

BRADLEY D. BILLHIMER
Ocean County Prosecutor

ANTHONY U. CARRINGTON
Chief of Detectives



MICHAEL T. NOLAN, JR.
First Assistant Prosecutor

MICHELLE ARMSTRONG
Deputy First Assistant Prosecutor

OFFICE OF THE PROSECUTOR

119 Hooper Avenue
P.O. Box 2191
Toms River, New Jersey 08754-2191
732-929-2027
www.OCPONJ.gov

September 3, 2024

Sean Nelson Boero

Via OPRA Machine: opra+request-65571-52bba5b8@requests.opramachine.com

Re: Open Public Records Act (OPRA) Request
Re: Douglas Bollinger

Dear Mr. Boero:

Enclosed please find the Complaint Warrant, Affidavit of Probable Cause, Preliminary Law Enforcement Incident report and Appendix A pursuant to your request made under the New Jersey Open Public Records Act (OPRA). Personal identifying information has been redacted pursuant to N.J.S.A. 47:1A-1.1, et seq.

As of this date, please be advised that there are no responsive documents pursuant to your request for the arrest report.

If I can be of further assistance, please do not hesitate to contact me.

Yours very truly,
Dina R. Khajezadeh
Dina R. Khajezadeh
Assistant Prosecutor

DRK/ec

Enclosures

COMPLAINT - WARRANT

COMPLAINT NUMBER

1525**W****2024****000185**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

POINT PLEASANT BEACH MUN CT
416 NEW JERSEY AVE
POINT PLEASANT BCH NJ 08742-0000
732-892-1118 COUNTY OF: OCEAN

of CHARGES 2 CO-DEFTS POLICE CASE #
22-0900666

COMPLAINANT DET. N TESTA
NAME: 119 HOOPER AVE

TOMS RIVER NJ 08754

THE STATE OF NEW JERSEY**VS.****DOUGLAS J BOLLINGER**

ADDRESS: 934 1-2 4TH AVENUE

NEPTUNE CITY**NJ 07753-0000****DEFENDANT INFORMATION**

SEX: M EYE COLOR: HAZEL DOB: [REDACTED] 1967
DRIVER'S LIC. # [REDACTED] DL STATE: NJ
SOCIAL SECURITY # [REDACTED] SBI #: [REDACTED]
TELEPHONE # [REDACTED] (C)
LIVSCAN PCN# [REDACTED]

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 07/01/2019 in POINT PLEASANT BEACH, OCEAN County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY ENGAGE IN SEXUAL CONDUCT WITH VICTIM [REDACTED] WHICH WOULD IMPAIR OR DEBAUCH THE MORALS OF THE VICTIM, WHILE HAVING ASSUMED RESPONSIBILITY FOR THE CARE OF THE VICTIM, BETWEEN THE MONTHS OF JUNE AND AUGUST 2019, WHILE THE VICTIM WAS A STUDENT OF THE DEFENDANT'S, MORE SPECIFICALLY BY TOUCHING THE VICTIM'S BREASTS AND VAGINA UNDER HER CLOTHING, PURSUANT TO N.J.S.A. 2C:24-4A(1), A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY ENGAGE IN SEXUAL CONTACT WITH VICTIM [REDACTED] WHILE THE ACTOR HAD SUPERVISORY OR DISCIPLINARY POWER OVER THE VICTIM BY VIRTUE OF THE ACTOR'S LEGAL, PROFESSIONAL, OR OCCUPATIONAL STATUS, BETWEEN THE MONTHS OF JUNE AND AUGUST, 2019, WHILE THE VICTIM WAS A STUDENT OF THE DEFENDANT'S, MORE SPECIFICALLY, BY TOUCHING THE VICTIM'S BREASTS AND VAGINA UNDER HER CLOTHING, PURSUANT TO N.J.S.A. 2C:14-3(B), in violation of:

Original Charge	1) 2C:24-4A(1)	2) 2C:14-3B	3)
Amended Charge			

CERTIFICATION: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: DET. N TESTA

Date: 08/12/2024

You will be notified of your Central First Appearance/CJP date to be held at the Superior Court in the county of OCEAN at the following address: OCEAN SUPERIOR COURT

120 HOOPER AVE

Date of Arrest:

Appearance Date:

Time:

TOMS RIVER

NJ 08753-0000

Phone: 732-504-0700

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator

Date

Signature of Judge

Date

☒ Probable cause IS found for the issuance of this complaint. TRACEY MCCRYSTAL JUDICIAL OFFICER 08/12/2024

Signature and Title of Judicial Officer Issuing Warrant

Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: by:

(if different from judicial officer that issued warrant)

☐ Domestic Violence - Confidential

☐ Related Traffic Tickets or Other Complaints

☐ Serious Personal Injury/ Death Involved

Special conditions of release:

- ☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify):

ORIGINAL

COMPLAINT - WARRANT

COMPLAINT NUMBER				STATE V. DOUGLAS J BOLLINGER
1525	W	2024	000185	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	

A CRIME OF THE FOURTH DEGREE.

Original Charge			
Amended Charge			

COMPLAINT – WARRANT (Court Action)

COMPLAINT NUMBER

1525**W****2024****000185**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

STATE V.**DOUGLAS J BOLLINGER****FTA Bail Information**

Date Bail Set:

Amount Bail Set: \$

by

☐ Bail Recog. AttachedReleased
on Bail
(v)

R.O.R.

