

**LAW OFFICE OF ANGEL HECTOR, LLC**

Angel Hector, Esq. (Attorney ID No. 248832017)

P.O. Box 6081

Hoboken, New Jersey 07030

ahector@angelhectorlaw.com

201-250-4239

Attorney for Plaintiff, Hector and Alonso for Assembly

<p>HECTOR AND ALONSO FOR ASSEMBLY,</p> <p>Plaintiff,</p> <p>-vs-</p> <p>HUDSON COUNTY BOARD OF ELECTIONS,</p> <p>Defendant</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION, HUDSON COUNTY</p> <p>DOCKET NO. HUD-L-____-25</p> <p>VERIFIED COMPLAINT IN LIEU OF PREROGATIVE WRIT</p>
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1. Hector and Alonso for Assembly (hereinafter “Plaintiff”) brings this action in lieu of a prerogative writs pursuant to Rule 4:69-1 against the Hudson County Board of Elections, due to the board’s rejection of Plaintiff’s request for additional polling places along the River Road corridor of Guttenberg, North Bergen, Weehawken, and West New York due to population growth and accessibility concerns which will only cause the disenfranchisement of the registered voters of that area.

**THE PARTIES**

2. Plaintiff, Hector and Alonso for Assembly, is a committee consisting of Miguel A. Hector and Frank Alonso. These individuals are certified candidates for State Assembly in the 33rd Legislative District of New Jersey (hereinafter “LD-33”), which includes Guttenberg, North Bergen, Secaucus, Union City, Weehawken, and West New York. The primary election is on June 10, 2025.

3. Defendant, Hudson County Board of Elections, is named as a defendant due to its role in the determination of polling locations and overall management of the relevant election N.J.S.A. 19:8-3.

