

COMPLAINT - SUMMONS

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. SUDHAN M THOMAS	
1424	S	2019	000402		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
MORRISTOWN MUNICIPAL COURT P.O. BOX 150 MORRISTOWN NJ 07963-0150 973-292-6687 COUNTY OF: MORRIS					
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 201906207	DEFENDANT INFORMATION		
COMPLAINANT NAME: ROSS PORTNER 25 MARKET ST P O BOX 085 TRENTON NJ 08625			SEX:	EYE COLOR:	DOB:
			DRIVER'S LIC. #:	SOCIAL SECURITY #:	DL STATE:
			TELEPHONE #:	SBI #:	
			LIVESCAN PCN #:		

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 07/29/2019 in **MORRISTOWN TOWN**, **MORRIS** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, THE SAID SUDHAN THOMAS, PRESIDENT OF THE JERSEY CITY BOARD OF EDUCATION, UNDER THE COLOR OF OFFICE AND IN CONNECTION WITH ANY OFFICIAL ACT PERFORMED OR TO BE PERFORMED BY HIM, DIRECTLY OR INDIRECTLY, KNOWINGLY DID SOLICIT, ACCEPT OR AGREE TO ACCEPT A BENEFIT, WHETHER THE BENEFIT INURED TO HIMSELF OR ANOTHER PERSON, TO INFLUENCE THE PERFORMANCE OF AN OFFICIAL DUTY OR TO COMMIT A VIOLATION OF AN OFFICIAL DUTY; THAT IS, THE SAID SUDHAN THOMAS DID SOLICIT AND ACCEPT APPROXIMATELY \$35,000 IN U.S. CURRENCY FROM COCONSPIRATOR #1 KNOWING THAT SAID CURRENCY WAS GIVEN IN ORDER TO INFLUENCE THE SAID SUDHAN THOMAS TO AID COCONSPIRATOR #1 IN SECURING A PUBLIC POSITION OR PUBLIC WORK FROM THE JERSEY CITY BOARD OF EDUCATION, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:27-10 (A) , A CRIME OF THE SECOND DEGREE.

in violation of:

Original Charge	1) 2C:27-10A	2)	3)
Amended Charge			

CERTIFICATION:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: ROSS PORTNER Date: 12/19/2019

The complaining witness is a law enforcement officer and a judicial probable cause determination is not required prior to the issuance of this Complaint-Summons.

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the Superior Court in the county of: MORRIS

at the following address: MORRIS SUPERIOR COURT

WASHINGTON & COURT STREETS P.O. BOX 910 MORRISTOWN NJ 07963-0910

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest: Appearance Date: 12/23/2019 Time: 08:30AM Phone: 862-397-5700

Signature of Person Issuing Summons: ROSS PORTNER Date: 12/19/2019

Domestic Violence – Confidential

Related Traffic Tickets or Other Complaints

Serious Personal Injury/ Death Involved

Special conditions of release:

- No phone, mail or other personal contact w/victim
- No possession firearms/weapons
- Other (specify):

ORIGINAL

COMPLAINT – SUMMONS (Court Action)

COMPLAINT NUMBER				STATE V.
1424	S	2019	000402	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	SUDHAN M THOMAS

FTA Bail Information		Date Bail Set: _____	Amount Bail Set: \$ _____ by: _____	<input type="checkbox"/> Bail Recog. Attached
Released on Bail	R.O.R.	Committed Default	Committed w/o Bail	Date Referred to County Prosecutor: _____
Place Committed: _____				Defendant Desires Counsel: <input type="checkbox"/> Yes <input type="checkbox"/> No
Date of First Appearance: 12/23/2019	<input type="checkbox"/> Advised of Rights by _____			

Prosecuting Attorney Information				Defense Counsel Information					
Name:				Name:					
State	County	Municipal	Other	None	Retained	Public Def	Assigned	Waived	Other

