

Nathaniel Davis, Esq.
Military Park Building
60 Park Place
Suite 208
Newark, New Jersey 07102
Telephone: (973) 792-9005
Attorney for the Plaintiff,
Patricia Mendez

PATRICIA MENDEZ	:	UNITED STATES DISTRICT COURT
	:	FOR THE STATE OF NEW JERSEY
	:	
Plaintiff (s)	:	
	:	
v.	:	Civil Action No: 2:14-cv-05287
	:	
TOWNSHIP OF WOODBRIDGE,	:	
TOWNSHIP OF WOODBRIDGE POLICE	:	AMENDED COMPLAINT
DEPARTMENT, P.O. E. NELSON, P.O.	:	
MIRDALA, SGT. R. ARTAHA, ABC	:	
CORP. 1-3, and JOHN DOE 1-3	:	
	:	
Defendant(s)	:	

Plaintiff, Patricia Mendez, by his attorney, Nathaniel M. Davis, Esq., complains of defendants, Township of Woodbridge, Township of Woodbridge Police Department, P.O. E. Nelson, P.O. Miralda, Sgt. R. Artaha, ABC CORP. 1-3, and JOHN DOE 1-3, hereinafter referred to as "defendants", and allege as follows:

INTRODUCTION

This action arises under the Fourth, fifth, Sixth, Eighth and Fourteenth Amendments to the United States Constitution; under federal law, specifically, 42 U.S.C. §§1983 and 1988 for an unreasonable use of force to effect an arrest, false arrest; New Jersey Constitution; and the New Jersey common law for battery.

While the individual Defendant was acting in the scope of his employment and under color of state law, he used excessive force to arrest the Plaintiff. The Defendant's actions caused injury to the Plaintiff and he seeks compensatory and punitive damages.

Action is also brought against the Township of Woodbridge and the Township of Woodbridge Police Department for its failure to properly train and/or supervise the individual Defendants in the proper use of force and techniques used to secure an arrest of an individual and for its establishment of policies, procedures, practices, and customs regarding arrests that result in the excessive use of force.

JURISDICTION AND VENUE

1. This action arises under the Constitution of the United States, particularly the Fourth, Fifth, Sixth, Eight and Fourteenth Amendments to the Constitution of the United States, and under the laws of the United States, particularly the Civil Rights Act, Title 42 of the United States Code, Sections 1983 and 1988.

2. The jurisdiction of this court is invoked under the provisions of Title 28 of the United States Code, Sections 1331 and 1343.

3. This court has supplemental jurisdiction pursuant to 28 U.S.C. §1367(a) over any and all state constitutional and state law claims that are so related to the claims within the original jurisdiction of this Court.

4. Venue of this action is proper under 28 USC § 1391(b) because it is where the Plaintiff resides.

PARTIES

5. Plaintiff, Patricia Mendez, is and at all times mentioned was a legal resident of the United States of America, and resident of the State of New Jersey and was and at all times an African American woman.

6. Upon information and belief, and at all times hereinafter mentioned, plaintiff, Patricia Mendez, hereinafter referred to as "Plaintiff".

7. At all times hereinafter mentioned, the defendant, P.O. E. Nelson hereinafter referred to as "Nelson", was employed as a police officer of the Township of Woodbridge and its Police Department. Defendant is sued in his individual and official capacity.

8. At all times hereinafter mentioned, the defendant, P.O. Miralda hereinafter referred to as "Miralda", was employed as a police officer of the Township of Woodbridge and its Police Department. Defendant is sued in his individual and official capacity.

9. At all times hereinafter mentioned, the defendant, Sgt. R. Artaha hereinafter referred to as "Artaha", was employed as a police officer of the Township of Woodbridge and its Police Department. Defendant is sued in his individual and official capacity.

10. At all times hereinafter mentioned, the defendant, Township of Woodbridge was a municipal corporation organized and existing under and by virtue of the laws of the State of New Jersey.

11. At all times hereinafter mentioned, the defendant, Township of Woodbridge Police Department is a department of the Township of Woodbridge and at all times employed the defendant police officers and John Doe 1-3.

12. At all times hereinafter mentioned, the defendants, John Doe 1-3, were employed by the Township of Woodbridge Police Department. Defendants are sued in their individual and official capacities.

