

UNITED STATES DISTRICT COURT
CLERK, U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
RECEIVED

2013 MAR 27 AM 9 29

Drew Bradford, Plaintiff

Civil Action No.

v.

COMPLAINT

Joe Bolles

Mary Braunschweiger

Eugene Farkas

Trial Court Administration located

in Somerset County

Somerset County Government

Glenn Grant

Meryle Nadler

Andrew Bartolotti

Police Department located in Summit,

New Jersey

Government of Summit, New Jersey

City of Summit, New Jersey 07901,

07901 is the postal zip code

for both the Government of

Summit, New Jersey and for the

City of Summit, New Jersey.

Patrice Rindok,

Administrative Office of the Courts,

Defendants

PARTIES

Plaintiff

Drew Bradford
31 Parkside Road
Bedminster, N.J.
07921
Tele; 908-781-8852

Defendants

Trial Court Administration
40 North Bridge Street
Somerville, New Jersey
008876

Eugene Farkas, Trial Court Administrator
40 North Bridge Street
Somerville, New Jersey
08876

Mary Braunschweiger, Civil Division Manager
40 North Bridge Street
Somerville, New Jersey
08876

Joe Bolles, Assistant Civil Division Manager
40 North Bridge Street
Somerville, New Jersey
08876

Patrice Rindok, Team Leader
40 North Bridge Street
Somerville, New Jersey
08876

Somerset County Government
(Office of the Freeholders)
20 Grove Street
Somerville, New Jersey
08876

Administrative Office of the Courts
Richard J. Hughes Justice Complex
P.O. Box 037
Trenton, New Jersey
08625

Glenn Grant, Acting Administrative Director of the Courts
Administrative Office of the Courts
Richard J. Hughes Justice Complex
P.O. Box 037
Trenton, New Jersey
08625

Meryl Nadler,
lawyer to the Administrative Director of the Courts
Richard J. Hughes Justice Complex
P.O. Box 037
Trenton, New Jersey
08625

City of Summit, New Jersey
512 Springfield Avenue
Summit, New Jersey
07901

Government of Summit, New Jersey
512 Springfield Avenue
Summit, New Jersey
07901

Police Department of Summit, New Jersey
512 Springfield Avenue
Summit, New Jersey
07901

Captain Andrew Bartolotti
Police Department, 512 Springfield Avenue
Summit, New Jersey
07901

Deputy Chief W. Paul Kelly, Head of Internal Affairs
Police Department, 512 Springfield Avenue
Summit, New Jersey
07901

Captain Steve Zagorski Head of Internal Affairs
Police Department, 512 Springfield Avenue
Summit, New Jersey
07901

JURISDICTION

Defendants have lied to the County Prosecutor to falsely imprison and arrest Plaintiff. To cover this up and to prevent the litigation by the Plaintiff for this wrongful imprisonment, the defendants have destroyed significant evidences which were under oath and on the original computer server disc. They have destroyed Court key evidences to be utilized in the litigation against some of the defendants.

Defendants have also made hostile anti-Heavenly Father and anti-Jesus Christ statement regarding Plaintiff's litigations in which Plaintiff has protected children, minorities, the public and students.

They have also ejected Plaintiff from the Courthouse with false information told to the Sherriff's department. The Chief of the Sherriff's department has provided a statement verifying that the information supplied to the Sherriff's department to eject the Plaintiff was "tainted."

Defendants have refused to provide plaintiff with public information related to his litigations, claiming falsely that the plaintiff is a "group."

Without any hearing and without the plaintiff being afforded any opportunity to defend himself, the defendants have denied plaintiff his Constitutional rights to litigate and to communicate with the court and its administration.

At the same time in which defendant was doing his anti-Heavenly Father anti-Jesus Christ statement, the same defendant said that Plaintiff should lose his summary judgement opposition and thus lose the case. This same defendant at that same time, then lied by omission to the trial judge concerning administrative adjournments and that Plaintiff's papers were not submitted on time (which they were) thus causing a dismissal of this case with defendant's hostile anti Heavenly Father and Jesus Christ statement surrounding this harm to plaintiff.

Without any hearing nor any due process nor any opportunity for the plaintiff to defend himself, the defendants have made null and void any and all communications by the plaintiff with the court. Plaintiff is not permitted to telephone, nor to be in the Court (except for scheduled appearance) and plaintiff is not permitted to write to the Court, except to only one of the defendants so harming the plaintiff. Moreover, this sole person to whom only the plaintiff can write, refuses to acknowledge if the Judge receives the plaintiff's papers. The Judges clerk telephones plaintiff that 2 sets of Motion papers were not received by the Judge. This was discovered by accident when the Judge's clerk telephoned plaintiff to determine if plaintiff wanted oral argument.