Original Charge	1) 2C:27-10A	2)	3)
Amended Charge			
Waiver Indt/Jury			
Plea/Date of Plea	Plea: _____ Date: _____	Plea: _____ Date: _____	Plea: _____ Date: _____
Adjudication (* see code)	Finding Code: _____ Date: _____	Finding Code: _____ Date: _____	Finding Code: _____ Date: _____
Jail Term	Jail time credit _____ Susp. Imp _____	Jail time credit _____ Susp. Imp _____	Jail time credit _____ Susp. Imp _____
Probation Term	Susp. Imp _____	Susp. Imp _____	Susp. Imp _____
Cond. Discharge Term			
Community Service			
D/L Suspension Term			
Fines/Costs	Fines: _____ Costs: _____	Fines: _____ Costs: _____	Fines: _____ Costs: _____
VCCB/SNSF	VCCB: _____ SNSF: _____	VCCB: _____ SNSF: _____	VCCB: _____ SNSF: _____
DEDR/Lab Fee	DEDR: _____ LAB: _____	DEDR: _____ LAB: _____	DEDR: _____ LAB: _____
CD Fee/Drug Ed Fnd	CD: _____ DAEF: _____	CD: _____ DAEF: _____	CD: _____ DAEF: _____
DV Surch/Other Fees	DV: _____ Other: _____	DV: _____ Other: _____	DV: _____ Other: _____
Restitution Beneficiary: _____			

Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes: Related Traffic Tickets and Complaints:	<p style="text-align: center;">* Finding Codes</p> <ul style="list-style-type: none"> 1 – Guilty 2 – Not Guilty 3 – Dismissed – Other 4 – Guilty but Merged 5 – Dismissed-Rule 6 – Dismissed Lack of Prosecution 7 – Dismissed – Pros Motion/Vic Req 8 – Conditional Discharge D – Dismissed- Prosecutor Discretion M – Dismissed- Mediation P – Dismissed-Plea Agreement S – Disposed at Superior W – Dismissed-False ID
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COMPLAINT - SUMMONS (DEFENDANT'S COPY)

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> VS. SUDHAN M THOMAS	
1424	S	2019	000402		
<small>COURT CODE</small>	<small>PREFIX</small>	<small>YEAR</small>	<small>SEQUENCE NO.</small>	ADDRESS: 	
MORRISTOWN MUNICIPAL COURT P.O. BOX 150 MORRISTOWN NJ 07963-0150 973-292-6687 COUNTY OF: MORRIS					
<small># of CHARGES</small> 1	<small>CO-DEFTS</small>	<small>POLICE CASE #:</small> 201906207		<small>DEFENDANT INFORMATION</small>	
<small>COMPLAINANT NAME:</small> ROSS PORTNER			<small>SEX:</small> EYE COLOR: DOB: DL STATE:	<small>DRIVER'S LIC. #:</small> SBI #:	
			<small>SOCIAL SECURITY #:</small> TELEPHONE #: LIVESCAN PCN #:		

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 07/29/2019 in **MORRISTOWN TOWN, MORRIS County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, THE SAID SUDHAN THOMAS, PRESIDENT OF THE JERSEY CITY BOARD OF EDUCATION, UNDER THE COLOR OF OFFICE AND IN CONNECTION WITH ANY OFFICIAL ACT PERFORMED OR TO BE PERFORMED BY HIM, DIRECTLY OR INDIRECTLY, KNOWINGLY DID SOLICIT, ACCEPT OR AGREE TO ACCEPT A BENEFIT, WHETHER THE BENEFIT INURED TO HIMSELF OR ANOTHER PERSON, TO INFLUENCE THE PERFORMANCE OF AN OFFICIAL DUTY OR TO COMMIT A VIOLATION OF AN OFFICIAL DUTY; THAT IS, THE SAID SUDHAN THOMAS DID SOLICIT AND ACCEPT APPROXIMATELY \$35,000 IN U.S. CURRENCY FROM COCONSPIRATOR #1 KNOWING THAT SAID CURRENCY WAS GIVEN IN ORDER TO INFLUENCE THE SAID SUDHAN THOMAS TO AID COCONSPIRATOR #1 IN SECURING A PUBLIC POSITION OR PUBLIC WORK FROM THE JERSEY CITY BOARD OF EDUCATION, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:27-10 (A), A CRIME OF THE SECOND DEGREE.

