

State of New Jersey
Department of Community Affairs
Division of Local Government Services - Local Finance Board
101 S Broad St – PO Box 803
Trenton, NJ 08625-0803
Phone – 609-292-6613
E-mail dlgs@dca.state.nj.us

February 18, 2009

PERSONAL & CONFIDENTIAL

Honorable Thomas Palmentieri, Committeeman
4208 Randy Court
Mays Landing, New Jersey 08330

Re: Local Government Ethics Law
Complaint #LFB-08-002
Notice of Dismissal

Dear Committeeman. Palmentieri:

The Local Government Ethics Law, N.J.S.A. 40A:9-22.1 et seq., [hereinafter, LGEL] provides the Local Finance Board [hereinafter, Board] with the power to initiate, receive, hear and review complaints, and hold hearings with regard to possible violations of the LGEL. Upon verification that no local ethics board has been established, the Board will determine if a complaint against a local government officer or employee is within its jurisdiction, frivolous, or has no reasonable factual basis. The Board will then determine if the complaint warrants a formal investigation.

In complaint #LFB-08-002, you alleged that Committee Members Amy Gatto and Roger Silva along with Deputy Mayor Nelson Gaskill violated the LGEL in the appointment of Hamilton Township Solicitor Randolph Lafferty. Specifically, you contend that Mr. Lafferty was active both as a contributor and supporter of the campaigns of the accused elected officials. According to your complaint, Mr. Lafferty's support, both financially and otherwise, "...invalidated the requirement of Pay to Play law for the process to be fair and open...."

Additionally, you alleged that the appointment was in violation of the terms of award, or "award criteria" established through the Township's "Fair and Open" award process.

Your complaint initially cited N.J.S.A. 40A:9-22.1 but failed to cite any specific provisions of the LGEL. In fact, what you have described in your complaint is a matter of compliance with the New Jersey Political Contribution Disclosure Compliance Law (a.k.a. "Pay to Play"). Please refer to N.J.S.A. 40A:19:44A-20.5 et seq. for additional information.

Editor's Note: In order to make these determination letters text searchable, I have scanned and converted them into "live-text" PDF documents. John Paff

Following a preliminary investigation of the facts and circumstances relevant to this complaint, and due to the fact that the Election Law Enforcement Commission and the Local Government Unit maintain jurisdiction over matters pertaining to Pay to Play, the

Board found no basis on which to authorize a formal investigation. Accordingly, the Board elected to dismiss the complaint against the above referenced officials and solicitor as having no reasonable factual basis.

This case is now closed.

If you have any questions regarding this matter, please feel free to contact David Zipin at (609) 292-0479.

Sincerely,

Susan Jacobucci, Chair
Local Finance Board

SJ:DZ

State of New Jersey
Department of Community Affairs
Division of Local Government Services - Local Finance Board
101 S Broad St – PO Box 803
Trenton, NJ 08625-0803
Phone – 609-292-6613
E-mail dlgs@dca.state.nj.us

February 18, 2009

PERSONAL & CONFIDENTIAL

Honorable Roger J. Silva
Committeeman, Hamilton Township
523 North Street
Mays Landing, New Jersey 08330

Re: Local Government Ethics Law
Complaint #LFB-08-002
Notice of Dismissal

Dear Committeeman Silva:

The Local Government Ethics Law, N.J.S.A. 40A:9-22.1 et seq., [hereinafter, LGEL] provides the Local Finance Board [hereinafter, Board] with the power to initiate, receive, hear and review complaints, and hold hearings with regard to possible violations of the LGEL. Upon verification that no local ethics board has been established, the Board will determine if a complaint against a local government officer or employee is within its jurisdiction, frivolous, or has no reasonable factual basis. The Board will then determine if the complaint warrants a formal investigation.

Complaint #LFB-08-002, alleged that you violated the LGEL in your participation in the appointment of Hamilton Township Solicitor. Specifically, the allegation stated that Solicitor Lafferty was active both as a contributor and supporter of your campaign. According to the complaint, Mr. Lafferty's support, both financially and otherwise, "...invalidated the requirement of Pay to Play law for the process to be fair and open...." Additionally, it is alleged that the appointment was in violation of the terms of award, or "award criteria" established through the Township's "Fair and Open" award process.

The complaint initially cited N.J.S.A. 40A:9-22.1 but failed to cite any specific provisions of the LGEL. In fact, what is described in the complaint is a matter of compliance with the New Jersey Political Contribution Disclosure Compliance Law (a.k.a. "Pay to Play"). Please refer to N.J.S.A. 40A:19:44A-20.5 et seq. for additional information.

