

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – CIVIL PART
BURLINGTON COUNTY**

JOSEPH FABOZZI,

Plaintiff,

v.

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

Defendants.

Docket No.: BUR-L-2334-25

**PLAINTIFF’S FIRST SET OF INTERROGATORIES TO DEFENDANT
OFFICER SEAN PINKERY**

TO:

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APPLICABLE RULE OF COURT

Pursuant to Rule 4:17 of the New Jersey Rules of Court, Defendant Officer Sean Pinkery shall answer each of the following Interrogatories separately and fully, in writing and under oath, within the time prescribed by the New Jersey Rules of Court.

Each answer shall include all information known or reasonably available to Defendant after making a reasonable inquiry. If Defendant cannot answer an Interrogatory fully, Defendant shall answer it to the extent possible and explain why the remaining information cannot be provided.

These Interrogatories are continuing in nature. If Defendant obtains additional information after serving responses that renders any answer incomplete or incorrect, Defendant shall timely supplement the answer in accordance with the New Jersey Rules of Court.

INSTRUCTIONS

1. These Interrogatories are served pursuant to Rule 4:17 of the New Jersey Rules of Court.
2. Each Interrogatory shall be answered separately and fully, in writing and under oath.
3. Defendant shall provide all information within his personal knowledge and all information reasonably available to him after making a reasonable inquiry.
4. If Defendant cannot answer an Interrogatory fully, Defendant shall answer it to the extent possible and state:
 - a. The portion of the Interrogatory that cannot be answered;
 - b. The reason the Interrogatory cannot be answered fully;
 - c. The inquiry made to obtain the requested information; and
 - d. The identity of each person believed to possess the requested information.
5. If Defendant objects to any Interrogatory, Defendant shall state the specific factual and legal basis for the objection and answer every portion of the Interrogatory that is not subject to the objection.
6. A general objection, standing objection, or continuing objection shall not relieve Defendant of the obligation to answer each Interrogatory separately and fully.
7. If an answer refers to a person, Defendant shall identify that person by providing the person's full name, job title or position, employer, last known business address, telephone number, and email address, if known.
8. If an answer refers to a document or communication, Defendant shall identify it by stating:
 - a. The date;
 - b. The author or sender;
 - c. Every recipient, including any person copied;
 - d. The type of document or communication;
 - e. The general subject matter; and
 - f. The person or entity presently possessing or controlling it.

9. If Defendant relies upon a document, report, recording, policy, communication, electronically stored information, or other material when answering an Interrogatory, Defendant shall identify that material with enough detail to permit Plaintiff to locate and identify it.
10. If Defendant contends that any assumption or statement contained in an Interrogatory is inaccurate, Defendant shall identify the alleged inaccuracy and state the facts Defendant contends are accurate.
11. These Interrogatories are continuing in nature. Defendant shall timely supplement any answer that becomes incomplete or incorrect in accordance with the New Jersey Rules of Court.

PRIVILEGE LOG INSTRUCTION

If Defendant withholds any document, electronically stored information, communication, or other responsive information based upon attorney-client privilege, the work-product doctrine, or any other claimed privilege or protection, Defendant shall identify each withheld item in a privilege log.

For each withheld item, state:

- a. The date;
- b. The author or sender;
- c. Every recipient, including any person copied;
- d. The general subject matter of the document or communication, without revealing the allegedly privileged information itself;
- e. The type of document or communication, such as an email, memorandum, letter, text message, report, recording, or note;
- f. The specific privilege or protection claimed; and
- g. The factual basis for the claimed privilege or protection sufficient to permit Plaintiff and the Court to evaluate the claim.

DEFINITIONS

1. “Plaintiff” means Joseph Fabozzi.
2. “Defendant” or “you” means Defendant Officer Sean Pinkery.
3. “Township” means the Township of Mount Laurel, together with its departments, agencies, boards, commissions, officers, employees, attorneys, agents, and representatives.
4. “Mount Laurel Police Department” or “MLPD” means the Mount Laurel Police Department.

