

NOTICE OF TORT CLAIM

This claim must be filed within ninety (90) days of the accident or occurrence, or you may forfeit your right. (N.J.S.A.59: B1, et seq.)

Claim Damages Against: Township of North Bergen

Forward to: Law Department Liability Claims/

North Bergen Town Hall

4233 Kennedy Blvd., North Bergen, NJ 07047

CLAIMANT INFORMATION

Derin	Michael	A.	[REDACTED] 1997
Last	First	Middle	Date of Birth
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Street Address	Mailing Address	City	State
[REDACTED]			
	Single		0
Social Security #	Marital Status		# of Dependents
[REDACTED]			
Home Telephone #			Work Telephone #

If notices and correspondence in connection with this claim are to be sent to a person other than the claimant, please complete this section.

<u>The Toscano Law Firm, LLC</u>	<u>973-226-1691</u>
Name	Telephone #
<u>155 Passaic Ave., Suite 420</u>	<u>Fairfield</u>
Mailing Address	City
	<u>NJ</u>
	State
	<u>07004</u>
	Zip Code

Relationship to Claimant: Attorney at Law (x) or _____

Explain Relationship

1. The occurrence or accident, which gave rise to this claim.

03/13/2025

Date

Time

AM/PM

2. Describe the location or the place of the accident or occurrence.

North Bergen Police Department

Municipality

Exact location of occurrence (Indicate exact street address)

Description of Accident:

Refer to Exhibit B attached hereto.

3. Draw a diagram of the area of the incident. Label all the intersecting streets. Indicate "North" with an arrow. Indicate house numbers where applicable. Mark "X" at the exact spot of occurrence and state distance in feet from the nearest intersecting streets if the spot is not otherwise identifiable. Indicate public property.

N/A

4. State the name and address of the City agency or agencies that you claim caused your damage/injury.

North Bergen Police Department

Township of North Bergen

5. State the names of the City employees whom you claim were at fault, including any information that will assist in identifying and locating them.

Chief Robert J. Farley, Jr., Deputy Chief David Corbisiero, Captain Victor Queiro,
Cpl. Antonio Tattarani, Det. Alberto Berivedes

6. State the negligence or wrongful acts of the city agency and city employees which caused your damage.

Assignment changed immediately after my father reported corruption within the police department
to the N.J. State Attorney General's Office. See also, Exhibit A attached hereto.

7. State the name and address of all witnesses to the accident or occurrence.

See Exhibit B.

8. State the name and address of all police officers and police departments who investigated the accident.

Unknown, but reported to the N.J. State Attorney General's Office.

Claim for damages (*Check the appropriate box*):

☐ Personal Injury

☐ Property Damage

☐ Other

If other, explain in detail: Permanent damage to professional reputation, inter alia.

If you claim personal injury:

a. Describe your injuries resulting from this accident or occurrence.

b. Do you claim permanent disability resulting from this injury?

No.

c. For each hospital, doctor, or other practitioner rendering treatment, examination, or diagnostic service state:

Name of Hospital Doctor	Address	Date of Treatment	Amount of charges to the date	Amount paid or Payable by other sources (i.e. insurance)
N/A				

d. Set forth in detail the list claimed by you for property damage.

N/A

e. Set forth in detail all other items, losses, or damages claimed by you and the method by which you made the calculation.

N/A

The amount of the claim: \$ To be provided upon completion of all discovery.

Have you made a claim against anyone (including insurance companies) else for any of the losses or expenses claimed in this notice?

No.

If yes, set forth the names and addresses of all persons and insurance companies against whom you have such a claim.

Are you of the losses or expenses claimed herein covered by any policy of insurance?

Unknown.

For each policy, state the name and address of the insurance company, policy number, and benefits paid or payable:

Have you received or agreed to receive any money from anyone for the damages claimed herein?

No.

If so, set forth the details of such an agreement:

The following items must be submitted with this notice:

- Copies of itemized bills for each medical expense or other losses and expenses claimed.
- Full copies of all appraisals and estimates of property damage claimed by you.
- Copies of written reports for all expert witnesses and treating physicians.
- A letter from your employer verifying your lost wages. If self-employed, a statement showing the calculation of your claimed lost income.