Following a preliminary investigation of the facts and circumstances relevant to this complaint, and due to the fact that the Election Law Enforcement Commission and the

Editor's Note: In order to make these determination letters text searchable, I have scanned and converted them into "live-text" PDF documents. John Paff

Local Government Unit maintain jurisdiction over matters pertaining to Pay to Play, the Board found no basis on which to authorize a formal investigation. Accordingly, the Board elected to dismiss the complaint against you as having no reasonable factual basis.

Pursuant to N.J.S.A. 40A:9-22.9, the local government officer or employee against whom the complaint was filed must be notified of the Board's conclusion regarding the complaint. No action is required on your part. This letter is a notification that the above mentioned complaint was filed against you and subsequently dismissed.

This case is now closed.

If you have any questions regarding this matter, please feel free to contact David Zipin at (609) 292-0479.

Sincerely,

Susan Jacobucci, Chair
Local Finance Board

SJ:DZ

State of New Jersey
Department of Community Affairs
Division of Local Government Services - Local Finance Board
101 S Broad St – PO Box 803
Trenton, NJ 08625-0803
Phone – 609-292-6613
E-mail dlgs@dca.state.nj.us

February 18, 2009

PERSONAL & CONFIDENTIAL

Honorable Amy Gatto
Committeewoman, Hamilton Township
6204 Sears Avenue
Mays Landing, New Jersey 08330

Re: Local Government Ethics Law
Complaint #LFB-08-002
Notice of Dismissal

Dear Committeewoman Gatto:

The Local Government Ethics Law, N.J.S.A. 40A:9-22.1 et seq., [hereinafter, LGEL] provides the Local Finance Board [hereinafter, Board] with the power to initiate, receive, hear and review complaints, and hold hearings with regard to possible violations of the LGEL. Upon verification that no local ethics board has been established, the Board will determine if a complaint against a local government officer or employee is within its jurisdiction, frivolous, or has no reasonable factual basis. The Board will then determine if the complaint warrants a formal investigation.

Complaint #LFB-08-002, alleged that you violated the LGEL in your participation in the appointment of Hamilton Township Solicitor. Specifically, the allegation stated that Solicitor Lafferty was active both as a contributor and supporter of your campaign. According to the complaint, Mr. Lafferty's support, both financially and otherwise, "...invalidated the requirement of Pay to Play law for the process to be fair and open...."

Additionally, it is alleged that the appointment was in violation of the terms of award, or "award criteria" established through the Township's "Fair and Open" award process.

The complaint initially cited N.J.S.A. 40A:9-22.1 but failed to cite any specific provisions of the LGEL. In fact, what is described in the complaint is a matter of compliance with the New Jersey Political Contribution Disclosure Compliance Law (a.k.a. "Pay to Play"). Please refer to N.J.S.A. 40A:19:44A-20.5 et seq. for additional information.

Editor's Note: In order to make these determination letters text searchable, I have scanned and converted them into "live-text" PDF documents. John Paff

Following a preliminary investigation of the facts and circumstances relevant to this complaint, and due to the fact that the Election Law Enforcement Commission and the Local Government Unit maintain jurisdiction over matters pertaining to Pay to Play, the Board found no basis on which to authorize a formal investigation. Accordingly, the Board elected to dismiss the complaint against you as having no reasonable factual basis.

Pursuant to N.J.S.A. 40A:9-22.9, the local government officer or employee against whom the complaint was filed must be notified of the Board's conclusion regarding the complaint. No action is required on your part. This letter is a notification that the above mentioned complaint was filed against you and subsequently dismissed.

This case is now closed.

If you have any questions regarding this matter, please feel free to contact David Zipin at (609) 292-0479.

Sincerely,

Susan Jacobucci, Chair
Local Finance Board

SJ:DZ

State of New Jersey
Department of Community Affairs
Division of Local Government Services - Local Finance Board
101 S Broad St – PO Box 803
Trenton, NJ 08625-0803
Phone – 609-292-6613
E-mail dlgs@dca.state.nj.us

February 18, 2009

PERSONAL & CONFIDENTIAL

Honorable Nelson Gaskill
Committeeman, Hamilton Township
508 Farragut Avenue
Mays Landing, New Jersey 08330-2175

Re: Local Government Ethics Law
Complaint #LFB-08-002
Notice of Dismissal

Dear Committeeman Gaskill:

The Local Government Ethics Law, N.J.S.A. 40A:9-22.1 et seq., [hereinafter, LGEL] provides the Local Finance Board [hereinafter, Board] with the power to initiate, receive, hear and review complaints, and hold hearings with regard to possible violations of the LGEL. Upon verification that no local ethics board has been established, the Board will determine if a complaint against a local government officer or employee is within its jurisdiction, frivolous, or has no reasonable factual basis. The Board will then determine if the complaint warrants a formal investigation.

