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ATTORNEY FOR DEFENDANTS, POLICE CHIEF TIMOTHY HUDNALL, POLICE OFFICER SEAN PINKERY, POLICE OFFICER JACOB HEIN, POLICE OFFICER DAVID SWEELY, POLICE OFFICER, JUSTIN TURINO, POLICE OFFICE AARON DiPERI, RECORDS CLERK ASHLEY SMITH, RECORDS CLERK LORI RULON, COUNCILWOMAN FOZIA JANJUA, PROSECUTOR MATTHEW WENG. COURT ADMINISTRATOR ALLISON GASIOROWSKI and OFFICER MICHAEL CRESONG

JOSEPH FABOZZI

PLAINTIFF(S),

VS.

JENNIFER OLLAND, TOWNSHIP
OF MOUNT LAUREL, OFFICER
SEAN PINKERY BADGE #182,
OFFICER JACOB HEIN BADGE #
193, OFFICER DAVID SWEELY,
OFFICER JUSTIN TURINO,
OFFICER TIMOTHY HUDNALL,
PROSECUTOR MATTHEW WENG,
ASHLEY SMITH, LORI RULON,
OFFICER AARON DiPERI, GOERGE
MORRIS, J. BROOKS DiDONATO,
ERIC GARCIA, MAYOR FONZA
JANJUA , COURT
ADMINISTRATOR ALLISON
GASIOROWSKI and OFFICER
MICHAEL CRESONG

DEFENDANT(S),

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY
LAW DIVISION

DOCKET NO: BUR-L-2334-25

CIVIL ACTION

**DEFENDANT, OFFICER SEAN
PRINKEY'S RESPONSE TO
PLAINTIFF'S REQUEST FOR
ADMISSIONS**

TO: Joseph Fabozzi



GENERAL OBJECTIONS

A. Defendant objects to these requests to the extent they seek information protected by the attorney-client privilege, the attorney work product privilege, the investigative privilege, documents and information obtained by counsel in anticipation of or after the filing of this lawsuit, and all other applicable privileges.

B. Defendant objects to these requests (including the definitions and instructions) to the extent that they seek to impose obligations upon this Defendant beyond those imposed by the New Jersey Rules of Court.

C. Defendant objects to these requests to the extent they purport to require defendant to furnish information or produce documents that are not within defendant's possession, custody or control.

D. Defendant objects to these requests to the extent it requires defendant to confirm what is in written documents, including emails.

Each of the foregoing General Objections is applicable to and hereby is incorporated into each and every response, and any response by Defendant to the requests is made without waiving any of the General Objections made herein. Furthermore, discovery is continuing, and defendant reserves the right to supplement, alter or limit its responses.

RESPONSES TO PLAINTIFF'S REQUEST FOR ADMISSIONS

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.

RESPONSE: It is admitted that Exhibit 1 appears to be the report prepared by the Answering Defendant.

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.

RESPONSE: Admitted.

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.

RESPONSE: The referenced Incident Supplemental Report is a written document, the contents of which speak for itself.

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.

RESPONSE: The referenced Incident/Supplemental Report is a written document, the contents of which speak for itself.

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.

RESPONSE: The referenced Incident/Supplemental Report is a written document, the contents of which speak for itself.

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.

RESPONSE: The referenced Incident/Supplemental Report is a written document, the contents of which speak for itself.

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.

RESPONSE: The referenced Incident/Supplemental Report is a written document, the contents of which speak for itself.

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.

RESPONSE: This Answering Defendant can neither admit nor deny the allegations of this paragraph as he has no recollection of the alleged statement.

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.

RESPONSE: This Answering Defendant can neither admit nor deny the allegations of this paragraph as he has no recollection of the alleged statement.

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.

RESPONSE: This Answering Defendant can neither admit nor deny the allegations of this paragraph as he has no recollection of the alleged statement.

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.

RESPONSE: This Answering Defendant can neither admit nor deny the allegations of this paragraph as he has no recollection of the alleged statement.

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.

RESPONSE: This Answering Defendant can neither admit nor deny the allegations of this paragraph as he has no recollection of the alleged statement.

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.

RESPONSE: Admitted.

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.

RESPONSE: Denied. At the time, Plaintiff was advised that a Complaint should be filed with the Manahawkin Police Department.

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.

RESPONSE: Please see response to Request number 14.

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.

RESPONSE: Denied. Based on the contents of the March 3, 2022 report, "Mr. Fabozzi stated the incident occurred in Manahawkin, New Jersey".

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.

RESPONSE: Objection. This request is overly broad, unduly burdensome and seeks information not within this Answering Defendant's custody or control. By way of further response, this Answering Defendant can neither admit nor deny the allegations of this paragraph as he does not recall any such statement.

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.

RESPONSE: Objection. This request is overly broad, unduly burdensome and seeks information not within this Answering Defendant's custody or control. By way of further response, this Answering Defendant can neither admit nor deny the allegations of this paragraph as he does not recall any such statement.

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.

RESPONSE: Objection. This request is overly broad, unduly burdensome and seeks information not within this Answering Defendant's custody or control. By way of further response, this Answering Defendant can neither admit nor deny the allegations of this paragraph as he does not recall any such statement.

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.

RESPONSE: Objection. This request is overly broad, unduly burdensome and seeks information not within this Answering Defendant's custody or control. By way of

further response, this Answering Defendant can neither admit nor deny the allegations of this paragraph as he does not recall any such statement.

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.

RESPONSE: Admitted.

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.

RESPONSE: Admitted.

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.

RESPONSE: Admitted.

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.

RESPONSE: Admitted.

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.

RESPONSE: Admitted.

MADDEN & MADDEN

s/ Timothy R. Bieg

Timothy R. Bieg, Esquire

Dated: August 11, 2026