

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

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DANA CLARK STEVENSON and	:	
MARK HENDRICKS and	:	
KENNETH FUQUA and	:	
DARIUS SNEAD, individually and	:	<b>CLASS ACTION COMPLAINT</b>
on behalf of a class of others similarly	:	
situated	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
THE COUNTY OF SALEM,	:	
	:	
Defendant.	:	

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**INTRODUCTION**

This is a class action brought to redress the deprivation by Defendant of rights secured to the Plaintiffs and the proposed Class by the United States Constitution, the laws of the United States of America, and the New Jersey Constitution. For at least the past two years, the Salem County Correctional Facility (SCCF) has had a policy and practice of illegally strip searching detainees in violation of the fourth amendment to the United States Constitution and Article 1 Paragraph 7 of the New Jersey Constitution. And providing clothing to detainees who are classified and mis-classified as suicidal in violation of the eighth amendment to the United States Constitution and Article 1 Paragraph 12 of the New Jersey Constitution.

**JURISDICTION**

1. This Court has jurisdiction over this action under the provisions of 28 U.S.C. §§ 1331, 1341 & 1343 because it is filed to obtain compensatory damages and injunctive relief for the deprivation, under color of state law, of the rights of citizens of the United States secured by the Constitution and federal law pursuant to 42 U.S.C. §1983 and 42 U.S.C. §§ 12101 *et seq.* This Court also has jurisdiction over this action under the provisions of 28 U.S.C. § 2201, as it is filed to obtain declaratory relief relative to the constitutionality of the policies of a local government. This Court has jurisdiction of the State law claims under 28 U.S.C. §§ 1367 in that when district courts have original jurisdiction, the district courts shall have supplemental jurisdiction over all other claims that are so related to claims in the action within such original jurisdiction that they form part of the same case or controversy under Article III of the United States Constitution.

2. Venue is proper under 28 U.S.C. § 1391(e)(2) because the events giving rise to Plaintiffs' claims occurred in this judicial district.

**PARTIES**

3. Plaintiff Dana Clark-Stevenson (“Ms. Clark-Stevenson”) resides in Salem County, New Jersey. She entered Salem County Jail on a failure to pay a fine and was according to the policies customs and practices of Salem County Jail strip searched prior to her admission to general population, was classified as suicidal for no apparent reason, made to wear garments which exposed her private parts, and was routinely strip searched up to three times per day absent any legitimate penalogical purpose. Her rights were violated because she was strip searched in violation of the Fourth Amendment to the United States Constitution, Article 1 Paragraph 7 of the New Jersey Constitution, and provided clothing which violated her rights under the Eighth Amendment United States Constitution and Article 1 Paragraph 12 of the New Jersey Constitution. Additionally, according to the policies/practices and customs of Salem County, Plaintiff was strip searched in a non-private public setting in violation of the Fourth Amendment to the United States Constitution, Article 1 Paragraph 7 of the New Jersey Constitution.

4. Plaintiff Kenneth Fuqua (“Mr. Fuqua”) resides in Cumberland County, New Jersey. His rights were violated because he was classified as suicidal for no apparent reason, made to wear garments which exposed his private parts, and was routinely strip searched up to three times per day absent any legitimate penalogical purpose in violation of the Fourth Amendment to the United States Constitution, Article 1 Paragraph 7 and provided clothing which violated his rights under the Eighth Amendment United States Constitution and Article 1 Paragraph 12 of the New Jersey Constitution. Additionally, according to the policies/practices and customs of Salem County, Mr. Fuqua was strip searched in a non-private public setting in violation of the Fourth Amendment to the United States Constitution, Article 1 Paragraph 7 of the New Jersey Constitution.

5. Plaintiff Mark Hendricks ("Mr. Hendricks") resides in Gloucester County, New Jersey. His rights were violated because he was strip searched was classified as suicidal for no apparent reason, made to wear garments which exposed her private parts, and was routinely strip searched up to three times per day absent any legitimate penalogical purpose in violation of the Fourth Amendment to the United States Constitution, Article 1 Paragraph 7 of the New Jersey Constitution, and provided clothing which violated hisrights under the Eighth Amendment United States Constitution and Article 1 Paragraph 12 of the New Jersey Constitution. Additionally, according to the policies/practices and customs of Salem County, Mr. Hendricks was strip searched in a non-private public setting in violation of the Fourth Amendment to the United States Constitution, Article 1 Paragraph 7 of the New Jersey Constitution.

