

Based upon deposition testimony taken in Carifi II, Parsippany and Chief Philipps know that when Aurora Information Security & Risk, LLC (“Aurora”)¹ was initially retained, Aurora was not tasked with performing any work in connection with the only pending litigation involving Carifi but, rather, was tasked unlawfully to perform personal, politically-motivated searches of Carifi’s confidential police-department computer unrelated to any lawful or legitimate interest of Parsippany.

Those searches, which were unlawfully undertaken for personal political motives at the expense of Parsippany taxpayers, included both search terms allegedly developed by Parsippany as the “client,” as well as additional search terms developed independently by Aurora.

The search terms allegedly developed by Parsippany as “client” included the following:

James Carifi
Paul Carifi
Election
Contribution
Funds
ELEC
Clerk
Yancy Wazirmas
Jasmine Lim
Elesha Johnson
Board of Elections
Poll
Republican Party
Ballot
Absentee Ballot
Board of Education
Township Council
Mayor
James Barberio

¹ Aurora grossly over-billed the taxpayers of Parsippany for services allegedly provided. At the time Aurora was paid significant monies by Parsippany, Aurora was in fact suspended from do business in New Jersey with municipalities, rending Parsippany’s payments for Aurora’s services unlawful. When Parsippany’s attorneys asked Superior Court Judge Honigfeld to court-order Carifi to pay monies for Aurora’s work, Judge Honigfeld refused stating “there does not appear to be any record indicating that the Par-Troy governing body consented to hiring Aurora for services relating to [Carifi II], and it is also in dispute whether Aurora is licensed to conduct the investigative activity it billed for.” Judge Honigfeld held that the fees sought by Parsippany to compensate Aurora were “unreasonable and exorbitant.”

**Louis Valori
Robert Peluso
Brian Stanton
Vincent Ferrara
Michael dePierro
Jonathan Nelson
James Vigilante
Robert Colangelo
Danial Margotta
Bentley**

The search terms then added by Aurora as additional “suggested keywords” included the following:

**Carifi
Campaign
Paul
“campaign and mayor”**

ACFI2013-14928-JM-INDIA KEYWORD HITS 02152013
Aurora Suggested Keywords

	<u>KEYWORD CONSIDERATIONS</u>		<u>SEARCH HITS (Feb 13, 2013)</u>		<u>SEARCH HITS (Feb 14, 2013)</u>		<u>SEARCH HITS (Feb 15, 2013)</u>		<u>COMMENTS</u>		<u>SUGGESTED ACTIONS</u>	
1			0		42		N/A		N/A			N/A
2	Carifi campaign		37		137		176		N/A			N/A
3	(Personal Email Addresses)	LEGAL APPROVAL REQUESTED	0		110		N/A		Does counsel have personal email address to run already?			N/A
4	Paul		0		10		N/A		Look for personal email of information to personal accounts.			N/A
5	"campaign and Mayor"		0						Keywords can be compounded			N/A
6												
7												
8												
9												
10												

ANALYSIS FOR CONSIDERATION

Identify Popular Email Addresses

Example: MSN, yahoo, Gmail, etc.
Reason: Identify Personal Accounts used to potential misconduct

Identify Searches Conducted on the computer

Google Searches, Internet History, etc.

Web Credit Card Transaction Receipts

mailto: items

emails sent to (if possible)

URL (http, https, ftp, ftps)

web addresses typed

Example: ...@...com, ...@...edu, ...@...gov,
...@...net, ...@...org, ...@...any email
address>

Do any specific email accounts come to mind?