

INVESTIGATION REPORT

Re: Lieutenant Governor

Dr. Dale G. Caldwell

LOWENSTEIN SANDLER LLP

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I. Executive Summary

The Chief Ethics Officer to the Office of the Governor of New Jersey (“Chief Ethics Officer”) engaged Lowenstein Sandler LLP (“Lowenstein,” “us,” or “we”) to investigate allegations against Lieutenant Governor Dr. Dale G. Caldwell (“LG”), initiated by an anonymous letter dated May 6, 2026, and received by the Chief Ethics Officer on May 14, 2026 (“Anonymous Complaint”). The LG received formal notice of this investigation on May 22, 2026. This report summarizes our findings in two areas: (1) whether the LG violated the New Jersey State Policy Prohibiting Discrimination in the Workplace (“Workplace Policy”); and (2) whether the LG violated the Code of Conduct for the Governor, which applies to the Lieutenant Governor and was adopted as Appendix A to Governor Sherrill’s Executive Order No. 3 (“Code of Conduct”), and/or the Uniform Ethics Code, adopted by the State Ethics Commission pursuant to N.J.S.A. 52:13D-23 (“Uniform Ethics Code”).

A violation of the Workplace Policy is substantiated. Credible evidence shows that the LG made a romantic advance toward a female staffer’s friend. After his advance was rebuffed, the LG told the staffer, in reference to her and her friend, that “you young women are looking for young sperm.” The LG’s comment, sexual in nature, caused the staffer to change the way she interacted with the LG at work, to attempt to distance herself from him, and to avoid travel with him when possible. We find that the LG’s conduct, as set forth in greater detail below, constituted sexual harassment, and was derogatory or demeaning in

reference to the staffer's sex, which is a protected category. The LG denied making this comment, but we did not find his denial credible.

Two violations of state ethics rules are also substantiated. First, credible evidence shows that the LG brought personal guests to ticketed events without advance ethics clearance and without payment or reimbursement.¹ The LG continued this practice after receiving formal and informal guidance on the applicable ethics rules, including the following workplace conduct and ethics trainings that the LG has received since taking office:

Approximate Date (2026)	Training Type
January	Standard training session
February 9	Formal training regarding compliance with Code of Conduct and Uniform Ethics Code
February 25	Discussion with Staffer-1 about ethics rules related to guests at events
February 27	Formal training on workplace conduct and the Workplace Policy
April	Discussion with Staffer-1 about ethics rules related to guests at events
May 1	Formal training regarding compliance with Code of Conduct and Uniform Ethics Code

The Code of Conduct and Uniform Ethics Code provide strict parameters under which the LG may attend events without compensation, and specify that he cannot accept, directly or indirectly, things of value except under certain narrow circumstances. Where a

¹ After receiving notice of this investigation, the LG provided reimbursement for a guest's attendance at a single event.

sponsor waives admission to an event for an official's family member, friend, or date, the value of that admission is an impermissible benefit to the official.

Second, credible evidence shows that the LG attempted on multiple occasions to secure a promotion for a state employee with whom he had a romantic relationship. Using his state email account, on May 26, 2026—less than one month after being admonished and trained with regard to workplace conduct and ethics matters, and four days after the Chief Ethics Officer formally notified him of this investigation—the LG reached out to an official in another executive branch department and suggested that the state employee receive a promotion. This email followed the LG's verbal request to a different official in that department the week before, in which the LG advocated for the same promotion. The LG admitted to investigators that he did not disclose the romantic nature of his relationship with the state employee while making these promotion requests.

The Uniform Ethics Code expressly forbids a state officer or employee from involving himself in his official capacity in any matter that pertains to or involves an individual with whom he has a dating relationship. Here, the LG sought a promotion for his romantic partner, a state employee. The facts substantiate a violation of the Uniform Ethics Code, as well as a related section of the Code of Conduct.

Part II of the report discusses the methodology used in this review. Part III summarizes the factual positions asserted in the Anonymous Complaint and by the LG in response. Part IV summarizes the facts developed in the investigation. Part V contains our analysis and findings. Part VI summarizes our conclusions.

II. Methodology

Lowenstein gathered facts and analyzed evidence under relevant law and state policy with regard to the period of time during which the LG has been employed by the State of New Jersey. In addition, we provide guidance to the Chief Ethics Officer as to whether allegations against the LG are substantiated.

Determining whether an allegation is “substantiated” is a two-step inquiry under the model procedures for internal complaints alleging discrimination in the workplace, N.J.A.C. 4A:7-3.2, and we apply the same process to the ethics investigation. The first step is a factual inquiry: an investigation is conducted to determine, based on the credible evidence developed, whether the alleged conduct occurred by a preponderance of the evidence. In the second step, the established facts are analyzed against the governing legal standard(s). An allegation is substantiated only if the credible evidence establishes that the conduct occurred, and that conduct violates state law or policy.

Lowenstein interviewed numerous witnesses, including the LG,² and collected pertinent documents and other materials in the course of its review. The Governor’s Office cooperated fully with the investigation in all respects and provided us with unfettered access to the witnesses and information we requested.

The identities of witnesses have been anonymized to the extent possible in order to respect the privacy of persons involved. (*See Workplace Policy § VI.*) State law requires

² Before the start of the LG’s interview, the LG was asked whether he had retained counsel in connection with this matter and he stated that he had not. Investigators offered to postpone the interview if the LG wanted to retain counsel and he declined.

confidentiality of complaints and investigations throughout the investigative process to the extent practical and appropriate under the circumstances. Specifically, N.J.A.C. 4A:7-3.1(j) states: “[a]ll complaints and investigations shall be handled, to the extent possible, in a manner that will protect the privacy interests of those involved. To the extent practical and appropriate under the circumstances, confidentiality shall be maintained throughout the investigative process. In the course of an investigation, it may be necessary to discuss the claims with the person(s) against whom the complaint was filed and other persons who may have relevant knowledge or who have a legitimate need to know about the matter.” N.J.A.C. 4A:7-3.1(g)(4) also provides that “[w]ritten records, consisting of the investigative report and any attachments, including witness statements, shall be maintained as confidential records to the extent practicable and appropriate and will remain so indefinitely.” Despite the fact that the existence of this investigation was reported on by the media and placed into the public record prior to completion of the investigation, we continue to use pseudonyms rather than names in order to protect the privacy of witnesses to the extent practicable.

The following individuals are referenced in this report by pseudonym:

Witness	Description
The LG	Lieutenant Governor Dr. Dale G. Caldwell
Staffer-1	Senior staffer in the LG’s office
Staffer-2	Staffer in the LG’s office
Staffer-3	Senior staffer in the Department of State

Witness	Description
Staffer-4	Staffer in the Governor's Office
Staffer-5	Staffer in the Department of State
Staffer-6	Official in the Department of State
Staffer-7	Senior Advisor to the LG
Individual-1	The LG's romantic partner
Individual-2	Friend of the LG, not employed by the State
Advisor-1	Strategic advisor, not employed by the State
Advisor-2	Strategic advisor, not employed by the State
Attorney-1	New Jersey attorney, not employed by the State
Official-1	Official in a New Jersey executive branch department
Official-2	Senior official in a New Jersey executive branch department
Official-3	High-ranking official in a New Jersey executive branch department
Trooper-1	New Jersey state trooper assigned to the LG's security detail

In investigating and evaluating these allegations, we were guided, as applicable, by the principles and procedures set forth in, *inter alia*, the Workplace Policy, Code of Conduct, and Uniform Ethics Code.

III. Factual Assertions

A. Summary of the Anonymous Complaint

The Anonymous Complaint was addressed to the Executive Director of the State Ethics Commission, the Office of the Attorney General of New Jersey, the Director of the Division of EEO/AA at the New Jersey Civil Service Commission, and a reporter from the

New York Times.³ A copy of the Anonymous Complaint is attached as **Exhibit 1**. Its allegations are summarized below.

