

SATTIRAJU & THARNEY, LLP

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Attorneys for Plaintiff Irene Colao

IRENE COLAO,

Plaintiff,

v.

NORTH ARLINGTON PUBLIC LIBRARY;
JOHN/JANE DOES (these names being
fictitious as their present identities are
unknown); ABC CORPORATIONS (these
names being fictitious as their present
identities are unknown),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MONMOUTH COUNTY
DOCKET NO.

CIVIL ACTION

**COMPLAINT AND JURY TRIAL
DEMAND**

Plaintiff, Irene Colao (hereinafter “Plaintiff” or “Colao”), by way of Complaint against Defendants, North Arlington Public Library; John/Jane Does (these names being fictitious as their present identities are unknown); and ABC Corporations (these names being fictitious as their present identities are unknown), alleges as follows:

THE PARTIES & VENUE

1. Plaintiff resides in the City of Manalapan, Monmouth County, in the State of New Jersey.
2. Defendant, North Arlington Public Library (“NAPL” or the “Defendant”), a New Jersey business entity with its principal business address being 210 Ridge Road, North Arlington, New Jersey 07031, had Plaintiff in its employ during the relevant time periods herein.

3. NAPL was at all relevant times herein an “employer” of Plaintiff for purposes of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq. (the “LAD”).

4. Defendants ABC CORPORATIONS and/or JOHN/JANE DOES are currently unknown entities and/or natural persons, designated by fictitious names herein, who may also be liable to Plaintiff under the LAD.

5. Venue is proper in Monmouth County pursuant to R. 4:3-2(b) because Plaintiff resides therein.

SPECIFIC ALLEGATIONS

6. Plaintiff was employed at NAPL since January 2017 at the Circulation Desk, with a 9 (nine) month gap from around May 2021 through January 2022.

7. Plaintiff was a hard-working dedicated employee who ran numerous successful programs at NAPL.

8. Over the course of Plaintiff’s entire employment at NAPL, the Director of NAPL, Leo Bellino, subjected Plaintiff to an ongoing campaign of harassment, discrimination and hostile work environment on a near daily basis in violation of the LAD.

9. When Plaintiff mentioned she was having her pastor over for Thanksgiving, Mr. Bellino mocked her religion and commented she was having “Jesus Christ” coming over for dinner.

10. Plaintiff’s son married a female of Indian descent and Mr. Bellino commented that Plaintiff’s grandchildren will have shaved heads and worship a monkey God.

11. When Plaintiff asked why she was docked time when she was ill with Covid-19 when others were not, Mr. Bellino said she is “full of shit.”

12. Mr. Bellino made racial comments about the patrons who would come into the library, including referring to the African American patrons by the N-word, and comment that because he (Mr. Bellino) is gay, no one would believe he is racist.

13. Mr. Bellino would make sexual comments about Plaintiff's daughter to other NAPL employees stating that Plaintiff's daughter is "fucking everyone."

14. Regarding a female employee who has cats, Mr. Bellino stated this employee probably puts cat food between her legs and calls out "here, kitty."

15. Joseph Bellino is Mr. Bellino's father and often spent time at NAPL.

16. Mr. Bellino allowed, and in fact encouraged, his father, Joseph Bellino to make inappropriate and demeaning comments towards Ms. Colao and other women at NAPL.

17. Ms. Colao told Mr. Bellino that she felt his father's comment was unacceptable and that Joseph Bellino needed to apologize. Mr. Bellino's response was not only that she would not get an apology, but she is a 'fat slob.'

18. Mr. Bellino's discriminatory comments were more intimidating and upsetting because he has a violent temper, which is easily triggered.

19. The president of the library board, Ben Inzinna, would also make offensive comments in the library.

20. Mr. Inzinna would make sexually explicit comments, that included, but were not limited to saying he had a rod put in his penis so he could always have sex.

