



CIVIL CASE INFORMATION STATEMENT

(CIS)

Use for initial Law Division

Civil Part pleadings (not motions) under Rule 4:5-1
**Pleading will be rejected for filing, under Rule 1:5-6(c),
 if information above the black bar is not completed or
 if attorney's signature is not affixed.**

FOR USE BY CLERK'S OFFICE ONLY

PAYMENT TYPE: ☒ CK ☐ CG ☐ CA

CHG/CK NO.

AMOUNT:

OVERPAYMENT:

BATCH NUMBER:

ATTORNEY/PRO SE NAME

MICHAEL J. DEEM

TELEPHONE NUMBER

(732) 505-1212

COUNTY OF VENUE

Ocean

FIRM NAME (if applicable)

R. C. SHEA & ASSOCIATES, P.C.

DOCKET NUMBER (When available)

OFFICE ADDRESS

244 Main Street
 P.O. Box 2627
 Toms River, New Jersey 08754

DOCUMENT TYPE

Complaint

JURY DEMAND

☒ YES ☐ NO

NAME OF PARTY (e.g., John Doe, Plaintiff)

Joseph Vicari, Plaintiff

CAPTION

Joseph Vicari, Plaintiff, v. Timothy Ryan, William Santos, Alice Santangelo,
 Vision Media Marketing, Inc., John Does 1-100, ABC Corp., 1-100,
 Defendants

CASE TYPE NUMBER

(See reverse side for listing)

609

IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ☒ NO

IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING
 YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.

RELATED CASES PENDING?

☐ YES ☐ NO

IF YES, LIST DOCKET NUMBERS

DO YOU ANTICIPATE ADDING
 ANY PARTIES (arising out of same
 transaction or occurrence)?

☐ YES ☒ NO

NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY, IF KNOWN

☐ NONE
☒ UNKNOWN

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? ☐ YES ☐ NO

IF YES, IS THAT
 RELATIONSHIP

☐ EMPLOYER-EMPLOYEE
☐ FAMILIAL

☐ FRIEND/NEIGHBOR ☐ OTHER (explain)
☐ BUSINESS

DOES THE STATUTE GOVERNING THIS
 CASE PROVIDE FOR PAYMENT OF FEES
 BY THE LOSING PARTY?

☐ YES ☒ NO

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?

☐ YES ☒ NO

IF YES, PLEASE IDENTIFY THE
 REQUESTED ACCOMMODATION:

WILL AN INTERPRETER BE NEEDED?

☐ YES ☒ NO

IF YES, FOR WHAT LANGUAGE:

**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).**

ATTORNEY SIGNATURE:

[Signature]



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I — 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (INCLUDING DECLARATORY JUDGMENT ACTIONS)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (SUMMARY ACTION)
- 999 OTHER (Briefly describe nature of action)

Track II — 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603 AUTO NEGLIGENCE — PERSONAL INJURY
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE — PROPERTY DAMAGE
- 699 TORT — OTHER

Track III — 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES
- 620 FALSE CLAIMS ACT

Track IV — Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Centrally Managed Litigation (Track IV)

- 280 Zelnorm
- 285 Stryker Trident Hip Implants

Mass Tort (Track IV)

- | | |
|---------------------------------------|--|
| 248 CIBA GEIGY | 279 GADOLINIUM |
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL |
| 271 ACCUTANE | 282 FOSAMAX |
| 272 BEXTRA/CELEBREX | 283 DIGITEK |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 284 NUVARING |
| 275 ORTHO EVRA | 286 LEVAQUIN |
| 277 MAHWAH TOXIC DUMP SITE | 601 ASBESTOS |
| 278 ZOMETA/AREDIA | 619 VIOXX |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category:

☐ Verbal Threshold

☐ Putative Class Action

☐ Title 59

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RCS:MJD:CRS/KFS FILE NO. 09663

NOV 21 2014

OCEAN COUNTY

JOSEPH VICARI

Plaintiff

v.

