

VINCE A. SICARI, ESQ. Id#020151996
ATTORNEY AT LAW, LLC
Post Office Box 9157
Paramus, New Jersey 07653-9157
Telephone: 201.261.3345
Email: VinceSicariLaw@aol.com
Attorney for Plaintiff

**Nature's Touch Med NJ, LLC d/b/a
Nature's Touch**

Plaintiff

versus

**City of Hoboken, City of Hoboken as
Respondeat Superior for Mayor Ravinder
Singh Bhalla, Ravinder Singh Bhalla
(individually), Steven Fulop (individually),
Jaelyn Thompson (individually), John
Does 1 through 5 (fictitious named parties
to potentially be identified at a later time).**

Defendants.

**NEW JERSEY SUPERIOR COURT
HUDSON COUNTY VICINAGE
CIVIL PART**

DOCKET NUMBER:

VERIFIED COMPLAINT

UNDISPUTED STATEMENT OF FACTS

1. Nature's Touch Med NJ LLC (hereinafter "Nature's Touch), is a limited liability company formed on or about August 5, 2019 with a principal address of 10 Orchard Road, Demarest, New Jersey 07627.
2. Amy Sausa is the registered agent for Nature's Touch LLC and serves in the capacity of Owner/Secretary with the company.
3. Nature's Touch is a woman-owned company with three owners, to wit: Maria Sausa a thirty three and a third percent owner; Amy Sausa and thirty three and a third percent owner; and Jennifer Doherty a thirty three and a third percent owner.

4. Nature's Touch received a medical dispensary license award in connection with the 2019 Medical RFA.
5. Nature's Touch LLC sought to establish a medical marijuana dispensary in the City of Hoboken.
6. Nature's Touch followed all the necessary process and procedures in their filing of the medical marijuana dispensary application with the City of Hoboken.
7. The City of Hoboken accepted the Nature's Touch application and processed the same in the ordinary course of its business.
8. Nature's Touch secured a Letter of Intent on December 28, 2021 with a Building Owner/Landlord, Pal Park Boys LLC, for a lease at 1014 Washington Street in the City of Hoboken.
9. The Letter of Intent referenced in paragraph eight above was provided to the City of Hoboken as part of the application process and is available for production in discovery.
10. The Building Owner/Landlord, Pal Park Boys LLC, was at all times aware the intended use of the premises associated with medical retail of cannabis in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq.
11. There was a parking plan for the 1014 Washington Street location leaving City of Hoboken board approval as the only open issue.
12. The parking plan referenced in paragraph eleven above was provided to the City of Hoboken as part of the application process and is available for production in discovery.
13. At the time Nature's Touch LLC sought to secure the location, there were a total of ZERO medical dispensaries in the City of Hoboken.

14. Nature's Touch application and submissions were made by their legal counsel, Eric D. Reiser, Esq., of Shapiro Crowland, LLP, who is fully familiar with the process and procedures for submitting medical and recreational marijuana dispensary applications.
15. At all relevant times mentioned herein, Mr. Reiser prepared the application materials and submitted the same on behalf of the owners of Nature's Touch.
16. Nature's Touch LLC through it's attorney submitted a two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
17. The checks referenced in paragraph sixteen above were provided to the City of Hoboken as part of the application process, are part of a public and business record and can be made available for production in discovery.
18. Mr. Reiser secured a draft of the lease for the 1014 Washington Street location from the landlord prior to the City of Hoboken approval hearing.
19. The lease referenced in paragraph eighteen above was provided to the City of Hoboken as part of the application process and is available for production in discovery.
20. The lease terms included a ten year term with a five year option.
21. The annual lease amount was \$102,000.00 with three percent annual increases with a four month security deposit and two year guarantee.
22. The lease commencement date was January 2022.
23. Pal Park Boys, LLC care of The Alexander Group NJ, LLC can confirm all lease terms at the time if trial.
24. Corrado Belgiovine, the property manager and broker for the Alexander Group NJ can confirm all the lease terms and conditions at the time of trial.
25. At all relative times mentioned herein, Patricia Carcone, Hoboken Zoning Department

Planning Board Secretary, was aware of the application submitted by Nature's Touch.

26. Pantaleo Pellegrini is a resident of the City of Hoboken, Hudson County, New Jersey and was the Director of the Department of Health and Human Services of the City of Hoboken until May 3, 2023, and the Director of the Department of Environmental Services until June 2018.
27. At all relevant times mentioned herein, Ravinder Singh Bhalla is/was the duly elected Mayor of the City of Hoboken, New Jersey.
28. At all relevant times mentioned herein, Ravinder Singh Bhalla is/was licensed to practice law in the State of New Jersey and operates a solo law practice.
29. The City of Hoboken Cannabis Review Board scheduled a hearing for the license application on January 7, 2021 at four o'clock in the afternoon via zoom, which consisted of Councilmen Michael Russo, Jason Freeman and Director of Health and Human Services, Pantaleo Pellegrini.
30. The City of Hoboken Cannabis Review Board unanimously approved the application by Nature's Touch.
31. The hearing referenced in paragraph thirty above was conducted via zoom and a recording and/or transcript of the same exists and the same is subject to FOIA (Freedom of Information Act) production and the same should be made available for production in discovery and at the time of trial.
32. On January 8, 2022, the award to Nature's Touch was reported in the local news, to wit, the Hudson County Review.
33. The news article referenced in paragraph thirty two is a matter of public record and the same shall be made available for production in discovery and at the time of trial.

34. On or about January 10, 2022, City of Hoboken Mayor Ravinder Singh Bhalla (hereinafter also “Mayor Bhalla”) refused to sign the letter of approval for Nature’s Touch marijuana dispensary license.
35. On or about January 14, 2022, during a lunch meeting with Mayor Bhalla, Vijay Chaudhuri (Mayor Bhalla’s Chief of Staff), Councilman Jason Freeman, John Allen, Esq. (Corporate Counsel), Pantaleo Pellegrini, Mayor Bhalla said that he received a phone call from Mayor Fulop of Jersey City and that Mayor Fulop was extremely upset and very angry that the Cannabis Board awarded to Nature’s Touch the license at said Washington Street location.
36. The statement made in paragraph thirty five above is part of a certification made by Pantaleo Pellegrini who has filed suit against the City of Hoboken, has whistle blower status and will be called to affirm the certified statement during discovery and at the time of trial.
37. At the meeting referred to in paragraph thirty five above, Mayor Bhalla said he was quashing the award to Nature’s Touch because Mayor Fulop’s wife was going to get the medicinal cannabis retail location on 14th Street in Hoboken.
38. The statement made in paragraph thirty seven above is part of a certification made by Pantaleo Pellegrini who has filed suit against the City of Hoboken, has whistle blower status and will be called to affirm the certified statement during discovery and at the time of trial.
39. Mayor Bhalla reiterated at the January 14, 2022 lunch meeting referenced in paragraphs thirty five and thirty seven above herein, that he was going to quash the award to Nature’s Touch and explained that in exchange, Mayor Fulop promised Mayor Bhalla that he would give Mayor Bhalla’s law firm contract work.
40. The statement made in paragraph thirty nine five above is part of a certification made by Pantaleo Pellegrini who has filed suit against the City of Hoboken, has whistle blower status

and will be called to affirm the certified statement during discovery and at the time of trial.

41. At all relevant times mentioned herein, “Mayor Fulop” is Steven M. Fulop, the Mayor of Jersey City, New Jersey.
42. At all relevant times mentioned herein, Steven M. Fulop is/was married to Jaclyn Thompson.
43. At all relevant times mentioned herein, Jaclyn Thompson, is a co-owner of Story Dispensary of Hoboken, LLC, which submitted an application to operate a cannabis retail operation in Hoboken, New Jersey.
44. On or about February 24, 2022, there was a meeting of the Cannabis Review Board to vote on Jaclyn Thompson’s application for the cannabis medicinal retail location on 14th Street in the City of Hoboken.
45. The statement made in paragraph forty four is part of a business record in the City of Hoboken and subject to FOIA (Freedom of Information Act) production and the same should be made available for production in discovery and at the time of trial.
46. The day prior to the meeting, Mayor Bhalla told Panteleo Pellegrini that he (the Mayor) needed the Cannabis Board to approve Mayor Fulop’s wife’s application.
47. The statement made in paragraph forty six above is part of a certification made by Pantaleo Pellegrini who has filed suit against the City of Hoboken, has whistle blower status and will be called to affirm the certified statement during discovery and at the time of trial.
48. In June of 2022, Mayor Bhalla made sure to fast track an expansion of a Cannabis license granted to Joseph Castiello to include recreational use.
49. The statement made in paragraph forty eight above is part of a certification made by Pantaleo Pellegrini who has filed suit against the City of Hoboken, has whistle blower status and will be called to affirm the certified statement during discovery and at the time of trial.

50. Mayor Bhalla forwarded three other applications to the Cannabis Review Board for approval which were not approved thanks to Pantaleo Pellegrini.
51. The statement made in paragraph fifty above is part of a certification made by Pantaleo Pellegrini who has filed suit against the City of Hoboken, has whistle blower status and will be called to affirm the certified statement during discovery and at the time of trial.
52. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Hoboken, who advised the Plaintiffs he would offer assistance to Nature's Touch to find out why Mayor Bhalla quashed the license.
52. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Jersey City.
53. It is presumed without facts to the contrary, Mr. Mondello was unable to get the answer due to the covert nature of Mayor Bhalla's actions.
54. The statement made in paragraph fifty three above is part of a certification made by Pantaleo Pellegrini who has filed suit against the City of Hoboken, has whistle blower status and will be called to affirm the certified statement during discovery and at the time of trial.
55. There was no plausible way for Nature's Touch to know why their application was quashed at the time the same occurred in January of 2022.
56. There was no plausible way for Nature's Touch to know their application was subject to the unethical and illegal actions of Mayor Bhalla and the tortious interference actions by Steven M. Fulop and Jaclyn Thompson prior to the filing of the complaint by Pantaleo Pelligrini.
57. The actions by Mayor Bhalla, Steven M. Fulop and Jaclyn Thompson were part of an undisclosed conspiracy which deprived Nature's Touch of a business operation.
58. Immediately upon discovery the actions referenced above herein, the City of Hoboken and

Ravinder Bhalla were placed on Title 59 Notice of Intent to Make Claim by certified mail return receipt dated May 14, 2024.

