



Maximilian J. Ranzato, Esq.
Associate
mranzato@pemplawfirm.com
Office: +1 973.577.5500
Direct: +1 917.750.8718

June 16, 2025

VIA ELECTRONIC MAIL

Nany Pinkin, County Clerk
County Administration Building, 4th Floor
75 Bayard Street
New Brunswick, New Jersey 08901

Cheryl Russomanno, Township Clerk
100 Municipal Boulevard
Edison, New Jersey 08817

Re: *In re : Challenge to Petition of David Tingle (Mayor)*

Dear Clerk Pinkin:

Kindly accept this letter on behalf of Tom Lankey (“Petitioner”), calling for the rejection of a petition for nomination filed by David Tingle (“Respondent”) in the 2025 Election for the Mayor of Edison, New Jersey.

It’s important to point out Respondent’s history during this election cycle. The circumstances surrounding Respondent’s candidacy are highly irregular and reflect a concerted effort to evade the statutory framework governing ballot access in New Jersey. Respondent initially pursued a partisan candidacy for a different office, and only after failing to meet the legal requirements to qualify for the Democratic primary ballot did he attempt to rebrand himself as an Independent candidate.

On January 13, 2025, Respondent filed a D-1 form with the New Jersey Election Law Enforcement Commission (ELEC), formally organizing a candidate committee and designating himself as a Democratic candidate. He thereafter actively raised campaign funds and solicited public support under the Democratic Party banner, including via his Venmo account, which reflects contributions beginning in February and continuing through March 2025.

On March 14, 2025, Respondent submitted a second D-1 form, again identifying himself as a Democratic candidate. He produced and distributed campaign materials clearly indicating his candidacy as a Democrat, and aligned himself publicly with Democratic figures, including Steve Fulop. His campaign literature, social media posts, and political signage all promoted him as a Democrat.

On March 20, 2025, Respondent signed and submitted his nominating petition for inclusion on the Democratic primary ballot. That petition included the mandatory Certificate of Acceptance, in which Respondent expressly declared, under penalty of law, that he was a “Democrat” and qualified to run as such.

Subsequently, Respondent’s Democratic petition was rejected for failing to include the minimum number of valid signatures as required by N.J.S.A. 19:23-8. Rather than accept this outcome, Respondent pivoted again and, on April 10, 2025, filed a new D-1 form with ELEC, this time declaring his intent to run as an Independent candidate in the general election.

Even after the rejection of his Democratic petition, Respondent continued to solicit write-in votes in the Democratic primary, and campaigned openly in support of his candidacy as a Democrat. These efforts further demonstrate that Respondent has not disavowed his prior partisan affiliation, and that his “Independent” petition is not a genuine expression of independent candidacy, but rather a reactive and impermissible attempt to bypass the statutory nomination process after his initial failure.

Pursuant to N.J.S.A. 19:23-7, all petition signers must reside within the district in which the candidate seeks election. Upon review of Respondent’s submitted petition, a substantial number of the signatures fail to meet these statutory requirements.

Specifically, the petition includes multiple signers who were not eligible to sign the petitions as they either: are not registered to vote; do not live in Edison, New Jersey; had previously signed petitions for other candidates to appear on the primary ballot; or signed petitions on or before the June 10th primary election day and then voted in the primary for a Democrat or Republican for a particular office.

Once these ineligible signatures are removed, the Respondent’s petition fails to meet the statutory threshold of valid signatures required under N.J.S.A. 19:23-8. As a result, he has not satisfied the legal requirements to appear on the general election ballot as a candidate for the office of Mayor of Edison, New Jersey.

The enclosed table outlines the initial list of petition objections. We welcome examination of the Respondent under oath and any referral to the appropriate authorities for review of their conduct. As set forth in N.J.S.A. 19:23-20.2, your office may uphold these objections and reject the petitions summarily for the reasons set forth above.

Petitioner expressly reserves his ability to supplement or add additional objections to those made herein as additional information becomes available.

Thank you for your consideration of this objection.

Respectfully,

PEM LAW LLP

s/ Maximilian Ranzato

MAXIMILIAN J. RANZATO, ESQ.

c: crussomanno@edisonnj.org
Rparikh@pemlawfirm.com

Initial List of Petition Objections
(subject to revision/addition)

#	Booklet	Line(s)	Signatures
1.	Book 2	Page 3, Lines 1	1
2.	Book 3	Page 3, Lines 1, 3, 4, 5, Page 4, Lines 11	5
3.	Book 4	Page 3, Lines 2, 3 Page 4, Lines 7	3
4.	Book 5	Page 3, Lines 2, 5 Page 4, Lines 7, 8, 9, 12, 13, 16, 17	9
5.	Book 6	Page 5, Lines 6, 7, Page 6, Lines 12, 13, 14, 15, 17 Page 7, Lines 7	8
6.	Book 7	Page 3, Lines 1, 3, 5 Page 4, Lines 6, 7, 8, 9, 13, 14	9
7.	Book 8	Page 3, Lines 1, 2, 3, 4, 5 Page 4, Lines 6, 7, 8, 9, 10, 11, 12, 13, 15, 16 Page 5, Lines 6, 8, 9, 10, 11, 12, 13, 15, 16, 17	25
8.	Book 9	Page 3, Lines 1, 3, 7, 8, 9, 10	6
9.	Book 10	Page 3, Lines 3, 5	2
10.	Book 11	Page 3, Lines 1, 3, 4 Page 4, Lines 6, 7, 9, 10, 15, 17	9
11.	Book 12	Page 3, Lines 2, 3, 4 Page 4, Lines 7, 8, 11, 15, 16	8
12.	Book 13	Page 3, Lines 1, 2, 3 Page 4, Lines 4, 8, 10	6
13.	Book 14	Page 3, Lines 1, 2 Page 4, Lines 1, 2, 8, 10, 12	7
14.	Book 15	Page 3, Lines 3, 5 Page 4, Lines 4, 5, 6, 11	6

15.	Book 16	Page 3 Lines 1, 3, 4	3
16.	Book 17	Page 4, Lines 4	1
17.	Book 18	Page 4, Lines 3, 5, 6, 7, 11	5
18.	Book 19	Page 4, Lines 7, 8, 11	3
19.	Book 20	Page 3, Lines 1, 3, 4, 5	4
20.	Book 21	Page 3, Lines 2 Page 4, Lines 4, 5, 7, 11, 12,	6
21.	Book 22	Page 3, Lines 1, 2, 3 Page 4, Lines 1, 2, 3 Page 6, Lines 2 Page 7, Lines 1, 3, 8, 9, 10	12
22.	Book 23	Page 3, Lines 1, 4, 5 Page 4, Lines 1, 2, 3, 4, 5	8