



UNION COUNTY PROSECUTOR'S OFFICE

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THEODORE J. ROMANKOW
Prosecutor of Union County

ALBERT CERNADAS, JR.*
First Assistant Prosecutor

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Deputy First Assistant Prosecutor

January 23, 2013

* CERTIFIED CRIMINAL ATTORNEY

Honorable Karen M. Cassidy
Assignment Judge of the Superior Court
Union County Courthouse
Elizabeth, New Jersey 07207

Re: *In re January 11, 2013 Subpoena by Grand Jury of Union County, New Jersey*
Prosecutor's Docket No. 13-0001

Dear Judge Cassidy:

Enclosed please find additional exhibits which the State seeks to rely on in opposition to Ms. Renna's Motion to Quash in the above-referenced matter. Although the State's submitted its brief on January 18, 2012, per the Court's Order, the State respectfully requests that Your Honor accept and consider the attached documents. Because of the accelerated nature of this matter, the State was unable to compile the attached documents in advance of January 18, 2012. The attached exhibits are as follows:

1. Tina Renna's Voter Registration.
2. Tina Renna's Advertising Contract for Advertising Sales for Union County.
3. UCWA's campaign donation to political group "Continuing the Progress."
4. Republican Committee Donation to Union County Watchdog Association.
5. Republican Committee Donation to Tina Renna and Joseph Renna.
6. News article regarding Joseph and Tina Renna.
7. Union County Employment Card for Joseph Renna.
8. 2003 & 2004 Freeholder Election Results.
9. Deposition of Tina Renna, dated March 3, 2008.

The State submits these documents further support it's contention that Ms. Renna is a political activist whose motive is to retaliate against the political group that she feels treated her and her husband inappropriately. Ms. Renna certainly has the First-Amendment right to harshly criticize government for *any* reason. However, she cannot legitimately claim Newsperson's Privilege under the guise of "investigative" reporting when her blog (and her public commentary) consists of one-

Honorable Karen M. Cassidy, A.J.S.C.

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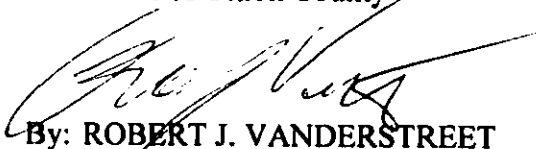
January 23, 2013

sided attacks on her political adversaries. The State would specifically refer the Court to pages 20, 31, 74, 90-93, 98 and 103 of Ms. Renna's deposition which further illustrate the purpose of the blog as venue for political opinion and not factual reporting.

Respectfully submitted,

THEODORE J. ROMANKOW

Prosecutor of Union County

A handwritten signature in black ink, appearing to read "R. J. Vanderstreet", is written over the typed name of the signatory.

By: ROBERT J. VANDERSTREET

Assistant Prosecutor

cab

c Bruce Rosen, Esq.

CHANGE OF ADDRESS

PERMANENT REGISTRATION

1244529

1244529 EL 06 04 11/17/93
 RENNA, TINA MARIE
 534 FOURTH AV
 ELIZABETH N. J. 07202

Name: Last name, First name in full, Middle Initial Only
 PREVIOUS: 1244529 EL 06 09
 RENNA, TINA MARIE
 22 JOHN ST
 ELIZABETH N. J. 07202

1244529 003/006/001
 TINA MARIE RENNA
 202 BEAUFORT AV
 CHATELAIN, NJ 07016-2931

Exact Location: Apt. No. Room No. Floor No.
 Use only for Three or more Family Homes, Apartments, Hotels, Townships or Institutions

To Municipality: _____ Ward: _____ District: _____ Date: _____

To Municipality: _____ Ward: _____ District: _____ Date: _____

To Municipality: _____ Ward: _____ District: _____ Date: _____

To Municipality: _____ Ward: _____ District: _____ Date: _____

To Municipality: _____ Ward: _____ District: _____ Date: _____

To Municipality: _____ Ward: _____ District: _____ Date: _____

To Municipality: _____ Ward: _____ District: _____ Date: _____

To Municipality: _____ Ward: _____ District: _____ Date: _____

1 **RENNA** Tina Marie
 22 John St
 Elizabeth 07202 355-5553

3 **RENNA** Tina Marie
 4 11/17/92

5 **RENNA** Tina Marie
 334 Christie St
 Elizabeth NJ 07202

7 **RENNA** Tina Marie
 1/18/92

8 **RENNA** Tina Marie
 22 John Elizabeth 07202

ORIGINAL VOTING RECORD

Year	Primary Election		General Election Ballot No.	Other Election Ballot No.
	Political Party	Ballot No.		
1988				
1989				
1990				
1991				
1992			309	
1993			VOTED	
1994			VOTED	
1995			VOTED	
1996			VOTED	
1997			VOTED	
1998			126	91
1999			105	
2000	Dem	voted	319	
2001			186	
2002			voted	030
2003	Dem	voted	voted	voted
2004	REP	voted	voted	voted
2005	Rep	voted		voted
2006				
2007				
2008				
2009				
2010				
2011				
2012				

TINA RENNA
202 Walnut Ave., Cranford, NJ 07016
Tel. 908.709.0530.....Fax. 908.709.9209

Contract

The Union County Alliance (UCA) agrees to hire Tina Renna as an independent sales person to sell advertising for UCA's Newsletter, Union County Directions. This contract is for the premier issue only. Compensation for ad sales is 15% of gross sales.