TIMOTHY RYAN, WILLIAM
SANTOS, ALICE SANTANGELO,
VISION MEDIA MARKETING, INC.,
PAUL SWIBINSKI, JOHN DOES 1-
100 (a fictitious name for persons
presently unknown) and ABC CORP.
1-100 (a fictitious name for a business
entity presently unknown),

Defendants

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: OCEAN COUNTY

DOCKET NO. OCN-L-

CIVIL ACTION

COMPLAINT

The plaintiff, JOSEPH VICARI, who resides in the township of Toms River, County of Ocean and State of New Jersey, by way of Complaint against the defendants state:

1. Joseph Vicari is and has been at all times relevant hereto an Ocean County Freeholder who has been qualified to serve, has been re-elected to serve the people of Ocean County for twelve (12) consecutive terms, and has in fact, served Ocean County in that capacity for over thirty-three (33) years with honesty and fidelity, having never been

guilty of any misconduct.

X. At all times prior to the 2014 election has enjoyed a good name and reputation.

2. In 2014, Joseph Vicari ran for re-election as an Ocean County Freeholder.

3. Defendant, Timothy Ryan, hereinafter referred to as "Tim Ryan", who resides at 1408 Isabella Court, in the Township of Toms River, County of Ocean, State of New Jersey, ran for the office which Joseph Vicari currently occupies in the election year of 2014.

4. In doing so however the defendant, Tim Ryan and his co-defendants violated the most sacred biblical principle of ethics: "though hall not bear false witness against your neighbor."

5. Defendant, Tim Ryan, as will be set forth below, engaged in a campaign of lies, defamation, libel and slander with one purpose: to injure plaintiff, Joseph Vicari by exposing plaintiff, Joseph Vicari to hatred, contempt and ridicule thereby causing plaintiff, Joseph Vicari to lose his good will and confidence of others.

6. Tim Ryan's political informant, defendant William Santos, hereinafter referred to as "Bill Santos", resides at 457 Leming Road, in the Township of Jackson, County of Ocean and State of New Jersey.

7. At all times relevant hereto defendant, Alice Santangelo, hereinafter referred to as "Santangelo", was a Campaign Treasurer hired and/or paid by defendant, Tim Ryan.

8. Upon information and belief and at all times relevant hereto, defendant

Santangelo had direct control over any and all medium of publication that were funded by the "Tim Ryan for Freeholder" campaign depository.

9. Upon information and belief defendant, Vision Media Marketing Inc., hereinafter referred to as "Vision Media", is a corporation organized in 1985 and existing under the law of the State of New Jersey, with its principal place of business at 854 8th St. Secaucus, New Jersey 07094. Upon information and belief and at all times relevant hereto Vision Media is a political marketing firm that is directed by defendant Paul Swibinski and who were hired and/or paid by defendants, Tim Ryan and Santangelo during the election year of 2014.

10. Defendants ABC Corps. 1-100 and John Does 1-100 are fictitious names representing one or more legal entities and/or individuals whose names are presently unknown and who either directly and/or indirectly and/or in concert participated and/or were responsible by their conduct, acts and/or omissions with respect to one or more of the causes of action and/or one or more of items of damages set forth in this complaint.

11. Throughout defendant, Tim Ryan's 2014 campaign for Freeholder, defendants, Tim Ryan, Bill Santos, Alice Santangelo, Vision Media and Paul Swibinski, acting individually or in concert, engaged in a repeated and malicious course of conduct with the purpose of defaming plaintiff, Joseph Vicari and perpetuating a fraud upon the citizens of Ocean County through the malicious dissemination of false information.

12. Defendant, Tim Ryan and his political militia may not admit that they have spread lies about plaintiff, Joseph Vicari but a liar knows that one who speaks mere

portions of truth in order to deceive the public is a craftsman of destruction.

13. So, without a scintilla of evidence defendants Tim Ryan, Bill Santos, Alice Santangelo, Vision Media and Paul Swibinski, in their concerted effort to support, endorse and further defendant, Tim Ryan's campaign efforts, maliciously contrived certain false statement that, for instance, defendant, Tim Ryan's opponent plaintiff, Joseph Vicari, was under investigation by the FBI for criminal misconduct **and was corrrpt**.

14. These craftsmen of destruction have taken political "mud-slinging" to unprecedented heights, for even a tiny bit of deceit is dishonorable when it's used for a selfish or cowardly reason....like seeking a seat on the Board of Chosen Freeholders.

