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Rasheed Siyam

RASHEED SIYAM,

Plaintiff,

v.

TOWNSHIP OF NORTH BERGEN,
 CHIEF ROBERT J. FARLEY, JR.,
 individually, DAVID CORBISIERO,
 individually, and
 JOHN DOES 1-10,

Defendants.

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION, CIVIL PART
 HUDSON COUNTY

Civil Action

**COMPLAINT, JURY DEMAND,
 DESIGNATION OF TRIAL COUNSEL,
 DEMAND FOR DISCOVERY OF
 INSURANCE INFORMATION,
 DEMAND TO PRESERVE EVIDENCE,
 AND CERTIFICATION**

Plaintiff Rasheed Siyam, by and through his undersigned attorneys, The Toscano Law Firm, LLC, by way of Complaint against Defendants Township of North Bergen, Chief Robert J. Farley, Jr., David Corbisiero, and John Does 1-10, alleges as follows:

PARTIES

1. Plaintiff Rasheed Siyam (“Plaintiff” or “Siyam”) is an adult individual residing in the State of New Jersey. At all times relevant to the claims asserted herein, Plaintiff was employed by the Township as a police officer with the North Bergen Police Department (the “NBPD” or the “Department”).

2. Defendant Township of North Bergen (“North Bergen” or the “Township”) is a public entity and municipal corporation organized and existing under the laws of the State of New Jersey, with its principal offices located at 4233 Kennedy Boulevard, North Bergen, Hudson

County, New Jersey 07047. The Township maintained, administered, operated, managed, and controlled the NBPD and was responsible for the acts, omissions, policies, practices, and decisions of its authorized officials, supervisors, employees, agents, and representatives.

3. Defendant Chief Robert J. Farley, Jr. (“Chief Farley” or “Farley”) is an adult individual residing in the State of New Jersey. Farley became Chief of the NBPD effective February 1, 2024. Before that appointment, he served within the NBPD command structure, including as Deputy Chief. During the periods relevant to the conduct attributed to him, Farley exercised command and supervisory authority over Plaintiff, controlled or materially influenced officer assignments and the Department’s response to employee complaints, and acted directly and indirectly on behalf of the Township.

4. Defendant David Corbisiero (“Deputy Chief Corbisiero” or “Corbisiero”) is an adult individual residing in the State of New Jersey. During the periods relevant to the conduct attributed to him, Corbisiero served as Deputy Chief within the NBPD command structure, exercised supervisory authority over Plaintiff, participated in or had authority concerning officer assignments and requests for command intervention, and acted directly and indirectly on behalf of the Township. Corbisiero later retired from the NBPD.

5. Defendants John Does 1-10 are presently unidentified Township or NBPD officials, supervisors, employees, agents, or other persons who participated in, approved, ratified, facilitated, or failed to remedy the unlawful conduct alleged herein. Plaintiff will amend this Complaint when their identities and respective roles are learned through discovery.

FACTUAL ALLEGATIONS RELEVANT TO ALL CLAIMS FOR RELIEF

6. Plaintiff Siyam repeats and realleges the allegations set forth in the preceding paragraphs with the same force and effect as if each were fully set forth at length herein.

7. Plaintiff is a member of protected classes based upon his actual and/or perceived race, color, ethnicity, ancestry, national origin, and religion or creed.

8. During the relevant period, Frank Mena (“Mena”) was employed by the Township as an NBPB Detective and worked in the same municipal police workplace as Plaintiff.

MENA’S DISCRIMINATORY HARASSMENT OF PLAINTIFF

9. From the beginning of Plaintiff’s career through on or about June 19 or June 20, 2023, Mena directed discriminatory comments toward Plaintiff concerning Plaintiff’s actual and/or perceived ethnicity, ancestry, national origin, and religion on an almost daily basis.

10. Among other things, Mena referred to Plaintiff as a “terrorist,” a “camel jockey,” and a “sand nigger.”

11. Mena also told Plaintiff, in words or substance, that Plaintiff’s “people” or “kind” were responsible for the September 11, 2001 terrorist attacks.

