

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

---

**Albert W. Florence,**  
**Plaintiff,**

**-against-**

**Board of Chosen Freeholders of the County of  
Burlington; Burlington County Jail; Warden Juel  
Cole, Individually and officially as Warden of Burlington  
County Jail; Essex County Correctional Facility; Essex  
County Sheriff's Department; John Does 1-3 of Burlington  
County Jail who performed the strip searches Individually  
and officially; John Does 4-5 Individually and officially; &  
John Does 6-8 of Essex County Correctional Facility  
who performed the strip searches, Individually and officially,**

**Defendants.**

---

**Case No. 05-3619(JHR)**

**FIRST AMENDED  
CIVIL COMPLAINT  
ADDING CLASS-ACTION CLAIM  
TO COUNT THREE HEREIN**

**Jury Trial Demanded**

**Jurisdiction**

1. Plaintiff Albert W. Florence brings this action against Defendants to redress the deprivation of rights secured him by the *Fourth, Fifth, Eighth, and Fourteenth* Amendments to the United States Constitution, 42 U.S.C. §§1983,1985 & 1986.
2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§1331, 1332, and 1343(a)(3), and 42 U.S.C. §1983. The matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs.
3. Venue is proper in this District pursuant to 28 U.S.C. §1391 as the cause of action occurred in this District.

**Parties**

4. At all times mentioned herein, Plaintiff was a resident of Middlesex County, New Jersey.
5. At all times mentioned herein, each Defendant was and is, upon information and belief, a citizen of New Jersey.
6. At all times hereinafter mentioned, the Defendant Board of Chosen Freeholders of the County of Burlington was a body corporate and politic of the State New Jersey operating and existing under the laws of the State of New Jersey, and located in the County of Burlington in said State and operating and overseeing Defendant Burlington County Jail.
7. At all times hereinafter mentioned, Defendant Warden Juel Cole was in charge of operating the Burlington County Jail and managing and supervising the personnel thereat, including John Does 1-5 who were officers and or employees of Defendant Burlington County Jail. These Defendants are being sued in the individual and official capacities.

8. At all times hereinafter mentioned, Defendant Essex County Sheriff's Department was in charge of transporting Plaintiff to Essex County for a hearing.
9. At all times hereinafter mentioned, Defendant Burlington County Jail operated under State law and incarcerated Plaintiff and subjected Plaintiff to strip searches by its employees John Does 1-5. These Defendants are being sued in the individual and official capacities.
10. At all times hereinafter mentioned, Defendant Essex County Correctional Facility operated under State law and incarcerated Plaintiff and subjected Plaintiff to strip searches by its employees John Does 6-8.
11. Defendants John Does 4-5 were officers and employees of Defendant Burlington County Jail who ignored Plaintiff's protests of innocence and discriminated against Plaintiff based on his race while he was incarcerated at Defendant Burlington County Jail. These Defendants are being sued in the individual and official capacities.
12. At the time of the alleged incident and at all times pertinent hereto, Defendants acted under color of law, of a statute, ordinance, regulation, custom, or usage in the State of New Jersey and sometimes beyond that scope.

#### **Facts**

13. On or about March 3, 2005, at about 7:30 p.m. Plaintiff Albert, a Black male, was a passenger in his vehicle, a BMW X5 Sports Utility vehicle, being driven by his wife, Plaintiff April, a Black female, who was 7 months pregnant, with their 4 year old son seated in the back.
14. Plaintiff's vehicle was stopped about 2 miles on the 295 Southbound from Exit 46, by a State Trooper who directed Plaintiff to exit the vehicle and arrested him based upon an Essex County warrant.
15. At all times during this stop and arrest, Plaintiff Albert repeatedly told the State Trooper that the warrant was satisfied and he should not be the subject of an arrest and offered proof of a certified letter dated October, 2004 with a raised seal from the State of New Jersey that all judgments against Plaintiff were satisfied and no warrant existed against him.
16. After the State Trooper radioed headquarters, he handcuffed and arrested Plaintiff Albert while his 4 year old son and pregnant wife watched him cuffed and taken away.
17. Plaintiff was transported to and processed at Burlington County Jail by a full strip and cavity search. Plaintiff was imprisoned at Burlington County Jail for 6 days and nights.
18. At all times while imprisoned at the Burlington County Jail, Plaintiff Albert repeatedly told jail personnel that the warrant was satisfied and he should not be the subject of an arrest and offered proof of a certified letter dated October, 2004 with a raised seal from the State of New Jersey that all judgments against Plaintiff were satisfied and no warrant existed against him.
19. At all times during the detention, Defendant Juel Cole was the Warden of the Burlington County Jail.

