

Khajezadeh, Dina

From: Krysta Hernandez <krysta.hernandez@njcourts.gov>
Sent: Tuesday, February 11, 2020 3:13 PM
To: OCPOCourtNotices; 'opd.ocean@opd.nj.gov'
Cc: 'Melissa A. Barbier'; Armstrong , Robert; Maria Derosé; Christopher Williams; Luisa Ojeda; Theresa Tamburro; maria.gonzales@opd.nj.gov; Toscano, Taylor; Carr, Kimberly; Joensen, Brooke; Vita.Mennie@opd.nj.gov; Carol.Wentworth@opd.nj.gov; Jennifer Frey; Kellie Duff; Kelly, Timothy; Leimbach, Andrew; Heather Hynes; Armstrong , Michelle; Agustina Lane; Michelle Tierney; Burke, Stephen; 'sheila.tobin@opd.nj.gov'; Betts, Allison; OCN PreTrial; Rita Ferrantelli; Gomez, Ruben; Froberg , Carol; Fennessy, Lauren; Schuler, Monica; Giordano, Debra; Miljenovic , Patricia; Burke, Kaitlyn; Bryce , Hillary; Coughlin, Bridget; Melanie.Drozjock@opd.nj.gov; Becker, Alexander; Monica Mancuso; Jennifer Hausmann; Michael.vito@opd.nj.gov; Jessica Strugibenetti; Moscato, Genna; louis.vito@opd.nj.gov; frank.mccarthy@opd.nj.gov; Linda Casserly; Christie Maurer; Suzan Korkusuz; Michael Mcguire
Subject: Detention Hearing Updates
Attachments: 2-10 WEEK.docx

Attached please find the updated schedule for this week.

Thank you,

Krysta Hernandez, JC3
Criminal Case Scheduling
Ocean County Justice Complex
732-504-0700 ext. 64289

WEEK OF: February 10, 2020

DA4/18/2024 1:21 PM

DETENTION HEARINGS
& Judge Daniels' VIOLATION HEARINGS

Detention Hearings are usually before Judge Daniels – courtroom 12 - unless otherwise specified

WEEK OF: February 10, 2020

DAY	DATE	TIME	DEFENDANT	COMPLAINT #(s)	FIRST APP. NEEDED	NOTES and / or OTHER JUDGE
MON	2/10	9:00 AM	CARLOS MARTINEZ	W-2020-152-1514	YES	JUDGE DANIELS – CT. 12 SPANISH INT.
"	"	"	ERIC GILLISH	W-2020-43-1516	YES	
"	"	"	JASON SAMARITANO	W-2020-239-1507 W-2020-243-1507	YES YES	
"	"	"	STEVEN HERACLIO- ARGUELLO	W-2020-153-1514	YES	
"	"	"	KRAIG SORENSON	W-2020-149-1514 W-2020-150-1514 W-2020-139-1514	YES YES NO	DETENTION DETENTION VOM & MOTION TO REVOKE
"	"	"	JOSEPH WITTY, JR.	W-2020-13-1520	YES	
"	"	"	SHANECA DECARVALHO	W-2020-42-1505 W-2020-219-1507 W-2020-220-1507 W-2020-132-1514 W-2020-218-1507 W-2020-44-1505	YES YES YES YES YES YES	

WEEK OF: February 10, 2020

MON	2/10	9:00 AM	JENNIFER OLAH	W-2019-479-1506	NO	JUDGE DANIELS – CT. 12 VOM & MOTION TO REVOKE
TUES	2/11	9:00 AM	MICHAEL CUIFFREDA	W-2020-22-1532	YES	JUDGE RYAN – CT. 7
"	"	"	JAMES ROGERS	W-2020-53-1518	YES	
"	"	"	RICHARD SANDERS	W-2019-400-1514	YES	
"	"	"	STEVEN SEARLES	W-2020-20-1532 W-2019-432-1516	YES NO	DETENTION VOM & MOTION TO REVOKE
"	"	"	JOHN PANAGAKOS	W-2020-39-1512 W-2019-307-1512 W-2019-188-1512 W-2018-309-1512	YES NO NO NO	DETENTION MOTION TO REVOKE MOTION TO REVOKE MOTION TO REVOKE
"	"	"	KENNETH JAMISON	W-2020-252-1507	YES	
"	"	"	FRANK STOCHER	W-2019-550-1518 W-2019-484-1518	NO NO	VOM & MOTION TO REVOKE VOM & MOTION TO REVOKE
WED	2/12	9:30 AM	RAYMOND MANGLE	W-2020-60-1533	YES	JUDGE DANIELS – CT. 12
"	"	"	MASHON WILSON	W-2020-160-1514 W-2020-162-1514 W-2020-163-1514 W-2020-164-1514 W-2019-224-1514	YES YES YES YES NO	DETENTION DETENTION DETENTION DETENTION VOM & MOTION TO REVOKE
"	"	"	NICHOLAS DOBIAS	W-2020-46-1516 W-2019-169-1532	YES NO	DETENTION MOTION TO REVOKE
"	"	"	ANTHONY TRINIDAD	W-2020-22-1530	YES	ATLANTIC WRIT; ATTY: C. CIAK
"	"	"	TYLER MYLES	W-2020-48-1505 W-2019-500-1505	YES NO	DETENTION MOTION TO REVOKE; ATTY: A. KENNEY

WEEK OF: February 10, 2020

WED	2/12	9:30 AM	CORY RICHARD	W-2020-55-1526	YES	JUDGE DANIELS – CT. 12
"	"	"	IVAN RIVERA	W-2020-103-1514	YES	SPANISH INT.
"	"	"	ZAKIYA THOMAS	W-2020-41-1512	YES	
"	"	"	SHARON SCEA	W-2020-262-1507	YES	
"	"	"	ROBERT COHAN	W-2020-103-1506 W-2020-104-1506	NO NO	MONMOUTH WRIT; Adj. from 2/6
WED	2/12	1:30 PM	ALAN CAMISA	W-2020-254-1507	YES	JUDGE DANIELS – CT. 12
"	"	"	TYLER DIETLMEIER	W-2020-207-1507 W-2020-256-1507	YES YES	
"	"	"	SHANECA DECARVALHO	W-2020-42-1505 W-2020-219-1507 W-2020-220-1507 W-2020-132-1514 W-2020-218-1507 W-2020-44-1505	NO NO NO NO NO NO	Adj. from 2/10
"	"	"	ANTHONY CIPOLLETTI	W-2019-1250-1507	NO	VOM & MTR; ATTY: S. WILLIS
"	"	"	DAVID GIORDANO	W-2019-1948-1507	NO	VOM & MOTION TO REVOKE
THURS	2/13	9:00 AM	SANDY ESPINOSA	W-2020-261-1507	YES	JUDGE DANIELS – CT. 12
"	"	"	PETER SCHNABEL	W-2020-175-1514	YES	
"	"	"	THOMAS FOX	W-2020-267-1507	YES	
"	"	"	BRIA KROHN	W-2020-56-1526 W-2019-45-1513 W-2019-540-1511	YES NO NO	DETENTION MOTION TO REVOKE MOTION TO REVOKE
"	"	"	DAYNA ROD	W-2020-266-1507	YES	

WEEK OF: February 10, 2020

THURS	2/13	9:00 AM	MIGUEL VARGAS	W-2020-170-1514	YES	JUDGE DANIELS – CT. 12
"	"	"	AMIRAN DADESHKELIANI	W-2020-3-1531	YES	SPANISH INT. GEORGIAN INT.
"	"	"	WAYNE PRICE	W-2020-57-1526	YES	
"	"	"	NORBERTO GONZALEZ	W-2020-176-1514	YES	SPANISH INT.
"	"	"	BRENDAN WASON	W-2020-51-1505	YES	
"	"	"	URBINA FELIX	W-2020-172-1514	YES	
"	"	"	DOUGLAS DUNN	W-2017-1384-1514	NO	MOTION TO REVOKE
"	"	"	JOHN PANAGAKOS	W-2020-39-1512 W-2019-307-1512	NO NO	DETENTION; Adj. from 2/11 VOM & MOTION TO REVOKE
				W-2019-188-1512 W-2018-309-1512	NO NO	VOM & MOTION TO REVOKE VOM & MOTION TO REVOKE
"	"	"	KENNETH JAMISON	W-2020-252-1507	NO	Adj. from 2/11
THURS	2/13	9:00 AM	CHARDEL HOLMAN	W-2018-829-1507	NO	JUDGE RYAN – CT. 7
"	"	"	MICHAEL CUIFFREDA	W-2020-22-1532	NO	MOTION TO REVOKE Adj. from 2/11
THURS	2/13	3:00 PM	IMARI GUE	W-2019-597-1514	NO	JUDGE DANIELS – CT. 12
FRI	2/14	9:00 AM	JOHN COWAN	W-2020-268-1507	YES	MODIFY CONDITIONS JUDGE DANIELS – CT. 12
"	"	"	ANTHONY DILEO	W-2020-62-1533 W-2019-449-1505	YES NO	DETENTION MOTION TO REVOKE
"	"	"	JOHN DILCHER	W-2020-115-1506 W-2019-719-1506	YES NO	DETENTION MOTION TO REVOKE
"	"	"	JOSE ROMERO	W-2020-177-1514	YES	

WEEK OF: February 10, 2020

FRI	2/14	9:00 AM	MICHAEL GACHINEIRO	W-2020-118-1506	YES	JUDGE DANIELS – CT. 12
"	"	"	RICHARD HONE	W-2020-116-1506	YES	
"	"	"	DANIEL KESTER	W-2020-35-1524	YES	
FRI	2/14	11:00 AM	PAUL ARAITA	W-2019-2052-1507	NO	VIOLATIONS OF MONITORING
"	"	"	ANTONIO BEERMAN	W-2019-101-1529	NO	
"	"	"	ROBERT CAMP	W-2019-260-1505	NO	
"	"	"	MICHAEL DELIA	W-2019-53-1520	NO	
"	"	"	JUSTIN LONGSTREET	W-2019-1182-1506	NO	

Khajezadeh, Dina

From: Krysta Hernandez <krysta.hernandez@njcourts.gov>
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Cc: 'Melissa A. Barbier'; Armstrong , Robert; Maria Derosé; Christopher Williams; Luisa Ojeda; Theresa Tamburro; maria.gonzales@opd.nj.gov; Toscano, Taylor; Carr, Kimberly; Joensen, Brooke; Vita.Mennie@opd.nj.gov; Carol.Wentworth@opd.nj.gov; Jennifer Frey; Kellie Duff; Kelly, Timothy; Leimbach, Andrew; Heather Hynes; Armstrong , Michelle; Agustina Lane; Michelle Tierney; Burke, Stephen; 'sheila.tobin@opd.nj.gov'; Betts, Allison; OCN PreTrial; Rita Ferrantelli; Gomez, Ruben; Froberg , Carol; Fennessy, Lauren; Schuler, Monica; Giordano, Debra; Miljenovic , Patricia; Burke, Kaitlyn; Bryce , Hillary; Coughlin, Bridget; Melanie.Drozjock@opd.nj.gov; Becker, Alexander; Monica Mancuso; Jennifer Hausmann; Michael.vito@opd.nj.gov; Jessica Strugibenetti; Moscato, Genna; louis.vito@opd.nj.gov; frank.mccarthy@opd.nj.gov; Linda Casserly; Christie Maurer; Suzan Korkusuz; Michael Mcguire
Subject: Detention Hearing Updates
Attachments: 2-10 WEEK.docx; 2-17 WEEK.docx

Attached please find the updated schedule for this week as well as the preliminary schedule for next week.

Thank you,

Krysta Hernandez, JC3
Criminal Case Scheduling
Ocean County Justice Complex
732-504-0700 ext. 64289

WEEK OF: February 10, 2020

DAA/18/2024 1:21 PM

DETENTION HEARINGS
& Judge Daniels' VIOLATION HEARINGS*Detention Hearings are usually before Judge Daniels – courtroom 12 - unless otherwise specified***WEEK OF: February 10, 2020**

DAY	DATE	TIME	DEFENDANT	COMPLAINT #(s)	FIRST APP. NEEDED	NOTES and / or OTHER JUDGE
MON	2/10	9:00 AM	CARLOS MARTINEZ	W-2020-152-1514	YES	JUDGE DANIELS – CT. 12 SPANISH INT.
"	"	"	ERIC GILLISH	W-2020-43-1516	YES	
"	"	"	JASON SAMARITANO	W-2020-239-1507 W-2020-243-1507	YES YES	
"	"	"	STEVEN HERACLIO- ARGUELLO	W-2020-153-1514	YES	
"	"	"	KRAIG SORENSON	W-2020-149-1514 W-2020-150-1514 W-2020-139-1514	YES YES NO	DETENTION DETENTION VOM & MOTION TO REVOKE
"	"	"	JOSEPH WITTY, JR.	W-2020-13-1520	YES	
"	"	"	SHANEECA DECARVALHO	W-2020-42-1505 W-2020-219-1507 W-2020-220-1507 W-2020-132-1514 W-2020-218-1507 W-2020-44-1505	YES YES YES YES YES YES	

WEEK OF: February 10, 2020

MON	2/10	9:00 AM	JENNIFER OLAH	W-2019-479-1506	NO	JUDGE DANIELS – CT. 12 VOM & MOTION TO REVOKE
TUES	2/11	9:00 AM	MICHAEL CUIFFREDA	W-2020-22-1532	YES	JUDGE RYAN – CT. 7
"	"	"	JAMES ROGERS	W-2020-53-1518	YES	
"	"	"	RICHARD SANDERS	W-2019-400-1514	YES	
"	"	"	STEVEN SEARLES	W-2020-20-1532 W-2019-432-1516	YES NO	DETENTION VOM & MOTION TO REVOKE
"	"	"	JOHN PANAGAKOS	W-2020-39-1512 W-2019-307-1512 W-2019-188-1512 W-2018-309-1512	YES NO NO NO	DETENTION MOTION TO REVOKE MOTION TO REVOKE MOTION TO REVOKE
"	"	"	KENNETH JAMISON	W-2020-252-1507	YES	
"	"	"	FRANK STOCHEL	W-2019-550-1518 W-2019-484-1518	NO NO	VOM & MOTION TO REVOKE VOM & MOTION TO REVOKE
WED	2/12	9:30 AM	RAYMOND MANGLE	W-2020-60-1533	YES	JUDGE DANIELS – CT. 12
"	"	"	MASHON WILSON	W-2020-160-1514 W-2020-162-1514 W-2020-163-1514 W-2020-164-1514 W-2019-224-1514	YES YES YES YES NO	DETENTION DETENTION DETENTION DETENTION VOM & MOTION TO REVOKE
"	"	"	NICHOLAS DOBIAS	W-2020-46-1516 W-2019-169-1532	YES NO	DETENTION MOTION TO REVOKE
"	"	"	ANTHONY TRINIDAD	W-2020-22-1530	YES	ATLANTIC WRIT; ATTY: C. CIAK
"	"	"	TYLER MYLES	W-2020-48-1505 W-2019-500-1505	YES NO	DETENTION MOTION TO REVOKE; ATTY: A. KENNEY

WEEK OF: February 10, 2020

WED	2/12	9:30 AM	CORY RICHARD	W-2020-55-1526	YES	JUDGE DANIELS – CT. 12
"	"	"	IVAN RIVERA	W-2020-103-1514	YES	SPANISH INT.
"	"	"	ZAKIYA THOMAS	W-2020-41-1512	YES	
"	"	"	SHARON SCEA	W-2020-262-1507	YES	
"	"	"	ROBERT COHAN	W-2020-103-1506 W-2020-104-1506	NO NO	MONMOUTH WRIT; Adj. from 2/6
WED	2/12	1:30 PM	ALAN CAMISA	W-2020-254-1507	YES	JUDGE DANIELS – CT. 12
"	"	"	TYLER DIETLMEIER	W-2020-207-1507 W-2020-256-1507	YES YES	
"	"	"	SHANECA DECARVALHO	W-2020-42-1505 W-2020-219-1507 W-2020-220-1507 W-2020-132-1514 W-2020-218-1507 W-2020-44-1505	NO NO NO NO NO NO	Adj. from 2/10
"	"	"	ANTHONY CIPOLLETTI	W-2019-1250-1507	NO	VOM & MTR; ATTY: S. WILLIS
"	"	"	DAVID GIORDANO	W-2019-1948-1507	NO	VOM & MOTION TO REVOKE
THURS	2/13	9:00 AM	SANDY ESPINOSA	W-2020-261-1507	YES	JUDGE DANIELS – CT. 12
"	"	"	PETER SCHNABEL	W-2020-175-1514	YES	
"	"	"	DAYNA ROD	W-2020-266-1507	YES	
"	"	"	MIGUEL VARGAS	W-2020-170-1514	YES	SPANISH INT.
"	"	"	AMIRAN DADESHKELIANI	W-2020-3-1531	YES	GEORGIAN INT.
"	"	"	NORBERTO GONZALEZ	W-2020-176-1514	YES	SPANISH INT.