12. These were not isolated, ambiguous, or occasional workplace remarks; rather, they expressly invoked Plaintiff’s protected characteristics, associated Plaintiff with terrorism because of those characteristics, and communicated that Plaintiff was foreign, dangerous, and inferior.

13. The frequency and severity of the comments humiliated Plaintiff, impaired his ability to work in a professional environment, and caused him reasonably and actually to perceive the NBPB workplace as hostile, discriminatory, and abusive.

PLAINTIFF’S COMPLAINTS AND THE TOWNSHIP’S RESPONSE

14. In or about June 2023, Plaintiff submitted a written memorandum through the Department’s chain of command documenting Mena’s discriminatory comments and requesting that the conduct be addressed.

15. On or about Wednesday, June 21, 2023, after Plaintiff submitted the memorandum, Mena was removed from the Traffic Unit/SRO office in which he had worked with Plaintiff.

16. Although Mena's relocation separated him from Plaintiff's immediate work area and the direct comments ceased, the Township did not complete or communicate a formal disciplinary resolution concerning the discrimination at that time.

17. The matter was initially investigated through NBPD Internal Affairs and was thereafter investigated by outside counsel retained by or on behalf of the Township.

18. Plaintiff cooperated with the investigations and provided true and accurate information concerning Mena's discriminatory treatment of him.

19. The investigation and disciplinary process remained unresolved for more than one year after Plaintiff submitted his memorandum.

20. In or about August 2024, after the outside investigation had concluded, Internal Affairs advised Plaintiff, in words or substance, that charges arising from Mena's discriminatory conduct had been sustained.

21. The outside investigator's report, underlying witness materials, findings, Internal Affairs records, and communications concerning the investigation and sustained charges are maintained by Defendants.

22. Chief Farley, then-Deputy Chief Corbisiero, the Township Attorney and the Township, and other members of NBPD command had actual notice of Plaintiff's complaints and the investigation and, no later than August 2024, knew that charges concerning Mena's discriminatory conduct had been sustained.

23. Despite that notice, the Township did not impose meaningful discipline or implement corrective measures reasonably calculated to address Mena's substantiated conduct for more than one year.

24. During that period, the Township continued to employ Mena in the same Department without consequences sufficient to communicate that race and religion-based harassment would not be tolerated or to protect Plaintiff from further discriminatory and retaliatory treatment.

25. Upon information and belief, Mena maintained a close personal and/or professional relationship with Chief Farley (and Farley maintained a close personal and/or professional relationship with the Township Attorney), and that/those relationship(s) influenced the Department's decision not to respond meaningfully, which contributed to the Department's prolonged and limited response to Plaintiff's substantiated complaint.

26. In or about August 2024, supervisors reported separate homophobic comments that Mena had made concerning another officer.

27. Upon information and belief, command personnel responded promptly to those later reports, and Mena retired from the NBPd effective on or about September 1, 2024.

28. The materially different and more immediate response to the later misconduct, together with the extended delay in formally resolving Plaintiff's substantiated complaint, supports a reasonable inference that command personnel selectively enforced workplace standards and treated Plaintiff's race and religion-based complaint as less worthy of protection.

RETALIATION AND MATERIALLY ADVERSE TREATMENT

29. Plaintiff engaged in activity protected by the LAD by submitting his June 2023 memorandum, opposing and reporting discriminatory harassment, participating in the Internal Affairs and outside investigations, objecting to the delayed and inadequate response after the charges were sustained, and requesting corrective intervention from command personnel.

30. Beginning on or about October 11, 2024, shortly after Plaintiff was advised that the discrimination charges had been sustained and after Mena's retirement, Plaintiff experienced a

pattern of materially adverse treatment affecting his assignments, professional stability, access to command personnel, and opportunities for advancement.

31. Within a period of approximately two (2) weeks, Plaintiff's assignment was changed three (3) times. Upon information and belief, the Township Attorney was aware of all of the above.

32. The rapid succession of involuntary assignment changes was not accompanied by any identified performance deficiency, documented disciplinary basis, or consistent operational explanation communicated to Plaintiff.

