

**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 REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT MATTHEW WENG**

Pursuant to **Rule 4:18 of the New Jersey Rules of Court**, Plaintiff Joseph Fabozzi requests that Defendant Matthew Weng produce the documents and electronically stored information described below within the time prescribed by the New Jersey Rules of Court.

INSTRUCTIONS

1. Produce all documents and electronically stored information responsive to each request that are in your possession, custody, or control.
2. If any requested document has been lost, destroyed, discarded, or is otherwise unavailable, identify the document, describe its contents, state the reason it is unavailable, and identify the person(s) with knowledge of its disposition.
3. If you withhold any document or portion of a document based upon a claim of privilege, immunity, work-product protection, or any other basis, identify the document and state the specific grounds for withholding it.
4. If a request cannot be answered in full, produce all responsive documents that are available and identify the portion of the request to which production is withheld.
5. Documents shall be produced as they are kept in the ordinary course of business or organized and labeled to correspond with the individual request to which they are responsive.

6. These Requests are continuing in nature. If additional responsive documents become available after your response is served, you are requested to supplement your production in accordance with the New Jersey Rules of Court.
-

DEFINITIONS

1. **"You," "Your," "Defendant," or "Weng"** means Defendant **Matthew Weng**, individually and in his capacity as Municipal Prosecutor for the Township of Mount Laurel, including anyone acting on his behalf.
 2. **"Plaintiff"** means Joseph Fabozzi.
 3. **"Jennifer Olland" or "Olland"** means Defendant Jennifer Olland.
 4. **"Officer Turino"** means Defendant Justin Turino.
 5. **"Harassment Trial"** means the September 13, 2023 trial conducted in the Mount Laurel Municipal Court concerning the harassment complaint filed by Jennifer Olland against Plaintiff.
 6. **"Citizen Complaint"** means Jennifer Olland's November 3, 2022 citizen complaint submitted to the Mount Laurel Police Department that resulted in the harassment charge against Plaintiff.
 7. **"Document"** means every written, printed, typed, recorded, electronically stored, or graphic matter of any kind, including emails, text messages, correspondence, notes, memoranda, reports, photographs, audio recordings, video recordings, calendars, drafts, handwritten notes, electronically stored information, metadata, and social media communications.
 8. **"Electronically Stored Information" ("ESI")** includes emails, text messages, electronic documents, word processing files, spreadsheets, PDFs, databases, voicemail, electronic calendars, photographs, videos, metadata, and any information stored on computers, servers, cloud storage, mobile devices, or other electronic media.
 9. **"Communication"** means every oral, written, electronic, or other exchange of information, including conversations, meetings, telephone calls, emails, text messages, letters, memoranda, and electronic messages.
 10. **"Identify,"** when referring to a document, means to state its title, date, author, recipient(s), present custodian, and present location if it is not produced.
-

REQUEST FOR PRODUCTION NO. 1

Produce every document, exhibit, affidavit, police report, memorandum, note, email, communication, transcript, electronic record, or other material that you reviewed, received, relied upon, or considered in preparation for the September 13, 2023 harassment trial, including but not limited to Jennifer Olland's written statement and the Affidavit of Probable Cause.

REQUEST FOR PRODUCTION NO. 2

Produce every document, communication, email, memorandum, note, exhibit, police report, transcript, affidavit, electronic record, or other material that you reviewed, received, relied upon, or considered concerning Plaintiff Joseph Fabozzi's November 3, 2022 emails to Jennifer Olland and the Mount Laurel PTO identified as Exhibits 4 and 5 before or during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 3

Produce every document, communication, email, memorandum, note, exhibit, transcript, police report, affidavit, electronic record, or other material that you reviewed, received, relied upon, or considered concerning Jennifer Olland's testimony during the September 13, 2023 harassment trial that she had never received emails from Plaintiff Joseph Fabozzi.

REQUEST FOR PRODUCTION NO. 4

Produce every document, exhibit, communication, memorandum, note, transcript, email, police report, affidavit, electronic record, or other material that you reviewed, received, relied upon, or considered concerning the exhibits introduced into evidence during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 5

Produce every document, exhibit, communication, memorandum, note, transcript, police report, affidavit, electronic record, or other material that you reviewed, received, relied upon, or considered in arguing during the September 13, 2023 harassment trial that Plaintiff Joseph Fabozzi possessed the March 30, 2022 DCP&P letter but did not include that information in any of the social media posts at issue.