15. Hence, as a result of the malicious and deceitful campaign tactics employed by the defendant Tim Ryan's Campaign as well as his craftsmen of destruction, plaintiff, Joseph Vicari was forced to endure a barrage of defamatory and falsely contrived publications, news articles, editorials, commercials, facebook posts, flyers, mailers and posters all of which emanated from defendant, Tim Ryan's maliciously contrived imagination such as his infamous "FBI investigation" lie.

16. The evils of the body are murder, theft and adultery; *of the tongue: lying, slander, abuse and idle talk*, and of the mind: covetousness, hatred and error. The evil and malicious lies disseminated by the defendants against plaintiff, Vicari attempted to not only malign his reputation but also was intended to commit a significant fraud on the voting public.

COUNT ONE

1. Throughout the election year of 2014 defendant, Tim Ryan, his agents, servants and employees and craftsman of destruction, who were acting at his direction wrote letters which he had published in the numerous newspapers, throughout Ocean County, New Jersey, and the surrounding areas.

2. In these letters, defendant, Tim Ryan maliciously and falsely accused plaintiff, Joseph Vicari of scandal, dishonesty, breaking state election laws, sexual harassment, secrecy, political patronage, intimidation, corruption and fiscal irresponsibility.

3. These letters also falsely stated that plaintiff, Joseph Vicari was under criminal investigation by the Federal Bureau of Investigation ("FBI"), that Joseph Vicari would be "taken out in handcuffs" by the FBI and that "after 30 years in office, [Vicari] has turned into one of the greediest and most corrupt political bosses in New Jersey history".

4. These letters also attempted to associate plaintiff, Joseph Vicari with "Sex and Money" and have accused him of taking "bribes."

5. At the time of publishing the letters defendant, Tim Ryan, his agents, servants and employees who were acting at his direction, had actual knowledge that the content of the letters were false and acted with reckless disregard of its truth knowing that the content of the letters were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

6. In disseminating the information to the public, defendant, Tim Ryan acted

intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

7. In fact, it has been said for ages that "a fair-minded person knows that just because something isn't a lie doesn't mean that it isn't deceptive. A liar knows that he is a liar, but one who speaks mere portions of truth in order to deceive is a craftsman of destruction."

8. At all times relevant hereto, defendant Tim Ryan knew that publishing the statements would create a false impression and damage plaintiff, Joseph Vicari, Defendant, Tim Ryan's conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

9. The defamatory publications and statements made by defendant, Tim Ryan, and those acting at his direction injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendant Tim Ryan, for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT TWO

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014 defendant, Tim Ryan, his agents,

servants and employees who were acting at his direction distributed letters, flyers, emails, and mailers that were funded and published by the campaign of Tim Ryan for Freeholder.

3. The letters, flyers and mailers were authored and disseminated by defendant, Tim Ryan or at the direction of defendant, Tim Ryan to residents throughout Ocean County, New Jersey and the surrounding areas.

4. These publications falsely accused plaintiff, Joseph Vicari of being dishonest, guilty of breaking state election laws, guilty of sexual harassment, secrecy, political patronage, intimidation, corruption and fiscal irresponsibility.

5. The publications further falsely stated that plaintiff, Joseph Vicari was under criminal investigation by the Federal Bureau of Investigation ("FBI"), that Joseph Vicari would be "taken out in handcuffs" by the FBI and that "after 30 years in office, [Vicari] has turned into one of the greediest and most corrupt political bosses in New Jersey history".

6. These letters, flyers, emails, and mailers also attempted to associate plaintiff, Joseph Vicari with "Sex and Money" and have accused him of taking "bribes."

7. At the time of publishing defendant Tim Ryan knew that the contents of the letters, flyers, emails, and mailers were libelous and false and/or entertained serious doubt as to the truth of the statements contained within the letters, flyers, emails, and mailers. His actions were reckless to say the least.

8. In disseminating the information to the public, defendant, Tim Ryan acted in a grossly irresponsible manner with reckless disregard for the standards of truth and veracity ordinarily followed by responsible persons.

