

Helen Natsis
Konstantinos Natsis
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Pro-Se as Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

HELEN NATSIS AND KONSTANTINOS NATSIS

Plaintiffs,

vs.

CASE NO:

COMPLAINT
DEMAND FOR JURY TRIAL

RICHARD TURNER, MAYOR OF WEEHAWKEN,
FRANK LAMOLINO, TOWNSHIP OF WEEHAWKEN
BUILDING INSPECTOR, FRANK TATTOLI,
TOWNSHIP OF WEEHAWKEN, CONSTRUCTION
OFFICIAL SHAWN MASTERSON, TOWNSHIP OF
WEEHAWKEN, BUILDING DEPARTMENT,
VINCENT RIVELLI, TOWNSHIP OF WEEHAWKEN,
HEALTH OFFICER, POLICE OFFICER AUGUSTO
A. SAME, POLICE OFFICER CONRAD HABLITZ,
SERGEANT PATRICK CANNON POLICE OFFICER,
DETECTIVE THOMAS WHITE, SERGEANT REBE
ROA, POLICE OFFICER, IGGY MITOLO, DETECTIVE
SERGEANT, D/CHIEF JEFFREY FULCHER,
SERGEANT JOHN JOHNSON, TOWNSHIP OF
WEEHAWKEN POLICE DEPARTMENT. KIM
PAMPERIN, TRACY PAMPERIN, DENISE
HODKINSON, HARRY HODKINSON, DONNA
JANDIK, ADJACENT / UPHILL HOMEOWNER'S
and/or employee of the Township of Weehawken, who
anticipated in the arrests of Konstantinos Natsis,
PMK GROUP, J. FLETCHER CREAMER & SON,
MAYO LYNCH ASSOC. INC., AVELLA GARAGE

a/k/a HIGHPOINT, A. Robert Paulding a/k/a Paulding
Haich Design Architects and Paulding
Design Group LLC. M&A Demolition & Excavation,
Michael Ambrosio, and Joseph Fell, Esq. services
not rendered Engaging in a pattern of harassing of
harassments and selective enforcement,
to HELEN NATSIS AND KONSTANTINOS NATSIS,

Defendants.

The Named Plaintiffs, Helen Natsis and Konstantinos Natsis, bring this action
on behalf of themselves, both United States Citizens, appearing pro-se complaining
of the Defendants, say:

INTRODUCTION

1. This action arises under the Fourth, Fifth, Eighth and Fourteenth Amendments to
The Constitution of the United States, under Federal Law, specifically 42 U.S.C. 1983,
1985 and 1988 in that the Defendants were acting within the scope of employment,
and under Color of State Law and engaged in pattern of harassment against us, as
Plaintiffs, Helen and Konstantinos Natsis, ultimately resulting in the unlawful stop,
unlawful search, unlawful arrest, and unlawful seizure and the excessive use of force
against us, Helen and Konstantinos Natsis, and the selective enforcement of various laws
against us, that all actions of the Township of Weehawken over many years have
involved an unlawful taking of our property. This action is brought against the
Township of Weehawken, for failing to properly train and supervise the individual
Defendants in the proper use of force and techniques used to secure investigative

information and to implement proper policies, procedures, practices and custom regarding arrests that result in excessive use of force.

2. The Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. Section 1331, 1332, 1343 and 1367 and the venue is properly set in the United States District Court District of New Jersey.

PARTIES, JURISDICTION AND VENUE

1. Helen Natsis, Plaintiff, is a resident of Weehawken New Jersey, Hudson County, State of New Jersey.

2. Konstantinos Natsis, Plaintiff, is a resident of Weehawken New Jersey, Hudson County, State of New Jersey.

3. The Defendant, Mayor Richard Turner, upon information and belief is a resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as an employed Mayor of the Township of Weehawken and was acting under the Color of State Law.

4. The Defendant, Frank Lamolino, upon information and belief is a resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as an employed Building Inspector of the Township of Weehawken and was acting under the Color of State Law.

5. The Defendant, Frank Tattoli, upon information and belief is a resident of the State of New Jersey, and at all times material to the allegations

contained in this complaint was acting in his capacity as an employed Construction Official of the Township of Weehawken and was acting under the Color of State Law.

6. The Defendant Shawn Masterson, upon information and belief is a resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as an employed Building Inspector of the Township of Weehawken and was acting under the Color of State Law.

7. The Defendant Vincent Rivelli, upon information and belief is a resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as an employed Health Officer of the Township of Weehawken and was acting under the Color of State Law.

8. The Defendant Police Officer Augusto A. Same, upon information and belief is a resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as a Police Officer employed by the Township of Weehawken, Police Department and was acting under the Color of State Law.

9. The Defendant Police Officer Conrad Hablitz, upon information and belief is a resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as a Police Officer employed by the

Township of Weehawken, Police Department and was acting under the Color of State Law.

10. The Defendant Sergeant Patrick Cannon upon information and belief is resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as a Sergeant employed by the Township of Weehawken, Police Department and was acting under the Color of State Law.

11. The Defendant Detective Thomas White, upon information and belief is resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity a Detective employed by the Township of Weehawken, Police Department and was acting under the Color of State Law.

12. The Defendant Sergeant Rebe Roa, upon information and belief is resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as a Sergeant employed by the Township of Weehawken, Police Department and was acting under the Color of State Law.

13. The Defendant Police Officer Iggy Mitolo, upon information and belief is resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as a Police Officer employed by the Township of Weehawken, and was acting under the Color of State Law.

14. The Defendant Detective Sergeant D/Chief Jeffrey Fulcher, upon information

and belief is resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as a Detective Sergeant, employed by the Township of Weehawken, Police Department and was acting under the Color of State Law.

15. The Defendant Sergeant John Johnson, upon information and belief is resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as a Sergeant employed by the Township of Weehawken, Police Department and was acting under the Color of State Law.

16. The Defendant Donna Jandik, upon information and belief is resident of the State of Florida, and at all times material to the allegations contained in this complaint was acting in her capacity as a Secretary for the Mayor, employed by the Township of Weehawken and as adjacent neighbor, was acting under the Color of State Law.

17. The Defendant Township of Weehawken is a political sub-division of the State of New Jersey and at all time material to the allegations contained in this complaint, the above referenced Defendant were agents, servants and/or employees of the Township of Weehawken, and was acting under the color of State Law.

