

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW JERSEY  
NEWARK, NEW JERSEY 17101

TERRY TRAYLOR, GERALDO MORALES,  
VINCENT R. SANFORD, THOMAS  
FLANAGAN, RALPH WALDRON,  
DAVID CARSON, and all others Similarly  
situated

Plaintiffs

Vs.

GARY LANIGAN; ELIZABETH  
CONNOLLY; SHERRY YATES;  
JAMES SLAUGHTER; MERRILL MAIN;  
HEATHER BURNETT; AND  
TREATMENT TEAM ONE,  
TREATMENT TEAM TWO,  
TREATMENT TEAM THREE,  
TREATMENT TEAM FOUR,  
TREATMENT TEAM FIVE,  
TREATMENT TEAM SIX,  
TREATMENT TEAM SEVEN,  
TREATMENT TEAM EIGHT,  
TREATMENT TEAM NINE,  
Et. al.,  
Defendants.

CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

Case #: 2016 OCT 21 P 2-58

Pursuant to 42 U.S.C. § 1983  
28 U.S.C. § 1367 (b)  
N.J.S.A. 30: 4 - 27.24 et seq.

1a. Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 et seq.  
Class certification is sought because this question pertains  
to all civil confinees under N.J.S.A. 30: 4-27-24 et seq.  
(NJSAPA). All parties are residents of the Court's  
jurisdiction.

1b. Indicate whether you are a prisoner or other confined  
person: **Civilly confined detainees.**

2. Previously dismissed federal civil actions or appeals:

- a. Edward Salerno, et al v. Jon Corzine, et al
- b. Case Number: 15-3311, District Case Number: 2-06-cv-03547
- c. N/A The Issue was never addressed.
- d. Approximate date of filing lawsuit: June 13, 2007
- e. Approximate date of disposition: May 27, 2016

3. Place of present confinement: Special Treatment Unit, 8 Production Way, Avenel, N.J. 07001, pursuant to N.J.S.A. 30:4-27.24 et seq.

4a. Parties: Terry Traylor, Geraldo Morales, Vincent R. Sanford, Thomas Flanagan, Ralph Waldron, and David Carson. All presently reside at 8 Production Way, Avenel, NJ 07001

4b1. First Defendant Gary Lanigan  
Commissioner of the Department of  
Corrections for N.J.  
Cubberly Building, Whittlesey Road  
Trenton, NJ 08625

How is this person involved in the case?

Defendant Gary Lanigan is the Commissioner of the Department of Corrections for the State of New Jersey, and by statute, has the authority to set, revise, abandon or nullify, amongst other things, the rules and regulations promulgated by N.J.D.O.C. as they apply to inmates. The relevant statute reads in part: "Protects the public and provides for the custody, care, discipline, and training of persons persons committed to correctional facilities or parole"; prepares prisoners for release and reintegration into society" N.J.S.A. 30:1B-1 Defendant Gary Lanigan is sued herein in his personal, professional and official capacity. At all relevant times, he was acting under the color of state law.

4b2. Second defendant: Elizabeth Connolly  
Commissioner of the Dept. of Human  
Services  
222 S. Warren Street  
Trenton, NJ 08625

How is this person involved in the case?

Defendant Elizabeth Connolly is the acting Commissioner of the Department of Human Services for the state of New Jersey, and oversees the entities of D.H.S., which includes the Special Treatment Unit located in Avenel, NJ. The relevant statute reads in part: "Administers and establishes policy for governing the state's charitable, medical and relief institutions, noninstitutional facilities and program services." N.J.S.A. 30:1-2.3. Defendant Elizabeth Connolly is sued herein in her personal, professional and official capacity. At all relevant times, she was acting under the color of state law.

4b3. Third defendant: Sherry Yates  
Administrator, A.D.T.C.  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Sherry Yates, through her subordinates, under her direct supervision and control, is responsible for the overall operations of the Adult Diagnostic & Treatment Center and the Special Treatment Unit, both located at the complex at 8 Production Way, Avenel, NJ 07001. Defendant Sherry Yates is sued herein in her personal, professional and official capacity. At all relevant times, she was acting under the color of state law.