in violation of:

Original Charge	1) 2C:27-10A	2)	3)
Amended Charge			

CERTIFICATION:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment

Signed: ROSS PORTNER Date: 12/19/2019

The complaining witness is a law enforcement officer and a judicial probable cause determination is not required prior to the issuance of this Complaint-Summons.

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the Superior Court in the county of: MORRIS at the following address: MORRIS SUPERIOR COURT
WASHINGTON & COURT STREETS P.O. BOX 910 MORRISTOWN NJ 07963-0910
If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.
Date of Arrest: Appearance Date: 12/23/2019 Time: 08:30AM Phone: 862-397-5700
Signature of Person Issuing Summons: ROSS PORTNER Date: 12/19/2019

<input type="checkbox"/> Domestic Violence - Confidential	<input type="checkbox"/> Related Traffic Tickets or Other Complaints	<input type="checkbox"/> Serious Personal Injury/ Death Involved
Special conditions of release: <input type="checkbox"/> No phone, mail or other personal contact w/victim <input type="checkbox"/> No possession firearms/weapons <input type="checkbox"/> Other (specify):		COMPLAINT - SUMMONS (DEFENDANT'S COPY) Page 3 of 7 NJ/CDR1 1/1/2017

RETURN OF SERVICE INFORMATION

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> VS. SUDHAN M THOMAS	
1424	S	2019	000402		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
MORRISTOWN MUNICIPAL COURT P.O. BOX 150 MORRISTOWN NJ 07963-0150 973-292-6687 COUNTY OF: MORRIS				ADDRESS :	
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 201906207		DEFENDANT INFORMATION	
COMPLAINANT ROSS PORTNER NAME: 25 MARKET ST P O BOX 085 TRENTON NJ 08625			SEX:	EYE COLOR:	DOB: ---
			DRIVER'S LIC. #:	SOCIAL SECURITY #	DL STATE:
			TELEPHONE #:	SBI #: ()	
			LIVESCAN PCN #:		

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **07/29/2019** in **MORRISTOWN TOWN**, **MORRIS** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, THE SAID SUDHAN THOMAS, PRESIDENT OF THE JERSEY CITY BOARD OF EDUCATION, UNDER THE COLOR OF OFFICE AND IN CONNECTION WITH ANY OFFICIAL ACT PERFORMED OR TO BE PERFORMED BY HIM, DIRECTLY OR INDIRECTLY, KNOWINGLY DID SOLICIT, ACCEPT OR AGREE TO ACCEPT A BENEFIT, WHETHER THE BENEFIT INURED TO HIMSELF OR ANOTHER PERSON, TO INFLUENCE THE PERFORMANCE OF AN OFFICIAL DUTY OR TO COMMIT A VIOLATION OF AN OFFICIAL DUTY; THAT IS, THE SAID SUDHAN THOMAS DID SOLICIT AND ACCEPT APPROXIMATELY \$35,000 IN U.S. CURRENCY FROM COCONSPIRATOR #1 KNOWING THAT SAID CURRENCY WAS GIVEN IN ORDER TO INFLUENCE THE SAID SUDHAN THOMAS TO AID COCONSPIRATOR #1 IN SECURING A PUBLIC POSITION OR PUBLIC WORK FROM THE JERSEY CITY BOARD OF EDUCATION, CONTRARY TO THE PROVISIONS OF N.J.S.A. 2C:27-10 (A), A CRIME OF THE SECOND DEGREE.

in violation of:

