

UNITED STATES DISTRICT COURT

for the

District of New Jersey

Trenton Division

Case No. 3:17-CV-02169-MAS-LHG

(to be filled in by the Clerk's Office)

Annette L. Steinhardt

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Bernardsvill Borough Council, Bernardsville Police Department, Josh Fowler, Officer Horsey, Brian Kelly, Kevin Sooy, Kevin Valentine, Miles S. Winder III, Sandra Jones, William Ussery, Douglas Brownlie, Brian Hoey, Thomas L. Whitehead, Paul Kelley-aka Walter P. Kelley, Division of Criminal Justice - Sean

Egan

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Annette L. Steinhardt		
Address	6 Bolster Rd. Apt. 2		
	Barre	VT	05641
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Washington		
Telephone Number	908.500.5044		
E-Mail Address	asteinhardt@yahoo.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Bernardsville Borough Council		
Job or Title <i>(if known)</i>	Council		
Address	166 Mine Brook Rd		
	Bernardsville	NJ	07924
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Somerset		

Telephone Number 908.766.3000

E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity

Defendant No. 2

Name

Bernardsville Police Department

Job or Title (if known)

Various Titles

Address

166 Mine Brook Rd

Bernardsville

NJ

07924

City

State

Zip Code

County

Somerset

Telephone Number

908.766.3000

E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity

Defendant No. 3

Name

Josh Fowler

Job or Title (if known)

Records Clerk

Address

166 Mine Brook Rd

Bernardsville

NJ

07924

City

State

Zip Code

County

Somerset

Telephone Number

908.766.3000

E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity

Defendant No. 4

Name

Police Officer Horsey

Job or Title (if known)

Address

166 Mine Brook Rd

Bernardsville

NJ

07924

City

State

Zip Code

County

Somerset

Telephone Number

908.766.3000

E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Plaintiff brings this action under a repeated pattern, practice and treatment which violated various rights particular under the color of the law, State Law, and the Constitution of the United States.

Rights and liberties which were denied, violated, broken, unlawfully conducted, malicious treatment, abuse of power, selective enforcement, gender specific enforcement and treatment, refusal to apply laws that are to be applied in an equal manner to each person in the United States.

Refusal to enforce Municipal, State and Federal laws in an unbiased, equal manner.

Including the following actions and Police Misconduct: Stripping me of rights to prosecute and participate in a trial, years of harassment, loss of private property, loss of personal property, financial loss, undue distress, emotional distress, loss of due process, erroneous prosecution, falsification of insurance records, destruction of records to prevent knowledge of wrong doing, insurance fraud, creating erroneous police and court documentation, falsifying police records and evidence, failure to investigate, Abuse of Power in investigating my personal background to find if I filed a complaint, Retaliation, Malicious prosecution.

The named defendants are all guilty of one or more of the claim statement listed below.

Claim 1. Under the Fifth and Fourteenth Amendment of the Constitution I am entitled to due process and protection of certain rights deemed fundamental from government interference and prohibit state government life, liberty, or property, with due process of law. Procedural due process protects individuals from the coercive power of government by ensuring that adjudication processes under valid laws are fair and impartial.

Claim 2: 39:4-67 / 39.4-136 / 39.4-138- During the timeframe of 1995 to 2016 refusal to enforce.

Claim 3: Statute 2C:14-2 - Allowing a sexual assault to occur against a minor and then destroying the evidence by shredding.

Claim 4: Police Misconduct - Miscarriage of Justice, Obstruction of Justice, intimidation, falsification of evidence, destroying evidence relevant to legal proceedings, falsification of facts, Perjury, police corruption, unwarranted surveillance, unwarranted searches, violations of police procedural policies, parting code of silence. Lack of obeying and enforcing the laws of the Borough, State and Federal laws. Allowing personal feelings and personal friendships to influence decisions. Failure to prosecute criminals. Malice and ill will towards myself and gender.

Claim 5: Insurance Fraud - All occurred in Bernardsville NJ against my property in Bernardsville NJ in 2015 Stephan Siepel made false claims to Allstate Insurance company and submitted a fax to Allstate Insurance Company stating that a valid contract existed on my home and refused to provide a police report for Insurance so I could be reimbursed for my loss. Paul Kelley for refusing and falsifying insurance statements about obtaining a police report. Since I was working with him, after getting assigned by Michael from Somerset County Police department to give a police report. He then wrote a false report when I was clearly working with him and providing documentation. The Bernardsville police department refused to transfer my calls into Paul Kelley when I called on the private line and when they did so I was greeted with dial tone. When I called on the private line I was put through to Paul. Paul refused to answer and address my emails.