6. Darius Snead ("Mr. Snead") resides in Cumberland County, New Jersey. He entered Salem County Jail on a failure to pay a fine and was according to the policies customs and practices of Salem County Jail strip searched prior to his admission to general population, was classified as suicidal because he was inebriated, made to wear garments which exposed his private parts, and was routinely strip searched up to three times per day absent any legitimate penalogical purpose. His rights were violated because he was strip searched in violation of the Fourth Amendment to the United States Constitution, Article 1 Paragraph 7 of the New Jersey Constitution, and provided clothing which violated his rights under the Eighth Amendment United States Constitution and Article 1 Paragraph 12 of the New Jersey Constitution. Additionally, according to the policies/practices and customs of Salem County, Mr. Snead was strip searched in a non-private public setting in violation of the Fourth Amendment to the United States Constitution, Article 1 Paragraph 7 of the New Jersey Constitution.

7. Defendant County of Salem (the "County") is a county government organized and existing under the laws of the State of New Jersey. At all times relevant hereto, the County, acting through the Salem County Correctional Facility, was responsible for the policies, practices, supervision, implementation and conduct of all matters pertaining to the center and was responsible for the appointment, training, supervision and conduct of all personnel, including those working in the Salem County Correctional Facility. In addition, at all relevant times, the County was responsible for enforcing the rules of the Correctional Facility and for ensuring that detention personnel obeyed the Constitution and laws of the United States and of the State of New Jersey.

**CLASS ACTION ALLEGATIONS**

8. Plaintiffs bring this action pursuant to Rules 23(b)(1), 23(b)(2) and 23(b)(3) of the Federal Rules of Civil Procedure on behalf of himself and a class of similarly situated individuals who were detained in the Salem County Correctional Facility and classified as “suicidal”.

9. The classes that Plaintiffs seek to represent are defined as follows:

All persons who have been or will be placed into the custody of the Salem County Detention Center and were strip searched in a public/non-private setting according to the policies/practices/customs of the County including but not limited to those who were strip searched within a cell, assigned to work in the kitchen and/or were brought to court for a hearing. The Class Period commences on April 6, 2015 and extends to the date on which Salem County is enjoined from, or otherwise ceases, enforcing its unconstitutional and illegal policy, practice and customs as described throughout this Complaint.

All persons who have been or will be placed into the custody of the Salem County Detention Center and were charged with non-indictable offenses and were strip searched in accordance with Salem County’s policies/practices/customs. The class period commences on April 6, 2015 and extends to the date on which Salem County is enjoined from, or otherwise ceases, enforcing its unconstitutional and illegal policy, practice and customs as described throughout this Complaint.

All persons who have been or will be placed into the custody of the Salem County Detention Center and classified as suicidal through the admissions process. The class period commences on April 6 2015 and extends to the date on which Salem County is enjoined from, or otherwise ceases, enforcing its unconstitutional and illegal policy, practice and customs as described throughout this Complaint.

10. This action has been brought and may properly be maintained as a class action under Federal law and satisfies the numerosity, commonality, typicality and

adequacy requirements for maintaining a class action under Fed. R. Civ. P. 23(a).

11. The members of the class are so numerous as to render joinder impracticable. Upon information and belief, there have been hundreds or even thousands of non-indictable detainees who entered the Salem County Correctional Facility and were strip searched prior to admission into general population. Additionally, upon information and belief there have been hundreds if not thousands of people improperly classified as suicidal lacking any basis in fact. These detainees are routinely strip searched, up to three times per day, absent any penalogical purpose. Further, all persons who enter the suicidal unit are issued "turtle suits" which are intended to be closed though Velcro buckles but because of the sheer volume of individuals misclassified, the Velcro has worn, such that the Velcro does not close, exposing the detainees genitals. There are hundreds if not thousands of detainees who have been subject to non-private group setting strip searches and/or strip searches in locations where cameras broadcast the strip search to other locations within the jail.

12. Upon information and belief, joinder of all of these individuals is impracticable because of the large number of class members and the fact that class members are likely dispersed over a large geographical area, with some members presently residing outside of Salem County and this Judicial District. Furthermore, upon information and belief, many members of the class are low-income persons, may not speak English, and likely would have great difficulty in pursuing their rights individually.

