

COMPLAINT - SUMMONS

COMPLAINT NUMBER			
0307	S	2022	000028
COURT CODE	PREFIX	YEAR	SEQUENCE NO.
CHESTERFIELD TWP MUNICIPAL COURT 1 MUNICIPAL DRIVE BORDENTOWN NJ 08505-0000 609-298-2802 COUNTY OF: BURLINGTON			
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 2020-04459	
COMPLAINANT NAME: ROSS PORTNER 25 MARKET ST P O BOX 085 TRENTON NJ 08625	DEFENDANT INFORMATION SEX: M EYE COLOR: BROWN DOB: 1973 DRIVER'S LIC. #. DL STATE: NJ SOCIAL SECURITY #: xxx-xx- SBI #: () TELEPHONE #. LIVESCAN PCN #.		

THE STATE OF NEW JERSEY

VS.

RAYMOND J QUINONES

ADDRESS

BEACHWOOD

NJ 08722-3508

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about **04/08/2020** in **CHESTERFIELD TWP**, **BURLINGTON County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, WITHIN THE JURISDICTION OF THIS COURT, ON OR ABOUT APRIL 8, 2020, IN THE TOWNSHIP OF CHESTERFIELD, IN THE COUNTY OF BURLINGTON, DID KNOWINGLY MAKE, PRESENT, OFFER FOR FILING OR USE ANY RECORD, DOCUMENT OR THING KNOWING IT TO BE FALSE, AND WITH PURPOSE THAT IT BE TAKEN AS A GENUINE PART OF INFORMATION OR RECORDS BELONGING TO, OR RECEIVED OR KEPT BY, THE GOVERNMENT FOR INFORMATION OR RECORD, OR REQUIRED BY LAW TO BE KEPT BY OTHERS FOR INFORMATION OF THE GOVERNMENT, WITH THE PURPOSE TO DEFRAUD OR INJURE ANYONE, THAT IS, THE SAID RAYMOND QUINONES, WHILE EMPLOYED BY THE DEPARTMENT OF CORRECTIONS, KNOWINGLY MADE ONE OR MORE FALSE ENTRIES IN A SPECIAL CUSTODY REPORT, PREPARED BY QUINONES IN CONNECTION WITH HIS DUTIES AS A SENIOR CORRECTION POLICE OFFICER FOR THE DEPARTMENT OF CORRECTIONS AT THE GARDEN STATE YOUTH CORRECTIONAL FACILITY, IN VIOLATION OF N.J.S.A. 2C:28-7(A) (THIRD DEGREE). THIS CASE IS BEING PROSECUTED BY DAG ADAM GERKEN, OF THE OFFICE OF PUBLIC INTEGRITY AND ACCOUNTABILITY.

in violation of:

Original Charge	1) 2C:28-7A(1)	2)	3)
Amended Charge			

CERTIFICATION:

I certify that the foregoing 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.

Signed: ROSS PORTNER Date: 05/24/2022

The complaining witness is a law enforcement officer and a judicial probable cause determination is not required prior to the issuance of this Complaint-Summons.

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the Superior Court in the county of: BURLINGTON

at the following address: BURLINGTON COUNTY

CRIMINAL COURTS 49 RANCOCAS ROAD MT HOLLY NJ 08060-0000

If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.

Date of Arrest: **05/24/2022** Appearance Date: **06/30/2022** Time: **09:00AM** Phone: **609-288-9500**

Signature of Person Issuing Summons: ROSS PORTNER Date: 05/24/2022

Domestic Violence – Confidential

Related Traffic Tickets or Other Complaints

Serious Personal Injury/ Death Involved

Special conditions of release:

- No phone, mail or other personal contact w/victim
- No possession firearms/weapons
- Other (specify):

ORIGINAL

COMPLAINT – SUMMONS (Court Action)

