	831
Hoboken City	01	05	523	457	186	2	0	0	6	0	0	0	1174
Hoboken City	01	06	595	623	232	3	1	2	4	0	1	0	1461
Ward 01 - Sub Total:			2521	2841	885	9	3	5	21	2	1	0	6288
Hoboken City	02	01	447	612	182	2	1	2	6	1	0	0	1253
Hoboken City	02	02	585	485	252	2	0	0	3	0	0	0	1327
Hoboken City	02	03	358	518	132	2	0	4	4	0	0	0	1018
Hoboken City	02	04	434	566	156	2	2	1	6	2	1	0	1170
Hoboken City	02	05	500	433	200	1	0	0	1	0	0	0	1135
Hoboken City	02	06	1013	832	534	0	0	0	6	0	1	0	2386
Ward 02 - Sub Total:			3337	3446	1456	9	3	7	26	3	2	0	8289
Hoboken City	03	01	347	476	135	1	1	1	4	0	0	1	966
Hoboken City	03	02	338	524	145	0	1	1	5	0	1	0	1015
Hoboken City	03	03	309	496	123	0	2	0	3	0	0	1	934
Hoboken City	03	04	425	578	165	2	1	2	5	0	0	0	1178
Hoboken City	03	05	493	486	223	1	2	0	5	1	0	0	1211
Hoboken City	03	06	454	542	158	1	1	1	2	0	0	0	1159
Hoboken City	03	07	389	439	161	1	1	1	8	0	0	2	1002
Ward 03 - Sub Total:			2755	3541	1110	6	9	6	32	1	1	4	7465
Hoboken City	04	01	460	396	155	2	1	2	5	0	0	1	1022
Hoboken City	04	02	401	472	157	1	2	0	2	0	0	0	1035
Hoboken City	04	03	322	621	67	6	3	2	3	1	2	1	1028
Hoboken City	04	04	298	607	73	3	3	2	2	0	0	2	990
Hoboken City	04	05	356	374	116	3	2	0	6	0	0	1	858
Hoboken City	04	06	352	521	139	0	1	1	5	0	0	1	1020
Hoboken City	04	07	369	643	148	2	1	4	4	0	1	1	1173
Ward 04 - Sub Total:			2558	3634	855	17	13	11	27	1	3	7	7126
Hoboken City	05	01	262	359	90	1	0	0	3	0	0	0	715
Total for Hoboken City:			16389	19945	6432	55	37	47	162	9	9	15	43100
Grand Total:			16389	19945	6432	55	37	47	162	9	9	15	43100

Municipality	Ward	District	UNA	DEM	REP	CNV	CON	GRE	LIB	NAT	RFP	SSP	Total
Hoboken City	05	02	248	341	94	1	1	0	2	0	0	0	687
Hoboken City	05	03	270	414	130	1	0	1	2	0	0	1	819
Hoboken City	05	04	253	352	89	0	0	2	2	0	0	0	698
Hoboken City	05	05	252	345	108	2	1	3	3	0	1	0	715
Hoboken City	05	06	952	1035	403	2	0	3	7	1	1	0	2404
Hoboken City	05	07	729	840	344	2	1	1	9	0	0	0	1926
Ward 05 - Sub Total:			2966	3686	1258	9	3	10	28	1	2	1	7964
Hoboken City	06	01	297	326	100	1	0	2	3	1	0	1	731
Hoboken City	06	02	180	72	39	0	0	0	0	0	0	0	291
Hoboken City	06	03	295	388	109	0	0	1	6	0	0	0	799
Hoboken City	06	04	234	448	127	1	3	1	1	0	0	0	815
Hoboken City	06	05	317	419	117	0	1	1	2	0	0	0	857
Hoboken City	06	06	581	720	224	3	1	3	9	0	0	2	1543
Hoboken City	06	07	348	424	152	0	1	0	7	0	0	0	932
Ward 06 - Sub Total:			2252	2797	868	5	6	8	28	1	0	3	5968
Total for Hoboken City:			16389	19945	6432	55	37	47	162	9	9	15	43100
Grand Total:			16389	19945	6432	55	37	47	162	9	9	15	43100