Original Charge	1) 2C:27-10A	2)	3)
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Check ✓	Certification by Police Regarding Complaint-Summons
✓	I certify that I served the complaint-summons by delivering a copy to the defendant personally.
	I certify that I personally served the complaint-summons by leaving a copy at the defendant's usual place of abode with a competent member of the household of the age 14 or over _____ Name of family member over 14 years of age
	I certify that I mailed a copy of the complaint-summons by ordinary mail to the defendant at his or her last known address. _____ Defendant's last known address
	I certify that I served the complaint-summons by delivering a copy to a person authorized to receive service of process on the defendant's behalf. _____ Name and title of authorized person
	Other manner of service: I certify that I served the complaint-summons in the following manner: _____
	I certify that I was unable to serve the complaint-summons.

Signed: ROSS PORTNER NJ DIVISION OF CRIM JUSTICE Date of Action: 12/19/2019
Name, Title and Department of Officer

Affidavit of Probable Cause

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> VS. SUDHAN M THOMAS	
1424	S	2019	000402	ADDRESS :	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
MORRISTOWN MUNICIPAL COURT P.O. BOX 150 MORRISTOWN NJ 07963-0150 973-292-6687 COUNTY OF: MORRIS					
# of CHARGES	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION	
1		201906207		SEX: EYE COLOR:	DOB:
COMPLAINANT ROSS PORTNER			DRIVER'S LIC. #:		DL STATE:
NAME: 25 MARKET ST			SOCIAL SECURITY #:		SBI #:
P O BOX 085			TELEPHONE #:		()
TRENTON NJ 08625			LIVESCAN PCN #:		

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:

Related to and continued from complaint number 1424 2019 000401

During this meeting and subsequent telephone conversations, Thomas and the CW discussed specific work projects that the CW would receive from the Jersey City Board of Education and which of those projects would need to be prioritized. Thomas then moved ahead with the agreement to provide work to the CW and placed a public employee in contact with the CW to discuss the projects to be assigned to the CW. On or about July 11, 2019, Thomas called the CW and asked if the CW could provide the remaining balance of the requested contribution for the Re-election campaign for Board President. Thomas explained that if the CW were able to do this, it would remove a great deal of pressure off Thomas in terms of what Thomas wanted to accomplish over the summer. The CW agreed. On or about July 29, 2019, Thomas and the CW met at the Grand Café in Morristown. During their conversation in the Grand Café, the CW told Thomas, "I have the \$25,000 for you, umm, it's in my car." In the parking lot of the restaurant, the CW handed Thomas a manila envelope containing \$25,000 in cash. Thomas accepted the envelope.

Affidavit of Probable Cause

COMPLAINT NUMBER

THE STATE OF NEW JERSEY

1424

S

2019

000402

VS.

SUDHAN M THOMAS

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

Recordings made during investigation and statements made from defendant and conconspirator

3. If victim was injured, provide the extent of the injury:

N/A

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: ROSS PORTNER LAW ENFORCEMENT OFFICER

Date: 12/19/2019

Affidavit of Probable Cause

Page 6 of 7

1/1/2017

Preliminary Law Enforcement Incident Report

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> <i>VS.</i> SUDHAN M THOMAS	
1424	S	2019	000402		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
MORRISTOWN MUNICIPAL COURT P.O. BOX 150 MORRISTOWN NJ 07963-0150 973-292-6687 COUNTY OF: MORRIS				ADDRESS:	
# of CHARGES	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION	
1		201906207		SEX:	EYE COLOR:
COMPLAINANT NAME:			PORTNER	DOB:	DL STATE:
25 MARKET ST				DRIVER'S LIC. #:	SBI #:
P O BOX 085				SOCIAL SECURITY #:	()
TRENTON NJ 08625				TELEPHONE #:	
				LIVESCAN PCN #:	

Purpose: The Preliminary Law Enforcement Incident Report (PLEIR) is intended to document basic information known to the officer at the time of its preparation. It is recognized that additional relevant information will emerge as an investigation continues. The PLEIR shall be in addition to, not in lieu of, any regular police arrest, incident, or investigation reports. Note that the PLEIR is specific to each defendant charged in an investigation.

