

Khajezadeh, Dina

From: John@johnreillylaw.com
Sent: Monday, December 7, 2020 2:05 PM
To: Maria Derosé; Toscano, Taylor
Cc: Brianna Sandroni; Christopher Diller; Alicia Cook; Jennifer Cosentino
Subject: RE: [External]RE: hone motion to revoke release
Attachments: Hone adv. State, Case No. 20000532, Defendant's 12-7-2020 Supplemental Letter Memorandum.pdf; Hone adv. State, Case No. 20000532, Defendant's Attorney's 12-7-2020 Supplemental Cert..pdf; Hone adv. State, Case No. 20000532, Defendant's Exhibit EE.pdf; Hone adv. State, Case No. 20000532, Defendant's Exhibit FF.pdf; Hone adv. State, Case No. 20000532, Defendant's Exhibit GG.pdf

Dear All,

As to the pending motions, please note that I anticipate the filing of a written request that same be adjourned later this afternoon.

In the meantime, as at least for now same remain scheduled for tomorrow, please see upon defendant's motions for change of venue and disqualification of the O.C. Prosecutor from further prosecution, the attached forms of supplemental letter memorandum, attorney's cert. and exhibits EE through GG (additional exhibits to follow due to volume) e-filed this date.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: [External]RE: hone motion to revoke release
From: Maria Derosé <Maria.Derosé@njcourts.gov>
Date: Thu, December 03, 2020 9:52 am
To: "John@johnreillylaw.com" <John@johnreillylaw.com>, "TToscano@co.ocean.nj.us" <TToscano@co.ocean.nj.us>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>, Christopher Diller <christopher.diller@njcourts.gov>, Alicia Cook <alicia.cook@njcourts.gov>, Jennifer Cosentino <jennifer.cosentino@njcourts.gov>

Hi Everyone,

Judge Baxter will hear the Change of Venue & Disqualification of OC Pros Office motions on 12/8, at 3:30pm via Zoom. Pending the outcome of those motions before Judge Baxter, the motion to revoke release will tentatively be scheduled before Judge Collins for 12/9, at 1:30pm via Zoom. If the motions are granted by Judge Baxter, the motion to revoke release will subsequently be scheduled for a date and time to be determined by the transfer county.

All parties are expected to attend the motions. As they are being heard via Zoom any unavailability for the motions will need to be put in writing for Judges review.

Maria

From: John@johnreillylaw.com <John@johnreillylaw.com>
Sent: Wednesday, December 2, 2020 3:10 PM
To: TToscano@co.ocean.nj.us; Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>; Christopher Diller <christopher.diller@njcourts.gov>
Subject: [External]RE: hone motion to revoke release

CAUTION: This email originated from outside the Judiciary organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear All,

As to Ms. Toscano's below, I see no evidence that defendant "makes himself unavailable" as a delay tactic or otherwise and simply cannot bring myself to again go down that same rabbit hole seeking demanded proofs as marked my effort upon the State's motion to revoke, one as only resulted in the State's continued dogged refusal to withdraw same.

For everyone's information, I will be out of the office on a personal matter tomorrow and likely Friday, during which I will likely not be reviewing/responding to any additional emails on this matter. However, I will with certainty be returning Monday, hopefully to find that the subject motions have been adjourned as I have requested, or if not, to rejoin the effort.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: hone motion to revoke release

From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>

Date: Wed, December 02, 2020 2:18 pm

To: "John@johnreillylaw.com" <John@johnreillylaw.com>, Maria Derosé <Maria.Derosé@njcourts.gov>

Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>, Christopher Diller <christopher.diller@njcourts.gov>

Mr. Reilly,

Please provide some sort of proof showing that the defendant is not available. It is my understanding he is unemployed, so this seems like a delay tactic. At some point these motions need to be heard and Mr. Hone makes himself unavailable without sufficient proof often.

Thank you,
Taylor



Taylor Toscano
Assistant Prosecutor
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2741
Email: ttoscano@co.ocean.nj.us

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FOR OFFICIAL USE ONLY - LAW ENFORCEMENT SENSITIVE

From: John@johnreillylaw.com <John@johnreillylaw.com>
Sent: Wednesday, December 2, 2020 1:58 PM
To: Toscano, Taylor <TToscano@co.ocean.nj.us>; Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>; Christopher Diller <christopher.diller@njcourts.gov>
Subject: RE: hone motion to revoke release

Dear All,

I too would have no problem with Judge Collins being assigned this matter for all proceedings going forward, but before the back and forth on this goes any further, please note that I am advised that the defendant is not available on either the 9th or the 10th and that he does not waive his appearance for any hearings or conferences on this matter.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: hone motion to revoke release
From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>
Date: Wed, December 02, 2020 1:34 pm
To: "John@johnreillylaw.com" <John@johnreillylaw.com>, Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>, Christopher Diller <christopher.diller@njcourts.gov>

I'd be happy to argue all pending issues before Judge Collins if the Court deems appropriate.

Thank you,
Taylor



Taylor Toscano
Assistant Prosecutor
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2741
Email: ttoscano@co.ocean.nj.us

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FOR OFFICIAL USE ONLY - LAW ENFORCEMENT SENSITIVE

From: John@johnreillylaw.com <John@johnreillylaw.com>
Sent: Wednesday, December 2, 2020 1:30 PM
To: Toscano, Taylor <TToscano@co.ocean.nj.us>; Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>; Christopher Diller <christopher.diller@njcourts.gov>
Subject: RE: hone motion to revoke release

Dear Maria,

For the reasons set forth in the pleadings filed upon same, the State's motion to revoke defendant's release (State's motion to revoke), one as has proven to be entirely without merit, should properly be either voluntarily withdrawn by the State or dismissed by the Court *sua sponte*.

Failing same, for the reasons previously stated, the State's motion to revoke must not proceed to hearing until defendant's motions for Change of Venue out of Ocean County and Disqualification of the Ocean County Prosecutor's Office from further prosecution of this matter (defendant's motions), those as founded in such previously displayed/apparent bias as described in the pleading papers filed to date, have been decided.

The record upon defendant's motions must be supplemented with reference to subsequent/ongoing events, including the State's now apparent refusal to withdraw its now as-proven baseless motion to revoke defendant's release.

Defendant has itemized in detail his packed agenda for his business trip to Arizona beginning on 12/14/2020 such as would render any requirement that hearing upon defendant's motions proceed during same as being, if not implausible, at the very least unfair.

Therefore, I once again ask that all motions be adjourned to dates in January, with defendant's motions, as supplemented, to proceed to hearing first, and only if same are denied (and assuming the State's motion to revoke be not by then withdrawn or dismissed) to only then to be followed by hearing upon the State's motion to revoke.

Please advise upon the above via reply e-mail.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: Hone motion to revoke release

From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>

Date: Wed, December 02, 2020 11:35 am

To: Maria Derosé <Maria.Derosé@njcourts.gov>, "John Reilly
(John@johnreillylaw.com)" <John@johnreillylaw.com>

Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>, Christopher
Diller
<christopher.diller@njcourts.gov>

Hi Maria,

I am available either day. Thank you!

Taylor



Taylor Toscano
Assistant Prosecutor
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2741
Email: ttoscano@co.ocean.nj.us

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FOR OFFICIAL USE ONLY - LAW ENFORCEMENT SENSITIVE

From: Maria Derosé <Maria.Derosé@njcourts.gov>

Sent: Wednesday, December 2, 2020 11:33 AM

To: Toscano, Taylor <TToscano@co.ocean.nj.us>; John Reilly
(John@johnreillylaw.com) <John@johnreillylaw.com>

Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>;
Christopher Diller <christopher.diller@njcourts.gov>

Subject: Hone motion to revoke release

Hi Taylor & John,

Judge Collins has been assigned to handle the motion to revoke release filed by the prosecutor. This motion is time sensitive and needs to be heard prior to 12/14. Judge Collins is available to hear this motion via Zoom on either 12/9 or 12/10. Mr. Hone's virtual appearance would also be required at the motion. Please advise asap your availability so I can have the matter scheduled.



Maria DeRose
Team Leader for the Hon. Michael T. Collins
Team Leader for the Hon. Linda G. Baxter
Room 221-120 Hooper Ave
Toms River, NJ 08753
732-504-0700 ext 64279
maria.derose@njcourts.gov

John P. Reilly

Attorney at Law

One Hadley Avenue, P.O. Box 4748

Toms River, NJ 08754

Telephone: (732) 244-5100 • Facsimile: (732) 244-0420

e-mail: john@johnreillylaw.com

October 16, 2020

Hon. Linda G. Baxter, J.S.C.
Superior Court of New Jersey
Ocean County Superior Court
P.O. Box 2191
Toms River, New Jersey 08754

Via E-Courts & E-mailed to Maria.DeRose@njcourts.gov

Re: State v. Richard Hone
Brick Twp. Complaint/Warrant No. 1506-W-2020-116
O.C. Case No. 20000532
Motions Hearing: Wednesday, 10/21/2020, 3:00 p.m.

Dear Judge Baxter:

Please recall that I represent the defendant, Mr. Richard Hone (defendant), for the above unindicted matter. Kindly accept the within letter memorandum in lieu of a more formal brief in further support of defendant's pending motions for **(1)** Change of Venue and **(2)** Disqualification of the O.C Prosecutor's Office, currently scheduled for hearing before Your Honor on Tuesday, 12/8/2020, 3:30 p.m.