13. Common questions of law and fact exist as to all members of the class, including but not limited to:

- a. Did/Does Salem County have a policy custom practice to strip search its detainees in a public non-private setting in front of other detainees and in the

presence of cameras which transmitted images of the strip searches to other locations within the jail?

b. Did/Does Salem County have a policy, custom, or practice to strip search all non-indictable detainees prior to admission into general population?

i. If so does this violate the fourth amendment to the United States Constitution and/or the New Jersey Constitution?

c. Did /Does Salem County have a policy, custom, or practice to classify detainees as suicidal when it knew or should have known that these individuals were not suicidal?

i. If so, were the consequent routine strip searches of those so classified absent a penalogical purpose and as such in violation of the fourth and eighth amendments to the United States Constitution and Article 1 Paragraphs 7 and 12 of the New Jersey Constitution?

d. Did/Does Salem County have a policy, custom, or practice to strip search detainees in a non-private/public setting?

i. If so does this violate the fourth amendment to the United States Constitution and/or Article 1 Paragraphs 7 and 12 of the New Jersey Constitution.

e. Did /Does Salem County have a policy, custom, or practice to provide clothing which would expose the private parts of detainees classified as suicidal?

i. If so, does this violate the eighth amendment to the United States Constitution and Article 1 Paragraph 12 of the New Jersey Constitution?

14. Plaintiffs claims are typical of the claims of the members of the class. Plaintiffs and all members of the class sustained damages arising out of Defendant's course of conduct. The harms suffered by the Plaintiffs are typical of the harms suffered by the class members.

15. The representative Plaintiffs have the requisite personal interest in the outcome of this action and will fairly and adequately protect the interests of the class. Plaintiffs have no interests that are adverse to the interests of the members of the class.

16. Plaintiffs have retained counsel who have substantial experience and success in the prosecution of class action and civil rights litigation. The named Plaintiffs are being represented by Carl Poplar, Esquire, Kevin McCann, Esquire, Shanna McCann, Esquire (Chance & McCann) and William Riback, Esquire.

17. Plaintiffs' Counsel have the resources, expertise and experience to successfully prosecute this action against Salem County. Counsel know of no conflicts among members of the class, or between counsel and members of the class.

18. This action, in part, seeks declaratory and injunctive relief. As such, Plaintiffs seek class certification under Fed. R. Civ. P. 23(b)(2), in that all class members were subject to the same policies and practices as identified above. In short, Salem County acted on grounds generally applicable to all class members.

19. In addition to certification under Rule 23(b) (2), and in the alternative, Plaintiffs seek certification under Rule 23(b)(3).

20. Common questions of law and fact exist as to all members of the class, and predominate over any questions that affect only individual members of the class. These common questions of law and fact are identified above.

21. A class action is superior to other available methods for the fair and efficient adjudication of this controversy, since joinder of all of the individual members of the class is impracticable given the large number of class members and the fact that they are dispersed over a large geographical area. Furthermore, the expense and burden of individual litigation would make it difficult or impossible for individual members of the class to redress the wrongs done to them. The cost to the federal court system of adjudicating thousands of individual cases would be enormous. Individualized litigation would also magnify the delay and expense to all parties and the court system. By contrast, the conduct of this action as a class action in this District presents far fewer management difficulties, conserves the resources of the parties and the court system, and protects the rights of each member of the class.

22. In the alternative to certification under Fed. R. Civ. P. 23(b)(3), Plaintiffs also seek partial certification under Fed. R. Civ. P. 23(c)(4).

### **FACTS**

#### **Facts Applicable to the Class Generally**

23. The Fourth Amendment of the United States Constitution, Eighth Amendment of the United States Constitution and the New Jersey Constitution prohibit the County from:

- 1) performing strip searches of non-indictable detainees prior to their admission to general population;
- 2) performing strip searches of non-indictable detainees upon admission;
- 3) performing strip searches absent privacy/in a public setting;
- 4) conducting strip searches searches absent a penalogical purpose
- 5) providing clothing which fails to provide coverage for private

parts/genitals

24. Upon information and belief, Salem County has instituted a written and/or *de facto* policy, custom or practice of violating detainees rights as identified above.

25. The Salem County knows that it was violating the rights of detainees by implementing policies practices or customs as identified above.