WEEK OF: February 10, 2020

THURS	2/13	9:00 AM	CHARDEL HOLMAN	W-2018-829-1507	NO	JUDGE RYAN – CT. 7 VOM & MOTION TO REVOKE
"	"	"	MICHAEL CUIFFREDA	W-2020-22-1532	NO	Adj. from 2/11
"	"	"	URBINA FELIX	W-2020-172-1514	YES	
"	"	"	JOHN PANAGAKOS	W-2020-39-1512	NO	DETENTION; Adj. from 2/11
				W-2019-307-1512	NO	VOM & MOTION TO REVOKE
				W-2019-188-1512	NO	VOM & MOTION TO REVOKE
				W-2018-309-1512	NO	VOM & MOTION TO REVOKE
"	"	"	KENNETH JAMISON	W-2020-252-1507	NO	Adj. from 2/11
"	"	"	THOMAS FOX	W-2020-267-1507	YES	
"	"	"	BRIA KROHN	W-2020-56-1526	YES	DETENTION
				W-2019-45-1513	NO	MOTION TO REVOKE
				W-2019-540-1511	NO	MOTION TO REVOKE
THURS	2/13	1:30 PM	WAYNE PRICE	W-2020-57-1526	YES	JUDGE DANIELS – CT. 12
"	"	"	BRENDAN WASON	W-2020-51-1505	YES	
"	"	"	DOUGLAS DUNN	W-2017-1384-1514	NO	MOTION TO REVOKE
THURS	2/13	3:00 PM	IMARI GUE	W-2019-597-1514	NO	JUDGE DANIELS – CT. 12 MODIFY CONDITIONS
FRI	2/14	9:00 AM	JOHN COWAN	W-2020-268-1507	YES	JUDGE DANIELS – CT. 12
"	"	"	ANTHONY DILEO	W-2020-62-1533	YES	DETENTION
				W-2019-449-1505	NO	MOTION TO REVOKE
"	"	"	JOHN DILCHER	W-2020-115-1506	YES	DETENTION
				W-2019-710-1506	NO	MOTION TO REVOKE
"	"	"	JOSE ROMERO	W-2020-177-1514	YES	SPANISH INT.

WEEK OF: February 10, 2020

FRI	2/14	9:00 AM	MICHAEL GACHINEIRO	W-2020-118-1506	YES	JUDGE DANIELS – CT. 12
"	"	"	RICHARD HONE	W-2020-116-1506	YES	
"	"	"	DANIEL KESTER	W-2020-35-1524	YES	
"	"	"	NICHOLAS DOBIAS	W-2020-46-1516 W-2019-169-1532	NO NO	DETENTION; Adj. from 2/12 MOTION TO REVOKE
FRI	2/14	11:00 AM	PAUL ARATA	W-2019-2052-1507	NO	VIOLATIONS OF MONITORING
"	"	"	ANTONIO BEERMAN	W-2019-101-1529	NO	VOM & MTR; MONMOUTH WRIT
"	"	"	ROBERT CAMP	W-2019-260-1505	NO	Adj. from 2/7
"	"	"	MICHAEL DELIA	W-2019-53-1520	NO	VOM & MOTION TO REVOKE
"	"	"	JUSTIN LONGSTREET	W-2019-1182-1506	NO	

WEEK OF: February 17, 2020

DAA/18/2024 1:21 PM

DETENTION HEARINGS
& Judge Daniels' VIOLATION HEARINGS

Detention Hearings are usually before Judge Daniels – courtroom 12 - unless otherwise specified

WEEK OF: February 17, 2020

DAY	DATE	TIME	DEFENDANT	COMPLAINT #(s)	FIRST APP. NEEDED	NOTES and / or OTHER JUDGE
MON	2/17	NONE				PRESIDENTS' DAY – COURTS CLOSED
"	"	"				
TUES	2/18	9:00 AM	CAREY MAYO	W-2020-52-1505	YES	JUDGE DANIELS – CT. 12
"	"	"	PATRICK WILLIAMS	W-2020-11-1529	YES	
"	"	"	QUENTIN HUNT	W-2020-163-1507	YES	ESSEX WRIT
"	"	"	OMAR ALFORD	W-2020-61-1526	YES	
"	"	"	TYLER DIETLMEIER	W-2020-207-1507 W-2020-256-1507	NO NO	Adj. from 2/12
WED	2/19	9:00 AM				JUDGE RYAN – CT. 7
"	"	"				
"	"	"				

WEEK OF: February 17, 2020

WED	2/19	9:00 AM					JUDGE RYAN – CT. 7
"	"	"					
THURS	2/20	9:00 AM					JUDGE DANIELS – CT. 12
"	"	"					
"	"	"					
"	"	"					
"	"	"					
FRI	2/21	9:00 AM					JUDGE DANIELS – CT. 12
"	"	"					
"	"	"					
"	"	"					
"	"	"					
"	"	"					
FRI	2/21	11:00 AM					VIOLATIONS OF MONITORING
"	"	"					
"	"	"					
"	"	"					
"	"	"					
"	"	"					

Khajezadeh, Dina

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Sent: Thursday, February 13, 2020 3:28 PM
To: OCPOCourtNotices; 'opd.ocean@opd.nj.gov'
Cc: 'Melissa A. Barbier'; Armstrong , Robert; Maria Derose; Christopher Williams; Luisa Ojeda; Theresa Tamburro; maria.gonzales@opd.nj.gov; Toscano, Taylor; Carr, Kimberly; Joensen, Brooke; Vita.Mennie@opd.nj.gov; Carol.Wentworth@opd.nj.gov; Jennifer Frey; Kellie Duff; Kelly, Timothy; Leimbach, Andrew; Heather Hynes; Armstrong , Michelle; Agustina Lane; Michelle Tierney; Burke, Stephen; 'sheila.tobin@opd.nj.gov'; Betts, Allison; OCN PreTrial; Rita Ferrantelli; Gomez, Ruben; Froberg , Carol; Fennessy, Lauren; Schuler, Monica; Giordano, Debra; Miljenovic , Patricia; Burke, Kaitlyn; Bryce , Hillary; Coughlin, Bridget; Melanie.Drozjock@opd.nj.gov; Becker, Alexander; Monica Mancuso; Jennifer Hausmann; Michael.vito@opd.nj.gov; Jessica Strugibenetti; Moscato, Genna; louis.vito@opd.nj.gov; frank.mccarthy@opd.nj.gov; Linda Casserly; Christie Maurer; Suzan Korkusuz; Michael Mcguire
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WEEK OF: February 10, 2020

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DETENTION HEARINGS
& Judge Daniels' VIOLATION HEARINGS

Detention Hearings are usually before Judge Daniels – courtroom 12 - unless otherwise specified

WEEK OF: February 10, 2020

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"	"	"	ERIC GILLISH	W-2020-43-1516	YES	
"	"	"	JASON SAMARITANO	W-2020-239-1507	YES	
"	"	"	STEVEN HERACLIO- ARGUELLO	W-2020-243-1507	YES	
"	"	"	KRAIG SORENSON	W-2020-153-1514	YES	
"	"	"		W-2020-149-1514	YES	DETENTION
"	"	"		W-2020-150-1514	YES	DETENTION
"	"	"		W-2020-139-1514	NO	VOM & MOTION TO REVOKE
"	"	"	JOSEPH WITTY, JR.	W-2020-13-1520	YES	
"	"	"	SHANEECA DECARVALHO	W-2020-42-1505	YES	
				W-2020-219-1507	YES	
				W-2020-220-1507	YES	
				W-2020-132-1514	YES	
				W-2020-218-1507	YES	
				W-2020-44-1505	YES	

WEEK OF: February 10, 2020

MON	2/10	9:00 AM	JENNIFER OLAH	W-2019-479-1506	NO	JUDGE DANIELS – CT. 12 VOM & MOTION TO REVOKE
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"	"	"	RICHARD SANDERS	W-2019-400-1514	YES	
"	"	"	STEVEN SEARLES	W-2020-20-1532 W-2019-432-1516	YES NO	DETENTION VOM & MOTION TO REVOKE
"	"	"	JOHN PANAGAKOS	W-2020-39-1512 W-2019-307-1512 W-2019-188-1512 W-2018-309-1512	YES NO NO NO	DETENTION MOTION TO REVOKE MOTION TO REVOKE MOTION TO REVOKE
"	"	"	KENNETH JAMISON	W-2020-252-1507	YES	
"	"	"	FRANK STOCHER	W-2019-550-1518 W-2019-484-1518	NO NO	VOM & MOTION TO REVOKE VOM & MOTION TO REVOKE
WED	2/12	9:30 AM	RAYMOND MANGLE	W-2020-60-1533	YES	JUDGE DANIELS – CT. 12
"	"	"	MASHON WILSON	W-2020-160-1514 W-2020-162-1514 W-2020-163-1514 W-2020-164-1514 W-2019-224-1514	YES YES YES YES NO	DETENTION DETENTION DETENTION DETENTION VOM & MOTION TO REVOKE
"	"	"	NICHOLAS DOBIAS	W-2020-46-1516 W-2019-169-1532	YES NO	DETENTION MOTION TO REVOKE
"	"	"	ANTHONY TRINIDAD	W-2020-22-1530	YES	ATLANTIC WRIT; ATTY: C. CIAK
"	"	"	TYLER MYLES	W-2020-48-1505 W-2019-500-1505	YES NO	DETENTION MOTION TO REVOKE; ATTY: A. KENNEY

WEEK OF: February 10, 2020

WED	2/12	9:30 AM	CORY RICHARD	W-2020-55-1526	YES	JUDGE DANIELS – CT. 12
"	"	"	IVAN RIVERA	W-2020-103-1514	YES	SPANISH INT.
"	"	"	ZAKIYA THOMAS	W-2020-41-1512	YES	
"	"	"	SHARON SCEA	W-2020-262-1507	YES	
"	"	"	ROBERT COHAN	W-2020-103-1506 W-2020-104-1506	NO NO	MONMOUTH WRIT; Adj. from 2/6
WED	2/12	1:30 PM	ALAN CAMISA	W-2020-254-1507	YES	JUDGE DANIELS – CT. 12
"	"	"	TYLER DIETLMEIER	W-2020-207-1507 W-2020-256-1507	YES YES	
"	"	"	SHANECA DECARVALHO	W-2020-42-1505 W-2020-219-1507 W-2020-220-1507 W-2020-132-1514 W-2020-218-1507 W-2020-44-1505	NO NO NO NO NO NO	Adj. from 2/10
"	"	"	ANTHONY CIPOLLETTI	W-2019-1250-1507	NO	VOM & MTR; ATTY: S. WILLIS
"	"	"	DAVID GIORDANO	W-2019-1948-1507	NO	VOM & MOTION TO REVOKE
THURS	2/13	9:00 AM	SANDY ESPINOSA	W-2020-261-1507	YES	JUDGE DANIELS – CT. 12
"	"	"	PETER SCHNABEL	W-2020-175-1514	YES	
"	"	"	DAYNA ROD	W-2020-266-1507	YES	
"	"	"	MIGUEL VARGAS	W-2020-170-1514	YES	SPANISH INT.
"	"	"	AMIRAN DADESHKELIANI	W-2020-3-1531	YES	GEORGIAN INT.
"	"	"	NORBERTO GONZALEZ	W-2020-176-1514	YES	SPANISH INT.

WEEK OF: February 10, 2020

THURS	2/13	9:00 AM	WAYNE PRICE	W-2020-57-1526	YES	JUDGE DANIELS – CT. 12
"	"	"	BRENDAN WASON	W-2020-51-1505	YES	
"	"	"	DOUGLAS DUNN	W-2017-1384-1514	NO	MOTION TO REVOKE
THURS	2/13	9:00 AM	CHARDEL HOLMAN			JUDGE RYAN – CT. 7
"	"	"	MICHAEL CUIFFREDA	W-2018-829-1507	NO	VOM & MOTION TO REVOKE
"	"	"	URBINA FELIX	W-2020-22-1532	NO	Adj. from 2/11
"	"	"	JOHN PANAGAKOS	W-2020-172-1514	YES	
"	"	"		W-2020-39-1512	NO	DETENTION; Adj. from 2/11
"	"	"		W-2019-307-1512	NO	VOM & MOTION TO REVOKE
"	"	"		W-2019-188-1512	NO	VOM & MOTION TO REVOKE
"	"	"		W-2018-309-1512	NO	VOM & MOTION TO REVOKE
"	"	"	KENNETH JAMISON	W-2020-252-1507	NO	Adj. from 2/11
"	"	"	THOMAS FOX	W-2020-267-1507	YES	
"	"	"	BRIA KROHN	W-2020-56-1526	YES	DETENTION
"	"	"		W-2019-45-1513	NO	MOTION TO REVOKE
"	"	"		W-2019-540-1511	NO	MOTION TO REVOKE
THURS	2/13	3:00 PM	IMARI GUE	W-2019-597-1514	NO	JUDGE DANIELS – CT. 12
FRI	2/14	9:00 AM	JOHN COWAN	W-2020-268-1507	YES	MODIFY CONDITIONS
"	"	"	ANTHONY DILEO	W-2020-62-1533	YES	JUDGE DANIELS – CT. 12
"	"	"		W-2019-449-1505	NO	DETENTION
"	"	"	JOSE ROMERO	W-2020-177-1514	YES	MOTION TO REVOKE
"	"	"	MICHAEL GACHINEIRO	W-2020-118-1506	YES	SPANISH INT.
"	"	"	RICHARD HONE	W-2020-116-1506	YES	TRANSFERRED TO BURLINGTON

WEEK OF: February 10, 2020

FRI	2/14	9:00 AM	DANIEL KESTER	W-2020-35-1524	YES	JUDGE DANIELS – CT. 12
"	"	"	NICHOLAS DOBIAS	W-2020-46-1516	NO	DETENTION; Adj. from 2/12
				W-2019-169-1532	NO	MOTION TO REVOKE
"	"	"	NORBERTO GONZALEZ	W-2020-176-1514	NO	Adj. from 2/13; SPANISH INT.
"	"	"	DOUGLAS DUNN	W-2017-1384-1514	NO	MOTION TO REVOKE; Adj. from 2/13
FRI	2/14	11:00 AM	PAUL ARATA			VIOLATIONS OF MONITORING
				W-2019-2052-1507	NO	VOM & MOTION TO REVOKE
"	"	"	ANTONIO BEERMAN	W-2019-101-1529	NO	
"	"	"	ROBERT CAMP	W-2019-260-1505	NO	Adj. from 2/7
"	"	"	MICHAEL DELIA	W-2019-53-1520	NO	VOM & MOTION TO REVOKE
"	"	"	JUSTIN LONGSTREET	W-2019-1182-1506	NO	
FRI	2/14	1:30 PM	JOHN DILCHER	W-2020-115-1506	YES	JUDGE GIZINSKI – CT. 11
				W-2019-710-1506	NO	DETENTION MOTION TO REVOKE

WEEK OF: February 17, 2020

DA4/18/2024 1:20 PM

DETENTION HEARINGS
& Judge Daniels' VIOLATION HEARINGS

Detention Hearings are usually before Judge Daniels – courtroom 12 - unless otherwise specified

WEEK OF: February 17, 2020

DAY	DATE	TIME	DEFENDANT	COMPLAINT #(s)	FIRST APP. NEEDED	NOTES and / or OTHER JUDGE
MON	2/17	NONE				PRESIDENTS' DAY – COURTS CLOSED
"	"	"				
TUES	2/18	9:00 AM	CAREY MAYO	W-2020-52-1505	YES	JUDGE DANIELS – CT. 12
"	"	"	PATRICK WILLIAMS	W-2020-11-1529	YES	
"	"	"	QUENTIN HUNT	W-2020-163-1507	YES	ESSEX WRIT
"	"	"	OMAR ALFORD	W-2020-61-1526	YES	DETENTION
				W-2020-40-1526	NO	MOTION TO REVOKE
"	"	"	TYLER DIETLMEIER	W-2020-207-1507	NO	Adj. from 2/12
				W-2020-256-1507	NO	
"	"	"	JEROME HARRIS	W-2018-814-1514	NO	MOTION TO REVOKE
				W-2018-526-1514	NO	MOTION TO REVOKE
"	"	"	PETER SCHNABEL	W-2020-175-1514	NO	Adj. from 2/13
"	"	"	BRENDAN WASON	W-2020-51-1505	NO	Adj. from 2/13

WEEK OF: February 17, 2020

WED	2/19	9:00 AM	JOSEPH MAGGELET	W-2020-50-1533	YES	JUDGE RYAN – CT. 7
"	"	"	JASON IRONS	W-2020-64-1533	YES	DETENTION VOM & MOTION TO REVOKE
"	"	"	KENNETH JAMISON	W-2019-453-1533	NO	
"	"	"		W-2020-279-1507	YES	Ad. From 2/13
"	"	"	DUSTIN HICKMAN	W-2020-252-1507	NO	
"	"	"		W-2020-280-1507	YES	
"	"	"	STEVEN GILK	W-2020-74-1518	YES	
THURS	2/20	9:00 AM				JUDGE DANIELS – CT. 12
"	"	"				
"	"	"				
"	"	"				
"	"	"				
"	"	"				
FRI	2/21	9:00 AM				JUDGE DANIELS – CT. 12
"	"	"				
"	"	"				
"	"	"				
"	"	"				
"	"	"				
FRI	2/21	11:00 AM				VIOLATIONS OF MONITORING
"	"	"				
"	"	"				

WEEK OF: February 17, 2020

"	"	"						
---	---	---	--	--	--	--	--	--

Khajezadeh, Dina

From: Jennifer Gottschalk <jgottschalkesq@gmail.com>
Sent: Wednesday, April 8, 2020 6:00 AM
To: Toscano, Taylor
Subject: State v. Richard Hone
Attachments: Hone Screenshot_.pdf

Hi, Ms. Toscano,

As you know, I am now representing Richard Hone. I have just uploaded a screenshot that my client has sent me from Ms. [REDACTED] on April 3, the day after the TRO was dismissed against him in Superior Court, Family Part, Monmouth County.

