

**FILED**

**JUL 17 2019**

*Heather Joy Baker*  
**CLERK**

**SUPREME COURT OF NEW JERSEY  
D-100 September Term 2018  
082636**

**IN THE MATTER OF :**  
**JOHN F. RUSSO, JR., :**  
**A JUDGE OF THE SUPERIOR COURT : COMPLAINT FOR REMOVAL**  
**OF THE STATE OF NEW JERSEY : FROM OFFICE**

Heather Joy Baker, Clerk of the Supreme Court of New Jersey, on behalf of the Supreme Court of New Jersey pursuant to Rule 2:14 and N.J.S.A. 2B:2A-1 to -11, brings this Complaint for Removal from judicial office and says:

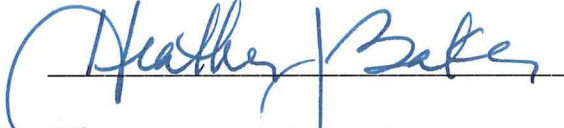
1. John F. Russo, Jr., (respondent) has been a Judge of the Superior Court at all times relevant to the allegations contained in this Complaint.

2. This Complaint incorporates and makes a part hereof as allegations the findings of fact of the Advisory Committee on Judicial Conduct regarding the matters contained in the Presentment of the Committee filed March 13, 2019 (ACJC 2017-225), and incorporates by reference the record before the Supreme Court, including the oral proceedings on the Order to Show Cause conducted before the Court on July 9, 2019.

3. The allegations concerning the conduct of respondent in the above matters, if true, show clear violations of Canon 1, Rule 1.1, Canon 2, Rule 2.1 and Rule 2.3(A); Canon 3, Rule 3.5, Rule 3.8, and Rule 3.17(B) of the Code of Judicial Conduct and Court Rule 1:12-1(g), and demonstrate respondent's unfitness for judicial office.

The filing of this Complaint constitutes the institution of formal removal proceedings as provided for by N.J.S.A. 2B:2A-3 and Court Rule 2:14.

Respondent shall file an Answer with the Clerk of the Supreme Court and the prosecuting attorney on or before August 19, 2019.

  
Heather Joy Baker, Clerk  
Supreme Court of New Jersey

Sworn and subscribed to  
before me this 17<sup>th</sup> day  
of July, 2019

  
Lauren Mignone

