



PRIVATE CRIMINAL COMPLAINT

COMMONWEALTH OF PENNSYLVANIA VS.

DEFENDANT: NAME and ADDRESS

Governor Joshua Shapiro
508 Main Capitol Building
Harrisburg, Pa 17120

(Fill in defendant's name and address)

Magisterial District Number:
MDJ Name: Hon.
Address:
Telephone:

Docket No:
Date Filed:
OTN:

(Above to be completed by court personnel)

Notice: Under Pa.R.Crim.P. 506, your complaint may require approval by the attorney for the Commonwealth before it can be accepted by the magisterial district court. If the attorney for the Commonwealth disapproves your complaint, you may petition the court of common pleas for review of the decision of the attorney for the Commonwealth.

Fill in as much information as you have.

Table with columns: Defendant's Race/Ethnicity, Defendant's Sex, Defendant's D.O.B., Defendant's A.K.A. (also known as), and Defendant's Vehicle Information (Plate Number, State, Registration Sticker).

I, \_\_\_\_\_
(Name of Complainant-Please Print or Type)

do hereby state: (check appropriate box)

- 1. [X] I accuse the above named defendant who lives at the address set forth above
[ ] I accuse the defendant whose name is unknown to me but who is described as \_\_\_\_\_
[ ] I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe.

with violating the penal laws of the Commonwealth of Pennsylvania at 625 Evans City Rd, Butler, PA 16001
(Place-Political Subdivision)

in Butler County on or about July 13, 2024

Participants were: (if there were participants, place their names here, repeating the name of the above defendant)

Governor Joshua Shapiro and other unnamed conspirators.



Defendant's Name: Joshua Shapiro  
Docket Number:



# PRIVATE CRIMINAL COMPLAINT

2. The acts committed by the accused were:  
(Set forth a summary of the facts sufficient to advise the defendant of the nature of the offense charged. A citation to the statute allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section and subsection of the statute or ordinance allegedly violated.)  
See attached Affidavit.

All of which were against the peace and dignity of the Commonwealth of Pennsylvania and contrary to the Act of Assembly, or in violation of 25 and 901, 902, 903 and a.b.c  
(Section) (Subsection)  
of the 18  
(PA Statute)

- 3. I ask that process be issued and that the defendant be required to answer the charges I have made.
- 4. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

July 23, 2024  
Date

*Hadassah July*  
Signature of Complainant

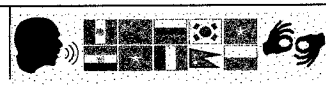
Office of the Attorney for the Commonwealth  Approved  Disapproved because \_\_\_\_\_

\_\_\_\_\_  
(Name of Attorney for Commonwealth-Please Print or Type) (Signature of Attorney for Commonwealth) (Date)

AND NOW, on this date \_\_\_\_\_, I certify that the complaint has been properly completed and verified.

\_\_\_\_\_  
(Magisterial District) (Issuing Authority)

## SEAL



## Affidavit

I, Hadassah Feinberg, aka Affiant, hereby charge Governor Joshua Shapiro, in his personal, individual and official capacity, with murder and attempted murder. Governor Joshua Shapiro conspired with multiple parties to act on the political scheme and carry out the attempted assassination of Former President Donald J. Trump, by and through an abuse of power both directly and indirectly in the State of Pennsylvania.

Governor Joshua Shapiro through the executive branch, enforced, conspired, and carried out the attempted assassination on Former President Donald J. Trump, because he knew that President Joseph R. Biden would be an unsuccessful presidential democratic nominee running against Former President Donald J. Trump.

In the weeks leading up to the Trump Rally, President Joseph R. Biden, made frequent visits to Governor Joshua Shapiro to discuss the obstacle faced by the Democratic party. Governor Joshua Shapiro, organized, schemed, and conspired with or without President Joseph R. Biden, the premeditated plan to carry out the attempted assassination against Former President Donald J. Trump.

Governor Joshua Shapiro is guilty and liable for the attempted assassination along with crimes against the Affiant's family, Greenberg family, Peterson family, Daniel Harris, Jarrod Tutko, Iris Mummert, Yvonne Worski-Worman, Elena Belegolovsky, Smith Children, Matt Kanapesky, Mindy Kell, Rogette Harris, and hundreds of victims across the state of Pennsylvania who exposed public corruption in the State of Pennsylvania.

Governor Joshua Shapiro abused his power as governor to conspire with local and state law enforcement officials and has actively failed to protect hundreds of victims

across the state as referenced in the Rico Lawsuit lodged in the Maryland District Court on July 3, 2023, both named, and unnamed, see *Feinberg v Cintron*, U.S. Dist. Ct. Md. 1:24-cv-01957.

Governor Joshua Shapiro failed to ensure that the Pennsylvania State Police under his supervision would clear the event prior to the rally and intentionally failed to ensure the safety of the Former President Donald J. Trump due to his modus operandi with the assistance of unnamed local and state law enforcement officials and monetary donors including George Soros, Black Rock, President Joseph R. Biden, both intentionally and unintentionally.

Governor Joshua Shapiro has been a suspect and perpetrator named in multiple private investigations and lawsuits for years for state and federal crimes and he has actively engaged in public corruption with the Philadelphia FBI office to obstruct investigations for the crimes reported. There are hundreds of reports at the FBI office against Governor Joshua Shapiro that have never been investigated, and this Affiant is a primary witness.

Governor Joshua Shapiro while acting by and through his modus operandi has engaged in proliferated actions to climb the political ladder to Vice President of the United States of America and or President of the United States of America, while engaging in multiple crimes and suppressing witness testimony from hundreds of innocent victims whose lives have been destroyed by his directives, retaliation, and executive administration.

Governor Joshua Shapiro has utilized the media, namely Penn Live and ABC news to promote his political position and disregard the crimes, as evidenced before the public. He

has committed tax fraud for years in his position as Commissioner, Attorney General, and Governor for the State of Pennsylvania. He has concealed murders, endangered children, and now engaged in a heinous crime under his authority and supervision.

Governor Joshua Shapiro, in his abuse of power has manipulated and willingly engaged in state and federal crimes for more than ten years against the Commonwealth citizens and other officials who expose his criminal acts.

I am hereby alleging that this Private Criminal Complaint against Governor Joshua Shapiro meets the criteria of a preponderance of the evidence, since it is more likely true than not, that Governor Joshua Shapiro acted through his modus operandi to climb the political ladder, influenced and caused the outcome of the attempted assassination on July 13, 2024, in Butler, Pennsylvania, both directly and indirectly against Former President Donald J. Trump, and should be charged accordingly with criminal homicide pursuant to 18 Pa. Cons. Stat § 25, for the senseless death of Corey Comperatore, and Criminal Attempt pursuant to 18 Pa. Cons. Stat § 901, for an attempted assassination against a Former President of the United States of America, Donald J. Trump. He should be charged with any additional criminal charges the District Attorney deems fit including Criminal Solicitation and Criminal Conspiracy pursuant to 18 Pa. Cons. Stat § 902 and §903 and should be removed from office immediately.

On July 5, 2024, a letter to Former President Donald J. Trump and President Joseph R. Biden was mailed regarding Shapiro's crimes and the public corruption across the State of Pennsylvania. The letter was mailed by the Affiant due to the severity of the crimes being

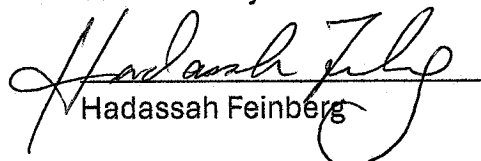
committed vastly across the State by officials under Governor Joshua Shapiro and Governor Joshua Shapiro.

On July 13, 2024, this Affiant contacted the Secret Service to provide a tip. On July 15, 2024-July 23, 2024, this Affiant communicated with Secret Service Agent John Donohue and provided numerous documentations related to the crimes committed by Governor Joshua Shapiro and the Philadelphia FBI's involvement in covering up the crimes of Governor Joshua Shapiro against numerous victims.

On March 9, 2024, Supervisory Special Agent Kenneth Keller, advised this Affiant through email that he contacted the FBI Philadelphia Personnel, FBI victim services, and management at the Washington Field office, and that they advised him to direct the Affiant to Philadelphia FBI. Agent Kenneth Keller informed this Affiant that the crimes being reported are not occurring in his jurisdiction, and that he has no jurisdiction to assist Pennsylvania victims. He advised the Affiant to contact the Department of Justice, who has made no contact with the Affiant regarding hundreds of reports from victims across the State of Pennsylvania.

I am requesting that additional charges be brought against Pennsylvania Governor Joshua Shapiro for crimes committed against innocent victims listed herein, and charges shall be brought against any other individuals known or unknown who conspired with Governor Joshua Shapiro to commit any state or federal crimes in Pennsylvania over the last 13 years.

Submitted by:

  
Hadassah Feinberg

Dated: July 23, 2024

Hadassah Feinberg  
Address Redacted  
(717) 571-7921  
h\_feinberg@yahoo.com

Department of Homeland Security  
U.S. Secret Service  
5200 Belfort Rd  
Jacksonville, Fl. 32256

cc: Former President Donald J. Trump  
1100 S. Ocean Blvd.  
Palm Beach, Florida 33480

**SEALED AND CONFIDENTIAL**

To whom this may concern:

July 16, 2024

My name is Hadassah Feinberg and I am a former resident of the State of Pennsylvania. On October 26, 2023, I fled Dauphin County, Pa. to Cumberland County, Pa. after my family was threatened for exposing county crimes unrelated to my family. I sold two homes and relocated for safety, hence, the redaction of my address. Please be advised that a letter was mailed to Former President Donald J. Trump on July 5, 2024, regarding public corruption in the State of Pennsylvania involving law enforcement and elected officials, see attached.

**BACKGROUND:**

I maintain a Bachelor of Science in criminal justice with an emphasis in forensic investigations. I was employed with the Pennsylvania State Police in 2015, and I have legal education from Widener Law School. I am an experienced foster and adoptive mother licensed by Dauphin County, Pennsylvania.

I attended a closed event at Governor Josh Shapiro's residence around September 2023, prior to witnessing the crimes committed by Governor Josh Shapiro and other officials. The Harrisburg Jewish community is fearful of speaking up due to the extent of their crimes and retaliatory tactics.

I was raised in the Harrisburg Jewish Community along with Ellen Greenberg (who was murdered on January 26, 2011). Her death was concealed by Josh Shapiro due to the childhood relationship and bribes made to his campaign by Samuel Goldberg (NBC) and James Schwartzman (Assistant U.S. Attorney).

I filed a private criminal complaint to Philadelphia District Attorney Larry Krasner earlier this month charging Samuel Goldberg with first degree murder. He is a renowned sports reporter with NBC.

I was also raised with Philip Wittlin's children (convicted felon for sexual abuse in the Jewish Harrisburg community). I saved Phillip Wittlin's grandchildren on October 12, 2023, which Shapiro is concealing due to his political agenda.

Although my investigation for the attempted assassination is still in its preliminary stages, I have overwhelming physical evidence to support the proposal that Josh Shapiro planned, organized, and indirectly carried out the attempted assassination because of his modus operandi. He has complete authoritative control in the State and can be compared to Johnny Dougherty, "untouchable."

Humans are creatures of habit and routine. Since President Joe Biden refused to resign, the only option for the Democratic party was to eliminate Former President Donald J. Trump. Joe Biden made numerous visits to meet Josh Shapiro preceding the attempted assassination.

On July 5, 2024, I mailed a letter to President Joe Biden informing him that I would leak and expose the Pennsylvania Official crimes and assist Trump if he failed to intervene, see attached.

To date, I have filed successful litigation against the officials both in state and federal court, but the matters are SEALED. I can provide you with all the docket numbers and thousands of pages of evidence. The President Judge of Dauphin County has recused his entire bench in response to my lawsuit, see attached. The officials engaged in mail fraud to delay my receipt of the Court order. I filed RICO claims against Pennsylvania officials in a Maryland court because of the organized crime in Pennsylvania. It has been assigned to the Chief Federal Judge docket number 1:24-cv-01957, see *Feinberg v. Cintron, et al.*

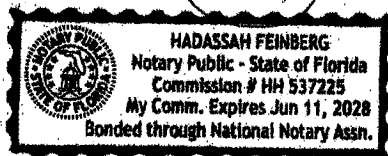
Wayne A. Jacobs, the director of the Philadelphia FBI office is a Defendant named in the lawsuit. He will NOT assist the Secret Service in the investigation of the attempted assassination of Trump, because he has a conflict of interest. I am prepared to testify before the Senate and Congress if necessary.

FAILURE:

Unintentionally, your agency relied on the intelligence and security of the Pennsylvania State Police without the prior knowledge of Shapiro's modus operandi and political gain. Moving forward, any independent investigation and security clearances you can conduct without the cooperation of the Pennsylvania State Police and local Pennsylvania Field Offices (FBI) would best protect the former president and bring justice to the heinous crime committed on July 14, 2024. I look forward to assisting you in these matters.

Kindly,

  
Hadassah Feinberg





Hadassah Feinberg  
P.O. Box 745  
Penney Farms, FL 32079  
(717) 571-7021  
h\_feinberg@yahoo.com

Former President Donald J. Trump  
1100 S. Ocean Blvd  
Palm Beach, Florida 33480

**SEALED AND CONFIDENTIAL**

To the Honorable Former President Donald J. Trump:

July 5, 2024

This letter is to be sealed and confidential as it contains the names of numerous victims at risk of retaliation.

My name is Hadassah Feinberg, and I am a former licensed foster and adoptive mother from the State of Pennsylvania. I have a Bachelor of Science in criminal justice, and I have legal experience from Widener Law School.

I began advocating for Pennsylvania victims in October 2023, after I was forced to flee with my four children from our home due to retaliation from county officials. I exposed evidence of crimes they committed against four unrelated children, and as a result they retaliated by attempting to traffic my children.

They were unsuccessful in their attempts, and my children were returned by another county after I fled my home. Once I increased my publicity with the community, I started to learn about hundreds of other victims facing the same corruption.

In 2011, Ellen Greenberg was murdered by Samuel Goldberg in a conspiracy which was covered up by James Schwartzman, Sam's uncle. The Federal Bureau of Investigation was informed of the murder and disregarded it. Schwartzman was part of the Ethics board in Pennsylvania and has made large contributions to Governor Josh Shapiro's campaign.

Daniel Harris was incarcerated fraudulently by Governor Shapiro and DA Francis Chardo who withheld evidence during trial, which is a Brady violation. They provided no DNA linking him to the crime scene and bribed two drug addicts to testify against him. He has been incarcerated for twelve years.

Francis Chardo tampered with physical evidence against my family and the Smith children who were abandoned for more than 12 hours by their biological mother, Marcie Gail Smith, on October 12, 2023. Her father, Phillip Wittlin was a convicted pedophile in the Jewish Community where I grew up.

**Francis Charo and Josh Shapiro have full control over the Pennsylvania State and local police, and they refuse to investigate any crimes committed by the State actors. I made numerous attempts to work with Charo, but he is failing his duty as district attorney, sworn to protect the public.**

**On 6/28/2024, the Dauphin County Court of Common Pleas fired Rogette Harris, Bridget Whitley, and Cole Goodman for obstructing justice of crimes reported and concealing crimes committed by Francis Charo.**

**The Pennsylvania Supreme Court has issued a legal State of Emergency for Dauphin County Pennsylvania Court of Common Pleas. The crimes being committed in the State of Pennsylvania are part of a large trafficking ring run by Senator Bob Casey and Governor Josh Shapiro. Every citizen of Pennsylvania is at the mercy of this white-collar trafficking ring that has been ongoing for over 13 years. The Federal Bureau of Investigation has completely disregarded the claims of hundreds of victims.**

**The officials maintain control by backing each other up, withholding open records requests, and dismissing all cases that name them as Defendants. Anna M. Ciardi, from the Pa Disciplinary Board is part of the trafficking ring and refuses to investigate hundreds of complaints filed to the court.**

**I have multiple lawsuits against the officials in and out of Pennsylvania for crimes committed under the Federal Racketeer Act. This is primarily a democratic scheme, and I believe if you leak this information, it will help you gain popularity in the upcoming election. It will also assist you in gaining the public's respect, as the community is left with no other remedies.**

**The following, are just a few families of the top victims I have prioritized advocating for:**

**Feinberg children  
Ellen Greenberg  
Jarrod Tutko  
Yvonne Wolski-Worman  
Elena Belegolovsky  
Smith children  
Iris Mummert  
Jon Walsh  
David Thurston  
Daniel Harris  
Autumn Meyers  
Matthew and Carolyn Peterson**

**I have access to over 1,000 pages of physical evidence and audio testimony from law enforcement. I will not stop fighting until justice is served.**

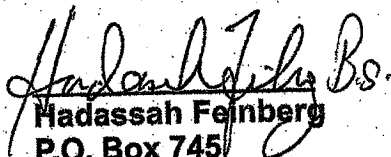
**I am contacting you because I believe that as Former President of the United States and current Republican Presidential Nominee you have the authority and duty to intervene and investigate at a much higher level of office.**

**The Federal Bureau of Investigation located in Philadelphia, Pa. refuses to investigate crimes against hundreds of victims committed by state actors. It's horrific and utterly disgraceful.**

**Since Pennsylvania is a swing state, I know this will play a big role for your cabinet and candidacy. I look forward to working with you in pursuit of justice and protection for the residents of Pennsylvania.**

**As this matter rises in the public eye, you can gain the public's support by assisting the public. You may access all my court filings on my public Facebook page titled, "SPEAK UP".**

**Respectfully,**

  
**Hadassah Feinberg  
P.O. Box 745  
Penney Farms, FL 32079  
(717) 571-7021  
h\_feinberg@yahoo.com**

**SEALED AND CONFIDENTIAL**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**HADASSAH FEINBERG,**

**Plaintiff,**


**v.**

**FERDINAND CINTRON, JR., JOSH SHAPIRO, FRANCIS CHARDO, COLIN ZWALLY, SCOTT SMITH, MICHELLE AVERY, EMILY HOFFMAN, JOSHUA YOUNG, JEFF ENDERS, STEPHEN LIBHART, SALLY LUPINI, ERIKA MARTEL, CARRIE SELF, GABI WILLIAMS, VALERIE ARKOOSH, VINCENT PAESE, ADAM YOUNG, LAVAL MILLER-WILSON, ANDREA BANKES, LARRY KRASNER, COREY DICKERSON, ANDREW BATH, LEE ANN TARASI, CHRISTIAN RIBEC, ROBERT MARTIN, MARCIE SMITH, ERIC SMITH, ROSA CRUZ, MANDJOU SYLLA, JULIE REIS, JOSHUA APPLEBY, CURRIN HAINES-YODER, KATHRYN CROWELL, KENNY YOUNG, KIM DEIBLER, MARISA MCCLELLAN, NOELLE BARRETT, GEORGE P. HARTWICK, III., ALYSSA SCHATZ, ANDREA MARTIN, ALLISON VAJDIC, SEAN MCCORMACK, TAMARA B. WILLIS, LISA WHEELER, JOHN F. CHERRY, WAYNE A. JACOBS, MICHAEL PALERMO, JOHN J. MCNALLY, MATTHEW P. SMITH, KIMBERLY KARDELIS, SAM GOLDBERG, EDWARD E. GUIDO, BRIDGET WHITLEY, BRAD WINNICK, JAMES SCHWARTZMAN, SETH**

**CIVIL CASE NO. GLR 24 CV 1957**

FILED  ENTERED  
 LOGGED  RECEIVED

**JUL 03 2024**

BY  **AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND** DEPUTY

**JURY TRIAL DEMANDED**

**ELECTRONIC FILING**

WILLIAMS, BRIAN WOLFE, MARLON  
OSBOURNE, PAIGE KULSA,  
BRYAN R. HENNEMAN, ROGETTE  
HARRIS, AMANDA OZENBAUGH,  
STEPHEN OLSZEWSKI, TOM  
MCGARRITY, THOMAS CARTER,  
AND ANNA M. CIARDI, et al.