13. Upon information and belief, at all times hereinafter mentioned, the

defendants, ABC Corp. 1-3 were departments of the Township of Woodbridge.

14. At the time of the alleged incident and at all times pertinent hereto, Defendants acted under color of law, of a statute, ordinance, regulation, custom, or usage.

STATEMENT OF FACTS

15. On or about September 10, 2013, Plaintiff was parked at or near School 4 & 5 on South Inman Avenue in Woodbridge, New Jersey.

16. At the time in question, the Plaintiff was picking up her children from school and was parked in a legal parking space.

17. The Plaintiff was then approached by P.O. E. Nelson who told her to move her vehicle from the legal parking space even though other people had been parked there previously.

18. The Plaintiff explained to the P.O. E. Nelson that she was picking up her children from school and that the parking space was legal.

19. P.O. E. Nelson in retaliation for the Plaintiff not moving her vehicle ran her license plate to discover that her license plate was expired.

20. P. O. E. Nelson approached the vehicle and asked for the licens and registration.

21. The Plaintiff could not produce her license and registration because she had left it home as she had run out the house to pick up her children from school.

22. The Plaintiff informed the officer that she could not produce the documentation as it was not her car.

23. P.O. E. Nelson became irritated and combative with Plaintiff. As the Plaintiff began to fear for her safety she told her children to exit the vehicle in order to prevent any harm from coming to them.

24. P.O. E. Nelson then began to yell at the Plaintiff do not start the vehicle even though the Plaintiff had not begun to start the vehicle.

25. Plaintiff became even more frightened and moved over to the passenger seat to make sure that there was no indication that she was trying to start the vehicle.

26. P.O.E. Nelson then walked over to the passenger side of the vehicle. At the same time, P.O. Mirdala arrived on the scene.

27. At that time, P.O. E. Nelson then opened the pasenger door and began to grab the the Plaintiff out of the car including pulling her hair. P.O.E. Nelson also punched the Plaintiff in the midst of the struggle.

28. As a result of the assault, the Plaintiff suffered injuries to her had and body.

29. The Plaintiff was taken to the Township of Woodbridge Police Station where she was held for several hours.

30. The Plaintiff was eventually taken to the hospital due to her medical condition.

31. As a result of P.O. E. Nelson's assault on the Plaintiff, the plaintiff suffered severe physical injuries.

32. The Plaintiff was placed into custody, charged with obstruction of the administration of justice and resisting arrest and locked in a cell at the Township of Woodbridge Police Department.

33. The charges were dismissed as to the Plaintiff by the Township of Woodbridge Municipal Court.

FIRST CAUSE OF ACTION
{42 U.S.C. 1983}
DEPRIVATION OF CIVIL RIGHTS
EXCESSIVE USE OF FORCE

34. The Plaintiff incorporate by reference the allegations set forth in all

preceding paragraphs as if fully set forth herein.

35. On or about September 10, 2013, at or about 9:30 am at or near South Inman Avenue, Township of Woodbridge, New Jersey, P.O.E. Nelson hit the Plaintiff's head on a vehicle, grabbed her, and threw her around in a wanton, reckless manner, without justification, willfully, maliciously and intentionally, thus committing a battery on the Plaintiff and inflicting physical and emotional injuries.

36. Plaintiff was unarmed, helpless and not resisting an arrest and in no way posed a threat to P.O.E. Nelson or the safety to any other person.

37. P.O. E. Nelson assaulted and battered Plaintiff with his hands and with mace without any reasonable justification, thereby using excessive force to effect an arrest under the law thereby violating Plaintiff's rights under the laws and Constitution of the United States, in particular the Fourth, Fifth and Fourteenth amendment, 42 U.S.C. § 1983 and his rights under the Constitution of the State of New Jersey.

38. In using unreasonable force on Plaintiff, P.O. E. Nelson violated the departments rules and regulations on the use of force in making arrests of persons who are carrying out a routine activity and either have not committed any crime or infraction or have committed a minor infraction.

39. As a direct and proximate result of the above described unlawful and malicious acts of P.O. E. Nelson, all committed under color of his authority as a police officer and while acting in that capacity, Plaintiff, suffered physical and emotional damages, all of which is in violation of Plaintiff's rights under the Constitution of the United States, in particular the Fourth and Fourteenth amendment, and 42 U.S.C. § 1983.

