

LOUIS CHARLES SHAPIRO, P.A.
1063 East Landis Avenue
P.O. Box 787
Vineland, New Jersey 08362
(856) 691-6800
Attorney for Plaintiff, Paul Vidro

CUMBERLAND FINANCE
Batch # 693

JUN 16 2011

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PAUL VIDRO,
Plaintiff,
vs.
JULIO PUMAREJO; CITY OF
MILLVILLE; THOMAS HAAS;
and JOHN DOE(S) I, II, III, IV
and V,
Defendants.

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION
: CUMBERLAND COUNTY
: Docket No.: L564-11
: CIVIL ACTION
: 609 DEFAMATION
: COMPLAINT

SUPERIOR COURT OF N.J.
CUMBERLAND COUNTY
LAW DIVISION

JUN 16 2011

REC'D & FILED
CIVIL CASE
MANAGEMENT OFFICE

AUG - 3 2011

Plaintiff, Paul Vidro, residing at 501 Brandy Ridge Road, Millville, Cumberland County, New Jersey, by way of Complaint against the Defendants, Julio Pumarejo, the City of Millville, Thomas Haas, and John Doe(s) I, II, III, IV and V, alleges as follows:

I. Introduction

1. This action arises out of the initial private misconduct of City of Millville Police Officer Julio Pumarejo committed against the Plaintiff while Pumarejo was not acting under color of law.
2. His misconduct, however, escalated to such a point and to such a degree that it involved the patent misuse of his authority as a law enforcement officer.
3. What began as a casual acquaintance between Plaintiff and Defendant Pumarejo evolved into disputes about their respective properties; defamatory statements of adultery leveled against Plaintiff; the cover-up of an auto accident; and culminating with the filing of a false traffic violation against Plaintiff, the dismissal of such charge, and a finding against Pumarejo by the Millville Police

Department's Internal Affairs unit.

4. Such misconduct has left Plaintiff uneasy and fearful on a daily basis, given his family's proximity to Officer Pumarejo. Pumarejo's malicious course of conduct has left Plaintiff and his family doing everything possible to avoid giving Pumarejo any opportunity to continue his harassment.

5. Pumarejo's actions - - as a private citizen and as a police officer - - have resulted in damage to Plaintiff's reputation, his business, his marital relationship and caused Plaintiff to endure the indignity of being falsely hailed into court.

II. The Parties

6. Plaintiff Paul Vidro ("Plaintiff") is an adult individual residing at 501 Brandy Ridge Road, in the City of Millville, Cumberland County, New Jersey 08332.

7. At all times pertinent hereto, Plaintiff was a citizen of the United States and a resident of the State of New Jersey.

8. Defendant Julio Pumarejo ("Pumarejo") is an adult individual, also residing on Brandy Ridge Road in the City of Millville, Cumberland County, New Jersey 08332.

9. This action is brought against Pumarejo in his individual capacity for actions taken when not acting under color of state law and against Pumarejo for actions taken in his official capacity while acting as a police officer and under color of law, as more fully specified herein.

10. In connection with Pumarejo's official actions, Plaintiff alleges that Pumarejo was a duly appointed and employed policeman and officer of the City of Millville, acting under color of law.

11. Defendant Thomas Haas ("Haas") was at all times pertinent hereto, and upon information and belief at least as of September of 2010, a duly appointed and employed law enforcement officer

of the City of Millville, as either acting or permanent Chief of Police of the City of Millville Police Department, acting under color of law.

12. At all times relevant herein, Defendant City of Millville (hereinafter "Millville") was and is a municipal corporation within the State of New Jersey and at all times relevant herein employed Defendants Pumarejo, Haas and those defendants identified hereinbelow and collectively referred to as John Doe(s).

13. Upon information and belief, there exist additional employees of the Millville Police Department, other law enforcement entities and/or persons and/or others whose true names are unknown to Plaintiff, who participated in and were responsible and liable for the actions and/or omissions made and taken against Plaintiff, as described in this Complaint, which proximately caused the injuries and damages suffered by Plaintiff. Said unnamed and unknown individuals acted under color of law and are referred to as John Doe(s) I.