All of the aforementioned denies plaintiff his right to

litigate with equal access and with equal protection as to his rights as guaranteed by Section 1 of the Fourteenth Amendment of the Constitution of the United States of America.

By the excessive, improper and without evidence overly burdensome restrictions committed against the plaintiff by the the defendants, the plaintiff is also denied by the defendants his United States of America Constitutional rights of:

Freedom of speech as contained within the First Amendment;

Freedom of religion as contained within the First Amendment;

Freedom of the people to peaceable assemble as contained within

the First Amendment (The Plaintiff, his paralegal and witnesses can not meet in the Courthouse nor in any courthouse of adjacent counties as so restricted by the defendants);

Liberty and property as provided in the Fifth Amendment of the

Constitution of the United States of America (since the litigations and the property protected or compensated within these litigations is destroyed by the defendants); without any due process of law);

Liberty and property as provided in the Fifth Amendment of the

Constitution of the United States of America (since the significant evidences within plaintiff's two litigations is destroyed by the defendants without any due process of law);

The malicious prosecution committed by the defendants against the plaintiff which placed plaintiff in three jails deprived plaintiff of his liberty as protected by the Fourteenth Amendment in Section 1. This also deprived plaintiff of the equal protection of the laws as provided in Section 1 of the Fourteenth Amendment. These protections are in the United States Constitution.

This malicious prosecution also took property from the plaintiff of \$995.60 This violates Section 1 of the Fourteenth Amendment of the United States of America Constitution by depriving plaintiff of his property without due process.

Please note that the defendants lied to commit these malicious prosecutions. When the arresting officer Bartolotti admitted under oath that he arrested Drew Bradford because he did not take a class vote and then admitted under oath that there is no such law to take a class vote, the defendants destroyed the record of this under oath testimony.

All of this malicious prosecution was committed against the plaintiff without due process of law as provided within the Fifth and the Fourteenth Amendments (Section 1) of the Constitution of the United States of America.

This targeting and malicious prosecution against the Plaintiff as committed by the defendants also violates 42 U.S.C. Section 1983, specifically depriving the plaintiff of his United States Constitutional rights of due process and

of equal protection under the law.

The defendants' conspiring with malicious prosecution and with the destruction of significant Court evidences, related to that malicious prosecution, violate 42 U.S.C. Section 1985 in the violation of Civil rights and liberties guaranted by the United States Constituion.

The defendants conspiring to deny to the plaintiff his communication and equal rights to litigate, once plaintiff reported the destruction of these key Court evidences also violâtes 42 U.S. C. Section 1985 in the violation of Civil rights and liberties guarantedd by the United States Consti-tution to the plaintiff.

CAUSE OF ACTION

1. Civil Court administrators have destroyed significant evidences upon which Plaintiff had given Notice to Captain Andrew Bartolotti, the Summit Police Department and the city of Summit for Andrew Bartolotti's intentional lying to place Plaintiff under false arrest, to steal Plaintiff's funds, to which Plaintiff was trying to utilize to save a throat cancer patient. Captain Bartolotti testified under oath that he "arrested Drew Bradford and there is no such law." There are two witnesses to this, one of which is a paralegal. These civil Court administrators are in Somerset County, New Jersey. This destruction of this significant evidence occurred sometime between late April of 2011 and June of 2012.

For accuracy, Bartolotti testified that he "arrested Drew Bradford because he did not take a class vote." Drew Bradford then asked officer Bartolotti, "What law says that I have to take a class vote?" Officer Bartolotti responded, "There is no such law."

This is the precise evidence which Somerset County administrators destroyed.

2. Somerset County administors destroyed another key evidence. The defendant in the Drew bradford v. Dianne Gleason case, admitted under oath that she "withdrew \$1,425 on a zero balance".

with the trial Judge, as a direct result, immediately strongly scolding the defendant with the trial; Judge being elevated from her chair, saying to the defendant, "You withdrew \$1,425 on a zero balance?" At that time (late April 2011) there was to be another trial including this issue. These afore-mentioned testimonies are destroyed from the original computer discs. This is the same method, destruction of testimonies from the original computer disc which occurred in the first paragraph of this CAUSE OF ACTION. This destruction of key evidence occurred between late April of 2011 and the end of October 2011.

There are two witnesses to this, one of which is a paralegal.

