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Yechezkel "Charlie" Schwab

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
OCEAN COUNTY  
DOCKET NO.

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YECHESKEL "CHARLIE" SCHWAB,      :
and DATAMAP INTELLIGENCE,        :
LLC,                              :           Civil Action
:
:           Plaintiffs,          :           COMPLAINT
:
v.                                  :
:
JOYCE BLAY, HERSHEL              :
HERSKOWITZ a/k/a HAROLD          :
HERSKOWITZ, SHLOMIE KLEIN       :
a/k/a SHLOMO KLEIN, ABRAHAM     :
SHARABY, JOHN DOES 1-10 and    :
ABC CORPS. A-J,                 :
:
:           Defendants.        :
:
:
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Plaintiffs Yechezkel "Charlie" Schwab and DataMap  
Intelligence, LLC, by way of their complaint against Defendants  
Joyce Blay, Hershel Herskowitz, Shlomie Klein, Abraham Sharaby,

John Does 1-10 and ABC Corps. A-J (collectively, "Defendants"), state and allege as follows:

1. Plaintiff Yecheskel "Charlie" Schwab, an entrepreneur, and his business, Plaintiff DataMap Intelligence, LLC ("DMI"), have been active in Lakewood, New Jersey and beyond for over a decade. Schwab's livelihood and his reputation are being threatened, however, as Defendants have falsely accused him of conspiring with local officials to obtain business.

2. Defendants have conspired to make numerous defamatory statements to the detriment of the Plaintiffs in public websites, blogs, and meetings to advance their own political agendas. The defamatory statements are demonstrably false, made with reckless abandon and without any evidentiary support (as there is none). They are intentional fabrications which assert that a hidden business relationship exists between Schwab, the current Lakewood Township Deputy Mayor Menashe Miller, and others, when no such relationship exists, either formal or informal. They accuse the two of engaging in illegal schemes to the detriment of the Township of Lakewood and its taxpayers.

3. Defendants have purposefully constructed and disseminated these deliberately false accusations to defame Plaintiffs. Their intent is to cause severe harm to Schwab's

financial interests, reputation, and his ability to conduct business, with the hope that Lakewood Township will cease contracting with his company, and to topple the current administration. They are part of a deliberate conspiracy to promulgate false information and to parrot the false information back and forth between the defamatory websites. There is absolutely no truth to these allegations, and this lawsuit is filed to put an end to Defendants' malicious accusations of criminal conduct and to recover compensatory and punitive damages for the injury they have caused to Plaintiffs by the repeated fabrications and defamation that Defendants disseminated, broadcast, and propagated.

#### THE PARTIES

4. Plaintiff Charlie Schwab is a resident of the State of New Jersey with an address at 22 Carasaljo Drive, Lakewood, New Jersey 08701.

5. Plaintiff DataMap Intelligence, LLC is a limited liability company formed under the laws of the State of New Jersey with an office located at 22 Carasaljo Drive, Lakewood, New Jersey 08701.

6. Defendant Joyce Blay is a resident of the State of New Jersey with an address at 311 Floral Way, Toms River, New Jersey 08755.

7. Defendant Hershel Herskowitz a/k/a/ Harold Herskowitz is a resident of the State of New Jersey with an address at 1496 Cedar Row, Lakewood, New Jersey 08701.

8. Defendant Shlomie Klein a/k/a/ Shlomo Klein is a resident of the State of New Jersey with an address of 189 Chateau Drive, Lakewood NJ 08701,

9. Defendant Abraham Sharaby is a resident of the State of New Jersey with an address of 1140 Mackenzie Court, Lakewood NJ 08701,

10. John Does 1-10 are individuals whose identities are currently unknown who have participated in the wrongful conduct set forth below.

11. ABC Corps. A-J are entities (corporations, limited liability companies, partnerships, etc.) whose identities are currently unknown who have participated in the wrongful conduct set forth below.

**FACTUAL ALLEGATIONS**

**A. Schwab and DMI**

12. Schwab is an entrepreneur who conducts business in Lakewood and beyond in the State of New Jersey.

13. Schwab is the founder of DMI and its sole member.

14. DMI is a data provider that creates, collects and provides proprietary, detailed mapping and demographic

information on virtually all new residential developments created each year, most of which are built on freshly minted unmapped streets. DMI collects its data directly from the source and updates this information bi-monthly. It uses the most current data on new developments available as well as propriety data it meticulously collects and archives from historical maps often no longer in the possession of municipalities. DMI has been in the business of providing mapping and data services to Lakewood Township, the Lakewood Police Department, the Lakewood Inspection Department, and other Township Departments for over 10 years.