Party:

- UNA Unaffiliated
- DEM Democratic*
- REP Republican*
- GRE Green Party
- LIB Libertarian Party
- RFP Reform Party
- CON U.S. Constitution Party
- NAT Natural Law Party
- CNV Conservative Party
- SSP Socialist Party
- N/A Not Available

1202 0 8 9N
AUG 0 3 2021
AUG 0 3 2021

43,100

600

431

201 942
9320

01

EXHIBIT C

City Clerk

From: City Clerk
Sent: Friday, September 3, 2021 5:32 PM
To: ian@hobokengolf.com
Cc: Jerry Lore; Brian Aloia; Alyssa Wells; Justin Halwagy
Subject: Petitions filed in City Clerk's office this past Monday, August 30th
Attachments: sample letter to candidate for defective petitions filed in the City Clerks office for Municipal Non-Partisan election - Ian Rintel.pdf

Importance: High

Dear Mr. Rintel,

Please see the attached letter regarding the petitions you filed on Monday, August 30th.

Thank you.

Sincerely,

James Farina

Hoboken City Clerk
94 Washington St.
Hoboken, NJ 07030
201 420 2000 ext. 2009
cityclerk@hobokennj.gov

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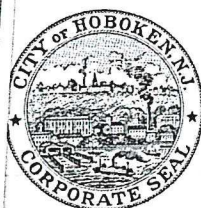
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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

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mailed on 9/3/21

Postage paid to:
Ian Rintel
 Apt. No. *11*
 PO Box No.
 City, State, ZIP+4
Hoboken

Form 3800, August 2006 See Reverse for Instructions



CITY CLERK'S OFFICE
CITY OF HOBOKEN
WASHINGTON STREET
HOBOKEN, NEW JERSEY 07030
(201) 420-2000 Ext. 2009
AMES J. FARINA
CITY CLERK

Friday, September 3, 2021

Ian Rintel
 11 Elysian Park Apt.#1
 Hoboken, NJ 07030

Re: Council at Large petitions filed in the City Clerk's office for November 2, 2021
 General election

Dear Candidate,

On Friday, September 3, 2021, the City Clerk's office received about 409 petitions from you.

My office has conducted a thorough review of your petitions and found some defects which did not conform and we are retaining the defective petitions in my office.

Please come into my office as soon as possible to rectify these defective petitions. Thank you.

Very truly yours,

James J. Farina
 Hoboken Municipal Clerk

cc: Brian Aloia, Corporation Counsel
 Alyssa Wells, Assistant Corporation Counsel
 Jerry Lore, Deputy Clerk

City Clerk

From: City Clerk
Sent: Friday, September 3, 2021 5:34 PM
To: mannysoler2016@yahoo.com
Cc: Jerry Lore; Brian Aloia; Alyssa Wells; Justin Halwagy
Subject: Petitions filed in City Clerk's office this past Monday, August 30th
Attachments: sample letter to candidate for defective petitions filed in the City Clerks office for Municipal Non-Partisan election - Manny Rivera.pdf

Importance: High

Dear Mr. Rivera,

Please see the attached letter regarding the petitions you filed on Monday, August 30th.

Thank you.

Sincerely,

James Farina

Hoboken City Clerk
94 Washington St.
Hoboken, NJ 07030
201 420 2000 ext. 2009
cityclerk@hobokennj.gov



**MUNICIPAL CLERK'S OFFICE
CITY OF HOBOKEN
94 WASHINGTON STREET
HOBOKEN, NEW JERSEY 07030
(201) 420-2000 Ext. 2009
JAMES J. FARINA
CITY CLERK**

Friday, September 3, 2021

Manuel Rivera
529 Park Ave. Apt. 3
Hoboken, NJ 07030

Re: Council at Large petitions filed in the City Clerk's office for November 2, 2021
General election

Dear Candidate,

On Friday, September 3, 2021, the City Clerk's office received about 409 petitions from you.

My office has conducted a thorough review of your petitions and found some defects which did not conform and we are retaining the defective petitions in my office.

