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 Republican Committee*

<p>JONATHAN M. SAMMONS, BYRON DRISCOLL and GLOUCESTER COUNTY REPUBLICAN COMMITTEE,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>JAMES N. HOGAN, in his capacity as Clerk of the County of Gloucester; HEATHER POOLE, in her capacity as Deputy County Clerk of the County of Gloucester; STEPHANIE SALVATORE, in her capacity as Gloucester County Superintendent of Elections; and GLOUCESTER COUNTY BOARD OF ELECTIONS,</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: GLOUCESTER COUNTY</p> <p>DOCKET NO.: GLO- L –</p> <p style="text-align: center;">CIVIL ACTION</p> <p style="text-align: center;">VERIFIED COMPLAINT FOR EMERGENCY DECLARATORY, INJUNCTIVE, AND MANDAMUS RELIEF</p>
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Plaintiffs Jonathn M. Sammons, Byron Driscoll, and Gloucester County Republican
 Committee, through their counsel Marla M. DeMarcantonio, Esquire of Holston, MacDonald,
 Uzdavinis, Myles & DeMarcantonio, P.C., and Josiah Contarino, Esquire of Dhillon Law
 Group, Inc., by way of Verified Complaint against the Clerk of the County of Gloucester,

James N. Hogan, in his official capacity (“County Clerk”); Deputy County Clerk of the County of Gloucester, Heather Poole, in her official capacity (“Deputy County Clerk”); Stephanie Salvatore, in her official capacity as Gloucester County Superintendent of Elections (“Superintendent of Elections”) and the Gloucester County Board of Elections (the “Board of Elections”), alleges as follows:

PARTIES

1. Plaintiff Jonathan M. Sammons (“Sammons”) is a resident of Gloucester County, a voter in Gloucester County, served as the Gloucester County Sheriff, and is a candidate for the office of Gloucester County Board of County Commissioners in the upcoming November 4, 2025 General Election (the “Election” or “General Election”), whose name will appear on the ballot.

2. Plaintiff Byron Driscoll (“Driscoll”) is a resident of Gloucester County, is a voter in Gloucester County, and is a candidate for the office of Gloucester County Board of County Commissioners in the Election whose name will appear on the ballot.

3. Plaintiff Gloucester County Republican Committee (“GCGOP”) is the official county committee of the Republican Party in Gloucester County. In addition to managing the Republican Party’s business at the county level, the GCGOP vets, endorses and supports Republican candidates for public office at all levels of government. GCGOP spends its limited resources to fund advocacy in support of its nominees and engages in get-out-the-vote activities in support of its nominees. GCGOP represents its own interests as well as the interests of its nominees and its members, who are voters, throughout Gloucester County.

4. Defendant James N. Hogan is the current Clerk of the County of Gloucester (the “County Clerk”), who is vested with certain constitutional and statutory duties and

obligations, including designing, preparing, and printing sample ballots, machine ballots, and mail-in ballot materials, all in compliance with state law; issuing mail-in ballots; and conducting a drawing for ballot positions for elections held in Gloucester County.

5. Defendant Heather Poole is the current Deputy County Clerk of the County of Gloucester (the “Deputy County Clerk”), who is vested with certain statutory duties and obligations, specifically having the same power and authority as the County Clerk during a period of absence or disability, which includes conducting a drawing for ballot positions for elections held in Gloucester County.

6. Defendant Stephanie Salvatore is the Superintendent of Elections of the County of Gloucester (the “Superintendent of Elections”), who is vested with certain statutory duties and obligations, including the custody and control of the County’s voting machines.

7. Defendant Gloucester County Board of Elections (“Board of Elections”) is a public body which exists pursuant to N.J.S.A. 19:6-17 that is charged with, among other things, receiving, counting, investigating, curing (if necessary) and certifying vote-by-mail (sometimes referred to as “VBM”) ballots, counting, certifying and curing (if necessary) provisional ballots, counting and certifying ballots cast using voting machines and keeping custody of Gloucester County’s voting machines.

JURISDICTION AND VENUE

8. The Superior Court has jurisdiction over this election matter pertaining to ballots with respect to the General Election.


9. Venue is properly laid in Gloucester County because, as described below, the cause of action arose in Gloucester County, and the public bodies involved in this litigation exist in Gloucester County.

BACKGROUND


10. New Jersey law prescribes the uniform design of ballots in all state elections. N.J.S.A. 19:14-6 very specifically requires each County Clerk to prepare General Election ballots with “columns at the extreme left [listing] the name of each of the political parties which made nominations at the next preceding primary election[.]” N.J.S.A. 19: 14-8 requires each County Clerk to prepare General Election ballots such that “[i]n the columns of each of the political parties which made nominations [in the primary election] and in the personal choice column . . . there shall be printed the title of each office to be filled at such election” in a certain order of offices. And N.J.S.A. 19:14-12 requires the County Clerk to prepare the General Election ballot on which “[t]he name of the party first drawn shall occupy the first column at the left of the ballot, and the name of the party next drawn shall occupy the second column.” These statutory design requirements for ballots ensure uniformity for all voters across the state. These requirements are mandatory and non-discretionary.

11. In the 2024 General Election, the County Clerk designed the first page of the ballot featuring twenty-five (25) candidates for various public offices in Gloucester County. A copy of the sample ballot for the 2024 General Election is pictured below:

**OFFICIAL
MAIL-IN BALLOT
GENERAL ELECTION**
TUESDAY, NOVEMBER 5, 2024
TOWNSHIP OF DEPTFORD
DISTRICT 9



James N. Hogan
**JAMES N. HOGAN
GLOUCESTER COUNTY
CLERK**

IMPORTANT INSTRUCTIONS TO VOTER
1. Use ONLY a black or blue ink pen to mark your ballot. **CORRECT MARK** 
2. Completely fill in the oval to the right of your selections. Do not vote for more candidates than are to be elected to any office.
3. Write-in candidate box is for anyone wishing to vote for any person whose name is not printed on the ballot. Write the name of the person you wish to vote for in the appropriate (write-in) box and fill in the oval to the right.
4. If you tear, soil, deface or incorrectly mark this ballot, return it to James N. Hogan, County Clerk and obtain another ballot.

To protect your vote:
IT IS AGAINST THE LAW FOR ANYONE EXCEPT YOU THE VOTER TO MARK OR INSPECT THIS BALLOT.
However, a family member may assist you in doing so.

OFFICE TITLE	REPUBLICAN COLUMN A	DEMOCRATIC COLUMN B	NOMINATION BY PETITION COLUMN C	NOMINATION BY PETITION COLUMN D	NOMINATION BY PETITION COLUMN E	NOMINATION BY PETITION COLUMN F	NOMINATION BY PETITION COLUMN G	NOMINATION BY PETITION COLUMN H	NOMINATION BY PETITION COLUMN I	NOMINATION BY PETITION COLUMN J	NOMINATION BY PETITION COLUMN K	WRITE-IN (PERSONAL CHOICE) COLUMN L
PRESIDENTIAL ELECTORS VOTE FOR ONE	DONALD J. TRUMP J.D. VANCE REPUBLICAN	KAMALA D. HARRIS TIM WALZ DEMOCRATIC	ROBERT F. KENNEDY JR. NICOLE SHANAHAN INDEPENDENT	RACHELE FRUIT MARGARET TROWE SOCIALIST WORKERS PARTY	RANDALL A. TERRY STEPHEN E. BRODEN U.S. CONSTITUTION PARTY	JOSEPH KISHORE JERRY WHITE SOCIALIST EQUALITY	CLAUDIA DE LA CRUZ MARINA GARCIA SOCIALISM AND LIBERATION	JILL STEIN RUDOLPH WARE GREEN PARTY	CHASE OLIVER MIKE TER MAAT LIBERTARIAN PARTY			WRITE-IN (And Fill In Oval)
UNITED STATES SENATE VOTE FOR ONE	CURTIS BASHAW REPUBLICAN	ANDY KIM DEMOCRATIC		JOANNE KUNJANSKY SOCIALIST WORKERS PARTY				CHRISTINA KHALIL GREEN PARTY	KENNETH R. KAPLAN LIBERTARIAN PARTY	PATRICIA G. MOONEYHAM VOTE BETTER		WRITE-IN (And Fill In Oval)
MEMBER OF HOUSE OF REPRESENTATIVES VOTE FOR ONE	THEODORE "TEDDY" LIDDELL REPUBLICAN	DONALD NORCROSS DEMOCRATIC						ROBIN BROWNFIELD GREEN PARTY			AUSTIN JOHNSON	WRITE-IN (And Fill In Oval)
SHERIFF VOTE FOR ONE	JONATHAN M. SAMMONS REPUBLICAN	CARMEL MORINA DEMOCRATIC										WRITE-IN (And Fill In Oval)
COUNTY COMMISSIONER VOTE FOR TWO	NICHOLAS DESILVIO REPUBLICAN	TOM BIANCO DEMOCRATIC										WRITE-IN (And Fill In Oval)
	CHRISTOPHER KONAWEL REPUBLICAN	DON HEVERLY DEMOCRATIC										WRITE-IN (And Fill In Oval)

VOTE BOTH SIDES OF BALLOT

12. In the June 10, 2025 Primary Election (the “Primary Election”), the Democratic and Republican parties in Gloucester County nominated candidates for the offices Governor, General Assembly, County Commissioner and various local offices to run in the General Election.

13. The Democratic and Republican parties are currently the only two official political parties in the State of New Jersey entitled to conduct a primary election by ballot.

14. Plaintiffs Sammons and Driscoll were nominated in the Primary Election by the GCGOP to be the Republican candidates for the office of County Commissioner in the upcoming General Election.

15. The GCGOP also nominated candidates for the office of Governor, General Assembly and various local offices.

16. Several independent candidates also filed direct nominating petitions for various offices in the General Election. In total, twenty-three (23) candidates were either nominated by a political party or met the qualifications to run independently in the upcoming

General Election; two less than the number of candidates who appeared on the first page of the 2024 General Election ballot designed by the County Clerk.

17. At 3 o'clock in the afternoon on August 11, 2025, the Defendant County Clerk conducted the statutorily required drawing for ballot position for the General Election pursuant to N.J.S.A. 19:14-12.

18. The August 11, 2025 ballot draw was live streamed on the County Clerk's Facebook page.

19. During the August 11, 2025 draw, the Defendant County Clerk verbally announced that the Republican candidates drew "Column A" and that the Democratic candidates drew "Column B" consistent with past practice.

20. Upon information and belief, neither the Defendant County Clerk nor any prior Gloucester County Clerk has ever designed, printed or issued a General Election ballot in any way other than the statutorily required grid column format with each candidate receiving a major party nomination being placed in the same column.



21. On at least two (2) occasions prior to the General Election ballot draw, the Defendant County Clerk indicated that the General Election ballot would be designed as statutorily required (and not the office box format utilized in the 2025 Primary Election).

22. Chairman Wingate confirmed with the Defendant County Clerk that the 2025 General Election ballot would be formatted the same as the 2024 General Election ballot.

23. In reliance on state law and consistent historical practice, and based upon the ballot draw of Column A conducted and announced by the Defendants, and representations made by the County Clerk, and in the absence of any contrary notification of any kind from any election official, the GCGOP and its candidates produced and have disseminated printed

materials and other communications urging voters to “vote Column A.” The Plaintiffs have expended precious and limited resources informing voters to “vote Column A.”

24. On Monday, September 22, 2025, GCGOP received reports from VBM voters that the Defendant County Clerk and/or Defendant Deputy County Clerk had substantively altered the General Election ballot to separate GCGOP-nominated candidates from one another into separate “office blocks.”

OFFICIAL MAIL-IN BALLOT GENERAL ELECTION TUESDAY, NOVEMBER 4, 2025 TOWNSHIP OF DEPTFORD DISTRICT 11		GOVERNOR AND LIEUTENANT GOVERNOR VOTE FOR ONE SLATE		COUNTY COMMISSIONER VOTE FOR TWO		COUNCIL VOTE FOR FOUR	
 JAMES N. HOGAN GLOUCESTER COUNTY CLERK		JACK CIATTARELLI JAMES GANNON REPUBLICAN	<input type="radio"/>	JONATHAN M. SAMMONS REPUBLICAN	<input type="radio"/>	MARY WOOD REPUBLICAN	<input type="radio"/>
		MIKIE SHERRILL DALE G. CALDWELL DEMOCRATIC	<input type="radio"/>	BYRON DRISCOLL REPUBLICAN	<input type="radio"/>	DAVID ABER REPUBLICAN	<input type="radio"/>
		JOANNE S. KUNIANSKY CRAIG HONTIS SOCIALIST WORKERS PARTY	<input type="radio"/>	FRANK J. DIMARCO DEMOCRATIC	<input type="radio"/>	ERIK ANDERSON REPUBLICAN	<input type="radio"/>
		VIC KAPLAN BRUNO PEREIRA LIBERTARIAN PARTY	<input type="radio"/>	TOM BIANCO DEMOCRATIC	<input type="radio"/>	STEVEN MARFIA REPUBLICAN	<input type="radio"/>
		WRITE-IN (And Fill in Oval)	<input type="radio"/>	WRITE-IN (And Fill in Oval)	<input type="radio"/>	PHIL SCHOCKLIN DEMOCRATIC	<input type="radio"/>
IMPORTANT INSTRUCTIONS TO VOTER 1. Use ONLY a black or blue ink pen to mark your ballot. CORRECT MARK:  2. Completely fill in the oval to the right of your selections. Do not vote for more candidates than are to be elected to any office. 3. Write-in candidate box is for anyone wishing to vote for any person whose name is not printed on the ballot. Write the name of the person you wish to vote for in the appropriate (write-in) box and fill in the oval to the right. 4. If you tear, soil, deface or incorrectly mark this ballot, return it to James N. Hogan, County Clerk and obtain another ballot. To protect your vote: IT IS AGAINST THE LAW FOR ANYONE EXCEPT YOU THE VOTER TO MARK OR INSPECT THIS BALLOT. However, a family member may assist you in doing so.		GENERAL ASSEMBLY VOTE FOR TWO		COUNCIL UNEXPIRED VOTE FOR ONE		VOTE BOTH SIDES OF BALLOT	
		CONSTANCE DITZEL REPUBLICAN	<input type="radio"/>	MARTIN MCDONOUGH REPUBLICAN	<input type="radio"/>		
		NILSA GONZALEZ REPUBLICAN	<input type="radio"/>	JIM NOCE DEMOCRATIC	<input type="radio"/>		
		WILLIAM F. MOEN JR. DEMOCRATIC	<input type="radio"/>	WRITE-IN (And Fill in Oval)	<input type="radio"/>		
		WILLIAM W. SPEARMAN DEMOCRATIC	<input type="radio"/>	WRITE-IN (And Fill in Oval)	<input type="radio"/>		
ROBIN BROWNFIELD GREEN PARTY	<input type="radio"/>						
WRITE-IN (And Fill in Oval)	<input type="radio"/>						
WRITE-IN (And Fill in Oval)	<input type="radio"/>						

25. Plaintiffs, Sammons and Driscoll, candidates of the Republican Party who have a statutory right to be listed and associated with each other within the same “Republican” column on the ballot—are listed in order in separate office blocks, without being placed in any consistent ballot position with Republican candidates running for other offices.

