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ANTHONY DEPROSPO, Plaintiff, v. COUNTY OF ESSEX, CHIEF OF DETECTIVES MITCHELL G. MCGUIRE III (IN HIS PROFESSIONAL AND PERSONAL CAPACITIES), LT JOHN CAMPO (IN HIS PROFESSIONAL AND PERSONAL CAPACITIES), JOHN DOES 1-10. Defendants.	Superior Court of New Jersey Law Division: Civil Part Essex County Docket No.: CIVIL ACTION COMPLAINT
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Plaintiff, Anthony DeProspro, complaining of Defendants County of Essex, Chief of Detectives Mitchell G. McGuire, and Captain John Campo, collectively referred to hereafter as "Defendants," states as follows:

PARTIES:

1. Plaintiff, Anthony DeProspro, is a person residing in New Jersey and at all times relevant was a resident of New Jersey and an employee of the County of Essex as defined by the New Jersey Conscientious Employee Protection Act.
2. Defendant County of Essex is the County Government of Essex County, New Jersey and at all relevant times an employer as defined under the New Jersey Conscientious Employee Protection Act.
3. Defendant Mitchell G. McGuire III was the Chief of Detectives Of the Essex County Prosecutor's Office at all times relevant to this complaint, and was the Plaintiff's supervisor as defined under the New Jersey Law Against Discrimination and the New Jersey Conscientious Employee Protection Act.

4. John Campo was a Captain of Detectives of the Essex County Prosecutor's Office, and at all times relevant to this complaint was the Plaintiff's supervisor as defined under the New Jersey Law Against Discrimination and the New Jersey Conscientious Employee Protection Act.
5. John Does 1-10 are fictitious designations for parties or entities holding liability to the Plaintiff in this matter for any causes of action herein, identities currently unknown.

JURISDICTION AND VENUE:

6. The amount in controversy satisfies the Court's jurisdictional requirements.
7. The State of New Jersey has subject matter and personal jurisdiction over this controversy.
8. Venue is proper in this Court, as Defendants are the County Government of Essex, and their employee and/or appointee therein, and maintain a primary place of business in the City of Newark, Essex County.

FACTS COMMON TO ALL CLAIMS:

9. The Plaintiff is a Detective working for the County of Essex in the office of the Essex County Prosecutor.
10. The Plaintiff has been employed by Essex County since January 2017.
11. The Plaintiff is a highly educated law enforcement officer with a Doctorate in education, an Educational Specialist degree, a Masters degree in human resources, and a Bachelor's degree in Political Science.
12. The Plaintiff has over 21 years of experience in law enforcement having worked as a detective and police officer.
13. The Plaintiff possesses a wide range of advanced law enforcement training including specialized investigative and instructional training.

14. In addition to his law enforcement career the Plaintiff is an adjunct college professor with a long history of outstanding educational and instructional experience.
15. The Plaintiff started his career with Defendant Essex in 2017, assigned to the Intelligence Unit collecting, processing, analyzing, and disseminating criminal intelligence data.
16. The Plaintiff was transferred to the Essex County Narcotics Task Force around a year after being hired by Defendant Essex.
17. At the Narcotics Task Force the Plaintiff worked on cooperative narcotics operations and investigations in concert with local, state, county, and federal partner agencies.
18. The Plaintiff's next assignment was to the Special Prosecutions Unit.
19. The Special Prosecution Unit is a subdivision of the Major Crimes Section of the Essex County Prosecutor's Office focusing primarily on shooting, carjacking, and intelligence-based investigations.
20. The Plaintiff was then assigned to the Forensics Analysis & Cyber Technical Services Unit, known as the "FACTS" unit.
21. The FACTS Unit works with local, state, and federal law enforcement agencies, and provides a valuable local resource given that many local police departments don't have the facilities and expertise to thoroughly investigate computer-related matters.
22. After completing his assignment to the FACTS Unit, the Plaintiff was assigned to the office of the Chief of Detectives, which would then fall under the Administrative Unit.
23. While at the Administrative Unit the Plaintiff administered the ECPO website and

social media, administered and conducted mandated police training, did presentations to external constituents such as high school/college students on internet safety, and utilized drone technology to record events and place the video recordings on ECPO social media accounts.

24. While assigned at the Chief's Office the Plaintiff was directly supervised directly by Defendant McGuire.
25. The Plaintiff was also active in the detective's union, Police Benevolent Association Local 325, beginning in 2020 when he was appointed as a Trustee of the local.
26. The Plaintiff also served as Recording Secretary and Financial Secretary of PBA 325 between 2021-2022.
27. In November 2022 the Plaintiff was appointed to complete the remaining term of the previous PBA President.
28. The Plaintiff was subsequently elected President of PBA 325 in June 2024.
29. In his positions as Trustee, Recording Secretary, and Financial Secretary, the Plaintiff provided union representation to members subject to internal affairs investigations.
30. In his position as Trustee, Recording Secretary, and Financial Secretary the Plaintiff participated in collective bargaining agreement negotiations with Defendant Essex.
31. During his time as Trustee, Recording Secretary, and Financial Secretary the Plaintiff was a union participant in the formal grievance process.
32. As President of PBA 325 the Plaintiff engaged in the organized labor actions discussed above, but in the role as President also became the outward facing representative of his PBA 325 constituents.
33. In his role as the President of PBA 325 the Plaintiff has the right to speak to the

public, including the media, on issues of public concern.

34. In his role as President of PBA 325 the Plaintiff was the direct conduit between the upper management of the ECPO, and his constituent Detectives.
35. As the President of PBA 325 the Plaintiff had both the right and responsibility to bring issues of concern of his members directly to upper management, including Defendant McGuire and the Essex County Prosecutor, Theodore N. Stephens II.
36. In his role as President of PBA 325 the Plaintiff has brought a variety of substantive issues to the attention of senior leadership of Defendants, primarily Defendant McGuire.
37. The issues the Plaintiff brought to the attention of Defendant McGuire include mundane issues of contract compliance, but also complaints of violation of the law.
38. The Plaintiff has frequently brought issues of discrimination to the attention of senior leadership of Defendants, including Defendant McGuire.
39. The New Jersey Law Against Discrimination makes employer retaliation against those advocating for a protected class illegal in the State of New Jersey.
40. The Conscientious Employee Protection Act makes it illegal for employers to retaliate against any employees who discloses, or threatens to disclose, to a supervisor or to a public body an activity, policy or practice of the employer, that the employee reasonably believes is in violation of a law, or a rule or regulation issued under the law.
41. The Plaintiff has been retaliated against for advocating for classes protected under the NJLAD.
42. The Plaintiff has been retaliated against for disclosing to superiors what he reasonably believed to be violations of a law, or a rule or regulation issued under

the law.

43. The Plaintiff experienced retaliation based on his advocacy as described above since at least 2020.
44. By way of background, the Plaintiff was often tasked with performing personal favors for Defendants' senior leadership.
45. On October 9, 2020, the Plaintiff sent Defendant McGuire a video of his daughter's soccer game, which the Plaintiff recorded and edited, with the use of personal equipment and time.
46. During the week of April 9, 2021, the Plaintiff created and presented a video for former Chief of Detectives Anthony Ambrose's after-hours retirement party.
47. On August 8, 2021, the Plaintiff was tasked with designing an image for the personal cornhole boards of Captain Randolph Root.
48. On July 15, 2021, the Plaintiff was tasked with designing an image for his Deputy Chief Jose Ramirez's daughter's graduation.
49. On April 4, 2022 Defendant McGuire had the Plaintiff research how to get Defendant McGuire out of PERS LE pension and into the Police and Fire Pension System; The State of New Jersey had deemed Defendant McGuire's job as not a law enforcement officer position.
50. On June 13, 2022, the Plaintiff was tasked with researching and writing for Deputy Chief Toni Ann Matia about School Resource Officers for her personal use related to her daughter's school.
51. On September 19, 2022, the Plaintiff was tasked with research and writing on the advantages of Class III police officers over private security for Deputy Chief Matia for her personal use for her daughter's school.
52. The Plaintiff had to do this on his personal time and Deputy Chief Matia stated

she was on her kid's school board, signaling to the Plaintiff this was related to non-ECPO business.

53. Former PBA 325 President Anthony Rua told the Plaintiff that one of his products may have also been used for a consulting business Deputy Chief Matia operated with former Chief of Detectives Anthony Ambrose's consulting business.
54. During 2020, the plaintiff was not allowed to work a modified A/B schedule consisting of alternating days or weeks during the COVID-19 outbreak, as most staff were permitted.
55. On July 23, 2020, during a food drive, Defendant McGuire asked the plaintiff to fly his personal drone to capture video footage.
56. The Plaintiff informed Defendant McGuire that they were in restricted airspace and that, at the time, he did not possess an FAA Part 107 license or insurance; In violation of FAA guidelines, Defendant McGuire responded to fly the drone, we need to have a lot of attorneys here to deal with it.
57. In September 2020 the Plaintiff and Detective Rua congratulated Detective Mora on his pending retirement.
58. Defendant McGuire walked up next to them and stated words to the effect of "you're lucky I'm letting you go." Defendant McGuire then asked the group a question, "Do you know how to keep a guy from leaving"? The Plaintiff replied, "Blackball them?" to which Defendant McGuire replied "no, putting nonsense IA charges on them."
59. On November 10, 2021, Defendant McGuire sent an image of his dog's testicles to the Plaintiff, and again to the Plaintiff on November 24, 2021.
60. In February 2022, Defendant McGuire stated the Plaintiff reminded him of the pornographic actor Ron Jeremy while another ECPO employee (Aide Michael

McGuire) was present.

