



RAINONE
COUGHLIN
MINCHELLO
ATTORNEYS AT LAW

Louis N. Rainone
Craig J. Coughlin*
David L. Minchello
Carol A. Berlen
John F. Gillick
Brian P. Trelease*
Walter D. Denson
* Also admitted in New York

Anne E. Rowan
Conor J. Hennessey*
Ruben D. Perez*
Brian M. Riehl
Matthew R. Tavares*

Of Counsel
Baye Adofo-Wilson

Writer's Direct:
DMinchello@NJRCMLaw.co
m

June 4, 2019

Attorney General Gurbir Grewal
Office of the Attorney General
Hughes Justice Complex
P.O. Box 080
25 Market Street
Trenton, NJ 08625-0081

Re: June 4, 2019 Linden Democratic Primary / Violations of Election Law

This firm represents the Linden Democratic Committee regarding the above-captioned matter. Today, June 4, 2019, the City of Linden held its primary election. It has come to our attention that serious violations of both State and Federal election law have taken place during the course of this election. Specifically, an e-mail was disseminated on election day offering voters the opportunity to meet Samuel L. Jackson in exchange for casting their ballot for "Column C Democrats" also known as Democrats United for Progress. (See Attached E-mail). Additionally, the e-mail encouraged voters to take a photograph of their ballot inside the voting booth to gain admittance to the so-called "Column C Victory Party."

These egregious acts constitute a direct violation of both State and Federal law. For example, 18 U.S.C. 597 specifically precludes anyone from offering "to make an expenditure to any person, either to vote or withhold his vote, or to vote for or against any candidate." Likewise, N.J.S.A. 19:34-7 precludes anyone from taking a photo of their ballot or requesting that a voter show the contents of their ballot. Here, the e-mail at issue violates both these statutes.

This e-mail has the potential to taint the results of today's election. As the agency tasked with ensuring fair elections, we hereby request that you immediately investigate these matters. We further reserve the right to seek redress for these violations in any court of competent jurisdiction.

These violations warrant your immediate attention. Thank you for your consideration of this most pressing matter.

Respectfully Submitted,

RAINONE COUGHLIN MINCHELLO, LLC

By: 

David L. Minchello, Esq.

DLM/bmr

cc: Union County Prosecutor
U.S. Attorney's Office
Honorable Thomas K. Isenhour, J.S.C.

Enc.

Ruben Perez

From: David Minchello
Sent: Tuesday, June 4, 2019 5:08 PM
To: Ruben Perez
Subject: Fwd: Meet Samuel L. Jackson in Linden tonight!

RAINONE COUGHLIN MINCHELLO

David L. Minchello, Esq. | Partner
555 U.S. [One South, Suite 440](#)
[Iselin, New Jersey 08830](#)
Office (732) 709-4182
Fax: (732) 791-1555
Mobile: (908) 635-3599
Email: dminchello@njrcmlaw.com
Website: www.njrcmlaw.com

NOTICE: This message and any attachments contain information which may be confidential and privileged. Unless you are an intended recipient (or authorized to receive for an intended recipient), you may not review, use, copy, disclose, or transmit to anyone the message or any information contained in the message or any attachments. If you have received the message in error, please advise the sender by reply email and delete the message. Thank you very much.

Begin forwarded message:

From: Nicholas Fixmer <nick@paragonstrat.com>
Date: June 4, 2019 at 3:39:32 PM EDT
To: "'Tonyteixeira@gmail. com'" <Tonyteixeira@gmail.com>, Dave Minchello <dminchello@njrcmlaw.com>
Subject: Fwd: Meet Samuel L. Jackson in Linden tonight!

Begin forwarded message:

From: Kristin Ianco Yaeger <iancok33@gmail.com>
Date: June 4, 2019 at 3:37:52 PM EDT
To: Nicholas Fixmer <nick@paragonstrat.com>, Harris Laufer <harrislaufer@yahoo.com>
Subject: Fwd: Meet Samuel L. Jackson in Linden tonight!