Claim 6: Failure to Investigate.-

Claim 7: Using the color of law to charge me with an erroneous crime as punishment, abuse of power, coercion, falsified evidence, destruction of evidence.

Claim 8: Ethics violation of the basic duty of the NJ police enforcement code. Duty of police department is to serve mankind, safeguard lives and property, protect innocent against deception, to protect against intimidation, protect against violence or disorder and to respect the constitutional rights of each individual to liberty, equality and justice.

Claim 9: Selective Enforcement- 1993-2016- Kevin Valentine and the Bernardsville has practiced selective enforcement through the years. In fact I am not the only victim and there are others. Some officers have left the Bernardsville police department over mistreatment from Kevin Valentine and others. 1993 - You have the responding officer to the sexual assault, you have the officer who arrested Kevin's Nephew for drunk driving. He made his life a total hell and he resigned and left Bernardsville police department and is now working for another police department in NJ. You have Paul Kelley who

left unexpectedly leave Bernardsville Police department. In 2015 the last statement I received from Paul is he truly want to assist me but couldn't because of Kevin Valentine. There was the responding officer to my own assault who responded he was directed not to assist me from Kevin Valentine.

Claim 10: Failure to investigate-2001& 2015 with NJ Department of Corruption. Since i requested in writing to a face to face meeting to discuss the sexual assault I was denied. Even in 2015 when they assured me that Brian Hoey would not be able to access their protected database. When I sent them the letter-Sean Eagan's response was he does not have jurisdiction to use this data. Brian is not authorized.

Claim 11: Shredding Evidence - 1993-2015

Claim 12: Police misconduct-hide, destroy evidence

Claim 13: Statute 2C:43-3 and 2C:20-3 - unlawful taking or exercising control over someone elses property. - Seeking financial restitution from the various police departments for this act against my home and personal property. Full well knowing this was going on.

Claim 14: 2C:18-3-allowing trespass to occur on property and fully allowing it to occur.

Claim 15: 2C:17-3-criminal mischief including the following: Criminal damage, criminal mischief, injury to property, malicious destruction to property.

Claim 16: Malicious prosecution-June 20, 2015-I stood before Miles S. Winder III on theft of deception of \$75,000. Prior to this date, I received information that she received a phone call from Robert Martinez that Bill Usserry was going to punish me. Previous to standing trial on June 20, 2015 I was receiving phone messages from patrolman with Bernardsville police and that I was going to be severely punished by Bernardsville Police, Kevin Valentine, Paul Kelly, Miles S. Winder III, Sandra Jones, Brian Kelly. I was informed by Bernardsville police that it didn't matter that my personal or private property was destroyed or stolen. They weren't going to offer assistance and they refuse to offer police escort to my home That I had to give full access to Robert Martinez and all those other people who entered my home without my knowledge or consent.

Claim 17: Retaliation - Since Kevin Valentine was made aware that my attorney met with the Borough Council years prior he has made my life a living hell. In 2015 he had Paul Kelley and Brian Kelly tape and record what would be my last meeting but not to my doing. I still wanted to continue obtaining my police report for insurance. Paul Kelley asked me if I have ever filed a complaint against Bernardsville police. And there started the entire issue with Brian Hoey obtaining and using a witness complaint number which was protected by law.

Claim 18 - stalking, unreasonable search

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- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?
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- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
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III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

In order to document accordingly I have included the claim number above and then provided the required details. All claims occurred in Bernardsville, NJ unless otherwise stated as being related to Thomas L. White, Brain Hoey, Douglas Brownlie; which their location is Somerville, NJ. For NJ Department of Corruption their location is Trenton, NJ and would be for Sean Egan.

