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**SUPERIOR COURT OF N.J.
CUMBERLAND COUNTY**

MAR 20 2017

**REC'D & FILED
CIVIL CASE
MANAGEMENT OFFICE**

JANE JANNARONE	:	SUPERIOR COURT OF NEW JERSEY
	:	CUMBERLAND COUNTY
Plaintiff,	:	LAW DIVISION
vs.	:	
	:	DOCKET NO.: <i>Cum L 206-17</i>
JANET MENDEL (a/k/a JANET CLARKSON), SAMANTHA MAGPIONG, SCOTT MORSE, HEATHER MCGARVEY, CHRISTINE MAMAS, TIM MCGARVEY, CHRISTINE GIBERSON (a/k/a CHRISTINE GREEN), BARBARA EHRLMANN, STORMI HILL, MARTIN O'CONNOR, KATE SLAUGHTER CONLOW, MATTHEW ORLANDINI, DREW LEVINSON and ADELAIDE BEATRICE NAPHYS,	:	Civil Action
	:	COMPLAINT
Defendant(s).	:	<i>609- Defamation</i>

The Plaintiff, JANE JANNARONE by and through her undersigned counsel by way of Complaint against Defendants, says:

PARTIES

1. Plaintiff resides at 2633 OK Lane, Vineland, New Jersey 08361.
2. Plaintiff serves as the Cumberland County representative for the Pinelands Commission.
3. Additionally, Plaintiff is a realtor by trade with Collini Real Estate located at 258 N. Main Road, Vineland, New Jersey.
4. Defendant Janet Mendel resides at 6 Eydon Court, Medford, New Jersey 08055.

5. Defendant Samantha Magpiong resides at 317 Pleasant Drive, Cherry Hill, New Jersey 08033.
6. Defendant Scott Morse resides at 510 Oaklawn Avenue, Oaklyn, New Jersey 08107.
7. Defendant Heather McGarvey resides at 4 Sandstone Court, Shamong, New Jersey 08088.
8. Defendant Christine Mamas resides at 188 Clifton Avenue, #B, West Berlin, New Jersey 08091.
9. Defendant Tim McGarvey resides at 4 Sandstone Court, Shamong, New Jersey 08088.
10. Defendant Christine Giberson resides at 45 N. Delaware Avenue, Yardley, PA 19067.
11. Defendant Barbara Ehrmann resides at 321 Juniper Avenue, Somerdale, New Jersey 08083.
12. Defendant Stormi Hill resides at 115 Oakland Avenue, Atlantic Highlands, New, Jersey, 07716.
13. Defendant Martin O'Conner resides at 213 Coolidge Avenue, Beverly, New Jersey 08010.
14. Defendant Kate Slaughter Conlow resides at 11 Robinson Road, Medford, New Jersey 08055.
15. Defendant Matthew Orlandini resides at 3019 Candlewood Drive, Vineland, New Jersey 08361.

16. Defendant Drew Levinson resides at 565 River Terrace, Toms River, New Jersey 08755.

17. Defendant Adelaide Beatrice Naphys resides at 253 Winding Way Road, Stratford, New Jersey 08084-1819.

JURISDICTION & VENUE

18. This Court has jurisdiction pursuant to R. 4:4-4 because all parties either reside or conduct business in the State of New Jersey.

19. Venue is proper because Plaintiff's reputation as public figure, which is affected by the claims in this case is relevant to this county as she serves as Cumberland County representative for the Pinelands Commission.

20. Venue is proper because Plaintiff is a realtor who conducts business in Cumberland County.

21. Venue is proper pursuant to R. 4:3-2 because the Plaintiff's resides and does business in _____ County, New Jersey, and, moreover, the actions giving rise to this Complaint would affect Defendant business which is based in _____ County, New Jersey.

COUNT ONE

DEFAMATION (as to Janet Mendel)

22. On or about February 24, 2016, Defendant Janet Mendel ("Defendant Mendel") published a false and defamatory public review about the Plaintiff on a social media site.

23. Defendant Janet Mendel's public review posted on social media included the following false and defamatory statement about the Plaintiff, "*While serving as Cumberland County Commissioner, Ms. Jannarone was busy on her cell phone while the public was*

expressing their concerns about the proposed pipeline through the Pinelands. I would not trust her to listen to your concerns."

24. The false and defamatory statements made by Defendant Mendel concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

25. The statements made by Defendant Mendel clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as a County Commission and Realtor, and are thus defamatory per se under New Jersey law.

26. As a direct and proximate result of Defendant Mendel's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Mendel's public statements about her.

27. As a direct and proximate result of Defendant Mendel's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

28. As a direct and proximate result of Defendant Mendel's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

29. As a direct and proximate result of Defendant Mendel's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Mendel for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT TWO

DEFAMATION *(as to Samantha Magpiong)*

On or about February 24, 2016, Defendant Samantha Magpiong ("Defendant Magpiong") published a false and defamatory public review about the Plaintiff on a social media site.

