

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION – CIVIL PART

BURLINGTON COUNTY

JOSEPH FABOZZI,

Plaintiff,

v.

JENNIFER OLLAND; TOWNSHIP OF MOUNT LAUREL, et al.,

Defendants.

DOCKET NO.: BUR-L-2334-25

PLAINTIFF’S REQUESTS FOR ADMISSIONS

TO DEFENDANT JENNIFER OLLAND

Pursuant to Rule 4:22-1 of the New Jersey Rules of Court, Plaintiff Joseph Fabozzi requests that Defendant Jennifer Olland admit or deny the following matters within the time required by the Rules.

DEFINITIONS

“Communication” means any oral, written, or electronic transmission of information, including but not limited to emails, text messages, letters, phone calls, or social media messages.

“Document” means any writing, recording, or electronically stored information, including emails, reports, notes, memoranda, body-camera recordings, text messages, letters, and any other form of recorded information.

“Complaint” means any allegation, report, accusation, or communication asserting misconduct, criminal conduct, harassment, or other improper behavior, including any citizen criminal complaint, affidavit of probable cause, or written statement submitted to the Mount Laurel Police Department or the Mount Laurel Municipal Court.

“Civil lawsuit” means the action filed by Plaintiff Joseph Fabozzi against Defendant Jennifer Olland in the Superior Court of New Jersey, Ocean County, under Docket No. OCN-L-002231-22.

REQUESTS FOR ADMISSION

1. Admit that on or about March 1, 2022, you reported to Terrance Campbell of the New Jersey Division of Child Protection and Permanency that

Plaintiff Joseph Fabozzi stated at a Sweet Sixteen party that “the girls will be so fuckable when they turn 18.”

See Exhibit 1: YouTube Video Terrance Campell at Waretown PD:

<https://youtu.be/8caqKfCAJV0>

See Exhibit 2: Transcript Campbell at Waretown PD

2. Admit that you were the “JO” referenced in the February 15, 2023 letter from Bonnie E. Fraser, Esq., stating that “Mr. Campbell read the allegations reported by JO on March 1, 2022.”

See Exhibit 3: Letter from Bonnie Frasier

3. Admit that you had no firsthand knowledge that Plaintiff Joseph Fabozzi ever made the statement described in Request for Admission No. 1.
4. Admit that during the investigation conducted by Terrance Campbell of the New Jersey Division of Child Protection and Permanency, at Waretown PD Terrance Campbell stated:

“So, whenever we get a call of child abuse and neglect we have to go out and interview the children. By interviewing the child, a child disclosed to me that she believes you touch children [redacted]. She never observed you

touch anyone. Then when later on questioned, I asked her well, how does she know? She said oh, her mommy said.”

See Exhibit 1: YouTube Video Terrance Campbell at Waretown PD:

<https://youtu.be/8caqKfCAJV0>

See Exhibit 2: Transcript Terrance Campbell at Waretown PD

5. Admit that you are the “mother” referenced in the statement made by your daughter [MINOR] to Terrance Campbell of the New Jersey Division of Child Protection and Permanency that her belief that Plaintiff Joseph Fabozzi touched children was based on what her mother told her.
6. Admit that you did not personally observe Plaintiff Joseph Fabozzi touch any child in a sexual manner.
7. Admit that neither your daughter [MINOR CHILD] nor your daughter [MINOR CHILD] reported to you that Plaintiff Joseph Fabozzi touched them in a sexual or inappropriate manner prior to the Hillside Elementary School reporting the accusations to the New Jersey Division of Child Protection and Permanency.
8. Admit that during the 2021–2022 school year you communicated with [MINOR] s classroom aide assigned to her pursuant to her Individualized Education Program (IEP) at Hillside Elementary School, including

communications occurring through privately owned cellular telephones or devices not monitored or controlled by the school.

9. Admit that after [MINOR] returned to your residence following a weekend visit with Plaintiff Joseph Fabozzi in approximately February or March 2022, you communicated to [MINOR] s classroom aide at Hillside Elementary School that Plaintiff Fabozzi had stated at a Sweet Sixteen party that “the girls will be so fuckable when they turn 18.”
10. Admit that the referral made by Hillside Elementary School to the New Jersey Division of Child Protection and Permanency concerning Plaintiff Joseph Fabozzi originated from statements your daughter [MINOR] made to her classroom aide assigned pursuant to her Individualized Education Program (IEP).
11. Admit that when you first appeared at the Mount Laurel Police Department on November 3, 2022 to file a harassment complaint against Plaintiff Joseph Fabozzi, you knew that the Burlington County Sheriff had attempted to serve you on October 25 and October 26, 2022 with the summons and complaint in the civil lawsuit OCN-L-002231-22 filed by Plaintiff Joseph Fabozzi on October 5, 2022.