9. The defamatory publications and statements made by defendant, Tim Ryan, and those acting at his direction injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, and further caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendant Tim Ryan, for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT THREE

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014 defendant, Tim Ryan, and/or agents working on Tim Ryan's behalf, published television and internet commercials that circulated via cable television throughout Ocean County, New Jersey, and surrounding areas.

3. The commercials were the brain child of defendant, Tim Ryan and those working at his direction.

4. Defendant, Tim Ryan's commercials falsely state that plaintiff, Joseph Vicari is dishonest, guilty of sexual harassment, secrecy, political patronage, intimidation, corruption, and fiscal irresponsibility.

5. The commercials further falsely state that plaintiff, Joseph Vicari is under investigation by the "FBI".

6. At the time of publishing the commercials, defendant, Tim Ryan knew that

its contents were libelous, false and/or entertained serious doubt and reckless disregard of its truth.

7. The defamatory publications and statements made by defendant, Tim Ryan, and those acting at his direction injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendant, Tim Ryan, for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT FOUR

1. Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014, defendant, Tim Ryan, continually made statements that plaintiff, Joseph Vicari was under investigation by the FBI, that plaintiff, Joseph Vicari was one of the most corrupt political bosses in New Jersey, and that plaintiff, Joseph Vicari was one of the "most greedy political bosses in New Jersey."

3. Defendant, Tim Ryan communicated and published his lies to private individuals, editorial boards, and the general public with the purpose of disparaging and defaming plaintiff, Joseph Vicari.

4. Defendant, Tim Ryan's statements were published in the numerous newspapers that circulated throughout Ocean County, New Jersey and surrounding areas.

5. At the time of publishing the letters defendant, Tim Ryan, his agents,

servants and employees who were acting at his direction, had actual knowledge that the content of the letters were false and acted with reckless disregard of its truth knowing that the content of the letters were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

6. In disseminating the information to the public defendant, Tim Ryan, acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

7. At all times relevant hereto defendant, Tim Ryan, knew that publishing the statements would create a false impression and damage plaintiff, Joseph Vicari. Defendant, Tim Ryan's conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

8. The defamatory publications and statements made by defendant, Tim Ryan, and those acting at his direction injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendant, Tim Ryan, for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT FIVE

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014 defendant, Tim Ryan, his agents, servants and employees demonstrated their bias and discriminatory colors by making ethnic slurs at Italian Americans like plaintiff, Joseph Vicari.

3. Prominently published on defendant, Tim Ryan's personal facebook were disparaging ethnic and racial slurs against Italian Americans.

4. In particular, defendant, Tim Ryan associated plaintiff, Joseph Vicari with Mobsters and Gangsters such as Don Vito Corleone (The "God Father").

5. In particular, defendant Tim Ryan is quoted as saying to plaintiff, Joseph Vicari, "Leave the Taxpayers a \$25,000 bill. Take the Cannoli" which is an obvious reference to the "Godfather" movie where Clemenza's character utters: "Leave the gun, take the Cannoli" after killing Paulie Gatto.

6. The facebook page was published and disseminated by defendant, Tim Ryan to hundreds, if not thousands of his "friends".

7. Defendant, Tim Ryan's face book posts and, upon information and belief his private messages, accused plaintiff, Joseph Vicari contained ethnic slurs and disparagement and further wrongfully accused plaintiff, Joseph Vicari of being dishonest, guilty of breaking state election laws, guilty of sexual harassment, secrecy, political patronage, intimidation, corruption and fiscal irresponsibility.

8. At the time of publishing the defamatory content on his facebook page, defendant, Tim Ryan knew that the contents of his facebook posts concerning plaintiff, Joseph Vicari were libelous and false and/or entertained serious doubt as to the truth of the statements contained within the facebook posts. His actions were reckless to say the

least.

9. In disseminating the information to the public, defendant, Tim Ryan acted in a grossly irresponsible manner with reckless disregard for the standards of truth and veracity ordinarily followed by responsible persons.

10. The defamatory publications and statements made by defendant, Tim Ryan, and those acting at his direction injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, and further caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendant Tim Ryan, for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT SIX

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014 Defendant, Bill Santos, deliberately published statements in the numerous newspapers which circulated throughout Ocean County, New Jersey, and surrounding areas.