21. Mr. Inzinna also touted that he wanted to cheat on, or even kill, his wife.

22. Mr. Inzinna referred to the women working in the library as 'old hens' and suggested to one of the older employees that she retire.

23. The constant profanity and the degrading, demeaning, and discriminatory comments were too much for Ms. Colao to bear and she was forced to leave NAPL in September 2022.

24. Ms. Colao was constructively discharged because she would not have left but for the hostile work environment to which she was subjected.

COUNT ONE

(VIOLATION OF THE LAW AGAINST DISCRIMINATION)

25. Plaintiff repeats and reiterates each of the above allegations of the Complaint as though fully set forth herein.

26. Defendants' actions against Plaintiff violate the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq. (the "LAD").

27. The Defendants' conduct in violating the LAD was especially egregious, malicious and/or engaged in with willful disregard of Plaintiff's rights and committed by members of the Defendants' upper management.

28. As a result of Defendants' unlawful conduct, Plaintiff has endured significant damages including, but not limited to, physical and bodily injuries, severe emotional distress, humiliation, embarrassment, personal hardship, career and social disruption, psychological and emotional harm, economic losses, and other such damages.

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in her favor and against Defendants, together with (i) all legally available damages to be determined at trial, with interest; (ii) punitive damages; (iii) pre-judgment and post-judgment interest at the highest rates allowed by law; (iv) attorneys' fees, costs and expenses with appropriate enhancement; and (v) all other legally permissible relief that the Court deems appropriate and just.

DEMAND TO PRESERVE EVIDENCE

DEMAND IS HEREBY MADE that all Defendants preserve all physical and electronic information pertaining or relating in any way to: (a) Plaintiff's employment; (b) her claims as alleged and asserted in this Complaint; (c) any and all defenses thereto; and (d) pertaining or relating to any electronic data storage, digital images, computer images, cache memory, searchable data, emails, spreadsheets, employment files, memos, text messages and any and all online social or work related websites, entries on social networking sites (including, but not limited to, Facebook, Twitter, Myspace, LinkedIn, etc.) and any other information and/or data and/or things and/or documents which may pertain to any claim or defense concerning this Complaint. Failure to do so may result in separate claims for spoliation of evidence and/or for appropriate adverse inferences.

DEMAND FOR JURY TRIAL

Pursuant to Rule 4:35-1, Plaintiff hereby demands a trial by jury as to all issues so triable.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:5-1(c), Ravi Sattiraju, Esq. is hereby designated as trial counsel for Plaintiff.

CERTIFICATION PURSUANT TO R. 4:5-1(b)(2)

I hereby certify, pursuant to Rule 4:5-1, that the matter in controversy herein is the subject of no other pending legal proceeding or arbitration nor is any other legal proceeding contemplated to the best of my information and belief. Further, I know of no other party who should be joined in this lawsuit other than the currently unidentified John/Jane Does and ABC Corporations.

CERTIFICATION PURSUANT TO R. 4:5-1(b)(3)

I hereby certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

SATTIRAJU & THARNEY, LLP
Attorneys for Plaintiff,
Irene Colao

By: s/ Ravi Sattiraju
Ravi Sattiraju

Dated: March 22, 2023

Civil Case Information Statement

Case Details: MONMOUTH | Civil Part Docket# L-000891-23

Case Caption: COLAO IRENE VS NORTH ARLINGTON
PUBL IC LIBRAR

Case Initiation Date: 03/22/2023

Attorney Name: RAVI SATTIRAJU

Firm Name: SATTIRAJU & THARNEY, LLP

Address: 50 MILLSTONE RD BLDG 300, STE 202

EAST WINDSOR NJ 08520

Phone: 6094692110

Name of Party: PLAINTIFF : COLAO, IRENE

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: LAW AGAINST DISCRIMINATION (LAD) CASES

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: IRENE COLAO? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? YES

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

03/22/2023

Dated

/s/ RAVI SATTIRAJU

Signed