15. Among other benefits of DMI's proprietary data is that municipalities using its data can immediately dispatch first responders to the scene of new developments, unmapped streets, and unmapped addresses whereas those municipalities without comparable data will have a time lag of even a few critical seconds before their responders can be directed to where they should report.

16. Schwab's other business interest and pursuit is real estate.

17. Schwab uses data analytics to identify real estate for himself or his entities to acquire. He developed proprietary software that revolutionizes the process by which

properties nationwide are identified, located and evaluated. The application contains data of over 100 million parcels of property. Schwab identifies properties based upon select search criteria, with the application sorting the property according to his search terms. Based upon these and other factors, Schwab identifies desirable properties.

18. Schwab's reputation is especially important to him because Lakewood Township and other large corporations are DMI's customers. While those within Lakewood are more familiar with Schwab because the Township has done business with him for over ten years, other municipalities and corporations are far less familiar with him. Accusations of misconduct directed towards Schwab cause municipalities and corporations to shy away from doing business with DMI.

**B. Defendants' Defamatory Statements**

19. Defendants have tarnished what should otherwise be Schwab's impeccable reputation by repeatedly making statements accusing him of no less than criminal conduct.

20. Defendants' statements are false and defamatory, made out of whole cloth.

21. Defendants made these statements (i) on websites and blogs that Defendants operate and/or contribute to; and (ii) in public meetings.

22. Defendants published these false, unproven, and unsupported allegations to disseminate knowingly false information about Schwab and to cause financial harm to him, DMI, and others. The accusations are easily proven to be false and are a deliberate attempt to interfere with Schwab's data collection and real estate businesses.

23. By defaming Schwab and DMI, Defendants intend to simultaneously smear the reputation of Lakewood Township Deputy Mayor Miller, who they accuse of being Schwab's co-conspirator in illegal activity. They do so because Defendants Herskowitz and Sharaby had, and upon information and belief, continue to have political aspirations for themselves and others they support to be elected to the Lakewood Township Committee, and Miller stands in their way as one of the candidates who has prevailed in that election on multiple occasions.

24. One website is jleaks.com ("jleaks") ostensibly administered by Moshe Kapoyer, a pseudonym. No one named Moshe Kapoyer exists. The owner of jleaks strictly conceals both its and Kapoyer's identity. The website routinely publishes false accusations against Schwab that have no factual basis.

25. For example, an article published on jleaks titled "Fifty Shades of Schwab" and subtitled "Many Names"

(dated August 22, 2018) contains the following false statements, among others:

- "Schwab & Menashe Miller own Datamap, Diamond Triumph Properties, LLC, Pinerock Lakewood LLC, Richatz LLC, North Lake Realty LLC, Land Baron LLC, DataMap Intelligence, DIAMOND TRIUPMH PROPERTIES LLC, PINEROCK CAPITAL LLC, PINEROCK LAKEWOOD LLC, CLIFTON ROCK LLC, NORTH LAKE REALTY LLC, LAND BARON LLC, LIPPENCOTT CAPITAL LLC, ANDY17 LLC, JANICEROCK LLC, RACK HOLDINGS LLC, LENNYROCK LLC, RIDGE ROCK HOLDINGS LLC, aka CHALDT ENTERPRISES LLC."
- "Another great source of income for Schwab & Miller is the mapping services Schwab & Miller provide for the township under the name of DataMap Intelligence. Miller has voted repeatedly to grant the mapping business to Schwab & Miller even though he gets 50% of the profits."
- "Most the time Schwab & Miller apply for a land acquisition or swap for an LLC that does not exist! Was never registered. Once the acquisition or swap is approved they go ahead and register."

