

opra@totopra.com

From: Adam Myszka <amyszka@teanecknj.gov>
Sent: Monday, November 8, 2021 4:56 PM
To: Sasha Hofman
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:34 2023] Re: 519 Cedar Lane

We approved your zoning permit today, you'll be getting a call once its processed.

Adam Myszka
Assistant Zoning Officer
Township of Teaneck
818 Teaneck Road
Teaneck, NJ 07666
201-837-1600 Ext.1104
201-837-4802 Fax

From: Sasha Hofman <sashah63@yahoo.com>
To: Rosiland McLean <rmclean@teanecknj.gov>, <SASHAH63@YAHOO.COM>, Dan Melfi <dmelfi@teanecknj.gov>, Adam Myszka <amyszka@teanecknj.gov>
Cc: Mark Bocchino <mbocchino@teanecknj.gov>
Sent: 11/4/2021 7:59 PM
Subject: Re: 519 Cedar Lane

Please be advised that I represent Alexandra Hofman in connection with the above-referenced matter. Attached please find a copy of the Denial of Application received by my client from your office, which indicates that the file is incomplete because your office is waiting on attorney input on use viability in the MX-1 Zone. I have thoroughly reviewed the Teaneck zoning ordinance and have concluded that Section 33-24(q) expressly permits my client's pet store because it constitutes the "retail sale of goods and services". In addition, the ordinance expressly states that the MX Zoning District **is intended to encourage retail sales and services**. Moreover, pet stores are not prohibited under any section of the ordinance, including but not limited to Section 33-24(q) or Section 33-26.

Since (i) Section 33-24(q) expressly permits the use for which my client intends to operate her business and (ii) such use is not prohibited by any other section of the zoning ordinance, my client's application should be granted. Please let me know if you require any additional information or would like to discuss. Thanks.
View more

[Sent from Yahoo Mail for iPad](#)

On Thursday, November 4, 2021, 10:30 AM, Rosiland McLean <rmclean@teanecknj.gov> wrote:

Sasha:

Good morning.

You have to speak to Dan Melfi, who will be in on Tuesday, his extension is 1103.

Rosiland V. McLean

Technical Assistant/Land Use

Township of Teaneck Board Of Adjustment & Planning Board

818 Teaneck Road

Teaneck, NJ 07666 201 837-1600 x1110

201 837-4802 - Fax

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From: Bride Vaughn <bvaughn@teanecknj.gov>
Sent: Wednesday, October 20, 2021 1:46 PM
To: SASHAH63@YAHOO.COM
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:47 2023] 510 CEDARF LANE
Attachments: 20211020134340386.pdf

As discussed.

Bride Vaughn
Technical Assistant
Teaneck Building Department
818 Teaneck Road
Teaneck, NJ 07666
(201) 837-1600 x 1112
Email: bvaughn@teanecknj.gov

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519 Cedar Ln. NJ Puppy Store.

From: Dan Melfi <dmelfi@teanecknj.gov>

To: sashah63@gmail.com

Cc: Gina Miranda Diaz <gdiaz@teanecknj.gov>, Adam Myszka <amyszka@teanecknj.gov>

Date: 10/19/2021 2:56 PM

Afternoon. I have reviewed your application for your NJ Puppy Store. Before any decision is made can you please send me a detailed letter on the operation of the store, hours of operation, and off hours emergency procedures.. Thank you.

Dan Melfi / Zoning Official

From: [Dan Melfi](#)

Sent: Monday, March 20, 2023 2:28:04 PM

To: sashah63@yahoo.com

Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:36 2023] Re: 519 Cedar Lane

Sensitivity: Normal

I will be out of the office from Tuesday November 2nd returning November 9th. Please contact Adam Myszka at Amyszka@teanecknj.gov.

Dan Melfi

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From: Dan Melfi <dmelfi@teanecknj.gov>
Sent: Thursday, November 4, 2021 8:00 PM
To: sashah63@yahoo.com
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:36 2023] Re: 519 Cedar Lane

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Dan Melfi

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From: Mark Bocchino <mbocchino@teanecknj.gov>
Sent: Tuesday, November 30, 2021 12:31 PM
To: Sasha Hofman
Cc: Rosiland McLean; Dan Melfi; Adam Myszka
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:33 2023] Re: 519 Cedar Lane

Greetings,

As per the Permit Application for a
'Live Pet Store- Puppies Only', see
Township Code Chapter 6, Article IX
which states the following:

Sec. 6-68Restrictions on the sale of dogs and cats.

No pet store shall sell, deliver, offer for sale, barter, auction, give away or otherwise transfer or dispose of cats or dogs. Nothing in this section shall prohibit stores from collaborating with animal care facilities or animal rescue organizations to offer space for such entities to showcase adoptable dogs and cats.

Did you Know you can access permit information through the SDL Portal. Just follow the link

<https://www.sdlportal.com/towns/nj/bergen/teanecktwp>

You can create an account and file permit applications, schedule inspections and search for permit histories and other property information.

Stay Safe

Mark Bocchino Department Head/Construction Official/Plumbing Subcode Official Township of Teaneck Building
Department
818 Teaneck Road Teaneck, NJ 07666
Tel. 201-837-1600 Ext. 1101 Fax. 201-837-4802

From: Sasha Hofman <sashah63@yahoo.com>
To: Rosiland McLean <rmclean@teanecknj.gov>, <SASHAH63@YAHOO.COM>, Dan Melfi <dmelfi@teanecknj.gov>, Adam Myszka <amyszka@teanecknj.gov>
Cc: Mark Bocchino <mbocchino@teanecknj.gov>
Sent: 11/4/2021 7:59 PM
Subject: Re: 519 Cedar Lane

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addition, the ordinance expressly states that the MX Zoning District **is intended to encourage retail sales and services**. Moreover, pet stores are not prohibited under any section of the ordinance, including but not limited to Section 33-24(q) or Section 33-26.

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View more

[Sent from Yahoo Mail for iPad](#)

On Thursday, November 4, 2021, 10:30 AM, Rosiland McLean <rmclean@teanecknj.gov> wrote:

Sasha:

Good morning.

You have to speak to Dan Melfi, who will be in on Tuesday, his extension is 1103.

Rosiland V. McLean

Technical Assistant/Land Use

Township of Teaneck Board Of Adjustment & Planning Board

818 Teaneck Road

Teaneck, NJ 07666 201 837-1600 x1110

201 837-4802 - Fax

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From: Mark Bocchino <mbocchino@teanecknj.gov>
Sent: Thursday, December 2, 2021 12:05 PM
To: Sasha Hofman
Cc: Rosiland McLean; Dan Melfi; Adam Myszka; Sue Walters; Cathy Puglisi; Bride Vaughn
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:32 2023] Re: 519 Cedar Lane

See latest communication from Health;

Greetings,

After further reading of the Zoning Application and not seeing any reference to the Sale' of any animals, the Live Pet Store needs no review from the Health Department; with the understanding, if there is evidence of puppies, etc. being 'SOLD', then, Chapter 6, Article IX, Section: 6-68 will be enforced.

Our Technical Assistants will calculate the permit fees for the Construction permit and contact you or the contractor.

Did you Know you can access permit information through the SDL Portal. Just follow the link
<https://www.sdlportal.com/towns/nj/bergen/teanecktwp>

You can create an account and file permit applications, schedule inspections and search for permit histories and other property information.

Stay Safe

Mark Bocchino Department Head/Construction Official/Plumbing Subcode Official Township of Teaneck Building Department
818 Teaneck Road Teaneck, NJ 07666
Tel. 201-837-1600 Ext. 1101 Fax. 201-837-4802

From: Sasha Hofman <sashah63@yahoo.com>
To: Rosiland McLean <rmclean@teanecknj.gov>, <SASHAH63@YAHOO.COM>, Dan Melfi <dmelfi@teanecknj.gov>, Adam Myszka <amyszka@teanecknj.gov>
Cc: Mark Bocchino <mbocchino@teanecknj.gov>
Sent: 11/4/2021 7:59 PM
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Rosiland V. McLean

Technical Assistant/Land Use

Township of Teaneck Board Of Adjustment & Planning Board

818 Teaneck Road

Teaneck, NJ 07666 201 837-1600 x1110

201 837-4802 - Fax

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opra@totopra.com

From: Rosiland McLean <rmclean@teanecknj.gov>
Sent: Thursday, November 4, 2021 10:30 AM
To: SASHAH63@YAHOO.COM; Dan Melfi; Adam Myszka
Cc: Mark Bocchino
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:42 2023] 519 Cedar Lane

Sasha:

Good morning.

You have to speak to Dan Melfi, who will be in on Tuesday, his extension is 1103.

Rosiland V. McLean

Technical Assistant/Land Use

Township of Teaneck Board Of Adjustment & Planning Board

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Teaneck, NJ 07666 201 837-1600 x1110

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opra@totopra.com

From: Ryan Milun <ryan.milun@milunlaw.com>
Sent: Monday, September 12, 2022 3:34 PM
To: steven lozner; William F. Rupp
Cc: Dean Kazinci; John L. Shahdanian; Sasha Hofman
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:24 2023] RE: Wayne Puppies - Notice of Claim

William,

I am just following up on the email below and the Notice of Claim that was sent a little over a month ago. Please let us know whether the township has considered the claim and when we can expect a decision.

Of course, if you have any questions, please feel free to reach out to me.

Thanks.

Ryan Milun
THE MILUN LAW FIRM, LLC
Cranford Business Park
20 Commerce Drive, Suite 135
Cranford, New Jersey 07016
Ryan.milun@milunlaw.com
Phone: 862-702-5010 ext. 1001
Direct Line: 862-702-5011
<https://milunlaw.com/>

Confidentiality Notice:

This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 U.S.C. Section 2510, and its disclosure is strictly limited to the recipient intended by the sender of this message. This transmission, and any attachments, may contain confidential attorney-client privileged information and attorney work product. If you are not the intended recipient, any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. Please contact us immediately by return e-mail or at 732.912.2100, and destroy the original transmission and its attachments without reading or saving in any manner.

From: steven lozner <lozner.merchant@gmail.com>
Sent: Wednesday, August 10, 2022 9:02 AM
To: William F. Rupp <wrupp@trenkisabel.law>
Cc: Dean Kazinci <dkazinci@teanecknj.gov>; John L. Shahdanian <jshahdanian@trenkisabel.law>; Sasha Hofman <sashah63@yahoo.com>; Ryan Milun <ryan.milun@milunlaw.com>
Subject: Wayne Puppies - Notice of Claim

Dear Mr. Rupp:

Attached please find a copy of the Notice of Claim that is being sent to your client on behalf of Wayne Puppies. Please note that we are still open to discussing Wayne Puppies' business operations in a manner that does not violate the Code.

