

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	F.		1966
Last	First	Middle		Date of Birth
Street Address	Mailing Address	City	State	Zip Code
		Married		0
Social Security #		Marital Status		# of Dependents
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.

Twp. of North Bergen

Attorney General's Office, 240 Cedar Knolls Rd., Hanover NJ

Municipality

Exact location of occurrence (Indicate exact street address)

Description of Accident:

In short, while at the AG's office reporting police corruption, I was contacted via
phone by Captain Victor Queiro and informed me that I was terminated. The retaliation
for reporting this blatant corruption within the department could not have been more
obvious. For more specifics, please refer to my narrative attached hereto as Exhibit B.

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.

Township of North Bergen Police Department, 4233 Kennedy Blvd., North Bergen NJ 07047

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, Police Commissioner Alan Pascual, Twp. Admin. Janet Castro

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

Abused for months, then wrongfully terminated after I reported corruption. My son has also been retaliated against. See also, Exhibit A attached hereto.

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

Lt. Alex Guzman, Attorney General Det. Knox, Attorney General Sgt. Portner were advised of the termination call.

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

N/A

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

☐ Personal Injury

☐ Property Damage

☐ Other

If other, explain in detail: A. Damage to professional reputation.

B. Lost wages

C. [REDACTED]

If you claim personal injury:

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

Previously answered.

- 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.

N/A

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.

3-21-2025
Date

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.


(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 F. 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 illegally terminating and violating certain rights enjoyed by Derin 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. Wrongful Discharge/illegal termination.
2. Civil Conspiracy.
3. Breach of the Covenant of Good Faith and Fair Dealing inherent in any contractual relationship.
4. Violation of the NJCRA.
5. Violation of the NJCEPA.
6. Violation of 42 USC 1983.
7. Intentional Infliction of Emotional Distress.
8. Violation of Criminal and Civil R.I.C.O.
9. Such other violations of law that continuing discovery may reveal.

Exhibit B

Michael F. Derin Jr.

*Highlighted numbers have supporting documents.

1. 7/1/2017: I returned to the North Bergen Police Station employed as an SLEO2
2. 10/11/2017: Assigned to the chief's office.
3. 1/26/2023: D. C. Farley promoted me to SLEO2 Special Captain.
4. 12/13/2023: D.C. Farley, Captain Querio, Lt. Guzman, and myself all vacation as best friends in Saint Barthelemy.
5. 02/01/2024: Farley becomes Chief police.
6. 02/01/2024: Chief Farley assigns me and Lt. Guzman as his administrivia aides.
7. Approximately 08/2024: Chief Farley chases me around his office after corning me in the filing area with no further room for retreat, he sticks a hypothermic needle through my jeans into the tip of penis. The incident draws blood and further humiliates me when I later had to explain the incident to my wife. When I told chief Farley I was unhappy with his actions, he told me that I didn't know how to take a joke.
8. Approximately 09/2024: OPRAs start appearing in OPRAMACHINE.COM. For some reason Chief Farley starts expressing his thoughts that Lt. Guzman is the one sending them.
9. Approximately 10/2024: Lt. Guzman gets kicked out of the chief's office.
10. 10/11/20224: Chief Farley explains to me he can't trust Lt. Guzman anymore. He explains he is going to take him off the order making him his administrative assistant and he will re-issue the order making me his only administrative aide.
11. 11/21/2024: Chief Farley responds to the police station room the league of municipalities conference in Atlantic City. He orders Capt. Querio to back date a report about an incident that occurred approximately 10/10/2024 where a message was relayed from Lt. Guzman to Chief Farley. Chief Farley explains that even though the report is being done on November 21st, Captain Queiro is to back date the report to make it appear like it was created approximately October 10th, 2024. Captain Queiro created the report and does back date is as ordered. Chief Farley tells Captain Queiro and I he will only use the report if he has too.

