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Attorney(s) for Plaintiff(s): NANCY RITSCHEL, CINDY RULLO, RACQUEL RULLO and HEATHER RULLO,

NANCY RITSCHEL, CINDY RULLO, RACQUEL RULLO and
HEATHER RULLO,

Plaintiff(s)

vs.

MORRIS COUNTY PROSECUTOR'S OFFICE, MAYOR AND
COUNCIL OF FLORHAM PARK, FLORHAM PARK POLICE
DEPARTMENT, DETECTIVE BRIAN FORD OF THE FLORHAM
PARK POLICE DEPARTMENT and JOHN DOES 1-3,

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
MORRIS COUNTY

DOCKET NO.: MRS-L-3375-13

CIVIL ACTION

Summons

FROM THE STATE OF NEW JERSEY

To the Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is provided and available in the Civil Division Management Office in the county listed above or online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$ 135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

31 - Summons - Law or Chancery Divisions
Superior Court - Appendix XII-A - CN 10792
Rev. 9/4/12 Effective 9/4/12 P10/13

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If you cannot afford an attorney, you may call the Legal Services Office in the county where you live or the Legal

eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is provided and available online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Dated: **January 15, 2014**

15/ Jennifer M. Perez
Jennifer M. Perez
Clerk of the Superior Court

Name of Defendant to be Served: **Florham Park Police Department**

Address of Defendant to be Served: **111 Ridgedale Avenue, Florham Park, NJ 07932**

ATLANTIC COUNTY
Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Floor
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY
Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main Street
Hackensack, NJ 07601
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY
Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Floor, Courts Facility
49 Rancocas Road
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

CAMDEN COUNTY
Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice, First Floor
101 South Fifth Street, Suite 150
Camden, NJ 08103
LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY
Deputy Clerk of the Superior Court
9 North Main Street
Cape May Court House, NJ 08210
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY
Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street, P.O. Box 10
Bridgeton, NJ 08302
LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

ESSEX COUNTY
Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-6204
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY
Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake, First Floor, Court House
1 North Broad Street
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY
Deputy Clerk of the Superior Court
Superior Court, Civil Records Department
Brennan Court House, First Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY
Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822
LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY
Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 South Broad Street, P.O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY
Deputy Clerk of the Superior Court
Middlesex Vicinage
Second Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY
Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY
Morris County Courthouse
Civil Division
Washington and Court Streets
P.O. Box 910
Morristown, NJ 07963-0910
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY
Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08754-2191
LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY
Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY
Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079
LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

SOMERSET COUNTY
Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY
Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY
Deputy Clerk of the Superior Court
First Floor, Court House
2 Broad Street
Elizabeth, NJ 07207-6073
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY
Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500
LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

Updated: 8/21/13

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Attorneys for Plaintiff, Nancy Ritschel

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CLERK OF COURT

NANCY RITSCHER, CINDY RULLO, RACQUEL*
RULLO and HEATHER RULLO, *

Plaintiffs, *

vs. *

MORRIS COUNTY PROSECUTOR'S OFFICE, *
MAYOR AND COUNCIL OF FLORHAM PARK, *
FLORHAM PARK POLICE DEPARTMENT, *
DETECTIVE BRIAN FORD OF THE FLORHAM *
PARK POLICE DEPARTMENT and JOHN DOES *
1-3, *

Defendants. *

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION : MORRIS COUNTY

DOCKET NO.: MRS-L- 3375- 13

CIVIL ACTION

COMPLAINT AND
JURY DEMAND

Plaintiffs residing in the Township of East Hanover, County of Morris Sussex by way of
Complaint against the Defendants state:

BACKGROUND

1. On or about December 28, 2011, the Defendant Brian Ford, a member of the Florham Park Police Department, went to the Morris County Prosecutor's Office and obtained a warrant to search various premises associated with the Plaintiff, Nancy Ritschel.

2. John Doe, a member of the Morris County Prosecutor's Office approved the warrant described above. The same was submitted to the Honorable Philip J. Maenza, J.S.C. who signed the same.

3. Armed with the warrant which was obtained as the result of a purposely flawed warrant, searched the Plaintiff's home, motor vehicles and her place of employment.

4. The Defendant Brian Ford and John Does entered the premises of the Plaintiff, removed items belonging to the Plaintiff and retained the same for more than a year.



5. The Defendants herein never had probable cause to seek a warrant. Defendant from the Florham Park Police Department never investigated statements by third parties, never determined that statements given to them were false but acted without investigation and with malice.