Thanks.

Steven Lozner, Esq.
917-620-5586

From: steven lozner <lozner.merchant@gmail.com>
Date: Tuesday, July 26, 2022 at 5:54 PM
To: "William F. Rupp" <wrupp@trenkisabel.law>
Cc: Dean Kazinci <dkazinci@teanecknj.gov>, "John L. Shahdanian" <jshahdanian@trenkisabel.law>, Sasha Hofman <sashah63@yahoo.com>
Subject: Re: Wayne Puppies

Dear Mr. Rupp:

Attached please find a second follow-up letter on behalf of Wayne Puppies. Please respond no later than July 29, 2022. Thanks.

Steven Lozner, Esq.
917-620-5586

From: "William F. Rupp" <wrupp@trenkisabel.law>
Date: Monday, July 25, 2022 at 4:31 PM
To: steven lozner <lozner.merchant@gmail.com>
Cc: Dean Kazinci <dkazinci@teanecknj.gov>, "John L. Shahdanian" <jshahdanian@trenkisabel.law>
Subject: RE: Wayne Puppies

Dear Mr. Lozner:

In reply to your letters of July 18, 2022, and July 25, 2022, please see the attached letter on behalf of the Township of Teaneck.

William Rupp

TISS **TRENK ISABEL**
ATTORNEYS AT LAW **SIDDIQI &**
SHAHDANIAN P.C.

William F. Rupp
Partner
290 W. Mt. Pleasant Avenue | Suite 2350 | Livingston, NJ 07039
Office: (973) 533-1000, ext. 1007
Direct: (973) 327-0243
Mobile: (201) 394-0312
E-Mail: wrupp@trenkisabel.law

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From: steven lozner <lozner.merchant@gmail.com>
Sent: Monday, July 25, 2022 11:53 AM
To: William F. Rupp <wrupp@trenkisabel.law>
Cc: Sasha Hofman <sashah63@yahoo.com>
Subject: Re: Wayne Puppies

Dear Mr. Rupp:

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Steven Lozner, Esq.
917-620-5586

From: steven lozner <lozner.merchant@gmail.com>

Date: Saturday, July 16, 2022 at 2:54 PM

To: <wrupp@trenkisabel.law>

Cc: Sasha Hofman <sashah63@yahoo.com>

Subject: Wayne Puppies

Dear Mr. Rupp:

Attached please find a letter on behalf of Wayne Puppies responding to your letter dated July 11, 2022. Thanks.

Steven Lozner, Esq.
917-620-5586

opra@totopra.com

From: Sasha Hofman <sashah63@yahoo.com>
Sent: Wednesday, October 20, 2021 4:53 PM
To: Bride Vaughn
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:46 2023] Re: 510 CEDARF LANE

On Wednesday, October 20, 2021, 01:46:30 PM EDT, Bride Vaughn <bvaughn@teanecknj.gov> wrote:

As discussed.

Bride Vaughn
Technical Assistant
Teaneck Building Department
818 Teaneck Road
Teaneck, NJ 07666
(201) 837-1600 x 1112
Email: bvaughn@teanecknj.gov

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From: Sasha Hofman <sashah63@yahoo.com>
Sent: Thursday, November 4, 2021 7:59 PM
To: Rosiland McLean; SASHAH63@YAHOO.COM; Dan Melfi; Adam Myszka
Cc: Mark Bocchino
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:41 2023] Re: 519 Cedar Lane

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Technical Assistant/Land Use

Township of Teaneck Board Of Adjustment & Planning Board

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Cc: Mark Bocchino
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:39 2023] Re: 519 Cedar Lane

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Technical Assistant/Land Use

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To: Rosiland McLean; SASHAH63@YAHOO.COM; Dan Melfi; Adam Myszka
Cc: Mark Bocchino
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:38 2023] Re: 519 Cedar Lane

Please be advised that I represent Alexandra Hofman in connection with the above-referenced matter. Attached please find a copy of the Denial of Application received by my client from your office, which indicates that the file is incomplete because your office is waiting on attorney input on use viability in the MX-1 Zone. I have thoroughly reviewed the Teaneck zoning ordinance and have concluded that Section 33-24(q) expressly permits my client's pet store because it constitutes the "retail sale of goods and services". In addition, the ordinance expressly states that the MX Zoning District **is intended to encourage retail sales and services**. Moreover, pet stores are not prohibited under any section of the ordinance, including but not limited to Section 33-24(q) or Section 33-26.

Since (i) Section 33-24(q) expressly permits the use for which my client intends to operate her business and (ii) such use is not prohibited by any other section of the zoning ordinance, my client's application should be granted. Please let me know if you require any additional information or would like to discuss. Thanks.
View more

[Sent from Yahoo Mail for iPad](#)

On Thursday, November 4, 2021, 10:30 AM, Rosiland McLean <rmclean@teanecknj.gov> wrote:

Sasha:

Good morning.

You have to speak to Dan Melfi, who will be in on Tuesday, his extension is 1103.

Rosiland V. McLean

Technical Assistant/Land Use

Township of Teaneck Board Of Adjustment & Planning Board

818 Teaneck Road

Teaneck, NJ 07666 201 837-1600 x1110

201 837-4802 - Fax

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From: Sasha Hofman <sashah63@yahoo.com>
Sent: Thursday, November 4, 2021 7:59 PM
To: Rosiland McLean; SASHAH63@YAHOO.COM; Dan Melfi; Adam Myszka
Cc: Mark Bocchino
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:37 2023] Re: 519 Cedar Lane

Please be advised that I represent Alexandra Hofman in connection with the above-referenced matter. Attached please find a copy of the Denial of Application received by my client from your office, which indicates that the file is incomplete because your office is waiting on attorney input on use viability in the MX-1 Zone. I have thoroughly reviewed the Teaneck zoning ordinance and have concluded that Section 33-24(q) expressly permits my client's pet store because it constitutes the "retail sale of goods and services". In addition, the ordinance expressly states that the MX Zoning District **is intended to encourage retail sales and services**. Moreover, pet stores are not prohibited under any section of the ordinance, including but not limited to Section 33-24(q) or Section 33-26.

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View more

[Sent from Yahoo Mail for iPad](#)

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Sasha:

Good morning.

You have to speak to Dan Melfi, who will be in on Tuesday, his extension is 1103.

Rosiland V. McLean

Technical Assistant/Land Use

Township of Teaneck Board Of Adjustment & Planning Board

818 Teaneck Road

Teaneck, NJ 07666 201 837-1600 x1110

201 837-4802 - Fax

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you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: Steven Lozner <lozner.merchant@gmail.com>
Sent: Wednesday, November 3, 2021 10:55 AM
To: bvaughn@teanecknj.gov; sashah63@yahoo.com
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:43 2023] FW: Denial of Application - Alexandra Hofman
Attachments: 20211103092745066.pdf

Mr. Myszka and Ms. Vaughn:

Please be advised that I represent Alexandra Hofman in connection with the above-referenced matter. Attached please find a copy of the Denial of Application received by my client from your office, which indicates that the file is incomplete because your office is waiting on attorney input on use viability in the MX-1 Zone. I have thoroughly reviewed the Teaneck zoning ordinance and have concluded that Section 33-24(q) expressly permits my client's pet store because it constitutes the "retail sale of goods and services". In addition, the ordinance expressly states that the MX Zoning District **is intended to encourage retail sales and services**. Moreover, pet stores are not prohibited under any section of the ordinance, including but not limited to Section 33-24(q) or Section 33-26.

Since (i) Section 33-24(q) expressly permits the use for which my client intends to operate her business and (ii) such use is not prohibited by any other section of the zoning ordinance, my client's application should be granted. Please let me know if you require any additional information or would like to discuss. Thanks.

Steven Lozner



Teaneck Township
ZONING OFFICER
818 TEANECK ROAD
TEANECK, NJ 07666
(201) 837-1600 FAX(201) 837-4802
DMELFI@TEANECKNJ.GOV

Application Date: 10/18/2021
Application Number: 20210887
Permit Number: _____
Project Number: _____

Fee: \$250

Denial of Application

Date: 10/27/2021

To: ALEXENDRA HOFMAN
16-10 ALDEN TERRACE
FAIR LAWN, NJ 07410

CC: APP TELE:(201) 951-0027
APP EMAIL:SASHAH63@YAHOO.COM

RE: 519 CEDAR LANE
BLOCK: 818 LOT: 12 QUAL: ZONE: MX-1

DEAR ALEXENDRA HOFMAN,
LIVE PET STORE - PUPPIES ONLY AS PER DOCUMENTS SUBMITTED THROUGH 10-20-2021.

INCOMPLETE:
Waiting on attorney input on use viability in MX-1 zone.

SUBMITTAL OF ANY NEW DOCUMENTS MAY REQUIRE ADDITIONAL VARIANCES OR WAIVERS

Sincerely,

ADAM MYSZKA, ASSISTANT ZONING OFFICER

opra@totopra.com

From: steven lozner <lozner.merchant@gmail.com>
Sent: Tuesday, July 26, 2022 5:55 PM
To: William F. Rupp
Cc: Dean Kazinci; John L. Shahdanian; Sasha Hofman
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:29 2023] Re: Wayne Puppies
Attachments: Scan2022-07-26_175036.pdf

Dear Mr. Rupp:

Attached please find a second follow-up letter on behalf of Wayne Puppies. Please respond no later than July 29, 2022. Thanks.

Steven Lozner, Esq.
917-620-5586

From: "William F. Rupp" <wrupp@trenkisabel.law>
Date: Monday, July 25, 2022 at 4:31 PM
To: steven lozner <lozner.merchant@gmail.com>
Cc: Dean Kazinci <dkazinci@teanecknj.gov>, "John L. Shahdanian" <jshahdanian@trenkisabel.law>
Subject: RE: Wayne Puppies

Dear Mr. Lozner:

In reply to your letters of July 18, 2022, and July 25, 2022, please see the attached letter on behalf of the Township of Teaneck.

William Rupp

TISS **TRENK ISABEL**
ATTORNEYS AT LAW **SIDDIQI & SHAHDANIAN P.C.**

William F. Rupp
Partner
290 W. Mt. Pleasant Avenue | Suite 2350 | Livingston, NJ 07039
Office: (973) 533-1000, ext. 1007
Direct: (973) 327-0243
Mobile: (201) 394-0312
E-Mail: wrupp@trenkisabel.law

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From: steven lozner <lozner.merchant@gmail.com>
Sent: Monday, July 25, 2022 11:53 AM
To: William F. Rupp <wrupp@trenkisabel.law>

Cc: Sasha Hofman <sashah63@yahoo.com>

Subject: Re: Wayne Puppies

Dear Mr. Rupp:

Attached please find a follow-up letter on behalf of Wayne Puppies. Please respond no later than July 29, 2022. Thanks.