20. At all times during the detention, Defendant Warden Cole was charged with the care and custody of all inmates including Plaintiff.
21. At all times during the detention, Warden Cole was the supervisor of the personnel at the Burlington County Jail and had knowledge of Plaintiff's protests that he was unlawfully arrested and detained.
22. During all the time Plaintiff was imprisoned at Burlington County Jail, there was a magistrate competent, willing, able, and ready to have Plaintiff taken before him or her. During that entire time, the magistrate was accessible and available, and Plaintiff was physically and mentally in a condition to be brought before the magistrate.
23. During the entire time of Plaintiff's imprisonment at Defendant Burlington County Jail, he was refused access to the phone, refused access to the shower, refused a kit that would have contained a tooth brush, towel and soap and refused permission to talk to a social worker. When Plaintiff requested any of those services, the Defendant officers John Does 4-5 denied him, stating that he was a "holdover."
24. At all times relevant herein, the white inmates at Burlington County Jail were given towels, toothbrushes, toothpaste, showers, phone calls, soap, and toilet paper but Plaintiff, who was Black, was denied these basic needs.
25. Plaintiff hired an attorney and paid \$1,000.00.
26. After the 6th night at Defendant Burlington County Jail, the Defendant Essex County Sheriff's Department transported Plaintiff to Essex County Correctional Facility where Plaintiff was processed again by a full strip and cavity search, fingerprinted and photographed then placed in a cell with the general population.
27. Plaintiff was imprisoned at Defendant Essex County Jail for 24 hours.
28. Plaintiff was imprisoned at both Defendants Burlington County Jail and Essex County Jail for a total of 7 days from March 3, 2005 to March 10, 2005.
29. On the 7th day, Hon. Michael Casale, Judge of the Superior Court dismissed the charges against Plaintiff based on the fact that the warrant against Plaintiff did not exist and there was no cause for the arrest.

**Count One: §1983 Unlawful Arrest**

30. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 30.
31. Defendant Burlington County Jail is run and operated by the State of New Jersey.
32. Defendants Burlington County Jail arrested Plaintiff Albert without probable cause.
33. Charges were never officially filed against Plaintiff.
34. By reason of said unlawful arrest while Defendants acted under color of state or territorial law, Plaintiff was deprived of his federal rights to liberty and freedom.

**Count Two: §1983 False Imprisonment**

35. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 35.
36. Defendants Burlington County Jail, Burlington County Board of Chosen Freeholdres, Warden Juel Cole, and John Does 1-8, Essex County Correctional Facility and Essex County Sherriff's Department falsely imprisoned Plaintiff based on detaining him first at Burlington County and keeping him there for 6 days and making him wait until Defendant Essex County Sherriff's Department picked him up the seventh day and detained him in Essex County Correctional Facility when no arrest warrant existed and despite Plaintiff's protests and proof no warrant existed.
37. By reason of said false imprisonment while Defendants acted under color of state or territorial law, Plaintiff was deprived of his federal rights to liberty and freedom.