Please come into my office as soon as possible to rectify these defective petitions. Thank you.

Very truly yours,

James J. Farina
Hoboken Municipal Clerk

cc: Brian Aloia, Corporation Counsel
Alyssa Wells, Assistant Corporation Counsel
Jerry Lore, Deputy Clerk

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Total Postage & Fees	\$

Michael Kravitz
Postmark
Here
mclde
on c

Sent To Manuel Rivera
Street, Apt. No.,
or PO Box No. 529 Park
City, State, ZIP+4 Hoboken NJ

PS Form 3800, August 2006 See Reverse for Instructions

7009 2250 0002 1637 1644 EE9T 2000 0522 6001

City Clerk

From: City Clerk
Sent: Friday, September 3, 2021 5:36 PM
To: cinlgold@gmail.com
Cc: Jerry Lore; Brian Aloia; Alyssa Wells; Justin Halwagy
Subject: Petitions filed in City Clerk's office this past Monday, August 30th
Attachments: sample letter to candidate for defective petitions filed in the City Clerks office for Municipal Non-Partisan election - Cindy Wiegand.pdf

Importance: High

Dear Mrs. Wiegand,

Please see the attached letter regarding the petitions you filed on Monday, August 30th.

Thank you.

Sincerely,

James Farina

Hoboken City Clerk
94 Washington St.
Hoboken, NJ 07030
201 420 2000 ext. 2009
cityclerk@hobokennj.gov



MUNICIPAL CLERK
CITY OF HOBOKEN
94 WASHINGTON STREET
HOBOKEN, NEW JERSEY 07030
(201) 420-2000 Ex 2018
JAMES J. FARINA
CITY CLERK

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☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$
Postage \$
Total Postage and Fees \$
Sent To Cindy Wiegand
Street and Apt. No. or PO Box No. 912 Castle Point Terrace
City, State, ZIP+4® Hoboken, NJ 07030

Postmark Here
9/3/21

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Friday, September 3, 2021

Cindy Wiegand
912 Castle Point Terrace
Hoboken, NJ 07030

Re: Council at Large petitions filed in the City Clerk's office for November 2, 2021
General election

Dear Candidate,

On Friday, September 3, 2021, the City Clerk's office received about 421 petitions from you.

My office has conducted a thorough review of your petitions and found some defects which did not conform and we are retaining the defective petitions in my office.

Please come into my office as soon as possible to rectify these defective petitions. Thank you.

Very truly yours,

James J. Farina
Hoboken Municipal Clerk

cc: Brian Aloia, Corporation Counsel
Alyssa Wells, Assistant Corporation Counsel
Jerry Lore, Deputy Clerk

EXHIBIT D

COPY



September 8, 2021

Dear City Clerk,

Please accept this correspondence as a formal challenge to the nominating petitions submitted by the following candidates: (1) Cindy Weigand, (2) Ian Rintel and (3) Manny Rivera. Listed below are residents that have signed petitions for at least four (4) City Council candidates, exceeding the amount as permitted by City law, thereby invalidating these signatures on any and all petitions.

Elizabeth Abraham
Jonathan Abraham
Joan Allman
Gail Blake
Theresa Castellano
Pasquale Colanero
Rafael Cordova
Vincent Crysler
Isabel Dumois
Arvin Figueroa
Marisa Giorgi
Bernadette Henson
Julia Knight
Samantha Lenore
Sergio Leyva
Jane McConnell
Robert Meyers
Jaye Mize
Marisol Montalvo
Rajeev Nath
Elizabeth Ndoye
Eytan Noy
Sivan Noy
Migdalia Pagan-Milano
Maria Pepe

RECEIVED
2021 SEP -8 AM 3:41
CITY CLERK
HOBOKEN, NJ 07030

Miriam Pinchevsky
Arcadio Ramos
Maria Ravenna
Cosmo Sancilio
Donna Schiller
Allison Seife
Jacqueline Stasium

Further, the nominating petitions for City Council candidates requires signatories affirm that they are registered voters of the municipality of the City of Hoboken. In order to confirm that signatories are, in fact, registered voters in Hoboken, the City Clerk must verify individual signatories' name and address. If no address is provided on the petition, verification of the signatory's registration status is impossible. Accordingly, any petition without the signatory's address is invalid.

