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September 23, 2009

Steve Young, President  
National Action Network  
South Jersey Chapter  
PO Box 1943  
Atlantic City, NJ 08404

**Re: Atlantic City Fireman, Thomas Flanagan, III**

Dear Mr. Young:

Our firm represents Thomas Flanagan, III with regard to statements you have made in public, pertaining to his alleged involvement in an incident which occurred on May 16, 2009, at the Atlantic City Firehouse, Station 2.

In that regard, you have repeatedly indicated on the Harry Hurley Show and during last week's City Council meeting that Thomas Flanagan, III was "accused" of being involved in some inappropriate conduct with some minor females. I believe it is important to advise you, that Thomas Flanagan, III is a young Atlantic City firefighter whom has only been on the job less than two years. More importantly, Mr. Flanagan was not working at Station 2 on the evening in question and, significantly, has worked at Station 4 from January 2009 through July 2009. It is important that you also be aware Mr. Flanagan served time in the Persian Gulf, is a decorated war veteran and an upstanding member of the community.

The fact that you have repeatedly suggested Mr. Flanagan was involved in the incident which occurred at Station 2 has caused Mr. Flanagan and his entire family a great deal of stress, embarrassment and duress. More importantly, Mr. Flanagan believes that you have created an unsafe environment for him at his workplace. As you know, notwithstanding the fact that Thomas Flanagan, III had absolutely no involvement in any incident on May 16, 2009, your consistent accusations have caused other individuals to believe that he was in fact involved. You have allowed your false accusation to be replicated over and over again on Comcast, Channel 2.

The purpose of this correspondence is to respectfully request that you immediately retract your allegations against Mr. Flanagan. The allegations made against our client are not true, and in fact they are, in our opinion, defamatory.

We are unaware whether or not our client has suffered any damages as a result of the defamatory allegations. If, however, our client is damaged in any manner whatsoever, we will be actively seeking recovery.

Again, I am asking that you publicly set the record straight with regard to Thomas Flanagan's lack of involvement in the May 16, 2009 Station 2 incident. I am also asking that you publicly apologize for incorrectly and knowingly exposing him as an "accused". Finally, I am asking that you produce the source that you relied on which suggested that he was an "accused".

By copy of this correspondence, I am demanding that Chanel 2, Comcast immediately **cease and desist** from airing the Council meeting in which Mr. Young declares Thomas Flanagan, III as an "accused". Additionally, I am asking Harry Hurley to publicly announce that Thomas Flanagan, III was mistakenly and inappropriately referenced as an "accused" on his show by Mr. Young.

I look forward to hearing from you. I thank you for your cooperation

Very truly yours,

STEVEN P. SCHEFFLER

SPS/cmw

Cc: Thomas Flanagan, III  
Mayor Lorenzo Langford  
Atlantic City, City Council  
Steven Moore, City Council  
Robert Tarver, City Solicitor  
Harry Hurley  
Comcast, Channel 2