

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT  
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Morgan Nellic et al  
(Enter above the full name of the plaintiff in this action)

COMPLAINT

v.

Camden County  
Karen Taylor  
Camden County Board of Freeholders  
(Enter the full name of the defendant or defendants in this action)

Civil Action No.                       
(To be supplied by the Clerk of the Court)

RECEIVED

MAY 18 2023

AT 8:30                      M  
CLERK, U.S. DISTRICT COURT - DNJ

INSTRUCTIONS; READ CAREFULLY

1. This complaint must be legibly handwritten or typewritten, signed by the plaintiff and subscribed to under penalty of perjury as being true and correct. All questions must be answered concisely in the proper space on the form. Where more space is needed to answer any question, attach a separate sheet.
2. In accordance with Rule 8 of the Federal Rules of Civil Procedure, the complaint should contain (1) a short and plain statement of the grounds upon which the court's jurisdiction depends, (2) a short plain statement of the claim showing that you are entitled to relief, and (3) a demand for judgment for the relief which you seek.
3. You must provide the full name of each defendant or defendants and where they can be found.
4. You must send the original and one copy of the complaint to the Clerk of the District Court. You must also send one additional copy of the complaint for each defendant to the Clerk. Do not send the complaint directly to the defendants.
5. Upon receipt of a fee of \$400.00 (a filing fee of \$350.00, and an administrative fee of \$50.00), your complaint will be filed. You will be responsible for service of a separate summons and copy of the complaint on each defendant. See Rule 4, Federal Rule of Civil Procedure.

6. If you cannot prepay the \$402.00 fee, you may request permission to proceed in forma pauperis in accordance with the procedures set forth in the application to proceed in forma pauperis. See 28 U.S.C. §1915. (If there is more than one plaintiff, each plaintiff must separately request permission to proceed in forma pauperis.)

7. If you are given permission to proceed in forma pauperis, the \$52.00 Administrative Fee will not be assessed. The Clerk will prepare and issue a copy of the summons for each defendant. The copies of summonses and the copies of the complaint which you have submitted will be forwarded by the Clerk to the United States Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can locate and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

QUESTIONS TO BE ANSWERED

1a. Jurisdiction is asserted pursuant to (CHECK ONE)

42 U.S.C. §1983 (applies to state prisoners)

Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics, 403 U.S. 388 (1971) and 28 U.S.C. § 1331 (applies to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

Court has supplemental jurisdiction over plaintiffs state law claims under 28 U.S.C. Section 1367

1b. Indicate whether you are a prisoner or other confined person as follows:

Pretrial detainee

Civilly-committed detainee

Immigration detainee

Convicted and sentenced state prisoner

Convicted and sentenced federal prisoner

Other: (please explain) \_\_\_\_\_

2. Previously Dismissed Federal Civil Actions or Appeals

If you are proceeding in forma pauperis, list each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility, that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted. Please note that a prisoner who has on three or more prior occasions, while detained in any facility, brought an action or appeal in a federal court that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted, will be denied in forma pauperis status unless that prisoner is under imminent danger of serious physical injury. See 28 U.S.C. § 1915(g).

a. Parties to previous lawsuit:

Plaintiff(s): Morgan Neilio

Defendant(s): Yashar Ebady; Danielle Neilio

b. Court and docket number: Case # 1:23-cv-02091-RBK-AMD

c. Grounds for dismissal: ( ) frivolous ( ) malicious  
(X) failure to state a claim upon which relief may be granted

d. Approximate date of filing lawsuit: March 2022

e. Approximate date of disposition: 1-4-23

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on separate sheets.

3. Place of Present Confinement? Camden County Correctional Facility

4. Parties

(In item (a) below, place your name in the first blank and place your present address in the second blank. Do the same for additional Plaintiffs, if any.)

a. Name of plaintiff: Morgan Neilio

Address: 330 Federal st. Camden, NJ 08103

Inmate #: 4367816

b. First defendant:

Name: Camden County

Official position: Jurisdiction over Camden County's Institutions

Place of employment: Camden County

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

Failed duty of care resulting in First, Fifth, Sixth, Eighth, and Fourteenth Amendments violations

c. Second defendant:

Name: Karen Taylor

Official position: Warden at the Camden County Jail

Place of employment: Camden County Correctional Facility

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

Karen Taylor is the Superintendent/Warden at the Camden County Corr. Facility. She is legally responsible for the operation at the jail and the welfare of all the inmates at the jail. Her failed duty of care resulted in inmates First, Fifth, Sixth, Eighth, and Fourteenth Amendments being violated. She also failed to abide by state statutes regarding jail operations.

d. If there are more than two defendants, attach a separate sheet.

For each defendant specify: (1) name, (2) official position, (3) place of employment, and (4) involvement of the defendant.

