

15-2752
MAS/TEA
RECEIVED

RANDY BAADHIO,
Plaintiff,

v.

BRIAN HOFACKER, DETECTIVE, MTPD
SEAN SULLIVAN, POLICE OFFICER, MTPD
ROBERT PALMER, CHIEF OF POLICE, MTPD
CHRISTINE MADRID, MAYOR, MONTGOMERY TOWNSHIP
VALERIE MELUSKEY, LANDLORD
JOSEPH MCGOVERN, P.O. NJSPB
MATTHEW AMBROSINO, SGT. NJSPB
JAMES DICKINSON, LT. NJSPB
MONICA BRAUN, P.O. NJSPB
TIMOTHY BRUEY, P.O. NJSPB
CRAIG SCHINDEWOLF, DIR. JSPB REVOCATION UNIT
MARTIN PEROTTA, H.O. NJSPB
DOUGLAS CHIESA, ATTORNEY, NJSPB
GREGORY EMBLEY, H.O. NJSPB
LENNY WARD, DIR. COMMUNITY PROGRAMS, NJSPB
JAMES PLOUSIS, CHAIRMAN, NJSPB
BRAIN BUTCH, ASSOC. BOARD MEMBER, NJSPB
JULIO MARENCO, ASSOC. BOARD MEMBER, NJSPB
CUNNINGHAM, P.O. NJSPB
ARBITELL, P.O. NJSPB
JOSEPH BOCCHINI, FORMER DISTRICT ATTORNEY, MERCER CO.
ANGELO ONOFRI, DISTRICT ATTORNEY, MERCER COUNTY
JOHN HOFFMAN, ATTORNEY GENERAL, NEW JERSEY
NURSE SINCLAIR, ST. FRANCIS HOSPITAL
SAINT FRANCIS HOSPITAL, TRENTON, NEW JERSEY
ANDREW LA RUE, P.O. NJSPB
EDWARD "EDDIE" COLLINS, P.O. NJSPB
BARBARA FRANTA, NJSPB
MCGOWAN, H.O. NJSPB
REBECCA HILTNER, NJSPB
COMMUNITY EDUCATION CENTERS (CEC),
Defendants.

APR 20 2015

AT 8:30 M
WILLIAM T. WALSH
CLERK

COMPLAINT

The Plaintiff, Randy Baadhio, moves the court for entry of judgment in his favor against the above named defendants, and in support of such Complaint avers as follows:

NATURE OF ACTION AND JURISDICTION

This is a civil action under 42 USC 1983 seeking damages, special redress, and injunctive relief against Defendants for committing acts, under color of law, with the intent, and for the purpose of depriving Plaintiff of rights secured under the Constitution and laws of the United States; for conspiring to deprive Plaintiff of said rights; for active participation in these violations, and for refusing or neglecting to prevent such constitutional rights deprivation to Plaintiff.

This case arises under the framework of the United States Constitution, protection afforded by the Constitution thereof, and 42 USC, Sections 1983 and 1988, as amended. This Court has jurisdiction in this matter, pursuant to 28 USC Sections 1331 and 1343. The declaratory and injunctive relief sought is authorized by 28 USC, Sections 2201 and 2202, 42 USC Sections 1983, and Rule 57 of the Federal Rules of Civil Procedure. Defendants are sued in their official and personal capacities.

Plaintiff brings this action resulting from the wonton infliction of significant hardship, pain and suffering, incurred due to Defendants actions, over a period of a year or so. They are briefly summarized as a sham, para judicial term of Parole, which served as a basis for a May 8th 2014 arbitrary arrest which led to a 10 months incarceration; a forced, unlawful eviction by Montgomery Township detective Brian Hofacker with implicit assistance from state parole board actors, two federal agents, the landlord, police officer Sean Sullivan; resulting homelessness; a brutal beating while restrained and handcuffed in the emergency room, St. Francis Hospital, on May 8th 2014 by Monica Braun in full view of nurse Sinclair; the subsequent filing of fraudulent criminal assault charges by Braun, acting on instructions from her commanding officers, Sgt. Matthew Ambrosino and Lt. James Dickinson; deprivation of due process rights in confronting witnesses and in NJSPB execution of a speedy probable cause hearing which increased incarceration length. These are but a sample.

In sum, this is an action for: failure by state authorities (the Attorney General) to prevent a conspiracy to deprive Plaintiff of federally protected rights; arbitrary and unlawful arrest by state actors, acting under color of law; unlawful imprisonment also by Defendants acting under color of law; illegal eviction without a Court Order, under threat of imminent arrest and manufactured charges by Police Detective Brian Hofacker et al, again acting under color of law; numerous invasion of privacy; assault, battery, attempted murder, the filing of fraudulent criminal charges against Plaintiff, conspiracy to cover up the vicious beatings Plaintiff was subjected to as retaliation and coercion by some Defendants herein; malicious prosecution by state officials as a result of the filing of fraudulent charges, namely the Mercer County District Attorney Office; the wonton

imposition of cruel and unusual punishment; the intentional and negligent infliction of emotional distress.

Defendants' acts as shown herein by supporting evidence, were made willfully, they willfully conspired to deprive Plaintiff of rights secured under the Constitution and laws of the United States of America. The deprivations in question derived from rights procured citizen under the 4th, 5th, 6th, 8th, and 14th amendments to the US Constitution.

This Court is an appropriate venue for this cause of action, pursuant to 28 USC 1391(b)(1) and (b)(2). The actions complained of, originated and took place in this judicial district; evidence and relevant records supporting Plaintiffs allegations and charges are maintained in this judicial district, within the confines of the State Governor Office, the State Attorney General Office, the New Jersey State Parole Board Offices, the New Jersey department of Corrections offices, the Montgomery Township municipality offices. Most of the Defendants and Plaintiff reside within the boundaries of the judicial district. The various agencies and executive offices, the Defendants, are present and conducts official affairs in the judicial district.

PARTIES

Plaintiff **Randy Baadhio** is a former university professor of Physics and Mathematics. Residing currently in Mercer County, NJ, he conduct research on fundamental quantum physics centered on Time as a subset or manifestation of energy on or immediately before the Cosmos birth, the role black hole play in separating space and time and in shaping the Universe(s). He is also actively engaged in a research program bridging physics with biology, a new field known as Quantum Biology, to which he has contributed much recently. Finally, he is providing specialized scientific consultations to certain government agencies.