I hereby certify that the foregoing statements made by me are true and that the attached statements, bills, reports, and documents are the only ones known to me to be in existence at this time. I am aware that if any statement made herein is willfully false, I am subject to punishment provided by all.

Date

3-21-2025

THE TOSCANO LAW FIRM, LLC
155 Passaic Ave., Suite 420
Fairfield, NJ 07004

Claimant or person filing on behalf
of Claimant

To Whom It May Concern:

I hereby authorize all doctors, hospitals, or other medical service facilities to release to the _____ and all records, reports, and other information concerning the treatment of the claimant named herein.

Michael A. Derian
(Signature)

(This form must be signed by the claimant or the parents of the claimants who are minors.)

All information requested in this form must be provided so that fair and full disclosure of information necessary to the orderly and expedient administrative disposition of the claim may be had. Under the scheme of the New Jersey tort claims act, a governmental entity is afforded at least six months from the date of the receipt of a completed claim form to review and settle meritorious claims. Failure to provide complete answers to all questions and/or the withholding of information may result in forfeiture of the claimant's rights (N.J.S. 59:8-1, et seq.)

Exhibit A

MICHAEL A. DERIN v. TOWNSHIP OF NORTH BERGEN, et al.

RIDER TO TITLE 59 NOTICE OF TORT CLAIM

By acting in the fashion that the Township of North Bergen and others have, and by illegally, purposely, intentionally and with deliberate indifference violating certain rights Derin enjoyed within the NBPD, the following statutory, constitutional and/or common law rights were also grossly violated by the Township of North Bergen and others as against claimant Derin:

1. Civil Conspiracy.
2. Breach of the Covenant of Good Faith and Fair Dealing inherent in any contractual relationship.
3. Violation of the NJCRA.
4. Violation of the NJCEPA.
5. Violation of 42 USC 1983.
6. Intentional Infliction of Emotional Distress.
7. Violation of Criminal and Civil R.I.C.O.
8. Such other violations of law that continuing discovery may reveal.

Exhibit B

Good afternoon Sir,

My name is Michael A. Derin, I am currently a detective for North Bergen Police Department and have been assigned to the Chief's Office for the majority of my four year career. For the entirety of my time in the Chief's office, Captain Queiro was my immediate supervisor. The reason I am reaching out to you today is to speak to you about my experience in the chief's office and what I have had to endure.

1. Unlawful Orders

During my time in the Chief's office, there were multiple occasions where Chief Farley would approach me and advise me that he had a task for me to do that takes precedent over any of my work that I was assigned at that time. I believe he did this to me specifically because I was the lowest ranking officer in the office, the most inexperienced, and was the easiest to intimidate as I never saw him attempt to

assign these “tasks” to Captain Queiro, Cpl. Tataranni, or Det. Berovides. He always waited for my father’s shift to end and for him to leave before he would approach me and assign me these tasks.

The first “task” he assigned me, he advised me his daughter wanted to participate in a culinary class at her high school, but there were only limited spots for the class and to be able to participate in the class she had to write a letter to the teacher. He told me he knew I attended Steven’s Institute and graduated with honors, and that she would have a much better chance of being accepted into the class if I wrote the paper and ordered me to write the letter to the teacher. When I advised him I had multiple tasks to complete relating to my official duties, he instructed me to not worry about them and to just write the letter. Out of fear of what would happen to me if I declined, I agreed to write the letter. Immediately after being assigned this “task”, I went to speak to my immediate supervisor Captain Victor Queiro. I informed him the task which I was assigned by Chief Farley and that I was uncomfortable with doing this task and I had my

own work related to my official duties that needed to be completed. Captain Queiro then informed me that anything the Chief tasks me with takes precedent over any of my assigned duties. He then ordered me to comply with the Chief's orders or I would be "thrown back into patrol or worse". After hearing this I agreed and wrote the letter for his daughter. The content of the letter consists of me fabricating a story about how his daughter and their family have a tradition of making dinners together, and that she loves to try new recipes and using her family recipes which have been passed down the generations. This task took up the majority of my workday and I was unable to complete my work relating to my official duties that day.

