

FACTUAL BASIS COMMON TO ALL CLAIMS

12. On June 23, 2012 Mr. Severino was out with his daughters and their mother (Ms. Souders) at the St. Stain's carnival which after wards we dropped the kids off and went to WaWa. At WaWa when exiting the store Officer Popowski was parked behind us (in a parking space.) where he watched Ms. Souders get into the driver seat and Mr. Severino into the passenger side of my Jeep.
13. Officer Popowski then followed us less than a ½ mile to just where we were about to pull into the apartment parking lot he put his lights on and pulled us over. We pulled into the lot and stopped. When Officer Popowski came to the window I asked him what his probable cause for pulling us over and he stated "because the registered owner's driver license is suspended" I then told the officer he had no probable cause he just watched us get into the truck at wawa and knew that I wasn't driving. And that the driver was female. Officer Popowski said nothing and left while another 2 police cars pulled up with officer Mader and Officer Teator and few minutes later Sgt. Connors came on the scene
14. For over 20 minutes we sat in the jeep before Officer Mader came over and stated "the vehicle was stopped because the head light was out" I said well to bad Officer Popowski already stated he stopped us because my license was suspended. Then he asked me for ID which I told him "you have my reg. and insurance card".
15. After an hour sitting there Officer Popowski then came over and told Ms. Souders to pull around into the parking space of the apartment where Officer Teator then told her to turn the truck off and take the keys out they then told me to step out the truck and come to the back.
16. Which I did and Officer Popowski then told me I was under arrest. I was about to ask for what and before I was able to finish the sentence Officer Popowski grabbed me by the neck and slammed my head into the back of the jeep and yelled your resisting arrest I was then punched in the stomach and ribs by Officer Mader knocking the wind out of me and I fall to the ground and was unable to breath then Officer Teator kicked and stomped on my back several times while Officer Mader then grabbed and slammed my head into the ground while Officer Popowski pulled my arms behind my back and cuff them. I was then lifted by my arms were I was slammed onto the hood of the squad car and held by my neck pushing my face into the hood while being searched and then thrown into the back seat of the squad car where Sgt. Connors stated "Sev one day you'll learn your place", during the assault he stood with his gun pointed at me. Further the defendants made vulgar remarks regarding plaintiff and comments about filing complaints against them though out the incident. Even further the assault was done in front of plaintiff's 4 year old daughter.
17. While detained at the Sayreville Police Station and handcuffed to a bench, Plaintiff requested a phone call and medical attention which plaintiff was denied I then told Officer Popowski that I wanted my family to be given my truck keys to move it to a safe place. Which he refused to do I then requested to speak with the Station commander, which also was denied.
18. On August 3, 2012 The Middlesex County Prosecutor's office dismissed the charges because there was no probable cause and Mr. Severino was released from the Middlesex County Jail after doing 42 days.

19. Mr. Severino then went back to Ms. Souders apartment where he found that all his property was removed from his truck and Ms. Souders had placed it in her apartment [allegedly for safe keeping].
20. On approx. August 5, 2012 Mr. Severino filed a complaint with Chief Zebrowski for the assault by the officers and expressed his desire to file criminal charges against said officers.
21. As a result of this incident, Mr. Severino sustained serious and permanent physical injuries as well as psychological and emotional trauma, fear, humiliation, and loss of property. He has suffered permanent damages due to the retaliatory acts and unlawful conduct of the defendants herein mentioned.

COMPLAINT

COUNT ONE -General Allegation

22. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint.
23. In committing the acts complained of herein, Defendants acted under the color of the law to deprive Plaintiff of certain constitutionally protected rights but not limited to: (a) Failure to Implement Appropriate Policies, Customs and Practices, (b) False Arrest; (c) Assault and Battery/excessive force (d) false imprisonment; (e) malicious prosecution; (f) Intentional Infliction of Emotional Distress; (g) Negligence; (h) Negligent Supervision; (i) Negligent Hiring and Retention (j) Civil Conspiracy.
24. In violating Plaintiff's rights as set forth above and other rights to be proven at trial, Defendants Sayreville Police Officers acted under the color of the law and conducted an unlawful detainment and deprivation of liberty without due process in violation of Plaintiff's Constitutional and common law rights under the First, Fourth, Fifth, Eighth and Fourteenth Amendments of the United States Constitution.
25. Defendants' acts were willful, wanton, malicious, oppressive and done with conscious disregard and deliberate indifference for Plaintiff's rights. Defendants' policies, practices, conduct and acts alleged herein have resulted and will continue to result in irreparable injury to the Plaintiff.

COUNT TWO -Failure to Implement Appropriate Policies, Customs, and Practices

26. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint.
27. On the stated date and time, All defendants did violate Mr. Severino's Constitutional rights and did so pursuant and custom to a de-facto pattern and practice of the defendant's deliberate indifference to the Constitutional rights of Plaintiff. Def. Borough of Sayreville and Sayreville Police Dept. implicitly and explicitly adopted and implemented careless and reckless policies, customs, or practices that included among other things displaying a pattern and practice of retaliatory acts, confronting and using excessive force against non-violent citizens' without any reasonable training and in such a way as to cause injuries to citizens' without lawful justification

and write false and misleading police reports and filing false charges against the plaintiff and failing to have disciplinary procedures.

28. The failure of Borough of Sayreville and Sayreville Police Dept to adequately train and supervise Chief Zebrowski, Sgt. K Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator amounts to deliberate indifference to the civil rights of Mr. Severino

COUNT THREE - False Arrest

29. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint

30. Def. Sgt. K Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator acted under the color of the law by falsely arresting and detaining Plaintiff with no basis in fact or law to do so. The Defendants denied Mr. Severino his rights, privileges, and/or immunities secured by the United States Constitution depriving him of his liberty without due process of law, by taking him into custody and holding him against his will.

COUNT FOUR - False Detention and Confinement

31. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint

32. Def. Ptl. Popowski and John Dow breached a duty of care owed to Plaintiff so as not to deprive him of his personal liberty by intentionally, wrongfully and unlawfully detaining and confining, him without probable cause and without a warrant from the Court.

33. Mr. Severino alleges that such acts directed towards him were malicious and belligerent and the acts were done with a conscious disregard for his right to be free from such tortuous behavior such as to constitute oppression and malice behavior.

34. On July 23, 2012 the plaintiff was taken from the township of Sayreville where he resides to the Middlesex County Jail against his will and in the custody of Ptl. Popowski and John Dow. And was confined for 42 days before being released.

COUNT FIVE - Malicious Prosecution

35. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint

36. The actions of Def. Sgt. Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator as described in this Complaint constitute a deprivation of Mr. Severino's constitutional rights to be free from malicious prosecution, malicious abuse of process, and unlawful seizure and incarceration.

37. The defendants arrested Mr. Severino without probable cause and commenced prosecution with malice and for a personal vendetta of Ptl. Popowski and Sgt. Connors. The defendants caused there to be prosecution of Mr. Severino for contempt of court. Were Mr. Severino was required to retain an attorney and appear in court numerous times.

38. On August 3, 2012 the charges were dismissed for lack of probable cause and final in his favor.

COUNT SIX - Assault and Battery /Excessive and Unreasonable Use of Force

39. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint
40. On the stated date and place, Def. Sgt. Connors, Ptl. Popowski, Ptl. Mader and Ptl. Teator, knowingly, intentionally, and violently assaulted Mr. Severino by using excessive and unreasonable force by slamming his head into the truck and putting pressure on his neck preventing him from breathing, punching him in the stomach and ribs, throwing him onto the ground, kicking and stomping on his back, slamming his head on the ground and lifting his arms over his shoulder (while cuffed) and turning it in a manner not meant to be bent causing Mr. Severino to experience severe pain and agony. Then shoved into the back seat of a patrol car and left handcuffed and on his back for more than 15 minutes, in fear of his life.
41. During the assault defendants yelled threats and profanities aimed at Mr. Severino for excusing his constitutional rights in exposing the corruption of the police department and government body in complaints to State and Federal authorities.
42. Mr. Severino is informed and believes that he has suffered a permanent disability. He was required to obtain medical services for the physical including bodily injury, psychological and emotional distress. As a result of defendant's conduct Mr. Severino has been, and continues to be, unable to work since the events described in this complaint. Defendant's acts were done knowingly, willfully, and with malicious intent.

COUNT SEVEN - Conspiracy

43. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint
44. Under Title 18, U.S.C., Section 241 it is unlawful for two or more persons to conspire to injure, oppress, threaten, or intimidate any person of any state, territory or district in the free exercise or enjoyment of any right or privilege secured to him/her by the Constitution or the laws of the United States, (or because of his/her having exercised the same).
45. Since the assault, the Def. Borough of Sayreville, Chief Zebrowski, Sgt. Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator and others engaged in a course of conduct designed to delay, obstruct and impair the investigation into the assault on Mr. Severino beginning with the decision to unlawfully arrest him without reason or cause, file false reports and attempt to change the reason of probable cause and engage in a malicious prosecution of Mr. Severino
46. The defendants stand to gain by terrorizing, torturing, and preventing Mr. Severino from focusing on filing criminal and civil complaints against them for their violations of federal and state laws. The defendants did conspire with one another to cover-up the assault/excessive use of force. In furtherance of the plan to cover-up the incident the Defendants initiated a malicious prosecution against him.

COUNT EIGHT - Negligence

47. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint

48. On said date, Def. Chief Zebrowski, Sgt. Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator were negligent in their performance and/or failure to perform duties undertaken in the course of their employment, including but not limited to failure to use due care at or about the times of the aforementioned incident.
49. In committing the aforementioned acts and/or omissions, each Defendant negligently breached said duty to use due care.

COUNT NINE - Negligent Supervision

50. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint
51. On said date, Def. Borough of Sayreville, Sayreville Police Dept., and Chief Zebrowski through its agents, servants and/or employees were negligent and otherwise reckless in that they failed to adequately train, supervise and properly control the Def. Sgt. K Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator and did negligently hire or continued to employ the Defendants creating an atmosphere of lawlessness within which officers perpetuated a violation of civil rights.
52. Def. Borough of Sayreville, Sayreville Police Dept., and Chief Zebrowski, failed to properly instruct and supervise their subordinate police officers and prevent the negligent acts of their subordinates when, they knew or reasonably should have known of such acts and had the authority and responsibility to prevent these acts.
53. Acting under the color of the law, Def. Borough of Sayreville, Sayreville Police dept. and Chief Zebrowski, negligently failed to instruct, supervise control, and discipline on a continuing basis the Defendants as to their duty to refrain from: (a) unlawfully and maliciously harassing a citizen by displaying a pattern, practice and policy of discrimination and/or deliberate indifference to the civil rights of its citizens (b) unlawfully and maliciously arresting, detaining and confining a citizen in retaliation for filing complaints/lawsuits against fellow officers (c) and otherwise depriving Plaintiff of his constitutional and statutory rights, privileges, and immunities.
54. Def. Borough of Sayreville, Sayreville Police dept. and Chief Zebrowski directly and indirectly under the color of the law, approved or ratified the unlawful 'deliberate, reckless, and wanton conduct of the Defendants.

