

**BROWN & CONNERY LLP**

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*Attorneys for Plaintiffs*

**CAMDEN COUNTY DEMOCRATIC  
COMMITTEE, INC. and JAMES  
BEACH,**  
  
**Plaintiffs,**  
  
vs.  
  
**SUSAN DRUCKENBROD, RENA  
MARGULIS, AND DAVID STAHL,**  
  
**Defendants.**

**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION, CIVIL PART  
CAMDEN COUNTY**

**DOCKET NO. CAM-L-  
Civil Action**

**VERIFIED COMPLAINT**

Plaintiffs, Camden County Democratic Committee, Inc. and Committee Chairman, James Beach, by way of Verified Complaint, hereby allege as follows:

**Parties, Jurisdiction, and Venue**

1. Camden County Democratic Committee, Inc. (“County Committee”) is a non-profit county political party organized pursuant to Title 19, N.J.S.A. 19:1-1, et seq., with a principal address of 2240 Route 70 West, Cherry Hill New Jersey 08002.

2. At all relevant times, James Beach was and is a duly elected Senator in New Jersey’s 6th Legislative District and the Chairman of the County Committee.

3. Defendant, Susan Druckenbrod, was a candidate in the June 10, 2025 Primary Election seeking one (1) of seventy-four (74) open seats in the Cherry Hill Democratic Committee (“CH Committee”), to serve as the CH Committee’s official representatives on the County Committee.

4. Defendant, Rena Margulis, was a candidate in the June 10, 2025 Primary Election seeking one (1) of seventy-four (74) open seats in the CH Committee, to serve as the CH Committee's official representatives on the County Committee.

5. Defendant, David Stahl, was a candidate in the June 10, 2025 Primary Election seeking one (1) of seventy-four (74) open seats in the CH Committee, to serve as the CH Committee's official representatives on the County Committee (Druckenbrod, Margulis, and Stahl are hereinafter collectively referred to as the "Defendants").

6. Venue is proper in Camden County under R. 4:3-2(a)(2)-(3) as all relevant events in this matter occurred in Camden County, the election at issue pertains to Camden County, and all parties reside in Camden County.

7. Jurisdiction is conferred by this Court's inherent jurisdiction to consider and review election matters, as well as under R. 4:3-1(a)(5) where the primary relief sought is declaratory relief seeking to enforce Plaintiffs' legal rights and required injunctive relief to prevent Defendants from violating such legal rights.

**The Camden County Democratic Committee  
and the County Committee Bylaws**

8. Pursuant to N.J.S.A. 19:5-3, the County Committee has adopted the "Bylaws of Camden County Democratic Committee, Inc." ("County Bylaws"). A true and correct copy of the "Bylaws of Camden County Democratic Committee, Inc." (Revised 2024) is attached as **Exhibit A**.

9. Under Article I of the County Bylaws, the County Committee's stated objective is: "[T]o promote and foster good government on the local, county, state and national levels by procuring the election of those Democrat candidates nominated in the Democrat Primary Election." Id. at Article I.

10. Pursuant to N.J.S.A. 19:5-3.2, the County Bylaws are to be applied in a manner that ensures “fundamental fairness and the rights of the members of the County Committee in the governance of the County [Democrat] party.”

11. The County Bylaws recognize Chairman Beach, in his capacity as County Committee Chairman, as the “head of, and spokesperson for, the Democrat Party in Camden County” and obligate him to “faithfully abide by the[] Bylaws and execute the decisions of the County Committee.” Id. at Article V(1)(f).

12. Pursuant to Article V, Section 1(i) of the County Bylaws, “[w]henver a dispute occurs between different factions of the Democrat Party in a local municipality, it shall be the obligation of the County Chairperson to do everything in his power to resolve the dispute and also respect the rights of the duly elected County Committee members.” Id. at Article V(1)(i).

13. County Committee members must be registered Democrat voters in good standing and shall actually reside in the municipalities which they respectively represent. Id. at Article II(1).

14. With regard to electing its membership, Article II, Section 1 of the County Bylaws provides that: “members of the County Committee shall be elected bi-annually at the [Primary Election] in the manner provided by law for the selection of party candidates to be voted for at the general election by voters of a municipality.” Id.

15. In accordance with N.J.S.A. 19:5-3, County Committee members “shall take office by the third Saturday following the certification of the results of their election....”

16. Under County Bylaws, “[t]hirty percent (30%) of the full membership of the County Committee shall constitute a quorum for the transaction of business....” Id. at Article III(5).

### **The Cherry Hill Democratic Committee**

17. In accordance with N.J.S.A. 19:5-2 and Article II of the County Bylaws, County Committee members who are residents of Cherry Hill Township also serve as members of the Cherry Hill Democratic Committee (“CH Committee”). See Certification of Jeffrey L. Nash (“Nash Cert.”) at ¶7; Certification of Meryl Greene (“Greene Cert.”) at ¶9; and Certification of Jonathan P. Rardin (“Rardin Cert.”) at ¶10.

18. Members of the CH Committee are elected at the Primary Election by Cherry Hill Township residents who are registered Democrat voters. See Nash Cert. at ¶¶7-8; Greene Cert. at ¶¶9-10; and Rardin Cert. at ¶¶10-11.

19. The CH Committee has a well-established practice of relying on the County Bylaws for substantive and procedural matters of governance including, but not limited to, Voting Matters, Election of Committee Officers, Meeting Quorum Requirements, Meeting Order of Business, and Filling Vacancies in Committee Membership. See Nash Cert. at ¶¶3-4; Greene Cert. at ¶¶5-6; and Rardin Cert. at ¶¶4-6.

20. In accordance with the County Bylaws, the CH Committee is to be made up of 74 members, and a quorum of 22 of the 74 members of the Cherry Hill Democratic Committee is required for the CH Committee to take any action. See Exhibit A, County Bylaws, at Article III(5); see also Nash Cert. at ¶5; Greene Cert. at ¶8; and Rardin Cert. at ¶7.

### **The June 10, 2025 Primary Election**

21. Pursuant to N.J.S.A. 19:5-3 and Article II of the County Bylaws, County Committee members were to be elected at the June 10, 2025 Primary Election. See Exhibit A, County Bylaws, at Article II(1); see also Nash Cert. at ¶¶7-8; Greene Cert. at ¶¶9-10; and Rardin Cert. at ¶¶10-11.

22. The County Committee members to be elected included seventy-four (74) open seats for membership in the Cherry Hill Democratic Party who, in turn, would serve Cherry Hill Township's official representatives in the County Committee. See Exhibit A, County Bylaws, at Article II(1).

23. On or around March 24, 2025, the CH Committee filed its Nominating Petitions for the June 10, 2025 Primary Election, which included a full slate of candidates for the 74 open seats in the Cherry Hill Democratic Committee and County Committee (the "CH Committee Slate").

24. The CH Committee Slate requested to run under the slogan of "Camden County Democrat Committee, Inc.," signifying their endorsement by the County Committee.

25. On or around March 24, 2025, Defendants Druckenbrod, Margulis, and Stahl filed a Nominating Petition as part of the "South Jersey Progressive Democrats" slate, wherein the Defendants collectively sought three (3) of the 74 open seats in the CH Committee and County Committee (the "Three-Candidate Progressive Slate").

26. The Defendants were not endorsed by the County Committee in the June 2025 Primary Election.

27. Pursuant to N.J.S.A. 19:49-2, the Camden County Clerk placed the CH Committee Slate and the Three-Candidate Progressive Slate on the ballot for the June 2025 Primary Election under Column G, "Members of County Committee." A true and correct copy of the Official Democrat Primary Sample Election Ballot for Cherry Hill Township ("Primary Election Ballot") is attached hereto as **Exhibit B**.

28. The Three-Candidate Progressive Slate was placed on line G1 of the ballot, with the slogan: "South Jersey Progressive Democrats." Id.

29. The CH Committee Slate was placed below the Three-Candidate Progressive Slate on line G2 of the ballot, with the slogan: “Camden County Democratic Committee, Inc.” Id.

30. This was the first primary election for County Committee candidates since the federal court decisions in the matter of Kim v. Hanlon, No. 24-1098 (ZNQ) (TJB), 2024 U.S. Dist. LEXIS 57533, 2024 WL 1342568 (D.N.J. Mar. 29, 2024), aff’d 99 F.4th 140 (3d Cir. 2024) ordered changes to New Jersey’s ballot design, mandating the use of an office block ballot in place of the historically used county line ballot.

31. Due to the number of available positions and the limitations of ballot design, the voters of Camden County were not able to select individual candidates for the CH Committee, and voters were instead given a choice between the Three-Candidate Progressive Slate (with the listed names of the three candidates) and the CH Committee Slate (with the listed names of the 74 candidates). Id.

**Vote Totals from the June 10, 2025 Primary Election and  
the Resulting Vacancies in the CH Committee and County Committee Membership**

32. The Primary Election was held on June 10, 2025.

33. On June 23, 2025, the Camden County Clerk certified the Primary Election results.

34. Based on the certified results, the CH Committee Slate 3,350 votes and the Three-Candidate Progressive Slate received 5,547 votes. A true and correct copy of the referenced section of the Camden County Clerk Summary Results Report for Cherry Hill Township from the June 10, 2025 Primary Election (“Summary Results Report for Cherry Hill Township”) is attached hereto as **Exhibit C**.

35. Stated differently, 3,350 registered Democrat voters from Cherry Hill Township endorsed all 74 candidates on the CH Committee Slate, and 5,547 registered Democrat voters endorsed the three (3) candidates on the Progressive Slate. Id.

36. As the recipients of the highest vote total in the June 2025 Primary Election, the three (3) Defendants are duly elected members of the CH Committee and the County Committee.

37. Pursuant to N.J.S.A. 19:5-2, N.J.S.A. 19:5-3, and Article II of the County Bylaws, the three (3) Defendants will take office as CH Committee and County Committee members by the third Saturday following the County Clerk's certification of the Primary Election results.

38. The June 2025 Primary Election also resulted in a tie vote between the 74 individuals who ran on the CH Committee Slate as candidates for the remaining 71 seats in the CH Committee and County Committee. See Exhibit C, Summary Results Report for Cherry Hill Township.

39. Under N.J.S.A. 19:13-20, the 71 open seats are deemed to be "vacancies" that occurred "in the event of [an] inability to select a candidate because of a tie vote at [the] primary."

40. Pursuant to N.J.S.A. 19:13-20(a)(4): "In the case of an office to be filled by the voters of a portion of a single county, the candidate shall be selected by those members of the county committee of the party herein the vacancy has occurred who represent those portions of the county which are comprised in the district from which the candidate is to be elected."

41. The statutory procedures authorized by N.J.S.A. 19:13-20 are consistent with the County Bylaws' provisions applicable to "Vacancies," which provide, in pertinent part: "A vacancy in the office of a member of the County Committee caused by death, resignation, failure to elect or otherwise, shall be filled for the unexpired term by the municipal committee of the municipality wherein the vacancy occurs, if there is such a committee, and if not, by the County Chairperson." See Exhibit A, County Bylaws, at Article II(A)(4).

42. Because the vacancies in the CH Committee and County Committee arise from a tie vote in the Primary Election, N.J.S.A. 19:13-20(c) requires that the selection of individuals to

fill the vacancies “shall be made from among those who have thus received the same number of votes at the primary” which, here, are the 74 candidates on the CH Committee Slate who received 3,350 votes in the Primary Election. See Exhibit C, Summary Results Report for Cherry Hill Township.

**The Defendants’ Misguided and Inflated Sense of “Control”  
over the Cherry Hill Democratic Party**

43. At 9:22 p.m. in the evening of the Primary Election, with votes still being counted, the Defendants and the South Jersey Progressive Democrats posted a photograph of the ongoing vote tally for membership in the CH Committee and County Committee on the social media website “X,” with the statement: “...[W]e are excited to share that it looks like we took control of the party in [Cherry Hill Township].” The South Jersey Progressive Democrats’ “X” post at 9:22 p.m. on June 10, 2025 is attached hereto as **Exhibit D**.

44. On June 11, 2025, the South Jersey Progressive Democrats issued a Press Release stating, in-part: “[W]e had a landslide victory in Cherry Hill that resulted in South Jersey Progressive Democrats taking over all 74 seats in the municipal party.” The June 11, 2025 Press Release of South Jersey Progressive Democrats is attached hereto as **Exhibit E**.

45. The South Jersey Progressive Democrats’ June 11, 2025 Press Release further stated: “All 74 machine backed incumbents are now replaced by [Defendants] David Stahl, Susan Druckenbrod, and Rena Margulis of South Jersey Progressive Democrats.” Id.

46. The Press Release further stated the voters of Cherry Hill Township “finally [gave] progressives control of the Cherry Hill Democratic Organization” and “[w]e now control the party in one of Camden County’s largest municipalities....” Id.

47. Beginning on or around June 11, 2025, the South Jersey Progressive Democrats’ website includes a link and invitation titled, “Join the Cherry Hill Democratic Committee!” A true

and accurate image of the referenced invitation on the South Jersey Progressive Democrats' website is attached hereto as **Exhibit F**.

48. The website notice states: "Our three candidates who won this race – Susan Druckenbrod, Dave Stahl, and Rena Margulis – have been entrusted by the voters to fill the 71 municipal vacancies in the Cherry Hill Democratic Committee." Id.

49. The website notice further states: "If you are interested in potentially serving on the Cherry Hill Democratic Committee, please fill out this interest form and we will be in touch shortly." Id.

50. Upon information and belief, Defendants have attempted to adopt a Constitution and Bylaws for the CH Committee, despite not having a quorum to conduct business.

51. Upon information and belief, Defendants have also "appointed" several individuals to fill some of the 71 vacancies in the CH Committee, notwithstanding the fact that those individuals were not duly nominated or elected, and further failed to comply with the Nominating Petition requirements for individuals seeking election to the CH Committee and County Committee. A true and correct copy of the Cherry Hill Township Nominating Petition for Camden County Democrat Committee at the June 10, 2025 Primary Election is attached hereto as **Exhibit G**.

52. There is no indication that any of the individuals that Defendants have attempted to "appoint" meet the requirements for membership on the County Committee or CH Committee, under Article II, Section 1 of the County Bylaws, as some of the individuals believed to have been "appointed" are not even registered Democrats.

53. Any attempt by the Defendants to elect, appoint, or otherwise select individuals who are not among the 74 candidates of the CH Committee Slate – who are tied with the second

most votes (3,350) would violate N.J.S.A. 19:13-20 and the County Bylaws. See Nash Cert. at ¶14; Greene Cert. at ¶16; and Rardin Cert. at ¶17.

54. Such an attempt would further result in a miscarriage of the electoral process by disenfranchising the 3,350 registered Democrat voters in Cherry Hill Township who endorsed the 74 candidates on the CH Committee Slate.

55. Therefore, Plaintiffs seek declaratory and emergent relief from this Court to ensure the County Bylaws are applied and enforced consistent with their primary objective of ensuring fundamental fairness in the County Committee's decisions and actions.

### COUNT I

#### **(Declaratory and Emergent Relief: Ordering Defendants to Fill All Vacancies in the CH Committee by Selecting 71 of the 74 Candidates from the CH Committee Slate)**

55. Plaintiffs incorporate and re-allege the above paragraphs as if fully set forth herein.

56. Based on the certified results of the June 10, 2025 Primary Election, 3,350 registered Democrat voters from Cherry Hill Township endorsed all 74 candidates on the CH Committee Slate, and 5,547 registered Democrat voters endorsed the three (3) candidates on the Progressive Slate. See Exhibit C, Summary Results Report for Cherry Hill Township.