61. In November 2022 the Plaintiff became the President of PBA 325 after having held prior union positions as Financial Secretary, Recording Secretary, and Trustee
62. On November 11, 2022, in his role as PBA President the Plaintiff posted a meme on the PBA 325 Facebook/Instagram page the definition of “nepotism” along with a short quote about nepotism.
63. On November 28, 2022, the Plaintiff advised Defendants he had obtained overtime records through the Open Public Records Act, and learned a senior leader of Defendants, LT DeGroot, was failing to pay detectives contractual overtime, instead changing their hours.
64. On November 29, 2022, the Plaintiff served LT DeGroot with a grievance regarding an overtime issue.
65. Shortly thereafter, Defendants moved Plaintiff's seating from a desirable window office to the opposite end of the office floor in a hidden corner.
66. The Plaintiff, a law enforcement officer, was seated adjacent to Kecia Richardson-Gilbert, the Steward for the non-law enforcement staff union.
67. The Plaintiff found this new work area to be loud and distracting.
68. Staff would congregate in front of the Plaintiff's desk area, as the evidence computer and copiers were directly in front of the work area.
69. The Plaintiff's union counterpart, Ms. Richardson-Gilbert repeatedly complained to supervisors about the seating arrangement, with negative results.
70. The Plaintiff was eventually moved months later after the ceiling collapsed over his work area.
71. Defendants relocated the Plaintiff to the center isle cube of the Adult Trial Unit, as the Plaintiff noted had been done to the prior PBA President Rua.

72. On December 12, 2022, the Plaintiff complained to Defendant McGuire that the Retirement Process appeared to be different for each detective, and also complained about labor law violations, specifically Detectives working without proper rest time.
73. Within hours of emailing his complaints to Defendant McGuire, the Plaintiff received an email from Captain Olmo directing the Plaintiff to write an Administrative Report¹ and “admin” stating his duties, projects, calendar, and attaching daily log sheets.
74. The email from CPT Olmo also added that in addition to unit tasks, the Plaintiff was now tasked with assisting the Court Squad.
75. The email from CPT Olmo also directed Plaintiff to submit his overtime requests through Deputy Chief Matia.
76. The Plaintiff has not been given any overtime since.
77. The Plaintiff’s chain of command was confusing.
78. The Plaintiff was shuffled by leaders with ATS, the Chief’s office and Special Projects/Administrative Services chains of command.
79. ATS is perceived by ECPO sworn staff as a punishment and correction unit.
80. ATS is tasked with a crushing workload, work that is time sensitive and urgent, but also characterized by Plaintiff as “make work,” inappropriate for detectives.
81. At ATS overtime is rare, staff must wear a suit, the office space consists of cramped cubicles in a busy aisle, all under the supervision of Captain Campo.
82. ATS is also a unit where new Detectives recently graduated from the police academy are placed, not seasoned detectives such as the Plaintiff.

¹ “Administrative Reports” are utilized by Defendants to memorialize minor performance issues in the workplace among other items, and appear to serve as an unofficial “demerit” system.

83. ATS is perceived by sworn staff as where “problem detectives” were placed, including Union leaders perceived as troublesome by Defendants, among them the Plaintiff.
84. Placement in ATS was starkly incongruent with the Plaintiff’s highly developed skills, knowledge, education, and abilities as a Detective.
85. In December of 2022 the Plaintiff brought several issues to the attention of ECPO leadership including violations of contractual provisions related to overtime, leaders requesting volunteer Detectives for work-related events, the retirement process, which resulted in grievances being filed on behalf of his union constituents.
86. Plaintiff had been assigned to work on social media accounts for Defendants.
87. This assignment necessitated a working relationship with Defendant’s Public Information Officer Robert Florida.
88. After bringing the union related issues to the attention of ECPO leadership, the Plaintiff was prohibited from direct contact with the PIO, with CPT Olmo directing that all communications with the PIO by the Plaintiff must come through him.
89. PIO Florida expressed to the Plaintiff that while on a recent video conference, First Assistant Alex Albu commented that nothing is awarded (to ECPO employees) by merit, to which Defendant McGuire and Prosecutor Stephens responded with laughter.
90. After bringing the union related issues to the attention of ECPO leadership, the Plaintiff was purposely “double booked” for duties, in one instance being assigned to teach a course at the County Jail, but also across town at a different location.

91. On December 20, 2022, the Plaintiff was assigned to qualifications at the firing range.
92. While on the way home from the firing range the Plaintiff received a call from Defendant McGuire's secretary instructing him to report to the Chief's office.
93. The Plaintiff was later told to disregard these instructions and report to Defendant McGuire's office the following day at 9am, because the Plaintiff would earn overtime if he did return.
94. The Plaintiff asked if the meeting was about union business and no reply was provided except reiteration that the Plaintiff needed to be there as Defendant McGuire directed.
95. The Plaintiff appeared as directed at 9am the following day, however in a blatant show of disrespect, Defendant McGuire was an hour late to the meeting.
96. Defendant McGuire verbally reprimanded the Plaintiff, asserting that because the Plaintiff is a detective, he needs to appear when summoned by the Chief, no matter where he is or what he is doing.
97. Defendant McGuire also falsely claimed the Plaintiff was disrespectful to the secretary, a complete falsehood.
98. Defendant McGuire then provided the Plaintiff with a denied grievance; the Plaintiff was called into the office to waste his time, simply to be handed a denied grievance.
99. The Plaintiff notes that as President of the union he has the right to refuse or reschedule union related meetings with Defendants and believes this is why the nature of the meeting was not made clear by Defendant McGuire.
100. On December 21, 2022, the Plaintiff served the Prosecutor with a grievance related to shift changes, the "five-day rule," mandating any shift changes will be

noticed to the affected Detectives at least five days prior to the change.

101. Then on the same day the Plaintiff was required by LT David Fontoura to provide an Administrative Report detailing the usernames and passwords for all ECPO social media accounts he managed.
102. The Plaintiff was also advised by PIO Florida that Deputy Chief Mattia was demanding an explanation of conversations between him and the Plaintiff after each time she noticed them speaking together.
103. In January of 2023 the Plaintiff noted he was purposely overburdened with work, covering ATS work, assisting other units, and covering the Administrative Services Unit work as well.
104. On February 23, 2023, the Plaintiff served the ECPO with a pay increase grievance on behalf of his constituents.
105. Between February 23 - March 8, 2023, the Plaintiff disputed Defendant McGuire's denial of a union board member's attendance at a PBA event.
106. The dispute was resolved when the Plaintiff pointed out that Defendant McGuire's denial may represent a violation of New Jersey labor law.
107. In March 2023, CPT Campo advised Detective Elias Statham that he should not partner up with the Plaintiff, as this would draw negative, unwanted attention making DET Statham a target by the administration.
108. On March 3, 2023, the Plaintiff sent notice to Eapen Mathen in Payroll that newly hired Detectives receive appropriate hourly wages; the emailed notice was forwarded to Defendant McGuire by Mathen.
109. On May 16, 2023, the Plaintiff participated in arbitration for the shift-change grievance.
110. On June 23, 2023, the Plaintiff's work unit, the Administrative Service Unit was

disbanded by Defendant McGuire; the Plaintiff was the only Detective assigned to the unit.

111. This left the Plaintiff unofficially assigned to ATS while remaining responsible for work formerly handled under the Administrative Services Unit.
112. Defendants had taken similar action against the first past PBA President Rua, disbanding the unit he was assigned to and reassigning him to ATS.
113. Defendants disbanded the unit of past PBA President Antonio Rua and re-assigned him to ATS.
114. Similar adverse employment action was taken towards another past PBA President Chris DiRocco, re-assigning him from a heavily overtime-oriented unit to a unit with rare opportunities for overtime.
115. The past two union presidents before the Plaintiff have also filed civil suits against Defendant Essex for retaliation.²
116. On June 27, 2023, the Plaintiff in his role as PBA President spoke at a Essex County Commissioners meeting about poor pay, nepotism and other problems at the ECPO.
117. On July 9, 2023, around two weeks after the Commissioners' meeting, the Plaintiff's assigned ECPO vehicle was taken away by the Defendants.
118. Although the Administrative Service Unit had been officially disbanded, Defendants continued to assign Plaintiff work he formerly performed as part of the Administrative Services Unit.
119. As part of his duties at the Administrative Services Unit the Plaintiff was responsible for the ECPO social media, website, video documentation, and

² HUD-L-003781-19 DiRocco v Essex settled in 2022, ESX-L-007075-22 Antonio Rua v Essex, ongoing.

drones.

