

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BARBER, DEVON TYLER

COMPLAINT

(Enter above the full name of the plaintiff in this action)

v.

Civil Action No. _____

(To be supplied by the Clerk of the Court)

JOSEPH HARDEMON JR.

JOSEPH HARDEMON SR.

Joers Painting and Renovations(11)

(Enter the full name of the defendant of defendants in this action)

INSTRUCTIONS; READ CAREFULLY

1. This complaint must be legibly handwritten or typewritten, signed by the plaintiff and subscribed to under penalty of perjury as being true and correct. All questions must be answered concisely in the proper space on the form. Where more space is needed to answer any question, attach a separate sheet.
2. In accordance with Rule 8 of the Federal Rules of Civil Procedure, the complaint should contain (1) a short and plain statement of the grounds upon which the court's jurisdiction depends, (2) a short plain statement of the claim showing that you are entitled to relief, and (3) a demand for judgment for the relief which you seek.
3. You must provide the full name of each defendant or defendants and where they can be found.
4. You must send the original and one copy⁴⁵ of the complaint to the Clerk of the District Court. You must also send one additional copy of the complaint for each defendant to the Clerk. Do not send the complaint directly to the defendants.
5. Upon receipt of a fee of \$402.00 (a filing fee of \$350.00, and an administrative fee of \$52.00), your complaint will be filed. You will be responsible for service of a separate summons and copy of the complaint on each defendant. See Rule 4, Federal Rule of Civil Procedure.

6. If you cannot prepay the \$402.00 fee, you may request permission to proceed in forma pauperis in accordance with the procedures set forth in the application to proceed in forma pauperis. See 28 U.S.C. §1915. (If there is more than one plaintiff, each plaintiff must separately request permission to proceed in forma pauperis.)

7. If you are given permission to proceed in forma pauperis, the \$52.00 Administrative Fee will not be assessed. The Clerk will prepare and issue a copy of the summons for each defendant. The copies of summonses and the copies of the complaint which you have submitted will be forwarded by the Clerk to the United States Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can locate and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

QUESTIONS TO BE ANSWERED

1a. Jurisdiction is asserted pursuant to (CHECK ONE)

☒ 42 U.S.C. §1983 (applies to state prisoners)

☐ Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics, 403 U.S. 388 (1971) and 28 U.S.C. § 1331 (applies to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

up to judge

1b. Indicate whether you are a prisoner or other confined person as follows:

☒ Pretrial detainee

☐ Civilly-committed detainee

☐ Immigration detainee

☐ Convicted and sentenced state prisoner

☐ Convicted and sentenced federal prisoner

☐ Other: (please explain) _____

2. Previously Dismissed Federal Civil Actions or Appeals

If you are proceeding in forma pauperis, list each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility, that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted. Please note that a prisoner who has on three or more prior occasions, while detained in any facility, brought an action or appeal in a federal court that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted, will be denied in forma pauperis status unless that prisoner is under imminent danger of serious physical injury. See 28 U.S.C. § 1915(g).

a. Parties to previous lawsuit:

Plaintiff(s): N/A

Defendant(s): _____

b. Court and docket number: _____

c. Grounds for dismissal: ☐ frivolous ☐ malicious
☐ failure to state a claim upon which relief may be granted

d. Approximate date of filing lawsuit: _____

e. Approximate date of disposition: _____

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on separate sheets.

3. Place of Present Confinement? ATLANTIC COUNTY JUSTICE FACILITY

4. Parties

(In item (a) below, place your name in the first blank and place your present address in the second blank. Do the same for additional Plaintiffs, if any.)

a. Name of plaintiff: DEVON BARBER (TYLER)
 (first) (last) (middle)

40:309 New Leaf Court, Galloway, NJ 08205
and/or

Address: 5060 Atlantic Ave, Mays Landing, New Jersey [08330]

Inmate #: 01-284791 / BSI # 236914

b. First defendant:

Name: JOSEPH HARDEMON (JR.)