33. The repeated changes disrupted Plaintiff's professional continuity, diminished his standing within the Department, and materially interfered with the stability and development of his law enforcement career before his later employment forfeiture.

34. Upon information and belief, Chief Farley directed, approved, implemented, and/or ratified the repeated assignment changes, all with the tacit/express approval of the Township Attorney.

35. Upon information and belief, Deputy Chief Corbisiero participated in, approved, implemented, and/or knowingly acquiesced in the assignment changes and the adverse treatment that followed Plaintiff's complaints.

36. Plaintiff repeatedly requested a meeting with Chief Farley and/or Deputy Chief Corbisiero to address the investigation's sustained findings, the Department's failure to provide meaningful corrective relief, the repeated assignment changes, and the retaliation he was experiencing.

37. Plaintiff made at least three (3) formal meeting requests through email and telephone communications.

38. Those requests were not acknowledged, and Plaintiff was not provided the requested meeting or another meaningful avenue for command intervention.

39. On or about February 11, 2025, Plaintiff again sought command intervention concerning the discrimination, the Department's response, and the adverse treatment by asking his union delegate, Detective Kevin Rodriguez, to request a meeting with Chief Farley on Plaintiff's behalf.

40. Detective Rodriguez thereafter advised Plaintiff that Chief Farley denied the requested meeting and instructed Rodriguez to tell Plaintiff, in words or substance, "if Rasheed wants to sue, tell him to go ahead and sue; he won't be the first or the last."

41. Chief Farley's statement and refusal to meet support a reasonable inference that he knew Plaintiff was contemplating legal action concerning the discrimination and retaliation, deliberately declined to address Plaintiff's complaints, and was personally involved in the response to Plaintiff's protected activity.

42. The denied requests, including the February 11, 2025 request made through Plaintiff's union delegate, are not isolated personnel grievances. They form part of the same sequence in which command personnel knew of Plaintiff's protected complaints, left the substantiated harassment materially unremedied, changed Plaintiff's assignment three (3) times in approximately two (2) weeks, and denied him an explanation or corrective review.

43. The timing, frequency, absence of a communicated performance basis, refusal to provide command intervention, Chief Farley's statement concerning Plaintiff's contemplated lawsuit, and continued protection afforded to Mena support a reasonable inference that Plaintiff's protected activity was a motivating factor in the adverse treatment.

44. Defendants' conduct caused Plaintiff to experience humiliation, anxiety, emotional distress, professional instability, and damage to his reputation and career within the NBPd.

PLAINTIFF'S LITIGATION HOLD AND NOTICE OF TORT CLAIM

45. On February 26, 2025, Plaintiff's counsel formally notified the Township Attorney/Township of Plaintiff's prospective claims concerning ethnic harassment, retaliatory assignments, and related violations of New Jersey law, and directed the Township to preserve relevant documents and electronically stored information.

46. On or about March 5, 2025, Plaintiff served the Township with a Notice of Tort Claim identifying, among other things, the discriminatory hostile work environment, the outside investigation, retaliatory assignment changes, ignored requests for meetings with command, interference with Plaintiff's professional advancement, and the municipal employees alleged to be responsible.

47. The Township Attorney and the Township's governing and administrative authorities therefore received formal notice of Plaintiff's claims and of command personnel's alleged response before Plaintiff's employment with the Township ended.

PLAINTIFF'S REMOVAL FROM THE COMMUNITY RELATIONS UNIT

48. By Personnel Order 24-027, issued on February 2, 2024, Chief Farley selected Plaintiff as a part-time member of the NBPd Community Relations Unit.

49. The Community Relations Unit assigned selected patrol officers to participate in community events, meetings, and related activities outside or in addition to their regular patrol duties, providing members with opportunities to earn compensatory time and/or overtime.

50. In a February 6, 2024 group communication concerning the newly formed Unit, then-Lieutenant Alex Barrios, the Unit's commander, advised members that Chief Farley and

Captain Victor Queiro would participate in the group and stated, “Remember, this is the Chief’s baby, so we will be favored in some capacity.”

51. That statement reflected Chief Farley’s close identification with and influence over the Unit and reinforced that membership carried professional and economic value.