3. Upon reporting this tampering with the testimony stated in paragraph #2 in this CAUSE OF ACTION, administrator Joe Bolles who has been severely harassing Plaintiff for years, lied to his trial Court administrator, falsely claiming Plaintiff left voluntary numerous voice mails throughout the civil division. In Truth, Plaintiff followed Joe Bolles written instructions to him and left "court related" appropriate voice mail. Plaintiff has a copy of Joe Bolles written instruction to him and also a tape-recording of the very appropriate voice mail. Plaintiff also has a witness as to the voice mails left.

4. Without any hearing at all, Joe Bolles supervisor, Eugene Farkes, writes to Drew Bradford that he is banned from all telephone usage communications throughout Somerset, Warren and Hunter-

don counties in all of those additional court systems.

Eugene Farkas wrote this overwhelming telephone denials to Plaintiff dated Feb. 2, 2011.

5. With witnesses including the Chief of the Sherriff's department, which polices the Somerset County Court system, and a paralegal and Plaintiff, plus a tape recording of Joe Bolles harassing Plaintiff for 1 hour and approximately 40 minutes subsequent to surgery and with evidences of other harassments by Somerset Court administrators, Plaintiff wrote for assistance from the Acting Administrative Director of the Courts, Glenn Grant.

6. On April 3, 2012, Eugene Farkas states directly to the Plaintiff that he "has no direct knowledge nor evidenc that you (Drew Bradford) did anything wrong. As far as he knows you (Drew Bradford) did nothing wrong."

7. On April 3, 2012, Joe Bolles blames all of the harms in paragrpahs 3 and 4 above on Eugene Farkas, saying, "He's the one doing it (pointing to Eugene Farkas' office), not me. Go see him."

8. Lawyer Meryl Nadler lies and covers up these harms. On April 11, 2011, she falsely writes, "your propensity for showing up unannounced at the offices of various court personnel for no appatent case-related reasons." This is a baseless lie, written

to cover up the improper actions of her subordinates in administration.

As a Bible preacher exposing corruption (Ephesians 5:110 and protecting children, minorities, students, and the public successfully in the Law Division Superior Courts for over 20 years, Plaintiff has encountered wonderful Judges and law clerks. Plaintiff has a witness paralegal and a record of success (which the credit goes to our heavenly Father and to Jesus Christ).

There is not one shred of evidence to support this lie of Meryl Nadler.

Without a hearing or evidence, Meryl Nadler orders Plaintiff from written, in person, and telephone communications within Somerset and other counties.

9. Such improper violations of our way of life, liberty and our Court system being a refuge for Justice and Truth, occur subsequent to plaintiff reporting destruction of evidences and improper behavior by an administrator.

10. They also occurred after Joe Bolles did an anti-Church, an anti-Heavenly Father and Jesus Christ remark to me.

Joe Bolles commented to Plaintiff that Drew just defeated a doctor in Court. I stated that Heavenly Father and Jesus Christ accomplished this victory as they accomplished other Court victories in having me protect children, minorities, students and the public. Joe Bolles immediately replied that Heavenly Father

and Jesus Christ had nothing to do with any of that.

Joe Bolles stated this in a hostile tone directed against Drew Bradford. He did this during approximately November/December of 2011.

In addition to the destruction of key evidences, Joe Bolles has this religious animosity vocalized against Drew Bradford. No one else, no Judge nor law clerk nor anyone has vocalized negating Heavenly Father and Jesus Christ to these litigations except Joe Bolles.

11. After committing this religious vocal infraction against Drew Bradford, Joe Bolles lied to the Superior Court Judge, claiming an April 4, 2010 adjournment by Drew Bradford and lying by omission that Drew Bradford's Supreme Court Notice for Petition was not yet received by the Supreme Court, while he fully well knew that Drew Bradford's Notice of Petition was likely delayed, as others are, due to security x-ray at various Court buildings. His lies caused this Drew Bradford v. Dianne Gleason case to be Dismissed.

During summary judgement, in which Plaintiff prevailed, Joe Bolles stated to Plaintiff that he (Drew Bradford) should lose this summary judgement. His lies and hostility eventually caused the loss of this case. Joe Bolles then lies to ban plaintiff from the court after plaintiff reported tampering with key court evidence. The administrators with access to these key evidences are Joe Bolles and Mary Braunschweiger and Eugene

Farkas.

12. Mary Braunschweiger wrote on April 18, 2006 that Drew Bradford can not telephone the Court for no legitimate reason.

13. Eugene Farkas on June 9, 2006 falsely accused plaintiff bf being a "group" and refused Drew Bradford public information falsely claiming that Drew Bradford is a "group."