Steven Lozner, Esq.

917-620-5586

From: steven lozner <lozner.merchant@gmail.com>

Date: Saturday, July 16, 2022 at 2:54 PM

To: <wrupp@trenkisabel.law>

Cc: Sasha Hofman <sashah63@yahoo.com>

Subject: Wayne Puppies

Dear Mr. Rupp:

Attached please find a letter on behalf of Wayne Puppies responding to your letter dated July 11, 2022. Thanks.

Steven Lozner, Esq.

917-620-5586

LAW OFFICE OF STEVEN W. LOZNER
ATTORNEY AT LAW

MEMBER OF NY BAR
MEMBER OF NJ BAR

18 BROWNSTONE WAY
UPPER SADDLE RIVER, NEW JERSEY 07458
TELEPHONE: (917) 620-5586

lozner.merchant@gmail.com

July 26, 2022

VIA REGULAR MAIL AND EMAIL TO WRUPP@TRENKISABEL.LAW

Trenk Isabel Siddiqi & Shahdanian P.C.
290 West Mount Pleasant Avenue
Building 3, Suite 2350
Livingston, NJ 07039

Attn: William F. Rupp, Esq.

Re: Wayne Puppies

Dear Mr. Rupp:

This letter is in response to your letter dated July 25, 2022. Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in my letter addressed to you dated July 18, 2022 or my letter addressed to you dated July 25, 2022, as the context so requires.

As a preliminary matter, your client's assertion that my client's Proposed Business Plan constitutes an "offer for sale" under the Teaneck Code is preposterous and is simply not supported by the clear text of the Teaneck Code. This strained interpretation of the Teaneck Code will be vehemently disputed in the event that this matter goes to litigation.

More importantly, it is clear by your letters that you have not yet been apprised of the material facts relating to this matter. During the Township of Teaneck's thorough and lengthy approval process relating to my client's Proposed Business Plan, my client and I had several extensive conversations with Curtis Caviness, Teaneck's Chief Registered Environmental Health Specialist and Health Department Township Manager. During those conversations, Mr. Caviness and I specifically discussed the language set forth in the Teaneck Code as it relates to my client's Proposed Business Plan (including but not limited to my client's intention to build cages to house live puppies in open view to the public at the Teaneck Location).

Mr. Caviness expressly represented to my client and I that, notwithstanding the prohibitions set forth in the Teaneck Code, the Township of Teaneck would not consider my client's intent to house live puppies in open view to the public at the Teaneck Location

to constitute a "sale, delivery, offer for sale, barter, auction, give away or other disposition of a dog" at the Teaneck Location within the meaning of Chapter 6, Article IX, Sections 6.6 and 6.68 of the Code of the Township of Teaneck, New Jersey, 1964 (as amended, the "Teaneck Code") or any related ordinances. Accordingly, Mr. Caviness assured us that the Township of Teaneck would not take any adverse action against my client under the Teaneck Code as long as my client adhered to its Proposed Business Plan. Further, in a subsequent conversation my client and I had with Mr. Caviness, he assured us that the Township of Teaneck had expressly approved our detailed description of my client's Proposed Business Plan (including my client's intention to build cages to house live puppies in open view to the public at the Teaneck Location), as evidenced by the construction permit granted by the Township of Teaneck to my client, which prominently states "LIVE PET STORE". For the avoidance of doubt, Mr. Caviness was also made aware that the permit granted by the Township of Teaneck for a "LIVE PET STORE" was not for the purpose of collaborating with any animal care facility or animal rescue organization.

Please be advised that we have recently been contacted by certain Teaneck town officials regarding a petition that was posted by Hillary Goldberg on Change.org and re-circulated via numerous social media platforms, a copy of which is attached hereto as Exhibit A. This petition seeks to prevent my client's business from opening based on false and defamatory accusations lodged by Ms. Goldberg on such petition. We are also aware that Ms. Goldberg has spearheaded an effort to enlist other Teaneck residents to sign her petition and to apply strong political pressure on the Township of Teaneck to shut my client's business down in an attempt to further her political aspirations. As you are aware, Ms. Goldberg recently ran as a political candidate for Teaneck Town Counsel and targeted certain elected Teaneck officials based on what she perceived to be widespread inaction on the part of certain currently elected Teaneck officials. Ms. Goldberg is therefore using my client's business as a platform to further her political career.

Since Teaneck town officials are aware of Ms. Goldberg's efforts to harm my client's business and to apply political pressure on such officials, it is quite obvious that the reason why these elected Teaneck officials are now attempting to revoke the Township of Teaneck's previously granted approval of my client's Proposed Business Plan is that they are bowing to extreme political pressure at the expense of my client and with reckless disregard for the interests of Teaneck business owners generally.

Based on the Township of Teaneck's sudden reversal of its previous express approval of my client's Proposed Business Plan, it appears that the Township of Teaneck has made numerous material and intentional and/or grossly negligent misrepresentations to my client. **You are hereby put on notice that my client has relied to its detriment on such material misrepresentations and has suffered substantial damages as a direct result.**

As previously mentioned, my client decided to move forward with construction at the Teaneck Location based on such material misrepresentations and has therefore incurred nearly \$100,000 in expenses and attorneys' fees in connection with the planned opening of the Teaneck Location. In addition, my client is bound by a 5-year lease at the Teaneck

Location, with total rent payments due in the amount of \$144,000 during the term of such lease.

Accordingly, unless the Township of Teaneck agrees no later than July 29, 2022 to either (i) reimburse my client in full for all expenses it has incurred to date in connection with the planned opening of the Teaneck Location or (ii) confirm that my client's Proposed Business Plan remains acceptable to the Township of Teaneck, my client intends to (x) seek an injunction to prevent the Township of Teaneck from issuing any summonses or prosecuting my client pending a final, non-appealable adjudication of this matter and (y) sue the Township of Teaneck in civil court for significant compensatory and punitive damages, as well as for all attorney's fees incurred in connection with this matter. It is anticipated that I will be asked to provide sworn testimony in connection therewith.

I trust your client will be guided accordingly.

Sincerely,



Steven W. Lozner, Esq.

cc: Wayne Puppies

EXHIBIT A

CHANGE.ORG PETITION

[Attached]



At 500 signatures, this petition is more likely to be featured in recommendations!

Keep Wayne's Puppies out of Teaneck!

240 have signed. Let's get to 500!



At 500 signatures, this petition is more likely to be featured in recommendations!



Hillary Goldberg signed this petition



Hillary Goldberg started this petition

Have you ever wondered where that cute dog in the pet store window came from? That tiny adorable puppy has had a rough life behind it. That poor dog came from a puppy mill.

Puppy mills are the industry that is essentially a puppy factory who sells their dogs in bulk to pet stores. These are also a significant number of breeders. Puppy mills jobs are to produce the cute, popular, "pure" bred dogs. Their main focus is their profit, not the dogs. They want to maximize profit and minimize spending.

In order to do this, the dogs are kept in small cages, poor nutrition, poor vetting. The mothers are bred until they no longer can, and are then either killed or if a rescue manager to save them, they will go to a rescue. The cages they are in are rarely cleaned, and leads to disease, sickness, growths on their body. When they are cleaned, the workers simply use a powerful hose to spray the cages clean, with the dogs inside the cage. Dogs have lost eyes due to the powerful water.

Dogs are emaciated, because their very little food portion is contaminated, and their water bowls are filled with algae. So these dogs are practically skin and bones, so how would they be in the shape to breed? Confusingly, puppy mills still pull off breeding millions of dogs at these fast rates. A female dog is used to breed until she can't anymore. Then instead of having that poor dog have a happy ever after, the puppy mills shoot those dogs because

they aren't able to breed, because otherwise they will be taking up space in their puppy mills.

The best way to stop this is to stop buying dogs from pet stores and online. There are millions of dogs available for adoption, of every breed and every age. The process is harder to adopt because rescues go through a vigorous vetting process to ensure that the adopting family is the best fit for the dogs, and the dog is the best fit for the adopting family.

In Teaneck, we have an ordinance that does not allow the sale of dogs or cats. However, as with any other unethical, immoral, or illegal practice, there are loopholes to be found. Currently, Wayne's puppies is set to open on Cedar Lane in Teaneck, NJ. The premise of this not for sale puppy store, is that it is essentially a showroom for dogs, and then you are sent to their Wayne store to purchase the dogs, where it is legal to do so. This unethical behavior must be stopped and Wayne's puppies is not welcome in Teaneck. Teaneck is not a place dogs are for sale.

We petition the Teaneck Township Council, the Health Department, the Zoning Board of Adjustment, the Zoning Sub-Committee to pass an ordinance that will not allow dogs to be sold in our stores, or used as a showroom for neighboring towns that do allow this inhumane practice. Do NOT let Wayne's Puppies to open in Teaneck!



Start a petition of your own

This petition starter stood up and took action. Will you do the same?

Updates

200 supporters

11 hours ago

Hillary Goldberg started this petition

21 hours ago

opra@totopra.com

From: steven lozner <lozner.merchant@gmail.com>
Sent: Wednesday, August 10, 2022 9:02 AM
To: William F. Rupp
Cc: Dean Kazinci; John L. Shahdanian; Sasha Hofman; ryan.milun@milunlaw.com
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:26 2023] Wayne Puppies - Notice of Claim
Attachments: Scan2022-08-10_085152.pdf

Dear Mr. Rupp:

Attached please find a copy of the Notice of Claim that is being sent to your client on behalf of Wayne Puppies. Please note that we are still open to discussing Wayne Puppies' business operations in a manner that does not violate the Code.

Thanks.

Steven Lozner, Esq.
917-620-5586

From: steven lozner <lozner.merchant@gmail.com>
Date: Tuesday, July 26, 2022 at 5:54 PM
To: "William F. Rupp" <wrupp@trenkisabel.law>
Cc: Dean Kazinci <dkazinci@teanecknj.gov>, "John L. Shahdanian" <jshahdanian@trenkisabel.law>, Sasha Hofman <sashah63@yahoo.com>
Subject: Re: Wayne Puppies

Dear Mr. Rupp:

Attached please find a second follow-up letter on behalf of Wayne Puppies. Please respond no later than July 29, 2022. Thanks.

