

EDWARD J. KOLOGI, ESQ.

MICHAEL S. SIMITZ, ESQ.

ALSO ADMITTED IN NY

500 NORTH WOOD AVENUE

SUITE 4B

LINDEN, NJ 07036

PHONE (908)486-8877

FAX (908)486-3911

503 UNION AVENUE (ROUTE 71)

(KENNEDY LAW FIRM BUILDING)

BRIELLE, NJ 08730

PHONE (732)221-0606

FAX (732)612-3437

February 20, 2018

Joanne Rajoppi

County Clerk

Union County Courthouse

2 Broad Street

Elizabeth, NJ 07207

PLEASE REPLY TO LINDEN OFFICE.

E\_KOLOGI\_ESQ@COMCAST.NET

MICHAELSIMITZ@AOL.COM

WWW.KOLOGI-SIMITZ.COM

**VIA HAND DELIVERY**

Dear Ms. Rajoppi:

This firm represents Senator Nicholas Scutari with regard to his candidacy for the Chairmanship of the Union County Democratic Committee, which election will take place on Wednesday, February 21, 2018 at 7:00 p.m. We are writing to bring to your attention a most serious matter which may have significant legal consequences relative to the currently certified membership of the Union County Democratic Committee.

Succinctly stated, we have been provided with what appears to be credible evidence that at least five "vacancies" in the UCDC from the Township of Union never in fact existed, although they were allegedly verified as such by the Municipal Chair and subsequently replaced by new members. Enclosed are Affidavits from the individuals involved verifying that they never in fact resigned, along with documentation alleging the existence of the vacancies and their replacements:

D-42	Ricardo & Versie McNeil	1325 Marcella Drive, Union, NJ
D-6	Rafael & Lucia Prisco	2261 Copper Hill Drive, Union, NJ
D-38	Tamesc Cohen	285 Indiana Street, Union, NJ

Since there were never in fact any vacancies, we believe the Committeepersons originally elected to the enumerated seats should be certified as lawfully seated and current Committee members.

The above facts, if accurate, raise a specter of conduct inconsistent with applicable law, and the integrity of the Committeeperson replacement process. As the individual charged with the certifying of Committee members, we are requesting your immediate review of the foregoing

Joanna Rajoppi, County Clerk  
February 20, 2018  
Page -2-

and whatever remedial action is necessary to insure that the Committee persons certified to vote on February 21, 2018 are lawfully entitled to do so. We are further seeking an investigation into the facts and circumstances presented to determine whether any violation of law occurred.

Thanking you for your anticipated prompt attention to the above, I am

Very truly yours,

KOLOGI ♦ SIMITZ

By: 

EDWARD J. KOLOGI

EJK:sc

c: Colleen Mahr, UCDC Acting Chair (Via email [colleenmahr@hotmail.com](mailto:colleenmahr@hotmail.com))  
Robert Renaud, UCDC Counsel (Via Fax 908-272-9029)  
Nicholas Scutari (Via email [nicholasscutari@yahoo.com](mailto:nicholasscutari@yahoo.com))

Recardo McNeil.pdf

Open in browser tab

Tony1

To Ed

Please

TONY  
908-2-  
ConVI

Begin

Frc  
Dal  
To:  
<B  
SulFro  
Ser  
To:  
SulHe  
JinJin  
Dir

## "County Committee" Address Verification

Name: LICKED  
RICARD M. MCNEIL  
Address: 1325 MARCELLA DRIVE  
City/State/Zip: UNION, NJ 07083  
Phone: \_\_\_\_\_

Date: 2/14/2018

## Details

Name: Recardo McNeil.pdf  
Size: 4400 Route 9, Suite 1000  
Modified: Free 800-835-2994  
Tel: 800-835-2994  
732-398-0400  
Edwards 732-398-3314

### AFFIDAVIT

To whom it may concern,

Please be advised that I, County Committeeman/woman Same AS AboveCurrently resides at: Same AS Above

I understand and affirm that:

- ☒ I am a current County Committee man/woman for the County of Union
- ☐ I resigned my position as a County Committee man/woman on: \_\_\_\_\_
- ☒ I have not resigned, nor do I have any knowledge of my resigning as a County Committee man/woman.