26. The Defendant County Clerk failed to design the General Election Ballot in a grid format with columns of candidates for each political party and rows for each office in the order specified by statute. The New Jersey Globe reports that a “ranking Democrat confirmed that the party believed their chances of holding the Assembly and County

Commissioner seats improved with an office block ballot.” *See* David Wildstein, *Gloucester uses office block ballots in general election*, New Jersey Globe, <https://newjerseyglobe.com/local/gloucester-uses-office-block-ballots-in-general-election/> (last visited Sept. 25, 2025)

27. As a result of the Defendants’ unlawful change to the ballot design, Plaintiffs face irreparable harm and voters will be confused. The GCGOP and the candidates who spent limited resources on communications saying “vote Column A” cannot recoup those funds or resources. The resources of the GCGOP and candidates are limited and are inadequate to re-educate voters. It is not possible to contact every voter who has read these communications to inform them that the Gloucester ballot is non-conforming with state law. The result is significant voter confusion.

28. Vote by mail ballots were mailed out on or about September 20, 2025, with the recipient voters having no knowledge of a change in the design of the ballot, no educational information about the new design being published with the ballot, nor any notice on the County Clerk’s website or Facebook page.

29. On September 22, 2025, the Plaintiffs discovered that the Defendant County Clerk removed the video of the August 11th ballot drawing from his public social media page.

30. As a result, every voter who received a vote by mail ballot from the Defendant County Clerk was provided with a ballot that violates the clear and unambiguous provisions of N.J.S.A. 19:14-1, et. seq.

31. To date, the Defendant County Clerk has failed to confirm that these errors will be rectified.

FIRST COUNT

(VIOLATION OF N.J.S.A. 19:14-6, N.J.S.A. 19:14-8, N.J.S.A. 19:14-10, AND N.J.S.A. 19:14-12
– POSITION OF CANDIDATES’ AND PARTIES’ NAMES ON BALLOT)

32. Plaintiffs hereby repeat and incorporate the allegations contained in the preceding paragraphs as if they were set forth herein a length.

33. N.J.S.A. 19:14-6 requires the County Clerk to prepare General Election ballots with “columns at the extreme left [listing] the name of each of the political parties which made nominations at the next preceding primary election[.]”

34. The State of New Jersey Department of State certified that the two political parties designed pursuant to N.J.S.A. 19:12-1 are the Democratic Party and the Republican Party. (Exhibit B).

35. N.J.S.A. 19:14-8 requires the County Clerk to prepare General Election ballots such that “[i]n the columns of each of the political parties which made nominations [in the primary election] and in the personal choice column . . . there shall be printed the title of each office to be filled at such election” in the following specified order:

[E]lectors of President and Vice-President of the United States; member of the United States Senate; Governor; member of the House of Representatives; member of the State Senate; members of the General Assembly; county executive, in counties that have adopted the county executive plan of the “Optional County Charter Law,” P.L.1972, c.154 (C.40:41A-1 et seq.); sheriff; county clerk; surrogate; register of deeds and mortgages; county supervisor; members of the board of chosen freeholders; coroners; mayor and members of municipal governing bodies, and any other titles of office.

[Id.]

36. N.J.S.A. 19:14-10 requires the County Clerk to prepare General Election ballots such that the “title[s] of each office for which nominations by petition have been made . . .

shall be arranged” by the same method and in the same order as titles of offices for which nominations have been made by primary election, pursuant to N.J.S.A. 19:14-8.

37. N.J.S.A. 19:14-12 requires the County Clerk to prepare the General Election ballot with “[t]he name of the party first drawn shall occupy the first column at the left of the ballot, and the name of the party next drawn shall occupy the second column.”

38. The language of the above statutes is clear and unambiguous and speaks in the imperative as to the obligations of the County Clerk to design the ballot according to strict standards. These statutory requirements are mandatory and non-discretionary.

39. The General Election Ballot should have been designed pursuant to the August 11, 2025 drawing with the Republican candidates in column A and the Democratic candidates in column B.

40. The County Clerk does not have discretion to design a General Election ballot in a manner contrary to the applicable statutory provisions.

41. In August 2024, the Cumberland County Clerk similarly attempted to alter the statutory design of the General Election Ballot at the ballot position drawing. Litigation was promptly filed by the Cumberland County Republican Party and its candidates for County Commissioner. As a result, the Cumberland County Clerk ultimately agreed to redraw the ballot positions and redesign the ballot in conformity with the statutory requirements.

42. In contrast, Defendant County Clerk deliberately withheld disclosure of the newly redesigned ballot, both at the ballot position drawing and at all times prior to mailing the VBMs, in a calculated effort to avoid the same legal challenges encountered in Cumberland County.

43. As described in the preceding paragraphs, the 2025 Ballot designed by the

County Clerk violates N.J.S.A. 19:14-6, N.J.S.A. 19:14-8, N.J.S.A. 19:14-10, and N.J.S.A. 19:14-12, and the County Clerk has thus violated these statutes in the designing, preparing, and printing of the ballot.

44. Upon information and belief, the Defendant County Clerk intentionally redesigned the ballot in a manner that prevented the Republican candidates from being placed directly under the Republican Governor candidate's name, thereby prohibiting candidates of the same party to associate.

45. As a result, the individual Plaintiffs were not placed in the statutorily required "Republican" column on the General Election ballot with all other candidates nominated by the Plaintiff GCGOP.

46. Plaintiffs Sammons and Driscoll are in a separate box on the ballot from both the Republican Governor Candidate and Republican Assembly candidates.

47. As a result, the other candidates nominated by the GCGOP for other offices are similarly scattered around the ballot and not placed on the required "Republican" column.

WHEREFORE, the Plaintiffs hereby demand Judgment against Defendants as follows:

1) Declaring that the 2025 General Election Ballot printed by Defendants violates state law and is null and void for further dissemination, and enjoining the County Clerk, Superintendent of Elections, and Board of Elections from printing or mailing any additional unlawful vote-by-mail ballots effective as of the date of the Order in this action;

2) Enjoining and restraining the Superintendent of Elections and Board of Elections from programming any election software or voting machines for either Early Voting or Election Day voting based upon the unlawful ballot design;

3) Compelling the County Clerk to re-design the General Election Ballot to conform with the August 11, 2025 ballot drawing, placing Republican candidates in Column A and Democratic candidates in Column B, and to comply with all applicable and mandatory statutory provisions within three (3) business days of the date of the Order in this action;

4) Directing that any Vote-by-Mail ballot applications received on or after the date of the Order in this action shall be held until the re-designed ballot with the necessary statutory requirements has been completed and that version of the vote by mail ballot shall be mailed moving forward;

5) Ordering that all sample ballots to be mailed on October 22, 2025 shall reflect the re-designed ballot that conforms with state law;

6) Ordering that all voting machines and tabulators to be used for Early Voting and Election Day voting shall be programmed to conform to the corrected, re-designed and lawful ballot;

7) Compelling the Superintendent of Elections and the Board of Elections to implement two (2) separate tabulation systems for Vote-by-Mail ballots: one for ballots already returned or to be returned on the unlawful ballot design, and one for ballots cast on the corrected, re-designed ballot;

8) An award of reasonable attorneys' fees and costs; and

9) Such other relief as the Court may deem equitable and just.

SECOND COUNT

(MANDAMUS RELIEF)

48. Plaintiffs repeat and reassert all the allegations set forth in the foregoing

paragraphs as if set forth herein at length.

49. N.J.S.A. 19:14-6 requires the County Clerk to prepare General Election ballots with “columns at the extreme left [listing] the name of each of the political parties which made nominations at the next preceding primary election[.]” N.J.S.A. 19:14-8 requires each County Clerk to prepare General Election ballots such that “[i]n the columns of each of the political parties which made nominations [in the primary election] and in the personal choice column . . . there shall be printed the title of each office to be filled at such election” in a certain order of offices. And N.J.S.A. 19:14-12 requires the County Clerk to prepare the General Election ballot with “[t]he name of the party first drawn shall occupy the first column at the left of the ballot, and the name of the party next drawn shall occupy the second column.”

50. The ballot design requirements of these statutes are mandatory and non-discretionary. They ensure that all voters in the state vote on uniformly designed ballots.

51. By violating the mandatory and non-discretionary requirements of state law in the design of Gloucester County ballots, the Defendants have breached a non-discretionary duty.

WHEREFORE, the Plaintiffs hereby demand Judgment against Defendants as follows:

- 1) Declaring that the 2025 General Election Ballot printed by Defendants violates state law and is null and void for further dissemination, and enjoining the County Clerk, Superintendent of Elections, and Board of Elections from printing or mailing any additional unlawful vote-by-mail ballots effective as of the date of the Order in this action;

2) Enjoining and restraining the Superintendent of Elections and Board of Elections from programming any election software or voting machines for either Early Voting or Election Day voting based upon the unlawful ballot design;

3) Compelling the County Clerk to re-design the General Election Ballot to conform with the August 11, 2025 ballot drawing, placing Republican candidates in Column A and Democratic candidates in Column B, and to comply with all applicable and mandatory statutory provisions within three (3) business days of the date of the Order in this action;

4) Directing that any Vote-by-Mail ballot applications received on or after the date of the Order in this action shall be held until the re-designed ballot with the necessary statutory requirements has been completed and that version of the vote by mail ballot shall be mailed moving forward;

5) Ordering that all sample ballots to be mailed on October 22, 2025 shall reflect the re-designed ballot that conforms with state law;

6) Ordering that all voting machines and tabulators to be used for Early Voting and Election Day voting shall be programmed to conform to the corrected, re-designed and lawful ballot;

7) Compelling the Superintendent of Elections and the Board of Elections to implement two (2) separate tabulation systems for Vote-by-Mail ballots: one for ballots already returned or to be returned on the unlawful ballot design, and one for ballots cast on the corrected, re-designed ballot;

8) An award of reasonable attorneys' fees and costs; and

9) Such other relief as the Court may deem equitable and just.

THIRD COUNT

(VIOLATION OF THE FUNDAMENTAL RIGHT TO VOTE)

52. Plaintiffs repeat and reassert all the allegations set forth in the foregoing paragraphs as if set forth herein at length.

53. The County Clerk's failure to follow the unambiguous requirements of Title 19 for drawing ballot position denies Plaintiffs the ballot position that they are statutorily entitled to and imposes a severe burden on the fundamental right to vote for a candidate for elective office as guaranteed by the New Jersey Constitution art. 2, § 1, ¶ 3 and the Fourteenth Amendment, and as implemented by N.J.S.A. 10:6-2(c) of the New Jersey Civil Rights Act.

54. The constitutional and statutory provisions set forth above are intended to protect the fundamental right to vote and place clear obligations on the part of the County Clerk to design the General Election Ballot in an organized manner so that candidates from the same political party are listed together within the same column in ballot positions determined by a process set forth by statute, so as to avoid the likelihood of voter confusion and to support a clear and consistent ballot design.

55. As a result of the County Clerk's unlawful actions, the General Election ballot is confusing, gives inconsistent ballot positions to candidates from the same political parties, increases the likelihood that voters will be misled and confused by the scattered ballot position of candidates from the same political party, and increases the risk that voters' rights to make rational, informed decisions in the 2025 General Election will be disturbed.

WHEREFORE, the Plaintiffs hereby demand Judgment against Defendants as follows:

- 1) Declaring that the 2025 General Election Ballot printed by Defendants violates state law and is null and void, and enjoining the County Clerk, Superintendent

of Elections, and Board of Elections from printing or mailing any additional unlawful vote-by-mail ballots effective as of the date of the Order in this action;

2) Enjoining and restraining the County Clerk, Superintendent of Elections, and Board of Elections from programming any election software or voting machines for either Early Voting or Election Day voting based upon the unlawful ballot design;

3) Compelling the County Clerk to re-design the General Election Ballot to conform with the August 11, 2025 ballot drawing, placing Republican candidates in Column A and Democratic candidates in Column B, and to comply with all applicable and mandatory statutory provisions within three (3) days of the date of the Order in this action;

4) Directing that any Vote-by-Mail ballot applications received on or after the date of the Order in this action shall be held, and that only the re-designed ballot conforming with statutory requirements shall be mailed moving forward;

5) Ordering all sample ballots to be mailed on October 22, 2025, shall reflect the re-designed ballot that conforms with state law;

6) Ordering that all voting machines and tabulators to be used for early voting and Election Day voting shall be programmed to conform to the corrected, re-designed and lawful ballot;

7) Compelling the Superintendent of Elections and the Board of Elections to implement two (2) separate tabulation systems for Vote-by-Mail ballots: one for ballots already returned or to be returned on the unlawful ballot design, and one for ballots cast on the corrected, re-designed ballot;

- 8) An award of reasonable attorneys' fees and costs; and
- 9) Such other, relief as the Court may deem equitable and just.

