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N.J.S.,

Plaintiff.

-v-

STATE OF NEW JERSEY JUVENILE  
JUSTICE COMMISSION; JUVENILE  
MEDIUM SECURE FACILITY; OFFICER  
FNU SPENCER, individually and as an  
employee of the Juvenile Medium Secure  
Facility; OFFICER FNU FOX individually and  
as an employee of the Juvenile Medium Secure  
Facility; OFFICER FNU DEJESUS,  
individually and as an employee of the  
Juvenile Medium Secure Facility; OFFICER  
FNU WICK, individually and as an employee  
of the Juvenile Medium Secure Facility;  
OFFICER FNU PAUL, individually and as an  
employee of the Juvenile Medium Secure  
Facility; OFFICER FNU CARTER,  
individually and as an employee of the  
Juvenile Medium Secure Facility; SERGEANT  
FNU KOLLOGI, individually and as an  
employee of the Juvenile Medium Secure  
Facility; CHRISTIAN NNAJIOFOR,  
individually and as Superintendent of the  
Juvenile Medium Secure Facility; and JOHN  
DOES 1-10, and JOHN DOE ENTITY 1-10,

Defendants.

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MERCER COUNTY

DOCKET NO.:

**COMPLAINT**

Plaintiff N.J.S., by and through undersigned counsel, based on personal knowledge and upon information and belief, alleges as follows:

**NATURE OF THE ACTION**

1. On August 4, 2022, Plaintiff – a nineteen-year-old boy – was brutally assaulted by three juvenile residents at the Juvenile Medium Secure Facility (“JMSF”) in a planned attack known to the officers at JMSF, who watched for several minutes before intervening. Plaintiff is now permanently blind due to the conduct of Defendants as alleged herein.
2. The New Jersey Juvenile Justice Commission (“JJC”), JMSF and Defendant Christian Nnajofofor (“Nnajofofor”), the Superintendent of JMSF, were aware of a longstanding culture of abuse amongst juvenile detainees at the JMSF.
3. Due to the conditions created by Defendants, and their intentional and negligent actions, Plaintiff was brutally assaulted by three juvenile residents and continues to suffer severe physical, psychological and emotional distress.
4. Plaintiff brings this action to obtain compensatory and punitive damages for violation of his rights under the New Jersey Constitution, New Jersey Civil Rights Act (N.J.S.A. § 10:6-2), and the common law.

**PARTIES<sup>1</sup>**

5. Plaintiff N.J.S. is an individual residing in Mercer County, New Jersey. He was detained at JMSF on August 4, 2022.
6. Defendant State of New Jersey Juvenile Justice Commission “is established in, but not of, the Department of Law and Public Safety” within the Office of the Attorney General, pursuant to

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<sup>1</sup> Plaintiff is unaware of the first names of Officers Spencer, Fox, De Jesus, Wick, Paul, Carter, and Sergeant Kollogi. Plaintiff intends to amend the Complaint upon receipt of further discovery.

N.J.S.A. 52:17B-170. The JJC's responsibilities include, but are not limited to: (1) assuming "the custody and care of all juveniles committed" to the agency by court order or other means; (2) establishing "minimum standards for the care, treatment, government and discipline of juveniles confined"; and (3) managing and operating "all State secure juvenile facilities." N.J.S.A. 52:17B-170(5); N.J.S.A. 52:17B-170(7); N.J.S.A. 52:17B-170(8)

7. Pursuant to N.J.S.A. 52:17B-170(8), Defendant Juvenile Medium Secure Facility falls under the authority of the JJC. Thus, JMSF also falls under the authority of the Office of the Attorney General, pursuant to N.J.S.A. 52:17B-170.
8. JMSF is one of the JJC's secure juvenile facilities, housing approximately 118 male juveniles.
9. Upon information and belief, Defendant Christian Nnajofofor is the Superintendent of JMSF, with a business address of P.O. Box 307, Burlington Street, Bordentown, NJ. He is sued individually and as the superintendent of JMSF.
10. Upon information and belief, Defendant Officers were at all relevant times employees of the JJC and/or JMSF, and at all relevant times had supervisory power over Plaintiff.
11. Officer FNU Spencer is sued in his individual capacity and as an employee of JMSF. Upon information and belief, Spencer is a resident of New Jersey.
12. Officer FNU Fox is sued in his individual capacity and as an employee of JMSF. Upon information and belief, Fox is a resident of New Jersey.
13. Officer FNU DeJesus is sued in his individual capacity and as an employee of JMSF. Upon information and belief, DeJesus is a resident of New Jersey.