30. Defendant Magpiong's public review posted on social media included the following false and defamatory statement about the Plaintiff, *"Thanks for selling out our pipelines! Think twice about using this business. You voted with your \$\$ people!"*

31. The false and defamatory statements made by Defendant Magpiong concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

32. The statements made by Defendant Magpiong clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as the Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

33. As a direct and proximate result of Defendant Magpiong's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Magpiong's public statements about her.

34. As a direct and proximate result of Defendant Magpiong's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

35. As a direct and proximate result of Defendant Magpiong's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

36. As a direct and proximate result of Defendant Magpiong's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Magpiong for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT THREE

DEFAMATION (as to Scott Morse)

On or about February 24, 2016, Defendant Scott Morse ("Defendant Morse") published a false and defamatory public review about the Plaintiff on a social media site.

37. Defendant Morse's public review posted on social media included the following false and defamatory statement about the Plaintiff, *"In my interaction with Jane, I found her to be very rude and unprofessional"*

38. The false and defamatory statements made by Defendant Morse concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

39. The statements made by Defendant Morse clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

40. As a direct and proximate result of Defendant Morse conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Morse 's public statements about her.

41. As a direct and proximate result of Defendant Morse's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

42. As a direct and proximate result of Defendant Morse's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

43. As a direct and proximate result of Defendant Morse's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Morse for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT FOUR

DEFAMATION (as to Heather McGarvey)

On or about February 24, 2016, Defendant Heather McGarvey ("Defendant McGarvey") published a false and defamatory public review about the Plaintiff on a social media site.

44. Defendant McGarvey's public review posted on social media included the following false and defamatory statement about the Plaintiff, "*Terrible company run by a horrible person, wish I could give 0 stars.*"

45. The false and defamatory statements made by Defendant McGarvey concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

46. The statements made by Defendant McGarvey clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as Cumberland County representative on the Pinelands Commission and Realtor, and are thus defamatory per se under New Jersey law.

47. As a direct and proximate result of Defendant McGarvey's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant McGarvey's public statements about her.

48. As a direct and proximate result of Defendant McGarvey's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

49. As a direct and proximate result of Defendant McGarvey's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

50. As a direct and proximate result of Defendant McGarvey's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant McGarvey for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT FIVE
DEFAMATION
(as to Christine Mamas)

On or about February 24, 2016, Defendant Christine Mamas ("Defendant Mamas") published a false and defamatory public review about the Plaintiff on a social media site.

51. Defendant Mamas' public review posted on social media included the following false and defamatory statement about the Plaintiff, *"Would never use her business or recommend her. She is a shill for the gas company and Chris Christie. She sold out our Pinelands to the highest bidder and should be ashamed of herself."*

52. The false and defamatory statements made by Defendant Mamas concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

53. The statements made by Defendant Mamas clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

54. As a direct and proximate result of Defendant Mamas' conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Mamas' public statements about her.

55. As a direct and proximate result of Defendant Mamas' conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

56. As a direct and proximate result of Defendant Mamas' conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

57. As a direct and proximate result of Defendant Mamas' conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Mamas' for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT SIX

DEFAMATION *(as to Tim McGarvey)*

On or about February 24, 2016, Defendant Tim McGarvey ("Defendant Tim McGarvey") published a false and defamatory public review about the Plaintiff on a social media site.

58. Defendant Tim McGarvey's public review posted on social media included the following false and defamatory statement about the Plaintiff, *"Makes terrible decisions and doesn't care about your future. For the right price though she can pretend. Thanks for your poor decision in voting yes for the pipeline!"*

59. The false and defamatory statements made by Defendant Tim McGarvey concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

60. The statements made by Defendant Tim McGarvey clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

61. As a direct and proximate result of Defendant Tim McGarvey's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Tim McGarvey's public statements about her.

62. As a direct and proximate result of Defendant Tim McGarvey's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

63. As a direct and proximate result of Defendant Tim McGarvey's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

64. As a direct and proximate result of Defendant Tim McGarvey's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Tim McGarvey for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT SEVEN

DEFAMATION *(as to Christine Giberson)*

On or about February 24, 2016, Defendant Christine Giberson ("Defendant Giberson") published a false and defamatory public review about the Plaintiff on a social media site.

65. Defendant Giberson's public review posted on social media included the following false and defamatory statement about the Plaintiff, "*Shame on you. You sold our pinelands to the big gas companys!*"

66. The false and defamatory statements made by Defendant Giberson concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

67. The statements made by Defendant Giberson clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

68. As a direct and proximate result of Defendant Giberson's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Giberson's public statements about her.

