

PERCIPIENT STRATEGIES RESEARCH DOSSIER

LUANNE PETERPAUL

(NEW JERSEY GENERAL ASSEMBLY: LD-11)

Last Updated: August 11, 2023

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EXECUTIVE SYNOPSIS

DOSSIER NOTES

In preparing this background report, we undertook an examination of all readily available and relevant electronic and online records, several hundred Nexis and news articles, dozens of active and archived web pages, and several dozen public records from Nexis and the resources of various federal, state, and municipal government offices. The results of our analysis are contained below.

Typographical Note: There are a number of articles quoted in this report that contain typographical errors. These are from the original text of the article and have not been corrected when being quoted directly.

NOTABLE NARRATIVES

Questionable Attorney Record

An analysis of Luanne Peterpaul's record as an attorney has revealed numerous instances of questionable clients she has chosen to represent, ranging from severe criminal charges, to charges of discrimination and other employment charges, to fighting against unions.

Early in her career, Peterpaul appears to have worked as a criminal defense attorney. Peterpaul represented clients charged with serious offenses like bank fraud, intimidating witnesses, and firearm-related crimes. Others may raise questions about her serious on gun control issues given she routinely received reduced sentences through plea agreements. Additionally, Peterpaul has represented individuals and corporations who faced legal action over allegations of discrimination, harassment, and other employment-related issues. Specifically, Peterpaul regularly represented corporations against allegations they discrimination against employees on the basis of race and gender, withheld pay, and had employees who were sexually harassed. Interestingly, Peterpaul boasts about her experience as a labor relations attorney, despite the fact that she has frequently served as counsel for corporations. To that effect, Peterpaul has worked as an attorney for corporations who fought against unions on issues related to pensions and collective bargaining agreements. Ironically, Peterpaul is quoted saying she "built her career taking on tough fights and standing up against bullies," yet, in most lawsuits, Peterpaul appears to have been legal counsel for the corporations and "bullies." Likewise, despite her past work fighting against unions, Peterpaul has received thousands of dollars from unions thus far for her campaign.

Personal Foibles

Luanne Peterpaul boasts several vulnerabilities which others may seek to capitalize. Peterpaul has been accused negligence in her capacity as a board member of an apartment complex and while operating a vehicle. In June 2020, a negligence complaint was filed against Peterpaul and other members of the board of trustees of the Village of Red Inn Condominiums, alleging the units had "been plagued with severe and pervasive water infiltration, damage, and mold, resulting from the defective conditions in the common areas." The plaintiff additionally claimed

that the board of trustees has “been aware of the problems...for years yet the trustees have failed to carry out their basic duties.” In December 2022, the parties agreed to settle and the case was dismissed. Likewise, Peterpaul’s auto negligence is currently ongoing. Despite her own negligent behavior, Peterpaul has also filed at least one lawsuit against another person in which she claimed she was injured on their property due to negligence. The parties in this case settled and the case was dismissed. It should also be noted that at least one civil judgment has been entered against Peterpaul for nearly \$1,000.

TOP HITS

Legal

Attorney Record (Criminal Lawsuits)

- Early in her career, Peterpaul appears to have worked as a criminal defense attorney.
 - Peterpaul represented clients charged with serious offenses like bank fraud, intimidating witnesses, and firearm-related crimes.
 - Others may raise questions about her serious on gun control issues given she routinely received reduced sentences through plea agreements.

Attorney Record (Employment-Related Lawsuits)

- Peterpaul has represented individuals and corporations who faced legal action over allegations of discrimination, harassment, and other employment-related issues.
 - Peterpaul regularly represented corporations against allegations they discrimination against employees on the basis of race and gender, withheld pay, and had employees who were sexually harassed.
 - Peterpaul boasts about her experience as a labor relations attorney, despite the fact that she has frequently served as counsel for corporations.

Attorney Record (Union Lawsuits)

- Peterpaul has worked as an attorney for corporations who fought against unions on issues related to pensions and collective bargaining agreements.
 - Ironically, Peterpaul is quoted saying she “built her career taking on tough fights and standing up against bullies,” yet, in most lawsuits, Peterpaul appears to have been legal counsel for the corporations and “bullies.”
 - Despite her past work fighting against unions, Peterpaul has received thousands of dollars from unions thus far for her campaign.

Negligence Lawsuits

- In June 2020, a negligence complaint was filed against Peterpaul and other members of the board of trustees of the Village of Red Inn Condominiums, alleging the units had “been plagued with severe and pervasive water infiltration, damage, and mold, resulting from the defective conditions in the common areas.”
 - The plaintiff additionally claimed that the board of trustees has “been aware of the problems...for years yet the trustees have failed to carry out their basic duties.”
 - In December 2022, the parties agreed to settle and the case was dismissed.

- In March 2021, an auto negligence complaint was filed against Peterpaul after she caused an accident.
 - This case is currently ongoing.
- Peterpaul has also filed at least one lawsuit against another person in which she claimed she was injured on their property due to negligence.
 - The parties in this case settled and the case was dismissed.

Financial

Civil Judgment

- In June 2002, a civil judgment of \$920 was entered against Peterpaul and her former law firm.

Political

Voting History

- Since 2002, Peterpaul has failed to vote in at least 11 primary elections, all of which were primaries.

Liberal Ties And Partisan Activity

- On social media, Peterpaul has indicated support for several prominent liberal figures.
 - On social media, Peterpaul has promoted content indicating support for Elizabeth Warren.
 - On social media, Peterpaul has promoted content indicating support for Hillary Clinton.
 - On social media, Peterpaul has promoted content indicating support for Joe Biden.
 - On social media, Peterpaul has promoted content indicating support for Phil Murphy.
- On social media, Peterpaul has promoted partisan content unbecoming of a public official.
 - In 2016, Peterpaul ‘liked’ a post that criticized Donald Trump for his comments toward woman.
 - In 2016, Peterpaul ‘liked’ a tweet that claimed Donald Trump was a misogynist and racist.
 - In 2016, Peterpaul ‘liked’ a tweet that claimed Trump is using meth or coke or both.

- In 2016, Peterpaul ‘liked’ a tweet that called Vice President Pence “a mess of deplorables”.
- In 2016, Peterpaul ‘liked’ a tweet that claimed Vice President Pence hates women.
- On social media, Peterpaul has promoted content that could be considered inappropriate for a public official.
 - In 2020, Peterpaul ‘liked’ a tweet that claimed there was pubic hair on Justice Thomas’ bible.
 - In 2020, Peterpaul ‘liked’ a tweet that uses vulgar language directed at Lindsey Graham; “bitch”.
 - In 2020, Peterpaul ‘liked’ a tweet that used the word fuck.

Policy

Labor

- Peterpaul is backed by local unions – including the New Jersey Education Association.
- Peterpaul appears to support increasing wage mandates (minimum wage).
 - In 2023, Peterpaul’s joint candidate campaign profile called for a \$15 an hour minimum wage.
 - In 2018, Peterpaul ‘liked’ a tweet that called for \$15/hour minimum.

Energy, Regulations

- Peterpaul has indicated support for anti-growth energy policies.
 - In 2023, Peterpaul’s joint candidate campaign profile called to codify 100% clean energy by 2035”.
 - In 2020, Peterpaul ‘liked’ a tweet that supported “climate change education across our k-12 learning standards”.

Traditional Social Issues

- Peterpaul appears unapologetically pro-abortion.
 - In 2023, Peterpaul held a rally criticizing the supreme court’s Dobbs decision.
 - In 2023, Peterpaul’s joint candidate campaign profile posted photos that called for an end to abortion bans.
 - In 2023, Peterpaul’s joint candidate campaign profile posted that they are hosting an event with Planned Parenthood Action Fund of New Jersey.

- In 2023, Peterpaul’s joint candidate campaign profile posted that the repeal of Roe v. Wade stripped freedoms from women all over the country.
- In 2023, Peterpaul’s joint candidate campaign profile posted that it is “crucial to maintaining the right to choose”.
- On social media, Peterpaul has promoted content that seeks to undermine the second amendment.
 - In 2018, Peterpaul ‘retweeted’ a post that praised companies that do not support the NRA.
 - In 2018, Peterpaul ‘liked’ a tweet that had a picture of the March 4 Our Lives.

LGBTQ Activism

- Peterpaul is a staunch LGBTQ activist.
 - Peterpaul was a co-author of new jersey's anti-bullying bill of rights; “she received the lifetime achievement award from the LGBTQ rights section of the new jersey state bar association”.
 - On social media, Peterpaul has promoted her support for ‘pride’ events.
- Peterpaul is the former board chair of the pro-LGBTQ organization known as Garden State Equality.
 - In 2023, Garden State Equality, an organization Peterpaul used to lead as board chair, endorsed her candidacy.
 - In 2017, while leading Garden State Equality, Peterpaul organized a rally opposing the Trump Administration’s transgender troop ban.
 - In 2014, while leading Garden State Equality, Peterpaul led the organization in hiring transgender activist Andy Bowen as the organization’s executive director.

Race

- On social media, Peterpaul has promoted divisive racial content and has indicated support for Black Lives Matter.
 - In 2020, Peterpaul tweeted “say her name Breonna Taylor”.
 - In 2020, Peterpaul ‘liked’ a tweet that supported the Black Lives Matter movement.

BACKGROUND INFORMATION

PERSONAL INFORMATION: LUANNE PETERPAUL

Full Name: Luanne M. Peterpaul

DOB: August 15, 1956 (66)

Social Security: 157-52-XXXX

Home Address: 15 Rivergate Way
Long Branch, NJ 07740
Monmouth County
(2005-Pres.)

Marital Status: Married

Spouse: Robin J. Kampf
DOB: June 1, 1957 (66)

Children: N/A



Voter Registration: Registered Democrat – Monmouth County, New Jersey

Education: 1980 – 1983 J.D., Seton Hall University
1974 – 1980 Duquesne University

Employment: 2016 – Pres. Partner, Peterpaul Law, LLP
2013 – Pres. Of Counsel, Peterpaul & Clark, PC
2019 – 2022 Judge, Long Branch Municipal Court
2013 – 2016 Partner, Gluck Walrath, LLP
1990 – 2013 Partner, Peterpaul & Clark, PC
1987 – 1990 Associate, Michael Critchley & Associates
1983 – 1987 Assistant Prosecutor, Essex County Prosecutor’s Office

Associations: Board Member, Unterberg Children’s Hospital Advisory Board
Board Member, Thomas Peterpaul Foundation
Former Chair, Garden State Equality

Military Service: N/A

Election Results: N/A

Web Sites: <https://www.team1pac.com/>

<https://victoryfund.org/>
<https://peterpaullaw.com/>
<https://ballotpedia.org/>
<https://www.njld11.com/>

Social Media: [Twitter](#) (Personal)
[LinkedIn](#) (Personal)

Email: L.PETERPAUL@PCCLAW.COM

Phone: (201) 755-9633

ELECTION RESULTS

NOTE: Luanne Peterpaul has never run for elected public office.

CAMPAIGN FINANCE

Thus far for Luanne Peterpaul has received an aggregate of \$65,300.11 in total contributions for his campaign for the New Jersey General Assembly for District 11. Peterpaul has received thousands dollars from labor groups in the state such as the NJ State Laborers. Peterpaul has also received thousands of dollars from the liberal education group the NJEA along with tens of thousands from fellow Democratic candidates across the state. Peterpaul has disbursed an aggregate of \$93,468.43 to date; however, nearly all of it was transferring funds to her general election fund.

Individually, Peterpaul has contributed an aggregate of \$8,112.50 to federal and statewide campaign committees. Federally, Peterpaul has contributed \$5,612.50 giving to various Democrats from the state of New Jersey including Bob Menendez. Peterpaul also contributed to Hillary Clinton's presidential campaign in 2016 and has also given to L PAC, the PAC supporting LGBTQ women. At the state level, Peterpaul has contributed \$2,500 to campaign committees in the state of New Jersey, giving to various Democrats across the state as well as the inaugural committees for several governors including Chris Christie and Phil Murphy.

Luanne Peterpaul For New Jersey (2023)

Notable Contributions

Thus Far, Peterpaul Has Received An Aggregate Of \$65,300.11 In Total Contributions For Her Campaign For The New Jersey General. (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)

- **In 2023, Peterpaul Received \$8,200 From EFO Craig Coughlin.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 2023, Peterpaul Received \$8,200 From The NJ State Laborers' PAC.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 2023, Peterpaul Received \$8,200 From Scutari Rfor Senate.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 2023, Peterpaul Received \$6,750 From Self-Declared Attorneys.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 2023, Peterpaul Received \$5,000 From Gopal For Senate.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 2023, Peterpaul Received \$4,000 From NJEA PAC.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)

Notable Expenditures

Thus Far, Peterpaul Has Disbursed An Aggregate Of \$93,468.43 For Her Campaign For The New Jersey General. (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)

- **In 2023, Peterpaul Transferred \$90,352.33 To Her General Election Fund.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)

Individual Contributions

Federal Election Commission

According To The Federal Election Commission, Peterpaul Has Contributed An Aggregate Of \$5,612.50 To Federal Campaign Committees. ([Federal Election Commission](#), Accessed 8/2/23)

- **Between 2016 And 2017, Peterpaul Contributed \$1,500 To L PAC.** ([Federal Election Commission](#), Accessed 8/2/23)
- **In 2000, Peterpaul Contributed \$1,000 To Connelly For Congress.** ([Federal Election Commission](#), Accessed 8/2/23)
- **Between 1996 And 2004, Peterpaul Contributed \$1,000 To The DNC.** ([Federal Election Commission](#), Accessed 8/2/23)
- **In 2016, Peterpaul Contributed \$685 To Hillary For America.** ([Federal Election Commission](#), Accessed 8/2/23)
- **In 1999, Peterpaul Contributed \$500 To Flanagan For US Senate.** ([Federal Election Commission](#), Accessed 8/2/23)
- **Between 2012 And 2018, Peterpaul Contributed \$327.50 To ActBlue.** ([Federal Election Commission](#), Accessed 8/2/23)
 - **In 2018, Peterpaul Earmarked \$200 To The New Jersey Democratic State Committee.** ([Federal Election Commission](#), Accessed 8/2/23)
 - **In 2012, Peterpaul Earmarked \$100 To Rice For Congress.** ([Federal Election Commission](#), Accessed 8/2/23)
 - **In 2012, Peterpaul Earmarked \$25 To The DCCC.** ([Federal Election Commission](#), Accessed 8/2/23)
 - **In 2012, Peterpaul Earmarked \$2.50 To ActBlue.** ([Federal Election Commission](#), Accessed 8/2/23)
- **In 2018, Peterpaul Contributed \$250 To Josh Welle For Congress.** ([Federal Election Commission](#), Accessed 8/2/23)
- **In 2011, Peterpaul Contributed \$250 To Menendez For Senate.** ([Federal Election Commission](#), Accessed 8/2/23)

New Jersey Election Law Enforcement Commission

According To The New Jersey Election Law Enforcement Commission, Peterpaul Contributed An Aggregate Of \$2,500 To Campaign Committees In The State Of New Jersey. (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)

- **In 2011, Peterpaul Contributed \$500 To Mary Pat Angelini.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 1990, Peterpaul Contributed \$500 To Inaugural 90.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 2014, Peterpaul Contributed \$500 To Inaugural 2014 Inc.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 1997, Peterpaul Contributed \$300 To Christine Whitman.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 2013, Peterpaul Contributed \$225 To The Monmouth County Democratic Organization.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 2018, Peterpaul Contributed \$200 To Inaugural 2018 Inc.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 2011, Peterpaul Contributed \$200 To Jeffrey Gardner.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)
- **In 1989, Peterpaul Contributed \$100 To James Florio.** (New Jersey Election Law Enforcement Commission, Accessed 8/2/23)

VOTING RECORDS

Luanne Peterpaul has been an actively-registered Democratic Party voter in Monmouth County, New Jersey since October 7, 2002. Since 2002, Peterpaul has failed to vote in at least 11 primary elections, all of which were primaries.

Monmouth County, NJ

According To The Monmouth County Superintendent Of Elections, Peterpaul Has Been An Actively-Registered Democratic Party Voter In Monmouth County, New Jersey Since October 7, 2002. (Voter Profile Report: Luanne Peterpaul, Monmouth County Superintendent Of Elections, Filed 10/7/02, New Jersey Open Records Law Request, Filed 7/11/23)

Voter Information:

Voter Name: LUANNE M PETERPAUL
DOB: 08/15/1956
Voter ID: H2386452234
Legacy ID: 114363221

Residence Address:

County: Monmouth
Street Number: 51
Street Name: Rivergate Way
Address Line 2:
Municipality: Long Branch City
City: Long Branch
State: NJ
Zipcode: 077407879

Party Information:

Current Party: Democratic
Party Privilege Date: 06/22/2020

Miscellaneous:

Gender: Female
Registration Date: 10/07/2002
Registration Type: Mail In

Status Information:

Voting Privilege Date: 11/05/2002
Date Last Voted: 06/06/2023
Current Status: Active
Poll Worker Status:

Mailing Address:

Address:

Inactive Confirmation Address:

Address:

(Voter Profile Report: Luanne Peterpaul, Monmouth County Superintendent Of Elections, Filed 10/7/02, New Jersey Open Records Law Request, Filed 7/11/23)

Since 2002, Peterpaul Has Failed To Vote In At Least 11 Elections: The 2003, 2004, 2005, 2006, 2007, 2009, 2011, 2013, 2014, 2015, And 2021 Primary Elections. (Voter Profile Report: Luanne Peterpaul, Monmouth County Superintendent Of Elections, Filed 10/7/02, New Jersey Open Records Law Request, Filed 7/11/23)

Election Name	Election Date	Election Type	Election Code	Ballot Type	County Voted In	Municipality Voted In	Party Affiliation	Memo User Scanned	Date Scanned	Date Counted	Ballot Status
PRIMARY ELECTION	06/06/2023	Primary	STATE PE	Machine	Monmouth	Long Branch City	Democratic	mocorsmoor001	06/03/2023	06/03/2023	
GENERAL ELECTION	11/08/2022	General	STATE GE	Machine	Monmouth	Long Branch City		STUART SIEWERT	11/08/2022	11/08/2022	
PRIMARY ELECTION	06/07/2022	Primary	STATE PE	Machine	Monmouth	Long Branch City	Democratic	STUART SIEWERT	06/07/2022	06/07/2022	
MUNICIPAL ELECTION	05/10/2022	Municipal	M 2022	Machine	Monmouth	Long Branch City		STUART SIEWERT	05/08/2022	05/08/2022	
GENERAL ELECTION	11/02/2021	General	STATE GE	Machine	Monmouth	Long Branch City		STUART SIEWERT	10/31/2021	10/31/2021	
GENERAL ELECTION	11/03/2020	General	STATE GE	Mail In	Monmouth	Long Branch City	Democratic	moboejpome001	11/24/2020	11/24/2020	Accepted
PRIMARY ELECTION	07/07/2020	Primary	STATE PE	Provisional	Monmouth	Long Branch City	Democratic	mosoemshep001	07/15/2020	02/04/2021	Accepted
GENERAL ELECTION	11/05/2019	General	STATE GE 2019	Machine	Monmouth	Long Branch City		MNSJMAZU	11/14/2019	11/05/2019	
PRIMARY ELECTION	06/04/2019	Primary	STATE PE 2019	Machine	Monmouth	Long Branch City	Democratic	MNSKCALD	06/10/2019	06/04/2019	
GENERAL ELECTION	11/06/2018	General	STATE GE 2018	Machine	Monmouth	Long Branch City		MNSLFRED	11/27/2018	11/06/2018	
PRIMARY ELECTION	06/05/2018	Primary	STATE PE 2018	Machine	Monmouth	Long Branch City	Democratic	MNSRBISH	06/12/2018	06/05/2018	
MUNICIPAL ELECTIONS	05/08/2018	Municipal	M 2018	Machine	Monmouth	Long Branch City		MNSCMOUN	05/09/2018	05/08/2018	
GENERAL ELECTION	11/07/2017	General	STATE GE 2017	Machine	Monmouth	Long Branch City		MNSBCIUL	11/15/2017	11/07/2017	
PRIMARY ELECTION	06/06/2017	Primary	STATE PE 2017	Machine	Monmouth	Long Branch City	Democratic	MNSLGATE	06/16/2017	06/06/2017	
GENERAL ELECTION	11/08/2016	General	STATE GENERAL 2016	Machine	Monmouth	Long Branch City		MNSABERW	11/28/2016	11/08/2016	

PRIMARY ELECTION	06/07/2016	Primary	STATE PE 2016	Machine	Monmouth	Long Branch City	Democratic	MNSMWADR	06/24/2016	06/07/2016
GENERAL ELECTION	11/03/2015	General	STATE GE 2015	Machine	Monmouth	Long Branch City		MNSTFITZ	11/12/2015	11/03/2015
GENERAL ELECTION	11/04/2014	General	STATE GE 2014	Machine	Monmouth	Long Branch City		MNSMWADR	11/13/2014	11/04/2014
MUNICIPAL ELECTIONS	05/13/2014	Municipal	M	Machine	Monmouth	Long Branch City		MNSJMAZU	05/14/2014	05/13/2014
GENERAL ELECTION	11/05/2013	General	STATE GE 2013	Machine	Monmouth	Long Branch City		MNSKMATU	11/08/2013	11/05/2013
SPECIAL GENERAL ELECTION FOR US SENATE	10/16/2013	General	STATE SPECIAL GE 2013	Machine	Monmouth	Long Branch City		MNSBCIUL	10/19/2013	10/16/2013
GENERAL ELECTION	11/06/2012	General	GE 2012	Machine	Monmouth	Long Branch City		MNSMSHEP	11/20/2012	11/06/2012
PRIMARY ELECTION	06/05/2012	Primary	STATE PE 2012	Machine	Monmouth	Long Branch City	Democratic	MNSJHOFF	06/14/2012	06/05/2012
STATE GENERAL ELECTION	11/08/2011	General	STATE GE 110811	Machine	Monmouth	Long Branch City		MNSJHOFF	11/16/2011	11/08/2011
STATE GENERAL 2010	11/02/2010	General	STATE GE 110210	Machine	Monmouth	Long Branch City		MNSJHOFF	11/15/2010	11/02/2010
STATE PRIMARY 2010	06/08/2010	Primary	STATE PE 060810	Machine	Monmouth	Long Branch City	Democratic	MNSJHOFF	06/16/2010	06/08/2010
MUNICIPAL ELECTIONS	05/11/2010	Municipal	M	Machine	Monmouth	Long Branch City		MNSCMOUN	05/13/2010	05/11/2010
STATE-SCHOOL ELECTION	04/20/2010	Annual School	STATESCHOOL10	Machine	Monmouth	Long Branch City		MNSJHOFF	04/29/2010	04/20/2010
STATE GENERAL ELECTION	11/03/2009	General	STATE GE 110309	Machine	Monmouth	Long Branch City		MNSJHOFF	11/17/2009	11/03/2009
GENERAL ELECTION	11/04/2008	General	00004	Machine	Monmouth	Long Branch City		MNSJHOFF	11/26/2008	11/04/2008
STATE-PRIMARY ELECTION	06/03/2008	Primary	STATEPRIMARY	Machine			Democratic	MNSJHOFF	06/03/2008	06/03/2008
STATE-SCHOOL ELECTION	04/15/2008	Annual School	STATESCHOOL	Machine				MNSSHAIN	04/15/2008	04/15/2008
PRESIDENTIAL PRIMARY	02/05/2008	Primary	PRESIDENTIALPRIMARY	Machine			Democratic	MNSMWADR	02/05/2008	02/05/2008
STATE-GENERAL ELECTION	11/06/2007	General	STATE11062007	Machine				MNSPIGNA	11/06/2007	11/06/2007
GENERAL ELECTION	11/07/2006	General	00040	Machine				MNSABERW	08/03/2007	11/07/2006
LONG BRANCH CITY MUNICIPAL ELECTION	05/09/2006	Municipal	00014	Machine				MNSSHAIN	08/03/2007	05/09/2006
GENERAL ELECTION	11/08/2005	General	00040	Machine				CONV	01/01/2005	11/08/2005
GENERAL ELECTION	11/02/2004	General	00040	Machine				CONV	12/11/2001	11/02/2004
GENERAL ELECTION	11/04/2003	General	00040	Machine				CONV	12/11/2001	11/04/2003
GENERAL ELECTION	11/05/2002	General	00040	Machine				CONV	01/01/2002	11/05/2002

(Voter Profile Report: Luanne Peterpaul, Monmouth County Superintendent Of Elections, Filed 10/7/02, New Jersey Open Records Law Request, Filed 7/11/23)

PUBLIC COMPENSATION

Between 2019 and 2022, Luanne Peterpaul received an aggregate of \$192,612 while serving as the Long Branch Municipal Court Judge.

Long Branch Judge (2019-2022)

Between 2019 And 2022, Peterpaul Received An Aggregate Of \$192,612 While Serving As The Long Branch Municipal Court Judge. (Compensation, Long Branch Clerk, New Jersey Open Public Records Act Request, Filled 7/11/23)

Luanne Peterpaul was hired on 01/25/2019, at the salary of \$47,500.00. She received one salary increase; at her resignation her salary was \$48,806.00. She resigned effective 12/28/2022. She was not eligible for the pension, but she was enrolled in the alternative plan which is the DCRP. This is all the information I am able to supply for this OPRA.

(Compensation, Long Branch Clerk, New Jersey Open Public Records Act Request, Filled 7/11/23)

CRIMINAL RECORDS

Luanne Peterpaul has received three traffic citations and nine parking citations in the state of New Jersey.

Traffic And Parking Citations

Peterpaul Has Received Three Traffic Citations And Nine Parking Citations In The State Of New Jersey. (New Jersey Municipal Court Case Search, Accessed 8/2/23)

Court Name	Case Number	Offense	Offense Description	Offense Date	Court Date/ Pay by Date	Case Status	Warrant Status
MONTCLAIR TWP MUNICIPAL COURT	P15 122222	327-34	PARKING METER	03/06/2012	04/30/2012	Disposed	
WOODBIDGE MUNICIPAL COURT	SP4 824204	39:4-56	DELAYING TRAFFIC	04/13/2010	05/10/2010	Disposed	
ASBURY PARK MUNICIPAL COURT	P01 215121	7-11.2	OVERTIME METER PARKING	12/23/2021	02/04/2022	Disposed	
ASBURY PARK MUNICIPAL COURT	P03 190559	7-11.2	OVERTIME METER PARKING	09/01/2019	09/12/2019	Disposed	
ASBURY PARK MUNICIPAL COURT	P07 210400	39:4-138	PARKING PROHIBITED	05/27/2021	06/03/2021	Disposed	
ASBURY PARK MUNICIPAL COURT	P10 212859	7-11.2	OVERTIME METER PARKING	09/27/2021	11/04/2021	Disposed	
ASBURY PARK MUNICIPAL COURT	P12 190192	7-11.2	OVERTIME METER PARKING	02/19/2019	04/02/2019	Disposed	
DEAL BORO MUNICIPAL COURT	E13 482	39:3-76.2F	FAILURE TO WEAR SEAT EQUIPMENT- RESPONSIBILITY OF DRIVER	04/26/2013	05/10/2013	Disposed	
DEAL BORO MUNICIPAL COURT	E17 1552	39:4-97.3	USE OF HAND-HELD WIRELESS TELEPHONES	12/21/2017	01/03/2018	Disposed	
HOLMDEL TWP MUNICIPAL COURT	E11 229	19:9-1.2 .09	RDWY-SPEEDING (.09 INDICATES EXCEEDING BY 1-9 MPH)	07/28/2011	09/14/2011	Disposed	

Court Name	Case Number	Offense	Offense Description	Offense Date	Court Date/ Pay by Date	Case Status	Warrant Status
LONG BRANCH MUNICIPAL COURT	LBC 124462	325-3D	PARKING PROH DURING CERTAIN HRS/CERTAIN STREETS	03/09/2013	04/02/2013	Disposed	
RED BANK BORO MUNICIPAL COURT	E16 8535	8-2.9B	METER EXPIRED	07/21/2016	09/08/2016	Disposed	

(New Jersey Municipal Court Case Search, Accessed 8/2/23)

POLICE RECORDS

NOTE: No immediately actionable information relating to Luanne Peterpaul could be gleaned from municipal law enforcement records.

REAL PROPERTY RECORDS

15 Rivergate Way, Long Branch, NJ, Monmouth County

This is the primary residence owned by Luanne Peterpaul and her wife, Robin Kampf. This single-family residence comprises four bedrooms and four bathrooms and has a 2022 assessed value of \$899,900. Peterpaul and her wife have owned the property since January 2005.



([Monmouth County GIS](#), Accessed 7/31/23)

Property Information

Full Address:	15 Rivergate Way, Long Branch, NJ 07740
County:	Monmouth County
Parcel ID:	27-00489-0000-00012-03
Property Type:	Single-Family Residential
Owner:	PETERPAUL LUANNE M & KAMPF ROBIN J
Sale Date:	01/19/2005
Sale Price:	\$729,000
Year Built:	2004
Total Bedrooms:	4
Total Bathrooms:	4
Total Square Footage:	3,237
2022 Assessed Value:	\$899,900

([Monmouth County Assessor](#), Accessed 7/31/23)

Tax Information

In 2022, Peterpaul Paid \$12,947.25 In Total Municipal Property Taxes. ([Monmouth County Assessor](#), Accessed 7/31/23)

ASSESSOR'S OFFICE CITY OF LONG BRANCH 344 BROADWAY LONG BRANCH NJ 07740		PRESORTED FIRST-CLASS MAIL U.S. POSTAGE PAID FREEHOLD NJ PERMIT #1	
DISTRICT: CITY OF LONG BRANCH			
NOTICE OF PROPERTY TAX ASSESSMENT FOR 2023		DATE MAILED: 11/15/22	
THIS NOTICE IS REQUIRED UNDER N.J.S.A. 54:4-38.1		#008259	
BLOCK: 489	LOT: 12.03	QUAL:	
PROPERTY LOCATION: 15 RIVERGATE WAY		CLASS: 2	
LAND: 355,000	BUILDING: 544,900	TOTAL:	899,900
NET PROPERTY TAXES BILLED FOR 2022		2022 ASSESSMENT	
WERE: \$12,947.25	TOTAL:		722,100
THIS IS NOT A BILL. SEE OTHER SIDE FOR APPEAL INFORMATION.			
15 RIVERGATE WAY LONG BRANCH, NJ		07740	

([Monmouth County Assessor](#), Accessed 7/31/23)

BANKRUPTCIES, JUDGMENTS, & LIENS RECORDS

In June 2002, a civil judgment of \$920 was entered against Luanne Peterpaul and her former law firm.

Civil Judgments

According To Nexis, In June 2002, A Civil Judgment Of \$920 Was Entered Against Peterpaul And Her Former Law Firm. (Nexis, Accessed 8/3/23)

No.	Type	Status	Amount	Filing Date	Filing Number	Jurisdiction
1.	Civil Suit	See Details	\$920.00	06/19/2002	DC-008225-2002	New Jersey
Debtor 1						
Luanne M Peterpaul						
1 Cleveland Pl Springfield, NJ 07081-1507 1 Cleveland Pl Springfield, NJ 07081-1507 SSN: 157-52-XXXX Filing Status: Updates May Be Present Elsewhere In This Report; Check The Court For The Current Status						
Debtor 2						
Peterpaul Clark & Corcoran						
1 Cleveland Pl Springfield, NJ 07081-1507 1 Cleveland Pl Springfield, NJ 07081-1507 Filing Status: Updates May Be Present Elsewhere In This Report; Check The Court For The Current Status						
Creditor 1						
Gerald Zakim						
Filing 1						
Type: Civil Suit Agency: New Jersey Superior Court Law Division Special Civil Part Agency State: NJ Agency County: Union Number: DC-008225-2002						

(Nexis, Accessed 8/3/23)

LEGAL ISSUES

Both personally and in her professional capacity as an attorney, Luanne Peterpaul has involved in numerous legal issues of note.

Professionally, early in her career, Peterpaul appears to have worked as a criminal defense attorney. Peterpaul represented clients charged with serious offenses like bank fraud, intimidating witnesses, and firearm-related crimes. Others may raise questions about her serious on gun control issues given she routinely received reduced sentences through plea agreements. Additionally, Peterpaul has represented individuals and corporations who faced legal action over allegations of discrimination, harassment, and other employment-related issues. Specifically, Peterpaul regularly represented corporations against allegations they discrimination against employees on the basis of race and gender, withheld pay, and had employees who were sexually harassed. Interestingly, Peterpaul boasts about her experience as a labor relations attorney, despite the fact that she has frequently served as counsel for corporations. To that effect, Peterpaul has worked as an attorney for corporations who fought against unions on issues related to pensions and collective bargaining agreements. Ironically, Peterpaul is quoted saying she “built her career taking on tough fights and standing up against bullies,” yet, in most lawsuits, Peterpaul appears to have been legal counsel for the corporations and “bullies.” Likewise, despite her past work fighting against unions, Peterpaul has received thousands of dollars from unions thus far for her campaign.

Personally, Peterpaul has been accused negligence in her capacity as a board member of an apartment complex and while operating a vehicle. In June 2020, a negligence complaint was filed against Peterpaul and other members of the board of trustees of the Village of Red Inn Condominiums, alleging the units had “been plagued with severe and pervasive water infiltration, damage, and mold, resulting from the defective conditions in the common areas.” The plaintiff additionally claimed that the board of trustees has “been aware of the problems...for years yet the trustees have failed to carry out their basic duties.” In December 2022, the parties agreed to settle and the case was dismissed. Likewise, Peterpaul’s auto negligence is currently ongoing. Despite her own negligent behavior, Peterpaul has also filed at least one lawsuit against another person in which she claimed she was injured on their property due to negligence. The parties in this case settled and the case was dismissed.

Personal Lawsuits

Michael Curry V. Ellen Battaglini, Et Al.

In June 2020, Michael Curry Filed A Complaint Against Peterpaul And Other Members Of The Board Of Trustees Of The Village Of Red Inn Condominiums, Alleging The Units Had “Been Plagued With Severe And Pervasive Water Infiltration, Damage, And Mold, Resulting From The Defective Conditions In The Common Areas.” (Case No. 2072CV00219, *Michael Curry V. Ellen Battaglini, Et Al.*, Barnstable County Superior Court, Filed 6/5/20)

MICHAEL CURRY, on behalf of the	*
VILLAGE AT RED INN	*
CONDOMINIUM TRUST and individually,	*
<i>Plaintiff</i>	*
	*
v.	*
	*
ELLEN BATTAGLINI, LUANNE PETERPAUL	*
STEVE NAHA, DONALD MORTON AND	*
MARTIN STARK, TRUSTEES OF THE	*
VILLAGE AT RED INN	*
CONDOMINIUM TRUST	*
<i>Defendants</i>	*

VERIFIED COMPLAINT


A. INTRODUCTORY STATEMENT

The Plaintiff is a unit owner in the Village at Red Inn Condominium. The Plaintiff’s unit and other units have been plagued with severe and pervasive water infiltration, damage, and mold, resulting from defective conditions in the Common Areas of the condominium. The defendants, Board of Trustees, have been aware of problems with water infiltration for years even before Plaintiff’s purchase yet the Trustees have failed to carry out their basic duties. In addition, Plaintiff has made numerous requests for access to the books and records of the condominium, records to which the Plaintiff is entitled pursuant to G.L. Chapter 183A §10. Defendants have refused, failed and neglected to provide access to these records.

(Case No. 2072CV00219, *Michael Curry V. Ellen Battaglini, Et Al.*, Barnstable County Superior Court, Filed 6/5/20)

- **The Plaintiff Alleged That The Board Of Trustees Has “Been Aware Of The Problems...For Years Yet The Trustees Have Failed To Carry Out Their Basic Duties.”** (Case No. 2072CV00219, *Michael Curry V. Ellen Battaglini, Et Al.*, Barnstable County Superior Court, Filed 6/5/20)

In December 2022, The Parties Agreed To Settle And The Case Was Dismissed. (Case No. 2072CV00219, *Michael Curry V. Ellen Battaglini, Et Al.*, Barnstable County Superior Court, Filed 12/2/22)

<p>ORDER FOR ENTRY OF DISMISSAL NISI</p>	<p>DOCKET NUMBER 2072CV00219</p>	<p>Trial Court of Massachusetts The Superior Court </p>
<p>CASE NAME: Michael Curry, on behalf of the Village at Red Inn Condominium Trust, and individually vs. Ellen Battaglini et al</p>		<p>Scott W. Nickerson, Clerk of Court Barnstable County</p>
<p>TO:</p>		<p>COURT NAME & ADDRESS Barnstable County Superior Court 3195 Main Street Barnstable, MA 02630</p>

The above entitled action came on before the court, Hon. Thomas J Perrino, and there upon was reported settled by counsel of record.

It is **ORDERED** that an AGREEMENT FOR JUDGMENT or STIPULATION OF DISMISSAL, be filed in the Clerk's office by 12/02/2022.

If said Agreement or Stipulation is not filed by said date the Clerk is hereby directed to prepare, sign and enter Judgment dismissing the Complaint, and all other claims, without prejudice and without statutory costs.

(Case No. 2072CV00219, *Michael Curry V. Ellen Battaglini, Et Al.*, Barnstable County Superior Court, Filed 12/2/22)

Felicia Jones V. Luanne Peterpaul

In March 2021, Felicia Jones Filed An Auto Negligence Complaint Against Peterpaul In Monmouth County, New Jersey. (Case No. MON L 001000-21, *Felicia Jones V. Luanne Peterpaul*, Monmouth County Superior Court, Filed 3/22/21)

FELICIA JONES, <i>as Guardian ad Litem</i> for MARRIAH JONES, a minor, and FELICIA JONES, individually, <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> LUANNE M. PETERPAUL, <p style="text-align: center;">Defendants.</p>	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MONMOUTH COUNTY DOCKET NO. MON-L- <p style="text-align: center;"><u>Civil Action</u></p> <p style="text-align: center;">COMPLAINT AND DEMAND FOR TRIAL BY JURY AND VERBAL THRESHOLD CERTIFICATION</p>
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PLAINTIFFS, Felicia Jones, individually and as *Guardian ad Litem* for Marriah Jones, a minor, and residing at 828 Dunlewy Street, in the City of Asbury Park, County of Monmouth and State of New Jersey, by way of Complaint against Defendants herein, says:

FIRST COUNT

1. On or about September 1, 2019, and at all times pertinent hereto, Minor Plaintiff, Marriah Jones, was a passenger of a motor vehicle, which was lawfully and carefully proceeding southbound on Ocean Avenue, in the City of Long Branch, County of Monmouth, State of New Jersey.

2. At all times pertinent herein, Defendant, Luanna M. Peterpaul with an address of 15 Rivergate Way, in the City of Long Branch, County of Monmouth, and State of New Jersey, was the operator of a motor vehicle which was also traveling southbound on Ocean Avenue, in the City of Long Branch, County of Monmouth, State of New Jersey.

3. At all times pertinent hereto, Defendant, Luanne M. Peterpaul had a duty to operate her motor vehicle in a safe and prudent manner so as to avoid causing an unreasonable risk of injury to others.