Committed
DefaultCommitted
w/o Bail

Place Committed:

Date Referred to

County Prosecutor:

Date of First
Appearance:☐ Advised of Rights by

Defendant Desires Counsel:

☐ Yes ☐ No**Prosecuting Attorney Information****Defense Counsel Information**

Name:

Name:

State

County

Municipal

Other

None

Retained

Public Def

Assigned

Waived

Other

Original Charge

1) 2C:24-4A(1)

2) 2C:14-3B

3)

Amended Charge

Waiver Indt/Jury

Plea/Date of Plea

Plea

Date

Plea

Date

Plea

Date

Adjudication (* see code)

Finding
Code

Date

Finding
Code

Date

Finding
Code

Date

Jail Term

Jail time credit

Susp. Imp

Jail time credit

Susp. Imp

Jail time credit

Susp. Imp

Probation Term

Susp. Imp

Susp. Imp

Susp. Imp

Cond. Discharge Term

Community Service

D/L Suspension Term

Fines/Costs

Fines:

Costs:

Fines:

Costs:

Fines:

Costs:

VCCB/SNSF

VCCB:

SNSF:

VCCB:

SNSF:

VCCB:

SNSF:

DEDRLab Fee

DEDRLab:

LAB:

DEDRLab:

LAB:

DEDRLab:

LAB:

CD Fee/Drug Ed Fnd

CD:

DAEF:

CD:

DAEF:

CD:

DAEF:

DV Surch/Other Fees

DV:

Other:

DV:

Other:

DV:

Other:

Restitution

Beneficiary:

Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes:

*** Finding Codes**

- 1 – Guilty
- 2 – Not Guilty
- 3 – Dismissed – Other
- 4 – Guilty but Merged
- 5 – Dismissed-Rule
- 6 – Dismissed Lack of Prosecution
- 7 – Dismissed – Pros Motion/Vic Req
- 8 – Conditional Discharge
- D – Dismissed- Prosecutor Discretion
- M – Dismissed- Mediation
- P – Dismissed-Plea Agreement
- S – Disposed at Superior
- W – Dismissed-False ID

Related Traffic Tickets and Complaints:

COMPLAINT - WARRANT (Court Action)

JUDGE'S SIGNATURE

DATE

Page 3 of 10

NJ/CDR2 1/1/2017

COMPLAINT – WARRANT (Court Action)

COMPLAINT NUMBER**1525****W****2024****000185****STATE V.****DOUGLAS J BOLLINGER**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

FTA Bail Information

Date Bail Set:

Amount Bail Set: \$

by:

☐ Bail Recog. AttachedReleased
on Bail
(v)

R O R

Committed
DefaultCommitted
w/o Bail

Place Committed:

Date Referred to

County Prosecutor:

Date of First
Appearance:☐ Advised of Rights by

Defendant Desires Counsel:

☐ Yes ☐ No**Prosecuting Attorney Information****Name:**

State

County

Municipal

Other

Defense Counsel Information**Name:**

None

Retained

Public Def

Assigned

Waived

Other

Original Charge

Amended Charge

Waiver Indt/Jury

Plea/Date of Plea

Plea

Date

Plea

Date

Plea

Date

Adjudication (* see code)

Finding
Code

Date

Finding
Code

Date

Finding
Code

Date

Jail Term

Jail time credit

Susp. Imp

Jail time credit

Susp. Imp

Jail time credit

Susp. Imp

Probation Term

Susp. Imp

Susp. Imp

Susp. Imp

Cond. Discharge Term

Community Service

D/L Suspension Term

Fines/Costs

Fines

Costs

Fines

Costs

Fines

Costs

VCCB/SNSF

VCCB

SNSF

VCCB

SNSF

VCCB

SNSF

DEDR/Lab Fee

DEDR

LAB

DEDR

LAB

DEDR

LAB

CD Fee/Drug Ed Fnd

CD

DAEF

CD

DAEF

CD

DAEF

DV Surch/Other Fees

DV

Other

DV

Other

DV

Other

Restitution

Beneficiary

Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes:**Related Traffic Tickets and Complaints:***** Finding Codes**

- 1 – Guilty
- 2 – Not Guilty
- 3 – Dismissed – Other
- 4 – Guilty but Merged
- 5 – Dismissed-Rule
- 6 – Dismissed Lack of Prosecution
- 7 – Dismissed – Pros Motion/Vic Req
- 8 – Conditional Discharge
- D – Dismissed- Prosecutor Discretion
- M – Dismissed- Mediation
- P – Dismissed-Plea Agreement
- S – Disposed at Superior
- W – Dismissed-False ID

COMPLAINT - WARRANT (Court Action)

JUDGE'S SIGNATURE

DATE

Page 4 of 10

NJ/CDR2 1/1/2017

COMPLAINT - WARRANT

COMPLAINT NUMBER				THE STATE OF NEW JERSEY VS. DOUGLAS J BOLLINGER	
1525	W	2024	000185		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	ADDRESS: 934 1-2 4TH AVENUE NEPTUNE CITY NJ 07753-0000	
POINT PLEASANT BEACH MUN CT					
416 NEW JERSEY AVE				DEFENDANT INFORMATION SEX: M EYE COLOR: HAZEL DOB: [REDACTED] 1967 DRIVER'S LIC # [REDACTED] DL STATE: NJ SOCIAL SECURITY # [REDACTED] SBI # [REDACTED] TELEPHONE # [REDACTED] (c) LIVSCAN PCN # [REDACTED]	
POINT PLEASANT BCH NJ 08742-0000					
732-892-1118	COUNTY OF: OCEAN				
# of CHARGES 2	CO-DEFTS	POLICE CASE # 22-0900666			
COMPLAINANT NAME: DET. N TESTA					

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 07/01/2019 in POINT PLEASANT BEACH, OCEAN County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY ENGAGE IN SEXUAL CONDUCT WITH VICTIM [REDACTED] WHICH WOULD IMPAIR OR DEBAUCH THE MORALS OF THE VICTIM, WHILE HAVING ASSUMED RESPONSIBILITY FOR THE CARE OF THE VICTIM, BETWEEN THE MONTHS OF JUNE AND AUGUST 2019, WHILE THE VICTIM WAS A STUDENT OF THE DEFENDANT'S, MORE SPECIFICALLY BY TOUCHING THE VICTIM'S BREASTS AND VAGINA UNDER HER CLOTHING, PURSUANT TO N.J.S.A. 2C:24-4A(1), A CRIME OF THE SECOND DEGREE.

