

CASTELLANI LAW FIRM, LLC

David R. Castellani, Esquire - ID #: 023691991

450 Tilton Road, Suite 245

Northfield, New Jersey 08225

(609) 641-2288

Attorneys for Plaintiff

RECEIVED and
FILED

OCT 18 2016

ATLANTIC COUNTY
LAW DIVISION

RAYUANA BETHEA Plaintiff(s), v. TOWNSHIP OF GALLOWAY, OFFICER B. TENNANT, OFFICER BUTLER, individually and in their official capacity, JOHN DOE GALLOWAY TOWNSHIP POLICE OFFICER 1-10, JOHN DOES 1-10, individually, jointly, severally and in the alternative. Defendant(s),	SUPERIOR COURT OF NEW JERSEY LAW DIVISION- ATLANTIC COUNTY DOCKET NO: ATL-L- 2315-16 <u>Civil Action</u> COMPLAINT
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Plaintiff, Rayuana Bethea residing in Clementon, County of Camden and State of New Jersey by way of Complaint against the Defendants says:

COUNT ONE

1. The Plaintiff, Rayuana Bethea, currently resides in Clementon, County of Camden, and State of New Jersey.
2. The Defendant Township of Galloway (hereinafter Defendant Galloway) is a municipality chartered by the State of New Jersey and as such is a political subdivision of the State of New Jersey and among other functions operates and maintains a law enforcement agency known as the Township of Galloway Police Department.

3. The Defendant Galloway is under a duty to run its policing activities in a lawful manner so as to preserve the rights, privileges and immunities guaranteed and secured to its citizens by the constitution and laws of the State of New Jersey.

4. The Defendants Officer Butler and Officer Tennant are adult resident citizens of the State of New Jersey and at all times herein, the Defendant Galloway police officers set forth above were members of the Township of Galloway Police Department and were acting by virtue of the positions as law enforcement officers of Galloway township and under color of state law. These individual Defendant Police Officers set forth above are being sued individually and in their official capacities as members of the Township of Galloway Police Department.

5. Upon information and belief, the Defendant Galloway Township Police Officers 1-10 were employed with Galloway Township Police Department and were acting under color of state law at all times mentioned herein and are being sued individually and in their official capacity. Such individuals within the Galloway township police Department are currently unidentified and may be partially or wholly responsible for the Plaintiff's injuries in violation of their New Jersey Constitutional Rights.

6. Each of the acts of the Defendants herein named were performed under the color and pretense of the New Jersey Constitution, statutes, ordinances, regulations, customs and usage of the County of Atlantic, State of New Jersey and the Township of Galloway under the authority of law enforcement officers of Galloway Township, New Jersey.

7. On or about October 18, 2015, Plaintiff was assaulted and the victim of domestic violence at the hands of her boyfriend at her boyfriend's residence, 250 Meadow Ridge Road, Galloway Township, New Jersey.

8. Plaintiff specifically called 911 as a result of the assault upon her.

9. Prior to the arrival of the Defendant police officers, Plaintiff left the residence of her boyfriend and waited outside. Her boyfriend had left the scene of the assault prior to the arrival of the Defendant police officers.

10. Upon arrival, the Defendant Butler, Tennant and John Doe Officers 1-10 demanded that the Plaintiff somehow opened the door to her then boyfriend's residence at 250 Meadow Ridge Road in Galloway Township to permit them access to the property.

11. At the time, Plaintiff did not have a key or have access to the residence and told the Defendants Officer Butler, Tennant as well as John Doe Officers 1-10 that she did not have the ability to gain access to the residence.

12. Plaintiff was not residing at the residence at the time, nor did she have any other type of ownership interest of the premises into which the police were requesting access.

13. After Plaintiff informed the Defendant Officers that she did not have the ability to provide them access to the residence, the Defendant Officers intentionally, deliberately, maliciously and without probable cause falsely arrested the Plaintiff and took her into police custody, handcuffing her and transporting her back to the Defendant Galloway Police Department.

14. At no time prior to her false arrest did the Plaintiff commit any type of physical act, threaten violence, or use any type of force or intimidation to obstruct or prevent the Defendant Police Officers from performing any law enforcement functions that they were attempting to perform at that time.

15. While in custody and handcuffed at the Defendant Galloway Police Station, Plaintiff requested to speak with a Judge and the Defendant Officers refused her access to the

same. Further, while at the police station, the Defendant Officers intentionally and deliberately handcuffed the Plaintiff to a bench and a rail, took her mug shot and forcibly removed her sweater and shoes leaving her handcuffed to the rail in a tank top and sports bra for approximately 20 to 30 minutes.

16. While at the Defendant Galloway police station, the Plaintiff requested medical treatment for the injuries she was caused by her boyfriend and the assault that occurred which prompted her to call 911 for police assistance. The Defendant Officers delayed in providing the Plaintiff with any treatment for those injuries.

17. While waiting for medical attention, Plaintiff overheard one of the officer's state to the other officer "we have to charge her with something".

18. Thereafter, the Defendant Officers and each of them, falsely, maliciously and intentionally charged the Plaintiff with an indictable crime of Obstruction of Justice knowing that the charges were false and that they were doing so without probable cause all for the purposes of attempting to conceal their false and unlawful arrest of the Plaintiff and the violation of her New Jersey Constitutional Rights prohibiting, unlawful arrest, unlawful search and seizure and violation of her New Jersey Due Process Rights both procedural and substantive.

19. Thereafter, on April 5, 2016, the Atlantic County Prosecutor's Office dismissed the criminal charges against the Plaintiff filed by the Defendant Officers as result of lack of probable cause and insufficient evidence. (See Dismissal attached hereto as *Exhibit "A"*).

20. It is further alleged that there was not reasonable or probable cause for the filing of the criminal charges and attempted prosecution of the Plaintiff by the Defendant Officers and these Defendant Officers should have known that this was the case prior to presenting the same to the Prosecutor's Office.

21. The aforementioned acts of the Defendant Officers were undertaken in a willful and malicious manner for the purposes of harming the Plaintiff and gaining an unfair advantage upon her and with the intent of damaging her reputation, integrity and good standing in the community all to the Plaintiff's detriment.

22. Based on the foregoing, the Defendant Officers set forth above maliciously prosecuted, maliciously abused the criminal complaint process by filing the false charges against the Plaintiff requesting that she be indicted for the same, all to conceal their false arrest and unconstitutional search and seizure of the Plaintiff.

23. The matter was terminated in favor of the Plaintiff on April 5, 2016 with the dismissal of these criminal charges by the Atlantic County Prosecutor's Office. (Exhibit "A").

24. Prior to the dismissal of the criminal charges filed against the Plaintiff by these Defendants, Plaintiff was subjected to continual extreme emotional distress and mental anguish and in fear of indictment was forced to suffer anxiety and uncertainty.

25. Plaintiff was forced to expend monies for attorney's fees and costs associated with her defense of these false charges.

26. It is further alleged that the Plaintiff was shocked, embarrassed, humiliated and her reputation was damaged and harmed as a result of the Defendant Officers' conduct.

27. It is further alleged that the Defendants' actions taken under color of state law intentionally interfered with the Plaintiff's rights, privileges and immunities secured by the New Jersey State Constitution including but not limited to her rights of equal protection under the law, right to due process, right to be free from malicious prosecution and abuse of process undertaken without probable cause by law enforcement officers of the State of New Jersey as well as the right

to be free of false arrest and unreasonable search and seizure pursuant to Article 1 paragraph 7 of the New Jersey Constitution and such other related paragraphs of the New Jersey Constitution.

28. The aforementioned actions of the Defendants depriving Plaintiff of the aforementioned New Jersey Constitutional rights privileges and immunities constituted a violation of the New Jersey Civil Rights Act, N.J.S.A. 10:6-2 et seq.

29. The Defendants' actions set forth above further constituted the common law torts of malicious prosecution, malicious abuse of process, false light, invasion of privacy, and placing Plaintiff in false light with the public, defamation, libel and slander per se. As a direct and proximate result of the Defendants' actions, Plaintiff was falsely arrested forced to under go criminal prosecution, resulting in extreme emotional distress, mental anguish and such other damages.

WHEREFORE, Plaintiff demands judgment against the Defendants named herein jointly, severally and in the alternative for all damages set forth above both compensatory and punitive, attorney's fees, interest, costs of suit and such other relief as the court may deem just and property.

COUNT TWO

1. Plaintiff incorporates in its entirety each and every paragraph of this Complaint as if fully set forth herein at length.

2. At all times mentioned herein the Defendant Galloway was responsible for the supervision, control instruction, hiring and training of its police officers including the Defendant Officers mentioned herein and made a part hereof.

3. The Defendant Township of Galloway and its Chief of Police were deliberately indifferent to the New Jersey Constitutional rights of the Plaintiff and others by failing to adequately screen and train their employees and specifically the Defendant Officers, Butler,

Tennant and John Doe Officers 1-10 and by failing to equip them with the necessary tools to handle reoccurring and predictable situations such as those involving the Plaintiff's domestic violence incident and as a result of their failure to adequately screen and train its employees, the Plaintiff was falsely arrested, maliciously charged with false criminal charges and was otherwise damaged.

4. Defendant Township of Galloway and its Chief of Police were aware of a pattern, practice and custom that existed within the Galloway Police Department of falsely arresting and charging citizens without probable cause and did not undertake to discipline or re-train the individual Defendants' conduct evidencing the Chief of Police's tacit ratification of the aforementioned conduct.

WHEREFORE, Plaintiff demands judgment against the Defendants named herein jointly, severally and in the alternative for all damages set forth above both compensatory and punitive, attorney's fees, costs of suit and such other relief as the court may deem just and property.

Dated: October 18, 2016

BY:

CASTELLANI LAW FIRM, LLC

DAVID R. CASTELLANI, ESQUIRE

JURY DEMAND

Plaintiff hereby demands trial by a jury on all issues herein.

DESIGNATION OF TRIAL COUNSEL

David R. Castellani, Esquire, is hereby designated as trial counsel in this matter.

CERTIFICATION UNDER RULE 4:5-1

I, David R. Castellani, Esquire, by certifying, pursuant to New Jersey Court Rule 4:5-1, that to the best of my knowledge, the claims raised herein are not the subject of any other action

pending in any Court of the subject of any arbitration proceeding, and no such other action or arbitration is contemplated.

I certify that the foregoing statements made by me are true and accurate to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment for perjury.

Date:

10/18/16



DAVID R. CASTELLANI, ESQUIRE
Attorneys for Plaintiff(s),

File# 7016-0600-0001-1890-5024

RECORDING REQUESTED BY:

Tyesah German Bey (sui Juris)

TYESHA N. GERMAN (Ex Relatione)

AND WHEN RECORDED MAIL TO:

Tyesah German Bey

[752 Black Horse Pike #1464]

[Near PLEASANTVILLE, NEW JERSEY 08232]

Northwest Amexem




Witness:
A Free and Sovereign Moorish American National Amexem/Africa/America
All Rights Reserved


Witness:
A Free and Sovereign Moorish American National Amexem/Africa/America
All Rights Reserved



THE MOORISH NATIONAL REPUBLIC FEDERAL GOVERNMENT NORTHWEST AFRICA.
THE MOORISH DIVINE AND NATIONAL MOVEMENT OF THE WORLD.

Northwest Amexem / Northwest Africa / North America.

'The North Gate'

Societas Republicae Ea Al Maurikanos.

Aboriginal and Indigenous Natural Peoples of the Land.

The true and de jure Al Moroccans / Americans.

Aberment Of Jurisdiction - Quo Warranto

For The Record, To Be Read Into The Record

Notice to Agent is Notice to Principal – Notice to Principal is Notice to Agent.

December 20, 2017

GALLOWAY TOWNSHIP MUNICIPAL COURT (INC. APRIL 1774)

DON PURDY (MAYOR/CHIEF EXECUTIVE)

300 EAST JIMMIE LEEDS ROAD

GALLOWAY, NEW JERSEY 08205

Phone: (609) 652-3700 ext. 1 Fax: (609) 652-2029 Email: gallowaycourt@gtmj.org

DON PURDY (Chief Executive) dpurdy@gtmj.org Phone: (609) 652-3700

ROSEANNE LUGG (Municipal Employee) gallowaycourt@gtmj.org Phone: (609) 652-3700 ext. 1 Fax: (609) 652-2029

DONNA A. HIGBEE (Municipal Employee) dhigbee@gtmj.org Phone: (609) 652-3705

Re: S. PATEL #0116 (Municipal Employee) BILL OF ATTAINER No. 014254, 014255, 006657, 006658, 006659

Res Judicata

Hagans v Lavine 415 U.S. 533., There is no discretion to ignore lack of jurisdiction. *Joyce v U.S.* 474 2d 215; The law provides that once State and Federal jurisdiction have been challenged, it must be proven. *Main v Thiboutot* 100. S. Ct 2501 (1980); 'Jurisdiction can be challenged at any time' and 'jurisdiction, once challenged, cannot be assumed and must be decided'. *Basso v Utah Power and Light Co.* 495 F.2d 906,910.

As all government entities and alleged private corporations must be a creature of the American Constitution, this is a formal Request and Command for GALLOWAY TOWNSHIP MUNICIPAL COURT (Inc. APRIL 1774) and/or HOWARD E. FREED (MUNICIPAL MINISTERIAL OFFICER) to produce for the record, the physical documented 'Delegation of Authority', as Proof of Jurisdiction, as required by Law, per Article III, Section 1 of the United States Republic Constitution.