14. Upon information and belief, there exist additional employees of the City of Millville Police Department, other law enforcement entities and/or persons and/or others whose true names are unknown to Plaintiff, who are responsible and liable as officer(s) in charge of and/or supervisors of Pumarejo and John Doe(s) I with respect to the actions and/or omissions made and taken against Plaintiff, as described in this Complaint, which proximately caused the injuries and damages suffered by Plaintiff. Said unnamed and unknown individuals acted under color of law and are referred to as John Doe(s) II.

15. Upon information and belief, there exist additional employees of the Millville Police Department, other law enforcement entities and/or persons and/or others whose true names are unknown to Plaintiff, who are responsible and liable as supervisors for tolerating past or ongoing

abuses of power by its police officers, including but not limited to the false placement of traffic charges against innocent citizens and the settling of personal grudges through the use of false charges levied against citizens, including the events complained of herein, which proximately caused the injuries and damages suffered by Plaintiff. Said unnamed and unknown individuals acted under color of law and are referred to as John Doe(s) III.

16. Upon information and belief, there exist additional employees of the Millville Police Department, other law enforcement entities and/or persons and/or others whose true names are unknown to Plaintiff, who are policymakers responsible and liable for unconstitutional policies and/or customs of the City of Millville, including but not limited to the matters described in this Complaint, which proximately caused the injuries and damages suffered by Plaintiff. Said unnamed and unknown individuals acted under color of law and are referred to as John Doe(s) IV.

17. Upon information and belief, there may exist individuals other than Haas who, at times pertinent hereto, were duly appointed and employed law enforcement officer(s) of the City of Millville and Chief or Acting Chief of Police of the Millville Police Department, acting under color of law. Said unnamed and unknown individual(s) are referred to as John Doe(s) V.

18. John Doe(s) I, John Doe(s) II, John Doe(s) III, John Doe(s) IV and John Doe(s) V may elsewhere be described in this Complaint as John Doe(s).

19. Plaintiff reserves the right to amend this pleading to add additional parties and additional causes of action as may be permitted under the New Jersey Tort Claims Act and/or by court order.

III. Factual Allegations

20. Several years ago Plaintiff and Defendant Pumarejo, who live on the same street in the City of Millville, were on friendly terms, such that the two would have casual conversations when

they came into contact with each other.

21. More recently, Plaintiff sensed a change in Pumarejo's behavior toward Plaintiff and a mutual friend in their neighborhood. Defendant was upset about the City of Millville issuing him a warning of a city ordinance violation because Pumarejo allegedly had junk unregistered vehicles parked on the street in front of his house and on his side lawn. Pumarejo became aware that someone had called in a complaint which prompted the issuance of the warning.

22. Pumarejo was very agitated at the fact that someone reported him to city officials and said to Plaintiff that if he found who it was he was going to make that person's life "miserable," or words to this effect. Pumarejo then asked how Plaintiff would like it if someone reported Plaintiff having his boat parked in front of Plaintiff's house, and Plaintiff responded by telling Pumarejo that both his boat and trailer were registered. That response agitated Pumarejo, and Plaintiff quickly ended the conversation. Pumarejo seemed to believe that it was one of his neighbors who reported him to the city.

23. Plaintiff later found out that it was actually a realtor who was representing one of the homes for sale on the parties' block who phoned in the complaint against Pumarejo.

24. The parties' relationship worsened, however, when Pumarejo called Plaintiff, asking if Plaintiff was at his business and if he could stop in and speak to Plaintiff.

25. Pumarejo met Plaintiff at his glass studio in Millville, at which point Pumarejo explained to Plaintiff that he had recently been put on disability from a back injury he received while on deployment with the United States Air Force and was facing financial difficulties because of his inability to return to work with the Millville Police Department.

26. Pumarejo then asked Plaintiff if Plaintiff could provide Pumarejo some side work at

Plaintiff's studio. Plaintiff responded by expressing his belief that Pumarejo could not work while on disability.

27. Pumarejo suggested that his work at Plaintiff's glass studio be "under the table," or "off the books," or words to this effect. Plaintiff responded that the way his business was structured would make it impossible for him not to account for any income provided to Pumarejo. As such, Plaintiff told Pumarejo that the arrangement suggested by Pumarejo was illegal and that both of them could face serious consequences. Pumarejo countered by stating that he did not need a lot of work hours. Again, Plaintiff refused, at which point Pumarejo became short with Plaintiff and left.