3. Within the publications the defendant, Bill Santos, accused plaintiff, Joseph Vicari of dishonesty, sexual harassment, secrecy, political patronage, intimidation, corruption, and fiscal irresponsibility.

4. The publications further stated that plaintiff, Joseph Vicari was under investigation by the "FBI", that plaintiff, Joseph Vicari was the target of an FBI probe.

5. At the time of publishing, defendant, Bill Santos, possessed actual knowledge that the content of his publication and statements were false and he acted with reckless disregard of its truth knowing that the content of the publications were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

6. In disseminating the information to the public defendant, Bill Santos acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

7. At all times relevant hereto defendant, Bill Santos, knew that publishing the statements would create a false impression and damage plaintiff, Joseph Vicari. Defendant, Bill Santos' conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

8. The defamatory publications and statements made by defendant, Bill Santos injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendant, Bill Santos, for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT SEVEN

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered

paragraphs as though set forth fully herein.

2. Throughout the election year of 2014 defendant, Bill Santos, made numerous defamatory and false statements about plaintiff, Joseph Vicari to defendant, Tim Ryan, the Ocean County Board of Freeholders and numerous other members of the general public throughout Ocean County, New Jersey.

3. In the published statements defendant, Bill Santos, accused plaintiff, Joseph Vicari of dishonesty, sexual harassment, secrecy, political patronage, intimidation, corruption, and fiscal irresponsibility.

4. The statements further stated that defendant, Bill Santos, had personal knowledge that plaintiff, Joseph Vicari was under investigation by the FBI, that the FBI had visited defendant, Bill Santos three times to question him about Freeholder Joseph Vicari, that the FBI conveyed plaintiff, Joseph Vicari was the target of the FBI's probe, that defendant, Bill Santos and a contractor X was an active participant in the FBI probe of plaintiff, Joseph Vicari.

5. At the time of publishing the said statements defendant, Bill Santos, had actual knowledge that the content of the publications were false and acted with reckless disregard of its truth knowing that the content of the statements and publications were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

6. In disseminating the information to the public defendant, Bill Santos, acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

7. At all times relevant hereto, defendant Bill Santos knew that publishing the statements would create a false impression and damage plaintiff, Joseph Vicari. Defendant, Bill Santos' conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

8. The defamatory publications and statements made by defendant, Bill Santosn, injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendant, Bill Santos, for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT EIGHT

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014, defendant Alice Santangelo, and/or an agent working on Santangelo's behalf, wrote letters that were published in numerous newspapers, that circulated throughout Ocean County, New Jersey, and surrounding areas.

3. In the letters, defendant, Santangelo and/or an agent working at Santangelo's direction falsely accused plaintiff, Joseph Vicari of dishonesty, breaking state election laws, sexual harassment, secrecy, political patronage, intimidation,

corruption, and fiscal irresponsibility.

4. At the time of publishing the said statements defendant, Santangelo, had actual knowledge that the content of the publications were false and acted with reckless disregard of its truth knowing that the content of the statements and publications were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

5. In disseminating the information to the public defendant, Santangelo, acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

7. At all times relevant hereto defendant, Santangelo, knew that publishing the statements would create a false impression and damage plaintiff, Joseph Vicari. Santangelo's conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

8. The defamatory publications and statements made by defendant, Alice Bill Santangelo, injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendant, Alice Santangelo, for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT NINE

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014, defendant, Alice Santangelo and/or an agent working under defendant, Santangelo's direction, created letters, flyers and mailers that were published by the Tim Ryan's Campaign and circulated throughout Ocean County, New Jersey, and surrounding areas.

3. Upon information and belief, the letters, flyers, and mailers were authored by defendant, Santangelo and/or an agent working under her direction, who mailed and distributed them to residents throughout Ocean County, New Jersey, and the surrounding areas.

4. In the letters, flyers and mailers, defendant, Santangelo states plaintiff, Joseph Vicari is dishonest, has broken state election laws and is guilty of sexual harassment, secrecy, political patronage, intimidation, corruption and fiscal irresponsibility.