69. As a direct and proximate result of Defendant Giberson's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

70. As a direct and proximate result of Defendant Giberson's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

71. As a direct and proximate result of Defendant Giberson's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Giberson for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT EIGHT

DEFAMATION (as to Barbara Ehrmann)

On or about February 24, 2016, Defendant Barbara Ehrmann ("Defendant Ehrmann") published a false and defamatory public review about the Plaintiff on a social media site.

72. Defendant Ehrmann's public review posted on social media included the following false and defamatory statement about the Plaintiff, "*Would never use this business never a pipeline in our pines*".

73. The false and defamatory statements made by Defendant Ehrmann concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

74. The statements made by Defendant Ehrmann clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

75. a direct and proximate result of Defendant Ehrmann's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Ehrmann's public statements about her.

76. As a direct and proximate result of Defendant Ehrmann's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

77. As a direct and proximate result of Defendant Ehrmann's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

78. As a direct and proximate result of Defendant Ehrmann's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Ehrmann for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT NINE

**DEFAMATION
(as to Stormi Hill)**

On or about February 24, 2016, Defendant Stormi Hill ("Defendant Hill") published a false and defamatory public review about the Plaintiff on a social media site.

79. Defendant Hill's public review posted on social media included the following false and defamatory statement about the Plaintiff, "*Terrible person! Coward. Sell out. Stay far away! Shame on you*".

80. The false and defamatory statements made by Defendant Hill concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

81. The statements made by Defendant Hill clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as a Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

82. As a direct and proximate result of Defendant Hill's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Hill's public statements about her.

83. As a direct and proximate result of Defendant Hill's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

84. As a direct and proximate result of Defendant Hill's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

85. As a direct and proximate result of Defendant Hill's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Hill for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT TEN

DEFAMATION (as to Martin O' Connor)

On or about February 24, 2016, Defendant Martin O'Connor ("Defendant O'Conner") published a false and defamatory public review about the Plaintiff on a social media site.

86. Defendant O'Conner's public review posted on social media included the following false and defamatory statement about the Plaintiff, "*Wish I could give 0 stars. No integrity. Sellout. Rude. Disrespectful.*"

87. The false and defamatory statements made by Defendant O'Connor concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

88. The statements made by Defendant O'Connor clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

89. As a direct and proximate result of Defendant O'Connor's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Hill's public statements about her.

90. As a direct and proximate result of Defendant O'Connor's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

91. As a direct and proximate result of Defendant O'Connor's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

92. As a direct and proximate result of Defendant O'Connor's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant O'Connor for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT ELEVEN
DEFAMATION
(as to Kate Slaughter Conlow)

On or about February 24, 2016, Defendant Kate Slaughter Conlow ("Defendant Conlow") published a false and defamatory public review about the Plaintiff on a social media site.

93. Defendant Conlow's public review posted on social media included the following false and defamatory statement about the Plaintiff, *"Please allow me to introduce Jane Jannarone. Shes a realtor of wealth and taste, been around for a long long year, stole the pinelands soul and faith. She was round when Jesus Christ had his moment of doubt and pain, made damn sure to pilate, washed his hands and sealed his fate. Jane is pleased to meet you, hope you guess her true name, but what puzzling you is the nature of her game."*

94. The false and defamatory statements made by Defendant Conlow concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

95. The statements made by Defendant Conlow clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

96. As a direct and proximate result of Defendant Conlow's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Conlow's public statements about her.

97. As a direct and proximate result of Defendant Conlow's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

98. As a direct and proximate result of Defendant Conlow's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

99. As a direct and proximate result of Defendant Conlow's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Conlow for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT TWELVE
DEFAMATION
(as to Matthew Orlandini)

On or about February 24, 2016, Defendant Matthew Orlandini ("Defendant Orlandini") published a false and defamatory public review about the Plaintiff on a social media site.

100. Defendant Orlandini's public review posted on social media included the following false and defamatory statement about the Plaintiff, *"If you're looking for somebody to specifically sellout against your interest and fuck you over, this greedy cunt is surely the person to call."*

101. The false and defamatory statements made by Defendant Orlandini concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

102. The statements made by Defendant Orlandini clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional

positions as Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

103. As a direct and proximate result of Defendant Orlandini's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Orlandini's public statements about her.

104. As a direct and proximate result of Defendant Orlandini's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

105. As a direct and proximate result of Defendant Orlandini's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

106. As a direct and proximate result of Defendant Orlandini's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Orlandini for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT THIRTEEN
DEFAMATION
(as to Drew Levinson)

On or about February 24, 2016, Defendant Drew Levinson ("Defendant Levinson") published a false and defamatory public review about the Plaintiff on a social media site.

