

UNITED STATES DISTRICT COURT

9th for the
District of New Jersey
Civil Division

Case No. _____

(to be filled in by the Clerk's Office)

Christopher & Piper Pear Angulo, Dylan R. Remensnyder
Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Colin Grant, Christian & Adam Lacicero, Elizabeth Boettger
Lacicero, Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS (Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Chris Angulo aka Christopher Angulo
 Address Minor children also plaintiffs
426 Penn Ave
Forked River NJ 08731
City State Zip Code
 County Dylan Remensnyder Piper Pear Angulo
 Telephone Number 925 489 8673
 E-Mail Address chris-angulo@aol.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this cc nplaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name Colin Grant
 Job or Title (if known) Chief of Police, Lavallette
 Address Grand Central Ave
Lavallette NJ 08735
City State Zip Code
 County Ocean
 Telephone Number 732 793 4800
 E-Mail Address (if known)

☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name Adam Lacicero
 Job or Title (if known) Sgt., Lavallette Police Dept.
 Address Grand Central Ave
Lavallette NJ 08735
City State Zip Code
 County Ocean
 Telephone Number 732 793 4800
 E-Mail Address (if known)

☒ Individual capacity ☒ Official capacity

Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Christian Lacicero

Sgt., Lavallette Police Dept.

Grand Central Ave

Lavallette

City

NJ

State

08735

Zip Code

Ocean

732 793 4800



Individual capacity



Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Beth Boettger

Court Clerk, Court Administrator

Grand Central Ave

Lavallette

City

NJ

State

08735

Zip Code

Ocean

732 830 1911



Individual capacity



Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Intentional Infliction of Emotional Distress - (and physical), Defamation, Deprivation of Rights, malicious prosecution of disabled child, False imprisonment, Excessive Force, Harassment, False Report

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Beth Boettger, The Court administrator attempted to state I was arrested on a warrant and actually fabricated a warrant. I was arrested in-person and on the spot. I was NOT supposed to be transported to jail for simple trespassing.

III. Statement of Claim

The two brothers, who would NEVER be Sgts. (or officers) without their father as mayor, acted illegally. State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Lavallette Borough Hall, Lavallette Police Car/Police Station, OC Jail.

- B. What date and approximate time did the events giving rise to your claim(s) occur?

April 1, 2022 ~ 6 AM

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

2. The jail could not take me until they wrote up a fake warrant.

1. Police and prosecutors office are hiding the abusive body cam footage.

Adam Lacicero completely ignored me and lured me past a brand new sign, in the dark, while I was video recording AND violently, aggressively charged at me and physically assaulted me again for no lawful reason. Christian Lacicero said, "Don't bring him to PESS, he gets out of PESS, bring him to jail." So the two brothers, Adam and Christian Lacicero, brought me to jail, for no lawful reason, on a day when I had a FRO trial in Monmouth County Superior Court. Beth Boettger tried to justify

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Having a Final Restraining Order issued in my absence, while fighting to see my child for 3 years and getting ever-more-desperate, is indeed an injury. It is a huge setback and hindrance to my life. Every unlawful arrest or incarceration sets me back. Being verbally abused on the ride to jail ^{months and years in family court} and scared for my life (since Colin killed bebre) ^{caused harm}. Going hours without food and water, and being assaulted, detained verbally abused, etc. has hurt my psyche and soul. Feelings of helplessness as the mayor and his children completely ruin my life. Having to post \$500 has annoyed my girlfriend and she wants the money back.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Punitive Damages for allowing these ^{rogue, violent} police officers to conspire, lie, assault, fabricate reports, verbally abuse, make tons of money, retire with pensions, keep me in fear, scare my children and ex-girlfriends, charge me with ridiculous crimes, force me out of town, tell me erroneously where I was born, call the PESE/PESS unit to take me hostage, destroying evidence, assaulting me causing permanent injuries to my hands (9.11.21 arrest, and town meeting ^{arrest})... and more!

Demanding Punitive Damages from this 4/1/22 unlawful arrest, drive, verbal abuse, conspiracy NO LESS THAN \$500,000. Colin Grant allowed and enabled these officers to continue to brutalize me and place me in fear by

Asking the Court to prevent Colin Grant from HIDING BODY CAM footage

Demanding all footage be restored and made public especially the arrest at the Lavallette TOWN MEETING

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

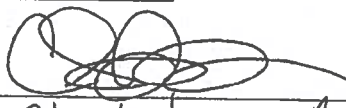
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

6/29/22

Signature of Plaintiff

Printed Name of Plaintiff


Christopher Angulo

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address