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West New York, New Jersey 07093  
Attorney for Plaintiff  
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Fax: 201-869-9898  
Email: mario@blanchlegal.com

LEONARD FILIPOWSKI  
  
Plaintiff,  
  
v.  
  
BRIAN STACK (IN HIS CAPACITY AS  
MAYOR), UNION CITY POLICE DEPARTMENT,  
UNION CITY BOARD OF COMMISSIONERS ,  
JOHN DOES 1-99, ABC CORPS. 1-99  
  
Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
HUDSON COUNTY  
DOCKET NO:

Civil Action

**ORDER TO SHOW CAUSE WITH  
TEMPORARY RESTRAINTS**

THIS MATTER being brought before the Court by the Law Offices of Mario M. Blanch, Esq., attorney for Plaintiff, seeking relief by way of Order to Show Cause with Temporary Restraints and it appearing Defendants that had notice of this application and for good cause shown:

It is on this \_\_\_\_ day of \_\_\_\_\_, 2024

ORDERED that defendants, appear and show cause before the Superior Court at the Hudson County Courthouse before at \_\_\_\_ o'clock in the \_\_\_\_ noon or as soon thereafter as counsel can be heard, on the \_\_\_\_\_ day of \_\_\_\_\_, 2024 why an order should not be entered:

1 Enjoining the Defendants from interrupting the Plaintiff from speaking at public meetings during the five (5) minutes allocated to public discourse;

2 Enjoining Defendants from filing criminal complaints against the Plaintiff seeking to stifle his First Amendment Rights;

3 Compelling the Plaintiffs to file all criminal complaints before a neutral magistrate for probable cause hearings;

4 Enjoining Defendants from preventing the Plaintiff from exercising his First Amendment Rights at public meetings;

5 Enjoining Defendants from arresting the Plaintiff for his assertion of First Amendment rights.

6 Consolidating all of Plaintiff's various criminal complaints and submitting them for a probable cause hearing before a neutral magistrate;

7 For an order compelling the Defendants to pay the Plaintiff's reasonable legal fees and costs;

8 For any other relief the Court deems just and proper.

AND IT IS FURTHER ORDERED THAT PENDING THE RETURN OF THE ORDER TO SHOW CAUSE, DEFENDANTS ARE HEREBY ORDERED:

A. Pending the return date of the Order to Show Cause, Defendants are temporarily enjoined from interrupting the Plaintiff from speaking at public meetings during his allocated five (5) minutes, which is provided to each person during the session.

B. Pending the return date of the Order to Show Cause, Defendants are temporarily enjoined from manating that the Plaintiff speak only at the podium provided he does not cross the boundary set up by the Mayor the Commissioners.

AND IT IS FURTHER ORDERED

1. A copy of this order to show cause, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served upon the defendant's counsel within \_\_\_\_ days of the date hereof.
2. The plaintiff must file with the court her proof of service of the defendants no later than three (3) days before the return date.
3. Defendants shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by October\_\_\_\_, 2024. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. You must send a copy of your opposition papers directly to Judge \_\_\_\_\_, whose address is \_\_\_\_\_, New Jersey. You must also send a copy of your opposition papers to the plaintiff's attorney whose name and address appears above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and pay the required fee of \$\_\_\_\_\_ and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking.
4. The plaintiff must file and serve any written reply to the defendant's order to show cause opposition by \_\_\_\_\_, 2024. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge \_\_\_\_\_.
5. If the defendants do not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by

default, provided that the plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.

6. If the plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.

7. Defendants take notice that the plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the date of service of this order to show cause; not counting the day you received it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. Include a \$135.00 filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to the plaintiff's attorney whose name and address appear above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgement may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

8. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

9. The Court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than \_\_\_ days before the return date.

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J.S.C.

MARIO M. BLANCH, ESQ.  
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West New York, New Jersey 07093  
Attorney for Plaintiff  
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LEONARD FILIPOWSKI

Plaintiff,

v.

BRIAN STACK (IN HIS CAPACITY AS  
MAYOR), UNION CITY POLICE DEPARTMENT,  
UNION CITY BOARD OF COMMISSIONERS ,  
JOHN DOES 1-99, ABC CORPS. 1-99

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
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DOCKET NO:

Civil Action

**VERIFIED COMPLAINT**

Plaintiff, LEONARD FILIPOWSKI, by way of Verified Complaint Defendants,  
BRIAN STACK (IN HIS CAPACITY AS MAYOR), UNION CITY POLICE  
DEPARTMENT, UNION CITY BOARD OF COMMISSIONERS , JOHN DOES 1-99, ABC  
CORPS. 1-99 states the following:

**BACKGROUND FACTS APPLICABLE TO ALL COUNTS**

1. Plaintiff, Leonard Filipowski is an individual who lives in New York.
2. Mr. Filipowski is an independent reporter who operates a YouTube Channel and maintains a social media presence which he uses to report his stories.
3. Mr. Filipowski operates under the moniker “Leroy Truth” and his social media platforms are called “Leroy Truth Investigations.”

4. As part of Leroy Truth Investigations, Plaintiff has travelled around the country exposing government misconduct and corruption.

5. In or about December of 2023, Plaintiff started receiving tips of corruption and sexual misconduct in Union City, New Jersey.

6. As a result of the tips received by the Plaintiff, the Plaintiff began to actively investigate Mayor Brian Stack and other officials in Union City.

7. As part of his investigation, Plaintiff goes to public meetings and makes commentary and asks questions to the public officials during the public discourse portion of the meeting.

8. In addition to attending public meetings, Plaintiff has stood outside of the Brian Stack Civic Association and filmed, interviewed and spoken to patrons of Brian Stack.

9. Throughout all of his interviews, attendance of public meetings, and investigations, Plaintiff has acted within the scope of the law.

10. Despite acting within the scope of the law, the Defendants have weaponized the criminal legal system against the Plaintiff in order to prevent him from voicing his opinions and/or conducting an investigation.

11. Defendants have had supporters of Mayor Brian Stack file false, malicious, and frivolous criminal allegations against the Plaintiff. Attached hereto as Exhibit 1, are true and accurate copies of the allegations filed against the Plaintiff by Defendants and their supporters.

12. All of the interactions that are the subject of the false, malicious and frivolous criminal allegations have been video recorded and are documented by the Plaintiff. As such, Plaintiff has actual proof that such incidents and such allegations are patently false.

13. In fact, Mayor Brian Stack attempted to file two (2) criminal complaints himself alleging harassment because Plaintiff was actively recording him and commenting about him on social media. The allegations were frivolous, malicious and wanton as Mayor Brian Stack is a public figure and Plaintiff and is entitled to be filmed, commented upon, criticised, and even mocked.