REQUEST FOR PRODUCTION NO. 6

Produce every document, communication, email, memorandum, note, or other material reflecting when or how you received the March 30, 2022 DCP&P letter identified as Exhibit 6, including any copy bearing your notes, markings, highlights, annotations, or other indications that you reviewed it.

REQUEST FOR PRODUCTION NO. 7

Produce every document, communication, email, memorandum, note, transcript, police report, affidavit, electronic record, or other material concerning the decision whether the March 30, 2022 DCP&P letter identified as Exhibit 6 would be introduced into evidence during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 8

Produce every document, communication, email, memorandum, note, calendar entry, court filing, or other material concerning Jennifer Olland's default in **OCN-L-002231-22** and the scheduling of the September 15, 2023 Proof Hearing that you reviewed, received, relied upon, or considered before or during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 9

Produce every document, communication, email, text message, memorandum, note, transcript, electronic record, calendar entry, or other material concerning Plaintiff Joseph Fabozzi's access to the audio recording, transcript, or other records of the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 10

Produce every document, communication, email, memorandum, note, police report, electronic record, or other material that supports your denial of Admission No. 10.

REQUEST FOR PRODUCTION NO. 11

Produce every document, communication, email, memorandum, policy, directive, manual, guideline, training material, statute, court rule, legal opinion, or other material that supports your denial that, in your capacity as Municipal Prosecutor, you had authority to participate in, recommend, or determine whether criminal perjury charges would be pursued against Jennifer Olland arising from her testimony during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 12

Produce every document, communication, email, memorandum, note, report, electronic record, or other material concerning the decision whether to pursue criminal perjury charges against Jennifer Olland arising from her testimony during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 13

Produce every document supporting your denial of Admission No. 13, including but not limited to every criminal complaint, accusation, summons, indictment, warrant, docket sheet, judgment, court order, police report, prosecutorial record, or other record concerning any criminal perjury charge against Jennifer Olland arising from her testimony during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 14

Produce every document, communication, email, memorandum, note, exhibit, court filing, transcript, police report, affidavit, electronic record, or other material that you reviewed, received, relied upon, or considered concerning Plaintiff Joseph Fabozzi's November 3, 2022 email to Officer Justin Turino regarding Jennifer Olland's avoidance of service in **OCN-L-002231-22** and the Motion for Alternate Service attached thereto before or during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 15

Produce every document, communication, email, memorandum, note, exhibit, court filing, transcript, police report, affidavit, electronic record, or other material that you reviewed, received, relied upon, or considered concerning process server Dana Judge's reports and records of attempted service that were incorporated into Plaintiff's Motion for Alternate Service in **OCN-L-002231-22** before or during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 16

Produce every document, communication, email, memorandum, note, police report, electronic record, or other material that you reviewed, received, relied upon, or considered concerning Plaintiff Joseph Fabozzi's November 3, 2022 email to Officer Justin Turino stating, "I believe Jennifer made a false accusation to the police today by omitting that I was trying to serve her papers can you charge her?" (See Exhibit 13)

REQUEST FOR PRODUCTION NO. 17

Produce every document, communication, email, memorandum, note, transcript, police report, affidavit, electronic record, or other material that you reviewed, received, relied upon, or considered concerning DCP&P Investigator Terrance Campbell's statement that the child stated she had never observed Plaintiff Joseph Fabozzi touch anyone and that her belief was based upon statements made by Jennifer Olland. (See Exhibit 11).

REQUEST FOR PRODUCTION NO. 18

Produce every document, communication, email, memorandum, note, police report, affidavit, court filing, transcript, electronic record, or other material that you reviewed, received, relied upon, or considered before or during the September 13, 2023 harassment trial concerning:

- Plaintiff Joseph Fabozzi's Motion for Alternate Service in OCN-L-002231-22;
- process server Dana Judge's reports and records of attempted service;
- Plaintiff Joseph Fabozzi's November 3, 2022 emails identified as Exhibits 4 and 5;
- the March 30, 2022 DCP&P determination that the child abuse allegations against Plaintiff were determined to be "Unfounded"; and

- DCP&P Investigator Terrance Campbell's statement that the child stated she had never observed Plaintiff Joseph Fabozzi touch anyone and that her belief was based upon statements made by Jennifer Olland.
-

REQUEST FOR PRODUCTION NO. 19

Produce every document, communication, email, memorandum, note, transcript, police report, affidavit, electronic record, or other material concerning the decision not to introduce the March 30, 2022 DCP&P letter identified as Exhibit 6 into evidence during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 20

Produce every document, communication, email, memorandum, note, transcript, police report, affidavit, electronic record, or other material concerning the decision not to introduce Plaintiff Joseph Fabozzi's November 3, 2022 emails identified as Exhibits 4 and 5 into evidence during the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 21

Produce every document, communication, memorandum, note, email, trial preparation material, or other record that supports or relates to your September 13, 2023 argument that Plaintiff did not post the March 30, 2022 DCP&P determination that the allegations against him were "Unfounded."