FOURTH COUNT

(VIOLATION OF THE EQUAL PROTECTION CLAUSE OF THE FOURTEENTH AMENDMENT OF THE UNITED STATES CONSTITUTION AND THE NEW JERSEY CONSTITUTION)

56. Plaintiffs repeat and reassert all of the allegations set forth in the foregoing paragraphs as if set forth herein at length.

57. The County Clerk's failure to follow the unambiguous requirements of Title 19 for drawing ballot position denies Plaintiffs the ballot position that they are statutorily entitled to and subjects voters within Gloucester County to a disparate and unequal opportunity to vote in the same manner that all other voters in New Jersey are entitled to under New Jersey law regarding ballot design.

58. Accordingly, Defendants' violation of law violates the Equal Protection Clause of the Fourteenth Amendment and the New Jersey Constitution.

WHEREFORE, the Plaintiffs hereby demand Judgment against Defendants as follows:

- 1) Declaring that the 2025 General Election Ballot printed by Defendants violates state law and is null and void, and enjoining the County Clerk, Superintendent of Elections, and Board of Elections from printing or mailing any additional unlawful vote-by-mail ballots effective as of the date of the Order in this action;
- 2) Enjoining and restraining the County Clerk, Superintendent of Elections, and Board of Elections from programming any election software or voting machines for either Early Voting or Election Day voting based upon the erroneous ballot design;

3) Compelling the County Clerk to re-design the General Election Ballot to conform with the August 11, 2025 ballot drawing, placing Republican candidates in Column A and Democratic candidates in Column B, and to comply with all applicable and mandatory statutory provisions within three (3) days of the date of the Order in this action;

4) Directing that any Vote-by-Mail ballot applications received on or after the date of the Order in this action shall be held, and that only the re-designed ballot conforming with statutory requirements shall be mailed moving forward;

5) Ordering all sample ballots to be mailed on October 22, 2025, shall reflect the re-designed ballot that conforms with state law;

6) Ordering that all voting machines and tabulators to be used for early voting and Election Day voting shall be programmed to conform to the corrected, re-designed and lawful ballot;

7) Compelling the Superintendent of Elections and the Board of Elections to implement two (2) separate tabulation systems for Vote-by-Mail ballots: one for ballots already returned or to be returned on the unlawful ballot design, and one for ballots cast on the corrected, re-designed ballot;

8) An award of reasonable attorneys' fees and costs; and

9) Such other, relief as the Court may deem equitable and just.

FIFTH COUNT

(VIOLATION OF THE RIGHT OF ASSOCIATION)

59. Plaintiffs repeat and reassert all of the allegations set forth in the foregoing paragraphs as if set forth herein at length.

60. Article I, Section 6 and Section 18 of the New Jersey Constitution and the First Amendment to the United States Constitution protect the right of free speech and association.

61. State law recognizes that right and requires candidates nominated by an official political party to be listed in a column on a General Election Ballot.

62. Each of the individual Plaintiffs is entitled to exercise those associational rights by appearing on the General Election Ballot in the same columns as all other Republican candidates.

63. The GCGOP is entitled to exercise those associational rights by having all of the candidates nominated in the Primary Election appear in the same column on the General Election Ballot.

64. The ballot designed by the County Clerk violates these associational rights by failing to list Plaintiffs within a single dedicated “Republican” ballot column contrary to the unambiguous requirements of applicable statutes governing ballot design.

WHEREFORE, the Plaintiffs hereby demand Judgment against Defendants as follows:

1) Declaring that the 2025 General Election Ballot printed by Defendants violates state law and is null and void, and enjoining the County Clerk, Superintendent of Elections, and Board of Elections from printing or mailing any additional unlawful vote-by-mail ballots effective as of the date of the Order in this action;

2) Enjoining and restraining the County Clerk, Superintendent of Elections, and Board of Elections from programming any election software or voting machines for either Early Voting or Election Day voting based upon the unlawful ballot design;

3) Compelling the County Clerk to re-design the General Election Ballot to conform with the August 11, 2025 ballot drawing, placing Republican candidates in Column A and Democratic candidates in Column B, and to comply with all applicable and mandatory statutory provisions within three (3) days of the date of the Order in this action;

4) Directing that any Vote-by-Mail ballot applications received on or after the date of the Order in this action shall be held, and that only the re-designed ballot conforming with statutory requirements shall be mailed moving forward;

5) Ordering all sample ballots to be mailed on October 22, 2025, shall reflect the re-designed ballot that conforms with state law;

6) Ordering that all voting machines and tabulators to be used for early voting and Election Day voting shall be programmed to conform to the corrected, re-designed and lawful ballot;

7) Compelling the Superintendent of Elections and the Board of Elections to implement two (2) separate tabulation systems for Vote-by-Mail ballots: one for ballots already returned or to be returned on the unlawful ballot design, and one for ballots cast on the corrected, re-designed ballot;

8) An award of reasonable attorneys' fees and costs; and

9) Such other, relief as the Court may deem equitable and just.

SIXTH COUNT

(VIOLATION OF THE NEW JERSEY CIVIL RIGHTS ACT)

65. Plaintiffs repeat and reassert all of the allegations set forth in the foregoing paragraphs as if set forth herein at length.

66. The New Jersey Civil Rights Act provides relief to any person who has been deprived or interfered with the enjoyment of any substantive due process or equal protection rights, privileges or immunities secured by the federal and state constitutions or implementing laws.

67. As described in the foregoing paragraphs, Defendant County Clerk deprived or interfered with Plaintiffs' exercise of rights protected by the state and federal constitution, and the laws of New Jersey.

68. Defendant County Clerk and/or Defendant Deputy County Clerk acted under the color of state law when they violated Plaintiffs' rights.

69. As a result of the Defendant County Clerk's and/or the Defendant Deputy County Clerk's illegal actions, Plaintiffs have been damaged.

WHEREFORE, the Plaintiffs hereby demand Judgment against Defendants as follows:

1) Declaring that the 2025 General Election Ballot printed by Defendants violates state law and is null and void, and enjoining the County Clerk, Superintendent of Elections, and Board of Elections from printing or mailing any additional unlawful vote-by-mail ballots effective as of the date of the Order in this action;

2) Enjoining and restraining the County Clerk, Superintendent of Elections, and Board of Elections from programming any election software or voting machines for either Early Voting or Election Day voting based upon the unlawful ballot design;

3) Compelling the County Clerk to re-design the General Election Ballot to conform with the August 11, 2025 ballot drawing, placing Republican candidates in Column A and Democratic candidates in Column B, and to comply with all applicable

and mandatory statutory provisions within three (3) days of the date of the Order in this action;

4) Directing that any Vote-by-Mail ballot applications received on or after the date of the Order in this action shall be held, and that only the re-designed ballot conforming with statutory requirements shall be mailed moving forward;

5) Ordering all sample ballots to be mailed on October 22, 2025, shall reflect the re-designed ballot that conforms with state law;

6) Ordering that all voting machines and tabulators to be used for early voting and Election Day voting shall be programmed to conform to the corrected, re-designed and lawful ballot;

7) Compelling the Superintendent of Elections and the Board of Elections to implement two (2) separate tabulation systems for Vote-by-Mail ballots: one for ballots already returned or to be returned on the unlawful ballot design, and one for ballots cast on the corrected, re-designed ballot;

8) An award of reasonable attorneys' fees and costs; and

9) Such other, relief as the Court may deem equitable and just.

Date: September 26, 2025

Respectfully submitted,

**HOLSTON, MacDONALD, UZDAVINIS,
MYLES & DeMARCANTONIO**

By: /s/ Marla M. DeMarcantonio
Marla M. DeMarcantonio, Esq.

DHILLON LAW GROUP INC.

By: /s/ Josiah Contarino
Josiah Contarino, Esq.

Attorneys for Plaintiffs

DESIGNATION OF TRIAL COUNSEL

Plaintiffs hereby designates Marla M. DeMarcantonio, Esquire and Josiah Contarino, Esquire as trial counsel.

**HOLSTON, MacDONALD, UZDAVINIS,
MYLES & DeMARCANTONIO**

By: /s/ Marla M. DeMarcantonio
Marla M. DeMarcantonio, Esq.

DHILLON LAW GROUP INC.

By: /s/ Josiah Contarino
Josiah Contarino, Esq.

Attorneys for Plaintiffs

CERTIFICATION OF NO OTHER ACTIONS

Pursuant to R. 4:5-1, it is hereby stated that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding to the best of my knowledge and belief. To the best of my belief, no other action or arbitration proceeding is pending or contemplated. Further, other than the parties set forth in this pleading, I know of no other parties that should be joined in the above action. In addition, I recognize the continuing obligation of each party to file and serve on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

**HOLSTON, MacDONALD, UZDAVINIS,
MYLES & DeMARCANTONIO**

By: /s/ Marla M. DeMarcantonio
Marla M. DeMarcantonio, Esq.

DHILLON LAW GROUP INC.

By: /s/ Josiah Contarino
Josiah Contarino, Esq.

Attorneys for Plaintiffs


VERIFICATION

Jonathan M. Sammons, of full age, hereby certifies as follows:

1. I am the former Gloucester County Sherriff and was on the general election ballot of November 2024. I am a current Candidate for the Gloucester County Board of County Commissioners and one of the Plaintiffs in this action. All of the facts stated in the Verified Complaint to which this Verification is attached are true, and as to those facts that are alleged on information and belief in those paragraphs, I believe those facts to be true.

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

Dated: September 25, 2025



JONATHAN M. SAMMONS

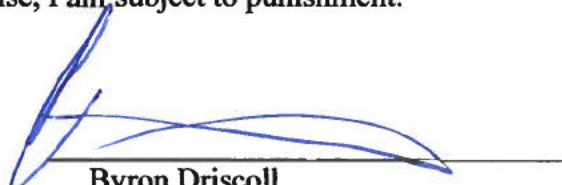
VERIFICATION

Byron Driscoll, of full age, hereby certifies as follows:

1. I am a Candidate for Gloucester County Board of County Commissioners and one of the Plaintiffs in this action. All of the facts stated in the Verified Complaint to which this Verification is attached are true, and as to those facts that are alleged on information and belief in those paragraphs, I believe those facts to be true.

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

Dated: September 25, 2025



Byron Driscoll

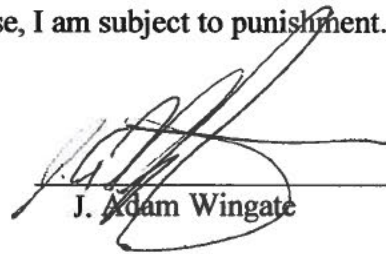
VERIFICATION

J. Adam Wingate, of full age, hereby certifies as follows:

1. I am the Chairman of the Gloucester County Republican Committee ("GCGOP"), one of the Plaintiffs in this action. All of the facts stated in the Verified Complaint to which this Verification is attached are true, and as to those facts that are alleged on information and belief in those paragraphs, I believe those facts to be true.

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

Dated: September 25, 2025



J. Adam Wingate

**HOLSTON, MacDONALD, UZDAVINIS
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*Attorneys for Plaintiffs Jonathan M. Sammons, Byron Driscoll and the Gloucester County
 Republican Committee*

<p>JONATHAN M. SAMMONS, BYRON DRISCOLL AND GLOUCESTER COUNTY REPUBLICAN COMMITTEE,</p> <p>PLAINTIFFS,</p> <p>V.</p> <p>JAMES N. HOGAN, IN HIS CAPACITY AS CLERK OF THE COUNTY OF GLOUCESTER; HEATHER POOLE, IN HER CAPACITY AS DEPUTY COUNTY CLERK OF THE COUNTY OF GLOUCESTER; STEPHANIE SALVATORE, IN HER CAPACITY AS GLOUCESTER COUNTY SUPERINTENDENT OF ELECTIONS; AND GLOUCESTER COUNTY BOARD OF ELECTIONS,</p> <p>DEFENDANTS.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: GLOUCESTER COUNTY</p> <p>DOCKET NO.: GLO – L –</p> <p>CIVIL ACTION</p> <p>ORDER TO SHOW CAUSE WITH TEMPORARY RESTRAINTS PURSUANT TO <u>RULE</u> 4:52</p>
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THIS MATTER being brought before the Court by Marla M. DeMarcantonio, Esquire of Holston, MacDonald, Uzdavinis, Myles & DeMarcantonio, P.C., and Josiah Contarino, Esquire of Dhillon Law Group Inc., attorneys for Plaintiffs, seeking relief by way of Order to Show Cause pursuant to R. 4:52-1, based upon the facts set forth in the Verified Complaint filed

herewith; and it appearing from the specific facts shown by affidavit or verified complaint that immediate and irreparable damage will probably result to the Plaintiffs before notice can be given and a hearing held; and the Court having determined that this matter may be commenced by order to show cause as a summary proceeding and for good cause shown;

1. **IT IS** on this _____ day of September 2025, **ORDERED** that the Defendants, Clerk of the County of Gloucester, James N. Hogan, in his official capacity (“County Clerk”); Deputy County Clerk of the County of Gloucester, Heather Poole, in her official capacity (“Deputy County Clerk”); Stephanie Salvatore, in her official capacity as Gloucester County Superintendent of Elections (“Superintendent of Elections”) and the Gloucester County Board of Elections (the “Board of Elections”), shall appear and show cause before the Superior Court at the Cumberland County Courthouse, located at North Broad Street, Woodbury , New Jersey 08096, at 9:00 o’clock a.m., or as soon thereafter as counsel may be heard, on the _____ day of _____ 2025, why an Order should not be entered providing the following relief:

- A. DECLARING that the 2025 General Election Ballot printed by Defendants violates state law and is null and void for further dissemination, and enjoining the County Clerk, Superintendent of Elections, and Board of Elections from printing or mailing any additional unlawful vote-by-mail ballots effective as of the date of this Order;
- B. ENJOINING AND RESTRAINING the Superintendent of Elections and Board of Elections from programming any election software or voting machines for either Early Voting or Election Day voting based upon the unlawful ballot design;
- C. COMPELLING the County Clerk to re-design the General Election Ballot to conform with the August 11, 2025 ballot drawing, placing Republican candidates in Column A

and Democratic candidates in Column B, and to comply with all applicable and mandatory statutory provisions within three (3) business days of the date of this Order;

- D. DIRECTING that any Vote-by-Mail ballot applications received on or after the date of this Order shall be held until the re-designed ballot with the necessary statutory requirements has been completed and that version of the vote by mail ballot shall be mailed moving forward;
- E. DIRECTING the Clerk that all sample ballots to be mailed on October 22, 2025 shall reflect the re-designed ballot that conforms with state law;
- F. DIRECTING the Board of Elections and Superintendent Election that all voting machines and tabulators to be used for Early Voting and Election Day voting shall be programmed to conform to the corrected, re-designed and lawful ballot;
- G. COMPELLING the Superintendent of Elections and the Board of Elections to implement two (2) separate tabulation systems for Vote-by-Mail ballots: one for ballots already returned or to be returned on the unlawful ballot design, and one for ballots cast on the corrected, re-designed ballot;
- H. AWARDING reasonable attorneys' fees and costs; and
- I. SUCH OTHER, relief as the Court may deem equitable and just.

