

GENOVA BURNS LLC

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Bibi Taylor and Edward T. Oatman

BIBI TAYLOR and EDWARD T. OATMAN,
Plaintiffs,

v.

CAROLYN BRINK, JOHN and JANE DOES 1-
10 and ABC CORPS. 1-10,

Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY
Docket No:

CIVIL ACTION

AMENDED COMPLAINT

Plaintiffs Bibi Taylor and Edward T. Oatman, by and through their attorneys, Genova Burns LLC, hereby file this Amended Complaint, alleging as follows:

NATURE OF THE ACTION

Plaintiffs bring this action in response to a malicious and persistent campaign by defendant to malign each of them both personally and professionally. Plaintiffs have been made victims of a relentless parade of outrageous, false, and defamatory statements at the hands of defendant. Plaintiffs are highly respected public servants in the Union County government. While cognizant that their positions provoke public criticism, the statements repeatedly published by defendant on social media, orally and otherwise, have crossed the line from opinion to defamation and unlawful harassment. Specifically, defendant has published vicious allegations against plaintiffs stating that

they have committed a number of crimes, including theft, fraud, improper acceptance and/or making of illegal campaign contributions, laundering, felony theft and having numerous aliases to defraud.

Defendant has personalized such venom, leveling claims of illicit promiscuity and an adulterous affair between plaintiffs. The collection of these statements are patently untrue and defendant knows that. Yet defendant persists in repeating these untruths even after having previously retracted such statements and acknowledging the falsity of her statements and apologizing to Taylor. Defendant having resumed and persisted in her scurrilous attacks, doubling down on her malicious defamation of defendants, and with the cloak of her anonymity unveiled, this action ensued.

PARTIES

1. Plaintiff Bibi Taylor (“Taylor”) is the Director of the Union County Finance Department. She has served as the Director of Finance, County Treasurer and Certified Chief Financial Officer to the County of Union for over ten (10) years. In addition to that role, she is also a project manager to the Union County Improvement Authority (“UCIA”).

2. Plaintiff Edward T. Oatman (“Oatman”) (collectively with Taylor, “Plaintiffs”) is the Union County Manager, a role which he has served in for five (5) years.

3. Defendant Carolyn Brink (“Defendant” or “Brink”) is a resident of Fanwood, New Jersey, and the owner of Daly Brink Public Affairs LLC, a public relations firm located in Fanwood, New Jersey.

4. Upon information and belief, John and Jane Does 1-10 and ABC Corps 1-10, all of said names being fictitious, all assisted in the publication of, and/or published the false and defamatory statements against Plaintiffs.

VENUE AND JURISDICTION

5. This action is initiated in the Superior Court of New Jersey, Union County, as the facts and circumstances giving rise to these claims occurred within the boundaries of this vicinage. Accordingly, pursuant to R. 4:3-2, venue is properly laid in the County of Union.

FACTUAL BACKGROUND COMMON TO ALL CLAIMS

A. Plaintiffs' Employment History with Union County

6. Ms. Taylor began her employment with Union County in or about 2011, as the Director of Finance.

7. Since that time, she has taken on numerous roles within the County, including: (1) an assignment to assist with financial record management at the UCIA; (2) project and financial management of the UC Government Complex project; and (3) appointment as the UCIA Chief Operating Officer.

8. Mr. Oatman has more than 20 years of governmental experience and on March 1, 2018, began his career with Union County as the County Manager – the 12th top executive under the County Manager form of government.

9. Mr. Oatman is responsible for the day-to-day operations and budget of a 21-municipality government with approximately 2,800 full-time employees, as well as implementation of the Board of County Commissioners' policies.

B. Brink's Threats to Taylor and Initial Defamation

10. On February 12, 2021, Taylor emailed Mark Brink ("Mark") – Brink's husband and an administrative analyst for the UCIA – to inquire about the status of a project she had asked him to complete by that day.

11. Mark responded: “still in progress. Should have something by next Friday 2/9 COB.”

12. Taylor advised Mark that:

As previously discussed, if you can’t meet a deadline, it is up to you to request additional time in advance of the due date versus waiting for me to ask for an update on said assignment. Please be guided accordingly. Failure to adhere to timelines may be cause for disciplinary actions. Should you have any questions regarding the above, please let me know.

13. Two days later, on or about February 14, 2021, Brink sent Taylor two emails concerning the exchange between Taylor and Mark, which were threatening and harassing in nature.

14. Brink wrote the following to Taylor, in part:

- a. Please send me your contact information and availability so we can have a direct conversation to clear some disturbing communication as soon as possible. I will not allow my husband to be spoken to in any, and let me repeat, in **any** correspondence that even alludes to disciplinary action after his outstanding, exemplary and impeccable record over the last 8 years in his exemplary service to the County of Union.
- b. Bibi, woman to woman, I hope we can find a time and place to meet so we can find some common ground. I don’t need to tell you that emails as you sent last week referring to disciplinary action will lead to more problems than you may be aware of. I am happy to clarify that at our meeting.
- c. I trust no other unwarranted and demeaning emails will be sent to Mark’s way or this will indeed become a fast-tracked HR matter with aggression and unnecessary abuse and clearly alluded job insecurity.

15. In a follow up email approximately 20 minutes later, Brink provided Taylor with a summary of her employment and company, Daly Brink Public Affairs LLC, where their “real expertise is exposing any and all corruption in local and statewide campaigns . . . [and] are known

for reputation management and exposing conflict of interests on local, state and federal levels and using the local media and prosecutors as a conduit.”

16. Brink ended this second email by stating “[j]ust thought you should know more about me as you have oddly not asked Mark what his wife does for a living. Well, now you know.”

