

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION – CIVIL PART

BURLINGTON COUNTY

JOSEPH FABOZZI,

Plaintiff,

v.

JENNIFER OLLAND; TOWNSHIP OF MOUNT LAUREL, et al.,

Defendants.

DOCKET NO.: BUR-L-2334-25

PLAINTIFF'S INTERROGATORIES

TO DEFENDANT JENNIFER OLLAND

Pursuant to **Rule 4:17-1 of the New Jersey Rules of Court**, Plaintiff Joseph Fabozzi propounds the following Interrogatories to Defendant Jennifer Olland.

Defendant Jennifer Olland shall answer these Interrogatories fully and under oath within the time required by the Rules of Court.

These Interrogatories are continuing in nature. If Defendant Jennifer Olland obtains additional information responsive to any interrogatory after serving

answers, Defendant shall supplement the answers in accordance with the New Jersey Rules of Court.

DEFINITIONS

“Classroom Aide” or “IEP Aide” means any individual assigned to assist or supervise a student pursuant to an Individualized Education Program (IEP), including any aide assigned to [REDACTED] [MINOR CHILD] at Hillside Elementary School during the 2021–2022 school year.

“Communication” means any oral, written, or electronic transmission of information, including but not limited to conversations, meetings, telephone calls, voicemail messages, emails, text messages, instant messages, social media messages, letters, memoranda, or any other exchange of information between two or more persons, whether conducted through devices or systems owned or monitored by the Mount Laurel School District or through privately owned devices.

“Document” means any writing, recording, or electronically stored information, including emails, reports, notes, memoranda, body-camera recordings, text messages, letters, and any other form of recorded information.

“Complaint” means any allegation, report, accusation, or communication asserting misconduct, criminal conduct, harassment, or other improper behavior, including

any citizen criminal complaint, affidavit of probable cause, or written statement submitted to the Mount Laurel Police Department or the Mount Laurel Municipal Court.

“Civil lawsuit” means the action filed by Plaintiff Joseph Fabozzi against Defendant Jennifer Olland in the Superior Court of New Jersey, Ocean County, under Docket No. OCN-L-002231-22.

“Identify,” when referring to a person, means to state the person’s full name, last known address, employer, and position or relationship to the Mount Laurel School District. When referring to a communication, “identify” means to state the date, method of communication (including but not limited to email, text message, telephone, or in-person conversation), the persons involved in the communication, and the subject matter of the communication.

“Mount Laurel School District” means the public school district located in Mount Laurel Township, Burlington County, New Jersey, including but not limited to Hillside Elementary School, and includes all administrators, teachers, classroom aides, staff members, employees, agents, contractors, volunteers, and representatives of the district acting in the course of their duties or in connection with school activities.

“Report” means any allegation, complaint, statement, communication, or referral made to the Mount Laurel School District, the Mount Laurel Police Department, the New Jersey Division of Child Protection and Permanency (DCPP), or any other authority asserting that Plaintiff Joseph Fabozzi engaged in misconduct, harassment, or inappropriate conduct.

“School Personnel” means any administrator, teacher, counselor, classroom aide, paraprofessional, staff member, employee, agent, contractor, or representative of the Mount Laurel School District.

**PLAINTIFF’S INTERROGATORIES TO DEFENDANT JENNIFER
OLLAND**

1. State whether you told Terrance Campbell of the New Jersey Division of Child Protection and Permanency that Plaintiff Joseph Fabozzi stated at a Sweet Sixteen party that “the girls will be so fuckable when they turn 18.”

See Exhibit 1: YouTube Video Terrance Campell at Waretown PD:

<https://youtu.be/8caqKfCAJV0>

See Exhibit 2: Transcript Campbell at Waretown PD

2. State every fact upon which you base your claim that Plaintiff Joseph Fabozzi stated at a Sweet Sixteen party that “the girls will be so fuckable when they turn 18.”

See Exhibit 1: YouTube Video Terrance Campell at Waretown PD:

<https://youtu.be/8cagKfCAJV0>

See Exhibit 2: Transcript Campbell at Waretown PD

3. Identify every person to whom you communicated that Plaintiff Joseph Fabozzi touched children or engaged in inappropriate conduct concerning children prior to the Hillside Elementary School referral to the New Jersey Division of Child Protection and Permanency.
4. Identify every communication, you had during the 2021-2022 school year with any classroom aide or paraprofessional assigned to assist [MINOR CHILD] [MINOR CHILD] pursuant to her Individualized Education Program (IEP) at Hillside Elementary School concerning Plaintiff Joseph Fabozzi.
5. Identify every communication you had with any School Personnel of the Mount Laurel School District concerning Plaintiff Joseph Fabozzi prior to the Mount Laurel School District making a referral to the New Jersey Division of Child Protection and Permanency.

6. State whether you communicated during the 2021-2022 school year with any employee or School Personnel of the Mount Laurel School District using privately owned cellular telephones, personal email accounts, or other devices not owned or monitored by the Mount Laurel School District, concerning Plaintiff Joseph Fabozzi.