26. These statements accusing Schwab of conspiring with Menashe Miller are false and defamatory. Miller is the Deputy Mayor of Lakewood Township and its former Mayor and committeeman. Miller has no interest, formal or informal, with any of the LLCs mentioned in the article. Miller is not a member of any of the LLCs, and Miller has no ownership or other interest in these entities that Schwab owns. Miller is not on the formation documents, on the operating agreement or on the



tax returns for any business interest that Schwab owns. It is false and defamatory to state that Schwab owns these entities with Miller, or that Miller receives 50 or any percent of their profits.

27. Even the title of the article, starting with "Fifty Shades...", is intended to portray Plaintiffs in a derogatory way as it is mimics the title of a movie many in the community view in a negative light.

28. As another example, a second article published on jleaks, titled "Schwab, Miller and Greeee\$\$\$\$eed" and subtitled "Why is the Lakewood Township Committee giving away very valuable commercially-zoned land to Charlie "Chatz" Schwab for bupkes?? Is America's most prolific land-swapper residing right here in our own little town?!? This just proves the age-old adage that its 'who you know' that counts..." (dated August 14, 2018), contains the following false statements, among others:

- "Mr. Schwab is the silent partner of Lakewood Committeeman Menashe Miller. Mr. Miller arranges a free land swap for himself while giving the town a dinky lot in exchange for prime real estate."
- "The way Schwab & Miller operate is simple... Schwab goes ahead and purchases a scrap of land next to township land, Miller gets the township to sell the township land in a private sale, Township Committee sells it for the assessed value to Schwab, Schwab sells the land for full price and splits the profits with Miller."

- "... as soon as he [Schwab] gets control of one of the parcels he can go ahead and conduct a private sale via his friends on the committee for the adjacent parcels."
- "Therefore, everyone makes good money - Schwab & Miller and also the individual who behind the scenes control CHEMED..."
- "... but Charlie has already arranged to pay the tax assessor value."
- "This is not the first time Schwab & Miller is getting free land from the township so he can split the spoils with Committeeman Menashe Miller."
- "He [Schwab] should probably be placed in the Guinness Book of World Records for his unmatched prowess of going this far without getting caught!"
- "In most of his swaps he used Starmark Appraisals to appraise the land and come up with fake numbers."
- "Well, in 2008 Rabbi Yidel Shain sued the Township of Lakewood for exchanging land for Miller & Schwab and he won!"

29. These statements contained in this second article are false and defamatory for the reasons set forth above. In addition, Schwab previously exchanged property with Lakewood Township. As with every land exchange with Lakewood Township, each of the Schwab transactions was approved by the Town Manager, the Town Attorney, the Tax Assessor, the Township Engineer, other Township Officials and Township Professionals and the Township Committee. The exchange abided by the law in

all respects, as it was an arms-length exchange of property based upon their values. Miller has no ownership or other interest in the property that Schwab obtained via exchange. There are no "fake" numbers in any of these transactions. Finally, the statements are defamatory because Rabbi Yidel Shain did not "win" any lawsuit against Schwab.

30. A second website is [hefkervelt.blogspot.com](http://hefkervelt.blogspot.com) ("hefkervelt"). This website also regularly prints false accusations against Schwab and DMI that have no factual basis.

31. For example, in an article published on [hefkervelt](http://hefkervelt) titled "Claim: a Land Swap Deal That will cost Lakewood Taxpayers While a Committeeman Can Profit off it" (dated August 14, 2018), the author states:

- "In less than 48 hours there is an ordinance up for second reading a property is being transferred to a corporation owned by a business associate and partner of A Lakewood Committeeman.
- "The committeeman gets the township to the sell the township land in a private sale, to a friend Township Committee sells it for the assessed value to a friend who sells the land for full price and can splits the profit..."

32. In the comments section of this article, Defendant Hershel Herskowitz wrote:

- "I am going to make this short and sweet. I can go on and list all of the corruption that Menashe and Meir have done together and separately along

with ... builders and developers..." [published on August 15, 2018 at 1:53 p.m.]

- "This deal is nothing compared to the scam that Menashe perpetrated with Schwab by secretly bringing Mr. Garzo to claim hundreds of undersized lots and suing the township. In reality Mr. Garzo was suing the taxpayers. And the entire case was orchestrated by Menashe Miller and his friend." [published on August 15, 2018 at 3:05 p.m.]
- "But how many lots and properties were sold, divided, switched and donated, all for personal gain since menashe [a]nd meir [h]ave been in charge?" [published on August 15, 2018 at 11:02 p.m.]

