

RESOLUTION NO. 2024-257

RESOLUTION OF THE TOWNSHIP OF LITTLE EGG HARBOR, COUNTY OF OCEAN, STATE OF NEW JERSEY, APPROVING CHARGES FOR THE DEMOLITION OF 110 NATIONAL UNION BOULEVARD, PURSUANT TO CHAPTER 148 AND AUTHORIZING SAID CHARGE TO BECOME A LIEN AND TO BE ADDED TO AND BECOME A PART OF THE TAXES TO BE ASSESSED AND LEVIED ON SAID PROPERTY

WHEREAS, Chapter 148 of the Little Egg Harbor Township Code provides for the repair, closing and demolition of structures within the Township which are unsafe and unfit for human habitation; and

WHEREAS, in accordance with the terms of N.J.S.A. 40:48-2.4 et seq. and Chapter 148 of the Township Code, the Township provided notice and opportunity to the property owner of a hearing regarding the condition of the building and premise at 110 National Union Boulevard, determined said building was unfit for human habitation, occupancy or use and issued an order setting forth the reasons for the decision and requiring the repair, alteration or improvement of said building or ordering its demolition if left in a state of disrepair; and

WHEREAS, said owner failed to comply with the order to repair or demolish;
and

WHEREAS, the Township filed a Verified Complaint in Superior Court of New Jersey, Chancery Division, Ocean County, Docket No. OCN-C-194-23 and the Honorable Mark A. Troncone, P.J.Ch. executed an Order that the Township should act to abate the nuisance and that any and all funds expended to abate the nuisance shall become a Municipal Lien against the Defendant's real property; and

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Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.
ATTORNEYS AT LAW

98 East Water Street
Toms River, NJ 08753

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WHEREAS, the building was demolished by the Township pursuant to said Court Order, hereto attached as Schedule A; and

WHEREAS, it is the desire of the Township to place liens against the property, to provide reimbursement to the Township for the costs of demolition as set forth herein.

NOW, THEREFORE, BE IT RESOLVED, by the governing body of the Township of Little Egg Harbor, County of Ocean, State of New Jersey as follows:

1. That the following charge has been found to be correct and the cost as shown shall be charged against such property:

Block 325.26, Lot 30	110 National Union Blvd.	\$21,523.00
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The amount so charged shall forthwith become a lien upon such land and shall be added to and become a part of the taxes next to be assessed and levied upon such lands, the same to bear interest at the same rate as taxes and shall be collected and enforced by the Township of Little Egg Harbor Tax Collector.

2. That the Township Clerk is hereby authorized and directed to file a statement of the amount due the Township for the cost of demolition, along with a copy of this Resolution, with the Tax Collector of the Township of Little Egg Harbor.

3. That the Tax Collector shall file, by registered mail, with the owners of said property and parties in interest a copy of the municipal lien certificate.

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CERTIFICATION

I, **KELLY LETTERA, CMC, RMC**, Municipal Clerk of the Township of Little Egg Harbor do hereby certify that the foregoing resolution was duly adopted by the Township of Little Egg Harbor Township Committee at a meeting held on this **10th** day of **October, 2024**.



KELLY LETTERA, CMC, RMC
Township Clerk
Little Egg Harbor Township

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ROTHSTEIN, MANDELL, STROHM, HALM & CIPRIANI, P.A.

Danielle A. Rosiejka, Esq. Attorney ID No.: 022982012

98 East Water Street

Toms River, New Jersey 08753

Attorney for Plaintiff, Township of Little Egg Harbor

TOWNSHIP OF LITTLE EGG HARBOR,	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION, OCEAN COUNTY
Plaintiff,	
v.	DOCKET NO. OCN-C- CIVIL ACTION
ARTURO CAMPOS A/K/A ARTURO CAMPOS DIAZ; RICHARD LEONARDIS; JOHN AND JANE DOES 1-10; ABC LLC's 1-10; and ZYZ CORPS 1-10.	VERIFIED COMPLAINT
Defendant.	

The Township of Little Egg Harbor, a municipal corporation of the State of New Jersey, with its principal place of business located at 665 Radio Road, Little Egg Harbor, New Jersey, by way of Verified Complaint against Defendants says:

COUNT I

1. The Plaintiff, Township of Little Egg Harbor, (the "Township") is a municipal corporation of the State of New Jersey.
2. Defendant Arturo Campos ("Defendant" or "Campus") is the record owner of real property located within the Township and commonly known as 110 National Blvd., Little Egg Harbor, New Jersey, designated as Block 325.26, Lot 30, on the Tax Map of the Township of Little Egg Harbor (the "Property").
3. Defendant Richard Leonardis, ("Defendant Leonardis" or "tax sale certificate holder" has been added to the Complaint for convenience purpose. Defendant Leonardis is the



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holder of Tax Sale Certificate number 17-00224 affecting the Property, which certificate is dated December 20, 2017, and was recorded in the offices of the Ocean County Clerk/Register on August 1, 2018 in mortgage book 17195 at page 274.

4. On or about June 6, 2022; July 11, 2022; September 6, 2022; November 04, 2022; December 16, 2022; January 30, 2023; March 28, 2023; April 27, 2023; June 6, 2023; August 14, 2023; September 20, 2023; October 31, 2023; and November 17, 2023, code enforcement for the Borough, inspected the Property and determined the Property was structurally unsound. See Certification of Michael Fromosky at ¶ 3-4 and Exhibit B.

5. In addition to being structurally unsound, the building is dilapidated and in disrepair. The structure suffers from severe storm and water damage. There are multiple issues with the foundation, roofing, and the exterior walls. Parts of the roof of have completely collapsed leaving the interior of the property open to the elements. The interior of the Property continues to deteriorate and is collapsing upon itself due to exposure to the elements. The property is unsecure. Windows on the property are broken and allow access to the inside of the property. The walls inside the property are covered by black mold. The Property is ripe for vagrants, suffers from unsanitary conditions, and is an attractive nuisance for children. This Property lays vacant, suffers from significant mold, and continuous flooding issues. See Certification of Michael Fromosky at ¶ 3-6, See also Exhibit A-B.

6. The Township of Little Egg Harbor put Defendants on notice of an administrative hearing that was to take place on October 17, 2023. See Certification of Michael Fromosky at ¶ 7; See also Exhibit C.

7. Notice of the October 17, 2023 administrative hearing was sent by certified and regular mail to the Property address, Defendant's last known address; posted on the property

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address; and published in the Asbury Park Press on September 30, 2023. See Certification of Michael Fromosky at ¶ 7; See also Exhibit C.

8. On October 17, 2023, Michael Fromosky, Code Enforcement Officer for the Township of Little Egg Harbor and Danielle A. Rosiejka, Esq., Municipal Attorney for Little Egg Harbor Township conducted an administrative hearing pursuant to N.J.S.A. 40:48-2.5(b). Defendants did not attend the hearing. See Certification of Michael Fromosky at ¶ 8-9.

9. An opinion was crafted from the hearing that took place. On November 6, 2023, the Township mailed the administrative opinion by certified and regular mail to the Property address, Defendant's last known address; posted on the property address; and published the opinion in the Asbury Park Press on November 11, 2023. See Certification of Michael Fromosky at ¶ 9; See also Exhibit D.

10. To the Township's knowledge, no work has been performed on the Property other than minor debris remediation and grass cutting since becoming substantially damaged.

11. The structure is and at all times described herein vacant and unoccupied.

12. As a result of the Defendant's failure to correct or demolish the unsafe condition, the structure constitutes an imminent hazard to the safety and welfare of the surrounding neighborhood. The Township is concerned that this home could be used by vagrants and is an attractive nuisance for children.

9. Pursuant to N.J.S.A. 40:48-2.3, whenever a municipality finds that there exists any building which is unfit for habitation or occupancy due to conditions rendering such building dangerous or inimical to the welfare of the residents of the municipality, the municipality has the power to demolish, or to cause the demolition of the building. There is no exception to this statute for a property owned by a government agency.

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10. Pursuant to N.J.S.A. 40:48-2.5, the defendants are liable to the Township of Little Egg Harbor for the costs relating to the demolition of the unsafe structure including the cost of filing legal papers and the cost of the demolition. There is no exception to this statute for a property owned by a government agency.

11. Pursuant to N.J.S.A. 40:48-2.5, the municipality may seek a judgment in summary proceedings for the demolition of a structure if it poses an actual and immediate danger to life by the threatened collapse of any structurally unsafe building. There is no exception to this statute for a property owned by a government agency.

WHEREFORE, Plaintiff, Township of Little Egg Harbor, demands judgment against the Defendant:

A. Authorizing the demolition of the structure located at 110 National Blvd., Little Egg Harbor, New Jersey, designated as Block 325.26, Lot 30, on the Tax Map of the Township of Little Egg Harbor.

B. Ordering that the cost of the filing of legal papers, search fees, and advertising charges incurred during the course of this proceeding and the demolition, including man-hours, equipment, and disposal fees, be assessed against the property as a Municipal Lien.

C. Seeking Attorney's Fees and costs of this suit.

D. Other and further relief as the Court may deem just and equitable.

DESIGNATION OF TRIAL COUNSEL

Pursuant to N.J. Ct. R. 4:25-4, Danielle A. Rosiejka, Esq., has been designated as trial counsel in connection with the above referenced matter.

CERTIFICATION OF COMPLIANCE WITH RULE 1:38-7I

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I certify that confidential personal identifiers have been redacted from documents now submitted to the Court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

CERTIFICATION

Pursuant to Rule 4:5-1, upon belief and based on information known to the undersigned at the time of the filing of this pleading, there are no other actions or arbitrations related to this suit which are pending or presently contemplated other than a Tax Sale Foreclosure initiated by Defendant Leonardis under docket number F-13488-22.

**ROTHSTEIN, MANDELL, STROHM,
HALM & CIPRIANI**
*Attorneys for Plaintiff, Township of Little Egg
Harbor*

Date: 12/14/2023

Danielle A. Rosiejka

DANIELLE A. ROSIEJKA
For the Firm

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Halm & Cipriani, P.A.
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VERIFICATION

MICHAEL FROMOSKY, of full age, verifies and says:

1. I am the Code Enforcement Official for Little Egg Harbor Township, the Plaintiff on this application.

2. I have reviewed the annexed Verified Complaint and hereby verify that all of the factual statements contained in the Verified Complaint are true except as to any matters set forth on information and belief; as to any matters set forth on information and belief, I believe such matters to be true.

3. I certify that all the statements by me set forth in the Verification are true. I am aware that if any of the statements made by me in this Verification are willfully false, I am subject to punishment.

Dated:

12/14/23


MIKE FROMOSKY

CODE ENFORCEMENT OFFICIAL
FOR LITTLE EGG HARBOR
TOWNSHIP

ROTHSTEIN, MANDELL, STROHM, HALM & CIPRIANI, P.A.

Danielle A. Rosiejka, Esq. Attorney ID No.: 022982012

98 East Water Street

Toms River, New Jersey 08753

Attorney for Plaintiff, Township of Little Egg Harbor

<p>TOWNSHIP OF LITTLE EGG HARBOR,</p> <p>Plaintiff,</p> <p>v.</p> <p>ARTURO CAMPOS A/K/A ARTURO CAMPOS DIAZ; RICHARD LEONARDIS; JOHN AND JANE DOES 1-10; ABC LLC's 1-10; and ZYZ CORPS 1-10.</p> <p>Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION, OCEAN COUNTY</p> <p>DOCKET NO. OCN-C- CIVIL ACTION</p> <p>CERTIFICATION OF MICHAEL FROMOSKY</p>
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I, **MIKE FROMOSKY**, of full age hereby certifies as follows:

1. I am the Code Enforcement Official for Little Egg Harbor Township and I am familiar with the matters contained in this certification.

2. I became aware of the illegal conditions at 110 National Blvd., Little Egg Harbor, New Jersey, designated as Block 325.26, Lot 30, (hereinafter the "Property") and inspected the Property on several occasions.

3. I inspected the Property on or about on or about June 6, 2022; July 11, 2022; September 6, 2022; November 04, 2022; December 16, 2022; January 30, 2023; March 28, 2023; April 27, 2023; June 6, 2023; August 14, 2023; September 20, 2023; October 31, 2023; and November 17, 2023. Attached hereto as **Exhibit A** are true and accurate copies of inspection violation notices from September 6, 2022; November 04, 2022; January 30, 2023; March 28,



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2023; April 27, 2023; June 6, 2023; September 20, 2023; October 31, 2023; and November 17, 2023.

