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LIBERTY HUMANE SOCIETY,
DIANA H. JEFFREY, NICOLE,
DAWSON, JOHN HANUSSAK and
MELISSA MOYLAN,

Plaintiffs,

v.

DONNA LERNER, LISA COONS,
JOSEPH PALADINO, "JOHN WOLF,"
"ALEX LAZUR," "BIFF SCHWARTZ,"
LORI MCREE HOFFMAN, JOHN AND
JANE DOE MODERATOR/
ADMINISTRATORS, JOHN DOES
1-10, and XYZ CORP., 1-10,

Defendants

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: FILED IN
MERGEFORMAT HUDSON COUNTY
DOCKET NO.:

Civil Action

COMPLAINT

Plaintiffs, by and through their attorneys, MYEROWITZ, JEFFREY & GLIDDEN, LLC, by way of Complaint against the Defendants state as follows:

PARTIES

Liberty Humane Society ("LHS") was during the relevant time period and continues to be a nonprofit corporation in the State of New Jersey. LHS holds a contract with the City of Jersey City to manage and operate the City's animal shelter, and provide weekend animal control services.

Plaintiff Nicole Dawson is the President of the Animal Welfare Society of New Jersey, a former LHS shelter manager, acting director for LHS and was at all relevant times a resident of Bridgewater, New Jersey. During the relevant time period, she was at first a volunteer with LHS, and then later hired by the Liberty Humane Society, as acting director of the animal shelter

Plaintiff Diana H. Jeffrey is a former President and current member of the Board of Directors of LHS, and was at all relevant times a resident of Bloomfield, New Jersey. During the relevant time period, she was a member of the Board of Directors of LHS.

Plaintiff John Hanussak is a current member of the Board of Directors of LHS, and was at all relevant times a resident of Jersey City, New Jersey.

Plaintiff Melissa Moylan was at all relevant times the spouse of Plaintiff John Hanussak.

Defendant Donna Lerner is and was at all relevant times a volunteer at the LHS, and upon information and belief, creator and moderator of the Facebook page, "Liberty Humane Uncensored." She was at all relevant times a resident of Randolph, New Jersey.

Defendant Lisa Coons is and was at all relevant times a volunteer at the LHS and a regular poster on the Facebook page, "Liberty Humane Society Uncensored." She was at all relevant times a resident of Bayonne, New Jersey.

Defendant Joseph Paladino is and was at all relevant times a regular poster on the Facebook page, "Liberty Humane Society Uncensored." He was at all relevant times a

resident of Sparta, New Jersey.

Defendant “John Wolf,” is an alias used by someone who regularly posts on the Facebook page “Liberty Humane Society Uncensored.”

Defendant “Alex Lazur” is an alias used by someone who regularly posts on the Facebook page “Liberty Humane Society Uncensored.”

Defendant “Biff Schwartz” is an alias used by someone who regularly posts on the Facebook page “Liberty Humane Society Uncensored.”

Defendant Lori McRee Hoffman is a resident of Bartonsville, Pennsylvania and leader of Monroe County No-Kill.

Defendants John and Jane Does Moderator/Administrators are responsible for moderating and/or administrating the Facebook page called “Liberty Humane Society Uncensored.”

John and Jane Does 1-99 are presently unknown persons who acted individually and in concert with the other named defendants.

FACTUAL BACKGROUND

In February, 2002, because of the historic problems with the Hudson County SPCA shelter (now dissolved), the City of Jersey City assembled a committee to assist with the creation and operation of a new city animal shelter.

Committee members included representatives of Jersey City Government, members of the Jersey City Council and representatives from four animal welfare groups in Hudson

County, including Liberty Humane Society, Hudson County Animal League, Companion Animal Placement, and Animals Need You. These four animal welfare groups formed a representative coalition aptly named the Animal Shelter Coalition.

Shortly thereafter, the City of Jersey City began operating a city animal shelter in a renovated garage located at 235 Jersey City Boulevard. By April, 2002, conditions at the shelter had deteriorated. Between April, 2002 and June, 2002, members of the Animal Shelter Coalition documented inhumane and unsanitary conditions at the shelter. These included: animals lying in their own waste and vomit; animals not receiving veterinary care; large dogs being kept in small cages and not getting any exercise; failure to vaccinate animals; ongoing poor sanitation, i.e., mold found growing in cages and feces accumulating around the facility; shelter often locked and unstaffed during operating hours; animals unnecessarily euthanized in lieu of adoption.

Members of the Animal Shelter Coalition reported these observations to city officials. On or about May, 2002, the Jersey City animal shelter committee decided to conduct a search for a competent shelter manager. The John L. Neu Family Foundation offered to match whatever moneys were obtained from the Geraldine R. Dodge Foundation to help pay the new shelter manager's salary.

Members of the Animal Shelter Coalition recommended plaintiff Nicole Dawson as the best candidate.

In June, the Liberty Humane Society received a \$25,000 grant from the Geraldine R.

Dodge Foundation to pay for the salary of a new shelter manager for the city's shelter. The John L. Neu Family Foundation matched the grant, to cover \$50,000 salary costs for a new shelter manager.

On or about July 14, 2002, plaintiff Nicole Dawson was hired by the City of Jersey City as the new Shelter Manager.

On or about February 4, 2004, the Council voted unanimously to give LHS a 45 year lease.

On or about July 14, 2004, the Defendant City of Jersey City's Council voted unanimously to give the LHS the management contract. The contract would commence on November 1, 2004.

Dawson served as shelter manager from July, 2002 to March, 2007.

Diana H. Jeffrey served as president of LHS from 2002 to 2004, as treasurer from 2005 to 2006, and resigned from the board on or about December, 2006.

Between 2007 – 2008, LHS embarked on a construction project to expand the facility to add additional space for dogs and cats.

As it is at most shelters in the United States, the euthanasia policy at the LHS shelter provided that an animal would be euthanized if suffering from terminal disease, mortal injury, or if its temperament made it a threat to public safety. Efforts would be made to find all other so-called "adoptable" animals new homes or place them with reputable animal rescue groups or other shelters, and avoid euthanasia if possible due to lack of space.

~~RECENT DEVELOPMENTS~~

On or about November, 2009, LHS hired a new Executive Director, with a grant from the John L. Neu Family Foundation.

Without authority from the Board of Directors, the new Executive Director unilaterally decided to abandon LHS's historic euthanasia policy and turned the shelter into a "no-kill" shelter, meaning animals would not be euthanized except in extreme situations.

