



New Jersey Judiciary  
Superior Court - Appellate Division  
**Amended Notice of Appeal**

|   |                                       |  |                                     |  |
|---|---------------------------------------|--|-------------------------------------|--|
| TITLE IN FULL (AS CAPTIONED BELOW)<br><b>CHARLES KRATOVIL<br/>V.<br/>CITY OF NEW BRUNSWICK AND ANTHONY<br/>CAPUTO</b> | ATTORNEY / LAW FIRM / PRO SE LITIGANT |  |                                     |  |
|   |                                       | NAME<br><b>ALEXANDER R SHALOM, Esq.</b>                          |                                     |  |
|   |                                       | STREET ADDRESS<br><b>570 BROAD ST, 11TH FLOOR P.O. BOX 32159</b> |                                     |  |
| CITY<br><b>NEWARK</b>   | STATE<br><b>NJ</b>                    | ZIP<br><b>07102</b>  | PHONE NUMBER<br><b>973-854-1720</b> |  |
| EMAIL ADDRESS<br><b>ASHALOM@ACLU-NJ.ORG<br/>COURTFILING@ACLU-NJ.ORG</b>   |                                       |  |                                     |  |

|  |   |  |
|--|---|--|
| <b>ON APPEAL FROM</b>                          |   |  |
| TRIAL COURT JUDGE<br><b>JOSEPH L. REA, JSC</b> | TRIAL COURT OR STATE AGENCY<br><b>MIDDLESEX</b> | TRIAL COURT OR AGENCY NUMBER<br><b>MID-L-3896-23</b> |

Notice is hereby given that **CHARLES KRATOVIL** appeals to the Appellate Division from a  Judgment or  Order entered on **09/21/2023** in the  Civil  Criminal or  Family Part of the Superior Court  Tax Court or from a  State Agency decision entered on \_\_\_\_\_

If not appealing the entire judgment, order or agency decision, specify what parts or paragraphs are being appealed.

\*\*\*EXPLAIN BRIEFLY THE REASON FOR AMENDING THE NOTICE OF APPEAL

**There is an error in the case caption. The word "civil" was added inadvertently before plaintiff-appellant's name.**

For criminal, quasi-criminal and juvenile actions only:

Give a concise statement of the offense and the judgment including date entered and any sentence or disposition imposed:

This appeal is from a  conviction  post judgment motion  post-conviction relief  pre-trial detention  
 If post-conviction relief, is it the  1st  2nd  other \_\_\_\_\_ specify

Is defendant incarcerated?  Yes  No

Was bail granted or the sentence or disposition stayed?  Yes  No

If in custody, name the place of confinement:

Defendant was represented below by:

(\*) truncated due to space limit. Please find full information in the additional pages of the form.

Public Defender     self     private counsel \_\_\_\_\_

specify

Notice of appeal and attached case information statement have been served where applicable on the following:

|                              | Name                      | Date of Service   |
|------------------------------|---------------------------|-------------------|
| Trial Court Judge            | <b>JOSEPH L. REA, JSC</b> | <b>09/27/2023</b> |
| Trial Court Division Manager | <b>MIDDLESEX</b>          | <b>09/27/2023</b> |

Tax Court Administrator

State Agency

Attorney General or Attorney for other  
Governmental body pursuant to  
R. 2:5-1(b)

Other parties in this action:

| Name and Designation | Attorney Name, Address and Telephone No. | Date of Service |
|----------------------|--|-----------------|
|----------------------|--|-----------------|

|                         |   |                   |
|-------------------------|---|-------------------|
| <b>CHARLES KRATOVIL</b> | <b>JEANNE M LOCICERO, Esq.<br/>AMERICAN CIVIL LIBERTIES UNION OF NEW<br/>JERSEY FOUNDATION<br/>570 BROAD ST, 11TH FLOOR<br/>P.O. BOX 32159<br/>NEWARK NJ 07102<br/>973-854-1720<br/>JLOCICERO@ACLU-NJ.ORG; courtfiling@aclu-<br/>nj.org</b> | <b>09/27/2023</b> |
|-------------------------|---|-------------------|