4. The Property was found to be structurally unsound, dilapidated and in disrepair. The structure suffers from severe storm and water damage. There are multiple issues with the foundation, roofing, and the exterior walls. Parts of the roof of have completely collapsed leaving the interior of the property open to the elements. The interior of the Property continues to deteriorate and is collapsing upon itself due to exposure to the elements. The property is unsecure. Windows on the property are broken and allow access to the inside of the property. The walls inside the property are covered by black mold. The Property is ripe for vagrants, suffers from unsanitary conditions, and is an attractive nuisance for children. This Property lays vacant, suffers from significant mold, and continuous flooding issues.

5. At no point did the Property Owner try to remediate the damages on the Property.

6. This Property lays vacant, suffers from significant mold, and continuous flooding issues due to the multiple issues with the foundation, roofing and exterior walls. Attached hereto as **Exhibit B** are true and accurate copies of photos taken of the property on December 16, 2022 and October 31, 2023.

7. On or about September 13, 2023, the Township of Little Egg Harbor put all current rights holders on notice that an administrative hearing was to take place on October 17, 2023. Notice of the hearing was sent by regular and certified mail to Defendants' new address as well as the property address. Notice of the hearing was posted on the property address and was published in the Asbury Park Press on September 30, 2023. Attached hereto as **Exhibit C** are true and accurate copies of correspondence from Danielle A. Rosiejka, Esq., to Defendants notifying them of the hearing and the affidavit of publication.

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8. On October 17, 2023, Danielle A. Rosiejka, Esq., Municipal Attorney for Little Egg Harbor Township and I conducted an administrative hearing pursuant to N.J.S.A. 40:48-2.5(b). The Defendants did not attend the hearing.

9. On November 6, 2023, the Township mailed the administrative opinion by certified and regular mail to the Property address, Defendant's last known address; posted on the property address; and published the opinion in the Asbury Park Press on November 11, 2023. Attached hereto as **Exhibit D** are true and accurate copies of correspondences from Danielle A. Rosiejka, Esq., to Defendants notifying him of the administrative opinion and the affidavit of publication.

10. The Property has been vacant and in disrepair for over five years. In 2018 I inspected the property on several occasions and prepared a certification following an administrative hearing that took place on August 31, 2018. Attached hereto as **Exhibit E** is a true and accurate copy of my certification and photos taken of the property in 2018. As evidenced from the photos, the property has continued to deteriorate over the years without any remediation.

11. The dangerous condition persists on the Property. The structure is an imminent hazard to the safety and welfare of the surrounding neighborhood. The Township needs to demolish this structure as unsafe in order to protect the health, safety and welfare of the residents of the Township.

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CERTIFICATION

I hereby 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.

Dated: 12/14/23



**MIKE FROMOSKY
CODE ENFORCEMENT OFFICIAL**

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EXHIBIT A



Little Egg Harbor Township
Code Enforcement
 665 Radio Road
 Little Egg Harbor Township, NJ 08087
 (609) 296-7241

9/6/2022

Inspected: Tenant Owner

CAMPOS, ARTURO
 499 MAIN ROAD
 VINELAND, NJ 08360

VIOLATION NOTICE

Block 325.26 Lot 30 Qualifier _____ 110 NATIONAL UNION BLVD.
 Inspector Mike Fromosky

Inspection Notes

Follow up of previous violations on abandoned properties revealed that this property still has violations pending. This property has been on the Township demo list for a few years now and must be completed.

06/06/22 No improvement noted. Work order issued.

07/11/22 No improvement noted, other than the results of the work order. The demo process has to continue to remediate this problem properly.

09/06/22 No improvement noted. The demo process will continue, but the lien holder is trying to foreclose.

You are hereby notified that a code official inspected the above referenced premises and determined that there is a violation of the municipal code. The violation listed below must be completed prior to the violation abatement date indicated. Failure to obey this order of the code official shall result in the issuance of a summons resulting in a mandatory court appearance and possible penalty assessment in compliance with this code.

Tracking #	Violations Resulting From This Inspection		
CVIO-22-1653400541	Date 5/24/2022	Compliance Date 11/4/2022	Status OPEN
{ Location Structure Statute : § 303.7 Roofs and drainage Summary Roofs and flashing shall be maintained sound and tight having no defects to admit rain. Drains, gutters, and downpours shall be in good repair and not discharge in a manner that creates a public nuisance.			
CVIO-22-1653400551	Date 5/24/2022	Compliance Date 11/4/2022	Status OPEN
{ Location Yard Statute : § 302.4.1 Grass & Weeds. Summary Grass and weeds must be maintained below 10 inches on the entire property.			
CVIO-22-1653400556	Date 5/24/2022	Compliance Date 11/4/2022	Status OPEN
{ Location Structure Statute : § 303.6 Exterior walls Summary Exterior walls shall be free from holes, breaks, loose or rotting materials and maintained weatherproof.			
CVIO-22-1653400546	Date 5/24/2022	Compliance Date 11/4/2022	Status OPEN
{ Location Yard Statute : § 301.3 Vacant structures and land. Summary Vacant structure and property must be maintained clean, safe, and sanitary.			

CVIO-22-1653400536

Date 5/24/2022 Compliance Date 11/4/2022

Status OPEN

{ Location Structure

{ Statute Unfit Housing : § 108.1.3 Unfit Housing

Summary House is in complete disrepair. It has substantial water damage and is uninhabitable.

If you have questions regarding the status or nature of a violation please contact the department at
(609) 296-7241

Mike Fromosky - 609-296-7241 Ext. 617



Little Egg Harbor Township
 Code Enforcement
 665 Radio Road
 Little Egg Harbor Township, NJ 08087
 (609) 296-7241

11/4/2022

Inspected: Tenant Owner

CAMPOS, ARTURO
 499 MAIN ROAD
 VINELAND, NJ 08360

VIOLATION NOTICE

Block 325.26 Lot 30 Qualifier _____ 110 NATIONAL UNION BLVD.
 Inspector Mike Fromosky

Inspection Notes

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06/06/22 No improvement noted. Work order issued.

07/11/22 No improvement noted, other than the results of the work order. The demo process has to continue to remediate this problem properly.

09/06/22 No improvement noted. The demo process will continue, but the lien holder is trying to foreclose.

11/04/22 No improvement noted. We will continue to work towards a court ordered demolition.

You are hereby notified that a code official inspected the above referenced premises and determined that there is a violation of the municipal code. The violation listed below must be completed prior to the violation abatement date indicated. Failure to obey this order of the code official shall result in the issuance of a summons resulting in a mandatory court appearance and possible penalty assessment in compliance with this code.

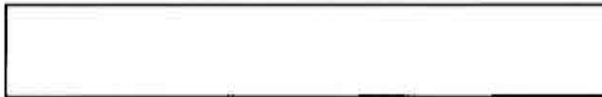
Tracking #	<u>Violations Resulting From This Inspection</u>			Status	
CVIO-22-1653400541	Date	5/24/2022	Compliance Date	12/16/2022	OPEN
{ Location Structure Statute : § 303.7 Roofs and drainage Summary Roofs and flashing shall be maintained sound and tight having no defects to admit rain. Drains, gutters, and downpours shall be in good repair and not discharge in a manner that creates a public nuisance.					
CVIO-22-1653400551	Date	5/24/2022	Compliance Date	12/16/2022	OPEN
{ Location Yard Statute : § 302.4.1 Grass & Weeds. Summary Grass and weeds must be maintained below 10 inches on the entire property.					
CVIO-22-1653400556	Date	5/24/2022	Compliance Date	12/16/2022	OPEN
{ Location Structure Statute : § 303.6 Exterior walls Summary Exterior walls shall be free from holes, breaks, loose or rotting materials and maintained weatherproof.					
CVIO-22-1653400546	Date	5/24/2022	Compliance Date	12/16/2022	OPEN

{ Location Yard
Statute : § 301.3 Vacant structures and land.
Summary Vacant structure and property must be maintained clean, safe, and sanitary.

CVIO-22-1653400536 Date 5/24/2022 Compliance Date 12/16/2022 Status OPEN

{ Location Structure
Statute Unfit Housing : § 108.1.3 Unfit Housing
Summary House is in complete disrepair. It has substantial water damage and is uninhabitable.

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 Little Egg Harbor Township, NJ 08087
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1/30/2023

Inspected: Tenant Owner

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VIOLATION NOTICE

Block 325.26 Lot 30 Qualifier _____ 110 NATIONAL UNION BLVD.
 Inspector Mike Fromosky

Inspection Notes

Follow up of previous violations on abandoned properties revealed that this property still has violations pending. This property has been on the Township demo list for a few years now and must be completed.

06/06/22 No improvement noted. Work order issued.

07/11/22 No improvement noted, other than the results of the work order. The demo process has to continue to remediate this problem properly.

09/06/22 No improvement noted. The demo process will continue, but the lien holder is trying to foreclose.

11/04/22 No improvement noted. We will continue to work towards a court ordered demolition.

12/16/22 No improvement noted. Continue with the demo process.

01/30/23 No improvement noted. Continue with the demo process despite the latest claim from Mr. Leonardis.

You are hereby notified that a code official inspected the above referenced premises and determined that there is a violation of the municipal code. The violation listed below must be completed prior to the violation abatement date indicated. Failure to obey this order of the code official shall result in the issuance of a summons resulting in a mandatory court appearance and possible penalty assessment in compliance with this code.

Tracking #	<u>Violations Resulting From This Inspection</u>		
CVIO-22-1653400541	Date 5/24/2022	Compliance Date 3/28/2023	Status OPEN
{ Location Structure Statute : § 303.7 Roofs and drainage Summary Roofs and flashing shall be maintained sound and tight having no defects to admit rain. Drains, gutters, and downpours shall be in good repair and not discharge in a manner that creates a public nuisance.			
CVIO-22-1653400551	Date 5/24/2022	Compliance Date 3/28/2023	Status OPEN
{ Location Yard Statute : § 302.4.1 Grass & Weeds. Summary Grass and weeds must be maintained below 10 inches on the entire property.			
CVIO-22-1653400556	Date 5/24/2022	Compliance Date 3/28/2023	Status OPEN
{ Location Structure			

{ Statute : § 303.6 Exterior walls
Summary Exterior walls shall be free from holes, breaks, loose or rotting materials and maintained weatherproof.

CVIO-22-1653400546 Date 5/24/2022 Compliance Date 3/28/2023 Status OPEN

{ Location Yard
Statute : § 301.3 Vacant structures and land.
Summary Vacant structure and property must be maintained clean, safe, and sanitary.

CVIO-22-1653400536 Date 5/24/2022 Compliance Date 3/28/2023 Status OPEN

{ Location Structure
Statute Unfit Housing : § 108.1.3 Unfit Housing
Summary House is in complete disrepair. It has substantial water damage and is uninhabitable.

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Mike Fromosky - 609-296-7241 Ext. 617



Little Egg Harbor Township
 Code Enforcement
 665 Radio Road
 Little Egg Harbor Township, NJ 08087
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3/28/2023

Inspected: Tenant Owner

CAMPOS, ARTURO
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 VINELAND, NJ 08360

VIOLATION NOTICE

Block 325.26 Lot 30 Qualifier _____ 110 NATIONAL UNION BLVD.
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Inspection Notes

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07/11/22 No improvement noted, other than the results of the work order. The demo process has to continue to remediate this problem properly.

09/06/22 No improvement noted. The demo process will continue, but the lien holder is trying to foreclose.

11/04/22 No improvement noted. We will continue to work towards a court ordered demolition.

12/16/22 No improvement noted. Continue with the demo process.

01/30/23 No improvement noted. Continue with the demo process despite the latest claim from Mr. Leonardis.

03/28/23 No improvement noted, in fact the property continues to deteriorate. Mr. Leonardis, requested that the town stop pursuing the demo, but he has not done anything to remediate this property. Continue with the demo process and let Mr. Leonardis make his argument in court.

You are hereby notified that a code official inspected the above referenced premises and determined that there is a violation of the municipal code. The violation listed below must be completed prior to the violation abatement date indicated. Failure to obey this order of the code official shall result in the issuance of a summons resulting in a mandatory court appearance and possible penalty assessment in compliance with this code.

Tracking #	<u>Violations Resulting From This Inspection</u>		
CVIO-22-1653400541	Date 5/24/2022	Compliance Date 4/27/2023	Status OPEN
{ Location FINAL NOTICE Statute : § 303.7 Roofs and drainage Summary Roofs and flashing shall be maintained sound and tight having no defects to admit rain. Drains, gutters, and downpours shall be in good repair and not discharge in a manner that creates a public nuisance.			
CVIO-22-1653400551	Date 5/24/2022	Compliance Date 4/27/2023	Status OPEN
{ Location FINAL NOTICE Statute : § 302.4.1 Grass & Weeds.			

Summary Grass and weeds must be maintained below 10 inches on the entire property.

CVIO-22-1653400556 Date 5/24/2022 Compliance Date 4/27/2023 Status OPEN

Location FINAL NOTICE

Statute : § 303.6 Exterior walls

Summary Exterior walls shall be free from holes, breaks, loose or rotting materials and maintained weatherproof.

