

**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 MATTHEW WENG

Pursuant to **Rule 4:17 of the New Jersey Rules of Court**, Plaintiff Joseph Fabozzi requests that Defendant Matthew Weng answer the following Interrogatories separately and fully, in writing and under oath, within the time prescribed by the New Jersey Rules of Court.

INSTRUCTIONS

1. Each Interrogatory shall be answered separately and fully in writing under oath.
 2. If you object to any Interrogatory, state each specific ground for the objection and answer the remainder of the Interrogatory to the extent it is not objectionable.
 3. If you cannot answer an Interrogatory in full after making a reasonable inquiry, answer to the extent possible and explain why the remainder cannot be answered.
 4. If your answer is based upon information supplied by another person, identify that person.
 5. If you claim any privilege or protection from disclosure, identify the nature of the privilege asserted and provide sufficient information to permit Plaintiff to assess the claim without disclosing the privileged information itself.
 6. These Interrogatories are continuing in nature. If you obtain additional responsive information after serving your answers, you are requested to supplement your responses in accordance with the New Jersey Rules of Court.
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DEFINITIONS

1. **"You," "Your," "Defendant," or "Weng"** means Defendant **Matthew Weng**, individually and in his capacity as Municipal Prosecutor for the Township of Mount Laurel, together with any agents or persons acting on his behalf where applicable.
2. **"Plaintiff"** means Joseph Fabozzi.
3. **"Jennifer Olland" or "Olland"** means Defendant Jennifer Olland.
4. **"Officer Turino"** means Defendant Officer Justin Turino.
5. **"Harassment Trial"** means the trial conducted on **September 13, 2023**, in the Mount Laurel Municipal Court concerning the harassment complaint filed by Jennifer Olland against Plaintiff.
6. **"Citizen Complaint"** means Jennifer Olland's November 3, 2022 citizen complaint filed with the Mount Laurel Police Department that resulted in the harassment charge against Plaintiff.
7. **"Probable Cause"** means the determination made by the Municipal Court in connection with Jennifer Olland's November 3, 2022 citizen complaint.
8. **"Document"** means every written, printed, typed, recorded, electronically stored, or graphic matter of any kind, including emails, text messages, letters, notes, memoranda, reports, photographs, audio recordings, video recordings, electronic files, drafts, calendars, and social media communications.
9. **"Communication"** means every oral, written, electronic, or other exchange of information, including conversations, meetings, telephone calls, emails, text messages, letters, memoranda, and electronic messaging.
10. **"Identify,"** when referring to a person, means to state the person's full name, employer, job title, business address, and, if known, present contact information.
11. **"Identify,"** when referring to a document, means to state its title or description, date, author, recipient, the person from whom it was received, the approximate date it was reviewed, whether Defendant possessed a copy before or during the September 13, 2023 harassment trial, whether it was introduced into evidence, and its present custodian if known.
12. **"Identify,"** when referring to a communication, means to state the date, participants, method of communication, subject matter, and identify all documents reflecting or memorializing the communication.
13. **"Reviewed, received, relied upon, or considered"** means personally examining, reading, discussing, possessing, obtaining, being provided with, referencing, using,

relying upon, or otherwise taking into account a document, communication, or other information in connection with the subject matter of these Interrogatories.

INTERROGATORY NO. 1

Identify every document, exhibit, communication, report, affidavit, memorandum, email, transcript, note, or other material you reviewed, received, relied upon, or considered in preparation for the September 13, 2023 harassment trial, including the date reviewed, the person from whom it was received, whether you possessed a copy before or during trial, and whether it was introduced into evidence.

INTERROGATORY NO. 2

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

INTERROGATORY NO. 3

Identify every fact, document, communication, exhibit, transcript, note, memorandum, email, police report, affidavit, electronic record, or other information upon which you relied in deciding not to correct or clarify Jennifer Olland's testimony during the September 13, 2023 harassment trial that she had never received emails from Plaintiff Joseph Fabozzi.

INTERROGATORY NO. 4

Identify every exhibit that you offered or sought to introduce into evidence during the September 13, 2023 harassment trial and identify every exhibit you considered offering but did not introduce.

INTERROGATORY NO. 5

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

INTERROGATORY NO. 6

State whether you ever read, in whole or in part, the March 30, 2022 DCP&P letter identified as Exhibit 6 before the September 13, 2023 harassment trial. If your answer is yes, state when you first read the document and identify every person who provided it to you.

INTERROGATORY NO. 7

Identify every person who participated in, recommended, approved, or made the decision not to introduce Exhibit 6 into evidence during the September 13, 2023 harassment trial.

INTERROGATORY NO. 8

Identify every person, document, communication, email, memorandum, note, court filing, or other source from which you learned that Jennifer Olland had been found in default in **OCN-L-002231-22** and that a Proof Hearing had been scheduled for September 15, 2023.

INTERROGATORY NO. 9

Identify every communication, discussion, meeting, email, memorandum, telephone call, or other involvement you had after September 13, 2023 concerning Plaintiff Joseph Fabozzi's access to the audio recording, transcript, or other records of the September 13, 2023 harassment trial, including the identity of every person involved and the date of each communication.