17. The next day on February 15, 2021, Brink published several Facebook posts including posting an article published by the New Jersey Globe titled, “Bibi Taylor seeking Assembly seat in 21st District – New Jersey Globe” with the following statement: “Haven’t we had enough of power hungry narcissists who are only out for themselves?”

18. In response to the following comment made on the article “... and she badmouths your husband?” Brink stated:

Brian G. Anderson oh, yes, every f&cking day because she gets off on it for some sicko reason. Meanwhile, he just does his job and stays as far away from this psycho as possible.

19. Brink then falsely stated that Taylor: “Just gave herself a \$60,000 raise during a pandemic where so many are hurting.”

20. That same day Brink posted the following statements on her Facebook account:

Knowing Mark as well as many of you do, would you ever, ever put him in a category where a completely unleashed and unanswerable manager can and is abusing him with zero consequences. My GOD, the man has been a Prince his entire life including his love and admiration for his parents, siblings, nieces, nephews, cousins, in-laws and especially his wife (me!). He is the epitome and example we all strive for. Yet, he has the horrid, abusive demeaning and narcissistic boss that we are exasperated with just ringing the bell about her daily abuses. How the F is that even right? Who the hell is allowing this to continue? Signed, a very loving but exhausted wife.

21. Thirty minutes later, Brink posted again:

Bibi Taylor. That is her name. She is a wretched witch that rules her tiny, itty, bitty section of nowheresville in Union County, New

Jersey. Her husband is an attorney and lobbyist for a company called DIGroupArchitects that were just awarded a \$100M contract to build a “new” Administrative Building in Elizabeth. Guess who gets to approve all of the invoices and contracts? That’s right, Bibi Taylor (wife of DIGroupArchitects lawyer/lobbyist). Why is this allowed AT TAXPAYER EXPENSE? NJ may believe they are immune from NYC press, but I challenge that wholeheartedly.

22. None of the above quoted text was authorized for use in this or any publication by Taylor, and falsely alleged an improper and/or illegal financial and/or legal relationship between DIGroupArchitecture (“DIGroup”) and, Ms. Taylor and her husband.

23. A February 16, 2021 letter from DIGroup to UCIA’s counsel confirmed that there was no such relationship between Ms. Taylor or her husband, and DIGroup, nor any \$100 million dollar contract.

24. DIGroup’s letter noted that Brink’s “statement is false, misleading and has likely tarnished our firm’s reputation. Please utilize whatever means are available to you to address this directly with Ms. and or Mr. Brink given his position with the UCIA to set the record straight.”

25. The above post also contained false allegations that Ms. Taylor was improperly – and in violation of applicable laws – approving the invoices and contracts associated with a contract that her husband allegedly “lobbied for”.

26. These allegations against Ms. Taylor, and about her work at the UCIA and for the County, throughout Brink’s February 15, 2021 Facebook posts were false and defamatory.

27. Therefore, cease and desist letters were served on Brink, both by Taylor’s personal counsel, and counsel for the UCIA.

28. Immediately after receiving the cease-and-desist letter from Genova Burns – Taylor’s personal counsel – Brink replied that the Facebook posts had been removed the same day.

29. Brink also apologized several times to Ms. Taylor and her family in the email exchange with counsel.

30. Moreover, Brink acknowledged receipt of Counsel's email stating "on the assumption that we are in agreement and that you will cease and desist, my client will refrain from bringing an action per my letter earlier today."

31. Brink acknowledged the inaccuracy and falsity of her statements by both retracting them and noting same in writing.

32. However, several months later, Brink proceeded to again make false and defamatory statements about Ms. Taylor.

C. Brink's Harassment and Defamation Campaign Begins

31. On or about September 10, 2021, Brink's husband, Mark, was notified of his layoff from the County, as part of an economic reduction in force.

32. Two other County employees were also laid off.

33. Unfortunately, this began Brink's vicious campaign to harass, malign and defame not only Ms. Taylor, but Mr. Oatman as well.

34. From September 16, 2021 through November 16, 2022 Brink submitted at least **73** Open Public Record Act ("OPRA") requests to the Union County Board seeking a plethora of information – with a majority directly related to Taylor and/or Oatman.

35. Specifically, Defendant has requested copies of, including but not limited to:

- a. Mr. Oatman and Ms. Taylor's W-2 forms, payroll records, stipend checks and tuition reimbursements;
- b. contracts that the County has entered into with the law firm wherein Taylor's husband is a partner;
- c. invoices from a law firm who represented the UCIA regarding Mark Brink and Carolyn Brink;

- d. an investigative report regarding alleged misconduct against Taylor;
- e. Taylor's calendar of meetings/events from 2016-2021;
- f. all text messages between Taylor and Oatman;
- g. any conflict of interest forms or statements signed by Taylor;
- h. EZ pass records and gasoline and mileage records for Oatman and Taylor;
- i. expense reimbursements related to New Jersey League of Municipalities conference for Oatman and Taylor;
- j. all communications between Oatman and MV Strategies;
- k. information regarding tuition reimbursement for the County – and specifically as to Taylor and Oatman;
- l. information regarding the County's relationship with MV Strategies; and
- m. "any and all expense report receipts and catering invoices for County Manager Edward Oatman and Finance Director Bibi Taylor for dining services at Ristorante da Benito . . . from January 2021 through present."

36. None of the responses to Brink's OPRA requests have revealed any wrongdoing by Taylor or Oatman, and directly contradict the numerous false and defamatory statements and allegations Brink's has been making against them.

37. In what appears to be a personal vendetta to avenge her husband's layoff, Brink also began publishing numerous false and defamatory statements via emails and conversations with various individuals, and in posts and comments on social media, blogs and other websites, all of which are outrageous and completely baseless.