Brian Hofacker, a detective with the Montgomery Township Police Department, is a Defendant. While Plaintiff was in intensive care at the Princeton Hospital from February 08th to the 11th, he initiated a series of phone calls with the State Parole Board and Karen Merrigan of the US Probation Office, Trenton. He made no secret of wanting to remove me, illegally, out of my lawful residence, 20A Andover Circle. Then Parole Officer McGovern resisted his entreaties and made a note stating so in the attached exhibit. When it became clear NJSPB will not knowingly take on a leading role in my unlawful eviction, Hofacker turned to Merrigan. On February 12th, 2014 just 9 hours from discharge from the Hospital, in presence of Merrigan, a colleague of hers, and the landlady, one Valerie Meluskey, Hofacker barged into my room, prevented me with Merrigan and colleague to place any call, threatened to arrest me on the spot for passing two "bad" rent checks, and asked that I packed up light and immediately vacate the premises. In recorded conversations, in my room, in the house, and later in phone conversations between us two, Hofacker can be heard in a sickening voice, ordering me to turn over my house keys, to not ever come back, telling the landlord to lock up the place (attached email exhibits); and that she will keep the \$900 deposit. It is telling that Hofacker running the local police benevolent association, raised \$25,000 for a scholarship for the memory of a deceased daughter of a retired colleague, who succumbed to Leukemia. All the while evicting by force and threat of imminent harm, a disabled, leukemia stricken patient just hours from a 4 days hospitalization. Hofacker

coolly went two days after the eviction on vacation in Cancun Mexico, while I awaited his return to obtain my hospital, FedEx shipped compound cancer medications for over a week. They were finally delivered by Merrigan.

Sean Sullivan on orders from Hofacker, played an active role in shoring up the landlord, dictating terms of return of my property that must be done while they were present (see attached landlord emails as exhibits). He especially called me in person one Saturday after I emailed the landlord seeking to go home and grab my orthopedic polio shoes, my glucose monitor, and some medications. As I write this a year later, I have yet to come into possession of them and it appear the landlord may have gotten rid of them. Sullivan indicated in recorded phone conversations and independently via the landlord that I was not to set foot in the house, even though I was not the subject of a lawful, court ordered eviction notice, let alone an order.

The Montgomery Police Chief, **Robert Palmer**, and the Montgomery Mayor, **Christine Madrid** are Defendants on behalf of the Montgomery Township municipality. As executives of the police department, Chief Palmer has a responsibility, under federal laws and state laws, to ensure his officers adhere to the highest professional and ethical standards. The evidence, gathered thus far, shows Hofacker to be anything but a corrupt police officer with a long history of troubles and ethical violations. As such, he should not have been promoted and put in a position of significant responsibility and authority. Moreover, after I notified the US Justice Department, and even after it has undertaken a criminal investigation of the matter, it appears that the Montgomery Police Department has done little to root out corruption and unlawful practices by its officers. Witness the department notifying state officials it has undertaken an internal affair investigation ... without ever, as much as interviewing me, the victim.

Similarly, the mayor, Christine Madrid has direct responsibility in overseeing the hiring of public officials in that municipality; in supervising them so that they further adhere to the spirit and letter of the law, and discharge their duties with the highest ethical, lawful, and professional standards. They have failed, and miserably at that, with deadly consequences.

Valerie Meluskey, the landlord, is a Defendant who conspired with Hofacker et al. to illegally and forcefully evict me from my lawful place of residence. She did so without ever lodging a complaint against me in Court, without ever as much as securing a court ordered eviction. Moreover, she rented the room in violation of numerous state and federal laws, and Hofacker could not have failed to notice, as a "detective" that she lacked the most basic of certifications required of landlords by the municipality of Montgomery and by state laws. Meluskey further violated the covenant of her housing association which prohibits renting for short term; additional tenant rights violation are noted below. None of these could have escaped Hofacker, the Montgomery Police Department. Yet, in an almost racist bent, they went on to ignore red flags, though these have been raised numerous time over 15 she illegally operated as a non-certified landlord, by renters and neighbors, and in effect declined to hold her criminally responsible. Meluskey, a vocal hypocrite, is further charged with Hofacker et al, of denial (and theft) of life basic necessities, of robbing Plaintiff of shelter and housing, of homelessness, of theft of property, of denial of access to healthcare and treatment.

Parole Officer **Joseph McGovern** is a Defendant. After resisting Hofacker "eviction order" against me, he nevertheless, with the Parole Board, conspired in the eviction by coordinating with Merrigan and Hofacker. NJSPB the subject of a federal investigation on para judicial sentencing, the lodging of false criminal charges, detainers and court bench warrants, took a back seat to Plaintiff eviction. Thus even though McGovern on paper declined to force me to leave my lawful place of residence, he never the less was kept up to the minute to the eviction scheme and proceedings. Attached is an entry he wrote, stating Merrigan advised him she and her colleague picked me up at the Hospital on the 12th of February, 2014 and brought me home only to pack me up and drive me to a motel in Trenton. The evidence of course is quite different. I returned home, discharged, on February 11th, and around 11 pm, notified Merrigan by text message, along with McGovern. Thus there is no factual debate as to the fact Merrigan showed up with Hofacker and her colleague on the 12th around 9 am. I was never advised of the scheme to remove me forcefully from the residence, and this is exactly what happened as my video cam and phone recorded the confrontation in my room with the parties herein.

Matthew Ambrosino, a Sergeant with the New Jersey State Parole Board. Of all the Defendants herein, he is perhaps the one who has inflicted the majority of the 8th Amendment claims stated herein. He has further played a significant role in attempting to silence Plaintiff in notifying federal authorities and the US District Court of the eviction and related abuses. Ambrosino took upon himself, on orders from higher ups, to essentially obstruct justice, to coerce me into dropping legal pleadings and petitions. To achieve this, he overrode his own officer assigned to "supervise" me and declared problems where none existed. Ambrosino went further, decreed a legal pleading, a complaint about the eviction to the Superior Court of Somerset County, something covered by First Amendment right to free speech and by Citizen Rights to petition the government and the Courts, was "a perceived threat to law enforcement".

As a result, he decreed I must attend to "counseling". His decisions led to the issuance, by Lt. James Dickinson, of an arrest warrant, verbatim stating "reasons" for my arrest "Mr. Baadhio is a danger to himself and to others because of his writings". This led to a 10 months incarceration for "parole violation". Ambrosino, in the few encounters we had, appeared seriously unbalanced and grandiose. A delusional megalomaniac with little regard for the rule of law, for professional ethics, human dignity, and human rights. As such, he represents the absolute worst of NJSPB culture of abuse of power, and deviant culture of corruption.