4. On or about September 1, 2019, Defendant, Luanne M. Peterpaul, negligently and carelessly breached her duty as aforesaid in that she operated the motor vehicle in a negligent and careless manner, failed to maintain control of her vehicle, failed to make proper observations, failed to take evasive action, failed to keep a safe distance between her vehicle and the vehicle traveling in front of her, traveled at a speed in excess of that which was appropriate for the conditions then existing, and otherwise failed to exercise due care in the operation of her vehicle, all of which caused and/or contributed to the rear-end crash involving the motor vehicle which was operated by Plaintiff, Marriah Jones.

5. As a direct and proximate result of the negligence and carelessness of Defendant, Luanna M. Peterpaul as aforesaid, Plaintiff, Marriah Jones, sustained serious and permanent physical injuries and emotional grief, torment and anguish, have been and will in the future be prevented from engaging in her usual pursuits and activities, has been and will in the future be caused to expend great sums of money in an effort to seek a cure for her injuries, has been and will in the future be caused to sustain great economic loss, and has been and will in the future be caused to sustain a loss of enjoyment of life.

(Case No. MON L 001000-21, *Felicia Jones V. Luanne Peterpaul*, Monmouth County Superior Court, Filed 3/22/21)

- **This Case Is Currently Ongoing.** (Case No. MON L 001000-21, *Felicia Jones V. Luanne Peterpaul*, Monmouth County Superior Court, Filed 3/22/21)

Luanne Peterpaul V. Michele Dunn

In August 2020, Peterpaul Filed A Complaint Against Michele Dunn Alleging She Was Injured While On Dunn’s Property. (Case No. MON L 002429-20, *Luanne Peterpaul V. Michele Dunn*, Monmouth County Superior Court, Filed 8/3/20)

<p>LUANNE M. PETERPAUL, Plaintiff, v. MICHELE DUNN, John Does 1-10 and/or ABC Corporations 1-10, Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION - MONMOUTH COUNTY DOCKET NO. CIVIL ACTION COMPLAINT, JURY DEMAND, AND DESIGNATION OF TRIAL COUNSEL</p>
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Plaintiff Luanne Peterpaul ("Plaintiff"), by way of Complaint against defendants Michele Dunn ("Defendant"), John Does 1-10 and ABC Corporations 1-10, says:

5. On August 3, 2018 Plaintiff was lawfully on the Property at Defendant’s express and/or implied invitation.

6. Defendant had a duty, under all circumstances, to provide a safe environment to Plaintiff and to warn her of any hazardous or dangerous conditions at the Property.

7. As of August 3, 2018, Defendant managed, maintained, designed, constructed, assembled, controlled, secured, inspected and/or repaired a rock wall (the "Rock Wall") located near the front entrance to the Property.

8. On and before August 3, 2018, the Rock Wall at the Property was in a hazardous condition.

9. On August 3, 2018, while lawfully on the Property, Plaintiff tripped and fell due to the hazardous condition of the Rock Wall and suffered severe and traumatic injuries.

10. Defendant was negligent in the ownership, management, maintenance, design, construction, inspection, supervision and control of the Property in causing and/or permitting a hazardous condition to remain on the Property, which constituted a danger to those walking on the Property including Plaintiff.

(Case No. MON L 002429-20, *Luanne Peterpaul V. Michele Dunn*, Monmouth County Superior Court, Filed 8/3/20)

- In February 2021, The Case Was Dismissed For Lack Of Prosecution After The Parties Most Likely Agreed To Settle.** (Case No. MON L 002429-20, *Luanne Peterpaul V. Michele Dunn*, Monmouth County Superior Court, Filed 2/13/21)

OCEAN COUNTY SUPERIOR COURT
 OCEAN COUNTY COURTHOUSE
 CIVIL LAW DIVISION
 TOMS RIVER NJ 08754

TELEPHONE - (732) 504-0700 EXT. 64385, COLLEEN BRONZINO
 COURT HOURS: 8:30 AM - 4:30 PM

TEAM 002
 DATE FEBRUARY 12, 2021

DOCKET NO. OCN L -003092 20
 NAME: PETERPAUL LUANNE VS DUNN MICHELE

IT IS HEREBY ORDERED THAT UNDER RULES 1:13-7 OR 4:43-2, THE ABOVE MATTER HAS BEEN DISMISSED WITHOUT PREJUDICE FOR LACK OF PROSECUTION. THIS ORDER CLOSES FILE. JUDGMENTS PREVIOUSLY ENTERED IN THIS CASE ARE NOT AFFECTED BY THIS ORDER.

(Case No. MON L 002429-20, *Luanne Peterpaul V. Michele Dunn*, Monmouth County Superior Court, Filed 2/13/21)

Attorney Record (Criminal Lawsuits)

USA. V. Rubin Diaz

In July 1996, Rubin Diaz Was Charged With Conspiracy To Defraud The United States – Bank Fraud. (Case No. 96-CR-00396-JAP-1, *USA V. Rubin Diaz*, U.S. District Court District Of New Jersey, Filed 7/16/96)

Assigned to: Judge Joel A. Pisano

Defendant (1)
 RUBIN DIAZ
 TERMINATED: 11/03/1997

represented by **K. ANTHONY THOMAS**
 OFFICE OF THE FEDERAL PUBLIC DEFENDER
 1002 BROAD STREET
 NEWARK, NJ 07102
 (973) 645-6347
 Email: anthony_thomas@fd.org
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED
 Designation: Public Defender or Community Defender Appointment

LUANNE M. PETERPAUL
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaullaw.com
 TERMINATED: 11/03/1997
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED
 Designation: CJA Appointment

Pending Counts
 18:371.F CONSPIRACY TO DEFRAUD THE UNITED STATES - BANK FRAUD
 (18:1344(1))
 (1)

Disposition
 AMENDED JUDGMENT 5 yrs prob w/conds., 8 mths home confinement, Restitution to DST Systems Inc. = \$5,570.00, S.A.\$50.00

(Case No. 96-CR-00396-JAP-1, *USA V. Rubin Diaz*, U.S. District Court District Of New Jersey, Filed 7/16/96)

- Peterpaul Was Listed As A Lead Attorney Representing Diaz.** (Case No. 96-CR-00396-JAP-1, *USA V. Rubin Diaz*, U.S. District Court District Of New Jersey, Filed 7/16/96)

In November 1997, As Part Of A Plea Agreement, Diaz Was Sentenced To 1.5 Years Of Probations With Eight Months Of Home Confinement And Was Ordered To Pay \$5,570 In Restitution To DST Systems. (Case No. 96-CR-00396-JAP-1, *USA V. Rubin Diaz*, U.S. District Court District Of New Jersey, Filed 11/3/97)

07/15/1996	19	Plea Agreement as to RUBIN DIAZ (mgr) (Entered: 08/01/1996)
07/18/1996	20	ORDER that deft submit to substance abuse testing & treatment as deemed necessary by PTS. as to RUBIN DIAZ (Signed by Judge Harold A. Ackerman) (mgr) (Entered: 08/01/1996)
08/05/1996	21	TRANSCRIPT filed as to RUBIN DIAZ for dates of 7/15/96 Plea. (jn) (Entered: 08/07/1996)
08/22/1997	22	ORDER as to RUBIN DIAZ, Modifying Conditions of Release , allowing defendant to Travel to the State of Pennsylvania, from 8/24/97 to 8/28/97. Order mailed. (Signed by Judge Harold A. Ackerman) (jn) (Entered: 08/25/1997)
10/23/1997	23	Minutes of 10/23/97 before Judge Harold A. Ackerman as to RUBIN DIAZ, Objections to the PSI Report. Sentencing held. RUBIN DIAZ (1) count(s) 1 (Court Reporter/ESR: P.Lewis) (mgr) (Entered: 11/03/1997)
11/03/1997	24	JUDGMENT RUBIN DIAZ (1) count(s) 1. 5 yrs prob w/conds., 8 mths home confinement, Restitution to DST Systems Inc. = \$5,570.00, S.A.\$50.00 (signed by Judge Harold A. Ackerman)(nm) (mgr) (Entered: 11/03/1997)

(Case No. 96-CR-00396-JAP-1, *USA V. Rubin Diaz*, U.S. District Court District Of New Jersey, Filed 11/3/97)

USA. V. Zhu-En Dong

In January 1998, Zhu-En Dong Was Charged With Interference With Commerce By Threat Or Violence. (Case No. 98-CR-00048-MTB-1, *USA V. Zhu-En Dong*, U.S. District Court District Of New Jersey, Filed 1/26/98)

Case title: USA v. DONG

Date Filed: 01/26/1998

Magistrate judge case number: 2:97-mj-08006

Date Terminated: 05/27/1998

Assigned to: Judge Maryanne Trump Barry

Defendant (1)

ZHU-EN DONG
TERMINATED: 05/28/1998

represented by **LUANNE M. PETERPAUL**
PETERPAUL LAW LLP
700 Bangs Ave
Suite 2
Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaulaw.com
TERMINATED: 05/28/1998
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
Designation: CJA Appointment

Pending Counts

18:1951.F INTERFERENCE WITH COMMERCE BY THREAT OR VIOLENCE (dof
11/96)
(1)

Disposition

48 mths impr., 3 yrs super release, S.A.\$100.00

(Case No. 98-CR-00048-MTB-1, *USA V. Zhu-En Dong*, U.S. District Court District Of New Jersey, Filed 1/26/98)

- **Peterpaul Was Listed As The Lead Attorney Representing Dong.** (Case No. 98-CR-00048-MTB-1, *USA V. Zhu-En Dong*, U.S. District Court District Of New Jersey, Filed 1/26/98)

In May 1998, As Part Of A Plea Agreement, Dong Was Sentenced To 48 Months In Prison Followed By Three Years Of Supervised Release. (Case No. 98-CR-00048-MTB-1, *USA V. Zhu-En Dong*, U.S. District Court District Of New Jersey, Filed 5/27/98)

01/26/1998		PLEA of Guilty: ZHU-EN DONG (1) count(s) 1 , Sentencing for 11:00 4/27/98 for ZHU-EN DONG ; ; Court accepts plea. (mgr) (Entered: 01/28/1998)
01/26/1998	17	Rule 11 APPLICATION by ZHU-EN DONG (mgr) (Entered: 01/28/1998)
01/26/1998	18	Plea Agreement as to ZHU-EN DONG (mgr) (Entered: 01/28/1998)
01/26/1998	19	NOTICE OF ALLOCATION AND ASSIGNMENT Newark (before Judge Maryanne T. Barry) (mgr) (Entered: 01/28/1998)
04/17/1998	20	PETITION by USA & ORDER for Writ of Habeas Corpus as to ZHU-EN DONG, ARDC, Riker's Island, East Elmhurst, NY, ret. 4-23-98 U.S.Probation Office, Newark, NJ, in connection with is sentencing. (it) (Entered: 04/17/1998)
05/06/1998	21	Petition & ORDER as to ZHU-EN DONG, for writ of habeas corpus ret 5/27/98 @9:30am. (Signed by Judge Maryanne T. Barry) (mgr) (Entered: 05/18/1998)
05/06/1998		WRIT of Habeas Corpus issued as to ZHU-EN DONG for 5/27/98 @ 9:30am. (mgr) (Entered: 05/18/1998)
05/27/1998	22	Minutes of 5/27/98 before Judge Maryanne T. Barry as to ZHU-EN DONG, 5K mtn by govt Granted. Sentencing held. ZHU-EN DONG (1) count(s) 1 Ordered deft Remanded. (Court Reporter/ESR: J.Stone) (mgr) (Entered: 05/28/1998)
05/27/1998	24	SEALED DOCUMENT as to ZHU-EN DONG (it) (ys,). (Entered: 05/28/1998)
05/28/1998	23	JUDGMENT ZHU-EN DONG (1) count(s) 1. 48 mths impr., 3 yrs super release, S.A.\$100.00 (signed by Judge Maryanne T. Barry) (nm) party ZHU-EN DONG (mgr) (Entered: 05/28/1998)

(Case No. 98-CR-00048-MTB-1, *USA V. Zhu-En Dong*, U.S. District Court District Of New Jersey, Filed 5/27/98)

USA. V. Ronnie Seamon, Et Al.

In June 1998, Ronnie Seamon Was Charged With Conspiracy To Defraud The United States – Interstate Transport Of Firearms Without A Dealer’s License. (Case No. 98-CR-00357-JWB-4, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 6/5/98)

Assigned to: Judge John W. Bissell
 Appeals court case number: 99-5987

Defendant (4)
RONNIE SEAMON
 TERMINATED: 10/12/1999

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaulaw.com
 TERMINATED: 10/12/1999
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED
 Designation: Retained

Pending Counts
 None

Disposition

Highest Offense Level (Opening)
 None

Terminated Counts
 18:371 CONSPIRACY TO DEFRAUD THE UNITED STATES - Interstate Transport of Firearms w/o Dealers License (18:922(a)(1)(A)) (dof 10/95 thru 2/98) (1)

Disposition
 Impr. 60mos. Supervised Release 3yrs.

(Case No. 98-CR-00357-JWB-4, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 6/5/98)

- **Peterpaul Was Listed As The Lead Attorney Representing Seamon.** (Case No. 98-CR-00357-JWB-4, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 6/5/98)

In October 1999, As Part Of A Plea Agreement, Seamon Was Sentenced To 60 Months In Prison Followed By Three Years Of Supervised Release. (Case No. 98-CR-00357-JWB-4, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 10/12/99)

10/12/1999	85	JUDGMENT RONNIE SEAMON (4) count(s) 1 of Indictment. Impr. 60mos. Supervised Release 3yrs. Spec. conditions: 1. deft. refrain from the illegal possession and/or use of drugs, etc. Spec. Assessment \$100. Ordered deft. remanded. (signed by Judge John W. Bissell) party RONNIE SEAMON (it) (Entered: 10/14/1999)
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(Case No. 98-CR-00357-JWB-4, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 10/12/99)

In September 1998, Seamon Was Charged With Conspiracy To Defraud The United States-Retaliation, Witness Tampering, Retaliating Against A Witness, And Intimidation Or Force Against A Witness. (Case No. 98-CR-00567-JWB-8, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 9/21/98)

Assigned to: Judge John W. Bissell

Defendant (8)

RONNIE SEAMON
TERMINATED: 10/12/1999

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaulaw.com
TERMINATED: 10/12/1999
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
Designation: CJA Appointment

JOSEPH D. ROTELLA
 24 COMMERCE STREET
 SUITE 1726
 NEWARK, NJ 07102
 (973) 621-0333
 Fax: 973-621-0080
 Email: rotellaesq@aol.com
TERMINATED: 10/12/1999
ATTORNEY TO BE NOTICED
Designation: CJA Appointment

Pending Counts

None

Disposition

Highest Offense Level (Opening)

None

Terminated Counts

18:371 CONSPIRACY TO DEFRAUD THE UNITED STATES - Retaliation (18:1513(b)(2)) (dof 05/98 thru 09/98)
 (1)

18:371 CONSPIRACY TO DEFRAUD THE UNITED STATES - Retaliation (18:1513(b)(2)&2 - Witness Tampering (18:1512(b)&2 (dof 08/98 thru 11/98)
 (1s)

18:1513(b)(2)&2 RETALIATING AGAINST WITNESS
 (2s)

18:1512(b)&2 INTIMIDATION OR FORCE AGAINST WITNESS
 (3s)

18:1513(b)(2)&2 RETALIATING AGAINST WITNESS, VICTIM
 (5)

Disposition

Superseded.

Dismissed.

Dismissed.

Dismissed.

Superseded.

(Case No. 98-CR-00567-JWB-8, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 9/21/98)

- **Peterpaul Was Listed As A Lead Attorney Representing Seamon.** (Case No. 98-CR-00567-JWB-8, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 9/21/98)

In October 1999, As Part Of A Plea Agreement, The Charges Were Either Dismissed Or Suspended. (Case No. 98-CR-00567-JWB-8, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 10/12/99)

07/19/1999	183	Notice of MOTION by RONNIE SEAMON 1. For order granting specific performance of the Plea Agreement entered on 8/18/98, more specifically: a. Dismissal of the retaliation indictment; b. Granting of a 5K1.1 motion; c. Withholding opposition to request of probation. . 2. For order to allow the defendant to Withdraw Plea of Guilty in the alternative. . 3. For order granting defendant's request for evidentiary Hearing. . 4. For order for Disclosure of all Grand Jury Transcripts . 5. For order for Bill of Particulars. . 6.For order for Disclosure of material under standard discovery order. . 7.For order for leave to file additional motions that might be appropriate after discovery. . 8. For order for Hearing to determine the nature, if any, of the government's evidence of crimes and wrongful acts not covered in the indictment. . 9. For order to compel under Rule 16, Brady, compelling the government to disclose any and all exculpatory and or favorable information under their control. . 10. For order to compel the government to retain and preserve all "rough notes". . 11. For order for early Disclosure of "Jenck's Act" material . 12. For order to compel the government to produce, in advance of trial, a list of witnesses to be called by the government. . 13. For order to suppress, barring, the introduction of co-conspiratory statements and for a preliminary pretrial in limine hearing todetermine the question of admissibility. . Motion Hearing set for 0:00 8/16/99 or as soon as motion may be heard as to: RONNIE SEAMON, re: (183-1), (183-2), (183-3), (183-4), (183-5), (183-6), (183-7), (183-8), (183-9), (183-10), (183-11), (183-12), (183-13) (Brief and PO subm) (jn) (Entered: 07/20/1999)
08/16/1999	186	Minutes of 8/16/99 before Judge John W. Bissell as to RONNIE SEAMON denying [183-2] motion 2. For order to allow the defendant to Withdraw Plea of Guilty in the alternative, as to RONNIE SEAMON (8)granting [183-3] motion 3. For order granting defendant's request for evidentiary Hearing, as to RONNIE SEAMON (8) Court determined Luanne Peterpaul, Esq. may be a witness and ordered new counsel apointed to represent the deft. for the hearing. (Court Reporter/ESR: IR) (it) (Entered: 08/24/1999)
08/24/1999	189	Minutes of 8/24/99 before Judge John W. Bissell as to RONNIE SEAMON, Order for appointment of co-counse Joseph Rotella, Esq. I. , set evidentiary hearing for 1:30 9/7/99 for RONNIE SEAMON. Ordered briefs on general vs. limited waiver to be submitted by 10:00 a.m. on 9/7/99. (Court Reporter/ESR: Ira Rubenstein) (jn) (Entered: 08/27/1999)
08/24/1999	194	CJA 20 as to RONNIE SEAMON : Appointment of Attorney Joseph Rotella, Esq. (Signed by Judge John W. Bissell) (it) (Entered: 09/14/1999)
09/08/1999	193	Minutes of 9/8/99 before Judge John W. Bissell as to RONNIE SEAMON, At call for Evidentiary hearing , Counsel reported the disposition in the case. Deft. to consent to a 2 point enhancement for obstruction of justice in Cr. 98-357-04; govt. to dismiss Cr. 98-576-08 against the deft; deft. to withdraw motions in Cr. 98-576-08; deft. may seek adjustments in guidelines in Cr. 98-357-04. Deft. sworn and accepted terms. Ordered Oct. 1, 1999 at 2 p.m. fixed as sentencing date in Cr. 98-357-04. Ordered deft. remanded. (Court Reporter/ESR: JS) (it) (Entered: 09/13/1999)
10/12/1999	196	ORDER FOR DISMISSAL of Indictment as to RONNIE SEAMON (Signed by Judge John W. Bissell) (it) (Entered: 10/13/1999)

(Case No. 98-CR-00567-JWB-8, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 10/12/99)

USA. V. Gordon Koehler, Jr.

In March 1996, Gordon Koehler, Jr. Was Charged With Fraud And False Statements. (Case No. 96-CR-00180-JHR-1, *USA V. Gordon Koehler, Jr.*, U.S. District Court District Of New Jersey, Filed 3/29/96)

Assigned to: Judge Joseph H. Rodriguez

Defendant (1)
GORDON T. KOEHLER, JR.
 TERMINATED: 10/07/1996

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: lunne@peterpaullaw.com
 TERMINATED: 10/07/1996
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
 Designation: Retained

Pending Counts
 26:7206A.F FRAUD AND FALSE STATEMENTS
 (3)

Highest Offense Level (Opening)
 Felony

Terminated Counts
 26:7206A.F FRAUD AND FALSE STATEMENTS
 (1-2)

Disposition
 PROBATION - 60 MOS. with 6 Mos. home confinement; SPEICAL ASSESSMENT OF \$50.00

Disposition
 CTS. 1 AND 2 DISMISSED ON APPLICATION OF THE GOVERNMENT

(Case No. 96-CR-00180-JHR-1, *USA V. Gordon Koehler, Jr.*, U.S. District Court District Of New Jersey, Filed 3/29/96)

- **Peterpaul Was Listed As The Lead Attorney Representing Koehler.** (Case No. 96-CR-00180-JHR-1, *USA V. Gordon Koehler, Jr.*, U.S. District Court District Of New Jersey, Filed 3/29/96)

In October 1996, As Part Of A Plea Agreement, Koehler Was Sentenced To 60 Months Of Probations With Six Months Of Home Confinement. (Case No. 96-CR-00180-JHR-1, *USA V. Gordon Koehler, Jr.*, U.S. District Court District Of New Jersey, Filed 10/7/96)

03/29/1996	6	Plea Agreement as to GORDON T. KOEHLER, JR. (ln) Modified on 04/01/1996 (Entered: 03/29/1996)
03/29/1996	7	ORDER of Release as to GORDON T. KOEHLER, JR. (Signed by Judge Joseph H. Rodriguez) (ln) Modified on 04/01/1996 (Entered: 03/29/1996)
03/29/1996		BAIL/BOND executed by GORDON T. KOEHLER, JR. in Amount \$ 1,000.00/OR (ln) Modified on 04/01/1996 (Entered: 03/29/1996)
03/29/1996	8	NOTICE OF ALLOCATION AND ASSIGNMENT Camden (before Judge Joseph H. Rodriguez) (ln) Modified on 04/01/1996 (Entered: 03/29/1996)
10/04/1996	9	Minutes of 10/4/96 before Judge Joseph H. Rodriguez as to GORDON T. KOEHLER JR., Sentencing held. GORDON T. KOEHLER (1) count(s) 3 , and appl. of the Govt to dismiss cts. 1 & 2 of the three count information - granted; bail continued (Court Reporter/ESR: CARL NAMI, JR.) (dt) (Entered: 10/08/1996)
10/07/1996	10	JUDGMENT entered as to GORDEON KOEHLER: PROBATION - 60 MOS. with 6 Mos. home confinement; SPEICAL ASSESSMENT OF \$50.00 , and CTS. 1 AND 2 DISMISSED ON APPLICATION OF THE GOVERNMENT (signed by Judge Joseph H. Rodriguez) (dt) (Entered: 10/08/1996)

(Case No. 96-CR-00180-JHR-1, *USA V. Gordon Koehler, Jr.*, U.S. District Court District Of New Jersey, Filed 10/7/96)

Attorney Record (Employment Lawsuits)

Anthony Jackson V. Union County College

In December 2007, Anthony Jackson Filed An Employment Discrimination Complaint Against Union College. (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

<p>ANTHONY D. JACKSON, Plaintiff, v. UNION COUNTY COLLEGE, Defendant.</p>	<p>Civil Action No. _____ JURY DEMAND</p>
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COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Anthony D. Jackson, by the undersigned attorneys, makes the following averments:

1. Plaintiff Anthony D. Jackson ("Jackson") resides at 151 Pemberton Avenue, Plainfield, New Jersey 07018, within the jurisdiction of this Court. Defendant Union County College ("UCC") maintains its principal place of business at 1033 Springfield Avenue, Cranford, New Jersey 07016, within the jurisdiction of this Court.
2. This is a civil action brought pursuant to the Uniformed Services Employment and Reemployment Rights Act of 1994, 38 U.S.C. §§ 4301 - 4333 ("USERRA").
3. Defendant UCC is an employer within the meaning of 38 U.S.C. § 4303(4).

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

- **Peterpaul Was Listed As The Lead Attorney Representing Union County College.** (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

V.

Defendant

UNION COUNTY COLLEGE

represented by **LUANNE M. PETERPAUL**
PETERPAUL LAW LLP
700 Bangs Ave
Suite 2
Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaullaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

The Plaintiff Stated He Served In The U.S. Naval Reserve While Working At Union County College. (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

6. Jackson joined the United States Naval Reserve (“USNR”) in 1992, and served in the USNR from 1992 to 2000. In 2000, Jackson transferred to the United States Air Force Reserve (“USAFR”), where he served from 2000 to 2002. In 2002, Jackson transferred to the USNR.

7. In 1994, Jackson began working for UCC as a Parking Lot Attendant. In 1995, Jackson applied for and received the position of Permanent Part-Time Security Officer, where he worked Saturday and Sunday nights.

8. In 1998, UCC appointed William Alder (“Alder”) to serve as its Director of Public Safety.

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

- **Despite Notifying Union County College He Was Ordered To Report For Duty And Having His Superior Calls, Along With Providing Evidence Of His Service, The College Suspended Him Without Pay.** (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

9. On or about June 11, 2001, Jackson sent a memorandum to Alder, notifying Alder that Jackson had been ordered to report for training at Sheppard Air Force Base. Jackson enclosed a copy of his official orders with this memorandum, along with a letter from his unit stating that Jackson was required to attend the training. The memorandum and accompanying documents were also provided to Ralph Velez ("Velez"), Associate Director of Public Safety for UCC; and Keith Troutman ("Troutman"), Patrol Supervisor for UCC, and Jackson's immediate supervisor.

10. On or about June 18, 2001, Jackson reported for training at Sheppard Air Force Base. Jackson returned from training on or about August 12, 2001.

11. On or about August 14, 2001, Jackson spoke with Alder by telephone. Alder informed Jackson that Jackson would be suspended for two days without pay for reporting late to work on June 10, 2001.

12. Jackson was suspended without pay on August 18-19, 2001, and returned to work on August 25, 2001.

13. On or about August 15, 2001, while Jackson was speaking with him, Alder requested that Jackson provide him with a schedule listing Jackson's USAFR duty dates until the end of his enlistment. At the time of this request, six years remained of Jackson's service obligation. Jackson informed Alder that he could not comply with Alder's request because the USAFR only provided him with schedules listing his duty dates for the coming year.

14. On or about August 15, 2001, Alder sent a letter to Jackson. In the letter, Alder directed Jackson to provide Alder with a copy of the written procedure that applied to Jackson's USAFR scheduling obligation within thirty days. Alder directed that the procedure specify the

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College*, U.S. District Court District Of New Jersey, Filed 12/14/07)

- **The Plaintiff Was Eventually Discharged From His Position At The College While On Active Duty For The Military.** (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College*, U.S. District Court District Of New Jersey, Filed 12/14/07)

19. Jackson reported for active military duty on October 23, 2001.
20. On or about November 6, 2001, UCC discharged Jackson from his position at UCC, while Jackson was on active military duty.
21. In a letter dated November 6, 2001, Charles Buda ("Buda"), Director of Human Resources for UCC, stated that Jackson had failed to respond to Alder's request for a copy of the "written procedure" applying to Jackson's USAFR "scheduling obligation." Buda also stated that Jackson had not communicated with UCC following his suspension.
22. On or about August 17, 2002, Jackson returned from active military duty.
23. On or about August 26, 2002, Jackson telephoned UCC and spoke with Rosemary Mraz ("Mraz"), an employee in UCC's Human Resources Department. Jackson told Mraz that he was a returning veteran, and that he was ready to return to work. Mraz informed Jackson that he had been terminated in November 2001. Mraz read Jackson a memorandum from Jackson's file stating that Jackson was terminated because he had not responded to a request for orders from his USAFR unit.
24. UCC violated § 4311 of USERRA, among other ways, by suspending Jackson in October 2001, discharging him in November 2001, and failing promptly to reemploy Jackson upon his return from active military duty in August 2002, because of his membership in, or obligation to perform service in, the uniformed services.
25. UCC violated § 4316 of USERRA by, among other ways, discharging Jackson without cause in November 2001.
26. UCC's violations of USERRA were willful.

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

In February 2009, The Parties Agreed To Settle, With Jackson Receiving \$40,000 From Union County College, And The Case Was Dismissed. (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 2/4/09)

CONSENT DECREE

This matter is before the Court for entry of this decree by consent of the parties to effectuate a compromise and settlement of all claims. After review and consideration, the Court believes that entry of this decree is in the interest of justice.

1. Plaintiff, Anthony D. Jackson ("Jackson"), commenced the above entitled action in the United States District Court for the District of New Jersey, alleging that the Defendant Union County College ("UCC") violated the Uniformed Services Employment and Reemployment Rights Act of 1994 ("USERRA") by (a) suspending Jackson in October 2001; (b) discharging Jackson on November 6, 2001, while Jackson was on active military duty; and (c) failing and refusing to allow Jackson to be re-employed in the position of employment at UCC in which Jackson would have been employed if the continuous employment of Jackson had not been interrupted by Jackson's military service from October 23, 2001 to August 17, 2002.

2. UCC denies each and every allegation of violation of USERRA made against it by Jackson in this lawsuit.

REMEDIAL REQUIREMENTS

9. Without admitting the allegations as set forth in the Complaint, and in settlement of the claims of Jackson, UCC shall, within thirty (30) days from the date of entry of this Decree, pay Jackson Forty Thousand and No/100 Dollars (\$40,000.00), from any available source whether UCC funds or third party sources, to satisfy all of his claims for relief, monetary and non-monetary, legal and equitable, which includes his attorney's fees and costs. Jackson will assume any tax liability associated with the sums paid to him by UCC as a result of this Decree. UCC shall pay the required amount by mailing to Jackson a check addressed as follows:

Anthony Jackson
1713 Lake Chapman Drive, Apt #102
Brandon, Florida 33510

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College*, U.S. District Court District Of New Jersey, Filed 2/4/09)

Earnest Polite V. Northwest Essex Community Healthcare Network, Inc., Et Al.

In December 2020, Earnest Polite Filed An Employment Discrimination Complaint Against Northwest Essex Community Healthcare, Inc. And Cheryl Miller, Alleging He Was Discriminated Against Because Of His Race And Sex (Black Male), And Was Retaliated Against. (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc., Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

2. Plaintiff brings this action against the Northwest Essex Community Healthcare Network (NECHN) and Cheryl Miller, R.N. to remedy defendant's discrimination against him on account of his race (black), sex (male) and in retaliation for reporting wrongful conduct by the employees of the defendant in the following particulars:
 - a. Violated the New Jersey Law Against Discrimination (NJLAD) N.J. Stat. Ann. Section 10:5-1 in discriminating against plaintiff on account of his, race (black), sex (male) and by retaliating against him for reporting improper conduct by the employees of the defendant NECHN and by terminating him from employment;
 - b. Further violated the NJLAD allowing and perpetuating a hostile work environment based on race (black) and sex (male) and committing retaliation against plaintiff;
 - c. Violated Title VII of the Civil rights Act of 1964, as amended (Title VII) in discriminating against him on account of his race (black) and sex (male) and by retaliating against plaintiff by terminating the plaintiff from his employment with the defendant NECHN.
 - d. Plaintiff was discriminated against by his employer because of his race (black) and or sex (male) and or by way of retaliation. But for his race (black) and sex (male), he would not have been terminated from his employment
 - e. Defendants intentionally inflicted mental distress on the plaintiff and assaulted him.

PARTIES

3. Plaintiff Ernest Polite is a 68-year-old black male resident of the United States of America y residing at 18 Marshall Street, apartment 5Q, Irvington, New Jersey 07111.
4. North West Essex Behavior Health Network is a corporation of the State of New Jersey, doing business at 570 Belleville Ave. Belle Ville, New Jersey 07109.
5. Cheryl Miller is a registered nurse employed by the defendant NECHN and is a resident of the State of New Jersey.

(Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

- **Peterpaul Was Listed As The Lead Attorney Representing The Defendants.** (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

The Plaintiff Claimed That He Was Sexually Harassed By Miller Including “Attempting To Kiss The Plaintiff And Touching The Plaintiff Inappropriately.” (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

7. The plaintiff is a black male 68 years old who was hired in March 2018 as a temporary employee by NECHN, which provides psycho therapeutic services, substances abuse services and other related services.
8. From April 2018 up to and including November 2019, the plaintiff was subject to sexual harassment. The plaintiff was harassed by co-employee Cheryl Miller the defendant by attempting to kiss the plaintiff and touching the plaintiff inappropriately.
9. Plaintiff's co-employee Cheryl Miller also would stalk the plaintiff while he was on the job both within and or outside her scope of employment.
10. The inappropriate acts of Cheryl Miller and her assault on plaintiff were reported by the plaintiff to his supervisor Harold Schuman, who took no action.
11. After being subject to continuous acts of sexual harassment, the plaintiff filed a complaint with Human Resources concerning an incident which occurred on or about November 29, 2018 at approximately 10:15 A.M.
12. At the time of the November 29, 2018 incident, co-employee Cheryl Miller acting within and or outside the scope of her employment forcibly grabbed the face of the plaintiff with both hands to face forward in an attempt to kiss him.
13. Cheryl Miller admitted to such inappropriate conduct in a statement dated March 3, 2018.
14. At various times within and or outside the scope of her employment Cheryl Miller interfered with plaintiff in the performance of his duties, putting clients at risk in retaliation against him for spurning her sexual advances.
15. At various times within and or outside her scope of employment Ms. Miller has made false statements against plaintiff to clients and other staff members in retaliation for spurning her sexual advances to injure him and get him fired from his job.
16. On or about December 14, 2019, the plaintiff complained about the actions of Ms. Miller to his supervisor Howard Schulman, who failed to take any action against Cheryl Miller for her illegal and wrongful conduct.

(Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

- **The Plaintiff Reported The Inappropriate Behavior To His Supervisor, Who Took No Action; The Plaintiff Eventually Filed A Complaint With Human Resources, To Which Miller Admitted To The Accusations.** (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)
- **The Plaintiff Further Claimed Miller Had Made “False Statements Against The Plaintiff To Clients And Other Staff Members In Retaliation For Spurning Her Sexual Advances To Injure Him And Get Him Fired.”** (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

The Plaintiff Stated That Miller “Was Also Frequently Intoxicated Or Under The Influence Of Drugs Or Alcohol At Work And Had A Substance Abuse Problem Which NECHN Was Aware Of And Did Nothing About.” (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

17. Cheryl Miller within and or outside the scope of employment was also frequently intoxicated or under the influence of drugs and alcohol at work and had a substance abuse problem which NECHN was aware of and did nothing about.

18. The substance abuse problem of Cheryl Miller was so bad that she had her nursing license suspended in 2012.

19. Instead of addressing the complaints of the plaintiff, the plaintiff was wrongfully dismissed shortly after making his complaint against Ms. Miller for purportedly failing to provide proper documentation. This claim was a pretext to attempt to justify the wrongful dismissal of the plaintiff.

(Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

- **Instead Of Addressing The Complaints, The Plaintiff Was Wrongfully Dismissed Shortly After Making His Complaint.** (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

In April 2021, The Complaint Was Dismissed Without Prejudice After The Parties Most Likely Agreed To Settle. (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 4/14/21)

<p>ERNEST POLITE,</p> <p style="text-align: center;"><i>Plaintiffs,</i></p> <p style="text-align: center;">v.</p> <p>NORTHWEST ESSEX COMMUNITY HEALTHCARE NETWORK, INC., and CHERYL MILLER,</p> <p style="text-align: center;"><i>Defendants.</i></p>

Civil Action No. 20-20579
(JMV) (MF)

ORDER

John Michael Vazquez, U.S.D.J.

This matter comes before the Court by way of Defendants’ removal on December 30, 2020, D.E. 1. And it

APPEARING that the Court entered an order on February 24, 2021, alerting Plaintiff that the case had been pending for more than three months without any proceedings having been taken therein. D.E. 3. The letter cautioned that the case would be called on or around March 15, 2021, and if no sufficient reason was provided in writing, the case would be dismissed, *id.*; and it further

APPEARING that Plaintiff filed proof of service in the original state court matter on March 1, 2021, but there has been no further movement in this case;

THEREFORE, for the foregoing reasons, and for good cause show,

IT IS on this 14th day of April, 2021,

ORDERED that Plaintiff’s Complaint, D.E. 1-1 is **DISMISSED without prejudice**; and it is further

(Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 4/14/21)

Barbara Watford V. Union Community College, Et Al.

In November 2006, Barbara Watford Filed An Employment Discrimination Complaint Against Union Community College. (Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

Plaintiff

BARBARA J. WATFORD

represented by **BARBARA J. WATFORD**

P.O. BOX 312
KENDALL PARK, NJ 08824
732-801-0480
PRO SE

DAWN L. JACKSON

THE LAW OFFICE OF DAWN L. JACKSON, LLC
897 MCBRIDE AVENUE
WEST PATERSON, NJ 07424
973-256-2231
Fax: 973-256-7667
TERMINATED: 03/13/2009
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

UNION COUNTY COMMUNITY COLLEGE
TERMINATED: 06/16/2008

represented by **LUANNE M. PETERPAUL**

PETERPAUL LAW LLP
700 Bangs Ave
Suite 2
Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaulaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

- **Peterpaul Was Listed As The Attorney Representing Union Community College.** (Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

The Plaintiff Alleged The School Did Not Adhere To The Terms Of The Collective Bargaining Contract Agreement. (Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

Plaintiff requests that the court consider this Amendment to add The Union County College Staff Association/NJEA. Plaintiff was under a bargaining agreement between The Board of Trustees of Union County College and The Union County College Staff Association/NJEA when Plaintiff's position was terminated. Plaintiff states Defendant breach the contract for a promotion from Department Secretary to Administrative Assistant after the Plaintiff assist getting the new Practical Nursing Program up and running in 2003. Plaintiff contends that The Union County College Staff Association/NJEA Officials did not follow the contract and make the Defendant Union County College adhere to the terms of the bargaining contract agreement. Plaintiff contends that The Union County College Staff Association/NJEA and the Defendant Union County College did not abide by the following Articles under the contract agreement. The Defendant Union County College and The Union

(Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

- **The Plaintiff Further Alleged She Was Not Compensated For Overtime Worked.**

(Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

County College Staff Association/NJEA Officials as outlined in the agreement did not abide by the following articles:

Article VIII Hours of Work and Overtime: Overtime Hours worked in excess of thirty-five (35) hours per week shall be paid at a rate of one and one-half (1-1/2) times the employee's base hourly rate. Plaintiff contends that The Union County College Staff Association/NJEA did not make the Defendant Union County College pay the Plaintiff time 1 and 1/2 as outlined in the contract agreement when she worked in excess of the required 35-hour workweek.

(Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

In January 2010, The Parties Agreed To Settle And The Case Was Dismissed. (Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 1/26/10)

BARBARA J. WATFORD,	:	
	:	Civil Action No. 06-5542 (FSH)
Plaintiff,	:	
v.	:	
	:	ORDER
UNION COUNTY COMMUNITY COLLEGE.	:	
	:	
Defendant.	:	

It appearing that it has been reported to the Court that the above-entitled action has been settled,

IT IS on this the 26th day of January, 2010,

ORDERED that this action is hereby dismissed without costs and without prejudice to the right, upon good cause shown within 30 days, to make an application to the Court if the settlement is not consummated. Failure to consummate the settlement will not result in the reopening of this matter by the Court to address the merits of the case; rather, if the settlement is not consummated, the Court will entertain an application solely to enforce the terms of the settlement agreement. Counsel are on notice that the good cause requirement will be stringently applied, and will require an affidavit detailing (a) the terms of the settlement agreement; and (b) why settlement could not be consummated within 30 days; and it is further

ORDERED that the terms of the settlement agreement are incorporated herein by reference and the Court shall retain jurisdiction over the settlement agreement to enforce its terms.

(Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 1/26/10)

William Waller V. Easter Seal Society Of New Jersey

In December 1998, William Waller Filed A Job Discrimination Complaint On The Basis Of Race Against Easter Seal Society Of New Jersey. (Case No. 98-CV-05632-AJL, *William Waller V. Easter Seal Society Of New Jersey*, U.S. District Court District Of New Jersey, Filed 12/10/98)

WALLER v. EASTER SEAL SOCIETY
 Assigned to: Judge Alfred J. Lechner, Jr.
 Demand: 50
 Cause: 42:1981 Job Discrimination (Race)

Date Filed: 12/10/1998
 Date Terminated: 05/05/1999
 Jury Demand: Plaintiff
 Nature of Suit: 442 Civil Rights: Jobs
 Jurisdiction: Federal Question

Plaintiff

WILLIAM E. WALLER

represented by **JENNIFER MYERS CHALAL**
 SPECTOR GADON & ROSEN PC
 1635 MARKET STREET
 7TH FLOOR
 PHILADELPHIA, PA 19103
 215-241-8888
 Email: jmyers@lawsgr.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

EASTER SEAL SOCIETY OF NEW JERSEY

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaullaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 98-CV-05632-AJL, *William Waller V. Easter Seal Society Of New Jersey*, U.S. District Court District Of New Jersey, Filed 12/10/98)

- **Peterpaul Was Listed As The Lead Attorney Representing Easter Seal Society Of New Jersey.** (Case No. 98-CV-05632-AJL, *William Waller V. Easter Seal Society Of New Jersey*, U.S. District Court District Of New Jersey, Filed 12/10/98)

In May 1999, The Case Was Dismissed After The Parties Most Likely Agreed To Settle.

(Case No. 98-CV-05632-AJL, *William Waller V. Easter Seal Society Of New Jersey*, U.S. District Court District Of New Jersey, Filed 5/4/99)

02/10/1999	6	Minute entry: Proceedings recorded by Ct-Reporter: Joanne Caruso.; Minutes of: 2/10/99; The following actions were taken, dates previously set. By Judge Alfred J. Lechner, Jr. (bl) (Entered: 02/11/1999)
05/04/1999	7	ORDER, dismissing action (signed by Judge Alfred J. Lechner, Jr.) (bl) (Entered: 05/05/1999)
05/05/1999		Case closed (bl) (Entered: 05/05/1999)

(Case No. 98-CV-05632-AJL, *William Waller V. Easter Seal Society Of New Jersey*, U.S. District Court District Of New Jersey, Filed 5/4/99)

Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.

In May 1998, Jorge Saraceno Filed A Complaint Against Springfield Senior Citizen Housing, Inc., Alleging Violations Of The Fair Labor Standards Act.

(Case No. 98-CV-0221-NHP, *Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.*, U.S. District Court District Of New Jersey, Filed 5/12/98)

SARACENO v. SPRINGFIELD SENIOR
 Assigned to: Judge Nicholas H. Politan
 Demand: 50
 Cause: 15:2(a) Fair Labor Standards Act

Date Filed: 05/12/1998
 Date Terminated: 04/30/1999
 Jury Demand: Plaintiff
 Nature of Suit: 710 Labor: Fair Standards
 Jurisdiction: Federal Question

Plaintiff

JORGE SARACENO

represented by **BRUNILDA BONILLA**
 618 Newark Avenue
 Suite 220
 Jersey City, NJ 07306
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

SPRINGFIELD SENIOR CITIZEN HOUSING, INC.

represented by **LUANNE M. PETERPAUL**
PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaullaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 98-CV-0221-NHP, *Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.*, U.S. District Court District Of New Jersey, Filed 5/12/98)

- **Peterpaul Was Listed As The Lead Attorney Representing Springfield Senior Citizen Housing.** (Case No. 98-CV-0221-NHP, *Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.*, U.S. District Court District Of New Jersey, Filed 5/12/98)

In April 1999, The Parties Agreed To Settle And The Case Was Dismissed. (Case No. 98-CV-0221-NHP, *Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.*, U.S. District Court District Of New Jersey, Filed 4/29/99)

02/09/1999	6	ORDER, setting pretrial conference for 10:30 4/15/99 (signed by Mag. Judge Ronald J. Hedges) (sr) (Entered: 02/10/1999)
04/29/1999	7	ORDER, dismissing action as settled w/out costs & w/out prejudice (signed by Judge Nicholas H. Politan) (sr) (Entered: 04/30/1999)
04/30/1999		Case closed (sr) (Entered: 04/30/1999)

(Case No. 98-CV-0221-NHP, *Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.*, U.S. District Court District Of New Jersey, Filed 4/29/99)

Attorney Record (Union Lawsuits)

1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.

In April 2015, 1199 SEIU United Healthcare Workers East Filed A Complaint Against GRE Properties Jersey City And Several Others, Alleging Violations Of Labor Contracts. (Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

1199 SEIU UNITED HEALTHCARE
WORKERS EAST,

Plaintiff,

-versus-

Civil Action No.

GRE PROPERTIES JERSEY CITY LLC,
GRE JERSEY CITY INC., and MAJESTIC
REHABILITATION AND NURSING
CENTER, INC.,

Defendants.

COMPLAINT

Plaintiff 1199 SEIU United Healthcare Workers East (the "Union"), by its attorneys, as and for its complaint against Defendants GRE Properties Jersey City LLC, GRE Jersey City Inc., and Majestic Rehabilitation and Nursing Center, Inc. (collectively "Defendants"), respectfully alleges the following:

I. JURISDICTION AND VENUE

1. This action is brought pursuant to § 301 of the Labor Management Relations Act ("LMRA"), 29 U.S.C. §185, to compel arbitration of a grievance filed pursuant to a collective bargaining agreement between Plaintiff and the predecessor owner/operator of a for-profit long-term care nursing facility formerly known as "Liberty House Nursing Home of Jersey

(Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

- **Peterpaul Was Listed As A Lead Attorney Representing GRE Properties.** (Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

Defendant

GRE PROPERTIES JERSEY CITY LLC.

represented by **ANDREW BAYER**
PASHMAN STEIN WALDER HAYDEN
21 Main Street
Suite 200E
Hackensack, NJ 07601-7086
United Sta
201-488-8200
Fax: 201-488-5556
Email: abayer@pashmanstein.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

LUANNE M. PETERPAUL
PETERPAUL LAW LLP
700 Bangs Ave
Suite 2
Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaulaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

GRE JERSEY CITY, INC.

represented by **ANDREW BAYER**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

LUANNE M. PETERPAUL
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

The Plaintiff Union Alleged GRE Properties Did Not Honor The Collective Bargaining Contract Agreed To By The Parties Relating To The Employment And Transferring Of Employees. (Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

8. Since approximately 1969, the Union and its predecessor labor organization represented a bargaining unit of employees employed at the Nursing Home in the titles of Registered Nurses, Licensed Practical Nurses, Certified Nurses' Aides, Recreation Aides, Dietary Aides and Housekeepers (collectively and hereinafter, "Unit Employees") for the purpose of establishing wages, hours and other terms and conditions of employment. At all times since 1969, the wages, hours and working conditions of Unit Employees have been continuously set forth in and determined by a series of collective bargaining agreements ("CBAs") between the Union and Liberty House Nursing Home of Jersey City, Inc. ("Liberty House") which, until March 1, 2015, was the owner/operator of the Nursing Home.

9. By its terms, the most recent CBA between the Union and Liberty House was effective from March 13, 2008 through February 28, 2013. Pursuant to that CBA, an interest arbitration between the Union and Liberty House was conducted in 2012, and the award issued on November 7, 2012 in that interest arbitration extended the terms of the CBA, as modified in the award, through June 30, 2016. Annexed hereto as Exhibit A is a copy of the CBA effective from March 13, 2008 through February 28, 2013. Annexed hereto as Exhibit B is a copy of the interest arbitration award extending the CBA through June 30, 2016.

19. Effective March 1, 2015 (the "Transfer Date"), Liberty House transferred the operation of the Nursing Home to Defendants. On that date, the name of the Nursing Home was changed to Majestic Rehabilitation and Nursing Center.

20. On and after the Transfer Date, Defendants have continued the employment at the Nursing Home of almost all of the Unit Employees. Specifically, of the 135 Unit Employees employed by Liberty House at the Nursing Home immediately prior to the Transfer Date, all but one were offered continued employment there by Defendants. 124 of these Unit Employees have continued to work at the Nursing Home after the transfer. (Ten Unit Employees voluntarily left.) No new employees have been hired into the titles (e.g., RN, CNA) represented by the Union.

(Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

In April 2016, The Case Was Jointly Dismissed With Prejudice After The Parties Most Likely Agreed To Settle. (Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/21/16)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
-----X
1199 SEIU UNITED HEALTHCARE
WORKERS EAST,

Plaintiff,

- vs. -

Civil Action No.:
15-2345 (SRC-CLW)

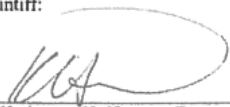
GRE PROPERTIES JERSEY CITY LLC,
GRE JERSEY CITY INC., AND MAJESTIC
REHABILITATION AND NURSING
CENTER, INC.,

STIPULATION OF
DISMISSAL

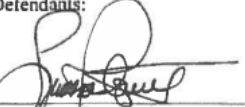
Defendants.
-----X

IT IS HEREBY STIPULATED AND AGREED by plaintiff 1199 SEIU UNITED HEALTHCARE WORKERS EAST and defendants GRE PROPERTIES JERSEY CITY LLC, GRE JERSEY CITY INC., and MAJESTIC REHABILITATION AND NURSING CENTER, INC., that any and all claims herein against all defendants are hereby withdrawn with prejudice.

For Plaintiff:

By: 
Katherine H. Hansen, Esq.

For Defendants:

By: 
Luanne Peterpaul, Esq.

GLADSTEIN, REIF & MEGINNISS, LLP
817 Broadway, 6th Floor
New York, New York 10003
(212) 228-7727

GLUCKWALRATH LLP
11 Wharf Ave., Suite 4
Red Bank, New Jersey 07701
(732) 530-8822

Attorneys for plaintiff

Attorneys for defendants

(Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/21/16)

Edwin Stier, Et Al. V. Town Motors

In July 1996, Edwin Stier And The Teamsters Industrial Employees' Pension And Welfare Funds Filed A Complaint Against Town Motors, Alleging Violations Of The Employee Retirement Income Security Act, Most Likely Relating To Pensions. (Case No. 96-CV-03302-WHW, *Edwin Stier, Et Al. V. Town Motors*, U.S. District Court District Of New Jersey, Filed 7/10/96)

STIER, et al v. TOWN MOTORS
 Assigned to: Judge William H. Walls
 Demand: 50
 Cause: 29:1132 E.R.I.S.A.-Employee Benefits

Date Filed: 07/10/1996
 Date Terminated: 08/26/1997
 Jury Demand: None
 Nature of Suit: 791 Labor: E.R.I.S.A.
 Jurisdiction: Federal Question

Arbitrator

RALPH V. MARTIN

represented by **RALPH V. MARTIN**
 WILLIAMS, CALIRI, MILLER, & OTLEY, PC
 1428 ROUTE 23
 PO BOX 995
 WAYNE, NJ 07474
 (973) 694-0800
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED

Plaintiff

EDWIN H. STIER
 CHAIRPERSON OF THE BOARD OF TRUSTEES OF THE TEAMSTERS INDUSTRIAL
 EMPLOYEES PENSION AND WELFARE FUNDS

represented by **KEVIN PATRICK MCGOVERN**
 METS, SCHIRO & MCGOVERN
 838 GREEN STREET
 SUITE 102
 ISELIN, NJ 08830
 732-636-0040
 Fax: 732-636-5705
 Email: kmcgovern@msmlaborlaw.com
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED

Plaintiff

THE TEAMSTERS INDUSTRIAL EMPLOYEES PENSION AND WELFARE FUNDS

represented by **KEVIN PATRICK MCGOVERN**
 (See above for address)
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED

V.

Defendant

TOWN MOTORS

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaullaw.com
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED

(Case No. 96-CV-03302-WHW, *Edwin Stier, Et Al. V. Town Motors*, U.S. District Court District Of New Jersey, Filed 7/10/96)

- **Peterpaul Was Listed As The Lead Attorney Representing Town Motors.** (Case No. 96-CV-03302-WHW, *Edwin Stier, Et Al. V. Town Motors*, U.S. District Court District Of New Jersey, Filed 7/10/96)

In September 1997, The Parties Agreed To Settle And The Case Was Dismissed. (Case No. 96-CV-03302-WHW, *Edwin Stier, Et Al. V. Town Motors*, U.S. District Court District Of New Jersey, Filed 9/22/97)

08/25/1997	10	Report and ORDER, of settlement (signed by Judge William H. Walls (bl) (Entered: 08/26/1997)
08/26/1997		Case closed (bl) (Entered: 08/26/1997)
08/26/1997	11	ORDER, dismissing action (signed by Judge William H. Walls) (bl) (Entered: 08/27/1997)
09/22/1997	12	STIPULATION of dismissal pursuant to FRCP 41(a) (l) (ii) (bl) (Entered: 09/24/1997)

(Case No. 96-CV-03302-WHW, *Edwin Stier, Et Al. V. Town Motors*, U.S. District Court District Of New Jersey, Filed 9/22/97)

Gary Kendellen V. Paramus Ford, Inc.

In March 2007, Gary Kendellen, Director Of The Region 22 Of The National Labor Relations Board For And On Behalf Of The National Labor Relations Board, Filed A

Complaint Against Paramus Ford, Inc. (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

KENDELLEN v. PARAMUS FORD, INC.
Assigned to: Judge Jose L. Linares
Referred to: Magistrate Judge C. C. Cecchi
Cause: 29:160(1) National Labor Relations Act

Date Filed: 03/19/2007
Date Terminated: 01/25/2008
Jury Demand: None
Nature of Suit: 720 Labor: Labor/Mgt. Relations
Jurisdiction: U.S. Government Plaintiff

Plaintiff

GARY T. KENDELLEN
Regional Director of Region 22 of the National Labor Relations Board for and on behalf of the National Labor Relations Board

represented by **MARGUERITE GREENFIELD**
NATIONAL LABOR RELATIONS BOARD
REGION 22
20 WASHINGTON PLACE
NEWARK, NJ 07102-3115
973 645-2100
Fax: 973-645-3852
Email: margo.greenfield@nlrb.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

PARAMUS FORD, INC.

represented by **LUANNE M. PETERPAUL**
PETERPAUL LAW LLP
700 Bangs Ave
Suite 2
Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaulaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

- **Peterpaul Was Listed As The Lead Attorney Representing Paramus Ford.** (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

The Plaintiff Filed A Petition To Direct Paramus Ford To Recognize And Bargain With Local 355 United Service Workers Union, IUJAT, AFL-CIO Pending The Resolution Of Unfair Labor Practice Proceedings Before The National Labor Relations Board. (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

Petitioner seeks an interim order directing Respondent Paramus Ford, Inc. to recognize and bargain with Local 355 United Service Workers Union, IUJAT, AFL-CIO pending the resolution of unfair labor practice proceedings before the National Labor Relations Board, an agency of the United States government.

This court is asked to find that there is reasonable cause to believe that Respondent is a successor to Pistilli Ford, Inc., and that Respondent unlawfully failed to recognize and bargain with the incumbent Union. An employer is a successor when there is substantial continuity between the predecessor and successor enterprises and when a majority of the employees of the new employer in an appropriate unit had been employed by the predecessor. Respondent's bargaining obligation here matured when it began normal operations on February 13 at which time the Union was the representative of a majority of its parts and service employees.

Petitioner's support for its reasonable cause argument is set forth in the transcript of an administrative proceeding before Administrative Law Judge Steven Davis, and Judge Davis' decision and recommended order dated January 31, 2007 finding the violations alleged in the Complaint. Respondent's exceptions to that decision are pending before the National Labor Relations Board.

(Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

- **The Plaintiff Alleged Paramus Ford Unlawfully Refused To Bargain With The Union Even Though A Majority Of Its Employees Had Worked For The Prior Company Which Had A Collective Bargaining Relationship With The Union.** (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

In this proceeding, the Regional Director of Region 22 of the National Labor Relations Board, herein called the Board, pursuant to Section 10(j) of the National Labor Relations Act, as amended, herein called the Act, 29 U.S.C. § 160(j), petitions this district court for temporary injunctive relief pending the Board's final disposition of this matter.

On August 22, 2006, the Acting Regional Director for Region 22, which encompasses northern New Jersey, issued a Complaint and Notice of Hearing pursuant to Section 10(b) of the Act, upon unfair labor practice charges filed on June 13, 2006 by Local 355, United Service Workers Union, IUJAT, ALF-CIO, herein called the Union, against Paramus Ford, Inc., herein called the Respondent. The Complaint alleged that Respondent has engaged in unfair labor practices within the meaning of Section 8(a)(1) and (5) of the Act. The Acting Regional Director alleged that the Respondent, Paramus Ford, Inc., a successor to Pistilli Ford, Inc., unlawfully refused to bargain with the incumbent union notwithstanding that a majority of its employees had worked for the predecessor which had a collective bargaining relationship with the Union.

The Board conducted a hearing on the unfair labor practices alleged in the Complaint before an administrative law judge of the Board on October 31, 2006. On January 31, 2007, Administrative Law Judge Steven Davis issued a Decision and Order finding the violations as alleged.¹ Respondent's exceptions to that decision, filed on March 14, 2007, are pending before the Board.

On March 14, 2007, the Board authorized the Petitioner to seek injunctive relief pursuant to Section 10(j) of the Act directing Respondent to cease and desist from certain unfair labor practices and to take certain affirmative action. This Memorandum is submitted in support of the Petition.

(Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

In April 2007, A Temporary Injunction Was Granted. (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 4/11/07)

GARY T. KENDELLEN, Regional Director of Region 22 of the National Labor Relations Board for an on behalf of the National Labor Relations Board,)	
)	
)	Civil Action No.: 07-1297 (JLL)
Petitioner,)	
)	ORDER IMPOSING
v.)	INJUNCTIVE RELIEF
)	
PARAMUS FORD, INC.,)	
)	
Respondent.)	

LINARES, District Judge.

This matter comes before the Court upon the verified petition and declaration of Gary T. Kendellen, Regional Director of Region 22 of the National Labor Relations Board (the "NLRB"), for and on behalf of the Board, for a temporary injunction pursuant to Section 10(j) of the National Labor Relations Act, as amended, 29 U.S.C. § 160(j) (the "NLRA"), pending final disposition of the matters now before the Board on Case 22-CA-27444 and upon the issuance of an Order to Show Cause why injunctive relief should not be granted as prayed in said petition. The Court, upon consideration of the pleadings, evidence, memoranda, argument of counsel and the entire record in the case, has found and concluded that there is reasonable cause to believe that Respondent, Paramus Ford, Inc., has engaged in and is engaging in acts and conduct in violation of Section 8(a)(1) and (5) of the Act and that the requested temporary injunctive relief pursuant to Section 10(j) of the Act is just and proper in this case.

IT IS THIS 11th day of April, 2007,

ORDERED that pending the final disposition of the matters involved herein now pending before the National Labor Relations Board, or for a six (6) month period from the date of issuance of the injunction, whichever is shorter, Respondent, its officers, representatives, agents, alter egos, successors, assigns, servants, employees, and all members and persons acting in concert or participation with it, are hereby ordered to:

(Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 4/11/07)

- **In January 2008, The Parties Agreed To Settle And The Injunction Was Terminated.** (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 1/24/08)

**ORDER DISSOLVING TEMPORARY INJUNCTION AND
TERMINATING PROCEEDING**

This Court having on April 11, 2007, entered a temporary injunction enjoining and restraining Respondent from engaging in certain acts and conduct set forth therein pending the final disposition of the matters involved pending before the National Labor Relations Board; and it appearing to the Court that the National Labor Relations Board has duly issued its Decision and Order which is the final disposition of the matters involved, and pursuant to Rule 41 (a) (2) of the Federal Rules of Civil Procedure, it is therefore

ORDERED that the temporary injunction entered herein on April 11, 2007, be and the same hereby is vacated and dissolved and the proceeding herein be and the same hereby is terminated without costs to either party.

(Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 1/24/08)

St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO

In August 2009, St. Mary's Hospital Filed A Complaint Against JNESO District Council, IEOU, AFL-CIO. (Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

St. MARY'S HOSPITAL,	:	SUPERIOR COURT OF NEW JERSEY
	:	:CHANCERY DIV.: PASSAIC COUNTY
	:	:DOCKET NO.
	:	
PLAINTIFF,	:	<u>CIVIL ACTION</u>
	:	
VS	:	VERIFIED COMPLAINT
	:	
JNESO, DISTRICT COUNCIL 1,	:	
IUOE, AFL-CIO,	:	
	:	
DEFENDANT.	:	

Plaintiff, St. Mary's Hospital (hereinafter referred to as "St. Mary's" or "The Hospital"), located at 350 Boulevard, Passaic, New Jersey 07055, brings this action pursuant to R.R. 4:67-1 et seq. and N.J.S.A. 2A: 24-1 et seq. to vacate an arbitration award. Plaintiff says:

1. St. Mary's Hospital is the primary provider of quality healthcare to the Passaic and Bergen communities, and to areas of Essex and Hudson County. It is a non-profit acute care hospital offering a broad range of health care services and community outreach services. St. Mary's is a 287-bed hospital, which provides care to a large number of indigent patients and poor patients. St. Mary's Hospital is the sole surviving hospital in the City of Passaic.

(Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

- **Peterpaul Was Listed As A Lead Attorney Representing St. Mary's Hospital.** (Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

Plaintiff
ST. MARY'S HOSPITAL

represented by **FRANK J. PETERPAUL**
PETERPAUL, CLARK & CORCORAN, PC
ONE CLEVELAND PLACE
SPRINGFIELD, NJ 07081
(973) 467-5888
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

LUANNE M. PETERPAUL
PETERPAUL LAW LLP
700 Bangs Ave
Suite 2
Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaulaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

St. Mary's Sought To Vacate An Award Rendered In Arbitration Against St. Mary's In Favor Of The Union. (Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

Union"), is a labor organization. It represents Registered Nurses, and Technical employees employed by the Hospital. The terms and conditions of employment of the Registered Nurses and Technicians are governed by separate collective bargaining agreements between the Hospital and JNESO.

3. Plaintiff requests this Court to vacate the Award rendered by Gerard G. Restaino, Arbitrator, on April 15, 2009 ("The Award", Exhibit P-1).

4. In 2007, St Mary's purchased the assets of Passaic General Hospital, which had previously merged with Beth Israel Hospital. Passaic General was in bankruptcy.

5. After St. Mary's purchased the assets of Passaic General/Beth Israel, St. Mary's moved its entire operation into the Passaic General facility, located at 350 Boulevard, Passaic, New Jersey.

6. JNESO represented Registered Nurses and Technical Employees employed by Passaic General/Beth Israel for the purpose of collective bargaining regarding their terms and conditions of employment.

7. The Registered Nurses and Technical employees at St. Mary's Hospital were not unionized prior to the move into the Passaic General building.

(Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

- **The Award Of \$677,904.65 Was Related To Allegedly Unjust Termination Of The Hospital's Employees.** (Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

32. The Award does not find any facts regarding the seniority status of the named grievants or the seniority status of any other employee of St. Mary's.

33. The named grievants were laid off in proper seniority order. They exercised contractual rights and filled other jobs at the hospital.

34. The named grievants received hand delivered letters regarding their layoffs. The letters were not offered in evidence.

35. Copies of the layoff letters were mailed to the Union.

36. The Award, in the amount of \$677,904.65 is stated as "the cost to the employer." There is no finding that the grievants sustained any loss, nor any finding regarding their interim earnings or possible mitigation of damages.

37. The Arbitrator did not consider relevant provisions of the contract.

(Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

In April 2010, Court Denied The Motion And The Award Was Granted. (Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 4/7/10)

<p>ST. MARY'S HOSPITAL, Plaintiff, vs. JNESO, DISTRICT COUNCIL 1, IUOE, AFL-CIO, Defendant.</p>	<p>Honorable Faith Hochberg Civil Action No.: 09-CV-03936 (FSH) CIVIL ACTION CONSENT ORDER CONFIRMING ARBITRATION AWARD</p>
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THIS MATTER having come before the Court by Peterpaul & Clark, (Luanne M. Peterpaul, Esq., appearing) attorneys for Plaintiff, pursuant to a Motion to Vacate an Arbitration Award and by Kroll Heineman, LLC (Curtiss T. Jameson, Esq., appearing) on a counterclaim to confirm an Arbitration Award; this Court having fully considered the moving and opposition papers submitted by the parties, and with the Consent of the parties, and for good and sufficient cause shown;

(Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 4/7/10)

BUSINESS RECORDS

Luanne Peterpaul is the current manager of the New Jersey-domiciled business Peterpaul Law LLP, which was incorporated in 2016 and is currently active. Between 2020 and 2021, Peterpaul Law received two Paycheck Protection Program loans, totaling \$115,642; the loans, with interest, were fully forgiven. Interestingly despite listing fewer employees for the second loan, the company received approximately \$5,000 more.

Peterpaul is a former manager of the New Jersey-domiciled businesses Garden State Equality LLC and One Cleveland Place Associates, LLC.

Peterpaul Law LLP

In July 2016, Peterpaul Incorporated Peterpaul Law LLP As A Domestic For-Profit Entity With The New Jersey Department Of Treasury. (New Jersey Department Of Treasury, Filed 7/9/16)

Status Report For: PETERPAUL LAW LLP
 Report Date: 8/2/2023
 Confirmation Number: 232143077167

IDENTIFICATION NUMBER, ENTITY TYPE AND STATUS INFORMATION

Business ID Number: 0450089143
 Business Type: DOMESTIC LIMITED LIABILITY PARTNERSHIP
 Status: ACTIVE
 Original Filing Date: 07/09/2016
 Stock Amount: N/A
 Home Jurisdiction: NJ
 Status Change Date: NOT APPLICABLE

REVOCATION/SUSPENSION INFORMATION

DOR Suspension Start Date: N/A
 DOR Suspension End Date: N/A
 Tax Suspension Start Date: N/A
 Tax Suspension End Date: N/A

ANNUAL REPORT INFORMATION

Annual Report Month: JULY
 Last Annual Report Filed: 10/03/2022
 Year: 2022

AGENT/SERVICE OF PROCESS (SOP) INFORMATION

Agent: LUANNE PETERPAUL
 Agent/SOP Address: 15 RIVERGATE WAY ,LONG BRANCH,NJ,07740
 Address Status: DELIVERABLE
 Main Business Address: 601 Bangs Avenue, Ste 401, ASBURY PARK, NJ, 07712
 Principal Business Address: N/A

(New Jersey Department Of Treasury, Filed 7/9/16)

- **The Company Is Currently Active To Date.** (New Jersey Department Of Treasury, Accessed 8/2/23)

In April 2020, Peterpaul Law Received A Paycheck Protection Program Loan Of \$55,585 For Payroll, Citing Five Jobs. (PPP Loans, [ProPublica](#), Accessed 8/2/23)

PETERPAUL LAW LLP

[Why is my loan information here?](#)

Loan Amount \$55,585	Amount Forgiven \$56,104 <i>Includes any accrued interest</i>	Location Asbury Park, NJ Urban	Industry Offices of Lawyers	Date Approved April 29, 2020 (First Round)
Where applicants said the money will go		Lender	Jobs Reported	Business Type
Payroll	\$55,585	OceanFirst Bank, National Association	5	Limited Liability Partnership
Utilities	\$0			
Mortgage Interest	\$0			
Health Care	\$0	Business Age	Loan Status	
Rent	\$0	Existing or more than 2 years old	Forgiven	
Refinance EIDL	\$0			
Debt Interest	\$0			

(PPP Loans, [ProPublica](#), Accessed 8/2/23)

In February 2021, Peterpaul Law Received A Paycheck Protection Program Loan Of \$60,057 For Payroll, Citing Three Jobs. (PPP Loans, [ProPublica](#), Accessed 8/2/23)

PETERPAUL LAW LLP

[Why is my loan information here?](#)

Loan Amount \$60,057	Amount Forgiven \$60,710 <i>Includes any accrued interest</i>	Location Asbury Park, NJ Urban	Industry Offices of Lawyers	Date Approved Feb. 3, 2021 (Second Round)
Where applicants said the money will go		Lender	Jobs Reported	Business Type
Payroll	\$60,052	Northeast Bank	3	Limited Liability Partnership
Utilities	\$1			
Mortgage Interest	\$0			
Health Care	\$0	Business Age	Loan Status	
Rent	\$0	Existing or more than 2 years old	Forgiven	
Refinance EIDL	\$0			
Debt Interest	\$0			

(PPP Loans, [ProPublica](#), Accessed 8/2/23)

Garden State Equality, LLC

In January 2005, Peterpaul Incorporated Garden State Equality, LLC As A Domestic For-Profit Entity With The New Jersey Department Of Treasury. (New Jersey Department Of Treasury, Filed 1/21/05)

Status Report For: GARDEN STATE EQUALITY, L.L.C.
 Report Date: 8/2/2023
 Confirmation Number: 232143077167

IDENTIFICATION NUMBER, ENTITY TYPE AND STATUS INFORMATION

Business ID Number: 0600225048
 Business Type: DOMESTIC LIMITED LIABILITY COMPANY
 Status: TERMINATION/DISSOLUTION
 Original Filing Date: 01/21/2005
 Stock Amount: N/A
 Home Jurisdiction: NJ
 Status Change Date: 10-13-2015

REVOCAION/SUSPENSION INFORMATION

DOR Suspension Start Date: 08-16-2012
 DOR Suspension End Date: N/A
 Tax Suspension Start Date: N/A
 Tax Suspension End Date: N/A

ANNUAL REPORT INFORMATION

Annual Report Month: JANUARY
 Last Annual Report Filed: 10/13/2015
 Year: 2016

AGENT/SERVICE OF PROCESS (SOP) INFORMATION

Agent: LUANNE PETERPAUL
 Agent/SOP Address: 40 SOUTH FULLERTON AVENUE , MONTCLAIR, NJ, 07042
 Address Status: DELIVERABLE
 Main Business Address: 40 SOUTH FULLERTON AVENUE, MONTCLAIR, NJ, 07042
 Principal Business Address: 40 SOUTH FULLERTON AVENUE, MONTCLAIR, NJ, 07042

(New Jersey Department Of Treasury, Filed 1/21/05)

- **In October 2015, The Company Was Terminated.** (New Jersey Department Of Treasury, Filed 10/13/15)

One Cleveland Place Associates, LLC

In April 1998, Peterpaul's Dad, Anthony Peterpaul, Incorporated One Cleveland Place Associates, LLC As A Domestic For-Profit Entity With The New Jersey Department Of Treasury. (New Jersey Department Of Treasury, Filed 4/13/98)

Status Report For: ONE CLEVELAND PLACE ASSOCIATES, LLC
 Report Date: 8/2/2023
 Confirmation Number: 232143077167

IDENTIFICATION NUMBER, ENTITY TYPE AND STATUS INFORMATION

Business ID Number: 0600050237
 Business Type: DOMESTIC LIMITED LIABILITY COMPANY
 Status: TERMINATION/DISSOLUTION
 Original Filing Date: 04/13/1998
 Stock Amount: N/A
 Home Jurisdiction: NJ
 Status Change Date: NOT APPLICABLE

REVOCATION/SUSPENSION INFORMATION

DOR Suspension Start Date: N/A
 DOR Suspension End Date: N/A
 Tax Suspension Start Date: N/A
 Tax Suspension End Date: N/A

ANNUAL REPORT INFORMATION

Annual Report Month: APRIL
 Last Annual Report Filed: 11/15/2017
 Year: 2017

AGENT/SERVICE OF PROCESS (SOP) INFORMATION

Agent: ANTHONY J PETERPAUL ESQ
 Agent/SOP Address: ONE CLEVELAND PLACE ,SPRINGFIELD,NJ,07081
 Address Status: DELIVERABLE
 Main Business Address: ONE CLEVELAND PLACE, SPRINGFIELD, NJ, 07081
 Principal Business Address: ONE CLEVELAND PLACE,SPRINGFIELD,NJ,07081

(New Jersey Department Of Treasury, Filed 4/13/98)

- **The Company Was Terminated In November 2017.** (New Jersey Department Of Treasury, Filed 11/15/17)

Peterpaul Was Listed As A Member Of The Organization. (New Jersey Department Of Treasury, Filed 4/13/98)

Following are the most recently reported officers/directors (corporations), managers/members/managing members (LLCs), general partners (LPs), trustees/officers (non-profits).

Title: OTHER
 Name: PETERPAUL, LUANNE M
 Address: 15 RIVERGATE WAY, LONG BRANCH, , ,
 Title: OTHER
 Name: PETERPAUL, FRANK J
 Address: 301 WINDERMERE AVENUE, INTERLAKEN, , ,
 Title: OTHER
 Name: PETERPAUL, ANTHONY J
 Address: 65 DEBRA LANE, BASKING RIDGE, , ,

(New Jersey Department Of Treasury, Filed 4/13/98)

NON-PROFIT RECORDS

Luanne Peterpaul is a former member of three New Jersey-domiciled non-profits: A Broader View, Inc., Garden State Equality Action Fund, Inc., and the Thomas Peterpaul Foundation, Inc.

A Broader View, Inc.

In August 2005, Peterpaul Incorporated A Broader View, Inc. As A Domestic Non-Profit With The New Jersey Department Of Treasury. (New Jersey Department Of Treasury, Filed 8/10/05)

Status Report For: A BROADER VIEW, INC.
 Report Date: 8/2/2023
 Confirmation Number: 232143077167

IDENTIFICATION NUMBER, ENTITY TYPE AND STATUS INFORMATION

Business ID Number: 0100950041
 Business Type: NON PROFIT CORPORATION
 Status: REVOKED FOR NOT FILING ANNUAL REPORT FOR 2 CONSECUTIVE YEARS
 Original Filing Date: 08/10/2005
 Stock Amount: N/A
 Home Jurisdiction: NJ
 Status Change Date: NOT APPLICABLE

REVOCATION/SUSPENSION INFORMATION

DOR Suspension Start Date: 03-16-2009
 DOR Suspension End Date: N/A
 Tax Suspension Start Date: N/A
 Tax Suspension End Date: N/A

ANNUAL REPORT INFORMATION

Annual Report Month: AUGUST
 Last Annual Report Filed: 08/07/2006
 Year: 2006

AGENT/SERVICE OF PROCESS (SOP) INFORMATION

Agent: LUANNE PETERPAUL, ESQ.
 Agent/SOP Address: ONE CLEVELAND PLACE ,SPRINGFIELD,NJ,07081
 Address Status: DELIVERABLE
 Main Business Address: 212 W. STATE ST., TRENTON, NJ, 08608
 Principal Business Address: 212 W STATE ST, TRENTON, NJ, 08608

(New Jersey Department Of Treasury, Filed 8/10/05)

- **In March 2009, The Non-Profit's Registration Was Revoked For Failing To File Its Annual Report For Two Consecutive Years.** (New Jersey Department Of Treasury, Filed 3/16/09)

Garden State Equality Action Fund, Inc.

In December 2007, Garden State Equality Action Fund, Inc. Was Incorporated As A Domestic Non-Profit With The New Jersey Department Of Treasury. (New Jersey Department Of Treasury, Filed 12/31/07)

Status Report For: GARDEN STATE EQUALITY ACTION FUND, INC
 Report Date: 8/2/2023
 Confirmation Number: 232143077167

IDENTIFICATION NUMBER, ENTITY TYPE AND STATUS INFORMATION

Business ID Number: 0100987776
 Business Type: NON PROFIT CORPORATION
 Status: REVOKED FOR NOT FILING ANNUAL REPORT FOR 2 CONSECUTIVE YEARS
 Original Filing Date: 12/31/2007
 Stock Amount: N/A
 Home Jurisdiction: NJ
 Status Change Date: 07-07-2017

REVOCATION/SUSPENSION INFORMATION

DOR Suspension Start Date: 07-16-2023
 DOR Suspension End Date: N/A
 Tax Suspension Start Date: N/A
 Tax Suspension End Date: N/A

ANNUAL REPORT INFORMATION

Annual Report Month: DECEMBER
 Last Annual Report Filed: 09/26/2017
 Year: 2017

AGENT/SERVICE OF PROCESS (SOP) INFORMATION

Agent: CHRISTIAN FUSCARINO
 Agent/SOP Address: 40 SOUTH FULLERTON AVE ,MONTCLAIR,NJ,07042
 Address Status: DELIVERABLE
 Main Business Address: 40 South Fullerton Ave, Montclair, NJ, 07042 3417

(New Jersey Department Of Treasury, Filed 12/31/07)

- **In July 2023, The Non-Profit’s Registration Was Revoked For Failing To File Its Annual Report For Two Consecutive Years.** (New Jersey Department Of Treasury, Filed 7/16/23)

Peterpaul Was Listed As A Director Of The Organization. (New Jersey Department Of Treasury, Filed 12/31/07)

Following are the most recently reported officers/directors (corporations), managers/members/managing members (LLCs), general partners (LPs), trustees/officers (non-profits).

Title: PRESIDENT
 Name: Fuscarino,Christian J
 Address: 40 South Fullerton Ave, Montclair, , , US
 Title: TREASURER
 Name: McIntyre,Steven
 Address: 40 South Fullerton Ave, Montclair, , , US
 Title: DIRECTORS
 Name: Peterpaul,Luanne
 Address: 40 South Fullerton Ave, Montclair, , , US

(New Jersey Department Of Treasury, Filed 12/31/07)

The Thomas Peterpaul Foundation, Inc.

