

Thomas Caggiano, Pro Se  
7086 Arcadia Glen Court  
North Las Vegas, Nv 89084  
Tel: (702) 586-6768  
Jul 6, 2011  
Published on <http://thomascaggiano.com/110706wantage.pdf>

---

State of New Jersey Stillwater/Wantage and Borough of Sussex Plaintiff		<b>Municipal COURT OF Stillwater</b> Wantage, Borough of Sussex formerly Stillwater/Hampton municipal court
		<b>SUSSEX COUNTY</b>
		<b>Docket No. S-2003-000083/84</b>
Vs.		<b>Petty Disorder Conviction ACTION</b>
Thomas Caggiano Defendant		<b>NOTICE OF MOTIONS FOR RELIEF FROM COURT ORDER Change of Venue</b>
		<b>Summary Judgement Vacate Court Order</b>

---

NOTICE OF MOTIONS:

Municipal Court of Wantage, Stillwater, and Borough of Sussex County (formerly Stillwater/Hampton) before Judge Mulhern, J.M.C. and as municipal prosecutor Laddey, Clark and Ryan LLC. now before Judge Craig U. Dana, J.M.C. and Dolan and Dolan PA municipal prosecutor William T. Haggety, Esq.

1. Please accept this letter in lieu of a more formal brief.
2. This is a **VERIFIED CERTIFIED AFFIDAVIT** based upon my personal knowledge and therefore per N.J. Court Rules usable as evidence in court.
3. **Please take notice:** That annexed hereto is Defendant's Proposed court order to vacate the unconstitutional court orders issued by the Hon. Mulhern, J.M.C. that violate the Constitution of the United States of America, the Constitution of New Jersey, the Open Public Meetings Act (OPMA), the new Open Public Records Act OPRA) and the right to notify in a public meeting at a designated location the right to present

grievances, attend public meetings at designated locations being the Sussex County Soil Conservation District which is per new evidence presented in the 36 page report attached documents by the Stillwater municipal court, a criminal conspiracy of fraud, trickery, confederation, conspiracy to obstruct the administration of law, allow illegal certificates of occupancy to be issued for two homes in the minor sub-division that has restricted deeds provided the Sussex County Administrator at the direction after review with the Sussex County Clerk and the Sussex County Counsel. Furthermore, after eight years of lies, and statements by the District and its lawyers, an admission was made by the Sussex County Soil Conservation District's attorney AFTER he denied the existence of a second false Soil Erosion and Sediment Control Plan by the corrupt District Chairman Clifford Lundin, Esq. and as stated in evidence introduced to the Sussex County Board of Chosen Freeholders on Nov 5, 2008 as the false drawings submitted by E.N.F. Development Co. LLC were provided the Laddey, Clark and Ryan LLC. municipal prosecutor, and whereas his law associate Richard A. Stein, Esq. who is under investigation by the Office of Attorney Ethics as well as Judge Craig U. Dana, J.M.C. conspirator William E. HInkes, Esq. is also under investigation by the Office of Attorney Ethics for NOT reporting the illegal conduct and violation of court rules by Judge Craig U. Dana, J.M.C. that were already determined in my municipal appeals before the corrupt Superior Court N. Peter Conforti, J.S.C. on Municipal Appeals 13-09-09 and 19-05-09 State of New Jersey vs. Thomas Caggiano and made determinations that Judge Craig U. Dana, J.M.C. constantly violated court rules in his sentencing and resentencing on Sep 10, 2009 and on Sep 30, 2010 also made a finding that Judge Craig U. Dana, J.M.C. had NO authority to keep me jailed based upon his illegal court order that a voluntary mental examine was required to be released from Sussex County Jail and whereas the Sussex County Administrator CEO has twice requested the Sussex County Prosecutor David Weaver, Esq. the former law partner of William Hinkes, Esq. and whereas in violation of court rules no probable cause hearing was conduct by Judge Craig U. Dana, J.M.C. nor any municipal judge per N.J. Court Rules which Judge Conforti, JSC then demanded in his own court orders that a probable cause hearing per rules governing municipal courts must be held by a municipal judge, and whereas Judge Craig U. Dana's court orders are also unconstitutional, violate the Bill of Rights, OPMA and other laws and even the Vicinage Assignment Judge's court orders that the Borough of Stanhope MUST respond to written OPRA requests denied in violation of OPRA by Judge Dana, J.M.C. and whereas I can was not provided audio recordings of Judge Dana's corrupt kangaroo court wherein perjury was done by the State's witness Richard A. Stein, Esq. and whereas both Judge Mulhern, J.M.C. and Judge Dana, J.M.C. did NOT allow Mar Pawar to testify in my defense both violated the Constitutions of New Jersey as Mary Pawar and Iqbal Pawar were both threatened by lawyers for John Cilo Jr. a professional engineer who was bribed by the Borough of Stanhope as he submitted perjury Annual Financial Reports as did the Borough of Stanhope's Mayor, Governing Body members as known to Richard Stein, Esq. that John Cilo Jr. Associates did NOT have a valid contract to be a Borough Engineer, that his employee Scarlett Doyle did NOT have a valid contract to be the Town Planner and neither did Eric Keller, PE as municipal engineer as Vice President of Omland Engineering Associates. Whereas the prosecutor's filed of Laddey, Clark and Ryan LLC copy was provided by Ms Fisher upon my request for copies and proves that the District and Winifred Straub who filed the harassment charge herself willfully decieved the Official investigation by the Department of Community Affairs' Codes and Standards investigator John Maher and that John Cilo Jr. also provided false information to the Codes and Standards investigation