COUNT TEN - Negligent Hiring

55. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint
56. Def. Borough of Sayreville, Sayreville Police Dept. selected, hired, and retained defendants to perform work under the color of the law.
57. Def. Borough of Sayreville, Sayreville Police Dept. failed to exercise reasonable care and were negligent in selecting, hiring and retaining Def. Chief Zebrowski, Sgt. Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator to perform work. At the time, Def. Borough of Sayreville/Sayreville Police Dept selected, hired or retained Defendants, and at all other relevant times,

58. Def. Borough of Sayreville/Sayreville Police Dept. knew or reasonably should have known that Defendants would violate Plaintiff civil and constitutional rights a) Sgt. Connors who assaulted plaintiff three other times and tampered with evidence and who settled a prior lawsuit for assault b) Chief Zebrowski who tampered with evidence and was named in a past lawsuit for misconduct and Plaintiff would suffer damages alleged herein. Def. Borough of Sayreville and Sayreville Police Dept. conduct constitutes negligence and is actionable under the laws of the United States and New Jersey.

COUNT ELEVEN - Respondent Superior

59. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint

60. Def. Chief Zebrowski, Sgt. Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator were at all times herein acting within the scope of their employment, as employees of the Borough of Sayreville and Sayreville Police Department. While acting within their employment Defendants were negligent in their performance and/or failure to perform their duties.

61. Under Respondent Superior, the Defendants Borough of Sayreville and Sayreville Police Department are liable for the acts of, and injury caused by said officers.

62. Sgt. Connors while supervising the defendants had a duty to protect Mr. Severino from the assault which he stood and watch and did nothing to stop it.

COUNT TWELVE - Violation of Civil Rights under N.J.S.A. 10:6-1

63. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint

64. On or about said dates Def. Borough of Sayreville and Sayreville Police Dept. through its agents servants and/or employees violated the civil rights of Mr. Severino under the New Jersey Civil Rights Act, N.J.S.A. 10:6-1 et seq. by using excessive force against him, falsely imprisoning him, and failing to provide needed medical treatment. Def. Chief Zebrowski Sgt. Connors, Ptl. Popowski, Ptl. Mader and Ptl. Teator for creating an atmosphere of lawlessness within which officers perpetuated a violation of civil rights based upon unlawful arrest, detention and confinement, discrimination/prejudice, deprivation of liberty, and others against the Plaintiff.

65. Plaintiff was detained, unlawfully arrested, and physically assaulted by members of the Sayreville Police Department inflicting physical injuries, psychological trauma, fear, and humiliation, all of which were done in the belief that such acts were justified by the Defendants' authority as police officers of the City Sayreville and otherwise under the color of the law.

66. Plaintiff alleges that such acts directed towards him were negligent and/or malicious and the acts were done in violation of Plaintiff's civil rights under the New Jersey Civil Rights Act, N.J.S.A. 10: 6-1 et. seq.

COUNT THIRTEEN - Intentional Infliction of Emotional Distress

67. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint

68. Defendants intentionally and deliberately inflicted emotional distress on Mr. Severino by outrageous and extreme display pattern, practice, and discrimination and deliberate indifference and by abusing the lawful process by unlawful purposes by violating his constitutional rights. Defendants' conduct was extreme and outrageous, beyond all possible bounds of decency.
69. At the time of the incidents alleged herein and before, Mr. Severino was emotionally and physically healthy, active, and fully capable of engaging in normal day-to-day activities. Since the time of the unprovoked assault, his false arrest and detention, pointing of weapon at him and others. Mr. Severino's ability to perform and enjoy his usual activities, including family and work-related activities, has been impaired. In addition, Mr. Severino has suffered severe emotional distress and mental anguish affecting his psychological well-being. Further, Mr. Severino has suffered physical injury to his back requiring medical care due to the unreasonable and unnecessary force thrust upon his person by officers at the scene.
70. Mr. Severino is entitled to compensation for the constitutional harms that the Defendants inflicted upon them, including personal injury, loss of liberty, and loss of property.

COUNT FOURTEEN – Retaliatory Actions

71. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint
72. Defendants Borough of Sayreville Chief Zebrowski, Sgt. Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator retaliated against Mr. Severino for exercising his First Amendment right to legitimately gathering information about police activities of misconduct, file civil and criminal charges against employees of the borough of Sayreville and file complaints to State and Federal authorities.
73. That at all time in this complaint Councilman Ricci Melendez was the owner of 23 Boehmhurst Ave. and rented said property out. Which plaintiff lived and paid rent. On or about Feb 2012 Def. Melendez through his super (relative) Tito told Mr. Severino he has 24 hours to get out or he would be arrested for trespassing. The acts of Ricci Melendez were done in retaliation for Mr. Severino for exercising his First Amendment right to report the borough of Sayreville and its employees for its criminal activities.

COUNT FIFTEEN - Deprivation of Property Without Due Process of Law

74. Plaintiff re-alleges and incorporates herein paragraphs 1-77 of this Complaint
75. Def. Ptl. Popowski in concert with the other defendants at the scene, intentionally violated the civil rights of Mr. Severino by his malicious and wanton disregard for his property rights.
76. Mr. Severino's whole life was in the back of his truck (jeep grand cherokee) and requested that he call his parents so they can come get his truck keys. The Officers refused this request and in fact Mr. Severino's property was removed and stolen by Ms. Souders, the Officers and the borough of Sayreville then refused to arrest and help Mr. Severino remove his property knowing that the location of the property was in a flood zone and in fact Mr. Severino lost all his property in hurricane sandy because of the retaliatory actions of the defendants.

77. Defendants either with the specific intent to violate the Plaintiff civil rights or with a reckless disregard of the probability of causing that violation, knowing and purposely allowed Mr. Severino's property be stolen and then refused to help Mr. Severino retrieve said property. Without due process of law.

78. **AS A DIRECT AND PROXIMATE RESULT** [common to all counts] of the wrongful acts of the Defendants jointly, severally and/or individually as listed in this complaint had a deliberate indifference and unlawful violation of Mr. Severino's rights, committed under the color of the law. Mr. Severino suffered and continues to suffer physical, psychological and emotional distress/anguish, anxiety, embarrassment, loss of freedom/liberty, property and employment/salary, and inconvenienced and is entitled to relief under 42 U.S.C. § 1983, The New Jersey Tort Claim Act and the Common Laws of New Jersey.

DEMAND

79. **Wherefore**, the Plaintiff demands judgment against the defendants for damages, together with interest and cost of suit.

A. Issue a declaratory judgment stating that:

1. Defendants Borough of Sayreville Chief Zebrowski, Sgt. Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator did violate Mr. Severino's constitutional rights

B. Issue an injunction ordering the defendants to:

1. Remove the false arrest from Mr. Severino's criminal record
2. That the Borough Sayreville reevaluates the defendants' employment and
3. Order the defendants to stop retaliating, filing false charges against Mr. Severino

C. Award compensatory damages in the following amounts;

1. Lost Salary for time incarcerated \$12,300.00
2. Lost Salary from injuries [to be determined at trial] as of now \$139,200.00
3. Lost property \$10,000
4. Reasonable expenses incurred in this litigation, including but not limited to attorney and expert fees, pursuant to 42 U.S.C. §1988 (b) and (c).

D. Award punitive Damages in the following amount

1. In the amount of 1 million dollars (1,000,000.00 dollars) collectively

E. Grant such other relief as it may appear that Plaintiff is entitled.

I hereby certify that the forgoing statements made by me are true and correct to the best of my knowledge and I'm aware that if any statement is willfully false Plaintiff is subject to fine and imprisonment.

Respectfully submitted,





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United States District Court
Trenton District
402 E. State St. ~~side~~
Trenton, NJ 08608
% Clerk's Office



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SUMMONS

Attorney(s) William F. Severino III
Office Address 2 Guilfoyle Terrace
Town, State, Zip Code Sayreville New Jersey 08872
Telephone Number [REDACTED]
Attorney(s) for Plaintiff PRO-SE
WILLIAM F. SEVERINO III

14 DEC 23 PM 7:32
**Superior Court of
New Jersey**

Middlesex COUNTY
CIVIL LAW DIVISION

Docket No: MID-L-6228

Plaintiff(s)

Vs.
BOROUGH OF SAYREVILLE, CHIEF ZEBROWSKI, PTL
DONNAMARIA, PASCONE, ERLA, JOHN DOW

Defendant(s)

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 available in the Civil Division Management Office in the county listed above and 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 \$175.00 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.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not 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 available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

W. Severino III
Clerk of the Superior Court

DATED: 11/30/2014

Name of Defendant to Be Served: BOROUGH OF SAYREVILLE

Address of Defendant to Be Served: 167 Main Street, Sayreville, NJ 08872

MIDDLESEX VICINAGE CIVIL DIVISION
P O BOX 2633
56 PATERSON STREET
NEW BRUNSWICK NJ 08903-2633

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 519-3728
COURT HOURS 8:30 AM - 4:30 PM

DATE: OCTOBER 15, 2014
RE: SEVERINO WILLIAM III VS BOROUGH OF SAYREVILLE
DOCKET: MID L -006228 14

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON VINCENT LEBLON

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (732) 519-3728 EXT 3728.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

WILLIAM F. SEVERINO III
2 GUILFOYLE TERRACE
SAYREVILLE NJ 08872

JUMMAR5

William F. Severino III
2 Guilfoyle Terr.
Sayreville, NJ 08872
[REDACTED]

FILED & RECEIVED #1
2014 OCT 14 P 1:02

CIVIL OFFICE
MIDDLESEX VICINAGE

WILLIAM F. SEVERINO III
PLAINTIFF,
v.

SUPERIOR COURT OF NEW JERSEY
MIDDLESEX COUNTY
LAW DIVISION - CIVIL

MID-L- 6 2 2 8 - 1 4

Docket No. _____

BOROUGH OF SAYREVILLE, CHIEF
ZEBROWSKI, PTL. DONNAMARIA
PTL. PASCONE, LT. ERLA, JOHN
DOW I,

All in their official and individual capacities
DEFENDANTS,

COMPLAINT
WITH JURY DEMAND

I. INTRODUCTION

1. This action arises under the First, Fifth and Fourteenth Amendments to the United States Constitution; specifically, 42 U.S.C. §§1983, §1985 and Art. 1 pars. 1, 2 & 18 of the New Jersey Constitution, N.J.S.A. 10:1-6, New Jersey law for (a) violation of parental rights, (b) negligence, (c) Failure to enforce parenting time order, (d) negligent supervision (e) filing a false police report (f) civil conspiracy and retaliatory action.
2. While the individual Defendants were acting in the scope of their employment and under color of state law, they refused to enforce plaintiff's parenting time order and choice to make a false police report and the defendants' actions caused irreversible harm.
3. Action is also brought against the Borough of Sayreville for its failure to properly train and supervise the individual Defendants in properly enforcing court orders for parenting time and not filing factious police reports and its establishment of policies, procedures, practices, and customs regarding disciplinary procedures and enforcing parenting time orders.
4. Plaintiff is seeking all equitable relief, including compensatory and punitive damages sustained due to the deliberate, knowingly, multiple violations of federal and state constitutional provision, State regulations and statues including the deliberate conspiracy to violate these laws and regulations.

