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March 24, 2025

VIA E-MAIL: **TKobin@chasanlaw.com**

Thomas Kobin, Esq., No. Bergen Township Attorney
Chasan Lamparello Mallon & Cappuzzo, PC
300 Lighting Way
Secaucus, NJ 07094

**RE: Lieutenant Alex Guzman v. Township of North Bergen
 (Title 59 Notice of Tort Claim)**

Dear Mr. Kobin:

As you are aware, our law firm represents North Bergen Police Department Lieutenant Alex Guzman with reference to his claims as against North Bergen for violations of 42 USC 1983, N.J.S.A. 34:19-1, et seq., N.J.S.A. 10:6-2 and an illegal failure to promote claim.

Please amend our client's Title 59 Notice of Tort Claim to include the attached, and consider same as though certified.

Thank you.

Very truly yours,

s/ Patrick P. Toscano, Jr.

Patrick P. Toscano, Jr.

PPT/njt
Attach.

c: Nicole Avella (via e-mail: navella@northbergen.org)
 Angela Leon, Esq. (via e-mail: ALeon@chasanlaw.com)
 Lieutenant Alex Guzman (via e-mail)

Chief Farley claims that I gave a to Captain Queiro a "message", it must be clarified that I never stated that the grievance Officer Durango filed against me needed to be handled in an advantageous manner. I am confident that I did absolutely nothing wrong and I have no concern over Officer Durango's completely baseless claims.

The issue lies with Chief Farley's persistent habit of using intermediaries to relay messages between his subordinates instead of addressing them directly, including the subordinates who work in his own office. This practice has caused significant misunderstandings, as messages are often delayed, forgotten, or unintentionally misconstrued. In some cases, hours pass between when the messages are sent and received, further compounding the confusion. Captain Queiro eventually asked him to speak with me directly due to the increasing difficulty of accurately relaying these messages as well that it was taking a personal toll on him, but he refused.

Captain Queiro then backdated this report which he wrote on 11/21/24 to 10/15/24 at Chief Farley's direction. The actual date of our interaction was 10/09/24. At this time I do not know if Captain Queiro distorted the information on purpose or not since he purposely backdated the report.

To clarify, I did mention that if Officer Durango had been incited to sign a baseless grievance against me since Officer Durango did not have a grievance for months until she had a meeting with Chief Farley that he had called for, then she immediately signed a complaint right after, coupled with his direct accusations that I had written an OPRA request attacking him, I might consider filing a grievance myself. On 09/09/24, he accused me of creating an OPRA request, which notably also referenced my best friend, Sgt. Anthony Ortiz, labeling him as the "fleet manager." Later, he apologized repeatedly to me in front of Special Captain Derin, only to shift his accusations to the patrolmen that he eventually moved to different assignments and then back to me. It is utterly illogical and nonsensical to suggest that I would implicate my best friend in such a request. Feeling unfairly accused and targeted, I mentioned the possibility of filing a

grievance if this baseless behavior continued.

Since then, Chief Farley has not stopped spreading false claims that I am behind the anonymous OPRA request attacking him with absolutely no proof whatsoever. Chief Farley has commented to several colleagues of mine that I am behind the OPRA attacks, even causing a strained relationship with these colleagues after they voiced their opinion that they do not believe that I am behind these requests. Chief Farley's reckless behavior has left me feeling completely alienated in the Police Department, where an Officer has told me that he was asked if he had an issue working off duty details with me before he was assigned the detail.

The discord within the department, which he has cited as the cause of the current issues, actually began when he decided to work off-duty details, a decision that I had advised against. As his administrative aide, I warned him that this could cause problems for him, and I also shared my concerns with Captain Victor Queiro. I emphasized that while working off-duty details may have been permitted contractually, the legality and optics of the decision were separate matters, and both had their own consequences. Despite this advice, he dismissed it, stating that it was within his rights and that he did not care. The ensuing unrest within the department began shortly thereafter, as I had predicted. It is noteworthy that I was not the only advisor to advise him about the potential consequences of his excessive off-duty details work. I personally feel that this advice that I gave Chief Farley is what began his hostility towards me as he resented me for it.

Additionally, his accusations, which initially targeted a group of officers as the source of the department's unrest, and his subsequent decision to move 18 officers based on this beliefs are wholly contradictory. I, who has worked with him for over 20 years, has now become the focus of his baseless claims. It is once again nonsensical and illogical to accuse someone who had a longstanding relationship with him—someone he has

worked closely with him in his office—of instigating discord within the department. The transition from blaming officers to blaming his administrative aide (someone he has known for two decades) makes no logical sense, and the inconsistency of these accusations, casts doubt on their validity.