### **THE JULY 16, 2024 INCIDENT**

14. As a result of the Plaintiff and other critics appearing at public meetings, the Mayor and the Commissioners have roped themselves off from the public. Accordingly, there is a barrier between the public and the Board of Commissioners.

15. In addition to roping themselves away from the public, the Defendants have set up a podium many feet away from the Commissioners.

16. On July 16, 2024, the Union City Board of Commissioners (“Board”) held a public meeting.

17. At the end of the meeting the Board allotted anyone who wished to speak five (5) minutes, which is legally required at Commission meetings. Attached hereto as Exhibit 2 is a true and accurate copy the video submitted on a USB Drive. The video can also be viewed on YouTube at [https://www.youtube.com/watch?v=Be-PO\\_oNBdM](https://www.youtube.com/watch?v=Be-PO_oNBdM).

18. Prior to Plaintiff speaking there was another speaker, and that speaker was admonished that he could not speak about certain topics that were embarrassing to the Commissioners and the Mayor specifically.



19. During his five (5) minutes Plaintiff did not speak at the podium but walked in front of the podium, but always stayed behind the roped area.

20. There is no law that requires the Plaintiff to utilise his five (5) minutes of speech at the podium.

21. While the Plaintiff was speaking during his allotted five (5) minutes, he was interrupted and reprimanded by the Union City Police Department.

22. Union City Police Officers advised the Plaintiff that he was interrupting the public meeting, acting in a disorderly manner and that he could only speak from the podium.

23. Plaintiff refused to go back to the podium and advised the police officers that there was no law that required that he speak from the podium. From the video the Plaintiff is not acting in a disorderly manner.

24. Despite there being no law requiring Plaintiff to use his five (5) minutes from the podium, the Union City Police continued to insist and then escalated the situation by getting in Plaintiff's face and acting aggressively towards the Plaintiff.

25. Despite the escalation by the police and the aggression displayed by the police, the Plaintiff refused to return to the podium.

26. As a result of the Plaintiff refusing to return to the podium he was arrested and criminally charged with disorderly conduct. Attached hereto as Exhibit 3 is a true and accurate copy of the criminal complaint of July 16, 2024.

27. Prior to the meeting, Plaintiff was advised from anonymous sources that Brian Stack intended to have him arrested and was going to find a way to get him arrested.

**THE DEFENDANTS**

28. Brian Stack is the Mayor of Union City, New Jersey and is a State Senator. At all times stated throughout the complaint, the Mayor was acting under the color of law.

29. The Union City Commissioners are the governing body of Union City, New Jersey and at all times stated throughout this complaint were acting under the color of law.

30. The Union City Police Department is the law enforcement body of the City of Union City and at all times stated throughout this complaint were acting under the color of law.

**FIRST COUNT**

**VIOLATION OF NEW JERSEY CIVIL RIGHTS**

31. Plaintiff repeats and alleges each and every allegation as if set forth at length herein.

32. N.J.S.A. 10:6-2 provides a private cause of action to individuals who have had substantive rights deprived which are guaranteed by the laws of the State of New Jersey, the New Jersey Constitution, and/or the United States Constitution.

33. The New Jersey Constitution's First Amendment provides that "Every person may freely speak, write and publish his sentiments on all subjects, being responsible for the abuse of that right. No law shall be passed to restrain or abridge the liberty of speech or of the press..."

34. The United States Constitution First Amendment provides "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof;

or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances....”

35. N.J.S.A. 10:4-12(a), provides the following:

Except as provided by subsection b. of this section all meetings of public bodies shall be open to the public at all times. Nothing in this act shall be construed to limit the discretion of a public body to permit, prohibit, or regulate the active participation of the public at any meeting, except that a municipal governing body and a board of education shall be required to set aside a portion of every meeting of the municipal governing body or board of education, the length of the portion to be determined by the municipal governing body or board of education, for public comment on any governmental or school district issue that a member of the public feels may be of concern to the residents of the municipality or school district. (Emphasis Added).

36. Defendants have engaged in a pattern of action designed to stifle and thwart the First Amendment free speech rights of the Plaintiff.

37. The Defendants have utilised the law to directly impede the message given by the Plaintiff. As such, the Defendants actions have not been content neutral.

38. The arrest and removal of the Defendant from the public meeting of July 16, 2024, was a violation of the Plaintiff’s statutory rights and rights conferred upon him in accordance with the New Jersey and Federal Constitutions.

39. As a result of the Defendants actions, the Plaintiff has suffered emotional harm, has been wrongfully arrested, and caused to incur legal fees and costs.

WHEREFORE, the Plaintiff demands the following relief:

- A. Compensatory Damages;
- B. Punitive Damages;
- C. Legal Costs and Attorney Fees;
- D. Injunctive Relief preventing Defendants from violating Plaintiff’s civil rights;

E. Any other relief the court finds just and equitable.

**SECOND COUNT**

**FALSE ARREST**

31. Plaintiff repeats and alleges each and every allegation as if set forth at length herein.

32. Defendants have engaged in a plot, plan and effort to thwart the efforts of Plaintiff to investigate and expose corruption and sexual harassment in Union City.

33. The Defendants have individually and collectively with supporters of Mayor Brian Stack conspired to file numerous false, frivolous, and malicious claims against the Plaintiff.

34. As a result of the false claims filed against the Plaintiff, Plaintiff has been arrested and deprived of his civil rights and liberties.

35. Plaintiff has suffered emotional distress and harm as a result of the false arrests.

WHEREFORE, the Plaintiff demands the following relief:

A. Compensatory Damages;


B. Punitive Damages;

C. Legal Costs and Attorney Fees;

D. Injunctive Relief preventing Defendants from filing false charges against Plaintiff;

E. Any other relief the court finds just and equitable.

LAW OFFICES OF MARIO M. BLANCH  
Attorneys for Plaintiff Mario Blanch


By:   
\_\_\_\_\_  
Mario M. Blanch, Esq.

Dated: July 25, 2023

**JURY DEMAND**

Plaintiff demands a trial by jury of all issues so triable.

LAW OFFICES OF MARIO M. BLANCH  
Attorneys for Plaintiff Mario Blanch

By:   
\_\_\_\_\_  
Mario M. Blanch, Esq.

Dated: July 25, 2023

**DESIGNATION OF TRIAL COUNSEL**

**PLEASE TAKE NOTICE** that pursuant to R: 4:25-4, Mario M. Blanch, Esquire is hereby designated Trial Counsel.

LAW OFFICES OF MARIO M. BLANCH  
Attorneys for Plaintiff Mario Blanch

By:   
\_\_\_\_\_  
Mario M. Blanch, Esq.

