

**CIVIL RIGHTS COMPLAINT**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

RECEIVED-CLERK  
U.S. DISTRICT COURT

2006 MAY 23 A 10:51

TERIQUE JONES

Darren E. Richardson, et al.  
(Enter above the full name of the plaintiff in this action)

**COMPLAINT**

06-2461(DMC)

v.

Civil Action No. ~~06-23490~~ (DMC)  
(To be supplied by the Clerk of the Court)

Morris County Correctional

Facility, Sheriff Edward V.

Reichard, Chief Ralph McGraw,

Warden Frank Corrente, Captain

Collins, Captain Deemer, John Does  
(Enter above the full name of the defendant or defendants  
in this action)

and Jane Does 1-10, X42

**INSTRUCTIONS -- READ CAREFULLY**

1. This complaint must be legibly handwritten or typewritten, signed by the plaintiff and subscribed to under penalty of perjury as being true and correct. All questions must be answered concisely in the proper space on the form. Where more space is needed to answer any question, attach a separate sheet.
2. In accordance with Rule 8 of the Federal Rules of Civil Procedure, the complaint should contain (1) a short and plain statement of the grounds upon which the court's jurisdiction depends, (2) a short plain statement of the claim showing that you are entitled to relief, and (3) a demand for judgment for the relief which you seek.
3. You must provide the full name of each defendant or defendants and where they can be found.
4. You must send the original and one copy of the complaint to the Clerk of the District Court. You must also send one additional copy of the complaint for each defendant to the Clerk. Do not send the complaint directly to the defendants.
5. Upon receipt of a fee of \$150.00, your complaint will be filed. You will be responsible for service of a separate summons and copy of the complaint on each defendant. See Rule 4, Federal Rule of Civil Procedure.

**FORM TO BE USED BY A PRISONER IN FILING A  
CIVIL RIGHTS COMPLAINT**

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 CIVIL RIGHTS COMPLAINT

6. If you cannot prepay the \$150.00 filing fee, you may request permission to proceed in forma pauperis in accordance with the procedures set forth below. (If there is more than one plaintiff, each plaintiff must separately request permission to proceed in forma pauperis.)

The Prison Litigation Reform Act of 1996 ("PLRA"), effective April 26, 1996, has made significant changes to the in forma pauperis statute, 28 U.S.C. § 1915. The statute no longer provides for waiver of court filing fees for prisoners who are granted leave to proceed in forma pauperis. A prisoner who is granted leave to proceed in forma pauperis is not required to pay the filing fees in advance, but the prisoner is obligated to pay the entire filing fee in installment payments regardless of the outcome of the proceeding. This obligation to pay the filing fee continues even if the prisoner is transferred to another prison. Therefore, before submitting this application to the Clerk of the Court, a prisoner should consider carefully whether he or she wishes to go forward with the action.

The PLRA obligates prisoners who are granted in forma pauperis status to pay the entire filing fee in the following manner, regardless of the outcome of the litigation. 28 U.S.C. § 1915(b)(1) and (2). The agency having custody over the prisoner shall deduct from the prisoner's institutional account and forward to the Clerk of the Court (1) an initial partial filing fee equal to 20% of the greater of the average monthly deposits to the prisoner's account or the average monthly balance in the prisoner's account for the six-month period immediately preceding the filing of the complaint, and (2) payments equal to 20% of the preceding month's income credited to the prisoner's institutional account each month the amount in the account exceeds \$10.00, until the \$150.00 filing fee is paid. 28 U.S.C. § 1915(b)(1) and (2). However, a prisoner who has no assets and no means by which to pay the initial partial filing fee will not be prohibited from bringing a civil action. 28 U.S.C. § 1915(b)(4).