In July 2009, Peterpaul's Father, Anthony, Incorporated The Thomas Peterpaul Foundation, Inc. As A Domestic Non-Profit With The New Jersey Department Of Treasury. (New Jersey Department Of Treasury, Filed 7/9/09)

Status Report For: THE THOMAS PETERPAUL FOUNDATION, INC., A NEW JERSEY NONPROFIT CORPORATION
 Report Date: 8/2/2023
 Confirmation Number: 232143077167

IDENTIFICATION NUMBER, ENTITY TYPE AND STATUS INFORMATION

Business ID Number: 0100932715
 Business Type: NON PROFIT CORPORATION
 Status: ACTIVE
 Original Filing Date: 09/15/2004
 Stock Amount: N/A
 Home Jurisdiction: NJ
 Status Change Date: 07-09-2009

REVOCATION/SUSPENSION INFORMATION

DOR Suspension Start Date: 04-16-2009
 DOR Suspension End Date: 07-09-2009
 Tax Suspension Start Date: N/A
 Tax Suspension End Date: N/A

ANNUAL REPORT INFORMATION

Annual Report Month: SEPTEMBER
 Last Annual Report Filed: 08/19/2021
 Year: 2021

AGENT/SERVICE OF PROCESS (SOP) INFORMATION

Agent: ANTHONY J PETERPAUL ESQ
 Agent/SOP Address: 301 WINDERMERE AVE , INTERLAKEN, NJ, 07712
 Address Status: DELIVERABLE
 Main Business Address: PO BOX 135, ALLENHURST, NJ, 07711
 Principal Business Address: PO BOX 135, ALLENHURST, NJ, 07711

(New Jersey Department Of Treasury, Filed 7/9/09)

- **The Non-Profit Is Currently Active.** (New Jersey Department Of Treasury, Accessed 8/3/23)

Peterpaul Served As A Member Of The Board Between 2013 And 2019. ([ProPublica](#), Accessed 8/3/23)

Person	Title	Organization Name	Fiscal Year	Org. City	Compensation From W-2 or 1099-MISC	Compensation From Related Orgs.
LUANNE M PETERPAUL E	TRUSTEE (TERMED 5/1/19)	MONMOUTH MEDICAL CENTER FOUNDATION INC	2019	LONG BRANCH, NJ	\$0	\$0
LUANNE PETERPAUL	BOARD MEMBER	THOMAS PETERPAUL FOUNDATION INC	2018	ALLENHURST, NJ	\$0	
LUANNE M PETERPAUL ESQ	TRUSTEE	MONMOUTH MEDICAL CENTER FOUNDATION INC	2018	LONG BRANCH, NJ	\$0	\$0
LUANNE PETERPAUL	BOARD MEMBER	THOMAS PETERPAUL FOUNDATION INC	2017	ALLENHURST, NJ	\$0	
Luanne Peterpaul	Board Member	GARDEN STATE EQUALITY EDUCATION FUND INC	2017	ASBURY PARK, NJ	\$0	\$0
LUANNE M PETERPAUL ESQ	TRUSTEE	MONMOUTH MEDICAL CENTER FOUNDATION INC	2017	LONG BRANCH, NJ	\$0	\$0
LUANNE PETERPAUL	BOARD MEMBER	THOMAS PETERPAUL FOUNDATION INC	2016	ALLENHURST, NJ	\$0	\$0
LUANNE PETERPAUL	BOARD MEMBER	THOMAS PETERPAUL FOUNDATION INC	2015	ALLENHURST, NJ	\$0	\$0
LUANNE M PETERPAUL ESQ	TRUSTEE	MONMOUTH MEDICAL CENTER FOUNDATION INC	2015	LONG BRANCH, NJ	\$0	\$0
LUANNE PETERPAUL	BOARD MEMBER	THOMAS PETERPAUL FOUNDATION INC	2014	ALLENHURST, NJ	\$0	\$0
LUANNE M PETERPAUL ESQ	TRUSTEE	MONMOUTH MEDICAL CENTER FOUNDATION INC	2014	LONG BRANCH, NJ	\$0	\$0
LUANNE PETERPAUL	PRESIDENT	GARDEN STATE EQUALITY ACTION FUND INC	2013	ASBURY PARK, NJ	\$0	\$0
LUANNE M PETERPAUL ESQ	TRUSTEE	MONMOUTH MEDICAL CENTER FOUNDATION INC	2013	LONG BRANCH, NJ	\$0	\$0

(ProPublica, Accessed 8/3/23)

PROFESSIONAL & RECREATIONAL LICENSES

Luanne Peterpaul has been a licensed attorney in the state of New Jersey since December 15, 1983.

Attorney License

New Jersey

Peterpaul Has Been A Licensed Attorney In The State Of New Jersey Since December 15, 1983. ([New Jersey Courts](#), Accessed 8/2/23)

ATTORNEY DETAIL

Attorney Name	LUANNE M PETERPAUL
NJ Attorney ID	029761983
Bar Admission Date ⓘ	12/15/1983
Employer City	ASBURY PARK
Employer State	NJ
Employer County	MONMOUTH
Employer Phone	(732) 455-8080
Good Standing Status ⓘ	ACTIVE
Current Certificate of Insurance	NO ⓘ

([New Jersey Courts](#), Accessed 8/2/23)

PERSONAL FINANCIAL DISCLOSURE

NOTE: Luanne Peterpaul has not yet filed a personal financial disclosure.

PETERPAUL'S QUESTIONABLE ATTORNEY RECORD

An analysis of Luanne Peterpaul's record as an attorney has revealed numerous instances of questionable clients she has chosen to represent, ranging from severe criminal charges, to charges of discrimination and other employment charges, to fighting against unions.

Early in her career, Peterpaul appears to have worked as a criminal defense attorney. Peterpaul represented clients charged with serious offenses like bank fraud, intimidating witnesses, and firearm-related crimes. Others may raise questions about her serious on gun control issues given she routinely received reduced sentences through plea agreements. Additionally, Peterpaul has represented individuals and corporations who faced legal action over allegations of discrimination, harassment, and other employment-related issues. Specifically, Peterpaul regularly represented corporations against allegations they discrimination against employees on the basis of race and gender, withheld pay, and had employees who were sexually harassed. Interestingly, Peterpaul boasts about her experience as a labor relations attorney, despite the fact that she has frequently served as counsel for corporations. To that effect, Peterpaul has worked as an attorney for corporations who fought against unions on issues related to pensions and collective bargaining agreements. Ironically, Peterpaul is quoted saying she "built her career taking on tough fights and standing up against bullies," yet, in most lawsuits, Peterpaul appears to have been legal counsel for the corporations and "bullies." Likewise, despite her past work fighting against unions, Peterpaul has received thousands of dollars from unions thus far for her campaign.

AS AN ATTORNEY, PETERPAUL HAS REPRESENTED INDIVIDUALS CHARGED WITH OFFENSES INCLUDING THREATENING WITNESSES, BANK FRAUD, AND ILLEGALLY TRANSPORTS FIREARMS

In July 1996, Peterpaul Represented Rubin Diaz, Who Was Charged With Conspiracy To Defraud The United States – Bank Fraud

In July 1996, Rubin Diaz Was Charged With Conspiracy To Defraud The United States – Bank Fraud. (Case No. 96-CR-00396-JAP-1, USA V. Rubin Diaz, U.S. District Court District Of New Jersey, Filed 7/16/96)

Assigned to: Judge Joel A. Pisano

Defendant (1)

RUBIN DIAZ
 TERMINATED: 11/03/1997

represented by **K. ANTHONY THOMAS**
 OFFICE OF THE FEDERAL PUBLIC DEFENDER
 1002 BROAD STREET
 NEWARK, NJ 07102
 (973) 645-6347
 Email: anthony_thomas@fd.org
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
 Designation: Public Defender or Community Defender Appointment

LUANNE M. PETERPAUL
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaul.com
 TERMINATED: 11/03/1997
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
 Designation: CJA Appointment

Pending Counts

18:371.F CONSPIRACY TO DEFRAUD THE UNITED STATES - BANK FRAUD
 (18:1344(1))
 (1)

Disposition

AMENDED JUDGMENT 5 yrs prob w/conds., 8 mths home confinement, Restitution to DST Systems Inc. = \$5,570.00, S.A.\$50.00

(Case No. 96-CR-00396-JAP-1, *USA V. Rubin Diaz*, U.S. District Court District Of New Jersey, Filed 7/16/96)

- **Peterpaul Was Listed As A Lead Attorney Representing Diaz.** (Case No. 96-CR-00396-JAP-1, *USA V. Rubin Diaz*, U.S. District Court District Of New Jersey, Filed 7/16/96)

In November 1997, As Part Of A Plea Agreement, Diaz Was Sentenced To 1.5 Years Of Probations With Eight Months Of Home Confinement And Was Ordered To Pay \$5,570 In Restitution To DST Systems. (Case No. 96-CR-00396-JAP-1, *USA V. Rubin Diaz*, U.S. District Court District Of New Jersey, Filed 11/3/97)

07/15/1996	19	Plea Agreement as to RUBIN DIAZ (mgr) (Entered: 08/01/1996)
07/18/1996	20	ORDER that deft submit to substance abuse testing & treatment as deemed necessary by PTS. as to RUBIN DIAZ (Signed by Judge Harold A. Ackerman) (mgr) (Entered: 08/01/1996)
08/05/1996	21	TRANSCRIPT filed as to RUBIN DIAZ for dates of 7/15/96 Plea. (jn) (Entered: 08/07/1996)
08/22/1997	22	ORDER as to RUBIN DIAZ, Modifying Conditions of Release , allowing defendant to Travel to the State of Pennsylvania, from 8/24/97 to 8/28/97. Order mailed. (Signed by Judge Harold A. Ackerman) (jn) (Entered: 08/25/1997)
10/23/1997	23	Minutes of 10/23/97 before Judge Harold A. Ackerman as to RUBIN DIAZ, Objections to the PSI Report. Sentencing held. RUBIN DIAZ (1) count(s) 1 (Court Reporter/ESR: P.Lewis) (mgr) (Entered: 11/03/1997)
11/03/1997	24	JUDGMENT RUBIN DIAZ (1) count(s) 1. 5 yrs prob w/conds., 8 mths home confinement, Restitution to DST Systems Inc. = \$5,570.00, S.A.\$50.00 (signed by Judge Harold A. Ackerman)(nm) (mgr) (Entered: 11/03/1997)

(Case No. 96-CR-00396-JAP-1, *USA V. Rubin Diaz*, U.S. District Court District Of New Jersey, Filed 11/3/97)

In January 1998, Peterpaul Represented Zhu-En Dong, Who Was Charged With Interference With Commerce By Threat Or Violence

In January 1998, Zhu-En Dong Was Charged With Interference With Commerce By Threat Or Violence. (Case No. 98-CR-00048-MTB-1, *USA V. Zhu-En Dong*, U.S. District Court District Of New Jersey, Filed 1/26/98)

Case title: USA v. DONG
 Magistrate judge case number: 2:97-mj-08006

Date Filed: 01/26/1998
 Date Terminated: 05/27/1998

Assigned to: Judge Maryanne Trump Barry

Defendant (1)

ZHU-EN DONG
 TERMINATED: 05/28/1998

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaulaw.com
 TERMINATED: 05/28/1998
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED
 Designation: CJA Appointment

Pending Counts

18:1951.F INTERFERENCE WITH COMMERCE BY THREAT OR VIOLENCE (dof
 11/96)
 (1)

Disposition

48 mths impr., 3 yrs super release, S.A.\$100.00

(Case No. 98-CR-00048-MTB-1, *USA V. Zhu-En Dong*, U.S. District Court District Of New Jersey, Filed 1/26/98)

- **Peterpaul Was Listed As The Lead Attorney Representing Dong.** (Case No. 98-CR-00048-MTB-1, *USA V. Zhu-En Dong*, U.S. District Court District Of New Jersey, Filed 1/26/98)

In May 1998, As Part Of A Plea Agreement, Dong Was Sentenced To 48 Months In Prison Followed By Three Years Of Supervised Release. (Case No. 98-CR-00048-MTB-1, *USA V. Zhu-En Dong*, U.S. District Court District Of New Jersey, Filed 5/27/98)

01/26/1998		PLEA of Guilty: ZHU-EN DONG (1) count(s) 1 , Sentencing for 11:00 4/27/98 for ZHU-EN DONG ; ; Court accepts plea. (mgr) (Entered: 01/28/1998)
01/26/1998	17	Rule 11 APPLICATION by ZHU-EN DONG (mgr) (Entered: 01/28/1998)
01/26/1998	18	Plea Agreement as to ZHU-EN DONG (mgr) (Entered: 01/28/1998)
01/26/1998	19	NOTICE OF ALLOCATION AND ASSIGNMENT Newark (before Judge Maryanne T. Barry) (mgr) (Entered: 01/28/1998)
04/17/1998	20	PETITION by USA & ORDER for Writ of Habeas Corpus as to ZHU-EN DONG, ARDC, Riker's Island, East Elmhurst, NY, ret. 4-23-98 U.S.Probation Office, Newark, NJ, in connection with is sentencing. (it) (Entered: 04/17/1998)
05/06/1998	21	Petition & ORDER as to ZHU-EN DONG, for writ of habeas corpus ret 5/27/98 @9:30am. (Signed by Judge Maryanne T. Barry) (mgr) (Entered: 05/18/1998)
05/06/1998		WRIT of Habeas Corpus issued as to ZHU-EN DONG for 5/27/98 @ 9:30am. (mgr) (Entered: 05/18/1998)
05/27/1998	22	Minutes of 5/27/98 before Judge Maryanne T. Barry as to ZHU-EN DONG, 5K mtn by govt Granted. Sentencing held. ZHU-EN DONG (1) count(s) 1 Ordered deft Remanded. (Court Reporter/ESR: J.Stone) (mgr) (Entered: 05/28/1998)
05/27/1998	24	SEALED DOCUMENT as to ZHU-EN DONG (it) (ys,). (Entered: 05/28/1998)
05/28/1998	23	JUDGMENT ZHU-EN DONG (1) count(s) 1. 48 mths impr., 3 yrs super release, S.A.\$100.00 (signed by Judge Maryanne T. Barry) (nm) party ZHU-EN DONG (mgr) (Entered: 05/28/1998)

(Case No. 98-CR-00048-MTB-1, *USA V. Zhu-En Dong*, U.S. District Court District Of New Jersey, Filed 5/27/98)

In June 1998, Peterpaul Represented Ronnie Seamon, Who Was Charged With Conspiracy To Defraud The United States – Interstate Transport Of Firearms Without A Dealer’s License

In June 1998, Ronnie Seamon Was Charged With Conspiracy To Defraud The United States – Interstate Transport Of Firearms Without A Dealer’s License. (Case No. 98-CR-00357-JWB-4, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 6/5/98)

Assigned to: Judge John W. Bissell
 Appeals court case number: 99-5987

Defendant (4)
RONNIE SEAMON
 TERMINATED: 10/12/1999

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaulaw.com
 TERMINATED: 10/12/1999
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED
 Designation: Retained

Pending Counts
 None

Disposition

Highest Offense Level (Opening)
 None

Disposition

Terminated Counts
 18:371 CONSPIRACY TO DEFRAUD THE UNITED STATES - Interstate Transport of
 Firearms w/o Dealers License (18:922(a)(1)(A)) (dof 10/95 thru 2/98)
 (1)

Impr. 60mos. Supervised Release 3yrs.

(Case No. 98-CR-00357-JWB-4, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 6/5/98)

- **Peterpaul Was Listed As The Lead Attorney Representing Seamon.** (Case No. 98-CR-00357-JWB-4, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 6/5/98)

In October 1999, As Part Of A Plea Agreement, Seamon Was Sentenced To 60 Months In Prison Followed By Three Years Of Supervised Release. (Case No. 98-CR-00357-JWB-4, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 10/12/99)

10/12/1999	85	JUDGMENT RONNIE SEAMON (4) count(s) 1 of Indictment. Impr. 60mos. Supervised Release 3yrs. Spec. conditions: 1. deft. refrain from the illegal possession and/or use of drugs, etc. Spec. Assessment \$100. Ordered deft. remanded. (signed by Judge John W. Bissell) party RONNIE SEAMON (it) (Entered: 10/14/1999)
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(Case No. 98-CR-00357-JWB-4, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 10/12/99)

In September 1998, Peterpaul Represented Seamon, Who Was Charged With Conspiracy To Defraud The United States-Retaliation, Witness Tampering, Retaliating Against A Witness, And Intimidation Or Force Against A Witness

In September 1998, Seamon Was Charged With Conspiracy To Defraud The United States-Retaliation, Witness Tampering, Retaliating Against A Witness, And Intimidation Or Force Against A Witness. (Case No. 98-CR-00567-JWB-8, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 9/21/98)

Assigned to: Judge John W. Bissell

Defendant (8)

RONNIE SEAMON
TERMINATED: 10/12/1999

represented by **LUANNE M. PETERPAUL**
PETERPAUL LAW LLP
700 Bangs Ave
Suite 2
Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaulaw.com
TERMINATED: 10/12/1999
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
Designation: CJA Appointment

JOSEPH D. ROTELLA
24 COMMERCE STREET
SUITE 1726
NEWARK, NJ 07102
(973) 621-0333
Fax: 973-621-0080
Email: rotellaesq@aol.com
TERMINATED: 10/12/1999
ATTORNEY TO BE NOTICED
Designation: CJA Appointment

Pending Counts

None

Disposition

Highest Offense Level (Opening)

None

Terminated Counts

18:371 CONSPIRACY TO DEFRAUD THE UNITED STATES - Retaliation (18:1513(b)
(2)) (dof 05/98 thru 09/98)
(1)
18:371 CONSPIRACY TO DEFRAUD THE UNITED STATES - Retaliation (18:1513(b)
(2)&2 - Witness Tampering (18:1512(b)&2 (dof 08/98 thru 11/98)
(1s)
18:1513(b)(2)&2 RETALIATING AGAINST WITNESS
(2s)
18:1512(b)&2 INTIMIDATION OR FORCE AGAINST WITNESS
(3s)
18:1513(b)(2)&2 RETALIATING AGAINST WITNESS, VICTIM
(5)

Disposition

Superseded.
Dismissed.
Dismissed.
Dismissed.
Superseded.

(Case No. 98-CR-00567-JWB-8, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 9/21/98)

- **Peterpaul Was Listed As A Lead Attorney Representing Seamon.** (Case No. 98-CR-00567-JWB-8, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 9/21/98)

In October 1999, As Part Of A Plea Agreement, The Charges Were Either Dismissed Or Suspended. (Case No. 98-CR-00567-JWB-8, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 10/12/99)

07/19/1999	183	Notice of MOTION by RONNIE SEAMON I. For order granting specific performance of the Plea Agreement entered on 8/18/98, more specifically: a. Dismissal of the retaliation indictment; b. Granting of a 5K1.1 motion; c. Withholding opposition to request of probation. . 2. For order to allow the defendant to Withdraw Plea of Guilty in the alternative. . 3. For order granting defendant's request for evidentiary Hearing. . 4. For order for Disclosure of all Grand Jury Transcripts . 5. For order for Bill of Particulars. . 6.For order for Disclosure of material under standard discovery order. . 7.For order for leave to file additional motions that might be appropriate after discovery. . 8. For order for Hearing to determine the nature .if any, of the government's evidence of crimes and wrongful acts not covered in the indictment. . 9. For order to compel under Rule 16, Brady, compelling the government to disclose any and all exculpatory and or favorable information under their control. . 10. For order to compel the government to retain and preserve all "rough notes" . 11. For order for early Disclosure of "Jenck's Act" material . 12. For order to compel the government to produce, in advance of trial, a list of witnesses to be called by the government. . 13. For order to suppress, barring, the introduction of co-conspiratory statements and for a preliminary pretrial in limine hearing todetermine the question of admissibility. . Motion Hearing set for 0:00 8/16/99 or as soon as motion may be heard as to: RONNIE SEAMON, re: (183-1), (183-2), (183-3), (183-4), (183-5), (183-6), (183-7), (183-8), (183-9), (183-10), (183-11), (183-12), (183-13) (Brief and PO subm) (jn) (Entered: 07/20/1999)
08/16/1999	186	Minutes of 8/16/99 before Judge John W. Bissell as to RONNIE SEAMON denying [183-2] motion 2. For order to allow the defendant to Withdraw Plea of Guilty in the alternative. as to RONNIE SEAMON (8)granting [183-3] motion 3. For order granting defendant's request for evidentiary Hearing. as to RONNIE SEAMON (8) Court determined Luanne Peterpaul, Esq. may be a witness and ordered new counsel apointed to represent the deft. for the hearing. (Court Reporter/ESR: IR) (it) (Entered: 08/24/1999)
08/24/1999	189	Minutes of 8/24/99 before Judge John W. Bissell as to RONNIE SEAMON, Order for appointment of co-counse Joseph Rotella, Esq. I. . set evidentiary hearing for 1:30 9/7/99 for RONNIE SEAMON. Ordered briefs on general vs. limited waiver to be submitted by 10:00 a.m. on 9/7/99. (Court Reporter/ESR: Ira Rubenstein) (jn) (Entered: 08/27/1999)
08/24/1999	194	CJA 20 as to RONNIE SEAMON : Appointment of Attorney Joseph Rotella, Esq. (Signed by Judge John W. Bissell) (it) (Entered: 09/14/1999)
09/08/1999	193	Minutes of 9/8/99 before Judge John W. Bissell as to RONNIE SEAMON. At call for Evidentiary hearing . Counsel reported the disposition in the case. Deft. to consent to a 2 point enhancement for obstruction of justice in Cr. 98-357-04; govt. to dismiss Cr. 98-576-08 against the deft; deft. to withdraw motions in Cr. 98-576-08; deft. may seek adjustments in guidelines in Cr. 98-357-04. Deft. sworn and accepted terms. Ordered Oct. 1, 1999 at 2 p.m. fixed as sentencing date in Cr. 98-357-04. Ordered deft. remanded. (Court Reporter/ESR: JS) (it) (Entered: 09/13/1999)
10/12/1999	196	ORDER FOR DISMISSAL of Indictment as to RONNIE SEAMON (Signed by Judge John W. Bissell) (it) (Entered: 10/13/1999)

(Case No. 98-CR-00567-JWB-8, *USA V. Ronnie Seamon*, U.S. District Court District Of New Jersey, Filed 10/12/99)

In March 1996, Peterpaul Represented Gordon Koehler, Jr., Who Was Charged With Fraud And False Statements

In March 1996, Gordon Koehler, Jr. Was Charged With Fraud And False Statements. (Case No. 96-CR-00180-JHR-1, *USA V. Gordon Koehler, Jr.*, U.S. District Court District Of New Jersey, Filed 3/29/96)

Assigned to: Judge Joseph H. Rodriguez

Defendant (1)
GORDON T. KOEHLER, JR.
 TERMINATED: 10/07/1996

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bungs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: lunne@peterpaulaw.com
 TERMINATED: 10/07/1996
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
 Designation: Retained

Pending Counts
 26:7206A.F FRAUD AND FALSE STATEMENTS
 (3)

Highest Offense Level (Opening)
 Felony

Terminated Counts
 26:7206A.F FRAUD AND FALSE STATEMENTS
 (1-2)

Disposition
 PROBATION - 60 MOS. with 6 Mos. home confinement; SPEICAL ASSESSMENT OF \$50.00

Disposition
 CTS. 1 AND 2 DISMISSED ON APPLICATION OF THE GOVERNMENT

(Case No. 96-CR-00180-JHR-1, *USA V. Gordon Koehler, Jr.*, U.S. District Court District Of New Jersey, Filed 3/29/96)

- **Peterpaul Was Listed As The Lead Attorney Representing Koehler.** (Case No. 96-CR-00180-JHR-1, *USA V. Gordon Koehler, Jr.*, U.S. District Court District Of New Jersey, Filed 3/29/96)

In October 1996, As Part Of A Plea Agreement, Koehler Was Sentenced To 60 Months Of Probations With Six Months Of Home Confinement. (Case No. 96-CR-00180-JHR-1, *USA V. Gordon Koehler, Jr.*, U.S. District Court District Of New Jersey, Filed 10/7/96)

03/29/1996	6	Plea Agreement as to GORDON T. KOEHLER, JR. (ln) Modified on 04/01/1996 (Entered: 03/29/1996)
03/29/1996	7	ORDER of Release as to GORDON T. KOEHLER, JR. (Signed by Judge Joseph H. Rodriguez) (ln) Modified on 04/01/1996 (Entered: 03/29/1996)
03/29/1996		BAIL/BOND executed by GORDON T. KOEHLER, JR. in Amount \$ 1,000.00/OR (ln) Modified on 04/01/1996 (Entered: 03/29/1996)
03/29/1996	8	NOTICE OF ALLOCATION AND ASSIGNMENT Camden (before Judge Joseph H. Rodriguez) (ln) Modified on 04/01/1996 (Entered: 03/29/1996)
10/04/1996	9	Minutes of 10/4/96 before Judge Joseph H. Rodriguez as to GORDON T. KOEHLER JR., Sentencing held. GORDON T. KOEHLER (1) count(s) 3 , and appl. of the Govt to dismiss cts. 1 & 2 of the three count information - granted; bail continued (Court Reporter/ESR: CARL NAMI, JR.) (dt) (Entered: 10/08/1996)
10/07/1996	10	JUDGMENT entered as to GORDEON KOEHLER: PROBATION - 60 MOS. with 6 Mos. home confinement; SPEICAL ASSESSMENT OF \$50.00 , and CTS. 1 AND 2 DISMISSED ON APPLICATION OF THE GOVERNMENT (signed by Judge Joseph H. Rodriguez) (dt) (Entered: 10/08/1996)

(Case No. 96-CR-00180-JHR-1, *USA V. Gordon Koehler, Jr.*, U.S. District Court District Of New Jersey, Filed 10/7/96)

AS AN ATTORNEY, PETERPAUL HAS REPRESENTED INDIVIDUALS AND CORPORATIONS CHARGED DISCRIMINATION, HARASSMENT, AND OTHER EMPLOYMENT-RELATED ISSUES

In December 2007, Anthony Jackson Filed An Employment Discrimination Complaint Against Union College, Who Was Represented By Peterpaul

In December 2007, Anthony Jackson Filed An Employment Discrimination Complaint Against Union College. (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

<p style="text-align: center;">ANTHONY D. JACKSON, Plaintiff, v. UNION COUNTY COLLEGE, Defendant.</p>	<p>Civil Action No. _____ JURY DEMAND</p>
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COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Anthony D. Jackson, by the undersigned attorneys, makes the following averments:

1. Plaintiff Anthony D. Jackson ("Jackson") resides at 151 Pemberton Avenue,

Plainfield, New Jersey 07018, within the jurisdiction of this Court. Defendant Union County College ("UCC") maintains its principal place of business at 1033 Springfield Avenue, Cranford, New Jersey 07016, within the jurisdiction of this Court.

2. This is a civil action brought pursuant to the Uniformed Services Employment and Reemployment Rights Act of 1994, 38 U.S.C. §§ 4301 - 4333 ("USERRA").
3. Defendant UCC is an employer within the meaning of 38 U.S.C. § 4303(4).

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College*, U.S. District Court District Of New Jersey, Filed 12/14/07)

- **Peterpaul Was Listed As The Lead Attorney Representing Union County College.** (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College*, U.S. District Court District Of New Jersey, Filed 12/14/07)

v.

Defendant

UNION COUNTY COLLEGE

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaul.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College*, U.S. District Court District Of New Jersey, Filed 12/14/07)

The Plaintiff Stated He Served In The U.S. Naval Reserve While Working At Union County College. (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College*, U.S. District Court District Of New Jersey, Filed 12/14/07)

6. Jackson joined the United States Naval Reserve ("USNR") in 1992, and served in the USNR from 1992 to 2000. In 2000, Jackson transferred to the United States Air Force Reserve ("USAFR"), where he served from 2000 to 2002. In 2002, Jackson transferred to the USNR.

7. In 1994, Jackson began working for UCC as a Parking Lot Attendant. In 1995, Jackson applied for and received the position of Permanent Part-Time Security Officer, where he worked Saturday and Sunday nights.

8. In 1998, UCC appointed William Alder ("Alder") to serve as its Director of Public Safety.

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College*, U.S. District Court District Of New Jersey, Filed 12/14/07)

- **Despite Notifying Union County College He Was Ordered To Report For Duty And Having His Superior Calls, Along With Providing Evidence Of His Service, The**

College Suspended Him Without Pay. (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

9. On or about June 11, 2001, Jackson sent a memorandum to Alder, notifying Alder that Jackson had been ordered to report for training at Sheppard Air Force Base. Jackson enclosed a copy of his official orders with this memorandum, along with a letter from his unit stating that Jackson was required to attend the training. The memorandum and accompanying documents were also provided to Ralph Velez ("Velez"), Associate Director of Public Safety for UCC; and Keith Troutman ("Troutman"), Patrol Supervisor for UCC, and Jackson's immediate supervisor.

10. On or about June 18, 2001, Jackson reported for training at Sheppard Air Force Base. Jackson returned from training on or about August 12, 2001.

11. On or about August 14, 2001, Jackson spoke with Alder by telephone. Alder informed Jackson that Jackson would be suspended for two days without pay for reporting late to work on June 10, 2001.

12. Jackson was suspended without pay on August 18-19, 2001, and returned to work on August 25, 2001.

13. On or about August 15, 2001, while Jackson was speaking with him, Alder requested that Jackson provide him with a schedule listing Jackson's USAFR duty dates until the end of his enlistment. At the time of this request, six years remained of Jackson's service obligation. Jackson informed Alder that he could not comply with Alder's request because the USAFR only provided him with schedules listing his duty dates for the coming year.

14. On or about August 15, 2001, Alder sent a letter to Jackson. In the letter, Alder directed Jackson to provide Alder with a copy of the written procedure that applied to Jackson's USAFR scheduling obligation within thirty days. Alder directed that the procedure specify the

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

- **The Plaintiff Was Eventually Discharged From His Position At The College While On Active Duty For The Military.** (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

19. Jackson reported for active military duty on October 23, 2001.
20. On or about November 6, 2001, UCC discharged Jackson from his position at UCC, while Jackson was on active military duty.
21. In a letter dated November 6, 2001, Charles Buda ("Buda"), Director of Human Resources for UCC, stated that Jackson had failed to respond to Alder's request for a copy of the "written procedure" applying to Jackson's USAFR "scheduling obligation." Buda also stated that Jackson had not communicated with UCC following his suspension.
22. On or about August 17, 2002, Jackson returned from active military duty.
23. On or about August 26, 2002, Jackson telephoned UCC and spoke with Rosemary Mraz ("Mraz"), an employee in UCC's Human Resources Department. Jackson told Mraz that he was a returning veteran, and that he was ready to return to work. Mraz informed Jackson that he had been terminated in November 2001. Mraz read Jackson a memorandum from Jackson's file stating that Jackson was terminated because he had not responded to a request for orders from his USAFR unit.
24. UCC violated § 4311 of USERRA, among other ways, by suspending Jackson in October 2001, discharging him in November 2001, and failing promptly to reemploy Jackson upon his return from active military duty in August 2002, because of his membership in, or obligation to perform service in, the uniformed services.
25. UCC violated § 4316 of USERRA by, among other ways, discharging Jackson without cause in November 2001.
26. UCC's violations of USERRA were willful.

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 12/14/07)

In February 2009, The Parties Agreed To Settle, With Jackson Receiving \$40,000 From Union County College, And The Case Was Dismissed. (Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College* , U.S. District Court District Of New Jersey, Filed 2/4/09)

CONSENT DECREE

This matter is before the Court for entry of this decree by consent of the parties to effectuate a compromise and settlement of all claims. After review and consideration, the Court believes that entry of this decree is in the interest of justice.

1. Plaintiff, Anthony D. Jackson ("Jackson"), commenced the above entitled action in the United States District Court for the District of New Jersey, alleging that the Defendant Union County College ("UCC") violated the Uniformed Services Employment and Reemployment Rights Act of 1994 ("USERRA") by (a) suspending Jackson in October 2001; (b) discharging Jackson on November 6, 2001, while Jackson was on active military duty; and (c) failing and refusing to allow Jackson to be re-employed in the position of employment at UCC in which Jackson would have been employed if the continuous employment of Jackson had not been interrupted by Jackson's military service from October 23, 2001 to August 17, 2002.

2. UCC denies each and every allegation of violation of USERRA made against it by Jackson in this lawsuit.

REMEDIAL REQUIREMENTS

9. Without admitting the allegations as set forth in the Complaint, and in settlement of the claims of Jackson, UCC shall, within thirty (30) days from the date of entry of this Decree, pay Jackson Forty Thousand and No/100 Dollars (\$40,000.00), from any available source whether UCC funds or third party sources, to satisfy all of his claims for relief, monetary and non-monetary, legal and equitable, which includes his attorney's fees and costs. Jackson will assume any tax liability associated with the sums paid to him by UCC as a result of this Decree. UCC shall pay the required amount by mailing to Jackson a check addressed as follows:

Anthony Jackson
1713 Lake Chapman Drive, Apt #102
Brandon, Florida 33510

(Case No. 07-CV-05962-WJM-MF, *Anthony Jackson V. Union County College*, U.S. District Court District Of New Jersey, Filed 2/4/09)

In December 2020, Earnest Polite Filed An Employment Discrimination Complaint Against Northwest Essex Community Healthcare, Inc. And Cheryl Miller, Who Were Represented By Peterpaul, Alleging He Was Discriminated Against Because Of His Race And Sex (Black Male), And Was Retaliated Against

In December 2020, Earnest Polite Filed An Employment Discrimination Complaint Against Northwest Essex Community Healthcare, Inc. And Cheryl Miller, Alleging He Was Discriminated Against Because Of His Race And Sex (Black Male), And Was Retaliated Against. (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc., Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

2. Plaintiff brings this action against the Northwest Essex Community Healthcare Network (NECHN) and Cheryl Miller, R.N. to remedy defendant's discrimination against him on account of his race (black), sex (male) and in retaliation for reporting wrongful conduct by the employees of the defendant in the following particulars:
 - a. Violated the New Jersey Law Against Discrimination (NJLAD) N.J. Stat. Ann. Section 10:5-1 in discriminating against plaintiff on account of his, race (black), sex (male) and by retaliating against him for reporting improper conduct by the employees of the defendant NECHN and by terminating him from employment;
 - b. Further violated the NJLAD allowing and perpetuating a hostile work environment based on race (black) and sex (male) and committing retaliation against plaintiff;
 - c. Violated Title VII of the Civil rights Act of 1964, as amended (Title VII) in discriminating against him on account of his race (black) and sex (male) and by retaliating against plaintiff by terminating the plaintiff from his employment with the defendant NECHN.
 - d. Plaintiff was discriminated against by his employer because of his race (black) and or sex (male) and or by way of retaliation. But for his race (black) and sex (male), he would not have been terminated from his employment
 - e. Defendants intentionally inflicted mental distress on the plaintiff and assaulted him.

PARTIES

3. Plaintiff Ernest Polite is a 68-year-old black male resident of the United States of America y residing at 18 Marshall Street, apartment 5Q, Irvington, New Jersey 07111.
4. North West Essex Behavior Health Network is a corporation of the State of New Jersey, doing business at 570 Belleville Ave. Belle Ville, New Jersey 07109.
5. Cheryl Miller is a registered nurse employed by the defendant NECHN and is a resident of the State of New Jersey.

(Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

- **Peterpaul Was Listed As The Lead Attorney Representing The Defendants.** (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

The Plaintiff Claimed That He Was Sexually Harassed By Miller Including “Attempting To Kiss The Plaintiff And Touching The Plaintiff Inappropriately.” (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

7. The plaintiff is a black male 68 years old who was hired in March 2018 as a temporary employee by NECHN, which provides psycho therapeutic services, substances abuse services and other related services.
8. From April 2018 up to and including November 2019, the plaintiff was subject to sexual harassment. The plaintiff was harassed by co-employee Cheryl Miller the defendant by attempting to kiss the plaintiff and touching the plaintiff inappropriately.
9. Plaintiff's co-employee Cheryl Miller also would stalk the plaintiff while he was on the job both within and or outside her scope of employment.
10. The inappropriate acts of Cheryl Miller and her assault on plaintiff were reported by the plaintiff to his supervisor Harold Schuman, who took no action.
11. After being subject to continuous acts of sexual harassment, the plaintiff filed a complaint with Human Resources concerning an incident which occurred on or about November 29, 2018 at approximately 10:15 A.M.
12. At the time of the November 29, 2018 incident, co-employee Cheryl Miller acting within and or outside the scope of her employment forcibly grabbed the face of the plaintiff with both hands to face forward in an attempt to kiss him.
13. Cheryl Miller admitted to such inappropriate conduct in a statement dated March 3, 2018.
14. At various times within and or outside the scope of her employment Cheryl Miller interfered with plaintiff in the performance of his duties, putting clients at risk in retaliation against him for spurning her sexual advances.
15. At various times within and or outside her scope of employment Ms. Miller has made false statements against plaintiff to clients and other staff members in retaliation for spurning her sexual advances to injure him and get him fired from his job.
16. On or about December 14, 2019, the plaintiff complained about the actions of Ms. Miller to his supervisor Howard Schulman, who failed to take any action against Cheryl Miller for her illegal and wrongful conduct.

(Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

- **The Plaintiff Reported The Inappropriate Behavior To His Supervisor, Who Took No Action; The Plaintiff Eventually Filed A Complaint With Human Resources, To Which Miller Admitted To The Accusations.** (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)
- **The Plaintiff Further Claimed Miller Had Made “False Statements Against The Plaintiff To Clients And Other Staff Members In Retaliation For Spurning Her Sexual Advances To Injure Him And Get Him Fired.”** (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

The Plaintiff Stated That Miller “Was Also Frequently Intoxicated Or Under The Influence Of Drugs Or Alcohol At Work And Had A Substance Abuse Problem Which NECHN Was Aware Of And Did Nothing About.” (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

17. Cheryl Miller within and or outside the scope of employment was also frequently intoxicated or under the influence of drugs and alcohol at work and had a substance abuse problem which NECHN was aware of and did nothing about.

18. The substance abuse problem of Cheryl Miller was so bad that she had her nursing license suspended in 2012.

19. Instead of addressing the complaints of the plaintiff, the plaintiff was wrongfully dismissed shortly after making his complaint against Ms. Miller for purportedly failing to provide proper documentation. This claim was a pretext to attempt to justify the wrongful dismissal of the plaintiff.

(Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

- **Instead Of Addressing The Complaints, The Plaintiff Was Wrongfully Dismissed Shortly After Making His Complaint.** (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 12/30/20)

In April 2021, The Complaint Was Dismissed Without Prejudice After The Parties Most Likely Agreed To Settle. (Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 4/14/21)

<p>ERNEST POLITE,</p> <p style="text-align: center;"><i>Plaintiffs,</i></p> <p style="text-align: center;">v.</p> <p>NORTHWEST ESSEX COMMUNITY HEALTHCARE NETWORK, INC., and CHERYL MILLER,</p> <p style="text-align: center;"><i>Defendants.</i></p>

Civil Action No. 20-20579
(JMV) (MF)

ORDER

John Michael Vazquez, U.S.D.J.

