

FILED**JUN 29 2018**

ORDER PREPARED BY THE COURT

BONNIE J. MIZDOL, A.J.S.C.

IN THE MATTER OF

ELIE C JONES.

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION
 BERGEN COUNTY
 DOCKET NO. BER-L-2683-18

Civil Action**ORDER**

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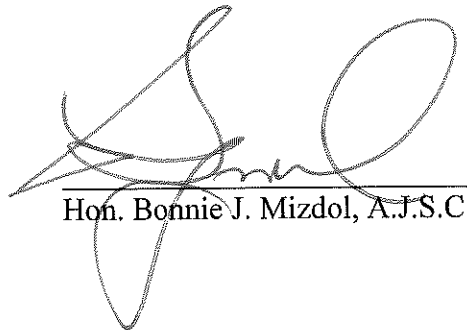
THIS MATTER, having been opened by the Court, *sua sponte*, upon its own Order to Show Cause, and the respondent, Elie C. Jones, appearing as a *self-represented litigant*, and the Court having considered its own records, Elie C. Jones' response, amicus submitted by the Township of Teaneck, represented by Michael D. Witt, Esq., (Chasan Lamparello Mallon & Cappuzzo, PC) and oral argument having been heard on May 16, 2018,

IT IS, on this 29th day of June 2018, for good cause shown, **ORDERED**:

1. That Respondent Elie C. Jones' request that Hon. Bonnie J. Mizdol, A.J.S.C. recuse herself from the matter be and the same is hereby DENIED;
2. That the Township of Teaneck's Motion on Short Notice for Leave to Appear as Amicus Curiae Pursuant to R. 1:13-9 is hereby GRANTED;
3. That Elie C. Jones be and is hereby prohibited from filing any criminal, quasi-criminal, civil or municipal code violation complaint in any court in the State of New Jersey unless and until said complaint has been reviewed and approved for filing by the Bergen County Assignment Judge who, as soon thereafter as is practicable, shall determine whether to reject said complaint or whether a meritorious claim exists;

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4. That the Superior Court Clerk and all Municipal Court Clerks are hereby directed to refuse to accept any complaint for filing from Elie C. Jones unless and until receipt of approval from the Bergen County Assignment Judge is received;
5. That Elie C. Jones' entry into the Bergen County Courthouse is hereby conditioned on his production of a notice of hearing;
6. That Elie C. Jones' request for Trial Court Administrator Laura Simoldoni to be removed as his liaison to the Bergen County Courthouse is hereby DENIED;
7. That as permitted by R. 4:6-4 the Court hereby dismisses without prejudice pursuant to R. 4:37-2(a) any civilian criminal complaints filed by Elie C. Jones from January 1, 2018, through the date of this order; with the exception of any pending civilian criminal complaints wherein a probable cause determination has been previously made;
8. That notwithstanding these restraints, Elie C. Jones shall be permitted to file any application for relief under the Prevention of Domestic Violence Act, N.J.S.A. 2C:25-17 et. seq. without filter.



Hon. Bonnie J. Mizdol, A.J.S.C.

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FILED
JUN 29 2018
BONNIE J. MIZDOL, A.J.S.C.

IN THE MATTER OF	:	SUPERIOR COURT OF NEW JERSEY
	:	
	:	CIVIL DIVISION
ELIE C. JONES	:	
	:	BERGEN COUNTY
	:	
	:	DOCKET NO. BER-L-2683-18
	:	

Argued: May 16, 2018

Decided: June 29, 2018

Honorable Bonnie J. Mizdol, A.J.S.C.

OPINION

Introduction

[The judiciary is] an independent branch of government constitutionally entrusted with the fair and just resolution of disputes in order to preserve the rule of law and protect the rights and liberties guaranteed by the Constitution and laws of the United States and this State Required to accomplish our mission are four paramount values representing the core of what we stand for as an organization: (i) independence; (ii) fairness; (iii) integrity; and (iv) quality service.

[The Superior Court of New Jersey, Mission Statement, and Statement of Core Values (2012), available at www.njcourts.org/mission.htm.]

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Before the Court is the return of an Order to Show Cause (“OTSC”) executed, *sua sponte*, on April 6, 2018, directing Elie C. Jones (“Jones”), a serial *self-represented* litigant filer, to appear on April 30, 2018¹, and show cause: (a) why an order should not be entered requiring all future criminal, quasi-criminal, civil and/or municipal code violations filed by Jones to be reviewed by this Court, as soon as practicable after being filed, but before service is effectuated, with this Court then to determine, for good cause, whether to *sua sponte* dismiss any patently frivolous or non-meritorious criminal, quasi-criminal, civil and/or municipal code violation; (b) why an order should not be entered requiring Jones’ entry to the Bergen County Courthouse be conditioned on his production of a notice of hearing; and (c) why Trial Court Administrator, Laura Simoldoni, (“TCA Simoldoni”) should be removed as his liaison to the Bergen County Courthouse.

Facts and Procedural Posture

By way of background, Jones, acting as a *self-represented* litigant, as of June 26, 2018, filed 214 civilian criminal complaints since 2016. Of the 214 complaints, 201 were filed in 2018. Of the 201, 115 have been filed since issuance of the OTSC on April 6, 2018.

To date, 66 have been adjudicated. Of the adjudicated complaints, 54 have been dismissed for either lack of probable cause or voluntarily by Jones. Of the remaining 12 wherein requisite probable cause was found, Jones voluntarily dismissed 2, 8 await trial, 1 resulted in a not guilty finding, and 1 in a guilty finding.

¹ Oral argument was adjourned at Jones’ request to May 16, 2018.

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What began as retaliatory filings between Jones and his sister Teresa Alston (“Alston”), following a chancery division litigation² with a central theme of Jones denying Alston access to their mother escalated into the filing of cross municipal and domestic violence complaints, numerous amendments to those cross complaints, and fourteen (14) contempt complaints for alleged violations of the temporary restraining orders granted to each.

Jones has since expanded the scope of his filings to include his aunt, Barbara Clayton, various Township of Teaneck employees, police officers, councilmembers and residents. Jones has also filed civilian criminal complaints against employees of the New Jersey Judiciary including: Hon. Bonnie J. Mizdol, A.J.S.C., Hon. Robert P. Contillo, P.J.Ch.; Hon. Peter J. Melchionne, P.J.F.P.; and Trial Court Administrator Laura Simoldoni (“TCA Simoldoni”), all of the Bergen Vicinage. All complaints against members of the Bergen judiciary have been transferred to Passaic County for resolution.

On March 5, 2018, Teaneck Police Officer Harold Clark issued Jones a parking ticket for parking in a “council members only” parking space. Illustrative of Jones’ pattern of retaliatory filings, between March 14, 2018, and March 15, 2018, he filed 13 civilian criminal complaints against Police Officer Clark alleging 26 statutory violations. Of the 13 complaints filed, 7 have had probable cause hearings; of those 7 complaints, 6 were dismissed for lack of probable cause, leaving a singular guilty verdict for violation

² The Chancery action Teresa Alston et. al. v. Elie Jones et. al., Docket no. BER-C-242-16 was instituted on August 16, 2016, by Jones’ sisters Teresa Alston, Florenda Jones and Vickie Jones. The action alleged that Jones barred his sisters from communicating with their shared biological mother Litty Sue Jones (“Litty”). The lawsuit sought 1) Jones’ removal as Litty’s caregiver; 2) the sisters ability to have visitation with Litty and 3) have Litty’s finances monitored by the court. Following an arduous 10 month long back-and-forth all parties voluntarily agreed to dismiss the case. On June 15, 2017, Hon. Robert P. Contillo, P.J. Ch. dismissed the case with the provision that Litty shall have visitation and phone communication with her daughters.

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of N.J.S.A. 39:3-33 (Display of Unclear, Indistinct License Plates). Venue was transferred from the Teaneck Municipal Court to Bergen's Vicinage II Municipal Court due to the obvious conflict of having the Teaneck Municipal Court conduct a trial regarding one of its Borough employees. The same is true of all other complaints lodged against Teaneck employees.

The history of domestic violence cross complaints between Jones and his sister Alston is necessary for evolution of the facts.

Jones made application for a temporary restraining order ("TRO") against Alston on October 5, 2017, under BER-FV-02-675-18, alleging, "[Alston] became hostile while in court. [Jones] report[ed] [Alston] walked towards him while in court... [stating], 'You're an asshole, Elie. You're an asshole, Elie. I'm gonna fucking kill you Elie.' [Jones] report[ed] he was afraid of [Alston]." Jones Complaint at 1, State of New Jersey v. Teresa Alston, No. FV-02-675-18. The TRO was granted. Thereafter, Jones amended his complaint 8 times.

The substance of those amendments follows:³

November 14, 2017	<ul style="list-style-type: none"> Jones alleged Alston was in contempt a domestic violence order by appearing at the Care One Facility, from which Alston was barred. Jones stated a belief that Alston him from Hackensack, New Jersey to the Care One Facility on November 6, 2017. Jones further reported that the Care One Facility has surveillance footage of Alston inside and outside of the facility. Jones reported he also filed contempt charges with the Teaneck Police Department.
November 17, 2018	<ul style="list-style-type: none"> On November 12, 2017, Alston entered the Care One Facility knowing that she was prohibited from the location. The Teaneck Police Department was called.

³ Annexed to this opinion as Exhibit A is Hon. Peter J. Melchionne's P.J.F.P., March 12, 2018, Order dismissing Jone's domestic violence complaint. (Docket No. BER-FV-675-18).

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	<ul style="list-style-type: none"> On November 15, 2017, Alston went to the Teaneck Police Department making harassing and untrue statements about Jones. Jones reported that Alston misinformed police by telling them she had access to the Care One Facility to visit the parties' mother. On November 15, 2017, Alston amended her complaint with untrue statements with the intention of harassing "DEF" [sic] Alston stated she had a visit with the parties' mother at Care One when Alston though prohibited from doing so. On November 15, 2017, Alston filed a modification application to have access to a protected party on Jones' TRO in order to harass, coerce, and intimidate. November 16, 2017, after a court hearing, Alston intensely sucked her teeth at Jones as he exited the courtroom. Jones felt harassed November 17, 2017, Alston harassed Jones by making amendments to her complaint against him with false statements to intimidate Jones
November 21, 2017	<ul style="list-style-type: none"> On November 21, 2017, while in the hallway of the courthouse Alston was walking in another direction, upon seeing Jones she walked towards him, rolled her eyes and sucked her teeth in an intimidating and harassing manner. Jones believed Alston followed him to the court. Jones heard the parties' other sister Florenda Jones say to Alston 'where are you going, what are you doing?' Jones indicated this was Alston's third violation of the TRO.
December 11, 2017	<ul style="list-style-type: none"> On December 1, 2017, Alston had her son follow Jones in the courthouse after a hearing, wherein Alston was escorted out of the building. Jones believed the action was a violation of the TRO and harassing conduct. Jones notified the Bergen County Sheriff's Department and a report was taken.
January 11, 2018	<ul style="list-style-type: none"> On January 11, 2018, Alston was in violation of a Domestic Violence Order. Jones stated that while before Hon. Anthony N. Gallina, P.J.M.C., Alston cursed at Jones and spoke directly to him. Alston also flailed her arms and stared at Jones in a menacing manner. Jones reported that Alston got upset when her attorney approached and spoke to Jones. Alston cursed and asked why the fuck Jones was talking to her attorney. Jones reported there were multiple witnesses to the event. Jones also stated that Alston was taking pictures of him in the courtroom.

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January 18, 2018	<ul style="list-style-type: none"> On January 11, 2018, while Jones was in the DV-Unit, speaking to staff, Alston entered the office four different times to purposely intimidate and harass Jones by speaking and pointing to him.
February 23, 2018	<ul style="list-style-type: none"> On February 9, 2018, Alston filed over twenty (20) false complaints, which were in violation of the harassment provisions of the restraining order. On February 22, 2018, while in the courtroom, Alston called Jones a bastard, threatened him, and became severely disorderly. During the hearing, Alston cursed at Jones, called him names, and made faces at him, which required the presiding judge to require a Sheriff's Officer to call Alston to order. Jones believed the Sheriff's Department failed to follow protocol by not arresting Alston for the TRO violation. Approximately an hour later Alston began yelling at Jones and speaking directly to him in front of the DV-Unit. Jones asserted that Alston continued to verbally abuse him. Jones further asserted that Alston made false, harassing, amendments to her complaint. During the incident, Jones stated he was in fear for his safety and life and emotionally distressed.
February 27, 2018	<ul style="list-style-type: none"> Jones reported that On February 9, 2018, Alston made multiple "false swearing's" to the DV-Unit and Hon. Peter J. Melchionne, P.J.F.P. of incidents that did not occur, which Jones believed were done to harass him. Jones reported that on February 26, 2018, in violation of a DV Order Alston stalked him while he was in the Teaneck Public Library. Jones reported that Alston was making faces at him. Jones left the library to make a report to the Teaneck, Police Department. He asserted that Alston followed him, and while he was in the Police station, Alston was looking in the window and making gestures towards him.

On October 6, 2017, the day following entry of the TRO against Alston, she applied for a TRO against Jones under BER-FV-02-678-18. Alston alleged that on September 21, 2017, while appearing before Hon. Roy F. McGeady, P.J.M.C., Jones "yell[ed] out [her] social security number. [Jones] also yelled out that he was going to call 'Greater Housing' which Alston report[ed] [was] a threat against her Section 8

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Housing. Alston further report[ed] that [Jones] said he was going to kill her.” Alston Complaint at 1, State of New Jersey v. Elie Jones, No. BER-FV-02-678-18.

Alston further reported that on October 5, 2017, “while she and [Jones] were in Judge McGeady’s courtroom [Jones] told [Alston] that he was going to get her and that he was in the process of doing that. [Alston] further report[ed] [that] Jones said he was going to fuck her up. [Alston] further report[ed] [that] [Jones] asked [her] to dismiss the criminal charges she [had] against him.” *Ibid.* Her TRO was granted. Thereafter, Alston amended her complaint 4 times⁴. The substance of the amendments follows:

November 15, 2017	<ul style="list-style-type: none"> Alston reported that on November 15, 2017, Jones appeared that the Care One Facility where the parties’ mother resides knowing she was there for her scheduled visitation. Alston states as she was entering the facility, Jones was beside their sister knowing that Alston would be there.
November 17, 2018	<ul style="list-style-type: none"> Alston recounted that while in the hospital between October 18, 2017, through October 26, 2017, Jones called the hospital and made allegations against Alston, accusing her of being a psychiatric patient that needed to be in the Psychiatric Unit, and a volatile person. Jones filed three (3) criminal complaints on June 7, 2017, one (1) on August 21, 2017, three (3) on August 22, 2017, and two on August 23, 2017. Jones also filed four (4) contempt charges after he agreed to dismiss the charges in court. Alston reported the contempt charges were later dismissed. Alston stated that Jones continued to file complaints against her to raise questions as to her credibility. Jones wrote on social media that Alston was a criminal and violent. Jones filed a complaint with the Law Division against Alston and other family members under Docket No. BER-L-3743-16. Alston further reported that she is afraid for her life and

⁴Annexed to this opinion as Exhibit A is Hon. Peter J. Melchionne’s P.J.F.P., March 12, 2018, Order dismissing Alston’s domestic violence complaint. (Docket No. BER-FV-678-18).

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	well-being because she was constantly trying to ensure that Jones did not do anything to harm her. Jones previously stated that he hired a private investigator to watch Alston and that he had Alston's phone tapped.
January 12, 2018	<ul style="list-style-type: none"> On January 9, 2018, while Alston was in the DV intake room speaking with staff, Jones entered the room four different times to purposely intimidate and harass Alston.
February 7, 2018	<ul style="list-style-type: none"> On February 6, 2018, as Alston went to enter the courtroom, Jones rushed past her and the parties' aunt almost knocking Alston and their aunt.

After entry of Jones' TRO against Alston, he filed ten (10) contempt complaints charging sixteen (16) separate TRO violations against her:

COMPLAINTS #	FILED	CHARGE	DESCRIPTION
S 2018 000109	02/12/18	2C:29-9B(2)	CONTEMPT - VIOLATION OF RESTRAINING ORDER
S 2018 000141	02/23/18	2C:29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
		2C:29-9B(1)	CONTEMPT - VIOLATE DV ORDER BY CRIME OR DP OFFENSE
		2C:29-9B(2)	CONTEMPT - VIOLATION OF RESTRAINING ORDER
S 2018 000095	02/28/18	2C:29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
		2C:29-9B(1)	CONTEMPT - VIOLATE DV ORDER BY CRIME OR DP OFFENSE
S 2018 000102	03/01/18	2C:29-9B(2)	CONTEMPT - VIOLATION OF RESTRAINING ORDER
S 2018 000155	03/06/18	2C:29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
S 2018 000156	03/06/18	2C:29-9B(2)	CONTEMPT - VIOLATION OF RESTRAINING ORDER
S 2018 000157	03/06/18	2C:29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
		2C:29-9B(1)	CONTEMPT - VIOLATE DV ORDER BY CRIME OR DP OFFENSE
S 2018 000158	03/06/18	2C:29-9B(1)	CONTEMPT - VIOLATE DV ORDER BY CRIME OR DP OFFENSE

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		2C:29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
S 2018 000159	03/06/18	2C:29-9B(1)	CONTEMPT - VIOLATE DV ORDER BY CRIME OR DP OFFENSE
		2C:29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
S 2018 000126	03/14/18	2C:29-9B(1)	CONTEMPT - VIOLATE DV ORDER BY CRIME OR DP OFFENSE

Of the sixteen (16) contempt charges, probable cause was found for the issuance of one (1); complaint No. S-2018-000109.

Responding in kind, Alston then filed two (2) contempt complaints, with thirteen (13) separate charges against Jones alleging:

S 2018 000101	2C:33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
	2C:33-2A(2)	DISORDERLY CONDUCT-IMPROP BEHAV-CREATE HAZARDOUS CONDT
	2C:33-2B	DISORDERLY CONDUCT-OFFENSIVE LANGUAGE
	2C:29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
	2C:29-9B(2)	CONTEMPT - VIOLATE DOMESTIC VIOLENCE RESTRAINING ORDER
	2C:33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
	2C:33-4B	HARASSMENT-STRIKING/OFFENSIVE TOUCHING/THREATS TO
S 2018 000131	2C:33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
	2C:33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
	2C:33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
	2C:12-10C	STALKING-STALKING IN VIOLATION OF COURT ORDER
	2C:29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
	2C:29-9B(2)	CONTEMPT - VIOLATE DOMESTIC VIOLENCE RESTRAINING ORDER

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On March 20, 2018, Hon. Peter J. Melchionne, P.J.F.P., at the conclusion of the domestic violence final hearing on the cross-complaints, found that neither Jones nor Alston had established the requisite proofs for entry of a Final Restraining Order. In his oral opinion, he addressed, at length, the history between the two, their animosity toward each other, and their overuse and misuse of the judicial system.

In discussing Jones and Alston's use of the judicial system Hon. Peter J. Melchionne, P.J.F.P., stated:

Credibility of both parties, you say whatever comes to your mind. Neither supports statements or allegations with evidence they can rely upon. I have little confidence in either of your truthfulness or veracity for the truth. The parties engage in extreme gamesmanship with the judiciary system, and their calling for witnesses without due regard for the people. They wish to inconvenience all for their own self-gain and not to assist this court in rendering a decision. **They each use the judicial system, not for its intended purpose.** (emphasis added)

Oral Decision, March 20, 2018, at 12:24 p.m., Jones v. Alston, Docket No. BER-FV-675-18 and BER-FV-678-18.

In addressing each party's behavior to judiciary staff Judge Melchionne opined:

It is clear that the way... [Jones and Alston] conduct [themselves] to each other is less than model. You conduct yourselves similarly to anyone you encounter, particularly here at the courthouse. The minute a staff member may not provide you what you asked for, or looks at you funny, or asks you to wait, your conduct becomes less than appropriate. Similarly, that's how you treat each other.

The behavior you exhibit in the courtroom in front of me and at me and at the Sheriff's officers here is deplorable. When I enter an unfavorable ruling, I become the target of being biased, racist, I'm accused of pre-judging the case.

Id. at 12:31 p.m.

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In concluding, the judge stated “The instant complaints clogged our domestic violence system [and overly burdened] the support personnel for people who are true victims of domestic violence.” Id. at 12:39 p.m.

The Prosecutor’s Office has since dismissed all eighteen (18) contempt filings against Jones and Alston due to the dismissal of their underlying TROs.

In 2018, Jones expanded the scope of his proliferous filings to include various Township of Teaneck employees, police officers, councilmembers and residents. He has filed 142 municipal court complaints, 104 after entry of the instant OTSC⁵.