COMPLAINT NUMBER

0307	S	2022	000028
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STATE V.

RAYMOND J QUINONES

FTA Bail Information		Date Bail Set: _____	Amount Bail Set: \$ _____ by: _____	<input type="checkbox"/> Bail Recog. Attached
Released on Bail	R.O.R.	Committed Default	Committed w/o Bail	Date Referred to County Prosecutor: _____
Place Committed: _____				Defendant Desires Counsel: <input type="checkbox"/> Yes <input type="checkbox"/> No
Date of First Appearance: 06/30/2022	<input type="checkbox"/> Advised of Rights by _____			

Prosecuting Attorney Information**Defense Counsel Information**

Name:				Name:					
State	County	Municipal	Other	None	Retained	Public Def	Assigned	Waived	Other

Original Charge	1) 2C:28-7A(1)		2)	3)		
Amended Charge						
Waiver Indt/Jury						
Plea/Date of Plea	Plea: _____ Date: _____	Plea: _____ Date: _____	Plea: _____ Date: _____	Plea: _____ Date: _____		
Adjudication (* see code)	Finding Code: _____ Date: _____	Finding Code: _____ Date: _____	Finding Code: _____ Date: _____	Finding Code: _____ Date: _____		
Jail Term	Jail time credit	Susp. Imp	Jail time credit	Susp. Imp	Jail time credit	Susp. Imp
Probation Term	Susp. Imp		Susp. Imp		Susp. Imp	
Cond. Discharge Term						
Community Service						
D/L Suspension Term						
Fines/Costs	Fines: _____ Costs: _____	Fines: _____ Costs: _____	Fines: _____ Costs: _____	Fines: _____ Costs: _____		
VCCB/SNSF	VCCB: _____ SNSF: _____	VCCB: _____ SNSF: _____	VCCB: _____ SNSF: _____	VCCB: _____ SNSF: _____		
DEDR/Lab Fee	DEDR: _____ LAB: _____	DEDR: _____ LAB: _____	DEDR: _____ LAB: _____	DEDR: _____ LAB: _____		
CD Fee/Drug Ed Fnd	CD: _____ DAEF: _____	CD: _____ DAEF: _____	CD: _____ DAEF: _____	CD: _____ DAEF: _____		
DV Surch/Other Fees	DV: _____ Other: _____	DV: _____ Other: _____	DV: _____ Other: _____	DV: _____ Other: _____		
Restitution Beneficiary: _____						

Miscellaneous Information, Adjournments, Companion Complaints, Co-Defendants, Case Notes:*** Finding Codes**

- 1 – Guilty
- 2 – Not Guilty
- 3 – Dismissed – Other
- 4 – Guilty but Merged
- 5 – Dismissed-Rule
- 6 – Dismissed Lack of Prosecution
- 7 – Dismissed – Pros Motion/Vic Req
- 8 – Conditional Discharge
- D – Dismissed- Prosecutor Discretion
- M – Dismissed- Mediation
- P – Dismissed-Plea Agreement
- S – Disposed at Superior
- W – Dismissed-False ID

Related Traffic Tickets and Complaints:

JUDGE'S SIGNATURE _____

DATE _____

ORIGINAL - Court Action

Page 2 of 7

NJ/CDR1 1/1/2017

COMPLAINT - SUMMONS (DEFENDANT'S COPY)

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> <i>VS.</i> RAYMOND J QUINONES	
0307	S	2022	000028		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.		
CHESTERFIELD TWP MUNICIPAL COURT 1 MUNICIPAL DRIVE BORDENTOWN NJ 08505-0000 609-298-2802 COUNTY OF: BURLINGTON				ADDRESS BEACHWOOD NJ 08722-3508	
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 2020-04459		DEFENDANT INFORMATION	
COMPLAINANT NAME: ROSS PORTNER				SEX: M EYE COLOR: BROWN DOB: 1973 DRIVER'S LIC. #. DL STATE: NJ SOCIAL SECURITY #: xxx-xx- SBI #: () TELEPHONE #. LIVESCAN PCN #.	