The "no-kill" movement is an element of the animal rights movement that believes no dogs or cats should be euthanized unless extremely vicious/dangerous. Dogs with behavioral problems, even so-called "bully breeds" like Pit Bulls displaying forms of aggression, are not euthanized but are adopted into homes. Many "no-kill" shelters reject methods typically used by other mainstream shelters to determine an animals' temperament and do not engage in temperament testing.

"No-kill" shelters are usually privately run facilities that do not perform animal control duties and thus are not under a duty to pick up and house stray animals. They have the ability to pick and choose the animals they will accept and typically only select those animals which are behaviorally sound without any signs of aggression.

"No-kill" shelters only accept animals they have room for and that can be adopted out quickly.

The animals they reject are of course usually euthanized at some other shelter, or are abandoned by their owners.

Because the LHS shelter is an inner-city shelter serving the state's second largest city,

LHS is required to accept all stray animals from Jersey City and Hoboken, and impound them according to N.J.S.A. 4:19-15.16, LHS does not have discretion to select only adoptable animals and has no control over how many animals come into the shelter, or when.

Accordingly, under the new Executive Director's "no-kill" policy LHS quickly ran out of room which resulted in the shelter quickly becoming disastrously overcrowded and animal care suffered.

During the time the new Executive Director's "no-kill" policy was in place, the LHS shelter failed the only two inspections by state and local health authorities conducted, in November, 2009 and April, 2010.

Also as a result of the "no-kill" policy, shelter spending spiraled out of control during the period November, 2009 to July, 2010, threatening LHS's financial stability.

Because the largest single donor to LHS supported the new Executive Director, the Board felt helpless to deal with the situation. On July 15, 2010 the entire Board resigned abruptly.

Three former past presidents of LHS stepped in to form an interim Board. They included Plaintiff Diana H. Jeffrey, Laura Moss, and Bonnie Suozzo.

Six days after forming the interim board, on or about July 20, 2010, the interim board terminated the new Executive Director.

The interim Board asked Plaintiff Nicole Dawson to audit the existing shelter operation

to identify all problems and she agreed to do so on a volunteer basis.

The interim Board also asked Dawson and another former shelter manager to assist with getting dogs and cats out to other animals rescue groups, to ease the overcrowding.

To accomplish that goal, Dawson asked two nationally acclaimed animal welfare organizations, St. Hubert's Animal Welfare Center and the ASPCA in New York, to perform temperament tests on more than 100 dogs currently housed at the shelter.

On or about August 23, 2010 Dawson was hired as acting director.

When the interim Board took over they found conditions at the shelter much worse than anyone had imagined.

The shelter was housing approximately 275 cats and over 100 dogs in a facility designed to comfortably house no more than 80 cats and 50 dogs. Dangerous dogs had been hidden from public view, forcing adoptable dogs to be crammed into cages so small they could not stand up, turn around, or lie down. Sick animals were intermingled with healthy animals. Disease was rampant in the cat and kitten rooms, resulting in large numbers of felines succumbing to death after suffering for days.

In addition, the interim Board was informed that the New Jersey State Department of Health had inspected the facility twice within the last 6 months, failing it each time. On August 4, the State and local health authorities returned to do a follow up inspection, and in a letter dated August 13, this time gave LHS a deadline of one week to remedy the overcrowding and rampant spread of disease, or risk enforcement action, including closure.

The Board issued several public pleas for help and numerous animal welfare groups stepped up to the plate.

As a result, 60 dogs and 50 cats were sent to rescue groups, foster homes, or adopted out.

The ASPCA, St. Hubert's Animal Welfare Center, and Mt. Pleasant Animal Shelter sent teams of evaluators to evaluate the dogs – 90% of which were pit bulls.

As a result of those evaluations, 26 dogs were deemed too dangerous to be adopted or released to rescue, and were humanely euthanized.

Because the horrific conditions at the LHS shelter were publicized as the result of a failed “no-kill” policy, LHS, its Board members and Dawson became targets of those in the “no-kill” movement and others with personal agendas.

The Defendants and others used the “internet” specifically the social media site “Facebook” to defame the Plaintiffs by spreading misinformation and lies about the Plaintiffs; accusing Plaintiffs of illegal acts and unethical conduct; stating as fact that Plaintiffs euthanize animals because they enjoy it; uncovering private information about the Plaintiffs including work history and familial relationships; using vulgar, obscene, and increasingly violent language to describe Plaintiffs; repeatedly threatening Plaintiffs in order to intimidate Plaintiffs and cause them and their families alarm and keep Plaintiffs in a perpetual state of fear and anxiety; posting the Plaintiffs’ home phone numbers and addresses on the internet, called on others to contact the Plaintiffs for the purpose of

harassing the Plaintiffs which did in fact result in Plaintiffs receiving unwanted and harassing phone calls; and stated that it was their intent to harass the Plaintiffs to accede to their demands that the shelter re-institute the disastrous “no-kill” policy, and/or that Plaintiffs resign so that Defendants could take over LHS.

Some of the statements posted by the Defendants about the Plaintiffs or statements which Defendants allowed to remain on the Facebook page “Liberty Humane Society Uncensored” in their capacity as moderator or administrator of the page include:

This [Nicole Dawson] is the type of person you have who is euthanizing dogs for space and personal enjoyment, when there are homes and rescues available to take them.” Liberty Humane Society Uncensored moderator, August 23, 2010 at 8:01 pm

“Rumors have it that after Niki left, Camden found she was hoarding cats at the shelter in wire cages with fabric lining that is not impervious to moisture and germs. Didn't we hear at the board meeting this week that that's not a good thing.” Liberty Humane Society Uncensored moderator, August 23, 2010 at 10:13 pm

“I think it's a shame their low management mentality of killing dogs via false evaluations and liability phobia. Frank Cottone, August 24 at 7:34p

“I have sent an email to the star ledger and I am also contacting the NJ Bar Association regarding Diana Jeffrey's conduct. ” Alex Lazur, August 24 at 10:09pm

“They are killers plain and simple. There is no gray area.” Liberty Humane Society Uncensored moderator, August 25 at 6:40 pm

“Many of the volunteer favorite dogs have recently been red-carded, meaning only staff can handle them. ” Liberty Humane Society Uncensored moderator, August 24 at 11:28 pm

HYPERLINK "<http://www.facebook.com/profile.php?id=777464233>"Jessica Reid "Why do they red card them?" August 24 at 11:35pm

Joseph Paladino “that way they have an excuse to put them down.” August 25 at 12:00 am