To begin with, I ask that Your Honor first fully review defendant's submissions of 8/7/2020, 8/12/2020 and 8/25/2020 and the facts/procedures and related arguments set forth therein, such that will not be herein repeated. Rather, this letter memorandum will focus upon events as have since transpired as set forth in the Attorney's Certification submitted herewith, which most respectfully, all the more require that relief sought, as follows:

ARGUMENT

I. Removal/Disqualification of the Ocean County Prosecutor's Office from further prosecution of the within matter.

In addition to that as previously pointed to, I ask that this Court now take note of the remarkably baseless threat as has now been leveled against the defendant's very freedom, one as initiated and doggedly pursued by his prosecutor, and as may be summed up "the defendant must now be put in jail, otherwise he will flee his prosecution." (See, Exhibits HH, II, JJ, KK & LL).

In this regard, it must be kept in mind that defendant has remained released from detention upon the subject charges since February, 2020, during which time he has fully complied with all requirements/requests of pre-trial services with whom he has developed a cordial and cooperative relationship. It must also be kept in mind that there had never been placed upon defendant any restriction as to his travel, whether to Mexico or otherwise, as a condition to his pre-trial release. It must also be noted that although it was my mistaken impression regarding defendant's anticipated business trip to Mexico that apparently prompted the State to pursue his incarceration in the first place (taking note that pre-trial services sought no such action), same has since been entirely cleared up as confirming such trip to be to Arizona. And that, although being under no obligation to do so, but in effort to find peace and live his life while he awaits trial upon these remarkably flimsy charges of which he is presumed innocent, although

confirming his flight schedule as-booked, as requested by the prosecutor; confirming that he has no passport to surrender as requested by the prosecutor, and; agreeing that he will not seek a passport unless consented to by whatever prosecutor may then be then prosecuting this matter; the remarkably presumptuous, as would to any objective observer be deemed spiteful, best response given by his Prosecutor was and remains "I am not inclined to withdraw my motion to revoke just yet" (**Exhibit LL**).

Once again, it must be acknowledged that this matter has, from its inception, been one as marked with a contentiousness that is truly palpable. That tempers may rise is not only understandable, but nearly assured. But, no matter how this matter has proceeded and evolved, and no matter how justified a given prosecutor or his/her office may feel in their attitude and their actions, they must still perform the difficult task of maintaining that appearance of disinterested, impartial justice.

"The appointment of an interested prosecutor raises such doubts. Prosecution by someone with conflicting loyalties "calls into question the objectivity of those charged with bringing a defendant to judgment." *Vasquez, supra*, at 474 U. S. 263. **It is a fundamental premise of our society that the state wield its formidable criminal enforcement powers in a rigorously disinterested fashion, for liberty itself may be at stake in such matters** (*emphasis added*). " *Young v. U.S. ex rel. Vuitton et Fils*, 481 U.S. 787, 810-811 (1987).

Whatever may be in this given Prosecutor's heart or that of her Office; whatever claim has been/may be hereafter raised that this is just another case, one that has been and will be treated with the

same level of disinterest as any other; and whether this Prosecutor now or at some later date finds herself to be so "inclined" to withdraw her motion and thus grant the defendant his liberty, this most recent escapade must be accepted as having stripped away any remaining veneer of impartiality.

And add to this, the criminal charges as have been presented by the defendant (**Attorney's Cert, para.2, Exhibit GG**) as now pending review for determination of probable cause by whomever is ultimately deemed appropriate. Ones which, along with the tortured history of this prosecution as described to date, must only all the more lead any objective observer to at least suspect if not conclude that this Prosecutor and her office must be and remain anything but impartial.

II. Change of Venue.

The Monmouth County Assignment Judge has determined that defendant's Law Division matters must now proceed in Ocean County because named defendants to same include Judges in the Monmouth Vicinage (**Exhibits Z & EE**). Consequently, all Law Division matters as initiated by the defendant, including those as have included as defendants to same Judges in the Ocean Vicinage, are now venued in Ocean County. Putting aside for the moment the inherent contradiction in such development, that Ocean County must be properly seen as the last venue in which defendant may be perceived to be given justice has only been further confirmed by the facts that: **(1)** Judge Lynch Ford has herself since acknowledged that her

Order of 8/21/2020 must be perceived as creating in her such apparent conflict as required her recusal (**Exhibit FF**); (2) the actual dismissal of defendant's subject filed Law Division actions as has followed said Order (**Attorney's Cert, para.3**), and; (3) like the Prosecutor, Judge Lynch Ford is now the subject of criminal charges as have been presented by the defendant as are now pending review for determination of probable cause by whomever is ultimately deemed appropriate, ones which must only all the more lead any objective observer to conclude that Judge Lynch Ford's Vicinage cannot offer to this defendant the level of apparent impartiality demanded of our judicial process (**Attorney's Cert, para.2, Exhibit GG**) .

Judge Lynch Ford had once rightly transferred venue of this criminal matter from Ocean County to Burlington County. For reasons that remain a mystery, same was thereafter inexplicably returned to Ocean County for prosecution. Since its return, the reasons why same should never have been venued in Ocean County have only been exacerbated both by such actions as initiated by the defendant (e.g. **Exhibit GG**) and the actions/acknowledgments of Judge Lynch Ford herself (e.g. **Exhibits BB & FF**). Civil actions are important. Money or such other relief as may be sought therein is important. But there has been and remains only one action where the defendant's most precious possession, his freedom, is at stake. One for which our system of justice's most precious attribute, the appearance of

absolute and abiding impartiality will be irreparably sullied should venue thereof remain in Ocean County.

Conclusion

For the reasons set forth above, it is respectfully submitted that Your Honor must grant defendant's motions and enter the forms of Order(s) submitted for **(1)** change of venue and for **(2)** removal/disqualification of the Ocean County Prosecutor's Office from further prosecution of the Criminal Complaint.

Thank you for your kind attention.

Respectfully submitted,

S/John P. Reilly

John P. Reilly

JPR/afr
Enclosures

cc (w/encls., via e-courts & e-mail): Ms. Taylor Toscano, A.P.

JOHN P. REILLY, ESQ.
One Hadley Avenue, P.O. Box 4748
Attorney I.D. No. 015041980
Toms River, NJ 08754
(732) 244-5100, john@johnreillylaw.com
Attorney for Defendant, Richard Hone

THE STATE OF NEW JERSEY, Plaintiff, vs. RICHARD HONE, Defendant.	SUPERIOR COURT OF NEW JERSEY OCEAN COUNTY LAW DIVISION / CRIMINAL PART CASE NO. 20000532 COMPLAINT-WARRANT NO. 1506-W-2020-116 Criminal Action DEFENDANT'S ATTORNEY'S THIRD SUPPLEMENTAL CERTIFICATION IN SUPPORT OF DEFENDANT'S REMAINING MOTIONS FOR ORDER (1) TRANSFERRING VENUE OF THE PROSECUTION OF THE CRIMINAL COMPLAINT OUT OF OCEAN COUNTY TO A VENUE DEEMED MOST APPROPRIATE IN KEEPING WITH THE RULES OF COURT, AND (2) REMOVING/ DISQUALIFYING THE OCEAN COUNTY PROSECUTOR'S OFFICE FROM FURTHER PROSECUTION OF THE CRIMINAL COMPLAINT.
--	--

I, JOHN P. REILLY, ESQ., do hereby certify to the following:

1. I am an Attorney at Law of the State of New Jersey representing the defendant, RICHARD HONE (hereafter the defendant), for the above captioned matter and as such am fully familiar with the substance of this Certification.

2. In effort to provide a complete record in this matter, please see the attached additional lettered Exhibits as relate to this matter:

- EE. 8/28/2020 Order of Monmouth County Assignment Judge Lisa P. Thornton transferring venue of the captioned matters from Monmouth County to Ocean County for reason that named defendants to same include Judges in the Monmouth Vicinage. In this regard, it is to be noted that with same, all seven law division matters as initiated by the defendant are now pending in Ocean County (see also, previously submitted **Exhibit Z** where same reason for transfer is expressed).
- FF. 10/5/2020 Order of the Honorable Marlene Lynch Ford, A.J.S.C., as entered upon decision of 8/28/2020, granting defendant's motion for her recusal.

- GG. Defendant's paperwork as to his civilian criminal complaints as filed by defendant with the Seaside Heights Municipal Court on 11/16/2020 and as brought against: **(1)** Marlene Lynch Ford **(2)** Ocean County Prosecutors Office, Taylor Toscano, Brad Billhimer, and **(3)** Kathryn Morris, DAG. In this regard, in telephone conversation of 12/7/2020 with Ms. Patti Germander, Seaside Heights Municipal Court Administrator, I was advised: **(1)** That the Seaside Heights Municipal Court does not make determinations of probable cause upon proposed civilian complaints, and normally refer same to the Ocean County Prosecutor's Office upon receipt, and **(2)** in light of the named defendants, it is as of now unknown to whom same will be referred, and **(3)** she is currently awaiting direction from her Division Manager, Mr. Joseph Scalma, on how she is to proceed upon same.
- HH. Taylor E. Toscano correspondence date 11/18/2020 and referred to Notice of Motion to Revoke Pretrial Release ("the State's Motion to Revoke", please see the 26 pages of Exhibits referred to therein as filed on E-Courts).
- II. Defendant's 11/18/2020 response to the State's Motion to Revoke.
- JJ. Defendant's 11/19/2020 1st supplemental response to the State's Motion to Revoke.
- KK. Defendant's 11/19/2020 2nd supplemental response to the State's Motion to Revoke.
- LL. 11/20/2020 Ms. Taylor Toscano, A.P. e-mail wherein she advises: "I am not inclined to withdraw my motion to revoke just yet."

3. With reference to previously submitted **Exhibit BB**, the Defendant advises to the best of in knowledge and belief that subsequent to same the Hon. Marlene Lynch Ford's has dismissed 4 complaints, although I cannot say for certain why, and that 5 complaints remain pending for which he is involved in an ongoing dispute as to the Court's ordering the waiver of fees for service.

I 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.

