



c/o 39.465848, -74.497040



Atlantic County, New Jersey



# Nihilo nisi cruce

CERTIFICATION / AFFIDAVIT

Pursuant to R. 1:4-4 | Under Penalty of Perjury

I, Devon Tyler Barber, hereby certify and affirm the following to be true and correct to the best of my knowledge, understanding, and belief:

1. I am the Petitioner in this matter and the same individual referenced in Docket Nos. **ATL-22-002292-001** and **ATL-22-002313-001**.
2. I was arrested and charged in 2022 shortly after seeking unpaid wages for skilled labor performed under an oral and text-based agreement with Joe's Painting and Renovation 11 LLC. Upon contacting their investor regarding nonpayment, I was retaliated against and criminally charged.
3. I later discovered that Joseph Hardemon Sr., the State's primary accuser, had a prior conviction for aggravated sexual assault of a minor—a material fact never disclosed by the prosecution in violation of *Brady v. Maryland*, *Giglio v. United States*, and related New Jersey law.
4. Upon arrest, I was subjected to solitary confinement and extended medical lockdown for over 40 days, denied clean water, basic nutrition, legal access, and humane conditions. I suffered infestation, weight loss, and emotional trauma. Counsel advised my only way out was to plead guilty.
5. I was never informed of the appeals process or deadlines, nor provided legal support. Only during my lawful estate correction in **ATL-L-000979-25** did I learn of my right to challenge the plea.
6. I filed *Post-Conviction Relief* in **ATL-24-001934** separately under procedural confusion and delay. Though independently filed, it arises from the same retaliatory prosecution, coerced plea, and unconstitutional suppression of exculpatory evidence. I respectfully ask this Court to treat all matters in equity.
7. On the day in question, I had a working iPhone that was lost or stolen, was driving a work truck for another contractor who valued my labor, and was not trespassing. My electric mower, air conditioning units, and aquariums were destroyed by Joseph Hardemon Jr.'s crew. He was injured after tripping over tanks they mishandled, and my pets were killed in the unlawful eviction. I had been permitted to live on-site to complete skilled work—not as a squatter or threat, but as a laborer who was later defamed and deprived.

I declare under penalty of perjury that the foregoing is true, correct, and submitted in good faith.

/s/ Devon Tyler Barber  
 Devon Tyler Barber  
 Date: June 18, 2025