2 IT IS further **ORDERED** that pending the return date set forth herein, Defendant James N Hogan, in his capacity as Gloucester County Clerk; Defendant Heather Poole, in her capacity as Deputy County Clerk; Stephanie Salvatore, in her capacity as Superintendent of Elections; and the Gloucester County Board of Elections, are hereby **TEMPORARILY ENJOINED** from:

- A. Printing or causing to be printed any sample ballot, emergency ballot, vote by mail ballot, or any other type of ballot or any other type of election material based upon the General Election Ballot designed by the County Clerk following the August 11, 2025 drawing for ballot position;
- B. Distributing or causing to be distributed any sample ballot, emergency ballot, vote by mail ballot, or any other type of ballot or any other type of election material based upon the General Election Ballot designed by the County Clerk following the August 11, 2025 drawing for ballot position; and
- C. Programming or causing to be programmed any election software or voting machine based upon the General Election Ballot designed by the County Clerk following the August 11, 2025 drawing for ballot position.

IT IS further **ORDERED** that:

3 A copy of this order to show cause, verified complaint and all supporting affidavits or certifications submitted in support of this application be served upon the Defendants within ____ days of the date hereof, which service may be performed via email or overnight mail with tracking;

4 The Plaintiffs must file with the Court their proof of service of the pleadings on the Defendants no later than one (1) day before the return date;

5 Defendants may file and serve any written answer and opposition papers to this order to show cause and the relief requested in the verified complaint and proof of service of the same by _____. The answer and opposition papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the papers must be sent directly to the chambers of the Judge assigned to the case;

6 The Plaintiff may file and serve any written reply to the Defendants' order to show cause opposition by _____. 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 the Judge assigned to this case;

7 If the Defendants do 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 Plaintiffs file a proof of service and a proposed form of order at least three days prior to the return date;

8 If the Plaintiffs have not already done so, a proposed form of order addressing the relief sought on the return date must be submitted to the Court no later than three (3) days before the return date.

9 Defendants take notice that the Plaintiffs have 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 and opposition papers and proof of service before the return date of the order to show cause.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at:

http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. Unless exempt from paying the filing fee, include a \$175 filing fee payable to the "Treasurer, State of New Jersey." You must also send a copy of your answer and opposition papers to the Plaintiff's attorney whose name and address appear above, or to the Plaintiff, if no attorney is named above. A telephone

call will not protect your rights; you must file and serve your answer and opposition papers (with the fee) or judgment may be entered against you by default.

If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). 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 directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at:

http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf;

10. The Court will entertain argument, but not testimony, on the return date of the order to show cause, unless the Court and parties are advised to the contrary no later than 7 days before the return date;

11. The Defendants may move to dissolve or modify the temporary restraints herein contained on two (2) days' notice;

Honorable Benjamin C. Telsey, A.J.S.C.

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Attorney for Plaintiffs Jonathan M. Sammons, Byron Driscoll and the Gloucester County Republican Committee

<p>JONATHAN M. SAMMONS, BYRON DRISCOLL and GLOUCESTER COUNTY REPUBLICAN COMMITTEE,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>JAMES N. HOGAN, in his capacity as Clerk of the County of Gloucester; HEATHER POOLE, in her capacity as Deputy County Clerk of the County of Gloucester; STEPHANIE SALVATORE, in her capacity as Gloucester County Superintendent of Elections; and GLOUCESTER COUNTY BOARD OF ELECTIONS,</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: CUMBERLAND COUNTY</p> <p>DOCKET NO.: CUM – L –</p> <p style="text-align: center;">CIVIL ACTION</p> <p style="text-align: center;">FINAL ORDER</p>
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THIS MATTER being brought before the Court by Marla M. DeMarcantonio, Esquire of Holston, MacDonald, Uzdavinis, Myles & DeMarcantonio, P.C., and Josiah Contarino, Esquire of Dhillon Law Group Inc., attorneys for Plaintiffs, seeking relief by way of Order to Show Cause, based upon the facts set forth in the Verified Complaint filed herewith; and notice of this application having been provided to Defendant James N. Hogan, in his capacity as Clerk of the County of Gloucester County, Heather Poole, in her capacity as Deputy County Clerk of

Gloucester County, Stephanie Salvatore, in her capacity as Gloucester County Superintendent of Elections and Gloucester County Board of Elections via Counsel electronically upon consent due to the expedited nature of this matter.

IT IS on this _____ day of _____ 2025 **ORDERED** as follows,

1. **DECLARING** that the 2025 General Election Ballot printed by Defendants violates state law and is null and void, and enjoining the County Clerk, Superintendent of Elections, and Board of Elections from printing or mailing any additional unlawful vote-by-mail ballots effective as of the date of this Order;
2. **ENJOINING AND RESTRAINING** the Superintendent of Elections and Board of Elections from programming any election software or voting machines for either Early Voting or Election Day voting based upon the unlawful ballot design;
3. **COMPELLING** the County Clerk to re-design the General Election Ballot to conform with the August 11, 2025 ballot drawing, placing Republican candidates in Column A and Democratic candidates in Column B, and to comply with all applicable and mandatory statutory provisions within three (3) business days of the date of this Order;
4. **DIRECTING** that any Vote-by-Mail ballot applications received on or after the date of this Order shall be held until the re-designed ballot with the necessary statutory requirements has been completed and that version of the vote by mail ballot shall be mailed moving forward;
5. **DIRECTING** the Clerk that all sample ballots to be mailed on October 22, 2025 shall reflect the re-designed ballot that conforms with state law;
6. **DIRECTING** the Board of Elections and Superintendent Election that all voting machines and tabulators to be used for Early Voting and Election Day voting shall

be programmed to conform to the corrected, re-designed ballot uploaded and utilized; and

7. **COMPELLING** the Superintendent of Elections and the Board of Elections to implement two (2) separate tabulation systems for Vote-by-Mail ballots: one for ballots already returned or to be returned on the unlawful ballot design, and one for ballots cast on the corrected, re-designed ballot;
8. **AWARDING** reasonable attorneys' fees and costs; and
9. **SUCH OTHER**, relief as the Court may deem equitable and just.

10. **ORDERED** that on _____ 2025, at 3:00 pm, Defendant James N. Hogan, in his official capacity as Gloucester County Clerk, Defendant Heather Poole, in her official capacity as Deputy County Clerk shall design and prepare, a new revised General Election Ballot for the November 4, 2025 General Election in the County of Gloucester that conforms to all legal requirements, including but not limited to those set forth in N.J.S.A. 19:14-6, N.J.S.A. 19:14-8, N.J.S.A. 19:14-10, and N.J.S.A. 19:14-12, with all candidates of a particular party shall be listed in the same column, in descending order of office as set forth in N.J.S.A. 19:14-8 and N.J.S.A. 19:14-10, and that the two columns at the extreme left of the ballot ("Column A" and "Column B") are designated, respectively, as the "Republican" and "Democratic" columns;

11. **ORDERED** that Plaintiffs, as prevailing parties in this action filed pursuant to the New Jersey Civil Rights Act, N.J.S.A. 10:6-2, are entitled to an award of reasonable counsel fees and costs, which shall be established by subsequent Court Order upon the submission of a Certification of Services by Plaintiffs' counsel within thirty (30) days of the entry of this Order, which Defendants shall have the ability to response to within ten (10) days of the filing of said certification; and it is further

12. **ORDERED** that a copy of this Order shall be deemed served upon all parties of record upon filing on eCourts.

HON. BENJAMIN C. TELSEY, A.J.S.C.

OPPOSED _____

UNOPPOSED _____

**HOLSTON, MacDONALD, UZDAVINIS
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*Attorney for Plaintiffs Jonathan M. Sammons, Byron Driscoll and the Gloucester County
Republican Committee*

<p>JONATHAN M. SAMMONS, BYRON DRISCOLL and GLOUCESTER COUNTY REPUBLICAN COMMITTEE,</p> <p>Plaintiffs,</p> <p>v.</p> <p>JAMES N. HOGAN, in his capacity as Clerk of the County of Gloucester; HEATHER POOLE, in her capacity as Deputy County Clerk of the County of Gloucester; STEPHANIE SALVATORE, in her capacity as Gloucester County Superintendent of Elections; and GLOUCESTER COUNTY BOARD OF ELECTIONS,</p> <p>Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: GLOUCESTER COUNTY</p> <p>DOCKET NO.:</p> <p>CIVIL ACTION</p>
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**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS'
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PRELIMINARY STATEMENT

This case is brought to correct clear violations of election laws by the Defendant Gloucester County Clerk (“County Clerk”) and/or Defendant Deputy County Clerk (“Deputy County Clerk”) in an expedited manner, and to enjoin the Defendant County Clerk, Defendant Gloucester County Superintendent of Elections (“Superintendent of Elections”) and Defendant Gloucester County Board of Elections (“Board of Elections”) from proceeding to disseminate unlawful vote by mail (“VBM”) ballots or prepare additional unlawful ballots for in-person voting in the upcoming General Election until those violations are cured. In addition, Plaintiffs are requesting the Defendant County Clerk be ordered to re-design the General Election ballot in conformity with the statutory mandates and that the re-designed ballot be uploaded and utilized by the County Board of Elections for both early and election day voting machines and tabulators. Finally, due to the number of VBM ballots already mailed, approximately 32,000, that the Board of Elections and Superintendent of Elections be required to implement two (2) separate tabulation systems to count the unlawfully designed VBM ballots and the corrected re-designed VBM ballots.

New Jersey law requires County Clerks to conduct a drawing for ballot positions in accordance with specific statutory mandates. First, the Clerk must place the names of each official political party into a drawing to determine which party receives the first column on the General Election Ballot. Here, at the ballot position drawing conducted on August 11, 2025, Defendant County Clerk and Defendant Deputy County Clerk did in fact pull the names of the Republican Party candidates and declared them to be located on Column A of the General Election ballot with the Democratic candidates to be located on Column B. However, as evidenced by the General Election VBM, the Defendant County Clerk ignored the requirement to

create a ballot in column form as required by law and rather utilized an office-box style which separates the candidates from their respective party columns.

The Defendant County Clerk does not have discretion to ignore the clear statutory mandates for the design of the General Election ballot. While the drawing for ballot position was conducted correctly, the County Clerk chose to design the General Election Ballot incorrectly by placing candidates nominated by major political parties in boxes separated by elected office. There is no consistent ballot placement for candidates nominated by political parties, which makes it all the more difficult for voters to locate their preferred candidates and for candidates to associate with one another on the ballot.

Plaintiffs meet the standard to obtain injunctive relief to compel the County Clerk to correctly design the General Election Ballot consistent with the statutory requirements. There is no question that the County Clerk and/or Deputy County Clerk violated the law. Plaintiffs will suffer irreparable harm by not being placed on the General Election Ballot in the manner required by statute. Further, Plaintiffs have already devoted substantial resources and funds, in reliance on state law and Defendants' previous representations, to advocate that voters "vote Column A." Those resources cannot be recouped and voters cannot be re-educated. Thousands of voters will be confused by the unlawful ballot. The County Clerk had no legal basis to ignore the law.

While requiring the County Clerk to comply with the laws cannot be described as "harm," any resulting burden on his office is far outweighed by the prejudice to not only the Plaintiffs and their members and supporters, but also the voters of Gloucester County. This Court should intervene immediately to compel the County Clerk to comply with the law and redesign the ballot for any further VBM ballots and for all future Early Voting and Election Day

ballots. Voting machines and tabulators can readily be programmed to utilize the legal and re-designed ballot. This will ensure the General Election can proceed legally and not disenfranchise or confuse the Gloucester County voters.

STATEMENT OF FACTS

For purposes of brevity, Plaintiffs incorporate the facts set forth in the Verified Complaint, which are supported by the documents attached to the Certification filed herewith.