18. The Defendant, Township of Weehawken Police Department is a division and/or arm of the Weehawken governing body, and acted individually and in concert with the same and all relevant times employed Defendant Police Officers set forth above.

19. The Defendant Kim Pamperin, upon information and belief is a resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in her capacity as an uphill homeowner who anticipated in the arrest of Konstantinos Natsis, was acting under the Color of State Law.

20. The Defendant Tracy Pamperin, upon information and belief is resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in her capacity as an uphill homeowner who anticipated in the arrest of Konstantinos Natsis, was acting under the Color of State Law.

21. The Defendant Denise Hodgkinson, upon information and belief is resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in her capacity as an uphill homeowner who anticipated in the arrest of Konstantinos Natsis, was acting under the Color of State Law.

22. The Defendant Harry Hodgkinson, upon information and belief is resident of the State of New Jersey, and at all times material to the allegations contained in this complaint was acting in his capacity as an uphill homeowner and anticipated in the harassment acting under the Color of State Law.

23. The Defendant PMK Group, upon information and belief is an Engineer Firm of the State of New Jersey, and at all times material to the allegations contained in this complaint were acting in there capacity as Engineers, hired by the Township of Weehawken and was acting under the Color of State Law.

24. The Defendant J. Fletcher Creamer & Son, Inc. upon information and belief is a Contractor of the State of New Jersey and at all times material to the allegations contained in this complaint were acting in there capacity as Contractors hired by the Township of Weehawken and was acting under the Color of State Law.

25. The Defendant Mayo Lynch, upon information and belief is an Engineer Consulting Firm of the State of New Jersey and at all times material to the allegations contained in this complaint were acting in there capacity as Engineers hired by the Township of Weehawken and were acting under the Color of State Law.

26. The Defendant Avella Garage a/k/a Highpoint, upon information and belief is a Towing Company of the State of New Jersey and at all times material to the allegations contained in this complaint was acting in there capacity as Towers-Impounders for the Weehawken Police Department hired by Weehawken and was acting under the Color of State Law.

27. The Defendant A. Robert Paulding a/k/a Paulding Haich Design Architects and Paulding Design Group LLC., upon information and belief is an Architect of the State of New Jersey and at all times material to the allegations contained in this complaint was acting in his capacity as a Architect, hired by us Plaintiffs, was acting under the Color of State Law.

28. The Defendant M&A Demolition & Excavation, the Estate of Michael Ambrosio, upon information and belief is a Contractor of the State of New Jersey and at all times material to the allegations contained in this complaint was acting in his capacity as a Contractor Excavator and Demolition Specialist, hired by us Plaintiffs

was acting under the Color of State Law.

29. The Defendant Joseph Fell Esq. upon information and belief is a Attorney of the State of New Jersey and at all times material to the allegations contained in this complaint was acting in his capacity as Attorney hired by us Plaintiffs was acting under the Color of State Law.

FACTUAL ALLEGATIONS

30. I, Helen and Konstantinos Natsis, have been residents of the Township of Weehawken, County of Hudson, State of New Jersey, since April 2000. The property consisted of several different lots. We reside in a home with our adult son, which is located on one of these lots.

31. Prior to the purchase of the said property, a title search was run. The result of this title search did not reveal any type of sewer easement. This easement existed for decades and ran with the property. After the purchase of the property, it was in the area of this easement holder's line connection that leakage problems developed. We noticed a reeking stench around the property.

32. There were two additional uphill homeowner's tied in with the easement, without the right under the easement agreement. Sewage discharge odors was traveling daily. This was not up to Code. The Township of Weehawken did not give any violations to the previous homeowner, whom we purchased the property from. In fact after several months living in the Town of Weehawken, we were informed by the previous tenant they had sewer back-up problems entering the house and property. There

personal belongings had been damaged. The previous homeowner reimbursed them money several times for the damages that occurred. They were informed not to report any claims to the insurance company. My claims that were reported to New Jersey Manufacturer's Homeowner's Insurance Company has all been denied.

33. In April 2000, we received permission from Nicholas Recarnati, employed by the Township of Weehawken, as a Building Official, to begin the clean-up. We rented several containers and began the clean-up. The clean-up took several weeks.

34. After one year, The Township of Weehawken takes the position that work being done on the property is without town-issued permits, and that we are causing damage of the palisades cliff (slope area), to the adjacent homeowner's. Our numerous complaints are made to the Township of Weehawken. We did not cause damage on our own property. Damages were created by a combination of Sewer (storm and sanitary sewer), along with rock fall that caused erosion to take place. Follow up cleaning was removing the weeds, garbage and shrubs.

35. The Township of Weehawken has turned their tables saying we created a health nuisance to the public. False accusations and harassment are made against us. We have been blamed; harassed and bullied by the Defendants Township Officials, that we have caused and created problems on the steep slope. Konstantinos Natsis, is arrested, handcuffed and taken into custody. His Miranda Rights have not been read.

36. The Township of Weehawken along with the Officials put him in jail. They

did this many times, treated him as a criminal without proper facts and reason. The Township imposed multiple fines without due process of law.

37. The Township is using the scared tactic and is bullying us for many years. The Township of Weehawken developed an animosity against us, Plaintiffs Helen and Konstantinos Natsis. They stated it upon a pattern of zoning violations, we have done nothing in receiving permits, and that we have caused damage to the Steep Slope, by creating a health nuisance to the public. These accusations are all false.

38. Verbal permission was given to us to clean the property in the year 2000. A steep slope ordinance permit was not mentioned. It was not shown on the Township zoning map when we purchased the property. According to the Engineer's report in 2002, we did not create any problems to the slope. It was the Township making false accusations against us. See Attached Exhibit C 48.

39. Instead the Township of Weehawken always held us liable. They have bullied and harassed us of not following the Seep Slope Ordinance. There are two Zoning Ordinance Maps dated November 1986. As of today, it is unclear which one is accurate in the Township of Weehawken. We requested to see the permits that have been issued to all the homeowner's in the Township of Weehawken referencing the Steep Slope Ordinance. Our request has not been abided. See Attached Exhibit C 44 and C 45.

40. For Years, we are requesting to receive permits from the Township of Weehawken. We are denied permits. The Township of Weehawken showed a strong dislike toward us. We have been accused; harassed and bullied. Our Constitutional Rights

have been violated

41. We repeatedly and have taken the position, and so has the Jury Verdict, that we did not cause these problems on the property, we own. But, we have been tyrannized with the sewer problems in our home and on our property, for many years. It has created an emotional and physical stress which is without explanation.

