

DEVON TYLER BARBER,
Plaintiff/Movant, Pro Se
3536 Pacific Avenue, Apt. A5
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – CIVIL PART
ATLANTIC COUNTY

DEVON TYLER BARBER,
Plaintiff, Pro Se,
v.
TOWNSHIP OF HAMILTON, et al.,
Defendants.

Docket No.: **ATL-L-003252-25**

**PLAINTIFF'S PROCEDURAL
CERTIFICATION**

*(Regarding Written Submissions;
in Lieu of Oral Argument)*

I, **Devon Tyler Barber**, of full age, hereby certify as follows:

1. I am the Plaintiff in this matter and submit this Certification to assist the Court in its consideration of the pending **Order to Show Cause**.
2. Due to documented neurological and anxiety-related limitations, I experience difficulty processing, organizing, and responding accurately during extended or high-stress oral proceedings.
3. To ensure clarity, accuracy, and efficiency for the Court, I have therefore presented my factual statements, procedural history, and positions in **written certifications submitted in advance**, rather than relying primarily on oral argument.

4. The New Jersey Judiciary has previously acknowledged and approved reasonable accommodations permitting reliance on **written submissions and advance review of filings**, including in matters pending before this Court.
5. I respectfully submit that the written record, including my Verified Complaint and Supplemental Certifications, fully sets forth the factual and procedural issues relevant to the Court's consideration of interim relief.
6. I respectfully request that the Court consider this matter **on the written submissions unless the Court determines that oral argument would materially assist its review**, in which event I will comply with any direction given by the Court.
7. This request is made in good faith, for purposes of accuracy and effective participation, and not to delay proceedings or limit the Court's discretion.

I certify that the foregoing statements are true. I am aware that if any statement is willfully false, I am subject to punishment.

Dated: 12/20/2025

/s/ **Devon Tyler Barber**
Devon Tyler Barber
Plaintiff, Pro Se

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**PLAINTIFF'S SUPPLEMENTAL
CERTIFICATION**

(In Support of Order to Show Cause)

I, **Devon Tyler Barber**, of full age, hereby certify as follows:

1. I am the Plaintiff in this matter and submit this Supplemental Certification in advance of the Court's December 22, 2025 Order to Show Cause hearing to provide factual context regarding my conduct, intentions, and good-faith engagement with municipal authorities.
2. I am not evading the law, rejecting governmental authority, or asserting any extralegal status. I am an **informed New Jersey citizen** who has consistently sought transparency, due process, and accountability through lawful statutory and judicial channels.
3. Since **2022**, I have undertaken sustained efforts to stabilize my life following prior housing instability, re-establish lawful employment, and comply with all court and administrative processes. Although I am currently housed, **reliable access to my vehicle is integral to maintaining that stability**. The loss of access to my vehicle has had **immediate and compounding effects** on my ability to work, obtain basic household necessities, access

religious observances, attend court proceedings, and carry out the ordinary activities required to maintain housing and personal stability.

4. I am not refusing or avoiding compliance with insurance or registration requirements.

However, continued impoundment of my vehicle **prevents me from arranging insurance coverage and lawful use**, as I lack possession, access, and the financial ability to absorb ongoing towing and storage charges. If the vehicle is released, I am prepared to take reasonable steps toward lawful compliance consistent with my financial circumstances.

5. Since approximately **2022**, apart from a **civil wage dispute** and a **pending post-conviction relief application relating to an older matter**, I have **not been criminally charged, arrested, or cited** by any law-enforcement agency. All law-enforcement encounters giving

rise to criminal or civil litigation during 2024 and 2025 have involved the Hamilton Township Police Department, rather than any other agency.

6. In furtherance of transparency and accountability—not obstruction—I submitted two written requests under the Open Public Records Act (“OPRA”):

- a. **A May 8, 2024 OPRA request (OPRA No. 1962)** seeking body-worn camera footage and oaths of office related to a May 7, 2024 police encounter; and
- b. **A March 11, 2025 OPRA request** seeking municipal insurance, indemnification, and risk-management records associated with police activity.