Jones has accused the Township Clerk of harassment, filed charges against Teaneck Police Officers for obstructing the administration of law, harassment, official misconduct and bias intimidation. Of late, he has begun to scout the municipal parking lot issuing citations to police officers for failure to wear seatbelts, for improper parking, display of improper license plates and to the municipality itself for charges ranging from failure to have valid inspection stickers on township vehicles to failure to abate stagnant water.⁶

In addition to his relentless complaint filings, Jones’ vexatious tactics are also clearly demonstrated by ramped-up Open Public Records Act (“OPRA”) requests. Between January 1, 2015 and June 27, 2018, Jones has filed 668 OPRA requests with the Township of Teaneck, 196 filed in 2018 alone. Additional OPRA requests have been made to Bergen County’s Vicinage II Municipal Division, and the Municipal Courts of

⁵ Exhibit C outlines the myriad of complaints involving the Teaneck defendants.

⁶ (See Exhibit D to the Certification of Michael A. Witt, Esq., in support of the Township of Teaneck’s motion for leave to appear as amicus pursuant to R. 1:13-9)

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Teaneck, Hackensack, and Englewood. In the first six months of 2018, he has filed 78 municipal court OPRA requests, 65 of which were directed to the Teaneck Municipal Court. A sample OPRA request served by the Teaneck Municipal Court on June 4, 2018, seeks:

1. Copies of records “reviewed, entered and touched by Captain Ferrante while within the Teaneck Municipal Court on April 16, 2018 to May 29, 2018.
2. Records available that were the basis of Captain Ferrante’s visits to the Teaneck Municipal court from April 16, 2018 to June 4, 2018⁷.

Teaneck is a body politic of the State of New Jersey, accountable to township taxpayers. Each and every time Jones files a complaint against a township employee or official, the township council appoints legal counsel to defend the employee against Jones’ excessive and unfounded complaints. These complaints have a deleterious effect on the judicial system and the public interest by absorbing a considerable amount of judicial and municipal resources. The escalating nature of the complaints threaten the economic well-being of the Township, the efficiency of the Teaneck Municipal Court and its conflict court, Bergen’s Vicinage II Municipal Court and further serves to disrupt operations of all. Jones’ complaints also affect other counties. Passaic County, as Bergen’s sending vicinage, is also taxed due to Jones’ complaints filed against Bergen County jurists and employees.

That disruption also applies to Jones’ frequent presence in the courthouse, his telephonic complaint campaign and his erratic behavior to court staff dating back to

⁷ Teaneck’s Court Administrator, Craig Ferdinand, CMCA responded to the request on June 12, 2018. As to Jones’ first request Mr. Ferdinand advised that Captain Ferrante is not a complaining witness in any matter(s) in the Teaneck Municipal Court for the period set forth in the application. As for Jones’ second request, no such records were available.

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December 2016. In a measured response to Jones' courthouse behaviors, TCA Simoldoni was initially appointed Jones' liaison to the Chancery Division. The incident that led to her appointment, involved Jones pounding his fist against the Chancery Division customer service glass window and his use of profanity. (Simoldoni letter, March 2, 2018)⁸. Subsequently, TCA Simoldoni's role was expanded when she was appointed as Jones' liaison to the Family Division in January 2018. Her expanded role was necessitated by continued rude behavior, which included screaming, use of profanity to staff as well as the filing of criminal complaints against staff. Complaints by Jones against TCA Simoldoni and Family Division Team Leader, Tracy Andolini sent to the AOC have been investigated and found to lack merit.

Beginning in January 2018, Jones was instructed that court staff would no longer accept telephonic communications and that all communication to the court should be in writing and directed via letter, fax or email to TCA Simoldoni. This action was necessary due to Jones' relentless telephonic complaints, which only intensified over time. Jones routinely called employees in the courthouse several times per day. He was rude, used profanity, and oftentimes insisted they were under investigation. TCA Simoldoni recounted in a March 1, 2018, letter to Jones that despite instruction to refrain from calling, Jones continued to call the courthouse "approximate[ly] 5 to 10 [times] per day [and make] daily visits to the courthouse on days when [he has] not scheduled an appointment to meet with her."

⁸ Annexed to this opinion as Exhibit E are select letters sent by TCA Simoldoni to Jones to further illustrate Jones' interactions with this courthouse. The letters are dated March 2, 2018, March 5, 2018, and March 9, 2018.

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Since 2016, Hon. Bonnie J. Mizdol, A.J.S.C. has received in excess of 60 letters from Jones on a variety of topics asserting numerous allegations. In 2016, the Court received approximately twelve (12) letters; in 2017, the number rose to approximately twenty-two (22); and to date, in 2018 the Court has received approximately twenty-nine (29). This does not include letters received by other chambers. The letters are oftentimes copied to multiple individuals including, but not limited to Hon. Stuart Rabner, our Chief Justice; Hon. Glenn A. Grant, Acting Administrative Director of the Courts; Hon. Peter J. Melchionne, P.J.F.P., Hon. Robert P. Contillo, P.J.Ch., TCA Laura Simoldoni, “DV Unit”, Diana Moskal, Bergen County Family Division Manager, “DV Team Leaders”, “Trenton”, Administrative Office of the Courts, “Chief of Staff”, “Trenton New Jersey”, “DV Unit Clerk”, “Trenton Investigator”, “State of New Jersey”, New Jersey State Police, Bergen County Sheriff’s Department, NAACP and the ACLU.

Frequently, Jones’ correspondence alleges bias, intimidation, retaliatory conduct, harassment, and racism by court staff. TCA Simoldoni is tasked with investigating such claims in the courthouse. She has found all of Jones’ claims to be meritless. Similarly, this court has found Jones’ claims of such conduct by TCA Simoldoni to be meritless.

Jones has continued his unrelenting writing campaign to this court and TCA Simoldoni. His latest letters often allege that Judge Mizdol’s Chambers and/or TCA Simoldoni do not respond to Jones’ correspondence when in actuality, it is the practice of Chambers and TCA Simoldoni to respond to Jones, in writing, within twenty-four (24) hours. By way of example only, since April 24, 2018, TCA Simoldoni has received approximately twenty-seven (27) pieces of correspondence from Jones; most of which

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are duplicative. Additionally, the correspondence is oftentimes delivered in triplicate, by email, by hand, and by regular mail.

Apart from the Jones-Alston cross domestic violence complaints and the civilian criminal complaints outlined previously, Jones has also been party to eleven (11) different cases in the Bergen Vicinage since 2016 consisting of eight (8) in the law division, one (1) in special civil part, and two (2) chancery division matters as follows:

DOCKET NO.	CASE NAME	CASE TYPE	STATUS
BER-DC-017326-17	LVNV FUNDING LLC. v. ELIE JONES	SMALL CLAIMS DEBT	DEFAULT by CLERK
BER-L-1534-16	ELIE JONES v. FORTE CLARK	AUTO NEGLIGENCE	ACTIVE
BER-L-4596-16	ELIE JONES v. TOWNSHIP OF TEANECK	DISCRIMINATION	DISMISSED BY APP. DIV.
BER-L-4897-16	ELIE JONES v. PORTUNE	AUTO NEGLIGENCE	SETTLED
BER-L-6743-16	ELIE JONES v. THERESA ALSTON	DEFAMATION	DISMISSED WITH PREJUDICE
BER-C-000242-16	THERESA ALSTON v. ELIE JONES	OTHER GENERAL EQUITY	DISMISSED w/o PREJUDICE
BER-L-7033-16	ELIE JONES v. CITY OF ENGLEWOOD	DISCRIMINATION	DISMISSED w/o PREJUDICE
BER-L-7376-16	ELIE JONES v. PORTUNE	AUTO NEGLIGENCE	CLAIMS vs. 3 DEFENDANTS SETTLED; CLAIM AGAINST 4th DEFENDANT WAS DISMISSED
BER-L-8770-16	ELIE JONES v. BARBRA CLAYTON	TORT	DISMISSED w/o PREJUDICE
BER-L-4993-17	ELIE JONES v. CITY OF ENGLEWOOD	DISCRIMINATION	DISMISSED w/o PREJUDICE
BER-C-000014-17	TOWNSHIP OF TEANECK v. ELIE JONES	OTHER GENERAL EQUITY	DISMISSED w/ PREJUDICE

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Of the eleven (11), three (3) involved complaints and counterclaims between and among Jones, Alston and their aunt, Barbra Clayton. Of the eleven (11), one (1) [Elie C. Jones et. al. v. Renee A. Forte-Clark et. al., (Docket No. BER-L-1534-16)] remains active.

LAW

Self-Represented Litigants and Frivolous Filings

The “Court need not... credit a pro se plaintiff’s ‘bald assertions’ or ‘legal conclusions.’” D’Agostino v. CECOM RDEC, No. 10-4558, U.S. Dist. LEXIS, 95666, at *1 (D.N.J. Sept. 10, 2010). The Court is “not compelled to accept unwarranted interferences, unsupported conclusions or legal conclusions disguised as factual allegations.” Baraka v. McGreevey, 481 F.3d 187, 211 (3d Cir. 2007). Legal conclusions couched as factual allegations and “threadbare recitals of the elements of a cause of action, supported by mere conclusory statements, [will] not suffice” to prevent a motion to dismiss. Phillips v. Cnty. Of Allegheny, 515 F. 3d 224, 234 (3d. Cir. 2008) (quoting Bell Atl. Corp. v Twombly, 550, 555 (2007)).

The due process clause of the Fourteenth Amendment requires the judicial system to refrain from preventing legitimate access to the courts. See Brown v. Grabowski, 922 F.2d 1097, 1113 (3d Cir. 1990) (citing Wolff v. McDonnell, 418 U.S. 539, 578-79 (1974); Rosenblum v. Borough of Closter, 333 N.J. Super.385, 389-90 (2000). “One of the primary reasons for allowing litigants who cannot afford a lawyer to proceed *pro se* is the recognition that ‘[t]he due process clause requires that every man shall have the protection of his day in court.” Michael J. Mueller, Note, Abusive Pro se Plaintiffs in the Federal Courts: Proposals for Judicial Control, 18 U. Mich. J.L. Reform 93, 97-98 (1984) (quoting Truax v. Corrigan, 257 U.S. 312, 332 (1921). However, there is an

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expectation that all litigants will “seek their day in court” on a good faith basis.

Unfortunately, the rise of litigants opting to proceed *pro se* has contributed to the rise of repetitious and frivolous lawsuits, Meuller, *supra*, at 98, 104, and in New Jersey, baseless criminal citizens’ complaints as well.

The motives of *pro se* litigants who abuse the courts are often “as varied as the individuals themselves.” *Id.* at 108. Often their aim is to exact reprisal against the judicial system, including judges, lawyers, and court personnel. *Id.* at 107. At other times, the “immediate goal [is] to clog the court’s docket in an attempt to disrupt the orderly administration of the courts and impede the judicial machinery.” *Id.* More often than not, their objective is to engage in vexatious and confounding litigation against private parties with whom they have had disputes. *Id.* at 108.

Frivolous litigation has had a deleterious effect on the judicial system and the public interest. Most obviously, frivolous *pro se* litigants absorb a considerable amount of judicial resources and cause and prolong the delay of adjudication of meritorious actions. *Id.* at 112. Several consequences of such delays have been identified. First, “[a]s caseloads increase, judges have less time to devote to each case,” which “threatens the quality of justice.” *Id.* at 113. Second, “long delays in adjudication create public dissatisfaction and frustration with the courts,” which ultimately “breeds disrespect for the law.” *Id.* at 113-14. Third, unchecked abusive litigation prolongs the harassment of defendants. *Id.* at 114. Fourth, “excessive litigation against certain individuals or groups of individuals may deny them fair access to the judicial process.” *Id.* These consequences demonstrate the judiciary’s strong interest in deterring and protecting against the burdens of repetitious, frivolous litigation. *Id.*

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The Right of this Court to Limit Frivolous Litigation

The misuse of the judicial process was considered by the United States Supreme Court, which determined that in such circumstances, the courts can refuse to even allow the filing of the papers. *In re Demos*, 500 U.S. 16, 111 S.Ct. 1569, 114 L. Ed. 2d 20 (1991); *In re Sindram*, 498 U.S. 177, 111 S.Ct. 596, 112 L. Ed. 2d 599 (1991); *In re McDonald*, 489 U.S. 180, 109 S.Ct. 993, 103 L. Ed. 2d 158 (1989); *In re Anderson*, 511 U.S. 364, 114 S.Ct. 1606, 128 L. Ed. 2d 332 (1994). Many litigants with legitimate claims await hearings in the family court. Judicial time and energies are scarce societal resources, especially in the family courts. We cannot permit frivolous matters, sparked by a personal vendetta, to consume the attention and resources to the detriment of deserving litigants who wait for their legitimate motions to be heard.

Kozak v. Kozak, 280 N.J. Super. 272, 278 (Super. Ct. 1994).

The Appellate Division in Rosenblum held that in certain circumstances, due process is not impaired when a court enjoins a *pro se* litigant who has filed numerous frivolous matters. Rosenblum, *supra* 333 N.J. Super. at 391. “Where a pattern of frivolous litigation can be demonstrated, the Assignment Judge can prevent the complaint from being filed.” Id.⁹ “We hold that an Assignment Judge can prevent the filing of a complaint, or issuance of a summons thereon...” Id. at 387. This holding “is consistent with the trend of developing case law around the country.” Id. at 392; see Abdul-Akar v. Watson, 901 F.2d 329, 331-34 (3d Cir. 1990) (finding when a court identifies a litigant “whose history of repetitious and frivolous filings indicates a clear intent to abuse the courts,” “it is entitled to resort to its power of injunction and contempt to protect its

⁹ The responsibility of controlling the filing of frivolous complaints generally falls on the Assignment Judge of the vicinage who has the “plenary responsibility for the administration of all courts” within the vicinage. R. 1:33-4(a).

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process”); Lysiak v. Commissioner of Internal Revenue, 816 F.2d 311, 312-13 (7th Cir. 1987) (holding where sanctions will not protect against an abusive litigant, the court “has the authority to implement a remedy that may include restrictions on that litigant’s access to the court”); Procup v. Strickland, 792 F.2d 1069, 1073-74 (11th Cir. 1986) (holding “[t]he court has a responsibility to prevent single litigants from unnecessarily encroaching on the judicial machinery needed by others”); Castro v. United States, 775 F.2d 399, 410 (1st Cir. 1985) (“emphasiz[ing] that an injunction against litigation should be narrowly drawn to fit the specific vice encountered”); Armstrong v. Koury Corp., 16 F. Supp. 2d 616, 620 (M.D.N.C. 1998) (holding “an injunction from filing any further actions is an appropriate sanction to curb groundless, repetitive, and frivolous suits....”); Mallon v. Padova, 806 F. Supp. 1189, 1190 (E.D.Pa. 1992) (enjoining a *pro se* litigant who filed eleven (11) frivolous lawsuits within a period of two (2) weeks); Stitch v. United States, 773 F. Supp. 469, 471 (D.D.C. 1991) (requiring a “serial litigator” who filed more than thirty (30) frivolous lawsuits within a period of three (3) years obtain leave of court before filing any future suits). See also Parish v. Parish, 412 N.J. Super. 39, 48 (App. Div. 2010). “[I]f it is convinced that there is a substantial likelihood that a litigant will continue to file frivolous lawsuits, a district court is not required to sit idly by and allow a party to waste precious judicial resources.” Rosenblum, *supra*, at 393 (citing Mallon v. Padova, 806 F. Supp. 1189, 1194 (E.D. Pa. 1992)).

The Rosenblum Court identified four (4) requirements that must be met before an injunction can be issued. Rosenblum, *supra* at 392-97. First, the Assignment Judge must evaluate “the volume and disposition of cases ... before the plaintiff can be said to have filed only frivolous litigation.” *Id.* at 397. Second, the Assignment Judge must “give

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reasons for [the] conclusion that the complaints may not be filed.” Id. Third, the Assignment Judge must “be assured that more traditional sanctions will not protect against frivolous litigation.” Id. at 398; see N.J.S.A. 2A:15-59.1; R. 1:4-8(d). Lastly, the Assignment Judge “must review the new complaint to be assured that a meritorious claim is not suppressed.” Rosenblum, supra, at 396.

Recusal

Rule 1:12-1 provides the general standard for recusal. The judge of any court shall be disqualified on the court's own motion and shall not sit in any matter, if the judge

- (a) is by blood or marriage the second cousin of or is more closely related to any party to the action;
- (b) is by blood or marriage the first cousin of or is more closely related to any attorney in the action. This proscription shall extend to the partners, employers, employees or office associates of any such attorney except where the Chief Justice for good cause otherwise permits;
- (c) has been attorney of record or counsel in the action;
- (d) has given an opinion upon a matter in question in the action;
- (e) is interested in the event of the action;
- (f) has discussed or negotiated his or her post-retirement employment with any party, attorney or law firm involved in the matter; or
- (g) when there is any other reason which might preclude a fair and unbiased hearing and judgment, or which might reasonably lead counsel or the parties to believe so.

Paragraphs (c), (d) and (e) shall not prevent a judge from sitting because of having given an opinion in another action in which the same matter in controversy came in question or given an opinion on any question in controversy in the pending action in the course of previous proceedings therein, or because the board of chosen freeholders of a county or the municipality in which the judge resides or is liable to be taxed are or may be parties to the record or otherwise interested.

[R. 1:12-1]

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The Rule addresses actual conflicts, bias, and the appearance of impropriety. State v. Dalal, 221 N.J. 601, 606 (2015) (quoting State v. McCabe, 201 N.J. 34, 43 (2010)). The relevant standard for a recusal is set forth in DeNike v. Cupo, 196 N.J. 502, 517 (2008), which directs courts to ask whether “a reasonable, fully informed person [would] have doubts about the judge’s impartiality?”

Amicus Curiae

R. 1:13-9(a) states:

An application for leave to appear as amicus curiae in any court shall be made by motion in the cause stating with specificity the identity of the applicant, the issue intended to be addressed, the nature of the public interest therein and the nature of the applicant's special interest, involvement or expertise in respect thereof. The court shall grant the motion if it is satisfied under all the circumstances that the motion is timely, the applicant's participation will assist in the resolution of an issue of public importance, and no party to the litigation will be unduly prejudiced thereby. The order granting the motion shall define with specificity the permitted extent of participation by the amicus and shall, where appropriate, fix a briefing schedule.

[R. 1: 13-9(a)]

“Traditionally, the role of amicus curiae was to be advisory rather than adverse. However, courts have generally shifted away from the strict Casey framework and now allow amicus curiae to be more partial. Rule 1:13-9 has been interpreted as establishing ‘a liberal standard for permitting amicus appearances.’” In re State ex rel. Essex County Prosecutor’s Office, 427 N.J. Super. 1, 5 (N.J. Super. 2012) (Internal citations omitted).

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Public Access to the Courts

i. General Prohibition on Access to the Courts as a Non-Litigant

The right of access to state courthouses derives from both the First and Fourteenth

Amendments to the U.S. Constitution. Publiker Indus., Inc. v. Cohen, 733 F.2d

1059, 1066 (3d Cir. 1984). As recited by the Second Circuit Court of Appeals in

Huminski v. Corsones:

The law plays a pervasive role in our society, and the trial is its most visible manifestation. Where for lawyers the law is found in the reporters, treatises, and statutes, for the public the epitome of legal drama is the trial. Celebrated trials compete for space in the newspapers, inspiring countless repetitions and revisions in novels, on television, and in the movies. For the general public it is in these cases . . . that the law itself is on trial, quite as much as the cause which is to be decided. Holding court in public thus assumes a unique significance in a society that commits itself to the rule of law.

Huminski v. Corsones, 396 F.3d 53, 81 (2d Cir. 2004) (citing Trial Secrecy and the First Amendment Right of Public Access to Judicial Proceedings, 91 Harv. L. Rev. 1899, 1923 (1978) (footnotes, alterations, and internal quotation marks omitted))

This broad right of access applies to both criminal and civil proceedings. Westmoreland v. Columbia Broadcasting Systems, Inc., 756 F.2d 16, 22 (2d Cir. 1984).

However, “[a] courthouse ... and, especially, ... a courtroom is a non-public forum.” Berner v. Delahanty, 129 F.3d 20, 26 (1st Cir. 1997). In Sammartano v. First Judicial Dist. Court, 303 F.3d 959, 966 (9th Cir. 2002), the court held that judicial and municipal complexes are non-public forums. “The lobby of [a] [federal] courthouse is not a traditional public forum or designated public forum, not a place open to the public for the presentation of views. No one can hold a political rally in the lobby of a federal

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courthouse. It is a non-public forum...”. Sefick v. Gardner, 164 F.3d 370, 372 (7th Cir. 1998).

