

Form A

Meredith Adele Godfrey  
Plaintiff's Name (first, middle, last)

Street Address

City, State, Zip

Telephone Number

Frank M. Gilliam  
Defendant's Name (first, middle, last)

Street Address

City, State, Zip

Telephone Number

Superior Court of New Jersey  
Law Division, Special Civil Part

Atlantic County

Docket Number

(to be provided by the court)

Civil Action  
Complaint

RECEIVED - CIVIL PART  
MAR 11 2019  
SUPERIOR COURT OF NEW JERSEY  
ATLANTIC COUNTY

Type or print the reasons you, the Plaintiff(s), are suing the Defendant(s): (See instruction B)  
Attach additional sheets if necessary.

Please see attached

The amount you, the Plaintiff(s) are demanding from the Defendant(s) \$ 10,082.00

At the trial Plaintiff will need:

An interpreter  Yes  No Indicate language: \_\_\_\_\_  
An accommodation for disability  Yes  No Indicate accommodation: \_\_\_\_\_

I certify that the matter in controversy is not the subject of any other court action or arbitration proceeding, now pending or contemplated, and that no other parties should be joined in this action.

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).

03/04/2019  
Date

Meredith Godfrey  
Your Signature

Meredith Godfrey  
Name Typed, Stamped or Printed

CRT	SCP	DATE	3/4/19
DOC	DC	AMT	82
CLK	PR	BATCH	954
CC	CK	CA	MO
NUMBER	4731		

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONNELL FOLEY LLP  
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185 Hudson Street, Suite 2510  
Jersey City, New Jersey 07311  
(201) 521-1000

Attorneys for Plaintiff, MEREDITH ADELE GODFREY

MEREDITH ADELE GODFREY  
[REDACTED]  
[REDACTED]

Plaintiff,

v.

FRANK M. GILLIAM  
[REDACTED]  
[REDACTED]

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - SPECIAL CIVIL PART  
ATLANTIC COUNTY

DOCKET NO.:

Civil Action

COMPLAINT

Plaintiff, MEREDITH ADELE GODFREY ("Ms. Godfrey" and/or "Plaintiff") by way of  
Complaint says:

**PARTIES**

1. Plaintiff, Ms. Godfrey is an individual who lives at [REDACTED]  
[REDACTED]

2. Upon information and belief Defendant, FRANK M. GILLIAM ("Gilliam" and/or  
"Defendant") lives at [REDACTED]. Defendant is presently  
the Mayor of Atlantic City, New Jersey.

**Count I**  
**(Theft and Conversion)**

3. Plaintiff and Defendant had a close personal relationship.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. Defendant asked Ms. Godfrey by text message on August 16, 2018, to lend him \$5,000 purportedly to pay an attorney for trademark advice regarding a tourism slogan for Atlantic City.

5. Pursuant to Gilliam's request, Ms. Godfrey made a withdrawal on August 17, 2018 of \$5,000 from her Bank of America checking account, as documented in a withdrawal receipt and text messages between Ms. Godfrey and Gilliam.

6. On that same day, August 17, 2018, Godfrey delivered the loan to Gilliam, with the expectation that he would pay her back as soon as possible.

7. On October 7, 2018, Godfrey demanded by text immediate repayment of the loan.

8. Gilliam did not reply to this request.

9. On October 10, 2018, Ms. Godfrey again requested repayment of the loan.

10. Gilliam did not pay back the loan.

11. On November 28, 2018, counsel for Ms. Godfrey sent a letter demanding repayment of the loan to which Ms. Godfrey has received no response.

12. The debt remains unpaid.

13. Ms. Godfrey has a right to immediate repayment of the loan.

14. By refusing to pay Ms. Godfrey back, Defendant wrongfully converted \$5,000 of her money.

**Count II**  
**(Breach of Contract)**

15. Plaintiff repeats the previous paragraphs as if set forth at length.

16. The agreement between the two parties constituted a contract.

17. By refusing to pay back the loan, the Defendant has breached that contract.

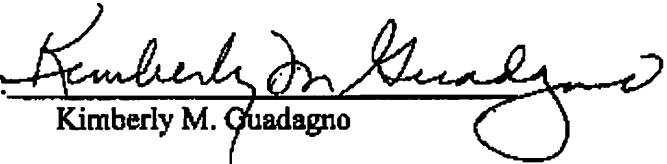
18. As a result of this breach, Ms. Godfrey has suffered damages.

**WHEREFORE** Plaintiff, Ms. Godfrey, demands that Judgment be entered in her favor and against the Defendant Gilliam awarding Plaintiff compensatory damages, together with pre-judgment interest, costs of suit, counsel fees and such other relief as the Court deems just and appropriate.

**RULE 4:5-1 CERTIFICATION**

The undersigned hereby certifies that the matter in controversy is not the subject of any other pending action in any Court or of a pending arbitration proceeding. No such other action or arbitration proceeding is contemplated. I further certify that I am unaware of any other party who should be joined in this action. The undersigned recognizes a continuing obligation during the course of this litigation to file and serve on all parties and with the Court an amended certification if there is a change in the facts stated in this original certification.

CONNELL FOLEY LLP  
Attorneys for Plaintiff  
MEREDITH ADELE GODFREY

By:   
Kimberly M. Quadagno

Dated: March 4, 2019