According to Monica Braun, in her written "Incident Report", he ordered her after the hospital assault, to press fraudulent criminal charges, a representation he is now distancing himself from, as expected, because of an ongoing federal criminal investigation. This in one snippet summarize Ambrosino complex and flawed human nature: eager to display and abuse power, to lie and cheat in the process, to use subordinates to execute wrongs while hiding under a "supervisory" role and authority; ambitious to the extreme; then just as scrutiny and accountability arises, quick to deny and snitch. Anything not to go to prison. Prisons however is replete with the likes of Ambrosino. I have met quite a few.

Ambrosino further played a central role in the forced residency at Logan Hall, which resulted in medical distress and hospitalization, something he eagerly did without

authority, and despite obvious evidence I declined to go in writing to Chairman Plousis. Finally, he and NJSPB higher ups, declined to honor NJSPB written promise of placement, adding to additional hardship.

In the few face to face interactions we had, I found Ambrosino to be demented. He actually had the temerity to tell me I believe to be above the law, while for over now 4 years, flat out refused to look at the obvious evidence of a sham parole term, to begin with.

He further stated I must be nice to them to obtain just about anything, such as an investigation into the para judicial sham parole term, or the written promised placement by NJSPB. In other word, he cannot foresee, nor admit to a reality, in which he is in the wrong and in a position of weakness.

I picture Ambrosino as Napoleon 21th Century knock off, below, shooting a pesky mosquito with his state issued 45 Magnum, watching puzzled as the mosquito happily ride the bullet high up in the sky unscathed, and Ambrosino saying "Voila! Après le deluge c'est moi!" (There, there, after the flood, all is me and about me".) Can he figure out the laws of kinetic theory and surface tension to work out why the mosquito was not hurt by his magnificent 45 Magnum bullet? I apologized to the Court for my foray into humor, but if I don't laugh at my misfortune at their hands, I will go crazy!



James Dickinson, a lieutenant of NJSPB issued an arrest warrant for “parole violation” on May 07, 2014, which he knew to be factually fraudulent in his representation. He therefore made the assertion willfully, with the specific intent to effect an arbitrary arrest and unconstitutional incarceration of 10 months. He must be held accountable for lying, the subsequent arbitrary arrest and all the constitutional deprivations that followed, including Monica Braun vicious beatings on arrest day, May 8, 2014, the false prosecution, the intentional and negligent infliction of emotional distress. He also declined placement and violated numerous additional laws. I believe he is unfit to hold any law enforcement function, and as with Ambrosino et al., I am determined to see that

he is permanently removed from such, and forbidden to ever have such an opportunity in the future, lest he goes on to hurt hapless victims.

Monica Braun admits to assaulting Plaintiff, on May 08th, 2014 while he was restrained, in bed, at the emergency room, St. Francis Hospital. She went on to file a truly stupid "aggravated assault charges against law enforcement" that did not stand a modicum of scrutiny. In the incident report, full of fabrications, she claimed I attempted to remove my IV line, an impossibility even without restrain as it is tape shut, often requires more than 2 hands to remove. She further claimed she attempted to stop me in part because of blood spilling up. This too is absurd as anyone who has been stuck with a needle knows. Furthermore, state laws, especially state law enforcement codes, forbid officers to intervene in medical situations; rather to call on medical staff. NJSPB in fact has such a policy in place. Braun represented I scratched her and twisted her arm. That too is impossible, for, on arrest day, a clearly happy and exalted Ambrosino, happily videotape the arrest. They show, upon handcuffing me, that I did not have fingernails (I distinctly recall cutting them the day prior), and for someone as heavily restricted by handcuffs and stomach belt as I was.

Braun fraudulent charges exhibits precisely the pattern and degree of police corruption, abuse of power, in vogue within New Jersey law enforcement community, with full protection of the State Attorney General. It is a continuation of the sham parole term, of the participation in the illegal eviction, of Ambrosino attempts to stop me from exposing the systemic crimes, of James Dickinson issuance of a factually fraudulent arrest warrant. Braun actions will lead to significant 8th Amendment claims, to 4th, 5th, 6th, and 14th amendment deprivations. Witness for instance the state never as much as arraigning me on the charges in municipal court, providing an attorney for which I qualified, only to suddenly spring up with a "grand jury indictment", then reversing course and attempting to squash the case once they learned of the involvement of the US Justice Department. The failure of state authorities to go after Braun, Bruey, and Ambrosino et al. is perhaps the most significant telltale characteristic of rogue state actors enjoying the protection of the state Attorney General. The Mercer District Attorney cannot be allowed to get away with such wonton disregard for the rule of the law and due process.

Craig Schindewolf, the NJSPB director of Parole Revocation, along with **Gregory Embley**, a hearing officer, **Martin Perotta**, another hearing officer, **Lenny Ward**, NJSPB Director of Community Programs, are Defendants for their extensive role in the constitutional deprivations alleged herein. Specifically, their actions, taken independently or in unison, led to a 10 months incarceration, to a "referral" to Logan Hall's CEC and to denial of placement for housing. Most of these actions have been centered on legal representation, on declining to produce the necessary due process discoveries, to hold hearings within a 60 days period, as per state laws, to have attempted to hold hearing without ever notifying Plaintiff, to deny unilaterally witnesses requested, to deny an attorney, and to refuse to take into account rebuttals as mandated by state laws. Lenny Ward in particular attempted to resort to trickery to make me sign a community program participation. Despite written refusal mailed to Parole Chairman Plousis, Ward and the Board via Ambrosino forcefully took me to Logan Hall, which resulted in hospitalization.

Thus, we are holding yet again, Board Chairman **James Plousis**, Board Associate Members, **Brian Butch**, **Julio Marengo**, and NJSPB Counsel **Douglas Chiesa**, as Defendants, precisely for the reasons stated above. At a minimum, Plousis et al must have answered my written refusal to go to Logan Hall. To say nothing of state laws, mandating he takes the claims of medical hardship and impossibility to attend seriously and act on them. Moreover, even with signs of a criminal investigation by DOJ closing in, numerous requests to Plousis to redress the sham, para judicial parole term of 1790 days by effectively canceling the remaining parole term went unanswered. In fact everything I ever sent Plousis and the Board was never acted upon, once they realized, in 2012, that this will not be an easy walk in the park, as it had of other defenseless para judicial victims of NJSPB. They simply went into a proactive silence mode, as though this is to confer them any protection against a future prosecution. Quite the contrary in fact. The Board Chairman, members, counsels and officials refusal to acts on the wrongdoings and crimes directly contributed to the constitutional deprivations alleged herein.