40. Plaintiff was the victim of punishment administered in a grossly

disproportionate manner to whatever Plaintiff's acts may have been, constituted cruel and unusual punishment, and deprived him of the right to due process of law under the Constitution of the United States, in particular the Fifth, Eight and Fourteenth amendments. The use of force upon plaintiff was unwarranted, unjustifiable and excessive.

41. As a result of the above described acts, Plaintiff was deprived of rights and immunities provided to him, under the Constitution of the United States and of the State of New Jersey including, but not limited to, her rights under the Fourth and Fourteenth amendments to be secure in her person, to be free from punishment without due process, and to the equal protection of the laws.

42. The failure of the Township of Woodbridge, the Township of Woodbridge Police Department, ABC Corp. 1-3 and John Doe 1-3 to provide training and/or supervision regarding the lawful use of force amounts to a deliberate indifference to the safety and lives of the citizens of the Township of Woodbridge. This deliberate indifference to supervision and/or training was a proximate cause of the injuries of Plaintiff.

43. Defendants, Township of Woodbridge, the Township of Woodbridge Police Department, ABC Corp. 1-3 and John Doe 1-3, are directly liable and responsible for the acts of P.O. E. Nelson, because they knowingly failed to enforce the laws of the State of New Jersey and the regulations of the Township of Woodbridge Police Department pertaining to the use of force by the Township of Woodbridge Police Department police officers, thereby creating within the Township of Woodbridge Police Department, an atmosphere of lawlessness in which police officers employ excessive and illegal force in the belief that such acts will be condoned and justified by their superiors. Defendants, Township of Woodbridge, the Township of Woodbridge Police Department, ABC Corp.

1-3 and John Doe 1-3 were, or should have been aware of these unlawful acts and practices prior to and at the time of Plaintiff's physical and emotional injuries.

SECOND CAUSE OF ACTION
VIOLATION OF 42 U.S.C. § 1983
FAILURE TO IMPLEMENT APPROPRIATE POLICIES, CUSTOMS AND
PRACTICES

44. The Plaintiff incorporate by reference the allegations set forth in all preceding paragraphs as if fully set forth herein.

45. Defendants, Township of Woodbridge and the Township of Woodbridge Police Department, as employer and supervisor of P.O. E. Nelson implicitly or explicitly adopted and implemented careless and reckless policies, customs, or practices, that included, among other things, of allowing police officers of the Township of Woodbridge Police Department to confront citizens without any reasonable training in when to use force in effecting arrests and in such a way as to cause the deprivation of Plaintiff's right to be free from unreasonable seizures under the Fourth, Fifth, and Fourteenth Amendments to the Constitution of the United States.

46. The failure of the Township of Woodbridge and the Township of Woodbridge Police Department, as employer and supervisor of P.O. E. Nelson to adequately train and supervise P.O. E. Nelson amounts to deliberate indifference to the rights of Plaintiff to be free from excessive force and unreasonable seizures under the Fourth, Fifth, and Fourteenth Amendments to the Constitution of the United States.

47. As a result of this deliberate indifference to the Plaintiffs' rights, defendants were the proximate cause of the Plaintiff's personal physical and emotional injuries and is entitled to relief under 42 U.S.C. §1983.

THIRD CAUSE OF ACTION
{42 U.S.C. 1983}

48. The Plaintiff incorporate by reference the allegations set forth in all preceding paragraphs as if fully set forth herein.

49. At all times material to the herein complaint, the Township of Woodbridge, acting through the Township of Woodbridge Police Department, had in effect de facto policies, practices, and customs that were a direct and proximate cause of the unconstitutional conduct of the defendants. These de facto policies, practices, and customs include, inter alia: the failure to properly screen, supervise, discipline, transfer, counsel, and/or otherwise control police officers who are repeatedly accused of such acts; and the police code of silence wherein police officers regularly cover up police misconduct and unjustified force and tactics by telling false and incomplete stories or by failing to report the misconduct and unjustified force and tactics by police officers.

50. On information and belief, the defendant, Township of Woodbridge and the Township of Woodbridge Police Department have failed to effectively screen, hire, train, supervise, and discipline their police officers including the defendants, P.O. E. Nelson, for his misconduct and for their failure to protect citizens from unconstitutional conduct of police officers thereby permitting and allowing the defendant, P.O. Nelson, to be in a position to unjustifiably arrest and restrain the Plaintiff and to otherwise cause her injury and violate her federal and state constitutional rights.

