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March 27, 2025

VIA ELECTRONIC MAIL

Cheryl Russomanno, Township Clerk
100 Municipal Boulevard
Edison, New Jersey 08817
(crussomanno@edisonnj.org)

Re: *In re : Challenge to Petition of Patel, Patel, Mehta, Chen and DeAmorin*

Dear Clerk Russomanno:

Kindly accept this letter on behalf of Bimal Joshi (“Petitioner”), calling for the rejection of a petition for nominations filed by Lav Patel for Mayor, Anjana Patel for Mayor and council candidates Jayesh Mehta, Ingrid Chen and Anthony DeAmorin (collectively “Respondents”). Simply stated, these Respondents and their petition circulators acted fraudulently in violation of Title 19 in purposefully deceiving voters into signing their petitions under false pretenses. Indeed, as set forth below, Petitioner believes that the misconduct here warrants referral to the County Prosecutor or Office of the Attorney General for violations of N.J.S.A. 19:34-2.

It appears that Respondents deceived voters by falsely claiming to voters that the petitions for which they sought endorsements were (1) for a different candidate, (2) for an office different than what was ultimately listed on the petitions submitted to your office, or (3) for a single council candidate where the petition that was submitted to your office was a joint petition. Such actions are not only a cause to reject these petitions in their entirety but are unlawful.

First, multiple voters were approached by a circulator and given the impression that they would be signing the petition of Lav Patel for council. The petition however eventually became the petition of Lav Patel for Mayor. Similarly, voters were approached to sign a petition for Anjana Patel for council. That petition however eventually became the petition of Anjana Patel for Mayor. Voters have attested that the information regarding the candidate was not fully completed at the time of endorsement which was a purposeful misrepresentation to those voters. Failure to complete the petition form in advance for seeking endorsements is directly violative of Title 19’s requirements and is direct evidence of Respondents attempts to obtain signatures under false pretenses. Enclosed are certifications of several voters attesting to these facts.

Several voters also reported that they were asked to sign the petition of Jayesh Mehta for Council. While this was acceptable, those voters later became aware that their endorsements were included in a joint petition for a slate of council candidates consisting of Jayesh Mehta, Ingrid

Chen and Anthony DeAmorin. Those voters would not have signed this joint petition. Again, the circulation of a petition for council and then conversion and inclusion of those endorsements into a joint petition for a slate of council candidates is not only improper but illegal. Additional certifications of voters attesting to these facts are enclosed.

As you know, N.J.S.A. 19:34-2 states that persons who falsely make or file a nominating petition knowing that any part of the petition was obtained falsely (e.g. through false pretenses) is guilty of a crime of the third degree. That appears to be the case here. Indeed, the Respondents actions here are reminiscent of those that were the subject of an indictment by the State following a petition challenge in 2021. See Democratic Party of New Jersey v. McCormick, STE-03284-21 (rejecting fraudulent nominating petitions for office of Governor).

There is also additional evidence of the Respondents conspiracy to violate the sanctity of the petition process here. For example, Lav Patel served as circulator for the petitions of Anjana Patel, in direct violation of the circulator affidavit which he signed under oath attesting not only that all of the signatures were obtain properly, but also that the petition “is prepared and filed in absolute good faith for the sole purpose of endorsing the person(s) therein named.” The obvious conflict and hypocrisy of one candidate for Mayor circulating the petitions for a different candidate for Mayor is self-evident. Further evidence of Respondents’ conspiracy is that they all share a slogan, despite there being two purportedly separate candidates for Mayor.

The above and enclosed voter certifications provide direct evidence of Respondents improper conduct. The only appropriate remedy for deception of the voters is rejection of all of these petitions in their entirety. We welcome examination of any of these Respondents 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.

Respectfully,

PEM LAW LLP

s/Rajiv D. Parikh

RAJIV D. PARIKH