II. JURISDICTION AND VENUE

5. This Court has Jurisdiction over the subject matter under State and Federal Constitutional provisions and the common law of the State of New Jersey.
6. Venue in Middlesex County is proper all alleged herein arise from factual allegations occurring in this judicial district.

III. THE PARTIES

7. Plaintiff, William F. Severino III is a citizen of the United States and resides in Middlesex County.
8. Defendant, Borough of Sayreville, is responsible for the training and supervision of Defendants, Borough of Sayreville has established or delegated to Defendant Zebrowski the responsibility for establishing and implementing policies, practices, procedures, and customs used by law enforcement officers employed by Borough of Sayreville.
9. Defendant, Chief Zebrowski was at all times material to the allegations in this Complaint, employed as the Chief of Police by the Sayreville Police Department and is responsible for the supervision and training of the Defendants,
10. Defendant, Lt. D. Erla was acting in his capacity as a Police Officer employed by the Borough of Sayreville and was acting under color of state law.
11. Defendant, Ptl. Donnamaria, was acting in his capacity as a Police Officer employed by the Borough of Sayreville and was acting under color of state law.
12. Defendant, Ptl. Pascone, was acting in his capacity as a Police Officer employed by the Borough of Sayreville and was acting under color of state law.
13. Defendant, John Dow 1, was acting in his capacity as a Police Officer employed by the Borough of Sayreville and was acting under color of state law.

IV. FACTUAL BASIS COMMON TO ALL CLAIMS

14. On Oct 2, 2013 Mr. Severino filed a motion requesting more visitation time for Oct 13, 2012 so he can have more time throwing his daughter her birthday party. The attorneys in the dyfs case had a phone conference on the issue and Mr. Severino got one hour before and one hour after his normal visitation time.
15. On Oct 13, 2013 Ms. Souders refused to answer Mr. Severino Jr. phone calls, texts, or answer the door when Mr. Severino Jr. knocked on the door to pick Ireland (child) up for the court order visitation time. Mr. Severino (iii) then called the police were Ptl. Donnamaria (dispatcher) told Mr. Severino that the police don't enforce parenting time orders that it is not their job.

Plaintiff than argued that it is the police's job and duty and to send a car over so Mr. Severino (iii) could file a report and file criminal charges.

16. Apx. 1 hour later Mr. Severino (iii) called back to see where the officer was and was told that he wasn't sending a car over that it wasn't the police's responsibility to involve.
17. At 2:15 pm Ptl. Donnataria sent Officer Pascone to Ms Souder's who called the police and reported violation of the restraining order, claiming I was calling and harassing her.
18. At apx. 3 pm officer Pascone was at my house with Officer John Dow 1 threatening to arrest me for violation of the restraining order. My family then told the officer that it was my visitation day and that my father was the one calling and knocking on the day. The officer went to his car and called someone (most likely the Lt.) and came back and told Mr. Severino (iii) to report it to the court on Monday.
19. At apx. 6 pm officer Pascone wrote and filed a false police report and refused to place in the report that Ms. Souder's denied Mr. Severino his visit with his daughter and wrote the report to make it appear that plaintiff committed acts of domestic violence and harassed Ms. Souder's
20. Thereafter Lt. Erla and Chief Zebrowski approved the false innocent report
21. Thereafter members of the Sayreville police department continued to refuse to enforce the parenting time order over 90 times.

V. CAUSES OF ACTION

COUNT I

Violation of Civil Rights-General Allegations

22. Plaintiff realleges the allegations set forth in paragraphs 1-55 of this complaint
23. In committing the acts complained of herein, defendants acted under color of state law to deprive plaintiff of constitutionally protected rights under State & Federal Constitutional provisions including but not limited to.
 - a) Refused to enforce parenting time court order
 - b) Refuse to file criminal charges
 - c) Filing false police report
 - d) Conspiracy to violate plaintiff's parental rights
 - e) Retaliation actions for exercising rights.
24. In violating plaintiff's rights as set forth above and other rights that will be proven at trial, defendants acted under color of state law and conspired with one another to deny the plaintiff his parental rights and refused to file the appropriate criminal charges and filed false police reports to make it appear that plaintiff committed domestic violence and harassment.

25. Borough of Sayreville and Chief Zebrowski for its failure to properly train and supervise the individual defendants and following its establishment of policies, procedures, practices, customs and state laws regarding parenting time orders, writing police reports and disciplinary actions.
26. As a direct and proximate result of the violation of plaintiff's constitutional rights by the defendant's, plaintiff was injured, damaged, libeled, and caused extreme emotional distress to the plaintiff herein and is entitled to relief.
27. The conduct of defendants was willful, malicious, oppressive and/or reckless, and was of such a nature that punitive damages should be imposed in an amount commensurate with the wrongful acts alleged herein.

COUNT II

Failure to Implement Appropriate Policies, Customs and Practices

28. Plaintiff reallege the allegations set forth in paragraphs 1-55 of this complaint
29. Defendant Borough of Sayreville and Chief Zebrowski, implicitly or explicitly adopted and implemented careless and reckless policies, customs, or practices, that includes, among other things, to tell officers Not to enforce court orders, enforce the laws of New Jersey and to write false police reports.
30. Defendant Borough of Sayreville and Chief Zebrowski implicitly or explicitly adopted and implemented careless and reckless policies, customs, or practices that did allow police officers to ignore court orders, the laws of New Jersey and write false police reports.
31. The failure of the Borough of Sayreville and Chief Zebrowski to adequately train and supervise the officers amount to deliberate indifference to the rights of the plaintiff's parental rights under the 1st, 5th and 14th Amendments to the Constitution of the United State & other common laws.
32. As a result of this indifference, Mr. Severino lost the relationship with his daughter by having his parental time interfered with and suffered psychological/emotional hardship.

COUNT III

Negligent Supervision/Respondent Superior

33. Plaintiff reallege the allegations set forth in paragraphs 1-55 of this complaint
34. Defendants Borough of Sayreville and Chief Zebrowski owed plaintiff a duty to perform their job with duly diligence and respond to the complaint of how the case was being handled at the time of the aforementioned incidents.
35. Defendants Borough of Sayreville and Chief Zebrowski negligently supervised the officers by failing to provide proper training and outline proper procedure and policies in enforcing court orders, the laws of New Jersey and writing misleading police reports.
36. In committing the aforementioned acts or omissions, each defendant negligently breached said duty, which directly and proximately resulted in the injuries to plaintiff as alleged herein.

COUNT VI
Deprivation of Parental Time Rights

37. Plaintiff reallege the allegations set forth in paragraphs 1-55 of this complaint
38. Defendants, Ptl. Pascone, Ptl. Donnamaria, Lt. Erla, Chief Zebrowski and Sayreville police department in concert with one another intentionally violated the civil rights of the plaintiff by their malicious and wanton disregard for plaintiff's parental rights. Their refusal to enforce the parenting time order on numerous occasions amounted to deprivation of parental rights in violation of the fifth and fourteenth amendments. (to date 90 visits and counting).
39. Plaintiff had a father daughter relationship with his daughter and shared affection, friendship, solace and love for the period of her life up until the time the officers began to refuse to enforce the parenting time order.
40. As a result Mr. Severino lost the relationship with his daughter by having his parental time interfered with and suffered psychological/emotional hardship.

COUNT V
Conspiracy to Violate Plaintiffs Civil Rights

41. Plaintiff reallege the allegations set forth in paragraphs 1-55 of this complaint
42. The defendants in this case present at the aforementioned incident subsequently participated in a common design through a concert of actions to violate plaintiff's civil and parental rights and submitted to the goal of Mrs. Souders to prevent daughter having a birthday party.
43. In committing the aforementioned acts each defendant directly and proximately injured, damaged, libeled, and caused extreme emotional distress to the plaintiff herein and is entitled to relief
44. As a direct and proximate result of the violation of plaintiff's constitutional rights by the defendant's plaintiff was injured, damaged, libeled, and caused extreme emotional distress to the plaintiff herein and is entitled to relief.

COUNT VI
Filing False Police Reports & Refusal to File Police Reports and criminal charges

45. Plaintiff reallege the allegations set forth in paragraphs 1-55 of this complaint
46. On Said Date defendant Ptl. Donnamaria refused to send an officer to Mr. Severino's resident so he can file a report and have criminal charges filed against daughter's mother for interference with parental time and contempt of court.
47. Instead Ptl. Donnamaria sent Ptl. Pascone to answer a domestic violence call and did in fact attempt to arrest plaintiff for domestic violence and then proceeded to write a false police report

and made it appear that the plaintiff committed an act of domestic violence and was harassing daughter's mother.

48. The defendants then failed to put in the report that mother was refusing to produce the child for father's parenting time.
49. Defendant Lt. Erla and Chief Zebrowski approved the false report knowing that the events did not take place and further refused report that Ms. Souders (daughter's mother) was interfering with the plaintiff's parenting time.
50. Defendants had an obligation and a duty to insure truthful police reports are being filed.
51. As a direct and proximate result of the violation of plaintiff's first fifth and fourteenth constitutional rights by the defendant's, plaintiff was injured, damaged, libeled, and caused extreme emotional distress to the plaintiff herein and is entitled to relief.

COUNT VII

Retaliatory Actions

52. Plaintiff reallege the allegations set forth in paragraphs 1-55 of this complaint
53. The Defendants' knowingly and purposely refused to enforce plaintiff's parenting time order in retaliation of plaintiff excusing his first amendment constitutional rights for filing lawsuits and complaints against the defendants.
54. Defendants' with the specific intent to violate the plaintiff's parental rights with a reckless disregard of the probability of causing that violation was so extreme and outrageous that it went beyond the bounds of decency. It would be considered atrocious and utterly intolerable in a civilized community. The separation caused severe emotional distress to plaintiff that plaintiff had to seek mental health counseling. And caused severe psychological damage to his daughter. Plaintiff is entitled to punitive damages.

"DEMAND"

55. Wherefore plaintiff demands judgment against the defendant for damages, interest and costs of suit.

A. Issue a declaratory judgment stating that:

1. Defendants' violated plaintiff's parental rights to visitation by refusing to enforce the parenting time order
2. That the defendants' conspired to violated plaintiff's parental rights
3. That Borough Sayreville and Chief Zebrowski negligently supervised its officers.

B. Issue an injunction ordering the defendants to:

1. File criminal charges against Ms. Souders for interfering with parenting time (N.J.S.A. 2C:13-4(a)) and contempt of court (NJSA 2C:29-9).
2. To enforce plaintiff's parenting time order.
3. To stop retaliating against the plaintiff for exercising his constitutional right to file grievances and/or complaints against them.

C. Award compensatory damages in the following amounts;

1. Reimburse plaintiff the money he spent on the birthday party \$700.00
2. Attorney fees and cost and interest of suit

D. Award punitive Damages in the following amount

1. 1.5 million dollars

E. Grant such other relief as it may appear that plaintiff is entitled.

I hereby certify that the forgoing statements made by me are true and correct to the best of my knowledge and I'm aware that if any statement is willfully false Plaintiff is subject to fine and imprisonment.