Defendants,

**COMPLAINT FOR VIOLATION OF CRIMES DEFINED BY THE  
FEDERAL RACKETEER INFLUENCED AND CORRUPT  
ORGANIZATIONS ACT ("RICO") FOR INJUNCTION, COMPENSATORY  
AND NOMINAL RELIEF**

AND NOW comes Plaintiff, aka "Hadassah Feinberg", *pro se*, and states the following claims for relief for the violation and offense of THE FEDERAL (RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS) ACT, 18 U.S.C. §§ 19961-68 for the said accused, Ferdinand Cintron, Josh Shapiro, Francis Chardo, Colin Zwally, Michelle Avery, Emily Hoffman, Joshua Young, Jeff Enders, Stephen Libhart, Sally Lupini, Carrie Self, Gabi Williams, Valerie Arkoosh, Vincent Paese, Laval Miller-Wilson, Andrea Bankes, Corey Dickerson, Andrew Bath, Christian Ribec, Adam Young, Lee Ann Tarasi, Robert Martin, Marcie Smith, Eric Smith, Rosa Cruz, Mandjou Sylla, Joshua Appleby, Alyssa Schatz, Kathryn Crowell, Kenny Young, Tom McGarrity, Thomas Carter, Marisa McClellan, Kim Deibler, Scott Smith, Lisa Wheeler, Noelle Barrett, Allison Vajdic, Amanda Ozenbaugh, George P. Hartwick, III., Julie Reis, Currin Haines-

Yoder, Andrea Martin, Sean McCormack, Tamara B. Willis, Erika Martel, Michael Palermo, John F. Cherry, John J. McNally, Matthew P. Smith, Kimberley Kardellis, Edward E. Guido, Wayne A. Jacobs, Bridget Whitley, Brad Winnick, Sam Goldberg, James Schwartzman, Seth Williams, Larry Krasner, Marlon Osbourne, and Stephen Olszewski individually and as persons concerned in the commission of a crime, and together with co-conspirators, in Baltimore City, and the State of Maryland, and Counties of Dauphin and Montgomery, in the State of Pennsylvania, on and between the 26th day of January 2011 and the 4th day of June 2024, while associated with an enterprise, unlawfully conspired and endeavored to conduct and participate in, directly and indirectly, such enterprise through a pattern of racketeering activity in violation of 18 U.S.C. §§ 19961-68, as described below and incorporated by reference as if fully set forth herein, contrary to state and federal laws of said State, the good order, peace, and dignity thereof,

### **INTRODUCTION**

1. On October 22, 2023, Defendant Ferdinand Citron, a Law Enforcement Officer for Baltimore City Police Department received a report that Plaintiff and her four minor children were being harassed, intimidated, and threatened in and out of their home, county, and state by way of

intimidation, and retaliation between October 18, 2023, through October 22, 2023. The Defendant failed to file a police report and respond to the address and location where the Plaintiff and her children were seeking refuge. The Defendant failed to protect the Plaintiff and her children by way of his moral, ethical, civic, and sworn official duties to intervene in, document, and assist the Plaintiff based on allegations raised. He resides in Maryland and therefore jurisdiction is established in the State of Maryland.

2. Defendant Josh Shapiro failed his duties as governor to protect and intervene with Plaintiff and her four minor children who were being harassed, intimidated, and threatened in and out of their home, county, and state by way of intimidation, and retaliation between October 18, 2023, through June 4, 2024. The Defendant failed to protect the Plaintiff which violated his moral, ethical, civic, and sworn official duties to assist the public with crimes and misconduct being committed by state actors in his jurisdiction. Defendant Josh Shapiro is active Governor for the State of Pennsylvania.

3. Defendants Josh Shapiro, Stephen Olszewski, Seth Williams, Larry Krasner, and Marlon Osbourne who are residents of Florida and Pennsylvania, mostly high-ranking officials and medical examiners, were

informed and had access to physical evidence suggesting that Ellen Greenberg was murdered, stabbed, and strangled, on January 26, 2011, in her apartment. Based on inconsistent reports from her fiancé, Sam Goldberg, and based on the evidence obtained from witnesses, the autopsy, and process of elimination, probable cause was readily accessible and evident to conclude that murder was committed by Sam Goldberg and that his uncle James Schwartzman, who he contacted prior to calling 911, conspired with his nephew to destroy evidence on Ellen Greenberg's electronics before the police could investigate the crime scene.

4. Defendant Goldberg and Defendant Shapiro grew up together in the Jewish Community and went to the same school. It was apparent on its face that Defendant Goldberg obstructed justice, and gave suggestive reports to emergency personnel, to manipulate the outcome of the crime. The Defendants failed to prosecute, investigate, and disclose evidence to the Greenberg family, who's elderly parents have spent nearly a decade and \$500,000, just to get the city of Philadelphia to transfer back their daughters cause of death from a suicide to a homicide so it can be properly investigated. Defendant Shapiro when confronted with the Greenberg's in 2023, rejected their attempts to communicate. The Pennsylvania State



Police assisted the Defendant in barring the parents from approaching. In addition, Defendant Shapiro unethically and knowingly accepted monetary donations to his campaign by Defendant Goldberg's family, solidifying a conflict of interest and illegal bribe. Defendant Shapiro has failed hundreds of victims to protect the Enterprise and Racket. He was acting Attorney General between 2017-2023 and delayed justice by disregarding the case and sending it back and forth to the District Attorney's office for four years. He was also Commissioner in Montgomery County between 2012-2017 around the date of the stabbing and had relationships with Rufus Seth Williams who was District Attorney at the time.

5. Defendant Williams commits ongoing RICO crimes and has already been convicted for unrelated offenses and sentenced to five years in prison for a bribery charge. Plaintiff contacted Defendant Williams in May 2024, at which time he became notably defensive and threatened to sue the Plaintiff with defamation if she brought a claim against him for organized crime. He also deleted portions of communications on twitter with the Plaintiff, and unfollowed other victims who have connections to the Plaintiff. Defendant Williams had a clear and underlying duty to prosecute Defendant Goldberg and Defendant Schwartzman for conspiracy to conceal and obstruct the murder of Ellen Greenberg. He intentionally failed

to prosecute them for financial gain and their official capacities in the State of Pennsylvania and there is probable cause to conclude that he accepted bribes from them like he did with the other charges he was sentenced for. He too is dedicated to maintaining the Enterprise.

6. Defendant Larry Krasner was private counsel for the Greenberg family after Ellen Greenberg's murder and therefore had a fiduciary duty to legally advise them and inform them of the corruption being committed by the high-ranking officials he had worked with. By bidding for and accepting the position as Philadelphia District Attorney he engaged in activities that contradicted his fiduciary duties to the Greenberg's. He is active District Attorney for Philadelphia, Pennsylvania. He is maintaining silence to ensure that the Enterprise is continued. Defendant Marlon Osbourne was Medical Examiner for Philadelphia during the investigation of Ellen Greenberg's murder. He originally deemed Ellen Greenberg's death a homicide but after meeting with high-ranking government officials on February 28, 2011, he knowingly changed it to a suicide, either by extortion, or bribe on April 4, 2011. He left the State of Pennsylvania in 2014 and now resides in Florida. This case is multi-jurisdictional because all the Defendants are spread out in different states. Defendant Stephen Olszewski, an investigator with the Philadelphia Medical Examiners Office,

intentionally obstructed justice and omitted pertinent facts in the autopsy to alter the outcome of the investigation against Defendant Goldberg. It is noted in the Memorandum Opinion filed on September 13, 2023, in the Commonwealth Court of Pennsylvania. There are three active cases in the Pennsylvania Commonwealth Court. The Defendants preliminary objections have been dismissed as moot.

7. Defendant Shapiro was informed by a Grand Jury that Jarrod Tutko's death on August 1, 2014, was a preventable fatality and was a direct result of negligence by Defendant's listed herein. Defendant Shapiro intentionally failed to bring charges of child endangerment and prosecute the county Defendants in efforts to obstruct justice and protect his colleagues from prosecution despite his sworn duties and oath to the public. Defendant Josh Shapiro was acting Attorney General between 2017-2023.

8. Defendant John F. Cherry, along with other Defendants herein extorted by way of threats and false statements and permanently removed the custody of Matthew and Carolyn Peterson's six adopted children in 2019. He threatened to incarcerate them if they exposed the crimes committed by some of the Defendants including Defendant Lee Ann Tarasi. Defendant Tarasi also conspired with the same Defendants to obstruct

justice against the Plaintiff. Defendant John F. Cherry was the President Judge for the Dauphin County Court of Common Pleas until 2024. At this time there is a lawsuit against the President Judge of the Dauphin County Court of Common Pleas for willfully engaging in misconduct and authorizing the Enterprise to continue its existence.

9. Defendant Ferdinand Cintron, a Maryland resident, and the other Defendants charged in this lawsuit failed their ethical, professional, civic, and sworn official duties to protect the public, and deliver justice and they knowingly and willfully joined a conspiracy to unlawfully obstruct justice, conceal evidence, and delay justice for the Plaintiff and her children, the Smith children, Ellen Greenberg, Jarrod Tutko, Matthew and Carolyn Peterson, Daniel Harris, and unknown others. That conspiracy contained a common plan and purpose to commit two or more acts of racketeering activity in Baltimore City, Maryland, Dauphin and Montgomery County, Pennsylvania, and elsewhere in the State of Maryland and the State of Pennsylvania.

#### **THE ENTERPRISE**

10. At all times relevant to this Court of the lawsuit, the Defendants, as well as others not named as Defendants, unlawfully conspired and endeavored to conduct and participate in a criminal enterprise in Baltimore

City, Maryland, Dauphin County, and Montgomery County, Pennsylvania, and elsewhere. Defendants Ferdinand Cintron, Josh Shapiro, Francis Chardo, Colin Zwally, Michelle Avery, Emily Hoffman, Joshua Young, Jeff Enders, Stephen Libhart, Sally Lupini, Carrie Self, Gabi Williams, Valerie Arkoosh, Vincent Paese, Laval Miller-Wilson, Andrea Bankes, Corey Dickerson, Andrew Bath, Christian Ribec, Adam Young (aka AJ Young), Lee Ann Tarasi, Robert Martin, Marcie Smith, Eric Smith, Rosa Cruz, Mandjou Sylla, Joshua Appleby, Alyssa Schatz, Kathryn Crowell, Kenny Young, Tom McGarrity, Thomas Carter, Marisa McClellan, Kim Deibler, Scott Smith, Lisa Wheeler, Noelle Barrett, Allison Vajdic, Amanda Ozenbaugh, George P. Hartwick III, Julie Rejs, Currin Haines-Yoder, Andrea Martin, Sean McCormack, Tamara B. Willis, Erika Martel, Michael Palermo, John F. Cherry, John J. McNally, Deborah Smyre, Matthew P. Smith, Kimberley Kardelis, Edward E. Guido, Wayne A. Jacobs, Bridget Whitley, Brad Winnick, Sam Goldberg, James Schwartzman, Seth Williams, Larry Krasner, Marlon Osbourne, and Stephen Olszewski co-conspirators Individual 1 through Individual 65, and others known and unknown to the Plaintiff, constituted a criminal organization whose members and associates engaged in various related criminal activities including, but not limited to, corruption, obstruction of justice, extortion,

bribery, kidnapping, influencing witnesses, intimidation of a witness, conspiracy to defraud the state, acts involving theft, and perjury.

11. This criminal organization constituted an enterprise as that term is defined in 18 U.S.C. §§ 19961-68, that is, a group of individuals associated in fact. The Defendants and other members and associates of the enterprise had connections and relationships with one another and with the enterprise. The enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise operated in Baltimore City, Maryland, Dauphin, and Montgomery County, Pennsylvania, and elsewhere in the State of Pennsylvania. The enterprise operated for a period, sufficient to permit its members and associates to pursue its objectives. In total, the enterprise operated for a minimum of 14 years.

**MANNER AND METHODS OF THE ENTERPRISE**

12. The manner and methods used by the Defendants and other members and associates of the enterprise to further the goals of the enterprise and to achieve its purposes included, but were not limited to, the following:

**Corruption**

13. Members of the enterprise, including several of the Defendants, appeared at hearings in Dauphin and Cumberland County, Pennsylvania, before Judges of the Cumberland County and Dauphin County Court of Common Pleas on November 6, 2023, and November 8, 2023. At these hearings, members of the enterprise made false statements concerning child abuse of the Feinberg children and welfare of the Smith children at UPMC Hospital. The purpose of these false statements was to persuade the Court of Common Pleas to adjudicate the Feinberg children as retaliation for the Petitioners exposure of their crimes against the Smith children and maintain their high-ranking capacities and income.

14. Members of the enterprise corruptly solicited local, state, and federal law enforcement officers in Maryland, Virginia, and Pennsylvania to assist them with the purpose of concealing the crimes exposed by the Petitioner. Members of the enterprise also made false statements to state legislators and federal law enforcement officers during meetings from January 26, 2011, through May 15, 2024.

15. Members of the enterprise, including several of the Defendants, appeared at hearings in Dauphin County, Pennsylvania, before Judges of the Dauphin County Court of Common Pleas around 2019. At these hearings, members of the enterprise made false statements concerning

child abuse of the Peterson children. The six Peterson children were Adjudicated Dependent even though Matthew and Carolyn Peterson were never convicted of crimes. The Defendants extorted the Petersons to prevent exposure of their corrupt actions. The purpose of the outcome was to conceal the corrupt actions of the Defendants and maintain their high-ranking capacities and income.

16. Members of the enterprise, including several of the Defendants, appeared at hearings in Montgomery County, Pennsylvania, before Judges of the Appellate and Court of Common Pleas around between 2011 through 2023. At these hearings, members of the enterprise made arguments to obstruct and delay justice in the death of Ellen Greenberg. They used delay tactics to withhold evidence including the 911 calls, autopsy report, and witness testimony. The purpose of the outcome was to conceal the corrupt actions of the Defendants and maintain their high-ranking capacities and income.

17. Members of the enterprise, including several of the Defendants, appeared at hearings in Dauphin County, Pennsylvania, before Judges of the Dauphin County Court of Common Pleas around 2015. At these hearings, members of the enterprise gave false testimony and concealed facts to obstruct justice and prevent accountability. The purpose of the



outcome was to conceal the corrupt actions of the Defendants and maintain their high-ranking capacities and income.

**BRIBERY**

18. Members of the enterprise, including several of the Defendants in Maryland and the State of Pennsylvania, gave and accepted bribes from the other Defendants labeled as "campaign donations and endorsements".

The purpose of the outcome was to conceal the corrupt actions of the Defendants and maintain their high-ranking capacities and income to

promote, endorse, influence, and continue to obstruct justice related to their

organized criminal activity. Bribery is a federal crime and listed pursuant to

18 U.S. Code § 201.

Title 18 U.S. Code § 201 states:

(a) For the purpose of this section—

(1) the term "public official" means Member of Congress, Delegate, or Resident Commissioner, either before or after such official has qualified, or an officer or employee or person acting for or on behalf of the United States, or any department, agency or branch of Government thereof, including the District of Columbia, in any official function, under or by authority of any such department, agency, or branch of Government, or a juror;

(2) the term "person who has been selected to be a public official" means any person who has been nominated or appointed to be a public official, or has been officially informed that such person will be so nominated or appointed; and

(3) the term "official act" means any decision or action on any question, matter, cause, suit, proceeding or controversy, which may at any time be pending, or which may by law be brought before

any public official, in such official's official capacity, or in such official's place of trust or profit.

