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April 9, 2013

Via E-mail and Regular Mail

Steven Secare, Esq.
Secare Ryan & Hensel
Ste 1A
16 Madison Ave
Toms River, NJ 08753-7574

Re: Stephen Stanziano/ Manchester Matter

Dear Mr. Secare:

This letter is in furtherance of my letter to Mr. Gelfand dated February 21, 2013. To the best of my knowledge no response to that letter has been received. Our client has, however, been the subject of further investigation. As you are aware it is our position that these investigations are nothing but a fishing expedition intentionally designed to "dig up" an unfounded basis upon which eventually to charge Mr. Stanziano with insubordination or dereliction of duty so as to oust him from his tenured position. It is also our position that these investigatory efforts constitute unlawful retaliation and our client has engaged in protected activities actionable under CEPA.

Enclosed herewith is a list of alleged improprieties that is referred to in my February 21, 2013 letter. My client requests that each of these alleged improprieties be properly and thoroughly investigated with the same degree of effort and zeal that Mr. Stanziano has been investigated. My client believes these alleged improprieties constitute illegal, inappropriate and/or unethical conduct in violation of state statutes and/or Township Administrative Code. Accordingly, by bring these alleged improprieties to the Township's attention my client is again engaging in protected activity and it is

unlawful to retaliate against him for doing so. Please be advised that this list may be amended if further alleged improprieties are revealed.

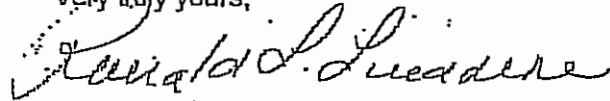
If no response is received by Monday, April 29, 2013 to our settlement overtures the Complaint will be filed and my client will proceed with protected activities with respect to the attached list.

I am not copying the Township Mayor or Administrator on this letter as you are the Township's Attorney. However, the enclosed list should be immediately forwarded to the Mayor and Business Administrator so my client's alleged complaints can be properly documented as received by the Township and then promptly investigated.

This letter shall not be admissible in any proceedings as it constitutes a settlement document. Evid. Rule 40B.

Thank you.

Very truly yours,

A handwritten signature in cursive script that reads "Ronald L. Lueddeke".

Ronald L. Lueddeke, Esq.

RLL/jms

Cc: Todd Gelfand, Esq.
Stephen Stanziano

List of Questionable Actions by Manchester Township Administrative Personnel

1. The award of contracts to the Township Tax Assessor Martin Lynch and Deputy Tax Assessor Raymond Hall for "Property Tax Reevaluation" in 2005, that was amended in 2008 for the provision of additional services and payment, and for an annual "Reassessment Program" in 2012.
2. The directive by Business Administrator Elena Zsoldos that I prepare political newspaper advertisements and other related literature and information for the campaign (using Township computers) to reelect Mayor Michael Fressola, Councilman Craig Wallis and Councilman Brendan Weiner. Councilman Weiner is married to the daughter of NJ State Senator Christopher J. Connors (R) of Legislative District 9. I prepared these items because I was fearful that if I did not, retaliatory action would be taken against me.
3. The order by Mayor Michael Fressola to his representative on the Planning Board, Donald Czekanski, to make the nomination of, and to vote for, Sanford Krasky as Chairperson of the Board, with the intent to deny Vice Chairman William Barron succession to Chairperson at the Board's January 2013 reorganization meeting. The reason for the Mayor's action is that William Barron's brother is said to have worked on the election campaign of the opposition candidates for the November 2012 municipal election. William Barron is related to Council President Craig Wallis.
4. The provision of a take-home vehicle for personal use to Chief Financial Officer and Director of Finance Diane Lapp by Business Administrator Elena Zsoldos for a period of approximately nine (9) months—take-home vehicles are reserved for emergency response personnel only.
5. The promotion of Maureen Kunitis, a Clerk for the Municipal Court, to the positions of Purchasing Agent and Personnel Officer by Mayor Michael Fressola as per the recommendation of Business Administrator Elena Zsoldos.
6. The investigation of a motor vehicle accident involving two (2) Department of Public Works employees and vehicles by Police Chief Brian Klimakowski and his subordinate police officers. One of the employees, Pablo Martinez, is the cousin of the husband of Business Administrator Elena Zsoldos. He was terminated as per the recommendations of both Business Administrator Elena Zsoldos and Township Attorney Steven Secare. As a result of the said investigation, Pablo Martinez was reinstated. There were many documented witnesses to the accident that I interviewed and recorded. The only witness interviewed by the Police Department was Matt Saldana, who is the nephew in-law to Business Administrator Elena Zsoldos, who changed his testimony from what he previously stated to me. The other employee involved in the accident was Mark Johnson.

7. The regular consumption of alcoholic beverages by Department Heads at lunch during the workday. This includes Business Administrator Elena Zsoldos, Chief Financial Officer Diane Lapp and Township Clerk Sabina Skibo.
8. Business Administrator, Eleana Zsoldos, purchased an iphone through the Township for her younger son's personal use. Within a few months, she replaced it with a new Iphone model, again for her son's use and again with the purchase being made with Township funds.
9. Business Administrator, Eleana Zsoldos, purchased a laptop computer through the Township for her younger son's personal use.
10. The Mayor's son, Steven is a real estate broker who handles ALL of the state mandated Affordable Housing sales in the Township. Steven Fressola receives a commission on all of these sales. No other broker handles these sales as they are funneled to Steven Fressola because of his relationship with the Mayor.
11. Mayor Fressola allows Christian religious services to be held in town hall every Sunday. The minister conducting these services is the Mayor's neighbor in Cedar Knolls. This causes the township to incur additional expenses (opening the township offices on Sunday) that are non-township related. This violates the Separation of Church and State doctrine.
12. Mayor Fressola recently purchased (through the Township) a 55" flat screen TV for his mayoral office. This TV is for the Mayor's personal use and does not serve the Township or its residents in any way.
13. Mayor Fressola and attorney Secare have held political meetings at Mr. Secare's office on Saturday mornings with a quorum of Township council members, conducting Township business.