42. This is due to the fact the Township wants to take over, steal away the property we own. They showed an interest in 2006 by sending us a letter. See Attached Exhibit D 51. The Township Officials are harassing, us scaring us and have, bullied us. Our Constitutional Rights have been violated.

43. The rear of our home has a ten foot retaining wall. This area had dirt on a flat surface. In the corner existed the old clay sewer pipe for decades. We had this area cleaned; so it may be used as our patio area. See Attached Exhibit A 7.

On August 2, 2002, PMK Group project number 0201124, Interim Site Stability Plan shows gabion walls.

44. On March 16, 2004, PMK Group project number 0203117 does not show gabion walls on there design plan. Therefore, the accurate plan specified above was not followed correctly. The Construction Crew of J. Fletcher & Creamer & Son, placed gabion walls on our property, made from chicken wires and brought tons of rock

And added these tons of rock to our property. See Attached Exhibit A 8. There was an extreme change of the property. This is done without our approval or consent. The Township of Weehawken Officials intervened.

45. The PMK Group interim site stabilization plan as proposed by the PMK Group did not function, as designed. J. Fletcher Creamer & Son, Inc. never followed The PMK Group plans. It was not part of the design.

46. They followed the advice of Mayor Richard Turner, his prior secretary, Donna Jandik, adjacent homeowner, Frank Tattoli, Construction Official, Frank Lamolino, Building Inspector, and Sergeant Patrick Cannon, Police Department, all employed in the Township of Weehawken. Harassment, bullying still continued. We are falsely blamed that we have caused problems on the palisades cliff, slope area of the property, we own.

47. Konstantinos Natsis, is arrested. His Miranda Rights have not been read. Our Constitutional Rights have been violated. The gabion walls placed on our property by J. Fletcher Creamer & Son, Inc. was unnecessary. These walls collapsed. See Attached Exhibit C 118. We were blamed, bullied and harassed. We were held responsible for someone else's action. This design of PMK Group was done without our permission and our approval. The Township of Weehawken continued to ignore, the sole obligation and responsibility, for the failure of our property. The Township of Weehawken continued to harass and trespass on our property.

48. The Township of Weehawken used and wasted (our money, the Taxpayer's money) the sum of over one hundred twenty three thousand dollars, on our property performing temporary work stated it on the fact it was an emergency. It was the design of PMK Group and J. Fletcher Creamer and Son, Inc. who are liable to restore our property back to the way we had it prior to there entrance. See Attached Exhibit A 2.

They are liable for the negligence they performed. They were both paid with (our money, the Taxpayer's money). See Attached Exhibit A 6 which is the removal of rocks, dirt, and live trees with stumps from the property. This was intentionally done to weaken the land and our home. This was done so the Township Officials can take away / steal the property us without just compensation in violation of both the United States Constitution and the New Jersey Constitution Article 1, Paragraph 20.

49. J. Fletcher Creamer & Son, Inc. used the Excavation machine. They destroyed the property. We did not use any excavation machine or heavy equipment. We repeatedly and have taken the position, we did not cause these problems on the Property, we own. See Attached Exhibits C 128 C 129 C 131 and D 138.

The Jury Verdict was in our favor.

FIRST COUNT

50. We as Plaintiffs attempted on many occasions to get HELP (Township claimed we ignored the whole situation with our property) the Township of Weehawken, Mayor's Office, the Building Department, the Health Department, The Department of Public Works, the Department of Environmental Protection of New Jersey, the State of New Jersey Office of the Attorney General, Department of Law and Public Safety, The State of New Jersey Health Department, The Hudson, Essex, Passaic Soil Conservation District, the Board of Architects in New Jersey, The Ethnic Committee, State of New Jersey, the Department of Community Affairs, The Hudson Regional Health Department in Secaucus, New Jersey The Governor's office in Trenton New Jersey, the

Prosecutor's Office of Hudson County, Jersey City, New Jersey and the Federal Bureau of Investigation, in Newark, New Jersey. We kept going around in circles. We were and are looking for Justice.

51. The Township of Weehawken made false accusations that we did not do anything to maintain the property. We exhausted ourselves in seeking help from many Government's Offices. Our Constitutional Rights have been violated.

52. The Township of Weehawken, through its agents and employees has continually trespassed upon our property. They based there claim as an emergency situation. This in fact is not accurate as there have not been any emergency situations which would justify the continued trespass on our property.

53. Defendants, the Township of Weehawken has been notified on many occasions that their presence on our property was not invited. The Township of Weehawken Officials became involved with our property. They did not acknowledge the fact that we hired our own Engineers, Architects and Contractors. They have intervened and trespassed on the property, without our approval. The actions by the defendant, Township of Weehawken constitute a taking / stealing of our property without just compensation in violation of the United States Constitution and the New Jersey Constitution Article 1, Paragraph 20.

54. Defendants, the Township Officials have put us through emotional and physical stress. They have tortured us. This is all due to taking of our property which has been going on for thirteen in a half years. Not only did we have to deal with the harassment and bullying of the Township Officials, but we also had to deal with the

harassment of the several adjacent homeowner's, accusing us of breaking the sewer pipe, and destroying the steep slope area. We have been accused of weakening the land causing damage to there property.

55. Several Engineers that we hired viewed the site many times. These neighbors were filing false complaints with the Township of Weehawken, Police Department and the Township of Weehawken, Building Department. The neighbor's had Konstantinos Natsis, arrested. His Miranda Rights have not been read.

56. We never brought any excavation machine on our property. The Contractor of J. Fletcher Creamer & Son Inc. brought the excavation machine on the property. We are looking for Justice. The actions by the defendant, Township of Weehawken constitute a taking away of our property without just compensation in violation of both the United States Constitution and the New Jersey Constitution Article 1, Paragraph 20.

57. The Township of Weehawken Officials take the position that the work of gardening, planting and cleaning being done on our property we own, is done without town issued permits. Furthermore, the Township will not issue us permits for this type of work. We have been trying to clean the driveway, parking lot area for several years. Permits for this cleaning have been denied. We rented several containers and placed our garbage and debris in them.