**(b) Whoever—**

**(1) directly or indirectly, corruptly gives, offers or promises anything of value to any public official or person who has been selected to be a public official, or offers or promises any public official or any person who has been selected to be a public official to give anything of value to any other person or entity, with intent—**

**(A) to influence any official act; or**

**(B) to influence such public official or person who has been selected to be a public official to commit or aid in committing, or collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States; or**

**(C) to induce such public official or such person who has been selected to be a public official to do or omit to do any act in violation of the lawful duty of such official or person;**

**(2) being a public official or person selected to be a public official, directly or indirectly, corruptly demands, seeks, receives, accepts, or agrees to receive or accept anything of value personally or for any other person or entity, in return for:**

**(A) being influenced in the performance of any official act;**

**(B) being influenced to commit or aid in committing, or to collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States; or**

**(C) being induced to do or omit to do any act in violation of the official duty of such official or person;**

**(3) directly or indirectly, corruptly gives, offers, or promises anything of value to any person, or offers or promises such person to give anything of value to any other person or entity, with intent to influence the testimony under oath or affirmation of such first-mentioned person as a witness upon a trial, hearing, or other proceeding, before any court, any committee of either House or both Houses of Congress, or any agency,**

commission, or officer authorized by the laws of the United States to hear evidence or take testimony, or with intent to influence such person to absent himself therefrom;

(4) directly or indirectly, corruptly demands, seeks, receives, accepts, or agrees to receive or accept anything of value personally or for any other person or entity in return for being influenced in testimony under oath or affirmation as a witness upon any such trial, hearing, or other proceeding, or in return for absenting himself therefrom; shall be fined under this title or not more than three times the monetary equivalent of the thing of value, whichever is greater, or imprisoned for not more than fifteen years, or both, and may be disqualified from holding any office of honor, trust, or profit under the United States.

(c) Whoever—

(1) otherwise than as provided by law for the proper discharge of official duty—

(A) directly or indirectly, gives, offers, or promises anything of value to any public official, former public official, or person selected to be a public official, for or because of any official act performed or to be performed by such public official, former public official, or person selected to be a public official; or

(B) being a public official, former public official, or person selected to be a public official, otherwise than as provided by law for the proper discharge of official duty, directly or indirectly demands, seeks, receives, accepts, or agrees to receive or accept anything of value personally for or because of any official act performed or to be performed by such official or person;

(2) directly or indirectly, gives, offers, or promises anything of value to any person, for or because of the testimony under oath or affirmation given or to be given by such person as a witness upon a trial, hearing, or other proceeding, before any court, any committee of either House or both Houses of Congress, or any agency, commission, or officer authorized by the laws of the United States to hear evidence or take testimony, or for or because of such person's absence therefrom;

(3) directly or indirectly, demands, seeks, receives, accepts, or agrees to receive or accept anything of value personally for or because of the testimony under oath or affirmation given or to be given by such person as a witness upon any such trial, hearing, or other proceeding, or for or because of such person's absence therefrom; shall be fined under this title or imprisoned for not more than two years, or both.

(d) Paragraphs (3) and (4) of subsection (b) and paragraphs (2) and (3) of subsection (c) shall not be construed to prohibit the payment or receipt of witness fees provided by law, or the payment, by the party upon whose behalf a witness is called and receipt by a witness, of the reasonable cost of travel and subsistence incurred and the reasonable value of time lost in attendance at any such trial, hearing, or proceeding, or in the case of expert witnesses, a reasonable fee for time spent in the preparation of such opinion, and in appearing and testifying.

(e) The offenses and penalties prescribed in this section are separate from and in addition to those prescribed in sections 1503, 1504, and 1505 of this title.

19. Members of the enterprise, including one of the Defendants in the State of Pennsylvania, accepted bribes and was sentenced to five years of federal prison for the criminal act of Bribery between the dates that the organized crime was being committed and maintained as an entity. The purpose of the outcome was to gain financial interest and promote, endorse, influence, and continue to receive bribes connected with the organized criminal activity.

### **OBSTRUCTION OF JUSTICE**

20. Members of the enterprise, including some of the Defendants obstructed justice in Maryland, and in the State of Pennsylvania, by

withholding evidence requested through the Office of Open Records, Court Subpoenas, and Requests made through the Freedom of Information Act between January 26, 2011, and May 15, 2024.

21. Members of the enterprise also corruptly solicited Maryland and Pennsylvania officials, to violate their oaths to the Maryland and Pennsylvania Constitution and to the United States Constitution by unlawfully concealing medical records, police reports, and tampering with witness testimony relevant to the crimes committed between January 26, 2011, through May 15, 2024.

#### **EXTORTION**

22. Members of the enterprise, including several of the Defendants extorted victims in the State of Pennsylvania, by verbally threatening both the Plaintiff and the Petersons to prevent them from exposing their crimes. The Defendants threatened to incarcerate Matthew and Carolyn Peterson if they exposed the crimes of corruption. The Defendants threatened the Plaintiff to charge her child endangerment and false statements if she continued to file reports to the police.

#### **WITNESS TAMPERING**

23. Members of the enterprise, including several of the Defendants tampered with witnesses in the State of Maryland and Pennsylvania, by

influencing, intimidating, and threatening witnesses regarding the crimes committed between January 26, 2011, through May 15, 2024. Around March 2024, Mindy Kell, a Pennsylvania State investigator was reportedly threatened and intimidated from continuing the investigation which she was assigned to against Defendant Crowell. As a result, she resigned from the case and is no longer employed with the Pennsylvania Department of Bureau of Enforcement and Investigation.

### **KIDNAPPING**

24. Members of the enterprise, including several of the Defendants kidnapped the Petitioners children and the Petersons children by fabricating and falsifying statements to the Court of Common Pleas to obtain a warrant for the removal of the children through the Courts without physical evidence of abuse.

### **SUMMARY OF THE CASE**

25. This is primarily a civil "RICO" action for crimes committed by the Defendants under the Federal Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. § 1964(c)) ("Federal RICO"), for declaratory and injunctive relief, as well as nominal, punitive, and compensatory relief, to redress and to prevent the deprivation of rights, and privileges, as a result of the RICO crimes committed by the Defendants including

corruption, bribery, extortion, kidnapping, witness tampering, and obstruction of justice.

26. In Maryland and Pennsylvania, Defendants are individuals who are employed in official capacities operating in municipal, county, state, and federal positions. The Defendants, in their individual and personal capacities, committed RICO crimes including, but not limited to fraud, falsified statements to public officials, and concealed pertinent information to obstruct justice in botched child abuse investigation, obstructed and delayed justice in the conspiracy and murder of Ellen Greenberg, extorted the Peterson family, and obstructed justice after they neglected to protect the Tutko children. The crimes are related and linked because they all share common Defendants, locations, and sole objectives for organized crime. The purpose of the entity and the goal of the Defendants is to maintain government control, abuse of authority, and security of financial gain.

#### **JURISDICTION AND VENUE**

27. This is an action that primarily arises under the Federal Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. § 1964(c)) ("Federal RICO"), to redress the deprivation, of rights, and privileges for the Plaintiff and public's interest as a whole, and hold accountable the

Defendants who committed crimes under the RICO umbrella to evade liability, profit financially, and maintain authoritative control with the means of Organized Crime in the State of Maryland and Pennsylvania.

28. This action is an actual controversy in which Plaintiff seeks monetary damages because of the injuries and harm caused by the Defendants who violated the Federal Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. § 1964(c)) ("Federal RICO"). Pursuant to 28 U.S.C. §§ 2201 and 2202, this Court may declare the rights of Plaintiff and her minor children and grant further necessary and proper compensatory and nominal relief with treble damages based thereon, including injunctive relief pursuant to Federal Rule of Civil Procedure 65. The Court has jurisdiction over Plaintiffs' claims pursuant to 28 U.S.C. § 1331—because the claims arise under the Federal Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. § 1964(c)) ("Federal RICO"). Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because a Defendant, is domiciled in and operates or does significant business in this judicial district and pursuant to 18 U.S.C § 1965 which states:

- (a) Any civil action or proceeding under this chapter against any person may be instituted in the district court of the United States for any district in which such person resides, is found, has an agent, or transacts his affairs.
- (b) In any action under section 1964 of this chapter in any district court of the United States in which it is shown that the ends of justice require that other parties residing in any other district be brought before the court, the court may cause such parties to be summoned, and process for that



purpose may be served in any judicial district of the United States by the marshal thereof.

(c) In any civil or criminal action or proceeding instituted by the United States under this chapter in the district court of the United States for any judicial district, subpoenas issued by such court to compel the attendance of witnesses may be served in any other judicial district, except that in any civil action or proceeding no such subpoena shall be issued for service upon any individual who resides in another district at a place more than one hundred miles from the place at which such court is held without approval given by a judge of such court upon a showing of good cause.

(d) All other process in any action or proceeding under this chapter may be served on any person in any judicial district in which such person resides, is found, has an agent, or transacts his affairs.

(Added Pub. L. 91-452, title IX, §901(a), Oct. 15, 1970, 84 Stat. 944.)

#### PARTIES

29. Plaintiff, Hadassah Feinberg, a previous resident of Baltimore, Maryland, resided in Dauphin and Cumberland County, Pennsylvania between 2011 through 2024.

30. Defendant Ferdinand Cintron Jr., in his individual and personal capacity is employed by Baltimore City Police Department located at 601 East Fayette Street, Baltimore, Maryland 21202, and resides in the State of Maryland.

31. Defendant Josh Shapiro in his individual and personal capacity is employed as Governor of Pennsylvania located at 2035 North Front Street Harrisburg, Pennsylvania 17102.

32. Defendant Francis Chardo, Esq., in his individual and personal capacity is employed by Dauphin County District Attorney's office located at 101 Market Street, Harrisburg, Pa. 17101.

33. Defendant Colin Zwally, in his individual and personal capacity is employed by Dauphin County District Attorney located at 101 Market Street, Harrisburg, Pa. 17101.

34. Defendant Michelle Avery, in her individual and personal capacity is employed by Dauphin County District Attorney located at 101 Market Street, Harrisburg, Pa. 17101.

35. Defendant Emily Hoffman, in her individual and personal capacity, is employed by Dauphin County District Attorney located at 101 Market Street, Harrisburg, Pa. 17101.

36. Defendant Joshua Young, in his individual and personal capacity, is employed by Office of Open Records-Commonwealth of Pennsylvania located at 333 Market Street, 16<sup>th</sup> Floor, Harrisburg, Pa. 17101.

37. Defendant Wayne A. Jacobs, in his individual and personal capacity is employed as Special Agent for the FBI Philadelphia Field Office located at 600 Arch Street #8, Philadelphia, Pa. 19106.

38. Defendant Jeff Enders, in his individual and personal capacity is employed as Director of Dauphin County Department of Public Safety located at 911 Gibson Blvd. Steelton, Pa. 17113.

39. Defendant Stephen Libhart, in his individual and personal capacity is employed as Court Administrator of Dauphin County Common Pleas located at 101 Market Street, Harrisburg, Pa. 17101.

40. Defendant Sally Lupini, in her individual and personal capacity is employed for Pennsylvania Department of Human Services, located at 2525 North 7<sup>th</sup> Street, Harrisburg, Pa. 17110.

41. Defendant Carrie Self, in her individual and personal capacity is employed by the Pennsylvania Department of Human Services, located at 2525 North 7<sup>th</sup> Street, Harrisburg, Pa. 17110.

42. Defendant Gabi Williams, in her individual and personal capacity is employed by the Pennsylvania Department of Human Services, located at 2525 North 7<sup>th</sup> Street, Harrisburg, Pa. 17110.

43. Defendant Valerie Arkoosh, in her individual and personal capacity is employed as Secretary of the Pennsylvania Department of Human Services, located at 2525 North 7<sup>th</sup> Street, Harrisburg, Pa. 17110.

44. Defendant Vincent Paese, in his individual and personal capacity as Open Records Officer in the Dauphin County Office of Open Records, located at 333 Market Street, 16<sup>th</sup> Floor, Harrisburg, Pa. 17101.

45. Defendant Laval Miller-Wilson, in her individual and personal capacity is employed as Deputy Secretary for Office of Children, Youth, and Families, located at 2525 North 7<sup>th</sup> Street, Harrisburg, Pa. 17110.

46. Defendant Andrea Bankes, in her individual and personal capacity is employed as Director of Open Records for the Department of Human Services, located at 2525 North 7<sup>th</sup> Street, Harrisburg, Pa. 17110.

47. Defendant Corey Dickerson, in his individual and personal capacity is employed as Chief in Dauphin County's Criminal Investigative Division, located at 2 South 2<sup>nd</sup> Street, #3, Harrisburg, Pa. 17101.

48. Defendant Andrew Bath, in his individual and personal capacity is employed as Detective in the Harrisburg Police Department, located at 123 Walnut Street, #217, Harrisburg, Pa. 17101.

49. Defendant Christian Ribec, in his individual and personal capacity is employed as law enforcement officer for the Harrisburg Police Department, located at 123 Walnut Street, #217, Harrisburg, Pa. 17101.

50. Defendant Adam Young, in his individual and personal capacity, is employed as law enforcement officer for the Susquehanna

Township Police Department, located at 1900 Linglestown Rd., Harrisburg, Pa. 17110.

51. Defendant Lee Ann Tarasi, in her individual and personal capacity is employed as Detective for the Susquehanna Township Police Department, located at 1900 Linglestown Rd., Harrisburg, Pa. 17110.

52. Defendant Robert Martin, in his individual and personal capacity is employed as Chief of Police for the Susquehanna Township Police Department, located at 1900 Linglestown Road, Harrisburg, Pa. 17110.

53. Defendant Marcie Smith, in her individual and personal capacity is a resident of Pennsylvania located at 503 State Street, Steelton, Pa. 17061.

54. Defendant Eric Smith, in his individual and personal civilian capacity is a resident of Pennsylvania, located at 503 State Street, Steelton, Pa. 17061.

55. Defendant Rosa Cruz, in her individual and personal civilian capacity is a resident of Pennsylvania, located at 63 North 18<sup>th</sup> Street, Harrisburg, Pa. 17103.

56. Defendant Mandjou Sylla, in his individual and personal civilian capacity is a resident of Pennsylvania and located at 63 North 18<sup>th</sup> street, Harrisburg, Pa. 17103.

57. Defendant Joshua Appleby, in his individual and personal capacity is employed by the Harrisburg City Police Department, located at 123 Walnut Street, #217, Harrisburg, Pa. 17101.

58. Defendant Alyssa Schatz, in her individual and personal capacity is employed by UPMC Harrisburg Hospital, located at 111 S. Front Street, Harrisburg, Pa. 17101.

59. Defendant Kathryn Crowell, in her individual and personal capacity as is employed by Penn State Hershey Hospital, located at 500 University Drive, Hershey, Pa 17033.

60. Defendant Kenny Young, in his individual and personal capacity is employed by the Harrisburg City Police Department, located at 123 Walnut Street, Harrisburg, Pa 17101.

61. Defendant Tom McGarrity, in his individual and personal capacity as Captain of the Harrisburg City Police Department, located at 123 Walnut Street, #217, Harrisburg, Pa. 17101.

69. Defendant Amanda Ozenbaugh, in her individual and personal capacity as Supervisor for Dauphin County Children and Youth, located at 1001 North 6<sup>th</sup> Street, Harrisburg, Pa. 17102.

70. Defendant George P. Hartwick III, in his individual and personal official capacity as Dauphin County Commissioner, located at 2 South 2<sup>nd</sup> Street, 4<sup>th</sup> Floor, Harrisburg, Pa. 17101.

71. Defendant Julie Reis, in her individual and personal capacity as Secretary for the Dauphin County Commissioners Office, located at 2 South 2<sup>nd</sup> Street, 4<sup>th</sup> Floor, Harrisburg, Pa. 17101.

72. Defendant Currin Haines-Yoder, in her individual and personal capacity as Supervisor for Dauphin County Children and Youth, located at 1001 North 6<sup>th</sup> Street, Harrisburg, Pa. 17102.

73. Defendant Sean McCormack, in his individual and personal capacity as District Attorney for Cumberland County District Attorney, located at 1 Courthouse Square, Floor 2, Carlisle, Pa. 17013.

74. Defendant Tamara B. Willis, in her individual and personal capacity as Superintendent for the Susquehanna Township School District, 1201 North Progress Avenue, Harrisburg, Pa. 17109.

75. Defendant Erika Martel, in her individual and personal capacity as an Employee of Dauphin County Children and Youth, located at 1001 North 6<sup>th</sup> Street, Harrisburg, Pa. 17102.

76. Defendant Michael Palermo, in his individual and personal capacity as Court-Appointed Attorney, for Dauphin County, located at 3300 E. Trindle Rd., Camp Hill, Pa. 17011.

77. Defendant John F. Cherry, in his individual and personal capacity as Dauphin County Court of Common Pleas Judge, located at 101 Market Street, Harrisburg, Pa. 17101.

78. Defendant John J. McNally in his individual and personal capacity as Dauphin County Court of Common Pleas Judge, located at 101 Market Street, Harrisburg, Pa. 17101.