Timothy Bruey, a Senior Parole Officer, with **Cunningham**, **Arbitell** and a few others, is responsible for a great deal of the constitutional deprivations alleged in this Complaint. Assigned by Dickinson and Ambrosino as my "Parole" Officer, although he never formally reproached me of anything, nor to my knowledge participated in the conspiracy to evict me, he did however went along with Ambrosino attempts to coerce me, and to restrict my rights to free speech and to petition the Courts. As such he shares with Ambrosino responsibility in obstructing justice. Bruey, acting on orders from Ambrosino, forcefully, under threats of arrest, took me to Ambrosino for a sit down meeting at which while recorded, Ambrosino ranted and raved at my refusal to attend to "counseling" stemming from his "perceived threats to law enforcement" from my Pleading to Somerset Superior court. That forced meeting led to a missed a cancer treatment at Robert Woods Johnson Hospital in Hamilton. They refused to provide a ride to the hospital after I missed the medical van ride.

Bruey further significantly conspired with Braun, on arrest day, May 08, 2014, to "sanitize" her vicious assault. He did more, which led to a medical crisis later and a brief lapse into coma: when Nurse Sinclair, who witnessed Braun pummeling me, found him, he rushed in, picked up my broken glasses on the floor, and roughly ordered me to stand up and to leave the hospital. It was grave for at least two reasons: the medical staff was to evaluate me for the obvious bruises, bleeding of the mouth and gum, provide much needed medical care until I stabilized. Bruey actions prevented this. Second, one admitted to a hospital emergency room must be discharged. Third, disabled, paralyzed, and terminally ill, I was in need of a wheelchair, in fact the standard procedure is for hospital to wheel discharged patients to the waiting car. Bruey acts that day prevented all this and violated numerous state and federal laws.

What is more, in the car ride to the jail, I witnessed him and Braun conspired actively to commit the grave crime of manufacturing evidence: Braun parked in an empty lot nearby the District #6 Parole Office. She removed her black gloves; I then observed her scratching her left arm. Bruey then complied with her request to take pictures of the "wounds [I] inflicted", which later served as "evidence" by the Mercer County DA to secure a grand jury indictment.

Bruey rushing Plaintiff out of the hospital after vicious blows to the head, without medical attention, has significant adverse consequence just an hour or so later. On orders from Ambrosino, Brue and Braun rushed me to the Mercer County Jail. The nurses there immediately recognized the gravity of my medical conditions and made the decision, on the spot I am not eligible to be in jail, rather in the hospital. It was unprecedented. Thus Bruey and Braun consulted with Ambrosino who ordered them back to St Francis. I overheard Ambrosino say he will speak to a contact nurse there he knew well, to override the jail medical department. And this is exactly what took place. Returned to St. Francis, I was kept awaiting outside in the car with Braun, while Bruey, inside, obtained a medically fraudulent "clearance" to be jailed.

As I complained of headaches, dizziness, and respiratory distress, Braun coldly opened the car door and walked away to find the nurse in question. As we drove back toward the jail, my symptoms intensified, and overtook me. I asked Bruey and Braun to open the car windows so I could breathe. They refused. As I complained further, they laughed, taking great pleasure in my deteriorating stage. Unable to grasp for air and obviously in great pain and disoriented from the blows to my head, I finally collapsed. Only to be awoken 6 hours later in St Francis ER room and promptly discharged, then taken around 1 am to the same jail. The following day, a Friday, I was due for chemotherapy at Robert Woods Johnson Hospital, only of course to miss it and many more. Ambrosino, Bruey, Braun and St. Francis showed deliberate indifference to my medical condition, deliberately denied me treatment, and prevented me from obtaining such after Braun serious beatings. It is beyond factual dispute, as we will show at trial.

Thus, there is no factual dispute to the fact an assault by Braun took place in the hospital emergency room; that it was witnessed by nurse Sinclair; that Braun admitted as much; that she manufactured evidence and filed false charges with Bruey, Ambrosino and NJSPB active support; that they conspired to manufacture such fraudulent charges; further, that the Mercer County DA participated in the criminal conspiracy; that malicious prosecution occurred as a result; that further medical care was denied after the assault by combined actions of Bruey-Bran-Ambrosino and by St Francis Hospital; that further St Francis, via one of its nurse, issued a fraudulent medical clearance. That, in sum, 8th Amendment claims resulted and are one of the core basis of this Complaint.

For the reasons stated above, the then Mercer District Attorney, **Joseph Bocchini**, and the current one, **Angelo Onofri**, are named as Defendants, along with State Attorney General **John Hoffman**, for conspiring to deprive Plaintiff of rights secured under the 4th, 5th, 6th, 8th, and 14th Amendments to the Constitution. Together, they have engaged in malicious prosecution, wonton and willful, knowing full well Monica Braun charges to be utter fabrications. Hoffman received a number of letters from me, asking that he step in and investigate Braun-NJSPB crimes and the Mercer DA deliberate deprivation of constitutional rights. He declined. It is in fact grating that it took the Attorney General of the United States to do so. We expect state officials and moral leaders such as Hoffman to have done the right thing. Such failure to act is a profound betrayal. Even when notified of an investigation, a criminal referral for prosecution to the US Attorneys Executive Office, by no less than the US Attorney General, Eric Holder, these actors prodded on.

We are especially appalled by the denial of minimal due process rights, such as an arraignment in front of a magistrate judge, which have yet to occur, a year on after I was served with Braun charge; the denial of legal representation; ignoring requests I lodged in writing to attend pro se grand jury sessions. The Superior Court of Mercer County, in this matter, served as an appendage to the state law enforcement apparatus. Judge Counsel in particular, by refusing to as much as provide an attorney, seek answers for a lack of an arraignment in municipal court, by ignoring such, and a couple of motions I filed seeking legal representation among others, certainly put the Institution of the judiciary at the service of corrupt state officials, afforded them the opportunity to inflict constitutional deprivations, to pursue unsound, vengeance bent malicious prosecution, to inflict unnecessary emotional distress. It is shameful and beneath what we expect of an independent judiciary. I have asked the US Attorney General and the Senate Committee on the Judiciary to investigate this appalling, and frankly shocking breach of judicial etiquette and professional ethics.

