

Andreina Gonzalez

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BOROUGH OF PARAMUS

2025 MAY 22 P 4: 24

CLERKS OF FISCAL

Date: 05/22/2025

To:

Chief of Police

Paramus Police Department

1 Carlough Drive

Paramus, NJ 07652

Notice of Intent to Sue – Civil Rights Violations, Failure to Accommodate Disability, and Misconduct While in Custody

Dear Chief ,

This letter serves as formal notice of my intent to file a lawsuit against the Paramus Police Department, Officer Sampson, and any other involved parties regarding a series of unlawful and discriminatory actions taken against me, a disabled individual, in violation of both state and federal law.

Over the course of several months, I have made multiple good-faith requests for disability accommodations to which I am legally entitled under Title II of the Americans with Disabilities Act (ADA); 42 U.S.C. § 12131 et seq. My requests were repeatedly ignored, dismissed, or deliberately silenced. The failure to provide reasonable accommodations constitutes a direct violation of my civil rights as protected under the ADA and Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794).

In addition to the denial of accommodations, I was subjected to harassment, emotional abuse, and physical harm. On or around April 3, 2025, I was wrongfully detained and forcibly taken to a hospital against my will, where I remained for five days under what amounted to unlawful police custody. During this time:

- Officer Sampson mocked me, flipped his middle finger, and laughed at me, causing immense humiliation.
- I was physically attacked while in custody, sustaining injuries and trauma.
- I was not read my Miranda rights nor informed of my rights as a person with disabilities.
- I was emotionally and psychologically manipulated in a coordinated effort that left me traumatized.

The actions taken against me constitute clear violations of my constitutional rights under the Fourth Amendment (protection against unreasonable seizure), the Fourteenth Amendment (due process and equal protection), and statutes governing official misconduct while in police custody, including N.J.S.A. 2C:30-2, which prohibits public officials from knowingly refraining from performing a duty imposed by law, including respecting civil rights.

I believe these actions were not isolated incidents but part of a collective effort to silence and harm me as a disabled person advocating for herself. I am now suffering ongoing emotional distress, trauma, physical pain, property damage, and irreparable loss of dignity and peace of mind.

Accordingly, I am seeking compensation in the amount of \$280,000 for:

- Denial of federally protected disability accommodations
- Emotional distress and psychological trauma
- Physical harm and hospitalization
- Misconduct by law enforcement officers while in custody
- Violations of civil and constitutional rights

If the Paramus Police Department or the appropriate municipal authority wishes to resolve this matter without litigation, please respond in writing no later than 30 days. If no response is received, I will proceed with filing a formal civil lawsuit seeking full legal relief, including punitive damages and attorney's fees.

Sincerely,

Andreina Gonzalez

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(201-679-3486)
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Andreina Gonzalez



**BOROUGH OF PARAMUS
POLICE DEPARTMENT**

1 Carlough Drive
Paramus, New Jersey 07652-3774
201-262-3400 Fax 201-649-0406



**ROBERT M. GUIDETTI
CHIEF OF POLICE**

**FRANK S. SCOTT IV
DEPUTY CHIEF OF POLICE**

March 10, 2025

Andrea Gonzalez
377 Veronica Ct.
Paramus, NJ 07652

Dear Ms. Gonzalez,

The Internal Affairs Unit of the Paramus Police Department has completed its investigation of your complaint about Officer C. Sampson "flipping you off" at New Bridge Medical Center.

The investigation and review of all the information available to this office revealed your complaint is Sustained. Officer Sampson will be disciplined according to department policy and procedure.

Thank you for bringing this matter to our attention.

Respectfully,

[Signature] #410

Lt. Kelly # 410
Office of Professional Standards
Internal Affairs Unit