LEGAL ARGUMENT

I. PLAINTIFFS MEET THE STANDARD TO PRELIMINARILY ENJOIN THE COUNTY CLERK, SUPERINTENDENT OF ELECTIONS, AND BOARD OF ELECTIONS FROM PROCEEDING WITH EITHER FURTHER DISTRIBUTING ILLEGALLY DESIGNED VOTE BY MAIL BALLOTS OR PREPARING UNLAWFUL BALLOTS FOR IN-PERSON VOTING IN THE GENERAL ELECTION

In determining whether to enter an interlocutory injunction, the Court must find that the movant has demonstrated (1) a reasonable probability of success on the merits; (2) that a balancing of the equities and hardships favors injunctive relief; (3) that the irreparable injury to be suffered in the absence of injunctive relief is substantial and imminent; and (4) that the public interest will not be harmed. Waste Management of N.J., Inc. v. Union County Utilities Auth., 399 N.J. Super. 508, 519-520 (App. Div. 2008); Crowe v. De Gioia, 90 N.J. 126, 132-34 (1982). For the reasons set forth herein, Plaintiffs meet the standard to obtain injunctive relief. Plaintiffs will suffer substantial and irreparable harm absent judicial intervention. The factual and legal basis for the issuance of injunctive relief is well supported.

A. PLAINTIFFS HAVE DEMONSTRATED A LIKELIHOOD OF SUCCESS ON THE MERITS

“[T]o prevail on an application for temporary relief, a plaintiff must make a preliminary showing of a reasonable probability of ultimate success on the merits.” Crowe, 90 N.J. at 133.

“The time-honored approach in ascertaining whether a party has demonstrated a reasonable

likelihood of success requires a determination of whether the material facts are in dispute . . . and whether the applicable law is settled.” Waste Mgmt., 399 N.J. Super. at 528. A court must “examine whether plaintiff demonstrated that the material facts favored its position[.]” Id. Plaintiffs satisfy this prong by demonstrating that while the drawing for ballot position was done correctly, the resulting ballot was unlawfully designed.

i. The Drawing for Ballot Position was Conducted Legally

It is clear that the drawing for ballot position conducted on August 11, 2025 complied with New Jersey law, as the certified two political parties (Exhibit B) were drawn first for Column A and Column B placement. N.J.S.A. 19:14-12 provides specific, non-discretionary rules governing the drawing for position on the General Election ballot. First, the County Clerk must draw lots to determine the column position of “**political parties** which made nominations,” whereby “the name of the **party** first drawn shall occupy the first column at the left of the ballot, and the name of the **party** next drawn shall occupy the second column, and so forth.” Courts have ordered County Clerks who fail to follow this statutory process to redo the drawing for position on a General Election ballot. New Jersey Conservative Party, Inc. v. Farmer, 324 N.J. Super. 451 (App. Div. 1999) (reversing County Clerk’s decision to conduct drawing for ballot position that ignored political party ballot placement).

ii. Thereafter, the Defendants Illegally Designed the General Election Ballot

After the mandatory drawing was conducted and the ballot columns were assigned to each political party, the County Clerk then, without notice to anyone, disregarded the column assignments by printing a General Election Ballot that dispenses with the column organization required by statute. A General Election ballot is statutorily required to have dedicated columns designating the candidates nominated by each recognized political party that held Primary Elections, additional dedicated columns for independent candidates, and separate rows listing

each office to be filled by election that must be presented in a statutorily specified order. See N.J.S.A. 19:14-6 (requiring “each column” to include “the proper word or words to designate the column, to be known as ‘column designation’” with the “columns at the extreme left [listing] the name of each of the political parties which made nominations at the next preceding primary election[.]”); N.J.S.A. 19:14-8 (“In the columns of each of the political parties which made nominations [in the primary election] and in the personal choice column, there shall be printed the title of each office to be filled at such election” in a specified order); N.J.S.A. 19:14-10 (imposing similar ballot design requirement and order for independent candidates); Axtel v. Caputo, 85 N.J. Super. 80, 83 (App. Div. 1964) (“the Legislature, by N.J.S.A. 19:14-12, gave a clear direction as to what lines were to be used and made it *incumbent upon the county clerk to use the lines in the precise order in which they appeared*” (emphasis added)).

There is no discretion afforded to County Clerks in designing a General Election ballot. See Axtel, 85 N.J. Super. at 83 (recognizing that “the statutory duty of the county clerk is clear, and not discretionary” in ordering the county clerk to redesign a non-compliant General Election ballot); see also Perry v. Giuliano, 46 N.J. Super. 550, 556 (App. Div. 1957) (affirming county clerk’s statutorily-compliant design of a general election ballot from a challenge by independent candidates seeking to deviate from the statutory process); Millman v. Kelly, 171 N.J. Super. 589, 600 (Law Div. 1979) (ruling statutory requirements, including columns, for official general election ballots “are mandatory” and ordering “[t]he official ballot must be reprinted to correct all these errors”). Mandamus relief is “appropriate where the party seeks to compel a governmental agency to perform a duty [that] is ministerial and wholly free from doubt.” Twp. of Neptune v. N.J. Dep’t of Env’tl Prot., 425 N.J. Super. 422, 434 (App. Div. 2012) (cleaned up).

Instead of following the specific and mandatory statutory requirements for ballot design, the County Clerk designed a ballot in which the candidates for each office are printed in separate office blocks in random order. The County Clerk had no discretion to deviate from the statutorily mandated grid design for the General Election ballot. Axtel, 85 N.J. Super. at 83.

As a result, the voting public in Gloucester County has been presented with an inherently confusing and random ballot with candidates from the same political party randomly scattered about. There are no columns or rows on the ballot as required by law. This ballot design is inherently confusing to voters and violates Title 19's clear directive to print all candidates from a single party in the same column for purposes of party identification and party association, as well as to print candidates from the Democratic and Republican parties each together in the same column. See N.J.S.A. 19:14-6. The Defendants have flouted the Legislature's judgment and in the process made the ballot confusing. The confusion inherent in the unlawful ballot design is compounded by the Defendants' secretive efforts to mislead the public and spring a new ballot design at the last moment while Plaintiffs spend limited resources to educate thousands of voters to "vote Column A."¹

At the August 11th draw, neither the County Clerk nor Deputy County Clerk gave any indication that the ballot would be redesigned to mirror the Primary office-block ballot. There was no sample ballot present at the ballot draw. In addition, from the period of the draw until the VBM ballots were received there was no disclosure of the newly designed ballot. See Ex. C, Certification of Chairman Wingate. To the contrary, at the draw, Defendant County Clerk and

¹ The New Jersey Globe reports that a "ranking Democrat confirmed that the party believed their chances of holding the Assembly and County Commissioner seats improved with an office block ballot." *See* David Wildstein, *Gloucester uses office block ballots in general election*, New Jersey Globe, <https://newjerseyglobe.com/local/gloucester-uses-office-block-ballots-in-general-election/> (last visited Sept. 25, 2025)

Defendant Deputy County Clerk did in fact pull the names of the Republican Party candidates and declared them to be located on Column A of the General Election ballot with the Democratic candidates to be located on Column B. It is nonsensical to designate the Republican and Democratic parties to Column A and Column B at the August 11th draw only to ultimately design a ballot that has neither of those columns.

Plaintiffs have demonstrated that they will likely succeed on the merits.

B. BALANCING OF THE EQUITIES WEIGHS HEAVILY IN FAVOR OF THE PLAINTIFFS

“The final test in considering the granting of a preliminary injunction is the relative hardship to the parties in granting or denying relief.” Crowe, 90 N.J. at 134. “So long as there is some merit to the claim, a court may consider the extent to which the movant would be irreparably injured in the absence of pendente lite relief, and compare that potential harm to the relative hardship to be suffered by the opponent if an injunction preserving the status quo were to be entered.” Waste Mgmt., 399 N.J. Super. at 535.

The balancing of the equities clearly weighs in favor of the Plaintiffs. The County Clerk violated several statutes and Plaintiffs’ constitutional rights by designing the General Election Ballot as disseminated. The design of the ballot creates confusion for the voters and increases the chance of voters not making rational informed decisions. The fact that these outcomes were the result of violations of law weigh heavily in favor of granting relief to Plaintiffs. The fact that these violations will certainly result in a chaotic election if permitted to stand bolsters that conclusion.

Conversely, the Defendants face no burden if the County Clerk is simply ordered to comply with the law. The County Clerk is obligated to follow the law, and being compelled to do so certainly cannot be characterized as a burden. Given that in-person voting does not

commence until late October, any delay in the Board of Elections programming voting machines and tabulators will likely have little to no impact on the discharge of its duties. The New Jersey Supreme Court ordered the reprinting of all ballots statewide 34 days before the 2002 general election in order to accommodate the Democratic Party's late substitution of a candidate for U.S. Senate. New Jersey Democratic Party, Inc. v. Samson, 175 N.J. 178, 195-96 (2002) ("we find that there is sufficient time before the general election to place a new candidate's name on the ballot"). The 2025 General Election will be held 39 days from the date of this pleading and the reason for ordering re-design is for conformity with the law (rather than accommodation of one political party's political predicament).

In addition, Plaintiffs recognize the confusion that could occur if all 32,000 VBM ballots were required to be recalled and/or resent. Those unlawful ballots cannot be recalled and must be tabulated when returned. But going forward the Defendants can and must comply with the law. Accordingly, the Plaintiffs are requesting that all future VBM ballots comply with the law as well as all in-person ballots to be used in Early Voting and Election Day voting.

On balance, the equities heavily favor Plaintiffs.

C. IRREPARABLE INJURY HAS AND WILL CONTINUE TO BE INFLICTED UPON PLAINTIFFS UNLESS THE COURT ACTS

It is a "fundamental principle[]" that "a preliminary injunction should not issue except when necessary to prevent irreparable harm." Crowe, 90 N.J. at 132. The alleged irreparable injury must be both "substantial and imminent," Waste Mgmt., 399 N.J. Super. at 520, and it must be "real, not abstract or speculative," see Garden State Equality v. Dow, 216 N.J. 314, 320 (2013). The irreparable harm cannot be compensated adequately in damages. See Scherman v. Stern, 93 N.J. Eq. 626, 631 (E. & A. 1922). "[T]he relief granted should be no broader than necessary to preserve the *status quo* pending a plenary hearing on the merits." Crowe, 90 N.J. at

135. A court will usually issue an injunction “to prevent an anticipated or threatened injury, either to protect against a repetition of unlawful conduct or to guard against reasonably apprehended misconduct or infringement of a legal right.” Sheahan v. Upper Greenwood Lake Property Owners Ass’n, 36 N.J. Super. 133, 136 (App. Div. 1955) (quoting Hoffman-LaRoche, Inc. v. Weissband, 11 N.J. 541, 555 (1953)).

Plaintiffs and the thousands of voters represented by the Gloucester County Republican Party will be irreparably harmed unless the Court acts to compel the County Clerk to redesign the General Election ballot to correctly meet the legal requirements and reflect the results of the ballot drawing that occurred on August 11, 2025. The State has an important interest in avoiding “ballot confusion” and has the ability to enact non-discriminatory rules to achieve that goal. Democratic-Republican Organization of New Jersey v. Guadagno, 900 F. Supp. 2d 447, 465 (D.N.J. 2012) (citing Norman v. Reed, 502 U.S. 279, 290 (1992)). Voters in Gloucester County will undoubtedly be confused, and are confused, as the VBM ballot has been printed and delivered in a format when no prior General Election ballot has been designed in this manner. See, Exhibit C, Affidavit of Chairman Wingate. A vote lost to another candidate due to confusion or unlawful ballot design causes irreparable injury to Plaintiffs that can never be undone. A voter who decides to not return their VBM or stays home and not vote because they cannot understand the unintelligible ballot design for a General Election damages the Plaintiffs, all candidates on the ballot, and the residents of Gloucester County in a way that can never be repaired. If even one voter decides to stay home because they are confused about the process, the general public loses out due to reduced voter participation.

As the Supreme Court observed: “The purpose of a ballot is to permit voters to record their will, and one must assume the Legislature intended a ballot so arranged that all voters may

find their candidates with the least difficulty the total content of the ballot will permit.”

Richardson v. Caputo, 46 N.J. 3, 9 (1965). The Court continued: “Here we can find no reason, and no one suggests a reason, to deny plaintiffs the benefit of their joint candidacy or to deny a voter who wants to advance the party or the principles of the candidates an easy opportunity to find all of them.” Id. at 10.

In short, the Legislature’s decision to organize candidates by party columns represents the Legislature’s judgment that such ballot design best serves voters and reduces confusion in recording their will. This is precisely why the Legislature requires a simple, easily understood grid ballot design for General Elections.

Further, Plaintiffs have devoted substantial resources and funds, in reliance on state law and Defendants’ previous representations, to advocate that voters “vote Column A.” Those resources cannot be recouped and voters cannot be re-educated. Thousands of voters will be confused by the unlawful ballot.

Finally, Defendants’ unlawful design of the ballot violates the constitutional rights of Plaintiffs as a party, as candidates, and as voters. Violations of constitutional rights, especially in the abridgment of voting rights, necessarily constitute irreparable harm.

These harms cannot be redressed with money. They can be remedied only by an immediate injunction requiring the Defendants to comply with the law.

Time is of the essence since approximately 32,000 VBM ballots were mailed out on or about September 20, 2025. With applications for VBM being accepted by the Board of Elections and Superintendent of Elections until October 28, 2025, applications for VBM ballots received on and after the date of the Court’s order should be held with the VBM being mailed out only after the ballot has been redesigned to meet all of the legal requirements. Furthermore, the

statutory deadline to mail sample ballots is by October 22, 2025. N.J.S.A. 19:14-25. Considering that at least some lead time is required to re-design, print and mail the new VBM ballots and General Election Sample Ballots, and to update the voting machines, it is imperative that this matter be addressed immediately.

D. A PRELIMINARY INJUNCTION PROTECTS AND PROMOTES THE PUBLIC INTEREST

“[T]he propriety of an interlocutory injunction has to be viewed . . . from the vantage point of the public.” Waste Mgmt., 399 N.J. Super. at 536. “[I]n the exercise of their equitable powers,” courts “may, and frequently do, go much farther both to give and withhold relief in furtherance of the public interest than they are accustomed to go when only private interests are involved.” Id. at 520-21 (internal quotation omitted).