John Hoffman is an entirely class in its own: in receipt of numerous complaint and issues raised often with evidence by me, he simply ignored all of them, never as much as answering any, as the law mandates. Refusing to answer allegations is however very different from refusing to act on them and at a bare minimum, investigate. Hoffman failed me, a victim of state abuses, time and again. He must be brought forward to answer why this was the case. Under 42 USC 1983, we can and certainly ought to hold him accountable.

Nurse Sinclair is a Defendant because although she witnessed the beatings by Braun and promptly informed Bruey, she did nothing to stop the subsequent cover up. In fact, according to notes from Bruey, she happily went ahead with the "IV removal" explanation for the assault by Braun. Furthermore, she remained oblivious to my pleas for medical assistance immediately following the beatings, even though it was obvious she saw Braun landing blows to my head and that I was bleeding from the face. Nurse Sinclair and the hospital undue familiarity and eagerness to do the bidding of state authorities, colored their judgement significantly, to the detriment of patients, to which their foremost loyalty is. Even before the assault, I observed with increased worries, as Bruey and NJSPB had a free range at the hospital, seemingly dictating terms of care to the staff. This is an area that is so prone for excesses and abuses, must have led to life and death issues prior and thereafter, deserving of scrutiny, that I notified the Health and Human Services Secretary, and requested that its OIG, and the Centers for Medicare and Medicaid (CMS) undertake a full- fledged investigation of the hospital.

St. Francis Hospital is named as a Defendant, for their deliberate indifference and failure to prevent the assault, for denial of treatment, before, and after, the assault, for providing substandard care, for refusing to contact my oncologist, for issuing medically fraudulent clearance to jail me, for disclosing medical information to NJSPB even after I verbally revoked such an authorization immediately following the assault. After Braun assault, I specifically demanded treatment and an evaluation of my brain functions. It was denied on the spot without notifying the doctor of the assault. When I refused to sign the "discharge" papers, this should have raised alarm bells and brought the doctor to me. Instead, Sinclair and the hospital ignored all procedures in effect by the American Hospital Associations and the American Medical Association.

Andrew LaRue, Edward "Eddie" Collins are Defendants as well. As my assigned "Parole Officers" from 2012 to 2013, they were keenly aware of the sham para judicial parole term. State laws mandates that when presented with evidence of a crime, they must investigate the matter and seek redress. They did absolutely nothing even though they are aware, from comments they made to Plaintiff, of NJSPB dirty secret: para judicial sham term of parole. The rationale used by them is that they have a "living to make [and so are doing] what [they] are told to do". Well, so did Hitler's, Mussolini, Stalin, Kim IL Sung, Mobutu loyal soldiers. That hardly excuse a crime, let alone the infliction of constitutional deprivations. If we cannot rely on law enforcement to confront criminal acts within their organization and rank, then how are we to expect them to uphold the law outside of it? We do not and should not, period. There is no place for hypocrisy in such instances where matters of life and death come to the fore. In part because of their lack of an official action aimed at investigating the sham para judicial sentence and term, these two actors had a direct role in the significant hardship Plaintiff lived and is still living. They must be held responsible just as the others.

Barbara Franta, the NJSPB Supervisor in Trenton State Prison, along with Hearing Officer **McGowan**, not only ignored obvious manufacturing of an extension of my sentence maximum date by Defendant **Rebecca Hiltner** and DOC, they in fact happily endorsed the criminal act and stated so in written official communication to me. McGowan in fact specifically computed in official NJSPB computation sheet prepared for the Parole Board, that I fully completed my sentence, at over 85% of custodial time served. As with LaRue and Collins, a simple investigation by McGowan and Franta would have revealed Hiltner manipulated, without authority and quite illegally my sentence. Therefore, we must hold them accountable and under 42 USC 1983, we do so by naming them as Defendants.

The **Community Education Centers (CEC)**, to which Logan Hall is a member, is a sprawling, politically well-connected corporate entity in New Jersey. Due to such political patronage, it has cornered and gobbled the "halfway house market". It has however always been dodged with significant stories of rampant corruption within its facilities, a matter profiles by Sam Dolnick in a series of articles in the New York Times. It is a testament to CEC connections that the state legislature was unable to as much as begin reforms. CEC facilities have been marked by FBI raids, such as in Trenton's Bo Robinson; by rapes; by rampant criminality from staff and residents. It claim to "treat addictive and criminal behavior", to provide a "healthy, drug free, safe and secure environment within which staff and residents provides and receive "treatment" and the "knowledge and skills necessary for a productive lifestyle prior to reintegration into society". CEC based its "treatment" portfolio on the unproven and often contradictory teachings of a prolific author and psychologist whose only claim to credentials in this field is to have "written 13 books" at last count. In my field of mathematical physics, a person writing more than 2 academics books is almost certainly a fraud: there is little doubt that the third book will be garbage as it is exceptionally hard to discover something so profound that will fill 2 books. In fact it is quite exceptional to write even one monograph.

For anyone walking within the halls of any CEC facilities, including Logan, CEC lofty mission statement does not square with reality. New Jersey and federal laws mandate such places be smoke free. And crime free. Walk however into the facility and you will be immediately overtaken by smoke and drug. Walk into the open bathroom and you

will see, in plain view of the staff, rampant drug usage and smoking. Stay by the living room area or any room and you will witness drug dealings going on. So what gives? For an organization claiming to "treat" addiction and criminal behavior, it is obvious it is a failure and a monumental one at that! CEC does not offer any "treatment" except to repeat nonsense; its "skills" consist of letting residents log into the internet or use the computer to compose personal letters. It is also a significant danger to someone like me, afflicted with Adenocarcinoma of the Lung (Lung cancer). Forcefully "placed" into Logan Hall by Ambrosino on orders from Brian Butch, Julio Marenco and Gregory Embley, I immediately suffered respiratory distress due to the smoke. For almost two weeks, the medical department "attempted" to "treat" me with oxygen, antibiotics, etc., to no avail. They were determined to keep me for commercial reason, as the resident doctor told me during a consultation. Even though I refused to sign the intake papers, CEC quickly made me a resident. Puzzled by what exactly they were going to "treat"—I do not smoke, drink, do drugs, and obviously a Ph.D. in Physics and a former University professor at Berkeley and Princeton, I certainly know how to write a resume or go hunting for a job, CEC could not say. Yet they politely asked me brazenly what it is that I "intended to work on" while there.