|                          |   |                   |
|--------------------------|---|-------------------|
| <b>ANTHONY A. CAPUTO</b> | <b>SUSAN K O'CONNOR, Esq.<br/>HOAGLAND LONGO MORAN DUNST &amp;<br/>DOUKAS<br/>40 PATERSON ST<br/>PO BOX 480<br/>NEW BRUNSWICK NJ 08901<br/>732-545-4717<br/>SOCONNOR@HOAGLANDLONGO.COM;<br/>THESS@HOAGLANDLONGO.COM;<br/>PWAY@HOAGLANDLONGO.COM</b> | <b>09/27/2023</b> |
|--------------------------|---|-------------------|

|                                  |  |                   |
|----------------------------------|--|-------------------|
| <b>CITY OF NEW<br/>BRUNSWICK</b> | <b>SUSAN K O'CONNOR, Esq.<br/>HOAGLAND LONGO MORAN DUNST &amp;<br/>DOUKAS<br/>40 PATERSON ST<br/>PO BOX 480<br/>NEW BRUNSWICK NJ 08901<br/>732-545-4717<br/>SOCONNOR@HOAGLANDLONGO.COM;<br/>THESS@HOAGLANDLONGO.COM;</b> | <b>09/27/2023</b> |
|----------------------------------|--|-------------------|

(\*) truncated due to space limit. Please find full information in the additional pages of the form.

|  |  |                   |
|--|--|-------------------|
|  | <b>PWAY@HOAGLANDLONGO.COM</b>  |                   |
| <b>ASSOCIATION OF CHIEFS OF POLICE</b>                 | <b>VITO ANTHONY GAGLIARDI JR, Esq.<br/>PORZIO BROMBERG &amp; NEWMAN PC<br/>100 SOUTHGATE PKWY<br/>PO BOX 1997<br/>MORRISTOWN NJ 07962-1997<br/>973-538-4006<br/>VAGAGLIARDI@PBNLAW.COM;<br/>JACIABURRI@PBNLAW.COM;<br/>RJSISCO@PBNLAW.COM</b>                  | <b>09/27/2023</b> |
| <b>ASSOCIATION OF CHIEFS OF POLICE</b>                 | <b>DAVID LAWRENCE DISLER, Esq.<br/>PORZIO BROMBERG &amp; NEWMAN PC<br/>100 SOUTHGATE PKWY<br/>PO BOX 1997<br/>MORRISTOWN NJ 07962-1997<br/>973-538-4006<br/>DLDISLER@PBNLAW.COM;<br/>JACIABURRI@PBNLAW.COM;<br/>RJSISCO@PBNLAW.COM</b>                         | <b>09/27/2023</b> |
| <b>NJ STATE LODGE OF THE FRATERNAL ORDER OF POLICE</b> | <b>MATTHEW D AREMAN, Esq.<br/>MARKOWITZ &amp; RICHMAN<br/>123 SOUTH BROAD STREET<br/>SUITE 2020<br/>PHILADELPHIA PA 19109<br/>215-875-3100<br/>MAREMAN@MARKOWITZANDRICHMAN.COM;<br/>CPASQUARELLO@MARKOWITZANDRICHMAN.COM</b>                                   | <b>09/27/2023</b> |
| <b>NJ STATE LODGE OF THE FRATERNAL ORDER OF POLICE</b> | <b>RICHARD JOSEPH DE FORTUNA, Esq.<br/>MARKOWITZ &amp; RICHMAN<br/>123 SOUTH BROAD STREET<br/>SUITE 2020<br/>PHILADELPHIA PA 19109<br/>215-875-3100<br/>RDEFORTUNA@MARKOWITZANDRICHMAN.COM;<br/>RDEFORTUNA@GMAIL.COM;<br/>KBROOKES@MARKOWITZANDRICHMAN.COM</b> | <b>09/27/2023</b> |
| <b>NJ STATE POLICEMEN'S BENEVOLENT ASSOCIATION</b>     | <b>SHEILA MURUGAN, Esq.<br/>ZAZALI FAGELLA NOWAK, ET AL<br/>570 BROAD ST STE 1402<br/>NEWARK NJ 07102<br/>973-623-1822</b>   | <b>09/27/2023</b> |

(\*) truncated due to space limit. Please find full information in the additional pages of the form.

