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B. G.,

*Plaintiff(s)*

vs.

BARRINGTON FIRE COMPANY NO. 1 d/b/a  
BARRINGTON FIRE COMPANY,  
BOROUGH OF BARRINGTON, RICHARD  
RETTINGER, III, individually and as  
agent/representative of BARRINGTON FIRE  
COMPANY, DEFENDANT DOE #1-10, and  
DEFENDANT DOE DEPT. #1-10 (inclusive,  
fictitiously named defendants) jointly and  
severally,

*Defendants*

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
CAMDEN COUNTY

Docket No:

*Civil Action*

**COMPLAINT, JURY DEMAND,  
DESIGNATION OF TRIAL COUNSEL  
AND DEMAND FOR DISCOVERY**

Plaintiff, B.G., residing in Barrington, County of Camden, State of New Jersey, by way  
of Complaint against the defendants, says:

**PARTIES AND VENUE**

1. The plaintiff, B.G., was at all relevant times herein, a minor when the incidents of  
sexual, physical, and psychological abuse and improper conduct described herein took place.

2. The defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON  
FIRE COMPANY, is a nonprofit corporation organized and existing under the laws of the State

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of New Jersey, with a principal place of business address located at 201 2nd Avenue, Barrington, New Jersey, 08007. BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY operates under the supervision of the State Board and is deemed a place/places of public accommodations as defined by *N.J.S.A. 10:5-5(1)*.

3. The defendant, BOROUGH OF BARRINGTON, is a municipal corporation, incorporated and existing under the laws of the State of New Jersey, that regularly conducts business in the State of New Jersey, with a principal address located at 229 Trenton Avenue, Barrington, County of Camden and State of New Jersey.

4. The defendant, RICHARD RETTINGER, III, is a citizen and resident of New Jersey.

5. At all times material hereto, RICHARD RETTINGER, III, was the fire chief and/or assistant fire chief of defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY.

6. Individual defendants in the above caption case identified as Defendant Doe 1-10 (said names being fictitious, and hereinafter referred to as “Defendant Doe”), were, at all relevant times, employees and/or agents of the Defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or the Defendant, BOROUGH OF BARRINGTON, were responsible for the hiring, admitting, assigning, retaining, and supervising of employees and/or individuals, including RICHARD RETTINGER, III. The identification of these individuals is not known by the plaintiff at this time in the absence of discovery. Plaintiff reserves the right to substitute the name(s) for those agents designated as Defendant Doe when and if such information becomes available.

7. Corporate defendants in the above caption case identified as Defendant Doe Dept.

1-10 (said names being fictitious, and hereinafter referred to as “Defendant Doe Dept.”) were, at all relevant times, incorporated and/or established associations, corporations, fire departments, entities, facilities, or other establishments that employed, hired, certified, assigned, retained, supervised, managed, oversaw, directed, administrated, and/or otherwise controlled one or more of the defendants at or during all relevant times. These Defendant Doe Depts. were/are vicariously and derivatively liable for the negligent conduct of the aforementioned defendants under the theories of respondeat superior, masterservant, agency, and/or right of control.

8. Venue is properly laid in the Superior Court of Camden County, New Jersey pursuant to R.4:3-2(a) and/or (b).

#### **FACTS COMMON TO ALL COUNTS**

9. In April 2015, the BOROUGH OF BARRINGTON, by Resolution, established a Junior Fire Auxiliary under the direct supervision of the BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY.

10. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, were empowered to supervise and control all employees and/or agents within BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, and/or BOROUGH OF BARRINGTON, including defendant, RICHARD RETTINGER, III.

11. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, had/has access to and knowledge of information regarding

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the sexual, physical, and psychological abuse and misconduct of employees and/or agents, including knowledge of abusive conduct of individuals within the BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON's business, including defendant, RICHARD RETTINGER, III.

12. At all relevant times, defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10 in this action acted by and through their ostensible/aided agents, servants, and employees, which include entities and/or individuals over whom they had control or right of control.

13. At all times material hereto, defendant, RICHARD RETTINGER, III was acting as a fire chief, employee, agent, servant, representative and/or ostensible/aided agent hired, certified, assigned, retained, supervised, managed, overseen, directed, administrated, and/or otherwise controlled by and for one or more of the Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, and was engaged to perform services for the Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, and was subject to the Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10's oversight, supervision, management, direction, control, ostensible/aided control, and/or right to control the physical conduct required to perform such services.