INTERROGATORY NO. 10

If you contend that you did not become aware that Plaintiff Joseph Fabozzi informed the Mount Laurel Police Department that Jennifer Olland committed perjury during the September 13, 2023 harassment trial, identify every fact upon which you base that contention.

INTERROGATORY NO. 11

Identify every fact, policy, statute, court rule, directive, communication, or other authority upon which you base your denial that, in your capacity as Municipal Prosecutor, you had authority to participate in, recommend, or determine whether criminal perjury charges would be pursued against Jennifer Olland arising from her testimony during the September 13, 2023 harassment trial.

INTERROGATORY NO. 12

If you deny that you were involved in, approved, or ratified the decision not to pursue criminal perjury charges against Jennifer Olland arising from her testimony during the September 13, 2023 harassment trial, identify the person or persons who made, approved, or ratified that decision, if known.

INTERROGATORY NO. 13

If you deny that Jennifer Olland was not criminally charged with perjury in connection with her testimony during the September 13, 2023 harassment trial, identify every criminal complaint, accusation, summons, indictment, accusation number, docket number, court, charging agency, and disposition upon which you base your denial.

INTERROGATORY NO. 14

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

INTERROGATORY NO. 15

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

INTERROGATORY NO. 16

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

INTERROGATORY NO. 17

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

INTERROGATORY NO. 18

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

- Plaintiff Joseph Fabozzi's Motion for Alternate Service in OCN-L-002231-22;

- process server Dana Judge's reports and records of attempted service;
 - Plaintiff Joseph Fabozzi's November 3, 2022 emails identified as Exhibits 4 and 5;
 - the March 30, 2022 DCP&P determination that the child abuse allegations against Plaintiff were determined to be "Unfounded"; and
 - DCP&P Investigator Terrance Campbell's statement that the child stated she had never observed Plaintiff Joseph Fabozzi touch anyone and that her belief was based upon statements made by Jennifer Olland.
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INTERROGATORY NO. 19

State every reason why the March 30, 2022 DCP&P letter identified as Exhibit 6 was not introduced into evidence during the September 13, 2023 harassment trial, and identify every person and document upon which you rely in support of your answer.

INTERROGATORY NO. 20

State every reason why Plaintiff Joseph Fabozzi's November 3, 2022 emails identified as Exhibits 4 and 5 were not introduced into evidence during the September 13, 2023 harassment trial, and identify every person and document upon which you rely in support of your answer.

INTERROGATORY NO. 21

State every factual basis for your September 13, 2023 argument that Plaintiff did not post the March 30, 2022 DCP&P determination that the allegations against him were "Unfounded," and identify every document, exhibit, witness, and other information upon which you relied in making that argument.

INTERROGATORY NO. 22

Identify every communication you had, whether written, electronic, or oral, concerning Joseph Fabozzi after the conclusion of the September 13, 2023 harassment trial through the present. For each communication, state:

- a. the date;
 - b. every person participating in or receiving the communication;
 - c. the method of communication (email, text message, telephone call, meeting, letter, etc.);
 - d. the general subject matter discussed; and
 - e. whether any document, email, text message, memorandum, note, or recording memorializes the communication.
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INTERROGATORY NO. 23

Identify every action you took after September 13, 2023 concerning Plaintiff's efforts to obtain the harassment trial transcript, audio recording, or other records of the September 13, 2023 trial, including every communication you had with any attorney, court employee, Township employee, police officer, or other person regarding those efforts.

INTERROGATORY NO. 24

State whether you ever read, in whole or in part, Jennifer Olland's November 3, 2022 Affidavit of Probable Cause (Exhibit 2) and handwritten statement (Exhibit 1) before the September 13, 2023 harassment trial. If your answer is yes, state when you first read each document and identify every person who provided either document to you.

INTERROGATORY NO. 25

State whether you ever read, in whole or in part, Plaintiff Joseph Fabozzi's November 3, 2022 emails identified as Exhibits 4 and 5 before the September 13, 2023 harassment trial. If your answer is yes, state when you first read each email and identify every person who provided either email to you.

EXHIBIT LIST

Exhibit 1 – Jennifer Olland Written Statement

Exhibit 2 – Jennifer Olland Affidavit of Probable Cause

Exhibit 3 – September 13, 2023 Harassment Trial Transcript

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

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

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

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

Exhibit 8 – Dana Judge Chat Communications

Exhibit 9 – Dana Judge Service Attempt No. 1

Exhibit 10 – Dana Judge Service Attempt No. 2

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

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

Exhibit 12 – DCP&P Unfounded Determination Memorandum

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

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

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

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

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

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

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

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

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

Exhibit numbers 19 through 21 - were intentionally not used.

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

Exhibit 23 – Allison Gasiorowski Audio Request

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

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

INTERROGATORIES

Respectfully submitted,

Dated: July 8, 2026

Joseph Fabozzi

Plaintiff, Pro Se



[REDACTED]
[REDACTED]
[REDACTED]