52. On May 14, 2025, approximately ten (10) weeks after Plaintiff’s counsel issued the litigation hold notice and approximately two (2) months after Plaintiff served his Notice of Tort Claim, Chief Farley issued Personnel Order 25-123 designating the Unit’s membership.

53. The May 14, 2025 order excluded Plaintiff from the Unit, retained several officers who had served with Plaintiff on the original roster, and added other officers.

54. Plaintiff was not advised of any performance deficiency, misconduct, operational necessity, or neutral selection criterion that justified his exclusion from the Unit.

55. Plaintiff’s removal deprived him of the status and professional opportunities associated with the Unit and of the opportunity to earn compensatory time and/or overtime through Unit activities.

56. The timing of the removal, Chief Farley’s prior statement regarding Plaintiff’s contemplated lawsuit, Chief Farley’s control over the Unit, the retention and addition of other officers, and the absence of a communicated legitimate reason support a reasonable inference that Plaintiff was removed because he opposed discrimination and formally asserted claims against the Township.

57. As a direct and proximate result of the conduct alleged herein, Plaintiff has suffered damages including humiliation, emotional distress, reputational and career harm, loss of professional opportunities, lost compensatory time and overtime opportunities, and other pre-

employment forfeiture economic and non-economic losses to be established through discovery and at trial.

FIRST CAUSE OF ACTION

*Violation of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-12(d)
Retaliation
As Against Defendant Township of North Bergen*

58. Plaintiff Siyam repeats and realleges the allegations set forth in the preceding paragraphs with the same force and effect as if each were fully set forth at length herein.

59. Plaintiff engaged in protected activity by submitting his June 2023 memorandum, opposing and reporting conduct forbidden by the LAD, participating in the Internal Affairs and outside investigations, objecting after he was advised in August 2024 that the charges had been sustained, requesting corrective intervention, retaining counsel, directing the preservation of evidence, and serving formal notice of his discrimination and retaliation claims.

60. The Township and its command personnel knew of Plaintiff's protected activity before the challenged assignment changes and related adverse treatment.

61. After and because Plaintiff engaged in protected activity, the Township subjected him to materially adverse action, including three (3) involuntary assignment changes within approximately two (2) weeks, professional destabilization and marginalization, denial of meaningful command intervention, removal from the Community Relations Unit after formal notice of his claims, loss of compensatory time and overtime opportunities, and interference with his pre-forfeiture career opportunities and working conditions.

62. Considered individually and cumulatively, the challenged actions were sufficiently material to dissuade a reasonable employee from reporting discrimination or participating in an investigation.

63. A causal connection is plausibly shown by Defendants' knowledge, the short interval between Plaintiff being advised in August 2024 that the charges were sustained and the October 2024 assignment changes, Chief Farley's February 2025 statement concerning Plaintiff's contemplated lawsuit, the timing of Plaintiff's May 14, 2025 removal from the Community Relations Unit after formal notice, the absence of identified performance or disciplinary reasons, the refusal to address Plaintiff's requests for intervention, and the prolonged protection afforded to Mena despite the substantiated complaint, and the materially different response to the later complaints concerning Mena.

64. To the extent Defendants rely upon operational or performance-based reasons for the challenged treatment, the timing, sequence, and disparate manner of the actions support a reasonable inference that those reasons did not fully and accurately explain the treatment and were pretextual.

65. As a direct and proximate result of the Township's retaliation, Plaintiff suffered emotional distress, humiliation, reputational harm, career harm, lost compensatory time and overtime opportunities, and other pre-forfeiture economic losses.

WHEREFORE Plaintiff Rasheed Siyam respectfully requests judgment against Defendant Township of North Bergen on his First Cause of Action as follows:

- a. for all compensatory and consequential damages available under the LAD, including pre-forfeiture economic losses, emotional distress, humiliation, reputational harm, and career harm;
- b. for punitive damages to the extent permitted by the LAD and other applicable law;
- c. for pre-judgment interest, post-judgment interest, statutory attorneys' fees, and costs of suit as permitted by law; and
- d. for such other and further relief as the Court deems just and proper.