28. Thereafter, Pumarejo's attitude became non-sociable toward Plaintiff.

29. On another occasion, Plaintiff noticed Pumarejo in what looked like a disagreement with his neighbor across the street, Terrance Moore, also on Brandy Ridge Road. The next day, Plaintiff learned from Moore that Moore also was having problems with Pumarejo - - specifically, that Pumarejo thought it was Moore that called the city about Pumarejo's vehicles. Moore seemed very upset and told Plaintiff that Pumarejo and his wife had been causing Moore and Moore's wife a lot of grief.

30. In addition, in July or August of 2010, Plaintiff had a brief visit to the Moore house to speak to Moore and his wife about a thermal pool cover they had purchased. Pumarejo and his wife at that time had a strange interest as to why Plaintiff was at the Moore residence.

31. On that occasion, and no more than fifteen minutes later, Plaintiff's wife came in from outside the house and approached Plaintiff grief stricken and very angry. Pumarejo's wife had just told Plaintiff's wife that Plaintiff had been having a sexual affair with Moore's wife. Plaintiff then had a heated argument with his wife, which Plaintiff settled by telling her they were going to find

out what was going on.

32. Plaintiff walked down the block, and as Plaintiff approached Pumarejo's home, Plaintiff saw Terrance Moore in his driveway and called him over. Plaintiff told Moore what Mrs. Pumarejo had just told Plaintiff's wife.

33. Plaintiff was shocked to find out from Moore on that day in July or August 2010 that, during an argument Moore had with Pumarejo, Pumarejo told Moore that Plaintiff was having a sexual affair with Moore's wife. Moore then told Plaintiff that Moore and his wife were having marital difficulties because of Pumarejo's accusations, in addition to the fact that Pumarejo constantly annoyed them with loud music and ran his motorcycle out front and at odd hours knowing that the Moores had young children. At one point, Moore apparently had called the police to complain, after which Pumarejo's response was to play his music even louder.

34. On Sunday, November 21, 2010, at approximately 3:40 P.M., Plaintiff left his house in his family's SUV with his wife and two daughters, aged ten and four. Plaintiff and his family were on their way to their youngest daughter's birthday party, which was to take place in Pleasantville, New Jersey approximately forty minutes away.

35. Plaintiff's wife was sitting in the front seat holding a large and delicate birthday cake adorned with decorations, including a castle. So that the delicate birthday cake was not damaged by bumps or sharp turns, Plaintiff's wife had to hold onto it to keep it secure.

36. Plaintiff and his family did not experience anything out of the ordinary during this trip to Pleasantville, and they arrived at their destination on time as planned.

37. Approximately one week later, however, Plaintiff received ticket #180160 in the mail, charging Plaintiff with a traffic violation, reckless driving, a charge which required his appearance

in Millville Municipal Court. Plaintiff was completely confused, and felt there had to be some of mistake, until Plaintiff saw the name of the complaining witness listed on the ticket: Julio Pumarejo.

38. The circumstances of how Plaintiff and his family left their home on November 21, 2010 could not have given rise to a reckless driving ticket. For that to have happened, Plaintiff would have had to pull out of his driveway in reverse and come to a complete stop, then shift his SUV to drive and somehow in such a short distance between Pumarejo's and Plaintiff's houses gone from zero miles per hour to "reckless" with Plaintiff's entire family in the vehicle and Plaintiff's wife holding a delicate birthday cake in her lap to protect it from any motion damage. In that short distance, Plaintiff would have had to push the gas pedal to the floor of the vehicle to even come close to speeding (which could not have occurred), let alone to commit reckless driving. Plaintiff also noticed that Pumarejo changed the address on the ticket from "510 Brandy Ridge Road," which does not exist, to his own address. For Pumarejo to not know a neighboring house number on his own street demonstrates the fabricated nature of the traffic ticket issued to Plaintiff.

39. When Plaintiff received the reckless driving ticket in the mail, Plaintiff advised Moore, his neighbor, of the situation. At that time, Moore related to Plaintiff a prior incident in which Pumarejo's oldest son had a vehicular accident while driving in the neighborhood. Pumarejo's son apparently hit a parked vehicle and damaged a street lamp. The parked vehicle that was hit belonged to a Mr. Quakenbush, Pumarejo's next-door neighbor. Moore and Quakenbush overheard Pumarejo, who was off duty at the time, ask the responding Millville officers to move their squad car, and stated that he did not want the scene captured on video. The responding officers complied.