-The defendant made statements/admissions.
 •It was recorded using:
 *Audio recording only
 *Officer's written notes/Report

-The offense/incident was recorded using electronic/surveillance via:
 •Other/Explain digital recording device

Certification:
 I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: ROSS PORTNER LAW ENFORCEMENT OFFICER Date: 12/19/2019

COMPLAINT - SUMMONS

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> VS. SUDHAN M THOMAS	
1424	S	2019	000401		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	ADDRESS: [REDACTED]	
MORRISTOWN MUNICIPAL COURT P.O. BOX 150 MORRISTOWN NJ 07963-0150 973-292-6687 COUNTY OF: MORRIS					
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 201906207		DEFENDANT INFORMATION	
COMPLAINANT NAME: ROSS PORTNER 25 MARKET ST P O BOX 085 TRENTON NJ 08625				SEX: [REDACTED] EYE COLOR: [REDACTED] DOB: [REDACTED] DL STATE: [REDACTED]	
				DRIVER'S LIC. #: [REDACTED] SBI #: [REDACTED]	
				SOCIAL SECURITY #: [REDACTED] TELEPHONE #: [REDACTED] LIVESCAN PCN #: [REDACTED]	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **07/29/2019** in **MORRISTOWN TOWN MORRIS County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, DID COMMIT AN ACT OF BRIBERY; THAT IS, THE SAID SUDHAN THOMAS, PRESIDENT OF THE JERSEY CITY BOARD OF EDUCATION, KNOWINGLY DID DIRECTLY OR INDIRECTLY SOLICIT, ACCEPT OR AGREE TO ACCEPT FROM ANOTHER, ANY BENEFIT AS CONSIDERATION FOR THE PERFORMANCE OF AN OFFICIAL DUTY; THAT IS, THE SAID SUDHAN THOMAS DID SOLICIT, ACCEPT OR AGREE TO ACCEPT APROXIMATELY \$35,000 IN U.S. CURRENCY FROM COCONSPIRATOR #1 AS CONSIDERATION FOR SECURING A PUBLIC POSITION OR PUBLIC WORK FROM THE JERSEY CITY BOARD OF EDUCATION FOR COCONSPIRATOR #1, IN VIOLATION OF N.J.S.A. 2C:27-2(D), A CRIME OF THE SECOND DEGREE.

in violation of:

Original Charge	1) 2C:27-2D	2)	3)
Amended Charge			

CERTIFICATION:

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SUMMONS

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at the following address: MORRIS SUPERIOR COURT
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If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.
Date of Arrest: Appearance Date: **12/23/2019** Time: **08:30AM** Phone: **862-397-5700**
Signature of Person Issuing Summons: ROSS PORTNER Date: 12/19/2019

- Domestic Violence – Confidential Related Traffic Tickets or Other Complaints Serious Personal Injury/ Death Involved

Special conditions of release:

- No phone, mail or other personal contact w/victim
 No possession firearms/weapons
 Other (specify):

ORIGINAL

COMPLAINT – SUMMONS (Court Action)

COMPLAINT NUMBER				STATE V.
1424	S	2019	000401	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	SUDHAN M THOMAS

FTA Bail Information		Date Bail Set: _____	Amount Bail Set: \$ _____ by: _____	<input type="checkbox"/> Bail Recog. Attached
Released on Bail	R.O.R.	Committed Default	Committed w/o Bail	Date Referred to County Prosecutor: _____
Place Committed: _____				Defendant Desires Counsel: <input type="checkbox"/> Yes <input type="checkbox"/> No
Date of First Appearance: 12/23/2019		<input type="checkbox"/> Advised of Rights by _____		