as both the State of New Jersey and the Borough of Stanhope and Developer who submitted false plans to the State that the State certified as only 1/2 project plans and whereas as noted in Ms. Skidmore's own report to the State Police I did appear at the District as they are the State's agency charged with enforcement of the State's Soil Conservation and Soil Erosion and Sediment Control Act but as noted in the now published transcripts on <http://thomascaggiano.com/transcripts> the State's professional engineers admits he never even looked at the total project, that the false drawings known to the municipal prosecutor proving the corruption of Winifred Straub now a member of the Sussex County Soil Conservation District's Board of Supervisors as the admissions by Dolan and Dolan PA newly assigned attorney who happens to also be the courts municipal prosecutor Mr. Haggerty himself is aware of the falsehoods provided by the State lawyers and municipal lawyers and should have per Rules of Professional Conduct reported them to the OAE. I request a change in venue as it is obvious that Judge Dana, J.M.C. has a conflict of interest and that the municipal prosecutor that has provided me evidence of the corruption of the State's witnesses in his role as OPRA custodian is fully aware of the violation of the Stillwater/Hampton prosecutor in violation of Brady Protocols and in cooperating and influencing the municipal court Judge Mulhern, J.M.C. to issue court orders in violation of the U.S. Constitution, N.J. Constitution, Open Public Meeting Act (OPMA), Open Public Records (OPMA) as done by Judge Craig U. Dana, J.M.C. I therefore make this motion for change of Venue and to vacate the unconstitutional court orders issued by Judge Mulhern, J.M.C. The OAE investigator is Harry Norton Jr. Esq. and I adopt all records and the replies by William Hinkes, Esq. and Richard Stein, Esq. to the Supreme Court investigator as relevant materials and all documents provided by me to the investigator, the OAE Director, ACJC and DRB as adopted relevant exhibits.

The Docket number for the investigations are and all documentation is referenced herein this Verified Certified Affidavit and NOTICE of Motion to support the proposed court orders attached:

- a. Docket No. XIV-2010-2006E Thomas Caggiano vs. Richard A. Stein, Esq.
- b. Docket No. XIV-2010-2011E Thomas Caggiano vs. William E. Hinkes, Esq.

**4. Please take FURTHER notice:** Pursuant to Rule 1:6-2 (d) the undersigned requests Oral Argument in the event there is any opposition to the motion for Summary Motion to vacate all the municipal court's orders issued by Judge Mulhern, J.M.C. against Thomas Caggiano in State of New Jersey V. Thomas Caggiano on malicious charges brought by Winifred Straub a prior manager of the corrupt Sussex County Soil Conservation District that even approved on MAR 24, 2004 a second 1/2 Project Soil Erosion and Sediment Control Plan by Clifford Lundin, Esq. as the lawyer of Dolan and Dolan PA denied its existence but the second false 1/2 Project Soil Erosion and Sediment Control Plan was certified AFTER the State executive secretary for the State Soil Conservation Commission James Sadley informed the District any certified Soil Erosion and Sediment Control Plan MUST BE for the Project. This second false plan certified by Clifford Lundin, Esq. was presented by John Cilo Jr., of John Cilo Jr. Associates who was bribed by the Borough of Stanhope for apparently over a decade as reported by the excellent former Municipal Clerk Ms. Robin Kline, RMC, MAS during an eight month interim order by the corrupt Government Record Council as Ms. Kline, RMC, MAS reported the criminal conduct to many State agencies herself. The initial false certified Soil Erosion and Sediment Control Plan was signed by Clif-

ford Lundin, Esq. on Oct 8, 2002 which was months AFTER the house on 6 Oak Drive was sold by E.N.F. Development Co. LLC by fraud to the owners on Jul 12, 2002 as restricted deed covenants were violated that was embedded in prior deeds by signature of the Board of Adjustments Chairman and Secretary. The copy of the fraudulent deeds submitted by E.N.F. Development LLC to the Sussex County Clerk's office were obtained by the Sussex County Clerk's staff and per the direction of the Sussex County Council Dennis Mc Connell, Esq. provided to the Sussex County Administrator John Eskilson who in turn they provided them to the Sussex County Council as noted by the Sussex County Board of Chosen Freeholders Board Clerk Elaine Morgan and also the Sussex County Administrator's assistant as they were then provided by the Sussex County Administrator John Eskilson to the Sussex County Counsel and are published and adopted as referenced exhibits with my annotated notes thereon on

