

Jeremy M. Glapion (N.J. Attorney ID No. 145972015)
The Glapion Law Firm, LLC
1704 Maxwell Drive
Wall, New Jersey 07719
Tel.: 732-455-9737
Email: jmg@glapionlaw.com
Plaintiff Pro Se

JEREMY M. GLAPION,

Plaintiff,

v.

LEISURE VILLAGE WEST
ASSOCIATION, INC.,

Defendant.

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
GENERAL EQUITY PART
OCEAN COUNTY**

DOCKET NO. OCN-C-00182-26

Civil Action

**CERTIFICATION OF JEREMY M.
GLAPION IN SUPPORT OF ORDER TO
SHOW CAUSE WITH TEMPORARY
RESTRAINTS**

I, Jeremy M. Glapion, of full age, certify as follows:

1. I am the plaintiff in this action and an attorney admitted to practice in New Jersey, appearing pro se. I have personal knowledge of the facts stated in this certification. I submit it under R. 4:52-1(a) in support of my application for an order to show cause with temporary restraints. It sets forth the specific facts on which the application rests.

The Unit and My Membership

2. I own the unit at [REDACTED], Leisure Village West, Manchester Township, New Jersey (the "Unit"), and have owned it since July 22, 2022. As the owner, I am a member of defendant Leisure Village West Association, Inc. (the "Association"). Exhibit A to the Complaint is a true copy of the Association's Bylaws, which I obtained directly from the Association's document portal on its website.

3. I was a member entitled to vote in the Association's August 31, 2026 Board election.

4. I do not reside in the unit; my mother does.

Adoption of the Speech Policy

5. On July 6, 2026, my mother received (and forwarded to me) an email from Community Manager Thomas Hasko transmitting a draft Member Conduct Policy and a draft Social Media Policy for consideration at the Board's August 5, 2026 meeting. Exhibit B to the Complaint is a true copy of that email. Exhibit C to the Complaint is a true copy of the original agenda for that meeting obtained from the Association website.

6. On July 6, 2026, I sent Mr. Hasko and Association counsel Michael Polulak, Esq. a written objection to both drafts. Exhibit D to the Complaint is a true copy.

7. On July 31, 2026, I received the Association's notice revising the August 5 agenda, together with the revised agenda. Exhibits E and F to the Complaint are true copies. The notice states that the language of the withdrawn Social Media Policy was summarized and incorporated into Section 1, Letter G of the proposed Member Conduct Policy.

8. On July 31, 2026, I sent Mr. Hasko and Mr. Polulak a second written objection. Exhibit G to the Complaint is a true copy.

9. I was unable to attend the August 5, 2026 Board meeting in person. A video recording of the meeting is posted at <https://www.youtube.com/watch?v=2i7kdjv1jUM>. I have reviewed that recording, and the statements quoted in paragraph 10 are accurately transcribed from it.

10. At the meeting, residents repeatedly asked Mr. Polulak and Board members to identify the line between permitted criticism and a violation of the proposed policy. At 2:08:10–2:08:25, Trustee Maiocco, now Board President, said that “you have to trust that the people that

you put in here in power will do the right thing.” At 2:08:45–2:08:59, then-Trustee Leslierandal said disagreement with the Board was permitted “as long as it’s done in a civil manner.” At 2:14:36–2:14:48, Mr. Polulak said that what constitutes harassment “is subjective and it depends on context.” At 2:15:01–2:15:18, he identified “frequency,” “loudness,” and “aggressiveness” as factors. At 1:55:53–1:56:03, Mr. Polulak said the policy was drafted broadly to give the Board “enough leverage” to address situations. At 1:58:02–1:58:13, Mr. Polulak acknowledged that decisions in the Association’s alternative dispute resolution process are nonbinding.

11. The Board adopted the Policy Resolution Relating to Member Conduct at the August 5 meeting (the “Speech Policy”). Exhibit H to the Complaint is a true copy of the Speech Policy as adopted, which I obtained from the Association’s website on September 28, 2026.

12. On August 9, 2026, Mr. Polulak wrote to me confirming that the Board had adopted the Speech Policy and had not authorized its rescission. His letter cited Declaration Section 10; Bylaws Article VI, Sections 1 and 1(n); and Bylaws Article IX, Sections 1 and 2 as the sources of the Board’s authority. Exhibit I is a true copy of the Amended and Consolidated Master Deed and Declaration of Restrictive and Protective Covenants of Leisure Village West Association, Inc., (the “Master Deed”). Paragraph 10 of its Declaration of Restrictive and Protective Covenants is the “Declaration Section 10” cited in Mr. Polulak’s letter. I obtained the Master Deed from the Association’s website..

