
From: Taeho Kim <opra+request-12622-48d6886c@requests.opramachine.com>
Sent: Wednesday, May 27, 2020 5:18 PM
To: Town Clerk
Subject: OPRA request - OPRA: police officer-involved lawsuits 2012-2019

Dear Vernon Township,

This is a request for public records made under OPRA and the common law right of access. I am not required to fill out an official form. Please acknowledge receipt of this message.

Records requested:

1. A list of all lawsuits and cases in which any officer of the police department was involved between 2012 and 2019. For each lawsuit/case, please provide the date (month and year) of the alleged incident at issue, whether the alleged incident was excessive force, settlement amount (if any), and final compensation amount ruled (if any).
2. Please provide copies of the complaint in any lawsuits and cases described above.

Yours faithfully,

UC Research

Please use deliver records electronically via email to the below UNIQUE address for all replies to this request:
opra+request-12622-48d6886c@requests.opramachine.com

Is townclerk@vernontwp.com the wrong address for OPRA requests to Vernon Township? If so, please contact us using this form:
https://opramachine.com/change_request/new?body=vernon_township

Disclaimer: This message and any reply that you make will be published on the internet. Our privacy and copyright policies:
<https://opramachine.com/help/officers>

View this OPRA request & responses online:
https://opramachine.com/request/opra_police_officer_involved_law_224

Please note that in some cases publication of requests and responses will be delayed.

If you find this service useful as an OPRA custodian, please ask your web manager to link to us from your organisation's website.

#179
5-28-20
on or before 6/30/2020
AMH

ROBERT KOSCH, #817868A
Northern State Prison
P.O. Box 2300
Newark, New Jersey 07114
Plaintiff, pro se

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ROBERT KOSCH,

CASE NO. 2:12-cv-00781-FHS-PS

Plaintiff,

CIVIL ACTION

v.

CHARLES REID, individually
and in his representative
capacity as a police officer
employed by the Vernon Twp.;
JOHN DOES (1-10) and in
their representative
capacities employed by
Vernon Twp. and/or the
Sussex County Prosecutor's
Office,-----

MOTION TO PROCEED PRO SE,
SUBSTITUTING PLAINTIFF'S ATTORNEY,
ROBERT J. DE GROOT, ESQ.,
IN THIS MATTER

-----Defendants.

PLEASE TAKE NOTICE, that the undersigned Plaintiff, ROBERT KOSCH, pro se, hereby Moves before the United States District Court, District of New Jersey for an Order permitting Plaintiff to proceed as a self-represented litigant in this matter substituting trial counsel Robert J. DeGroot, Esq.

A Certification in Support of this Motion is attached here.

Date: 5/18/17

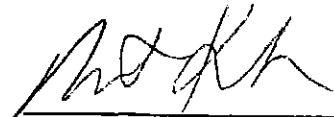

ROBERT KOSCH,
Plaintiff, pro se

on the subject properties involved in this Federal Civil Action.

The Certification also contains allegations of a continuing pattern of egregious misconduct by the defendants deliberately injuring the Plaintiff.

Date:

5/18/11



ROBERT KOSCH
Plaintiff, pro se

ROBERT KOSCH, #817868A
Northern State Prison
P.O. Box 2300
Newark, New Jersey 07114
Plaintiff, pro se

UNITED STATES DISTRICT COURT
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Vernon Twp. and/or the
Sussex County Prosecutor's
Office,

MOTION TO RETURN THIS
CASE TO THE COURT'S
CALENDAR AND REACTIVATE
THIS LAWSUIT

Defendants.

PLEASE TAKE NOTICE that the undersigned Plaintiff, pro se,
ROBERT KOSCH, hereby Moves before the United States District
Court, District of new Jersey, 50 Walnut Street, Newark, New
Jersey 07101, for an Order Granting Plaintiff's application
to re-instate this case returning it to the Court's calendar
after the Honorable Faith Hochberg, U.S.D.J., dismissed the
matter without prejudice from a Motion Filed by the Sussex County
Prosecutor's office requesting a stay of these proceedings until
after State criminal proceedings against Plaintiff terminated.

A Certification in Support of this Motion is attached hereto
detailing favorable termination of charges previously lodged
against Plaintiff for the alleged unlawful transfer of title

ROBERT KOSCH, #817868A
Northern State Prison
P.O. Box 2300
Newark, New Jersey 07114
Plaintiff, pro se

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ROBERT KOSCH,

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Vernon Twp. and/or the
Sussex County Prosecutor's
Office,

CERTIFICATION
OF
ROBERT KOSCH

Defendants.

I, ROBERT KOSCH, of full age, hereby certify as to the following:

1. I am the Plaintiff in the above captioned matter and am fully familiar with the facts of this case making me proper party to this Certification.