The voting public in Gloucester County is entitled to receive the same type of easily understood, statutorily compliant General Election ballot that the County Clerk designed in the past. The County Clerk has no legitimate interest in abruptly changing the design of the ballot as he has here; and certainly no interest that outweighs that of the public in having the opportunity to cast their ballot unimpeded by an off-the-cuff and unlawful change in design. Withholding relief here would only serve to damage the public interest, confuse voters, and pave the way for further litigation.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court enter judgment in their favor, enjoin the County Clerk and Board of Elections from proceeding in the election process and to require the Clerk to redesign the General Election ballot in accordance with the law. Upon completion of the redesigned ballot, all newly requested VBM voters shall receive the

legally correct ballot and all voting machines and tabulators, either for early voting or election day voting, shall be updated with the proper ballot.

Dated: September 26, 2025

Respectfully submitted,

**HOLSTON, MacDONALD, UZDAVINIS,
MYLES & DeMARCANTONIO**

By: /s/ Marla M. DeMarcantonio
Marla M. DeMarcantonio, Esq.

DHILLON LAW GROUP INC.

By: /s/ Josiah Contarino
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<p>JONATHAN M. SAMMONS, BYRON DRISCOLL and GLOUCESTER COUNTY REPUBLICAN COMMITTEE,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>JAMES N. HOGAN, in his capacity as Clerk of the County of Gloucester; HEATHER POOLE, in her capacity as Deputy County Clerk of the County of Gloucester; STEPHANIE SALVATORE, in her capacity as Gloucester County Superintendent of Elections; and GLOUCESTER COUNTY BOARD OF ELECTIONS,</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: GLOUCESTER COUNTY</p> <p>DOCKET NO.:</p> <p style="text-align: center;">CIVIL ACTION</p> <p style="text-align: center;">CERTIFICATION OF COUNSEL</p>
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I, MARLA M. DeMARCANTONIO, of full age, hereby certify as follows:

1. I am an attorney-at-law of the State of New Jersey and am a Partner at the law
offices of Holston, MacDonald, Uzdevinis, Myles & DeMarcantonio. I am counsel for the

Plaintiffs and am familiar with the facts set forth herein, which are based upon matters of public record.

2. Attached hereto as **Exhibit A** is a true and accurate copy of the document entitled “2025 General Election Candidates” obtained from the County Clerk’s website at <https://www.gloucestercountynj.gov/DocumentCenter/View/16336/2025-OFFICIAL-General-Election-Candidate-List?bidId=>

3. Attached hereto as **Exhibit B** is a true and accurate copy of the document entitled “Certificate of Political Parties” obtained from the Department of State’s website at: <https://www.nj.gov/state/elections/assets/pdf/election-results/other/2023-certificate-of-political-parties.pdf>

4. Attached hereto as **Exhibit C** is a true and accurate copy of an Affidavit of GCGOP Chairman J. Adam Wingate dated September 25, 2025.

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

**HOLSTON, MacDONALD, UZDAVINIS,
MYLES & DeMARCANTONIO**
A Professional Corporation
Attorney for Plaintiffs

By: /s/ Marla M. DeMarcantonio
Marla M. DeMarcantonio

Dated: September 26, 2025

EXHIBIT A

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OUNCIL	BARNSHAW	KEN	DEMOCRATIC	DEPTFORD	430 FRANKIN AVE, DEPTFORD NJ 08096	JOHNVINC1234@GMAIL.COM
OUNCIL UNEXPIRED	MCDONOUGH	MARTIN	REPUBLICAN	DEPTFORD	1283 TANYARD RD, SEWELL NJ 08080	DJSOFEE@DEPTFORNOIGOP.ORG
OUNCIL UNEXPIRED	NOCE	JIM	DEMOCRATIC	DEPTFORD	504 MULLENBERG AVE, WENONAH NJ 08090	JOHNVINC1234@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION	ROSSER	LINDA S.	DEPTFORD EDUCATION ADVOCATES	DEPTFORD - BOE	758 GLENSIDE DR, MANTUA NJ 08051	SUSANZUL48@HOTMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION	GRAY	STACY L.	DEPTFORD EDUCATION ADVOCATES	DEPTFORD - BOE	211 SICKLE LN, DEPTFORD NJ 08096	STACYNJOHN@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION	DAVIS	JULIAH	DEPTFORD EDUCATION ADVOCATES	DEPTFORD - BOE	2175 COOPER ST, DEPTFORD NJ 08096	JULIAHADAVIS@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION	BERGLUND	WALTER "BUTCH"	LOWER SCHOOL TAXES	DEPTFORD - BOE	885 BANKBRIDGE RD, SEWELL NJ 08080	BUTCHBERG@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION	LOTOCKI	SHARNEE	SCHOOL BOARD MEMBER	DEPTFORD - BOE	120 TREELINE DR, DEPTFORD NJ 08096	SNYDER_SIV@YAHOO.COM
MEMBERSHIP TO BOARD OF EDUCATION	BANNING	JOSEPH	LEADERSHIP THAT LISTENS	DEPTFORD - BOE	3 JONES AVE, DEPTFORD NJ 08096	JBANNING@BANNINGFORDEPTFORD.ORG
MEMBERSHIP TO BOARD OF EDUCATION	SPENCER, SR.	THOMAS E.	NO SLOGAN	DEPTFORD - BOE	118 BURNING TREE RD, DEPTFORD NJ 08096	SPENCERT416@COMCAST.NET
OUNSHIP COMMITTEE	PHILBIN, JR.	JAMES	REPUBLICAN	EAST GREENWICH	210 HOPKINS RD, MICKLETON NJ 08056	jphilbin210@gmail.com
OUNSHIP COMMITTEE	HOLLINGSHEAD	EILEEN	REPUBLICAN	EAST GREENWICH	348 KINGS HWY, CLARKSBORO NJ 08020	belakids4@comcast.net
OUNSHIP COMMITTEE	NO NOMINATION MADE		DEMOCRATIC	EAST GREENWICH		
MEMBERSHIP TO BOARD OF EDUCATION	BLAICK	CRISTIN JAVORSKY	NO SLOGAN	EAST GREENWICH - BOE	208 BRYSONS WAY, MT ROYAL NJ 08061	CRISTIN.BLAICK@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION	NO PETITION FILED			EAST GREENWICH - BOE		
MEMBERSHIP TO BOARD OF EDUCATION	NO PETITION FILED			EAST GREENWICH - BOE		
MEMBERSHIP TO BOARD OF EDUCATION	BOERLIN	LAUREN A.	COMMITTED TO EXCELLENCE	EAST GREENWICH - KINGSWAY REGIONAL BOE	404 MEGAN DR, MICKLETON NJ 08056	BOERLINS@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION	COMERFORD	CHRISTIE CALLAHAN	NO SLOGAN	EAST GREENWICH - KINGSWAY REGIONAL BOE	310 W CROSSING DR, MT ROYAL NJ 08061	CHRISTIE@COMERFORDJAW.COM
OUNSHIP COMMITTEE	LUCAS	NATE	REPUBLICAN	ELK	462 ELK RD, MONROEVILLE NJ 08343	NLUCA@ELKTOWNSHIPNJ.GOV
OUNSHIP COMMITTEE	BEY	DARLEMA	DEMOCRATIC	ELK	507 ARCH ST, GLASSBORO NJ 08028	DARLEMABEY@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION	RUCZYNSKI	SARAH	NO SLOGAN	ELK - BOE	813 ELK RD, MONROEVILLE NJ 08343	SRUCZYNSKI8@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION	PETERSON	LYNNETTE	NO SLOGAN	ELK - BOE	23 COWEY PL, MONROEVILLE NJ 08343	LYNNETTE.PETERSON@YAHOO.COM
MEMBERSHIP TO BOARD OF EDUCATION	THOMAS	EUGENE	NO SLOGAN	ELK - BOE	134 CARL AVE, MONROEVILLE NJ 08343	BLGRISH18@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION	PICCIRILLO	DAVID J.	NO SLOGAN	ELK - DELSEA REGIONAL BOE	127 RAILROAD AVE, MONROEVILLE NJ 08343	PICCIRIDJ@GMAIL.COM
OUNSHIP COMMITTEE	MARSH, JR.	MICHAEL	REPUBLICAN	FRANKLIN	50 STEPHANIE DR, FRANKLINVILLE NJ 08322	
OUNSHIP COMMITTEE	KEEN	JONATHAN	REPUBLICAN	FRANKLIN	2313 SHERIDAN AVE, FRANKLINVILLE NJ 08322	
OUNSHIP COMMITTEE	VENTONIQUE	PHIL	DEMOCRATIC	FRANKLIN	164 ASHLEY DR, FRANKLINVILLE NJ 08322	
OUNSHIP COMMITTEE	NO NOMINATION MADE		DEMOCRATIC	FRANKLIN		
MEMBERSHIP TO BOARD OF EDUCATION	LLOYD	BENJAMIN	NO SLOGAN	FRANKLIN - BOE	553 CLARK AVE, FRANKLINVILLE NJ 08322	BENLLOYD1689@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION	FRAGOSO	ALICIA	YOUR VOICE COUNTS	FRANKLIN - BOE	290 MARIA CT, NEWFIELD NJ 08344	GRAVENORA@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION	VAN KOY	SAMANTHA	NO SLOGAN	FRANKLIN - BOE	1876 STANTON AVE, FRANKLINVILLE NJ 08322	SAMVANKOY@GMAIL.COM

MEMBERSHIP TO BOARD OF EDUCATION	BRANDT	JASON	CONSERVATIVE VALUES	FRANKLIN - BOE	688 ROSEMONT AVE, NEWFIELD NJ 08344	BRANDTCONS12@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	CIANCAGLINI	BARBARA	NO SLOGAN	FRANKLIN - BOE	489 FRANKLIN ST, FRANKLINVILLE NJ 08322	BLSC1952@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	DIMATTEO	WILLIAM	NO SLOGAN	FRANKLIN - BOE	306 LEONARD CAKE RD, FRANKLINVILLE NJ 08322	BDIMATTEO2@yahoo.com
MEMBERSHIP TO BOARD OF EDUCATION	GAGLIANONE	ELLEN J.	INTEGRITY DEDICATED PASSIONATE	FRANKLIN - DELSEA REGIONAL BOE	2050 MAIN RD, NEWFIELD NJ 08344	ELGAG@COMCAST.NET
OUNCIL	DUTCH	KRISTEN	REPUBLICAN	GLASSBORO	46 ARLOTTA ST, GLASSBORO NJ 08028	KDUITCH107@ICLOUD.COM
OUNCIL	CLINE	RUSSELL	REPUBLICAN	GLASSBORO	46 ARLOTTA ST, GLASSBORO NJ 08028	RUSSELLCLINE81@yahoo.com
OUNCIL	COSABONE, SR.	GEORGE P.	DEMOCRATIC	GLASSBORO	116 WEATHERBY LN, GLASSBORO NJ 08028	
OUNCIL	BRIDA SPENCE	DANIELE	DEMOCRATIC	GLASSBORO	1211 GLEN RIDGE DR, GLASSBORO NJ 08028	123DBR@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION	RICCI	MICHELE	NO SLOGAN	GLASSBORO - BOE	15 WARE DR, GLASSBORO NJ 08028	MISHY1269@aol.com
MEMBERSHIP TO BOARD OF EDUCATION	KUDLESS	STEPHEN	FOR THE KIDS	GLASSBORO - BOE	134 SIENNA LN, GLASSBORO NJ 08028	KUDLESS1976@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	ESGRO	CHRISTOPHER M.	NO SLOGAN	GLASSBORO - BOE	435 PEACE LN, GLASSBORO NJ 08028	CHRIS17218@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	ALCEA	NEVAEH	NO SLOGAN	GLASSBORO - BOE	5203 CRESCENT CT, GLASSBORO NJ 08028	NEVAEH.ALCEA@OUTLOOK.COM
MEMBERSHIP TO BOARD OF EDUCATION	SMITH	NADIA	NO SLOGAN	GLASSBORO - BOE	125 HIGGINS DR, GLASSBORO NJ 08028	NADIA78.NS@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	SAVICKY	ANDREW	MAKE EDUCATION GREAT	GLASSBORO - BOE	312 PRINCETON RD S, GLASSBORO NJ 08028	COASAVY@gmail.com
OUNCIL	ZAMPAGLIONE	CARMEN	REPUBLICAN	GREENWICH	601 PIETA PL, GIBBSTOWN NJ 08027	
OUNCIL	NO NOMINATION MADE	ANTONIO	REPUBLICAN	GREENWICH	764 DUNCAN AVE, GIBBSTOWN NJ 08027	
OUNCIL	CHILA	LANI	DEMOCRATIC	GREENWICH	506 W BROAD ST, GIBBSTOWN NJ 08027	
OUNCIL	COLE	MICHAEL	OUR KIDS FIRST	GREENWICH - BOE	149 CENTER ST, GIBBSTOWN NJ 08027	THE.HASENPAT5@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION	HASENPAT	ERICA	OUR KIDS FIRST	GREENWICH - BOE	350 TOMLIN STATION RD, GIBBSTOWN NJ 08027	CONTACT@ERICACOSGROVE.COM
MEMBERSHIP TO BOARD OF EDUCATION	FRITZ	VANESSA	OUR KIDS FIRST	GREENWICH - BOE	27 N REPAUNO AVE, GIBBSTOWN NJ 08027	VANESSAROSE.FRITZ@gmail.com
OUNSHIP COMMITTEE	POWELL	MICHELLE	REPUBLICAN	HARRISON	1 WOODDUCK DR, MULICA HILL NJ 08062	MPowell@BESTVERSIONMEDIA.COM
OUNSHIP COMMITTEE	JACOUS	JEFFREY	DEMOCRATIC	HARRISON	171 HIGH ST, MULICA HILL NJ 08062	
OUNSHIP COMMITTEE	BROWN	MATTHEW	DEMOCRATIC	HARRISON	1304 DAWN CT, MULICA HILL NJ 08062	MATTHEWBROWN1278@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION	NO NOMINATION MADE		ACHIEVING MORE	HARRISON - BOE	412 HAWCOCK DR, MULICA HILL NJ 08062	WALTBRIGHT24@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION	BOVEN	JENNIFER A.	TOGETHER	HARRISON - BOE	23 EAGLE DR, MULICA HILL NJ 08062	WALTBRIGHT24@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION	BAST	TIM	TOGETHER	HARRISON - BOE	9 HUNTERS CREEK CIRCLE, MULICA HILL NJ 08062	WALTBRIGHT24@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION	BRIGHT	WALTER	ACHIEVING MORE	HARRISON - BOE	120 KAREN CT, MULICA HILL NJ 08062	JERS@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION	SCHWAB	JOSEPH	NO SLOGAN	HARRISON - BOE	112 WHITE OWL TRAIL, MULICA HILL NJ 08062	JWILLIAMS0973@VERIZON.NET
MEMBERSHIP TO BOARD OF EDUCATION	WILLIAMS	JOHN	NO SLOGAN	HARRISON - BOE		
OUNCIL	NO NOMINATION MADE		REPUBLICAN	LOGAN		
OUNCIL	NO NOMINATION MADE		REPUBLICAN	LOGAN		
OUNCIL	SMITH, JR.	ARTHUR	DEMOCRATIC	LOGAN	155 APPLEWOOD DR, LOGAN TWP NJ 08085	ARTWSMITH@ME.COM
OUNCIL	LAWRY	SHEEMA	DEMOCRATIC	LOGAN	10 REISING PL, LOGAN TWP NJ 08085	SHEEMA.LAWR@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION	RUSSELL	JOHN	NO SLOGAN	LOGAN - BOE	119 SHIRE LN, SWEDSBORO NJ 08085	KAPPAJR@LIVE.COM

MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	TONER, JR.	NO SLOGAN	LOGAN - BOE	213 ABBEY LN, LOGAN TOWNSHIP NJ 08085	BLONER@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	NO PETITION FILED		LOGAN - BOE		
OWNSHIP COMMITTEE	GOSCHLER	KRISTIN	REPUBLICAN	MANTUA	MANTUAREPUBLICAN@GMAIL.COM
OWNSHIP COMMITTEE	SEPEY	SEAN	REPUBLICAN	MANTUA	MANTUAREPUBLICAN@GMAIL.COM
OWNSHIP COMMITTEE	LUKENS	EILEEN	DEMOCRATIC	MANTUA	67 CANDLEWOOD DR, MANTUA NJ 08051
OWNSHIP COMMITTEE	STEEN	JACK	DEMOCRATIC	MANTUA	9 KRISTEN LN, MANTUA NJ 08051
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	ATKINSON	ERICA I.	INDOCTRINATION	MANTUA - BOE	STANGOLDLAWAYS@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	VICK	KAREN	NO SLOGAN	MANTUA - BOE	KVICK@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	CARVALHO	SHAWNQUEUA	COMMUNITY COMMITMENT	MANTUA - BOE	GREGG-AMV@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	GREGG	AMV	COMMUNITY COMMITMENT	MANTUA - BOE	GREGG-AMV@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	MCGOUGH, JR.	MICHAEL C.	BUILDING BRIGHTER FUTURES	MANTUA - BOE	MCMCGOUGHJR@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	QUENZEL	BRYAN	CLEARVIEW STUDENTS FIRST	MANTUA - BOE	QUENZELSERVICE@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	BUCKMAN	JENNIFER	NO SLOGAN	MANTUA - BOE	JENBUCKMAN05@GMAIL.COM
MEMBERSHIP TO BOARD OF FIRE COMMISSIONERS	HOWARTH	KEVIN	NO SLOGAN	MANTUA - FIRE COMMISSIONER	BAITERBOV660@YAHO.COM
MEMBERSHIP TO BOARD OF FIRE COMMISSIONERS	NEELY	JIM	NO SLOGAN	MANTUA - FIRE COMMISSIONER	22-4@LIVE.COM
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	MAGEE	JAMES P.	UNITED FOR KIDS	MONROE - BOE	TONYBRAVES@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	MOHR	ROSEMARIE	UNITED FOR KIDS	MONROE - BOE	TONYBRAVES@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	LANTIEIGNE	ANTHONY J.	UNITED FOR KIDS	MONROE - BOE	TONYBRAVES@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	WILSON	JEANINE	MONROE KIDS FIRST	MONROE - BOE	MKOZACHYN@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	MILLER-DOBBINS	JAYVE	MONROE KIDS FIRST	MONROE - BOE	MKOZACHYN@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	BUNDI	ANTHONY	MONROE KIDS FIRST	MONROE - BOE	MKOZACHYN@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION INEPIRED TERM TWO (2) YEARS	LEWIS	AL	UNITED FOR KIDS	MONROE - BOE	ALLEWISSR@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION INEPIRED TERM TWO (2) YEARS	KOZACHYN	MARK	MONROE KIDS FIRST	MONROE - BOE	MKOZACHYN@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION INEPIRED TERM ONE (1) YEAR	SHERIDAN	MARIE	MONROE KIDS FIRST	MONROE - BOE	MKOZACHYN@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION INEPIRED TERM ONE (1) YEAR	BRANDO	VINCENT	UNITED FOR KIDS	MONROE - BOE	TONYBRAVES@GMAIL.COM
OUNCIL	NO NOMINATION MADE		NATIONAL PARK		
OUNCIL	HART	AIMEE	DEMOCRATIC	NATIONAL PARK	HART.AIMEE@OUTLOOK.COM
OUNCIL UNEPIRED	MACDONALD	JULIE	REPUBLICAN	NATIONAL PARK	JULIE.MACDONALD@TD.COM
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	FLEMING	JESSICA	NO SLOGAN	NATIONAL PARK - BOE	JESSIC@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION ULL TERM THREE (3) YEARS	FARLEY	AMV	NO SLOGAN	NATIONAL PARK - BOE	AMURTB@UGH@GMAIL.COM

MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	DICKSON	JULIE	NO SLOGAN	SWEDSBORO - WOOLWICH - BOE	67 MARATHON DR, SWEDSBORO NJ 08085	jdickson@aol.com
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	NO PETITION FILED			SWEDSBORO - WOOLWICH - BOE		
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	NO PETITION FILED			SWEDSBORO - WOOLWICH - BOE		
OUNCIL UNEXPIRED	PASQUALONE	DANA	REPUBLICAN	WASHINGTON	6 GREENLOCH CT, SEWELL NJ 08080	DPASQUA1@COMCAST.NET
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	LAURIA	DENNIS J.	DEMOCRATIC	WASHINGTON	184 DORADO AVE, SEWELL NJ 08080	DENNIS.LAURIA@YAHOO.COM
UL TERM THREE (3) YEARS	LINDSAY	SEAN	NO SLOGAN	WASHINGTON - BOE	365 CHAPEL HEIGHTS RD, SEWELL NJ 08080	SLEAHAN@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	MASOTTI	JAMES	NO SLOGAN	WASHINGTON - BOE	253 CHAMPION WAY, SEWELL NJ 08080	JAMES.MASOTTI@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	BAKER	CONNIE	IMPROVE OUR SCHOOLS	WASHINGTON - BOE	52 COUNTRY CLUB RD, TURNERSVILLE NJ 08012	CONNIE_BAKER@VERIZON.NET
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	MARANO	ANGELO	NO SLOGAN	WASHINGTON - BOE	51 BRYANT RD, TURNERSVILLE NJ 08012	AMARANO@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	SCHECHEER	TERRI	NO SLOGAN	WASHINGTON - BOE	68 HARTFORD RD, SEWELL NJ 08080	TERRIWA.SHSCHECHEER@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	WILLIAMS	BRANDY	NO SLOGAN	WASHINGTON - BOE	17 LONG BOW DR, SEWELL NJ 08080	BRANDYMPARRA@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	KOZEMPEL	JULIE	ACADEMIC SUCCESS PERIOD	WASHINGTON - BOE	10 SCHNEIDER CT, SEWELL NJ 08080	JULIEKOZZZ@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	SMITH	BEN	IT'S ABOUT YOU	WASHINGTON - BOE	8 ANNETTE CT, SEWELL NJ 08080	BSMITHNO1A49@GMAIL.COM
MEMBERSHIP TO BOARD OF FIRE COMMISSIONERS UL TERM THREE (3) YEARS	MOORE	GERARD	NO SLOGAN	WASHINGTON - FIRE COMMISSIONER	3 NANCY LN, TURNERSVILLE NJ 08012	GERARDMOORE@MFC.COM
MEMBERSHIP TO BOARD OF FIRE COMMISSIONERS UL TERM THREE (3) YEARS	DONOFRIO	TONY	NO SLOGAN	WASHINGTON - FIRE COMMISSIONER	314 FISH POND RD, GLASSBORO NJ 08028	TONYSAUTO@VERIZON.NET
MEMBERSHIP TO BOARD OF FIRE COMMISSIONERS UL TERM THREE (3) YEARS	BUSH	CHRISTOPHER "CHRIS"	NO SLOGAN	WASHINGTON - FIRE COMMISSIONER	21 LAKESIDE LN, SEWELL NJ 08080	CHRIS@CBUSH.COM
MEMBERSHIP TO BOARD OF FIRE COMMISSIONERS UL TERM THREE (3) YEARS	PARKER	MICHAEL	NO SLOGAN	WASHINGTON - FIRE COMMISSIONER	17 WASHINGTON AVE, TURNERSVILLE NJ 08012	FMPPARKER10@GMAIL.COM
MEMBERSHIP TO BOARD OF FIRE COMMISSIONERS UL TERM THREE (3) YEARS	ETISCHMAN, III	EDWIN L.	NO SLOGAN	WASHINGTON - FIRE COMMISSIONER	405 GREENVIEW DR, TURNERSVILLE NJ 08012	ETISCHMAN51@COMCAST.NET
OUNCIL	NO NOMINATION MADE		REPUBLICAN	WENONAH		
OUNCIL	GRAVES	JACLYN	DEMOCRATIC	WENONAH	207 E BLUTTONWOOD ST, WENONAH NJ 08090	jgraves@boroughofwenonah.com
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	GRIGRI	JEANNE MAX	DEMOCRATIC	WENONAH	12 LENAPE TRL, WENONAH NJ 08090	jgrigr@boroughofwenonah.com
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	HORN	JULIA	NO SLOGAN	WENONAH - BOE	101 N PRINCETON AVE, WENONAH NJ 08090	JULIAHORN1353@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	DEMO MORRIS	CHERYL	NO SLOGAN	WENONAH - BOE	5 S JACKSON AVE, WENONAH NJ 08090	MRR845@AOL.COM
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	MADGEY	SARAANN	NO SLOGAN	WENONAH - BOE	104 S PRINCETON AVE, WENONAH NJ 08090	SARAAMADGEY@GMAIL.COM
MEMBERSHIP TO BOARD OF EDUCATION UL TERM THREE (3) YEARS	PATRICK	CHRISTINE	NO SLOGAN	WENONAH - GATEWAY REGIONAL BOE	204 S CLINTON AVE, WENONAH NJ 08090	CHRISTINEBPATRICK@GMAIL.COM
OWNSHIP COMMITTEE	NO NOMINATION MADE		REPUBLICAN	WEST DEPTFORD		
OWNSHIP COMMITTEE	ROBINSON	JAMES	DEMOCRATIC	WEST DEPTFORD	1404 ST MATTHEWS DR, WESTVILLE NJ 08093	WESTDEPTFORDDEM51@GMAIL.COM
OWNSHIP COMMITTEE	SCHULTZ	KIMBERLY	DEMOCRATIC	WEST DEPTFORD	7 GARRICK SQ, MANTUA NJ 08051	WESTDEPTFORDDEM51@GMAIL.COM

