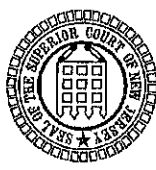
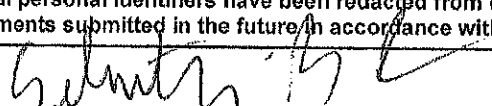


Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		FOR USE BY CLERK'S OFFICE ONLY		
			PAYMENT TYPE: ☐ CK ☐ CG ☐ CA		
			CHG/CK NO.		
			AMOUNT:		
				OVERPAYMENT:	
				BATCH NUMBER:	
ATTORNEY / PRO SE NAME Sebastian B. Ionno, Esquire		TELEPHONE NUMBER (856) 553-6810		COUNTY OF VENUE Essex	
FIRM NAME (if applicable)		DOCKET NUMBER (when available)			
OFFICE ADDRESS 140 South Broadway Suite 5 Pitman, NJ 08071		DOCUMENT TYPE COMPLAINT			
		JURY DEMAND ☒ Yes ☐ No			
NAME OF PARTY (e.g., John Doe, Plaintiff) JORDAN DESCAFANO		CAPTION DESCAFANO V. TOWNSHIP OF VERONA, et al.			
CASE TYPE NUMBER (See reverse side for listing) 618	HURRICANE SANDY RELATED? ☐ YES ☒ NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ☒ NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.			
RELATED CASES PENDING? ☐ YES ☒ NO		IF YES, LIST DOCKET NUMBERS			
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? ☐ YES ☒ NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) ☐ NONE ☒ UNKNOWN			
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.					
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION					
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? ☒ YES ☐ NO		IF YES, IS THAT RELATIONSHIP: ☒ EMPLOYER/EMPLOYEE ☐ FRIEND/NEIGHBOR ☐ OTHER (explain) ☐ FAMILIAL ☐ BUSINESS			
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? ☒ YES ☐ NO					
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION					
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? ☐ YES ☒ NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION			
WILL AN INTERPRETER BE NEEDED? ☐ YES ☒ NO		IF YES, FOR WHAT LANGUAGE?			
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule 1:38-7(b)</i> .					
ATTORNEY SIGNATURE:  11-15-17					

Side 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN | 292 PELVIC MESH/BARD |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 282 FOSAMAX | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 287 YAZ/YASMIN/OCELLA | 300 TALC-BASED BODY POWDERS |
| 289 REGLAN | 601 ASBESTOS |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA |
| 291 PELVIC MESH/GYNECARE | |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59

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ATTORNEYS FOR THE PLAINTIFF

JORDAN DESCAFANO, Plaintiffs, v. TOWNSHIP OF VERONA, LIEUTENANT MICHAEL RUGLIO, AND JOHN DOES 1-25 INCLUSIVE, FICTITIOUS NAMED DEFENDANTS, JOINTLY, SEVERALLY, AND IN THE ALTERNATIVE, Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – ESSEX COUNTY Docket No.: Civil Action COMPLAINT, DEMAND FOR JURY TRIAL, DESIGNATION OF TRIAL COUNSEL AND DEMAND PURSUANT TO RULE 1:4-8
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Plaintiff Jordan Descafano presently residing in Essex County, New Jersey, by way of
Complaint against Defendants, states:

FIRST COUNT

1. At all relevant times herein, Defendant Township of Verona (collectively referred to as “Defendant Verona”), was a public entity created and existing pursuant to law, doing business in the state of New Jersey and was the employer of Plaintiff through its Police Department (“the Department”).

2. At all relevant times herein, Defendant Michael Ruglio (“Defendant Ruglio”) was a Lieutenant with the Department and Plaintiff’s supervisor who unlawfully combined or acted in concert with Defendant Verona to engage in the unlawful and discriminatory and

retaliatory misconduct referred to herein, which occurred during and in the course and scope of his employment with Defendant Verona, which conduct is imputed to the employer/principal, Verona, as a result of Verona having authorized, ratified, condoned, acquiesced in, approved, tolerated, fomented, or aided and abetted the discriminatory misconduct referred to herein.

3. At all relevant times herein, Defendants Verona and Ruglio acted under color of law when they unlawfully combined or acted in concert with Verona to engage in the unlawful and discriminatory and retaliatory misconduct referred to herein, which occurred during and in the course and scope of Plaintiff's employment with the Department, which conduct is imputed to the employer/principal, Defendant Verona, as a result of Defendant Verona having authorized, ratified, condoned, acquiesced in, approved, tolerated, fomented, or aided and abetted the discriminatory misconduct referred to herein.