Steven Lozner, Esq.
917-620-5586

From: "William F. Rupp" <wrupp@trenkisabel.law>
Date: Monday, July 25, 2022 at 4:31 PM
To: steven lozner <lozner.merchant@gmail.com>
Cc: Dean Kazinci <dkazinci@teanecknj.gov>, "John L. Shahdanian" <jshahdanian@trenkisabel.law>
Subject: RE: Wayne Puppies

Dear Mr. Lozner:

In reply to your letters of July 18, 2022, and July 25, 2022, please see the attached letter on behalf of the Township of Teaneck.

William Rupp

William F. Rupp

Partner

290 W. Mt. Pleasant Avenue | Suite 2350 | Livingston, NJ 07039

Office: (973) 533-1000, ext. 1007

Direct: (973) 327-0243

Mobile: (201) 394-0312

E-Mail: wrupp@trenkisabel.law

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From: steven lozner <lozner.merchant@gmail.com>

Sent: Monday, July 25, 2022 11:53 AM

To: William F. Rupp <wrupp@trenkisabel.law>

Cc: Sasha Hofman <sashah63@yahoo.com>

Subject: Re: Wayne Puppies

Dear Mr. Rupp:

Attached please find a follow-up letter on behalf of Wayne Puppies. Please respond no later than July 29, 2022. Thanks.

Steven Lozner, Esq.

917-620-5586

From: steven lozner <lozner.merchant@gmail.com>

Date: Saturday, July 16, 2022 at 2:54 PM

To: <wrupp@trenkisabel.law>

Cc: Sasha Hofman <sashah63@yahoo.com>

Subject: Wayne Puppies

Dear Mr. Rupp:

Attached please find a letter on behalf of Wayne Puppies responding to your letter dated July 11, 2022. Thanks.

Steven Lozner, Esq.

917-620-5586

TOWNSHIP OF TEANECK
NOTICE OF CLAIM [Pursuant to N.J.S.A. 59:8-6]

To: Municipal Clerk
Township of Teaneck
818 Teaneck Road
Teaneck, New Jersey 07666

1. IDENTIFICATION OF CLAIMANT:

NJ Puppy Stores t/a Wayne Puppies
c/o Alexandra Hofman
519 Cedar Lane,
Teaneck, New Jersey 07666

2. NOTICES TO OTHER THAN CLAIMANT:

Ryan Milun, Esq.
The Milun Law Firm, LLC
20 Commerce Drive, Suite 135
Cranford, New Jersey 07016
Ph: 862-702-5010 // Fax 862-206-4545
Ryan.milun@milunlaw.com

PLEASE SEND NOTICES TO ATTORNEY

3. DESCRIPTION OF ACCIDENT OR CLAIM:

3A. Date and Time: July 25, 2022

3B. Location or Place of Occurrence:

NJ Puppy Stores t/a Wayne Puppies, 519 Cedar Lane, Teaneck, New Jersey 07666

3C. Describe how the accident or occurrence happened. If a diagram will assist your explanation, please attach hereto.

On July 25, 2022, Wayne Puppies received a letter from the Township of Teaneck (a copy of which is attached) advising that the previously agreed-to business plan for Wayne Puppies' Teaneck location, including but not limited to the intention to build cages and house live puppies in open view to the public at the Teaneck location, was now being considered a violation of Section 6-68 of the Code of the Township of Teaneck. The referred to Code Section provides that "No pet store shall sell, deliver, offer for sale, barter, auction, give away or otherwise transfer or dispose of cats or dogs. Nothing in this section shall prohibit stores from collaborating with animal care facilities or animal rescue organizations to offer space for such entities to showcase adoptable dogs and cats."

The July 25, 2022 decision from the Township was a complete reversal of Teaneck's prior interpretations of the Code and was not based on any change of circumstances other than outside political pressure acting upon the current Township members. During the lengthy approval process for Wayne Puppies business plan, Wayne Puppies had several extensive conversations with Curtis Caviness, Teaneck's Chief Registered Environmental Health Specialist and Health Department Township Manager. During those conversations, the Teaneck Code was specifically discussed, and Mr. Caviness expressly represented to Wayne Puppies that the Township of Teaneck **would not** consider the housing of puppies in open view to the public at the Teaneck, New Jersey location to constitute a "sale, delivery, offer for sale, barter, auction, give away or other disposition of a dog" within the meaning of Chapter 6, Article IX, Sections 6.6 and 6.68 of the Code of the Township of Teaneck. Wayne Puppies was further assured that the Township of Teaneck **would not** take any adverse action against it, so long as Wayne Puppies adhered to the proposed business plan. Wayne Puppies was also assured by Mr. Caviness that the Township of Teaneck had expressly approved the detailed description of Wayne Puppies business plan (including the intention to build cages to house live puppies in open view to the public).

In reliance on the representations of Mr. Caviness and the assurances that the Township of Teaneck would not be taking adverse actions, so long as Wayne Puppies stuck to the proposed business plan, Wayne Puppies expended approximately \$120,000 building out the Teaneck location and also signed a lease for the premise that will cost upwards of \$144,000 over the course of the next five years.

The sudden revocation of the Township of Teaneck's approval of the business plan and its now taking the position that the approved business plan violates the Teaneck Code is completely unjustified, unwarranted, and has caused significant damage to Wayne Puppies. Indeed, the revocation of approval was improperly based not on an interpretation of the Code or any change in factual circumstances, but rather in response to political pressure applied by a Teaneck resident that happened to start a Change.org petition in a malicious effort to prevent Wayne Puppies from opening its Teaneck location. The Change.org petition was based on false and defamatory accusations lodged against Wayne Puppies, all of which are completely unfounded. The sudden reversal of the Township of Teaneck's previous position approving the Wayne Puppies business plan – based on political pressure as opposed to the information and the actual business plan of Wayne Puppies – demonstrates that the Township of Teaneck bowed to political pressure at the expense of Wayne Puppies and with reckless disregard for the interests of Teaneck business owners.

The representations made by Mr. Caviness that were relied upon by Wayne Puppies and more importantly the unjustified and improper reversal by the Township of Teaneck of the Wayne Puppies business plan fall under the Public Employee Immunity exceptions, under N.J.S.A 59:3-14 (among other applicable sections), which provides that "Nothing in this act shall exonerate a public employee from liability if it is established this his conduct was outside the scope of his employment or constituted a crime, actual fraud, actual malice or willful misconduct." Indeed, the letter from the Township attorney, dated July 11, 2022, specifically notes that "pet stores, kennels and shelters are required to be licensed by and

inspected by the local health department pursuant to N.J.S.A. 4:19-15.8 and the regulations adopted thereunder (N.J.A.C. 8:23-1.1 et seq.) The issuance of a Certificate of Occupancy is limited to compliance with the Uniform Construction Code and the zoning ordinance.” Given the limited scope of authority granted to the Health Department, it is curious that Mr. Caviness and/or other Township of Teaneck officials, would be making binding representations to Wayne Puppies about its ability to operate a business – knowing full well that Wayne Puppies would be relying on those representations to construct and conduct business in Teaneck – absent the express authority to do so.¹ Therefore, the Township and specifically, Mr. Caviness are not entitled to any deference or immunity under the New Jersey Tort Claims Act N.J.S.A. 59:1-1 et seq.

Finally, the Township of Teaneck is not entitled to any deference in its revocation of its approval of the business plan as it was not based on an interpretation of any statute or Code, but rather based on outside forces, including political pressure placed on the Township members; especially with an election upcoming this November. The revocation is therefore outside the scope of the Township of Teaneck’s duties and responsibilities.

Wayne Puppies is therefore seeking to hold the Township of Teaneck responsible for the significant damage caused to Wayne Puppies and the amounts expended and to be expended for the construction and operation of the Teaneck location of Wayne Puppies.

3D. Identify by name (if known) the public employees who you claim were at fault and any other information that will assist in identifying and locating the agents of the Township, if name is unknown.

Curtis Caviness, Teaneck’s Chief Registered Environmental Health Specialist and Health Department Township Manager; and Dean Kazinci, Township Manager, among others.

3E. Describe the wrongful acts or negligent acts of the Township and its employees which caused your damages.

See the response provided to Question 3C, above. More generally, the improper and unjustified reversal of the Township of Teaneck’s approval for Wayne Puppies to operate in Teaneck pursuant to an approved business plan was wrongful. As a result of the representations of Curtis Caviness, Teaneck’s Chief Registered Environmental Health Specialist and Health Department Township Manager, Wayne Puppies spent upwards of \$120,000 outfitting the Wayne Puppies location in Teaneck, New Jersey and also signed a five-year lease with rental obligations of \$144,000. Now, with the sudden and unjustified reversal, the amounts spent, and any amounts already paid and to be paid under the lease

¹ Per the Township of Teaneck’s website, the services provided by the Teaneck Health Department include: Public Health Administration, Retail Food Establishment inspections, environmental inspections, rental property inspections, property maintenance and code enforcement, dog & cat licensing, rabies control, public health nursing, health education, social services, vital statistics, municipal alliance against substance abuse.

agreement, are for naught as the Township of Teaneck is no longer allowing Wayne Puppies to operate its business in accordance with the approved plan.

3F. Identify by name and address all witnesses to the accident or occurrence.

Various representatives of the Township of Teaneck that were involved in the improper decision to revoke authority for Wayne Puppies to conduct business in Teaneck, including Curtis Caviness, Teaneck's Chief Registered Environmental Health Specialist and Health Department Township Manager.

Dean Kazinci, Township Manager

Attorneys at Trenk Isabel Siddiqi & Shahdanian, P.C.

Hilary Goldberg, Teaneck resident.

Local Teaneck businesses in the area of the Wayne Puppies location

Various contractors used by Wayne Puppies to build out the store, including Universal Contractors, Hofman's Glass, Bella Cleaning and Carting, LLC, Beta Iron Works, Inc., and LMP Low Voltage, LLC, among others

The landlord for the lease with NJ Puppy Store, LLC t/a Wayne Puppies

Alexandra Hofman, owner of NJ Puppy Store, LLC t/a Wayne Puppies

Steven Lozner, counsel for NJ Puppy Store, LLC t/a Wayne Puppies

3G. Identify by name (if possible) any police officer or other Township employee who investigated the accident.

Not applicable – the claim does not involve an “accident.”

3H. (i) Prior to the accident, did you, or to your knowledge anyone else, give notice to Teaneck of the problem that caused the accident.

Not applicable – the claim does not involve an “accident.”