1. Guests at Ticketed Events

The anonymous complainant begins by alleging that “[t]he NJ Lieutenant Governor, Dale Caldwell, has been bringing uninvited female guests to events while traveling using taxpayer funds.” The complainant alleges that “[t]hese guests did not have paid tickets to any of the events,” but “they were admitted for free because he is the Lieutenant Governor and no one wants to tell him, ‘no’.” The complainant states that the LG “should not be accepting free tickets to costly events for the women he is trying to impress,” and requests that the recipients “[p]lease put a stop to this shameless and corrupt behavior.”

2. Improper Behavior Toward Women

The anonymous complainant alleges that the LG “is also hitting on women at functions while traveling using taxpayer money,” and “handing out his state business cards and asking women out on dates.” The complainant claims that “the power imbalance between [the LG] and these women is coercive.”

B. The LG’s Written Response to the Anonymous Complaint

On May 22, 2026, the Chief Ethics Officer formally notified the LG that her office had commenced this investigation. A copy of the Chief Ethics Officer’s May 22, 2026, notification letter is attached as **Exhibit 2**. The Chief Ethics Officer informed the LG that she had received a complaint “alleging certain workplace misconduct and ethics

³ It is unclear whether all addressees received a copy of the Anonymous Complaint.

violations,” and that the Chief Ethics Officer had retained Lowenstein to investigate the allegations. The Chief Ethics Officer subsequently forwarded the LG a copy of the Anonymous Complaint.

The LG responded to the Chief Ethics Officer via letter dated May 28, 2026, denying any wrongdoing. A copy of the LG’s May 28, 2026, response to the Chief Ethics Officer’s notification letter is attached as **Exhibit 3**. The LG stated that the accusations are false and misleading, and that he welcomed a review of the allegations because he was confident the facts would exonerate him.

The LG stated that he has never asked anyone on a date, “hit on,” or romantically pursued anyone while conducting official business. He denied distributing business cards to women for inappropriate reasons, noting that he has given his card to more men than women, and usually provides the contact information of his Senior Advisor, Staffer-7, instead of his own. The LG also addressed two events referenced in the Anonymous Complaint. He explained that his daughter attended the Rowan University Rosa Parks Scholarship Luncheon on February 24, 2026, as his guest, and that Individual-2 attended events on April 18, 2026, because of her professional expertise in artificial intelligence (“AI”), social media, and technology. The LG further stated that he has known Individual-2 professionally for more than a decade, that he has never dated her, and that she voluntarily produced content in the form of an AI-generated video of George Washington crossing the Delaware River.

The LG characterized the Anonymous Complaint as driven by misinformation, racial prejudice, false assumptions, and an alleged personal vendetta. He committed to cooperating fully with any review process and reaffirmed his commitment to serving New Jersey with integrity, dignity, professionalism, and transparency.

IV. Summary of the Factual Investigation

This section summarizes the relevant investigative facts.⁴

A. Background on the LG's Dual Role

The LG holds two positions simultaneously: Lieutenant Governor and Secretary of State. Because of that dual role, our review considered the LG's alleged conduct in both official capacities. Each role carries its own staff. A front office, led by its chief of staff, supports the LG in his role as Lieutenant Governor. As Secretary of State, the LG is supported by a separate team, led by its own chief of staff and two deputies, two assistant secretaries of state, and a legislative affairs team. The two offices share a single calendar so that all of the LG's events appear in one place.

⁴ During the course of our investigation, certain witnesses made allegations that were not specifically identified in the Anonymous Complaint. When a new allegation was made that implicated the Workplace Policy and/or ethics rules, we investigated that allegation as well.

An attorney affiliated with the Sherrill gubernatorial campaign disclosed an issue related to the LG's previous employment involving a dispute with another employee. Though the issue predated the LG's state service and is therefore outside the scope of this review, the attorney reported that the matter was reviewed by the campaign, and it was determined that no findings were made against the LG by the prior employer with regard to this issue.

B. Workplace Conduct Allegations

This section summarizes the facts pertinent to the allegations concerning improper behavior toward women, as was alleged in the Anonymous Complaint.

We note at the outset that in addition to receiving standard training in January 2026, the LG received training on February 27, 2026, concerning appropriate workplace conduct, including the Workplace Policy. In addition to those training sessions, the LG was specifically put on notice of concerns about his conduct toward women on multiple occasions, and at times directly admonished for it, before this investigation began. For example, during the week of March 16, 2026, a senior official in the Governor's Office called Advisor-1 and reported that multiple sources had raised concerns about the LG's conduct toward women. On March 25, 2026, Advisor-1 called the LG at the senior official's request. Advisor-1 told the LG that he heard from several reliable sources that there was a concerning pattern regarding the LG's approaches to women, and that the behavior was problematic. Additionally, immediately following a May 1, 2026, ethics training, senior officials met privately with the LG and told him that they were concerned about his behavior related to women. The LG told investigators that these officials warned him, in substance, to be careful because people are watching everything that he does.

The LG's Conduct at Official Events

Witnesses were asked whether the LG made advances toward women at official events, including by handing out his state business cards, as alleged in the Anonymous Complaint.

Staffer-1 described the LG as prone to lingering at events when an attractive woman was present. Staffer-1 further reported that a high-level person joked with her that the LG used politics as a personal dating tool. Additionally, as set forth below, Staffer-1 described an incident at an official event at the [REDACTED] where the LG made a romantic advance toward one of her personal friends. Staffer-3 said that she had heard that respected members of the public were making insinuations regarding the LG's interest in pursuing women, and that his team repeatedly cautioned him about his behavior at official events.

Staffer-5 was unaware of any advances or date requests made by the LG, but noted that the LG typically wants to stay at events and network, and that the LG shares her (Staffer-5's) phone number rather than his own with people he meets. Staffer-7 denied observing the LG make any romantic advances despite being with the LG daily, denied that anyone had raised concerns to him, and rejected the suggestion that the LG was using his state business cards to solicit women.

Official-1 said that he had heard that the LG might be flirtatious but recalled no specifics, and several others, including Staffer-3, Staffer-6, and Trooper-1, stated that they had not personally observed the LG propositioning women or behaving inappropriately at events. Individual-2 said, "not Dale, no," when asked whether she had witnessed the LG make advances toward women, but she said that he likely would not do that in front of her.

Allegation Regarding a Text Message with a Governor's Office Employee

During Lowenstein's review, investigators learned of a rumored text message from the LG to a female Governor's Office employee.

Specifically, Staffer-1 and Staffer-3 said they had heard about a potentially inappropriate text message that involved the LG. Attorney-1, who said that he was also told about the alleged text message, heard it was sent to a female employee of the Governor's Office by the LG, and that it may have been intended to facilitate a relationship. However, Staffer-1, Staffer-3, and Attorney-1 had never seen the text message and did not know the identity of the recipient. Advisor-2, who was identified as someone familiar with the text message, denied any knowledge of it. The LG denied ever asking out a staffer or texting a female employee of his office or the Governor's Office about going on a date. We were unable to identify the recipient of the text message or obtain a copy of it.

Because we were not able to identify credible evidence regarding either the existence or contents of this alleged text message, and the alleged recipient has not raised any concerns about this issue, it plays no role in our analysis.

Finding a "First Lady"

Several witnesses said they heard that the LG was looking for a "first lady," purportedly in connection with a potential future candidacy for Governor. Staffer-1 gave the most direct account. She said that the LG tasked her with finding him a "first lady," that she told him no, and that he was "pushy" on the subject. Staffer-4 said the subject of finding a "first lady" arose in political terms. Staffer-4 also said he did not take the LG's words about finding him a romantic partner as literally as Staffer-1 did, but understood the "first lady" reference to mean that the LG wanted a wife.

