

**UNITED STATES FEDERAL COURT
FOR THE DISTRICT OF NEW JERSEY
CIVIL DIVISION**

RECEIVED-CLERK
U.S. DISTRICT COURT

2005 JAN -6 P 1:46
*&8. Complaint, Petition, Declairation, and/or Notice Of Intent to Sue--
Allegations Jail conditions and actions by officers and officials amounting to
cruel and unusual punishment.*

*&61. Complaint in federal court--Civil Rights Act--Class action by
prisoners--Prison conditions amounting to cruel and unusual punishment--
Against The Warden, Staff, and Government Officials.*

1. Plaintiffs are citizens of the United States of America and are prisoners in the Camden County Jail, State of New Jersey.

2. Defendant Eric Taylor is now, and at all times material to this action was, a resident of the County of Camden, State of New Jersey, and the duly elected, qualified, and acting Warden of Camden County Jail, State of New Jersey.

3. Defendants Deputy Warden Loberto, Mayor Fazon, Governor Mc Greevey, Acting Governor Codey, Freeholder Liason Joseph Ripa, and Captains, Lieutenants, Sargents, Correctional Officeers, and Staff are residents of the County of Camden, State of New Jersey, and the duly elected, qualified, and acting members of the states government and corrections offices.

4. This action arises under the United States Constitution, particularly under the provisions of the Sixth, Eighth, and Fourteenth Amendments to the Constitution of the United States, and under federal law, particularly the Civil Rights Act, > Title 42 of the United States Code, Section 1983.

5. This court has jurisdiction of this cause under and by virtue of > Title 28 of the United States Code, Section 1343.

6. This action is brought on behalf of plaintiffs individually and as representatives of a class of persons who either are or may be confined to the Camden County Jail; the number of such persons exceeds 1900 and, therefore, is so numerous as to make it impracticable to bring them all before the court.

7. There are questions of law or fact presented in this action which are common to the entire class of persons represented by plaintiffs, and plaintiffs' claims, as set forth below, are typical of the claims of all of the members of the class; plaintiffs are entitled to, and will, fairly and adequately protect the interests of each and all of the members of the class.

8. Each and all of the acts of defendants alleged in this action were done by defendants, and each of them, not as individuals, but under the color and pretense of the statutes, ordinances, regulations, customs, and usages of the County of Camden, State of New Jersey, and under the authority of their offices as Wardens, State Officers and Officials.

9. Camden County Jail, which is being operated and maintained by defendants pursuant to state law, was built in 1988, and was designed for a capacity of 600 to 1200. The present population averages 1900. The cells are 6 feet by 9 feet, which were designed to hold 1 person, 1 bunk, now hold as many as 4 people, 2 bunks, which prisoners have to sleep on the floor. Plaintiffs are required to do 7 days an orientation pod being locked in a cell occupied by 4 people for 23 hours and 40 minutes a day.

10. The plumbing system in the jail is antiquated, with the result that many toilets do not work, and sometimes overflow, to the injury of prisoners required to sleep on the floor. Variations in temperature and water pressure render the few showers useless.

11. Prisoners are furnished with no clothing and inadequate facilities for washing their own clothing. When personal clothing is sent to laundry, it is many times stolen. They are furnished one blanket, often dirty. They are permitted to shave 1 time per week. But many times are deprived of that.

12. Food storage conditions fail to comply with health regulations in the following particulars: Keeping the food fresh and eatable. Dishwashing facilities do not meet health standards in the following particulars: Trays and glasses are dirty when food is served to plaintiffs.

13. Meals served are inadequate in quality and quantity. Average calorie level is 1500 per day, while the average daily requirement for sedentary male or female is 2400.

14. Health care services consist only of a nurse on duty in the daytime and a physician who comes 1 afternoons a week. A visiting dentist performs only extractions. There is no facility for the isolation of prisoners who are ill, even with contagious diseases. Plaintiffs are placed into population with plaintiffs whom have contracted Staff Disease (boils), Tuberculosis, and Hepatitis. Plaintiffs are not afford the opportunity to clean or disinfect cells because staff will not furnish cleaning supplies period.

15. There are no facilities or personnel for social services, which answer request slips, reading, rehabilitation, or any other human resources to meet human needs.

16. By reason of the manner in which defendants operate and maintain Camden County Jail, plaintiffs have been and are now subjected to unhealthy and unsafe living conditions, including severe overcrowding, inadequate sanitary and health facilities, inadequate food service facilities and diet, and the imposition of discipline without due process of law. And have created customs that threaten the safety of the Plaintiffs. By causing inmate on inmate assaults.

17. On November 12, 2004, The Plaintiffs were subjected to a facility shakedown. During which the plaintiffs were subjected to corporal punishment. The Defendants' designees yelled and screamed at Plaintiffs, slamming them to the ground punching and kicking them, and throwing them into walls. Plaintiffs are subjected to the abuse of correctional officer and medical staff coming to work under the influence of legal and illegal controlled substances, Which is causing a very unsafe and unprofessional atmosphere here.

18. The conduct of defendants has deprived, and continues to deprive, plaintiffs of their rights to counsel under the Sixth Amendment of the United States Constitution, has subjected them to cruel and unusual punishment in violation of the Eighth Amendment to the United States Constitution, and has denied them due process of law in violation of the Fourteenth Amendment to the United States Constitution. Because of the foregoing, plaintiffs have no adequate remedy at law, are suffering and will continue to suffer great and irreparable loss, damage, and injury, and are compelled to go into this court of equity for relief.

Date: 11-21-04

Signature: *Corrie Dittimus-Rey* ^(Initiating Plaintiff)
Corrie Dittimus-Rey
 A-K-A
Corrie Ravenell #148892
 D-K-A
Derrick Anderson #99604 (Colorado)
OTHER PLAINTIFFS IN CLASS ACTION

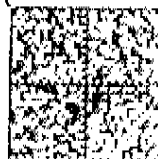
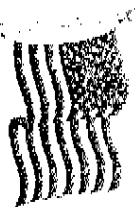
*THE DEFENDANTS NAMES ARE THE NAMES
 KNOWN TO THE PLAINTIFFS. STAFF REFUSE TO GIVE
 FULL NAMES FOR THE PURPOSE OF THIS ACTION.

Steven Unruh #141287 Edward Lopez #147962
 Donald L. Rube #138185
 Patrick Kelly #141956
 Howard Booth #143197
 Edwards McLoughlin #140768
 Melvin Clark #132010
 Fred Mosley #147078

NAME Dennick Anderson

ADDRESS ADAMS COUNTY DETENTION FACILITY

150 North 19th Avenue
Brighton, CO 80601-1951



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DEC 31 2004

ATT: Clerk of the Court

Federal Courthouse / U.S. Courthouse

1 John F. Kennedy Plaza

Camden, N.J. 08101

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