Signature

Date

RESIGNATION OF MEMBER OF MUNICIPAL AND COUNTY  
DEMOCRATIC COMMITTEE  
PURSUANT TO N.J.S.A. 19:13-20

RECEIVED  
MAY 10 2018  
MAY 10 2018  
NOTARY PUBLIC

Municipality: Union

Ward \_\_\_\_\_ District 42

Name of Resignee: Ricardo McNeil

I hereby resign as a member of the Union Municipal  
Democratic Committee and the Union County Democratic Committee, effective  
immediately.

*Resigned signature not available*

X *[Signature]*  
Signature of Resignee

*municipal chair signature*

Sworn and subscribed to before me

this 1<sup>st</sup> day of February, 2018

*Erika Carter*



ACCEPTANCE OF APPOINTMENT PURSUANT TO N.J.S.A. 19:13-20

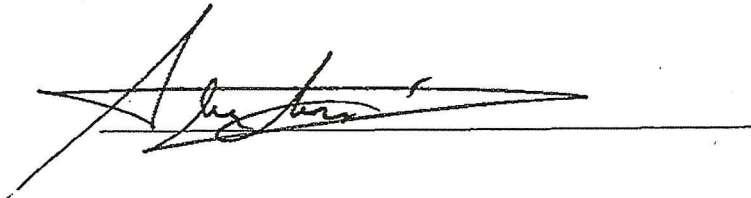
RECEIVED  
UNION COUNTY CLERK

2018 FEB -7 AM 11:57

RECEIVED  
UNION COUNTY CLERK

I, Antenor Medor, residing at 1527 Vaux Hall  
Union, New Jersey, hereby accept my selection by the Union  
Democratic Municipal Committee to the office of Male Member of the Union  
Democratic Municipal Committee and Union County Democratic  
Committee for the 42nd District.

I hereby certify that I am qualified by the laws of this State to serve as a member of the  
Union Democratic Municipal Committee and the Union County  
Democratic Committee, that I am a resident of the 42nd District, that I am a member  
of the Democratic Party, and that I am not a member of or identified with any other political  
party or any political organization espousing the causes of candidates of any other political party.



Dated: 2/1/18.

DIANA J. RUTLEDGE  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires July 13, 2020

Sworn to and subscribed  
before me this 1st day  
of February 2018

CERTIFICATE OF SELECTION PURSUANT TO N.J.S.A. 19:13-20

I, Joseph Cryan, hereby certify that:

1. I am the Chairperson of the Union Democratic Municipal Committee.

2. A vacancy has occurred in the Office of Male Member of the Union Democratic Committee and the Union County Democratic Committee for the 42nd District and that Medor Antenor, who resides at 1527 Vaux Hall Road, Union, New Jersey, was duly selected pursuant to N.J.S.A. 19:5-2 and 5-3 to fill said vacancy by the remaining members of the Union Democratic Municipal Committee.

[Signature]  
Democratic Municipal Chairperson

Dated: 2/1/18

CERTIFICATE OF SELECTION PURSUANT TO N.J.S.A. 19:13-20

RECEIVED  
UNION COUNTY CLERK  
FEB 07 AM 11:57

I, Colleen Mahr, hereby certify that:

1. I am the Chairperson of the Union County Democratic Committee.
2. I have been notified, pursuant to N.J.S.A. 19:13-20, that a vacancy occurred in the Office of Male/Female County Committee Person for the Union Democratic Municipal Committee and the Union County Democratic Committee for the 4th District and that Antoine Medore, who resides at 1527 Vauxhall, New Jersey, was duly selected pursuant to N.J.S.A. 19:5-2 and 5-3 to fill said vacancy by the remaining members of the Union Democratic Municipal Committee.