12. 1/24/2025: Chief receives tort claim that Lt. Guzman intends to sue him. The Chief immediately changes his attitude towards me and starts harassing me inferring that I am feeding Lt. Guzman information. From this point on, the Chief creates a hostile work environment for me that quickly filters down to Cpl. Tattaranni and Det. Berovedes who immediately start harassing me and disrespecting me in the office. They immediately start provoking conversations that pit me and Chief Farley and D.C. Corbisiero against each other and then quickly relay the information to Chief Farley and D.C. Corbisiero so they could attack me.
13. 02/03/2025: Things get worse. Chief Farley, Cpl. Tattaranni and Det. Berovedes step up their hostility and try to humiliate me in front of people every chance that they get. Cpl. Tattaranni starts sending me photos of D.C. Corbisiero going through my son's desk and computer telling me that Farley gave him permission to come in even after I advised against it because there were documents that I was responsible for and he had not had access for the prior two years. This was obviously an attempt by Cpl. Tattaranni to get me to say negative things about the Chief and Dept. Chief to relay back to them.
14. 02/06/2025L Capt. Queiro informs me that there will be no overtime under any circumstances for myself, Tattaranni or Berovedes. I do a check of the payroll approximately 2 weeks later and it show contrary to Capt. Queiro's statement, either Tattaranni or Berovedes received overtime on 02/07/2025, 02/11/2025, 02/13/2025, 02/18/2025. The only difference with these overtime sheets is that they were filled out and signed by Dept. Chief Corbisiero in his office so that I would not realize that I was the only overtime cut. It is obvious now that Berovedes and Tattaranni were receiving rewards of overtime for baiting me and relaying the information to the Chief and Dept. Chief.
15. 02/19/2025: Lt. Vitali informs me that Chief Farley and Dept. Chief Corbisiero had informed him that I am not to be given any more details because someone has filed a grievance against special officers working details. I called both PBA presidents to confirm the grievance and neither one of them knew anything about any grievance. I had obviously been given false information as an excuse to cut my details. Until this date 03/14/2025 no grievance has ever been filed about me or any other Special working details. Although, I have never received another detail since the false information was provided to me on 02/19/2025. This was obviously Chief Farley and D.C Corbisiero further trying to humiliate me and drive me out of the police station by cutting my details. It should be noted that I process the detail sheets and have processed at least 17 detail sheets of other specials working, which means I was literally the only one cut out of the details.

16. 02/20/2025: I receive an outstanding performance valuation report from Capt. Queiro. I review the report and sign it. The report praises me for being a mentor to the peers that work in my office. The narrative explains that I should continue to assist the chief's office far into the future.
17. Approximately 02/21/2025: I express to Tattaranni and Berovedes as well as D.C. Corbisiero that I know that I am the only one who had my overtime and details cut. I explain that this is a hostile work environment and harassment and I intend to tell outside council during my interview about these ongoing situations. Later, the same day, Chief Farley, and D.C. Corbisiero corner me alone in the Chief's office. They start telling me that if I am going to start telling outside council facts that will negatively affect them, that I can't be trusted to work in the chief's office, or maybe even the police department for that matter. The Chief explains to me that Det. Berovedes and Tattaranni have been telling them everything I say after they make me angry. After everyone leaves, Chief Farley tells me depending on what I say to council, myself and my son, who also works in the Chief's office could possibly be moved out of the Chiefs office or possibly fired. Around the same time the Chief receives a phone call on his cell phone. I heard the head of IA Lt. Hernandez tell Chief Farley to come into his office so he can tell him who the next 3 witnesses are and tell him what was said to the outside council by the first few witnesses. At this point, I realize that anything said to outside council would get back to Chief Farley. There was obviously a leak in the process.
18. 02/24/2025: I receive a phone call from internal affairs. They order me to report to CPIC for an interview with outside council. I respond to the interview, and I am met by outside council attorney Michael Koribanick. I express to Mr. Koribanick my concerns about being ordered in to see him by the internal affairs until, yet he is telling me this is not an internal investigation. I also express that I was uncomfortable not receiving any documents indicating whether I was the target or witness to this investigation. The last thing I pointed out to him before the interview started was that he was interviewing me 14 feet from the door and doing this might intimidate myself or any other employees called in to give information about the Chief. The Chief could have easily been sitting on the other side of the door. Mr. Koribanick began to interview me asking questions about the Chief's behavior and pranks. I was very limited on what I supplied to him due to the fact that I had personal knowledge that it would immediately get back to the Chief. I informed him of the Chief's sometimes aggressive and moody behavior, smashing monitor, TV's, and other items in the office when he became angry. I also informed him that the Chief spreads ink throughout the office so people would get it on their hands and uniforms. The Chief has also burned peppers in the microwave on several occasions to the point where the office had to be evacuated. One time, even causing an employee to be treated by EMS. I, however, didn't tell him the following things because I knew it was humiliating to me and the Chief had already threatened me not to expose him in a negative light. The first incident is the Chief defecating on the floor of the police station