120. When the Plaintiff's vehicle was taken, he attempted to turn in all gear related to his Administrative Services Unit role, however Defendant McGuire resisted, stating the Plaintiff was still responsible for these duties.
121. Meanwhile within a space of days the Plaintiff's caseload went from 28 cases to over 40 cases; work was being piled on him mercilessly.
122. The Plaintiff's vehicle privilege had been removed, his unit was disbanded, but he was given more work, all the while being held accountable for the duties of his former role.
123. On July 10, 2023, a Temporary Transfer memo from Defendant McGuire formalized the Plaintiff's transfer to ATS.
124. On July 14, 2023 the Plaintiff notified Defendant McGuire that a retired detective had yet to receive her retirement credentials and asked that the ECPO take care of the issue as soon as possible.
125. On August 1, 2023, the Plaintiff met with Defendant McGuire to discuss a constituent's sick leave issues.
126. By August 2, 2023, the Plaintiff's work area had deteriorated to the point the ceiling was crumbling and leaking an unknown liquid, resulting in debris and fluids.
127. On the evening of August 2, 2023, the Plaintiff spoke out at an Essex County Commissioners meeting in his role as PBA President about unsafe work conditions and the possibility of asbestos hazard from the open ceiling tiles.
128. On August 4, 2023, the Plaintiff filed an OSHA complaint regarding possible asbestos contamination in the workplace.
129. Defendant McGuire sent out an email to ECPO staff on August 4, 2023, advising

the 3rd floor of the ECPO office will be closed until August 7, 2023, for asbestos removal.

130. On August 10, 2023, the Plaintiff followed up on the matter of the constituent who did not receive retirement credentials as the matter had yet to be resolved.
131. On September 6, 2023, the Plaintiff made a post to the PBA social media referencing poor pay and benefits at the ECPO.
132. On September 14, 2023 the Plaintiff met with Defendant McGuire to discuss incorrect application of the ECPO educational stipend.
133. During the week of September 17, 2023, the Plaintiff was away on authorized PBA business, yet Defendant Campo continued to assign the Plaintiff new cases, while aware the Plaintiff would not have time to work on them before returning from union business.
134. On September 27, 2023, the Plaintiff complained directly to Defendant McGuire that bereavement leave had been inappropriately administered by the ECPO to a PBA member.
135. On or about October 18, 2023, while the Plaintiff was on utilizing leave under the FMLA, Defendant Campo began leaving stacks of evidence on the seat and desk of the Plaintiff.
136. Entry of this evidence was make-work assigned by Defendant Campo to harass the Plaintiff, as this work is typically done by aides and clerical staff, and not a Detective's function.
137. On October 26, 2023, the Plaintiff posted on PBA social media about a contract dispute with Defendant Essex, including the official contact information for Commissioners that handle public safety matters.
138. On October 26, 2023, the Plaintiff posted to social media photographic evidence

of poor physical conditions at the ECPO workplace.

139. On or about October 27, 2023, it came to the Plaintiff's attention the ECPO was utilizing Detectives for manual labor, specifically to relocate boxes of files from storage to a new warehouse location.
140. The Plaintiff contacted CPT Olmo and advised Olmo that manual warehouse labor was outside of the scope of employment of Detectives, however Olmo feigned no knowledge of this although Olmo was the ECPO supervisor who sent out the email detailing the manual labor duties.
141. On October 31, 2023, the Plaintiff posted to PBA social media video evidence of Detectives engaged in out of title work, utilized to conduct manual labor of moving boxes of files.
142. On November 1, 2023, the Plaintiff voiced his concerns at an Essex County Commissioners meeting about the low pay, resignations, and poor work environment at the ECPO.
143. After the meeting it came to the Plaintiff's attention that Defendant McGuire had contacted members of the PBA executive board seeking inside information on the issues complained of by the Plaintiff.
144. The Plaintiff communicated to Defendant McGuire and to Prosecutor Stephens advising both to cease improperly meddling in union affairs.
145. On November 14, 2023, the Plaintiff posted a video to PBA social media critical of Essex County Commissioner Joseph "Joe D." DiVincenzo, pointing out Joe D's penchant for not settling labor contracts, wasting money, with retention issues resulting for Defendant Essex.
146. On December 6, 2023, the Plaintiff voiced concerns at an Essex County Commissioners meeting, advising his observation that there was a need for

oversight and transparency at the ECPO, that law enforcement staff were mismanaged despite 2-1 management ratio, and that nepotism was rampant in the ranks.

147. The Plaintiff suggested the issues at the ECPO were so severe and pervasive that the New Jersey Attorney General or United States Attorney should supersede leadership and take control of the ECPO.
148. On December 8, 2023, the Plaintiff met with DC Mattia regarding out of title work and advised Mattia that any work done outside of the scope of Detective duties required the payment of overtime.
149. On December 11, 2023, DC Mattia met with the Plaintiff and advised him the file move needed to be done, and if Detectives could perform the moving duties on overtime.
150. The Plaintiff advised DC Mattia that the duties could be performed overtime only outside of Detectives assigned work shifts.
151. DC Mattia concurred with the Plaintiff and said she would send out an overtime request to the affected ECPO sworn staff.
152. Despite DC Mattia's assertion that the work would be put out for overtime, the Plaintiff continued to receive complaints from numerous Detectives that they were being assigned moving duties outside the scope of their employment.
153. On December 14, 2023, the Plaintiff received notice from Defendant Campo that the Plaintiff's job responsibilities would continue to include doing the ECPO social media and assisting the PIO, in addition to the Plaintiff's ever-increasing workload at ATS.
154. On December 18, 2023, the Plaintiff filed a complaint with New Jersey Public Employees Occupational Safety and Health (PEOSH) regarding the work

conditions for Detectives assigned manual labor duties of moving boxes.

155. The Plaintiff detailed in his complaint dirty and dangerous conditions, including Detectives lifting heavy items including safes, discarding debris into open dumpsters, heat in the workspace of over 90 degrees, hot, and dusty, with Detectives provided no Personal Protective Equipment, water, or supervision at the Veterans Court House site.
156. On December 19, 2023, the Plaintiff served Defendant Campo with a Grievance regarding the box moving detail.
157. On December 19, 2023, the Plaintiff filed a complaint with the New Jersey Attorney General, Division of Criminal Justice, describing the practice of Defendant McGuire mandating employee attendance at sales pitches by private companies.
158. On December 19, 2023, the Plaintiff was presenting at NJIT for 500 students at an annual youth conference he had presented at for years.
159. Halfway through his presentation, the Plaintiff observed a ECPO FACTS unit Detective approaching him and called for a break
160. The FACTS Detective approached the Plaintiff and advised he was ordered by captain David Sanabria to take over the presentation and the Plaintiff must return to the ECPO.
161. The FACTS Detective explained he had protested to his supervisor that he was not prepared to give the presentation, as he had no training, materials, skill set, or ability regarding presentation to the public, but Defendants ordered him there anyway.
162. The Plaintiff presented at the youth conference since 2018; six years.
163. In contrast to FACTS Detective, the Plaintiff instructs professionally at two

colleges, and possesses extensive training, is certified by the New Jersey Police Training Commission in Methods Of Instruction, certification and is experienced in composing educational presentations.

164. The Plaintiff was removed from instruction for the dubious purpose of attending a sales pitch for a private health provider made mandatory by Defendants McGuire and Campo.
165. The Plaintiff was made to return to the ECPO and forego instruction on direct orders of Defendant Campo; attending Defendant McGuire's sales-pitch was more important than the youth of Essex County.
166. On December 21, 2023, PEOSH inspected the Defendants' ECPO workplace based on the Plaintiff's complaint.
167. On December 28, 2023, the Plaintiff communicated with Defendant McGuire by email about McGuire's abuse of power.
168. Specifically, Defendant McGuire abused his power by assigning Detectives to attend sales pitches from private companies selling products such as life insurance.
169. The Plaintiff noted deceptive marketing was utilized to mask the nature of the events by misnaming them with titles such as a "resiliency seminar."
170. The Plaintiff pointed out to Defendant McGuire that these are not voluntary, and Detectives are required to complete a sign-in sheet verifying attendance.
171. The Plaintiff advised Defendant McGuire such actions are gross overreach of his powers as Chief and must end.
172. On January 2, 2024, the Plaintiff submitted a Grievance protesting the box-moving detail to Defendant McGuire.
173. On January 4, 2024, the Plaintiff again voiced opposition to Defendant McGuire

and Prosecutor Stephens the ongoing box-moving detail utilizing Detectives to conduct manual labor in a dirty, dingy warehouse; a misuse of highly skilled law enforcement officers to conduct manual labor.