This matter comes before the Court by way of Defendants’ removal on December 30, 2020, D.E. 1. And it

APPEARING that the Court entered an order on February 24, 2021, alerting Plaintiff that the case had been pending for more than three months without any proceedings having been taken therein. D.E. 3. The letter cautioned that the case would be called on or around March 15, 2021, and if no sufficient reason was provided in writing, the case would be dismissed, *id.*; and it further

APPEARING that Plaintiff filed proof of service in the original state court matter on March 1, 2021, but there has been no further movement in this case;

THEREFORE, for the foregoing reasons, and for good cause show,

IT IS on this 14th day of April, 2021,

ORDERED that Plaintiff’s Complaint, D.E. 1-1 is **DISMISSED without prejudice**; and it is further

(Case No. 20-CV-20597-JMW-MF, *Earnest Polite V. Northwest Essex Community Healthcare Network, Inc. Et Al.*, U.S. District Court District Of New Jersey, Filed 4/14/21)

In November 2006, Barbara Watford Filed An Employment Discrimination Complaint Against Union Community College, Who Was Represented By Peterpaul

In November 2006, Barbara Watford Filed An Employment Discrimination Complaint Against Union Community College. (Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

Plaintiff

BARBARA J. WATFORD

represented by **BARBARA J. WATFORD**
P.O. BOX 312
KENDALL PARK, NJ 08824
732-801-0480
PRO SE

DAWN L. JACKSON
THE LAW OFFICE OF DAWN L. JACKSON, LLC
897 MCBRIDE AVENUE
WEST PATERSON, NJ 07424
973-256-2231
Fax: 973-256-7667
TERMINATED: 03/13/2009
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

UNION COUNTY COMMUNITY COLLEGE
TERMINATED: 06/16/2008

represented by **LUANNE M. PETERPAUL**
PETERPAUL LAW LLP
700 Bangs Ave
Suite 2
Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaulaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

- **Peterpaul Was Listed As The Attorney Representing Union Community College.** (Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

The Plaintiff Alleged The School Did Not Adhere To The Terms Of The Collective Bargaining Contract Agreement. (Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

Plaintiff requests that the court consider this Amendment to add The Union County College Staff Association/NJEA. Plaintiff was under a bargaining agreement between The Board of Trustees of Union County College and The Union County College Staff Association/NJEA when Plaintiff's position was terminated. Plaintiff states Defendant breach the contract for a promotion from Department Secretary to Administrative Assistant after the Plaintiff assist getting the new Practical Nursing Program up and running in 2003. Plaintiff contends that The Union County College Staff Association/NJEA Officials did not follow the contract and make the Defendant Union County College adhere to the terms of the bargaining contract agreement. Plaintiff contends that The Union County College Staff Association/NJEA and the Defendant Union County College did not abide by the following Articles under the contract agreement. The Defendant Union County College and The Union

(Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

- **The Plaintiff Further Alleged She Was Not Compensated For Overtime Worked.**

(Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

County College Staff Association/NJEA Officials as outlined in the agreement did not abide by the following articles:

Article VIII Hours of Work and Overtime: Overtime Hours worked in excess of thirty-five (35) hours per week shall be paid at a rate of one and one-half (1-1/2) times the employee's base hourly rate. Plaintiff contends that The Union County College Staff Association/NJEA did not make the Defendant Union County College pay the Plaintiff time 1 and 1/2 as outlined in the contract agreement when she worked in excess of the required 35-hour workweek.

(Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 11/20/06)

In January 2010, The Parties Agreed To Settle And The Case Was Dismissed. (Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 1/26/10)

BARBARA J. WATFORD,	:	
	:	Civil Action No. 06-5542 (FSH)
Plaintiff,	:	
v.	:	
	:	ORDER
UNION COUNTY COMMUNITY COLLEGE.	:	
	:	
Defendant.	:	

It appearing that it has been reported to the Court that the above-entitled action has been settled,

IT IS on this the 26th day of January, 2010,

ORDERED that this action is hereby dismissed without costs and without prejudice to the right, upon good cause shown within 30 days, to make an application to the Court if the settlement is not consummated. Failure to consummate the settlement will not result in the reopening of this matter by the Court to address the merits of the case; rather, if the settlement is not consummated, the Court will entertain an application solely to enforce the terms of the settlement agreement. Counsel are on notice that the good cause requirement will be stringently applied, and will require an affidavit detailing (a) the terms of the settlement agreement; and (b) why settlement could not be consummated within 30 days; and it is further

ORDERED that the terms of the settlement agreement are incorporated herein by reference and the Court shall retain jurisdiction over the settlement agreement to enforce its terms.

(Case No. 06-CV-05542-FSH-PS, *Barbara Watford V. Union County Community College, Et Al.*, U.S. District Court District Of New Jersey, Filed 1/26/10)

In December 1998, William Waller Filed A Job Discrimination Complaint On The Basis Of Race Against Easter Seal Society Of New Jersey, Who Was Represented By Peterpaul

In December 1998, William Waller Filed A Job Discrimination Complaint On The Basis Of Race Against Easter Seal Society Of New Jersey. (Case No. 98-CV-05632-AJL, *William Waller V. Easter Seal Society Of New Jersey*, U.S. District Court District Of New Jersey, Filed 12/10/98)

WALLER v. EASTER SEAL SOCIETY
 Assigned to: Judge Alfred J. Lechner, Jr.
 Demand: 50
 Cause: 42:1981 Job Discrimination (Race)

Date Filed: 12/10/1998
 Date Terminated: 05/05/1999
 Jury Demand: Plaintiff
 Nature of Suit: 442 Civil Rights: Jobs
 Jurisdiction: Federal Question

Plaintiff

WILLIAM E. WALLER

represented by **JENNIFER MYERS CHALAL**
 SPECTOR GADON & ROSEN PC
 1635 MARKET STREET
 7TH FLOOR
 PHILADELPHIA, PA 19103
 215-241-8888
 Email: jmyers@lawsgr.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

EASTER SEAL SOCIETY OF NEW JERSEY

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaullaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 98-CV-05632-AJL, *William Waller V. Easter Seal Society Of New Jersey*, U.S. District Court District Of New Jersey, Filed 12/10/98)

- **Peterpaul Was Listed As The Lead Attorney Representing Easter Seal Society Of New Jersey.** (Case No. 98-CV-05632-AJL, *William Waller V. Easter Seal Society Of New Jersey*, U.S. District Court District Of New Jersey, Filed 12/10/98)

In May 1999, The Case Was Dismissed After The Parties Most Likely Agreed To Settle.

(Case No. 98-CV-05632-AJL, *William Waller V. Easter Seal Society Of New Jersey*, U.S. District Court District Of New Jersey, Filed 5/4/99)

02/10/1999	6	Minute entry: Proceedings recorded by Ct-Reporter: Joanne Caruso.; Minutes of: 2/10/99; The following actions were taken, dates previously set. By Judge Alfred J. Lechner, Jr. (bl) (Entered: 02/11/1999)
05/04/1999	7	ORDER, dismissing action (signed by Judge Alfred J. Lechner, Jr.) (bl) (Entered: 05/05/1999)
05/05/1999		Case closed (bl) (Entered: 05/05/1999)

(Case No. 98-CV-05632-AJL, *William Waller V. Easter Seal Society Of New Jersey*, U.S. District Court District Of New Jersey, Filed 5/4/99)

In May 1998, Jorge Saraceno Filed A Complaint Against Springfield Senior Citizen Housing, Inc., Who Was Represented By Peterpaul, Alleging Violations Of The Fair Labor Standards Act

In May 1998, Jorge Saraceno Filed A Complaint Against Springfield Senior Citizen Housing, Inc., Alleging Violations Of The Fair Labor Standards Act.

(Case No. 98-CV-0221-NHP, *Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.*, U.S. District Court District Of New Jersey, Filed 5/12/98)

SARACENO v. SPRINGFIELD SENIOR
 Assigned to: Judge Nicholas H. Politan
 Demand: 50
 Cause: 15:2(a) Fair Labor Standards Act

Date Filed: 05/12/1998
 Date Terminated: 04/30/1999
 Jury Demand: Plaintiff
 Nature of Suit: 710 Labor: Fair Standards
 Jurisdiction: Federal Question

Plaintiff

JORGE SARACENO

represented by **BRUNILDA BONILLA**
 618 Newark Avenue
 Suite 220
 Jersey City, NJ 07306
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

SPRINGFIELD SENIOR CITIZEN HOUSING, INC.

represented by **LUANNE M. PETERPAUL**
PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaullaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 98-CV-0221-NHP, *Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.*, U.S. District Court District Of New Jersey, Filed 5/12/98)

- **Peterpaul Was Listed As The Lead Attorney Representing Springfield Senior Citizen Housing.** (Case No. 98-CV-0221-NHP, *Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.*, U.S. District Court District Of New Jersey, Filed 5/12/98)

In April 1999, The Parties Agreed To Settle And The Case Was Dismissed. (Case No. 98-CV-0221-NHP, *Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.*, U.S. District Court District Of New Jersey, Filed 4/29/99)

02/09/1999	6	ORDER, setting pretrial conference for 10:30 4/15/99 (signed by Mag. Judge Ronald J. Hedges) (sr) (Entered: 02/10/1999)
04/29/1999	7	ORDER, dismissing action as settled w/out costs & w/out prejudice (signed by Judge Nicholas H. Politan) (sr) (Entered: 04/30/1999)
04/30/1999		Case closed (sr) (Entered: 04/30/1999)

(Case No. 98-CV-0221-NHP, *Jorge Saraceno V. Springfield Senior Citizen Housing, Inc.*, U.S. District Court District Of New Jersey, Filed 4/29/99)

AS AN ATTORNEY, PETERPAUL HAS REPRESENTED CORPORATIONS WHO HAVE FOUGHT AGAINST UNIONS

In April 2015, 1199 SEIU United Healthcare Workers East Filed A Complaint Against GRE Properties Jersey City And Several Others, Who Were Represented By Peterpaul, Alleging Violations Of Labor Contracts

In April 2015, 1199 SEIU United Healthcare Workers East Filed A Complaint Against GRE Properties Jersey City And Several Others, Alleging Violations Of Labor Contracts. (Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

-----x
1199 SEIU UNITED HEALTHCARE
WORKERS EAST,

Plaintiff,

-versus-

Civil Action No.

GRE PROPERTIES JERSEY CITY LLC,
GRE JERSEY CITY INC., and MAJESTIC
REHABILITATION AND NURSING
CENTER, INC.,

Defendants.

COMPLAINT

-----x

Plaintiff 1199 SEIU United Healthcare Workers East (the "Union"), by its attorneys, as and for its complaint against Defendants GRE Properties Jersey City LLC, GRE Jersey City Inc., and Majestic Rehabilitation and Nursing Center, Inc. (collectively "Defendants"), respectfully alleges the following:

I. JURISDICTION AND VENUE

1. This action is brought pursuant to § 301 of the Labor Management Relations Act ("LMRA"), 29 U.S.C. §185, to compel arbitration of a grievance filed pursuant to a collective bargaining agreement between Plaintiff and the predecessor owner/operator of a for-profit long-term care nursing facility formerly known as "Liberty House Nursing Home of Jersey

(Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

- **Peterpaul Was Listed As A Lead Attorney Representing GRE Properties.** (Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

Defendant

GRE PROPERTIES JERSEY CITY LLC.

represented by **ANDREW BAYER**
PASHMAN STEIN WALDER HAYDEN
21 Main Street
Suite 200E
Hackensack, NJ 07601-7086
United Sta
201-488-8200
Fax: 201-488-5556
Email: abayer@pashmanstein.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

LUANNE M. PETERPAUL
PETERPAUL LAW LLP
700 Bangs Ave
Suite 2
Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaulaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

GRE JERSEY CITY, INC.

represented by **ANDREW BAYER**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

LUANNE M. PETERPAUL
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

The Plaintiff Union Alleged GRE Properties Did Not Honor The Collective Bargaining Contract Agreed To By The Parties Relating To The Employment And Transferring Of Employees. (Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

8. Since approximately 1969, the Union and its predecessor labor organization represented a bargaining unit of employees employed at the Nursing Home in the titles of Registered Nurses, Licensed Practical Nurses, Certified Nurses' Aides, Recreation Aides, Dietary Aides and Housekeepers (collectively and hereinafter, "Unit Employees") for the purpose of establishing wages, hours and other terms and conditions of employment. At all times since 1969, the wages, hours and working conditions of Unit Employees have been continuously set forth in and determined by a series of collective bargaining agreements ("CBAs") between the Union and Liberty House Nursing Home of Jersey City, Inc. ("Liberty House") which, until March 1, 2015, was the owner/operator of the Nursing Home.

9. By its terms, the most recent CBA between the Union and Liberty House was effective from March 13, 2008 through February 28, 2013. Pursuant to that CBA, an interest arbitration between the Union and Liberty House was conducted in 2012, and the award issued on November 7, 2012 in that interest arbitration extended the terms of the CBA, as modified in the award, through June 30, 2016. Annexed hereto as Exhibit A is a copy of the CBA effective from March 13, 2008 through February 28, 2013. Annexed hereto as Exhibit B is a copy of the interest arbitration award extending the CBA through June 30, 2016.

19. Effective March 1, 2015 (the "Transfer Date"), Liberty House transferred the operation of the Nursing Home to Defendants. On that date, the name of the Nursing Home was changed to Majestic Rehabilitation and Nursing Center.

20. On and after the Transfer Date, Defendants have continued the employment at the Nursing Home of almost all of the Unit Employees. Specifically, of the 135 Unit Employees employed by Liberty House at the Nursing Home immediately prior to the Transfer Date, all but one were offered continued employment there by Defendants. 124 of these Unit Employees have continued to work at the Nursing Home after the transfer. (Ten Unit Employees voluntarily left.) No new employees have been hired into the titles (e.g., RN, CNA) represented by the Union.

(Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/2/15)

In April 2016, The Case Was Jointly Dismissed With Prejudice After The Parties Most Likely Agreed To Settle. (Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/21/16)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
-----X
1199 SEIU UNITED HEALTHCARE
WORKERS EAST,

Plaintiff,

- vs. -

Civil Action No.:
15-2345 (SRC-CLW)

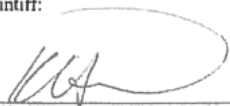
GRE PROPERTIES JERSEY CITY LLC,
GRE JERSEY CITY INC., AND MAJESTIC
REHABILITATION AND NURSING
CENTER, INC.,

Defendants.
-----X

STIPULATION OF
DISMISSAL

IT IS HEREBY STIPULATED AND AGREED by plaintiff 1199 SEIU UNITED HEALTHCARE WORKERS EAST and defendants GRE PROPERTIES JERSEY CITY LLC, GRE JERSEY CITY INC., and MAJESTIC REHABILITATION AND NURSING CENTER, INC., that any and all claims herein against all defendants are hereby withdrawn with prejudice.

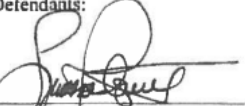
For Plaintiff:

By: 
Katherine H. Hansen, Esq.

GLADSTEIN, REIF & MEGINNISS, LLP
817 Broadway, 6th Floor
New York, New York 10003
(212) 228-7727

Attorneys for plaintiff

For Defendants:

By: 
Luanne Peterpaul, Esq.

GLUCKWALRATH LLP
11 Wharf Ave., Suite 4
Red Bank, New Jersey 07701
(732) 530-8822

Attorneys for defendants

(Case No. 15-CV-02345-SRC-CLW, *1199 SEIU United Healthcare Workers East V. GRE Properties Jersey City LLC, Et Al.*, U.S. District Court District Of New Jersey, Filed 4/21/16)

In July 1996, Edwin Stier And The Teamsters Industrial Employees' Pension And Welfare Funds Filed A Complaint Against Town Motors, Who Was Represented By Peterpaul, Alleging Violations Of The Employee Retirement Income Security Act, Most Likely Relating To Pensions

In July 1996, Edwin Stier And The Teamsters Industrial Employees' Pension And Welfare Funds Filed A Complaint Against Town Motors, Alleging Violations Of The Employee Retirement Income Security Act, Most Likely Relating To Pensions. (Case No. 96-CV-03302-WHW, *Edwin Stier, Et Al. V. Town Motors*, U.S. District Court District Of New Jersey, Filed 7/10/96)

STIER, et al v. TOWN MOTORS
 Assigned to: Judge William H. Walls
 Demand: 50
 Cause: 29:1132 E.R.I.S.A.-Employee Benefits

Date Filed: 07/10/1996
 Date Terminated: 08/26/1997
 Jury Demand: None
 Nature of Suit: 791 Labor: E.R.I.S.A.
 Jurisdiction: Federal Question

Arbitrator

RALPH V. MARTIN

represented by **RALPH V. MARTIN**
 WILLIAMS, CALIRI, MILLER, & OTLEY , PC
 1428 ROUTE 23
 PO BOX 995
 WAYNE, NJ 07474
 (973) 694-0800
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

EDWIN H. STIER
 CHAIRPERSON OF THE BOARD OF TRUSTEES OF THE TEAMSTERS INDUSTRIAL
 EMPLOYEES PENSION AND WELFARE FUNDS

represented by **KEVIN PATRICK MCGOVERN**
 METS, SCHIRO & MCGOVERN
 838 GREEN STREET
 SUITE 102
 ISELIN, NJ 08830
 732-636-0040
 Fax: 732-636-5705
 Email: kmcgovern@msmlaborlaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

THE TEAMSTERS INDUSTRIAL EMPLOYEES PENSION AND WELFARE FUNDS

represented by **KEVIN PATRICK MCGOVERN**
 (See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

TOWN MOTORS

represented by **LUANNE M. PETERPAUL**
 PETERPAUL LAW LLP
 700 Bangs Ave
 Suite 2
 Asbury Park, NJ 07712
 United Sta
 732-455-8080
 Fax: (732) 530-6770
 Email: luanne@peterpaullaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 96-CV-03302-WHW, *Edwin Stier, Et Al. V. Town Motors*, U.S. District Court District Of New Jersey, Filed 7/10/96)

- **Peterpaul Was Listed As The Lead Attorney Representing Town Motors.** (Case No. 96-CV-03302-WHW, *Edwin Stier, Et Al. V. Town Motors*, U.S. District Court District Of New Jersey, Filed 7/10/96)

In September 1997, The Parties Agreed To Settle And The Case Was Dismissed. (Case No. 96-CV-03302-WHW, *Edwin Stier, Et Al. V. Town Motors*, U.S. District Court District Of New Jersey, Filed 9/22/97)

08/25/1997	10	Report and ORDER, of settlement (signed by Judge William H. Walls (bl) (Entered: 08/26/1997)
08/26/1997		Case closed (bl) (Entered: 08/26/1997)
08/26/1997	11	ORDER, dismissing action (signed by Judge William H. Walls) (bl) (Entered: 08/27/1997)
09/22/1997	12	STIPULATION of dismissal pursuant to FRCP 41(a) (l) (ii) (bl) (Entered: 09/24/1997)

(Case No. 96-CV-03302-WHW, *Edwin Stier, Et Al. V. Town Motors*, U.S. District Court District Of New Jersey, Filed 9/22/97)

In March 2007, Gary Kendellen, Director Of The Region 22 Of The National Labor Relations Board For And On Behalf Of The National Labor Relations Board, Filed A Complaint Against Paramus Ford, Inc., Who Was Represented By Peterpaul

In March 2007, Gary Kendellen, Director Of The Region 22 Of The National Labor Relations Board For And On Behalf Of The National Labor Relations Board, Filed A Complaint Against Paramus Ford, Inc. (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

KENDELLEN v. PARAMUS FORD, INC.
Assigned to: Judge Jose L. Linares
Referred to: Magistrate Judge C. C. Cecchi
Cause: 29:160(1) National Labor Relations Act

Date Filed: 03/19/2007
Date Terminated: 01/25/2008
Jury Demand: None
Nature of Suit: 720 Labor: Labor/Mgt. Relations
Jurisdiction: U.S. Government Plaintiff

Plaintiff

GARY T. KENDELLEN
Regional Director of Region 22 of the National Labor Relations Board for and on behalf of the National Labor Relations Board

represented by **MARGUERITE GREENFIELD**
NATIONAL LABOR RELATIONS BOARD
REGION 22
20 WASHINGTON PLACE
NEWARK, NJ 07102-3115
973 645-2100
Fax: 973-645-3852
Email: margo.greenfield@nlrb.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

PARAMUS FORD, INC.

represented by **LUANNE M. PETERPAUL**
PETERPAUL LAW LLP
700 Bangs Ave
Suite 2
Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaulaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

- **Peterpaul Was Listed As The Lead Attorney Representing Paramus Ford.** (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

The Plaintiff Filed A Petition To Direct Paramus Ford To Recognize And Bargain With Local 355 United Service Workers Union, IUJAT, AFL-CIO Pending The Resolution Of Unfair Labor Practice Proceedings Before The National Labor Relations Board. (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

Petitioner seeks an interim order directing Respondent Paramus Ford, Inc. to recognize and bargain with Local 355 United Service Workers Union, IUJAT, AFL-CIO pending the resolution of unfair labor practice proceedings before the National Labor Relations Board, an agency of the United States government.

This court is asked to find that there is reasonable cause to believe that Respondent is a successor to Pistilli Ford, Inc., and that Respondent unlawfully failed to recognize and bargain with the incumbent Union. An employer is a successor when there is substantial continuity between the predecessor and successor enterprises and when a majority of the employees of the new employer in an appropriate unit had been employed by the predecessor. Respondent's bargaining obligation here matured when it began normal operations on February 13 at which time the Union was the representative of a majority of its parts and service employees.

Petitioner's support for its reasonable cause argument is set forth in the transcript of an administrative proceeding before Administrative Law Judge Steven Davis, and Judge Davis' decision and recommended order dated January 31, 2007 finding the violations alleged in the Complaint. Respondent's exceptions to that decision are pending before the National Labor Relations Board.

(Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

- **The Plaintiff Alleged Paramus Ford Unlawfully Refused To Bargain With The Union Even Though A Majority Of Its Employees Had Worked For The Prior Company Which Had A Collective Bargaining Relationship With The Union.** (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

In this proceeding, the Regional Director of Region 22 of the National Labor Relations Board, herein called the Board, pursuant to Section 10(j) of the National Labor Relations Act, as amended, herein called the Act, 29 U.S.C. § 160(j), petitions this district court for temporary injunctive relief pending the Board's final disposition of this matter.

On August 22, 2006, the Acting Regional Director for Region 22, which encompasses northern New Jersey, issued a Complaint and Notice of Hearing pursuant to Section 10(b) of the Act, upon unfair labor practice charges filed on June 13, 2006 by Local 355, United Service Workers Union, IUJAT, ALF-CIO, herein called the Union, against Paramus Ford, Inc., herein called the Respondent. The Complaint alleged that Respondent has engaged in unfair labor practices within the meaning of Section 8(a)(1) and (5) of the Act. The Acting Regional Director alleged that the Respondent, Paramus Ford, Inc., a successor to Pistilli Ford, Inc., unlawfully refused to bargain with the incumbent union notwithstanding that a majority of its employees had worked for the predecessor which had a collective bargaining relationship with the Union.

The Board conducted a hearing on the unfair labor practices alleged in the Complaint before an administrative law judge of the Board on October 31, 2006. On January 31, 2007, Administrative Law Judge Steven Davis issued a Decision and Order finding the violations as alleged.¹ Respondent's exceptions to that decision, filed on March 14, 2007, are pending before the Board.

On March 14, 2007, the Board authorized the Petitioner to seek injunctive relief pursuant to Section 10(j) of the Act directing Respondent to cease and desist from certain unfair labor practices and to take certain affirmative action. This Memorandum is submitted in support of the Petition.

(Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 3/19/07)

In April 2007, A Temporary Injunction Was Granted. (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 4/11/07)

GARY T. KENDELLEN, Regional Director of Region 22 of the National Labor Relations Board for an on behalf of the National Labor Relations Board,)	
)	
)	Civil Action No.: 07-1297 (JLL)
)	
Petitioner,)	ORDER IMPOSING
)	INJUNCTIVE RELIEF
v.)	
)	
PARAMUS FORD, INC.,)	
)	
Respondent.)	

LINARES, District Judge.

This matter comes before the Court upon the verified petition and declaration of Gary T. Kendellen, Regional Director of Region 22 of the National Labor Relations Board (the "NLRB"), for and on behalf of the Board, for a temporary injunction pursuant to Section 10(j) of the National Labor Relations Act, as amended, 29 U.S.C. § 160(j) (the "NLRA"), pending final disposition of the matters now before the Board on Case 22-CA-27444 and upon the issuance of an Order to Show Cause why injunctive relief should not be granted as prayed in said petition. The Court, upon consideration of the pleadings, evidence, memoranda, argument of counsel and the entire record in the case, has found and concluded that there is reasonable cause to believe that Respondent, Paramus Ford, Inc., has engaged in and is engaging in acts and conduct in violation of Section 8(a)(1) and (5) of the Act and that the requested temporary injunctive relief pursuant to Section 10(j) of the Act is just and proper in this case.

IT IS THIS 11th day of April, 2007,

ORDERED that pending the final disposition of the matters involved herein now pending before the National Labor Relations Board, or for a six (6) month period from the date of issuance of the injunction, whichever is shorter, Respondent, its officers, representatives, agents, alter egos, successors, assigns, servants, employees, and all members and persons acting in concert or participation with it, are hereby ordered to:

(Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 4/11/07)

- **In January 2008, The Parties Agreed To Settle And The Injunction Was Terminated.** (Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 1/24/08)

**ORDER DISSOLVING TEMPORARY INJUNCTION AND
TERMINATING PROCEEDING**

This Court having on April 11, 2007, entered a temporary injunction enjoining and restraining Respondent from engaging in certain acts and conduct set forth therein pending the final disposition of the matters involved pending before the National Labor Relations Board; and it appearing to the Court that the National Labor Relations Board has duly issued its Decision and Order which is the final disposition of the matters involved, and pursuant to Rule 41 (a) (2) of the Federal Rules of Civil Procedure, it is therefore

ORDERED that the temporary injunction entered herein on April 11, 2007, be and the same hereby is vacated and dissolved and the proceeding herein be and the same hereby is terminated without costs to either party.

(Case No. 07-CV-01297-JLL-CCC, *Gary Kendellen V. Paramus Ford, Inc.*, U.S. District Court District Of New Jersey, Filed 1/24/08)

***In August 2009, Peterpaul Represented St. Mary's Hospital, Who Filed A Complaint
Against JNESO District Council, IEOU, AFL-CIO***

In August 2009, St. Mary's Hospital Filed A Complaint Against JNESO District Council, IEOU, AFL-CIO. (Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

St. MARY'S HOSPITAL,	:	SUPERIOR COURT OF NEW JERSEY
	:	:CHANCERY DIV.: PASSAIC COUNTY
	:	:DOCKET NO.
	:	
PLAINTIFF,	:	<u>CIVIL ACTION</u>
	:	
VS	:	VERIFIED COMPLAINT
	:	
JNESO, DISTRICT COUNCIL 1,	:	
IUOE, AFL-CIO,	:	
	:	
DEFENDANT.	:	

Plaintiff, St. Mary's Hospital (hereinafter referred to as "St. Mary's" or "The Hospital"), located at 350 Boulevard, Passaic, New Jersey 07055, brings this action pursuant to R.R. 4:67-1 et seq. and N.J.S.A. 2A: 24-1 et seq. to vacate an arbitration award. Plaintiff says:

1. St. Mary's Hospital is the primary provider of quality healthcare to the Passaic and Bergen communities, and to areas of Essex and Hudson County. It is a non-profit acute care hospital offering a broad range of health care services and community outreach services. St. Mary's is a 287-bed hospital, which provides care to a large number of indigent patients and poor patients. St. Mary's Hospital is the sole surviving hospital in the City of Passaic.

(Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

- **Peterpaul Was Listed As A Lead Attorney Representing St. Mary's Hospital.** (Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

Plaintiff
ST. MARY'S HOSPITAL

represented by **FRANK J. PETERPAUL**
PETERPAUL, CLARK & CORCORAN, PC
ONE CLEVELAND PLACE
SPRINGFIELD, NJ 07081
(973) 467-5888
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

LUANNE M. PETERPAUL
PETERPAUL LAW LLP
700 Bangs Ave
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Asbury Park, NJ 07712
United Sta
732-455-8080
Fax: (732) 530-6770
Email: luanne@peterpaullaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

(Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

St. Mary's Sought To Vacate An Award Rendered In Arbitration Against St. Mary's In Favor Of The Union. (Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

Union"), is a labor organization. It represents Registered Nurses, and Technical employees employed by the Hospital. The terms and conditions of employment of the Registered Nurses and Technicians are governed by separate collective bargaining agreements between the Hospital and JNESO.

3. Plaintiff requests this Court to vacate the Award rendered by Gerard G. Restaino, Arbitrator, on April 15, 2009 ("The Award", Exhibit P-1).

4. In 2007, St Mary's purchased the assets of Passaic General Hospital, which had previously merged with Beth Israel Hospital. Passaic General was in bankruptcy.

5. After St. Mary's purchased the assets of Passaic General/Beth Israel, St. Mary's moved its entire operation into the Passaic General facility, located at 350 Boulevard, Passaic, New Jersey.

6. JNESO represented Registered Nurses and Technical Employees employed by Passaic General/Beth Israel for the purpose of collective bargaining regarding their terms and conditions of employment.

7. The Registered Nurses and Technical employees at St. Mary's Hospital were not unionized prior to the move into the Passaic General building.

(Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

- **The Award Of \$677,904.65 Was Related To Allegedly Unjust Termination Of The Hospital's Employees.** (Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

32. The Award does not find any facts regarding the seniority status of the named grievants or the seniority status of any other employee of St. Mary's.

33. The named grievants were laid off in proper seniority order. They exercised contractual rights and filled other jobs at the hospital.

34. The named grievants received hand delivered letters regarding their layoffs. The letters were not offered in evidence.

35. Copies of the layoff letters were mailed to the Union.

36. The Award, in the amount of \$677,904.65 is stated as "the cost to the employer." There is no finding that the grievants sustained any loss, nor any finding regarding their interim earnings or possible mitigation of damages.

37. The Arbitrator did not consider relevant provisions of the contract.

(Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 8/6/09)

In April 2010, Court Denied The Motion And The Award Was Granted. (Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 4/7/10)

<p>ST. MARY'S HOSPITAL, Plaintiff, vs. JNESO, DISTRICT COUNCIL 1, IUOE, AFL-CIO, Defendant.</p>	<p>Honorable Faith Hochberg Civil Action No.: 09-CV-03936 (FSH) CIVIL ACTION CONSENT ORDER CONFIRMING ARBITRATION AWARD</p>
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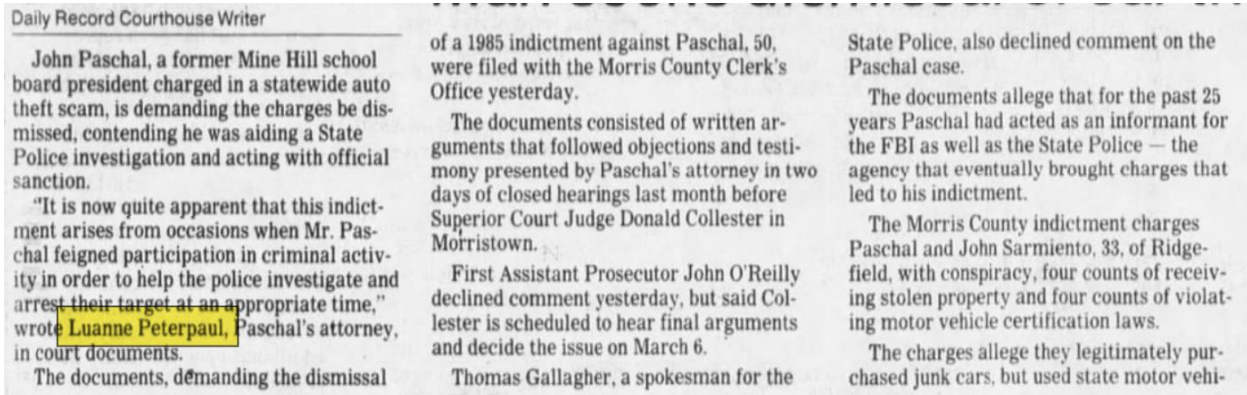
THIS MATTER having come before the Court by Peterpaul & Clark, (Luanne M. Peterpaul, Esq., appearing) attorneys for Plaintiff, pursuant to a Motion to Vacate an Arbitration Award and by Kroll Heineman, LLC (Curtiss T. Jameson, Esq., appearing) on a counterclaim to confirm an Arbitration Award; this Court having fully considered the moving and opposition papers submitted by the parties, and with the Consent of the parties, and for good and sufficient cause shown;

(Case No. 09-CV-03936-FSH-PS, *St. Mary's Hospital V. JNESO District Council, IEOU, AFL-CIO*, U.S. District Court District Of New Jersey, Filed 4/7/10)

MEDIA COVERAGE: PETERPAUL WAS KNOWN TO REPRESENT JOHN PASCHAL WHO WAS CHARGED IN A STATEWIDE AUTO THEFT SCAM

In 1987, Peterpaul Was Known To Represent John Paschal Who Was Charged In A Statewide Auto Theft Scam; Paschal Claimed The Charges Should Be Dismissed Because He Was Acting As An Informant

In 1987, Peterpaul Was Known To Represent John Paschal Who Was Charged In A Statewide Auto Theft Scam; Paschal Claimed The Charges Should Be Dismissed Because He Was Acting As An Informant. (Daily Record, 2/26/87)



(Daily Record, 2/26/87)

However, It Was Unclear If Paschal Was Still Acting As A State Police Informant Or If The Relationship Had Ever Been Severed

However, It Was Unclear If Paschal Was Still Acting As A State Police Informant Or If The Relationship Had Ever Been Severed. (Daily Record, 2/26/87)

ft charges

cle identification numbers on them to improperly gain titles between April 1980 and February 1983 for stolen cars that were to be sold for profit.

The documents refer to the testimony of two State Police investigators and one FBI agent, who stated that Paschal was an unpaid informant whose help led to numerous arrests involving car thefts and auto rings and resulted in the recovery of 80 to 100 cars.

But disputed is whether Paschal was acting under the direction of State Police between 1980 and 1983, when allegedly stolen cars and parts were brought to his Nick's

Auto Parts shop on Thomastown Road, Mine Hill. Paschal says he was working at the direction of Thomas Cornelissen, a State Police detective, when the alleged scam was in progress.

But according to portions of closed-hearing testimony included in defense documents, Cornelissen contends he severed the informant relationship with Paschal in the early 1980s when Paschal supposedly tried to bribe him.

Peterpaul alleges testimony by another State Police detective at the time, Bernard Kelly, and FBI Agent William Murphy indicate Paschal continued to aid police investigations in the early 1980s and Cornelissen never mentioned he severed the informant relationship.

(Daily Record, 2/26/87)

In May 1987, Paschal Pleaded Guilty To Evading More Than \$69,000 In Taxes On His 1981 Federal Income Tax Return

In May 1987, Paschal Pleaded Guilty To Evading More Than \$69,000 In Taxes On His 1981 Federal Income Tax Return. *(Daily Record, 5/29/87)*

Morris man guilty of evading taxes

CAMDEN — A Morris County man pleaded guilty in federal court yesterday to evading more than \$69,000 in taxes on a joint 1981 federal income tax return.

John G. Paschal, 51, of Mine Hill, admitted he underreported his 1981 income by \$146,000.

According to court papers, Paschal had reported income of only \$11,199, when in actuality his income was \$157,463.

(Daily Record, 5/29/87)

In August 1987, A State Judge Refused To Drop The Case Against Paschal Regarding Auto Theft

In August 1987, A State Judge Refused To Drop The Case Against Paschal Regarding Auto Theft. (Daily Record, 8/11/87)

A state judge has refused to dismiss theft charges against a former Mine Hill school board president who says he aided State Police and acted with official sanction when he was part of a statewide auto-theft scam.

"Even accepting the position of the defendant that he was an informer and had been one over a period of some 20 or 25 years, it by no means establishes that he was entitled to some sort of 'free pass' respecting criminal conduct," wrote Superior Court Judge Donald Collester, rejecting a demand to dismiss charges against 50-year-old John Paschal.

The opinion, released by Collester's office in Morristown yesterday, follows dismissal arguments at closed hearings in January.

(Daily Record, 8/11/87)

However, In 1989, A Judge Dismissed Criminal Charges Against Paschal After Ruling That An Invalid Search Warrant Had Led To The Charges

However, In 1989, A Judge Dismissed Criminal Charges Against Paschal After Ruling That An Invalid Search Warrant Had Led To The Charges. (Daily Record, 7/7/89)

MORRISTOWN — A Superior Court judge, citing an invalid search warrant, has dismissed criminal charges against a Mine Hill resident linked to an alleged statewide auto theft scam.

In an order signed June 30 and filed yesterday, Judge Donald Collester dismissed a 1985 indictment against John Paschal, 52, and an alleged cohort, John Sarmiento, 34, of Ridgefield.

Collester said State Police acted on state evidence when they raided Paschal's auto parts yard on Thomastown Road in Mine Hill on July 15, 1980. The warrant used by the officers was based on information that was months old.

Paschal and Sarmiento were charged with using motor vehicle identification numbers on junk cars to improperly gain titles for stolen cars that were to be sold.

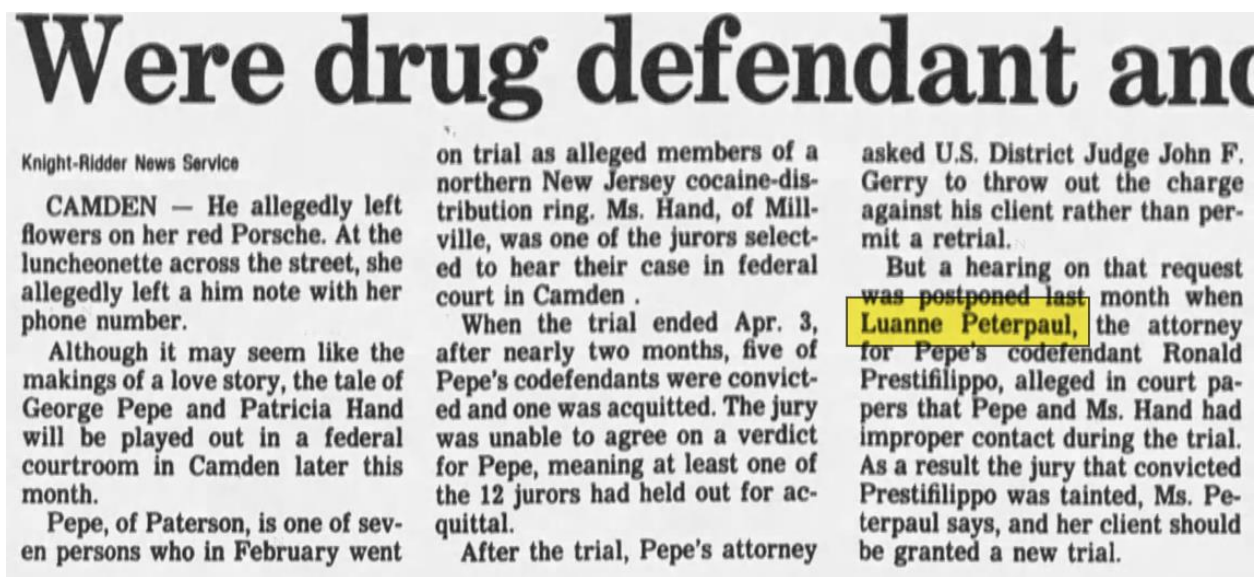
The alleged scam went on between April 1980 and February

(Daily Record, 7/7/89)

MEDIA COVERAGE: PETERPAUL WAS KNOWN TO REPRESENT RONALD PRESTIFILIPPO, A CODEFENDANT WITH GEORGE PEPE WHO WAS CHARGED AS A MEMBER OF A NORTHERN NEW JERSEY COCAINE DISTRIBUTION RING

In 1987, Peterpaul Was Known To Represent Ronald Prestifilippo, A Codefendant With George Pepe Who Was Charged As A Member Of A Northern New Jersey Cocaine Distribution Ring

In 1987, Peterpaul Was Known To Represent Ronald Prestifilippo, A Codefendant With George Pepe Who Was Charged As A Member Of A Northern New Jersey Cocaine Distribution Ring. *(The Record, 5/14/87)*



(The Record, 5/14/87)

MEDIA COVERAGE: PETERPAUL REPRESENTED A COUNTY COLLEGE AGAINST ALLEGATIONS FROM A WOMAN THAT SHE WAS SUBJECT TO HARASSMENT AND RELATION

In 2001, Mary Jean Liroy Sued Union County College (UCC) Alleging She Was Subject To Harassment, Retaliation, And Hostility After She Complained A Colleague Was Denied Tenure In 1997 Because She Was A Woman

In 2001, Mary Jean Liroy Sued Union County College (UCC) Alleging She Was Subject To Harassment, Retaliation, And Hostility After She Complained A Colleague Was Denied Tenure In 1997 Because She Was A Woman. *(Home News, 4/26/01)*

UNION COUNTY: A hearing tomorrow on a biology professor's lawsuit against Union County College will test whether the state's so-called Whistle-blower Law applies to tenured educators.

