

John L. Shahdanian II, Esq.
jshahdanian@tisslaw.com
973.533.1000
Reply to Hackensack office

October 26, 2026

Via Email and Certified Mail, Return Receipt Requested

Omar Rodriguez
275 Madison Avenue
Saddle Brook, NJ 07663
Email: Omar2020original@gmail.com

Andrew Dziedzic
374 President Street
Saddle Brook, NJ 07663
Email: andrewdziedzic25@gmail.com

Re: CEASE AND DESIST Warning

Dear Mr. Rodriguez and Mr. Dziedzic:

This office represents Robert White, Mayor of the Township of Saddle Brook. This letter is a CEASE AND DESIST warning that certain statements you have recently made and published in campaign materials, by email, and on social media are false, defamatory, and made with actual malice, and may subject each of you to legal action.

In campaign mailers circulated to Saddle Brook residents under both of your names, captioned "Mayor White has been caught!" and signed "Respectfully yours, Omar Rodriguez for Mayor, Andrew Dziedzic for Council," you accused Mayor White, directly and by implication, of paying an individual to remove and destroy your lawn signs. You quoted an unidentified man as stating, "I was paid by the Mayor, and I'm real sorry," and you went on to tell voters that "the highest elected official in Saddle Brook (your Mayor) paid someone to take down his opponents' signs." You further announced that you had never heard of another candidate "PAYING SOMEONE TO DO IT!" The same accusation has been circulated online in a video titled "Mayor Paid Me," which has been shared as a link and viewed hundreds of times.

These allegations are false. Mayor White did not pay, ask, encourage, or authorize anyone to remove, damage, or destroy your campaign signs or anyone else's. He has no knowledge of, and no relationship with, the individual depicted in the video. The tampering with or destruction of campaign signs is unlawful conduct, and accusing a sitting public

official of paying someone to commit it is an accusation of criminal and official misconduct. It is defamatory on its face.

Your mailers make no attempt to verify the statement of the person in the video, to identify him, or to explain who recorded him or under what circumstances. You hedged your own accusation with the phrase “if what he says is true,” which demonstrates that you knew you had no basis to believe it, yet you published it to every household in Saddle Brook anyway and then repeated it as fact. Publishing an accusation of criminal conduct while entertaining serious doubts as to its truth is the very definition of reckless disregard for the truth, and it constitutes actual malice.

Your mailers also compound the falsehood with further statements designed to suggest a pattern of misconduct, including that Mayor White has been “caught” “[n]ot once, not twice, but more than three times,” and that he has been caught “with [his] pants down – AGAIN!” There is no factual basis for the assertion that Mayor White has been “caught” in wrongdoing “more than three times.” These statements are calculated to convey to voters that the Mayor is a serial lawbreaker and are equally false and defamatory.

Whatever your views of Mayor White’s record, you have taken legitimate political debate and transformed it into a defamatory attack on a public servant who has served this community for twelve years and who has worked hard to earn a positive reputation in his public and private life. Your statements were deliberately timed to reach voters immediately before the November 3rd election, when Mayor White has the least opportunity to respond, and they have been republished and shared, causing further damage. By making and publishing these statements, each of you has committed several torts against Mayor White, including defamation (libel), false light invasion of privacy, and tortious interference with prospective economic advantage.

Mayor White reserves all rights, including proceeding to file a lawsuit against each of you in the Superior Court of New Jersey without further warning, and referring this matter to the appropriate authorities. Pending any potential action, it is imperative that you do not tamper with, delete, or destroy any computer, cellphone, social media account, video recording, email, text message, or paper files or documents you may have related to your mailers, the video, the individual depicted in the video, or your statements concerning Mayor White. This includes the original, unedited recording of the video and all communications with the individual depicted in it or with the person who recorded it.

MAYOR WHITE THEREFORE DEMANDS THAT YOU IMMEDIATELY CEASE AND DESIST FROM MAKING FURTHER SUCH DEFAMATORY STATEMENTS, WHETHER IN PRINT, BY EMAIL, ON SOCIAL MEDIA, OR OTHERWISE; THAT YOU IMMEDIATELY STOP DISTRIBUTING ANY MAILER OR OTHER MATERIAL CONTAINING THEM; AND THAT YOU TAKE DOWN FROM SOCIAL MEDIA AND ANY WEBSITE THE SPECIFIC STATEMENTS ACCUSING OR SUGGESTING THAT HE PAID ANYONE TO REMOVE CAMPAIGN SIGNS OR OTHERWISE ENGAGED IN CRIMINAL OR INAPPROPRIATE ACTIVITY.

PLEASE BE GUIDED ACCORDINGLY.

TRENK ISABEL SIDDIQI & SHAHDANIAN, PC

A handwritten signature in black ink, appearing to read "John L. Shahdanian II". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

John L. Shahdanian II, Esq.

JLS/rj

cc: Hon. Robert White (via email)