PUBLIC HAZARD BONDING OF CORPORATE AGENTS All officials are required by federal, state, and municipal law to provide the name, address and telephone number of their public hazard and malpractice bonding company and the policy number of the bond and, if required, a copy of the policy describing the bonding coverage of their specific job performance. Failure to provide this information constitutes corporate and limited liability insurance fraud (15 USC) and is *prima facie* evidence and grounds to impose a lien upon the official personally to secure their public oath and service of office. (18 USC 912)

"Whoever, having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, willfully and contrary to such oath states or subscribes any material matter which he does not believe to be true, is guilty of perjury and shall be fined no more than \$2,000.00 or imprisoned not more than five years or both." 18 U.S.C. §1621

cc

MAYOR, DON PURDY (CHIEF EXECUTIVE) dpurdy@gtmj.org
Phone: (609) 652-3700

CLERK, ROSEANNE LUGG (MUNICIPAL EMPLOYEE)
gallowaycourt@gtmj.org Phone: (609) 652-3700 ext. 1
Fax: (609) 652-2029

CHIEF OF POLICY ENFORCEMENT, DONNA A. HIGBEE (MUNICIPAL EMPLOYEE) dhigbee@gtmj.org Phone: (609) 652-3705

POLICY ENFORCER, S. PATEL #0116 (MUNICIPAL EMPLOYEE)

New Jersey State Attorney General

Christopher S. Porrino

New Jersey State Secretary

Lt. Governor, Kim Guadagno

New Jersey Governor

Chris Christie

United States Department of State

Rex W. Tillerson

United States Justice Department

Jefferson Beauregard "Jeff" Sessions III

Tyesha German
Tyesha German Bey, Ex-Relatione <TYESHA GERMAN>
Authorized Representative

Flesh and Blood Being, In Propria Persona

All Rights Reserved, U.C.C. 1-207/1-308; U.C.C. 1-103

(c/o P.O. Box 1464 752 Black Horse Pike Pleasantville New Jersey 08232)

Northwest Amexem



Violation Warning

Denial of Rights Under Color of Law Violation of Liberties

Violation Warning -- 18 U.S.C. 241; 18 U.S.C. 242; 18 U.S.C. 245

Corpus Delicti and Mailing Location:

Tyesah German Bey (su juris) Ex Relallon
TYESHA N. GERMAN®
All Rights Reserved Allodial without Prejudice/Recourse
In Care Of: 752 Black Horse Pike #1484
Near: [Pleasantville, New Jersey 08232]

Name of Public Servant Recipient and Address:

S. PATEL #0116 (MUNICIPAL EMPLOYEE)
GALLOWAY TOWNSHIP MUNICIPAL COURT (INC APRIL 1774)
300 E JIMMIE LEEDS ROAD
GALLOWAY, NEW JERSEY (TERRITORY) 08205

Statement Of Fact (May have attachment): Fraud & Breach of Fiduciary Duties

The sole principal of the American Constitution 1971 and the obligation of all public servants pursuant to Article VI of the American Constitution are to preserve, protect, and secure the rights/liberties of the People against any encroachment of all corporations and public servants. / "NO PLEA" to: #014254, #014255, #006657, #006658, and #006659

SEE AFFIDAVIT ATTACHED

I certify that the foregoing information stated here is true and correct to the best of my ability and entered in honor. Autograph: Tyesah German Bey Date: December 26 2017

Lawful / Legal Notice and Warning

Federal Law provides that it is a crime to violate the Rights of the people under the Color-Of-Law. You can be held personally liable for violating the Personal Liberties of the People, and for committing 'Fraud'.

Attempting to cause a person to do something by telling that person that such action is required by law, when it is not required by law, is not only Fraud, it is a felony and is Treason. Law being the American Constitution, pursuant to Article VI, as well the USC Codes, which are in harmony with the American Constitution of 1791:

Title 18, Part 1, Chapter 13 §241, §242, and §245 of United States Codes of Law:

18 USC §241: If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, commonwealth, Possession, or district in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or Laws of the United States, or because of his having so exercised the same; or, If two or more persons go in disguise on the highway, or on the premises of another, with the intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured -

They shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section, or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death.

18 USC §242: Whoever, under 'color' of any law, statute, ordinance, regulation, or custom, wilfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or Laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, that are prescribed for the citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section, or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years or for life, or both, or may be sentenced to death.

18 USC §245: provides that Whoever, whether or not acting under color of law, intimidates or interferes with any person from participating in or enjoying (the estate, identified as) any benefit, service, privilege, program, facility or activity, provided or administered by (a person / agent / Officer / Public Servant, operating through an agency, corporation, or association of) the United States; [or] applying for or enjoying employment or any prerequisite thereof, by any agency of the united states; shall be fined under this title, or imprisoned not more than one year, or both.

WARNING: You are in violation of Federal Law. Persisting with violating my Liberties with unconstitutional demands will lead to your personal liability, as well as the company, agency and/ or association, you are operating through.

You are advised to cease and desists your untoward actions and demands, which are in violation of the People's Personal Liberties. You are also advised to seek personal lawful counsel if you do not understand the law, so that you may govern yourself accordingly.

Notice of Service:

I, Tyesah German Bey, certify that I personally delivered this Notice to above named Recipient and address on December 26 2017 at 300 E JIMMIE LEEDS ROAD p.m./a.m.

I, Tyesah German Bey, certify this Notice has been delivered to the above named recipient via Certified mail Delivery #: 70 0001 1890 5827 on December 27 2017

SEND TO: Jefferson Session, United States Attorney General, United States Justice Department 950 Pennsylvania Avenue NW, Washington, D.C. 20530 • email: askdoj@udoj.gov • Fax: 202 307-6777

**Moorish Americans – Aboriginal and Indigenous Natural Peoples of the Land
Northwest Amexem / Northwest Africa / North America
~ The North Gate ~**

Exhibit C

#014254-#014255-#006657-#006658#006659

To: Galloway Township (Qua Si) Municipal Court (Inc. April 4th 1774)
300 Jimmie Leeds Road Near [Galloway, New Jersey 08205]

Petitioner's Affidavit of Fact, Evidence, and Information

Tyesah German Bey (sui juris)
TYESHA GERMAN (Ex Relatione)
In Care of: 752 Black Horse Pike #1464
Near: [Pleasantville, New Jersey 08232]

Chronos / Day 20, March, 2017 A.D. = 1437 M.C.

Petitioner / Accused / Witness: TYESHA N. GERMAN (Ex Relatione), Tyesah German Bey (Sui Juris), Natural Person, In Propria Persona (Not Pro Se) and not 'Cognate' to, nor related to, any 'Nom de Guerre' nor to any other fictional entity; created under color by the unclean hands of others through Misrecital or 'Artificial Legal Construct'; nor a 'Man-of-Straw'; as written, typed, photocopied, misrepresented, or deceptively scribed in ALL CAPITAL LETTERS by the unclean hands of others.

Reference: Ticket(s) / Suit(s) / Summons / Bill(s) of Exchange Instrument(s) Number#s 014254-014255-006657-006658-006659

(Note: #014254-#014255-#006657-#006658 and #006659)

Drawee, Non – original Copy)

dated: December 20, 2017 A.D. Copy - Bill - Instrument issued by: Prosecuting Witness / Accuser / Policeman / Officer S. Patel I.D. Number 0116

Respondent(s): Howard E. Freed, Magistrate

Prosecutor: N/A

Officer: S. Patel #0116

All Other Judicial Officers, Accusers, and Parties of Interest:

Galloway Township Municipal Court (Inc. April, 1774)

United States of America Republic, North America

Affidavit of Facts / Subject Matter / Cause of Action:

Demand to Vacate and to Void Notwithstanding Tickets / Suits / Summons / Citations / (misrepresented) Bill(s) of Exchange

Which are in violation of the Substantive Rights of the Natural People and Citizens; and affirmatively ruled as unconstitutional by the Supreme Court of the United States of North America

Anti-constitutional Ticket - Instruments Issued Under the Quasi- Criminal, Private-Entity Authority of Galloway Township Municipal Court (Inc. April 1774), And Its Officers; Business Located at 300 East Jimmie Leeds Road United States of America Republic, North America

Declaration of Petitioner's Status:

I, the Petitioner, Tyesah German Bey, state and Publish for the Record: My 'Declaration of Status': Aboriginal / Indigenous Natural Person; Freehold by Birthright, Inheritance and Primogeniture; Affirming my Substantive Rights to Travel upon the public Roadways and Highways, in harmony with the Highest and most supreme Law of the Land. I Am 'In Propria Persona' (Not Pro Se); and not 'Cognate' to any 'Nom de Guerre' or any other such like fiction entity; created by the hands of others by way of Misrecital or 'Artificial Legal Construct'; nor a 'Man-of-Straw'; as written, typed, photocopied, or scribed in ALL CAPITAL LETTERS. I am a Natural Dweller and Natural Citizen in, of, and on the Lands of my Forefathers – Lemuria/Northwest Amexem / Northwest Africa / North America / The North Gate.

References: **Declaration Of The Rights Of The Child – International Law - 1959: Principle 3:**
"The child shall be entitled from his birth to a name and a nationality".

Universal Declaration of Human Rights of 1948 – General Assembly: International Law: Article 15:

(1) Everyone has the right to a nationality.

(2) No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.

The Rights of Indigenous People E/Cn. 4/Sub. 2/1994/2/Add. 1 (1994). Part 1, Article 5,

"Every Indigenous Individual Has The Right To A Nationality."

Treaty of Peace and Friendship Between Morocco and The United States: 1787 / 1836

Treaty of Marrakech – Supreme Law of the Land

United States Executive Order 13107: "The Implementation of Human Rights Treaties"

Jurisdiction:

Article VI, Clause 2 of the United States Constitution

Clause 2: This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby; any Thing in the Constitution or the Laws of any State to the Contrary notwithstanding.

COMES NOW for the record the Alleged Accused, and Petitioner, Tyesah German Bey, In Propria Persona; a 'Natural Person' and NOT a 14th Amendment Corporate Person nor a 'Nom de Guerre' construct, whose Substantive Rights have been violated and abridged; standing squarely "In Propria Persona, Sui Juris" and upon my Birthright Nobility, being 'In Full Life', duly Affirmed under allegiance to my Moorish American Nation; Organic 'Right Law' Republican Form of Government, North America; and under Affirmation and Oath to the Five Principles of Light – being, Love, Truth, Peace, Freedom and Justice, (Isonomi); and being "Part and Parcel" of this organic said Government; do squarely Affirm and Attest to the Truth. That on December 20th upon traveling East on Collins Road heading towards the corner of Collins and Pitney Road, navigating my destination to the supermarket, I came to a complete stop at the corner of Collins Road and Pitney Road acknowledging the municipal employee parked on the brush to my right. Observing due care, while completely stop, I look both ways signaling to make a right turn and I proceeded to head South on Pitney. About a 1/2 mile of my traveling South on Pitney Road to my destination, I acknowledge the municipal employee vehicle swerve from behind another traveler headed South on Pitney Road now speeding upon oncoming traffic to only pull up behind my automobile abruptly and turn on emergency lights. I signaled right, parking my automobile on the corner of Spencer Lane and Pitney Road. Now parked I acknowledge a municipal employee exits his vehicle and approaches my right side of automobile demanding State license, registration and insurance, never indentifying himself at anytime. I stated to him that I was not a party to any said instruments and was not doing commerce but traveling to the Supermarket. I then ask what was his cause for hindering my travels, he then stated that I failed to make a complete stop at the stop sign and that the register owner of the vehicle license was suspended. I assured the municipal employee that I was not performing commerce and that the private property, being my automobile, was for the use of traveling only! Also stated that if there were of any said suspension it had to be dealt with thorough the agency of Department of Motor Vehicle Commission to which I stated documentation had been in the process of being submitted. The non indentified municipal employee then stated that in order to drive on public roads ways that I needed to have the said State required documents in which he demanded. I then explained that I was a traveler and it was my birthright to travel upon the highways and byways without having the demanded documents as I have a travel card! The unidentified municipal employee then asked to see that Identification. Under duress, do to my hindrance of travel, I gave him my travel identification card to which he looks at the identification and then sates he would return with it once he could identify who I was after me verbally telling and showing my travel identification card. After some time four to five more municipal employee arrive in municipal vehicles. Now under threat and duress I call my partner to notify him of what is going on. While I'm on the phone a municipal employee approaches the right side of my automobile and indentify his self as the sergeant stating that I needed to provided some form State Driver license or insurance and even coerce me to provide a credit card to indentify myself if not that I would be arrested and that my automobile would be towed as it could not be on the roads as it needed to be insured. I explained that I again was not doing commerce therefore me to provide driver license would be to admit that I was doing commerce which I clearly stated that I was traveling to the Supermarket and my travel identification was sufficient and lawful documentation. I also explained if the municipal employee felt as if my automobile was a safety risk due to the fact it did not have the said required documents that I had my own tow service that would take my own private property to my domicile. I was told that that was not an option. I was approached on the left side of my automobile with a knock on the window then the municipal employee proceed to open my automobile door and makes a verbal summons for me to step out of the vehicle! I asked the municipal employee why do I need to step out of my automobile, he explains that it's needed to further the investigation, I then ask what investigation was I under and what laws have I broken. He proceeds to tell me to exit the vehicle and steps onto the right side of my vehicle. While standing I asked what laws have a broken to which none of the employees stated what laws I had broken. Under threat, duress, and coercion I was put into handcuffs, placed in the back seat of the initiated municipal employee vehicle and kidnapped and taken to the municipal employee facilities. There I was harassed by questions and threaten with future harm if I continue to indentify as a Moorish American National traveling upon my ancestor estate. Some two 1/2 hours I was let go and given the unlawful suits.

Whereas,

I am appearing 'Specially' and not 'Generally'. To demand for this Court to have the following Alleged Tickets / Suits / Summon(s) / Citation(s) / (misrepresented) Bill(s) of Exchange: #014254-014255-006657, 006658, 006659 and the unlawful and 'colorable' proceedings, unlawful warrants, etc., related to it / them, declared as Vacated; as Void; and as lawless Tickets / Suits / Summons / Citations / (misrepresented) Bill(s) of Exchange, For the Court's lack of 'Subject Matter Jurisdiction'; the lack of 'Personam Jurisdiction'; the lack of 'Due Process'; the lack of an 'Injured Party' (Corpus Delicti); and that the State does not, nor does any of its subordinate corporate Entities or Agent(s), have any lawful right or lawful authority, to transfer or convert the exercising of a 'Right' into a 'Crime'; nor does the State possess such authority; nor does any of its franchised corporate Entities, Agent(s), or Officers possess, the lawful right, or authority, to punish, to incriminate, or to charge anyone with a 'Crime', absent of a 'True Bill' and 'Indictment' by a Grand Jury; or to injure, or to intimidate, or to threaten any Natural Person / People or Citizen(s) for enjoying or exercising any 'Substantive Right' (or any other secured 'Right') exercised by them, and secured for the people by the Established Law of the Land.

Reserving all Rights secured for the Natural Person / People and Citizen(s), under the Supreme Law of the Land; and Reserving all other Natural Rights, Divine Rights, Substantive Rights, Liberties, Privileges and Immunities, Reserved for the People and Citizens; secured under the Authority of the Constitution for The United States Republic of North America; and by International Law; to which the Judges of every State; the Officers of this Court; all State Agents / Agencies; all other Contractors, Officers and / or Representatives of, or for, New Jersey State Republic; or the Officers or Agent(s) of the foreign State of New Jersey Corporate Entity, are Bound to uphold, to support, and to respect, by Law and by Oath, the Supreme Law. It is further stated, for the record, that the State's hired Officers, Employees, Agent(s) and Entities (being the same, in partnership) are Bound, to support and to uphold the Constitution for The United States Republic; and that the unlawful theft (under a color-of-law) of my personal Liberties, Rights, Immunities, Person, or Property; being Held, Abridged, or Arrested by any Official, Person(s) or Agent(s) contracted by the Officers of **Galloway Township Municipal Court**, Incorporated (April 1774), or by its Employees, for monetary ransom, or legal extortion by virtue of (voided Due Process action(s); or for any other extorting or 'colorable' purposes, is a violation of the Substantive Rights of myself; a crime against the sacred Trust of the Natural People; a violation of 'Fiduciary Duty'; An 'Abandonment of Office'; a 'Perjury of Oath'; and repugnant to the Constitution. These conspired acts of collusion and practices of abusing authority are by 'Colore Officii'.