79. Defendant Matthew P. Smith, in his individual and personal capacity as Cumberland County Court of Common Pleas Judge, located at 1 Courthouse Square, Carlisle, Pa. 17013.

80. Defendant Kimberley Kardelis, in her individual and personal capacity as Solicitor for Dauphin County Children and Youth, located at 1001 North 6<sup>th</sup> Street, Harrisburg, Pa. 17102.



81. Defendant Edward E. Guido, in his individual and personal capacity as Cumberland County Common Pleas Judge, located at 1 Courthouse Square, Carlisle, Pa. 17013.

82. Defendant Marlon Osbourne, in his individual and personal capacity as Medical Examiner, located at 3561 SW 10th St. Pompano Beach, FL 33069.

83. Defendant Larry Krasner, in his individual and personal capacity as Greenberg Counsel and District Attorney, located at 3 S Penn Sq, Philadelphia, PA 19107.

84. Defendant Andrea Martin, in his individual and personal capacity as Principal of Susquehanna Township School located at 1201 N Progress Ave, Harrisburg, PA 17109.

85. Defendant Samuel Goldberg, in his individual and personal capacity as NBC reporter located at 130 E 18th St #6G New York, NY 10003.

86. Defendant Bridget Whitley, in her individual and personal capacity as criminal law clerk for the Dauphin County Court of Common Pleas located at 101 Market Street, Harrisburg, Pa. 17101.

87. Defendant Brad Winnick, in his individual and personal capacity as law clerk for the Dauphin County Court of Common Pleas located at 101 Market Street, Harrisburg, Pa. 17101.

88. Defendant James Schwartzman, in his individual and personal capacity as Partner and Chair of the Ethics and Professional Responsibility Group at Stevens & Lee Law firm located at 1500 Market St 18th Floor, Philadelphia, PA.

89. Defendant Rufus Seth Williams, in his individual and personal capacity as prior district attorney located at 1322 S. 26TH STREET, Philadelphia, Pa. 19146.

90. Defendant Brian Wolfe, in his individual and personal capacity as Lt. of the Pennsylvania State Police located at 8000 Bretz Drive, Harrisburg, PA 17112

91. Defendant Paige Kulsa, in her individual and personal capacity as state trooper of the Pennsylvania State Police located at 2

Dunwoody Drive Carlisle PA 17015

92. Defendant Bryan R. Henneman, in his individual and personal capacity as Lt. of the Pennsylvania State Police located at 2 Dunwoody

Drive Carlisle PA 17015

93. Defendant Rogette Harris, in her individual and personal capacity as assistant deputy for the Dauphin County Court of Common Pleas located at 101 Market Street, Harrisburg, Pa. 17101.

94. Defendant Stephen Olszewski, in his individual and personal capacity as investigator located at 240 Spring Garden St. Philadelphia PA 19123.

95. Defendant Anna M. Ciardi is Disciplinary Counsel for the Supreme Court of Pennsylvania located at 437 Grant Street, Suite 1300, Pittsburgh, Pa. 15219.

#### **FACTUAL ALLEGATIONS**

96. On October 12, 2023, at 12:40 p.m., the Plaintiff was notified by two credible members of the Jewish Community, Faye Doctrow, and Samara Sofian, that the four Smith children had been missing for six days. The Plaintiff reported the missing children Dauphin County Dispatch 9-1-1.

97. On October 12, 2023, at 6:00 p.m., the Smith children were located by Defendant Christian Ribec of the Harrisburg Police Department at 63 North 18<sup>th</sup> Street, Harrisburg Pa. 17103. The children were found soiled in feces, and unclothed. They had been reportedly abandoned by Defendant Marcie Gail Smith, their biological mother, and primary care giver.

98. On October 12, 2023, at 7:00 p.m. the Plaintiff voluntarily assisted the Smith children, provided them clothing from her trunk in presence of multiple witnesses.

99. On October 12, 2023, Dauphin County CYS Supervisor, Defendant Noelle Barrett, refused to arrive to the scene to aid the Smith children. The Plaintiff transported the four Smith children to her home, released to her care by Defendant Christian Ribec, of Harrisburg Police Department. Plaintiff was assisted by a social worker, and another friend, in transporting the four Smith children to her home located at 3807 Bonnyview Road, Harrisburg, PA 17109.

100. Upon arrival, Plaintiff bathed the Smith children where she noted numerous bruises on their bodies. She made a report to Childline and two police departments, and tried to contact Defendants again, but to no avail.

101. On October 13, 2023, Plaintiff sent Smith child, E.J.S. to school, and took the younger three Smith children to UPMC emergency room located at 111 S. Front St, Harrisburg, PA 17101 where they were diagnosed with suspected child abuse by Defendant Alyssa Schatz, PA-C. Defendant Alyssa Schatz made a police report and called ChildLine. At 3:30 p.m., Plaintiff contacted Defendant George Hartwick III because

Dauphin County CYS staff were not coming to aid the Smith children. She talked to his secretary Defendant Julie Reis.

102. On October 13, 2023, at 6:30 p.m. Defendant, Dauphin County Supervisor Defendant Scott Smith, came out to the Plaintiff's home to visit the Smith children. Defendant Smith photographed the Smith's injuries. During the house tour Defendant Smith asked about A.N.F.'s safety bed. Plaintiff provided him with medical documentation prescribed by a pediatrician and explained that the bed was for A.N.F. safety at night. He had no concern and refused to take documentation offered by the Plaintiff.

103. On October 15, 2023, Defendants consented to arrange transportation for the Smith Children from the Plaintiffs home to respective schools for kinship purposes. There were no concerns mentioned by DCCYS regarding Plaintiff's ability to care for her own four children, and four more young children, totaling 8 children, by herself as a single mother.

104. On October 16, 2023, at 9:30 a.m. DCCYS facilitated a meeting with the Smith children's biological mother, Defendant Marcie Smith and the Plaintiff, regarding kinship. They did not inform the biological father, Defendant Eric Smith to attend. At the meeting, Defendant Marcie Smith, agreed for her children to remain with the Plaintiff and voluntarily signed legal custody to DCCYS for E.J.S. (DOB 12/17/2017), E.S. (DOB

6/18/2020), E.R.S. (6/18/2020), and (E.N.S. 6/18/2021). At the meeting, Marcie Smith lied about why she was unable to obtain housing for her family. The Defendant had a domestic violence charge for serious bodily injury. She falsely accused Defendant Eric Smith, the father, and informed DCCYS that he is the violent one.

105. On October 16, 2023, at 3:30 p.m. Defendant Allison Vajdic arrived at Plaintiffs home located at 3807 Bonnyview Road, Harrisburg, Pa 17109 to initiate intake for kinship. She did a tour of the Plaintiff's home. No concerns were noted. During the visit, Plaintiff disputed the agency of choice. She requested to work with Pa. Mentor instead of Families United, as she was already in communication with that agency. DCCYS verbally threatened the Plaintiff that Title IV-E funds would be withheld for the Smith children's kinship if she did not agree to work with Families United. The Plaintiff stood her ground and told them she would not agree.

106. On October 17, 2023, Plaintiff filed a complaint against DCCYS for withholding funds for the Smith children's basic needs under Title IV-E and for failure to investigate the Smith children's abandonment and physical abuse. At 11:00 a.m. Plaintiff took the Smith children into Penn State Hershey Medical Center to follow up with their special child abuse unit. Plaintiff informed Defendant Dr. Kathryn Crowell of DCCYS's failure to

assist the children. Plaintiff had also sent a message through the Penn State portal prior to the visit and received no response. During the visit, E.S. DOB 6/18/2020, was banging his head on the hard-surfaced floor in room 54. Defendant Crowell and her team failed to provide adequate medical care for his needs, which was documented by Plaintiff to DCCYS through email and telephone calls. Plaintiff served a subpoena to obtain video footage of the incident, issued by the Cumberland Court of Common Pleas Prothonotary Office, and filed it under civil case: *Feinberg, H. v. Dauphin County GYS, et al.*, see docket number 2023cv02165. However, it was intentionally blocked by Penn State Hershey legal team, and the footage documenting the willful fraud and child endangerment of E.S. by hospital staff was not provided to the Plaintiff.

107. Plaintiff informed Defendants that she could not take E.S. home without an implemented safety plan in place due to head-banging self-injurious behavior. Plaintiff has vast experience with behavioral therapy from professional experience. Defendants Dr. Crowell and DCCYS staff ignored Plaintiff's reports. At 3:00 p.m., Plaintiff was advised by a Licensed Clinical Social Worker and Director of an Adoption and Foster care Agency in Dauphin County, that she should inform medical staff of her timely obligation to leave to get her own children off the bus. Since E.S. was a

danger to himself, by head-banging, he needed to remain under medical observation.

108. Two staff on the child abuse team, one male and one female (personnel names unknown), threatened the Plaintiff stating, "If you don't take all three children home, you are not taking any of them home." They did nothing to prevent E.S. from injuring his head. Plaintiff was forced into a corner, where the safest choice was to leave E.S. in the care of medical staff, along with his two siblings, and leave to get her own biological children off the bus from school. Per the Plaintiff's request, the LCSW from Jewish Family Services, remained on the phone with Plaintiff until she stepped out of the hospital building. Plaintiff was in absolute fear of the illegal and unethical actions of the Penn State Hershey Staff. Plaintiff filed a police report against Defendant Dr. Kathryn Crowell with Officer Libby Strayer from the Derry Township Police Department, see report number DR-24-03954, for tampering with medical documentation, fraud, and failing to provide medical care to E.S.

109. On October 18, 2023, Plaintiff visited the Harrisburg Police Department located at 123 Walnut Street, #217, Harrisburg, Pa. 17101 and Victim Witness Department located at 25 South Front Street, 7<sup>th</sup> Floor, Harrisburg, Pa. 17101 to advise and follow up on complaints about the



Smith children's endangerment by the biological mother and Defendants retaliation, fraud, obstruction of justice, and intimidation for exposing them.

110. Subsequently, Defendant Smith filed a fabricated CPS report against Plaintiff. Plaintiff was uninformed until Defendant Smith visited the children's schools on October 19, 2023. In his report, Defendant Smith falsified statements against the Plaintiff without grounds. Plaintiff requested the records from the County and their legal counsel, Donald Carmelite, Esq., but the requests have been ignored. It is important to note, that for due process to be commenced and discovery to be conducted, the records are essential for the judicial process. By intentionally obstructing the release of records from Dauphin County Children and Youth Services, Childline reports, and Department of Human Services records, the Defendants are tactically preventing the Plaintiffs expert witness, Charles F. Lorbeer, PhD, from assessing the concerns and providing this Court with an informed statement on the matter required by a Certificate of Merit.

111. It is under the discretion of this Court, but respectfully requested by this Plaintiff, that the Defendants be directed by official Court Order to supply and provide a notarized copy of the official Feinberg CPS record, unredacted and in its entirety, within a reasonable time frame, for

review, in order to execute and comply with the rules of due process and discovery pursuant to the federal laws of civil procedure.

112. On October 19, 2023, Defendant Smith went into Sara Lindemuth Anna Carter Primary School located at 1201 North Progress Avenue, Harrisburg, Pa 17109, and into the Silver Academy private school located at 2986 North Second Street, Harrisburg, Pa. 17110, unannounced, to conduct groundless interviews from the Feinberg children without a warrant. A.N.F., E.L.F., and E.A.F. were forced against their will to cooperate with the Defendants interrogations, in a secluded room, alone with the Defendant with the door closed. Defendant Smith asked the children to tell him about "dark secrets" and attempted to coerce them to make false statements about A.N.F.'s safety bed in the Plaintiff's home. They were uncooperative. Principal Samara Sofian, the Plaintiff that she relayed to Defendant Smith that she was "Not concerned for abuse or neglect of the Feinberg children", and that she, "Takes her mandated reporting responsibilities seriously." Defendant Smith interrogated the Feinberg children for an unreasonable period. E.L.F. informed Defendant Smith that the bed was to, "Provide A.N.F. safety at night because he was a danger to himself and his family without supervision". E.L.F. informed him that A.N.F had a history of safety concerns.

113. Defendant Smith's interview triggered excessive fear, panic, and symptoms of anxiety in A.N.F., who is an eight-year-old, verbal-autistic child, and already diagnosed with underlying anxiety. He told A.N.F. that, "He is bad, and that he is going to take his mother away". Upon the children's return from school, A.N.F. immediately exhibited severe panic attacks, causing shallow breathing, confusion, and erratic behavior. The Plaintiff called 9-1-1 twice and A.N.F. was transported to the UPMC Emergency Room located at 111 South Front Street, Harrisburg, Pa. 17101. What should have been a birthday celebration for E.A.F., turned in to a nightmare of permanent trauma.

114. Upon arrival at the hospital, the treating physician increased A.N.F.'s anxiety medication, and he was discharged home with the Plaintiff. Plaintiff repeatedly implored law enforcement to protect her family against DCCYS employees' actions, but they declined stating, "Municipal can not intervene in County matters" and that Plaintiff should "File a complaint with Attorney General" (Corporal Glenn, Susquehanna Township Police Department).

115. Plaintiff made multiple attempts to file complaints with Attorney General which are documented, but she was advised by staff to contact the

Department of Human Services who oversees Defendants. For days, Plaintiff was sent in circles between authorities who refused to get involved.

116. On October 20, 2023, Defendant Smith arrived unannounced at UGRO Childcare Center located at 3880 Tec Port Drive, Harrisburg, Pa. 17111, where B.N.F. was enrolled part-time. Upon his arrival, daycare staff contacted the Plaintiff to inform her that Defendant Smith was proceeding against their request to await law enforcement presence, and/or a third-party, as directed by the Plaintiff. Plaintiff had openly communicated with UGRO administration about her concerns for county employee retaliation. They were also informed that Plaintiff had been licensed as a foster care parent and adopted through Dauphin County's recommendation in 2022, and that Plaintiff had a verbal contract with the county to satisfy the financial cost of B.N.F.'s attendance at UGRO, in lieu of an increased annual per diem.

117. Defendant Smith proceeded with the interview for a child that was not at risk, against the directive of his custodial parent, and against the directives of his educational guardians, in the academic setting, without suspicion of abuse.

118. On October 20, 2023, Plaintiff traveled with her four children to visit family friends in Maryland and seek legal advice. During her travels,

she contacted law enforcement in Baltimore, Maryland, Defendant Ferdinand Cintron, Jr., seeking advice against Dauphin County employees. The officer lied about his affiliated department and did not respond to the location of the Plaintiff and her children, and it is fair to presume, that he contacted Dauphin County.

119. Plaintiff proceeded with attempts to contact Maryland State Police, and they directed Plaintiff up the chain of command. Through each step, Plaintiff stayed in close contact and consulted with family members, close friends, and licensed professionals, about the incidents.

120. Plaintiff contacted multiple licensed attorneys, one of whom is an experienced federal attorney in the Middle District Court. He requested anonymity, but informed the Plaintiff of the statewide corruption, intimidation, and retaliation, historically documented relating to the child protective agency, and that successful litigation against CYS misconduct was an uphill battle. A separate civil rights attorney offered the Plaintiff representation on terms of executing a binding legal contract in the amount of \$100,000, but the Plaintiff could not commit for financial reasons.

121. On October 23, 2023, Plaintiff learned that public corruption is handled and investigated primarily by the Federal Bureau of Investigation. Since she was out-of-state, she requested to visit the nearest FBI field

office to report the county employees abuse of power, fraud, and corruption. Plaintiff met with Supervisory Field Agent, Kenneth Keller, based in Manassas, Va., about an hour drive from her stay. Agent Keller informed her that due to jurisdiction, the Philadelphia Field Office, would be her best point of contact, but that per policy he would complete an official report. Agent Keller provided the Plaintiff with his email address and phone number. During the three-hour visit, Agent Keller and his co-agent, "Ben" observed the Plaintiff with her four children in person and made no attempt to file a ChildLine report for concerns of the Plaintiffs interactions with her children during the visit. The children were clean, fed, and dressed appropriately. Although the children became restless as the visit progressed, the agents did not pass judgement or show reason for concern with the Feinberg children.

122. On October 24, 2023, Plaintiff returned to Dauphin County with her four children and dropped them off at school. Shortly after, Plaintiff was apprehended by a Susquehanna Township Police Officer Defendant "AJ Young", without a traffic violation. Officer Young is named a Defendant in the pending federal suit for RICO crimes. The apprehension and citation issued by Defendant Officer Young was subsequently dismissed on

December 18, 2023, after Plaintiff filed an appeal to the Magistrate Court 12-1-01. It was dismissed prior to trial.

123. Triggered by the groundless apprehension, Plaintiff knew she was in danger, and followed the suggestion of Agent Keller to visit the correct jurisdiction field office, Philadelphia FBI Office. Upon her arrival, she was turned away without interview. The Agent at the entrance refused to accept a report. Plaintiff contacted Agent Keller by phone to prove the validity. Agent Keller informed the Philadelphia Agent that the report was not yet complete in the system, but that it was pending. The Agent disregarded Keller's statements, and Plaintiff returned to Dauphin County. Upon her return, Plaintiff called the Philadelphia Field Office to provide physical and audio evidence but did not respond. An agency established to safeguard and protect, once again, falling its citizens.

124. Around March 2024, Plaintiff learned about other victims facing the same crimes committed by the Defendants through her public Facebook page, "Speak Up". Multiple victims sent the Plaintiff private messages giving witness statements to the Plaintiff regarding the corruption, extortion, and obstruction of justice committed by the Defendants under the entity between 2011 to 2024. Numerous victims have attempted to obtain assistance from the Pennsylvania Disciplinary Board

including the Plaintiff and Defendant Anna M. Ciardi has closed out the cases without investigation for frivolous reasons and to ensure that the Commonwealth Enterprise is protected.