57. The June 10, 2025 Primary Election resulted in Defendants being elected to 3 of 74 open seats on the CH Committee.

58. The June 10, 2025 Primary Election further resulted in a tie vote between the 74 candidates on the CH Committee Slate, in connection with the remaining 71 open seats on the CH Committee and County Committee. Id.

59. Pursuant to N.J.S.A. 19:13-20, the aforementioned 71 open seats are deemed to be “vacancies” that occurred “in the event of [an] inability to select a candidate because of a tie vote at [the] primary.”

60. The procedures for filling vacancies as set forth in N.J.S.A. 19:13-20 apply “in the event of inability to select a candidate because of a tie vote at such primary.”

61. Because the vacancies at issue here arise from a tie vote between the 74 candidates on the CH Committee Slate, the pool of individuals who can be chosen to fill each vacancy is limited to the same 74 candidates.

62. Three-thousand, two-hundred and fifty-five (3,350) registered Democrat voters in Cherry Hill Township endorsed the 74 candidates on the CH Committee Slate by giving them the second highest vote total for the remaining 71 seats on the CH Committee. See Exhibit C, Summary Results Report for Cherry Hill Township.

63. Therefore, limiting the vacancy selections to the 74 candidates on the CH Committee Slate will ensure that the will of the voters is carried out to the greatest extent possible, as failing to fill the vacancies at issue from the candidates who received the next highest vote total would effectively disenfranchise the aforementioned 3,350 voters.

64. As Chairperson of the County Committee, Chairman Beach is vested with the authority to direct the Defendants to select individuals to fill the 71 vacancies in the membership of the CH Committee. See Exhibit A, County Bylaws, at Article I, Article V(1)(f), and Article V(1)(i)

65. Pursuant to N.J.S.A. 19:13-20 and the County Bylaws, Chairman Beach is further vested with the authority to limit the Defendants’ selection of individuals to fill the 71 vacancies to the 74 candidates on the CH Committee Slate. See Exhibit A, County Bylaws, at Article I, Article V(1)(f), and Article V(1)(i).

66. Pursuant to N.J.S.A. 19:13-20 and Article II of the County Committee Bylaws, the 71 vacancies in the membership of the CH Committee – and by extension the vacancies in the

County Committee – must be filled by the 74 individuals who were duly nominated and listed as candidates under the CH Committee Slate.

**WHEREFORE**, Plaintiffs demand the following declaratory and emergent relief:

- A.** A declaration that the 71 vacancies in the membership of the Cherry Hill Democratic Committee must be filled from among the 74 individuals who were duly nominated as candidates for the County Committee, on the CH Committee Slate;
- B.** Pursuant to N.J.S.A. 19:13-20(c), an Order compelling the Defendants, in their capacity as members of the County Committee residing in Cherry Hill, by a majority vote, to fill the 71 vacancies on the CH Committee from the 74 candidates who are tied with 3,350 votes received at the June 10, 2025 Primary Election in accordance with N.J.S.A. 19:13-20(c);
- C.** Chairman Beach shall provide notice to the members of the County Committee residing in Cherry Hill Township, as certified by the County Clerk, of the date, time, and place of the meeting at which the 71 vacancies on the Cherry Hill Democratic Committee shall be filled, which shall be held at least one (1) day following the date on which the notice is given;
- D.** Any and all other relief as the Court deems proper and just.

## COUNT II

### **(Emergent Relief: Enjoining and Restraining Defendants from Conducting CH Committee Meetings, Adopting Bylaws for the CH Committee, or Attempting to Fill the 71 Vacancies through Any Action(s) Inconsistent with the Relief Provided under Count I)**

67. Plaintiffs incorporate and re-allege the above paragraphs as if fully set forth herein.

68. The imminent threat presented by the Defendants' actions to the associational rights of the CH Committee and County Committee – and the registered Democrat voters of Cherry Hill Township – is of such a significant nature that it amounts to an irreparable harm in which the Court should intercede.

69. Pursuant to N.J.S.A. 19:5-3 and Article III, Section 5 of the County Bylaws, “Quorum,” the CH Committee may only take action at a meeting where thirty percent (30%) of the full membership of the CH Committee is present. See Exhibit A, County Bylaws, at Article III(5); see also Nash Cert. at ¶5; Greene Cert. at ¶8; and Rardin Cert. at ¶7.

70. The Defendants, who total three (3) members of the CH Committee, are unable to achieve a quorum of the CH Committee. See Exhibit A, County Bylaws, at Article III(5); see also Nash Cert. at ¶5; Greene Cert. at ¶8; and Rardin Cert. at ¶7.

71. Between June 10, 2025 and the present date, the Defendants have publicly demonstrated their opinion that they “control” the CH Democratic Committee. See Exhibit D, South Jersey Progressive Democrats' June 10, 2025 “X” post on June 10, 2025; see also Exhibit E, South Jersey Progressive Democrats' June 11, 2025 Press Release.

72. Upon information and belief, the Defendants' have taken several measures to begin filling the vacancies on the CH Committee and County Committee. See, e.g., Exhibit F, “Join the Cherry Hill Democratic Committee!” Invitation from South Jersey Progressive Democrats' Website.

73. Upon information and belief, the Defendants have “appointed” several individuals to fill the 71 vacancies in the CH Committee. Id.

74. Any attempt by the Defendants to elect, appoint, or otherwise select individuals who are not among the 74 candidates of the CH Committee Slate – who are tied with the second most votes (3,350) – would violate N.J.S.A. 19:13-20 and the County Bylaws. See Exhibit A, County Bylaws, at Article I, Article V(1)(f), and Article V(1)(i); see also Nash Cert. at ¶14; Greene Cert. at ¶16; and Rardin Cert. at ¶17.

75. The Defendants’ attempt to unilaterally fill the vacancies in the CH Committee would further result in a miscarriage of the electoral process by disenfranchising the 3,350 registered Democrat voters in Cherry Hill Township who endorsed the 74 candidates on the CH Committee Slate.

76. The County Committee is entitled to the protections and rights afforded by the County Bylaws, and is further entitled to have its Chairperson perform his duties under the County Bylaws without unlawful obstruction by the Defendants.

**WHEREFORE,** Plaintiffs demand a declaration from the Court, on an emergent basis, declaring that the Defendants are enjoined from doing, engaging in, or directing any person(s) from doing or engaging in any and all of the following:

- A. Noticing any organizational meetings of the Cherry Hill Democratic Committee;
- B. Holding any organizational meetings of the Cherry Hill Democratic Committee;
- C. Adopting or amending any bylaws on behalf of the Cherry Hill Democratic Committee; and
- D. Attempting to fill the 71 vacancies in the membership of the Cherry Hill Democratic Committee by electing or appointing any individuals who are not

among the 74 candidates from the CH Committee Slate who ran for membership in the CH Committee and County Committee, and are tied with 3,350 votes.

Respectfully submitted,  
**BROWN & CONNERY LLP**  
*Attorneys for Plaintiffs*

/s/ William M. Tambussi  
William M. Tambussi, Esquire

Dated: June 23, 2025

**R. 4:5-1 AND R. 4:6-1 CERTIFICATION**

I, William M. Tambussi, Esquire, do hereby certify as follows:

1. To the best of my knowledge, this matter is not the subject of any other action pending in any Court or of any pending arbitration proceeding.
2. To the best of my knowledge, no other action or arbitration proceeding is contemplated.
3. To the best of my knowledge, there are no other parties who should be joined in this litigation at this time. The investigation into this matter has only recently begun and is continuing, and I reserve the right to amend or supplement this certification as additional information becomes known.

Respectfully submitted,  
**BROWN & CONNERY LLP**  
*Attorneys for Plaintiffs*

/s/ William M. Tambussi  
William M. Tambussi, Esquire

Dated: June 23, 2025

**DESIGNATION OF TRIAL ATTORNEY**

In accordance with R. 4:25-4, William M. Tambussi, Esquire is hereby designated as trial counsel for Plaintiffs in the above-captioned matter.

Respectfully submitted,  
**BROWN & CONNERY LLP**  
*Attorneys for Plaintiffs*

/s/ William M. Tambussi  
William M. Tambussi, Esquire

Dated: June 23, 2025

**BROWN & CONNERY LLP**

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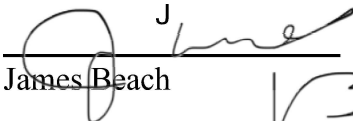
**SUPERIOR COURT OF NEW JERSEY  
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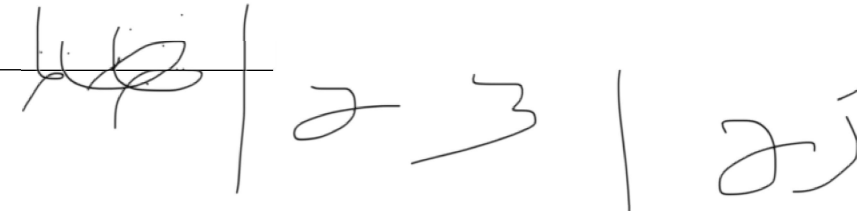
**DOCKET NO. CAM-L-  
Civil Action**

**VERIFICATION OF JAMES BEACH**

James Beach, of full age, verifies as follows:

1. I am a Plaintiff in this action. I am authorized on behalf of Plaintiffs to execute this Verification.
2. I have read the allegations of the Verified Complaint. Based on my knowledge and belief, I hereby verify that the allegations of the Verified Complaint are true and correct.

  
James Beach

Dated: 

**BROWN & CONNERY LLP**

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*Attorneys for Plaintiffs, Camden County Democratic Committee, Inc. and James Beach*

<p><b>CAMDEN COUNTY DEMOCRATIC COMMITTEE, INC. AND JAMES BEACH,</b></p> <p><b>Plaintiffs,</b></p> <p>vs.</p> <p><b>SUSAN DRUCKENBROD, RENA MARGULIS, AND DAVID STAHL,</b></p> <p><b>Defendants.</b></p>
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**SUPERIOR COURT OF NEW JERSEY**

**LAW DIVISION, CIVIL PART**

**CAMDEN COUNTY**

**DOCKET NO. CAM-L-**

**Civil Action**

**CERTIFICATION OF  
MERYL L. GREENE**

I, Meryl L. Greene, do hereby certify as follows:

1. I am a resident of Cherry Hill, New Jersey.
2. I have served as a member of the Cherry Hill Democratic Committee (“CH Committee”) and the Camden County Democratic Committee between 2009 and the present.
3. Between 2012 and 2013, I served as Co-Vice Chair of the CH Committee.
4. Between 2014 and 2025, I served as the Co-Chair of the CH Committee.
5. Throughout my experience with the CH Committee and during my term as Co-Chair of the CH Committee, the CH Committee followed the Bylaws adopted by the Camden County Democratic Committee (“County Committee Bylaws”), as amended from time to time.

Certification of Meryl L. Greene

6. During my term as CH Committee Co-Chair, the CH Committee relied on the County Committee Bylaws for procedural issues including, but not limited to, filling vacancies in the CH Committee membership, meeting quorum requirements, electing CH Committee officers, and the order of meeting agenda items.

7. During my tenure as a CH Committee member and as CH Committee Co-Chair, the CH Committee did not adopt any bylaws and instead relied on the County Committee Bylaws.

8. Based on the County Committee Bylaws, thirty-percent (30%) of the CH Committee constituted the required quorum for the CH Committee to hold an official meeting and to take any binding action on behalf of the CH Committee.

9. In my experience as a member of the Camden County Democratic Committee, the Committee members from Cherry Hill Township have been elected at the Primary Election on an every-other-year basis.

10. I am aware that the June 10, 2025 Primary Election included the election of Camden County Democratic Committee members, including individuals who would serve as members of the CH Committee as representatives from Cherry Hill Township.

11. I am aware that a slate of three individuals – David Stahl, Susan Druckenbrod, and Rena Margulis – from the “South Jersey Progressive Democrats” ran as candidates for membership on the CH Committee and the Camden County Democratic Committee in the June 10, 2025 Primary Election.

12. Based on the publicly available results of the June 10, 2025 Primary Election, I am aware that Stahl, Druckenbrod, and Margulis received 5,547 votes for the CH Committee.

13. Based on the publicly available results of the Primary Election, the CH Committee's slate of 74 candidates received 3,350 votes for the 74 open seats on the CH Committee.

14. I have reviewed several of the South Jersey Progressive Democrats' social media posts and Press Releases since June 10, 2025, which take the position that Stahl, Druckenbrod, and Margulis have "replaced" all 74 members of the CH Committee and now "control" the Democratic party in Cherry Hill Township. See Exhibit A, June 10, 2025 Social Media Post on "X" by South Jersey Progressive Democrats; see also Exhibit B, June 11, 2025 Press Release by South Jersey Progressive Democrats.

15. I am also aware that the South Jersey Progressive Democrats are actively seeking individuals who were not on the ballot as candidates for the County Committee or CH Committee at the June 10, 2025 Primary Election, and who they intend to appoint for the purpose of filling 71 vacancies on the CH Committee.

16. Based on my experience as a Camden County Democratic Committee member, as a CH Committee member, and as Co-Chair of the CH Committee, any attempt by three individuals to "control" the Democratic party in Cherry Hill by using their own standards and procedures to fill 71 vacant seats on the CH Committee would be inconsistent with the CH Committee's established practice of relying on the County Committee Bylaws.

I certify that the foregoing statements are true. If any of these statements are willfully false, I am subject to punishment.

  
Meryl L. Greene

Dated: 6/22/25

Certification of Meryl L. Greene

# EXHIBIT A



**South Jersey Progressive Democrats** @JerseyDemocrats · Jun 10 ...  
Election results are still being tabulated but we are excited to share that it looks like we took control of the party in [@CherryHillTwp.](#)  
[#DemocraticPrinciples](#)

**DEM Members of County Committee Cherry Hill Township**

Vote For 1

	TOTAL
South Jersey Progressive Democrats	3,853
Camden County Democrat Committee,	2,172
<b>Total Votes Cast</b>	<b>6,025</b>
<b>Precincts Reporting</b>	<b>11 of 48</b>

SuDru and David Stahl



6



14



57



3.4K



# **EXHIBIT B**



Last night, South Jersey Progressive Democrats scored a shocking upset victory. Though results in state races for Governor and State Assembly were not what we hoped for, **we had a landslide victory in Cherry Hill that resulted in South Jersey Progressive Democrats taking over all 74 seats in the municipal party.** In our race for the office of county committee in Cherry Hill, we bested the Norcross machine, capturing 5,045 votes to their 3,040. All 74 machine backed incumbents are now replaced by David Stahl, Susan Druckenbrod, and Rena Margulis of South Jersey Progressive Democrats.

