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FEATURED

# Trenton clerk sued for ignoring records requests in favor of 'mudslinging, drama'

By Isaac Avilucea [iavilucea@trentonian.com](mailto:iavilucea@trentonian.com) @IsaacAvilucea on Twitter  
Feb 15, 2021







Trenton city clerk Matthew Conlon, with the megaphone, speaking at a candlelight vigil.

Rich Hundley III for The Trentonian

TRENTON — Someone has been a busy bee.

Trenton clerk Matthew Conlon neglected his duties as public records custodian to focus on settling scores with city officials, according to a lawsuit.

Mike Ranallo, a resident and gadfly in Trenton's West Ward, said in his complaint that the city has blown off five of his Open Public Records Act requests. One of them has been outstanding for six months.

Conlon provided excuses to Ranallo about why the requests were taking so long to fulfill and assured him he'd get the records over to him.

So far, Conlon hasn't made good on those promises.

"The internal mudslinging and drama that has plagued Trenton over the past year seems to be standing in the way of the Clerk fulfilling his statutory duties and granting access to government records," attorney C.J. Griffin, who represents Ranallo, wrote in a complaint filed this month.

The complaint points to newspaper articles about the clerk's frequent dustups with colleagues.



Since arriving in August, Conlon has threatened to sue councilman Jerell Blakeley, got in a grudge match with deposed law director John Morelli, filed a police report against a *Trentonian* reporter and filed an ethics complaint against eight city officials.

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Attorneys for Plaintiff,

**Michael Ranallo**

MICHAEL RANALLO,

Plaintiff,

v.

CITY OF TRENTON and MATTHEW  
CONLON, in his official capacity as Records  
Custodian for the City of Trenton,

Defendants.

: SUPERIOR COURT OF NEW JERSEY  
: LAW DIVISION: MERCER COUNTY  
: DOCKET NO.:Civil Action

VERIFIED COMPLAINT

Plaintiff Michael Ranallo, through his undersigned counsel, Pashman Stein Walder  
Hayden, A Professional Corporation, complains against Defendants City of Trenton and

Matthew Conlon (collectively, "Defendants") as follows:



Matthew Conlon (collectively, Defendants) as follows:

### INTRODUCTION

1. This is an action alleging violation of the New Jersey Open Public Records Act (OPRA), N.J.S.A. 47:1A-1 to -13, (“OPRA”) and the common law right of access.
2. Plaintiff files this lawsuit to compel the City of Trenton to respond his OPRA request, which were filed months ago. There is no reasonable basis for the delay.

### PARTIES

3. Plaintiff Michael Ranallo is a resident of Trenton, New Jersey.
4. Defendant City of Trenton is a public agency formed under the laws of New

The clerk went after Blakeley for questioning Conlon’s legal credentials at a meeting last year.

Records show the clerk spent time compiling and sending a 34-page bar complaint to state attorney ethics officials asking them to disbar Morelli. The bar complaint was written on official city clerk letterhead.

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**MATTHEW H. CONLON, RMC  
MUNICIPAL CLERK**



**OFFICE (609) 989-3187  
FAX (609) 989-3190  
clerk@trentonnj.org**

**OFFICE OF THE CITY CLERK  
CITY OF TRENTON**

**319 EAST STATE STREET • TRENTON, NEW JERSEY 08608**

**Via Facsimile and Certified Mail**

**October 7, 2020**

**John J. Zefutie, Esq  
Colella Zefutie, LLC  
116 Village Blvd., Ste. 200  
Princeton, NJ 08540**

**Re: District VII Complaint against John Morelli, Esq.**

**Dear Mr. Zefutie:**

**I regretfully, but not reluctantly, write with regard to what I believe to be a serious breach of the**



**Rules of Professional Conduct by Mr. John Morelli, Esq. while serving in his capacity as City Attorney for the City of Trenton. I presently serve as the Trenton Municipal Clerk and in that capacity, I am the complainant. I have been the Municipal Clerk since August 28, 2020.**

## **Section I. INTRODUCTION AND SALIENT FACTS**

### **Preliminary Statement**

**This complaint regards the direct intentional breach of the attorney client privilege in violation of Rule 1.6, the separate inadvertent breach of confidential attorney client privileged information under Rule 1.6(f), violation of the duty to zealously represent and communicate with a client (or provide for their zealous representation) under Rules 1.3, 1.4 and failure to avoid, and in fact, fostering conflicts of interest in violation of rules 1.7 and 1.8 including the duty to avoid conflicts of interest, the duty to notify clients of conflicts of interest, the duty to not utilize information gained for personal benefit from conflicts of interest, and failures and accountability for the acts of others under Rule 5.1. This complaint also contains concerning information regarding a statement admitting that a party would suborn perjury to conceal these acts.**

**Page 1 of 14**

In a \$3 million tort claim notice, Conlon went on to accuse Blakeley and members of Mayor Reed Gusciora's administration of engaging in a conspiracy with a newspaper to retaliate against him for allegedly being a whistleblower.