WITHIN THE JURISDICTION OF THIS COURT, DID KNOWINGLY ENGAGE IN SEXUAL CONTACT WITH VICTIM [REDACTED] WHILE THE ACTOR HAD SUPERVISORY OR DISCIPLINARY POWER OVER THE VICTIM BY VIRTUE OF THE ACTOR'S LEGAL, PROFESSIONAL, OR OCCUPATIONAL STATUS, BETWEEN THE MONTHS OF JUNE AND AUGUST, 2019, WHILE THE VICTIM WAS A STUDENT OF THE DEFENDANT'S, MORE SPECIFICALLY, BY TOUCHING THE VICTIM'S BREASTS AND VAGINA UNDER HER CLOTHING, PURSUANT TO N.J.S.A. 2C:14-3(B), in violation of:

Original Charge	1) 2C:24-4A(1)	2) 2C:14-3B	3)
Amended Charge			

CERTIFICATION: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment
Signed: DET. N TESTA Date: 08/12/2024

You will be notified of your Central First Appearance/CJP date to be held at the Superior Court in the county of OCEAN
at the following address: OCEAN SUPERIOR COURT
120 HOOPER AVE
Date of Arrest: Appearance Date: Time: Phone: 732-504-0700
TOMS RIVER NJ 08753-0000

PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

☐ Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator Date Signature of Judge Date

☒ Probable cause IS found for the issuance of this complaint. TRACEY MCCRYSTAL JUDICIAL OFFICER 08/12/2024
Signature and Title of Judicial Officer Issuing Warrant Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: by: (If different from judicial officer that issued warrant)

☐ Domestic Violence - Confidential ☐ Related Traffic Tickets or Other Complaints ☐ Serious Personal Injury/ Death Involved

Special conditions of release:
☐ No phone, mail or other personal contact w/victim
☐ No possession firearms/weapons
☐ Other (specify):

COMPLAINT - WARRANT (DEFENDANT'S COPY)

COMPLAINT - WARRANT

COMPLAINT NUMBER

1525

W

2024

000185

STATE V.

DOUGLAS J BOLLINGER

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

A CRIME OF THE FOURTH DEGREE.

Original Charge

Amended Charge

COMPLAINT - WARRANT (DEFENDANT'S COPY)

Page 6 of 10

NJ/CDR2 1/1/2017

COMMITMENT

COMPLAINT NUMBER			
COURT CODE	PREFIX	YEAR	SEQUENCE NO.
1525	W	2024	000185
POINT PLEASANT BEACH MUN CT 416 NEW JERSEY AVE POINT PLEASANT BCH NJ 08742-0000 732-892-1118 COUNTY OF: OCEAN			
# of CHARGES 2	CO-DEFTS	POLICE CASE #: 22-0900666	
COMPLAINANT NAME: DET. N TESTA 119 HOOPER AVE TOMS RIVER NJ 08754		DEFENDANT INFORMATION SEX: M EYE COLOR: HAZEL DOB: [REDACTED] 1967 DRIVER'S LIC #: [REDACTED] DL STATE: NJ SOCIAL SECURITY #: [REDACTED] SBI #: [REDACTED] TELEPHONE #: [REDACTED] (C) LIVESCAN PCN #: [REDACTED]	

THE STATE OF NEW JERSEY
VS.
DOUGLAS J BOLLINGER
ADDRESS: 934 1-2 4TH AVENUE
NEPTUNE CITY NJ 07753-0000

To any Law Enforcement Official of New Jersey, You are commanded to transport this defendant to the Warden of this county who is required to keep the defendant in custody until a release or detention decision is made.

Offense	Aux Offense	Drug Code	Degree	Offense Description
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____

Commitment Reason:

You will be notified of your Central First Appearance/CJP date to be held at the Superior Court in the county of OCEAN
at the following address: OCEAN SUPERIOR COURT
120 HOOPER AVE TOMS RIVER NJ 08753-0000

Date of Arrest:

Phone: 732-504-0700

Signature and Title of Judicial Officer Issuing Warrant

Date

COMMITMENT

Affidavit of Probable Cause

COMPLAINT NUMBER			
1525	W	2024	000185
COURT CODE	PREFIX	YEAR	SEQUENCE NO.
POINT PLEASANT BEACH MUN CT 416 NEW JERSEY AVE POINT PLEASANT BCH NJ 08742-0000 732-892-1118 COUNTY OF: OCEAN			
# of CHARGES 2	CO-DEFTS	POLICE CASE #: 22-0900666	
COMPLAINANT DET. N TESTA NAME: 119 HOOPER AVE TOMS RIVER NJ 08754		DEFENDANT INFORMATION SEX: M EYE COLOR: HAZEL DOB: [REDACTED] 1967 DRIVER'S LIC. # [REDACTED] DL STATE: NJ SOCIAL SECURITY # [REDACTED] SBI #: [REDACTED] TELEPHONE #: [REDACTED] (C) LIVESCAN PCN #:	

THE STATE OF NEW JERSEY

VS.

DOUGLAS J BOLLINGER

ADDRESS: 934 1-2 4TH AVENUE

NEPTUNE CITY NJ 07753-0000

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:
SEE APPENDIX A.

Affidavit of Probable Cause

Page 8 of 10

1/1/2017

Affidavit of Probable Cause

COMPLAINT NUMBER

1525**W****2024****000185**

COURT CODE

PREFIX

YEAR

SEQUENCE NO.

THE STATE OF NEW JERSEY**VS.****DOUGLAS J BOLLINGER**

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

3. If victim was injured, provide the extent of the injury:

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: DET. N TESTA LAW ENFORCEMENT OFFICER

Date: 08/12/2024

Affidavit of Probable Cause**Page 9 of 10**

1/1/2017

Preliminary Law Enforcement Incident Report

COMPLAINT NUMBER			
COURT CODE	PREFIX	YEAR	SEQUENCE NO.
1525	W	2024	000185
POINT PLEASANT BEACH MUN CT 416 NEW JERSEY AVE POINT PLEASANT BCH NJ 08742-0000 732-892-1118 COUNTY OF: OCEAN			
# of CHARGES 2	CO-DEFTS	POLICE CASE #: 22-0900666	
COMPLAINANT NAME: DET. N TESTA 119 HOOPER AVE TOMS RIVER NJ 08754		DEFENDANT INFORMATION SEX: M EYE COLOR: HAZEL DOB: [REDACTED] 1967 DRIVER'S LIC. # [REDACTED] DL STATE: NJ SOCIAL SECURITY # [REDACTED] SBI # [REDACTED] TELEPHONE # [REDACTED] (C) LIVESCAN PCN # [REDACTED]	

THE STATE OF NEW JERSEY
VS.
DOUGLAS J BOLLINGER
ADDRESS: 934 1-2 4TH AVENUE
NEPTUNE CITY NJ 07753-0000

Purpose: The Preliminary Law Enforcement Incident Report (PLEIR) is intended to document basic information known to the officer at the time of its preparation. It is recognized that additional relevant information will emerge as an investigation continues. The PLEIR shall be in addition to, not in lieu of, any regular police arrest, incident, or investigation reports. Note that the PLEIR is specific to each defendant charged in an investigation.