“Very true Dave and the first change should be a shelter manager that does not lie and laugh about animals at risk..and allows volunteers and rescue people to save as many as possible..the take over should be by the local animal rescue / advocates to make the appropriate changes necessary...from what I understand the animals are not given a "fair" chance to LIVE...Trudie Purcell August 25, 2010 12:38 pm

“This place needs a lot of help..horrible things going on there...lies on the evaluation tests...innocent adoptable animals being killed...please join Liberty Humane Society UNCENSORED

and help. THERE MUST BE A CHANGE !!!" Trudie Purcell August 25 at 1:15 pm

"liars thieves and murderers" Lori McRee Hoffman August 25 at 2:10 pm

"We saw good dogs being failed purposely." Frank Cottone August 25 at 7:05 pm

"Niki and her crew are all murderers that should be locked up and throw away the key. That also includes Ms. Pia from St. Hubert's who fail so many." Lisa Coons August 25 at 9:33 pm

"bullshit. dont give them a dime til they stop murdering animals. i give all my money to those who save animals ALL the animals." Lori McRee Hoffman August 25 at 5:38 pm

"No, don't you see? They're euthanizing these dogs because they have so little space at the shelter! Samantha Hensley August 25 at 5:55 pm

"that is a lie they would like for us to believe. they are murdering animals that have homes waiting for them and rescues willing to take them. they are absolute bastards and they will answer to someone bigger than them. " Lori McRee Hoffman August 25 at 5:57pm

"The killed Fuller! Nikki talked Brian an adopter out of adopting him less than 24 hours ago, We now need to seek a grand jury investigation into this place and this means everyone calling the prosecutor and sheriffs office. We need to have a meeting and discuss this." Frank Cottone August 25 at 7:00 pm

"He was killed - even though he had a family that wanted to adopt him. Liberty "Humane". Nikki Dawson, Diana Jeffrey, Bonnie Yost, Laura Moss, came in and saved the day from the "hoarder" only to kill adoptable dogs and cats en masse. Why?" Steve Sachitelli August 25 at 7:45 pm

wtf kind of behavior evals are they giving these dogs? it seems VERY clear that the ladies who are doing the evals are setting the dogs up to fail. they seem to want to destroy the dogs in their care = unethical, immoral treatment of animals in their care. then they blame the past administration for the killing. really? it is so beyond inhumane. there should be no humane or shelter in the name of this place under the current administration. it is a dog pound, an institution made to destroy animals. " Sarah Keyishian August 26 at 12:05 pm

"niki is doing exactly what she did at camden county, she is an ego-maniac, narcissist, murderer. just ask any of the wonderful paid staff and volunteers from camden county that she forced out.

~~and all if the animals she needlessly killed. she should never be allowed to work in a shelter. she is evil.~~ Jennifer Strassberg Connors August 26 at 11:28 am

"I posted the following on Libety's page & of course it got deleted! :

So I hear Liberty's Board members are MURDERING perfectly adoptable dogs by failing them on purpose?????!!!!!! You people make me SICK!....and the public is being informed!!!!" Kathleen Bracy August 26 at 1:31 pm

"I know a LOT about you, your board and your organization. You would be amazed at the people I've spoke to today. If you want to sit down and make this all work, great. If you want to accuse me of ridiculous things then enjoy. Anyone who has something to say to me can call me anytime (845) 386-9738. We have nothing to hide" Matt DeAngelis Pets Alive August 26 at 4:28 pm

"Liberty Humane is lying to everyone!! Liberty claimed that they were working very hard with Pets Alive!! Thats just another LIE!!!! They wont even return a single phone call!!! 11th Hour Rescue cannot even get a call back!!" John Wolf August 26 at 4:30 pm

"C'mon folks. These people are cockroaches. Once we shine the light on them they will scurry away." Matt DeAngelis Pets Alive August 26 at 4:29 pm

"You are messing with the wrong folks Liberty. Wave the flag of surrender and let us help you. WHY IN THE WORLD WOULD YOU HAVE SUCH A NAME. GIVE ME LIBERTY OR GIVE ME DEATH. I GUESS YOU CHOOSE THE LATER" Wanda DeJesus Jacobseon August 26 at 4:44 pm

"LIBERTY AND KILLERS TWO WORDS THAT SHOULD NOT BE USED IN THE SAME SENTENCE. WHAT THE HELL ARE YOU KILLERS THINKING? ARE WE NOT IN THE SAME CAUSE TO HELP ANIMALS? THIS WORLD SEEMS MORE SCREWED UP EVERYDAY. SICK BASTARDS." Wanda DeJesus Jacobsen August 26 at 4:51 pm

"LHS is trying to make an excuse to kill Chase, Krugman, and Milkbone!!! Pets Alive offered to help but they never get a call back. So have numerous other rescues. We have a place for Krugman, Chase, and Milkbone. Niki Dawson wont return calls to rescues. Call the cops if you have to. This woman is sick and she is sick and she is going to keep killing adoptable pets. They have made it nearly impossible to adopt or rescue a dog." John Wolf August 26 at 5:34 pm

"Diana Jeffrey is an outright liar!!!!" John Wolf August 26 at 7:03 pm

"She's a friggin' lawyer, isn't that the same thing?" Bitsy Jones August 26 at 11:45 pm

"they prefer to kill animals when there are adopters and rescues willing to take them " Linda Menyhart August 26 at 7:56 pm

"So Nikki Dawson, who may or may not be on the board, is probably illegally making decisions on which dogs get killed. . . . Niki told an employee she doesn't care what the (ASPCA) say, because she's going to put dogs down anyway...They have been euthanizing a lot of dogs, most of which are adoptable. THIS IS NOT RIGHT!" Jersey Gumdrops August 26 at 8:30 pm

"I wrote to the mayor of Hoboken today and she wrote me back promising an investigation she said she too has a dog and takes this very. Seriously hopefully something will be done " Julie Pulson August 26 at 10:55 pm

"HORRIFIC! it's like they WANT to be evil just to be evil. it's all fun and game til someone gets sent to hell...which is just exactly where niki killjoy belongs" Shelley Rutowski August 26 at 11:30 pm

"milkbone is on the kill list. milkbone has no business being on the kill list. Milkbone passed an eval in june by andy and madeline, and then again passed an eval by st huberts last week.. both with flying colors.milkbone will be killed for space, there is no other reasoning. Milkbone is a near perfect dog, and a very handsome boy. I doubt they will release milkbone to a home or rescue...they will find an excuse." Liberty Humane Society Uncensored moderator August 27 at 1:23 am"That is exactly what happened at Camden County Animal Shelter. She will just move from shelter to shelter killing as many as she can and ruining good programs in place to save the animals." Jennifer Strassberg Connors August 27 at 9:37 am