Each prisoner plaintiff who desires to proceed in forma pauperis must submit the following to the Clerk of the Court:

- a. a completed, signed, and dated application to proceed in forma pauperis (attached hereto); and
  - b. a certified copy of your prison account statement for the 6-month period immediately preceding submission of this application, listing the account balance and all deposits into the account. A prison account statement must be obtained from the appropriate official of each prison at which you are or were confined during the preceding 6 months.
7. If your application to proceed in forma pauperis does not conform to these instructions, you will be notified by letter of the nature of the deficiencies. If these deficiencies are not cured within 120 days of the date of the letter, the complaint will be deemed withdrawn, the Clerk's file will be closed, and no fees will be assessed against you.
8. If you are given permission to proceed in forma pauperis, the Clerk will prepare and issue a copy of the summons for each defendant. The copies of summonses and the copies of the

**FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT**

complaint which you have submitted will be forwarded by the Clerk to the United States Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can locate and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

QUESTIONS TO BE ANSWERED

1. Jurisdiction is asserted pursuant to (CHECK ONE)

42 U.S.C. § 1983 (applies to state prisoners) *pre-trial detainees*

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

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

\_\_\_\_\_

2. Previously Dismissed Federal Civil Actions or Appeals

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

a. Parties to previous lawsuit:

Plaintiff(s): N/A

\_\_\_\_\_

Defendant(s): \_\_\_\_\_

\_\_\_\_\_

b. Court and docket number: \_\_\_\_\_

c. Grounds for dismissal: ( ) frivolous ( ) malicious ( ) failure to state a claim upon

**FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT**

which relief may be granted

d. Approximate date of filing lawsuit: \_\_\_\_\_

e. Approximate date of disposition: \_\_\_\_\_

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

3. Place of Present Confinement? Morris County Correctional Facility ("MCCF")

4. Parties

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

a. Name of plaintiff: Darren E. Richardson, #24557; Terque Jones, #23923;

Address: MCCF, 43 John Street, Morristown, New Jersey,

07960-4239 Omar Thomas, #17044

Inmate #: Kenneth Daniels, #23921; Jose Rodriguez, #25351

b. First defendant -- name: Edward V. Raebford

Official position: Sheriff

Place of employment: Morris County Sheriff's Office

43 John Street, Morristown, New Jersey 07960-4239

How is this person involved in the case?

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

Operated and/or Facilitated and/or Maintained and/or Allowed

the Morris County Correctional Facility Staff to engage in

violative acts claimed herein.

CIVIL RIGHTS COMPLAINT

c. Second defendant - name: Chief Ralph McGrane

Official position: Undersheriff

Place of employment: Morris County Correctional Facility  
43 John Street, Morristown, New Jersey 07960-4239

How is this person involved in the case?  
(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

For operating and for facilitating and for maintaining and for  
allowing the MOCF staff to engage in violative acts claimed  
herein.

d. If there are more than two defendants, attach a separate sheet. For each defendant specify: (1) name, (2) official position, (3) place of employment, and (4) involvement of the defendant.

all at MOCF, 43 John Street, Morristown, New Jersey  
07960-4239

Attached.

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

Yes  No in part

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

Through several Grievances and Inmate Request Forms and  
also verbally. Also, grievances were denied before completion  
regarding strip search issues. Some documents were also disposed  
of by the Facility's Staff during "Shahadats" and removal of property.

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

d.

Third defendant -- name: Frank Corrente

Official position: Warden

Place of employment: Morris County Correctional Facility

How is this person involved in the case?

For operating and/or facilitating and/or maintaining and/or allowing the MCCF staff to engage in violative acts claimed herein.

Fourth defendant -- name: Captain Collins

For reasons same.