CVIO-22-1653400546 Date 5/24/2022 Compliance Date 4/27/2023 Status OPEN

Location FINAL NOTICE

Statute : § 301.3 Vacant structures and land.

Summary Vacant structure and property must be maintained clean, safe, and sanitary.

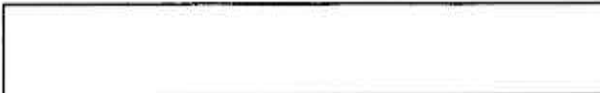
CVIO-22-1653400536 Date 5/24/2022 Compliance Date 4/27/2023 Status OPEN

Location FINAL NOTICE

Statute Unfit Housing : § 108.1.3 Unfit Housing

Summary House is in complete disrepair. It has substantial water damage and is uninhabitable.

If you have questions regarding the status or nature of a violation please contact the department at (609) 296-7241



Mike Fromosky - 609-296-7241 Ext. 617

4/27/2023



Little Egg Harbor Township
 Code Enforcement
 665 Radio Road
 Little Egg Harbor Township, NJ 08087
 (609) 296-7241

Inspected: Tenant Owner

CAMPOS, ARTURO
 499 MAIN ROAD
 VINELAND, NJ 08360

VIOLATION NOTICE

Block 325.26 Lot 30 Qualifier _____ 110 NATIONAL UNION BLVD.
 Inspector Mike Fromosky

Inspection Notes

Follow up of previous violations on abandoned properties revealed that this property still has violations pending. This property has been on the Township demo list for a few years now and must be completed.

06/06/22 No improvement noted. Work order issued.

07/11/22 No improvement noted, other than the results of the work order. The demo process has to continue to remediate this problem properly.

09/06/22 No improvement noted. The demo process will continue, but the lien holder is trying to foreclose.

11/04/22 No improvement noted. We will continue to work towards a court ordered demolition.

12/16/22 No improvement noted. Continue with the demo process.

01/30/23 No improvement noted. Continue with the demo process despite the latest claim from Mr. Leonardis.

03/28/23 No improvement noted, in fact the property continues to deteriorate. Mr. Leonardis, requested that the town stop pursuing the demo, but he has not done anything to remediate this property. Continue with the demo process and let Mr. Leonardis make his argument in court.

04/27/23 No improvement noted. Continued deterioration of the property. Continue to pursue the demo process.

You are hereby notified that a code official inspected the above referenced premises and determined that there is a violation of the municipal code. The violation listed below must be completed prior to the violation abatement date indicated. Failure to obey this order of the code official shall result in the issuance of a summons resulting in a mandatory court appearance and possible penalty assessment in compliance with this code.

Tracking #	Violations Resulting From This Inspection		
CVIO-22-1653400541	Date 5/24/2022	Compliance Date 6/6/2023	Status OPEN
{ Location FINAL NOTICE Statute : § 303.7 Roofs and drainage Summary Roofs and flashing shall be maintained sound and tight having no defects to admit rain. Drains, gutters, and downpours shall be in good repair and not discharge in a manner that creates a public nuisance.			
CVIO-22-1653400551	Date 5/24/2022	Compliance Date 6/6/2023	Status OPEN
{ Location FINAL NOTICE			

Statute : § 302.4.1 Grass & Weeds. Summary Grass and weeds must be maintained below 10 inches on the entire property.				
CVIO-22-1653400556	Date 5/24/2022	Compliance Date 6/6/2023	Status	OPEN
Location FINAL NOTICE Statute : § 303.6 Exterior walls Summary Exterior walls shall be free from holes, breaks, loose or rotting materials and maintained weatherproof.				
CVIO-22-1653400546	Date 5/24/2022	Compliance Date 6/6/2023	Status	OPEN
Location FINAL NOTICE Statute : § 301.3 Vacant structures and land. Summary Vacant structure and property must be maintained clean, safe, and sanitary.				
CVIO-22-1653400536	Date 5/24/2022	Compliance Date 6/6/2023	Status	OPEN
Location FINAL NOTICE Statute Unfit Housing : § 108.1.3 Unfit Housing Summary House is in complete disrepair. It has substantial water damage and is uninhabitable.				

If you have questions regarding the status or nature of a violation please contact the department at (609) 296-7241



Mike Fromosky - 609-296-7241 Ext. 617

6/6/2023



Little Egg Harbor Township
Code Enforcement
665 Radio Road
Little Egg Harbor Township, NJ 08087
(609) 296-7241

Inspected: Tenant Owner

CAMPOS, ARTURO
499 MAIN ROAD
VINELAND, NJ 08360

VIOLATION NOTICE

Block 325.26 Lot 30 Qualifier _____ 110 NATIONAL UNION BLVD.
Inspector Mike Fromosky

Inspection Notes

Follow up of previous violations on abandoned properties revealed that this property still has violations pending. This property has been on the Township demo list for a few years now and must be completed.

06/06/22 No improvement noted. Work order issued.

07/11/22 No improvement noted, other than the results of the work order. The demo process has to continue to remediate this problem properly.

09/06/22 No improvement noted. The demo process will continue, but the lien holder is trying to foreclose.

11/04/22 No improvement noted. We will continue to work towards a court ordered demolition.

12/16/22 No improvement noted. Continue with the demo process.

01/30/23 No improvement noted. Continue with the demo process despite the latest claim from Mr. Leonardis.

03/28/23 No improvement noted, in fact the property continues to deteriorate. Mr. Leonardis, requested that the town stop pursuing the demo, but he has not done anything to remediate this property. Continue with the demo process and let Mr. Leonardis make his argument in court.

04/27/23 No improvement noted. Continued deterioration of the property. Continue to pursue the demo process.

06/06/23 No improvement noted. Continue to pursue the demolition process.

You are hereby notified that a code official inspected the above referenced premises and determined that there is a violation of the municipal code. The violation listed below must be completed prior to the violation abatement date indicated. Failure to obey this order of the code official shall result in the issuance of a summons resulting in a mandatory court appearance and possible penalty assessment in compliance with this code.

Tracking #	<u>Violations Resulting From This Inspection</u>	
CVIO-22-1653400541	Date 5/24/2022 Compliance Date 8/3/2023	Status OPEN
{	Location FINAL NOTICE	
	Statute : § 303.7 Roofs and drainage	
	Summary Roofs and flashing shall be maintained sound and tight having no defects to admit rain. Drains, gutters, and downpours shall be in good repair and not discharge in a manner that creates a public nuisance.	

CVIO-22-1653400551 Date 5/24/2022 Compliance Date 8/3/2023 Status OPEN

{ Location FINAL NOTICE
Statute : § 302.4.1 Grass & Weeds.
Summary Grass and weeds must be maintained below 10 inches on the entire property.

CVIO-22-1653400556 Date 5/24/2022 Compliance Date 8/3/2023 Status OPEN

{ Location FINAL NOTICE
Statute : § 303.6 Exterior walls
Summary Exterior walls shall be free from holes, breaks, loose or rotting materials and maintained weatherproof.

CVIO-22-1653400546 Date 5/24/2022 Compliance Date 8/3/2023 Status OPEN

{ Location FINAL NOTICE
Statute : § 301.3 Vacant structures and land.
Summary Vacant structure and property must be maintained clean, safe, and sanitary.

CVIO-22-1653400536 Date 5/24/2022 Compliance Date 8/3/2023 Status OPEN

{ Location FINAL NOTICE
Statute Unfit Housing : § 108.1.3 Unfit Housing
Summary House is in complete disrepair. It has substantial water damage and is uninhabitable.

If you have questions regarding the status or nature of a violation please contact the department at
(609) 296-7241



Mike Fromosky - 609-296-7241 Ext. 617



Little Egg Harbor Township
 Code Enforcement
 665 Radio Road
 Little Egg Harbor Township, NJ 08087
 (609) 296-7241

9/20/2023

Inspected: Tenant Owner

CAMPOS, ARTURO
 110 NATIONAL UNION BLVD
 LITTLE EGG HARBOR, NJ 08087

VIOLATION NOTICE

Block 325.26 Lot 30 Qualifier _____ 110 NATIONAL UNION BLVD.
 Inspector Mike Fromosky

Inspection Notes

Follow up of previous violations on abandoned properties revealed that this property still has violations pending. This property has been on the Township demo list for a few years now and must be completed.

06/06/22 No improvement noted. Work order issued.

07/11/22 No improvement noted, other than the results of the work order. The demo process has to continue to remediate this problem properly.

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06/06/23 No improvement noted. Continue to pursue the demolition process.

08/14/23 Some improvement noted. Grass and weeds have been cleaned up, but not much else has been corrected on the structure.

09/20/23 Some improvement to the back yard, but nothing has changed positively on the house. Posted for Administrative Hearing to proceed with the demolition process.

You are hereby notified that a code official inspected the above referenced premises and determined that there is a violation of the municipal code. The violation listed below must be completed prior to the violation abatement date indicated. Failure to obey this order of the code official shall result in the issuance of a summons resulting in a mandatory court appearance and possible penalty assessment in compliance with this code.

Tracking #	<u>Violations Resulting From This Inspection</u>	
CVIO-22-1653400541	Date 5/24/2022 Compliance Date 10/31/2023	Status OPEN

{ Location FINAL NOTICE
 { Statute : § 303.7 Roofs and drainage
 { Summary Roofs and flashing shall be maintained sound and tight having no defects to admit rain. Drains, gutters, and downpours shall be in good repair and not discharge in a manner that creates a public nuisance.

CVIO-22-1653400551 Date 5/24/2022 Compliance Date 10/31/2023 Status OPEN

{ Location FINAL NOTICE
 { Statute : § 302.4.1 Grass & Weeds.
 { Summary Grass and weeds must be maintained below 10 inches on the entire property.

CVIO-22-1653400556 Date 5/24/2022 Compliance Date 10/31/2023 Status OPEN

{ Location FINAL NOTICE
 { Statute : § 303.6 Exterior walls
 { Summary Exterior walls shall be free from holes, breaks, loose or rotting materials and maintained weatherproof.

CVIO-22-1653400546 Date 5/24/2022 Compliance Date 10/31/2023 Status OPEN

{ Location FINAL NOTICE
 { Statute : § 301.3 Vacant structures and land.
 { Summary Vacant structure and property must be maintained clean, safe, and sanitary.

CVIO-22-1653400536 Date 5/24/2022 Compliance Date 10/31/2023 Status OPEN

{ Location FINAL NOTICE
 { Statute Unfit Housing : § 108.1.3 Unfit Housing
 { Summary House is in complete disrepair. It has substantial water damage and is uninhabitable.

If you have questions regarding the status or nature of a violation please contact the department at (609) 296-7241



Mike Fromosky - 609-296-7241 Ext. 617

10/31/2023



Little Egg Harbor Township
Code Enforcement
665 Radio Road
Little Egg Harbor Township, NJ 08087
(609) 296-7241

Inspected: Tenant Owner

CAMPOS, ARTURO
110 NATIONAL UNION BLVD
LITTLE EGG HARBOR, NJ 08087

VIOLATION NOTICE

Block 325.26 Lot 30 Qualifier 110 NATIONAL UNION BLVD.
Inspector Mike Fromosky

Inspection Notes

Follow up of previous violations on abandoned properties revealed that this property still has violations pending. This property has been on the Township demo list for a few years now and must be completed.

06/06/22 No improvement noted. Work order issued.

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09/20/23 Some improvement to the back yard, but nothing has changed positively on the house. Posted for Administrative Hearing to proceed with the demolition process.

10/31/23 No further progress noted. Admin hearing was held on 10/17/23 without any interested parties in attendance. The demo process will continue.

You are hereby notified that a code official inspected the above referenced premises and determined that there is a violation of the municipal code. The violation listed below must be completed prior to the violation abatement date indicated. Failure to obey this order of the code official shall result in the issuance of a summons resulting in a mandatory court appearance and possible penalty assessment in compliance with this code.

Tracking #	Violations Resulting From This Inspection		
CVIO-22-1653400541	Date 5/24/2022	Compliance Date 12/5/2023	Status OPEN
{ Location FINAL NOTICE Statute : § 303.7 Roofs and drainage Summary Roofs and flashing shall be maintained sound and tight having no defects to admit rain. Drains, gutters, and downpours shall be in good repair and not discharge in a manner that creates a public nuisance.			
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{ Location FINAL NOTICE Statute : § 303.6 Exterior walls Summary Exterior walls shall be free from holes, breaks, loose or rotting materials and maintained weatherproof.			
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{ Location FINAL NOTICE Statute : § 301.3 Vacant structures and land. Summary Vacant structure and property must be maintained clean, safe, and sanitary.			
CVIO-22-1653400536	Date 5/24/2022	Compliance Date 12/5/2023	Status OPEN
{ Location FINAL NOTICE Statute Unfit Housing : § 108.1.3 Unfit Housing Summary House is in complete disrepair. It has substantial water damage and is uninhabitable.			