107. Defendant Levinson's public review posted on social media included the following false and defamatory statement about the Plaintiff, "*A disgrace to the Pine Lands. Cares about nothing more than the mighty dollar.*"

108. The false and defamatory statements made by Defendant Levinson concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

109. The statements made by Defendant Levinson clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

110. As a direct and proximate result of Defendant Levinson's conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Levinson's public statements about her.

111. As a direct and proximate result of Defendant Levinson's conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

112. As a direct and proximate result of Defendant Levinson's conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

113. As a direct and proximate result of Defendant Levinson's conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Levinson for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT FOURTEEN
DEFAMATION
(as to Adelaide Beatrice Naphys)

On or about February 24, 2016, Defendant Adelaide Beatrice Naphys ("Defendant Naphys") published a false and defamatory public review about the Plaintiff on a social media site.

114. Defendant Naphys' public review posted on social media included the following false and defamatory statement about the Plaintiff, *"I think Jane is a piece of ?!!!! How dare you vote yes to a pipeline!"*

115. The false and defamatory statements made by Defendant Naphys concerning the personal, professional and business reputation and character of Plaintiff were made maliciously and with the intent to destroy Plaintiff's professional reputation and career.

116. The statements made by Defendant Naphys clearly denigrated Plaintiff's reputation and accused her of engaging in conduct and have traits incompatible with her professional positions as Cumberland County representative on the Pinelands Commission and a Realtor, and are thus defamatory per se under New Jersey law.

117. As a direct and proximate result of Defendant Naphys' conduct, Plaintiff has been impaired in her ability to earn a living as a Realtor, losing the trust of the public due to Defendant Naphys' public statements about her.

118. As a direct and proximate result of Defendant Naphys' conduct, Plaintiff has sustained and will continue to sustain a loss of income in amounts that will be established at trial.

119. As a direct and proximate result of Defendant Naphys' conduct, Plaintiff has suffered and will continue to suffer extreme mental anguish and distress.

120. As a direct and proximate result of Defendant Naphys' conduct, Plaintiff's reputation has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendant Naphys for compensatory and punitive damages, together with counsel fees, costs of suit, and any other relief the Court deems proper.

COUNT FIFTEEN
TORTUOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE
(as to all Defendants)

121. Plaintiff repeats and realleges the allegations of previous Counts as if same were set forth at length herein.

122. The published comments made by Defendants on social media of the false and malicious statements about Plaintiff set for in the previous Counts interfered with the prospective economic advantage of the Plaintiff by inducing prospective clients not to engage plaintiff as their real estate agent.

123. The published comments made by Defendants of the false and malicious statements about Plaintiff set for in the previous Counts interfered with the prospective economic advantage of the Plaintiff by inducing residents not to trust plaintiff as their Cumberland County representative on the Pinelands Commission.

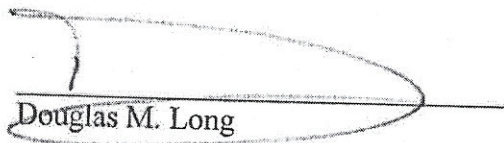
124. As a direct and proximate result of Defendants' malicious inducement to potential clients of the Plaintiff not to engage Plaintiff as their realtor, Plaintiff suffered damages in amounts that will be established at trial.

125. As a direct and proximate result of Defendants' malicious inducement of Cumberland County residents not to trust Plaintiff as their Cumberland County representative on the Pinelands Commission, Plaintiff suffered damages in amounts that will be established at trial.

WHEREFORE, Plaintiff requests judgment against Defendants' for compensatory and punitive damages, together with counsel fees, costs of suit, and other relieve the Court may deem appropriate.

LONG, MARMERO & ASSOCIATES, LLP

Dated: 3/17/17

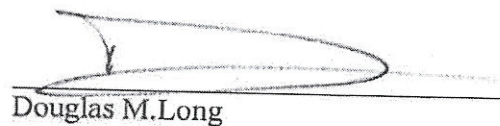

Douglas M. Long

CERTIFICATION PURSUANT TO R. 4:5-1(b)(2)

I hereby certify to the best of my information, knowledge, and belief the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding, and that no other action or arbitration proceeding is contemplated.

LONG, MARMERO & ASSOCIATES, LLP

Dated: 3/17/17


Douglas M. Long

TRIAL COUNSEL DESIGNATION PURSUANT TO R. 4:5-1(c)

Douglas M. Long, Esquire, is hereby designated as trial counsel for Plaintiff in the above matter.

LONG, MARMERO & ASSOCIATES, LLP

Dated: 3/17/17



Douglas M. Long

JURY DEMAND PURSUANT TO R. 1:8-2(B) AND 4:35-1(A)

Plaintiff hereby demands trial by a jury on all of the triable issues of this Complaint, pursuant to New Jersey Court Rules 1:8-2(b) and 4:35-1(a).

LONG, MARMERO & ASSOCIATES, LLP

Dated: 3/17/17


Douglas M. Long