14. Eugene Farkas denied Drew Bradford all telephone communications to the court for no legitimate reason, 6/19/06, refusing to provide a reason for this, libeling plaintiff.

15. Chief Ken Bird of the Sherriff's department who polices the Somerset County Court system has provided a statement that administration clerk Patrice Rindok committed "tainted information to his police department, causing Drew Bradford to have the police remove Drew Bradford from the Court building, based upon that "tainted information."

Chief Ken Bird provided this statement on June 23, 2004.
16. Patrice Rindok caused this improper removal fo Drew Bradford from the Somerset County Courthouse shortly before Chief Ken Bird provided his statement exposing this misconduct against Drew Bradford committed by Patric Rindok.

16. At the heart of this is the fact that Drew bradford was exposing corruption in Somerset County. The Bedminster police were ordered by the Mayor and City Counsel to do writtne daily logs due to the corruption which Drew Bradford reported.

17. Corrupt acting governor Don DiFrancesco was losing this corruption case while representing the Bedminster police. His lawyer Tim Beck struck Drew Bradford from the rear. Tim Beck and Don Di Francesco set Drew Bradford up with two false criminal charges which were dismissed by the Somerset County Prosecutor.

The lying witness involved received a significant promotion.

Similarly, Don Di Francesco and Tim Beck were the lawyers for Summit government when private Andrew Bartolotti lied to the county prosecutor to be able to throw Drew Bradford in three jails and to steal his funds. Similarly, the county prosecutor dismissed this false felony charge and similarly Andrew Bartolotti was significantly promoted to Captain, receiving two promotions in 1 year. Captain Steve Zagorski & Deputy Chief W. Paul Kelly refused to investigate this malicious prosecution, evidence removal and recordings.

18. Don Di Francesco and his associates have much political influence in Somerset County

19. Thus, retaliation for exposure of corruption, religious discrimination, and reporting the destruction of key evidences, along with possible anger for having to deal with a Disabled plaintiff Drew Bradford, are motives generating the significant harms against Drew Bradford's Constitutional rights to free speech, access to the courts, religious freedom, equal treatment in litigation, due process, and truth from the administration before an Honorable Judge, and the destruction of valuable evidences in the custody of the administration.

20. Drew Bradford has always conducted himself as a true gentleman in the Courts. The Court will hear this when the recording of the "court related" and "most polite" voice mail was left with Joe Bolles.

First of all, Heavenly Father and Jesus Christ command us to do Good. Moreover, there is no advantage in not behaving as a true gentleman at all times everywhere.

In fact, it is Joe Boles who telephoned Drew Bradford for 1 hour and approximately 40 minutes, repeating the same question over and over because Drew Bradford gave the proper answer to Joe Bolles, and Joe Bolles was seeking the improper answer to the exact same repeated question. It is Joe Bolles who was improper and voluminous on the telephone.

21. It is Joe Bolles and other administrators who deny without any true reason, the Constitutional rights guaranteed by the Constitution of the United States to Drew Bradford, enumerated in #19 of this CAUSE OF ACTION. Their harmful action began years ago and have culminated in the destruction of key evidences by one or more administrators and in the falsehoods perpetrated against plaintiff to deny him due process and access and proper communications with the court.

For example, no one has ever accused Drew Bradford of writing anything at all improper to the court in any way. Yet, the defendant administrators Meryl Nadler and Glenn Grant prohibit Drew Bradford writing to 3 county court systems for

no reason.

Plaintiff is only permitted to write to Mary Braunschweiger who refuses to acknowledge whether or not she is forwarding such correspondences to the proper Court Judge. This is a further violation of Drew Bradford's rights. Defendant Mary Braunschweiger continues to commit this infraction from June 18, 2012 to the present, expanding the harms committed against the plaintiff.

Plaintiff is improperly forbidden his due process, presence, and all communications in the court system, allowed only to write to one person (a defendant who has already falsely harmed plaintiff) who refuses to acknowledge the delivery of communications from the plaintiff to the appropriate Judge. with one law clerk telephoning plaintiff complaining of 2 sets of missing motion papers which were eventually found to be kept from the Judge by the administration.

22. Without due process or any hearing or any opportunity for the Plaintiff to defend himself from the falsehoods of Joe Bolles, the plaintiff is also forbidden to telephone the telephone the Administrative Office of the Courts. Plaintiff, for years, telephoned the Administrative office of the Courts to ask administrative procedural questions. In fact, he received a lovely letter from the former Director of the Office of the Administration of the Courts indicating a good relationship between Drew Bradford and that agency. Plaintiff still has this letter in his possession. it is signed by Richard J.