- The offense involved a sexual crime.
- The defendant was known to the victim as:
 - Other/Explain TEACHER
- Child(ren) were present at the time of the offense and:
 - Child(ren) were the victim
- The case involves a consent search.

Certification:

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: DET. N TESTA LAW ENFORCEMENT OFFICER

Date: 08/12/2024

Preliminary Law Enforcement Incident Report

Page 10 of 10

7/20/2018

APPENDIX "A"

AFFIDAVIT OF PROBABLE CAUSE

- A. On Monday, August 29, 2022, this Affiant was assigned a sexual assault investigation. It was related that this was originally reported to the Lakehurst Township Police Department on August 26, 2022 via a walk-in by the victim identified as [REDACTED]. A report was generated by Patrol Officer Christian Hernandez, which was subsequently forwarded to this Affiant. In summation, the report relayed that the victim was sexually assaulted multiple times by a former teacher of hers, identified as Douglas Bollinger (DOB: [REDACTED] 1967). The victim related that this started in February of 2019 and continued up until right before her eighteenth (18th) birthday. This Affiant subsequently made contact with Detective Victoria Guarino of the Manchester Township Police Department, and the victim, and scheduled for the victim to provide a formal statement for September 8, 2022.
- B. Utilizing a law enforcement data base, it was learned that the defendant's date of birth is [REDACTED] 1967 and his current residence is 934 4th Avenue, #1-2, Neptune, New Jersey.
- C. On Thursday, September 8, 2022, this Affiant and Detective Guarino met with the victim at 7 Hadley Avenue in Toms River. She stated that her former teacher, Douglas Bollinger, sexually assaulted her on numerous occasions in 2019, while she attended the Performing Arts Academy located on Joint McGuire Airforce Base located in Lakehurst, New Jersey. The Performing Arts Academy is now renamed the Grunin Performing Arts Academy, and has since moved locations to Ocean County Community College in Toms River, New Jersey.
- D. The victim disclosed that she met the defendant in 2016 when she was a Freshman in high school [REDACTED]. The defendant was her acting teacher her Sophomore (2017-2018) and Junior (2018-2019) years and her film teacher her Senior year (2019-2020). She further disclosed that starting in February of 2019, halfway through her Junior year, when she was [REDACTED] "inappropriate" behavior began from the defendant towards the victim. The victim stated that the first time something happened was when she was attending the "Skills USA" program after school. The defendant was the advisor for the program. The victim stated that she went over to talk to the defendant about the project and while she was standing next to the defendant's desk, he was sitting in his chair. The defendant began rubbing the back of the victim's leg and eventually grabbed her buttocks. The victim stated that she grabbed his hand because she was "checking that she

was feeling this correctly" because she could not believe he did that.

- E. The victim continued to explain that the next time something occurred between the victim and defendant was a few weeks later, either during the end of February or beginning of March, 2019, while at "Battle of the Bands" located at the Stone Pony in Asbury Park. The victim stated that she had previously e-mailed the defendant asking if he would be attending because she was nervous to see him since it would be the first time that they interacted since the incident at "Skills USA" happened. The victim stated that everything during the concert was normal and she left after hearing her friend's band play. The victim stated that she and the defendant left the Stone Pony together and walked out near her car where they stood outside and talked for approximately two (2) hours. During the conversation, the victim stated that the defendant told her things like "I can't stop thinking about you" and "we could have so much fun being together but we need to be smart about this...you can't tell anyone". The victim stated that she felt like the defendant was trying to explore what kind of relationship they could potentially start. She also explained that she "did not comprehend the extent of what she was getting herself into." At the conclusion of their conversation, the victim stated that she went to put things into the passenger seat of her car and the defendant said words to the effect of "my hand isn't on your butt" and ultimately grabbed her buttocks.
- F. The victim further disclosed that in late February or early March of 2019 during her Junior year, the defendant kissed her for the first time in the "prop closet" or "dressing room" of the Performing Arts Academy on the military base. The victim stated that after the defendant kissed her for the first time, things progressed further on numerous occasions where the defendant would suck on the victim's nipples and would digitally penetrate the victim's vagina while at the school.
- G. The victim stated that these sexual encounters occurred approximately ten (10) times over the course of her Junior year. The victim further explained that the defendant would never let her put anything about them in written correspondence, and was firm in the fact that she was not allowed to speak to anyone about their relationship due to the potential of him being "put in jail" and ruining her future.
- H. The victim stated that in the summer entering her Senior year of high school (Summer, 2019), she would meet the defendant near his work in Point Pleasant Beach (a bike shop on Arnold Avenue, which no longer exists), where he would bring her to a specific area of the building where they were hidden, and touch her breasts and vagina under her clothes. The victim

specifically recalled an instance when she was menstruating and the defendant touched her vagina, but over her underwear. The victim stated that these sexual encounters occurred approximately three (3) times in Point Pleasant Beach.

