

RICHARD J. PERR, ESQUIRE
41 South Haddon Avenue, Suite 5
Haddonfield, NJ 08033
856-795-1118
856-795-1110 (fax)

May 3, 2007

VIA FACSIMILE (609-943-3557) and REGULAR MAIL

Joint Legislative Committee on Ethical Standards
c/o Albert Porroni, Legislative Counsel
Office of Legislative Services
P.O. Box 068
Trenton, NJ 08625-0068

Dear Mr. Porroni:

Please accept this letter as a formal ethics complaint against Assemblyman Christopher J. Connors pursuant to the Conflicts of Interest Law (N.J.S.A. 52:13D-12 et seq.) and the Legislative Code of Ethics.

Pursuant to the Standard Operating Procedures of the Joint Legislative Committee on Ethical Standards, in order for an ethics complaint to be valid it must be commenced "within two years next after the conduct complained of occurred or *within two years after it is discovered by the complainant with the exercise of reasonable diligence*" (emphasis added.) Although the conduct alleged here occurred more than two years ago, it is nevertheless appropriate in this case for the Committee to review this complaint, as current events on Legislative conflicts gave me cause to review the relevant files and the information contained herein only recently came to light.

Based on financial disclosure forms, Assemblyman Connors' wife is employed by Ocean County, and his child by Lacey Township. Additional information also shows that Assemblyman Connors has, through his employment with the firm of Dasti, Murphy, McGuckin in Forked River, derived income from Little Egg Harbor Township as their municipal attorney. At least thirteen special budget grants, three of which were in the FY2000 Act, four of which were in the FY2001 Act, and six of which were in the FY2002 Act, were directed to the aforementioned communities from which Assemblyman Connors and/or his immediate family derived income.

Specifically, the grants that the Assemblyman may have advocated for are as follows:

FY2000

\$45,000 – Ocean County Community College Camp Viking

\$40,000 – Lacey Township – Gille Park Baseball Field

\$100,000 – Little Egg Harbor Municipal Justice Complex Center

FY2001

\$50,000 – Ocean County College Camp Viking

\$90,000 – Lacey Township Recreation Improvements

\$75,000 – Lacey Township – Gille Park Pavilion

\$300,000 – Transportation Trust Fund (TTF) Language – Engineering and Design of Fischer Blvd. Extension

FY2002

\$50,000 – Ocean County College Camp Viking

\$30,000 – Ocean County College – NJ Coastal Communiversit

\$300,000 – Transportation Trust Fund (TTF) Language – Engineering and Design of Fischer Blvd. Extension

\$75,000 – Lacey Township Dredging Project

\$55,000 – Ocean County Police Academy Police Memorial

\$170,000 – Environmental Learning Center of Ocean County

Pursuant to the Conflicts of Interest Law, at N.J.S.A. 52:13D-18, “[n]o member of the Legislature shall participate by voting or any other action on the floor of the General Assembly or the Senate, or in committee or elsewhere, in the enactment or defeat of legislation in which he has a personal interest” unless it can be shown that “no benefit or detriment could reasonably be expected to accrue to him, or a member of his immediate family, as a member of a business, profession, occupation or group, to any greater extent than any such benefit or detriment could reasonably be expected to accrue to any other member of such business, profession, occupation or group.”

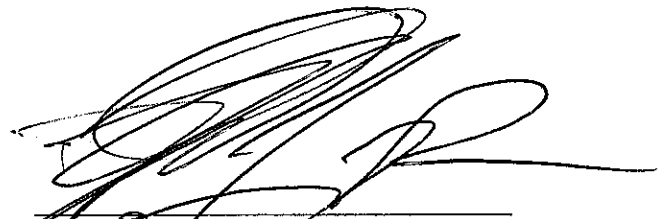
Section 2:1 of the Legislative Code of Ethics further provides that “[n]o member of the Legislature shall...act in any way that impairs the objectivity or independence of judgment of the member of the Legislature in the exercise of his or her duties...or which creates a justifiable impression among the public that such trust is being violated.”