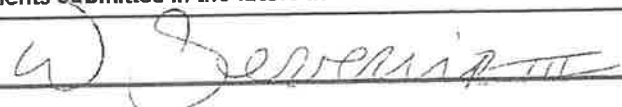
Respectfully Submitted,

A handwritten signature in black ink, appearing to read "W. Severino III". The signature is fluid and cursive, with a large initial "W" and a stylized "S".

William F. Severino III

Dated September 29, 2014

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		FILED & RECEIVED 2014 OCT 14 CIVIL OFFICE MIDDLESEX		FOR USE BY CLERK'S OFFICE ONLY FILED #1: ☐ CK ☐ CG ☐ CA CHG/CK NO.: AMOUNT: OVERPAYMENT: BATCH NUMBER:
	Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed				
	ATTORNEY / PRO SE NAME WILLIAM F. SEVERINO iii		TELEPHONE NUMBER 		COUNTY OF VENUE Middlesex
	FIRM NAME (if applicable)		DOCKET NUMBER (when available) MID-L- 6 2 2 8 - 1 4		DOCUMENT TYPE COMPLAINT
OFFICE ADDRESS 2 GUILFOYLE TERRACE SAYREVILLE, NJ 08872			JURY DEMAND ☒ Yes ☐ No		
NAME OF PARTY (e.g., John Doe, Plaintiff) William F. Severino iii Plaintiff		CAPTION SEVERINO V. BOROUGH OF SAYREVILLE et. al.			
CASE TYPE NUMBER (See reverse side for listing) 005	HURRICANE SANDY RELATED? ☐ YES ☒ NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ☒ NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.			
RELATED CASES PENDING? ☐ Yes ☒ No		IF YES, LIST DOCKET NUMBERS			
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? ☐ Yes ☒ No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) Middlesex County Joint Insurance Fund ☐ NONE ☐ UNKNOWN			
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.					
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION					
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? ☐ Yes ☒ No		IF YES, IS THAT RELATIONSHIP: ☐ EMPLOYER/EMPLOYEE ☐ FRIEND/NEIGHBOR ☐ OTHER (explain) ☐ FAMILIAL ☐ BUSINESS			
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? ☐ Yes ☐ No					
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION					
DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? ☐ Yes ☒ No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION			
WILL AN INTERPRETER BE NEEDED? ☐ Yes ☒ No		IF YES, FOR WHAT LANGUAGE?			
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).					
ATTORNEY SIGNATURE: 					

NOTICE OF CLAIM

THIS CLAIM FORM MUST BE FILED WITHIN NINETY (90) DAYS OF ACCIDENT/OCCURRENCE OR YOU MAY FORFEIT YOUR RIGHTS PURSUANT TO N.J.S.A. 59:1 ET SEQ.

FORWARD TO:

BOROUGH OF SAYREVILLE
DEPARTMENT OF ADMINISTRATION
167 MAIN STREET, SAYREVILLE, NJ 08872

1) CLAIMANT:

Severino, William F.
Last First Middle

[REDACTED]
(Area Code) Phone#

2 Guilfoyle Terrace
Street Address

Additional Address

Sayreville, NJ 08872
City/State Zip Code

9/26/71 [REDACTED]
D/O/B SS#

2) IF NOTICE AND CORRESPONDENCE IN CONNECTION WITH THIS CLAIM ARE TO BE SENT TO A PERSON OTHER THAN CLAIMANT, PLEASE COMPLETE ITEM #2:

Last First Middle

(Area Code) Phone#

Street Address

Additional Address

City State Zip Code

D/O/B SS#

3)

A) THE OCCURRENCE OR ACCIDENT WHICH GAVE RISE TO THIS CLAIM:

November 1, 2014
Date

Apx 1:30 pm
Time

B) DESCRIBE THE LOCATION OR PLACE OF THE ACCIDENT OR OCCURRENCE:

Sayreville
Municipality

2 Guilfoyle terrace
Exact Location

C) DESCRIBE HOW THE ACCIDENT OR OCCURRENCE HAPPENED. IF A DIAGRAM WILL ASSIST YOUR EXPLANATION, PLEASE USE THE REVERSE SIDE OF THIS FORM:

D) STATE THE NAME ADDRESS OF THE MUNICIPALITY OR AGENCY THAT YOU CLAIM CAUSED YOUR DAMAGE:

office C
office John Dow

E) STATE THE NAMES OF MUNICIPALITY'S EMPLOYEES WHOM YOU CLAIM WERE AT FAULT, INCLUDING ANY INFORMATION THAT WILL ASSIST IN IDENTIFYING THEM:

Borough of Sayreville
Sayreville Police Department

F) STATE IN DETAIL EACH AND EVERY NEGLIGENT OR WRONGFUL ACT OF THE MUNICIPALITY EMPLOYEES WHICH CAUSED YOUR DAMAGE:

false Arrest
Malouse Prosecution
Retaliatory Actions
false Imprisonment

Conspiracy to Steal

G) STATE THE NAME AND ADDRESS OF ALL WITNESSES TO THE ACCIDENT OR OCCURRENCE:

NONE

H) IF VEHICLE ACCIDENT, STATE THE NAMES, ADDRESS, AGE AND RELATIONSHIP TO INSURED OF ALL PASSENGERS IN YOUR VEHICLE:

NONE

I) STATE THE NAMES OF ALL POLICE OFFICERS AND POLICE DEPARTMENTS WHO INVESTIGATED THE ACCIDENT:

NONE I.A. refuse

4)

A) CLAIM FOR DAMAGES (check appropriate box):
☒ BODILY INJURY ☒ PROPERTY DAMAGE

☒ OTHER EXPLAIN

Property that was stolen
lost of wages/income
Psychological Trauma

B)

- 1) IF YOU CLAIM INJURY, DESCRIBE YOUR INJURIES RESULTING FROM THIS ACCIDENT OR OCCURRENCE:

Psychological

- 2) DO YOU CLAIM PERMANENT DISABILITY RESULTING FROM THIS INJURY?
☒ YES ☐ NO

IF YES, DESCRIBE THE INJURIES BELIEVED TO BE PERMANENT.

Severe Psychological Damage, That I'll have to be medic'd rest my life.

- 3) FOR EACH HOSPITAL, DOCTOR, OR OTHER PRACTITIONER RENDERING TREATMENT, EXAMINATION OR DIAGNOSTIC SERVICE, STATE:

NAME & ADDRESS OF HOSPITAL, DOCTOR, OR OTHER FACILITY	DATES OF TREATMENT	AMOUNT OF CHARGE TO DATE	AMOUNT PAID OR PAYABLE BY OTHER INSURANCE
A) <i>Wail</i>	<i>Nov 1-27, 2014</i>	<i>Ø</i>	<i>Ø</i>
B) <i>RBMH</i>	<i>Dec 1, 2014</i>		
C)			
D)			

4) IF YOU CLAIM LOSS OF WAGES OR INCOME AS A RESULT OF THE INJURY, STATE:

Jet / Pelle's Underground Tattoo
Name of Employer

Ware house / Tattoos est
Your Occupation

10000 hour / 100\$ hour
Rate of Pay

mainst stay. / 2 Gail / 501/2
Address

2008 / 2008
Date Employed at this job

Nov 1 - 27 2014
Dates of Absences from Work

NOTE: IF YOUR CLAIMED LOSS OF INCOME ARISES FROM SELF-EMPLOYMENT OR OTHER THAN WAGE, ATTACH A CALCULATION ON THE BASIS OF YOUR CALCULATION OF LOSS INCOME.

5) SET FORTH ANY AND ALL OTHER LOSSES OR DAMAGES CLAIMED BY YOU:

TV, Silver Coins, Laptop, Computer, Kiss dolls,
Refriger, clothes

C) IF YOU CLAIM PROPERTY DAMAGE:

- 1) DESCRIBE THE PROPERTY DAMAGED, IF VEHICLE, INCLUDE MAKE, MODEL, YEAR, COLOR, VEHICLE IDENTIFICATION NUMBER, LICENSE PLATE NUMBER, STATE, AND PARTS OF VEHICLE DAMAGED:

None Damaged Just Stolen

- 2) THE PRESENT LOCATION AND TIME THE PROPERTY CAN BE INSPECTED:

when ever you like to make an
appointment.

3) DATE PROPERTY WAS ACQUIRED:

2010 to Present

4) COST OF PROPERTY:

5,000

5) VALUE OF PROPERTY AT THE TIME OF ACCIDENT:

5,000

6) DESCRIPTION OF DAMAGE:

stolen by cop

7) HAS THE DAMAGE BEEN REPAIRED?

☐ YES

☐ NO

IF YES, BY WHOM, AND COST OF REPAIRS:

NO

8) ATTACH EACH ESTIMATE OF REPAIR COST TO THIS FORM.

9) SET FORTH IN DETAIL THE LOSS CLAIM BY YOU FOR PROPERTY DAMAGE:

D) SET FORTH IN DETAIL ALL OTHER ITEMS OF LOSS OR DAMAGES CLAIMED BY YOU AND THE METHOD BY WHICH YOU MADE THE CALCULATIONS:

5) THE AMOUNT OF THE CLAIM:

100,000

- 6) HAVE YOU MADE A CLAIM AGAINST ANYONE ELSE FOR ANY OF THE LOSSES OR EXPENSES CLAIMED IN THIS NOTICE?
☐ YES ☒ NO

IF YES, SET FORTH THE NAMES AND ADDRESSES OF ALL PERSONS AND THE INSURANCE COMPANIES AGAINST WHO YOU HAVE MADE SUCH CLAIMS:

- 7) ARE ANY OF THE LOSSES OR EXPENSES CLAIMED HEREIN COVERED BY ANY POLICY OF INSURANCE?
☐ YES ☒ NO

FOR EACH SUCH POLICY, STATE THE NAME AND ADDRESS OF THE INSURANCE COMPANY, POLICY NUMBER AND BENEFITS PAID OR PAYABLE:

- 8) HAVE YOU RECEIVED OR AGREE TO RECEIVE ANY MONEY FROM ANYONE FOR DAMAGES CLAIMED HEREIN?
☐ YES ☒ NO

IF YES, SET FORTH THE DETAILS OF SUCH AGREEMENT:

9) THE FOLLOWING ITEMS MUST BE SUBMITTED WITH THIS NOTICE:

- 1) COPIES OF ITEMIZED BILLS FOR EACH MEDICAL EXPENSE AND OTHER LOSSES AND EXPENSES CLAIMED.
- 2) FULL COPIES OF ALL APPRAISALS AND ESTIMATES OF PROPERTY DAMAGE CLAIMED BY YOU.
- 3) COPIES OF ALL WRITTEN REPORTS OF ALL EXPERT WITNESSES AND TREATING PHYSICIANS.
- 4) A LETTER FROM YOUR EMPLOYER VERIFYING YOUR LOST WAGES. IF SELF EMPLOYED A STATEMENT SHOWING CALCULATIONS OF YOUR LOST INCOME.

*See Exhibit
Below*

I HEREBY CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE, THAT THE ATTACHED STATEMENTS, BILLS, REPORTS AND DOCUMENTS ARE THE ONLY ONE KNOWN TO ME TO BE IN EXISTENCE AT THIS TIME. I AM AWARE THAT IF ANY STATEMENT MADE HEREIN IS WILLFULLY FALSE OR FRAUDULENT, I AM SUBJECT TO PUNISHMENT AS PROVIDED BY LAW.