33. These and other statements contained on the website are false and defamatory. There was no "scam" that Schwab perpetrated with Miller "by secretly bringing Mr. Garzo to claim hundreds of undersized lots and suing the townships." Schwab did not "bring" Mr. Garzo to Lakewood. Mr. Garzo and his family had their claim before Schwab was born. Schwab does not have a financial interest in the claims of Mr. Garzo. To state otherwise is false and defamatory.

34. Herskowitz also uses his Twitter account to parrot these defamatory statements, and to publish links to the defamatory articles on Defendants' websites. The account prints false accusations against Schwab that are unsupported by any valid evidence.

35. For example, he tweeted:

- "Dinky piece of undersized property: \$100 Prime real estate in commercial zone: million\$ Having a friend (silent partner) on the committee to approve a land swap: pricele\$\$.

This is what the swamp looks like!"

[jleaks.com/schwab-miller-...](http://jleaks.com/schwab-miller-...)

He attached a link to, and screen shot of, this [jleaks](#) article, showing its headline, "Schwab, Miller and Greeee\$\$\$\$eed" and its subtitle, "Why is the Lakewood Township Committee giving away very valuable commercially-zoned land to Charlie "Chatz" Schwab for bupkes??" [August 15, 2018]

- He tweeted the same screen shot of the [jleaks](#) article on at least four other occasions on August 14, 2018 using words like "corruption," and "godfather of all crime."
- He attached a link to, and screen shot of, and article Defendant Blay wrote entitled, "Miller Lobbyist to Swap for Preservation Property at Costco-Brick Border," a defamatory article described in more detail below. He describes the article as "another thorough & damning piece," stating how Blay "meticulously lays out some of the pay-to-play our connected committeemen and their cohorts are up to." [August 14, 2018]

36. These and other statements contained on Herskowitz's Twitter account are false and defamatory for the reasons stated throughout this Complaint.

37. Upon information and belief, Defendant Shlomie Klein is the driving force behind both [hefkervelt](#) and [jleaks](#). When [hefkervelt](#) first became live, Klein used it almost exclusively for his publications. As for [jleaks](#), Klein is

connected to the website and its authors as Klein took the picture of Schwab accompanying the article, "Fifty Shades of Schwab" (dated August 22, 2018), on November 8, 2017, between approximately 5:30 and 7:00 in the Lakewood Township main lobby. Thus, Klein is involved in disseminating rumors, falsehoods, grossly inaccurate claims, and entirely unfounded conspiracy theories about Schwab and others. The sole purpose of these activities is to harm and disrupt the legitimate conduct of Schwab's business endeavors.

38. Defendant Joyce Blay routinely prints false accusations against Schwab and DMI on her website, NJ News & Views website, similar to those posted on jleaks and hefkervelt that have no factual basis.

39. Blay's website is located at www.joyceblaynewsandviews.com. In an article titled "Miller Lobbyist to Swap for Preservation Property at Costco-Brick Border," attributed to her, Blay accuses Schwab of conspiring with Miller to fleece the Township's taxpayers. To obtain maximum publicity for her blog, Blay uses words designed to inflame such as "money-making scheme," "get-rich-quick scheme," stating that Schwab and Miller jointly own companies that are profiting from this scheme.

40. Blay's accusations of essentially criminal conduct against Schwab and his companies (and Miller) are false and defamatory.

41. Blay asserts the following as facts in the article, which are not true:

- "In a March 7, 2018 post, NJ News & Views reported a business relationship between Schwab and committeeman Menashe Miller."
- "Last month, it was Leeds whose investment took second place to Miller and Schwab's money-making scheme."
- "By exchanging public land for private land based on the properties' assessed values, Schwab and Miller can flip their new acquisition for a profit at the appraised value."
- "That does not mean Miller and Schwab do not have an alternative get-rich-quick scheme."
- "But that is not what Schwab or Miller plan to do with their investment."
- "Instead of getting an undersized lot that would have reduced the value of Leed's property, while increasing the value of their acquisition to her, Schwab and Miller have set their sights on public property designated for preservation under the township's Smart Growth Plan."
- "For Schwab and Miller, there is a pot of gold at the end of the rainbow if the deal goes through, but not for Lakewood taxpayers."