26. The Defendant's written and/or *de facto* policy, practice and customs have been promulgated, effectuated and/or enforced in bad faith and contrary to clearly established law.

27. Pursuant to this written and/or *de facto* policy, each member of the class, including the named Plaintiffs had their rights violated.

28. As a direct and proximate result of the unconstitutional or illegal acts-- each member of the class, including the named Plaintiff -- has suffered or will suffer psychological pain, humiliation, suffering and mental anguish.

#### **Facts Applicable to the Named Plaintiffs**

#### **DANA CLARK-STEVENSON**

29. On or about December 16, 2016 through December 21, 2016 and again on January 19 through January 24, 2017 Ms. Clark-Stevenson was detained in the Salem County detention facility for missing a municipal court date for a non-indictable matter and failing to pay a municipal fine, respectively. On the two respective detentions Ms. Clark-Stevenson was subject to the same policies practice/customs.

30. Despite being brought in on non-indictable matters, and prior to introduction into general population Ms. Clark-Stevenson was subject to a

strip/cavity search.

31. Ms. Clark-Stevenson was then brought to a suicide unit, for no apparent reason, where she was again subject to a second strip search/cavity search.

32. She was issued a "turtle suit" which had Velcro ties which were non-functioning and exposed her breasts and genitals.

33. There was a camera in her cell which transmitted images of her exposed in her turtle suit as described above.

34. Without any penalogical reason, Ms. Clark-Stevenson was again subject to being strip searched/cavity searched 2-3 times per day. These strip searches occurred in her cell which had a glass window where other detainees and male COs could view her being subject to these cavity/strip searches. Further, these strip searches were transmitted via camera which is located in the cell to other locations in the jail.

## **KENNETH FUQUA**

35. In or about July 2016 Mr. Fuqua was arrested at his residence for an outstanding warrant.

36. Mr. Fuqua was handcuffed and transported to Port Norris Barracks at approximately 10:00 a.m. Mr. Fuqua was cooperative for the several hours he was held there.

37. Mr. Fuqua was then transported to the Cumberland County Jail.

38. Mr. Fuqua went through the customary booking policy at Cumberland County Jail including an appropriate suicide screen.

39. Mr. Fuqua was admitted into general population under Cumberland County's customary admissions and classification process because he was not suicidal.

40. Mr. Fuqua spent ten days in Cumberland County Jail without incident.

41. Mr. Fuqua was then transferred to Salem County Jail by the Salem County Sherriff's Department without incident.

42. Mr. Fuqua was then subject to the Salem County Jail admissions process.

43. As part of the Salem County Jail admissions process Mr. Fuqua was interviewed by a Correction's Officer including a suicide screen.

44. The suicide screen consisted of a series of questions designed to determine whether Mr. Fuqua was a danger to himself.

45. Mr. Fuqua provided no basis to believe that he was suicidal and otherwise denied that he was suicidal.

46. Despite Mr. Fuqua not being suicidal, and not exhibiting any suicidal tendency or ideation, he was he was initially housed in a closed custody unit for individuals who are suicidal.

47. Approximately ten other detainees had been classified as suicidal and were being held in this cell.

48. Upon his admission into this Close Custody unit, Mr. Fuqua was made to remove his jail issued jump suit and was in a state of complete undress in the

presence of the entire Close Custody Unit comprising approximately ten other detainees.

49. Mr. Fuqua, in a complete state of undress, was in view of all other detainees within this Close Custody Unit.

50. There was no penalogical purpose in strip searching Mr. Fuqua without privacy.

51. Mr. Fuqua subsequently observed other detainees admitted to this Close Custody unit subject to the same practice of being required to undress in the full view of all other detainees.

52. There was no penalogical purpose in strip searching detainees without privacy.

53. Mr. Fuqua was made to wear a "turtle suit" which was intended to have Velcro closing devices rather than zippers, buttons, belts or any other type of garment closings.

54. Because the Velcro was worn, it failed to adequately and reasonably clothe Mr. Fuqua in that his and all other detainees private parts were exposed on a routine basis.

55. There was no penalogical purpose in denying Mr. Fuqua and other detainees reasonable privacy.

56. Mr. Fuqua, because he was improperly classified as "suicidal" was subject to at least two to three routine strip searches per day which lacked any penalogical purpose.