Furthermore, his claims that I attacked Police Commissioner Allen Pascual are equally without merit. Commissioner Pascual has been a supportive figure for me, personally and professionally. He has been exceptionally kind to me throughout my career, offering consistent support and encouragement. I hold Commissioner Pascual in the highest regard, and it is difficult to fathom why I would seek to undermine someone who has openly declared his support for my promotion. In fact, Commissioner Pascual has directly told me, “I am your biggest supporter for January,” referring to the promotion to Captain. It would be utterly irrational for me to take any action against the Commissioner, given the positive and supportive relationship that I shared.

I have no motive to undermine his position or the position of the Commissioner. The allegations are further undermined by the fact that I am focused solely on my promotion to the rank of Captain. There is currently an open position, and I rank #1 on the eligibility list. Therefore, it makes no sense for me to jeopardize my career or reputation by engaging in any actions that would endanger my promotion.

It is also important to note that I stand to gain nothing from his departure as Chief. However, his actions—specifically his change to the department’s ordinance that eliminated a Deputy Chief position—could benefit other officers within the department, as there would be an open Chief position, as well as potentially one or two Deputy Chief positions if he left abruptly. It is telling that others who would benefit from his departure have not been targeted by these accusations.

Another false narrative being spread by Chief Farley is that I am unhappy with the distribution of off-duty details. In fact, I have never requested more than one off-duty

detail per week since the discord began. I am in a solid financial position and I have no need for additional details. This can be confirmed by Lt. Michael Vitali, who is in charge of distributing off-duty details. I have consistently asked for no more than one detail per week on my day off, and there has been no issue with the current distribution.

Additionally, his actions at the recent union meeting and Deputy Chief Corbisiero's email have exacerbated the situation. He openly stated at the meeting how these OPRA requests are "bothering" him and "tarnishing" his legacy. This public statement, along with Deputy Chief Corbisiero's department wide email that highlighted and brought attention to the OPRA requests, has only served to amplify the issue further. By doing so, he has only given the individuals behind the requests a reason to continue their actions, rather than addressing the matter calmly and without further escalation.

Furthermore, please accept this memorandum as my formal complaint regarding the continuous harassment I have experienced from Chief Robert Farley. Chief Farley has fostered a workplace environment characterized by inappropriate behavior and so-called "practical jokes" that are demeaning, demoralizing, and targeted. These actions not only fail to meet the standards of professional conduct but also appear intended to humiliate me and other victims.

Specific incidents of misconduct by Chief Farley include:

1. Inappropriate and Indecent Behavior

- On multiple occasions, Chief Farley has exited the bathroom in his office and exposed himself to others in the room, making inappropriate comments such as, "Hey, look, it's bigger than you thought, right?"
- Chief Farley has, on several occasions, pulled his pants down and defecated on the floor in front of his entire office staff.
- During a cleanup of his former office, Chief Farley defecated in a trash can in front of Special Captain Derin and me. He left the feces in the trash can for

Captain Montero to find after moving into the office. Only after persistent urging from Special Captain Derin and me did Chief Farley eventually agree to clean it up days later.

- He has also left feces on the bathroom floor, apparently with the intent of having someone unknowingly step on it.

2. Vandalism and Damage to Property

- Chief Farley has deliberately damaged officers' personal property by breaking pens and smearing ink on uniforms, vehicle door handles, and office equipment, leaving officers with ruined clothing and ink-stained faces.
- He has placed spray paint cans under officers' vehicles, causing paint explosions when driven over. One such incident involved Officer Mejia's new Chevy Camaro, requiring professional detailing to repair.

3. Destructive Outbursts and Property Damage

- Chief Farley has gone into rages where he smashes items in the office.
- These outbursts include ripping a television off the wall and smashing it on the ground, throwing staplers across the room, smashing picture frames on the walls, and breaking glass that scatters across the office.
- On several occasions, he has thrown eggs in fits of anger, creating additional messes for staff to clean up.

4. Harassment Extending to Families

- My family has been subjected to harassment through the delivery of inappropriate items such as gay pride flags, dildos, and masturbation cream to my home. These items, which were opened by my wife and seen by my children, have caused unnecessary distress. Chief Farley has sent these items to other Officer's homes as well.
- Based on available evidence, these items can likely be traced to Chief Farley's or his wife's Amazon account, further demonstrating the deliberate and personal nature of this harassment.

5. Mistreatment of Cleaning Staff

- Chief Farley has deliberately defecated on the inside of toilet bowls in such a way that they cannot be flushed, leaving the cleaning staff, including Ms. Iris Burjos, to clean the mess. Ms. Burjos has personally expressed to me her frustration and disgust with this behavior, stating that it is neither funny nor appropriate.

