

COMPLAINT TO THE FEDERAL ELECTIONS COMMISSION

CALEB L. MCGILLVARY) COMPLAINT NO.
COMPLAINANT)
)
V.)
)
	MUR 8192
ROBERT MENENDEZ)
NETFLIX, THEODORE)
ROMANKOW, PHIL MURPHY)
KARA KOPACH, ANTHONY)
TALERICO, JR., LILLIAN)
BURRY, REGINA MCGRADY,)
TRACY BUCKLEY, JAY)
COFFEY, MATTHEW J)
TEVENAN, RIKER DANZIG,)
LLP, STEVEN GALLO,)
STEPHEN ZEGAR, JAMERA)
SIRMANS, JORGE SANTOS,)
ROBERT A KIRSCH, KAREN)
M. CASSIDY, CHRISTINE P.)
O'HEARN, RENEE MARIE)
BUMB, THE NEW JERSEY)
SENATE, THE NEW JERSEY)
LEGISLATURE, THE NEW)
JERSEY STATE ASSEMBLY,)
THE NJ OFFICE OF THE)
GOVERNOR, RAW TV, BRUCE)
STEADMAN, LINDA D)
STENDER, NICHOLAS)
SCUTARI, NEW JERSEY)
ASSOCIATION OF JUSTICE,)
NEW JERSEY ASSOCIATION)
OF JUSTICE PAC,)
JAVERBAUM WURGAFT,)
GERALD H BAKER, MICHAEL)
GALPERN, FRANCISCO J)

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 LIDE, BRYAN ROBERTS,)
 JOHN A SAKSON, DOMENIC)
 SANGINITI, LEVINSON)
 AXELROD, RICHARD)
 MARCOLUS, CHRISTOPHER)
 DEANGELO, MICHAEL)
 FUSCO, KIMBERLY GOZSA,)
 BRETT GREINER, ADAM)
 ROTHENBERG, LUM DRASCO)
 POSITAN, STEPHEN)
 EISENSTEIN, WAYNE)
 POSITAN, STARR GERN)
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 ERICA AVONDOGLIO,)
 MICHAEL T BUONOCORE,)
 JAMES LYNCH, NEIL)
 WEINER, STAVOLA)
 CONSTRUCTION MATERIALS,))
 ELIZABETH STAVOLA, DI)
 GROUP ARCHITECTURE,)
 VINCENT MYERS, RICHARD D))
 ALEDERISO, ROBERT RYAN,)
 JEFFREY VENEZIA,)
 WEILKOTZ & CO., LLC,)
 MATTHEW WEILKOTZ,)
 STEVEN WEILKOTZ, CATHY)
 L WALDOR, MADELINE COX)
 ARLEO, JOHN DOE 1,)
 JOHN DOE 2, JOHN DOE 3,)
 JOHN DOE 4, ABC, INC. 1,)

ABC, INC. 2, ABC, INC. 3,)
ABC, INC. 4)
RESPONDENTS)

COMPLAINT

I. PARTIES IN THIS COMPLAINTA. COMPLAINANT

NAME: Caleb L. McGillvary
 STREET ADDRESS: #1222665/SBI#102317G NJSP Po Box 861
 COUNTY, CITY: Mercer, Trenton
 STATE & ZIP CODE: New Jersey 08625
 TELEPHONE NUMBER: N/A

B. RESPONDENTSRESPONDENT NO. 1

NAME: ROBERT MENENDEZ, INDIVIDUALLY AND
 IN HIS OFFICE AS US SENATOR
 STREET ADDRESS: 210 HUDSON ST. HARBORSIDE 3, STE 100
 COUNTY, CITY: HUDSON, JERSEY CITY
 STATE & ZIP CODE: NEW JERSEY, 07311
 TELEPHONE NUMBER: Unknown

RESPONDENT NO. 2

NAME: NETFLIX
 STREET ADDRESS: 100 Winchester Circle
 COUNTY, CITY: Los Gatos
 STATE & ZIP CODE: California 95032
 TELEPHONE NUMBER: Unknown

RESPONDENT NO. 3

NAME: THEODORE ROMANKOW, INDIVIDUALLY AND IN
 HIS OFFICES AS UNION COUNTY PROSECUTOR, UNION
 COUNTY IMPROVEMENT AUTHORITY, WATERFRONT
 COMMISSION, AND UNION COUNTY BOARD OF CHOSEN
 FREEHOLDERS

STREET ADDRESS: [REDACTED]
 COUNTY, CITY: UNION, BERKELEY HEIGHTS
 STATE & ZIP CODE: NEW JERSEY 07922
 TELEPHONE NUMBER: N/A

RESPONDENT NO. 4

NAME: PHIL MURPHY, INDIVIDUALLY AND IN HIS OFFICE
AS NJ GOVERNOR

STREET ADDRESS: THE STATE HOUSE

COUNTY, CITY: MERCER, TRENTON

STATE & ZIP CODE: NEW JERSEY 08625-0001

TELEPHONE NUMBER: N/A

RESPONDENT NO. 5

NAME: KARA KOPACH, INDIVIDUALLY AND IN HER OFFICE
AS FMERA OFFICER

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MONMOUTH, MONMOUTH BEACH

STATE & ZIP CODE: NEW JERSEY 07750

TELEPHONE NUMBER: N/A

RESPONDENT NO. 6

NAME: ANTHONY TALERICO, JR., INDIVIDUALLY AND IN
HIS OFFICE AS FMERA OFFICER

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MONMOUTH, EATONTOWN

STATE & ZIP CODE: NEW JERSEY 07724

TELEPHONE NUMBER: N/A

RESPONDENT NO. 7

NAME: LILLIAN BURRY, INDIVIDUALLY AND IN HER
OFFICE AS FMERA OFFICER

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MONMOUTH, COLTS NECK

STATE & ZIP CODE: NEW JERSEY 07722

TELEPHONE NUMBER: N/A

RESPONDENT NO. 8

NAME: REGINA MCGRADY, INDIVIDUALLY AND IN HER
OFFICE AS FMERA OFFICER

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MONMOUTH, OCEANPORT

STATE & ZIP CODE: NEW JERSEY 07757

TELEPHONE NUMBER: N/A

RESPONDENT NO. 9

NAME: TRACY BUCKLEY, INDIVIDUALLY AND IN HER OFFICE AS FMERA OFFICER

STREET ADDRESS: [REDACTED]

COUNTY, CITY: TINTON FALLS

STATE & ZIP CODE: NEW JERSEY 07724

TELEPHONE NUMBER: Unknown

RESPONDENT NO. 10

NAME: JAY COFFEY, INDIVIDUALLY AND IN HIS OFFICE AS FMERA OFFICER

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MONMOUTH, OCEANPORT

STATE & ZIP CODE: NEW JERSEY 07757

TELEPHONE NUMBER: Unknown

RESPONDENT NO. 11

NAME: MATTHEW J TEVENAN, INDIVIDUALLY AND IN HIS OFFICE AS NETFLIX OFFICER

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MANHATTAN BEACH

STATE & ZIP CODE: CALIFORNIA 90266

TELEPHONE NUMBER:

RESPONDENT NO. 12

NAME: RIKER DANZIG, LLP

STREET ADDRESS: HEADQUARTERS PLZ, ONE SPEEDWELL AVE

COUNTY, CITY: MORRIS, MORRISTOWN

STATE & ZIP CODE: NEW JERSEY 07962-1981

TELEPHONE NUMBER: N/A

RESPONDENT NO. 13

NAME: STEVEN GALLO, INDIVIDUALLY AND IN HIS OFFICE AS FMERA OFFICER

STREET ADDRESS: [REDACTED]

COUNTY, CITY: HUDSON, BAYONNE

STATE & ZIP CODE: NEW JERSEY 07002

TELEPHONE NUMBER: Unknown

RESPONDENT NO. 14

NAME: STEPHEN ZEGAR, INDIVIDUALLY AND IN HIS
OFFICE AS NETFLIX OFFICER

STREET ADDRESS: 10100 SANTA MONICA BLVD, STE 2200

COUNTY, CITY: LOS ANGELES, LOS ANGELES

STATE & ZIP CODE: CALIFORNIA 90067

TELEPHONE NUMBER: Unknown

RESPONDENT NO. 15

NAME: JAMERA SIRMANS, INDIVIDUALLY AND IN HER
OFFICE AS FMERA OFFICER

STREET ADDRESS: [REDACTED]

COUNTY, CITY: ESSEX, NEWARK

STATE & ZIP CODE: NEW JERSEY 07102

TELEPHONE NUMBER: N/A

RESPONDENT NO. 16

NAME: JORGE SANTOS, INDIVIDUALLY AND IN HIS
OFFICE AS FMERA OFFICER

STREET ADDRESS: [REDACTED]

COUNTY, CITY: BURLINGTON, BORDENTOWN

STATE & ZIP CODE: NEW JERSEY 08505

TELEPHONE NUMBER: N/A

RESPONDENT NO. 17

NAME: ROBERT A KIRSCH, INDIVIDUALLY AND
IN HIS ADMINISTRATIVE AND EXECUTIVE CAPACITY AS
OFFICER OF THE NJ SUPERIOR COURT

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MERCER, TRENTON

STATE & ZIP CODE: NEW JERSEY 08608

TELEPHONE NUMBER: N/A

RESPONDENT NO. 18

NAME: KAREN M. CASSIDY

STREET ADDRESS: [REDACTED], 1ST FLOOR

COUNTY, CITY: UNION, ELIZABETH

STATE & ZIP CODE: NEW JERSEY 07207

TELEPHONE NUMBER: N/A

RESPONDENT NO. 19

NAME: CHRISTINE P. O'HEARN

STREET ADDRESS: [REDACTED]

COUNTY, CITY: CAMDEN, CAMDEN

STATE & ZIP CODE: NEW JERSEY 08101

TELEPHONE NUMBER: N/A

RESPONDENT NO. 20

NAME: RENEE MARIE BUMB

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MERCER, TRENTON

STATE & ZIP CODE: NEW JERSEY 08608

TELEPHONE NUMBER: N/A

RESPONDENT NO. 21

NAME: THE NEW JERSEY SENATE

STREET ADDRESS: THE STATE HOUSE

COUNTY, CITY: MERCER, TRENTON

STATE & ZIP CODE: NEW JERSEY 08625-0099

TELEPHONE NUMBER: N/A

RESPONDENT NO. 22

NAME: THE NEW JERSEY LEGISLATURE

STREET ADDRESS: THE STATE HOUSE ANNEX, 145 W. STATE ST.

COUNTY, CITY: MERCER, TRENTON

STATE & ZIP CODE: NEW JERSEY 08625-0068

TELEPHONE NUMBER: N/A

RESPONDENT NO. 23

NAME: THE NEW JERSEY STATE ASSEMBLY

STREET ADDRESS: THE STATE HOUSE

COUNTY, CITY: MERCER, TRENTON

STATE & ZIP CODE: NEW JERSEY 08625-0098

TELEPHONE NUMBER: N/A

RESPONDENT NO. 24

NAME: THE NJ OFFICE OF THE GOVERNOR

STREET ADDRESS: 225 W. STATE ST., 3RD FLOOR

COUNTY, CITY: MERCER, TRENTON

STATE & ZIP CODE: NEW JERSEY 08625-0001

TELEPHONE NUMBER: N/A

RESPONDENT NO. 25

NAME: RAWTV

STREET ADDRESS: [REDACTED]

COUNTY, CITY: GREATER LONDON, LONDON

STATE & ZIP CODE: UNITED KINGDOM EC2A 3LT

TELEPHONE NUMBER: N/A

RESPONDENT NO. 26NAME: BRUCE STEADMAN, INDIVIDUALLY AND
IN HIS OFFICE AS FMERA OFFICER

STREET ADDRESS: UNKNOWN CH [REDACTED]

COUNTY, CITY: UNKNOWN CH MERCER, TRENTON

STATE & ZIP CODE: UNKNOWN CH NEW JERSEY 08625-0990

TELEPHONE NUMBER: UNKNOWN

RESPONDENT NO. 27

NAME: LINDA D STENDER

STREET ADDRESS: UNKNOWN CH [REDACTED]

COUNTY, CITY: UNKNOWN CH UNION, SCOTCH PLAINS

STATE & ZIP CODE: UNKNOWN CH NEW JERSEY 07076

TELEPHONE NUMBER: UNKNOWN

RESPONDENT NO. 28NAME: NICHOLAS SCUTARI, INDIVIDUALLY AND
IN HIS OFFICES AS NJ SENATOR AND CHAIR OF THE
JUDICIARY COMMITTEE

STREET ADDRESS: [REDACTED]

COUNTY, CITY: UNION, LINDEN

STATE & ZIP CODE: NEW JERSEY 07036

TELEPHONE NUMBER: N/A

RESPONDENT NO. 29

NAME: NEW JERSEY ASSOCIATION OF JUSTICE

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MERCER, TRENTON

STATE & ZIP CODE: NEW JERSEY 08608

TELEPHONE NUMBER: N/A

RESPONDENT NO. 30

NAME: NEW JERSEY ASSOCIATION OF JUSTICE
PAC

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MERCER, TRENTON

STATE & ZIP CODE: NEW JERSEY 08608

TELEPHONE NUMBER: N/A

RESPONDENT NO. 31

NAME: JAVERBAUM WURGAFT

STREET ADDRESS: 589 8TH AVE, 21ST FLOOR

COUNTY, CITY: NEW YORK, NEW YORK

STATE & ZIP CODE: NEW YORK 10018

TELEPHONE NUMBER:

RESPONDENT NO. 32

NAME: GERALD H BAKER

STREET ADDRESS: 589 8TH AVE, 21ST FLOOR

COUNTY, CITY: NEW YORK, NEW YORK

STATE & ZIP CODE: NEW YORK 10018

TELEPHONE NUMBER: N/A

RESPONDENT NO. 33

NAME: MICHAEL GALPERN

STREET ADDRESS: [REDACTED]

COUNTY, CITY: CAMDEN, VOOKHEES

STATE & ZIP CODE: NEW JERSEY 08043

TELEPHONE NUMBER: N/A

RESPONDENT NO. 34

NAME: FRANCISCO J RODRIGUEZ

STREET ADDRESS: [REDACTED]

COUNTY, CITY: BERGEN, HACKENSACK

STATE & ZIP CODE: NEW JERSEY 07601

TELEPHONE NUMBER: N/A

RESPONDENT NO. 35

NAME: JEFFREY RIZKA

STREET ADDRESS: 505 MORRIS AVE, STE 201

COUNTY, CITY: UNION, SPRINGFIELD

STATE & ZIP CODE: NEW JERSEY 07081

TELEPHONE NUMBER: N/A

RESPONDENT NO. 36

NAME: STARK & STARK
STREET ADDRESS: 100 AMERICAN METRO BLVD.
COUNTY, CITY: MERCER, HAMILTON
STATE & ZIP CODE: NEW JERSEY 08619
TELEPHONE NUMBER: N/A

RESPONDENT NO. 37

NAME: ROBERT J BRATMAN
STREET ADDRESS: 993 LENOX DR., STE 101
COUNTY, CITY: MERCER, LAWRENCE TOWNSHIP
STATE & ZIP CODE: NEW JERSEY 08648
TELEPHONE NUMBER: N/A

RESPONDENT NO. 38

NAME: DEBORAH DUNN
STREET ADDRESS: [REDACTED]
COUNTY, CITY: BURLINGTON, MOUNT LAUREL
STATE & ZIP CODE: NEW JERSEY 08054
TELEPHONE NUMBER: N/A