The due process clause of the Fourteenth Amendment “requires states to afford civil litigants a meaningful opportunity to be heard by removing obstacles to their full participation in judicial proceedings.” Tennessee v Lane, 1997 U.S. App. LEXIS 36158 (quoting Lewis v Casey, 116 S. Ct. 2174, 2179 (1996)). Challenges by litigants to state actions that interfere with their access to the court system have most often arisen in the context of filing fees imposed by state courts that have the effect of prohibiting indigent parties from pursuing their legal claims. See e.g. Boddie, 401 U.S. 371 (state court may not deny access to divorce courts to those persons who could not afford to pay the required fee). The Court has taken the position that in such cases, the imposition of a filing fee that operates to totally deprive a party from pursuing legal action violates the due process clause “absent a countervailing state interest of overriding significance.” 401 U.S. at 377. Where, however, the restriction imposed by the government does not affect a total deprivation but a mere delay or inconvenience, the restriction does not violate the due process clause. See Sosna v. Iowa, 419 U.S. 393, 410 (1975) (holding that a durational residency requirement for filing for a divorce does not violate plaintiff’s due process rights).

Dismissal of Pleadings for Impropriety

R. 4:6-4 permits the Court to dismiss pleadings for impropriety.

(b) Impropriety of Pleading. On the court's or a party's motion, the court may either (1) **dismiss any pleading that is, overall, scandalous, impertinent, or, considering the nature of the cause of action, abusive of the court or another person** (emphasis added); or (2) strike any such part of a pleading or any part thereof that is immaterial or

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redundant. The order of dismissal shall comply with R. 4:37-2(a) and may expressly require, as a condition of the refiling of a pleading asserting a claim or defense based on the same transaction, the payment by the pleading party of attorney's fees and costs incurred by the party who moved for dismissal.

“The self-evident purpose of paragraph (b) is to provide both a procedure and sanctions for dealing with material in any pleading that [are] scandalous or redundant. Such material may either be stricken or the pleading dismissed without prejudice pursuant to R.4:37-2(a) with a monetary sanction imposed on the offending party in the event of refiling.”

Pressler, Current N.J. Court Rules, comment on R. 4:6-4 [2018].

The Rule's plain language makes clear that it was further designed to afford the Court, in its discretion, the power to dismiss pleadings that are abusive of the Court or another person.

Analysis

On April 23, 2018, Jones requested an adjournment of the scheduled April 30, 2018, Order to Show Cause to enjoin him from filing further complaints without prior review and to dismiss those frivolously or abusively filed to date. He sought an opportunity to retain counsel. The court granted his adjournment request by letter dated April 24, 2018. Despite having been given the opportunity to retain counsel, Jones determined to proceed as a *self-represented* litigant on May 16, 2018.

Jones' arguments in opposition to the OTSC contain broad based assertions. By way of example, Jones' opposition states “[r]ecently other litigants and complainants have filed similar if not more complaints than I have and OTSC have not been filed in

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those matter, one would ask the court why then??”¹⁰ [sic] Jones Opposition, at 4. Jones’ opposition also asserts: “that Laura Simoldoni has not told the truth in this matter and in fact is covering up her own wrongdoings and failure to properly investigate and report misconduct by her employees as required.” Jones Opposition, at 9. Jones also alleges that any curtailment of complaint filings or access to the courthouse is a deprivation of his constitutional rights. At oral argument he reiterated his central theme of bias, intimidation, harassment and that he is taking all avenues available, including but not limited to ACJC complaints, public investigations, private investigations, and would ultimately “seek justice by any means necessary.”

Hon. Bonnie J. Mizdol, A.J.S.C. Conflict of Interest

During oral argument, Jones stated the following to Hon. Bonnie J. Mizdol, A.J.S.C.

Being that there is matters dealing with the judiciary employees that are directly under control, I think that this matter should be... need a change of venue because you’re conflicted in the matter.

Being that these matters deal with direct matters that are dealing with the judiciary employees under your direct supervision number one. Number two, that this Order to Show Cause is being issued in an attempt to thwart my recourse in the actions being investigated against this very judiciary Vicinage II, and that can be directly being investigated against yourself [sic] as Assignment Judge of the Superior Court. So in that regard I think that these matters should be transferred to another vicinage.

[Oral Argument, May 16, 2018, at 10:09 a.m.].

In addressing whether recusal is necessary in accordance with R. 1:12-1, the Court turns to whether “a reasonable, fully informed person [would] have doubts about [Hon. Bonnie J. Mizdol’s] impartiality.” DeNike, *supra* at 517.

¹⁰ Jones’ opposition was submitted in all capitalized letters. Quotes recited by the Court from his opposition, or other correspondence contains proper capitalization.

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In State v. Dalal, 221 N.J. 601, 609 (2015) our Supreme Court held “that when there is any evidence that a defendant has conveyed a threat to prompt the recusal of a judge or manipulate the proceedings, recusal is not required. **To assess a defendant’s objective, a judge may consider direct-evidence and also draw reasonable inferences from the record.**” (emphasis added)

The mere fact that Jones has filed civilian criminal complaints against Hon. Bonnie J. Mizdol, A.J.S.C., other Bergen jurists and employees and claims there to be “active investigations” against members of the judiciary, and courthouse staff who ultimately are responsible to Hon. Bonnie J. Mizdol, A.J.S.C. does not warrant recusal. Taken to its logical conclusion, acceptance of Jones’ assertion would allow future litigants to sue members of the judiciary, or courthouse staff as a means of forum shopping. Such a notion is absurd, as it would likely disqualify every potential jurist and detrimentally affect the New Jersey court system.

This Court finds that a reasonable, fully informed person would find Jones’ tactics spawn from retaliatory actions taken against those whom he perceives disagree with him and not from meritorious claims.

Therefore, Jones’ recusal request is denied.

Amicus Curiae

An application to appear amicus pursuant to R. 1:13-9(a) must be timely made.

On May 15, 2018, the Township of Teaneck, represented by Michael D. Witt, Esq., (Chasan Lamparello Mallon & Cappuzzo, PC) filed a Motion on Short Notice to appear as amicus curiae pursuant to R. 1:13-9. During the May 16, 2018, oral argument Teaneck asserted that Jones was noticed by email, and regular mail of its motion. Jones

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disputed service and objected to the Township's motion. To ensure Jones had an opportunity to thoroughly review Teaneck's submission, the Court stayed a final decision in the matter and allowed Jones two weeks to review and file opposition. On May 23, 2018, Jones submitted his opposition.

Given that Teaneck's motion was filed prior to the May 16, 2018, oral argument and that Jones was granted two weeks to submit a written opposition to Teaneck's amicus application, the Court finds that Teaneck's motion was timely and that Jones was afforded procedural due process.

This court further finds that Teaneck's assistance will aid the Court in its ultimate determination. Teaneck is the municipality in which Jones primarily files his civilian criminal complaints and is in the best position to explain what, if any, affect the voluminous complaints have on its municipality and municipal court. The issue is of public importance to the Township of Teaneck.

Lastly, Jones has not been prejudiced by Teaneck's participation. He has been afforded ample opportunity to retain private counsel, and electing not to do so, was afforded in his *self-represented* capacity ample time to reply.

Court Limitation of Frivolous Litigation

"[D]ue to the recognized obligation of the courts to carry out its constitutional functions effectively, once an abuse of the system is identified, a litigant 'can be required to obtain leave of the court before' filing any future suits." Rosenblum, supra, at 393 (citing Stich v United States, 773 F. Supp. 469, 471 (D.D.C. 1191)). Courts exist to serve litigants, including *pro se* litigants. However, each case requires time, effort and thought.

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Excessive filings prevent the court from accomplishing its core mission of adjudicating lawsuits in a fair and efficient manner. Frivolous filings against municipalities, councilmembers, law enforcement and members of the judiciary, in particular, result in a needless and considerable waste of valuable municipal, state and judicial resources. Resources designed to serve the legitimate needs of the public and not a single individual. “[W]hen a [c]ourt concludes that a litigant has abused the judicial process by filing a multitude of frivolous §1983 cases in a relatively brief period of time and will continue to file such cases unless restrained, we hold that the court may enter an injunction directing that litigant not file section 1983 claims without leave of court...” Rosenblum, supra, at 394 (citing Abdul-Akbar v. Watson, 901 F.2d 329, 333 (3d Cir. 1990)).

Prior to determining whether an injunction on filings may be imposed, this Court must scrutinize the factors set forth in Rosenblum, supra at 392-97. In analyzing the first prong in Rosenblum, the record demonstrates the approximately 176 civilian criminal complaints filed by Jones in 2018 alone contain approximately 392 individual statutory or municipal infractions filed in four (4) different municipalities.¹¹ All of the complaints have been subject to venue changes to the Bergen Vicinage II court as they involve complaints against municipalities, councilmembers, and law enforcement.

The necessary venue changes have resulted in a monopolization of adjudications by the Bergen Vicinage II court in that Hon. Anthony N. Gallina, P.J.M.C., has been forced to schedule special sessions just to deal with the influx of Jones’ complaints.

Interestingly, the statutory and/or municipal violations charged against the municipalities, councilmembers, and law enforcement do not appear to affect Jones personally, and appear clearly to advance a retaliatory cause rather than stand on merit.

¹¹ Teaneck, Hackensack, Englewood and Bergenfield.

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In reviewing the second prong of Rosenblum, the record clearly demonstrates that Jones has engaged in a vexatious agenda of filing excessive and meritless applications to retaliate against Alston and harass all others. The moment Jones comes into contact with a civil servant who does not do what he wants the minute he wants it, a tirade ensues and all are declared biased, racist, and prejudicial. The same is true of the judiciary. His obstructionist techniques cause justice to be delayed for countless others who have legitimate controversies to bring before the court. By way of example, on June 28, 2018, Jones, while before Hon. Anthony N. Gallina, P.J.M.C., threatened more filings against Teaneck's Health Officer Ken Katter stating:

[Katter] had an obligation to enforce the health codes and he did not. There's continuing things going on today. We'll probably be right back here in a month or so; I'm going to file new complaints and there will be additional evidence forthcoming and proofs. And additional paperwork. You want paperwork? I'll bring it, and lots of it. So, I'm here today to advise Ken Katter, you failed to do your job and you continue to fail to do your job. And as you continue to fail to do your job these charges will be continued.

State v. Ken Katter, oral argument, June 20, 2018, at 11:19 a.m.

Suffice it to say, Jones' actions patently demonstrate a willful desire to abuse the judicial process and absorb precious state and judicial resources. His use of the judicial system is intended to spite others, and to punish anyone, including court staff who do not act as he directs. This is not the intended purpose of the judiciary and his actions are intolerable. This Court finds these complaints to be aggrandized and devoid of a realistic appreciation of the court process.

As Hon. Peter J. Melchionne, P.J.F.P., aptly noted in his March 20, 2018, oral opinion: "There is a commonality that flows through this case... this case is really about [Jones and Alston's] dispute with each other over their mother." Oral Opinion at 12:27.

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“The parties engage in extreme gamesmanship with the judiciary system... [t]hey wish to inconvenience all for their own self-gain, and [sic] not to assist this court in rendering a decision.” Id. at 12:24.

In his opposition, Jones states, “[t]o walk in my shoes one would understand the reason for my need to file a large number of complaints because a large number of criminal actions have been done to me.” Jones Opposition, at 8. The Court strains to understand how a driver of a vehicle, who has no front, and/or rear license plate showing in violation of N.J.S.A. § 39:3-33 as alleged by Jones on April 17, 2018, in State v. Harold Clark, SC-2018-007966 has in any way impacted Jones.

Traditional sanctions would not be efficacious against Jones. The Court notes that Jones claims to be indigent; he often requests waiver of fees from the judiciary because of his alleged indigent status. Most recently, on May 11, 2018, Jones made a motion before Hon. Peter J. Melchionne, P.J.F.P. in Elie C. Jones v. Teresa A. Alston, Docket No. FV-02-675-18 to waive appellate CD and transcript fees due to indigency¹². While making no findings regarding Jones’ current state of indigency or lack thereof, the Court is convinced that traditional sanctions would not be effective against Jones based upon words contained in his written opposition and reiterated at oral argument:

I will continue to seek justice through the courts and if my rights are circumvented and or restricted-other avenues of justice are available to me at my disposal and **I will never be deterred from seeking my due process rights** (emphasis added). As Malcom [sic] X once said- By any means necessary. And Martin Luther King said I have a Dream. And my brother Jesse Jackson says “keep hope alive” and no justice no peace. These are words to live by

¹² Hon. Peter J. Melchionne, P.J.F.P. denied Jones’ application without prejudice. Judge Melchionne found that Jones did not supply the court with a sufficient application, as it lacked supporting financial documentation to show his indigency.

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and never give up on the prospect of justice, equality and true liberty.

[Jones Opposition at 12].

Jones also stated “[i]f I cannot seek judicial action in way of criminal complaints as the procedure [sic] I will have to resort to alternative means of justice and resolving crimes committed by the defendants by any means necessary as brother Malcom [sic] X once truly stated. Peace be unto him.” Id. at 17.

He has used the courts to further his cause and has made clear in the preceding quote that he will use any means necessary to further his perceived quest for individual justice.

The court finds that he will not be deterred from continued filings if such filings are not filtered and the issuance of process restrained and enjoined.

Moreover, the Court finds it necessary to note Jones’ inconsistency in that any order entered which filters his ability to file complaints is a “violation of [his] Due Process Right... [that] should not be disturbed or restricted...” Jones Opposition, at 15. Ironically, in a similar injunctive proceeding involving Jones’ sister, Alston, Jones fully supported and even lobbied this Court to place the same filters in place against his sister.

Alston Oral Argument, at 10:46.

The Court finds that it would not be “preferable that [Jones’] complaint[s] be filed [first], and the Assignment Judge... enjoin the issuance of a summons pending review.” Rosenblum, supra, at 392 n.2. Allowing Jones to file first and then seek the Assignment Judge’s review would provide no relief to the municipal courts. The copious complaint filings would persist and would continue to have a crippling effect on judicial operations.

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Pursuant to R. 1:33-4(a), the Assignment Judge has the plenary responsibility for the administration of the courts within the vicinage. Under R. 1:33-4(b), she is responsible for the efficient and economic managements of all courts within the vicinage and is responsible under R. 1:33-4(c) for supervision and efficient management of all court matters filed in the vicinage. Given that solemn and heavy responsibility and for all the foregoing reasons, Elie C. Jones, is prohibited from filing any criminal, quasi-criminal, civil and/or municipal code violations within the State of New Jersey unless and until said complaint has been reviewed and approved for filing by the Assignment Judge of Bergen County. After review, the Assignment Judge shall determine whether to reject frivolous or abusive filings designed to absorb precious state and judicial resources or whether a meritorious claim exists.

Notwithstanding these restraints, Jones shall be permitted to file any application for relief under the Prevention of Domestic Violence Act N.J.S.A. 2C:25-17 et. seq. without filter.

Public Access to Court

Jones' incessant and overly burdensome presence in the courthouse has long been problematic. As discussed above, when in the courthouse, Jones is rude, disrespectful, inconsiderate, he often yells, and uses profanity when interacting with staff. His antics are nothing short of deplorable. As previously recounted, in January 2016 TCA Simoldoni was appointed as Jones' liaison to the chancery division. This measured response followed Jones pounding his fist against the chancery customer service window, screaming and using profanity.

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By way of example, the court outlines a selection of in-person interactions with Jones.

- December 27, 2016- Jones laughed and made faces at TCA Simoldoni, said he would sue her, the courts, the county, law enforcement, and Judge Contillo for pain and suffering regarding filing fees.
- December 30, 2016- TCA Simoldoni memorialized Jones' inappropriate behavior by his commenting "You (TCA Simoldoni) are wearing a skirt. I like the way you look in a skirt. You have nice legs. You should wear skirts more often." The interaction continued when Jones requested TCA Simoldoni to obtain three (3) specific pro se forms for him. Upon her return from obtaining such forms, Jones requested more forms. When TCA Simoldoni asked why Jones had not asked for the forms earlier Jones replied "Look, girl, you are still on the clock. Go get the forms, now!" TCA Simoldoni closed the letter with a request that Jones not make further comments about her appearance or clothing as she found the comment to be inappropriate and offensive.
- On the morning of June 5, 2017, Jones appeared at TCA Simoldoni's office on four (4) occasions
- In a March 2, 2018, letter to Jones, TCA Simoldoni recounted that between December 2016 and February 28, 2018, Jones scheduled fifty-five (55) in person appointments with her. Of those, Jones failed to appear twenty-four (24) times without notice or explanation.

As further example of the burdensome attention Jones requires due to his demands and utter disregard for courthouse staff's time, in a flurry of emails

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beginning on May 1, 2018, at 2:55 p.m. Jones demanded TCA Simoldoni schedule an appointment for him on May 2, 2018, to make an “emergent [domestic violence] restraining order” application. Within two hours, TCA Simoldoni responded and informed Jones that it was after 3:30 p.m. “... and since this is an emergent matter, please go to your local police department and they will take your TRO application there and you will meet with the municipal judge immediately.”

Despite the purported immediacy of the matter, on May 3, 2018, nearly 48 hours after his initial email, Jones’ response stated that he was directed to go to the Superior Court due to “conflicts of interest.” and again commanded TCA Simoldoni schedule an appointment, and threatened to take “additional further action for [her] failure or failures to follow court rules and procedures.”

Soon thereafter, TCA Simoldoni informed Jones that she would be available for him to come in on May 3, 2018, at 2:00 p.m. or May 4, 2018, at 9:00 a.m. or 2:00 p.m. Jones scheduled his appointment for May 4, 2018, at 9:30 a.m. On May 4, 2018, at 11:33 a.m. two hours after he failed to appear for his scheduled appointment without notice, Jones sent an unsolicited email to TCA Simoldoni insisting he previously informed TCA Simoldoni that he was sick, unable to make his appointment. Once again, he demanded an appointment, this time on May 7, 2018, or May 8, 2018. In response Jones was advised that no voicemail, email, or fax was received advising that he was unable to make the appointment. TCA Simoldoni noted that it was the seventh time in 2018 that Jones made an appointment with her, failed to appear and failed to give her prior notice that he would not appear.

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The Judiciary's imposition of restriction on Jones' access to the courthouse as a non-litigant is constitutionally permissible to the extent it is reasonable and not based on the views expressed by Jones. As the Second Circuit Court noted in Huminski v. Corsones, 386 F.3d 116 (2d Cir. 2004), a state court has a legitimate interest to "protect person, property, and judicial proceedings... [and] [t]o serve that interest adequately, court administrative, judicial, and other officials must at least have the ability to close the courtroom door to any person whom they reasonably think may pose a threat to person, property, or decorum." Huminski, 386 F.3d at 149. When in the courthouse, Jones is rude, yells, uses profanity, and is inconsiderate of court employee time and resources. As noted by Hon. Peter J. Melchionne, P.J.F.P. in his March 20, 2018, oral opinion in addressing both Jones and Alston's behavior to judiciary staff Judge Mechionne opined:

It is clear that the way... [Jones and Alston] conduct [themselves] to each other is less than model. You conduct yourselves similarly to anyone you encounter, particularly here at the courthouse. The minute a staff member may not provide you what you asked for, or looks at you funny, or asks you to wait, your conduct becomes less than appropriate. Similarly, that's how you treat each other.

The behavior you exhibit in the courtroom in front of me and at me and at the Sheriff's officers here is deplorable. When I enter an unfavorable ruling, I become the target of being biased, racist, I'm accused of pre-judging the case.

Id. at 12:31.

Prohibition of access to Jones is reasonable insofar as it is motivated by the Court's desire to preserve the decorum and integrity of the court by eliminating Jones' abusive and inappropriate conduct from its premises.

Similarly, the Judiciary's imposition of restriction on Jones' access to the courthouse as a litigant is constitutionally permissible. The Judiciary's restriction is not a

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deprivation of Jones' right of access to the courts, it is merely a filter to protect the court's administrative, judicial, and sheriff's staff from future abuse.

Jones' entry to the Bergen County Courthouse is conditioned on his production of a notice of hearing. This is not a deprivation of his rights, but rather a measured response and nothing more than a minor inconvenience which serves to protect the court's administration, judiciary, and sheriff's staff as well as other litigants with valid claims.

TCA Simoldoni Removal as Jones' Courthouse Liason

Jones has long taken the position that a new liaison should be appointed. He makes unsupported allegations of bias, intimidation, retaliatory conduct, harassment, and racism by court staff. In a May 3, 2018, email to TCA Simoldoni to make an appointment to file a domestic violence complaint, Jones requested an "alternate [liaison] as [TCA Simoldoni is] conflicted now that criminal charges are pending against [her]."

Email from Elie C. Jones to TCA Laura Simoldoni, (May 3, 2018, 11:39 a.m.). His written opposition asserts that "the Trial Court Administrator requires removal due to a serious conflict of interest, failures to stem employee misconduct and simple assault Elie C. Jones." Jones Opposition, at 14. These arguments were reiterated during oral argument.

