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January 26, 2021

Stephanie Pizzulo
Land Use Administrator
Andover Township Municipal Building
134 Newton Sparta Road
Newton, NJ 07860
(sent via fax 973-383-9977)

Re: Richard Jump
310 Stickles Pond Road
Block: 151, Lot: 19

Dear Ms. Pizzulo:

I have reviewed this matter with Mr. Jump, and we are not in agreement with the procedure to handle this hearing virtually. Mr. Jump resides in Arizona and under the present pandemic conditions is not able to drive across the country in compliance with all of the quarantine restrictions along the way. Mr. Jump does not fly.

The virtual hearing format unduly restricts the right to be represented by legal counsel and to have the effective representation of counsel. Mr. Jump and I will not be able to consult and confer during a virtual hearing as would be the case with an in-person hearing in the Municipal Building.

Moreover, the ability to assess credibility of witnesses by facial expressions, body language, tone of voice, and other such intangible aspects of the process are functionally nonexistent in a virtual proceeding.

Consequently, we are respectfully requesting that this matter be rescheduled at a time when the pandemic restrictions have eased so that the customary in-person hearings are able to resume.

I would point out that this is not a situation where an ongoing violation is occurring causing danger or distress to the neighborhood. The site has been cleaned up, showing that Mr. Jump is acting as a good neighbor.

Please confirm that this matter will not proceed virtually on February 2, 2021.

Yours truly,

GARY A. KRAEMER

GAK/bb

Cc: Richard Jump