Official position: H.I.C. in the State of New Jersey

Place of employment: JOES PAINTING AND RENOVATIONS 11

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

Violated ~~off~~ contract of Tenancy which originally was 60 days live in work agreement for compensation on completed projects (i.e. painting, tile work, paint prep, cleanup, yardwork, drywall installation, etc...)

c. Second defendant:

Name: JOSEPH HARDEMON (SR.)

Official position: H.I.C. in the State of New Jersey

Place of employment: JOES PAINTING AND RENOVATIONS

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

Violated work agreement with Laborer/plaintiff.
~~by dishonorable manipulation.~~ Violated due process of law removed and used plaintiff's private property without eviction notice. Cruel work environment did not pay for services and his work crew killed my family Goliath and Jumper.

d. If there are more than two defendants, attach a separate sheet. For each defendant specify: (1) name, (2) official position, (3) place of employment, and (4) involvement of the defendant.

5. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in the Statement of Claims on page 6.

☐ Yes ☒ No

If your answer is "Yes," briefly describe the steps taken, including how relief was sought, from whom you sought relief, and the results.

I was stuck in survival mode. I believed I filed a construction lien and serviced the Secretary of State with a negotiable instrument to transfer ownership of the property.
view last blog post on/at: Divine-Tiller Church
please www.

If your answer is "No," briefly explain why administrative remedies were not exhausted.

I did not know how to enforce our informal work agreement.
Everything is proven in our text messages. Please
subpoena

6. Statement of Claims

(State here as briefly as possible the facts of your case. Describe how each defendant violated your rights, giving dates and places. If you do not specify how each defendant violated your rights and the date(s) and place of the violations, your complaint may be dismissed. Include also the names of other persons who are involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach a separate sheet if necessary.)

Joe Jr. was a great friend growing up, he has hurt me before but my forgiving spirit used all as lessons. I started working with him more than three years ago and never had a problem with being paid. The only difference from now is that I was more vulnerable (without transportation).
Joe spoke highly of me and asked me to move in to his renovation project that was running behind.

Corporate co-op

On or around June 9th

He asked me to live at 1525 W. Aloe Street, EHC, New Jersey because he trusted my work ethics and ability to finish his project (his investor wanted it done ASAP). He said I would be comfortable, I would be paid per project, and that he would fix the water pump and install a hot water heater asap. I moved in with my belongings and my pets and got to work immediately. I had to do a lot so that my girlfriend wouldn't freak out when she came to see me. I outlined the work I did and served Joe with an invoice which is on proton drive for the Court to view, hyper-linked within a blog post at www.Divine-Filler.church the password to download the document is "369".

Joe SR. encouraged Joe JR. not to pay me because I was "living" at the construction site, but we had an agreement. I was fine paying rent at my parents. Joe never fixed the water pump, never turned on hot water, and he did not pay me for any of my labor or financial improvements including ~~two~~ air conditioning units, a lawnmower, a bench for the porch, and other things. On July 11, 2022 Joe and his crew threw all my property out of the house and killed my two pets (domestic) smashed their enclosures.

They did not pay me, they did not evict me lawfully, they damaged property and they killed two members of my immediate family.

7. Relief See Attached

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

I petition the Court to Subpoena text messages between Plaintiff and Defendants. For relief I petition the court to require Defendants and or their business entities to compensate me/plaintiff for the

(Please grant me compensation to buy a place to dwell, in peace. Or transfer 1525 W. Aloe St to plaintiff.)

labor ordered, emotional distress of living in unsafe and hostile conditions, for the murder of Goliath and Jumper, relief of the defamation of Character.

I request the Court to order defendants business insurance to settle a fair claim for the lasting impact of this Civil Rights injury against my Life, Liberty, pursuit of happiness. I request the Court to observe the impact it has had on Kelly Tyrell and my relationship with her.

8. Do you request a jury or non-jury trial? (Check only one)

☒ () Jury Trial () Non-Jury Trial
 I request relief from ^{injuries} injury. I leave it to the Judge.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 9TH day of OCTOBER, 2022

BARBER, DEVON (tyler)

Signature of plaintiff*

(*EACH PLAINTIFF NAMED IN THE COMPLAINT MUST SIGN THE COMPLAINT HERE. ADD ADDITIONAL LINES IF THERE IS MORE THAN ONE PLAINTIFF. REMEMBER, EACH PLAINTIFF MUST SIGN THE COMPLAINT).

