



State of New Jersey

DEPARTMENT OF COMMUNITY AFFAIRS

101 SOUTH BROAD STREET

PO BOX 803

TRENTON, NJ 08625-0803

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

CHARLES A. RICHMAN
Commissioner

November 13, 2017

Ravinder S. Bhalla, Councilman
City of Hoboken
837 Garden Street
Hoboken, New Jersey 07030

Re: Local Government Ethics Law
Complaint #LFB-10-011
NOTICE OF VIOLATION

Dear Councilman Bhalla:

The Local Finance Board (Board) issued a **NOTICE OF VIOLATION** regarding its findings in the matter of Complaint #LFB-10-011 against you. Enclosed is the **NOTICE** issued by the Board.

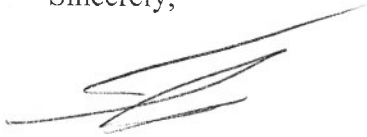
Please be advised that the **NOTICE** is not a final determination if you desire to avail yourself of the right to request an administrative hearing. If a hearing is requested in accordance with the enclosed **NOTICE**, the Board will not issue a final decision until the completion of the administrative hearing process.

Please also be advised that while sharing office space with a professional appointed by City Council is not and of itself a "substantial conflict with the proper discharge of duties in the public interest," co-signing a lease agreement is considered a shared business relationship and would appear to constitute a direct/indirect financial involvement that might reasonably be expected to impair one's objectivity or independence of judgment. Please be further advised that the Board's intent is not to set a precedent that office space cannot be shared between two professionals, but rather to distinguish between sharing office space and being jointly and severally bound in a lease agreement which constitutes a financial involvement. Therefore, the Board determined that you should have abstained from Council involvement/action in the appointment of Paul Condon, Esq.



If you have any questions regarding the matter, please contact Dina Venero at (609) 633-6349. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Timothy J. Cunningham', written over a horizontal line.

Timothy J. Cunningham, Chair
Local Finance Board

Enclosure: C10-011 NOV
TJC:dv



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STATE OF NEW JERSEY
LOCAL FINANCE BOARD
NOTICE OF VIOLATION

In Re: [Ravinder S. Bhalla, Councilman, City of Hoboken, Complaint #10-011]

This matter having come before the Local Finance Board (Board) pursuant to the Local Government Ethics Law, N.J.S.A. 40A:9-22.1 et seq., upon complaint that Councilman Ravinder S. Bhalla voted yes on a resolution appointing special legal counsel for the City and authorizing a contract to Paul Condon, Esq. for legal services to the City, while Councilman Bhalla had a close business relationship with Mr. Condon, in violation of N.J.S.A. 40A:9-22.5.d: and,

WHEREAS, it was determined that the allegations were within the Board's jurisdiction, were not frivolous and were based upon a reasonable factual basis, the Board authorized an investigation of this complaint; and

WHEREAS, the Local Government Ethics Law states:

N.J.S.A. 40A: 9-22.5.d. No local government officer or employee shall act in his official capacity in any matter where he, a member of his immediate family, or a business organization in which he has an interest, has a direct or indirect financial or personal involvement that might reasonably be expected to impair his objectivity or independence of judgment:

WHEREAS, the Board, having considered the matter and the relevant statements and information presented in the written response to the allegations submitted by Councilman Bhalla, concluded that voting in favor of a resolution providing for the continued legal services of Paul Condon, Esq. while he has a shared lease agreement with Mr. Condon constitutes a direct or indirect financial or personal involvement that might reasonably be expected to impair his objectivity or independence of judgment, in violation of N.J.S.A. 40A:9-22.5.d.

It is therefore,

DETERMINED that Hoboken City Councilman Ravinder S. Bhalla shall be assessed a fine in the amount of \$100.00 for the violation as related to his engaging in activities prohibited by statute. Payment of said fine shall be waived.



NOTICE that Councilman Bhalla is entitled to an administrative hearing in accordance with N.J.S.A. 40A:9-22.12 to contest this **NOTICE**. Any request for an administrative hearing shall be filed with the Local Finance Board within 30 days of receipt of this **NOTICE**. If an administrative hearing is requested, the Board will not issue a final decision until the completion of the administrative hearing process. Said hearing request shall be filed with Patricia Parkin McNamara, Executive Secretary, Local Finance Board, Department of Community Affairs, P.O. Box 803, Trenton, New Jersey 08625.



TIMOTHY J. CUNNINGHAM, CHAIR
LOCAL FINANCE BOARD