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14. The defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, were the principals of RICHARD RETTINGER, III, and the defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, acted only through the natural persons who were its employees, agents, servants, representatives, and/or ostensible/aided agents hired, certified, assigned, retained, supervised, managed, overseen, directed, administrated, and/or otherwise controlled by and for said defendants

15. RICHARD RETTINGER, III acted as the fire chief, employee, agent, servant, representative, and/or ostensible/aided agent of the defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, and acted negligently while in the scope of his duties or authority, such that the negligence as a matter of law charged to the principal, here the defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10.

16. At all times material hereto, the defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, are deemed negligent for the wrongdoing to the same extent as the employer, employee, agent, servant, representative, and/or ostensible/aided agent, RICHARD RETTINGER, III.

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17. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, through its employee, fire chief, agent, and servant, had authority and responsibility to address discrimination and improper conduct (physical or otherwise) and to institute corrective measures, and who had actual or constructive knowledge of improper conduct and discrimination, and who despite such knowledge, failed to adequately respond to stop improper conduct and discrimination against the plaintiff and took affirmative steps which resulted directly in severe sexual, physical, and psychological abuse and improper conduct of the plaintiff.

18. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, were responsible for promulgation and enforcement of all policies, customs, and practices for the BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10.

19. At all times, the plaintiff, B.G., was a cadet and/or junior firefighter at defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY.

20. Plaintiff, B.G., suffered extraordinary and severe harm due to the sexual, physical, and psychological abuse and assaults committed from 2016 through 2019 by defendant, RICHARD RETTINGER, III, and the hostile environment at BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON that was created by defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON, which the defendants failed to

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correct and to properly address despite their actual and/or constructive knowledge thereof and due to the negligence outlined below.

21. Before and/or during 2016 through 2019, defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON, knew and/or had reason to know that defendant, RICHARD RETTINGER, III, engaged in the offense of flagrantly inappropriate conduct, sexual, physical, and psychological abuse which would violate the laws of New Jersey.

22. Defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON, failed to take appropriate actions to protect plaintiff against sexual, physical, and psychological abuse and improper conduct at BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON despite having actual notice of the past sexual, physical, and psychological abuse and improper conduct by defendant, RICHARD RETTINGER, III, all in violation of the rights guaranteed to plaintiff by the laws of New Jersey.

23. Defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON, acted individually and through its employees and agents whose names and identities are not currently known, all of which acted with actual or apparent authority and all of whom aided in carrying out and/or permitting the sexual, physical, and psychological abuse and assaults of the plaintiff by the actions and inactions of defendants.

24. Defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON, acting through its administrators, and other employees and agents, knew and/or should have known about the sexual, physical, and

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psychological abuse and improper conduct committed by defendant, RICHARD RETTINGER, III, and was deliberately or recklessly indifferent to this conduct, as demonstrated by the specific failures described below, thereby exposing and continuing to expose students in general, and plaintiff in particular, to a hostile work environment.

25. Defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON, should have been aware of the sexual, physical, and psychological abuse and improper conduct committed by Defendant RICHARD RETTINGER, III, for which the plaintiff asserts claims pursuant to the New Jersey Law Against Discrimination (“LAD”) violations.

26. Defendants, through their actions and inactions described herein, and through a pattern of deliberate and/or reckless indifference, created and permitted a severe, pervasive, and persistently hostile environment, in violation of New Jersey’s Law Against Discrimination (“LAD”).

27. During and/or before 2016 through 2019, defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON, knew and/or had reason to know that defendant, RICHARD RETTINGER, III, posed a risk to members of the Junior Fire Auxiliary and other female minors and yet permitted him to serve as fire chief and/or assistant fire chief in their fire department.

28. The indifference of defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON, to the risks posed by defendant, RICHARD RETTINGER, III, and its affirmative acts created and/or permitted the opportunity for RICHARD RETTINGER, III to commit sexual, physical, and psychological abuses of plaintiff, which resulted in a hostile environment.

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29. At all times material hereto, Plaintiff, B.G., was between the ages of fourteen (14) and seventeen (17) years old and a member of the Junior Fire Auxiliary at BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY.

30. At all times material hereto, RICHARD RETTINGER, III was a fire chief and/or assistant fire chief (and employee, agent, and/or apparent/ostensible/aided agent) at BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY.

31. Upon information and belief, the sexual, physical, and psychological abuse of B.G. by RICHARD RETTINGER, III began in 2016 when B.G. was 15 years old.

32. Upon information and belief, the sexual, physical, and psychological abuse and improper conduct by RICHARD RETTINGER, III, occurred from 2016 through 2019.