Ticket(s) / Suit(s) / Summons / Citation(s), etc., are all 'Bills of Exchange'. Anyone who is served with these 'implied in law' – contract - Instruments, should be made cognizant of having the 'right' to be served the 'Original' copy of the said Instrument; and their right to sign the Original Instrument, and pay it on the spot. And if the Police Officer(s) or Agent(s) denies the recipient the capacity to do so, then the Ticket(s) / Citation(s) / Bill(s) of Exchange are voided, as the process is unlawful in its nature in the first instance. The Natural Person(s) being (effectively) imposed with these Instruments are systematically denied the ability to receive the 'Original' copy of these Instrument(s) / Bill(s) of Exchange / Presentment(s), and thus the 'proper service' principle of due process is 'Colored'. The recipient is, thus, disabled to 'return' the Original Instrument(s) / Presentment(s) / Bill(s) of Exchange to the issuing 'Drawer', appearing to 'not' have been willing to accept the Original, and thus 'Honor' the 'Bill(s) at the instance of the issuance of it / them. This contrived violation of 'Due Process' of Law ultimately manifests (in Court) with an Administrative / Ministerial Court 'decision' or 'conviction' made or levied against the unsuspecting, so-called, 'Violator'. This act is a supreme violation against Article III of the Constitution, and is void of law - essentially a nullity.

It is reasonable for any Natural Person(s) or Citizen(s) to assume that the **Galloway Township Municipal Court (INC. April 1774)** would recognize such 'Improper Service' as being void of law; and that such an improper service, as prescribed and defined under 'The Bills of Exchange Act', constitutes 'Misrepresentation' and 'Negative Misprision'.

In order for a 'Bill of Exchange' or 'Presentment' (which Ticket(s) / Citation(s) / or Summons all constitute to have and possess lawful validity, the Drawer has to have, and has to possess, the authority and knowledge to create it. Police Officers, establishing for themselves, the position of Drawer(s); and any other person(s) or Agent(s) who issue such quasi – judicial instruments, are aware of the facts of law, concerning these Instruments' and their violation – of – due process nature. Police Officers and other Municipal Agents (Drawer(s) have been, and are, continually violating the Natural People and Citizens.

Whereas,

They create the conditions that (falsely) establish that the Natural Person(s) and Citizens, to whom the Drawer / Police Officer or Agent(s) issue such Ticket(s) / Suit(s) / Summon(s) / Citation(s) / (misrepresented) Bill(s) of Exchange, go into 'Dishonor' and are, thus, convicted in Court by Default and Dishonor, by way of the 'misrepresented' process. This causes the recipient(s) of such Instruments to appear (under threat, duress, and coercion) before the non-Article III Municipal Court(s), as a 'Drawee' in 'Dishonor'. The Court Officers are well aware of this 'constructed' faulty process; and are aware that the recipient of such Bill(s) of Exchange - Instruments should be given the 'Original' copy of the Ticket(s) / Suit(s) / Summons / Citation(s) Bill(s) of Exchange; in order that the unsuspecting recipient may have the opportunity to Return, or satisfy or Honor the 'payment' Demand of pre-prescribed and adjudged payment to the Drawer / Police Officer/Prosecuting Witness/ Accuser, being the creator of, and issuer of, that Bill(s) of Exchange Instrument. Police Officers or other Agent(s) who issues such Instruments; and address them to others, are, by legal definition, the 'Drawer'.

The possession of weapons by anti-constitution Officials, Police Officer and other corporate Agent(s); and their practiced enforcement of a Color-of-Law; and the applying of, and the using of, contemptuous methods and the issuing of misrepresented Instruments, to subvert Due Process; and their practiced abrogation of, and their suppression of, 'The Bill of Rights'; and their addressing of other violations made by, or initiated by, the State, or by its franchised Officers, Agent(s) or Agencies, have been, and are used and initiated to rob, to threaten, to intimidate, or to injure the Natural People and Citizens. All of these acts are violations of Established Law. The Supreme Court of these United States, under the command of its 'Republican Form of Government', as Established under the Constitution for the United States, has ruled that such actions, laws and ordinances, on the part of the State, its Officers, and its Agents, are a 'Color-of-Law' and are unconstitutional. These collective 'Colore Officii' acts and laws, initiated under a 'Color-of-Authority' are in violation of Title 18, Chapter 13, Sections 241 and 242 of The United States Codes of Law; and are also in violation of Title 42 of the Codes of Law for The United States of America.

'Supreme Law of the Land'

The Senators and Representatives before mentioned, and the Members of the several State Legislatures, and all executive and judicial Officers, both of the United States and of the several States, shall be bound by Oath or Affirmation, to support this Constitution; but no religious Test shall ever be required as a Qualification by any Office or public Trust under the United States.

United States Supreme Court Decisions - Stare Decisis:**(Original Jurisdiction – Article III: Rights of Travel / Substantive Rights)**

The Right to Travel; The Right to Mode of Conveyance; The Right to Locomotion are all absolute rights, and the Police can not make void the exercise of rights. State v. Armstead, 60 s. 778, 779, and 781:

The right to Park or Travel is part of the Liberty of which the Natural Person, citizen cannot be deprived without "due process of law" under the Fifth Amendment of the United States Constitution. Kent v. Dulles 357 US 116, 125:

The State is prohibited from violating substantive rights. Owens v. City, 445 US 662 (1980); and it can not do by one power (eg. Police power) that which is, for example, prohibited expressly to any other such power (eg. Taxation / Eminent Domain) as a matter of law. US and UT v. Daniels, 22 p 159, nor indirectly that which is prohibited to it directly. Fairbanks v. US 181, US 283, 294, 300:

Traveling in an automobile on the public roads was not a threat to the public safety or health and constituted no hazard to the public, and such a traveler owed nothing more than "due care" (as regards to tort for negligence) to the public and the owner owed no other duty to the public (eg. State), he / she and his / her auto, having equal rights to and on the roadways / highways as horses and wagons, etc.; this same right is still substantive rule, in that speeding, running stop signs, traveling without license plates, or registration are not threats to the public safety, and thus, are not arrestable offenses. Christy v. Elliot, 216 I 131, 74 HE 1035, LRA NS 1905 – 1910: California v. Farley 98 CED Rpt. 89, 20 CA 3d 1032 (1971).

Obligations of State Courts:

The United States Supreme Court: *State courts, like federal courts, have a "constitutional" obligation to safeguard personal liberties and to uphold federal law. Stone v. Powell 428 US 465, 96 S. Ct. 3037, 49 L. Ed. 2d 1067.*

The United States Supreme Court: *The obligation of state courts to give full effect to federal law is the same as that of federal courts. New York v. Eno. 155 US 89, 15 S. Ct. 30, 39 L. Ed. 80.*

The United States Supreme Court: *An administrative agency may not finally decide the limits of its statutory powers; this is a judicial function. Social Security Board v. Nierotko. 327 US 358, 66 S. Ct. 637, 162 ALR 1445, 90 L. Ed. 719.*

Section 1028 of Title 18 designates three special non-federal identification documents and gives them preferred treatment. These three documents, in absence of a national identify card, are the prime means by which an individual establishes his identity in the United States. 1508. Specifically Mentioned Identification Documents – 18 U.S.C 1028

Therefore, the officers of Galloway Township (Inc. April 1774) have no right to supersede their limited, inferior jurisdiction; nor do they possess the lawful right to deny due process to the petitioner.

Notice to Agent(s) is Notice to Principal. The binding 'Official Oath', and 'Oath of Ethics' taken by all present person(s), and any past person(s), formerly holding Public Trust or Public Office; and by virtue of that Trust, are obligated under the Authority of The United States Republic, and by the Supreme Law of the Land, to not abridge; not to Dishonor; but to respect and protect the Substantive Rights, Liberties, and Immunities of the 'People'. The Obligations of all Officials, holding seats of Government, or occupying positions of authority, still stands.

Void Alleged Ticket(s) / Suit(s) / Summons / Citation(s) / (misrepresented) Bill(s) of Exchange; as Reason for Vacating and Granting Relief:

Relief may be granted where the Ticket(s) / Suit(s) / Summons / Citation(s) / (misrepresented) Bill(s) of Exchange, Number 014254, #014255, #006657, #006658 and Number 006659, or any Action(s) or 'Order(s)' arriving from its / their construction, is Void because the Court lacked Jurisdiction over the 'Subject Matter'; and lacked 'Personal Jurisdiction' over the parties(s); in addition to Misrepresentation and a denial of 'Due Process' of Law. The accusing party(s) (Police Officers, Private Security Guards, Officers of the Court, etc.) acted in some manner inconsistent with Constitution constraints, and contrary to Constitutional - secured Due Process; or otherwise acted beyond the delegated Powers granted to it / them, under the Supreme Law of the Land. When Evidence, a Motion, or Affidavit challenges a Ticket(s) Suit / Summons / Citation / Bill(s) of Exchange, as void, the Inferior Court and the District Court lacks discretion. In accord with the Established Law of the Land, I, **Tyesah German Bey**, move that the Judge and Prosecutor of this Court make Void and Vacate the unconscionable suits / ticket instruments / (misrepresented) Bill(s) of Exchange, as their improper presentments are contrary to, and repugnant to, the Constitution; being a violation against secured Due Process Rights; and contrary to, and repugnant to, Oath of Ethics, Official Oaths, Fiduciary Duties, and foreign to 'Right Law' Principles.

Galloway Township Municipal Corporation (April 1774), and its corporate – contracted Officers, Agent(s) and Personnel, are sighted for unlawfully using the Public Trust to transfer or convert a 'Right' into a 'Crime', under a 'Color-of-Law', under a 'Color-of-Authority' and under a 'Color-of-Right'.

I, **Tyesah German Bey**, should be compensated for my economic losses; by way of infringements upon my liberties; and for the mental anguish imposed upon me by being forced under threat, to answer to 'colorable' actions, caused by Agent(s) or persons, who concurred in their 'agreed' actions to cause my private, Divine Rights, Civil Liberties, Pursuit of Happiness, Security of Personalty or Property, etc., to be infringed upon, confiscated, arrested or restrained in any manner, by any acts, actions, and / or processes that, in any respect, violate:

Amendment IV: The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

Amendment V: No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment of indictment of a grand jury, except in cases arising in the land or naval forces, or in the militia, when in actual service in time of war or public danger; nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.

Amendment VI: In all criminal prosecutions, the accused shall enjoy the right to a speedy trial, by an impartial jury of the state and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witness against him; to have compulsory process of obtaining witnesses in his favor, and to have the assistance of council for his defense.

Amendment VIII: Excessive bail shall not be required, nor excessive fines imposed, nor cruel or unusual punishments inflicted.

Amendment IX: The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.

Amendment X: The powers not delegated to the United States by the Constitution, nor prohibited by it to the states, are reserved to the states respectively, or to the people.

Article III, Sections 1 and 2, of the Constitution; **Article VI** of the Constitution; and the Rights of Indigenous Peoples. Part I, Articles 1 through 6

These Unconscionable Ticket – Suits / Summons / Citations / are (misrepresented) Bill(s) of Exchange, **Number 014254, #014255, #006657, #006658 and Number 006659** should be Vacated and Dismissed, as they originate from a non-judicial entity, through acts of 'Misprision', Improper Service, and a 'lack of Due Process', to wit:

1. The absence of a sworn Affidavit, Oath or Affirmation (as required per 4th Amendment) and not accompanying the Suits / Tickets / Bill(s) of Exchange – **Number 014254, #014255, #006657, #006658 and Number 006659**, renders them void; and thus, by their unlawfully - imposed sanctions, a violation of 'Due Process'.
2. The absence of a lawfully required indictment from a legitimate grand jury, due to the accusation of a 'crime';
3. A lack of 'Corpus Delicti' - there is no injured party;
4. The lack of a Jury of my own National Peers, to examine substantiated and documented evidence, to determine whether or not I violated the Law of the Land or whether the Officers or Personnel of **Galloway Township (Inc. April 1774)** violated the Law of the Land; with all supporting Exhibits and Witnesses and Claims (not waived); and all other points of Due Process and de jure Law, including the 'nature' of the charges, etc., entered into evidence for the Public Record; in accord with 'Due Process'; which has not been waived by me, is not waived by me; nor ever intended to be waived by me.
5. The private corporation of **Galloway Township Municipal Court (Inc. April 1774)**, through unlawful actions committed by its Officers, Agent(s) and Personnel, under its 'contract' and claimed authority - seized my Rights, Liberties and / or Private Property under a 'Color-of-Law' and without Due Process of the Law; and did not proceed with fair or just notification or compensation, as commanded by the Law of the Land; causing me the loss of the rightful, lawful, and Substantive Right to use, to enjoy, to exercise, and to possess my Rights, Liberties, and / or Private Property.
6. The Supreme Court has consistently ruled against such 'Color-of-Authority' and 'Racketeering' activities, and the evidence is, hereby presented to this Inferior Court, in order that the Officers of this Court may have the opportunity to rectify and to correct, for the record, such acts. These (Lack of Due Process) proceedings are in violation of the 'Oath of Office' taken by the Judges and Prosecutors of every State; and in violation of 'The Code of Ethics' for all Law Enforcement Officers; an Oath which all Police Officers are required to take and to sign these Oath – bound Instruments (public records) shall be entered into evidence in support of my defense, and supported by the Supreme Court of the United States. And I demand that any Officer of the Court, or any other Agent(s) or Person(s) contracted by the Court or its Officers, who contends or contests that they are not Obligated to support and to uphold the Constitution for (The State of New Jersey); and to not support the Constitution for The United States Republic of America, then let that Agent(s) or Person(s) be sworn in, or affirmed 'For the Record' and Testify for the Record, in support of, or contrary to, the Constitution, and The 'Oath of Ethics', etc.
7. If the Officers of this Court, and / or any Agent(s) and / or Person(s) hired by, or contracted by them, to arrest, to fine, to detain, or to do any form of tort or injury to me; and whosoever executes an official act or actions, contradicting or contrary to, their 'Fiduciary Duties', as delegated to their Offices or to their positions of Public Trust; and if the same Agent(s) or Person(s) insists upon violating my Rights, Liberties and Immunities (secured by Nature and by National and International Law); and if the same Agent(s) or Person(s) insists upon violating my Rights, Liberties, and Immunities, secured by the Constitution for the United States Republic, and by the Common Law Customs of Civilized Government; and violating the secured - Rights of the Natural People and Citizens, I retain the right to Remedy and Suit to regain and to Secure my Rights, Liberties, Immunities, Personalty, and / or Property; and retain my Right to Due Process under the Law.

8. If any Officers, Agent(s) or Person(s) in this Court has any objection to the 'Law of the Land'; or if anyone objects to the Constitution in any manner or form, the let that Official, Agent(s) or Person(s) be sworn in and testify to that effect. If there is no one to object, for the Record, I move that this Court recognize the limited authority delegated to the Court; and the limited authority delegated to any and all Officers of the Federal, State, and Municipal / City Officers. I move that the Presiding Officer(s) (Prosecutor and Judge) of this Court acknowledge the reason that Government and Constitutions exist; and to Dismiss these misrepresented instruments(s) and thus the false and unsupported charges conjunctive to them, which violate the IV V, VI, VII, VIII, IX and X Amendments to the Constitution; and that the perpetrators of these acts of 'Malfeasance' compensate me for my economic injury; for the loss of the use of, and the enjoyment of, my Rights, Liberties, Immunities, and / or my Personalty or Property; and that I be compensated for the loss of my time from work to answer (under threat, duress, and coercion) to unlawful procedures; and that I be relieved from, and / or compensated for any arbitrary demand(s) made (under a 'Color-of-Law) for the ransom / bail, if such was demanded of me for the recovery of my Rights, Liberties, Immunities, Personalty, Property, Person, Conveyance(s) or any other Papers, Things, or Effects, from those contracted Agent(s) or Person(s) executing an act or actions under the authority of the Court or (Galloway Township Municipal Court Inc. April 1774) and its Personnel / Contractors, to commit violations against my Natural Person by abridging the Constitution, Treaty(s), or by violating Amendments IV, V, VI, VII, VIII, IX and X of The Bill of Rights, Established in the year 1791 A.D. by way of the establishment of the Republic.

