

**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 SET OF REQUESTS FOR ADMISSION TO DEFENDANT
OFFICER SEAN PINKERY**

TO:

Timothy R. Bieg, Esquire ID 024112005

MADDEN & MADDEN, P.A.

trb@maddenmadden.com

Jennifer A. Hart, Legal Assistant to

Michael P. Madden, Esquire and

Timothy R. Bieg, Esquire

jenh@maddenmadden.com

108 Kings Highway East – Suite 200

P.O. Box 210

Haddonfield, New Jersey 08033

(856) 428-9520

Attorneys for Defendant Officer Sean Pinkery

APPLICABLE RULE OF COURT

Pursuant to Rule 4:22-1 of the New Jersey Rules of Court, the responding party's answers to these Requests for Admission must comply with the following requirements:

The answer shall specifically deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested admission, and when good faith requires that a party qualify the answer or deny only a part of the matter of which an admission is requested, the party shall specify so much of it as is true and qualify or deny the remainder.

The party who has requested the admissions may move to determine the sufficiency of the answers or objections. Unless the court determines that an objection is justified, it shall order that an answer be served. If the court determines that an answer does not comply with the requirements of this rule, it may order either that the matter is admitted or that an amended answer be served.

INSTRUCTIONS

1. These Requests for Admission are served pursuant to Rule 4:22 of the New Jersey Rules of Court.
2. Each Request shall be separately admitted or denied. If Defendant cannot truthfully admit or deny the entire Request, Defendant shall admit the portion that is true and deny or qualify the remainder.
3. If Defendant lacks sufficient knowledge or information to admit or deny a Request, Defendant shall state that a reasonable inquiry has been made and that the information known or readily obtainable is insufficient to enable Defendant to admit or deny the Request.
4. If Defendant objects to any Request, the specific factual and legal basis for the objection shall be stated.
5. These Requests are continuing in nature. If Defendant obtains additional information after serving responses that renders any response incomplete or incorrect, Defendant shall timely supplement the response in accordance with the New Jersey Rules of Court.

PRIVILEGE LOG INSTRUCTION

If Defendant withholds any document, electronically stored information, or communication responsive to any Request for Admission, Interrogatory, or Request for Production on the basis of attorney-client privilege, work-product doctrine, or any other claimed privilege or protection, Defendant shall identify each withheld item in a privilege log. For each withheld item, state:

- a. The date;
- b. The author or sender;
- c. Every recipient, including any person copied;
- d. The general subject matter of the document or communication, without revealing the privileged information itself;
- e. The type of document or communication (such as email, memorandum, letter, text message, or note);
- f. The specific privilege or protection claimed; and

g. The factual basis for the claim of privilege or protection sufficient to permit Plaintiff and the Court to assess the claim.

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 Admission.
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:**

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23. **MR. FABOZZI:** -- she made a false allegation

24. against me.

25. **MR. CAMPBELL:** This is an investigation.

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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)?

I. AUTHENTICATION OF INCIDENT REPORT

Request for Admission No. 1:

Admit that the document attached as Exhibit 1 is a true and accurate copy of the Incident Supplement Report you prepared concerning Incident No. 2022-00006545, dated March 3, 2022. See Exhibit 1.

Request for Admission No. 2:

Admit that you prepared the Incident Supplement Report attached as Exhibit 1 in your capacity as a police officer employed by the Mount Laurel Police Department. See Exhibit 1.

Request for Admission No. 3:

Admit that the statements contained in the Incident Supplement Report attached as Exhibit 1 accurately reflect the information you intended to record on March 3, 2022. See Exhibit 1.

II. MATERIAL OMISSIONS FROM THE INCIDENT REPORT

Request for Admission No. 4:

Admit that Exhibit 1 does not state that Plaintiff told you Defendant Jennifer Olland coached her daughters to make false allegations of child abuse against him at Hillside Elementary School, located at 1370 Hainesport Road, Mount Laurel, New Jersey. See Exhibit 1.

Request for Admission No. 5:

Admit that Exhibit 1 does not state that Plaintiff told you the false allegations of child abuse started at Hillside Elementary School and were later reported to the Mount Laurel Police Department and the Department of Children and Families. See Exhibit 1.

Request for Admission No. 6:

Admit that Exhibit 1 does not state that Plaintiff told you DCP&P Investigator Terrance Campbell made the statement, "**She said, oh, her mommy stated it,**" as defined herein. See Exhibits 1 and 2.

Request for Admission No. 7:

Admit that Exhibit 1 does not state that Plaintiff told you DCP&P Investigator Terrance Campbell made the statement, "**You were at a Sweet 16 party, correct?**" as defined herein. See Exhibits 1 and 2.