CEC residency led to significant medical hardship and pain and suffering for over two weeks. As a result, I was hospitalized nearby at Rutgers University in Newark, for 4 days in the pulmonology intensive care unit. The doctors found a new tumor in the left lung, which had to be monitored and excised via surgery soon. CEC is a monumental fraud, and a waste of taxpayer money. I am quite happy to name CEC as a Defendant, for infliction of 8th Amendment claims, for false imprisonment and containment, for taking in residents without proper medical evaluation and clearance; and when made aware of their conditions, of deliberately continuing to refuse to discharge them by asking they toughen up and continue the program. None of these actions are excusable and if CEC believe greed comes at the expenses of human rights then it is incumbent on us to teach them otherwise. We look forward in fat to taking CEC to task to explain to us and the taxpayers of New Jersey their success rate on "treatment".

At this juncture, we must recall that letters sent to Parole Chairman James Plousis advising him I refused to go to Logan Hall, precisely on medical grounds, were ignored. Moreover and this interesting, NJSPB and Gregory Embley in particular recommended Logan Hall with a "mental health component" because they found certain sentences in my Complaint to Somerset Superior Court to be "out of the ordinary". This somehow justified 90 to 180 days to imprisonment at Logan Hall, subjected to smoke, drugs, rampant criminality, and a healthy dose of daily nonsense "treatment". Although the Board made the referral to Logan Hall as a condition to secure housing, in his report Embley writes that a residency at Logan will "assist [me] with permanency in housing, than I otherwise not had [after the illegal eviction]", after taking me by force to Logan it is quite emblematic of NJSPB brazen arrogance that they renegaded on this portion of the deal, as promised in writing.

So in effect, we are back to the beginning, right? They evicted me, I became homeless, I filed a complaint in superior court, they claimed I needed to back off and "tone it down" (Ambrosino words, as recorded), I refused to compromise, they imprison me, declare I must reside in Logan Hall, obtain "counseling" and then be provided housing, only to refuse to honor their own commitment.

The injunctive motion attached is specifically designed to compel NJSPB to pay up for the housing. At a bare minimum it must be held to its written commitment and those officials who denied it held accountable under the law.

NARRATIVE AND STATEMENT OF THE FACTS

As noted in Dockets 3:15-cv-02444 (Writ of Habeas) and 15: cv-2599 MAS-LHG, state officials, from Governor Christie down on, engaged in systemic criminal acts which caught the attention of the United States Attorney General, who in December 03, and then 31, 2014, made two referrals for criminal prosecution to the Director, Executive Office, US Attorneys Office at DOJ Headquarters in Washington, DC. The nature of the alleged crimes are: para judicial sentencings, sham parole terms, arbitrary arrests and imprisonments, violation of the whistle blower act, threats and physical harm to a material witness, obstruction of justice, lodging of fraudulent superior court bench warrants and charges, lodging of detainers on the basis of fabricated charges, and without authority, the list goes on. Though the present pleading does not address these charges, they are nevertheless the background under which the complaint and allegations at hand arises, and they provide the context and motives for Defendants actions herein.

Plaintiff executed a valid lease for a month to month usage and enjoyment of a one room and the kitchen and house of Valerie Meluskey, at 20A Andover Circle, in Montgomery Township, New Jersey. Attached is the lease. It called for a 30 days notification of change by either party, a deposit of first and of last month, due upon the signing of the lease. On moving date, the terms of the Lease were met and the lease signed. Within minutes of arrival, Plaintiff learned the heat was not working and a furnace would be installed later. Of the three refrigerators in the house, he was allowed only one stack in the one parked in the garage. And of the 20 or so cabinets in the kitchen he was not provided with even a cabinet to store his products. The bed frame collapsed, only to reveal it has been taped shut with packaging tapes on two sides. Plaintiff suffered from significant back pain to the point he had to borrow three sofa futons to sleep on top of the bed.

On late January 2014, I notified Meluskey I will be moving out within a month. The issue we had then was the \$900 deposit. Signs were becoming increasing loud that she intended to find any reason to hold on to it. On February 06, 2014, Meluskey spilled a strong insect repellent liquid in the garage, right below my room and window. As a result of inhaling the fumes for days, affected with leukemia and Adenocarcinoma, I developed respiratory distress, and on February 08, 2014, I was taken by ambulance to the Princeton Hospital. For the duration of my stay there, I did not hear from Meluskey.

On February 08, 2014, while in the Princeton Hospital, I notified Karen Merrigan of the USPO of my hospitalization and whereabouts by text message. I received a strange text back, asking me what my place of residence was. It was all the more puzzling as Merrigan had previously visited me there. On Monday, February 09, 2014, I received, while in my hospital bed, a call from one Joseph McGovern of NJSPB. He indicated he was my temporary Parole Officer and just visited my residence, only to find out I was not there. It was disingenuous: McGovern, it later turned out, was contacted by Detective Hofacker who asked him and NJSPB to remove me, forcefully, and illegally,

from my residence. NJSPB, however, officially declined to take on a leading role, due to federal scrutiny. We now know both Ambrosino and James Dickinson have been consulted and knew of the conspiracy to evict me illegally. At no point in time did neither NJSPB Defendants notified Hofacker superiors, nor federal authorities. Hofacker contacted Karen Merrigan of USPO who readily agreed to the scheme.

A seasoned, careful, easygoing McGovern however made a protective move for the record, essentially "an umbrella entry" into my supervisory report, indicating Hofacker unlawful suggestion, and his rebuff, on behalf of NJSPB (attached). McGovern, on the phone asked that I report the "following Tuesday" even as I laid sickly with Leukemia and awaited surgery the next day.

That Monday, I also received a phone call from Karen Merrigan, advising me she will visit me at the Hospital the next day. A bit later, I was approached at the hospital by members of the intelligence community in Princeton, with whom I consulted with, who indicated there was lots of activities in 20A Andover and in my room. They took pictures of Hofacker visiting, of Merrigan meeting with Meluskey, of Hofacker entering my room without permission. It was clear something was amiss. They advised me to call the landlord, which I did, to no avail: she refused to take my calls.

Merrigan visited on Tuesday morning, while I was undergoing surgery for removal of tumors in the lungs and esophagus. We were thus unable to make contact. The record is however undisputable she did not inform me of anything about to transpire, nor did she consulted with me, nor asked if there was an issue with my landlord.

I was discharged late evening, on February 12, 2014. An ambulance with one intelligence agent friend riding took me back to 20A Andover. The landlord Meluskey opened the garage door to let us in, briefly met the intelligence agent who assured himself I was fine and noted her demeanor. I picked up McGovern "business card" and went to my room to rest.