4. At all relevant times herein, Defendants John and Jane Does 1-25, inclusive, are fictitious names for persons, corporations, or other legal entities, the identities of which are unknown as present, but who are responsible to Plaintiff by reason of their knowing participation in the acts of wrongful termination, and retaliation with Defendant Verona and/or by reason of their aiding, abetting, authorizing, ratifying, condoning, participating in, or conspiring with their Co-Defendants to participate in and commit the wrongful acts referred to herein.

5. Plaintiff Jordan Descafano ("Plaintiff") was hired by the Department on or about December 15, 2015 as a police officer by Defendant Verona.

6. Plaintiff's initial year of employment was considered probationary, which led Plaintiff to be extremely fearful of raising legitimate issues with the Department.

7. However, on October 12, 2016, an incident occurred that Plaintiff could not overlook.

8. On that day at approximately 8:30pm Plaintiff, Defendant Ruglio and several other officers were in the supervisor/patrol room.

9. Plaintiff and Defendant Ruglio were engaged in a discussion about the contract and salaries.

10. Plaintiff said, "Who was the one to ever get rid of that and add five steps?"

11. To which Defendant Ruglio replied, "this has nothing to do with you; you were a Hoboken cop at the time so why are you bringing this up?"

12. To which Plaintiff replied, because I would be making more money that is why I'm bringing this up.

13. Defendant Ruglio then began to verbally assault and sexually harass Plaintiff saying, "Go cry to mom and call your mom," and began to mock Plaintiff by pretending to cry like a baby.

14. Then Defendant Ruglio called Plaintiff a "faggot," and told Plaintiff to, "suck my [Ruglio's] dick," while Defendant Ruglio was grabbing Defendant Ruglio's penis.

15. Defendant Ruglio then stated that he did not feel bad for Plaintiff, in response to which Plaintiff asked Defendant Ruglio what the new contract would have in it to benefit younger cops.

16. Defendant Ruglio then called Plaintiff an "idiot," and told Plaintiff to "go fuck yourself," between five and ten times, then told Plaintiff, that Plaintiff was lucky Defendant Ruglio had taken his medication that morning.

17. Finally, Defendant Ruglio approached Plaintiff in an aggressive manner, again told Plaintiff to "go fuck yourself," numerous times and to, "get the fuck out on the road."

18. Plaintiff attempted to diffuse the situation by saying, "Lieutenant, we're two grown men having a discussion and you're going to curse at me and threaten me to get on the road?"

19. To which Defendant Ruglio responded by telling Plaintiff, "fuck you," "get the fuck out of here," and threatening Plaintiff by saying, "You are fucking with the wrong person. You have four seconds to get out on the road or else there will be a consequence."

20. Plaintiff left the room and Defendant Ruglio followed him out, approached him aggressively again in the hallway and said, "you're fucking with the wrong guy."

21. Plaintiff then left the station house.

22. When Plaintiff returned to the station house at approximately 9:15pm Defendant Ruglio was gone.

23. Plaintiff then called Lieutenant Watkins to report the incident with Defendant Ruglio to him which constitutes protected conduct under New Jersey law.

24. On October 14, 2016, Plaintiff received several text messages from Captain Kiernan, who is a close, personal friend of Defendant Ruglio's, "Are you sure you want to do this? I will talk to him and have him apologize to you."

25. Plaintiff did not respond to Kiernan's attempts to inappropriately dissuade Plaintiff from making a complaint against Defendant Ruglio for his outrageous, discriminatory and illegal conduct.

26. The next time Plaintiff was scheduled to work several days later when he arrived he saw that Defendant Ruglio had posted job applications for EXXON, IHOP, and Dunkin

Donuts in the same room where the incident had occurred and had posted a memo stating how lucky the junior officers are to have their jobs and if they don't like it they can go work somewhere else.

27. Defendant Ruglio's memo and job applications were meant to and did make Plaintiff feel intimidated and harassed.

28. However, Defendant Ruglio's attempts to intimidate Plaintiff were unsuccessful, as Plaintiff felt he had a duty to his fellow officers to file a formal complaint regarding Defendant Ruglio's conduct and he did so which constitutes protected conduct under New Jersey law.

29. Plaintiff was not the first officer to be attacked and harassed in the above-described manner by Defendant Ruglio and his pattern and practice of this type of misconduct was well known to numerous superior officers in the Department who took no steps to remediate or repudiate the misconduct.