Revised effective: 09/01/2008, CN 10502 (Notice of Appeal)

**SMURUGAN@ZAZZALI-LAW.COM;  
SLOVELAND@ZAZZALI-LAW.COM**

**NJ STATE POLICEMEN'S  
BENEVOLENT  
ASSOCIATION**

**PAUL LEWIS KLEINBAUM, Esq.  
ZAZZALI FAGELLA NOWAK, ET AL  
570 BROAD ST STE 1402  
NEWARK NJ 07102  
973-623-1822  
PKLEINBAUM@ZAZZALI-LAW.COM;  
SLOVELAND@ZAZZALI-LAW.COM**

**09/27/2023**

**COUNTY PROSECUTORS  
ASSOCIATION OF NEW  
JERSEY**

**JOSEPH B PARAVECCHIA, Esq.  
HUNTERDON COUNTY PROSECUTORS OFFICE  
65 PARK AVENUE  
P0 BOX 756  
FLEMINGTON NJ 08822-0756  
908-788-1129  
JPARAVECCHIA@CO.HUNTERDON.NJ.US;  
JOSEPH.PARAVECCHIA@GMAIL.COM**

**09/27/2023**

**STATE TROOPERS  
FRATERNAL  
ASSOCIATION**

**ROBERT RUDDEN CANNAN, Esq.  
MARKMAN & CANNAN, LLC  
391 FRANKLIN ST  
BLOOMFIELD NJ 07003  
973-748-2100  
RCANNAN@MARKMANCANNANLAW.COM**

**09/27/2023**

Attached transcript request form has been served where applicable on the following:

|                                | Name | Date of Service |
|--------------------------------|------|-----------------|
| Transcript Office              |      |                 |
| Court Reporter (if applicable) |      |                 |
| Supervisor of Court Reporters  |      |                 |
| Clerk of the Tax Court         |      |                 |
| State Agency                   |      |                 |

Exempt from submitting the transcript request form due to the following:

- The appellant previously ordered the transcript. (A copy of the transcript request form must be uploaded)
- Transcript in possession of attorney or pro se litigant (four copies of the transcript must be submitted along with an electronic copy).

List the date(s) of the trial or hearing:

- Motion for abbreviation of transcript filed with the court or agency below. Attach copy.
- Motion for transcripts at public expense filed with the court below. Attach copy.

(\*) truncated due to space limit. Please find full information in the additional pages of the form.

I certify that the foregoing statements are true to the best of my knowledge, information and belief. I also certify that, unless exempt, the filing fee required by *N.J.S.A. 22A:2* has been paid.

**09/27/2023**

Date

**s/ ALEXANDER R SHALOM, Esq.**

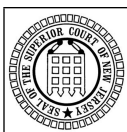
Signature of Attorney or Pro Se Litigant

BAR ID #

**021162004**

EMAIL ADDRESS

**ASHALOM@ACLU-NJ.ORG;  
COURTFILING@ACLU-NJ.ORG**



New Jersey Judiciary  
Superior Court - Appellate Division  
Amended Notice of Appeal

Additional appellants continued below

**Appellant's Attorney** Email Address: **JLOCICERO@ACLU-NJ.ORG; courtfiling@aclu-nj.org**

Plaintiff  Defendant  Other (Specify)

Name

**JEANNE M LOCICERO, Esq.**

Client

**CHARLES KRATOVIL**

Street Address

**570 BROAD ST, 11TH FLOOR P.O. BOX 32159**

City

**NEWARK**

State

**NJ**

Zip

**07102**

Telephone Number

**973-854-1720**

Additional respondents continued below

**Respondent's Attorney** Email Address: **SOCONNOR@HOAGLANDLONGO.COM; THESS@HOAGLANDLONGO.COM; PWAY@HOAGLANDLONGO.COM**

Plaintiff  Defendant  Other (Specify)