5. "Criminal Discovery" means every document, electronically stored information, report, supplemental report, narrative, CAD report, audio recording, video recording, body-worn camera recording, photograph, statement, dispatch record, email, memorandum, and every other item of information produced, maintained, or subject to production in connection with the events that are the subject of these Interrogatories.
6. "Document," and "Identify" shall be construed broadly and consistently with the New Jersey Rules of Court.
7. "**Communication**" means every oral, written, electronic, or recorded exchange of information, whether formal or informal, including but not limited to conversations, meetings, interviews, telephone calls, voicemail messages, text messages, emails, letters, memoranda, reports, radio transmissions, dispatch communications, body-worn camera communications, instant messages, social media messages, and every other form of transmitting information between two or more persons.
8. "**You were at a Sweet 16 party, correct?**" means the following statement made by DCP&P Investigator Terrance Campbell during his March 2, 2022 interview of Plaintiff, as reflected in Exhibit 2, entitled "March 2, 2022, 12:40 p.m. – Transcript of Interview at Waretown Police Department," at Page 4, Lines 23–25, and Page 5, Lines 1–12:

Page 4, Lines 23–25

23. MR. FABOZZI: -- she made a false allegation

24. against me.

25. MR. CAMPBELL: This is an investigation.

Page 5, Lines 1–12

1. She did make a false allegation. This is what

2. happened. She overheard her mother have an adult

3. conversation where you stated -- you were at a Sweet 16

4. party, correct?

5. MR. FABOZZI: No, because I was not at the

6. Captain's Inn.

7. MR. CAMPBELL: Okay. They're saying you were

8. at a Sweet 16 party and you made mention that

9. "the girls will be so fuckable when they turn 18."

10. MR. FABOZZI: That is not true because I
11. wasn't at that party at the Captain's Inn because I
12. don't like spending money.

9. "She said, oh, her mommy stated it," means the following statement made by DCP&P Investigator Terrance Campbell during his March 2, 2022 interview of Plaintiff, as reflected in Exhibit 2, entitled "March 2, 2022, 12:40 p.m. – Transcript of Interview at Waretown Police Department," at Page 4, Lines 1–11:

Page 4, Lines 1–11

1. MR. CAMPBELL: So whenever we get a call of
2. child abuse or neglect, we have to go out and interview
3. the children. When interviewing the child, the child
4. disclosed to me that she believes you touches (sic)
5. children, (interference), she never observed you touch
6. anyone.
7. Then when later on questioned, I ask her,
8. well, how does she know. She said, oh, her mommy
9. stated it. So, I still have to ask you because
10. (interference), so that's why I'm asking you, have you
11. ever had any type of contact (interference)?

INTERROGATORIES

Interrogatory No. 1:

State whether you contacted DCP&P Investigator Terrance Campbell at any time concerning the allegations Plaintiff reported to you on March 3, 2022. If so, state the date, time, method of communication, and substance of each communication. See Exhibits 2 and 3.

Interrogatory No. 2:

State whether you contacted any member of the Ocean Township Police Department concerning the allegations Plaintiff reported to you on March 3, 2022. If so, identify each person contacted and describe each communication. See Exhibits 2 and 3.

Interrogatory No. 3:

Identify every investigative step you took in response to Plaintiff's March 3, 2022 request that Defendant Jennifer Olland be investigated for allegedly making false allegations of child abuse against him.

Interrogatory No. 4:

If you did not contact DCP&P Investigator Terrance Campbell before declining Plaintiff's request to file a citizen's complaint, state every reason why you did not do so.

Interrogatory No. 5:

If you did not contact the Ocean Township Police Department before declining Plaintiff's request to file a citizen's complaint, state every reason why you did not do so.

Interrogatory No. 6:

Identify every person with whom you discussed Plaintiff's March 3, 2022 request to file a citizen's complaint before deciding to decline that request.

Interrogatory No. 7

Identify every fact you relied upon in deciding to decline Plaintiff's request to file a citizen's complaint.

Interrogatory No. 8

Identify every document you reviewed before deciding to decline Plaintiff's request to file a citizen's complaint.

Interrogatory No. 9

Identify every communication including emails, text messages, telephone calls, in-person conversations, and radio communications you had with any member of the Mount Laurel Police Department concerning Plaintiff's March 3, 2022 request to file a citizen's complaint.

Interrogatory No. 10

Identify every communication you had with Defendant Jennifer Olland concerning Plaintiff or Plaintiff's March 3, 2022 request to file a citizen's complaint before or after March 3, 2022.