Dated: July 25, 2023

**CERTIFICATION PURSUANT TO R. 4:5-1(b)(2)**

The undersigned hereby certifies that the within action is not the subject of any other action pending in any Court or the subject of any arbitration proceeding in any Court, except for the criminal complaints attached hereto as Exhibit 1 and 3.

Furthermore, to the best of his knowledge, there are no other parties to be joined in this action, unless said parties are disclosed by subsequent discovery.

LAW OFFICES OF MARIO M. BLANCH  
Attorneys for Plaintiff Mario Blanch

By:

  
\_\_\_\_\_  
Mario M. Blanch, Esq.

Dated: July 21, 2024

**CERTIFICATION PURSUANT TO R. 1:38-7**

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

LAW OFFICES OF MARIO M. BLANCH  
Attorneys for Plaintiff Mario Blanch

By:

  
\_\_\_\_\_  
Mario M. Blanch, Esq.

Dated: July 21, 2024

**CERTIFICATION PURSUANT TO N.J.S.A. 47:1A-1 et. set. (“Daniel’s Law”)**

I hereby certify that, upon information and belief, none of the persons listed in this complaint are active or retired Judges, Prosecutors, and/or Law Enforcement Officers. Accordingly, there was no need to redact addresses in the complaint. If it is subsequently learned that any persons named are active or retired Judges, Prosecutors, and/or Law Enforcement Officers, the undersigned will notify the Court immediately, so that the pleadings can be redacted.

LAW OFFICES OF MARIO M. BLANCH,

By:

A handwritten signature in black ink, appearing to be 'Mario M. Blanch', written over a horizontal line.

Mario M. Blanch, Esq.

Dated: July 21, 2024

**CERTIFICATION AND VERIFICATION PURSUANT TO R. 1:4-4**

I, LEONARD FILIPOWSKI, of full age, hereby certify as follows:

1. I am the Plaintiff named within the Verified Complaint.

2. The factual statements thereof are true to my personal knowledge, information and belief. I have relied on counsel with respect to the statements of law.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

A handwritten signature in black ink, appearing to read 'Lex', is written over a horizontal line.

LEONARD FILIPOWSKI

Date July 21, 2024



MARIO M. BLANCH, ESQ.  
BLANCH LEGAL  
Attorney Id. # 030862002  
440-65th Street  
West New York, New Jersey 07093  
Attorney for Plaintiff  
Phone: 201-869-9898  
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Email: mario@blanchlegal.com

LEONARD FILIPOWSKI

Plaintiff,

v.

BRIAN STACK (IN HIS CAPACITY AS  
MAYOR), UNION CITY POLICE DEPARTMENT,  
UNION CITY BOARD OF COMMISSIONERS ,  
JOHN DOES 1-99, ABC CORPS. 1-99

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
HUDSON COUNTY  
DOCKET NO:

Civil Action

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**LEGAL BRIEF**

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Mario M. Blanch, Esq. on the brief

### **STATEMENT OF FACTS**

The facts relevant to this application are set forth in the Verified Complaint. Accordingly, this Brief will focus on the events that occurred on July 16, 2024, which are the focus of this application.

On July 16, 2024, Plaintiff attended the Union City Commissioners Meeting. In accordance with the Open Public Meetings Act, the Commissioners allotted a public participation portion of the meeting for public commentary. Union City Commissioners meetings limit the members of the public to five (5) minutes of speech, where they can discuss any topic that may be of interest to the municipality and the public.

The meeting was held at the cafeteria of a local school. The Commissioners were roped off in the front of the room and a podium was set up at the back of the cafeteria.

During Plaintiff's five (5) minutes, the Plaintiff walked in near the rope but never crossed the rope into the section where the Commissioners were located. Further, the Plaintiff only spoke during his allotted five (5) minutes and did not interrupt or interject during the meeting.

While the Plaintiff was speaking during his five (5) minutes, he was interrupted by police officers who became hostile and aggressive towards the Plaintiff. Police Officers advised the Plaintiff that he was obligated to speak only from the podium, despite the fact that there was no regulation, law, ordinance or other such rule that required the Plaintiff to speak only from the podium.

Plaintiff refused to speak from the podium and was subsequently arrested. Plaintiff learned that it was a plan to have him arrested. The Defendants have engaged in a concerted effort to utilize the criminal justice system against him in order to stifle his freedom of speech.

## **LEGAL ARGUMENT**

### **I. A PRELIMINARY INJUNCTION AGAINST THE DEFENDANTS IS NECESSARY TO PREVENT THE DEFENDANTS FROM SUFFERING IRREPARABLE INJURY AS A LOSS OF FREE SPEECH IS IRREPARABLE**

A preliminary injunction is required to prevent irreparable harm. Crowe v. De Gioia, 90 NJ 126, 133 (1982); citing Citizens Coach Co. v. Camden Horse R.R. Co., 29 N.J. Eq. 299, 303 (E. & A. 1878). Irreparable harm is harm that cannot properly be addressed with money damages. Ibid. Severe personal inconvenience can cause irreparable harm that necessitates injunctive relief. Ibid; citing Hodge v. Giese, 43 N.J. Eq. 342, 350 (Ch. 1887). "Harm is generally considered irreparable in equity if it cannot be redressed adequately by monetary damages ... because of the nature of the injury or of the right affected." Crowe at 132-33.

The United States Supreme Court has unequivocally ruled that a violation of First Amendment freedoms, for even minimal periods of time, "unquestionably constitutes irreparable injury," Elrod v. Burns, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976); Also see Davis v. New Jersey, 327 N.J. Super. 59 (Law Div. 1999);(court found that even a

threat of a First Amendment violation could cause irreparable harm and a chilling effect).

**II. PLAINTIFFS ARE ENTITLED TO RELIEF WHERE THEY HAVE ESTABLISHED THAT THE RELIEF THEY ARE SEEKING IS WELL SETTLED**

An injunction should be issued where the rights of the Plaintiff are well settled under New Jersey law. Crowe v. De Gioia, 90 NJ 126, 133 (1982).