Hon. Bonnie J. Mizdol, A.J.S.C. is tasked with investigating all such claims against TCA Simoldoni. All of Jones' claims have been found to be meritless. TCA Simoldoni responds to all correspondence within 24 hours; many times responding within two hours. She schedules time to meet with Jones and escort him to departments within the courthouse. Due to her role as liaison, she often communicates with departments gathering information requested by Jones in a conscientious and timely manner. TCA

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Simoldoni's liaison duties have made more difficult by Jones' abusive comments about her appearance, insistence that she is his assistant and general rude demeanor towards her during interactions. Despite this, TCA Simoldoni has been nothing but courteous and professional toward Jones. This Court opines that TCA Simoldoni has gone beyond the call of duty in conducting herself with the utmost professionalism, without an inkling of impropriety.

For these reasons, the Court declines to appoint Jones a new liaison.

Dismissal of Pleadings for Impropriety

The motives of pro se plaintiffs who abuse the courts are "often varied as the individuals themselves." 18 U. Mich. J.L. Reform 93, 97-98 (1984) (quoting Truax v. Corrigan, 257 U.S. 312, 332, 42 S. Ct. 124, 129, 66 L. Ed. 254, 263 (1921)). Often their aim is to exact reprisal against the judicial system, including judges, lawyers, and court personnel. Id. at 107. At other times, "the plaintiff's immediate goal [is] to clog the court's docket in an attempt to disrupt the orderly administration of the courts and impede the judicial machinery." Ibid. More often than not, their objective is to engage in vexatious and confounding litigation against private parties with whom they have had disputes. Id. at 108.

Frivolous litigation has had a deleterious effect on the judicial system and the public interest. Most obviously, frivolous pro se litigants absorb a considerable amount of judicial resources and cause and prolong the delay of adjudication of meritorious lawsuits. Id. at 112. Several consequences of such delays have been identified. First, "[a]s caseloads increase, judges have less time to devote to each case," which "threatens the quality of justice." Id. at 113. Second, "long delays in adjudication create public

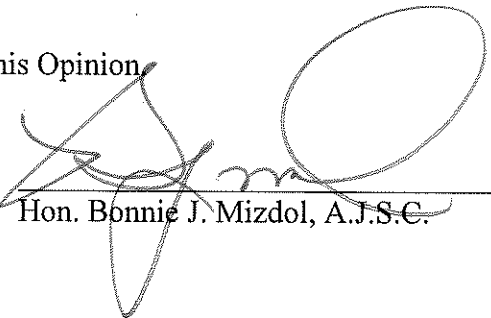
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dissatisfaction and frustration with the courts,” which ultimately “breeds disrespect for the law.” Id. at 114. Third, unchecked abusive litigation prolongs the harassment of defendants. Ibid. Fourth, “excessive litigation against certain individuals or groups of individuals may deny them fair access to the judicial process.” Ibid. These consequences demonstrate the judiciary’s strong interest in deterring and protecting against the burdens of repetitious, frivolous litigation. Ibid.

Jones’ intentional abuses, characterized by his frequent and incessant complaint filings have had a demonstrable deleterious effect on the Teaneck Municipal Court, our Vicinage II Municipal Court, and the Bergen and Passaic Superior Courts as well as the litigants they serve.

The Court finds that Jones’ complaints have had, and if allowed to remain, will continue to have a deleterious effect on the operations and services provided by our Bergen Vicinage II Municipal Court, the Township of Teaneck Municipal Court, the Bergen and Passaic Superior Courts. Jones has clogged these courts’ dockets in an attempt to disrupt the orderly administration of courts. He has denied those with legitimate claims fair access to the judicial process. As such, and as permitted by R. 4:6-4 the Court dismisses without prejudice pursuant to R. 4:37-2(a) any civilian-criminal complaints filed by Jones from January 1, 2018, through the date of the Order attached hereto.

A conforming Order accompanies this Opinion.



Hon. Bonnie J. Mizdol, A.J.S.C.

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EXHIBIT

A

1. **THAT** Plaintiff's Notice of Motion to allow two weeks for service of 10-15 subpoenas after witnesses are approved is **DENIED**.
2. **THAT** Plaintiff's Notice of Motion to assistance from Bergen County IT to play CD/Video at trial is **DENIED**.
3. **THAT** Plaintiff's Notice of Motion to order all witnesses be sequestered during trial to avoid witness tampering is **DENIED**.
4. **THAT** Plaintiff's Notice of Motion to allow Plaintiff to have private security to keep Plaintiff protected while within the Court is **DENIED**.
5. **THAT** Plaintiff's Notice of Motion to provide Plaintiff with a copy of the Domestic Violence Guidelines Manual and Court Rules and Procedures that are followed by the Court and the Presiding Judge of the Family Division is **WITHDRAWN**.
6. **THAT** Plaintiff's Notice of Motion to in the event an FRO is granted, Order a maximum civil penalty of \$500.00 to Defendant is **DENIED**.
7. **THAT** Plaintiff's Notice of Motion to in the event an FRO is granted, Order a Risk Assessment of Defendant is **DENIED**.

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8. **THAT** Plaintiff's Notice of Motion to in the event an FRO is granted, Order a psychiatric evaluation of Defendant is **DENIED WITHOUT PREJUDICE**.
9. **THAT** Plaintiff's Notice of Motion to in the event an FRO is granted, keep all relief in TRO in FRO including protected parties prohibitions and add ordered evaluations is **DENIED WITHOUT PREJUDICE**.
10. **THAT** Plaintiff's Notice of Motion to in the event an FRO is granted, determine intake monitoring, conditions, and restraints is **DENIED WITHOUT PREJUDICE**.
11. **THAT** Plaintiff's Notice of Motion to in the event an FRO is granted, Order depression evaluation and evaluate Defendant's ability to care for a minor under the FRO conditions is **DENIED WITHOUT PREJUDICE**.
12. **THAT** Plaintiff's Notice of Motion to in the event an FRO is granted, prohibit Defendant from possessing weapons is **DENIED WITHOUT PREJUDICE**.
13. **THAT** Plaintiff's Notice of Motion to in the event an FRO is granted, Order punitive damages against Defendant is **DENIED WITHOUT PREJUDICE**.
14. **THAT** Plaintiff's Notice of Motion to in the event an FRO is granted, provide counseling for Plaintiff is **DENIED WITHOUT PREJUDICE**.



HON. PETER J. MELCHIONNE, P.J.F.P.

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EXHIBIT

B

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SUPERIOR COURT OF NEW JERSEY
BERGEN COUNTY
CHANCERY DIVISION: FAMILY PART

Prepared by the Court

TERESA A. ALSTON	:	CIVIL ACTION
	:	
Plaintiff,	:	ORDER
v.	:	
	:	
ELIE C. JONES	:	DOCKET NO.: FV-02-678-18
Defendant,	:	
	:	

FILED

MAR 12 2018

PETER J. MELCHIONNE, P.J.F.P.

THIS MATTER, having come before the Court on Notice of Motion by Plaintiff, Teresa A. Alston, appearing Pro Se, and opposed by Defendant, Elie C. Jones, appearing Pro Se, and the Court having read and considered the moving papers, certifications on file, the arguments of the party, for other good cause shown, and for the reasons set forth;

IT is on this 12th day of March 2018, ORDERED:

1. **THAT** Plaintiff's Notice of Motion to halt Defendant's repeated filings of criminal complaints related to the TRO is **DENIED**.
2. **THAT** Plaintiff's Notice of Motion to deny telephonic testimony of Cerise Gibbs is **MOOT**.
3. **THAT** Plaintiff's Notice of Motion to grant Plaintiff indigency status to allow Plaintiff to receive discovery on all incidents that took place in the Bergen County Justice Center is **DENIED**.
4. **THAT** Plaintiff's Notice of Motion to dismiss all charges related to 11/06/17 and 11/15/17 is **DENIED**.
5. **THAT** Plaintiff's Notice of Motion to order Defendant to pay \$891.00 pursuant to the Court's Order is **DENIED**.
6. **THAT** Plaintiff's Notice of Motion to hold Defendant in contempt for perjury is **DENIED**.
7. **THAT** Plaintiff's Notice of Motion to deny Defendant indigency status is **DENIED**.

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8. **THAT** Plaintiff's Notice of Motion to deny all relief being sought by Defendant is **GRANTED.**
9. **THAT** Plaintiff's Notice of Motion to order a psychiatric evaluation of Defendant is **DENIED.**



HON. PETER J. MELCHIONNE, R.J.F.P.

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EXHIBIT

C

STATE V. TERESA ALSTON

COMPLAINTS #	STATUS	COMPLAINANT	REMARKS	MUNICIPAL COURT	DATE FILED	CHANGE	DESCRIPTION
1	S 2016 001592	Case Management Conference	Elie Jones	Dismissed - 2/22/18	Hackensack	12/15/2016	2C33-4 Harassment
2	S 2016 001593	Case Management Conference	Elie Jones	Dismissed - 2/22/18	Hackensack	11/15/2016	2C35-2A(1) CONSPIRACY - AGREE/ENGAGE IN CONDUCT CONSTITUTE A CRIME
3	S 2017 000096	Case Management Conference	Elie Jones	Dismissed - 2/22/18	Hackensack	1/23/2017	2C35-2A(2) CONSPIRACY - AGREE/AID IN CONDUCT CONSTITUTE A CRIME
4	S 2017 000926	Probable Cause Hearing	Elie Jones	Dismissed - 2/22/18		10/5/2017	2C33-4A HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
5	S 2017 000600	Probable Cause Hearing	Elie Jones	Dismissed - 2/22/18	Teaneck	11/15/2017	2C33-2A(1) DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
6	S 2017 000601	Probable Cause Hearing	Elie Jones	Dismissed - 2/22/18	Hackensack	11/21/2017	2C33-4E TERRORISTIC THREATS-THREATEN IMMINENT DEATH-PURP FEAR
7	S 2017 001054	Probable Cause Hearing	Elie Jones	Dismissed - 2/22/18		2C33-4A	2C33-4B HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
8	S 2017 001059	Probable Cause Hearing	Elie Jones	Dismissed - 2/22/18	Hackensack	11/21/2017	2C33-4E HARASSMENT-STRIKING/OFFENSIVE TOUCHING/THREATS TO
9	S 2017 001060	Probable Cause Hearing	Elie Jones	Dismissed - 2/22/18	Hackensack	11/21/2017	2C33-2A(1) DISORDERLY CONDUCT-IMPROP BEHAV-CREATE HAZARDOUS COND
10	S 2017 001056	Probable Cause Hearing	Elie Jones	Dismissed - 2/22/18	Hackensack	11/21/2017	2C33-2B DISORDERLY CONDUCT-OFFENSIVE LANGUAGE
11	S 2017 000611	Probable Cause Hearing	Elie Jones	Dismissed - 2/22/18		11/22/2017	2C33-4A HARASSMENT WHILE IMPRISONED OR ON PAROLE/PROBATION
12	S 2018 000021	Probable Cause Hearing	Elie Jones		Hackensack	1/11/2018	2C33-4E HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
13	S 2018 000108	Probable Cause Hearing	Elie Jones		Hackensack	2/12/2018	2C33-2A FALSE SWEARING - FALSE STATEMENT UNDER OATH
14	S 2018 000109	Probable Cause Hearing	Elie Jones		Hackensack	2/12/2018	2C33-2A FALSE SWEARING - FALSE STATEMENT UNDER OATH
15	S 2018 000110	Probable Cause Hearing	Elie Jones		Hackensack	2/12/2018	2C33-4C HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
16	S 2018 000140	Probable Cause Hearing	Elie Jones		Hackensack	2/23/2018	2C33-4A HARASSMENT-ANY OTHER ALARMING CONDUCT

							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
17	S 2018 000141	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	2/29/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
							2C29-9B(1)	CONTEMPT - VIOLATE BY ORDER BY CRIME OR DP OFFENSE
							2C29-9B(2)	CONTEMPT - VIOLATION OF RESTRAINING ORDER
							2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
							2C33-2A(2)	DISORDERLY CONDUCT-IMPROP BEHAV-CREATE HAZAROUS CONDT
18	S 2018 000095	Probable Cause Hearing	Elie Jones	New 2018	Teaneck	2/28/2018	2C12-10C	STALKING
							2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
							2C29-9B(1)	CONTEMPT - VIOLATE BY ORDER BY CRIME OR DP OFFENSE
19	S 2018 000102	Probable Cause Hearing	Elie Jones	New 2018	Teaneck	3/1/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
							2C29-9B(2)	CONTEMPT - VIOLATION OF RESTRAINING ORDER
20	S 2018 000155	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/6/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C33-4E	HARASSMENT WHILE IMPRISONED OR ON PAROLE/PROBATION
							2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
							2C38-1A	PURJURY
							2C29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
21	S 2018 000156	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/6/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C29-9B(2)	CONTEMPT - VIOLATION OF RESTRAINING ORDER
							2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
							2C33-2A(2)	DISORDERLY CONDUCT-IMPROP BEHAV-CREATE HAZAROUS CONDT
22	S 2018 000157	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/6/2018	2C29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
							2C29-9B(1)	CONTEMPT - VIOLATE BY ORDER BY CRIME OR DP OFFENSE
							2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
							2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
23	S 2018 000158	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/6/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C29-9B(1)	CONTEMPT - VIOLATE BY ORDER BY CRIME OR DP OFFENSE
							2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C29-9B(1)	CONTEMPT - VIOLATE BY ORDER BY CRIME OR DP OFFENSE
							2C29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
							2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C29-9B(1)	CONTEMPT - VIOLATE BY ORDER BY CRIME OR DP OFFENSE
							2C29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
							2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
24	S 2018 000159	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/6/2018	2C29-9B(1)	CONTEMPT - VIOLATE BY ORDER BY CRIME OR DP OFFENSE
							2C29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRAINING ORDER
25	S 2018 000160	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/6/2018	2C33-2B	DISORDERLY CONDUCT-OFFENSIVE LANGUAGE
							2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
							2C33-2B	DISORDERLY CONDUCT-OFFENSIVE LANGUAGE
26	S 2018 000108	Probable Cause Hearing	Elie Jones	New 2018	Teaneck	3/6/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC

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27	S 2018 000111	Probable Cause Hearing	Elie Jones	New 2018	Teaneck	3/8/2018	2C5-2A(1)	CONSPIRACY - AGREE/ENGAGE IN CONDUCT CONSTITUTE A CRIME
							2C28-4B(1)	CONSPIRACY - AGREE/AID IN CONDUCT CONSTITUTE A CRIME
							2C5-2A(2)	CONSPIRACY - AGREE/AID IN CONDUCT CONSTITUTE A CRIME
28	S 2018 000109	Probable Cause Hearing	Elie Jones	New 2018	Englewood	3/8/2018	2C5-2A(1)	CONSPIRACY - AGREE/ENGAGE IN CONDUCT CONSTITUTE A CRIME
							2C28-1A	PERJURY
29	S 2018 000109	Probable Cause Hearing	Elie Jones	New 2018	Teaneck	3/9/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C33-4E	HARASSMENT WHILE IMPRISONED OR ON PAROLE/PROBATION
							2C28-2A	FALSE STATEMENT UNDER OATH
							2C28-4A	FALSE REPTS TO LAW ENFOR-FALSY INCR OTH-NOT 1 OR 2 DEG
							2C28-4B(1)	FALSE REPT TO LAW ENFOR-FICT RPT-REPORT FALSE INCIDENT
							2C28-1A	PERJURY
30	S 2018 000126	Probable Cause Hearing	Elie Jones	New 2018	Teaneck	3/14/2018	2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C29-9B(1)	CONTEMPT - VIOLATE DV ORDER BY CRIME OR DP OFFENSE
							2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
31	S 2018 000126	Probable Cause Hearing	Elie Jones	New 2018	Teaneck	3/14/2018	2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C29-9B(1)	CONTEMPT - VIOLATE DV ORDER BY CRIME OR DP OFFENSE
							2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
32	S 2018 000199	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/15/2018	2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
							2C33-8	DISRUPTING MEETING AND PROCESSIONS
							2C33-2B	DISORDERLY CONDUCT-OFFENSIVE LANGUAGE
							2C33-4E	HARASSMENT WHILE IMPRISONED OR ON PAROLE/PROBATION
33	S 2018 000200	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/15/2018	2C16-1A(1)	BIAS INTIMIDATION
							2A10-1A	WHAT CONSTITUTES CONTEMPT IN GENERAL MISBEHAVIOR PRESENCE OF THE COURT
34	S 2018 000201	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/15/2018	2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
							2C28-1A	PERJURY
							2C29-1A	ADMINISTRATIVE OBSTRUCTION OF LAW
35	S 2018 000202	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/15/2018	2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
							2C28-1A	PERJURY
36	S 2018 000206	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/15/2018	2C28-1A	ADMINISTRATIVE OBSTRUCTION OF LAW
							2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
							2C28-4A	FALSE REPTS TO LAW ENFOR-FALSY INCR OTH-NOT 1 OR 2 DEG
							2C28-4B(1)	CONSPIRACY - AGREE/AID IN CONDUCT CONSTITUTE A CRIME
							2C28-4B(2)	FALSE REPORT TO LAW ENFORCEMENT
37	S 2018 000207	Probable Cause Hearing	Elie Jones	New 2018	Hackensack	3/15/2018	2C28-1A	PERJURY
							2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
							2C28-4A	FALSE REPTS TO LAW ENFOR-FALSY INCR OTH-NOT 1 OR 2 DEG
							2C28-4B(1)	CONSPIRACY - AGREE/AID IN CONDUCT CONSTITUTE A CRIME
							2C28-4B(2)	FALSE REPORT TO LAW ENFORCEMENT
38	S 2018 000144	Probable Cause Hearing	Elie Jones	New 2018	Teaneck	3/23/2018	2C28-5A(1)	WITNESS TAMPERING-TO CAUSE FLS TESTIMY-NO NERA/FORCE
							2C28-5B	WITNESS TAMPERING-RET AGAINST WITNESS-NO FORCE/THREAT
39	S 2018 000151	Probable Cause Hearing	Elie Jones	New 2018	Englewood	4/13/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C2-6A	ACCOMPLICE LIABILITY-OWN CONDUCT/CONDUCT OF OTHER-1 DEG
							2C5-2	AUXILIARY OFFENSE
							2C2-6A	ACCOMPLICE LIABILITY-OWN CONDUCT/CONDUCT OF OTHER-1 DEG
							2C5-2	AUXILIARY OFFENSE

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					4/13/2018	2C2-5A	ACCOMPLICE LIABILITY-OWN CONDUCT/CONDUCT OF OTHER-1 DEG
					4/13/2018	2C3-2	AUXILIARY OFFENSE
40	S 2018 000277	Probable Cause Hearing	Elie Jones	New 2018	4/20/2018	2C27-5	RETRIBUTION FOR PAST OFFICIAL ACTION
41	S 2018 000278	Probable Cause Hearing	Elie Jones	New 2018	4/20/2018	2C28-4A	FALSE REPTS TO LAW ENFOR-FALSLY INCR OTH-NOT 1 OR 2 DEG
42	S 2018 000196	Probable Cause Hearing	Elie Jones	New 2018	4/20/2018	2C28-1A	PERJURY
					4/20/2018	2C28-4B(1)	CONSPIRACY - AGREE/AID IN CONDUCT CONSTITUTE A CRIME
					5/1/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT

STATE V. ELIE JONES - Public Defender - Matthew Seymour, Esq.							
COMPLAINTS #	STATUS	COMPLAINANT	REMARKS	MUNICIPAL COURT	DATE FILED	CHARGE	DESCRIPTION
43	S 2016 001219	TRIAL	Barbara Clayton	Hackensack	9/20/2016	2C12-1A(1)	SIMPLE ASSAULT-PURPOSELY/KNOWINGLY CAUSE BOD INJURY
44	S 2017 000605	Probable Cause Hearing	Teresa Alston	Teaneck	11/16/2017	2C29-9B(2)	CONTEMPT - VIOLATE DOMESTIC VIOLENCE RESTRAINING ORDER
						2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
						2C29-9B(2)	HARASSMENT-ANY OTHER ALARMING CONDUCT
45	S 2018 000033	Probable Cause Hearing	Teresa Alston	Hackensack	1/12/2018		CONTEMPT - VIOLATE DOMESTIC VIOLENCE RESTRAINING ORDER
			PC Found- 2/22/18 Transferred to Fam Div, restraining order				
46	S 2018 000034	Probable Cause Hearing	Teresa Alston	Hackensack	1/12/2018	2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
47	S 2018 000045	Probable Cause Hearing	Teresa Alston	Hackensack	1/18/2018	2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
			New 2018			2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
			New 2018			2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
			New 2018			2C33-4B	HARASSMENT-STRIKING/OFFENSIVE TOUCHING/THREATS TO
48	SC 2018 011335	Trial	Barbara Clayton	Englewood	2/9/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
			New 2018			2C12-10B	
49	S 2018 000068	Probable Cause Hearing	Barbara Clayton	Teaneck	2/13/2018		STALKING-ENGAGE CONDUCT REASONABLE PERSON PUT IN FEAR
			2 counts dismissed - 2/22/18 ; 1 count back for trial			2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
			Dismissed - 5/14/18			2C16-1A(1)	BIAS INTIMIDATION-UNDERLYING OFFENSE-PP-PURPOSE
50	S 2018 000069	Probable Cause Hearing	Barbara Clayton	Teaneck	2/13/2018	2C21-4A	TAMPERING WITH RECORDS-DESTROY/REMOVE CONCEAL RECORD ETC
			Dismissed - 2/22/18			2C28-4B(1)	FALSE REPT TO LAW ENFOR-FICT RPT-REPORT FALSE INCIDENT
51	S 2018 000101	Probable Cause Hearing	Teresa Alston	Hackensack	2/19/2018	2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
			New 2018			2C33-2B	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
						2C33-2B	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
						2C29-9A	DISORDERLY CONDUCT-OFFENSIVE LANGUAGE
						2C12-10C	CONTEMPT-VIOLATE DOMESTIC VIOLENCE RESTRAINING ORDER
						2C29-9A	CONTEMPT-VIOLATE DOMESTIC VIOLENCE RESTRAINING ORDER
						2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C33-4B	HARASSMENT-STRIKING/OFFENSIVE TOUCHING/THREATS TO
52	S 2018 000131	Probable Cause Hearing	Teresa Alston	Hackensack	2/22/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
			New 2018			2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
						2C12-10C	STALKING-STALKING IN VIOLATION OF COURT ORDER
						2C29-9A	CONTEMPT-VIOLATE JUDICIAL/RESTRANING ORDER
53	PP 056640	Trial	Ofc. H. Clark	Teaneck	3/5/2018	2C29-9B(2)	CONTEMPT - VIOLATE DOMESTIC VIOLENCE RESTRAINING ORDER
			Dismissed 5/21/18			BORO. ORD. 1139	COUNCIL MEMBERS ONLY
54	S 2018 000242	Probable Cause Hearing	Barbara Clayton	Hackensack	3/29/2018	2C12-1A (1)	SIMPLE ASSAULT-PURPOSELY/KNOWINGLY CAUSE BOD INJURY