19. many times. Several times, I had to personally clean the fecal matter so that the elderly cleaning woman would not have to do so. The second thing I didn't tell was that the Chief would shave his body hair on people's property, their persons, and their food. He also was fond of scraping fluids from his underwear onto people seated in the Chief's office. He also brought in several sex toys that he explained he couldn't talk his wife into using, so someone might as well take them. The last and most humiliating incident that I didn't explain to outside council was when he stuck the hypodermic needle through my penis. Explaining the incident to my wife was still one of the most humiliating experiences in my 35 years of police work. I immediately explain to the Chief that I was very uncomfortable and unhappy with the incident. He disregarded my feelings and told me I must learn how to take a joke. On my occasional the Chief has also thrown fireworks that he has bought out of state in the office. The last thing that I explained to outside council before leaving was how concerned I was about the phone call I overheard between Chief Farley and internal affairs. I told him knowing that everything I said would get back to Chief Farley, really affected the way I answered the questions, and he should either do something about the leak or stop interviewing in the police department.
20. After the interview with outside council the hostile work environment increased by tenfold. Chief Farley, Det. Berovedes, and Cpl. Tattaranni openly slandered Guzman several times an hour. Baiting me into an argument. I explained to them over and over that I am not on either side. I am on the side of the truth, and it would be prudent of them to tell the truth themselves when they went in instead of always sticking up for one side or the other to ensure they had overtime and details. Tattaranni specifically got aggressive about Guzman numerous times calling his wife an alcoholic and piece of shit.
21. On approximately March 12th, 2025, I went to the computer and tried to put my hours in as I have done for the past couple of years. I noticed my access was blocked and I couldn't perform these actions. After trying to get on for an hour I finally sent out an email to Capt. Queiro, Cpl. Tattaranni and Det. Berovedes to ask if someone has changed my access and blocked me and why. Till this day nobody has answered my email in an attempt to avoid documenting the incident. When Tattaranni came in he explained he did so under direction of D.C. Corbisiero but was told not to tell me.
22. 03/13/2025: Capt. Queiro arrived to work. He ordered me into his office. He explained to me that even though he and D.C. Corbisiero had already reviewed, approved and signed my stellar evaluation report on 02/20/2025 that he was ordered on this date 03/13/2025 to destroy all copies of the good evaluation, remove them from everywhere they are and replace them with an evaluation report that D.C. Corbisiero will compose. It should be noted that I sometimes go 6 months without seeing D.C. Corbisiero and has no information about my evaluation status. I immediately explained to Capt. Queiro that

destroying a 3-week-old police document that had already been approved by all parties and placed in my file and then replacing it with a evaluation created to do nothing by destroy my reputation is a highly illegal and unlawful order. I further explained to Capt. Queiro that he is not under any obligation to follow unlawful orders. Capt. Queiro stated "Mike, look what they are doing to you. I can't be in their crosshairs. I'm sorry, I have to do what I have to do. "I informed Capt. Queiro that his willingness to follow an unlawful order and commit a crime simply to stay in the good graces of D.C. Corbisiero and Chief Farley had literally made me sick and nauseous. I requested he put me on the sick list so that I could go home as I was not feeling well after the incident. After Capt. Queiro put me on the sick list, I explained to him that I would be going home to rest, after I went to the attorney general's office in Hanover to report the incident. As I was leaving the police station, I called Lt. Guzman and informed him that I was responding to the attorney general's office as I was increasingly being harassed because they thought I was supporting him. At that time, he told me he had some stuff he wished to report and asked if I could pick him up so he could report to the attorney general's office with me. We arrived at the attorney general's office approximately 2 hours later. While walking through the hallways to find the interview room my phone rang. Upon answering the phone Capt. Queiro identified himself. He explained to me that in the 2 hours since the time I informed him I was going to the attorney general's office, township administrator Janet Castro had reviewed my pay, determined it was too high and ordered them to terminate my employment. Capt. Queiro further explained that coincidentally in the same two hours that I explained to him that I was going to the attorney general's office two officers had come forward to make hostile work environment complaints against me. These occurrences obviously didn't happen in the two hours that I explained I was going to the attorney general's office and is obvious to any prudent individual that this was retaliation for going to the attorney general's office in an attempt to tarnish my testimony. At the time I left the police station to respond to the attorney general's office I have never been the subject of a complaint since 2017 when I returned to my employment. I also had no prior knowledge of the police department conducting any internal investigations which means both circumstances were create while I was on the way to the attorney general's office to report their illegal activity. Four hours later the chief made good on his final threat moving my son from the Chief's office assignment to midnights in patrol. Another obvious form of retaliation. It should be noted that sometime during the week of 03/13/2025, I am unsure of the exact date, but I head Chief Farley in the bathroom talking loud over the phone asking someone "what happens if I sign criminal charges against him." I'm not sure what the person on the other side of the phone said, but Chief Farley seemed happy and said "Okay, so then if I sign complaints against him for something criminal, his civil case stops until that criminal complaint is done...good, that buys me some time."