Both the New Jersey and Federal Constitutions provide for Freedom of Speech. The United States Constitution prohibits the government from abridging "freedom of speech" or "the right of the people ... to petition the Government for a redress of grievances." U.S. Const. amend. I.[8] The First Amendment gives people the right to express disagreement with government policy, whether on the national, state, or local level. See NAACP v. Claiborne Hardware Co., 458 U.S. 886, 913, 102 S.Ct. 3409, 3425, 73 L.Ed.2d 1215, 1236 (1982) ("[E]xpression on public issues has always rested on the highest rung of the hierarchy of First Amendment values." (citation and internal quotation marks omitted)). Our free society must give breathing room for an "uninhibited" and "robust" discussion of public issues, even when it "include[s] vehement, caustic, and sometimes unpleasantly sharp attacks on government and public officials." New York Times Co. v. Sullivan, 376 U.S. 254, 270, 84 S.Ct. 710, 721, 11 L.Ed.2d 686, 701 (1964). One of the core purposes of the First Amendment is to protect speech on matters of public interest, including speech that the government finds offensive. See Police Dep't of Chi. v. Mosley, 408 U.S. 92, 96, 92 S.Ct. 2286, 2290, 33 L.Ed.2d 212, 217 (1972). Freedom of speech, therefore, protects not just the

speech that we find agreeable, but also the speech that we hate. See Tex. v. Johnson, 491 U.S. 397, 414, 109 S.Ct. 2533, 2545, 105 L.Ed.2d 342, 360 (1989); see also Girouard v. U.S., 328 U.S. 61, 68, 66 S.Ct. 826, 829, 90 L.Ed. 1084, 1090 (1946) (citing U.S. v. Schwimmer, 279 U.S. 644, 654-55, 49 S.Ct. 448, 451, 73 L.Ed. 889, 893 (1929) (Holmes, J., dissenting)).[9]

N.J.S.A. 10:4-12(a), provides the following:

Except as provided by subsection b. of this section all meetings of public bodies shall be open to the public at all times. Nothing in this act shall be construed to limit the discretion of a public body to permit, prohibit, or regulate the active participation of the public at any meeting, except that a municipal governing body and a board of education shall be required to set aside a portion of every meeting of the municipal governing body or board of education, the length of the portion to be determined by the municipal governing body or board of education, for public comment on any governmental or school district issue that a member of the public feels may be of concern to the residents of the municipality or school district.

Once a governmental entity opens the floor for discussion of matters of public concern it “may not grant the use of the forum to people whose views it finds acceptable, but deny use to those wishing to express less favored or more controversial views. Besler v. Board of Education, 201 N.J. 544 (2010).

It is the burden of the government agency to show that any restriction it imposes on speech in a public forum is done for a constitutionally permissible purpose. Besler v. Board of Education, 201 N.J. 544 (2010); See U.S. v. Playboy Entm't Group, Inc., 529 U.S. 803, 816, 120 S.Ct. 1878, 1888, 146 L.Ed.2d 865, 881 (2000); Phila. Newspapers, Inc. v. Hepps,

475 U.S. 767, 777, 106 S.Ct. 1558, 1564, 89 L.Ed.2d 783, 793 (1986) ("In the context of governmental restriction of speech, it has long been established that the government cannot limit speech protected by the First Amendment without bearing the burden of showing that its restriction is justified.").

A governmental entity may impose reasonable time, place, and manner restrictions on speech in a public forum so long as "the restrictions `are justified without reference to the content of the regulated speech, that they are narrowly tailored to serve a significant governmental interest, and that they leave open ample alternative channels for communication of the information.'" Clark v. Cmty. for Creative Non-Violence, 468 U.S. 288, 293, 104 S.Ct. 3065, 3069, 82 L.Ed.2d 221, 227 (1984)).

There is no law or ordinance that requires a speaker to speak only from a podium. It was clear from the outset of the meeting that the Defendants were trying to stifle free speech. Prior to Plaintiff speaking and individual who was speaking from the podium was advised not to discuss certain topics. The topics were criminal complaints that had been filed by Brian Stack and were dismissed as lacking probable cause. The Open Public Meetings Act ("OPMA") makes it clear that commissioners must give time to members of the public to discuss anything that "may be of concern to the residents of the municipality." The language of the OPMA is broad, and does not limit what may or may not be of concern to the public. It is not for the commissioners to determine what may be of concern.

After the first speaker speaks, Plaintiff gets up to speak and discusses an award he wants to give the Mayor. Plaintiff starts speaking and is accosted by police officers and told he is acting in a disorderly manner. It is clear from the video that the police are the ones acting aggressively and are out of line. Plaintiff at no time did anything but speak in a public forum.

The Defendants have engaged in a concerted effort to have the Plaintiff arrested for his views and his speech. The Plaintiff has been the subject of various criminal complaints, none of which have any merit. The Mayor himself has filed two complaints both of which were dismissed for lack of probable cause. It is clear that the Mayor and the Defendants are engaging in a weaponization of the criminal justice system.

Injunctive relief is required to prevent the absurdity that is occurring. Defendants do not need to agree with the Plaintiff's view points, but they have to allow his viewpoints to be heard. The Mayor and the Commissioners are public officials, who put themselves into the public forum and are now subject to public discourse. They may not like the discourse, but they chose to put themselves into that foray. Having the Plaintiff arrested and charged for his viewpoints is the antithesis of this country. The bedrock of our society is discourse and expression.

Injunctive relief is needed to prevent the Defendants from continually violating the

Plaintiff's rights.

**III. THE FACTS OF THIS MATTER ARE UNCONTROVERTED**

A third rule is that a preliminary injunction should not issue where all material facts are controverted. Crowe v. De Gioia, 90 NJ 126, 134 (1982). To prevail on an application for temporary relief, a plaintiff must make a preliminary showing of a reasonable probability of ultimate success on the merits. Ibid.

The facts of this matter are uncontroverted. A review of the video and the history of arrest shows that the Mayor the Commissioners utilised the podium as an excuse to arrest the Plaintiff on the pretext that he was acting disorderly.

**IV. THE EQUITIES IN THIS MATTER FAVOR THE PLAINTIFF WHERE THE BEDROCK OF OUR SOCIETY IS FREE SPEECH AND PLAINTIFF'S RIGHTS ARE BEING VIOLATED BECAUSE THE DEFENDANTS DO NOT AGREE WITH HIS VIEWPOINTS AND/OR STATEMENTS**

The final test in considering the granting of a preliminary injunction is the relative hardship to the parties in granting or denying relief. Crowe v. De Gioia, 90 NJ 126, 134-35 (1982). Where the balance of equities favors the Plaintiff, the Court should grant temporary relief pending the outcome of a final hearing. Ibid.

The bedrock and foundation of our society is free speech. Stifling and chilling free speech is nothing short of the diminishment of our society. It is antagonistic to democracy that a State Senator and Mayor is the one violating the First Amendment, when he is

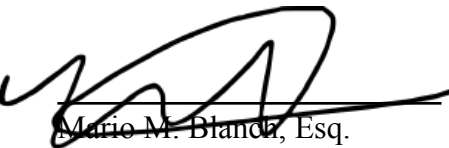


encharged with upholding the law. Equity favors the Plaintiff and the First Amendment.