Name

**SUSAN K O'CONNOR, Esq.**

Client

**CITY OF NEW BRUNSWICK**

Street Address

**40 PATERSON ST PO BOX 480**

City

**NEW  
BRUNSWICK**

State

**NJ**

Zip

**08901**

Telephone Number

**732-545-4717**

Additional parties continued below

**Amicus Attorney** Email Address: **VAGAGLIARDI@PBNLAW.COM; JACIABURRI@PBNLAW.COM; RJSISCO@PBNLAW.COM**

Plaintiff  Defendant  Other (Specify)

Name

**VITO ANTHONY GAGLIARDI JR, Esq.**

Client

**ASSOCIATION OF CHIEFS OF POLICE**

Street Address

**100 SOUTHGATE PKWY PO BOX 1997**

City

**MORRISTOWN**

State

**NJ**

Zip

**07962-1997**

Telephone Number

**973-538-4006**

**Amicus Attorney** Email Address: **DLDISLER@PBNLAW.COM; JACIABURRI@PBNLAW.COM; RJSISCO@PBNLAW.COM**

Plaintiff  Defendant  Other (Specify)

Name

**DAVID LAWRENCE DISLER, Esq.**

Client

**ASSOCIATION OF CHIEFS OF POLICE**

Street Address

**100 SOUTHGATE PKWY PO BOX 1997**

City

**MORRISTOWN**

State

**NJ**

Zip

**07962-1997**

Telephone Number

**973-538-4006**

**Amicus Attorney** Email Address: **MAREMAN@MARKOWITZANDRICHMAN.COM; CPASQUARELLO@MARKOWITZANDRICHMAN.COM**

Plaintiff  Defendant  Other (Specify)

Name

**MATTHEW D AREMAN, Esq.**

Client

**NJ STATE LODGE OF THE FRATERNAL  
ORDER OF POLICE**

Street Address

**123 SOUTH BROAD STREET SUITE 2020**

City

**PHILADELPHIA**

State

**PA**

Zip

**19109**

Telephone Number

**215-875-3100**

**Amicus Attorney** Email Address: **RDEFORTUNA@MARKOWITZANDRICHMAN.COM; RDEFORTUNA@GMAIL.COM; KBROOKES@MARKOWITZANDRICHMAN.COM**

Plaintiff  Defendant  Other (Specify)

Name

**RICHARD JOSEPH DE FORTUNA, Esq.**

Client

**NJ STATE LODGE OF THE FRATERNAL**

**ORDER OF POLICE**

| Street Address                    | City         | State | Zip   | Telephone Number |
|-----------------------------------|--------------|-------|-------|------------------|
| 123 SOUTH BROAD STREET SUITE 2020 | PHILADELPHIA | PA    | 19109 | 215-875-3100     |

**Amicus Attorney** SMURUGAN@ZAZZALI-LAW.COM; SLOVELAND@ZAZZALI-LAW.COM  
 Email Address: LAW.COM

Plaintiff  Defendant  Other (Specify)

Name

SHEILA MURUGAN, Esq.

Client

NJ STATE POLICEMEN'S BENEVOLENT ASSOCIATION

| Street Address        | City   | State | Zip   | Telephone Number |
|-----------------------|--------|-------|-------|------------------|
| 570 BROAD ST STE 1402 | NEWARK | NJ    | 07102 | 973-623-1822     |

**Amicus Attorney** PKLEINBAUM@ZAZZALI-LAW.COM;  
 Email Address: SLOVELAND@ZAZZALI-LAW.COM

Plaintiff  Defendant  Other (Specify)

Name

PAUL LEWIS KLEINBAUM, Esq.

Client

NJ STATE POLICEMEN'S BENEVOLENT ASSOCIATION

| Street Address        | City   | State | Zip   | Telephone Number |
|-----------------------|--------|-------|-------|------------------|
| 570 BROAD ST STE 1402 | NEWARK | NJ    | 07102 | 973-623-1822     |

**Amicus Attorney** JPARAVECCHIA@CO.HUNTERDON.NJ.US;  
 Email Address: JOSEPH.PARAVECCHIA@GMAIL.COM

Plaintiff  Defendant  Other (Specify)

Name

JOSEPH B PARAVECCHIA, Esq.