*Certain still photographs are attached hereto and separate video will be provided in due course.

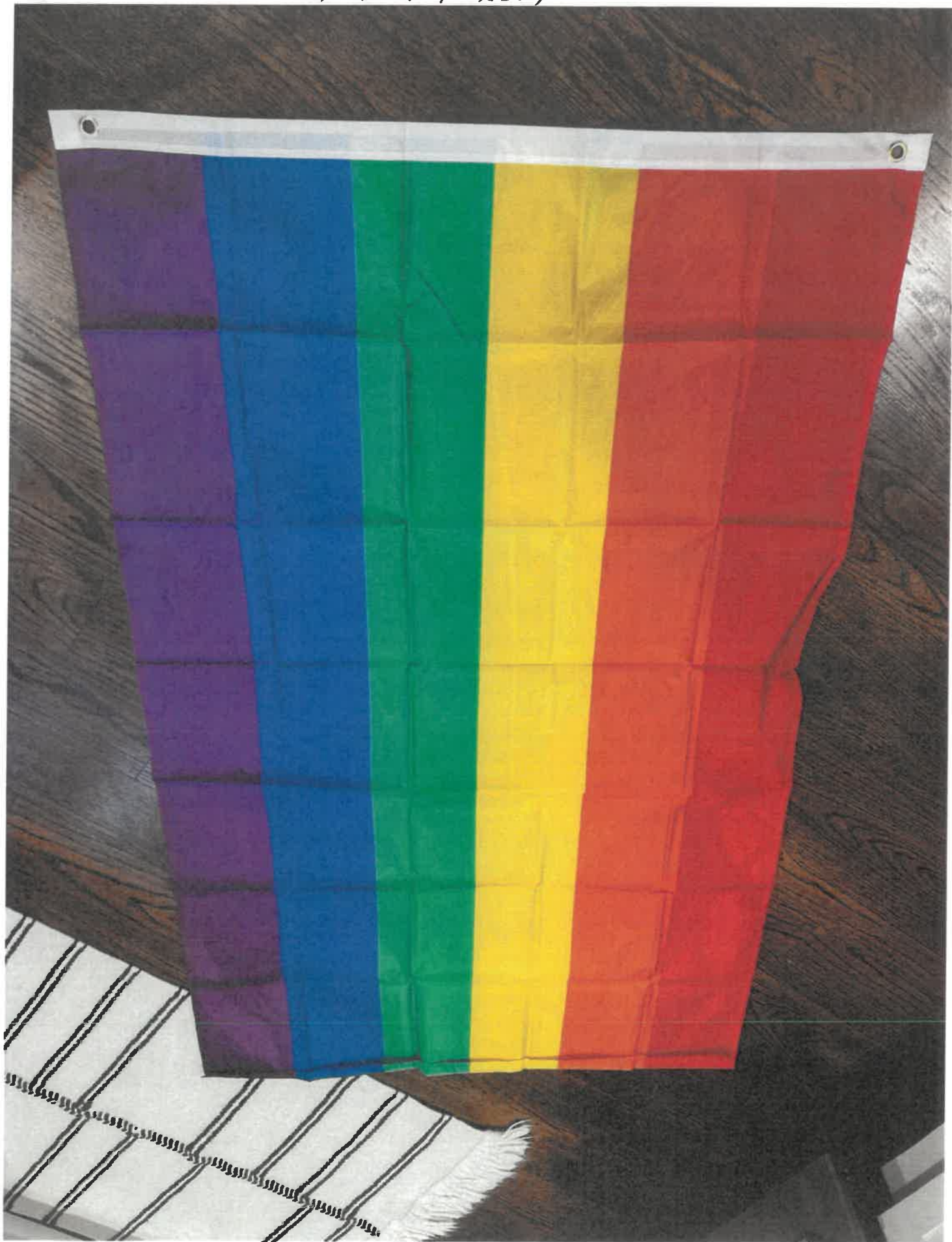




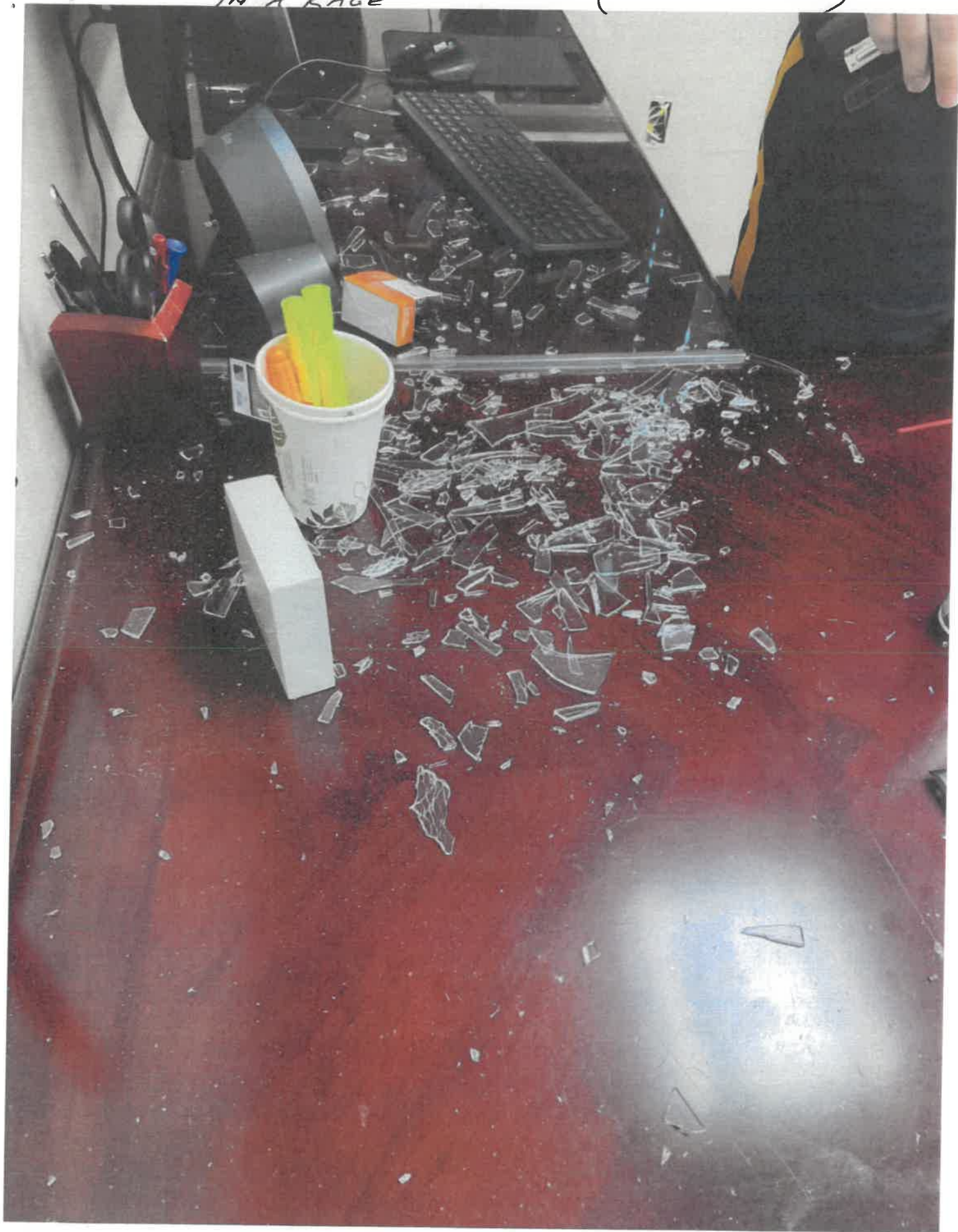
SHIPPED TO LT. GUZMAN'S
HOME BY CHIEF FARLEY



SHIPPED TO LT. GUZMAN'S HOME
BY CHIEF FARLEY



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



CHIEF FARLET THREW
EGGS AT THE DOOR IN
HEADQUARTERS