33. On or about April 8, 2022, RICHARD RETTINGER, III pleaded guilty to N.J.S.A. 2C:14-3B "Criminal Sexual Contact."

34. Upon information and belief, the sexual, physical, and psychological abuse and improper conduct by RICHARD RETTINGER, III, was a common occurrence, and RICHARD RETTINGER, III's unlawful and egregious behavior towards minor female cadets and/or junior firefighters, such as the plaintiff B.G. was at all times accepted by the BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON.

35. Upon information and belief, the BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON permitted RICHARD RETTINGER, III to sexually abuse and harass B.G. from 2016 through 2019.

36. At all material times hereto, defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT

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DOE #1-10, and DEFENDANT DOE DEPT. #1-10, knew or should have known that RICHARD RETTINGER, III abused children and/or was not fit to serve as employee, agent, servant, representative and/or ostensible/aided agent.

37. The improper conduct of the plaintiff was purposeful, intentional, and willful and was undertaken by members of the BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON staff.

38. Because the improper conduct was intentionally egregious, and because it was participated in by members of the BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON staff, punitive damages are warranted.

39. The BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON are further responsible sexual, physical, and psychological abuse and improper conduct because it failed to reasonably promulgate a policy prohibiting the same and because members of the staff participated in and/or were willfully indifferent to the improper conduct.

40. The BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON are further liable in this matter because employees of BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON's staff were witnesses of the improper conduct, and failed to take prompt effective remedial measures to correct the improper conduct.

41. As a result of the unlawful conduct outlined above, plaintiff has suffered harm.

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**COUNT I****(Negligence)**

42. Plaintiff(s) adopts and incorporates the allegations of the preceding paragraphs as if set forth more fully at length herein.

43. The recklessness, negligence and/or carelessness of Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, by and through their actual or apparent supervisors, employees, agents, servants, representatives, and/or ostensible/aided agents hired, certified, assigned, retained, supervised, managed, overseen, directed, administrated, and/or otherwise controlled by and for said defendants, consisted of, among other things, the following:

- a. Failing to properly screen staff, employees, agents, servants, representatives, and ostensible/aided agents adequately before placing them in close contact with children;
- b. Failure to properly investigate complaints of abuse, inappropriate behavior and/or other sexual abusive behavior;
- c. Providing “cover” and/or rationalizations for inappropriate/abusive misconduct by applying euphemistic and false designations to and/or contrived and imagined explanations for their conduct and/or the reasons for same;
- d. Minimizing, ignoring or excusing inappropriate or questionable behavior and/or misconduct by staff, employees, agents, servants, representatives, and ostensible/aided agents over a period of months, years and/or decades;

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- e. Failure to properly and/or adequately warn parents, children, and/or the public at large, including, but not limited to, plaintiff and similarly situated children, and their parents and/or family members, regarding the inappropriate behavior and/or misconduct of RICHARD RETTINGER, III, other defendants, and/or other abusive staff, employees, agents, servants, representatives, and/or ostensible/aided agents, despite knowledge of the dangers they presented and the harmful and complicit culture and environment created by such failures to warn;
- f. Assigning employees, agents, servants, representatives, and/or ostensible/aided agents known to have engaged in questionable and/or inappropriate behavior or misconduct and/or known to be sexual predators, including but not limited to, RICHARD RETTINGER, III, and/or other defendants, to a position in the business where said individual(s) had/have regular contact with children;
- g. Failure to report criminal activity, including child sexual abuse, to appropriate law enforcement agencies;
- h. Negligent failure to provide a safe environment and protective culture to children within the public and community, and/or other external locations operated, visited, and/or owned and/or operated by defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, and RICHARD RETTINGER, III;
- i. Failure to implement and maintain proper and effective policies and

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procedures to prevent sexual abuse of and/or other abusive behavior toward children;

- j. Negligently maintaining custody, supervision and protection of minor cadets and/or junior firefighters placed in their care by virtue of their authority and solicitation of minors to participate in their business and/or activities;
- k. Failure to properly train staff, employees, agents, servants, representatives, and/or ostensible/aided agents to identify signs of child abuse or inappropriate related behavior to children by fellow staff, employees, associates, and/or individuals within its control, oversight, supervision, and/or ostensible/aided control;
- l. Negligent reliance on persons who claimed they could treat abusive individuals;
- m. Negligent retention of and/or failure to terminate RICHARD RETTINGER, III, other defendants, and/or other inappropriate and/or abusive individuals from or associated with the BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY's fire department, promoting a culture and environment of complicity, denial and deception regarding child abuse within the business;
- n. Failure to exercise due care under the relevant circumstances;
- o. Recklessly, negligently and/or carelessly failing to observe, manage, direct, oversee, and supervise the relationship between Plaintiff, B.G., and RICHARD RETTINGER, III;
- p. Recklessly, negligently and/or carelessly failing to have proper and effective