SECOND CAUSE OF ACTION

*Violation of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-12(e)
Aiding and Abetting Retaliation
As Against Defendants Chief Robert J. Farley, Jr. and David Corbisiero*

66. Plaintiff Siyam repeats and realleges the allegations set forth in the preceding paragraphs with the same force and effect as if each were fully set forth at length herein.

67. The Township committed an underlying violation of the LAD by retaliating against Plaintiff for opposing discrimination, submitting his memorandum, participating in the investigations, requesting corrective intervention, and formally asserting his discrimination and retaliation claims.

68. Farley and Corbisiero each occupied a supervisory and command position, knew of Plaintiff's protected complaints and the substantiated investigation, and possessed authority to participate in or influence the Township's corrective response, Plaintiff's assignments, and the terms and conditions of Plaintiff's employment.

69. Chief Farley knowingly and substantially assisted the Township's retaliation through active and purposeful conduct, including protecting Mena after substantiation of Plaintiff's complaint, declining to implement meaningful corrective measures, directing or ratifying the repeated assignment changes, denying Plaintiff's February 2025 request for intervention while commenting upon Plaintiff's contemplated lawsuit, removing Plaintiff from the Community Relations Unit after formal notice of his claims, and permitting the adverse treatment to continue.

70. Deputy Chief Corbisiero knowingly and substantially assisted the Township's retaliation through active and purposeful conduct, including participating in, approving, implementing, and/or knowingly acquiescing in the repeated assignment changes after actual

notice of Plaintiff's protected activity and failing to provide command intervention despite Plaintiff's direct requests.

71. The individual Defendants' conduct went beyond their mere status as supervisors. Each knowingly used or exercised command authority in a manner that substantially assisted the Township's retaliation against Plaintiff.

72. As a direct and proximate result of Farley's and Corbisiero's aiding and abetting, Plaintiff suffered emotional distress, humiliation, reputational harm, career harm, lost compensatory time and overtime opportunities, and other pre-forfeiture economic losses.

WHEREFORE Plaintiff Rasheed Siyam respectfully requests judgment against Defendants Chief Robert J. Farley, Jr. and David Corbisiero on his Second Cause of Action as follows:

- a. for all compensatory and consequential damages available under the LAD;
- b. for punitive damages against the individual Defendants to the extent permitted by law;
- c. for pre-judgment interest, post-judgment interest, statutory attorneys' fees, and costs of suit as permitted by law; and
- d. for such other and further relief as the Court deems just and proper.

THIRD CAUSE OF ACTION

*Violation of the New Jersey Civil Rights Act, N.J.S.A. 10:6-1, et seq.
Intentional Deprivation of Equal Protection Rights Secured by Article I, Paragraph 1 of the New
Jersey Constitution
As Against Defendants Chief Robert J. Farley, Jr. and David Corbisiero*

73. Plaintiff repeats and realleges the allegations set forth in the preceding paragraphs with the same force and effect as if each were fully set forth at length herein.

74. Article I, Paragraph 1 of the New Jersey Constitution secures substantive equal protection rights, including the right to be free from intentional governmental discrimination based upon race, color, ethnicity, ancestry, national origin, and religion or creed.

75. At all relevant times, Farley and Corbisiero acted under color of New Jersey law and municipal authority by exercising the powers, access, supervisory authority, and command responsibilities of their NBPB positions.

76. Farley and Corbisiero had actual notice that Plaintiff had been subjected to express race, ancestry, national origin, and religion-based harassment and, no later than August 2024, knew that charges arising from that conduct had been sustained.

77. Despite that knowledge and their authority to act, Farley and Corbisiero intentionally participated in, ratified, and/or knowingly acquiesced in unequal treatment by selectively delaying meaningful resolution of Plaintiff's sustained race and religion-based complaint and using command authority to subject Plaintiff to or permit repeated adverse assignment treatment. In addition, Chief Farley denied Plaintiff command intervention after learning that Plaintiff contemplated suit and later removed Plaintiff from the Community Relations Unit after Plaintiff formally asserted protected-class claims.