D. Brink's Defamatory Statements

38. On January 31, 2022, Brink sent an email to Richard Nuel at the Office of the State Comptroller ("OSC").

39. In that email Brink claimed that "Oatman is attending an out-of-network college" which is improper because "County policy pamphlet clearly states only Kean and Union County College are approved schools".

40. Therefore, Brink alleged that Oatman was improperly utilizing the tuition reimbursement program and taking funds he is not entitled to.

41. However, Brink failed to acknowledge contradictory information she had received in response to her numerous OPRA requests, including:

- a. the tuition reimbursement policy allows for attendance at other colleges but only reimburses for in-County Kean University's tuition rates;
- b. Oatman himself pays the difference between Kean's tuition rates and the Rutgers' rate; and
- c. several other individuals in the program attend colleges other than Kean University and similarly pay the difference in tuition rates out of pocket.

42. In a second email to Mr. Nuel on or about February 7, 2022, Brink went after Taylor alleging that "Bibi Taylor is the egregious offender as she has the highest cost of reimbursement as she pursues a non-job-related PhD" which Brink further claimed to be "a complete abuse and misuse of taxpayer monies".

43. Brink similarly omitted that other high-level officials are pursuing the same degree as Ms. Taylor, including the Chief of Detectives at the Union County Prosecutor's Office (who is enrolled at Seton Hall University).

44. This was also information Brink received in response to her OPRA requests, therefore, making her aware of the falsity of her statements.

45. On July 1, 2022, Brink transmitted an email to Union County Commissioner Sergio Granados (the “Commissioner”) writing:

In light of today’s final judicial ruling stating Union County acted illegally and inappropriately by not properly bidding the Government Complex project through the UCIA and in accordance to public bidding laws, *it is imperative that the County Commissioners take immediate action to remove and terminate the grossly negligent individuals responsible for this incredible waste of taxpayer money.* As you know well, Ms. Bibi Taylor has profited greatly from this project by way of significant salary increases, UCIA stipends, *questionable campaign contributions and lucrative contracts to her long-time friends.* Enough of this disgraceful conduct and *misuse of our precious government resources.* Ms. Taylor is not a resident or taxpayer of Union County and must be removed immediately from all her duties.

In addition, County Manager Edward Oatman, also not a resident or taxpayer of Union County, has disgraced the Commissioner Board by advising the Dobco lawsuit was nothing but “sour grapes” and the County would “prevail” thus leading the Board to continue having confidence in his leadership. That leadership has now been fully exposed as complete and ignorant incompetence and arrogance.

I urge you to put forward a motion to remove Ms. Taylor and Mr. Oatman immediately from the County of Union as they are not fit to serve the taxpayers or the Commissioners.

(Emphases added).

46. Brink made these allegations to Mr. Nuel and Commissioner Granados to malign, defame and negatively affect Plaintiffs’ reputations.

47. As a result of these false and defamatory statements, the Comptroller’s office requested various documents similar to Brink’s multiple OPRA requests.

48. Moreover, Brink's most recent OPRA requests are indisputably focused on specific information that would confirm the existence of an inquiry by the Comptroller's office to further malign, defame and negatively affect Plaintiffs' reputations.

49. Immediately following these recent OPRA requests, information was provided to the media resulting in news articles concerning a potential Comptroller inquiry.

50. Upon information and belief, Brink was one of the individuals providing information to the media.

E. Brink's Use of Defamation Campaign to Derail Labor Negotiations

51. Brink has also placed telephone calls, and transmitted emails and text messages to officials representing the Communications Workers of America Union ("CWA"), which was in active labor negotiations with Union County.

52. First, Brink contacted CWA President, Colleen Pierce in or about June 2022.

53. During a telephone call with Ms. Pierce, Brink explained who she was and gave her alleged information and details about Taylor, most of which were personal in nature and concerning Taylor's past work experiences.

54. Further, Brink told Ms. Pierce that Taylor was a felon.

55. Brink also said that she would be sending Ms. Pierce emails with articles and information about Taylor's criminal history.

56. Finally, Brink urged Ms. Pierce not to settle the labor negotiations with Union County because of Taylor's criminal conduct.

57. Ms. Pierce received four (4) emails from Brink with articles and information.

58. First, Brink sent an email stating: "Definitely read this story as it sums up Bibi Taylor and how she treats employees very well", which contained three (3) newspaper articles

titled: (1) “Claustrophobic Calls Cramped Quarters Cruel”; (2) “Assembly campaign donations to Union County office expose pay-to-play loophole”; and (3) “Settlement shows Dover paid administrator \$250,000 in severance.”

59. Brink’s second email to Ms. Pierce was a forward of her January 31, 2022 email to Richard Nuel at the OSC, thereby, re-publishing her false and defamatory statements that Oatman is misusing the County’s tuition reimbursement policy.

60. Similarly, Brink’s third email to Ms. Pierce was a forward of her February 7, 2022 email to Mr. Nuel at the OSC, repeating her false and defamatory statements that Taylor is also misusing the County’s tuition reimbursement policy.

61. Finally, Brink’s fourth email to Ms. Pierce stated: “First of several emails I am sending to you are Union County stipends/tuition for Oatman and Taylor. Note, neither had been a resident of Union County.”

62. This final email was a forward of an email Brink had sent to Lisa DaSilva (a former UCIA employee, and current Union County Utilities Authority employee) and her husband, Mark, which included a link to a website called County Watchers – <https://countywatchers.wordpress.com/>.

63. It also included a copy of Brink’s April 29, 2022 OPRA request which requested a detailed statement of salary stipends paid and the employees who received same from January 1, 2022 to present, as well as copies of internal memos and the Memorandum of Agreement between the UCIA and UC for the planning, design and construction of a new Union County Government Complex.