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policies and procedures to require adequate observation, management, oversight, and supervision of the relationship between B.G. and RICHARD RETTINGER, III, and/or other defendants;

- q. Recklessly, negligently and/or carelessly failing to recognize RICHARD RETTINGER, III's conduct and behavior prior to the events in question and/or as described herein as creating a risk of abuse toward children, including, but not limited to, B.G.;
- r. Recklessly, negligently and/or carelessly failing to have proper policies and procedures to require adequate observation, management, oversight, and supervision of B.G. and RICHARD RETTINGER, III, and/or other defendants;
- s. Failing to investigate complaints that RICHARD RETTINGER, III was behaving inappropriately and/or touching children inappropriately, including, but not limited to, B.G.;
- t. Recklessly, negligently and/or carelessly failing to identify RICHARD RETTINGER, III as a sexual abuser;
- u. Recklessly, negligently and/or carelessly failing to investigate behavior of RICHARD RETTINGER, III that put the defendants on notice and/or should have placed defendants on notice that RICHARD RETTINGER, III was and/or might have been a potential sexual predator;
- v. Failure to use due care under the circumstances; and/or
- w. Negligence as may be proven from facts now exclusively in the possession of defendants, which may be ascertained after the filing of this Complaint.

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44. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, and RICHARD RETTINGER, III, were negligent under the facts as detailed within this complaint in that these defendants failed to use that degree of care, precaution and vigilance which a reasonably prudent person or entity would use under the same or similar circumstances, including, but not limited to, the negligent affirmative acts detailed in this complaint which a reasonably prudent person or entity would not have done, and also the negligent omission or failure to act and/or take precautions as detailed in this complaint which a reasonably prudent person or entity would have done or taken under these circumstances.

45. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, DEFENDANT DOE DEPT. #1-10, and are vicariously liable for both the negligent and intentional acts of RICHARD RETTINGER, III, their employee(s).

**WHEREFORE**, Plaintiff, B.G., demands judgment against defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10 (inclusive, fictitiously named defendants) jointly and severally, and in the alternative, together with compensatory damages, interest, costs of suit, attorney's fees, enhanced attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

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**COUNT II****(Negligent Supervision)**

46. Plaintiff(s) adopts and incorporates the allegations of the preceding paragraphs as if set forth more fully at length herein.

47. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, knew or should have known of the need to properly and effectively observe, manage, direct, oversee, and/or supervise employees, agents, servants, representatives, and/or ostensible/aided agents in their relationships with young children.

48. Defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, knew or should have known of the particular risk posed by RICHARD RETTINGER, III based on, among other things, his inappropriate and/or questionable conduct, his history of physically abusing children, and/or sexually abusing minor children.

49. The negligence, carelessness, and/or recklessness of Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, for the conduct of their actual or apparent employees, agents, servants, representatives, and/or ostensible/aided agents, in the hiring, certifying, assigning, observation, retaining, supervision,

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management, oversight, direction, administration, and/or otherwise control of RICHARD RETTINGER, III consists of one or more of the following:

- a. Negligent hiring, certifying, assigning, observation, retaining, supervision, management, oversight, direction, administration, and/or otherwise control of individuals in the employ of BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON;
- b. Failing to use due care in hiring, certifying, assigning, observation, retaining, supervision, management, oversight, direction, administration, and/or otherwise control of RICHARD RETTINGER, III and his respective relationship with plaintiff, B.G.; and
- c. Failing to investigate and supervise RICHARD RETTINGER, III and his relationship with B.G.

**WHEREFORE**, Plaintiff, B.G., demands judgment against defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10 (inclusive, fictitiously named defendants) jointly and severally, and in the alternative, together with compensatory damages, interest, costs of suit, attorney's fees, enhanced attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

### **COUNT III**

#### **(Negligent Hiring and Retention)**

50. Plaintiff(s) adopts and incorporates the allegations of the preceding paragraphs as

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if set forth more fully at length herein.

51. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, knew and/or should have known prior to and/or contemporaneous with the relevant time frame during which B.G. was sexually abused by RICHARD RETTINGER, III that plaintiff and other young children affiliated and/or associated with the fire department were vulnerable to and potential victims of sexual abuse and improper conduct.

52. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, also knew and/or should have known prior to and/or contemporaneous with the relevant time frame during which B.G. was sexually abused by RICHARD RETTINGER, III that the access to vulnerable minor children, together with the trust and authority placed in her position, makes the position an enticing vocation to predators, and/or others seeking to sexually abuse and exploit children.

53. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, owed a duty to exercise reasonable care in the hiring, certifying, assignment, control, selection and/or retention of employees, agents, servants, representatives, and/or ostensible/aided agents, situated in and/or located at the Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-

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10, and DEFENDANT DOE DEPT. #1-10, and specifically a duty to be on high look out for possible sexual predators, and others seeking to abuse children.

54. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, failed to exercise reasonable care in the hiring, certifying, assignment, control, selection and/or retention of RICHARD RETTINGER, III as a fire chief, employee, agent, servant, representative, and/or ostensible/aided agent, among other things, the following:

- a. Failing to conduct a thorough and proper background check of RICHARD RETTINGER, III;
- b. Failing to thoroughly and reasonably investigate RICHARD RETTINGER, III's history;
- c. Failing to learn of or investigate RICHARD RETTINGER, III's history of his proclivity to sexually abuse minor children;
- d. Failing to conduct a thorough and proper interview with RICHARD RETTINGER, III;
- e. Failing to use due care in the selection of RICHARD RETTINGER, III as a fire chief and/or employee interacting with the community and minor children;
- f. Failing to use due care in the retention of RICHARD RETTINGER, III as a fire chief and/or providing community services near young vulnerable children;
- g. Recklessly, negligently and/or carelessly failing to adequately check

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RICHARD RETTINGER, III's background, before employment and/or entrustment with overseeing minor children who were members of the Junior Fire Auxiliary of the fire department;

- h. Recklessly, negligently and/or carelessly failing to have policies and procedures in place to screen individuals for the possibility of being sexual predators.

**WHEREFORE**, Plaintiff, B.G., demands judgment against defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10 (inclusive, fictitiously named defendants) jointly and severally, and in the alternative, together with compensatory damages, interest, costs of suit, attorney's fees, enhanced attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

#### **COUNT IV**

##### **(Gross Negligence)**

55. Plaintiff(s) adopts and incorporates the allegations of the preceding paragraphs as if set forth more fully at length herein.

56. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, were grossly negligent under the facts as detailed within this Complaint in that these defendants acted

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or failed to act: with complete disregard of the rights, safety, and well-being of others; in a palpably unreasonable manner; in an outlandish fashion; with discriminatory behavior; and/or failed to exercise slight care or diligence under these circumstances.

**WHEREFORE**, Plaintiff, B.G., demands judgment against defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10 (inclusive, fictitiously named defendants) jointly and severally, and in the alternative, together with compensatory damages, interest, costs of suit, attorney's fees, enhanced attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

### **COUNT V**

#### **(Intentional Infliction of Emotional Distress)**

57. Plaintiff(s) adopts and incorporates the allegations of the preceding paragraphs as if set forth more fully at length herein.

58. The actions and/or inactions of Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, jointly, severally, and/or through the conduct of RICHARD RETTINGER, III intentionally inflicted emotional distress upon plaintiff in that RICHARD RETTINGER, III acted intentionally, willfully, and/or recklessly, in that his actions were intended to cause, or done with deliberate disregard to a high degree of probability that such

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behavior would cause emotional distress.

59. The actions and/or inactions of Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, jointly, severally, and/or through the conduct of RICHARD RETTINGER, III, against plaintiff were extreme and outrageous; with discriminatory behavior; so outrageous in character and so extreme in degree as to go beyond all possible bounds of decency and are regarded as atrocious and utterly intolerable in our civilized community.

60. The actions and/or inactions of Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, jointly, severally, and/or through the conduct of RICHARD RETTINGER, III, was the direct and/or proximate cause of emotional distress to the plaintiff, which was so severe that no reasonable person could be expected to endure such distress.

61. The conduct of Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, jointly, severally, and/or through the conduct of RICHARD RETTINGER, III was sufficiently severe to cause genuine and substantial emotional distress and/or mental harm to the average person, including the plaintiff.

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62. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, are vicariously liable for the damages caused by RICHARD RETTINGER, III's intentional infliction of emotional distress upon the plaintiff.