Claim 1. Under the Fifth and Fourteenth Amendment of the Constitution I am entitled to due process and protection of certain rights deemed fundamental from government interference and prohibit state government life, liberty, or property, with due process of law. Procedural due process protects individuals from the coercive power of government by ensuring that adjudication processes under valid laws are fair and impartial. During 1993-2016 the Bernardsville police, Kevin Valentine, Paul Kelley, Brian Kelly, officer Steven Seiple left voice mails alerting to the fact that my personal property was stolen and he was not going to assist me with a police report for my insurance company. It was my insurance company that required a police report. Steven Seiple also committed insurance fraud when he claimed to my insurance company that there was a valid contract on my home that directed this illegal alien to destroy and remove all my property. I was the only Deed Owner on this property, and my signature was on a Proposal which is not a contract and my signature is not on it. I did not see this Proposal until I filed a GRC complaint and obtained it. I am also the only person who has lived at that residence for 20 years. However, during this time I was residing in another town for 6 months, taking care of a cancer patient. The Bernardsville police even made statements to my insurance company that I had abandoned my property. I went to my house every few days to get my mail and water some outdoor plants. I shared the phone call, Allstate Insurance and photos of damaged property had gathered and with Somerset County Prosecutors office and they assigned Paul Kelley to work with me to get a police report for my insurance company. I begged Somerset County not to go back to Bernardsville but they said I had to. I do know of a case where another female victim was helped by Somerset County due to being victimized by another police department in Somerset County. Somerset Prosecutors office called Paul Kelley and told him to help me and they gave him my number. When the Bernardsville Police Chief found out that Paul was working with me on getting a police report for insurance he was directed not to. Paul Kelley was made full aware that by still caring for a cancer stricken patient, having no lights or heat in my home and working 3 jobs I was delayed with doing the list and since all my photo albums were destroyed it was a longer timeline to complete. I validated with my insurance company that I had a year to provide them the details. It was very important that I list all items correctly and valued accordingly. So I could be reimbursed and this illegal alien could be prosecuted accordingly. This illegal alien for months, in writing via texts and emails, confirmed he was vacating my home. After 6 months I found he was still and several illegal aliens were in my home; some just got to America the day before. Since there were a group of them and only myself I did not feel safe. The next day I changed the locks to my home which during the first week of June 2015. At that point I started getting numerous calls from Bernardsville police department stating I have to let these illegal aliens into my home. I said no not without a police escort and alerting them to the fact, again, that my home has been stripped bare, and even my bathroom items have been stolen which included: diamonds, gold jewelry, cast iron heater, Italian Marble smashed. I then informed the officer that you are talking over \$100,000 and he laughed and said we have already told you we are not going to help you. That they are refusing to offer a police escort and I am going to be charged with a serious crime which will lead to massive jail time. I then hung up on the patrolman. I was then charged with Theft of Deception \$75,000 which carried a 10 year prison term. I was charged in Municipal court and Miles Winder, III heard the case. What the Bernardsville Police department doesn't know is that a Criminal Attorney reached out to me and instructed me to make no statement and request a jury trial and then it would be moved from Municipal court to Somerset County. Prior to my court date I met with Paul Kelley and Brian Kelley to go over damaged property and values. I then showed him the charge and he ended up taking the document. I didn't think anything about that because at that time I trust Paul Kelley and we shared a mutual acquaintance. This mutual acquaintance ensured me he was trustworthy but they were very wrong. The person who saw Paul Kelley take the charge was Brian Kelley we had met in their statement room. The day of the trial July 2015 Paul Kelley, Illegal Alien - aka Robert Martinez (Osvaldo), Bill Ussery represented Robert Martinez in a police and legal manner. Bill Ussery, Bernardsville Police patrolman, Paul Kelley and the prosecutor had closed door discussions. After I