59. The return receipt proof of mailing were signed for by the City of Hoboken Clerk for both the City of Hoboken and Mayor Bhalla on May 17, 2024.
60. Thirty days has since passed and the Plaintiffs' counsel did not receive any acknowledgment of the Notice of Intent to Make Claim.

COUNT ONE

61. Nature's Touch Med NJ LLC (hereinafter "Nature's Touch), received a medical dispensary license award in connection with the 2019 Medical RFA.
62. Nature's Touch LLC sought to establish a medical marijuana dispensary in the City of Hoboken.
63. Nature's Touch followed all the necessary process and procedures in their filing of the medical marijuana dispensary application with the City of Hoboken.
64. The City of Hoboken accepted the Nature's Touch application and processed the same in the ordinary course of its business.
65. Nature's Touch secured a Letter of Intent on December 28, 2021 with a Building Owner/Landlord, Pal Park Boys LLC, for a lease at 1014 Washington Street in the City of Hoboken.
66. The Building Owner/Landlord, Pal Park Boys LLC, was at all times aware the intended use of the premises associated with medical retail of cannabis in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq.
67. There was a parking plan for the 1014 Washington Street location leaving City of Hoboken

board approval as the only open issue.

68. At the time Nature's Touch LLC sought to secure the location, there were a total of ZERO medical dispensaries in the City of Hoboken.
69. Nature's Touch application and submissions were made by their legal counsel, Eric D. Reiser, Esq., of Shapiro Crowland, LLP, who is fully familiar with the process and procedures for submitting medical and recreational marijuana dispensary applications.
70. At all relevant times mentioned herein, Mr. Reiser prepared the application materials and submitted the same on behalf of the owners of Nature's Touch.
71. Nature's Touch LLC through it's attorney submitted a two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
72. Mr. Reiser secured a draft of the lease for the 1014 Washington Street location from the landlord prior to the City of Hoboken approval hearing.
73. The lease terms included a ten year term with a five year option.
74. The annual lease amount was \$102,000.00 with three percent annual increases with a four month security deposit and two year guarantee.
75. The lease commencement date was January 2022.
76. At all relative times mentioned herein, Patricia Carcone, Hoboken Zoning Department Planning Board Secretary, was aware of the application submitted by Nature's Touch.
77. Pantaleo Pellegrini is a resident of the City of Hoboken, Hudson County, New Jersey and was the Director of the Department of Health and Human Services of the City of Hoboken until May 3, 2023, and the Director of the Department of Environmental Services until June 2018.

78. At all relevant times mentioned herein, Ravinder Singh Bhalla is/was the duly elected Mayor of the City of Hoboken, New Jersey.
79. The City of Hoboken Cannabis Review Board scheduled a hearing for the license application on January 7, 2021 at four o'clock in the afternoon via zoom, which consisted of Councilmen Michael Russo, Jason Freeman and Director of Health and Human Services, Pantaleo Pellegrini.
80. The City of Hoboken Cannabis Review Board unanimously approved the application by Nature's Touch.
81. On January 8, 2022, the award to Nature's Touch was reported in the local news, to wit, the Hudson County Review.
82. On or about January 10, 2022, City of Hoboken Mayor Ravinder Singh Bhalla (hereinafter also "Mayor Bhalla") refused to sign the letter of approval for Nature's Touch marijuana dispensary license.
83. On or about January 14, 2022, during a lunch meeting with Mayor Bhalla, Vijay Chaudhuri (Mayor Bhalla's Chief of Staff), Councilman Jason Freeman, John Allen, Esq. (Corporate Counsel), Pantaleo Pellegrini, Mayor Bhalla said that he received a phone call from Mayor Fulop of Jersey City and that Mayor Fulop was extremely upset and very angry that the Cannabis Board awarded to Nature's Touch the license at said Washington Street location.
84. At the meeting referred to in paragraph thirty five above, Mayor Bhalla said he was quashing the award to Nature's Touch because Mayor Fulop's wife was going to get the medicinal cannabis retail location on 14th Street in Hoboken.
85. Mayor Bhalla reiterated at the January 14, 2022 lunch meeting referenced in paragraphs thirty five and thirty seven above herein, that he was going to quash the award to Nature's

Touch and explained that in exchange, Mayor Fulop promised Mayor Bhalla that he would give Mayor Bhalla's law firm contract work.

86. New Jersey has established special defenses that allow immunity for public entities and public employees from being sued in certain circumstances, this is sometimes called "sovereign immunity" meaning the government entities are "immune" from certain claims and lawsuits from being filed against them.
87. Sovereign immunity means there are additional rules and notice requirements that must be filed in order to file a claim against a public entity.
88. Plaintiffs must be able to prove that the entity was not just negligent, but that their wrongful conduct that caused your injury was palpably unreasonable.
89. Under the Tort Claims Act, plaintiffs are required to file a Notice of Claim in 90 days from the date of your incident.
90. The incident in the matter before this court only became known as the result of the filing of a complaint dated and filed May 7, 2024.
91. The information which provides the facts and knowledge which occurred during the months of January and February 2022 could have never been known by the plaintiffs but for the filing of the complaint on May 7, 2022.
92. The requisite Notice of Intent to Make Claim was filed within ten days of said knowledge and notice by letter dated May 13, 2024 and received and acknowledged by the Defendant, City of Hoboken, and City of Hoboken May Bhalla on May 17, 2024.
93. The Title 59 Notice of Intent to Make Claim included and otherwise satisfied the statutory requirement by providing specific information the claim, specific information about the public entity or employee that caused your claim, details about how the accident happened,

the financial loss sustained, and sufficient details surrounding the claim in order to investigate the accident.

94. The plaintiffs have further satisfied the requirements of Title 59 allowing litigation to begin by providing the public entities and employees with notice of the name and address of the claimant, date, place and circumstances of the occurrence or transaction giving rise to the claim asserted, a general description of the damage or loss incurred, the name of the public entities or employees causing the injury, damage or loss and the amount of damages claimed. (See, N.J.S.A. § 59:8-3 through 8).
95. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Hoboken, who advised the Plaintiffs he would offer assistance to Nature's Touch to find out why Mayor Bhalla quashed the license.
96. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Jersey City.
97. It is presumed without facts to the contrary, even Mr. Mondello was unable to get the answer due to the covert nature of Mayor Bhalla's actions.
98. Respondeat Superior is a legal doctrine in tort law that makes a master liable for the wrong of a servant, specifically, the doctrine making an employer or principal liable for the wrong of an employee or agent if it was committed within the scope of employment or agency *Perdue v. Mitchell*, 373 So. 2d 650 (1979)
99. As a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiffs were deprived of the award of the medical retail of cannabis license in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and

Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq. approved by the City of Hoboken at a public hearing.

100. As a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiff were deprived of being the ONLY such medical retail of cannabis license holder in the City of Hoboken at the time the license was approved.
101. As a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiff were deprived of operating their business at 1014 Washington Street for a lease term of no less than ten years with a five year option.
102. As a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiff were deprived of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified.
103. As a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiff were deprived of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, which include to a far lesser extent the two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
104. As a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of

Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiff were deprived of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified based upon the immediate start of business in accordance with the lease commencement date of January 2022.

105. The actions of Mayor Bhalla were in direct contrast and violation of protections afforded a public employee from liability for injury where such actions are "resulting from the exercise of judgment or discretion vested in him." (N.J.S.A. 59:3-2(a) see also *Burke v. Deiner*, 97 N.J. 465, 472-473 (1984); *Visidor Corporation v. Borough of Cliffside Park*, 48 N.J. 214, 221 (1966).
106. As a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, were in complete disregard of the plaintiffs as stated in N.J.S.A. 59:3-14, subsection (a): "[N]othing in this act shall exonerate a public employee from liability if it is established that his conduct was outside the scope of his employment, or constituted a crime, actual fraud, actual malice or willful misconduct." See also, *Burke v. Deiner*, supra, at 472-473.

WHEREFORE, Plaintiffs hereby demand judgment against the defendant, City of Hoboken, acting as respondeat superior for the actions of the City of Hoboken Mayor, Ravinder Singh Bhalla, jointly and severally, for the following relief:

- A. Compensatory damages;
- B. Punitive damages;
- C. Interest;

- D. Costs of Litigation;
- E. Attorneys Fees and Costs; and
- F. Such further relief as the Court deems equitable and just.