I have attached it with this email.

I would like to discuss this morning's motion, and wondered if you could call me sometime before 9 a.m.?

My cell is [REDACTED].

Thanks,

Jennifer Gottschalk

--

JENNIFER L. GOTTSCHALK, ESQUIRE

1920 Fairfax Avenue

Cherry Hill, New Jersey 08003

NJ Bar ID 003391980

phone-[REDACTED]

fax-(856)295-8939

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View Message

Fro



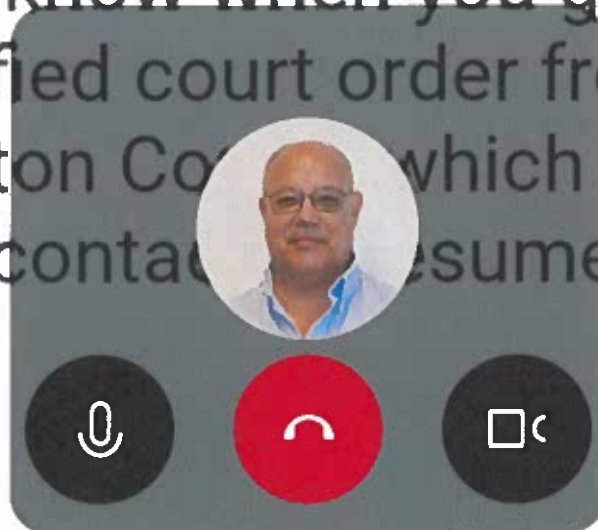
T Richard Hone

[Details](#)

Skype

Apr 03, 2020 at 09:13 AM

Let me know when you get
a modified court order from
Burlington Co. which
allows contact to resume.



Khajezadeh, Dina

From: Annemarie Midiri <Annemarie.Midiri@njcourts.gov>
Sent: Tuesday, April 7, 2020 2:36 PM
To: acesaretti@co.burlington.nj.us; acongdon@co.burlington.nj.us; Audrey Barto; balmeida@co.burlington.nj.us; bcdcid@co.burlington.nj.us; Brooke Harley; BUR PTS; BurPros Group PTS; Connie Nelson; Constance Tobin; cpalmer@co.burlington.nj.us; ddrummond@co.burlington.nj.us; ddwyer@co.burlington.nj.us; Deal, Bethany; dgriffin@co.burlington.nj.us; dpiscotta@co.burlington.nj.us; dpotts@co.burlington.nj.us; DRodriguez@co.burlington.nj.us; ebetancourt@co.burlington.nj.us; gdonovan@co.burlington.nj.us; jaharris@co.burlington.nj.us; Janice Kennedy; jbrewley@co.burlington.nj.us; Jennifer Mendel; Jennifer Rupp; jhall@co.burlington.nj.us; joneill@co.burlington.nj.us; jremy@co.burlington.nj.us; JZell@co.burlington.nj.us; Karen Figueroa; Karen Thek; Kathi Simpson; kgeiger@co.burlington.nj.us; kwindstein@co.burlington.nj.us; lbolden@co.burlington.nj.us; ldowns@co.burlington.nj.us; Lisa Davis; Marie Wardwell; Mark Baldwin; Mark Tarantino; mgrobel@co.burlington.nj.us; mjenkins@co.burlington.nj.us; mlassiter@co.burlington.nj.us; mloures@co.burlington.nj.us; momara@co.burlington.nj.us; Monica Mccoy; Monica Warner; mpretti@co.burlington.nj.us; Nicholas Muehleisen; ntazewell@co.burlington.nj.us; opd.burlington@opd.nj.gov; rdiaz@co.burlington.nj.us; Rebecca Santos; Robin Williams; rwilliams@co.burlington.nj.us; 'sbaldwin@co.burlington.nj.us'; sgericke@co.burlington.nj.us; Shannon Denise; Shelly Chambers; ssingal@co.burlington.nj.us; Stephanie Milliner; Syre White; Tammoy Williams; Tanya Yost; truffin@co.burlington.nj.us
Cc: Jennifer Gottschalk; Toscano, Taylor; David Glassman
Subject: RE: Amended Detention hearings for 4/8/20
Attachments: 4.8.20 detentions.docx

Please see attached amended list with an additional case for Edmondo DiPaolo W-20-093-0334.
Thank you.

Anne Marie Midiri
Court Services Supervisor 2 – Pretrial Services Unit
Criminal Division – Burlington Vicinage
(609) 288-9500 Ext. 38214
annemarie.midiri@njcourts.gov

From: Annemarie Midiri <Annemarie.Midiri@njcourts.gov>
Sent: Tuesday, April 7, 2020 2:23 PM
To: acesaretti@co.burlington.nj.us; acongdon@co.burlington.nj.us; Audrey Barto <audrey.barto@njcourts.gov>; balmeida@co.burlington.nj.us; bcdcid@co.burlington.nj.us; Brooke Harley <brooke.harley@njcourts.gov>; BUR PTS <BURPTS-dl@njcourts.gov>; BurPros Group PTS (ecourtsnotice@co.burlington.nj.us) <ecourtsnotice@co.burlington.nj.us>; Connie Nelson <Connie.Nelson@njcourts.gov>; Constance Tobin <constance.tobin@njcourts.gov>; cpalmer@co.burlington.nj.us; ddrummond@co.burlington.nj.us; ddwyer@co.burlington.nj.us; Deal, Bethany <bdeal@co.burlington.nj.us>; dgriffin@co.burlington.nj.us;

dpiscotta@co.burlington.nj.us; dpotts@co.burlington.nj.us; DRodriguez@co.burlington.nj.us;
ebetancourt@co.burlington.nj.us; gdonovan@co.burlington.nj.us; jaharris@co.burlington.nj.us; Janice Kennedy
<janice.kennedy@njcourts.gov>; jbrewley@co.burlington.nj.us; Jennifer Mendel <Jennifer.Mendel@njcourts.gov>;
Jennifer Rupp <Jennifer.Rupp@njcourts.gov>; jhall@co.burlington.nj.us; joneill@co.burlington.nj.us;
jremy@co.burlington.nj.us; JZell@co.burlington.nj.us; Karen Figueroa <Karen.Figueroa@njcourts.gov>; Karen Thek
<Karen.Thek@opd.state.nj.us>; Kathi Simpson <Kathi.Simpson@njcourts.gov>; kgeiger@co.burlington.nj.us;
kwindstein@co.burlington.nj.us; lbolden@co.burlington.nj.us; ldowns@co.burlington.nj.us; Lisa Davis
<lisa.davis@njcourts.gov>; Marie Wardwell <marie.wardwell@njcourts.gov>; Mark Baldwin
<mark.baldwin@njcourts.gov>; Mark Tarantino <mark.tarantino@njcourts.gov>; mgrobel@co.burlington.nj.us;
mjenkins@co.burlington.nj.us; mlassiter@co.burlington.nj.us; mloures@co.burlington.nj.us;
momara@co.burlington.nj.us; Monica McCoy (mmccoy@co.burlington.nj.us) <mmccoy@co.burlington.nj.us>; Monica
Warner <monica.warner@njcourts.gov>; mpretti@co.burlington.nj.us; Nicholas Muehleisen
<nicholas.muehleisen@njcourts.gov>; ntazewell@co.burlington.nj.us (ntazewell@co.burlington.nj.us)
<ntazewell@co.burlington.nj.us>; opd.burlington@opd.nj.gov; rdiaz@co.burlington.nj.us; Rebecca Santos
<rebecca.santos@njcourts.gov>; Robin Williams <Robin.Williams1@njcourts.gov>; rwilliams@co.burlington.nj.us;
'sbaldwin@co.burlington.nj.us' <sbaldwin@co.burlington.nj.us>; sgericke@co.burlington.nj.us; Shannon Denise
<Shannon.Denise@njcourts.gov>; Shelly Chambers <shelly.chambers@njcourts.gov>; ssingal@co.burlington.nj.us;
Stephanie Milliner <stephanie.milliner@njcourts.gov>; Syre White <syre.white@njcourts.gov>; Tammoy Williams
<tammoy.williams@njcourts.gov>; Tanya Yost <Tanya.Yost@njcourts.gov>; truffin@co.burlington.nj.us
Cc: Jennifer Gottschalk <jgottschalkesq@gmail.com>; TToscano@co.ocean.nj.us; David Glassman
<davidjayglassman@gmail.com>

Subject: Detention hearings for 4/8/20

Good Afternoon,

Please see the attached Detention Hearing List for Wednesday, April 8, 2020 at 9am before Judge Tarantino. Thank you.

Anne Marie Midiri

Court Services Supervisor 2 – Pretrial Services Unit

Criminal Division – Burlington Vicinage

(609) 288-9500 Ext. 38214

annemarie.midiri@njcourts.gov

Adult Detention Hearings

Criminal Division

Wednesday, April 8, 2020

Judge Tarantino 9:00 am

All Matters will be completed via Video

The following defendants (3 total) Needs a First Appearances Completed

M Ronnie White W-2020-165-0317

M James Carfora W-2020-198-0306

M Edmondo DiPaola W-2020-093-0334

Detention Hearings (First Appearance Completed)

M Edmondo Dipaolo W-20-091-0334 (private atty. David Glassman) (pp. by state from 3/25 list, pp. by state from 3/27 list, pp. by defense from 3/31 list, pp. by court from 4/7 due to new charges)

Motion to Modify Pretrial Conditions

M Richard Hone 20-607 (DA Gottshalk/AP Taylor Toscano-Ocean County Prosecutor's Office)

Invite should go to Mr. Hone at [REDACTED]

Khajezadeh, Dina

From: Annemarie Midiri <Annemarie.Midiri@njcourts.gov>
Sent: Tuesday, April 7, 2020 2:23 PM
To: acesaretti@co.burlington.nj.us; acongdon@co.burlington.nj.us; Audrey Barto; balmeida@co.burlington.nj.us; bcdcid@co.burlington.nj.us; Brooke Harley; BUR PTS; BurPros Group PTS; Connie Nelson; Constance Tobin; cpalmer@co.burlington.nj.us; ddrummond@co.burlington.nj.us; ddwyer@co.burlington.nj.us; Deal, Bethany; dgriffin@co.burlington.nj.us; dpiscotta@co.burlington.nj.us; dpotts@co.burlington.nj.us; DRodriguez@co.burlington.nj.us; ebetancourt@co.burlington.nj.us; gdonovan@co.burlington.nj.us; jaharris@co.burlington.nj.us; Janice Kennedy; jbrewley@co.burlington.nj.us; Jennifer Mendel; Jennifer Rupp; jhall@co.burlington.nj.us; joneill@co.burlington.nj.us; jremy@co.burlington.nj.us; JZell@co.burlington.nj.us; Karen Figueroa; Karen Thek; Kathi Simpson; kgeiger@co.burlington.nj.us; kwindstein@co.burlington.nj.us; lbolden@co.burlington.nj.us; ldowns@co.burlington.nj.us; Lisa Davis; Marie Wardwell; Mark Baldwin; Mark Tarantino; mgrobel@co.burlington.nj.us; mjenkins@co.burlington.nj.us; mlassiter@co.burlington.nj.us; mloures@co.burlington.nj.us; momara@co.burlington.nj.us; Monica Mccoy; Monica Warner; mpretti@co.burlington.nj.us; Nicholas Muehleisen; ntazewell@co.burlington.nj.us; opd.burlington@opd.nj.gov; rdiaz@co.burlington.nj.us; Rebecca Santos; Robin Williams; rwilliams@co.burlington.nj.us; 'sbaldwin@co.burlington.nj.us'; sgericke@co.burlington.nj.us; Shannon Denise; Shelly Chambers; ssingal@co.burlington.nj.us; Stephanie Milliner; Syre White; Tammoy Williams; Tanya Yost; truffin@co.burlington.nj.us
Cc: Jennifer Gottschalk; Toscano, Taylor; David Glassman
Subject: Detention hearings for 4/8/20
Attachments: 4.8.20 detentions.docx

Good Afternoon,

Please see the attached Detention Hearing List for Wednesday, April 8, 2020 at 9am before Judge Tarantino. Thank you.

Anne Marie Midiri

Court Services Supervisor 2 – Pretrial Services Unit

Criminal Division – Burlington Vicinage

(609) 288-9500 Ext. 38214

annemarie.midiri@njcourts.gov

Adult Detention Hearings

Criminal Division

Wednesday, April 8, 2020

Judge Tarantino 9:00 am

All Matters will be completed via Video

The following defendants (2 total) Needs a First Appearances Completed

M Ronnie White W-2020-165-0317

M James Carfora W-2020-198-0306

Detention Hearings (First Appearance Completed)

M Edmondo Dipaolo W-20-091-0334 (private atty. David Glassman) (pp. by state from 3/25 list, pp. by state from 3/27 list, pp. by defense from 3/31 list, pp. by court from 4/7 due to new charges)

Motion to Modify Pretrial Conditions

M Richard Hone 20-607 (DA Gottshalk/AP Taylor Toscano-Ocean County Prosecutor's Office)

Invite should go to Mr. Hone at [REDACTED]

Khajezadeh, Dina

From: Janice Kennedy <janice.kennedy@njcourts.gov>
Sent: Tuesday, April 7, 2020 1:18 PM
To: Jennifer Gottschalk; Toscano, Taylor
Subject: RE: [External]RE: Richard Hone

Hi Jennifer:

Yes, I printed them from ECourts.

Thank you,

*Janice Y. Kennedy
Secretary to the Hon. Mark P. Tarantino, J.S.C.
Superior Court of New Jersey
Burlington Vicinage-Criminal Division
49 Rancocas Road
Mount Holly, NJ 08060
609-288-9500, x38806
Fax 609-826-7072*

From: Jennifer Gottschalk <jgottschalkesq@gmail.com>
Sent: Tuesday, April 7, 2020 1:16 PM
To: Janice Kennedy <janice.kennedy@njcourts.gov>; TToscano@co.ocean.nj.us
Subject: Re: [External]RE: Richard Hone

Hi, Janice,
Attached are the filings previously submitted by Karen Thek, Esq., of the Public Defender's office.
Regards,
Jennifer Gottschalk

On Tue, Apr 7, 2020 at 12:31 PM Janice Kennedy <janice.kennedy@njcourts.gov> wrote:

Thank you. Printed for the Judge for tomorrow.

Jennifer, please forward your motion, certification, etc.

Thank you,

Janice Y. Kennedy

Secretary to the Hon. Mark P. Tarantino, J.S.C.

Superior Court of New Jersey

Burlington Vicinage-Criminal Division

49 Rancocas Road

Mount Holly, NJ 08060

609-288-9500, x38806

Fax 609-826-7072

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

Sent: Tuesday, April 7, 2020 12:04 PM

To: Michelle Consuegra <Michelle.Consuegra@njcourts.gov>

Cc: Jennifer Gottschalk <jgottschalkesq@gmail.com>; Janice Kennedy <janice.kennedy@njcourts.gov>; Annemarie Midiri <Annemarie.Midiri@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>

Subject: RE: [External]RE: Richard Hone

Good afternoon,

Please find my response letter brief and accompanying exhibits for the above case schedule for tomorrow. I also filed them on eCourts. Thank you!



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: Michelle Consuegra <Michelle.Consuegra@njcourts.gov>
Sent: Tuesday, April 7, 2020 10:14 AM
To: Toscano, Taylor <TToscano@co.ocean.nj.us>
Cc: Jennifer Gottschalk <jgottschalkesq@gmail.com>; Janice Kennedy <janice.kennedy@njcourts.gov>; Annemarie Midiri <Annemarie.Midiri@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>
Subject: FW: [External]RE: Richard Hone

Good Morning-

The matter will be heard tomorrow before Judge Tarantino, please send all information to Janice Kennedy who is included on this emails.

Thank you

Michelle Consuegra

Assistant Division Manager, Pretrial Services

Criminal Division

49 Rancocas Road, 1st Floor

Mount Holly, NJ

609-288-9500 ext. 38211

From: Shannon Denise <Shannon.Denise@njcourts.gov>
Sent: Tuesday, April 7, 2020 10:11 AM
To: Michelle Consuegra <Michelle.Consuegra@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>; Annemarie Midiri <Annemarie.Midiri@njcourts.gov>
Subject: FW: [External]RE: Richard Hone

Hi:

Can you please respond to him?

thanks

Shannon DeNise

Criminal Division Manager

Burlington Vicinage

(609)288-9500 x 38125

Shannon.denise@njcourts.gov

From: Toscano, Taylor <TToscano@co.ocean.nj.us>
Sent: Tuesday, April 7, 2020 9:45 AM
To: Shannon Denise <Shannon.Denise@njcourts.gov>
Subject: RE: [External]RE: Richard Hone

Good morning!