5. The letters, flyers and mailers further stated that plaintiff, Joseph Vicari was under criminal investigation by the Federal Bureau of Investigation ("FBI"), that plaintiff, Joseph Vicari would be "taken out in handcuffs" by the FBI and that "after 30 years in office, [Vicari] has turned into one of the greediest and most corrupt political bosses in New Jersey history".

6. At the time of publishing the said statements defendant, Alice Santangelo, had actual knowledge that the content of the publications were false and acted with reckless disregard of its truth knowing that the content of the statements and publications

were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

7. In disseminating the information to the public defendant, Santangelo, acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

8. At all times relevant hereto defendant, Santangelo, knew that publishing the statements would create a false impression and damage plaintiff, Joseph Vicari. Defendant's conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

9. The defamatory publications and statements made by defendant, Alice Santangelo, injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendant, Santangelo, for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT TEN

1. Plaintiff Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014 defendant, Alice Santangelo, and/or an agent working under her direction published commercials that were circulated via

cable television throughout Ocean County, New Jersey and surrounding areas

3. The commercials were created and paid for by defendant, Santangelo and/or an agent working on her behalf.

4. In the commercials defendant Santangelo and/or an agent working on Santangelo's behalf falsely stated that plaintiff, Joseph Vicari is dishonest and is guilty of sexual harassment, secrecy, political patronage, intimidation, corruption, and fiscal irresponsibility.

5. Defendant Santangelo and her underlings also falsely stated that plaintiff, Joseph Vicari is under investigation by the "FBI".

6. At the time of publishing the said defamatory publications defendant, Alice Santangelo, had actual knowledge that the content of the publications were false and acted with reckless disregard of its truth knowing that the content of the statements and publications were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

7. In disseminating the information to the public defendant, Santangelo, acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

8. At all times relevant hereto defendant, Santangelo, knew that publishing the statements would create a false impression and damage plaintiff, Joseph Vicari. Defendant's conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

9. The defamatory publications and statements made by defendant, Alice Santangelo, injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendant, Santangelo, for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT ELEVEN

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014, defendants Vision Media, Paul Swibinski and/or an agent working on Vision Media's behalf, wrote letters that were published in various newspapers which were then circulated throughout Ocean County, New Jersey, and surrounding areas.

3. Upon information and belief the letters were authored by defendants Vision Media, Paul Swibinski and/or an agent working on its behalf, who placed it into the possession and control of various newspapers.

4. In the letters, defendants Vision Media, Paul Swibinski and/or an agent working under its control, accused plaintiff, Joseph Vicari of dishonesty, breaking state election laws, sexual harassment, secrecy, political patronage, intimidation, corruption, and fiscal irresponsibility.

5. The said publications further stated that plaintiff, Joseph Vicari was under

criminal investigation by the Federal Bureau of Investigation ("FBI"), that plaintiff, Joseph Vicari would be "taken out in handcuffs" by the FBI and that "after 30 years in office, [Vicari] has turned into one of the greediest and most corrupt political bosses in New Jersey history".

6. At the time of publishing the said statements defendants, Vision Media, Paul Swibinski, its agents, servants and employees responsible for the publication had actual knowledge that the content of the publications were false and acted with reckless disregard of its truth knowing that the content of the statements and publications were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

7. In disseminating the information to the public defendants, Vision Media and or Paul Swibinski acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

8. At all times relevant hereto defendants, Vision Media and Paul Swibinski, knew that publishing the statements would create a false impression and damage plaintiff, Joseph Vicari. Defendant's conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

9. The defamatory publications and statements made by said defendants, injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendants, Vision Media and Paul Swibinski jointly, severally and in the alternative for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT TWELVE

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014 defendant, Vision Media, Paul Swibinski and/or an agent working on Vision Media's behalf, drafted letters, flyers and mailers that were published for defendant, Tim Ryan's campaign.

3. Upon information and belief the letters, flyers and mailers were authored by defendants, Vision Media, Paul Swibinski and/or an agent working on Vision Media's behalf and who mailed them to residents throughout Ocean County, New Jersey and the surrounding areas.