Colleen Mahr  
Colleen Mahr

Dated: 2-2-18

Versie McNeil.pdf

Open in browser tab

Tony1

To Ed

Please

TONY  
908-2  
Tony1

Begin

Frc  
Da  
To:  
<at  
SulFro  
Ser  
To:  
Sut  
Mei  
JimJin  
Din

## "County Committee" Address Verification

Name: VERSIE MCNEIL  
Address: 1325 MARCELLA DRIVE  
City/State/Zip: UNION, NJ 07083  
Phone: 908-666-7097

Date: 2/14/2018

### AFFIDAVIT

To whom it may concern,

Please be advised that I, County Committeeman/woman: Same as AboveCurrently resides at: Same as Above

I understand and affirm that:

☒ I am a current County Committee man/woman for the County of Union
☐ I resigned my position as a County Committee man/woman on: \_\_\_\_\_

☒ I have not resigned, nor do I have any knowledge of my resigning as a County Committee man/woman.

Versie McNeil 2-14-18  
Signature Date

Details

Name: Versie McNeil.pdf  
Size: 4400 Route 9, Suite 1000  
Modified: 735 501 07728-7198  
Tel: 800-836-2984  
Fax: 732-308-0407  
Edwards 732-308-3314



RESIGNATION OF MEMBER OF MUNICIPAL AND COUNTY  
DEMOCRATIC COMMITTEE  
PURSUANT TO N.J.S.A. 19:13-20

Municipality: Union

Ward \_\_\_\_\_ District 42

Name of Resignee: Versie Mcneil

I hereby resign as a member of the Union Municipal  
Democratic Committee and the Union County Democratic Committee, effective  
immediately.

*Resigned signature not available*

X

*[Signature]*  
~~Signature of Resignee~~

*municipal chair signature*

Sworn and subscribed to before me

this 1<sup>st</sup> day of February, 20 18

*Erika Carter*

ACCEPTANCE OF APPOINTMENT PURSUANT TO N.J.S.A. 19:13-20

I, m Alouades Archer residing at 1527 Van Dusen Rd  
Union NJ, New Jersey, hereby accept my selection by the Union

Democratic Municipal Committee to the office of Male/Female Member of the Union

Democratic Municipal Committee and Union County Democratic

Committee for the 42nd District.

I hereby certify that I am qualified by the laws of this State to serve as a member of the  
Union Democratic Municipal Committee and the Union County  
Democratic Committee, that I am a resident of the 42nd District, that I am a member  
of the Democratic Party, and that I am not a member of or identified with any other political  
party or any political organization espousing the causes of candidates of any other political party.

Alouades Archer

Dated: 2/2/18

Sworn to and subscribed  
before me this 2nd day  
of February 2018

Diana J. Rutledge

DIANA J. RUTLEDGE  
CLERK PUBLIC OF NEW JERSEY  
Commission Expires July 13, 2020

CERTIFICATE OF SELECTION PURSUANT TO N.J.S.A. 19:13-20

1-2017-10  
2019 FEB -7 AM 11:57

I, Joseph cryan, hereby certify that:

2019 FEB -7 AM 11:57

1. I am the Chairperson of the Union Democratic Municipal Committee.

2. A vacancy has occurred in the Office of Male/Female Member of the Union Democratic Committee and the Union County Democratic Committee for the 4<sup>th</sup> District and that Archer Alourdes, who resides at 1527 Vaux Hall Road, Union, New Jersey, was duly selected pursuant to N.J.S.A. 19:5-2 and 5-3 to fill said vacancy by the remaining members of the Union Democratic Municipal Committee.

[Signature]  
Democratic Municipal Chairperson

Dated: 2/1/18

CERTIFICATE OF SELECTION PURSUANT TO N.J.S.A. 19:13-20

RECEIVED  
UNION COUNTY, NJ  
MAY 17 2018

I, Colleen Mahr, hereby certify that:

CLERK OF SUPERIOR  
COUNTY CLERK

1. I am the Chairperson of the Union County Democratic Committee.

2. I have been notified, pursuant to N.J.S.A. 19:13-20, that a vacancy occurred in the Office of Male/Female County Committee Person for the Union Township Democratic Municipal Committee and the Union County Democratic Committee for the 42nd District and that M. Haverley House, who resides at 1527 Vandyke Rd, New Jersey, was duly selected pursuant to N.J.S.A. 19:5-2 and 5-3 to fill said vacancy by the remaining members of the Union Township Democratic Municipal Committee.