- I. During the fall semester of the victim's Senior year, leading up to December of 2019, approximately eight (8) more sexual encounters including digital penetration and the defendant sucking and kissing the victim's breasts, occurred in the school on the military base. The victim stated that in December of 2019 during her Senior year, prior to winter break, she and the defendant entered into a part of the school she referred to as "487", a room on the base containing costumes and set pieces, so she could see everything one more time before they moved schools. The victim stated that the defendant went in early to open the building and go with her. The victim stated that it was the last time he "touched" her and while they were walking out, she told the defendant that she didn't feel comfortable touching him to which she stated that the defendant smiled and said "okay". She further explained that they returned to the hangar where the rest of the school was, and he kissed her goodbye which was the last time anything physical happened between the two of them.
- J. This Affiant asked the victim if at any point the defendant made her touch any part of his body to which she stated that he would grab her hand and put it on his "crotch" and apply pressure. This would occur either over his underwear or over his pants on different occasions.
- K. The victim was asked if she had ever seen the defendant after she graduated high school, to which she explained that she saw the defendant at graduation, she visited the defendant and his dog at his house once and nothing physical happened between them, and they spoke on the phone a few times to catch up about school afterward. She further stated that during her freshman year of college, she saw the defendant during the winter. However, the final time she went to his house he was not there and she solely went to visit the dog.
- L. The victim was asked who the first person was that she told about the sexual assaults, to which she stated that she told her boyfriend, R ■■■■■, approximately a year prior.
- M. On Thursday, September 8, 2022, upon conclusion of the victim's statement, the victim was explained her options as they pertain to a law enforcement investigation, which include the use of a Consensual Intercept phone call. The victim agreed to attempt the same. Supervising Assistant Prosecutor Mara Brater was contacted, and subsequently approved the Consensual Intercept on September 8, 2022 at 12:39 pm. A call was placed by the victim utilizing telephone facility ■■■■■, to the defendant ■■■■■ which was met with

negative results. A follow-up text message was also sent in the presence of law enforcement to try and illicit a response, which was also met with negative results.

- N. On Tuesday, September 13, 2022, at approximately 1230 hours, the victim attempted to contact the defendant again in the presence of this Affiant and Detective Guarino, utilizing a Consensual Intercept telephone call. The victim utilized telephone facility [REDACTED] and called the defendant at telephone facility [REDACTED]. The call was met with positive results. In short, the conversation yielded the following:
- O. The victim and defendant made conversation regarding her current college classes and student teaching. The victim asked the defendant how he was and what was going on with him to which the defendant responded that there was a lot going on, and asked if the victim had heard anything (regarding him). The victim asked the defendant what it was regarding at which point the defendant continued to explain that he "officially resigned" and that it was a "very long complicated story" that he would be willing to further explain in person.
- P. The defendant asked the victim what had prompted her to want to reach out and say hi to which she replied that she had been thinking about the past and that she wanted to see if they were on the same page about things. The defendant then suggested that they meet face to face and "reconnect like humans" and talk about everything that's going on. The victim and defendant further discussed which days would work best to meet and talk.
- Q. The defendant reiterated that he was very happy that they are going to see each other and that "eyeball to eyeball conversations are always more useful and productive than text or phone chats". The defendant told the victim to let him know what day would work best for her to meet.
- R. On September 13, 2022 the victim [REDACTED] phone was subsequently turned over to law enforcement at the conclusion of the previously placed consensual intercept telephone call, in order to be forensically extracted at the Ocean County High Tech Crimes Unit.
- S. On Friday, September 16, 2022, this Affiant received the full forensic cellular phone extraction. Upon viewing the extraction of the victim's phone, a copious amount of e-mail correspondence was observed between the defendant and victim during the course of the victim's high school career. The defendant utilized his personal e-mail account [REDACTED]. Additionally, the defendant utilized telephone facility [REDACTED] to engage in conversation with the victim.

- T. Text messages were exchanged between the victim and defendant at the direction of law enforcement. These messages were subsequently forensically extracted. Within the text message exchange, a plan for the victim to meet the defendant at Green Planet Coffee Shop in Point Pleasant Beach, New Jersey was ultimately made. It was determined that the meet would take place on October 4, 2022 at approximately 1200 hours.
- U. On Tuesday, October 4, 2022, At approximately 1245 hours, the victim entered the coffee shop and was able to position herself in front of a window where this Affiant, as well as other detectives conducting surveillance could maintain constant view of the victim. At approximately 1300 hours, the defendant arrived at the coffee shop utilizing a Green in color Jeep Compass bearing New Jersey registration [REDACTED]. The defendant was observed entering the coffee shop and sitting next to the victim in front of the window. Both parties engaged in conversation for approximately ninety (90) minutes in total.
- V. The victim was debriefed by this Affiant, Detective Guarino, and Detective Michael Augun of the Ocean County Sheriff's Department, who was assigned as a TDY to the Ocean County Prosecutor's Office, Narcotics Strike Force at the time of this investigation. The victim stated that at one point during their conversation, the defendant took his phone out and wrote in the text box "I can't talk about high school out loud."
- W. On Wednesday, October 5, 2022, law enforcement had the opportunity to review the audio recording of the conversation which took place between the defendant and victim at Green Planet Coffee Co.
- X. While reviewing the recording, the victim attempts to bring up speaking about their relationship while she was his student approximately forty-three (43) minutes into the conversation. The victim expresses to the defendant that she wanted to talk to him about things she never got to say and things that were not answered, and that she was having a hard time moving forward. The defendant responds by saying that the most important thing to him is that moving forward, they have a "healthy" and "mutually beneficial" situation. The defendant then continues to tell the victim that he wants to spend his time around people that he wants to support emotionally or intellectually, and wants people around him that would do the same thing. He further explains that his relationships are based on the foundations of "mutual respect, admiration, support, learning from each other, trust", and did not have any doubt that they had that 'foundation' between them and that they did not have to define their relationship at that point in time.