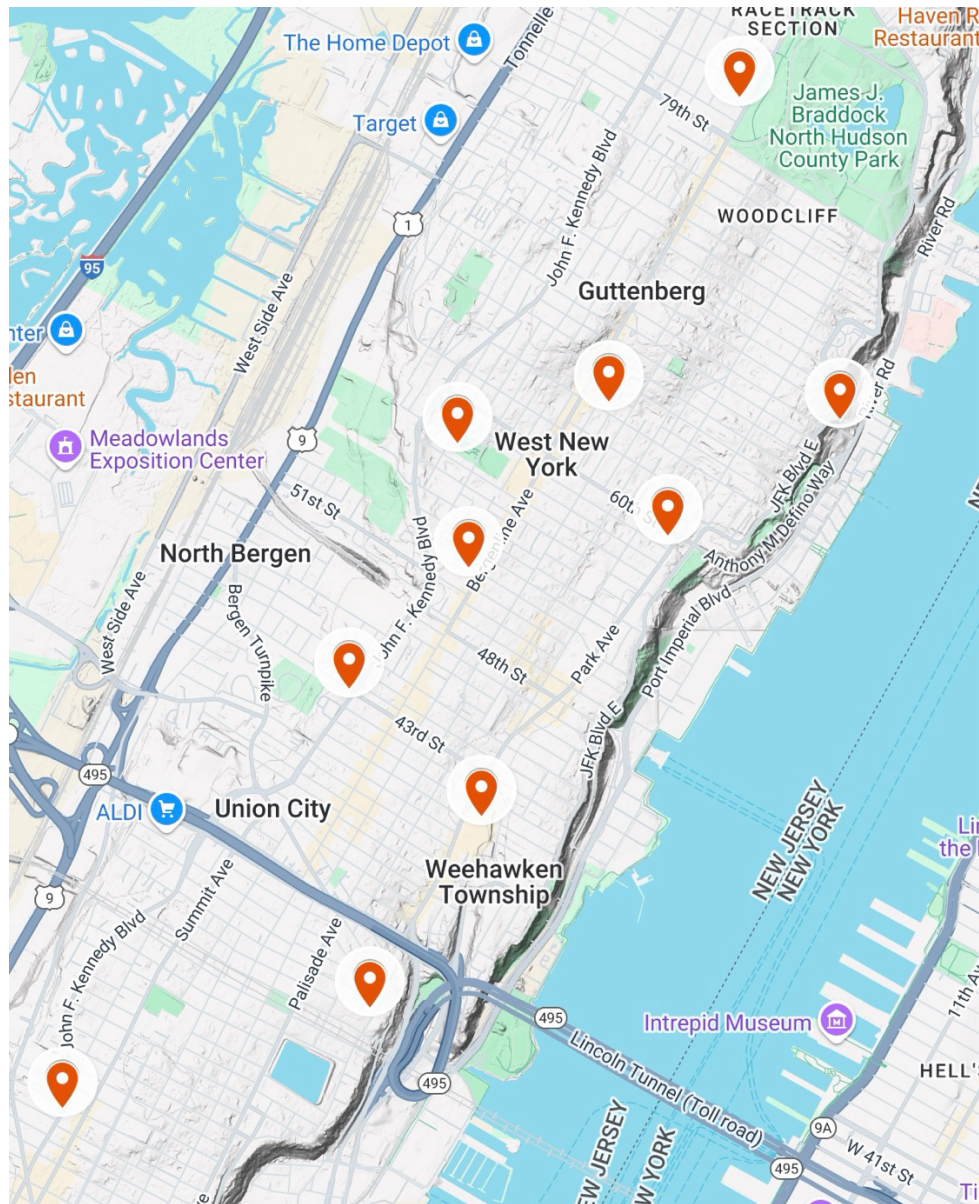
#### **FACTS COMMON TO ALL COUNTS**

4. On April 29, 2025, Plaintiff requested the creation of additional polling places along the waterfront communities along River Road in Guttenberg, North Bergen, Weehawken, and West New York, which has experienced significant population growth and caused accessibility concerns for registered voters. **See Exhibit A attached hereto.**
5. On May 2, 2025, Defendant admitted “that the significant population growth along Hudson County’s waterfront from Guttenberg to Harrison does merit consideration of changing district lines and polling locations.” **See Exhibit B attached hereto.**
6. However, Defendant denied this request, citing expired deadlines for both the readjustment in district lines and the selection and inspection of additional early voting sites.
7. Defendant also noted three (3) early voting sites were added in North Bergen and one (1) in Weehawken.
8. Finally, Defendant stated it would also recommend denial of the request at the Board’s next regularly scheduled meeting, but it would recommend the addition at the November General Election and all elections moving forward.
9. Defendant’s failure to establish polling locations disproportionately impacts voters residing in LD-33’s waterfront communities, denying them equal access to vote.
10. There are 127,031 registered voters in LD-33. A breakdown of the registered voters and early voting locations in North Bergen, Weehawken, West New York, and Union City is noted in **Table A** below:

**Table A:**

Municipality	Registered Voters	Early Voting Locations
North Bergen	33,873	3
Union City	29,044	10
Weehawken	9766	2
West New York	21,217	4

11. Despite the number of registered voters for each municipality, Union City's polling locations (10) nearly match the total number of polling places (11) for the remaining municipalities in the district.
12. Additionally, these early voting locations are all mobile trailers which by their very nature grant easier access to voters in Union City.
13. The polling places for North Bergen, Weehawken, and West New York are more inland and atop the cliffs of Palisades Avenue which make them difficult for residents of the waterfront to access:



14. There are approximately 8,000 registered voters that occupy the waterfront and must navigate around the Palisades Cliffs, as noted above, in order to vote. The dark line in the map above represents the terrain of the Palisades Cliffs.

15. This clearly creates an advantage for Union City voters to obtain access to vote as opposed to other residents of the district, specifically those residents of the waterfront.

16. Pursuant to N.J.S.A. 19:8-4, the Hudson County Board of Elections has until May 14, 2025 to certify polling places.

**COUNT ONE**  
**Writ of Mandamus**

17. Plaintiff restates all preceding statements as though fully set forth herein.
18. The polling places for residents of the waterfront are vastly more inconvenient than other residents of the district, and more early voting locations to be added prior to the June 10, 2025 primary election are required.
19. Under N.J.S.A. 19:8-2 and -3, the Board of Elections is to give preference to schoolhouses and other buildings when determining polling locations.
20. However, the Board of Elections is required to also consider the convenience of the polling location to the voters in the district. Pursuant to N.J.S.A. 19:8-3, "The county board may select a polling place other than a schoolhouse or public building for an election district, when the location of the election district and of the schoolhouses and public buildings in the municipality in which the election district is located, is such that inconvenience would be caused [to] the voters of such election district by locating the polling place thereof in a schoolhouse or public building."
21. As described herein, the current state of early voting locations greatly inconveniences the voters who reside on the waterfront while the residents of Union City have a substantial advantage due to the sheer number and mobility of its polling locations.
22. The denial of additional polling places in high-growth areas violate the constitutional principle of "one person, one vote" if it results in unequal access to voting.
23. Under Reynolds, administrative deadlines cannot justify restrictions on voting rights without a compelling state interest. N.J.S.A. 19:15A-1 and N.J.S.A. 19:4-14 explicitly authorizes county boards to adjust polling locations and district boundaries to reflect

population changes—tools that should be used to ensure equal access and uphold voters' constitutional rights. Reynolds v. Sims, 377 U.S. 533 (1964).

24. Defendant has already admitted that Plaintiff's concerns are valid and should be considered in the general election and elections moving forward, but will not make the same changes prior to the primary election even though the polling places are not yet certified.

25. Defendant's failure to create additional polling places along the waterfront will surely disenfranchise voters and violate the principle of "one person, one vote".