4. CLAIM FOR DAMAGES:

Property damage and “other” damage. Wayne Puppies will be seeking the costs it incurred to buildout the store, and pay for rent, alarm, cable, and other utilities. See attached documents and information supporting the damages, which are described below:

- Rent for Wayne Puppies location: \$19600;
- Home Depot purchases: \$4403.23

- Tiles and flooring: \$3780.17
- Optimum online – cable: \$945.56
- PSE&G – utilities: \$3700
- Workers to construct location \$1800
- Permits: \$1937
- Architect: \$1500
- Wash machine \$480
- Chairs for store: \$180
- Tables \$480
- Attorney's fees: \$7050
- Plumbing \$8500
- Sign for the business and decorations: \$3700
- Cameras \$948.98
- Alarm System \$180
- Hofman's Glass: \$16,630.66
- Universal Contractor: \$18,200
- LMP Low Voltage: \$5500
- Beta Iron Works: \$9900
- Beta Iron Works: \$8406
- Bella Cleaning – Dumpsters \$1574
- Miscellaneous: \$750

Total Damages: \$120,145

5. HAVE YOU MADE A CLAIM AGAISNT ANYONE ELSE FOR ANY OF THE LOSSES OR EXPENSES CLAIMED IN THE NOTICE?

No.

6. INSURANCE:

6A. Are any of the losses or expenses claimed herein covered by any policy of insurance?

No.

7. OTHER COMPENSATION:

7A. Have you received or agreed to receive any money from anyone for the damages claimed herein?

No.

8. SUMMARY OF REQUIRED DOCUMENTATION:

8A. The following items must be submitted with this notice:

8A.1 Copies of itemized bills for each medical expense and other losses and expenses claimed. See attached invoices for various contractors as well as the damage details in Section 4, above.

8A.2 Full copies of all appraisals and estimates of property damage claimed by you. See attached invoices and documents.

8A.3 Copies of all written reports of all expert witnesses and treating physicians. None at this time, but see invoices of contractors, etc. that performed work on the property.

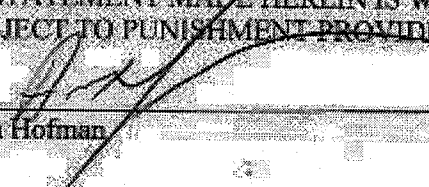
8A.4 A letter from your employer verifying your lost wages, if self-employed, a statement showing the calculations of your claimed lost income. None at this time. To be provided in further support of this claim.

8A.5 Copies of your insurance policies. None applicable.

8A.6 Copies of police report. Not applicable.

9. **CERTIFICATION:** I HEREBY CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE, THAT THE ATTACHED STATEMENTS, BILLS, REPORTS AND DOCUMENTS ARE THE ONLY ONES KNOWN TO ME TO BE IN EXISTENCE AT THIS TIME. I AM AWARE THAT IF ANY STATEMENT MADE HEREIN IS WILLFULLY FALSE OR FRAUDULENT, THAT I AM SUBJECT TO PUNISHMENT PROVIDED BY LAW.

Signature of Claimant:


Alexandra Hofman

10. **AUTHORIZATION TO OBTAIN MEDICAL RECORDS**
Not applicable.

TISS
TRENKISABEL
SIDDIGI &
SHAHAMIAN P.C.

WILLIAM F. KATZ, ESQ.
Sergeant at Law
1075 53rd Street, Apt. 10
New York, N.Y. 10015
212-512-1114 (residential)
212-512-1114 (office)
Fax: 212-512-1114
1075 53rd Street, Apt. 10
New York, N.Y. 10015

NOV 11 2022

3000 Avenue of the Americas
New York, New York 10013-2000

Attn: Mr. Siddig

Re: Sale of dogs and cats prohibited at 519 Court Lane, Tuxedo, N.Y.

Dear Mr. Siddig:

Enclosed are the zoning regulations of Tuxedo.

It has been brought to our attention that you recently acquired a pet store at the above location. All pet stores are regulated as a retail use under the zoning ordinance. The Township of Tuxedo is a village in order to permit the retail sale of dogs and cats (Article IX, § 10.1 of the Code of Ordinances, Tuxedo, New York, as amended by the Board of Trustees of Tuxedo, New York, dated 6-27-18). A copy of said ordinance is enclosed.

On March 22, 2022, the Board of Trustees of Tuxedo, New York, adopted a resolution to amend the zoning ordinance to require that all pet stores be licensed by the Board of Trustees of Tuxedo, New York, and that the regulations adopted hereunder shall be enforceable. The Board of Trustees of Tuxedo, New York, is hereby notified that you plan to bring with you animals in the future.

In addition, pet stores, kennels and shelters are required to be licensed by and approved by the local health department pursuant to N.Y.S.A. 4-19-1.8 and the regulations adopted hereunder (N.Y.S.A. 4-19-1.8(a)).

The issuance of a Certificate of Occupancy is limited to compliance with the Uniform Construction Code and the zoning ordinance. I do not intend to enforce the sale of dogs and cats in violation of Article IX of Chapter 6 of the Tuxedo Code nor does it exempt the pet store from the State's licensing and inspection requirements. In point of fact, the Certificate of Occupancy specifically provides for "No sale of live cats or dogs permitted per Sec. 6-63."

Please be advised that the Township will enforce the foregoing ordinance provisions. Please be guided accordingly.

Very truly yours,

Trenk Isabel Siddiqui & Shahdani, P.C.
Attorneys for the Township of Teaneck

By:  William F. Rupp, Esq.

cc: Dean Kacinski, Township Manager
John J. Shahdani, II, Esq.
Mark Bocchino, Construction Code Official
Curtiss Caviness, C.R.E.H.S.

Article IX. Sale of Dogs and Cats

[illegible]

As a result of the above, the authors have concluded that the use of the proposed method is effective in reducing the number of iterations required for the iterative solution of the problem.

[illegible]

1. Number of a series of consecutive cuts

THE UNIVERSITY OF CHICAGO

[illegible]

A 1955 advertisement for the College and Mills was said to have been printed in the German *Frankfurter Allgemeine Zeitung* and that it contained racist propaganda as defined by the law.

No part was available during the first 10 days after the onset of the disease. Yet, in this early period, the majority of patients (80%) did not manifest any symptoms. In contrast, patients with mild and moderate disease were able to walk and move their arms and legs, and some were able to perform simple tasks.

LAW OFFICE OF STEVEN W. LOZNER

ATTORNEY AT LAW

MEMBER OF NY BAR
MEMBER OF NJ BAR

18 BROWNSTONE WAY
UPPER SADDLE RIVER, NEW JERSEY 07458
TELEPHONE: (917) 620-5586

lozner.merchant@gmail.com

July 18, 2022

VIA REGULAR MAIL AND EMAIL TO WRUPP@TRENKISABEL.LAW

Trenk Isabel Siddiqi & Shahdanian P.C.
290 West Mount Pleasant Avenue
Building 3, Suite 2350
Livingston, NJ 07039

Attn: William F. Rupp, Esq.

Re: Wayne Puppies

Dear Mr. Rupp:

Please be advised that I represent Wayne Puppies in connection with the above-referenced matter. My client is in receipt of your letter addressed to it dated July 11, 2022, pursuant to which you requested further information regarding my client's proposed business plans.

My client plans to offer goods and services to its customers at its new location in Teaneck, New Jersey (the "Teaneck Location") in strict compliance with all state and local laws, including but not limited to engaging in the sale of pet food, grooming and other pet products, as well as offering grooming and other pet services.

As the Township of Teaneck is aware, my client also owns a Wayne Puppies store located in Wayne, New Jersey (the "Wayne Location"). In addition to offering goods and services to its customers at the Wayne Location, my client also sells puppies at the Wayne Location as expressly permitted by local ordinances in the Township of Wayne.

However, due to space limitations at the Wayne Location, as well as the timing of my client's ability to source ample USDA-approved puppies for sale at the Wayne Location, my client intends to periodically house certain puppies at the Teaneck Location pending sufficient capacity at the Wayne Location. At no time shall my client engage in any "sale, delivery, barter, auction, give away or other disposition of a dog" within the meaning of Chapter 6, Article IX, Sections 6.6 and 6.68 of the Code of the Township of Teaneck, New Jersey, 1964 (as amended, the "Teaneck Code") at the Teaneck Location. In the event that a customer expresses interest in any puppy temporarily housed in the Teaneck Location,

employees at the Teaneck Location will refer the customer to the Wayne Location, and the Wayne Location will process the sale of the puppy.

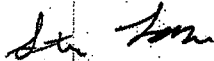
Both my client and I had numerous in-person and telephonic discussions with officials from the Township of Teaneck over the past several months in which we received firm assurances that the above-referenced proposed business plan was acceptable to the Township of Teaneck, as evidenced by the fact that the Township of Teaneck granted my client all required permits after clearing any potential issues with the health department.

Based on such assurances from the Township of Teaneck, my client decided to move forward with construction at the Teaneck location and has therefore incurred nearly \$100,000 in expenses and attorneys' fees in connection with the planned opening of the Teaneck Location, which cannot be recouped if the Teaneck Location does not open its doors.

Please kindly confirm that my client's proposed business plan as outlined above remains acceptable to the Township of Teaneck. My client and I are available to discuss any questions or concerns the Township of Teaneck may have.

Thank you in advance.

Sincerely,



Steven W. Lozner, Esq.

cc: Wayne Puppies

LAW OFFICE OF STEVEN W. LOZNER
ATTORNEY AT LAW

MEMBER OF NY BAR
MEMBER OF NJ BAR

18 BROWNSTONE WAY
UPPER SADDLE RIVER, NEW JERSEY 07458
TELEPHONE: (917) 620-5586

lozner.merchant@gmail.com

July 25, 2022

VIA REGULAR MAIL AND EMAIL TO WRUPP@TRENKISABEL.LAW

Trenk Isabel Siddiqi & Shahdanian P.C.
290 West Mount Pleasant Avenue
Building 3, Suite 2350
Livingston, NJ 07039

Attn: William F. Rupp, Esq.

Re: Wayne Puppies

Dear Mr. Rupp:

As you are aware, I sent you a letter on behalf of Wayne Puppies dated July 18, 2022 (the "Wayne Puppies Response Letter") responding to your letter addressed to Wayne Puppies dated July 11, 2022. A copy of the Wayne Puppies Response Letter is attached hereto as Exhibit A.