4b4. Fourth defendant: James Slaughter  
Asst. Administrator, A.D.T.C.  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant James Slaughter is the assistant superintendent, who under his direct supervision and control, who oversees the day-to-day operations of the Special Treatment Unit for Ms. Yates and the N.J. Dept. of Corrections. Defendant James Slaughter is sued herein in his personal, professional and official capacity. At all relevant times, he was acting under the color of state law.

4b5. Fifth defendant: Merrill Main, PhD.  
Clinical Director  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant is the Merrill Main, PhD. is the Clinical Director of the Special Treatment Unit and responsible for implementing and pursuing the policies put forth by the Department of Human Services in a therapeutic environment, and seeing to the mental health and special needs of the residents of the facility. Defendant Merrill Main, PhD. is sued herein in his personal, professional and official capacity. At all relevant times, he was acting under the color of state law. Defendant Merrill Main, is has tried to force me to participate and speak in treatment sessions in violation of my rights, mainly the first Amendment and penalized me for not forfeiting my rights and caused me to suffer for exercising my rights, by denying me a job, and by not providing the basic necessities such as soap, toothpaste, deodorant, shampoo, etc.

4b6. Sixth defendant: Heather Burnett  
Social Services Supervisor  
Dept. of Human Services  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Heather Burnett is the social worker supervisor who oversees the day-to-day job responsibilities of those hired to

help residents in their therapeutic goals and needs at the Special Treatment Unit. Defendant Heather Burnett is sued herein in her personal, professional and official capacity. At all relevant times, she was acting under the color of state law.

4b7. Seventh defendant: Treatment Team One  
Dept. of Human Services  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Treatment Team One is made up of John and Jane Does 1-15, these being fictitious designations to be changed during the discovery process, who decide whether or not a resident is progressing satisfactorily in his therapy, and furnishes progress reports to the court for its consideration. Also makes recommendations for release.

4b8. Eighth defendant: Treatment Team Two  
Dept. of Human Services  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Treatment Team Two is made up of John and Jane Does 1-15, these being fictitious designations to be changed during the discovery process, who decide whether or not a resident is progressing satisfactorily in his therapy, and furnishes progress reports to the court for its consideration. Also makes recommendations for release.

4b9. Ninth defendant: Treatment Team Three  
Dept. of Human Services  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Treatment Team Three is made up of John and Jane Does 1-15, these being fictitious designations to be changed during the discovery process, who decide whether or not a resident is progressing satisfactorily in his therapy, and furnishes progress reports to the court for its consideration. Also makes recommendations for release.

4b10. Tenth defendant: Treatment Team four  
Dept. of Human Services  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Treatment Team Four is made up of John and Jane Does 1-15, these being fictitious designations to be changed during the discovery process, who decide whether or not a resident is progressing satisfactorily in his therapy, and furnishes progress reports to the court for its consideration. Also makes recommendations for release.

4b11. Eleventh defendant: Treatment Team five  
Dept. of Human Services  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Treatment Team Five is made up of John and Jane Does 1-15, these being fictitious designations to be changed during the discovery process, who decide whether or not a resident is progressing satisfactorily in his therapy, and furnishes progress reports to the court for its consideration. Also makes recommendations for release.

4b12. Twelfth defendant: Treatment Team Six  
Dept. of Human Services  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Treatment Team Six is made up of John and Jane Does 1-15, these being fictitious designations to be changed during the discovery process, who decide whether or not a resident is progressing satisfactorily in his therapy, and furnishes progress reports to the court for its consideration. Also makes recommendations for release.

4b13. Thirteenth defendant: Treatment Team Seven  
Dept. of Human Services  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Treatment Team Seven is made up of John and Jane Does 1-15, these being fictitious designations to be changed during the discovery process, who decide whether or not a resident is progressing satisfactorily in his therapy, and furnishes progress reports to the court for its consideration. Also makes recommendations for release.