<http://thomascaggiano.com/deeds.pdf>

In addition my testimony before the Office of Attorney General's Department of Consumer Affairs' Board of Engineers is adopted as an exhibit as the STATE of NEW JERSEY was fully aware of the fraudulent conduct by the developer, and false inspection reports by the Borough of Stanhope and the State's Department of Agriculture as the exhibits were included with the State's own court record under my complaint Thomas Caggiano vs. John Cilo Jr. under Complaint 05-13 and additional evidence was provided and is adopted by reference of the complaints filed by Mary Pawar and Iqbal Pawar under Complaints 05-13.a and 05-13.b. as based upon the records of the Office of Attorney General of the State of New Jersey the perjury by Richard A. Stein, Esq. in the Joint Municipal Court of Green, Hampton, Fredon, and Borough of Andover is beyond any reasonable doubt. Whereas this evidence was also available to the municipal prosecutor and NOT presented violations of Rules of Professional Conduct and foul blows continue.

I adopt my testimony as valid and under oath with the adopted exhibits included in the STATE of New Jersey's Office of Attorney General's own records which I obtained via an electronically submitted Open Public Record Act Request as such requests are illegally denied by Judge Craig U. Dana, J.M.C. who with Judge Bozonelis, A.J.S.C. denied me access to examine any court records even those under the 13 criminal charges filed by corrupt Borough of Stanhope officials and employees with the corrupt Sussex County Prosecutor David Weaver, Esq. which were ALL Dismissed with Prejudice against the STATE of New Jersey on May 11, 2010. The false deeds that were submitted by E.N.F. Development LLC on 2 and 6 Oak Drive with my annotated comments provided the Sussex County Administrator are published on the internet

<http://thomascaggiano.com/transcripts/060202transcriptBOE.CaggianoVCilo.pdf>

**5. Please take FURTHER notice:** The Borough of Stanhope Borough Attorney falsely told the Superior Court Assignment Judge Bozonelis, A.J.S.C. under a case filed originally against Thomas Caggiano and the GRC as a stay request and stated falsely to the Assignment Judge under Docket SSX-L-847-07 that I submitted eight hundred (800) Open Public Record Act requests in two years to the Borough of Stanhope **ALL on zoning** as noted in the transcript records available under the Dismissed

Indictment 08-09-316-I State of New Jersey vs. Thomas Caggiano brought by Borough of Stanhope officials and employees and that Richard A. Stein, Esq. further engaged with the Office of Attorney General's Division of Law GRC Deputy Attorney General Debra Allen, Esq. as shown in recent emails provided by the excellent GRC Sr. Case manager Frank Caruso to my Open Public Record Act request to the GRC that proves beyond any reasonable doubt there was a willful criminal conspiracy among the Borough of Stanhope's Ladley, Clark and Ryan LLC's Richard A. Stein, Esq. and the Office of Attorney General to obtain unconstitutional court orders that like Judge Mulhern's violate the Constitutions of the United States and Constitutions of New Jersey. Therefore the municipal prosecutor also violated the Code of Professional Conduct by not reporting Judge Mulhern for issuing such unconstitutional court orders and by his actions violated the code of ethics and violated State v. Gilchrist, 381 N.J. Super. 138, 144-146 (App. Div. 2005) and Rule 3:13-3[3.2.6] Information about persons with relevant information; witnesses. Whereas the prosecutor's willful violation not to provide exculpatory evidence, violated his obligations and denies Thomas Caggiano, the defendant, a fair trial as noted in State V. Blake, 234 N.J. Super. 166 (App. Div. 1989). Furthermore the prosecutor violated the general principles of R 3.31 being Brady v. Maryland, 373 U.S. 83 (1963), State v. Marshall, 148 N.J. 89, 185-189 (1997), and State v. Parsons, 341 N.J. Super. 448, 455 (App. Div. 2001). Both Richard A. Stein, Esq. and William Hinkes, Esq. have been referred to the Office of Attorney Ethics as the case was removed from District XA Ethics Committee by the OAE under prior Docket No. XA-10-018E now separated into two dockets before the OAE.

**5. Please take FURTHER notice:** That a proposed form of ORDER Pursuant to Rule 1:6-2 are Annexed Hereto.

**6. Please take FURTHER notice:** I, Thomas Caggiano, am a witness per the direction of the Federal Department of Justice's Special Agent in Charge in Washington D.C. of the Office of Inspector General to the FBI Investigative Inspector in Washington D.C., the United States Postal Service Inspection Service for mail fraud, conspiracy and harassment, the Office of Personnel Management Federal Special Agents, the CIGIE which reports to the President of the United States of America, the IRS HQ in Washington D.C., the Office of Comptroller/Inspector General of NJ, the Supreme Court Office of Attorney Ethics and DRB, ACJC and OAC, the Office of Attorney General for New Jersey, and other investigators.