Amendment IV of the Constitution for the United States Republic, North America:

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures shall not be violated, and no warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

Amendment V

No person shall be held to answer to a capital, or otherwise infamous crime, unless on a presentment or indictment of a grand jury, except in cases arising in the land or naval forces, or in the militia, when in actual service in time of war or public danger; nor shall any person be subject for the same offense to be put twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.

Amendment VI

In all criminal prosecutions, the accused shall enjoy the right to a speedy trial, by an impartial jury of the state and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and be informed of the nature and cause of the accusation; to be confronted by the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of council for his defense.

Amendment VII

In suits at common law, where the value in controversy shall exceed twenty dollars, the right to a trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise reexamined in any court of the United States, than according to the rules of the common law.

Amendment VIII

Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted.

Amendment IX

The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.

Amendment X

The powers not delegated to the United States by the Constitution, nor prohibited by it to the states, are reserved to the states respectively, or to the people.

Article VI: The Constitution for the United States Republic, North America; (Supreme Law of the Land - Treaties). 1787 / 1836 - "The Treaty of Peace and Friendship between the United States and Morocco" - 1787 / 1836 A.D. = 1207 / 1256 M.C. The Petitioner is competent to be a witness, and that the facts contained herein are true, correct, complete, and not misleading, to the best of Petitioner's / Declarant's firsthand knowledge and belief.

Article VI, Clause 2 and 3 of the United States Republic Constitution

Clause 2: This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby; any Thing in the Constitution or the Laws of any State to the Contrary notwithstanding.

Clause 3: The Senators and Representatives before mentioned, and the Members of the several State Legislatures, and all executive and judicial Officers, both of the United States and of the several States, shall be bound by Oath or Affirmation, to support this Constitution; but no religious Test shall ever be required as a Qualification by any Office or public Trust under the United States.

The Supreme Court of the United States Republic

The Supreme Court of The United States Republic of America has Addressed the Substantive Law of the Land, Dealing with the States' Officials, Officers and Agencies violating and abridging the Substantive Rights of The People, to the effect that:

The State of New Jersey; **Galloway Township Municipal Court, Incorporated April 1774**; its Officers; the Prosecutor; and any Agent(s), Personnel, Employees, and / or Contractor(s), being a party to, or claiming to be, a party of interest in any case, under a Color-of-Law, as in this case, are in violation of the United States Codes of Law – **Title 18, Chapter 13, Sections 241 & 242.**

The Prosecutor and Judge of this Ministerial Court: All "Lack of Due Process" claims and charges should be 'Dismissed' for Want of Jurisdiction, and Refused for Cause.

Day 20, December, 2017 A. D. = 1437 M.C.

I 'Affirm' that all statements, facts, and information, presented in this Affidavit / Writ, are correct and true; and are presented as Evidence – "Exhibit A" 'for the record'. I, furthermore, state that the foresaid Exhibit, Evidence, Information and Facts are placed in Evidence in this case, as I am reserving my right to 'Present' my own 'Proper Self' by Sovereign Right, and Affirmed to the best of my knowledge and belief.

I Am:

Witness: Natural Person, In Propria Persona (and not Pro Se) - Authorized Representative
All Rights Reserved: Special Appearance under Threat, Duress and Coercion.

Notice to Agent(s) is Notice to Principle.

c.c.

Galloway Township Municipal Clerk / Ministerial Court

Judge: Howard E. Freed

Prosecutor: n/a

New Jersey Attorney General

United States Attorney General (*certified*)

Documents of Aboriginal and Indigenous Natural Peoples of Northwest Amexem / North America – North Gate. M.D.N.M.



Mayor, **Don Prudy** (*Chief Executive*) dpurdy@gtmj.org Phone: (609) 652-3700

Judge/Magistrate, **Howard E. Freed** (*Ministerial Officer*), gallowaycourt@gtmj.org (609) 652-3700 ext. 1

Municipal Clerk, **Roseanne Lugg** (*Municipal Employee*), gallowaycourt@gtmj.org Phone: (609) 652-3700 ext. 1
Fax: (609) 652-2029



Chief of Police Enforcement, **Donna A. Higbee** (*Municipal Employee*), dhigbee@gtmd.org Phone: (609) 652-3705



POLICY ENFORCER, (*not law*), **S. Patel #0116** (*Municipal Employee*)

ANTHONY PADOVANI, ESQ.
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HAMMONTON, NEW JERSEY 08037
(609) 567-9400
Attorney for First Party Defendant
JOSEPH P. CHIAROLANZA

2016 OCT 17 AM 11:17

ROBERT RATHBONE,	:	SUPERIOR COURT OF NEW JERSEY
	:	
Plaintiffs	:	ATLANTIC COUNTY-SPECIAL CIVIL
V.	:	DOCKET NO. DC-003848-16
	:	
JOSEPH P. CHIAROLANZA	:	CIVIL ACTION
	:	
Defendants (First Party	:	FIRST PARTY DEFENDANT
Defendant)	:	ANSWER
	:	

JOSEPH P. CHIAROLANZA,	:	SUPERIOR COURT OF NEW JERSEY
	:	
First Party Defendant,	:	ATLANTIC COUNTY-LAW DIVISION
V.	:	DOCKET NO. ATL-L- -16
	:	
ROBERT RATHBONE AND/OR	:	CIVIL ACTION
GALLOWAY TOWNSHIP POLICE DEPARTMENT	:	
	:	
Third Party Defendant	:	CROSS CLAIM AND THIRD PARTY
	:	COMPLAINT
	:	

The first party defendant, Joseph P. Chiarolanza, by way of answer states the following:

COMPLAINT

1. Denied. Defendant did exactly what the Law allows him to do and what he was contracted to do.

WHEREFORE, First Party Defendant, Joseph P. Chiarolanza, requests that a judgement be entered in favor of the First Party Defendant dismissing all counts of the complaint against them.

SEPARATE DEFENSES

By way of separate defenses, the first party defendant, Joseph P. Chiarolanza, sets forth the following:

SCP
ACC
SD
10-17-16
87.00
439
1197

FIRST SEPARATE DEFENSE

Plaintiff's complaint fails to state a claim upon which relief can be granted against the Defendant.

SECOND SEPARATE DEFENSE

Plaintiff is barred from bringing the within action by the lack of privity between plaintiffs and answering defendant.

THIRD SEPARATE DEFENSE

The damages alleged to have been sustained by the Plaintiff, were not directly or proximately caused by the Defendant(S).

FOURTH SEPARATE DEFENSE

The acts or omissions or breach of duty alleged were the result of other person, persons, or entities over whom answering Defendant had not control.

FIFTH SEPARATE DEFENSE

Plaintiff has failed to mitigate the alleged damages, if any.

SIXTH SEPARATE DEFENSE

Defendant installed the flares correctly.

SEVENTH SEPARATE DEFENSE

Plaintiff, is barred from bringing the within action by the doctrine of laches, unclean hands, estoppel and collateral estoppel, and answering Defendant reserves the right to move to dismiss same accordingly.

EIGHTH SEPARATE DEFENSE

Answering Defendant, has not breached any duty to Plaintiff, or any other party.

NINTH SEPARATE DEFENSE

Answering Defendant, acted at all times material hereto reasonably, carefully and prudently, consistent with the standard of reasonably prudent shop repairs/mechanics in the community.

TENTH SEPARATE DEFENSE

Accord and satisfaction.

ELEVENTH SEPARATE DEFENSE

Plaintiff did not abide by the Statutes as stated in the Administrative Code of New Jersey or the New Jersey Statutes Annotated.

JOSEPH P. CHIAROLANZA,	:	SUPERIOR COURT OF NEW JERSEY
	:	
Plaintiffs	:	ATLANTIC COUNTY-SPECIAL CIVIL
V.	:	DOCKET NO. DC-003848-16
	:	
ROBERT RATHBONE AND/OR	:	CIVIL ACTION
GALLOWAY TOWNSHIP POLICE DEPARTMENT	:	
(Third Party Defendant)	:	
	:	
Defendants	:	CROSS CLAIM AND THIRD PARTY
	:	COMPLAINT
	:	

The first party defendant, Joseph P. Chiarolanza, located at 831 West White Horse Pike, Egg Harbor City, NJ 08215 by way of crossclaim/third party complaint states the following:

FIRST COUNT

PROCEDURAL HISTORY

1. On or about the 25th day of June 2016, the plaintiff, Robert Rathbone, purchased four (4) Buschwacker Pocket Style Flares from defendant's place of business, JC Motor Sports, LLC. for his 1999 Grand Cherokee Jeep.

2. That at the aforesaid time and place, the defendant, J.C. Motor Sports, LLC. sold to the Plaintiff four (4) Buschwacker Pocket Style Flares. Plaintiff purchased and left with the aforesaid materials. Said materials were not in the custody or control of first party defendant at that time.

3. Two days later or or about the 27th day of June 2016, the plaintiff, Robert Rathbone, returned to defendant's place of business and stated that he now wanted the defendant to install four (4) Buschwacker Pocket Style Flares at defendant's place of business, JC Motor Sports, LLC. to his 1999 Grand Cherokee Jeep.

4. The estimate for said installation was \$ 100 per Flare or \$ 400 plus miscellaneous expenses/sales tax for a total of \$ 449.40.

5. Plaintiff agreed to pay said price.

6. That at the aforesaid time and place, defendant's employee, Jerry Connelly, accepted the aforesaid four (4) flares to be installed and plaintiff turned over the flares.

7. The flares were installed on or about July 7, 2016.

8. Plaintiff arrived on or about July 7, 2016 and did not want to pay the installation of the flares.

9. Defendant's manager, Rob Lancaster, explained to the defendant that the business had a right to keep the vehicle until such time as the labor was paid in full.

10. Defendant contacted the Third Party Defendant Galloway Township Police Department.

11. The Third Party Defendant, Galloway Township Police Department arrived and tried to negotiate on behalf of the Plaintiff and requested to speak with the owner.

12. The Manager of JC Motor Sports, LLC. stated that the company is a Limited Liability Corporation (LLC); however, the Galloway Police Department insisted to speak to the owner/operator of JC Motor Sports, LLC.

13. At this point in time, first party defendant, Joseph P. Chiarolanza, came out of his office and stated that he is a member of the LLC who owns this repair/mechanic shop located at 831 West White Horse Pike in Galloway Township, New Jersey known as JC Motor Sports, LLC.

14. The Galloway Township Police Department demanded that the 1999 Grand Cherokee be returned to its owner.

15. Mr. Chiarolanza and Mr. Lancaster both stated that said vehicle would be returned once payment was made.

16. The following day Galloway Township Police Department arrested First Party Defendant, Joseph P. Chiarolanza at JC Motor Sports, LLC. for not making proper disposition.

17. Notice of claims, in the form prescribed by New Jersey Statutes Annotated 59:8-4, were signed and acknowledged by defendant Galloway Township Clerk.

18. The plaintiff, Robert Rathbone, and/or third party defendants, Galloway Township Police Department; and/or thier agents, servants and/or employees, are liable to the defendant, for their acts which were not in accordance with New Jersey Statutes.

19. New Jersey Statutes Annotated, specifically, NJSA 2A:44-20 gives the right to owners of repair shops or car mechanics the right to refuse to return a customer's vehicle to the customer until such time as the vehicle repair is paid in full.

20. First Party Defendant, Joseph P. Chiarolanza, countersues Plaintiff and files a Third Party Complaint against Third Party Defendant(s) for the following:

CAUSES OF ACTION

- 1) Slander to be determined by a jury.
- 2) Libel to be determined by a jury.
- 3) False Imprisonment damages to be determined by a jury.
- 4) Intentional Infliction of Emotional Distress to be determined by a jury.
- 5) Attorneys Fees to a Criminal Attorney to get the charges dismissed.
- 6) Attorneys Fees to a Criminal Attorney to Expunge Defendant's Arrest Record.
- 7) Attorneys Fees against Plaintiff, Robert Rathbone, to defend this claim.

WHEREFORE, First Party Defendant, Joseph P. Chiarolanza, hereby demands judgment against the plaintiff, RAYMOND RATHBONE and/or third party Defendant, GALLOWAY TOWNSHIP POLICE DEPARTMENT and/or and/or their agents, servants and/or employees, all of which are liable to the first party defendant, for their acts and for such sums as will reasonably compensate the plaintiff for his damages as stated above according to the laws of New Jersey, plus costs of suit, and for whatever other relief the Court deems equitable and just.

SECOND COUNT

1. First Party Defendant, JOSEPH P. CHIAROLANZA, hereby repeats the allegations as contained in paragraphs one through twenty of the first count and makes same a part hereof as though set forth at length herein.

21. That as a result of the aforesaid carelessness and negligence of the defendants, the plaintiff, Joseph P. Chiarolanza, sustained severe emotional injuries to his body of both a temporary and permanent nature. That as a result of these injuries, he has suffered and will continue to suffer, in the future, great pain, physical disability and mental anguish. The plaintiff has been and will continue to be in the future unable to attend to his normal duties and occupations.

WHEREFORE, First party defendant, Joseph P. Chiarolanza, hereby demands judgment against the plaintiff, RAYMOND RATHBONE and/or third party Defendant, GALLOWAY TOWNSHIP POLICE DEPARTMENT and/or and/or their agents, servants and/or employees, all of which are liable to the First party defendant, for their acts and for such sums as will reasonably compensate the plaintiff for his damages as stated above according to the laws of New Jersey, plus costs of suit, and for whatever other relief the Court deems equitable and just.

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that attorney Anthony Padovani, Esquire, is hereby designated as trial counsel in the above captioned litigation on behalf of plaintiffs.

CERTIFICATION PURSUANT TO RULE 4:5-1

This is to certify that, to the best of my knowledge, the matter in controversy is not subject to any other claims. Further, at this time, there are no known other parties who should be joined in this action.

DEMAND FOR JURY TRIAL

The plaintiff hereby demands a trial by jury as to all issues set forth herein.

CERTIFICATION PURSUANT TO RULE 1:38-7(b)

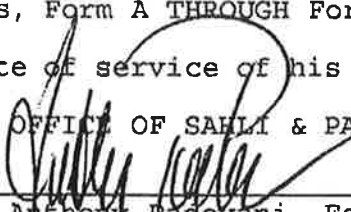
I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

DEMAND FOR DISCOVERY

Pursuant to Rule 4:17-1(b) (i), First Party Defendant, hereby demand from the defendants, certified answers to Uniform Interrogatories, Form A THROUGH Form D-1 within sixty days from the date of service of his Complaint.