30. Instead, after the incident with Plaintiff and the institution of an IA investigation into said incident, Defendant Ruglio was promoted to the rank of Captain.

31. Defendant Ruglio's harassment of Plaintiff did not stop with the incident or his later posting of the threatening memo and job applications; within a week of the October 13, 2016, incident a PBA meeting was held and every time Plaintiff attempted to speak Defendant Ruglio would interrupt and rudely silence Plaintiff, saying, "It's not your turn to speak," and called Plaintiff "hard headed," and "stupid" in front of all in attendance.

32. On another occasion, prior to the 2016 Department holiday party, Plaintiff was in the hallway in front of the Detective Bureau and Defendant Ruglio, Sergeant Banta, Captain Kiernan, and Officer Barone were in the office when Sergeant Banta asked Defendant Ruglio if

he was going to the party, to which Defendant Ruglio replied, "No, I will end punching one of these young motherfuckers in the mouth," in an obvious reference to Plaintiff.

33. As a result of the October 13, 2016, incident Plaintiff was inexplicably charged with insubordination a clear-cut act of retaliation for his protected conduct and Defendant Ruglio was charged with some type of misconduct.

34. The recommended discipline for Plaintiff was a 30-day suspension while, on information and belief, Defendant Ruglio received no discipline.

35. When Plaintiff was advised that he could not fight the discipline because he was on probation and that, "[Ruglio] has a loose cannon and he is a ticking time bomb so even though he is wrong, you need to just take the suspension and move on."

36. Plaintiff followed the advice and his suspension was reduced to 4-days.

37. After reporting the October 13, 2016, incident to Lieutenant Watkins and telling Watkins he was uncomfortable working with Defendant Ruglio going forward, Plaintiff had a meeting with Chief Stern and Lieutenant Watkins during which Chief Stern told Plaintiff that since Plaintiff and Defendant Ruglio had both been charged with penalties Plaintiff had to move on and work with Ruglio.

38. Plaintiff stated to Chief Stern that he still did not feel comfortable and was scared and stressed at having to continue to work with Ruglio, but was fearful of losing him job over this incident.

39. Plaintiff was given no choice other than to continue to go to work with his harasser and be put in a hostile and retaliatory work environment.

40. Chief Stern asked Plaintiff if he would be willing to meet with Defendant Ruglio and Plaintiff said yes, he would.

41. The next afternoon Plaintiff, Chief Stern, Lieutenant Watkins, now-Sergeant Conderelli, and Defendant Ruglio had a meeting.

42. Sergeant Conderelli is the PBA President and a close friend of Defendant Ruglio's.

43. During the meeting Defendant Ruglio threatened Plaintiff, stating that if Plaintiff screwed up he would face the same consequences as everyone else and stated that he, Ruglio, will never be friends with Plaintiff because Plaintiff made the complaint against him; making Defendant Ruglio's intent to retaliate against Plaintiff for engaging in protected conduct under the Conscientious Employee Protection Act and New Jersey Law Against Discrimination clear.

44. Defendant Ruglio claimed that Plaintiff did not respect him and his position and that Plaintiff, "didn't know who [Ruglio] is, [Ruglio] is born and raised in Verona and has been a cop for 23 years," clearly implying that Ruglio believed he was entitled to special treatment, including not being held to account for his misconduct, because he had grown up in Verona and been a police officer for many years.

45. Defendant Ruglio was also permitted to interfere with Plaintiff's rights to due process during the meeting, as every time Plaintiff attempted to speak, Defendant Ruglio threatened to write him up for insubordination if he did.

46. Following the meeting, Plaintiff was forced to work to consecutive night shifts under Defendant Ruglio's supervision.

47. Following the meetings with the Chief and then Defendant Ruglio and others, including the Chief, who all did nothing whatsoever to remediate or repudiate Defendant Ruglio's harassment and retaliation against Plaintiff, Plaintiff had no further recourse for seeking help to stop the harassment and retaliation he was being subjected to.

48. Following the incident and the meetings, Plaintiff kept his head down, worked hard and had no issues at work.

49. Chief Stern had even called Plaintiff in off the road to tell him how well he had been doing and not to worry about anything and that Plaintiff should not worry about losing his job.

50. Then, on April 29, 2017, Plaintiff was at the Verona Inn with his fiancé and three friends.

51. At the end of the night he had a brief disagreement with the bouncer, after which Plaintiff left the establishment.

52. Plaintiff had no physical contact with the bouncer, they merely exchanged words briefly and Plaintiff left to avoid any further issue.