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 04/08/2020 in **CHESTERFIELD TWP**, **BURLINGTON County, NJ** did: WITHIN THE JURISDICTION OF THIS COURT, WITHIN THE JURISDICTION OF THIS COURT, ON OR ABOUT APRIL 8, 2020, IN THE TOWNSHIP OF CHESTERFIELD, IN THE COUNTY OF BURLINGTON, DID KNOWINGLY MAKE, PRESENT, OFFER FOR FILING OR USE ANY RECORD, DOCUMENT OR THING KNOWING IT TO BE FALSE, AND WITH PURPOSE THAT IT BE TAKEN AS A GENUINE PART OF INFORMATION OR RECORDS BELONGING TO, OR RECEIVED OR KEPT BY, THE GOVERNMENT FOR INFORMATION OR RECORD, OR REQUIRED BY LAW TO BE KEPT BY OTHERS FOR INFORMATION OF THE GOVERNMENT, WITH THE PURPOSE TO DEFRAUD OR INJURE ANYONE, THAT IS, THE SAID RAYMOND QUINONES, WHILE EMPLOYED BY THE DEPARTMENT OF CORRECTIONS, KNOWINGLY MADE ONE OR MORE FALSE ENTRIES IN A SPECIAL CUSTODY REPORT, PREPARED BY QUINONES IN CONNECTION WITH HIS DUTIES AS A SENIOR CORRECTION POLICE OFFICER FOR THE DEPARTMENT OF CORRECTIONS AT THE GARDEN STATE YOUTH CORRECTIONAL FACILITY, IN VIOLATION OF N.J.S.A. 2C:28-7(A) (THIRD DEGREE). THIS CASE IS BEING PROSECUTED BY DAG ADAM GERKEN, OF THE OFFICE OF PUBLIC INTEGRITY AND ACCOUNTABILITY.

in violation of:

Original Charge	1) 2C:28-7A(1)	2)	3)
Amended Charge			

CERTIFICATION:

I certify that the foregoing 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

Signed: ROSS PORTNER Date: 05/24/2022

The complaining witness is a law enforcement officer and a judicial probable cause determination is not required prior to the issuance of this Complaint-Summons.

SUMMONS

YOU ARE HEREBY SUMMONED to appear before the **Superior Court** in the county of: **BURLINGTON**
at the following address: **BURLINGTON COUNTY**
CRIMINAL COURTS **49 RANCOCAS ROAD** **MT HOLLY** **NJ 08060-0000**
If you fail to appear on the date and at the time stated below, a warrant may be issued for your arrest.
Date of Arrest: **05/24/2022** Appearance Date: **06/30/2022** Time: **09:00AM** Phone: **609-288-9500**
Signature of Person Issuing Summons: ROSS PORTNER Date: 05/24/2022

- Domestic Violence – Confidential Related Traffic Tickets or Other Complaints Serious Personal Injury/ Death Involved

Special conditions of release:

- No phone, mail or other personal contact w/victim
 No possession firearms/weapons
 Other (specify):

COMPLAINT - SUMMONS (DEFENDANT'S COPY)

RETURN OF SERVICE INFORMATION

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> <i>VS.</i> RAYMOND J QUINONES	
0307	S	2022	000028	ADDRESS :	
<small>COURT CODE</small>	<small>PREFIX</small>	<small>YEAR</small>	<small>SEQUENCE NO.</small>		
CHESTERFIELD TWP MUNICIPAL COURT 1 MUNICIPAL DRIVE BORDENTOWN NJ 08505-0000 609-298-2802 COUNTY OF: BURLINGTON				BEACHWOOD NJ 08722-3508	
<small># of CHARGES</small> 1	<small>CO-DEFTS</small>	<small>POLICE CASE #:</small> 2020-04459		<small>DEFENDANT INFORMATION</small>	
<small>COMPLAINANT</small> ROSS PORTNER <small>NAME:</small> 25 MARKET ST P O BOX 085 TRENTON NJ 08625			<small>SEX:</small> M <small>EYE COLOR:</small> BROWN <small>DOB:</small> 1973	<small>DL STATE:</small> NJ	
			<small>DRIVER'S LIC. #:</small>		
			<small>SOCIAL SECURITY #</small> xxx-xx-	<small>SBI #:</small>	
			<small>TELEPHONE #:</small> ()		
			<small>LIVESCAN PCN #:</small>		