Based on the information provided above, I respectfully request that the Joint Legislative Committee on Ethical Standards take jurisdiction of this matter to investigate whether Assemblyman Connors did advocate for and obtain these grants and therefore violated the New Jersey Conflict of Interest Law and the Code of Ethics.

Very truly yours,



Elia Pelios


Richard J. Perr

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Joint Legislative Committee on Ethical Standards
c/o Albert Porroni, Legislative Counsel
Office of Legislative Services
P.O. Box 068
Trenton, NJ 08625-0068

Dear Mr. Porroni:

Please accept this letter as a formal ethics complaint against Assemblyman David Wolfe pursuant to the Conflicts of Interest Law (N.J.S.A. 52:13D-12 et seq.) and the Legislative Code of Ethics.

Pursuant to the Standard Operating Procedures of the Joint Legislative Committee on Ethical Standards, in order for an ethics complaint to be valid it must be commenced "within two years next after the conduct complained of occurred or *within two years after it is discovered by the complainant with the exercise of reasonable diligence*" (emphasis added.) Although the conduct alleged here occurred more than two years ago, it is nevertheless appropriate in this case for the Committee to review this complaint, as current events on Legislative conflicts gave me cause to review the relevant files and the information contained herein only recently came to light.

Specifically, an article in the April 30, 2007 *Bergen Record*, detailing United States Attorney Chris Christie's probe into so-called "Christmas tree" grants doled out in the annual State budget process, highlighted two instances in which special funding was appropriated to entities closely tied to certain legislators who are not, as yet, subject to the federal probe. It is on the basis of the facts recited in that article that I have investigated the matter further and am filing this complaint.

Based on financial disclosure forms, Assemblyman Wolfe is employed by Ocean County College, and his wife has been employed by the organization Homes Now, Inc. At least five special budget grants, two of which were in the FY2000 Act, one of which was in the FY2001 Act, and two of which were in the FY2002 Act, were directed to the aforementioned communities or entities from which Assemblyman Wolfe and/or his immediate family derived income.

Specifically, the grants that the Assemblyman may have advocated for are as follows:

FY2000

\$500,000 – Homes Now, Inc. – Brick Township Project

\$45,000 – Ocean County Community College – Camp Viking

FY2001

\$50,000 – Ocean County College – Camp Viking

FY2002

\$50,000 – Ocean County College – Camp Viking

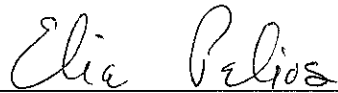
\$30,000 – Ocean County College – New Jersey Coastal Communiversitiy

The Conflicts of Interest Law, at N.J.S.A. 52:13D-18, states that “[n]o member of the Legislature shall participate by voting or any other action on the floor of the General Assembly or the Senate, or in committee or elsewhere, in the enactment or defeat of legislation in which he has a personal interest” unless it can be shown that “no benefit or detriment could reasonably be expected to accrue to him, or a member of his immediate family, as a member of a business, profession, occupation or group, to any greater extent than any such benefit or detriment could reasonably be expected to accrue to any other member of such business, profession, occupation or group.”

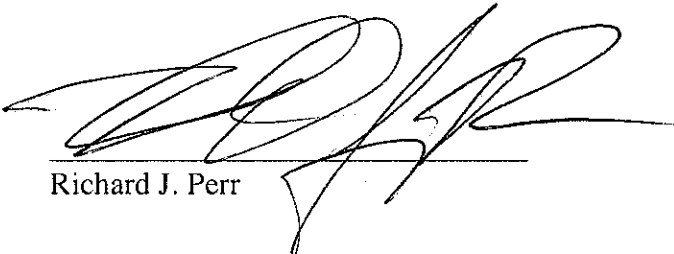
Section 2:1 of the Legislative Code of Ethics further provides that “[n]o member of the Legislature shall...act in any way that impairs the objectivity or independence of judgment of the member of the Legislature in the exercise of his or her duties...or which creates a justifiable impression among the public that such trust is being violated.”