Mary Jean Lioy of Cranford is suing UCC and professor William Dunscombe, head of the college's biology department, in a case that is being closely watched by the New Jersey Education Association and other unions representing tenured educators.

Lioy, a professor at the Cranford-based college since 1976 with expertise in microbiology, alleges in the suit filed in Superior Court, Elizabeth, that Dunscombe subjected her to harassment, retaliation and hostility after she complained that a colleague was denied tenure in 1997 because she is a woman and after questioning the use

(Home News, 4/26/01)

Peterpaul Represented UCC And Claimed Lioy And Her Superior Had A Personality Conflict That Was Blown Out Of Proportion

Peterpaul Represented UCC And Claimed Lioy And Her Superior Had A Personality Conflict That Was Blown Out Of Proportion. (Home News, 4/26/01)

The lawsuit, filed by Linda Wong and Dan Fleming of the Edison law firm Wong Fleming, alleges that the harassment and retaliation included denying Lioy teaching supplies and grant money she was entitled to, using profane language about her, excluding her from meetings, canceling her classes and, in one instance, bringing in a female stripper to perform for faculty members.

The college denies Lioy's allegations. Luanne Peterpaul, an attorney for UCC, said the situation amounts to "a personality conflict between two individuals that was totally blown out of proportion." Simply put, she said, the two don't like each other.

Peterpaul said no stripper ever set foot on campus. She said a group of people once brought in a dancer as a joke for Dunscombe's birthday, but he had no knowledge of the incident ahead of time, and the college did not condone it and later reprimanded those responsible for it.

Dunscombe's attorney, Rob-

(Home News, 4/26/01)

MEDIA COVERAGE: PETERPAUL REPRESENTED A GROUP OF RESTAURANTS WHO VIOLATED THE FAIR LABOR STANDARDS ACT

In 2015, Peterpaul Represented The Smith Group, Whose Restaurants Paid Back Overtime To Workers Following A Federal Investigation For Violations Of The Fair Labor Standards Act

In 2015, Peterpaul Represented The Smith Group, Whose Restaurants Paid Back Overtime To Workers Following A Federal Investigation For Violations Of The Fair Labor Standards Act. *(Asbury Park Press, 7/7/15)*

ASBURY PARK — Porta, the Brickwall Tavern and Dining Room and three other restaurants owned by the city-based Smith Group are paying back overtime to workers following a federal investigation, the Asbury Park Press has learned.

An attorney for the restaurant group said the investigation is complete and the “amicable resolution” between the restaurants and workers is being made final.

A spokeswoman for the U.S. Department of Labor confirmed that an investigation had been launched but said she could discuss few details because it was an open case.

The other restaurants targeted by the Department of Labor’s Wage and Hour Division are the Asbury Park eateries Pascal & Sabine, Goldie’s — no longer in business — and The Monk Room in Newark.

The division began the investigation in August, Labor Department spokeswoman Lenore Uddyback-Fortson said. If the Wage and Hour Division investigates, it’s for possible violations of the Fair Labor Standards Act, “which covers overtime and minimum wage,” she said.

The company is now issuing checks for back overtime pay to employees, ~~said the Smith Group’s Red Bank-based attorney,~~ Luanne M. Peterpaul.

(Asbury Park Press, 7/7/15)

PETERPAUL'S PERSONAL FOIBLES

Luanne Peterpaul boasts several vulnerabilities which others may seek to capitalize. Peterpaul has been accused negligence in her capacity as a board member of an apartment complex and while operating a vehicle. In June 2020, a negligence complaint was filed against Peterpaul and other members of the board of trustees of the Village of Red Inn Condominiums, alleging the units had “been plagued with severe and pervasive water infiltration, damage, and mold, resulting from the defective conditions in the common areas.” The plaintiff additionally claimed that the board of trustees has “been aware of the problems...for years yet the trustees have failed to carry out their basic duties.” In December 2022, the parties agreed to settle and the case was dismissed. Likewise, Peterpaul’s auto negligence is currently ongoing. Despite her own negligent behavior, Peterpaul has also filed at least one lawsuit against another person in which she claimed she was injured on their property due to negligence. The parties in this case settled and the case was dismissed. It should also be noted that at least one civil judgment has been entered against Peterpaul for nearly \$1,000.

PETERPAUL HAS FACED LEGAL ACTION OVER HER NEGLIGENCE AS A BOARD MEMBER OF AN APARTMENT COMPLEX

In June 2020, Michael Curry Filed A Complaint Against Peterpaul And Other Members Of The Board Of Trustees Of The Village Of Red Inn Condominiums, Alleging The Units Had “Been Plagued With Severe And Pervasive Water Infiltration, Damage, And Mold, Resulting From The Defective Conditions In The Common Areas”

In June 2020, Michael Curry Filed A Complaint Against Peterpaul And Other Members Of The Board Of Trustees Of The Village Of Red Inn Condominiums, Alleging The Units Had “Been Plagued With Severe And Pervasive Water Infiltration, Damage, And Mold, Resulting From The Defective Conditions In The Common Areas.” (Case No. 2072CV00219, *Michael Curry V. Ellen Battaglini, Et Al.*, Barnstable County Superior Court, Filed 6/5/20)

MICHAEL CURRY, on behalf of the	*
VILLAGE AT RED INN	*
CONDOMINIUM TRUST and individually,	*
<i>Plaintiff</i>	*
	*
v.	*
	*
ELLEN BATTAGLINI, LUANNE PETERPAUL	*
STEVE NAHA, DONALD MORTON AND	*
MARTIN STARK, TRUSTEES OF THE	*
VILLAGE AT RED INN	*
CONDOMINIUM TRUST	*
<i>Defendants</i>	*

VERIFIED COMPLAINT


A. INTRODUCTORY STATEMENT

The Plaintiff is a unit owner in the Village at Red Inn Condominium. The Plaintiff's unit and other units have been plagued with severe and pervasive water infiltration, damage, and mold, resulting from defective conditions in the Common Areas of the condominium. The defendants, Board of Trustees, have been aware of problems with water infiltration for years even before Plaintiff's purchase yet the Trustees have failed to carry out their basic duties. In addition, Plaintiff has made numerous requests for access to the books and records of the condominium, records to which the Plaintiff is entitled pursuant to G.L. Chapter 183A §10. Defendants have refused, failed and neglected to provide access to these records.

(Case No. 2072CV00219, *Michael Curry V. Ellen Battaglini, Et Al.*, Barnstable County Superior Court, Filed 6/5/20)

- **The Plaintiff Alleged That The Board Of Trustees Has “Been Aware Of The Problems...For Years Yet The Trustees Have Failed To Carry Out Their Basic Duties.”** (Case No. 2072CV00219, *Michael Curry V. Ellen Battaglini, Et Al.*, Barnstable County Superior Court, Filed 6/5/20)

In December 2022, The Parties Agreed To Settle And The Case Was Dismissed. (Case No. 2072CV00219, *Michael Curry V. Ellen Battaglini, Et Al.*, Barnstable County Superior Court, Filed 12/2/22)

<p>ORDER FOR ENTRY OF DISMISSAL NISI</p>	<p>DOCKET NUMBER 2072CV00219</p>	<p>Trial Court of Massachusetts The Superior Court </p>
<p>CASE NAME: Michael Curry, on behalf of the Village at Red Inn Condominium Trust, and individually vs. Ellen Battaglini et al</p>		<p>Scott W. Nickerson, Clerk of Court Barnstable County</p>
<p>TO:</p>		<p>COURT NAME & ADDRESS Barnstable County Superior Court 3195 Main Street Barnstable, MA 02630</p>

The above entitled action came on before the court, Hon. Thomas J Perrino, and there upon was reported settled by counsel of record.

It is **ORDERED** that an AGREEMENT FOR JUDGMENT or STIPULATION OF DISMISSAL, be filed in the Clerk's office by 12/02/2022.

If said Agreement or Stipulation is not filed by said date the Clerk is hereby directed to prepare, sign and enter Judgment dismissing the Complaint, and all other claims, without prejudice and without statutory costs.

(Case No. 2072CV00219, *Michael Curry V. Ellen Battaglini, Et Al.*, Barnstable County Superior Court, Filed 12/2/22)

**PETERPAUL HAS FACED LEGAL ACTION OVER ALLEGATIONS OF
AUTO NEGLIGENCE**

In March 2021, Felicia Jones Filed An Auto Negligence Complaint Against Peterpaul

In March 2021, Felicia Jones Filed An Auto Negligence Complaint Against Peterpaul In Monmouth County, New Jersey. (Case No. MON L 001000-21, *Felicia Jones V. Luanne Peterpaul*, Monmouth County Superior Court, Filed 3/22/21)

FELICIA JONES, <i>as Guardian ad Litem</i> for MARRIAH JONES, a minor, and FELICIA JONES, individually, <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> LUANNE M. PETERPAUL, <p style="text-align: center;">Defendants.</p>	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MONMOUTH COUNTY DOCKET NO. MON-L- <p style="text-align: center;"><u>Civil Action</u></p> <p style="text-align: center;">COMPLAINT AND DEMAND FOR TRIAL BY JURY AND VERBAL THRESHOLD CERTIFICATION</p>
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PLAINTIFFS, Felicia Jones, individually and as *Guardian ad Litem* for Marriah Jones, a minor, and residing at 828 Dunlewy Street, in the City of Asbury Park, County of Monmouth and State of New Jersey, by way of Complaint against Defendants herein, says:

FIRST COUNT

1. On or about September 1, 2019, and at all times pertinent hereto, Minor Plaintiff, Marriah Jones, was a passenger of a motor vehicle, which was lawfully and carefully proceeding southbound on Ocean Avenue, in the City of Long Branch, County of Monmouth, State of New Jersey.

2. At all times pertinent herein, Defendant, Luanna M. Peterpaul with an address of 15 Rivergate Way, in the City of Long Branch, County of Monmouth, and State of New Jersey, was the operator of a motor vehicle which was also traveling southbound on Ocean Avenue, in the City of Long Branch, County of Monmouth, State of New Jersey.

3. At all times pertinent hereto, Defendant, Luanne M. Peterpaul had a duty to operate her motor vehicle in a safe and prudent manner so as to avoid causing an unreasonable risk of injury to others.

4. On or about September 1, 2019, Defendant, Luanne M. Peterpaul, negligently and carelessly breached her duty as aforesaid in that she operated the motor vehicle in a negligent and careless manner, failed to maintain control of her vehicle, failed to make proper observations, failed to take evasive action, failed to keep a safe distance between her vehicle and the vehicle traveling in front of her, traveled at a speed in excess of that which was appropriate for the conditions then existing, and otherwise failed to exercise due care in the operation of her vehicle, all of which caused and/or contributed to the rear-end crash involving the motor vehicle which was operated by Plaintiff, Marriah Jones.

5. As a direct and proximate result of the negligence and carelessness of Defendant, Luanna M. Peterpaul as aforesaid, Plaintiff, Marriah Jones, sustained serious and permanent physical injuries and emotional grief, torment and anguish, have been and will in the future be prevented from engaging in her usual pursuits and activities, has been and will in the future be caused to expend great sums of money in an effort to seek a cure for her injuries, has been and will in the future be caused to sustain great economic loss, and has been and will in the future be caused to sustain a loss of enjoyment of life.

(Case No. MON L 001000-21, *Felicia Jones V. Luanne Peterpaul*, Monmouth County Superior Court, Filed 3/22/21)

- **This Case Is Currently Ongoing.** (Case No. MON L 001000-21, *Felicia Jones V. Luanne Peterpaul*, Monmouth County Superior Court, Filed 3/22/21)

**YET, PETERPAUL HAS TAKEN LEGAL ACTION AGAINST OTHERS
OVER ALLEGATIONS OF NEGLIGENCE**

In August 2020, Peterpaul Filed A Complaint Against Michele Dunn Alleging She Was Injured While On Dunn’s Property

In August 2020, Peterpaul Filed A Complaint Against Michele Dunn Alleging She Was Injured While On Dunn’s Property. (Case No. MON L 002429-20, *Luanne Peterpaul V. Michele Dunn*, Monmouth County Superior Court, Filed 8/3/20)

<p>LUANNE M. PETERPAUL, Plaintiff, v. MICHELE DUNN, John Does 1-10 and/or ABC Corporations 1-10, Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION - MONMOUTH COUNTY DOCKET NO. CIVIL ACTION COMPLAINT, JURY DEMAND, AND DESIGNATION OF TRIAL COUNSEL</p>
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Plaintiff Luanne Peterpaul ("Plaintiff"), by way of Complaint against defendants Michele Dunn ("Defendant"), John Does 1-10 and ABC Corporations 1-10, says:

5. On August 3, 2018 Plaintiff was lawfully on the Property at Defendant's express and/or implied invitation.

6. Defendant had a duty, under all circumstances, to provide a safe environment to Plaintiff and to warn her of any hazardous or dangerous conditions at the Property.

7. As of August 3, 2018, Defendant managed, maintained, designed, constructed, assembled, controlled, secured, inspected and/or repaired a rock wall (the "Rock Wall") located near the front entrance to the Property.

8. On and before August 3, 2018, the Rock Wall at the Property was in a hazardous condition.

9. On August 3, 2018, while lawfully on the Property, Plaintiff tripped and fell due to the hazardous condition of the Rock Wall and suffered severe and traumatic injuries.

10. Defendant was negligent in the ownership, management, maintenance, design, construction, inspection, supervision and control of the Property in causing and/or permitting a hazardous condition to remain on the Property, which constituted a danger to those walking on the Property including Plaintiff.

(Case No. MON L 002429-20, *Luanne Peterpaul V. Michele Dunn*, Monmouth County Superior Court, Filed 8/3/20)

- **In February 2021, The Case Was Dismissed For Lack Of Prosecution After The Parties Most Likely Agreed To Settle.** (Case No. MON L 002429-20, *Luanne Peterpaul V. Michele Dunn*, Monmouth County Superior Court, Filed 2/13/21)

OCEAN COUNTY SUPERIOR COURT
OCEAN COUNTY COURTHOUSE
CIVIL LAW DIVISION
TOMS RIVER NJ 08754

TELEPHONE - (732) 504-0700 EXT. 64385, COLLEEN BRONZINO TEAM 002
COURT HOURS: 8:30 AM - 4:30 PM DATE FEBRUARY 12, 2021

DOCKET NO. OCN L -003092 20
NAME: PETERPAUL LUANNE VS DUNN MICHELE

IT IS HEREBY ORDERED THAT UNDER RULES 1:13-7 OR 4:43-2, THE ABOVE MATTER HAS BEEN DISMISSED WITHOUT PREJUDICE FOR LACK OF PROSECUTION. THIS ORDER CLOSES FILE. JUDGMENTS PREVIOUSLY ENTERED IN THIS CASE ARE NOT AFFECTED BY THIS ORDER.

(Case No. MON L 002429-20, *Luanne Peterpaul V. Michele Dunn*, Monmouth County Superior Court, Filed 2/13/21)

PETERPAUL HAS FACED LEGAL ACTION FOR FAILING TO MEET HER FINANCIAL OBLIGATIONS

In June 2002, A Civil Judgment Of \$920 Was Entered Against Peterpaul And Her Former Law Firm

According To Nexis, In June 2002, A Civil Judgment Of \$920 Was Entered Against Peterpaul And Her Former Law Firm. (Nexis, Accessed 8/3/23)

No.	Type	Status	Amount	Filing Date	Filing Number	Jurisdiction
1.	Civil Suit	See Details	\$920.00	06/19/2002	DC-008225-2002	New Jersey
<p>Debtor 1</p> <p>Luanne M Peterpaul</p> <p>1 Cleveland Pl Springfield, NJ 07081-1507 1 Cleveland Pl Springfield, NJ 07081-1507 SSN: 157-52-XXXX Filing Status: Updates May Be Present Elsewhere In This Report; Check The Court For The Current Status</p> <p>Debtor 2</p> <p>Peterpaul Clark & Corcoran</p> <p>1 Cleveland Pl Springfield, NJ 07081-1507 1 Cleveland Pl Springfield, NJ 07081-1507 Filing Status: Updates May Be Present Elsewhere In This Report; Check The Court For The Current Status</p> <p>Creditor 1</p> <p>Gerald Zakim</p> <p>Filing 1</p> <p>Type: Civil Suit Agency: New Jersey Superior Court Law Division Special Civil Part Agency State: NJ Agency County: Union Number: DC-008225-2002</p>						

(Nexis, Accessed 8/3/23)

PETERPAUL’S ANTI-GROWTH POLICY AGENDA AND LEFTIST POLITICS

PETERPAUL IS BACKED BY LOCAL UNIONS – INCLUDING THE NEW JERSEY EDUCATION ASSOCIATION

The New Jersey Building And Construction Trades Council Is Supporting Peterpaul

“The New Jersey Building And Construction Trades Council Is Taking Sides In A Competitive State Assembly Race In Monmouth County, Backing Two Democratic Challengers Over A Pair Of Republican Assemblywomen. The Union Group Voted To Endorse Margie Donlon And Luanne Peterpaul In The 11th District, Where First-Term Lawmakers Marilyn Piperno (R-Colts Neck) And Kim Eulner (R-Shrewsbury) Seek Re-Election.” “The New Jersey Building and Construction Trades Council is taking sides in a competitive State Assembly race in Monmouth County, backing two Democratic challengers over a pair of Republican assemblywomen. The union group voted to endorse Margie Donlon and Luanne Peterpaul in the 11th district, where first-term lawmakers Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury) seek re-election. The building trades group had skipped over the Assembly race in June when they made their initial round of endorsements, backing only State Sen. Vin Gopal (D-Long Branch) for a third term. Some key Democrats protested loudly to Bill Mullen, the NJBCTC president, who quickly assured that Donlon and Peterpaul would get support when they met a month later. That happened without objection on Monday. Still, it remains unclear why Mullen decided to skip the Assembly race in the first place. Mullen has not returned a call seeking an explanation. It’s been a rough cycle for Mullen, who is facing considerable criticism for supporting Democratic non-incumbents against two top officials of the International Union of Operating Engineers Local 825 in South Jersey legislative races: Latham Tiver for State Senate in the 8th and Matt Walker for Assembly in the 4th.” ([NJ Globe](#), 7/20/23)

In 2023, Donlon And Peterpaul Were Backed By The CWA. “The CWA made no Assembly endorsements in South Jersey, except for Majority Whip Carol Murphy (D-Mount Laurel), who is in the safely Democratic 7th district. A previous announcement listed endorsements for Democratic State Sen. Vin Gopal (D-Long Branch) and his running mates, Luanne Peterpaul and Margie Donlon. Peterpaul and Donlon face incumbents Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury). Four Democratic incumbents don’t have CWA endorsements: Richard Codey (D-Roseland), Renee Burgess (D-Irvington), Teresa Ruiz (D-Newark), and Brian P. Stack (D-Union City). “Everyone deserves the opportunity to work in a safe, respectful environment with fair wages and benefits,” said Dennis Trainor, Vice President for CWA District 1. “We are extremely proud to back these Assembly and Senate candidates, because we know they’ll be steadfast, strong supporters of working families and the labor movement here in New Jersey.”” ([NJ Globe](#), 6/15/23)

In 2023, Peterpaul Was Backed By The AFL-CIO

In 2023, Donlon, Peterpaul, And Gopal Were Backed By The AFL-CIO. “The AFL-CIO endorsed three Republican incumbents for re-election: State Sen. Vince Polistina (R-Egg Harbor

Township), Assemblyman Don Guardian (R-Atlantic City), and Assemblywoman Claire Swift (R-Margate). The building trades declined to support anyone in the 2nd district. The endorsements in the 3rd district went to Democrat John Burzichelli, a former ten-term assemblyman who is challenging State Sen. Ed Durr (R-Logan); for the Assembly, the union is backing Democrats Heather Simmons, a Gloucester County freeholder, and Dave Bailey, Jr. against Assemblywoman Bethanne McCarthy Patrick (R-Mannington) and her running mate, Hopewell Township Committeeman Thomas Tedesco. In the 8th district, the AFL-CIO went Republican: Latham Tiver, a business agent for Operating Engineers Local 825 for Senate, and incumbents Brandon Umba (R-Medford) and Michael Torrissi, Jr. for Assembly. No endorsement was made for State Senate in the 1st district, where Republican Michael Testa, Jr. (R-Vineland) is seeking a third term, but AFL-CIO endorsements went to his running mates, Assemblymen Antwan McClellan (R-Ocean City) and Erik Simonson (R-Lower Township). The AFL-CIO went with Democratic challengers Luanne Peterpaul, a former municipal court judge, and Ocean Township Councilwoman Margie Donlon, in their bids to unseat freshmen Republican Assemblywoman Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury) in the 11th. State Sen. Vin Gopal (D-Long Branch) also won the union endorsement.” ([NJ Globe](#), 6/14/23)

In 2023, The Monmouth-Ocean County Building and Construction Trades Council Backed Peterpaul

In 2023, The Monmouth-Ocean County Building and Construction Trades Council Backed Donlon, Peterpaul, And Gopal. “The Monmouth-Ocean County Building and Construction Trades Council has endorsed two Democratic challengers for State Assembly in the 11th district and is asking the state building trades council to do the same. “The Monmouth-Ocean County Building Trades gives our full endorsement to Senator Vin Gopal’s running mates: Assembly candidates Dr. Margie Donlon and former Judge Luanne Peterpaul,” said Tom DeBartolo, the president of the local building trades council. The New Jersey Building and Construction Trades Council had endorsed only Gopal (D-Long Branch) last week; they didn’t take sides in the Assembly race, where Republicans Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury) are seeking second terms. “We are confident in speaking with them, they will join Senator Gopal as ardent supporters for the men and women of our building trades,” DeBartolo said. “We have sent a request to the state building trades to endorse both at their next council meeting.” Bill Mullen, the president of the New Jersey Building and Construction Trades, has been taking heat from both parties since he announced his legislative endorsements last week, with some union leaders telling the New Jersey Globe that Mullen botched the process. A new meeting is set for July.” ([NJ Globe](#), 6/13/23)

In 2023, The NJEA Backed Peterpaul

In 2023, The NJEA Backed Donlon, Peterpaul, And Gopal. “Early endorsements from New Jersey’s largest public employee union went to Democrats in some of the state’s most politically competitive legislative districts – and in some Democrats in safe districts — allowing the New Jersey Education Association PAC to make early financial contributions. The NJEA is backing State Sen. Vin Gopal (D-Long Branch), the chairman of the Senate Education Committee, for re-

election to a third term in the 11th district, along with two Democratic Assembly challengers: Ocean Township Councilwoman Margie Donlon and former Asbury Park Municipal Court Judge Luanne Peterpaul, who are seeing to unseat GOP incumbents Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury). The influential union also endorsed State Sen. Andrew Zwicker (D-South Brunswick), Assemblyman Roy Freiman (D-Hillsborough), and Democrat Mitchell Drulis in the 16th, and State Sen. Joseph Lagana (D-Paramus), Assembly Appropriations Committee Chair Lisa Swain (D-Fair Lawn) and Assemblyman Christopher Tully (D-Bergenfield) in the 38th.” [\(NJ Globe, 4/26/23\)](#)

In April 2023, Peterpaul ‘Liked’ Tweet That Supported The NEA And Their Lobbying Of Congress

In April 2023, Peterpaul ‘Liked’ Tweet That Supported The NEA And Their Lobbying Of Congress. (Business Profile, [Twitter](#), 4/28/23)



(Business Profile, [Twitter](#), 4/28/23)

In 2023, Peterpaul Was Endorsed By The NJ LCV

In 2023, Donlon, Peterpaul, And Gopal Were Endorsed By The NJ LCV. “New Jersey League of Conservation Voters (New Jersey LCV), the political voice for the environment, announced their slate of endorsements for the 2023 New Jersey legislative elections, encompassing 56 candidates across 24 districts of which 40% are women and 26% are candidates of color. New Jersey LCV works to elect viable candidates, without regard to party affiliation, who have demonstrated an active or affirmative willingness and capacity to advance New Jersey LCV’s pro-environment priorities. “We could not be prouder of the dedicated, pro-environment leaders in this round of legislative endorsements, and we look forward to electing them to office and working together to build a more equitable and sustainable clean energy future for our children and grandchildren,” said Allison McLeod, Senior Policy Director, New Jersey LCV. “Codifying 100% clean energy by 2035, advancing offshore wind, and

strengthening our democracy are all on the ballot. That’s why it’s important that every registered voter participate and support these environmental champions.” (Insider NJ, 7/6/23)

PETERPAUL APPEARS TO SUPPORT INCREASING WAGE MANDATES (MINIMUM WAGE)

In 2023, Peterpaul’s Joint Candidate Campaign Profile Called For A \$15 An Hour Minimum Wage

In May 2023, Peterpaul’s Joint Candidate Campaign Profile Called For A \$15 An Hour Minimum Wage. (Joint Candidate Campaign Profile, [Instagram](#), 5/15/23)



(Joint Candidate Campaign Profile, [Instagram](#), 5/15/23)

In 2018, Peterpaul ‘Liked’ A Tweet That Called For \$15/Hour Minimum

In February 2018, Peterpaul ‘Liked’ A Tweet That Called For \$15/Hour Minimum. (Business Profile, [Twitter](#), 2/26/18)

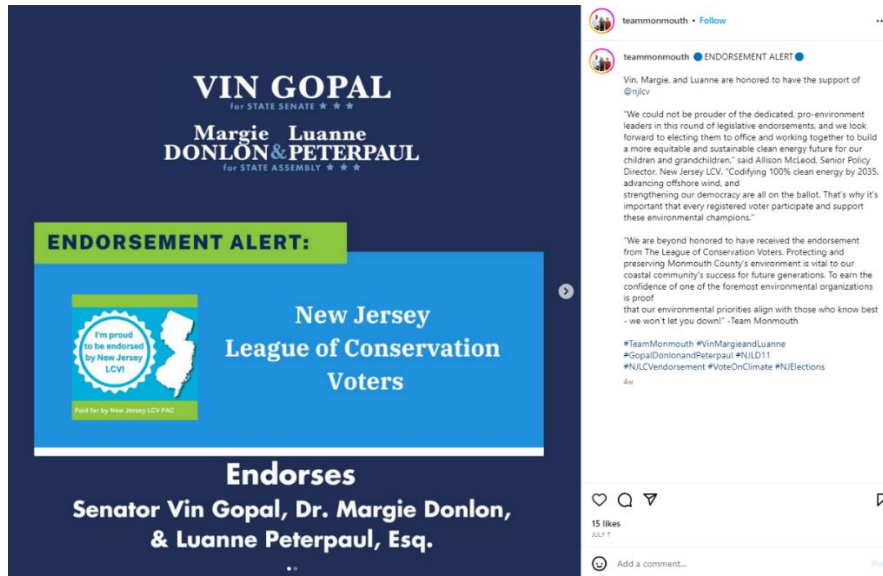


(Business Profile, [Twitter](#), 2/26/18)

PETERPAUL HAS INDICATED SUPPORT FOR ANTI-GROWTH ENERGY POLICIES

In 2023, Peterpaul’s Joint Candidate Campaign Profile Called To Codify 100% Clean Energy By 2035”

In July 2023, Peterpaul’s Joint Candidate Campaign Profile Called To Codify 100% Clean Energy By 2035”. (Joint Candidate Campaign Profile, [Instagram](#), 7/7/23)



(Joint Candidate Campaign Profile, [Instagram](#), 7/7/23)

In 2020, Peterpaul ‘Liked’ A Tweet That Supported “Climate Change Education Across Our K-12 Learning Standards”

In June 2020, Peterpaul ‘Liked’ A Tweet That Supported “Climate Change Education Across Our K-12 Learning Standards”. (Business Profile, [Twitter](#), 6/3/20)



(Business Profile, [Twitter](#), 6/3/20)

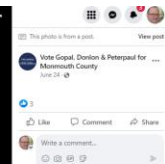
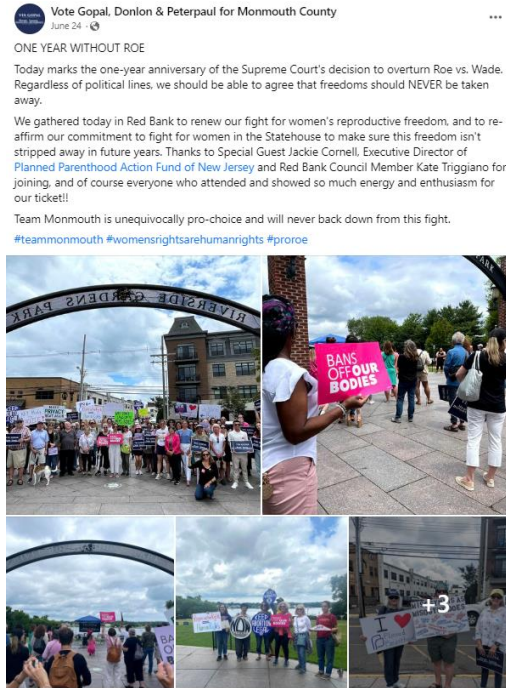
PETERPAUL APPEARS UNAPOLOGETICALLY PRO-ABORTION

In 2023, Peterpaul Held A Rally Criticizing The Supreme Court's Dobbs Decision

In June 2023, Gopal, Donlon, And Peterpaul Held A Rally Criticizing The Supreme Court's Dobbs Decision. "New Jersey State Sen. Vin Gopal, who is running for reelection, and State Assembly candidates Margie Donlon and Luanne Peterpaul hold a rally marking one year since the U.S. Supreme Court 'Dobbs v. Jackson Women's Health Organization' decision." (*The Associated Press*, 6/23/23)

In 2023, Peterpaul's Joint Candidate Campaign Profile Posted Photos That Called For An End To Abortion Bans

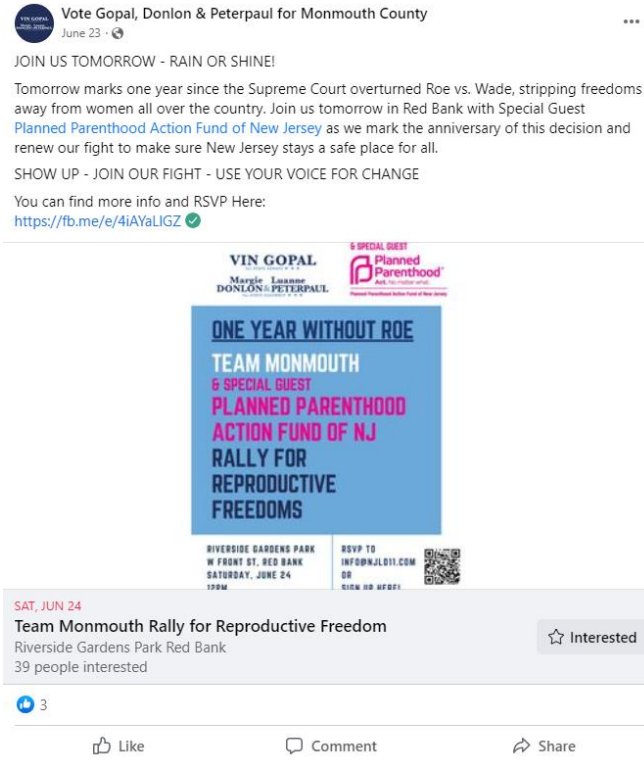
In June 2023, Peterpaul's Joint Candidate Campaign Profile Posted Photos That Called For An End To Abortion Bans. (Joint Candidate Campaign Profile, [Facebook](#), 6/24/23)



(Joint Candidate Campaign Profile, [Facebook](#), 6/24/23)

In 2023, Peterpaul's Joint Candidate Campaign Profile Posted That They Are Hosting An Event With Planned Parenthood Action Fund Of New Jersey

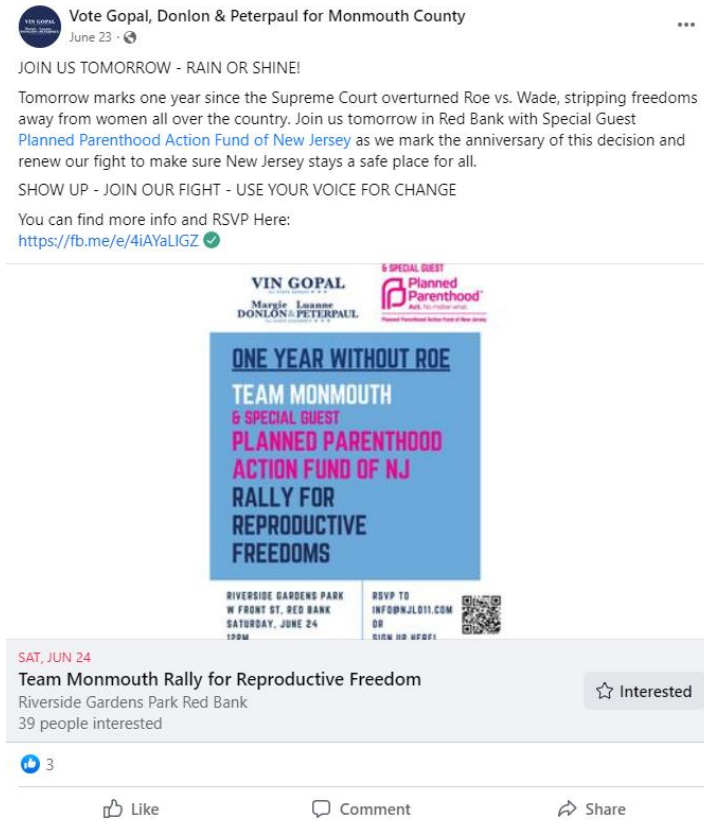
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(Joint Candidate Campaign Profile, [Facebook](#), 6/23/23)

In 2023, Peterpaul’s Joint Candidate Campaign Profile Posted That The Repeal Of Roe V. Wade Stripped Freedoms From Women All Over The Country

In June 2023, Peterpaul’s Joint Candidate Campaign Profile Posted That The Repeal Of Roe V. Wade Stripped Freedoms From Women All Over The Country. (Joint Candidate Campaign Profile, [Facebook](#), 6/23/23)



(Joint Candidate Campaign Profile, [Facebook](#), 6/23/23)

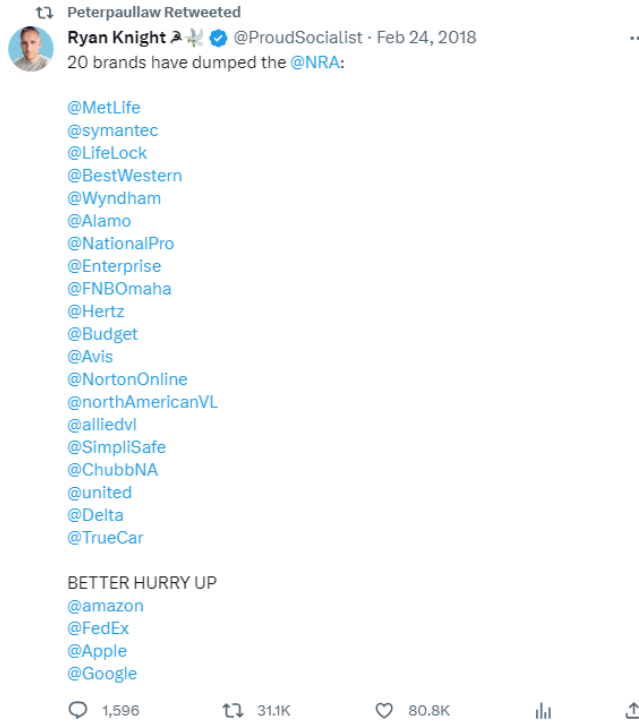
In 2023, Peterpaul’s Joint Candidate Campaign Profile Posted That It Is “Crucial To Maintaining The Right To Choose”

In June 2023, Peterpaul’s Joint Candidate Campaign Profile Posted That It Is “Crucial To Maintaining The Right To Choose”. (Joint Candidate Campaign Profile, [Facebook](#), 6/22/23)

ON SOCIAL MEDIA, PETERPAUL HAS PROMOTED CONTENT THAT SEEKS TO UNDERMINE THE SECOND AMENDMENT

In 2018, Peterpaul ‘Retweeted’ A Post That Praised Companies That Do Not Support The NRA

In February 2018, Peterpaul ‘Retweeted’ A Post That Praised Companies That Do Not Support The NRA. (Business Profile, [Twitter](#), 2/24/18)



(Business Profile, [Twitter](#), 2/24/18)

In 2018, Peterpaul ‘Liked’ A Tweet That Had A Picture Of The March 4 Our Lives

In March 2018, Peterpaul ‘Liked’ A Tweet That Had A Picture Of The March 4 Our Lives.

(Business Profile, [Twitter](#), 3/24/18)



(Business Profile, [Twitter](#), 3/24/18)

PETERPAUL IS A STAUNCH LGBTQ ACTIVIST

Peterpaul Was A Co-Author Of New Jersey's Anti-Bullying Bill Of Rights; “She Received The Lifetime Achievement Award From The LGBTQ Rights Section Of The New Jersey State Bar Association”

“Peterpaul Was A Co-Author Of New Jersey's Anti-Bullying Bill Of Rights, Signed Into Law By Gov. Chris Christie In 2011.” (Asbury Park Press, 12/13/18)

“She Received The Lifetime Achievement Award From The LGBTQ Rights Section Of The New Jersey State Bar Association.” (Asbury Park Press, 12/13/18)

On Social Media, Peterpaul Has Promoted Her Support For ‘Pride’ Events

In June 2023, Peterpaul’s Joint Candidate Campaign Profile Posted That They Are “Full Of PRIDE” At The Asbury Park Pride Parade. (Joint Candidate Campaign Profile, [Facebook](#), 6/5/23)



(Joint Candidate Campaign Profile, [Facebook](#), 6/5/23)

In June 2023, Peterpaul ‘Liked’ A Post Celebrating Pride Night At The Jersey Shore BlueClaws. (Professional Profile, [LinkedIn](#), Accessed 8/10/23)



(Professional Profile, [LinkedIn](#), Accessed 8/10/23)

In June 2023, Peterpaul ‘Liked’ A Post Celebrating Pride Night In The Park. (Professional Profile, [LinkedIn](#), Accessed 8/10/23)



(Professional Profile, [LinkedIn](#), Accessed 8/10/23)

PETERPAUL IS THE FORMER BOARD CHAIR OF THE PRO-LGBTQ ORGANIZATION KNOWN AS GARDEN STATE EQUALITY

In 2023, Garden State Equality, An Organization Peterpaul Used To Lead As Board Chair, Endorsed Her Candidacy

In 2023, Garden State Equality, An Organization Peterpaul Used To Lead As Board Chair, Endorsed Her Candidacy. “Garden State Equality, the state’s largest LGBTQ+ grassroots advocacy organization, has endorsed Luanne Peterpaul for a State Assembly seat in a hotly-contested 11th district race. Peterpaul, a former municipal court judge in Asbury Park and Long Branch, is seeking to unseat two freshman Republican assemblywomen, Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury). She is a former Garden State Equality board chair. “Luanne Peterpaul’s dedication to fighting for LGBTQ+ equality has been evident throughout her career,” said Jeannine Frisby LaRue, the Garden State Equality Board chair. “Luanne has

demonstrated her commitment to advancing the rights and well-being of our community. Her experience and passion make her an exceptional candidate, and we proudly endorse her as she seeks to represent the constituents of New Jersey Legislative District 11 and become the first openly-LGBTQ+ woman elected to the Assembly.” The endorsement comes on the first day of Pride Day 2023. Peterpaul is running with Democrat Margie Donlon, an Ocean Township councilwoman.” ([NJ Globe](#), 5/31/23)

- **“She Previously Served As Chair Of The Board For Garden State Equality – Where She Was Instrumental In Persuading The New Jersey State Legislature To Enact Bi-Partisan Anti-Bullying Legislation.”** ([Insider NJ](#), 2/4/23)

Peterpaul Was “Chair Of Garden State Equality's Action Fund Executive Committee.”