Similarly, nominating petitions must also include the name and address of the candidate seeking office. Both name and address must be included so potential signatories can verify the identity of the candidate for whom they are signing the petition. The dual verification method safeguards the integrity of the nominating process by preventing misrepresentation when soliciting signatures. In other words, it prevents someone from representing they are seeking signatures for one individual, while actually seeking signatures for someone else. Therefore, any nominating petition that does not include the candidate's address is invalid.


Listed below are invalid petitions because no address is listed for either the signatory or the candidate seeking nomination.

Petitions signed for Cindy Weigand:

Own McAnuff: no candidate address
Maureen Schnabolk: no voter address listed
Eric Schnabolk: no voter address listed
John Cores, Jr: no voter address listed
Anthony Corea, II: no voter address listed
Danielle Gizzo: no voter address listed
Bryan Kelly: no candidate address listed
Karen Kelly: no candidate address listed
Michael Dura: no candidate address listed
Andrew Chernicoff: no candidate address listed

Please do not hesitate to contact me at 917-485-1126 if you have any questions or concerns.

Sincerely,



Vijay Chaudhuri
Campaign Manager, Team Bhalla

EXHIBIT E

City Clerk

From: City Clerk
Sent: Friday, September 3, 2021 5:43 PM
To: Ian Rintel
Subject: RE: Petitions filed in City Clerk's office this past Monday, August 30th

Mr. Rintel,

We were able to certify 409 out of all the petitions you filed and yes we are off on Monday, Labor Day

We will be open Tuesday, September 7th 9-4 PM.

Sincerely,

James Farina

Hoboken City Clerk
94 Washington St.
Hoboken, NJ 07030
201 420 2000 ext. 2005
cityclerk@hobokennj.gov

From: Ian Rintel <irintel@gmail.com>
Sent: Friday, September 3, 2021 5:39 PM
To: City Clerk <cityclerk@hobokennj.gov>
Subject: Re: Petitions filed in City Clerk's office this past Monday, August 30th

When is the next date that your office is open? I presume you are closed Labor Day?

In your letter are you stating approximately 409 petitions are accepted and the remaining approximately 100 were not? Or are you stating you are only in receipt of 409 (rather than the 509 I counted)?

Regards,

Ian

On Fri, Sep 3, 2021 at 5:31 PM City Clerk <cityclerk@hobokennj.gov> wrote:

Dear Mr. Rintel,

Please see the attached letter regarding the petitions you filed on Monday, August 30th.

Thank you.

Sincerely,

James Farina

Hoboken City Clerk

94 Washington St.

Hoboken, NJ 07030

201 420 2000 ext. 2009

cityclerk@hobokennj.gov

Jerry Lore

From: Ian Rintel <irintel@gmail.com>
Sent: Wednesday, September 08, 2021 7:04 PM
To: Jerry Lore
Subject: Re: Petitions filed in City Clerk's office this past Monday, August 30th

There isn't a way for me to contact petitioners until sundown tonight. I don't know if they are Jewish or how religious they are, and this is supposed to be a serious holiday with no phone/text/etc.

I'll do my best, but this is a very short time to do something that is pretty hard to do. I'd need to find at least 22 of around 100.

I'm going to appeal to the county and governors office- I don't think electronic petitions should have been excluded here. It certainly was necessary considering how many people refused to sign petitions on the basis of COVID-19. I'm sure you and the city would not want to disenfranchise voters or limit their choices this election. There were many more than 22 registered Hoboken voters who would have signed for me if they were comfortable touching my pen and the form- not to mention that without COVID: entering apartment buildings and knocking on doors would have made my task significantly easier.

Regards-

On Wed, Sep 8, 2021 at 3:24 PM Jerry Lore <j.lore@hobokennj.gov> wrote:

Mr. Rintel,

Happy Rosh Hashanah (Hebrew: ראש השנה).

Just wanted to remind you that if you are able to rectify/amend those defective petitions, please have them done before the end of the day 4PM tomorrow.