**7. Please take FURTHER notice:** I and my wife Kathryn Caggiano have been witnesses to the State Police Official Corruption Bureau for years having met SGTs in the Hughes Justice Complex and provided CDs of evidence and audio recordings of corrupt Superior Court Judges in Mercer County. Our Point of Contact works directly in West Trenton, Hq and is SGT Little's Badge 5373 and have personally assisted others; namely, the excellent Sgt Eric Fowlkes Badge 4792, DSG Luberlazzi Badge 5179, DSFC Cambers 3615 and the Augusta Barracks' State Police Detective Sgt Brown recused himself when I and my wife presented about 2 cubic feet of evidence. The Sussex County former First Assistant Prosecutor William Fitzgibbons and another Sussex County Detective recused themselves when I presented evidence in the High Street Grand Jury room. The 21 minute audio recording is published on <http://freedomnewsdigest.com> or through its alternative address <http://thomascaggiano.com>. The audio recording is directly available on any internet connection via:

<http://thomascaggiano.com/060614fitzgibbonsscpo.mp3>

8. **Please take FURTHER notice:** The Sussex County Administrator John Eskilson, the County's "CEO", 973-579-0250, has twice requested the Sussex County Sheriff Untig and Sussex County Prosecutor's David Weaver's Office to conduct an investigation of my illegal imprisonment in Sussex County Jail by repeated violations of court rules as determined by Superior Court Judge N. Peter Conforti, J.S.C. based upon motions to the Joint Municipal Court in Green wherein Judge Mulhern, J.M.C. transferred numerous malicious petty disorder charges filed by Borough of Stanhope Officials to obstruct justice, continue perjury and false unsworn statements made by its Borough Attorney Richard A. Stein, of Laddey, Clark and Ryan LLC. The corruption continues.

6. **Please take FURTHER Judicial Notice per Rule 201** Article II Judicial Notice of Law and Adjudicative Facts and the new Open Public Records Act permitting OPRA requests by email, fax, on written correspondence and the Constitution of the United States and Constitution of the State of New Jersey ALLOWING Freedom of Assembly denied in Judge Mulhern's court orders.

7. **Please take FURTHER notice** under the Dismissed criminal indictment with Prejudice, State of New Jersey v. Thomas Caggiano, Ind 08-09-316-I, by Superior Court Judge N. Peter Conforti, J.S.C. against the Sussex County Prosecutor's Office on May 11, 2010 under State of New Jersey v. Thomas Caggiano, Ind 08-09-316-I two involuntary mental examines were conducted and both State Phd's being Dr. Joseph and Dr. Paul agreed I was NOT a threat to myself, NOT a threat to any other person and NOT a threat to private property and have NEVER been convicted of any indictable offense, am NOT on probation, and all fines by Judge Craig U. Dana, J.M.C. were vacated by the Superior court on Sep 10, 2010. That Judge Conforti, J.S.C. court orders are inconsistent within themselves and unconstitutional and he has been referred to the Department of Justice, FBI, Office of Attorney General of New Jersey's Law and Public Safety Department and Affidavits of Probable Cause were filed against Judge Mulhern, JMC but improperly dismissed by the corrupt Superior Court Judges in Morristown Superior Court as even court orders were illegally issued against my wife Kathryn Caggiano by the corrupt Judge Thomas Manahan without her knowledge, without due process that she can't file in any municipal court petty disorder CDR-1 charges against any person or law firm and was not even provided a copy of the court order violating due process in criminal coercion and witness intimidation as Judge Dana threatened by wife in his corrupt court and Brian Smith, Esq. the lawyer for the State's Sussex County Soil Conservation District threatened both Mary Pawar and Iqbal Pawar by referring them as "shills" as they provided copies of their formal complaints filed against John Cilo Jr. with the Office of Attorney General's Board of Engineers under complaints #05-13.a and #05-13.b.

8. **Please take FURTHER notice** adopted by reference per Rules 1:4-3 and R. 3:13-3 [3.2 Relevance] is the widely distributed 36 page report filed in Sussex County Superior Court, the Sussex County Prosecutor's Office, Newton Municipal Court and attached and published on <http://thomascaggiano.com/101107conforti.pdf> that provides copies of NEW EVIDENCE provided to me by the State of New Jersey in that e-mails between Richard Stein, Esq. and Debra Allen, Esq., and other letters

from the State of New Jersey agencies and the Borough of Stanhope and recent evidence provided by the GRC's Sr. Staff that a conspiracy among the Office of Attorney General's Division of Law's Government Record Council's Debra Allen, Esq. and the Laddey, Clark and Ryan LLC's Borough of Stanhope's Borough Attorney Richard A. Stein, Esq. in obtaining unconstitutional court orders in Mercer County, Sussex County and Morris County has existed for years. The report is adopted as a referenced exhibit with all evidence in the Sussex County Prosecutor's Office, and the Superior Court of Sussex County on the malicious convictions and malicious so called hearing on my municipal appeals held by the dishonorable N. Peter Conforti, J.S.C. even before the brief was scheduled in his Oct 5, 2010 court order on my municipal appeals of all Judge Dana's corrupt municipal court convictions as ALL fines were returned over 1 year ago and all probation thereafter vacated. I also adopt the 200 plus page filing in Newton Municipal Court and Netcong municipal court, and Department of Community Affairs Local Finance Board; this report is published on <http://thomascaggiano.com/tyrannyexposed.pdf> and is adopted by reference including its linked pages.