RESPONDENT NO. 39

NAME: MICHAEL DONAHUE
STREET ADDRESS: 993 LENOX DR., STE 101
COUNTY, CITY: MERCER, LAWRENCE TOWNSHIP
STATE & ZIP CODE: NEW JERSEY 08648
TELEPHONE NUMBER: N/A

RESPONDENT NO. 40

NAME: EVAN LIDE
STREET ADDRESS: [REDACTED]
COUNTY, CITY: HUNTERDON, LAMBERTVILLE
STATE & ZIP CODE: NEW JERSEY 08530
TELEPHONE NUMBER: N/A

RESPONDENT NO. 41

NAME: BRYAN ROBERTS
STREET ADDRESS: [REDACTED]
COUNTY, CITY: UNION, CLARK
STATE & ZIP CODE: NEW JERSEY 07066
TELEPHONE NUMBER: N/A

RESPONDENT NO. 42

NAME: JOHN A SAKSON
STREET ADDRESS: 993 LENOX DR. STE 200
COUNTY, CITY: MERCER, LAWRENCE TOWNSHIP
STATE & ZIP CODE: NEW JERSEY 08648
TELEPHONE NUMBER: N/A

RESPONDENT NO. 43

NAME: DOMENIC SANGINITI
STREET ADDRESS: 993 LENOX DR. STE 200
COUNTY, CITY: MERCER, LAWRENCE TOWNSHIP
STATE & ZIP CODE: NEW JERSEY 08648
TELEPHONE NUMBER: N/A

RESPONDENT NO. 44

NAME: LEVINSON AXELROD
STREET ADDRESS: 2 LINCOLN HIGHWAY
COUNTY, CITY: MIDDLESEX, EDISON
STATE & ZIP CODE: NEW JERSEY 08820
TELEPHONE NUMBER: N/A

RESPONDENT NO. 45

NAME: RICHARD MARCOLUS
STREET ADDRESS: [REDACTED]
COUNTY, CITY: MONMOUTH, ATLANTIC HIGHLANDS
STATE & ZIP CODE: NEW JERSEY 07716
TELEPHONE NUMBER: N/A

RESPONDENT NO. 46

NAME: CHRISTOPHER DEANGELO
STREET ADDRESS: 2 LINCOLN HIGHWAY
COUNTY, CITY: MIDDLESEX, EDISON
STATE & ZIP CODE: NEW JERSEY 08820
TELEPHONE NUMBER: N/A

RESPONDENT NO. 47

NAME: MICHAEL FUSCO
STREET ADDRESS: [REDACTED]
COUNTY, CITY: SOMERSET, GLADSTONE
STATE & ZIP CODE: NEW JERSEY 07934
TELEPHONE NUMBER: N/A

RESPONDENT NO. 48

NAME: KIMBERLY GOZSA
STREET ADDRESS: [REDACTED]
COUNTY, CITY: OCEAN, FORKED RIVER
STATE & ZIP CODE: NEW JERSEY 08731
TELEPHONE NUMBER: N/A

RESPONDENT NO. 49

NAME: BRETT GREINER
STREET ADDRESS: 2 LINCOLN HIGHWAY
COUNTY, CITY: MIDDLESEX, EDISON
STATE & ZIP CODE: NEW JERSEY 08818
TELEPHONE NUMBER: N/A

RESPONDENT NO. 50

NAME: ADAM ROTHENBERG
STREET ADDRESS: 2 LINCOLN HIGHWAY
COUNTY, CITY: MIDDLESEX, EDISON
STATE & ZIP CODE: NEW JERSEY 08818
TELEPHONE NUMBER: N/A

RESPONDENT NO. 51

NAME: LUM DRASCO POSITAN
STREET ADDRESS: 103 EISENHOWER PKWY, STE 401
COUNTY, CITY: ESSEX, ROSELAND
STATE & ZIP CODE: NEW JERSEY 07068
TELEPHONE NUMBER: N/A

RESPONDENT NO. 52

NAME: STEPHEN EISENSTEIN
STREET ADDRESS: 103 EISENHOWER PKWY, STE 401
COUNTY, CITY: ESSEX, ROSELAND
STATE & ZIP CODE: NEW JERSEY 07068
TELEPHONE NUMBER: N/A

RESPONDENT NO. 53

NAME: WAYNE POSITAN
STREET ADDRESS: [REDACTED]
COUNTY, CITY: ESSEX, ESSEX FALLS
STATE & ZIP CODE: NEW JERSEY 07021
TELEPHONE NUMBER: N/A

RESPONDENT NO. 54

NAME: STARR GERN DAVISON & RUBIN
 STREET ADDRESS: 105 EISENHOWER PKWY, STE 401
 COUNTY, CITY: ESSEX, ROSELAND
 STATE & ZIP CODE: NEW JERSEY 07068
 TELEPHONE NUMBER: N/A

RESPONDENT NO. 55

NAME: SHELLEY STANGLER
 STREET ADDRESS: [REDACTED]
 COUNTY, CITY: UNION, SPRINGFIELD
 STATE & ZIP CODE: NEW JERSEY 07081
 TELEPHONE NUMBER: N/A

RESPONDENT NO. 56

NAME: IRA STARR
 STREET ADDRESS: [REDACTED]
 COUNTY, CITY: PASSAIC, LITTLE FALLS
 STATE & ZIP CODE: NEW JERSEY 07424
 TELEPHONE NUMBER: N/A

RESPONDENT NO. 57

NAME: LYNCH LYNCH HELD ROSENBERG
 STREET ADDRESS: 440 ROUTE 17 N., 3RD FLOOR
 COUNTY, CITY: BERGEN, HASBROUCK HEIGHTS
 STATE & ZIP CODE: NEW JERSEY 07604
 TELEPHONE NUMBER: N/A

RESPONDENT NO. 58

NAME: LYNCH LAW FIRM
 STREET ADDRESS: 440 ROUTE 17 N., 3RD FLOOR
 COUNTY, CITY: BERGEN, HASBROUCK HEIGHTS
 STATE & ZIP CODE: NEW JERSEY 07604
 TELEPHONE NUMBER: N/A

RESPONDENT NO. 59

NAME: MICHAEL ROSENBERG
 STREET ADDRESS: [REDACTED]
 COUNTY, CITY: BERGEN, CLOSTER
 STATE & ZIP CODE: NEW JERSEY 07624
 TELEPHONE NUMBER: N/A

RESPONDENT NO. 60

NAME: ERICA AVONDOGLIO
STREET ADDRESS: [REDACTED]
COUNTY, CITY: MORRIS, RANDOLPH
STATE & ZIP CODE: NEW JERSEY 07869
TELEPHONE NUMBER: N/A

RESPONDENT NO. 67

NAME: MICHAEL T BUONOCORE
STREET ADDRESS: [REDACTED]
COUNTY, CITY: MORRIS, LONG VALLEY
STATE & ZIP CODE: NEW JERSEY 07853
TELEPHONE NUMBER: N/A

RESPONDENT NO. 68

NAME: NEIL WEINER
STREET ADDRESS: [REDACTED]
COUNTY, CITY: BERGEN, SADDLE RIVER
STATE & ZIP CODE: NEW JERSEY 07453
TELEPHONE NUMBER: N/A

RESPONDENT NO. 69

NAME: STAVOLA CONSTRUCTION MATERIALS
STREET ADDRESS: [REDACTED]
COUNTY, CITY: SOMERSET, BOUND BROOK
STATE & ZIP CODE: NEW JERSEY 08805
TELEPHONE NUMBER: N/A

RESPONDENT NO. 70

NAME: ELIZABETH STAVOLA
STREET ADDRESS: [REDACTED]
COUNTY, CITY: FORT WAYNE
STATE & ZIP CODE: INDIANA 46805
TELEPHONE NUMBER: N/A

RESPONDENT NO. 71

NAME: DI GROUP ARCHITECTURE
STREET ADDRESS: [REDACTED]
COUNTY, CITY: MIDDLESEX, NEW BRUNSWICK
STATE & ZIP CODE: NEW JERSEY 08901
TELEPHONE NUMBER: N/A

RESPONDENT NO. 72

NAME: VINCENT MYERS

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MIDDLESEX, NEW BRUNSWICK

STATE & ZIP CODE: NEW JERSEY 08901

TELEPHONE NUMBER: N/A

RESPONDENT NO. 73

NAME: RICHARD D ALDERISO

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MIDDLESEX, NEW BRUNSWICK

STATE & ZIP CODE: NEW JERSEY 08901

TELEPHONE NUMBER: N/A

RESPONDENT NO. 74

NAME: ROBERT RYAN

STREET ADDRESS: [REDACTED]

COUNTY, CITY: SEWARD

STATE & ZIP CODE: PENNSYLVANIA 15954

TELEPHONE NUMBER: N/A

RESPONDENT NO. 75

NAME: JEFFREY VENEZIA

STREET ADDRESS: [REDACTED]

COUNTY, CITY: MIDDLESEX, PISCATAWAY

STATE & ZIP CODE: NEW JERSEY 08854

TELEPHONE NUMBER: N/A

RESPONDENT NO. 76

NAME: WEILKOTZ & CO., LLC

STREET ADDRESS: [REDACTED]

COUNTY, CITY: PASSAIC, POMPTON LAKES

STATE & ZIP CODE: NEW JERSEY 07442

TELEPHONE NUMBER: N/A

RESPONDENT NO. 77

NAME: MATTHEW WEILKOTZ

STREET ADDRESS: [REDACTED]

COUNTY, CITY: ESSEX, CEDAR GROVE

STATE & ZIP CODE: NEW JERSEY 07009

TELEPHONE NUMBER: N/A

RESPONDENT NO. 78

NAME: STEVEN WEILKOTZ
STREET ADDRESS: [REDACTED]
COUNTY, CITY: PASSAIC, WAYNE
STATE & ZIP CODE: NEW JERSEY 07470
TELEPHONE NUMBER: N/A

RESPONDENT NO. 78

NAME: CATHY L WALDOR
STREET ADDRESS: [REDACTED]
COUNTY, CITY: ESSEX, NEWARK
STATE & ZIP CODE: NEW JERSEY 07102
TELEPHONE NUMBER: N/A

RESPONDENT NO. 78

NAME: MADELINE COX ARLEO
STREET ADDRESS: [REDACTED]
COUNTY, CITY: ESSEX, NEWARK
STATE & ZIP CODE: NEW JERSEY 07102
TELEPHONE NUMBER: N/A

RESPONDENT NO. 79

NAME: JOHN DOE 1
STREET ADDRESS: Unknown
COUNTY, CITY: Unknown
STATE & ZIP CODE: Unknown
TELEPHONE NUMBER: Unknown

RESPONDENT NO. 80

NAME: JOHN DOE 2
STREET ADDRESS: Unknown
COUNTY, CITY: Unknown
STATE & ZIP CODE: Unknown
TELEPHONE NUMBER: Unknown

RESPONDENT NO. 81

NAME: JOHN DOE 3
STREET ADDRESS: Unknown
COUNTY, CITY: Unknown
STATE & ZIP CODE: Unknown
TELEPHONE NUMBER: Unknown

RESPONDENT NO. 82

NAME: JOHN DOE 4
STREET ADDRESS: Unknown
COUNTY, CITY: Unknown
STATE & ZIP CODE: Unknown
TELEPHONE NUMBER: Unknown

RESPONDENT NO. 83

NAME: ABC, INC. 1
STREET ADDRESS: Unknown
COUNTY, CITY: Unknown
STATE & ZIP CODE: Unknown
TELEPHONE NUMBER: Unknown

RESPONDENT NO. 83

NAME: ABC, INC. 2
STREET ADDRESS: Unknown
COUNTY, CITY: Unknown
STATE & ZIP CODE: Unknown
TELEPHONE NUMBER: Unknown

RESPONDENT NO. 83

NAME: ABC, INC. 3
STREET ADDRESS: Unknown
COUNTY, CITY: Unknown
STATE & ZIP CODE: Unknown
TELEPHONE NUMBER: Unknown

RESPONDENT NO. 83

NAME: ABC, INC. 4
STREET ADDRESS: Unknown
COUNTY, CITY: Unknown
STATE & ZIP CODE: Unknown
TELEPHONE NUMBER: Unknown

II. BASIS FOR JURISDICTION

This complaint is filed pursuant to the jurisdiction of 52 U.S.C.30109 and 11 C.F.R. 104, 111

III. STATEMENT OF CLAIM

- A. The events giving rise to these claims occurred at numerous places in New Jersey and California; with monetary transactions occurring between Netflix's place of business in or around Los Angeles, California and several locations in New Jersey providing for jurisdiction in New Jersey under 18 U.S.C. 1965
- B. The earliest of these claims accrued on November 11, 2022 by equitable tolling under the "Discovery Rule" Doctrine, and where other claims accrued at other times, such are pleaded with specificity indicating any applicable reasons for equitable tolling
- C. The facts giving rise to these claims are as follows:

INTRODUCTION

1.) Robert Menendez is currently facing federal charges of accepting bribes and acting as an unregistered foreign agent. In the course of his actions as an unregistered foreign agent, he participated as a coconspirator in a money laundering network which financed his electoral campaigns. The money laundering network created an associated-in-fact enterprise, which has engaged and which continues to engage in activities of money laundering by structuring transactions to avoid the reporting requirements of 52 U.S.C. 30104 et seq. and 11 C.F.R. 104, 110 et seq.; which violations of 18 U.S.C. 1956 were pivotal in the election of NJ and US Senators including Menendez. The identity of these coconspirators is clearly evident from documents procured from the NJ Election Law Enforcement Commission, which show lawyers tied together by membership in the "New Jersey Association of Justice" acting jointly without reporting the fact of them doing so as required by law; and to circumvent campaign contribution limits by structured transactions violating 18 U.S.C. 1956. At least two of these structured transactions were made by a current sitting federal district judge, whose quid pro quo act of money laundering secured for her a recommendation for nomination by the unregistered foreign agent, Menendez. Netflix has recently engaged the services of the money laundering network to acquire a 292 parcel of public land at well below

market value. The approval of the bid was made contingent on benefit as consideration in the form of structured transactions by the money laundering network which Menendez forms a part of to NJ politicians; which was in turn offered as benefit as consideration for Netflix producing a movie that laundered the reputation of a deceased member of that money laundering network. The money laundering network left a paper trail showing RICO-eligible fraud, bribery, and money laundering; and the benefit conferred to Menendez as coconspirator of the money laundering network was not reported as required by 52 U.S.C. 30104 et seq. and 11 C.F.R. 104, 110. This complaint therefore ensues, requesting investigation into the activities of the money laundering network and describing with particularity the known identities of some of the coconspirators; while providing sufficient information with which to identify the remaining coconspirators of the money laundering network.