125. On April 3, 2024, Plaintiff contacted Agent Keller, in response to an email she received from him. He informed her that despite his attempts to communicate with the FBI Philadelphia Field Office, he has no jurisdiction in Pennsylvania. He informed the plaintiff of her options to file a complaint with the Department of Justice for review of the internal handlings conducted by the Philadelphia Field Office.

126. Plaintiff filed with the Department of Justice, and on April 16, 2024, she filed a complaint with the Government Accountability Office for fraud, waste, and abuse by the Defendants.

127. Contemporaneously, on April 5, 2024, Plaintiff filed with the Dauphin County Clerk of Court an "Appeal of District Attorney's Denial" for the Private Criminal Complaint lodged against Defendant Marcie Gail Smith and the Defendants on February 1, 2024, at MDJ 12-1-05. Defendant ADA Colin Zwally, who stated to the Plaintiff that he has a "job to protect" in the presence of Defendant CID Chief Corey Dickerson. Plaintiff contacted the Philadelphia Field Office to provide physical and audio evidence, but they have not responded.



128. During the unprecedented sequence of events, and without any assistance, Plaintiff was compelled to permanently leave her home with her four children. A mortgage of \$2177 per month, would not outweigh the priceless cost she faced if her children were permanently separated. She had lived in Dauphin County for 25 years and was established within her community. However, the Plaintiff was obliged to prioritize the immediate risk to her family and protect her children and herself against criminal acts committed by the Defendants. Plaintiff fled Dauphin County preemptively to avoid losing her children permanently through lies, fraud, and malicious corruption. Shortly thereafter, Plaintiffs notions, and gut instinct, were confirmed regarding the Defendants intent and objective.

129. Plaintiff is certain, and without regret, that the lifesaving decision she made to flee the Defendants crimes, is what saved her family. Matthew and Carolyn Peterson, fellow foster, and adoptive parents who positively impacted hundreds of vulnerable children, were harmed permanently without recourse by the same state actors. Their six children were trafficked by the same Defendants in 2019 on baseless grounds that were not pursued. They were verbally threatened and intimidated, by Defendant Tarasi. They were not afforded legitimate due process and were stripped of their constitutional rights under the same authority. Carolyn

Peterson suffered two consecutive heart attacks because of the overwhelming emotional distress. Reunification did not occur, despite the dismissal of charges. When will state actors be held liable for their white-collar crimes? Public interest in this matter is compelling. In Adams County, Pennsylvania, three state actors were recently charged with child endangerment after Iris Mummert, a fifteen-month-old baby was found deceased after the county overlooked the concerns. Will this happen to the Smith children who were abandoned by their mother, left soiled in feces, and unclothed on October 12, 2023? This is a perfect example of how the county welfare system is failing its children and failing its families. In Adams County, Pennsylvania, the employees were charged, but only due to the severity involving a death, and media exposure. The Smith children were in imminent risk, not just one child, but four children, left to fend for themselves, each one of them lacking bladder control upon discovery. To conceal, control, and keep their authoritative positions, the Defendants would rather shift blame for their mistakes and make the Plaintiff "look crazy," then accept accountability. They prefer to endanger four Smith Children and traumatize four Feinberg children, then risk losing their job or going to jail.

130. The Defendants attempted to influence the neighboring county during their meeting, but Cumberland County conducted their own meeting separately after they had met with the Defendants. The Defendants fabricated allegations didn't sit right with them, so they didn't follow along (Sandy Gibson, LCSW).

131. Towards the last week of October 2023, Plaintiff fled with her four children to the neighboring Cumberland County. Plaintiff consistently ensured that her children's daily attendance in their Dauphin County schools would not be affected and continued to take her children to all their scheduled medical visits in Dauphin County. No concerns were reported for neglect, abuse, or mental instability by any mandated reporter in the schools or doctors' offices. The only reports made to date, were made by individuals and state actors, who had a personal and professional interest to harm the Plaintiff and other victims to obstruct justice and continue their commission of organized criminal activity through their long-established entity which is referenced in a published book titled, "Pressed: Public Money, Private Profit: A Cautionary Tale", by Author and County Commissioner Molly Henderson.

132. It is documented and factually supported that the Plaintiff's children were thriving on November 1-2, 2023, when B.N.F. and A.N.F.

were present at a Penn State Doctors appointment, the day preceding the false removal of the children which alleged "imminent risk." The actual risk was the Defendants corruption, and extortion, to retaliate, maintain control, and avoid liability for their crimes.

133. In between the dates of October 18, 2023, to November 3, 2023, the Defendants used their authoritative powers to work collaboratively with Defendant Detective Lee Tarasi and Defendant Officer Young from the Susquehanna Township Police Department, to devise, lure, ambush, falsely remove custody, and charge the Plaintiff with crimes she did not commit.

134. Unbeknownst to the Plaintiff at the time, the Defendants and their colleagues have a vast history of committing such crimes together, against numerous victims, and have never been investigated by any agency. The Defendants in this case continue to be employed without suspension, corrective action, or criminal charges, despite the heinous crimes they have committed under the mask organized criminal entity.

135. Defendant Lee Ann Tarasi contacted the Plaintiffs peer, Amy Otstott, and falsely informed her that she was investigating the crimes of the county and needed the cooperation of the Plaintiff. In response, Amy Otstott convinced the Plaintiff to schedule a meeting with Defendant Tarasi

on November 3, 2023, at her vacant home in Dauphin County. Under the impression that a law enforcement official was assisting, Defendants successfully lured the Plaintiff back to her uninhabited Dauphin County home located at 3807 Bonnyview Road, Harrisburg, Pa. 17109, where they served her with papers to remove the care and custody of her children under falsified grounds for "imminent risk". This was commenced despite DHS's investigation conducted by Defendant Carrie Self on October 25, 2023, who claimed to "prioritize" and have more concern for the safety allegations regarding the Smith children, and not concerned for the false allegations made against the Plaintiff involving the Feinberg children. She confidentially informed the Plaintiff that Plaintiffs complaint against the Defendants preceded their retaliatory complaint, and they were not aware.

136. On November 6, 2023, in the chambers of Defendant John J. McNally, Judge, of Dauphin County Common Pleas, Plaintiff informed him of the corruption, retaliation, and jurisdictional dispute. Defendant McNally subsequently ordered the case transfer to Cumberland County Court of Common Pleas and Cumberland County Children and Youth Services (CCCYS).

137. On November 8, 2023, Defendant Edward E. Guido, reluctantly accepted the transferred case in Cumberland County. During the hearing,

the Plaintiff was denied her request to self-represent without justification, and appointed public counsel on the spot, who was not familiar with the case. The Plaintiff was denied her constitutional rights to due process and prevented from being able to respectfully object to statements made by Defendant Wheeler who perjured herself before the court. During the hearing, Defendant Wheeler requested to withdraw A.N.F.'s enrollment in the Cumberland school and return it to Dauphin County against his mother's calculated decision to avoid the Defendants jurisdictional abuse of power. Defendant Wheeler's request was denied by Defendant Edward E. Guido. Defendant Wheeler was questioned by Defendant Guido as to why she had withheld A.N.F.'s attendance at school.

138. Between November 8, 2023, through November 15, 2023, CCCYS confirmed that there was no imminent risk to the Feinberg children despite the exhaustive claims by the Defendants. Sandy Gibson, LCSW, stated that she "found it odd", that the children had been removed without their clothing and belongings when they were not being harmed and all their needs were being met, unlike the incident of the Smith children who were naked and soiled when they were found by Police officer Christian Ribec.

139. On November 16, 2023, CCCYS withdrew DCCYS's petition for Dependency, and the Plaintiff's children were returned without adjudication.

140. Plaintiff cooperated with CCCYS reluctantly by signing releases of her private information regarding medical and mental health records out of fear that her children could be removed again from her care. She felt compelled through because of the Defendants abuse of power, and the actions they had taken to harm her family.

141. Since October 2023, the Plaintiff and her children have continued to experience severe post-traumatic stress symptoms caused by the Defendants crimes. The children are fearful to sleep alone, and the presence of any authorities remind them of the horrors in Dauphin County.

142. All aspects of the Plaintiffs life have been damaged, and affected in a way that will never be repaired. Plaintiff incurred excessive debts because of the Defendants crimes, and lost thousands of dollars in equity amidst the swift sale of her home, which she had no plans to sell, prior to the Defendants corruption, extortion, intimidation, and other crimes.

143. The Plaintiffs credit declined due to the mortgage forbearance applied. It was also damaged due to emergency over-utilization necessary for temporary shelter for her children. As the Plaintiff and her children struggled to survive, they could not qualify for food-stamps under the

mortgage and additional rental payments built up, because there is no program guideline set up to calculate and consider this form of domestic "refugee crisis" caused by Dauphin County Children and Youth agency. Plaintiff employed survival hacks, such as watering down whole milk, increasing inexpensive carbs, i.e. rice, pasta, and purchasing unpreferred groceries that were marked down as for soon to expire or next day break at Walmart. While this may be instance that occurs in third world countries, this should not be caused to occur in a progressive democratic country who resources are endless. Most certainly, this should not be caused by the very same agency that was established to protect families and children. Legislature has failed the communities and populations by enabling such authorities to have unlimited excess discretion against innocent victims. Attempts to raise money through crowd funding were futile. The children were disenrolled from long-term community programs they could no longer access. The children were isolated from their community of friends who were afraid of the Defendants authority. She has also incurred excessive transportation costs due to the distance between her current residence and the children's school in Dauphin County. She continues to transport them, but has accrued over \$15,000 in debt from the displacement, and the debts are increasing.



246, Title 18, U.S.C., § 373, Title 18, U.S.C., § 1201, Title 18, U.S.C., § 1204, Title 18, U.S.C., § 1503, Title 18, U.S.C., § 1505, Title 18, U.S.C., § 1506, Title 18, U.S.C., § 1510, Title 18, U.S.C., § 1511, Title 18, U.S.C., § 1512, Title 18, U.S.C., § 1513, Title 18, U.S.C., § 1514, Title 18, U.S.C., § 1518, Title 18, U.S.C., § 1592, Title 18, U.S.C., § 1623, Title 18, U.S.C., § 1621, Title 18, U.S.C., § 1622, Title 18, U.S.C., § 1623, Title 18, U.S.C., § 1957, Title 18, U.S.C., § 2236, Title 18, U.S.C., § 2237, Title 18, U.S.C., § 2340, Title 18, U.S.C., § 4304, and Title 18, U.S.C., § 6301 for declaratory and injunctive relief, as well as nominal, punitive, and compensatory relief, to redress and to prevent the deprivation of rights, privileges, caused by the Defendants crimes under the by way of Organized Crime, pursuant to the Federal Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. § 1964(c)) ("Federal RICO"). The Defendants, having not acted lawfully in their individual and personal capacities, and having committed State and Federal violations both civil and criminal, are allegedly guilty of the following crimes.

### COUNT I

(Plaintiff Hadassah Feinbergs claim against Defendants Ferdinand Cintron, Josh Shapiro, Francis Chardo, Colin Zwally, Michelle Avery, Emily Hoffman, Joshua Young, Jeff Enders, Stephen Libhart, Sally Lupini, Carrie Self, Gabi Williams, Valerie Arkoosh, Vincent Paese, Laval Miller-Wilson, Andrea Bankes, Corey Dickerson, Andrew Bath, Christian Ribec, Adam Young, Lee Ann Tarasi, Robert Martin, Marcie Smith, Eric Smith, Rosa

Cruz, Mandjou Sylla, Joshua Appleby, Alyssa Schatz, Kathryn Crowell, Kenny Young, Tom McGarrity, Thomas Carter, Marisa McClellan, Kim Deibler, Scott Smith, Lisa Wheeler, Noelle Barrett, Allison Vajdic, Amanda Ozenbaugh, George P. Hartwick, III., Julie Reis, Currin Haines-Yoder, Andrea Martin, Sean McCormack, Tamara B. Willis, Erika Martel, Michael Palermo, John F. Cherry, John J. McNally, Matthew P. Smith, Kimberley Kardells, Edward E. Guido, Wayne A. Jacobs, Bridget Whitley, Brad Winnick, Samuel Goldberg, James Schwartzman, Rufus Seth Williams, Larry Krasner, Marlon Osbourne, Stephen Olszewski, and Anna M. Ciardi: for their violation of 18 U.S.C. § 1964(c) ("Federal RICO") and 18 U.S.C. § 1509-1513.)

#### **COUNT IV**

(Plaintiff Hadassah Feinbergs claim against Defendants Ferdinand Cintron, Josh Shapiro, Francis Chardo, Colin Zwally, Michelle Avery, Emily Hoffman, Joshua Young, Jeff Enders, Stephen Libhart, Sally Lupini, Carrie Self, Gabi Williams, Valerie Arkoosh, Vincent Paese, Laval Miller-Wilson, Andrea Bankes, Corey Dickerson, Andrew Bath, Christian Ribec, Adam Young, Lee Ann Tarasi, Robert Martin, Marcie Smith, Eric Smith, Rosa Cruz, Mandjou Sylla, Joshua Appleby, Alyssa Schatz, Kathryn Crowell, Kenny Young, Tom McGarrity, Thomas Carter, Marisa McClellan, Kim Deibler, Scott Smith, Lisa Wheeler, Noelle Barrett, Allison Vajdic, Amanda Ozenbaugh, George P. Hartwick, III., Julie Reis, Currin Haines-Yoder, Andrea Martin, Sean McCormack, Tamara B. Willis, Erika Martel, Michael Palermo, John F. Cherry, John J. McNally, Matthew P. Smith, Kimberley Kardells, Edward E. Guido, Wayne A. Jacobs, Bridget Whitley, Brad Winnick, Sam Goldberg, James Schwartzman, Rufus Seth Williams, Larry Krasner, Marlon Osbourne, Stephen Olszewski, and Anna M. Ciardi: for their violation of 18 U.S.C. § 1964(c) ("Federal RICO") and 18 U.S.C § 872.)

#### **COUNT V**

(Plaintiff Hadassah Feinbergs claim against Defendants Ferdinand Cintron, Josh Shapiro, Francis Chardo, Colin Zwally, Michelle Avery, Emily Hoffman, Joshua Young, Jeff Enders, Stephen Libhart, Sally Lupini, Carrie Self, Gabi Williams, Valerie Arkoosh, Vincent Paese, Laval Miller-Wilson, Andrea Bankes, Corey Dickerson, Andrew Bath, Christian Ribec, Adam Young, Lee Ann Tarasi, Robert Martin, Marcie Smith, Eric Smith, Rosa

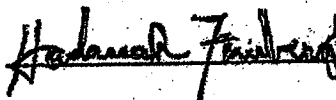
151. Under violations of crimes listed under the Federal Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. § 1964(c)) ("Federal RICO"), Defendants Francis Chardo, esq., Colin Zwally, esq., Michelle Avery, Emily Hoffman, esq., Joshua Young, Esq., Wayne A. Jacobs, Jeff Enders, Stephen Libhart, Sally Lupini, Carrie Self, Gabi Williams, Valerie Arkoosh, Vincent Paese, Laval Miller-Wilson, Andrea Bankes, Corey Dickerson, Andrew Bath, Christian Ribec, Aj Young, Lee Ann Tarasi, Robert Martin, Marcie Smith, Eric Smith, Rosa Cruz, Mandjou Sylla, Joshua Appleby, Alyssa Schatz, Kathryn Crowell, Lenny Young, Tom McGarrity, Thomas Carter, Marisa McClellan, esq., Kim Deibler, Scott Smith, Lisa Wheeler, Noelle Barrett, Allison Vajdic, Amanmda Ozenbaugh, George P. Hartwick III, Julie Reis, Currin Haines Yoder, Gerard M. Karam, esq., Andrea Martin, Sean McCormack, esq., Tamara B. Willis, Erika Martel, Michael Palermo, esq., John F. Cherry, Judge, John J. McNally, Judge, Matthew P. Smith, Judge, Kimberley Kardelis, esq., Edward E. Guido, Judge, Wayne A. Jacobs, and Anna M. Ciardi, have violated local, state, and federal laws and continue to violate and harm the Plaintiffs and numerous other victims through their racket and entity.

152. As a direct result of said Defendants' actions taken Plaintiff Feinberg and her minor children:

- a. enter a judgment based upon treble damages for losses incurred to Plaintiff's person and property.
  - i. that to the extent their actions are found by a jury trial to be criminal in nature, as defined by the Federal "RICO" act,
- b. enter a permanent injunction:
  - i. barring Defendants from engaging in additional organized crimes in response to this lawsuit.
- c. award Plaintiff treble and nominal damages; in the amount of \$10,000,000.
- d. award Plaintiff such additional relief the Court deems just and proper; and
- e. enter a judgment awarding Plaintiff their costs associated with legal fees incurred as a *pro se* litigant pursuant to 42 U.S.C. § 1988.