Two witnesses said they heard the “first lady” remark but also said they were never asked for such help: Staffer-2 heard the LG say he needed a first lady but was never personally asked to make an introduction; Staffer-6 could not recall the precise words, but described the LG telling her, alone in her office, that if he ran for Governor he would need a first lady, so if she came across someone suitable she should let the LG know. Two other witnesses reported nothing of the kind: Staffer-7, who was with the LG nearly every day from the campaign forward, denied ever hearing him say he needed a first lady or ask staff to find him dates; Trooper-1 had never heard of the LG using staff to find romantic prospects.

The LG admitted telling staff that he wanted to find a “first lady,” but said he was not serious and noted that others in the office joked in similar ways. He said he would stop doing it if someone found it inappropriate, but no one ever told him that he made them feel uncomfortable.

and Subsequent Incident in

Staffer-1 described an incident at an official event at the where the LG made a romantic advance toward one of her personal friends, who accompanied Staffer-1 to the event. Staffer-1’s friend does not work in state government.

Staffer-1 stated that during the event, she observed the LG ask her friend what she did for a living and how she “built her confidence,” which Staffer-1 perceived as the LG’s way of flirting. Staffer-1 said that she briefly stepped away at one point during the event. According to Staffer-1, her friend later asked her whether the LG was single, because when

Staffer-1 stepped away, the LG had hit on her (Staffer-1's friend) and asked whether she wanted to go dancing with him. Staffer-1 said she cringed at the invitation to her friend, who is much younger than the LG, and was embarrassed by it. Official-1 recalled Staffer-1 telling him about this incident soon after it occurred. According to Staffer-1, the LG thereafter occasionally asked Staffer-1 about her friend, how she was doing, and whether she was single.

According to Staffer-1, on April [REDACTED] 2026, during a [REDACTED] [REDACTED] [REDACTED] in [REDACTED], Staffer-1 was riding in the back seat with the LG, behind Trooper-1, who was driving. No one else was present. During that drive, the LG allegedly asked whether Staffer-1's friend was still single. Staffer-1 replied that her friend was not interested in a romantic relationship with the LG. Upon being rebuffed, the LG remarked that Staffer-1, her friend, and women like them were ambitious and successful and needed a man who was in a position to help them, "but you young women are looking for young sperm."

Staffer-1 reported making eye contact with Trooper-1 in the rearview mirror, changing the subject, and photographing a nearby statue to time stamp the incident. Investigators reviewed the photograph Staffer-1 took in [REDACTED], including its metadata memorializing the date, time, and location. A copy of the photograph and its metadata is attached as **Exhibit 4**. Staffer-1 said that after this incident she changed the way she interacted with the LG at work and attempted to distance herself from him. For example, Staffer-1 said that since [REDACTED], she has "been cognizant not to put [her]self in that

situation” again, and has avoided travel with the LG when possible. According to Staffer-2, Staffer-1 told her about an incident in [REDACTED] that Staffer-1 described to her as “textbook sexual harassment,” without further detail. Trooper-1 said he did not hear any such conversation or any of the circumstances described by Staffer-1 in [REDACTED], but that when driving he attends to safety, navigation, and radio updates from the other troopers on the detail, and is not attuned to conversations in the back seat.

When asked about these events, the LG acknowledged that he met Staffer-1’s friend at an event at the [REDACTED]. He said he asked whether she was single, acknowledged telling Staffer-1 that her friend was very attractive, and admitted that he asked for her friend’s phone number, but denied actually asking her out on a date. The LG denied making the “young sperm” remark, including as a joke, and said he had no recollection of raising the subject of Staffer-1’s friend while in the car as Staffer-1 described.

“Executive Presence”

Witnesses described a number of additional comments the LG made in their presence that were perceived by some to be about women’s appearance. Staffer-1 recounted that the LG repeatedly emphasized that his team needed to have “executive presence.” Staffer-1 said that she believed that whenever the LG talked about physical attractiveness in the workplace, he called it “executive presence.” She stated that the LG showed her an example of executive presence by tossing her a [REDACTED] featured another female staffer, whom the LG described to other witnesses as physically

attractive, and indicating that the staffer on the [REDACTED] had executive presence, which is what he wanted from his team. Staffer-1 also said she recommended a male friend as a senior aide to the LG who was well qualified for the role, but the LG rejected him, saying the friend did not have executive presence and did not look like he likes to run, which Staffer-1 interpreted to be a comment on her friend's weight.

Staffer-4 confirmed the LG's use of the phrase, although he said that it is not specifically about just women. Staffer-4 described the phrase as intended to refer to people who have a command of the room, "like standing up straight," and as "old school corporate lingo," not necessarily about physical appearance. But Staffer-4 also explained that "looking the part" is part of it.

Staffer-3 said she had not heard the term "executive presence," but that the LG has particular "expectations for presence." Staffer-3 also recounted comments the LG made about Staffer-6, including that Staffer-6 "is a brand master, wait until you see her," as well as comments that Staffer-6 was "looking the part," was "able to look the part," and "can represent [him] as LG." Staffer-3 interpreted those comments as based on Staffer-6's physical appearance, and said she found it concerning and that "it didn't sit well." Staffer-3 said she thereafter became attentive to the LG's interactions with Staffer-6 and tried to make organizational adjustments so that Staffer-6's responsibilities did not involve daily interactions with the LG.

Staffer-6 said she had not heard the LG use the phrase "executive presence," although she noted that when he recruited her, he mentioned her academic qualifications

and referred to her presence, saying that he was interested in her serving as his proxy. Staffer-6 acknowledged hearing the LG say that he likes to be surrounded by people who make him look good, but said it did not seem to her that he meant it in terms of physical appearance. Instead, Staffer-6 understood that the LG wanted well-educated people with experience who genuinely want to make an impact on New Jersey. She was not aware of the LG making any comments about any staff member's physical appearance, and no one had ever discussed such a comment with her.

Staffer-5 did not recall the LG ever using the phrase, denied hearing him say that he wanted his team to look good, and did not think the LG had ever spoken with her about someone's appearance or mannerisms in terms of an executive appearance. The only related conversation Staffer-5 recalled concerned a sloppily dressed male photographer attending events. Trooper-1 denied ever hearing the LG use the phrase "executive presence" or say that his staff needed to look good. Staffer-7 likewise said he had never heard the phrase or comments about Staffer-6's appearance.

The LG maintained that he commented from time to time about how individuals carried themselves, and that his terminology, "executive presence," had nothing to do with physical appearance. He said the term applies to men and women, tall or short, and that part of it is eye contact, standing up straight, and being a good communicator. Asked about the [REDACTED], the LG said that being on the [REDACTED] is itself executive presence and that he is looking for someone who can represent the department well. The LG said that he meant that Staffer-6 has branding experience and knows how to make the Department

of State look good. The LG said that he has known Staffer-6 for decades, that he has never dated her, and that there was a specific reason he hired each member of his team, none of which had anything to do with appearance. Asked whether someone might have misperceived his comments as referring to physical attributes, the LG said it was possible but unlikely, since no one had ever raised a concern with him. He said he would have immediately apologized if someone were offended. The LG also said he had never told anyone on staff that they lacked executive presence, stating that he uses the term as an affirmative and not a negative.

“One On Each Arm”

Staffer-1 also recounted an incident in which the LG was walking with Staffer-1 and Staffer-3 (both women) and allegedly said that having “one on each arm” made the LG look good. Staffer-1 said the comment made her uncomfortable because she understood it to refer to her physical appearance.

Staffer-3 separately confirmed hearing the LG say words to the effect of “one on each arm, you make me look good” in reference to her and Staffer-1. Although Staffer-3 initially said to investigators that she interpreted the remark as referring to their status as trusted advisors as opposed to their appearance, she later said during the same interview that the remark made her feel “a little ‘eh,’” that it “didn’t need to be said” that way, and that it clearly impacted Staffer-1.

When asked about this alleged comment, the LG did not deny it, but stated that he made similar comments to both men and women and that such comments are not about physical appearance.

C. Ethics Allegations

This section summarizes the facts pertinent to the following ethics allegations: (1) whether the LG brought guests to ticketed events without payment or reimbursement; and (2) whether the LG encouraged another New Jersey department to promote his romantic partner, Individual-1.