NJAJ Money Laundering

2.) The "New Jersey Association of Justice PAC" ("NJAJPAC") is a New Jersey Corporation that is an alter ego of the New Jersey Corporation "New Jersey Association of Justice" ("NJAJ"). The NJAJ has described itself on its website as a "Statewide association of over 2,500 members"; thereby explicitly admitting its nature as an associated-in-fact enterprise of 2,500 members, acting through each of its members as well as corporately. The NJAJ acts through its alter ego and members to lobby for the enactment or repeal of laws; by using financial incentives to politicians to influence their decisions; and by offering the benefit of acts of violation of 18 USC 1956 by its alter ego and its members to politicians and public officials as consideration for performance and non-performance of acts. The NJAJ also acts through its alter egos and members to appear as amicus curiae in NJ State Court cases for dual purposes: laundering its reputation as a deterrent to reporting of its money laundering activities, and to promote "dummy arguments" designed to weaken the position of parties to cases in which the NJAJ appears in support of, to the end of creating decisions which suit the interests of NJAJ members and their clients which are contrary to the positions of the parties which the NJAJ claims to appear as amicus in support of. Members of this associated-in-fact enterprise of NJAJ include, but are not limited to, Javerbaum Wurgaft, Gerald H. Baker, Michael Galpern, Theodore Romankow, Francisco J. Rodriguez,

Jeffrey Rizka, Stark & Stark, Robert J Bratman, Deborah Dunn, Michael Donahue, Evan Lide, Bryan Roberts, John A Sakson, Domenic Sanginiti, Levinson Axelrod, Richard Marcolus, Christopher Deangelo, Michael Fusco, Kimberly Gozsa, Brett Greiner, Adam Rothenberg, Lum Drasco Positan, Stephen Eisenstein, Wayne Positan, Starr Gern Davison & Rubin, Shelly Stangler, Ira Starr, Lynch Law Firm, Michael Rosenberg, Erica Avondoglio, Michael T Buonocore, James Lynch, Neil Weiner, John Doe 1, and ABC, Inc. 1 (hereinafter collectively, "NJAJ Money Launderers")

3.) Romankow is a member of NJAJ, and of the NJAJ Money Launderers, who is authorized by custom and/or policy of the NJAJ to conduct meetings, negotiations, and to execute informal and/or formal agreements on behalf of the and with the apparent authority of the NJAJ with politicians, amici curiae, and clients; which clients confer benefits upon NJAJ and its members, including but not limited to money, job offers, and things of value; as consideration for the NJAJ appearing as amicus curiae to weaken the positions of parties adverse to the client's interest, or for the NJAJ engaging in lobbying through acts of money laundering by its alter ego and members for the benefit of politicians as consideration for the politicians' performance or nonperformance of acts.

4.) Pursuant to Romankow's capacity described in "3"; he also meets with, negotiates with, and executes formal and/or informal agreements with persons and entities which he is acquainted with through his current and former public offices as Union County Board of Chosen Freeholders and Union County Improvement Authority; and through the BRS Conspiracy described in "41"-"65"; for those persons and entities to engage in straw donor activities or otherwise to make transactions in violation of 18 USC 1956 on behalf of the enterprise described in "44"; as consideration for Romankow's solicitation of government and business contracts for said persons and entities; and to the end of lobbying pursuant to the agreements described in "3"; as benefit as consideration for his performance and nonperformance of acts, including but not limited to influencing the approval of bids for contracts and sale of public resources. The persons and entities include, but are not limited to, Stavola Construction Materials, Elizabeth Stavola, Di Group Architecture, Vincent Myers, Richard D Alderiso, Robert Ryan, Jeffrey Venezia, Weilkotz & Co. LLC, Matthew Welkatz,

Steven Welkatz, John Doe 2, and ABC, Inc. 2 (hereinafter collectively, "money laundering network")

Production of The Hatchet Wielding Hitchhiker

5.) During the period from August 25 to September 10, 2021, Netflix, through its agent John Doe 3, contacted Romankow to confer regarding his contribution to THWH. During this conference, Romankow, in his capacity as member of the NJAJ Money Launderers, Money Laundering Network, and coconspirator of the bid-rigging syndicate conspiracy as described in "41"-"65", offered to help Netflix acquire a tract of public land and numerous state incentives, in consideration for Netflix wilfully depriving COMPLAINANT of his rights under 17 USC 106 in numerous of his copyright protected works, and for conforming their production of THWH to the narrative Romankow imposed. To wit: falsely representing as fact that COMPLAINANT was culpable of criminal conduct in the February 1, 2013 incident. During this period, on a date and time which will be determined through discovery, Netflix accepted this offer agreed to join the BRS conspiracy described in "41"-"65" with the purpose of engaging in monetary transactions designed to avoid reporting requirements imposed by State and federal law, and to promote unlawfully activity proscribed by 18 U.S.C. 1956; and 18 U.S.C. 1961 and thereby acquiring public land and State incentives as consideration for producing a film wilfully infringing on COMPLAINANT's copyrights and falsely representing as fact that COMPLAINANT was culpable of criminal conduct in the February 1, 2013 incident; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961; in furtherance of the BRS Enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

Pursuant to this agreement, Netflix recorded Romankow making the false statement that COMPLAINANT "Only knew [McBride] for a few hours before attacking him"; which is reasonably understood to imply that COMPLAINANT assaulted McBride without justification as a criminal act; whereas the truth of the matter is pleaded in "___"; that COMPLAINANT acted in defense of others and was innocent of any wrongdoing. Romankow made the statement with actual malice, knowing the falsity of the statement at the time it was made, and intending that harm would result.

Netflix agreed to publish this false statement, and to knowingly publish further false statements about COMPLAINANT to bolster this false statement and to discredit COMPLAINANT by falsely impugning criminal conduct to him and by imputing mental illness to him; and to wilfully infringe upon COMPLAINANT's copyrights to numerous copyright-protected works; as a benefit as consideration for the bid rigging syndicate conspiracy's acts in assisting Netflix to acquire public land and state incentives from the NJ State government through use of the bid rigging syndicate conspiracy's services; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

6.) On or about September 5, 2021 at or around 9AM, Netflix began film production of "The Hatchet Wielding Hitchhiker" ("THWH"); through its agent RAWTV

First Request for Offers to Purchase

7.) On or about 9/1/21 and/or 9/3/21 at Scutari's place of residence 136 Yale Terrace Linden, NJ and on or about 9/5/21 at East Bay Italian Grill 696 E. Bay Avenue Barnegat, NJ; Scutari, Romankow, and John Doe 3, as an agent or employee of Netflix; met, conferred with each other, and had a meeting of the minds and agreed with each other; that Romankow would solicit his Bid Rigging Syndicate Conspiracy, NJAJ Money Launderers, and Money Laundering Network; and obtain their services, and thereafter participate with them, in committing acts of violating 18 USC 1956 as benefit to Scutari as consideration for Scutari using his office to persuade FMERA Officers, personally and vicariously through Phil Murphy, to issue a request for offers to purchase a tract of land, with the intention of rigging the bid and selling the land to Netflix at below market value, as benefit to Netflix as consideration for Netflix conforming "The Hatchet Wielding Hitchhiker" documentary film to Romankow's narrative. Pursuant to this agreement, Romankow invited Javerbaum Wurgaft, Gerald H. Baker, Michael Galpern, Francisco J. Rodriguez, Jeffrey Rizka, Stark & Stark, Robert J Bratman, Deborah Dunn, Michael Donahue, Evan Lide, Bryan Roberts, John A Sakson, Domenic Sanginiti, Levinson Axelrod, Richard Marcolus, Christopher Deangelo, Michael Fusco, Kimberly Gozsa, Brett Greiner, Adam Rothenberg, Lum Drasco Positan, Stephen Eisenstein, Wayne Positan, Starr Gern Davison & Rubin, Shelly Stangler, Ira Starr, Lynch Law

Firm, Michael Rosenberg, Erica Avondoglio, Michael T Buonocore, James Lynch, Neil Weiner, Stavola Construction Materials, Elizabeth Stavola, Di Group Architecture, Vincent Myers, Richard D Alderiso, Robert Ryan, Jeffrey Venezia, Weilkotz & Co. LLC, Matthew Welkotch, Steven Welkotch, John Doe 1, John Doe 2, ABC, Inc. 1 and ABC, Inc. 2 to a testimonial affair believed on information to be at or near Citi Field in Queens, NY on 9/10/21

8.) Pursuant to the agreement in "7", on or about 9/10/21; Romankow, the NJAJ Money Launderers, the Money Laundering Network, and Scutari attended a testimonial affair believed on information to be at or near Citi Field in Queens, NY; at which Romankow, the NJAJ Money Launderers, and Money Laundering Network, and Scutari met with each other, conferred, had a meeting of the minds, and agreed to the terms contemplated by the agreement in "5"; and that the NJAJ Money Launderers and Money Laundering Network would join the BRS Conspiracy and ratify said agreement and make the transactions therein contemplated.

9.) On September 10, 2021, Romankow personally made a \$2,500 transaction, and caused the transactions described in "10"-"20" to be made through his coconspirators as alter egos as described therein, to Scutari; with the agreement with Scutari that it was a benefit as consideration for Scutari to engage in political lobbying on his and Netflix's behalf for the purpose of Fort Monmouth Economic Revitalization Authority ("FMERA") issuing a Request for Offers to Purchase ("RFOTP") a parcel of land using interstate wires. This RFOTP was wilfully intended to be a sham bidding process, in violation of 18 U.S.C. 1343; as the sale of the parcel to Netflix was the intended outcome of the RFOTP regardless of any other offers. This monetary transaction was purposely intended to avoid reporting requirements on lobbying set forth in N.J.S.A. 52:13C-19 et seq. and transactions set forth in N.J.S.A. 19:44A-1 et seq. and NJAC 19:25-1 et seq.; and to promote the unlawful activity described in "1"-"40" which was in violation of 18 U.S.C. 1956; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

10.) On 9/10/21; Romankow made a transaction of \$2,500, and on 9/14/21 Francisco J Rodriguez made a transaction of \$1,500, and Jeffrey Rizka made a transaction of \$1,500; which was, upon information and

belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

11.) On 9/14/21 Michael Donahue made a transaction of \$1,500, and on 10/18/21 Deborah Dunn made a transaction of \$1,000; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

12.) On 9/17/21 Stephen Eisenstein made a transaction of \$1,300, Wayne Positan made a transaction of \$1,300; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

13.) On 9/10/21 Craig J Coughlin made a transaction of \$2,600, David Minchello made a transaction of \$2,600, Louis N Rainone made a

transaction of \$2,600 and the alter ego of Craig J Coughlin, The Election Fund of Craig J Coughlin, made a transaction of \$2,600; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions totaled \$10,400, and were thus in excess of the \$8,200 contribution limit imposed by NJSA 19:44A-11.3 and were structured to avoid the reporting requirements of NJAC 19:25-11.8 and NJSA 19:44A-8. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

14.) For the benefit of the transactions described in "9"-"13" above offered as consideration therefor; pursuant to the agreement described in "5"; Scutari used his office to persuade the FMERA Officers, personally and vicariously through Phil Murphy: to approve of Netflix's bid for the mega parcel as benefit as consideration for Netflix performance of publishing the Trailer described in "35"; which publishing was also done as benefit as consideration for the performance of the act of convening the FMERA Real Estate and Audit Committees to approve of Netflix's bid; in violation of NJSA 2C:27-2,-10,-11 as conduct in furtherance of the BRS Enterprise.

15.) During the period from September 10, 2021 to October 15, 2021, Scutari engaged in unregistered lobbying, receiving unlawful transactions to his campaign and credit to his reputation as benefit as consideration for using his public office, and engaging in activities in furtherance of during his employment in said public office, to arrange the RFOTP in violation of NJSA 2C:27-2,-8,-10,-11 ; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962. During this period, Scutari met with Phil Murphy, who had appointed Bruce Steadman as executive director of the FMERA, and with Murphy's help enlisted him as a member of the enterprise. On a date and time which will be determined through

discovery, Steadman and Murphy conferred with Romankow and Scutari, and all 4 agreed to cause the FMERA to issue the RFOTP specifically designed for Netflix. On a date and time which will be determined through discovery, Steadman met with Kara Kopach, Anthony Talerico, Jr., Jay Coffey, Lillian Burry, Tracy Buckley, Jamera Sirmans, Jorge Santos, and Regina McGrade and all agreed to participate in a sham-bid process in which Netflix was pre-selected for approval by the bid approval committee, ratifying the acts and conspiracy in "5"-"15"

16.) On October 15, 2021, FMERA issued an RFOTP for a 282 acre Mega Parcel, specifically indicating "film/movie production" as an intended use. FMERA added "excluded uses" of "medical/institutional requiring overnight stay"; to prevent hospitals and universities from bidding. This RFOTP was sent via interstate wires to computers in California and elsewhere via the FMERA website and also the communications between Netflix and members of the bid-rigging syndicate conspiracy described in "41"-"65", the exact date and time and identity of whom will be determined through discovery. The RFOTP made the following misrepresentations, wilfully made by the FMERA with knowledge of their falsity and intending reliance by bidders in the wire transfer or FDIC insured bank transactions of deposit fees:

- a.) That the RFOTP was a genuine request, and that the parcel had not already been sold to Netflix contingent on THWH conforming to Romankow's narrative;
- b.) That any offer must conform to the reuse plan and agreements between the U.S. Army and FMERA; which require 302 housing units to be built on Parcel B in Eatontown, which is part of the Mega Parcel with which the RFOTP is concerned;
- c.) Any offeror must stipulate to a non-negotiable lease of building 502 to the FMERA for \$1 per year triple net for 6 years, renewable for 2 years every 2 years thereafter.

Knowingly sending these misrepresentations over interstate wires, intending to induce reliance thereon, was a violation of 18 U.S.C. 1343; which acts were performed for the benefit as consideration described in "9"-"15"; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962

Second Request for Offers to Purchase

17.) On a date and time to be ascertained through discovery at Scutari's place of residence 136 Yale Terrace Linden, NJ and on a date and time to be ascertained with certainty through discovery at East Bay Italian Grill 696 E. Bay Avenue Barnegat, NJ; Scutari, Romankow, and John Doe 3, as an agent or employee of Netflix; met, conferred with each other, and had a meeting of the minds and agreed with each other: that Romankow would solicit his Bid Rigging Syndicate Conspiracy, NJAJ Money Launderers, and Money Laundering Network; and obtain their services, and thereafter participate with them, in committing acts of violating 18 USC 1956 as benefit to Scutari as consideration for Scutari using his office to persuade FMERA Officers, personally and vicariously through Phil Murphy, to terminate the initial RFOTP and thereafter to issue a second request for offers to purchase a tract of land, conforming to the terms of the clandestine negotiations referred to in "5"; and with the intention of rigging the bid and selling the land to Netflix at below market value, as benefit to Netflix as consideration for Netflix conforming "The Hatchet Wielding Hitchhiker" documentary film to Romankow's narrative and the directives of the BRS Conspiracy. All parties to the initial agreement in "5" thereafter, at a date and time to be ascertained with certainty upon discovery, met and conferred with each other, and agreed to ratify the agreement herein described.