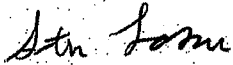
As a reminder, both my client and I had numerous in-person and telephonic discussions with officials from the Township of Teaneck over the past several months in which we received firm assurances that my client's proposed business plan as outlined in the Wayne Puppies Response Letter (the "Proposed Business Plan") was acceptable to the Township of Teaneck, as evidenced by the fact that the Township of Teaneck granted my client all required permits (**including a permit to house live animals**) after clearing any potential issues with the health department. My client has relied on such assurances, as well as other representations made by town officials from the Township of Teaneck.

My client has delayed the planned opening of the Teaneck Location (as defined in the Wayne Puppies Response Letter) pending a response from your office. To date, however, neither Wayne Puppies nor myself have received a response to the Wayne Puppies Response Letter. As such, unless I hear from you by July 29, 2022, Wayne Puppies shall (i) assume that the Proposed Business Plan remains acceptable to the Township of Teaneck and (ii) open its doors for business on August 1, 2022 and shall operate such business in accordance with the Proposed Business Plan based on prior firm assurances from town officials that the Proposed Business Plan was acceptable to the Township of Teaneck.

As previously indicated in the Wayne Puppies Response Letter, my client and I remain available to discuss any questions or concerns the Township of Teaneck may have.

Thank you in advance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Stn Lozner".

Steven W. Lozner, Esq.

cc: Wayne Puppies

EXHIBIT A

WAYNE PUPPIES RESPONSE LETTER

[Attached]

Subject: Wayne Puppies
Date: Saturday, July 16, 2022 at 2:54:25 PM Eastern Daylight Time
From: steven lozner
To: wrupp@trenkisabel.law
CC: Sasha Hofman
BCC: lozner.merchant@gmail.com
Attachments: Scan2022-07-16_145232.pdf

Dear Mr. Rupp:

Attached please find a letter on behalf of Wayne Puppies responding to your letter dated July 11, 2022.
Thanks.

Steven Lozner, Esq.
917-620-5586

LAW OFFICE OF STEVEN W. LOZNER
ATTORNEY AT LAW

MEMBER OF NY BAR
MEMBER OF NJ BAR

18 BROWNSTONE WAY
UPPER SADDLE RIVER, NEW JERSEY 07458
TELEPHONE: (917) 620-5586

lozner.merchant@gmail.com

July 18, 2022

VIA REGULAR MAIL AND EMAIL TO WRUPP@TRENKISABEL.LAW

Trenk Isabel Siddiqi & Shahdanian P.C.
290 West Mount Pleasant Avenue
Building 3, Suite 2350
Livingston, NJ 07039

Attn: William F. Rupp, Esq.

Re: Wayne Puppies

Dear Mr. Rupp:

Please be advised that I represent Wayne Puppies in connection with the above-referenced matter. My client is in receipt of your letter addressed to it dated July 11, 2022, pursuant to which you requested further information regarding my client's proposed business plans.

My client plans to offer goods and services to its customers at its new location in Teaneck, New Jersey (the "Teaneck Location") in strict compliance with all state and local laws, including but not limited to engaging in the sale of pet food, grooming and other pet products, as well as offering grooming and other pet services.

As the Township of Teaneck is aware, my client also owns a Wayne Puppies store located in Wayne, New Jersey (the "Wayne Location"). In addition to offering goods and services to its customers at the Wayne Location, my client also sells puppies at the Wayne Location as expressly permitted by local ordinances in the Township of Wayne.

However, due to space limitations at the Wayne Location, as well as the timing of my client's ability to source ample USDA-approved puppies for sale at the Wayne Location, my client intends to periodically house certain puppies at the Teaneck Location pending sufficient capacity at the Wayne Location. At no time shall my client engage in any "sale, delivery, barter, auction, give away or other disposition of a dog" within the meaning of Chapter 6, Article IX, Sections 6.6 and 6.68 of the Code of the Township of Teaneck, New Jersey, 1964 (as amended, the "Teaneck Code") at the Teaneck Location. In the event that a customer expresses interest in any puppy temporarily housed in the Teaneck Location,

employees at the Teaneck Location will refer the customer to the Wayne Location, and the Wayne Location will process the sale of the puppy.

Both my client and I had numerous in-person and telephonic discussions with officials from the Township of Teaneck over the past several months in which we received firm assurances that the above-referenced proposed business plan was acceptable to the Township of Teaneck, as evidenced by the fact that the Township of Teaneck granted my client all required permits after clearing any potential issues with the health department.

Based on such assurances from the Township of Teaneck, my client decided to move forward with construction at the Teaneck location and has therefore incurred nearly \$100,000 in expenses and attorneys' fees in connection with the planned opening of the Teaneck Location, which cannot be recouped if the Teaneck Location does not open its doors.

Please kindly confirm that my client's proposed business plan as outlined above remains acceptable to the Township of Teaneck. My client and I are available to discuss any questions or concerns the Township of Teaneck may have.

Thank you in advance.

Sincerely,



Steven W. Lozner, Esq.

cc: Wayne Puppies



290 W. Mt. Pleasant Ave., Suite 2350, Livingston, NJ 07039

William F. Rupp, Esq.
wrupp@trenkisabel.law
(973) 533-1000 (office)
(973) 327-0243 (direct)
(201) 394-0312 (mobile)

Respond to Branch Office at:
45 Essex Street, Suite 106
Hackensack, New Jersey 07601

July 25, 2022

Law Office of Steven W. Lozner
18 Brownstone Way
Upper Saddle River, N.J. 07458

Re: Wayne Puppies

Dear Mr. Lozner:

According to the records of the Township of Teaneck, your client was advised of the Teaneck ordinance prohibition on the sale of dogs and cats before obtaining a certificate of occupancy. As noted in my previous letter, the certificate of occupancy itself sets forth the applicable ordinance prohibition.

The ordinance defines "offer for sale" as "to sell, offer for sale or adoption, advertise for the sale of, barter, auction, give away or otherwise dispose of a dog or cat." (Sec. 6-67 of Article IX of Chapter 6 of the Code of the Township of Teaneck)

Sec. 6-68 provides that "No pet store shall sell, deliver, offer for sale, barter, auction, give away or otherwise transfer or dispose of cats or dogs. Nothing in this section shall prohibit stores from collaborating with animal care facilities or animal rescue organizations to offer space for such entities to showcase adoptable dogs and cats."

As I understand your letter dated July 18, 2022, your client intends to house and display puppies at the Teaneck location and should a customer wish to purchase same, you will refer the customer to the Wayne location where he/she will be able to pay for and pick up the puppy which was displayed at your Teaneck location.

Please be advised that the Township of Teaneck considers such a practice as the "offer for sale" of puppies in violation of the ordinance.

The only display permitted is in collaboration with an animal care facility or animal rescue organization to showcase adoptable dogs for the rescue and placement of

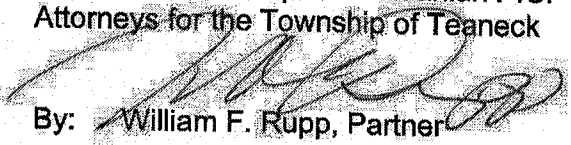
animals in permanent homes. Your client's Wayne facility is neither an animal care facility nor an animal rescue organization as defined in the ordinance.

Should your client engage in the practice of offering for sale puppies as outlined above, the Township of Teaneck intends to issue summonses and prosecute to the fullest extent of the law.

Please guide your client accordingly.

Very truly yours,

Trenk Isabel Siddiqi & Shahdanian P.C.
Attorneys for the Township of Teaneck

By:  William F. Rupp, Partner

cc: Dean Kazinci, Township Manager

LAW OFFICE OF STEVEN W. LOZNER
ATTORNEY AT LAW

MEMBER OF NY BAR
MEMBER OF NJ BAR

18 BROWNSTONE WAY
UPPER SADDLE RIVER, NEW JERSEY 07458
TELEPHONE: (917) 620-5586

lozner.merchant@gmail.com

July 26, 2022

VIA REGULAR MAIL AND EMAIL TO WRUPP@TRENKISABEL.LAW

Trenk Isabel Siddiqi & Shahdani P.C.
290 West Mount Pleasant Avenue
Building 3, Suite 2350
Livingston, NJ 07039

Attn: William F. Rupp, Esq.

Re: Wayne Puppies

Dear Mr. Rupp:

This letter is in response to your letter dated July 25, 2022. Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in my letter addressed to you dated July 18, 2022 or my letter addressed to you dated July 25, 2022, as the context so requires.

As a preliminary matter, your client's assertion that my client's Proposed Business Plan constitutes an "offer for sale" under the Teaneck Code is preposterous and is simply not supported by the clear text of the Teaneck Code. This strained interpretation of the Teaneck Code will be vehemently disputed in the event that this matter goes to litigation.

More importantly, it is clear by your letters that you have not yet been apprised of the material facts relating to this matter. During the Township of Teaneck's thorough and lengthy approval process relating to my client's Proposed Business Plan, my client and I had several extensive conversations with Curtis Caviness, Teaneck's Chief Registered Environmental Health Specialist and Health Department Township Manager. During those conversations, Mr. Caviness and I specifically discussed the language set forth in the Teaneck Code as it relates to my client's Proposed Business Plan (including but not limited to my client's intention to build cages to house live puppies in open view to the public at the Teaneck Location).

Mr. Caviness expressly represented to my client and I that, notwithstanding the prohibitions set forth in the Teaneck Code, the Township of Teaneck would not consider my client's intent to house live puppies in open view to the public at the Teaneck Location

to constitute a "sale, delivery, offer for sale, barter, auction, give away or other disposition of a dog" at the Teaneck Location within the meaning of Chapter 6, Article IX, Sections 6.6 and 6.68 of the Code of the Township of Teaneck, New Jersey, 1964 (as amended, the "Teaneck Code") or any related ordinances. Accordingly, Mr. Caviness assured us that the Township of Teaneck would not take any adverse action against my client under the Teaneck Code as long as my client adhered to its Proposed Business Plan. Further, in a subsequent conversation my client and I had with Mr. Caviness, he assured us that the Township of Teaneck had expressly approved our detailed description of my client's Proposed Business Plan (including my client's intention to build cages to house live puppies in open view to the public at the Teaneck Location), as evidenced by the construction permit granted by the Township of Teaneck to my client, which prominently states "LIVE PET STORE". For the avoidance of doubt, Mr. Caviness was also made aware that the permit granted by the Township of Teaneck for a "LIVE PET STORE" was not for the purpose of collaborating with any animal care facility or animal rescue organization.