DATED: NOV 30, 2014

W Severino III
Claimant or person filing on behalf of claimant

William F. Severino III
Print name as signed above

Pelle's Tattoos

200\$ A day x 27 days = 2,700\$

24

10:00 hour x 8 = 80.00 x 27 days = 2,160\$

HIPAA COMPLIANT AUTHORIZATION
TO DISCLOSE HEALTH INFORMATION

Please provide an authorization for each medical provider

Patient Name: William
Address: _____
SS#: Don't App 11
DOB: _____

I hereby authorize the below listed physician/medical provider/hospital to release **ANY AND ALL RECORDS IN THEIR POSSESSION PERTAINING TO ME**, included by not limited to, medical office, and/or treatment records; office notes, treatment examination and/or consultation reports, diagnostic test results, X-ray, MRI and CT Films and Reports from: **The Past (5) years.**

Provider Name and Address: _____

None available

This information may be disclosed to:

**The Middlesex County Municipal Joint Insurance Fund Claims Department and/or its Representatives
2 Jocama Boulevard
Old Bridge, New Jersey 08857**

For the purpose of: **I am a claimant in a personal injury matter.**

I understand that I have the right to revoke this authorization at any time. I understand that my revocation must be in writing and addressed to the privacy office of the above named facility authorized to make this disclosure. I understand that the revocation does not apply to information that has already been released in response to this authorization. Unless otherwise revoked this authorization will expire on the following date: 6 months.

I understand that any disclosure of information may be subject to re-disclosure by the recipient and may no longer be protected by federal or state law. I understand that I need not sign this authorization to assure treatment. I understand that I may inspect and/or copy the information to be disclosed. I understand that authorizing this disclosure is voluntary. I understand that if I have any questions about disclosure of my health information, I may contact the privacy officer at the facility listed above that is authorized to disclose this information.

I understand that my health records may include information pertaining to treatment of drug and alcohol abuse, mental illness, acquired immunodeficiency syndrome (AIDS), or human immunodeficiency virus (HIV), sexually transmitted diseases, tuberculosis or genetics. **If you do not wish this information to be released**

please initial;
Do not release WS

W Severino
Signature of Patient or Authorized Representative

Nov. 30, 2014
Date

Description of Representative's Authority
(Witness signature required)

Signature of Witness

AUTHORIZATION FOR INFORMATION ON EMPLOYMENT

TO WHOM IT MAY CONCERN:

YOU ARE HEREBY AUTHORIZED TO DISCLOSE, MAKE AVAILABLE AND FURNISH TO THE MIDDLESEX COUNTY MUNICIPAL JOINT INSURANCE FUND CLAIMS DEPARTMENT OR ITS REPRESENTATIVES ANY AND ALL MEDICAL INFORMATION CONCERNING MY EMPLOYMENT, PAST OR PRESENT, INCLUDING RATE OF PAY, DUTIES TO BE PERFORMED, DATES OF ABSENCES AND REASONS THEREFORE.

A PHOTOCOPY OF THIS DOCUMENT WILL BE ACCEPTABLE AS AN ORIGINAL.

DATED: NOV 30, 2019

W Severino III
Signature

William F. Severino III
Print name as signed above

Main Form

Page 1 of 2

SAYREVILLE POLICE DEPARTMENT
SAYREVILLE, NJINCIDENT # / REPORT #

14020690 / 1

OFFICER

CEBULSKI, K

RANK

PATROLMAN

REVIEW STATUS

APPROVED

INCIDENT # 14020690 DATA

AS OF 11/02/2014 13:45:49

BASIC INFORMATION

CASE TITLE

SIMPLE ASSAULT

LOCATION

2 GUILFOYLE TER

ACT/UNIT #DATE/TIME REPORTED

11/01/2014 13:23:26

DATE/TIME OCCURRED

On or about 11/01/2014 13:23

INCIDENT TYPE/OFFENSE

SIMPLE ASSAULT

PERSONS

ROLE

VICTIM

NAME

SEVERINO, JOHN

SEX

MALE

RACE

WHITE

OFFENDERS

STATUS

DEFENDANT

NAME

SEVERINO, WILLIAM FRANCIS

SEX

MALE

RACE

WHITE

[NO VEHICLES]

[NO PROPERTY]

OFFICER REPORT: 14020690 - 1 / CEBULSKI, K (PATROLMAN)

DATE/TIME OF REPORT

11/01/2014 13:23:26

TYPE OF REPORT

INCIDENT

REVIEW STATUS

APPROVED

NARRATIVE

On Saturday November 1, 2014 at approximately 1323 Hrs. P.M. Baron and I were dispatched to 2 Guilfoyle Terrace for a domestic. Upon arrival, I spoke to Mr. John Severino who was bleeding under his left eye and had a cracked front tooth. Mr. J. Severino stated that when he arrived at his parents house to retrieve some of his belongings since moving out a few weeks ago, his older brother Mr. William Severino punched him once in the face with a closed fist causing the injuries. Mr. J. Severino stated that his brother did not want him in the house

Main Form

Page 2 of 2

and that is specifically why he was assaulted.

I spoke to Mr. William Severino who stated that when his younger brother John showed up today and when he walked into the house he punched him in the face because some of his daughters property has been missing. Mr. W. Severino stated that his brother is a drug addict and has been stealing to support his habit. Mr. W. Severino related that his brother knew he was not welcome to walk in the house and should not have come over without another family member.

I placed Mr. W. Severino under arrest for the Domestic Violence Simple Assault. The handcuffs were double locked and Mr. W. Severino was searched incident to arrest. I seated Mr. W. Severino in the rear of patrol unit #10. Mr. W. Severino was transported to headquarters and prior to removing him from the vehicle our service weapons were secured in the gun locker located in the sally port. Mr. W. Severino was seated in the arrest room where he was processed and fingerprinted. Lt. Novak contacted Judge Weber who set bail at \$2500.00. This officer took two pictures of the injuries to Mr. J. Severino which were added to this case file. Mr. J. Severino signed off on the V.I.N.E. form understanding his rights and refusing a Temporary Restraining Order.

Mr. W. Severino was ultimately transported to the Middlesex County Adult Correctional Facility without incident.

REPORT OFFICERS

Reporting Officer:

CEBULSKI, K

PATROLMAN

Approving Officer:

NOVAK, J

LIEUTENANT

SUMMONS

Attorney(s) WILLIAM F. SEVERINO III

Office Address 2 GUILFOYLE TERRACE

Town, State, Zip Code SAYREVILLE, NJ 08872

Telephone Number _____

Attorney(s) for Plaintiff PRO-SE

WILLIAM F. SEVERINO III
Plaintiff(s)

Vs.

Borough of Sayreville et al.

Defendant(s)

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 available in the Civil Division Management Office in the county listed above and 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.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not 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 available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

W. Severino
Clerk of the Superior Court

DATED: July 14, 2014

Name of Defendant to Be Served: Borough Sayreville / mayor's Office et al.

Address of Defendant to Be Served: 68 main st. Sayreville, NJ 08872

Superior Court of New Jersey

MIDDLESEX COUNTY

CIVIL DIVISION

Docket No: m:d-L-3697-14

CIVIL ACTION SUMMONS

14 JUL 2014

William F. Severino III
2 Guilfoyle Terrace
Sayreville, N.J. 08872
[REDACTED]

05-13-10
RECEIVED AND FILED
2014 JUN 13 A 10:34

William F. Severino III
PLAINTIFF
v

SUPERIOR COURT OF NEW JERSEY
MIDDLESEX COUNTY
LAW DIVISION - CIVIL

Borough of Sayreville, Chief Zebrowski
Lt. John Dow 1, Ptl. Kilcomms, Ptl John
Dow 2, Ptl John Dow 3
In their individual and official capacities
DEFENDANTS

Docket No. L-3697-14

**CIVIL COMPLAINT
WITH JURY DEMAND**

"INTRODUCTION"

This action is brought pursuant to 42 U.S.C. §1983, §1985(2) (3), §1986 and §1988 and the First, Fourth, Eighth, and Fourteenth Amendments to the United State Constitution. Under the New Jersey Constitution; Title 10 et seq. New Jersey tort liability; under Title 59 et seq., and under New Jersey common laws for (a) Failure to implement appropriate policies, customs and practices, (b) Malicious prosecution (c) Civil conspiracy (d) Retaliatory Action (e) Abuse of Process (f) Negligence (g) Negligent supervision (h) Negligent hiring (j) Intentional infliction of emotional distress

Action is also brought against the Borough of Sayreville for its failure to properly train and supervise the individual defendants and its establishment of policies, procedures, practices, and customs regarding witness intimidation, disciplinary procedures and filing false charges.

Plaintiff is seeking all equitable relief, including compensatory and punitive damages sustained due to the deliberate, knowingly, multiple violations of federal and state constitutional provision, State regulations and statues including the deliberate conspiracy to violate these laws and regulations.

"JURISDICTION"

1. Jurisdiction and Venue is proper in Middlesex County Superior Court, all parties and relevant events took place in Middlesex County.

"THE PARTIES"

2. Plaintiff, William F. Severino, is a citizen of the United States and resides in New Jersey.
3. Defendant, Borough of Sayreville, is responsible for the training and supervision of Defendants, Borough of Sayreville has established or delegated to Defendant Zebrowski the responsibility

1 Badge # 128

4. Defendant, Chief Zebrowski was at all times material to the allegations in this Complaint, employed as the Chief of Police by the Sayreville Police Department and is responsible for the supervision and training of the Defendants, further, responsible for making and/or implementing policies and practices used by law enforcement officers regarding arrests and the use of force.

6. Defendants, Ptl John Dow 1 and 2 are citizen and residents of New Jersey and was at all times material to the allegations in this Complaint, acting in their capacity as a Police Officer employed by the Borough of Sayreville and was acting under color of state law.

7. On June 17, 2012 Mr. Severino was going out with his daughters and their mother [Ms. Souders] on father's day who drove to Quick Check while she was stopped at the traffic light 3 police cars were leaving making left hand turns. [Ptl. Kilcomins, John Dow 1, and John Dow 2]

9. As Mr. Severino was looking into the rear view mirror [to look at his daughter] he saw a police

Kilco 12 and I got it again after he ran my drivers license goin' around as g to
truck ive m cket driving on the revoke list, which told ited hi peak va to s
his Lt ohn with J Don drivers we were on I ran it for him and said that a r tow
ruck, i tead my t ns he my fath me to call the property in questio n
[and I played on since 1974] and my father and brother came and got the tru ck.

14. On June 23, 2012, [redacted] was arrested and harassed again by the Sayre police. He was taken to the Middlesex County Jail for 2 months, which he also remained in the Middlesex County Jail for 2 months.

court date of June 24, 2012 and a warrant was issued against him as well a failure to appear on his record by Judge Weber (even thou the same judge and court clerk issued the original warrant apx 4 days earlier and knew he was incarcerated) Mr. Severino was found not guilty and released on August 3, 2012 (officer had no probable cause – suit pending)

15. The Present ticket is still pending and waiting trial which the Sayreville Municipal Court refuses to dispose of this matter – a law suit is in the works against Sayreville Municipal Court ect. for their refusal to set a trail date and dispose of the matter.