64. During this time, Brink also called other CWA members urging them to hold out on signing the contract with Union County due to Oatman and Taylor's fraud, theft and other criminal conduct, calling them liars and thieves.

65. Brink also told these CWA members that there is an OSC investigation into Taylor and Oatman based on their improper and criminal conduct, including theft.

66. Finally, Brink also told several CWA members that Oatman is getting a divorce because he was caught under the administration building having sex with Taylor.

67. Brink intended to defame and malign Plaintiffs, and simultaneously derail negotiations between union officials and the County with these various statements.

68. All of the above statements – both the written statements in emails to Mr. Nuel, Ms. Pierce, and others (the “Written Defamatory Statements”) and the oral statements to Ms. Pierce, CWA members, and others (the “Oral Defamatory Statements”) are false and defamatory.

F. Brink's Anonymous Defamatory Posts

69. The County Watchers' website has been utilized by Brink to publish numerous posts spreading misinformation, and false defamatory statements regarding both Taylor and Oatman under anonymous or unidentified names.

70. Knowing her allegations against Taylor and Oatman were false, and having removed them after receiving the prior cease and desist letters, Brink knew any continued publications would need to be made “anonymously”.

71. Despite her efforts to keep her posts anonymous, when the name “Brink” is typed into the search function of the County Watchers' website, the result shows a number of posts with comments by people using “anonymous” or unidentifiable names or phrases.

72. As such, it is clear that at least some of the comments in this search result are linked to Brink's account on the website, and are therefore, statements she is knowingly and intentionally publishing.

73. The following are comments by "anonymous" posters linked to Brink's account on County Watchers, based on the above search results.

74. On September 2, 2021, username "JDL" commented on a post titled: "UCCF 9/2/21: Unpacking Some Baggage" with the following:

- a. Ed Oatman and Bibi Taylor must be investigated by authorities immediately for **their corruption and theft of taxpayer money**. They need to be terminated immediately.

(Emphasis added).

75. And subsequently, "JDL" also stated the below to a post titled: "UCCF 9/2/21: Resolutions":

- a. 100% agree with Bruce. Fire Bibi Taylor for incompetence and **corruption**. And fire Ed Oatman for being pompous, arrogant creep. **They are both gross and deserve each other** but Union County does not want or deserve these creepy carpetbaggers.

(Emphasis added).

76. In response to a post titled: "UCIA Brouhaha", "JDL" made the following comment on September 24, 2021:

- a. As we already suspected, Oatman cannot even count to 10. The wife spoke for 6 minutes not 7. Sounds like **Bibi Taylor is a pure and evil bully like her boss...I mean boyfriend ...! mean "boss" Oatman**. We know they are a devil pair, but why are the Commissioners protecting her?

(Emphasis added).

77. On September 28, username "JDL" made the following comments to a post titled "UCIA Story: Looking for Tweaks":

- a. John, we have so many clear and disgraceful facts to present to you about **Bibi Taylor's corrupt leadership** at both the UC and UCIA. Do NOT focus on UCIA employee compensation charts. They do NOT tell **the story of her corruption, laundering and felony theft since she took TOTAL CONTROL of the UCIA in September 2020**. She is a snake and beast. Give us time to lay it all out for you. Your post doesn't even touch the top of the iceberg. She is bad to the bone **and has multiple aliases**. Also, more to come on **her criminal past** (and her husband's for a serious conflict of interest in signing off on legal contracts without signing conflict of interest statements with the Supreme Court of NJ). Hold off until we fill you with so, so much more of this gross misconduct by multiple opportunists and crooks.
- b. Yes, they were all pushed out so Bibi can reign over her fiefdom with no one watching the money but her. \$60,000 came from **a "slush fund" her and Oatman schemed up** to reward themselves for working on the boondoggle Admin Building which **they have already royally screwed up and tainted with no-bids and accepting campaign contributions from her hand-picked contractors to fatten the accounts of her and Scutari**.
- c. **Bibi Taylor/Stewart/Garvin/Edoo Zabedah and her other aliases have been scamming townships and municipalities for decades**.
- d. **Again, I hope she likes the color orange because she's going to be wearing it for years after she is convicted of theft and laundering . . . and racketeering**

(Emphases added).

78. That same day, on a separate post labeled "UCIA Story: Take Two", the user "JDL" also commented:

JB,

Here is the timeline of Bibi Taylor's resolutions to create her fiefdom and remove any and all employees from the UCIA giving her full, unchecked, unaccountable, top secret control of the new Admin Building project. She is a bully and horribly harassed, abused and oppressed the IA staff until she fired every single one of them. **She wants everyone out of the way so she has 100% control of which contractors get hired and how much money she can siphon for herself and her husband's law/lobbying firm**. They are crooks. She is beyond disgraceful. If the Board of Commissioners ever wake

the F up, *they will see her scheme* and finally do something about it by firing her filthy ass but we won't hold our breath as *she is a con artist and has them fooled* (for now.)

69-2020 10/07/20 Union County Project Manager assumes complete control of the UCIA

77-2020 11/04/20 UCIA eliminates the position of Administrative Assistant to the Board of the Authority.

78-2020 11/04/20 UCIA eliminates the position of Clerk to the Board of the Authority.

79-2020 11/04/20 UCIA eliminates the position of Deputy Executive Director/Project Manager.

80-2020 11/04/20 UCIA eliminates the position(s) of Project/Financial Specialist and Project Director.

81-2020 11/04/20 UCIA eliminates the position of Project Specialist.

82-2020 11/04/20 UCIA creates the position of Administrative Analyst.

83-2020 11/04/20 UCIA creates the position of Confidential Assistant.