58. The sewer line ran through our property. As a consequence of this problem, a temporary relocating of underground pipe was effectuated. Several over ground

pipes were rerouted on our property. The uphill homeowner's accused us of tampering with the pipe. This temporary condition was horrible and interfered extensively with the use and enjoyment of our property. We tolerated such and recognized the need to resolve the problem. We lived with this torturous situation of reeking stench odors for many years. This was not up to Code in the Building Department records of the Township of Weehawken.

59. This horrendous situation was affecting our ability to live in a peaceful fashion. We had a trial in the Superior Court of New Jersey in Hudson County, New Jersey. A Jury Verdict determined that we did not cause the problem to the sewer easement, but Judge Antonin, according to our Attorney at the time, Judge Antonin, erroneously entered A Judgment before the Jury Verdict in favor of the Township of Weehawken and against us for the work that they performed in temporary repairing of the sewer problem. The Court further dismissed our claims against the easement holder before the jury returned its verdict. Serious errors were made by the Trial Judge.

The Jury Verdict question number one was:

Did Natsis and/or previous owners breach the easement
Contract with Pamperin by destabilizing the steep slope thus
Undermining the sewer line easement?

Answer was No.

The Court imposed a Judgment against us and after already having dismissed the uphill homeowner's and the Township of Weehawken. We filed for an appeal in the Appellate Division. The judgment was overturned on appeal, in January 2007. We win our first court case battle over sewer line. Docket No. A-0774-08T10774-08T1.

60. As a result of the false arrest and/or detention, Konstantinos Natsis was injured in body and mind, suffered in his business and reputation, has expended large sums of money in his defense, and was otherwise damaged.

61. We were awarded a Judgment of one hundred fifty seven thousand dollars (\$157,000.00) plus interest, from the easement holder defendants Kim Pamperin and Tracy Pamperin. As of date, no payments of this Judgment have been made. It took seven in half years to get the sewer discharge removed from our property. The Township of Weehawken installed a new sump pump system, on the slope. When the system fails, the sewer discharge from the several above homeowner's, leaks on to our property on the steep slope area. No permits from the Department of Environmental Protection Agency was available once we requested for it.

62. Due to the health issues presented by the sewer discharge over a number of years, the Township of Weehawken Officials declared the situation a public health Nuisance and eventually held us liable and responsible of creating such.

63. The Township of Weehawken issued us multiple violations for failing to correct the nuisance public health hazard. The State of New Jersey, DEP fined us fifty thousand dollars a day. See Attached Exhibit D 46. There was no record or indication with the Township of Weehawken, permits for such an illegal connection. We retained the services of several expert Engineers, August C. Lozano, P.E., Charles Bluemling, P.E. Jim Coc Engineer and Robert Costa, Engineer.

64. We also inherited significant debris which have accumulated on the premises

that required extensive clean-up of the property which evidently had not been tended to for a very long time, from the previous homeowners, H & H Cross, George McClary and Edward McClary.

65. In 2002, without our consultation the Township of Weehawken prepared bid Specifications (to claim without proof not being the truth) for a construction job on our property. This construction job refers to as temporary site stabilization plan. The work purposed is construction of retaining walls, on our property, construction of gabion walls and the placement of over ground pipes close to our residence. We had no input and were always reprimanded.

66. On May 6, 2002, the Township of Weehawken under false appearance of an Emergency made an application before the Township of Weehawken, Municipal Court. The application was to obtain an Order of the Court to allow construction to proceed on our property with the plans and specifications prepared in January 2002, referenced previously. This Order was entered without any interference by us.

67. The Township of Weehawken, through its agents and employees has continually trespassed upon our property. They based there claim as an emergency situation. This is in fact not accurate as there have not been any emergency situations which would justify the continued trespass on our property.

68. The Township of Weehawken has been notified on many occasions that their presence on our property was not invited. They have intervened and trespassed on the property.

69. Due to the health issues presented by the leaking sewer pipe over a number of years, Defendant, The Township of Weehawken Officials declared the situation a public health nuisance and eventually pursuant to a Court Order dated February 19, 2004, the Township undertook the repair. They stated the fact it was an emergency situation. This was to benefit all the adjacent homeowner's. The repair of the sewer pipe still was not permanently repaired. It took an additional three in a half years from 2004 Court Order to get it resolved. The property had a drastic change.

70. The Township of Weehawken Officials, ignored our numerous complaints and torturous situation, that we had suffered. But The Township of Weehawken were quick enough to harass, blame, bully us and Konstantinos Natsis was handcuffed and arrested. His Miranda Rights have not been read. This is an on going pattern in the Township of Weehawken.

71. There were numerous large rocks and trees on the slope, which are needed to prevent erosion of the slope. We previously used these rocks as a retaining wall on the slope, which is made of stabilized hard rock. See Attached Exhibit A 2.

72. PMK Group temporary site stabilization plan was never followed. J. Fletcher Creamer & Son, Inc. entered our property without our approval or input. J. Fletcher Creamer & Son, Inc. removed the three retaining walls that we previously placed prior to there entrance in 2004. See Attached Exhibit A 4. Fletcher Creamer & Son Inc. destroyed our macadam pavement. The stabilization plan proposed by PMK Group, has failed.. We are held liable and responsible for such. Our Engineers site inspection.

See Attached Exhibit C 46 and D 18.

73. The pipe was not repaired as the Court Ordered, but instead the adjacent homeowner, Donna Jandik (the former Secretary of Mayor Turner) had major work done, on her property. See Attached Exhibits D 26, D 30, D 32, D 37, D 88 and CD of video. The pipe from 2004 still continued to discharge sewer leakage, till September 2007. This was an emergency situation which the Township took an additional three in half years to correct. The combination of sewer runoff, storm and sanitary sewer and rock fall caused, damage on the slope, of our own property. We did not cause this problem.

74. The Township of Weehawken Officials have blamed, harassed and bullied, Konstantinos Natsis for creating, such damages. The Miranda Rights were not read.

75. Follow up cleaning was removing the weeds, garbage and shrubs. The Township of Weehawken has tried to turn the tables saying we created a health nuisance to the public. False accusations, bullied and harassment are made against us.

76. A Judgment was entered in favor of the Township of Weehawken and against us Konstantinos and Helen Natsis in the amount of one hundred twenty-three thousand Eight hundred forty-one thousand dollars (\$123,841.00) plus allowable costs of suit. Again, we had to Appeal the above Judgment in the Appellate Division. We won the second Court Battle. Docket No. A-2552-04T22552-04T2.