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55	EL18 006982	Probable Cause Hearing	Off. Paul Kearns	New 2018		2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
56	EL18007869	Probable Cause Hearing	P.O.P. Hease	CV 034-18	Hackensack	36-32.15(f)	NO PKG WHITE PAINTED UNE
57	PP 056131	Probable Cause Hearing	P.O.S. Moreno	CV 034-18	Teaneck	39-3-70.2	AIR POLLUTION (EMISSION OF SMOKE OR CONTAMINANTS)
58	SC 2018 007393	Probable Cause Hearing	P.O.P. Kearns	CV 034-18	Teaneck	39-4-33	PEDESTRIAN- USE DESIG CROSSWALK/KEEP RIGHT
STATE V. FLORENDA JONES							
	COMPLAINTS #	STATUS	COMPLAINANT	REMARKS	MUNICIPAL COURT	CHARGE	DESCRIPTION
59	S 2017 001055	Probable Cause Hearing	Elie Jones	Adj.	Hackensack	2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
				PC found 2/22/18; schedule for Trial; Dismissed 05/14/18			
				Dismissed 5/14/18		2C33-2A(2)	DISORDERLY CONDUCT-IMPROP BEHAV-CREATE HAZARDOUS CONDT
						2C33-2B	DISORDERLY CONDUCT-OFFENSIVE LANGUAGE
STATE V. VICKIE JONES							
	COMPLAINTS #	STATUS	COMPLAINANT	REMARKS	MUNICIPAL COURT	CHARGE	DESCRIPTION
60	S 2017 000621	Case Management Conference	Elie Jones	Adj.	Hackensack	2C28-3B(5)	UNSWORN FALSEICTN AUTH-FORGED/ALTERED WRITING
				DP clarification 2/22/18; reschedule for Trial		2C28-3B(1)	UNSWORN FALSEICTN AUTH-FALSE WRITING TO MISLEAD PUB SRV
61	S 2018 000071	Probable Cause Hearing	Elie Jones	CV 034-18	Hackensack	2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
						2C28-1A	PERJURY

STATE V. BARBARA CLAYTON							
	COMPLAINTS #	STATUS	COMPLAINANT	REMARKS	MUNICIPAL COURT	CHARGE	DESCRIPTION
62	S 2018 000047	Probable Cause Hearing	Elie Jones	Dismissed 5/14/18	Teaneck	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C33-4B	HARASSMENT-STRIKING/OFFENSIVE TOUCHING/THREATS TO
						2C12-10B	STALKING-ENGAGE CONDUCT REASONABLE PERSON PUT IN FEAR
63	S 2018 000076	Probable Cause Hearing	Elie Jones	Dismissed 6/20/18	Teaneck	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
				Dismissed 6/20/18		2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
				PC Found 6/20/18	Teaneck	39-4-89	STALKING-ENGAGE CONDUCT REASONABLE PERSON PUT IN FEAR
64	SC 2018 007304	Probable Cause Hearing	Elie Jones	PC Found 6/20/18	Teaneck	39-4-97	FOLLOWING TOO CLOSELY
65	SC 2018 007305	Probable Cause Hearing	Elie Jones	PC Found 6/20/18	Teaneck	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
66	S 2018 000083	Probable Cause Hearing	Elie Jones	Dismissed 6/20/18	Teaneck	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
				Dismissed 6/20/18		2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
				Dismissed 6/20/18		2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
				Dismissed 6/20/19		2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
				Dismissed 6/20/18		2C28-4B(1)	FALSE REPT TO LAW ENFOR-FACT RPT-REPORT FALSE INCIDENT
				Dismissed 6/20/18		2C28-1A	PERJURY
				Dismissed 6/20/18		2C21-4A	TAMPERING WITH RECORDS-DESTROY/REMOVE CONCEAL RECD ETC
				Dismissed 6/20/18		2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
				Dismissed 6/20/18		2C28-4B(2)	FALSE REPORT TO LAW ENFORCEMENT
				Dismissed 6/20/18		2C5-2A(1)	CONSPIRACY - AGREE/ENGAGE IN CONDUCT CONSTITUTE A CRIME
				Dismissed 6/20/18		2C28-4A	FALSE REPTS TO LAW ENFOR-FALSIV INCR OTH-NOT 1 OR 2 DEG
67	SC 2018 007308	Probable Cause Hearing	Elie Jones	No PC Dismissed 6/22/18	Teaneck	39-3-74	OBSTRUCTION OF VIEW
68	SC 2018 007309	Probable Cause Hearing	Elie Jones	PC Found 6/22/18	Teaneck	39-3-74	OBSTRUCTION OF VIEW
69	S 2018 000101	Probable Cause Hearing	Elie Jones	Dismissed 6/22/18	Teaneck	2C12-10B	STALKING-ENGAGE CONDUCT REASONABLE PERSON PUT IN FEAR

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70	S 2018 000102	Probable Cause Hearing	Elie Jones	Adl.	Englewood	3/3/2018	2C-28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
							2C-28-1A	PERJURY
							2C-28-4A	FALSE REPTS TO LAW ENFOR-FALSY INCR OTH-NOT 1 OR 2 DEG
							2C-28-4B(1)	CONSPIRACY - AGREE/AID IN CONDUCT CONSTITUTE A CRIME
							2C-28-4B(2)	FALSE REPT TO LAW ENFOR-FICT RPT-REPORT W/O KNOWLEDGE
71	S 2018 000154	Probable Cause Hearing	Elie Jones	PC Found 6/22/18	Hackensack	3/6/2018	2C-33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
				Dismissed 6/22/18			2C-33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
				PC Found 6/22/18			2C-33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
				Dismissed 6/22/18			2C-33-2B	DISORDERLY CONDUCT-OFFENSIVE LANGUAGE
72	SC 2018 007310	Probable Cause Hearing	Elie Jones	No PC Dismissed 6/22/18	Teaneck	3/6/2018	39-4-97	CARELESS DRIVING
73	S 2018 000112	Probable Cause Hearing	Elie Jones	Dismissed 6/22/18	Teaneck	3/8/2018	2C-5-2A(1)	CONSPIRACY - AGREE/ENGAGE IN CONDUCT CONSTITUTE A CRIME
				Dismissed 6/22/18			2C-28-4B(1)	CONSPIRACY - AGREE/AID IN CONDUCT CONSTITUTE A CRIME
				Dismissed 6/22/18			2C-5-2A(2)	CONSPIRACY - AGREE/AID IN CONDUCT CONSTITUTE A CRIME
				Dismissed 6/22/18			2C-28-1A	PERJURY
75	SC 2018 007311	Probable Cause Hearing	Elie Jones	PC Found 6/22/18	Teaneck	3/9/2018	39-4-97.3	USE OF CELLPHONE WHILE DRIVING
76	S 2018 000205	Probable Cause Hearing	Elie Jones	Judge Recused from matter as VIC 2 is mentioned as potential witness	Hackensack	3/15/2018	2C-28-1A	PERJURY
				Dismissed 6/22/18			2C-28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
77	SC 2018 007810	Probable Cause Hearing	Elie Jones	Dismissed 6/22/18 Complaint withdrawn	Hackensack	3/28/2018	39-4-58	OBSTRUCTION OF VIEW
78	S 2018 000229	Probable Cause Hearing	Elie Jones	VIC 2 recuses from matter	Hackensack	3/21/2018	2C-33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
79				VIC 2 recuses from matter			2C-33-4C	HARASSMENT- ANY OTHER ALARMING CONDUCT
80	SC 2018 036059	Probable Cause Hearing	Elie Jones	PC Found 6/22/18	Hackensack	3/20/2018	39-3-74	OBSTRUCTION OF VIEW
STATE V. WILLIAM BROUGHTON AND TOWNSHIP OF TEANECK								
	COMPLAINTS #	STATUS	COMPLAINANT	REMARKS	MUNICIPAL COURT	DATE FILED	CHARGE	DESCRIPTION
81	SC 2018 007306	Probable Cause Hearing	Elie Jones	PC found 4/12/18, Dismissed 05/14/18	Teaneck	2/21/2018	BORO. ORD. 26-1E	INTERFERENCE WITH PUBLIC OFFICIALS
82	S 2018 000084	Probable Cause Hearing	Elie Jones	Dismissed 4/12/18	Teaneck	2/21/2018	2C-30-2A	OFFICIAL MISCONDUCT
				Dismissed 4/12/18			2C-30-2B	OFFICIAL MISCONDUCT
83	SC 2018 007307	Probable Cause Hearing	Elie Jones	Dismissed 4/12/18	Teaneck	2/21/2018	BORO. ORD. 21-2E	RESPONSIBILITY OF OWNER FOR GENERAL MAINTENANCE OF DWELLING
84	S 2018 000085	Probable Cause Hearing	Elie Jones	Dismissed 4/12/18	Teaneck	2/21/2018	2C-30-2A	OFFICIAL MISCONDUCT
				Dismissed 4/12/18			2C-30-2B	OFFICIAL MISCONDUCT
85	S 2018 000115	Probable Cause Hearing	Elie Jones	Dismissed 6/20/18	Teaneck	3/9/2018	2C-30-2A	OFFICIAL MISCONDUCT
				Dismissed 6/20/18			2C-30-2B	OFFICIAL MISCONDUCT
				Dismissed 6/20/18			2C-25-1A	ADMINISTRATIVE OBSTRUCTION OF LAW
86	S 2018 000120	Probable Cause Hearing	Elie Jones	Dismissed 6/20/18	Teaneck	3/13/2018	2C-5-2A(1)	CONSPIRACY
				Dismissed 6/20/18			2C-30-7A	CRIME OF PATTERN OF OFFICIAL MISCONDUCT
87	S 2018 000127	Probable Cause Hearing	Elie Jones	Adl. to 8/2/18	Teaneck	3/14/2018	2C-33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
							2C-33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C-33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
88	SC2018007001	Probable Cause Hearing	Elie Jones	State v. Harold Clark - Teaneck Officer, PC not found/dismised 04/12/18	Teaneck	3/14/2018	39-4-97	CARELESS DRIVING
89	SC20187312	Probable Cause Hearing	Elie Jones	State v. Harold Clark - Teaneck Officer, PC not found/dismised 04/12/18	Teaneck	3/15/2018	39-4-58	OBSTRUCTION OF VIEW

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87	S 2018 000128	Probable Cause Hearing	Elie Jones	Adj. to 8/2/18	Teaneck	3/15/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
88	SC2018007313	Probable Cause Hearing	Elie Jones	State v. Harold Clark - Teaneck Officer; PC not found/dismitted 04/12/18	Teaneck	3/15/2018	39-4-97	CARELESS DRIVING
89	SC2018007314	Probable Cause Hearing	Elie Jones	State v. Harold Clark - Teaneck Officer; PC not found/dismitted 04/12/18	Teaneck	3/15/2018	39-4-97.2A	UNSAFE DRIVING
90	SC2018007315	Probable Cause Hearing	Elie Jones	State v. Harold Clark - Teaneck Officer; PC not found/dismitted 04/12/18	Teaneck	3/15/2018	39-4-135	IMPROPER PARKING OVER YELLOW LINE
91	SC2018007316	Probable Cause Hearing	Elie Jones	State v. Harold Clark - Teaneck Officer; PC not found/dismitted 04/12/18	Teaneck	3/15/2018	39-3-75.1	IMPROPER TINTING
92	S 2018 000132	Probable Cause Hearing	Elie Jones	Adj. to 8/2/18	Teaneck	3/15/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
							2C28-5B	WITNESS TAMPERING-RET AGAINST WITNESS-NO FORCE/THREAT
							2C28-5A(3)	WITNESS TAMPERING-ELUDE LEGAL PROCESS-NO NERA/FORCE ETC
							2C28-5A(5)	WITNESS TAMPERING-OBSTRUCT OFF PROCEEDING-NO NERA/FORCE
93	SC2018007317	Probable Cause Hearing	Elie Jones	State v. Harold Clark - Teaneck Officer / PC found 4/12/18; Guilty 05/14/18	Teaneck	3/15/2018	39-3-33	NO FRONT PLATE NO REAR PLATE SHOWING
94	S 2018 000127	Probable Cause Hearing	Elie Jones	Adj. to 8/2/18	Teaneck	3/15/2018	2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC
							2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
95	S 2018 000129	Probable Cause Hearing	Elie Jones	Adj. to 8/2/18	Teaneck	3/15/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
96	S 2018 000130	Probable Cause Hearing	Elie Jones	State v. Harold Clark - Teaneck Officer	Teaneck	3/15/2018	2C27-5	BIAS INTIMIDATION-UNDERLYING OFFENSE-DP/PDP-PURPOSE
							2C28-5A(1)	RETRALIATION FOR PAST OFFICIAL ACTION
							2C28-5B	WITNESS TAMPERING-TO CAUSE FLEET TESTIMONY-NO NERA/FORCE
								WITNESS TAMPERING-RET AGAINST WITNESS-NO FORCE/THREAT
97	S 2018 000133	Probable Cause Hearing	Elie Jones	State v. Jason Hasey - Teaneck Officer; PC not found/dismitted 04/12/18	Teaneck	3/15/2018	2C29-1A	ADMINISTRATIVE OBSTRUCTION OF LAW
98	S 2018 000131	Probable Cause Hearing	Elie Jones	Dismissed 4/12/18	Teaneck	3/15/2018	2C30-2B	OFFICIAL MISCONDUCT
				Trial 7/26/18	Teaneck	3/15/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
				Dismissed 4/16/18			2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
				Dismissed 4/16/18			2C29-1A	ADMINISTRATIVE OBSTRUCTION OF LAW
99	S 2018 000128	Probable Cause Hearing	Elie Jones	Adj. to 8/2/18	Teaneck	3/15/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
							2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
100	S 2018 000135	Probable Cause Hearing	Elie Jones	Adj. to 8/2/18	Teaneck	3/15/2018	2C33-2A(1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC

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101	SC2018036050	Probable Cause Hearing	Elie Jones	State v. Fernando Grulion, PC not found/dismitted 04/12/18	Hackersack	3/20/2018	39-4-138	IMPROPER PARKING OVER YELLOW LINE
102	SC2018000231	Probable Cause Hearing	Elie Jones	State v. Fernando Grulion, PC not found/dismitted 04/12/18	Hackersack	3/20/2018	2C:33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
				Dismitted 4/12/18			2C:33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
				Dismitted 4/12/18			2C:16-1A (1)	BIAS INTIMIDATION-UNDERLYING OFFENSE=DP/PDP-PURPOSE
				Dismitted 4/12/18			2C:16-1A (2)	BIAS INTIMIDATION-UNDERLYING OFFENSE=DP/PDP-PURPOSE
				Dismitted 4/12/18				
103	SC2018007318	Probable Cause Hearing	Elie Jones	State v. Harold Clark - Teaneck Officer / PC found 4/12/18, Not Guilty 05/14/18	Teaneck	3/20/2018	39-3-76,2F	FAILURE TO WEAR SEATBELT
104	SC2018007941	Probable Cause Hearing	Elie Jones	Dismitted 6/20/18	Teaneck	3/23/2018	39-8-1	FAILURE TO INSPECT CAR - Ford
105	SC2018007942	Probable Cause Hearing	Elie Jones	Dismitted 6/20/18	Teaneck	3/23/2018	39-8-1	FAILURE TO INSPECT CAR - Black Dodge
106	SC2018007319	Probable Cause Hearing	Elie Jones	State v. John Doe / o Teaneck Police Dept.; PC not found/dismitted 04/12/18	Teaneck	3/23/2018	39-3-33	NO FRONT PLATE NO REAR PLATE SHOWING
107	S 2018 000141	Probable Cause Hearing	Elie Jones	Dismitted 6/18/18	Teaneck	3/23/2018	2C:30-2A	OFFICIAL MISCONDUCT
				Dismitted 6/18/18			2C:30-2B	OFFICIAL MISCONDUCT
				Dismitted 6/18/18			2C:29-1A	ADMINISTRATIVE OBSTRUCTION OF LAW
108	SC2018007943	Probable Cause Hearing	Elie Jones	State v. Officer Michael Chaloub, Dismitted 5/21/18	Teaneck	3/26/2018	39-3-76,F	FAILURE TO WEAR SEATBELT
109	SC2018007944	Probable Cause Hearing	Elie Jones	New 2018 - State v. Officer Michael Chaloub, Dismitted 5/21/18	Teaneck	3/26/2018	39-4-97.2	UNSAFE DRIVING
110	SC2018007945	Probable Cause Hearing	Elie Jones	State v. Officer Michael Chaloub, Dismitted 5/21/18	Teaneck	3/26/2018	39-4-126	FAILURE TO SIGNAL
111	SC2018007946	Probable Cause Hearing	Elie Jones	Dismitted 6/20/18	Teaneck	3/27/2018	39-8-1	FAILURE TO INSPECT CAR
112	SC2018007947	Probable Cause Hearing	Elie Jones	Dismitted 6/20/18	Teaneck	3/27/2018	39-4-138	IMPROPER PARKING OVER YELLOW LINE
113	SC2018007948	Probable Cause Hearing	Elie Jones	Dismitted 6/20/18	Teaneck	3/27/2018	39-8-9B (1)	FAILS TO HAVE MOTOR VEHICLE EXAMINED WITHIN THE TIME PERIOD
114	SC2018007949	Probable Cause Hearing	Elie Jones	Dismitted 6/20/18	Teaneck	3/27/2018	39-8-9B (2)	FAILS TO DISPLAY/OBTAIN CERTIFICATE OF APPROVAL
115	SC2018007950	Probable Cause Hearing	Elie Jones	Dismitted 6/20/18	Teaneck	3/27/2018	39-8-9B (3)	FAILS TO HAVE MOTOR VEHICLE IN PROPER CONDITION
116	SC2018007951	Probable Cause Hearing	Elie Jones	Dismitted 6/20/18	Teaneck	3/27/2018	39-8-9C	FRAUDULENT OBTAINS A CERTIFICATE OF APPROVAL
117	SC2018007952	Probable Cause Hearing	Elie Jones	Dismitted 6/20/18	Teaneck	3/27/2018	39-4-138	PARKED IN NO PARKING
118	SC 2018 007953	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Harold Clark	Teaneck	4/13/2018	ORD 36-12	PROHIBITED PARKING
119	SC 2018 007957	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/13/2018	ORD 29A-12	MAINTENANCE OF EXTERIOR - SHATTER DOOR
120	SC 2018 007958	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/13/2018	ORD 29A-13	MAINTENANCE OF EXTERIOR - BROKEN & SHATTER DOOR
121	SC 2018 007960	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/13/2018	ORD 29A-23	APPEARANCE OF EXTERIOR - SHATTER DOOR
122	SC 2018 007961	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/13/2018	ORD 36-12	PROHIBITED PARKING
123	SC 2018 007954	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/13/2018	39-8-1	FAILURE TO INSPECT CAR
124	SC 2018 007955	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/13/2018	ORD 36-12	PROHIBITED PARKING