**9. Please take FURTHER notice** that on \_\_\_\_\_ at \_\_\_\_\_ in a telephone conference if required for oral argument if there is disagreement with the proposed court order that a teleconference be held among Thomas Caggiano, 702-576-6768, the municipal judge for Wantage/Stillwater/Borough of Sussex County municipal court or alternate and Prosecutor for Change of Venue and then a Summary Judgement to vacate the unconstitutional court orders issued by Judge Mulhern, J.M.C., in his Stillwater/Hampton municipal court under the above summons and return fines and court cost imposed by the Hon. Mulhern, J.M.C. on the malicious petty order convictions filed by the State Sussex County Soil Conservation District Manager Winifred Straub for fraud, trickery and violation of the Open Public Meetings Act, the U.S. Constitution's Bill of Rights and State of New Jersey Constitution and placement on the SLAP inmate program as Mary Pawar, 12 East Drive, Stanhope, New Jersey, a witness brought to the court upon issuance of a subpoena for filing an Open Public Record Act was NOT allowed by Judge Mulhern, J.M.C. in violation of the Constitutions of the United States of America, the Constitution of New Jersey and the Code of Judicial Conduct also violated by the municipal prosecutor's violation of Rules of Professional Conduct (RPC) by not providing exculpatory evidence, by violation of R. 1:14 (1.6) General Ethical Obligation to see that justice is done rather than merely to obtain a conviction as noted in State v. Harvey, 176 N.J. 522, 529 (2003). Whereas new evidence of fraud among the State's Sussex County Soil Conservation District was provided in its lawyer's law firm of Dolan and Dolan PA, on Oct 28, 2010 in response to Thomas Caggiano's OPRA request that admitted that NO certified Soil Erosion and Sediment Control Plan for the Project, a minor sub-division Block 10902 Lots 10 and 12, 2 and 6 Oak Drive, and whereas fraud was conducted by E.N.F. Development Co. LLC in preparing falsely filed deeds with the Sussex County Clerk. Whereas based upon a meeting with the Sussex County Clerk and advice given her by the Sussex County Counsel, I Thomas Caggiano, provided copies of the falsely prepared deed for 6 Oak Drive, with prior deeds signed by the Borough of Stanhope Board of Adjustment that was made known to the Sussex County Soil Conservation District and whereas safety and health issues of the neighbors were provided the Sussex County Prosecutor's Office whereas NOT reporting such violations of the Soil Erosion and Sediment Control Act, the State of New Jersey Construction Codes as two falsely issued full certificates of occupancy were issued by the Borough of Stan-

hope without any approval by a municipal engineer that was contracted per the Local Public Contracts Law and whereas the Board of Chosen Freeholders for Sussex County was provided the false certified Soil Erosion and Sediment Control Plan for only 1/2 a project was signed by the District Manager Clifford Lundin, Esq. and the State executive secretary for the Department of Agriculture James Sadley conspired with the State Soil Conservation District in planning the malicious charges filed by Winifred Straub in the Stillwater/Hampton municipal court and in Hopatcong's municipal court by Clifford Lundin, Esq. to prevent the apprehension of the corruption and bribery by the Borough of Stanhope with John Cilo Jr., of John Cilo Jr. Associates as he had NO valid contract with the Borough of Stanhope, and whereas the conspiracy of the Office of Attorney General's Division of Law's Government Record Council's Debra Allen, Esq. and the Borough of Stanhope's Laddey, Clark and Ryan LLC Borough Attorney Richard A. Stein, Esq. has conspired with various State agencies as noted in emails provided by the excellent GRC Sr. Case Manager Frank Caruso now filed in Sussex County Superior Court of Judge N. Peter Conforti, JSC, the Sussex County Prosecutor's Office, the Department of Community Affairs, the Office of Attorney Ethics, the Advisory Committee on Judicial Conduct, the Sussex County Administrator, the FBI in New Jersey and Washington D.C., the United States Postal Service Inspection Service and whereas the criminal indictment brought by the State's Sussex County Soil Conservation District's confederates in the Borough of Stanhope were dismissed with prejudice and based upon the instructions from the FBI in Las Vegas, Nv published on <http://thomascaggiano.com/fbi.jpg> and whereas the Office of Attorney Ethics has taken control of the investigation of Richard Stein, Esq. and William Hinkes, Esq. and their law firms from the District XA Ethics Committee for Sussex County, and whereas over 2,700 pages of evidence of exculpatory evidence in application file SH#44 was not provided by the Municipal Prosecutor who violated State v. Ruffin, 382 N.J. Super. 44, 56-57 (App. Div. 2005), Rules of Professional Conduct (RPC) 3.8 Special Responsibilities of a Prosecutor, RPC 5.1 Responsibilities of Partners, Supervisory Lawyers, and Law firms, RPC 8.3 Reporting Professional Misconduct and RPC 8.4 Misconduct, and whereas my wife also is a witness to the State Police's Official Corruption Bureau with Thomas Caggiano having provided evidence and audio recordings of court proceeding that were unconstitutional in Mercer Superior Court wherein the Government Record Council and the corrupt Superior Court Judges issued unconstitutional court orders and whereas the Freedom of Speech, Freedom of Assembly, Freedom of Presenting Grievances to protect the Safety and health of the inhabitants of the Borough of Stanhope were denied in Judge Mulhern's unconstitutional court orders, I hereby make a summary judgement request that All Judge Mulhern's court orders issued on cases brought by Winifred Straub, in State v. Thomas Caggiano be vacated and the fines and court costs determined with interest and paid Thomas Caggiano.