84-2020 11/04/20 UCIA creates the position of Financial Analyst.

092-2021 09-08-2021 Resolution authorizing a reduction in force

(Emphases added).

79. "WhyIsHeProtectingHer" added a comment to that same post, the next day, on September 29, 2021:

A new building is necessary. The conditions of the social services building are plagued with sewer backups, leaks, mold, and vermin. It is not a luxurious place to work. The poor employees do not deserve to work in those conditions. I am surprised the health department or OSHA have not stepped on or gone after the landlord. The county leases these buildings and can not wait to get out. Something like a 30 or 50 year lease that was legal back then but would never fly now.

The admin building is in better condition than social services but still has a lot of problems especially a big mold problem.

With a new building they can shift people around, bring social services closer together for those who need it. They could also get out of the horrendous leases and use the money from the lease payments to pay the bonds. The County already owns them so no need to purchase land or piss off Bollwage by purchasing land that

would be taken off the tax rolls because it's government property. The Admin building needs to be vacant and striped to be able to do the work properly.

So yes I think a new building is necessary and the plan on its surface make scenes.

It is the inside scam that is criminal and the public needs to wake up and pay attention. We all bitch about Trump and Biden's screw up but look what's happening in our own backyard!

Bibi's f'ed up and delayed the project to the point it's not going to get built now. All due to her own ego, greed, and personal power agenda. This will be tied up in court for years. Prices of material have sky rocketed so that \$145mil is now going to be \$175m. **The money we are wasting in court because she decided to do things her way is criminal, or should be criminal. Bibi Taylor needs to be held accountable for this f'up.** Any other job she'd be fired.

Who makes out? Minchello. Every time he has to bail her out he gets paid. Bibi is his cash-cow and he's laughing all the way to the bank. Of course he's going to say these lawsuits are weak. The longer he allows this to stay in litigation the more he gets paid. OPRA his invoices and chart out his paydays.

John you need to look deeper than the budget and pension records. OPRA all checks, payments, vouchers issued to Bibi Taylor. General ledgers, the whole check registry, position controls, **Remember Bibi is the CFO so she knows how to hide money. It's not going to be in your face. Look how they hid her roll as Project Manager.** Are you expecting transparency with this crew?

How much do the Commissioners know about what's going on? With Hudak as Finance Chair and liaison he knows exactly what is going on. He's too close to Oatman and Scutari and defends Bibi above and beyond anyone else. As far as Mirabella it's no secret he is weak and would never question the leadership risking his cushy roll. Is this why he was chairman for two years? They know he's weak and would to allow for these scam to go on. What about the rest of them? Sergio is only worried about photo ops and focused on becoming Mayor. Kowalski, Mouded, Leone, and Williams are clueless. Garretson is the strongest and most aggressive on the board that's why they won't allow her to be chair. If I were them I would be in Oatman's office demanding to know what is going on. He works for them!

Because we have a Democratic governor with a Democratic AG's office. Nothing is going to happen.

(Emphases added).

80. That same day, the user "UCIACORRUPTION" added the following comment to the same post:

JB, you will indeed be met with silence and/or worse...Oatman's creepy, immature response as he continues to protect his disgraceful management of the County and the IA. He is protecting her and that is what needs full sunshine and answers (but again, you will not get one from this sack of potatoes.) **There is enough evidence of corruption and unethical behavior to terminate and incarcerate Bibi Taylor right now.** ps, did you know neither of them live in Union County and residency requirements were reworded specifically for these two clowns? You cannot make this stuff up. **Corruption all around. Time for the FBI and other law enforcement agencies to raid and handcuff these crooks.**

(Emphases added).

81. On September 29, 2021, a similar post, this time titled "UCIA Story: Take Three" resulted in multiple comments from accounts linked to Brink.

82. First, "JDL" posted:

- a. **After watching their unethical antics over the last year,** the Union County Board of Commissioners officially now work for Edward Oatman and Bibi Taylor.
- b. JB, Bibi Taylor is the ONLY remaining employee at the IA (and yes, her W-2 and pension are from the UC and not the UCIA but she is running the clown show at the IA as the ringmaster and **has siphoned money into her personal bank account via these deceiving slush funds and of course her husband's law firm being granted multiple contracts by the County for CARES ACT and other pandemic and legal related contracts (all completely inappropriate and conflicts of interest on both of their parts.)** Last I checked, this is all very suspicious fiscal activity of public monies and must be investigated by authorities. ps, Bibi Taylor drives a County car that is paid by taxpayers! Absolutely disgusting and she continues to PROFIT

from hardworking residents of a county she does not nor has she ever lived in. Disgraceful.

(Emphasis added).

83. Then on September 30, 2021, “Enufalready” added another comment stating:

Bibs is trying too clean up or cover up the mess from Sullivan and his band of incompetents. She is trying to save face for the Democrats. **Call the FBI forensic accountants.**

(Emphasis added).

84. A few days later, on October 4, 2021, under the post titled, “UC Government Complex Costs” “JDL” commented:

I don’t see this getting built under the current corrupt regime. They are way too dysfunctional and inept. \$7.7M and not one shovel in the ground? Shameful group of bureaucrats.

What about the \$395K slush fund Oatman and Taylor created and kicked her back \$60,000? Add that in JB!

(Emphasis added).

85. On February 15, 2022, in a post titled “Breaking News: Court halts UC Government Complex Project” the following comment was added by “JDL”:

This is an absolute disgrace to Union County taxpayers. **Bibi Taylor (Stewart/Gavin/whoever else *** ***/*****) and Edward Oatman must be held fully accountable and prosecuted for this absolute abuse and mismanagement of taxpayer money.** They should resign immediately but neither lack the integrity or ethics clearly to do so. Disgusting duo and a mockery of the hardworking taxpayers of Union County (neither of whom live here....)