77. The Judgment was reversed. Our money the Taxpayer's money paid for the

extensive work performed on site by J. Fletcher Creamer & Son Inc. designed by PMK Group. The Contractor and the Engineer hired by the Township of Weehawken Officials, used our money, Taxpayer's money to pay for this extensive work. This was done without our approval or permission. The Township did this so they may eventually take away the property from us. This is beyond an explanation.

SECOND COUNT

78. Application for a permit was applied to the Township of Weehawken many times, for many years. The Township of Weehawken deliberately failed to respond to our request. Instead, the Township of Weehawken would issue Violations, impose multiple fines, harass, blame, arrest, bullied us, liens our property and falsely accuses us of creating a Steep Slope Ordinance Violation on the property, we own. See Attached Exhibit D 51. The actions by the defendant, Township of Weehawken constitute a taking away of our our property without just compensation in violation of both the United States Constitution and the New Jersey Constitution Article 1, Paragraph 20.

79. Many contractors, Engineers were chased away by the Township of Weehawken. No permits would be issued to them or us. We were subject to excessive fines, violations, and harassment.

80. In 2006, the Township of Weehawken Officials place a lien on the property, in order to take it away. This is our primary residence.

81. In 2008 the Township of Weehawken takes us to Court by filing a verified

complaint that the uphill property is going to collapse. This was set forth in Kessler report, the Engineers that represent, the Township of Weehawken. Our Engineers stated in their reports and verbally that there is not an immediate danger of the uphill property to collapse. In 2009, the Township of Weehawken, Officials, file an amended verified complaint, to enter the property.

82. We have been accused of a prima facie under the New Jersey Environmental Rights Act (N.J.S.A. 2A:35A-1,) et seq) and have failed to rebut such claim by the submission, of competent evidence to the contrary. This is not true as Judge Thomas Olivieri, crossed this out in his Judgment that was filed on February 27, 2012, making it clear we did not cause such. See Attached Exhibit C 41 and D 111.

83. We are falsely accused by our conduct directly violated Weehawken Township Ordinance #4-1987, otherwise know as the Steep Slope Ordinance, that we have altered, impaired and destroyed the steep slope of the Palisades Cliff, and that we have impacted the environment and the public's interest and that we have failed to remediate the violator cited by the Township dated back to 2006. The judgment filed on February 27, 2012, the first page has been crossed out by Judge Olivieri. makes it clear in his Judgment about the steep slope. See Attached Exhibit C 41. Our several Engineers site inspection stated we did not cause such. Test pits were done on the property several times. The Test pits showed the slope is not in danger. See Attached Exhibit C 46, by Hatch Mott MacDonald Engineer Firm we hired. August Lozano, Civil Engineer, we hired; analysis showed the main problem was coming from the uphill property homeowner. It appeared to be the primary source. Furthermore, the Failure of PMK Group Design Plan proposed

failed. The J. Fletcher Creamer & Son, Construction, failed. Robert Costa, Engineer we hired, his site inspection states the slope was not in danger for collapse.

84. Again, We are blamed, harassed, bullied and Konstantinos is arrested. His Miranda Rights have not been read. Judge Thomas Olivieri, in his judgment Docket No. 126-08 dated February 22, 2012 gave us the 120 days to clean and remediate our property. We have appealed in the Appellate Division. Our appeal was denied.

85. We do not agree to use the elaborate Mayo Lynch Plans which will cost over a half a million dollars using our money, Taxpayer's money. These elaborate plans were specifically marked NOT FOR CONSTRUCTION. The Township imposed fines without due process of law. We were deprived use and enjoyment of our property, as homeowners in the Township of Weehawken.

THIRD COUNT

86. On April 23, 2000, Municipal Court of Weehawken, New Jersey Konstantinos Natsis was handcuffed and arrested. Case No. 00-04532. Crime Incident disorderly person NJS 2Cj 33-2 a Police Officer Augusto Same. Location is on the property we own. A fine was imposed, of approximately two thousand five hundred dollars. Violation Issued. Attached Exhibit F 2. . His Miranda Rights have not been read.

87. On February 16, 2002, Municipal Court of Weehawken, New Jersey Konstantinos Natsis was handcuffed and arrested. His Miranda Rights have not been read. Violation 2C:17-2 (2) Sergeant Patrick Cannon. Location is on the property we own. Konstantinos is falsely accused of breaking a pvc pipe. The Jury Verdict Answer

was no, we did not create such. Violation Issued.

88. Konstantinos Natsis was falsely and maliciously accused, arrested and harassed. Despite the fact that neither offense give police the Authority to effectuate a warrant less custodial arrest, Konstantinos Natsis Was placed under custodial arrest, handcuffed, removed from his home by the Sergeant Pat Cannon. He was brought to the police station where he was detained for a significant amount of time. He was forced to expend large sum of money to secure bail for him. The defendant, Township of Weehawken, Sgt. Pat Cannon and Vincent Rivelli did falsely arrest and/or detain plaintiff Konstantinos Natsis in violation of Section 1983 of the 14th and 15th Amendments. . His Miranda Rights have not been read. The actions by the defendant, Township of Weehawken constitute a taking of our property without just compensation in violation of both the United States Constitution and the New Jersey Constitution Article 1, Paragraph 20.

89. On our about January 28, 2004, defendant Township of Weehawken, Police Officer Conrad Hablitz, and Police Officer John Doe 1 charged plaintiff Konstantinos Natsis of having committed the offense of prohibited placement, ordinance violation 3-5.2, and further falsely and maliciously accused plaintiff Konstantinos Natsis of failing to show identification, a petty disorderly person Offense. Despite the fact that neither offense give police the authority to effectuate a warrant less custodial arrest, Konstantinos Natsis was placed under custodial arrest, handcuffed, removed from his home by Police Officer Conrad Hablitz. See Attached

Exhibit F 33. His Miranda Rights have not been read. As a result of the false arrest and/or detention, Konstantinos Natsis was injured In body and mind, suffered in his business and reputation, has expended large sums of money in his defense, and was otherwise damage. The actions by the defendant, Township of Weehawken constitute a taking of Our property without just compensation in violation of both the United States Constitution and the New Jersey Constitution Article 1, Paragraph 20.

90. On February 4, 2004, Township of Weehawken Officials along with Defendant Kim Pamperin Complainant, uphill homeowner has Konstantinos Natsis handcuffed and arrested. His Miranda Rights have not been read.