The following morning, at roughly 9 am, as I was lying in bed with my laptop camera on recording mode, I was notified of Merrigan, a colleague of her, and Hofacker parking and entering the driveway of 20A Andover. The landlord met them and without her, Merrigan, her colleague, and Hofacker entered my room. Hofacker overly aggressive and demeaning, yelled that I wrote two bad rent checks. When I challenged him, he indicated he had subpoena the records from my bank. I asked him to produce the records. He declined. He advised me to pack up light and vacate the house immediately or he will arrest me on the spot. It is at this point that Merrigan took over, as I clearly hesitated. She stated that I must vacate the premises immediately and leave with her and her colleague or I will be taken into custody, on the spot. That in fact even if I vacated the premises, an arrest warrant was likely to be issued by Hofacker by day end. I asked to make a phone call, and was immediately rebuffed by all three, as they suspected I may contact a federal authority. However when I hesitated to leave stating I had no money and nowhere to go, they suggested I called friends.

When I stepped out to the bathroom to pick up some necessities, and came back to the room, I caught a movement of Hofacker, stealing without a warrant, handwritten papers I had left in my bed, which he put in his pocket. This was actually recorded. The camera showed Merrigan and colleague laughing, suppressing giggles, amused at what they

took for my stupidity and naivety. At one point Merrigan challenged my hospital stay, asking that I provide and show them on the spot, my discharge papers.

It is at this point that Merrigan stepped out of the room and called McGovern. I overheard her saying "We have Baadhio, we are leaving the house now. We are taking him out." McGovern made a note of the conversation, attached. In it, he writes that Merrigan informed him they had driven to the hospital, picked me up and drove me to my residence; after which I packed up my property and left with them. This is obviously a fallacy as the record is quite undisputable I was discharged the evening prior, and never voluntarily left my lawful place of residence. Hofacker, Merrigan, and colleague were recorded when we departed my room. Hofacker in particular was heard asking me for the house keys, telling Meluskey not to allow me back, to lock the house in, a point Meluskey reiterated in an email to me, attached. She made no secret in them of Hofacker role in the unlawful eviction, attached. Because I was rushed out of the house, I did not of course took with me a great deal: medications, my custom made polio shoes, my glucose monitor, and so on. I have yet to recover them over a year later.

Under instructions from federal agents, I draw Hofacker to a series of recorded phone conversations later that day at the Trenton Motel where Merrigan and colleague took me. It is truly sickening to listen to. To say that the man is sick is an understatement. In the conversations, Hofacker is heard telling me he did not have any documents from my bank, in effect that he lied to scare me and get me out of the house. He stated because I "voluntarily left the house" he saw no need to subpoena the Bank. He further told me the landlord will keep the \$900 deposit and admitted there was no case (the landlord, attached, later distanced herself from Hofacker, stating in an email she did not ask him to "resolve our dispute", nor "speak for me", nor given permission for Hofacker to do so. However, it is notable they both had the very same conditions: no charges, but "you left voluntary and I get to keep the \$900 deposit!").

When I told him I have not vacated the house, and in fact contacted the Department of Justice Special Litigation Section in Washington, DC, and the FBI in Newark, he stated emphatically "I did not tell you to move out. I did not evict you. You left voluntary." Yet read on exactly what happened (attached) when I attempted to return to take possession of my polio shoes, glucose monitor and other life basic necessities: the landlord made it explicit Hofacker must be present; that I am not allowed into the house per order of the Montgomery Police, a point in fact Officer Sean Sullivan reinforced in a recorded phone conversation with me, turned over to the DOJ. Hofacker departed for Cancun Mexico, where he happily posted updates in Facebook. One of the pictures was in fact at the Crocodile Farm, one of my favorite place in Cancun!

Hofacker duplicity and criminality is hard to fathom and accept. It is in fact a study in hypocrisy, abuse of power and narcissism, akin to Ambrosino's. Here is after all the President of the Montgomery Benevolent Police Association who, as I showed in 3:14-cv-2088 raised a cool \$25,000 for scholarship for a leukemia victim, but somehow, sees nothing wrong in evicting a leukemia patient, 9 hours from a hospital discharge, in the middle of the winter, and illegally at that! It is hard to reconcile. Then maybe not. Implicit in Hofacker (and Ambrosino and all others) actions is the belief that animalistic behavior such as these are justified because the other person is less of a human being, either because he happens to be black, of a different national or social strata, or else.

As I continued to correspond with Meluskey and elicited answers that implicated herself, Hofacker, the Police Department, I received a warning by email, from Karen Merrigan, advising me (attached) that "it would be in [my] best interest to end [my] letter/email writing campaign [to federal authorities] in this matter, to seize (sic she meant cease) contact with [my landlord]". Merrigan further threatened charges of harassment. As you read the email, you cannot escape this suffocating and nauseating sense of utter entitlement to abuse power, of absolute power over someone she is supervising, of conniving, and most of all a profound detachment to reality, the abject lack of responsibility for destroying lives and impacting such horrors and hardship on another human being, without even as much as an iota of empathy. It is truly nauseating. And scary.

As I declined and the actors became aware I notified federal authorities, tension rose. It cumulated with Ambrosino attempt to muzzle me by stating he read my complaint precisely addressed to the Somerset County Superior Court on the eviction. Ambrosino, in recorded conversations, turned over to federal authorities, never as much expressed an iota of sympathy for my situation. To the contrary they pressed on with even more demand: I was somehow less than a human, deeply scared of their authority and criminal behavior. It is at this juncture that James Dickinson issued his infamous arrest warrant of May 07, 2014, claiming I was a danger to myself and to others due to my writings. This resulted in a 10 months incarceration. Thus it is beyond factual dispute that Defendants violated the constitutional protections Plaintiff is afforded under the Bill of Rights: the 4th, 5th, 6th, 8th and 14th Amendments to the Constitution.

It is also, at this juncture, that Defendants Martin Perotta, Douglas Chiesa, Craig Schindewolf, Lenny Ward, Gregory Embrey et al. entered the picture. I documented in Habeas 3:11-cv-7120 how these actors went to great length to not hold a "parole revocation hearing" within the lawfully mandated 60 days. How they denied me legal representation; declined to provide discovery; ignored request to send the parole violation report to my attorney the ACLU of New Jersey; and, when after roughly 9 months of delay, a hearing occurred, they made no secret, in writing, to state they declined ALL witnesses I requested. Such due process violations derived from the 4th, 5th, 6th and 14th amendments are unacceptable. For this reason Plaintiff is determined to bring them to accountability.