53. The next day Plaintiff found out that an employee of Verona Inn, Sean Carroll, who also tended bar at the Avenue Bistro in Verona, saw Defendant Ruglio at the Avenue Bistro and told him about Plaintiff's disagreement with the bouncer at Verona Inn.

54. Still harboring a desire to retaliate against Plaintiff, Defendant Ruglio called Lieutenant Watkins and insisted he open an IA investigation into Plaintiff's disagreement with the Verona Inn bouncer.

55. Lieutenant Watkins did an initial investigation and determined there was nothing there.

56. Defendant Ruglio was unsatisfied, so he went over Lieutenant Watkins' head to Ruglio's best friend, Captain Kiernan, and demanded that action be commenced against Plaintiff.

57. Plaintiff was then charged with two charges based on complaints from an anonymous person.

58. Plaintiff was never officially served with the charges.

59. Plaintiff gave the Department the names of all of the people who were with Plaintiff on the night in question and not one of them was ever interviewed even informally.

60. On information and belief, Defendant Ruglio and his personal friends Captain Kiernan and Sergeant Conderelli went to Defendant Verona's Township Manager and influenced him to have Plaintiff's employment terminated.

61. Chief Stern was asked to leave and his last day was May 30, 2017.

62. Plaintiff's termination was effective June 7, 2017, by the Township Manager and the Officer in Charge, Captain Depoe.

63. The next day Captain Depoe told the Department's officers that the hardest thing he had ever had to do was to let Plaintiff know he was being fired.

64. Plaintiff has since been contacted by several officers with the Department regarding issues they have and/or are having with Defendant Ruglio and with the fact that even though Defendant Ruglio's misconduct is well known to the Department and Defendant Verona nothing had ever been done to remediate or repudiate same.

65. Plaintiff's objection to Defendant Ruglio's sexual harassment in calling Plaintiff a "faggot" and telling him to "suck [Ruglio's] dick," constitutes protected conduct under the New Jersey Law Against Discrimination ("LAD").

66. Plaintiff's complaints regarding the violations of the LAD and Plaintiff's filing of the IA complaint against Defendant Ruglio both constitute protected conduct under the Conscientious Employee Protection Act ("CEPA").

67. Defendants' hostility toward Plaintiff for his protected conduct under CEPA and the LAD culminated in the creation of a hostile and retaliatory work environment in violation of the New Jersey Conscientious Employee Protection Act, N.J.S.A. 34:19-1, et. seq. ("CEPA"), as a result of which Plaintiff was damaged including but not limited to his wrongful termination.

68. After Plaintiff was wrongfully terminated the discrimination and retaliation did not end as Defendants, upon information and belief, told the Bloomfield Police Department, with whom Plaintiff applied for a police officer position following his wrongful termination by Verona, and provided false negative information in order to prevent Plaintiff from being hired as a police officer in Bloomfield, NJ, which Defendants were successful in doing as Plaintiff was denied employment with Bloomfield PD.

69. The retaliatory conduct complained of involved the active participation of upper management or the willful indifference of same, was especially egregious, occurred with actual malice and was in knowing and deliberate violation of Plaintiff's rights.

70. As a direct and proximate result of Defendants' retaliation against Plaintiff, which retaliation was motivated by Plaintiff's protected conduct, Plaintiff's right to be free from retaliation has been violated, as result of which Plaintiff has been damaged.

71. As a direct and proximate result of the above described conduct Plaintiff's rights under CEPA have been violated.

WHEREFORE, Plaintiff seeks damages to vindicate his rights under the laws and remedy the egregious loss and damages inflicted upon him by Defendants, including, but not necessarily limited to compensatory damages, emotional distress damages, economic damages, back pay, front pay, reinstatement, damages for loss of benefits, health care coverage, pension service credit, retirement savings loss, acts and continued harassment, consequential damages,

damage to reputation, equitable relief, punitive damages, attorneys' fees, multiplier of damages, costs of suit and any other relief that may be required and/or is just under the circumstances now and into the future.

COUNT TWO

72. Plaintiff hereby incorporates paragraphs 1 through 71 as if fully set forth herein.

73. Plaintiff's objection to Defendant Ruglio's sexual harassment in calling Plaintiff a "faggot" and telling him to "suck [Ruglio's] dick," constitutes discrimination and sexual harassment in violation of the LAD.

74. As a direct and proximate result of Defendants' discrimination and sexual harassment, Plaintiff's right to a workplace free of discrimination and sexual harassment have been violated, as result of which Plaintiff has been damaged.