Can you advise which Judge this will be in front of and an email for the secretary/law clerk that I can send a brief letter to? Thank you!

Taylor Toscano

Ocean County Prosecutor's Office



From: Shannon Denise <Shannon.Denise@njcourts.gov>
Sent: Monday, April 6, 2020 1:46 PM
To: Toscano, Taylor <TToscano@co.ocean.nj.us>
Cc: jgottschalkesq@gmail.com
Subject: RE: [External]RE: Richard Hone

Good Afternoon:
My PreTrial staff will be in touch with you about the scheduling of this hearing.

Shannon

Shannon DeNise

Criminal Division Manager

Burlington Vicinage

(609)288-9500 x 38125

Shannon.denise@njcourts.gov

From: Toscano, Taylor <TToscano@co.ocean.nj.us>
Sent: Monday, April 6, 2020 1:40 PM
To: Shannon Denise <Shannon.Denise@njcourts.gov>
Cc: jgottschalkesq@gmail.com
Subject: [External]RE: Richard Hone

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.

Good afternoon,

I am in receipt of your motion to modify the defendant's pretrial conditions. As previously stated, our office is not consenting to modifying the no contact order. It is my understanding that there is a permanent restraining order out of Monmouth County prohibiting the defendant from contacting the victim. Even if a judge were to modify his release conditions, that order would control. Any contact the defendant wishes to have with the child/children can be address in the family court under a FD docket or with DCPD. I've attached it for your review. Please let me know if I am mistaken.

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: Bryce , Hillary <HBryce@co.ocean.nj.us>
Sent: Monday, April 6, 2020 1:32 PM
To: Shannon Denise <Shannon.Denise@njcourts.gov>; Toscano, Taylor <TToscano@co.ocean.nj.us>
Cc: jgottschalkesq@gmail.com; Miljenovic , Patricia <PMiljenovic@co.ocean.nj.us>; Armstrong , Robert <RArmstrong@co.ocean.nj.us>
Subject: RE: Richard Hone

AP Taylor Toscano will be handling this matter. I have put her on this email. Please send her any other information about the case.

Thank you



Hillary Bryce
Chief Grand Jury & Intake Attorney
119 Hooper Avenue P.O. Box 2191
Toms River, NJ 08754-2191
Phone: (732) 929-2027 Ext. 2144
Email: hbryce@co.ocean.nj.us

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FOR OFFICIAL USE ONLY - LAW ENFORCEMENT SENSITIVE

----- Original message -----

From: "Armstrong , Robert" <RArmstrong@co.ocean.nj.us>

Date: 4/6/20 11:25 AM (GMT-05:00)

To: Karen Thek <Karen.Thek@opd.nj.gov>, Shannon Denise <Shannon.Denise@njcourts.gov>

Cc: jgottschalkesq@gmail.com, "Bryce , Hillary" <HBryce@co.ocean.nj.us>

Subject: Re: Richard Hone

Good morning,

The State does not consent to the relief sought by the defendant. Please contact AP Hillary Bryce regarding this matter.

Thank you,

Bob Armstrong

Ocean County Prosecutor's Office

From: Karen Thek <Karen.Thek@opd.nj.gov>

Sent: Monday, April 6, 2020 11:17 AM

To: Shannon Denise

Cc: Armstrong , Robert; jgottschalkesq@gmail.com

Subject: FW: Richard Hone

Hello all,

Jennifer Gottshalk now represents Mr. Hone. (copied on this email). I am copying Mr. Armstrong because we have not heard who the attorney is and we were hoping this could be addressed today. If it is a consent – there is no need for anyone to be present – it can just be placed on the record.

KT

From: Karen Thek
Sent: Friday, April 3, 2020 2:15 PM
To: Shannon Denise <Shannon.Denise@njcourts.gov>
Subject: FW: Richard Hone

This is the response I got from Mr. Armstrong. Apparently – he is NOT the AP who will be handling this.

From: Armstrong , Robert [<mailto:RArmstrong@co.ocean.nj.us>]
Sent: Friday, April 3, 2020 2:13 PM
To: Bryce , Hillary <HBryce@co.ocean.nj.us>
Cc: Karen Thek <Karen.Thek@opd.nj.gov>
Subject: [EXTERNAL] Fw: Richard Hone

Hi Hillary,

I am forwarding this email for your handling. I do not know if a specific AP has been assigned yet to handle this matter (venue was transferred to Burlington County).

Thank you,

Bob

From: Karen Thek <Karen.Thek@opd.nj.gov>
Sent: Friday, April 3, 2020 1:59 PM

To: Armstrong , Robert
Subject: Richard Hone

Hello there.

I just filed a Motion to Modify Conditions of Pretrial Release in the above-referenced mater. Please see attached. Would you be able to tell me if you consent? We are trying to schedule this. I have a Burlington AP on the paperwork because that is the person who handled the detention hearing, but I just learned that you will be handling the case moving forward.

I hope you are doing well otherwise & I look forward to talking with you.

KT

Karen R. Thek
Assistant Deputy Public Defender
NJ Office of the Public Defender
100 High Street – 2nd Floor
Mount Holly, NJ 08060
(p) 609-518-3060
(f) 609-518-3072

--
JENNIFER L. GOTTSCHALK, ESQUIRE
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003
NJ Bar ID 003391980
phone-[REDACTED]
fax-(856)295-8939

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PLEASE TAKE FURTHER NOTICE that in support of this application, the undersigned shall rely on the certification filed with the Court on behalf of defendant.

OFFICE OF THE PUBLIC DEFENDER

By: /s/ Karen R. Thek
Karen R. Thek
Assistant Deputy Public Defender

cc: Richard Hone

STATE OF NEW JERSEY
Pltf.

SUPERIOR COURT OF NEW JERSEY
CRIMINAL DIVISION
BURLINGTON COUNTY
Docket No. BUR-2200-607

v.

Criminal Action

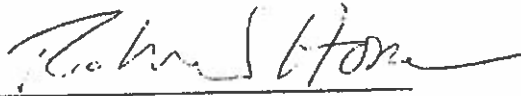
**Notice Request to Amend Order
For Pre-Trial Release and to adhere to
Monmouth Family Ct. Order FV-923-20
IMMEDIATE AMENDMENT REQUEST**

RICHARD HONE
Def. Pro-Se

Please accept this notice brief in lieu of a more formal filing for the above relief and for the following reasons;

1. Judge Dalton, JSC, Monmouth Family Court has DENIED a request for a final restraining order by [REDACTED] today, April 2, 2020, Docket # FV-923-20, and has reinstated all my prior rights for my 5-year-old daughter [REDACTED] (Attached is a copy of the Order), including Skype visits.
2. Please amend the Burlington Order of February 21, 2020 by Judge Tarantino, JSC to reflect the Monmouth County Family Court Order.
3. Any other relief the court deems fit.

I swear the above statements made by me are true. If any of the above statements made by me are willfully false, I am subject to punishment.


Richard Hone, Pro-Se

4/2/20
Date:

OFFICE OF THE PUBLIC DEFENDER
THE WASHINGTON HOUSE
100 HIGH STREET, SECOND FLOOR
MOUNT HOLLY, N.J. 08060
(609) 518-3060

STATE OF NEW JERSEY

Plaintiff,

v.

RICHARD HONE,

Defendant

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY
LAW DIVISION -- CRIMINAL ACTION

SYSTEM NO. 20-607

CERTIFICATION OF COUNSEL

KAREN THEK certifies as follows:

1. I am an attorney-at-law of the State of New Jersey and employed by the Office of the Public Defender in the Burlington Region. I have been assigned to represent defendant, Richard Hone, in the matter captioned above.

2. I make this certification in support of defendant's application to modify the conditions of Pre-Trial release under System No. 20-607.

3. Defendant was placed on PML III on 2/21/20 with a no contact provision with the named victim and defendant's child.

4. Defendant was told that if there was a material change in the family court case, the court would revisit the no contact provisions.

5. On 4/2/20, the named victim's application for a Final Restraining Order was denied by Judge Angela W. Dalton, J.S.C. who found insufficient evidence to sustain any allegation of domestic violence. (see attached Order of Dismissal and Pro Se Notice of Motion).

6. Defendant is seeking a modification in the conditions of Pre-Trial release eliminating the

no contact provision. All other conditions of Pre-Trial release would remain in full force and effect.

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

/s/ Karen Thek
Karen Thek (0202202004)

Dated: April 3, 2020

BRADLEY D. BILLHIMER
Ocean County Prosecutor

VINCENT A. PETRECCA
Chief of Detectives



MICHAEL T. NOLAN JR.
First Assistant Prosecutor

ROBERT J. ARMSTRONG
Deputy First Assistant Prosecutor

OFFICE OF THE PROSECUTOR
Courthouse Annex Building
119 Hooper Avenue
P.O. Box 2191
Toms River, New Jersey 08754-2191
732-929-2027

The Honorable Mark T. Tarantino, J.S.C.
Via email to Janice Kennedy

RE: State v. Richard Hone (20000607)

Judge Tarantino,

The State is in receipt of defense counsel's motion to modify the above defendant's pretrial release conditions. By way of background, this defendant was charged on February 10, 2020 with Contempt, specifically violating a permanent restraining order, under 2C:29-9a and Harassment under 2C:33-4a. The defendant was placed on level III pretrial monitoring on February 21, 2020, which included a no contact provision with the victim (See attached S-1). Defense counsel is now requesting that Your Honor eliminate that provision.

A Superior Court Judge may review the conditions of pretrial release set pursuant to R. 3:26-1 on its own motion, or upon motion by the prosecutor or the defendant alleging that there has been a material change in circumstance that justifies a change in conditions. R. 3:26-2c(2). While the State concedes that a Final Restraining Order filed by the victim was denied on April 4, 2020, there is an active Permanent Restraining Order out of Monmouth County dated August 4, 2017 under Docket no. 16000548. (See attached S-2)

Even if Your Honor were to remove the no contact provision from the Pretrial Release Order, the defendant is still prohibited from contacting the victim under the Permanent Restraining Order in Monmouth County. Any issue the defendant wishes to address regarding parenting time should be address by way of motion in the Family Division under a non-dissolution docket.

Additionally, the State would argue that this defendant continues to disobey Court Orders by contacting the victim regardless of whether there is an Order in place. Not only was the defendant aware of the Permanent Restraining Order, he almost instantly violated that Order upon his release from state prison in December 2019—a sentence he was serving for stalking the present victim, and for violating a Restraining Order involving the same victim. Lastly, the victim vehemently objects to any contact with the defendant. (See attached S-3).

For the aforementioned arguments, the State would respectfully ask that Your Honor deny defendant's request to modify his pretrial release conditions.

Respectfully,

/s/ Taylor E. Toscano
Attorney ID: 153792015

CC: Defense counsel via email

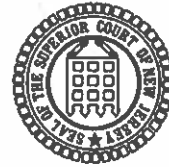
PREPARED BY COURT

State of New Jersey,

v.

Richard W Hone,

Defendant.



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

Complaint #: W-2020-000116-1506

Criminal Action

ORDER DENYING
PRETRIAL DETENTION
AND ORDERING PRETRIAL
RELEASE

FINDINGS:

THIS MATTER having been opened to the court by the State, and the court having conducted a hearing with appearing on behalf of the Ocean Prosecutor, representing the State of New Jersey, and appearing on behalf of the defendant,

The court finds that the State has established probable cause that the eligible defendant committed the charged offense(s) based on:

- The probable cause affidavit
- The preliminary law enforcement incident report
- Other evidence, specifically, s2 & s5

REASONS FOR DENIAL OF PRETRIAL DETENTION:

FURTHER, for the reasons set forth on the record and herein, the court does not find clear and convincing evidence that pretrial detention is necessary to reasonably assure the defendant's appearance in court when required, the protection of the safety of any other person or the community, and that the defendant will



not obstruct or attempt to obstruct the criminal justice process.

AP IS GENNA MOSCATO, DA IS WENDY MORAGNE

1-psa recommends pml2 w/ scores 3/4

2-no pending charges; not on pretrial monitoring; not on probation or parole & 1 fta 2014

3-limited contact has permitted with victim relating to their 5 yr old child

4-all out of state records do not show any convictions, so the court has to assume no convictions outside of nj

THEREFORE, the motion for pretrial detention is **DENIED**.

FINDINGS FOR PRETRIAL RELEASE:

THE COURT FINDS that releasing the defendant on personal recognizance or on an execution of an unsecured appearance bond is insufficient to reasonably assure the defendant's appearance in court when required, the protection of the safety of any other person or the community and that the defendant will not obstruct or attempt to obstruct the criminal justice process, and therefore is **ORDERING THE DEFENDANT RELEASED SUBJECT TO NON-MONETARY CONDITIONS**.

REASONS FOR DEPARTURE FROM PRETRIAL SERVICES RECOMMENDATION:

THE COURT FINDS that a departure from the recommendation is appropriate after considering the following information:

- the defendant has made specific threats of future harm to the victim or a witness



CONDITIONS OF RELEASE

IT IS ORDERED, on this date, February 21, 2020, that the defendant be released on Pretrial Monitoring Level III on the following non-monetary conditions:

The defendant

- shall appear for all scheduled court proceedings.
- shall immediately notify Pretrial Services of any change of address, telephone number or other contact information.
- shall not commit any offense during the period of release.
- shall avoid all contact with an alleged victim of the offense.
- shall abide by specified restrictions on personal association as follows: CHILD [REDACTED] UNDER ANY CIRCUMSTANCES REGARDLESS IF THERE IS ANY RESTRAINING ORDER IN EFFECT
- shall report to Pretrial services as follows: telephonically once every other week and in person once every other week
- shall refrain from possessing a firearm, destructive device, or other dangerous weapon.
- shall satisfy the following other conditions: -OBEY ALL RESTRAINING ORDERS
-OBEY ORDER RESTRAINING DEFT FROM COMMUNICATING WITH OCEAN CO. COURT



NOTICE TO THE DEFENDANT

FURTHER, the following shall serve as NOTICE of additional responsibilities of the defendant while on pretrial release, and the PENALTIES for noncompliance:

- You must notify the court immediately in writing if you are detained in jail or prison or otherwise cannot appear at a court proceeding.
- You must provide Pretrial Services with a valid cellular phone number or email address, to which you have access, to receive reminders for your scheduled court appearances.
- If you fail to appear at a court proceeding and are arrested in another state or jurisdiction, you agree to waive all rights to extradition proceedings under the New Jersey statutes and the demanding state's or jurisdiction's statutes in regard to extradition law.
- Failure to appear, violation of any condition(s) of release or a restraining order or the commission of a new offense shall result in one or more of the following penalties and consequences:
 - Issuance of a warrant for your arrest,
 - Increasingly restrictive conditions,
 - A revocation of your release,
 - Forfeiture of any monetary bail,
 - Possible detention.



NEXT COURT DATE:

You are hereby ORDERED to return to court on 04/08/2020, at 09:00 AM, at BURLINGTON COUNTY-CRIMINAL COURTS,49 RANCOCAS ROAD, MT HOLLY NJ 08060

Comments: PIP

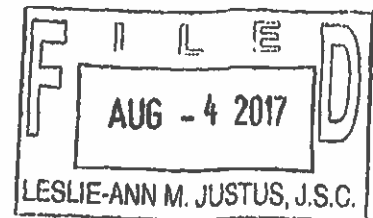
PRETRIAL MONITORING DETAILS:

You are hereby ORDERED to report to Pretrial Services at BURLINGTON CO COURTHOUSE,49 RANCOCAS RD 1ST FLOOR 49 RANCOCAS RD 1ST FLOOR, MOUNT HOLLY NJ 08060. You will receive a notice of your appointment from Pretrial Services.