42. These and other statements contained in the article are false and defamatory. Schwab and Miller have not conspired to engage in any "money-making", "get rich quick" or

any other "scheme" together; Schwab has no business plan that includes Miller; and on occasion, Schwab has held the property for over ten years prior to the property exchange. As explained above, there is nothing improper about the exchange, which was approved by numerous township officials. The exchange did not result in any acquisition of property by Schwab and Miller (this was not "their new acquisition") nor was there any "plan" for "their" investment, as Miller has no interest, ownership or otherwise, in the property Schwab received in the exchange.

43. Blay also wrote and published a second article on her website, entitled "OPRA Complaints Spell Double Trouble for Lakewood Twp. Clerk." The article identifies supposed wrongdoing by Miller and other Lakewood Township representatives, asserting wrongful conduct regarding services DMI provided the Township and payment related thereto.

44. Blay's statements in these two articles and others on her website are false and defamatory.

45. Defendant Abraham Sharaby is a member of the conspiracy against Schwab. Upon information and belief, Sharaby files frequent OPRA requests to gather documents relating to Schwab and his business interests. The purpose of these requests is not to review public information. Instead, Sharaby supplies these documents for Defendants to use to misrepresent,



distort, and promulgate false allegations about the personal and business activities of Schwab.

**COUNT ONE**

**Defamation**

46. Plaintiffs repeat and restate the allegations in the preceding paragraphs as if set forth in full herein.

47. As detailed above, Defendants made false and defamatory statements about Plaintiffs to third parties.

48. The statements were published with actual malice, as Defendants either knew the statements were false, they acted in reckless disregard of the truth or falsity of the statements before communicating them.

49. Defendants could not, and did not, believe that the statements were true, as there is absolutely no credible evidence demonstrating that Miller had any interest in properties that Schwab owned or that they were involved in any other scheme together, among other reasons.

50. Defendants' statements were communicated to third parties via the aforementioned websites which members of the public viewed, and during open public meetings.

51. Defendants' statements constitute defamation per se in that they accuse Plaintiffs of committing a crime and/or of misfeasance in business.

52. As a result of Defendants' conduct, Plaintiffs' business and personal reputations have been damaged.

53. Defendants' conduct was malicious and outrageous and warrants the imposition of punitive damages.

WHEREFORE, Plaintiffs demand judgment against Defendants for the following relief:

a. A permanent injunction requiring Defendants to remove the defamatory publications from jleaks, hefkervelt, the Herskowitz blog and NJ News and Views and prohibiting Defendants from publishing false and defamatory statements that state, in words or substance, that Schwab is doing business with Menashe Miller, and that the Plaintiffs are engaging in a criminal conspiracy with Menashe Miller.

b. A permanent injunction prohibiting Defendants from publishing false and defamatory statements that state, in words or substance, that Plaintiffs are engaged in an unlawful criminal conspiracy with Menashe Miller.

c. Punitive damages,

d. Compensatory damages,

e. Pre and post judgment interest,

f. Attorneys' fees and costs of suit,

g. Such other and further relief as the Court deems just, equitable and proper.

**COUNT TWO**

**False Light**

54. Plaintiffs repeat and restate the allegations in the preceding paragraphs as if set forth in full herein.

55. Defendants, as more fully described above, made statements about Schwab and/or DMI to third-parties.

56. Defendants' statements portrayed Schwab and DMI in a false or misleading light.

57. The information as disseminated is highly offensive or embarrassing to a reasonable person of ordinary sensibilities.

58. Defendants disseminated this information with reckless disregard as to its offensiveness.

59. Defendants' conduct was malicious and outrageous and warrants the imposition of punitive damages.

WHEREFORE, Plaintiffs demand judgment against Defendants for the following relief:

a. A permanent injunction requiring Defendants to remove the defamatory publications from jleaks, hefkervelt, the Herskowitz blog and NJ News and Views and prohibiting Defendants from publishing false and defamatory statements that state, in words or substance, that Schwab is doing business with Menashe

Miller, accuses Plaintiffs of engaging in a criminal conspiracy with Menashe Miller.

b. A permanent injunction prohibiting Defendants from publishing false and defamatory statements that state, in words or substance, that Plaintiffs are engaged in an unlawful criminal conspiracy with Menashe Miller.

c. Punitive damages,

d. Compensatory damages,

e. Pre and post judgment interest,

f. Attorneys' fees and costs of suit,

g. Such other and further relief as the Court deems just, equitable and proper.