Respectfully submitted,
S/John P. Reilly

Dated: December 7, 2020

JOHN P. REILLY, ESQ.
Attorney for defendant,
Richard Hone

ORDER PREPARED BY THE COURT

SUPERIOR COURT OF NEW JERSEY
MONMOUTH VICINAGE

ORDER TO CHANGE VENUE

Richard Hone

Plaintiff

vs.

DOCKET NO.: MON-L-2719-20

Katie Gummer, et al.

Defendant(s)

Richard Hone

Plaintiff

vs.

DOCKET NO.: MON-L-2720-20



Defendant

Richard Hone

Plaintiff

vs.

DOCKET NO.: MON-L-2721-20

Rachel Walton, et al.

Defendant(s)

Richard Hone

Plaintiff

vs.

DOCKET NO.: MON-L-2573-20

Matthew Toscano

Defendant

These matters come before the court, sua sponte; and the court having found that venue was improperly laid in the Law Division under docket numbers MON-L-2719-20, MON-L-2720-20, MON-L-2721-20, and MON-L-2573-20 because named defendants in these matters include

-EE-

Judge(s) in the Monmouth Vicinage;

IT IS on this 28th day of August 2020,

ORDERED that the venue in the above-captioned matters (MON-L-2719-20, MON-L-2720-20, MON-L-2721-20, and MON-L-2573-20) is hereby transferred to Ocean County for disposition by a judge to be designated by the Honorable Marlene Lynch Ford, A.J.S.C.; and it is further

ORDERED that a copy of this Order be served on all parties of interest via eCourts or regular mail within seven (7) days of the date herein.

/s/ Lisa P. Thornton
LISA P. THORNTON, A.J.S.C.

ORDER PREPARED BY THE COURT

FILED

OCT - 5 2020

STATE OF NEW JERSEY,

v.

RICHARD HONE,

Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL PART
OCEAN COUNTY
CHAMBERS OF JUDGE FORD
SUPERIOR COURT
OCEAN COUNTY

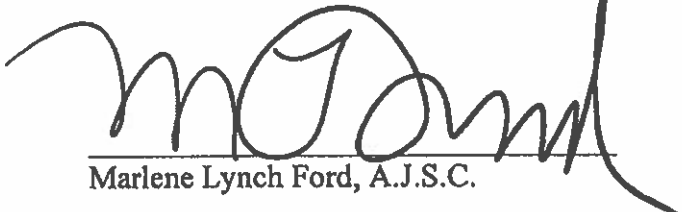
CASE NO.: 20-000532-001

ORDER

This matter came before the court on the defendant's motion to recuse the undersigned Judge of the Superior Court; the motion to change venue, and for other relief; and the court having conducted oral argument on this matter on August 28, 2020; John P. Reilly Esq. appearing on behalf of the defendant; and Taylor Toscano appearing on behalf of the state of New Jersey; and the court having considered the argument of counsel on the issue of judicial recusal; and it further appearing that the court on August 21, 2020 entered an Order finding that the defendant was a vexatious litigant and the defendant was restrained from filing any civil actions in the Superior Court of New Jersey without such complaints being first reviewed and authorized by the Assignment Judge in the vicinage; and for good cause shown,

It is on this 5th day of October, 2020, Ordered:

1. That with regard to the issue of judicial recusal on this criminal matter only, the court will grant that request and will assign another criminal division Judge to handle any remaining applications by the defendant;
2. That the purpose of this Order is to memorialize the decision of the court entered on the record on August 28, 2020, and this Order is effective to that date;
3. A copy of this Order shall be provided to the defendant through counsel, John Reilly, and a copy shall be provided to the Office of the Ocean County Prosecutor.


Marlene Lynch Ford, A.J.S.C.

-FF-



COMPLAINT INFORMATION FORM

Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.

Defendant's Name: Martene Lynch-Bred

Defendant's Address: 40 120 Hooper Ave, Texas River, TX 78754

Defendant's Phone # (if known): N/A

Defendant's Date of Birth (if known): N/A

Defendant's Driver's License # (if known): N/A State TX

If this is a motor vehicle complaint, list license plate # of other vehicle: _____ State _____

Description of vehicle (if known): N/A

Names and addresses of witnesses (use additional paper if necessary): _____

Your Name (you are the complainant): Richard Hone

Your Address: Br. Mailing - 40 Stuart Santiago

Your Telephone #: _____ e-mail: _____

307
Grove ST.
R.A.H. 11/1
07065

FOR COURT USE ONLY

Court Administrator/Deputy Initials: _____ Date: _____

Corresponding complaint #'s: _____

(Every request requires the filing of a complaint.)

November 2010

- GG -



CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

State of New Jersey
County:

Date of Incident: June 2020 to Current

Location of Incident: Central Ave Municipality: Seaside Hts

I offer the following facts and information to establish probable cause in this

Complaint against MARLENE Lynch - Is re
(Defendant's Name)

Whom I would like to charge with NJS 2C:30-2
(List Statute(s) or Ordinance(s))

How do you know the identity of the person you are charging? She has violated my
CIVIL RIGHTS OVER

Describe Incident in detail - **USE ONLY THE LINES BELOW**

20X

ATTACHED
CERTIFICATION
(fully executed)

Certification: I 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.

Signature of Complaining Witness

Date

-GG-

Richard Hone, Ph.D. [REDACTED]
C/O Stuart Santiago, Esq.
307 Grove St. Rahway NJ 07065
[REDACTED]

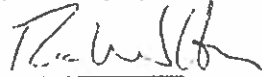
CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

RICHARD HONE, duly of age, does certify and say:

I am certifying that Marlene Lynch-Ford, a Judge in Ocean County, has committed the crimes of Official Misconduct under NJ 2C 30:2. These crimes have been ongoing since 2015 (the original charge of holding a Trial without me waiving me Right to be tried in absentia, which must be done in Family Court, and without counsel, which is so unbelievable it is impossible to most people that it could even happen, but it did, and she knew what she was doing was completely illegal and criminal, is not included here and will be filed shortly).

1. Continues to enforce an order from February 9, 2016 that she is completely aware has NEVER BEEN SERVED PROPERLY under NJ Court Rule 1.5, the crime of Official Misconduct pursuant to NJ 2C 30:2.
2. Official Misconduct for maliciously, knowingly, purposefully never issuing FEE WAIVERS on any of my Civil Rights lawsuits of which she is a defendant in 4 or 5.

I swear the above statements made by me are true to the best of my belief and knowledge. If any of the foregoing statements made by me are willfully false, I am subject to punishment.



Richard Hone

11-14-20
Date:



COMPLAINT INFORMATION FORM

Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.

Defendant's Name: OCEAN PROSECUTOR OFFICE, TAYLOR TOWNSHIP, BURLINGTON
Defendant's Address: 119 Hooper Ave
Defendant's Phone # (if known): N/A
Defendant's Date of Birth (if known): N/A
Defendant's Driver's License # (if known): N/A State MA

ET AL;
John +
Jane Doe
1-700

If this is a motor vehicle complaint, list license plate # of other vehicle: _____ State _____

Description of vehicle (if known): N/A

Names and addresses of witnesses (use additional paper if necessary): _____

Your Name (you are the complainant): RICHARD JONE

Your Address: 607 Main St, 10 Stuart St, 1030, 1-50

Your Telephone #: _____ E-mail: _____

307 boxes
KAWAY
127065

FOR COURT USE ONLY

Court Administrator/Deputy Initials: _____ Date: _____

Corresponding complaint #'s: _____

(Every request requires the filing of a complaint.)



CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

State of New Jersey
County: Duane

Date of Incident: July 2020 - Current

Location of Incident: Central Ave Municipality: Seaside Hts.

I offer the following facts and information to establish probable cause in this

Complaint against OC Prosecutors OFF, TAP/TISCANO, Frank Billman
(Defendant's Name)

Whom I would like to charge with NJ 2C:30-2 ET AL
(List Statute(s) or Ordinance(s)) John/Jane Doe 1-100

How do you know the identity of the person you are charging? Corrupt prosecutors
I have a case with

Describe Incident in detail - USE ONLY THE LINES BELOW

CERTIFICATION

ATTACHED

(Billy Specter)

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

Signature of Complaining Witness

Date

11-14-20

Richard Hone, Ph.D. [REDACTED]
C/O Stuart Santiago, Esq.
307 Grove St. Rahway NJ 07065
[REDACTED]

CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

RICHARD HONE, duly of age, does certify and say:

1. Charging me with a crime they have full knowledge the victim was not in Ocean county at the time, and after seeing Proof, refusing to dismiss it.
2. Enforcing an order from 2016 they have full knowledge has never been properly, namely the "no-contact" Order of 2-16-16, which she is in possession of a copy of, and relied on it in a hearing in Burlington County, and knows the clause regarding "email, and to give my address in 2 weeks (which they already had, and were told to send to my LKA) is NOT service under NJ R. 1.5, and the contempt of that Order was dismissed anyway, which she also has full knowledge of.
3. Have FULL KNOWLEDGE I was tried in absentia and without counsel in 2015 and does nothing, even though she was sent a letter asking an investigator from the Prosecutors office to contact me on October 2, 2020 which was a cover letter to the 3rd Amended Federal Civil Rights lawsuit she is a defendant in with billhimer, lynch-ford, etc.

I swear the above statements made by me are true to the best of my belief and knowledge. If any of the foregoing statements made by me are willfully false, I am subject to punishment.


Richard Hone
Date: 11-14-20



COMPLAINT INFORMATION FORM

Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.