LAW OFFICE OF SAHLI & PADOVANI

Dated: 10/17/16


By: Anthony Padovani, Esq.
Attorneys for First Party
Defendant, Joseph P. Chiarolanza

FORM C

FILED

NOV 04 2016

SUPERIOR COURT OF NEW JERSEY
LAW DIVISIONAnthony P. Savio, Esq.
Attorney for Defendant

Your Name

Atlantic

County

750 S. White Horse Pike, P.O. Box

Docket Number

ATL-L-2314-16

Street Address

HAMMONTON, NJ 08037

Town, State/Zip Code

(609) 967-9400

Telephone Number

RATHBONE

Plaintiff

vs.

CHIAO PANG

Defendant

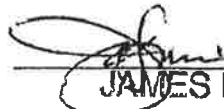
CIVIL ACTION
OrderThis matter having been brought before the Court on Motion of (check one)
☐ plaintiff ☒ defendant for an Order (describe relief requested)

transferring DC-3848-16 to Law Division

and the Court having considered the matter and for good cause appearing,

It is on this 4th day of Nov., 2016

ORDERED as follows:

DC-3848-16 is transferred to law
division under Docket ATL-L-2314-16.

 J.S.C.
 JAMES P. SAVIO, J.S.C.
☐ opposed☒ unopposed

LOUIS CHARLES SHAPIRO, P.A.

By: Louis Charles Shapiro, Esquire (New Jersey Bar I.D. No. 028201997)

1063 E. Landis Avenue

Vineland, New Jersey 08360

(856) 691-6800; Fax No. (856) 794-3326

Email: shapl@prodigy.net

Attorney for Plaintiffs, Carla Weldon, Troy Sessoms, C.S., C.S.,

D.F.J., D.F.J., D.F.J., and D.F.J.

CARLA WELDON, individually and on
behalf of C.S., C.S., D.F.J., D.F.J., D.F.J.,
and D.F.J.; TROY SESSOMS, individually
and on behalf of C.S., C.S., D.F.J., D.F.J.,
D.F.J., and D.F.J.; C.S., a minor; C.S., a
minor; D.F.J., a minor; D.F.J., a minor;
D.F.J., a minor; and D.F.J., a minor;

Plaintiffs,

vs.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - ATLANTIC COUNTY

CIVIL ACTION

DAMON G. TYNER, in his official capacity;
as ATLANTIC COUNTY PROSECUTOR;
ATLANTIC COUNTY PROSECUTOR'S
OFFICE; ATLANTIC COUNTY
SHERIFF'S OFFICE; JOHN/JANE DOE(S)
LAW ENFORCEMENT OFFICERS
OF THE ATLANTIC COUNTY
PROSECUTOR'S OFFICE 1-20; JOHN/
JANE DOE(S) ATLANTIC COUNTY
SHERIFF'S OFFICERS 1-20;
JOHN/JANE DOE(S) NEW JERSEY
STATE TROOPERS, DETECTIVES AND
LAW ENFORCEMENT OFFICERS 1-20;
JOHN/ JANE DOE(S) LAW
ENFORCEMENT OFFICERS OF THE
CITY OF PLEASANTVILLE POLICE
DEPARTMENT 1-20; JOHN/JANE
DOE(S) LAW ENFORCEMENT
OFFICERS OF THE TOWNSHIP OF
GALLOWAY POLICE DEPARTMENT
1-20; JOHN/JANE DOE(S) LAW
ENFORCEMENT OFFICERS OF THE

OCEAN COUNTY PROSECUTOR'S
OFFICE 1-20; JOHN/JANE DOE(S)
LAW ENFORCEMENT OFFICERS OF
THE ATLANTIC CITY POLICE
DEPARTMENT 1-20; JOHN/JANE
DOE(S) LAW ENFORCEMENT
OFFICERS OF THE EGG HARBOR
CITY POLICE DEPARTMENT 1-20;
JOHN/JANE DOE(S) LAW
ENFORCEMENT OFFICERS OF THE
EGG HARBOR TOWNSHIP POLICE
DEPARTMENT 1-20; JOHN/JANE
DOE(S) LAW ENFORCEMENT
OFFICERS OF THE TOWNSHIP OF
MULLICA POLICE DEPARTMENT 1-20;
JOHN/JANE DOE(S) LAW
ENFORCEMENT OFFICERS FROM
OTHER LAW ENFORCEMENT
AGENCIES 1-20; and ABC OTHER LAW
ENFORCEMENT AGENCIES 1-20,

Defendants.

COMPLAINT AND JURY DEMAND

Plaintiffs, Carla Weldon and Troy Sessoms, individually and on behalf of minor Plaintiffs C.S., C.S., D.F.J., D.F.J., D.F.J., and D.F.J. (collectively, "Plaintiffs"), by way of Complaint against Defendants, Damon G. Tyner, in his official capacity as Atlantic County Prosecutor, the Atlantic County Prosecutor's Office, the Atlantic County Sheriff's Office, John/Jane Doe(s) Law Enforcement Officers of the Atlantic County Prosecutor's Office 1-20; John/Jane Doe(s) Atlantic County Sheriff's Officers 1-20; John/Jane Doe(s) New Jersey State Troopers, Detectives and Law Enforcement Officers 1-20; John/Jane Doe(s) Law Enforcement Officers of the City of Pleasantville Police Department 1-20; John/Jane Doe(s) Law Enforcement Officers of the Township of Galloway Police Department 1-20; John/Jane Doe(s) Law Enforcement Officers of the Ocean County

Prosecutor's Office 1-20; John/Jane Doe(s) Law Enforcement Officers of the Atlantic City Police Department 1-20; John/Jane Doe(s) Law Enforcement Officers of the Egg Harbor City Police Department 1-20; John/Jane Doe(s) Law Enforcement Officers of the Egg Harbor Township Police Department 1-20; John/Jane Doe(s) Law Enforcement Officers of the Township of Mullica Police Department 1-20; John/Jane Doe(s) Law Enforcement Officers from Other Law Enforcement Agencies 1-20; and ABC Other Law Enforcement Agencies 1-20 (collectively, "Defendants"), allege as follows:

FIRST COUNT
Violation of Article I, paragraph 7 of the
New Jersey State Constitution

The Parties

1. Plaintiff, Carla Weldon ("Weldon"), is an adult individual who, at all relevant times, resided at 204 Cincinnati Avenue, Egg Harbor City, Atlantic County, New Jersey 08215. Weldon is the biological mother to minor Plaintiffs C.S. and C.S. and was, at all relevant times, the foster parent of the four minor Plaintiff children whose initials are D.F.J. Weldon brings this action individually and on behalf of the minor children.

2. Plaintiff, Troy Sessoms ("Sessoms"), is an adult individual who, at all relevant times, also resided at 204 Cincinnati Avenue, Egg Harbor City, Atlantic County, New Jersey 08215. Sessoms is the biological father to minor Plaintiffs C.S. and C.S. and was, at all relevant times and upon information and belief, acting as a foster parent and/or in such capacity for the four minor Plaintiff children whose initials are D.F.J. Sessoms brings this action individually and on behalf of the minor children.

3. Plaintiff, C.S., is a female biological child of Plaintiffs Weldon and Sessoms, who was

at the time of the events described herein two years old, and who resided in the Weldon-Sessoms household.

4. Plaintiff, C.S., is a male biological child of Plaintiffs Weldon and Sessoms, who was at the time of the events described herein approximately one year old, and who resided in the Weldon-Sessoms household.

5. Plaintiff, D.F.J., was at all relevant times a female foster child and cousin of the Plaintiff minor C.S. children who lived in the Weldon-Sessoms household, and who was 15 years old at the time of the events described in this Complaint.

6. Plaintiff, D.F.J., was at all relevant times a female foster child and cousin of the Plaintiff C.S. children who lived in the Weldon-Sessoms household, and who was 12 years old at the time of the events described in this Complaint.

7. Plaintiff, D.F.J., was at all relevant times a female foster child and cousin of the Plaintiff C.S. children who lived in the Weldon-Sessoms household, and who was 10 years old at the time of the events described in this Complaint.

8. Plaintiff, D.F.J., was at all relevant times a female foster child and cousin of the Plaintiff C.S. children who lived in the Weldon-Sessoms household, and who was seven years old at the time of the events described in this Complaint.

9. Defendant, Damon G. Tyner ("Tyner"), against whom suit is brought in his official capacity, is and was at all relevant times the appointed Atlantic County Prosecutor, was responsible for the operations of the Atlantic County Prosecutor's Office, and has a business address of 4997 Unami Boulevard, Suite 2, P.O. Box 2002, Mays Landing, Atlantic County, New Jersey 08330.

10. Defendant, Atlantic County Prosecutor's Office ("ACPO"), located at 4997 Unami

Boulevard, Suite 2, P.O. Box 2002, Mays Landing, Atlantic County, New Jersey 08330, is the chief law enforcement agency for Atlantic County and is responsible for, among other things, investigating and prosecuting felony criminal offenses which occur in Atlantic County.

11. Defendant, Atlantic County Sheriff's Office ("ACSO"), is a law enforcement agency with jurisdiction in Atlantic County, and which has a business address of 4997 Unami Boulevard, Mays Landing, Atlantic County, New Jersey 08330.

12. Defendants, John/Jane Doe(s) Law Enforcement Officers of the Atlantic County Prosecutor's Office 1-20 ("ACPO personnel"), are spokespersons, agents, detectives, and/or duly constituted law enforcement officers of various ranks, including but not limited to those acting in a supervisory capacity, who are employed and overseen by Tyner and others at the ACPO, and who may be responsible and liable for the acts and omissions described in this Complaint. Upon information and belief, the ACPO personnel have a business address at 4997 Unami Boulevard, Suite 2, P.O. Box 2002, Mays Landing, Atlantic County, New Jersey 08330.

13. Defendants, John/Jane Doe(s) Atlantic County Sheriff's Officers 1-20 ("Sheriff's Officers"), are agents, detectives, and/or duly constituted law enforcement officers of various ranks, including but not limited to those acting in a supervisory capacity, who are employed by the ACSO, and who may be responsible and liable for the acts and omissions described in this Complaint. Upon information and belief, the Sheriff's Officers have a business address of 4997 Unami Boulevard, Mays Landing, Atlantic County, New Jersey 08330.

14. Defendants, John/Jane Doe(s) New Jersey State Troopers, Detectives and Law Enforcement Officers 1-20 (the "State Police actors"), are agents, detectives, troopers, and/or duly constituted law enforcement officers with statewide jurisdiction and are of various ranks, including

but not limited to those acting in a supervisory capacity, who are employed by the New Jersey State Police, and who may be responsible and liable for acts and omissions described in this Complaint. The State Police actors' actual locations throughout the New Jersey State Police system are presently unknown. However, the business address for the Division of State Police is River Road, P.O. Box 7068, West Trenton, New Jersey 08628-0068.

15. Defendants, John/Jane Doe(s) Law Enforcement Officers of the City of Pleasantville Police Department 1-20 (the "Pleasantville officers") are agents, detectives, and/or duly constituted law enforcement officers of various ranks, including but not limited to those acting in a supervisory capacity, who are employed by the City of Pleasantville Police Department, and who may be responsible and liable for the acts and omissions described in this Complaint. Upon information and belief, the Pleasantville officers have a business address located at the Pleasantville Police Department, 17 N. 1st Street, Pleasantville, New Jersey 08232.

16. Defendants, John/Jane Doe(s) Law Enforcement Officers of the Township of Galloway Police Department 1-20 (the "Galloway officers") are agents, detectives, and/or duly constituted law enforcement officers of various ranks, including but not limited to those acting in a supervisory capacity, who are employed by the Township of Galloway Police Department, and who may be responsible and liable for the acts and omissions described in this Complaint. Upon information and belief, the Galloway officers have a business address located at the Galloway Township Police Department, 360 E. Jimmie Leeds Road, Galloway, New Jersey 08201.

17. Defendants, John/Jane Doe(s) Law Enforcement Officers of the Ocean County Prosecutor's Office 1-20 (the "Ocean County officers") are agents, detectives, and/or duly constituted law enforcement officers of various ranks, including but not limited to those acting in

a supervisory capacity, who are employed by the Ocean County Prosecutor's Office, and who may be responsible and liable for the acts and omissions described in this Complaint. Upon information and belief, the Ocean County officers have a business address located at the Ocean County Prosecutor's Office, 199 Hooper Avenue, P.O. Box 2191, Toms River, New Jersey 08754-2191.

18. Defendants, John/Jane Doe(s) Law Enforcement Officers of the Atlantic City Police Department 1-20 (the "Atlantic City officers") are agents, detectives, and/or duly constituted law enforcement officers of various ranks, including but not limited to those acting in a supervisory capacity, who are employed by the Atlantic City Police Department, and who may be responsible and liable for the acts and omissions described in this Complaint. Upon information and belief, the Atlantic City officers have a business address located at the Atlantic City Police Department, Public Safety Building, 2715 Atlantic Avenue, Atlantic City, New Jersey 08401.

19. Defendants, John/Jane Doe(s) Law Enforcement Officers of the Egg Harbor City Police Department 1-20 (the "EHC officers") are agents, detectives, and/or duly constituted law enforcement officers of various ranks, including but not limited to those acting in a supervisory capacity, who are employed by the Egg Harbor City Police Department, and who may be responsible and liable for the acts and omissions described in this Complaint. Upon information and belief, the EHC officers have a business address located at the Egg Harbor City Police Department, 500 London Avenue, Egg Harbor City, New Jersey 08215.

20. Defendants, John/Jane Doe(s) Law Enforcement Officers of the Egg Harbor Township Police Department 1-20 (the "EHT officers") are agents, detectives, and/or duly constituted law enforcement officers of various ranks, including but not limited to those acting in a supervisory capacity, who are employed by the Egg Harbor Township Police Department, and who may be

responsible and liable for the acts and omissions described in this Complaint. Upon information and belief, the EHT officers have a business address located at the Egg Harbor Township Police Department, 3515 Bargaintown Road, Egg Harbor Township, New Jersey 08234.

21. Defendants, John/Jane Doe(s) Law Enforcement Officers of the Mullica Township Police Department 1-20 (the "Mullica officers") are agents, detectives, and/or duly constituted law enforcement officers of various ranks, including but not limited to those acting in a supervisory capacity, who are employed by the Mullica Township Police Department, and who may be responsible and liable for the acts and omissions described in this Complaint. Upon information and belief, the Mullica officers have a business address located at the Mullica Township Police Department, 4528 S. White Horse Pike, P.O. Box 317, Elwood, New Jersey 08217.

22. Defendants, John/Jane Doe(s) Law Enforcement Officers from other law enforcement agencies 1-20 (the "unknown officers") are agents, detectives, and/or duly constituted law enforcement officers of various ranks, including but not limited to those acting in a supervisory capacity, who are employed by other law enforcement agencies, and who may be responsible and liable for the acts and omissions described in this Complaint. The business addresses for the unknown officers are as yet unknown.

23. Defendants, ABC Other Law Enforcement Agencies 1-20 (the "undetermined agencies") are other duly constituted law enforcement agencies whose roles, if any, in the events described in this Complaint are as yet undetermined, but which may be responsible and liable for the acts and omissions described in this Complaint. The business addresses for the undetermined agencies is as yet unknown.