REQUEST FOR PRODUCTION NO. 22

Produce all non-privileged documents and communications identified in response to Interrogatory No. __, including emails, text messages, letters, memoranda, notes, calendar entries, and electronic communications concerning Joseph Fabozzi after September 13, 2023.

REQUEST FOR PRODUCTION NO. 23

Produce all non-privileged documents and communications relating to Plaintiff's requests, subpoenas, motions, or other efforts to obtain the transcript, audio recording, or other records of the September 13, 2023 harassment trial.

REQUEST FOR PRODUCTION NO. 24

Produce every document, communication, email, memorandum, note, or other material reflecting when or how you received Jennifer Olland's November 3, 2022 Affidavit of Probable Cause (Exhibit 2) and handwritten statement (Exhibit 1), including any copies bearing your notes, markings, highlights, or annotations.

REQUEST FOR PRODUCTION NO. 25

Produce every document, communication, email, memorandum, note, or other material reflecting when or how you received Plaintiff Joseph Fabozzi's November 3, 2022 emails identified as Exhibits 4 and 5, including any copies bearing your notes, markings, highlights, annotations, or other indications that you reviewed them.

EXHIBIT LIST

Exhibit 1 – Jennifer Olland Written Statement

Exhibit 2 – Jennifer Olland Affidavit of Probable Cause

Exhibit 3 – September 13, 2023 Harassment Trial Transcript

Exhibit 4 – November 3, 2022 PTO Email No. 1

Exhibit 5 – November 3, 2022 PTO Email No. 2

Exhibit 6 – March 30, 2022 DCP&P Letter – Unfounded Determination

Exhibit 7 – Order Scheduling Proof Hearing for September 15, 2023 (OCN-L-002231-22)

Exhibit 8 – Dana Judge Chat Communications

Exhibit 9 – Dana Judge Service Attempt No. 1

Exhibit 10 – Dana Judge Service Attempt No. 2

Exhibit 11 – Transcript of DCP&P Investigator Terrance Campbell Interview – Waretown Police Department

Exhibit 11A – Video Recording of DCP&P Investigator Terrance Campbell Interview – Waretown Police Department

Exhibit 12 – DCP&P Unfounded Determination Memorandum

Exhibit 13 – November 3, 2022 Email Chain to Officer Justin Turino

Exhibit 14 – Motion for Alternate Service (OCN-L-002231-22)

Exhibit 15 – Burlington County Sheriff Service Attempts / Jennifer Olland Avoidance of Service

Exhibit 16 – Audio Recording – Jennifer Olland / Officer Justin Turino – Mount Laurel Police Department – November 3, 2022 (11:16 a.m.)

Exhibit 16A – Transcript – Jennifer Olland / Officer Justin Turino – Mount Laurel Police Department – November 3, 2022 (11:16 a.m.)

Exhibit 17 – Audio Recording – Officer Justin Turino / Jennifer Olland – Mount Laurel Police Department – November 3, 2022 (12:54 p.m.)

Exhibit 17A – Transcript – Officer Justin Turino / Jennifer Olland – Mount Laurel Police Department – November 3, 2022 (12:54 p.m.)

Exhibit 18 – Audio Recording – Jennifer Olland / Officer Justin Turino – Mount Laurel Police Department – November 3, 2022 (1:00 p.m.)

Exhibit 18A – Transcript – Jennifer Olland / Officer Justin Turino – Mount Laurel Police Department – November 3, 2022 (1:00 p.m.)

Exhibit numbers 19 through 21 - were intentionally not used.

Exhibit 22A – Transcript – Jennifer Olland / Officer Justin Turino – Mount Laurel Police Department – November 3, 2022 (11:16 a.m.) (Complete Transcript)

Exhibit 23 – Allison Gasiorowski Audio Request

Exhibit 24 – Officer Justin Turino's Answers to Plaintiff's First Set of Interrogatories

Exhibit 25 – Defendant Matthew Weng's Responses to Plaintiff's First Request for Admissions

REQUEST FOR PRODUCTION OF DOCUMENTS

Respectfully submitted,

Dated: July 8, 2026

Joseph Fabozzi

Plaintiff, Pro Se

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