Based on the information provided above, I respectfully request that the Joint Legislative Committee on Ethical Standards take jurisdiction of this matter to investigate whether Assemblyman Wolfe did advocate for and obtain these grants, and therefore violated the New Jersey Conflict of Interest Law and the Code of Ethics when he sought and obtained these grants.

Very truly yours,



Elia Pelios



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Joint Legislative Committee on Ethical Standards
c/o Albert Porroni, Legislative Counsel
Office of Legislative Services
P.O. Box 068
Trenton, NJ 08625-0068

Dear Mr. Porroni:

Please accept this letter as a formal ethics complaint against Senator Robert Singer pursuant to the Conflicts of Interest Law (N.J.S.A. 52:13D-12 et seq.) and the Legislative Code of Ethics.

Pursuant to the Standard Operating Procedures of the Joint Legislative Committee on Ethical Standards, in order for an ethics complaint to be valid it must be commenced "within two years next after the conduct complained of occurred or *within two years after it is discovered by the complainant with the exercise of reasonable diligence*" (emphasis added.) Although the conduct alleged here occurred more than two years ago, it is nevertheless appropriate in this case for the Committee to review this complaint, as current events on Legislative conflicts gave me cause to review the relevant files and the information contained herein only recently came to light.

Specifically, an article in the April 30, 2007 *Bergen Record*, detailing United States Attorney Chris Christie's probe into so-called "Christmas tree" grants doled out in the annual State budget process, highlighted two instances in which special funding was appropriated to entities closely tied to certain legislators who are not, as yet, subject to the federal probe. It is on the basis of the facts recited in that article that I have investigated the matter further and am filing this complaint.

Based on financial disclosure forms, Senator Singer has been employed by Lakewood Township and Community/Kimball Medical Center. In addition, in 2005 Senator Singer was also the recipient of an honoraria from Kimball Medical Center. At least ten special budget grants, five of which were in the FY2000 Act, four of which were in the FY2001 Act, and one of which was in the FY2002 Act, were directed to the aforementioned communities or entities from which Senator Singer derived income.

Specifically, the grants that the Senator may have advocated for are as follows:

FY2000

\$40,000 -- Lakewood Volunteer Fire Company -- Defibrillators
\$100,000 -- Lakewood Township Recreational Fields Improvement
\$16,000 -- Lakewood First Aid -- Defibrillators
\$85,000 -- Kimball Medical Center's Assisted Living Facilities Bus Purchase
\$200,000 -- Kimball Medical Center's Neighborhood Health Center

FY2001

\$63,000 -- Lakewood First Aid & Emergency, Inc.
\$50,000 -- Lakewood Fire Commissioners, District No. 1
\$75,000 -- Lakewood Township Municipal Building Elevator Renovation and
Emergency Vehicle
\$250,000 -- Kimball Medical Center -- Emergency Room Expansion

FY2002

\$344,000 -- Kimball Medical Center Lakewood -- Emergency Services and
Equipment

The Conflicts of Interest Law, at N.J.S.A. 52:13D-18, states that "[n]o member of the Legislature shall participate by voting or any other action on the floor of the General Assembly or the Senate, or in committee or elsewhere, in the enactment or defeat of legislation in which he has a personal interest" unless it can be shown that "no benefit or detriment could reasonably be expected to accrue to him, or a member of his immediate family, as a member of a business, profession, occupation or group, to any greater extent than any such benefit or detriment could reasonably be expected to accrue to any other member of such business, profession, occupation or group."


Section 2:1 of the Legislative Code of Ethics further provides that "[n]o member of the Legislature shall...act in any way that impairs the objectivity or independence of judgment of the member of the Legislature in the exercise of his or her duties...or which creates a justifiable impression among the public that such trust is being violated."