met with the prosecutor myself and was referred to as "Ms. Piss and Vinegar" as unprofessional that statement is coming from an official legal proceedings coming from that lot it is taken as a complement. From there the prosecutor looked at photos from my phone where I was being accused of "stealing \$75,000" worth of property. The prosecutor showed Bill Ussery and Robert a group of photos and then they both stated "Yes, that's my property". It turns out those photos were taken from 2012 and belonged to either myself or my Father who had passed away earlier that year. The prosecutor then started to ask them if they were in my home during 2012. They then both started to change their story. I then faced Miles Winder III who dismissed my case and then had to sign a document with Sandra Jones. That document is missing from the courts and so is that signed document. This is due to the fact both Paul Kelley and Brian Kelly were made aware I was seeking police pensions for this entire false charge, representing and police representation in a court of law. Paul Kelley and Brian Kelly were made aware of this fact. During the court hearing you could over hear Paul Kelley ask Bill Ussery if he knew anything of the shredding of a sexual assault by Bernardsville Police and a famous boxer who had previously lived in the town. Paul Kelley was made aware of my feeling about Bernardsville shredding of evidence of that which is occurred in the 1990's. The responding officer who had stopped at my home that night and sought my assistance. In 2001 I filed a complaint against Bernardsville because I was assaulted and battered in my driveway and the responding officer came and originally didn't offer assistance since Kevin Valentine had directed his team not to provide police assistance. It was only after I slide down the car and the officer was on the other side and he walked around because I didn't get up and he witnessed myself throwing up blood from the repeated blows. He then charged the person with assault and battery and we were going to Somerset county for trial. I then received a call from Officer Horsey who stated to me that my evidence got in the wrong pile and it was accidentally shredded. I felt the pain the minor of the sexual assault felt and proceeded to file my complaint with the department of corruption. I did not release the responding officer's name due to when Bernardsville shredded the sexual assault evidence the responding officer warned me that they could and possibly inflict bodily harm against myself. There are other women as well who have been assaulted in Bernardsville and where they wanted a court hearing and it never happened.

Claim 2:

Refusal to enforce NJ - 39:4-67 / 39.4-136 / 39.4-138 During the timeframe of 1995 to 2015 the Bernardsville police department has refused to enforce the parking regulations. This is due to the fact that Kevin Valentine has a dislike towards me and has admitted it to the Bernardsville Council and my attorney at the time. When I purchased my home in 1995 neighbors who were renting were utilizing my property for parties and parking. The Bernardsville police department refused to assist me in this matter and Kevin Valentine felt that it was civil. When someone asks someone to remove themselves from your property and they don't it then becomes a police matter. Particular since I had to experience harassment, physical violence, garbage dumping, males grabbing their crotch and peeing on my home. What ended up happening once one of the people were removed from home they then started parking in front of my home giving me an eight foot turn around area. Since I lived on a cliff and was the last home on prior to the dead end it was impossible to get out of the driveway. With a full size Ford Explorer and jet ski I was held captive in my own home as well as my guests. I paid taxes for road plowing services which were denied to me during this time and my garbage pickups did not occur since there was not enough width space for the trucks to get by. My cars averaged 18 to 21 feet long and I hit several cars during my time residing at my residence. The last time I was charged hitting a car, which occurred via a false and erroneous police report. They charged me under a car that I have never driven nor was that car ever in an accident at 40 Mine Ave. Bernardsville, NJ. I paid the fee under a false police report due to the fact I was residing in another State. This occurred at the end of 2015. During the time of 1998 on my attorney had met with the Bernardsville Borough Council and he had reviewed with them the survey of the road and the width. The council ended up coming to my home to survey the area, as well. During that time there was a car parked in my backyard which was unlicensed and did not belong to me. They also noticed other unlicensed cars on the property next to mine. They also informed me that it is illegal to park on the street in the winter at any time and the Borough states that people are supposed to park in their driveway and the Borough doesn't offer on street parking to people. They also pointed out that the entire area has gravel and dirt off the road way for people to park and not be in the road way. That part of the roadway is also wider. The council stated law states you are not impeding the

traffic flow, that you are to leave a width of at least 15 feet on any public roadway. They council woman refused to even park in my driveway because they felt it was unsage and they would have damaged their car while backing out. The council felt that it was a police enforcement issue and they held a meeting with Kevin Valentine and told him to start enforcing the law. In which his reply was that he didn't like me. I feel that the Borough Council full well knew that Kevin Valentine did not enforce law of do the basic requirements of his job and yet they alllowed him to continue to a capacity that he was not able to fulfill without being corrupt. Therefore, the Borough Council and Bernardsville Mayor is negligent and liable for allowing this continue for all these years knowing that Kevin Valentine does not perform his job duties and is corrupt.