By certification or on oath, the complainant says that to the best of his/her knowledge, information and belief the named defendant on or about 04/08/2020 in CHESTERFIELD TWP, BURLINGTON County, NJ did: WITHIN THE JURISDICTION OF THIS COURT, WITHIN THE JURISDICTION OF THIS COURT, ON OR ABOUT APRIL 8, 2020, IN THE TOWNSHIP OF CHESTERFIELD, IN THE COUNTY OF BURLINGTON, DID KNOWINGLY MAKE, PRESENT, OFFER FOR FILING OR USE ANY RECORD, DOCUMENT OR THING KNOWING IT TO BE FALSE, AND WITH PURPOSE THAT IT BE TAKEN AS A GENUINE PART OF INFORMATION OR RECORDS BELONGING TO, OR RECEIVED OR KEPT BY, THE GOVERNMENT FOR INFORMATION OR RECORD, OR REQUIRED BY LAW TO BE KEPT BY OTHERS FOR INFORMATION OF THE GOVERNMENT, WITH THE PURPOSE TO DEFRAUD OR INJURE ANYONE, THAT IS, THE SAID RAYMOND QUINONES, WHILE EMPLOYED BY THE DEPARTMENT OF CORRECTIONS, KNOWINGLY MADE ONE OR MORE FALSE ENTRIES IN A SPECIAL CUSTODY REPORT, PREPARED BY QUINONES IN CONNECTION WITH HIS DUTIES AS A SENIOR CORRECTION POLICE OFFICER FOR THE DEPARTMENT OF CORRECTIONS AT THE GARDEN STATE YOUTH CORRECTIONAL FACILITY, IN VIOLATION OF N.J.S.A. 2C:28-7(A) (THIRD DEGREE). THIS CASE IS BEING PROSECUTED BY DAG ADAM GERKEN, OF THE OFFICE OF PUBLIC INTEGRITY AND ACCOUNTABILITY.

in violation of:	1) 2C:28-7A(1)	2)	3)
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Check √	Certification by Police Regarding Complaint-Summons
✓	I certify that I served the complaint-summons by delivering a copy to the defendant personally.
	I certify that I personally served the complaint-summons by leaving a copy at the defendant's usual place of abode with a competent member of the household of the age 14 or over _____ <small>Name of family member over 14 years of age</small>
	I certify that I mailed a copy of the complaint-summons by ordinary mail to the defendant at his or her last known address. _____ <small>Defendant's last known address</small>
	I certify that I served the complaint-summons by delivering a copy to a person authorized to receive service of process on the defendant's behalf. _____ <small>Name and title of authorized person</small>
	Other manner of service: I certify that I served the complaint-summons in the following manner: _____
	I certify that I was unable to serve the complaint-summons.

Signed: ROSS PORTNER NJ DIVISION OF CRIM JUSTICE Date of Action: 05/24/2022
Name, Title and Department of Officer

Affidavit of Probable Cause

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> VS. RAYMOND J QUINONES	
0307	S	2022	000028		
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	ADDRESS <div style="display: flex; justify-content: space-between;"> BEACHWOOD NJ 08722-3508 </div>	
CHESTERFIELD TWP MUNICIPAL COURT 1 MUNICIPAL DRIVE BORDENTOWN NJ 08505-0000 609-298-2802 COUNTY OF: BURLINGTON					
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 2020-04459		DEFENDANT INFORMATION SEX: M EYE COLOR: BROWN DOB: /1973 DRIVER'S LIC. #. DL STATE: NJ SOCIAL SECURITY #: xxx-xx- SBI #: () TELEPHONE #: () LIVESCAN PCN #:	
COMPLAINANT NAME: ROSS PORTNER			NJ 08625		

Purpose: This Affidavit/Certification is to more fully describe the facts of the alleged offense so that a judge or authorized judicial officer may determine probable cause.