- Y. The victim then continued to talk to the defendant about how she wanted to figure their relationship out together because she thought it meant something to him and that one of the hardest things for her was that she did not know that answer. The defendant then responded with "that foundation part of it for me says it all", and "that it was important that she knows what he feels for her as a person." The defendant then continued to explain that he wants to show her and be available to her and have "more in depth" conversations.
- Z. The defendant continued to evade speaking about their relationship while the victim was in high school, and makes mention of his paranoia to discuss that aspect of their past out loud. At one point, the defendant is heard stating that he wished he had a notepad, and then there is a long pause in silence. The victim ultimately makes a comment about the defendant writing something on his phone for her to read.
- AA. On Wednesday, October 19, 2022, this Affiant conducted an audio-recorded statement of R■■■■■ R■■■■■, the victim's fresh complaint witness. R■■■■■ related the following information:
- BB. R■■■■■ and the victim had been in a dating relationship since March of 2021. R■■■■■ explained that one day in July of 2021, approximately four (4) months into their relationship, he and the victim were about to put a movie on in his room and started to cuddle when the victim "shut off" and told him not to touch her. R■■■■■ explained that he asked the victim what was wrong to which the victim started to cry. R■■■■■ stated that the victim told him that when she was in high school, her teacher "Mr. B" touched her inappropriately. R■■■■■ stated that he did not want to ask the victim any more information that she was not ready to share. He did, however, state that he asked the victim if she had ever told anyone before to which she told him he was the first person. R■■■■■ also related that the victim told him the touching happened at the "PAA" on the military base and at two (2) other locations and that the defendant would touch her private area. The victim also told R■■■■■ that the defendant had told her she was the only one he'd do those things with. R■■■■■ further explained that once the victim learned that the defendant was no longer at the school, she wanted to move forward regarding her experience with the defendant with the support of R■■■■■ and her family.
- CC. On November 10, 2022, this Affiant was provided four (4) year books and one (1) note, by the victim. These yearbooks are dated 2017, 2018, 2019, and 2020. All of these yearbooks corroborate that the defendant was a faculty member, specifically a theatre teacher, between 2017 when the victim was a freshman, and 2020 when the victim graduated high

school. The note provided by the victim was written on the back of a program titled "MENU" - "Junior Actor Showcase 2019 Cast" and dated May 3, 2019. This was the spring semester of the victim's junior year in high school. The victim is also listed as a member of the cast.

- DD. The defendant wrote the following: "[REDACTED], I don't want to think of PAA without you in it. You are my right hand woman & I appreciate everything about you. Your positive energy for those around you. Your compassion. Your leadership. Your work ethic. Your passion. Your drive. You are going to excel at whatever you do next. I will be in your corner always. I hope we get to work together as much as possible for the next year! B - Favorite showcase moment - All of Revolution! You 2 were stunning."
- EE. On November 18, 2022, this Affiant was provided a pink 2019-2020 planner and a black folder containing various school papers, by the victim. Included in these papers is a student schedule for the year 2018-2019 in which the defendant is listed as the victim's theatre teacher for both the fall and spring. There are also various tests and quizzes included that were administered by the defendant.
- FF. On March 29, 2023, this Affiant met with the victim at 7 Hadley Avenue. The victim made contact with the defendant utilizing her cellular phone. These texts were sent in an attempt to regain contact with the defendant after the conclusion of the aforementioned controlled meet. Text messages were exchanged in reference to a play the victim was directing and the defendant spending time with his mother. The text messages were preserved on the victim's cell phone and subsequently uploaded to Evidence.com.
- GG. On May 1, 2023, the victim returned to 7 Hadley Avenue to meet with this Affiant in an attempt to contact the defendant. The victim was presented with an Ocean County Prosecutor's Office, Consent to Assume Online/Cellular Telephone Presence, due to the fact that this Affiant was going to take over direct contact with the defendant in lieu of the victim and maintain possession of the victim's phone. The victim was also provided with an Ocean County Prosecutor's Office, Digital Evidence Consent Form, which she agreed to and signed.
- HH. Subsequent text messages were sent to the defendant in an attempt to plan another controlled meet. The defendant responded to this Affiant, stating that he was currently in New Mexico for a Film Festival. This Affiant texted the defendant regarding trying to get together with the defendant again to talk, to which the defendant ultimately agreed, although no firm plans were made.
- II. On June 5, 2023, this Affiant met with the victim at 7 Hadley Avenue in order for the victim to turn over an iPad for this

Affiant to utilize long-term, in order to maintain contact with the defendant. An Ocean County Prosecutor's Office Consent to Assume Online/Cellular Telephone Presence form was presented to the victim which she stated she understood and signed.

- JJ. On June 5, 2023, this Affiant began contacting the defendant via the victim's iPad. Text messages were exchanged in reference to attempting to meet up again sometime over the summer. No confirmed plans were made at this point, although the defendant agreed to keep the victim updated with scheduling in an attempt to see each other again.
- KK. On July 13, 2023, this Affiant contacted the defendant again in an attempt to solidify a day to meet. The defendant responded that his sister would be in town the following week, but after that would be free. A response was sent to the defendant stating that the victim's schedule would be checked and a day that week could work. The defendant responded stating that he would let the victim know before the next week ends what days could work. On July 21, 2023, the defendant contacted the victim providing an updated schedule of when he would be available to meet with the victim again. Conversation between the defendant and this Affiant referencing dates that could work were exchanged from July 21, 2023 to July 28, 2023. Ultimately, it was decided that the victim and defendant would meet on Thursday, August 3, 2023. The defendant suggested that they meet at his "old ice cream place in Point". A time of 2:30 was agreed upon. In speaking with the victim, she clarified to this Affiant that the defendant was referring to Strollo's Lighthouse Homemade Italian Ice, located at 101 Ocean Avenue N, Point Pleasant Beach, NJ 08742.
- LL. At approximately 1500 hours, the defendant arrived to the location and greeted the victim. They begin exchanging conversation regarding the defendant's job at a real estate company and softball league. The defendant and victim then walked up to the ice cream window together to order. Once they received their food, they sat back down at the table together.
- MM. Approximately thirty minutes into the meet, the defendant says "I honestly don't communicate too much with anyone from school... hardly any teachers, a few graduates for sure, I just talked to S [REDACTED] O [REDACTED] actually". The defendant then talks about how he is surprised that he does not speak to any teachers because they "think that something worse happened than what happened" and that he cannot communicate and clear the air with them, because there has been an "assertive recommendation/suggestion/demand from his attorney to not talk about anything related to school with anyone" (referencing his recent resignation from the school).