Thank you.




Jerry Lore
Deputy City Clerk
o:201-420-2000, ext. 2008

f: 201-420-2085

m: 201-726-9112

j.lore@hobokennj.gov

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From: City Clerk <cityclerk@hobokennj.gov>

Sent: Friday, September 03, 2021 5:32 PM

To: ian@hobokengolf.com

Cc: Jerry Lore <j.lore@hobokennj.gov>; Brian Aloia <baloia@hobokennj.gov>; Alyssa Wells <AlyssaW@hobokennj.gov>; Justin Halwagy <JHalwagy@hobokennj.gov>

Subject: Petitions filed in City Clerk's office this past Monday, August 30th

Importance: High

Dear Mr. Rintel,

Please see the attached letter regarding the petitions you filed on Monday, August 30th.

Thank you.

Sincerely,

James Farina

Jerry Lore

To: Ian Rintel
Subject: RE: Petitions filed in City Clerk's office this past Monday, August 30th

Ian,


I have forwarded your response to our Corporation Counsel's office, if you have any legal questions/concerns, please feel free to contact them at 201-420-2000 ext. 1203

Best,

JL



Jerry Lore
Deputy City Clerk
o: 201-420-2000, ext. 2008
f: 201-420-2085
m: 201-726-9112
j.lore@hobokennj.gov

 Please consider the environment before printing this email.

The information contained in this message is intended only for the person addressed in the email. Please be aware that any dissemination or copying of this communication is strictly prohibited. Any documents attached may contain confidential information that is legally privileged and/or exempt from the open public records act. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient and you have received this communication in error, please immediately notify me by replying to the message and deleting the original message along with the attachments.

From: Ian Rintel <irintel@gmail.com>
Sent: Wednesday, September 08, 2021 7:04 PM
To: Jerry Lore <j.lore@hobokennj.gov>
Subject: Re: Petitions filed in City Clerk's office this past Monday, August 30th

There isn't a way for me to contact petitioners until sundown tonight. I don't know if they are Jewish or how religious they are, and this is supposed to be a serious holiday with no phone/text/etc.

I'll do my best, but this is a very short time to do something that is pretty hard to do. I'd need to find at least 22 of around 100.

I'm going to appeal to the county and governors office- I don't think electronic petitions should have been excluded here. It certainly was necessary considering how many people refused to sign petitions on the basis of COVID-19. I'm sure you and the city would not want to disenfranchise voters or limit their choices this election. There were many more than 22 registered Hoboken voters who would have signed for me if they were comfortable touching my pen and the form- not to mention that without COVID: entering apartment buildings and knocking on doors would have made my task significantly easier.

Regards-

Hoboken City Clerk

94 Washington St.

Hoboken, NJ 07030

201 420 2000 ext. 2009

cityclerk@hobokennj.gov

Jerry Lore

Jerry

From: Ian Rintel <irintel@gmail.com>
Sent: Thursday, September 09, 2021 4:07 PM
To: City Clerk
Cc: Brian Aloia; Justin Halwagy; Alyssa Wells; Jerry Lore
Subject: Re: Defective petitions for Mr. Rintel
Attachments: demand to accept petitions per NJ statute.pdf

✓

This was done incorrectly. Thus - by statute, all candidates who submitted 431+ ballots will need to be on the ballot.

I'm attaching my demand which also contains the corresponding state statute.
I've already sent this to you and Corporation Counsel by certified mail.
I would appreciate a positive response right away: I need to start campaigning in earnest.

I'm unsure what your motivation is to keep candidates off the ballot - it seems very undemocratic.

As this is a 'reply to' - I'll also send this individually to the parties shown in my message.

PDF Attached:

Ian Rintel

On Thu, Sep 9, 2021 at 4:01 PM City Clerk <cityclerk@hobokennj.gov> wrote:

Mr. Rintel,

As you know today was the deadline for curing the defective petition(s) and you were unable to cure them today.

Unfortunately we cannot place you on the ballot since you were short to meet the threshold of meeting the required amount of petitions.

Please be guided accordingly.