"niki dawson used to work for camden? anyone have more info on her?" Melissa Fupa August 27 at 11:31am

"Where are all the posts from Pets Alive asking who lhs is not responding when they offered to rescue animals? They have rescue organizations from all over the country reaching out and niki dawson doesnt return calls. That must be because she is very busy killing animals inside no time to call anyone back!" John Wolf August 27 at 10:40 am

"Call Mayor Zimmer Tell her whats happening. Rescues are being denied. Niki Dawson (Kwik Nikii)

is running a death camp!! And the taxpayers and voters are the ones paying for it! Mayor Zimmer call her now 201 420 2013" John Wolf August 27 at 12:14 pm

"They are working very hard to cover their tracks!!! Unfortunately for them I have proof as to the injustices that were committed at the Liberty InHumane Society!! No Kill Can Work but hey if you have killed dogs for almost 20 years how could u ever admit that it can be done with all that blood on your hands!!!!" John Wolf August 27 at 4:53 pm

"Pets Alive offered to pull dogs. They also donated a thousand dollars to LHS and offered to pull more dogs. They also said that if they pull all the dogs would lhs be willing to have him come, volunteer, donate, and teach lhs how to be a successful no kill. At that point the very intelligent John Hanussak felt that he was being given an ultimatum. Pets Alive tried to make a big change and help but was shot down by a simpleton. " John Wolf August 27 at 7:26 pm

"If the geniuses running Liberty Humane would rather kill dogs then it's your responsibility to get them out of there and get things the way they are supposed to be. WE ARE NOT ABANDONING THE FIGHT. WATCH. THERE'S A LOT MORE COMING." Matt DeAngelis Pets Alive August 27 at 9:11 pm

"Dear Niki, You have never seen a no kill facility succeed because you were too busy murdering animals. RIP Niki " Lori McRee Hoffman August 28 at 10:45 am

"Yes RIP Niki." Wanda DeJesus Jacobsen August 28 at 11:46 am

"If they want us to stop complaing about the killing, they're going to have to stop the killing. They are killing adoptable animals and lying about it, just to meet an arbitrary number of animals they want to have to care for. " Steve Sachitelli August 28 at 2:04pm

LHS wake the f up! You are a killing machine. You have no moral ground to stand on. You are behaving in an inhumane and unethical manner regarding the animals in your care! And...you are blaming it on EVERYONE else." Sarah Keyishian August 29 at 1:31 pm

"So why not stop making excuses and accusing Pets Alive of doing this for the publicity and SHUT UP and start doing this the way you need to do it so animals don't get killed." Matt DeAngelis Pets Alive HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1
HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1 HYPERLINK
"http://www.facebook.com/pages/Liberty-Humane-Society-Uncensored/121665741216260?
v=wall&story_fbid=123188427730658&ref=mf" August 28 at 9:02pm

"One of my favorite quotes of all time is by John Adams. "Facts are stubborn things; and whatever may be our wishes, our inclination, or the dictates of our passions, they cannot alter the state of facts and evidence.

LHS is a failure. Niki Dawson, from the emails I've gotten and the depositions we are starting to take, likes to kill animals.

Facts." Matt DeAngelis Pets Alive August 28 at 9:15 pm

"My friends...some of you don't get this. I'm going to say it again. These people are cockroaches. All you need to do is shine the light of truth on them and they will scurry into the dark. Stand up to them. Right and truth are on your side." Matt DeAngelis Pets Alive August 28 at 9:41 pm

"animal killers creep me out even worse after i watched a special about jeff dahmer the other nite on the discovery id channel. " Lori McRee Hoffman August 28 at 11:06 pm

"I love this letter. Miss Jeffrey. Thank you. Very informative. So everyone. Take a look at the shelter

mmm nice look at it. wow then tell her to show you the kill room and why she kills animals that are adoptable?" August 29 at 1:23 am

"Yes Trudie. Two dogs were murdered needlessly today. Miss Niki Dawson and Miss Diana Jeffrey believe that they needed to kill a dog to welcome in the weekend. And they did. They killed two homeless paws that needed a home. Every Homeless Paw Deserves A Home!

I wonder if their is a chance of me getting elected to the board? Miss Jeffrey? What do you think?" John Wolf August 29 at 12:45 am

"Well I know one had mange and that was curable and the other Doctor I believe was not dog friendly. Well Niki isn't friendly neither you don't see anyone here trying to euthanize her do you? Please no one answer that I don't want to know. don't tell me!" John Wolf August 29 at 1:06 am

"LHS has room. They are killing anyway!!! WE need to stop them now!!!" John Wolf August 30 at 10:29 am

HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1 " Yes, with all the murders they have committed already there is enough room for the other dogs- why are they continuing? What can we do short of cutting off their arms" Linda Smigelski August 29 at 11:18 am

"Dangerous Dog Act? Do you guys have a judge on staff there? Don't know who has been handing you that crap, but you are misinformed. Here's the law: HYPERLINK "http://www.animallaw.info/statutes/stusnjst4_19_1_4_19A_17.htm" \ "s4_19_20"http://www.animallaw.info/statutes/stusnjst4_19_1_4_19A_17.htm#s4_19_20

Waive liability? The shelter HAS no liability. Sigh. Again, you are misinformed." Matt DeAngelis Pets Alive August 29 at 3:14 pm

"Tell Diana We have not even started yet. And we will not stop. I know that Diana Jeffrey thinks that everyone is stupid but that's on the regular censored LHS site. Not here my friend!

Also for those of you who thought that this woman was real do a little investigation and you will see. Miss Jeffrey is trying to stop the bleeding and it won't work. They have lies on their side. And WE Have The Truth!" John Wolf August 29 at 3:39 pm

"Welcome Miss Jeffrey. hope that you like it!