13. Ballots for the August 31, 2026 election were, to the best of Plaintiff’s knowledge, mailed on or about July 29, 2026. Voting concluded on August 31, 2026, when the Association announced that Jane Siegmund, Mark Kasiewniak, and Al D’Amato were elected to three-year terms.

The Speech Policy's Effect on My Speech

14. While I had not previously been involved in Association governance, I became interested and highly concerned upon receipt of the July 6 email and draft policies, which I found to be an extreme and absurd overreach under the Bylaws, the New Jersey Constitution, and a general sense of fairness.

15. I also felt, and feel, that the Board was not honest about its reasons for implementing the Speech Policy—feelings which grew stronger upon learning the timing of the Speech Policy relative to the Board election.

16. As a result of this overreach, I intend to be more watchful, involved, and, when deserved, vocally critical of Association governance.

17. Nevertheless, since August 5, 2026, I have withheld or toned down statements I otherwise would have made, limiting them to communications directly with the Board and/or its Counsel, rather than disseminating communications to or engaging with the community at large regarding my feelings outlined above.

18. I did so because I cannot tell whether the Board would treat them as “incivility,” “hostile communications,” “demeaning” conduct, or part of a prohibited pattern under the Speech Policy, and seek to hold me or my mother accountable.

19. Specifically, between August 5 and today, I would have sought to engage the Community writ large directly on my concerns regarding the Board’s governance, including by direct mailings to interested Community members (i.e., those who spoke at the meeting) or online posts.

20. Should availability permit, I also intend to speak at the Board’s next meeting on October 7. I want to describe the Board’s performance in pointed terms, including pointedly making the case that the timing of the Speech Policy was not coincidental and instead suggests an

intent to influence the election, especially since it was enacted over vehement criticism and is plainly indefensible.

21. I will not do so while the Speech Policy is enforceable, because of the penalties it purports to authorize.

22. I cannot avoid the Speech Policy by moving the discussion to another forum. By its terms, it reaches communications in any form or medium, regardless of where they originate or are received. Complaint Ex. H ¶ 1(g).

23. I am also concerned that the Association will discipline my mother, or hold me responsible for her communications, under paragraphs 1(d) and 1(e) of the Speech Policy.

24. The Speech Policy authorizes fines and suspension of membership rights and privileges, including immediate suspension under paragraph 4(c) that remains in place until the Association confirms that a threat no longer exists. Complaint Ex. H ¶¶ 4(a), 4(c). The Enforcement and Fines Schedule that the Board tabled on August 5 proposed suspension of voting rights. Complaint Ex. F, PDF p. 23, § IV(1).

25. To my knowledge, the Association has not yet charged me or my mother with a violation of the Speech Policy.

Timing of this Application

26. This Application is made after I sought to exhaust all non-judicial remedies, in an effort to save the Association (and, presumably, Community members) time and money.

27. Specifically, between August 9 and September 8, Mr. Polulak and I exchanged numerous emails in an attempt to resolve my concerns.

28. It was not until September 14 that Mr. Hasko stepped in and indicated that the Board would not withdraw the Speech Policy and would instead notify its insurance carrier of the possibility of litigation.

29. On September 22, I provided Mr. Hasko, Mr. Polulak, and the full Board a copy of the draft complaint, and gave a deadline of Monday, September 28, to withdraw the Speech Policy.

30. On September 25, Mr. Polulak indicated that the Board would not withdraw the policy.

31. I therefore filed the operative complaint on September 28, as promised.

32. Interim relief is urgent because the next opportunity to address the Board is October 7, 2026, and free debate will be stifled if the Speech Policy remains in place.

Notice of this Application

33. On September 29, I notified Mr. Polulak, counsel for the Association, by email to address mpolulak@polulaklaw.com (the email address at which Mr. Polulak and I previously corresponded) that I would present an order to show cause with temporary restraints to the Court on September 29. I provided him copies of the Complaint, this certification, the proposed order, and my brief. Mr. Polulak confirmed receipt on September 30. A copy of this email exchange is attached as exhibit J.

34. No prior application has been made for the relief requested in this application.

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.

Dated: September 30, 2026

/s/ Jeremy M. Glapion
Jeremy M. Glapion