1. Guests at Ticketed Events

Lowenstein identified seven ticketed events between February 19 and May 23, 2026, at which the LG reportedly appeared with one or more guests who were admitted without payment: (1) a February 19, 2026, African American Chamber of Commerce Black History Month gala at the Venetian in Garfield; (2) a February 21, 2026, opera, “An Evening with King Champagne,” at the State Opera of New Jersey in Trenton; (3) a February 24, 2026, Rowan University Rosa Parks Scholarship Luncheon in Glassboro; (4) an April 18, 2026, Essex County Democratic Committee’s Women of Excellence Lunch in West Orange; (5) an April 18, 2026, Whitesboro Black History Gala in Cape May County; (6) a May 2, 2026, 250th Anniversary event at Morven Museum & Garden in Princeton; and (7) a May 23, 2026, Crossroads Theatre Company event in New

Brunswick.⁵ The evidence shows the LG attended one other event with an unpaid guest, but for which a date could not be established. Attached as **Exhibit 5** is an Index of Events listing the ticketed events that the LG attended with an unpaid guest, based on the information collected during our review. The reported ticket costs, where known, ranged from \$65 to \$300.

Staffer-1 stated that, shortly after inauguration, the LG started bringing guests to ticketed events without prior authorization and without payment. Staffer-2 corroborated that account. Staffer-2 said the issue came to light for her when she and other staff were reviewing photographs for the LG's social media from one of the first official events after the inauguration and saw a woman, now known to her as Individual-1, with the LG. Staffer-2 also stated that the LG brought his daughter to at least one ticketed event without payment. Staffer-2 said she told Staffer-7 that she needed to know in advance when the LG planned to bring a guest, so seating could be adjusted. Staffer-5 likewise became aware of an event where the LG brought Individual-1, adding that she learned of the guest's unpaid attendance only after seeing photographs. Staffer-5 stated that the office had been working to address the issue of guests at events and confirmed that office staff met with the Chief Ethics Officer at the beginning of the administration and reviewed the rules. Staffer-3 similarly recounted that the LG's team raised the issue of the LG bringing unpaid

⁵ Witnesses provided differing accounts about who rode to events in the LG's trooper-driven vehicle. We did not identify a violation of state policy with respect to the LG's use of his State Police detail as described.

guests to events, and cautioned him against doing so. According to Staffer-3, the LG's reaction with regard to a particular event depended on how important the event was to him.

Individual-2, who was identified as a longtime friend of the LG, stated that she accompanied the LG at two April 18 events. She said she walked through a buffet at one event without eating, and was served a meal at the other. Individual-2 said Staffer-7 told her afterward that the meal she was served cost "more than \$100."⁶ Individual-2 stated she had no knowledge of any payment requirement.

The LG offered explanations when we questioned him on this subject. He said that he did not fully understand the applicable rules, that the area was "gray," and that he did nothing wrong by bringing guests to events. The LG said his daughter had a business reason to attend the February 24, 2026, Rowan University luncheon because she sits on the New Brunswick Board of Education, and that no one told him he needed to reimburse the venue or the State for her attendance.⁷ Regarding the two events that Individual-2 attended on April 18, the LG said that the trip was related to Individual-2's expertise in AI, and that she attended the event with him so that she could create educational videos.⁸

⁶ We confirmed that the cost of general admission to this event was \$75.

⁷ The LG's letter in response to the Anonymous Complaint claimed that she had a different purpose in attending: "[s]he attended as my daughter and guest. . . a senior at Rutgers University at the time, [she] was invited because she could share her experiences as a college student and soon-to-be graduate with students and attendees at the event."

⁸ Individual-2 said that she attended these events as the LG's "guest" and "friend," and believed she was brought along because the LG wanted to share his accomplishments with her. Individual-2 stated that she was neither retained as a consultant nor paid by the State for any work undertaken on behalf of the LG.

After learning of this investigation, the LG provided reimbursement for one of the events. Specifically, the LG stated that he reimbursed the State \$175 for the May 2, 2026, 250th Anniversary event at Morven Museum & Garden that Individual-1 attended, and that he coordinated that payment with Staffer-5 even though the venue advised that such payment was not required. Staffer-5 provided a copy of the receipt, which is attached as **Exhibit 6**.

Ethics Trainings Received by the LG

The LG received both formal and informal training on the applicable ethics rules. The first training was a standard session that took place in January 2026. Then, on February 9, 2026, the LG received training regarding compliance with both the Code of Conduct and Uniform Ethics Code.

Staffer-1 said she spoke with the LG about bringing guests to events less than three weeks later on February 25, 2026, urging him to notify staff before arriving at an event with a guest so that the logistics could be handled and reimbursement provided when necessary.

Witnesses reported that despite the guidance Staffer-1 provided to the LG, the LG continued to bring guests to events without advance notice, payment, or reimbursement. As a result, in April 2026, Staffer-1 asked for additional guidance on the applicable ethics rules for guests at events, and received that guidance from the Chief Ethics Officer. Thereafter, Staffer-1 again explained the applicable rules to the LG. In substance, Staffer-1 explained that the LG may not accept free tickets or waiver of registration costs for his

family members or associates, and he may not request that an event sponsor provide him with an additional free ticket or registration fee waiver for someone who is not staffing him.

The LG and his staff received another formal ethics training on May 1, 2026, combining the Code of Conduct and Uniform Ethics Code trainings that the LG and his staff previously received. The LG, Staffer-1, Staffer-2, Staffer-3, Staffer-5, and Staffer-7 attended the training.

Altogether, the LG has received the following workplace conduct and ethics trainings since taking office:

Approximate Date (2026)	Training Type
January	Standard training session
February 9	Formal training regarding compliance with Code of Conduct and Uniform Ethics Code
February 25	Discussion with Staffer-1 about ethics rules related to guests at events
February 27	Formal training on workplace conduct and the Workplace Policy
April	Discussion with Staffer-1 about ethics rules related to guests at events
May 1	Formal training regarding compliance with Code of Conduct and Uniform Ethics Code

2. Misuse of Official Position to Advance a Romantic Partner's Career

On May 26, 2026, the LG sent Official-1⁹ an email, a copy of which is included in the attached **Exhibit 7** and reproduced below. The LG's email copied Individual-1, a state employee and the LG's romantic partner, and forwarded Individual-1's resume and letter of interest addressed to the LG.

The letter from Individual-1 to the LG, written in a formal tone, expressed an interest in a "senior leadership position," outlined her qualifications, and thanked the LG for his service. In his email forwarding that communication, the LG referred to Individual-1 as "my friend," and recommended Individual-1 for a promotion to a leadership position. The LG's May 26 email to Official-1, reproduced below, was sent less than one month after the LG was admonished and trained with regard to workplace conduct and ethics matters on May 1, and four days after the Chief Ethics Officer formally notified the LG on May 22 that this investigation had commenced.



⁹ Official-1 previously worked with the LG, and is now an official within the same department where Individual-1 worked.

Good day,

Received from LG.. Please let me know how you would like me to respond to this one.

From: [REDACTED]
Sent: Tuesday, May 26, 2026 9:41 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Fw: [REDACTED] Leadership Opportunity

[REDACTED]
Good morning. I hope that you had a great Memorial Day weekend. I hear great things about the fantastic things you are doing at [REDACTED]

As we discussed briefly the other day, my friend [REDACTED] has done an incredible job in the [REDACTED] Field Office. She would be a great addition to the [REDACTED] leadership team. I have attached the letter that she sent to me and her resume. I understand that there are some openings in [REDACTED]. Please share her information as you see fit.