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125	SC 2018 007956	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/13/2018	39a-1(B)	FAILURE TO INSPECT CAR
126	SC 2018 007963	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Harold Clark	Teaneck	4/17/2018	39a-33	NO FRONT PLATE NO REAR PLATE SHOWING
127	SC 2018 007964	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Harold Clark	Teaneck	4/17/2018	39a-33	NO FRONT PLATE NO REAR PLATE SHOWING
128	SC 2018 007965	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Harold Clark	Teaneck	4/17/2018	39a-32	FAILURE TO REPLACE PLATE
129	SC 2018 007966	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Gregory Rucker	Teaneck	4/17/2018	39a-76.2F	FAILURE TO WEAR SEATBELT
130	SC 2018 007967	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Leonard Daily	Teaneck	4/19/2018	39a-126	FAILURE TO SIGNAL
131	SC 2018 007968	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Leonard Daily	Teaneck	4/19/2018	39a-70.2	ENGINE IDLE / RUNNING WHILE PARKED
132	SC 2018 007969	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Leonard Daily	Teaneck	4/19/2018	39a-53	VEHICLE UNATTENDED & RUNNING
133	SC 2018 007970	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Victoria Kellman	Teaneck	4/19/2018	39a-126	FAILURE TO SIGNAL
134	SC 2018 007972	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/25/2018	BORO ORD. 26-18	INTERFERENCE WITH PUBLIC OFFICIALS
135	SC 2018 007973	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/25/2018	BORO ORD. 26-18	INTERFERENCE WITH PUBLIC OFFICIALS
136	SC 2018 007974	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/25/2018	BORO ORD. 26-18	INTERFERENCE WITH PUBLIC OFFICIALS
137	SC 2018 007975	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/25/2018	BORO ORD. 26-18	INTERFERENCE WITH PUBLIC OFFICIALS
138	SC 2018 007971	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/25/2018	BORO ORD. 21-19	
139	SC 2018 000177	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/25/2018	2C30-2A	OFFICIAL MISCONDUCT
						2C30-2B	OFFICIAL MISCONDUCT	
						2C30-6A (1)	OFFICIAL DEPRIVATION CIVIL RIGHT - UNLAW DETEN/BI RESULTS	
						2C30-6A (2)	DEPRIVATION/CIVIL RIGHT DENIES ANOTHER TO EXERCISE RIGHT	
						2C33-2A (1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC	
						2C33-2B	DISORDERLY CONDUCT-OFFENSIVE LANGUAGE	
140	SC 2018 000180	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	4/25/2018	2C30-2A	OFFICIAL MISCONDUCT
						2C30-2B	OFFICIAL MISCONDUCT	
141	SC 2018 007976	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Patrick Forrest	Teaneck	4/25/2018	39a-76.2F	FAILURE TO WEAR SEATBELT
142	SC 2018 000179	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. R. Morales	Teaneck	4/25/2018	2C30-2A	OFFICIAL MISCONDUCT
						2C30-2B	OFFICIAL MISCONDUCT	
143	SC 2018 000188	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. T. Tully, Jr.	Teaneck	4/25/2018	2C30-6A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C30-6(B)	OFFICIAL DEPRIVATION CIVIL RIGHT- FALSE STATEMENT	
						2C30-6 E	OFFICIAL DEPRIVATION CIVIL RIGHT-VIOLATES CONSTITUTION	
144	SC 2018 000185	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. T. Tully, Jr.	Teaneck	4/25/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT	
						2C30-2A	OFFICIAL MISCONDUCT-OFFICIAL FUNCTION-BENEFIT = <\$200	
						2C30-2B	OFFICIAL MISCONDUCT-NON-PERFORM DUTIES-BENEFIT = <\$200	
						2C12-3A	TERRORISTIC THREATS-OCCURS DURING STATE OF EMERGENCY	
						2C12-3B	TERRORISTIC THREATS-THREATEN IMMINENT DEATH-PURP FEAR	
						2C33-2A (1)	DISORDERLY CONDUCT-IMPROP BEHAVIOR-FIGHT/THREATEN/ETC	
						2C33-2B	DISORDERLY CONDUCT-OFFENSIVE LANGUAGE	
						2C33-2A (2)	DISORDERLY CONDUCT-IMPROP BEHAVY-CREATE HAZARDOUS CONDT	
						2C29-1A	OBSTRUCT ADMIN OF LAW-OBSTRUCT GOVT FUNCTION	

[illegible]

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1701 SC 2018 007350	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Twp of Teaneck C/O W. Broughton	Teaneck	5/11/2018	BORO 294-23.1	MAINTENANCE OF EXTERIOR OF STRUCTURES - VACANT BUILDING
1711 SC 2018 007351	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Twp of Teaneck C/O W. Broughton	Teaneck	5/11/2018	BORO 294-24	MAINTENANCE OF EXTERIOR OF STRUCTURES - STRUCTURE SOUNDNESS
1721 SC 2018 007352	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Twp of Teaneck C/O W. Broughton	Teaneck	5/11/2018	BORO 294-25	MAINTENANCE OF EXTERIOR OF STRUCTURES - FOUNDATION WALL
1731 SC 2018 007353	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Twp of Teaneck C/O W. Broughton	Teaneck	5/11/2018	BORO 294-26	MAINTENANCE OF EXTERIOR OF STRUCTURES - BASEMENT MOIST & DAMP
1741 SC 2018 007354	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Twp of Teaneck C/O W. Broughton	Teaneck	5/11/2018	BORO 294-30	MAINTENANCE OF EXTERIOR OF STRUCTURES - PAINTING
1751 SC 2018 007355	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Twp of Teaneck C/O W. Broughton	Teaneck	5/11/2018	BORO 294-31	MAINTENANCE OF EXTERIOR OF STRUCTURES - WATER/TIGHTNESS
1761 SC 2018 007356	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Twp of Teaneck C/O W. Broughton	Teaneck	5/11/2018	BORO 294-16	MAINTENANCE OF EXTERIOR OF STRUCTURES - SIGN MAINTENANCE
1771 SC 2018 007357	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Jason Hosey C/O Twp of Teaneck	Teaneck	5/11/2018	39-4-126	FAILURE TO SIGNAL
1781 SC 2018 007358	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Robert Mehnert C/O Twp of Teaneck	Teaneck	5/11/2018	39-3-76.2 (f)	FAILURE TO WEAR SEATBELT
1791 SC 2018 007362	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Robert Mehnert C/O TPD & Twp of Teaneck	Teaneck	5/11/2018	39-3-76.2 (f)	FAILURE TO WEAR SEATBELT
1801 SC 2018 007363	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Tully Jr. C/O TPD & Twp of Teaneck	Teaneck	5/11/2018	39-4-126	FAILURE TO SIGNAL
1811 SC 2018 000197	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Tully Jr. C/O TPD & Twp of Teaneck	Teaneck	5/11/2018	2C30-2A	OFFICIAL MISCONDUCT - OFFICIAL FUNCTION - BENEFIT = <\$200
1821 SC 2018 007367	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Tully Jr. C/O TPD & Twp of Teaneck	Teaneck	5/11/2018	BORO 26-18	OFFICIAL MISCONDUCT - NON-PERFORM DUTIES - BENEFIT = <\$200
1831 SC 2018 000198	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Tully Jr. C/O TPD & Twp of Teaneck	Teaneck	5/11/2018	2C33-4A	INTERFERENCE WITH PUBLIC OFFICIALS
						2C33-4C	HARASSMENT - COMMUNICATION IN MANNER TO CAUSE ALARM
						2C30-7A	HARASSMENT - ANY OTHER ALARMING CONDUCT
						2C30-2A	PATTERN OF OFFICIAL MISCONDUCT
						2C30-2B	OFFICIAL MISCONDUCT - OFFICIAL FUNCTION - BENEFIT = <\$200
						2C30-2B	OFFICIAL MISCONDUCT - NON-PERFORM DUTIES - BENEFIT = <\$200
1841 SC 2018 007368	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Tully Jr. C/O TPD & Twp of Teaneck	Teaneck	5/11/2018	BORO 26-18	INTERFERENCE WITH PUBLIC OFFICIALS
1851 SC 2018 007359	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Borough of Bergenfield	Bergenfield	5/11/2018	39-4-138E(1)	NO PARKING WITHIN 25FT OF CROSSWALK
1861 SC 2018 007360	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Borough of Bergenfield	Bergenfield	5/11/2018	39-4-138H	NO PARKING WITHIN 50FT OF STOP SIGN
1871 SC 2018 007361	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Borough of Bergenfield	Bergenfield	5/11/2018	39-4-138G	NO PARKING WITHIN 50FT OF STOP SIGN
1881 SC 2018 007379	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Harold Clark C/O TPD & Twp of Teaneck	Teaneck	5/12/2018	39-3-44	UNSAFE VEHICLE
1891 SC 2018 007380	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Harold Clark C/O TPD & Twp of Teaneck	Teaneck	5/12/2018	36-32-159	PARKING OVER WHITE LANE
1901 SC 2018 007381	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Michael Kingman	Teaneck	5/12/2018	36-32-15	RESTRICTED PARKING
1911 SC 2018 007382	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Harold Clark C/O TPD & Twp of Teaneck	Teaneck	5/12/2018	39-3-33	NO FRONT PLATE NO REAR PLATE SHOWING
1921 SC 2018 007383	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Harold Clark C/O TPD & Twp of Teaneck	Teaneck	5/12/2018	39-3-33	NO FRONT PLATE NO REAR PLATE SHOWING
1931 SC 2018 007380	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Harold Clark C/O TPD & Twp of Teaneck	Teaneck	5/12/2018	36-32-156	PARKING OVER WHITE LANE
1941 SC 2018 007385	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Twp of Teaneck C/O W. Broughton	Teaneck	5/12/2018	36-32-158	PARKING OVER WHITE LANE
1951 SC 2018 007386	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Twp of Teaneck C/O W. Broughton	Teaneck	5/12/2018	39-8-1	FAILURE TO INSPECT CAR
1961 SC 2018 007387	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Curtis E. Caviness	Teaneck	5/12/2018	36-32-156	PARKING OVER WHITE LANE
1971 SC 2018 007388	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Vincent Dugan	Teaneck	5/12/2018	39-3-75	PARKING OVER WHITE LANE
1981 SC 2018 000242	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Izzy Infield	Teaneck	5/23/2018	2C33-3A(2)	UNSAFE VEHICLE - WINDSHIELD FRACTURE
						2C33-4A	FALSE REPORT TO W/IN ORG DEAL W/ DANGER TO LIFE/PROP
						2C33-4C	HARASSMENT - COMMUNICATION IN MANNER TO CAUSE ALARM
						2C33-4C	HARASSMENT - ANY OTHER ALARMING CONDUCT
1991 SC 2018 000241	Probable Cause Hearing	Elle Jones	CV 034-18 - State v. Stephen Ramirez	Teaneck	5/23/2018	2C28-2A	FALSE SWEARING - FALSE STATEMENT UNDER OATH
						2C28-4A	FALSE REPTS TO LAW ENFORCER - FALSELY INCR OTHER NOT 1 OR 2 DEG
						2C28-4B (2)	FALSE REPT TO LAW ENFORCER - FICT RPT - REPORT W/O KNOWLEDGE

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200 S 2018 000243	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Stephen Ramirez	Teaneck	5/23/2018	2C28-4A	FALSE REPTS TO LAW ENFOR-FALSY INCR OTH-NOT 1 OR 2 DEG
	S 2018 000243					2C28-4B (1)	FALSE REPT TO LAW ENFOR-FICT RPT-REPORT FALSE INCIDENT
						2C28-4B (2)	FALSE REPT TO LAW ENFOR-FICT RPT-REPORT W/O KNOWLEDGE
						2C30-2A	OFFICIAL MISCONDUCT-OFFICIAL FUNCTION-BENEFIT =<\$200
						2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
						2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C28-5B	WITNESS TAMPERING-RET AGAINST WITNESS-NO FORCE/THREAT
201 S 2018 000244	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Stephen Ramirez	Teaneck	5/23/2018	2C28-4B	BITICIOUS REPORTS
						2C30-2	OFFICIAL MISCONDUCT-OFFICIAL FUNCTION-BENEFIT =<\$200
						2C5-2(1)	CONSPIRACY -ATTEMPTED OR SOLICITATION TO COMMIT SUCH CRIME
						2C5-2(2)	CONSPIRACY -PLANNING OR COMMISSION TO COMMIT SUCH CRIME
						2C5-2B	CONSPIRACY - CONSPIRED WITH PERSON OR PERSONS TO COMMIT THE SAME CRIME
						2C5-2C	CONSPIRACY - CONSPIRES TO COMMIT A NUMBER OF CRIMES
202 SC 2018 007389	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Mohammed Hameeduddin	Teaneck	5/23/2018	2C33-33	NO FRONT PLATE NO REAR PLATE SHOWING
203 SC 2018 007390	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Vincent Dugan	Teaneck	5/23/2018	2C33-76-2F	FAILURE TO WEAR SEATBELT
204 SC 2018 007391	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Vincent Dugan	Teaneck	5/23/2018	2C33-76-2A	FAILURE TO WEAR THE CHILD PASSENGER RESTRAINT SYSTEMS
205 SC 2018 007392	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Vincent Dugan	Teaneck	5/23/2018	2C33-76-2B	REPEALED
206 SC 2018 007394	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Twp of Teaneck	Teaneck	5/30/2018	2C33-70-2	AIR POLLUTION - MOTOVEHICLE IDLE
207 SC 2018 007395	Probable Cause Hearing	Elie Jones	NCV 034-18 - State v. Curtis E. Carrness	Teaneck	5/30/2018	2C33-33	NO FRONT PLATE NO REAR PLATE SHOWING
208 SC 2018 007396	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Paul Kearns	Teaneck	5/30/2018	2C33-76-2F	FAILURE TO WEAR SEATBELT
209 SC 2018 007397	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Paul Kearns	Teaneck	5/30/2018	2C33-76-2B	OPERATING MOTOVEHICLE IN AN UNSAFE MANNER
210 SC 2018 007398	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Paul Kearns	Teaneck	5/30/2018	2C33-126	FAILURE TO SIGNAL
211 S 2018 000258	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Paul Kearns	Teaneck	5/30/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
212 SC 2018 007399	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Twp of Teaneck	Teaneck	5/30/2018	2C33-31	FAILURE TO FIX SIDEWALKS
213 SC 2018 007400	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Twp of Teaneck	Teaneck	5/30/2018	2C33-19	ABATEMENT OF STAGNANT WATER
214 SC 2018 007421	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Harold Clark	Teaneck	5/30/2018	2C33-72(1)	UNSAFE MOTOVEHICLE -TREAD WEAR TIRES
215 SC 2018 007422	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Harold Clark	Teaneck	5/30/2018	2C33-72(4)	UNSAFE MOTOVEHICLE -TREAD WEAR TIRES
216 SC 2018 007423	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Vincent Dugan	Teaneck	5/30/2018	2C33-76-2B	FAILURE TO WEAR SEATBELT
217 S 2018 000257	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Glenn C'Reilly	Teaneck	5/30/2018	2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
						2C16-1A (1)	BIAS INTIMIDATION-UNDERLYING OFFENSE-DP/PDP-PUROPOSE
						2C16-1A (2)	BIAS INTIMIDATION-UNDERLYING OFFENSE-DP/PDP-KNOWING
218 S 2018 000259	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. R. Morales	Teaneck	5/30/2018	2C30-2A	OFFICIAL MISCONDUCT-OFFICIAL FUNCTION-BENEFIT =<\$200
						2C30-2B	OFFICIAL MISCONDUCT-NON-PERFORM DUTIES-BENEFIT =<\$200
						2C30-7A	PATTERN OF OFFICIAL MISCONDUCT
219 S 2018 000260	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Stephen Moreno	Teaneck	5/30/2018	2C28-4A	FALSE REPTS TO LAW ENFOR-FALSY INCR OTH-NOT 1 OR 2 DEG
						2C28-4B (1)	FALSE REPT TO LAW ENFOR-FICT RPT-REPORT FALSE INCIDENT

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220 S 2018 000261	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Mohammed Hameeduddin	Teaneck	5/30/2018	2C30-2A	OFFICIAL MISCONDUCT-OFFICIAL FUNCTION-BENEFIT =<\$200
						2C30-2B	OFFICIAL MISCONDUCT-NON-PERFORM DUTIES-BENEFIT =<\$200
221 S 2018 000263	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Mohammed Hameeduddin	Teaneck	5/30/2018	2C30-8(A) (B) (1) (2)	PUBLIC CORRUPTION
222 S 2018 000262	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. W. Broughton	Teaneck	5/30/2018	2C30-2A	OFFICIAL MISCONDUCT-OFFICIAL FUNCTION-BENEFIT =<\$200
						2C30-2B	OFFICIAL MISCONDUCT-NON-PERFORM DUTIES-BENEFIT =<\$200
223 SC 2018 007424	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. R. Factor	Teaneck	6/2/2018	39-4-126	FAILURE TO SIGNAL
224 SC 2018 007425	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Michael Kingman	Teaneck	6/6/2018	36-32.15(9)	NO PKG WHITE PAINTED LINE
225 SC 2018 007426	Probable Cause Hearing	Elie Jones	CV 034-18 - State v. Michael Kingman	Teaneck	6/6/2018	ORD 1139	COUNCIL ONLY
STATE V. TRACY ANDOLINI							
226 S 2018 000210	Probable Cause Hearing	Elie C. Jones	New 2018	Hackensack	3/15/2018	2C33-4A 2C33-4C	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C16-1A(1)	BIAS INTIMIDATION-UNDERLYING OFFENSE=DP/PDP-PURPOSE
						2C16-1A(2)	BIAS INTIMIDATION-UNDERLYING OFFENSE=DP/PDP-PURPOSE
227 S 2018 000272	Probable Cause Hearing	Elie C. Jones	New 2018	Hackensack	4/20/2018	2C5-2A(1) 2C12-1A(1)	CONSPIRACY SIMPLE ASSAULT
STATE V. LAURA SIMOLDONI							
228 S 2018 000209	Probable Cause Hearing	Elie C. Jones	New 2018	Hackensack	3/15/2018	2C16-1A(2) 2C30-2A	BIAS INTIMIDATION-UNDERLYING OFFENSE=DP/PDP-PURPOSE OFFICIAL MISCONDUCT
						2C16-1A(1)	BIAS INTIMIDATION-UNDERLYING OFFENSE=DP/PDP-PURPOSE
						2C33-4A	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM
						2C33-4C	HARASSMENT-ANY OTHER ALARMING CONDUCT
229 S 2018 000273	Probable Cause Hearing	Elie C. Jones	New 2018	Hackensack	4/20/2018	2C30-2A 2C30-2B	OFFICIAL MISCONDUCT OFFICIAL MISCONDUCT
						2C28-5B	TAMPERING WITH WITNESSES & INFORMANTS; RETALIATION AGAINST THEM
						2C28-4B(1)	TAMPERING WITH WITNESSES & INFORMANTS; RETALIATION AGAINST THEM
						2C28-5B	TAMPERING WITH WITNESSES & INFORMANTS; RETALIATION AGAINST THEM
STATE V. HON. PETER MELCHIONNE, JSC							
230 S 2018 208	Probable Cause Hearing	Elie C. Jones	New 2018	Hackensack	3/15/2018	2C33-4A 2C33-4C	HARASSMENT-COMMUNICATION IN MANNER TO CAUSE ALARM HARASSMENT-ANY OTHER ALARMING CONDUCT
						2C30-2B	OFFICIAL MISCONDUCT
						2C30-2A	OFFICIAL MISCONDUCT
						2C16-1A(1)	BIAS INTIMIDATION-UNDERLYING OFFENSE=DP/PDP-PURPOSE
						2C16-1A(2)	BIAS INTIMIDATION-UNDERLYING OFFENSE=DP/PDP-PURPOSE

TOWN COMPLAINTS # OFFENSE COMPLAINANT DEFENDANT

ELIE C. JONES - PROBABLE CAUSE FOUND - Court date 2/22/2018

Hackensack	S 2017 000033	2C:29-9B(2)	Teresa Alton	Elie Jones	REMARKS Transferred to Family Div. & Public Defender assigned - M. Seymour
Teaneck	S 2018 000068	2C:33-4A	Barbara Clayton	Elia Jones	Public Defender assigned - M. Seymour

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EXHIBIT D

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Attorneys for Proposed Amici Curiae Township of Teaneck
17005-0001

IN THE MATTER OF ELIE C. JONES

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY
DOCKET NO. BER-L-2683-18

Civil Action

**CERTIFICATION OF COUNSEL IN
SUPPORT OF MOTION TO APPEAR
AS AMICUS CURIAE**

MICHAEL D. WITT hereby certifies as follows:

1. This firm is counsel for the Township of Teaneck (the "Township"). As such, I have full knowledge of the facts contained herein.

2. I submit this Certification in support of the Township's Motion for leave to participate as amicus curiae in the above-entitled matter.

3. Specifically, the Township wishes to ensure that the Order the Court is contemplating entering in this matter applies to any type of complaint, including, but not limited to, criminal, quasi-criminal, civil, and/or violation of township code complaint filed in the Township's Municipal Court.