**CONCLUSION**

For the foregoing reasons it is respectfully requested that the Court grant the relief requested by the Plaintiff.

LAW OFFICES OF MARIO M. BLANCH,

By   
Mario M. Blanch, Esq.

Dated: July 21, 2024

## COMPLAINT - SUMMONS

COMPLAINT NUMBER:				THE STATE OF NEW JERSEY VS. LEONARD FILIPOWSKI	
0910	S	2024	000291		
UNION CITY MUNICIPAL COURT 3715 PALISADE AVE UNION CITY NJ 07087-0000 201-348-5763 COUNTY OF: HUDSON			ADDRESS: PO BOX 3464  STANFORD CT 06905-0000		
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 24032293		DEFENDANT INFORMATION	
COMPLAINANT NAME: MARCOS VERAS			SEX: M	EYE COLOR:	DOB:
			DRIVER'S LIC. #:	SOCIAL SECURITY #:	SBI #:
			TELEPHONE #: 201-953-9984 (c)	DL STATE:	
			LIVESCAN PCN #:		

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/09/2024 in **UNION CITY**, **HUDSON** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, WITH PURPOSE TO HARASS ANOTHER, SUBJECT ANOTHER PERSON TO SHOVING, SPECIFICALLY BY PUSHING THE VICTIM, CAUSING HIM TO FALL TO THE GROUND AND REAGGRAVATING A PREXISTING INJURY TO HIS RIGHT FOOT, WHICH IS IN VIOLATION OF N.J.S.A. 2C:33-4B.

**in violation of:**

Original Charge	1) 2C:33-4B	2)	3)
Amended Charge			

**CERTIFICATION** I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.  
 Signed: Date: 3/9/23

### PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS

Probable cause IS NOT found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator \_\_\_\_\_ Date \_\_\_\_\_ Signature of Judge \_\_\_\_\_ Date \_\_\_\_\_

Probable cause IS found for the issuance of this complaint-summons:  
 Signature of Judge Date: 3/25/24

**SUMMONS**

YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: HUDSON at the following address: UNION CITY MUNICIPAL COURT 3715 PALISADE AVE UNION CITY NJ 07087-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.  
 Date of Arrest: Appearance Date: 03/20/2024 Time: Phone: 201-348-5763

Signature of Person Issuing Summons: \_\_\_\_\_ Date: \_\_\_\_\_

<input type="checkbox"/> Domestic Violence - Confidential	<input type="checkbox"/> Related Traffic Tickets or Other Complaints	<input type="checkbox"/> Serious Personal Injury/ Death Involved
---	--	--

**Special conditions of release:**

No phone, mail or other personal contact w/victim

No possession firearms/weapons

Other (specify):



# COMPLAINT - SUMMONS

COMPLAINT NUMBER  
**0910 S 2024 000333**

**THE STATE OF NEW JERSEY**  
**VS.**

UNION CITY MUNICIPAL COURT  
 3715 PALISADE AVE  
 UNION CITY NJ 07087-0000  
 201-348-5763 COUNTY OF: HUDSON

ADDRESS:  
**LEONARD FILIPOWSKI**  
 PO BOX 3464  
 STAMFORD CT 06901-0000

# of CHARGES: **1** CO-DEFTS: POLICE CASE #: **2403545**

DEFENDANT INFORMATION  
 SEX: **M** EYE COLOR: DOB: **09/08/1964**  
 DRIVER'S LIC. #.: DL STATE:  
 SOCIAL SECURITY #: SBI #: **( )**  
 TELEPHONE #: LIVESCAN PCN #:

COMPLAINANT NAME: **VICTOR GRULLON**

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **03/05/2024** in **UNION CITY HUDSON County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, MR. LEONARD FILIPOWSKI, WITH PURPOSE TO HARASS ANOTHER, MAKE OR CAUSE TO BE MADE, ONE OR MORE COMMUNICATIONS IN A MANNER LIKELY TO CAUSE ANNOYANCE OR ALARM, SPECIFICALLY BY, DEMEANING AND INTIMIDATING VICTIM MR. VICTOR GRULLON BY YELLING INAPPROPRIATE COMMENTS TO HIM WITH A CAMERA IN HAND WHILE OUTSIDE OF A SCHOOL.

**in violation of:**

Original Charge	1) <b>2C:33-4A</b>	2)	3)
Amended Charge			

**CERTIFICATION** I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.  
 Signed: *[Signature]* Date: \_\_\_\_\_

**PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS**

Probable cause IS NOT found for the issuance of this complaint:  
 Signature of Court Administrator or Deputy Court Administrator \_\_\_\_\_ Date \_\_\_\_\_  
 Probable cause IS found for the issuance of this complaint-summons:  
 Signature of Judge \_\_\_\_\_ Date **3/27/24**  
 Signature of Judge \_\_\_\_\_ Date \_\_\_\_\_

**SUMMONS**  
 YOU ARE HEREBY **SUMMONED** to appear before the Municipal Court in the county of: **HUDSON**  
 at the following address: **UNION CITY MUNICIPAL COURT**  
**3715 PALISADE AVE**  
**UNION CITY NJ 07087-0000**

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.  
 Date of Arrest: Appearance Date: **03/27/2024** Time: **08:00 AM** Phone: **201-348-5763**

Signature of Person Issuing Summons: *[Signature]* Date: \_\_\_\_\_

- Domestic Violence – Confidential
- Related Traffic Tickets or Other Complaints
- Serious Personal Injury/ Death Involved

Special conditions of release:  
 No phone, mail or other personal contact w/victim  
 No possession firearms/weapons  
 Other (specify):

**SIMUL ORIGINALS**

**COMPLAINT - SUMMON**

COMPLAINT NUMBER  
**0910 S 2024 000341**

THE STATE OF NEW JERSEY

VS.