COUNT TWO

107. The Plaintiffs reassert and re-allege all paragraphs stated above as if set forth at length herein.
108. Ravinder Singh Bhalla, (hereinafter in this count “defendant Bhalla”) is a licensed New Jersey attorney admitted to the bar for the purposes of practicing law.
109. Upon information and belief, defendant Bhalla, lists his legal place of employment at Florio, Perrucci, Steinhardt & Fader, LLC.
110. At all relevant times mentioned herein, defendant Bhalla was made aware that the City of Hoboken Cannabis Review Board unanimously approved the application by Nature’s Touch.
111. On or about January 10, 2022, defendant Bhalla refused to sign the letter of approval for Nature’s Touch marijuana medical dispensary license.
112. On or about January 14, 2022, during a lunch meeting with defendant Bhalla, Vijay Chaudhuri (Mayor Bhalla’s Chief of Staff), Councilman Jason Freeman, John Allen, Esq. (Corporate Counsel), Pantaleo Pellegrini, Mayor Bhalla said that he received a phone call from Mayor Fulop of Jersey City and that Mayor Fulop was extremely upset and very angry that the Cannabis Board awarded to Nature’s Touch the license at said Washington Street location.
113. At the meeting referred to in paragraph one hundred twelve above, defendant Bhalla said he was quashing the award to Nature’s Touch because Mayor Fulop’s wife was going to get the medicinal cannabis retail location on 14th Street in Hoboken.

114. Defendant Bhalla reiterated at the January 14, 2022 lunch meeting referenced in paragraph one hundred twelve above herein, that he was going to quash the award to Nature's Touch and explained that in exchange, Mayor Fulop promised Mayor Bhalla that he would give Mayor Bhalla's law firm contract work.
115. At all relevant times mentioned herein, "Mayor Fulop" is Steven M. Fulop, the Mayor of Jersey City, New Jersey.
116. At all relevant times mentioned herein, Steven M. Fulop is/was married to Jaclyn Thompson.
117. At all relevant times mentioned herein, Jaclyn Thompson, is/was a co-owner of Story Dispensary of Hoboken, LLC, which submitted an application to operate a cannabis retail operation in Hoboken, New Jersey.
118. On or about February 24, 2022, there was a meeting of the Cannabis Review Board to vote on Jaclyn Thompson's application for the cannabis medicinal retail location on 14th Street in the City of Hoboken.
119. The day prior to the meeting, defendant Bhalla told Panteleo Pellegrini that he (the Mayor) needed the Cannabis Board to approve Mayor Fulop's wife's application.
120. In June of 2022, defendant Bhalla used his Mayoral capacity to make sure to fast track an expansion of a Cannabis license granted to Joseph Castiello to include recreational use.
121. There was no plausible way for Nature's Touch to know why their application was quashed at the time the same occurred in January of 2022.
122. There was no plausible way for Nature's Touch to know their application was subject to the unethical and illegal actions of Mayor Bhalla and the tortious interference actions by Steven M. Fulop and Jaclyn Thompson prior to the filing of the complaint by Pantaleo Pelligrini.
123. The actions by defendant Bhalla, Steven M. Fulop and Jaclyn Thompson were part of an

- undisclosed conspiracy which deprived Nature's Touch of a business operation.
124. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Hoboken, who advised the Plaintiffs he would offer assistance to Nature's Touch to find out why Mayor Bhalla quashed the license.
 125. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Jersey City.
 126. It is presumed without facts to the contrary, even Mr. Mondello was unable to get the answer due to the covert nature of Mayor Bhalla's actions.
 127. Quid pro quo means "something given or received for something else." (See Merriam Webster)
 128. The legal context given to quid pro quo as referred to in paragraph twenty seven above and in this count refers to something that is in fact illegal, such as if an individual agrees to give a government official a financial benefit in exchange for receiving a license that rightly should be given to another company.
 129. Defendant Bhalla, agreed to quash the plaintiffs license in favor of the license granted to Jaelyn Thompson, to gain financial favor and become enriched with her husband, Steven M. Fulop.
 130. As a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of the award of the medical retail of cannabis license in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq. approved by the City of Hoboken at a public hearing.

131. As a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of being the ONLY such medical retail of cannabis license holder in the City of Hoboken at the time the license was approved.
132. As a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of operating their business at 1014 Washington Street for a lease term of no less than ten years with a five year option.
133. As a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified.
134. As a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, which include to a far lesser extent the two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.

135. As a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified based upon the immediate start of business in accordance with the lease commencement date of January 2022.

WHEREFORE, Plaintiffs hereby demand judgment against the defendant, Ravinder Singh Bhalla, jointly and severally, for the following relief:

- A. Compensatory damages;
- B. Punitive damages;
- C. Interest;
- D. Costs of Litigation;
- E. Attorneys Fees and Costs; and
- F. Such further relief as the Court deems equitable and just.

COUNT THREE

136. The Plaintiffs reassert and re-allege all paragraphs stated above as if set forth at length herein.

137. At all relevant times mentioned herein, "Mayor Fulop" is Steven M. Fulop, the Mayor of Jersey City, New Jersey.

138. At all relevant times mentioned herein, Steven M. Fulop is/was married to Jaclyn Thompson.

139. At all relevant times mentioned herein, Jaclyn Thompson, became a co-owner of Story

Dispensary of Hoboken, LLC, which submitted an application to operate a cannabis retail operation in Hoboken, New Jersey.

140. On or about February 24, 2022, there was a meeting of the Cannabis Review Board to vote on Jaclyn Thompson's application for the cannabis medicinal retail location on 14th Street in the City of Hoboken.
141. The day prior to the meeting, Mayor Bhalla told Panteleo Pellegrini that he (the Mayor) needed the Cannabis Board to approve Mayor Fulop's wife's application.
142. At all relevant times mentioned herein, defendant Bhalla was made aware that the City of Hoboken Cannabis Review Board unanimously approved the application by Nature's Touch.
143. On or about January 10, 2022, defendant Bhalla refused to sign the letter of approval for Nature's Touch medical marijuana dispensary license.
144. On or about January 14, 2022, during a lunch meeting with defendant Bhalla, Vijay Chaudhuri (Mayor Bhalla's Chief of Staff), Councilman Jason Freeman, John Allen, Esq. (Corporate Counsel), Pantaleo Pellegrini, Mayor Bhalla said that he received a phone call from Mayor Fulop of Jersey City and that Mayor Fulop was extremely upset and very angry that the Cannabis Board awarded to Nature's Touch the license at said Washington Street location.
145. At the meeting referred to in paragraph one hundred forty four above, defendant Bhalla said he was quashing the award to Nature's Touch because Mayor Fulop's wife was going to get the medicinal cannabis retail location on 14th Street in Hoboken.
146. Defendant Bhalla reiterated at the January 14, 2022 lunch meeting referenced in paragraph one hundred twelve above herein, that he was going to quash the award to Nature's Touch and explained that in exchange, Mayor Fulop promised Mayor Bhalla that he would give

Mayor Bhalla's law firm contract work.

147. There was no plausible way for Nature's Touch to know why their application was quashed at the time the same occurred in January of 2022.
148. There was no plausible way for Nature's Touch to know their application was subject to the unethical and illegal actions of Mayor Bhalla and the tortious interference actions by Steven M. Fulop and Jaclyn Thompson prior to the filing of the complaint by Pantaleo Pelligrini.
149. The actions by defendant Bhalla, Steven M. Fulop and Jaclyn Thompson were part of an undisclosed conspiracy which deprived Nature's Touch of a business operation.
150. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Hoboken, who advised the Plaintiffs he would offer assistance to Nature's Touch to find out why Mayor Bhalla quashed the license.
151. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Jersey City.
152. It is presumed without facts to the contrary, even Mr. Mondello was unable to get the answer due to the covert nature of Mayor Bhalla's actions.
153. There are two types of tortious interference: tortious interference with contract and tortious interference with prospective economic advantage, both involve situations where one party does something to intentionally undermine another party's business transactions or relationships. The primary difference between the two is whether a contract exists.
154. Nature's Touch followed all the necessary process and procedures in their filing of the medical marijuana dispensary application with the City of Hoboken.
155. The City of Hoboken accepted the Nature's Touch application and processed the same in the ordinary course of its business.

156. Nature's Touch secured a Letter of Intent on December 28, 2021 with a Building Owner/Landlord, Pal Park Boys LLC, for a lease at 1014 Washington Street in the City of Hoboken.
157. The Building Owner/Landlord, Pal Park Boys LLC, was at all times aware the intended use of the premises associated with medical retail of cannabis in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq.
158. There was a parking plan for the 1014 Washington Street location leaving City of Hoboken board approval as the only open issue.
159. The parking plan referenced in paragraph eleven above was provided to the City of Hoboken as part of the application process and is available for production in discovery.
160. At the time Nature's Touch LLC sought to secure the location, there were a total of ZERO medical dispensaries in the City of Hoboken.
161. Nature's Touch application and submissions were made by their legal counsel, Eric D. Reiser, Esq., of Shapiro Crowland, LLP, who is fully familiar with the process and procedures for submitting medical and recreational marijuana dispensary applications.
162. At all relevant times mentioned herein, Mr. Reiser prepared the application materials and submitted the same on behalf of the owners of Nature's Touch.
163. Nature's Touch LLC through it's attorney submitted a two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
164. The checks referenced in paragraph sixteen above were provided to the City of Hoboken as part of the application process, are part of a public and business record and can be made available for production in discovery.

165. Mr. Reiser secured a draft of the lease for the 1014 Washington Street location from the landlord prior to the City of Hoboken approval hearing.
166. The lease terms included a ten year term with a five year option.
167. The annual lease amount was \$102,000.00 with three percent annual increases with a four month security deposit and two year guarantee.
168. The lease commencement date was January 2022.
169. Pal Park Boys, LLC care of The Alexander Group NJ, LLC can confirm all lease terms at the time if trial.
170. Corrado Belgiovine, the property manager and broker for the Alexander Group NJ will confirm all the lease terms and conditions at the time of trial.
171. At all relative times mentioned herein, Patricia Carcone, Hoboken Zoning Department Planning Board Secretary, was aware of the application submitted by Nature's Touch.
172. The City of Hoboken Cannabis Review Board scheduled a hearing for the license application on January 7, 2021 at four o'clock in the afternoon via zoom, which consisted of Councilmen Michael Russo, Jason Freeman and Director or Health and Human Services, Pantaleo Pellegrini.
173. The City of Hoboken Cannabis Review Board unanimously approved the application by Nature's Touch.
174. On January 8, 2022, the award to Nature's Touch was reported in the local news, to wit, the Hudson County Review.
175. On or about January 10, 2022, City of Hoboken Mayor Ravinder Singh Bhalla (hereinafter also "Mayor Bhalla") refused to sign the letter of approval for Nature's Touch marijuana dispensary license.