Defendant's Name: KATHRYN MORRIS, D.A. 6
Defendant's Address: 25 W Market ST, Tremonton, UT 84603

Defendant's Phone # (if known): N/A

Defendant's Date of Birth (if known): 4/19

Defendant's Driver's License # (if known): N/A State UT

If this is a motor vehicle complaint, list license plate # of other vehicle: _____ State _____

Description of vehicle (if known): N/A

Names and addresses of witnesses (use additional paper if necessary): _____

Your Name (you are the complainant): Richard Horne

Your Address: 600 Main St, 40 Stuart, San Diego, CA 92101

Your Telephone #: [REDACTED] E-mail: [REDACTED]

307
6100 ST
Tremonton
UT 84603

FOR COURT USE ONLY

Court Administrator/Deputy Initials: _____ Date: _____

Corresponding complaint #'s: _____

(Every request requires the filing of a complaint.)



CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

State of New Jersey
County:

Date of Incident: OCT - Current 2020

Location of Incident: Centra Ave Municipality Sp. Side H/S

I offer the following facts and information to establish probable cause in this

Complaint against KATHRYN MORRIS DA 6
(Defendant's Name)

Whom I would like to charge with NJ 2C:30-2
(List Statute(s) or Ordinance(s))

How do you know the identity of the person you are charging? Said by DA 6 for the defendant in my Civil rights

Describe Incident in detail - **USE ONLY THE LINES BELOW**

CERTIFICATION

EXHIBIT 1-2
ATTACHED

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

Signature of Complaining Witness

Date

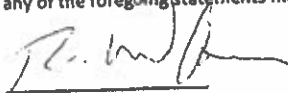
Richard Hone, Ph [REDACTED]
C/O Stuart Santiago, Esq.
307 Grove St. Rahway NJ 07065
[REDACTED]

CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

RICHARD HONE, duly of age, does certify and say:

1. Forged my signature on a Certified Mail form, emailed it to me in Seaside Heights, submitted it to the court in Burlington in front of Judge Arrington, got caught, had the opportunity to rectify it, refused, and now needs to be charged with NJ 2C 30-2 Official Misconduct.

I swear the above statements made by me are true to the best of my belief and knowledge. If any of the foregoing statements made by me are willfully false, I am subject to punishment.



Richard Hone

11-16-20
Date:

EXHIBIT 1-2
ATTACHED

— Complete items 1, 2, and 3.

- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

CERTIFIED MAIL - RETURN RECEIPT, NO. 1

7015 0640 0001 2567 0884

Richard Hone
24 Johnston Ave
West Brick, NJ 08724



9590 9402 4976 9063 5347 43

2. Article Number (Transfer from service label)

7015 0640 0001 2567 0884

☒ Agent ☐ Addressee	
B. Received by (Printed Name) X HONE	C. Date of Delivery
D. Is delivery address different from item 1? If YES, enter delivery address below	
☐ Yes ☐ No	
3. Service Type ☐ Adult Signature ☐ Adult Signature Restricted Delivery ☐ Certified Mail ☐ Certified Mail Restricted Delivery ☐ Collect on Delivery ☐ Collect on Delivery Restricted Delivery ☐ Insured Mail ☐ Insured Mail Restricted Delivery (over \$500)	
☐ Priority Mail Express® ☐ Registered Mail™ ☐ Registered Mail Restricted Delivery ☐ Return Receipt for Merchandise ☐ Signature Confirmation™ ☐ Signature Confirmation Restricted Delivery	

6-OS 0884
JUL 17 2015
WEST BRICK, NJ 08724

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

Khajezadeh, Dina

From: John@johnreillylaw.com
Sent: Monday, December 7, 2020 3:10 PM
To: Maria Derosé; Toscano, Taylor
Cc: Brianna Sandroni; Christopher Diller; Alicia Cook; Jennifer Cosentino
Subject: RE: [External]RE: hone motion to revoke release
Attachments: Hone adv. State, Case No. 20000532, Defendant's Attorney's 12-7-2020 Judges Baxter and Collins Letter.pdf; Hone adv. State, Case No. 20000532, Defendant's Exhibit A.pdf; Hone adv. State, Case No. 20000532, Defendant's Exhibit B.pdf; Hone adv. State, Case No. 20000532, Defendant's Attorney's 12-7-2020 Supplemental Cert..pdf; Hone adv. State, Case No. 20000532, Defendant's Exhibit GG.pdf

Dear All,

Please see may attached letter to Judges Baxter and Collins, Exhibits A & B to same, and my form of Certification and Exhibit GG thereto referred to therein, all as e-filed this date.

Thank you,

John Reilly

Dear All,

Here are said Exhibits HH through LL.

Thank you,

John Reilly

Dear All,

As to the pending motions, please note that I anticipate the filing of a written request that same be adjourned later this afternoon.

In the meantime, as at least for now same remain scheduled for tomorrow, please see upon defendant's motions for change of venue and disqualification of the O.C. Prosecutor from further prosecution, the attached forms of supplemental letter memorandum, attorney's cert. and exhibits EE through GG (additional exhibits to follow due to volume) e-filed this date.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: [External]RE: hone motion to revoke release

From: Maria Derosé <Maria.Derosé@njcourts.gov>

Date: Thu, December 03, 2020 9:52 am

To: "John@johnreillylaw.com" <John@johnreillylaw.com> ,

"TToscano@co.ocean.nj.us" <TToscano@co.ocean.nj.us>

Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov> , Christopher Diller <christopher.diller@njcourts.gov> , Alicia Cook

<alicia.cook@njcourts.gov>, Jennifer Cosentino
<jennifer.cosentino@njcourts.gov>

Hi Everyone,

Judge Baxter will hear the Change of Venue & Disqualification of OC Pros Office motions on 12/8, at 3:30pm via Zoom. Pending the outcome of those motions before Judge Baxter, the motion to revoke release will tentatively be scheduled before Judge Collins for 12/9, at 1:30pm via Zoom. If the motions are granted by Judge Baxter, the motion to revoke release will subsequently be scheduled for a date and time to be determined by the transfer county.

All parties are expected to attend the motions. As they are being heard via Zoom any unavailability for the motions will need to be put in writing for Judges review.

Maria

From: John@johnreillylaw.com <John@johnreillylaw.com>
Sent: Wednesday, December 2, 2020 3:10 PM
To: TToscano@co.ocean.nj.us; Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>; Christopher Diller <christopher.diller@njcourts.gov>
Subject: [External]RE: hone motion to revoke release

CAUTION: This email originated from outside the Judiciary organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
Dear All,

As to Ms. Toscano's below, I see no evidence that defendant "makes himself unavailable" as a delay tactic or otherwise and simply cannot bring myself to again go down that same rabbit hole seeking demanded proofs as marked my effort upon the State's motion to revoke, one as only resulted in the State's continued dogged refusal to withdraw same.

For everyone's information, I will be out of the office on a personal matter tomorrow and likely Friday, during which I will likely not be reviewing/responding to any additional emails on this matter. However, I will with certainty be returning Monday, hopefully to find that the subject motions have been adjourned as I have requested, or if not, to rejoin the effort.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: hone motion to revoke release
From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>
Date: Wed, December 02, 2020 2:18 pm
To: "John@johnreillylaw.com" <John@johnreillylaw.com>, Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>, Christopher Diller <christopher.diller@njcourts.gov>

Mr. Reilly,

Please provide some sort of proof showing that the defendant is not available. It is my understanding he is unemployed, so this seems like a delay tactic. At some point these motions need to be heard and Mr. Hone makes himself unavailable without sufficient proof often.

Thank you,
Taylor



Taylor Toscano
Assistant Prosecutor
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2741
Email: ttoscano@co.ocean.nj.us

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FOR OFFICIAL USE ONLY - LAW ENFORCEMENT SENSITIVE

From: John@johnreillylaw.com <John@johnreillylaw.com>
Sent: Wednesday, December 2, 2020 1:58 PM
To: Toscano, Taylor <TToscano@co.ocean.nj.us>; Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>; Christopher Diller <christopher.diller@njcourts.gov>
Subject: RE: hone motion to revoke release

Dear All,

I too would have no problem with Judge Collins being assigned this matter for all proceedings going forward, but before the back and forth on this goes any further, please note that I am advised that the defendant is not available on either the 9th or the 10th and that he does not waive his appearance for any hearings or conferences on this matter.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: hone motion to revoke release
From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>
Date: Wed, December 02, 2020 1:34 pm
To: "John@johnreillylaw.com" <John@johnreillylaw.com>, Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>, Christopher Diller <christopher.diller@njcourts.gov>

I'd be happy to argue all pending issues before Judge Collins if the Court deems appropriate.

Thank you,
Taylor



Taylor Toscano
Assistant Prosecutor
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2741
Email: ttoscano@co.ocean.nj.us

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FOR OFFICIAL USE ONLY - LAW ENFORCEMENT SENSITIVE

From: John@johnreillylaw.com <John@johnreillylaw.com>
Sent: Wednesday, December 2, 2020 1:30 PM
To: Toscano, Taylor <TToscano@co.ocean.nj.us>; Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>; Christopher Diller <christopher.diller@njcourts.gov>
Subject: RE: hone motion to revoke release

Dear Maria,

For the reasons set forth in the pleadings filed upon same, the State's motion to revoke defendant's release (State's motion to revoke), one as has proven to be entirely without merit, should properly be either voluntarily withdrawn by the State or dismissed by the Court *sua sponte*.

Failing same, for the reasons previously stated, the State's motion to revoke must not proceed to hearing until defendant's motions for Change of Venue out of Ocean County and Disqualification of the Ocean County Prosecutor's Office from further prosecution of this matter (defendant's motions), those as founded in such previously displayed/apparent bias as described in the pleading papers filed to date, have been decided.

The record upon defendant's motions must be supplemented with reference to subsequent/ongoing events, including the State's now apparent refusal to withdraw its now as-proven baseless motion to revoke defendant's release.

Defendant has itemized in detail his packed agenda for his business trip to Arizona beginning on 12/14/2020 such as would render any requirement that hearing upon defendant's motions proceed during same as being, if not implausible, at the very least unfair.