Claim 3- 2C:14-2 Allowing a sexual assault to occur against a minor and then destorying the evidence by shredding. between a minor and a professional boxer in Bernardsville NJ on lake road. These occurred approximately 1993 and the exact date and time would be when Micheal Castrilli responded to the call for assistance. The Bernardsville Borough, Borough Council and Mayor of Bernardsville are refusing to turn over the details and documentation of who was working when Mike Castrilli resigned. I plan of putting Mike and Mike Tyson-boxer on the stand. I believe the statute of limitations has not ended on this because the Bernardsville police department used a complaint number to the NJ department of corruption in 2015. Whereas, Brian Hoey with the Somerset County Prosecutors office illegally obtained a sealed and protected complaint and shared it with Kevin Valentine. Full well knowing that he was providing a witness statement to the very department that committed the crime. The letter from Brian Hoey was already submitted as evidence. Per Sean Egan with the NJ department of corruption neither party was privileged to the complaint number 200100258. Let alone using it and refering to it in a letter to myself and to the police department that was complained about. Brian in one full swoop has put a witness in harms way and has made it so that I am no longer safe and secure.

Claim 4: Police Misconduct - Miscarriage of Justice, Obstruction of Justice, intimidation, falsification of evidence, destroying evidence relevant to legal proceedings, falsification of facts, Perjury, police corruption, unwarranted surveillance, unwarranted searches, violations of police procedural policies, particing code of silence. Lack of obeying and enforcing the laws of the Borough, State and Federal laws. Allowing personal feelings and personal friendships to influence decisions. Failure to prosecute criminals. Malice and ill will towards myself and gender.

Claim 5: Insurance Fraud - All occurred in Bernardsville NJ against my property in Bernardsville NJ in 2015 Stephan Siepel made false claims to Allstate Insurance company and submitted a fax to Allstate Insurance Company stating that a valid contract existed on my home and refused to provide a police report for Insurance so I could be reimbursed for my loss. Paul Kelley for refusing and falsing insurance statements about obtaining a police report. Since I was working with him, after getting assigned by Michael from Somerset County Police department to give a police report. He then wrote a false report when I was clearly working with him and providing docuementation. The Bernardsvilel police department refused to transfer my calls into Paul Kelley when I called on the private line and when they did so I was greeted with dial tone. When I called on the private line I was put through to Paul. Paul refused to answer and address my emails.

Claim 6: Failure to Investigate.-

Claim 7: Using the color of law to charge me with an erroneuous crime as punishment, abuse of power, cohersion, falsified evidence, destruction of evidence. This occurred on June 20, 2015 whereas, I stood infornt of Miles S. Winder. III on charges brought against me of theft of deception of \$75,000 in municipal court of Bernardsville. Bill Usserry was there representing Robert (Osaldo) Martinez, Paul Kelley was presnet due to Michael from Somerset County. At a date prior to my court hearing Paul Kelley infront of Brian Kelley asked to see the charge and then proceeded to take it and did not give it back. Due to the instructions of my criminal defense attorney I was directed to ask for a jury trial and make no comments. Paul Kelley and Brian Kelly knew I was going to do this. Paul Kelley called the patrolman who was leaving me messagaes on my phone about how I was going to be punished. Out of the court room and held private discussions with Bill Usserry, Robert Martinez and the prosecutor. I was left sitting on a bench. The prosecutor came back and told me charges were going to be dismissed and I once again stood in fornt of Miles S. Winder III who informed me "I bet you feel lucky and relieved" Sandra Jones then had me sign a document. This document is missing, along with other facts from this hearing. Since the Bernardsville police once again used there position for there own personal

gains.

Claim 8: Ethics violation of the basic duty of the NJ police enforcement code. Duty of police department is to serve mankind, safeguard lives and property, protect innocent against deception, to protect against intimidation, protect against violence or disorder and to respect the constitutional rights of each individual to liberty, equality and justice.

Claim 9: Selective Enforcement- 1993-2016- Kevin Valentine and the Bernardsville has practiced selective enforcement through the years. In fact I am not the only victim and there are others. Some officers have left the Bernardsville police department over mistreatment from Kevin Valentine and others. 1993 - You have the responding officer to the sexual assault, you have the officer who arrested Kevin's Nephew for drunk driving. He made his life a total hell and he resigned and left Bernardsville police department and is now working for another police department in NJ. You have Paul Kelley who left unexpectedly leave Bernardsville Police department. In 2015 the last statement I received from Paul is he truly want to assist me but couldn't because of Kevin Valentine. There was the responding officer to my own assault who responded he was directed not to assist me from Kevin Valentine. There are other assault and battery victims in which charges and / or being able to seek justice in a court of law where denied to female victims. Some way before the lawsuit that Bernardsville lost for Sexual harassment in which Timothy Beck was also the Bernardsville Police and Town Council Attorney.