176. Tortious interference with a contract occurs when someone improperly causes a breach of contract between you and a third party, leading to damages to the plaintiff.
177. Tortious Interference with Prospective Economic Advantage is when a third party improperly interferes with a business relationship or an expected business transaction.
178. The plaintiffs were approved for the cannabis license; had a lease in place; and the defendants, Steven M. Fulop and Jaclyn Thompson, knew about the contract at the time of the alleged interference.
179. The defendants, Steven M. Fulop and Jaclyn Thompson, interfered intentionally for financial gain.
180. The interference by the defendants, Steven M. Fulop and Jaclyn Thompson, was improper.
181. The defendants' (Steven M. Fulop and Jaclyn Thompson) conduct led to a breach of the contract with the City of Hoboken and the plaintiffs.
182. Defendant Bhalla, agreed to quash the plaintiffs license in favor of the license granted to Jaclyn Thompson, to gain financial favor and become enriched with her husband, Steven M. Fulop.
183. As a direct and proximate cause of the actions of defendants Steven M. Fulop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of the award of the medical retail of cannabis license in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq. approved by the City of Hoboken at a public hearing.
184. As a direct and proximate cause of the actions of defendants Steven M. Fulop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro

quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of being the ONLY such medical retail of cannabis license holder in the City of Hoboken at the time the license was approved.

185. As a direct and proximate cause of the actions of defendants Steven M. Fullop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of operating their business at 1014 Washington Street for a lease term of no less than ten years with a five year option, by installing their business in its place.
186. As a direct and proximate cause of the actions of defendants Steven M. Fullop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, by installing their business and making said profits in place of the plaintiffs.
187. As a direct and proximate cause of the actions of defendants Steven M. Fullop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, which include to a far lesser extent the two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
188. As a direct and proximate cause of the actions of defendants Steven M. Fullop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro

quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified based upon the immediate start of business in accordance with the lease commencement date of January 2022, by installing their business in its place.

WHEREFORE, Plaintiffs hereby demand judgment against the defendants, Steven M. Fulop and Jaclyn Thompson, jointly and severally, for the following relief:

- A. Compensatory damages;
- B. Punitive damages;
- C. Interest;
- D. Costs of Litigation;
- E. Attorneys Fees and Costs; and
- F. Such further relief as the Court deems equitable and just.

COUNT FOUR

- 189. The Plaintiffs reassert and re-allege all paragraphs stated above as if set forth at length herein.
- 190. The City of Hoboken Cannabis Review Board unanimously approved the application by Nature's Touch.
- 191. On or about January 14, 2022, during a lunch meeting with Mayor Bhalla, Vijay Chaudhuri (Mayor Bhalla's Chief of Staff), Councilman Jason Freeman, John Allen, Esq. (Corporate Counsel), Pantaleo Pellegrini, Mayor Bhalla said that he received a phone call from Mayor Fulop of Jersey City and that Mayor Fulop was extremely upset and very angry that the Cannabis Board awarded to Nature's Touch the license at said Washington Street location.

192. At the meeting referred to in paragraph thirty five above, Mayor Bhalla said he was quashing the award to Nature's Touch because Mayor Fulop's wife was going to get the medicinal cannabis retail location on 14th Street in Hoboken.
193. Mayor Bhalla reiterated at the January 14, 2022 lunch meeting referenced in paragraphs thirty five and thirty seven above herein, that he was going to quash the award to Nature's Touch and explained that in exchange, Mayor Fulop promised Mayor Bhalla that he would give Mayor Bhalla's law firm contract work.
194. A co-conspirator is person (or persons) who collaborate(s) with others in planning or executing a plot or plan.
195. At all relevant times mentioned herein, Steven M. Fulop is/was married to Jaclyn Thompson.
195. At all relevant times mentioned herein, Jaclyn Thompson, became a co-owner of Story Dispensary of Hoboken, LLC, which submitted an application to operate a cannabis retail operation in Hoboken, New Jersey.
196. The day prior to the meeting, Mayor Bhalla told Panteleo Pellegrini that he (the Mayor) needed the Cannabis Board to approve Mayor Fulop's wife's application.
197. There was no plausible way for Nature's Touch to know why their application was quashed at the time the same occurred in January of 2022, nevertheless it was done so in an effort for Ravinder Singh Bhalla could conspire with Steven M. Fulop and Jaclyn Thompson for their mutual financial benefits and the financial detriment of the plaintiffs.
198. There was no plausible way for Nature's Touch to know their application was subject to the unethical and illegal actions of Ravinder Singh Bhalla in effort to conspire with Steven M. Fulop and Jaclyn Thompson for their mutual financial benefits and the financial detriment of the plaintiffs.

199. The actions by defendants Ravinder Singh Bhalla, Steven M. Fulop and Jaclyn Thompson were part of an undisclosed conspiracy which deprived Nature's Touch of a business operation.
200. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Hoboken, who advised the Plaintiffs he would offer assistance to Nature's Touch to find out why Mayor Bhalla quashed the license.
201. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Jersey City.
202. It is presumed without facts to the contrary, even Mr. Mondello was unable to get the answer due to the covert nature of Mayor Bhalla's actions.
203. Nature's Touch followed all the necessary process and procedures in their filing of the medical marijuana dispensary application with the City of Hoboken.
204. The City of Hoboken accepted the Nature's Touch application and processed the same in the ordinary course of its business.
205. Nature's Touch secured a Letter of Intent on December 28, 2021 with a Building Owner/Landlord, Pal Park Boys LLC, for a lease at 1014 Washington Street in the City of Hoboken.
206. The Building Owner/Landlord, Pal Park Boys LLC, was at all times aware the intended use of the premises associated with medical retail of cannabis in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq.
207. There was a parking plan for the 1014 Washington Street location leaving City of Hoboken board approval as the only open issue.

208. The parking plan referenced in paragraph eleven above was provided to the City of Hoboken as part of the application process and is available for production in discovery.
209. At the time Nature's Touch LLC sought to secure the location, there were a total of ZERO medical dispensaries in the City of Hoboken.
210. Nature's Touch application and submissions were made by their legal counsel, Eric D. Reiser, Esq., of Shapiro Crowland, LLP, who is fully familiar with the process and procedures for submitting medical and recreational marijuana dispensary applications.
211. At all relevant times mentioned herein, Mr. Reiser prepared the application materials and submitted the same on behalf of the owners of Nature's Touch.
212. Nature's Touch LLC through it's attorney submitted a two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
213. Mr. Reiser secured a draft of the lease for the 1014 Washington Street location from the landlord prior to the City of Hoboken approval hearing.
214. The lease terms included a ten year term with a five year option.
215. The annual lease amount was \$102,000.00 with three percent annual increases with a four month security deposit and two year guarantee.
216. The lease commencement date was January 2022.
217. Pal Park Boys, LLC care of The Alexander Group NJ, LLC will confirm all lease terms at the time if trial.
218. Corrado Belgiovine, the property manager and broker for the Alexander Group NJ will confirm all the lease terms and conditions at the time of trial.
219. The City of Hoboken Cannabis Review Board unanimously approved the application by Nature's Touch.

220. On or about January 10, 2022, City of Hoboken Mayor Ravinder Singh Bhalla (hereinafter also “Mayor Bhalla”) refused to sign the letter of approval for Nature’s Touch marijuana dispensary license as part of a conspiracy with Steven M. Fulop and Jaclyn Thompson for their mutual financial benefits and the financial detriment of the plaintiffs.
221. The plaintiffs were approved for the cannabis license; had a lease in place; and the defendants, Ravinder Singh Bhalla, Steven M. Fulop and Jaclyn Thompson, knew about the approval at the time and worked to redirect the license from the plaintiffs to the defendants, Steven M. Fuller and/or Jaclyn Thompson for their mutual benefit and financial detriment of the plaintiffs.
222. The interference by the defendants, Ravinder Singh Bhalla, Steven M. Fulop and Jaclyn Thompson, was coordinated with knowledge and intent to benefit themselves to the financial detriment of the plaintiffs.
223. The concerted actions by the defendants, Ravinder Singh Bhalla, Steven M. Fulop and Jaclyn Thompson was improper.
224. Defendants, Ravinder Singh Bhalla, Steven M. Fulop and Jaclyn Thompson knew that the actions by Mayor Bhalla to quash the plaintiffs license in favor of the license granted to Jaclyn Thompson, would provide mutual financial gain to the defendants named in this paragraph while providing huge financial loss to the plaintiffs.
225. As a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fulop and Jaclyn Thompson, to wit, using Mayor Bhalla’s position, for the purposes of enriching themselves, they deprived the plaintiffs of the award of the medical retail of cannabis license in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq.

approved by the City of Hoboken at a public hearing.

226. As a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of being the ONLY such medical retail of cannabis license holder in the City of Hoboken at the time the license was approved.
227. As a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of operating their business at 1014 Washington Street for a lease term of no less than ten years with a five year option, by installing their business in its place.
228. As a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, by installing their business and making said profits in place of the plaintiffs.
229. As a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, which include to a far lesser extent the two thousand five hundred dollar application fee along with a five

thousand dollar escrow fee check as required.