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“A huge thank you to Cherry Hill voters for electing our team. We have been running since 2017 for this little know party office, educating ourselves and the voters along the way and last night our work paid off in this amazing win. We will continue to press the Camden County Democrats to live into a fairer, more just democracy; seeking out representatives in each and every district in Cherry Hill, talking about issues that are before us and elevating quality candidates who will honestly represent and work for our entire community. I’m excited to get to work!” said **Susan Druckenbröd of South Jersey Progressive Democrats**

**BROWN & CONNERY LLP**

William M. Tambussi, Esquire (031431983)

Michael J. Miles, Esquire (024862005)

360 Haddon Avenue

Westmont, New Jersey 08108

*Attorneys for Plaintiffs, Camden County Democratic Committee, Inc. and James Beach*

**CAMDEN COUNTY DEMOCRATIC  
COMMITTEE, INC. AND JAMES  
BEACH,**

**Plaintiffs,**

**vs.**

**SUSAN DRUCKENBROD, RENA  
MARGULIS, AND DAVID STAHL,**

**Defendants.**

**SUPERIOR COURT OF NEW JERSEY**

**LAW DIVISION, CIVIL PART**

**CAMDEN COUNTY**

**DOCKET NO. CAM-L-**

**Civil Action**

**CERTIFICATION OF  
JONATHAN P. RARDIN, ESQ.**

I, Jonathan P. Rardin, Esq., do hereby certify as follows:

1. I am a resident of Cherry Hill, New Jersey, and currently serve as the Chairman of the Cherry Hill Zoning Board of Adjustment.

2. I have served as a member of the Cherry Hill Democratic Committee ("CH Committee") and the Camden County Democratic Committee from 2010 to the present.

3. Between June 2017 and April 2023, I served as the Co-Chair of the CH Committee.

4. During my term as CH Committee Co-Chair, the CH Committee's procedures were governed by the Bylaws adopted by the Camden County Democratic Committee ("County Committee Bylaws"), as amended from time to time.

Certification of Jonathan P. Rardin, Esq.

5. The County Committee Bylaws provide that Committee membership should be apportioned among the municipalities located in Camden County based on the number of registered Democratic voters in each municipality, and that those members should be selected by the voters at the Primary Election, on a bi-annual basis.

6. The CH Committee relied on the County Committee Bylaws for procedural issues including, but not limited to, filling vacancies in the CH Committee membership, meeting quorum requirements, electing CH Committee officers, and the order of meeting agenda items.

7. In accordance with the County Committee Bylaws, thirty-percent (30%) of the CH Committee constituted the required quorum for the CH Committee to hold an official meeting and to take any binding action on behalf of the CH Committee.

8. During my tenure as a CH Committee member and as CH Committee Co-Chair, the CH Committee did not adopt any bylaws and instead relied on the County Committee Bylaws at all relevant times.

9. In my experience as a member of the Camden County Democratic Committee, the Committee members who resided in and represented the interests of Cherry Hill Township were duly elected during the Primary Election on a bi-annual basis.

10. I am aware that Camden County Democratic Committee members, including individuals who would serve as members of the CH Committee as representatives from Cherry Hill Township, were to be elected at the June 10, 2025 Primary Election.

11. I have reviewed the Official Results of the June 10, 2025 Primary Election, as Certified by the Clerk of Camden County, and I am aware that a slate of three candidates from the "South Jersey Progressive Democrats" received 5,547 votes for 74 open seats on the CH Committee.

Certification of Jonathan P. Rardin, Esq.

12. The three candidates running as “South Jersey Progressive Democrats” were David Stahl, Susan Druckenbrod, and Rena Margulis.

13. Based on the Official Results of the Primary Election, as Certified by the Clerk of Camden County, the CH Committee’s full slate of 74 candidates received 3,350 votes for the 74 open seats on the CH Committee.

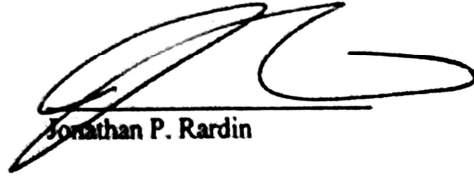
14. I have reviewed several public statements posted by the South Jersey Progressive Democrats on and after June 10, 2025, which claim that the incumbent members of the CH Committee “are now replaced by David Stahl, Susan Druckenbrod, and Rena Margulis of the South Jersey Progressive Democrats” and that those individuals “now control the [Democratic] party” in Cherry Hill Township.” See Exhibit A, June 10, 2025 Social Media Post on “X” by South Jersey Progressive Democrats; see also Exhibit B, June 11, 2025 Press Release by South Jersey Progressive Democrats.

15. I am also aware that the South Jersey Progressive Democrats are actively seeking individuals who were not on the ballot as candidates for the County Committee or CH Committee at the June 10, 2025 Primary Election, and who they intend to appoint for the purpose of filling 71 vacancies on the CH Committee.

16. In my experience as a Camden County Democratic Committee member and as Co-Chair of the CH Committee, I am not aware of any comparable situations where three Committee members were deemed to have “control” over the CH Committee, as David Stahl, Susan Druckenbrod, and Rena Margulis claim to have here.

17. Any attempt by Stahl, Druckenbrod, and Margulis, or anyone purportedly acting on their behalf, to unilaterally fill the 71 vacancies on the CH Committee in such a manner would be contrary to the requirements and principles of fairness set forth in the County Committee Bylaws.

I certify that the foregoing statements are true. If any of these statements are willfully false,  
I am subject to punishment.



Jonathan P. Rardin

Dated: 6/22/2025

Certification of Jonathan P. Rardin, Esq.

# **EXHIBIT A**



**South Jersey Progressive Democrats** @JerseyDemocrats · Jun 10 ...  
Election results are still being tabulated but we are excited to share that it looks like we took control of the party in [@CherryHillTwp.](#)  
[#DemocraticPrinciples](#)

DEM Members of County Committee Cherry Hill Township	
Vote For 1	TOTAL
South Jersey Progressive Democrats	3,853
Camden County Democrat Committee,	2,172
<b>Total Votes Cast</b>	<b>6,025</b>
<b>Precincts Reporting</b>	<b>11 of 48</b>

SuDru and David Stahl



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3.4K



## **EXHIBIT B**



Last night, South Jersey Progressive Democrats scored a shocking upset victory. Though results in state races for Governor and State Assembly were not what we hoped for, **we had a landslide victory in Cherry Hill that resulted in South Jersey Progressive Democrats taking over all 74 seats in the municipal party.** In our race for the office of county committee in Cherry Hill, we bested the Norcross machine, capturing 5,045 votes to their 3,040. All 74 machine backed incumbents are now replaced by David Stahl, Susan Druckenbrod, and Rena Margulis of South Jersey Progressive Democrats.

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--

**SUPERIOR COURT OF NEW JERSEY**

**LAW DIVISION, CIVIL PART**

**CAMDEN COUNTY**

**DOCKET NO. CAM-L-**

**Civil Action**

**CERTIFICATION OF  
JEFFREY L. NASH, ESQ.**

I, Jeffrey L. Nash, Esq., do hereby certify as follows:

1. I am a duly elected Commissioner on the Camden County Board of Commissioners and have served in that capacity since 1992.

2. Between 2013 and 2019, I served as Chairman of the Cherry Hill Democratic Committee (“CH Committee”).

3. During my term as CH Committee Chairman, the CH Committee’s procedures were governed by the Bylaws adopted by the Camden County Democratic Committee (“County Committee Bylaws”), as amended from time to time.

4. The CH Committee relied on the County Committee Bylaws for procedural issues including, but not limited to, quorum requirements for CH Committee meetings, elections of CH

Certification of Jeffrey L. Nash, Esq.

Committee officers, the order in which CH Committee meetings were conducted, and filling vacancies in the CH Committee membership.

5. Pursuant to the County Committee Bylaws, thirty-percent (30%) of the CH Committee constituted the required quorum for the CH Committee to hold an official meeting and for any action or business transaction to be binding on the CH Committee.

6. During my tenure as Chairman of the CH Committee, the CH Committee did not adopt any bylaws and instead relied on the County Committee Bylaws.

7. Throughout my tenure as Chairman of the CH Committee, the Camden County Democratic Committee members who resided in and represented the interests of Cherry Hill Township were duly elected during the Primary Election on a bi-annual basis.

8. I am aware that Camden County Democratic Committee members, including individuals who would serve as members of the CH Committee as representatives from Cherry Hill Township, were to be elected at the June 10, 2025 Primary Election.

9. Based on the Official Results of the Primary Election, as Certified by the Clerk of Camden County, a slate of three (3) candidates from the "South Jersey Progressive Democrats" received 5,547 votes for 74 open seats on the CH Committee.

10. The three candidates running as "South Jersey Progressive Democrats" were David Stahl, Susan Druckenbrod, and Rena Margulis.

11. Based on the Official Results of the Primary Election, as Certified by the Clerk of Camden County, the CH Committee's full slate of 74 candidates received 3,350 votes for the 74 open seats on the CH Committee.

12. I have reviewed public statements posted by the South Jersey Progressive Democrats on and after June 10, 2025, which claim that the incumbent members of the CH Committee "are now replaced by David Stahl, Susan Druckenbrod, and Rena Margulis of the


Certification of Jeffrey L. Nash, Esq.

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13. I am also aware that the South Jersey Progressive Democrats are actively seeking individuals who they intend to appoint for the purpose of filling 71 vacancies on the CH Committee, and who were not on the ballot as candidates for the County Committee or CH Committee at the June 10, 2025 Primary Election.

14. Any attempt by David Stahl, Susan Druckenbrod, and Rena Margulis to fill the 71 vacancies on the CH Committee in such a unilateral and overreaching manner, which they have publicly revealed, would contravene the County Bylaws’ primary objectives of ensuring fundamental fairness and honoring the will of the voters in all matters involving the County Committee’s membership and representation.

I certify that the foregoing statements are true. If any of these statements are willfully false, I am subject to punishment.

  
\_\_\_\_\_  
Jeffrey L. Nash

Dated: 6/23/25

Certification of Jeffrey L. Nash, Esq.

# EXHIBIT A



**South Jersey Progressive Democrats** @JerseyDemocrats · Jun 10

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[#DemocraticPrinciples](#)

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# EXHIBIT A



*Revised 2024*

**BY-LAWS OF CAMDEN COUNTY DEMOCRATIC COMMITTEE, INC.**

**ARTICLE I. NAME AND OBJECT**

**Name**

1. The name of this organization shall be the Camden County Democratic Committee, Inc. (hereinafter referred to as the County Committee).

**Object**

1. The object of this organization shall be to promote and foster good government on the local, county, state and national levels by procuring the election of those Democrat candidates nominated in the Democrat primary election.

**ARTICLE II. MEMBERSHIP, TERM AND VACANCIES**

**Membership**

1. The elected members of the County Committee shall be elected bi-annually at the primary for the general election in the manner provided by law for the selection of party candidates to be voted for at the general election by voters of a municipality. The County Committee shall be as equally divided as practicable between men and women (determined by gender self-identification). In the case of gender non-binary committee members, they shall not be counted as either a male or female, and the remainder of the delegation shall be as equally divided as practicable. Members of the County Democrat Committee must be registered Democrat voters in good standing and shall actually reside in the municipalities which they respectively represent.

### **Units of Representation**

2.02. Elected representation on the County Committee shall be as equally divided as practicable between men and women for every 750 registered Democrat voters or part thereof, from each municipality in the County of Camden. The number of registered Democrat voters shall be ascertained by examining the Official County Election Books and reviewed yearly thereafter for additions and deletions. The official number of Democrat registrations as established by the formula set forth above shall be certified by the Democratic Chief Clerk of the Camden County Board of Elections.

All elected County Committee members shall run at large in each municipality of the County, except those municipalities wherein the councilmatic governing body is elected in whole or in part by ward. In such municipalities, two members, as equally divided between male and female members as practicable, shall be elected from each ward.

### **Term**

3. The members of the County Committee shall take office on the first Saturday following their bi-annual election, on which day the terms of all members of such committees theretofore elected shall terminate.

### **Vacancies**

4. When a member of the County Committee ceases to be a resident of the district or municipality from which elected, a vacancy on the County Committee shall exist. A member of County Committee may resign the office to the Committee, and upon acceptance thereof by the Committee a vacancy shall exist. A vacancy in the office of a member of the County Committee caused by death, resignation, failure to elect or otherwise, shall be filled for the unexpired term by the municipal committee of the municipality wherein the vacancy occurs, if there is such committee, and if not, by the County Chairperson(s).

### **Voting Membership**

5. Each elected County Committee member shall be entitled to one vote.

## **ARTICLE III. MEETINGS**

### **Organizational Meeting**

1. The bi-annual reorganization meeting of the County Committee shall be held after the Primary Election of the reorganization year, not later than the first Tuesday after the Primary Election or within seven (7) days of the certification of the results of that Primary Election, whichever is later, at an appropriate time and place designated by the County Chairperson(s) in the call for a meeting unless circumstances, in the discretion of the County Chairperson(s), that may jeopardize the health, safety and/or welfare of the County Committee members require the postponement and rescheduling of the bi-annual reorganization meeting until such time as the bi-annual reorganization meeting may be held.

### **Regular Meetings**

2. Regular meetings shall be held at the call of the County Chairperson(s) at appropriate times and places designated by the County Chairperson(s).7PT371502

### **Special Meetings**

3. Special Meetings may be held at any time upon the call of the County Chairperson(s), majority of the Executive Committee, or upon the written request of fifty one (51%) percent of the elected members of the County Committee addressed to the County Chairperson(s) and the Secretary of the County Committee.

### **Right to Members to Speak**

4. Only those members who are elected to County Committee shall be entitled to attend County Committee meetings and speak. At the option of the County Chairperson(s), County Committee meetings may be open to non-members. Should the County Committee meeting be open to non-members, only County Committee members shall have the right to speak on county business. Non-members may be given the right to speak at the discretion of the County Chairperson(s).

### **Quorum**

5. Thirty (30%) percent of the full membership of the County Committee shall constitute a quorum for the transaction of business, subject to the limitations set forth in Article X.

### **Notice of Meetings**

6. Written notices of meetings, setting forth the place, date, and hour of meeting, shall be mailed and/or electronically communicated to all members as follows:

- a) Bi-Annual Reorganization Meeting: As soon as practicable after the Primary Election.
- b) Regular Meetings: At least seven (7) days prior to the date of the meeting.
- c) Special Meetings: At least seven (7) days prior to the date of such meetings, if possible, such notice to state the matter(s) to be considered at such meeting. If circumstances prevent the giving of such notice, then as much notice as possible shall be given in the most appropriate manner.

### **Order of Business**

7. At the appropriate hour set in the call for the meeting, if a quorum be present, the County Chairperson(s) shall call the meeting of the County Committee to order.

- a) At the Bi-Annual Reorganizational Meeting of the County Committee, the order of business shall be as follows:
  - 1) Salute to the Flag.
  - 2) Nominations of officers.
  - 3) Election of officers.
  - 4) Other business.

b) At all other meetings of the County Committee, the order of business shall be as follows:

- 1) Salute to the Flag.
- 2) Consideration of minutes of previous meeting.
- 3) Reports of Officers.
- 4) Reports of Executive Committee.
- 5) Reports of Standing Committee.
- 6) Reports of Special Committee.
- 7) Old Business.
- 8) New Business.
- 9) Good of the Order.

## **ARTICLE IV. ELECTION OF OFFICERS**

### **Qualifications**

1. Any registered Democrat residing in any of the 37 municipalities of Camden County shall be eligible to hold the offices of County Chairperson(s) or County First Vice Chairperson. The First Vice Chairperson shall be, to the extent practicable, of the opposite sex from the Chairperson. Only members of the County Committee shall be eligible to hold the offices of Secretary, Treasurer, or Sergeant at Arms of the County Committee.

### **Election of Chairperson and First Vice Chairperson**

2. The County Chairperson(s) and County First Vice Chairperson shall be elected at the bi-annual reorganization meeting.

### **Term**

3. All officers shall hold office until the next succeeding bi-annual reorganization meeting of the County Committee and until his or her successor

is elected or appointed.