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“Kampf's wife, Luanne Peterpaul, is the chair of Garden State Equality's Action Fund Executive Committee, and the couple were among those in attendance at Moore and Sonnessa's wedding. "For someone who does not typically get very emotional in public, I was bawling my eyes out at their wedding," Kampf recalled. The premiere screening of "Love Wins" is the first of several Pride-themed, LGBT-supportive events scheduled for this coming weekend at the House of Independents.” (*Asbury Park Press*, 5/29/16)

In 2017, While Leading Garden State Equality, Peterpaul Organized A Rally Opposing The Trump Administration’s Transgender Troop Ban

In 2017, While Leading Garden State Equality, Peterpaul Organized A Rally Opposing The Trump Administration’s Transgender Troop Ban. “Brenda "Sue" Fulton, a former Army captain and West Point graduate, has a loud voice and is on the war path for President Donald Trump after his tweets banning transgender people in the armed services. The towering Asbury Park resident and past president of the LGBT-military organization SPARTA led a crowd in front of Club Paradise with a chant of "Ain't going to let Donald J. Trump turn me around," during a rally Saturday to support the rights of transgender people to serve openly in the military. Trump's tweets, delivered early Wednesday morning, said the "United States Government will not accept or allow transgender individuals to serve in any capacity in the U.S. Military," and has sent a charge through the Jersey Shore's LGBT community. "This administration is attacking those that are marginalized to get their way," said Luanne Peterpaul, chair of Garden State Equality's action fund executive committee, one of Saturday's rally organizers. "Well, Garden State Equality has a reinvigorated vision. We are not going to be silent, we are not going to stand still," Peterpaul said.” (*Asbury Park Press*, 7/30/17)

In 2014, While Leading Garden State Equality, Peterpaul Led The Organization In Hiring Transgender Activist Andy Bowen As The Organization’s Executive Director

In 2014, While Leading Garden State Equality, Peterpaul Led The Organization In Hiring Transgender Activist Andy Bowen As The Organization’s Executive Director. (*Montclair Times*, 7/31/14)

GSE tabs new executive di

BY ANDREW SEGEDIN
STAFF WRITER

The search is over. Andrea “Andy” Bowen has been selected as Garden State Equality’s new executive director.

Bowen’s selection culminates a national search, according to Luanne Peterpaul, action fund chair for GSE. Peterpaul cited Bowen’s enthusiasm, dynamic personality and commitment to moving GSE forward as factors for her selection.

“There are a few people in the world that have a special personality when she walks into a room, and she’s got it,” Peterpaul said of Bowen, who begins her leadership position tomorrow, Friday, of the Montclair-based GSE.

Prior to being hired to run GSE, Bowen told The Montclair Times that she had worked on behalf of iron workers, as a social worker and was a transgender activist in Washington, D.C. While in Washington, Bowen said that she worked on implementing policy for transgender

health needs, developing a local birth certificate law, and defending transgender women who were being thrown out of a Washington-area shelter.

Bowen described it as “amazing” that she is one of the nation’s first transgender executive directors of an advocacy organization, adding that she will look to pull from the work done by transgender leaders such as Transgender Health Empowerment co-founder Earline Budd and actress and activist Laverne Cox.

“It’s exciting to be among the first,” Bowen said. “I’m more excited to be among rather than the first, because it means that I’m part of a long line. That means longevity. It means I have people to draw from. It also means that we have a lot of ground to cover.”

As an activist in representing



**ANDREA
“ANDY”
BOWEN**

the T in LGBT – lesbian, gay, bisexual, and transgender – Bowen said that she is experienced in doing a lot with a little, often dependant on limited resources and volunteers in her previous efforts.

Bowen said that she made the transition from organized labor to transgender activism by going into the community and learning what was needed. The GSE’s new executive director said that she intends to approach New Jersey in a similar fashion, by traveling throughout the state and speaking to members of the LGBT community.

“I have my own notions of what needs to be done, but the real experts are out there,” Bowen said of this community.

After a decade of victories for GSE, including bringing marriage equality to New Jersey last year, Bowen said that it’s the “nitty-gritty that we have left over.” General education on LGBT issues will be a primary focus moving forward, according to Bowen.

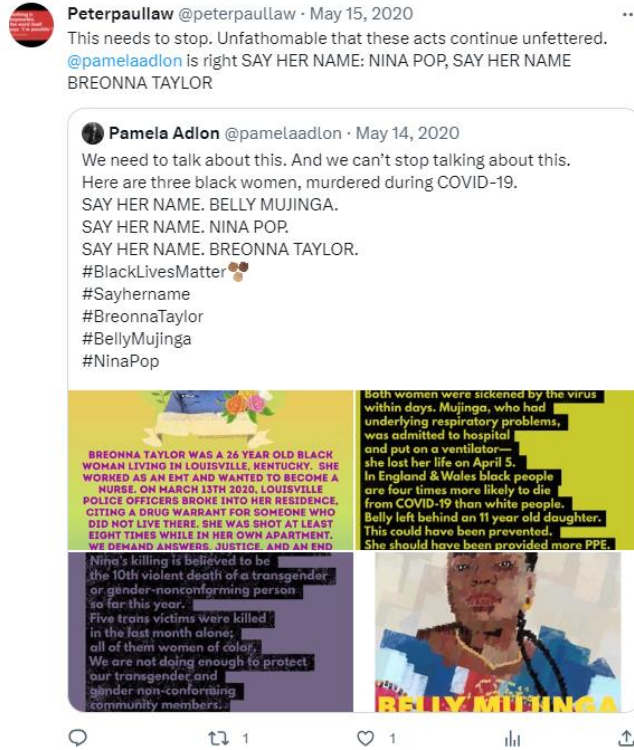
Like her predecessors, Bowen

(Montclair Times, 7/31/14)

ON SOCIAL MEDIA, PETERPAUL HAS PROMOTED DIVISIVE RACIAL CONTENT AND HAS INDICATED SUPPORT FOR BLACK LIVES MATTER

In 2020, Peterpaul Tweeted “Say Her Name Breonna Taylor”

In March 2020, Peterpaul Tweeted “Say Her Name Breonna Taylor”. (Business Profile, [Twitter](#), 5/15/20)



(Business Profile, [Twitter](#), 5/15/20)

In 2020, Peterpaul 'Liked' A Tweet That Supported The Black Lives Matter Movement

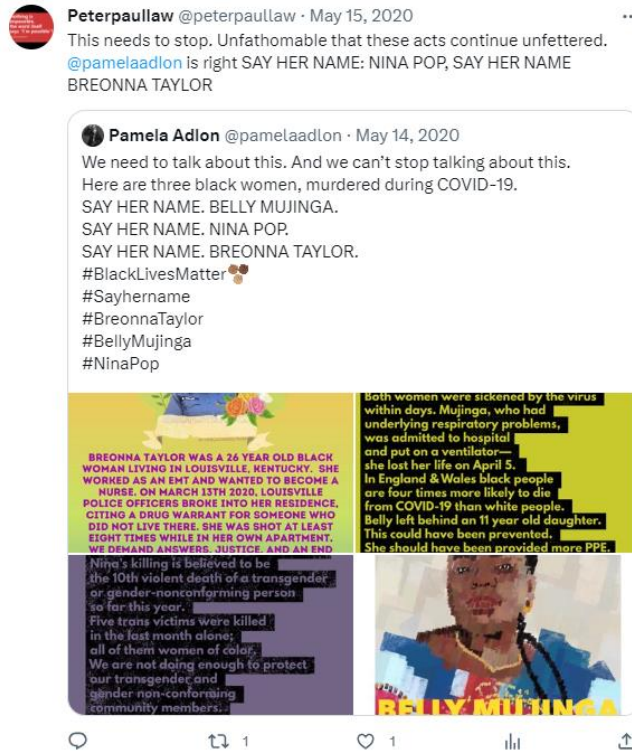
In May 2020, Peterpaul 'Liked' A Tweet That Supported The Black Lives Matter Movement. (Business Profile, [Twitter](#), 5/30/20)



(Business Profile, [Twitter](#), 5/30/20)

In 2020, Peterpaul ‘Retweeted’ A Post That Supports The Black Lives Matter Movement

In March 2020, Peterpaul ‘Retweeted’ A Post That Supports The Black Lives Matter Movement. (Business Profile, [Twitter](#), 5/15/20)

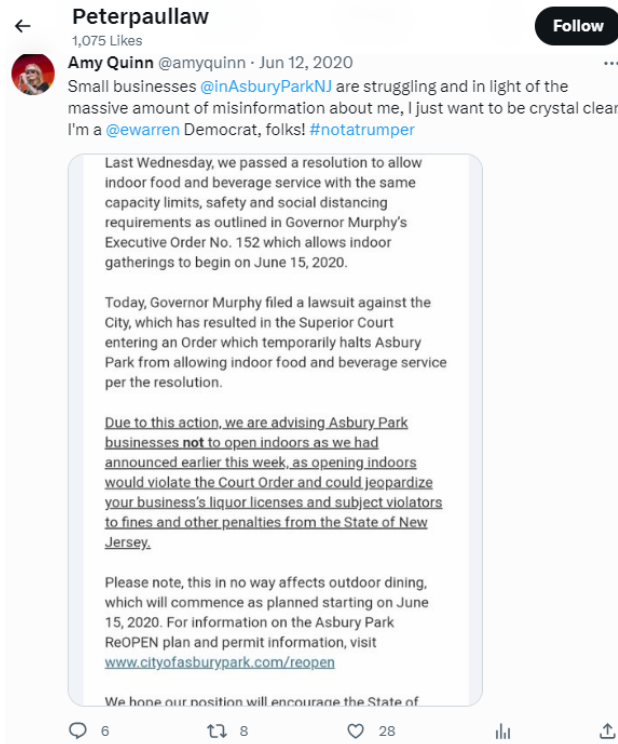


(Business Profile, [Twitter](#), 5/15/20)

ON SOCIAL MEDIA, PETERPAUL HAS INDICATED SUPPORT FOR SEVERAL PROMINENT LIBERAL FIGURES

On Social Media, Peterpaul Has Promoted Content Indicating Support For Elizabeth Warren

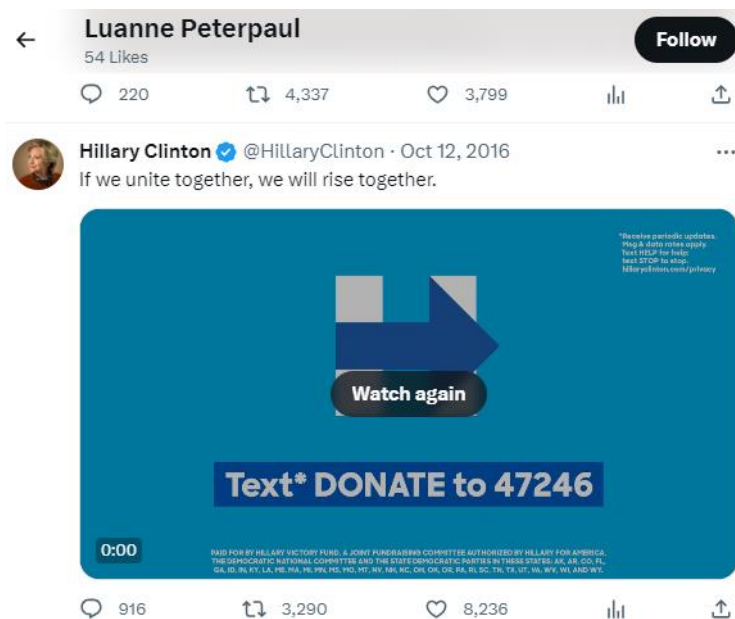
In June 2020, Peterpaul ‘Liked’ A Tweet That Stated I Am An Elizabeth Warren Democrat. (Business Profile, [Twitter](#), 6/12/20)



(Business Profile, [Twitter](#), 6/12/20)

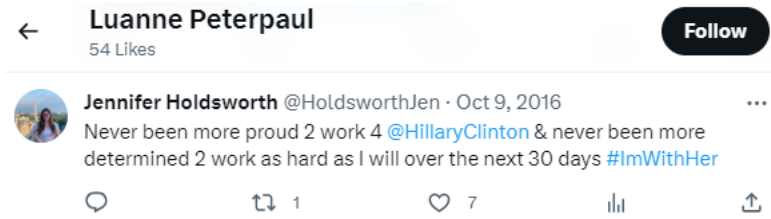
On Social Media, Peterpaul Has Promoted Content Indicating Support For Hillary Clinton

In October 2016, Peterpaul ‘Liked’ A Tweet That Supported Hillary Clinton For President. (Personal Profile, [Twitter](#), 10/12/16)



(Personal Profile, [Twitter](#), 10/12/16)

In October 2016, Peterpaul ‘Liked’ A Tweet That Praised A Person That Worked For The Hillary Clinton Campaign. (Personal Profile, [Twitter](#), 10/9/16)



(Personal Profile, [Twitter](#), 10/9/16)

On Social Media, Peterpaul Has Promoted Content Indicating Support For Joe Biden

In November 2020, Peterpaul ‘Liked’ A Tweet That Praised Joe Biden As Being The Next President. (Business Profile, [Twitter](#), 11/7/20)



(Business Profile, [Twitter](#), 11/7/20)

In August 2020, Peterpaul ‘Liked’ A Tweet That Endorsed Joe Biden For President. (Business Profile, [Twitter](#), 8/21/20)



(Business Profile, [Twitter](#), 8/21/20)

On Social Media, Peterpaul Has Promoted Content Indicating Support For Phil Murphy

In October 2017, Peterpaul “Retweeted” Support For Phil Murphy For Governor. (Personal Profile, [Twitter](#), 10/24/17)



(Personal Profile, [Twitter](#), 10/24/17)

In October 2017, Peterpaul “Retweeted” An Ad That Supported Phil Murphy For Governor. (Business Profile, [Twitter](#), 10/25/17)



(Business Profile, [Twitter](#), 10/25/17)

In July 2017, Peterpaul “Retweeted” That Phil Murphy Was Endorsed By Garden State Equality. (Business Profile, [Twitter](#), 7/5/17)



(Business Profile, [Twitter](#), 7/5/17)

ON SOCIAL MEDIA, PETERPAUL HAS PROMOTED PARTISAN CONTENT UNBECOMING OF A PUBLIC OFFICIAL

In 2016, Peterpaul ‘Liked’ A Post That Criticized Donald Trump For His Comments Toward Woman

In October 2016, Peterpaul ‘Liked’ A Post That Criticized Donald Trump For His Comments Toward Woman. (Personal Profile, [Twitter](#), 10/9/16)



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In 2016, Peterpaul ‘Liked’ A Tweet That Claimed Donald Trump Was A Misogynist And Racist

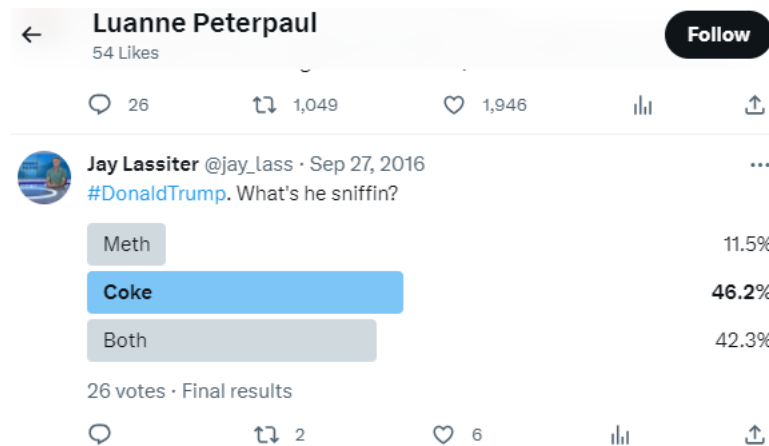
In October 2016, Peterpaul ‘Liked’ A Tweet That Claimed Donald Trump Was A Misogynist And Racist. (Personal Profile, [Twitter](#), 10/9/16)



(Personal Profile, [Twitter](#), 10/9/16)

In 2016, Peterpaul ‘Liked’ A Tweet That Claimed Trump Is Using Meth Or Coke Or Both

In September 2016, Peterpaul ‘Liked’ A Tweet That Claimed Trump Is Using Meth Or Coke Or Both. (Personal Profile, [Twitter](#), 9/27/16)



(Personal Profile, [Twitter](#), 9/27/16)

In 2016, Peterpaul ‘Liked’ A Tweet That Called Vice President Pence “A Mess Of Deplorables”

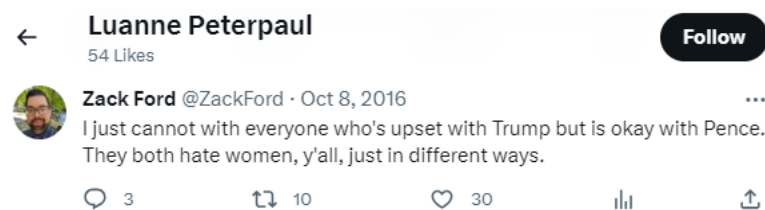
In October 2016, Peterpaul ‘Liked’ A Tweet That Called Vice President Pence “A Mess Of Deplorables”. (Personal Profile, [Twitter](#), 10/8/16)



(Personal Profile, [Twitter](#), 10/8/16)

In 2016, Peterpaul ‘Liked’ A Tweet That Claimed Vice President Pence Hates Women

In October 2016, Peterpaul ‘Liked’ A Tweet That Claimed Vice President Pence Hates Women. (Personal Profile, [Twitter](#), 10/8/16)



(Personal Profile, [Twitter](#), 10/8/16)

ON SOCIAL MEDIA, PETERPAUL HAS PROMOTED CONTENT THAT COULD BE CONSIDERED INAPPROPRIATE FOR A PUBLIC OFFICIAL

In 2020, Peterpaul ‘Liked’ A Tweet That Claimed There Was Pubic Hair On Justice Thomas’ Bible

In October 2020, Peterpaul ‘Liked’ A Tweet That Claimed There Was Pubic Hair On Justice Thomas’ Bible. (Business Profile, [Twitter](#), 10/26/20)



(Business Profile, [Twitter](#), 10/26/20)

In 2020, Peterpaul ‘Liked’ A Tweet That Uses Vulgar Language Directed At Lindsey Graham; “Bitch”

In October 2020, Peterpaul ‘Liked’ A Tweet That Uses Vulgar Language Directed At Lindsey Graham; “Bitch”. (Business Profile, [Twitter](#), 10/10/23)



(Business Profile, [Twitter](#), 10/10/23)

In 2020, Peterpaul ‘Liked’ A Tweet That Used The Word Fuck

In June 2020, Peterpaul ‘Liked’ A Tweet That Used The Word Fuck. (Business Profile, [Twitter](#), 6/21/20)



(Business Profile, [Twitter](#), 6/21/20)

APPENDIX A: ISSUES OF NOTE (BY SUBJECT AREA)

Below is a non-comprehensive reference section pertaining to Luanne Peterpaul's issues and policy positions of note. Any actionable material from this section has been incorporated into the prior narrative sections.

FISCAL AND ECONOMIC ISSUES

Labor

Union Associations

“The New Jersey Building And Construction Trades Council Is Taking Sides In A Competitive State Assembly Race In Monmouth County, Backing Two Democratic Challengers Over A Pair Of Republican Assemblywomen. The Union Group Voted To Endorse Margie Donlon And Luanne Peterpaul In The 11th District, Where First-Term Lawmakers Marilyn Piperno (R-Colts Neck) And Kim Eulner (R-Shrewsbury) Seek Re-Election.” “The New Jersey Building and Construction Trades Council is taking sides in a competitive State Assembly race in Monmouth County, backing two Democratic challengers over a pair of Republican assemblywomen. The union group voted to endorse Margie Donlon and Luanne Peterpaul in the 11th district, where first-term lawmakers Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury) seek re-election. The building trades group had skipped over the Assembly race in June when they made their initial round of endorsements, backing only State Sen. Vin Gopal (D-Long Branch) for a third term. Some key Democrats protested loudly to Bill Mullen, the NJBCTC president, who quickly assured that Donlon and Peterpaul would get support when they met a month later. That happened without objection on Monday. Still, it remains unclear why Mullen decided to skip the Assembly race in the first place. Mullen has not returned a call seeking an explanation. It’s been a rough cycle for Mullen, who is facing considerable criticism for supporting Democratic non-incumbents against two top officials of the International Union of Operating Engineers Local 825 in South Jersey legislative races: Latham Tiver for State Senate in the 8th and Matt Walker for Assembly in the 4th.” ([NJ Globe](#), 7/20/23)

In 2023, Donlon And Peterpaul Were Backed By The CWA. “The CWA made no Assembly endorsements in South Jersey, except for Majority Whip Carol Murphy (D-Mount Laurel), who is in the safely Democratic 7th district. A previous announcement listed endorsements for Democratic State Sen. Vin Gopal (D-Long Branch) and his running mates, Luanne Peterpaul and Margie Donlon. Peterpaul and Donlon face incumbents Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury). Four Democratic incumbents don’t have CWA endorsements: Richard Codey (D-Roseland), Renee Burgess (D-Irvington), Teresa Ruiz (D-Newark), and Brian P. Stack (D-Union City). “Everyone deserves the opportunity to work in a safe, respectful environment with fair wages and benefits,” said Dennis Trainor, Vice President for CWA District 1. “We are extremely proud to back these Assembly and Senate candidates, because we know they’ll be steadfast, strong supporters of working families and the labor movement here in New Jersey.”” ([NJ Globe](#), 6/15/23)

In 2023, Donlong, Peterpaul, And Gopal Were Backed By The AFL-CIO. “The AFL-CIO endorsed three Republican incumbents for re-election: State Sen. Vince Polistina (R-Egg Harbor Township), Assemblyman Don Guardian (R-Atlantic City), and Assemblywoman Claire Swift (R-Margate). The building trades declined to support anyone in the 2nd district. The endorsements in the 3rd district went to Democrat John Burzichelli, a former ten-term assemblyman who is challenging State Sen. Ed Durr (R-Logan); for the Assembly, the union is backing Democrats Heather Simmons, a Gloucester County freeholder, and Dave Bailey, Jr. against Assemblywoman Bethanne McCarthy Patrick (R-Mannington) and her running mate, Hopewell Township Committeeman Thomas Tedesco. In the 8th district, the AFL-CIO went Republican: Latham Tiver, a business agent for Operating Engineers Local 825 for Senate, and incumbents Brandon Umba (R-Medford) and Michael Torrissi, Jr. for Assembly. No endorsement was made for State Senate in the 1st district, where Republican Michael Testa, Jr. (R-Vineland) is seeking a third term, but AFL-CIO endorsements went to his running mates, Assemblymen Antwan McClellan (R-Ocean City) and Erik Simonson (R-Lower Township). The AFL-CIO went with Democratic challengers Luanne Peterpaul, a former municipal court judge, and Ocean Township Councilwoman Margie Donlon, in their bids to unseat freshmen Republican Assemblywoman Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury) in the 11th. State Sen. Vin Gopal (D-Long Branch) also won the union endorsement.” ([NJ Globe](#), 6/14/23)

In 2023, The Monmouth-Ocean County Building and Construction Trades Council Backed Donlon, Peterpaul, And Gopal. “The Monmouth-Ocean County Building and Construction Trades Council has endorsed two Democratic challengers for State Assembly in the 11th district and is asking the state building trades council to do the same. “The Monmouth-Ocean County Building Trades gives our full endorsement to Senator Vin Gopal’s running mates: Assembly candidates Dr. Margie Donlon and former Judge Luanne Peterpaul,” said Tom DeBartolo, the president of the local building trades council. The New Jersey Building and Construction Trades Council had endorsed only Gopal (D-Long Branch) last week; they didn’t take sides in the Assembly race, where Republicans Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury) are seeking second terms. “We are confident in speaking with them, they will join Senator Gopal as ardent supporters for the men and women of our building trades,” DeBartolo said. “We have sent a request to the state building trades to endorse both at their next council meeting.” Bill Mullen, the president of the New Jersey Building and Construction Trades, has been taking heat from both parties since he announced his legislative endorsements last week, with some union leaders telling the New Jersey Globe that Mullen botched the process. A new meeting is set for July.” ([NJ Globe](#), 6/13/23)

In 2023, The NJEA Backed Donlon, Peterpaul, And Gopal. “Early endorsements from New Jersey’s largest public employee union went to Democrats in some of the state’s most politically competitive legislative districts – and in some Democrats in safe districts — allowing the New Jersey Education Association PAC to make early financial contributions. The NJEA is backing State Sen. Vin Gopal (D-Long Branch), the chairman of the Senate Education Committee, for re-election to a third term in the 11th district, along with two Democratic Assembly challengers: Ocean Township Councilwoman Margie Donlon and former Asbury Park Municipal Court Judge Luanne Peterpaul, who are seeing to unseat GOP incumbents Marilyn Piperno (R-Colts Neck)

and Kim Eulner (R-Shrewsbury). The influential union also endorsed State Sen. Andrew Zwicker (D-South Brunswick), Assemblyman Roy Freiman (D-Hillsborough), and Democrat Mitchell Drulis in the 16th, and State Sen. Joseph Lagana (D-Paramus), Assembly Appropriations Committee Chair Lisa Swain (D-Fair Lawn) and Assemblyman Christopher Tully (D-Bergenfield) in the 38th.” ([NJ Globe](#), 4/26/23)

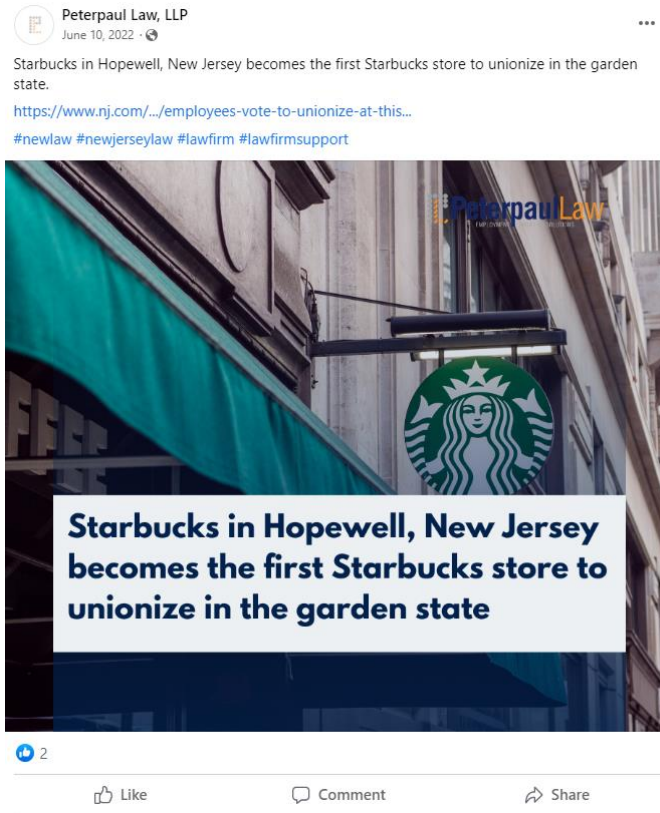
In April 2023, Peterpaul ‘Liked’ Tweet That Supported The NEA And Their Lobbying Of Congress. (Business Profile, [Twitter](#), 4/28/23)



(Business Profile, [Twitter](#), 4/28/23)

Starbucks

In June 2022, Peterpaul Praised The Unionization Of Starbucks. (Business Profile, [Facebook](#), 6/10/22)



(Business Profile, [Facebook](#), 6/10/22)

Minimum Wage

In May 2023, Peterpaul’s Joint Candidate Campaign Profile Called For A \$15 An Hour Minimum Wage. (Joint Candidate Campaign Profile, [Instagram](#), 5/15/23)



(Joint Candidate Campaign Profile, [Instagram](#), 5/15/23)

In February 2018, Peterpaul ‘Liked’ A Tweet That Called For \$15/Hour Minimum. (Business Profile, [Twitter](#), 2/26/18)



(Business Profile, [Twitter](#), 2/26/18)

ENERGY AND ENVIRONMENT

Clean Energy

In July 2023, Peterpaul’s Joint Candidate Campaign Profile Called To Codify 100% Clean Energy By 2035”. (Joint Candidate Campaign Profile, [Instagram](#), 7/7/23)



(Joint Candidate Campaign Profile, [Instagram](#), 7/7/23)

Climate Change

In June 2020, Peterpaul ‘Liked’ A Tweet That Supported “Climate Change Education Across Our K-12 Learning Standards”. (Business Profile, [Twitter](#), 6/3/20)



(Business Profile, [Twitter](#), 6/3/20)

Gas Stoves

In July 2023, Gopal, Donlon, and Peterpaul Announced Their Opposition To A Ban On Gas Stoves. “In addition to Burzichelli and Moriarty, four Democratic Assembly candidates – Heather Simmons and Dave Bailey in the 3rd district and Cody Miller and Dan Hutchison in the 4th – also signed on as opponents of the electric heating systems mandate. Updated at 1:42 PM: State Sen. Vin Gopal (D-Long Branch) and 11th district Democratic Assembly candidates Margie Donlon and Luanne Peterpaul today asked the BPU to shift their positions on gas stoves from mandates to just incentives to switch to electrification. “While I’m supportive of efforts to expand the utilization of clean energy in the state and to offer incentives to move in that direction, we still don’t have a full accounting of the consequences this rule could carry for New Jersey taxpayers,” stated Gopal. “We’ve made some important strides towards addressing New Jersey’s affordability crisis in recent years and any type of mandate could hurt working-class families in New Jersey.” ([NJ Globe](#), 7/26/23)

Environmentalist Associations

In 2023, Donlon, Peterpaul, and Gopal Were Endorsed By The NJ LCV. “New Jersey League of Conservation Voters (New Jersey LCV), the political voice for the environment, announced their slate of endorsements for the 2023 New Jersey legislative elections, encompassing 56 candidates across 24 districts of which 40% are women and 26% are candidates of color. New Jersey LCV works to elect viable candidates, without regard to party affiliation, who have demonstrated an active or affirmative willingness and capacity to advance New Jersey LCV’s pro-environment priorities. “We could not be prouder of the dedicated, pro-environment leaders in this round of legislative endorsements, and we look forward to electing

them to office and working together to build a more equitable and sustainable clean energy future for our children and grandchildren,” said Allison McLeod, Senior Policy Director, New Jersey LCV. “Codifying 100% clean energy by 2035, advancing offshore wind, and strengthening our democracy are all on the ballot. That’s why it’s important that every registered voter participate and support these environmental champions.” ([Insider NJ](#), 7/6/23)

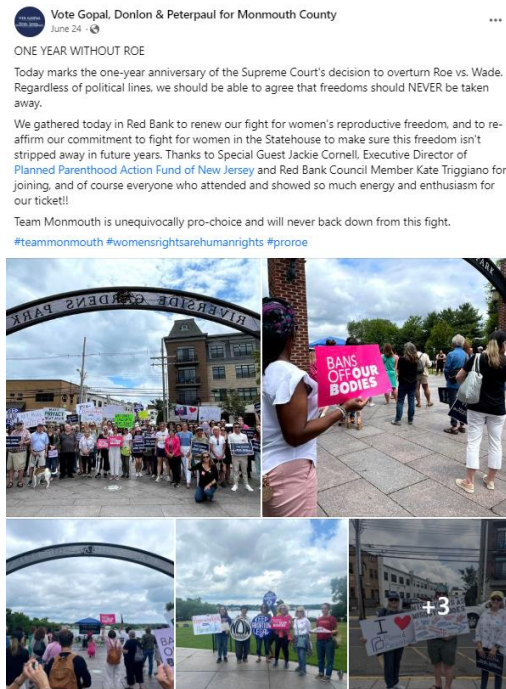
SOCIAL ISSUES

Abortion

Overall

In June 2023, Gopal, Donlon, And Peterpaul Held A Rally Criticizing The Supreme Court’s Dobbs Decision. “New Jersey State Sen. Vin Gopal, who is running for reelection, and State Assembly candidates Margie Donlon and Luanne Peterpaul hold a rally marking one year since the U.S. Supreme Court 'Dobbs v. Jackson Women's Health Organization' decision.” (*The Associated Press*, 6/23/23)

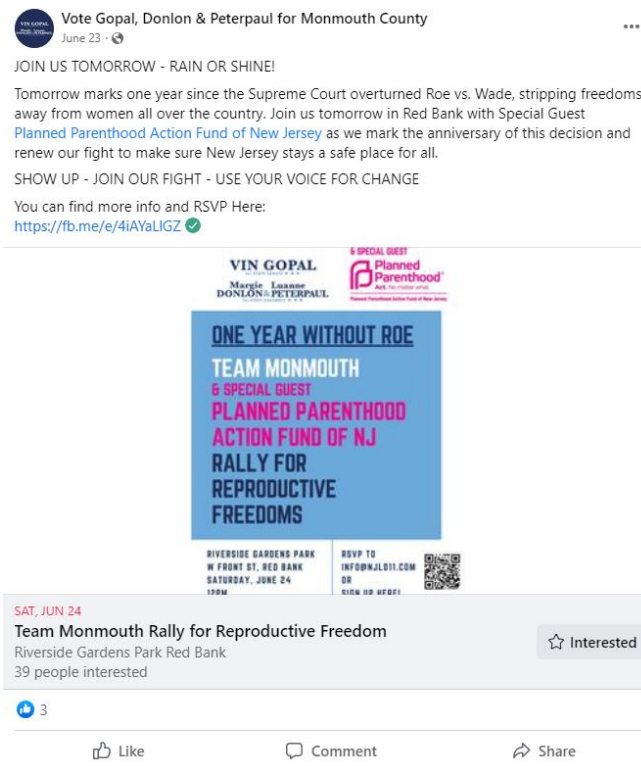
In June 2023, Peterpaul’s Joint Candidate Campaign Profile Posted Photos That Called For An End To Abortion Bans. (Joint Candidate Campaign Profile, [Facebook](#), 6/24/23)





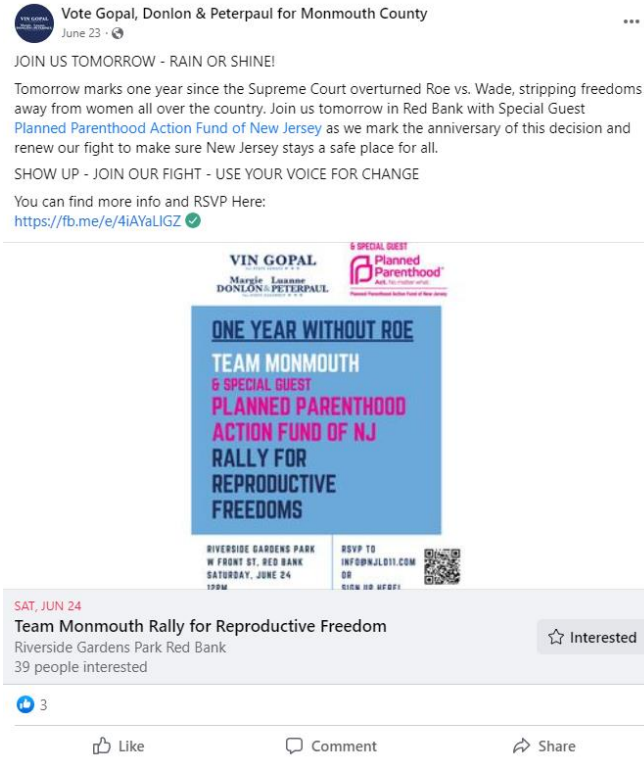
(Joint Candidate Campaign Profile, [Facebook](#), 6/24/23)

In June 2023, Peterpaul’s Joint Candidate Campaign Profile Posted That They Are Hosting An Event With Planned Parenthood Action Fund Of New Jersey. (Joint Candidate Campaign Profile, [Facebook](#), 6/23/23)



(Joint Candidate Campaign Profile, [Facebook](#), 6/23/23)

In June 2023, Peterpaul’s Joint Candidate Campaign Profile Posted That The Repeal Of Roe V. Wade Stripped Freedoms From Women All Over The Country. (Joint Candidate Campaign Profile, [Facebook](#), 6/23/23)

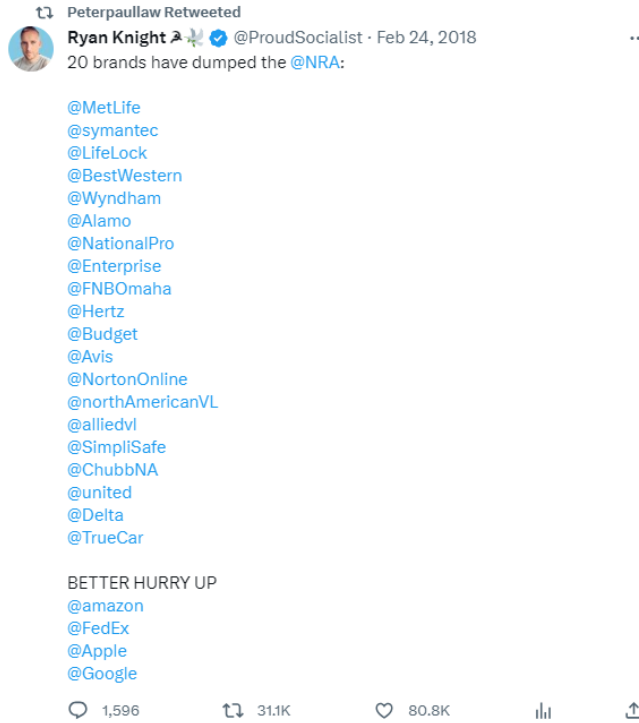


(Joint Candidate Campaign Profile, [Facebook](#), 6/23/23)

In June 2023, Peterpaul’s Joint Candidate Campaign Profile Posted That It Is “Crucial To Maintaining The Right To Choose”. (Joint Candidate Campaign Profile, [Facebook](#), 6/22/23)

Second Amendment

In February 2018, Peterpaul ‘Retweeted’ A Post That Praised Companies That Do Not Support The NRA. (Business Profile, [Twitter](#), 2/24/18)



(Business Profile, [Twitter](#), 2/24/18)

In March 2018, Peterpaul ‘Liked’ A Tweet That Had A Picture Of The March 4 Our Lives.
(Business Profile, [Twitter](#), 3/24/18)



(Business Profile, [Twitter](#), 3/24/18)

LGBTQ

Overall

“Peterpaul Was A Co-Author Of New Jersey's Anti-Bullying Bill Of Rights, Signed Into Law By Gov. Chris Christie In 2011.” (*Asbury Park Press*, 12/13/18)

“She Received The Lifetime Achievement Award From The LGBTQ Rights Section Of The New Jersey State Bar Association.” (*Asbury Park Press*, 12/13/18)

In June 2023, Peterpaul’s Joint Candidate Campaign Profile Posted That They Are “Full Of PRIDE” At The Asbury Park Pride Parade. (Joint Candidate Campaign Profile, [Facebook](#), 6/5/23)



(Joint Candidate Campaign Profile, [Facebook](#), 6/5/23)

In June 2023, Peterpaul ‘Liked’ A Post Celebrating Pride Night At The Jersey Shore BlueClaws. (Professional Profile, [LinkedIn](#), Accessed 8/10/23)



(Professional Profile, [LinkedIn](#), Accessed 8/10/23)

In June 2023, Peterpaul ‘Liked’ A Post Celebrating Pride Night In The Park. (Professional Profile, [LinkedIn](#), Accessed 8/10/23)



(Professional Profile, [LinkedIn](#), Accessed 8/10/23)

Pro-LGBTQ Associations – Garden State Equality

In 2023, Garden State Equality, An Organization Peterpaul Used To Lead As Board Chair, Endorsed Her Candidacy. “Garden State Equality, the state’s largest LGBTQ+ grassroots advocacy organization, has endorsed Luanne Peterpaul for a State Assembly seat in a hotly-contested 11th district race. Peterpaul, a former municipal court judge in Asbury Park and Long Branch, is seeking to unseat two freshman Republican assemblywomen, Marilyn Piperno (R-Colts Neck) and Kim Eulner (R-Shrewsbury). She is a former Garden State Equality board chair. “Luanne Peterpaul’s dedication to fighting for LGBTQ+ equality has been evident throughout her career,” said Jeannine Frisby LaRue, the Garden State Equality Board chair. “Luanne has demonstrated her commitment to advancing the rights and well-being of our community. Her experience and passion make her an exceptional candidate, and we proudly endorse her as she seeks to represent the constituents of New Jersey Legislative District 11 and become the first openly-LGBTQ+ woman elected to the Assembly.” The endorsement comes on the first day of Pride Day 2023. Peterpaul is running with Democrat Margie Donlon, an Ocean Township councilwoman.” ([NJ Globe](#), 5/31/23)

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Peterpaul Was “Chair Of Garden State Equality's Action Fund Executive Committee.”