230. As a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified based upon the immediate start of business in accordance with the lease commencement date of January 2022, by installing their business in its place.

WHEREFORE, Plaintiffs hereby demand judgment against the defendants, Ravinder Siingh Bhalla, Steven M. Fulop and Jaclyn Thompson, jointly and severally, for the following relief:

- A. Compensatory damages;
- B. Punitive damages;
- C. Interest;
- D. Costs of Litigation;
- E. Attorneys Fees and Costs; and
- F. Such further relief as the Court deems equitable and just.

COUNT FIVE

231. The Plaintiffs reassert and re-allege all paragraphs stated above as if set forth at length herein.
232. John and Jane Does One through Five are fictitious names persons who are/may be identified at a later time with discovery.
233. John and Jane Does One through Five knew or should have known plaintiffs Nature's Touch Med NJ LLC (hereinafter "Nature's Touch), received a medical dispensary license award in

connection with the 2019 Medical RFA.

234. John and Jane Does One through Five knew or should have known Nature's Touch LLC sought to establish a medical marijuana dispensary in the City of Hoboken.
235. John and Jane Does One through Five knew or should have known Nature's Touch followed all the necessary process and procedures in their filing of the medical marijuana dispensary application with the City of Hoboken.
236. John and Jane Does One through Five knew or should have known the City of Hoboken accepted the Nature's Touch application and processed the same in the ordinary course of its business.
237. John and Jane Does One through Five knew or should have known Nature's Touch secured a Letter of Intent on December 28, 2021 with a Building Owner/Landlord, Pal Park Boys LLC, for a lease at 1014 Washington Street in the City of Hoboken.
238. John and Jane Does One through Five knew or should have known the Building Owner/Landlord, Pal Park Boys LLC, was at all times aware the intended use of the premises associated with medical retail of cannabis in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq.
239. John and Jane Does One through Five knew or should have known there was a parking plan for the 1014 Washington Street location leaving City of Hoboken board approval as the only open issue.
240. John and Jane Does One through Five knew or should have known at the time Nature's Touch sought to secure the location, there were a total of ZERO medical dispensaries in the City of Hoboken.

241. John and Jane Does One through Five knew or should have known Nature's Touch application and submissions were made by their legal counsel, Eric D. Reiser, Esq., of Shapiro Crowland, LLP, who is fully familiar with the process and procedures for submitting medical and recreational marijuana dispensary applications.
242. John and Jane Does One through Five knew or should have known, Mr. Reiser prepared the application materials and submitted the same on behalf of the owners of Nature's Touch.
243. John and Jane Does One through Five knew or should have known Nature's Touch through it's attorney submitted a two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
244. John and Jane Does One through Five knew or should have known Mr. Reiser secured a draft of the lease for the 1014 Washington Street location from the landlord prior to the City of Hoboken approval hearing.
245. John and Jane Does One through Five knew or should have known the lease terms included a ten year term with a five year option.
246. John and Jane Does One through Five knew or should have known the annual lease amount was \$102,000.00 with three percent annual increases with a four month security deposit and two year guarantee.
247. John and Jane Does One through Five knew or should have known the lease commencement date was January 2022.
248. John and Jane Does One through Five knew or should have known Patricia Carcone, Hoboken Zoning Department Planning Board Secretary, was aware of the application submitted by Nature's Touch.
249. John and Jane Does One through Five knew or should have known Pantaleo Pellegrini is a

resident of the City of Hoboken, Hudson County, New Jersey and was the Director of the Department of Health and Human Services of the City of Hoboken until May 3, 2023, and the Director of the Department of Environmental Services until June 2018.

250. John and Jane Does One through Five knew or should have known Ravinder Singh Bhalla is/was the duly elected Mayor of the City of Hoboken, New Jersey.
251. John and Jane Does One through Five knew or should have known Ravinder Singh Bhalla, is a licensed New Jersey attorney admitted to the bar for the purposes of practicing law.
252. John and Jane Does One through Five knew or should have known Ravinder Singh Bhalla, lists his legal place of employment at Florio, Perrucci, Steinhardt & Fader, LLC.
253. John and Jane Does One through Five knew or should have known the City of Hoboken Cannabis Review Board scheduled a hearing for the license application on January 7, 2021 at four o'clock in the afternoon via zoom, which consisted of Councilmen Michael Russo, Jason Freeman and Director of Health and Human Services, Pantaleo Pellegrini.
254. John and Jane Does One through Five knew or should have known the City of Hoboken Cannabis Review Board unanimously approved the application by Nature's Touch.
255. John and Jane Does One through Five knew or should have known that on January 8, 2022, the award to Nature's Touch was reported in the local news, to wit, the Hudson County Review.
256. John and Jane Does One through Five knew or should have known that on or about January 10, 2022, City of Hoboken Mayor Ravinder Singh Bhalla (hereinafter also "Mayor Bhalla") refused to sign the letter of approval for Nature's Touch marijuana dispensary license.
257. John and Jane Does One through Five knew or should have known that on or about January 14, 2022, during a lunch meeting with Mayor Bhalla, Vijay Chaudhuri (Mayor Bhalla's Chief

of Staff), Councilman Jason Freeman, John Allen, Esq. (Corporate Counsel), Pantaleo Pellegrini, Mayor Bhalla said that he received a phone call from Mayor Fulop of Jersey City and that Mayor Fulop was extremely upset and very angry that the Cannabis Board awarded to Nature's Touch the license at said Washington Street location.

258. John and Jane Does One through Five knew or should have known at the meeting referred to in paragraph two hundred fifty seven above, Mayor Bhalla said he was quashing the award to Nature's Touch because Mayor Fulop's wife was going to get the medicinal cannabis retail location on 14th Street in Hoboken.
259. John and Jane Does One through Five knew or should have known Mayor Bhalla reiterated at the January 14, 2022 lunch meeting referenced in paragraphs two hundred fifty seven and two hundred fifty eight above herein, that he was going to quash the award to Nature's Touch and explained that in exchange, Mayor Fulop promised Mayor Bhalla that he would give Mayor Bhalla's law firm contract work.
260. John and Jane Does One through Five knew or should have known the incident in the matter before this court only became known as the result of the filing of a complaint dated and filed May 7, 2024.
261. John and Jane Does One through Five knew or should have known the information which provides the facts and knowledge which occurred during the months of January and February 2022 could have never been known by the plaintiffs but for the filing of the complaint on May 7, 2022.
262. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiffs

were deprived of the award of the medical retail of cannabis license in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq. approved by the City of Hoboken at a public hearing.

262. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiff were deprived of being the ONLY such medical retail of cannabis license holder in the City of Hoboken at the time the license was approved.
263. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiff were deprived of operating their business at 1014 Washington Street for a lease term of no less than ten years with a five year option.
264. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiff were deprived of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified.
265. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiff were deprived of all income from the operation of said business resulting in damages of lost

profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, which include to a far lesser extent the two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.

266. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, the plaintiff were deprived of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified based upon the immediate start of business in accordance with the lease commencement date of January 2022.
267. John and Jane Does One through Five knew or should have known the actions of Mayor Bhalla were in direct contrast and violation of protections afforded a public employee from liability for injury where such actions are "resulting from the exercise of judgment or discretion vested in him." (N.J.S.A. 59:3-2(a) see also *Burke v. Deiner*, 97 N.J. 465, 472-473 (1984); *Visidor Corporation v. Borough of Cliffside Park*, 48 N.J. 214, 221 (1966).
268. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of Mayor Bhalla, acting in the capacity of Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, were in complete disregard of the plaintiffs as stated in N.J.S.A. 59:3-14, subsection (a): "[N]othing in this act shall exonerate a public employee from liability if it is established that his conduct was outside the scope of his employment, or constituted a crime, actual fraud, actual malice or willful misconduct." See also, *Burke v. Deiner*, supra, at 472-473.
269. As a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the

Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of being the ONLY such medical retail of cannabis license holder in the City of Hoboken at the time the license was approved.

270. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of operating their business at 1014 Washington Street for a lease term of no less than ten years with a five year option.
271. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified.
272. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, which include to a far lesser extent the two thousand five hundred dollar application fee along with a five

thousand dollar escrow fee check as required.

273. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of defendant Bhalla, using his capacity of the Mayor of the City of Hoboken, with apparent authority to bind the City of Hoboken to his decisions, defendant Bhalla sought to directly enrich himself and thereby deprive the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified based upon the immediate start of business in accordance with the lease commencement date of January 2022.
274. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of defendants Steven M. Fullop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of the award of the medical retail of cannabis license in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq. approved by the City of Hoboken at a public hearing.
275. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of defendants Steven M. Fullop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of being the ONLY such medical retail of cannabis license holder in the City of Hoboken at the time the license was approved.
276. John and Jane Does One through Five knew or should have known as a direct and proximate

cause of the actions of defendants Steven M. Fullop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of operating their business at 1014 Washington Street for a lease term of no less than ten years with a five year option, by installing their business in its place.

277. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of defendants Steven M. Fullop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, by installing their business and making said profits in place of the plaintiffs.
278. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of defendants Steven M. Fullop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro quo inducements for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, which include to a far lesser extent the two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
279. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the actions of defendants Steven M. Fullop and Jaclyn Thompson, to wit, using their influence over the Mayor of the City of Hoboken with quid pro quo inducements for the

purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified based upon the immediate start of business in accordance with the lease commencement date of January 2022, by installing their business in its place.

280. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of the award of the medical retail of cannabis license in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq. approved by the City of Hoboken at a public hearing.
281. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of being the ONLY such medical retail of cannabis license holder in the City of Hoboken at the time the license was approved.
282. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of operating their business at 1014 Washington Street for a lease term of no less than ten years with a five year option, by installing their business in its place.

283. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, by installing their business and making said profits in place of the plaintiffs.
284. John and Jane Does One through Five knew or should have known as a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified, which include to a far lesser extent the two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
285. As a direct and proximate cause of the co-conspirator actions of defendants, Ravinder Singh Bhalla, Steven M. Fullop and Jaclyn Thompson, to wit, using Mayor Bhalla's position, for the purposes of enriching themselves, they deprived the plaintiffs of all income from the operation of said business resulting in damages of lost profits, lost income, lost earnings, attorney's fees, costs and other financial damages which can be quantified based upon the immediate start of business in accordance with the lease commencement date of January 2022, by installing their business in its place.

WHEREFORE, Plaintiffs hereby demand judgment against the defendant, John and Jane

Does One through Five knew or should have known, acting as respondeat superior for the actions of the City of Hoboken, acting individually on their own behalf, jointly and severally, for the following relief:

- A. Compensatory damages;
- B. Punitive damages;
- C. Interest;
- D. Costs of Litigation;
- E. Attorneys Fees and Costs; and
- F. Such further relief as the Court deems equitable and just.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of Rule 4:25-4, the Court of hereby advised that Vince A. Sicari, Esq., is designated as trial counsel herein.

Vince A. Sicari, Esq., Attorney At Law
Attorney for the Plaintiffs

Dated: _____

By: _____
Vince A. Sicari

JURY DEMAND

Plaintiffs hereby demand a trial by jury on all issues so triable.

Vince A. Sicari, Esq., Attorney At Law
Attorney for the Plaintiffs

Dated: _____

By: _____
Vince A. Sicari

CERTIFICATION

This is o certify that the within matter is not the subject of any other proceeding in any Court or arbitration proceeding, and that no other such action or proceeding is contemplated. I am presently aware of no persons or entities who should be joined in the complaint.

Vince A. Sicari, Esq., Attorney At Law
Attorney for the Plaintiffs

Dated: _____

By: _____
Vince A. Sicari

VINCE A. SICARI, ESQ. Id#020151996
ATTORNEY AT LAW, LLC
Post Office Box 9157
Paramus, New Jersey 07653-9157
Telephone: 201.261.3345
Email: VinceSicariLaw@aol.com
Attorney for Plaintiff

**Nature's Touch Med NJ, LLC d/b/a
Nature's Touch**

Plaintiff

versus

**City of Hoboken, City of Hoboken as
Respondeat Superior for Mayor Ravinder
Singh Bhalla, Ravinder Singh Bhalla
(individually), Steven Fulop (individually),
Jaelyn Thompson (individually), John
Does 1 through 5 (fictitious named parties
to potentially be identified at a later time).**

Defendants.

**NEW JERSEY SUPERIOR COURT
HUDSON COUNTY VICINAGE
CIVIL PART**

DOCKET NUMBER:

**CERTIFICATION OF MARIA SAUSA
IN SUPPORT OF COMPLAINT**

I, Maria Sausa, residing at 10 Orchard Road, Borough of Demarest, County of Bergen, State of New Jersey 07627 and make this certification in support of a complaint against the defendants captioned above herein;

1. Nature's Touch Med NJ LLC (hereinafter "Nature's Touch"), is a limited liability company formed on or about August 5, 2019 with a principal address of 10 Orchard Road, Demarest, New Jersey 07627.
2. I, Amy Sausa, am the registered agent for Nature's Touch LLC (hereinafter referred to as "our company") and serve in the capacity of Owner/Secretary with the company.
3. I co-own Nature's Touch as a thirty three and a third percent owner along with Amy Sausa

whois also a thirty three and a third percent owner; and Jennifer Doherty a thirty three and a third percent owner (hereinafter collectively referred to as “we.”).

4. I applied for and Nature’s Touch received a medical dispensary license award in connection with the 2019 Medical RFA.
5. Soon after getting the license we (Nature’s Touch LLC) sought to establish a medical marijuana dispensary in the City of Hoboken.
6. I followed all the necessary process and procedures in their filing of the medical marijuana dispensary application with the City of Hoboken.
7. The City of Hoboken accepted the Nature’s Touch application and processed the same in the ordinary course of its business.
8. On or about December 28, 2021, our company secured a Letter of Intent with a Building Owner/Landlord, Pal Park Boys LLC, for a lease at 1014 Washington Street in the City of Hoboken.
9. The Letter of Intent referenced in paragraph eight above was provided to the City of Hoboken as part of the application process and is available for production in discovery.
10. The Building Owner/Landlord, Pal Park Boys LLC, was at all times aware the intended use of the premises associated with medical retail of cannabis in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq.
11. There was a parking plan for the 1014 Washington Street location leaving City of Hoboken board approval as the only open issue.
12. The parking plan referenced in paragraph eleven above was provided to the City of Hoboken as part of the application process and is available for production in discovery.

13. At the time Nature's Touch LLC sought to secure the location, there were a total of ZERO medical dispensaries in the City of Hoboken, hence, this became a very important and extremely profitable business venture.
14. Nature's Touch application and submissions were made by our legal counsel, Eric D. Reiser, Esq., of Shapiro Crowland, LLP, who is fully familiar with the process and procedures for submitting medical and recreational marijuana dispensary applications.
15. We provided Mr. Reiser with all the necessary paperwork for our company and he prepared the application materials and submitted the same on our behalf.
16. We then submitted through Mr. Reiser a two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
17. The checks referenced in paragraph sixteen above were provided to the City of Hoboken as part of the application process, are part of a public and business record and can be made available for production in discovery.
18. Mr. Reiser secured a draft of the lease for the 1014 Washington Street location from the landlord prior to the City of Hoboken approval hearing.
19. The lease referenced in paragraph eighteen above was provided to the City of Hoboken as part of the application process and is available for production in discovery.
20. The lease terms included a ten year term with a five year option as we were extremely confident in the potential financial success of the company especially that there was no immediate competitive business in the entire City of Hoboken.
21. The annual lease amount was \$102,000.00 with three percent annual increases with a four month security deposit and two year guarantee and the lease commencement date was January 2022.

22. All of the information regarding the lease can be corroborated by Pal Park Boys, LLC care of The Alexander Group NJ, LLC.
24. Corrado Belgiovine, was the property manager and broker for the Alexander Group NJ who can also corroborate the details explained regarding the lease.
25. Mr. Reiser and our company dealt with Patricia Carcone, Hoboken Zoning Department Planning Board Secretary, regarding the application for the license.
26. Upon information ascertained through a complaint filed in Hudson County Superior Court, Pantaleo Pellegrini is a resident of the City of Hoboken, Hudson County, New Jersey and was the Director of the Department of Health and Human Services of the City of Hoboken until May 3, 2023, and the Director of the Department of Environmental Services until June 2018.
27. Ravinder Singh Bhalla is/was the duly elected Mayor of the City of Hoboken, New Jersey.
28. I also understand that Ravinder Singh Bhalla is/was licensed to practice law in the State of New Jersey and operates a solo law practice.
29. I personally attended the City of Hoboken Cannabis Review Board scheduled a hearing for the license application on January 7, 2021 at four o'clock in the afternoon via zoom, which consisted of Councilmen Michael Russo, Jason Freeman and Director of Health and Human Services, Pantaleo Pellegrini.
30. The City of Hoboken Cannabis Review Board unanimously approved the application by Nature's Touch at that time.
31. My partners and I were thrilled to get approval as this was a huge financial opportunity for us.
32. I remember the approval was reported to local news on January 8, 2022, to wit, the Hudson

County Review.

33. I was then notified on or about January 10, 2022, City of Hoboken Mayor Ravinder Singh Bhalla (hereinafter also “Mayor Bhalla”) refused to sign the letter of approval for Nature’s Touch marijuana dispensary license.
34. I was perplexed and absolutely livid to hear of the Mayor’s actions and even more irrate when being told no one knew why the Mayor refused to sign and that there was nothing we could do as his refusal was within his powers.
35. Approximately six weeks ago I saw a news report regarding a lawsuit against the City of Hoboken which named the Mayor. Upon further reading, the report specifically referenced our license application.
36. The complaint filed against the Mayor states; “On or about January 14, 2022, during a lunch meeting with Mayor Bhalla, Vijay Chaudhuri (Mayor Bhalla’s Chief of Staff), Councilman Jason Freeman, John Allen, Esq. (Corporate Counsel), Pantaleo Pellegrini, Mayor Bhalla said that he received a phone call from Mayor Fulop of Jersey City and that Mayor Fulop was extremely upset and very angry that the Cannabis Board awarded to Nature’s Touch the license at said Washington Street location.”
37. The statement made in paragraph thirty six above is part of a certification made by Pantaleo Pellegrini who filed suit against the City of Hoboken. This is the first time I ever heard this information and obviously there was no possible way for me to have known about it.
38. The complaint further stated that Mayor Bhalla said he was quashing the award to Nature’s Touch because Mayor Fulop’s wife was going to get the medicinal cannabis retail location on 14th Street in Hoboken.
39. The information was withheld from my attorney; my partners, and absolutely hidden and

concealed, even worse, we were given no reason why the Mayor refused to provide the license until the filing of the Pellegrini complaint and news article.