78. The almost daily protected class harassment through June 2023 is relevant background. The August 2024 sustained findings, the materially different and more immediate response to Mena's later reported misconduct, the October 2024 assignment changes, Chief Farley's February 2025 statement concerning Plaintiff's contemplated lawsuit, the May 2025 removal of Plaintiff from the Community Relations Unit after formal notice, and the subsequent command level treatment of Plaintiff support a reasonable inference that the later unequal

treatment was intentional and motivated, at least in part, by Plaintiff's protected characteristics and his opposition to protected class discrimination.

79. This New Jersey Civil Rights Act ("NJCRA") violation is premised upon the individual Defendants' intentional discriminatory administration of their governmental authority and their knowing acquiescence in protected class based unequal treatment.

80. As a direct and proximate result of Farley's and Corbisiero's violations of the NJCRA, Plaintiff suffered emotional distress, humiliation, reputational harm, career harm, lost compensatory time and overtime opportunities, and other pre-forfeiture economic losses.

WHEREFORE Plaintiff Rasheed Siyam respectfully requests judgment against Defendants Chief Robert J. Farley, Jr. and David Corbisiero on his Third Cause of Action as follows:

- a. for compensatory and consequential damages permitted under the NJCRA;
- b. for punitive damages against the individual Defendants to the extent permitted by law;
- c. for pre-judgment interest, post-judgment interest, statutory attorneys' fees, and costs pursuant to N.J.S.A. 10:6-2(f); and
- d. for such other and further relief as the Court deems just and proper.

FOURTH CAUSE OF ACTION

*Violation of the New Jersey Civil Rights Act, N.J.S.A. 10:6-1, et seq.
Municipal Liability for Intentional Deprivation of Equal Protection Rights
As Against Defendant Township of North Bergen*

81. Plaintiff Siyam repeats and realleges the allegations set forth in the preceding paragraphs with the same force and effect as if each were fully set forth at length herein.

82. The Township is a public entity subject to suit under the NJCRA for constitutional deprivations caused by its official action, authorized decisionmakers, final policymaking or delegated authority, ratification, and/or municipal policy, practice, or custom.

83. The deprivation alleged herein resulted from official municipal action and not from respondeat superior alone. Chief Farley exercised final or delegated authority over Plaintiff's day-to-day assignments and the Department's operational response to Plaintiff's complaints, while the Township's appropriate administrative and governing authorities retained authority to review, correct, or ratify those decisions.

84. After the Township learned, no later than August 2024, that charges arising from Mena's discriminatory conduct had been sustained and later received formal written notice of Plaintiff's claims, its authorized officials and appropriate authority did not reverse, correct, or meaningfully remedy the delayed and selective response, the prolonged protection afforded to Mena, the adverse assignment treatment of Plaintiff, or Chief Farley's May 14, 2025 personnel order removing Plaintiff from the Community Relations Unit.

85. The Township's extended delay in formally resolving Plaintiff's sustained protected class harassment complaint, materially different response to later misconduct by the same employee, selective enforcement of workplace standards, failure to correct command level decisions after formal notice, removal of Plaintiff from the Community Relations Unit, and ratification of the continuing response constituted official action and/or a municipal practice or custom of deliberate indifference to and intentional acquiescence in the deprivation of Plaintiff's equal protection rights.

86. The Township's official acts, omissions, authorized decisions, practices, customs, and ratification were a moving force behind the intentional unequal treatment of Plaintiff and the damages alleged herein.

87. As a direct and proximate result of the Township's violation of the NJCRA, Plaintiff suffered emotional distress, humiliation, reputational harm, career harm, lost compensatory time and overtime opportunities, and other pre-forfeiture economic losses.

WHEREFORE Plaintiff Rasheed Siyam respectfully requests judgment against Defendant Township of North Bergen on his Fourth Cause of Action as follows:

- a. for compensatory and consequential damages permitted under the NJCRA;
- b. for pre-judgment interest, post-judgment interest, statutory attorneys' fees, and costs pursuant to N.J.S.A. 10:6-2(f); and
- c. for such other and further relief as the Court deems just and proper.