Prosecuting Attorney Information				Defense Counsel Information					
Name:				Name:					
State	County	Municipal	Other	None	Retained	Public Def	Assigned	Waived	Other

Original Charge	1) 2C:27-2D	2)	3)
Amended Charge			
Waiver Indt/Jury			
Plea/Date of Plea	Plea: _____ Date: _____	Plea: _____ Date: _____	Plea: _____ Date: _____
Adjudication (* see code)	Finding Code: _____ Date: _____	Finding Code: _____ Date: _____	Finding Code: _____ Date: _____
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Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes: Related Traffic Tickets and Complaints:	<p style="text-align: center;">* Finding Codes</p> <ul style="list-style-type: none"> 1 – Guilty 2 – Not Guilty 3 – Dismissed – Other 4 – Guilty but Merged 5 – Dismissed-Rule 6 – Dismissed Lack of Prosecution 7 – Dismissed – Pros Motion/Vic Req 8 – Conditional Discharge D – Dismissed- Prosecutor Discretion M – Dismissed- Mediation P – Dismissed-Plea Agreement S – Disposed at Superior W – Dismissed-False ID
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COMPLAINT - SUMMONS (DEFENDANT'S COPY)

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> VS. SUDHAN M THOMAS	
1424	S	2019	000401		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
MORRISTOWN MUNICIPAL COURT P.O. BOX 150 MORRISTOWN NJ 07963-0150 973-292-6687 COUNTY OF: MORRIS				ADDRESS:	
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 201906207		DEFENDANT INFORMATION	
COMPLAINANT NAME: ROSS PORTNER		SEX: MALE	EYE COLOR: BROWN	DOB: 	DL STATE: NJ
		DRIVER'S LIC. #: 	SOCIAL SECURITY #: 	SBI #: 	
		TELEPHONE #: 	LIVESCAN PCN #: 		

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **07/29/2019** in **MORRISTOWN TOWN**, **MORRIS** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, DID COMMIT AN ACT OF BRIBERY; THAT IS, THE SAID SUDHAN THOMAS, PRESIDENT OF THE JERSEY CITY BOARD OF EDUCATION, KNOWINGLY DID DIRECTLY OR INDIRECTLY SOLICIT, ACCEPT OR AGREE TO ACCEPT FROM ANOTHER, ANY BENEFIT AS CONSIDERATION FOR THE PERFORMANCE OF AN OFFICIAL DUTY; THAT IS, THE SAID SUDHAN THOMAS DID SOLICIT, ACCEPT OR AGREE TO ACCEPT APPROXIMATELY \$35,000 IN U.S. CURRENCY FROM COCONSPIRATOR #1 AS CONSIDERATION FOR SECURING A PUBLIC POSITION OR PUBLIC WORK FROM THE JERSEY CITY BOARD OF EDUCATION FOR COCONSPIRATOR #1, IN VIOLATION OF N.J.S.A. 2C:27-2(D), A CRIME OF THE SECOND DEGREE.

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<input type="checkbox"/> Domestic Violence – Confidential	<input type="checkbox"/> Related Traffic Tickets or Other Complaints	<input type="checkbox"/> Serious Personal Injury/ Death Involved
Special conditions of release: <input type="checkbox"/> No phone, mail or other personal contact w/victim <input type="checkbox"/> No possession firearms/weapons <input type="checkbox"/> Other (specify):		COMPLAINT - SUMMONS (DEFENDANT'S COPY) Page 3 of 7 NJ/CDR1 1/1/2017

Affidavit of Probable Cause

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> VS. SUDHAN M THOMAS	
1424	S	2019	000401	ADDRESS: [REDACTED]	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
MORRISTOWN MUNICIPAL COURT P.O. BOX 150 MORRISTOWN NJ 07963-0150 973-292-6687 COUNTY OF: MORRIS				[REDACTED]	
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 201906207		DEFENDANT INFORMATION	
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				DRIVER'S LIC. #: [REDACTED]	SBI #: [REDACTED]
				SOCIAL SECURITY #: [REDACTED]	TELEPHONE #: [REDACTED]
				LIVESCAN PCN #: [REDACTED]	