“COMPLAINT”

COUNT ONE -General Allegation

16. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint.
17. In committing the acts complained of herein, Defendants acted under the color of the law to deprive Plaintiff of certain constitutionally protected rights but not limited to: (a) Failure to implement appropriate policies, customs and practices, (b) Malicious prosecution (c) Civil conspiracy (d) Retaliatory Action (e) Abuse of Process (f) Negligence (g) Negligent supervision (h) Negligent hiring and retention (i) Intimidation (j) Intentional infliction of emotional distress
18. In violating Plaintiff's rights as set forth above and other rights to be proven at trial, Defendants Sayreville Police Officers acted under the color of the law and conducted an unlawful detainment and deprivation of liberty without due process in violation of Plaintiff's Constitutional and common law rights under the First, Fourth, Fifth, Eighth and Fourteenth Amendments of the United States Constitution.
19. Defendants' acts were willful, wanton, malicious, oppressive and done with conscious disregard and deliberate indifference for Plaintiff's rights. Defendants' policies, practices, conduct and acts alleged herein have resulted and will continue to result in irreparable injury to the Plaintiff.

COUNT TWO -Failure to Implement Appropriate Policies, Customs, and Practices

20. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint.
21. On the stated date and time, all defendants did violate Mr. Severino's Constitutional rights and did so pursuant and custom to a de-facto pattern and practice of the defendant's deliberate indifference to the constitutional rights of Mr. Severino. Def. Borough of Sayreville and Sayreville Police Dept. implicitly and explicitly adopted and implemented careless and reckless policies, customs, or practices that included among other things displaying a pattern and practice of retaliatory acts, confronting and using excessive force against non-violent citizens' without any reasonable training and in such a way as to cause injuries to citizens' without lawful justification and write false and misleading police reports and filing false charges against the plaintiff and failing to have disciplinary procedures.
22. The failure of Borough of Sayreville and Sayreville Police Dept. to adequately train and supervise Chief Zebrowski, Lt. John Dow 1, Ptl. Kilcommins, Ptl. John Dows 2 and 3 as deliberate indifference to the civil rights of Mr. Severino

COUNT THREE - Filing a False Complaint and False Detention

23. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint
24. Ptl. Kilcomins acted under the color of the law by falsely detaining and filing a false complaint/ticket against Mr. Severino with no basis in fact or law to do so. The Defendant denied Mr. Severino his rights, privileges, and/or immunities secured by the United States Constitution depriving him of his liberty without probable cause.
25. Defendants, Ptl. Kilcomins, Lt. John Dow 1, Ptl. John Dows 2 and 3 breached a duty of care owed to Plaintiff so as not to deprive him of his personal liberty by intentionally, wrongfully and unlawfully detaining him without probable cause and without a warrant from the Court.
26. Mr. Severino alleges that such acts directed towards him were malicious and belligerent and the acts were done with a conscious disregard for his right to be free from such tortuous behavior such as to constitute oppression and malice behavior.
27. On June 17, 2012 the plaintiff was in fact detained against his will and in the custody of Ptl. Kilcomins, Ptl. John Dows 2 and 3 and was confined for 2 hours before being released

COUNT FOUR - Malicious Prosecution

28. Mr. Severino preserves his right to bring this count later in time. Presently this case is still pending in the Sayreville Municipal Court were they refuse to produce discovery, the names of John Dows, give Mr. Severino a probable cause hearing , and set a trial date.

COUNT FIVE - Conspiracy

29. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint
30. It is unlawful for two or more persons to conspire to injure, oppress, threaten, or intimidate any person of any state, territory or district in the free exercise or enjoyment of any right or privilege secured to him/her by the Constitution or the laws of the United States, (or because of his/her having exercised the same).
31. The Def. Borough of Sayreville, Chief Zebrowski, Lt. John Dow 1, Ptl. Kilcomins, John Dows 2 and 3 and others engaged in a course of conduct designed to delay, obstruct and impair the investigation into the unlawful stop of Mr. Severino, beginning with the decision to unlawfully detain and charge him without reason or cause, file false reports and attempt to hide the reason of probable cause and engage in a malicious prosecution of Mr. Severino
32. The defendants stand to gain by terrorizing, torturing, and preventing Mr. Severino from focusing on filing criminal and civil complaints against them for their violations of federal and state laws. The defendants did conspire with one another to cover-up the unlawful detention and charges. In furtherance of the plan to cover-up the incident the Defendants initiated a malicious prosecution against him to intimidate him to withdraw a pending law suit and criminal charges against other members of the Sayreville police dept.

COUNT SIX - Retaliatory Actions

33. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint

34. Defendants Borough of Sayreville, Chief Zebrowski, Lt. John Dow 1, Ptl. Kilcomins, Ptl. John Dows 2 and 3 retaliated against Mr. Severino for exercising his First Amendment right to legitimately gathering information about police activities of misconduct file civil and criminal charges against employees of the Borough of Sayreville and file complaints to State and Federal authorities by continually detaining, arresting and filing false charges against Mr. Severino in the last several years the Sayreville police dept has arrested Mr. Severino apx. 10 times, filed numerous false traffic tickets, filed false police reports ect.

COUNT SEVEN - Negligence /Negligent Supervision

35. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint

36. Def. Chief Zebrowski, Lt. John Dow 1, Ptl. Kilcomins, Ptl. John Dows 2 and 3 were negligent in their performance and/or failure to perform duties undertaken in the course of their employment, including but not limited to failure to use due care at or about the times of the aforementioned incident. In committing the aforementioned acts and/or omissions, each Defendant negligently breached said duty to use due care.

37. Def. Borough of Sayreville, Sayreville Police Dept., and Chief Zebrowski through its agents, servants and/or employees were negligent and otherwise reckless in that they failed to adequately train, supervise and properly control the Defs. Lt. John Dow 1, Ptl. Kilcomins, Ptl. John Dows 2 and 3 and did negligently hire or continued to employ the Defendants creating an atmosphere of lawlessness within which officers perpetuated a violation of civil rights.

38. Def. Borough of Sayreville, Sayreville Police Dept., failed to properly instruct and supervise their subordinate police officers and prevent the negligent acts of their subordinates when, they knew or reasonably should have known of such acts and had the authority and responsibility to prevent these acts.

39. Acting under the color of the law, Def. Borough of Sayreville, Sayreville Police dept. negligently failed to instruct, supervise control, and discipline on a continuing basis the Defendants as to their duty to refrain from: (a) unlawfully and maliciously harassing a citizen by displaying a pattern, practice and policy of discrimination and/or deliberate indifference to the civil rights of its citizens (b) unlawfully and maliciously arresting, detaining and confining a citizen in retaliation for filing complaints/lawsuits against fellow officers (c) and otherwise depriving Plaintiff of his constitutional and statutory rights, privileges, and immunities.

40. Def. Borough of Sayreville, Sayreville Police dept. and directly and indirectly under the color of the law, approved or ratified the unlawful 'deliberate, reckless, and wanton conduct of Chief Zebrowski and the other Defendants.

COUNT EIGHT - Negligent Hiring

41. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint

42. Def. Borough of Sayreville, Sayreville Police Dept. selected, hired, and retained defendants to perform work under the color of the law.
43. Def. Borough of Sayreville, Sayreville Police Dept. failed to exercise reasonable care and were negligent in selecting, hiring and retaining Def. Chief Zebrowski, Lt. John Dow 1, Ptl. Kilcomins, Ptl. John Dows 2 and 3 to perform work. At the time, Def. Borough of Sayreville/Sayreville Police Dept selected, hired or retained Defendants, and at all other relevant times,
44. Def. Borough of Sayreville/Sayreville Police Dept. knew or reasonably should have known that Defendants would violate Plaintiff civil and constitutional rights a) Chief Zebrowski who tempered with evidence and was named in a past lawsuit for misconduct and Plaintiff would suffer damages alleged herein. And that the officers have a history of filing false complaints without probable cause and retaliating against individuals who file complaints against them. Def. Borough of Sayreville and Sayreville Police Dept. conduct constitutes negligence and is actionable under the laws of the United States and New Jersey.

COUNT NINE - Respondent Superior

45. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint
46. Def., Lt. John Dow 1, Ptl. Kilcomins, Ptl. John Dows 2 and 3 were at all times herein acting within the scope of their employment, as employees of the Borough of Sayreville and Sayreville Police Department. While acting within their employment Defendants were negligent in their performance and/or failure to perform their duties.
47. Under Respondent Superior, the Defendants Borough of Sayreville and Chief Zebrowski are liable for the acts of, and injury caused by said officers.
48. Lt. John Dow 1 while supervising Ptl. Kilcomins, Ptl. John Dow 2 and 3 had a duty to protect Mr. Severino from the illegal detention and false charges which he did nothing to stop knowing that the events were illegal.

COUNT TEN - Abuse of Process

49. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint
50. That on June 17, 2012 Ptl. Kilcomins did abused the legal process and the trust of his badge by filing false criminal charges accusing plaintiff of driving while suspended.
51. Such charges were false and malicious and filed in retaliation and to intimidate the plaintiff over the law suit against the Borough of Sayreville and member of the Sayreville Police Dept. and complaints filed against these offices to the N.J. and U.S. attorney general offices.

COUNT ELEVEN - Violation of Civil Rights under N.J.S.A. 10:6-1

52. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint

53. Def. Borough of Sayreville and Sayreville Police Dept. through its agents servants and/or employees violated the civil rights of Mr. Severino under the New Jersey Civil Rights Act, N.J.S.A. 10:6-1 et seq. by falsely detaining him, filing false charges, and retaliating against him for exercising his first amendment rights to file grievances. Def. Chief Zebrowski, Lt. John Dow 1, Ptl. Kilcomins, Ptl. John Dows 2 and 3 for creating an atmosphere of lawlessness within which officers perpetuated a violation of civil rights based upon unlawful detention and confinement, discrimination/prejudice, deprivation of liberty, and others against the Plaintiff.
54. Plaintiff was unlawfully detained, charged, and verbally assaulted by members of the Sayreville Police Department inflicting psychological trauma, fear, and humiliation, all of which were done in the belief that such acts were justified by the Defendants' authority as police officers of the City Sayreville and otherwise under the color of the law.
55. Plaintiff alleges that such acts directed towards him were negligent and/or malicious and the acts were done in violation of Plaintiff's civil rights under the New Jersey Civil Rights Act, N.J.S.A. 10: 6-1 et. seq.