Colleen Mahr  
Colleen Mahr

Dated: 2 - 2 - 18



4400 Route 9, Suite 1000  
Freehold, NJ 07728-7198  
Tel: 800-836-2994  
732-308-0400  
Fax: 732-308-3314

## "County Committee" Address Verification

Date: 2/14/2018

Name: LUCIA PRISCO  
Address: 2261 COPPER HILL DRIVE  
City/St/Zip: UNION, NJ 07083  
Phone: 908-688-2018

### AFFIDAVIT

To whom it may concern,

Please be advised that I, County Committeeman/woman Lucia Prisco

Currently resides at: \_\_\_\_\_

I understand and affirm that:

☒ I am a current County Committee man/woman for the County of Union

☐ I resigned my position as a County Committee man/woman on: \_\_\_\_\_

☒ I have not resigned, nor do I have any knowledge of my resigning as a County Committee man/woman.

Also County Committee  
Rafael Prisco  
Rafael Prisco

Signature

Date

For Lucia Prisco JH



RESIGNATION OF MEMBER OF MUNICIPAL AND COUNTY  
DEMOCRATIC COMMITTEE  
PURSUANT TO N.J.S.A. 19:13-20

RECEIVED  
MAY 11 2018  
MAY 11 2018

Municipality: Union

Ward \_\_\_\_\_ District 6

Name of Resignee: LUCIA PRISCO

I hereby resign as a member of the Union Municipal  
Democratic Committee and the Union County Democratic Committee, effective  
immediately.

ILL signature not available

X [Signature]  
Signature of Resignee

municipal chair signature

Sworn and subscribed to before me

this 1<sup>st</sup> day of February, 2018

Erika Carter

CERTIFICATE OF SELECTION PURSUANT TO N.J.S.A. 19:13-20

I, Colleen Mahr, hereby certify that:

1. I am the Chairperson of the Union County Democratic Committee.

2. I have been notified, pursuant to N.J.S.A. 19:13-20, that a vacancy occurred in the Office of Male/Female County Committee Person for the Union Democratic Municipal Committee and the Union County Democratic Committee for the 6<sup>th</sup> District and that Anthony J. DePina, who resides at 2111 Laurel St., New Jersey, was duly selected pursuant to N.J.S.A. 19:5-2 and 5-3 to fill said vacancy by the remaining members of the Union Democratic Municipal Committee.

Colleen Mahr  
Colleen Mahr

Dated: 2-2-18

CERTIFICATE OF SELECTION PURSUANT TO N.J.S.A. 19:13-20

I, Joseph cyan, hereby certify that:

1. I am the Chairperson of the Union Democratic Municipal Committee.

2. A vacancy has occurred in the Office of Male/Female Member of the Union Democratic Committee and the Union County Democratic Committee for the 6th District and that Kimberly Scott-Hayden, who resides at 2253 Copper Hill Drive, Union, New Jersey, was duly selected pursuant to N.J.S.A. 19:5-2 and 5-3 to fill said vacancy by the remaining members of the Union Democratic Municipal Committee.

J. cyan  
Democratic Municipal Chairperson

Dated: 2/1/18

UN

RECEIVED  
NOTARY PUBLIC  
FEBRUARY 7 2018  
CLERK OF SUPERIOR COURT

ACCEPTANCE OF APPOINTMENT  
PURSUANT TO N.J.S.A. 19:13-20

I, Kimberly L. Scott Hayden residing at 2253 Copper Hill Dr.  
Union, New Jersey, hereby accept my selection by the  
Union Democratic Municipal Committee to the office of  
Male/Female Member of the Union Democratic Municipal  
Committee and Union County Democratic Committee for the 6th District.

I hereby certify that I am qualified by the laws of this State to serve as a member  
of Union Democratic Municipal Committee and the Union County  
Democratic Committee, that I am a resident of the 6th District, that I am  
a member of the Democratic Party, and that I am not a member of or identified with any  
other political party or any political organization espousing the causes of candidates of  
any other political party.

X Kimberly L. Scott Hayden  
Signature of Appointee

Dated: 2/5/18

Sworn and subscribed to  
before me this 5th day  
Of February 2018.