Accused of Criminal 4th Degree. Location is on our own property. Docket No. W-2004-019. Accused of Breaking the pvc pipe. The Jury Verdict answer was no we did not create such. A Judgment was awarded to us for one hundred fifty seven thousand dollars.

As a result of the false arrest and/or detention, Konstantinos Natsis was injured In body and mind, suffered in his business and reputation, has expended large sums Of money in his defense, and was otherwise damage.

91. On April 5, 2012, Konstantinos Natsis is handcuffed and accused of removing a boulder. A criminal arrest is made by the up hill homeowner Defendant Denise Hodgkinson, filing a complaint.

Plaintiff hired day workers to clean the property, at 9AM, as per Judge Olivieri's Court Order. Reference No. 12-00441.

Location of arrest was made in our own home in the evening at approximately 9:30 PM. Konstantinos Natsis was taken into custody, hand cuffed and ended up

in the hospital with a heart condition. False accusation and false arrest has taken place. Harassment still continues. Recently, the Township of Weehawken Construction Official Frank Tattoli and uphill homeowner Denise Hodkinson both complainants did not show up in the Municipal Court in West New York, New Jersey.

We had our litigation going on in The Superior Court of New Jersey in Jersey City, Hudson County. See Attached Exhibit D 121 and D 122.

The Municipal Court Judge Charles P. Daglian, of Weehawken New Jersey did not have the authority to sign the complaint-warrant, with Frank Tattoli as his witness, since our Litigation is in the higher Court.

As a result of the false arrest and/or detention, Konstantinos Natsis was injured In body and mind, suffered in his business and reputation, has expended large sums of money in his defense, and was otherwise damage.

There is a conflict in Weehawken Municipal Court, and all our cases have been removed from the Municipal Court of Weehawken New Jersey.

The actions by the defendant, Township of Weehawken constitute a taking of Our property without just compensation in violation of both the United States Constitution and the New Jersey Constitution Article 1, Paragraph 20.

92. We are being bullied by the Township of Weehawken Officials.

The malicious prosecution occurred despite the Defendants knowing there existed No probable cause to the arrest of Plaintiff Konstantinos Natsis and no probable cause for the continuing of the prosecution against him.

FOURTH COUNT

93. We never had an excavation machine on our property. No construction on our own property was done by us. Konstantinos, had the property cleaned and raked using garden tools, such as a shovel, rake and broom. The property is used as a garden. The slope is built on stabilized rock. Mayo Lynch Engineering is familiar with the slope area on our property. Test pits were performed.

94. Since the purchase of this property in 2000, for thirteen in a half years, the stabilized hard rock has never been removed. The rock has been here for decades. The removal of our three terraced retaining walls were removed by J. Fletcher Creamer & Son, Inc. The uphill homeowner Mr. & Mrs. H. Hodkinson's, removed our retaining wall and used the rocks to be placed on there own property. They made a new retaining wall.

95. On May 2012, we applied for a permit with the Hudson-Essex-Passaic Soil Conservation District to clean the driveway, parking lot area. We were granted the permit. Then we Were denied a permit. Frank Tattoli, Construction Official, did not grant us the permit. We were seeking to replace the macadam pavement which was destroyed by PMK Group and J. Fletcher Creamer & Son Inc. It was destroyed with the excavation machine they brought on the property. They are responsible for the damages caused, at there expense.

96. We are deprived use of our driveway, parking lot area.

Our Constitutional Rights have been violated. In January 2013, Hudson-Essex-Passaic Soil Conservation District holds us liable for soil erosion. We are being fined and violated of three thousand dollars per day. This action was not caused by us. The combination of sewer, storm, and sanitary sewer, removal of live trees, placing new rocks on the site, all have caused erosion to take place on our property. PMK Group and J. Fletcher Creamer & Son Inc. are liable for the damages caused at there expense. The three thousand dollars a day fine has not been removed. We are denied the right to clean our driveway, parking lot area.

97. Mayor Richard Turner never included us into any discussions or participation in regard to our property. On January 31, 2013, Mayor Turner had a telephone conversation with Hudson-Essex Passaic-Soil-Conservation- District. During his conversation with the District which said conversation was being documented, The Mayor discusses our situation with the district. He was "upset with the agency" and felt that we would delay his court hearings and mess it all up referring to the Township and himself taking over the property to restore the property as mandated in Court, (for there own benefit and use). Mayor Turner appears as behind the scenes power broker and influence and controls everything in the Township of Weehawken. We are deprived the use of our property. Konstantinos Natsis is arrested, handcuffed and falsely arrested. His Miranda Rights are not Read. We are being harassed, and bullied. Our Constitutional Right has been violated. The on going pattern does not stop.

98. In 2002, we were denied our rights to vote. See Attached Exhibit F 75. We had to get an Emergency Court Order in order, to vote during Mayor's Election, in the

Township of Weehawken.

99. The Township Officials made threats that they were planning on calling DYFUS to take away our grandchildren.

100. The Township of Weehawken Mayor Turner is wasting our money, Taxpayer's money on unnecessary expenses. He is hiring his own Engineers, Contractors, and Plumbers to do major work on our property. The Mayor, directs the Engineers, and Contractor to design elaborate engineer plans in which it is a waste of our money, Taxpayer's money. This is intentionally done, so as to destroy and worsen the land on the property, we own. The Township concern for the safety and public would have been resolved decades ago. The Mayor does not allow us or issue to our Engineer, Architect, Plumber, and Contractors, apply for permits in order to do work on the property. They are told by the Building Department, Construction Official walk away from the job and not to do any work on our property. Defendants, The Township of Weehawken threatens them if they try to do any work on our property, they will confiscate there license. Then we Plaintiffs are told they cannot do any work on our property because we are in Litigation. The Township of Weehawken will not issue the permit to them or us. They file false allegations and emergency orders taking us to court. They state there facts we have ignored all situation on our property. We have been in contact with many Contractors, Engineers, Architects, and Attorneys. They are playing there political games. The actions by the Defendant, Township of Weehawken constitute a taking of Our property without just compensation in violation of both the United States Constitution and the New Jersey

Constitution Article 1, Paragraph 20.