If you have questions regarding the status or nature of a violation please contact the department at (609) 296-7241



Mike Fromosky - 609-296-7241 Ext. 617

11/17/2023



Little Egg Harbor Township
Code Enforcement
665 Radio Road
Little Egg Harbor Township, NJ 08087
(609) 296-7241

Inspected: Tenant Owner

CAMPOS, ARTURO
110 NATIONAL UNION BLVD
LITTLE EGG HARBOR, NJ 08087

VIOLATION NOTICE

Block 325.26 Lot 30 Qualifier _____ 110 NATIONAL UNION BLVD.
Inspector Mike Fromosky

Inspection Notes

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09/20/23 Some improvement to the back yard, but nothing has changed positively on the house. Posted for Administrative Hearing to proceed with the demolition process.

10/31/23 No further progress noted. Admin hearing was held on 10/17/23 without any interested parties in attendance. The demo process will continue.

11/17/23 No further progress noted. R. Leonardis posted the foreclosure notice. Property was posted as Condemned today with the intention to demo by the Township.

You are hereby notified that a code official inspected the above referenced premises and determined that there is a violation of the municipal code. The violation listed below must be completed prior to the violation abatement date indicated.

Failure to obey this order of the code official shall result in the issuance of a summons resulting in a mandatory court appearance and possible penalty assessment in compliance with this code.

Tracking #	Violations Resulting From This Inspection			Status
CVIO-22-1653400541	Date 5/24/2022	Compliance Date 12/28/2023		OPEN
{ Location FINAL NOTICE { Statute : § 303.7 Roofs and drainage { Summary Roofs and flashing shall be maintained sound and tight having no defects to admit rain. Drains, gutters, and downpours shall be in good repair and not discharge in a manner that creates a public nuisance.				
CVIO-22-1653400551	Date 5/24/2022	Compliance Date 12/28/2023		OPEN
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CVIO-22-1653400556	Date 5/24/2022	Compliance Date 12/28/2023		OPEN
{ Location FINAL NOTICE { Statute : § 303.6 Exterior walls { Summary Exterior walls shall be free from holes, breaks, loose or rotting materials and maintained weatherproof.				
CVIO-22-1653400546	Date 5/24/2022	Compliance Date 12/28/2023		OPEN
{ Location FINAL NOTICE { Statute : § 301.3 Vacant structures and land. { Summary Vacant structure and property must be maintained clean, safe, and sanitary.				
CVIO-22-1653400536	Date 5/24/2022	Compliance Date 12/28/2023		OPEN
{ Location FINAL NOTICE { Statute Unfit Housing : § 108.1.3 Unfit Housing { Summary House is in complete disrepair. It has substantial water damage and is uninhabitable.				

If you have questions regarding the status or nature of a violation please contact the department at (609) 296-7241

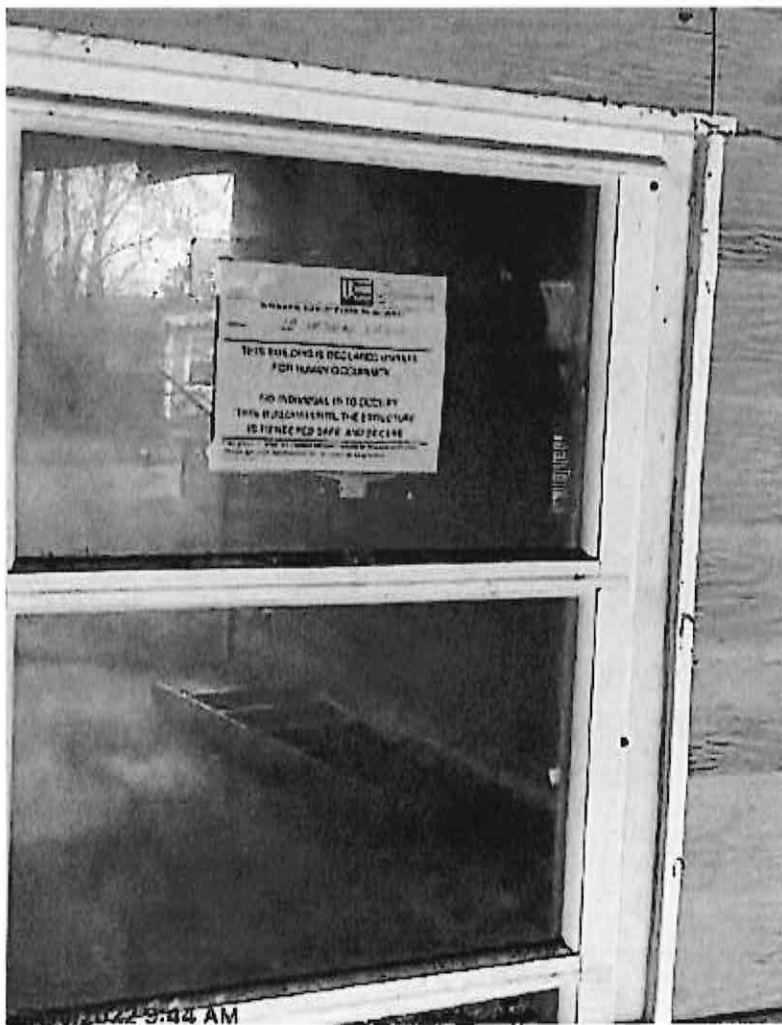


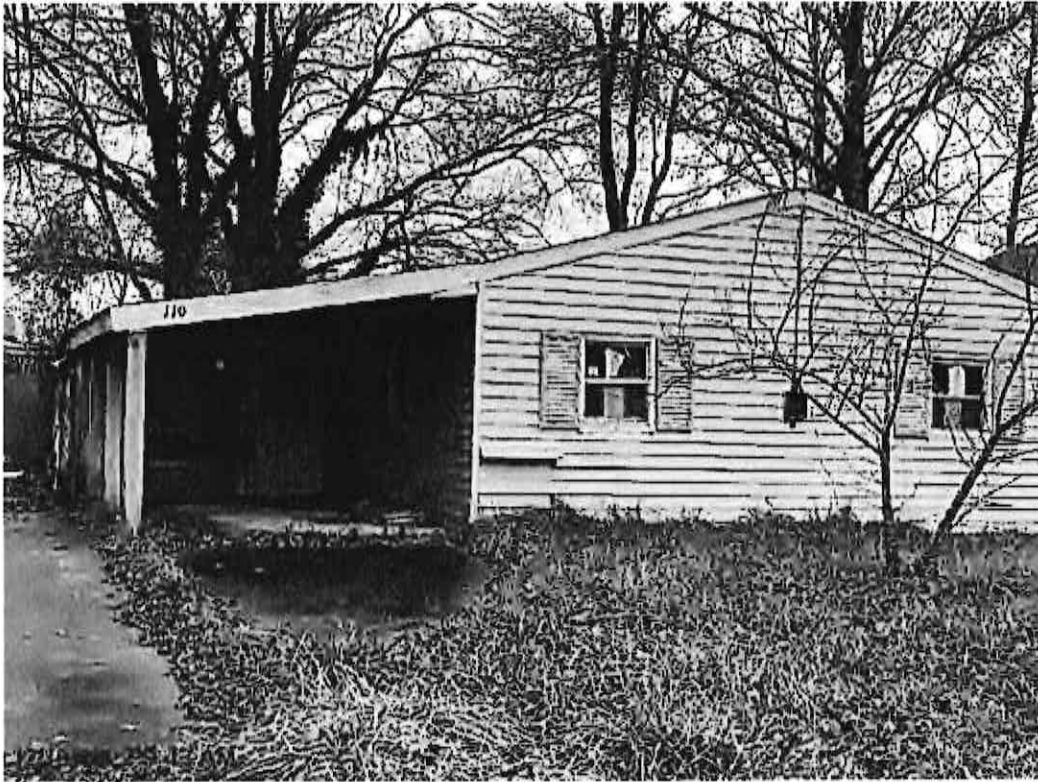
Mike Fromosky - 609-296-7241 Ext. 617

















10/31/2023 1:35 PM

EXHIBIT C

PARTNERS

Laura M. Halm
Jean L. Cipriani

Melanie S. Appleby
Robin La Bue
Michael S. Nagurka
Andrea E. Wyatt



Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.

ATTORNEYS AT LAW

ASSOCIATES

Danielle Rosiejka
Matthew J. Donohue
Brandon A. Klimakowski

OF COUNSEL

Charles H. Mandell
Brian C. Bartlett
Joseph C. Falk

September 13, 2023

Via Regular & Certified Mail – RRR (7022 1670 0001 8589 2804) & Posted on the Premises

Nereyda Campos
110 National Union Blvd
Little Egg Harbor, NJ 08087

**Re: 110 National Union Blvd Little Egg Harbor Township
Notice of Administrative Hearing
October 17, 2023 at 10:30 A.M.**

Dear Mrs. Campos:

This office represents the interests of the Township of Little Egg Harbor in the above referenced matter. As you may be aware, a violation notice has been sent to your attention. The Township is planning to hold an administrative hearing on **October 17, 2023 at 10:30 a.m.** at 665 Radio Road, Little Egg Harbor Township, NJ 08087. This hearing is being held pursuant to N.J.S.A. 40:48-2.5 and N.J.S.A. 40:48-2.7.

Please have all evidence prepared and ready for your hearing. If you have any expert reports that represent the condition of the property, please send that in advance of the hearing date.

Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to be 'DAR', written over a circular scribble.

DANIELLE A. ROSIEJKA, ESQ.
For the Firm
drosiejka@rmshc.law

cc: Mike Fromosky (via email)
Karl Held (via email)

PARTNERS

Laura M. Halm
Jean L. Cipriani

Melanie S. Appleby
Robin La Bue
Michael S. Nagurka
Andrea E. Wyatt



Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.

ATTORNEYS AT LAW

ASSOCIATES

Danielle Rosiejka
Matthew J. Donohue
Brandon A. Klimakowski

OF COUNSEL

Charles H. Mandell
Brian C. Bartlett
Joseph C. Falk

September 13, 2023

Via Regular & Certified Mail – RRR (7022 1670 0001 8589 2798)

Nereyda Campos
913 Jamaica Blvd.
Toms River, NJ 08757-3703

**Re: 110 National Union Blvd Little Egg Harbor Township
Notice of Administrative Hearing
October 17, 2023 at 10:30 A.M.**

Dear Mrs. Campos:

This office represents the interests of the Township of Little Egg Harbor in the above referenced matter. As you may be aware, a violation notice has been sent to your attention. The Township is planning to hold an administrative hearing on **October 17, 2023 at 10:30 a.m.** at 665 Radio Road, Little Egg Harbor Township, NJ 08087. This hearing is being held pursuant to N.J.S.A. 40:48-2.5 and N.J.S.A. 40:48-2.7.

Please have all evidence prepared and ready for your hearing. If you have any expert reports that represent the condition of the property, please send that in advance of the hearing date.

Thank you.

Very truly yours,

DANIELLE A. ROSIEJKA, ESQ.
For the Firm
drosiejka@rmshc.law

cc: Mike Fromosky (via email)
Karl Held (via email)

PARTNERS

Laura M. Halm
Jean L. Cipriani

Melanie S. Appleby
Robin La Bue
Michael S. Nagurka
Andrea E. Wyatt



Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.

ATTORNEYS AT LAW

ASSOCIATES

Danielle Rosiejka
Matthew J. Donohue
Brandon A. Klimakowski

OF COUNSEL

Charles H. Mandell
Brian C. Bartlett
Joseph C. Falk

September 13, 2023

Via Regular & Certified Mail – RRR (7022 1670 0001 8589 2811)

Richard Leonardis
110 Main Avenue
Clifton, NJ 07014

**Re: 110 National Union Blvd Little Egg Harbor Township
Tax Sale Certificate 17-00224
Notice of Administrative Hearing
October 17, 2023 at 10:30 A.M.**

Dear Mr. Leonardis:

This office represents the interests of the Township of Little Egg Harbor in the above referenced matter. As you may be aware, a violation notice has been sent to your attention. The Township is planning to hold an administrative hearing on **October 17, 2023 at 10:30 a.m.** at 665 Radio Road, Little Egg Harbor Township, NJ 08087. This hearing is being held pursuant to N.J.S.A. 40:48-2.5 and N.J.S.A. 40:48-2.7.

Please have all evidence prepared and ready for your hearing. If you have any expert reports that represent the condition of the property, please send that in advance of the hearing date.

Thank you.