4b14. Fourteenth defendant: Treatment Team Eight  
Dept. of Human Services  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Treatment Team Eight is made up of John and Jane Does 1-15, these being fictitious designations to be changed during the discovery process, who decide whether or not a resident is progressing satisfactorily in his therapy, and furnishes progress reports to the court for its consideration. Also makes recommendations for release.

4b15. Fifteenth defendant: Treatment Team Nine  
Dept. of Human Services  
Special Treatment Unit  
8 Production Way,  
Avenel, NJ 07001

How is this person involved in the case?

Defendant Treatment Team Nine is made up of John and Jane Does 1-15, these being fictitious designations to be changed during the discovery process, who decide whether or not a resident is progressing satisfactorily in his therapy, and furnishes progress reports to the court for its consideration. Also makes recommendations for release.

5. YES

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

We previously have sought informal or formal relief from the appropriate officials regarding the acts complained of in the Statement of Claims.

We have attempted to resolve these issues through remedy forms, court filings, and appeals to both commissioners (DOC/DHS), and have been unable to convince them to remedy the situations that are now fully explained in our statement of claims.

6. STATEMENT OF CLAIMS:

The Defendants, both singularly and in cooperation with each other, in both their personal, professional and official capacities, have violated Plaintiffs, First Amendment rights as implicated by the United States Constitution [see Youngberg v. Romeo, 457 US 302, 1982:

A. This complaint asserts a civil rights action pursuant to Title 42 of the United States Code, § 1983 for Declaratory and Injunctive relief to redress violation of the United States

Constitution in connection with the complete and utter failure of the Defendant's or those acting under their control or direction to provide adequate and meaningful mental health treatment to the named Plaintiff's and all other's similarly situated that have been involuntarily detained by the New Jersey Department of Human Services (DHS) pursuant to the New Jersey Sexually Violent Predator Act N.J.S.A. 30:4-27.28 et. al. (the "SVPA"). The avowed purposed of the (SVPA) is to provide mental health treatment and care to individuals in the custody of (DHS) in the least restrictive manner consistent with the person's need and in accordance with the court's commitment order. The treatment and care provided by the Defendant's to the Plaintiff's and all others similarly situated is punitive and Constitutionally inadequate.

#### **JURISDICTION**

B. The Court has jurisdiction over this action under Title 28 of the United States Code, §1331 and 1343.

#### **PARTIES**

C. Plaintiff Terry Traylor was involuntarily civilly committed pursuant to the (SVPA) on or about May 31, 2002 by the Superior Court of Essex County, Newark, NJ. Terry Traylor has not consented to participate in any mental health treatment program provided by (DHS). Terry Traylor is appealing his commitment order and has refused treatment or to participate in any test administered by the Defendants. Nevertheless, due to the systemic deficiencies in the (SVP) program described below. Resident Terry Traylor has never received adequate counseling or treatment that might yield a realistic chance for his release.

#### **BACKGROUND**

D. The (SVPA) provides for the civil commitment in to the custody of (DHS) of persons that: (a) have been convicted or acquitted by reason of insanity, of certain sexual offenses; and (b) have been found to have a mental disorder that creates a substantial possibility that they will engage in future acts of

sexual violence. Persons may be detained by (DHS) pursuant to the (SVPA) prior to a civil commitment proceeding if there is probable cause to believe that conditions (a) and (b) above are met.

E. Although the (SVPA) purpose is not to punish, but instead is to provide for the segregation and treatment of persons with a dangerous mental disorder. Plaintiffs in fact have not received adequate treatment and have been confined in punitive conditions that are not rationally related to the purposes of the (SVPA).

F. This action challenges under the Due Process Clause of the First, and Fourteenth Amendment the punitive conditions and the inadequate treatment received by the plaintiff's and all others similarly situated. Specifically, this action challenges the decision of the Defendants to "Warehouse" and put out of sight the Plaintiff's and all others similarly situated in attempt to hold them indefinitely and to punish, rather than treat their perceived mental disabilities. It is an Equal Protection Violation.