**Count Three: §1983 4th Amendment-Unlawful Strip Body Search  
And CLASS ACTION ALLEGATIONS**

38. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 38.
39. The Plaintiff brings this action under Rules 23(a) and 23(b)(1-3) the Federal Rules of Civil Procedure on behalf of himself and a class consisting of each person who, in the **two years** preceding the filing of this action up until the date this case is terminated, was or will be, (i) upon being arrested, processed and committed into the Burlington County Jail or the Essex County Correctional Facility (ii) on a charge other than a charge of drugs, weapons or felony violence; and (iii) was and is subjected to a blanket strip search without any individualized finding of reasonable suspicion or probable cause that he or she was concealing drugs, weapons or other contraband.
40. Certification of a class under Federal Rule of Civil Procedure 23(b)(2) is appropriate because Burlington County Jail and Essex County Correctional Facility have a policy, and engage in a pattern and practice of conduct that has uniformly affected all members of the class.
41. Injunctive relief against Defendants to enjoin the practice will benefit the Plaintiff and each and every class member unlawfully strip searched at the Essex County Correctional Facility and Burlington County Jail.
42. The class is entitled to injunctive relief of terminating the above described policy and practice of subjecting arrestees to blanket strip searches without any individualized finding of reasonable suspicion, or probable cause that he or she was concealing drugs, weapons or other contraband.
43. Certification of a class under Federal Rule of Civil Procedure 23(b)(3) is also appropriate in that common questions of law and fact predominate over any individual questions. A class action is far superior for the fair and efficient adjudication of this controversy as detailed below.
44. Regarding Plaintiff and members of the class, there are no individual questions on the issue of

liability. Every arrestee committed into the Burlington County Jail and Essex County Correctional Facility is subjected to blanket strip searches. Defendants Burlington County Jail and Essex County Correctional Facility possess records of these searches via (a) Burlington County Jail's Strip Search Authorization forms evidencing no reasonable suspicion of drugs, contraband or weapons nor an indictable offense committed and other records, booking records and computer input and (b) Essex County Correctional Facility's records, booking records and computer input; therefore, by their own records and procedures, Defendants can not deny that any of the searches were not conducted based on an individual determination of reasonable suspicion. Should records exist demonstrating an individualized suspicion, such people would, by definition, not be members of the class.

45. Among the questions of law and fact common to the class are:
  - a) whether Defendants Board of Chosen Freeholders of the County of Burlington and/or Joel Cole and Defendants Essex County Correctional Facility instituted a policy or acquiesced in a custom and practice of subjecting arrestees committed to the Burlington County Jail and Essex County Correctional Facility pending presentment to blanket strip searches without an individualized determination that the arrestees were in possession of drugs, weapons or other contraband;
  - b) whether such policy or practice, if found to exist, violates the Fourth or Fourteenth Amendment, and whether such a written and/or de facto policy existed during the Class period.
46. Defendants Burlington County Board of Chosen Freeholders, Burlington County Jail and Cole, through its agents, had notice of the strip searches before the class period through communications with county agents, inmates and other methods that they maintain a blanket policy of directing.
47. Defendants Burlington County, Warden Joel Cole, Burlington County Jail and Essex County Correctional Facility have within their records the names and addresses of all current and past class members. This information is maintained in the Burlington County Jail and Essex County Correctional computer systems ( Mainframe), logbooks, Booking Records and other paper records maintained by those Defendants.
48. The class is so numerous that joinder of all members is impracticable. The exact number of class members is unknown to Plaintiff at this time. However, every week at least 50 persons are strip and body cavity searched under a blanket strip search policy upon being committed into the Burlington County Jail and Essex County Correctional Facility pending presentment. All are subject to the illegal searches. Thus, this class well exceeds 10,000 members.
49. Joinder of all these individuals is impracticable because of the large number of Class members and the fact that Class members are probably dispersed over a large geographical area, with some members, including Plaintiff, residing outside of Burlington and Essex Counties and this Judicial District. Furthermore, many Class members most probably are low income persons,

may not speak English, may not know of their rights and would have difficulty in pursuing their rights individually. Thus, the expense and burden of individual litigation would make it difficult or impossible for individual Class members to redress the wrongs they suffered. The cost to the federal court system of adjudicating thousands of individual cases would be enormous. Individualized litigation would magnify the delay and expense to all parties and the court system. By contrast, to proceed via 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.