----- Forwarded message -----

From: **Skyler Rachlin** <srachlin411@gmail.com>
Date: Tue, Jun 4, 2019 at 3:11 PM
Subject: Fwd: Meet Samuel L. Jackson in Linden tonight!
To: Kristin Ianco <iancok33@gmail.com>

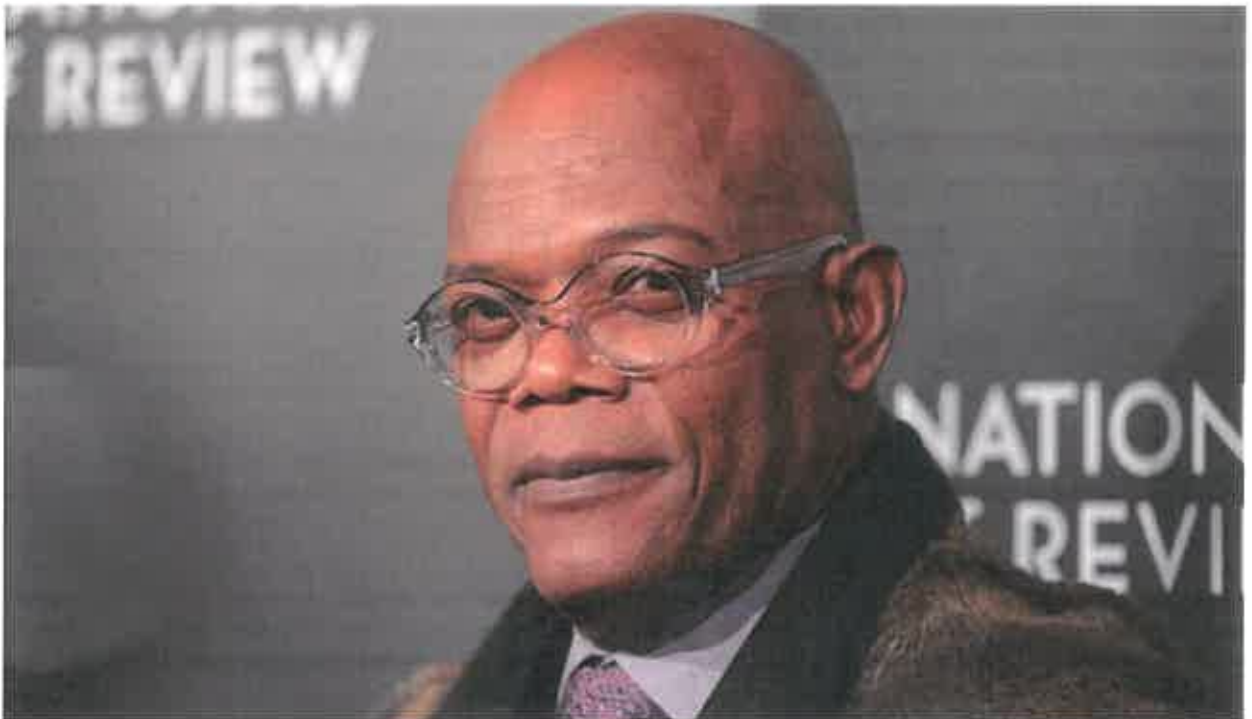
----- Forwarded message -----

From: **Bob Rachlin** <rrachlin@comcast.net>
Date: Tue, Jun 4, 2019 at 3:10 PM
Subject: Fwd: Meet Samuel L. Jackson in Linden tonight!
To: Skyler Rachlin <srachlin411@gmail.com>

Get [Outlook for Android](#)

----- Forwarded message -----

From: "**Frank Reynolds**" <frankfortreynolds.com@kenbalut.com>
Date: Tue, Jun 4, 2019 at 2:17 PM -0400
Subject: Meet Samuel L. Jackson in Linden tonight!
To: "Robert Rachlin" <rrachlin@comcast.net>



I am pleased to invite you to meet the famous actor **Samuel L. Jackson**, who will be appearing at the **Column C Victory Party**

hosted by Mayor Derek Armstead tonight in Linden. The party will be at Nuno's Pavilion on Roselle Street starting at 8:45 p.m. but to get in, you must show that you have voted.

The best way to do that is by using your cell phone to take a picture of your ballot with **all the Column C candidates** marked, once you are in the voting booth.

I look forward to seeing you!

[Unsubscribe](#)