Fifth defendant -- name: Captain Deemer

For reasons same

Sixth thru Fifteenth defendants -- names: John Dors and Jane  
Roes 1-10

## 6. Statement of Claims

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

1. Jail policy for any and all inmates placed into Prehearing Detention or Disciplinary Detention is that each and every inmate's solitary cell be thoroughly searched on a daily basis, and each individual inmate be strip searched, on recorded camera, on a daily basis, as punishment/discipline, subjecting him or her to remove all of his or her clothing, assuming an unpleasant position, causing embarrassment and humiliation;

2. Random cell searches are conducted ("shakedowns") and all inmates are required to strip search;

3. Incoming / Outgoing Mail Delivery is not conducted on Saturdays;

4. No law library schedule is posted;

5. Vegetarian trays are not sufficient - does not meet daily requirements;

6. Inmates are provided with old, used, uncleaned, unsanitary latrine.



7. Inmates are denied access to Federal Case Law.

7. Relief

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

1. Declare that the conduct of the defendants is unlawful as mentioned herein;

2. Enjoin the defendants from continuing to engage in these unlawful acts;

3. Order that the defendants immediately remedy these problems;

4. Enter an award against defendants and in favor of plaintiffs for compensatory damages;

5. Award punitive damages against defendants;

6. Award plaintiffs their costs of suit.

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

Jury Trial

Non-Jury Trial

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

Signed this 17<sup>th</sup> day of May, 2006.

Darren E. Richardson  
Darren E. Richardson, #245577

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FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

Signature of plaintiff<sup>1</sup>

John Rich #24557

Date: May 17, 2006

Darren E. Richardson, #24557

Terrique Jones #23923

Date: May 17, 2006

Terrique Jones, #23923

Kenneth Daniels #23921

Date: May 17, 2006

Kenneth Daniels, #23921

Jesse Rodriguez #25351

Date: MAY 17, 2006

Jesse Rodriguez, #25351

Ornae Thomas #170514

Date: 5-17-06

<sup>1</sup> EACH PLAINTIFF NAMED IN THE COMPLAINT MUST SIGN THE COMPLAINT HERE. ADD ADDITIONAL LINES IF THERE IS MORE THAN ONE PLAINTIFF. REMEMBER, EACH PLAINTIFF MUST SIGN THE COMPLAINT.



# MORRIS COUNTY CORRECTIONAL FACILITY

## Inmate Grievance Form #

Inmate Name: Terique Jones I.D.# 23923 Date: 4/17/06  
 Housing Unit: 3-B 1 page of 1

Nature of Grievance: Outgoing Legal Mail  
 I have a very important motion that needs to be mailed out to several parties. I have already been delayed because Friday April 14 was a Holiday, and Saturdays this facility refuses to deliver outgoing mail. Today is now Monday, and is not a Holiday, but outgoing mail was not picked up until 2<sup>nd</sup> shift. My important legal work now has to wait even another day before being properly delivered to all necessary parties (including a Superior Court Presiding Judge and Attorney General Zulima Farber, Esq.)

Referred by: [Signature] Date: 4/17/06

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Recorded by: \_\_\_\_\_ Date: \_\_\_\_\_

Referred to: \_\_\_\_\_ Date: \_\_\_\_\_

Answer to grievance:

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Answered by: \_\_\_\_\_ Date: \_\_\_\_\_

[Signature]



# MORRIS COUNTY CORRECTIONAL FACILITY

## Inmate Grievance Form #

Inmate Name: Darren Richardson I.D. # 24557 Date: April 17, 2006  
Housing Unit: 3-B page of 1

Nature of Grievance: I have important paperwork to be mailed out; however, the facility has made it impossible to mail in a timely manner. Mail that was delivered to the facility on Thursday, April 13, 2006, was not distributed until late (approx. 15:50) on Monday, April 17, 2006. **EVEN IMPORTANT AND URGENT LEGAL MAIL WAS DELAYED.** More importantly, there was no outgoing pick-up for 3-B between Thursday morning and Monday nite (after delivery hours) and, therefore, my important paperwork which must be delivered within time limitations was subjected to an unnecessary delay. Outgoing mail should have been delivered to the Post Office on Monday (if not