The next task I was assigned by Chief Farley he explained that his daughter had to write a research paper for her history class and it was on the evolution of policing over the years. He informed me that his daughter was really struggling to write the thesis statement with a question/introduction paragraph. He then ordered me to write it for her and assured me that after I wrote the thesis statement and opening

paragraph, she would be able to complete the rest. When I informed him that I had my own work related to my official duties that needed to be completed, Chief Farley reassured me that there would be no consequences for me not completing my work that day and to write the paper. I then informed my immediate supervisor Victor Queiro that I was assigned this task by the Chief and would not be able to complete my work for that day and he again ordered me to comply and write the paper for Robert Farley's daughter. I understood that this was not optional, and I would face repercussions if I did not agree to write the thesis statement and introduction. At that time, I wrote the thesis statement and question for Robert Farley Jr.'s daughter Willow Farley. Upon completion I called Chief Farley to tell him I completed the essay for his daughter Willow. He then instructed me to email him the essay from my personal email address to his personal email address to which I complied. This again prevented me from completing my official duties that were assigned to me that day.

Some time after I completed the last task Chief Farley approached me and informed me I had "fucked it all up" referring to the introduction and thesis paper. He informed me that it needed to be a research paper and I need to find reputable online sources and cite them as a bibliography and that the paper needed to be several pages long. He said that since I fucked up the first time his daughter would not be able to write the paper on her own and it was now my responsibility and ordered me to write paper in its entirety. I informed him that it would take me multiple days to complete and I would not be able to get any of my work responsibilities completed to which he again said not to worry about and ordered me to write the paper. After hearing this I was extremely upset and went to my immediate supervisor Victor Queiro to inform him of what occurred. Captain Queiro then told me once again to comply with the Chief's orders or I would be thrown into patrol or worse. He stated that I would need to catch up on my work once this was completed. Throughout the next couple days when I arrived to work Chief Farley would constantly harass me and question my progress on the paper, stressing

that the deadline was approaching quickly. I informed him I was working on it as quickly as I could and would have it completed before the deadline. This forced me to not only work on this paper during my work hours but also at home after work in order to complete it on time.

Being ordered to complete these tasks that were for nothing but to benefit Chief Robert Farley and his daughter was absolutely humiliating. I felt emasculated and like there was nothing I could do about it. I did not feel like a police officer serving the community, but rather just a servant to Chief Farley and Captain Victor Queiro. At one point when I was working on the paper for Chief Farley at my desk, Corporal Tataranni walked in and asked me what I was working on and I informed him I was ordered to write a research paper for Chief Farley's daughter. In response to this Corporal Tataranni laughed at me and said "Do your job bitch!!!" in a joking manner which I did not find funny in any way. Captain Queiro and Chief Farley would constantly harass and taunt me that "daddys

not going to be around forever to protect you” and I would need to comply with their orders or they would not “protect” me after he no longer worked for the department. This has taken a huge toll on my mental health. Every day I went into work I was in fear of what would happen to me at work or what they were going to make me do and what they would do to my father if I did not follow their unlawful orders.

2. False Overtime

Recently I was ordered to pull a detail sheet from the payroll by Captain Victor Queiro because he wanted to hold onto one of his detail sheets and submit it next pay because he was going away on vacation and wanted to receive the money while he was away. While going through payroll I noticed that there was an overtime slip for corporal Lowman. When I examined the overtime sheet I noticed that there was no blotter page numbers, no times written down, essentially a blank sheet for 8 hours of overtime for completing CCW applications that was authorized by Chief Farley and verified by Captain Victor Queiro. This is corporal

Lowman's main day to day duties. When I sent the pictures to Captain Queiro via text he immediately called me and told me that he had no idea this was occurring and ordered me to not say anything as this could cause "big problems for him" and he will handle it. Out of fear of what would happen to me and my father if I spoke up, I just agreed to his orders, but made sure to save pictures of all of the sheets that dated back months. When Captain Queiro stated he would "handle it" I assumed that meant he would go back through the sheets and edit them to look like legitimate overtime slips. I had planned to go back and check these sheets at a later date for proof that Captain Queiro was editing and creating false documents, but have since been removed from the Chiefs office and can no longer check to see how Captain Queiro "handled it".