174. On January 8, 2024, the Plaintiff responded to Defendant McGuire's memo regarding the box detail Grievance and also sent another email to Defendant McGuire protesting the use of law enforcement staff to conduct out-of-title manual labor.
175. On January 9, 2024, the Plaintiff served Prosecutor Stephens with a grievance protesting the moving detail.
176. As President of PBA 325 the Plaintiff has the right to communicate with the media regarding issues of concern to his constituents.
177. In his role as PBA President the Plaintiff communicated with the media regarding the ongoing egregious waste of manpower represented by trained law enforcement officers being used to move boxes, rather than solve crime.
178. On January 10, 2024, NBC 4 aired an I-Team report detailing the labor complaints of ECPO Detectives regarding the so-called "Belleville Project."
179. The Plaintiff appeared in the I-Team news piece and voiced the concerns of his constituents regarding the out-of-title work being performed by Detectives.
180. The I-Team news piece was highly critical of Defendant McGuire and the ECPO leadership generally, excoriating them for the obvious fraud, waste and abuse of utilizing prosecutor's detectives to perform warehouse work.
181. On January 11, 2024, the Plaintiff filed a complaint against Defendants Essex and McGuire asserting confidential/sensitive -Essex County Prosecutors documents were being stored in the unsecured basement of Veterans Court House, accessible to anyone who chose to enter the unsecured location.

182. On January 23, 2024, Defendant Campo reprimanded the Plaintiff for violating unwritten “policies” Defendant Campo had devised only to apply to the Plaintiff, the PBA President.
183. When the Plaintiff requested Defendant Campo produce the “policies” in writing, Defendant Campo replied sarcastically that the policies were “verbal” and that he was advising the Plaintiff verbally now of the policies.
184. Defendant Campo later emailed his spurious policy to all via a “reminder” email to cover for his unprofessional and retaliatory conduct towards the Plaintiff.
185. On January 29, 2024, the Plaintiff communicated to Defendants’ Human Resources Department and the Executive Assistant Prosecutor that the ECPO was following outdated Center for Disease Control guidelines.
186. The Plaintiff emphasized it was important that the Defendant observed the CDC guidelines as the County received funding from the State and Federal government for their compliance with the CDC guidelines.
187. On February 2, 2024, the Plaintiff complained to Defendant McGuire and Prosecutor Stephens that the ECPO was failing to pay Detectives for on-call duties.
188. The Plaintiff was compelled to address the unresolved issue of failure to pay for on-call duties in a February 9, 2024, email to Defendant McGuire, DC Mattia, and Prosecutor Stephens.
189. On March 7, 2024, the Plaintiff represented the PBA in arbitration related to a shift-change grievance.
190. On March 15, 2024, the Plaintiff filed an Unfair Labor Practices complaint and grievance as detectives working on-call for the extradition unit were not being compensated for standby time; The detectives were only being paid, should they

receive a job.

191. On March 18, 2024, a Civil Service Audit was conducted at the ECPO and Detective Aides were instructed to explain their daily activities in writing.
192. The Plaintiff noted he was not being offered overtime, in one March 2024 instance DC Mattia asked Detectives if they wanted overtime for a Narcotics detail, even asking a Detective sitting directly behind the Plaintiff, but not asking the Plaintiff himself.
193. On or about March 22, 2024, Defendant McGuire was present when Anthony Ambrose was injured by a negligent firearms discharge.
194. Ambrose is a former Newark police officer, former ECPO Chief of Detectives, and former Newark Public Safety Director.
195. Ambrose owns and operates Ambrose Group LLC, a law enforcement consulting firm with lucrative contracts with Essex County municipalities, past clients include Defendant Essex as well.
196. On March 25, 2024, the Plaintiff filed a complaint with the New Jersey Attorney General, Division of Criminal Justice, in reference to Defendant McGuire's role in the negligent discharge incident.
197. On March 28, 2024, at approximately 10:20 A.M. the Plaintiff was in the workplace speaking to a PBA Trustee, Quince Jones, overheard by Defendant Campo.
198. The Plaintiff briefly left his work area to utilize the restroom and upon return found a new stack of busy work left for him by Defendant Campo.
199. On April 12, 2024, at approximately 9:00 A.M. Defendant Campo advised the Plaintiff he had searched the Plaintiff's desk drawers and found evidence which the Plaintiff had yet to enter.

200. Defendant Campo directed the Plaintiff to enter more than two or three items a day, on top of the other work assigned to the Plaintiff.
201. Defendant Campo was aware the Plaintiff was the PBA President.
202. Defendant Campo knew or should have known that by searching the Plaintiff's desk drawers he would observe PBA documents and communications he was not privileged or authorized to handle.
203. About five minutes later Defendant Campo summoned the Plaintiff to his office and told the Plaintiff that his work volume was unacceptable and from this point on the Plaintiff's only duty would be entering evidence.
204. The Plaintiff's duties thereafter largely consisted of entering "evidence" amounting to copies of copies, busy work with no substance.
205. Since there is only one computer in which evidence may be entered, the Plaintiff spends time waiting for others to complete their business before doing his.
206. The Plaintiff perceived the actions of Defendant Campo were retaliatory in nature for the Plaintiff utilizing FMLA.
207. Defendant Campo would harass the Plaintiff immediately following FMLA leave days.
208. The Plaintiff would explain to Defendant Campo that FMLA days are his right and will be utilized as needed within policy, procedure, rules and regulations governing FMLA.
209. Defendant Campo retaliated by demanding the Plaintiff enter the FMLA days into the time and attendance system immediately upon using them.
210. This practice of Defendant Campo did not align with the policy and procedure of Defendant Essex.
211. This is an example of a retaliatory rule devised by Defendant Campo that apply

only to the Plaintiff, President of the PBA.

212. Defendant Campo demanded the Plaintiff call his Sergeant when he will be out in the morning instead of a text, email, or just entering it into the system.
213. Defendants' policy states employees will make a notification, it does not specify what type of notification this will be, and the phone call rule applied only to the Plaintiff.
214. Defendant Campo also had the Plaintiff do reception work at the front desk.
215. Defendant Campo frequently assigned the Plaintiff, a seasoned Detective, to work as a receptionist at the reception desk all afternoon.
216. Reception is not a law enforcement function, but Defendant Campo utilized the Plaintiff in this manner anyway.
217. On May 1, 2024, while the Plaintiff was out on FMLA, Defendant Campo sent the New Jersey State Police to the Plaintiff's residence to do a "welfare check" on the Plaintiff.
218. When the Plaintiff asked the State Police who sent them, they explained the ECPO had requested the welfare check claiming the Plaintiff did not show up to work.
219. The Plaintiff was out on FMLA, utilizing leave days, attending to the serious medical needs of a family member.
220. The Plaintiff had followed Defendant Campo instructions to provide notice each day he would be out directly to Defendant Campo.
221. The "welfare check" was purely an act of harassment and retaliation by Defendant Campo who could have called, texted, or emailed the Plaintiff to the same effect.
222. Instead, Defendant Campo summoned law enforcement to disturb the Plaintiff at his residence, while on FMLA caring for a family member.
223. Adding to the retaliatory nature of this incident, Defendant Campo ordered the

Plaintiff to complete an Administrative Report about the circumstances of his leave day.

224. There is no reasonable explanation for Defendant Campo's actions other than retaliatory intent.
225. During the week of June 12, 2024, Defendant Campo informed DET Statham that ECPO Detectives would face negative consequences, "getting what they deserve" by voting in the Plaintiff as their PBA President.
226. On June 19, 2024, the Plaintiff began to receive complaints from Detectives regarding the services provided by Complete Diagnostic & Medical Services of New Jersey, one of the companies Detectives were compelled to attend a sales pitch on.
227. Plaintiff complained to Defendants on behalf of his constituents that Defendants were violating the law by not allowing Detectives to take FMLA in hourly blocks if necessary.
228. On July 5, 2024, the Plaintiff was removed as a presenter for Defendants' Internship program.
229. The Plaintiff had presented at each Internship program prior for several years, at the specific request of Essex County community relations specialist Nichole Graves Watson.
230. This established a pattern of retaliation, excluding the Plaintiff from participating in community relations since being removed from the NJIT youth conference presentation in December of 2023 by Defendant McGuire.
231. On July 12, 2024, the Civil Service Desk Audit results were distributed to the Defendants.
232. The Plaintiff sent a ballistics report to the Evidence Unit only to be ignored on

July 11, July 29, and August 2, 2024; the Ballistics Unit were among the subjects of the Civil Service Desk Audit and expressed displeasure with the Plaintiff by ignoring his requests.