Thanks so much for your help. As always, please feel free to text or call me at [REDACTED] at any time. Have a great Tuesday.
Dale

May 20, 2026

The Honorable Dr. Dale G. Caldwell
Lieutenant Governor of New Jersey
State of New Jersey

Dear Lieutenant Governor Caldwell,

I hope this letter finds you well. I am writing to express my interest in being considered for a senior leadership position in [REDACTED] within the [REDACTED]

For more than [REDACTED] years, I have dedicated my professional career to [REDACTED] public service, and community advocacy. Through my current role as a [REDACTED] with [REDACTED] I have developed extensive experience administering [REDACTED] programs, ensuring compliance with [REDACTED] and state regulations, [REDACTED] and serving residents throughout New Jersey with professionalism and compassion.

In addition to my [REDACTED] experience, I have served since [REDACTED] as [REDACTED] where I have gained valuable governance, policy, fiscal oversight, and strategic leadership experience. My combined background in [REDACTED] has strengthened my ability to understand both operational challenges and long-term policy solutions impacting New Jersey families and communities.

I strongly support your vision of strengthening communities, expanding opportunity, and improving quality of life throughout New Jersey. I believe my experience working directly with [REDACTED] would allow me to contribute meaningfully to [REDACTED] mission and to the continued advancement of [REDACTED] across our state.

It would be an honor to further discuss how my background, leadership experience, and commitment to public service may be of value to your administration and the [REDACTED]

Thank you for your time, consideration, and leadership in service to the people of New Jersey.

Respectfully,

[REDACTED]

(Ex. 7.)

Official-1 said that when he first read the LG's email, he did not know who Individual-1 was. Official-1 then contacted Staffer-1 to inquire about Individual-1 and how, if at all, she was connected to the LG. Staffer-1 reported that Individual-1 was the LG's girlfriend. Official-1 then spoke with the LG by telephone and raised the fact that Individual-1 was known by others to be the LG's romantic partner. Official-1 said the LG told him that he and Individual-1 dated before and recently resumed their relationship. Official-1 advised the LG that Individual-1 would not be promoted, and that the LG should be careful. The LG acknowledged to us that Official-1 told him that the perception was that he was pushing for a job for someone he is dating. Official-1 said the LG then asked whether Individual-1 could be transferred to Trenton because she was being mistreated by coworkers, and Official-1 said that was also unlikely to happen in response to the LG's request.

Official-3, a high-ranking official of the department in which Individual-1 worked, learned of the LG's promotion request from a conversation with Official-1. Official-1 reportedly told Official-3 that, in his view, the matter could become an ethics problem, and Official-3 thereafter forwarded to the Chief Ethics Officer the LG's May 26 email recommending Individual-1 for a promotion.

Several days before the May 26 email was sent to Official-1, the LG made a separate attempt to secure a promotion for Individual-1. The LG approached Official-2, another official at the department in which Individual-1 worked, at the [REDACTED] [REDACTED] in [REDACTED], held May [REDACTED], 2026.

Official-2 stated that the LG mentioned an employee who was assigned to a local field office within the same department. Official-2 said the LG told her that Individual-1 had been around a long time, should be doing more substantive work, and should be promoted to a supervisory role. She said the LG asked directly whether there was an opportunity for advancement within the department. Official-2 responded that positions are always posted and anyone is free to apply. Official-2 said that during their conversation the LG did not disclose the nature of his relationship with the employee, who she later learned was Individual-1. Official-1 stated that he overheard this exchange.

The LG acknowledged to us that Individual-1 was his girlfriend and stated that the relationship “goes off and on.” The LG also admitted that he did not disclose the nature of his romantic relationship to Official-1 until Official-1 confronted him about it. He stated that he routinely forwards resumes for capable people without directing that they be hired, that he merely wrote that Individual-1 would be a great addition, and that Official-1 could do with it what he would. The LG claimed that an ethical concern would arise only if he had *insisted* that Individual-1 be hired. The LG recognized that a romantic partner of his could not work for him directly, but stated his view that placement across departments should be permissible.

No promotion, raise, or other benefit was conferred upon Individual-1, who now works outside of state government.

V. Analysis

This section contains an analysis of the facts as applied to relevant law and policy and provides an assessment of whether, based on the credible evidence gathered, the alleged conduct occurred, and whether that conduct violated the relevant state policy.

A. Workplace Conduct

1. Workplace Conduct Rules

The Workplace Policy establishes that the State is committed to providing every employee and prospective employee with a work environment free from discrimination and harassment based on a comprehensive set of protected categories, including race, creed, color, national origin, age, sex, gender, pregnancy, marital status, religion, affectional or sexual orientation, gender identity or expression, genetic information, disability, and military service, among others. (*See generally* Workplace Policy.) It is a “zero tolerance policy,” (*id.* § I.a), and it applies to all employees and applicants across state departments, commissions, colleges, universities, agencies, and authorities, including the LG. The Workplace Policy extends to any location reasonably regarded as an extension of the workplace, including off-site business functions, field locations, and social media posts that adversely affect the work environment. (*Id.*)

As the Workplace Policy notes, “[p]rohibited discrimination/harassment undermines the integrity of the employment relationship, compromises equal employment opportunity, debilitates morale and interferes with work productivity.” (*Id.* § I.b.) The Workplace Policy prohibits any employment practice that treats an individual less

favorably based on a protected category, encompassing recruitment, hiring, training, promotion, compensation, and all other terms and conditions of employment. (*Id.* § II.a.) In addition, it is a violation of the Workplace Policy “to use derogatory or demeaning references regarding” a person’s race, gender, age, religion, disability, or other protected category. (*Id.*) “[A] violation of th[e] policy can occur even if there was no intent on the part of an individual to harass or demean another.” (*Id.*)

The Workplace Policy expressly bars sexual harassment in all its forms, “including hostile work environment harassment [and] quid pro quo harassment.” (*Id.* § II.b.) Under the Workplace Policy, sexual harassment is defined as “unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when, for example: [s]ubmission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment; [s]ubmission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or [s]uch conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment.” (*Id.*)

A violation of the policy can occur even if the derogatory or demeaning language was not directed at the complainant. The policy also “applies to third party harassment,” which is “unwelcome behavior involving [a] protected categor[y] that is not directed at an individual but exists in the workplace and interferes with an individual’s ability to do his/her or their job.” (*Id.* § I.b.)

2. Application to Facts

The evidence substantiates that the LG made a comment to a staffer that was sexually harassing because the comment was sexual in nature and had the effect of unreasonably interfering with the staffer's work performance or creating an intimidating, hostile, or offensive working environment. In addition, the comment was derogatory or demeaning and premised on the staffer's sex. This determination concerns the "young sperm" remark the LG made to Staffer-1 during the April 2026 [REDACTED].

Staffer-1 described an incident at an official event at the [REDACTED] 1 where the LG made a romantic advance toward one of her personal friends. Staffer-1 stated that during the event, she observed the LG ask her friend what she did for a living and how she "built her confidence," which Staffer-1 perceived as the LG's way of flirting. According to Staffer-1, her friend later asked her whether the LG was single, because when Staffer-1 stepped away, the LG had hit on her (Staffer-1's friend) and asked whether she wanted to go dancing with him. Staffer-1 said she cringed at the invitation to her friend, who is much younger than the LG, and was embarrassed by it. Official-1 recalled Staffer-1 telling him about this incident soon after it occurred. The LG acknowledged meeting Staffer-1's friend at the event, asking whether she was single, and later telling Staffer-1 that her friend was very attractive and asking for her phone number, but denied inviting her out.

On April [REDACTED] 2026, during the [REDACTED] in [REDACTED], Staffer-1 was riding in the back seat of the LG's trooper-driven

vehicle. Trooper-1 was driving, and no one else was present. As set forth above, Staffer-1 said that the LG asked whether Staffer-1's friend, whom he had met at the [REDACTED], was still single. When Staffer-1 said her friend was not looking for a relationship, the LG remarked that ambitious and successful women like Staffer-1 and her friend needed a man in a position to help them, but that "you young women are looking for young sperm."