2. After the Filing of this Civil Complaint by the Plaintiff, Sussex County Assistant Prosecutor, Seanna Pappas Filed a Motion to Intervene pursuant to Fed. R. Civ. P. 24(b)(1)(B), on 2/7/13, for the limited purpose to request a stay of this civil proceeding until after the criminal charges pending against the Plaintiff were resolved in the state Courts.

3. In October of 2011, criminal complaints were Filed by the State of New Jersey, Sussex County for Theft by Deception, N.J.S.A. 2C:20-4, charging the Plaintiff with the unlawful transer of title by Plaintiff's company on certain homes within Vernon Township, Sussex County, New Jersey. Specifically, 8 Tanglewood drive, 13 Tanglewood Drive and 9 Kings Court between 6/2011 through September 2011.

4. The State then brought additional charges of Theft of Immoveable Property, N.J.S.A. 2C:20-3(b) in Sussex County Indictment #13-5-188, for the unlawful transfer of title for property located at 305 Hemlock Drive, Vernon, New Jersey which is the subject property mentioned in the original Civil Complaint here.

5. Theft and Burglary charges related to 9 Kings Court were dismissed by the State and not included in the aforementioned indictment for prosecution.

6. Plaintiff stood trial as the defendant in the State criminal case in September 2014, and was found not guilty by a jury for charges of unlawful Transfer of Interest, Forgery and Theft of Moveable Property in counts three, four and five related to the property located at 305 Hemlock Drive, Vernon, New Jersey.

7. Plaintiff, as the defendant in the State criminal charges, was found guilty for Theft of Immoveable Property in counts one and eight related to 8 Tanglewood Drive and 13 Tanglewood Drive, Vernon, New Jersey which were vacated by the Superior Court of New Jersey, Appellate Division finding no unlawful transfer of title on those homes in a published opinion dated March 1, 2016, State V Kosch, (App. Div. 2099-14T3).

8. Those vacated charges mentioned above are not the subject of any re-trial by the State of New Jersey, or negotiated guilty plea made subsequent to the appellate reversal.

9. The State charges which were the basis for the motion to intervene requesting a "stay in these proceedings", resulted in the Federal Court's decision to dismiss this case without prejudice and is no longer an issue which would prevent this case from moving forward.

10. Since the dismissal without prejudice in this Action, defendants Charles Reid of the Vernon township Police Department and Seanna Pappas of the Sussex County Prosecutor's office, along with John Doe defendants mentioned in this complaint have continued, and currently continue to injure the Plaintiff by acts of deliberate egregious misconduct.

11. Subsequent to the indictment of the Plaintiff as the defendant in the criminal case, Assistant Prosecutor, Seanna Pappas was removed from prosecuting this case by the New Jersey Attorney General's Office, together with confederate John Doe defendants employed by the Sussex County Prosecutor's office, (to be mentioned by name later if this Motion is Granted), for initiating a feigned "murder for hire plot" where State employees recruited confidential informant John Foley, outfitting him with a listening device, in a failed attempt to convince Plaintiff that he should pay Foley \$50,000.00 to kill prosecutor Pappas in order to interrupt, or terminate the prosecution of

the Plaintiff while housed together at the Sussex County Jail.

12. Plaintiff rejected the offer made by the informant while he wore the wire capturing Plaintiff's comments.

13. Plaintiff became aware of the above-mentioned ruse being perpetrated by the Sussex County Prosecutor's Office and sent a hand written letter (delivered by defendant's associate) in early June 2013, to the New Jersey Attorney General's Office, the Division of Criminal Justice, Administrative Office of the Courts of New Jersey, Gary Grant, Esq., Robert DeGroot, Esq. and others.

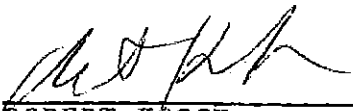
14. The New Jersey Attorney General named a special prosecutor to handle the criminal case as a result of the Plaintiff's discovery of the attempted scheme concocted by Sussex County selected from the Morris-Sussex Vicinage allowing continuing injury to the Plaintiff.

15. Subsequent to the dismissal of the Federal Civil Rights suit, Assistant Prosecutor, Pappas Motioned the State Court in April of 2013, to have Plaintiff's Attorney, Robert DeGroot removed from representing Plaintiff creating an illusion that he was a victim in the criminal case (Ind. 13-5-187) falsely charging that Plaintiff stole Mr. DeGroot's identity and used it in a bank transaction while directing a State grand jury proceeding.

16. Plaintiff intends to call Mr. DeGroot as a witness in this case thereby creating a conflict in any possible representation of Plaintiff in this matter.

17. I, ROBERT KOSCH, hereby certify that the above-mentioned statements made are true and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: 5/18/17


ROBERT KOSCH,
Plaintiff, pro se