6. The Defendants appeared at the home of the Plaintiff with nine police cars and embarrassed the Plaintiff Nancy Ritschel both in her personal life and in her business life.

7. Items seized by the various Defendants were destroyed.

8. The Florham Park Defendants held the Plaintiffs Cindy Rullo, Racquel Rullo and Heather Rullo incommunicado for a long period of time, would not let them communicate with their mother and detained them.

COUNT ONE

1. Plaintiffs repeat each and every allegation as if set forth at length herein.

2. The Mayor and Council of Florham Park, as well as supervisors within the Florham Park Police Department, did not properly train Detective Brian Ford.

3. As a result of the improper training, the said Defendant Ford applied for and obtained a warrant without proper investigation based upon statements that were known to be false.

4. As a result of the improper conduct of the Defendants described herein, the Plaintiff and her daughters were humiliated, embarrassed, injured and suffered the loss of their freedom as well as personal property.

WHEREFORE, Plaintiffs demand judgment for compensatory and punitive damages, costs of suit and attorney fees.

COUNT TWO

1. Plaintiffs repeat each and every allegation as if set forth at length herein.

2. Defendant Brian Ford failed and refused to investigate false statements given to him by third parties and embarked upon a course of conduct which led to the injuries sustained by the Plaintiff Nancy Ritschel and her daughters Cindy Rullo, Racquel Rullo and Heather Rullo.

WHEREFORE, Plaintiffs demand judgment for compensatory and punitive damages, costs of suit and attorney fees.

COUNT THREE

1. Plaintiffs repeat each and every allegation as if set forth at length herein.
2. All of the Defendants named herein were instrumental in causing the damages sustained by the Plaintiffs.

WHEREFORE, Plaintiffs demand judgment for compensatory and punitive damages, costs of suit and attorney fees.

COUNT FOUR

1. Plaintiffs repeat each and every allegation as if set forth at length herein.
2. John Doe, a member of the Morris County Prosecutor's Office, approved without probable cause a warrant to be submitted to a Superior Court Judge for the purpose of searching the residence, motor vehicles and the business property of the Plaintiff without just cause.

WHEREFORE, Plaintiffs demand judgment for compensatory and punitive damages, costs of suit and attorney fees.

COUNT FIVE

1. Plaintiffs repeat each and every allegation as if set forth at length herein.
2. A representative of the Morris County Prosecutor's Office, John Doe, and Detective Brian Ford of the Florham Park Police Department, together prepared and Affidavit and Search Warrant to be submitted to a Superior Court Judge.
3. The Affidavit to be submitted was without investigation, was prepared with malice and submitted to a Superior Court Judge.
4. As a result of the activity of John Doe and Brian Ford, the Plaintiff and her daughters suffered damage.

WHEREFORE, Plaintiffs demand judgment for compensatory and punitive damages, costs of suit and attorney fees.

COUNT SIX

1. Plaintiffs repeat each and every allegation as if set forth at length herein.
2. Defendant Brian Ford and others mentioned herein, falsely imprisoned the Plaintiff and her daughters, held them incommunicado, and caused damage as described above.

WHEREFORE, Plaintiffs demand judgment for compensatory and punitive damages, costs of suit and attorney fees.

COUNT SEVEN

1. Plaintiffs repeat each and every allegation as if set forth at length herein.
2. Defendants herein together and individually violated the Civil Rights of the Plaintiffs.

WHEREFORE, Plaintiffs demand judgment for compensatory and punitive damages, costs of suit and attorney fees.

JURY DEMAND

The Plaintiffs hereby demands a trial by jury.

TRIAL COUNSEL DESIGNATION

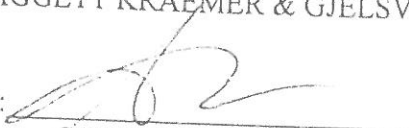
Pursuant to Rule 4:25-4, George T. Daggett, Esq. has been designated as trial counsel on behalf of Plaintiffs in the above-captioned matter.

CERTIFICATION

1. Pursuant to Rule 4:5-1, the undersigned hereby certifies that at the time of filing of this pleading, the matter in controversy is not the subject of any other action pending in any Court and/or Arbitration proceeding.
2. I also understand that at this time there are no other parties to my knowledge that should be named in this lawsuit.
3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DAGGETT KRAEMER & GJELSVIK

By:



GEORGE T. DAGGETT

Dated: December 23, 2013