Very truly yours,


DANIELLE A. ROSIEJKA, ESQ.
For the Firm
drosiejka@rmshc.law

cc: Mike Fromosky (via email)
Karl Held (via email)

AFFIDAVIT OF PUBLICATION


Publisher's Fee \$29.92 Affidavit \$35.00

STATE OF WISCONSIN
Brown County

Personally appeared  at County of Brown, State of Wisconsin.

Of the **Asbury Park Press**, newspaper printed in Freehold, New Jersey and published in Neptune, in State of New Jersey and Monmouth/Ocean Counties, and of general circulation in Monmouth/Ocean Counties, who being duly sworn, depose and saith that the advertisement of which the annexed is a true copy, has been published in the said newspaper 1 times, once in each issue dated as follows:

09/30/2023 A.D 2023


Notary Public State of Wisconsin County of Brown
4-6-27

My commission expires

DENISE ROBERTS
Notary Public
State of Wisconsin

Ad Number: 0005835529

Run Dates: 09/30/2023

NOTICE OF ADMINISTRATIVE HEARING

NOTICE is hereby given to Arturo Campos, Nereyda Campos and any and all other persons unknown claiming any right, title, estate, lien, or interest in the real property located at 110 National Union Blvd, Little Egg Harbor, New Jersey, designated as Block 325.26, Lot 30, on the Tax Map of the Township of Little Egg Harbor, that an Administrative Hearing is being held on October 17, 2023 at 10:30 a.m. at 665 Radio Road, Little Egg Harbor Township, NJ 08087. This hearing is being held pursuant to Little Egg Harbor Township Code, Chapter 27J, as well as N.J.S.A. 40:48-2.5 and N.J.S.A. 40:48-2.7 in relation to the violation notices that have been sent to your attention.

Please bring all evidence to the hearing. If you have any expert reports that represent the condition of the property, they can be sent to the attorney listed below in advance of the hearing date.

Attorney for the Township of Little Egg Harbor for this hearing is Danielle A. Rosiejka, Esq. with the law office of Rothstein, Mandell, Strohm, Halm & Cipriani, P.A., located at 98 East Water Street Toms River, NJ 08753. The office telephone number is 732-363-0777.

NOTICE is further given that the object of the administrative hearing is to determine whether the Township of Little Egg Harbor will proceed to demolish the structure located at 110 National Union Blvd, Little Egg Harbor, New Jersey, designated as Block 325.26, Lot 30, on the Tax Map of the Township of Little Egg Harbor.

**ROTHSTEIN, MANDELL, STROHM,
HALM & CIPRIANI, P.A.**

_____/s/ Danielle A. Rosiejka_____

By: Danielle A. Rosiejka, Esq.
Attorney for Township of Little Egg Harbor

(\$29.92)

0005835529.01

EXHIBIT D

PARTNERS

Laura M. Halm
Jean L. Cipriani

Melanie S. Appleby
Robin La Bue
Michael S. Nagurka
Andrea E. Wyatt



Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.

ATTORNEYS AT LAW

ASSOCIATES

Danielle Rosiejka
Matthew J. Donohue
Brandon A. Klimakowski

OF COUNSEL

Charles H. Mandell
Brian C. Bartlett
Joseph C. Falk

November 6, 2023

**Via Regular & Certified Mail – RRR (7022 1670 0001 8589 2859)
and Posted on the Premises**

Arturo Campos
110 National Union Blvd
Little Egg Harbor, NJ 08087

**Re: 110 National Union Blvd Little Egg Harbor Township
Administrative Hearing Opinion from October 17, 2023**

Dear Mr. Campos:

This office represents the interests of the Township of Little Egg Harbor in the above-referenced matter. As you may be aware, a violation notice was sent to your attention earlier this year and subsequently, an administrative hearing was held on October 17, 2023. Pursuant to N.J.S.A. 40:48-2.5 and N.J.S.A. 40:48-2.7, all municipalities are required to comply with strict standards. As of the date of this letter, the Township has fully complied with both N.J.S.A. 40:48-2.5 and N.J.S.A. 40:48-2.7.

Please be advised that the Township will be filing in the Superior Court, Chancery Division seeking an order to remediate or demolish this property in the coming weeks.

Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'DAR', is written over a large, stylized 'D' that serves as a background for the signature.

DANIELLE A. ROSIEJKA, ESQ.

For the Firm

drosiejka@rmshc.law

cc: Mike Fromosky (via email)
Karl Held (via email)

PLEASE TAKE NOTICE that on Tuesday, the **17th of October 2023**, at ten thirty in the morning, Mike Fromosky, Code Enforcement Officer for Little Egg Harbor Township and Danielle A. Rosiejka Esq., counsel for the Township of Little Egg Harbor, conducted an administrative hearing regarding 110 National Union Blvd, Little Egg Harbor, New Jersey, pursuant to N.J.S.A. 40:48-2.5(b). This property is also defined as Lot 30 in Block 325.26. The property owner, Arturo Campos, did not attend the hearing.

TAKE FURTHER NOTICE that at this hearing, the property and structure at 110 National was found to be structurally unsound. In addition to being structurally unsound, the building is dilapidated and in disrepair. The structure suffers from severe storm and water damage. There are multiple issues with the foundation, roofing, and the exterior walls. Parts of the roof of have completely collapsed leaving the interior of the property open to the elements. The interior of the property continued to deteriorate and is collapsing upon itself due to exposure to the elements. Windows on the property are broken and allow access to the inside of the property. The property is unsecure and is ripe for vagrants, suffers from unsanitary conditions, and is an attractive nuisance for children. This property lays vacant, suffers from significant mold, and continuous flooding issues.

TAKE FURTHER NOTICE that the Township of Little Egg Harbor will be filing an Order to Show Cause before The Honorable March A. Troncone J.S.C. for the demolition of the structure located at 110 National Little Egg Harbor, New Jersey.

r|m|s|h|c

Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.
ATTORNEYS AT LAW

98 East Water Street
Toms River, NJ 08753

o: 732.363.0777
f: 732.905.6555

By: 
MIKE FROMOSKY
LEHT Code Enforcement

Date: 10/23/23

CERTIFICATION

I hereby certify that this administrative hearing took place on October 17, 2023 and that I
oversaw the hearing.

Danielle A. Rosiejka

DANIELLE A. ROSIEJKA, ESQ.

Dated: 11/6/23

r|m|s|h|c

Rothstein, Mandell, Strohm,
Helm & Cipriani, P.A.
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Toms River, NJ 08753

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PARTNERS

Laura M. Halm
Jean L. Cipriani

Melanie S. Appleby
Robin La Bue
Michael S. Nagurka
Andrea E. Wyatt



Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.

ATTORNEYS AT LAW

ASSOCIATES

Danielle Rosiejka
Matthew J. Donohue
Brandon A. Klimakowski

OF COUNSEL

Charles H. Mandell
Brian C. Bartlett
Joseph C. Falk

November 6, 2023

Via Regular & Certified Mail – RRR (7022 1670 0001 8589 2866)

Richard Leonardis
110 Main Avenue
Clifton, NJ 07014

**Re: 110 National Union Blvd Little Egg Harbor Township
Administrative Hearing Opinion from October 17, 2023
Tax Sale Certificate 17-00224**

Dear Mr. Leonardis:

This office represents the interests of the Township of Little Egg Harbor in the above-referenced matter. As you may be aware, a violation notice was sent to your attention earlier this year and subsequently, an administrative hearing was held on October 17, 2023. Pursuant to N.J.S.A. 40:48-2.5 and N.J.S.A. 40:48-2.7, all municipalities are required to comply with strict standards. As of the date of this letter, the Township has fully complied with both N.J.S.A. 40:48-2.5 and N.J.S.A. 40:48-2.7.

Please be advised that the Township will be filing in the Superior Court, Chancery Division seeking an order to remediate or demolish this property in the coming weeks.

Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'DAR', with a stylized flourish extending from the bottom right.

DANIELLE A. ROSIEJKA, ESQ.
For the Firm
drosiejka@rmshc.law

cc: Mike Fromosky (via email)
Karl Held (via email)

PLEASE TAKE NOTICE that on Tuesday, the **17th of October 2023**, at ten thirty in the morning, Mike Fromosky, Code Enforcement Officer for Little Egg Harbor Township and Danielle A. Rosiejka Esq., counsel for the Township of Little Egg Harbor, conducted an administrative hearing regarding 110 National Union Blvd, Little Egg Harbor, New Jersey, pursuant to N.J.S.A. 40:48-2.5(b). This property is also defined as Lot 30 in Block 325.26. The property owner, Arturo Campos, did not attend the hearing.

TAKE FURTHER NOTICE that at this hearing, the property and structure at 110 National was found to be structurally unsound. In addition to being structurally unsound, the building is dilapidated and in disrepair. The structure suffers from severe storm and water damage. There are multiple issues with the foundation, roofing, and the exterior walls. Parts of the roof of have completely collapsed leaving the interior of the property open to the elements. The interior of the property continued to deteriorate and is collapsing upon itself due to exposure to the elements. Windows on the property are broken and allow access to the inside of the property. The property is unsecure and is ripe for vagrants, suffers from unsanitary conditions, and is an attractive nuisance for children. This property lays vacant, suffers from significant mold, and continuous flooding issues.

TAKE FURTHER NOTICE that the Township of Little Egg Harbor will be filing an Order to Show Cause before The Honorable March A. Troncone J.S.C. for the demolition of the structure located at 110 National Little Egg Harbor, New Jersey.

r|m|s|h|c

Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.
ATTORNEYS AT LAW

98 East Water Street
Toms River, NJ 08753

o: 732.363.0777
f: 732.905.6555

By: 
MIKE FROMOSKY
LEHT Code Enforcement

Date: 10/23/23

CERTIFICATION

I hereby certify that this administrative hearing took place on October 17, 2023 and that I
oversaw the hearing.

Dated: 11/6/23

Danielle A. Rosiejka

DANIELLE A. ROSIEJKA, ESQ.

r|m|s|h|c

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AFFIDAVIT OF PUBLICATION

Order Number : 9503952

STATE OF WISCONSIN
Brown County

Of the **Asbury Park Press**, a newspaper printed in Freehold, New Jersey and published in Neptune, in State of New Jersey and Monmouth/Ocean Counties, and of general circulation in Monmouth/Ocean Counties, who being duly sworn, depose and saith that the advertisement of which the annexed is a true copy, has been published in said newspaper in the issue:

11/11/2023



Legal Clerk



Notary Public State of Wisconsin County of Brown

4-6-27

My commission expires

DENISE ROBERTS
Notary Public
State of Wisconsin

**NOTICE OF ADMINISTRATIVE
OPINION**

NOTICE is hereby given to Arturo Campos and any and all other persons unknown claiming any right, title, estate, lien, or interest in the real property located at 110 National Union Blvd, Little Egg Harbor, New Jersey, designated as Block 325.26, Lot 30, on the Tax Map of the Township of Little Egg Harbor, that an Administrative Hearing was held on October 17, 2023 pursuant to Little Egg Harbor Township Code, Chapter 273, as well as N.J.S.A. 40:48-2.5 and N.J.S.A. 40:48-2.7.

NOTICE is further given that at this hearing, the property and structure at 110 National Union was found to be structurally unsound, dilapidated and in disrepair. The structure suffers from severe storm and water damage. There are multiple issues with the foundation, roofing, and the exterior walls. Parts of the roof of have completely collapsed leaving the interior of the property open to the elements. The interior of the property has continued to deteriorate and is collapsing upon itself due to exposure to the elements. Windows on the property are broken and allow access to the inside of the property. The property is unsecure and is ripe for vagrants, suffers from unsanitary conditions, and is an attractive nuisance for children. This property lays vacant, suffers from significant mold, and continuous flooding issues.

NOTICE is further given that the Township of Little Egg Harbor will be filing an Order to Show Cause in the Superior Court, Chancery Division seeking an order to demolish the structure located at 110 National Union Blvd, Little Egg Harbor, New Jersey, designated as Block 325.26, Lot 30, on the Tax Map of the Township of Little Egg Harbor.

Attorney for the Township of Little Egg Harbor for this matter is Danielle A. Rosiejka, Esq. with the law office of Rothstein, Mandell, Strohm, Halm & Cipriani, P.A., located at 98 East Water Street, Toms River, NJ 08753. The office telephone number is 732-363-0777.

**ROTHSTEIN, MANDELL, STROHM,
HALM & CIPRIANI, P.A.**

/s/ Danielle A. Rosiejka

By: Danielle A. Rosiejka, Esq.