### **Nominations for County Chairperson(s) and County First Vice Chairperson**

4. Candidates for the offices of County Chairperson(s) and County First Vice Chairperson shall have their names placed in nomination from the floor by any member of the County Committee. Each candidate shall have the opportunity of addressing the County Committee prior to a contested election at the County Committee meeting at which said election shall be held.

#### **Method of Election**

5. Elections shall be held as follows:

- a) If there is no contest for the office of the County Chairperson(s) or County First Vice Chairperson, the election shall be held by voice vote.
- b) If there is a contest for either office, the election for that office shall be by roll call vote to be called by the Secretary.
- c) In the event of a contest for either office, the successful candidate must receive fifty (50%) percent plus one (1) of the total number of votes cast for said office. An abstention shall not be considered a vote cast for purposes of determining the required total for election. In the event that on the first ballot no candidate receives the required total, then, in that event, there shall be a run-off election between the two candidates receiving the highest number of votes.

#### **Contested Elections**

6. The procedure for the conduct of contested elections shall be as follows:

- a) The balloting for County Chairperson(s) and for County First Vice Chairperson shall take place separately, with the balloting for County Chairperson(s) held first.
- b) Each candidate for office for which there is a contest may select one challenger to assist in the tally of the vote, with candidates for such office entitled to select the same challenger(s) if they so choose.

c) The Secretary, assisted by said challenger(s), shall conduct the election. Each member entitled to vote shall respond to the call of the Secretary and upon showing his or her credentials, if requested, shall voice his or her vote.

d) Each member must voice his or her own vote and may not delegate this right to anyone else. No member shall be permitted to vote unless he or she establishes that he or she is a duly elected member of the County Committee. Voting by proxy shall be permitted only by completion of the annexed certification form.

e) After each member entitled to vote has done so, the Secretary, assisted by the challenger(s), shall tally the votes and announce the name of the candidate who has received the largest number of votes for such contested office.

f) Some other suitable person designated by the incumbent County Chairperson(s) may perform the duties of the Secretary herein outlined in the Secretary's absence.

## **ARTICLE V. DUTIES OF OFFICERS**

### **County Chairperson(s)**

1. The County Chairperson(s) shall have the following duties:

a) To preside at all meetings of the County Committee and of the Executive Committee.

b) To appoint the following officers within thirty (30) days of assuming office as County Chairperson(s):

1) General Vice Chairperson(s)

2) Secretary

3) Treasurer.

4) Sergeant at Arms.

5) Solicitor and assistant Solicitors.

6) All members of the standing committees hereinafter defined.

In addition, the Chairperson may appoint an Executive Director and whatever other officers or committees he deems necessary and appropriate. All of these appointments shall be for a period of one (1) year until the next bi-annual reorganization of the County Committee.

c) To serve as ex-office member of all standing committees.

d) To faithfully abide by these By-Laws and execute the decisions of the County Committee.

e) To designate and approve the bracketing in the same column of the names of the candidates under the party slogan Camden County Democratic Committee, Inc.

f) To act as the titular head of, and spokesperson for, the Democrat Party in Camden County.

g) To co-sign with the Treasurer all checks disbursing funds of the County Committee.

h) To designate the presiding officer of any meeting in the absence of the Chairperson, or both in the event of co-chairpersons, and First Vice Chairperson.

i) Whenever a dispute occurs between different factions of the Democrat Party in a local municipality, it shall be the obligation of the County Chairperson(s) to do everything in his or her power to resolve the dispute and also respect the rights of the duly elected County Committee members.

### **County First Vice Chairperson**

2. The County First Vice Chairperson shall have the following duties:

a) To assist the County Chairperson(s) in the performance of his or her duties.

b) To, in the absence of the County Chairperson(s), or both in the event of co-chairpersons, preside at meetings of the County Committee.

### **County General Vice Chairperson(s)**

3. The County General Vice Chairperson(s) shall have the following duties:

a) To assist the County Chairperson(s) and the County First Vice Chairperson in the performance of their respective duties.

### **Secretary**

4. The Secretary shall have the following duties:

a) To take full and accurate minutes of all meetings of the County Committee and Executive Committee.

b) To file a typewritten copy of County Committee meeting minutes with the Executive Director within ten (10) days subsequent to any such meetings.

c) To have the minutes approved or corrected at the next County Committee meeting by a majority of the quorum present.

d) It shall be the duty of the Secretary to prepare and mail notices of all meetings of the County Committee and the Executive Committee and also send a copy of the minutes of the prior meeting to all members of the County Committee and the Executive Committee.

### **Treasurer**

5. The Treasurer shall have the following duties:

a) To be custodian of all funds paid to the County Committee.

b) To deposit all funds of the County Committee, in his/her custody, in such bank as the County Committee shall designate, subject to the joint

order of the County Chairperson(s) and himself/herself.

c) To maintain complete and accurate accounts of all monies received and disbursed by him or her.

d) Prepare and file such financial statements as may be required by law, and by direction of the County Committee, for all funds received by him/her.

e) To render at the direction of the County Chairperson(s) a complete financial report at each County Committee meeting. Said report shall be complete as to receipts and disbursements to date. Said report is to be approved by a majority of the quorum present.

f) Render an income statement and balance sheet as directed by the County Chairperson(s).

### **Executive Director**

6. The Executive Director shall have the following duties if appointed by the Chairperson:

a) To attend to the daily administration of the County Committee.

b) To establish and maintain suitable headquarters for the County Committee if funds are available for same.

c) To perform such other tasks as are assigned to him/her by the County Chairperson(s).

d) To attend to all matters of correspondence, as may be directed by the County Chairperson(s), the Executive Committee, or the County Committee.

e) To maintain all files, documents, and records of the County Committee.

### **Sergeant At Arms**

7. The Sergeant at Arms shall have the following duties:

- a) To assist the County Chairperson(s) in maintaining order at all County Committee meetings.
- b) To appoint such aides as he/she may deem necessary to facilitate the discharge of said duty.

### **Solicitors**

8. The Solicitor and Assistant Solicitors shall have the following duties:

- a) To counsel the County Committee on any contemplated action by the County Committee upon request or his/her own initiative.
- b) To counsel the County Committee in all other matters relating to, or affecting the interests of, the County Committee, upon request or his/her own initiative.

## **ARTICLE VI. EXECUTIVE COMMITTEE**

### **Membership**

1. The County Chairperson(s) may, within thirty (30) days subsequent to the bi-annual reorganization meeting of the County Committee, appoint an Executive Committee consisting of members who shall serve at the pleasure of the County Chairperson(s) who shall be members of the Democrat Party residing in the County of Camden.

### **Meetings**

2. Meetings of the Executive Committee shall be held at the call of the County Chairperson(s) or upon written call signed by the majority of the members of the Executive Committee. One member more than fifty (50) percent of the total membership of the Executive Committee shall constitute a quorum for the conduct of business.

### **Duties**

3. The Executive Committee shall have the following powers and duties:

a) To advise and assist the County Chairperson(s) in the administration of the County Committee, in the conduct of campaigns, in formulating party policy, in coordinating the activities of the standing committees and in the implementing the decisions of the County Committee.

b) To call special meetings of the County Committee pursuant to these By-Laws.

c) To present to the County Committee such recommendations as it may, by a majority vote, deem advisable on any matter.

d) To be consulted by the County Chairperson(s) on matters of patronage. The County Chairperson(s), or Executive Committee, shall not recommend on matters of patronage without the approval of the majority of the County Committee people in the nominees' own municipalities.

e) To act as a grievance committee.

## **ARTICLE VII. STANDING COMMITTEES**

1. There may be the following Standing Committees of the County Committee:

a) Finance Committee.

b) Registration Committee.

c) Rules Committee.

d) Campaign and Political Education Committee.

e) Entertainment Committee.

### **Membership**

2. Each of the above Standing Committees shall consist of County Committee members as follows:

a) A Chairman appointed by the County Chairperson(s) at the bi-annual reorganization meeting of the County Committee or within thirty (30)

days thereafter.

b) Five (5) to twelve (12) other members, appointed by the County Chairperson(s), at the bi-annual reorganization meeting of the County Committee or within thirty (30) days thereafter.

c) A quorum for the transaction of business for a Standing Committee shall consist of thirty (30%) percent of the membership of the Standing Committee. Approval of any action by the Standing Committee must be by a majority of the quorum present.

### **Duties**

3. The foregoing Standing Committees shall have the following duties:

a) Finance Committee. To conceive, formulate, and conduct, in conjunction with other appropriate committees, all fund-raising efforts and activities to adequately and properly fund all election campaigns and other necessary and proper activities of the County Committee, turning over the proceeds thereof to the Treasurer.

b) Registration Committee. To formulate and conduct all necessary and proper efforts to register persons desiring to vote.

c) Rules Committee. To consider and report upon, to the County Committee, all proposals for changing the within By-Laws, or, if deemed desirable, to initiate and report upon, to the County Committee, such proposals.

d) Campaign Committee.

1) To formulate and document issues for each campaign on the county level through continued scrutiny of the performance of office holders representing the people of Camden County.

2) To conceive, formulate, and provide appropriate and effective campaign advertisement, exposure, and coverage for Democrat programs, records, and candidates.

3) Coordinate such activities with appropriate organizations of the County Committee and local organizations, providing data, speakers, candidates, literature, and technical assistance to local organizations.

4) To assist the County Chairperson(s) in approaching news media and general public as spokesperson for the Democrat Party.

e) Entertainment Committee. To provide a year-round program of social activities on the county level coordinating same with the Finance Committee and Publicity Committee as well as the local organizations.

### **Reports**

4. Committees may report at each regular meeting of the County Committee and at such other times as requested to do so by the County Chairperson(s). Any report containing a recommendation for specific action by the County Committee shall be submitted in writing to the County Chairperson(s) at least five (5) days prior to the meeting at which such recommendation is to be considered.

## **ARTICLE VIII. SPECIAL COMMITTEES**

### **Special Committees**

1. The County Chairperson(s) from time to time may appoint such Special Committees for specific purposes as he/she may deem advisable.7PT371502

## **ARTICLE IX. APPOINTMENTS AND VACANCIES**

### **Appointments**

1. All appointments to paid positions or non-paid advisory positions must have the recommendation of a majority of the County Committee members from the municipality where the appointee resides.

### **Vacancies**

2. Vacancies in any office shall be filled in the manner in which the original office was filled at the next succeeding meeting of the County Committee, provided there has elapsed a thirty- day period between the occurrence of the vacancy and said meeting; otherwise, said vacancy shall be filled at the next succeeding meeting of the County Committee subsequent to the expiration of said thirty-day period.

### **Removal of Officers**

3. Any motion to remove for just cause any officer of this County Committee shall be submitted in writing to the County Chairperson(s). The County Chairperson(s) shall submit the motion to a special committee, appointed by the County Chairperson(s), for study and recommendation. The motion and any special committee recommendations shall be submitted to the entire County Committee at least thirty (30) days prior to the meeting at which such motion is scheduled to be considered and voted upon. Any such motion for removal shall be adopted only in the event that it is approved by an affirmative roll call voice vote of two-thirds of the entire membership of the County Committee.

## **ARTICLE X. EFFECTIVE DATES AND AMENDMENTS**

### **Effective Dates**

1. These By-Laws shall become effective immediately upon adoption.

### **Proposals of Amendments**

2. Any proposed amendment to these By-Laws initiated by the Rules Committee shall be submitted to the whole County Committee at least thirty (30) days prior to the date of the meeting at which said proposed amendment is to be considered and voted upon.

3. In the event an amendment is proposed by any other member, it shall be submitted in writing to the County Chairperson(s), who shall in turn submit it to the Rules Committee for study and recommendation. The Rules Committee shall then make the recommendation and submit a copy to the entire County Committee at least thirty (30) days prior to the meeting at which such proposed By- Law is scheduled to be considered and voted upon.

## Adoption of Amendments

4. Any proposed amendment shall be adopted only in the event that it is approved by an affirmative roll call vote of two-thirds of the entire membership of the County Committee. Any proposed amendment so adopted shall be effective immediately, unless the proposed amendment provides otherwise.

### CONTACT

Camden County Democratic Committee  
2240-15 Route 70 West, Cherry Hill NJ  
08002  
(856)424-5757  
camdencountydems@gmail.com

### FOLLOW

---

Paid for by the Camden County Democratic Committee, Inc, 2240-15 Route 70 West,  
Cherry Hill, NJ 08002

## **EXHIBIT B**

Cherry Hill Township  
Camden County

# OFFICIAL DEMOCRAT PRIMARY ELECTION BALLOT

June 10, 2025 - 6th Legislative District  
16 de junio del 2025 - 6o Distrito Legislativo

*Pamela R. Lampitt*  
**Pamela R. Lampitt**  
Secretaria del Condado

For each race, mark your ballot by filling in the circle next to the name of the candidate you wish to vote for. If you wish to vote for more than one candidate, mark the circles next to each name. If you wish to vote for a candidate who is not listed on this ballot, you may write the name in the space provided. If you wish to vote for a candidate who is not listed on this ballot, you may write the name in the space provided. If you wish to vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

<b>A</b>	<b>State Offices</b> Oficina de Estado	<b>Governor</b> (Vote For One) Gobernador	<b>Members of the Board of County Commissioners</b> (Vote For Two) Miembros del Comité del Condado
A1	Sean Spiller	E1	Edward T. McDonnell
A2	Steve Sweeney	E2	Colleen Bianco Bezzich
A3	Nico Spurrill		
A4	Steven Filipo		
A5	Ras J. Baraka		
A6	Josh Gotthelfner		
Write-In			
Per Seals			

<b>B</b>	<b>Members of the General Assembly</b> (Vote For Two) Miembros de la Asamblea General	<b>F</b>	<b>Municipal Offices</b> Oficina Municipal
B1	Rebecca Holloway	F1	William A. Carter, III
B2	Kevin Ryan	F2	Sergio A. Duchi
B3	Louis D. Greenwald	F3	Jill Hulinick
B4	Melinda Kane	F4	Rob Connor
Write-In			
Per Seals			

<b>C</b>	<b>County Offices</b> Oficina del Condado	<b>G2</b>	<b>Camden County Democrat</b>
C1	Michelle Gentle-Mayer		
Write-In			
Per Seals			

**INSTRUCTIONS TO VOTERS**  
This ballot will be read by machine. Fill in your choice.

1. To vote for candidates on this ballot, completely fill in the circle to the right of the candidate's name.

2. To vote for more than one candidate, fill in the circle to the right of each candidate's name.

3. To vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

4. To vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

5. To vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

DEM ED/EV Cherry Hill

This Official Primary Sample Ballot is an exact copy of the Official Primary Election Ballot to be used on Primary Election Day. This ballot cannot be voted.

Esta muestra es una copia idéntica de la Papeleta Oficial de las Elecciones Primarias que será utilizada el día de las elecciones. Usted no podrá votar en esta papeleta.