3. "Pranks" done by Chief Farley

Throughout my time in the Chiefs Office, Chief Farley would play what he called "pranks". These ranged from putting ink on door handles, putting firecrackers under

your chair so when you sat down they went off, purposefully eating messy to make the office a mess and having food all over peoples desk and floor, shaving himself on peoples desks, purposefully putting as much toilet paper as he could into the toilet as well as other objects and flushing it repeatedly until it was clogged so bad plumbers had to be called, defecating on the floor of the bathroom, the toilet of the bathroom, garbage cans in the bathroom, in garbage cans next to peoples desks, purposefully taking peoples keys and setting off their cars alarm in the parking lot and laugh until they would notice, etc. This was always a huge disturbance and made it very difficult to complete the tasks assigned to me. I even asked my immediate supervisor Victor Queiro if could please start my shifts later under the pretense that the traffic was bad at that hour and it made more sense for me to come in later because I feared if I told him the truth that I was trying to avoid Chief Farley, his behavior, and have as little contact with them as possible that they would “throw me in patrol or worse” in his words. These “pranks” almost always caused a huge mess in the office which Chief Farley left for the

cleaning lady Iris Burgos to deal with. Iris began taking pictures of the messes left by the pranks and was visibly upset by them and having to clean them. After Captain Queiro noticed Iris taking pictures of the aftermath of these pranks, he began to order me to clean them prior to letting Iris inside the Chief's office to conceal the actions of Chief Farley and prevent him from getting reported. But there were times these pranks were not even pranks and were actually a danger to fellow officers that Chief Farley showed complete disregard for.

On one occasion I witnessed Chief Farley take a handful of pills which I believed to be Viagra and Adderall and put them in the office coffee pot and stir it so they melted and waited for someone to drink it. I do not recall if someone drank from this pot, but I remember when he left the pot was immediately dumped out. After witnessing this I feared that he would put medication in there to make me purposefully fail a drug test if I didn't comply with his orders and began to drink strictly from the k-cup

machine because I did not feel it was safe to drink from the pot anymore.

Out of all of these pranks there is one that stands out very clearly due to it actually causing significant harm to others at the police department. On this occasion Chief Farley took hot sauce which he personally brought in, put it in a paper cup, and microwaved it essentially turning it in OC spray. I rushed to turn off the microwave as fast as possible but the fumes spread from the Chief's Office throughout the entire police department so bad the fire department had to be called in order to vent the building and get the scent out. The scent was so strong and similar to OC spray that it actually caused Lt. Moyano to have to go to the hospital via EMS. Chief Farley then ordered Detective Kevin Rodriguez to go into the armory and claim that the OC spray cans went bad and were leaking to prevent him from getting in trouble. I can assure you that is not the case and can easily be disproved. If you check the camera located on the town hall building and facing the police department, you will be able to witness that I begin to

open all of the windows in the chiefs office many minutes prior to the fire department being called. At one point I was struggling to breathe so badly you can witness me stick my head out of my office window gasping for air. After the fire department was called and the situation escalated, Chief Farley then ordered me to never speak about what I had witnessed that day or that things would get very bad. Out of fear of what he would do I complied with his directive.

4. Theft of time

While working in the office and on POSS one day, I noticed that Cpl. Tataranni was coming in early every day and requesting to be credited for 2 hours of compensatory time and then in the same day using 2 hours compensatory time to leave early. When I saw this I asked Captain Victor Queiro how this was possible since he was the one approving it and he was essentially working his regular shift but adding an hour into his time bank every day. In response, Captain Victor Queiro asked me why I was looking into other people's time and "clocking" them. He told me never

to do this again or my access to POSS would be removed and for me to worry about my time bank and he would handle it. After this occurred I never brought the issue up again out of fear of what would happen to me. This information can easily be verified by looking at our POSS system. You can go to Corporal Tattarani's ledger and check what days he is using "time off" and "overtime" on the same day. This issue was in the past possibly a year or two ago. When they removed me from the Chiefs office they also removed my access to POSS for everyone else and cannot look for a date at this time. I also fear that they would check the security logs for POSS and see I was looking at others peoples ledgers and would immediately be retaliated against.