57. Mr. Fuqua suffered shame and embarrassment as a result of the above mentioned lack of privacy.

58. After three days in this Close Custody unit, Mr. Fuqua was seen by a medical professional who cleared his admission into general population because he was not suicidal.

### **MARK HENDRICKS**

59. In or about August 2015 Mr. Hendricks was assigned to the Kitchen where approximately 10 other detainees were assigned to work.

60. The kitchen's utensils and tools were all secured such that they could not be removed from the kitchen.

61. Further, a count/check was done on all utensils and tools to ensure that these were not removed from the kitchen.

62. Notwithstanding, every instance in which Mr. Hendricks worked in the kitchen, he was required to submit to a strip/cavity search in a public non-private setting in that his co-workers assigned to the kitchen were simultaneously strip/cavity searched in full view of each other.

63. Additionally, when Mr. Hendricks was brought to court, approximately ten times, he was strip searched in the presence of other detainees who were likewise brought to court.

### **DARIUS SNEAD**

64. On or about January 20, 2017 Darius Snead was arrested without incident by the State police for failing to pay a \$250.00 municipal fine.

65. He was brought to the Salem County detention facility because he could not make bail on this \$250.00 municipal fine.

66. Despite being detained for a non-indictable offense, Mr. Snead was subject to being strip/cavity searched immediately upon his admission to the facility.

67. After being dressed in jail issued jump suit, he was subject to a suicide questionnaire.

68. Despite lacking any indication of suicidal tendency or ideation Mr. Snead was classified as suicidal and placed in a suicide unit where he was initially housed in isolation.

69. He was given a "Turtle Suit" which exposed his genitals which became an issue when another detainee was admitted into his cell, wearing the same defective garments.

70. Mr. Snead was then subject to routine strip searches absent any penalogical purpose.

71. Mr. Snead was then seen by a medical professional who asked the same questions of Mr. Snead whereupon he was admitted to general population after several days of being subjected to routine strip searches absent a penalogical purpose.

**CAUSES OF ACTION**

**AS AND FOR A FIRST CAUSE OF ACTION**

**Violation of the Fourth Amendment to the United States Constitution Under Color of State Law – Strip Searching Non-Indictable detainees prior to their introduction into general population**

**-- Unreasonable Search and Failure to Implement Municipal Policies to Avoid Constitutional Deprivations Under Color of State Law –**

72. Plaintiffs incorporate by reference and reallege each and every allegation stated in paragraphs 1 through 71.

73. Under the Fourth Amendment to the United States Constitution it is impermissible to strip search detainees being held on non-indictable offenses prior to their introduction into general population.

74. Salem County had a policy/custom and or practice to strip search non-indictable detainees prior to their introduction into general population.

75. The County additionally had a policy/custom/practice to strip search detainees in a public/non-private setting in violation of the fourth amendment.

76. The County additionally had a policy/custom/practice to strip search detainees absent a penalogical purpose in violation of the fourth amendment.

77. These strip searches were conducted pursuant to the policy, custom or practice of Salem County.

78. This conduct on the part of Defendant represents a violation of 42 U.S.C. § 1983 and the New Jersey Civil Rights Act N.J.S.A. 10:6-2 because the policy and/or custom of strip searching non-indictable detainees was undertaken under color of state law.

79. As a direct and proximate result of the unconstitutional acts described above, Plaintiffs have been irreparably injured and have suffered embarrassment and humiliation.

**AS AND FOR A SECOND CAUSE OF ACTION**

**Violation of Article 7 Paragraph One of the New Jersey Constitution - Under Color of State Law – Strip Searching Non-Indictable detainees upon admission to the jail**

**Unreasonable Search and Failure to Implement Municipal Policies to Avoid Constitutional and Statutory Deprivations Under Color of State Law –**

80. Plaintiffs incorporate by reference and reallege each and every allegation stated in paragraphs 1 through 79.

81. Article 7 Paragraph One prohibits strip searching non-indictable detainees housed in a correctional facility.

82. Salem County is a county correctional facility.

83. Salem County implemented a policy/custom/practice to strip search non-indictable detainees upon their admission into the correctional facility in violation of Article 7 Paragraph One.

84. The County additionally had a policy/custom/practice to strip search detainees in a public/non-private setting in violation of the New Jersey Constitution.