Dated: June 28, 2024

Respectfully submitted,



Hadassah Feinberg – *Pro Se*  
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Harrisburg, Pa. 17112  
717-571-7021  
H\_feinberg@yahoo.com

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Philadelphia, Pa. 19106

Jeff Enders  
911 Gibson Blvd.  
Steelton, Pa. 17113

Stephen Libhart  
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Harrisburg, Pa. 17101

Department of Human Services for  
Sally Lupini, Carrie Self, Gabi Williams,  
Valerie Arkoosh, Andrea Bankes, Laval Miller-Wilson  
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Vincent Paese  
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16<sup>th</sup> Floor,  
Harrisburg, Pa. 17101

Corey Dickerson  
2 South 2<sup>nd</sup> Street, #3,  
Harrisburg, Pa. 17101

Susquehanna Township Police Department for  
Adam Young, Lee Ann Tarasi, and Robert Martin  
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Harrisburg, Pa. 17110

Marcie Smith and Eric Smith  
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Steelton, Pa. 17061

Rosa Cruz  
63 North 18<sup>th</sup> Street,  
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Mandjou Sylla

Tamara B. Willis  
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Michael Palermo, Esq.  
3300 E. Trindle Rd.,  
Camp Hill, Pa. 17011

John F. Cherry, Judge  
101 Market Street,  
Harrisburg, Pa. 17101

John J. McNally, Judge  
101 Market Street,  
Harrisburg, Pa. 17101

Matthew P. Smith, Judge  
1 Courthouse Square,  
Carlisle, Pa. 17013

Edward E. Guido, Judge  
1 Courthouse Square,  
Carlisle, Pa. 17013

Marion Osbourne  
3561 SW 10th St.  
Pompano Beach, FL 33069

DA Larry Krasner  
3 S Penn Sq,  
Philadelphia, PA 19107

Samuel Goldberg  
130 E 18th St #6G  
New York, NY 10003

Bridget Whitley and Brad Winnick  
101 Market Street,  
Harrisburg, Pa. 17101

IN RE: APPEAL OF DISTRICT  
ATTORNEY'S DENIAL OF HADASSAH  
FEINBERG'S PRIVATE CRIMINAL  
COMPLAINT

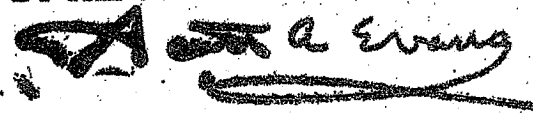
: IN THE COURT OF COMMON PLEAS  
: DAUPHIN COUNTY PENNSYLVANIA

: NO. 805 MD 2024

ORDER

AND NOW, this 24<sup>th</sup> day of May 2024, upon review of the Appeal to Review Denial filed by Hadassah Feinberg on May 9, 2024, and considering that Feinberg has instituted various legal actions against members of This Court, its staff, and Court Administration, it is hereby ORDERED and DIRECTED that the entire Dauphin County bench is recused from this matter. Court Administration is directed to arrange for the appointment of a Judge from outside Dauphin County to preside over all matters and proceedings at this docket.

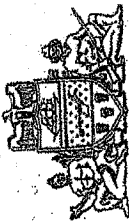
BY THE COURT:



Scott Arthur Evans, President Judge

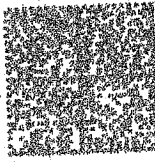
Distribution:

Fran Chardo, Esq., District Attorney's Office  
Colin Zwally, Esq., District Attorney's Office  
Hadassah Feinberg, 102 Carolyn Street, Harrisburg, PA 17112  
Steve Libhart, Court Administrator  
Troy Petery, Deputy Court Administrator



**Bridget M. Whitley, Esq.**  
Clerk of Court  
101 Market Street, Rm. 100  
Harrisburg, Pennsylvania 17101

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FIRST CLASS

*Hadassah Feinberg  
102 Carolyn Street  
Harrisburg PA 17112*

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NOTIFY SENDER OF NEW ADDRESS  
ELECTRONIC MAIL SERVICE



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COMMONWEALTH OF PENNSYLVANIA  
 COUNTY OF PHILADELPHIA



PRIVATE  
 CRIMINAL COMPLAINT

Magisterial District Number:  
 MDJ Name: Hon.  
 Address:  
 Telephone:

COMMONWEALTH OF PENNSYLVANIA  
 VS.

DEFENDANT: NAME and ADDRESS  
 Samuel Goldberg  
 130 E 18th Street,  
 Unit 6G  
 New York, NY 10003  
 (Fill in defendant's name and address)

Docket No:  
 Date Filed:  
 OTN:

(Above to be completed by court personnel)

Notice: Under Pa.R.Crim.P. 506, your complaint may require approval by the attorney for the Commonwealth before it can be accepted by the magisterial district court. If the attorney for the Commonwealth disapproves your complaint, you may petition the court of common pleas for review of the decision of the attorney for the Commonwealth.

Fill in as much information as you have.

Defendant's Race/Ethnicity	Defendant's Sex	Defendant's D.O.B.	Defendant's A.K.A. (also known as)
<input checked="" type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Asian <input type="checkbox"/> Native American <input type="checkbox"/> Hispanic <input type="checkbox"/> Unknown	<input type="checkbox"/> Female <input checked="" type="checkbox"/> Male	January, 1982	Sam Goldberg
		Defendant's Vehicle Information Plate Number      State      Registration Sticker (MM/YY)	

I, Hadassah Feinberg  
(Name of Complainant-Please Print or Type)

do hereby state: (check appropriate box)

- I accuse the above named defendant who lives at the address set forth above  
 I accuse the defendant whose name is unknown to me but who is described as \_\_\_\_\_  
  
 I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe.

with violating the penal laws of the Commonwealth of Pennsylvania at 4601 Flat Rock Rd Unit 603  
(Place-Political Subdivision)

in Philadelphia County on or about January 26, 2011

Participants were: (if there were participants, place their names here, repeating the name of the above defendant)

Samuel Goldberg, James Schwartzman, Marlon Osbourne, and Seth Williams



Defendant's Name: Samuel Goldberg

Docket Number:



PRIVATE  
CRIMINAL COMPLAINT

2. The acts committed by the accused were:  
 (Set forth a summary of the facts sufficient to advise the defendant of the nature of the offense charged. A citation to the statute allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section and subsection of the statute or ordinance allegedly violated.)  
**SEE ATTACHED.**

All of which were against the peace and dignity of the Commonwealth of Pennsylvania and contrary to the Act of Assembly, or in violation of 2502 and a  
(Section) (Subsection)

of the 18  
(PA Statute)

3. I ask that process be issued and that the defendant be required to answer the charges I have made.
4. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

07/09/2024

Date

*Hadassah Feinberg*  
 Signature of Complainant

Office of the Attorney for the Commonwealth  Approved  Disapproved because \_\_\_\_\_

\_\_\_\_\_  
(Name of Attorney for Commonwealth-Please Print or Type)

\_\_\_\_\_  
(Signature of Attorney for Commonwealth)

\_\_\_\_\_  
(Date)

AND NOW, on this date \_\_\_\_\_, I certify that the complaint has been properly completed and verified.

\_\_\_\_\_  
(Magisterial District)

\_\_\_\_\_  
(Issuing Authority)

SEAL



Samuel Goldberg willingly, knowingly, and intentionally committed first degree murder by engaging in multiple acts to fatally harm Ellen Greenberg including stabbing her head, body, and legs with sharp knives, and or other dangerous objects, and strangling her to stop her use of oxygen. Samuel Goldberg also obstructed justice in the criminal investigation by misleading first responders with false statements, and flawed police reports. Samuel Goldberg tampered with physical evidence at the crime scene and moved the body of Ellen Greenberg postmortem. Samuel Goldberg committed an obstruction of justice to conceal Ellen Greenberg's murder pursuant to 18 Pa. C.S. § 5101. Samuel Goldberg willingly, knowingly, and intentionally committed first degree murder pursuant to 18 Pa. C.S. § 2502(a). Samuel Goldberg willingly, knowingly, and intentionally strangled Ellen Greenberg to cause death which is unlawful pursuant to 18 Pa. C.S. § 2718(a)(1).

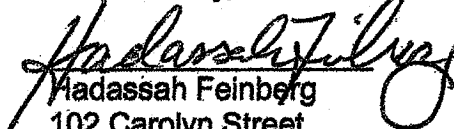
James Schwarzman willingly, knowingly, and intentionally assisted his nephew, Samuel Goldberg, in concealing incriminating evidence found at the crime scene by removing the Ellen Greenberg's electronics from the murder scene on or between January 27, 2011, through February 5, 2011. James Schwartzman obstructed justice in the criminal investigation of the murder even though he had full legal knowledge of his criminal actions as a former Assistant U.S. Attorney for the Eastern District of Pennsylvania, and former law clerk for a federal district judge. James Schwartzman committed an obstruction of justice to conceal Ellen Greenberg's murder pursuant to 18 Pa. C.S. § 5101.

Marlon Osbourne willingly, knowingly, and intentionally assisted the Philadelphia City Police Department in obstructing justice in the criminal investigation by changing Ellen Greenberg's cause of death from a homicide to a murder, when the cause of death was indisputably a horrific murder. Marlon Osbourne committed an obstruction of justice to conceal Ellen Greenberg's murder pursuant to 18 Pa. C.S. § 5101.

Seth Williams willingly, knowingly, and intentionally assisted Samuel Goldberg and James Schwartzman in obstructing justice in the criminal investigation of the murder of Ellen Greenberg in exchange for bribes, favors, and monetary rewards. As district attorney, Seth Williams engaged in criminal misconduct during the criminal investigation of Ellen Greenberg's murder. Seth Williams committed an obstruction of justice to conceal Ellen Greenberg's murder pursuant to 18 Pa. C.S. § 5101.

DATED: July 9, 2024

Submitted by,



Hadassah Feinberg  
102 Carolyn Street  
Harrisburg, Pa. 17112  
(717) 571-7021



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Card Name: VISA  
Account #: XXXXXXXXXXXX1909  
Approval #: 062209  
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PS Form 3800, April 2015 PSN 7530-02-000-9001 See Reverse for Instructions

7022 0410 0000 0852 7152



In the Interest Of:  
Ella Rae Smith a Minor

Docket No. CP- DP- 20  
 FID: -FN- 20  
 County Local No: \_\_\_\_\_

APPLICATION FOR EMERGENCY PROTECTIVE CUSTODY

Name: Hadassah Femberg Address: 102 Carolyn St. Harrisburg, Pa 17112 Phone: 717-571-7021

Name: Ella Rae Smith Age: 4 DOB: 6/18/2020 Sex: Female  
 Address: 503 State St Steelton, Pa 17160  
 Phone Number(s): \_\_\_\_\_ Phone Type: \_\_\_\_\_  
 Race:  Asian/Pacific Islander  Black  Caucasian  Bi-Racial  Native Tribal Affiliation: \_\_\_\_\_  Unknown/Unreported  
 Ethnicity:  Hispanic  Not Hispanic  Unknown

Type of Dependency: The child named above comes within the jurisdiction of the court as defined by The Juvenile Act at 42 Pa.C.S. §6302.

Abuse and/or Neglect:  
 (1) is without proper care or control  
 (2) has been placed for care or adoption in violation of law  
 (3) has been abandoned  
 (4) is without a parent, guardian, or legal custodian  
 (10) is born to a parent whose parental rights with regard to another child have been involuntarily terminated  
 Abuse:  
 The petition alleges that the above named child is a victim of child abuse as defined at 23 Pa.C.S. §6303.

Status Offense:  
 (5) while subject to compulsory school attendance is habitually and without justification truant from school  
 (6) has committed a specific act or acts of habitual disobedience  
 (7) is under the age of ten years and has committed a delinquent act  
 (8) has been formerly adjudicated dependent, and is under the jurisdiction of the court  
 (9) has been referred pursuant to section 6323 (relating to informal adjustment), and who commits an act which is defined as ungovernable in paragraph (6)

Protective Custody:

Child is NOT in Protective Custody  
 Location of the child is: unknown  
 Child remains in home but is in imminent risk of placement in foster care absent preventive services.

Child is in Protective Custody (removed from the home) and under supervision of the county agency  
 Date: \_\_\_\_\_ Time: \_\_\_\_\_  
 Location of the child is: \_\_\_\_\_

Mother's Name: <u>Marcie Gail Smith</u>	Father's Name: <u>Eric Smith</u>	Legal Guardian's or Custodian's Name:
DOB:	DOB:	Relationship: DOB:
Address: <u>503 State St Steelton, Pa 17160</u>	Address: <u>63 N. 18th St Harrisburg, Pa 17103</u>	Address:
Phone Number(s): Phone Type:	Phone Number(s): Phone Type:	Phone Number(s): Phone Type:

Whereabouts Unknown  Whereabouts Unknown  Whereabouts Unknown  
 Closest Relative - If whereabouts unknown for Parents and Guardian  
 Name: Eric Wathin Address: 1130 Fernwood Ave, Camp Hill, PA 17011 Phone Number: 717-695-0488 Relation to Child: Uncle  
 Additional Participants with Relationship to Child (see attached)  
Faye Deetrow

Attorney's Name: \_\_\_\_\_ Address: \_\_\_\_\_  
 Guardian Ad Litem's Name: \_\_\_\_\_ Address: \_\_\_\_\_  
 Supreme Court ID: \_\_\_\_\_ Supreme Court ID: \_\_\_\_\_

In the Interest Of:  
Ella Rae Smith, a Minor

**ADDITIONAL PARTICIPANTS WITH RELATIONSHIP TO CHILD**

[Redacted Header]				
Faye Deetrow		Harrisburg, Pa	717-837- 5281	Close Friend

*Ella Rae Smith* In the Interest Of  
a Minor

To the Honorable Judge of said Court:

Your petitioner avers that it would be contrary to the welfare, safety and health of the child to remain under the care of *Marele Gail Smith*

The facts which support allegations of dependency are:

The child

- 1) is without proper parental care or control, subsistence, education as required by law, or other care or control necessary for his/her physical, mental, or emotional health, or morals; a determination that there is a lack of proper parental care or control may be based upon evidence of conduct by the parent, guardian or custodian that places the health, safety or welfare of the child at risk, including evidence of the parent's, guardian's or other custodian's use of alcohol or a controlled substance that places the health, safety or welfare of the child at risk;
- 2) has been placed for care or adoption in violation of law;
- 3) has been abandoned by his/her parents, guardian or other custodian;
- 4) is without a parent, guardian or other custodian;
- 5) while subject to compulsory school attendance is habitually and without justification truant from school;
- 6) has committed a specific act or acts of habitual disobedience of the reasonable and lawful commands of his/her parent, guardian, or other custodian and who is ungovernable and found to be in need of care, treatment or supervision;
- 7) is under the age of ten and has committed a delinquent act;
- 8) has been formerly adjudicated dependent, and who is under the jurisdiction of the court, subject to its conditions or placements and who commits an act which is defined as ungovernable; or
- 9) has been referred pursuant to an Informal Adjustment and who commits an act which is defined as ungovernable;
- 10) is born to a parent whose parental rights with regard to another child have been involuntarily terminated under 23 Pa.C.S. § 2511 (relating to grounds for involuntary termination) within three years immediately preceding the date of birth of the child and conduct of the parent poses a risk to the health, safety or welfare of the child.

Specifically, on or about (date or time period): *see attached*  
(State the facts supporting the allegations. Attach additional pages if necessary.)

Additional Allegations attached

- Reasonable Efforts were made to prevent the placement of the child and there are no less restrictions.
- Preventive services were not offered due to the necessity for emergency placement. The lack of services was reasonable under the circumstances. This level of effort was reasonable due to the emergency nature of the situation, safety considerations, and circumstances of the family.
- The agency has determined it would pose a risk to the safety of the child or guardian to release the current whereabouts of the child.



In the Interest Of  
Ella Rae Smith a Minor

The Petitioner verifies and acknowledges that the facts set forth in the petition are true and correct to the petitioner's personal knowledge, information, or belief, and that any false statements are subject to penalties of the Crimes Code, 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

Hadasah Lemberg, Esq.  
PETITIONER NAME/TITLE

\_\_\_\_\_  
ATTORNEY NAME

Hadasah Lemberg, Esq.  
PETITIONER SIGNATURE

\_\_\_\_\_  
ATTORNEY SIGNATURE

7/5/2004  
DATE

\_\_\_\_\_  
DATE

IN THE COURT OF COMMON PLEAS  
DAUPHIN COUNTY, PENNSYLVANIA

IN RE: APPLICATION FOR EMERGENCY  
PROTECTIVE CUSTODY

IN THE INTEREST OF:  
ELLA RAE SMITH

DOCKET NO.

JUVENILE DIVISION

APPLICATION FOR EMERGENCY PROTECTIVE CUSTODY

TO THE HONORABLE JUDGE OF SAID COURT:

Your Petitioner avers that it would be contrary to the welfare, safety, and health of the child to remain under the care of Marcie Gail Smith.

The facts which support allegations of dependency are:

1. Ella Rae Smith date of birth 6/18/2020, is without proper parental care or control, subsistence, education as required by law, or other care or control necessary for his/her physical, mental, or emotional health, or morals, a determination that there is a lack of proper parental care or control may be based upon evidence of conduct by the parent, guardian or custodian that places the health, safety or welfare of the child at risk, including evidence of the parents, guardians or other custodians use of alcohol or a controlled substance that places the health, safety or welfare of the child at risk;

a. On October 12, 2023, Marcie Gail Smith, the biological mother of Ella Rae Smith, documented through Facebook messenger that she is without mental health capacity to care for her children and needs to be treated under medical professional treatment to properly perform her parental duties (see Exhibit A).

b. On October 12, 2023, Marcie Gail Smith confirmed that she was under the influence of crack Cocaine in front of multiple witnesses, including but not limited to Rosa Cruz and Christian Ribec (see Exhibit B)

c. Between October 6, 2023, through October 12, 2023, Marcie Gail Smith disregarded her children's need for education, and withheld them from their school for an extended period. The principle of Silver Academy, Samara Sofian, and the Security Officer of the Silver Academy, Tony Frei, confirmed for this Petitioner that the children were absent from October 6, 2023, through October 12, 2023, even though they were not under medical treatment (see EXHIBIT C).

d. On October 12, 2023, the children of Marcie Gail Smith were found in poor condition. The children were unclothed and soiled in feces with lack of bladder control. The Petitioner provided the children with a change of clothing. This was witnessed by numerous individuals including the Petitioner, Christian Ribec, Rosa Cruz, and the children's paternal grandmother. The mother also confirmed the condition of the children on facebook (see EXHIBIT D).