7. Describe each attempt by the Burlington County Sheriff to serve you with the summons and complaint in civil lawsuit OCN-L-002231-22.

See Exhibit 17 Olland Evade Burlington County Sheriff

8. Describe each attempt by process server Dana Judge to serve you with the summons and complaint in civil lawsuit OCN-L-002231-22.

See Exhibit 4 Dana Judge Attempt 1

See Exhibit 5 Dana Judge Attempt 2

See Exhibit 6 Chat Dana Judge

See Exhibit 18 Affidavit of Service Olland

9. State whether the email address [EMAIL REDACTED] was used by you during 2022.

See Exhibits 7 and 8

See Exhibit 19 YouTube Video: https://youtu.be/WaoD_Rf_uLY

10.State the date on which you first learned that Plaintiff Joseph Fabozzi had filed civil lawsuit OCN-L-002231-22 against you.

11.Identify all facts and communications that led you to go to the Mount Laurel Police Department on November 3, 2022 after receiving the emails from Plaintiff Joseph Fabozzi concerning service of the summons and complaint in civil lawsuit OCN-L-002231-22.

See Exhibits 7 and 8

12.Identify all facts and communications that led you not to contact the Burlington County Sheriff's Office or process server Dana Judge concerning service of the summons and complaint in civil lawsuit OCN-L-002231-22 on November 3, 2022.

See Exhibits 4, 5, 6, 17, 18

13.Identify all facts and communications that led you to not inform Officer Justin Turino during your first visit to the Mount Laurel Police Department on November 3, 2022 at approximately 11:16 a.m. that Plaintiff Joseph Fabozzi had filed civil lawsuit OCN-L-002231-22 against you in the Superior Court of New Jersey, Ocean County.

14.State whether you spoke with Officer Justin Turino between your first visit to the Mount Laurel Police Department on November 3, 2022 at

approximately 11:16 a.m. and your second visit at approximately 12:54 p.m. concerning Plaintiff Joseph Fabozzi.

See Exhibit 19 YouTube Video: https://youtu.be/WaoD_Rf_uLY

See Exhibit 20 YouTube Video: <https://youtu.be/Risyijjs20o>

See Exhibit 21: Olland Turino Transcript 1254

15. State your understanding of the statement made to you by Officer Justin Turino at approximately 12:54 p.m. on November 3, 2022 during your conversation at the Mount Laurel Police Department:

“My best advice, if you want him to stop, you might have to contact the Burlington County Sheriffs.”

See Exhibit 20 YouTube Video: <https://youtu.be/Risyijjs20o>

See Exhibit 21: Olland Turino Transcript 1254

16. Identify every communication you had with Officer Sweely concerning Plaintiff Joseph Fabozzi on or before November 3, 2022.
17. Identify every communication you had with Prosecutor Matthew Weng prior to the harassment trial held on September 13, 2023.

18.State whether you reviewed with Prosecutor Matthew Weng any emails sent to you by Plaintiff Joseph Fabozzi prior to your testimony at the harassment trial held on September 13, 2023.

See Exhibits 7 and 8

19.State whether you reviewed with Prosecutor Matthew Weng any posts on social media, posted by Plaintiff Fabozzi, concerning a DCF memorandum and allegations of child abuse prior to the Harassment Trial held on September 13, 2023.

See Exhibit 9 Olland's Handwritten Statement

See Exhibit 10 Olland's Affidavit of Probable Cause

20.Identify every document, communication, or record you provided to Prosecutor Matthew Weng prior to the harassment trial held on September 13, 2023.

21. State all facts, documents, and communications supporting your statement in the November 3, 2022 handwritten statement and affidavit of probable cause that *“court custody mediation mentions that Joseph F. Fabozzi is not to ever be in the presence of my daughters,”* including your understanding of **Exhibit 22** the Parental Mediation Agreement dated May 3, 2022.

See Exhibit 9 Olland's Handwritten Statement

See Exhibit 10 Olland's Affidavit of Probable Cause

See Exhibit 22 Olland Dunnkosky Parental Mediation

22.State whether the Parental Mediation Agreement dated May 3, 2022 states:

“Joseph Fabozzi shall at no time be in the presence of either child unless both parents consent in advance.”

See Exhibit 9 Olland's Handwritten Statement

See Exhibit 10 Olland's Affidavit of Probable Cause

See Exhibit 22 Olland Dunnkosky Parental Mediation

23.State whether you instructed [MINOR CHILD] or [MINOR CHILD] to contact you if Plaintiff Joseph Fabozzi appeared at Joseph Dunnkosky's wedding, and if so identify the facts and communications concerning that instruction.

24.If you contend that Joseph Fabozzi should be prohibited from attending any future family event hosted by Joseph Dunnkosky that [MINOR CHILD] or [MINOR CHILD] may attend, state all facts, identify all documents, and describe all communications upon which you rely in support of that contention.

25. Identify every document, communication, or record supporting the allegations you made against Plaintiff Joseph Fabozzi in the harassment complaint filed on November 3, 2022.