14. Officer FNU Wick is sued in his individual capacity and as an employee of JMSF. Upon information and belief, Wick is a resident of New Jersey.
15. Officer FNU Paul is sued in his individual capacity and as an employee of JMSF. Upon information and belief, Paul is a resident of New Jersey.
16. Officer FNU Carter is sued in his individual capacity and as an employee of JMSF. Upon information and belief, Carter is a resident of New Jersey.
17. Sergeant FNU Kollogi is sued in her individual capacity and as an employee of JMSF. Upon information and belief, Kollogi is a resident of New Jersey.
18. Defendants John Doe 1-10 and John Doe Entities 1-10 are individuals and/or entities who caused and/or contributed to the violation of Plaintiff's rights. Plaintiff will amend the Complaint to allege the Doe defendants' true names when they have been discovered.

#### **JURISDICTION AND VENUE**

19. This is an action in a case of actual controversy and is brought pursuant to the *Rules Governing the Courts of the State of New Jersey*. Venue is proper in Mercer County pursuant to Rule 4:2-3 of the *Rules Governing the Courts of the State of New Jersey* inasmuch as several of the Defendants reside in, or maintain a place of business, in said County.

#### **STATEMENT OF FACTS**

##### **JJC, JMSF and the Culture of Mistreatment and Abuse Amongst Juvenile Males.**

20. The Defendants JJC and JMSF are charged by law with safeguarding the rights of a vulnerable population – youth who are detained in their facilities.
21. The New Jersey Attorney General has confirmed, “Protecting the youth in the care of the Juvenile Justice Commission (JJC) is a matter of the highest priority for our administration.

We have zero tolerance for abuse of any kind in JJC facilities or in JJC-sponsored programs.”<sup>2</sup>

22. Nonetheless, the JJC, JMSF, Officers Spencer, Fox, De Jesus, Wick, Paul, Carter, Sergeant Kollogi and Superintendent Nnajofofor were at all times aware of a culture of abuse and mistreatment amongst juvenile males at JMSF.
23. There exists substantial evidence of systemic maltreatment of incarcerated youth in New Jersey—which includes “unchecked” youth-on-youth violence.<sup>3</sup>
24. Defendants had personal knowledge that Officers repeatedly failed to protect youth from violence by other officers and detainees.
25. The pervasive culture of mistreatment and abuse continued at JMSF through the time that Plaintiff was assaulted by three juvenile residents in August 2022. It also continued after the assault.

**Plaintiff’s Abuse at JMSF.**

26. Plaintiff has been detained in the JJC since on or about June 25, 2019.
27. On August 4, 2022, Defendants became aware that Plaintiff would be assaulted by other detainees.
28. More specifically, Officer Carter was personally informed by one of the assailants that an attack on N.J.S. was imminent in the pod.

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<sup>2</sup> Mike Catalini, *N.J. governor renews vows to close detention center where 50 men say they were sexually abused as boys*, WHYY (Jan. 19, 2024), <https://whyy.org/articles/new-jersey-youth-detention-abuse-training-center-monroe/>.

<sup>3</sup> See *Maltreatment of Youth in U.S. Juvenile Corrections Facilities*, Annie E. Casey Foundation, <https://assets.aecf.org/m/resourcedoc/aecf-maltreatmentyouthuscorrections-2015.pdf>.