4. In the letters, flyers and mailers defendants Vision Media and Paul Swibinski falsely stated states that plaintiff, Joseph Vicari is dishonest and is guilty of breaking state election laws, sexual harassment, secrecy, political patronage, intimidation, corruption and fiscal irresponsibility.

5. The said publications further stated that plaintiff, Joseph Vicari was under criminal investigation by the Federal Bureau of Investigation ("FBI"), that plaintiff, Joseph Vicari would be "taken out in handcuffs" by the FBI and that "after 30 years in office, [Vicari] has turned into one of the greediest and most corrupt political bosses in

New Jersey history”.

6. At the time of publishing the said statements defendants, Vision Media, Paul Swibinski and its agents, servants and employees responsible for the publication had actual knowledge that the content of the publications were false and acted with reckless disregard of its truth knowing that the content of the statements and publications were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

7. In disseminating the information to the public defendants aforesaid acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

8. At all times relevant hereto defendants aforesaid knew that publishing the statements would create a false impression and damage plaintiff, Joseph Vicari. Defendants’ conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

9. The defamatory publications and statements made by defendants aforesaid injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendants, Vision Media and Paul Swibinski, jointly, severally and in the alternative for compensatory damages, punitive damages, attorney’s fees, filing fees, interest, cost of suit

and any other relief the Court deems just.

COUNT THIRTEEN

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014 defendants, Vision Media, Paul Swibinski and/or an agent working on Vision Media's behalf, published commercials that circulated via cable television, throughout Ocean County, New Jersey, and surrounding areas.

3. The commercials were created by defendants, Vision Media, Paul Swibinski and/or an agent working on its behalf.

4. In the commercials said defendants falsely states that plaintiff, Joseph Vicari of being dishonest, guilty of sexual harassment, secrecy, political patronage, intimidation, corruption, and fiscal irresponsibility.

5. The said publications further stated that plaintiff, Joseph Vicari was under criminal investigation by the Federal Bureau of Investigation ("FBI"), that plaintiff, Joseph Vicari would be "taken out in handcuffs" by the FBI and that "after 30 years in office, [Vicari] has turned into one of the greediest and most corrupt political bosses in New Jersey history".

6. At the time of publishing the statements the said defendants its agents, servants and employees responsible for the publication had actual knowledge that the content of the publications were false and acted with reckless disregard of its truth knowing that the content of the statements and publications were defamatory and false

and/or entertained serious doubt as to the truth of the statements in each of the letters.

7. In disseminating the information to the public defendants aforesaid acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

8. At all times relevant hereto defendants aforesaid knew that publishing the statements would create a false impression and damage plaintiff Joseph Vicari. Defendant's conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

9. The defamatory publications and statements made by the defendants aforesaid injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendants Vision Media and Paul Swibinski, jointly, severally and in the alternative for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT FOURTEEN

1. Throughout the election year of 2014, defendants John Does (1-100) and or ABC Corp (1-100) their agents, servants and employees published and distributed letters, flyers, mailers and newspapers, throughout Ocean County, New Jersey, and the surrounding areas.

2. In the said publications defendants aforesaid falsely accused plaintiff, Joseph Vicari of dishonesty, breaking state election laws, secret, sexual harassment, secrecy, political patronage, intimidation, corruption, and fiscal irresponsibility.

3. The said publications further stated that plaintiff, Joseph Vicari was under criminal investigation by the Federal Bureau of Investigation ("FBI"), that plaintiff, Joseph Vicari would be "taken out in handcuffs" by the FBI and that "after 30 years in office, [Vicari] has turned into one of the greediest and most corrupt political bosses in New Jersey history".

4. At the time of publishing the said statements defendants aforesaid, its agents, servants and employees responsible for the publication had actual knowledge that the content of the publications were false and acted with reckless disregard of its truth knowing that the content of the statements and publications were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

5. In disseminating the information to the public defendants aforesaid acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

6. At all times relevant hereto defendants knew that publishing the said publications would create a false impression and damage plaintiff, Joseph Vicari. Defendants' conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

7. The defamatory publications and statements made by the said fictitious defendants injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendants, JOHN DOES (1-100) and ABC Corp., (1-100) for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT FIFTEEN

1. Plaintiff, Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014 defendants, JOHN DOES (1-100) and ABC Corp., (1-100) and/or an agent working on their behalf created and published commercials that circulated via cable television and the internet throughout Ocean County, New Jersey, and surrounding areas.