(Emphasis added).

86. On April 7, 2022, another anonymous poster “BYE BYE, BIBI” stated:

Bibi Taylor’s full salary is an outrageous \$317K+ (salary plus UCIA and other stipends) in addition to **her free tuition to pursue an advanced degree in Education at Farleigh Dickenson that has**

nothing to do with her county job (under investigation), a county car, gasoline, pension, healthcare and unlimited expense account not to mention her husband's multiple UC contracts and appointments. **She is the most abusive, overpaid and greedy public employee in County history.** Bibi Taylor has cast a very dark cloud and hostile environment across of Union County. She is toxic and dangerous. It is time for the Board of Commissioners to stop their ignorance and denial and deal with **this corrupt nasty incompetent loser**. She is **COSTING the taxpayers money for her own personal gain**. Time's up, Bibi Stewart Garvin Taylor. Karma is knocking. Can you hear it? We can. Loud and clear.

(Emphases added).

87. On July 1, 2022, Brink's emailed letter to Commissioner Granados was published on the County Watchers' website under the post "Square One for UC Government Complex" (the "Defamatory Letter").

88. This post was then commented on solely by a user named "Dobco Ruling Victory" stating: "I would just add that they should also be banned from the County of Union for eternity".

89. The above numerous posts with false and defamatory statements made by Brink (the "Defamatory Posts") show an indisputable contempt for Oatman and Taylor replete with allegations of criminal conduct including theft, collusion, fraud, laundering, and felony theft, as well as promiscuous behavior via a sexual and/or extramarital affair between Oatman and Taylor – all stemming from the layoff of her husband Mark from his position with the UCIA.

90. Even more egregious, Brink's Defamatory Letter to Commissioner Granados, highlights her significant efforts to not only disparage Oatman and Taylor, but to also negatively affect their employment with Union County affected, and ultimately terminated from same.

91. While initial efforts to have Brink cease and desist from making these various and numerous false and defamatory statements about Taylor and Oatman caused Brink to remove certain comments, it was not permanent.

92. To the contrary, as is evidenced by the foregoing, Brink's campaign and vicious personal vendetta against Taylor and Oatman simply worsened with incessant OPRA requests targeting them specifically and utilized to malign and slander them, outrageous false and defamatory statements about them posted both on social media pages, blogs, emails and stated to many in phone calls and in-person discussions.

93. Brink's false and defamatory oral and written statements have resulted in damage to Plaintiffs' reputation, placing them in a false light, and negatively affecting their employment, including risk of a termination given the gravity of these outrageous allegations.

94. Given these continued attacks, the instant complaint was filed.

FIRST COUNT
(DEFAMATION *PER SE*)

95. Plaintiffs repeat and reallege the allegations set forth in the foregoing paragraphs of this Complaint as if set forth more fully herein.

96. The Defamatory Statements made by various anonymous posters on the County Watchers' website that have posted and/or made comments relevant to this matter, as set forth in Paragraphs 74 to 86 above, were created, and/or are operated, by Brink as the search result on the website for the word "Brink" include each of them.

97. The Defamatory Posts, the Written Defamatory Statements, Oral Defamatory Statements and the Defamatory Letter (collectively, the "Statements") made on the County Watchers' website and other social media, as well as in written and verbal communications to the OSC, Ms. Pierce, numerous CWA members, and others as set forth in detail above, are false and defamatory *per se*, as they allege unlawful, criminal conduct as well as promiscuous behavior of Taylor and Oatman.

98. The Statements were published to a third party or parties without privilege.

99. The Statements were made with reckless disregard of the truth, or with knowledge of the falsity of the statements, as Defendant had knowledge of the falsity of these allegations through the Cease and Desist letters, OPRA requests and responses, as well as publicly available information, yet continued to publish the false and defamatory Statements.

100. Defendant intentionally made the Statements due to her contempt for Plaintiffs which results from her personal vendetta stemming from her husband's layoff as an employee of the County due to economic downsizing.

101. Specifically, the Statements' allegations that Plaintiffs engaged in unlawful and criminal behavior including, among others, committing fraud, corruption, theft, criminal malfeasance, misuse of government funds or monies, laundering, obtaining ill-gotten gains, felony theft, improper acceptance of monies and/or campaign contributions, and possessing multiple aliases to defraud, were so inherently improbable that only a reckless person would have put them into circulation.

102. Moreover, the Statements' allegations that Plaintiffs were engaged in a promiscuous extra-marital sexual relationship were also made without any basis in fact, such that only a reckless person would have put them into circulation.

103. The Statements were meant to harm Plaintiffs' reputations and having the effect of lowering Plaintiffs' standing in the eyes of the Union County community, and/or negatively affecting their office and employment, which could lead to, among other things, termination of same.

WHEREFORE, Plaintiffs demand judgment against Brink on the First Count as follows:

- (a) For a permanent injunction enjoining and restraining Defendant and all persons or organizations who are associated therewith from publishing false and defamatory statements regarding Plaintiffs;
- (b) For compensatory and punitive damages in an amount to be decided at trial;

- (c) For fees and costs, including reasonable attorneys' fees; and
- (d) For such other and further relief as the Court may deem just and equitable.

SECOND COUNT
(LIBEL *PER SE*)

104. Plaintiffs repeat and reallege the allegations set forth in the foregoing paragraphs of this Complaint as if set forth more fully herein.

105. The Defamatory Statements made by various anonymous posters on the County Watchers' website that have posted and/or made comments relevant to this matter, as set forth in Paragraphs 74 to 86 above, were created, and/or are operated, by Brink as the search result on the website for the word "Brink" include each of them.