233. On July 19, 2024, Prosecutor's Agent Michael Bramhall sent the Plaintiff a request for the PBA to subsidize Defendants' internship program.
234. The Plaintiff denied this request as it would be improper for the PBA to subsidize a program of the County.
235. On July 19, 24 the Plaintiff complained to Defendants' leadership about payroll issues.
236. On July 23, 2024, Community Relations Specialist Graves-Watson confided in the Plaintiff that she had requested he speak at events multiple times and asked why the Plaintiff no longer participated.
237. Defendants had not communicated to the Plaintiff about these requests; he was being purposely excluded after years of successful participation in community events.
238. On July 23, 2024, the Plaintiff filed for Arbitration, specifically to initiate Compulsory Interest Arbitration on the union's outstanding contract.
239. On July 30, 2024, the Plaintiff emailed Defendant McGuire and Prosecutor Stephens about payroll issues.
240. Despite the Plaintiff being the Union President and having the right and obligation to communicate directly with Prosecutor Stephens, Stephens emailed the Plaintiff directing him to utilize the chain of command for union issues and not to contact him directly.
241. On August 1, 2024, the Plaintiff was assigned to hand out Megan's Law flyers, the only Detective selected to do so out of the 24 personnel assigned to his work unit.

242. On August 15, 2024, Essex County Counsel Jerome St John contacted the Plaintiff on Plaintiff's personal cell phone and requested the Plaintiff remove vehicle information the Plaintiff had obtained via OPRA from the Union bulletin board; the Plaintiff declined to do so.
243. On September 3, 2024, the Plaintiff complained to Defendant McGuire that a union official had been improperly denied access to a labor convention, noting that the official had the right to attend under the law.
244. On September 16, 2024, the Plaintiff emailed Defendant McGuire about a pay issue related to one of Plaintiff's constituents.
245. On September 20, 2024, the Plaintiff emailed Defendants' Director of Human Resources, Jacqueline "Jackie" Jones, complaining that Detective Jason Gorto remained under the supervision of Defendant Campo despite complaints of retaliation.
246. The Plaintiff further expressed concern to Jones that Defendants refuse to assign subordinates from those the subordinates have accused of retaliation, discrimination and harassment in violation of the law.
247. On September 20, 2024, the Plaintiff again complained to Defendants payroll contact, Eapen Mathen, about persistent payroll problems.
248. Mathen advised the Plaintiff that the problem does not lie with Payroll but originates at the ECPO.
249. On September 23, 2024, Defendant McGuire subjected the Plaintiff to a bizarre, retaliatory staged confrontation in the workplace.
250. The Plaintiff had written and emailed Lorenda Grier, Defendant McGuire's secretary, to give leadership a courtesy notification that a Detective would be submitting an Administrative Report, and submitting documentation related to

pending medical leave.

251. After receiving the email, Greier came to the Plaintiff's work area and asked why he emailed about the issue.
252. The Plaintiff explained the communication was meant to provide courtesy notification, and to document the Detective's situation.
253. Grier then requested the Plaintiff see her in her office.
254. Once there, the Plaintiff explained he understands there is a formal process for submitting such notice, a "Chief's Memo," however as PBA President he wanted to provide the courtesy of notice.
255. Defendant McGuire walked out of his adjacent office, entered the conversation, and started arguing with the Plaintiff.
256. Next, Pamela Kearny from Human Resources came into the office as well, followed by Eapen Mathen, finally both Deputy Chiefs entered too.
257. The Plaintiff noted various facts, such as Kearny and Mathen's offices being on the other side of the building, and the quick appearance of the Chief and his deputies, that this was a staged confrontation.
258. The Plaintiff found himself sitting in a chair while Defendant McGuire and his staff were all standing over him.
259. Defendant McGuire's behavior quickly escalated to unreasonable anger and hostility, including use of profanity towards the Plaintiff, that DC Mattia was compelled to intervene and direct the Plaintiff out of the room.
260. DC Mattia walked the Plaintiff back to his desk and stated it was getting too heated, and that the Plaintiff should "grab some air."
261. On September 26, 2024, the Plaintiff contacted Defendant McGuire, Kearny, and Grier requesting an explanation for Detective Aileen Clowes being docked a day of

pay.

262. Defendant McGuire and the others refused to provide an explanation for Detective Clowes, a union constituent of the Plaintiff, docked a day of pay.
263. On October 3, 2024, Defendant Campo convened a morning meeting of the ATS unit about Detectives going to each other's cubicles to talk.
264. Defendant Campo asserted the issue had been raised by the “administration” which by inference refers to Defendant McGuire, who claimed unit members talking to each other in the workplace meant they don’t have enough work to do.
265. The Plaintiff disputed Defendants' claim, stating to Defendant Campo that the Unit indisputably has an abundance of work, and for the administration to claim otherwise is incorrect.
266. The Plaintiff suggested to Defendant Campo that perhaps there is some confusion as to what is acceptable and what is not, as Defendant Campo himself comes to certain Detective’s desks engaging in lengthy communications about non-work topics such as professional sports.
267. This spurious assertion the unit did not have enough work was a childish retaliatory action by Defendant McGuire based on the Plaintiff's PBA President duties.
268. DC Mattia had witnessed the Plaintiff discussing union business with a constituent in reference to pending mediation.
269. The Plaintiff obtained a copy of an Administrative Report completed by CPT Olmo, memorializing the Plaintiff's meeting with his Detective constituent.
270. Defendants engaged in improperly surveilling and reporting on the Plaintiff's union activities, then took retaliatory action against the Plaintiff and other Detectives.

271. On January 1, 2025, the Plaintiff filed an OPRA request with Defendant Essex seeking Detective salaries, overtime, and names and job titles/descriptions of ECPO employees.
272. On January 2, 2025, the Plaintiff emailed complaints regarding Payroll, reimbursement, processing area, and vehicle storage to Defendant McGuire, Prosecutor Stephens, and First Assistant Prosecutor Alexander Albu.
273. The processing area refers to the area of the ECPO in which persons taken into custody are processed, fingerprinted, photographed, searched, and detained while paperwork and other administrative functions are completed by Detectives.
274. The processing area was surrounded by civilian employee work areas, with easy access to exits from the building, with inappropriate adjacent areas such as a kitchenette, common bathrooms.
275. The processing area also had an old courtroom bench placed in a busy hallway which subjects were handcuffed to, with doors that did not lock from within.
276. The ECPO is arguably the busiest prosecutor's law enforcement operation in the state of New Jersey, however despite numerous complaints by the Plaintiff in his role as PBA President, the processing area had been operating in an unsafe, unprofessional ad hoc manner for ten years.
277. On or about January 2025 the Plaintiff received reports of senior leadership of the ECPO carrying unauthorized personal firearms while on duty in the workplace.
278. The Plaintiff personally observed Defendant McGuire carrying a .45 caliber Colt 1911 style handgun in the workplace.
279. The Colt 1911 is a handgun design dating back over 100 years and rarely utilized by law enforcement officers outside of highly specialized units such as SWAT.
280. American law enforcement agencies overwhelmingly mandate modern double

action only pistols with present day safety and operational advantages the venerable 1911 design lacks.

281. The presence of what appeared to be unauthorized weapons in the workplace concerned the Plaintiff deeply as a safety issue, as well as an issue of “do as I say, not as I do.”
282. Concerned about the weapons issue, the Plaintiff filed an OPRA request for the ECPO weapons policies which were denied.
- 283.
284. On January 9, 2025, the Plaintiff filed a complaint with the New Jersey Attorney General's Office regarding unsafe conditions in the ECPO processing area.
285. On January 10, 2025, the Plaintiff filed a complaint with New Jersey Public Employees Occupational Safety and Health related to unsafe conditions in the ECPO processing area.
286. On January 13, 2025, the Plaintiff contacted the Criminal Justice Information System Control Unit and complained regarding violations of the policy, procedure and law related to system administration at the ECPO.
287. The Plaintiff, a certified Terminal Access Control officer, and the formal Terminal Access Coordinator for the New Jersey Transit Police had an objectively reasonable belief that the Defendants were violating CJIS policy, regulations and ultimately, the law.
288. On January 16, 2025, the Plaintiff filed a complaint with the New Jersey Comptroller Office of Inspector General requesting a review of all outstanding civil lawsuits against the Defendants and directed the Controller to recent news items regarding the suits; the Plaintiff received no response.
289. As of January 17, 2025, the Plaintiff continued to be inundated with retaliatory

busy-work designed to punish him for his whistle blowing.