Interrogatory No. 11

Identify every communication you had with any employee or representative of the Department of Children and Families concerning Plaintiff.

Interrogatory No. 12

Identify every report, memorandum, email, note, recording, CAD entry, body-worn camera recording, or other document you created or received concerning Plaintiff on March 3, 2022.

Interrogatory No. 13

State whether Plaintiff asked you to investigate Defendant Jennifer Olland for allegedly making false allegations of child abuse against him. If so, describe in detail everything Plaintiff told you in support of that request.

Interrogatory No. 14

Identify every written policy, directive, general order, standard operating procedure, or training material that governed your handling of Plaintiff's request to file a citizen's complaint.

Interrogatory No. 15

State whether any Mount Laurel Police Department policy required you to investigate Plaintiff's allegations before declining his request to file a citizen's complaint. If so, identify the policy.

Interrogatory No. 16

State every reason you decided to direct Plaintiff to the Manahawkin Police Department instead of accepting his citizen's complaint.

Interrogatory No. 17

Identify every fact upon which you based your decision that Plaintiff should report the matter to the Manahawkin Police Department.

Interrogatory No. 18

Defendant Jennifer Olland testified under oath that the school, rather than she, reported the allegations concerning Plaintiff to the authorities because the school was a mandatory reporter. See Exhibits 5 through 8. State whether you investigated whether Defendant Jennifer Olland communicated allegations concerning Plaintiff to personnel employed by the Mount Laurel Board of Education before DCP&P Investigator Terrance Campbell received the complaint he reported having received on February 4, 2022. See Exhibit 3. If not, state every reason why you did not. If so, describe every investigative step you took and identify every document relating to that investigation.

Interrogatory No. 19

State whether, before declining Plaintiff's request to file a citizen's complaint on March 3, 2022, you knew that DCP&P Investigator Terrance Campbell had informed the Waretown Police Department that he had "conducted an interview with the victim and concluded the alleged complaint did not occur and stated this was no longer a criminal investigation." If your answer is yes, state:

- a. The date you first learned that information;
- b. The manner in which you learned that information;

- c. The identity of every person who communicated that information to you;
- d. Every document, report, email, memorandum, note, recording, or other communication upon which you rely in answering this Interrogatory; and
- e. Whether that information affected your decision to decline Plaintiff's request to file a citizen's complaint.

See Exhibit 3.

Interrogatory No. 20

Identify every fact you relied upon on March 3, 2022 that tended to support Plaintiff's claim that Defendant Jennifer Olland made false allegations against him.

Interrogatory No. 21

Identify every fact you relied upon on March 3, 2022 that tended to contradict Plaintiff's claim that Defendant Jennifer Olland made false allegations against him.

Interrogatory No. 22

If you contend you adequately investigated Plaintiff's allegations before declining his request to file a citizen's complaint, describe every investigative step you took and explain why you believe no additional investigative steps were necessary.

Interrogatory No. 23

State whether you investigated Plaintiff's statement that DCP&P Investigator Terrance Campbell told Plaintiff, "She said, oh, her mommy stated it," as defined herein. If not, state every reason why you did not investigate that information. If so, describe every investigative step you took. If not, state every reason why you did not investigate that information.

Interrogatory No. 24

State whether you investigated Plaintiff's statement that DCP&P Investigator Terrance Campbell told Plaintiff, "You were at a Sweet 16 party, correct?" as defined herein. If so, describe every investigative step you took. If not, state every reason why you did not investigate that information.

Interrogatory No. 25

State whether you investigated the origin of the allegations of child abuse against Plaintiff. If so, identify every investigative step you took to determine when, where, and from whom those allegations originated. If not, state every reason why you did not.

WHEREFORE, Plaintiff respectfully requests that Defendant Officer Sean Pinkery answer each of the foregoing Interrogatories separately and fully, in writing and under oath, within the time prescribed by Rule 4:17 of the New Jersey Rules of Court, after making a reasonable inquiry, and timely supplement any answer that becomes incomplete or incorrect.

Respectfully submitted,

JOSEPH FABOZZI

Plaintiff, Pro Se

[REDACTED]

[REDACTED]

Telephone: [REDACTED]

Email: [REDACTED]

Dated: July 17, 2026