LEONARD FILIPOWSKI

UNION CITY MUNICIPAL COURT  
 3715 PALISADE AVE  
 UNION CITY NJ 07087-0000  
 201-348-5763 COUNTY OF: HUDSON

ADDRESS: PO BOX 3464  
 STAMFORD CT 06905-0000

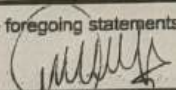
# of CHARGES: 1  
 CO-DEFTS:  
 POLICE CASE #: 24037003  
 COMPLAINANT NAME: LASSALLE

DEFENDANT INFORMATION  
 SEX: EYE COLOR: DOB: 09/08/1964 DL STATE:  
 DRIVER'S LIC. #:  
 SOCIAL SECURITY #: SBI #:  
 TELEPHONE #: ( )  
 LIVSCAN PCN #:

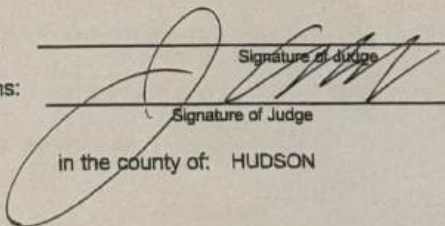
By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/12/2024 in UNION CITY HUDSON County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, LEONARD FILIPOWSKI DID WITH PURPOSE TO HARASS ANOTHER, ANA LASSALLE, DID MAKE OR CAUSE TO BE MADE A COMMUNICATION OR COMMUNICATIONS IN A MANNER LIKELY TO CAUSE ANNOYANCE OR ALARM, SPECIFICALLY BY GOING INTO CITY HALL AND RECORDING WITH A CAMERA ON A TRIPOD, BANGING ON DOORS LEADING TO RESTRICTED AREAS AND GETTING INTO MS. LASSALLE'S PERSONAL SPACE AND SCREAMING IN HER FACE PUTTING HER IN TERROR SINCE THIS HAS BEEN GOING ON EVERY FRIDAY SINCE FEBRUARY OF 2024, IN VIOLATION OF N.J.S.A. 2C:33-4A

in violation of:

Original Charge	1) 2C:33-4A	2)	3)
Amended Charge			

CERTIFICATION I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.  
 Signed:  Date: 3/18/2024

**PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS**

Probable cause IS NOT found for the issuance of this complaint:  
 Signature of Court Administrator or Deputy Court Administrator \_\_\_\_\_ Date \_\_\_\_\_  
 Signature of Judge \_\_\_\_\_ Date \_\_\_\_\_  
 Probable cause IS found for the issuance of this complaint-summons:  
 Signature of Judge  Date 3/25/24

**SUMMONS**  
 YOU ARE HEREBY SUMMONED to appear before the Municipal Court in the county of: HUDSON  
 at the following address: UNION CITY MUNICIPAL COURT  
 3715 PALISADE AVE UNION CITY NJ 07087-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.  
 Date of Arrest: Appearance Date: 03/27/2024 Time: 11:00 AM Phone: 201-348-5763

Signature of Person Issuing Summons: \_\_\_\_\_ Date: \_\_\_\_\_

Domestic Violence - Confidential  Related Traffic Tickets or Other Complaints  Serious Personal Injury/ Death Involved

Special conditions of release:  
 No phone, mail or other personal contact w/victim  
 No possession firearms/weapons  
 Other (specify):

DUPLICATE ORIGINALS  
 Page 1 of 7

S-2024-000307-0910 06/12/2024 02:58:32 PM Pg 3 of 7 Trans ID: MCS20241442985

## COMPLAINT - SUMMONS (DEFENDANT'S COPY)

<b>COMPLAINT NUMBER</b>				<b>THE STATE OF NEW JERSEY</b> VS. <b>LEONARD FILIPOWSKI</b> ADDRESS: <b>1388 ROUTE 52</b> <b>FISHKILL NY 12524-0000</b>	
<b>0910</b>	<b>S</b>	<b>2024</b>	<b>000307</b>		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
UNION CITY MUNICIPAL COURT 3715 PALISADE AVE UNION CITY NJ 07087-0000 201-348-5763 COUNTY OF: HUDSON					
# of CHARGES	CO-DEFTS	POLICE CASE #:		DEFENDANT INFORMATION	
1		24033422		SEX: M EYE COLOR: BROWN	DOB:
COMPLAINANT NAME: <b>BRIAN P STACK</b>				DRIVER'S LIC. #:	DL STATE:
				SOCIAL SECURITY #: xxx-xx-x453	SBI #:
				TELEPHONE #: 201-953-9984 (C)	LIVESCAN PCN #:

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **03/11/2024** in **UNION CITY**, **HUDSON** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, WITH PURPOSE TO HARASS ANOTHER, THE DEFENDANT DID ENGAGE IN A COURSE OF ALARMING CONDUCT WITH PURPOSE TO ALARM OR SERIOUSLY ANNOY THE VICITM MR. BRIAN P. STACK, SPECIFICALLY BY PRESENTING HIMSELF TO MR. STACKS PLACE OF BUSINESS ON MULTIPLE OCASSIONS, YELLING FOR HIM TO RESIGN FROM HIS OFFICE DUE TO THE CORRUPT NATURE OF HIS POSITION WITHIN THE CITY. IN ADDITION, THE DEFENANT HAS ALSO PRESENTED HIMSELF TO ANY/OTHER LOCATIONS WHERE MR. STACK IS PRESENT WITH THE INTENT TO INTERRUPT PRIVATE EVENTS. LASTLY, THE DEFENANT HAS CONTINUOUSLY CREATED PUBLIC POSTS ON MULTIPLE SOCIAL MEDIA PLATFORMS, USING MR. STACKS IMAGE IN AN ACTIVE HIS INTEGRITY IN QUESTION BY WRITING SEVERAL DEROGATORY REMARKS AGAINST HIM AND/OR ANYONE THAT IS RELATED TO HIM CAUSING ALARM AND ANNOYACE IN VIOLATION OF N.J.S.A. 2C:33-4C.

**in violation of:**

Original Charge	1) 2C:33-4C	2)	3)
Amended Charge			

**CERTIFICATION** I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

### PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS

Probable cause IS NOT found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator \_\_\_\_\_ Date \_\_\_\_\_ Signature of Judge \_\_\_\_\_ Date \_\_\_\_\_

Probable cause IS found for the issuance of this complaint-summons:

Signature of Judge \_\_\_\_\_ Date \_\_\_\_\_

**SUMMONS**

YOU ARE HEREBY **SUMMONED** to appear before the Municipal Court in the county of: **HUDSON**

at the following address: **UNION CITY MUNICIPAL COURT**

**3715 PALISADE AVE** **UNION CITY NJ 07087-0000**

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest: \_\_\_\_\_ Appearance Date: **07/15/2024** Time: **09:00AM** Phone: **201-348-5763**

Signature of Person Issuing Summons: **KAREN BOYLAN JUDICIAL OFFICER** Date: **06/12/2024**

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Domestic Violence – Confidential | <input type="checkbox"/> Related Traffic Tickets or Other Complaints | <input type="checkbox"/> Serious Personal Injury/ Death Involved |
|---|--|--|

**Special conditions of release:**

- No phone, mail or other personal contact w/victim
- No possession firearms/weapons
- Other (specify): \_\_\_\_\_

SIMULTANEOUS

COMPLAINT - SUMMONS (DEFENDANT'S COPY)

# COMPLAINT

0910

2024

000306

THE STATE OF NEW JERSEY

VS.