WHEREFORE, Plaintiff seeks damages to vindicate his rights under the laws and remedy the egregious loss and damages inflicted upon him by Defendants, including, but not necessarily limited to compensatory damages, emotional distress damages, economic damages, back pay, front pay, reinstatement, damages for loss of benefits, health care coverage, pension service credit, retirement savings loss, acts and continued harassment, consequential damages, damage to reputation, equitable relief, punitive damages, attorneys' fees, multiplier of damages, costs of suit and any other relief that may be required and/or is just under the circumstances now and into the future.

COUNT THREE

75. Plaintiff hereby incorporates paragraphs 1 through 74 as if fully set forth herein

76. Plaintiff's objection to Defendant Ruglio's sexual harassment in calling Plaintiff a "faggot" and telling him to "suck [Ruglio's] dick," constitutes protected conduct under the New Jersey Law Against Discrimination ("LAD").

77. Plaintiff's complaints regarding the violations of the LAD and Plaintiff's filing of the IA complaint against Defendant Ruglio constitute protected conduct under the LAD.

78. Defendants' hostility toward Plaintiff for his protected conduct under the LAD culminated in the creation of a hostile and retaliatory work environment in violation of the LAD, as a result of which Plaintiff was damaged.

79. The retaliatory conduct complained of involved the active participation of upper management or the willful indifference of same, was especially egregious, occurred with actual malice and was in knowing and deliberate violation of Plaintiff's rights.

80. As a direct and proximate result of Defendants' retaliation against Plaintiff, which retaliation was motivated by Plaintiff's protected conduct, Plaintiff's right under the LAD to be free from retaliation has been violated, as result of which Plaintiff has been damaged.

81. As a direct and proximate result of the above described conduct Plaintiff's rights under the LAD have been violated.

WHEREFORE, Plaintiff seeks damages to vindicate his rights under the laws and remedy the egregious loss and damages inflicted upon him by Defendants, including, but not necessarily limited to compensatory damages, emotional distress damages, economic damages, back pay, front pay, reinstatement, damages for loss of benefits, health care coverage, pension service credit, retirement savings loss, acts and continued harassment, consequential damages, damage to reputation, equitable relief, punitive damages, attorneys' fees, multiplier of damages,

costs of suit and any other relief that may be required and/or is just under the circumstances now and into the future.

COUNT FOUR

82. Plaintiff hereby incorporates paragraphs 1 through 81 as if fully set forth herein.

83. Defendant Verona also failed to meet certain requirements pursuant to N.J.S.A. 34:19-7 for which it was deficient.

84. As a direct and proximate result of Defendant Verona's violations of N.J.S.A. 34:19-7, Plaintiff has been damaged as set forth herein.

WHEREFORE, Plaintiff seeks damages to vindicate his rights under the laws and remedy the egregious loss and damages inflicted upon him by Defendants, including, but not necessarily limited to compensatory damages, emotional distress damages, economic damages, back pay, front pay, reinstatement, damages for loss of benefits, health care coverage, pension service credit, retirement savings loss, acts and continued harassment, consequential damages, damage to reputation, equitable relief, punitive damages, attorneys' fees, multiplier of damages, costs of suit and any other relief that may be required and/or is just under the circumstances now and into the future

IONNO & HIGBEE, LLC

Attorneys for the Plaintiffs

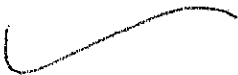
BY: 

SEBASTIAN B. IONNO

Dated: 11/16/17

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury.

BY: 

SEBASTIAN B. IONNO

DESIGNATION OF TRIAL COUNSEL

Plaintiffs hereby designate Sebastian B. Ionno, Esquire as trial counsel in this matter.

BY: 

SEBASTIAN B. IONNO

CERTIFICATION

The undersigned counsel certifies that there are no other actions or arbitrations pending or contemplated involving the subject matter of this controversy at this time, and there are no additional known parties who should be joined to the present action at this time. I certify the foregoing to be true. I am aware if the above is willfully false, I am subject to punishment.

BY: 

SEBASTIAN B. IONNO

DATED: 

RULE 1:4-8 DEMAND

Plaintiffs and their counsel hereby demand, pursuant to Rule 1:4-8, that the Defendants or their agents, servants, or employees, or attorneys provide any and all facts and documents upon which they base any contention that this Complaint was instituted or continued in whole or in part for improper reasons, or that the claims are, in whole or in part, frivolous or without basis in law or fact.

BY: _____

SEBASTIAN B. IONNO