18.) During the period of 10/15/21-10/15/22, on dates and times which will be ascertained with certainty upon discovery; Romankow used his position in "3" to cause the NJAJ Money Launderers to make transactions to Nicholas Scutari, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; and Romankow used his position in "4" to cause the Money Laundering Network to make transactions to Nicholas Scutari, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; which were, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA

19:44A-8 and NJAC 19:25-10. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

19.) During the period of 10/15/21-10/15/22, on dates and times which will be ascertained with certainty upon discovery; Romankow used his position in "3" to cause the NJAJ Money Launderers to make transactions to Nicholas Scutari, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; and Romankow used his position in "4" to cause the Money Laundering Network to make transactions to Nicholas Scutari, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; which were, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions totaled in excess of the \$8,200 contribution limit imposed by NJSA 19:44A-11.3 and were structured to avoid the reporting requirements of NJAC 19:25-11.8 and NJSA 19:44A-8. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

20.) During the period of 10/15/21-10/15/22, on dates and times which will be ascertained with certainty upon discovery; Romankow used his position in "3" to cause the NJAJ Money Launderers to make transactions to Nicholas Scutari, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; and Romankow used his position in "4" to cause the Money Laundering Network to make transactions to Nicholas Scutari, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; which were, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without

certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10; and to avoid reporting requirements for contributions in excess of the limits proscribed by NJSA 19:44A-1et seq. and NJAC 19:25-1 et seq. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

21.) During the period from October 15, 2021 to December 14, 2022; because the purpose of the RFOTP, SECOND RFOTP was to legitimize the pre-decided sale to Netflix of public land in a sham-bidding process; Netflix in fact negotiated the misrepresented "non-negotiable" lease of Building 502; and agreed to confer upon the members of FMERA a benefit of \$3 Million "Relocation Fee" as consideration for:

a.) Negotiated waiver of "non-negotiable lease" term of the RFOTP, SECOND RFOTP;

b.) Waiver of reuse plan requirement of 302 housing units for Parcel B in Eatontown, without mandatory determination upon use variance required by N.J.A.C. 19:31C-3.21;

c.) Favorable scoring of Netflix's bid and unfavorable scoring of competitors' bids by FMERA officials;

d.) Exclusion of competitors' nonconforming bids, without opportunities to modify offers to conform with reuse plan; and inclusion of Netflix's nonconforming bid, with opportunities to modify to conform to, or waiver of, reuse plan requirements.

The transaction of \$3 Million from Netflix to the FMERA was intended as a benefit as consideration for acts performed by FMERA officers in violation of NJSA 2C:27-2,-8,-10,-11; and was designed to avoid reporting requirements of state and federal law; specifically the reporting requirements imposed by the New Jersey Administrative Code for reporting negotiations for sale of land by the FMERA; in violation of 18 USC 1956.and is the subject of a conspiracy to commit a violation of 18 USC 1956 therewith, to wit: transactions designed to promote the unlawful activity described in "1"-"40"; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

22.) On SEPTEMBER 7, 2021, a planned development of additional land by a third party was cancelled and the approximately 10 acres of public land upon which said development was intended thereafter became free. Pursuant to the negotiations in "21" as for the benefit of Netflix's consideration of a \$3 Million "Relocation Fee" and purchase of an additional 10 Acres pursuant to the agreement in "5" and the negotiations in " "; FMERA rescinded the RFOTP on MARCH 8, 2022 and issued a SECOND RFOTP pursuant to the same conspiracy described in "2"-"21" and in violation of the statutes described in "2"-"21" on March 8, 2022, changing the terms of the RFOTP pursuant to the negotiations described in "5" and "21" between Netflix and the BRS Conspiracy; with an additional approximately 10 acres ; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962..

23.) During the period from MARCH 8, 2022 to JUNE 6, 2022, in reliance with the misrepresentations in "10" above, the following parties deposited over \$2 million each, which amount will be made certain by discovery, as deposit of offered purchasing price in response to the SECOND RFOTP, using interstate wires and/or FDIC banks:

- a.) Extell Acquisitions, LLC
- b.) Mega Parcel Development, LLC
- c.) RDR Partners, LLC

The receipt of each of these deposits by the bid rigging syndicate conspiracy or coconspirators therewith or agents thereof, was each a violation of 18 USC 1956, a transaction designed to promote the unlawful activity of 18 USC 1343 described in "9"-"22"; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962

24.) On or about 10/1/22, Which date and time and location will be ascertained with certainty through discovery, Romankow and Scutari met, conferred, and agreed with each other that Romankow would solicit the NJAJ Money Launderers and Money Laundering Network to make transactions jointly to Scutari's campaign fund designed to conceal unlawful activity and avoid reporting requirements under State and Federal law, in violation of 18 USC 1956 as benefit as consideration

for Scutari using his office to persuade the FMERA Officers, personally and vicariously through Phil Murphy, to execute a Purchase and Sale and Redevelopment Agreement ("PSARA") with Netflix for the Mega Parcel; contingent on Netflix offering the benefit of publishing THWH as consideration therefor, in violation of 2c:27-2,-10,-11 as conduct in furtherance of the BRS Enterprise.

25.) On 10/12/22; Gerald H Baker made a transaction of \$2,600, Michael Galpern made a transaction of \$2,600, and Theodore Romankow made a transaction of \$500; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

26.) On 10/12/22; Robert J Bratman made a transaction of \$2,000, Michael Donahue made a transaction of \$2,600, Evan Lide made a transaction of \$2,000, Bryan Roberts made a transaction of \$2,600, John A Sakson made a transaction of \$2,600, and Domenic Sanginiti made a transaction of \$500; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions totaled \$13,300, and were thus in excess of the \$8,200 contribution limit imposed by NJSA 19:44A-11.3 and were structured to avoid the reporting requirements of NJAC 19:25-11.8 and NJSA 19:44A-8. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

27.) On 10/12/22 Christopher Deangelo made a transaction of \$1,000, Michael Fusco made a transaction of \$1,000, Kimberly Gozsa made a transaction of \$2,600, Brett Greiner made a transaction of \$1,000, and Adam Rothenberg made a transaction of \$500; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

28.) On 10/12/22 Shelley Stangler made a transaction of \$2,600 and Ira Starr made a transaction of \$2,600; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

29.) On or about 10/1/22 which date will be ascertained with certainty through discovery Elizabeth Stavola made a transaction of \$1,500, on 10/12/22 Elizabeth Stavola made a transaction of \$1,000 and Stavola Construction Materials, which is an alter ego of Elizabeth Stavola, made a transaction of \$1,000; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth

by NJSA 19:44A-8 and NJAC 19:25-10; and to avoid reporting requirements for contributions in excess of the limits proscribed by NJSA 19:44A-1 et seq. and NJAC 19:25-1 et seq. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

30.) On 10/12/22 Michael Rosenberg made a transaction of \$2,600, Erica Avondoglio made a transaction of \$2,600, Michael T Buonocore made a transaction of \$2,600, James Lynch made a transaction of \$2,600, and Neil Weiner made a transaction of \$2,600; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions totaled \$13,000, and were thus in excess of the \$8,200 contribution limit imposed by NJSA 19:44A-11.3 and were structured to avoid the reporting requirements of NJAC 19:25-11.8 and NJSA 19:44A-8. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

31.) On 10/14/22; Vincent Myers made a transaction of \$2,600, Robert Ryan made a transaction of \$1,300; and on 10/17/22 Richard Alderiso made a transaction of \$2,600 and Jeffrey Venezia made a transaction of \$2,600; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions totaled \$13,300, and were thus in excess of the \$8,200 contribution limit imposed by NJSA 19:44A-11.3 and were structured to avoid the reporting requirements of NJAC 19:25-11.8 and NJSA 19:44A-8. These transactions were each an

act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

32.) On 10/11/22 Matthew Weilkotz made a transaction of \$884, and Steven Weilkotz made a transaction of \$1,716; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

33.) On 10/25/22 Craig J Coughlin made a transaction of \$866.67, David Minchello made a transaction of \$866.67, and Louis N Rainone made a transaction of \$866.66; which was, upon information and belief, each from their respective financial institutions to the financial institution holding the account of the candidate committee of Nicholas Scutari at a time to be ascertained with certainty through discovery; acting jointly without certifying the fact and structuring their transactions to avoid the reporting requirement of NJSA 19:44A-8(b)(1); and to avoid the reporting requirements of political committees set forth by NJSA 19:44A-8 and NJAC 19:25-10. These transactions were each an act of violating 18 USC 1956, a predicate act as part of racketeering activity defined by 18 USC 1961, in furtherance of the enterprise described in "44" and the agreement described in "5"

34.) For the benefit of the transactions described in "9"-"33" above as consideration; pursuant to the agreement described in "5"; Scutari used his office to persuade the FMERA Officers, personally and vicariously through Phil Murphy; to issue a Request for Offers to Purchase ("RFOTP"); for the benefit of which Netflix performed actions as consideration during production of THWH, to fulfill their end of the agreement in "5"; in violation of NJSA 2C:27-2; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in

violation of 18 U.S.C. 1962; and which resulted in damages to COMPLAINANT as pleaded in "____"- "____".

Advertisements by Netflix

35.) On or about December 13, 2022 at or around 12AM, in furtherance of the conspiracy and conduct of the NFBRs enterprise; pursuant to the agreement in "5" Netflix began broadcasting a motion picture work derivative of THWH and the works from which THWH is derived ("The Trailer"); which act was done as consideration for the benefit agreed to in "5" in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962. The Trailer begins by introducing COMPLAINANT as "The Hero" who saved a crowd of people from the domestic terrorist attack by McBride described in "____" The narrative clearly refers to COMPLAINANT, using his monikers, "Kai" and "The Hatchet Wielding Hitchhiker" in conjunction with COMPLAINANT's image and voice. The narrative initially focuses on COMPLAINANT's actions in saving a crowd of people during the incident on February 1, 2013 in Fresno, CA. A video of COMPLAINANT shaking his head and looking down as Alex Aguirre asks the question, "What actually happened that day in Fresno? Was this him being the hero, or not?" The phrase "what actually happened" with emphasis on "actually" implies the false statement of fact that the court record of what happened, and COMPLAINANT's account and sworn testimony thereof, is false. Taken as a whole, the statement and the accompanying visual depiction of incongruent body language by COMPLAINANT, creates the false impression and innuendo that COMPLAINANT was culpable of criminal acts in the incident and committed perjury during the arraignment of McBride. Whereas the truth of the matter is pleaded in "____"; showing that COMPLAINANT was innocent of any wrongdoing in the incident; and that COMPLAINANT truthfully answered all questions and testified truthfully during the arraignment of McBride. The Trailer also depicts, in conjunction with visual depictions of COMPLAINANT pantomiming his use of force, then sitting handcuffed behind visible crime scene tape; as Brad Mulcahy narrating beforehand, "hitting somebody in the head with a hatchet 3 times, blunt side or not, is violent." Taken as a whole, the statement; and the accompanying visual sequence of COMPLAINANT using force, then handcuffed and

under arrest behind crime scene tape; creates the false impression and innuendo that COMPLAINANT committed a violent criminal act against McBride that resulted in an arrest and/or charges for said act, during the incident. Whereas the truth of the matter is pleaded in “___”; showing that COMPLAINANT was fully justified in his use of force in defense of another, and that COMPLAINANT was innocent of any wrongdoing in the incident and was released from custody after cooperating, without any charges.

FMERA Approves of Netflix's Bid

36.) On December 14, 2022, the next day after the Trailer was released, because the Trailer conformed to Romankow's narrative and the directives of the BRS Conspiracy described in “41”-“65”, the FMERA Audit Committee headed by Anthony Talerico, Jr., and Real Estate Committee headed by Kara Kopach, were both convened. The Audit Committee discussed the anticipated \$3 Million windfall and disseminated knowledge of this benefit being conferred upon the FMERA officials as consideration for their approval of Netflix's bid, approving of a budget which included the sale of the Mega Parcel at subject in the SECOND RFOTP and the “FMERA Relocation Fee.” The Real Estate Committee, with knowledge of the \$3 Million “FMERA Relocation Fee” being conferred upon the FMERA officials by Netflix as consideration for their approval of Netflix's bid, filled out scoring cards approving of Netflix's bid and disproving of the bid of RDR Developments, LLC; which act was done as consideration for the benefit agreed to in “5” in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in “41”-“65” in violation of 18 USC 1962.

37.) On December 21, 2022, the FMERA Board met in a public meeting. During this meeting, Jay Coffey, Kara Kopach, Lillian Burry, Anthony Talerico, Jr. Steven Gallo, Tracy Buckley, Jamera Sirmans, and Jorge Santos voted to approve the Audit Committee's budget. Also on this date, Jay Coffey, Kara Kopach, Lillian Burry, Anthony Talerico, Jr. Steven Gallo, Tracy Buckley, Jamera Sirmans, and Jorge Santos voted to approve the Real Estate Committee's decision to award sale of the Mega Parcel at subject of the SECOND RFOTP to Netflix's Bid; which act was done as consideration for the benefit agreed to in “5” in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a

pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

38.) In furtherance of the enterprise described in "15" above, the FMERA officers described in "37" forewent the signing of the Purchase and Sale and Redevelopment Agreement with Netflix ("PSARA") until after members of the bid-rigging syndicate conspiracy described in "41"-"65" reviewed the entire finished film THWH.

The Hatchet Wielding Hitchhiker Film

39.) On or about January 10, 2023 at or around 12AM, in furtherance of the conspiracy and conduct of the enterprise; Netflix published THWH and broadcast it on www.netflix.com and all of Netflix's platforms around the world. Contained in the film was Romankow's slanderous false statement described in "5" above, and numerous other false statements bolstering it and in accord with the agreement, pursuant to said agreement, described in "5". The film also copied, displayed, broadcast, and made derivative works from; the following of COMPLAINANT's works, wilfully infringing thereon and damaging COMPLAINANT in his property interest therein conferred by 17 USC 106 and depriving him of his entitled monies from revenues therefrom:

- a.) "Dark Knight of The Soul" Copyright Registration Number PA 2-399-437
- b.) "Unmentionable" Copyright Registration Number PA 2-399-439
- c.) "This was never a rape trial" Copyright Registration Number PA 2-398-911
- d.) "Kai's Magic Muscles" Copyright Registration Number PA 2-398-909
- e.) "Smash, Smash, SUH-MASH!" Copyright Registration Number PA 2-398-110
- f.) "Smash, Smash, SUH-MASH!" Copyright Registration Number PA 2-398-664
- g.) "Movement" Copyright Registration Number PA 2-396-377
- h.) "Movement" Copyright Registration Number SR 953-342

Which wilful infringement was an act done as consideration for the benefit agreed to in "5" in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

The FMERA signs a PSARA with Netflix

40.) On January 13, 2023, because Romankow and other members of the bid-rigging syndicate conspiracy described in "41"-"65" had reviewed the finished film THWH and decided that it conformed to the narrative imposed by Romankow, the FMERA Officials executed the PSARA with Netflix through Matthew J Tevenan and Stephen Zegar; which act was done as consideration for the benefit agreed to in "5" in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962. As part of this agreement, Netflix committed \$55,000,000.00 as a payment for the mega parcel, and \$848,000,000.00 as the initial capital investment; which money was held by Netflix commingled with other assets in an FDIC bank at time of its commitment to the bid-rigging scheme and enterprise described in "5"; in use for the maintenance and operation of the BRS Enterprise described in "41"-"65"; and is the subject of a conspiracy to commit violations of 18 U.S.C. 1956 therewith, to wit: transactions designed to promote the unlawful activity described in "1"-"40" and to avoid reporting requirements imposed by State and Federal Law; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

RESPONDENTS' Bid Rigging Syndicate Conspiracy and Enterprise

41.) On COMPLAINANT's information and belief, Joseph J. Galfy, Jr. ("Galfy") was a military judge in the JAG Corps, stationed in West Germany during the early 1970s. He prosecuted homosexuals and suspected spies during the Cold War. During this time, he engaged in homosexual acts, and was recorded by the KGB doing so. The KGB used these recordings to blackmail and extort Galfy into providing information on cases pending before him, and to influence his decisions and actions thereon; putting Galfy under threat of the recordings being exposed, and thereafter under additional threat of his actions on behalf of the KGB being exposed. Galfy thereby became an unregistered foreign agent, and remained so upon his return to America. His brother, James Galfy, was a military policeman also stationed in West Germany at the same time as Galfy; who used his position and office to quash any investigations or prosecutions of Galfy for his homosexual acts, actions on behalf of the KGB, or provision of information regarding pending JAG Corps cases to the KGB. Upon Galfy and James Galfy's return to

America, James Galfy became a civilian police officer and continued to use his office and position to subvert and quash any investigations and prosecutions of Galfy for his actions in harboring KGB agents at his residence and arranging for them to photograph or otherwise record NJ Public Officials engaging in deviant sexual acts. Galfy, as an agent of the KGB, persuaded local and NJ State public officials to go on vacations to child sex tourism hotspots, whereat said officials were recorded by KGB agents engaging in sexual acts with minors. These recordings were thereafter used by Galfy, those associated in fact with him, and the KGB; and after the fall of the USSR, the FSB; to blackmail said officials into performance and nonperformance of official and nonofficial acts.

