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REGULAR UNION COUNTY,  
DEMOCRATS; and candidates  
for County Committee

Plaintiff,

v.

UNION COUNTY CLERK,  
UNION COUNTY BOARD OF  
ELECTIONS CRANFORD  
MUNICIPAL CLERK

Defendants

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: UNION COUNTY

Civil Action

**VERIFIED COMPLAINT**

Plaintiffs Regular Democratic Organization of Union County, as and for their Verified  
Complaint in lieu of Prerogative Writs against Defendants, herein allege as follows:

**NATURE OF THE ACTION**

1. This is an emergent action seeking to restore a candidate whose candidacy was  
invalidated in error to the primary election ballot for the offices of members of the Union  
County Committee. The accompanying Order to Show Cause with Temporary Restraints seeks  
to restrain printing of the ballots for the Township of Cranford until this matter can be resolved.

## **PARTIES**

2. The Regular Democratic Organization of Union County, is the Democratic organization at 1508 E. St. George Avenue, 1<sup>st</sup> Floor, Linden, New Jersey.

3. Defendant Municipal Clerk of the Township of Cranford is the election official charged with accepting and determining the sufficiency of nominating petitions for the office at issue in this matter, for approving the form of ballot for races in the Township of Cranford, and for certifying that form to the County Clerk of the County of Union.

4. Defendant Union County Clerk is the official charged with determining the appearance of the primary election ballot, and with printing the ballots for the primary election in Union County, including the Township of Cranford.

5. Grace Williams is a Candidate for County Committee who received the requisite number of signors and otherwise complied with the requirements of Title 19.

## **FACTS**

6. The primary election for State, County, and Municipal offices will be held in Union County, including the Township of Cranford, on June 4, 2019 (the "Primary").

7. In accordance with N.J.S.A. 19:23-6, the nominating petition was signed by the requisite number of qualified voters.

8. Upon information and belief, other candidates did likewise.

9. Plaintiffs have been advised by the County Clerk that printing of the ballots is scheduled to begin tomorrow.

## **COUNT ONE**

10. Plaintiffs repeat the allegations contained in the foregoing paragraphs of this Verified Complaint, and reallege them as if set forth at length herein.

11. The ballots are scheduled to begin printing. Upon information and belief, a short delay in printing will not prejudice the election officials in their preparation for the election.

12. However, if the County Clerk is permitted to commence printing the ballots for the Township of Cranford prior to resolution of this dispute, the damage to Plaintiffs will be irreparable.

### **COUNT TWO**

13. Plaintiffs repeat the allegations contained in the foregoing paragraphs of this Verified Complaint, and reallege them as if set forth at length herein.

14. Candidate Grace William's candidacy was invalidated by the municipal clerk because it was alleged that she was not a registered Democrat. Because Grace Williams was an unaffiliated voter, prior to her signing the Certificate of Acceptance. Therefore, by virtue of her signing the Certificate of Acceptance, she has declared her party affiliation to be that of Democrat.

15. Grace Williams was not the circulator of the Petition. The circulator of the Petition was a registered Democrat. Therefore, there is no conflict with the affirmation set forth and signed by the circulator. The Petition was circulated by a member of the Democratic Party as set forth and sworn to in the affirmation.

**WHEREFORE**, Plaintiff seeks an order from this court:

- A. Compelling Defendants to restore the Candidacy of Grace Williams.
- B. Temporarily restraining the County Clerk from printing only those ballots for the Primary Election to be used in the Township of Cranford until the matters herein have been adjudicated.
- C. Granting such other relief as the Court deems equitable and just.