24. To the extent the full and/or true name and/or identity of any Defendant is later

determined, through discovery and investigation, Plaintiffs reserve the right to amend the caption and body of this Complaint to name those individuals and/or agencies who and/or which may be responsible and liable for the acts and omissions described in this Complaint.

25. On April 20, 2017, Plaintiffs served evidence preservation letters upon numerous law enforcement agencies, including the Defendants named herein. Thus, Plaintiffs reserve the right to make a claim for evidence spoliation in the event discoverable evidence has not been preserved.

26. On June 23, 2017, Plaintiffs served Tort Claim Notices upon the Defendants pursuant to the New Jersey Tort Claims Act, N.J.S.A. 59:1-1, et seq.

Factual Allegations

27. At approximately 6:24 a.m. on March 30, 2017, Plaintiff Weldon was walking out of her bedroom on the second floor of her residence when numerous unknown Defendant officers entered the Plaintiffs' residence at 204 Cincinnati Avenue, in Egg Harbor City, New Jersey through the front door.

28. At the time, Plaintiff Weldon heard the Defendant officers yelling, "Police, police, put your hands up!"

29. Plaintiff Sessoms came down the stairs behind Plaintiff Weldon.

30. All six of the minor Plaintiff children were at home at the time, together with Plaintiffs Weldon and Sessoms.

31. At the time, one of the foster children identified as D.J.F. was walking down the stairs.

32. The officers were dressed in all black, wearing puffy vests, the backs of which were emblazoned with the word "POLICE."

33. About five officers were on the first floor with four of the children.

34. Some of the children were sitting on the couch on the first floor waiting for their school bus to arrive to take them to school that morning.

35. Approximately another six officers were running up the stairs toward Plaintiffs Weldon and Sessoms.

36. At least two of these officers had their firearms out.

37. The daughter of Plaintiffs Weldon and Sessoms, identified as C.S., who was two years old at the time, was headed back to bed on the second floor while the son of Weldon and Sessoms, C.S., who was approximately one year old, was asleep on the second floor.

38. Plaintiff Weldon saw guns pointed in the direction of the children when she came down the stairs with her hands up.

39. Upon information and belief, all of the children saw guns, except for the son of Plaintiffs Weldon and Sessoms, C.S., who was asleep at the time.

40. Amid the chaos and confusion of this police raid, one or more of the Defendant officers who invaded Plaintiffs' home on that morning asked why a bedroom door on the second floor was locked.

41. Plaintiff Weldon told the Defendant officers of her belief that the door was not locked.

42. In response, one of the Defendant officers cursed at her, and told her to stop lying, and/or that Weldon was "f---in' lying," or words to this effect.

43. The Defendant officers broke into that bedroom and damaged the door; as it turned out, the door had been locked by accident.

44. At some point during the raid, the young daughter of Plaintiffs Weldon and Sessoms, C.S., was in the arms of one of the Defendant officers.

45. A female Defendant officer told Plaintiff Weldon not to worry, but to continue to keep her hands up on the first floor.

46. Once all of the adults and children (except for C.S., the son of Weldon and Sessions) were in the living room of the residence, one or more of the Defendant officers began to mention a name with which the Plaintiffs were not familiar.

47. During this time, the Plaintiff minor children were on the couch, crying and hysterical.

48. At some point, however, the Defendant officers came to the realization that they had raided the wrong residence.

49. As a recognition and admission that the Defendant officers had violated Plaintiffs' right to the sanctity of their home, one of the Defendant officers offered to walk the children to their bus stop.

50. Upon information and belief, Defendants neither had a search warrant for the premises nor presented Plaintiffs with such a document.

51. Plaintiffs did not consent to, or voluntarily allow, Defendants' entry into their home.

52. In fact, one or more of the Defendant officers told Plaintiffs that they "came in because the door was open," or words to this effect.

53. Upon further information and belief, the Defendant officers also attempted, shortly after their illegal entry into Plaintiffs' residence, to gain entry into the apartment of one of Plaintiffs' neighbors, which entry that neighbor refused on account of Defendants' not being in possession of a search warrant. It is further alleged, upon information and belief, that Defendants later sought a warrant for this neighboring residence.

54. On or about April 1, 2017, Defendants Tyner, and/or the ACPO, and/or ACPO personnel

announced a joint investigation which culminated in police raids in Pleasantville, Egg Harbor City, and other areas of Atlantic County on March 30, 2017, the same day Plaintiffs' home was raided.

55. The raids announced by Tyner, by the ACPO, and/or by ACPO personnel shortly after Plaintiffs' home was raided resulted in the arrests of multiple suspects and seizures of narcotics and firearms at other locations, including the arrest of Kenneth J. Burrell, who was an alleged leader of a narcotics trafficking network and who, upon information and belief, lived on Buffalo Avenue and a short distance away from Plaintiffs' residence in Egg Harbor City.

56. Burrell's criminal case was prosecuted in Superior Court, Atlantic County.

57. On May 25, 2018, Defendants Tyner, and/or the ACPO, and/or ACPO personnel announced that Burrell had been sentenced to a lengthy prison term in Superior Court, Atlantic County.

58. Public pronouncements by Defendants Tyner, by the ACPO, and/or by ACPO personnel demonstrate that these ACPO defendants were in charge of the operation which led to the arrests of numerous individuals and seizure of illegal contraband, but which operation also resulted in the entry into Plaintiffs' home on March 30, 2017 in violation of the New Jersey Constitution.

59. These public pronouncements by Defendants Tyner, by the ACPO, and/or by ACPO personnel also confirmed the involvement, participation and/or assistance provided by officers from the multiple other law enforcement agencies referred to above in this Complaint.

60. Based on these public pronouncements by Tyner, by the ACPO, and/or by ACPO personnel, it is believed, and therefore alleged, that John/Jane Doe officers from the law enforcement agencies referred to herein entered Plaintiffs' home on March 30, 2017 in violation of the New Jersey Constitution.

61. Defendants violated Plaintiffs' rights under Article I, Paragraph 7 of the New Jersey Constitution by depriving them of their freedom from unreasonable searches and seizures - specifically, by illegally entering and remaining in Plaintiffs' home and by subjecting Plaintiffs to excessive force as described herein.

62. As a proximate result of Defendants' acts and omissions, Plaintiffs suffered damages, including but not limited to constitutional injury, property damage, and substantial emotional upset and mental pain, suffering, grief and anguish.

63. Plaintiffs bring this Count pursuant to the New Jersey Civil Rights Act, N.J.S.A. 10:6-2 (c), (d), (e), and (f).

64. Defendants Tyner, the ACPO, ACPO personnel, and those as-yet unknown defendants acting in a supervisory capacity are liable for the acts and omissions of the Defendant officers described in this Count and in the Counts set forth below, pursuant to the doctrine of *respondeat superior*.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants individually, jointly and severally, in amounts that would reasonably and properly compensate them in accordance with the law, together with punitive damages, prejudgment interest, reasonable attorney's fees, costs of suit, and such other relief as the Court deems just.

SECOND COUNT
Trespass

65. Plaintiffs incorporate the preceding paragraphs of this Complaint as if set forth at length herein.

66. Defendants, upon information and belief, were lacking a search warrant when they entered Plaintiffs' home.

67. Plaintiffs did not consent to Defendants' entry into their home.

68. Defendants' entry into Plaintiffs' home was unauthorized.

69. Upon information and belief, Defendants had no legal authority to enter Plaintiffs' residence and, in fact, indicated that they entered the Plaintiffs' home because "the door was open," or words to that effect.

70. Accordingly, Defendants committed the civil tort of trespass upon real property.

71. Defendants' actions in entering and remaining in Plaintiffs' home were intentional.

72. As a proximate result of Defendants' acts and omissions, Plaintiffs suffered damages, including but not limited to property damage, substantial emotional upset and mental pain, suffering, grief and anguish.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants individually, jointly and severally, in amounts that would reasonably and properly compensate them in accordance with the law, together with punitive damages, prejudgment interest, reasonable attorney's fees, costs of suit, and such other relief as the Court deems just.

THIRD COUNT
Intentional Infliction of Emotional Distress

73. Plaintiffs incorporate the preceding paragraphs of this Complaint as if set forth at length herein.

74. Defendants' actions as described herein were committed intentionally and/or recklessly.

75. Defendants' conduct as described in this Complaint was extreme and outrageous, including but not limited to the act of pointing loaded firearms at children whom Defendants could not reasonably have believed were engaged in criminal activity.

76. Defendants' actions proximately caused Plaintiffs to suffer emotional distress.

77. The emotional distress suffered by Plaintiffs was and is so severe that no reasonable person could be expected to endure it.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants individually, jointly and severally, in amounts that would reasonably and properly compensate them in accordance with the law, together with punitive damages, prejudgment interest, reasonable attorney's fees, costs of suit, and such other relief as the Court deems just.

FOURTH COUNT **Assault**

78. Plaintiffs incorporate the preceding paragraphs of this Complaint as if set forth at length herein.

79. By their actions and/or behavior described in detail herein, and in particular through the use of deadly weapons aimed in Plaintiffs' direction, Defendants caused Plaintiffs reasonably to be placed in fear and to believe that they were at risk of death, physical harm and imminent bodily injury, including by Defendants' physical menace.

80. Defendants actions were intentional and/or reckless.

81. As a proximate result of Defendants' acts and omissions, Plaintiffs suffered damages, including but not limited to substantial emotional upset and mental pain, suffering, grief and anguish.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants individually, jointly and severally, in amounts that would reasonably and properly compensate them in accordance with the law, together with punitive damages, prejudgment interest, reasonable attorney's fees, costs of suit, and such other relief as the Court deems just.

FIFTH COUNT
Negligence

82. Plaintiffs incorporate the preceding paragraphs of this Complaint as if set forth at length herein.

83. Defendants in the alternative were negligent and/or reckless in entering and remaining in Plaintiffs' residence without a warrant and/or without the consent of Plaintiffs.

84. Defendants, as law enforcement officers, owed Plaintiffs and/or the public a duty of care to abide by the New Jersey Constitution, to abide by the laws and regulations of the State of New Jersey, and to abide by the guidelines and directives which governed their employment as law enforcement officers, and owed Plaintiffs and/or the public a duty of care to act as reasonable law enforcement officers and/or to refrain from placing Plaintiffs and others in danger.

85. Defendants breached their duty of care in the following ways: (1) by invading the sanctity of the home, upon information and belief, without a search warrant and/or other legal justification to enter; and/or (2) by remaining in Plaintiffs' home longer than necessary; and/or (3) by pointing loaded firearms at and/or in the direction of the adult Plaintiffs; and/or (4) by pointing loaded firearms at and/or in the direction of minor children who could not have been involved in any criminal activity Defendants were investigating at the time; and/or (5) by causing property damage

at the residence; and/or (6) by failing properly to determine whether they were entering the correct residence pursuant to a search warrant, if the same was actually obtained; and/or (7) in such other ways as may be revealed in discovery.

86. As a proximate result of Defendants' acts and omissions, Plaintiffs suffered damages, including but not limited to property damage, substantial emotional upset and mental pain, suffering, grief and anguish.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants individually, jointly and severally, in amounts that would reasonably and properly compensate them in accordance with the law, together with prejudgment interest, reasonable attorney's fees, costs of suit, and such other relief as the Court deems just.

SIXTH COUNT

Negligent Infliction of Emotional Distress

87. Plaintiffs incorporate the preceding paragraphs of this Complaint as if set forth at length herein.

88. Defendants owed a duty of care as outlined in paragraph 84 of this Complaint, which is incorporated herein by reference.

89. Defendants negligently and/or recklessly breached their duty of care as outlined in paragraph 85 of this Complaint, which is incorporated by reference.

90. As a proximate result of Defendants' acts and omissions, Plaintiffs suffered severe emotional distress.

91. Furthermore, it was foreseeable that Defendants' acts and omissions would cause fright or shock severe enough to cause emotional injury in average persons.

92. The harm was foreseeable, in that Defendants: (1) entered the Weldon-Sessoms residence on the improper basis that "the door was open," or words to this effect; and/or (2) entered the residence, upon information and belief, without a warrant; and/or (3) failed to make certain that they were entering the correct residence; and/or (4) entered the residence with a show of overwhelming force which would place any adult – and particularly children – in fear; and/or (5) pointed loaded firearms at the adult Plaintiffs; and/or (6) pointed loaded firearms at children in the residence who could not have been involved in any criminal activity Defendants were investigating; and/or (7) other ways which may be revealed in discovery.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants individually, jointly and severally, in amounts that would reasonably and properly compensate them in accordance with the law, together with prejudgment interest, reasonable attorney's fees, costs of suit, and such other relief as the Court deems just.

SEVENTH COUNT
Negligent Supervision

93. Plaintiffs incorporate the preceding paragraphs of this Complaint as if set forth at length herein.

94. As alleged elsewhere herein, Defendants Tyner, the ACPO, the ACPO personnel, and/or the other as-yet unidentified supervisory officers were in charge of the law enforcement investigation and operations leading up to and on or about March 30, 2017, which resulted in the illegal raid on Plaintiffs' home in Egg Harbor City.

95. The acts and/or omissions complained of herein occurred and were within the scope of the Defendant officers' employment for Defendants Tyner, for the ACPO, for the ACPO personnel,

and/or for the other as-yet unidentified supervisory officers, and/or for the various law enforcement agencies by whom they were employed.

96. Defendants Tyner, the ACPO, the ACPO personnel, and/or other as-yet unidentified supervisory officers, and/or the various law enforcement agencies involved prior to and on March 30, 2017 negligently failed to supervise the actions and conduct of the Defendant officers who raided Plaintiffs' residence.

97. Upon information and belief, in addition to those acts and omissions which may be revealed in discovery, and in the alternative, Defendants Tyner, the ACPO, the ACPO personnel, and/or the other as-yet unidentified supervisory officers, failed to intervene and/or failed to prevent the illegal entry into Plaintiffs' home, failed to prevent the acts and omissions complained of herein, and/or failed to de-escalate the encounter at Plaintiffs' home, and/or, upon information and belief, failed to discipline some or all of those officers responsible for violating Plaintiffs' rights under the New Jersey Constitution and as otherwise described in this Complaint.

98. Such named and unnamed supervisory defendants had a duty to members of the public and to Plaintiffs to insure that such basic violations of rights under the New Jersey Constitution did not occur.

99. As a proximate result of Defendants' acts and omissions, Plaintiffs suffered damages, including but not limited to constitutional injury, property damage, substantial emotional upset and mental pain, suffering, grief and anguish.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in their favor and against Defendants individually, jointly and severally, in amounts that would reasonably and properly compensate them in accordance with the law, together with prejudgment

interest, reasonable attorney's fees, costs of suit, and such other relief as the Court deems just.

Respectfully submitted,

LOUIS CHARLES SHAPIRO, P.A.

By:


Louis Charles Shapiro, Esquire
Attorney for Plaintiffs

DATED: March 22 2019

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

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

LOUIS CHARLES SHAPIRO, P.A.