Interest of the Township

4. On May 8, 2018, this office was advised by Robert J. Pantina, Esq., Law

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Clerk to the Honorable Bonnie J. Mizdol, A.J.S.C., that the Court had issued an Order to Show Cause (the "OTSC") on April 6, 2018, directing Elie C. Jones ("Jones") to show cause why an order should not be entered requiring "all future lawsuits and/or civilian-criminal complaints filed by [him] to be reviewed by this court . . . before service is effectuated on any party." (Emphasis added.)

5. The preambulatory clause of the OTSC recites that Jones, inter alia, has filed "at least seventy-eight (78) civilian-criminal complaints in Municipal Courts in at least three municipalities in Bergen County."

6. Although this Court has access to and may take judicial notice of Jones' myriad complaints, Jones filed at least 113 complaints in the Municipal Court of Teaneck against Township employees and officials since January 2017. (**Exhibit 1**)¹

7. Over sixty (60) of these charges were filed *after* the issuance of the OTSC in this matter.

8. All charges that have been already disposed of were either withdrawn by Jones or dismissed by the court.

9. Jones—who has accused the Township Clerk of harassment and assault for closing the sliding window at the clerk's office, who has filed complaints

¹ This number does not include complaints filed by Jones against non-Township employed individuals.

Of note, R. 7:2-1 provides that "[t]he municipal court administrator or deputy court administrator shall accept for filing every complaint made by any person." A Supreme Court Working Group is currently considering a proposed change to this rule that would require County prosecutorial review of private citizen complaints charging disorderly persons offenses filed against party officials, public servants, candidates/nominees for public office and judicial nominees. See Report Of The Supreme Court Working Group On Private Citizen Complaints In The Municipal Courts, available at <https://www.judiciary.state.nj.us/notices/2018/n180221b.pdf>

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against Township police officers for obstructing administration of the law, harassment, official misconduct and bias intimidation, and who has scoured municipal parking lots to issue citations to municipal employees for parking on the painted white lines designating parking spots—has admitted in other contexts that his conduct is intended to disrupt the Township's operations. (**Exhibit 2**)

10. Teaneck, a body politic and corporate of the State of New Jersey, is accountable to Township taxpayers.

11. Every time Jones files a complaint against a Township employee or official, the Township Council appoints legal counsel to defend the employee against Jones' repetitive and unfounded complaints.

12. Though already proliferous, the escalating nature of the complaints—which charge criminal and quasi-criminal conduct and assert violations of the Township Code—threatens the economic well-being of the Township and the efficiency of Township operations.

12. The Township—which appears to be the epicenter of Jones' civilian-complaints—has an interest in this matter, as the Court's determination will impact the Township and its taxpayers.

13. I respectfully request that the Court permit the Township to proceed as an amicus in this matter. The Township moved in a timely fashion to appear in this matter upon being notified of the OTSC's filing, its participation will assist in the resolution of this issue of public importance, and no parties in the litigation will be unduly prejudiced by its participation.

I certify that the foregoing statements are true. I am aware that if any of the

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foregoing statements made by me are willfully false, I am subject to punishment.

CHASAN LAMPARELLO MALLON &
CAPPUZZO
Attorneys for Township of Teaneck,

By: /s/ Michael D. Witt
MICHAEL D. WITT

Dated: May 14, 2018

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Exhibit 1

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Date Filed	Complaint No.	Defendant	Offense	Disposition
1/9/17	SC-2017-7122	Teaneck Police Detective Harold Clark	Failure to obtain motor vehicle inspection (N.J.S.A. 39:8-1)	Dismissed on 2/23/17; Jones assessed \$33 in costs
1/10/17	S-2017-14	Township Clerk Issa Abbasi	Harassment (N.J.S.A. 2C:33-4A)	No probable cause found; Jones assessed \$33 in costs
2/22/17	S-2017-112	Teaneck Police Lt. Thomas Tully	Official Misconduct (N.J.S.A. 2C:30-2a); Deprivation of civil rights (N.J.S.A. 2C:30-6A(1) and (2))	Complaint withdrawn by Jones
2/22/17	S-2017-113	Teaneck Police Lt. Thomas Tully	Obstructing administration of law (N.J.S.A. 2C:29-1A)	Complaint withdrawn by Jones
2/23/17	SC-2017-6822	Teaneck Police Detective Harold Clark	Parking in a Fire Zone in violation of N.J.S.A. 39:4-135	Dismissed on 3/16/17; Jones assessed \$33 in costs
3/17/17	S-2017-49	Township Clerk Issa Abbasi	Simple Assault (N.J.S.A. 2C:12-1A(1))	No probable cause found
8/29/17	S-2017-473	Township Police Sergeant J. Garland	Harassment (N.J.S.A. 2C:33-4A); Official Misconduct (N.J.S.A. 2C:30-2(a) and (b))	No probable cause found; Jones assessed \$99 in court costs
2/21/18	S-2018-85	Township of Teaneck	Official Misconduct (N.J.S.A. 2C:30-2(a) and (b))	No probable cause/withdrawn.
2/21/18	SC-2018-7307	Township of Teaneck	Failure to maintain dwelling (Ord. 21-28A)	No probable cause found
2/21/18	S-2018-84	Teaneck Manager William Broughton	Official Misconduct (N.J.S.A. 2C:30-2(a) and (b))	No probable cause found

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2/21/18	SC-2018-7306	Teaneck Manager William Broughton	Interference with public officials (Ord. 26-18)	No probable cause found
3/9/18	S-2018-115	Teaneck Health Officer Ken Katter	Official Misconduct (N.J.S.A. 2C:30-2(a) and (b)); Obstructing administration of law (N.J.S.A. 2C:29-1A)	Pending PC determination
3/13/18	S-2018-120	Teaneck Health Officer Ken Katter	Conspiracy (N.J.S.A. 2C:5-2A(1)); Pattern of official misconduct (N.J.S.A. 2C:30-7A)	Pending PC determination
3/14/18	S-2018-127	Teaneck Police Detective Harold Clark	Disorderly conduct (N.J.S.A. 2C:33-2A(1)); Harassment (N.J.S.A. 2C:33-4A & C)	Pending PC determination
3/14/18	SC-2018-7953	Teaneck Police Detective Harold Clark	Parking in restricted zone Code Sec. 36-12	Pending PC determination
3/14/18	SC-2018-7001	Teaneck Police Detective Harold Clark	Careless driving (N.J.S.A. 39:4-97)	No probable cause found.
3/15/18	S-2018-133	Teaneck Police Officer Jason Hosey	Obstructing administration of law (N.J.S.A. 2C:29-1A); Official Misconduct (N.J.S.A. 2C:30-2a)	Withdrawn as to obstruction; no probable cause as to misconduct
3/15/18	S-2018-128 S-2018-129 S-2018-130	Teaneck Police Detective Harold Clark	Harassment (N.J.S.A. 2C:33-4A & C); Bias intimidation (N.J.S.A. 2C:16-1A(1)); Retaliation for past official action (N.J.S.A. 2C:27-5); Witness tampering (N.J.S.A.	Pending PC determination

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3/15/18	S-2018-132	Teaneck Police Detective Harold Clark	2C:28-5A(1) & B); Harassment (N.J.S.A. 2C:33-4A & C); Witness tampering (N.J.S.A. 2C:28-5A(3); -5(A)(5); -5(B))	awaiting PC determination
3/15/18	SC-2018-7315	Teaneck Police Detective Harold Clark	Improper parking on yellow line (N.J.S.A. 39:4-135)	No probable cause
3/15/18	SC-2018-7316	Teaneck Police Detective Harold Clark	Improper tinting (N.J.S.A. 39:3-75.1)	No probable cause
3/15/18	S-2018-131	Teaneck Police Officer Patrick Forrester	Harassment (N.J.S.A. 2C:33-4A & C; O Obstructing administration of law (N.J.S.A. 2C:29-1A)	No probable cause found as to N.J.S.A. 2C:33-4C and N.J.S.A. 2C:29-1A
3/15/18	SC-2018-7312	Teaneck Police Detective Harold Clark	Windshield/Obstruction (N.J.S.A. 39:4-58)	No probable cause
3/15/18	SC-2018-7313	Teaneck Police Detective Harold Clark	Careless Driving (N.J.S.A. 39:4-97)	No probable cause
3/15/18	SC-2018-7314	Teaneck Police Detective Harold Clark	Unsafe driving (N.J.S.A. 39:4-97.2)	No probable cause
3/15/18	SC-2018-7315	Teaneck Police Detective Harold Clark	No plates showing (N.J.S.A. 39:3-33)	No probable cause
3/20/18	S-2018-135 SC-2018-7318	Teaneck Police Detective Harold Clark	Official Misconduct (N.J.S.A. 2C:30-2a); Failure to wear seatbelt (N.J.S.A. 39:3- 76)	Awaiting PC on Official Misconduct; Awaiting Court appearance on failure to wear seatbelt
3/23/18	S-2018-141	Teaneck Police Lt. John Faggello	Official Misconduct (N.J.S.A. 2C:30-2(a) and (b)); Obstructing	Probable Cause pending

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3/23/18	SC-2018-7319	Teaneck Police Department (John Doe)	administration of law (N.J.S.A. 2C:29-1A)	
3/23/18	SC-2018-7941 SC-2018-7942	Township of Teaneck	Failure to display front marker on vehicle (N.J.S.A. 39:3-33) Failure to inspect cars for alleged violation (N.J.S.A. 39:8-1)	No probable cause found Pending PC determination
3/26/18	S-2018-7943 S-2018-7944 S-2018-7945	Teaneck Police Officer Michael Chaloub	Failure to wear seatbelt (N.J.S.A. 39:3-76); Unsafe driving (N.J.S.A. 39:4-97.2); Failure to give proper signal (N.J.S.A. 39:4-126)	Pending court appearance
3/27/18	SC-2018-7946 SC-2018-7947 SC-2018-7948 SC-2018-7949 SC-2018-7950 SC-2018-7951 SC-2018-7952	Township of Teaneck	Improper parking of DPW truck (N.J.S.A. 39:4-138); Failure to inspect (N.J.S.A. 39:8-1); Motor vehicle/certification/inspection failures (N.J.S.A. 39:8-B)(1), (2) & (3); (C)	Pending PC determination
4/13/18	SC-2018-7957	Township of Teaneck	Failure to maintain exterior structure (Code Sec. 29A-12)	Pending PC determination
4/13/18	SC-2018-7958	Township of Teaneck	Failure to maintain exterior structure (Code Sec. 29A-13)	Pending PC determination
4/13/18	SC-2018-7960	Township of Teaneck	Failure to maintain good repair, shattered door (Code Sec. 29A-	Pending PC determination

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4/13/18	SC-2018-7961	Township of Teaneck	23) No parking at all times, fail to fix fence (Code Sec. 36-12)	Pending PC determination
4/13/18	SC-2018-7954	Township of Teaneck	Failure to inspect plate (N.J.S.A. 39:8-1)	Pending PC determination
4/13/18	SC-2018-7955	Township of Teaneck	Parking in prohibited area (Code Sec. 36- 12)	Pending PC determination
4/13/18	SC-2018-7956	Township of Teaneck	Refusal to inspect (N.J.S.A. 39:8-1(B))	Pending PC determination
4/17/18	SC-2018-7963	Teaneck Police Detective Harold Clark	Failure to display plates (N.J.S.A. 39:3- 33)	Pending PC determination
4/17/18	SC-2018-7964	Teaneck Police Detective Harold Clark	Failure to display license plates at proper height (N.J.S.A. 39:3- 33)	Pending PC determination
4/17/18	SC-2018-7965	Teaneck Police Detective Harold Clark	Failure to display lost, destroyed or defaced plate (N.J.S.A. 39:3- 32)	Pending PC determination
4/17/18	SC-2018-7966	Teaneck Police Officer Gregory Rucker	Failure to wear a seat belt (N.J.S.A. 39:3- 76.2F)	Pending PC determination
4/19/18	SC-2018-7970	Teaneck Police Officer Victoria Kellman	Failure to give proper signal (N.J.S.A. 39:4- 126)	Pending PC determination
4/19/18	SC-2018-7968	Leonard Daily	Unattended vehicle/engine idling (N.J.S.A. 39:3-70.2)	Pending PC determination
4/19/18	SC-2018-7967	Leonard Daily	Failure to use directional signals	Pending PC determination

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4/19/18	SC-2018-7969	Leonard Daily	(N.J.S.A. 39:4-126) Leaving vehicle unattended and running (N.J.S.A. 39:4- 53)	Pending PC determination
4/25/18	SC-2018-185	Teaneck Police Lt. Thomas Tully, Jr.	23 total charges, including: Harassment (N.J.S.A. 2C:33-4A & C); Official Misconduct (N.J.S.A. 2C:30-2(A) and (B)); Terroristic threats (N.J.S.A. 2C:12-3A & B) (various charges); obstructing administration of law (N.J.S.A. 2C:29-1A); Harassment (N.J.S.A. 2C:33-4B); witness tampering (N.J.S.A. 2C:28-5A(1) -(5)); official deprivation of civil rights (N.J.S.A. 2C:30-6A(2)); Bias intimidation (N.J.S.A. 2C:16-1A(1) & (2) & (3))	Pending PC determination
4/25/18	SC-2018-188	Teaneck Police Lt. Thomas Tully, Jr.	Three charges of Official deprivation of civil rights (N.J.S.A. 2C:30-6(3), (D), (E))	Pending PC determination
4/25/18	SC-2018-7971	Township of Teaneck	Failure to abate stagnant water (Code Sec. 21-19)	Pending PC determination

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4/25/18	SC-2018-7972	Township Manager William Broughton	Interference with public officials (health department) (Code Sec. 26-18)	Pending PC determination
4/25/18	SC-2018-7973	Township Manager William Broughton	Interference with public officials (Police Dept) (Code Sec. 26-18)	Pending PC determination
4/25/18	SC-2018-7974	Township Manager William Broughton	Interference with public officials (building department) (Code Sec. 26-18)	Pending PC determination
4/25/18	SC-2018-7975	Township Manager William Broughton	Interference with public officials (municipal court) (Code Sec. 26- 18)	Pending PC determination
4/25/18	SC-2018-7976	Teaneck Police Officer Patrick Forrester	Failure to wear seatbelt (N.J.S.A. 39:3- 76-2f)	Pending PC determination
4/25/18	S-2018-177	Township Manager William Broughton	Official Misconduct (N.J.S.A. 2C:30-2(a) and (b)); official deprivation of civil rights (N.J.S.A. 2C:30- 6(1))	Pending PC determination
4/25/18	SC-2018-179	Township Police Officer R. Morales	Official Misconduct (N.J.S.A. 2C:30-2(a) and (b)); Harassment (N.J.S.A. 2C:33-4A)	Pending PC determination
4/25/18	S-2018-180	Township Manager William Broughton	Official Misconduct (N.J.S.A. 2C:30-2(a) and (b))	Pending PC determination
4/27/18	SC-2018-7977	Township Fire Dept.	Failure to wear	Pending PC determination

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4/27/18	SC-2018-7978	Donald Wynne	seatbelt (N.J.S.A. 39:3-76-2f)	Pending PC determination
4/27/18	SC-2018-7979	Township Fire Dept. Donald Wynne	Failure to properly signal (N.J.S.A. 39:4-126)	Pending PC determination
4/27/18	SC-2018-7980	Township of Teaneck	Failure to inspect (N.J.S.A. 39:8-1)	Pending PC determination
4/27/18	SC-2018-7343	Township of Teaneck	Failure to display inspection sticker (N.J.S.A. 39:8-6)	Pending PC determination
4/27/18	SC-2018-7344	Teaneck Police Officer Michael Chaloub	Careless driving (N.J.S.A. 39:4-97)	Pending PC determination
5/1/18	SC-2018-7367	Teaneck Police Officer Michael Chaloub	Failure to use directional signal (N.J.S.A. 39:3-76.2(f))	Pending PC determination
5/1/18	SC-2018-7368	Teaneck Police Lt. Thomas Tully Jr.	Interference with public officials (Code Sec. 26-18)	Pending PC determination
5/1/18	S-2018-260	Teaneck Police Lt. Thomas Tully Jr.	Interference with public officials (Code Sec. 26-18)	Pending PC determination
5/1/18	S-2018-198	Teaneck Police Lt. Thomas Tully Jr.	Official Misconduct (N.J.S.A. 2C:30-2(a) and (b))	Pending PC determination
5/1/18	SC-2018-7369	Township of Teaneck	Harassment (N.J.S.A. 2C:33-4A & C); pattern of official misconduct (N.J.S.A. 2C:30-7A)	Pending PC determination
5/1/18	SC-2018-7370	Township of Teaneck	Failure to display valid inspection sticker (N.J.S.A. 39:8-6)	Pending PC determination
5/1/18	SC-2018-7370	Township of Teaneck	Failure to inspect vehicles (N.J.S.A.)	Pending PC determination

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5/1/18	SC-2018-7371	Township of Teaneck	39:8-1) Failure to display valid inspection sticker (N.J.S.A. 39:8-6)	Pending PC determination
5/1/18	SC-2018-7372	Township of Teaneck	Failure to inspect vehicles (N.J.S.A. 39:8-1)	Pending PC determination
5/1/18	SC-2018-7373	Township of Teaneck	Failure to display valid inspection sticker (N.J.S.A. 39:8-6)	Pending PC determination
5/1/18	SC-2018-7374	Township of Teaneck	Failure to inspect vehicles (N.J.S.A. 39:8-1)	Pending PC determination
5/1/18	SC-2018-7375	Township of Teaneck	Failure to display valid inspection sticker (N.J.S.A. 39:8-6)	Pending PC determination
5/1/18	SC-2018-7376	Township of Teaneck	Failure to inspect vehicles (N.J.S.A. 39:8-1)	Pending PC determination
5/1/18	SC-2018-7377	Township of Teaneck	Failure to display valid inspection sticker (N.J.S.A. 39:8-6)	Pending PC determination
5/1/18	SC-2018-7378	Township of Teaneck	Failure to inspect vehicles (N.J.S.A. 39:8-1)	Pending PC determination
5/1/18	SC-2018-7357	Township Police Officer Jason Hosey	Failure to use signals (N.J.S.A. 39:4-126)	Pending PC determination
5/1/18	SC-2018-7358	Township Police Officer Jason Hosey	Failure to wear seatbelt (N.J.S.A. 39:3-76.2(f))	Pending PC determination
5/1/18	SC-2018-7347	Township of Teaneck	Failure to abate stagnant water (Code Sec. 21-19)	Pending PC determination

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5/1/18	SC-2018-7348	Township of Teaneck	Removal of stumps (Code Sec. 37-21)	Pending PC determination
5/1/18	SC-2018-7349	Township of Teaneck	Failure to keep exterior of structure in good repair Code Sec. 29A- 23)	Pending PC determination
5/1/18	SC-2018-7350	Township of Teaneck	Securing vacant buildings (Code Sec. 29A-23.1)	Pending PC determination
5/1/18	SC-2018-7351	Township of Teaneck	Structural soundness/general maintenance violation (Code Sec. 29A-24)	Pending PC determination
5/1/18	SC-2018-7352	Township of Teaneck	Structural soundness/foundation walls (Code Sec. 29A- 25)	Pending PC determination
5/1/18	SC-2018-7353	Township of Teaneck	Basement/cellar maintenance- damp free (Code Sec. 29A- 26)	Pending PC determination
5/1/18	SC-2018-7354	Township of Teaneck	Exposed surfaces susceptible to decay (Code Sec. 29A-30)	Pending PC determination
5/1/18	SC-2018-7355	Township of Teaneck	Dwelling must be maintained weather/water tight Code Sec. 29A-31)	Pending PC determination
5/1/18	SC-2018-7356	Township of Teaneck	All signs be maintained in good repair (Code Sec. 29A-16)	Pending PC determination
5/1/18	SC-2018-7362	Township Police Officer Robert Mennert	Failure to wear seatbelt (N.J.S.A. 39:3-	Pending PC determination

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5/1/18	SC-2018-7363	Township Police Officer Robert Mennert	76.2(f) Failure to use signals (N.J.S.A. 39:4-126)	Pending PC determination
5/1/18	SC-2018-7364	Township of Teaneck	Failure to make repairs Code Sec. 29A-31)	Pending PC determination
5/1/18	SC-2018-7365	Township of Teaneck	Failure to inspect (Code Sec. 39:8-1)	Pending PC determination
5/3/18	SC-2018-7382	Teaneck Police Detective Harold Clark	No front plate (N.J.S.A. 39:3-33)	Pending PC determination
5/3/18	SC-2018-7383	Teaneck Police Detective Harold Clark	No rear bumper (N.J.S.A. 39:3-33)	Pending PC determination
5/3/18	SC-2018-7385	Township of Teaneck	Improper parking over white line	Pending PC determination
5/3/18	SC-2018-7386	Township of Teaneck	Failure to inspect (N.J.S.A. 39:8-1)	Pending PC determination
5/3/18	SC-2018-7379	Teaneck Police Detective Harold Clark	Unsafe vehicle/no rear bumper (N.J.S.A. 39:3- 44)	Pending PC determination
5/3/18	SC-2018-7380	Teaneck Police Detective Harold Clark	Parking restrictions (Code Sec. 36-32.15)	Pending PC determination
5/3/18	SC-2018-7387	Teaneck Health Dept. Curtiss Caviness	Parking over painted white line (N.J.S.A. 36- 32.15(b))	Pending PC determination

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Exhibit 2

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William F. Rupp, Esq.