Referred by: Det. J. H. [Signature] Date: 4/17/06

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Recorded by: \_\_\_\_\_ Date: \_\_\_\_\_

Referred to: \_\_\_\_\_ Date: \_\_\_\_\_

Answer to grievance:  
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Answered by: \_\_\_\_\_ Date: \_\_\_\_\_

JOANNO-SARAVITA  
2 Lake Drive  
Haskell NJ 07420



NJ METRO P&DC  
NJ 076 G T  
14 APR 2006 PM

3B  
received 4/21/06

Darren Richardson  
43 John Street  
Morristown NJ 07960







# MORRIS COUNTY CORRECTIONAL FACILITY

## INMATE REQUEST FORM

Inmate Name	Darren Richardson		3-B	5/12/06
Inmate Commitment #	24557	Inmate ID	24557	93
Request	Please provide the following cases (not on disc)			
	Banks v. Sheahan, 914 F.Supp. 231 (1995)			
	Oldham v. Chandler - Hartford, 877 F.Supp. 1340			
	Wilson v. Schomig, 863 F.Supp. 989 (1994)			
	Rhodes v. Knight, 861 F.Supp. 980 (1994)			
	Ernst v. Borough of Fort Lee, 739 F.Supp. 220 (1990)			
	Davis v. City of Camden, 657 F.Supp. 396 (1987)			
	Mitchell v. Untreiner, 421 F.Supp. 886 (1976)			
	Johnson v. Avery, 393 U.S. 483 (1969)		X	
	Kennedy v. Mendoza - Martinez, 392 U.S. 144 (1963)			
	Lanza v. New York, 370 U.S. 139 (1962)			



# MORRIS COUNTY CORRECTIONAL FACILITY

## INMATE REQUEST FORM

Inmate Name	Darren Richardson		3-B	5/17/06
Inmate Commitment #	24557	Inmate ID	24557	93
Request	Warden Corrente			
	As I am sure you are aware, I have a set court date before Judge Falcone on June 22, 2006, regarding my motion/petition against MCCF. Accordingly, legal briefs are due on June 14, 2006. I have just received notice from the facility paralegal that you are denying me access to Federal Case Law and, therefore, denying and prejudicing my preparation of my legal brief. Please be advised that Federal Case Law deals with the U.S. Constitution, and therefore applies to New Jersey law through the Fourteenth Amendment. <i>Jali</i>			

# Morris County Sheriff's Office

## Bureau of Corrections

A Nationally Accredited Agency

43 JOHN STREET, MORRIS TOWNSHIP, NEW JERSEY 07960  
PHONE 973-631-5175 • FAX 973-993-9653

Ralph McGrane  
Undersheriff

EDWARD V. ROCHFORD  
SHERIFF

Frank Corrente  
Warden

TO: Darren Richardson, 3B  
FROM: Paralegal  
DATE: May 17, 2006  
RE: Inmate Request (5/12/06)

As per your request dated 5/12/06 and per the warden, this request will not be able to be taken care of since the requests that you are submitting are too voluminous and should be limited to cases that pertain New Jersey law.

If you have any questions or concerning regarding this matter, please contact Warden Corrente.

C: Warden Corrente  
File



**MORRIS COUNTY CORRECTIONAL FACILITY**

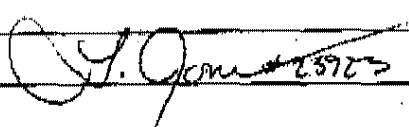
**INMATE REQUEST FORM**

Inmate Name	Terique Jones	Inmate ID	3B	Date	5-12-06
Inmate Commitment #	23923	Inmate ID	23923		11
Request	Case Law (not in law library or discs)				
	Darcy v. Ryan, 999 F.2d 679				
	White v. Frank, 855 F.2d 956 (1988)				
	Wildberger v. Bracknell, 869 F.2d 1467 (1989)				
	Adams v. James, 784 F.2d 1077 (1986)				
	Bonner v. Coughlin, 517 F.2d 1131 (1975)				
	United States v. Lilly, 576 F.2d 1240 (1978)				
	Allen v. Sakai, 48 F.3d 1082 (1994)				
	Ferran v. Town of Nassau, 11 F.3d 21 (1994)			<input checked="" type="checkbox"/>	
	Singer v. Fulton County Sheriff, 63 F.3d 110 (1995)				
	Higgason v. Farley, 83 F.3d 807 (1996)				