While the LG denied making the remark, including as a joke, we do not find his denial credible. Instead, we credit Staffer-1's account, based on the specificity and consistency of her story across two formal interviews; the photograph she took to memorialize the date, time, and location of the incident, which we reviewed together with its metadata; her description of the exchange soon after it occurred to Staffer-2 as "textbook sexual harassment"; and the LG's admitted interest in Staffer-1's friend upon meeting her. The credibility of Staffer-1's account of this incident was also supported by the LG's pattern of comments relating to a protected category.¹⁰

¹⁰ As recounted in the facts section, certain witnesses said that the LG made a number of other comments that made state employees feel uncomfortable in the workplace. The LG's use of the term "executive presence" was perceived by some witnesses, though not all, to refer to physical appearance. The LG also remarked to two female staffers as they were standing beside him that having "one on each arm" made him look good. Several staffers stated that the LG raised the subject of finding a "first lady" and asked at least some of them to help. Notably, the LG acknowledged the substance of certain of the comments, but insisted that he was either not being serious or not referring to any person's physical appearance. The fact that certain of these statements related to sex or gender were admittedly made by the LG lends credence to Staffer-1's already credible account of the [REDACTED] incident.

Trooper-1 said he did not hear the conversation or the circumstances Staffer-1 described. Trooper-1 explained that when driving he attends to safety, navigation, and radio updates from the other troopers on the detail. Under the circumstances, Trooper-1's recollection does not discredit Staffer-1's account.

The LG directed his remark about "young sperm" to a subordinate in the course of official travel. The LG's comment was sexual in nature, and Staffer-1 recounted that it caused her to change the way she interacted with the LG at work, attempt to distance herself from him, and avoid travel with him when possible. We find that the comment therefore had the "effect of unreasonably interfering with [Staffer-1's] work performance or creating an intimidating, hostile, or offensive working environment," which constitutes sexual harassment under the Workplace Policy. (Workplace Policy § II.b.) Additionally, the comment was derogatory or demeaning with regard to Staffer-1's sex, which is a protected category. (*Id.* § II.a.) A violation of the Workplace Policy with respect to this incident has been substantiated.

B. Ethics

1. Ethics Rules

The Lieutenant Governor of New Jersey is subject to distinct but overlapping sets of ethics rules. Both the Governor and Lieutenant Governor are bound by the Code of Conduct. The Code of Conduct's purpose is to "ensure public trust and confidence by providing a clear standard of conduct for the Governor." (Code of Conduct § I.) Relevant here, the Code of Conduct contains ethics rules related to solicitation and receipt of gifts,

attendance at events and functions, and conflicts and the appearance of conflicts. (*See id.* §§ III.A, III.B, III.F.)

All other state officers and employees, including the Secretary of State, are subject to the Uniform Ethics Code. Because the Lieutenant Governor also serves as Secretary of State, certain activities he conducts in that capacity implicate the Uniform Ethics Code. Relevant here, the Uniform Ethics Code contains ethics rules related to the appearance of impropriety, misuse of official position, acceptance of gifts, attendance at events, and conflicts of interest regarding, *inter alia*, individuals involved in dating relationships. (Uniform Ethics Code §§ II.4, II.5, III, IV, XIII.)

2. Application to Facts

The evidence substantiates that ethics violations occurred (1) when the LG brought guests to ticketed events without payment or reimbursement; and (2) when the LG advocated for his romantic partner, Individual-1, to be promoted within another executive branch department.

a. Guests at Ticketed Events

Event records, documents, the accounts of Staffer-1, Staffer-2, Staffer-3, and Staffer-5, and the LG's own statements establish that, on several occasions, the LG brought personal guests to ticketed events, in his capacity as Lieutenant Governor and/or as Secretary of State, without advance authorization and without payment. The LG's guests included Individual-1, his daughter, and Individual-2.

The LG acknowledged that guests attended paid events, and that he began reimbursing only recently, after this investigation began. Despite receiving repeated trainings on the topic, as well as one-on-one admonitions, he maintained that he did not know the rules for paid events and that the area was “gray.”

The LG received relevant ethics training in January and February 2026. Thereafter, on February 25, 2026, Staffer-1 urged the LG to notify staff before bringing a guest to an event and to provide reimbursement. In April 2026, the LG was advised that bringing unpaid guests to official events violates the ethics rules. The LG received supplemental training on May 1, 2026, after the LG’s staff reported, among other things, that he was continuing to bring unauthorized guests to events. Specifically, the LG was advised that he may accept a free ticket or waived registration only for himself and for staff members assisting him at an event, but that he may not accept free tickets or waived registrations for family members, friends, dates, or close associates. Nonetheless, the LG persisted in this conduct, including on May 2, 2026, the day after he had attended the May 1, 2026, ethics training, and on May 23, 2026, the day after he was notified of this investigation.

Staffer-3 said she was aware of the concern about the LG bringing “plus-ones” to events, and that the LG’s team has raised and cautioned him about this practice. She said the LG’s reaction to staff telling him not to bring a guest depends on how important the event is to him. Staffer-5 said the office has been working to address the issue of unpaid guests, and confirmed that office staff met with the Chief Ethics Officer at the beginning of the administration and reviewed the rules.

Code of Conduct § III.B permits the Lieutenant Governor to attend events only under enumerated circumstances, including if his or her attendance at the event furthers a public purpose, is paid for by the State or by a State Committee or other similar entity, or is paid for with personal funds. The Lieutenant Governor may also attend events not open to the general public. Under Uniform Ethics Code § IV, a state employee shall not attend an event in his or her official capacity unless a legitimate State purpose will be served, or the associated costs are paid or reimbursed. In addition, Code of Conduct § III.A and Uniform Ethics Code § III prohibit accepting anything of value except in limited circumstances enumerated by the rules, none of which apply here.

Where a sponsor waives admission for an official's family member, friend, or date, the value of that admission is an impermissible benefit to the official.¹¹ The credible evidence shows that the LG accepted admission for his daughter, Individual-2, and Individual-1 without payment or reimbursement on multiple occasions, despite receiving explicit instruction regarding this practice.¹²

Uniform Ethics Code § II.5 prohibits use of an official position to secure unwarranted privileges or advantages for oneself or others. The LG's guests were admitted without charge, which is an unwarranted privilege. Code of Conduct § III.F.8 and Uniform

¹¹ Our findings do not address any *offer* of waived admission by event organizers. Rather, it is the *acceptance* of waived admission by the LG for his personal guests that constitutes the violation of state ethics rules.

¹² The LG offered certain explanations for the attendance of his daughter and Individual-2 at the events referenced in this report. However, his purported justifications do not excuse compliance with the applicable rules.

Ethics Code § II.4 prohibit conduct that might reasonably be expected to create an impression or suspicion among the public that the official is engaged in improper conduct. Free admission, furnished to the LG's daughter, his friend, and his romantic partner, creates that impression.

The LG's alleged violation of Code of Conduct §§ III.A and III.F.8, and Uniform Ethics Code §§ II.4, II.5, and III has been substantiated.

b. Misuse of Official Position to Advance a Romantic Partner's Career

At the [REDACTED] in [REDACTED] during the week of May [REDACTED], 2026, the LG told Official-2, a leader in the department in question, that he knew someone (Individual-1) who would be well suited to a leadership role there, that she had been around a long time, and that she should be a supervisor. During this conversation, the LG did not disclose the nature of his romantic relationship with Individual-1. Official-1 said that he overheard that exchange.

The evidence shows that on May 26, 2026, four days after the Chief Ethics Officer notified the LG of this investigation and less than a month after he was admonished and trained regarding ethics and workplace issues, the LG emailed Official-1 about Individual-1, seeking her promotion. In that exchange the LG forwarded a communication from Individual-1, the tone of which was formal and inconsistent with their dating relationship. The LG copied Individual-1 via her personal email address and forwarded her resume and letter of interest to Official-1. In the email, the LG referred to Individual-1 as "my friend,"

wrote that she “has done an incredible job in the [municipal] Field Office,” and stated that she “would be a great addition to the [department’s] leadership team.” (Ex. 7 at 2.)