50. The Plaintiff's claims are typical of the claims of the class members because the Plaintiff, and all other members of the class, were injured by exactly the same means- blanket strip searches.
51. The Plaintiff will fairly and adequately protect the interests of the members of the class. Plaintiff has retained competent and experienced counsel in both federal civil rights and class action litigation, with criminal defense knowledge and experience applicable to this case.
52. Susan Chana Lask, Esq. is an experienced civil rights litigator and criminal defense counsel who handled nationwide class actions, including multi-million dollar complex Federal Hazardous Waste Litigation involving numerous government agencies starting with her work in 1986 with the preeminent national firm of Rivkin, Radler, Dunne and Bayh (working with New York's then senators and partners Senators Dunne & Bayh) in the chemical warfare Agent Orange case against Morton Thikol, the chemical creosote pollution case against James Graham Brown Foundation in Kentucky, Alabama and Florida, the existence of PCB pollutants in the Hudson River, working in Los Angeles with class action counsel against Taco Bell for laborers' wages and her successful work with attorney general's nationwide and other government agencies in bringing a successful settlement of the class action RICO suit against Miss Cleo. Also, she settled a class action for New York City drivers wherein the City of New York changed traffic violation procedures and law upon Ms. Lask demonstrating class members were being ticketed under a law that did not exist. In 1995 she handled an international white collar criminal case involving complicated air traffic laws leading the news media to follow Ms. Lask's work worldwide. She was counsel to a Lloyd's of London agent in New York investigating and litigating worldwide multi-million dollar freight losses. Ms. Lask's law offices joined with Michael Calabro, Esq. in this civil rights case because of his background as a former New Jersey Detective and a New Jersey, Essex County prosecutor because his experience is pertinent to this litigation when split second information regarding New Jersey police and jail procedure are needed, as well as Mr. Calabro's credentials include his being a certified New Jersey Trial Counsel and criminal defense attorney. Finally, Ms. Lask was recently admitted to the United States Supreme Court, an honor extended to counselors with impeccable records. Together, Ms. Lask and Mr. Calabro have an excellent reputation without so much of a sanction in their records of some 20 years each of law practice, and their commitment to excellence and

ethics in the Bar commits them to obtain the best and most fair settlement for every class member, and insure the Class receives justice and their appropriate damages. In sum, the collaboration of both law offices and their staff and resources will adequately protect the class interests during litigation and upon settlement and thereafter..

53. The Plaintiff has no interests contrary to, or in conflict with, those of the class.
54. The Plaintiff knows of no difficulty that will be encountered in the management of this litigation that would preclude its maintenance as a class action. The class action is superior to any other available means to resolve the issues raised on behalf of the Class. The class action will be manageable because so many different records systems exist from which to ascertain the members of the putative class. Damages can be determined on a classwide basis using a damages matrix set by a jury, or by trying the damages of a statistically valid sample of the class to a jury and extrapolating those damages to the class as a whole.
55. Class treatment will be superior because liability can be determined on a classwide basis. Damages can also be determined on a classwide basis through use of statistical sampling.

#### ***FACTS REGARDING THE CLASS ACTION***

56. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 56.
57. The Fourth Amendment of the United States Constitution prohibits state officials, such as the Defendants in this action and the employees they supervise, from performing blanket strip searches of arrestees who have been charged with misdemeanors or other minor crimes or violations and/or detainees as holdovers on warrants from other jurisdictions unless there exists a reasonable suspicion to believe that the arrestee/detainee is concealing a weapon or contraband.
58. Nonetheless, Defendants have instituted a written and/or de facto policy, custom or practice of strip searching all individuals who enter the custody of their Correctional Facilities regardless of the nature of their charged crime and without the presence of reasonable suspicion to believe that the individual was concealing a weapon or contraband.
59. Defendants have instituted a written and/or de facto policy, custom or practice of conducting visual body cavity searches (visual inspection of the vaginal and rectal cavities) upon all persons entering the custody of the Correctional Facilities, regardless of the individual characteristics or the nature of their charged crime. For purposes of this Complaint, strip and visual cavity searches are collectively referred to as "strip searches."
60. Defendants know or should know, that they may not institute, enforce or permit enforcement of a blanket policy or practice of conducting strip searches without particularized, reasonable suspicion.
61. Defendants' written and/or de facto policy, practice and custom mandating blanket strip searches of all arrestees has been promulgated, effectuated and/or enforced in bad faith and



contrary to clearly established law.