51. On information and belief, the Township of Woodbridge and Township of Woodbridge Police Department, maintained an inadequate structure for risk containment

and stress management relative to its police officers and failed to create proper means of containing such risk and managing such stress. Inter alia, the structure was deficient at the time selection of police officers and thereafter during their employment, in its ability to evaluate and exchange information within the command structure about the performance of individual police officers, in its training of supervisory personnel to effectively and adequately evaluate performance of an officer and in its ability to otherwise put the command structure on notice that an individual was at significant levels of risk to the public at large and to the Plaintiff specifically. The effect of this was to permit police officers to function at levels of significant and substantial risk to the public.

52. As a result of the above described policies and customs, the defendant, P.O. E.Nelson, believed that his actions would not be properly monitored by supervisory officers and that misconduct would not be investigated or sanctioned but would be tolerated.

53. That the defendants, and Township of Woodbridge Police Department, failed to adequately and properly hire, train, supervise, discipline, or in any other way control the behavior and performance of the defendant police officers and that the defendants, Township of Woodbridge and Township of Woodbridge Police Department, hiring practices and exercise of police functions and their failure to enforce the laws of the State of New Jersey and the Township of Woodbridge is evidence of the reckless lack of caution in regard to the rights of the public including the Plaintiff in that the defendant police officers exhibited a lack of that degree of due care which prudent and reasonable individuals would show in executing his duties.

50. The failure of the defendants, Township of Woodbridge and Township of

Woodbridge Police Department, to hire, train, supervise, discipline, or in any other way control their employees including the defendant, Sgt. Barry Hunter, in the exercise of the police officers functions in that the defendant, Sgt. Barry Hunter, was and is carried out willfully, wantonly, maliciously, and with such reckless disregard for the consequences so as to display a conscious disregard for the dangers of harm and injury to the Plaintiff.

51. Due the acts of the defendant police officers the failure of the defendants, Township of Woodbridge and Township of Woodbridge Police Department, to discipline and properly train and supervise and promote, Sgt. Barry Hunter, and the continued employment of the officer presented a clear and present danger to the Plaintiff.

52. Although the defendants, Township of Woodbridge and Township of Woodbridge Police Department, knew or should have known of the fact that a pattern of conduct was carried out by its agents, servants, and/or employees including, Sgt. Barry Hunter, have not taken any steps or made any efforts to halt this course of conduct, to make redress to the Plaintiff or other citizens injured thereby or to take any disciplinary action whatever against any of their employees or agents.

53. The above described policies and customs demonstrated a deliberate indifference on the part of policymakers of the defendants, Township of Woodbridge and Township of Woodbridge Police Department, to the constitutional rights of the Plaintiff, and were the proximate cause of the violations of the Plaintiff's rights alleged herein.

54. Plaintiff claims damages for the injuries set forth above under 42 USC §1983 and 42 USC §1988 against the defendants, Township of Woodbridge and Township of Woodbridge Police Department, for violations of the Plaintiff's constitutional rights as set forth above by the defendant police officers acting under color of law

FOURTH CAUSE OF ACTION

55. The Plaintiff incorporate by reference the allegations set forth in all preceding paragraphs as if fully set forth herein.

56. The defendants, P.O. Miralda, Sgt. R. Artaha, failed to protect and intervene in the excessive use of force utilized by P.O. E. Nelson, thereby violating the constitutional and civil rights of the Plaintiff

56. That the defendants, P.O. Miralda and Sgt. R. Artaha, were deliberately indifferent in the treatment given to the Plaintiff.

57. That the aforesaid occurrence to wit: false arrest, imprisonment, assault and battery, violation of civil rights, infliction of emotional distress, and the resulting injuries of mind and body therefrom were caused wholly and solely by reason of the gross negligence or deliberate indifference of the defendants, P.O. Miralda and Sgt. R. Artaha, without any negligence on the part of the Plaintiff.

58. That by reason of the aforesaid, the Plaintiff was injured in mind and body suffered conscious pain and physical injury.

FIFTH CAUSE OF ACTION VIOLATION OF 42 USC §1983 SUPERVISORY LIABILITY RESPONDENT SUPERIOR

59. The Plaintiff incorporate by reference the allegations set forth in all preceding paragraphs as if fully set forth herein.