7. These requests cited OPRA, were submitted in writing, and sought routine administrative and evidentiary records commonly maintained and produced by New Jersey municipalities.

8. The May 2024 request resulted in the imposition of a **\$267.78 special service charge** for access to approximately 153 minutes of body-worn camera footage—evidence directly

bearing on alleged police conduct—despite my indigency and the public-interest nature of the request.

9. The March 11, 2025 OPRA request received **no response of any kind**—no acknowledgment, no clarification request, no denial, and no extension—despite OPRA’s mandatory response requirements. I thereafter submitted a formal internal review request to preserve the record and seek compliance.
10. These OPRA requests preceded the incident at issue and constituted my primary documented interactions with Hamilton Township and its Police Department during that period.
11. In discovery submitted by Defendants in opposition to my Order to Show Cause, I observed a Computer-Aided Dispatch (“CAD”) notation stating, in substance, that:
“Devon is a sovereign citizen and is highly confrontational with law enforcement.”
12. I deny that characterization in its entirety.
13. I have never claimed to be a “sovereign citizen,” rejected the authority of New Jersey courts, refused lawful process, or asserted immunity from the law. To the contrary, I have consistently engaged through formal filings, certifications, motions, discovery requests, and OPRA submissions grounded in New Jersey statutes and court rules.
14. My conduct during police encounters has consisted of verbal communication, requests for explanation, and reliance on written documentation and lawful process. I did not threaten officers, attempt to flee, strike anyone, or interfere with officer duties beyond resisting unexplained confinement as described below.

15. The CAD notation described above appears **prior to or contemporaneous with officer arrival and escalation**, indicating that it functioned as **pre-contact intelligence** rather than a post-incident impression formed after observation. I was never notified of this designation, given an opportunity to contest it, or informed of the basis for its inclusion prior to the encounter.
16. I am not aware of any factual predicate, prior adjudication, or verified source that would justify such a designation being entered into a dispatch or intelligence system.
17. The CAD notation is not a statement of fact, but a **label** that inaccurately reframes lawful, informed civic engagement as ideological extremism or hostility.
18. Such a label is materially significant because it is capable of influencing officer perception, discretionary decision-making, escalation, and the manner in which authority is exercised during a police encounter.
19. After I was forcibly removed from my vehicle, officers attempted to place me into a police vehicle **without first clearly announcing that I was under arrest**, identifying any charge, **or explaining the reason for my detention**. In response, I **physically resisted being forced into the vehicle** by bracing myself and refusing to comply, while **verbally demanding to speak with a supervising sergeant and asking for clarification**. I did not strike any officer, attempt to flee, or use violence. My resistance consisted of refusing to submit to unexplained confinement while seeking communication and lawful process.
20. Rather than functioning as community-caretaking or de-escalation, the responses I encountered demonstrate how discretionary authority can be informed by unsupported characterizations rather than observable conduct.

21. I submit this Certification so the Court may assess my actions based on what I **did and filed**, rather than on labels applied without notice, verification, or opportunity to respond.

22. I am asking this Court for protection of process, not privilege; accountability, not immunity. I remain willing to comply with all lawful orders of this Court and to proceed in good faith.

I certify that the foregoing statements are true. I am aware that if any statement is willfully false, I am subject to punishment.

Dated: 12/20/2025

/s/ **Devon Tyler Barber**
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Plaintiff, Pro Se

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CERTIFICATE OF SERVICE

I, **Devon Tyler Barber**, hereby certify that on **December 20th, 2025**, I served a true and correct copy of the foregoing **Plaintiff's Supplemental Certification (In Support of Order to Show Cause)** upon the following parties of record by electronic service and/or email, in accordance with the New Jersey Court Rules:

Kenneth M. Warren Jr., Esq.
Leonard, Warren & Leonard, L.L.C.
Ken@LeonardWarrenLeonard.com

I certify that the foregoing statements are true. I am aware that if any statement is willfully false, I am subject to punishment.

Dated: December 20th, 2025

/s/ **Devon Tyler Barber**
Devon Tyler Barber
Plaintiff, Pro Se