6. Health and Safety Hazards

- Chief Farley has a pattern of placing dangerously hot peppers in officers' food and heating them in the office microwave, releasing fumes that have caused physical harm. One such incident caused Lt. Moyano to become ill and require EMS treatment. Additionally, fumes spread through the ventilation system, forcing the State Police team working on alcotest machines to leave the building. Chief Farley instructed everyone to report the incident as a malfunctioning pepper spray canister in the armory if anyone asked.
- Chief Farley has also tampered with office coffee by adding prescription medications such as Adderall and Viagra, causing staff to inadvertently experience the effects of these substances without their consent. In One incident he poisoned Corporal Tatarrani's fish with medication causing them all to die. This behavior is not only unethical but poses significant health risks.

7. Disrespect Toward Former Chief Fasilis

- Chief Farley has also engaged in behavior that disrespected former Chief Fasilis, including heating hot peppers in the office microwave in order to annoy him, causing fumes that filled the office and cause him discomfort which use to upset him greatly.
- Additionally, he poked holes in Chief Fasilis's coffee cup, causing coffee to spill and ruin a new suit once, which caused Chief Fasilis to become very upset.

8. Shaving his body hair and leaving it all over Officer's desk and personal property.

9. Jabbing Special Captain Derin in his penis with a hypodermic needle.

10. Hiding a Ghost Pepper in a burger that my 1 year old son was eating making him very ill in front of Captain Queiro, Sgt. Ortiz and Officer Jaloudi.

Although it has been incredibly frustrating and demoralizing to endure Chief Farley spreading baseless and unproven rumors that I filed anonymous OPRA requests against him—which I categorically deny—I must admit that the reassignment from his office has provided some relief. It is refreshing not to have to step into the bathroom and cringe in fear that I may step on human feces because I forgot to check the floor.

I had made multiple attempts to resolve this situation amicably with Chief Farley by requesting a meeting to address these issues directly. I have reached out through personal communications, the union president, and a formal work email. Unfortunately, all of these requests have been ignored or outright refused by Chief Farley. Despite my efforts to find a constructive resolution, his damaging conduct has persisted, leaving me with no other option but to file this formal complaint and lawsuit.

It is deeply troubling to think that the individual who conducts himself in such an unprofessional and inappropriate manner is the same person passing judgment on my character and attempting to derail the remainder of my career. This is a person who, despite his behavior, believes he is qualified to make critical and logical decisions about me, all while providing no evidence to support his accusation.

I have photos documenting many of these incidents as evidence, which I am prepared to provide during the course of any investigation. These actions are not only unprofessional but have created a hostile work environment that undermines morale and safety. This behavior must stop immediately.

I intend to call upon multiple witnesses who can corroborate these incidents and will fully cooperate with any investigation. I urge prompt action to address this matter and restore a respectful and professional workplace environment.

I would also like to formally advise you that I am currently cooperating with the Attorney General's Office in an investigation concerning police corruption.

It has become evident that there have been deliberate efforts to conspire against me in an attempt to undermine my civil lawsuit. These efforts have included attempts to intimidate witnesses, such as Special Captain Michael Derin, who was terminated after refusing to provide false information to independent counsel during questioning. Prior to his interview with independent counsel, Special Captain Derin was told that he should "remember his son works here" before giving his testimony — a clear attempt at intimidation.

Like I mentioned before I also caught Chief Farley and Captain Queiro backdating a police report, which I believe was done to make the report appear to fall within the required 45-day internal affairs timeframe. I can provide evidence to support this claim, and all related information has been submitted to independent counsel. Falsifying government records is a crime in New Jersey under N.J.S.A. 2C:21-4.

I have also witnessed crimes and cover-ups that I will reveal at a later time.

I would like to mention One notable incident involving Chief Farley meeting with an individual (witness) for lunch and asking if filing criminal charges against me could improve his own position in the civil lawsuit I have filed against him. This attempt to manipulate the legal process for personal gain is deeply unethical and highly inappropriate. The individual immediately contacted Special Captain Michael Derin to report the incident, stating that while he preferred to remain uninvolved, he would cooperate if questioned. This information has also been turned over to the Attorney General's Office.

I am deeply concerned that Chief Farley may go to extreme lengths, including engaging in criminal behavior such as backdating reports, intimidating witnesses, or fabricating charges against his adversaries, to protect himself from legal consequences.

Furthermore, Chief Farley has retaliated against Officer Syiam R. and Officer Bowen solely due to their association with me. Both officers have been repeatedly moved from squad to squad in what appears to be an intentional effort to cause hardship for me through them.

This pattern of behavior is highly troubling and must cease immediately. I expect no further retaliation following this disclosure (Cepa Laws), and I trust that this matter will be handled appropriately to ensure accountability and integrity within the department.

Sincerely,

Lt. Alex Guzman