HYPERLINK "<http://www.youtube.com/watch?v=E1WUMRgbPRO>" <http://www.youtube.com/watch?v=E1WUMRgbPRO>" Alex Lazur August 30 at 1:10 am

NOTE - THIS YOUTUBE VIDEO OF GUNS AND ROSES "WELCOME TO THE JUNGLE" VIDEO. SHOWS RIOTING, POLICE IN RIOT GEAR, A PERSON IN RESTRAINTS (LIKE A MENTAL PATIENT ABOUT TO UNDERGO ELECTRIC SHOCK THERAPY), WHILE LYRIC SAY "YOU KNOW WHERE YOU ARE/YOUR'E IN THE JUNGLE BABY/YOU'RE GOING TO DIE" AND THEN SHOWS A BODY COVERED WITH A SHEET BEING WHEELED OUT ON A STRETCHER

"This is a bunch of sickening drama. They are psychotic serial killers." Lori McRee Hoffman August 29 at 8:18 pm

"Is this next for LHS? Get ready volunteers I think it's coming. HYPERLINK "<http://www.facebook.com/profile.php?id=100000271569024>" <http://www.facebook.com/profile.php?id=254357233717>" <http://www.facebook.com/profile.php?id=254357233717>" Liberty Humane Society" Liberty Humane Society Uncensored August 29 at 8:20 pm

"I was just told that Niki and Miss Diana Jeffrey are thinking to block the rescues of the dogs that

were rescued and are waiting to be picked up!!! Just remember that 11th Hour Rescue has committed and is taking MilkBone, Krugman, Chase, Kim and Christie.

Now IF ANYTHING IS TO HAPPEN TO ANYONE OF THESE DOGS I URGE ALL OF YOU TO COME TO THE JERSEY CITY POLICE DEPARTMENT AND FILE CHARGES AGAINST LIBERTY HUMANE SOCIETY AND NIKI DAWSON PERSONALLY." Alex Lazur August 30 at 12:15 am

"Do you lay in bed at night and think of sticking a needle in a dogs arm and watching him breathe until every last breath? Is that what makes you tick Miss Jeffrey? I bet it does." Alex Lazur August 30 at 12:46 am

"Everybody. Tomorrow is a new day. Although the shelter has murdered and will continue to murder under the rule of the Jeffrey Administration you need to burn up the phone lines!!! Tell them of the atrocities occurring at LHS. I'm afraid for the dogs that are to be rescued. These people are sick and might even kill them because they enjoy it. Please call every single number listed and tell them what is going on at Liberty Humane They are killing and killing and they will not stop!1 We need all of these people on our side. Stop the killing now!!!" John Wolf August 30 at 12:58 pm

"Dogs that have passed evaluations but were savagely murdered anyway!!! Some dogs never even got the chance to have an evaluation. They were just murdered!!" Alex Lazur August 30 at 1:17 am

""WHY WHY WHY ARE ALL THESE ADOPTABLE ANIMALS BEING MURDERED ?????????????
HELLO ????? " Trudie Purcell August 30 at 4:12 pm

"NO MORE DEAD ANIMALS!! NO MORE KILLING! GET OUT YOU MURDERS!!!" John Wolf August 30 HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1 at 9:52 am

"Also if anyone has been threatened and or intimidated by Diana Jeffrey or any member of the board. Please contact me and I will send you to our legal team. We are not on the run. The truth is on our side. The lies, blood, and murder is on theirs!!" John Wolf August 30 at 10:03 am

HYPERLINK "<http://www.facebook.com/profile.php?id=1096837359>" Julie Kaplan Good, the more accounts we get of Niki's present and past behavior, the better. August 30 at 8:19pm

I think if Jeffrey runs a shelter and decides to imput her knowledge of liability and cause it to interfere with good adoptions, then we may have an ethics violation. I think if Jeffrey hires Dawson whom she is representing in a lawsuit against the city, this is a conflict of interest and we have a ethics violation. Go to the NJ Office of Attorney Ethics at HYPERLINK "<http://www.judiciary.state.nj.us/oae/index.htm>" \t "_blank"<http://www.judiciary.state.nj.us/oae/index.htm> and file a complaint. Michael Porowitz August 30

"Thank you Miss Burnheim for clearing up any misunderstandings regarding banning volunteers. The Red Cross was banned from Nazi Death Camps during World War 2. Is that where you learned of this practice? Funny you have 6 people that are incapable, inadequate, and out of the 6 one is even rumored to be inbred. "Would you like fries with that sir" ? So we have one option. Remove You All!" John Wolf September 4 at 4:31 pm

"No this is a witch hunt and they thought that they had won but they didn't. you unfortunately forgot to tie up a few loose ends in fact tampering is one of the words that you will be hearing also intimidation. You will be sued. you will lose. I have tapes. I have copies. I have everything that I

need and I'm going to use all of it!" Joseph Paladino September 4 at 4:20 pm

"LISTEN CLOSELY LIBERTY HUMANE YOU WANT TO KILL ? THEN DO NOT BE SURPRISED BY THE CONSEQUENCES OF ALL OF YOUR ACTIONS!" Alex Lazur August 30

"Well I know one had mange and that was curable and the other Doctor I believe was not dog friendly. Well Niki isn't friendly neither you don't see anyone here trying to euthanize her do you? Please no one answer that I don't want to know. don't tell me! " John Wolf August 29 at 1:06 am

"Well Board You think You are A Secret Society? This board will take this fight to your home, your work, wherever you go we will find you!! You are the hunted now. We played nice and you wanted to play hard Now We Will Hunt You! Some people like to kill animals. And others..." John Wolf August 31 at 8:05 pm

So from day one the taxpayers, volunteers, and staff have been conned into believing that these were just temporary positions and niki quick with the needle dawson was kind. Enough to volunteer her time as executive director and also brought her heartless 21 year old daughter Sara Dawson in at the taxpayer's expense. ... Do you think we don't have tapes and hours of talking in the euth room and also your last staff meeting??? See that's the problem Miss Dawson you creep around and you creep around until the coast is clear. Well you did. But I caught you and I'm going to make sure you never work at another place anywhere that has to do with animals. Remember the bite rooms in Camden? Why were all the dogs wet before you euthanized them? What if I told you I know everything that you have done because I am a real fan of your work. In fact your work is very much like what many people believe mine to be. ☺" John Wolf September 1 at 12:30 am

"A Demonstration will be held at each board members home starting next week. We will announce the time and date for each demonstration in the next 48 hours." John Wolf September 1, 2010 7:30 pm

"Diana lives in Bloomfield. Michele in Hoboken. Bonnie Weehawken. The others in Jersey City." HYPERLINK "<http://www.facebook.com/pages/Liberty-Humane-Society-Uncensored/121665741216260>" \t "_blank"~~Liberty Humane Society Uncensored~~ moderator September 1, 2010

"We will be posting addresses and will sending out an email blast to all of our supporters. If you need help attending please let us know and we will try to make arrangements for you to be with us in our time of need. " John Wolf

HYPERLINK "<http://www.facebook.com/profile.php?id=1436675106>" \t "_blank"Claire DeSantis I live in Bloomfield. Let me know when you're going to her house. I'll be there."