Claim 10: Failure to investigate- 2001 & 2015 with NJ Department of Corruption. Since I requested in writing to a face to face meeting to discuss the sexual assault I was denied. Even in 2015 when they assured me that Brian Hoey would not be able to access their protected database. When I sent them the letter- Sean Eagan's response was he does not have jurisdiction to use this data. Brian is not authorized. For Bernardsville Police department from 2014-2016 for the crimes committed against my personal and private property located in Bernardsville NJ, Against Brian Hoey, Douglas Brownlie, Thomas L. White. When Thomas received a small sample of my damaged property he did nothing with it. Never reached out, never asked why. For Douglas Brownlie whose statement was a complete and through investigation occurred with the Somerset County Prosecutors office. It was until a GRC complaint was fulfilled where Somerset county prosecutors office admitted that no investigation occurred on their behalf but only that had taken a written and verbal communication with Bernardsville that a complete and through investigation occurred. Whereas, they had no evidence of any investigation even though they made the claim. This can also be found in a letter I received from Douglas Brownlie.

Claim 11: Shredding Evidence - 1993-2015 Bernardsville Borough Police with the shredding of the sexual assault that occurred in 1993 timeframe. Bernardsville police, Miles S. Winder III, Sandra Jones, Kevin Valentine, Paul Kelley, Brian Kelley Shredding and removing my criminal charge in Municipal court of Bernardsville. Bernardsville police department, Officer Horsey Shredding my assault and battery in 2001 which led me to file the complaint of shredding of evidence if the sexual assault.

Claim 12: Police misconduct-hide, destroy evidence - The Bernardsville police department, Kevin Valentine, Brian Kelly, Stephen Siepel, Paul Kelley, Bill Usserry hiding and destroying evidence of my criminal charge in Bernardsville Municipal court, for hiding evidence of a crime committed against myself, my personal and private property, for covering up true facts of the case and mislead a court of law so I could not prosecute or get justice in Somerset County Superior Court.

Claim 13: Statute 2C:43-3 and 2C:20-3 - unlawful taking or exercising control over someone else's property. - Seeking financial restitution from the various police departments for this act against my home and personal property. Full well knowing this was going on.

Claim 14: 2C:18-3-allowing trespass to occur on property in Bernardsville NJ and fully allowing it to occur. This is against Paul Kelley, Brian Kelly, Kevin Valentine, Bill Usserry, Stephan Siepel all of Bernardsville

Claim 15: 2C:17-3-criminal mischief including the following: Criminal damage, criminal mischief, injury to property, malicious destruction of property which occurred in Bernardsville NJ and against the Bernardsville police department, Kevin Valentine, Paul Kelley, Brian Kelly, Stephan Siepel.

Claim 16: Malicious prosecution-June 20, 2015-I stood before Miles S. Winder III on theft of deception of \$75,000. Prior to this date, I received information that she received a phone call from Robert Martinez that Bill Usserry was going to punish me. Previous to standing trial on June 20, 2015 I

was receiving phone messages from patrolman with Bernardsville police and that I was going to be severely punished by Bernardsville Police, Kevin Valentine, Paul Kelly, Miles S. Winder III, Sandra Jones, Brian Kelly. I was informed by Bernardsville police that it didn't matter that my personal or private property was destroyed or stolen. They weren't going to offer assistance and they refuse to offer police escort to my home. That I had to give full access to Robert Martinez and all those other people who entered my home without my knowledge or consent.

Claim 17: Retaliation - Since Kevin Valentine was made aware that my attorney met with the Borough Council years prior he has made my life a living hell. In 2015 he had Paul Kelley and Brian Kelly tape and record what would be my last meeting but not to my doing. I still wanted to continue obtaining my police report for insurance. Paul Kelley asked me if I have ever filed a complaint against Bernardsville police. And there started the entire issue with Brian Hoey obtaining and using a witness complaint number which was protected by law not to be released. On-going allowing injury to property, malicious destruction to property. I was even charged in Nov. 2015 of hitting a car that was parked in the roadway giving 8 feet to get out of my driveway. I hit the car by accident since my car is ~18 feet long. I was charged by Bernardsville police department against a car I never drove and license plates for a owner that will state there car was never in Bernardsville, NJ.