**MORRIS COUNTY CORRECTIONAL FACILITY**

**INMATE REQUEST FORM**

Inmate Name	Terique Jones	Inmate ID	3-B	Date	5/17/06
Inmate Commitment #	23923	Inmate ID	23923		11
Request	Warden Frank Corrente				
	The paralegal has informed me that "per the Warden" I cannot have access to Federal Case Law. Federal Case Law does apply to New Jersey Law when it deals with Constitutional issues. Access to the Courts is a Constitutional mandate, and I am now being denied adequate Access to the Courts.				
					



# Morris County Sheriff's Office

## Bureau of Corrections

A Nationally Accredited Agency

43 JOHN STREET, MORRIS TOWNSHIP, NEW JERSEY 07960

PHONE 973-631-5175 • FAX 973-993-9653

Ralph McGrane  
Undersheriff

**EDWARD V. ROCHFORD**  
SHERIFF

Frank Corrente  
Warden

TO: Terique Jones, 3B  
FROM: Paralegal  
DATE: May 17, 2006  
RE: Inmate Request (5/12/06)

As per your request dated 5/12/06 and per the warden, this request will not be able to be taken care of since this request that you are submitting is too voluminous and should be limited to cases that pertain New Jersey law.

If you have any questions or concerning regarding this matter, please contact Warden Corrente.

C: Warden Corrente  
File



# MORRIS COUNTY CORRECTIONAL FACILITY

## INMATE REQUEST FORM

Inmate Name	Darren Richardson	Housing Location	3-B	Date	4/11/06
Inmate Commitment #	24557	Inmate ID #	24557	Property #	93
Request	Warden Corrente				
<p>I would like to know the Facility's policy on copies being made for pro se Plaintiff's / Defendants that are housed here. I have received a Judge Order from the Honorable Anthony J. Graziano, J.S.C., of the Passaic County Superior Court, and have been unable to make copies and have been dropping request slips to go to the Law Library. Mail received on Fri. or Sat. does not get handed out until at least Monday, as Law Library schedule (as required in 10A law) is ever posted, as per</p>					
<p>Rules of Court, pro se Plaintiff's / Defendants must copy and mail Order to all parties. Jph</p>					

St. Zeylan



# MORRIS COUNTY CORRECTIONAL FACILITY

## INMATE REQUEST FORM

Inmate Name	Darren Richardson	Housing Location	3-B	Date	4/24/06
Inmate Commitment #	24557	Inmate ID #	24557	Property #	93
Request	Warden Corrente				
<p>My problem with the issues of making copies has not been resolved. Last week I had access to the law library on Mon. (4/17) and Fri. (4/21). On Friday (4/21) there was <del>no</del> copy machine available. I have an Order signed by Judge John Harper, J.S.C., on April 13, 2006. I need to be able to make copies of judges' Orders as a pro se Plaintiff / Defendant. Also needed to be copied is a Tort Form and a Certification. These matters are very important. I have really tried other remedies, Jph</p>					



## MORRIS COUNTY CORRECTIONAL FACILITY

### Inmate Grievance Form

# 5064

Inmate Name: Darren Richardson I.D. # 24557 Date: 4/24/06  
 Housing Unit: 3-B 1 page of 1

Nature of Grievance: Copies.