42.) On COMPLAINANT's information and belief, Joseph J. Galfy groomed and molested his friend Vincent Timoni's minor son, Michael; by inviting Michael Timoni ("Timoni") to watch pornography at Galfy's house while Galfy performed sexual acts on the minor Timoni. Galfy thereby cultivated a secrecy between the minor Timoni and himself that excluded Vincent; and exercised coercive control over Timoni, who professed to being heterosexual and would be deeply ashamed if he was revealed to have allowed Galfy to perform sexual acts upon himself, through the threatened blackmail of exposure. In this context, Galfy persuaded Timoni as an adult to accompany him on vacations to Bali to engage in child sex trafficking whilst there, soliciting minors for prostitution. Galfy collected blackmail material on Timoni in this way by photographing Timoni engaged in sexual acts with a child, both in Bali and also in Clark, NJ as described in "47" below; and thereafter conferring with Michael Timoni on or about 1/9/06; having a meeting of the minds and agreeing with each other that Timoni would join Galfy in the bid rigging syndicate conspiracy ("Bid Rigging Syndicate Conspiracy" or "BRS Conspiracy") and form an associated-in-fact Enterprise ("Bid Rigging Syndicate Enterprise" or "BRS Enterprise"); and that in furtherance of the BRS Enterprise, Timoni would make transactions to promote the unlawful activity of offering benefits as consideration for performance or nonperformance of acts in violations of NJSA 2C:27-2, -10, -11; which transactions were structured to avoid the reporting requirements of N.J.S.A. 52:13C-19 et seq., N.J.A.C. 19:25-1 et seq., N.J.S.A. 19:44A-1 et seq., 52 U.S.C. 30104 et seq. and 11 C.F.R. 104, 110 et seq. in violation of 18 U.S.C. 1956; ;

which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962.

43.) On COMPLAINANT's information and belief, Joseph J. Galfy persuaded Robert Ellenport to accompany him on vacations to Bali to engage in child sex trafficking whilst there, soliciting minors for prostitution. Galfy collected blackmail material on Ellenport in this way by photographing Ellenport engaged in sexual acts with a child, both in Bali and also in Clark, NJ as described in "47" below; and thereafter conferring with Ellenport on or about 12/11/99; having a meeting of the minds and agreeing with each other that Ellenport would join Galfy in the BRS Conspiracy; and that in furtherance of the BRS Enterprise, Ellenport would make transactions to promote the unlawful activity of offering benefits as consideration for performance or nonperformance of acts in violations of NJSA 2C:27-2,-10,-11; which transactions were structured to avoid the reporting requirements of N.J.S.A. 52:13C-19 et seq., N.J.A.C. 19:25-1 et seq., N.J.S.A. 19:44A-1 et seq., 52 U.S.C. 30104 et seq. and 11 C.F.R. 104, 110 et seq. in violation of 18 U.S.C. 1956; ; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962.

44.) On COMPLAINANT's information and belief, On or about 1/26/92, Theodore Romankow and Joseph J. Galfy, Jr. Conferred with each other, had a meeting of the minds, and Romankow agreed to join the BRS Conspiracy and BRS Enterprise, associated in fact, in which they would make a transactions to the campaigns of politicians and otherwise confer upon them benefits as consideration for performance or nonperformance of acts by that politician, in violation of N.J.S.A. 2C:27-2, -10, and -11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962; and to recruit politicians as lobbyists with such transactions as are structured to avoid the reporting requirements of N.J.S.A. 52:13C-19 et seq., N.J.A.C. 19:25-1 et seq., N.J.S.A. 19:44A-1 et seq., 52 U.S.C. 30104 et seq. and 11 C.F.R. 104, 110 et seq. in violation of 18 U.S.C. 1956; ; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962. In

furtherance of this enterprise, Romankow agreed to use his public offices of Union County Prosecutor, Waterfront Commission, Union County Board of Chosen Freeholders, and Union County Improvement Authority; to subvert, obstruct, and defeat investigations or prosecutions of criminal activity by members of this enterprise, in violation of 18 U.S.C. 1503, 1512, and N.J.S.A. 2C:30-2 as benefit as consideration for performance and nonperformance of acts in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962; to trade access to news stories to news outlets, journalists, and editors, as benefit as consideration for suppressing media coverage of criminal activities by members of the enterprise, in violation of N.J.S.A. 2C:27-2 and 2C:30-2; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962; and to facilitate bid-rigging schemes in which NJ State Government employees or agents, or persons or entities in whose welfare such NJ State Government employees or agents had an interest, are provided benefits as consideration for the performance or nonperformance of acts by such NJ State Government employees or agents in furtherance of such bid-rigging schemes, in violation of N.J.S.A. 2C:27-2, -10, -11, and 2C:30-2; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962. As part of this enterprise, Romankow and Galfy also agreed to create blackmail material on public officials, including but not limited to proof of public officials engaged in acts of child sex abuse or sexual assault; or in possession of child pornography and child sexual abuse materials; with which to intimidate or threaten officials and/or to offer the quashing of investigations or prosecutions related to such CSAM as benefit in consideration for performance or nonperformance of acts, and against reporting of the activities of the enterprise; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

45.) On COMPLAINANT's information and belief, on a date and time which will be ascertained with certainty through discovery, Romankow

and James McGreevey met, conferred with, and agreed with each other that McGreevey would join the Bid Rigging Syndicate Conspiracy, ratify their acts up to that point; and thereafter, In furtherance of the BRS Conspiracy and BRS Enterprise, Romankow made a transaction to James McGreevey of \$2,100 on 9/29/00, then Jeffrey K. Epstein met with and conferred with Romankow in regards to the BRS Conspiracy and BRS Enterprise on 7/20/01, thereby acquiring knowledge of the illegal activities thereof and agreeing to join the BRS Conspiracy and BRS Enterprise; and in furtherance thereof wilfully made a transaction of \$500 to McGreevey on 7/20/01, recruiting Romankow as a straw donor who in furtherance thereof personally made a transaction of \$2,600 to McGreevey on 7/24/01; and Romankow used his position in "3" to cause the NJAJ Money Launderers to make transactions to McGreevey, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; and Romankow used his position in "4" to cause the Money Laundering Network to make transactions to McGreevey, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; which transactions were structured to avoid the reporting requirements of N.J.S.A. 52:13C-19 et seq., N.J.A.C. 19:25-1 et seq. and N.J.S.A. 19:44A-1 et seq. in violation of 18 U.S.C. 1956; ; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; and Epstein thereby became associated in fact with the Bid rigging syndicate enterprise and a person acting as part of said enterprise. McGreevey accepted each of these transactions knowing they were offered as benefit as consideration for his performance or nonperformance of actions to persuade his appointees at the Port Authority of New York and New Jersey to grant permits, licenses, and authority to operate in the Teterboro Airport to Jeffrey K. Epstein and entities associated with him, including but not limited to Aviloop; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; and McGreevey thereby became associated in fact with the Bid rigging syndicate enterprise and a person acting as part of said enterprise. Romankow and McGreevey did so in full knowledge that Epstein was using the Teterboro airport to transport minors across

state lines in furtherance of his enterprise in sex trafficking to create blackmail material on public officials. Romankow and McGreevey used their public offices to quash investigations or prosecutions of Jeffrey K. Epstein or his associates and their activities at and through the Teterboro Airport. McGreevey was subsequently finally caught sexually harassing women, which behavior was the subject of blackmail material created on him by the Bid rigging syndicate enterprise, and resigned from public office. Epstein was finally caught and convicted for child sex trafficking, and hung himself in a jail cell. Romankow, Epstein, and McGreevey thereby engaged in transactions designed to promote the unlawful activity they were consideration for, and to avoid reporting requirements of State and Federal law, in violation of 18 U.S.C. 1956; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

46.) On COMPLAINANT's information and belief, on a date and time which will be ascertained with certainty through discovery, Romankow and Neil M. Cohen met, conferred with, and agreed with each other that Cohen would join the Bid Rigging Syndicate Conspiracy, ratify their acts up to that point; and thereafter, In furtherance of the Bid rigging syndicate enterprise, Romankow made transactions to Neil M. Cohen of \$1,500 on 3/13/01, \$300 on 11/06/01, \$2,500 on 11/5/01; and Romankow used his position in "3" to cause the NJAJ Money Launderers to make transactions to Neil M. Cohen, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; and Romankow used his position in "4" to cause the Money Laundering Network to make transactions to Neil M. Cohen, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; which transactions were structured to avoid the reporting requirements of N.J.S.A. 52:13C-19 et seq., N.J.A.C. 19:25-1 et seq. and N.J.S.A. 19:44A-1 et seq. in violation of 18 U.S.C. 1956; ; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962;; as benefit as consideration for his activities in the NJ State Legislature in furtherance of the goals of the Bid rigging syndicate enterprise; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise

pleaded in "41"-"65" in violation of 18 U.S.C. 1962. Cohen accepted each of these transactions knowing they were offered as benefit as consideration for his performance or nonperformance of actions to create blackmail on public officials by distributing child pornography inside of the NJ State Legislature; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; and thereby became associated in fact with the Bid rigging syndicate enterprise and a person acting as part of said enterprise. Romankow and Cohen thereby engaged in transactions designed to promote the unlawful activity they were consideration for, and to avoid reporting requirements of State and Federal law, in violation of 18 U.S.C. 1956; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962. In 2008, Cohen was finally caught and subsequently convicted for distributing child pornography in the NJ State Legislature; but Romankow and Scutari used their public offices in furtherance of the Bid rigging syndicate enterprise to quash any investigation or prosecution of individuals to which Cohen was distributing the child pornography, in violation of N.J.S.A. 2C:30-2, 18 U.S.C. 1503; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962. Romankow subsequently used his offices to barter the benefit of access to newsworthy Union County Government events to news outlets, editors, and journalists as consideration for removal of the following news articles from publication:

- a.) "McAlpin, John P. (July 24, 2008) "Lawmaker investigated for child porn, sources say." The Record. Bergen, New Jersey: Gannett Company.
- b.) Margolin, Josh; Schwaneberg, Robert (July 24, 2008) "Assemblyman Neil Cohen under child porn investigation". The Star Ledger. Newark, New Jersey
- c.) Friedman, Matt (July 24, 2008) "Cohen under investigation for child pornography". PolitickerNJ. New York, New York: Observer Media
- d.) Young, Elise (July 28, 2008) "Cohen resigns following porn discovery" The Record Bergen, NJ:Gannett Co.

- e.) Friedman, Matt (July 28, 2008) "Cohen resigns" PolitickerNJ New York, NY: Observer Media
- f.) "Dems choose Cohen's successor" (August 21, 2008) The Press of Atlantic City. Pleasantville, NJ: BH Media Group Holdings
- g.) Toutant, Charles (April 14, 2010) "NJ Lawyer pleads guilty to child pornography charge". New Jersey Law Journal. New York, NY: ALM Media LLC
- h.) Milgram, Anne "Former New Jersey assemblyman Neil M. Cohen faces new child pornography charge in connection with computer in law office"

These acts were performed for the benefit as consideration described in "41"-"46"; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962

47) On COMPLAINANT's information and belief, In furtherance of the enterprise, Romankow also used his position and office to create the Child Victim Advocacy Center, and thereafter to influence the directors and officers thereof because of his conferring of the benefit of the creation of said center to said officials in consideration for the officials providing him access to the files and information created by the Center. Romankow used his influence and access to said files and information to select underage victims of sexual abuse who are susceptible to further abuse, and provides the identities and personal information of same to police gangs known as "The Family" operating within the Union County Police Department and Elizabeth Police Department; as benefit as consideration for The Family providing blackmail material on NJ State or Federal officials, politicians and wealthy individuals. The Family thereafter locates the minors, contacts them, and harbors them at UCPD and EPD officers' residences for the purpose of performing sexual acts with members of The Family and with NJ State or Federal officials, politicians and wealthy individuals. The Family thereafter provides Romankow, as a benefit as consideration for his in kind provision of the information of the minors, with photographs and other recordings of said NJ State or Federal officials, politicians and wealthy individuals engaged in sexual acts with the minors, which evidence is thereafter used as blackmail by the BRS Conspiracy individuals associated in fact within the BRS enterprise to extort the politicians,

wealthy individuals, and officials into performance and nonperformance of official and nonofficial acts, including but not limited to engaging in straw donor activities and transactions to State and Federal political campaigns, advising and executing appointment of State and Federal judiciary and public officials, and voting on bills to create or strike down laws in State and Federal legislature. Romankow also corruptly persuaded Cohen pursuant to Cohen's agreement and participation in the bid rigging syndicate conspiracy described in "44"; to create a 24 hour tipline for reporting child porn; which tipline generated information on child sexual abuse materials ("CSAM") throughout the State of New Jersey. Instead of prosecuting the adults who perpetrated CSAM production, Romankow used information of CSAM activity by businessmen and politicians to blackmail them; into providing benefits to himself and the bid rigging syndicate conspiracy, including money laundering, contracts for services, and votes on bills or otherwise; as consideration for nonperformance of his official duties as prosecutor, and for performance of acts of threatening the children who were subjects of CSAM with criminal charges for production of CSAM if they disclosed the businessmen or politician's involvement with CSAM; in violation of NJSA 2C:27-2,-10,-11, and 30-2; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962. Romankow also used his office as head prosecutor to blackmail children who reported, or who were identified through reports of, CSAM; by threatening to charge the children with criminal offenses for producing CSAM, unless the children submitted to being sex trafficked by the child sex trafficking network described in "47"; in violation of NJSA 2C:30-2; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

Romankow engaged in these activities as an unregistered foreign agent, on behalf of the FSB.

48.) On COMPLAINANT's information and belief, In furtherance of the enterprise, Romankow used his positions and offices in the UCPO and Waterfront Commission to obstruct and quash any investigations or prosecutions of Maersk for human trafficking of minors through the APM terminal in Elizabeth, NJ. Romankow also worked with Jeffrey K. Epstein to quash any investigations or prosecutions of Epstein for the

transportation of said minors from Maersk container ships at the APM terminal, to the Teterboro Airport, wherefrom Epstein transported said minors across State lines for the purpose of sex trafficking. To wit: so that Epstein, in furtherance of the enterprise, could photograph or otherwise record the minors engaged in sexual acts with American State or Federal officials, politicians and wealthy individuals, as well as foreign officials; and thereafter use the recordings as blackmail to extort the politicians, wealthy individuals, and officials by offering the benefit of non-publishing said recordings as consideration for performance and nonperformance of official and nonofficial acts, including but not limited to engaging in straw donor activities and transactions to State and Federal political campaigns, advising and executing appointment of State and Federal judiciary and public officials, and voting on bills to create or strike down laws in State and Federal legislature; in violation of NJSA 2C:27-2,-10,-11 and/or 18 U.S.C. 233; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41" "65" in violation of 18 U.S.C. 1962. Epstein and Romankow engaged in these activities as unregistered foreign agents, on behalf of the FSB, in violation of the Espionage Act.

