

JACOBS & BARBONE, P.A.

EDWIN J. JACOBS, JR.
ejacobs@jacobsbarbone.law
LOUIS M. BARBONE
lbarbone@jacobsbarbone.law

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
1125 PACIFIC AVENUE
ATLANTIC CITY, NEW JERSEY 08401
PHONE: (609) 348-1125
FAX: (609) 348-3774
WEBSITE: WWW.JACOBSBARBONE.LAW

DAVID CASTALDI
dcastaldi@jacobsbarbone.law
JORDAN L. BARBONE
jbarbone@jacobsbarbone.law
PATRICK C. JOYCE
pjoyce@jacobsbarbone.law

March 5, 2026

TORT CLAIM NOTICE

Via Certified Mail (RRR) and Regular Mail to:

William E. Reynolds, Acting Prosecutor
Atlantic County Prosecutor's Office
4997 Unami Boulevard
P.O. Box 2002
Mays Landing, New Jersey 08330

Dennis Levinson, County Executive
Department of Administration
County Executive Offices
1333 Atlantic Avenue, 8th Floor
Atlantic City, New Jersey 08401

Re: Marty Small, Sr. et al. v. William Reynolds, et al.
Our File No. 18,750

Dear Messrs. Reynolds & Levinson:

Please be advised that this office represents Marty Small, Sr., La'Quetta Small and Constance Days-Chapman in a potential civil lawsuit to be filed in the Law Division of the Superior Court of New Jersey, Atlantic County. This letter is being forwarded to you in accordance with the terms of N.J.S.A. 59:8-1 et seq., and is intended to advise you of my clients' claims against you and your entities. Pursuant to N.J.S.A. 59:8-4, I offer the following information with respect to that claim.

1. **The Name and Address of the Claimants:**

Marty Small, Sr. & La'Quetta Small
[REDACTED]
Atlantic City, New Jersey 08401

Constance Days-Chapman
[REDACTED]
Atlantic City, New Jersey 08401

2. **Address to Deliver Notices:**

Jordan L. Barbone, Esquire
Jacobs & Barbone, P.A.
1125 Pacific Avenue
Atlantic City, New Jersey 08401

3. **Date, Place & Circumstances of the Incident Which Gave Rise to the Claim Asserted:**

This claim arises out of the malicious and improper investigation and indictment that you engineered and directed to be presented to a grand jury in a conspiracy with members of the Republican Party to have Marty Small, Sr. removed as the Mayor of the City of Atlantic City. The indictment against Marty Small, Sr. was prepared by you and returned September 17, 2024, charging Child Endangerment in the second degree, terroristic threats in the third degree and aggravated assault in the third degree. The indictment against La'Quetta Small was prepared by you and charged second degree Child Endangerment. The indictment against Constance Days-Chapman was prepared by you and charged second-degree Official Misconduct. Each indictment was a complete fabrication without any factual or legal basis and more importantly, without any reasonable or probable cause for the initiation of criminal prosecution against my clients. The indictments, their presentation, their return and your direction that they be prepared, presented and returned against my clients was strictly and exclusively a function of your exertion and use of power under the color of state law for your own personal advantage and the advantage of members of the Republican Party as well as benefit and personal political aspirations for you and other Republican Party members, namely Marty Small, Sr. removal from Mayoral Office. You knew at all times that the factual allegations upon which the indictments were based could not and did not in any way establish the *prima facie* elements of any crimes under New Jersey law. You knew further that the factual basis upon which you proceeded could in no way establish the essential elements of the criminal charges brought against my clients. You knew that your witnesses told untruths and that lead investigator Detective Sergeant Ryan Ripley advised that Jada Small's claims were false and that there was no probable cause to file criminal complaints against either Marty Small, Sr. or La'Quetta Small. The indictment prepared by you and filed against Constance Days-Chapman was implemented for no other reason than to pressure and coerce Chapman to give incriminating information against Marty Small, Sr. that was false to ultimately achieve Marty Small, Sr.'s removal from Mayoral Office.

On December 18, 2025, the jury returned a not guilty verdict on each of the four indicted counts against Marty Small, Sr. The indictments against both La'Quetta Small and Constance Days-Chapman were thereafter dismissed.

Claimants hereby give notice that they intend a civil action, namely violations of New Jersey Civil Rights Act and specifically, Selective Prosecution under the Act which will also include (but will not be limited to) claims based upon the common law tort of malicious prosecution, as well as the constitutional tort of malicious prosecution given actual malice pursuant to N.J.S.A. 59:3-14(a) and (b) as well as your willful misconduct in initiating and bringing the aforementioned prosecutions. Claimants also give notice of additional causes of action including but not limited to: False Arrest/Imprisonment and Negligent Infliction of Emotional Distress.

4. **General Description of the Injury, Damage or Loss Incurred:**

The injuries, damages and losses suffered by my clients include not only emotional pain, suffering, upset, as well as personal and professional reputational injury and damage, but also economic loss and damages proximately caused by your initiation of a groundless and baseless criminal prosecution. Claimants have suffered violations of their state and federal statutory and constitutional rights. The full extent of my clients' claims and injuries remain under investigation.

5. **The Name or Names of the Public Entity, Employee or Employees Causing the Injury, Damage or Loss:**

The public entities and its employees that have caused, contributed to and inflicted the injuries, damages and losses set forth herein include (but are not limited to) William E Reynolds, the architect of the indictment as well as those subordinates and functionaries that assisted him in the malicious prosecution, including but not limited to, the following: Atlantic County Executive Dennis Levinson, Atlantic County Prosecutor Office Detective Sergeant Ryan Ripley, and Detective Hannah Piot, Detective Daniel Cho, and potentially others.

6. **Amount Claimed:**

As noted above, the full extent of my clients' claims and injuries remain under investigation. As such, the amount of damages is incapable of being determined or quantified at the present time.

Very truly yours,

JACOBS & BARBONE, P.A.



Jordan L. Barbone

JLB:lsg

cc: Marty Small, Sr.
La'Quetta Small
Constance Days-Chapman