Therefore, I once again ask that all motions be adjourned to dates in January, with defendant's motions, as supplemented, to proceed to hearing first, and only if same are denied (and assuming the State's motion to revoke be not by then withdrawn or dismissed) to only then to be followed by hearing upon the State's motion to revoke.

Please advise upon the above via reply e-mail.

Thank you,

John Reilly

----- Original Meino of htis matterssage -----

Subject: RE: hone motion to revoke release

From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>

Date: Wed, December 02, 2020 11:35 am

To: Maria Derosé <Maria.Derosé@njcourts.gov>, "John reilly

(John@johnreillylaw.com)" <John@johnreillylaw.com>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>, Christopher Diller
<christopher.diller@njcourts.gov>

Hi Maria,

I am available either day. Thank you!

Taylor



Taylor Toscano
Assistant Prosecutor
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2741
Email: ttoscano@co.ocean.nj.us

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FOR OFFICIAL USE ONLY - LAW ENFORCEMENT SENSITIVE

From: Maria Derosé <Maria.Derosé@njcourts.gov>
Sent: Wednesday, December 2, 2020 11:33 AM
To: Toscano, Taylor <TToscano@co.ocean.nj.us>; john reilly (John@johnreillylaw.com) <John@johnreillylaw.com>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>; Christopher Diller <christopher.diller@njcourts.gov>
Subject: hone motion to revoke release

Hi Taylor & John,

Judge Collins has been assigned to the handle the motion to revoke release filed by the prosecutor. This motion is time sensitive and needs to be heard prior to 12/14. Judge Collins is available to hear this motion via Zoom on either 12/9 or 12/10. Mr. Hone's virtual appearance would also be required at the motion. Please advise asap your availability so I can have the matter scheduled.

Maria DeRose
Team Leader for the Hon. Michael T. Collins
Team Leader for the Hon. Linda G. Baxter
Room 221-120 Hooper Ave
Toms River, NJ 08753
732-504-0700 ext 64279
maria.derosé@njcourts.gov

John P. Reilly

Attorney at Law

One Hadley Avenue, P.O. Box 4748

Toms River, NJ 08754

Telephone: (732) 244-5100 • Facsimile: (732) 244-0420

e-mail: john@johnreillylaw.com

December 7, 2020

Hon. Linda G. Baxter, J.S.C.
Superior Court of New Jersey
Ocean County Superior Court
P.O. Box 2191
Toms River, New Jersey 08754

Hon. Michael T. Collins, J.S.C.
Superior Court of New Jersey
Ocean County Superior Court
P.O. Box 2191
Toms River, New Jersey 08754

Via E-Courts & E-mailed to Maria.DeRose@njcourts.gov

Re: State v. Richard Hone
Brick Twp. Complaint/Warrant No. 1506-W-2020-116
O.C. Case No. 20000532

- Hearing upon Defendant's Motions for Change of Venue and Disqualification of Prosecutor, currently scheduled for Tuesday, 12/8/2020, 3:30 p.m.
- Hearing upon State's Motion to Revoke Release, currently scheduled for Wednesday, 12/9/2020, 1:30 p.m.

Dear Judges Baxter and Collins:

Please recall that I represent the defendant, Mr. Richard Hone (defendant) for the above matter. With reference to Ms. Derosé's enclosed copied correspondence of 12/3/2020 (**Exhibit A**), also enclosed herewith please find:

1. Defendant's correspondence of this date and referred to 12/4/2020 report of Drs. Maxey and Moore-Hodge, which are self-explanatory (**Exhibit B**).
2. My Certification of this date as submitted in further support of defendant's motions for change of venue and disqualification of prosecutor, and referred to **Exhibit GG** to same, e-filed this date.

Most respectfully, it is now confirmed that the defendant's doctors have directed that he not continue to participate in the ongoing struggle as has marked this matter for a period of at least 3 months. But as importantly, it is now revealed that Judge Marlene Lynch Ford and the Ocean County Prosecutor's Office and its members are the subject of civilian criminal complaints as presented by the defendant, whose status/progress remains to be determined and thus same as remain pending.

Accordingly, it is respectfully requested that hearings upon the above motions be adjourned at least to a date as may allow both of the above issues to resolve.

Thank you for your kind attention.

Respectfully submitted,

S/John P. Reilly

John P. Reilly

JPR/afr
Enclosures

cc (w/encls., via e-courts & e-mail): Ms. Taylor Toscano, A.P.

Subject: RE: [External]RE: hone motion to revoke release
From: Maria Derosé <Maria.Derosé@njcourts.gov>
Date: Thu, Dec 03, 2020 9:52 am
To: "John@johnreillylaw.com" <John@johnreillylaw.com>, "TToscano@co.ocean.nj.us" <TToscano@co.ocean.nj.us>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>, Christopher Diller <christopher.diller@njcourts.gov>, Alicia Cook <alicia.cook@njcourts.gov>, Jennifer Cosentino <jennifer.cosentino@njcourts.gov>
Attach: image001.jpg
image002.jpg

Hi Everyone,

Judge Baxter will hear the Change of Venue & Disqualification of OC Pros Office motions on 12/8, at 3:30pm via Zoom. Pending the outcome of those motions before Judge Baxter, the motion to revoke release will tentatively be scheduled before Judge Collins for 12/9, at 1:30pm via Zoom. If the motions are granted by Judge Baxter, the motion to revoke release will subsequently be scheduled for a date and time to be determined by the transfer county.

All parties are expected to attend the motions. As they are being heard via Zoom any unavailability for the motions will need to be put in writing for Judges review.

Maria

From: John@johnreillylaw.com <John@johnreillylaw.com>
Sent: Wednesday, December 2, 2020 3:10 PM
To: TToscano@co.ocean.nj.us; Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>; Christopher Diller <christopher.diller@njcourts.gov>
Subject: [External]RE: hone motion to revoke release

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Dear All,

As to Ms. Toscano's below, I see no evidence that defendant "makes himself unavailable" as a delay tactic or otherwise and simply cannot bring myself to again go down that same rabbit hole seeking demanded proofs as marked my effort upon the State's motion to revoke, one as only resulted in the State's continued dogged refusal to withdraw same.

For everyone's information, I will be out of the office on a personal matter tomorrow and likely Friday, during which I will likely not be reviewing/responding to any additional emails on this matter. However, I will with certainty be returning Monday, hopefully to find that the subject motions have been adjourned as I have requested, or if not, to rejoin the effort.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: hone motion to revoke release
From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>
Date: Wed, December 02, 2020 2:18 pm
To: "John@johnreillylaw.com" <John@johnreillylaw.com>, Maria Derosé <Maria.Derosé@njcourts.gov>
Cc: Brianna Sandroni <brianna.sandroni@njcourts.gov>, Christopher Diller <christopher.diller@njcourts.gov>

Mr. Reilly,

Please provide some sort of proof showing that the defendant is not available. It is my understanding he is unemployed, so this seems like a delay tactic. At some point these motions need to be heard and Mr. Hone makes himself unavailable without sufficient proof often.

Thank you,
Taylor

- A -

**THE LORD HAS BLESSED OUR FAMILY WITH AN ABUNDANCE OF LOVE
AND STRENGTH THAT NOTHING CAN EVER BREAK**

Richard Hone
c/o Stuart Santiago, Esq.
307 Grove St.
Rahway, NJ 07065


To: John Reilly, Esq.
Re: Letter to court, NOT AVAILABLE for 12-8, 12-9 motions
Date: 12-7-20

Pursuant to the request from the court to put in writing and give an explanation why I cannot attend these "hearings" (I use that term because these very hearings held on these dates are part of the corruption in OCN County by the Judges and Prosecutors, etc.) please rely on the below narrative and the letter of Dr. Angela Moore.

I am NOT available, nor will I be for a minimum of 3 months, by Doctors Orders of Dr. Angela Moore, because they severely effect my mental health, and since I have already been deemed and accepted by the Family Court to be 100% disabled, these "hearings" further exacerbate an already horrible situation, and render it impossible to assist in my defense, which because of the criminal acts of Official Misconduct (NJ 2C 30:2) I charged Taylor Toscano, Billhimer, the prosecutors office, "Judge" Lynch-Ford, and DAG Kathryn Morris with what are now Pending Criminal Charges I have been Ordered not to participate.

I also do NOT waive my Right to attend, even though OCN has tried me in Family court before in 2015 WITHOUT COUNSEL APPOINTED OR PRESENT and WITHOUT WAIVING MY RIGHT to do so, and they continue to enforce and "order" that I have never been served with, look and act disinterestedly at the above felony's by Lynch-Ford (and Michael Paulhus) even though I asked Toscano and Billhimer for an investigation into those Crimes when I served them both with the Federal Civil Rights lawsuit they are all defendants in.

I will have NO phone or internet access, Family Members are with me taking care of me, and are watching over me carefully and with compassion and love.

Thanks again for everything, and see you in 3 months or so,

Richard Hone E-Signature
Richard Hone

12-7-20
Date:

-B-

Healing Hands Medical Group

2975 Wishire Blvd. #450

Los Angeles, CA 90010

Ph. 213-368-1654

Fax: 213-268-1658

Email: HHMG12@Yahoo.com

To John Reilly, Esquire

December 4, 2020

Re: Hone, Richard

DOB 4/7/59

Dear Sir,

This letter is to certify that we have been treating Mr. Hone via Tele Health for [REDACTED] in relation to his separation from his young daughter. He is unable to participate in any civil or criminal matters at this time. We hope and anticipate that once the family matter is resolved and he is reunited with his daughter, [REDACTED] in approximately three months, (90 days) he will at that time be able to assist in his defense in any other legal matters pending. Until such time we affirm that he is temporarily [REDACTED] and cannot participate in any court ordered criminal matters.