Date:02/21/2020

/s/ JUDGE JUDGE OUT OF COUNTY TRANSF

JOSEPH D. CORONATO
OCEAN COUNTY PROSECUTOR
OCEAN COUNTY PROSECUTOR'S OFFICE
119 HOOPER AVENUE
TOMS RIVER, NEW JERSEY 08754



SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - (CRIMINAL)
MONMOUTH COUNTY
CASE NO. 16-00-0548
INDICTMENT NO. 16-10-2072

STATE OF NEW JERSEY,	:	PERMANENT RESTRAINING
	:	ORDER FOR STALKING
	:	CONVICTION PURSUANT TO <u>N.J.S.A.</u>
	:	2C:12-10.1
Plaintiff,	:	
V.	:	
RICHARD HONE,	:	
Defendant.	:	

THIS MATTER having been brought before the Court on application of Heidi Tannenbaum-Newman, Assistant Ocean County Prosecutor, on behalf of the State of New Jersey, and Patricia Beardon, Esq. of the Monmouth County Public Defender's Office appearing on behalf of the defendant Richard Hone;

WHEREAS on April 17, 2017, the defendant, Richard Hone, pled guilty to a crime of Stalking, a third degree crime in violation of N.J.S.A. 2C:12-10c, for which he was sentenced and corrected on August 4, 2017;

AND the Court having conducted a hearing on the State's application for a permanent restraining order, and the victim [REDACTED] not having requested otherwise;

IT IS THEREFORE on this 4th day of August, 2017 hereby **ORDERED** that the Defendant, Richard Hone, shall hereafter be permanently subject to a Permanent Restraining Order for said Stalking conviction and be subject to the following conditions pursuant to N.J.S.A. 2C:12-10.1:

1. The defendant Richard Hone is hereby restrained from entering the residence, property, School, or place of employment of the victim [REDACTED], and is hereby required to stay away from the residence and place of employment of [REDACTED].
2. The defendant Richard Hone is hereby restrained from making contact with the victim [REDACTED] whether it be personal contact or contact through an agent, and is restrained from initiating any communication likely to cause annoyance or alarm including, but not limited to, personal, written, or telephone contact, or contact via electronic device, with the victim [REDACTED], her immediately family members, her employers, employees or fellow workers, or others with whom communication would be likely to cause annoyance or alarm to the victim [REDACTED]. *Any and all issues related to the parties' child, [REDACTED] however, shall be controlled by Family Court Docket No. FV-13-01267-17, or by any other duly issued Family Part Order.*
3. "Communication" as proscribed in paragraph 2 herein shall also, pursuant to N.J.S.A. 2C:12-10.1 and N.J.S.A. 2C:1-14q, mean any form of communication made by any means, including, but not limited to, any verbal or written communication; communications conveyed by any electronic communication device, which includes but is not limited to, a wire radio, electromagnetic, photoelectric or photo-optical system; including a cordless, cellular or digital telephone, computer, video recorder, fax machine, pager, or any other

means of transmitting voice or data; and communications made by a sign or gesture.

4. This Permanent Restraining Order shall be in effect throughout the State of New Jersey, and shall be enforced by all law enforcement officers.
5. A violation of this Permanent Restraining Order by the defendant Richard Hone shall constitute an offense under subsection a. of N.J.S.A. 2C:29-9.
Violations of this Order may be enforced in a civil or criminal action initiated by the victim [REDACTED] or by the Court, on its own motion, pursuant to applicable court rules. An enforcement action for violation of this Permanent Restraining Order shall not preclude the filing of a criminal complaint for stalking based on the same act which is the basis for the violation.
6. This Permanent Restraining Order may be dissolved upon the application of the victim [REDACTED] to this Court.

Leslie-Ann Justus

HON. LESLIE-ANN JUSTUS, J.S.C.

In light of the current pending criminal charges, I would like to object to modification of the pre-trial release conditions.

The defendant has used coercion, threats and intimidation in the past criminal case in order to obstruct the justice process & evade prosecution to make me drop charges.

He has never been a part of ~~our~~ daughters life who is now 5 he was only recently granted supervised (by me) Skype visits on Dec. 19, 2019 (prior to these charges). He does not pay child support

and is in arrears almost \$50K.

I believe it is unreasonable to allow visitation which must be supervised by me with someone I have criminal charges against and who continues to deny or minimize or shift blame of any wrongdoing on his part portraying himself as the victim. My daughter is thriving without his contact and visitation should be suspended until final adjudication of these criminal charges. No contact should be allowed with the victim or child pending the outcome of this case.

Thank you,

[REDACTED]

Khajezadeh, Dina

From: eCourts.Mailbox@Judiciary.State.NJ.US
Sent: Tuesday, April 7, 2020 12:02 PM
To: Toscano, Taylor; JGOTTSCHALKESQ@GMAIL.COM;
ECOURTSNOTICE@CO.BURLINGTON.NJ.US
Subject: NJ eCourts Filing Notification - Criminal Case BUR-20-000607 - Hone, Richard

SUPERIOR COURT OF NEW JERSEY - eCOURTS

The following was filed by TAYLOR E TOSCANO on 04/07/2020 at 12:01 PM:

Defendant Name: RICHARD HONE

Case Caption: STATE OF NEW JERSEY VS RICHARD HONE

Case Number: [Criminal BUR-20-000607](#)

Docket Text: Response to Motion - BRIEF - submitted by TAYLOR E TOSCANO of OCEAN COUNTY PROSECUTORS OFFICE on behalf of the State of NJ re: MODIFY PRETRIAL RELEASE CONDITIONS

Transaction ID: [CRM2020311197](#)

Notice has been electronically mailed to:

Prosecuting Attorney	TAYLOR E TOSCANO	TTOSCANO@CO.OCEAN.NJ.US
Defense Attorney for	JENNIFER L GOTTSCHALK RICHARD HONE	JGOTTSCHALKESQ@GMAIL.COM
County Prosecutor	BURLINGTON COUNTY	ECOURTSNOTICE@CO.BURLINGTON.NJ.US

Notice was not electronically mailed to:

Prosecuting Attorney Not assigned in PROMIS/Gavel 49 RANCOCAS ROAD
MT. HOLLY, NJ

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

For questions, please contact the Criminal Division, State of NJ Judiciary, in the county of venue.

This communication is for notification purposes only.

This email was sent from a notification-only address that cannot accept incoming mail. Please do not reply to this message.

Khajezadeh, Dina

From: Jennifer Gottschalk <jgottschalkesq@gmail.com>
Sent: Monday, April 13, 2020 1:58 PM
To: Toscano, Taylor
Subject: State v. Richard Hone

Hi, Ms. Toscano,
I know that you cannot predict what [REDACTED] will say about this latest motion. However, you had represented to both me and the court last Wednesday that you would be guided by what happened in the FD case. Has your position changed since then?

thanks,
Jennifer Gottschalk

--
JENNIFER L. GOTTSCHALK, ESQUIRE
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003
NJ Bar ID 003391980
phone-[REDACTED]
fax-(856)295-8939

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Khajezadeh, Dina

From: Jennifer Gottschalk <jgottschalkesq@gmail.com>
Sent: Monday, April 13, 2020 1:02 PM
To: Toscano, Taylor
Cc: Michelle Consuegra; Annemarie Midiri; Charles Marvin
Subject: Re: [External]State v. Hone, PG 20-607, W-2020-116-1506

yes, however, [REDACTED] participated in the hearing on 4/9/20 and was aware of the court's decision there. I would be surprised if she found this motion to be unexpected.

On Mon, Apr 13, 2020 at 12:58 PM Toscano, Taylor <TToscano@co.ocean.nj.us> wrote:

Thank you for your help. However, 1 day to respond to a motion is insufficient time to prepare. I understand Mr. Hone's anxiousness to have this matter heard, but a week is a more appropriate time frame to properly respond to a motion, especially given the current circumstances.

Please let me know what day the Judge decides. Thank you!

Taylor

From: Jennifer Gottschalk <jgottschalkesq@gmail.com>
Sent: Monday, April 13, 2020 12:23 PM
To: Michelle Consuegra <Michelle.Consuegra@njcourts.gov>
Cc: Toscano, Taylor <TToscano@co.ocean.nj.us>; Annemarie Midiri <Annemarie.Midiri@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>
Subject: Re: [External]State v. Hone, PG 20-607, W-2020-116-1506

Ok, thank you. I appreciate your efforts!

On Mon, Apr 13, 2020 at 12:22 PM Michelle Consuegra <Michelle.Consuegra@njcourts.gov> wrote:

If we cannot come to an agreement on the date I will need to have a Judge address the scheduling if the AP is requesting more time to respond.

Michelle Consuegra

Assistant Division Manager, Pretrial Services

Criminal Division

49 Rancocas Road, 1st Floor

Mount Holly, NJ

609-288-9500 ext. 38211

From: Jennifer Gottschalk <jgottschalkesq@gmail.com>

Sent: Monday, April 13, 2020 11:53 AM

To: Michelle Consuegra <Michelle.Consuegra@njcourts.gov>

Cc: TToscano@co.ocean.nj.us; Janice Kennedy <janice.kennedy@njcourts.gov>; Annemarie Midiri <Annemarie.Midiri@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>

Subject: Re: [External]State v. Hone, PG 20-607, W-2020-116-1506

My client will not consent. He wants it this week. Please. We have the order from Judge Acquaviva.

On Mon, Apr 13, 2020 at 11:33 AM Michelle Consuegra <Michelle.Consuegra@njcourts.gov> wrote:

Sorry 4/21

Michelle Consuegra

Assistant Division Manager, Pretrial Services

Criminal Division

49 Rancocas Road, 1st Floor

Mount Holly, NJ

609-288-9500 ext. 38211

From: Michelle Consuegra

Sent: Monday, April 13, 2020 11:33 AM

To: 'Toscano, Taylor' <TToscano@co.ocean.nj.us>; 'Jennifer Gottschalk' <jgottschalkesq@gmail.com>; Janice Kennedy <janice.kennedy@njcourts.gov>

Cc: Annemarie Midiri <Annemarie.Midiri@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>
Subject: RE: [External]State v. Hone, PG 20-607, W-2020-116-1506

Just to clarify 4/20

Michelle Consuegra

Assistant Division Manager, Pretrial Services

Criminal Division

49 Rancocas Road, 1st Floor

Mount Holly, NJ

609-288-9500 ext. 38211

From: Michelle Consuegra

Sent: Monday, April 13, 2020 11:32 AM

To: Toscano, Taylor <TToscano@co.ocean.nj.us>; Jennifer Gottschalk <jgottschalkesq@gmail.com>;
Janice Kennedy <janice.kennedy@njcourts.gov>

Cc: Annemarie Midiri <Annemarie.Midiri@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>

Subject: RE: [External]State v. Hone, PG 20-607, W-2020-116-1506

OK Tuesday at 9am before Judge Garrenger

Michelle Consuegra

Assistant Division Manager, Pretrial Services

Criminal Division

49 Rancocas Road, 1st Floor

Mount Holly, NJ

609-288-9500 ext. 38211

From: Toscano, Taylor <TToscano@co.ocean.nj.us>
Sent: Monday, April 13, 2020 11:32 AM
To: Michelle Consuegra <Michelle.Consuegra@njcourts.gov>; Jennifer Gottschalk <jgottschalkesq@gmail.com>; Janice Kennedy <janice.kennedy@njcourts.gov>
Cc: Annemarie Midiri <Annemarie.Midiri@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>
Subject: RE: [External]State v. Hone, PG 20-607, W-2020-116-1506

Tuesday would be best. I have a victim advocate reaching out and I'll prepare a response hopefully within a day or so. Thank you!

From: Michelle Consuegra <Michelle.Consuegra@njcourts.gov>
Sent: Monday, April 13, 2020 11:30 AM
To: Toscano, Taylor <TToscano@co.ocean.nj.us>; Jennifer Gottschalk <jgottschalkesq@gmail.com>; Janice Kennedy <janice.kennedy@njcourts.gov>
Cc: Annemarie Midiri <Annemarie.Midiri@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>
Subject: RE: [External]State v. Hone, PG 20-607, W-2020-116-1506

Yes we can do Friday or Tuesday next week?

Michelle Consuegra

Assistant Division Manager, Pretrial Services

Criminal Division

49 Rancocas Road, 1st Floor

Mount Holly, NJ

609-288-9500 ext. 38211

From: Toscano, Taylor <TToscano@co.ocean.nj.us>
Sent: Monday, April 13, 2020 11:29 AM
To: Michelle Consuegra <Michelle.Consuegra@njcourts.gov>; Jennifer Gottschalk <jgottschalkesq@gmail.com>; Janice Kennedy <janice.kennedy@njcourts.gov>
Cc: Annemarie Midiri <Annemarie.Midiri@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>
Subject: RE: [External]State v. Hone, PG 20-607, W-2020-116-1506

I am still waiting to hear back from the victim on this new motion for her input. Not sure if I will hear from her by then, and I would still need time to prepare a response. I believe tomorrow would be too soon. Can this be scheduled for late this week or early next week please?

From: Michelle Consuegra <Michelle.Consuegra@njcourts.gov>
Sent: Monday, April 13, 2020 11:24 AM
To: Jennifer Gottschalk <jgottschalkesq@gmail.com>; Janice Kennedy <janice.kennedy@njcourts.gov>;
Toscano, Taylor <TToscano@co.ocean.nj.us>
Cc: Annemarie Midiri <Annemarie.Midiri@njcourts.gov>; Charles Marvin <charles.marvin@njcourts.gov>
Subject: RE: [External]State v. Hone, PG 20-607, W-2020-116-1506

It can be scheduled for tomorrow, are you both available?

Michelle Consuegra

Assistant Division Manager, Pretrial Services

Criminal Division

49 Rancocas Road, 1st Floor

Mount Holly, NJ

609-288-9500 ext. 38211

From: Jennifer Gottschalk <jgottschalkesq@gmail.com>
Sent: Monday, April 13, 2020 10:55 AM
To: Janice Kennedy <janice.kennedy@njcourts.gov>; Michelle Consuegra
<Michelle.Consuegra@njcourts.gov>; TToscano@co.ocean.nj.us
Subject: [External]State v. Hone, PG 20-607, W-2020-116-1506

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.

I am attaching materials I have just filed in e-courts. It is a new motion to modify conditions of pre-trial release on behalf of my client, Richard Hone.

Please schedule it at the earliest possible date.

Thanks!

Jennifer Gottschalk

--

JENNIFER L. GOTTSCHALK, ESQUIRE

1920 Fairfax Avenue

Cherry Hill, New Jersey 08003

NJ Bar ID 003391980

phone- [REDACTED]

fax-(856)295-8939

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--

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Cherry Hill, New Jersey 08003

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phone- [REDACTED]

fax-(856)295-8939

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JENNIFER L. GOTTSCHALK, ESQ.
NJ Bar ID Number 003391980
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003

[REDACTED]
[REDACTED] (fax)
jgottschalkesq@gmail.com
Attorney for defendant Richard Hone

STATE OF NEW JERSEY, Plaintiff,	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY-LAW DIVISION DOCKET NO. W-2020-116-1506
v.	<u>Criminal Action</u>
RICHARD HONE, Defendant.	CERTIFICATION IN SUPPORT OF MOTION TO MODIFY TERMS OF PRE- TRIAL RELEASE

JENNIFER L. GOTTSCHALK, of full age, does certify and say:

1. I am an attorney-at-law of the State of New Jersey and have been assigned as pool counsel to represent defendant Richard Hone in the above-captioned matter. I am familiar with the facts of this case.
2. On April 8, 2020, a motion for modification of the terms of pre-trial release was considered by this Court, and was denied.
3. Another change since then has occurred that would compel lifting the "no contact" provision in the pre-trial release order.
4. On April 9, 2020, the Hon. Gregory Acquaviva, J.S.C., entered an order permitting contact between defendant and [REDACTED], the alleged victim in the present case, for the purposes of allowing him Skype and other supervised contact with their child, [REDACTED]. See Ex. 1.
5. That order sets forth a plan by which the contact is limited and supervised by others than [REDACTED]. As set forth in my client's certification, he is to resume parenting time (in person) with his child for two hours weekly and Skype/teleconferencing contact with her four mornings per week.

6. The order specifies that, "Although [defendant's] parenting time shall remain supervised, such need not be done by IEP Youth Services nor in a reunification context. Rather the parties may utilize the services of a more cost-effective provider (e.g., YMCA, Catholic Charities, Peaceful Healing, etc.) or a mutually agreed upon third-party." The next return date for that matter is June 11, 2020. Ex. 1.

7. It should be emphasized that [REDACTED] is not the supervisor of defendant's contact with the child, according to the April 9 order.

8. As the court is well aware, defendant has constitutional and statutory rights to parent his child.

9. We continue to maintain to the Court that it is reasonable to resume the contact that had existed between defendant and his daughter, [REDACTED], which was prohibited by this Court's order entered on February 21, 2020.

10. I recall that the State argued to this Court that access by defendant to his daughter ought to be controlled in the "FD" docket, which echoes the 2017 order by Judge Justus. Ex. 2.

11. Now that Judge Acquaviva has ordered that defendant may have contact with his daughter, facilitated through [REDACTED], this Court has no reason to continue the "no contact" provision of his pre-trial release.

12. I believe that this Court can consider issues surrounding the interaction between defendant and [REDACTED] and the child resolved in the April 9, 2020 order by Judge Acquaviva, and that the said order should be considered res judicata.

13. 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.

Dated: April 13, 2020

Jennifer L. Gottschalk

Jennifer L. Gottschalk

JENNIFER L. GOTTSCHALK, ESQ.
NJ Bar ID Number 003391980
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003
[REDACTED]

(856)295-8939 (fax)
jgottschalkesq@gmail.com
Attorney for defendant Richard Hone

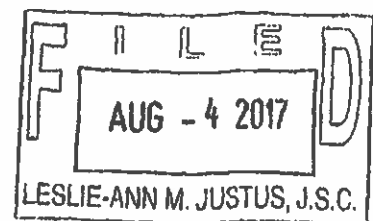
STATE OF NEW JERSEY, Plaintiff,	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY-LAW DIVISION DOCKET NO. W-2020-116-1506
v.	<u>Criminal Action</u>
RICHARD HONE, Defendant.	ORDER GRANTING MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE

THIS MATTER, having been opened to this Court on a motion to modify conditions of pre-trial release brought by defendant Richard Hone, Jennifer L. Gottschalk, Esquire, and Taylor Toscano, Assistant Ocean County Prosecutor, appearing for the State, and the Court, having considered the arguments of counsel and submissions, and for good cause shown;

It is on this day of April, 2020, ORDERED that the "no contact" provision with the victim and the child [REDACTED] in the prior orders of this Court be deleted, in light of the order entered on April 9, 2020, in the matter of [REDACTED] v. Hone, Docket No. FD-13-186-20, in the Superior Court, Chancery Division, Family Part, Monmouth County. All contact with [REDACTED] and [REDACTED] shall forthwith be governed by the orders of the court in Docket FD-13-186-20.