- NN. The defendant continued to explain that he told his attorney about the last time he and the victim met and the conversation that they had. The defendant clarified to the victim "not because of you and not because I don't trust you." The defendant continued to speak about how his attorney told him not to "clear the air" because someone could "try to clear the air, and it could be misinterpreted and then you're screwed". The defendant stated that he still keeps in touch with multiple parents from the Performing Arts Academy, but former staff have turned away from him.
- OO. The victim asked the defendant if he understood why she was upset the last time they met after their conversation ended, to which the defendant confirmed that he understood why she was. The defendant explained that multiple former students of his have asked him about why he no longer teaches at the school, but he cannot talk to them about it, the same way he cannot talk to the victim about when she was in school, because if something is said that is interpreted a certain way, he is "screwing himself".
- PP. The victim stated that she felt like their personal friendship was altered because they finally talked to clear the air, and the defendant continued to "dance around it" and then went "radio silent" for months. The defendant denied not reaching out on purpose, but admitted that he was "so fucked up by that day". The defendant continued to explain that he is still "super fucking paranoid." The defendant then tells the victim that she can "feel what happens to his voice and his body when he's even starting to talk about it".
- QQ. The victim asked the defendant if they are going to "talk in circles forever" to which the defendant responds "it does suck". The victim then says that she would think since the defendant is so far removed from the situation, they could have an honest conversation, to which the defendant says "here's what I can say, I can't yet, but I'm committed to doing so". The defendant then tells the victim that he is not ready to speak to the victim about what she wants to speak about. The defendant acknowledges that the victim wants clarity and to move forward, which he states he "understands". The defendant then says "I'm still telling you that I'm not ready, I'm telling you that I want to be and I will be, and it has to be the right circumstance, and I understand that that is not fair and I understand if that is something that keeps us from communicating."
- RR. The victim asks the defendant what the "right circumstance" would be, to which the defendant stated that he didn't know. The defendant clarifies that it is something that "he's thought about a lot". The defendant stated that he wanted to

- commit to communicating on a regular basis to ultimately lead to being able to have that conversation.
- SS. The victim explained that she wants clarification to close the chapter and move forward, to which the defendant completely agrees, and tells the victim that "for me, still, this is a real thing, I'm not inventing in my mind, some of it might be, but it's real for me, there's still a very strong paranoia that I have because of what has happened and because of what is ongoing".
- TT. The victim tells the defendant that she feels like he is invalidating it, to which he tells her he understands. The defendant then tells the victim that the life-altering that has gone on for him in the last year, has "shaken" him to the point that there are things he just can't talk about. The defendant told the victim that he understood where she is coming from and was trying his best to stay "within the boundaries that have been said to him by really smart people". The defendant told the victim that for now, it is something that has to wait.
- UU. The defendant further explains to the victim that he does not know when the right circumstances will be, but what he may need would be to be "put on pause" for a period of time. He then says he needs to regularly communicate with the victim before they have a conversation. The defendant then tells the victim that this has "100% to do with what has gone on with me at school". The victim responds that it has nothing to do with her, to which the defendant says "but it could, if something is interpreted the wrong way, if tomorrow you get pissed at me...".
- VV. The defendant clarifies that he is "building toward a comfort level" (with the victim) because of what is happening to him with school. The victim says to the defendant that no one has ever known what's happened between the two of them, and no one still does, and that she wanted to talk about it so she came right to the source. The defendant then acknowledged her frustration.
- WW. The victim says to the defendant "we were together, okay, then it ended". The defendant then says "let me say things". The defendant then says he wants to put his phone in his car. The victim tells the defendant she will "be right here" while waiting for him to do so. The defendant then asks the victim to come with him. The victim says there is no one around them and that she does not understand the issue. The defendant tells the victim that he is still paranoid.
- XX. The victim voices her frustration to the defendant regarding his lack of willing to discuss their past. The defendant acknowledges her feelings and says that he "understands". The defendant tells the victim what the "perfect conditions" for

them to have a conversation regarding their past would be. The defendant then says "you can see how it fucks me up when I even start to think about it". The defendant then says "the perfect conditions are us in a place where there are no other people and no electronic devices." The victim asks the defendant if he wants her to put her phone in her car, to which the defendant then says neither of us will have our phones. The victim then offers to put her watch and phone in her vehicle. The defendant and victim then proceed to walk over to their vehicles and put their electronic devices in their vehicles. The victim remains in possession of her purse, which the defendant questions. The victim tells the defendant that she is not willing to leave her bag in the car. It should be noted that the recording device was still located inside of the victim's purse at this time.

- YY. The victim and defendant continue to talk and the defendant begins by telling the victim that there are certain things that he cannot say out loud. The defendant tells the victim that he is proud of her and admires her, and that he wants to move forward with a "mutually respectful and positive" relationship. The defendant tells the victim that he is "trying to choose the right words" and explains that "whatever has happened up to this point, didn't stop because of anything other than me and my issues, fears, and thoughts". The defendant continues to explain that he still has positive feelings toward the victim and reiterates that there are still certain things that he cannot say out loud.
- ZZ. The defendant continued to speak about how he had made the decision for both he and the victim to stop communicating for a while, and that was wrong of him to do. The victim explained to the defendant that he always used to treat her like an adult although she was not one yet, and then he took that away from her. The victim explained that it felt like they had made progress and were previously on the same page, but things had changed. Explains that he hopes they can move forward and that he "accepts responsibility for making decisions thinking I know better".
- AAA. The defendant talks about moving forward with the victim and the defendant explains that he wants to talk to the victim more and hear more about what she is doing in life, and that has to be the "foundation" of them moving forward. The defendant explains that he feels like they have to talk on a regular basis to build that "trust and foundation". The victim explained that the open and honest conversations they used to have, have since changed.
- BBB. The defendant explains that there is a "list". Moving forward he wants to be "in her corner" regarding school, he wants to know if she's free weekends and to come around. The defendant

continues to explain that he wants "another sounding board" and knows the victim can be that for him. "Number three" the defendant thinks that the victim has so many exciting things going forward, she's going to have a lot of exciting things to feel good about, and the defendant would like to be there for that". The victim responds to the defendant and states that the defendant tells her they will get to the point where they will have open conversations, but it feels like every time she says something to him, the defendant gets "jittery". The defendant responds that there are a couple things that he won't say out loud. The victim then asks the defendant what her "parameters" are, to which the defendant asks if they can "move forward". The defendant then continues to speak in circles and tells the victim "again, moving forward, I think it's exciting to imagine doing the work and building up the connection again". The victim tells the defendant that she does not want what's happened in the past to happen again, based on the first time. The victim tells the defendant that she thought everything was great and that they had a nice mix of professional and personal relationship. The defendant then tells the victim that moving forward, any emotion, vibe or thoughts, they are going to communicate about anything moving forward. The victim tells the defendant that she does not feel that it is fair, because he is still dancing around what has happened between them. The defendant acknowledges that he understands.