40. Adding insult to injury, the Pellegrini complaint states; “Mayor Bhalla reiterated at the January 14, 2022 lunch meeting he was going to quash the award to Nature’s Touch and explained that in exchange, Mayor Fulop promised Mayor Bhalla that he would give Mayor Bhalla’s law firm contract work.”
41. This quid pro quo was a direct and intentional act by the Mayor of Hoboken against our company.
42. I now know, Steven M. Fulop, the Mayor of Jersey City, New Jersey who is married to Jaclyn Thompson.
43. Apparently Jaclyn Thompson, is a co-owner of Story Dispensary of Hoboken, LLC, which submitted an application to operate a cannabis retail operation in Hoboken, New Jersey.
44. I now know, on or about February 24, 2022, there was a meeting of the Cannabis Review Board to vote on Jaclyn Thompson’s application for the cannabis medicinal retail location on 14th Street in the City of Hoboken (This information is part of a business record in the City of Hoboken and subject to FOIA (Freedom of Information Act)).
45. According to Pellegrini, the day prior to the meeting, Mayor Bhalla told Panteleo Pellegrini that he (the Mayor) needed the Cannabis Board to approve Mayor Fulop’s wife’s application, right after denying our application making it clear his intentionally harmed me and my company in favor of Mayor Fulop and his wife Jaclyn Thompson.
46. Upon further information and investigation I now know, in June of 2022, Mayor Bhalla made sure to fast track an expansion of a Cannabis license granted to Joseph Castiello to include recreational use.

47. I am also now aware that Mayor Bhalla forwarded three other applications to the Cannabis Review Board for approval which were not approved thanks to Pantaleo Pellegrini.
48. At all relevant times mentioned herein, Ronald P. Mondello, Esq., is/was the Cannabis Control Board for the City of Hoboken, who advised the Plaintiffs he would offer assistance to Nature's Touch to find out why Mayor Bhalla quashed the license.
49. Ronald P. Mondello, Esq., was always professional, courteous and helpful, and I am certain he had no idea of all the goings on mentioned in this certification and my complaint.
50. Mr. Mondello was asked directly and through my counsel to get the answer due to the covert nature of Mayor Bhalla's actions at the time we were denied.
51. Mr. Mondello's lack of knowledge and position makes it clear, if he did not know about all of Mayor Bhalla's backdoor dealings, there was no way I (we) could have known either.
52. I have since retained Vince A. Sicari, Esq., to represent our company in a Title 59 action against all the defendants in the caption and we all agree the actions by Mayor Bhalla, Steven M. Fulop and Jaclyn Thompson were part of an undisclosed conspiracy which deprived Nature's Touch of a business operation.
53. My attorney immediately notified the City of Hoboken and Ravinder Bhalla of our Title 59 Notice of Intent to Make Claim by certified mail return receipt dated May 14, 2024.
54. I have seen the return receipt proof of mailing were signed for by the City of Hoboken Clerk for both the City of Hoboken and Mayor Bhalla on May 17, 2024.
55. Over thirty days has since passed and the my attorney has received nothing from the City of Hoboken and I fear the records will be sealed, destroyed or protected with changes to New Jersey laws regarding records availability.
56. I have asked and authorized my attorney to act swiftly in this matter and file whatever

necessary to protect my and my company's rights and remedies.

I certify that all statements contained herein are true and accurate under the laws of New Jersey and that any false statement may be punishable under law.

Maria Sausa

VINCE A. SICARI, ESQ. Id#020151996
ATTORNEY AT LAW, LLC
Post Office Box 9157
Paramus, New Jersey 07653-9157
Telephone: 201.261.3345
Email: VinceSicariLaw@aol.com
Attorney for Plaintiff

**Nature's Touch Med NJ, LLC d/b/a
Nature's Touch**

Plaintiff

versus

**City of Hoboken, City of Hoboken as
Respondeat Superior for Mayor Ravinder
Singh Bhalla, Ravinder Singh Bhalla
(individually), Steven Fulop (individually),
Jaelyn Thompson (individually), John
Does 1 through 5 (fictitious named parties
to potentially be identified at a later time).**

Defendants.

**NEW JERSEY SUPERIOR COURT
HUDSON COUNTY VICINAGE
CIVIL PART**

DOCKET NUMBER:

**CERTIFICATION OF AMY SAUSA
IN SUPPORT OF COMPLAINT**

I, Amy Sausa, residing at 65 Eckerson Road, Borough of Harrington Park, County of Bergen, State of New Jersey 07640 and make this certification in support of a complaint against the defendants captioned above herein;

1. Nature's Touch Med NJ LLC (hereinafter "Nature's Touch"), is a limited liability company formed on or about August 5, 2019 with a principal address of 10 Orchard Road, Demarest, New Jersey 07627.
2. I, Amy Sausa, am a thirty three and a third percent owner along with Maria Sausa who is also a thirty three and a third percent owner; and Jennifer Doherty a thirty three and a third percent owner (hereinafter collectively referred to as "we.").

3. Nature's Touch (hereinafter "the company") applied for and received a medical dispensary license award in connection with the 2019 Medical RFA.
4. Soon after getting the license the company sought to establish a medical marijuana dispensary in the City of Hoboken.
5. The company followed all the necessary process and procedures in filing for the medical marijuana dispensary application with the City of Hoboken.
6. The City of Hoboken accepted the company's application and processed the same in the ordinary course of its business.
7. On or about December 28, 2021, the company secured a Letter of Intent with a Building Owner/Landlord, Pal Park Boys LLC, for a lease at 1014 Washington Street in the City of Hoboken.
8. The Letter of Intent referenced in paragraph eight above was provided to the City of Hoboken as part of the application process.
9. The Building Owner/Landlord, Pal Park Boys LLC, was at all times aware the intended use of the premises associated with medical retail of cannabis in accordance with the New Jersey Cannabis Regulatory Enforcement Assistance, and Marketplace Modernization Act, N.J.A.C. § 24:61-31 et seq.
10. There was a parking plan for the 1014 Washington Street location leaving City of Hoboken board approval as the only known open issue regarding our application.
11. The parking plan referenced in paragraph ten above was provided to the City of Hoboken as part of the application process.
12. At the time the company secured the location, there were a total of ZERO medical dispensaries in the City of Hoboken, hence, this became a very important and extremely

profitable business venture as the “only game in town.”

13. The company submitted all documents through our legal counsel, Eric D. Reiser, Esq., of Shapiro Crowland, LLP, who is fully familiar with the process and procedures for submitting medical and recreational marijuana dispensary applications.
14. The company provided Mr. Reiser with all the necessary paperwork for our company and he prepared the application materials and submitted the same on our behalf.
15. The company then submitted through Mr. Reiser a two thousand five hundred dollar application fee along with a five thousand dollar escrow fee check as required.
16. Mr. Reiser secured a draft of the lease for the 1014 Washington Street location from the landlord prior to the City of Hoboken approval hearing and the same was provided to the City of Hoboken as part of the application process.
17. The lease terms included a ten year term with a five year option as we were extremely confident in the potential financial success of the company and wanted a long term lease, especially that there was no immediate competitive business in the entire City of Hoboken.
18. The annual lease amount was \$102,000.00 with three percent annual increases with a four month security deposit and two year guarantee and the lease commencement date was January 2022 which supports the level of our financial commitment.
19. It is my understanding that Mr. Reiser and our company dealt with Patricia Carcone, Hoboken Zoning Department Planning Board Secretary, regarding the application for the license.
20. I recently became aware of facts affecting the refusal to issue the company the license through a complaint filed in Hudson County Superior Court, Pantaleo Pellegrini, a resident of the City of Hoboken, Hudson County, New Jersey and Director of the Department of

Health and Human Services of the City of Hoboken until May 3, 2023, and the Director of the Department of Environmental Services until June 2018.

21. Ravinder Singh Bhalla is/was the duly elected Mayor of the City of Hoboken, New Jersey.
22. Ravinder Singh Bhalla is/was licensed to practice law in the State of New Jersey and operates a solo law practice.
23. The City of Hoboken Cannabis Review Board scheduled a hearing for the license application on January 7, 2021 at four o'clock in the afternoon via zoom, which consisted of Councilmen Michael Russo, Jason Freeman and Director of Health and Human Services, Pantaleo Pellegrini.
24. The City of Hoboken Cannabis Review Board unanimously approved the application by Nature's Touch at that time.
25. The company partners and myself were thrilled to get approval as this was a huge financial opportunity for us.
26. Maria Sausa advised me the license approval was reported to local news on January 8, 2022, to wit, the Hudson County Review.
27. Maria Sausa then notified me that City of Hoboken Mayor Ravinder Singh Bhalla (hereinafter also "Mayor Bhalla") refused to sign the letter of approval for Nature's Touch marijuana dispensary license.
28. I was extremely upset over the Mayor's refusal and even more irate when being told no one knew why the Mayor refused to sign and that there was nothing we could do as his refusal was within his powers.
29. Approximately six weeks ago Maria Sausa provided me a news report regarding a lawsuit against the City of Hoboken which named the Mayor. Upon further reading, the report

specifically referenced our license application.

30. The complaint filed against the Mayor states; “On or about January 14, 2022, during a lunch meeting with Mayor Bhalla, Vijay Chaudhuri (Mayor Bhalla’s Chief of Staff), Councilman Jason Freeman, John Allen, Esq. (Corporate Counsel), Pantaleo Pellegrini, Mayor Bhalla said that he received a phone call from Mayor Fulop of Jersey City and that Mayor Fulop was extremely upset and very angry that the Cannabis Board awarded to Nature’s Touch the license at said Washington Street location.”
31. The statement made in paragraph thirty above is part of a certification made by Pantaleo Pellegrini who filed suit against the City of Hoboken. This is the first time I ever heard this information and obviously there was no possible way for me to have known about it.
32. The complaint further stated that Mayor Bhalla said he was quashing the award to Nature’s Touch because Mayor Fulop’s wife was going to get the medicinal cannabis retail location on 14th Street in Hoboken.
33. The information regarding the Mayor’s actions was withheld from my attorney; my partners, and absolutely hidden and concealed. We were given no reason why the Mayor refused to provide the license until the filing of the Pellegrini complaint and news article.
34. The Pellegrini complaint shockingly states; “Mayor Bhalla reiterated at the January 14, 2022 lunch meeting he was going to quash the award to Nature’s Touch and explained that in exchange, Mayor Fulop promised Mayor Bhalla that he would give Mayor Bhalla’s law firm contract work.”
35. It seems difficult to refute the Mayor’s actions were part of a quid pro quo and a direct and intentional act by the Mayor of Hoboken against our company.
36. I now know, Steven M. Fulop, the Mayor of Jersey City, New Jersey who is married to

Jaclyn Thompson.