Williams, Administrative Director of the Courts, J.A.D.

This agency was very kind and proper with Drew Bradford. They answered procedural and administrative questions and mailed to Plaintiff appropriate forms for summons and subpoenas. This is all being denied against the plaintiff without any due process nor hearing nor any legitimate reason. Plaintiff reported the destruction of key evidence, Administrator Joe Bolles who at that same time regarding the litigations of Drew Bradford committed hostile anti-religious statement and had said that Drew Bradford should lose the Drew Bradford v. Dainne Gleason Summary Judgement, then lies about Plaintiff, falsely claiming I left voluminous numerous voice mail for weeks, which is totally false. Then I am without any due process denied my equal and legitimate access, assistance, and communications with the Courts in 3 counties and at the Administrative Office of the Courts.

After reporting destruction of key evidence and after a anti-religious statement is committed against Plaintiff regarding his litigations, the Plaintiff is basically ousted from the Court system and denied his United State Constitutional rights to litigate on an equal basis with due process.

23. Please also note that during the Spring of 2005, plaintiff was on one leg after surgery and was instructed to enter the Somerset County Court through the back door. No one ever

notified the Court police, who have been excellent with me.

I collapsed and had to crawl around the Courthouse to gain entry.

This instruction to use the back door of the Somerset County Courthouse came from an administrator.

24. During June of 2003, plaintiff had been rear ended by a car while stopped at a red light. The other car driver was ticketed and plead guilty in Court. Plaintiff was severely suffering from pericardial contusions and the cardiologist wrote to the Court to excuse plaintiff for one month..

Based upon information and belief, an administrator never notified the Court and plaintiff was instructed by an administrator to come to court the next day. Plaintiff collapsed in Court and had to be ambulated to the emergency room.

25.. One or a combination of administrators, Joe Bolles, Mary Braunschweiger, and Eugene Farkas, allowed the original computer server disc to be tampered and the significant evidences aforementioned to be destroyed.

Subsequent to Plaintiff reporting this serious corruption, he was denied with^{out} any due process his access and communications to litigate within Somerset and two additional counties and to telephone the Administrative Office of the Courts.

Plaintiff was also libeled in this same regard by written correspondence to numerous court officials including Superior Court Judges.

26. Based upon information and belief, Andrew Bartolotti requested that his under oath Court testimony be destroyed in which he stated that he arrested Drew Bradford and that there was no such law by which to arrest him.

DEMAND

FIRST COUNT

(Deprivation of Freedom of Speech)

27. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause Of Action and contained in his Jurisdiction statements as if set forth herein.

28. Accordingly, defendants have violated plaintiff's rights to Freedom of Speech as guaranteed to him in the Constitutions of the United States of America and the State of New Jersey.

29. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

SECOND COUNT

(Deprivation of Freedom of Religion)

30. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

31. Accordingly, defendants have violated plaintiff's rights to Freedom of Religion as guaranteed to him in the Constitutions of the United States of America & the State of New Jersey.

32. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

THIRD COUNT

(Deprivation of Due Process)

33. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

34. Accordingly, defendants have violated plaintiff's rights to Due Process as guaranteed to him in the Constitution of the United States of America & the State of New Jersey Constitution.

35. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

FOURTH COUNT

(Breach of Contract)

36. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

37. Accordingly, defendants have violated plaintiff's rights by breaching the contractual offer which they made with the plaintiff and which he accepted by bringin his litigations to Somerset County.

On the wall of the Courthouse of Somerset County and distributed/by ^{to Drew Bradford} the administrators in the Courthouse in Somerset County are the following promises made to plaintiff Drew Bradford which were broken by the defendants:

"They will:prov

Provide equal access to a fair and effective system of Justice.

Provide quality service that continually improves, that meets and exceeds public expectations, and that ensures that all are treated with courtesy, dignity, and respect.

Earn the respect and confidence of an informed public."

