

**Michael J. DeBlis III, Esq.**  
6 Highfield Road  
Bloomfield, NJ 07003  
Attorney for the Plaintiff Alice Kramden

---

**ALICE KRAMDEN,**

Plaintiff,

SUPERIOR COURT OF NEW  
JERSEY CHANCERY DIVISION:  
FAMILY PART OCEAN COUNTY

DOCKET NO.: FM-19-000-06

CIVIL ACTION

**COMPLAINT FOR DIVORCE**

v.

**RALPH KRAMDEN,**

Defendant

The plaintiff, **ALICE KRAMDEN**, residing at 116 N. Plainfield Avenue, Brick Township, County of Ocean, and State of New Jersey, by way of Complaint for Divorce, says:

**I. FIRST COUNT**

1. The plaintiff was lawfully married to the defendant, Ralph Kramden, in a religious ceremony on June 14, 1999 at the St. Dennis Roman Catholic Church in Hamden, CT.
2. The plaintiff was a *bona fide* resident of the State of New Jersey when this cause of action arose, and ever since and for more than one year next preceding the commencement of this action continued to be such a *bona fide* resident. Said cause of action arose while the plaintiff resided in Brick Township, Ocean County, New Jersey.

3. The defendant, Ralph Kramden, currently resides at 69 E. New Hampshire Drive (Apartment # 3), Brick Township, County of Ocean, and State of New Jersey.
4. When the cause of action for divorce of defendant arose, Mr. Kramden resided at 69 E. New Hampshire Drive (Apartment # 3), Brick Township, County of Ocean, and State of New Jersey.
5. The defendant has perpetrated acts of extreme mental cruelty against the plaintiff which in the past and present both endanger her health and make it improper and unreasonable for the plaintiff to cohabit with the defendant under the same roof. These acts commenced on April 15, 2004 and continued until December 15, 2006 when the plaintiff was forced to separate from the defendant on account of his extreme cruelty. Annexed hereto as Schedule A is a list of the acts of extreme cruelty.
6. More than three months have elapsed since the last act of extreme cruelty complained of as constituting the plaintiff's cause of action herein. The acts of extreme cruelty committed by the defendant within the period of three months before the filing of this Complaint, as set forth in Schedule A, are alleged not as constituting in whole or in part the cause of action set forth herein, but as relating back to qualify and characterize the acts constituting said cause of action.
7. One child was born of the marriage and resides with the plaintiff: Trixie Kramden, d.o.b. September 23, 2001, age 5. The child is in the custody and the control of the plaintiff.
8. During the marriage, the parties acquired by deed the real property located at 116 N. Plainfield Avenue, Brick Township, County of Ocean, and State of New Jersey. The parties also acquired personal property. Both the real property and the personal property are subject to equitable distribution.
9. There have been no prior proceedings between the parties involving the marriage or support for either party.

**WHEREFORE**, the plaintiff demands Judgment as to the First Count:

- A. Dissolving the marriage between the parties pursuant to N.J.S.A. 2A:34-2;
- B. For joint legal custody and shared physical custody of Trixie Kramden pursuant to N.J.S.A. 9:2-4;
- C. Requiring defendant to provide alimony and child support;
- D. Equitably distributing all real and personal property and all marital debts legally and beneficially acquired or incurred by the parties or either of them during the marriage

pursuant to N.J.S.A. 2A:34-23.1;

E. Directing the defendant to pay the plaintiff's counsel fees and costs pursuant to N.J.S.A. 2A:34-23; and

F. For such further relief as the Court may deem just and equitable under the circumstances.

## **II. SECOND COUNT**

1. The plaintiff, **ALICE KRAMDEN**, repeats each and every allegation of the First Count of the Complaint as if set forth at length herein.
2. The defendant committed adultery by having an extramarital affair with a co-worker, Shirley Wilson.
3. On December 7, 2006, the plaintiff arrived home earlier than usual from work. As she was pulling into the driveway, she saw a woman leaving from the side entrance of her home. Although the plaintiff thought that it was odd, she decided not to say anything.
4. On December 15, 2006, the plaintiff returned home from work to discover the same woman in bed with the defendant. Upon seeing the plaintiff, the woman jumped out of bed, hastily dressed, and ran from the home. The defendant told the plaintiff that the woman was an architect in his firm. The defendant begged the plaintiff for forgiveness and said that it was a "one-time thing" and "would never happen again."

**WHEREFORE**, the plaintiff demands Judgment as to the Second Count:

A. Dissolving the marriage between the parties pursuant to N.J.S.A. 2A:34-2;

B. For joint legal custody and shared physical custody of Trixie Kramden pursuant to N.J.S.A. 9:2-4;

C. Requiring defendant to provide alimony and child support;

D. Equitably distributing all real and personal property and all marital debts legally and beneficially acquired or incurred by the parties or either of them during the marriage pursuant to N.J.S.A. 2A:34-23.1;

E. Directing the defendant to pay the plaintiff's counsel fees and costs pursuant to N.J.S.A. 2A:34-23; and

F. For such further relief as the Court may deem just and equitable under the circumstances.

### III. THIRD COUNT

1. The plaintiff, **ALICE KRAMDEN**, repeats each and every allegation contained in the First and Second Counts of the Complaint as if set forth at length herein.
2. The defendant has habitually been consuming illegal drugs.
3. The plaintiff noticed that the defendant's behavior had become increasingly more erratic right around the time when she discovered that excessive amounts of money had been withdrawn from the joint savings account. The implication is that the defendant was squandering money from the couple's joint savings account – without the plaintiff's consent – to purchase illegal drugs. This is supported by the fact that the plaintiff discovered a vial of white powder in the defendant's briefcase.
4. The plaintiff has suffered extreme mental and physical cruelty as a result of the defendant's drug addiction. On one occasion, the defendant "took a swing" at the plaintiff. On other occasions, the defendant would be very calm, then disappear for a while, and return very agitated and argumentative.
5. Although the length of time that the defendant has been doing drugs is unknown, the fact remains that the defendant's association with drugs has been sufficiently persistent and substantial to undermine and destroy the basic precepts on which a marriage is founded: love, respect, and fidelity. Indeed, the plaintiff lives in constant fear of the defendant.