290. After receiving a report of Defendant McGuire, CPT Olmo and a Lieutenant consuming alcohol on-duty at the ECPO, the Plaintiff filed an OPRA request for Defendants' policy on consumption of alcohol in the workplace.
291. On January 31, 2025, the Plaintiff sent a letter to Mathen, Defendant McGuire, and Administrator Robert Jackson about Defendants' failure to pay Detectives a contractual 2025 pay increase.
292. In March, 2025, Defendant Campo stated to DET Statham, that all ECPO office seating assignments are deliberate and purposeful.
293. On February 5, 2025, the Plaintiff filed a complaint with the New Jersey Attorney General's Office regarding Defendants' Professional Standards Bureau ("IA") failing to provide notice the PBA of Detectives becoming the target of internal affairs investigations.
294. IA was simply copying the Plaintiff on target emails rather than providing formal notice as required by the law.
295. The Plaintiff specifically complained the Defendants were violating NJSA 40A:14-181.
296. On February 5, 2025, one of the Plaintiff's union constituents reported to him that Defendant McGuire had expressed he was upset by the Plaintiff posting the agency overtime records obtained through OPRA on the PBA website.
297. On February 6, 2025, the Plaintiff emailed Defendant McGuire, Prosecutor Stephens, Frist Assistant Albu, IA leadership and others complaining of Defendants failing to notify the PBA of Detectives becoming IA targets.
298. On February 10, 2025, the Plaintiff communicated a demand to Defendant McGuire, Prosecutor Stephens, , HR director Jackie Jones, and County Counsel

Sylvia Hall that IA be re-trained on property policy, procedures and laws related to internal investigations.

299. On February 14, 2025, the Plaintiff exercised his right and obligation as President of the PBA to communicate by email directly with Prosecutor Stephens to report issues of payroll problems, and an unfair labor practice complaint.
300. Prosecutor Stephens came to the Plaintiff's workspace and asked if the Plaintiff had received his prior email directing him to use the chain of command for union business, and reiterating the Plaintiff needs to use the chain of command for union issues.
301. The Plaintiff reminded Prosecutor Stephens that for union issues, there is no obligation to use the chain of command, and that he includes Stephens in the emails so that Stephens may be held accountable.
302. Stephens replied by essentially restarting his "request" that the Plaintiff use the chain of command.
303. On February 21, 2025, additional detectives were transferred out of the Plaintiff's unit, the ATS unit.
304. As Detectives are transferred out of the ATS the workload on the Plaintiff increases commensurately, to the point the Plaintiff is overwhelmed with over 100 cases.
305. The remaining personnel were those placed in ATS as a punishment, where they were overburdened with work.
306. In April 2025, Defendant Campo requested that DET Statham, the PBA financial secretary, disclose to him the Union's available funds; DET Statham refused.
307. During the week of April 2, 2025. DET Jason Gorto overheard Defendant Campo complaining about DET Ryan Scanlon's possible use of FMLA, stating that

Detectives need to do their job, and that DET Scanlon is not dedicated.

308. In the past, CPT Campo stated his displeasure of DET Llyod Martin taking FMLA, by stating he himself would never take FMLA because he is not a woman.
309. On April 3, 2025, the Plaintiff filed a complaint with Human Resources e complaining of bias-based harassment, discrimination, retaliation and hostile work environment created by the workplace behavior of Defendant Campo.
310. On April 8, 2025, the Plaintiff filed a complaint on behalf of PBA 325 to the United States Department of Justice, Civil Rights Division complaining of bias-based harassment, discrimination, retaliation and hostile work environment created by the behavior of Defendant Campo.
311. On April 9, 2025, the Plaintiff filed a complaint on behalf of PBA 325 with the New Jersey Attorney General Office, regarding the behavior of Defendant Campo.
312. On April 9, 2025, the Plaintiff filed a complaint on behalf of PBA 325 with the New Jersey Attorney General's Office, Division of Civil Rights regarding bias-based discrimination, harassment and hostile work environment created for his members, particularly minorities and women in the workplace by the behavior of Defendant Campo.
313. On April 9, 2025, the Plaintiff filed an OPRA request with Defendant Essex seeking an absence report, Detective payroll records, and drug testing policies.
314. On April 15, 2025, the Plaintiff filed a complaint with Civil Service against Defendant Essex on behalf of PBA 325.
315. On April 25, 2025, the Plaintiff filed an OPRA request with Defendant Essex for overtime records for sworn law enforcement staff.
316. On April 30, 2025, the Plaintiff met with the Inspector General in reference to Defendant Campo specifically about complaints of harassment and intimidation

reported by detectives.

317. On May 2, 2025, the Plaintiff attempted to correct a pay error though Kearney and Kearney failed to respond, the Plaintiff did receive the courtesy of a reply but was eventually paid.
318. On May 5, 2025, the Plaintiff complained to IA Director Jessica Levinson of deviation from Attorney General guidelines regarding drug testing and but did not receive a substantive response.
319. On May 30, 2025 Defendants failed to implement an agreement for road jobs which would have provided the Plaintiff and other Detectives with the opportunity to earn overtime.
320. On May 6, 2025, the Plaintiff forwarded the same complaint by email to First Assistant Prosecutor Ablu, receiving no response.
321. On June 5, 2025, the Plaintiff reported to work to find that ATS Unit Detectives were in the field on an overtime detail he was not made aware of.
322. On June 6, 2025, Defendants discontinued training of the plaintiff that had been in place since August 11, 2023.
323. Despite long-term assignment to, and experience with the drone unit, the Plaintiff has not been called out for service while in the drone unit, while the two other detectives in the unit have received overtime compensation for drone duties.
324. The Plaintiff was offered no overtime hours in 2025 despite being available and a senior Detective at the agency, until finally being offered on 09/12/2025 after the recently transferred Captain Pual Ranges implemented a seniority-based distribution on 9/11
325. On June 18, 2025, the Plaintiff complained on behalf of a PBA constituent about

Defendants invading the privacy of a Detective.

326. On June 18, 2025, the Plaintiff emailed Defendants County Counsel Sylvia Hall attempting to rectify conflicting policy regarding a Detective's leave of absence request.
327. On June 23, 2025, the Plaintiff submitted a pay grievance to Defendant McGuire related to refusal to comply with contractual obligations regarding pay.
328. On July 1, 2025, the Plaintiff emailed Defendant McGuire, Prosecutor Stephens, and First Assistant Albu complaining of Defendants failing to notify PBA 325 of a new Detective hire.
329. On July 3, 2025, PBA attorney David J. DeFillippo, Esq notified Prosecutor Stephens that forbidding the Plaintiff from communicating with the Prosecutor directly was a violation of labor law.
330. On July 8, 2025, the Plaintiff emailed Defendant McGuire advising McGuire's instructions to a Detective seeking a leave of absence, to refer to the Employee Handbook, is incorrect because such a request is contractual in nature.
331. On July 8, 2025, the Plaintiff served Prosecutor Stephens with a PERC grievance on the ongoing payroll matter regarding contractual pay steps.
332. On July 11, 2025, the Plaintiff sent an email to IA Captain Wesley Mondelus and Director Levinson with a time sensitive request for clearance of a Detective scheduled for retirement.
333. On July 15, 2025, CPT Mondelus responded by instructing the Plaintiff to have the Detective submit an Administrative Report to the chain of command.
334. The Plaintiff responded this was a request for the Detective's status on behalf of PBA 325.
335. On July 15, 2025, a PERC complaint of unfair labor practices was filed against

Prosecutor Stephens for prohibiting and reprimanding the Plaintiff for contact
Prosecutor Stephens on union business; A copy of the communication from a PBA
325 attorney was sent to County Counsel and Prosecutor Stephens.

336. The law of New Jersey guarantees the right of public employees to engage in union activities, including making their concerns known to their employer.
337. Prosecutor Stephens' tone was designed to discourage the Plaintiff from diligently pursuing the right to engage in union activities, advising his employer the ECPO of the concerns of his union constituents.
338. The PERC complaint specifically alleges the Defendants violated NJSA 34:13A-5.4(a)1
339. On June 27, July 8, and July 24, 2025, the Plaintiff requested to review his Chief's Personnel File and was not afforded the opportunity to do so.
340. The failure of Defendant McGuire to allow Plaintiff and other union officials to view their personnel file is a violation of their collective bargaining agreement with Defendants.
341. On July 25, 2025, the Plaintiff submitted a grievance regarding the failure of Defendants to afford the opportunity to review his personnel file.
342. After dropping off the grievance regarding the personnel file issue to SGT Silvestre of the ATS Unit, moments later, Defendant McGuire's secretary Grier came to the Plaintiff's desk with the grievance in hand and asked to speak with the Plaintiff.
343. The Plaintiff and Grier then walked into the waiting area of Defendant McGuire's office where Grier's desk is located.
344. Grier asked whether the Plaintiff had spoken to her about the personnel file matter before, then pointed to work piled on her desk and asked the Plaintiff to explain to her what a reasonable time to address his concerns were given how

much work she has.