THIS FORM MUST BE USED BY A PRISONER APPLYING TO PROCEED IN FORMA PAUPERIS IN A CIVIL RIGHTS CASE

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

BARBER, DEVON TYLER

(Plaintiff in this action)

**AFFIDAVIT OF POVERTY
and ACCOUNT CERTIFICATION
(CIVIL RIGHTS)**

v.

JOSEPH HARDEMON JR.

JOSEPH HARDEMON SR.

Joer Painting and Renovations

Joer Painting and Renovations 11

(Defendant(s) in this action)

Civil Action No. _____
(To be supplied by the Clerk of the Court)

DNJ-Pro Se-007-A-(Rev.12/2020)

Instructions:

The Clerk will not file a civil complaint unless the person seeking relief pays the entire filing fee (currently \$350) and an administrative fee (currently \$52) in advance, or the person applies for and is granted in forma pauperis status pursuant to 28 U.S.C. § 1915. See Local Civil R. 5.1(f). A prisoner who seeks to proceed in forma pauperis must submit to the Clerk (1) a completed affidavit of poverty and (2) a copy of the trust fund account statement for the prisoner for the six month period immediately preceding the filing of the complaint, obtained from and certified as correct by the appropriate official of each prison at which the prisoner is or was confined for the preceding six months. See 28 U.S.C. § 1915(a)(2).

If the Judge enters an order granting a prisoner's application to proceed in forma pauperis, then the order will assess the filing fee (currently \$350) against the prisoner and collect the fee by directing the agency having custody of the prisoner to deduct an initial partial filing fee equal to 20% of the greater of the average monthly deposits to the prison account or the average monthly balance in the prison account for the six-month period immediately preceding the filing of the complaint, as well as monthly installment payments equal to 20% of the preceding month's income credited to the account for each month that the balance of the account exceeds \$10.00, until the entire filing fee has been paid, regardless of the outcome of the proceeding. See 28 U.S.C. § 1915(b).

The prisoner must complete all questions in the following affidavit, sign and date the affidavit, and then obtain the signature of the appropriate prison official who certifies the prison account statement. After the appropriate prison official certifies your prison trust fund account statement(s), you must attach the prison account statement(s) to this application, for each prison or jail wherein you were incarcerated during the previous six months. If your application to proceed in forma pauperis is incomplete, then the Court may enter an order denying your application without prejudice and administratively terminating your case without filing the complaint.

DNJ-ProSe-007-A-(Rev.12/2020)

THIS FORM MUST BE USED BY A PRISONER APPLYING TO PROCEED IN FORMA PAUPERIS IN A CIVIL RIGHTS CASE

In support of this application, I state the following under the penalty of perjury:

1. I, DEVON TYLER BARBER (print your name), declare that I am the
☒ Plaintiff / movant ☐ Other

in the above-entitled proceeding; that, in support of my request to proceed without being required to prepay fees, costs, or give security therefor, I state that because of my poverty, I am unable to prepay the costs of said proceeding or give security therefor; that I believe I am entitled to relief.

2. The nature of my claim or the issues I intend to present on appeal are briefly stated as follows:

Involuntary servitude (Employer/contractor did not pay for services/labor that they ordered via contract through "JPNR"),
Murder of two domestic pets and other damages to life and property.

3. List dates and places of confinement for the immediately preceding six months:

Dates of Confinement

Places of Confinement

01/05/1998-PRESENT

STATE OF NEW JERSEY

07/11/2022-PRESENT

ATLANTIC COUNTY JUSTICE FACILITY

For each institution in which you have been confined for the preceding six months, you must obtain a copy of your prison account and the signature of the appropriate prison official (see certification on p. 3).