Please be advised that we have recently been contacted by certain Teaneck town officials regarding a petition that was posted by Hillary Goldberg on Change.org and re-circulated via numerous social media platforms, a copy of which is attached hereto as Exhibit A. This petition seeks to prevent my client's business from opening based on false and defamatory accusations lodged by Ms. Goldberg on such petition. We are also aware that Ms. Goldberg has spearheaded an effort to enlist other Teaneck residents to sign her petition and to apply strong political pressure on the Township of Teaneck to shut my client's business down in an attempt to further her political aspirations. As you are aware, Ms. Goldberg recently ran as a political candidate for Teaneck Town Counsel and targeted certain elected Teaneck officials based on what she perceived to be widespread inaction on the part of certain currently elected Teaneck officials. Ms. Goldberg is therefore using my client's business as a platform to further her political career.

Since Teaneck town officials are aware of Ms. Goldberg's efforts to harm my client's business and to apply political pressure on such officials, it is quite obvious that the reason why these elected Teaneck officials are now attempting to revoke the Township of Teaneck's previously granted approval of my client's Proposed Business Plan is that they are bowing to extreme political pressure at the expense of my client and with reckless disregard for the interests of Teaneck business owners generally.

Based on the Township of Teaneck's sudden reversal of its previous express approval of my client's Proposed Business Plan, it appears that the Township of Teaneck has made numerous material and intentional and/or grossly negligent misrepresentations to my client. **You are hereby put on notice that my client has relied to its detriment on such material misrepresentations and has suffered substantial damages as a direct result.**

As previously mentioned, my client decided to move forward with construction at the Teaneck Location based on such material misrepresentations and has therefore incurred nearly \$100,000 in expenses and attorneys' fees in connection with the planned opening of the Teaneck Location. In addition, my client is bound by a 5-year lease at the Teaneck

Location, with total rent payments due in the amount of \$144,000 during the term of such lease.

Accordingly, unless the Township of Teaneck agrees no later than July 29, 2022 to either (i) reimburse my client in full for all expenses it has incurred to date in connection with the planned opening of the Teaneck Location or (ii) confirm that my client's Proposed Business Plan remains acceptable to the Township of Teaneck, my client intends to (x) seek an injunction to prevent the Township of Teaneck from issuing any summonses or prosecuting my client pending a final, non-appealable adjudication of this matter and (y) sue the Township of Teaneck in civil court for significant compensatory and punitive damages, as well as for all attorney's fees incurred in connection with this matter. It is anticipated that I will be asked to provide sworn testimony in connection therewith.

I trust your client will be guided accordingly.

Sincerely,



Steven W. Lozner, Esq.

cc: Wayne Puppies

EXHIBIT A

CHANGE.ORG PETITION

[Attached]



At 500 signatures, this petition is more likely to be featured in recommendations!

Keep Wayne's Puppies out of Teaneck!

240 have signed. Let's get to 500!



At 500 signatures, this petition is more likely to be featured in recommendations!



Hillary Goldberg signed this petition



Hillary Goldberg started this petition

Have you ever wondered where that cute dog in the pet store window came from? That tiny adorable puppy has had a rough life behind it. That poor dog came from a puppy mill.

Puppy mills are the industry that is essentially a puppy factory who sells their dogs in bulk to pet stores. These are also a significant number of breeders. Puppy mills jobs are to produce the cute, popular, "pure" bred dogs. Their main focus is their profit, not the dogs. They want to maximize profit and minimize spending.

In order to do this, the dogs are kept in small cages, poor nutrition, poor vetting. The mothers are bred until they no longer can, and are then either killed or if a rescue managers to save them, they will go to a rescue. The cages they are in are rarely cleaned, and leads to disease, sickness, growths on their body. When they are cleaned, the workers simply use a powerful hose to spray the cages clean, with the dogs inside the cage. Dogs have lost eyes due to the powerful water.

Dogs are emaciated, because their very little food portion is contaminated, and their water bowls are filled with algae. So these dogs are practically skin and bones, so how would they be in the shape to breed? Confusingly, puppy mills still pull off breeding millions of dogs at these fast rates. A female dog is used to breed until she can't anymore. Then instead of having that poor dog have a happy ever after, the puppy mills shoot those dogs because

they aren't able to breed, because otherwise they will be taking up space in their puppy mills.

The best way to stop this is to stop buying dogs from pet stores and online. There are millions of dogs available for adoption, of every breed and every age. The process is harder to adopt because rescues go through a vigorous vetting process to ensure that the adopting family is the best fit for the dogs, and the dog is the best fit for the adopting family.

In Teaneck, we have an ordinance that does not allow the sale of dogs or cats. However, as with any other unethical, immoral, or illegal practice, there are loopholes to be found. Currently, Wayne's puppies is set to open on Cedar Lane in Teaneck, NJ. The premise of this not for sale puppy store, is that it is essentially a showroom for dogs, and then you are sent to their Wayne store to purchase the dogs, where it is legal to do so. This unethical behavior must be stopped and Wayne's puppies is not welcome in Teaneck. Teaneck is not a place dogs are for sale.

We petition the Teaneck Township Council, the Health Department, the Zoning Board of Adjustment, the Zoning Sub-Committee to pass an ordinance that will not allow dogs to be sold in our stores, or used as a showroom for neighboring towns that do allow this inhumane practice. Do NOT let Wayne's Puppies to open in Teaneck!



Start a petition of your own

This petition starter stood up and took action. Will you do the same?

Updates

200 supporters

11 hours ago

Hillary Goldberg started this petition

21 hours ago



Beta iron works inc

Invoice

31 Pasadena ave Lodi N.J. 07644

973-815 2730 betaironworks@hotmail.com

www.betaironwork.com

Bill To

Wayne puppies

319 cedar lane Teaneck N.J

Date	Invoice No	P.O. Number	Terms	Project
04/12/22	265			

Item	Description	Quantity	Rate	Amount
Reiling	Reiling made from 1/2"sq	44	225.00	9,900.00T
	Sales Tax		0.00%	0.00
Subtotal				\$9,900.00
Payments/Credit				\$-9,900.00
Balance Due				\$0.00

1 of 1

Beta iron works inc

Invoice

31 Pasadena ave Lodi N.J. 07644

973-815 2730 betaironworks@hotmail.com

www.betaironwork.com

Bill To
Wayne puppies
319 cedar lane Teaneck N.J

Date	Invoice No.	P.O. Number	Terms	Project
04/12/22	266			

Item	Description	Quantity	Rate	Amount
1	S S Grills 22"x24"	18	365.00	6,570.00T
S S 5/8 mesh	Staines steel mesh 5/8" opening	2	918.00	1,836.00T
	Sales Tax		0.00%	0.00
Subtotal				\$8,406.00
Payments/Credit				\$-8,406.00
Balance Due				\$0.00

Universal Construction

Contractors Invoice

WORK PERFORMED AT:

Wayne puppies
319 Cedar Lane Tequesta, FL

TO:

DATE:

WORK ORDER NO.:

CONTRACT NO.:

DESCRIPTION OF WORK PERFORMED

Demolition:

Demolishing old furniture, removed old floor, damage, sheetrock.

Installed new flooring 1500 Sq Ft

\$ 4,500.00

Repaired and partially installed new sheetrock, Spackle and paint

\$ 2,200.00

Framing work

\$ 5,000.00

Install Tile 450 Sq Ft
inside the crates

\$ 4,500.00

Repair and install new track and install new ceiling Tiles

\$ 2,000.00

Total Labor \$ 18,200.00

All Material is guaranteed to be as specified, and the above work was performed in accordance with the drawings and specifications provided for the above work and was completed in a substantial workmanlike manner for the agreed sum of

Dollars (\$)

This is a ☐ Partial ☐ Full invoice due and payable by:

In accordance with our ☐ Agreement ☐ Proposal

No.

Dated

Hofman's Glass

Mailing Address:
1316 North Dixie Hwy.
Hollywood, Florida 33020

NJ Pet Store
519 Cedar Lane
Teaneck, New Jersey 07666

Invoice #28915

Issued 08/02/2022
Due 09/01/2022
Paid 08/02/2022
Phone 718-871-3200
Website www.HofmanGlass.com

For Services Rendered

PRODUCT / SERVICE	DESCRIPTION	QTY.	UNIT PRICE	TOTAL
Storefront Entrance door	Removal of old entrance door. Fabrication and installation of new aluminum entrance door system. Door used will be 3' x 7' narrow stile aluminum door. All framing used is 1 3/4 x 4 1/2 pocket tube set. Door will come with: Full height piano hinge. Surface mounted door closer. Standard deadbolt lock. 1/4 clear laminated glass. Sidelite will have high sill to match the bottom of the door height. Opening will be sealed all around.	1	\$4,900.00	\$4,900.00
plexi	Installed new plexi glass for each cage.	11	\$475.00	\$5,225.00
Mirror	Removal of mirrors from wall.	1	\$950.00	\$950.00
cladding	Installed new 1/8" aluminum trim angles around every cage. miters on each pc.	1	\$4,200.00	\$4,200.00

Thank you for your business. Please contact us with any questions regarding this invoice.

Subtotal	\$15,275.00
Tax (8.875%)	\$1,355.66
Total	\$16,630.66
Paid	-\$16,630.66
Invoice balance	\$0.00

INVOICE

Date: 08/03/2022

INVOICE # 465

To

WAYNE PUPPIES
Attn: Sasha Hoffman
519 Cedar Lane
Teaneck, New Jersey 07666
SashaH43@yahoo.com

Salesperson

Job

Payment Terms

Due Date

A

B

C

D

IL

Qty

Description

Unit Price

Line Total

CCTV System

Included

Included

8

Cameras

Purchased by Client

Purchased by Client

1

Recorder

Purchased by Client

Purchased by Client

10

Runs to Interconnect the Cameras

\$125.00

\$1,250.00

1

Programming

\$750.00

\$750.00

1

LABOR

\$1,000.00

\$1,000.00

Subtotal

\$3,000.00

Burglar System

2

Key Pads

\$250.00

\$500.00

2

Hard Wire Motion Detectors

\$100.00

\$200.00

1

Silent Back Up Batteries

\$120.00

\$120.00

1

Main Board

\$500.00

\$500.00

2

Contact for Front/Back

\$75.00

\$150.00

1

One (1) Year of monitoring by Rilco Security System

\$150.00

\$150.00

1

LABOR

\$880.00

\$880.00

Subtotal

\$2,500.00

Sales Tax

Included

Total

\$5,500.00

Make all checks payable to LMP Low Voltage, LLC

Thank you for your business!