"I am not scared. I do not hide. I do not run. You people hide while you throw stones. I wont throw stones but I will make you all personally retain an attorney and I will sue you all. I asked to help. You ignored me. I could have saved many in fact almost all and you shunned me again that was twice, Now You Have One Last Chance with Me. Either contact me and deal and I will make this place successful and I will bring in the right outside funding to help LHS wor and you walk out smelling like roses. You and I can work if you let me. I'm not a kid. This is not a game to me. I'm here to save LHS. That's why I pressure Washed You Building, Took Your Trash, Made Donations,etc...Last chance for a board member to contact me!!!" Joe Paladino Septembr 3 at 2:15 pm

"This page was made to tell the truth. And it has. Not to have members of the board scared that we know the truth and have them post on here under fake names to try to take the pressure away from their atrocities. I don't want any board member on this site until all 6 of you are and ready to

deal. You failed the animals miserably for years. You failed the Jersey City Taxpayers and You failed the people who care. I have offered to help and you shunned me. I'm not a kid. I am however a very resourceful person and I will drag you in and out of court for things you can't even comprehend for all the injustices that you people have brought upon all of us." Joe Paladino September 3

"To anyone who might have or is making threats that will not help. We know that you are just angry and in the moment of things you can get heated but these people are the people that you do not want in your life. They hide because they have to. They have no truth. They have no heart. They are the 2nd coming of Evil Itself that G-d has warned us all of. We do not kill we do not hurt. But we will sue you and sue you until I buy your home at foreclosure!" Joe Paladino September 3

"Sorry that you guys were not with us when this page had to be created. LHS which is not us has killed many adoptable animals. They have lied about dogs failing evaluations so that they can put them to sleep. . . They have killed many animals, have given fictitious numbers as to how many, they have not released paperwork detailing who and for what reason, they had a volunteer ordering staff as to which animals to have killed, etc...this is a death camp and we are asking for the resignation of those perpetrating the murders of these innocent animals." Alex Lazur August 30 at 10:49 am

Oh, and for crying out loud. All the whining and conspiracy theorizing about Hanusack's (or whatever his name is) phone number...who does he think he is anyway -- a rock star?

Here's where we got it:

http://www.facebook.com/l.php?u=http%3A%2F%2Fwww.whitepages.com%2F5175%2Fsearch%2FReplay%3Fsearch_id%3D74041331417841396020%26lower%3D2%26more_info%3D1%26form_mode%3Dopt_a&h=9a2ed \t "_blank" http://www.whitepages.com/5175/search/Replay?search_id=74041331417841396020&lower=2&more_info=1&form_mode=opt_a Matt DeAngelis Pets Alive HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1 HTMLCONTROL Forms.HTML:Hidden.1 HYPERLINK "http://www.facebook.com/pages/Liberty-Humane-Society-Uncensored/121665741216260?v=wall&story_fbid=124764367573064&ref=mf" \o "" \t "" Saturday at 7:56a

Our board has also been reading the allegations against our Mom, Niki Dawson, which we haven't made public yet. We have at least 10 people who have stepped forward with some amazing allegations. What you and your mom allegedly do to these dogs is the only twisted thing in all this.

While you try to discredit us rather than coming forward and admitting the truth, the truth has an interesting way of oozing out through the cracks. I can't wait to see what kind of "paperwork" you give to Mayor Zimmer in answer to her request." Matt DeAngelis Pets Alive September 5 at 9:15 am

"John Hanusak is freaking out. John you should step down from the board asap. You don't belong there." Liberty Humane Society Uncensored moderator September 4 at 7:43 pm

Yes, she [Niki Dawson] has to do some good public relations stories now for "damage control" It will be hard to undue her tarnished reputation. " Linda Menyhart September 4 at 1:44pm

<http://www.facebook.com/wienermom> ~~Lori McRee Hoffman~~ She is a murdering creep. September 4 at 2:00pm

Claire DeSantis She looks so pretty. Too bad she's related to the devil. September 4 at 3:15pm

I am calling a lawyer, I am very distressed over Justice and have been getting worse as I learn of more wrong doings. Also, from what I learned tonight, we need to pressure the decision makers in the city to permanently bar the current management/directors from ever participating in the LHS.
Frank Cottone September 2 at 10:55 pm

"Even if Nikki and Diana are passionate and care about the animals, they are doing the wrong thing. There is proof that at least a significant number of animals they had killed were adoptable."
Stephanie Welsher September 2 at 4:13pm

"Anyone who can squirt a dog in their face or leave a dead body on the floor and forget about it and then laugh doesn't care for animals." Sila May September 2 at 4:22pm

"they kill adoptable animals because they want to keep the numbers low enough to easily manage. 40 dogs can be walked and cleaned up after without as much effort as twice that many. dogs were killed with passing evaluations and with no evaluations .

They kill for space. And then they lie about it." Steve Sachitelli September 2 at 4:25 pm

"KAREN! OPEN YOUR EYES! They [Diana Jeffrey and Niki Dawson] are murderers who killed adoptable animals. It has been PROVEN. Since you know them so well why don't you ask THEM WHY?? We want to know to." Kristie L. Hendricks September 2 at 7:16 pm

55. On or about September 5, 2010, Defendants Donna Lerner, Lisa Coons and Joseph Paladino together entered the LHS shelter and demanded they be allowed to see a group of dogs that was scheduled to go to a rescue group that day. Defendants Lerner and Coons repeated these demands in a combative and hostile manner until a staff member finally relented. Defendant Lerner at all times conducted herself in a belligerent manner, verbally abusing the staff. She demanded to be allowed to volunteer and walk dogs and threatened the staff member that if LHS did not accede to her demands, she would commence litigation within two (2) days. Despite the staff member having told Defendants Lerner, Coons and Paladino to remain in the lobby of the shelter and not access other parts of the shelter, Defendant Paladino was later seen in the back of the kennel conversing with a kennel worker and upon information and belief, gave that kennel worker fifty (\$50) dollars in cash.

COUNT ONE**INVASION OF PRIVACY-INTRUSION ON SECLUSION**

Plaintiffs repeats each and every allegation contained in the foregoing paragraphs as if set forth at length herein.

The Defendants' actions constitute Invasion of Privacy - Intrusion on Seclusion, based on nature of their tortious conduct including stalking, surveillance, harassment, intimidation, coercion and threats of violence.