**10. Please take FURTHER notice** recusal of Judge Mulhern, J.M.C. and Judge Craig U. Dana, J.M.C. is requested per Carey v. State, 405 A. 2d 292 (Md. Ct. Spec. App. 1979), cert. denied, 445 U.S. 967 (1980) as Judge Mulhern, J.M.C. conspired with Judge N. Peter Conforti, J.S.C. in preventing the filing of Affidavits of Probable Cause with CDR-1 AND CDR-2 in the Newton Municipal court for various petty disorder charges and other indictable offenses without any probable cause hearing by a municipal judge violating his Code of Ethics as did Judge N. Peter Conforti, J.S.C. These Affidavits of Probable Cause were filed as court documents under the now Dis-



missed with Prejudice criminal indictment on 13 charges by the Borough of Stanhope officials on May 11, 2010 WITH PREJUDICE.

11. **Please take FURTHER notice:** The proposed motion is provided the court and municipal prosecutor with the adopted, attached exhibits. Witnesses include if required the Borough of Stanhope new Town administrator Richard Stewart, the former Municipal Clerk Robin Kline, Mary Pawar 12 East Drive, Stanhope, N.J., the State police officer Sgt Eric Fowlkes Badge 4792, the former GRC chairman Vince Maltese, Esq., my stand-by attorney in the municipal appeals Robert Mattia, Esq., the Newton Deputy Court Administrator Tania Ell, the Borough of Stanhope Court Administrator Ms. Lupo, the Township of Green court administrator, the hostile witnesses Catherine Starghill, Esq. the GRC executive director, Arthur Russo, as a hostile witness being the executive director of the Board of Engineers and Board of Professional Planners, and others all of whom have extensive knowledge of my performing by public duty to protect the health, safety and private property of those living in the Borough of Stanhope as exemplified by a letter to the Borough of Stanhope signed by fifteen property owners published and adopted by reference on

**<http://thomascaggiano.com/060508ltr15people.pdf>**

12. The proposed motions are attached. This letter with the proposed motions is published by Inside on the Outside at <http://thomascaggiano.com/110706wantage.pdf>

13. **Please take FURTHER notice:** The following letters are referenced exhibits to support this motion and the references therein are adopted as exhibits as they are "Relevant Evidence" per Court's Rule of Evidence 401.

a. FBI, letter, Jan 25, 2010 from U.S. Department of Justice's FBI Special Agent in Charge Kevin Favreau to Thomas Caggiano informing him to report criminal acts to the FBI in Newark, N.J. and mail fraud, and interception of mail to the U.S.P.S. Inspection Service. Such actions have been coordinated with the U.S. P.S. in Az, Il, and New Jersey's Newark U.S.P.S. Inspection Services including postmaster's in the Borough of Stanhope and Borough of Netcong. **This letter is published on <http://thomascaggiano.com/fbi.jpg> as a public record.**

b. Chart, Smoking Guns, published under <http://thomascaggiano.com/smoking-guns.jpg> showing emails between the conspirators being the Borough of Stanhope's Richard Stein and the Office of Attorney General's Division of Law Debra Allen, Esq. provided by the excellent Sr. Case Manager and highlighted by the Government Record Council's Oct 27, 2010 letter in response to my OPRA Request to the GRC 2010-23 as the Docket SSX-L-847-07 Caption Borough of Stanhope v. Thomas Caggiano and Government Record Council was changed in violation of court rules and purpose was changed as Judge Bozonelis, A.J.S.C. has not held any additional hearings on the malicious civil suite filed to prevent detection and apprehension of the racketeering in the Borough of Stanhope for over a decade. The Docket was filed Dec 18, 2007 and NO hearing with the rights of confrontation of witnesses or affiants has been held in almost three years.