# OFFICIAL ELECTION SAMPLE BALLOT

Tuesday, June 10, 2025  
Polis Open 6 am - 8 pm

## MUESTRA OFICIAL DE LA PAPELETA

Los Colegios Electorales estarán abiertos de 6 am hasta las 8 pm  
martes, 10 de junio del 2025

<b>A</b>	<b>State Offices</b> Oficina de Estado	<b>Governor</b> (Vote For One) Gobernador	<b>Members of the Board of County Commissioners</b> (Vote For Two) Miembros de la Junta de Comisionados del Condado
A1	Jack Chatterell	E1	Christiam A. Navarro
A2	Justin Barbera	E2	Robert Stone
A3	Bill Sanders		
A4	Mario M. Kranjac		
A5	Jon Bramnick		
Write-In			
Per Seals			

<b>B</b>	<b>Members of the General Assembly</b> (Vote For Two) Miembros de la Asamblea General	<b>F</b>	<b>Municipal Offices</b> Oficina Municipal
B1	John M. "Jack" Brangan		
B2	Peter Sykes		
Write-In			
Per Seals			

<b>C</b>	<b>County Offices</b> Oficina del Condado	<b>D</b>	<b>Member of the Board of County Commissioners - Unopposed Term</b> (Vote For One) Miembro de la Junta de Comisionados del Condado - Termina No Venido
C1	Adam Nieves	D1	Shane Bernal
Write-In		Write-In	
Per Seals		Per Seals	

**INSTRUCTIONS TO VOTERS**  
This ballot will be read by machine. Fill in your choice.

1. To vote for candidates on this ballot, completely fill in the circle to the right of the candidate's name.

2. To vote for more than one candidate, fill in the circle to the right of each candidate's name.

3. To vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

4. To vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

5. To vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

REP ED/EV Cherry Hill

Cherry Hill Township  
Camden County

# OFFICIAL REPUBLICAN PRIMARY ELECTION BALLOT

June 10, 2025 - 6th Legislative District  
10 de junio del 2025 - 6o Distrito Legislativo

*Pamela R. Lampitt*  
**Pamela R. Lampitt**  
Secretaria del Condado

For each race, mark your ballot by filling in the circle next to the name of the candidate you wish to vote for. If you wish to vote for more than one candidate, mark the circles next to each name. If you wish to vote for a candidate who is not listed on this ballot, you may write the name in the space provided. If you wish to vote for a candidate who is not listed on this ballot, you may write the name in the space provided. If you wish to vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

<b>A</b>	<b>State Offices</b> Oficina de Estado	<b>Governor</b> (Vote For One) Gobernador	<b>Members of the Board of County Commissioners</b> (Vote For Two) Miembros de la Junta de Comisionados del Condado
A1	Jack Chatterell	E1	Christiam A. Navarro
A2	Justin Barbera	E2	Robert Stone
A3	Bill Sanders		
A4	Mario M. Kranjac		
A5	Jon Bramnick		
Write-In			
Per Seals			

<b>B</b>	<b>Members of the General Assembly</b> (Vote For Two) Miembros de la Asamblea General	<b>F</b>	<b>Municipal Offices</b> Oficina Municipal
B1	John M. "Jack" Brangan		
B2	Peter Sykes		
Write-In			
Per Seals			

<b>C</b>	<b>County Offices</b> Oficina del Condado	<b>D</b>	<b>Member of the Board of County Commissioners - Unopposed Term</b> (Vote For One) Miembro de la Junta de Comisionados del Condado - Termina No Venido
C1	Adam Nieves	D1	Shane Bernal
Write-In		Write-In	
Per Seals		Per Seals	

**INSTRUCTIONS TO VOTERS**  
This ballot will be read by machine. Fill in your choice.

1. To vote for candidates on this ballot, completely fill in the circle to the right of the candidate's name.

2. To vote for more than one candidate, fill in the circle to the right of each candidate's name.

3. To vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

4. To vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

5. To vote for a candidate who is not listed on this ballot, you may write the name in the space provided.

REP ED/EV Cherry Hill

**CAMDEN COUNTY  
COMMISSIONER OF VOTER REGISTRATION**  
100 UNIVERSITY CT.  
P.O. BOX 158  
BLACKWOOD, NJ 08012



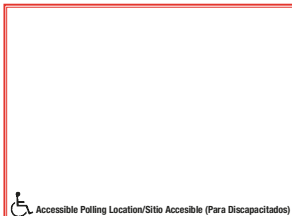
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BELLMAWR, NJ  
Permit No. 1042

# June 10, 2025

## Primary Election Sample Ballot Papeleta de Muestra de las Elecciones Primarias

**Polls Open**  
Los colegios abren de  
**6 am - 8 pm**

**YOUR POLLING PLACE / SU COLEGIO ELECTORAL**



Accessible Polling Location/Sitio Accesible (Para Discapacitados)

**CHERRY HILL TOWNSHIP**

**Please Help Keep Our Voter Records Accurate  
to Ensure Efficiency and Prevent Waste.**

**If the person on the front of this Sample Ballot  
www.camdencounty.com/updatevoter  
does not live at this address, please visit  
www.camdencounty.com/updatevoter**

**Por favor ayude a mantener nuestros registros  
de votantes precisos para asegurar la eficiencia  
y prevenir el desperdicio.**

**Si la persona que está al frente de esta  
papeleta de muestra, no vive en esta dirección, por favor visite  
www.camdencounty.com/updatevoter**

### Early Voting

Registered voters can vote in-person prior to Election Day.

Voters can visit any of the seven locations located throughout Camden County and vote their local ballot on a voting machine.

Like voting on Election Day, to prevent voting more than once, if you were issued a Vote By Mail Ballot, you can vote early only by provisional ballot.

**Hours for Early Voting:**

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
June 1	2	3	4	5	6	7
		10am to 8pm	10am to 8pm	10am to 8pm	10am to 8pm	10am to 8pm
10am to 6pm	9	*Primary Election Day	7	8	9	10

\* Early Voting Locations are not open on Election Day – See front for your Election Day Polling Place.

### Early Voting Locations Lugares de Votación Temprana

**Gloucester Township**  
Elections & Archive Center  
100 University Court, Blackwood 08012

**Camden City**  
Rowan University  
129 N. Broadway, Camden 08102  
(Broadway Entrance)

**Cherry Hill**  
Cherry Hill Community Center  
820 Mercer Street, Cherry Hill 08002

**Collingswood**  
Collingswood Senior Center  
30 W. Collings Avenue, Collingswood 08108

**Runnemede**  
Harry Williams Community Center  
2 Broadway, Runnemede 08078

**Voorhees**  
Lion's Lake Community Center  
101 Dutchtown Road, Voorhees 08043

**Winslow**  
Bud Duble Community Center  
33 Cooper Folly Road, Atco 08004

### Votación Temprana

Los votantes registrados pueden votar en persona antes del día de las elecciones.

Los votantes pueden visitar cualquiera de los siete lugares ubicados a través el Condado de Camden durante el Período de Votación Temprana y votar en una máquina de votación igual que si estuviera votando el día de las elecciones.

Para evitar votar más de una vez, si usted recibió una papeleta de votar por correo, puede votar temprano solo en una papeleta provisional.

**Horarios para Votación Temprana:**

Domingo	Lunes	Martes	Miércoles	Jueves	Viernes	Sábado
Junio 1	2	3	4	5	6	7
		10am to 8pm	10am to 8pm	10am to 8pm	10am to 8pm	10am to 8pm
10am to 6pm	9	*Primarias Día de Elección	11	12	13	14

\* Los lugares de votación temprana no estarán abiertos el día de las elecciones. Al frente de esta papeleta puede ver su lugar de votación del día de las elecciones.

### Voting by Mail Deadline Approaching Soon

If you are not able to vote at the Polls or at an Early Voting Site, there is still time to receive a Vote by Mail Ballot. The application must be received by the County Clerk's Office by June 3rd. For an application and more information about Vote by Mail, please call (856) 225-7219 or visit [www.camdencounty.com/vbm](http://www.camdencounty.com/vbm)

### Bring this Sample Ballot to the Polls for Faster Check-In

Electronic Pollbooks are now being used for both Early and Election Day Voting. These Electronic Pollbooks have the option to read the barcode on this sample ballot to quickly find your name in the voter registry.

### Ya Pronto Se Acerca La Fecha Límite Para Votar Por Correo

Si no puede votar en las urnas o en un sitio de votación temprana, todavía hay tiempo para recibir una papeleta de voto por correo. La solicitud debe ser recibida por la Oficina del Secretario del Condado antes del 3 de junio. Para una solicitud y más información sobre Voto por Correo, llame al (856) 225-7219 o visite [www.camdencounty.com/vbm](http://www.camdencounty.com/vbm)

### Lleve esta Papeleta de Muestra a las Urnas para una Registración Más Rápida

Los libros de votación electrónicos ahora se están utilizando tanto para la votación temprana como para la votación del día de las elecciones. Estos libros de votación electrónicos tienen la opción de leer el código de barras en esta papeleta de muestra para encontrar rápidamente su nombre en el registro de votantes.

# EXHIBIT C

COUNTY OF CAMDEN

OFFICIAL  
ELECTION  
RESULTS

2025 Primary Election  
June 10, 2025



Making It Better, Together.

Summary Results Report  
2025 Primary Election  
June 10, 2025

OFFICIAL RESULTS  
Pamela R. Lampitt, County Clerk  
Camden County

DEM Members of County Committee Ward 3 Camden City - Ward 3

Vote For 1

TOTAL

Camden County Democrat Committee,	826
Total Votes Cast	826
Overvotes	0
Undervotes	334
Contest Totals	1,160

DEM Members of County Committee Ward 4 Camden City - Ward 4

Vote For 1

TOTAL

Camden County Democrat Committee,	855
Total Votes Cast	855
Overvotes	0
Undervotes	292
Contest Totals	1,147

DEM Members of Council Cherry Hill Township

Vote For 4

TOTAL

Jill Hulnick	9,869
William A. Carter, III	9,813
Sangeeta Doshi	9,758
Rob Connor	9,680
Write-In Totals	184
Total Votes Cast	39,304
Overvotes	44
Undervotes	7,900
Contest Totals	47,248

DEM Members of County Committee Cherry Hill Township

Vote For 1

TOTAL

South Jersey Progressive Democrats	5,547
Camden County Democrat Committee,	3,350
Total Votes Cast	8,897
Overvotes	1,235
Undervotes	1,680
Contest Totals	11,812

## **EXHIBIT D**



**South Jersey Progressive Democrats** @JerseyDemocrats · Jun 10 ...  
Election results are still being tabulated but we are excited to share that it looks like we took control of the party in [@CherryHillTwp.](#)  
[#DemocraticPrinciples](#)

**DEM Members of County Committee Cherry Hill Township**

Vote For 1

	TOTAL
South Jersey Progressive Democrats	3,853
Camden County Democral Committee,	2,172
<b>Total Votes Cast</b>	<b>6,025</b>
<b>Precincts Reporting</b>	<b>11 of 48</b>

SUDru and David Stahl

6 14 57 3.4K

# **EXHIBIT E**



Last night, South Jersey Progressive Democrats scored a shocking upset victory. Though results in state races for Governor and State Assembly were not what we hoped for, **we had a landslide victory in Cherry Hill that resulted in South Jersey Progressive Democrats taking over all 74 seats in the municipal party.** In our race for the office of county committee in Cherry Hill, we bested the Norcross machine, capturing 5,045 votes to their 3,040. All 74 machine backed incumbents are now replaced by David Stahl, Susan Druckenbrod, and Rena Margulis of South Jersey Progressive Democrats.

“Last night’s win in Cherry Hill was a stunning achievement. In an election in which South Jersey Democratic voters generally did not vote for change, voters in Cherry Hill selected our slate for party office, finally giving progressives control of the Cherry Hill Democratic organization. I think one takeaway from last night’s victory is the power of persistence. We’ve run in the past, even when all odds were stacked against us, in order to give voters the opportunity to vote against the Norcross machine and for progressive change. Cherry Hill voters finally took us up on that offer. We now control the party in one of Camden County’s largest municipalities and a Democratic stronghold and continue to control the party in Merchantville. We, South Jersey Progressive Democrats, are at last a sizeable force within the Camden County Democratic Committee and we look forward to using our numbers to effect real change,” said **Kate Delany of South Jersey Progressive Democrats**

“A huge thank you to Cherry Hill voters for electing our team. We have been running since 2017 for this little know party office, educating ourselves and the voters along the way and last night our work paid off in this amazing win. We will continue to press the Camden County Democrats to live into a fairer, more just democracy; seeking out representatives in each and every district in Cherry Hill, talking about issues that are before us and elevating quality candidates who will honestly represent and work for our entire community. I’m excited to get to work!” said **Susan Druckenbröd of South Jersey Progressive Democrats**

## **EXHIBIT F**



Q Log in

# Join the Cherry Hill Democratic Committee!

Interest Form



## SIGN UP NOW

First name \*

Last name \*

Email \*

Mobile number (optional)

ZIP code \*

What Cherry Hill neighborhood are you in? \*

What's the best way for us to reach you?

Sign Up to Get Involved!

Powered by Mobilize

By clicking the button above, you agree to Mobilize's [Terms of Service](#) and [Privacy Policy](#). Mobilize is a service provider and will share your information with the event organizer, who may contact you. Message and data rates may apply. Text STOP to cancel, HELP for help.

I want to receive text messages from South Jersey Progressive Democrats about how to stay involved.

## Details

On June 10th, South Jersey Progressive Democrats were elected at-large by Democratic Party voters to county committee in Cherry Hill, based on a progress-focused platform. Our three candidates who won this race--Susan Druckenbrod, Dave Stahl, and Rena Margulis--have been entrusted by the voters to fill the 71 municipal vacancies in the Cherry Hill Democratic Committee.

One of the main tenets of South Jersey Progressive Democrats is transparency. We are deeply committed to participatory democracy. We want to see more people get involved in the Democratic Party and we want our party to reflect the diversity of our communities.

We encourage everyone who is interested in joining the Cherry Hill Democratic Committee to fill out this form, even if they have or have never previously served on the municipal committee.

This is a time to come together and focus on our collective goal. We need to build a broad party coalition ahead of the general election in the midst of an unprecedented national authoritarian climate. And, of course, we cannot lose sight


of supporting meaningful local and regional efforts to improve our everyday lives. The voters have decided. This is an exciting time for community growth and empowerment.

If you are interested in potentially serving on the Cherry Hill Democratic Committee, please fill out this interest form and we will be in touch shortly!

Thank you for your interest!

 [Log in to promote this action](#)

 [Share on Facebook](#)

 [Share on Bluesky](#)

 [Share via email](#)

 [Copy invite link](#)

[Contact organization](#)

## Tags

[County Committee Meeting](#), [Democratic Party](#), [Democrats](#)

## More events from South Jersey Progressive Democrats

[See more events](#)



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[Status page](#)

# **EXHIBIT G**

TOTAL NUMBER OF SIGNATURES ON PETITION \_\_\_\_\_

MUST BE FILED WITH CLERK NO LATER THAN **March 24, 2025**

BEFORE 4:00 PM

**THIS BLANK FORM TO BE USED FOR NOMINATION FOR TOWNSHIP OFFICERS**

**Nomination by Petition for Primary Election**

To Patti Chacker, Clerk of Cherry Hill Township, State of New Jersey:

We, the undersigned, hereby certify that we reside in the Township of Cherry Hill, of the County of Camden, New Jersey and that we are qualified voters therein, that we are members of the **Democratic Party**, and that we intend to affiliate with the said party at the ensuing election: that we endorse the persons herein after mentioned as candidates for nomination to the offices of **Member of the County Committee**, and we request that you cause to be printed upon the official primary ballot of said party the name or names of said person or persons as the candidates for such nomination. We further certify that the offices for which said person or persons are named, the residences and post office addresses of the said person or persons so endorsed are as follows:

NAME	RESIDENCE	CITY, ZIP CODE	E-Mail Address
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We, further certify that the said person or persons so endorsed are legally qualified, under the laws of this State, to be nominated for said offices, and are members of the political party named above.