Thank you in advance for your cooperation and compassion

If there are any questions or if we can be of further assistance, please do not hesitate to contact us.

Respectfully Submitted,

Randal W. Maxey, MD, PhD
Angela Moore-Hodge, PA-C, MS

JOHN P. REILLY, ESQ.
One Hadley Avenue, P.O. Box 4748
Attorney I.D. No. 015041980
Toms River, NJ 08754
(732) 244-5100, john@johnreillylaw.com
Attorney for Defendant, Richard Hone

THE STATE OF NEW JERSEY,

Plaintiff,

vs.

RICHARD HONE,

Defendant.

SUPERIOR COURT OF NEW JERSEY
OCEAN COUNTY
LAW DIVISION / CRIMINAL PART

CASE NO. 20000532

COMPLAINT-WARRANT NO. 1506-W-2020-116

Criminal Action

DEFENDANT'S ATTORNEY'S THIRD
SUPPLEMENTAL CERTIFICATION IN SUPPORT OF
DEFENDANT'S REMAINING MOTIONS FOR ORDER
(1) TRANSFERRING VENUE OF THE
PROSECUTION OF THE CRIMINAL COMPLAINT
OUT OF OCEAN COUNTY TO A VENUE DEEMED
MOST APPROPRIATE IN KEEPING WITH THE
RULES OF COURT, AND (2) REMOVING/
DISQUALIFYING THE OCEAN COUNTY
PROSECUTOR'S OFFICE FROM FURTHER
PROSECUTION OF THE CRIMINAL COMPLAINT.

I, JOHN P. REILLY, ESQ., do hereby certify to the following:

1. I am an Attorney at Law of the State of New Jersey
representing the defendant, RICHARD HONE (hereafter the defendant), for the
above captioned matter and as such am fully familiar with the substance of
this Certification.

2. In effort to provide a complete record in this matter, please
see the attached additional lettered Exhibits as relate to this matter:

- EE. 8/28/2020 Order of Monmouth County Assignment Judge Lisa P. Thornton
transferring venue of the captioned matters from Monmouth County to
Ocean County for reason that named defendants to same include Judges
in the Monmouth Vicinage. In this regard, it is to be noted that with
same, all seven law division matters as initiated by the defendant
are now pending in Ocean County (see also, previously submitted
Exhibit Z where same reason for transfer is expressed).
- FF. 10/5/2020 Order of the Honorable Marlene Lynch Ford, A.J.S.C., as
entered upon decision of 8/28/2020, granting defendant's motion for
her recusal.

- GG. Defendant's paperwork as to his civilian criminal complaints as filed by defendant with the Seaside Heights Municipal Court on 11/16/2020 and as brought against: **(1)** Marlene Lynch Ford **(2)** Ocean County Prosecutors Office, Taylor Toscano, Brad Billhimer, and **(3)** Kathryn Morris, DAG. In this regard, in telephone conversation of 12/7/2020 with Ms. Patti Germander, Seaside Heights Municipal Court Administrator, I was advised: **(1)** That the Seaside Heights Municipal Court does not make determinations of probable cause upon proposed civilian complaints, and normally refer same to the Ocean County Prosecutor's Office upon receipt, and **(2)** in light of the named defendants, it is as of now unknown to whom same will be referred, and **(3)** she is currently awaiting direction from her Division Manager, Mr. Joseph Scalma, on how she is to proceed upon same.
- HH. Taylor E. Toscano correspondence date 11/18/2020 and referred to Notice of Motion to Revoke Pretrial Release ("the State's Motion to Revoke", please see the 26 pages of Exhibits referred to therein as filed on E-Courts).
- II. Defendant's 11/18/2020 response to the State's Motion to Revoke.
- JJ. Defendant's 11/19/2020 1st supplemental response to the State's Motion to Revoke.
- KK. Defendant's 11/19/2020 2nd supplemental response to the State's Motion to Revoke.
- LL. 11/20/2020 Ms. Taylor Toscano, A.P. e-mail wherein she advises: "I am not inclined to withdraw my motion to revoke just yet."

3. With reference to previously submitted **Exhibit BB**, the Defendant advises to the best of in knowledge and belief that subsequent to same the Hon. Marlene Lynch Ford's has dismissed 4 complaints, although I cannot say for certain why, and that 5 complaints remain pending for which he is involved in an ongoing dispute as to the Court's ordering the waiver of fees for service.

I 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.

Respectfully submitted,
S/John P. Reilly

Dated: December 7, 2020

JOHN P. REILLY, ESQ.
Attorney for defendant,
Richard Hone



COMPLAINT INFORMATION FORM

Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.

Defendant's Name: Martene Lynch-Bell
Defendant's Address: 40 120 Hooper Ave, Toms River, NJ 08754

Defendant's Phone # (if known): N/A

Defendant's Date of Birth (if known): N/A

Defendant's Driver's License # (if known): N/A State

If this is a motor vehicle complaint, list license plate # of other vehicle: State

Description of vehicle (if known): N/A

Names and addresses of witnesses (use additional paper if necessary):

Your Name (you are the complainant): Richard Hone

Your Address: Br Mailing - 40 Stuart Santiago

Your Telephone #: [REDACTED] E-mail: [REDACTED]

307
Grove ST.
Rt 44 Wm
07065

FOR COURT USE ONLY

Court Administrator/Deputy Initials: Date:

Corresponding complaint #'s:

(Every request requires the filing of a complaint.)

November 2010

- GG -



CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

State of New Jersey
County:

Date of Incident: June 2020 to Current

Location of Incident: Central Ave Municipality: Seaside Heights

I offer the following facts and information to establish probable cause in this

Complaint against MARLENE Lynch - for
(Defendant's Name)

Whom I would like to charge with NJ 2C:30-2
(List Statute(s) or Ordinance(s))

How do you know the identity of the person you are charging? She has violated my
CIVIL RIGHTS OVER

Describe incident in detail - **USE ONLY THE LINES BELOW**

20X

ATTACHED
CERTIFICATION
(fully executed)

Certification: I 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.

Signature of Complaining Witness

Date

-GG-

Richard Hone, Ph [REDACTED]
C/O Stuart Santiago, Esq.
307 Grove St. Rahway NJ 07065
[REDACTED]

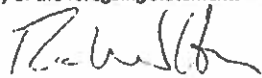
CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

RICHARD HONE, duly of age, does certify and say:

I am certifying that Marlene Lynch-Ford, a Judge in Ocean County, has committed the crimes of Official Misconduct under NJ 2C 30:2. These crimes have been ongoing since 2015 (the original charge of holding a Trial without me waiving me Right to be tried in absentia, which must be done in Family Court, and without counsel, which is so unbelievable it is impossible to most people that it could even happen, but it did, and she Knew what she was doing was completely illegal and criminal, is not included here and will be filed shortly).

1. Continues to enforce an order from February 9, 2016 that she is completely aware has NEVER BEEN SERVED PROPERLY under NJ Court Rule 1.5, the crime of Official Misconduct pursuant to NJ 2C 30:2.
2. Official Misconduct for maliciously, knowingly, purposefully never issuing FEE WAIVERS on any of my Civil Rights lawsuits of which she is a defendant in 4 or 5.

I swear the above statements made by me are true to the best of my belief and knowledge. If any of the foregoing statements made by me are willfully false, I am subject to punishment.


Richard Hone

11-14-20
Date:



COMPLAINT INFORMATION FORM

Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.

Defendant's Name: OCEAN PROSECUTOR OFFICE, TAYLOR TOWNSHIP, BUCAR
Defendant's Address: 119 PROPER AVE ET AL;
Defendant's Phone # (if known): N/A John +
Defendant's Date of Birth (if known): N/A Jane Doe
Defendant's Driver's License # (if known): N/A 1-700

If this is a motor vehicle complaint, list license plate # of other vehicle: _____
State: _____

Description of vehicle (if known): N/A

Names and addresses of witnesses (use additional paper if necessary):

Your Name (you are the complainant): RICHARD JONE

Your Address: 607 MARLIN DR STUART SMITHSON, KS

Your Telephone #: _____ E-mail: _____

FOR COURT USE ONLY

Court Administrator/Deputy initials: _____ Date: _____

Corresponding complaint #'s: _____

(Every request requires the filing of a complaint.)



CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

State of New Jersey

County: June

Date of Incident: July 2020 - Current

Location of Incident: Central Ave

Municipality: Seaside Heights

I offer the following facts and information to establish probable cause in this

Complaint against OC Properties of NJ, TAP/ TISCARD, For Bill

(Defendant's Name)

Whom I would like to charge with NJ 2C:30-2

(List Statute(s) or Ordinance(s))

How do you know the identity of the person you are charging? Corrupt prosecutors

I have in contact with

Describe incident in detail - **USE ONLY THE LINES BELOW**

CERTIFICATION

ATTACHED

(Bills Expected)

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

Signature of Complaining Witness John J. H.

Date 11-14-20

Richard Hone, Ph# [REDACTED]
C/O Stuart Santiago, Esq.
307 Grove St. Rahway NJ 07065
[REDACTED]

CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

RICHARD HONE, duly of age, does certify and say:

1. Charging me with a crime they have full knowledge the victim was not in Ocean county at the time, and after seeing Proof, refusing to dismiss it.
2. Enforcing an order from 2016 they have full knowledge has never been properly, namely the "no-contact" Order of 2-16-16, which she is in possession of a copy of, and relied on it in a hearing in Burlington County, and knows the clause regarding "email, and to give my address in 2 weeks (which they already had, and were told to send to my LKA) is NOT service under NJ R. 1.5, and the contempt of that Order was dismissed anyway, which she also has full knowledge of.
3. Have FULL KNOWLEDGE I was tried in absentia and without counsel in 2015 and does nothing, even though she was sent a letter asking an investigator from the Prosecutors office to contact me on October 2, 2020 which was a cover letter to the 3rd Amended Federal Civil Rights lawsuit she is a defendant in with billhimer, lynch-ford, etc.