2. Ella Rae Smith has been abandoned by her mother, Marcie Gail Smith, and father, Eric Smith, guardian or other custodian for more than 12 hours when she is too young to supervise herself (see Exhibit E).

a. On October 12, 2023, Marcie Gail Smith abandoned her four young children for at least twelve hours while was intoxicated at a local hotel. The hotel was paid for by Faye Doctrow. (see EXHIBIT F).

3. The petition alleges that Ella Rae Smith is a victim of child abuse as defined at 23 PA. C.S. § 6303.

a. The children were released to the Petitioner from October 12, 2023, through October 17, 2023.

b. On October 12, 2023, Petitioner acknowledged burns and scratches on Eric Smith's and siblings' backs.

c. on October 13, 2023, Petitioner acknowledged permanent ligature/burn marks on the underside of Ella Rae's right wrist, which was evident on its face that it was not an accidental bruise. The scar consists of two thick lines engraved in the child's wrist on her right hand (see EXHIBIT G).

d. Between October 12, 2023, through October 17, 2023, three of the children were without bladder control, including Ella Rae Smith, even though they had previously been toilet trained.

e. Between October 12, 2023, through October 17, 2023, Ella Rae Smith showed fear of water being too hot (see EXHIBIT H).

f. On October 12, 2023, the children showed signs of dehydration and lack of nutrition and were treated by the Petitioner.

g. Between October 2023 through October 17th, 2023, Petitioner acknowledged a large scar to the top of Ella Rae Smith's sibling neckline posterior (see EXHIBIT I)

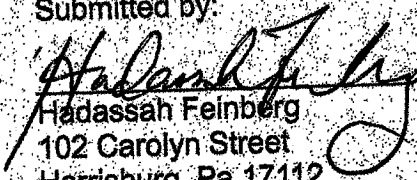
h. Marcie Gail Smith has a history of substance abuse, mental health and domestic violence charges for serious bodily injury and is a continued risk for these children. Marcie Gail Smith has domestic violence charges for serious bodily injury from Upper Allen Township Police Department as a result from her assaulting the children's father (see EXHIBIT J).

I. The children's maternal grandfather, Phillip Wittlin, was a convicted pedophile (see EXHIBIT K).

WHEREFORE, Petitioner avers that it would pose a risk to the safety of the child to keep Ella Rae Smith in the custody of Marcie Gail Smith.

Dated: July 5, 2024

Submitted by:

  
Hadassah Feinberg  
102 Carolyn Street  
Harrisburg, Pa 17112  
(717) 571-7021

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on July 5, 2024, I filed the foregoing

**APPLICATION FOR EMERGENCY PROTECTIVE CUSTODY** by USPS Certified First

Class Mail upon the following individuals:

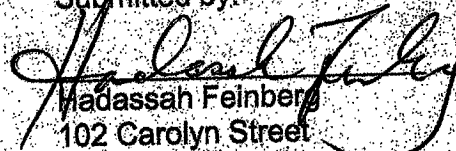
Dauphin County Court of Common Pleas  
Juvenile Division  
101 Market Street  
Harrisburg, Pa. 17101

Marcie Gail Smith  
503 State Street  
Steelton, Pa 17160

Eric Smith  
63 North 18th Street  
Harrisburg, Pa 17103

Dated: July 5, 2024

Submitted by:

  
Madassah Feinberg  
102 Carolyn Street  
Harrisburg, Pa 17112  
(717) 571-7021

**IN THE COURT OF COMMON PLEAS  
DAUPHIN COUNTY, PENNSYLVANIA**

IN RE : APPLICATION FOR EMERGENCY  
PROTECTIVE CUSTODY

: IN THE INTEREST OF:  
: ERICA JEAN SMITH  
:  
:

: JUVENILE DIVISION

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2024, on consideration of the  
PETITIONER, Hadassah Feinberg's Application for Emergency Protective Custody,  
pursuant to 23 Pa. C.S. § 6301 and 23 Pa. C.S. § 6303, this Court ORDERS that the  
Application for Emergency Protective Custody is GRANTED.

BY THE COURT:

\_\_\_\_\_ J

**DISTRIBUTION:**

Hadassah Feinberg  
102 Carolyn Street  
Harrisburg, Pa. 17112

Marcie Gail Smith  
503 State Street  
Steelton, Pa. 17160

Eric Smith  
63 North 18th Street  
Harrisburg, Pa 17103

Magisterial District Judge 09-3-05

Docket Number: MJ-09205-CR-000271-01

Criminal Docket



Commonwealth of Pennsylvania

Magisterial District Judge Mark Mandel

Page 1

<b>Magisterial District:</b>	Magisterial District Judge Mark Mandel	<b>Filed Date:</b>	07/31/2019
<b>ID#:</b>	K258194-0	<b>Case Date:</b>	07/31/2019
<b>Magisterial District:</b>	Upper Allen Township Police Dept	<b>Arrest Date:</b>	08/03/2019
<b>Magisterial District:</b>	08T0190500079	<b>Instem No.:</b>	
<b>County:</b>	Columbia	<b>Disposition Date:</b>	10/11/2019
<b>City/Township:</b>	Columbia	<b>County:</b>	Upper Allen Township

<b>Case Status:</b>	<b>Statute:</b>	<b>Processing Status:</b>
Case	11/18/2019	Case Transferred to Court of Common Pleas
	11/18/2019	Completed
	10/11/2019	Case Balance Due
	10/11/2019	Case Disposed/Finality Received
	10/11/2019	Awaiting Sentencing
	07/31/2019	Awaiting Pretrial Hearing

<b>Case Calendar:</b>	<b>Schedule:</b>	<b>Start Date:</b>	<b>Start Time:</b>	<b>Room:</b>	<b>Judge Name:</b>	<b>Schedule Status:</b>
Summary Hearing	10/11/2019	8:15 am			Magisterial District Judge Columbia 09-3-05, Central Court	Scheduled

<b>ID#:</b>	Smith, Marie Gail	<b>Sex:</b>	Female
<b>Magisterial District:</b>	07201988	<b>Race:</b>	White
<b>Address:</b>	Johnstown, PA 17059		
<b>Waiver of His Right to Apply for Assignment of Counsel?</b>	Yes		
<b>His Counsel Requested by the Defendant?</b>	Yes		
<b>Application Provided for Appointment of Public Defender?</b>	Yes		
<b>Is the Defendant Been Fingerprinted?</b>	Yes		

<b>Magisterial District:</b>	<b>Participant Name:</b>
Magisterial District	DeBarto, Christopher M.
Defendant:	Smith, Marie Gail

19-1200 Printed: 12/28/2022 11:11  
 Records created in the court case system may not be immediately reflected on these docket sheets. Neither the courts of this Unified Judicial System of Pennsylvania nor the Administrative Office of Pennsylvania Courts assumes any liability for errors in or omissions from these docket sheets. Docket sheet information should not be used in place of a criminal history background check, which can only be provided by the Pennsylvania State Police. Employees who do not comply with the provisions of the Criminal History Record Information Act (18 Pa.C.S. Section 9101 et seq.) may be subject to civil liability as set forth in 18 Pa.C.S. Section 9104.



**Magisterial District Judge 12-2-01**

Docket Number: MJ-12201-CR-0000126-21

**Criminal Docket**



Commonwealth of Pennsylvania

Merle Gail Smith

Page 2

Case No.	Charge	Arrest Date	Arresting Agency	Offense Dt.	Disposition
135 8 750-119 89A19	1st Poss Contr Subst By Par Not Reg	02/05/2020		02/05/2020	Waived for Court

**Magisterial District Secretary**  
 Hon. April Leigh Lysaght, Esq.  
 District Judge, Commonwealth of Pennsylvania  
 Judicial Status: Active  
 Judicial Code No.: 419955  
 Phone No.: 717-780-6787  
 Office: Dauphin County Day Office  
 101 Market St.  
 Harrisburg, PA 17101

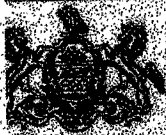
Date	Action	Case	Defendant
02/02/20	Summons Cancelled	Magisterial District Court 12-2-01	Merle Gail Smith, Defendant
02/02/20	Waived for Court	Magisterial District Court 12-2-01	Merle Gail Smith, Defendant
02/02/20	Docket Transmittal Failed	Magisterial District Court 12-2-01	Merle Gail Smith, Defendant
02/02/20	Waiver of Preliminary Hearing	Magisterial District Court 12-2-01	Merle Gail Smith, Defendant
02/02/20	Waiver of Counsel	Magisterial District Court 12-2-01	Merle Gail Smith, Defendant
02/02/20	First Class Summons Accepted	Magisterial District Court 12-2-01	Merle Gail Smith, Defendant
07/20/20	Summons Issued	Magisterial District Court 12-2-01	Merle Gail Smith, Defendant
07/20/20	Criminal Complaint Filed	Magisterial District Court 12-2-01	Merle Gail Smith, Defendant
07/20/20	First Class Summons Issued	Magisterial District Court 12-2-01	Merle Gail Smith, Defendant
07/20/20	Certified Summons Issued	Magisterial District Court 12-2-01	Merle Gail Smith, Defendant

18-1200 Page 2 of 2 Printed: 12/08/2023 11:02  
 Recent entries made in the court filing system may not be immediately reflected on these (check) sheets. Neither the courts of the Unified Judicial System of the Commonwealth of Pennsylvania nor the Registration Office of Pennsylvania Courts assumes any liability for inaccurate or delayed data, errors or omissions on these docket sheets. Docket sheet information should not be used in place of a criminal history background check, which can only be provided by the Pennsylvania State Police. Employees who do not comply with the provisions of the Criminal History Record Information Act (18 Pa.C.S. Section 9101 et seq.) may be subject to civil liability as set forth in 18 Pa.C.S. Section 9183.

**Magisterial District Judge 12-2-01**

Docket Number: MJ-12201-CR-000128-2

**Criminal Doc**



Commonwealth of Pennsylvania  
vs.  
Mercie Gail Smith

Page:

<b>Assigned To:</b>	Michael J. Smith	<b>Issue Date:</b>	02/07/2020
<b>Case No.:</b>	K 817883-0	<b>File Date:</b>	02/07/2020
<b>Issuing Agency:</b>	Smyrna Township Police Dept.	<b>Arrest Date:</b>	
<b>Arrest No.:</b>	200011589	<b>Incident No.:</b>	
<b>Waived for Court:</b>	Waived for Court	<b>Disposition Date:</b>	03/02/2020
<b>Charge:</b>	Daughter	<b>Location:</b>	Smyrna Township
<b>Status:</b>	Closed		

<b>Status:</b>	<b>Status Date:</b>	<b>Disposition Status:</b>
03/02/2020	03/02/2020	Case Transferred to Court of Common Pleas
02/07/2020		Completed
		Awaiting Preliminary Hearing

<b>Calendar:</b>	<b>Schedule:</b>	<b>Start Date:</b>	<b>Room:</b>	<b>Judge Name:</b>	<b>Schedule Status:</b>
Initial Hearing	03/02/2020	11:00 am		Michael J. Smith	Scheduled
Final Arraignment	05/01/2020	9:00 am	Jury Assembly Room	The Honorable Richard A. Latta	Scheduled

<b>Sex:</b>	Smith, Mercie Gail	<b>Sex:</b>	Female
<b>Date of Birth:</b>	07/28/1983	<b>Race:</b>	White

County: PA 17 102

Is the Right to Copy for Assignment of Counsel?	No
Is Counsel Requested by the Defendant?	No
Is Reason Provided for Appointment of Public Defender?	No
Has the Defendant Been Fringed?	Yes

<b>Participant Name:</b>	Smith, Mercie Gail (Fro 86)
<b>Attorney:</b>	Waltz, Patrick L.

<b>Action Type:</b>	<b>Bail Action Date:</b>	<b>Bail Type:</b>	<b>Obtaining Court:</b>	<b>Amount:</b>	<b>Referral Status:</b>
	03/02/2020	Unsecured	Magisterial District Court	\$1,000.00	

§ 1200  
Recent crimes made in the court filing offices may not be immediately reflected on these docket sheets. Further, the courts of the Unified Judicial System of the Commonwealth of Pennsylvania and the Administrative Office of Pennsylvania Courts assumes any liability for inaccuracies for delayed date, errors or omissions on these docket sheets. Docket sheet information should not be used in place of a criminal history background check, which can only be provided by the Pennsylvania State Police. Employees who do not comply with the provisions of the Criminal History Background Information Act (18 Pa.C.S. Section 8107 et seq.) may be subject to civil liability as set forth in 18 Pa.C.S. Section 8108.

## **U**pper Allen Township Police (717-795-2445)

- Marcie Smith, 35, of Upper Allen Township, was charged with simple assault and harassment after a domestic incident about 9 a.m. Jun 19 at her residence. Police said Smith caused significant injury to the victim, which required transportation by EMS to a local hospital. Smith was arrested and arraigned, and she posted \$500 cash bail.

### Today's Visit

School  
Instructional Staff Meeting

### What's next

1. Well Child with  
Tuesday, Nov 10, 1992

### Messages to You and Your Family

### MC Center

Community  
Services  
Development  
Program  
1100 Central  
Expressway  
San Francisco, CA 94133  
Tel: 415/774-2200

18:13

LTE

+1 (717) 329-3279

me to get it

I don't like how evenly spaced they are  
It's no guarantee though.

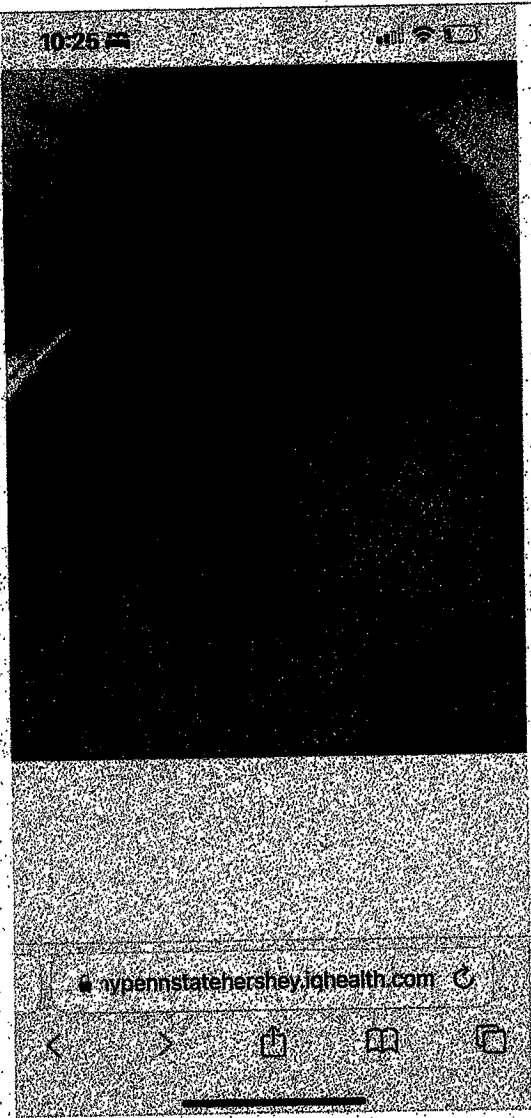
What do you mean by evenly spaced

Like how would evenly spaced be a  
problem



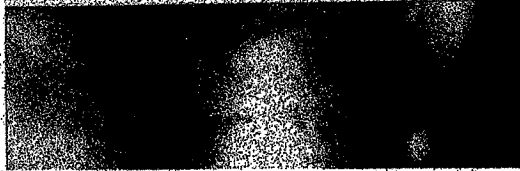
Two lines parallel each other.  
Kinda think that wouldn't happen  
randomly