29. Officer Carter informed Officer Spencer and took no further action.
30. Due to the likely attack on N.J.S., classes were cancelled on August 4, 2022.
31. Officer Spencer, Officer Carter and others failed to take necessary action to protect Plaintiff.
32. Despite the prior knowledge amongst the JMSF Officers that an impending fight was to occur in the Pod 4 Recreation Area, Officer Spencer was the only Officer assigned to this area.
33. Plaintiff was maliciously attacked and assaulted by three juvenile residents in the presence of other officers and juveniles in the Pod 4 Recreation Area at JMSF.
34. As set forth in a criminal complaint filed against the assailant juvenile residents and confirmed by video evidence:

“Inmate [J.G.] was standing next to Inmate [J.W.], and Inmate [T.C.C.] was standing next to Resident [J.G.]. Resident [N.J.S., Plaintiff] was playing cards with another inmate. Inmate [J.G.] joined in the card game, and Inmate [T.C.C.] stood a few feet behind Inmate [N.J.S., Plaintiff]. At 12:47:51, Inmate [J.W.] walked to the back of the backside of the stairwell and did seven pull-ups. At 12:48:00, Inmate [J.W.] walked back to Inmate [N.J.S., Plaintiff], who was playing cards, and punched Inmate [N.J.S., Plaintiff] on the right side of his face /eye area, and with his left fist, punched him on the left side of his head. Inmate [J.G.] immediately began to punch Inmate [N.J.S., Plaintiff] on his facial area. Inmate [T.C.C.] joined in and began to assault Inmate [N.J.S., Plaintiff]. Inmates [J.W.] and [J.G.] jumped on the table. Inmate [J.W.] stomped Resident [N.J.S., Plaintiff]’s head at least four times before jumping off the table and then continued to punch Inmate [N.J.S., Plaintiff]. Inmate [J.G.] stomped his head at least four times. He stayed on the table, continuing to assault Inmate [N.J.S., Plaintiff] by punching him. Inmate [J.G.], while on the table, continued to punch Inmate [N.J.S., Plaintiff].”

35. The above-referenced assault occurred in the presence of several JJC Officers.

36. During the assault, Officer Spencer was present in the Pod 4 Recreation Area and stood by observing the assault. Officer Spencer was initially the only officer present, while the other officers were in the outside hallway.
37. Once Officer Spencer decided to intervene, he did so by calling the codes to signal to other officers that there was a fight.
38. Officer Spencer remained idle while waiting for officers to arrive.
39. Upon information and belief, Officers Fox, DeJesus, Wick, Paul, Carter, and Sergeant Kollogi eventually arrived and assisted Officer Spencer in breaking up the fight.
40. The JJC was aware of Plaintiff's medical history prior to the assault, which included a heart condition, high blood pressure, asthma, and his need for physical therapy as a result of a prior serious car accident.
41. Officers Spencer, Fox, DeJesus, Wick, Paul, Carter, and Sergeant Kollogi were all aware that this assault was going to occur, and did nothing to prepare for it, let alone prevent it. They also did not adequately report the incident to the New Jersey Attorney General.
42. In excruciating pain, and with his right eye bleeding, Plaintiff was taken to medical. While in medical, Plaintiff informed the medical staff that he was unable to see out of his right eye. It was at this point that Plaintiff was informed that his globe was ruptured. N.J.S.'s pupil had fallen out and onto his shirt.
43. Medical staff and JJC employees delayed bringing Plaintiff to the hospital.
44. Finally, about one hour after the incident had occurred, Plaintiff was transported to St. Francis Medical Center.
45. Doctors confirmed that Plaintiff had a ruptured globe in his right eye and needed surgery.