Defendants both individually and jointly invaded Plaintiffs' privacy by, stalking, surveillance, harassment, intimidation, coercion and threats of violence.

As a proximate result of the aforementioned acts, Plaintiffs have been damaged and have suffered severe emotional injuries, including mental distress and anguish.

WHEREFORE, Plaintiffs demand judgment against all Defendants, including, but not limited to:

- (a) An award of compensatory damages and punitive damages which are allowed by statutes pleaded herein or as permitted by common law, as well as any interest and costs of suit;
- (b) An award of reasonable attorneys' fees and costs of court which are allowed by statutes pleaded herein or as permitted by common law, and interest thereon;
- (c) Any other award and equitable relief allowed by statute, pursuant to the ethical and just power of the court, to which Plaintiffs are entitled;

- (d) An order directing Defendants to cease their unlawful acts;
- (e) An order directing Defendants to issue a written apology to Plaintiff for defamatory statements made, and disseminate same to relevant persons;
- (f) Any further prospective injunctive relief that the Court finds just and appropriate under the circumstances.

COUNT TWO

INVASION OF PRIVACY- FALSE LIGHT

Plaintiffs repeat each and every allegation contained in the foregoing paragraphs as if set forth at length herein.

The Defendants' actions constitute Invasion of Privacy – False Light, based on their public statements that unreasonably placed the Plaintiffs in a false light before the public.

Defendants knew their public statements were false and made them intentionally or in reckless disregard as to their falsity and the false light in which the Plaintiffs would be placed.

As a proximate result of the aforementioned acts, Plaintiffs have been damaged and have suffered severe emotional injuries, including mental distress and anguish.

WHEREFORE, Plaintiffs demand judgment against all Defendants, including, but not limited to:

- (a) An award of compensatory damages and punitive damages which are allowed by statutes pleaded herein or as permitted by common law, as well as any

interest and costs of suit;

- (b) An award of reasonable attorneys' fees and costs of court which are allowed by statutes pleaded herein or as permitted by common law, and interest thereon;
- (c) Any other award and equitable relief allowed by statute, pursuant to the ethical and just power of the court, to which Plaintiffs are entitled;
- (d) An order directing Defendants to cease their unlawful acts;
- (e) An order directing Defendants to issue a written apology to Plaintiff for defamatory statements made, and disseminate same to relevant persons;
- (f) Any further prospective injunctive relief that the Court finds just and appropriate under the circumstances.

COUNT THREE

DEFAMATION

Plaintiffs repeat each and every allegation contained in the foregoing paragraphs as if set forth at length herein.

The Defendants' actions constitute Defamation, based on the statements they made concerning Plaintiffs, which they knew were false, or were made with reckless disregard for whether they were false or not.

Defendants made the false statements and published the false statements, without just cause or excuse, constituting actual malice.

As a direct and proximate result of Defendants' tortious conduct, Plaintiffs have

suffered embarrassment, humiliation, emotional distress and mental anguish, injury to their professional reputations, loss of good will, economic damages and have been caused and will in the future continue to suffer damages.

WHEREFORE, Plaintiffs demand judgment against all Defendants, including, but not limited to:

- (a) An award of compensatory damages and punitive damages which are allowed by statutes pleaded herein or as permitted by common law, as well as any interest and costs of suit;
- (b) An award of reasonable attorneys' fees and costs of court which are allowed by statutes pleaded herein or as permitted by common law, and interest thereon;
- (c) Any other award and equitable relief allowed by statute, pursuant to the ethical and just power of the court, to which Plaintiffs are entitled;
- (d) An order directing Defendants to cease their unlawful acts;
- (e) An order directing Defendants to issue a written apology to Plaintiff for defamatory statements made, and disseminate same to relevant persons;
- (f) Any further prospective injunctive relief that the Court finds just and appropriate under the circumstances.

COUNT FOUR

DEFAMATION PER SE

Plaintiffs repeat each and every allegation contained in the foregoing paragraphs as if

set forth at length herein.

The Defendants' actions constitute Defamation *Per Se*, based on the statements they made concerning Plaintiffs, which they knew were false, or were made with reckless disregard for whether or not they were false.

Defendants made false statements and published false statements, alleging that the Defendants committed crimes and other unethical or immoral acts.

Defendants made false statements and published false statements ascribing to Defendants conduct incompatible with their lawful businesses, trades, or professions.

Defendants made the false statements and published the false statements, without just cause or excuse, constituting actual malice.

As a direct and proximate result of Defendants' tortious conduct, Plaintiffs have suffered embarrassment, humiliation, emotional distress and mental anguish, injury to their professional reputations, loss of good will, economic damages and have been caused and will in the future continue to suffer damages.

WHEREFORE, Plaintiffs demand judgment against all Defendants, including, but not limited to:

(a) An award of compensatory damages and punitive damages which are allowed by statutes pleaded herein or as permitted by common law, as well as any interest and costs of suit;

(b) An award of reasonable attorneys' fees and costs of court which are

allowed by statutes pleaded herein or as permitted by common law, and interest thereon;

- (c) Any other award and equitable relief allowed by statute, pursuant to the ethical and just power of the court, to which Plaintiffs are entitled;
- (d) An order directing Defendants to cease their unlawful acts;
- (e) An order directing Defendants to issue a written apology to Plaintiff for defamatory statements made, and disseminate same to relevant persons;
- (f) Any further prospective injunctive relief that the Court finds just and appropriate under the circumstances.

COUNT FIVE

CIVIL CONSPIRACY

Plaintiffs repeat each and every allegation contained in the foregoing paragraphs as if set forth at length herein.

The Defendants' actions constitute Civil Conspiracy.

The Defendants acted in concert to commit their unlawful acts and/or to commit their lawful acts by unlawful means against the Plaintiffs.

The Defendants' actions have resulted in damage to the Plaintiffs.

As a direct and proximate result of Defendants' tortious conduct, Plaintiffs have suffered embarrassment, humiliation, emotional distress and mental anguish, injury to their professional reputations, and have been caused and will in the future continue to suffer damages.

WHEREFORE, Plaintiffs demand judgment against all Defendants, including, but not limited to:

- (a) An award of compensatory damages and punitive damages which are allowed by statutes pleaded herein or as permitted by common law, as well as any interest and costs of suit;
- (b) An award of reasonable attorneys' fees and costs of court which are allowed by statutes pleaded herein or as permitted by common law, and interest thereon;
- (c) Any other award and equitable relief allowed by statute, pursuant to the ethical and just power of the court, to which Plaintiffs are entitled;
- (d) An order directing Defendants to cease their unlawful acts;
- (e) An order directing Defendants to issue a written apology to Plaintiff for defamatory statements made, and disseminate same to relevant persons;
- (f) Any further prospective injunctive relief that the Court finds just and appropriate under the circumstances.