I have received an Order from the Honorable John J. Harper, J.S.C., signed April 13, 2006. As the pro se Plaintiff it is my responsibility and mandatory that I copy and deliver such Order accordingly to all parties. At MCCF I never know when or how to get such appropriate copies made. On Friday, April 21, 2006, the copy machine in the law library was not available for use. It has been over a week since I have had access to make copies for legal purposes. Sgt. Zeglen informed me to notify Social Services for copies. Officer Schweizer contacted Social Services for me, but there has been no remedy. *Ala A*

Referred by: Sgt. Zeglen

Date:

Received by: E. Schweizer

Date: 04-24-06

Recorded by: HPotter

Date: 4-26-06

Referred to: K. Murphy

Date: 4-26-06

Answer to grievance:

The copy machine in the Law Library was replaced the morning of April 21, 2006 and available for inmate use. Inmate Richardson attended the Law Library on April 21, 2006. Since then Inmate Richardson has attended the Law Library Tuesday April 25, Wednesday April 26 and Friday April 28.

Answered by: K. Murphy

Date: 5/1/06



# MORRIS COUNTY CORRECTIONAL FACILITY

## Inmate Grievance Appeal Form #

Inmate Name: Darren Richardson I.D. # 24557 Date: 5/2/06  
Housing Unit: 3-B 1 page of 1

Reason for Appealing: Appealing Grievance Form # 5064.  
I have had a similar situation in the past about grievances concerning an issue with copies being made for urgent legal matters. Difference is before it was Cpl. Yuriele facilitating the law library, now its officer Murphy. The problem, however, remains unaddressed because the issue is ~~not~~ these individual officers. If an inmate is unable to obtain copies through the law library for whatever specific reasons (off. on vacation, copy machine broke, off. on signa duty, etc.), there should be an alternate method for obtaining copies that are urgent, and prior notification of the law library not being open (or a schedule or other given reason that request for legal issues cannot be immediately fulfilled.

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Recorded by: \_\_\_\_\_ Date: \_\_\_\_\_

Answered to grievance Up Held

Answer to grievance modified as follows

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Administrators Signature: \_\_\_\_\_ Date: \_\_\_\_\_





# MORRIS COUNTY CORRECTIONAL FACILITY

## Inmate Grievance Form #

Inmate Name: Terique Jones I.D. # 23923 Date: 5/8/06  
Housing Unit: 3-B 1 page of 1

Nature of Grievance: Copies (Social Worker and others)

I have trial beginning this week. I have important legal mail that should have been sent out on Friday (5/5/06), but no law library was called. There is NEVER a law library schedule posted - inmates NEVER know when they'll be able to make copies. Per several Sgts., if copies are needed and urgent, the social worker can make such copies. A request slip was written to the social worker explaining my situation and how I need to have my legal out by today. All requests were denied, and now further action is needed.

[Signature]

Referred by: \_\_\_\_\_ Date: \_\_\_\_\_

Received by: [Signature] 195 Date: 5/8/06

Recorded by: \_\_\_\_\_ Date: \_\_\_\_\_

Referred to: \_\_\_\_\_ Date: \_\_\_\_\_

Answer to grievance:

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Answered by: \_\_\_\_\_ Date: \_\_\_\_\_

Darren E. Richardson, #24557  
Morris County Correctional Facility  
43 John Street  
Morristown, New Jersey 07960

April 24, 2006

TO: WARDEN FRANK CORRENTE  
Morris County Correctional Facility  
43 John Street  
Morristown, New Jersey 07960

RE: VERIFIED NEED REQUEST PURSUANT TO 10A:6-2.4b(5)

WARDEN CORRENTE:

Please accept this letter as a formal request for verified need legal access pursuant to New Jersey Administrative Code, specifically 10A:2.4b(5). Several Inmate Request Forms and oral requests have not successfully resolved this matter to date.

For the past eight months that I have been housed in your facility, legal access has not been consistent. This has effected my scheduling of filing and other important legal time prescedent issues. Attached are Certifications in support of my verified need request due to my personal legal matters along with issues that I am presently assisting other inmates here with.