62. Reasonable suspicion to conduct a strip search may only emanate from the particular circumstances in advance to the search, being the nature of the crime charged, the particular characteristics of the arrestees, and/or the circumstances of the arrest.
63. Defendants have promulgated, implemented, enforced, and/or failed to rectify a written and/or de facto policy, practice or custom of strip searching all individuals placed into their Correction Facilities without any requirement of reasonable suspicion, or any suspicion of any sort. This written and/or de facto policy made the strip searching of pretrial detainees routine; neither the nature of the offense charged, the characteristics of the arrestee, nor the circumstances of a particular arrest were relevant to the enforcement of the policy, practice and custom of routine strip searches.
64. Pursuant to this written and/or de facto policy, each Class member, including Plaintiff, were victims of a blanket strip search upon their entry into Defendants' Correctional Facilities.
65. As a direct and proximate result of the unlawful strip search conducted pursuant to this written and/or de facto policy, the victims of the unlawful strip searches are each Class member, including Plaintiff, whom have suffered or will suffer psychological pain, humiliation, physical pain and mental anguish.
66. Defendants John Does' 1-3 of Burlington County Jail and Essex County Correctional Facility performed the illegal strip searches.
67. None of the officers involved in the searches of Plaintiff or any Class member bore any suspicion, reasonable or otherwise, that Plaintiff or any Class member was concealing a weapon or contraband at the time of the searches, and indeed, no reasonable basis existed for such a suspicion, given the nature of the alleged offense
68. The strip/body cavity searches of Plaintiff and the Class members were unconstitutional.
69. Defendants are liable for exemplary damages as the strip body searches were completely unreasonable and senseless under the law.

#### **Count Four: §1985(3) Discrimination**

70. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 69.
71. Defendants John Does 4-5 of Defendant Burlington County Jail conspired to violate Plaintiff Albert's statutory civil rights by acting in concert to deny his requests for 6 days access to the phone, access to the shower, a kit that would have contained a tooth brush, towel and soap and permission to talk to a social worker.
72. Defendants denials were motivated by a racial discriminatory animus designed to deprive, directly or indirectly, any Black person to the equal protection of the laws.
73. Plaintiff suffered injury of humiliation and other personal indignities to be the only Black prisoner among the white prisoners without any hygiene and the only Black prisoner refused



basic needs of even a shower or a toothbrush for 6 days while the White prisoners were afforded those basic needs.

**Count Five: §1986 Discrimination**

74. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 73.
75. Defendants John Doe 4-5, Burlington County Jail and Juel Cole knowing that a violation of section 1985(3) is about to be committed and possessing the power to prevent its occurrence, failed to take action to frustrate its execution for the whole 6 days that the violation continued at the Burlington County Jail.

**Count Six: Fourth Amendment Unreasonable Detention**

76. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 75.
77. Defendant Burlington County Jail did not promptly bring Plaintiff to a Magistrate but instead unreasonably incarcerated him for 7 days.
78. Rule R.3:41(c) of the New Jersey Rules Governing Criminal Practice mandates that the arresting officer in charge of the police station where the arrestee is taken shall promptly complete his post arrest documentation and "release that person in lieu of continued detention." to the nearest magistrate for a probable cause hearing.
79. Despite even State law requiring a prompt hearing, Plaintiff's constitutional rights of being detained for an unreasonable time were violated as a result of being imprisoned some 7 days while Defendants ignored Plaintiff's protests that a warrant for his arrest did not exist.

**Count Five: §1983 Municipality Custom Violations**

80. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 79.
81. Defendants Burlington County Jail, Burlington County Board of Chosen Freeholders, Essex County Correctional Facility and Essex County Sheriff's Department and Warden Juel Cole maintained a municipal policy or custom of detaining persons without promptly verifying if a proper warrant for arrest existed nor promptly doing anything to insure a person's liberty is not impeded by being falsely arrested.
82. Those practices of the Defendants, who are government entities, are so permanent and well settled as to constitute a custom or usage with the force of law.
83. Defendants are liable under respondeat superior liability under § 1983 as their custom or usage supports conduct violative of Plaintiff's federal constitutional rights,
84. Defendants had contemporaneous knowledge of the offending incident or knowledge of a prior pattern of similar incidents and circumstances.
85. Defendants failed to train, discipline or control its personnel and that is a basis for §1983

respondeat superior liability.

86. Defendants actions or inactions communicates a message of approval to the offending subordinate Defendants John Does 1-8.
87. By reason of Defendants practices related herein, Plaintiff was injured in body and mind, was prevented from following his customary pursuit in his usual occupation, has suffered greatly in his credit and reputation, and has expended large sums of money in his defense.
88. Defendants failure to provide adequate training and supervision to its police officers and employees constitutes a willful and wanton indifference and deliberate disregard for human life and the rights of private citizens, including Plaintiff. Plaintiff is thus entitled to exemplary damages.