38. Wherefore, plaintiff requests Judgement agasinst defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

FIFTH COUNT

LIBEL

39. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

40. Accordingly, defendants have libeled plaintiff.

41. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

SIXTH COUNT

FRAUD

42. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

43. Accordingly, defendants committed Fraud against plaintiff. Joe Bolles falsely instructed and mislead plaintiff intentionally to follow certain telephone communication. Plaintiff followed Joe Bolles' instructions regarding telephone communications and Joe Bolles distorted exaggerated and was false against plaintiff to set plaintiff up with burdensome and vicious restrictions to hinder his rights to litigate and to cause plaintiff to lose the Drew Bradford v. Doanne Gleason case which Joe Boles said the plaintiff should lose. Due to the intentional misrepresentations committed by Joe Bolles, the plaintiff lost his rights to communicate with the Court in three counties, and he also lost his rights to be present in court except for scheduled appearance. Plaintiff has hand-delivered Court papers to the Courts in four Counties for approximately 20 years with never a complaint, and in fact, with love and respect from administrators, Judges and law clerks. Due to the fraud of Joe Bolles, plaintiff can not even deliver Court documents.

44. Wherefore, plaintiff requests Judgement against defendants

for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

SEVENTH COUNT

§ 7 (Intentional Infliction of Emotional Distress)

45. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

46. Accordingly, defendants committed the Intentional Infliction of Emotional Distress against the plaintiff.

47. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

EIGHT COUNT

(Negligent InFliction of Emotional Distress)

48. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

49. Accordingly, defendants committed the Negligent InFliction of Emotional Distress against the plaintiff.

50. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

NINTH COUNT

(ConspiraCY)

51. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

52. Accordingly, defendants committed conspiracy against the plaintiff, depriving plaintiff of his Constitutional rights as guaranteed by the Constitutions of the United States of America and of the State of New Jersey and in the destructions of signifciant Court evidences and to harass and falsely imprison plaintiff and steal his \$995.60 profit from a reunion.

53. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, anf costs of suit.

TENTH COUNT

(Deprivation of Equal Protection)

54. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

55. Accordingly, defendants denied plaintiff of his Equal Protection as guaranteed him by the Constitutions of the United States of America and of the State of New Jersey.

56. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

ELEVENTH COUNT

(Deprivation of the Right to Assemble)

57. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

58. Accordingly denied plaintiff and a paralegal the right to Assemble as guaranteed to him in the Constitution of the United States of America. Naturally the plaintiff refers to the Right of the "people to peaceable assembly."

59. Wherefore, plaintiff requests Judgment against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

TWELFTH COUNT

(42 U.S.C. Section 1983)

60. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

61. Accordingly, defendants violated ~~42 U.S.C. Section 1983~~ regarding the plaintiff, specifically depriving plaintiff of his Federal and New Jersey State Constitutional rights, specifically freedom of Speech, freedom of Religion, Due Process, and Equal Protection under the Law.

Defendants also violated 42 U.S. C. Section 1983 by their Malicious Prosecution and Conspiracy against Plaintiff. All these violations in #61 were done under the color of statute and regulation.

62. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

THIRTEENTH COUNT

(42 U.S.C. Section 1985)

63. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

64. Accordingly, defendants violated U.S.C. Section 1985 regarding the plaintiff. Defendants conspired to intimidate the plaintiff from attending Court. Defendants conspired to influence the verdict by falsification to the Judge and by the destructions of significant under oath testimonies from the Court record, and by depriving plaintiff of due process and of communications with the Court.

Thereby, the defendants conspired for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of Justice with the intent to deny plaintiff the equal protection of the laws and the Constitutions of the United States of America and of the State of New Jersey.

65. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

FOURTEENTH COUNT

(Malicious Prosecution)

66. Plaintiff repeats and restates each and every statement contained in paragraphs 1 through 26 of plaintiff's Cause of Action and contained in his Jurisdiction statements as if set forth herein.

67. Accordingly, defendants committed Malicious Prosecution against the plaintiff. Defendants committed the destruction of significant afore-mentioned evidences to cover-up their Malicious Prosecution against the plaintiff.

68. Wherefore, plaintiff requests Judgement against defendants for actual damages, compensatory damages, consequential damages, punitive damages, interest, and costs of suit.

Please note: In addition to the damages, requested in Counts 1 through 14 of this Civil Action, plaintiff requests that his rights be restored to the Superior Courts in Somerset, Hunterdon, and Warren Counties, and plaintiff requests a Court Order during Discovery in this civil action to enable the back up recording and the original computer server disc be examined by plaintiff's expert witness to verify the tamperings with the testimonies of police officer Andrew Bartolotti and with defendant Dianne Gleason. Andrew Bartolotti did his testimony on April 20, 2011 at Somerset County Court. Dianne Gleason did her testimony on April 19 and 20, 2011 at the Somerset County Court.