WHEREFORE, Plaintiff demands relief and the issuance of an Order in Lieu of Prerogative Writ directing Defendant to reconsider its decision and create additional polling places for residents of the waterfront, specifically, at least three new in-person polling places to be established on the River Road corridor in Guttenberg, North Bergen, Weehawken, and West New York and at least one (1) Early Voting polling place to be established on River Road in time for the upcoming Primary Election on June 10, 2025. Additionally, Plaintiff demands an Order directing Defendant to post signage to that effect at all polling locations, and granting Plaintiff all other **legal and equitable relief as this Court finds just and proper.**

#### **Designation of Trial Counsel**

Angel Hector, Esq., attorneys for Plaintiff, is hereby designated as trial counsel under R. 4:25-4.

#### **N.J. Rule 4:5-1 Certification**

I certify that I am not aware of any other pending action in any court or pending arbitration proceeding or that any other action or arbitration is contemplated.

LAW OFFICE OF ANGEL HECTOR, LLC  
Attorney for Plaintiff

A handwritten signature in black ink, appearing to read 'Angel Hector', is written over a light gray rectangular background.

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ANGEL HECTOR

DATED: May 8, 2025

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**VERIFICATION OF MIGUEL A. HECTOR**

I, Miguel A. Hector, of full age, certifies as follows:

On behalf of Hector and Alonso for Assembly, the Plaintiff in the above-referenced action, I have personal knowledge of the facts and circumstances giving rise to this action. I have read the contents of the annexed Verified Complaint and state that they are true to the best of my knowledge, information, and belief. Pursuant to Rule 1:4-7, I intend this certification to constitute a verification of the Complaint in this matter.

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.

**/s/Miguel A. Hector**

Miguel A. Hector on Behalf of Hector and  
Alonso for Assembly

DATED: May 8, 2025



# EXHIBIT A

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Hector and Alonso for Assembly  
1807 Kennedy Boulevard, Apt. 1F  
North Bergen, NJ 07047

April 29, 2025

Mr. Michael Harper  
Hudson County Board of Elections  
257 Cornelison Avenue  
Jersey City, NJ 07302

Dear Mr. Harper:

As candidates for State Assembly, we write to you today to formally request your assistance in ensuring that all voters in the 33rd Legislative District have an equal opportunity to exercise their right to vote in the upcoming Democratic Primary election. In order to meet that critical goal, we are demanding that the Hudson County Board of Elections move immediately to establish polling places located within the waterfront communities along River Road in Weehawken, West New York, Guttenberg and North Bergen.

Despite there being significant population growth along the Hudson County riverfront in recent years, no efforts have been made to help ensure that residents in this area have access to polling places located within their neighborhoods. Instead, the political machine has taken the opposite approach and tried to disenfranchise these residents by putting up unnecessary barriers to voting. In order to rectify this situation, we hereby call for the following:

- At least three new in-person polling places to be established on River Road located in Weehawken, West New York, and North Bergen/Guttenberg.
- At least one Early Voting polling place to be established on River Road in time for the upcoming Primary Election

All American citizens must be afforded the opportunity to vote in this critical election, and we expect the Hudson County Board of Elections to operate impartially and not bow down to pressure from machine politicians. We are available to discuss this important matter at your convenience, and we request an immediate response.

Thank you for your consideration,

Tony Hector and Frank Alonso  
Democratic Candidates for Assembly, 33rd District

# EXHIBIT B

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# Hudson County

## BOARD OF ELECTIONS

May 2, 2025

Gentlemen,

Thank you, for your correspondence and your recommendations regarding early and election day polling locations. The Hudson County Board of Elections strives to provide convenient and accessible polling locations to all county voters. It is a responsibility which we take seriously, and we welcome the input and assistance of everyone - candidate, elected official and private citizen, alike - in finding and procuring locations that work for everyone.

I agree with you that the significant population growth along Hudson County's waterfront from Guttenberg to Harrison does merit consideration of changing district lines and polling locations. Regrettably, deadlines have passed for both the readjustments of district lines (necessary to add waterfront polling locations, as State law prohibits more than one polling site per district) and the selection and inspection of additional early voting sites.

Municipal Clerks were offered the opportunity to request early voting locations prior to March 31<sup>st</sup> of this year. In fact, additional early voting locations were added, three in North Bergen and one more in Weehawken. Averaging an Early Voting Center nearly every 1.5 square miles (32 EVC's, 46.19 sq miles), Hudson County leads the State in the availability and convenience in Early Voting locations.

I have shared your request with the Commissioners of the Board of Elections prior to our May 21<sup>st</sup> regularly scheduled meeting, but again, for both practical and legal reasons, will be recommending that they deny your requests at this time.

I will be suggesting that they consider the addition of a waterfront early voting center for use in the November General Election and all elections moving forward. I would greatly appreciate any suggestions or ideas for suitable locations that you may have.

Regards,

Michael Harper

Daniel Miqueli  
*Chairperson*

Aimee Focaraccio  
*Secretary*

Paul Castelli  
*Member*

John Minella  
*Member*

Jose Arango  
*Member*

Janet Larwa  
*Member*

Michael H. Harper  
*Clerk*