This is not the only time I have witnessed an issue with Corporal Tattarani abusing time. Corporal Tattarani would frequently get into his personal car and leave the department a couple minutes early and then call the police desk via his cell phone to call off duty to get home a few minutes earlier. This was extremely common for him since I began to work in the office, but this all changed when the first complaint

about the details came in. Once this occurred Victor informed Tattaranni that the office was now being “watched” and if people knew that Captain Queiro allowed him to do this they would “both be fucked”.

Another common occurrence was Det. Berovides and Cpl. Tattaranni often leaving the office to go get vitamin infusions at a clinic nearby while on duty. When I asked them if it was okay to do that they informed me that it was the same as going to the police doctor on duty and it was completely okay. They even went as far as saying that I should go and try it but not to tell my father I went. I could tell from this response that they might not have been completely truthful with me by that statement and decided never to go.

On one occasion when Det. Berovides worked his detail and then went into the office after for his shift, I was still working. He informed me that he would be going to home to take a shower and change at his house and that he would be back later to sign off duty. He left in his uniform and when he arrived back hours later he was wearing plain clothes and walked in,

grabbed some things from his office, and then walked out to the front desk to sign off duty.

5. Theft of guns from the armory

Very recently this incident occurred after Chief Farley had a claim filed against him and I arrived at work and Captain Queiro and Detective Berovides were talking to each other at my desk as Detective Berovides often uses my computer, I am not sure why he does but I never questioned it as I have learned if I ask questions they will not be answered and I will be questioned as to why I am asking questions. When I arrived to work Detective Berovides was speaking about a gun that he had taken from the armory. He stated he took an AK-47 style rifle and what should he do. Captain Victor Queiro told him that “shits really about to go down and you need to get rid of it. Only the lower part of the gun has a serial number that can be traced you can keep the upper parts as those are not traceable.” Detective Berovides then turned to me and asked, “You’re a guns guy, is what he is saying actually true bro?”. I replied, “yes its true, only the lower part of the gun has a serial number.” He then asked me what was the best way of

destroying that part of the firearm is. I stated that I was not sure how to dispose of it at which point Det. Berovides went back to his office.

6. Smashing the monitor

On one occasion I witnessed Chief Farley become enraged and smash the monitor for the Chiefs Office Door. On this occasion there were a lot of people coming in and out of the Chief's Office for work-related issues that day. When Chief Farley walked in and someone was in the office he sat down and waited for the person to leave. Once the person left, he began uncontrollably shouting "Im fucking sick of people coming in this office. What the fuck did I say, do not buzz anyone in this office unless I fucking say so. Actually, ill solve this right now" at which time he proceeded grab the monitor and rip it of the wall and throwing it on the ground and smashing it with an object I do not recall at this time. After smashing the monitor several times, he then turned his attention to the doorbell. He pulled up a chair and stood on it and then proceeded to rip the doorbell out of the wall. He then swung the doorbell by the cord and smashed it

into several things including the floor, desks, and the broken monitor on the ground. He then stated, "there, problem solved". After this Chief Farley left the office and got in his vehicle and left. After he left, Captain Queiro then ordered me to order a new monitor to replace the broken one before anyone noticed. After cleaning up the monitor and doorbell and disposing of it, he then told me not to order the monitor and that he would take care of it as he wanted to get it done quickly.