46. Plaintiff was transported to University Hospital, where he underwent surgery on August 7, 2022.
47. Plaintiff filed a Grievance Remedy form on or about October 28, 2022, related to his assault.
48. On or about November 1, 2022, Plaintiff filed a Notice of Claim for Damages against the State of New Jersey.
49. Plaintiff was a young, vulnerable, and incarcerated individual at the time of the assault.
50. After the assault, Plaintiff suffered—and continues to suffer—severe physical distress.
51. Plaintiff has permanent damage to his right eye and will thus be permanently disabled for the rest of his life.
52. Plaintiff is unable to see out of his right eye and suffers from daily pain when air and light come into contact with his eye.
53. In addition, after the assault, Plaintiff suffered—and continues to suffer—severe psychological and emotional distress.

### **CAUSES OF ACTION**

#### **COUNT 1**

#### **(Cruel and Unusual Punishment Claim Under New Jersey Constitution and the New Jersey Civil Rights Act Against Defendant Nnaji for in his individual capacity)**

54. Plaintiff repeats and realleges the allegations contained in paragraphs 1-53 of the Complaint as if each were set forth fully herein.
55. The New Jersey Civil Rights Act, N.J.S.A. § 10:6-2, creates a private state law cause of action for any person whose state constitutional rights have been violated.
56. Article I, Paragraph 12 of the New Jersey Constitution prohibits the use of “cruel and unusual punishments.”



57. On August 4, 2020, three JMSF juvenile residents assaulted Plaintiff, causing serious injury, as set forth herein, in a pre-planned assault.
58. Officers Spencer, Fox, DeJesus, Wick, Paul, Carter, and Sergeant Kollogi were all aware that this assault was going to occur and did nothing to prepare for it or prevent it from occurring.
59. The assault occurred without immediate intervention from Defendants.
60. By his policies, practices, acts and omissions, Nnajiofor foreseeably created an environment that posed a substantial risk of harm to Plaintiff by encouraging, permitting, and/or otherwise facilitating cruel and unusual punishment against Plaintiff.
61. The risk to Plaintiff was obvious and known to Nnajiofor.
62. The acts and omissions of Nnajiofor violated the New Jersey Constitution's prohibition on cruel and unusual punishments. N.J. Const. Art. 1, Par. 12.
63. As a proximate result of the foregoing, Plaintiff has suffered and continues to suffer severe physical, psychological and emotional distress.

## **COUNT 2**

### **(Cruel and Unusual Punishment Claim Under New Jersey Constitution and the New Jersey Civil Rights Act Against Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi)**

64. Plaintiff repeats and realleges the allegations contained in paragraphs 1-63 of the Complaint as if each were set forth fully herein.
65. At all relevant times, Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi were acting under color of state law.
66. On August 4, 2020, three JMSF juvenile residents assaulted Plaintiff, causing serious injury, as set forth herein, in a pre-planned assault.

67. Officers Spencer, Fox, DeJesus, Wick, Paul, Carter, and Sergeant Kollogi were all aware that this assault was going to occur and did nothing to prepare for it or prevent it from occurring.
68. The assault occurred without immediate intervention from Defendants.
69. The risk to Plaintiff was obvious and known to Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi.
70. The conduct of Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi was willful, wanton, and reckless.
71. The acts and omissions of Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi violated the New Jersey Constitution's prohibition on cruel and unusual punishments. N.J. Const. Art. 1, Par. 12.
72. The acts and omissions of Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi caused Plaintiff substantial injury.
73. As a result of the assault, Plaintiff suffered and continues to suffer severe physical, psychological and emotional distress.

### **COUNT 3**

#### **(Negligent Hiring/Retention/Training Against Defendants JJC, JMSF and Nnajofofor)**

74. Plaintiff repeats and realleges the allegations contained in paragraphs 1-73 of the Complaint as if each were set forth fully herein.
75. There existed a longstanding history of failing to train corrections officers at JMSF which resulted in the consistent mistreatment of juveniles.
76. At all relevant times herein, the Defendants had a duty of reasonable care in the hiring, retention, and training of its corrections officers, including Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi, to ensure that their subordinates did not harm

detainees, including Plaintiff, as well as in their promulgation and enforcement of policies designed to ensure the safety of juvenile detainees.