1. Description of relevant facts and circumstances which support probable cause that (1) the offense(s) was committed and (2) the defendant is the one who committed it:
 Raymond Quinones is employed by the New Jersey Department of Corrections (DOC) as a Senior Correction Police Officer. On or about April 8, 2020, at approximately 12:05 A.M., Quinones was assigned to the Garden State Youth Correctional Facility in Chesterfield Township and conducted a cell extraction of Victim 1 while on duty and working in his official capacity. During an initial approach, a Sergeant sprayed Victim 1 with Oleoresin Capsicum (OC) spray, without giving Victim 1 any opportunity to comply, and despite Victim 1 offering to be handcuffed. Quinones then joined a five-person suited team, which re-approached Victim 1's cell. The Sergeant sprayed Victim 1 with OC again without giving Victim 1 an opportunity to comply. Quinones then entered the cell and forcibly removed Victim 1. Victim 1 screamed in pain and left his cell covered in blood. Victim 1 was given an inhaler and oxygen in the infirmary, and was treated for lacerations on his face. DOC policy only permits use of force that is objectively necessary and reasonable; it requires that an inmate be given an opportunity to comply before a forced cell extraction proceeds. DOC CUS.001.UF.002, IIIA, IVF. In his special custody report, Quinones falsely stated that when the team arrived at Victim 1's cell he "refused to cuff up" and "[w]hen the cell door opened, [Victim 1] was combative," knowing that Victim 1 was not given any opportunity to comply. By filing a false report, Quinones intended to deceive others within the DOC into believing that the use of force on Victim 1 was justified.

Affidavit of Probable Cause

COMPLAINT NUMBER

0307

S

2022

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COURT CODE

PREFIX

YEAR

SEQUENCE NO.

THE STATE OF NEW JERSEY

VS.

RAYMOND J QUINONES

2. I am aware of the facts above because: (Included, but not limited to: your observations, statements of eyewitnesses, defendant's admission, etc.)

documents received, footage reviewed

3. If victim was injured, provide the extent of the injury:

victim was injured and received medical treatment

Certification:

I certify that the foregoing 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.

Signed: ROSS PORTNER LAW ENFORCEMENT OFFICER

Date: 05/24/2022

Affidavit of Probable Cause

Preliminary Law Enforcement Incident Report

COMPLAINT NUMBER				<i>THE STATE OF NEW JERSEY</i> VS. RAYMOND J QUINONES
0307	S	2022	000028	
COURT CODE	PREFIX	YEAR	SEQUENCE NO.	
CHESTERFIELD TWP MUNICIPAL COURT 1 MUNICIPAL DRIVE BORDENTOWN NJ 08505-0000 609-298-2802 COUNTY OF: BURLINGTON				
ADDRESS				BEACHWOOD NJ 08722-3508
# of CHARGES 1	CO-DEFTS	POLICE CASE #: 2020-04459		DEFENDANT INFORMATION
COMPLAINANT ROSS PORTNER NAME: 25 MARKET ST P O BOX 085 TRENTON NJ 08625				SEX: M EYE COLOR: BROWN DOB: 1973 DRIVER'S LIC. #. DL STATE: NJ SOCIAL SECURITY #: xxx-xx- SBI #: () TELEPHONE #: LIVSCAN PCN #:

Purpose: The Preliminary Law Enforcement Incident Report (PLEIR) is intended to document basic information known to the officer at the time of its preparation. It is recognized that additional relevant information will emerge as an investigation continues. The PLEIR shall be in addition to, not in lieu of, any regular police arrest, incident, or investigation reports. Note that the PLEIR is specific to each defendant charged in an investigation.

- The offense/incident was recorded using electronic/surveillance via:
 - Other/Explain video footage
- The defendant was known to the victim as:
 - Other/Explain inmate
- The victim was injured and:
 - Victim treated at the scene

Certification:

I certify that the foregoing 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.

Signed: ROSS PORTNER LAW ENFORCEMENT OFFICER Date: 05/24/2022