60. That the defendants, Township of Woodbridge and Township of Woodbridge Police Department, were deliberately indifferent in hiring and/or retaining and/or supervising its employee, defendant police officers in that said employees lacked the experience, deportment, and ability to be employed by the defendants in that the

defendants failed to exercise due care and caution in its employment practices and in particular in hiring, retaining, supervising, training, and promoting the aforementioned employee.

61. That the aforesaid occurrence to wit: false arrest, imprisonment, assault and battery, violation of civil rights, infliction of emotional distress, and the resulting injuries of mind and body therefrom were caused wholly and solely by reason of the gross negligence or deliberate indifference of the defendants, Township of Woodbridge and Township of Woodbridge Police Department, without any negligence on the part of the Plaintiff.

62. That by reason of the aforesaid, the Plaintiff was injured in mind and body suffered conscious pain and physical injury.

SIXTH CAUSE OF ACTION
FALSE ARREST AND IMPRISONMENT

63. The Plaintiff incorporate by reference the allegations set forth in all preceding paragraphs as if fully set forth herein.

64. On or about September 10, 2103, Plaintiff was arrested by defendant police officers for obstruction of the administration of justice and resisting arrest. Plaintiff was detained at the Township of Woodbridge Police Department for several hours prior to being released.

65. Plaintiff was not at the time of the events alleged in this criminal complaint, or at any other time, committing neither any offense against the statutes of the State of New Jersey nor any other ordinances of any municipality.

66. The charges were dismissed as to the Plaintiff.

67. Plaintiff was unlawfully arrested by defendant police officers under color of New Jersey State Law and under color of state law and his official capacity as a Township and within the scope of their employment as a police officer for the Township of Woodbridge Police Department.

68. None of the defendants, at the time of the above mentioned arrest or at any time during the subsequent detention of Plaintiff, had in their possession any warrant issued by any judge, court, or magistrate authorizing an arrest of Plaintiff, nor had any warrant in fact been issued by any court, judge or magistrate for such arrest.

69. Plaintiff was arrested without probable cause by Sgt. Barry Hunter who, under the facts available to him at the time, did not have an objective, good faith belief that Plaintiff committed the aforementioned criminal charge. At no time pertinent hereto did Sgt. Barry Hunter nor any other defendant have probable cause to believe Plaintiff had committed or was committing the aforementioned criminal charge.

70. Plaintiff alleges that P.O. E. Nelson falsely arrested Plaintiff in an attempt to harass and to personally punish the Plaintiff.

71. Plaintiff further alleges that such arrest was in violation of his rights under the Fourth Amendment of the United States Constitution to be free from unreasonable arrest and his right under the Fourteenth Amendment of the United States Constitution to due process of law and the Sixth Amendment to confront his accuser(s).

72. Defendants, and specifically, P.O. Nelson, all acted maliciously, willfully, knowingly, and with specific intent to deprive Plaintiff of her right to freedom from unlawful arrest and detention and malicious prosecution.

73. Each such alleged act committed by defendants were the proximate cause of all injuries and damages to Plaintiff in violation of his constitutional rights secured by the

Fourth, Sixth, and Fourteenth Amendment to the Constitution of the United States, and by Title 42, United States Code, Sections 1983 and 1988.

74. Upon information and belief, at all times material to this complaint, defendant, the Township of Woodbridge, acting through the Township of Woodbridge Police Department, failed to provide training and/or supervision of their police officer's, and this failure amounts to a deliberate indifference to the safety and lives of the citizens of the Township of Woodbridge. This deliberate indifference to supervision and/or training was a proximate cause of the injuries to Plaintiff.

75. Upon information and belief, at all times material to this complaint, defendant, the Township of Woodbridge, acting through the Township of Woodbridge Police Department, had policies, practices, customs and usages which were a direct and proximate cause of the unconstitutional conduct alleged herein, including: (a) unlawful arrest and detention; and (b) excessive force. Each such policy, practice, custom and usage caused injury and damage in violation of Plaintiffs' constitutional rights secured by the Fourth, Sixth, and Fourteenth Amendment to the Constitution of the United States, and by Title 42, United States Code, Sections 1983 and 1988.

SEVENTH CAUSE OF ACTION
New Jersey Common Law
ASSAULT & BATTERY

76. The Plaintiff incorporate by reference the allegations set forth in all preceding paragraphs as if fully set forth herein.