(ID # 002891975)

WINNE, BANTA, BASRALIAN & KAHN, P.C.

Court Plaza South-East Wing

21 Main Street, Suite 101

Hackensack, New Jersey 07601

(201)487-3800

Attorneys for Defendants, Township of Teaneck and

Issa Abbasi, Teaneck's Custodian of Records

TOWNSHIP OF TEANECK and ISSA
 ABBASI, TEANECK'S CUSTODIAN
 OF RECORDS

Plaintiffs,

v.

ELIE C. JONES

Defendant.

SUPERIOR COURT OF NEW JERSEY
 BERGEN COUNTY:
 CHANCERY DIVISION

DOCKET NO: C-14-17

Civil Action

CERTIFICATION OF
 JASON CASTLE

JASON CASTLE, of full age, hereby certifies and says:

1. I am an elected member of the Township Council of the Township of Teaneck and have held such elected position since July 1, 2014.
2. The Defendant, Elie C. Jones, in the within matter had filed a *pro se* complaint against the Township of Teaneck, the Teaneck Police Department and Lt. Thomas Tully in the Superior Court of New Jersey, Bergen County, Law Division, Docket No. BER-L-4596-16.
3. We were advised by our attorneys that Mr. Jones had offered a settlement of the aforesaid matter for the sum of \$10,000.00. Based on the experience with Mr. Jones in connection with a previous lawsuit instituted against the Township of Teaneck and the Teaneck Public Library, the Council rejected said offer at a meeting held on November 14, 2016 and advised our attorneys to notify Mr.

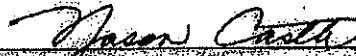
FILED, Clerk of the Appellate Division, February 28, 2018, A-000840-17, AMENDED

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Jones of such rejection.

4. I understand that the Township Attorneys notified Mr. Jones of the rejection of his settlement proposal on or about November 15 or 16, 2016. Immediately thereafter the then Acting Township Clerk, Issa Abbasi, advised the Township Council of the excessive number of OPRA requests being filed by Mr. Jones.
5. Immediately after the Council meeting held on January 4, 2017, I approached Mr. Jones to ask if he would be willing to prioritize his OPRA requests so that the Township could comply in a manner most convenient to his needs at which point Mr. Jones admitted to filing OPRA requests to interrupt the Township's operations.

I hereby certify that the foregoing statements are true. I am aware that if any of the foregoing statements are willfully false I am subject to punishment.


Jason Castle

Dated: 2/8/17

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EXHIBIT

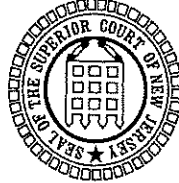
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SUPERIOR COURT OF NEW JERSEY

BERGEN VICINAGE
Bergen County Justice Center
Suite 425
Hackensack, New Jersey 07601-7699
(201) 527-2700
Fax (201) 371-1111

Laura A. Simoldoni
Trial Court Administrator



March 2, 2018

Mr. Ellie C. Jones
1681 Teaneck Road
Teaneck, NJ 07666

Re: Your Fax Dated March 1, 2018

Dear Mr. Jones:

I am in receipt of your fax dated March 1, 2018 that I received on March 2, 2018. Your fax does not accurately depict the facts surrounding your interactions with the Bergen Vicinage staff. As you are aware, I became your liaison with the Vicinage in December of 2016 due to the fact that while you were meeting with chancery division staff, you became angry, pounded your fist against the customer service glass window and used profanity. From December of 2016 through February 28, 2018, I have met with you face to face during scheduled appointments on 31 occasions. You had also made an additional 24 appointments with me that you failed to appear at and failed to notify me that you were not keeping your appointment. The above information does not also capture the approximate 5 to 10 calls per day you make to the courthouse or your daily visits to the courthouse on days when you have not scheduled an appointment to meet with me.

As you know, in January of 2018, I became your liaison with the Family Division due to you being rude to staff. I have personally sat with you when you filed multiple amendments to your TRO, and your multiple order to show cause actions.

As you know on February 27, 2018, we had an appointment at the Domestic Violence Office whereby you again amended your TRO complaint. On February 27, 2018, you remained in the courthouse from 9:00 am until 4:20 pm and you came to my office on 8

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occasions. As you normally do when you visit my office, you drop off multiple letters to various judges and you are consistently on your cell phone telling me that you are either speaking to Chief Justice Stuart Rabner or Judge Glenn Grant. While you were on your cell phone with the Chief Justice, you said the following "Yes Stuart, fire Laura Simoldoni. She is not doing what you told her to do." You have also told me that you wanted to relay court procedural messages to me from Judge Grant and the Chief Justice on how I should not follow proper court procedures and rules. As I told you, I cannot violate any rules or procedures and the Chief Justice or Judge Grant would call me directly if there were an issue or concern. At one of your visits to my office on February 27, 2018, you again performed the "Laura Simoldoni" song and dance. Your song and dance includes you singing my name, waiving your arms and dancing about. As I have told you in the past, and I wish to reiterate, I personally find this behavior disturbing and I ask you to please refrain from performing this disturbing dance in the future.

In your letter, you claim that I have somehow discriminated against you and have failed to investigate complaints you have made to me. These allegations are false. I have provided you with access to the court and have been your liaison for your chancery and family matters due to your rude behavior with my staff. As I have written to you in past correspondences, you have said inappropriate things to me at past appointments. When you have told me that you had a complaint about staff, you have refused to provide me with any names or any details of any incident. You have told me on numerous occasions that "Trenton, the ACJC and a secret investigator" are looking into your complaints and for that reason you will not provide me with any factual information regarding alleged complaints.

Regarding the "fax" incident, your letter fails to state that you had called me that morning to say that you were coming to the courthouse at 12:30 pm to pick up the correspondence. You failed to keep this appointment and you failed to notify me that you were not going to keep this appointment. You called me at approximately 3:15 pm to say that you were too busy to pick up the correspondence at 12:30 pm and that you were now on your way to the courthouse to meet with a "secret investigator." You asked me to tape the correspondence to the front door of my office so you could pick it up. I told you that I would not tape any correspondence to a door in a hallway and that you could either pick up the correspondence by 4:30 pm or you could pick it up at our next appointment which was for March 2, 2018 at 9:00 am. Your reply to me was "You are here to serve me. Get off your butt and fax it to me now." I told you I was ending your phone call and that I would not fax the correspondence. You told me "Get Rice the law clerk to fax it to me." I replied "No."

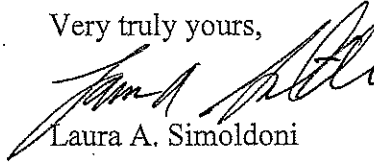
At approximately 4:05 pm, you came to my office and I gave you the correspondence. You confirmed your appointment with me for March 2, 2018 at 9:00 am. It should be noted that I was at the Domestic Violence Office at 9:00 am today waiting for you and you later called my office to cancel the appointment.

I will continue to assist you on your court visits to the Bergen Vicinages as I have done so since December 2016. Due to your continued rude and disruptive behavior to staff, I

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will continue to require you to make an appointment in advance of your visits to the courthouse for court matters.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Laura A. Simoldoni', written over the typed name.

Laura A. Simoldoni

LAS/ms

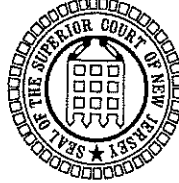
c: Hon. Bonnie J. Mizdol. A.J.S.C.

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SUPERIOR COURT OF NEW JERSEY

BERGEN VICINAGE
Bergen County Justice Center
Suite 425
Hackensack, New Jersey 07601-7699
(201) 527-2700
Fax (201) 371-1111

Laura A. Simoldoni
Trial Court Administrator



March 5, 2018

Mr. Ellie C. Jones
1681 Teaneck Road
Teaneck, NJ 07666

Re: Your Letter Dated March 5, 2018

Dear Mr. Jones:

I am in receipt of your letter dated March 5, 2018 that you hand delivered to my office at approximately 3:50pm. Your letter states that the Domestic Violence office only requires you to affix postage to the numerous mailings that the DV office sends on your behalf to your sister Ms. Alston and that we do not require Ms. Alston to affix postage on the mail that is sent to you on her behalf. I spoke to the DV office staff and confirmed that your allegation is incorrect and both parties are required to affix proper postage.

Your letter alleges that you have made numerous complaints to me regarding staff and that I have not investigated same. This allegation is also false. When you have told me that you had a complaint about staff, you have refused to provide me with any names or any details of any incident. You have told me on numerous occasions that "Trenton, the ACJC and a secret investigator" are looking into your complaints and for that reason you will not provide me with any factual information regarding alleged complaints.

It should be noted that on March 5, 2018, approximately 10 minutes after you left my office, you called me to say that you were filing a criminal complaint at the Sheriff's Office against a DV staff person and that said DV person slammed a door on you and screamed at you. You also told me that you had a video recording of the incident. I asked you why you did not inform me that you were going to the DV office and you replied that you go to the DV office every day to pick up forms and it was not

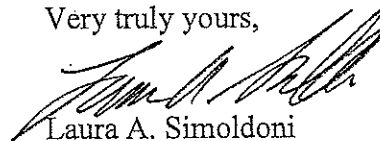
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necessary for me to go with you to pick up more forms. I asked you to provide me your complaint in writing along with a copy of the alleged video. You replied "Yes" and hung up the phone. I immediately went to the Sheriff's Department and you were not present. I then went to the DV office and spoke with staff. I was told that you entered the DV office, went around a customer who was standing in front of the customer service window, waived your arms and yelled over the window at one of the supervisors in the office that you wanted paperwork. You were told that you had to wait until the customer who was there before you was assisted and that a staff member would be speaking with you momentarily. You replied "OK" and then turned around and left the office.

As you know, in January of 2018, I became your liaison with the Family Division due to you being rude to staff. I have personally sat with you when you filed multiple amendments to your TRO, and your multiple order to show cause actions. I will continue to assist you on your court visits to the Bergen Vicinages as I have done so since December 2016. Due to your continued rude and disruptive behavior to staff, I will continue to require you to make an appointment with me in advance of your visits. This will now also include when you need to pick up additional blank forms at the DV office. Please note that you MUST call in advance and make an appointment with me before showing up unannounced at the courthouse seeking forms or assistance with court staff. If you need additional multiple copies of blank forms, I will mail them to your home upon request.

Very truly yours,



Laura A. Simoldoni

LAS/ms

c: Hon. Bonnie J. Mizdol. A.J.S.C.

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RUSH

MR. ELIE C. JONES

1681 TEANECK ROAD

TEANECK, N 07666-3732

1-201-837-3745 OR 1-201-654-1157

FAXED & MAILED TO ALL PSRTIES

MARCH 5, 2018

FV-02-678-18 & FV-02675-18 MOTIONS FILING & SERVICE

To: LAURA Simoldoni
3/5/18

ATTN: ASSIGNMENT JUDGE BONNIE J. MIZDOL AND TRIAL COURT ADMINISTRATOR LAURA SIMOLDONI AND CHIEF JUSTICE STUART RABNER AND JUDGE GLENN GRANT – A.J.S.C. & FAMILY DIVISION MANAGER DIANA – MOSKAL

RE: TERESA ALSTON'S FILING OF A MOTION WITHIN THE DV UNIT ON 2/28/2018 AND THE DV UNIT PAYING FOR THE POSTAGE AS KELLY BIGELOW AND TRACY ANDOLINI REFUSED TO DO FOR ELIE JONES –

THIS FAILURE NEEDS TO BE INVESTIGATED AND WHY IS ONE PERSON BEING ALLOWED TO FILE A MOTION AND NOT PAY THE POSTAGE FOR THE SERVICE OF THE MOTION TO THE OPPOSING PARTY AND MR. JONES IS BEING FORCED TO PAY POSTAGE WHEN HIS ADVERSARY TERESA ALSTON IS BEING ALLOWED TO SUBMIT MOTIONS WITHOUT PAYING FOR THE POSTAGE AS IS REQUIRED.

I WOULD LIKE TO KNOW WHY IS IT THAT ELIE C. JONES IS BEING TURNED AWAY FROM THE DV UNIT WHEN HE IS FILING A MOTION WITHOUT POSTAGE BUT TERESA ALSTON CAN GET AWAY WITH FILING A MOTION WITHOUT PAYING POSTAGE AND THE POSTAGE IS BEING PAID FOR BY THE FAMILY DIVISION OR DV UNIT OR THE JUDICARY, THIS TO ME SEEMS LIKE A CLEAR CASE OF BIAS OR FAVORITISM OF ONE PARTY OVER THE OTHER PARTY. MAINLY ALLOWING TERESA A. ALSTON TO GET AWAY WITH NOT PAYING THE PROPER POSTAGE DUE TO SUBMIT MOTIONS TO MR. ELIE C. JONES AS REQUIRED.

ELIE C. JONES HAS BEEN REQUIRED TO AFFIX HIS OWN POSTAGE TO ALL MOTIONS TO BE SERVED UPON HIS ADVERSARY AND FOR RETURN STAMPED DOCUMENTS TO HIMSELF,

JUDICIARY, TRENTON, CHIEF JUSTICE, LAURA SIMOLDONI AND JUDGE GLENN GRANT AND JUDGE CHIEF JUSTICE STUART RABNER, PLEASE RESPOND TO ME AND ADVISE WHY THIS IS HAPPENING TO ELIE C. JONES AND WHY THIS TYPE OF FAVORITISM OR BIAS TOWARDS MR. ELIE C. JONES IS OCCURRING.

RULES ARE RULES AND THEY SHOULD BE FOLLOWED AND OR ADHERED TO BY THE JUDICIARY EMPLOYEES UNILATERALLY AND FOR ALL LITIGANTS AND NOT BENT OR FAVORED FOR ONE PARTICULAR LITIGANT.

FOR THIS AND OTHER REASONS – THIS IS ANOTHER EXAMPLE AS TO WHY A CHANGE OF VENUE IS REQUESTED AND REQUIRED IN THIS MATTER. ELIE C. JONES HAS HAD MANY ISSUES OF BIAS, INTIMIDATION, HARASSEMENT AND REFUSAL TO FOLLOW JUDICIARY PROTOCOL AND PROCEDURES BY THE DOMESTIC VIOLENCE TEAM LEADERS MAINLY TRACY ANDOLINI. I HAVE MADE SEVERAL COMPLAINTS TO LAURA SIMOLDONI THAT HAVE BEEN FLAT OUT IGNORED AND SHE HAS FAILED TO PROPERLY INVESTIGATE MY COMPLAINTS THAT HAVE MERIT AND LAURA SIMOLDONI HAS FAILED TO ADVISE TRENTON OF THE SITUATION AND MY COMPLAINTS AS I HAVE REQUESTED THAT SHE DO FOR MONTHS.

PLEASE RESPOND TO THIS LETTER IN WRITING AS TO THE RESULTS OF THE JUDICIARY'S INVESTIGATION INTO THIS COMPLAINT.

THANK YOU,

ELIE C. JONES

LITIGANT

Elie C. Jones 3/5/2018

CC: FILE – CHIEF JUSTICE STUART RABNER, LAURA SIMOLDONI, GLENN GRANT J.S.C BONNIE J. MIZDOL AND

THE FAMILY DIVISION MANAGER DIANA MISKAL, TERESA A. ALSTON AND ELIE JONES AND ATTORNEY FOR STATE OF NJ AND BERGEN COUNTY PROSECUTOR INVESTIGATION UNIT

STATE ATTORNEY GENERAL – GREWAL – PLEASE CONDUCT AN INVESTIGATION OF THE BCJC

→ Simoldoni - Copy
→ Simoldoni & Mizdol Copy/Copies

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SUPERIOR COURT OF NEW JERSEY

BERGEN VICINAGE

Bergen County Justice Center
Suite 425
Hackensack, New Jersey 07601-7699
(201) 527-2700
Fax (201) 371-1111

Laura A. Simoldoni
Trial Court Administrator



March 9, 2018

Mr. Ellie C. Jones
1681 Teaneck Road
Teaneck, NJ 07666

Re: Your Email of March 6, 2018

Dear Mr. Jones:

I am in receipt of your email that was sent to me at 12:27 a.m. on March 6, 2018. My March 5, 2018 letter to you already responded to your dissatisfaction with the staff and supervisor in the Domestic Violence Office. It should be noted that you told me on March 5, 2018, that you had a video of the alleged interaction with the supervisor and I asked you to send it to me for review. I have not yet received any video from you. Your letter states that you have complained to me on a number of occasions about the supervisor and about her behavior towards you. I personally have sat with you in the DV office on four occasions over the past 30 days and at no time have you ever complained about the supervisor or any other members of the DV staff. You also have never complained about DV staff during your numerous daily visits and multiple daily phone calls to the courthouse prior to March 5, 2018.

On March 6, 2018, you called my office on six occasions and you spoke directly to me on three of those occasions. The first time you spoke to me was at 12:28 pm, and you sang your "Laura Simoldoni" song to me and I asked you to please refrain from doing so. You responded to me "That is too bad. I can do whatever I want to do and there is nothing you can do about it." I told you your behavior was unacceptable and that if you need anything from the court to put it in writing to me. You laughed and said "I can do whatever I want to do. There is nothing you can do about it." I told you that I was hanging up the phone due to your inappropriate behavior and that you can mail or fax me

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your request and I will respond accordingly. At 12:35 pm you called me again. You were laughing and said that you were coming to the courthouse to file criminal charges against me and you asked me where to file them. I told you that you file them where you normally file all of your criminal complaints. You said that you were coming to the courthouse now and I told you that you needed to make an appointment with me in advance. You told me "I don't need to make an appointment with you anymore. I will see whoever I want to see without your approval and there is nothing you can do about it." At 12:50 pm you called me again. You shouted at me the following: "You better get your superiors involved! You better call Trenton! You cannot be my liaison anymore! Do you hear me! You better call Trenton and alert your superiors!" I told you that you needed to put your request to me in writing and I will respond to you in writing. You then hung up the phone.

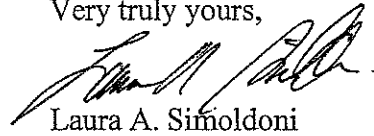
On March 8, 2016, you showed up at the DV Office and demanded additional Motion forms and Order to Show Cause forms. Staff directed you to my letter of March 5, 2018, whereby you were notified that due to your unprofessional and disruptive behavior, you must call me in advance and make an appointment with me to meet with staff or pick up additional copies of forms. I told you that I would be happy to mail or fax you additional copies of forms you are requesting. After leaving the DV Office you came to my office and said to me "I refuse to speak with you. Trenton is removing you as my liaison. I am going to file criminal charges against you. I already filed criminal charges against you." You then said that the DV staff sent you to my office to pick up additional forms. I asked you if you received my March 5, 2018 letter directing you to contact me prior to visiting the DV office. You said you were not sure if you received the correspondence, so I provided you with an additional copy of my letter. I asked you to meet me at the door to the DV office so I can provide you with the forms. As you followed me down the hallway, you were loud and rude saying to me: "I filed criminal charges against you. You can't stop me from going to the DV office. I am calling Trenton! They will remove you!" I told you to stop your disruptive behavior. I then went into the DV office and picked up the motion forms and order to show cause forms and provided them to you. I advised you again that in the future you must contact my office in advance to make an appointment with me to pick up forms or meet with DV staff. You replied, "Trenton is going to replace you as my liaison."

This letter is to advise you that your continued unprofessional and disruptive behavior cannot and will not be tolerated. Increasingly, your telephone calls and visits to the courthouse have become lengthy and time consuming, prohibiting staff from serving other customers with their case related needs. The volume and extent of your calls and visits has had the effect of disrupting the work of the courts. Therefore, your telephone calls will no longer be accepted by Judiciary staff. Personal appearances will only be allowed if there is a required court appearance or if you make an appointment with my office in writing in advance. You may fax your requests to (201) 371-1111. We will still respond to your inquiries. However, any and all future communications must be made in writing to me via fax or mail. Copies of this letter are being shared with senior managers, with instructions to advise their staff to terminate your call upon receipt, or terminate any conversation should you appear personally, after reiterating the requirement that your

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communication be in writing.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Laura A. Simoldoni', written over a horizontal line.

Laura A. Simoldoni

LAS/ms

c: Hon. Bonnie J. Mizdol, A.J.S.C.
Bergen Senior Managers