

**Lawrence M. Pearson**

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July 2, 2020

**VIA E-MAIL**

**CEASE AND DESIST LETTER**

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Metro Corporate Campus One

P.O. Box 5600

Woodbridge, NJ 07095

**Re: Blueprint Capital Advisors, LLC v. State of New Jersey, Dept. of Treasury, et al.; No. 20-cv-07663**

Dear John:

As you know, we represent Blueprint Capital Advisors (“Blueprint” or the “Company”) in connection with the above-referenced matter. It has come to our attention that senior officials with New Jersey’s Division of Investments (the “DOI”), including DOI Director Corey Amon, have been contacting Blueprint’s other investors for the purpose of tortiously interfering with the Company’s business relationships. From conversations with relevant parties, we are aware that DOI employees have contacted the New England Pension Consultants and the Chicago Police Pension Fund (“Chicago Police”) in a transparent and retaliatory attempt to have Chicago Police pull out of its investment with Blueprint. This, in turn, could be used to provide the DOI with a pretext or cover to withdraw its investments from Blueprint as well, effectively crippling the Company.

The conduct of the DOI and its representatives (including, but not limited to, Mr. Amon) is unlawful and inexcusable, and they must cease and desist from these and similar actions immediately. Even as things stand, this conduct will be added to the allegations and causes of action (tortious interference, retaliation under Section 1983 and/or 1981, defamation, etc.) in the Complaint in the current litigation. Any further unlawful conduct with regard to Chicago Police or other clients, prospective clients, or business partners of Blueprint will also be added to the current lawsuit and Blueprint will pursue its claims and seek relief to the fullest extent permitted under law.

Indeed, this conduct further reveals the retaliatory and discriminatory animus of the DOI and its officials against Blueprint, and will be the subject of discovery in the pending litigation. This new tortious and defamatory conduct also illustrates and proves the true, illicit motivation behind the recent, supposed due diligence that DOI and its consultant sought from the Company (including the identity of all of its clients—a particularly intrusive and curious request), which was an attempt to

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ATTORNEYS AND COUNSELORS AT LAW

harm Blueprint and its business relationships due to its pursuit of legal claims against DOI, including racial discrimination towards Blueprint.

If DOI and its officials are somehow still ignorant (which is no excuse or defense) of the fact that Blueprint's assertion of legal claims and the filing of its lawsuit are legally protected against retaliation by the Defendants, then this letter is their written notice that they must stop such conduct right now. We trust that you will promptly share this letter with your clients and direct them, including Mr. Amon, to immediately cease and desist from this behavior. If such harassing, tortious, and retaliatory conduct against Blueprint does not cease immediately, the Company will consider further legal action, including, but not limited to, the seeking of injunctive relief, without further notice.

Sincerely,



Lawrence M. Pearson

cc: Eben P. Colby, Esq. (via e-mail – [eben.colby@skadden.com](mailto:eben.colby@skadden.com))  
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