COUNT TWELVE - Intentional Infliction of Emotional Distress

56. Plaintiff re-alleges and incorporates herein paragraphs 1-60 of this Complaint
57. Defendants intentionally and deliberately inflicted emotional distress on Mr. Severino by outrageous and extreme display pattern, practice, and discrimination and deliberate indifference and by abusing the lawful process by unlawful purposes by violating his constitutional rights. Defendants' conduct was extreme and outrageous, beyond all possible bounds of decency.
58. At the time of the incidents alleged herein and before, Mr. Severino was emotionally and physically healthy, active, and fully capable of engaging in normal day-to-day activities. Since the time of the false detention, charges and verbal abuse and others. Mr. Severino's ability to perform and enjoy his usual activities, including family and work-related activities, has been impaired. In addition, Mr. Severino has suffered severe emotional distress and mental anguish affecting his psychological well-being.
59. Mr. Severino is entitled to compensation for the constitutional harms that the Defendants inflicted upon him.
60. **AS A DIRECT AND PROXIMATE RESULT** [common to all counts] of the wrongful acts of the Defendants jointly, severally and/or individually as listed in this complaint had a deliberate indifference and unlawful violation of Mr. Severino's rights, committed under the color of the law. Mr. Severino suffered and continues to suffer physical, psychological and emotional distress/anguish, anxiety, embarrassment, loss of freedom/liberty, property and employment/salary, and inconvenienced and is entitled to relief under 42 U.S.C. § 1983, The New Jersey Tort Claim Act and the Common Laws of New Jersey.

"DEMAND"

61. **Wherefore**, the Plaintiff demands judgment against the defendants for damages, together with interest and cost of suit.

A. Issue a declaratory judgment stating that:

1. Defendants Borough of Sayreville Chief Zebrowski, Lt. John Dow 1, Ptl. Kilcomins, Ptl. John Dows 2 and 3 did violate Mr. Severino's constitutional rights

B. Issue an injunction ordering the defendants to:

1. Remove the false ticket from Mr. Severino's DMV record
2. That the Borough Sayreville reevaluates the defendants' employment and
3. Order the defendants to stop retaliating, filing false charges against Mr. Severino
4. Order the reinstatement of Mr. Severino's driver's license

C. Award compensatory damages in the following amounts;

1. Lost Salary [to be determined at trial]
2. Reasonable expenses incurred in this litigation, including but not limited to attorney and expert fees

D. Award punitive Damages in the following amount

1. In the amount of 1 million dollars (1,000,000.00 dollars) collectively

E. Grant such other relief as it may appear that Plaintiff is entitled.

I hereby certify that the forgoing statements made by me are true and correct to the best of my knowledge and I'm aware that if any statement is willfully false Plaintiff is subject to fine and imprisonment.

Respectfully submitted,



William F. Severino III

Dated May 23, 2014

MIDDLESEX VICINAGE CIVIL DIVISION
P O BOX 2633
56 PATERSON STREET
NEW BRUNSWICK NJ 08903-2633

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 519-3728
COURT HOURS 8:30 AM - 4:30 PM

DATE: JUNE 18, 2014
RE: SEVERINO III WILLIAM VS BOROUGH OF SAYREVILLE
DOCKET: MID L -003697 14

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON DOUGLAS K. WOLFSON

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (732) 519-3745 EXT 3745.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

WILLIAM F. SEVERINO III
2 GUILFOYLE TERRACE
APARTMENT B2
SAYREVILLE NJ 08872

JUMMAR5

SUMMONS

Attorney(s) William Severino
 Office Address 2 Guilfoyle Terr
 Town, State, Zip Code Sayreville, NJ
08872
 Telephone Number [REDACTED]
 Attorney(s) for Plaintiff Pro-se

William Severino
 Plaintiff(s)

Vs.
Borough Sayreville et al.
 Defendant(s)

Superior Court of
 New Jersey

Middlesex COUNTY
Law DIVISION

Docket No: Mid-L-2001-14

CIVIL ACTION SUMMONS

APR 23 AM 8:53

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 available in the Civil Division Management Office in the county listed above and 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.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not 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 available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

W. Severino III
 Clerk of the Superior Court

DATED: July, 18, 2014
 Name of Defendant to Be Served: Borough of Sayreville / Mayor's office
 Address of Defendant to Be Served: 68 main St. Sayreville, NJ 08872

William F. Severino III
2 Guilfoyle Terr. B2
Sayreville, NJ 08872

RECEIVED AND FILED

2014 APR -2 A 9:56

ACCEPTED AT COUNTER
"UNDER REVIEW"
COPY GIVEN AT COUNTER (V)

WILLIAM F. SEVERINO III
CIVIL OFFICE
MIDDLESEX VICINAGE
PLAINTIFF,

v.

BOROUGH OF SAYREVILLE, CHIEF
ZEBROWSKI, PTL. JOHN DOW 1& 2
GLASSRATNER MANAGEMENT,

All in their official and individual capacities
DEFENDANTS,

SUPERIOR COURT OF NEW JERSEY
MIDDLESEX COUNTY
LAW DIVISION - CIVIL

Docket No. L-2001-14

**COMPLAINT
WITH JURY DEMAND**

"INTRODUCTION"

1. This is An action in which plaintiff seeks relief for violations of his property rights guaranteed under the United States and New Jersey Constitution and the common laws of the State of New Jersey seeking relief for the destruction and refusal of the return of his property by the defendants. Plaintiff is seeking monetary damages for the lost of property.

"JURISDICTION"

2. This Court has Jurisdiction over the subject matter under State and Federal Constitutional provisions and the common law of the State of New Jersey for property rights.
3. Venue in Middlesex County is proper all relevant events took place in Middlesex County and all parties are from Middlesex County.

"THE PARTIES"

4. Plaintiff, William F. Severino III is a citizen of the United States and resides in Middlesex County at 2 Guilfoyle Terr., Sayreville, NJ 08872
5. Defendant, Borough of Sayreville, is responsible for the training and supervision of Defendants, Borough of Sayreville has established or delegated to Def. Chief John Dow the responsibility for establishing and implementing policies, practices, procedures, and customs used by law enforcement officers employed by Borough of Sayreville.
6. Defendant, Chief Zebrowski was at all times material to the allegations in this Complaint, employed as the Chief of Police by the Sayreville Police Department and is responsible for the supervision and training of the Defendants, further, responsible for making and/or implementing policies and practices used by law enforcement officers.
7. Defendant Sgt. K Connors Ptl. Popowski, Ptl. Mader and Ptl. Teator is a citizens and resident of New Jersey and was at all times material to the allegations in this Complaint, acting in his

capacity as a Police Officer employed by the Borough of Sayreville and was acting under color of state law.

8. Defendants, Ptl. John Dow 1 and 2 are citizens and resident of New Jersey and was at all times material to the allegations in this Complaint, acting in his capacity as a Police Officer employed by the Borough of Sayreville and was acting under color of state law.
9. Defendant, GlassRatner Management and all its employees, sub-contractors ect. was at all times relevant herein the property management company responsible for maintaining Macarthur Manor property before and after hurricane sandy.

"FACTUAL BASIS COMMON TO ALL CLAIMS"

10. In April 2012 Mr. Severino moved back in with Mrs. Souders at 156B Macarthur ave., Sayreville, NJ 08872
11. On June 23, 2012 Mr. Severino was falsely arrested at 156B Macarthur ave. by Sgt. Connors, Ptl. Popowski, Ptl. Mader, and Ptl. Teator and advised the officers that he wanted his family to pick up his keys and move his truck which they refused to allow Mr. Severino a phone call to have this done.
12. Mr. Severino was incarcerated for 43 days which time he returned to 156B Macarthur Ave. Were Mr. Severino Found all his property from the back of his truck gone and was inside Ms. Souders apartment. (which she claim she did to keep it safe).
13. Ms. Souders broke into Mr. Severino's Jeep & removed his important personal property, all stuff Mr. Severino couldn't afford to loss if Ms. Souders had a Bi-Polar episode and kicked him out or accused him of false domestic violence again. [were there is a long history of which the Sayreville police know about] as well property that was in the apartment.
14. While still living there Mr. Severino was looking for a place where he could move his property and store it.
15. on September 26, 2012 Mr. Severino's parents agreed to allow him to move his property into their basement, and when he attempted to move his property out. Ms. Souders refused to allow him to do so and threatened to call the police.
16. Mr. Severino called the police for help to get his property (as well report the thief) out of the house, which Officers John Dow 1 and John Dow 2 refused indicating that they don't get involved with property matters and that I would have to go to civil court. Even though I told them she removed the property from my truck and did not have permission to due so while I was incarcerated.
17. On apx Oct. 1, 2012 Mr. Severino mailed a civil complaint requesting the court to order Ms. Souders to return his property.

18. On Oct. 22, 2012 Mr. Severino went to the Middlesex County Superior Court to file for an emergent hearing because Hurricane Sandy was coming and Ms. Souders apartment is in a flood zone. Only to get the run around from the clerks.
19. Mr. Severino also called the mayor's officer requesting assistance knowing that the property will be lost if I can't get it out of there.
20. Hurricane Sandy hit and in fact Mr. Severino lost his property because government officials allowed it to happen.
21. Mr. Severino then contacted GlassRatner requesting information on how I was able to get my property out of the apartment before they want in and begun to clean it out. Which they took my Name and Address and told me they'll be in contact with me.
22. a month later or more my sister (who lives down the street) told me that there are dumpsters there I then called again and was again given the run around and left my name and number.
23. Ms. Souders then contacted plaintiff via email asking how to file a civil suit and told plaintiff that they (glassratner) removed all the property from the basement and throw it all out into the dumpsters and their employees taking all Mr. Severino's valuables thereof.

"COMPLAINT"

COUNT ONE –General Allegations

24. Plaintiff re-alleges and incorporates herein paragraphs 1- 24 of this Complaint.
25. In committing the acts complained of herein, Defendants acted under the color of the law to deprive Plaintiff of certain constitutionally protected rights but not limited to: (a) Property Rights (b) Due Process (c) Failure to Implement Appropriate Policies, Customs and Practices, (d) Negligence and (e) Intentional Infliction of Emotional Distress
26. In violating Plaintiff's rights as set forth above and other rights to be proven at trial, Sayreville Defendants acted under the color of the law, deprived plaintiff of property without due process in violation of his constitutional and common law rights under the Fourteenth Amendment of the United States Constitution and the N.J.T.C.A.
27. Glassratner deprived plaintiff of property without due process in violation of his constitutional and common law rights under the Fourteenth Amendment of the United States Constitution and the landlord/tenant laws of New Jersey.
28. Defendants' acts were willful, wanton, malicious, oppressive and done with conscious disregard and deliberate indifference for Plaintiff's rights. Defendants' policies, practices, conduct and acts herein have resulted in irreparable injury to the Plaintiff.

COUNT TWO - Deprivation of Property

29. Plaintiff re-alleges and incorporates herein paragraphs 1-28 of this Complaint.

30. Mr. Severino asserts that he made every effort to protect his property from being destroyed in hurricane sandy then made every effort to obtain his property soon there after to salvage what ever property he may be able to save and recover.
31. Mr. Severino on said dates was a legal tenant of 156B Macarthur Ave.
32. All defendants collectively contributed to the lost of Mr. Severino's property as outline above Defendants, either with the specific intent to violate the Plaintiff's rights or with a reckless disregard of the probability of causing that violation, was so extreme and outrageous that it went beyond the bounds of decency It would be considered atrocious and utterly intolerable in a civilized community.
33. After Hurricane Sandy the def. Glassratner through their employees locked me out of the premises illegally. My requests for re-entry have not been successful. And because of there refusal they had their employees remove Mr. Severinos property which was in fact savable.
34. As a direct and proximate result of the defendants actions jointly, severally and/or individually as listed in this complaint had a deliberate indifference and unlawful violation of Mr. Severino's property rights. Mr. Severino suffered and continues to suffer, psychological and emotional distress/anguish, loss property and suffered economic lost and inconvenienced.