Conlon tapped out complaints to state, local and federal authorities with allegations ranging from wiretapping to reporters unlawfully obtaining information about him and his checkered past, which includes a nolle prosequi in Florida.

One of two outside law firms called on to investigate Conlon recommended that he be disciplined for trying to intimidate and harass Blakeley for the October outburst about his legal background.

Another firm is investigating Conlon's credentials after he claimed to have passed the New Jersey bar exam in 2012, though his name doesn't appear on published lists of successful candidates.

Griffin, who has also represented *The Trentonian* in several public-access lawsuits, said her client was "very patient" and allowed adequate time for the clerk's office to respond to his OPRAs after the state relaxed a seven-day deadline for municipalities and public agencies to fulfill requests.

Despite the public health emergency, Conlon was still supposed to make an effort to respond to the requests within seven business days or "as soon as possible thereafter."

On Aug. 3, Ranallo asked for records of people who were fined for illegally dumping in the city.

The clerk responded Dec. 28 that getting the records to Ranallo wouldn't "be a problem if we keep a record which we should."



On Oct. 22, Ranallo asked for records showing the name of the supervisor that approves Trenton Water Works spokesman Michael Walker's timesheets and overtime.

The city was accused in a lawsuit of sweeping Walker's "astronomical" overtime gains "under the rug."

Instead, Ranallo received a ledger page of a "random customer" of Trenton Water Works.

When he followed up, he was told to amend his request because the request for information was invalid. Ranallo clarified that he was seeking documents.

"This is done at TWW and I will forward to the new director," Conlon responded Dec. 28.







Mike Ranallo

Facebook

On Nov. 13, Ranallo asked for the city contract with Front Row Seat Productions, the firm that helped with last year's fateful production of Gusciora's State of the City address at the new Trenton Central High School.

Contracts are required to be immediately provided to requesters.

Conlon explained that the request was assigned to the wrong department and that he would acquire the contract and forward it on, which still hasn't happened.

On Dec. 5, Ranallo asked for some of the clerk's emails related to "RICO" and the FBI.

Emails logs show Conlon wrote to the FBI, among others, accusing Blakeley and a *Trentonian* reporter of committing felonies against him as part of an alleged citywide "Rico Conspiracy."





The clerk said he was having the request shipped out to special counsel. None of the emails have been turned over.

Finally on Jan. 2, Ranallo asked for complaints and violations issued to the owner of a property on the 200 block of South Broad Street.

“It should not be this difficult to get public information or feedback from the Clerk’s Office,” Ranallo said by email. “It is a shame they force taxpayers into taking this kind of action. Residents should demand excellence from our local government, and this expectation extends to the Clerk’s Office as well.”

Conlon didn’t respond to an emailed request for comment.

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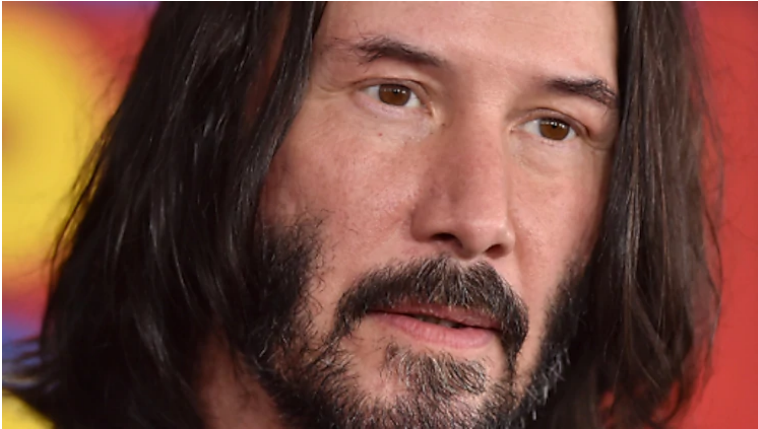
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## Isaac Avilucea

@IsaacAvilucea on Twitter

Isaac Avilucea is The Trentonian's main municipal scribe. A two-time prior restraint winner and testicular cancer survivor, he relishes his reputation as the "Mean Girls" reporter that followed his 18-day stay at the now-defunct North Adams Transcript.

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