On arrest day, May 08, 2014, while handcuffed, restrained, in a bed at the St. Francis Hospital Emergency Room, Braun took advantage of an arranged departure of Bruey to viciously land blows after blows on my face, stomach. She was caught in the act by Nurse Sinclair who instead of stopping her, actually ran away to ... you guess it get Bruey! How interested. Instead of sounding the alarm and call the nurses and doctors and check on the patient, she is actually running to the partner of the person beating Plaintiff up! Sinclair and the hospital action that day are simply inexcusable. They violate every conceivable canon of medical conduct and edicts. We will do well indeed to bring accountability to St. Francis. For this reason, I followed up with a request to the HHS Secretary. I launched a formal complaint and asked for an investigation and hefty federal penalties should culpability is established.

The United States Attorney General took upon himself to investigate Braun and state officials abject conduct. After months of investigation, he referred the matter to his Director, Executive Office, and US Attorneys.

As human beings, we carry the devoted and persistent characteristics of empathy, goodwill toward one another, and a desire not to inflict wonton harm upon others. These characteristics, are shared, of course, with most other mammals, our immediate cousins in the evolution tree. Reptilian characteristics, rooted in aggression, lack of empathy, absence of social interactions (witness a baby snake just born ignoring his mother and slithering away), is also part of our genetic and anatomical heritage. As humans and mammals, we inherited a reptilian brain, the hypothalamus. It is notable that it is the brain oldest organ; that further the brain evolved to have additional layers and organs which have made us so unique: among them, the cerebral cortex, and the most addition, the neocortex.

The conflict between these new organs and the oldest reptilian one has defined humanity, given root to our sense of morality, and set boundaries that have checked aggression and self-destruction of our species and the planet. Scientists such as myself, have known for decades these distinct organs within the brain do not speak well, nor collaborate well. Dreams are but the most celebrated manifestation of this dichotomy. So is depression and mental illnesses, and suicide (coincidentally remarkable that the suicide rate in human is roughly on par with that of stars, exploding supernovas and seemed, to a physicist anyway rooted in the law of conservation of entropy, a barrier to self-destruction). Still, resolutely engaged in our cosmic journey, reason, empathy, and love seem to have prevailed over aggression and self-annihilation. As decades and centuries wither away, the hypothalamus seemed to be losing its prominence. We talked more of diplomacy, set nuclear arms treaties, learn to involve reason and logic into highly emotionally charged conflicts, extend empathy to others by worrying about animals and the planet we are destroying, carry on assistance to other nations that have the misfortune to be poor and disease stricken. We have set, in institutions and in canon of laws, social norms of behavior that punish deviancy of the norms stated above.

Therefore, it is all the more shocking that the very persons charged with defending, and enforcing this norm of behavior, those that represent society and humanity best values, were in fact the very ones that inflicted the most punishment. Such a betrayal from law enforcement is hard to fathom, let alone accept. One of the images I shall never forget, and almost certainly would take to my grave, is that of Karen Merrigan, a person I would have trusted with my life, a person I deeply respected, and of her colleague, in the parking lot of the Ewing's PNC bank, laughing heartily at their prowess in play acting and in evicting me, barely half an hour early, as I exited their car and strode on unsteadily with my cane, the hospital tag still in my left arm, a not so distant 9 hours memory of a difficult 4 days intensive care hospitalization.

Have we been listening to our humanity, to all that is dear to us as humans, exemplified like no other one on Earth by Americans? Or rather, have we worked hard to suppress our humanity, to bring up the absolute worst in us, the reptilian characteristics that have taken us millions of years to shed?

CAUSES FOR ACTION

The totality of the above foregoing allegations are incorporated and reaffirmed in, and for the Counts below.

COUNT ONE

Constitutional and Civil Rights pursuant to 42 USC 1983, 1988. Violation of the 5th and 14th Amendment (Against All Defendants).

COUNT TWO

Constitutional and Civil Rights Pursuant to 42 USC 1983, 1988. Violation of the 6th Amendment. (Against All Defendants).

COUNT THREE

Constitutional and Civil Rights Pursuant to 42 USC 1983, 1988. Violation of the 8th Amendment. (Against All Defendants).

COUNT FOUR

Constitutional and Civil Rights Pursuant to 42 USC 1983, 1988. Violation of the First Amendment, Free Speech. (Against All Defendants, to the exception of Valerie Meluskey, the CEC, St. Francis Hospital and Nurse Sinclair).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Randy Baadhio, requests judgment against Defendants as follows:

1. For appropriate declaratory relief regarding the unlawful and unconstitutional acts and practices of Defendants;
2. For appropriate compensatory damages in an amount to be determined at trial;
3. For appropriate equitable relief against all Defendants as allowed by the Civil Rights Act of 1871, 42 USC Section 1983, including the enjoining and permanent restraining of these violations, such that the underlining crimes cease to affect Plaintiffs and other victims;
4. For an award of reasonable attorney's fees and his costs on his behalf expended as to such Defendants pursuant to the Civil Rights Act of 1871, 42 USC Section 1988;
5. For other such and further relief to which Plaintiff may show himself justly entitled;
6. For an emergency injunctive relief Order: returning the totality of the remaining property left at 20A Andover Circle, with Valerie Meluskey; dismissing Braun (and the Mercer DA) fabricated assault charges and the subsequent prosecution; ordering NJSPB and the state of New Jersey to provide immediate housing as per NJSPB written promises.

PLAINTIFF REQUESTS TRIAL BY JURY ON ALL ISSUES SO TRIABLE

MOTION TO PROCEED IN FORMA PAUPERIS

Plaintiff moves the Court to proceed in forma pauperis. (Plaintiff is indeed *II Pauperito*). An application is hereby appended to this Complaint.

MOTION FOR AN EMERGENCY HEARING

Plaintiff wishes to move the court for an emergency hearing aimed at compelling NJSPB and the State of New Jersey to fulfil their written commitment to provide "placement" housing immediately.

NOTES

Defendants, sued in their official capacities, will almost certainly attempt the defense of absolute (and qualified) immunity. Plaintiff therefore seek to address them if and when Defendants avail themselves of such defense.

Respectfully Submitted,



Randy Baadhio
213 Carnegie Center #3411,
Princeton, NJ 08543
rbaadhio@gmail.com
609-964-6664