**COUNT THREE**

**Conspiracy**

60. Plaintiffs repeat and restate the allegations in the preceding paragraphs as if set forth in full herein.

61. Defendants committed unlawful acts when they caused defamatory statements to be published about Schwab and DMI.

62. Defendants malevolently conspired with each other to defame Schwab and DMI. They sought to disrupt and damage Schwab's ability to conduct his personal business, and the business of DMI, by repeatedly and systematically stating in

print, for public dissemination, precisely identical and completely unfounded defamatory claims. For example, on August 14 and 15, 2018, Defendants posted precisely the same defamatory, malicious, baseless, and unsubstantiated allegations on jleaks, hefkervelt, the Herskowitz blog, and NJ News and Views. A purpose of these allegations was to target the financial and personal interests of Plaintiffs, and to draw attention and publicity to the websites of the Defendants.

63. Defendants engaged in multiple overt acts in furtherance of their conspiracy to defame Schwab and DMI, including but not limited to causing false statements to be made on jleaks, hefkervelt, the Herskowitz blog, NJ News and Views, and in public meetings.

64. By reason of the foregoing conduct, Defendants should be held liable for civil conspiracy.

65. As a result of Defendants' conduct, Plaintiffs' business and personal reputations have been damaged.

66. Defendants conduct was malicious and outrageous and warrants the imposition of punitive damages.

WHEREFORE, Plaintiffs demand judgment against Defendants for the following relief:

a. A permanent injunction requiring Defendants to remove the defamatory publications from jleaks, hefkervelt, the

Herskowitz blog and NJ News and Views and prohibiting Defendants from publishing false and defamatory statements that state, in words or substance, that Schwab is doing business with Menashe Miller accuses Plaintiffs of engaging in a criminal conspiracy with Menashe Miller.

b. A permanent injunction prohibiting Defendants from publishing false and defamatory statements that state, in words or substance, that Plaintiffs are engaged in an unlawful criminal conspiracy with Menashe Miller.

c. Punitive damages,

d. Compensatory damages,

e. Pre and post judgment interest,

f. Attorneys' fees and costs of suit,

g. Such other and further relief as the Court deems just, equitable and proper.

**COUNT FOUR**

**Aiding and Abetting**

67. Plaintiffs repeat and restate the allegations in the preceding paragraphs as if set forth in full herein.

68. Defendants committed unlawful acts when they caused defamatory statements to be published about Schwab and DMI.

69. Defendants knew that the defamatory statements would be used to try and prevent Lakewood Township from doing business with DMI.

70. Defendants knowingly and substantially participated in the wrongdoing and/or directed it.

71. By reason of the foregoing conduct, Defendants should be held liable for aiding and abetting each other's defamatory acts.

72. As a result of Defendants' conduct, Plaintiffs' business and personal reputations have been damaged.

73. Defendants' conduct was malicious and outrageous and warrants the imposition of punitive damages.

**JURY DEMAND**

Plaintiffs demand a trial by jury.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to the provisions of R. 4:25-4, Willard C. Shih, Esq. is hereby designated as trial counsel.

WILENTZ, GOLDMAN & SPITZER, P.A.

BY: 

WILLARD C. SHIH  
Attorneys for Plaintiffs  
Yechezkel "Charlie" Schwab and  
DataMap Intelligence, LLC

Dated: November 6, 2018

**CERTIFICATION PURSUANT TO RULE 4:5-1(b) (2)**

I certify that, to the best of my knowledge, information and belief, that the matter in controversy herein is not the subject of any other proceeding pending in any court or of any pending arbitration proceeding, that no other action or arbitration is contemplated, and that I am aware of no other party that should be joined in this action.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

WILENTZ, GOLDMAN & SPITZER, P.A.

BY: 

WILLARD C. SHIH  
Attorneys for Plaintiffs

Dated: November 6, 2018



**RULE 4:5-1(b)(3) CERTIFICATION**

I hereby certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

I certify that the foregoing is true. I am aware that if the foregoing is willfully false, I am subject to punishment.



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WILLARD C. SHIH  
Attorneys for Plaintiffs

Dated: November 6, 2018