By:


LOUIS CHARLES SHAPIRO, ESQUIRE

DATED: March 22, 2019

CERTIFICATION PURSUANT TO RULE 4:5-1

To the best of the undersigned counsel's knowledge, information and belief, the matter in controversy is not the subject of any other court proceeding, nor is any other arbitration or court proceeding contemplated, except that Plaintiffs reserve the right to amend the within Complaint to name various as yet unknown John/Jane Doe Defendants, whose identities may become known through discovery and investigation.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

LOUIS CHARLES SHAPIRO, P.A.

By: 
LOUIS CHARLES SHAPIRO, ESQUIRE

DATED: March 22, 2019

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Louis Charles Shapiro, Esquire is designated as Trial Counsel for Plaintiffs in this action.

LOUIS CHARLES SHAPIRO, P.A.

By: 
LOUIS CHARLES SHAPIRO, ESQUIRE

DATED: March 22, 2019

DEMAND FOR INTERROGATORIES

TAKE NOTICE that, pursuant to New Jersey Court Rule 4:17-1, as amended effective September 5, 2000, Plaintiffs hereby demand that Defendants provide Answers to "Uniform Interrogatories Form "C" within the sixty (60) day time period prescribed by the New Jersey Court Rules.

LOUIS CHARLES SHAPIRO, P.A.

By: 

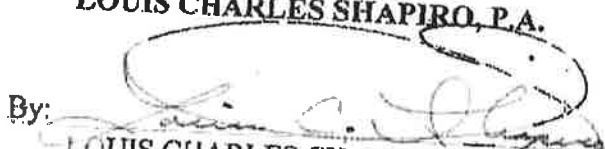
LOUIS CHARLES SHAPIRO, ESQUIRE

DATED: March 22, 2019

DEMAND FOR JURY TRIAL

TAKE NOTICE that the Plaintiffs hereby demand a Trial by Jury on all issues in accordance with the Rules of this Court.

LOUIS CHARLES SHAPIRO, P.A.

By: 

LOUIS CHARLES SHAPIRO, ESQUIRE

DATED: March 22, 2019

NEW JERSEY FEDERAL COURT
UNITED STATES DISTRICT COURT

Melvin family of Young
In propria person

Petitioner

GALLOWAY TOWNSHIP
MUNICIPAL COURT
ADMINISTRATIVE LAW JUDGE
HOWARD FREED

Respondent

Crimes

1. Fraud
2. Kidnapping
3. Unlawful Arrest
4. Trespassing on private property , Extortion
5. Threat, duress, collusion
6. New Jersey State CONSTITUTION violations
7. United States Constitution violations
8. Racketeer Influenced and Corrupt organization Act
9. Conflict Of Interest

(Summons Numbers # E-102772 , E-102773

On APRIL 07 2018,, GALLOWAY TOWNSHIP Police did state Melvin Young violate state statue 39:3-40 Driving while license are revoked or suspended-(Truth never licensed to be revoked or suspended).

Summons was filed in GALLOWAY TOWNSHIP Municipal Court based upon assumption of a mutual contract between the State of New Jersey, Incorporated, and myself, Melvin Young (mutual contact does not exist).

The respondent made there accusations in GALLOWAY TOWNSHIP Municipal Court in a malicious attempt to deprive petitioner of my rights, liberty, and proceeded to extort funds from me under color of law, duress, coercion, and threat of imprisonment.

The State of New Jersey Incorporated is in violation of established law (1. The right to travel; the right to mode of conveyance; the right to locomotion are absolute rights and the police cannot make void the exercise of right, State vs. Armstead 60 s. 778, 779, and 781; 2. The use of the highways for purpose of travel and transportation is not a mere privilege, but a common and fundamental right of which the public and natural being cannot be deprived, Chicago Motor Coach vs. Chicago 37 Illinois 200, 169, N.E. 22 ALR, Lisare vs. Chicago 139 Illinois 46 28 HE 934, Boone vs. Clark 214 s.w. 607, 25 AM jur (1st) Highway, Sec. 163 to Travel

- A. The right of a citizen to travel upon public highways and to transport ones property thereon either by carriage or automobile is not a mere privilege which a city may prohibit at will but a common right which he/she has under the right to life, liberty, and the pursuit of happiness; Thompson vs. Smith n154, S.E. 579
- B. State police power extends only to immediate threat to public safety, health, welfare etc. Michigan vs. Duke 266 U.S. Led. At 449
- C. The state is prohibited from violating substantive rights, Owen vs. City 445 US 662 (1980) and it cannot do by one power (police office) that which is for example prohibited expressly to any other such power US and UT vs. Daniels 22 P 159., Fairbanks vs. US 181 US 283, 294, 300;.
- D. Where rights secured by the constitution are involved there can be no rule making or legislation which would abrogate them- Miranda vs. Arizona 384 US 4336, 125:.
- E. The claim and exercise of a constitutional right can not be converted into a crime- Miller vs. Kansas 230 F2nd 48b, 487, 489.
- F. For a crime to exist there must be an injured party (delicit) there can be no sanction or penalty imposed on one because of this constitutional right - Sherer vs. Cullen 481. F. 945
- G. Want of jurisdiction may not be cured by consent of parties- industrial addiction association vs. C.I.R. 323. US 310, 313.
- H. There exists an inherently dangerous conflict of interest between the judges who work for Mullica Township Municipal Court Incorporated, prosecutors who work for Mullica Township Municipal Court Incorporated and police officers who work for Mullica Township Municipal Court Incorporated therefore respondent did not come with the doctrine of clean hands and are in want of personum jurisdiction .

The Clearfield doctrine is stare decisis upon its corporate rules unless it like any other corporation is "holder-in-due-course" of some contract or commercial agreement between it and the one on whom its demands for performance are made, and is willing to produce said document and to place the same into evidence before trying to enforce its demands. Governments descends to the level of a mere private citizen were private corporate commercial paper (federal reserve notes) and securities (checks) is concerned for purpose of suit such corporations and individuals are regarded as entirely separated from government see [Clearfield Trust company vs. United States, us 363-37/ (1942)

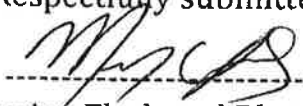
An exception to the rule of judicial jurisdiction and the Absence of jurisdiction. Were an act is done in clear absence of all jurisdiction and this is known to the judge there is no immunity see (Jonson vs. Mac coy, 278 F.2nd 37, 9th cir. 1960) see also Kenny vs Fox F.2nd, Rhodes vs Houston 202 Fed supp. 624)

Before a court can render a judgment it must have subject-matter jurisdiction and personal Jurisdiction , subject-matter jurisdiction is the power of the courts to entertain or adjudge the type of question involved in a case and not dependent upon the particular acts presented see (Thrasher VS. United States Liab Ins Co., 19 NY 2nd 159 , 166 , 225 , N.E. 2d 503 , 506 , 278 N.Y. S. 2 D , 793, 798 (1967).

Either party can move to dismiss an action on the grounds that the court does not have subject matter jurisdiction CPLR 3211 (a) (2) th or the court can take note of the lack of competence jurisdiction on its own volition , under HUTCHINSON vs STATE ind.477 N.E. 2 d 850,854, Fed. Evid.201 , and Court lacks , personam jurisdiction , and there is a Diversity of Citizenship issue in this matter, and this is Truly a Property dispute.

Requesting that the Constitution be enforced and the law of rights be upheld.

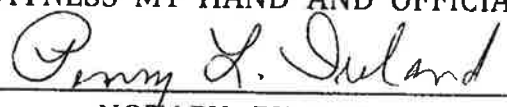
Respectfully submitted


Devine Flesh and Blood Being

JURAT

SUBSCRIBED AND AFFIRMED; On this 16 day of January, 2019 AD
Before me appeared Melvin K. Young known to me on the basis of
Satisfactory evidence to be the man whose name is subscribed on this
document .

WITNESS MY HAND AND OFFICIAL SEAL


NOTARY PUBLIC

PENNY L. IRELAND
NOTARY PUBLIC NEW JERSEY
My Commission Expires June 24, 2020

PENNY L. IRELAND
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires June 24, 2020

**STATE OF NEW JERSEY, ENS LEGIS
(MUNICIPAL COURT OF GALLOWAY)**

VS

) (Summons Numbers # E-102772,
) E-102773,

In Propria Persona, Sui Juris,

(Secured Party Creditor Beneficiary and **Natural Person**)

As Injured Third Party, Intervener and

AFFIDAVIT OF FACTS

BY SPECIFIC NEGATIVE AVERMENT
AND DENIAL OF CORPORATE
EXISTENCE

Counter Plaintiff

VS

**STATE OF NEW JERSEY, ENS LEGIS
“(MUNICIPAL COURT CITY OF GALLOWAY
As Counter Defendant**

_____ A verified plain statement of facts:

NOTICE OF AGENT IS NOTICE TO PRINCIPAL; NOTICE TO PRINCIPAL IS NOTICE TO AGENT

ACCEPTANCE OF FOREIGN STATUS

1. There is **no evidence** that Affiant is a UNITED STATES OF AMERICA INCORPORATED citizen, subject, Member, Officer, Trustee, Worker, Employee, Employer, vessel or " person" or any ens legis artificial entity , procedural phantom, legal fiction or Juristic personality.
2. Affiant has seen **no evidence** that affiant is not foreign to and without the UNITED STATES OF AMERICA IN-CORPORATED INTER-NATIONALITY, and believes that no such evidence exists.

1. There is **no evidence** that Affiant is a UNITED STATES OF AMERICA INCORPORATED citizen, subject, Member, Officer, Trustee, Worker, Employee, Employer, vessel or "person" or any ens legis artificial entity, procedural phantom, legal fiction or juristic personality.
2. Affiant has seen **no evidence** that Affiant is not foreign to and without the UNITED STATES OF AMERICA IN-CORPORATED INTER-NATIONALITY, and believes that no such evidence exists.
3. There is **no evidence** that Affiant has or is visiting, passing through, residing in, or is situated within the UNITED STATES OF AMERICA INCORPORATED INTERNATIONAL jurisdiction, nor has the ability to visit, reside in, pass through, or be situated within the UNITED STATES OF AMERICA INCORPORATED and INTERNATIONAL jurisdiction.
4. Affiant has seen **no evidence** that any party that would order, re-present or persuade Affiant to falsely present himself as a UNITED STATES OF AMERICA INCORPORATED/INTERNATIONAL citizen, vessel or person directly or by deception, device, misnomer, mistaken identity, warrant or indictment, real or imagined, will not be engaging in Enticement to Slavery, Perjury of Oath, assault on a Foreign Official and a violation of the Convention de La Haye du 5 October 1961 ("Hague Convention"), and believes that **no such evidence exists**.
5. As an official of a sovereign foreign jurisdiction, Affiant denies having ever knowingly sworn allegiance to or volunteered to submit to the UNITED STATES OF AMERICA INCORPORATED, its agents or political subdivisions, or any jurisdiction foreign to Affiant (i.e. common law, natural law, divine law, and the American Constitutional Laws).
6. There is no evidence that Affiant has at any time knowingly, willingly and intentionally sworn allegiance to or volunteered to submit by statute, contract or other device to the UNITED STATES OF AMERICA, its agents and political subdivision(s), or any jurisdiction foreign to Affiant.
For purposes of this affidavit and attached process, if in any, the terms "UNITED STATES OF AMERICA" "STATE OF NEW JERSEY" "ATLANTIC COUNTY" or any derivation thereof refers to the corporation, and all agents, employees, subdivisions and representatives thereof, without any implied submission to the UNITED STATES OF AMERICA, "STATE OF NEW JERSEY" "ATLANTIC COUNTY" or such private CORPORATE STATUTES, CODES, REGULATIONS, ACTS, ORDINANCES and RULES.
7. **Affiant denies that** the use of a notary public, Federal Reserve Promissory Notes, or any other public facilities, when alternatives are generally unavailable, comprises Affiant's submission to any political jurisdiction contrary to his Declaration of Political Status, the creation of an adhesion contract expressly or tacitly with the UNITED STATES OF AMERICA or any other party real or imagined, or an appearance before any body or tribunal, administrative or judicial, real or imagined. RIGHTS, REMEDIES, JURISDICTION.
8. Affiant has seen **no evidence** of a defect in the definition of the UNITED STATES OF AMERICA as a corporation, and believes that no such evidence exists.

9. There is **no evidence** that Affiant waives, has waived, or intends to waive any rights, remedies or defenses including, without limitation, the defense of want for in rem and in personam.
10. There is **no evidence** that Affiant is liable on any Government statutes or codes, including, without limitation, UNITED STATES OF AMERICA Codes and statutes and codes of any of Respondents' political subdivisions.

IN PERSONAM

11. **There is no evidence** that a fictional corporation can secure in personam jurisdiction regarding Affiant, a living man, without a voluntary election to submit.
12. **Affiant denies** that Affiants' use of private letters rogatory, notices and affidavits comprises an appearance or submission to any jurisdiction foreign to Affiant.
13. **There is no evidence** that Affiants' use of private letters rogatory, notices and affidavits comprises an appearance or submission to any jurisdiction foreign to Affiant.
14. **There is no evidence** that distress, restraint, injury, incarceration or distraint of any type pursuant to an assumption of in personam jurisdiction where none exists does not comprise a theft within the special maritime jurisdiction, assault, battery, fraud, perjury of oath, insurrection, plunder, kidnapping, assault on a foreign official, and other high crimes against mankind.
15. **There is no evidence** that Affiant, Affiant's property and/or interests are subject to the jurisdiction of any of Respondents' officers or agents.

IN REM

16. **There is no evidence** that the UNITED STATES OF AMERICA has not stipulated that legal fiction (Melvin Young),(Young Melvin),(MELVIN YOUNG),(YOUNG MELVIN)(Trademark and Copy written CORPORATE LEGALLY FICTION NAME) or any orthographic variations thereof is an artificial juristic personality created by the UNITED STATES OF AMERICA INCORPORATED/INTERNATIONAL and therefore inherently **without the ability to appear before any court.**
17. **As the law does not permit impossibilities, Affiant denies** having authority or ability to produce legal fiction (Melvin Young),(Young Melvin),(MELVIN YOUNG),(YOUNG MELVIN) or any orthographic variations thereof for an appearance before any UNITED STATES OF AMERICA INC. tribunal.
18. **There is no evidence** that Affiant possesses authority or ability to produce legal fiction (Melvin Young),(Young Melvin),(MELVIN YOUNG),(YOUNG MELVIN) or any orthographic variations thereof for an appearance before any UNITED STATES OF AMERICA INC. tribunal.
19. Absent a vessel subject to seizure, **Affiant denies the existence of a Court in vacuo other than mala fide on a mare clausum.**
20. **Affiant has seen no evidence** that in the absence of a vessel subject to seizure, a Court in Admiralty can exist, and believes that no such evidence exists.
21. Legal fiction (Melvin Young),(Young Melvin),(MELVIN YOUNG),(YOUNG MELVIN) or any orthographic variations thereof lacking sentence, is unable to self-execute a contract with Respondents, and **no such contracts exist.**

22. **Affiant denies having received full disclosure** of the benefits and liabilities associated with the creation of legal fiction (Melvin Young),(Young Melvin),(MELVIN YOUNG),(YOUNG MELVIN) or any orthographic variations thereof.