#### **CLASS ALLEGATIONS**

G. This case is brought on behalf of a class that consist of all persons who have been, are or will be committed under the (SVPA) and placed in the custody of (DHS).

H. The class is so numerous that joinder of all members is impracticable. The population in the custody of (DHS) exceeds 450 individuals and is constantly growing larger as new persons are detained and civilly committed under the (SVPA).

I. There are questions of law and fact common to the members of the class, and this question predominate over those affecting only individual class members. The predominate common question is whether the mental health treatment and care provided by the defendants or those acting under their control or direction comports with the requirements of the Due Process Clause of the United States Constitution or falls under the equal Protection

Clause of the Federal Constitution?

I1. **Second** question of law: Do the Plaintiff's have a State and Federal Constitutional Right to refuse Treatment and not be punished for exercising that Right?

J. Plaintiff's claims are typical of the claims of the class members. All are based on the same factual and legal theories in that they have all suffered as a result of the unconstitutional policies and practices alleged in this complaint.

K. Plaintiff's will fairly and adequately represent the members of the class. They have no interests antagonistic to the class, and they are represent by counsel who are competent and experienced in civil rights litigation.

L. A class action is superior for the fair and efficient adjudication of this matter, in that the Defendant's , by creating and maintaining the practices alleged in this complaint, have acted on grounds generally applicable to the class, and as a result, declaratory and injunctive relief with respect to the entire class is appropriate.

#### **DUE PROCESS VIOLATIONS**

##### **Count 1**

M. Defendants, are sued herein in their personal, professional and official capacity. At all relevant times, they were acting under the color of state law. They are collectively responsible for the policies and procedures controlling the manner and method of Plaintiff's confinement and manner and method of their mental health treatment.

N. The Fourteenth Amendment Due Process Clause requires states to provide civilly committed persons with access to mental health treatment that is at least minimally adequate and gives them a realistic opportunity for their conditions to similarly situated

are not prisoners, they are entitled to more considerate treatment and conditions of confinement than criminals whose conditions of confinement are designed to punish.

O. The Plaintiff and all others similarly situated are being denied meaningful mental health care treatment that gives them realistic opportunity for their conditions materially to improve because, among other things, the Defendants have failed:

- (a) To properly train staff regarding the treatment of sexual deviance;
- (b) To provide a coherent and meaningful individualized treatment program for each detainee with unstandable goals and a road map showing steps necessary for improvement and release;
- (c) To make adequate provisions for the participation of detainees; family members in rehabilitation efforts, including permitting family visits with reasonable frequency and allowing prompt telephone access to detainees in case of family emergency;
- (d) To draft and implement fair and reasonable grievance procedures and behavior management plans;
- (e) To afford reasonable opportunities to all residents for Educational, Religious, Vocational, and recreational activities;
- (f) To cease requiring as a precondition to participation in all but the most basic treatment offered by (DHS), and therefor, as a predicate to release, that the Plaintiffs and others similarly situated detainees to admit to comprehensive listing of real and imagined of future criminal prosecution for the other crimes in violation of the Plaintiff's Fifth Amendment right against self incrimination applies to the States by the Fourteenth Amendment; and
- (g) To institute procedures to guarantee appropriate therapist/patient confidentiality.

P. The aforesaid failure to provide constitutionally adequate treatment is a substantial departure from accepted professional judgment, practice or standards and demonstrates that the Defendant's did not base their decisions on such professional

judgment.

Q. Instead of providing treatment and conditions that are rationally related to the purposes of Plaintiff's confinement. Defendant's are using the (SVPA) that was initiated over eighteen years ago, no more than a handful of detainees have been permitted to successfully complete the Defendant's treatment program to the point where the Defendant's recommended their discharge to the Courts. Defendant's erect one arbitrary barrier after another to prevent Plaintiff's from progressing to the point where the Treatment Team will recommended their release, including requiring participants in the program to confess to crimes they did not commit.