Attorney for

Township of Little Egg Harbor

(\$30.80)

EXHIBIT E

RECEIVED
NOV 30 2018

GILMORE & MONAHAN, P.A.
Ten Allen Street, 4th Floor
P.O. Box 1540
Toms River, NJ 08754
(732) 240-6000

GILMORE & MONAHAN

**CERTIFICATION OF LITTLE EGG HARBOR
TOWNSHIP CODE ENFORCEMENT OFFICER MIKE
FROMOSKY**

I, MIKE FROMOSKY, of full age hereby certifies as follows:

1. I am the Code Enforcement Official for Little Egg Harbor Township, and I am familiar with the matters contained in this certification.
2. I became aware of the illegal conditions at 110 National Union Boulevard in Little Egg Harbor Township, New Jersey (Block 325.26, Lot 30) and inspected the property on several occasions.
3. The property was found to be structurally unsound, suffering from severe storm and water damage with several large holes in the roof, full of rotted wood, and in need of immediate demolition to protect the community and public at-large. Further, there is chipping paint and the exterior property and contains mold.
4. I inspected the property on February 1, 2018, March 1, 2018, April 13, 2018, June 7, 2018, and finally, on October 16, 2018. At no point did the property owners make an effort to remediate the damages on the property. See Exhibit A (Photographs from the various inspections).
5. The Township of Little Egg Harbor put all current rights holders on notice of an administrative hearing that was to take place on August 31, 2018.
6. On August 31, 2018, Oliver Clifford, Construction Official for the Township, Michael S. Nagurka, Esq., Municipal Attorney for Little Egg Harbor Township, and myself

GILMORE & MONAHAN
A Professional Corporation
COUNSELLORS AT LAW
Allen Street Professional Center
Ten Allen Street
P.O. Box 1540
Toms River, New Jersey 08754

SCANNED

conducted an administrative hearing pursuant to N.J.S.A. 40:48-2.5(b). Although noticed, no current rights holder attended. See Legal Opinion, attached hereto as Exhibit B.

7. The dangerous condition persists on the property. The structure is an imminent hazard to the safety and welfare of the surrounding neighborhood. The Township needs to demolish this structure as unsafe in order to protect the health, safety and welfare of the residents of the Township.

CERTIFICATION

I hereby 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.

Dated:

11/27/18

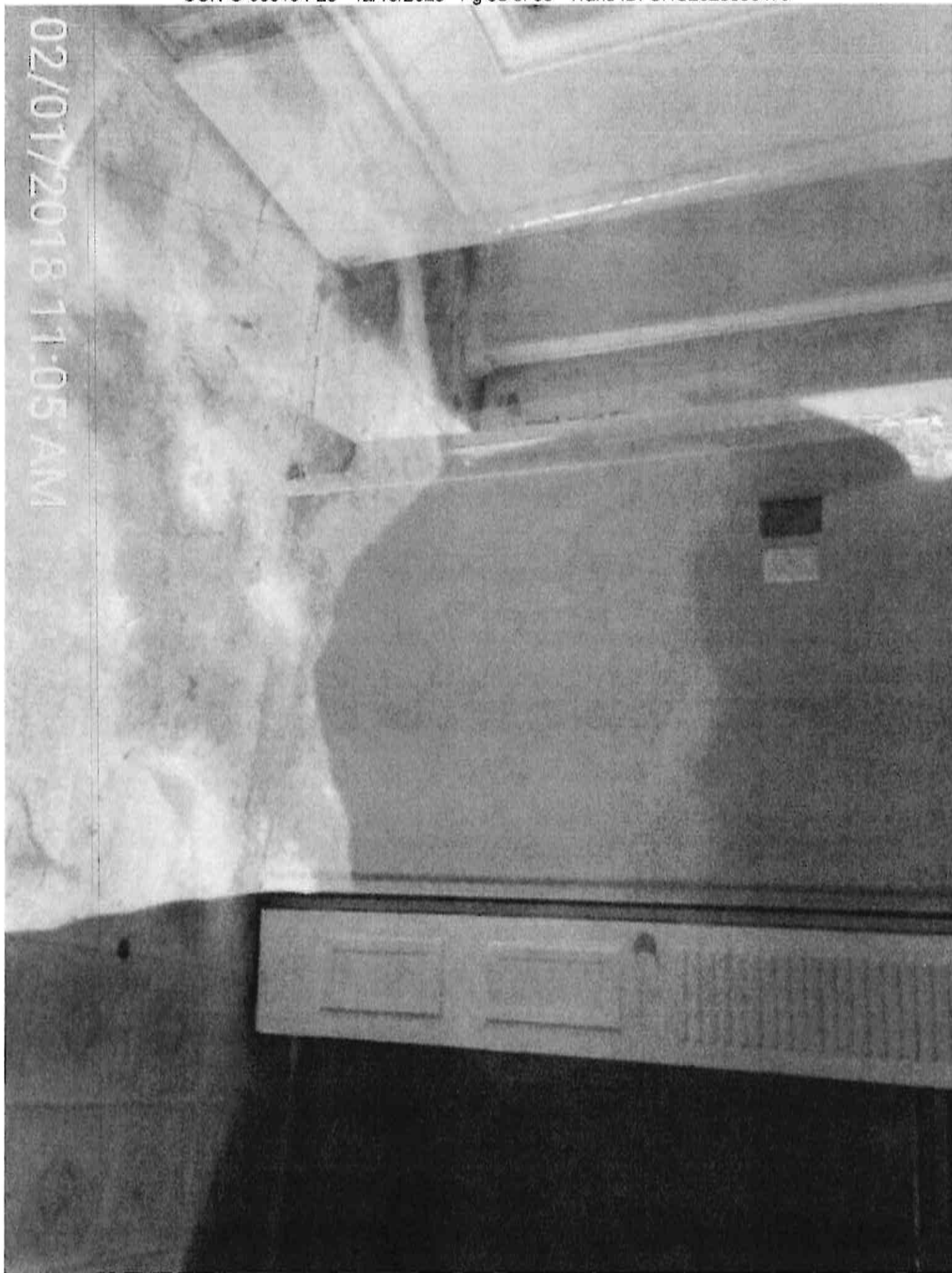

MIKE FROMOSKY
CODE ENFORCEMENT OFFICIAL

EXHIBIT "A"



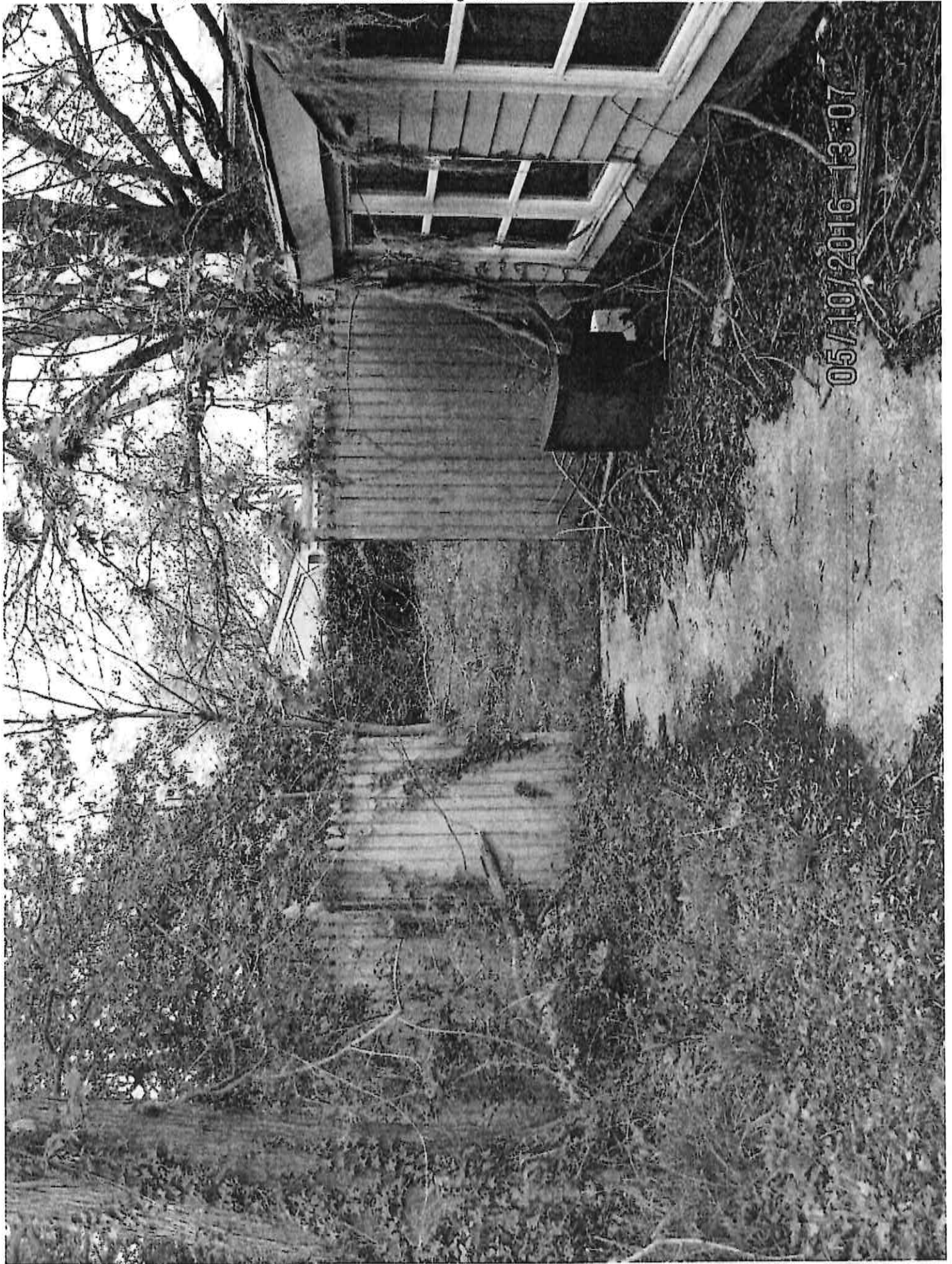
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02/01/2018 11:05 AM