49.) On COMPLAINANT's information and belief, on a date and time which will be ascertained with certainty through discovery, Romankow and Linda D. Stender met, conferred with, and agreed with each other that Stender would join the Bid Rigging Syndicate Conspiracy, ratify their acts up to that point; and thereafter, In furtherance of the Bid rigging syndicate enterprise, Romankow made a transaction to Linda D. Stender of \$2,500 on 6/26/01; Galfy made transactions to Stender of \$300 on 10/18/04, \$35 on 5/4/05, \$300 on 6/24/05, \$300 on 3/31/05, \$500 on 12/30/05, and \$250 on 10/24/06; Robert Ellenport made transactions to Stender of \$1,000 on 03/03/06, \$250 on 06/30/06, \$500 on 09/26/06, \$300 on 02/28/07, \$500 on 12/31/07, and \$500 on 09/29/08; Michael Timoni made transactions to Stender of \$500 on 01/10/06, \$500 on 10/30/06, and \$500 on 12/28/07; Neil M. Cohen made transactions to Stender of \$1,000 on 12/20/05, \$1,000 on 6/29/06, and \$1,000 on 09/29/06; and Romankow used his position in "3" to cause the NJAJ Money Launderers to make transactions to Linda D. Stender, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; and Romankow used his position in "4" to

cause the Money Laundering Network to make transactions to Linda D. Stender, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; which transactions were structured to avoid the reporting requirements of N.J.S.A. 52:13C-19 et seq., N.J.A.C. 19:25-1 et seq. and N.J.S.A. 19:44A-1 et seq. in violation of 18 U.S.C. 1956; ; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; as benefit as consideration for her voting on bills in the NJ State Legislature in ways that would advance the goals of the Bid rigging syndicate enterprise; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962. Stender accepted each of these transactions knowing they were offered as benefit as consideration for her performance or nonperformance of actions; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; and thereby became associated in fact with the Bid rigging syndicate enterprise and a person acting as part of said enterprise. All transactions in 2005 and 2006 were specifically for her vote on a bill proposed by Neil M. Cohen creating a 24-hour law enforcement hotline to report child pornography, by which hotline Cohen intended to, and did, amass a collection of child pornography to use in his creation of blackmail material against fellow members of the State Legislature. In 2015, Stender was caught attempting to misappropriate public funds from Habitat for Humanity in furtherance of the Bid rigging syndicate enterprise; but Romankow used his public office in furtherance of the Bid rigging syndicate enterprise to quash any investigation or prosecution of Stender, in violation of N.J.S.A. 2C:30-2, 18 U.S.C. 1503; which acts were performed for the benefit as consideration described in "41"-"49"; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962.

50.) On COMPLAINANT's information and belief, on a date and time which will be ascertained with certainty through discovery, Romankow

and Nicholas Scutari met, conferred with, and agreed with each other that Scutari would join the Bid Rigging Syndicate Conspiracy, ratify their acts up to that point; and thereafter, In furtherance of the Bid rigging syndicate enterprise, Romankow made transactions to Nicholas Scutari of \$1,000 on 8/2/14, \$500 on 9/27/16, \$500 on 10/18/17, \$500 on 2/9/21, and \$2,500 on 9/10/21; Galfy made transactions to Scutari of \$500 on 10/20/03, and \$500 on 4/19/06; Michael Timoni made transactions to Scutari of \$500 on 03/30/09, and \$500 on 05/04/10; and Romankow used his position in "3" to cause the NJAJ Money Launderers to make transactions to Nicholas Scutari, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; and Romankow used his position in "4" to cause the Money Laundering Network to make transactions to Nicholas Scutari, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; which transactions were structured to avoid the reporting requirements of N.J.S.A. 52:13C-19 et seq., N.J.A.C. 19:25-1 et seq. and N.J.S.A. 19:44A-1 et seq. in violation of 18 U.S.C. 1956; ; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; as benefit as consideration for his activities in the NJ State Legislature in furtherance of the goals of the Bid rigging syndicate enterprise; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962.. Scutari accepted each of these transactions knowing they were offered as benefit as consideration for his performance or nonperformance of actions; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; and thereby became associated in fact with the Bid rigging syndicate enterprise and a person acting as part of said enterprise. All of Romankow's transactions to Scutari in 2016 and 2017 were intended, offered, and received knowingly and wilfully as benefit as consideration for Scutari advising Governor Phil Murphy, and using his public office to influence Phil Murphy, to appoint Robert A Kirsch as a judge of the NJ Superior Court. In furtherance of the Bid rigging syndicate enterprise, Scutari

advanced Bill S-1714 to rewrite Local Public Contract Laws (LPCL); so as to protect Romankow and the Union County Improvement Authority which he was an officer of, from liability arising out of Romankow's use of his UCIA office to engage in bid-rigging and violation of NJ LPCL requirements for public bids. Romankow also used his public office in furtherance of the Bid rigging syndicate enterprise to quash any investigation or prosecution of Scutari in regards to his misappropriating public funds by receiving pay for a "no-show" job, or receiving transactions to Scutari's consulting firm, ABC, Inc. 3, which were designed to avoid the reporting requirements of N.J.S.A. 52:13C-19 et seq., N.J.A.C. 19:25-1 et seq. and N.J.S.A. 19:44A-1 et seq. in violation of 18 U.S.C. 1956; in violation of N.J.S.A. 2C:30-2, 18 U.S.C. 1503; acts were performed for the benefit as consideration described in "41"-"50"; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962.

51.) On COMPLAINANT's information and belief, In furtherance of the Bid rigging syndicate enterprise, during the period from 2010 to 2013, Romankow used his public offices to quash investigations into the theft of public funds and property at the 2010 MusicFest festival in Union County; and into the theft of public property, including but not limited to generators, from the 2012 NJ State Emergency Response to Hurricane Sandy; then subsequently to harass local reporter Tina Renna with malicious prosecution for attempting to report on Romankow's cover-up of said thefts; in violation of NJSA 2C:30-2; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962

52.) On COMPLAINANT's information and belief, on a date and time which will be ascertained with certainty through discovery, Romankow, Jon Deutsch and Albert Cernadas, Jr. met, conferred with, and agreed with each other that Jon Deutsch and Albert Cernadas, Jr. would join the Bid Rigging Syndicate Conspiracy, ratify their acts up to that point. In furtherance of the Bid rigging syndicate enterprise, after the Federal Bureau of Investigation arrested over a hundred racketeers at the Elizabeth International Port, during the period from 2011 to 2013, Romankow used his public offices to quash investigations or

prosecutions of his subordinates Jon Deutsch and Albert Cernadas, Jr. for interfering with the federal investigation of the racketeers. To wit: Waterfront Commission officer Jon Deutsch leaked information about the investigation to UCPO prosecutor Albert Cernadas, Jr.; whose father, Albert "The Bull" Cernadas, Sr., was president of the International Longshoreman's Association Local 1235 and an associate of La Cosa Nostra's "Genovese" Crime Family, and was indicted as part of the FBI's investigation into racketeers at the Elizabeth International Port. Albert Cernadas, Jr. then informed his father, Albert Cernadas, Sr.; who disseminated the information amongst the subjects of the investigation and thereby assisted them in obstructing the federal official proceeding involving them, and in tampering with evidence and witnesses associated therewith, in violation of 18 U.S.C. 1503, 1512; which acts were done for the benefit as consideration of the International Longshoreman's Union Local 1235 and La Cosa Nostra performing and nonperforming acts to facilitate the trafficking of minors described in "44"-"48" above, such as offloading containers in which the minors were held from Maersk ships and bypassing customs; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962

53.) On COMPLAINANT's information and belief, on a date and time which will be ascertained with certainty through discovery, Romankow and Rodemar Perez met, conferred with, and agreed with each other that Perez would join the Bid Rigging Syndicate Conspiracy, ratify their acts up to that point. Romankow was part of the Board of Directors of Trinitas Hospital in Elizabeth, NJ from May of 2013 to May of 2019. In furtherance of the enterprise, beginning on May 30, 2013, Romankow used his position on said Board to approve of kickbacks, remuneration, and other benefits to Rodemar Perez, as consideration for Perez using his office as Union County Jail Psychiatrist to discredit COMPLAINANT by fabricating reports and using his supervisory position over other mental health staff within the Union County Jail to enforce a policy or custom of fabricating reports about COMPLAINANT so as to discredit him; and to deny him accommodation or treatment for his Post-Traumatic Stress Disorder; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity

as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

54.) On COMPLAINANT's information and belief, on a date and time which will be ascertained with certainty through discovery, Romankow and Phil Murphy met, conferred with, and agreed with each other that Murphy would join the Bid Rigging Syndicate Conspiracy, ratify their acts up to that point; and thereafter, In furtherance of the Bid rigging syndicate enterprise, Romankow made transactions to Phil Murphy of \$2,500 on 4/23/17, \$1,800 on 6/2/17, \$1,000 on 6/30/17, \$2,500 on 10/21/17, and \$1,000 on 10/8/20; and Romankow used his position in "3" to cause the NJAJ Money Launderers to make transactions to Phil Murphy, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; and Romankow used his position in "4" to cause the Money Laundering Network to make transactions to Phil Murphy, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; which transactions were structured to avoid the reporting requirements of N.J.S.A. 52:13C-19 et seq., N.J.A.C. 19:25-1 et seq. and N.J.S.A. 19:44A-1 et seq. in violation of 18 U.S.C. 1956; ; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; as benefit as consideration for his activities as the NJ State Governor in furtherance of the goals of the Bid rigging syndicate enterprise; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962. Murphy accepted each of these transactions knowing they were offered as benefit as consideration for his performance or nonperformance of actions; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; and thereby became associated in fact with the Bid rigging syndicate enterprise and a person acting as part of said enterprise. In furtherance of the Bid rigging syndicate enterprise, Murphy signed Bill S-1714 to rewrite Local Public Contract Laws (LPCL); so as to protect Romankow and the Union County Improvement Authority which he was an officer of, from liability arising out of Romankow's use of his UCIA office to

engage in bid-rigging and violation of NJ LPCL requirements for public bids; in violation of N.J.S.A. 2C:27-2, 30-2; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

55.) On COMPLAINANT's information and belief, on a date and time which will be ascertained with certainty through discovery, Romankow and Robert Menendez met, conferred with, and agreed with each other that Menendez would join the Bid Rigging Syndicate Conspiracy, ratify their acts up to that point; and thereafter, in furtherance of the Bid rigging syndicate enterprise, Romankow made transactions to Robert Menendez of \$1,000 on 6/30/18, \$1,000 on 9/18/18, \$500 on 10/24/18, \$2,000 on 10/21/19, and \$1,000 on 7/2/21; Robert Ellenport made transactions to Robert Menendez of \$500 on 10/24/06 and \$200 on 10/17/18; and Romankow used his position in "3" to cause the NJAJ Money Launderers to make transactions to Robert Menendez, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; and Romankow used his position in "4" to cause the Money Laundering Network to make transactions to Robert Menendez, the amount, date, time, and identity of which will be ascertained with certainty upon discovery; which transactions were structured to avoid the reporting requirements of 52 U.S.C. 30104 et seq. and 11 C.F.R. 104, 110 et seq. in violation of 18 U.S.C. 1956; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; as benefit as consideration for his activities in the U.S. Senate in furtherance of the goals of the Bid rigging syndicate enterprise; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962. Menendez accepted each of these transactions knowing they were offered as benefit as consideration for his performance or nonperformance of actions; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; and thereby became associated in fact with the Bid rigging syndicate enterprise and a person acting as part of said

enterprise. All of Romankow's transactions to Menendez in 2018 through 2021 were intended, offered, and received knowingly and wilfully as benefit as consideration for Menendez advising; and using his public office to influence; whichever acting President of the United States was in office at the end of Robert A Kirsch's tenure as State judge, to appoint Kirsch as a District Judge for the District of New Jersey. In furtherance of the Bid rigging syndicate enterprise, Menendez used his public office as U.S. Senator to advise and influence the President to appoint Kirsch as a District Judge for the District of New Jersey in 2023. Romankow also used his public office in furtherance of the Bid rigging syndicate enterprise to quash any investigation or prosecution of Menendez in regards to his receiving transactions to Menendez's consulting firm, ABC, Inc 4; which transactions were structured to avoid the reporting requirements of 52 U.S.C. 30104 et seq. and 11 C.F.R. 104, 110 et seq. in violation of 18 U.S.C. 1956; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

56.) On COMPLAINANT's information and belief, On or about September 24, 2011, which date and time will be ascertained with certainty through discovery; Christine P. O'Hearn ("O'Hearn") and Robert Menendez ("Menendez") met, conferred with, and agreed with each other that O'Hearn would join the Bid Rigging Syndicate Conspiracy, ratify their acts up to that point and thereafter, and if O'Hearn showed herself to be favorable to Bid Rigging Syndicate Enterprise interests over the course of a decade by vigorously defending, on top of the acts of sexual molestation of minors she's already defended, acts of institutional racism and police misconduct; and also perform 2 acts of violating 18 U.S.C. 1956 by making transactions of \$2,500 each to Menendez's campaign designed to avoid reporting requirements of 52 U.S.C. 30104 et seq. and 11 C.F.R. 104, 110 et seq.; knowing that Menendez was an unregistered foreign agent; and if she agreed thereafter to rule in accord with bid rigging syndicate conspiracy directives; Menendez would, as an unregistered foreign agent, reward her vigorous defense of such acts and money laundering with a nomination to the federal bench. Christine P. O'Hearn made two transactions pursuant to this agreement on 9/25/11 of \$2,500 each, for a total of \$5,000; which transactions were structured to avoid the

reporting requirements of 52 U.S.C. 30104 et seq. and 11 C.F.R. 104, 110 et seq. in violation of 18 U.S.C. 1956; ; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962; as a benefit as consideration for Menendez recommending her for a nomination to the Federal; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962, which Menendez received knowing it was intended as such and that it was in violation of federal election law to receive such amounts in aggregate; in violation of N.J.S.A. 2c:27-2,-10,-11; and 18 U.S.C. 233; which transactions were designed to conceal the unlawful activity and to avoid reporting requirements heretofore described in violation of 18 USC 1956; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

57.) On COMPLAINANT's information and belief, Pursuant to the agreement in "56" above, O'Hearn did, in fact, show Menendez her propensity to defend bid rigging syndicate enterprise activities by, in addition to defending sexual molestation of minors, also defending institutional racism and police misconduct, from 9/24/11 until her nomination to the Federal Bench on a date that will be ascertained with certainty through discovery but is believed to be June 1, 2021. On that date, pursuant to the agreement in "56" above, Menendez recommended O'Hearn's nomination to the federal bench, and used his office while an unregistered foreign agent to obtain her nomination to the bench; while concealing his activities as an unregistered foreign agent and member of the bid rigging syndicate conspiracy from the President of the United States and his fellow senators. Because of Menendez's recommendation and lobbying, O'Hearn was appointed to be a federal district judge on a date that will be ascertained with certainty through discovery but is believed to be June 22, 2021.