**PETITIONER'S SIGN SHEET**

**Signature and address must be written in the signer's own handwriting:**

<u>PRINT NAME</u>	<u>SIGNATURE</u>	<u>STREET ADDRESS</u>	<u>CITY &amp; ZIP CODE</u>
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The witness taking the affidavit below must be the person who obtained the names on this set of signatures or several sets of signatures. He must take the affidavit as witness for each set he solicits, but must sign only one signature sheet.

**STATE OF NEW JERSEY,  
COUNTY OF CAMDEN, :SS**

\_\_\_\_\_ being duly sworn, upon his oath, that he is one of the signers of this petition; that such petition is signed by each of the signers thereof in his own proper handwriting; that each of the signers is, to the best knowledge and belief of deponent, a legal voter in the said State of New Jersey, County of Camden, as stated in the said petition, and belongs to the political party named in the said petition, and that such petition is prepared and filed in absolute good faith for the sole purpose of endorsing the person herein named in order to secure his nomination or selection as stated in the said petition.

Sworn to and subscribed

before me this \_\_\_\_\_

Day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
Signature of Notary Public, Attorney or other person  
Authorized under New Jersey law to administer oath

\_\_\_\_\_  
(Signature of Witness)

\_\_\_\_\_  
(Address of Witness)

\_\_\_\_\_  
(City or Town)

**CANDIDATES REQUEST FOR DESIGNATION ON THE OFFICIAL PRIMARY BALLOT**

The candidate herein, having been endorsed for the office mentioned in this petition, does hereby request that there be printed opposite his name on the said primary ballot the following designation:

\_\_\_\_\_  
 (Must not exceed six words and must be in accord with R.S. 19:23-17)

**CERTIFICATE OF ACCEPTANCE TO BE SIGNED BY CANDIDATE**

I/We, the undersigned, hereby certify that I/We are a member of the \_\_\_\_\_ Party, and qualified for the office mentioned in this petition; that I/We are a resident of and a legal voter in the jurisdiction of the office for which the nomination is to be made; that I/We consent to stand as a candidate for nomination at the ensuing primary election, and that if nominated I/We agree to accept the nomination.

OFFICE TO BE FILLED	PRINT NAME	SIGNATURE OF CANDIDATES
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**“NOTICE: ALL CANDIDATES ARE REQUIRED BY LAW TO COMPLY WITH THE PROVISIONS OF THE NEW JERSEY CAMPAIGN CONTRIBUTIONS AND EXPENDITURES REPORTING ACT. FOR FURTHER INFORMATION, PLEASE CALL ELEC AT (609) 292-8700 OR TOLL FREE WITHIN NJ AT 1-888-313-ELEC (3532).”**  
[www.elec.state.nj.us](http://www.elec.state.nj.us) “

**THIS OATH OR OATHS MUST BE ATTACHED TO THE PETITION  
STATE OF NEW JERSEY, COUNTY OF CAMDEN, :SS**

I \_\_\_\_\_ do solemnly swear (or affirm) that I will support the constitution of the United States and Constitution of the State of New Jersey, and that I will bear true faith and allegiance to the same and to the governments established in the United States under the authority of the people, so help me God.

\_\_\_\_\_

**Sworn to and subscribed**

**before me this \_\_\_\_\_ day of \_\_\_\_\_ 2022**

\_\_\_\_\_  
Signature of Notary Public, Attorney or other person  
authorized under New Jersey law to administer oath

**N.J.S.A.41:1-1**

**EVERY PERSON WHO IS OR SHALL BE REQUIRED BY LAW TO GIVE  
ASSURANCE OF FIDELITY AND ATTACHMENT TO THE GOVERNMENT OF  
THIS STATE SHALL TAKE THE ABOVE OATH OF ALLEGIANCE**



**BROWN & CONNERY, LLP**

William M. Tambussi, Esq. (ID No. 031431983)  
Michael J. Miles, Esq. (ID No. 024862005)  
William F. Cook, Esquire (ID No. 012122003)  
360 Haddon Avenue  
P.O. Box 539  
Westmont, New Jersey 08108  
(856) 854-8900  
Attorneys for Plaintiff

CAMDEN COUNTY DEMOCRATIC  
COMMITTEE, INC. and JAMES BEACH,  
  
Plaintiffs,  
  
vs.  
  
SUSAN DRUCKENBROD, DAVE STAHL, and  
RENA MARGULIS,  
  
Defendants.

**SUPERIOR COURT OF NEW JERSEY**  
LAW DIVISION, CIVIL PART  
CAMDEN COUNTY

Docket No.:

Civil Action

**Temporary Restraining Order and  
Order to Show Cause Why  
Preliminary Injunction  
Should Not be Entered**

**THIS MATTER** having been brought before the Court by Plaintiffs, Camden County Democratic Committee, Inc. (“CCDC”) and James Beach (collectively, “Plaintiffs”), by and through its attorneys Brown & Connery, LLP, and the Court having considered the facts set forth in the Verified Complaint and the Brief in Support of Plaintiffs’ Motion for Preliminary Injunction, and good cause having been shown:

**IT IS** on this \_\_\_\_ day of June, 2025,

**ORDERED** that the Defendants, Susan Druckenbrod, Dave Stahl, and Rena Margulis (collectively, “Defendants”), shall appear and show cause before the Superior Court of New Jersey, Chancery Division, General Equity Part, Camden County, located at 101 S. 5th Street, Camden, New Jersey 08103, Courtroom \_\_\_\_, at \_\_\_\_\_ o’clock or as soon thereafter as counsel

may be heard, on the \_\_\_\_ day of June, 2025 why a preliminary injunction, as requested in Plaintiffs' Verified Complaint should not be granted;

**IT IS FURTHER ORDERED AND ADJUDGED** that Defendants are hereby temporarily restrained and enjoined from conducting an organizational meeting of the Cherry Hill Democratic Committee, adopting bylaws for the Cherry Hill Democratic Committee, or attempting to fill the 71 open seats on the Cherry Hill Democratic Committee;

**IT IS FURTHER ORDERED AND ADJUDGED** that true but uncertified copy of this Order to Show Cause, Verified Complaint, and Brief in Support of Motion for Preliminary Injunction, along with supporting documents be served on Defendants by hand delivery or overnight courier within \_\_\_\_ days from the date hereof; proof of such service may be by certification;

**IT IS FURTHER ORDERED AND ADJUDGED** that Defendants shall, not later than \_\_\_\_ days from the date of service of this Order to Show Cause, file a written response with the Clerk of the Court; in default thereof, the action may proceed ex parte and the Court may enter final judgment against Defendants for the relief requested in the Verified Complaint;

The Court will hear argument, but not testimony, on the return date of the Order to Show Cause, unless the Court and Parties are advised to the contrary no later than \_\_\_\_ days before the return date.

\_\_\_\_\_  
, J.S.C.

**BROWN & CONNERY, LLP**

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Attorneys for Plaintiff

CAMDEN COUNTY DEMOCRATIC  
COMMITTEE, INC. and JAMES BEACH,

Plaintiffs,

vs.

SUSAN DRUCKENBROD, DAVE STAHL,  
and RENA MARGULIS,

Defendants.

**SUPERIOR COURT OF NEW JERSEY**  
LAW DIVISION, CIVIL PART  
CAMDEN COUNTY

Docket No.:

Civil Action

**Order**

**THIS MATTER** having been brought before the Court by Plaintiffs, Camden County Democratic Committee, Inc. (“CCDC”) and James Beach (collectively, “Plaintiffs”), by and through its attorneys Brown & Connery, LLP, and the Court having considered the facts set forth in the Verified Complaint and the submissions of the parties, along with any oral argument, and good cause having been shown:

**IT IS** on this \_\_\_\_ day of June, 2025,

**ORDERED** that Defendants shall be and hereby are enjoined from conducting an organizational meeting of the Cherry Hill Democratic Committee, adopting bylaws for the Cherry Hill Democratic Committee, or attempting to fill the 71 open seats on the Cherry Hill Democratic Committee; and

**IT IS FURTHER ORDERED** that, within one day of the date of this Order, the Chairperson of the CCDC provide notice to the members of the CCDC residing in Cherry

Hill, as certified by the County Clerk, of the date, time, and place of the meeting at which the 71 vacancies on the Cherry Hill Democratic Committee shall be filled, which shall be held at least one day following the date on which the notice is given; and

**IT IS FURTHER ORDERED** that the members of the CCDC residing in Cherry Hill, as certified by the County Clerk, by a majority vote, shall fill the 71 vacancies on the Cherry Hill Democratic Committee from among the 74 candidates who have thus received the same number of votes at the primary in accordance with N.J.S.A. 19:13-20(c); and

**IT IS FURTHER ORDERED** that a copy of this Order shall be served on all parties within five (5) days of receipt by counsel for Plaintiffs.

---

, J.S.C.

Opposed

Unopposed

**BROWN & CONNERY, LLP**

William M. Tambussi, Esq. (ID No. 031431983)

Michael J. Miles, Esq. (ID No. 024862005)

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Attorneys for Plaintiffs

CAMDEN COUNTY DEMOCRATIC  
COMMITTEE, INC. and JAMES BEACH,

Plaintiffs,

vs.

SUSAN DRUCKENBROD, DAVE STAHL, and  
RENA MARGULIS,

Defendants.

**SUPERIOR COURT OF NEW JERSEY**  
LAW DIVISION, CIVIL PART  
CAMDEN COUNTY

Docket No.:

Civil Action

**Brief in Support of Plaintiff's  
Motion for Preliminary Injunction**

**INTRODUCTION**

This case involves the ongoing efforts of three individuals to overturn the results of the June 10, 2025 primary election and usurp the role of the voters of Cherry Hill.

The results of the primary election determine the members of the Camden County Democratic Committee from the Township of Cherry Hill. Seventy-Four (74) seats on the County Committee are allocated under that organization's bylaws to residents of Cherry Hill, and are to be filled by the voters of Cherry Hill. There were seventy-seven (77) candidates for those seats. Because of the space limitations on the ballot, those candidates were grouped based upon their affiliation with one of two groups: "South Jersey Progressive Democrats," or "Camden County Democratic Committee, Inc." As a

result, voters did not have the ability to choose their preferred 74 candidates. Rather, voters could only choose one of the two groups.

The South Jersey Progressive Democrats received the greatest number of votes. However, that group was only able to field 3 candidates. The remaining 71 seats, by operation of New Jersey law and the Bylaws of the County Committee, are awarded to the next highest vote getter. In this case, because of unique and unprecedented ballot design issues, it was not possible for voters to select individually from the 74 Camden County Democratic Committee candidates, who all therefore tied for the next highest vote total. In fact, the Camden County Democratic Committee candidates were placed on the ballot in a disadvantageous position that the South Jersey Progressive Democrats often refer to as “Ballot Siberia.”

Rather than accept the results of the election, and acknowledge the statutory method for filling vacancies created by a tie vote from amongst the candidates who tied for the next highest vote total, Defendants, without a quorum, seek to unilaterally select individuals who never sought the position, were never deemed qualified to stand as a candidate for the position, and never received a single vote in this Primary Election for the position. Effectively, they want to disenfranchise the 3,255 voters who gave the 74 tied candidates the next highest vote total, and pack the committee with their friends. That is not how democracies work.

Plaintiffs now seek an injunction to prevent Defendants from unlawfully packing the committee with their friends, and compel that the 71 vacant seats created by the tie vote be filled from among the 74 qualified candidates that the voters gave the next highest vote total to, as required by law.

### **FACTUAL BACKGROUND**

Camden County Democratic Committee, Inc. (“CCDC”) is a non-profit county political party organized pursuant to Title 19, N.J.S.A. 19:1-1, et seq., with a principal address of 2240 Route 70 West, Cherry Hill New Jersey 08002. (See Verified Complaint at ¶ 1.) CCDC’s stated objective is “to promote and foster good government on the local, county, state and national levels by procuring the election of those Democrat candidates nominated in the Democrat Primary Election.” (Id., Ex. A, Bylaws of Camden County Democratic Committee, Inc. (Revised 2024), at Art. I.) Pursuant to N.J.S.A. 19:5-3, the County Committee has adopted the Bylaws of Camden County Democratic Committee, Inc. (“Bylaws”). (Id. at ¶ 8.) In accordance with N.J.S.A. 19:5-3.2, the Bylaws are to be applied in a manner that ensures “fundamental fairness and the rights of the members of the County Committee in the governance of the County [Democrat] party.” (Id. at ¶ 10.)

James Beach was and is a duly elected Senator in New Jersey’s 6th Legislative District and the Chairman of the County Committee. (Id. at ¶ 2.) In his capacity as County Committee Chairman, the Bylaws recognize Chairman Beach as the “head of, and spokesperson for, the Democrat Party in Camden County” and obligate him to “faithfully abide by the[] Bylaws and execute the decisions of the County Committee.” (Id. at ¶ 11.) Pursuant to Article V, Section 1(i) of the Bylaws, “[w]henever a dispute occurs between different factions of the Democrat Party in a local municipality, it shall be the obligation of the County Chairperson to do everything in his power to resolve the dispute and also respect the rights of the duly elected County Committee members.” (Id. at ¶ 12.)

Pursuant to Article II, Section 2.1 of the Bylaws, “members of the County Committee shall be elected bi-annually at the [Primary Election] in the manner provided by law for the selection of party candidates to be voted for at the general election by voters of a municipality.” (Id. at ¶ 14.) In accordance with N.J.S.A. 19:5-3, County Committee members “shall take office by the third Saturday following the certification of the results of their election....” (Id. at ¶ 15.)

County Committee members must be registered Democrat voters in good standing and shall actually reside in the municipalities which they respectively represent. (Id. at ¶ 13.) Under Section 3.5 of the Bylaws, “[t]hirty percent (30%) of the full membership of the County Committee shall constitute a quorum for the transaction of business....” (Id. at ¶ 16.)

In accordance with N.J.S.A. 19:5-2 and Article II of the County Committee Bylaws, County Committee members who are residents of Cherry Hill Township also serve as members of the Cherry Hill Democratic Committee (“CH Committee”). (Id. at ¶ 17.) Members of the CH Committee are elected at the Primary Election by Cherry Hill Township residents who are registered Democrat voters. (Id. at ¶ 18.) The CH Committee has a well-established practice of relying on the County Committee Bylaws for substantive and procedural matters of governance including, but not limited to, Voting Matters, Election of Committee Officers, Meeting Quorum Requirements, Meeting Order of Business, and Filling Vacancies in Committee Membership. (Id. at ¶ 19.)

Pursuant to N.J.S.A. 19:5-3 and Article II of the Bylaws, County Committee members were to be elected at the June 10, 2025 Primary Election. (Id. at ¶ 21.) The County Committee members to be elected included seventy-four (74) open seats for

membership in the Cherry Hill Democratic Party who, by operation of N.J.S.A § 19:5-2, would serve Cherry Hill Township’s official representatives in the County Committee. (Id. at ¶ 22.) In accordance with the County Bylaws, the CH Committee is to be made up of 74 members, and a quorum of 22 of the 74 members of the Cherry Hill Democratic Committee is required for the CH Committee to take any action. (Id. at 20.)

On or around March 24, 2025, the CH Committee filed its Nominating Petitions for the June 10, 2025 Primary Election, which included full slate of candidates for the seventy-four (74) open seats for membership in the Cherry Hill Democratic Committee and County Committee (the “CH Committee Slate”). (Id. at ¶ 23.) The CH Committee Slate requested and authorized to run under the slogan of “Camden County Democrat Committee, Inc.,” signifying their endorsement by the County Committee. (Id. at ¶ 24.)

