

3. In February 2024, Mr. Roche and his wife entered into an agreement to sell the Haddonfield House. See Brennan Cert., Ex. A, 16:12-20.

4. The closing for the Haddonfield House occurred on April 10, 2024, although Mr. Roche and his wife did not attend. See Brennan Cert., Ex. A, 17:5 – 18:4.

5. To effectuate the conveyance of the Haddonfield House, Mr. Roche and his wife executed a Seller's Residency Certification/Exemption required by the State of New Jersey which indicated their address to be 2126 Connecticut Avenue, Northwest, #75, Washington, D.C. 20008 ("the Washington, D.C. Apartment"). See Brennan Cert., Ex. A, 21:4-16.

6. The Seller's Residency Certification/Exemption signed by Mr. Roche and his wife included a Declaration which provided, in relevant part: "The undersigned understands that this declaration and its contents may be disclosed or provided to the New Jersey Division of Taxation and that any false statement contained herein may be punished by fine, imprisonment, or both. I furthermore declare that I have examined this declaration and, to the best of my knowledge and belief, it is true, correct and complete." See Brennan Cert., Ex. A, 18:17 – 19:23.

7. Mr. Roche and his wife entered into a lease for the Washington, D.C. Apartment on March 28, 2024, which is the same date recited in the deed they gave for the Haddonfield House. See Brennan Cert., Ex. A, 22:1-20.

8. The lease that Mr. Roche and his wife entered for the Washington, D.C. Apartment was for a two-year term and obligated them to a monthly rental payment of \$8500.00. See Brennan Cert., Ex. A, 23:1-5.

9. Mr. Roche and his wife had lived in Washington, D.C. approximately 30 years ago and their daughter attended George Washington University. See Brennan Cert. Ex. A, 24:3-5.

10. Mr. Roche also began his position an adjunct professor at Catholic University in December 2023 and he taught his class in person. See Brennan Cert., Ex. A, 46:13 - 47:12.

11. When Mr. Roche and his wife moved from the Haddonfield House to the Washington, D.C. Apartment, they took all of their possessions with them with the exception of some miscellaneous items including Christmas decorations, a kitchen table and some of their children's memorabilia which they left at Mr. Roche's wife's mother's residence in Cherry Hill. See Brennan Cert., Ex. A, 26:12 – 27:7.

12. Mr. Roche is employed by Leo Wealth as an investment advisor for families and private businesses. See Brennan Cert., Ex. A, 6:22 – 7:5.

13. Several times a year Mr. Roche travels to Leo Wealth's offices in Manhattan and Iselin, New Jersey; otherwise, he works out of his home office. See Brennan Cert., Ex. A, 8:11 – 9:15.

14. Since April 15, 2024, Mr. Roche has maintained his home office at the Washington, D.C. Apartment. See Brennan Cert., Ex. A, 9:16-22.

15. Mr. Roche's home office includes a desk, a couch, a printer and filing cabinets. See Brennan Cert., Ex. A, 25:25 – 26:5.

16. At or around the same time that Mr. Roche and his wife entered into a lease for the Washington, D.C. Apartment, Mr. Roche also obtained a lease agreement for the property located at 647 Pomona Avenue in Haddonfield owned by Robert Seiger ("the Seiger Residence"). See Brennan Cert., Ex. A, 27:17 – 28:5.

17. Mr. Seiger never signed the lease agreement for the Seiger Residence. See Brennan Cert., Ex. A, 28:17-24.

27. After moving to Washington, D.C., Mr. Roche participated in four meetings of the Board of Commissioners, including two in April 2024 and two in May 2024. See Brennan Cert., Ex. A, 48:6-13.

28. At the May 13, 2024, the Board of Commissioners, including Mr. Roche, voted 2-1 to designate defendant Woodmont Properties, LLC as the conditional redeveloper of the residential portion of the so-called Bancroft Property and adopted Resolution No. 2024-05-13-021WS to memorialize the same. See Resolution No. 2024-05-13-021WS, attached to Brennan Cert. as Ex. B.

29. Mr. Roche tendered his resignation from the Board of Commissioners on May 28, 2024, with an effective date of May 31, 2024. See Brennan Cert., Ex. A, 11:4-7.

BARON & BRENNAN, P.A.
Attorneys for Plaintiffs

/s/ Jeffrey M. Brennan
JEFFREY M. BRENNAN, ESQUIRE

Dated: December 20, 2024