

**UNION COUNTY  
WATCHDOG ASSOCIATION**

*Shining a Light  
on Government*

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202 Walnut Avenue • Cranford, New Jersey 07016

October 3, 2011

Willard C. Shih, Esq.  
Wilentz, Goldman & Spitzer, P.A.  
90 Woodbridge Center Drive  
Suite 900 Box 10  
Woodbridge, NJ 07095-0958  
**VIA CERTIFIED MAIL**

Re: Netta Architects, LLC

Dear Mr. Shih:

In response to your letter of September 28, 2011 please be advised that Bruce Paterson is not accessible at this address as he is not an officer or trustee of the UCWA.

The only Youtubes we could locate are clips of a public meeting and we do not believe they contain anything defamatory:

1. Tina Renna Being Shushed <http://www.youtube.com/watch?v=JQPA5ONu-hQ>
2. Netta Architects change order <http://www.youtube.com/watch?v=3tiWJ3ZcVPA>

The UCWA had access to a private video streaming service called Veotag. As a courtesy please be advised that Veotag services were closed down end of July 2011 and I was told that their servers were turned off with their database migration that hosted content. We no longer have access to those videos, and to the best of my knowledge they are no longer in the public domain.

The County Watchers blog posting "The Netta Incident" includes an unedited very long rebuttal signed by Netta Architects, Jennifer L. Netta, Director of Business Administration and Operations.

The UCWA has had a similar request to remove content from our blog in the past. Without burdening the resources of the ACLU of NJ with this new request, which appears to me, a citizen with no legal background, to be of the same legal standing, I have enclosed their response to that incident as I believe it pertains to your client's request.

The UCWA is under the opinion that the Union County administration under ex-county manager George Devanney had a history of abusing the 'fair and open' process of awarding contracts along with a history of hiding such activity and abusing citizens and

**Our Mission**

*The Union County Watchdog Association, Inc. is a nonpartisan, nonprofit 501(c)3 organization working on behalf of residents and taxpayers to monitor Union County government and advocate for the elimination of waste, corruption and incompetence. We believe that good government can only be achieved through a system of checks and balance - a system that includes the watchful eye of the people.*

organizations (like the UCWA) that attempted to unearth the truth. We welcome Netta Architects anticipated openness and will gladly publicize their side of the story that your client is obviously eager to get out.

If Netta Architects would like to further explain the procurement process their firm went through to secure their Union County contracts and the process regarding the change orders and the reason behind them for the Court House project in particular, and what the total amount of the contracts between Netta Architects and Union County government is to date, they are welcome to do so on the County Watchers blog.

Please also include all contracts and work procured through their involvement with the Devanney family business Keyword Strategies and all fees paid to this business.

In addition, please invite your client to confirm that they have no personal relationship (now or in the past) with the Devanney family or any other Union County official who would have been instrumental in influencing the awarding of any contracts.

Please confirm whether your client ever spent a Holiday together or vacationed with the Devanney family or any other county employees or county officials including but not limited to Toscana on Grace Bay or any other location in the Caribbean, Atlantic City, etc. Also please have your client indicate their relationship with the Love Hope Strength Foundation and the costs incurred by Nick Netta for the Mountain Trek he took along with George Devanney through this non-profit.

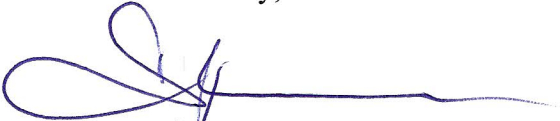
Please have your client list all gifts given to the Devanney family or any other county employees or county officials including but not limited to dinners, concert tickets, etc.

Please have your client list all political contributions to date.

Also, please invite your client to list all work performed for the Devanney family or any other Union County employee or official who would have been instrumental in influencing the awarding of any contracts including but not limited to architectural work and work performed by outside contractors that was arranged by Netta Architects.

We welcome your anticipated immediate response. We are willing to put whatever response you provide on our website unedited.

Sincerely,



Tina Renna

Enclosure



AMERICAN CIVIL LIBERTIES UNION  
of NEW JERSEY

FOUNDATION

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December 1, 2008

Ms. Tina Renna  
202 Walnut Street  
Cranford, New Jersey 07016

Dear Ms. Renna:

I have received your request for assistance regarding attempts by Union County to dissuade you from engaging in free speech activities. It is my understanding that you already defeated one legal challenge filed against you by a county official and that you recently received a "cease and desist" letter from an attorney representing a different county official that threatens another lawsuit.

It is unclear to me what specific statements made by you about the county manager or his wife are being alleged to be defamatory. Please request that information from the attorney and provide me with that information.

Ultimately, if a lawsuit were filed against you that did not state with specificity the alleged defamatory statements, that complaint should be dismissed. *See, e.g. Dello Russo v. Nagel*, 358 N.J.Super. 254, 817 A.2d 426 (App. Div. 2003) (dismissing case for failure to state a claim, explaining: "In order to properly plead a claim for libel or slander the defamatory words must be identified"). Indeed, as explained by the Appellate Division of the Superior Court of New Jersey: "In the case of a complaint charging defamation, plaintiff must plead facts sufficient to identify the defamatory words, their utterer and the fact of their publication. A vague conclusory allegation is not enough." *Zoneraich v. Overlook Hospital*, 212 N.J.Super. 83 at 101 (App.Div.), *certif. denied*, 107 N.J. 32, 526 A.2d 126 (1986).

You expressed to me your belief that the prior lawsuit and current "cease and desist" letter are part of the county's attempt to burden, or dissuade you from engaging in, your right to free speech. Please inform me of any further threats of lawsuit or any other actions taken against you by or on behalf of county officials from this point forward.

Sincerely,

Ed Barocas  
Legal Director