I trust that you will consider my request valid and grant me the necessary legal access accordingly. Your anticipated assistance with this matter is deeply appreciated.

Sincerely,

Darren E. Richardson  
Darren E. Richardson  
#24557

Enclosures: (1) Certification of Darren E. Richardson  
(2) Certification of Terique Jones

C: Legal File

# MORRIS COUNTY SHERIFF'S OFFICE

## Bureau of Corrections

### Internal Affairs Unit

43 John Street, Morris Township, NJ 07960

Phone (973) 631-5421 \* Fax (973) 285-6802

**EDWARD V. ROCHFORD**  
SHERIFF

Ralph McGrane  
Undersheriff

Frank Corrente  
Warden

TO: Inmate Jose Rodriguez, #C  
FROM: Paralegal  
DATE: December 16, 2005  
RE: Inmate Request (12/14/05)

This is to inform you, per the warden, if you would like to have the document (release) notarized, you will have to go through your attorney.

C: file



# MORRIS COUNTY CORRECTIONAL FACILITY

## Inmate Grievance Form #

Inmate Name: Darren Richardson I.D. # 24559 Date: 3/2/06  
 Housing Unit: 3-B 1 page of 1

Nature of Grievance: Nutritional Meals. I have tried to remedy an ongoing problem with the Food Services here for several months now. I still continuously receive trays that do not fit my diet. For lunch today I received noodles, beans, and cheese (main course). I am on a no dairy diet. The officer called the kitchen and subsequently an Islamic tray was sent up. This tray had chicken as a main course - I get no meat. I asked if the worker could please just bring me some peanut butter in replacement for the cheese or chicken. Araham informed the officer that I had a sufficient tray by just the beans and noodles alone. JAH

Referred by: \_\_\_\_\_ Date: \_\_\_\_\_

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Recorded by: \_\_\_\_\_ Date: \_\_\_\_\_

Referred to: \_\_\_\_\_ Date: \_\_\_\_\_

Answer to grievance:

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Answered by: \_\_\_\_\_ Date: \_\_\_\_\_





# MORRIS COUNTY CORRECTIONAL FACILITY

## Inmate Grievance Form

# 5050

Inmate Name: Darren Richardson I.D. # 24557 Date: 3/7/06  
Housing Unit: 3-B page of 1

Nature of Grievance: I have been here for almost (8) months, and the kitchen (Aramark) continues to disregard my allergies. Also, they seem to ignore every grievance and/or other attempts of remedy. I am allergic to milk. Lately, I have again been receiving dairy on my trays. This morning for breakfast served was: (1) two eggs; (2) two slices of bread; (3) a cake; (4) cereal; (5) a banana; and (6) milk. I do not get milk and, therefore, am unable to eat cereal. I have offered in the past - only to test- trouble the kitchen staff - to accept cereal on my tray so long as I receive a juice instead of milk. Per the c/o this morning, Aramark said, "Eat it dry." The kitchen seems to "retaliate" rather

Referred by: SGT SKL Date: 4/7/06 <sup>remedy</sup>

Received by: OR MS Date: 4-9-06 <sup>grievance</sup>

Recorded by: L. Pottler Date: 4-17-06 <sup>to this pr</sup>

Referred to: By Bailey Date: 4-17-06 <sup>was 3/21</sup>

Answer to grievance:

I saw you are on diet list. I told all supervisor for standard meals and sub meals. One part I agree with you on that day what they sent to you. Dry cereal and cake, they should not sent that item to you. They should send indmeal or grits instead.

If they send you with milk product or meat product to you, you will call for another tray. Like you said, eat it dry. Whoever supervisors said that I need to know the name for future. Is not acceptable for me.

Answered by: Kyan Date: 4/22/06

(Amy Aye)  
Received on 4/19/06