101. The adjacent property, the driveway area, has the Township of Weehawken DPW trucks park there with garbage in them daily, for the last few years. The odors are horrendous. Many complaints have been made to the Township of Weehawken. This is purposely done to harass us. See Attached Exhibit F 67.

102. The Township of Weehawken Officials are using there political games making it look good for themselves. Townships of Weehawken informs the Sheriffs Department they are planning A "takeover" of the property, to have the property restored, to a stable condition. The property is made of the stabilized hard rock and has been stable for hundreds of years. Township shows an interest in our land. Attached Exhibit F 82.

103. False accusations are made by the Township of Weehawken Officials and several adjacent homeowner's. We are being blamed, harassed, bullied, Konstantinos is Handcuffed, false accusation made of doing major construction on our land. This is the game the Township Politicians play to the residents in Weehawken in trying to take away the property. The Mayor appears as behind the scenes power broker and influence and controls everything in the Township of Weehawken. This is a know fact. He has put us through torturous situations and we have been tyranized for thirteen in half years. We are deprived use and enjoyment of our property as owners in the Township of Weehawken, New Jersey.

104. The property has not been restored by J. Fletcher Creamer & Son, Inc., Liability Insurance at there expense, for the failure that was caused by them. The PMK

Group plans were never followed. It cost over a half a million dollars our money and taxpayer's money to do unnecessary work on our property.

We purchased the land so we may build on it. It cost us approximately six hundred thousand dollars including theft (two times) of our two vehicles with personal belongings inside the Vehicles.

105. As a direct violation of the constitution rights by Defendants, Plaintiff Helen and Konstantinos Natsis suffered general and special damages alleged in this complaint and Entitled to relief under 42 USC § 1983

FIFTH COUNT

106. The actions by the defendant, Township of Weehawken constitute a taking of our property without just compensation in violation of both the United States Constitution and the New Jersey Constitution Article 1, Paragraph 20.

The Township of Weehawken wants to have our property exposed for a force sale.

There are no outstanding liens, sewer charges, or property taxes. They are seeking to take our property away by harassing, bullying, false arrest, handcuff and prosecute us.

REQUEST

107. We are requesting from the US District Court of New Jersey to allow us to remove our long battle of thirteen in a half years of Litigation, out of the State Courts. There is a conflict of interest. There has been an on going pattern of harassment, bullied

and false arrest was of Konstantinos Natsis. The actions by the defendant, Township of Weehawken constitute a taking of our property without just compensation in violation of both the United States Constitution and the New Jersey Constitution Article 1, Paragraph 20.

108. The Defendant J. Fletcher Creamer & Son, Inc. we request, The Traveler's Insurance Company allow them an opportunity to appear on there behalf. Furthermore, the excessive work done on the property, without our consent, and who issued them the authority to proceed for the extensive work done on the property, which has failed. See Attached Exhibit C 86 without our knowledge or input. Also, attached is a CD video of major work done on the property by the Defendants. There has been several test pits done on the property. Our Engineers we hired reviewed the test pits. The work they performed on the property Attached Exhibit C 110. There was no application for the steep slope permit applied for from J. Fletcher Creamer & Son, Inc. did major work on the slope. Our Constitutional Rights have been violated.

109. We request the Defendant PMK Group, to notify their Insurance Company to allow them the opportunity, to appear on there behalf and take the responsibility for the failure that occurred on our property. On there site inspection where did they see the Palisades Cliff going to collapse. False accusation are made that Konstantinos Natsis is chipping away the slope. He always uses garden tools. The Defendant had an opportunity to review all the test pits that have been performed on our property several times by our Expertise Engineers that we have hired. We have not seen the application applied for a Steep Slope Ordinance Permit. They entered our property under emergency

basis. Our Constitutional Rights have been violated.

110. We request the Defendant Mayo Lynch Engineer to provide accurate analysis as to where exactly on the steep slope of the Palisades Cliff, it is going to collapse and where it is being chipped away by Konstantinos Natsis. He is falsely being accused of destroying the steep slope of the Palisades Cliff. The elaborate plans they designed were made in order to take away from our property, and not to be able to build on it. The Defendant had the opportunity to review all the test pits that have been done on the property. Furthermore, there was no application filed for a steep slope permit, since they claimed it was always an emergency. See Attached Exhibit D 89. Our Constitutional Rights have been violated.

111. We request from the Defendant, uphill homeowner Harry & Denise Hodgkinson, provide there Engineer report for the work performed on there property, since it is a slope area. The application applied for a Steep Slope Ordinance permit if the Engineer had the opportunity to address there home is in need of collapse by the chipping, done by Konstantinos Natsis. False accusations and arrest are made that Konstantinos Natsis is destroying the steep slope of the Palisades Cliff and removal of a boulder. See Attached Exhibit C 133 C 157 C 158 D 134. No pictures of Konstantinos removing the boulder was ever shown to us. The false accusations and false complaint filed. Our Constitutional Rights have been violated.

112. The Defendant, Kim Pamperin making false arrest and accusations

and has filed for false arrest complaints. We were not liable for her easement or someone else's actions, as per the Jury's Verdict decision in our favor. Harassment is made against us.

113 The Defendant, Tracy Pamperin making false arrest and accusations and has filed for false arrest complaints. We were not liable for her easement or someone else's actions, as per the Jury's Verdict decision in our favor. Harassment is made against us.

114. The Defendant, Donna Jandik, making false arrest and accusations against us Harassment, Konstantinos Natsis, being blamed for creating a disturbance of sewer discharge and trespass to her property and inside her home. Filing an emergency Court Order, with the help and assistance of Mayor Turner, and Frank Tattoli, Construction Official. In 2004, she received compensation from our homeowner's Insurance Company, New Jersey Manufacturer's of thirty thousand dollars. (Although the same Insurance Company, New Jersey Manufacturer's denied all our coverage's for us).

No Engineer plans for her damages were ever presented. No steep slope ordinance Permit was applied for. Of course, it was all done under emergency situations.

We have been harassed by her many times, for many years. She had her property restored by PMK Group Design and J. Fletcher Creamer & Son, Inc. We had trespass on our property. The beginning part of the CD shows her with the Foreman of J. Fletcher Creamer and Son giving him instructions as to what work she wants done on the property. See Attached Exhibit C 76, C 78, C 82, C 86 D 26 and F 36.

Our Constitutional Rights have been violated.