77. By the actions described above, the defendant, Sgt. Barry Hunter, did inflict a battery upon Plaintiff when he intentionally hit the Plaintiff and sprayed Plaintiff with mace or OC spray. The acts and conduct of the defendant, Sgt. Barry Hunter, were the

direct and proximate cause of injury and damage to the Plaintiff in violation of the laws of the State of New Jersey and the United States.

78. Defendant, the Township of Woodbridge Police Department, John Doe 1-3, as employer and supervisor of defendant police officers, are responsible for defendant police officer's battery under the doctrine of Respondeat Superior.

79. Defendant, Township of Woodbridge, their officers, agents, servants, and employees were responsible for Plaintiff's battery under the doctrine of Respondeat Superior.

80. As a result of the foregoing, Plaintiff was deprived of his liberty, suffered specific and serious bodily injury, pain and suffering, emotional distress and psychological injury, great humiliation, loss of income, costs and expenses, and was otherwise damaged and injured.

EIGHTH CAUSE OF ACTION
VIOLATION OF NEW JERSEY STATE CONSTITUTION

81. The Plaintiff incorporate by reference the allegations set forth in all preceding paragraphs as if fully set forth herein.

82. By the aforementioned acts of defendants, defendants have violated Plaintiff's rights under the New Jersey State Constitution including but not limited to Article I, Paragraph 1, Paragraph 5, and Paragraph 12 of the New Jersey State Constitution thereby giving rise to the constitutional protections pursuant to Article I.

83. The conduct and actions, set forth above, of defendants, Sgt. Barry Hunter and John Doe 1-3, acting under color of law, violated Plaintiffs rights under the New Jersey State Constitution and proximately caused the harms, already set forth above, to Plaintiff.

84. The Township of Woodbridge and the Township of Woodbridge Police Department through their officers, agents, servants, and employees violated Plaintiff's rights under the New Jersey State Constitution because they knew or should have known about the lack of training and supervision of police officers and where they made a deliberate choice to follow this willful course of conduct, risking harm to the citizens of the State of New Jersey and proximately causing the harms, as set forth above, to Plaintiff.

NINTH CAUSE OF ACTION
VIOLATION OF 42 USC §1986

85. The Plaintiff incorporate by reference the allegations set forth in all preceding paragraphs as if fully set forth herein.

86. The Plaintiff claims damages for the injuries set forth above under 42 USC §1986 against the defendants, Township of Woodbridge, Township of Woodbridge Police Department, defendant police officers, ABC Corp. 1-3 and John Doe 1-3 for violation of their constitutional rights set forth above by the named defendants in that the defendants in whole or in part neglected to prevent the wrongful actions against the Plaintiff.

ALLEGATIONS

87. As a result of the foregoing, Plaintiff was deprived of her liberty, suffered fear and humiliation, physical injuries, public ridicule, loss of personal reputation, loss of income, costs and expenses, and was otherwise damaged.

88. By reason of the above premises plaintiff is entitled to damages.

89. Plaintiff has incurred attorneys' fees and other expenses in defending himself against defendant's malicious and unreasonable conduct.

90. Defendant acted maliciously and with the intent to injure Plaintiff.
91. By reason of the above premises Plaintiff is entitled to punitive damages.
92. Pursuant to 42 USC § 1988, Plaintiff is entitled to a reasonable allowance for attorneys fees as part of his costs.

PRAYER FOR RELIEF

WHEREFORE, plaintiff, Patricia Mendez requests that this Court:

- (1) Accept jurisdiction over the parties;
- (2) Empanel and charge a jury with respect to this action;
- (3) Award to plaintiff, Patricia Mendez, compensatory and punitive damages with pre and post-judgment interest to compensate him for the injuries he has suffered;
- (4) Order defendants to pay cost of suit
- (5) Order defendants to pay the reasonable attorneys fees and other costs incurred by Plaintiff as provided by Section 1988 of Title 42 and the Civil Rights Acts;
- (6) Award plaintiff, Patricia Mendez, any other relief deemed necessary, just and proper.

Dated: September 2, 2014

Respectfully submitted,

/s/ Nathaniel Davis

Nathaniel Davis, Esq.
Military Park Building
60 Park Place
Suite 208
Newark, New Jersey 07102
Telephone: (973) 792-9005