Official-1 learned of the romantic relationship only by calling Staffer-1, who told him that Individual-1 was the LG’s girlfriend. Official-1 then raised the matter with the LG directly, who admitted that he and Individual-1 had dated on and off and had recently resumed a romantic relationship. The department declined to advance Individual-1’s candidacy, and she now works outside of state government.

The LG maintained that his forwarding of Individual-1’s resume was permissible because he did not insist that she be hired. But Uniform Ethics Code § II.5 prohibits using one’s official position to secure unwarranted privileges or advantages for oneself or for others. Code of Conduct § III.F.8 provides that the LG “shall not knowingly act in any way that might reasonably be expected to create an impression or suspicion among the public, having knowledge of his or her official duties, that he or she may be engaged in conduct inconsistent with this Code.” Additionally, Uniform Ethics Code § XIII states explicitly, “a State officer or employee or special State officer or employee shall not have any involvement in his/her official capacity in any matter that pertains to or involves an individual with whom he/she has a dating relationship.”

By recommending a person with whom he was in a dating relationship for a promotion, the LG clearly violated these provisions. These rules do not turn on whether the LG’s request was framed as a demand, as they prohibit any attempt to use one’s official position to benefit a romantic partner. Such an attempt is also a clear conflict of interest in

violation of Uniform Ethics Code § XIII and Code of Conduct § III.F. These violations are punctuated by the fact that the LG's interactions involved multiple instances of communication with high-ranking officials of an executive branch department where the LG failed to disclose the nature of his relationship with Individual-1 while seeking to advance her career.

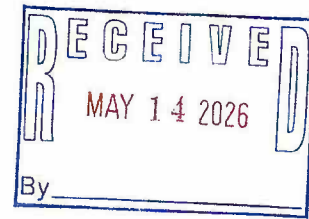
The LG's alleged violation of Uniform Ethics Code §§ II.5 and XIII, and Code of Conduct § III.F has been substantiated.

VI. Conclusion

As a result of our review and for the reasons stated above, we have concluded that the credible evidence substantiates that (1) the LG violated the Workplace Policy in his conduct toward women by commenting to a female staffer that young women want "young sperm"; (2) the LG violated the Uniform Ethics Code and Code of Conduct when he brought guests to ticketed events without payment or reimbursement; and (3) the LG violated the Uniform Ethics Code and Code of Conduct when he sought to obtain a promotion for a state employee with whom he had a romantic relationship.

EXHIBIT 1

May 6, 2026



State Ethics Commission
Attention: Executive Director
PO Box 082
Trenton, NJ 08625-0082

Civil Service Commission
Attention: Director
Division of EEO/AA
PO Box 315
Trenton, NJ 08625-0315

NJ Office of the Attorney General
Division of Criminal Justice
PO Box 085
Trenton, NJ 08625-0085

New York Times
Attention: Tracey Tully
620 8th Avenue
New York, NY 10018

To Whom It May Concern:

The NJ Lieutenant Governor, Dale Caldwell, has been bringing uninvited female guests to events while traveling using taxpayer funds. These guests did not have paid tickets to any of the events. He just showed up with them and they were admitted for free because he is the Lieutenant Governor and no one wants to tell him 'no'. He did this on February 24th at the Rowan University Rosa Parks Scholarship Luncheon and again at the Whitesboro Black History Gala on April 18th. He also brought an uninvited female guest to the Essex County Democratic Committee's Women of Excellence Lunch on April 18th, and the woman he brought with him demanded to be seated at the head table even though she arrived unexpected and without a ticket. This incident was disruptive to the event.

The Lieutenant Governor is also hitting on women at functions while traveling using taxpayer money. He has been particularly shameless in handing out his state business cards and asking women out on dates. He has been observed doing this many times while out on official business, which is highly inappropriate for any state official to be doing. Given his position, the power imbalance between him and these women is coercive.

Enough is enough! He should not be trying to get dates while he is traveling on the taxpayer's dime. And he should not be accepting free tickets to costly events for the women he is trying to impress. Please put a stop to this shameless and corrupt behavior.

Sincerely,

A Concerned NJ Resident

EXHIBIT 2



STATE OF NEW JERSEY
OFFICE OF THE GOVERNOR

P.O. Box 001
Trenton, New Jersey 08625-0001

Mikie Sherrill
Governor

CONFIDENTIAL

May 22, 2026

Via Email to: [REDACTED]

Lieutenant Governor Dr. Dale G. Caldwell

[REDACTED]

Re: Complaint- S-02-26

Dear Lieutenant Governor Caldwell:

We are in receipt of a complaint against you dated May 6, 2026 (received May 14, 2026), alleging certain workplace misconduct and ethics violations.

The investigation of this complaint has been assigned to Lowenstein Sandler LLP. Christopher Porrino or Shontae Gray of that firm will be in contact with you soon. The existence of an investigation does not constitute a finding of wrongdoing.

In the meantime, you are instructed to ensure that documents that might be relevant to the investigation—in whatever medium and on whatever device they exist, regardless of whether you deem them personal or related to your official position—not be destroyed. If you require technical assistance to accomplish that, we can of course work with our information technology specialists, who would not be informed about the reason for the request or the fact of the investigation.

Please be advised that the law prohibits retaliation against any employee who alleges that he/she/they were the victim of workplace misconduct or provides information in the course of an investigation.

The State of New Jersey is committed to ensuring a safe and professional working environment for all of its employees—investigating allegations of wrongdoing is a critical component to accomplishing that objective. Should you have any questions, please contact Mr. Porrino at [REDACTED] or Ms. Gray at [REDACTED].

Lt. Gov. Caldwell
May 22, 2026
Page 2

Thank you in advance for your cooperation.

Very truly yours,

A handwritten signature in blue ink that reads "Christina C. Fullam". The signature is written in a cursive style with a large, looped initial "C".

Christina C. Fullam
Chief Ethics Officer

EXHIBIT 3



STATE OF NEW JERSEY
OFFICE OF THE GOVERNOR
PO BOX 001
TRENTON
08625
609-292-6000

MIKE SHERRILL
GOV

DALE CALDWELL
LT GOV

May 28, 2026

Christina C. Fullam
State Ethics Commission
P.O. Box 082
Trenton, NJ 08625-0082

Dear Christina C. Fullam,

On Wednesday, May 26, 2026, I received by mail a copy of a letter dated May 6, 2026, accusing me of ethical violations. I take these allegations extremely seriously. Throughout my entire professional life, I have worked to serve others with integrity, discipline, scholarship, faith, and respect for all people. Therefore, it is deeply disappointing and personally painful for someone to attempt to damage my reputation and slander my character with false and misleading accusations.

The opportunity to serve as Lieutenant Governor in the Sherrill Administration is the greatest honor of my life. I take my responsibilities as Lieutenant Governor and Secretary of State with the utmost seriousness and humility. Since assuming office, I have worked tirelessly to represent the Administration in a positive, ethical, professional, and gentlemanly manner. I have likely spent more time traveling throughout New Jersey than many previous Lieutenant Governors because I believe it is important for residents across the state to know that this Administration wants to hear from them directly so that we can better serve them.

Because of the highly public nature of my role, I interact with thousands of people throughout the state from all backgrounds and communities. While I am troubled by this accusation, as the first single Black man to serve at this level in government, I suspect that there will be other false accusations or rumors in the future. Unfortunately, in this current political environment, false accusations, especially against people of color, seem to be commonplace. The accusations contained in this complaint are inaccurate, misleading, and completely false. For that reason, I fully welcome a fair, objective, and professional review of these allegations by the attorneys and investigators assigned to this matter because I am confident that the facts will fully clear my name.

First, I have never asked anyone out on a date, "hit on," or pursued anyone romantically while conducting official business as Lieutenant Governor and Secretary of State. Throughout my career in government, higher education, nonprofit leadership, ministry, and public service, I have consistently conducted myself professionally and respectfully.