I swear the above statements made by me are true to the best of my belief and knowledge. If any of the foregoing statements made by me are willfully false, I am subject to punishment.


Richard Hone 11-14-20
Date:



COMPLAINT INFORMATION FORM

Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.

Defendant's Name: KATHRYN MORRIS, D/A G
Defendant's Address: 25 W. MARKET ST. TRENTON 08625

Defendant's Phone # (if known): N/A

Defendant's Date of Birth (if known): N/A

Defendant's Driver's License # (if known): N/A State _____

If this is a motor vehicle complaint, list license plate # of other vehicle: _____ State _____

Description of vehicle (if known): N/A

Names and addresses of witnesses (use additional paper if necessary):

Your Name (you are the complainant): THOMAS HORR

Your Address: 60 MARLIN 40 STREET AUBURN, ESSEX, MA 01801

Your Telephone #: [REDACTED] E-mail: [REDACTED] 307 GARDEN ST TRENTON 08625

FOR COURT USE ONLY

Court Administrator/Deputy Initials: _____ Date: _____

Corresponding complaint #'s: _____

(Every request requires the filing of a complaint.)



CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

State of New Jersey
County:

Date of Incident: OCT - Current 2020

Location of Incident: Centra Ave Municipality: Sp. Boro H

I offer the following facts and information to establish probable cause in this

Complaint against KATHRYN MORRIS DK
(Defendant's Name)

Whom I would like to charge with NJ 2C 30
(List Statute(s) or Ordinance(s))

How do you know the identity of the person you are charging? State's 1st
for the 1st

Describe Incident in detail - USE ONLY THE LINES BELOW

CERTIFICATION

+

EXHIBIT 1-2

ATTACHED

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

Signature of Complaining Witness

Date

Richard H 11/14/20

Richard Hone, Ph# [REDACTED]
C/O Stuart Santiago, Esq.
307 Grove St. Rahway NJ 07065
[REDACTED]

CERTIFICATION IN SUPPORT OF PROBABLE CAUSE

RICHARD HONE, duly of age, does certify and say:

1. Forged my signature on a Certified Mail form, emailed it to me in Seaside Heights, submitted it to the court in Burlington in front of Judge Arrington, got caught, had the opportunity to rectify it, refused, and now needs to be charged with NJ 2C 30-2 Official Misconduct.

I swear the above statements made by me are true to the best of my belief and knowledge. If any of the foregoing statements made by me are willfully false, I am subject to punishment.



Richard Hone

11-16-20
Date:

EXHIBIT 1-2
ATTACHED

• COMPLETE ITEMS 1, 2, AND 3.

- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

CERTIFIED MAIL - RETURN RECEIPT, NO. 1

7015 0640 0001 2567 0884

Richard Hone
24 Johnston Ave
West Brick, NJ 08724



9590 9402 4976 9063 5347 43

2. Article Number (Transfer from service label)

7015 0640 0001 2567 0884

☒ Agent ☐ Addressee	
B. Received by (Printed Name) H. H. H.	C. Date of Delivery JUN 17 2015
D. Is delivery address different from item 1? If YES, enter delivery address below	
☐ Yes ☐ No	
3. Service Type ☐ Adult Signature ☐ Adult Signature Restricted Delivery ☐ Certified Mail ☐ Certified Mail Restricted Delivery ☐ Collect on Delivery ☐ Collect on Delivery Restricted Delivery ☐ Insured Mail ☐ Insured Mail Restricted Delivery (over \$500)	
☐ Priority Mail Express® ☐ Registered Mail™ ☐ Registered Mail Restricted Delivery ☐ Return Receipt for Merchandise ☐ Signature Confirmation™ ☐ Signature Confirmation Restricted Delivery	

Khajezadeh, Dina

From: eCourts.Mailbox@njcourts.gov
Sent: Tuesday, December 8, 2020 4:40 PM
To: Toscano, Taylor; JOHN@JOHNREILLYLAW.COM; OPD.OCEAN@OPD.NJ.GOV; OCPOCourtNotices
Subject: NJ eCourts Scheduling Notification - Criminal Case OCN-20-000532

Superior Court of New Jersey - Ocean County

The following scheduling notice is being sent from the Criminal Division in Ocean County on 12/08/2020 at 4:39:44 PM:

Defendant Name: RICHARD W HONE

Case Caption: STATE OF NEW JERSEY VS RICHARD HONE

Case Number: [OCN-20-000532](#)

Docket Text: REVOKE RELEASE [\[CRM2020960720\]](#) is scheduled for 01:30 PM on 12/09/2020 with Judge Michael Collins at OCEAN SUPERIOR COURT, 120 HOOPER AVE, TOMS RIVER, NJ. Court Room 0016

Transaction ID: [CRM20201015019](#)

Notice has been electronically sent to:

Prosecuting Attorney	Taylor E Toscano	TTOSCANO@CO.OCEAN.NJ.US
Attorney for Defendant Richard W Hone	John P Reilly	JOHN@JOHNREILLYLAW.COM
Public Defender	Ocean County	OPD.OCEAN@OPD.NJ.GOV
County Prosecutor	Ocean County	OCPOCOURTNOTICES@CO.OCEAN.NJ.US

Notice has NOT been electronically sent to:

Prosecuting Attorney	Taylor Toscano
----------------------	----------------

[Login](#) to eCourts to view the case jacket. You will need a valid user ID to view the submitted documents.

For questions, please [contact](#) the Criminal Division in Ocean County.

This email is for notification purposes only and was sent from a notification-only address that cannot accept incoming email. **Please do not reply to this message.**

Khajezadeh, Dina

From: Kimberly Romagnuolo <Kimberly.Romagnuolo@njcourts.gov>
Sent: Wednesday, December 9, 2020 11:05 AM
To: Toscano, Taylor
Subject: RE: [External]RE: Richard Hone Motion W2020-116-1506

Thank you Taylor

From: Toscano, Taylor <TToscano@co.ocean.nj.us>
Sent: Wednesday, December 9, 2020 10:59 AM
To: Alicia Cook <alicia.cook@njcourts.gov>; Kimberly Romagnuolo <Kimberly.Romagnuolo@njcourts.gov>
Cc: Jennifer Frey <jennifer.frey@njcourts.gov>; John@johnreillylaw.com
Subject: [External]RE: Richard Hone Motion W2020-116-1506

CAUTION: This email originated from outside the Judiciary organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi everyone,

See attached proposed Order.

Mr. Reilly, please advise if you have any objections to said Order.

Thank you,
Taylor



Taylor Toscano
Assistant Prosecutor
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2741
Email: ttoscano@co.ocean.nj.us

Warning: This message is intended for the user of the individual or entity to which it is addressed and may contain information that is privileged, law enforcement sensitive, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by reply or by telephone (732)929-2027 Ext. 2741 and immediately delete this message and all of its attachments.

FOR OFFICIAL USE ONLY - LAW ENFORCEMENT SENSITIVE

From: Alicia Cook <alicia.cook@njcourts.gov>
Sent: Wednesday, December 9, 2020 9:29 AM
To: Kimberly Romagnuolo <Kimberly.Romagnuolo@njcourts.gov>
Cc: Jennifer Frey <jennifer.frey@njcourts.gov>; Toscano, Taylor <TToscano@co.ocean.nj.us>
Subject: RE: Richard Hone Motion W2020-116-1506

Good Morning,

I believe Ms. Toscano is drafting the Order for yesterday's motions. I have copied her to this email.

Thank you,
Alicia

Alicia N. Cook

Law Clerk to the Honorable Marlene Lynch Ford, A.J.S.C.
Ocean County Courthouse Historic Courtroom 1
118 Washington Street
Toms River, N.J. 08753
Tel: 732-504-0700 ext. 64462
Email: Alicia.Cook@njcourts.gov

From: Kimberly Romagnuolo <Kimberly.Romagnuolo@njcourts.gov>
Sent: Wednesday, December 9, 2020 9:10 AM
To: Alicia Cook <alicia.cook@njcourts.gov>
Cc: Jennifer Frey <jennifer.frey@njcourts.gov>
Subject: Richard Hone Motion W2020-116-1506

Good Morning,

I clerked yesterday's Motion with Judge Baxter On Richard Hone.
If you can please Let me know when Judge's Order complete and scanned in,
Or you can also email me a copy and I will close out the motion when complete.

Thankyou
Kimberly Romagnuolo JC3

**BRADLEY D. BILLHIMER
OCEAN COUNTY PROSECUTOR
P.O. BOX 2191
TOMS RIVER, NEW JERSEY 08754
(732) 929-2027
TAYLOR TOSCANO, ASSISTANT PROSECUTOR**

STATE OF NEW JERSEY	:	SUPERIOR COURT OF NEW OCEAN COUNTY-LAW DIVISION
	:	
V.	:	<u>CRIMINAL ACTION</u>
	:	
RICHARD HONE,	:	CASE No. 20000532
Defendant.	:	ORDER

THIS MATTER having been brought before the Court by John P. Reilly, Attorney for the defendant, and with Taylor E. Toscano, Assistant Prosecutor appearing on behalf of the State; and the Court having considered the papers submitted and arguments of counsel, and for good cause shown;

It is on this 8th day of December 2020 hereby

ORDERED, that defendant's application to transfer venue of the prosecution of complaint W-2020-116-1506 out of Ocean County is **DENIED**; and

IT IS FURTHER ORDERED, that the defendant's application to remove and disqualify the Ocean County Prosecutor's Office from the further prosecution of complaint W-2020-116-1506 if **DENIED**.

Linda Baxter, J.S.C.

