
**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – CIVIL PART
BURLINGTON COUNTY**

JOSEPH FABOZZI,

Plaintiff,

v.

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

Defendants.

Docket No.: BUR-L-2334-25

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT OFFICER SEAN PINKERY**

TO:

Timothy R. Bieg, Esquire ID 024112005

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Attorneys for Defendant Officer Sean Pinkery

APPLICABLE RULE OF COURT

Pursuant to Rule 4:18 of the New Jersey Rules of Court, Plaintiff requests that Defendant Officer Sean Pinkery produce the following documents, electronically stored information, and tangible things within the time prescribed by the Rules of Court.

INSTRUCTIONS

1. These Requests are continuing in nature. If additional responsive documents are later located, they shall be produced promptly.

2. Produce each document in its original form, including all attachments and electronically stored metadata to the extent maintained.
3. If any responsive document has been lost, destroyed, or is no longer in your possession, identify the document, state when it was lost or destroyed, and explain the circumstances.
4. If any document is withheld based upon a claim of privilege, produce a privilege log identifying:
 - a. Date
 - b. Author
 - c. Every recipient
 - d. General subject matter
 - e. Type of document
 - f. Privilege asserted
 - g. Factual basis for the privilege.

DEFINITIONS

1. "Plaintiff" means Joseph Fabozzi.
2. "Defendant" means Officer Sean Pinkery.
3. "Township" means the Township of Mount Laurel, together with its departments, agencies, boards, commissions, officers, employees, attorneys, agents, and representatives.
4. "Mount Laurel Police Department" or "MLPD" means the Mount Laurel Police Department.
5. "Criminal Discovery" means every document, electronically stored information, report, supplemental report, narrative, CAD report, audio recording, video recording, body-worn camera recording, photograph, statement, dispatch record, email, memorandum, and every other item of information produced, maintained, or subject to production in connection with the events that are the subject of these Requests for Production.
6. "Document," "Communication," and "Identify" shall be construed broadly and consistently with the New Jersey Rules of Court.
7. **"You were at a Sweet 16 party, correct?"** means the following statement made by DCP&P Investigator Terrance Campbell during his March 2, 2022 interview of Plaintiff, as reflected in Exhibit 2, entitled **"March 2, 2022, 12:40 p.m. – Transcript of Interview at Waretown Police Department,"** at Page 4, Lines 23-25, and Page 5, Lines 1-12:

Page 4

- 23. MR. FABOZZI: -- she made a false allegation
- 24. against me.
- 25. MR. CAMPBELL: This is an investigation.

Page 5

- 1. She did make a false allegation. This is what
- 2. happened. She overheard her mother have an adult
- 3. conversation where you stated -- you were at a Sweet 16
- 4. party, correct?
- 5. MR. FABOZZI: No, because I was not at the
- 6. Captain's Inn.
- 7. MR. CAMPBELL: Okay. They're saying you were
- 8. at a Sweet 16 party and you made mention that
- 9. "the girls will be so fuckable when they turn 18."
- 10. MR. FABOZZI: That is not true because I
- 11. wasn't at that party at the Captain's Inn because I
- 12. don't like spending money.

8. "She said, oh, her mommy stated it," means the following statement made by DCP&P Investigator Terrance Campbell during his March 2, 2022 interview of Plaintiff, as reflected in Exhibit 2, entitled "**March 2, 2022, 12:40 p.m. – Transcript of Interview at Waretown Police Department,**" at Page 4, Lines 1-11:

Page 4, Lines 1-11

- 1. MR. CAMPBELL: So whenever we get a call of
- 2. child abuse or neglect, we have to go out and interview
- 3. the children. When interviewing the child, the child
- 4. disclosed to me that she believes you touches (sic)
- 5. children, (interference), she never observed you touch
- 6. anyone.

7. Then when later on questioned, I ask her,
 8. well, how does she know. She said, oh, her mommy
 9. stated it. So, I still have to ask you because
 10. (interference), so that's why I'm asking you, have you
 11. ever had any type of contact (interference)?
-

REQUEST FOR PRODUCTION NO. 1

Produce every report, supplemental report, memorandum, note, or other document you prepared concerning Plaintiff on or about March 3, 2022.

REQUEST FOR PRODUCTION NO. 2

Produce every body-worn camera recording, dash camera recording, audio recording, video recording, photograph, or other electronic recording concerning Plaintiff on March 3, 2022.

REQUEST FOR PRODUCTION NO. 3

Produce every CAD report, dispatch record, incident report, call log, or event history concerning Plaintiff on March 3, 2022.

REQUEST FOR PRODUCTION NO. 4

Produce every document reflecting Plaintiff's request to file a citizen's complaint on March 3, 2022.