Second, the implication that I selectively distribute business cards to women for inappropriate reasons is categorically untrue. In fact, I have distributed my business card to significantly more men than women as part of my public responsibilities and networking duties associated with serving the people of New Jersey. In most instances, I provide the contact information of my Senior Advisor, [REDACTED], rather than my own direct contact information.

Third, the complaint intentionally misrepresents the circumstances surrounding the events referenced. On February 24, 2026, my daughter, [REDACTED] attended the Rowan University Rosa Parks Scholarship Luncheon with me. She attended as my daughter and guest. [REDACTED], a senior at Rutgers University at the time, was invited because she could share her experiences as a college student and soon-to-be graduate with students and attendees at the event. Any suggestion that her attendance was connected to inappropriate conduct is entirely false. Similarly, on April 18, 2026, [REDACTED] attended the Whitesboro and Essex County events because of her professional expertise in artificial intelligence, social media and technological innovation. As the official in the Sherrill Administration primarily responsible for Tourism and the New Jersey Cultural Trust and Historical Commission, I have become increasingly concerned that younger generations may not fully appreciate the extraordinary 250-year history of New Jersey and the United States unless we find innovative ways to bring history to life.

[REDACTED] was invited because of her expertise and her ability to assist efforts connected to the Tourism, Cultural Trust, and Historical Commission divisions of the Department of State. I have known [REDACTED] professionally for more than a decade. We have never dated, nor have I ever had any romantic interest in dating her. She is a consummate professional with tremendous expertise in AI, digital storytelling, and social media engagement.

As a direct result of her attendance and contributions, [REDACTED] voluntarily created, on a pro bono basis, an extraordinary AI-generated depiction of Washington crossing the Delaware and is currently working on similar AI videos depicting other pivotal moments in American and New Jersey history, including the Battle of Princeton. I would be pleased to share the video she produced with investigators as evidence of the legitimate professional purpose for her attendance.

The suggestion that these professional and family relationships somehow constitute unethical behavior is completely inaccurate and without merit. Unfortunately, the complaint appears to be driven by misinformation, false assumptions, and what seems to be a personal vendetta against me. I have dedicated my life to public service, education, faith leadership, economic development, and community empowerment.

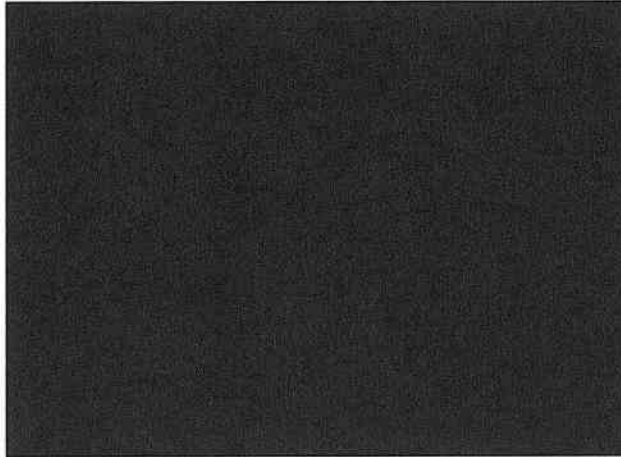
Throughout my career, I have consistently worked to uplift others, create opportunities, strengthen communities, and serve with honor. I will continue to cooperate fully with any review process because I firmly believe that truth, professionalism, facts, and integrity ultimately prevail over rumor, innuendo, and false accusations. I remain fully committed to serving the people of New Jersey and representing the Sherrill Administration with integrity, dignity, professionalism, and transparency.

Sincerely,



Dr. Dale G. Caldwell
Lieutenant Governor and Secretary of State

EXHIBIT 4



100% 100%

Apr 12, 2026 - 3:13 PM

Adjust

MAC_5700

Apple iPhone 16 Pro Max

Main Camera — 24 mm f/1.78

24 MP • 4288 × 5712 • 3.6 MB

STANDARD

ISO 60

39 mm

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Show in All Photos



EXHIBIT 5

Date (2026)	Event	Guest Reportedly Brought	Reported Cost
Feb. 19	African American Chamber of Commerce – Black History Month Gala, at the Venetian, in Garfield	Individual-1	\$300
Feb. 21	“An Evening with King Champagne,” at the State Opera of New Jersey, in Trenton	Individual-1	\$190
Feb. 24	Rowan University’s Rosa Parks Scholarship Luncheon, in Glassboro	The LG’s Daughter	\$65
Apr. 18	Essex County Democratic Committee’s Women of Excellence Lunch, in West Orange	Individual-2	Unknown
Apr. 18	Whitesboro Black History Gala, in Cape May County	Individual-2	\$75
May 2	250th Anniversary event, at Morven Museum & Garden, in Princeton	Individual-1	\$175
May 23	Crossroads Theatre Company event, in New Brunswick	The LG’s Daughter	\$150
Unknown	Faith Action Network Lunch	Individual-1	Unknown

EXHIBIT 6

Morven Museum & Garden

55 Stockton Street · Princeton, NJ 08540
morven.org · (609) 924-8144

Receipt #: 1234

Date: 06/12/2026

Received from

Name: Dale Caldwell

Email:

Description	Qty	Unit price	Amount
Exhibition Premiere & Founding Feast, May 2, 2026	1	\$175	\$175

Subtotal	\$175	
Tax		\$
Total	\$175	
Payment method		

Notes

For tax purposes, Historic Morven, Inc. certifies that the tangible value of each ticket is \$175.

Authorized by
Phone Authorization

Thank you for your support!

EXHIBIT 7



FW: [REDACTED] Leadership Opportunity

From [REDACTED]

Date Tue 5/26/2026 10:44 AM

To [REDACTED]

 1 attachment (152 KB)

5-20-26-[REDACTED] Resume.pdf;

Good day,

Received from LG.. Please let me know how you would like me to respond to this one.

From: [REDACTED]
Sent: Tuesday, May 26, 2026 9:41 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Fw: [REDACTED] Leadership Opportunity

[REDACTED]
Good morning. I hope that you had a great Memorial Day weekend. I hear great things about the fantastic things you are doing at [REDACTED].

As we discussed briefly the other day, my friend [REDACTED] has done an incredible job in the [REDACTED] Field Office. She would be a great addition to the [REDACTED] leadership team. I have attached the letter that she sent to me and her resume. I understand that there are some openings in [REDACTED]. Please share her information as you see fit.

Thanks so much for your help. As always, please feel free to text or call me at [REDACTED] at any time. Have a great Tuesday.
Dale

May 20, 2026

The Honorable Dr. Dale G. Caldwell
Lieutenant Governor of New Jersey
State of New Jersey

Dear Lieutenant Governor Caldwell,

I hope this letter finds you well. I am writing to express my interest in being considered for a senior leadership position in [REDACTED] within the [REDACTED].

For more than [REDACTED] years, I have dedicated my professional career to [REDACTED], public service, and community advocacy. Through my current role as a [REDACTED] with [REDACTED], I have developed extensive experience administering [REDACTED] programs, ensuring compliance with [REDACTED] and state regulations, [REDACTED], and serving residents throughout New Jersey with professionalism and compassion.

In addition to my [REDACTED] experience, I have served since [REDACTED] as [REDACTED]
[REDACTED] where I have gained
valuable governance, policy, fiscal oversight, and strategic leadership
experience. My combined background in [REDACTED]
[REDACTED] has strengthened my ability to understand
both operational challenges and long-term policy solutions impacting New
Jersey families and communities.

I strongly support your vision of strengthening communities, expanding
opportunity, and improving quality of life throughout New Jersey. I believe my
experience working directly with [REDACTED]
[REDACTED] would allow me to
contribute meaningfully to [REDACTED] mission and to the continued advancement of
[REDACTED] across our state.

It would be an honor to further discuss how my background, leadership
experience, and commitment to public service may be of value to your
administration and the [REDACTED]

Thank you for your time, consideration, and leadership in service to the people
of New Jersey.

Respectfully,

[REDACTED]

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