

COMPLAINT-CRIMINAL CHARGES

2C:33-4(c) Harassment

1. Christine Dansereau falsely accused me of violating the law on several occasions, including falsely accusing me of illegally operating a restaurant on the premises of my business. On or about November 6, 2019, Christine Dansereau directed Borough of Roselle Officials and employees, including, the Health Officer, Director of Code Enforcement, Code Enforcement Officers and the Construction Official to target me and ordered them to conduct an unwarranted inspection of my place of business and issue summonses for violations based on her false allegations. On four prior occasions in 2018, Christine Dansereau also ordered code enforcement officials to target me and ordered them to issue violations based on her false allegations that I was engaging in unlawful behavior in the operation of my business by not getting proper permits and zoning board approval for work she alleged was being performed on the premises. None of the inspections conducted by Borough Officials and Employees ever resulted in any violations. The purpose of Christine Dansereau's actions and course of conduct was to alarm, seriously annoy and intimidate me because I refused to support her candidacy as Mayor and publicly opposed her actions and behavior in office which I deemed to be unethical and illegal.

2. In or about July of 2019, Christine Dansereau unlawfully hired an outside counsel attorney to investigate me in order to alarm, seriously annoy and intimidate me because I refused to support her candidacy as Mayor and publicly opposed her actions and behavior in office which I deemed to be unethical and illegal.

2C:27-12- Crime of Corruption of Public Resources

By making false allegations against me and directing Borough Officials and Employees to target me and issue violations that were unwarranted, Christine Dansereau knowingly used public resources for the unauthorized purpose of harassing me. In addition, Christine Dansereau used public monies to illegally hire an outside counsel attorney to investigate me for the purpose of harassing and intimidating me because I refused to support her candidacy as Mayor and publicly opposed her actions and behavior in office which I deemed to be unethical and illegal.

2C:27-5 Retaliation for Past Official Action

Christine Dansereau harassed me and caused harm to my business, professional reputation as well as emotional distress for the purpose of retaliating against me for the actions that I took in my capacity as a Councilperson and public servant. In carrying out my duties as a Councilperson to protect the interests of our residents, I publicly questioned many of the Mayor's actions and pointed out behavior which I believed constituted fraud, waste and abuse and deemed to be unethical and illegal. As a result, the Mayor engaged in harassment in order to retaliate against me by making false allegations and ordering Borough of Roselle Officials and employees, including, the Health Officer, Director of Code Enforcement, Code Enforcement Officers and the Construction Official to target me and issue violations.

In addition, as a result of my actions in my official capacity, Christine Dansereau also engaged in harassment in order to retaliate against me by unlawfully hiring an outside counsel attorney to investigate me.

Moreover, Christine Dansereau harassed me and caused me financial harm for the purpose of retaliating against me by ordering the Borough Administrator to take funding away to pay for my attendance at the League of Municipalities conference and for hotel accommodations which are benefits that have always been afforded to all sitting councilmembers.

2C:28-4 (b)-False Reports to Law Enforcement Authorities

Christine Dansereau filed a fictitious report by reporting false information to Borough Officials, including the Director of Code Enforcement, the Construction Official and the Health Officer, accusing me of illegally operating a restaurant at my business and engaging in unlawful behavior on several occasions in the operation of my business knowing that she had no firsthand knowledge of any of the incidents or information she reported.

2C:30-6. Crime of official deprivation of civil rights

Christine Dansereau in her official capacity as Mayor purposely engaged in unlawful harassment and retaliation in order to intimidate and discriminate against me because of my race. On several occasions, I publicly voiced opposition to her illegal discriminatory practices in the treatment of me and other African-American professionals of the Borough of Roselle. She has interfered with and deprived me of my ability to perform my lawful duties as a councilperson by oftentimes refusing to allow me the right to speak during council meetings, denying me information to which I am entitled and publicly treating me in a condescending and demeaning manner. She also deprived me of my equal rights by ordering the Business Administrator to take away

funding to pay for me to attend the League of Municipalities conference and for hotel accommodations which have always been afforded to all sitting council people. All the while, she allows Caucasian councilmembers to speak at will, engage in abusive behavior toward our African-American professionals and aids and abets them in acting outside of the scope of their authority by interfering with the day-to-day operations of the Borough.

In addition, Christine Dansereau's unlawful actions in ordering Borough Officials and employees to target me, investigate me and inspect my business premises in order to intimidate and discriminate against me because of my race has subjected me to unwarranted and unreasonable searches and seizures and invasion of privacy in violation of my civil and constitutional rights.