Claim 18 - stalking and unreasonable search- In 2015 when I worked part time for A&P in Basking Ridge various Bernardsville police would come into the store and check out in my line. This got so bad that Management or Night crew would follow me to my car because you could see a police car parked close by. On one account Kevin Valentine stood in the line for roughly 10 minutes allowing others to cut in front of him. Staring at me. When I would go to work at my day job at MetLife in Bridgewater, NJ I was followed by various police cruises. One time I even walked up on Paul Kelley and Brian Kelly parked next to my car at MetLife in Bridgewater, NJ. When I would meet a mutual friend of Paul Kelley and myself she started to ask me questions that I never discussed with her. One of such questions was who was my biological father as asking why the father's name was listed blank. I did not tell her who he was and found the question rather odd.. Especially since he had died years prior. That document was sealed by a Judge for a reason and Bernardsville police department had no due cause to try to obtain this information. They did an unjustified investigation for their own personal gain. During this time I also witnessed Bernardsville police car parked across the street. I had my sunroof open and could hear the patrolman report back to the Bernardsville about myself getting home. One time while going for coffee at the local Starbucks I even turned around to see a police officer reach for his gun and was right behind me in my personal space. Since I no longer felt safe I moved in Jan 1, '16 to another state since I could no longer bear the harassment and stalking.

B. What date and approximate time did the events giving rise to your claim(s) occur?

1993 - 2016

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

The underlying facts about my claim are listed above and after losing \$325,000 due to my property being destroyed, stolen and the Bernardsville Police department covering up and making sure I did not reimbursed for my loss, that I continue to suffer malious treatments by the Bernardsville Police Department. That each department listed within this claim has done nothing but cover up for one another. Yes, Paul Kelley's previous employer and is wife were involved in this. Paul Kelley had worked nights as a painter to get through Graduate School.

I would also like the courts to uphold a law in which police can be charged in Federal court the of the very crimes they covered up. These charges I would request the court to consider are of the following: Tresspass, Criminal Michief, Grand Larceny against the following: Kevin Valentine and Paul Kelley.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Prior to 2016 I had to be placed on heart medication, Anti-Anxiety medication. I have been diagonised with PTSD order from all the injustices the Bernardsville Police, The Bernardsville Borough, Mayour has put me through for all these years. These medications were issued from my 20's all while being a witness to a cirme that was covered up by the very department that was suppose to uphold the law. In 2015 for the loss of my home, my property, the emotional distress caused with losing personal property that never can be replaced and the overall loss of \$325,000 in loss of home and over \$100,000 of assets that were either destoryed of stolen. This is towards the Bernardsville Borough, Bernardsville Mayor, Kevin Valentine, Brian Kelly, Stephan Siepel, Brian Hoey, Douglas Brownlie.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I would like the court to allow this case to proceed so due process can proceed. I claim relief for the actual financial loss and devaluation of my home which was in the amount of \$325,000.. I am seeking monetary relief for the \$100,000 loss of personal property and property that belonged to my home. For 20 years of Pain Suffering, Emotional Distress - \$15,000,000 caused by the Bernardsville Police department, Borough Council and Mayor of Bernardsville. For monetary relief of punitive damages in the amount of \$35,575,000

Claim 1- Monetary relief for emotional distress of \$2,000,000 for the Constitution of the United States and \$1,000,000 in punitive damages.

Claim 2 -Monetary relief of \$1,000,000 for emotional distress. \$2,575,000 for punitive damages- 20 years of having to deal with the Bernardsville police, Borough of Bernardsville, Mayor of Bernardsville to allow this situation to continue and for not making sure things were being followed when they were full aware that they weren't

Claim 3 - Monetary relief for pain and suffering, emotional distress of \$1,000,000-for having to carry with me the fact that the Bernardsville police department shredded evidence of a sexual assault. For the pain and damage this has caused myself. Not being able to trust police, to always be on guard, I had tried so hard to get her justice. You have no idea the pain and suffering and guilt I have had to carry with me all these years. I am truly heart broken. To do this to a victim and her family. Additional \$1,000,000 for punitive damages.

Claim 4 - Monetary relief of \$2,000,000 for personal distress for police misconduct. Additional \$2,000,000 for punitive damages.

Claim 5 - Monetary relief for the actual financial loss I incurred. \$325,000 for the actual value decreased to my home; for another \$100,000 for the property that was stolen and / or destroyed

Claim 6 - Monetary relief for \$425,000 for actual financial loss and \$1,000,000 punitive damages

Claim 7 - Monetary punitive damages for \$4,000,000 and additional \$2,000,000 or emotional distress and malicious treatment.