345. The Plaintiff explained that the folder was supposed to be made available upon request and that one of his constituents had been waiting for months with no action.
346. Grier mentioned that HR staffer Kearny had some of the personnel files.
347. The Plaintiff pointed out that this was a violation of policy, as all personnel files should be located at the Chief's office and available for Detectives to review upon request.
348. Per ECPO policy SOP 15 there are three folders: Personnel, Professional Standards (IA), and Confidential, not multiple personnel folders.
349. Grier then told the Plaintiff to lower his voice at one point and speciously suggested the Plaintiff should calm down.
350. The Plaintiff was neither loud nor aggressive with Grier, he was simply explaining and responding to her inquiry, which Grier was not responsive to.
351. Grier knew or should have known the manner personnel files were stored by Defendant McGuire was in violation of policy, and she herself suggested she might be responsible for the delay in producing the file for inspection.
352. The Plaintiff told Grier the current time frame for review of personnel files was unreasonably long.
353. Grier responded by stating she would produce the requested files by next week.
354. Appear visibly angry, Grier left the office with grievance in hand.
355. The Plaintiff believes this incident may have been recorded by Defendants.
356. On July 31, 2025, the Plaintiff was compelled to respond to IA with a Detective because IA ordered the Detective to report on short notice, with no further information.

357. The Plaintiff and Detective arrived, and they IA did not greet them for 30 minutes or more, stated they were busy on a Zoom call, then went back into their office leaving the Plaintiff and his constituent Detective to wait.
358. The Plaintiff waited for approximately 20 more minutes, then left after the Detective provided contact information.
359. On August 1, 2025, the Plaintiff submitted a Grievance to SGT Telmo Silvestre of the ATS Unit regarding improper application of prorated pay to a retiring Detective.
360. Shortly later the same day, the Plaintiff was assigned four new cases.
361. The Plaintiff is typically assigned one or two new cases a week, but within 15 minutes of filing a grievance, four new cases were assigned to his already burdensome workload.
362. On August 1, 2025, the Plaintiff served a grievance on Defendant McGuire as Defendants had yet to produce the requested personnel files for review.
363. On August 1, 2025, the Plaintiff was once again compelled to appear at IA to represent a Detective called in on short notice.
364. At the completion of the IA interview, the Detective was served with an additional charge.
365. IA informed the Plaintiff that he was a “witness” and I therefore cannot represent the Detective on the charge.
366. Weaponizing the IA process for retaliation is a standard and accepted practice of Defendants, in particular Defendant McGuire.
367. In this instance the Plaintiff was named as a witness, because he was present when the Detective left IA after waiting an hour in the earlier short notice incident, for which the Detective was now being inexplicably charged.

368. The Plaintiff followed up by complaining to Defendant McGuire, the Director of IA, and First Assistant Ablu, that failure to provide appropriate notification to the PBA and Detectives of being an IA target constitutes labor law violations.
369. On August 4, 2025, the PBA 325 bulletin board originally mounted in the Main Hallway of the Prosecutors Office, was relocated to a corner of a small conference room at the back of the Adult Trail Unit.
370. Administration had previously complained to the Plaintiff that they did not like the content of the PBA board items he posted and retaliated by moving the PBA board into a largely untraveled corner of the office in retaliation for the Plaintiff's whistleblowing activities expressed on the board.
371. The Plaintiff learned from other union officials that he was been ostracized in the workplace by Defendants.
372. On September 8, 2025, Kecia Richardson-Gilbert, the Steward for the non-law enforcement staff union, advised the Plaintiff she was instructed not to come over to the cubicle to speak to him by her supervisor.
373. Richardson-Gilbert reported that her supervisor stated the Plaintiff's supervisor had attempted to stop their interaction, claiming that Richardson-Gilbert is disrupting ATS unit activities by communicating with the Plaintiff.
374. On September 8, 2025, Detective Quincy Davis advised the Plaintiff that overtime was being offered for a detail.
375. Davis sits directly behind the Plaintiff, so Davis was asked in private about the overtime opportunity to avoid the Plaintiff becoming aware overtime was offered.
376. As of October 3, 2025, there have been 58 personnel movements (transfers) in and out of Plaintiff's unit since his "temporary" transfer.
377. After more than a month of being denied the ability to review his personnel file,

the Plaintiff had filed a grievance with Defendant McGuire on August 1st, 2025.

378. Defendant McGuire's secretary, Grier, emailed the Plaintiff to make arrangements to finally view the file on August 4, 2025.
379. The Plaintiff met with Grier and Shelly Clark in the ATS Unit conference room at approximately 10am.
380. The Plaintiff reviewed his personnel file and discovered it contained a civil lawsuit he had previously filed against Defendants.
381. The Plaintiff believed the presence of the lawsuit in his personnel file to be inappropriate, as it is not relevant to job performance or administrative employment records.
382. The Plaintiff contacted the Director of HR Jones copying County Counsel Hall requesting the lawsuit documents be removed from the file.
383. On August 8, 2025, the Plaintiff filed a grievance related to a Detective being denied leave mandated by the Detectives' collective bargaining agreement.
384. On August 13, 2025, the Plaintiff was instructed to report to IA.
385. When the Plaintiff arrived, he was met by SGT David Posada and Mondelus who advised the Plaintiff he is a witness related to a matter he represented a Detective on from July 31, 2025
386. SGT Posada and SGT Syed Naqvi interviewed the Plaintiff, the Detectives union President and representative as a witness.
387. This retaliatory adverse employment action was designed by Defendants to discourage the Plaintiff from fulfilling his duties as PBA President, retaliation for his consistently whistle blowing behavior regarding illegal conduct by the Defendants.
388. On September 4, 2025, PBA attorney David J. DeFillippo, Esq notified County

Counsel that assigning detectives to work a reception desk is an inappropriate use of manpower outside the scope of a Detective's duties, and stated the practice needs to stop.

389. Furthermore, it was suggested Prosecutor Stephens should make better use of Detectives or the PBA will consider litigating the issue.
390. The New Jersey Conscientious Employee Protection Act ("CEPA") makes it unlawful for an employer to take any adverse employment action against an employee because that employee has reported an employer's violation of the law, a rule or regulation issued under the law.
391. The Plaintiff repeatedly came to the reasonable belief that Defendants' conduct was violating either a law, rule, regulation, or public policy.
392. The Plaintiff formed this belief based on his training, education, training and experience both as a seasoned law enforcement officer, and union official of PBA 325.
393. The Plaintiff repeatedly performed whistleblowing activities, reporting what he reasonably believed to be violations of law, rule, results, policies and procedures, not only to the highest levels of Defendants' chain of command, but also lodging official complaints with outside agencies including the New Jersey Office of Attorney General, the New Jersey State Comptroller, the New Jersey Department of Health, the Occupation Health and Safety Administration, The Department of Justice, and more.
394. The Plaintiff suffered an ongoing pattern and practice of adverse employment actions by the Defendants, everything from being denied overtime, banished to the Adult Trail Service, a dead-end work unit widely perceived as a punishment assignment, had former prestigious work duties and responsibilities removed,

targeted in specious Internal Affairs processes, assigned to substandard workspace, subject to policies designed only for him, assigned excessive/make-work assignments, harassed for utilizing leave under FMLA, and a host of other harassing actions in the workplace.

395. There is an unmistakable causal connection between the Plaintiff's whistleblowing activity and the pattern and practice of adverse employment actions.
396. Each time the Plaintiff engaged in whistleblowing activities, adverse employment actions from the Defendants followed in close temporal proximity.

FIRST COUNT:

NEW JERSEY CONSCIENTIOUS EMPLOYEE PROTECTION ACT

397. The Plaintiff repeats each paragraph above as if set forth below.
398. At all times relevant hereto Defendant Campo and Defendant McGuire were "supervisors" as defined in N.J.S.A. 34:19-2.
399. Defendant County of Essex had supervisory authority over Defendants Campo and McGuire.
400. At all times relevant Plaintiff was an "employee" and Defendant County of Essex was an "employer" as defined in N.J.S.A.34:19-2.
401. Defendant County of Essex is responsible for the actions of their supervisory employees.
402. Plaintiff repeatedly objected to activities of the Defendants which he reasonably believed violated laws, rules, policies and regulations, including those of Defendant Essex itself.
403. The Plaintiff diligently reported these violations to his superiors and to outside agencies.
404. Instead of taking prompt and effective actions to address the Plaintiff's

complaints, Defendant Essex aided and abetted Defendants Campo and McGuire in a long-term campaign of retaliation against the Plaintiff.

405. When the Plaintiff reported the violations occurring in the workplace, Defendant Essex took only perfunctory action and thereafter allowed and empowered Defendants Campo and McGuire to retaliate against the Plaintiff with impunity.
406. The Plaintiff engaged in protected activity by communicating complaints regarding violations of rules, regulations, laws, policies and procedures by his superiors, to his superiors and outside agencies.
407. Defendants McGuire and Campo repeatedly retaliated against the Plaintiff with adverse employment actions for his protected communications, his whistleblowing activities on a host of issues in Defendants' workplace.
408. The retaliatory adverse employment actions by Defendants Campo and McGuire were aided and abetted by Defendant Essex causing the Plaintiff emotional distress, adversely impacting the Plaintiff's good name and reputation, causing severe humiliation, damaging his career, and adversely affected his personal life and professional standing.
409. The retaliation by Defendants was severe or pervasive enough to make a reasonable Detective/Police Union President believe that the conditions of employment have been altered, and the working environment is hostile or abusive.
410. Instead of taking reasonable action to stop the illegal retaliation against the Plaintiff, Defendant Essex aided, abetted, and empowered Defendants McGuire and Campo to retaliate against the Plaintiff with impunity.
411. As a direct, foreseeable, and proximate result of the outrageous actions of the Defendants, Plaintiff suffered and continues to suffer damages including but not

limited to emotional distress, humiliation, loss of pay and benefits, loss of opportunity for advancement, loss of good name and reputation, and professional/personal embarrassment.