40. Upon information and belief, the report filed by the Millville Police made no mention of Pumarejo's son receiving any tickets, complaints, summonses and/or any violations as a result of this

accident. As a result of this incident, a vehicle was hit, and a street lamp pole was damaged and had to be replaced. Also upon information and belief, while Quakenbush's car and the street light were damaged, Quakenbush apparently was the only person to receive a ticket allegedly for having his car parked on the street facing the wrong way.

41. This series of incidents demonstrate Pumarejo's failure to follow the laws he was sworn to uphold, and to demonstrate the manner in which Pumarejo would misuse the laws in his position as a Millville Police officer.

42. Plaintiff filed a complaint with the Millville Police Department's Internal Affairs unit. In mid-April of 2011, Plaintiff received a letter from an internal affairs officer dated two months earlier, February 21, 2011, and coincidentally dated precisely ninety (90) days from the date of the false traffic ticket, which stated in pertinent part:

The Internal Affairs Unit of this department has completed its investigation of your report concerning the conduct of Officer Julio Pumarejo[.] The investigation and review of all information currently available to this office is that the officer violated departmental rules and regulation [sic]. Officer Pumarejo will be subject to the appropriate discipline under our agency's procedures (bracketed material added).

43. As is clearly apparent, Pumarejo's actions resulted in an adverse internal affairs finding from his own police department. The level and severity of the discipline leveled against Pumarejo is unknown to Plaintiff.

44. On or about May 4, 2011, and/or possibly on other dates, Plaintiff was required to appear in Millville Municipal Court to answer for the reckless driving charge described herein. At that time, the prosecution terminated in Plaintiff's favor, as the charge was dismissed.

IV. Causes of Action

FIRST COUNT

Defamation

45. Plaintiff incorporates paragraphs 1 through 44 as if set forth at length herein.

46. In or about July and/or August of 2010, Plaintiff learned for the first time that Defendant Julio Pumarejo was the source of an accusation told to others that Plaintiff was carrying on an extra-marital affair with a neighbor's wife.

47. Such communication had no nexus to, nor was it in furtherance of, any pending litigation, such that it was privileged.

48. Defendant Pumarejo's statement about Plaintiff was knowing and intentional, and also false.

49. Such communication, made in the course of Pumarejo's actions as a private citizen and not while acting under color of law, was injurious to Plaintiff's reputation and/or exposed Plaintiff to hatred, contempt or ridicule and/or subjected Plaintiff to a loss of goodwill and confidence in which he is held by others. It further caused pain in Plaintiff's marriage.

50. In addition, and/or alternatively, such defamation did not relate to a matter of public concern and constituted slander per se, in that Defendant Pumarejo's statements imputed serious sexual misconduct, such as adultery, to the Plaintiff.

WHEREFORE, Plaintiff Paul Vidro respectfully requests that this Honorable Court enter judgment in his favor and against Defendant Julio Pumarejo, award him compensatory damages and punitive damages in an amount sufficient to punish Defendant for his intentional and outrageous behavior, award him prejudgment interest, and grant Plaintiff such other relief as the Court deems

just.

SECOND COUNT

Intentional Infliction of Emotional Distress

51. Plaintiff incorporates paragraphs 1 through 50 as if set forth herein.

52. Defendant Pumarejo's conduct, as alleged herein, committed in his individual capacity, was extreme and outrageous, such that it exceeded all possible bounds of decency.

53. Such conduct was atrocious and utterly intolerable in a civilized society.

54. Pumarejo's conduct was intentional and/or reckless.

55. Pumarejo's conduct caused Plaintiff severe emotional distress.

WHEREFORE, Plaintiff Paul Vidro respectfully requests that this Honorable Court enter judgment in his favor and against Defendant Julio Pumarejo, award him compensatory damages, and punitive damages in an amount sufficient to punish Defendant for his intentional and outrageous behavior, award him prejudgment interest and grant Plaintiff such other relief as the Court deems just.

THIRD COUNT

42 U.S.C. §1983

56. Plaintiff incorporates paragraphs 1 through 55 as if set forth at length herein.

57. This cause of action is brought pursuant to 42 U.S.C. §1983 and in accordance with the Fourth, Fifth and Fourteenth Amendments of the Constitution of the United States of America, and in accordance with Article I, paragraph 1 of the Constitution of the State of New Jersey.