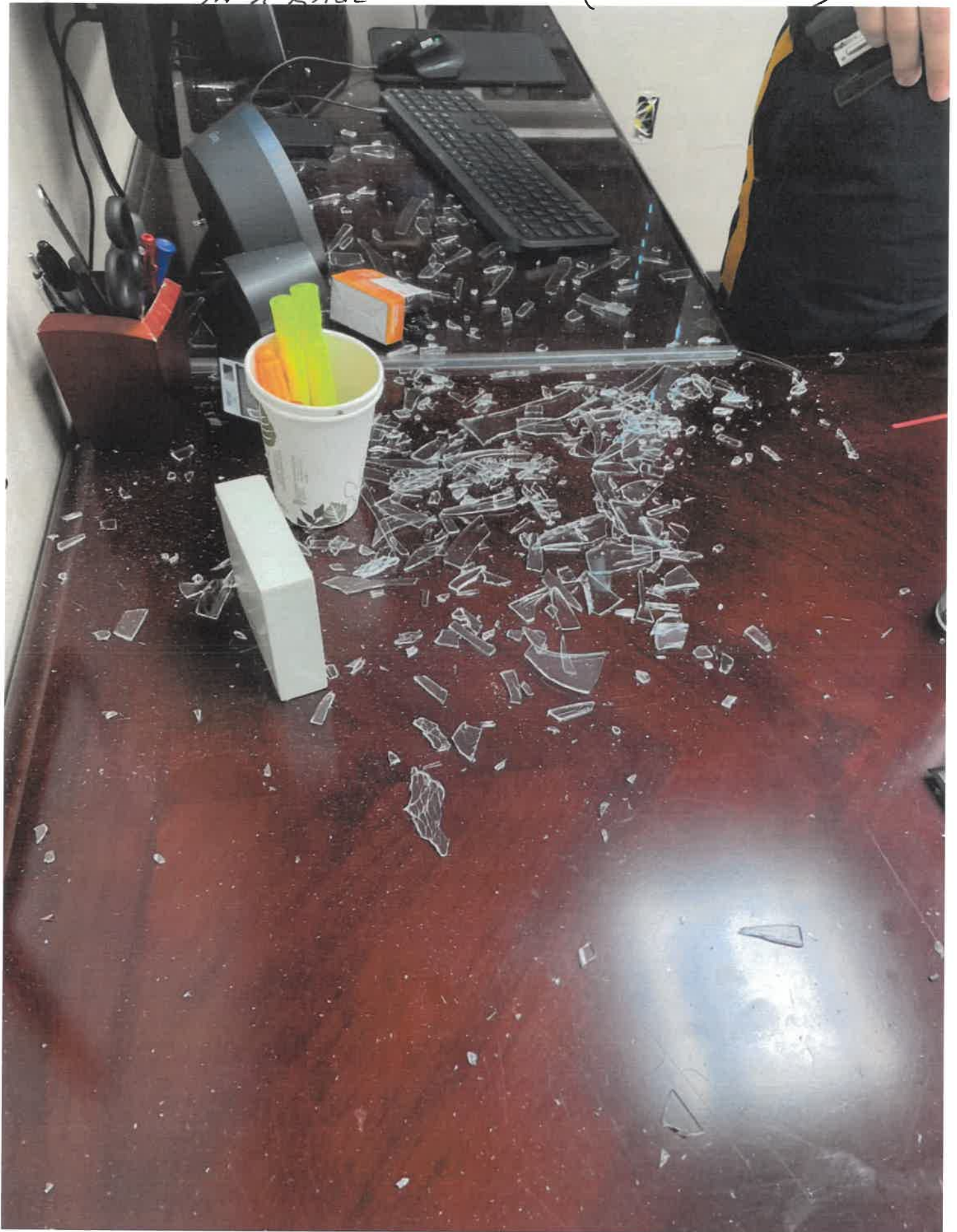
SHIPPED TO LT. GUZMAN'S
HOME BY CHIEF FARLEY



SHIPPED TO LT. GUZMAN'S HOME
BY CHIEF FARLEY



CHIEF FARLEY BROKE GLASS (THREW A PLAQUE)
IN A RAGE



3/13/25, 7:57 AM

CHIEF FARLEY THREW
EGGS AT THE DOOR IN
HEADQUARTERS

IMG_5630.jpg