Hon. Mark P. Tarantino, J.S.C.

JOSEPH D. CORONATO
OCEAN COUNTY PROSECUTOR
OCEAN COUNTY PROSECUTOR'S OFFICE
119 HOOPER AVENUE
TOMS RIVER, NEW JERSEY 08754



SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - (CRIMINAL)
MONMOUTH COUNTY
CASE NO. 16-00-0548
INDICTMENT NO. 16-10-2072

STATE OF NEW JERSEY,	:	PERMANENT RESTRAINING
	:	ORDER FOR STALKING
	:	CONVICTION PURSUANT TO <u>N.J.S.A.</u>
	:	2C:12-10.1
Plaintiff,	:	
V.	:	
RICHARD HONE,	:	
Defendant.	:	

THIS MATTER having been brought before the Court on application of Heidi Tannenbaum-Newman, Assistant Ocean County Prosecutor, on behalf of the State of New Jersey, and Patricia Beardon, Esq. of the Monmouth County Public Defender's Office appearing on behalf of the defendant Richard Hone;

WHEREAS on April 17, 2017, the defendant, Richard Hone, pled guilty to a crime of Stalking, a third degree crime in violation of N.J.S.A. 2C:12-10c, for which he was sentenced and convicted on August 4, 2017;

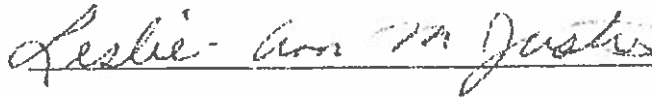
AND the Court having conducted a hearing on the State's application for a permanent restraining order, and the victim [REDACTED] not having requested otherwise;

IT IS THEREFORE on this 4th day of August, 2017 hereby ORDERED that the Defendant, Richard Hone, shall hereafter be permanently subject to a Permanent Restraining Order for said Stalking conviction and be subject to the following conditions pursuant to N.J.S.A. 2C:12-10.1:

1. The defendant Richard Hone is hereby restrained from entering the residence, property, School, or place of employment of the victim [REDACTED], and is hereby required to stay away from the residence and place of employment of [REDACTED]
2. The defendant Richard Hone is hereby restrained from making contact with the victim [REDACTED] whether it be personal contact or contact through an agent, and is restrained from initiating any communication likely to cause annoyance or alarm including, but not limited to, personal, written, or telephone contact, or contact via electronic device, with the victim [REDACTED] her immediately family members, her employers, employees or fellow workers, or others with whom communication would be likely to cause annoyance or alarm to the victim [REDACTED]. *Any and all issues related to the parties' child, [REDACTED], however, shall be controlled by Family Court Docket No. FV-13-01267-17, or by any other duly issued Family Part Order.*
3. "Communication" as proscribed in paragraph 2 herein shall also, pursuant to N.J.S.A. 2C:12-10.1 and N.J.S.A. 2C:1-14q, mean any form of communication made by any means, including, but not limited to, any verbal or written communication; communications conveyed by any electronic communication device, which includes but is not limited to, a wire radio, electromagnetic, photoelectric or photo-optical system; including a cordless, cellular or digital telephone, computer, video recorder, fax machine, pager, or any other

means of transmitting voice or data; and communications made by a sign or gesture.

4. This Permanent Restraining Order shall be in effect throughout the State of New Jersey, and shall be enforced by all law enforcement officers.
5. A violation of this Permanent Restraining Order by the defendant Richard Hone shall constitute an offense under subsection a. of N.J.S.A. 2C:29-9. Violations of this Order may be enforced in a civil or criminal action initiated by the victim [REDACTED] or by the Court, on its own motion, pursuant to applicable court rules. An enforcement action for violation of this Permanent Restraining Order shall not preclude the filing of a criminal complaint for stalking based on the same act which is the basis for the violation.
6. This Permanent Restraining Order may be dissolved upon the application of the victim [REDACTED] to this Court.

_____

HON. LESLIE-ANN JUSTUS, J.S.C.

JENNIFER L. GOTTSCHALK, ESQ.
NJ Bar ID Number 003391980
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003

[REDACTED]
(856)295-8939 (fax)
jgottschalkesq@gmail.com
Attorney for defendant Richard Hone

STATE OF NEW JERSEY, Plaintiff,	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY-LAW DIVISION DOCKET NO. W-2020-116-1506
v.	<u>Criminal Action</u>
RICHARD HONE, Defendant.	NOTICE OF MOTION TO MODIFY CONDITIONS - PRE-TRIAL RELEASE

TO: Taylor Toscano, Esq., Asst. Ocean County Prosecutor
Ocean County Prosecutor's Office
119 Hooper Ave., P.O. Box 2191
Toms River, NJ 08754

Please take notice, on a date to be set by the Court, but as soon as it can be scheduled, defendant Richard Hone, Jennifer L. Gottschalk, Esquire, appearing, shall move for an order modifying conditions of his Pre-Trial release, specifically to delete the "no contact" provision with the victim and the child [REDACTED] in light of the order entered on April 9, 2020, in the matter of [REDACTED] v. Hone, Docket No. FD-13-186-20, in the Superior Court, Chancery Division, Family Part, Monmouth County.

Defendant relies upon the attached certifications and Exhibits in support of this application.

Dated: April 10, 2020

Jennifer L. Gottschalk, Esq.
Jennifer L. Gottschalk, Esq.

JENNIFER L. GOTTSCHALK, ESQ.
NJ Bar ID Number 003391980
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003

[REDACTED]
(856)295-8939 (fax)

jgottschalkesq@gmail.com

Attorney for defendant Richard Hone

STATE OF NEW JERSEY, Plaintiff, v. RICHARD HONE, Defendant.	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY-LAW DIVISION DOCKET NO. W-2020-116-1506 Criminal Action CERTIFICATION IN SUPPORT OF MOTION TO MODIFY TERMS OF PRETRIAL RELEASE
---	--

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

1. I am the defendant in the above-captioned matter. I am fully familiar with the facts of this case.
2. On April 8, 2020, I appeared with my attorney before this Court for a motion for modification of the terms of pre-trial release. It was denied.
3. On April 9, 2020, I appeared before the Hon. Gregory Acquaviva, J.S.C., Docket No. FD-13-186-20, with [REDACTED] regarding custody and support issues between her and me about our child, [REDACTED]. Those reliefs that were granted are reflected in the order Attached.
4. Judge Acquaviva entered an order permitting contact between N.T. and me, for the purposes of allowing me Skype and other supervised contact with my daughter, [REDACTED].
5. The order included a provision that my parenting time with [REDACTED] resume for two hours per week, and that I may Skype or

[Handwritten signature]

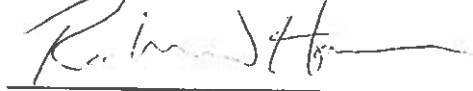
have other teleconference contact with my daughter every Sunday, Tuesday, Thursday, and Saturday at 10 a.m.

6. I have been without my child for nearly her entire life, and I have been devastated and heartbroken for that entire time. I have worked tirelessly to finally have visits, calls, updates, and I just got what I have been praying so hard for, and on June 11th 2020 I believe I will have even more parenting time at the June 11th hearing, where additional parenting time is again addressed, and am asking the court to simply abide by the controlling family docket here and allow what Judge Gregory L. Acquaviva J.S.C. ordered. which poses the only bar to my parenting her.

7. 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.

Dated: April 12, 2020

A handwritten signature in black ink, appearing to read "Richard Hone", written over a horizontal line.

Richard Hone

PREPARED BY THE COURT
RICHARD HONE,

Plaintiff

vs.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION/FAMILY PART
MONMOUTH COUNTY
CIVIL ACTION ORDER

Defendant

**DOCKET NO. MON-C-8-20 (formerly
MID-C-171-17)**

Plaintiff

vs.

RICHARD HONE,

Defendant

DOCKET NO. FD-13-186-20,

RICHARD HONE,

Plaintiff

vs.

DOCKET NO. MON-C-152-19,

Defendant

THESE MATTERS having been opened by the Court, the Court having reviewed the papers, both parties appearing telephonically, having heard oral argument, for good cause shown, and for the reasons stated on the record,

IT IS on this 9th day of April, 2020, **ORDERED** that:

1. On March 16, 2020, Mr. Hone voluntarily dismissed, with prejudice, all claims under MON-C-152-19. On the record on April 9, 2020, Mr. Hone similarly dismissed, with

prejudice, all related claims regarding property in a storage locker under MON-C-8-20.

2. Mr. Hone's motion for reconsideration of the March 13, 2020 Orders granting Ms. [REDACTED] motion to vacate default, granting in part Ms. [REDACTED] motion for summary judgment, and denying Mr. Hone's motion for summary judgment is **DENIED**.
3. Mr. Hone's December 23, 2019 motion for reconsideration of the December 19, 2019 Order on the FD docket is **GRANTED, in part; DENIED, in part**. The December 19, 2019 Order shall be modified as follows:
 - a. The limitations on social media are circumscribed. Mr. Hone is only prohibited from disparaging or harassing Ms. [REDACTED] in any form to any third party through any medium;
 - b. Mr. Hone may utilize the Ocean County NJ Workforce program, rather than its Monmouth County equivalent;
 - a. Other than as modified herein, supra, the December 19, 2019 Order remains in full force and effect.
4. Mr. Hone's January 7, 2020 motion for reconsideration is **GRANTED, in part; DENIED, in part**.
 - a. With respect to parenting time modification, such shall be addressed infra.
 - b. With respect to communications, due to the parties' financial limitations, the parties shall utilize AppClose (a free, web-based application) for amicable communications, limited to the minor child, instead of Our Family Wizard (a

April 9, 2020

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web-based application that requires a fee). Neither party shall harass the other during such communications, which shall be limited to the child.

c. All other reliefs requested denied without merit.

5. Mr. Hone's January 23, 2020 request to reconsider the December 19, 2019 Order is **DENIED**, as untimely pursuant to Rule 4:49-2.
6. Mr. Hone's request to modify his child support obligation is **GRANTED**, in part. Mr. Hone's child support obligation is modified, retroactive to October 4, 2017, to \$95 per week. Probation shall adjust its records accordingly.
7. Mr. Hone's April 7, 2020 motion to exclude evidence related to child support untimely submitted by Ms. Tadros is **DENIED**.
8. Mr. Hone's February 5, 2020 request to enforce that all communications be through Our Family Wizard is **GRANTED**, in part. All communications shall be through AppClose, unless otherwise ordered herein.
9. Mr. Hone's February 5, 2020 request for the incarceration of Ms. [REDACTED] is **DENIED**.
10. Mr. Hone's February 5, 2020 request to charge Ms. [REDACTED] with harassment and contempt is **DENIED**.
11. Mr. Hone's request to recuse Judge Bernstein is **MOOT**.
12. Mr. Hone's request to amend FV-13-1267-17 to show completion of Batterer's Intervention is **MOOT**, as that restraining order has been dismissed.
13. Mr. Hone's request for a change of venue is **MOOT**.
14. Mr. Hone's request for updates on educational, health, and social growth of [REDACTED] is **GRANTED**, in part. Parties shall communicate no less than once per week.

through AppClose in amicable, non-harassing manner regarding the minor child and her development.

15. Mr. Hone's request to vacate arrears is **GRANTED, in part**. Mr. Hone's child support arrears shall be reduced as per Paragraph 6, supra.
16. Mr. Hone's request to stay enforcement of his child support obligation (i.e., stay bench warrants) and Ms. [REDACTED] request to enforce child support are **GRANTED, in part**. Enforcement of Mr. Hone's child support obligation is temporary suspended through August 1, 2020. Probation shall adjust its records.
17. All custody and parenting time related issues, including but not limited to, sufficiency of Mr. Hone's previously submitted reports, his requests for compensatory parenting time, his request for parenting time sanctions, his request for damages due to missed parenting time, his request to modify legal and residential/parenting time custody, and his request for access to the minor child's medical records, shall be addressed as follows:
 - a. The parenting time enumerated in the December 19, 2020 Order is modified, pendente lite, as follows:
 - i. Although Mr. Hone's parenting time shall remain supervised, such need not be done by IEP Youth Services nor in a reunification context. Rather the parties may utilize the services of a more cost-effective provider (e.g., YMCA, Catholic Charities, Peaceful Healing, etc.) or a mutually agreed upon third-party. If done outside the therapeutic

April 9, 2020

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reunification context, Mr. Hone's parenting time shall be two hours per week;

- ii. The cost share of any supervised parenting time shall be shared by the parties, 75/25, with Mr. Hone paying 75 percent.
- iii. Mr. Hone's supervised Skype or teleconference contact is increased to every Sunday, Tuesday, Thursday, and Saturday at 10 a.m.
- iv. Parties shall appear on June 11, 2020 at 11 a.m. for a review of Mr. Hone's parenting time.

- b. All other related reliefs shall progress towards a plenary hearing. Should either party seek to retain an expert (individually or joint) or obtain a Custody Neutral Assessment, any expert or assessor shall be retained no later than May 1, 2020. The parties shall cooperate with any retained expert. No later than May 30, 2020, the parties shall propound discovery on each other, limited to interrogatories and document requests. All requests shall be responded to no later than June 30, 2020. For purposes of discovery, each party shall create a dedicated email address. No later than April 16, 2020, each party shall, through AppClose, communicate that email address to the other party. Court shall conduct a case management conference on July 15, 2020 at 11 a.m., at which point a plenary hearing date(s) shall be assigned, and pre-trial requirements shall be set.

- 18. Mr. Hone's request to vacate the Custodial Settlement Agreement and damages incurred therein due to duress and/or intoxication shall too be addressed at the plenary

hearing, and discovery with respect to those issues shall adhere to the same time limitations.

19. Mr. Hone's January 14, 2020 request for the Court to pay for his evaluations, parenting time, and Our Family Wizard is **DENIED**.

20. Mr. Hone's request to modify the Custodial Settlement Agreement such that he is not responsible for health insurance is **GRANTED, in part**. The minor is currently on NJFamilyCare. Should health insurance become available to either party through their employment, at a reasonable cost, such shall be obtained, with the parties sharing in such, consistent with their percentages of income pursuant to the Child Support Guidelines.

21. Ms. [REDACTED] request to enforce the Custodial Settlement Agreement and Mr. Hone's November 16, 2017 request to amend the Custodial Settlement Agreement are both **GRANTED, in part**. To the extent not modified via subsequent Court order, the CSA remains in full force and effect.

22. Mr. Hone's challenge to his original imputation of income under the prior order is **DENIED**.

23. Mr. Hone's request to prohibit Ms. [REDACTED] from engaging in any illegal conduct is **GRANTED, in part**. Neither party shall engage in any illegal activity in the presence of the child.

24. Mr. Hone's February 5, 2020 request to "order counseling" is **DENIED**.

MON-C-8-20
FD-13-186-20
MON-C-152-19
April 9, 2020

FILED AND SERVED ELECTRONICALLY – 4.9.20

25. Mr. Hone's request for child support credit for 90 days to 1 year is **DENIED**.

26. Mr. Hone's request for the Court to order a risk assessment and for the Court to pay for such is **MOOT**. Requirement was part of since dismissed final restraining order on docket FV-13-1267-17.

/s/ Gregory L. Acquaviva
HON. GREGORY L. ACQUAVIVA, J.S.C.

For Reasons Stated on the Record

Khajezadeh, Dina

From: Jennifer Gottschalk <jgottschalkesq@gmail.com>
Sent: Wednesday, April 15, 2020 8:40 PM
To: Toscano, Taylor; allendev@njdcj.org
Subject: State v. Richard Hone, W-2020-116-1506
Attachments: filed motion remove OCPO.pdf; filed motion to transfer.pdf

Please be advised that the attached motions were filed today on e-courts.

Regards,
Jennifer Gottschalk

--

JENNIFER L. GOTTSCHALK, ESQUIRE

1920 Fairfax Avenue

Cherry Hill, New Jersey 08003

NJ Bar ID 003391980

phone- [REDACTED]

fax-(856)295-8939

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JENNIFER L. GOTTSCHALK, ESQ.
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1920 Fairfax Avenue
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[REDACTED]
(856)295-8939 (fax)
jgottschalkesq@gmail.com
Attorney for defendant Richard Hone

STATE OF NEW JERSEY,
Plaintiff,

v.

RICHARD HONE,
Defendant.