MEMBERSHIP TO BOARD OF EDUCATION	OWENS	JOSEPH PATRICK	FOR OUR KIDS	WEST DEPTFORD - BOE	1150 OULETTON RD, WEST DEPTFORD NJ 08066	JPOMEDIA1@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	BARNA	NANCY	KEEPING STUDENTS FIRST	WEST DEPTFORD - BOE	1422 WOODLANE DR, WEST DEPTFORD NJ 08093	NANCYBARNA1031@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	BOUCHER	BRIAN	REAL READY RELATABLE	WEST DEPTFORD - BOE	1316 ROYAL LN, WEST DEPTFORD NJ 08086	BEANREADYRELATABLE@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	CHRISTY	MICHELE	REAL READY RELATABLE	WEST DEPTFORD - BOE	48 PELHAM DR, WEST DEPTFORD NJ 08051	REALREADYRELATABLE@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	JONES-DAMMINGER	SAMANTHA	REAL READY RELATABLE	WEST DEPTFORD - BOE	1339 VERGA AVE, WEST DEPTFORD NJ 08093	BEANREADYRELATABLE@gmail.com
OUNCIL	NO NOMINATION MADE		REPUBLICAN	WESTVILLE		
OUNCIL	NO NOMINATION MADE	TRAVIS	REPUBLICAN	WESTVILLE	50 BURR AVE, WESTVILLE NJ 08093	TLAWRENCE@WESTVILLE-NJ.COM
OUNCIL	LAWRENCE	TRACY	DEMOCRATIC	WESTVILLE	136 SYNDER AVE, WESTVILLE NJ 08093	TYANACKER@WESTVILLE-NJ.COM
OUNCIL UNEXPIRED	NO NOMINATION MADE		REPUBLICAN	WESTVILLE		
OUNCIL UNEXPIRED	MCCULLOUGH	MANDI	DEMOCRATIC	WESTVILLE	133 HUNTER AVE, WESTVILLE NJ 08093	MCCULLOUGH@WESTVILLE-NJ.COM
MEMBERSHIP TO BOARD OF EDUCATION	HERRMANN	MICHAEL	NO SLOGAN	WESTVILLE - BOE	105 E OLIVE ST, WESTVILLE NJ 08093	MHERRMANN28@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	NO PETITION FILED			WESTVILLE - BOE		
MEMBERSHIP TO BOARD OF EDUCATION	NO PETITION FILED			WESTVILLE - BOE		
MEMBERSHIP TO BOARD OF EDUCATION	NO PETITION FILED			WESTVILLE - BOE		
MEMBERSHIP TO BOARD OF FIRE COMMISSIONERS	BOBIAK, SR.	JOSEPH K.	NO SLOGAN	WESTVILLE - FIRE COMMISSIONER	52 BURR AVE, WESTVILLE NJ 08093	JOESONS@COMCAST.NET
OUNCIL	FACCHINE, JR	RODNEY J.	REPUBLICAN	WOODBURY HEIGHTS	404 CENTRAL AVE, WOODBURY HEIGHTS NJ 08097	
OUNCIL	MCGINLEY	MICHAEL K.	REPUBLICAN	WOODBURY HEIGHTS	447 OAK AVE, WOODBURY HEIGHTS NJ 08097	
OUNCIL	FARRELL	BRUCE	DEMOCRATIC	WOODBURY HEIGHTS	440 SPRUCE CT, WOODBURY HEIGHTS NJ 08097	
OUNCIL	SMITH	NICHOLAS	DEMOCRATIC	WOODBURY HEIGHTS	383 LINCOLN AVE, WOODBURY HEIGHTS NJ 08097	NICKSMITHKK@aol.com
MEMBERSHIP TO BOARD OF EDUCATION	ELDAKKAH	KATERINA	NO SLOGAN	WOODBURY HEIGHTS - BOE	726 SECOND ST, WOODBURY HEIGHTS NJ 08097	KELEDAKKAH17@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	HENRY	DAVID	NO SLOGAN	WOODBURY HEIGHTS - BOE	116 ALLIANCE ST, WOODBURY HEIGHTS NJ 08097	DKRH92@yahoo.com
MEMBERSHIP TO BOARD OF EDUCATION	ROBINSON	STEFANIE	NO SLOGAN	WOODBURY HEIGHTS - BOE	941 WALNUT AVE, WOODBURY HEIGHTS NJ 08097	ROBINSONSTEFANIE@yahoo.com
MEMBERSHIP TO BOARD OF EDUCATION	IVERSEN RATTLE	JEANETTE	NO SLOGAN	WOODBURY HEIGHTS - GATEWAY REGIONAL BOE	423 LINDEN AVE, WOODBURY HEIGHTS NJ 08097	JEANETTRAT@gmail.com
OUNCIL	NO NOMINATION MADE		REPUBLICAN	WOODBURY WARD 1		
OUNCIL	CARTER	DANIELLE	DEMOCRATIC	WOODBURY WARD 1	636 WASHINGTON AVE, WOODBURY NJ 08096	DANCAR1975@icloud.com
OUNCIL	NO NOMINATION MADE		REPUBLICAN	WOODBURY WARD 2		
OUNCIL	HARMON-GARLIC	NORLYN	DEMOCRATIC	WOODBURY WARD 2	75 ABERDEEN PL, WOODBURY NJ 08096	ADRIAND8096@yahoo.com
OUNCIL	NO NOMINATION MADE		REPUBLICAN	WOODBURY WARD 3		
OUNCIL	JOHNSON	ROB	DEMOCRATIC	WOODBURY WARD 3	349 HIGH ST, WOODBURY NJ 08096	RSJOHNSON82@yahoo.com
MEMBERSHIP TO BOARD OF EDUCATION	POLANCO	IVELISSA	EDUCATORS FOR EDUCATION	WOODBURY - BOE	44 CURTIS AVE, WOODBURY NJ 08096	IVE.POLANCO@gmail.com
MEMBERSHIP TO BOARD OF EDUCATION	PEGUES	JOSEPH C.	EDUCATORS FOR EDUCATION	WOODBURY - BOE	128 S JACKSON ST, WOODBURY NJ 08096	JOSEPHPEGUES128@comcast.net
MEMBERSHIP TO BOARD OF EDUCATION	MCILVANE	ELIZABETH	NO SLOGAN	WOODBURY - BOE	23 HESS AVE, WOODBURY NJ 08096	GIMACSWIFE@gmail.com
OUNSHIP COMMITTEE	RUSHTON	ROBERT	REPUBLICAN	WOOLWICH	20 BELFLORE DR, WOOLWICH NJ 08085	QNEIGUY@COMCAST.NET
OUNSHIP COMMITTEE UNEXPIRED	NOCENTINO	MICHAEL	DEMOCRATIC	WOOLWICH	91 BUCKEYE RD, WOOLWICH NJ 08085	MINOCENTINO@gmail.com
OUNSHIP COMMITTEE UNEXPIRED	RAKITIS	SHANNON	REPUBLICAN	WOOLWICH	329 KESWICK DR, WOOLWICH NJ 08085	SHANNONRAKITIS3@gmail.com
OUNSHIP COMMITTEE UNEXPIRED	WILLIAMS	JACQUELINE E.	DEMOCRATIC	WOOLWICH	115 PATRICIA DR, WOOLWICH NJ 08085	JWILLIAMS01@comcast.net

MEMBERSHIP TO BOARD OF EDUCATION									
ULL TERM THREE (3) YEARS	BAKER	NATALIE	NO SLOGAN	SWEDESBORO-WOOLWICH - BOE	137 JUNIPER LN, WOOLWICH NJ 08085		NBAKERBOE@GMAIL.COM		
MEMBERSHIP TO BOARD OF EDUCATION									
ULL TERM THREE (3) YEARS	DICKSON	JULIE	NO SLOGAN	SWEDESBORO-WOOLWICH - BOE	67 MARATHON DR, SWEDESBORO NJ 08085		JDICKSON@AOL.COM		
MEMBERSHIP TO BOARD OF EDUCATION									
ULL TERM THREE (3) YEARS	NO PETITION FILED			SWEDESBORO-WOOLWICH - BOE					
MEMBERSHIP TO BOARD OF EDUCATION									
ULL TERM THREE (3) YEARS	NO PETITION FILED			SWEDESBORO-WOOLWICH - BOE					
MEMBERSHIP TO BOARD OF EDUCATION									
ULL TERM THREE (3) YEARS				WOOLWICH -					
MEMBERSHIP TO BOARD OF EDUCATION									
INEXPRED TERM ONE (1) YEAR	DOPKE	JACLYN S.	NO SLOGAN	KINGSWAY REGIONAL BOE	5 KARENS CT, WOOLWICH NJ 08085		JACLYN.DOPKE@GMAIL.COM		

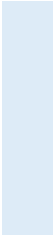


EXHIBIT B

State of New Jersey



Department of State

CERTIFICATE OF POLITICAL PARTIES

Trenton, New Jersey

I, Tahesha Way, Lt. Governor/Secretary of State, DO HEREBY CERTIFY that, pursuant to N.J.S.A. 19:12-1, to qualify for political party recognition, a designated group must receive ten per centum (10%) of the total votes cast in the State for Members of the General Assembly; and that at the General Election of November 7, 2023, a total of 3,304,578 votes were cast for such office, of which 330,457 votes represent 10% of that total; and

IT IS FURTHER CERTIFIED that those candidates with the designation "Democratic" received 1,804,047 votes, thereby the Democratic Party is recognized as a political party pursuant to N.J.S.A. 19:12-1; and

IT IS FURTHER CERTIFIED that those candidates with the designation "Republican" received 1,485,075 votes, thereby the Republican Party is recognized as a political party pursuant to N.J.S.A. 19:12-1; and

IT IS FURTHER CERTIFIED that no other political group met the 10% requirement to be recognized as a political party pursuant to N.J.S.A. 19:12-1.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the Official State Seal in Trenton, this Eleventh day of December 2023.


Tahesha Way
Lt. Governor/Secretary of State

EXHIBIT C

**HOLSTON, MacDONALD, UZDAVINIS
MYLES & DeMARCANTONIO**

MARLA M. DeMARCANTONIO, ESQUIRE - NJ Bar ID 010572009

66 Euclid Street

Woodbury, New Jersey 08096

(856) 848-5858

mdemarca@holstonlaw.com

DHILLON LAW GROUP INC.

JOSIAH CONTARINO, ESQUIRE - NJ Bar ID 003962013

50 Park Place, Suite 1105

Newark, NJ 07102

(917) 423-7221

jcontarino@dhillonlaw.com

*Attorney for Plaintiffs Jonathan M. Sammons, Byron Driscoll and the Gloucester County
Republican Committee*

<p>JONATHAN M. SAMMONS, BYRON DRISCOLL and GLOUCESTER COUNTY REPUBLICAN COMMITTEE,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>JAMES N. HOGAN, in his capacity as Clerk of the County of Gloucester; HEATHER POOLE, in her capacity as Deputy County Clerk of the County of Gloucester; STEPHANIE SALVATORE, in her capacity as Gloucester County Superintendent of Elections; and GLOUCESTER COUNTY BOARD OF ELECTIONS,</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: GLOUCESTER COUNTY</p> <p>DOCKET NO.: GLO- L -</p> <p>CIVIL ACTION</p> <p>Affidavit of J. Adam Wingate, Chairman of GCGOP</p>
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I, J. Adam Wingate, of full age, hereby swear under oath:

1. As of June 17, 2024, I am the duly elected Chairman of the Gloucester County
Republican Party ("GCGOP").
2. On March 12, 2025, I along with GCGOP Vice Chair, Marla DeMarcantonio, met

with Gloucester County Clerk James Hogan and County Deputy Clerk Heather Poole at the Board of Elections to review the new forms for endorsement of a slogan since the Primary Ballot would not have a “county line”.

3. At this meeting, Clerk Hogan explained that due to litigation and subsequent state laws adopted, the primary ballots would be office block format; however, the general election would remain traditional column ballots.
4. On March 27, 2025, I again along with Ms. DeMarcantonio met with County Clerk Hogan and Deputy County Clerk Poole to review the petitions with the GCGOP endorsements.
5. Mr. Hogan specifically indicated that unless he was ordered to use the primary-style office block ballot he would continue to use the column ballot style for the General Election.
6. On August 11, 2025, I attended the drawing of ballot positions for the general election candidate by the Clerk Hogan at the Gloucester County Justice Complex.
7. At the drawing of ballot positions there were no sample ballots on display.
8. Due to the County Clerk having a shoulder injury, Deputy County Clerk Poole was responsible for shaking the container with the party names on them prior to being pulled.
9. Clerk Hogan still read the names with the first name being called Republicans for Column A.
10. The Democrats were announced as Column B for the General Election ballot.
11. At no point in time during the drawing was there any mention of the ballot being changed or altered to the primary-style office block ballot.

12. The GCGOP then planned election literature material noting the Governor, Assembly, County Commissioner and local candidates would be located on Column A.
13. On Monday, September 22, 2025 I was sent a picture of a Vote by Mail Ballot showing the ballot not in the traditional column format but rather in the primary box-style.
14. At no point from the date of the drawing on August 11, 2025 through today did the Clerk's office ever inform me of the ballot change.
15. In addition, there has been no educational information disseminated either via mail, on the County Clerk's website or on the County Clerk's Facebook page explaining the new design of the General Election ballot.
16. To the best of my knowledge approximately 32,000 Vote By Mail ("VBM") ballots have been mailed to the residents of Gloucester County.
17. I personally have had vote by mail voters contact me with questions regarding the ballots and wanting to confirm this was in fact a legitimate vote by mail ballot, since they had never seen one formatted this way.

Under penalty of perjury, I hereby declare and affirm that the above-mentioned statements are true and correct, to the best of my knowledge.

Date:

9/26/25

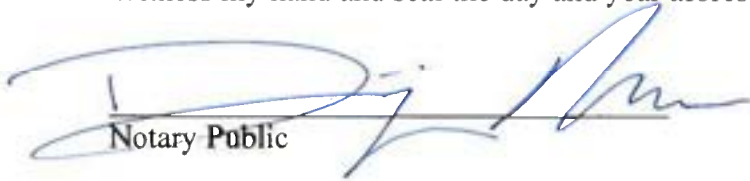


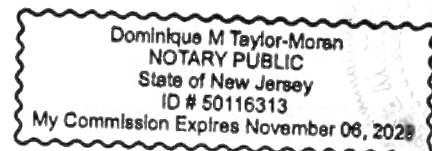
J. Adam Wingate

STATE OF NEW JERSEY :
:SS.
COUNTY OF GLOUCESTER :

On this 26th day of September, 2025, before me, the undersigned authority, personally appeared ADAM WINGATE who upon oath and affirmation of belief and personal knowledge that the matters, facts and things set forth are true and correct to the best of his knowledge.

Witness my hand and seal the day and year aforesaid.


Notary Public



My Commission Expires: November, 6 2029

Civil Case Information Statement

Case Details: GLOUCESTER | Civil Part Docket# L-001286-25

Case Caption: DRISCOLL BYRON VS HOGAN JAMES

Case Initiation Date: 09/26/2025

Attorney Name: JOSIAH A CONTARINO

Firm Name: DHILLON LAW GROUP, INC.

Address: 50 PARK PL STE 1105

NEWARK NJ 07102

Phone: 9174237221

Name of Party: PLAINTIFF : Driscoll, Byron

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: OTHER Election Law - Enjoin Unlawfully Designed Ballots

Document Type: Verified Complaint

Jury Demand: NONE

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Byron Driscoll? NO

Are sexual abuse claims alleged by: Jonathan Sammons? NO

Are sexual abuse claims alleged by: Gloucester Cnty Repub Commt? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

09/26/2025

Dated

/s/ JOSIAH A CONTARINO

Signed