Based on the information provided above, I respectfully request that the Joint Legislative Committee on Ethical Standards take jurisdiction of this matter to investigate whether Senator Singer did advocate for and obtain these grants and therefore violated the New Jersey Conflict of Interest Law and the Code of Ethics when he sought and obtained these grants.

Very truly yours,



Elia Pelios



Richard J. Ferr

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Joint Legislative Committee on Ethical Standards
c/o Albert Porroni, Legislative Counsel
Office of Legislative Services
P.O. Box 068
Trenton, NJ 08625-0068

Dear Mr. Porroni:

Please accept this letter as a formal ethics complaint against Assemblyman Kevin O'Toole pursuant to the Conflicts of Interest Law (N.J.S.A. 52:13D-12 et seq.) and the Legislative Code of Ethics.

Pursuant to the Standard Operating Procedures of the Joint Legislative Committee on Ethical Standards, in order for an ethics complaint to be valid it must be commenced "within two years next after the conduct complained of occurred or *within two years after it is discovered by the complainant with the exercise of reasonable diligence*" (emphasis added.) Although a portion of the conduct alleged here occurred more than two years ago, it is nevertheless appropriate in this case for the Committee to review this complaint, as current events on Legislative conflicts gave me cause to review the relevant files and the information contained herein only recently came to light.

Based on financial disclosure forms, Assemblyman O'Toole's wife is employed by Essex County. Several special budget grants in the FY2001 and FY2002 Acts were directed to Essex County, from which Assemblyman O'Toole's immediate family derives income.

Specifically, the grants that the Assemblyman may have advocated for are as follows:

FY2001

\$950,000 – Essex County – Hilltop Parkland Improvements/Maintenance

\$950,000 – Essex County – Parkland Improvements/Maintenance

FY2002

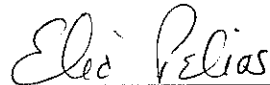
\$5,000,000 – Special Aid to Essex County

Pursuant to the Conflicts of Interest Law, at N.J.S.A. 52:13D-18, “[n]o member of the Legislature shall participate by voting or any other action on the floor of the General Assembly or the Senate, or in committee or elsewhere, in the enactment or defeat of legislation in which he has a personal interest” unless it can be shown that “no benefit or detriment could reasonably be expected to accrue to him, or a member of his immediate family, as a member of a business, profession, occupation or group, to any greater extent than any such benefit or detriment could reasonably be expected to accrue to any other member of such business, profession, occupation or group.”

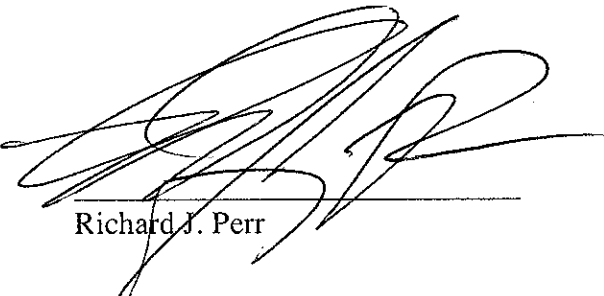
Section 2:1 of the Legislative Code of Ethics further provides that “[n]o member of the Legislature shall...act in any way that impairs the objectivity or independence of judgment of the member of the Legislature in the exercise of his or her duties...or which creates a justifiable impression among the public that such trust is being violated.”

Based on the information provided above, I respectfully request that the Joint Legislative Committee on Ethical Standards take jurisdiction of this matter to investigate whether Assemblyman O’Toole did advocate for and obtain the grants which were directed to the county, and therefore violated the New Jersey Conflict of Interest Law and the Code of Ethics.