CCC. The defendant continued to explain that it is "definitely" his intention to not talk about it too much and that he gets where she is coming from. The victim then says "I just don't want to ignore a whole piece". The defendant then clarifies that he is not ignoring. The victim says "you're dancing around it" to which the defendant says "I still have to a little bit". The victim calls the defendant "immature" to which the defendant says "listen, what could happen to me is not immature, that is still a real thing". The victim tells the defendant that it has nothing to do with her and that she has no idea what happened. The defendant clarifies that he could lose his house and that "it all could happen". The defendant urges the victim to back down a little from the specifics she's asking him to talk about.

DDD. The defendant tells the victim that anything that happened, happened because of a "fucking intense, strong overwhelming" connection. The defendant tells the victim that the "fear was the only thing that led him to make the decisions that he did". The defendant then talks about their intense and overwhelming connection, and those feelings partnered with their foundation was all very difficult to deny, and because all of that, was amplified by "moments that were some of the

most intense that I've experienced". He further stated that those connections "snowballed" and they were "all positive things".

- EEE. The victim speaks to the defendant about "why things ended" to which the defendant tells her that things ended solely because of him and nothing else. The victim then replies stating words to the effect that things ended right before she was finishing high school, and just wanted to make sure that it was not some "weird..." to which the defendant cuts her off and says "please don't even say it".
- FFF. The defendant reiterates to the victim that he wants to continue to spend time together and proceeds to ask the victim what her schedule is looking like for the future. He proceeds to explain to the victim what his schedule looks like in hopes to continue to see each other. The defendant tells the victim where his new office is located in Point Pleasant near Arnold Avenue. The defendant continues to talk about his work for a Real Estate company. At approximately 4:20pm, the defendant indicates that he has to leave to get to his softball league. The defendant walked the victim to her vehicle and they depart in their respective vehicles.
- GGG. It was related to this Affiant by the victim that the defendant was looking to meet with the victim again and was providing the victim with updates of his schedule and whereabouts. At the direction of this Affiant, the victim maintained text message communication with the defendant while law enforcement determined the next investigative steps that would be accomplished.
- HHH. Due to the fact that the defendant had the victim place her electronics in her vehicle during the previous controlled meet and subsequent concerns for safety, investigating officers determined that the use of a consensual intercept telephone call would be the next investigative tool used. On October 19, 2023 at approximately 1:00pm, Assistant Prosecutor Kimberly Carr approved the use of a Consensual Intercept. It was determined that the victim and defendant would communicate via a "Zoom" call.
- III. On October 19, 2023, this Affiant and Detective Rich Conklin of Manchester Police Department responded to the victim's off-campus residence in [REDACTED]. Once in the victim's room, this Affiant placed my department issued body worn camera out of view of the defendant, so as to capture the audio and video of the consensual intercept Zoom call.
- JJJ. The victim and defendant engaged in casual conversation, discussing topics such as life, school, work, and the process of student teaching and placement. At approximately forty-two (42) minutes into the Zoom video call, it concluded due to the limitations of the free version, necessitating a restart. The

body worn camera footage was concluded at approximately 8:57pm. The consensual intercept along with the body camera footage resumed at approximately 9:05pm when the victim created and sent a new link via e-mail to the defendant to begin a new video Zoom call as discussed prior to the last video Zoom call ending.

- KKK. At approximately nine (9) minutes into the second Zoom video call, the victim mentions when she composed an e-mail for the Zoom video link to send to the defendant, an old e-mail that he previously sent when she was in high school had populated. The victim alluded to the fact that the defendant's e-mail was inappropriate, and he should not have sent it. The defendant remained silent on the video call without expressing disagreement.
- LLL. At approximately twenty-six (26) minutes, the victim states "you used to do things to me, and you were like kind of almost in me". The defendant responded to the victim stating "I would very much like to see you, I'd like you to look at your schedule soon, and tell me when that could happen." The victim then asked the defendant "do you miss it?" The defendant then replied with words to the effect of "uhm missing anything is a different way to look at it. I'm looking at now and I'm very interested in now."
- MMM. At twenty-seven (27) minutes into the conversation, the victim states that she would like the relationship to pick up where they left off, asking the defendant if he understood. The defendant replied "mmmmhmm".
- NNN. At approximately twenty-eight (28) minutes, the victim states words to the effect of "a lot of that stuff like you fingering me, doing all those things, that was like the first time any of those things happened" and that she "wanted to get back to that point but from a different perspective if that makes sense". The defendant replied "it all does make sense and I would feel way more comfortable talking about this together in person".
- OOO. Later on in the conversation, approximately thirty-two (32) minutes into the second call, the defendant states "the easy conclusion for me is that I need to see you soon because you are having an effect on me that is very direct and very strong". The victim asked if it was the "same effect they used to have" to which the defendant responded that he "is not looking back".
- PPP. At approximately thirty-three (33) minutes into the conversation, the defendant stated that he is not in the position to talk about stuff and he is not going to do so. The defendant asked the victim to respect that. The defendant reiterated that he is still in a position where he cannot

- address some things and then says that the Zoom video call "exists" now and that someone will have access to it.
- QQQ. The defendant states approximately thirty-seven (37) minutes into the conversation "you're not getting the situation I'm in, and that literally my life could literally end and that is not an exaggeration".
- RRR. The victim continued to attempt to discuss their previous relationship when she was a student, the defendant continued to steer clear of mentioning the past due to the potential consequences. The conversation concluded at 9:46pm due to the limitations of the free version of Zoom video call and no other Zoom video calls were created.
- SSS. On August 6, 2024, Assistant Prosecutor Kimberly Carr approved charging the defendant with the following:
- Endangering the Welfare of a Child pursuant to N.J.S.A. 2C: 24-4A(1); Criminal Sexual Contact pursuant to N.J.S.A. 2C:14-3(b)