23. **There is no evidence** that the UNITED STATES OF AMERICA provided to Affiant full disclosure of the benefits and liabilities associated with the creation of legal fiction (Melvin Young),(Young Melvin),(MELVIN YOUNG),(YOUNG MELVIN) or any orthographic variations thereof

24. **In the absence of such disclosure, there is no evidence** that the UNITED STATES OF AMERICA was not and does not necessarily remain the trustee and liable party for all actions and liabilities attributed to legal fiction (Melvin Young),(Young Melvin),(MELVIN YOUNG),(YOUNG MELVIN) or any orthographic variations thereof as an operation of law.

25. **There is no evidence** that failure to rebut this Affidavit point-by-point or exhibit a power of attorney authorizing Respondents to verify or disqualify Affiant's Declaration of Political Status within three (3) days (in accordance with the "Truth and Lending Act") of this date will not comprise Respondents' confession to enticement to slavery.

26. In the event Respondents jointly or severally impair Affiant or Affiant's interests, freedom or Claim against legal fiction (Melvin Young),(Young Melvin),(MELVIN YOUNG),(YOUNG MELVIN) or any orthographic variations thereof, **there is no evidence** that failure to rebut this Affidavit point-by-point or exhibit a power of attorney within three (3) days of this date authorizing Respondents to verify or disqualify Affiant's Declaration of Political Status will not comprise Respondents' confession to theft within the special maritime jurisdiction, assault, battery, fraud, perjury of oath, insurrection, plunder, kidnapping, embezzlement, treason, extortion, assault on a foreign official, and other high crimes against mankind.

FOREIGN RELATIONS

27. Affiant has **seen no evidence** that the UNITED STATES OF AMERICA, a corporate body politic, has a circumscribed geographic boundary, which has been published and registered for public notice.

28. **Affiant denies being an enemy** of the UNITED STATES OF AMERICA, at war with the UNITED STATES OF AMERICA, engaging in insurrection against the UNITED STATES OF AMERICA, or belligerent to the UNITED STATES OF AMERICA

29. **There is no evidence** that Affiant is an enemy of the UNITED STATES OF AMERICA, at war with the UNITED STATES OF AMERICA, engaging in insurrection against the UNITED STATES OF AMERICA, or belligerent to the UNITED STATES OF AMERICA.

30. **Affiant denies liability** to or for any Government statutes or codes, including, without limitation, statutes and codes of any of Respondents' political subdivisions.

31. **Affiant has seen no evidence** that MELVIN YOUNG or YOUNG MELVIN or any orthographic variations thereof a fictional corporate entity for profit and gain, exists, and believes that no such evidence exists.

32. **Affiant has seen no evidence** of the existence of the Offer, and believes that no such

evidence exists. OFFERS AND CLAIMS.

33. **There is no evidence** that the information or indictment in Case No. E-102772 ,E-102773("Offer") does not comprise an offer to create/expand funds under public policy and a negotiable instrument upon acceptance.
34. **There is no evidence that the Offer** and Affiant's acceptance thereof do not comprise a Settlement Agreement ("Agreement") between the presenter and acceptor.
35. **There is no evidence** that the Agreement will not prevent waste of public funds, and that dishonor of same would not comprise a willful waste of public resources.

DEFAULT STIPULATIONS

36. **There is no evidence** that notary certification of Respondents' default did not comprise Respondents' stipulation that no facts are in dispute and no controversy exists in the above-noted matter.
37. **There is no evidence** that upon notary certification of Respondents' default, Respondent is not estopped as an operation of law from any and all further judicial or administrative actions in this matter against Affiant's property, collateral, interests and/or freedom.
38. **There is no evidence** that upon notary certification of Respondents' default, Respondents did not waive in perpetuity all rights, remedies and defenses in and at law, equity, commerce and admiralty regarding the above-referenced matter and consequential actions which may be brought to cure Respondents' commercial dishonors and/or actions undertaken outside the opposite bond/oath of office, such waiver of rights to include, without limitation, waiver of the right to argue, raise a controversy or initiate litigation or arbitration in any venue or jurisdiction foreign or domestic against Affiant or Affiant's interests, property or freedom.
39. **There is no evidence** that notary certification of Respondents' default did not comprise Respondents' agreement to the filing of such consequential actions, judicial or administrative, as Affiant may deem necessary to purge Respondents' liabilities.
40. **There is no evidence** that notary certification of Respondents' default does not comprise as an operation of law Respondents' stipulation jointly and severally to the facts and confessions listed on all notices and Schedules annexed hereto.

DENIAL OF ASSUMPTIONS

41. **Affiant denies the existence of any contracts, express or implied, between Affiant and Respondent or any other party, real or pretended, in this matter. There is no evidence of the existence of any such agreements express or implied.**
42. **Affiant denies that Affiant and legal fiction MELVIN YOUNG , or any orthographic variations thereof are co-business partners. There is no evidence that Affiant and legal fiction (Melvin Young),(Young Melvin),(MELVIN YOUNG), (YOUNG MELVIN) or any orthographic variations thereof are co-business partners.**
43. **Affiant denies being a surety for legal fiction MELVIN YOUNG, YOUNG MELVIN or any orthographic variations thereof. There is no evidence that Affiant is a surety for legal fiction, (Melvin Young),(Young Melvin),(MELVIN YOUNG),(YOUNG MELVIN) or any orthographic variations thereof.**

44. **Affiant denies serving as trustee for any foreign situs or constructive trust**, in particular for legal fiction (Melvin Young),(Young Melvin),(MELVIN YOUNG), (YOUNG MELVIN) or any orthographic variations thereof. There is no evidence that Affiant serves as trustee in any foreign situs or constructive trust.
45. **Affiant denies being, acting as, or being capable of being a "citizen," "resident," "individual," "resident individual," "nonresident individual," "part-year resident individual," "part-year resident trust," "resident estate," resident trust," "nonresident estate," "nonresident trust," "person," or "qualified taxpayer" of or relative to the UNITED STATES OF AMERICA, US, the STATE OF NEW JERSEY ATLANTIC COUNTY or any corporate jurisdiction or Government entity or political subdivision. There is no evidence that Affiant is capable of being any of the aforementioned legal fiction entities.**
46. **Affiant denies engaging in the conduct of a trade or business in the UNITED STATES OF AMERICA, US, STATE OF NEW JERSEY, ATLANTIC COUNTY or any Government entity or political subdivision. There is no evidence that Affiant engages in the conduct of a trade or business in any of the aforementioned locations.**
47. **There is no evidence that Affiant is a UNITED STATES OF AMERICA vessel either documented or undocumented.**
48. **Affiant denies involvement with Federal Reserve Promissory Notes, interstate banking, or any benefit or privilege involving the discharge of debt under public policy.**
- 49 **There is no evidence that Affiant is involved with Federal Reserve Promissory Notes, interstate banking, or any benefit or privilege involving the discharge of debt under public policy.**
- 50 **Affiant denies the right of any party to impair Affiant's private contracts.** There is no evidence of the right of any party to impair Affiant's private contracts without such party confessing to Enticement to Slavery and Theft within the Special Maritime Jurisdiction.
51. **There is no evidence contravening the maxim of law that silence comprises agreement in commerce, equity, admiralty, Lex Mercatoria and public policy.**
52. **There is no evidence contravening the maxim of law that an affidavit stands as truth in commerce, equity, admiralty, Lex Mercatoria and public policy unless rebutted point-by-point by an Affidavit which is sworn to the same degree of commercial risk.**
53. **There is no evidence that an answer indicating "NA," "not applicable," "inapposite" or similar dishonors, or failure to answer any point herein would not be unresponsive and comprise stipulation to all facts in this affidavit pursuant to the maxim that silence comprises agreement.**
- 54 **There is no evidence that failure to respond to this Verified Affidavit of Facts point-by-point will not comprise Respondents' confession affirmed to all terms and statements herein.**
55. **All words herein are as Affiant defines them.** The contents of all boxes herein are included in their entirety by reference. No text within the said boxes shall be excluded by convention or otherwise. As a free, sovereign, living, flesh-and-blood inhabitant on the land in undiminished capacity and full standing in law, the Undersigned executes and

provides herewith to Respondent the following affidavit that Respondent must execute, in red or blue ink and notarized, and return to the Undersigned within three (3) days or be in default thereof: a. **Affidavit of Specific Negative Averment**; In order to satisfy the rules of bona fide commerce and be of any force, effect, and credibility, any communication of any kind received by the Undersigned re this matter by Respondent and any other party, hereinafter jointly and severally referenced as "Offeror," must be executed under affidavit certified and sworn true, correct, and complete with full personal and commercial responsibility for the truth, accuracy, relevance, and verifiability of everything Offeror alleges, with the following documents attached in support of said affidavit: b. **Copy of Offeror's insurance policy and bond of office**, proving the existence of Offeror's commercial liability and the extents thereof and providing all details required to identify the underwriter of the bond and all criteria needed to file a claim against said bond. c. **Duly executed Bill of Peace**, bearing original signature in red or blue ink and notarized, contractually agreeing the Offeror is not committing an act of war by acting in any manner against the Undersigned re Offer. d. **Proof that all relevant corporate entities** enumerated in the Undersigned's Affidavit of Specific Negative Averment **exists, are solvent, and possess capacity to sue and be sued**. e. **Proof of Offeror's bona fide authority** and bonding to act as a third-part debt collector re this matter.

f. **Proof that the undefined and unproved all-capital-letter being/entity/person/corporation /whatever, i.e. Trade Name, exists** and Offeror holds bona fide claim thereon **superior to claim of the Undersigned**. Failure by Offeror to comply with each and every demand set forth above establishes **on the record Offeror's confession and consent of judgment that Offeror is:**

g. **Acting without commercial liability** and thereby in an **ultra vires** manner in private, unlimited-liability capacity and can be sued accordingly.

h. **Committing treason** and engaging in war against the Undersigned, the United States of America and the people, relieving the Undersigned of all obligations to transact any commercial business with Offeror, a Self- proclaimed enemy, in accordance with the criteria set forth.

i. **Acting in private capacity** outside of all bona fide corporate authority.

j. **Acting without authority** and bonding and therefore in an **ultra vires, private capacity, and can be sued or prosecuted accordingly**.

k. **Acting against Trade Name, i.e. an other wise non-existent and unproved being/entity/person/corporation/whatever, on which neither Offeror nor Offeror's Agency holds bona fide and verifiable claim superior** to established claim of the Undersigned.

If not rebutted within 10

DAYS by lawful evidence to the contrary, this affidavit is at law evidence that **the court has not joined the true party of interest and a default exists**. Failure to present evidence to the contrary of the Affiants testimony, will be evidence that all parties stipulate to the facts herein as true, correct and complete. **Aggrieved Defendant objects to the martial law war powers summary judgment of this court** and lack of due process and **I reserve all my rights under the common law and I do not voluntarily waive any rights**. Wherefore Affiant moves the court to dismiss With Prejudice all

executed under affidavit certified and sworn true, correct, and complete with full personal and commercial responsibility for the truth, accuracy, relevance, and verifiability of everything Offeror alleges, with the following documents attached in support of said affidavit: b. **Copy of Offeror's insurance policy and bond of office**, proving the existence of Offeror's commercial liability and the extents thereof and providing all details required to identify the underwriter of the bond and all criteria needed to file a claim against said bond. c. **Duly executed Bill of Peace**,

bearing original signature in red or blue ink and notarized, contractually agreeing the Offeror is not committing an act of war by acting in any manner against the Undersigned re Offer. d. **Proof that all relevant corporate entities enumerated in the Undersigned's Affidavit of Specific Negative Averment exists, are solvent, and possess capacity to sue and be sued.** e. **Proof of Offeror's bona fide authority and bonding to act as a third-part debt collector re this matter.**

f. **Proof that the undefined and unproved all-capital-letter being/entity/person/corporation /whatever, i.e. Trade Name, exists and Offeror holds bona fide claim thereon superior to claim of the Undersigned.** Failure by Offeror to comply with each and every demand set forth above establishes on the record Offeror's confession and consent of judgment that Offeror is:

g. **Acting without commercial liability** and thereby in an **ultra vires** manner in private, unlimited-liability capacity and can be sued accordingly.

h. **Committing treason and engaging in war against the Undersigned, the United States of America and the people, relieving the Undersigned of all obligations to transact any commercial business with Offeror, a Self- proclaimed enemy, in accordance with the criteria set forth:**

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If not rebutted within 10

DAYS by lawful evidence to the contrary, this affidavit is at law evidence that **the court has not joined the true party of interest and a default exists.** Failure to present evidence to the contrary of the Affiant's testimony, will be evidence that all parties stipulate to the facts herein as true, correct and complete. **Aggrieved Defendant objects to the martial law war powers summary judgment of this court and lack of due process and I reserve all my rights under the common law and I do not voluntarily waive any rights.** Wherefore Affiant moves the court to dismiss With Prejudice all allegations for lack of jurisdiction, consent, and contract, in the matter before the court.

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COMMERCIAL AFFIDAVIT OATH AND VERIFICATION

"I, (MELVIN): of the (YOUNG) family, In Propria Persona, Sui Juris, a natural common law man, on my own unlimited commercial liability, certify that I have read the above affidavit of facts by specific negative averment and denial of corporate existence and do know that the facts contained therein are to the best of my knowledge true, correct and complete, not misleading, the truth, the whole truth and nothing but the truth." Signed this day of 2018.

L.S. M. Young

(MELVIN); of the (YOUNG) family, In Propria Persona

Sui Juris Autograph: by Special Limited Appearance,

In Rerum Natura, All Rights Exclusively Reserved.

Without Prejudice UCC 1-207 & 1-308.

Real party in interest under injury.

Use of a Notary or Commissioner of Affidavits is for attestation and verification purposes only and does not constitute a change in status or entrance or acceptance of foreign jurisdiction.

JURAT/ACKNOWLEDGMENT

For verification purposes only On this day and date of A.D. , Principal did personally appear before me, is known to be the natural man operating in the requisite capacity for signature described herein, who executed the foregoing, acknowledged the contents thereof; and executed the same as his/her free will act and deed.

Subscribed and agreed to before the undersigned; Witnessed by my hand and official seal,

Audrey Hart
Notary name PRINTED

Audrey Hart
Notary Signature Seal/Stamp



State Of New Jersey)

Atlantic County)

AFFIDAVIT OF TRUTH AND FACT

1. I MELVIN YOUNG Being of sound mind state these facts and know them to be True correct and not misleading .
2. I gave Tahliyah Gaskins a ride in my car on April 7, 2018 to Galloway Township to Liberty Motel on White Horse Pike .
3. I dropped her off and proceeded to return home , the Police pulled me over minutes after dropping her off, for they say improper lane change.
4. They asked for my license and registration ,I gave them my registration and cooperated with, them ,then they asked if they could search my car , an I replied yes because I didn't have anything to hide
5. The Police found on the back seat in plain site about 6 or 7 bags some empty some with powder in them.
6. The person who was in the back seat was Tahliyah Gaskins , and she is willing to own up to her property which are those bags of powder that belongs to her ,and she is admitting that the bags of powder that was found in my back seat were hers and that I had no knowledge of them.

RESEPECTFULLY SUBMITTED

BY

DATE

Tahliyah Gaskins

JURAT

WITNESS MY HAND AND OFFICIAL SEAL

[Signature]
NOTARY PUBLIC

DATE