Claim 8 - Monetary punitive damages for \$2,000,000

Claim 9- Monetary punitive damages of \$1,000,000 plus the pension of Kevin Valentine.

Claim 10- Monetary punitive damages of \$1,000,000 and \$2,000,000 for emotional distress with the loss of my property and pain of property that can never be replaced.

Claim 11-Monetary punitive damages of \$1,000,000

Claim 12-Monetary punitive damages of \$1,000,000-plus the pension of Brian Horsey who obtained a witness complaint number and used it in a letter.

Claim 13-Monetary punitive damages of \$1,000,000

Claim 14 - Monetary punitive damages of \$1,000,000

Claim 15-Monetary punitive damages of \$1,000,000

Claim 16- Monetary punitive damages of \$7,000,000 plus the pension of Bill Ussery, Since Paul Kelley does not have a pension and his salary is over \$90,000. I am seeking a fine of \$50,000.Plus \$2,000,000 for emotional distress

Claim 17 - Monetary punitive damages of \$1,000,000

Claim 18 - Monetary punitive damages of \$2,000,000 and \$2,000,000 for emotional distress for 20 years.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 8.14.17

Signature of Plaintiff

Printed Name of Plaintiff

Annette L. Steinhardt

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

Pro Se (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Case Number: 3:17-CV-02169-MAS-LHG

Continuation of Defendants

Defendant No. 5

Name: Brian Kelly

Title: Detective

Address: 166 Mine Brook Rd
Bernardsville, NJ 07924

County: Somerset

Telephone: 908.766.3000

X – Individual capacity & X – Official capacity

Defendant No. 6

Name: Kevin Sooy

Title: Mayor

Address: 166 Mine Brook Rd
Bernardsville, NJ 07924

County: Somerset

Telephone: 908.766.3000

X – Official capacity

Defendant No. 7

Name: Kevin Valentine

Title: Chief

Address: 166 Mine Brook Rd
Bernardsville, NJ 07924

County: Somerset

Telephone: 908.766.3000

X – Individual capacity & X – Official capacity

Defendant No. 8

Name: Miles S. Winder III

Title: Former Municipal Judge, Current Known Title Prosecutor for Bernardsville

Address: 166 Mine Brook Rd
Bernardsville, NJ 07924

County: Somerset

Telephone: 908.766.3000

X – Individual capacity & X – Official capacity

Pro Se (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Case Number: 3:17-CV-02169-MAS-LHG

Continuation of Defendants

Defendant No. 9

Name: William Ussery

Title: Retired Chief of Police Bernardsville

Address: 32 Mine Ave.

Bernardsville, NJ 07924

County: Somerset

Telephone: Unknown

X – Individual capacity & X – Official capacity

Defendant No. 10

Name: Douglas Brownlie

Title: Unknown – Has lied in the past about job title

Address: 40 N. Bridge St.

Somerville, NJ 08876

County: Somerset

Telephone: 908.575.3300

X – Official capacity

Defendant No. 11

Name: Brian Hoey

Title: Captain

Address: 40 N. Bridge St.

Somerville, NJ 08876

County: Somerset

Telephone: 908.575.3300

X – Individual capacity & X – Official capacity

Defendant No. 12

Name: Thomas L. Whitehead

Title: Unsure

Address: 40 N. Bridge St.

Somerville, NJ 08876

County: Somerset

Telephone: 908.575.3300

X – Official capacity

Pro Se (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Case Number: 3:17-CV-02169-MAS-LHG

Continuation of Defendants

Defendant No. 13

Name: Paul Kelley (aka Walter P. Kelley)

Title: Detective

Address: 25 Kirkpatrick St

3rd Floor

New Brunswick, NJ 08901

County: Middlesex

Telephone: Unknown

X – Individual capacity & X – Official capacity

Defendant No. 14

Name: Sean Egan

Title: Unknown

Address: Division of Criminal Justice

25 Market Street

Trenton, NJ 08625-0085

County: Mercer

Telephone: 609.984.6500

X – Official capacity

Defendant No. 14

Name: Sandra Jones

Title: Clerk

Address: 166 Mine Brook Rd

Bernardsville, NJ 07924

County: Somerset

Telephone: 908.766.3000

X – Official capacity