

The Law Offices of

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John J. Zidziunas, Esq. °

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*Nicole M. Grzeskowiak, Esq. ***

Of Counsel:

Dennis O. Dowd, Esq. °

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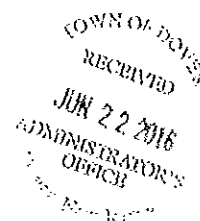
**Member of NY Bar*

°Member of NJ Bar

June 22, 2016

Via Hand Delivery DC Express

Office of the Municipal Clerk
Town of Dover
37 N. Sussex Street
Dover, NJ 07801



Re: Francis J. Coppinger, Jr. v. Town of Dover, et al.
Docket No.: N/A
Our File No.: 703-149

Dear Sir/Madam:

This office represents Plaintiff, Francis J. Coppinger, Jr., in the above-captioned matter. Pursuant to Title 59, enclosed please find the Notice of Claim for Damages in connection with his claims against the Town of Dover and various public entity officials.

Kindly acknowledge each of these claims at your earliest opportunity. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "John J. Zidziunas".

JOHN J. ZIDZIUNAS
For the Firm

Encl.



NOTICE OF CLAIM FOR DAMAGES AGAINST THE TOWN OF DOVER

FOR AND TO: OFFICE OF THE MUNICIPAL CLERK
TOWN OF DOVER
37 N. SUSSEX STREET
DOVER, NJ 07081

JUN 22 2016
CLERK OF SUPERIOR COURT
DOVER, NJ

June 22, 2016

PURSUANT TO N.J.S.A. 59:8-3 ET SEQ., THIS IS A CLAIM FOR DAMAGES
THAT HAS BEEN FILED WITHIN (90) DAYS OF THE OCCURRENCE THAT
GAVE RISE TO THE WITHIN CLAIM

Pursuant to N.J.S.A. 59:8-4 et seq., please be advised of the following
information:

A) CLAIMANT'S INFORMATION: Francis J. Coppinger, Jr.

<u>Present/Ongoing</u> DATE OF INCIDENT	<u>See Section F</u> AMOUNT OF CLAIM
<u>Francis J., Coppinger, Jr.</u> LAST NAME, FIRST, MIDDLE	<u>3/14/68</u> DATE OF BIRTH
<u>14 Bent Street, Kenvil, NJ 07847</u> CURRENT POST OFFICE ADDRESS	<u>Same</u> MAILING ADDRESS
<u>14 Bent Street, Kenvil, NJ 07847</u> CITY, STATE, ZIP CODE	<u>[REDACTED]</u> SOCIAL SECURITY NUMBER
<u>Married</u> MARITAL STATUS	<u>1</u> NUMBER OF DEPENDENTS
<u>[REDACTED]</u> HOME PHONE NUMBER	<u>973-366-2200</u> WORK PHONE NUMBER

B) **POST OFFICE ADDRESS OF PERSON PRESENTING THE CLAIM
DESIRES NOTICE TO BE SENT TO THE FOLLOWING:**

John J. Zidziunas, Esq.
John J. Zidziunas & Associates
33 Plymouth Street, Suite 202A
Montclair, New Jersey 07042

Relationship to Claimant: Attorney-at-law

C) **CIRCUMSTANCES THAT GAVE RISE TO THE WITHIN CLAIM:**

Date: Present/Ongoing
Time: Present
Municipality: Dover, NJ
Exact Location of Occurrence: Dover Police Department,
37 N. Sussex Street, Dover, NJ 07081

Brief Description:

Frank Coppinger is a decorated police officer with the Town of Dover Police Department since 1993. As a result of his exemplary performance, he was promoted from Police Officer to Sergeant in 2001, promoted to Lieutenant in 2007, and promoted again to Officer in Charge ("OIC") in 2015. During that time, Coppinger was closely associated with former Police Chief Valentine in both a familial capacity as his cousin and professional capacity, and openly demonstrated his free speech support of Chief Valentine for his political activities and actions as Chief of Police. Because of his open support, however, Coppinger was subjected to harassment and retaliation in violation of numerous state and federal laws.