Sincerely,

Hoboken City Clerk

94 Washington St.

Hoboken, NJ 07030

201 420 2000 ext. 2009

cityclerk@hobokennj.gov

September 9th, 2021

Dear City Clerk & Corporation Council,

On 8/30/2021, by 4 pm - I filed 509 candidate petitions for city council. All were in apparent conformity. By statute, 9/3/2021 was the absolute last day for objections to candidate petitions. No objection was filed in time nor was any letter received by this deadline from anyone. It is now too late to file such an objection. I'm in possession of a letter dated September 8th from the Mayor's team challenging certain petitions: but it is too late for such an objection.

NJSA 19:13-10 Objection to petition

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.

I demand that all candidates that submitted at least 431 petitions for city council be placed on the ballot as the time for objections has passed. Any petitions returned to candidates by the city clerk which were complete (no missing information) should be considered valid - the city clerk does not have a current voter roll so even if it were the city clerk's job to compare petitions to voter rolls - it can't be done: voter rolls will not be updated until much closer to election day. Even if it were possible for the city clerk to reject petitions and even if the city clerk had the means to do so - the time had already expired prior to the city clerk sending anything to candidates.

It is too late. Put all candidates on the ballot and let's have a fair, honest and positive election for the sake of the City of Hoboken.

Regards,

Ian Rintel - Candidate

cc: Junior Maldonado, Andrew J. Bruck, Pauline D. Daniels, Bob Cosgrove

City Clerk

From: City Clerk
Sent: Thursday, September 9, 2021 4:01 PM
To: Ian Rintel
Cc: Brian Aloia; Justin Halwagy; Alyssa Wells; Jerry Lore
Subject: Defective petitions for Mr. Rintel

Importance: High

Mr. Rintel,

As you know today was the deadline for curing the defective petition(s) and you were unable to cure them today.

Unfortunately we cannot place you on the ballot since you were short to meet the threshold of meeting the required amount of petitions.

Please be guided accordingly.

Sincerely,

Hoboken City Clerk
94 Washington St.
Hoboken, NJ 07030
201 420 2000 ext. 2009
cityclerk@hobokennj.gov

EXHIBIT F

Alyssa Wells

From: City Clerk
Sent: Thursday, September 9, 2021 11:55 AM
To: mannysoler2016@yahoo.com
Cc: Jerry Lore; Brian Aloia; Justin Halwagy; Alyssa Wells
Subject: defective petitions for Manny Rivera

Importance: High

Mr. Rivera,

We gave back forty five (45) defective petitions on Tuesday, September 7th for you to cure them.

As you know you are short twenty-two (22) and have till the end of the day to cure them.

Thank you.

Sincerely,

Hoboken City Clerk
94 Washington St.
Hoboken, NJ 07030
201 420 2000 ext. 2009
cityclerk@hobokennj.gov

Alyssa Wells

From: City Clerk
Sent: Thursday, September 9, 2021 3:53 PM
To: Brian Aloia; Justin Halwagy; Alyssa Wells
Cc: Jerry Lore
Subject: FW: nominating petition councilperson-at-large, City of Hoboken

Importance: High

Corporation Counsel's office,

FYI...

Sincerely,

Hoboken City Clerk
94 Washington St.
Hoboken, NJ 07030
201 420 2000 ext. 2009
cityclerk@hobokennj.gov

From: Manuel Rivera <mannyrivera2021@yahoo.com>
Sent: Thursday, September 9, 2021 3:47 PM
To: City Clerk <cityclerk@hobokennj.gov>
Subject: nominating petition councilperson-at-large, City of Hoboken

City Clerk
Municipal Clerk: James J, Farina, RMC
Municipal Deputy Clerk: Jerry Lore, RMC

Sept. 9, 2021

The present email is to notify you that due to the time and date September 8th, 2021, when I was made aware that the nominating petition for councilperson at large needed to be cured and returned by today September 9th, 2021 at or before 4 pm. it became clear it would be unlikely I could cure them in time.

So it is with great sadness., I must inform you that., I am unable to cure this nominating petition the time deadline of today at 4 pm.

Sincerely,
Manny Rivera.