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Attorneys for Plaintiff, HEATHER WILLIAMSON-HUGHES

**HEATHER  
WILLIAMSON-HUGHES,**

**Plaintiff(s),**

**vs.**

**LAMBERTVILLE CITY POLICE  
DEPARTMENT, TRENTON  
POLICE DEPARTMENT, THE  
CITY OF LAMBERTVILLE, THE  
COUNTY OF HUNTERDON,  
HUNTERDON COUNTY  
PROSECUTOR'S OFFICE  
-NARCOTICS TASK FORCE UNIT,  
SERGEANT GRAMLICH,  
OFFICER V. ALBANI, JOHN  
DOES POLICE OFFICERS and/or  
OFFICIALS 1-10, THE STATE OF  
NEW JERSEY,**

**Defendant(s).**

**SUPERIOR COURT OF NEW JERSEY  
MERCER COUNTY/LAW DIVISION  
DOCKET NO.**

**CIVIL ACTION**

**COMPLAINT AND JURY DEMAND**

Plaintiff, HEATHER WILLIAMSON-HUGHES residing at 57 Willis Drive, in the City of Ewing, in the County of Mercer and in the State of NJ 08628, by way of complaint against defendant says:

**STATEMENT OF FACTS**

1. On November 14, 2016, plaintiff, HEATHER WILLIAMSON-HUGHES, was a business invite in the parking lot of Lambertville Fine Foods and Flowers, 76 Bridge Street, in the City of Lambertville, County of Hunterdon and State of New Jersey.

2. At the same time and place, Defendants, SERGEANT GRAMLICH, OFFICER V. ALBANI, HUNTERDON COUNTY PROSECUTOR'S OFFICE-NARCOTIC TASK FORCE UNIT, LAMBERTVILLE CITY POLICE DEPARTMENT, TRENTON POLICE DEPARTMENT, THE CITY OF LAMBERTVILLE, THE COUNTY OF HUNTERDON, JOHN DOES POLICE OFFICERS and/or OFFICIALS 1-10, THE STATE OF NEW JERSEY, were conducting a "Buy and Bust" operation.

3. Plaintiff, HEATHER WILLIAMSON-HUGHES had been at a wellness check for her recent c-section incision with her four (4) day old infant son at Phillips Barber Family Health and stopped at the Lambertville Fine Food and Flowers to purchase some food, parking her vehicle in the store's parking lot.

4. Plaintiff, HEATHER WILLIAMSON-HUGHES opened her purse and to look for money to make a purchase.

5. When plaintiff, HEATHER WILLIAMSON-HUGHES, looked up from her purse, she observed a man in plain clothing approach her vehicle from behind with a gun drawn and pointed at her. Plaintiff then looked to her right and saw three (3) more men approaching her vehicle, with guns drawn. Two (2) of these individuals were dressed in police uniforms including bullet proof vests.

6. Defendants, SERGEANT GRAMLICH, OFFICER V. ALBANI and JOHN DOE POLICE OFFICERS, maliciously and baselessly yelled to plaintiff, HEATHER WILLIAMSON-HUGHES, to “put your hands up, Get your hands up, Don’t move, Let me see your hands.”

7. Plaintiff, HEATHER WILLIAMSON-HUGHES slowly stepped toward the officers with her hands deferentially raised in the air, showing that she was not a threat

8. Defendants, SERGEANT GRAMLICH, OFFICER V. ALBANI and JOHN DOE POLICE OFFICERS, continued to verbally and mentally terrorize and confuse plaintiff by reaching in her vehicle, take her phone, hang up on the conversation plaintiff was having, and yelling different commands and questions at plaintiff.

9. Defendants, SERGEANT GRAMLICH, OFFICER V. ALBANI and JOHN DOE POLICE OFFICERS, next requested plaintiff to produce and hand her identification to them and step out of her vehicle. Plaintiff also reminded defendants that her infant son was in the vehicle.

10. Defendants, SERGEANT GRAMLICH, OFFICER V. ALBANI and JOHN DOE POLICE OFFICERS continued to interrogate plaintiff about her actions that day, where she had been and why, questioning why she choose a physician in Lambertville and why not a doctor in Trenton, New Jersey.

11. After a period of time Plaintiff, HEATHER WILLIAMSON-HUGHES’ phone rang and defendants again became belligerent, verbally and mentally assaulting plaintiff.

12. As a direct and proximate cause of the negligence, the plaintiff, HEATHER WILLIAMSON-HUGHES, suffered severe mental anguish, incapacity for the loss of enjoyment of life, injury to reputation, incurred medical costs and expenses, and household and maintenance expenses. These injuries are permanent in nature and plaintiff will continue to suffer such losses for the remainder of her life.

WHEREFORE, Plaintiff, HEATHER WILLIAMSON-HUGHES demands judgment against defendants for compensatory and consequential damages, including damages for emotional distress, humiliation, loss of enjoyment of life, and other pain and suffering on all claims allowed by law in an amount to be determined at trial;

- a) economic losses on all claims allowed by law;
- b) special damages in an amount to be determined at trial;
- c) punitive damages on all claims allowed by law against individual Defendants and in an amount to be determined at trial;
- d) attorneys' fees and the costs associated with this action; and
- e) any further relief that this court deems just and proper

**NOTICE OF CLAIMS**

Plaintiff, HEATHER WILLIAMSON-HUGHES, in furtherance of her stated cause of action, filed timely a Notice of Claim against the Hunterdon County Prosecutor, State of New Jersey, City of Lambertville, Lambertville City Police Department, Hunterdon County Sheriff Trenton Police Department, and the New Jersey State Police in compliance with N.J.S.A. 59:8-4.