Client

COUNTY PROSECUTORS ASSOCIATION OF NEW JERSEY

| Street Address            | City       | State | Zip        | Telephone Number |
|---------------------------|------------|-------|------------|------------------|
| 65 PARK AVENUE P0 BOX 756 | FLEMINGTON | NJ    | 08822-0756 | 908-788-1129     |

**Amicus Attorney** RCANNAN@MARKMANCANNANLAW.COM

Plaintiff  Defendant  Other (Specify)

Name

ROBERT RUDDEN CANNAN, Esq.

Client

STATE TROOPERS FRATERNAL ASSOCIATION

| Street Address  | City       | State | Zip   | Telephone Number |
|-----------------|------------|-------|-------|------------------|
| 391 FRANKLIN ST | BLOOMFIELD | NJ    | 07003 | 973-748-2100     |

Appellant's attorney email address continued below

**PARTY NAME: CHARLES KRATOVL ATTORNEY NAME: JEANNE M LOCICERO, Esq.**  
 JLOCICERO@ACLU-NJ.ORG  
 courtfiling@aclu-nj.org

Respondent's attorney email address continued below

**PARTY NAME: ANTHONY A. CAPUTO ATTORNEY NAME: SUSAN K O'CONNOR, Esq.**  
 SOCONNOR@HOAGLANDLONGO.COM  
 TCESS@HOAGLANDLONGO.COM  
 PWAY@HOAGLANDLONGO.COM  
**PARTY NAME: CITY OF NEW BRUNSWICK ATTORNEY NAME: SUSAN K O'CONNOR, Esq.**  
 SOCONNOR@HOAGLANDLONGO.COM  
 TCESS@HOAGLANDLONGO.COM  
 PWAY@HOAGLANDLONGO.COM

Additional Party's attorney email address continued below

**PARTY NAME: ASSOCIATION OF CHIEFS OF POLICE ATTORNEY NAME: VITO ANTHONY GAGLIARDI JR, Esq.**  
 VAGAGLIARDI@PBNLAW.COM

JACIABURRI@PBNLAW.COM  
RJSISCO@PBNLAW.COM  
PARTY NAME: ASSOCIATION OF CHIEFS OF POLICE ATTORNEY NAME: DAVID LAWRENCE DISLER,  
Esq.  
DLDISLER@PBNLAW.COM  
JACIABURRI@PBNLAW.COM  
RJSISCO@PBNLAW.COM  
PARTY NAME: NJ STATE LODGE OF THE FRATERNAL ORDER OF POLICE ATTORNEY NAME:  
MATTHEW D AREMAN, Esq.  
MAREMAN@MARKOWITZANDRICHMAN.COM  
CPASQUARELLO@MARKOWITZANDRICHMAN.COM  
PARTY NAME: NJ STATE LODGE OF THE FRATERNAL ORDER OF POLICE ATTORNEY NAME:  
RICHARD JOSEPH DE FORTUNA, Esq.  
RDEFORTUNA@MARKOWITZANDRICHMAN.COM  
RDEFORTUNA@GMAIL.COM  
KBROOKES@MARKOWITZANDRICHMAN.COM  
PARTY NAME: NJ STATE POLICEMEN'S BENEVOLENT ASSOCIATION ATTORNEY NAME: SHEILA  
MURUGAN, Esq.  
SMURUGAN@ZAZZALI-LAW.COM  
SLOVELAND@ZAZZALI-LAW.COM  
PARTY NAME: NJ STATE POLICEMEN'S BENEVOLENT ASSOCIATION ATTORNEY NAME: PAUL  
LEWIS KLEINBAUM, Esq.  
PKLEINBAUM@ZAZZALI-LAW.COM  
SLOVELAND@ZAZZALI-LAW.COM  
PARTY NAME: COUNTY PROSECUTORS ASSOCIATION OF NEW JERSEY ATTORNEY NAME:  
JOSEPH B PARAVECCHIA, Esq.  
JPARAVECCHIA@CO.HUNTERDON.NJ.US  
JOSEPH.PARAVECCHIA@GMAIL.COM  
PARTY NAME: STATE TROOPERS FRATERNAL ASSOCIATION ATTORNEY NAME: ROBERT RUDDEN  
CANNAN, Esq.  
RCANNAN@MARKMANCANNANLAW.COM