PLAINTIFF, DREW BRADFORD, IS REQUESTING A BENCH TRIAL
BY THE HONORABLE FEDERAL JUDGE ASSIGNED TO THIS CIVIL ACTION.

Respectfully submitted,

Dated: March 25, 2013

A handwritten signature in cursive script that reads "Drew Bradford". The signature is written in black ink and is positioned above the printed name.

Drew Bradford

JS 44 (Rev. 12/07; NJ 5/08)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Bradford, Drew, M.

(b) County of Residence of First Listed Plaintiff Somerset

(c) Attorney's (Firm Name, Address, Telephone Number and Email Address)

Plaintiff, Drew Bradford, due to cost of litigation is representing himself.

DEFENDANTS

Please see the Defendants List in Parties of this Civil Action.

County of Residence of First Listed Defendant _____

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known) _____

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business in This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business in Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury PERSONAL INJURY ☐ 362 Personal Injury - Med. Malpractice ☐ 365 Personal Injury - Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 610 Agriculture ☐ 620 Other Food & Drug ☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 630 Liquor Laws ☐ 640 R.R. & Truck ☐ 650 Airline Regs. ☐ 660 Occupational Safety/Health ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Mgmt. Relations ☐ 730 Labor/Mgmt. Reporting & Disclosure Act ☐ 740 Railway Labor Act ☐ 790 Other Labor Litigation ☐ 791 Empl. Ret. Inc. Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 463 Habeas Corpus - Alien Detainee ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 840 Trademark SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit ☐ 490 Cable/Sat TV ☐ 810 Selective Service ☐ 850 Securities/Commodities/Exchange ☐ 875 Customer Challenge 12 USC 3410 ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 892 Economic Stabilization Act ☐ 893 Environmental Matters ☐ 894 Energy Allocation Act ☐ 895 Freedom of Information Act ☐ 900 Appeal of Fee Determination Under Equal Access to Justice ☐ 950 Constitutionality of State Statutes
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 444 Welfare ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☒ 440 Other Civil Rights	PRISONER PETITIONS ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition Habeas Corpus: ☐ 535 Death Penalty ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition		

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

VII. REQUESTED IN COMPLAINT:
☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

\$20,038,917.60

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes ☐ No**VIII. RELATED CASE(S)**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

Explanation:

March 25, 2013

DATE

SIGNATURE OF ATTORNEY OF RECORD



AO 239 (01/09) Application to Proceed in District Court Without Prepaying Fees or Costs (Long Form)

UNITED STATES DISTRICT COURT

for the

Drew Bradford

Plaintiff/Petitioner

v.

Please see List of Parties

Defendant/Respondent

Civil Action No.

APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS
(Long Form)

Affidavit in Support of the Application

Instructions

I am a plaintiff or petitioner in this case and declare that I am unable to pay the costs of these proceedings and that I am entitled to the relief requested. I declare under penalty of perjury that the information below is true and understand that a false statement may result in a dismissal of my claims.

Complete all questions in this application and then sign it. Do not leave any blanks: if the answer to a question is "0," "none," or "not applicable (N/A)," write that response. If you need more space to answer a question or to explain your answer, attach a separate sheet of paper identified with your name, your case's docket number, and the question number.

Signed: Drew Bradford Date: March 25, 2013

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly income amount during the past 12 months		Income amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ 0	\$ N/A	\$ 0	\$ N/A
Self-employment	\$ 0	\$ N/A	\$ 0	\$ N/A
Income from real property (such as rental income)	\$ 0	\$ N/A	\$ 0	\$ N/A
Interest and dividends	\$ 0	\$ N/A	\$ 0	\$ N/A
Gifts	\$ 70	\$ N/A	\$ 0	\$ N/A
Alimony	\$ 0	\$ N/A	\$ 0	\$ N/A
Child support	\$ 0	\$ N/A	\$ 0	\$ N/A

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Retirement (such as social security, pensions, annuities, insurance)	\$ 279.80	\$ N/A	\$ 279.80	\$ N/A
Disability (such as social security, insurance payments)	\$1004.00	\$ N/A	\$ 1004.00	\$ N/A
Unemployment payments	\$ 0	\$ N/A	\$ 0	\$ N/A
Public-assistance (such as welfare)	\$ 100.00	\$ N/A	\$ 100.	\$ N/A
Other (specify):	\$ 0	\$ N/A	\$ 0	\$ N/A
Total monthly income:	\$1379.80.00	\$ N/A 0.00	\$1379.80.00	\$ N/A 0.00

2. List your employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of employment	Gross monthly pay
None	None	None	\$ 0
None	None	None	\$ 0

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of employment	Gross monthly pay
N/A	N/A	N/A	\$ N/A
N/A	N/A	N/A	\$ N/A
N/A	N/A	N/A	\$ N/A

4. How much cash do you and your spouse have? \$ 42

Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Financial institution	Type of account	Amount you have	Amount your spouse has
Chase Bank	Checking	\$.64	\$ N/A
None	None	\$ None	\$ N/A
None	None	\$ None	\$ N/A

If you are a prisoner, you must attach a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months in your institutional accounts. If you have multiple accounts, perhaps because you have been in multiple institutions, attach one certified statement of each account.

