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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, MATTHEW WENG'S
RESPONSES TO ADMISSIONS**

Defendant, Matthew Weng, ("Answering Defendant") hereby responds to Plaintiff's Request for Admissions as follows:

MADDEN & MADDEN, P.A.

s/ Timothy R. Bieg

TIMOTHY R. BIEG, ESQUIRE

Dated: July 7, 2026

1. Admit that, before or during the September 13, 2023 harassment trial, you reviewed Jennifer Olland's written statement (Exhibit 1) and affidavit of probable cause (Exhibit 2) which both state:

"On 11/3/2022, received email in AM from Joseph Fabozzi."

"On 4/6/2022, posted copies of the DCF memo concerning allegation of child abuse."

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

2. Admit that, before or during the September 13, 2023 harassment trial, you reviewed the emails identified as Exhibits 4 and 5 that were sent on November 3, 2022, by Plaintiff Joseph Fabozzi from his email address [REDACTED] to Defendant Jennifer Olland at her email address [REDACTED].

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

3. Admit that during the September 13, 2023 Harassment Trial, you did not correct or clarify Jennifer Olland's testimony that she had never received emails from Plaintiff Fabozzi. (Please see Exhibit 3 Harassment Trial Transcript.) (Please see Exhibit 1 and 2) (Exhibits 4 and 5)(Please see Exhibits 16 and 16A Olland Turino Mt Laurel PD November 3, 2022 11:16 AM)(Exhibit 17 and 17A Turino Olland at Mount Laurel PD November 3, 2022 12:54 PM)(Exhibits 18 and 18 A)

Exhibit 3 Harassment Trial Transcript:

Olland Cross Page 41 Lines 11-12

Q He didn't email you?

A No.

Olland Direct Page 23 Lines 18-23

Q All right. And what's the email address Can. You see that on there?

A Yes. [REDACTED]

Q Okay. Have you ever received emails from that email address?

A No.

Exhibit 16A Olland Turino Mt Laurel PD November 3, 2022 11:16 AM :

Page 9 Lines 21 -24

21 MS. OLLAND: I -- I got an email this

22 morning.

23 OFFICER TURINO: From him?

Page 11 Lines 7-12

6 MS. OLLAND: Okay.

7 Should I open the email
8 he sent and see if he cc'd anybody or --
9 OFFICER TURINO: No, what I'll do is I'll
10 give you my email and you can just forward that email
11 to me and then --
12 MS. OLLAND: Okay.

Exhibit 17A Turino Olland at Mount Laurel PD November 3, 2022 12:54 PM

Page 2 Lines 1-7:

1 OFFICER TURINO: -- that's all right. All
2 right, I'm going to get you -- you want to do the
3 complaint? All right.
4 MS. OLLAND: Yeah, because he sent me another
5 email like right after.
6 OFFICER TURINO: Yeah, he sent the same thing
7 to me so --

Exhibit 18A Olland Turino Mount Laurel PD November 3, 2022 1:00 PM

Page 4 Lines 20-21

20 MS. OLLAND: -- because I got that -- another
21 email. I don't know if anyone else --

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

4. Admit that the November 3, 2022 emails identified as Exhibits 4 and 5 were not introduced into evidence during the September 13, 2023 harassment trial.

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

5. Admit that, during the September 13, 2023 harassment trial, you argued that although Plaintiff possessed the March 30, 2022 DCF letter identified as (Exhibit 6) showing the allegations against him were unfounded, he did not include that information in any of the social media posts at issue. (See Harassment Trial Transcript, Page 86, Lines 10-19. Page 81 Lines 21-23, and Page 82 Lines 1-3)

Weng Argument Page 86 Lines 10-19

“And, perhaps, the greatest piece of evidence that none of this had anything to do with vindication is that Mr. Fabozzi has a piece of paper that says these allegations are unfounded, and in none of these posts did he say, hey, look, the organization, the State organization that has the experts that investigate this stuff to determine whether or not something happened said it didn’t happen. He could have posted that and nothing else and said they investigated me, and it was unfounded, and therefore, it’s all been a lie. He didn’t do any of those things.”

Fabozzi Recross Page 81 Lines 21-23

“In none of these social media posts did you post that letter from DCF that the allegations were

unfounded, did you?"

Fabozzi Recross Page 82 Line 1-3

"We've looked at all of these social media

posts, and none of them contain this letter that says the

allegations were unfounded, do they?"

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

6. Admit that, before or during the September 13, 2023 harassment trial, you reviewed the March 30, 2022 DCF letter identified as (Exhibit 6) which states:

"Current law prohibits the disclosure of this information by you or anyone except as permitted by N.J.S.A. 9:6-8.10a."

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

7. Admit that Exhibit 6 was not introduced into evidence during the September 13, 2023 harassment trial.

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

8. Admit that, before or during the September 13, 2023 Harassment Trial, you knew that Jennifer Olland had been found in default in OCN-L-002231-22, Fabozzi v. Olland, and that a Proof Hearing had been scheduled for September 15, 2023. (See Exhibit 7.)

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

9. Admit that, after September 13, 2023, you had no involvement in any effort concerning Plaintiff Joseph Fabozzi's access to the audio recording, transcript, or other records of the September 13, 2023 Harassment Trial.

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant has not recollection of any effort to access the items identified.

10. Admit that, after the September 13, 2023 Harassment Trial, you became aware that Plaintiff Joseph Fabozzi had informed the Mount Laurel Police Department that he believed Jennifer Olland committed perjury during that trial.

