



JI-NJ-0001-0002

ORIGINAL FILED

OCT 26 1978

CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL ON FILE IN MY OFFICE THIS NOTICE IS GIVEN IN COMPLIANCE WITH THE RULES OF COURT.

Richard J. Dentrick
Clerk

TERENCE P. CORCORAN
DEPUTY PUBLIC DEFENDER
100 HAMILTON PLAZA
PATERSON, NEW JERSEY 07505
(201) 279-9800

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - PASSAIC COUNTY

THE STATE OF NEW JERSEY
(Department of the Public Advocate,
Office of the Public Defender) :

8669 78

CIVIL ACTION

IN THE INTEREST OF P.H. et al, :

VERIFIED COMPLAINT

vs. :

PASSAIC COUNTY BOARD OF FREEHOLDERS, :
AND MARTIN BARNES, DIRECTOR OF THE :
PASSAIC COUNTY YOUTH CENTER. :

The Office of the Public Defender, Passaic Region, by way of
complaint does say:

1. I am the First Assistant Deputy Public Defender of Passaic County.
2. I am familiar with the overcrowded situation at the Passaic County Youth Center, Wayne, New Jersey.
3. The Office of the Public Defender represents 36 of the juveniles housed at the Youth Center at the time of typing of this complaint.
4. We represent these 36 juveniles housed at the Youth Center due to the fact that they are being confined on complaints filed through the Passaic County Prosecutor's Office.
5. It has come to my attention that the Passaic County Youth Center Wayne, New Jersey, is housing juveniles in numbers far in excess of its capacity.

State of N.J. (Dept. of the Public Advocate, Office of
the Public Defender) vs. Passaic County Bd. of Freeholders,
and Martin Barnes, Director of the Youth Center

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6. The Board of Freeholders and Director Martin Barnes are responsible for properly maintaining the Youth Center.

7. Based on information and belief, there are many physical and program violations which exist at the present facility in violation of Department of Correction regulations therefore, the present facility is inadequate and physically dangerous.

8. Due to the failure of Passaic County to adequately provide facilities for these juveniles, we request that the Court review the circumstances surrounding this overcrowding situation.

Wherefore, the Office of the Public Defender, Passaic Region, requests an Order that releases those juveniles, in the discretion of the Court, in sufficient numbers to satisfy the overcrowding, or take appropriate action to make necessary housing facilities as required and determined by the Court in accordance with Department of Corrections and other regulations.

The Office of the Public Defender would also request a definitive Order specifying what action should be taken by the Freeholders to correct the inadequate Youth Center problem and set a definite timetable for implementation of any solution determined by the Court after the taking of testimony.



WILLIAM J. BIZUB, First Assistant
Deputy Public Defender

Date: October 24, 1978

VERIFICATION OF PLEADING

STATE OF NEW JERSEY)
) SS.
COUNTY OF PASSAIC)

WILLIAM J. BIZUB, ESQ., of full age, being duly sworn according to law, on his oath says:

1. I work at the Office of the Public Defender, Passaic Region, 100 Hamilton Plaza, Paterson, New Jersey and I am the plaintiff in the above entitled action.

2. I have read the annexed complaint and know the contents thereof and the same are true of my own knowledge, except as to matters therein stated to be alleged on information and belief, and, as to those matters, I believe them to be true.



WILLIAM J. BIZUB, ESQ.

Sworn and subscribed to before me this 20th day of October, 1978.

Date: October 24, 1978



Elijah L. Miller Jr., Esq.
ATTORNEY-AT-LAW, STATE OF N.J.