

400 MAIN STREET
CHATHAM NEW JERSEY 07928

GINA MENDOLA LONGARZO, ESQ.
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FRANCESCA N. MENDOLA, ESQ.

LAW OFFICES OF
GINA MENDOLA LONGARZO, LLC
ADMITTED IN NEW JERSEY

NOTICE OF CLAIM FOR DAMAGES

TO:

1. Chatham Township
58 Meyersville Road
Chatham, NJ 07928
2. Chatham Township Police Department
401 Southern Boulevard
Chatham, NJ 07928
3. John & Jane Does
(Unknown Chatham Township Employees)
c/o Chatham Township
58 Meyersville Road
Chatham, NJ 07928

I. Name and post office address of claimants:

Michael Giannone
20 Milton Avenue
Summit, NJ 07901.

II. Post office address to which the person presenting claim desires notice to be sent:

Gina Mendola Longarzo, Esq.
Law Offices of Gina Mendola Longarzo, LLC
400 Main Street
Chatham, New Jersey 07928

III. Date, place and other circumstances of the occurrence or transaction which gave rise to the claim asserted:

Claimant, Officer Michael Giannone is an employee of the Chatham Township Police Department [the "Department"] in the Township of Chatham [the "Township"]. Ptl. Giannone has been employed by the Department for 15 1/2 years. In January 1997, Ptl. Giannone worked as a dispatcher for his first seven months with the Department, after which he became a Patrolman in August 1997, and has been a Patrolman ever since. Ptl. Giannone was also the Policemen's Benevolent Association ["PBA"] President until mid-June 2012.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Finally, since the summer of 2011, Ptl. Giannone has also endured retaliation because he is the PBA President.

[REDACTED]

[REDACTED]

[REDACTED] Overall, the Department and the Township ignored Ptl. Giannone's complaints and failed to take any action to remedy the situation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Moreover, as result of Ptl. Giannone's complaint, the Township and the Department have refused to acknowledge and process two Open Public Records Act ["OPRA"] requests that Ptl. Giannone submitted nearly two months ago. [REDACTED]

[REDACTED]

IV. General Description of the injury, damage or loss incurred so far as it may be known at the time of presentation of this claim:

The course of conduct of the Department, the Township, and all the individuals named above has caused Claimant to suffer damages. Furthermore, the aforesaid unlawful conduct has resulted in intentional retaliation and harassment; civil rights violations; intentional infliction of emotional distress; discrimination; intentional interference with economic advantage; invasion of privacy violations; intentional interference with contractual relations resulting in deprivation (and/or impossibility) of continued employment; invasion of privacy; severe emotional distress; loss of reputation; defamation; loss of income; bailment; constitutional rights violations; 42 USC §1983 violations; violations of the New Jersey Conscientious Employee Protection Act; violations of the New Jersey Civil Rights Act; Violation of the New Jersey Law Against Discrimination (NJLAD); breach of contract; gross and intentional negligence, promissory estoppel; undue coercion; breach of fiduciary duty; and conspiracy.

V. The name or names of other public entity, employee, or employees causing the injury, damage or loss, if known:

1. State of New Jersey, Dept. of Labor
John Fitch Plaza
P.O. Box 110
Trenton, NJ 08625
2. State of New Jersey, Dept. of Labor
Labor Standards & Safety Enforcement (formerly Workplace Standards)
225 E. State Street
P.O. Box 054
Trenton, NJ 08625
Chatham, NJ 07928

VI. The amount claimed as of the date of presentation of the claim, including the estimated amount of any prospective injury, damage or loss, insofar as it may be known at the time of the presentation of the claim, together with the basis of the computation of the amount claimed:

The amount claimed is \$2,500,000.00 dollars. However, the extent of the injuries is ongoing and will continue to be revealed and ascertained through continuing discovery. Upon the completion of discovery, a proper presentation of the claim can be further ascertained.

If there are any supplemental forms to answer, please provide a copy of said forms to my office immediately.

LAW OFFICES OF GINA MENDOLA
LONGARZO, LLC

By: 

GINA MENDOLA LONGARZO, ESQ.
Attorneys for Claimant
Michael Giannone

Dated: August 6, 2012