LEONARD C FILIPOWSKI

UNION CITY MUNICIPAL COURT  
3715 PALISADE AVE  
UNION CITY NJ 07087-0000  
201-348-5763 COUNTY OF: HUDSON

ADDRESS: 1388 ROUTE 52

FISHKILL

NY 12524-0000

# of CHARGES

2

CO-DEFTS

POLICE CASE #:  
24033427

DEFENDANT INFORMATION

SEX: M EYE COLOR: BROWN

DOB: 09/08/1964

DRIVER'S LIC. #: 853388613

DL STATE: NY

SOCIAL SECURITY #: xxx-xx-x453

SBI #:

TELEPHONE #: 305-707-8325 (C)

LIVSCAN PCN #:

COMPLAINANT NAME: ANTHONY FACCHINI

.87

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 03/11/2024 in UNION CITY, HUDSON County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, WITH PURPOSE TO HARASS ANOTHER, MAKE OR CAUSE TO BE MADE A COMMUNICATION OR COMMUNICATIONS IN A MANNER LIKELY TO CAUSE ANNOYANCE OR ALARM, SPECIFICALLY BY UTILIZING SOCIAL MEDIA PLATFORMS TO DENIGRATED THE VICTIM MR. ANTHONY FACCHINI. SOCIAL MEDIA POSTINGS AND VIDEO CONTENT WERE GENERATED LABELLING MR. FACCHINI A CORRUPT PUBLIC OFFICIAL DERELICT IN HIS DUTY WITH THE INTENT TO CAUSE REPEATED ANNOYANCE AND EMOTIONAL HARM IN VIOLATION OF N.J.S.A 2C:33-4A.

WITHIN THE JURISDICTION OF THIS COURT, COMMITTED THE ACT OF CYBER HARASSMENT, SPECIFICALLY BY GENERATING SOCIAL MEDIA POSTS OF THE VICTIM MR. ANTHONY FACCHINI IN SUCH A MANNER THAT WOULD DEINGRADE AND TRANISH HIS POSITION AS A PUBLIC OFFICIAL. IN ADDITION, THE DEFENDANT HAS DOCTORED UNREALATED PHOTOS OF MR. FACCHINI IN MANNER THAT WOULD PLACE HIM IN FEAR OF EMOTIONAL HARM TO HIS PERSON IN VIOLATION OF N.J.S.A 2C:33-4.1A (2).

in violation of:

Original Charge 1) 2C:33-4A 2) 2C:33-4.1A(2) 3)

Declined

Amended Charge

CERTIFICATION: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Signed:

Date:

You will be notified of your Central First Appearance/CJP date to be held at the Superior Court in the county of HUDSON at the following address: HUDSON COUNTY COURT

ADMINISTRATION BUILDING 595 NEWARK AVENUE JERSEY CITY NJ 07306-0000

Date of Arrest: Appearance Date: Time: Phone: 201-795-6000

## PROBABLE CAUSE DETERMINATION AND ISSUANCE OF WARRANT

Probable cause IS NOT found for the issuance of this complaint.

Signature of Court Administrator or Deputy Court Administrator Date Signature of Judge Date

Probable cause IS found for the issuance of this complaint.

Signature and Title of Judicial Officer Issuing Warrant Date

TO ANY PEACE OFFICER OR OTHER AUTHORIZED PERSON: PURSUANT TO THIS WARRANT YOU ARE HEREBY COMMANDED TO ARREST THE NAMED DEFENDANT AND BRING THAT PERSON FORTHWITH BEFORE THE COURT TO ANSWER THE COMPLAINT.

Bail Amount Set: by: (If different from judicial officer that issued warrant)

Domestic Violence - Confidential

Related Traffic Tickets or Other Complaints

Serious Personal Injury/ Death Involved

Special conditions of release:

- No phone, mail or other personal contact w/victim
- No possession firearms/weapons
- Other (specify):

ORIGINAL  
Page 1 of 7

# COMPLAINT - SUMMONS

COMPLAINT NUMBER  
**0910 S 2024 000336**

THE STATE OF NEW JERSEY

VS.

LEONARD FILIPOWSKI

UNION CITY MUNICIPAL COURT  
 3715 PALISADE AVE  
 UNION CITY NJ 07087-0000  
 201-348-5763 COUNTY OF: HUDSON

ADDRESS: PO BOX 3464  
 STAMFORD CT 06901-0000

# of CHARGES: 1  
 CO-DEFTS: POLICE CASE #: 24032312

DEFENDANT INFORMATION  
 SEX: EYE COLOR: DOB: 09/08/1964  
 DRIVER'S LIC. #: DL STATE:  
 SOCIAL SECURITY #: SBI #: ( )  
 TELEPHONE #: ( )  
 LIVSCAN PCN #:

COMPLAINANT NAME: WENDY GRULLON

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **03/09/2024** in **UNION CITY**, **HUDSON** County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, MR. LEONARD FILIPOWSKI DID COMMIT SIMPLE ASSAULT BY RECKLESSLY CAUSING BODILY INJURY TO MS. WENDY GRULLON, SPECIFICALLY BY, PUSHING MS. GRULLON TO THE FLOOR WITH HIS RIGHT FOREARM CAUSING HER TO FALL TO THE FLOOR AND HIT HER HEAD. IN VIOLATION OF N.J.S. 2C:12-1A

**in violation of:**

Original Charge	1) 2C:12-1A(1)	2)	3)
Amended Charge			

**CERTIFICATION** I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.  
 Signed: X Wendy Grullon Date: 3-17-24

**PROBABLE CAUSE DETERMINATION AND ISSUANCE OF SUMMONS**

Probable cause IS NOT found for the issuance of this complaint:

Signature of Court Administrator or Deputy Court Administrator \_\_\_\_\_ Date \_\_\_\_\_  
 Probable cause IS found for the issuance of this complaint-summons:  
 Signature of Judge [Signature] Date 3/17/24  
 Signature of Judge \_\_\_\_\_ Date \_\_\_\_\_

**SUMMONS**

YOU ARE HEREBY **SUMMONED** to appear before the Municipal Court in the county of: HUDSON at the following address: UNION CITY MUNICIPAL COURT

3715 PALISADE AVE UNION CITY NJ 07087-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest: Appearance Date: 03/17/2024 Time: 08:30AM Phone: 201-348-5763

Signature of Person Issuing Summons: X Wendy Grullon Date: 3-17-24

- Domestic Violence - Confidential
- Related Traffic Tickets or Other Complaints
- Serious Personal Injury/ Death Involved

**Special conditions of release:**  
 No phone, mail or other personal contact w/victim  
 No possession firearms/weapons  
 Other (specify):

## RETURN OF SERVICE INFORMATION

COMPLAINT NUMBER			
<b>0910</b>	<b>S</b>	<b>2024</b>	<b>000797</b>
COURT CODE	PREFIX	YEAR	SEQUENCE NO.