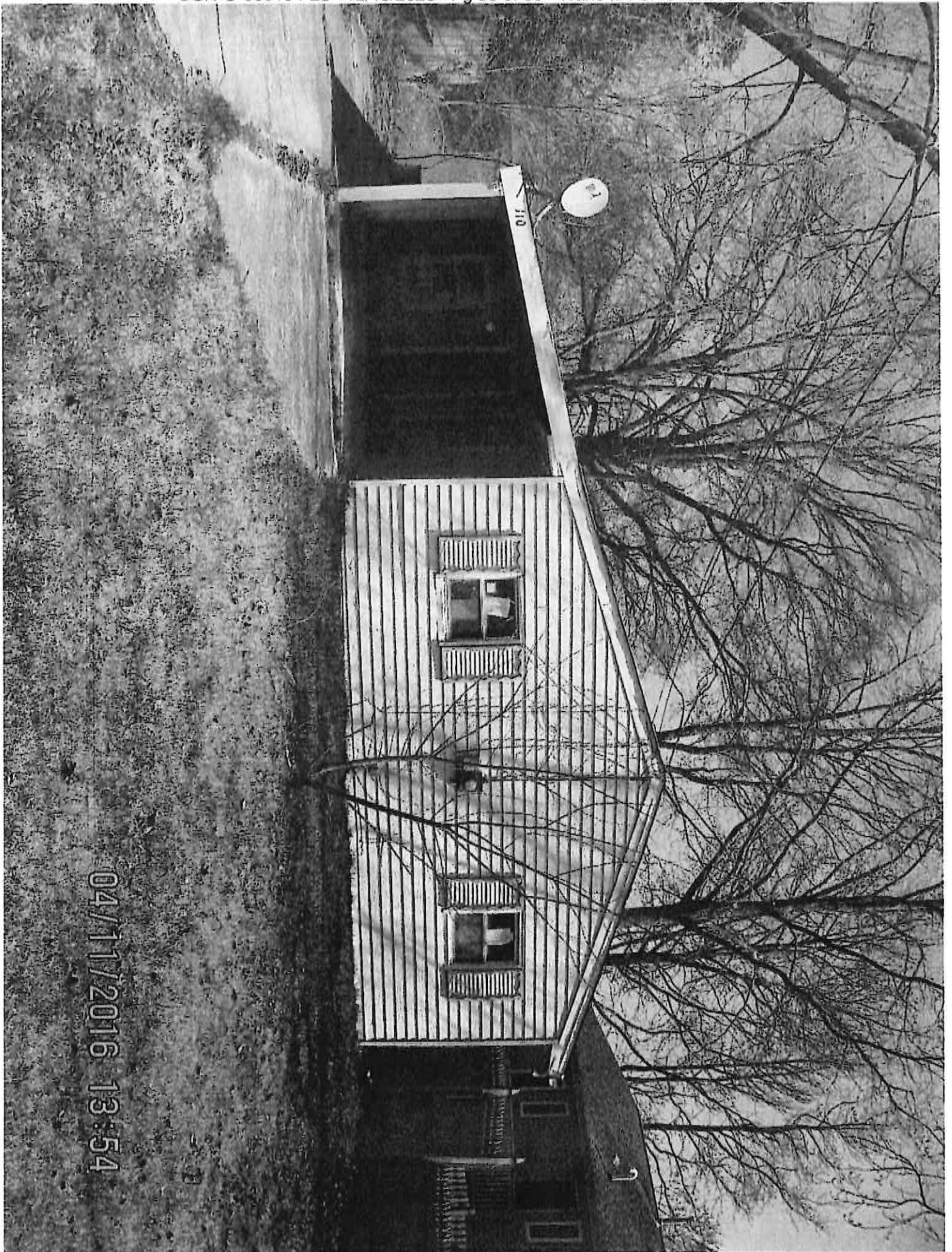




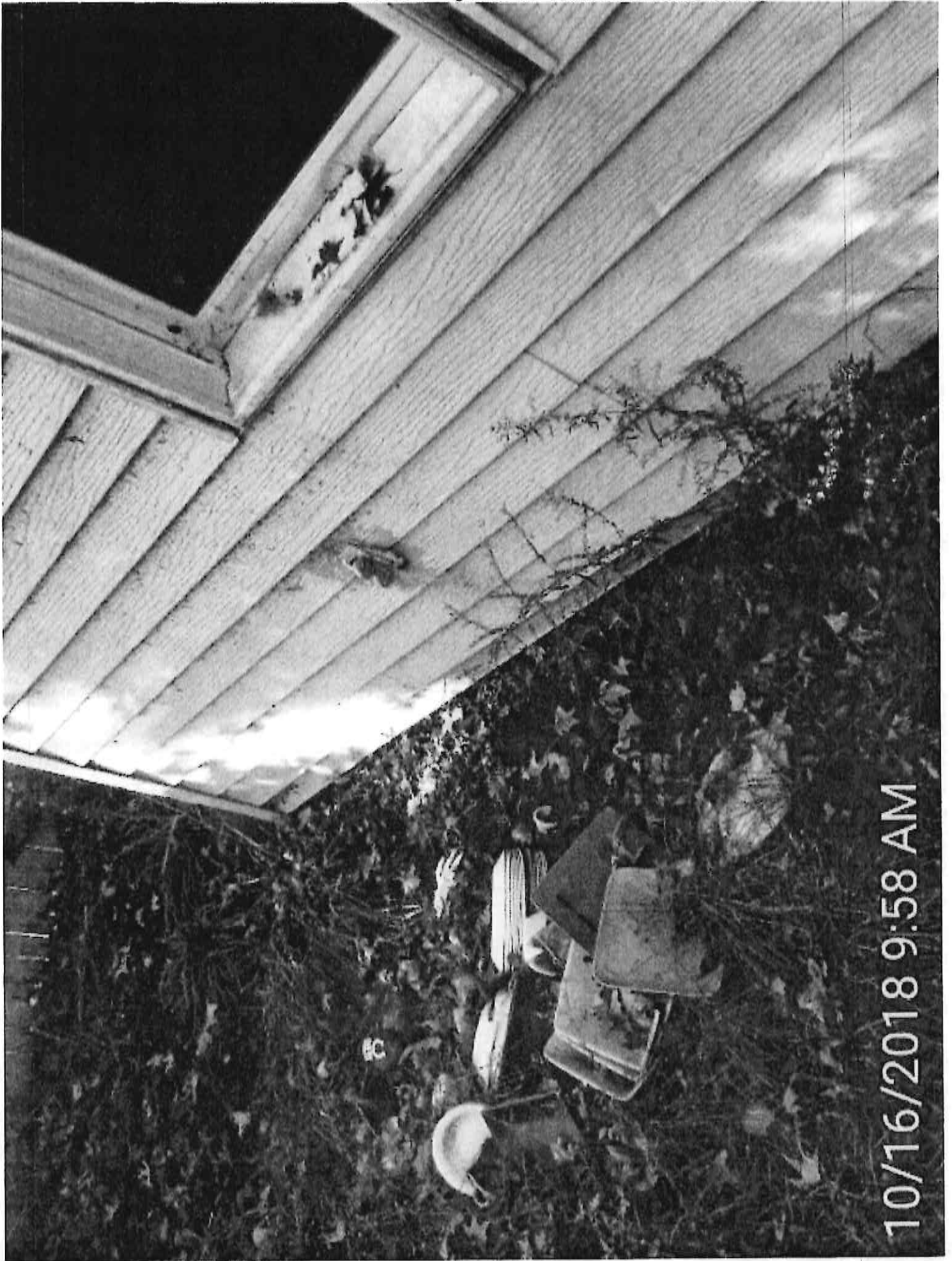
05/10/2016 13:07



04/11/2016 13:54



04/11/2016 13:54



10/16/2018 9:58 AM

In Case Of Emergency, Vandalism
Or Other Damages

Please Contact

**Mortgage Contracting
Services**

813-387-1100

Please contact us if you need to report a
problem. If you leave a message please
describe the problem and include the full
property address.

We do not have 24-hour service.

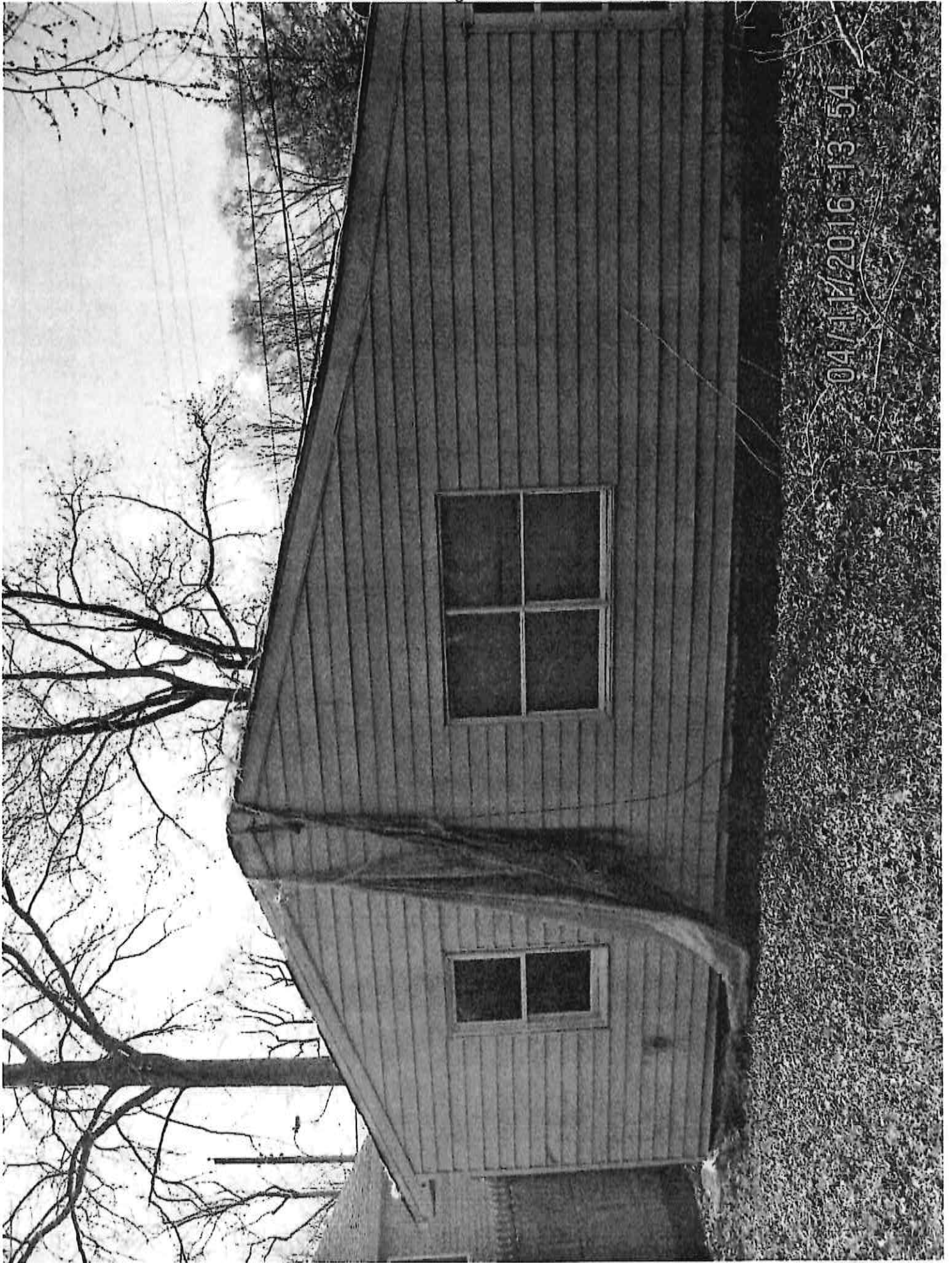
Work Order #

04/11/2016 13:55





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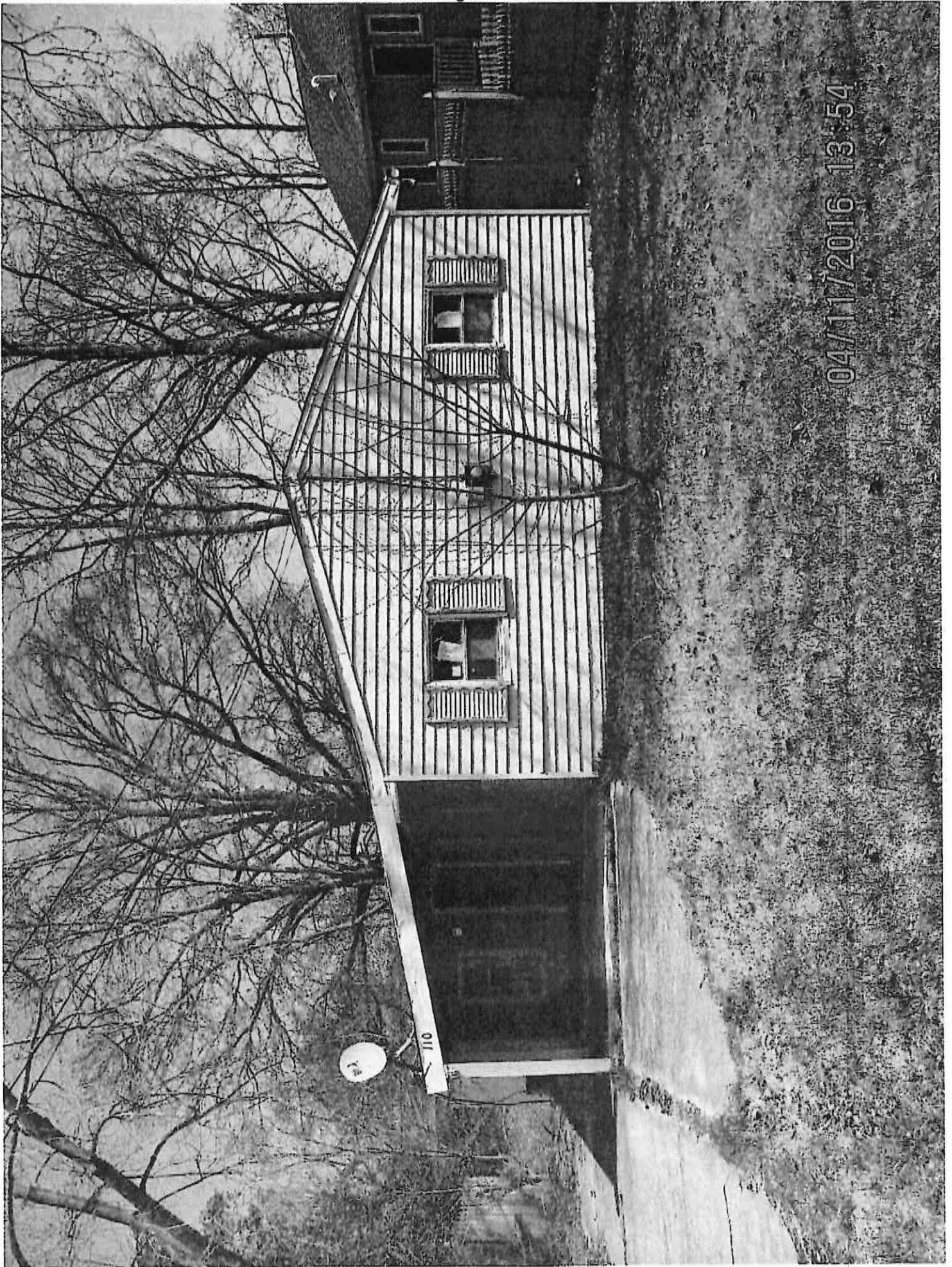
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05/24/2016 13:04

05/24/2016 13:05





04/11/2016 13:54



Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.