77. The Defendants breached their duty of care and were negligent in their failure to properly hire, retain, and train corrections officers, including Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi.
78. The JJC, JMSF and Nnajiofor knew or had reason to know that Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi would engage in injurious conduct toward Plaintiff.
79. The JJC, JMSF and Nnajiofor knew or had reason to know that Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi were unfit and that it was dangerous for them to supervise juvenile detainees.
80. The JJC, JMSF and Nnajiofor do not adequately screen their prospective corrections officers.
81. The JJC, JMSF and Nnajiofor do not adequately train their corrections officers to prevent cruel and unusual punishment against those detained at the JMSF. Specifically, the JJC, JMSF, and Nnajiofor have not implemented adequate training programs about cruel and unusual punishment generally.
82. The JJC, JMSF and Nnajiofor do not adequately discipline their corrections officers to prevent the use of cruel and unusual punishment against those detained at JMSF.
83. The Defendants could have reasonably foreseen that the culture of mistreatment and abuse amongst juveniles created a risk of harm to detainees under Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi's supervision.
84. Plaintiff's injuries were proximately caused by Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi's unfitness and dangerous characteristics.

85. As a proximate result of the foregoing, Plaintiff has suffered and continues to suffer severe physical, psychological and emotional distress.

**COUNT 5**  
**(Negligent Supervision Against Defendants)**

86. Plaintiff repeats and realleges the allegations contained in paragraphs 1-85 of the Complaint as if each were set forth fully herein.

87. At all relevant times herein, the Defendants were under a duty to act reasonably in the performance of their duties; in the control, maintenance, operation, handling, and management of the jail and correctional facilities; in properly supervising Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi; in following and promulgating appropriate policies and procedures with respect to intervening when necessary to avoid and prevent harm to detainees from occurring.

88. The Defendants were under a duty to take proper action to avoid abuse and cruel and unusual punishment.

89. In particular, the Defendants had a duty of reasonable care in the supervision of its corrections officers, including Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi, to ensure that their subordinates protected detainees, including Plaintiff, as well as in their promulgation and enforcement of policies designed to ensure the safety of juvenile detainees.

90. The Defendants failed to exercise reasonable care to control the actions of Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi, in the event they were acting outside the scope of their employment, so as to prevent them from intentionally harming Plaintiff.

91. The acts perpetrated by Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Sergeant were conducted on the premises of JMSF.
92. The acts perpetrated by Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi were conducted while they were in uniform.
93. The acts perpetrated by Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi occurred while Plaintiff was within the facility.
94. The acts perpetrated by Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi occurred while Plaintiff was under the custody and care of JMSF.
95. The Defendants knew, or should have known, of their ability to control Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi and the necessity and ability to exercise such control.
96. By hiring Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi to work at JMSF, Defendants accepted the duty to supervise them at all times and preclude them from harming the detainees.
97. Defendants failed to do so.
98. As a proximate result of the foregoing, Plaintiff has suffered and continues to suffer severe physical, psychological and emotional distress.

**COUNT 6**  
**(Respondeat Superior Against Defendants)**

99. Plaintiff repeats and realleges the allegations contained in paragraphs 1-98 of the Complaint as if each were set forth fully herein.
100. The Defendants were negligent by virtue of the doctrines of vicarious liability and respondeat superior.

101. The wrongs of Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi were committed within the scope of their employment with JJC and/or JMSF.
102. Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi were reckless and/or failed to act with reasonable care.
103. Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi had a non-delegable duty to provide Plaintiff with a reasonably safe environment while housed at JMSF.
104. As a proximate result of the foregoing, Plaintiff has suffered and continues to suffer severe physical, psychological and emotional distress.

**COUNT 7**  
**(Intentional Infliction of Emotional Distress Against Defendants)**

105. Plaintiff repeats and realleges the allegations contained in paragraphs 1-104 of the Complaint as if each were set forth fully herein.
106. On August 4, 2020, three JMSF juvenile residents assaulted Plaintiff, causing serious injury, as set forth herein, in a pre-planned assault.
107. Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi's actions—in being aware of the impending assault; failing to do anything to protect Plaintiff from the assault; and failing to intervene after several minutes—were so outrageous in character and so extreme in degree as to go beyond all possible bounds of decency and to be regarded as atrocious and utterly intolerable in a civilized society.
108. As a proximate result of this conduct, Plaintiff suffered physical harm and continues to suffer severe psychological and emotional distress.