c. Verified Certified Affidavit by Thomas Caggiano to the Department of Law and Public Safety, published on <http://thomascaggiano.com/101117dcjcriminalreport.pdf>

with an embedded email to the U.S. Attorney (N.J.), FBI, New Jersey State Senators and Members of the Assembly, newspapers, State, County and municipal governments and the public, submitted Nov 17, 2010 at 17:02:37. All referenced documents therein are also adopted for relevance in this CERTIFIED VERIFIED AFFIDAVIT

d. Court filed letter, 36 pages, prepared by Thomas Caggiano and filed in Sussex County Superior Court, Nov 7, 2010, Office of Administrative Law, ACJC, Office of Administrator of the Courts, Vicinage Assignment Judge Bozonelis, A.J.S.C., Appellate Court, FBI Inspection Service, Office of New Jersey Attorney General and published on <http://thomascaggiano.com/101107conforti.pdf>, subject: State of New Jersey v. Thomas Caggiano Municipal Appeal No. 13-4-08 and 19-04-09 Moving Papers for Notice of Motions, Motion for Dismissal with Prejudice, Motion for Change of Venue in advent Motions are not granted by Judge Conforti, J.S.C. and Motion to Vacate Judge N. Peter Conforti, J.S.C., unconstitutional court orders which he issued in violation of the Constitution of the United States of America, the Constitution of New Jersey, the Open Public Records Act, the Open Public Meetings Act. All documents noted therein are adopted as exhibits to this Verified Certified Affidavit.

e. Request for Reconsideration, filed by Thomas Caggiano to the corrupt Department of Community Affairs' Government Record Council's executive director Catherine Starghill, Esq. on Nov 8, 2010 and published on <http://thomascaggiano.com> for Thomas Caggiano v. Borough of Stanhope OPRA Denial of Access of OPRA complaints 2010-132, 133, 173 and 211. It is noted that Judge Bozonelis, AJSC ordered the Borough of Stanhope to respond to written OPRA requests in his court order which is also embedded in Judge N. Peter Conforti, J.S.C. court order as Judge Dana's court orders violate all due process, the court orders of his Vicinage Assignment Judge, OPRA, and are unconstitutional. All documents referred therein are adopted as exhibits.

f. Thomas Caggiano, prior work experience and 30 year career summary background with various awards the teams I had the honor of leading are included. I was a member of the Army Acquisition Corps and knowledgeable in over fifty fields. Published on <http://thomascaggiano.com/tcb.pdf>

g. Letter, Sep 8, 2010, Borough of Stanhope's corrupt Borough Clerk Ellen Horak, RMC to me that violates the court order by Judge Bozonelis, A.J.S.C., violates the court order by Judge N. Peter Conforti, J.S.C., violates the Open Public Meetings Act and Borough of Stanhope regulations on sending agenda's of open public meetings at least 48 hours in advance, and violation of the Constitution of the United States of America and Constitution of New Jersey and obstructs the administration of justice.

**12. Please take FURTHER notice:** On Oct 18, 2010, when I attempted to examine court records in the Borough of Stanhope as can be confirmed by the Town Administrator Richard Stewart who attempted to gain me access to the court records, he was informed falsely by the Borough of Stanhope's municipal prosecutor and Borough Attorney Richard A. Stein, Esq. that the Oct 19, 2010 hearing before Judge Conforti, J.S.C. was cancelled and that I should NOT proceed to the Sussex County Superior Court but return to my home in North Las Vegas, Nv. Upon my insisting to the Chief of Police and the Town Administrator that Richard Stein, Esq. continued his lies, I

was then threatened with arrest and bail. I went immediately to the Sussex County Superior Court and notified the Criminal Division Staff member Kay Mack who immediately informed Judge N. Peter Conforti, J.S.C. and a member of the Sussex County Prosecutor's Office. The court orders issued by Judge Conforti, JSC on Oct 5, 2010 stated a brief was NOT due for 21 DAYS THAT WAS Oct 26, 2010 and I immediately requested an adjournment as I was not per court order permitted to even hire an attorney until a court order was issued by Judge Conforti on Oct 13, 2010. And I adopt by reference all documents submitted to the Appellate Division Superior Court, State of New Jersey vs. Thomas Caggiano, under Docket A-001721-10 of my Pro Se filing of both Judge Conforti, J.S.C. illegal court orders and that of Judge Craig U. Dana, J.M.C. that violate the constitutions of the United States of America, and the State of New Jersey, OPMA, OPRA and other federal and state laws. The municipal appeals were 13-04-09 and 19-05-09 of Judge Craig U. Dana's kangaroo court and court orders that violate Federal criminal statutes 18 U.S.C. Sections 241 and 242. Please note per instructions from the Department of Justice's Acting Inspector General of the United States of America through my State of Nevada Congresswoman, I am now directed to provide evidence directly to the FBI HQ in Washington D.C., and based upon a letter from Special Agents in the U.S. Treasury Department I am directed to provide evidence directly to the Washington D.C. Hq, The United States Postal Inspection Hq has directed me to provide evidence directly to their criminal investigators for mail fraud, conspiracy and harassment and over 40 persons have requested investigations including the State of New Jersey's Federal Senator, Congressman, Senate President Codey, D-24 Senator Littell, the Office of Attorney General's former Director of Consumer Affairs Kimberly Ricketts, the DEP Commissioner Lisa Jackson, 16 property owners in the Borough of Stanhope, the Borough of Stanhope's Chairman of the Stanhope Environment Commission, the Borough of Stanhope's Code Enforcement Official Arlene Fisher, the Office of Gov staff member Ian Brennan, the Office of Attorney General's Fiscal Bureau, the Department of Education's auditor, and others. The State Police Official Corruption Bureau Sgts were met by my wife Kathryn Caggiano and myself and provided audio recordings of corrupt Judges and corrupt Office of Attorney General of NJ Deputy Attorney General for the GRC Debra Allen, Esq. and while we were in the Hughes Justice Complex agreed to use our published web site <http://freedomnewsdigest.com> or directly via <http://thomascaggiano.com> as a "interest parties" list or as could be referred a "target list". The report available under <http://thomascaggiano.com/tyrannyexposed.pdf> is adopted as an exhibit to this motion as a relevant exhibit including the links and reports on <http://thomascaggiano.com/page400.htm> including the audio recording made in the Sussex County Prosecutor's Office with its former 1st Assistant Prosecutor Bill Fitzgibbons and a County paid detective therein published on:

<http://thomascaggiano.com/060614fitzgibbonsscpo.mp3>

13. **Please take FURTHER notice:** The Township of Green has refused to allow me to obtain its court records or photograph evidence submitted thereto and as stated I believe false by Judge Dana, J.M.C. per a secret court order by Judge Bozonelis, A.J.S.C. NO defendant can obtain court records such as CD audio recording, transcript records on a CD ROM needed for an Appellate Court appeal. These are signed court records as a cover-up of the Borough of Stanhope's pandemic corruption is protected by now over 180 persons. The U.S.P.S. has assigned its own HQ to conduct a

massive mail fraud investigation covering hundreds of documents, published reports, news bulletins and other materials mailed to thousands of persons.

14. **Please take FURTHER notice**In addition, my letter to the OAC, OAE, ACJC and United States of America United States Post Office Inspection Service for criminal mail fraud, conspiracy and harassment is adopted by reference to support this motion and is published on <http://thomascaggiano.com/110703usps.pdf>

15. **VERIFIED CERTIFIED AFFIDAVIT:** I certify the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false that I am subject to punishment.

16. This document is published under the freedom of the press by Inside on the Outside, a registered State of Nevada Business enterprise on:

**<http://thomascaggiano.com/110706wantage.pdf>**

**Signed electronically**

*Thomas Caggiano*

**Jul 6, 2011**

Thomas Caggiano  
7086 Arcadia Glen Court  
North Las Vegas, Nv 89084  
Pro Se  
thomas\_caggiano@yahoo.com  
702-586-6768

---

State of New Jersey,  
Plaintiff

vs.

Thomas Caggiano  
Defendant

| Municipal Court of New  
| Jersey

| Joint Municipal Court of  
| Wantage, Stillwater and  
| Borough of Sussex

| Dockets: S-2003-000083/84

| **ORDER**

| Change of Venue

---

**This matter** being opened to the court by the defendant Thomas Caggiano and for reasons cited in his Certified Verified Affidavit and letter brief dated Jul 6, 2011 whereas apparent conflicts of interest exist among Thomas Caggiano, the court magistrate Hon. Craig U. Dana, J.M.C. and the Municipal prosecutor William T. Haggerty in his multiple duties as Dolan and Dolan PA attorney for the Sussex County Soil Conservation District, the Borough of Stanhope Land Use Board and joint municipal court prosecutor

**IT IS ON THIS** \_\_\_\_\_ of \_\_\_\_\_, 2011

**ORDERED** that a change in venue is hereby ordered and the CASE transferred to

\_\_\_\_\_  
Hon. Craig U. Dana, J.M.C.

Thomas Caggiano  
7086 Arcadia Glen Court  
North Las Vegas, Nv 89084  
Pro Se  
thomas\_caggiano@yahoo.com  
702-586-6768

---

State of New Jersey,  
Plaintiff

vs.

Thomas Caggiano  
Defendant

| Municipal Court of New  
| Jersey

| Joint Municipal Court of  
| Wantage, Stillwater and  
| Borough of Sussex

| Dockets: S-2003-000083/84

|  
|  
| **ORDER**

| Summary Judgement  
| Vacating Court ORDERS  
| issued by Stillwater  
| and Hampton Municipal  
| court

---

**This matter** being opened to the court by the defendant Thomas Caggiano on a Summary Judgement motion and for reasons cited in his Certified Verified Affidavit and letter brief dated Jul 6, 2011 whereas the court orders issued by the Hon. John Mulhern, J.M.C. conflict with the U.S. Constitution, State of New Jersey Constitution, new Open Public Record Act and new Open Public Meetings Act, and Common Law

**IT IS ON THIS** \_\_\_\_\_ of \_\_\_\_\_, 2011

**ORDERED** that the court restrictions issued by the court are vacated in their entirety.

---