



Donald H. Hadley, LLC

Legal Services/Business Counsel

215 Harrison Street • Rockville, Maryland 20850
301-838-1995 • Fax 301-838-1996 • don@hadleylaw.com

November 2, 2015

Ms. Sima Osdoby

By email to: info@simaworksforrockville.com
osdobykatz@verizon.net

Mr. David Lublin

By email to: Lublin.david@gmail.com

Dear Ms. Osdoby and Mr. Lublin,

I write to put you on notice that your allegations of an unethical business arrangement between Mr. Fred Newton, Mayor Bridget Newton and myself are grossly, recklessly and intentionally false, to wit (*inter alia*):

1. I am not and never have been a business partner with Mr. Newton or Mayor Newton, directly or indirectly, in any project or enterprise.
2. Mayor Marcuccio, not Bridget Newton, recruited me for the Planning Commission when I was appointed five (5) years ago.
3. Neither Mr. Newton nor I initiated or participated in any manner in the historic review of the property as you allege.
4. Mr. Newton's purchase or use of the property that you claim involved favoritism did not involve any land use review, action or approval by the City which could have been influenced in any way by Mr. Newton's wife as a Councilmember, by the Planning Commission or by me.
5. Your false allegations in no way were verified at the King Farm debate in which Ms. Osdoby's remarks were roundly booed (a debate first) and Ms. Osdoby concluded that "Don Hadley is a good man."

If you and your informants had performed the least bit of due diligence on the facts (including a phone call to me which I gladly would have obliged), you would have learned, *inter alia*, that I was nominated and appointed to the Planning Commission by Mayor Phyllis Marcuccio in late 2010 (not by Mayor Newton or within her term as Mayor), my application to serve on the Planning Commission was inspired by neighbors (not in any way by Mr. Newton or Ms. Newton), my relationship to Mr. Newton's transaction was that I served in my long-standing law practice as an arms-

H

Ms. Sima Osdoby
Mr. David Lublin
November 2, 2015
Page 2 of 2

length settlement attorney for the transaction, I am not in business with Mr. Newton in any way, the seller conducted the historic designation process prior to Mr. Newton becoming interested in the property, and your description of my relationship with the Newtons as a "close family friend" is misleading overstatement.

All of this is done by you on election eve for the cynical purpose of immediate political and personal gain.

I advise you that it is likely that I will incur loss of business and reputation, in my law practice and personally, as a result of your widely dispersed ill-founded statements. I already am receiving calls which, if nothing else, are an interruption of my work at a very busy time. I advise you to immediately retract your statements and take all mitigation steps in your power to avoid or reduce the anticipated damages. I will look to you and those participating with you for damages incurred. Kindly acknowledge receipt of this letter.

Yours truly,


Donald H. Hadley

ecc: Members of The Slate
Max Van Balgoy, Campaign Manger
Rockville Board of Supervisor of Elections
Rockville Ethics Commission
Sentinel Newspapers