106. The Defamatory Posts, Written Defamatory Statements, and the Defamatory Letter (the "Defamatory Publications"), published on the County Watchers' website, as well as in written communications to the OSC, Ms. Pierce, numerous CWA members, and others as set forth in detail above, are false and defamatory.

107. The Defamatory Publications were published to a third party or parties without privilege.

108. The Defamatory Publications were made with reckless disregard of the truth, or with knowledge of the falsity of the statements, as Defendant had knowledge of the falsity of these allegations through the Cease and Desist letters, OPRA requests and responses, as well as publicly available information, yet continued to publish the Defamatory Publications.

109. Defendant intentionally made the Defamatory Publications due to her contempt for Plaintiffs which results from her personal vendetta stemming from her husband's layoff as an employee of the County due to economic downsizing.

110. Specifically, the Defamatory Publications' allegations that Plaintiffs engaged in unlawful and criminal behavior including, among others, committing fraud, corruption, theft, criminal malfeasance, misuse of government funds or monies, laundering, obtaining ill-gotten gains, felony theft, improper acceptance of monies and/or campaign contributions, and possessing multiple aliases to defraud, were so inherently improbable that only a reckless person would have put them into circulation.

111. Moreover, the Defamatory Publications' allegations that Plaintiffs were engaged in a promiscuous extra-marital sexual relationship were also made without any basis in fact, such that only a reckless person would have put them into circulation.

112. The Defamatory Publications were meant to harm Plaintiffs' reputations, and having the effect of lowering Plaintiffs' standing in the eyes of the Union County community, negatively affect their office and employment, which could lead to, among other things, termination of same.

WHEREFORE, Plaintiffs demand judgment against Brink on the Second Count as follows:

- (a) For a permanent injunction enjoining and restraining Defendant and all persons or organizations who are associated therewith from publishing false and defamatory statements regarding Plaintiffs;
- (b) For compensatory and punitive damages in an amount to be decided at trial;
- (c) For fees and costs, including reasonable attorneys' fees; and
- (d) For such other and further relief as the Court may deem just and equitable.

THIRD COUNT
(SLANDER *PER SE*)

113. Plaintiffs repeat and reallege the allegations set forth in the foregoing paragraphs of this Complaint as if set forth more fully herein.

114. The Defamatory Statements made by various anonymous posters on the County Watchers' website that have posted and/or made comments relevant to this matter, as set forth in Paragraphs 74 to 86 above, were created, and/or are operated, by Brink as the search result on the website for the word "Brink" include each of them.

115. The Oral Defamatory Statements that Brink published to the OSC, Ms. Pierce, numerous CWA members, and others as set forth in detail above, are false and defamatory.

116. The Oral Defamatory Statements were published to a third party or parties without privilege.

117. The Oral Defamatory Statements were made with reckless disregard of the truth, or with knowledge of the falsity of the statements, as Defendant had knowledge of the falsity of these allegations through the Cease and Desist letters, OPRA requests and responses, as well as publicly available information, yet continued to make the false and defamatory Oral Defamatory Statements.

118. Defendant intentionally made the Oral Defamatory Statements due to her contempt for Plaintiffs which results from her personal vendetta stemming from her husband's layoff as an employee of the County due to economic downsizing.

119. Specifically, the Oral Defamatory Statements' allegations that Plaintiffs engaged in unlawful and criminal behavior including, among others, committing fraud, corruption, theft, criminal malfeasance, misuse of government funds or monies, laundering, obtaining ill-gotten gains, felony theft, improper acceptance of monies and/or campaign contributions, and possessing multiple aliases

to defraud, were so inherently improbable that only a reckless person would have put them into circulation.

120. Moreover, the Oral Defamatory Statements' allegations that Plaintiffs were engaged in a promiscuous extra-marital sexual relationship were also made without any basis in fact, such that only a reckless person would have put them into circulation.

121. The Oral Defamatory Statements were meant to harm Plaintiffs' reputations and having the effect of lowering Plaintiffs' standing in the eyes of the Union County community, negatively affect their office and employment, which could lead to, among other things, termination of same.

WHEREFORE, Plaintiffs demand judgment against Brink on the Third Count as follows:

- (e) For a permanent injunction enjoining and restraining Defendant and all persons or organizations who are associated therewith from publishing false and defamatory statements regarding Plaintiffs;
- (f) For compensatory and punitive damages in an amount to be decided at trial;
- (g) For fees and costs, including reasonable attorneys' fees; and
- (h) For such other and further relief as the Court may deem just and equitable.

FOURTH COUNT
(FALSE LIGHT)

122. Plaintiffs repeat and reallege the allegations set forth in the foregoing paragraphs of this Complaint as if set forth more fully herein.

123. The false and defamatory Statements made by Defendant to numerous individuals, as set forth above, portray Plaintiffs in a false light that would be highly offensive to a reasonable person.

124. Defendant had knowledge of, or reckless disregard as to the falsity of the Statements, and as to the false light in which Plaintiffs have been placed as a result, through the Cease and Desist

letters, OPRA requests and responses, as well as publicly available information, yet continued to publish the false and defamatory Statements.

125. Specifically, the Statements' allegations that Plaintiffs engaged in unlawful and criminal behavior including, among others, committing fraud, corruption, theft, criminal malfeasance, misuse of government funds or monies, laundering, obtaining ill-gotten gains, felony theft, improper acceptance of monies and/or campaign contributions, and possessing multiple aliases to defraud, were so inherently improbable that only a reckless person would have put them into circulation.

126. Moreover, the Statements' allegations that Plaintiffs were engaged in a promiscuous extra-marital sexual relationship were also made without any basis in fact, that only a reckless person would have put them into circulation.