Defendants, Dodd and Travisano, vehemently opposed Chief Valentine's political actions and sought to retaliate against Valentine and suspend him, which Coppinger openly objected to and disclosed as illegal/unethical/immoral activities in contravention of N.J.S.A. 34:19-1 for not having a valid legal basis to cause such suspension. Because of Coppinger's open objections and disclosures regarding Defendants' illegal actions, and Coppinger's close political affiliation and free speech in support of Chief Valentine, Defendants took numerous

retaliatory actions against Coppinger. Further, Defendants retaliated against Coppinger for Coppinger's open refusal to commit an illegal/unethical/immoral act in refusing Defendant Travisano's request to violate HIPAA laws by delivering documents and information to him concerning [REDACTED] private medical information and fitness for duty evaluations to Internal Affairs. Under New Jersey law, Coppinger expressed that he was precluded from turning over such confidential materials to Defendant Travisano because Travisano was not a member of law enforcement. As a consequence for this activity as well as the other activities set forth herein, Defendants retaliated against Coppinger and took adverse actions against him by demoting him down to Desk Lieutenant from OIC, moving his physical office location, requiring him to go back to wearing a police uniform, adversely changing his shift schedule, and stripping him of his opportunities to earn overtime pay as he did in the past. By not restoring Coppinger to the OIC position that he once held, Defendants continue to violate Coppinger's civil rights and State and Local Ordinance laws (N.J.S.A. 40A:14-118) for the Dover Police Department's actions in maintaining Anthony Smith as the current OIC due to his improper ranking below Coppinger. Moreover, Defendants have derailed Coppinger's career track and severely impacted his pension and retirement benefits, thus causing him further economic damages.

As a consequence of Defendants' illegal actions, Coppinger suffers from significant economic damages as well as serious emotional and physical damages which were proximately caused by Defendants' actions.

D) DESCRIPTION OF INJURIES:

Mr. Coppinger's injuries and losses are unknown and unquantifiable at this time. (See Part F)

**E) NAMES OF ADDRESSES OF PUBLIC ENTITY AND PUBLIC
EMPLOYEES CAUSING DAMAGES:**

Town of Dover, Dover Police Department
37 N. Sussex Street
Dover, NJ 07801

Mayor James Dodd
Town of Dover
37 N. Sussex Street
Dover, NJ 07801

Donald Travisano
Town Administrator
Town of Dover
37 N. Sussex Street
Dover, NJ 07801

Individual Officers whose identities are currently unknown,
but will be determined throughout the course of discovery
Town of Dover, Dover Police Department
7 N. Warren Street
Dover, NJ 07081

**F) THE AMOUNT CLAIMED AS OF THE DATE OF THIS PRESENTATION
OF CLAIM:**

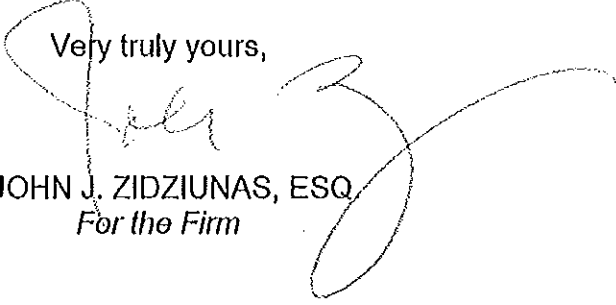
Although Mr. Coppinger's damages remain unquantifiable at this time, it is estimated Mr. Coppinger's emotional distress damages are in excess of \$1,000,000.

Mr. Coppinger has and will continue to suffer serious and/or permanent physical and/or emotional distress damages as a direct result of the malicious, willful and grossly negligent actions, and continual, severe and pervasive acts, customs, and policies of the aforementioned public entity parties.

COMPLIANCE WITH N.J.S.A. 59:8-5:

On behalf of the Claimant, Francis J. Coppinger, this Claim was timely filed with all parties.

Very truly yours,


JOHN J. ZIDZIUNAS, ESQ.
For the Firm