On or around March 24, 2025, Defendants Druckenbrod, Margulis, and Stahl filed a Nominating Petition as part of the “South Jersey Progressive Democrats,” wherein the Defendants sought election to three (3) of the seventy-four (74) open seats in the CH Committee and County Committee (the “Three-Candidate Progressive Slate”). (Id. at ¶ 25.) Defendants were not endorsed by the County Committee in the June 2025 Primary Election. (Id. at ¶ 26.)

Pursuant to N.J.S.A. 19:49-2, the Camden County Clerk placed the CH Committee Slate and the Three-Candidate Progressive Slate on the ballot for the June 2025 Primary Election under Column G, “Members of County Committee.” (Id. at ¶ 27.) The Three-Candidate Progressive Slate was placed on line G1, with the slogan: “South Jersey Progressive Democrats.” (Id. at ¶ 28.) The CH Committee Slate was placed below the Three-Candidate Progressive Slate on line G2, with the slogan: “Camden

County Democratic Committee, Inc.” (Id. at ¶ 29.) This was the first primary election for County Committee candidates since the federal court decisions in the matter of Kim v. Hanlon, No. 24-1098 (ZNQ) (TJB), 2024 U.S. Dist. LEXIS 57533, 2024 WL 1342568 (D.N.J. Mar. 29, 2024), aff’d 99 F.4th 140 (3d Cir. 2024) ordered changes to New Jersey’s ballot design, mandating the use of an office block ballot in place of the historically used county line ballot. (Id. at ¶ 30.)

Due to the number of available positions and the limitations of new office block ballot design method, the voters of Camden County were not able to select individual candidates for the CH Committee, and voters were instead only given a choice between the Three-Candidate Progressive Slate (with the listed names of the three candidates) and the CH Committee Slate (with the listed names of the 74 candidates). (Id. at ¶ 31.) As shown below in Appendix I, the ballot design left a large gap between the two slates of candidates. (Id., Ex. B.)

The Primary Election was held on June 10, 2025. (Id. at ¶ 32.) The CH Committee Slate received 3,255 votes and the Three-Candidate Progressive Slate received 5,439 votes. (Id. at ¶ 34.) The Three-Candidate Progressive Slate were the recipients of the highest vote totals and, in accordance with the terms of Article II, Section 1 of the County Bylaws and N.J.S.A § 19:5-3, are entitled to 3 of the 74 open seats on the CH Committee and County Committee. (Id. at ¶¶ 36-37.) As to the remaining 71 positions on the CH Committee and County Committee, there was a tie for the next highest vote recipients. (Id. at ¶ 38.) Because of the limitations of the new office block ballot, the 74 candidates running as part of the County Committee Slate all

received the same number of votes, thereby creating a tie vote for the remaining 71 open seats in the CH Committee and County Committee. (Id. at ¶ 38.)

At 9:22 p.m. in the evening of the Primary Election, with votes still being counted, the Defendants and the South Jersey Progressive Democrats posted a photograph of the ongoing vote tally for membership in the CH Committee and County Committee on the social media website “X,” with the statement: “...[W]e are excited to share that it looks like we took control of the party in [Cherry Hill Township].” (Id. at ¶ 43.)

On June 11, 2025, the South Jersey Progressive Democrats issued a Press Release stating, in-part: “[W]e had a landslide victory in Cherry Hill that resulted in South Jersey Progressive Democrats taking over all 74 seats in the municipal party.” (Id. at ¶ 44.) The South Jersey Progressive Democrats’ June 11, 2025 Press Release further stated: “All 74 machine backed incumbents are now replaced by [Defendants] David Stahl, Susan Druckenbrod, and Rena Margulis of South Jersey Progressive Democrats.” (Id. at ¶ 45.) The Press Release further stated the voters of Cherry Hill Township “finally [gave] progressives control of the Cherry Hill Democratic Organization” and “[w]e now control the party in one of Camden County’s largest municipalities....” (Id. at ¶ 46.)

Beginning June 11, 2025 through the present, the South Jersey Progressive Democrats’ website has included a link and invitation titled, “Join the Cherry Hill Democratic Committee!” (Id. at ¶ 47.) The website notice states: “Our three candidates who won this race – Susan Druckenbrod, Dave Stahl, and Rena Margulis – have been entrusted by the voters to fill the 71 municipal vacancies in the Cherry Hill Democratic Committee.” (Id. at ¶ 48.) The website notice further states: “If you are interested in

potentially serving on the Cherry Hill Democratic Committee, please fill out this interest form and we will be in touch shortly.” (Id. at ¶ 49.)

On June 19, 2025, the Camden County Clerk certified the Primary Election results. (Id. at ¶ 33.) As the recipients of the highest vote total in the June 2025 Primary Election, the Defendants are duly elected members of the CH Committee and the County Committee. (Id. at ¶ 36.) Pursuant to N.J.S.A. 19:5-2, N.J.S.A. 19:5-3, and Article II of the County Committee Bylaws, Defendants will take office by the third Saturday following the County Clerk’s certification of the Primary Election results, which is July 5, 2025. (Id. at ¶ 37.)

Under N.J.S.A. 19:13-20, the 71 open seats are deemed to be “vacancies” occurring “in the event of [an] inability to select a candidate because of a tie vote at [the] primary.” (Id. at ¶ 39.) Because the vacancies in the CH Committee and County Committee arise from a tie vote in the Primary Election, § 19:13-20(c) requires that the selection of individuals to fill the vacancies “shall be made from among those who have thus received the same number of votes at the primary” which, here, are the 74 candidates on the CH Committee Slate who received 3,255 votes in the Primary Election. (Id. at ¶ 42.)

Nonetheless, upon information and belief, Defendants have attempted to adopt a Constitution and Bylaws for the CH Committee, despite not having a quorum to conduct business. (Id. at ¶ 50.) Defendants are further believed to have “appointed” several individuals to fill some of the 71 vacancies in the CH Committee. (Id. at ¶ 51.) There is no indication that any of the individuals that Defendants have attempted to “appoint” meet the requirements for membership on the County Committee or CH Committee,

under Article II, Section 1 of the County Bylaws, as some of the individuals believed to have been “appointed” are not even registered Democrats. (Id. at ¶ 52.)

Therefore, Plaintiffs now seek declaratory and emergent relief from this Court to ensure that New Jersey law and the County Bylaws are applied and enforced consistent with their primary objective of ensuring fundamental fairness in the County Committee’s decisions and actions.

### **LEGAL ARGUMENT**

It is well-settled that to obtain temporary relief, a plaintiff must: (1) show that such relief is necessary to prevent irreparable harm; (2) show that the legal right underlying the claim is settled; (3) make a preliminary showing of probability of ultimate success on the merits; and (4) show that he will suffer greater hardship if injunctive relief is denied than the opposing party will if it is granted. Crowe v. DeGioia, 90 N.J. 126, 132-34 (1982); Ispahani v. Allied Domecq Retailing USA, 320 N.J. Super. 494, 498 (App. Div. 1999). Each of these factors must be clearly and convincingly demonstrated. Waste Mgmt. of N.J., Inc. v. Morris County Mun. Utilities Auth., 433 N.J. Super. 445, 452 (App. Div. 2013). All four Crowe factors favor the imposition of temporary restraints in this matter.

#### **I. Plaintiff Will Suffer Irreparable Harm If the Relief Is Denied that Cannot Be Redressed by Monetary Damages.**

Temporary restraints are necessary to prevent irreparable harm in this case, because Defendants are attempting to substitute their personal preferences for the will of the voters by soliciting individuals to fill the 71 open seats on the CHDC and attempting to create bylaws for the CH Committee without a quorum for conducting business.

Defendants' improper conduct is trampling upon Plaintiffs' constitutional right to association. "The freedom to associate with the political party of one's choice is an important part of this right." Freidland v. State, 149 N.J. Super. 483, (Law Div. 1977); see also Williams v. Rhodes, 393 U.S. 23, 30 (1968). "[P]olitical parties from the early days of the Republic represented differences of philosophy and thought in relation to governmental policy; and they are now regarded as a necessary adjunct to representative government." Bontempo v. Carey, 64 N.J. Super. 51, (Law Div. 1960). This extends to primary elections. See id. ("The primary is a substitute for the party convention, in an area identified with the essential public interest."); see also Wene v. Meyner, 13 N.J. 185, 192-193 (1953).

It is well settled that "partisan political organizations enjoy freedom of association protected by the First and Fourteenth Amendments." Id. at 224. "Freedom of association means not only that an individual voter has the right to associate with the political party of her choice, but also that a political party has a right to identify the people who constitute the association, and to select a standard bearer who best represents the party's ideologies and preferences." Id. (citations and internal quotations omitted).

Through its Bylaws, the County Committee established that its membership should be apportioned amongst the municipalities comprising Camden County according to the number of registered Democratic voters in each municipality. (See Verified Complaint, Ex. A, County Bylaws, at Art. II, §§ 1, 2.02.) And that those members should be selected at the primary election by the voters. (Id., Ex. A, at Art. II, § 1.) In this fashion, the County Committee intended that its membership would be representative of the Democratic voters of Camden County. In the absence of injunctive relief, the

membership of the County Committee would be disproportionately skewed by three individuals.

The New Jersey Supreme Court noted in Richardson v. Caputo, 46 N.J. 3, 9 (1965) that “[t]he purpose of a ballot is to permit voters to record their will.” (emphasis added). The physical space limitations of the new office block ballot in this instance prevented voters from selecting their preferred 74 candidates from among the 77 potential choices. Indeed, it was not possible for 77 names to appear with an oval next to them given the space constraints of the new office block ballot design. However, that in no way limits the impact of the fact that 3,255 voters, by selecting the CCDC slate, recorded their will to be represented on the County Committee by those individuals. Nor does it limit the fact that even the 5,439 voters who selected the 3 progressive candidates would have been able to select 71 additional candidates from the CCDC slate if not prevented from doing so by the limits of the ballot. The current vacancies exist only because of the unique and unprecedented limitations of the physical ballot in this election in the Township of Cherry Hill.

While voters intended Defendants to be members of the County Committee, and they will be, voters did not express any desire for those individuals to be “empowered,” as they claim, to unilaterally control the membership of the CH Committee. Granting them that power would violate the County Committee’s clear First and Fourteenth Amendment rights to associate in the manner ordained by the County Committee’s Bylaws.

Similarly, the attempts of Defendants to adopt a new Constitution and Bylaws for the CH Committee, despite the fact that they are only 3 members, violates the clear

quorum requirements set by the County Committee. Under the County Bylaws, “[t]hirty percent (30%) of the full membership of the County Committee shall constitute a quorum for the transaction of business....” (Verified Complaint, Ex. A, at Art. III, § 5.) These requirements have historically been applied by the CH Committee as well, and can only be changed upon the action of a sufficient quorum of the CH Committee’s members. Since, under the County Bylaws, the CH Committee is to be made up of 74 members, a quorum would require the participation of 22 of the 74 members of the Cherry Hill Democratic Committee for the CH Committee to take any action. Again, Defendants are attempting to ram through their own agenda in violation of the County Committee’s clear First and Fourteenth Amendment rights to associate in the manner ordained by the County Committee’s Bylaws.

Money damages could not possibly compensate for these harms. The threat presented by actions of Defendants to the associational rights of the County Committee and the Democratic voters of Camden County is of such a significant nature that it amounts to an irreparable harm, and this court should intercede.

## **II. Plaintiff’s Claim is Based on a Well Settled Right.**

It is well settled under New Jersey law that vacancies in a public office resulting from a tie vote in an election are to be filled from amongst the candidates that received the tie number of votes. N.J.S.A. 19:13-20(c). That is because vacancies resulting from a tie vote are inherently different from other types of vacancies. When a vacancy is created because an office holder or candidate dies, resigns, or moves out of a district, for example, there is no opportunity to glean the will of the voters. In that scenario, the statutes fall back on the next best thing: the choice of the committee of the political party

whose member vacated the office. See generally N.J.S.A §§ 19:5-2 and -3, 13-20. Where, however, vacancies result from a tie vote, there is clear evidence of whom the voters wished to fill a position—the individuals who received the tie number of votes. See N.J.S.A. 19:13-20(c).

The election of members of the County Committee must be conducted in the manner provided in Title 19 of the New Jersey Statutes. N.J.S.A § 19:5-3. The procedures for filling a vacancy set forth in N.J.S.A § 19:13-20 apply “in the event of inability to select a candidate **because of a tie vote** at such primary.” N.J.S.A. 19:13-20(c). “In the case of an office to be filled by the voters of a portion of a single county, the candidate shall be selected by those members of the county committee of the party herein the vacancy has occurred who represent those portions of the county which are comprised in the district from which the candidate is to be elected.” N.J.S.A § 19:13-20(a)(4). This is consistent with who is empowered to fill vacancies on a municipal committee by N.J.S.A § 19:5-2, and on a county committee by N.J.S.A § 19:5-3.

Because the “vacancy” at issue here arises from a tie vote, as opposed to other types of vacancies that are addressed by N.J.S.A §§ 19:5-2 and -3, neither of which expressly reference tie votes, the pool of individuals that can be chosen to fill the vacancy is limited. “Whenever a selection is to be made pursuant to this section to fill a vacancy resulting from inability to select a candidate because of a tie vote at a primary election for the general election, the selection shall be made from among those who have thus received the same number of votes at the primary.” N.J.S.A § 19:13-20(c). This operates to ensure that the will of the voters is carried out to the greatest extent possible. Failing to fill the “vacancies” at issue from the candidates who received the next highest vote

total would effectively disenfranchise the 3,255 voters who gave the 74 County Committee candidates the highest vote total for the 71 remaining positions.

It is also well settled under New Jersey law that election laws must be construed in a liberal manner that encourages public participation in the elections process and upholds to will of the voters. See Kilmurray v. Gilfert, 10 N.J. 435, (1952); N.J. Democratic Party v. Samson, 175 N.J. 178, 190 (2002) (holding in the absence of explicit direction from the Legislature, the Court has construed N.J.S.A. 19:13-20 to promote the goals underlying our election laws – to ensure an opportunity for voters to exercise their right of choice in harmony with an orderly process for the handling of ballots); Catania v. Haberle, 123 N.J. 438, 448 (1990) (holding absent a public interest adequately strong enough to show that the Legislature intended strict enforcement of the law, statutes providing requirements for a candidate’s name to appear on the ballot will not be construed so as to deprive the voters of the opportunity to make a choice); Deamer v. Jones, 42 N.J. 516, (1964) (election statutes should be liberally construed); Sadloch v. Allan, 25 N.J. 118 (1957) (same); Wene v. Meyner, 13 N.J. 185 (1953) (election laws are liberally construed to protect voters’ franchise). Election laws should not be construed in a way that may deprive voters of their franchise or renders an election void for technical reasons. See Filippone v. O’Connor, 116 N.J. Super. 399, 402-403 (Law Div. 1971) (upholding election of write-in candidates for members of municipal and county committees despite technical issues).

As noted above, the current vacancies exist only because of the unique and unprecedented limitations of the physical ballot in this election in the Township of Cherry Hill. Had there been sufficient space on the ballot, the voters could have selected

their preferred 74 candidates from among the 77 potential choices. Instead, some voters were effectively forced to surrender their right to choose 71 additional members of the committee. This unique and unprecedented ballot design issue created by the recent changes to New Jersey's historic ballot design practice should not disenfranchise the voters who made their choice for those 71 seats known. Richardson, 46 N.J. at 9 (“The purpose of a ballot is to permit voters to record their will . . . .”). The law is thus well settled that Plaintiff is entitled to have the vacancies at issue filled from among the 74 candidates who tied for the next highest vote total.