**WHEREFORE**, Plaintiff, B.G., demands judgment against defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10 (inclusive, fictitiously named defendants) jointly and severally, and in the alternative, together with compensatory damages, interest, costs of suit, attorney's fees, enhanced attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

### **COUNT VI**

#### **(Breach of Fiduciary Duty)**

63. Plaintiff(s) adopts and incorporates the allegations of the preceding paragraphs as if set forth more fully at length herein.

64. By virtue of their status as a community fire department and/or adult authorities, Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, bore a fiduciary relationship to plaintiff and other children and persons within and/or affiliated, employed, and/or near the fire department.

65. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually

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and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, had fiduciary duties to avoid harming children and to protect them from harm at the hands of employees, agents, servants, representatives, and/or ostensible/aided agents hired, certified, assigned, retained, supervised, managed, overseen, directed, administrated, and/or otherwise controlled by and for said defendants.

66. Defendants breached their fiduciary duties by acting or failing to act in accordance with their fiduciary duties and/or as alleged in this Complaint.

67. Plaintiff suffered the above-averred harms and damages as a result of Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, breach of their fiduciary duty.

**WHEREFORE**, Plaintiff, B.G., demands judgment against defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative of BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10 (inclusive, fictitiously named defendants) jointly and severally, and in the alternative, together with compensatory damages, interest, costs of suit, attorney's fees, enhanced attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

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## **COUNT VII**

### **(Law Against Discrimination, violation of N.J.S.A. Section 10:5-1 et seq. Sexually Hostile Environment and Discrimination)**

68. Plaintiff(s) adopts and incorporates the allegations of the preceding paragraphs as if set forth more fully at length herein.

69. Despite defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and/or DEFENDANT DOE DEPT. #1-10, actual and/or constructive knowledge of RICHARD RETTINGER, III's inappropriate and harassing conduct, defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, failed to reasonably protect plaintiff, B.G., against harassing and sexual conduct on the basis of her sex (female), age (minor), and permitted a hostile working environment.

70. These defendants violated New Jersey's Law Against Discrimination ("LAD"), contained within N.J.S.A. Section 10:5-1 et seq., and such failures created an intimidating, offensive or hostile environment for Plaintiff, B.G., and discriminated against plaintiff based upon her sex (female) and age (minor).

71. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, are vicariously liable for the actions and/or inactions of its supervisory employees.

72. Defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON

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FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, knew, or should have known, of the past lewd conduct and/or sexual abuse committed by RICHARD RETTINGER, III and failed to take effective remedial measures to end his offensive conduct.

73. The harassing conduct would not have occurred, but for the plaintiff's gender (female), and age (minor), which is/are a protected category under New Jersey's Law Against Discrimination. At all times material hereto and to the best knowledge of plaintiff, the defendant, RICHARD RETTINGER, III, sexually abused other cadets and/or junior firefighters in the Junior Fire Auxiliary at BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, and all of the cadets and/or junior firefighters were young females of minority age.

74. At all times material hereto, the conduct of defendant, RICHARD RETTINGER, III, sexually infantilized these sexually abused cadets and/or junior firefighters, including, but not limited to plaintiff, B.G.

75. The sexual harassment created or permitted by these defendants of Plaintiff was so severe such that any reasonable person would believe that the conditions of employment were altered and that the environment was intimidating, hostile, offensive or abusive.

76. As a direct and proximate result of the breaches and failures by these defendants, plaintiff was caused to suffer bodily injury, emotional distress/injury, injuries which are likely to be permanent in nature.

77. In the alternative, defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative of BARRINGTON FIRE

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COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, are liable for damages caused to Plaintiff for the reasons outlined through this Complaint and within this Count and such violations caused Plaintiff's injuries and damages.

78. As a direct and proximate result of defendants' conduct described herein, plaintiff, B.G., was caused to suffer emotional and physical injuries and symptoms as described in this Complaint, and has incurred and/or will likely incur future expenses for medical and psychological treatment.

**WHEREFORE**, Plaintiff, B.G., demands judgment against defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10 (inclusive, fictitiously named defendants) jointly and severally, and in the alternative, together with compensatory damages, interest, costs of suit, attorney's fees, enhanced attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

### **COUNT VIII**

#### **(Assault and Battery)**

79. Plaintiff(s) adopts and incorporates the allegations of the preceding paragraphs as if set forth more fully at length herein.

80. Defendant, RICHARD RETTINGER, III, assaulted plaintiff, B.G., for which claims of assault are brought.

81. Defendant, RICHARD RETTINGER, III, performed physical abuse and sexual abuse, improper conduct and/or acts upon plaintiff, B.G., without her consent and/or without her

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consent as she was a minor.