MCKENZIE



4400 Route 9, Suite 1000  
Freehold, NJ 07728-7198  
Tel: 800-836-2994  
732-308-0400  
Fax: 732-308-3314

## "County Committee" Address Verification

Date: 2/14/2018

Name: TAMESE COHEN

Address: 285 INDIANA STREET

City/St/Zip: UNION, NJ 07083

Phone: 908-305-1260

### AFFIDAVIT

To whom it may concern,

Please be advised that I, County Committeeman/woman: Tamese Cohen

Currently resides at: AS Above

I understand and affirm that:

☒ I am a current County Committee man/woman for the County of Union

☐ I resigned my position as a County Committee man/woman on: \_\_\_\_\_

☒ I have not resigned, nor do I have any knowledge of my resigning as a County Committee man/woman.

Tamese Cohen  
Signature Date



RESIGNATION OF MEMBER OF MUNICIPAL AND COUNTY  
DEMOCRATIC COMMITTEE  
PURSUANT TO N.J.S.A. 19:13-20

RECEIVED  
UNION COUNTY CLERK  
FEBRUARY 7 2018  
11:56 AM  
CLERK

Municipality: Union

Ward \_\_\_\_\_ District 38

Name of Resignee: Tamese Cohen

I hereby resign as a member of the Union Municipal  
Democratic Committee and the Union County Democratic Committee, effective  
immediately.

*Resigned signature not available*

X *[Signature]*  
Signature of Resignee

*municipal chair signature*

Sworn and subscribed to before me

this 1st day of February, 20 18

*Erika Carter*

ACCEPTANCE OF APPOINTMENT  
PURSUANT TO N.J.S.A 19:13-20

RECEIVED  
CLERK OF SUPERIOR COURT  
FEB -7 AM 11:55  
CLERK OF SUPERIOR COURT  
COUNTY OF UNION

I, Florina A Ross, residing at 251 Indiana St  
Union, New Jersey, hereby accept my selection by the  
Union Democratic Municipal Committee to the office of  
Male/Female Member of the Union Democratic Municipal  
Committee and Union County Democratic Committee for the 30 District.

I hereby certify that I am qualified by the laws of this State to serve as a member  
of Union Democratic Municipal Committee and the Union County  
Democratic Committee, that I am a resident of the 30 District, that I am  
a member of the Democratic Party, and that I am not a member of or identified with any  
other political party or any political organization espousing the causes of candidates of  
any other political party.

x Florina A Ross  
Signature of Appointee

Dated: 2/1/2018

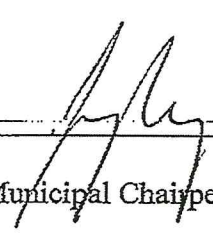
Sworn and subscribed to before me  
this 1st day of February, 2018  
Erika Carter

CERTIFICATE OF SELECTION PURSUANT TO N.J.S.A. 19:13-20

I, Joseph Cayan, hereby certify that:

1. I am the Chairperson of the Union Democratic Municipal Committee.

2. A vacancy has occurred in the Office of Male/Female Member of the Union Democratic Committee and the Union County Democratic Committee for the 38<sup>th</sup> District and that Florina Ross, who resides at 251 Indiana Street, Union, New Jersey, was duly selected pursuant to N.J.S.A. 19:5-2 and 5-3 to fill said vacancy by the remaining members of the Union Democratic Municipal Committee.

  
Democratic Municipal Chairperson

Dated: 2/1/18

CERTIFICATE OF SELECTION PURSUANT TO N.J.S.A. 19:13-20

RECEIVED  
UNION COUNTY, NJ  
JANUARY 7 AM 11:55

I, Colleen Mahr, hereby certify that:

1. I am the Chairperson of the Union County Democratic Committee.

2. I have been notified, pursuant to N.J.S.A. 19:13-20, that a vacancy occurred in the Office of Male/Female County Committee Person for the Union Township Democratic Municipal Committee and the Union County Democratic Committee for the 38 District and that Hanna Ross, who resides at 251 Indiana St, New Jersey, was duly selected pursuant to N.J.S.A. 19:5-2 and 5-3 to fill said vacancy by the remaining members of the Union Township Democratic Municipal Committee.

Colleen Mahr  
Colleen Mahr

Dated: 2-2-18