Tina Renna



Union County Alliance
Ann-Marie Kay
Executive Vice President

FORM R-1		REPORT OF CONTRIBUTIONS AND EXPENDITURES		REPORT (CHECK ONE)	
NEW JERSEY ELECTION LAW ENFORCEMENT COMMISSION P O Box 185, Trenton, NJ 08625-0185 (609) 292-8700 or Toll Free Within NJ 1-888-313-ELEC (3532) Web site http://www.elec.state.nj.us/				<input checked="" type="checkbox"/> 29 - DAY PRE-ELECTION <input type="checkbox"/> 11 - DAY PRE-ELECTION <input type="checkbox"/> 20 - DAY POST-ELECTION <input type="checkbox"/> Apr 15, _____ <input type="checkbox"/> July 15, _____ <input type="checkbox"/> Oct 15, _____ <input type="checkbox"/> Jan 15, _____	
CANDIDATE OR COMMITTEE NAME <i>CONTINUE THE PROGRESS</i>				Amendment Yes <input type="checkbox"/> No <input type="checkbox"/>	
STREET ADDRESS <i>1324 NORTH AVE</i>				For State Use Only	
CITY <i>ELIZABETH</i>	STATE <i>NJ</i>	ZIP CODE <i>07208</i>		ELEC RECEIVED MAR 26 2010	
COUNTY <i>UNION</i>	ELECTION DISTRICT OR MUNICIPALITY <i>ELIZABETH</i>				
POLITICAL PARTY, IF ANY <i>NON PARTISAN</i>	OFFICE SOUGHT <i>SCHOOL BOARD</i>				
ELECTION DATE <i>APRIL 20, 2010</i>	ELECTION TYPE (CHECK ONE)	<input type="checkbox"/> PRIMARY	<input type="checkbox"/> MUNICIPAL	<input type="checkbox"/> GENERAL	
		<input type="checkbox"/> RUN-OFF	<input checked="" type="checkbox"/> SCHOOL	<input type="checkbox"/> SPECIAL	
SUMMARY TABLES DO NOT ATTEMPT TO COMPLETE TABLES I AND II UNTIL APPROPRIATE SCHEDULES HAVE BEEN COMPLETED					
TABLE I RECEIPTS		THIS REPORT	CUMULATIVE TO DATE		
1 MONETARY CONTRIBUTIONS OF \$300 OR LESS		\$ 80,102.50	\$ 80,102.50		
2 MONETARY CONTRIBUTIONS IN EXCESS OF \$300 AND ALL CURRENCY CONTRIBUTIONS [Schedule A]		\$ 20,130 -	\$ 20,130 -		
3 IN-KIND CONTRIBUTIONS OF \$300 OR LESS		\$ - 0 -	\$ - 0 -		
4 IN-KIND CONTRIBUTIONS IN EXCESS OF \$300 [Schedule B]		\$ - 0 -	\$ - 0 -		
5 LOANS RECEIVED IN EXCESS OF \$300 AND ALL CURRENCY LOANS [Schedule C]		\$ - 0 -	\$ - 0 -		
6 SUB TOTAL (ADD LINES 1 THRU 5)		\$ 100,232.50	\$ 100,232.50		
7 REFUND OF EXCESSIVE CONTRIBUTIONS [Adjustment Schedule] (-)		\$ - 0 -	\$ - 0 -		
8 TOTAL CONTRIBUTIONS		\$ 100,232.50	\$ 100,232.50		
9 ADD FUNDS TRANSFERRED FROM PRIOR CAMPAIGN (+)		\$ - 0 -	\$ - 0 -		
10 TOTAL RECEIPTS (ADD LINE 8 + LINE 9)		\$ 100,232.50	\$ 100,232.50		
TABLE II EXPENDITURES					
1 DISBURSEMENTS -CAMPAIGN EXPENSES [Schedule 1(D)]		\$ 16,999.31	\$ 16,999.31		
2 DISBURSEMENTS - OTHER [Schedule 2(D)]		\$ - 0 -	\$ - 0 -		
3 DISBURSEMENTS - CONTRIBUTIONS MADE TO OTHER CANDIDATES/COMMITTEES [Schedule 3(D)]		\$ - 0 -	\$ - 0 -		
4 CONTRIBUTIONS MADE ON BEHALF OF OTHERS [Pro Rata Amount Schedules 1(D) and 2(D)]		\$ - 0 -	\$ - 0 -		
5 IN-KIND CONTRIBUTIONS OF \$300 OR LESS (TABLE I, LINE 3)		\$ - 0 -	\$ - 0 -		
6 IN-KIND CONTRIBUTIONS IN EXCESS OF \$300 (TABLE I, LINE 4)		\$ - 0 -	\$ - 0 -		
7 SUB TOTAL (ADD LINES 1 THRU 6)		\$ 16,999.31	\$ 16,999.31		
8 REFUNDED DISBURSEMENTS [Schedule F] (-)		\$ - 0 -	\$ - 0 -		
9 TOTAL EXPENDITURES (LINE 7 MINUS LINE 8)		\$ 16,999.31	\$ 16,999.31		