LMP Low Voltage, LLC 65 South Street, Passaic, New Jersey 07055 Phone: 201-370-8629

LAW OFFICE OF STEVEN W. LOZNER
ATTORNEY AT LAW

MEMBER OF NY BAR
MEMBER OF NJ BAR

18 BROWNSTONE WAY
UPPER SADDLE RIVER, NEW JERSEY 07458
TELEPHONE: (917) 620-5586

lozner.merchant@gmail.com

July 1, 2022

Hillary Goldberg
984 Queen Anne Road
Teaneck, NJ 07666

Re: Change.org Petition – Wayne Puppies

Dear Ms. Goldberg:

Please be advised that I represent Wayne Puppies in connection with the above-referenced matter. It has come to our attention that you have started a petition on Change.org seeking others to support your attempts to interfere with Wayne Puppies' business. Further, you have attached links to your Change.org petition on Facebook and other social media websites, and have invited others to leave derogatory comments on your postings. A copy of your Change.org petition is attached hereto as Exhibit A.

On your Change.org petition, you knowingly make numerous false and misleading statements about my client, its business, and its breeders. For example, you knowingly and misleadingly suggest that my client's puppies come from so-called "puppy mills", which as you know is a derogatory term used to describe the horrific conditions some unfortunate puppies endure with unscrupulous breeders. However, since you tout having full access to all public records on your social media posts, you know full well that all of the puppies sold by Wayne Puppies come from USDA licensed breeders that are subject to the most stringent health and safety requirements. In particular, these USDA licensed breeders are routinely subject to regular, unannounced government inspections, the facilities these breeders operate are always clean and immaculate, the puppies they raise are well-fed, well-treated, receive regular daily exercise, and receive full medical examinations and all required vaccines.

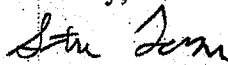
In addition to the above-referenced false and misleading statements, you further attempt to damage my client's business and reputation by falsely stating that the breeders that sell puppies to my client keep the puppies "in small cages" that are "rarely cleaned", which "leads to disease, sickness, growths on their body". You also falsely state that these puppies receive "poor nutrition" and that "[d]ogs have lost eyes due to the powerful water" and that after the mothers can no longer breed, they are "killed . . . or . . . go to a rescue" and that the breeders "shoot those dogs".

You are hereby put on notice that these knowingly false and misleading statements constitute libel, defamation and tortious interference with contractual relations, which are actionable in a court of law. Your defamatory statements have already caused my client significant economic and reputational damages, for which my client is entitled to restitution.

Accordingly, unless you immediately remove both your Change.org petition and all related links, comments and posts on Facebook and other social media platforms, my client intends to seek an injunction and sue you in civil court for significant compensatory and punitive damages, as well as for all attorney's fees incurred in connection with this matter. In addition, my client is aware that you are currently running for political office in Teaneck, New Jersey. Please be further advised that my client is in the process of exploring whether your reckless actions constitute one or more violations of state and federal political campaign laws.

I trust you will be guided accordingly.

Sincerely,



Steven W. Lozner, Esq.

EXHIBIT A

CHANGE.ORG PETITION

[Attached]



At 500 signatures, this petition is more likely to be featured in recommendations!

Keep Wayne's Puppies out of Teaneck!

240 have signed. Let's get to 500!



At 500 signatures, this petition is more likely to be featured in recommendations!



Hillary Goldberg signed this petition



Hillary Goldberg started this petition

Have you ever wondered where that cute dog in the pet store window came from? That tiny adorable puppy has had a rough life behind it. That poor dog came from a puppy mill.

Puppy mills are the industry that is essentially a puppy factory who sells their dogs in bulk to pet stores. These are also a significant number of breeders. Puppy mills jobs are to produce the cute, popular, "pure" bred dogs. Their main focus is their profit, not the dogs. They want to maximize profit and minimize spending.

In order to do this, the dogs are kept in small cages, poor nutrition, poor vetting. The mothers are bred until they no longer can, and are then either killed or if a rescue manager to save them, they will go to a rescue. The cages they are in are rarely cleaned, and leads to disease, sickness, growths on their body. When they are cleaned, the workers simply use a powerful hose to spray the cages clean, with the dogs inside the cage. Dogs have lost eyes due to the powerful water.

Dogs are emaciated, because their very little food portion is contaminated, and their water bowls are filled with algae. So these dogs are practically skin and bones, so how would they be in the shape to breed? Confusingly, puppy mills still pull off breeding millions of dogs at these fast rates. A female dog is used to breed until she can't anymore. Then instead of having that poor dog have a happy ever after, the puppy mills shoot those dogs because

they aren't able to breed, because otherwise they will be taking up space in their puppy mills.

The best way to stop this is to stop buying dogs from pet stores and online. There are millions of dogs available for adoption, of every breed and every age. The process is harder to adopt because rescues go through a vigorous vetting process to ensure that the adopting family is the best fit for the dogs, and the dog is the best fit for the adopting family.

In Teaneck, we have an ordinance that does not allow the sale of dogs or cats. However, as with any other unethical, immoral, or illegal practice, there are loopholes to be found. Currently, Wayne's puppies is set to open on Cedar Lane in Teaneck, NJ. The premise of this not for sale puppy store, is that it is essentially a showroom for dogs, and then you are sent to their Wayne store to purchase the dogs, where it is legal to do so. This unethical behavior must be stopped and Wayne's puppies is not welcome in Teaneck. Teaneck is not a place dogs are for sale.

We petition the Teaneck Township Council, the Health Department, the Zoning Board of Adjustment, the Zoning Sub-Committee to pass an ordinance that will not allow dogs to be sold in our stores, or used as a showroom for neighboring towns that do allow this inhumane practice. Do NOT let Wayne's Puppies to open in Teaneck!



Start a petition of your own

This petition starter stood up and took action. Will you do the same?

Updates

200 supporters

11 hours ago

Hillary Goldberg started this petition

21 hours ago

Hillary Goldberg for Teaneck Council

Building a Better CommUNITY

VOLUNTEER!

Let's Build a Better CommUNIT Y Together!



Name (required)

Email (required)

Message

Submit

MEET HILLARY GOLDBERG EVENTS VOLUNTEER! VOTER INFORMATION DONATE TODAY!

HILLARY AROUND TEANECK

Hillary Goldberg for Teaneck Council, Powered by WordPress.com.

Bella Cleaning & Carting LLC**INVOICE****SOLD TO:**

Name Sasha
Address 519 Cedar Lane
City, State, ZIP Teaneck NJ
Phone 201.951.0027
Fax
Email
Job:

INVOICE NUMBER T522
INVOICE DATE May 22, 2022
Bella ORDER NO.
Vendor ORDER NO.
TERMS
SALES REP Ben Raabe
SHIPPED VIA
F.O.B.
PREPAID or COLLECT COLL

Sales Tax Rate:

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	Pick up date 5/4/22		
1.00	Trucking	300.00	300.00
5.90	5.90 tons at \$100 per ton	100.00	590.00
1.00	Fuel surcharge		25.00
		SUBTOTAL	915.00
		Payment	0.00
		TOTAL	\$915.00

DIRECT ALL INQUIRIES TO:

Ben Raabe
201.788.8365
email: bellacleanouts@gmail.com

MAKE ALL CHECKS PAYABLE TO:

Bella Cleaning & Carting
Attn: Accounts Receivable
14-24 Abbott Road, Suite 413
Fair Lawn, NJ 07410

PAY THIS
AMOUNT

THANK YOU FOR YOUR BUSINESS!

Bella Cleaning & Carting LLC**INVOICE****SOLD TO:**

Name Sasha
Address 519 Cedar Lane
City, State, ZIP Teaneck NJ
Phone 201.951.0027
Fax
Email
Job:

INVOICE NUMBER T1219
INVOICE DATE December 19, 2021
Bella ORDER NO.
Vendor ORDER NO.
TERMS
SALES REP Ben Raabe
SHIPPED VIA
F.O.B.
PREPAID or COLLECT COLL

Sales Tax Rate:

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1.00	Delivery of 20 yard container	275.00	275.00
3.84	3.84 tons at \$100 per ton	100.00	384.00
		SUBTOTAL	659.00
		Payment	0.00
		TOTAL	\$659.00

DIRECT ALL INQUIRIES TO:

Ben Raabe
201.788.8365
email: bellacleanouts@gmail.com

MAKE ALL CHECKS PAYABLE TO:

Bella Cleaning & Carting
Attn: Accounts Receivable
14-24 Abbott Road, Suite 413
Fair Lawn, NJ 07410

PAY THIS
AMOUNT

THANK YOU FOR YOUR BUSINESS!

From: Susan Walters <swalters@teanecknj.gov>
Sent: Wednesday, November 3, 2021 9:28 AM
To: SASHAH63@YAHOO.COM
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:45 2023] 519 CEDAR LANE
Attachments: 20211103092745066.pdf

Have a blessed and beautiful day 😊
Susan Walters-Roebuck (Technical Assistant)

This email and any files transmitted with it are privileged and confidential and may be considered advisory, consultative and deliberative material under OPRA. This communication is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this email. Please notify the sender immediately by email if you have received this email by mistake and delete this email from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.



Teaneck Township
ZONING OFFICER
818 TEANECK ROAD
TEANECK, NJ 07666
(201) 837-1600 FAX(201) 837-4802
DMELFI@TEANECKNJ.GOV

Application Date: 10/18/2021
Application Number: 20210887
Permit Number: _____
Project Number: _____

Fee: \$250

Denial of Application

Date: 10/27/2021

To: ALEXENDRA HOFMAN
16-10 ALDEN TERRACE
FAIR LAWN, NJ 07410

CC: APP TELE:(201) 951-0027
APP EMAIL:SASHAH63@YAHOO.COM

RE: 519 CEDAR LANE
BLOCK: 818 LOT: 12 QUAL: ZONE: MX-1

DEAR ALEXENDRA HOFMAN,
LIVE PET STORE - PUPPIES ONLY AS PER DOCUMENTS SUBMITTED THROUGH 10-20-2021.

INCOMPLETE:
Waiting on attorney input on use viability in MX-1 zone.

SUBMITTAL OF ANY NEW DOCUMENTS MAY REQUIRE ADDITIONAL VARIANCES OR WAIVERS

Sincerely,

ADAM MYSZKA, ASSISTANT ZONING OFFICER

opra@totopra.com

From: Yahoo! <sashah63@yahoo.com>
Sent: Wednesday, January 19, 2022 12:54 PM
To: strinidad@teanecknj.gov
Subject: [Forwarded from DataCove] [Mon Mar 20 18:32:30 2023] 519 Cedar Lane

My name is Alexandra Hofman I own the place 519 Cedar Lane I am changing plumbing contractor his name is Gennaro Loboizzo
1/19/22
Sent from my iPhone