Very truly yours,



Elia Pelios



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Joint Legislative Committee on Ethical Standards
c/o Albert Porroni, Legislative Counsel
Office of Legislative Services
P.O. Box 068
Trenton, NJ 08625-0068

Dear Mr. Porroni:

Please accept this letter as a formal ethics complaint against Senator Joseph Kyrillos pursuant to the Conflicts of Interest Law (N.J.S.A. 52:13D-12 et seq.) and the Legislative Code of Ethics.

Pursuant to the Standard Operating Procedures of the Joint Legislative Committee on Ethical Standards, in order for an ethics complaint to be valid it must be commenced "within two years next after the conduct complained of occurred or *within two years after it is discovered by the complainant with the exercise of reasonable diligence*" (emphasis added.) Although some of the conduct alleged here occurred more than two years ago, it is nevertheless appropriate in this case for the Committee to review this complaint, as current events on Legislative conflicts gave me cause to review the relevant files and the information contained herein only recently came to light.

Based on financial disclosure forms, Senator Kyrillos' wife is employed by Monmouth University. Additionally, Senator Kyrillos serves on the boards of Bayshore Senior Day Center, Count Basie Theater, Newark Do Something, the New Jersey Historical Society, Prevention First of Oakhurst, NJ, and the Monmouth County Historical Association, and his wife is on the board of Monmouth Medical Center.

At least eighteen special budget grants, six of which were in the FY2000 Act, seven of which were in the FY2001 Act, four of which were in the FY2002 Act, and one of which was in the FY2005 Act, were directed to the entities from which Senator Kyrillos and/or his immediate family derived income, or served in a trusteeship capacity.

Specifically, the grants that the Senator may have advocated for are as follows:

FY2000

\$5,000 – Monmouth University – Program for Acceleration in Computer Science for Minority Students
\$1,200,000 – New Jersey Historical Society relocation
\$100,000 – Family Health Center at Monmouth Medical Center, Long Branch
\$50,000 – Bayshore Senior Center
\$100,000 – Monmouth County Historical Association, Taylor-Butler House Capital Improvement
\$100,000 – Monmouth Medical Center -- AWARE

FY2001

\$50,000 – Bayshore Senior Center
\$100,000 – Monmouth County Historical Association, Taylor-Butler House Capital Improvement
\$100,000 – Newark Do Something
\$110,000 – Count Basie Theater
\$100,000 – Monmouth Medical Center -- AWARE
\$5,000 – Monmouth University – Program for Acceleration in Computer Science Careers
\$3,500,000 – Monmouth University Multi-purpose Regional Activity Center

FY2002

\$100,000 – Monmouth Medical Center -- AWARE
\$100,000 – Newark Do Something
\$1,500,000 – Monmouth University Multi-purpose Regional Activity Center
\$20,000 – Prevention First Monmouth County

FY2005

\$90,000 – Monmouth University Nursing Camp Grant

Pursuant to the Conflicts of Interest Law, at N.J.S.A. 52:13D-18, “[n]o member of the Legislature shall participate by voting or any other action on the floor of the General Assembly or the Senate, or in committee or elsewhere, in the enactment or defeat of legislation in which he has a personal interest” unless it can be shown that “no benefit or detriment could reasonably be expected to accrue to him, or a member of his immediate family, as a member of a business, profession, occupation or group, to any greater extent than any such benefit or detriment could reasonably be expected to accrue to any other member of such business, profession, occupation or group.”

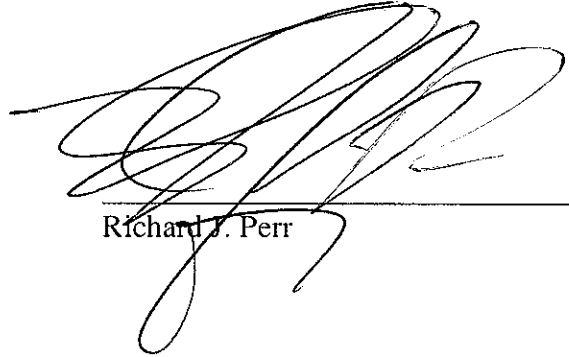
Section 2:1 of the Legislative Code of Ethics further provides that “[n]o member of the Legislature shall...act in any way that impairs the objectivity or independence of judgment of the member of the Legislature in the exercise of his or her duties...or which creates a justifiable impression among the public that such trust is being violated.”