4. Are you employed at your current institution? ☐ Yes ☒ No

Do you receive any payment or money from your current institution? ☐ Yes ☒ No

If Yes, state how much you receive each month: N/A

5. In the past 12 months, have you received any money from any of the following sources?

			Amount
a. Business, profession, or other self-employment	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<u>0</u>
b. Rent payments, interest, or dividends	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<u>0</u>
c. Pensions, annuities, or life insurance payments	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<u>0</u>
d. Disability or workers compensation payments	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<u>0</u>
e. Gifts or inheritances	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<u>0</u>
f. Any other sources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<u>\$21 Silver Coin</u>

THIS FORM MUST BE USED BY A PRISONER APPLYING TO PROCEED IN FORMA PAUPERIS IN A CIVIL RIGHTS CASE

6. Other than your prison account, do you have cash or a checking or savings account in your name?

If "Yes," state the total in the account at this time: 0 ☒ Yes ☐ No

7. Do you own any other assets or property? ☐ Yes ☒ No

If "Yes," please describe: N/A

8. I, BARBER, DEVON - 284791
(Print or Type Name and Number of Prisoner)

declare under penalty of perjury that the aforesaid statements made by me are true and correct. I authorize the agency having custody over me to assess, withdraw from my prison account, and forward to the Clerk of the District Court for the District of New Jersey (1) an initial partial filing fee equal to 20% of the greater of the average monthly deposits to my prison account or the average monthly balance in my prison account for the six-month period immediately preceding the filing of the complaint, and (2) payments equal to 20% of the preceding month's income credited to my prison account each month the amount in the account exceeds \$10.00, until the \$ 350.-- fee is paid. 28 U.S.C. § 1915(b)(1) and (2).

10/09/2022
DATE

By: XTX, A.R.R.;
DEVON TYLER BARBER
SIGNATURE OF PRISONER

THIS PORTION OF YOUR APPLICATION SHALL NOT BE LEFT BLANK.
IF THIS PORTION IS NOT COMPLETED, YOUR APPLICATION WILL BE DENIED WITHOUT PREJUDICE

ACCOUNT CERTIFICATION SIGNED BY PRISON OFFICIAL

I, L. Dougherty (print name), certify that the attached trust fund account statement (or institutional equivalent) is a true and correct copy.

10/12/22
DATE

[Signature] (Signature)

Account Clerk (Title)

(Note to Applicant: forward a copy of this account certification form to each institution in which you have been confined for the six-month period prior to the date of this application)

Burber Devon # 284791 10/11/22 LD

ACCOUNT CERTIFICATION FORM

I certify that the attached trust finds account statement (or institutional equivalent) is true and correct

10/11/22
Date

[Signature]
Authorized Officer of Institution

NOTICE TO PRISON OFFICIALS: Pursuant to the Prison Litigation Reform Act, you will be obligated to forward payments to the appropriate United States District Court if the prisoner herein is granted leave to proceed in forma pauperis, 28 U.S.C. § 1915(b)(2) (April 26, 1996). Pursuant to that statute, once an initial partial fee is paid, the prison official in charge of prisoner's account must forward payments of 20% of the income credited to the prisoner's account during the preceding month, each month the amount exceeds \$10.00, until the entire filing fee has been paid.