85. The County additionally had a policy/custom/practice to strip search detainees absent a penalogical purpose in violation of the New Jersey Constitution.

86. These strip searches were conducted pursuant to the policy, custom or practice of Salem County.

87. This conduct on the part of Defendant represents a violation of the New Jersey Civil Rights Act N.J.S.A. 10:6-2 because the policy and/or custom of strip searching non-indictable detainees was undertaken under color of state law.

88. As a direct and proximate result of the unconstitutional acts described above, Plaintiffs have been irreparably injured and have suffered embarrassment and humiliation.

**AS AND FOR A THIRD CAUSE OF ACTION**

**Violation of the Fourth, Fourteenth and Eighth Amendments to the United States Constitution**

**-- CONDUCT WHICH THERE IS NO PENALOGICAL PURPOSE IN CONDUCTING ROUTINE STRIP SEARCHES OF DETAINEES**

89. Plaintiffs incorporate by reference and reallege each and every allegation stated in paragraphs 1 through 88.

90. All detainees who were housed in the Close Custody Unit were subject to routine strip searches while being locked down for 23 hours per day.

91. There was no factual basis for conducting routine strip searches of these detainees insofar as the County knew or should have known that these detainees were not suicidal.

92. The routine strip searches of detainees who were housed on the suicide unit without any basis lacked any penalogical purpose and so violated and violates the fourth, eighth and fourteenth amendments to the United States Constitution.

93. This conduct on the part of Defendant represents a violation of 42 U.S.C. § 1983 and the New Jersey Civil Rights Act the New Jersey Civil Rights Act N.J.S.A. 10:6-2 because the policy and/or custom of routinely strip searching detainees absent penalogical purpose was undertaken under color of state law.

94. As a direct and proximate result of the unconstitutional acts described above, Plaintiffs have been irreparably injured and have suffered embarrassment and humiliation.

**AS AND FOR A FOURTH CAUSE OF ACTION**

**Violations of the Fourteenth and Eighth Amendments to the United States Constitution and Article One Paragraph 12 of the New Jersey Constitution**

**FAILING TO PROVIDE ADEQUATE AND REASONABLE CLOTHING**

95. Plaintiffs incorporate by reference and reallege each and every allegation stated in paragraphs 1 through 94.

96. All detainees who were housed on the suicidal unit were required to wear a “Turtle Suit” which was designed to close by Velcro but because of the sheer number of those classified as suicidal, the Velcro was worn and non-functioning – such that the suit failed to close – exposing the detainees genitals.

97. The Turtle Suits were intended to be closed by Velcro but because of wear and tear the Velcro on the suits failed to meet their purpose resulting in the detainees private parts being exposed.

98. The Eighth and Fourteenth Amendments to the United States Constitution and Article One Paragraph Twelve requires the County to provide detainees clothing which meets basic standards of decency which as described above the county failed in its constitutional obligation.

99. There was no penalogical purpose in embarrassing and humiliating the detainees in this way.

100. This conduct on the part of Defendant represents a violation of 42 U.S.C. § 1983 and the New Jersey Civil Rights Act because the policy and/or custom of issuing defective and exposing clothing in the Close Custody Unit was undertaken under color of state law.

101. As a direct and proximate result of the unconstitutional acts described above, Plaintiffs have been irreparably injured and have suffered embarrassment and humiliation.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs, on behalf of themselves and on behalf of others similarly situated, request that this Court grant them the following relief:

1. An order certifying this action as a class action pursuant to Fed. R. Civ. P. 23.
2. A judgment against Defendant awarding compensatory damages to Plaintiffs and each member of the proposed class in an amount to be determined by a Jury and/or the Court on both an individual and a class wide basis.
3. A declaratory judgment against Defendant declaring Salem County's policies, practices and customs to be unconstitutional and/or violations of their rights.
4. A preliminary and permanent injunction enjoining Salem County from continuing the unconstitutional/illegal policies, practices and customs to be unconstitutional and/or violations of their rights.

5. A monetary award for attorney's fees and the costs of this action.
6. All other relief which is just and proper.

Respectfully submitted by:

Dated: April 6, 2017

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**ATTORNEYS FOR PLAINTIFFS AND  
PROPOSED CLASS**

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Lawsuit Claims Salem County Denied Detainees' Constitutional Rights](#)

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