III. INFORMATION PLAINTIFF REPORTED TO DEFENDANT PINKERY

Request for Admission No. 8:

Admit that, during your March 3, 2022 interview, Plaintiff told you he never made the statement that "the girls will be so fuckable when they turn 18." See Exhibits 1 and 2.

Request for Admission No. 9:

Admit that, during your March 3, 2022 interview, Plaintiff told you he did not attend the Sweet Sixteen party. See Exhibits 1 and 2.

Request for Admission No. 10:

Admit that, during your March 3, 2022 interview, Plaintiff told you that Defendant Jennifer Olland did not attend the Sweet Sixteen party. See Exhibits 1 and 2.

Request for Admission No. 11:

Admit that, during your March 3, 2022 interview, Plaintiff told you that he believed Defendant Jennifer Olland assumed Plaintiff attended the Sweet Sixteen party because her former boyfriend, Joseph Dunnkosky, attended the party. See Exhibits 1 and 2.

Request for Admission No. 12:

Admit that, during your March 3, 2022 interview, Plaintiff told you that he believed Defendant Jennifer Olland made false allegations of child abuse to Hillside Elementary School because she was trying to gain an advantage in a custody dispute with her former boyfriend, Joseph Dunnkosky. See Exhibits 1 and 2.

IV. DEFENDANT PINKERY'S RESPONSE

Request for Admission No. 13:

Admit that, on March 3, 2022, you had the authority to accept or reject Plaintiff's request to file a citizen's complaint. See Exhibit 1.

Request for Admission No. 14:

Admit that you declined Plaintiff's request to file a citizen's complaint on March 3, 2022. See Exhibit 1.

Request for Admission No. 15:

Admit that, instead of accepting Plaintiff's citizen's complaint, you directed Plaintiff to report the matter to the Manahawkin Police Department. See Exhibit 1.

Request for Admission No. 16:

Admit that Plaintiff told you the alleged false accusations originated in Mount Laurel, New Jersey, and that you nevertheless directed Plaintiff to the Manahawkin Police Department.

V. INVESTIGATIVE SIGNIFICANCE

Request for Admission No. 17:

Admit that the statement attributed to the child by DCP&P Investigator Terrance Campbell, "She said, oh, her mommy stated it," as defined herein, indicated that the child's belief about Plaintiff came from statements made by her mother, Defendant Jennifer Olland, rather than from the child's own observations. See Exhibit 2.

Request for Admission No. 18:

Admit that, after Plaintiff told you DCP&P Investigator Terrance Campbell made the statement, "She said, oh, her mommy stated it," as defined herein, you did not investigate whether Defendant Jennifer Olland made false statements concerning Plaintiff.

Request for Admission No. 19:

Admit that the statement made by DCP&P Investigator Terrance Campbell, "You were at a Sweet 16 party, correct?" as defined herein, indicated that the allegation concerning Plaintiff was based on what the child allegedly overheard from a conversation Defendant Jennifer Olland was having, rather than on the child's own observations. See Exhibit 2.

Request for Admission No. 20:

Admit that, after Plaintiff told you DCP&P Investigator Terrance Campbell made the statement, "You were at a Sweet 16 party, correct?," as defined herein, you did not investigate whether Defendant Jennifer Olland made false statements concerning Plaintiff.

Request for Admission No. 21:

Admit that you did not investigate 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 and Exhibits 5 through 8.

Request for Admission No. 22:

Admit that your decision to decline Plaintiff's request to file a citizen's complaint on or about March 3, 2022 was your own decision, and that no supervisor, officer, employee, attorney, or

representative of the Mount Laurel Police Department or the Township of Mount Laurel instructed, directed, or ordered you to decline Plaintiff's request to file a citizen's complaint on March 3, 2022.

Request for Admission No. 23:

Admit that you did not contact DCP&P Investigator Terrance Campbell before declining Plaintiff's request to file a citizen's complaint.

Request for Admission No. 24:

Admit that you did not contact the Ocean Township Police Department before declining Plaintiff's request to file a citizen's complaint.

Request for Admission No. 25

Admit that, before declining Plaintiff's request to file a citizen's complaint, you did not interview Defendant Jennifer Olland.

WHEREFORE, Plaintiff respectfully requests that Defendant Officer Sean Pinkery admit or deny each of the foregoing Requests for Admission separately and fully, in accordance with Rule 4:22-1 of the New Jersey Rules of Court, within the time prescribed by the Rules of Court, after making a reasonable inquiry, and timely supplement any response that is incomplete or incorrect. Respectfully submitted,

[REDACTED]

Plaintiff, Pro Se

[REDACTED]

Telephone: [REDACTED]

Email: [REDACTED]

Dated: July 19, 2026