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY-LAW DIVISION
DOCKET NO. W-2020-116-1506

Criminal Action

MOTION TO REMOVE OCEAN
COUNTY PROSECUTOR'S OFFICE AS
PROSECUTING AGENCY IN CASE

TO: Taylor Toscano, Esq., Asst. Ocean County Prosecutor
Ocean County Prosecutor's Office
119 Hooper Ave., P.O. Box 2191
Toms River, NJ 08754

Veronica Allende, Esq. Director
N.J. Division of Criminal Justice
P.O. Box 085
Trenton, NJ 08625

Please take notice, on April 21, 2020, at 2:30 p.m., or as soon thereafter as counsel may be heard, defendant Richard Hone, by his attorney, Jennifer L. Gottschalk, Esq., shall move before the Hon. Mark P. Tarantino, J.S.C., for an order removing the above-captioned case from the Ocean County Prosecutor's Office as prosecuting agency and assigning the Attorney General's Office in its place. This arises from a conflict of interest in the Ocean County Prosecutor's Office's continued involvement in the criminal case.

Defendant relies upon the attached certification in support of his motion. He requests oral argument in this matter.

Dated: April 15, 2020

Jennifer L. Gottschalk

Jennifer L. Gottschalk, Esq.

JENNIFER L. GOTTSCHALK, ESQ.
NJ Bar ID Number 003391980
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003

[REDACTED]
(856)295-8939 (fax)
jgottschalkesq@gmail.com
Attorney for defendant Richard Hone

STATE OF NEW JERSEY,
Plaintiff,

v.

RICHARD HONE,
Defendant.

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY-LAW DIVISION
DOCKET NO. W-2020-116-1506

Criminal Action

ORDER GRANTING MOTION TO
REMOVE OCEAN COUNTY
PROSECUTOR'S OFFICE AS
PROSECUTING AGENCY AND
APPOINTING ATTORNEY GENERAL'S
OFFICE AS PROSECUTOR

THIS MATTER, having been opened to this Court on a motion to remove the Ocean County Prosecutor's Office as the prosecuting agency in this case and appoint the Attorney General's Office as prosecutor herein, brought by defendant Richard Hone, Jennifer L. Gottschalk, Esquire, and Taylor Toscano, Assistant Ocean County Prosecutor, appearing for the State, and notice having been given to the New Jersey Division of Criminal Justice, Office of the Attorney General, and the Court, having considered the arguments of counsel and submissions, and for good cause shown;

It is on this day of April, 2020, ORDERED that the Ocean County Prosecutor's Office is removed as the prosecuting agency in this case, and the Attorney General's Office is appointed to prosecute this matter.

Hon. Mark P. Tarantino, J.S.C.

JENNIFER L. GOTTSCHALK, ESQ.
NJ Bar ID Number 003391980
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003
[REDACTED]

(856)295-8939 (fax)
jgottschalkesq@gmail.com
Attorney for defendant Richard Hone

STATE OF NEW JERSEY,
Plaintiff,

v.

RICHARD HONE,
Defendant.

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY-LAW DIVISION
DOCKET NO. W-2020-116-1506

Criminal Action

CERTIFICATION OF COUNSEL

JENNIFER L. GOTTSCHALK, of full age, does certify and say:

1. I am an attorney-at-law of the State of New Jersey. I have been assigned to represent the defendant in the above-captioned matter as pool counsel for the Public Defender's Office. I am familiar with the facts of the case.

2. In the course of representing my client, I have learned that he has a lawsuit pending against the Ocean County Prosecutor's Office, Docket No. OCN-L-692-20, based upon alleged misconduct by that office and Hon. Marlene Lynch Ford, A.J.S.C., the assignment judge for the Superior Court in Ocean County. That case is captioned "Richard Hone, Plaintiff, Pro Se, v. Marlene Lynch-Ford AJSC, John and Jane Does(s) 1-100 All Ocean County Prosecutors Defendant."

3. The present criminal case was moved out of Ocean County to Burlington County because of the conflict with its being heard in Ocean County.

4. It is a conflict of interest for the Ocean County Prosecutor's Office to continue its role in the current criminal case because of its role as a defendant in Mr. Hone's civil lawsuit against it.

5. Given the breadth of the charges, I believe the appropriate agency to take over the prosecution is the New Jersey Division of Criminal Justice of the state Attorney General's Office, who oversees the prosecution of criminal cases throughout this state.

6. I am concerned that my client will not be treated fairly by the current prosecuting agency if it is permitted to remain in the case.

7. 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.

Dated: April 15, 2020

Jennifer L. Gottschalk
Jennifer L. Gottschalk

JENNIFER L. GOTTSCHALK, ESQ.
NJ Bar ID Number 003391980
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003

[REDACTED]
(856)295-8939 (fax)
jgottschalkesq@gmail.com
Attorney for defendant Richard Hone

STATE OF NEW JERSEY, Plaintiff,	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY-LAW DIVISION DOCKET NO. W-2020-116-1506
v.	<u>Criminal Action</u>
RICHARD HONE, Defendant.	NOTICE OF MOTION TO TRANSFER ACTION TO CHANCERY DIVISION, FAMILY PART

TO: Taylor Toscano, Esq., Asst. Ocean County Prosecutor
Ocean County Prosecutor's Office
119 Hooper Ave., P.O. Box 2191
Toms River, NJ 08754

Veronica Allende, Esq., Director
New Jersey Division of Criminal Justice
P.O. Box 085
Trenton, NJ 08625

Please take notice, on May 13, 2020, at 9 a.m., or as soon thereafter as counsel may be heard, defendant Richard Hone, by his attorney, Jennifer L. Gottschalk, Esq., shall move for an order transferring the above-captioned matter to the Superior Court, Chancery Division, Family Part, pursuant to R.3:1-5, and R.5:1-2(c), before the Hon. Jeanne T. Covert, A.J.S.C.

Defendant relies upon the attached certification in support of his motion. He requests oral argument in this matter.

Dated: April 15, 2020

Jennifer L. Gottschalk
Jennifer L. Gottschalk, Esq.

JENNIFER L. GOTTSCHALK, ESQ.
NJ Bar ID Number 003391980
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003

[REDACTED]
(856)295-8939 (fax)
jgottschalkesq@gmail.com
Attorney for defendant Richard Hone

STATE OF NEW JERSEY,
Plaintiff,

v.

RICHARD HONE,
Defendant.

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY-LAW DIVISION
DOCKET NO. W-2020-116-1506

Criminal Action

ORDER GRANTING MOTION TO
TRANSFER CRIMINAL MATTER TO
CHANCERY DIVISION, FAMILY PART

THIS MATTER, having been opened to this Court on a motion to transfer the criminal matter to the Chancery Division, Family Part, brought by defendant Richard Hone, Jennifer L. Gottschalk, Esquire, appearing, and [REDACTED], appearing for the State, [and notice having been given to the New Jersey Division of Criminal Justice, Office of the Attorney General], and the Court, having considered the arguments of counsel and submissions, and for good cause shown;

It is on this [REDACTED] day of May, 2020, ORDERED that the criminal matter is transferred to the Superior Court, Chancery Division, Family Part, in the Burlington vicinage.

Hon. Jeanne T. Covert, A.J.S.C.

JENNIFER L. GOTTSCHALK, ESQ.
NJ Bar ID Number 003391980
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Cherry Hill, New Jersey 08003
[REDACTED]
(856)295-8939 (fax)
jgottschalkesq@gmail.com
Attorney for defendant Richard Hone

STATE OF NEW JERSEY, Plaintiff,	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY-LAW DIVISION DOCKET NO. W-2020-116-1506
v.	<u>Criminal Action</u>
RICHARD HONE, Defendant.	CERTIFICATION IN SUPPORT OF MOTION TO TRANSFER ACTION TO CHANCERY DIVISION, FAMILY PART

JENNIFER L. GOTTSCHALK, of full age, does certify and say:

1. I am an attorney-at-law of the State of New Jersey. I am assigned to represent the defendant in the above-captioned matter as pool counsel for the Public Defender's Office. I am familiar with the facts of the case.

2. On February 10, 2020, my client was charged by warrant complaint W-2020-116-1506 with one count of violating a court order/contempt, in violation of N.J.S.A. 2C:29-9a (fourth degree) and one count of harassment, in violation of N.J.S.A. 2C:33-4 (a petty disorderly persons offense).

3. The alleged victim, [REDACTED], alleged that my client was harassing her through text message and email communications, and that this conduct violated a prior permanent restraining order entered by the Hon. Leslie Justus, J.S.C., on August 4, 2017.

4. [REDACTED] obtained a temporary restraining order against my client based upon that alleged criminal contact with her.

5. [REDACTED] and my client have a child together, [REDACTED], whose date of birth is [REDACTED]. Since the entry of the court order in 2017, my client had been permitted contact, both electronically and in person, with his daughter.

6. After my client was charged with these recent charges, the court ordered him to have no contact with his daughter.

7. On April 2, 2020, a hearing on the temporary restraining order was conducted by the Hon. Angela White Dalton, J.S.C. She dismissed the restraining order, finding insufficient proof of the alleged conduct.

8. I am filing the present motion on my client's behalf to transfer the present case to the Family Part of the Chancery Division because the case involves a matter arising from matters in both the "FV" docket and the "FD" docket of the Family Part.

9. My client has repeatedly expressed his desire to be able to parent his daughter. The vehicle by which a criminal case can be transferred from the Law Division to the Family Part would serve my client's and his child's best interests, as the underlying issues in the criminal case arise from parenting time and child custody issues.

10. I have advised my client that in order for the transfer of the case to occur, he must waive his right to a jury trial under the respective court rules.

11. He has advised that he waives of his right to a jury trial and voluntarily waives that right so that the case can proceed in the Family Part.

12. Parenting issues involving his daughter are currently being adjudicated in Superior Court, Monmouth County, under Docket FD-13-186-20.

13. 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.

Dated: April 15, 2020

Jennifer L. Gottschalk
Jennifer L. Gottschalk

Khajezadeh, Dina

From: eCourts.Mailbox@Judiciary.State.NJ.US
Sent: Friday, April 17, 2020 4:10 PM
To: Toscano, Taylor; JGOTTSCALKESQ@GMAIL.COM;
ECOURTSNOTICE@CO.BURLINGTON.NJ.US
Subject: NJ eCourts Filing Notification - Criminal Case BUR-20-000607 - Hone, Richard

SUPERIOR COURT OF NEW JERSEY - eCOURTS

The following was filed by TAYLOR E TOSCANO on 04/17/2020 at 4:08 PM:

Defendant Name: RICHARD HONE

Case Caption: STATE OF NEW JERSEY VS RICHARD HONE

Case Number: [Criminal BUR-20-000607](#)

Docket Text: Response to Motion - BRIEF - submitted by TAYLOR E TOSCANO of OCEAN COUNTY PROSECUTORS OFFICE on behalf of the State of NJ re: MODIFY PRETRIAL RELEASE CONDITIONS

Transaction ID: [CRM2020330631](#)

Notice has been electronically mailed to:

Prosecuting Attorney	TAYLOR E TOSCANO	TTOSCANO@CO.OCEAN.NJ.US
Defense Attorney for	JENNIFER L GOTTSCHALK RICHARD HONE	JGOTTSCALKESQ@GMAIL.COM
County Prosecutor	BURLINGTON COUNTY	ECOURTSNOTICE@CO.BURLINGTON.NJ.US

Notice was not electronically mailed to:

Prosecuting Attorney Not assigned in PROMIS/Gavel 49 RANCOCAS ROAD
MT. HOLLY, NJ

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

For questions, please contact the Criminal Division, State of NJ Judiciary, in the county of venue.

This communication is for notification purposes only.

This email was sent from a notification-only address that cannot accept incoming mail. Please do not reply to this message.

Khajezadeh, Dina

From: Toscano, Taylor <TToscano@co.ocean.nj.us>
Sent: Friday, April 17, 2020 4:20 PM
To: Janice Kennedy
Subject: RE: [External]Richard Hone (20000607)

Thank you! Have a good weekend!

Taylor

From: Janice Kennedy <janice.kennedy@njcourts.gov>
Sent: Friday, April 17, 2020 4:18 PM
To: Toscano, Taylor <TToscano@co.ocean.nj.us>; Jennifer Gottschalk <jgottschalkesq@gmail.com>
Subject: RE: [External]Richard Hone (20000607)

I've printed everything for Judge Tarantino.

*Janice Y. Kennedy
Secretary to the Hon. Mark P. Tarantino, J.S.C.
Superior Court of New Jersey
Burlington Vicinage-Criminal Division
49 Rancocas Road
Mount Holly, NJ 08060
609-288-9500, x38806
Fax 609-826-7072*

From: Toscano, Taylor <TToscano@co.ocean.nj.us>
Sent: Friday, April 17, 2020 4:15 PM
To: Janice Kennedy <janice.kennedy@njcourts.gov>; Jennifer Gottschalk <jgottschalkesq@gmail.com>
Subject: [External]Richard Hone (20000607)

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.

Good afternoon,

Attached you'll find my response to defense counsel's multiple motions, which I've also filed on eCourts. I apologize for the end of the week submission, however, with defense counsel filing the motion to disqualify the Ocean County Prosecutor's Office on April 15, 2020, my office had to reach out to the Attorney General's office for their review. I received their response about an hour ago. Thank you!



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

BRADLEY D. BILLHIMER
Ocean County Prosecutor

VINCENT A. PETRECCA
Chief of Detectives



MICHAEL T. NOLAN JR.
First Assistant Prosecutor

ROBERT J. ARMSTRONG
Deputy First Assistant Prosecutor

OFFICE OF THE PROSECUTOR
Courthouse Annex Building
119 Hooper Avenue
P.O. Box 2191
Toms River, New Jersey 08754-2191
732-929-2027

April 76, 2020

The Honorable Mark P. Tarantino, J.S.C.
Via email to Janice Kennedy

RE: State v. Richard Hone (20000607)

Judge Tarantino,

The State is in receipt of defense counsel's motions. By way of background, this defendant was charged on February 10, 2020 with Contempt, specifically violating a permanent restraining order, under 2C:29-9a and Harassment under 2C:33-4a. The defendant was placed on level III pretrial monitoring on February 21, 2020, which included a no contact provision with the victim and the child. Defense counsel previously filed a motion to vacate the no contact provision based on a dismissal of the domestic violence restraining order. Your Honor denied that motion on April 8, 2020. Defense counsel has now filed multiple motions including a motion to disqualify the Ocean County Prosecutor's Office, a motion to transfer divisions, and a motion to modify the defendant's pretrial release conditions.

Procedurally, the State objects to the certification of Jennifer L. Gottschalk Esq. submitted in connection with this case to the extent that it fails to comply with R. 1:6-6. That Rule provides in pertinent part:

"If a motion is based on facts not appearing of record or not judicially noticeable, the court may hear it on affidavits made on personal knowledge, setting forth only facts which are admissible in evidence to which the affiant is competent to testify and which may have annexed thereto certified copies of all papers or parts thereof referred to therein."

Furthermore, the Comment to the rule, notes:

"Thus, in contrast to discovery proceedings, in which responses containing hearsay and other inadmissible material may be perfectly appropriate, affidavits in support of motions must be limited to the affiant's personal knowledge of such facts as he is competent to

testify to and as are admissible in evidence.”

With regard to affidavits by counsel, the Comment states:

Affidavits by attorneys of facts not based on their personal knowledge but related to them by and within the primary knowledge of their clients constitute objectionable hearsay. . . . The requirements of the rule also are not met by affidavits containing argument, other forms of hearsay and general factual or legal conclusions. (cites omitted)

Our courts have often criticized the practice of counsel certifying to facts related to them by clients that are within the client’s primary knowledge and thus objectionable hearsay. Mazur v. Crane’s Mill Nursing Home, 441 N.J. Super. 168, 179-80 (App. Div. 2015); Pascack Bank v. Universal Funding, 419 N.J. Super. 279, 288 (App. Div. 2011); Jameson v. Great Atlantic & Pacif. Tea Co., 363 N.J. Super. 419, 427 (App. Div. 2003), cert. den’d., 179 N.J. 309 (2004); Murray v. Allstate Ins. Co., 209 N.J. Super. 163, 169 (App. Div. 1986) Moreover, the Appellate Division in Claypotch v. Heller, Inc., 360 N.J. Super. 472, 489 (App. Div. 2003) stated that the mandate of the Rule that affidavits be based on personal knowledge is not satisfied by statements prefaced with “To the best of my knowledge and belief” or “on information and belief”. See also, Stowell v. N.J. State Assoc’n of Chiefs of Police, 325 N.J. Super. 512, 520-1 n.2, (App. Div. 1999).

A review of Ms. Gottschalk’s certification clearly demonstrates that it is rife with inadmissible hearsay, as well as general, factual and legal argument or conclusions. Ms. Gottschalk has failed to even provide the civil complaint that her client filed, and has made conclusory statements with regards to the civil suit. Thus, to the extent that the certification fails to comply with R. 1:6-6, it should not be considered by this court.

Regardless of the procedural defect, defendant contends that the Ocean County Prosecutor’s Office should be disqualified because there is an appearance of impropriety based on the fact that the defendant has named this office in a civil suit. By way of background this office only learned of the civil law suit from defense counsel’s filings dated April 15, 2020. To date, defendant has yet to serve the Ocean County Prosecutor’s Office or county counsel with this suit. Upon receipt of this motion, this office reached out to the Attorney General’s office for a conflict review, per office policy. On April 17, 2020 the Attorney General’s office did not deem that this case was a conflict. (See attached letter.)