58.) On COMPLAINANT's information and belief, On or about 6/5/14, which date will be ascertained with certainty through discovery, Madeline Cox-Arleo (Arleo) and Menendez met, conferred with, and agreed with each other that Arleo would join the bid rigging syndicate conspiracy, ratify their acts up to that point, and thereafter act and rule

as a district judge under direction from bid rigging syndicate conspiracy members; for the benefit as consideration of Menendez using his office to obtain for her a nomination and appointment to the federal bench; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962. Pursuant to this agreement, Menendez did, in fact, for said benefit as consideration use his office to cause Arleo to be nominated to the federal bench on June 26, 2014; and thereafter lobbied to secure her appointment. These acts were performed for the benefit as consideration described in "58"-"91"; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962.

58.) On COMPLAINANT's information and belief, On a date and time which will be ascertained with certainty through discovery; on information and belief, Arleo and Cathy L. Waldor (Waldor) met, conferred with, and agreed with each other that Waldor would join the BRS Conspiracy, ratify their acts up to that point, and thereafter act and rule as a magistrate judge under direction from the BRS Conspiracy; for the benefit as consideration of Arleo using her office to appoint Waldor as a magistrate judge to the USDC-DNJ. Pursuant to this agreement, Arleo did, in fact, appoint Waldor to the federal bench as a magistrate judge, on a date and time which will be ascertained with certainty through discovery.

59.) On COMPLAINANT's information and belief, On December 23, 2015, COMPLAINANT filed a complaint in the US District Court for the District of New Jersey; which by chance was assigned to Arleo. On or about the same day, which date and time will be ascertained with certainty through discovery, both Romankow and Menendez contacted, conferred with, and agreed with Arleo that, pursuant to her agreement, Arleo would act extrajudicially and through her office as a district judge to delay, obstruct, and impede COMPLAINANT's federal habeas proceedings which would thereafter be assigned to her under DNJ L.Civ.R. 40.1: because of her happenstance initial assignment. These acts were performed for the benefit as consideration described in "58"-"91"; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in

furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 U.S.C. 1962

61.) On COMPLAINANT's information and belief, On June 22, 2022, COMPLAINANT filed a petition for writ of habeas corpus in the USDC-DNJ; which was automatically assigned to Arleo under DNJ L.Civ.R. 40.1 because of her previously presiding over an action involving the same set of facts.

62.) On COMPLAINANT's information and belief, On or about June 22, 2022, which date will be ascertained with certainty through discovery, as consideration for the benefit of nomination conferred upon her described in "58" above; Arleo performed the act in her office as the senior district judge of the USDC-DNJ Newark vicinage, of issuing a clandestine unwritten standing order and policy or custom, to the administrative staff of the Newark Vicinage: that all of COMPLAINANT's filings were to be intercepted at the USPS processing facility and obstructed, and that his filings were not to be filed onto the docket unless she first cleared them. She also specifically instructed and conspired with her administrative staff to act as her agents and in that capacity commit mail fraud by writing false delivery dates on return receipts and sending them through the mails to COMPLAINANT, to make COMPLAINANT appear to be tardy in his filings. Arleo engaged in this conduct of violating NJSA 2C:27-2,-10,-11, and conspiring to violate 18 U.S.C. 1341, in furtherance of the bid rigging syndicate enterprise, and as an agent thereof and of her coconspirators; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

63.) During the period from June 22, 2022 until December 2, 2022, for the benefit of the nomination described in "58" above offered as consideration therefor, Arleo performed the act in her office as the senior judge of the USDC-DNJ Newark Vicinage, of refusing to perform her duty of issuing a show cause order within a reasonable time, until mandamus from the 3rd Circuit was imminent. Arleo engaged in this conduct of violating NJSA 2C:27-2,-10,-11 in furtherance of the bid rigging syndicate enterprise, and as an agent thereof and of her BRS coconspirators; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

64.) On COMPLAINANT's information and belief, On or about 8/10/23, Hon. Michael E. Farbiarz, U.S.D.J. expressed an unwillingness to participate in the conspiracy in "62", by directing entry of evidence of obstruction of the mail associated therewith onto the docket in COMPLAINANT's habeas case. On that same day, Arleo then, as agent of her BRS coconspirators and in furtherance of the bid rigging syndicate enterprise, conferred with O'Hearn and had a meeting of the minds and agreed with O'Hearn that O'Hearn would use her pre-existing relationship with Bumb to persuade Bumb to accept an offer of the benefit of following Bumb's ruling usurping the 3rd Circuit's judicial authority by holding Fed. R. Civ. P. to be inappropriate for habeas proceedings, by issuing an order denying COMPLAINANT's pending motion for summary judgment without reading the moving papers, as consideration for Bumb reassigning the case to her. Arleo and O'Hearn also agreed in such capacity as heretofore described that thereafter O'Hearn would assume the role Arleo previously occupied in furtherance of the bid rigging syndicate enterprise, as described in "60" above.

65.) On COMPLAINANT's information and belief, On or about 8/14/23, which date and time will be ascertained with certainty through discovery; O'Hearn and Chief Judge Renee Marie Bumb ("Bumb") met, conferred wit, and agreed with each other, that O'Hearn would offer Bumb the benefit of following Bumb's ruling usurping the 3rd Circuit's judicial authority by holding Fed. R. Civ. P. 56 to be inapplicable to habeas corpus proceedings, by issuing an order denying COMPLAINANT's pending motion for summary judgment without reading the moving papers, as consideration for Bumb reassigning COMPLAINANT's habeas case to her. Pursuant to this agreement, Bumb reassigned the case to O'Hearn on 8/14/23 at 1:10pm; and without reading the moving papers, O'Hearn denied COMPLAINANT's motion for summary judgment on 8/15/23 at 10:26am citing Bumb's usurpative decision; which benefits as consideration for such acts were offered and received in violation of NJSA 2C:27-2,-10,-11. O'Hearn and Bumb engaged in this conduct of violating NJSA 2C:27-2,-10,-11 in furtherance of the bid rigging syndicate enterprise and as agents thereof and of the BRS coconspirators; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in

furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

USDC-DNJ Obstructionists

66.) The institutional mailing system where COMPLAINANT is confined at NJ State Prison requires him to fill out a "Form CO-30A" Postage remit for each outgoing piece of legal mail COMPLAINANT send. COMPLAINANT can select to send legal mail via certified mail with or without return receipt requested; but COMPLAINANT must personally fill out the "PS Form 3800" and "PS Form 3811"; and affix each to the piece of mail. The housing unit officer verifies that postage, and if selected the PS Form 3800 and PS Form 3811, is affixed; and that the name and address on each form, including the CO-30A, matches the name and address written on the piece of mail. Then, if they do match, the housing unit officer signs and witnesses the CO-30A, and logs the piece of mail into the unit officer's logbook. That same officer then delivers that mail to the postbox in the rotunda of the NJSP West Compound, which box is emblazoned with the logo of the US Postal Service.

67.) On 03/03/23, COMPLAINANT sent COMPLAINANT's motion to recuse Judge Robert A Kirsch using the institutional mailing system at NJSP, to the DNJ. COMPLAINANT have since lost the originals of COMPLAINANT's CO-30A forms evidencing this, but copies exist and are attached to COMPLAINANT's "Declaration in Support of Mandamus" filed in the USCA-3rd Cir. at Dkt. No. 23-1773; which COMPLAINANT incorporate by reference herein.

68.) The US Postal Service ("USPS") has a website, "<https://www.usps.com>". On this website, a person can enter the tracking number of a piece of certified mail; and in reply, the USPS will display the current tracking history and status for that piece of mail. This information is publically posted by a Federal Government office on its website.

69.) COMPLAINANT received a return receipt in the due course of mail from COMPLAINANT's Rule 59 motion COMPLAINANT sent to the USDC-DNJ Newark vicinage, in the case "McGillvary v Galfy et al", Dkt No 2:21-cv-17121-MCA-CLW. The tracking number for the certified mail associated with this return receipt, 70162070000105810521, on USPS.com shows that it was delivered to the Clerk of the Court on "8/15/22. However, a DNJ official wrote the false delivery date "8/16/22"

on the return receipt, knowing the falsity of that misrepresentation at the time it was made, and sent it to COMPLAINANT through the mails, intending for COMPLAINANT to rely upon it. That DNJ official performed that act acting as an agent and/or employee of Arleo, who principally performed the act of 18 USC 1343 through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above.

70.) COMPLAINANT sent COMPLAINANT's motion for extension of time to file COMPLAINANT's habeas reply on April 5, 2023 to the DNJ via USPS certified mail. The tracking number for the certified mail, 70201810000155834962, on USPS.com still shows, to this day, that the piece of mail is "awaiting delivery scan"; despite the document already having been filed onto the docket on April 13, 2023; because a DNJ official intercepted and obstructed the mail in violation of 18 USC 1700 et seq pursuant to the standing order described in "62"; which act was performed as agent of Arleo pursuant to said order. Arleo principally performed this act through agency as BRS Coconspirator in furtherance of the BRS enterprise, for the benefit as consideration described in "58"; in violation of NJSA 2C:27-2,-10,-11 as part of a pattern of racketeering activity as defined by 18 USC 1961 and as prohibited by 18 USC 1962.

71.) The Rule 59 motion described in "69" was heard and decided by the same Judge Arleo who presided over COMPLAINANT's habeas case; McGillvary v Davis, Dkt No 2:22-cv-04185-MCA-CLW (USDC-DNJ)(Hereinafter, "habeas case"); from its inception until 5/24/23. The motion was fully briefed and perfected on September 13, 2022. Judge Arleo waited until the day before the Respondent in the habeas case was due to file their answer to the show cause order, 9/29/23, to rule upon and enter her order denying the Rule 59 motion. Because of Judge Arleo's timing of her decision, COMPLAINANT was faced with urgent deadlines in the appeal of the Rule 59 motion, and the reply to the habeas case. In addition to the doubled deadline, Judge Arleo refused to rule upon the motion for extension of time until it was ultimately denied, 4 months, 2 judges, 2 mandamus petitions, and a vicinage later: for mootness. Judge Arleo's performance of the act of timing of her decision and nonperformance of the act of ruling on the motion for

extension of time; were done as BRS Coconspirator and each designed to maximize the prejudice to COMPLAINANT in his ability to litigate his habeas petition for the benefit of the consideration described in "58"; in violation of NJSA 2C:27-2,-10,-11 as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS Enterprise as prohibited by 18 USC 1962.

72.) COMPLAINANT sent COMPLAINANT's motion for summary judgment in the habeas case on April 5, 2023 to the DNJ via USPS certified mail. The tracking number for the certified mail, 70201810000155834955, on USPS.com still shows, to this day, that the piece of mail is "moving through the network"; and at a USPS processing facility; despite the document already having been filed onto the docket on May 15, 2023; because a DNJ official intercepted and obstructed the mail in violation of 18 USC 1700 et seq pursuant to the standing order described in "62"; which act was performed as agent of Arleo pursuant to said order. Arleo principally performed this act through agency as BRS Coconspirator in furtherance of the BRS enterprise, for the benefit as consideration described in "58"; in violation of NJSA 2C:27-2,-10,-11 as part of a pattern of racketeering activity as defined by 18 USC 1961 and as prohibited by 18 USC 1962.

73.) On 5/8/23, COMPLAINANT sent manila envelopes each containing COMPLAINANT's habeas traverse and reply, as well as COMPLAINANT's motion for summary judgment described in "72" above, to the USDC-DNJ's Camden, Trenton, and Newark vicinages. COMPLAINANT included COMPLAINANT's motion for summary judgment because it had still not been filed by the DNJ over a month after COMPLAINANT sent it. COMPLAINANT sent each of these envelopes via USPS certified mail, with only the Newark vicinage selected for return receipt requested. The tracking numbers show on USPS.com that 70201810000155834963 was delivered to the Camden vicinage on 5/12/23; that 70201810000155834887 was delivered to the Trenton vicinage on 5/15/23; and that 70201810000155834870 was delivered to the Newark vicinage on 5/12/23.

74.) COMPLAINANT received a return receipt in the due course of mail from COMPLAINANT's manila envelope described in "73" which COMPLAINANT sent to the USDC-DNJ Newark vicinage. The tracking number for the certified mail associated with this return receipt, 70162070000155834870, on USPS.com shows that it was delivered to

the Clerk of the Court on "5/12/23. However, a DNJ official wrote the false delivery date "5/15/23" on the return receipt, knowing the falsity of that misrepresentation at the time it was made, and sent it to COMPLAINANT through the mails, intending for COMPLAINANT to rely upon it. That DNJ official performed that act acting as an agent and/or employee of Arleo, who principally performed the act of 18 USC 1343 through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above.

75.) After all 3 vicinages received COMPLAINANT's motion for summary judgment, 40 days after COMPLAINANT first sent it to the Newark vicinage, it was finally entered onto the docket on 5/15/23.

76.) On 5/15/23, COMPLAINANT sent a motion to withdraw COMPLAINANT's motion to recuse Judge Kirsch in the habeas case to the DNJ via USPS certified mail, return receipt requested. The tracking number for the certified mail, 70201810000155835006, on USPS.com shows that this piece of mail was delivered on 5/22/23.

77.) COMPLAINANT received a return receipt in the due course of mail from COMPLAINANT's motion to withdraw COMPLAINANT's motion to recuse Judge Kirsch COMPLAINANT sent to the USDC-DNJ Newark vicinage, described in "76" above. The tracking number for the certified mail associated with this return receipt, 70162070000105815006, on USPS.com shows that it was delivered to the Clerk of the Court on 5/22/23. However, a DNJ official wrote the false delivery date "5/23/23" on the return receipt, knowing the falsity of that misrepresentation at the time it was made, and sent it to COMPLAINANT through the mails, intending for COMPLAINANT to rely upon it. That DNJ official performed that act acting as an agent and/or employee of Arleo, who principally performed the act of 18 USC 1343 through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above.

78.) Despite its delivery on 5/22/23 described in "76" above; and the mail fraud committed by Arleo's agent described in "77" above; this motion to withdraw was never filed onto the docket in the habeas case; because a DNJ official wilfully committed nonperformance of the act of

filing it. That DNJ official's nonperformance of that act was as an agent and/or employee of Arleo, who principally nonperformed the act through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above. The District Court ruled on the motion which COMPLAINANT sought to withdraw on 8/15/23, denying it.

79.) On 5/23/23, COMPLAINANT sent a motion to withdraw COMPLAINANT's IFP application in the habeas case to the DNJ via USPS certified mail, return receipt requested. The tracking number for the certified mail, 70201810000155832739, on USPS.com shows that this piece of mail was delivered on 6/5/23.

80.) COMPLAINANT received a return receipt in the due course of mail from COMPLAINANT's motion to withdraw COMPLAINANT's ifp application in the habeas case which COMPLAINANT sent to the USDC-DNJ Newark vicinage, described in "79" above. The tracking number for the certified mail associated with this return receipt, 70162070000105812739, on USPS.com shows that it was delivered to the Clerk of the Court on 6/5/23. However, a DNJ official wrote the false delivery date "6/6/23" on the return receipt, knowing the falsity of that misrepresentation at the time it was made, and sent it to COMPLAINANT through the mails, intending for COMPLAINANT to rely upon it. That DNJ official performed that act acting as an agent and/or employee of Arleo, who principally performed the act of 18 USC 1343 through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above.