Inmate Account Summary Legacy Report
Atlantic County Jail

Today's Date: 10/11/2022

Page 1 of 2

Last Name First Name Middle Name Affix Booking#
BARBER DEVON 01-284791

Transaction Date/Time	Transaction Type	Transaction Amount	Code	Check#	Deposit From/Withdrawal To	Running Balance	Receipt Number
07/11/2022 22:18	Withdrawal	-124.66	RHC		From: 01-270190 To: 01-284791	-124.66	3482160
Authorizing Employee: 110709					Document Locator Number: From: 01-270190 To: 01-284791		
07/11/2022 22:18	Withdrawal	-19.50	RHC		From: 01-270190 To: 01-284791	-144.16	3482161
Authorizing Employee: 110709					Document Locator Number: From: 01-270190 To: 01-284791		
07/11/2022 22:18	Withdrawal	-17.00	RHC		From: 01-270190 To: 01-284791	-161.16	3482162
Authorizing Employee: 110709					Document Locator Number: From: 01-270190 To: 01-284791		
07/11/2022 22:18	Withdrawal	-55	RHC		From: 01-270190 To: 01-284791	-161.71	3482163
Authorizing Employee: 110709					Document Locator Number: From: 01-270190 To: 01-284791		
07/11/2022 22:19	Withdrawal	-50.00	UF		BOOKING FEE	-211.71	3482165
Authorizing Employee:					Document Locator Number: AUTO GENERATED		
07/17/2022 16:21	Withdrawal	-7.00	BM		RN-7/15/2022	-218.71	3482948
Authorizing Employee: N0576					Document Locator Number:		
07/27/2022 18:44	Withdrawal	-7.00	BM		RN-7/24/2022	-225.71	3484396
Authorizing Employee: 000011					Document Locator Number:		
08/01/2022 00:00	Withdrawal	-50.00	UF		USER FEE	-275.71	3485111
Authorizing Employee:					Document Locator Number: AUTO GENERATED		
08/04/2022 10:13	Withdrawal	-3.25	CO		COMMISSARY SUMMARY POSTING	-278.96	3486067
Authorizing Employee: K24					Document Locator Number: COMMISSARY SUMMARY POSTING		
08/18/2022 09:09	Withdrawal	-3.25	CO		COMMISSARY SUMMARY POSTING	-282.21	3488385
Authorizing Employee: K24					Document Locator Number: COMMISSARY SUMMARY POSTING		
08/22/2022 17:50	Withdrawal	-10.00	BM		Physician 08/22/2022	-292.21	3489094
Authorizing Employee: N0602					Document Locator Number:		
08/22/2022 18:09	Withdrawal	-10.00	BM		RN+Meds 08/20/2022	-302.21	3489112
Authorizing Employee: N0602					Document Locator Number:		
08/25/2022 18:27	Withdrawal	-10.00	BM		Dentist 08/24/2022	-312.21	3489739
Authorizing Employee: N0602					Document Locator Number:		
08/25/2022 19:21	Withdrawal	-7.00	BM		RN 08/24/22	-319.21	3489746
Authorizing Employee: N0602					Document Locator Number:		
08/22/2022 19:02	Withdrawal	-7.00	BM		RN 08/29/2022	-326.21	3490361
Authorizing Employee: N0460					Document Locator Number:		

Page 2 of 2

First Name	Middle Name	Affix	Booking#
DEVON			01-284791

Transaction Date/Time	Transaction Type	Transaction Amount	Code	Check#	Deposit From/Withdrawal To	Running Balance	Receipt Number
09/01/2022 00:00	Withdrawal	-50.00	UF	USER FEE		-376.21	3490667
Authorizing Employee:					Document Locator Number:	AUTO GENERATED	
09/01/2022 10:08	Withdrawal	-3.25	CO	COMMISSARY SUMMARY POSTING		-379.46	3491275
Authorizing Employee: K24					Document Locator Number:	COMMISSARY SUMMARY POSTING	
09/11/2022 18:48	Withdrawal	-7.00	BM	RN/9/11/22		-386.46	3492803
Authorizing Employee: N0576					Document Locator Number:		
09/14/2022 20:39	Withdrawal	-10.00	BM	RN+MEDS 09/14/2022		-396.46	3493332
Authorizing Employee: N0631					Document Locator Number:		
09/15/2022 09:24	Withdrawal	-3.25	CO	COMMISSARY SUMMARY POSTING		-399.71	3493457
Authorizing Employee: K24					Document Locator Number:	COMMISSARY SUMMARY POSTING	
09/22/2022 08:51	Withdrawal	-3.25	CO	COMMISSARY SUMMARY POSTING		-402.96	3494601
Authorizing Employee: K24					Document Locator Number:	COMMISSARY SUMMARY POSTING	
09/29/2022 09:19	Withdrawal	-3.25	CO	COMMISSARY SUMMARY POSTING		-406.21	3495918
Authorizing Employee: K24					Document Locator Number:	COMMISSARY SUMMARY POSTING	
10/01/2022 00:00	Withdrawal	-50.00	UF	USER FEE		-456.21	3496483
Authorizing Employee:					Document Locator Number:	AUTO GENERATED	
10/05/2022 10:44	Deposit	100.00	MO	Sherrl barber		-356.21	3497451
Authorizing Employee: 06906					Document Locator Number:	97139803-4	
10/06/2022 09:01	Withdrawal	-3.25	CO	COMMISSARY SUMMARY POSTING		-359.46	3497649
Authorizing Employee: K24					Document Locator Number:	COMMISSARY SUMMARY POSTING	
10/07/2022 08:52	Withdrawal	-46.74	CP	Keefe Commissary		-406.20	3497853
Authorizing Employee: KCN					Document Locator Number:		
10/08/2022 11:11	Deposit	3.63	CR	Keefe Commissary		-402.57	3498157
Authorizing Employee: KCN					Document Locator Number:		
Total Withdrawals		-506.20					
Total Deposits		103.63					