The law is equally well settled that political parties should be given great deference to govern their own internal operations. “Historically, courts have been most reluctant to interfere in intraparty controversies in the absence of the violation of a controlling statute or the infringement of a clear legal right.” Deamer v. Jones, 42 N.J. 516, 520 (1964); see also Bontempo v. Carey, 64 N.J. Super. 51, 61 (Law Div. 1960) (“[C]ourts are reluctant to interfere with party machinery so long as it conforms to statutory provisions.”). Permitting Defendants to adopt a new Constitutions and Bylaws for the CH Committee without a quorum to conduct business, would be wading into the internal operations of the County Committee and CH Committee without a valid legal basis to do so, in violation of well settled New Jersey law.

### **III. Plaintiff is likely to Prevail on the Merits of its Claim.**

The essential facts of this matter cannot be disputed. Defendants are attempting to unilaterally fill the vacancies on the County Committee and CH Committee created by the tie vote amongst the 74 CCDC slate for the next highest vote total. In doing so, they are ignoring and violating the express requirements of N.J.S.A. 19:13-20(c), which

provides that “[w]henver a selection is to be made pursuant to this section to fill a vacancy resulting from inability to select a candidate because of a tie vote at a primary election for the general election, the selection shall be made from among those who have thus received the same number of votes at the primary.”

Defendants may point to the vacancy language in N.J.S.A §§ 19:5-2 and -3, which empower the members of the municipal committee to fill a vacancy, in support of their attempt to pack the committee with their friends. However, those statutes speak only to *who fills* the vacancy, not *whom can be selected to fill* the vacancy. As to that later question, when the vacancy arises from a tie vote, N.J.S.A. 19:13-20(c) controls. Consistent with N.J.S.A §§ 19:5-2 and -3, Defendants will get to choose who will fill the 71 vacancies. However, consistent with N.J.S.A. 19:13-20(c), when they do so, they must choose from among the 74 candidates who tied for the next highest vote total.

Defendants are also attempting to adopt a new constitution and bylaws for the CH Committee without having the required quorum of 22 members necessary to conduct business. Effectively, they are attempting to change the rules for the game before all of the players have even arrived at the table. The County Bylaws, which have historically been adopted by the CH Committee, are absolutely clear on the necessity of a quorum of members in order to conduct business. With no conflicting statutes, courts are obligated to defer to political parties on their internal operations, and to enforce the County Bylaws in this case. As noted above, Defendants will get to choose who fills the 71 vacancies from amongst the 74 tied candidates. With all 74 seats on the CH Committee then filled, a majority of those members can conduct business in the manner they deem appropriate.

Plaintiffs are therefore likely to prevail on the merits.

**IV. Plaintiffs Would Suffer Greater Harm in the Absence of an Injunction than Defendants would Suffer From its Imposition.**

The balance of the equities favors temporary restraints because Plaintiffs would suffer greater harm in the absence of such relief than Defendants would suffer from its imposition. It is undeniable that Defendants unilaterally attempted to fill the 71 vacancies on the CH Committee without regard to the fact that 3,255 voters made the 74 candidates running under the slogan “Camden County Democrat Committee, Inc.” the next highest vote getters for the remaining open seats. This is nothing less than an effort to steal the election.

It is likewise undeniable that Defendants are attempting to adopt a new constitution and bylaws for the CH Committee without a valid quorum for conducting business. This is nothing less than an effort to change the rules of the game before all of the players arrive at the table.

If the Court does not grant the injunctive relief as requested, the result will be a disenfranchisement of the 3,255 voters whose choices would be usurped by Defendants’ power grab. And 3 individuals imposing their will on the CH Committee before its 71 other members even have an opportunity to take their seats. CCDC would undeniably be harmed, as its membership, which is intended to be representative of the Democratic voters of Camden County, would be disproportionately skewed by three individuals. Conversely, Defendants will not be harmed by being enjoined from usurping the role of the voters and forced to await a valid quorum before conducting business. They would remain duly elected members of the CCDC and thereby members of the CH Committee. They would also remain empowered to fill the vacant seats resulting from the tie election. They would merely be constrained to filling those vacancies through the statutorily

mandated selection process established in N.J.S.A. 19:13-20(c). And to wait for their fellow members of the CH Committee to take their seats before obtaining the quorum necessary to conduct business.

### **CONCLUSION**

All four Crowe factors favor the imposition of temporary restrains and a preliminary injunction. Thus, for the reasons set forth above, Plaintiffs respectfully request that the Court grant its request for temporary restraints and enter a preliminary injunction preventing Defendants from conducting an organizational meeting of the Cherry Hill Democratic Committee, adopting bylaws for the Cherry Hill Democratic Committee, or attempting to fill the 71 open seats on the Cherry Hill Democratic Committee pending determination of Plaintiffs' claims for injunctive and declaratory relief on the merits.

Respectfully submitted,

**BROWN & CONNERY, LLP**  
Attorneys for Plaintiffs

Dated: June 23, 2025

/s/ William M. Tambussi  
William M. Tambussi, Esq.  
Michael J. Miles, Esq.  
William F. Cook, Esq.

# **APPENDIX I**

Cherry Hill Township  
Camden County

# OFFICIAL DEMOCRAT PRIMARY ELECTION BALLOT

June 10, 2025 • 6th Legislative District

*Pamela R. Lampitt*

**Pamela R. Lampitt**  
County Clerk  
Secretario del Condado

To protect your vote:  
IT IS AGAINST THE LAW FOR ANYONE  
EXCEPT YOU, THE VOTER, TO MARK OR  
INSPECT THIS BALLOT. However, a family  
member may assist you in doing so.

Para proteger su voto:  
ES LEGAL PARA CUALQUIERA OTRA PERSONA  
EXCEPTO USTED, EL VOTANTE,  
INSPECCIONAR ESTA PAPELETA. Sin embargo,  
un miembro de familia puede ayudarle a hacerlo.

PAPELETA OFICIAL DEMOCRATÁ ELECCION PRIMARIA

10 de junio del 2025 • 6to Distrito Legislativo

**A State Offices**  
Oficinas del Estado

**Governor**  
(Vote For One)  
Gobernador  
(Vote per Uno)

**A1** Sean Spiller   
Camden County Democrats Protecting Our Democracy

**A2** Steve Sweeney   
Camden County Democrat Committee, Inc.

**A3** Mikie Sherrill   
Navy Pilot, Mom, Democrat For NJ.

**A4** Steven Fulop   
Democrats for Change

**A5** Ras J. Baraka   
Reimagine NJ

**A6** Josh Gottheimer   
Democrats of Camden County

Write-in   
Per Escrito

**B Members of the General Assembly**  
(Vote For Two)  
Miembros de la Asamblea General  
(Vote per Dos)

**B1** Rebecca Holloway   
Democrats for Change

**B2** Kevin Ryan   
Democrats for Change

**B3** Louis D. Greenwald   
Camden County Democrat Committee, Inc.

**B4** Melinda Kane   
Camden County Democrat Committee, Inc.

Write-in   
Per Escrito

Write-in   
Per Escrito

**C County Offices**  
Oficinas del Condado

**Surrogate**  
(Vote For One)  
Surrogate  
(Vote per Uno)

**C1** Michelle Gentek-Mayer   
Camden County Democrat Committee, Inc.

Write-in   
Per Escrito

**D Member of the Board of County Commissioners - Unexpired Term**  
(Vote For One)  
Miembros de la Junta de Comisionados del Condado - Término No Vencido  
(Vote per Uno)

**D1** Jennifer Fleisher   
Camden County Democrat Committee, Inc.

Write-in   
Per Escrito

**E Members of the Board of County Commissioners**  
(Vote For Two)  
Miembros de la Junta de Comisionados del Condado  
(Vote per Dos)

**E1** Edward T. McDonnell   
Camden County Democrat Committee, Inc.

**E2** Colleen Bianco Bezich   
Camden County Democrat Committee, Inc.

Write-in   
Per Escrito

Write-in   
Per Escrito

**F Municipal Offices**  
Oficinas Municipales

**Members of Council**  
(Vote For Four)  
Miembros del Concilio Municipal  
(Vote per Cuatro)

**F1** William A. Carter, III   
Camden County Democrat Committee, Inc.

**F2** Sangeeta Doshi   
Camden County Democrat Committee, Inc.

**F3** Jill Hulnick   
Camden County Democrat Committee, Inc.

**F4** Rob Connor   
Camden County Democrat Committee, Inc.

Write-in   
Per Escrito

Write-in   
Per Escrito

Write-in   
Per Escrito

Write-in   
Per Escrito

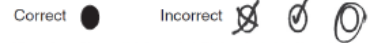
**G Members of County Committee**  
(Vote for One)  
Miembros del Comité del Condado  
(Vote per Uno)

**G1** South Jersey Progressive Democrats   
Susan Druckenbrod  
David Stabi  
Rena Margulis

**G2** Camden County Democrat Committee, Inc.

Jennifer Agall	Alan B. Braslow
Rosy Arroyo	William A. Carter, III
Kira Bauerle	Scott Stearn
Jade M. Bechell	Ryan Doran
Janet M. Chow	Gerald Faber
Jessica Curro	Lewis R. Friedman
Lauren Doran	Kenneth R. Gollin
Mahveen Durran	Gerald S. Greene
Mary Ekstratades	Mark P. Haltzman
Kate Bauerle	Moly K. Hung
Jennifer Fleisher	Qasim Hussain
Morgan Bauerle	Brad Israelsky
Danna T. Goldhaber	Jay Jones
Cynthia D. Gowdy	Theodore S. Kall
Maryl L. Greene	Samuel Kates
Sheila M. Griffith	Charles F. Lampitt
Mary E. Gunn	Michael A. Lieberman
Faith Hamilton	John J. Mulholland, Jr.
Roberta S. Israelsky	Naoivin Norman
Marlyn D. Kallan	David J. Okin
Helene Katz	Jim Peeler, Jr.
Iselle M. Lampitt	Jonathan Rardin
Ann M. Madden Tufano	David Rardin
Lorraine Maitland	Anargiros Rentezas
Debra Noll	Bruce S. Schwartz
Melanie Gaffin	Marshall Spevak
Bridget Palmer	Bruce T. Tretloway, Jr.
Anna Probstoff	Samuel J. Waltzer
Jill Roth-Gutman	Michael J. Watson
Ivy B. Rovner	Danny S. Wolf
Suzanne Winderman	Jim Lyons
Jade Arroyo	Miguel Manzano
Kerry Cleary	Rob Connor
Melissa Manzano	Dan DiRenzo, Jr.
Michele Golkow	Jon Cohen
Sangeeta Doshi	Zane Roskoph
Jill Hulnick	Kevin Cockfield

**INSTRUCTIONS TO VOTERS**  
Use ONLY a black or blue ink pen to mark your ballot.  
This ballot will be read by a machine. For your vote to count, fill in oval completely.



1. To vote for candidates on this ballot, completely fill in the oval to the right of the candidate for each selection. Do not vote for more candidates than are to be elected to any office.  
2. To vote for any person whose name is not printed on the ballot, write the name of such person opposite the proper title or office in the column designated Write-In and fill in the oval on right of this area. Do NOT use pre-printed stickers. IF NOT DONE PROPERLY YOUR WRITE-IN VOTE WILL BE VOID AND NOT COUNTED.  
3. Do not mark this ballot in any other manner than above provided for and make no erasures. If this ballot is torn, soiled, defaced or incorrectly marked, return it and obtain another.

**INSTRUCCIONES PARA LOS VOTANTES**  
Usar solo un bolígrafo de tinta negra o azul para marcar su papaleta.  
Esta papaleta será leída por la maquina. Para que su voto cuente llene el círculo.



1. Para votar por los candidatos en esta papaleta, llene completamente el óvalo de la derecha del candidato para cada selección. No vote por más candidatos que los que van a ser elegidos para ese cargo.  
2. Para votar por cualquier persona que nombre no este en la papaleta, escriba el nombre de esa persona opuesto a la posición apropiada, en la columna designada como Por Escrito y llene el óvalo a la derecha de esta área. NO use papeletas pre-impresas. Si no se hace esto correctamente su voto por esta persona será nulo y no contará. POR FAVOR PRESUNTIVAMENTE SI TIENE ALGUNA DUDA.  
3. No marque esta papaleta de ninguna otra forma que no sea de la manera que se ha descrito en la parte superior y no haga ninguna tachadura o borrones. Si la papaleta se le ha dañado, está sucia, borrada o marcada incorrectamente, devuélvala y obtenga otra.

**DEM ED/EV Cherry Hill**

**BROWN & CONNERY, LLP**

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(856) 854-8900

Attorneys for Plaintiffs

CAMDEN COUNTY DEMOCRATIC  
COMMITTEE, INC. and JAMES BEACH,

Plaintiffs,

vs.

SUSAN DRUCKENBROD, DAVE STAHL, and  
RENA MARGULIS,

Defendants.

**SUPERIOR COURT OF NEW JERSEY**  
LAW DIVISION, CIVIL PART  
CAMDEN COUNTY

Docket No.:

Civil Action

**Notice of Motion  
for Preliminary Injunction**

**PLEASE TAKE NOTICE** that Plaintiffs, Camden County Democratic Committee, Inc. (“CCDC”) and James Beach (collectively, “Plaintiffs”), through their counsel Brown & Connery, LLP, will move before the Superior Court of New Jersey, Law Division, Civil Part, Camden County, as soon as counsel may be heard, for a preliminary injunction.

Pursuant to R. 1:6-3(a), Plaintiffs shall rely on the Verified Complaint and Brief in Support of its Motion for Preliminary Injunction.

In accordance with R. 1:6-2(a) and R. 4:42-1(e), an original and one copy of a proposed form of order, as well as a proposed order to show cause are submitted herewith.

Pursuant to R. 1:6-2(d), oral argument is requested if opposition is filed.

Respectfully submitted,  
**BROWN & CONNERY LLP**  
*Attorneys for Plaintiffs*

*/s/ William M. Tambussi*

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William F. Cook, Esq.  
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Post Office Box 539  
Westmont, NJ 08108  
(856) 854-8900

Dated: June 23, 2025

# Civil Case Information Statement

## Case Details: CAMDEN | Civil Part Docket# L-002089-25

**Case Caption:** CAMDEN COUNTY DEMOCRATIC COMM  
VS DRUCKENBROD SU

**Case Initiation Date:** 06/23/2025

**Attorney Name:** WILLIAM M TAMBUSSI

**Firm Name:** BROWN & CONNERY, LLP

**Address:** 360 HADDON AVE

WESTMONT NJ 08108

**Phone:** 8568548900

**Name of Party:** PLAINTIFF : CAMDEN COUNTY  
DEMOCRATIC COMM

**Name of Defendant's Primary Insurance Company**  
(if known): None

**Case Type:** ELECTION LAW

**Document Type:** Verified Complaint

**Jury Demand:** NONE

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same  
transaction or occurrence)?** NO

**Does this case involve claims related to COVID-19?** NO

**Are sexual abuse claims alleged by: CAMDEN COUNTY  
DEMOCRATIC COMM?** NO

**Are sexual abuse claims alleged by: JAMES BEACH?** NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual  
management or accelerated disposition:**

Case filed on an emergent basis requesting temporary restraints.

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO  
**Medical Debt Claim?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

06/23/2025  
Dated

/s/ WILLIAM M TAMBUSI  
Signed