3. The said commercials further stated that plaintiff, Joseph Vicari was under criminal investigation by the Federal Bureau of Investigation ("FBI"), that plaintiff, Joseph Vicari would be "taken out in handcuffs" by the FBI and that "after 30 years in office, [Vicari] has turned into one of the greediest and most corrupt political bosses in New Jersey history".

4. At the time of publishing the said commercials defendants aforesaid, its agents, servants and employees responsible for the publication had actual knowledge that

the content of the commercials were false and acted with reckless disregard of its truth knowing that the content of the commercials were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

5. In disseminating the information to the public defendants aforesaid acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

6. At all times relevant hereto defendants knew that publishing the said commercials would create a false impression and damage plaintiff, Joseph Vicari. Defendants' conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

8. The defamatory commercials and statements made by the said fictitious defendants injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendants, JOHN DOES (1-100) and ABC Corp., (1-100), for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

COUNT SIXTEEN

1. Joseph Vicari incorporates by reference the previous numbered paragraphs as though set forth fully herein.

2. Throughout the election year of 2014 defendants, JOHN DOES (1-100) and ABC Corp., (1-100), continually made statements that plaintiff, Joseph Vicari was under investigation by the FBI, that plaintiff, Joseph Vicari was one of the most corrupt political bosses in New Jersey, and that plaintiff, Joseph Vicari was one of the most greedy political bosses in New Jersey.

3. The false statements and publications by defendants, JOHN DOES (1-100) and ABC Corp., (1-100) were communicated to private individuals, editorial boards, and the general public with the purpose of disparaging and defaming plaintiff, Joseph Vicari.

4. The statements by defendants, JOHN DOES (1-100) and ABC Corp., (1-100)ABC Corp.'s were published in the numerous newspapers, that circulated throughout Ocean County, New Jersey, and surrounding areas.

5. At the time of the statements the said fictitious defendants knew that the content of their respective statements were slanderous, false and/or entertained serious doubt as to the truth of the statements

6. At the time of publishing the said statements the fictitious defendants, had actual knowledge that the content of the publications were false and acted with reckless disregard of its truth knowing that the content of the statements and publications were defamatory and false and/or entertained serious doubt as to the truth of the statements in each of the letters.

7. In disseminating the information to the public the fictitious defendants acted intentionally and or in a grossly irresponsible manner with reckless disregard of the truth and veracity ordinarily followed by responsible persons.

8. At all times relevant hereto the fictitious defendants knew that publishing the statements would create a false impression and damage plaintiff, Joseph Vicari. Defendant's conduct was malicious and was foreseeably likely to injure plaintiff, Joseph Vicari.

9. The defamatory publications and statements made by the fictitious defendant injured the reputation of plaintiff, Joseph Vicari, exposed plaintiff, Joseph Vicari to hatred, contempt and ridicule, caused plaintiff, Joseph Vicari to lose his good will and confidence of others.

WHEREFORE, plaintiff, Joseph Vicari, demands judgment against defendants, JOHN DOES (1-100) and ABC Corp., (1-100), for compensatory damages, punitive damages, attorney's fees, filing fees, interest, cost of suit and any other relief the Court deems just.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Michael J. Deem, Esq. is hereby designated a Trial Counsel of this matter.

DEMAND FOR TRIAL BY JURY

Plaintiff, Joseph Vicari, hereby demands a trial by jury.

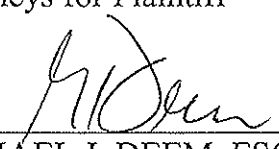
CERTIFICATION

I hereby certify that this matter is not the subject of any other action pending in any Court or a pending Arbitration proceeding, nor is any other action or Arbitration proceeding contemplated. All parties known to plaintiff at this time who should have

been joined in this action, have been joined.

R.C. SHEA & ASSOCIATES
Attorneys for Plaintiff

By: _____


MICHAEL J. DEEM, ESQ.

Date: November 21, 2014