RESPONSE: Denied

11. Admit 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 at the September 13, 2023 Harassment Trial.

RESPONSE: Denied

12. Admit that you were involved in, approved, or ratified the decision not to pursue criminal perjury charges against Jennifer Olland arising from her testimony at the September 13, 2023 Harassment Trial.

RESPONSE: Denied

13. Admit that Jennifer Olland was not criminally charged with perjury in connection with her testimony at the September 13, 2023 Harassment Trial.

RESPONSE: Denied

14. Admit that, prior to the September 13, 2023 Harassment Trial, you reviewed Plaintiff's November 3, 2022 email to Officer Turino concerning Jennifer Olland's avoidance of service in OCN-L-002231-22 (Exhibit 13) and the Motion for Alternate Service attached to that email (Exhibit 14).

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

15. Admit that, prior to the September 13, 2023 Harassment Trial, you reviewed 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. (See Exhibits 8, 9, 10, and 14.)

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

16. Admit that, prior to the September 13, 2023 Harassment Trial, you reviewed process server Dana Judge's reports stating that Jennifer Olland did not answer the call box, appeared to hang up on attempts to contact her, and appeared to be avoiding service. (See Exhibits 8, 9, 10, and 14.)

"She's definitely avoiding" - (Exhibits 8 at 11/1/2022 7:31 PM)

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

17. Admit that prior to the September 13, 2023 harassment trial, you were aware that Plaintiff had alleged Jennifer Olland was intentionally avoiding service of the civil complaint he filed against her in Ocean County.

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

18. Admit that prior to the September 13, 2023 harassment trial, you were aware that Plaintiff had alleged Jennifer Olland's harassment complaint was filed in retaliation for the civil action OCN-L-002231-22.

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

19. Admit that prior to the September 13, 2023 harassment trial, you were aware that Plaintiff Joseph Fabozzi contended Jennifer Olland provided false information to law enforcement in connection with the harassment complaint. (Please see Exhibit 13, Thu 11/3/2022 12:30 PM)

“Also I believe Jennifer made a false accusation to the police today by omitting that I was trying to sever her papers can you charge her?”

RESPONSE: Denied.

20. Admit that, prior to the September 13, 2023 Harassment Trial, you were aware that DCP&P Investigator Terrance Campbell documented that the child stated she had never observed Plaintiff Joseph Fabozzi touch anyone and that the child’s belief was based on statements made by her mother, Jennifer Olland. (See Exhibits 11 and 11A.)

"The child disclosed to me that she believed you touch children. 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 Exhibits 11 and 11A.)

RESPONSE: Objection. This request is overly broad and unduly burdensome. The Answering Defendant does not recall what he reviewed in preparation for the harassment trial, what was introduced as exhibits, nor the questions posed to witnesses.

21. Admit that the probable-cause judge who reviewed Jennifer Olland's November 3, 2022 citizen complaint was not provided with Plaintiff Joseph Fabozzi's Motion for Alternate Service in OCN-L-002231-22 (Exhibit 14).

RESPONSE: Objection. This request is overly broad and unduly burdensome. By way of further response, Defendant cannot admit or deny the allegation of this

paragraph insofar as it seeks information regarding whether another individual was provided or reviewed. As such, this Answering Defendant does not have personal knowledge of and cannot testify to those matters.

22. Admit that the probable-cause judge who reviewed Jennifer Olland's November 3, 2022 citizen complaint was not provided with the process server Dana Judge's reports concerning Jennifer Olland's avoidance of service (Exhibits 8, 9, 10).

RESPONSE: Objection. This request is overly broad and unduly burdensome. By way of further response, Defendant cannot admit or deny the allegation of this paragraph insofar as it seeks information regarding what another individual was provided or reviewed. As such, this Answering Defendant does not have personal knowledge of and cannot testify to those matters.

23. Admit that the probable-cause judge who reviewed Jennifer Olland's November 3, 2022 citizen complaint was not provided with the actual text of the November 3, 2022 emails that formed the basis of Jennifer Olland's harassment complaint (Exhibit 4 and 5).

RESPONSE: Objection. This request is overly broad and unduly burdensome. By way of further response, Defendant cannot admit or deny the allegation of this paragraph insofar as it seeks information regarding what another individual was provided or reviewed. As such, this Answering Defendant does not have personal knowledge of and cannot testify to those matters.

24. Admit that the probable-cause judge who reviewed Jennifer Olland's November 3, 2022 citizen complaint was not provided with the March 30, 2022 DCP&P determination that the child abuse allegations against Plaintiff Joseph Fabozzi were determined to be "Unfounded." (See Exhibit 6.)

RESPONSE: Objection. This request is overly broad and unduly burdensome. By way of further response, Defendant cannot admit or deny the allegation of this paragraph insofar as it seeks information regarding what another individual was

provided or reviewed. As such, this Answering Defendant does not have personal knowledge of and cannot testify to those matters.

25. Admit that the probable-cause judge who reviewed Jennifer Olland's November 3, 2022 citizen complaint was not provided with DCP&P Investigator Terrance Campbell's statement that the child "never observed you touch anyone" and that her belief was based on what "her mommy said." (See Exhibit 11 and 11A.)

"The child disclosed to me that she believed you touch children. 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 Exhibits 11 and 11A.)

RESPONSE: Objection. This request is overly broad and unduly burdensome. By way of further response, Defendant cannot admit or deny the allegation of this paragraph insofar as it seeks information regarding what another individual was provided or reviewed. As such, this Answering Defendant does not have personal knowledge of and cannot testify to those matters.