Based on the information provided above, I respectfully request that the Joint Legislative Committee on Ethical Standards take jurisdiction of this matter to investigate whether Senator Kyrillos did advocate for and obtain these grants, and therefore violated the New Jersey Conflict of Interest Law and the Code of Ethics.

Very truly yours,



Elia Pelios



Richard J. Perr

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Joint Legislative Committee on Ethical Standards
c/o Albert Porroni, Legislative Counsel
Office of Legislative Services
P.O. Box 068
Trenton, NJ 08625-0068

Dear Mr. Porroni:

Please accept this letter as a formal ethics complaint against Assemblyman Richard A. Merkt pursuant to the Conflicts of Interest Law (N.J.S.A. 52:13D-12 et seq.) and the Legislative Code of Ethics.

Pursuant to the Standard Operating Procedures of the Joint Legislative Committee on Ethical Standards, in order for an ethics complaint to be valid it must be commenced "within two years next after the conduct complained of occurred or *within two years after it is discovered by the complainant with the exercise of reasonable diligence*" (emphasis added.). Although the conduct alleged here occurred more than two years ago, it is nevertheless appropriate in this case for the Committee to review this complaint, as current events on Legislative conflicts gave me cause to review the relevant files and the information contained herein only recently came to light.

As indicated in financial disclosure statements, Assemblyman Merkt is employed by Fairleigh Dickinson University. In F2002, the Fairleigh Dickinson University Distance Learning Institute received a special grant of \$3,900,000 which the Assemblyman may have advocated for.

In addition, Assemblyman Merkt, while serving on the Board of the Morris Center YMCA, may also have advocated for and obtained special appropriations in FY2002 of \$100,000 for that entity's Child Care Facility. (This grant was ultimately reduced to \$50,000 by the Governor's line-item veto, but the Appropriations bill that was approved by the Legislature allocated the original amount of \$100,000.)

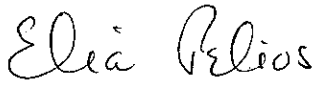
The New Jersey Conflicts of Interest Law, at N.J.S.A. 52:13D-18, provides in pertinent part:

"[n]o member of the Legislature shall participate by voting or any other action on the floor of the General Assembly or the Senate, or in committee or elsewhere, in the enactment or defeat of legislation in which he has a personal interest" unless it can be shown that "no benefit or detriment could reasonably be expected to accrue to him, or a member of his immediate family, as a member of a business, profession, occupation or group, to any greater extent than any such benefit or detriment could reasonably be expected to accrue to any other member of such business, profession, occupation or group."

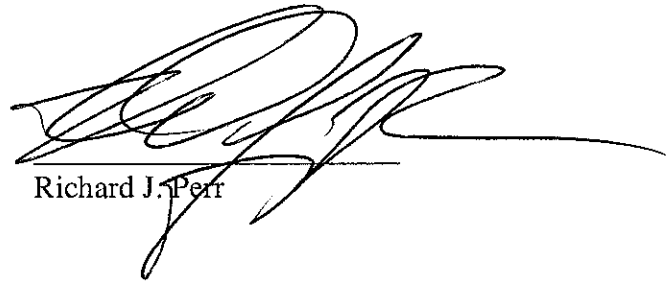
Section 2:1 of the Legislative Code of Ethics further provides that "[n]o member of the Legislature shall...act in any way that impairs the objectivity or independence of judgment of the member of the Legislature in the exercise of his or her duties...or which creates a justifiable impression among the public that such trust is being violated."