**WHEREFORE**, the plaintiff demands Judgment as to the Third Count:

- A. Dissolving the marriage between the parties pursuant to N.J.S.A. 2A:34-2;
- B. For joint legal custody and shared physical custody of Trixie Kramden pursuant to N.J.S.A. 9:2-4;
- C. Requiring defendant to provide alimony and child support;
- D. Equitably distributing all real and personal property and all marital debts legally and beneficially acquired or incurred by the parties or either of them during the marriage pursuant to N.J.S.A. 2A:34-23.1;

E. Directing the defendant to pay the plaintiff's counsel fees and costs pursuant to N.J.S.A. 2A:34-23; and

F. For such further relief as the Court may deem just and equitable under the circumstances.

#### IV. FOURTH COUNT

1. The plaintiff, **ALICE KRAMDEN**, repeats each and every allegation contained in the First, Second, and Third Count of the Complaint as if set forth at length herein.
2. The defendant has constructively deserted the plaintiff by willfully refusing to engage in sexual relations with the plaintiff commencing December 24, 2004 and continuing to the present time.

**WHEREFORE**, the plaintiff demands Judgment as to the Fourth Count:

A. Dissolving the marriage between the parties pursuant to N.J.S.A. 2A:34-2;

B. For joint legal custody and shared physical custody of Trixie Kramden pursuant to N.J.S.A. 9:2-4;

C. Requiring defendant to provide alimony and child support;

D. Equitably distributing all real and personal property and all marital debts legally and beneficially acquired or incurred by the parties or either of them during the marriage pursuant to N.J.S.A. 2A:34-23.1;

E. Directing the defendant to pay the plaintiff's counsel fees and costs pursuant to N.J.S.A. 2A:34-23; and

F. For such further relief as the Court may deem just and equitable under the circumstances.

Michael De Blis III, Esq.  
Attorney for Plaintiff

Dated: April 26, 2007

## Schedule A: Extreme Mental and Physical Cruelty

### A. Mental Cruelty

- (i) On or around April 15, 2004, the defendant demanded that the plaintiff obtain summer employment. The defendant's insistence that the plaintiff get a summer job surprised the plaintiff because: (1) the defendant – in the early years of the marriage – understood the plaintiff's desire to stay home and take care of the house and the child during the summer; (2) the defendant had received a raise in 2004 which assured the couple that they would not have to worry about money during the summer; and (3) part-time employment would barely cover child care costs, let alone contribute to the couple's disposable income. In order to placate the defendant, the plaintiff obtained a part-time job as a waitress in a restaurant. However, the defendant still remained disgruntled. As a result, the plaintiff suffered mental anguish.
- (ii) On September 15, 2006, the plaintiff noticed that the defendant had withdrawn a couple of thousand dollars from the joint savings account. When she asked the defendant about the withdrawal, he became defensive and responded, "it's none of your damned business!" As a result of the defendant's curt response, the plaintiff reviewed old statements from the joint savings account only to find that the defendant had withdrawn many thousands of dollars over a period of a year-and-a-half. These circumstances left the plaintiff feeling as though she could no longer trust the defendant.
- (iii) *Adultery as an act of cruelty*: On December 7, 2006, the plaintiff arrived home earlier than usual from work. As she was pulling into the driveway, she saw a woman leaving from the side entrance of her home. Although the plaintiff thought that it was odd, she decided not to say anything. However, on December 15, 2006, the plaintiff returned home from work to discover the same woman in bed with the defendant.

### B. Physical Cruelty

- (iv) When the plaintiff asked the defendant to explain the disappearance of thousands of dollars from the joint savings account on September of 22, 2006, the defendant repeated his earlier response and "took a swing" at the plaintiff. Fortunately, the plaintiff had quick reflexes and was able to avoid being hit. This has made the plaintiff fearful of future confrontations with the defendant where she may not be as lucky.

**CERTIFICATION PURSUANT TO R. 4:5-1(b)(2)**

I, Alice Kramden, residing at 116 N. Plainfield Ave., Brick Township, Ocean County, New Jersey certify that to the best of my information, knowledge, and belief that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding, that no other action or arbitration proceeding is contemplated, and I am not aware of any other person who should be joined in this matter.

**TRIAL COUNSEL DESIGNATION PURSUANT TO R. 4:5-1(C)**

Michael De Blis III, Esq. is hereby designated trial counsel in this matter.

By: \_\_\_\_\_  
Michael De Blis III, Esq.

Dated: April 26, 2007

**CERTIFICATION OF VERIFICATION AND NON-COLLUSION PURSUANT  
TO R. 5:4-2(C)**

I, **ALICE KRAMDEN**, being of full age, hereby certify:

I am the plaintiff in the foregoing Complaint for Divorce. All of the allegations contained in this Complaint are true to the best of my knowledge, information and belief. The Complaint is made in truth and in good faith and without collusion for the causes set forth in it. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Alice Kramden  
Plaintiff

Dated: April 26, 2007