127. The Statements were meant to place Plaintiffs in a false light by harming their reputations and having the effect of lowering Plaintiffs' standing in the eyes of the Union County community, and negatively affect their office and employment, which could lead to, among other things, termination of same.

128. Defendant's publicity of the false and defamatory Statements is the cause of the Plaintiffs' severe and substantial emotional distress and damages to Plaintiffs' reputation.

129. The emotional distress that has been suffered by Plaintiffs as a result of the publication of the Statements, and caused Plaintiffs to be defamed, placed in a false light and diminished their reputations – which could lead to the termination of their employment – is so severe that no reasonable person could be expected to endure such distress.

WHEREFORE, Plaintiffs demand judgment against Brink on the Fourth Count as follows:

- (a) For a permanent injunction enjoining and restraining Defendant and all persons or organizations who are associated therewith from publishing false and defamatory statements regarding Plaintiffs;
- (b) For compensatory and punitive damages in an amount to be decided at trial;
- (c) For fees and costs, including reasonable attorneys' fees; and
- (d) For such other and further relief as the Court may deem just and equitable.

FIFTH COUNT
(INVASION OF PRIVACY)

130. Plaintiffs repeat and reallege the allegations set forth in the foregoing paragraphs of this Complaint as if set forth more fully herein.

131. The false and defamatory Statements made by Defendant gave publicity to allegations regarding Plaintiffs that were private and/or personal and entirely false, and for which Plaintiffs did not provide any permission to publicize.

132. The Statements made by Defendant were an unreasonable intrusion upon the seclusion of Plaintiffs, an unreasonable publicity given to Plaintiffs' private life, and a publicity that normally places another in a false light before the public.

133. Defendant had knowledge, or a reckless disregard as to the falsity, of the Statements and as to the false light in which Plaintiffs have been placed as a result, through the Cease and Desist letters, OPRA requests and responses as well as publicly available information, yet continued to publish the false and defamatory Statements.

134. Indeed, Defendant materially misrepresented Plaintiffs' character, history, activities, and beliefs in a way that a reasonable person in the Plaintiffs' positions would find highly offensive.

135. Defendant's publicity of the false and defamatory Statements is the cause of the Plaintiffs' severe and substantial emotional distress and damages to Plaintiffs' reputation.

136. The emotional distress that has been suffered by Plaintiffs as a result of the publication of the Statements, and caused Plaintiffs to be defamed, placed in a false light and diminished their reputations – which could lead to the termination of their employment – is so severe that no reasonable person could be expected to endure such distress.

WHEREFORE, Plaintiffs demand judgment against Brink on the Fifth Count as follows:

- (a) For a permanent injunction enjoining and restraining Defendant and all persons or organizations who are associated therewith from publishing false and defamatory statements regarding Plaintiffs;
- (b) For compensatory and punitive damages in an amount to be decided at trial;
- (c) For fees and costs, including reasonable attorneys' fees;
- (d) For such other and further relief as the Court may deem just and equitable.

SIXTH COUNT
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)

137. Plaintiffs repeat and reallege the allegations set forth in the foregoing paragraphs of this Complaint as if set forth more fully herein.

138. Defendant intentionally posted and disseminated the false and defamatory Statements to produce emotional distress from Plaintiffs.

139. Defendant had knowledge of, or reckless disregard as to, the falsity of the Statements and as to the false light in which Plaintiffs have been placed, as a result, through the Cease and Desist letters, OPRA requests and responses, as well as publicly available information, yet continued to publish the false and defamatory Statements.

140. Defendant's false and defamatory Statements which materially misrepresented Plaintiffs' character, history, activities, and beliefs are so outrageous in character, and so extreme in

degree as to go beyond all possible bounds of decency and are to be regarded as atrocious and utterly intolerable in a civilized community.

141. Defendant's publicity of the false and defamatory Statements is the cause of the Plaintiffs' severe and substantial emotional distress and damages to Plaintiffs' reputation.

142. The emotional distress that has been suffered by Plaintiffs as a result of the publication of the Statements, and caused Plaintiffs to be defamed, placed in a false light and diminished their reputations – which could lead to the termination of their employment – is so severe that no reasonable person could be expected to endure such distress.

WHEREFORE, Plaintiffs demand judgment against Brink on the Sixth Count as follows:

- (a) For a permanent injunction enjoining and restraining Defendant and all persons or organizations who are associated therewith from publishing false and defamatory statements regarding Plaintiffs;
- (b) For compensatory and punitive damages in an amount to be decided at trial;
- (c) For fees and costs, including reasonable attorneys' fees; and
- (d) For such other and further relief as the Court may deem just and equitable.

JURY DEMAND

Plaintiffs demands a trial by jury on all issues triable.

GENOVA BURNS LLC
Attorneys for Plaintiffs,
Bibi Taylor and Edward T. Oatman

/s/ Angelo J. Genova

ANGELO J. GENOVA

Dated: November 21, 2022

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:5-1(c), Angelo J. Genova, Esq. is hereby designated as trial counsel on behalf of Plaintiffs.

GENOVA BURNS LLC
Attorneys for Plaintiffs,
Bibi Taylor and Edward T. Oatman

/s/ Angelo J. Genova

ANGELO J. GENOVA

Dated: November 21, 2022

CERTIFICATION

I hereby certify pursuant to R. 4:5-1(b) that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding, nor is any other action contemplated. I further certify that there are no other parties who should be joined in the action pursuant to R. 4:28, or who is subject to joinder pursuant to R. 4:29-1(b).

GENOVA BURNS LLC
Attorneys for Plaintiffs,
Bibi Taylor and Edward T. Oatman

/s/ Angelo J. Genova

ANGELO J. GENOVA

Dated: November 21, 2022