37. I now know Jaclyn Thompson, is a co-owner of Story Dispensary of Hoboken, LLC, which submitted an application to operate a cannabis retail operation in Hoboken, New Jersey.
38. I now know, on or about February 24, 2022, there was a meeting of the Cannabis Review Board to vote on Jaclyn Thompson's application for the cannabis medicinal retail location on 14th Street in the City of Hoboken (This information is part of a business record in the City of Hoboken and subject to FOIA (Freedom of Information Act)).
39. According to Pellegrini, the day prior to the meeting, Mayor Bhalla told Panteleo Pellegrini that he (the Mayor) needed the Cannabis Board to approve Mayor Fulop's wife's application, right after denying our application making it clear he intentionally harmed our company in favor of Mayor Fulop and his wife Jaclyn Thompson.
40. Upon further information and investigation, I now know, in June of 2022, Mayor Bhalla made sure to fast track an expansion of a Cannabis license granted to Joseph Castiello to include recreational use.
41. I am also now aware that Mayor Bhalla forwarded three other applications to the Cannabis Review Board for approval which were not approved thanks to Pantaleo Pellegrini.
42. Maria Sausa and I were searching for answers and requested Ronald P. Mondello, Esq., assist us in providing any information he may have had.
43. Mr. Mondello was asked directly and through my counsel to get the answer, however, due to the covert nature of Mayor Bhalla's actions at the time, we were denied.
44. Mr. Mondello's lack of knowledge and position makes it clear, if he did not know about all of Mayor Bhalla's backdoor dealings, there was no way the company could have known either.

45. The company has since retained Vince A. Sicari, Esq., to represent our financial damages interest in a Title 59 action against all the defendants in the caption and we all agree the actions by Mayor Bhalla, Steven M. Fulop and Jaclyn Thompson were part of an undisclosed conspiracy which deprived Nature's Touch of a business operation.
46. Mr. Sicari immediately notified the City of Hoboken and Ravinder Bhalla of our Title 59 Notice of Intent to Make Claim by certified mail return receipt dated May 14, 2024.
47. I am aware there is a return receipt proof of mailing were signed for by the City of Hoboken Clerk for both the City of Hoboken and Mayor Bhalla on May 17, 2024.
48. Over thirty days has since passed and my attorney has received nothing from the City of Hoboken and I fear the records will be sealed, destroyed or protected with changes to New Jersey laws regarding records availability.
49. The company authorizes my attorney to act swiftly in this matter and file whatever necessary to protect my and my company's rights and remedies.

I certify that all statements contained herein are true and accurate under the laws of New Jersey and that any false statement may be punishable under law.

Amy Sausa

VINCE A. SICARI, ESQ. Id#020151996
ATTORNEY AT LAW, LLC
Post Office Box 9157
Paramus, New Jersey 07653-9157
Telephone: 201.261.3345
Email: VinceSicariLaw@aol.com
Attorney for Plaintiff

**Nature’s Touch Med NJ, LLC d/b/a
Nature’s Touch**

Plaintiff

versus

**City of Hoboken, City of Hoboken as
Respondeat Superior for Mayor Ravinder
Singh Bhalla, Ravinder Singh Bhalla
(individually), Steven Fulop (individually),
Jaelyn Thompson (individually), John
Does 1 through 5 (fictitious named parties
to potentially be identified at a later time).**

Defendants.

**NEW JERSEY SUPERIOR COURT
HUDSON COUNTY VICINAGE
CIVIL PART**

DOCKET NUMBER:

ORDER TO SHOW CAUSE

PRELIMINARY INJUNCTION

PURSUANT TO RULE 4:52

THIS MATTER having been brought before the court by Vince A. Sicari, Esq., attorney for the Plaintiff, Nature’s Touch Med NJ, LLC d/b/a Nature’s Touch, seeking relief by way of preliminary injunction as the return date set forth below pursuant to *R. 4:52*, based upon the facts set forth in the verified complaint filed herewith and for good cause show.

IT IS ON THIS ____ day of July, 2024

ORDERED that the defendants, City of Hoboken, Ravinder Singh Balla, Steven Fulop, and Jaelyn Thompson, appear and show cause before the Superior Court at the Hudson County Court house in Jersey City, New Jersey at ____ o’clock in the noon or as soon thereafter as counsel can be heard, on the ____ day of July, 2024, why an Order should not be issued preliminary enjoining and

restraining the defendants, City of Hoboken, Ravinder Singh Bhalla, Steven Fulop and Jaclyn Thompson from:

- A. Sealing any documents belonging to the City of Hoboken;
- B. Destroying or deleting emails and correspondence between each other dating back to January 1, 2022;
- C. Selling, transferring or disposing of any personal assets due to the potential damages claim by the Plaintiff;
- D. Dissipating of assets including the sale of Defendant, Jaclyn Thompson's marijuana sale business in Hoboken;

Additionally, Ordering;

- E. Plaintiff to access all discoverable documents in the pending action identified as Pantaleo Pellegrini vs. City of Hoboken; Mayor Ravinder Singh Bhalla; ABC CORPORATION 1-10; ABC, LLC 1-10; XYZ PARTNERSHIP 1-10; JOHN DOES 1-10; and JANE DOES 1-10 (name being fictitious as true identities are unknown) under Docket Number HUD-L-1720-24
- F. Merging this action with Pantaleo Pellegrini vs. City of Hoboken; Mayor Ravinder Singh Bhalla; ABC CORPORATION 1-10; ABC, LLC 1-10; XYZ PARTNERSHIP 1-10; JOHN DOES 1-10; and JANE DOES 1-10 (name being fictitious as true identities are unknown) under Docket Number HUD-L-1720-24 if the court determines there are enough or substantial overlapping issues consistent with Entire Controversy holdings in *Manhattan Woods Golf Club, Inc. v. Arai*, 711 A.2d 1367 (N.J. App.), cert. denied, 156 N.J. 411 (1998) and this Order be served upon Plaintiff's counsel Giovanni De Pierro, Esq. For Pantaleo Pellegrini and Defense counsel to all defendants in said matter;

- G. Compelling the defendants in this captioned matter pay appropriate damages to the Plaintiff;
- H. Compelling the defendants to pay costs of suit to the Plaintiff;
- I. Compelling the defendants pay Plaintiff's counsel fees;
- J. Granting such other relief as the court may deem equitable and just.

And it is further ORDERED that:

1. A copy of this Order to Show Cause, Verified Complaint, Legal Memorandum and any supporting affidavits or certifications submitted in support of this application be served upon the defendant(s) personally or through their designated counsel via email, direct or postal service with ____ days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.
2. The Plaintiff must file with the court its proof of service of the pleadings on the defendant 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 the request of injunctive relief and proof of service by August ____, 2024. The original documents must be filed with the clerk of the Superior Court in the county listed above. A list of these offices is provided. You must send a copy of your opposition papers directly to Judge _____, whose address is Hudson County Superior Court, 595 Newark Avenue, Room ____, Jersey City, New Jersey 07306. You must also send a copy of your opposition papers to the Plaintiff's attorney, Vince A. Sicari, Esq., to 724 Elm Avenue, River Edge, New Jersey 07661. 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 Plaintiff must file and serve an written reply to the Defendant's order to show cause opposition by August ____, 2024. 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 Defendant does 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 Plaintiff files a proof of service and a proposed form of Order ar least three days prior to the return date.
6. If the Plaintiff has not done so, a proposed form of Order addressing the relief sought on the return date (along with a self addressed return envelope with the 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 Plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The Verified Complaint attached to this Order to Show Cause states the basis of the lawsuit. If you dispute this complaint, you or your attorney, must file a written answer to the complaint and proof of service with 35 days from the day of service of ths Order to Show Cause; not counting the day you received it.

The documents must be filed with the Clerk of the Superior Court in the county listed above.

A list of these offices is provided. 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 is listed above herein. 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 dayes 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 offices in the county in which you live. A list of these offices is provided. 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 list of the numbers is also provided.

The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause, unless the Court and the parties are advised to the contrary no later than _____ days, before the return date.

J.S.C.

CERTIFICATION OF SERVICE

Vince A. Sicari, an attorney at law of the State of New Jersey, certifies the following to be true:

1. On July ____, 2024, copies of this notice and the aforementioned certifications, letter brief, proposed order and proposed amended pleading, are being served via email, hand delivery (and/or) priority mail on all Defendants:

City of Hoboken
94 Washington Street
Hoboken, New Jersey 07030

Ravinder Singh Bhalla
Address
City, State Zip

Steven Fulop
Address
City State Zip

Jaelyn Thompson
Address
City State Zip

2. On the same date, copies of the papers are being sent via hand delivery to the Judge assigned to this matter:

Hudson County Justice Center
595 Newark Avenue
Room _____
Jersey City, New Jersey 07306

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

Date: July ____, 2024

Vince A. Sicari
Attorney at Law, State of NJ