\* Each defendant is sued individually and in his/her official capacity. At all times mentioned in this complaint each defendant acted under color of state law. ①

#### 4 (d.) - Additional Defendants

d. Camden County Board of Freeholders - are legally responsible for the overall operation of the institution under its jurisdiction. Failed duty of care resulted in violations of state statutes regarding jails operations and violated inmates First, Fifth, Sixth, Eighth, and Fourteenth Amendments.

e. Deputy Warden Rebecca Franceschini - Superintendant / Deputy Warden responsible for the Camden Co. Jail's operation and the welfare of inmates therein. Failed duty of care resulted in violations of state statutes regarding jail operations and led to inmates' First, Fifth, Sixth, Eighth, and Fourteenth Amendments being violated.

f. Camden County Sheriffs Department - are legally responsible for the overall operation of the Camden County Jail. Failed duty of care resulted in violations of state statutes regarding jail operations, and violated inmates constitutional rights; First, Fifth, Sixth, Eighth, and Fourteenth Amendments.

g. Captain Robert Leithead - Is a correctional officer of the N.J. Dept. of Corrections, who at all times mentioned in this complaint, held the rank of Captain and was assigned to Camden County Correctional Facility. Captain Leithead was deliberately indifferent to medical needs, unsafe conditions, gender discrimination, Equal Protection violations, access to the courts, right to contact visits with family, and cruel and unusual punishment in violation of the inmates First, fifth, sixth, eighth, and Fourteenth Amendments.

## Additional Defendants

h. Captain Blackwell (retired in the past year) - was a correctional officer of the NJ Dept. of Corrections, who was positioned in the rank of Captain at the Camden County Corr. Facility. Captain Blackwell was deliberately indifferent to inmates access to the courts, access to attorneys for private communications, and the jails mishandling of inmates legal mail in violation of the First, Sixth, and Fourteenth Amendments.

i. Commissioner of the New Jersey Dept of Corrections - is legally responsible for the overall operations of jail institutions in New Jersey. Failed duty of care resulted in violations of state statutes regarding jail operations and resulted in inmates constitutional rights being violated.

j. Carole Parker - is a social worker hired and positioned to work with inmates at the Camden County Correctional Facility. In her role as social worker, Ms. Parker provided false reports which resulted in loss of familial relationships in violation of the First, Eighth, and Fourteenth Amendments, as well as the Fifth Amendment to be free from self-incrimination.

k. Sgt. Lisa Rojas - is a correctional officer of the NJ Dept. of Corrections, with the rank of Sgt. positioned at the Camden County Corr. Facility. She failed to protect, in her supervisory role, resulting in an assault, and violations of inmates First, Eighth, and Fourteenth Amendments.

l. Russell Hart - is the law librarian hired and positioned to work with inmates at the Camden Co. Corr. Facility. Mr. Hart was deliberately indifferent to access to the law library, access to the courts, mishandled legal mail, and gender discrimination, In violation of the First, Sixth, and Fourteenth Amendments.

5. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in the Statement of Claims on page 6.

Yes  No

If your answer is "Yes", briefly describe the steps taken, including how relief was sought, from whom you sought relief, and the results.

Relief was sought through the jail's grievance procedures, however the jail left grievances unanswered.

If your answer is "No", briefly explain why administrative remedies were not exhausted.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. Statement of Claims

(State here as briefly as possible the facts of your case. Describe how each defendant violated your rights, giving dates and places. If you do not specify how each defendant violated your rights and the date(s) and place of the violations, your complaint may be dismissed. Include also the names of other persons who are involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach a separate sheet, if necessary.)

Refer to pages 1 through 36 of accompanied document w/ attached exhibits.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Relief

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

We are / I am seeking injunctive, declaratory, and equitable relief for pain, suffering, and emotional distress over an extended period (of over 3 years; personally).  
For inmates similarly situated now or in the future.



Plaintiffs

Janelle Chadis 4385527	Jillian Moskowitz #4383484
Marlena Cook 43873449	
Victoria Long 4384757	Sarah Giaccio 4384187
Nancy Acosta 4383594	KYLEE LEONARD #4386437
June Rothmiller 4385936	
Sara Hard #4386196	
Tamika Wiggins 4360317	
Jammy Ruggiano 4384797	
Chanel Adams 4380949	

8. Do you request a jury or non-jury trial? (Check only one)

Jury Trial ( ) Non-Jury Trial

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 5 day of May, 2023

Morgan Neibi  
Signature of plaintiff\* et al..

(\*EACH PLAINTIFF NAMED IN THE COMPLAINT MUST SIGN THE COMPLAINT HERE. ADD ADDITIONAL LINES IF THERE IS MORE THAN ONE PLAINTIFF. REMEMBER, EACH PLAINTIFF MUST SIGN THE COMPLAINT).

Inmate name, signature, #

Kristy Lee, Kwoty Lee 438454

Zuinda Rosado 4377445

Leeann Acevedo 4384238

Cheryl Hughes 4386390

Jasmin Wells 4386383

Jaffany Rolon 4386047

Michelle Williams 4382744

Keona Barnes #4385512

Brandy Lee #4384993

Yasmin A Burgos #4385445

Jessica Roque 4386254-4386254

Maribel W 4378392

Shaquana Lewis #4384127

Tyanna Flores #4382491

Wanda Dugan 4370077

Shakyah Smith -