412. Defendants are jointly and severally liable for the Plaintiff's damages.

WHEREFORE Plaintiff demands judgment jointly and severally against Defendants for reinstatement, seniority level back pay and front pay, restoration of all seniority and all employee benefits that Plaintiff may have lost, compensatory damages for pain and suffering as well as loss of earnings and other employee benefits, damages for reputational and career development injury, consequential damages, incidental damages, punitive damages, attorney fees and costs of suit, injunctive relief requiring remediation of Defendants' discrimination and retaliation through affirmative action, retraining of all supervisor personnel in the civil rights of employees, including a course of instruction on anti-retaliation; requiring the Defendants to hire outside counsel to conduct a management improvement review of ECPO leadership, and follow any recommendations therein, and any other relief deemed by the Court to be equitable and just.

SECOND COUNT

NEW JERSEY FAMILY LEAVE ACT – RETALIATION

413. The Plaintiff sets forth each paragraph above as if set forth in fully below.

414. The Plaintiff is employed by Defendants as a Detective.

415. It is unlawful for any employer to interfere with, restrain or deny the exercise of, or the attempt to exercise, the rights provided under the New Jersey Family Leave Act.

416. The Plaintiff was and continues to serve satisfactorily in his position.

417. The Plaintiff's child has a condition requiring continuing medical treatment.

418. The Plaintiff took and sought to take leave from his employment to care for his ill child.
419. Defendants retaliated against the Plaintiff for exercising his rights under the New Jersey Family Leave Act.
420. Defendants interfered with the Plaintiff's exercise of his rights by sending the New Jersey State Police in May, 2024 to do a specious "wellness check" at the Plaintiff's home while he was on a medical leave day caring for his ill child.
421. Since at least October 13, 2023, the Defendants routinely retaliated against the Plaintiff by overloading him with work upon his return from utilizing family medical leave to care for his child.
422. Defendant Campo retaliated by demanding the Plaintiff enter the FMLA days into the time and attendance system immediately upon using them.
423. This rule did not align with Defendant Essex policy and applied only to the Plaintiff.
424. Each time the Plaintiff took leave to care for his daughter, Defendant Campo would harass the Plaintiff over the use of the leave.
425. The implied message Defendants were giving the Plaintiff was that he should not take medical leave because the Defendants disfavor it.
426. The Plaintiff complained about Defendant Campo's adverse employment acts of retaliation and harassment, to no avail.
427. The Plaintiff suffered emotional distress, humiliation, and embarrassment, and even unwarranted interference with his home by law enforcement acting on the request of Defendant Campo.
428. But for the illegal retaliatory acts of Defendant Campo, aided, abetted, condoned and ratified by Defendants Essex and McGuire, the Plaintiff would not have

suffered damages.

429. The illegal acts of the Defendants caused the Plaintiff's damages.
430. The Defendant are liable to the Plaintiff for damages, including punitive damages as described in the New Jersey Family Leave Act.

WHEREFORE Plaintiff demands judgment jointly and severally against Defendants for reinstatement, seniority level back pay and front pay, restoration of all seniority and all employee benefits that Plaintiff may have lost, compensatory damages for pain and suffering as well as loss of earnings and other employee benefits, damages for reputational and career development injury, consequential damages, incidental damages, punitive damages, attorney fees and costs of suit, injunctive relief requiring remediation of Defendants' discrimination and retaliation through affirmative action, retraining of all supervisor personnel in the civil rights of employees, including a course of instruction on anti-retaliation; requiring the Defendants to hire outside counsel to conduct a management improvement review of ECPO leadership, and follow any recommendations therein, and any other relief deemed by the Court to be equitable and just.

THIRD COUNT

NEW JERSEY LAW AGAINST DISCRIMINATION (RETALIATION)

431. The Plaintiff repeats all paragraphs above as set forth fully below.
432. The NJLAD makes it illegal for employers to coerce, intimidate, threaten or interfere with any person on account of that person having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by the NJLAD.
433. The Plaintiff is the President of the Detectives Union in Defendants' workplace.

434. As part of his duties the Plaintiff advocates to the Defendants on behalf of Detectives who allege or are victims of bias-discrimination, harassment, and sexual harassment in Defendants' workplace.
435. The Plaintiff advocated on behalf Detectives between October 2023 and present on matters of sexual harassment, discrimination and retaliation.
436. The Plaintiff raised opposition to practices or acts that are unlawful under the NJLAD, complaining about and protesting against, discrimination in the workplace in protected communications with Defendants Campo, McGuire, the Inspector General, and other officials of Defendant Essex.
437. In close temporal proximity to making protected communications to the Defendants, the Plaintiff was subjected to retaliatory adverse employment actions.
438. The actions of Defendants were designed to coerce and intimidate the Plaintiff into abandoning advocacy on NJLAD covered matters of bias-based discrimination, retaliation and sexual harassment on behalf of his Detective constituents.
439. There is an unmistakable direct causal relationship between the Plaintiffs protected communications and activities on behalf victims of workplace discrimination, and the adverse employment actions taken against him by the Defendants
440. This NJLAD claim is separate and distinct from the Plaintiff's CEPA claim, addressing the retaliation based on opposition to discrimination, retaliation and sexual harassment in the workplace against his constituents, which contributed towards the hostile work environment created by the Defendants in their workplace.
441. The adverse employment actions of the Defendants caused the Plaintiff emotional

distress, humiliation, embarrassment, and caused him to live in constant fear of retaliation from the Defendants while accomplishing his employee advocacy duties as PBA President.

442. As a direct, foreseeable, and proximate result of the outrageous actions of the Defendants, Plaintiff suffered and continues to suffer damages including but not limited to emotional distress, humiliation, loss of pay and benefits, loss of opportunity for advancement, loss of good name and reputation, and professional/personal embarrassment.
443. But for the acts of the Defendants, the Plaintiff would not have suffered damages.
444. The Defendants are liable to the Plaintiff for damages.

WHEREFORE Plaintiff demands judgment jointly and severally against Defendants for reinstatement, seniority level back pay and front pay, restoration of all seniority and all employee benefits that Plaintiff may have lost, compensatory damages for pain and suffering as well as loss of earnings and other employee benefits, damages for reputational and career development injury, consequential damages, incidental damages, punitive damages, attorney fees and costs of suit, injunctive relief requiring remediation of Defendants' discrimination and retaliation through affirmative action, retraining of all supervisor personnel in the civil rights of employees, including a course of instruction on anti-retaliation; requiring the Defendants to hire outside counsel to conduct a management improvement review of ECPO leadership, and follow any recommendations therein, and any other relief deemed by the Court to be equitable and just.



Date: October 9, 2025

By: _____

Christopher J. D'Alessandro, Esq.

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is, in limited part, the subject of another action CO-2026-008 pending before PERC filed as an Unfair Labor Practice. Some allegations in this matter were also previously brought forth in ESX-L-001877-23, dismissed without prejudice. To the best of my knowledge and belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.



Date: October 9, 2025

Christopher J. D'Alessandro, Esq.

CERTIFICATION PURSUANT TO RULE 1:38-7

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 1:39-7(b).



Date: October 9, 2025

Christopher J. D'Alessandro, Esq.

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court Rules 1:8-2(b) and 4:35-1(a).



Date: October 9, 2025

Christopher J. D'Alessandro, Esq

Christopher J. D'Alessandro, Esq. is hereby designated as trial counsel for Plaintiff, Jason Gorto in the above matter.



Dated: October 9, 2025

Christopher J. D'Alessandro, Esq.
Donelson, D'Alessandro & Peterson, LLC
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Woodbury New Jersey 08096
(856) 839-6058
chris@ddplawfirm.com
Attorneys for Plaintiff, Anthony DeProspo

Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-007799-25

Case Caption: DEPROSPO ANTHONY VS COUNTY OF ESSEX

Case Initiation Date: 10/09/2025

Attorney Name: CHRISTOPHER J D'ALESSANDRO

Firm Name: DONELSON, D'ALESSANDRO & PETERSON, LLC

Address: 3 S BROAD ST
WOODBURY NJ 08096

Phone: 8565375793

Name of Party: PLAINTIFF : DeProspos, Anthony

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

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

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

Are sexual abuse claims alleged by: Anthony DeProspos? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

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

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Employer/Employee

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

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

Plaintiff is President of the Essex County Pros Office Detective's Union.

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

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

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

10/09/2025
Dated

/s/ CHRISTOPHER J D'ALESSANDRO
Signed