COUNT SIX

TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS

Plaintiffs repeat each and every allegation contained in the foregoing paragraphs as if set forth at length herein.

The Defendants' actions constitute tortious interference with contractual relations.

The Defendants' actions interfered with the contracts between LHS and the Cities of

Jersey City and Hoboken.

The Defendants acted with malice and without justification.

The Defendants' actions were intended to interfere with the contracts between LHS and the Cities of Jersey City and Hoboken.

The Defendants' actions were without justification and have resulted in damage to the Defendants.

As a direct and proximate result of Defendants' tortious conduct, Plaintiffs have suffered embarrassment, humiliation, emotional distress and mental anguish, injury to their professional reputations, and have been caused and will in the future continue to suffer damages.

WHEREFORE, Plaintiffs demand judgment against all Defendants, including, but not limited to:

- (a) An award of compensatory damages and punitive damages which are allowed by statutes pleaded herein or as permitted by common law, as well as any interest and costs of suit;
- (b) An award of reasonable attorneys' fees and costs of court which are allowed by statutes pleaded herein or as permitted by common law, and interest thereon;
- (c) Any other award and equitable relief allowed by statute, pursuant to the ethical and just power of the court, to which Plaintiffs are entitled;
- (d) An order directing Defendants to cease their unlawful acts;

- (e) An order directing Defendants to issue a written apology to Plaintiff for defamatory statements made, and disseminate same to relevant persons;
- (f) Any further prospective injunctive relief that the Court finds just and appropriate under the circumstances.

COUNT SEVEN

INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

Plaintiffs repeat each and every allegation contained in the foregoing paragraphs as if set forth at length herein.

The Defendants' actions constitute Intentional Infliction of Emotional Distress. Defendants at all times herein engaged in a course of intentional and outrageous conduct designed to inflict emotional distress upon Plaintiffs. The actions of the Defendants were intentional, willful and wanton, outrageous and unconscionable.

As a proximate result of the above mentioned acts, Plaintiffs have been damaged and have suffered severe and permanent injuries and were forced to endure extreme pain, suffering and emotional distress and mental anguish.

WHEREFORE, Plaintiffs demand judgment against all Defendants, including, but not limited to:

- (a) An award of compensatory damages and punitive damages which are allowed by statutes pleaded herein or as permitted by common law, as well as any interest and costs of suit;

- (b) An award of reasonable attorneys' fees and costs of court which are allowed by statutes pleaded herein or as permitted by common law, and interest thereon;
- (c) Any other award and equitable relief allowed by statute, pursuant to the ethical and just power of the court, to which Plaintiffs are entitled;
- (d) An order directing Defendants to cease their unlawful acts;
- (e) An order directing Defendants to issue a written apology to Plaintiff for defamatory statements made, and disseminate same to relevant persons;
- (f) Any further prospective injunctive relief that the Court finds just and appropriate under the circumstances.

COUNT EIGHT

NEGLIGENT INFILCTION OF EMOTIONAL DISTRESS

Plaintiffs repeat each and every allegation contained in the foregoing paragraphs as if set forth at length herein.

The Defendants' actions constitute Negligent Infliction of Emotional Distress.

Defendants undertook a course of conduct which they knew or should have known would cause emotional distress and mental anguish to the Plaintiffs.

As a proximate result of the above mentioned acts, Plaintiffs have been damaged and have suffered severe and permanent injuries and were forced to endure extreme pain, suffering and emotional distress and mental anguish.

WHEREFORE, Plaintiffs demand judgment against all Defendants, including, but

not limited to:

- (a) An award of compensatory damages and punitive damages which are allowed by statutes pleaded herein or as permitted by common law, as well as any interest and costs of suit;
- (b) An award of reasonable attorneys' fees and costs of court which are allowed by statutes pleaded herein or as permitted by common law, and interest thereon;
- (c) Any other award and equitable relief allowed by statute, pursuant to the ethical and just power of the court, to which Plaintiffs are entitled;
- (d) An order directing Defendants to cease their unlawful acts;
- (e) An order directing Defendants to issue a written apology to Plaintiff for defamatory statements made, and disseminate same to relevant persons;
- (f) Any further prospective injunctive relief that the Court finds just and appropriate under the circumstances.

COUNT NINE

PUNITIVE DAMAGES

Plaintiffs repeat each and every allegation contained in the foregoing paragraphs as if set forth at length herein.

The actions of the Defendants constitute wanton and willful disregard of Plaintiffs by the Defendants and the harm that would come to the Plaintiffs as a direct result of the Defendants' wanton and willful behavior.

As such, the actions of the Defendants constitute a violation of New Jersey's Punitive Damages Act, N.J.S.A. 2A:15-5.9, *et seq.*

As a proximate result of the above mentioned acts, Plaintiffs have been damaged and have suffered severe and permanent injuries and were forced to endure extreme pain, suffering and emotional distress and mental anguish.

WHEREFORE, Plaintiffs demand judgment against all Defendants, including, but not limited to:

- (a) An award of compensatory damages and punitive damages which are allowed by statutes pleaded herein or as permitted by common law, as well as any interest and costs of suit;
- (b) An award of reasonable attorneys' fees and costs of court which are allowed by statutes pleaded herein or as permitted by common law, and interest thereon;
- (c) Any other award and equitable relief allowed by statute, pursuant to the ethical and just power of the court, to which Plaintiffs are entitled;
- (d) An order directing Defendants to cease their unlawful acts;
- (e) An order directing Defendants to issue a written apology to Plaintiff for defamatory statements made, and disseminate same to relevant persons;
- (f) Any further prospective injunctive relief that the Court finds just and appropriate under the circumstances.

JURY DEMAND

Plaintiffs hereby demand trial by jury of all issues in this action.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Plaintiffs designate Howard Z. Myerowitz as trial counsel in this matter.

CERTIFICATION PURSUANT TO R. 4:5-1

Plaintiffs, by their attorney, hereby certify that no other action regarding the matters alleged in this Complaint are related to any other existing case or controversy nor is any related action contemplated at this time.

MYEROWITZ, JEFFREY & GLIDDEN, LLC

By:

Howard Z. Myerowitz, Esq.
Counsel for Plaintiffs

Dated:

PAGE 1