ATTORNEYS AT LAW

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Jean L. Cipriani

ASSOCIATES
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Matthew J. Donohue
Brandon A. Klimakowski

OF COUNSEL
Charles H. Mandell
Brian C. Bartlett
Melanie S. Appleby

December 14, 2023

Via Judiciary Electronic Document Submission (JEDS)

The Honorable Mark A. Tronccone P.J.Ch.
Ocean County Courthouse
206 Courthouse Lane, 1st Floor
Toms River, New Jersey 08753

Re: Township of Little Egg Harbor v. Arturo Campos
Docket No. OCN-C-

Dear Judge Tronccone:

This office represents the Township of Little Egg Harbor as Municipal Attorney in the above-referenced matter. Please accept this letter brief in lieu of a more formal brief in support of the emergent relief requested in the Verified Complaint and Order to Show Cause filed with this Court.

STATEMENT OF FACTS

Defendant, Arturo Campos, (“Defendant”), is the current record owner of the property located at 110 National, Little Egg Harbor, New Jersey, designated as Block 325.26, Lot 30, on the Tax Map of the Township of Little Egg Harbor (the “Property”). Defendant does not reside in the Property and the Property has been vacant and unoccupied for years. Defendant’s last known address is believed to be 499 Main Road Vineland, NJ 08360. Notice of the administrative hearing



Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.
ATTORNEYS AT LAW

Page 2
December 14, 2023

and administrative opinion were mailed by certified and regular mail to the property address, last known address, posted on the Property's door, and published in the Asbury Park Press.

As evidenced by the Certification of the Code Enforcement Official for the Township of Little Egg Harbor, Michael Fromosky and the supporting exhibits, the Property is vacant and is creating an imminent hazard to the safety and welfare of the surrounding neighborhood. Further, there is significant damage to the property that has failed to be remediated for years. See generally Certification of Michael Fromosky.

Residents have raised complaints with the Township of Little Egg Harbor about the condition of the Property on a consistent basis. This condition represents a nuisance and a threat to the health, safety, and welfare of the community. In addition to being structurally unsound, the building is dilapidated and in disrepair. The structure suffers from severe storm and water damage. There are multiple issues with the foundation, roofing, and the exterior walls. Parts of the roof of have completely collapsed leaving the interior of the property open to the elements. The interior of the property continues to deteriorate and is collapsing upon itself due to exposure to the elements. The property is unsecure. Windows on the property are broken and allow access to the inside of the property. The walls inside the property are covered in black mold. The Property is ripe for vagrants, suffers from unsanitary conditions, and is an attractive nuisance for children. This Property lays vacant, suffers from significant mold, and continuous flooding issues. See Certification of Michael Fromosky generally, See also Exhibit A-C.

The Township seeks emergent relief that will allow municipal employees and/or designated contractors to enter upon the property and demolish the structure, so as to protect the community and members of the public.

STATEMENT OF LAW



Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.
ATTORNEYS AT LAW

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December 14, 2023

Strict compliance with procedures that are relevant to notice and hearings is required in municipal demolition proceedings where an intrusion on a substantial property right may result. Gamba v. Township of Brick, 395 N.J. Super. 143 (2007) citing Hepner v. Twp. Comm. Of Twp. of Lawrence, 115 N.J. Super. 155, 161-162 (App. Div.) cert den., 59 N.J. 270 (1971). Defendant has failed to respond, demolish the home, or abate the nuisance. Pursuant to N.J.S.A. 40:48-2.3, whenever a municipality finds that there exists any building which is unfit for habitation or occupancy due to conditions rendering such building dangerous to the welfare of the residents of the municipality, the municipality has the power to demolish, or to cause the demolition of the building. The law on these matters allowing the relief sought by the Plaintiff is well settled in New Jersey:

In determining whether to enter an interlocutory injunction, a judge must find that the movant has demonstrated a reasonable probability of success on the merits; that a balancing of the equities and hardships favors injunctive relief; that the movant has no adequate remedy at law and that the irreparable injury to be suffered in the absence of injunctive relief is substantial and imminent; and that the public interest will not be harmed.

Waste Mgmt. of New Jersey, Inc. v. Union County Utilities Auth., 399 N.J. Super. 508, 519-20, 945 A.2d 73, 80 (App. Div. 2008) citing; Crowe v. De Gioia, 90 N.J. 126, 132-34, 447 A.2d 173 (1982);

In the instant matter, it is the responsibility of the municipality to take such reasonable steps as necessary to secure the public health and well-being:

Among the objects sought to be secured by municipal government, there is none more important than the preservation of the public health, and, therefore, the imperative obligation rests on the government of every city, promptly to abate or remove all nuisances by which the public health may be affected.

Ajamian v. N. Bergen Twp., 103 N.J. Super. 61, 73, 246 A.2d 521, 527 (Ch. Div. 1968) aff'd, 107 N.J. Super. 175, 257 A.2d 726 (App. Div. 1969)

By exercising this authority, the Township can demonstrate a likelihood of success on the merits by enforcing Township ordinances and abating the nuisance. Further, the danger that exists as to the continued unabated condition is self-evident. The risk to members of the community,



Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.
ATTORNEYS AT LAW

Page 4
December 14, 2023

especially minors, is extremely high that the condition could lead to an accident. The concerns of injury will only rise as the weather gets warmer and the population of the Township of Little Egg Harbor grows for the summer. There is no hardship to the Defendant in that the Township is doing that which the owner has a duty to have done themselves, which duty has been ignored to the peril of the community. Not only will the public interest not be harmed but also the public interest is best served in allowing the Township to take these precautionary measures necessary to secure the property.

It is respectfully submitted that the Defendant is responsible for the cost of filing legal papers and the cost of demolition. Pursuant to N.J.S.A. 40:48-2.5, Defendant is liable to a municipality for the costs relating to the demolition of an unsafe structure including the cost of filing legal papers and the cost of demolition. Additionally, pursuant to N.J.S.A. 40:48-2.5, the municipality may seek a judgment in summary proceedings for the demolition of a structure if it poses an actual and immediate danger to life by the threatened collapse of any structurally unsafe building.

For these reasons, it is respectfully submitted that the Plaintiff is entitled to the requested relief.

Respectfully Submitted,

Danielle A. Rosiejka

Danielle A. Rosiejka
For the Firm
Drosiejka@rmshe.law

ROTHSTEIN, MANDELL, STROHM, HALM & CIPRIANI, P.A.
Danielle A. Rosiejka, Esq. Attorney ID No.: 022982012
98 East Water Street
Toms River, New Jersey 08753
Attorney for Plaintiff, Township of Little Egg Harbor

<p>TOWNSHIP OF LITTLE EGG HARBOR, Plaintiff, v. ARTURO CAMPOS A/K/A ARTURO CAMPOS DIAZ; RICHARD LEONARDIS; JOHN AND JANE DOES 1-10; ABC LLC's 1-10; and ZYZ CORPS 1-10. Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION, OCEAN COUNTY DOCKET NO. OCN-C- CIVIL ACTION</p>
ORDER	

THIS MATTER being brought before the Court by Danielle A. Rosiejka, Esq. on behalf of the law firm of Rothstein, Mandell, Strohm, Halm & Cipriani, P.A., attorney for Plaintiff, Township of Little Egg Harbor, seeking relief by way of summary action pursuant to N.J. Ct. R. 4:67- 1(a). Based upon the facts set forth in the verified complaint filed herewith and the Court having determined that this matter may be commenced by order to show cause as a summary proceeding pursuant to N.J. Ct. R. 4:52 and the court having established a return date of _____ and having reviewed such evidence and heard such testimony as deemed necessary and appropriate.

IT IS ON THIS _____ day of _____, 2024;

ORDERED that the court finds the Defendant's property is a continuing public nuisance and is a danger to the health safety and welfare of the members of the Township of Little Egg Harbor and must be immediately abated; and it is further



Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.
ATTORNEYS AT LAW

98 East Water Street
Toms River, NJ 08753

o: 732.363.0777
f: 732.905.6555

ORDERED that the Plaintiff is hereby granted access on and over the Defendant's property, located at 110 National Union Blvd in Little Egg Harbor Township, New Jersey, for the purpose of demolishing the structure to cure and abate the public nuisance; and it is further

ORDERED that the Plaintiff shall cure and abate the condition at the Defendant's property between the hours of 9:00 am and 4:00 p.m. on any weekday, Monday through Friday after first having served this order on the Defendant; and it is further

ORDERED that Pursuant to N.J.S.A. 40:48-2.12(f) the Township is acting as set forth in the Verified Complaint to expend public funds to abate the nuisance on the Defendant's property. Upon the completion of such action / abatement by the Plaintiff any and all funds expended by the Plaintiff to abate the nuisance shall become a Municipal Lien against the Defendant's real property; and it is further

ORDERED that copies of this Order be served upon all parties within seven (7) days of the date herein.

HON. MARK A. TRONCONE, P.J.Ch.

r|m|s|h|c

Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.
ATTORNEYS AT LAW

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Toms River, NJ 08753

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ROTHSTEIN, MANDELL, STROHM, HALM & CIPRIANI, P.A.

Danielle A. Rosicjka, Esq. Attorney ID No.: 022982012

98 East Water Street

Toms River, New Jersey 08753

Attorney for Plaintiff, Township of Little Egg Harbor

TOWNSHIP OF LITTLE EGG HARBOR,	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION, OCEAN COUNTY
Plaintiff,	
v.	DOCKET NO. OCN-C- CIVIL ACTION
ARTURO CAMPOS A/K/A ARTURO CAMPOS DIAZ; RICHARD LEONARDIS; JOHN AND JANE DOES 1-10; ABC LLC's 1-10; and ZYZ CORPS 1-10.	ORDER TO SHOW CAUSE
Defendant.	

THIS MATTER having been opened to the court by Plaintiff, Township of Little Egg Harbor, by way of the filing of a Verified Complaint, and the Court having reviewed the Verified Complaint, Certification and other supporting documents, and the Defendant having been given notice of same, and for good cause shown;

IT IS ON THIS _____ day of _____, 2023,
ORDERED that the Defendant show cause before the court on the _____ day of _____, 2023, why the Township of Little Egg Harbor should not demolish the structure located at 110 National Union Blvd, Little Egg Harbor, New Jersey, designated as Block 325.26, Lot 30, on the Tax Map of the Township of Little Egg Harbor;

AND IT IS FURTHER ORDERED that:

1. A copy of this Order to Show Cause, Verified Complaint, Legal Memorandum and any supporting Affidavits or Certifications submitted in support of this application be served upon

rmshc
Rothstein, Mandell, Strohm,
Halm & Cipriani, P.A.
ATTORNEYS AT LAW
98 East Water Street
Toms River, NJ 08753
o: 732.363.0777
f: 732.905.6555

the Defendant personally within four (4) days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

2. The Plaintiff must file with the Court its Proof of Service of the pleadings on the Defendant no later than three (3) days before the return date.

3. Defendant shall file and serve a written response to this Order to Show Cause and proof of service by the _____ day of _____, 2023.

4. The original documents must be filed with the Clerk of the Superior Court in the County listed above. You must send a copy of your opposition papers directly to Judge Mark A. Troncone P.J.Ch., whose address is 206 Courthouse Lane, Toms River, New Jersey, 08753. You must also send a copy of your opposition papers to the Plaintiff's attorney whose name and address appears above, or to the Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and pay the required fee and serve your opposition upon your adversary, if you want the Court to hear your opposition to the injunctive relief the Plaintiff is seeking.

5. The Plaintiff must file and serve any written reply to the Defendant's Order to Show Cause opposition by the _____ day of _____, 2023. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge Troncone.

6. If the Defendant does not file and serve opposition to this Order to Show Cause, the application will be decided on the papers on the return date and relief may be granted by default; provided that the Plaintiff files a Proof of Service and a proposed form or Order at least three (3) days prior to the return date.

7. If the Plaintiff has not already done so, a proposed form of Order addressing the

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Toms River, NJ 08753

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relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court no later than three (3) days before the return date.

8. Defendant shall take notice that the Plaintiff has filed a lawsuit against you in the Chancery Division of the Ocean County Superior Court of New Jersey. The Verified Complaint attached to this Order to Show Cause states the basis of the lawsuit. If you dispute this Complaint you or your attorney must file a written Answer to the Complaint and Proof of Service within 35 days from the date of service of this Order to Show Cause; not counting the day you received it.

9. These documents must be filed with the Clerk of the Superior Court in the county listed above. You must also send a copy of your Answer to the Plaintiff's attorney whose name and address appear above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: opposition to the Order to Show Cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief Plaintiff demands.

10. If you cannot afford an attorney, you may call the Legal Service office in the county in which you live. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

11. The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause, unless the Court and parties are advised to the contrary no later than seven (7) days before the return date.

Dated:

HON. MARK A. TRONCONE P.J.Ch

r|m|s|h|c

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