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5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

Assets owned by you or your spouse		
Home (Value)	None	\$ 0
Other real estate (Value)	None	\$ 0
Motor vehicle #1 (Value)	\$2,890.00	\$ 2,890.00
Make and year:	Toyota 2003	
Model:	Camry	
Registration #:	HY7793 Registration said plate # is Registration #	
Motor vehicle #2 (Value)	None	\$ 0
Make and year:	None	
Model:	None	
Registration #:	None	
Other assets (Value)	None	\$ 0
Other assets (Value)	None	\$ 0

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
None	\$ None	\$ N/A
None	\$ None	\$ N/A
None	\$ None	\$ N/A

7. State the persons who rely on you or your spouse for support.

Name (or, if under 18, initials only)	Relationship	Age
None	None	None
None	None	None
None	None	None

AO 239 (01/09) Application to Proceed in District Court Without Prepaying Fees or Costs (Long Form)

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate.

	You	Your spouse
Rent or home-mortgage payment <i>(including lot rented for mobile home)</i> Are real estate taxes included? ☐ Yes ☒ No Is property insurance included? ☐ Yes ☒ No	\$ 746.00	\$ N/A
Utilities <i>(electricity, heating fuel, water, sewer, and telephone)</i>	\$ 125.00	\$ N/A
Home maintenance <i>(repairs and upkeep)</i>	\$ 0	\$ N/A
Food	\$ 20.00	\$ N/A
Clothing	\$ 25.00	\$ N/A
Laundry and dry-cleaning	\$ 5.00	\$ N/A
Medical and dental expenses	\$ 70.00	\$ N/A
Transportation <i>(not including motor vehicle payments)</i>	\$ 0	\$ N/A
Recreation, entertainment, newspapers, magazines, etc.	\$ 0	\$ N/A
Insurance <i>(not deducted from wages or included in mortgage payments)</i>		
Homeowner's or renter's:	\$ 0	\$ N/A
Life:	\$ 0	\$ N/A
Health:	\$ 144.12	\$ N/A
Motor vehicle:	\$ 50.00	\$ N/A
Other: Gasoline and Car repairs	\$ 125.00	\$ N/A
Taxes <i>(not deducted from wages or included in mortgage payments) (specify):</i>	\$ 0	\$ N/A
Installment payments		
Motor vehicle:	\$ N/A	\$ N/A
Credit card <i>(name):</i>	\$ N/A	\$ N/A
Department store <i>(name):</i>	\$ N/A	\$ N/A
Other:	\$ None	\$ N/A
Alimony, maintenance, and support paid to others	\$ None	\$ N/A

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Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ N/A	\$ N/A
Other (specify):	\$ N/A	\$ N/A
Total monthly expenses:	\$ 0.00	\$ 0.00

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☐ Yes ☒ No If yes, describe on an attached sheet.

10. Have you paid — or will you be paying — an attorney any money for services in connection with this case, including the completion of this form? ☐ Yes ☒ No

If yes, how much? \$ _____

If yes, state the attorney's name, address, and telephone number:

11. Have you paid — or will you be paying — anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form? ☐ Yes ☒ No

If yes, how much? \$ _____

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of these proceedings.

I appreciate the government. I have been on Federal Disability since June of 2001. I have lost my life savings. I have also been stuck by three cars in the last 10 years, once as a pedestrian severely limiting me. I owe \$2,100.00 in debts.

13. Identify the city and state of your legal residence.

Bedminster, New Jersey 07921

Your daytime phone number: 908-781-8852

Your age: 65 Your years of schooling: 17 Masters Degree in Education: 12/00

Last four digits of your social-security number: 4924

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Drew Bradford

Plaintiff,

v.

Joe Bolles, et al.

Defendants.

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

Case Number: 13-1910 FLW-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 _____ day of _____, 2013

Judge Freda L. Wolfson, U.S.D.J.