R. The Plaintiff and all others similarly situated are being held in conditions that are more restrictive than the conditions under which the Plaintiffs were confined when they were incarcerated as criminals prior to their civil commitment under the (SVPA). These conditions are unrelated to the security or treatment needs of the SVP population and are purely punitive in nature and continue to be reinforced as retaliatory measures. Further, the Plaintiffs and all others similarly situated are

. Whereas, for example: one resident, Terry Traylor was not diagnosed nor characterized of having a pattern of compulsive behavior and not amenable for sex offender treatment. Therefore, was sentenced to State Prison. After maxing out on his sentence, about 10 years. A day before his release Resident Terry Traylor was transferred to the Special Treatment Unit for Sex Offender Treatment. For the past 14 years.

Whereas, residents are transferred to the (STU) from other institutions other than the Adult Diagnostic & Treatment Center. Supposedly, the (STU) is for "The worst of the worst", But it has turned into a dumping ground for anyone whose sentence they want to extend. The diagnoses must be clear, and provable as "Clear and

convincing evidence". [See IMO R.F., March 2014 Supreme Court of New Jersey]

7. Relief Sought: the Plaintiffs and similarly situated residents ask the Court for the following:

A] To rule that the Plaintiffs have a Constitutional Right to refuse Treatment and not be punished for exercising that Right.

B] Order that Resident Terry Traylor and all others similarly situated are not to be denied employment, their property, and personal needs, etc., for affirming the right not to participate in any mental health treatment program. And by doing so like all others similarly situated are denied Jobs, loss of property, and being segregated in a Housing Unit and not allowed to participate with other Residents just for affirming a right not to participate.

C] A temporary restraining order/injunction to prevent retaliation by both DOC and DHS, in that DOC uses abrupt cell-to-cell moves as retaliation, and to intimidate, while DHS uses Treatment Probation/Treatment Refusal to punish and retaliate when their wishes are not followed, to the letter. In several instances, residents who are already civilly committed or simply temporarily detained affirm the right not to discuss the offense(s) they are charged with, even if they are on appeal in the criminal venue, or the resident's lawyer instructs them to remain silent regarding the issue. They are retaliated and intimidated against for not participating in any mental health treatment program.

D] That DOC Personnel be trained to act more professionally in a therapeutic environment, unless the Court, after a full hearing on the subject, believes that DOC should be severed from the SVPA.

E] Instruct DOC and DHS to develop an actual Patient's Bill of Rights through the Interagency Oversight Board We are not

inmate/prisoners and yet we have fewer rights than those being treated in other civilian facilities, such as Ann Klein, Trenton Forensic Hospital or Ancora State Hospital.

F] That DHS be ordered to develop specific policies regarding how those are not yet judicially committed for treatment and still in the appeal process are treated. Case law in New Jersey is clear that those cases under direct or collateral attack are not open to discussion due to the non-confidentiality of the therapy groups. Further, that DHS be enjoined from any practices that are designed to intimidate, threaten, bully, or coerce a resident into a discussion he has been instructed by counsel not to have.

G] That the Treatment Team be enjoined immediately by this Court from classifying any resident as a Treatment Refuser if that resident is under appeal or pursuing a collateral attack on his conviction, is not yet committed, and has been advised by the Court and/or counsel under George Bender vs. N.J.D.O.C., (2003) not to discuss any particulars of his case. The Treatment Team should not have the statutory authority reserved for the courts in order to override a court order. It is a deliberate act of retaliation.

H] That these requested restraining orders and the injunctive relief sought be considered by the Court within the initial seven (7) days of receipt.

8. Do you request a jury trial or non-jury trial?

[XXX] Jury [ ] Non-jury

Plaintiffs reserve the right to amend this complaint to bring it into compliance with the court's directions, should amending it be necessary.

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

Plaintiffs:

Terry Traylor 8/22/2016  
Terry Traylor DATE

Geraldo Morales 8/22/2016  
Geraldo Morales DATE

Vincent R. Sanford 8/22/2016  
Vincent R. Sanford DATE

Thomas Flanagan 8/22/2016  
Thomas Flanagan DATE

Ralph Waldron 8/22/2016  
Ralph Waldron DATE

David Carson 8/22/2016  
David Carson DATE

*Updated to October 17, 2016*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW JERSEY  
NEWARK, NEW JERSEY 07101**

TERRY TRAYLOR, et al.  
Plaintiffs

**APPLICATION TO PROCEED  
IN FORMA PAUPERIS**

Vs.