REQUEST FOR PRODUCTION NO. 5

Produce every document concerning your decision to decline Plaintiff's request to file a citizen's complaint.

REQUEST FOR PRODUCTION NO. 6

Produce every communication between you and any member of the Mount Laurel Police Department concerning Plaintiff from March 3, 2022 through March 31, 2022.

REQUEST FOR PRODUCTION NO. 7

Produce every communication between you and Defendant Jennifer Olland concerning Plaintiff.

REQUEST FOR PRODUCTION NO. 8

Produce every communication between you and any employee or representative of the Department of Children and Families concerning Plaintiff.

REQUEST FOR PRODUCTION NO. 9

Produce every communication between you and the Ocean Township Police Department concerning Plaintiff.

REQUEST FOR PRODUCTION NO. 10

Produce every communication between you and DCP&P Investigator Terrance Campbell concerning Plaintiff.

REQUEST FOR PRODUCTION NO. 11

Produce every document you reviewed before deciding to decline Plaintiff's request to file a citizen's complaint.

REQUEST FOR PRODUCTION NO. 12

Produce every policy, directive, general order, standard operating procedure, training bulletin, or other document governing the acceptance, investigation, referral, or rejection of citizen complaints that was in effect on March 3, 2022.

REQUEST FOR PRODUCTION NO. 13

Produce every document concerning the allegation that Defendant Jennifer Olland coached her daughters to make false allegations of child abuse against Plaintiff.

REQUEST FOR PRODUCTION NO. 14

Produce every document, report, email, memorandum, note, text message, recording, body-worn camera recording, CAD entry, investigative file, internal communication, or other record in the possession, custody, or control of the Mount Laurel Police Department that you reviewed, relied upon, considered, or received in connection with your investigation concerning whether Defendant Jennifer Olland communicated allegations concerning Plaintiff to personnel employed by the Mount Laurel Board of Education before DCP&P Investigator Terrance Campbell received the complaint he reported having received on February 4, 2022. See Exhibit 3. If no such investigation was conducted, produce every document reflecting that no such investigation was undertaken or explaining why no such investigation was conducted.

REQUEST FOR PRODUCTION NO. 15

Produce every document concerning DCP&P Investigator Terrance Campbell's statement, "She said, oh, her mommy stated it."

REQUEST FOR PRODUCTION NO. 16

Produce every document concerning DCP&P Investigator Terrance Campbell's statement, "You were at a Sweet 16 party, correct?"

REQUEST FOR PRODUCTION NO. 17

Produce every document identifying the reasons Plaintiff was directed to report the matter to the Manahawkin Police Department instead of the Mount Laurel Police Department.

REQUEST FOR PRODUCTION NO. 18

Produce every document concerning Plaintiff's allegation that the false allegations of child abuse originated at Hillside Elementary School and were later reported to the Mount Laurel Police Department and the Department of Children and Families.

REQUEST FOR PRODUCTION NO. 19

Produce every email, text message, memorandum, note, or other communication reflecting your knowledge that DCP&P Investigator Terrance Campbell concluded the alleged complaint did not occur.

REQUEST FOR PRODUCTION NO. 20

Produce every email, text message, memorandum, note, or other communication reflecting your knowledge that DCP&P Investigator Terrance Campbell concluded the matter was no longer a criminal investigation.

REQUEST FOR PRODUCTION NO. 21

Produce every document identifying every investigative step you took in response to Plaintiff's allegations on March 3, 2022.

REQUEST FOR PRODUCTION NO. 22

Produce every document reflecting any investigation into whether Defendant Jennifer Olland made false allegations of child abuse against Plaintiff.

REQUEST FOR PRODUCTION NO. 23

Produce every document, communication, memorandum, report, email, note, or recording referring or relating to the March 2, 2022 interview conducted by DCP&P Investigator Terrance Campbell at the Waretown Police Department.

REQUEST FOR PRODUCTION NO. 24

Produce every document you contend contradicts Plaintiff's contention that Defendant Jennifer Olland made false allegations of child abuse against him.

REQUEST FOR PRODUCTION NO. 25

Produce every document identified, reviewed, relied upon, or referred to in answering Plaintiff's Requests for Admission and Interrogatories served upon Defendant Officer Sean Pinkery.

WHEREFORE, Plaintiff respectfully requests that Defendant Officer Sean Pinkery produce each of the foregoing documents, electronically stored information, and tangible things separately and fully, within the time prescribed by Rule 4:18 of the New Jersey Rules of Court, after making a reasonable inquiry, and timely supplement any production if additional responsive materials are later discovered or become available.

Respectfully submitted,

JOSEPH FABOZZI

Plaintiff, Pro Se

[REDACTED]

Telephone:

Email:

[REDACTED]

Dated: _____