THE TOSCANO LAW FIRM, LLC
Attorneys for Plaintiff,
Rasheed Siyam

Dated: August 7, 2026

By: s/ Patrick P. Toscano, Jr.
 Patrick P. Toscano, Jr.

s/ Matthew J. Toscano
 Matthew J. Toscano

DEMAND FOR TRIAL BY JURY

Pursuant to R. 4:35-1, Plaintiff Rasheed Siyam herein demands a trial by jury on all issues so triable.

THE TOSCANO LAW FIRM, LLC
Attorneys for Plaintiff,
Rasheed Siyam

Dated: August 7, 2026

By: s/ Patrick P. Toscano, Jr.
Patrick P. Toscano, Jr.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4 and R. 4:5-1(c), Patrick P. Toscano, Esq. is hereby designated as trial counsel for The Toscano Law Firm, LLC, attorneys for Plaintiff Rasheed Siyam.

THE TOSCANO LAW FIRM, LLC
Attorneys for Plaintiff,
Rasheed Siyam

Dated: August 7, 2026

By: s/ Patrick P. Toscano, Jr.
Patrick P. Toscano, Jr.

DEMAND FOR DISCOVERY OF INSURANCE INFORMATION

Pursuant to R. 4:10-2(b), demand is made that Defendants disclose to Plaintiff's attorneys whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment entered in this action, or to indemnify or reimburse payments made to satisfy such a judgment, and provide true copies of those agreements or policies, including all declaration sheets. This demand includes primary coverage and any employment practices liability, excess, and umbrella coverage.

THE TOSCANO LAW FIRM, LLC
Attorneys for Plaintiff,
Rasheed Siyam

Dated: August 7, 2026

By: s/ Patrick P. Toscano, Jr.
Patrick P. Toscano, Jr.

DEMAND TO PRESERVE EVIDENCE

Defendants are hereby directed and demanded to preserve all physical and electronic information pertaining in any way to the subject matter of this litigation, Plaintiff's claims, and the defenses thereto, including Plaintiff's June 2023 memorandum; records concerning Mena's June

21, 2023 removal from the Traffic Unit/SRO office; the outside investigation file and findings; Internal Affairs records; records reflecting the August 2024 sustained charges; records concerning the later homophobic comments attributed to Mena and his September 2024 retirement; witness statements; disciplinary and corrective action records; assignment and transfer records; Community Relations Unit personnel orders, rosters, recruitment communications, event assignments, attendance records, compensatory time records, overtime records, and related communications; promotion-related records; emails; text messages; telephone logs; calendars; memoranda; personnel and command communications; electronically stored information and metadata; cloud stored information; audio and video recordings; photographs; social media or work platform entries; and all other documents, tangible things, and data relating to Plaintiff, Mena, the individual Defendants, the discrimination complaints, the investigations, the Township's corrective response, the assignment changes, Plaintiff's requests for command intervention, and Plaintiff's removal from the Community Relations Unit.

THE TOSCANO LAW FIRM, LLC
Attorneys for Plaintiff,
Rasheed Siyam

Dated: August 7, 2026

By: s/ Patrick P. Toscano, Jr.
Patrick P. Toscano, Jr.

CERTIFICATION

Pursuant to R. 4:5-1, I hereby certify, based on present knowledge, that the discrimination and retaliation claims asserted in this action are not the subject of any other civil action pending in any court and are not the subject of any pending arbitration proceeding. I further certify that no other civil action or arbitration concerning the same controversy is presently contemplated.

Pursuant to R. 4:28, I certify, based on present knowledge, that I am aware of no other party who should be joined in this action based upon the same transactional facts, except for the presently unidentified John Doe Defendants identified in the Complaint.

Pursuant to R. 1:38-7(b), I certify, based on present knowledge, that confidential personal identifiers have been redacted from this document and will be redacted from future submissions as required by the Court Rules.

THE TOSCANO LAW FIRM, LLC
Attorneys for Plaintiff,
Rasheed Siyam

Dated: August 7, 2026

By: s/ Patrick P. Toscano, Jr.
Patrick P. Toscano, Jr.