Civil No. \_\_\_\_\_

MERRILL MAIN, et al.  
Defendants

I, TERRY TRAYLOR, declare that I am the (check appropriate box).

☒ Petitioner / plaintiff / movant ☐ Other

in the above - entitled proceeding: that, is 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. The nature of my actions, defense, or other proceeding or the issues I intend to present on appeal are briefly stated as follows:

This "1983" involves not being provided a  
Personal Needs Allowance nor a Stipend or a  
Job to support our needs which amounts  
to warehousing and punitive for  
exercising our 1<sup>st</sup> Amendment Rights

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

1. Are you currently incarcerated? ☐ Yes ☒ No

If "Yes" list dates and places of confinement for the six-month period immediately preceding the filing of this application:

Dates of ConfinementJan. 29, 2002Place of ConfinementSpecial Treatment Unit

For each institution in which you have been confined for the preceding six months, you must submit a certified copy of your prison account statement and an Account Certification Form (use attached Account Certification Forms).

2. 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

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

a. Business, profession, or other self-employment? Yes ☒ No

b. Rent payments, interest, or dividends Yes ☒ No

c. Pensions, annuities, or life insurance payments Yes ☒ No

d. Disability or workers compensation payments Yes ☒ No

e. Gifts or inheritances Yes ☒ No

f. Any other sources Yes ☒ No

If the answer to any of the above is "Yes" describe each source of money and state the amount received and what you expect you will continue to receive.

N/A

4. Other than your prison account, do you have any cash or checking or saving account?

☒ Yes ☐ No

If "Yes" state the total amount: \$291.39 is what I live off of.

5. Do you own any real estate, stocks, bonds, securities, other financial instruments, automobiles, or any other property or assets?

Yes ☒ No

If "Yes" please describe: N/A

6. List the persons who are dependent on you for support, your relationship to each and how much you contribute to their support.

N/A

Authorization and Declaration

I, NI / A  
(Print or Type Name and Address of Prisoner)

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 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 \$150.00 fee is paid. 28 U.S.C. § 1915 (b) (1) and (2).

I declare under penalty of perjury that the information contained in this application is true and correct.

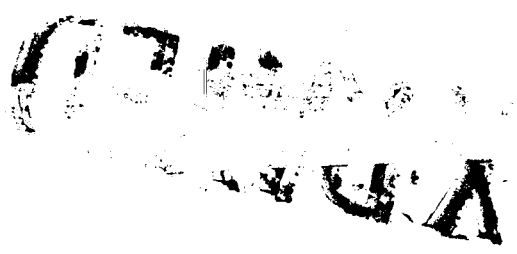
August 22, 2016  
DATE

Jerry Taylor  
"Without prejudice 1-207"  
SIGNATURE OF APPLICATION

*up dated to October 17, 2016*

*P.S. I am not a State Prisoner and this section does not apply. Though I am civilly committed I have no money in my account because this Lawsuit is about a Job or a Personal Needs Allowance or a Stipend.*

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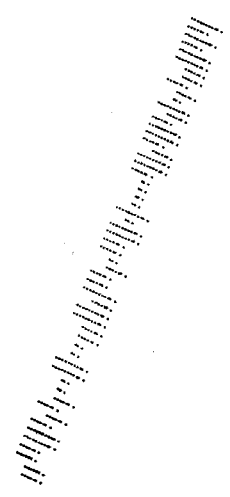


U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

2016 OCT 18

Mr. Terry Traylor #224  
Special Treatment Unit  
8 Production Way  
P.O. Box CN 905  
Avenel, New Jersey 07001

TO: Mr. William T. Walsh, Clerk  
United States District Court  
P.O. Box 419  
Newark, New Jersey 07101-0419



# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Special Treatment Unit Detainees File Civil Rights Class Action in NJ](#)

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