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Tommy                      Pamela                      Robert  
**RUSSO RICHMOND & WALSH**  
**CANDIDATES FOR HOWELL TOWNSHIP COUNCIL**

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June 10, 2018

The Honorable Christine Giordano Hanlon, Esq.  
County Clerk  
County of Monmouth  
Election Offices  
33 Mechanic Street  
Freehold, NJ 07728

Re:     **Challenge to Petition for Office**  
          **Howell Township Council, Michael Bernstein**

Dear Clerk Hanlon:

We are writing to you in order to challenge the legitimacy of the petition of Independent Candidate Michael Bernstein for Howell Township Council. Based on a review of the petition in question, it appears that Mr. Bernstein did not secure a sufficient number of signatures pursuant to State Statute. Furthermore, there are several other irregularities that call to question Mr. Bernstein's candidacy. We therefore request that your office invalidate said petition. In support of our findings, please note the following:

- Several residents that signed Mr. Bernstein's petition also signed petitions for other Howell Township candidates running as Democrats. Pursuant to NJSA 19:13-4, this is a prohibited activity;
- John Bonevich, a Democratic candidate for Howell Council signed Mr. Bernstein's petition. Further, and more disturbing, the Howell Democratic Chairman John McCabe also signed Mr. Bernstein's petition. Mr. McCabe in particular was one of several residents who signed multiple petitions in violation of the cross-over statute. In the case of Messrs. Bovevich and McCabe, we now question the outright legitimacy of Mr. Bernstein's candidacy as an Independent and whether he is really aligned with the Democrats.

The cross-over violations are in clear violation of the law. What is equally as disturbing is that the Howell Democratic Municipal Chair and one of their candidates appears to be supporting their own slate of candidates and that of an Independent. This calls to question whether there is collusion among the Democrats and Mr. Bernstein, an alleged Independent.

State statutes with respect to cross-over are clear and based on our review of Mr. Bernstein's petition, it is obvious his petition can not be certified. Furthermore, based on our review of other irregularities, we respectfully request that your office take the necessary actions to protect the legitimacy of the Howell Township municipal election.

Attached is a list of those signatures we have found to be invalid.

Please contact us with the appropriate next steps.

Respectfully,

Thomas Russo  
732-546-5475

Pam Richmond  
201-401-9638

Bobby Walsh  
732-857-0502

Copy: Mr. Shawn Golden, Chairman, Monmouth County Republican Committee  
Mr. Juan Malave, Chairman, Howell Township

## LIST OF QUESTIONABLE SIGNATURES

- Bonevich, John
- Doyle, Mary Ann
- Harvey, Ellen
- Iwanyk, Janis
- Labuza, Loreen
- MacFie, Valerie
- McCabe, John
- Murphy, Robert
- O'Donnell, Larissa
- Osborne, Joan
- Parisi, Marc
- Pytko, Janet
- Pytko, Katherine