#### **DECLARATORY JUDGMENT**

89. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 97.
90. Plaintiff and the Class members request that this Court issue a declaratory judgment, and that it declare the strip search policies of the Defendants to be unconstitutional.

#### **Damages**

91. As a direct and proximate result of the actions on the part of the Defendants, Plaintiff Albert lost one week from work and lost a salary of about \$4,900.00 in commissions, lost his freedom for 7 days, missed his mother's birthday on March 9, 2005 during the imprisonment, feared his wife would lose their baby because she had a premature birth before, during his imprisonment Plaintiff cried everyday, was terrified, could not eat or drink, did not sleep, was dizzy, nauseous, was in unsanitary conditions in the cell with the toilet being near his head where he slept, the food was cold and disgusting, suffered headaches, stomachaches, felt he was losing his mind while everyone ignored the fact that there was no warrant against him, was literally humiliated by the strip and cavity searches and more, feared losing his job, his home and his baby, Plaintiff presently has anxiety and fears every time he sees a police officer that he will get arrested again, sleeplessness, replays the whole event over and over in his mind.
92. Defendants failure to provide adequate training and supervision to its police officers and employees constitutes a willful and wanton indifference and deliberate disregard for human life and the rights of private citizens, including Plaintiff and all Class members. Plaintiff and the Class members are thus entitled to exemplary damages.

#### **DEMAND FOR TRIAL BY JURY**

93. The Plaintiffs hereby demand a trial by jury.

WHEREFORE, Plaintiff Albert Florence, on behalf of himself and the Class of others similarly

situated, request that this Honorable Court grant the following relief:

A. An order certifying the cause of action number three of this complaint as a class action pursuant to Fed. R.Civ.P. 23 with Plaintiff Florence as Class representative.

B. A judgment against all Defendants, jointly and severally on Plaintiff's third Cause of Action detailed herein, awarding Compensatory Damages to the Plaintiff 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.

C. A judgment against Policy Making Defendants on Plaintiffs' First and Second Causes of Action for punitive damages in an amount to be determined at trial.

D. A declaratory judgment against Burlington County Board of Chosen Freeholders, Burlington County Jail, and the Essex County Correctional Facility declaring their policy, practice and custom of blanket strip and visual cavity searching detainees entering those facilities, regardless of the crime charged or suspicion of contraband and absent particularized, reasonable suspicion that the arrestee subjected to the search is concealing weapons or other contraband to be unconstitutional and improper.

E. A monetary award for attorney's fees and the costs of this action, pursuant to 42 U.S.C. s 1988 and Fed. R.Civ.P. 23.

F. One Million Dollars compensatory damages in favor of Plaintiff regarding his individual claims herein;

G. One Million Dollars exemplary damages in favor of Plaintiff regarding his individual claims herein ;

and

H. such other and further relief as the court may deem appropriate.

/s Michael Calabro

Dated: Newark, New Jersey  
June 30, 2006

---

BY: Michael Calabro, Esq.  
ATTORNEYS FOR PLAINTIFF  
Susan Chana Lask, Esq.  
Michael Calabro, Esq.  
466 Bloomfield Ave, Suite 200  
Newark, New Jersey 07107  
(973) 482-1085

**Case No. 05-3619(JHR)**

**Year 2005**

***UNITED STATES DISTRICT COURT***

***DISTRICT COURT OF NEW JERSEY***

---

**Albert W. Florence,**

**Plaintiff,**

**-against-**

**Board of Chosen Freeholders of the County of Burlington; Burlington County Jail; Warden Juel Cole, Individually and officially as Warden of Burlington County Jail; Essex County Correctional Facility; Essex County Sheriff's Department; John Does 1-3 of Burlington County Jail who performed the strip searches Individually and officially; John Does 4-5 and officially; & John Does 6-8 of Essex County Correctional Facility who performed the strip searches, Individually and officially,**

**Defendants.**

---

***FIRST AMENDED COMPLAINT***

---

Attorneys for Plaintiff  
SUSAN CHANA LASK, Esq..  
Michael Calabro, Esq.  
466 Bloomfield Ave, Suite 200,  
Newark, New Jersey 07107  
(973) 482-1085

---