82. Defendant, RICHARD RETTINGER, III, unlawfully touched plaintiff, B.G., without her consent for which claims for battery are brought.

83. As a direct and proximate result of defendants' conduct described herein, plaintiff, B.G., was caused to suffer emotional and physical injuries and symptoms as described in this Complaint, and has incurred and/or will likely incur future expenses for medical and psychological treatment. For these actions, plaintiff seeks damages, including punitive damages, from these defendants to the extent allowed by New Jersey law.

**WHEREFORE**, Plaintiff, B.G., demands judgment against defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, BOROUGH OF BARRINGTON, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10 (inclusive, fictitiously named defendants) jointly and severally, and in the alternative, together with compensatory damages, interest, costs of suit, attorney's fees, enhanced attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

### **COUNT IX**

#### **(Punitive Damages)**

84. Plaintiff(s) adopts and incorporates the allegations of the preceding paragraphs as if set forth more fully at length herein.

85. The aforesaid acts of defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10, were committed in outrageous and wanton

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and willful disregard for the safety, protection, and well-being of minors, including the plaintiff, and including, but not limited to discriminatory behavior; and overall behavior so beyond the pale warranting the imposition of punitive damages.

**WHEREFORE**, Plaintiff, B.G., demands judgment against defendants, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY, RICHARD RETTINGER, III, individually and as agent/representative and/or fire chief of BARRINGTON FIRE COMPANY, DEFENDANT DOE #1-10, and DEFENDANT DOE DEPT. #1-10 (inclusive, fictitiously named defendants) jointly and severally, and in the alternative, together with compensatory damages, interest, costs of suit, attorney's fees, enhanced attorney's fees, and such other legal and equitable relief as the Court deems appropriate.

#### **JURY DEMAND**

Plaintiff demands a trial by jury on all issues.

#### **TRIAL DESIGNATION**

Pursuant to R. 4:25-4, the undersigned, John W. Trimble, Jr., Esquire, is hereby designated as trial counsel.

#### **NOTICE PURSUANT TO R. 1:5-1(a) and R. 4:17-4(a)**

**TAKE NOTICE** that the undersigned attorney, counsel for the plaintiff, does hereby demand, pursuant to R. 1:5-1(a) and 4:17-4(a) that each party herein serving pleadings and interrogatories and receiving answers thereto, serve copies of all such pleadings and answered interrogatories received from any party, including any documents, papers and other material referred to therein, upon the undersigned attorneys, and **TAKE NOTICE** that this is a continuing demand.

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**NOTICE PURSUANT TO R. 4:17-1, -2 and -4**

**TAKE NOTICE** that upon the service of this Complaint on any and all defendants, it is deemed to have been served simultaneously served with the appropriate Uniform Interrogatories and answers to these Uniform Interrogatories shall be served to the propounding party within 60 days after the Answer to the Complaint has been filed. Plaintiff hereby demands responsive answers to Form C and Form C(1) Interrogatories within the time prescribed by the above-referenced New Jersey Court Rules from all defendants.

**DEMAND FOR PRODUCTION OF DOCUMENTS**

Pursuant to R. 4:10-2, *et seq.*, and R. 4:18-1, plaintiff hereby demands that the defendants, and each of them, provide copies of all discoverable materials within thirty (30) days after the service of this complaint.

If the defendant believes something is not discoverable, please identify the item or information and state why it is not discoverable. If the item cannot be copied, please state what it is so a mutually convenient date and time can be agreed upon for inspection or reproduction of the item.

1. The entire contents of any investigation file or files and any other documentary material in your possession which supports or relates to the allegations of defendant's answer (excluding references to mental impressions, conclusions or opinions representing the value or merit of the claim or defense or respecting strategy or tactics and privileged communications to and from counsel).

2. Copies of any and all statements, whether recorded, written or verbal, signed or unsigned, taken from any part to this litigation or any employee of a party or any other non-party.

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3. Copies of any and all statements, written, typed or verbal in nature, upon which you will rely upon at trial or which are relevant to the incident in question or to the injuries, damages and losses claimed.

4. Copies of any and all police investigation reports regarding this incident.

5. Copies of any incident report prepared or completed by the plaintiff or any defendants in this lawsuit.

6. Any and all documents identified by defendant in its answers to Plaintiff's Interrogatories.

7. Any and all documents referred to in preparing your answers to the Plaintiff's Interrogatories.

8. Any and all documents which you may or will use as an exhibit at trial or any evidentiary hearing in this matter.

9. Any and all documents which you have provided to any expert or lay witnesses who may or will be called to testify on your behalf at trial or any evidentiary hearing in this matter.