“Kampf's wife, Luanne Peterpaul, is the chair of Garden State Equality's Action Fund Executive Committee, and the couple were among those in attendance at Moore and Sonnessa's wedding. "For someone who does not typically get very emotional in public, I was bawling my eyes out at their wedding," Kampf recalled. The premiere screening of "Love Wins" is the first of several Pride-themed, LGBT-supportive events scheduled for this coming weekend at the House of Independents.” *(Asbury Park Press, 5/29/16)*

In 2017, While Leading Garden State Equality, Peterpaul Organized A Rally Opposing The Trump Administration’s Transgender Troop Ban. “Brenda "Sue" Fulton, a former Army captain and West Point graduate, has a loud voice and is on the war path for President Donald Trump after his tweets banning transgender people in the armed services. The towering Asbury Park resident and past president of the LGBT-military organization SPARTA led a crowd in front of Club Paradise with a chant of "Ain't going to let Donald J. Trump turn me around," during a rally Saturday to support the rights of transgender people to serve openly in the military. Trump's tweets, delivered early Wednesday morning, said the "United States Government will not accept or allow transgender individuals to serve in any capacity in the U.S. Military," and has sent a charge through the Jersey Shore's LGBT community. "This administration is attacking those that are marginalized to get their way," said Luanne Peterpaul, chair of Garden State Equality's action fund executive committee, one of Saturday's rally organizers. "Well, Garden State Equality has a reinvigorated vision. We are not going to be silent, we are not going to stand still," Peterpaul said.” *(Asbury Park Press, 7/30/17)*

In 2014, While Leading Garden State Equality, Peterpaul Led The Organization In Hiring Transgender Activist Andy Bowen As The Organization’s Executive Director. *(Montclair Times, 7/31/14)*

GSE tabs new executive di

BY ANDREW SEGEDIN
STAFF WRITER

The search is over. Andrea “Andy” Bowen has been selected as Garden State Equality’s new executive director.

Bowen’s selection culminates a national search, according to Luanne Peterpaul, action fund chair for GSE. Peterpaul cited Bowen’s enthusiasm, dynamic personality and commitment to moving GSE forward as factors for her selection.

“There are a few people in the world that have a special personality when she walks into a room, and she’s got it,” Peterpaul said of Bowen, who begins her leadership position tomorrow, Friday, of the Montclair-based GSE.

Prior to being hired to run GSE, Bowen told The Montclair Times that she had worked on behalf of iron workers, as a social worker and was a transgender activist in Washington, D.C. While in Washington, Bowen said that she worked on implementing policy for transgender

health needs, developing a local birth certificate law, and defending transgender women who were being thrown out of a Washington-area shelter.

Bowen described it as “amazing” that she is one of the nation’s first transgender executive directors of an advocacy organization, adding that she will look to pull from the work done by transgender leaders such as Transgender Health Empowerment co-founder Earline Budd and actress and activist Laverne Cox.

“It’s exciting to be among the first,” Bowen said. “I’m more excited to be among rather than the first, because it means that I’m part of a long line. That means longevity. It means I have people to draw from. It also means that we have a lot of ground to cover.”

As an activist in representing



**ANDREA
“ANDY”
BOWEN**

the T in LGBT – lesbian, gay, bisexual, and transgender – Bowen said that she is experienced in doing a lot with a little, often dependant on limited resources and volunteers in her previous efforts.

Bowen said that she made the transition from organized labor to transgender activism by going into the community and learning what was needed. The GSE’s new executive director said that she intends to approach New Jersey in a similar fashion, by traveling throughout the state and speaking to members of the LGBT community.

“I have my own notions of what needs to be done, but the real experts are out there,” Bowen said of this community.

After a decade of victories for GSE, including bringing marriage equality to New Jersey last year, Bowen said that it’s the “nitty-gritty that we have left over.” General education on LGBT issues will be a primary focus moving forward, according to Bowen.

Like her predecessors, Bowen

(Montclair Times, 7/31/14)

Race

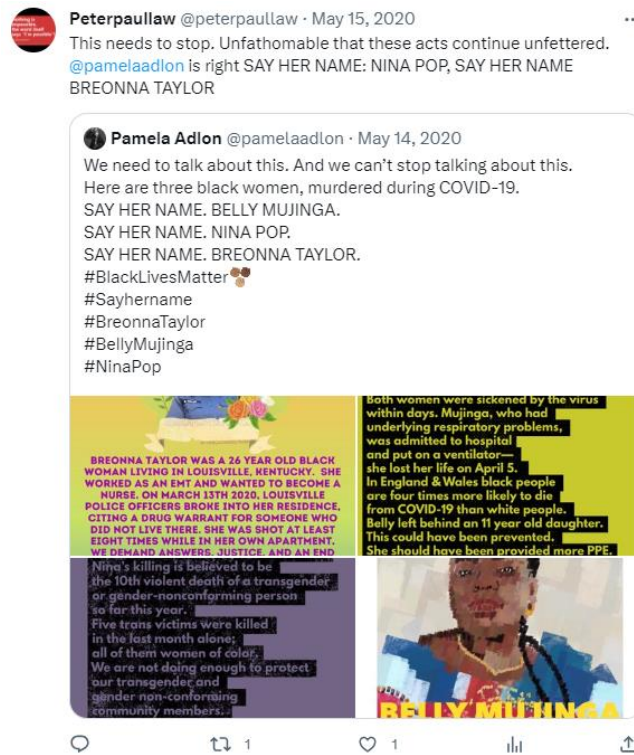
Black Lives Matter

In May 2020, Peterpaul ‘Liked’ A Tweet That Supported The Black Lives Matter Movement. (Business Profile, [Twitter](#), 5/30/20)



(Business Profile, [Twitter](#), 5/30/20)

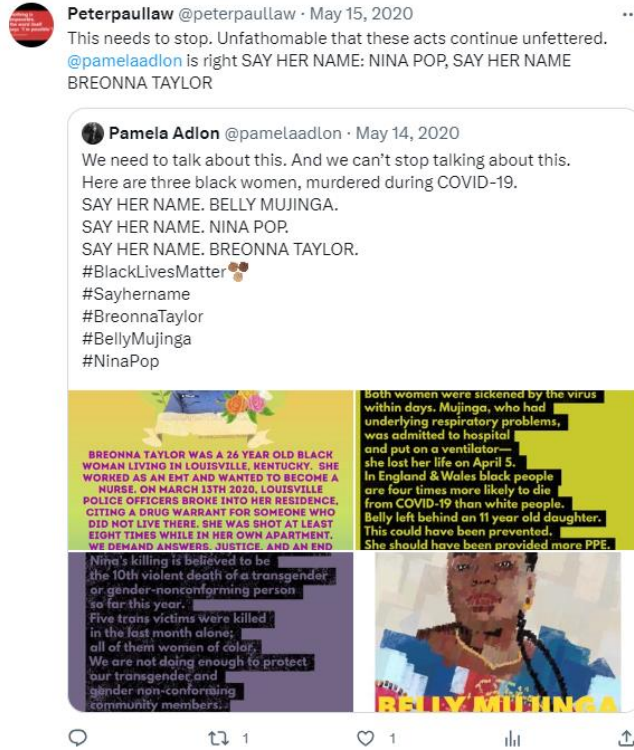
In March 2020, Peterpaul ‘Retweeted’ A Post That Supports The Black Lives Matter Movement. (Business Profile, [Twitter](#), 5/15/20)



(Business Profile, [Twitter](#), 5/15/20)

Breonna Taylor

In March 2020, Peterpaul Tweeted “Say Her Name Breonna Taylor”. (Business Profile, [Twitter](#), 5/15/20)



(Business Profile, [Twitter](#), 5/15/20)

POLITICAL

Democrat Affiliations

Elizabeth Warren

In June 2020, Peterpaul ‘Liked’ A Tweet That Stated I Am An Elizabeth Warren Democrat. (Business Profile, [Twitter](#), 6/12/20)



(Business Profile, [Twitter](#), 6/12/20)

Hillary Clinton

In October 2016, Peterpaul ‘Liked’ A Tweet That Supported Hillary Clinton For President. (Personal Profile, [Twitter](#), 10/12/16)



(Personal Profile, [Twitter](#), 10/12/16)

In October 2016, Peterpaul ‘Liked’ A Tweet That Praised A Person That Worked For The Hillary Clinton Campaign. (Personal Profile, [Twitter](#), 10/9/16)



(Personal Profile, [Twitter](#), 10/9/16)

Joe Biden

In November 2020, Peterpaul ‘Liked’ A Tweet That Praised Joe Biden As Being The Next President. (Business Profile, [Twitter](#), 11/7/20)



(Business Profile, [Twitter](#), 11/7/20)

In August 2020, Peterpaul ‘Liked’ A Tweet That Endorsed Joe Biden For President. (Business Profile, [Twitter](#), 8/21/20)



(Business Profile, [Twitter](#), 8/21/20)

Phil Murphy

In October 2017, Peterpaul “Retweeted” Support For Phil Murphy For Governor. (Personal Profile, [Twitter](#), 10/24/17)



(Personal Profile, [Twitter](#), 10/24/17)

In October 2017, Peterpaul “Retweeted” An Ad That Supported Phil Murphy For Governor. (Business Profile, [Twitter](#), 10/25/17)



(Business Profile, [Twitter](#), 10/25/17)

In July 2017, Peterpaul “Retweeted” That Phil Murphy Was Endorsed By Garden State Equality. (Business Profile, [Twitter](#), 7/5/17)



(Business Profile, [Twitter](#), 7/5/17)

Republican Affiliations

Chris Christie

In April 2023, Peterpaul ‘Liked’ A Photo Of Chris Christie. (Professional Profile, [LinkedIn](#), Accessed 8/10/23)



(Professional Profile, [LinkedIn](#), Accessed 8/10/23)

Donald Trump

In October 2016, Peterpaul ‘Liked’ A Post That Criticized Donald Trump For His Comments Toward Woman. (Personal Profile, [Twitter](#), 10/9/16)



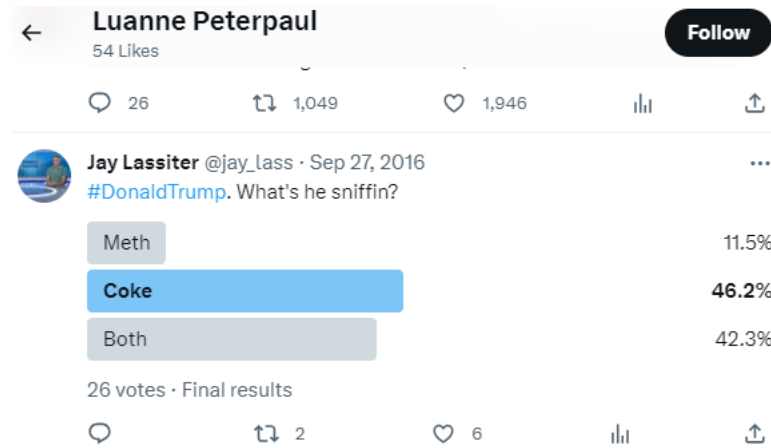
(Personal Profile, [Twitter](#), 10/9/16)

In October 2016, Peterpaul ‘Liked’ A Tweet That Claimed Donald Trump Was A Misogynist And Racist. (Personal Profile, [Twitter](#), 10/9/16)



(Personal Profile, [Twitter](#), 10/9/16)

In September 2016, Peterpaul ‘Liked’ A Tweet That Claimed Trump Is Using Meth Or Coke Or Both. (Personal Profile, [Twitter](#), 9/27/16)



(Personal Profile, [Twitter](#), 9/27/16)

Mike Pence

In October 2016, Peterpaul ‘Liked’ A Tweet That Called Vice President Pence “A Mess Of Deplorables”. (Personal Profile, [Twitter](#), 10/8/16)



(Personal Profile, [Twitter](#), 10/8/16)

In October 2016, Peterpaul ‘Liked’ A Tweet That Claimed Vice President Pence Hates Women. (Personal Profile, [Twitter](#), 10/8/16)



(Personal Profile, [Twitter](#), 10/8/16)

2020 Election

In November 2020, Peterpaul ‘Liked’ A Tweet That Called For Every Vote To Be Counted. (Business Profile, [Twitter](#), 11/4/20)



(Business Profile, [Twitter](#), 11/4/20)

In November 2020, Peterpaul ‘Liked’ A Tweet That Called For Every Vote To Be Counted.

(Business Profile, [Twitter](#), 11/4/20)



(Business Profile, [Twitter](#), 11/4/20)

In November 2020, Peterpaul ‘Liked’ A Tweet That Called For Every Vote To Be Counted.

(Business Profile, [Twitter](#), 11/4/20)



(Business Profile, [Twitter](#), 11/4/20)

Notable Endorsements

American Federation Of Teachers (New Jersey)

In July 2023, Peterpaul’s Joint Candidate Campaign Touted The Endorsement Of The New Jersey Chapter Of The American Federation Of Teachers.

(Joint Candidate Campaign Profile, [Twitter](#), 7/18/23)



(Joint Candidate Campaign Profile, [Twitter](#), 7/18/23)

In July 2023, Peterpaul’s Joint Candidate Campaign Profile Touted The Endorsement Of The New Jersey Chapter Of The American Federation Of Teachers. (Joint Candidate Campaign Profile, [Instagram](#), 7/18/23)



(Joint Candidate Campaign Profile, [Instagram](#), 7/18/23)

Communications Workers Of America

In May 2023, Peterpaul’s Joint Candidate Campaign Touted The Endorsement Of The Communications Workers Of America. (Joint Candidate Campaign Profile, [Twitter](#), 5/30/23)



Vin, Margie, & Luanne
@TeamMonmouth



ENDORSEMENT ALERT!

Thanks to @CWAUnion for your endorsement of our entire Democratic ticket!

Read full statement here: insidernj.com/.../cwa-announ...



1:40 PM · May 30, 2023 · 86 Views

(Joint Candidate Campaign Profile, [Twitter](#), 5/30/23)

Garden State Equality Action Fund

In June 2023, Peterpaul’s Joint Candidate Campaign Touted The Endorsement Of The Garden State Equality Action Fund. (Joint Candidate Campaign Profile, [Twitter](#), 6/1/23)

 **Vin, Margie, & Luanne**
@TeamMonmouth

We can think of no better way to kick off Pride month!
Thanks to @GSEquality for their special endorsement of Luanne Peterpaul for Assembly!

Read full statement here: [insidernj.com/press-release/...](https://insidernj.com/press-release/)

#TeamMonmouth #NJpride #loveisloveislove



2:39 PM · Jun 1, 2023 · 338 Views

(Joint Candidate Campaign Profile, [Twitter](#), 6/1/23)

In June 2023, Peterpaul’s Joint Candidate Campaign Profile Touted The Endorsement Of The Garden State Equality Action Fund. (Joint Candidate Campaign Profile, [Instagram](#), 6/1/23)



(Joint Candidate Campaign Profile, [Instagram](#), 6/1/23)

LGTO+ Victory Fund

In May 2023, Peterpaul Touted The Endorsement Of The LGBTQ+ Victory Fund. (Business Profile, [Tweeted](#), 5/9/23)



(Business Profile, [Tweeted](#), 5/9/23)

Monmouth County Education Association

In May 2023, Peterpaul Joint Candidate Campaign Touted The Endorsement Of The Monmouth County Education Association, A Chapter Organization Of The New Jersey Education Association. (Joint Candidate Campaign Profile, [Twitter](#), 5/9/23)



(Joint Candidate Campaign Profile, [Twitter](#), 5/9/23)

In May 2023, Peterpaul Joint Candidate Campaign Touted The Endorsement Of The Monmouth County Education Association, A Chapter Organization Of The New Jersey Education Association. (Joint Candidate Campaign Profile, [Instagram](#), 5/1/23)



(Joint Candidate Campaign Profile, [Instagram](#), 5/1/23)

New Jersey Building And Construction Trades Council

In July 2023, Peterpaul’s Joint Candidate Campaign Touted The Endorsement Of The New Jersey Building And Construction Trades Council. (Joint Candidate Campaign Profile, [Twitter](#), 7/20/23)



Vin, Margie, & Luanne
@TeamMonmouth



Honored that our entire team has earned the confidence of The New Jersey Building and Construction Trades Council! Thank you for your endorsement!

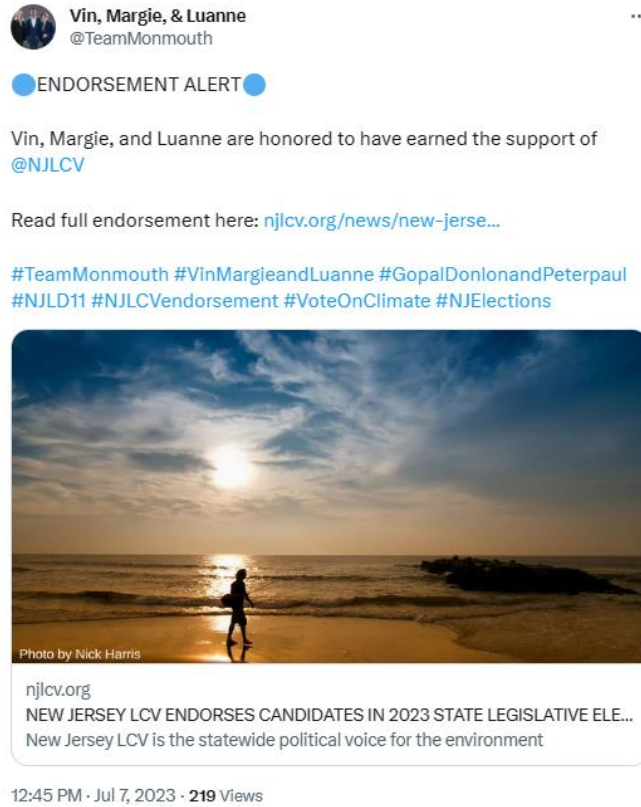


2:36 PM · Jul 20, 2023 · 1,434 Views

(Joint Candidate Campaign Profile, [Twitter](#), 7/20/23)

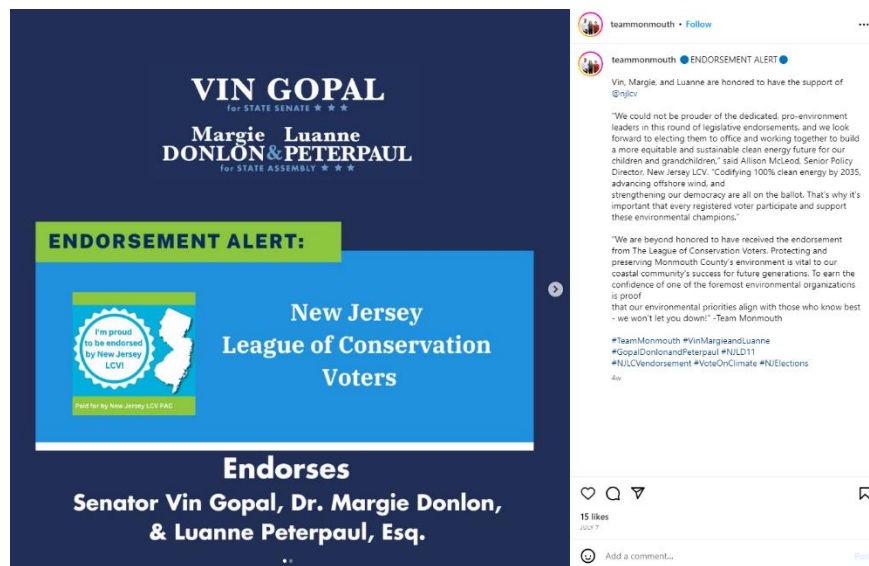
New Jersey League Of Conservation Voters

In July 2023, Peterpaul’s Joint Candidate Campaign Touted The Endorsement Of The New Jersey League Of Conservation Voters. (Joint Candidate Campaign Profile, [Twitter](#), 7/7/23)



(Joint Candidate Campaign Profile, [Twitter](#), 7/7/23)

In July 2023, Peterpaul’s Joint Candidate Campaign Profile Touted The Endorsement Of The New Jersey League Of Conservation Voters. (Joint Candidate Campaign Profile, [Instagram](#), 7/7/23)



(Joint Candidate Campaign Profile, [Instagram](#), 7/7/23)

New Jersey State AFL-CIO

In June 2023, Peterpaul’s Joint Candidate Campaign Touted The Endorsement Of The New Jersey State AFL-CIO. (Joint Candidate Campaign Profile, [Twitter](#), 6/15/23)



(Joint Candidate Campaign Profile, [Twitter](#), 6/15/23)

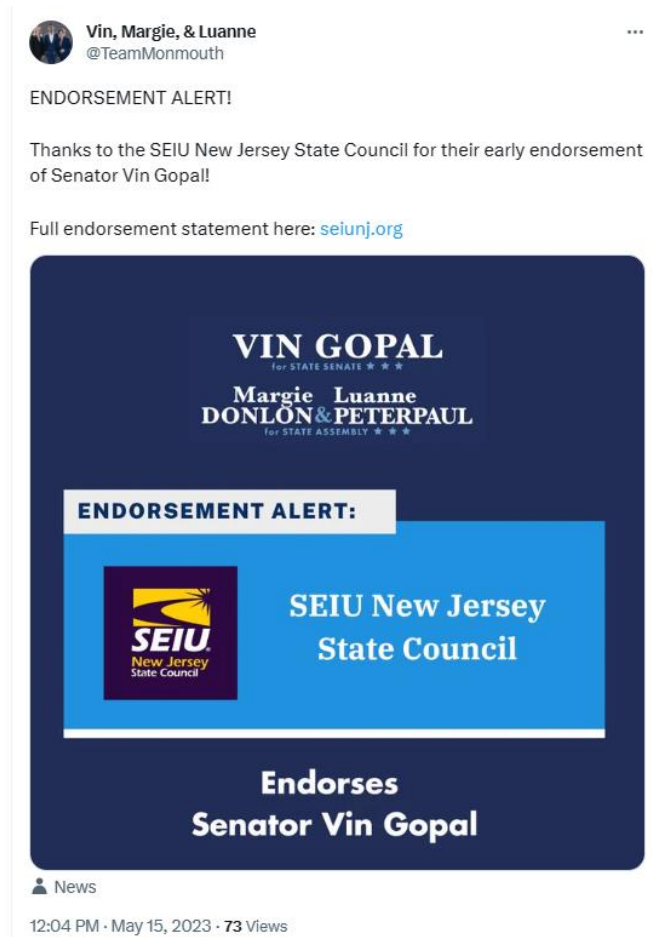
In June 2023, Peterpaul’s Joint Candidate Campaign Profile Touted The Endorsement Of The New Jersey State AFL-CIO. (Joint Candidate Campaign Profile, [Instagram](#), 6/15/23)



(Joint Candidate Campaign Profile, [Twitter](#), 6/15/23)

SEIU New Jersey State Council

In May 2023, Peterpaul’s Joint Candidate Campaign Touted The Endorsement Of The SEIU New Jersey State Council. (Joint Candidate Campaign Profile, [Twitter](#), 5/15/23)



(Joint Candidate Campaign Profile, [Twitter](#), 5/15/23)

In May 2023, Peterpaul’s Joint Candidate Campaign Profile Touted The Endorsement Of The SEIU New Jersey State Council. (Joint Candidate Campaign Profile, [Instagram](#), 5/15/23)



(Joint Candidate Campaign Profile, [Instagram](#), 5/15/23)

Additional Notable Social Media

Inappropriate

In October 2020, Peterpaul ‘Liked’ A Tweet That Claimed There Was Pubic Hair On Justice Thomas’ Bible. (Business Profile, [Twitter](#), 10/26/20)



(Business Profile, [Twitter](#), 10/26/20)

In October 2020, Peterpaul ‘Liked’ A Tweet That Uses Vulgar Language Directed At Lindsey Graham “Bitch”. (Business Profile, [Twitter](#), 10/10/23)



(Business Profile, [Twitter](#), 10/10/23)

In June 2020, Peterpaul ‘Liked’ A Tweet That Used The Word Fuck. (Business Profile, [Twitter](#), 6/21/20)



(Business Profile, [Twitter](#), 6/21/20)

PERSONAL

Additional Background Notes

“A Graduate Of Duquesne University, And Seton Hall School Of Law, She Lives With Her Wife Robin In Long Branch.” ([Insider NJ](#), 2/4/23)

Civic Legal Career

“Judge Luanne Peterpaul (Ret.), A Former County Prosecutor, Has Tried A Number Of Successful Cases Against Criminals – Which Includes Those Who Have Committed Thefts And Homicide.” ([Insider NJ](#), 2/4/23)

“Most Recently, She Served As A Municipal Judge For The City Of Long Branch And For The City Of Asbury Park. She Was Named By The New Jersey Law Journal List As One Of The Diverse Attorneys Of The Year.” “Most recently, she served as a Municipal Judge for the City of Long Branch and for the City of Asbury Park. She was named by the New Jersey Law Journal list as one of the Diverse Attorneys of the Year. Peterpaul has appeared on Court TV as a guest panelist and on other news outlets as a legal analyst.” ([Insider NJ](#), 2/4/23)

- **“Mayor John Pallone Has Nominated Luanne M. Peterpaul, A State Leader For LGBTQ Rights, As The City's Municipal Court Judge.”** “Mayor John Pallone has nominated Luanne M. Peterpaul, a state leader for LGBTQ rights, as the city's municipal court judge. Peterpaul, whose is expected to be confirmed by the City Council on

Wednesday, served 12 years on the board of Garden State Equality, one of the state's leading civil rights groups, chairing the Action Fund. Her work on the board was a driving force behind marriage equality in New Jersey, according to a statement from Long Branch's administration. "I believe Luanne will be a welcome selection for the City of Long Branch. Her background demonstrates extensive knowledge of the law," Pallone said. "She is an advocate of social justice and her dedication to these causes are very apparent." (Asbury Park Press, 12/13/18)

In 2022, Peterpaul Suspended A \$2,000 Fine Against The Owner Of A Sober House Who Pleaded Guilty To Operating Without a License Noting She Was “Extremely Sympathetic” To People Recovering From Substance Abuse. “A three-year court fight ended Wednesday, with the owner of a sober house on Chelton Way pleading guilty to operating without a license, but the legal odyssey is not over. Richard Braha, a recovering addict, opened his sober house in the summer of 2019 without a license from the state of New Jersey to run a Cooperative Sober Living Residence, or sober house. Braha was given a summons by the city on Aug. 30, 2019, for operating without a license. However, Braha had applied for the license 11 days before, and eventually did receive the license from the state to run the home this past February. The home, located in a residential neighborhood, provides a safe haven for recovering addicts and alcoholics to get back on their feet after completing rehab. Municipal Court Judge Luanne Peterpaul said the court is "extremely sympathetic" to people recovering from substance abuse. As such, Peterpaul suspended the \$2,000 fine associated with the summons. Braha had to pay \$33 in court fees. "This is all we wanted. When they opened they didn't have their license. They had to go through the process," City Attorney Louis Rainone said. The city does have other sober houses operating that are licensed and have zoning permits, according to city officials. While Braha can keep his sober house open, he must go before the city's Zoning Board and get a permit to operate legally in the city, which prohibits rooming and boarding houses.” (Asbury Park Press, 9/1/22)

Defense Attorney

In 1987, Peterpaul Was Known To Represent John Paschal Who Was Charged In A Statewide Auto Theft Scam; Paschal Claimed The Charges Should Be Dismissed Because He Was Acting As An Informant. (Daily Record, 2/26/87)

<p>Daily Record Courthouse Writer</p> <p>John Paschal, a former Mine Hill school board president charged in a statewide auto theft scam, is demanding the charges be dismissed, contending he was aiding a State Police investigation and acting with official sanction.</p> <p>"It is now quite apparent that this indictment arises from occasions when Mr. Paschal feigned participation in criminal activity in order to help the police investigate and arrest their target at an appropriate time," wrote Luanne Peterpaul, Paschal's attorney, in court documents.</p> <p>The documents, demanding the dismissal</p>	<p>of a 1985 indictment against Paschal, 50, were filed with the Morris County Clerk's Office yesterday.</p> <p>The documents consisted of written arguments that followed objections and testimony presented by Paschal's attorney in two days of closed hearings last month before Superior Court Judge Donald Collester in Morristown.</p> <p>First Assistant Prosecutor John O'Reilly declined comment yesterday, but said Collester is scheduled to hear final arguments and decide the issue on March 6.</p> <p>Thomas Gallagher, a spokesman for the</p>	<p>State Police, also declined comment on the Paschal case.</p> <p>The documents allege that for the past 25 years Paschal had acted as an informant for the FBI as well as the State Police — the agency that eventually brought charges that led to his indictment.</p> <p>The Morris County indictment charges Paschal and John Sarmiento, 33, of Ridgefield, with conspiracy, four counts of receiving stolen property and four counts of violating motor vehicle certification laws.</p> <p>The charges allege they legitimately purchased junk cars, but used state motor vehi-</p>
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(Daily Record, 2/26/87)

- **However, It Was Unclear If Paschal Was Still Acting As A State Police Informant Or If The Relationship Had Ever Been Severed.** *(Daily Record, 2/26/87)*

ft charges

cle identification numbers on them to improperly gain titles between April 1980 and February 1983 for stolen cars that were to be sold for profit.

The documents refer to the testimony of two State Police investigators and one FBI agent, who stated that Paschal was an unpaid informant whose help led to numerous arrests involving car thefts and auto rings and resulted in the recovery of 80 to 100 cars.

But disputed is whether Paschal was acting under the direction of State Police between 1980 and 1983, when allegedly stolen cars and parts were brought to his Nick's Auto Parts shop on Thomastown Road, Mine Hill. Paschal says he was working at the direction of Thomas Cornelissen, a State Police detective, when the alleged scam was in progress.

But according to portions of closed-hearing testimony included in defense documents, Cornelissen contends he severed the informant relationship with Paschal in the early 1980s when Paschal supposedly tried to bribe him.

Peterpaul alleges testimony by another State Police detective at the time, Bernard Kelly, and FBI Agent William Murphy indicate Paschal continued to aid police investigations in the early 1980s and Cornelissen never mentioned he severed the informant relationship.

(Daily Record, 2/26/87)

- **In May 1987, Paschal Pleaded Guilty To Evading More Than \$69,000 In Taxes On His 1981 Federal Income Tax Return.** *(Daily Record, 5/29/87)*

Morris man guilty of evading taxes

CAMDEN — A Morris County man pleaded guilty in federal court yesterday to evading more than \$69,000 in taxes on a joint 1981 federal income tax return.

John G. Paschal, 51, of Mine Hill, admitted he underreported his 1981 income by \$146,000.

According to court papers, Paschal had reported income of only \$11,199, when in actuality his income was \$157,463.

(Daily Record, 5/29/87)

- **In August 1987, A State Judge Refused To Drop The Case Against Paschal Regarding Auto Theft.** *(Daily Record, 8/11/87)*

A state judge has refused to dismiss theft charges against a former Mine Hill school board president who says he aided State Police and acted with official sanction when he was part of a statewide auto-theft scam.

"Even accepting the position of the defendant that he was an informer and had been one over a period of some 20 or 25 years, it by no means establishes that he was entitled to some sort of 'free pass' respecting criminal conduct," wrote Superior Court Judge Donald Collester, rejecting a demand to dismiss charges against 50-year-old John Paschal.

The opinion, released by Collester's office in Morristown yesterday, follows dismissal arguments at closed hearings in January.

(Daily Record, 8/11/87)

- **However, In 1989, A Judge Dismissed Criminal Charges Against Paschal After Ruling That An Invalid Search Warrant Had Led To The Charges.** *(Daily Record, 7/7/89)*

MORRISTOWN — A Superior Court judge, citing an invalid search warrant, has dismissed criminal charges against a Mine Hill resident linked to an alleged statewide auto theft scam.

In an order signed June 30 and filed yesterday, Judge Donald Collester dismissed a 1985 indictment against John Paschal, 52, and an alleged cohort, John Sarmiento, 34, of Ridgefield.

Collester said State Police acted on state evidence when they raided Paschal's auto parts yard on Thomastown Road in Mine Hill on July 15, 1980. The warrant used by the officers was based on information that was months old.

Paschal and Sarmiento were charged with using motor vehicle identification numbers on junk cars to improperly gain titles for stolen cars that were to be sold.

The alleged scam went on between April 1980 and February

(Daily Record, 7/7/89)

In 1987, Peterpaul Was Known To Represent Ronald Prestifilippo, A Codefendant With George Pepe Who Was Charged As A Member Of A Northern New Jersey Cocaine Distribution Ring. *(The Record, 5/14/87)*

Were drug defendant and

Knight-Ridder News Service

CAMDEN — He allegedly left flowers on her red Porsche. At the luncheonette across the street, she allegedly left a him note with her phone number.

Although it may seem like the makings of a love story, the tale of George Pepe and Patricia Hand will be played out in a federal courtroom in Camden later this month.

Pepe, of Paterson, is one of seven persons who in February went

on trial as alleged members of a northern New Jersey cocaine-distribution ring. Ms. Hand, of Millville, was one of the jurors selected to hear their case in federal court in Camden.

When the trial ended Apr. 3, after nearly two months, five of Pepe's codefendants were convicted and one was acquitted. The jury was unable to agree on a verdict for Pepe, meaning at least one of the 12 jurors had held out for acquittal.

After the trial, Pepe's attorney

asked U.S. District Judge John F. Gerry to throw out the charge against his client rather than permit a retrial.

But a hearing on that request was postponed last month when Luanne Peterpaul, the attorney for Pepe's codefendant Ronald Prestifilippo, alleged in court papers that Pepe and Ms. Hand had improper contact during the trial. As a result the jury that convicted Prestifilippo was tainted, Ms. Peterpaul says, and her client should be granted a new trial.

(The Record, 5/14/87)

In 2001, Mary Jean Lioy Sued Union County College (UCC) Alleging She Was Subject To Harassment, Retaliation, And Hostility After She Complained A Colleague Was Denied Tenure In 1997 Because She Was A Woman. *(Home News, 4/26/01)*

UNION COUNTY: A hearing tomorrow on a biology professor's lawsuit against Union County College will test whether the state's so-called Whistle-blower Law applies to tenured educators.

Mary Jean Lioy of Cranford is suing UCC and professor William Dunscombe, head of the college's biology department, in a case that is being closely watched by the New Jersey Education Association and other unions representing tenured educators.

Lioy, a professor at the Cranford-based college since 1976 with expertise in microbiology, alleges in the suit filed in Superior Court, Elizabeth, that Dunscombe subjected her to harassment, retaliation and hostility after she complained that a colleague was denied tenure in 1997 because she is a woman and after questioning the use

(Home News, 4/26/01)

- **Peterpaul Represented UCC And Claimed Lioy And Her Superior Had A Personality Conflict That Was Blown Out Of Proportion. *(Home News, 4/26/01)***

The lawsuit, filed by Linda Wong and Dan Fleming of the Edison law firm Wong Fleming, alleges that the harassment and retaliation included denying Liroy teaching supplies and grant money she was entitled to, using profane language about her, excluding her from meetings, canceling her classes and, in one instance, bringing in a female stripper to perform for faculty members.

The college denies Liroy's allegations. Luanne Peterpaul, an attorney for UCC, said the situation amounts to "a personality conflict between two individuals that was totally blown out of proportion." Simply put, she said, the two don't like each other.

Peterpaul said no stripper ever set foot on campus. She said a group of people once brought in a dancer as a joke for Dunscombe's birthday, but he had no knowledge of the incident ahead of time, and the college did not condone it and later reprimanded those responsible for it.

Dunscombe's attorney, Rob-

(Home News, 4/26/01)

In 2015, Peterpaul Represented The Smith Group, Whose Restaurants Paid Back Overtime To Workers Following A Federal Investigation For Violations Of The Fair Labor Standards Act. (Asbury Park Press, 7/7/15)

ASBURY PARK — Porta, the Brickwall Tavern and Dining Room and three other restaurants owned by the city-based Smith Group are paying back overtime to workers following a federal investigation, the Asbury Park Press has learned.

An attorney for the restaurant group said the investigation is complete and the "amicable resolution" between the restaurants and workers is being made final.

A spokeswoman for the U.S. Department of Labor confirmed that an investigation had been launched but said she could discuss few details because it was an open case.

The other restaurants targeted by the Department of Labor's Wage and Hour Division are the Asbury Park eateries Pascal & Sabine, Goldie's — no longer in business — and The Monk Room in Newark.

The division began the investigation in August, Labor Department spokeswoman Lenore Uddyback-Fortson said. If the Wage and Hour Division investigates, it's for possible violations of the Fair Labor Standards Act, "which covers overtime and minimum wage," she said.

The company is now issuing checks for back overtime pay to employees, said the Smith Group's Red Bank-based attorney, Luanne M. Peterpaul.

(Asbury Park Press, 7/7/15)