58. Defendants Pumarejo and John Doe(s) I and II caused to be issued against Plaintiff the aforementioned traffic ticket charging Plaintiff with reckless driving on November 21, 2010 without

probable cause that Plaintiff committed said offense.

59. The Defendant City of Millville and its policymakers, including Haas, John Doe(s) III, IV and V, upon information and belief, had a policy or custom of failing to adequately train its officers and employees with respect to preventing the issuance of false charges, and/or preventing the settling of private grudges thereby, against fellow citizens, and said Defendants were deliberately indifferent to the deficiency in training in the above regard and to the rights of persons with whom the police came in contact, which deficiency in training proximately caused the injuries and damages complained of herein by Plaintiff.

60. The Defendant City of Millville, and its policymakers, including Haas, John Doe(s) III, IV and V, upon information and belief, had a policy and/or custom that tolerated the issuance of false charges, and/or of using police power to settle private grudges against fellow citizens, which proximately caused the constitutional injuries complained of herein by Plaintiff.

61. The City of Millville's training program(s) as described hereinabove were inadequate, including but not limited to the failure to train its officers with respect to the issuance of false charges, and the need for probable cause to support charges, and the City of Millville was deliberately indifferent to the deficiency, and the deficiency in training actually caused the actions of the individual Defendants set forth herein, which proximately caused the injuries and damages complained of herein by Plaintiff.

62. The City of Millville, Haas, John Doe(s) II, III, IV and V negligently supervised Pumarejo and John Doe(s) I who were involved in the unconstitutional issuance of a false traffic charge against Plaintiff without probable cause.

63. Defendants City of Millville, Haas and John Doe(s) II, III, IV and V knew and/or were

aware of and/or should have known of the alternatives for preventing the constitutional violations complained of herein and/or acquiesced in a policy or custom of inaction or tolerance in the above regard.

64. Defendants Pumarejo and John Doe(s) I and II issued and/or approved or acquiesced in the issuance of a blatantly false traffic ticket against Plaintiff without probable cause.

65. Defendants Pumarejo and John Doe(s) I and II did not act in an objectively reasonable manner in taking the actions or inactions against Plaintiff, as complained of herein.

66. Defendants Pumarejo and John Doe(s) I and II could not reasonably have believed that Plaintiff committed the traffic violation as described hereinabove.

67. Plaintiff was charged and subjected to court process, all without probable cause.

68. Defendants Pumarejo, Haas, and John Doe(s) I, II, III, IV and V directly and proximately caused Plaintiff to be subjected to court process without probable cause, thereby violating Plaintiff's rights under the Fourth, Fifth and Fourteenth Amendments of the United States Constitution and Plaintiff's rights under Article I, paragraph 1 of the Constitution of the State of New Jersey.

69. Defendants Pumarejo, Haas and John Doe(s) I, II, III, IV and V jointly, severally and in the alternative, deprived Plaintiff of federal and state and constitutional rights, as set forth herein, and deprived Plaintiff of said rights acting under color of state law, in violation of 42 U.S.C. §1983.

70. As set forth herein, Defendants Pumarejo and/or John Doe(s) I instituted court process against Plaintiff.

71. As described above, said court process terminated in Plaintiff's favor.

72. The court process issued against Plaintiff was initiated with malice and/or without the primary purpose of bringing an alleged offender to justice.

73. Plaintiff has a clearly established right under federal law to be free from malicious prosecution, which liberty interest is cognizable under 42 U.S.C. §1983.

74. As a direct and proximate cause of the actions and omissions of Defendants, Plaintiff suffered great and substantial emotional upset, mental pain and suffering, grief and anguish, as well as other damages and injuries set forth in this Complaint.

WHEREFORE, Plaintiff Paul Vidro respectfully requests that this Honorable Court enter judgment against Defendants City of Millville, Julio Pumarejo, Thomas Haas, John Doe(s) I, John Doe(s) II, John Doe(s) III, John Doe(s) IV and John Doe(s) V, individually, jointly, severally, for such sums as would reasonably and properly compensate Plaintiff in accordance with the law, together with punitive damages to the extent applicable and allowed, prejudgment interest, costs of suit, and reasonable attorney's fees pursuant to 42 U.S.C. §1988.