10. Any and all written or recorded statements from any party to this action, or its agents, servants or employees, pertaining to the matters alleged in Plaintiffs' Complaint or the defenses asserted in the defendant's Answer.

11. Any and all investigative reports, both governmental and private, concerning the transactions or occurrences which are the subject of this litigation, including but not limited to any such reports by experts who are expected to be called as witnesses.

12. Any and all documents, reports, or other records which relate to or which you contend relate to the matters alleged in the Plaintiff's Complaint or defenses asserted in the

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defendant's Answer that have been obtained from any party to this action or their agents, employees, representatives or attorneys.

13. Any and all tests, treaties or articles which you intend to rely upon at trial, including those referred to by your experts and those used or to be used in the examination or cross-examination of any experts to be called by any part to this action.

14. Any and all documents pertaining to the compensation paid to any expert witness who you may call to testify at trial.

15. Any and all documents produced by you to any other party or person in connection with this lawsuit.

16. Copies of any photographs, slides, videotapes and/or motion pictures in your client's or your client's representative's possession, pertaining to the incident, and the injuries or damages sustained.

17. Copies of all written reports concerning the incident which is the subject matter of this lawsuit prepared in the regular course of business operations or practices of any person, firm, corporation, association or other public or private entity.

18. Any and all documents containing the name and home business address of all individuals contacted as potential witnesses.

19. Identify the username, email address and password for any Facebook, Twitter, My Space, LinkedIn or other Social Media Account(s) maintained by you for a period of six (6) months prior to the date of the incident through the present time.

20. Produce a complete copy of all wall postings or tweets for any and all Facebook, Twitter, My Space, LinkedIn or other Social Media Account(s) maintained by you for a period of six (6) months prior to the incident through the present time.

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**CERTIFICATION PURSUANT TO R. 4:5-1**

Pursuant to R. 4:5-1, the undersigned hereby certifies that there are no other actions or arbitrations pending or contemplated involving the subject matter of this controversy at this time, and there are no additional known parties who should be joined to the present action at this time.

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.

**TRIMBLE & REGISTER**

*Attorneys for Plaintiff(s)*



By: \_\_\_\_\_

JOHN W. TRIMBLE, JR., ESQUIRE

KATRINA M. REGISTER, ESQUIRE

Dated: October 8, 2024

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**FOR IMMEDIATE RELEASE**

**Law Office of Trimble & Register Announces Legal Action Against Barrington Fire Company No. 1 d/b/a Barrington Fire Company, Borough of Barrington, Richard Rettinger, III for Sexual Assault of a Minor.**

**Barrington, NJ – October 8, 2024** – The Law Office of Trimble & Register filed a lawsuit against Barrington Fire Company No. 1 d/b/a Barrington Fire Company, Borough of Barrington, Richard Rettinger, III, following the sexual assault of a minor.

The Complaint alleges B.G., a minor, was a cadet and/or junior firefighter with Barrington Fire Company No. 1 when she suffered extraordinary and severe harm due to the sexual, physical, and psychological abuse and assaults committed from 2016 through 2019 by the defendant, RICHARD RETTINGER, III, the Chief of the fire company. The complaint alleges a hostile environment at BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON was created by defendant, BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON, which the defendants failed to correct and to properly address despite their actual and/or constructive knowledge thereof.

The Complaint alleges that the defendants knew or should have known about the sexual, physical, and psychological abuse and improper conduct committed by the defendant, RICHARD RETTINGER, III, and were deliberately or recklessly indifferent to his improper conduct and failed to protect the minor.

"Our client was a vulnerable minor when these reprehensible acts took place, causing profound and lasting trauma. We are unwavering in our commitment to seeking justice for our client and ensuring those responsible are held fully accountable for their actions," said Katrina M. Register, Esquire of Trimble & Register. The Law Office of Trimble & Register urges anyone with additional information regarding this incident or other similar incidents at the BARRINGTON FIRE COMPANY NO. 1 d/b/a BARRINGTON FIRE COMPANY and/or BOROUGH OF BARRINGTON to come forward. Please immediately contact the Law Office of Trimble & Register.

Please contact:

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**About Law Office of Trimble & Register:**

The Law Office of Trimble & Register represents victims of sexual abuse and neglect and catastrophic personal injury matters. Our mission is to advocate for the rights of our clients and ensure that justice is served.