81.) Despite its delivery on 6/5/23 described in "79" above; and the mail fraud committed by Arleo's agent described in "80" above; this motion to withdraw was never filed onto the docket in the habeas case; because a DNJ official wilfully committed nonperformance of the act of filing it. That DNJ official's nonperformance of that act was as an agent and/or employee of Arleo, who principally nonperformed the act through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as

consideration described in "58" above. The District Court seems to be holding onto the IFP application to avail itself of the USCA-3rd Cir. Internal Operating Procedure which requires mandatory appointment of counsel for those granted IFP status in the District Court on habeas; as an extremely inappropriate strategy to foist counsel upon COMPLAINANT so that he cannot argue his habeas petition in the 3rd Circuit. It is the height of bias for a district judge to so strategize against a party, and the act represents retaliation against COMPLAINANT for his exercise of his 1st Amendment right to petition the government for redress of his 6th amendment right to self-represent.

82.) On 5/25/23, COMPLAINANT sent a letter to Judge Michael E. Farbiarz, USDJ; who COMPLAINANT mistakenly referred to as "Michael D. Farbiarz"; via USPS Certified Mail, Return Receipt Requested. The tracking number for the certified mail, 70201810000155832890, on USPS.com shows that this piece of mail was delivered on 6/5/23. Yet to this day, because a DNJ Official obstructed the mail as defined by 18 U.S.C. 1700 et seq., the return receipt was never sent back to COMPLAINANT. That DNJ official performed that act acting as an agent and/or employee of Arleo, who principally performed the act through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above.

83.) On 6/7/23; COMPLAINANT sent COMPLAINANT's reply to the Respondent's opposition to COMPLAINANT's motion for summary judgment in the habeas case; to the USDC-DNJ and also to Judge Farbiarz; both via USPS Certified Mail, Return Receipt Requested. The tracking numbers show from USPS.com: that 70201810000155832753 was delivered to the DNJ on 6/14/23; and that 70201810000155832883 was delivered to Judge Farbiarz on 6/14/23. Yet to this day, because a DNJ Official obstructed the mail as defined by 18 U.S.C. 1700 et seq., the return receipt was never sent back to COMPLAINANT. That DNJ official performed that act acting as an agent and/or employee of Arleo, who principally performed the act through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through

said agency by Arleo for the benefit as consideration described in "58" above.

84.) COMPLAINANT received a return receipt in the due course of mail from COMPLAINANT's parcel to the DNJ described in "83" above as article number 70201810000155832753. The tracking number for the certified mail associated with this return receipt, on USPS.com shows that it was delivered to the Clerk of the Court on 6/14/23. However, a DNJ official wrote the false delivery date "6/15/23" on the return receipt, knowing the falsity of that misrepresentation at the time it was made, and sent it to COMPLAINANT through the mails, intending for COMPLAINANT to rely upon it. That DNJ official performed that act acting as an agent and/or employee of Arleo, who principally performed the act of 18 USC 1343 through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above.

85.) On 6/21/23, COMPLAINANT sent a service copy of COMPLAINANT's petition for Mandamus, Appeal No. 23-2188 (USCA-3rd Cir.) to Judge Michael E. Farbiarz, USDJ via USPS Certified Mail, Return Receipt Requested. The tracking number for the certified mail, 70201810000155832876, on USPS.com shows that this piece of mail was delivered on 6/30/23. Yet to this day, because a DNJ Official obstructed the mail as defined by 18 U.S.C. 1700 et seq., the return receipt was never sent back to COMPLAINANT. That DNJ official performed that act acting as an agent and/or employee of Arleo, who principally performed the act through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above.

86.) On 6/23/23, COMPLAINANT sent COMPLAINANT's application to proceed IFP in the mandamus proceeding described in "85" to Judge Michael E. Farbiarz, USDJ via USPS Certified Mail, Return Receipt Requested. The tracking number for the certified mail, 70201810000155832715, on USPS.com shows that this piece of mail was delivered on 7/5/23. Yet to this day, because a DNJ Official obstructed the mail as defined by 18 U.S.C. 1700 et seq., the return receipt was

never sent back to COMPLAINANT. That DNJ official performed that act acting as an agent and/or employee of Arleo, who principally performed the act through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above.

87.) On 7/31/23, COMPLAINANT sent COMPLAINANT's supplemental declaration in support of COMPLAINANT's petition for mandamus at Appeal No. 23-2188 to Judge Farbiarz via USPS certified mail. The tracking number for the certified mail 70201810000155833217, on USPS.com shows, to this day, that the piece of mail is "moving through network" and at a USPS processing facility, because a DNJ official intercepted the mail thereat and obstructed the mail as defined by 18 U.S.C. 1700 et seq. That DNJ official performed that act acting as an agent and/or employee of Arleo, who principally performed the act through her agent pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above. Notwithstanding this, the document was entered onto the docket on 8/10/23; and COMPLAINANT received a return receipt from this piece of mail in the due course of mail, which claims that it was delivered on 8/10/23.

88.) The pattern of facts in "62"-"87" above show that one or more DNJ officials have a custom or policy of colluding with one or more USPS officials to intercept mail at USPS processing facilities; and thereafter to tamper with and obstruct the mails, by interference with the certified mail and return receipt procedures for tracking of parcels. Numerous DNJ Official have availed themselves of this custom or policy with the wilful, knowing intention of obstructing COMPLAINANT's habeas proceeding and related civil proceeding. Those DNJ officials performed those acts as agents and/or employees of Arleo, who principally performed the acts through her agents pursuant to the BRS Conspiracy pleaded in "58"-"62"; as an act in furtherance of the BRS enterprise pleaded in "41"-"65"; which act was performed through said agency by Arleo for the benefit as consideration described in "58" above.

89.) On or about July 28, 2022, for the benefit of the nomination described in "58" above offered as consideration therefor, Arleo performed the act in her office as the senior district judge of the USDC-DNJ Newark Vicinage, of deliberately refusing to dispose of the cross-claims of James Galfy in the action "McGillvary v Galfy et al" Dkt. No. 2:21-17121-cv-MCA-CLW; with the intention of retaliating against COMPLAINANT for his exercise of his 1st Amendment Right to Petition the government for redress and also to obstruct his Due Process Rights under the 5th and 14th Amendments in discovery of the financial records he sought to discover with that action; knowing and intending that COMPLAINANT would incur the cost of the appeal at "McGillvary v Galfy et al" USCA-3rd Cir. App. No. 23-2188 without obtaining any relief which result was but for Arleo's such act for the benefit as consideration described in "58". Arleo engaged in this conduct of violating N.J.S.A. 2C:27-2,-10,-11 in furtherance of the BRS Enterprise and as a coconspirator of the BRS Conspiracy acting as an agent thereof; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS Enterprise pleaded in "44" in violation of 18 U.S.C. 1962.

90.) On March 31, 2023, COMPLAINANT filed a motion under Rule 27(b) to perpetuate the testimony of James Galfy in the action "McGillvary v Galfy et al" Dkt. No. 2:21-17121-cv-MCA-CLW under Rule 27(b). During the period from March 31, 2023 until October 10, 2023, Arleo and Waldor acted in concert with each other to delay the disposition of the motion with the intention of retaliating against COMPLAINANT for his exercise of his 1st Amendment Right to Petition the government for redress and also to obstruct his Due Process Rights under the 5th and 14th Amendments in discovery of the financial records he sought to discover with that action; knowing and intending that COMPLAINANT would incur the cost of the appeal of that decision and the cost of further proceedings on Petition under Rule 27(a) but for their intentional and calculated delay; and would be prejudiced in his due process rights by the delay of the requested deposition, which result was but for Waldor's such act for the benefit as consideration described in "59". Waldor and Arleo engaged in this conduct of violating N.J.S.A. 2C:27-2,-10,-11 in furtherance of the BRS Enterprise and as coconspirators of the BRS Conspiracy acting as agents thereof; which are predicate acts as part of a pattern of

racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS Enterprise pleaded in "44" in violation of 18 U.S.C. 1962.

91.) On or about October 10, 2023, for the benefit of the nomination described in "59" above offered as consideration therefor, Waldor performed the act in her office as magistrate judge of the USDC-DNJ Newark Vicinage, of refusing to allow the deposition to perpetuate the testimony of James Galfy in the action "McGillvary v Galfy et al" Dkt. No. 2:21-17121-cv-MCA-CLW; with the intention of retaliating against COMPLAINANT for his exercise of his 1st Amendment Right to Petition the government for redress and also to obstruct his Due Process Rights under the 5th and 14th Amendments in discovery of the financial records he sought to discover with that action; knowing and intending that COMPLAINANT would incur the cost of the appeal of that decision and would be prejudiced in his due process rights by the delay of the requested deposition, which result was but for Waldor's such act for the benefit as consideration described in "59". Waldor engaged in this conduct of violating N.J.S.A. 2C:27-2,-10,-11 in furtherance of the BRS Enterprise and as a coconspirator of the BRS Conspiracy acting as an agent thereof; which are predicate acts as part of a pattern of racketeering activity as defined by 18 U.S.C. 1961 in furtherance of the BRS Enterprise pleaded in "44" in violation of 18 U.S.C. 1962.

ROBERT MENENDEZ CORRUPTLY NOMINATING FEDERAL JUDGES

92.) On COMPLAINANT's information and belief, On a date and time which will be ascertained through discovery, Robert A Kirsch ("Kirsch") went to Chiang Mai Thailand with John Doe 4, a member of the bid rigging syndicate conspiracy; for the purpose of soliciting minors to engage in sexual acts. Whilst there, John Doe 4 created photographs of Kirsch engaged in sexual acts with a child, which CSAM was thereafter used as blackmail to coerce compliance from Kirsch in his decisions made from the bench. Kirsch alluded to this child sex trafficking in Chiang Mai, in a conversation with juror Joshua Gutkin on the record in a courtroom during voir dire on or about 4/2/19 by asking Gutkin if he had been to Chiang Mai, accompanied by Kirsch's lewd facial expressions, conspiratorial tone, and simulation of coitus with his fingers. John Doe 4 conferred with Nicholas Scutari and Kirsch on or about 12/22/09; which date will be ascertained with

certainty through discovery, and the 3 conferred, and had a meeting of the minds, and agreed with each other that Kirsch would accept the benefit of John Doe 4's forbearance from publishing the blackmail CSAM photographs of Kirsch engaged in sexual acts with a child to prosecuting authorities or Kirsch's family, in as consideration for Kirsch ratifying the acts of and joining the bid rigging syndicate conspiracy; and accepting appointment to the NJ State Bench; and thereafter using his judicial office to further the interests of the bid rigging syndicate enterprise by issuing rulings and performing actions that conform to the demands placed upon him by members of the bid rigging syndicate coconspirators. To this end, on or about December 23, 2009, Scutari did, for said benefit as consideration, use his office to persuade then-Governor Jon Corzine to nominate Kirsch to the NJ State bench, and thereafter used his office in the Senate Judiciary Committee to approve of Kirsch's appointment on 1/7/10 at 10AM; in violation of NJSA 2C:27-2, -10, -11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"-"65" in violation of 18 USC 1962.

93.) On COMPLAINANT's information and belief, At a date in 2016 to be determined through discovery, all members of the Bid rigging syndicate enterprise at that point associated-in-fact met with each other and agreed to confer with Robert A Kirsch to offer him the services of the Bid rigging syndicate enterprise in advising the NJ Governor to reappoint; and in the NJ Governor's case, causing the reappointment of: Kirsch as a Judge of the NJ Superior Court for a another 7 year term as benefit as consideration for Kirsch's accepting of COMPLAINANT's criminal case for the purpose of prosecuting COMPLAINANT from the bench, and making rulings and decisions in the case with the purpose and knowing, wilful intention of discrediting COMPLAINANT and falsely convicting him. All members of the Bid rigging syndicate enterprise at that point associated-in-fact also offered Kirsch that, if he was successful in doing so, the Bid rigging syndicate enterprise would also provide the benefit of their services in causing U.S. Senator Robert Menendez, who was an unregistered foreign agent, to advise any President of the United States currently in office at the time, to appoint Kirsch as a District Judge in the District of New Jersey whenever there was a vacancy for that office. All members of the Bid rigging syndicate enterprise at that point associated-in-fact did, in fact, so confer with

Kirsch; who accepted the offers knowing they were offered as benefit as consideration for his performance or nonperformance of actions, and thereby became associated in fact with the Bid rigging syndicate enterprise and a person acting as part of said enterprise. To this end, on or about November 7, 2016, Scutari did, for said benefit as consideration, use his office to persuade then-governor Chris Christie to nominate Kirsch to the NJ State bench and thereafter used his office in the Senate Judiciary Committee to approve of Kirsch's reappointment on 12/12/16 at 2pm; in violation of NJSA 2C:27-2,-10,-11; which are predicate acts as part of a pattern of racketeering activity as defined by 18 USC 1961 in furtherance of the BRS enterprise pleaded in "41"- "65" in violation of 18 USC 1962.


94.) On COMPLAINANT's information and belief, At a date in 2018 to be determined through discovery, all members of the Bid rigging syndicate enterprise at that point associated-in-fact met with each other and agreed to confer with Karen Cassidy to offer her the services of the Bid rigging syndicate enterprise in advising the NJ Governor to appoint; and in the NJ Governor's case, causing the appointment of Cassidy as a Judge of the NJ Superior Court for an additional 5 year term as benefit as consideration for Cassidy's re-assignment of COMPLAINANT's criminal case to Robert A Kirsch for the purpose of him prosecuting COMPLAINANT from the bench, and making rulings and decisions in the case with the purpose and knowing, wilful intention of discrediting COMPLAINANT and falsely convicting him. All members of the Bid rigging syndicate enterprise at that point associated-in-fact did, in fact, so confer with Cassidy; who accepted the offer knowing it was offered as benefit as consideration for her performance or nonperformance of actions, and thereby became associated in fact with the Bid rigging syndicate enterprise and a person acting as part of said enterprise.

On or about 3/26/18, COMPLAINANT's case in the NJ Superior Court was re-assigned by Karen Cassidy to Robert A Kirsch.

STATE OF New Jersey :
 :SS
 COUNTY Mercer :

IN WITNESS WHEREFORE, I, Caleb McGillvary, declare under penalty of perjury pursuant to 28 U.S.C. 1746 that the foregoing statements are true and accurate to the best of my belief and knowledge, and have hereunto set my hand and seals

this 6TH day of DECEMBER, 2023
 WITNESS:

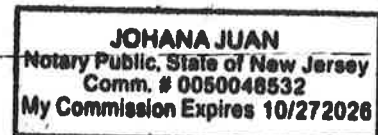
12/6/23 


 Caleb McGillvary

BE IT REMEMBERED that on this 6th day of December, 2023, personally appeared before me Caleb McGillvary, after being duly sworn, did depose and say that they executed the attached Complaint to the Federal Elections Commission pursuant to 52 U.S.C. 30109(a)(1), 11 C.F.R. 111.4(a) of their own free will and volition and understood its contents.


 NOTARY PUBLIC

My Commission Expires:



Caleb L. McGillvary, Pro Se
#1222665/SBI#102317G NJSP
PO Box 861 Trenton, NJ 08625

DECEMBER 6, 2023

Federal Elections Commission
1050 First Street NE
Washington, DC 20463

RE: Caleb L. McGillvary v. Robert Menendez et al.
Complaint No. _____

Dear Federal Elections Commission;

Please find enclosed and file the original of my complaint
of misconduct and violation of the Federal Elections Laws
pursuant to 52 U.S.C. 30109(a)(1), 11 C.F.R. 111.4(a).

Please stamp the enclosed copy "Filed" and send it back
to me in the enclosed self-addressed stamped envelope.

Kind Regards,



Caleb L. McGillvary
In Propria Persona

ENCL:
CC: FILE