Although defendant has filed suit naming this office as a party, he has failed to adequately support the proposition that the entire Ocean County Prosecutor’s Office should be disqualified. “An appearance of impropriety must be something more than a fanciful possibility and must have some reasonable basis.” State v. Loyal, 164 N.J. 418, 429 (2000) (internal citations and quotations omitted). Defendant’s motion merely mentions the existence of a suit, however, in the civil complaint, defendant claims that this office has “[c]onspired to violate his 8th and 14th amendment rights by continuing to enforce an order that illegally bars him from communicating with [Ocean County] Courts...” (See attached.) The State presumes the defendant is referencing the February 21, 2020 release order prohibiting contact with the Ocean County Superior Court, a condition that was ordered by a Burlington County Superior Court Judge. This claim lacks any discussion or description of any conduct on the part of the Ocean County Prosecutor’s Office other than the fact that this office is the prosecuting agency for the criminal charge. The Ocean County Prosecutor’s Office is not the enforcing agency for pretrial release conditions, which is a court function. The State submits that does not amount to a

“reasonable basis.” Ibid. Defendant cannot simply make bald, conclusory assertions of impropriety to support his request. Defendant’s allegations are without any merit whatsoever and seem to be part of a larger scheme to unduly delay any criminal proceedings in this matter.

In New York State Association of Criminal Defense Lawyers v. Kaye, the Chief Justice along with several other judges were named in a lawsuit. 95 N.Y.2d 556 (2000). The court held that the judges were “not disqualified automatically merely because they are named parties.” The court reasoned that “[a] judge cannot be disqualified merely because a litigant sues or threatens to sue him or her. We cannot encourage such an easy method of disqualification.” Id. at 561 (quoting In re Vermont Supreme Ct. Admin. Directive No. 17 v. Vermont Supreme Court, 154 Vt. 217, 226). Here, merely naming the Ocean County Prosecutor’s Office in a civil suit is not enough. While this case is only persuasive here, the same rationale should apply. Defendant has not presented anything more than a few bare conclusory allegations submitted by way of his civil complaint. Disqualification cannot be that easy and would only encourage other defendants to file frivolous civil suits in order to obtain a more favorable jurisdiction. In sum, defendant’s claims present an insufficient basis for disqualification of the Ocean County Prosecutor’s Office, especially as presented.

Furthermore, even if the Court were to disqualify the Ocean County Prosecutor’s Office, the relief requested for Your Honor to appoint the Division of Criminal Justice as the “appropriate prosecuting agency” is unlawful since only the Governor can order the Attorney General to supersede in the prosecution of a case. In all other circumstances, the Attorney General’s power to supersede is purely discretionary. The statute governing supersession of a county prosecutor, N.J.S.A. 52:17B-106, provides in pertinent part:

Whenever requested in writing by the Governor, the Attorney General **shall**, and whenever requested in writing by a grand jury or the board of chosen freeholders of a county or the assignment judge of the Superior Court for the county, the Attorney General **may** supersede the county prosecutor for the purpose of prosecuting all of the criminal business of the State in said county, intervene in any investigation, criminal action, or proceeding instituted by the county prosecutor, and appear for the State in any court or tribunal for the purpose of conducting such investigations, criminal actions or proceedings as shall be necessary for the protection of the rights and interests of the State.

Second, defendant filed a motion to transfer the criminal matter to the Chancery Division—Family Part. Defense counsel alleges that this matter encompasses issues regarding the domestic violence docket (FV) and the non-dissolution docket (FD), however, that is simply not true. The defendant’s charges arise out of a violation of a criminal permanent restraining order, not a domestic violence restraining order. As such, the defendant’s case would not be remanded to the Family Part for resolution. Further, the criminal complaint has nothing to do with the defendant’s parenting time, child support, and custody—which would all be handled under the FD docket. Without a docket in the criminal part, the State would be unable to prosecute the defendant based on his charges, and it would essentially dismiss his criminal charges completely.

Lastly, if Your Honor rules that there is no conflict between the defendant and the Ocean County Prosecutor’s Office and denied defendant’s motion to transfer the criminal matter to the Chancery Division—Family Part, defendant requests that Your Honor modify his release conditions. After Your Honor denied defendant’s previous motion to modify his release conditions, the parties had a non-dissolution (FD) hearing the following day, April 9, 2020, in

Monmouth County. At that hearing, Judge Acquaviva ruled on parenting time for the defendant based on documents that were previously submitted to the Court. During that hearing, the parties appeared by telephone and the victim did mention that there was a criminal release order prohibiting contact with the child. At that time, Judge Acquaviva asked the victim if she had a copy of that order, but apparently neither party had the order to provide to the Judge. Without the ability to consider the criminal release order, Judge Acquaviva entered an Order that now conflicts with Your Honor's Order.

After the family hearing, the victim filed a motion to reconsider that order as she now has both the pretrial release order and the order denying defendant's request to modify his release conditions permitting contact with the victim and her child. While the State concedes that a Family Court is the more appropriate court to handle issues of parenting time, the State would argue that the Family Court did not have the full facts to consider when determining whether the defendant should have contact with the child. As such, I would respectfully ask Your Honor to hold off on any decision to modify the current release order pending the outcome of the victim's motion for reconsideration. It is not procedurally practical to modify the current release order to allow contact, only for the Family Division to perhaps reverse its prior decision permitting parenting time. The State has significant concerns with the defendant's prior behavior and the victim is still in fear of this defendant.

Based on all of the above arguments, the State would ask Your Honor to deny defendant's motion to disqualify the Ocean County Prosecutor's Office and the motion to transfer this matter to the Chancery Division—Family Part. The State would respectfully ask Your Honor to withhold any decision regarding contact with the child pending the outcome of the motion to reconsider in the Family Court.

Respectfully submitted,

/s/ Taylor E. Toscano
Assistant Ocean County Prosecutor
Attorney ID No. 153792015

CC: Jennifer L. Gottschalk Esq.



PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF CRIMINAL JUSTICE
PO BOX 085
TRENTON, NJ 08625-0085
TELEPHONE: (609) 984-6500

GURBIR S. GREWAL
Attorney General

VERONICA ALLENDE
Director

Via Electronic Mail

April 17, 2020

First Assistant Prosecutor Michael Nolan
Ocean County Prosecutors Office
119 Hooper Avenue, Box 2191
Toms River, New Jersey 08754

Re: State v. Richard Hone (W-2020-116-1506)

First Assistant Nolan:

Please allow this letter to serve as my official response to your conflict inquiry. Considering the facts presented in the correspondence from your office, including the copy of Mr. Hone's *pro se* civil complaint, this situation does not appear to constitute a direct conflict of interest necessitating supersession by the Division of Criminal Justice. Your office may continue to investigate and prosecute this matter.

With regard to motions filed by Mr. Hone's attorney, Jennifer Gottschalk, Esq., it is my understanding that your office will brief and argue all of the motions. Although Ms. Gottschalk provided my Office with a copy of two of the three Notice of Motion submissions, we will not be entering a formal appearance unless requested by the Court. We ask that you keep us apprised of the decision of the Court to disqualify the entire Ocean County Prosecutor's Office. It is further my understanding that Assistant Prosecutor Taylor Toscano will include in her brief reference to N.J.S.A. 52:17B-106, which deals directly with Mr. Hone and Ms. Gottschalk's request that the Court order the Division of Criminal Justice to prosecute this matter.

Thank you for bringing this matter to our attention.

Very truly yours,

Jeffrey J. Barile, Deputy Attorney General
Deputy Chief - Prosecutors Supervision & Training Bureau

Cc: Veronica Allende, Director, Division of Criminal Justice



Form A

Plaintiff or Filing Attorney Information:

Name Richard Hone
NJ Attorney ID Number Pro SE
Address 24 Johnston Ave
Brick, NJ 08757
Telephone Number _____

ORIGINAL

RICHARD HONE

Plaintiff,

Martene Lynch Ford, Brad Billheimer
John DOES 1-50, JANE DOES 1-50

(includes every ocean County Prosecuting MS. MASCIOTH (sic?)
My Burlington CDE Prosecutor also

Plaintiff, Richard HONE, residing at
(your name)
24 Johnston Ave, City of Brick
(your address)
County of Ocean, (your city or town)
(your county)

Superior Court of New Jersey
Law Division Ocean County
Civil Part
Docket No: _____
(to be filled in by the court)

Civil Action

Complaint

State Of New Jersey, complaining of defendant, states as follows:

1. On February 21, 2020, Mary Lynch Ford, Brad Billheimer MS. Mascioth
John DOES 1-50, JANE DOES 1-50, Defendant (sic)
(name of person being sued)

(Summarize what happened that resulted in your claim against the defendant. Use additional pages if necessary.)

Def. conspired to violate MR. Hone's 8th + 14th Amendment by continuing
to enforce an order that illegally bars communication w/ SC Court
for which I have NEVER been served properly, and for a (201
Case that has been closed for years, my 90 day sentence
was served, and the docket # does not exist/is not active.

The defendant in this action resides at 120 + 119 Hooper Ave, Toms River
(defendant's address)
In the County of Ocean, State of New Jersey.
(name of county where defendant lives)

2. Plaintiff is entitled to relief from defendant under the above facts.

Form A

3. The harm that occurred as a result of defendant's acts include: (list each item of damage and injury)

1. Plaintiff suffers severe emotional harm which
will never be adequately remedied by money alone
2. Plt's due process rights to "Access to the Courts"
has been illegally denied
3. Plt's demands 50 million dollars in Compensatory
& Punitive Damages

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated: 3/1/20 Signature: Richard A. [Signature]

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 3/1/20 Signature: Richard A. [Signature]

OPTIONAL: If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court Rules 1:8-2(b) and 4:35-1(a).

Dated: 3/1/20 Signature: Richard A. [Signature]



Civil Case Information Statement (CIS)

Use for initial Law Division
Civil Part pleadings (not motions) under *Rule 4:5-1*
**Pleading will be rejected for filing, under *Rule 1:5-6(c)*,
if information above the black bar is not completed
or attorney's signature is not affixed**

For Use by Clerk's Office Only

Payment type: ☐ ck ☐ cg ☐ ca

Chg/Ck Number:

Amount:

Overpayment:

Batch Number:

Attorney/Pro Se Name

Richard Hone

Telephone Number

[REDACTED]

County of Venue

Ocean

Firm Name (if applicable)

Pro-SE

Docket Number (when available)

Office Address

c/o 24 Johnston Ave
Brick, NJ 08724

Document Type

Complaint

Jury Demand

☒ Yes

☐ No

Name of Party (e.g., John Doe, Plaintiff)

Richard Hone
Plaintiff

Caption

Richard Hone v. Lynch Ford
Mascott, ET ALs (1-106)

Case Type Number
(See reverse side for listing)

005

Are sexual abuse claims
alleged?

☐ Yes

☒ No

Is this a professional malpractice case?

☐ Yes

☒ No

If you have checked "Yes," see N.J.S.A. 2A:53A-27 and applicable case law
regarding your obligation to file an affidavit of merit.

Related Cases Pending?

☐ Yes

☒ No

If "Yes," list docket numbers

Do you anticipate adding any parties
(arising out of same transaction or occurrence)?

☒ Yes

☐ No

Name of defendant's primary insurance company (if known)

☐ None

☒ Unknown

The Information Provided on This Form Cannot be Introduced into Evidence.

Case Characteristics for Purposes of Determining if Case is Appropriate for Mediation

Do parties have a current, past or recurrent relationship?

☐ Yes

☒ No

If "Yes," is that relationship:

☐ Employer/Employee

☐ Friend/Neighbor

☐ Other (explain)

☐ Familial

☐ Business

Does the statute governing this case provide for payment of fees by the losing party?

☐ Yes

☒ No

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition



Do you or your client need any disability accommodations?

☐ Yes

☒ No

If yes, please identify the requested accommodation:

Will an interpreter be needed?

☐ Yes

☒ No

If yes, for what language?

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

Attorney Signature:

Richard Hone 3/1/20

Khajezadeh, Dina

From: Jennifer Gottschalk <jgottschalkesq@gmail.com>
Sent: Friday, April 17, 2020 5:45 PM
To: Toscano, Taylor; Janice Kennedy
Subject: State v. Richard Hone reply
Attachments: LT J Tarantino.pdf; New Dkt BUR-L-699-20.pdf; Order changing venue J L Ford.pdf

Good afternoon,
I have uploaded our reply to the State's filing onto e-courts. Ms. Toscano, will be you forwarding it to DAG Basile?
thank you,
Jennifer Gottschalk

--
JENNIFER L. GOTTSCHALK, ESQUIRE
1920 Fairfax Avenue
Cherry Hill, New Jersey 08003
NJ Bar ID 003391980
phone-[REDACTED]
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April 17, 2020

Hon. Mark P. Tarantino, J.S.C.
Superior Court, Law Division
Burlington County Courts Facility
P.O. Box 6555
Mount Holly, NJ 08060

RE: State v. Richard Hone
Docket No. W-2020-116-1506

Your Honor:

I represent defendant Richard Hone in the above-captioned matter. Please accept this letter in lieu of a formal brief, in reply to the State's response to two motions filed on defendant's behalf that are returnable on April 21, 2020.

With respect to our motion to modify the terms of defendant's pre-trial release, we have based our motion on the clear language of the order entered by Judge Acquaviva. As indicated in that order, the contact between defendant and his daughter shall be monitored by a third party, not the alleged victim here, [REDACTED]. Furthermore, the prosecutor has in the past, and at the April 8 hearing in this Court, taken the position that the issue of contact with the child ought to be governed under an FD docket. Judge Acquaviva's court is that FD venue; he has reviewed those issues and entered an appropriate order granting parenting time.

The assistant prosecutor makes assertions about a colloquy between the court and the parties during the FD hearing on April 9, 2020. The assistant prosecutor does not provide the source of those assertions, so one is left to wonder if the representations are based upon what [REDACTED] has told her. If that is so, I believe that this

Court should disregard them, unless the assistant prosecutor can provide a recording of the proceeding or can offer a sworn statement of [REDACTED] setting forth the accuracy of that information. Certainly there is no reference to those further "conditions" to which the assistant prosecutor alludes in the April 9 order.

Concerning the motion to remove the Ocean County Prosecutor's Office, the assistant prosecutor apparently questions the merit of the civil lawsuit naming her office as a party defendant. It is premature for any such determination of that issue. The suit was filed on March 10, 2020.

For the present, this Court should view the conflict between the Ocean County Prosecutor's Office and defendant as real. I believe that this Court can take direction from the actions of Assignment Judge Ford in Ocean County, a named defendant in that lawsuit. She transferred the lawsuit, Docket OCN-L-692-20, to the Burlington vicinage on March 13, 2020, and it now bears Docket BUR-L-688-20. See attached exhibits.

It bears noting that defendant's contact with the judicial system has not remained in Ocean County, where he resides. The criminal case against him in 2017 that was the basis for the permanent restraining order was handled by the Ocean County Prosecutor's Office appearing in Monmouth County. Now, he is being prosecuted by the same agency, the Ocean County Prosecutor's Office, in this Court in Burlington County. Our motion to remove the prosecutor's office and appoint the Attorney General's Office in its place may be deemed a suggestion. Even if this Court lacks the authority to appoint a replacement prosecutor, it is clear that the Ocean County Prosecutor's Office has the appearance of impropriety in insisting that it continue its role as defendant's prosecutor while he has a

JENNIFER L. GOTTSCHALK, ESQ.

April 17, 2020

Page Number 3

lawsuit pending against it.

Based upon the foregoing, we respectfully request that this Court grant our motions to modify terms of defendant's pre-trial release and to remove the Ocean County Prosecutor's Office from the case.

Respectfully submitted,



Jennifer L. Gottschalk, Esquire

w/encl.

c: Taylor Toscano, Esq., Asst. Ocean County Prosecutor

SUPERIOR COURT OF NEW JERSEY - eCOURTS CIVIL LAW

The following was filed by on 03/19/2020:

Plaintiff Name :	RICHARD HONE
Defendant Name :	BRAD BILHIMER, MARLENE L FORD, JANE DOES 1-50, JOHN DOES 1-50
Case Caption :	HONE RICHARD VS FORD MARLENE
Case Number :	OCN L 000692-20
Docket Text :	This case has been transferred from OCN-L-692-20 to BUR-L-688-20
Transaction ID :	LCV2020561377

Notice has been electronically mailed to:

Notice was not electronically mailed to:

Plaintiff	RICHARD HONE	
Defendant	BILHIMER, BRAD	NJ 00000
Defendant	FORD, MARLENE, L	NJ 00000
Defendant	JANE DOES 1-50	NJ 00000
Defendant	JOHN DOES 1-50	NJ 00000

Login to eCourts to view the Case Jacket. You will need a valid user ID (Bar ID) to view the submitted documents.

For questions, please contact the Superior Court of New Jersey Civil Division in county of venue.

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Marlene Lynch Ford
MARLENE LYNCH FORD, A.J.S.C.