115. The Defendant Frank Lamolino was looking for bribery. No bribery was ever given to him by us. He started to issue us violations, Stop Order and would not allow us to clean our property. He has harassed us without due reasoning. He did not perform his job as a Building Inspector of Weehawken New Jersey. See Attached Exhibit F 32 and F 39. Our Constitutional Rights have been violated.

116. The Defendant Frank Tattoli continued to harass and bullied us, false accusations are made against us and denial of us receiving permits.

He chases away the Contractors, Architect, and Engineers that we hired. They were advised that there license would be Confiscated if they do any work for us.

But he did not issue any violations to the adjacent homeowner's. He intervened with the neighbors to go against us. We have been harassed and bullied by him.

Did not property perform his job as a Construction Official of Weehawken, New Jersey. He never followed the permits and the plans from PMK Group and J. Fletcher Creamer and Son. He had the Contractors do extensive work for the adjacent neighbor, which was never ordered by the Superior Court. He allowed the uphill homeowner to built retaining walls from loose rocks on a home built on stilts. The rocks failed and ended up in our property. This was intentionally done to destroy our property and harass us. Konstantinos Natsis is arrested. We were blamed, harassed, bullied and accused of causing a Steep Slope Ordinance violation and nuisance to the public. This is on going on for many years. He was never concerned for the safety of our family. We allowed a nearby neighbor to

take some loose rocks from our driveway, parking lot area. Frank Tattoli, forced that neighbor to bring back all the loose rocks we gave him back to our property. Frank Tattoli had no right to intervene in private property. See Attached Exhibit C 90 C 94. He had harassed us for many years. Our Constitutional Rights have been violated.

117. The Defendant, Shawn Materson continually was taking pictures of Konstantinos Natsis working on his garden on the slope. See Attached Exhibit F 55 and F 57. False allegations of criminal charge were filed against Konstantinos Natsis. He is getting his orders from Mayor Richard Turner. Our Constitutional Rights have been violated.

118. The Defendant, Vincent Rivelli allowed the sewer nuisance to continue and trespass on our property, inside and outside our home, for many years. Many complaints were made to him. False accusation and arrest of Konstantinos Natsis was made. As a Health Officer in the Township of Weehawken, he did not help the situation. Our Constitutional Rights have been violated.

119. The Defendant Mayor Richard Turner of Weehawken New Jersey, is the one making sure Konstantinos Natsis is arrested and handcuffed. In May 2002, he confronted me by saying "My family is always in and out of jail. He did not allow us to vote in the Township election of 2002. We had to get an Emergency Court Order from the Superior Court in Jersey City of New Jersey, in order To vot. We have ruined and delayed his Court plans, which involves taking away our Property. See Attached Exhibit C 52. He has bullied, harassed and use his scare tactic. He has caused emotional stress on our family and us. He is using his political game

making it look good for himself.

120. The Defendant Joseph Fell, Attorney has not represented us to the best of his abilities. He has been paid three thousand dollars for legal work for services not rendered, when Konstantinos Natsis, was arrested by the Township of Weehawken. The Ethnic Committee has been notified. There was a conflict of interest.

We have suffered emotional distress and suffered financial damages.

We have been exposed to extensive damages; Our Constitutional Rights have been Violated.

121. The Defendant M&A Demolition and Excavation, Peter applied for a permit. The Township of Weehawken did not issue him the permit. See Attached Exhibit D 64. Our deposit of forty five thousand dollars was not refunded. The first theft of our personal items, occurred in the two vehicles.

We are not able to use and enjoy our property. Our Constitutional Rights have been Violated.

122. The Defendant Avella Garage a/k/a Highpoint has shown harassment against us. They removed our two vehicles from our driveway, parking lot area under the advice of the Township of Weehawken have seized and unlawfully forced and taken away the two vehicles. The Township was informed that these two vehicles were going to be donated to the American Cancer Society. The Township ordered to have them impounded. They were parked in our driveway for seven in half years. They were impounded. It is the second time that we had theft inside the vans. A group of Township Officials, Sergeant and Police Officers

were all viewing our vehicles while they were impounded. The Insurance Company has offered us eight thousand dollars in settlement which we did not accept. The damages and our loss have been extensive. We have been harassed, bullied and our Constitutional Rights have been Violated. See Attached Exhibit F 50.

123. The Defendant A. Robert Paulding a/k/a Paulding Haich Design Architects and Paulding Design Group LLC., has not applied for a permit in the Township of Weehawken. He has kept our deposit of ten thousand dollars. He was fraudulently practicing as a Licensed Architect in the State of New Jersey.

The Township Officials have developed an animosity against us engaging in a pattern of zoning violations, by trying to take away the property by using their influence with parties in the Township of Weehawken.

The malicious prosecution occurred despite the Defendants knowing that there existed no probable cause to the initial arrests of Plaintiff Konstantinos Natsis no probable cause for the continuing of the prosecution against him.

We have suffered emotional distress and suffered financial damages.

We have been exposed to extensive damages. The Township of Weehawken Officials, harassed, blamed, bullied and made false accusations and arrest in Violation of Our Rights Under the Fourth, Fifth, Eighth, and Fourteenth Amendments of the Constitution of the United States.

WHEREFORE, we are requesting against the Defendant's:

- A. an award of compensatory damages against the Defendant jointly and separately.
- B. Awards of cost for the action of us the Plaintiffs, Helen and Konstantinos Natsis.
- C. We have been exposed to extensive damages including but not limited to Attorneys Fees
- D. Engineer Fees
- E. Contractor Fees
- F. Architect Fees
- G. Township of Weehawken Violation Fees
- H. Theft of personal belonging in two vehicles
- I. Container fees for clean-up
Sewer Toxins and mold contaminated, removal of crawl space dirt,
Old cement, old clay pipes and loose rocks in the basement.
- J. Replacement of one new kitchen
- K. Replacement of water heaters
- L. Replacement of washing machines
- M. Removal of all violations, fines and criminal charges imposed.
- N. Permits to be issued to our Engineer Robert Costa
- O. The award of the above fees and costs to us the Plaintiffs Helen and Konstantinos Natsis
- P. Punitive damages, and

Q. Any other relief the Court deems just and appropriate.

JURY DEMAND

We hereby demand a trial by a jury of at least eight (8) persons as to all issues raised in this complaint.

Helen Natsis and Konstantinos Natsis
Pro-Se as Plaintiffs

Helen Natsis

Konstantinos Natsis

Dated: December 3, 2013