FOURTH COUNT

Violation of Article I, ¶1 of the New Jersey Constitution

75. Plaintiff incorporates paragraphs 1 through 74 as if set forth at length herein.

76. As a result of the conduct alleged against Defendants in connection with the issuance of a false traffic charge against Plaintiff, Plaintiff has been deprived of due process of law guaranteed under Article I, ¶1 of the New Jersey Constitution.

77. In addition to and/or in the alternative, Plaintiff has a constitutionally protected interest in maintaining his good name or reputation from unlawful actions by government actors, as described herein.

WHEREFORE, Plaintiff Paul Vidro respectfully requests that this Honorable Court enter judgment against Defendants City of Millville, Julio Pumarejo, Thomas Haas, John Doe(s) I, John

Doe(s) II, John Doe(s) III, John Doe(s) IV and John Doe(s) V, individually, jointly, severally, for such sums as would reasonably and properly compensate Plaintiff in accordance with the law, together with punitive damages to the extent applicable and allowed, prejudgment interest, and grant him such other relief as the Court deems just.

FIFTH COUNT

Injunctive Relief

78. Plaintiff incorporates paragraphs 1 through 77 as if set forth at length herein.

79. Based on Defendants' actions outlined above, Plaintiff is entitled to injunctive relief to abate the misconduct perpetrated by Defendants against the Plaintiff.

80. The character of Plaintiff's interest to be protected is the solemn interest Plaintiff has in, among other interests that may be revealed in discovery, being free of constitutional infringement, malicious prosecution and unwarranted harassment by members and officials of the Millville Police Department.

81. The entry of an injunction would be an appropriate remedy, as Plaintiff has no adequate remedy at law to guard against future unwarranted actions by the Defendants.

82. Plaintiff has not unreasonably delayed in bringing suit. Furthermore, as described herein, the conduct complained of could continue, and retaliation could occur, unless the court intervenes to abate Defendants' unlawful conduct.

83. The hardship Plaintiff would endure if relief were denied would far outweigh any hardship to Defendants if injunctive relief were granted. Indeed, if relief were denied, Defendants would be more emboldened to further violate Plaintiff's rights and to continue their disturbing activities, as they have previously done.

84. Entering equitable relief would be in the interest of the public and/or other residents in the Plaintiff's neighborhood.

85. The conduct of Defendants, as described above, outweighs any misconduct Defendants could allege against Plaintiff.

86. It would be practical to frame an order for an injunction to fit the circumstances of this dispute.

WHEREFORE, Plaintiff Paul Vidro respectfully requests that this Honorable Court enter judgment in his favor and against Defendants Julio Pumarejo, the City of Millville, Thomas Haas, John Doe(s) I, II, III, IV and V, enter preliminary and/or permanent injunctive relief abating the conduct described herein, and grant him such other relief as the Court deems just.

JURY DEMAND

DEMAND IS HEREBY MADE FOR A TRIAL BY JURY ON ALL ISSUES.

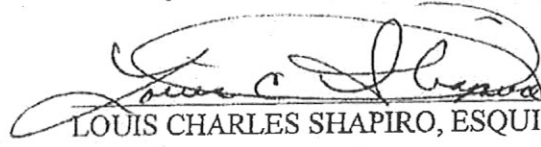
DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Louis Charles Shapiro, Esquire is hereby designated as trial counsel in the above captioned litigation on behalf of the Plaintiff Paul Vidro.

NOTICE PURSUANT TO RULES 1:5-1(a) and 4:17-(c)

TAKE NOTICE that the undersigned attorney, counsel for Plaintiff Paul Vidro, does hereby demand pursuant to Rules 1:5-1(a) and 4:17-4(c) that each party herein serving pleadings and interrogatories and receiving answers thereto serve copies of all such pleadings and interrogatories upon the undersigned attorney and TAKE NOTICE that this is a continuing demand.

LOUIS CHARLES SHAPIRO, P.A.
Attorney for Plaintiff, Paul Vidro



LOUIS CHARLES SHAPIRO, ESQUIRE

DATED: June 15, 2011

CERTIFICATION

I, Louis Charles Shapiro, Esquire of full age, do hereby certify as follows:

1. I am an attorney-at-law of the State of New Jersey, and I am responsible for the preparation and trial of the within matter.

2. This matter is not related to any other matters, nor has any action been brought in any court, relative to the within complaint.

I hereby 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.


LOUIS CHARLES SHAPIRO, ESQUIRE

DATED: June 15, 2011