**COUNT I**  
**NEGLIGENCE AGAINST DEFENDANTS, HUNTERDON COUNTY PROSECUTOR'S**  
**OFFICE-NARCOTIC TASK FORCE UNIT, LAMBERTVILLE CITY POLICE**  
**DEPARTMENT, TRENTON POLICE DEPARTMENT, THE CITY OF LAMBERTVILLE,**  
**THE COUNTY OF HUNTERDON, JOHN DOES POLICE OFFICERS and/or OFFICIALS**  
**1-10, THE STATE OF NEW JERSEY**

13. Plaintiff, HEATHER WILLIAMSON-HUGHES, adopts and realleges the allegations contained in paragraphs 1 through 12 inclusive as if set forth fully herein.

14. At all times material hereto, the defendants, HUNTERDON COUNTY PROSECUTOR'S OFFICE-NARCOTIC TASK FORCE UNIT, LAMBERTVILLE CITY POLICE DEPARTMENT, TRENTON POLICE DEPARTMENT, THE CITY OF THE LAMBERTVILLE, THE COUNTY OF HUNTERDON AND JOHN DOES POLICE OFFICERS and/or OFFICIALS -10, AND THE STATE OF NEW JERSEY, carelessly:

- a) failed to conduct sufficient training or supervision with respect to the limitations on the use of excessive force;
- b) tolerating the use of excessive force;
- c) failed to uphold their duty due and owing to the public to protect and serve the public by carelessly and recklessly endangering the safety and well being of plaintiff.

15. As a direct and proximate cause of the negligence, the plaintiff, HEATHER WILLIAMSON-HUGHES, suffered severe mental anguish, capacity for the loss of enjoyment of life, injury to reputation, incurred medical costs and expenses, and household and maintenance expenses. These injuries are permanent in nature and plaintiff will continue to suffer such losses for the remainder of her life.

**WHEREFORE**, Plaintiff, HEATHER WILLIAMSON-HUGHES demand judgment against HUNTERDON COUNTY PROSECUTOR'S OFFICE-NARCOTIC TASK FORCE UNIT, LAMBERTVILLE CITY POLICE DEPARTMENT, TRENTON POLICE DEPARTMENT, THE CITY OF THE LAMBERTVILLE, THE COUNTY OF HUNTERDON AND JOHN DOES POLICE OFFICERS and/or OFFICIALS -10, AND THE STATE OF NEW JERSEY for compensatory and consequential damages, including damages for emotional distress, humiliation, loss of enjoyment of life, and other pain and suffering on all claims allowed by law in an amount to be determined at trial;

- a) economic losses on all claims allowed by law;
- b) special damages in an amount to be determined at trial;
- c) punitive damages on all claims allowed by law against individual Defendants and in an amount to be determined at trial;
- d) attorneys' fees and the costs associated with this action; and
- e) any further relief that this court deems just and proper.

**COUNT II**  
**EXCESSIVE FORCE AGAINST DEFENDANTS, SERGEANT GRAMLICH, OFFICER V. ALBANI, JOHN DOES POLICE OFFICERS and/or OFFICIALS 1-10**

16. Plaintiff, HEATHER WILLIAMSON-HUGHES, adopts and realleges the allegations contained in paragraphs 1 through 15 inclusive as if set forth fully herein.

17. Defendants, Sergeant Gramlich, Officer V. Albani and John Does Police Officers and/or Officials 1-10, caused severe psychological and emotional injuries when they maliciously and baselessly detained and attempted a false arrest of Plaintiff, HEATHER WILLIAMSON-HUGHES, utilizing excessive force resulting in severe emotional injuries to Plaintiff.

18. As a direct and proximate result of the defendants' willful use of excessive force, plaintiff suffered severe psychological and emotional injuries resulting in severe mental anguish, capacity for the loss of enjoyment of life, injury to reputation, and incurred medical costs and expenses. These injuries are permanent in nature and plaintiff will continue to suffer such physical and emotional losses from the remainder of her life.

**WHEREFORE**, Plaintiff, HEATHER WILLIAMSON-HUGHES demand judgment against defendants, Sergeant Gramlich, Officer V. Albani and John Does Police Officers and/or Officials 1-10, for compensatory and consequential damages, including damages for emotional distress, humiliation, loss of enjoyment of life, and other pain and suffering on all claims allowed by law in an amount to be determined at trial;

- a) economic losses on all claims allowed by law;
- b) special damages in an amount to be determined at trial;
- c) punitive damages on all claims allowed by law against individual Defendants and in an amount to be determined at trial;
- d) attorneys' fees and the costs associated with this action; and
- e) any further relief that this court deems just and proper

**JURY DEMAND**

Plaintiff hereby demands a trial by jury as to all issues as triable as a matter of right.

**DESIGNATION OF TRIAL COUNSEL**

**PLEASE TAKE NOTICE** that pursuant to Rule 4:25-4, Lawrence E. Popp, Esquire, is hereby designated as Trial Counsel in the within matter.

**CERTIFICATION**

It is hereby certified that the foregoing matter in controversy is not the subject of any other pending action in any Court or of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated. I further certify that there are no other parties of whom I am aware who should be joined in this action.

**GAYLORD POPP, L.L.C.**

Attorneys for Plaintiff

By: \_\_\_\_\_

LAWRENCE E. POPP

Dated: November 13, 2018