ALEXANDER R SHALOM, Esq.  
AMERICAN CIVIL LIBERTIES UNION OF NEW  
JERSEY FOUNDATION  
570 BROAD ST, 11TH FLOOR  
P.O. BOX 32159  
NEWARK, NJ 07102  
973-854-1720  
ASHALOM@ACLU-NJ.ORG  
COURTFILING@ACLU-NJ.ORG

Before Appellate Division,  
Superior Court of New Jersey  
DOCKET NO. **A-000216-23**

CIVIL

**CHARLES KRATOVIL**

**V.**

**CITY OF NEW BRUNSWICK AND ANTHONY CAPUTO**

PROOF OF SERVICE

I hereby certify that an original of the following documents, **PROOF OF SERVICE, AMENDED NOTICE OF APPEAL** were submitted and transmitted to the parties listed below in the following format:

ELECTRONICALLY TO:

ATTORNEY NAME: JEANNE M LOCICERO, Esq.

JLOCICERO@ACLU-NJ.ORG; courtfiling@aclu-nj.org

ATTORNEY NAME: SUSAN K O'CONNOR, Esq.

SOCONNOR@HOAGLANDLONGO.COM; THESS@HOAGLANDLONGO.COM;  
PWAY@HOAGLANDLONGO.COM

ATTORNEY NAME: SUSAN K O'CONNOR, Esq.

SOCONNOR@HOAGLANDLONGO.COM; THESS@HOAGLANDLONGO.COM;  
PWAY@HOAGLANDLONGO.COM

ATTORNEY NAME: VITO ANTHONY GAGLIARDI JR, Esq.

VAGAGLIARDI@PBNLAW.COM; JACIABURRI@PBNLAW.COM;  
RJSISCO@PBNLAW.COM

ATTORNEY NAME: DAVID LAWRENCE DISLER, Esq.

DLDISLER@PBNLAW.COM; JACIABURRI@PBNLAW.COM; RJSISCO@PBNLAW.COM

ATTORNEY NAME: MATTHEW D AREMAN, Esq.

MAREMAN@MARKOWITZANDRICHMAN.COM;  
CPASQUARELLO@MARKOWITZANDRICHMAN.COM

ATTORNEY NAME: RICHARD JOSEPH DE FORTUNA, Esq.

RDEFORTUNA@MARKOWITZANDRICHMAN.COM; RDEFORTUNA@GMAIL.COM;  
KBROOKES@MARKOWITZANDRICHMAN.COM

ATTORNEY NAME: SHEILA MURUGAN, Esq.

SMURUGAN@ZAZZALI-LAW.COM; SLOVELAND@ZAZZALI-LAW.COM

ATTORNEY NAME: PAUL LEWIS KLEINBAUM, Esq.

PKLEINBAUM@ZAZZALI-LAW.COM; SLOVELAND@ZAZZALI-LAW.COM

ATTORNEY NAME: JOSEPH B PARAVECCHIA, Esq.

JPARAVECCHIA@CO.HUNTERDON.NJ.US; JOSEPH.PARAVECCHIA@GMAIL.COM

ATTORNEY NAME: ROBERT RUDDEN CANNAN, Esq.

RCANNAN@MARKMANCANNANLAW.COM

TRIAL COURT JUDGE: JOSEPH L. REA, JSC

TRIAL COURT DIVISION MANAGER: IAN RATZLAFF

BY MAIL:

I certify that the forgoing 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.

**Attorney for APPELLANT  
CHARLES KRATOVIL**

Dated: **09/27/2023**

By: **S/ ALEXANDER R SHALOM, Esq.**