Based on the information above, I respectfully request that the Joint Legislative Committee on Ethical Standards take jurisdiction of this matter to investigate whether Assemblyman Merkt did advocate for and obtain these grants, and therefore violated the New Jersey Conflict of Interest Law and the Code of Ethics.

Very truly yours,



Elia Pelios
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Joint Legislative Committee on Ethical Standards
c/o Albert Porroni, Legislative Counsel
Office of Legislative Services
P.O. Box 068
Trenton, NJ 08625-0068

Dear Mr. Porroni:

Please accept this letter as a formal ethics complaint against Senator Peter Inverso pursuant to the Conflicts of Interest Law (N.J.S.A. 52:13D-12 et seq.) and the Legislative Code of Ethics.

Pursuant to the Standard Operating Procedures of the Joint Legislative Committee on Ethical Standards, in order for an ethics complaint to be valid it must be commenced "within two years next after the conduct complained of occurred or *within two years after it is discovered by the complainant with the exercise of reasonable diligence*" (emphasis added.) Although most of the conduct alleged here occurred more than two years ago, it is nevertheless appropriate in this case for the Committee to review this complaint, as current events on Legislative conflicts gave me cause to review the relevant files and the information contained herein only recently came to light.

Based on financial disclosure forms, Senator Inverso serves on the boards of Robert Wood Johnson University Hospital at Hamilton, Rider University, and Project Freedom in Washington Township. At least three special budget grants, one of which was in the FY2001 Act, and two of which were in the FY2002 Act, were directed to the entities from which Assemblyman Inverso served in a trusteeship capacity.

Additionally, as a June 25, 2000 *Philadelphia Inquirer* article reported, a \$20,000 grant was directed to a nonprofit organization called Mission Kindness International. Those funds "went largely to pay the salary" of Senator Inverso's cousin, Andrea Inverso, who headed the organization.

Specifically, the grants that the Senator may have advocated for are as follows:

FY2001
\$15,000 – Project Freedom

FY2002

\$25,000 – RWJ University Hospital at Hamilton – Grounds for Healing Project


\$500,000 – Rider University Sports and Recreational Facility

Pursuant to the Conflicts of Interest Law, at N.J.S.A. 52:13D-18, “[n]o member of the Legislature shall participate by voting or any other action on the floor of the General Assembly or the Senate, or in committee or elsewhere, in the enactment or defeat of legislation in which he has a personal interest” unless it can be shown that “no benefit or detriment could reasonably be expected to accrue to him, or a member of his immediate family, as a member of a business, profession, occupation or group, to any greater extent than any such benefit or detriment could reasonably be expected to accrue to any other member of such business, profession, occupation or group.”

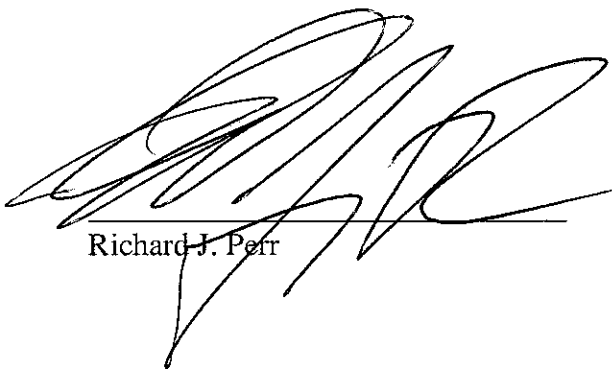
Section 2:1 of the Legislative Code of Ethics further provides that “[n]o member of the Legislature shall...act in any way that impairs the objectivity or independence of judgment of the member of the Legislature in the exercise of his or her duties...or which creates a justifiable impression among the public that such trust is being violated.”

Based on the information provided above, I respectfully request that the Joint Legislative Committee on Ethical Standards take jurisdiction of this matter to investigate whether Senator Inverso did advocate for and obtain these grants, and therefore violated the New Jersey Conflict of Interest Law and the Code of Ethics.

Very truly yours,



Elia Pelios



Richard J. Perr