Complaint #LFB-08-002, alleged that you violated the LGEL in your participation in the appointment of Hamilton Township Solicitor. Specifically, the allegation stated that Solicitor Lafferty was active both as a contributor and supporter of your campaign. According to the complaint, Mr. Lafferty's support, both financially and otherwise, "...invalidated the requirement of Pay to Play law for the process to be fair and open...."

Additionally, it is alleged that the appointment was in violation of the terms of award, or "award criteria" established through the Township's "Fair and Open" award process.

The complaint initially cited N.J.S.A. 40A:9-22.1 but failed to cite any specific provisions of the LGEL. In fact, what is described in the complaint is a matter of compliance with the New Jersey Political Contribution Disclosure Compliance Law (a.k.a. "Pay to Play"). Please refer to N.J.S.A. 40A:19:44A-20.5 et seq. for additional information.

Editor's Note: In order to make these determination letters text searchable, I have scanned and converted them into "live-text" PDF documents. John Paff

Following a preliminary investigation of the facts and circumstances relevant to this complaint, and due to the fact that the Election Law Enforcement Commission and the Local Government Unit maintain jurisdiction over matters pertaining to Pay to Play, the

Board found no basis on which to authorize a formal investigation. Accordingly, the Board elected to dismiss the complaint against you as having no reasonable factual basis.

Pursuant to N.J.S.A. 40A:9-22.9, the local government officer or employee against whom the complaint was filed must be notified of the Board's conclusion regarding the complaint. No action is required on your part. This letter is a notification that the above mentioned complaint was filed against you and subsequently dismissed.

This case is now closed.

If you have any questions regarding this matter, please feel free to contact David Zipin at (609) 292-0479.

Sincerely,

Susan Jacobucci, Chair
Local Finance Board

SJ:DZ

State of New Jersey
Department of Community Affairs
Division of Local Government Services - Local Finance Board
101 S Broad St – PO Box 803
Trenton, NJ 08625-0803
Phone – 609-292-6613
E-mail dlgs@dca.state.nj.us

February 18, 2009

PERSONAL & CONFIDENTIAL

Mr. Randolph Lafferty, Esq.
Solicitor, Hamilton Township
155 Loeffel Court
Mays Landing, New Jersey 08330

Re: Local Government Ethics Law
Complaint #LFB-08-002
Notice of Dismissal

Dear Mr. Lafferty:

The Local Government Ethics Law, N.J.S.A. 40A:9-22.1 et seq., [hereinafter, LGEL] provides the Local Finance Board [hereinafter, Board] with the power to initiate, receive, hear and review complaints, and hold hearings with regard to possible violations of the LGEL. Upon verification that no local ethics board has been established, the Board will determine if a complaint against a local government officer or employee is within its jurisdiction, frivolous, or has no reasonable factual basis. The Board will then determine if the complaint warrants a formal investigation.

Complaint #LFB-08-002, alleged that you violated the LGEL in your acceptance the appointment of Hamilton Township Solicitor. Specifically, the allegation stated that you were active both as a contributor and supporter of campaigns for various officials who participated in your appointment. According to the complaint, your support, both financially and otherwise, "...invalidated the requirement of Pay to Play law for the process to be fair and open...."

Additionally, it is alleged that the appointment was in violation of the terms of award, or "award criteria" established through the Township's "Fair and Open" award process.

The complaint initially cited N.J.S.A. 40A:9-22.1 but failed to cite any specific provisions of the LGEL. In fact, what is described in the complaint is a matter of compliance with the New Jersey Political Contribution Disclosure Compliance Law (a.k.a. "Pay to Play"). Please refer to N.J.S.A. 40A:19:44A-20.5 et seq. for additional information.

Editor's Note: In order to make these determination letters text searchable, I have scanned and converted them into "live-text" PDF documents. John Paff

Following a preliminary investigation of the facts and circumstances relevant to this complaint, and due to the fact that the Election Law Enforcement Commission and the Local Government Unit maintain jurisdiction over matters pertaining to Pay to Play, the Board found no basis on which to authorize a formal investigation. Accordingly, the Board elected to dismiss the complaint against you as having no reasonable factual basis.

Pursuant to N.J.S.A. 40A:9-22.9, the local government officer or employee against whom the complaint was filed must be notified of the Board's conclusion regarding the complaint. No action is required on your part. This letter is a notification that the above mentioned complaint was filed against you and subsequently dismissed.

This case is now closed.

If you have any questions regarding this matter, please feel free to contact David Zipin at (609) 292-0479.

Sincerely,

Susan Jacobucci, Chair
Local Finance Board

SJ:DZ