**COUNT 8**  
**(Deliberate Indifference to a Substantial Risk of Harm Against Defendants)**

109. Plaintiff repeats and realleges the allegations contained in paragraphs 1-108 of the Complaint as if each were set forth fully herein.
110. On August 4, 2020, three JMSF juvenile residents assaulted Plaintiff, causing serious injury, as set forth herein, in a pre-planned assault.
111. Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi were all aware of the impending assault, as one of the assailants informed Officer Carter, who relayed the information to the other Officers.
112. Defendant Spencer had notified Plaintiff that a fight was to occur that day. However, he neglected to inform Plaintiff that he was the intended target of the assault. No further action occurred.
113. Despite actual knowledge of the substantial risk of harm to Plaintiff known to Defendants, Defendants Spencer, Fox, DeJesus, Wick, Paul, Carter, and Kollogi recklessly disregarded that risk by intentionally failing to take reasonable measures to deal with the risk.
114. As a proximate result of this conduct, Plaintiff suffered physical harm and continues to suffer severe physical, psychological and emotional distress.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff seeks the following relief:

- A. An order entering judgment for Plaintiff against Defendants on each of his claims for relief;
- B. An award to Plaintiff for compensatory damages against all Defendants, jointly and severally, for their violation of his rights under the United

States and New Jersey Constitutions, the New Jersey Civil Rights statute, and common law,

- C. An award to Plaintiff of punitive damages against Defendants based on their conscious, criminal wrongdoing and callous indifference to the constitutional rights and welfare of Plaintiff, in an amount to be determined at trial;
- D. An award to Plaintiff of the costs of this action, including reasonable attorneys' fees; and
- E. Such further relief as this Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury on all issues.

**RESERVATION OF RIGHTS**

Plaintiff reserves the right to file such specific amendments and/or additional claims as are applicable hereinafter to this action and/or as the same are subsequently discovered.

**DEMAND FOR PRODUCTION OF INSURANCE AGREEMENTS**

Pursuant to Rule 4:10-2(b), demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy all or part of a judgment, which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgment. If so, attached a copy of each, or in the alternative state, under oath and certification, the (a) policy number; (b) name and address of the insurer; (c) inception and expiration date; (d) names and addresses of all persons insured thereunder; (e) personal injury limits; (f) property damage limits; and (g) medical



payment limits.

**CERTIFICATION IN ACCORDANCE WITH RULE 4:5-1**

I certify that the matter in controversy is not the subject of any other court action or arbitration proceeding and no such action or proceeding is contemplated. I know of no other party who should be joined in this action.

Respectfully submitted,

/s/ Ernesto Cerimele  
Ernesto Cerimele, Esq.  
**Klingeman Cerimele, Attorneys**  
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Dated: July 2, 2024



# Civil Case Information Statement

## Case Details: MERCER | Civil Part Docket# L-001308-24

**Case Caption:** S N VS JUVENILE JUSTICE COM MISSION

**Case Initiation Date:** 07/02/2024

**Attorney Name:** ERNESTO CERIMELE

**Firm Name:** KLINGEMAN CERIMELE, ATTORNEYS

**Address:** 100 SOUTHGATE PKWY STE 150

MORRISTOWN NJ 07960

**Phone:** 9737928822

**Name of Party:** PLAINTIFF : S, N, J

**Name of Defendant's Primary Insurance Company**

(if known): Unknown

**Case Type:** CIVIL RIGHTS

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 6 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Does this case involve claims related to COVID-19?** NO

**Are sexual abuse claims alleged by:** N J S? NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** YES

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO Consumer Fraud? NO Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

07/02/2024

Dated

/s/ ERNESTO CERIMELE

Signed