**UNION CITY MUNICIPAL COURT**  
 3715 PALISADE AVE  
 UNION CITY NJ 07087-0000  
 201-348-5763 COUNTY OF: HUDSON

*THE STATE OF NEW JERSEY*  
**VS.**  
**LEONARD FILIPOWSKI**

ADDRESS: P.O. BOX 3464  
 STANDFORD CT 06905-0000

# of CHARGES 1	CO-DEFTS	POLICE CASE #: 24-105650
-------------------	----------	-----------------------------

COMPLAINANT NAME: **FERNANDO MURO**  
 3715 PALISADE AVE  
 ATTN WARRANTS  
 UNION CITY NJ 07087

DEFENDANT INFORMATION  
 SEX: **M** EYE COLOR: **BLUE** DOB: **09/08/1964**  
 DRIVER'S LIC. # \_\_\_\_\_ DL STATE: \_\_\_\_\_  
 SOCIAL SECURITY # \_\_\_\_\_ SBI #: \_\_\_\_\_  
 TELEPHONE #: \_\_\_\_\_  
 LIVSCAN PCN #: \_\_\_\_\_

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **07/16/2024** in **UNION CITY**, **HUDSON County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, THE DEFENDANT COMMITTED THE ACT OF DISORDERLY CONDUCT BY PURPOSELY AND KNOWINGLY DISRESPECTING THE BOARD OF COMMISSIONERS, FAILED TO COMPLY WITH MULTIPLE ORDERS TO SIT DOWN, FAILURE TO STAND BEHIND THE PODIUM AS ORDERED BY CAPTAIN HERNANDEZ, WAS DEEMED BY CORPORATE LAWYER ANGELO AUTIERITO TO HAVE DISPLAYED DISRUPTIVE BEHAVIOR DURING THE MEETING AND FAILURE TO STEP AWAY FROM THE COMMISSIONERS IN VIOLATION OF N.J.S.A 2C:33-2A(1).

**In violation of:**

Original Charge	1) <b>2C:33-2A(1)</b>	2)	3)
-----------------	-----------------------	----	----

Check ✓	<b>Certification by Police Regarding Complaint-Summons</b>
✓	I certify that I served the complaint-summons by delivering a copy to the defendant personally.
	I certify that I personally served the complaint-summons by leaving a copy at the defendant's usual place of abode with a competent member of the household of the age 14 or over _____ <small>Name of family member over 14 years of age</small>
	I certify that I mailed a copy of the complaint-summons by ordinary mail to the defendant at his or her last known address. _____ <small>Defendant's last known address</small>
	I certify that I served the complaint-summons by delivering a copy to a person authorized to receive service of process on the defendant's behalf. _____ <small>Name and title of authorized person</small>
	Other manner of service: I certify that I served the complaint-summons in the following manner: _____
	I certify that I was unable to serve the complaint-summons.

Signed: **FERNANDO MURO UNION CITY POLICE DEPT** Date of Action: **07/16/2024**  
Name, Title and Department of Officer

Exhibit 3



## Article II Board of Commissioners

---

### § 4-6 Organization.

The Board of Commissioners of the City shall consist of five Commissioners, who shall be elected at large by the voters of the City at a regular municipal election and who shall serve for terms of four years, beginning on the first Tuesday following their election.

### § 4-7 Powers.

All the executive, administrative, judicial and legislative powers of the City shall be vested in the Board of Commissioners, including the powers of a local Department of Health.

### § 4-8 Meetings and procedures.

- A. Regular meetings. The Board of Commissioners shall organize on the first Tuesday following the regular quadrennial municipal election. At the meeting, or as soon thereafter as practical, the Board shall create, condemn or abolish all subordinate boards and appoint any officers that it deems necessary for the proper and official conduct of the affairs of the City. After the organization meeting, the Board shall meet regularly, at least twice a month, on dates to be determined by resolution. When the time for any regular meeting of the Board falls on a legal holiday, as prescribed by law, the meeting shall be held at the same hour on the next succeeding day which is not a legal holiday.
- B. Special meetings. Special meetings of the board may be held on call of the Mayor or any two Commissioners, in accordance with the provisions of N.J.S.A. 40:72-13.
- C. Procedure. Except in cases where the Board of Commissioners provides otherwise by resolution, the proceedings at the meetings of the Board shall be conducted in accordance with Robert's Rules of Order. The Corporation Counsel shall be ex officio parliamentarian and shall be prepared, at the request of Commissioner, to give his/her opinion on any question of procedure.
- D. Attendance. All regular and special meetings of the Board of Commissioners shall be open to the public, and any citizen may have access to the minutes of any meeting, upon application to the City Clerk. The Corporation Counsel, the Clerk and any other City officer or employee whose presence shall be required by resolution of the Board of Commissioners shall attend such meetings.

### § 4-9 Quorum.

A majority of all members of the Board of Commissioners shall constitute a quorum at any regular or special meeting, but a lesser number than a quorum may adjourn the meeting. If no member of the Board is present one hour after the appointed time of any meeting, the Clerk shall adjourn the meeting.

### § 4-10 Vacancies.

When a vacancy occurs in the office of Commissioner, it shall be filled in accordance with state law.

Union City, New Jersey Meeting Ordinance

# Certificate of Completion

 **Leroy Truth Complaint and OSC-merged.pdf** ID: c0b4757e-b889-4b1f-8813-38c34e7dd0e5

SIGN REQUEST ISSUED:

**Jul 21, 2024**


12:47 PM UTC

REQUESTED BY:

**Mario Blanch**

mario@blanchlegal.com

STATUS:

 **Completed**

on 21 Jul, 2024, 12:54 PM UTC

## Audit trail

Generated on Jul 21, 2024

21 Jul, 2024, 12:53 PM UTC

**Mario Blanch** has signed the document

mario@blanchlegal.com  **Verified**

68.198.179.175

21 Jul, 2024, 12:53 PM UTC

**Mario Blanch** has invited to sign the document

mario@blanchlegal.com  **Verified**

21 Jul, 2024, 12:54 PM UTC

**Leonard Filipowski** has signed the document

leroytruth247@gmail.com  **Verified**

2600:480a:305f:fc00:2431:a4e2:ca1f:4e19