12. Admit that when you first appeared at the Mount Laurel Police Department on November 3, 2022 to file a harassment complaint against Plaintiff Joseph Fabozzi, you knew that process server Dana Judge had attempted to serve you on November 1 and November 2, 2022 with the summons and complaint in the civil lawsuit OCN-L-002231-22 filed by Plaintiff Joseph Fabozzi on October 5, 2022.

13. Admit that when you first appeared at the Mount Laurel Police Department on November 3, 2022 to file a harassment complaint against Plaintiff Joseph Fabozzi, you knew that on November 2, 2022 at approximately 7:52 p.m., while your gray Scion xB with NJ tag E34NJA was parked directly outside your apartment, calls to the call box at your residence were answered and immediately disconnected when process server Dana Judge attempted to serve you with the summons and complaint in civil lawsuit OCN-L-002231-22 filed by Plaintiff Joseph Fabozzi.

14. Admit that on November 2, 2022 you were aware that process server Dana Judge attempted to contact you through the call box at your apartment building and that you did not come downstairs to accept service of the summons and complaint in the civil lawsuit OCN-L-002231-22 filed by Plaintiff Joseph Fabozzi.

See Exhibit 4: Dana Judge Attempt 1

See Exhibit 5: Dana Judge Attempt 2

See Exhibit 6: Chat Dana Judge

15. Admit that when you initially went to the Mount Laurel Police Department on November 3, 2022 at approximately 11:16 a.m. to file a harassment complaint against Plaintiff Joseph Fabozzi, you were aware that Plaintiff Fabozzi had filed the civil lawsuit OCN-L-002231-22 against you.

See Exhibit 7: PTO Email 1

See Exhibit 8: PTO Email 2

16. Admit that when you first appeared at the Mount Laurel Police Department on November 3, 2022 at approximately 11:16 a.m. to file a harassment complaint against Plaintiff Joseph Fabozzi, you did not inform Officer Justin Turino that Plaintiff Fabozzi had filed the civil lawsuit OCN-L-002231-22 against you.

17. Admit that on November 3, 2022 Plaintiff Joseph Fabozzi sent two emails from the address [EMAIL REDACTED] to the email address [EMAIL REDACTED] stating that you were avoiding service of the summons and complaint in civil lawsuit OCN-L-002231-22.

See Exhibits 7 and 8

18. Admit that on November 3, 2022 the emails sent by Plaintiff Joseph Fabozzi referenced his attempts to serve you with the summons and complaint in civil lawsuit OCN-L-002231-22 and asked that you contact the Burlington County Sheriff's Office to accept service.

See Exhibits 7 and 8

19. Admit that on November 3, 2022 you signed a handwritten statement and affidavit of probable cause concerning Plaintiff Joseph Fabozzi stating:

“On 11/3/2022, received email in AM from Joseph Fabozzi and was notified by colleagues in Hillside Elementary PTO that they were all receiving emails from him again. Went to Mount Laurel Police to try to file a complaint and they notified him to stop. After that he still continued to send emails.”

See Exhibit 9 Olland's Handwritten Statement

See Exhibit 10 Olland's Affidavit of Probable Cause

20. Admit that during the harassment trial held on September 13, 2023 you testified that you had never received the November 3, 2022 emails from Plaintiff Joseph Fabozzi.

See Exhibit 11 Olland Cross No Email

See Exhibit 12 Olland Direct No Email

See Exhibit 13 Harassment Trial Transcript

21. Admit that prior to your testimony at the harassment trial held on September 13, 2023 you reviewed with Prosecutor Matthew Weng the November 3, 2022 email sent by Plaintiff Joseph Fabozzi to [REDACTED]

See Exhibits 7 and 8

22. Admit that on November 3, 2022 you signed a handwritten statement and affidavit of probable cause concerning Plaintiff Joseph Fabozzi stating:

“On 04/06/2022, posted copies of the DCF memo concerning allegations of child abuse.”

See Exhibit 9 Hand Written Statement

See Exhibit 10 Affidavit of Probable Cause

23. Admit that prior to the harassment trial held on September 13, 2023 you provided Prosecutor Matthew Weng with a copy of the April 6, 2022 social media post referenced in your November 3, 2022 handwritten statement and affidavit of probable cause.

See Exhibits 9 and 10

24. Admit that during the harassment trial held on September 13, 2023 you heard Prosecutor Matthew Weng argue to the Court that none of Plaintiff Fabozzi's social media posts contained the DCF letter stating the allegations were unfounded, and that you did not inform the Court that Plaintiff Fabozzi had previously posted that letter.

See Exhibit 14 Weng Recross Fabozzi

See Exhibit 15 Weng Recross Fabozzi

See Exhibit 16 Weng Closing Argument

25. Admit that after leaving the Mount Laurel Police Department following your first visit on November 3, 2022 at approximately 11:16 a.m., and before returning to the Mount Laurel Police Department at approximately 12:54 p.m., you spoke with Officer Justin Turino concerning Plaintiff Joseph Fabozzi.