"DEMAND"

Wherefore, the Plaintiff demands judgment against the defendants for damages, together with interest and cost of suit.

A. Award compensatory damages in the following amounts;

- | | |
|---|--------------|
| 1. Economic Lost Salary | \$100,000.00 |
| 2. Lost property | \$30,000.00 |
| 3. Reasonable expenses incurred in this litigation, | |

B. Award punitive Damages in the following amount

1. In the amount of 1 million dollars (1,000,000.00 dollars) collectively

C. Grant such other relief as it may appear that Plaintiff is entitled.

I hereby certify that the forgoing statements made by me are true and correct to the best of my knowledge and I'm aware that if any statement is willfully false Plaintiff is subject to fine and imprisonment.

Respectfully submitted,

W Severino III

MIDDLESEX VICINAGE CIVIL DIVISION
P O BOX 2633
56 PATERSON STREET
NEW BRUNSWICK NJ 08903-2633

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 519-3728
COURT HOURS 8:30 AM - 4:30 PM

DATE: APRIL 03, 2014
RE: WILLIAM F SEVERINO VS BOROUGH OF SAYREVILLE
DOCKET: MID L -002001 14

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 1.

DISCOVERY IS 150 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON JOSEPH REA

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (732) 519-3728 EXT 3728.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

WILLIAM F. SEVERINO III
2 GUILFOYLE TERR
APARTMENT 2B
SAYREVILLE NJ 08872

JUMMAR5

UNITED STATES DISTRICT COURT

for the

District of New Jersey

WILLIAM F. SEVERINO, III

Plaintiff

v.

JESSICA OPERMAN, et al

Defendant

Civil Action No. 12-7843 MAS

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* BOROUGH OF SAYREVILLE

13 SEP 12 AM 11:29

RECEIVED RECEPTION CLERK

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

WILLIAM F. SEVERINO, III
2 GUILFOYLE TERRACE
SAYREVILLE, NJ 08872
PRO SE

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

WILLIAM T. WALSH

CLERK OF COURT

Date: 06/14/2013

Beth Gmial
Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

William F. Severino III

Plaintiff,

v.

Jessica Opperman, et al.
Defendants.

**ORDER ON APPLICATION
TO PROCEED WITHOUT
PREPAYMENT OF FEES**

Case Number: 12-7843 MAS/TJB

Having considered the application to proceed without prepayment of fees under 28 U.S.C. § 1915;

IT IS ORDERED that the application is:

☒ **GRANTED, and**

☒ **The Clerk is directed to file the complaint, and**

☒ **IT IS FURTHER ORDERED** that the clerk issue summons and the United States Marshal serve a copy of the complaint, summons and this order upon the defendant(s) as directed by the plaintiff. All costs of service shall be advanced by the United States.

☐ **DENIED, for the following reasons:**

☐ **and the Clerk is directed to close the file.**

Plaintiff may submit a filing fee of \$350.00 within 30 days from the date of this order to reopen this case.

ENTERED this 14th day of June, ~~2012~~ ²⁰¹³

Michael A. Shipp
Judge Michael A. Shipp, U.S.D.J.

William F. Severino III
2 Guilfoyle Terr.
Sayreville, NJ 08872


WILLIAM F. SEVERINO III
PLAINTIFF,

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
VINTAGE OF NEWARK

v.

Docket # _____

JESSICA OPPERMAN, MARY NELSON
JOHN DOW I, PTL.GUMPRECHT
BOROUGH OF SAYREVILLE,

In their official and individually capacities

CIVIL COMPLAINT

DEFENDANT,

"STATEMENT OF FACTS"

1. This is An action in which plaintiff seeks relief for violations of rights guaranteed under the laws and the Constitution of the United States and New Jersey and the common law of the State of New Jersey, seeking relief for malicious prosecution, Right to file complaints & prosecute, neglect, deliberate indifferent to plaintiff's constitutional rights and retaliatory actions.
2. Plaintiff is seeking injunction relief and monetary damages.

"JURISDICTION"

3. This action arises under the First, Second, Fourth, Fourteenth Amendments to the United States Constitution, 42 U.S.C. sec. 1983, and the common law of the State of New Jersey.
4. This Court has Jurisdiction over the subject matter of this law suit pursuant to 28 U.S.C. sec. 1331, 1343 (3) and 1367
5. Venue in the District of New Jersey is proper Plaintiff resides in the District of New Jersey and all events relevant to this action occurred in the District of New Jersey.

"THE PARTIES"

6. Plaintiff, William F. Severino III is a citizen of the United States and resides in Middlesex County, 2 Guilfoyle Terr., Sayreville, NJ 08872

7. Defendant, Mary Nelson was at all times relevant herein the Prosecutor of the Middlesex County Prosecutor Office and responsible for establishing and ensuring compliance with procedures and checking alibis.
8. Defendant, Jessica Opperman was at all times relevant herein the Prosecutor of the Middlesex County Prosecutor Office and responsible for establishing and ensuring compliance with procedures and checking alibis.
9. Defendant, John Dow 1 (solaman ?) was at all times relevant herein the Prosecutor of the Middlesex County Prosecutor Office and responsible for establishing and ensuring compliance with procedures and checking alibis.
10. Defendant, Borough of Sayreville, was at all times responsible for all officers, employees and agents under it's supervision and control and for establishing and ensuring compliance with procedures and State law in the Borough of Sayreville
11. Defendant, Ptl. Gumprecht was at all times relevant herein a police officer at the Sayreville police dept. and was responsible for investigating criminal complaints and up holding the laws of the State of New Jersey.

Malicious Prosecution

12. Ptl. Gumprecht maliciously and without probable cause commenced an action against the plaintiff in the Sayreville Municipal Court, upon a complaint in which he falsely alleged that plaintiff had on February 25, 2010 committed the act of criminal mischief, thief, and burgerly.
13. Ptl. Gumprecht made an affidavit in which he falsely and maliciously arrived that this plaintiff did on February 25, 2010 committed the crimes of burgerly, thief, and criminal mischief.
14. he then presented the affidavit to the honorable Judge Weber. The Judge of Sayreville Municipal Court and demanded thereon an order for the arrest of this plaintiff.
15. By said affidavit it was falsely made to appear that a sufficient cause of action existed for an order for the arrest of this plaintiff therein; and there upon the said Judge issued an order for the arrest of this plaintiff in said action, and holding him to bail in the sum of 50,000.00 dollars cash only.
16. The plaintiff during arraignment told Judge Spencer Robbins his alibi and requested an order to preserve evidence, which was denied.
17. That on February 25, 2010 the plaintiff was taken from the township of Sayreville where he resides to the Middlesex County Jail against his will by members of the Sayreville police department.

18. On March 1st 2010 plaintiff wrote to the Middlesex Prosecutor's office, Office of the public defender, and Judge Devesa SCPJ. Telling all parties of plaintiff's alibi and the security tape.
19. At the third grand jury Mary Nelson and Jessica Opperman requested an superseding indictment based on no evidence, and refused to tell the jury that there was a security tape that showed plaintiff at a bar from 10 pm to 2 am and couldn't commit the crime at 12:01 am. And never investigated plaintiff's alibi prior to the indictment
20. At this time John Dow 1 took the case over and had no clue what he was doing further plaintiff had turned down all plea offers and demanded trial.
21. Plaintiff after showing that he would provide at trial, plaintiff was released on ROR after spending 89 days in the county Jail for a crime he did not commit and the defendants refused to look into plaintiff's alibi.
22. At a trial on December 14, 2010 the 4th Middlesex County Prosecutor upon motion ~~dismiss the indictment because the crime alleged never took place.~~ The plaintiff was found to be not guilty, and the case was therefore determined finally in the plaintiff's favor.
23. The prosecution was commenced and instituted by the defendants without basis, and was done maliciously and with intent to harm the plaintiff.
24. As a result, the plaintiff was deprived of his personal liberty in violation of United States Constitution Amendment Fourth and Fourteenth, the common laws of the State of New Jersey, suffered great pain and anguish of the mind and has suffered in his business and reputation and was humiliated. Plaintiff lost custody of his child and had his parental rights terminated do to this false arrest under the domestic violence act.

"DEMAND"

25. Wherefore the plaintiff demands judgment against the defendants for damages, together with interest and cost of suit.

A. Issue a declaratory judgment stating that:

1. Defendants violated plaintiffs due process rights under the fourteenth amendment by refusing to investigate his alibi prior to indicting him.
2. The defendant's malicious prosecution of the plaintiff violated the plaintiff's Fourth Amendment rights under the United States Constitution.
3. The Borough of Sayreville policy on domestic violence is gender discriminatory in violation of the fourteenth amendment of the United States Constitution and the common laws of the state of New Jersey.

B. Issue an injunction ordering the defendants to:

1. Immediately arrange the arrest and prosecution of Christy Souders who made up the false allegations in order to prevent plaintiff from getting custody of his daughter.
2. Immediately return William Severino Jr. Guns that were illegally confiscated from him. By Mary Nelson
3. Expunge the criminal charges that were falsely filed against the plaintiff by the Sayreville police department and/or indictment by the prosecutors

C. Award compensatory damages in the following amounts;

1. Lost work 16,020
2. Attorney fees 1,500
3. Lost property 5,000

D. Award punitive Damages in the following amount

1. 5.5 Million dollars collectively

E. Grant such other relief as it may appear that plaintiff is entitled.

I hereby certify that the forgoing statements made by me are true and correct to the best of my knowledge and I'm aware that if any statement is willfully false Plaintiff is subject to fine and imprisonment.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read 'W Severino III', is written over a horizontal line.

Dated November 20, 2012

William F. Severino III

Other Documents3:13-cv-01610-JAP-TJBPRATHER v. SGT. BUNDY et al

NO16,PROSE-PR,PS1

U.S. District Court**District of New Jersey [LIVE]****Notice of Electronic Filing**

The following transaction was entered on 6/14/2013 at 3:25 PM EDT and filed on 6/14/2013

Case Name: PRATHER v. SGT. BUNDY et al**Case Number:** 3:13-cv-01610-JAP-TJB**Filer:** REGINALD PRATHER**Document Number:** 26**Docket Text:**

Addendum to Point Three of Plaintiff's [24] Cross-Motion, by REGINALD PRATHER.
(Attachments: # (1) Certificate of Service, # (2) Cover Letter)(mmh)

3:13-cv-01610-JAP-TJB Notice has been electronically mailed to:

LUCY ELIZABETH FRITZ lucy.fritz@dol.lps.state.nj.us

3:13-cv-01610-JAP-TJB Notice will not be electronically mailed to::

REGINALD PRATHER
67155/132001A
W/C - 6 LEFT/34 CELL/FLATS
NEW JERSEY STATE PRISON
PO BOX 861
TRENTON, NJ 08625

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1046708974 [Date=6/14/2013] [FileNumber=6804503-0]
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Document description:Certificate of Service

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1046708974 [Date=6/14/2013] [FileNumber=6804503-1]

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Document description: Cover Letter

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1046708974 [Date=6/14/2013] [FileNumber=6804503-2

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