I, Devon Tyler Barber, state and affirm the following to be true and correct to the best of my knowledge and awareness. The defendants, Joseph Hardemon Junior, Joseph Hardemon Senior, Joes Painting and Renovations, and Joes Painting and Renovations II are all doing business within the United States under regulation, license and insurance through the good faith of the State of New Jersey. The defendants are in violation of Federal and State Law. Defendants subjected plaintiff to unsafe work conditions through involuntary servitude, a dishonor of work agreement. Defendants agreed to pay per project fair compensation. Defendants encouraged plaintiff to "live comfortable" at the construction site to accomplish more work because they were behind on their time line. Plaintiff accomplished and completed projects ordered by defendants. Work agreement was created via textual obligation between 312-550-1338 and defendant Joseph Hardemon Juniors cell phone within the State of New Jersey on or around the beginning of the month of June, 2022. Denial of compensation is puts defendants in violation of ~~or~~ the United States Constitution Amendment 13, New Jersey State Constitution Article I Section 20, and NJ Statute 4:22-17(a)(1). Defendants created a tenancy agreement and violated plaintiff(s) right of Due Process by unlawfully

removing private property from plaintiff's residence. Defendants damaged private property and needlessly killed two of plaintiff's family members. Plaintiff can and will provide evidence of the love, trust, and care Goliath and Jumper shared with plaintiff. The "release" of

7 Relief)

Plaintiff is seeking relief from the defamation of character, unpaid labor, loss of ~~domestic~~^{life} pets, theft of property, and compensation for emotional distress.

Plaintiff requests this Court to Subpoena text messages between defendants and plaintiff, ~~as follows~~: Plaintiff at 312-550-1338 and defendant Joseph Hardemon at 609-592-0823 and defendant Joseph Hardemon at 609-965-2392. Please view work agreement, denial of owed compensation, and texts that lead to plaintiff's emotional breakdown which subsequently lead to plaintiff's arrest. After reading the lies and inconsistencies in the criminal complaint signed by the Hardemons I clearly see that they are covering for their violations. Please notice that I've worked with them for years under SSN 138-04-6917. They wanted me removed from the property without a lawful eviction so they lied and said that they believe I have hate in my heart by claiming what they did in Galloway Township Police Department Incident Report # 22-023620. Defendants initiated a kidnapping, to avoid Due Process, causing plaintiff physical, emotional, and psychological harm. LEXIS 95

4:22-17(9)(1)

I, Devon Tyler Barber, state and affirm that Joseph Hardemon Junior and Joseph Hardemon Senior doing business within the United States under license and regulation of the State of New Jersey operating as 'Joes Painting and Renovations' and 'Joes Painting and Renovations II' are in violation of our law. The defendants have injured plaintiff in violation of United States Constitution Amendment thirteen by creating a work agreement and thereafter labor was initiated and completed denied plaintiff the fair compensation owed by obligation and law. This action also being a violation of New Jersey State Constitution Article I Section 23. Defendants created a landlord tenant agreement within plaintiff's work agreement to renovate the property '1525 W Aloe Street'. Defendants are in violation of plaintiff's right to Due Process, in violation of United States Constitution Amendment fourteen and New Jersey State Constitution Article I section 20. Defendants breach, search, seizure, theft, and damage of private property, that was stored at 1525 W Aloe Street was an act of ~~commercial~~ unlawful eviction to provoke a vulnerable member of society to act out of character.

*7)

* See Relief plaintiff is seeking on obverse. *