From: John@johnreillylaw.com
Sent: Wednesday, December 9, 2020 11:13 AM
To: Toscano, Taylor; Alicia Cook; Kimberly Romagnuolo
Cc: Jennifer Frey
Subject: RE: Richard Hone Motion W2020-116-1506

Dear All,

For purpose of clarity, I would amend the order to state that said motions had been the subject of yesterday's hearing before Judge Baxter with Ms. Toscano and myself then appearing; that the last paragraph replace the word "if" with "is", and that the date of the Order properly be that on which same is executed by Judge Baxter. Otherwise, same is acceptable.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: Richard Hone Motion W2020-116-1506
From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>
Date: Wed, December 09, 2020 10:58 am
To: Alicia Cook <alicia.cook@njcourts.gov>, Kimberly Romagnuolo <Kimberly.Romagnuolo@njcourts.gov>
Cc: Jennifer Frey <jennifer.frey@njcourts.gov>, "John@johnreillylaw.com" <John@johnreillylaw.com>

Hi everyone,

See attached proposed Order.

Mr. Reilly, please advise if you have any objections to said Order.

Thank you,
Taylor



Taylor Toscano
Assistant Prosecutor
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2741
Email: ttoscano@co.ocean.nj.us

Warning: This message is intended for the user of the individual or entity to which it is addressed and may contain information that is privileged, law enforcement sensitive, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by reply or by telephone (732)929-2027 Ext. 2741 and immediately delete this message and all of its attachments.

FOR OFFICIAL USE ONLY - LAW ENFORCEMENT SENSITIVE

From: Alicia Cook <alicia.cook@njcourts.gov>
Sent: Wednesday, December 9, 2020 9:29 AM
To: Kimberly Romagnuolo <Kimberly.Romagnuolo@njcourts.gov>
Cc: Jennifer Frey <jennifer.frey@njcourts.gov>; Toscano, Taylor <TToscano@co.ocean.nj.us>
Subject: RE: Richard Hone Motion W2020-116-1506

Good Morning,

I believe Ms. Toscano is drafting the Order for yesterday's motions. I have copied her to this email.

Thank you,
Alicia

Alicia N. Cook
Law Clerk to the Honorable Marlene Lynch Ford, A.J.S.C.
Ocean County Courthouse Historic Courtroom 1
118 Washington Street
Toms River, N.J. 08753
Tel: 732-504-0700 ext. 64462
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Subject: Richard Hone Motion W2020-116-1506

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If you can please Let me know when Judge's Order complete and scanned in,
Or you can also email me a copy and I will close out the motion when complete.

Thankyou
Kimberly Romagnuolo JC3

Khajezadeh, Dina

From: John@johnreillylaw.com
Sent: Tuesday, December 22, 2020 11:52 AM
To: Toscano, Taylor; Alicia Cook; Kimberly Romagnuolo
Cc: Jennifer Frey
Subject: RE: Richard Hone Motion W2020-116-1506

Dear All,

Please advise of the status of the the below discussed Order.

Thank you,

John Reilly

Dear All,

For purpose of clarity, I would amend the order to state that said motions had been the subject of yesterday's hearing before Judge Baxter with Ms. Toscano and myself then appearing; that the last paragraph replace the word "if" with "is", and that the date of the Order properly be that on which same is executed by Judge Baxter. Otherwise, same is acceptable.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: Richard Hone Motion W2020-116-1506
From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>
Date: Wed, December 09, 2020 10:58 am
To: Alicia Cook <alicia.cook@njcourts.gov>, Kimberly Romagnuolo
<Kimberly.Romagnuolo@njcourts.gov>
Cc: Jennifer Frey <jennifer.frey@njcourts.gov>, "John@johnreillylaw.com"
<John@johnreillylaw.com>

Hi everyone,

See attached proposed Order.

Mr. Reilly, please advise if you have any objections to said Order.

Thank you,
Taylor



Taylor Toscano
Assistant Prosecutor
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2741
Email: ttoscano@co.ocean.nj.us

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Cc: Jennifer Frey <jennifer.frey@njcourts.gov>; Toscano, Taylor <TToscano@co.ocean.nj.us>
Subject: RE: Richard Hone Motion W2020-116-1506

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Alicia

Alicia N. Cook

Law Clerk to the Honorable Marlene Lynch Ford, A.J.S.C.
Ocean County Courthouse Historic Courtroom 1
118 Washington Street
Toms River, N.J. 08753
Tel: 732-504-0700 ext. 64462
Email: Alicia.Cook@njcourts.gov

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Subject: Richard Hone Motion W2020-116-1506

Good Morning,

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If you can please Let me know when Judge's Order complete and scanned in,
Or you can also email me a copy and I will close out the motion when complete.

Thankyou
Kimberly Romagnuolo JC3

Khajezadeh, Dina

From: John@johnreillylaw.com
Sent: Thursday, December 31, 2020 10:43 AM
To: Toscano, Taylor; Alicia Cook; Kimberly Romagnuolo
Cc: Jennifer Frey
Subject: RE: Richard Hone Motion W2020-116-1506

Dear All,

This is to advise that the form of Order submitted below this date is acceptable to the defendant.

Thank you,

John Reilly

----- Original Message -----

Subject: RE: Richard Hone Motion W2020-116-1506
From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>
Date: Thu, December 31, 2020 10:18 am
To: "John@johnreillylaw.com" <John@johnreillylaw.com>, Alicia Cook <alicia.cook@njcourts.gov>, Kimberly Romagnuolo <Kimberly.Romagnuolo@njcourts.gov>
Cc: Jennifer Frey <jennifer.frey@njcourts.gov>

Mr. Reilly,

Attached you'll find another draft order, with changes added in by the Court. Please let everyone know if it is acceptable to you. Thank you.

Taylor



Taylor Toscano
Assistant Prosecutor
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2741
Email: ttoscano@co.ocean.nj.us

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From: John@johnreillylaw.com <John@johnreillylaw.com>
Sent: Tuesday, December 22, 2020 11:52 AM
To: Toscano, Taylor <TToscano@co.ocean.nj.us>; Alicia Cook <alicia.cook@njcourts.gov>; Kimberly Romagnuolo <Kimberly.Romagnuolo@njcourts.gov>
Cc: Jennifer Frey <jennifer.frey@njcourts.gov>
Subject: RE: Richard Hone Motion W2020-116-1506

Dear All,

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Thank you,

John Reilly

Dear All,

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Thank you,

John Reilly

----- Original Message -----

Subject: RE: Richard Hone Motion W2020-116-1506

From: "Toscano, Taylor" <TToscano@co.ocean.nj.us>

Date: Wed, December 09, 2020 10:58 am

To: Alicia Cook <alicia.cook@njcourts.gov>, Kimberly Romagnuolo
<Kimberly.Romagnuolo@njcourts.gov>

Cc: Jennifer Frey <jennifer.frey@njcourts.gov>, "John@johnreillylaw.com"
<John@johnreillylaw.com>

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Mr. Reilly, please advise if you have any objections to said Order.

Thank you,
Taylor



Taylor Toscano
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From: Alicia Cook <alicia.cook@njcourts.gov>

Sent: Wednesday, December 9, 2020 9:29 AM

To: Kimberly Romagnuolo <Kimberly.Romagnuolo@njcourts.gov>
Cc: Jennifer Frey <jennifer.frey@njcourts.gov>; Toscano, Taylor
<TToscano@co.ocean.nj.us>
Subject: RE: Richard Hone Motion W2020-116-1506

Good Morning,

I believe Ms. Toscano is drafting the Order for yesterday's motions. I have copied her to this email.

Thank you,
Alicia

Alicia N. Cook

Law Clerk to the Honorable Marlene Lynch Ford, A.J.S.C.
Ocean County Courthouse Historic Courtroom 1
118 Washington Street
Toms River, N.J. 08753
Tel: 732-504-0700 ext. 64462
Email: Alicia.Cook@njcourts.gov

From: Kimberly Romagnuolo <Kimberly.Romagnuolo@njcourts.gov>
Sent: Wednesday, December 9, 2020 9:10 AM
To: Alicia Cook <alicia.cook@njcourts.gov>
Cc: Jennifer Frey <jennifer.frey@njcourts.gov>
Subject: Richard Hone Motion W2020-116-1506

Good Morning,

I clerked yesterday's Motion with Judge Baxter On Richard Hone.

If you can please Let me know when Judge's Order complete and scanned in,
Or you can also email me a copy and I will close out the motion when complete.

Thankyou
Kimberly Romagnuolo JC3

**BRADLEY D. BILLHIMER
OCEAN COUNTY PROSECUTOR
P.O. BOX 2191
TOMS RIVER, NEW JERSEY 08754
(732) 929-2027
TAYLOR TOSCANO, ASSISTANT PROSECUTOR**

STATE OF NEW JERSEY	:	SUPERIOR COURT OF NEW OCEAN COUNTY-LAW DIVISION
	:	
V.	:	<u>CRIMINAL ACTION</u>
	:	
RICHARD HONE,	:	CASE No. 20000532
Defendant.	:	ORDER

THIS MATTER having been brought before the Court by John P. Reilly, Attorney for the defendant, and with Taylor E. Toscano, Assistant Prosecutor appearing on behalf of the State; and the Court having considered the papers submitted and arguments of counsel on December 8, 2020 and having made findings of fact and conclusions of law immediately thereafter, and for good cause shown;

It is on this ____th day of _____ 20__ hereby

ORDERED, that defendant's application to transfer venue of the prosecution of complaint W-2020-116-1506 out of Ocean County is **DENIED**; and

IT IS FURTHER ORDERED, that the defendant's application to remove and disqualify the Ocean County Prosecutor's Office from the further prosecution of complaint W-2020-116-1506 is **DENIED**.

Linda Baxter, J.S.C.

Sent to defendant on December 31, 2020, pursuant to Rule 4:42-1(c).