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:

In or about February, 2019, law enforcement received information from a cooperating witness (CW) that Sudhan Thomas, President of the Jersey City Board of Education, wanted to meet with the CW to discuss Thomas' upcoming election campaign. The CW further indicated that in 2016 Thomas asked the CW for an illegal political contribution of \$10,000 in cash. Based on this information, Detectives worked with the CW to set up several meetings with Thomas, which were audio and video recorded. Ultimately, Thomas solicited \$110,000 to \$120,000 from the CW. In turn, Thomas, while acting in the capacity as Board President, agreed to steer work from the Board of Education to the CW. Between on or about on May 1, 2019, and on or about June 17, 2019, the CW met with Thomas on several occasions in Jersey City. During their initial meeting, Thomas stated that he was running for re-election for Board President in 2019 and for Jersey City Councilman in 2021. For his re-election campaign as Board President, Thomas requested \$35,000 to \$45,000 in financial contributions from the CW. For the Jersey City Councilman campaign, Thomas requested approximately \$75,000 in financial contributions from the CW. At a second meeting with Thomas, the CW stated that he could provide the requested financial support, but in return, the CW wanted to receive work from the Jersey City Board of Education. Thomas agreed and indicated that the CW would be hired as the Jersey City Board of Education's real estate advisor. Specifically, the CW stated, "Make me Special Counsel for..." Thomas then stated, "Real estate...that's perfect. Yeah, nobody questions anything...nobody questions all of that stuff." At a third meeting with Thomas, the CW thanked Thomas for the anticipated work from the school board and handed Thomas an envelope containing \$10,000 in cash. Thomas accepted the envelope after the CW had previously stated that that he could provide the requested financial support, but in return, the CW wanted and expected to receive work from the Jersey City Board of Education. Further information on related complaint.

Affidavit of Probable Cause

Affidavit of Probable Cause

COMPLAINT NUMBER

THE STATE OF NEW JERSEY

1424

S

2019

000401

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

VS.

SUDHAN M THOMAS

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

Recordings made during investigation and statements made from defendant and conconspirator

3. If victim was injured, provide the extent of the injury:

N/A

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: ROSS PORTNER LAW ENFORCEMENT OFFICER

Date: 12/19/2019

Affidavit of Probable Cause

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1/1/2017

Preliminary Law Enforcement Incident Report

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> <i>VS.</i> SUDHAN M THOMAS	
1424	S	2019	000401	ADDRESS:	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
MORRISTOWN MUNICIPAL COURT P.O. BOX 150 MORRISTOWN NJ 07963-0150 973-292-6687 COUNTY OF: MORRIS				 	
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 201906207		DEFENDANT INFORMATION SEX: EYE COLOR: DOB: DRIVER'S LIC. # DL STATE: SOCIAL SECURITY # SBI #: TELEPHONE #: LIVSCAN PCN #:	
COMPLAINANT NAME: ROSS		PORTNER			
25 MARKET ST		NJ 08625			
P O BOX 085		TRENTON			

Purpose: The Preliminary Law Enforcement Incident Report (PLEIR) is intended to document basic information known to the officer at the time of its preparation. It is recognized that additional relevant information will emerge as an investigation continues. The PLEIR shall be in addition to, not in lieu of, any regular police arrest, incident, or investigation reports. Note that the PLEIR is specific to each defendant charged in an investigation.

- The defendant made statements/admissions.
 - It was recorded using:
 - *Audio recording only
 - *Officer's written notes/Report
 - *Other/Explain digital recording device

- The offense/incident was recorded using electronic/surveillance via:
 - Other/Explain digital recording device

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: ROSS PORTNER LAW ENFORCEMENT OFFICER Date: 12/19/2019