Oh I see what you mean

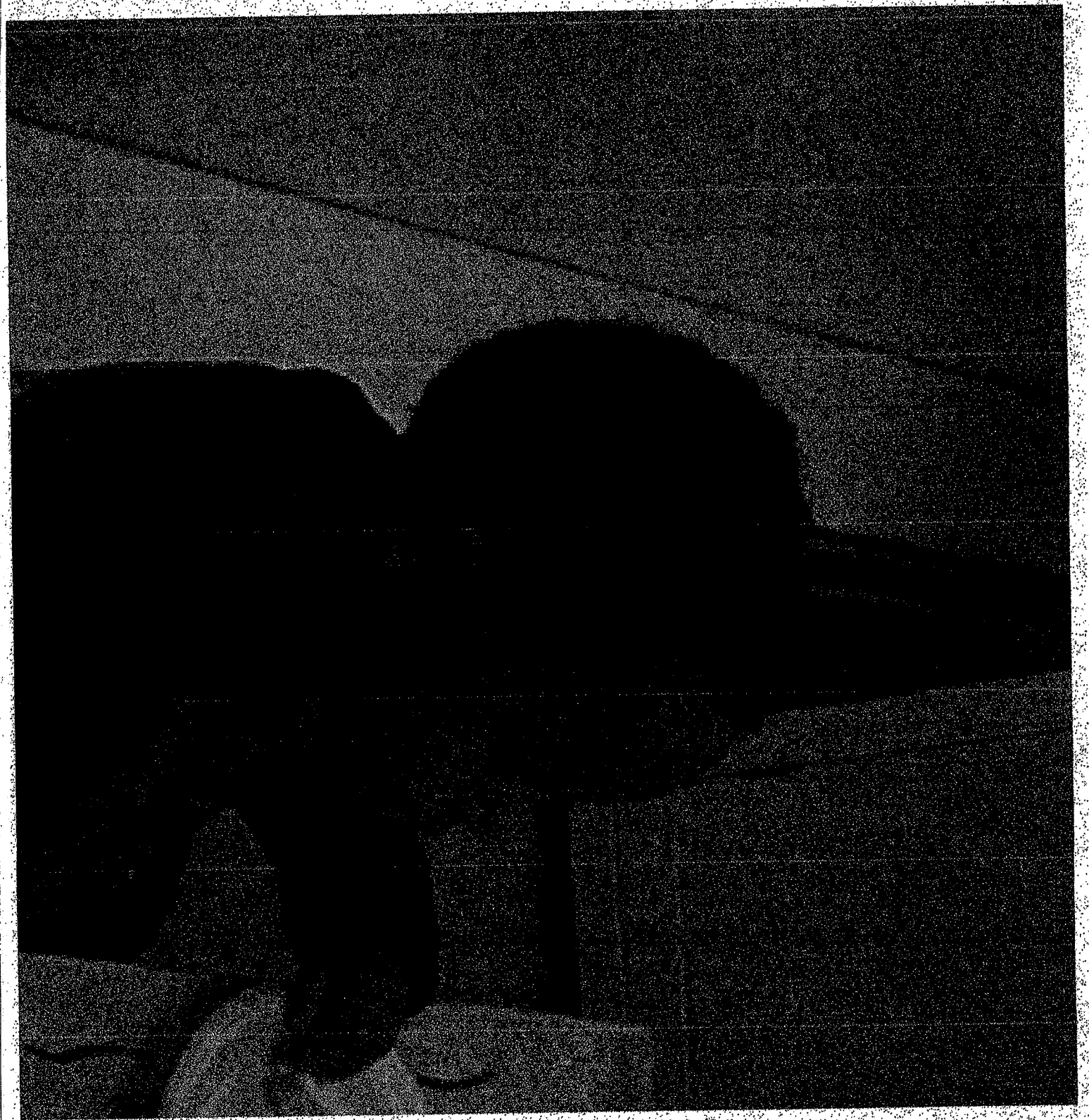




10:24 AM







**COURT OF COMMON PLEAS OF CUMBERLAND COUNTY**



Docket Number: CP-21-CR-000848-2021  
**CRIMINAL DOCKET**  
 Court Case

Commonwealth of Pennsylvania

Page 2 of 2

Marcus G Smith

Date Filed: 07/28/2021, Court Location: Harrisburg, PA 17110

Case Name: Smith, Marcus G.

Smith, Marcus G. Arrest Status: None  
 Bail Agent: Set, Date: 02/24/2020, Bail Type: Unsecured, Originating Court: Magisterial District Court, Bondstage: Amount: \$5,000.00

Sex	Orig. Stat.	Grade	Statute	Statute Description	Offense ID	CTD
M	3	MS	18 P S 3821 85 A	Theft By Unlaw Taking Movable Prop	02/21/2020	0 653415-1

Disposition	Case Event	Disposition Date	Final Disposition
	Lower Court Disposition	02/25/2020	Not Final
	Proceed to Court	04/16/2020	Not Final
	Guilty Plea	02/25/2020	Final Disposition
	Final Court	01/12/2021	MS 18 P S 3821 85 A

Whistle Blower (Lower Court) Defendant Was Present  
 Lower Court Disposition: 02/25/2020, Not Final  
 Proceed to Court: 04/16/2020, Not Final  
 Guilty Plea: 02/25/2020, Final Disposition  
 Final Court: 01/12/2021, MS 18 P S 3821 85 A  
 Sentence: 18 months of 12.00 Months, Supervised for 12.00 Months  
 Defendant to enter into a payment plan through Cumberland County Warrant Collections

Recent entries made in the criminal history may not be immediately reflected on these docket sheets. Neither the courts of the Unified Judicial System of the Commonwealth of Pennsylvania nor the Administrative Office of Pennsylvania Courts assume any liability for inaccuracies or omissions, data, errors or omissions on these reports. Docket Sheet information should not be used in place of a criminal history background check which can only be provided by the Pennsylvania State Police. Moreover, an employer who does not comply with the provisions of the Criminal History Record Information Act may be subject to civil liability as set forth in 42 Pa.C.S. Section 6153.



RIDGEWOOD  
225 COLLEGE DR.  
ORANGE PARK, FL 32065-9998  
(800) 275-8777

07/05/2024 05:21 PM

Product	Qty	Unit Price	Price
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Priority Mail® Harrisburg, PA 17101 Weight: 0 lb 14.10 oz Expected Delivery Date Tue 07/09/2024	1		\$10.75
Insurance Up to \$100.00 included			\$0.00
Certified Mail® Tracking #: 5270 2011 3923 00			\$4.40
<b>Total</b>			\$15.15

First-Class Mail® Large Envelope Harrisburg, PA 17103 Weight: 0 lb 11.70 oz Estimated Delivery Date Tue 07/09/2024	1		\$4.03
Certified Mail® Tracking #: 9589 0710 5270 2011 3923 31			\$8.43
<b>Total</b>			\$4.27

First-Class Mail® Large Envelope Millersburg, PA 17061 Weight: 0 lb 12.50 oz Estimated Delivery Date Tue 07/09/2024	1		\$4.40
Certified Mail® Tracking #: 9588 0710 5270 2011 3923 48			\$8.67
<b>Total</b>			\$32.25

**Grand Total:** \$32.25

Credit Card Remit:  
Card Name: VISA  
Account #: XXXXXXXXXXXX0692  
Approval #: 005680  
Transaction #: 243  
AID: A000000031010  
AL: VISA CREDIT  
Contactless

48 3923 2011 5270 0710 9589

**U.S. Postal Service**  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our Website at [www.usps.com](http://www.usps.com)

**Handwritten:** MARCH SMITH  
500 STATE ST  
HARRISBURG PA 17066

Postmark Here

07/05/2024

Certified Mail Fee \$4.40  
Extra Services & Fees (check box and fee) \$0.00  
Return Receipt (hardcopy) \$0.00  
Return Receipt (electronic) \$0.00  
Certified Mail Restricted Delivery \$0.00  
Adult Signature Required \$0.00  
Adult Signature Restricted Delivery \$0.00

Postage \$4.27

Total Postage and Fees \$8.67

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Adult Signature Required \$0.00  
Adult Signature Restricted Delivery \$0.00

Postage \$4.03

Total Postage and Fees \$8.43

48 3923 2011 5270 0710 9589

**U.S. Postal Service**  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our Website at [www.usps.com](http://www.usps.com)

**Handwritten:** COURT OF COMMON PLEAS  
101 MARKET ST  
HARRISBURG PA 17101

Postmark Here

07/05/2024

Certified Mail Fee \$4.40  
Extra Services & Fees (check box and fee) \$0.00  
Return Receipt (hardcopy) \$0.00  
Return Receipt (electronic) \$0.00  
Certified Mail Restricted Delivery \$0.00  
Adult Signature Required \$0.00  
Adult Signature Restricted Delivery \$0.00

Postage \$10.75

Total Postage and Fees \$15.15

COUNTY OF



PRIVATE CRIMINAL COMPLAINT

COMMONWEALTH OF PENNSYLVANIA VS.

DEFENDANT: NAME and ADDRESS

Governor Joshua Shapiro
508 Main Capitol Building
Harrisburg, Pa 17120

(Fill in defendant's name and address)

Magisterial District Number:
MDJ Name: Hon.
Address:
Telephone:

Docket No:
Date Filed:
OTN:

(Above to be completed by court personnel)

Notice: Under Pa.R.Crim.P. 506, your complaint may require approval by the attorney for the Commonwealth before it can be accepted by the magisterial district court. If the attorney for the Commonwealth disapproves your complaint, you may petition the court of common pleas for review of the decision of the attorney for the Commonwealth.

Fill in as much information as you have.

Table with 4 columns: Defendant's Race/Ethnicity, Defendant's Sex, Defendant's D.O.B., Defendant's A.K.A. (also known as). Includes checkboxes for race and sex, and a section for vehicle information.

I, Hadassah Feinberg

(Name of Complainant-Please Print or Type)

do hereby state: (check appropriate box)

- 1. [X] I accuse the above named defendant who lives at the address set forth above
[ ] I accuse the defendant whose name is unknown to me but who is described as
[ ] I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe.

with violating the penal laws of the Commonwealth of Pennsylvania at 625 Evans City Rd, Butler, PA 16001 (Place-Political Subdivision)

in Butler County on or about July 13, 2024

Participants were: (if there were participants, place their names here, repeating the name of the above defendant)

Governor Joshua Shapiro and other unnamed conspirators.



Attorney's Name:

Address:

Address:

Supreme Court ID:

Supreme Court ID:

In the Interest Of:  
Ella Rae Smith a Minor

**ADDITIONAL PARTICIPANTS WITH RELATIONSHIP TO CHILD**

[Redacted Header]				
Faye Dechow		Harrisburg, Pa	717-837- 5281	Close Friend

*Ella Rae Smith* In the Interest Of  
a Minor

To the Honorable Judge of said Court:

Your petitioner avers that it would be contrary to the welfare, safety and health of the child to remain under the care of *Marcelle Gail Smith*

The facts which support allegations of dependency are:

The child

- 1) is without proper parental care or control, subsistence, education as required by law, or other care or control necessary for his/her physical, mental, or emotional health, or morals; a determination that there is a lack of proper parental care or control may be based upon evidence of conduct by the parent, guardian or custodian that places the health, safety or welfare of the child at risk, including evidence of the parent's, guardian's or other custodian's use of alcohol or a controlled substance that places the health, safety or welfare of the child at risk;
- 2) has been placed for care or adoption in violation of law;
- 3) has been abandoned by his/her parents, guardian or other custodian;
- 4) is without a parent, guardian or other custodian;
- 5) while subject to compulsory school attendance is habitually and without justification truant from school;
- 6) has committed a specific act or acts of habitual disobedience of the reasonable and lawful commands of his/her parent, guardian, or other custodian and who is ungovernable and found to be in need of care, treatment or supervision;
- 7) is under the age of ten and has committed a delinquent act;
- 8) has been formerly adjudicated dependent, and who is under the jurisdiction of the court, subject to its conditions or placements and who commits an act which is defined as ungovernable; or
- 9) has been referred pursuant to an Informal Adjustment and who commits an act which is defined as ungovernable;
- 10) is born to a parent whose parental rights with regard to another child have been involuntarily terminated under 23 Pa.C.S. § 2511 (relating to grounds for involuntary termination) within three years immediately preceding the date of birth of the child and conduct of the parent poses a risk to the health, safety or welfare of the child.

Specifically, on or about (date or time period): *see attached*  
(State the facts supporting the allegations. Attach additional pages if necessary.)

Additional Allegations attached

- Reasonable Efforts were made to prevent the placement of the child and there are no less restrictions.
- Preventive services were not offered due to the necessity for emergency placement. The lack of services was reasonable under the circumstances. This level of effort was reasonable due to the emergency nature of the situation, safety considerations, and circumstances of the family.
- The agency has determined it would pose a risk to the safety of the child or guardian to release the current whereabouts of the child.

In the Interest Of:  
Ella Rae Smith a Minor

The Petitioner verifies and acknowledges that the facts set forth in the petition are true and correct to the petitioner's personal knowledge, information, or belief, and that any false statements are subject to penalties of the Crimes Code, 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

Hadasah Lemberg, B.S.  
PETITIONER NAME/TITLE

\_\_\_\_\_  
ATTORNEY NAME

[Signature]  
PETITIONER SIGNATURE

\_\_\_\_\_  
ATTORNEY SIGNATURE

7/5/2004  
DATE

\_\_\_\_\_  
DATE



**IN THE COURT OF COMMON PLEAS  
DAUPHIN COUNTY, PENNSYLVANIA**

IN RE : APPLICATION FOR EMERGENCY  
PROTECTIVE CUSTODY

IN THE INTEREST OF:  
ELLA RAE SMITH

DOCKET NO.

JUVENILE DIVISION

**APPLICATION FOR EMERGENCY PROTECTIVE CUSTODY**

TO THE HONORABLE JUDGE OF SAID COURT:

Your Petitioner avers that it would be contrary to the welfare, safety, and health of the child to remain under the care of Marcie Gail Smith.

The facts which support allegations of dependency are:

1. Ella Rae Smith date of birth 6/18/2020, is without proper parental care or control, subsistence, education as required by law, or other care or control necessary for his/her physical, mental, or emotional health, or morals, a determination that there is a lack of proper parental care or control may be based upon evidence of conduct by the parent, guardian or custodian that places the health, safety or welfare of the child at risk, including evidence of the parents, guardians or other custodians use of alcohol or a controlled substance that places the health, safety or welfare of the child at risk;

a. On October 12, 2023, Marcie Gail Smith, the biological mother of Ella Rae Smith, documented through Facebook messenger that she is without mental health capacity to care for her children and needs to be treated under medical professional treatment to properly perform her parental duties (see Exhibit A).

b. On October 12, 2023, Marcie Gail Smith confirmed that she was under the influence of crack Cocaine in front of multiple witnesses, including but not limited to Rosa Cruz and Christian Ribec (see Exhibit B)

c. Between October 6, 2023, through October 12, 2023, Marcie Gail Smith disregarded her children's need for education, and withheld them from their school for an extended period. The principle of Silver Academy, Samara Sofian, and the Security Officer of the Silver Academy, Tony Frei, confirmed for this Petitioner that the children were absent from October 6, 2023, through October 12, 2023, even though they were not under medical treatment (see EXHIBIT C).

d. On October 12, 2023, the children of Marcie Gail Smith were found in poor condition. The children were unclothed and soiled in feces with lack of bladder control. The Petitioner provided the children with a change of clothing. This was witnessed by numerous individuals including the Petitioner, Christian Ribec, Rosa Cruz, and the children's paternal grandmother. The mother also confirmed the condition of the children on facebook (see EXHIBIT D).

2. Ella Rae Smith has been abandoned by her mother, Marcie Gail Smith, and father, Eric Smith, guardian or other custodian for more than 12 hours when she is too young to supervise herself (see Exhibit E).

a. On October 12, 2023, Marcie Gail Smith abandoned her four young children for at least twelve hours while was intoxicated at a local hotel. The hotel was paid for by Faye Doctrow. (see EXHIBIT F).

3. The petition alleges that Ella Rae Smith is a victim of child abuse as defined at 23 PA. C.S. § 6303.

a. The children were released to the Petitioner from October 12, 2023, through October 17, 2023.

b. On October 12, 2023, Petitioner acknowledged burns and scratches on Eric Smith's and siblings' backs.

c. on October 13, 2)23, Petitioner acknowledged permanent ligature/burn marks on the underside of Ella Rae's right wrist, which was evident on its face that it was not an accidental bruise. The scar consists of two thick lines engraved in the child's wrist on her right hand (see EXHIBIT G).

d. Between October 12, 2023, through October 17, 2023, three of the children were without bladder control, including Ella Rae Smith, even though they had previously been toilet trained.

e. Between October 12, 2023, through October 17, 2023, Ella Rae Smith showed fear of water being too hot (see EXHIBIT H).

f. On October 12, 2023, the children showed signs of dehydration and lack of nutrition and were treated by the Petitioner.

g. Between October 2023 through October 17th, 2023, Petitioner acknowledged a large scar to the top of Ella Rae Smith's sibling neckline posterior (see EXHIBIT I)

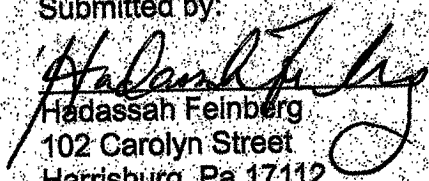
h. Marcie Gail Smith has a history of substance abuse, mental health and domestic violence charges for serious bodily injury and is a continued risk for these children. Marcie Gail Smith has domestic violence charges for serious bodily injury from Upper Allen Township Police Department as a result from her assaulting the children's father (see EXHIBIT J).

I. The children's maternal grandfather, Phillip Witlin, was a convicted pedophile (see EXHIBIT K).

WHEREFORE, Petitioner avers that it would pose a risk to the safety of the child to keep Ella Rae Smith in the custody of Marcie Gail Smith.

Dated: July 5, 2024

Submitted by:

  
Hadassah Feinberg  
102 Carolyn Street  
Harrisburg, Pa 17112  
(717) 571-7021

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on July 5, 2024, I filed the foregoing

**APPLICATION FOR EMERGENCY PROTECTIVE CUSTODY** by USPS Certified First

Class Mail upon the following individuals:

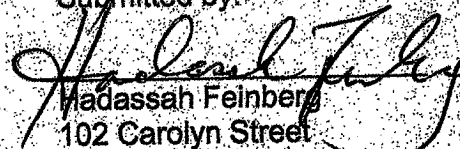
Dauphin County Court of Common Pleas  
Juvenile Division  
101 Market Street  
Harrisburg, Pa. 17101

Marcie Gail Smith  
503 State Street  
Steelton, Pa 17160

Eric Smith  
63 North 18th Street  
Harrisburg, Pa 17103

Dated: July 5, 2024

Submitted by:

  
Madassah Feinberg  
102 Carolyn Street  
Harrisburg, Pa 17112  
(717) 571-7021

**IN THE COURT OF COMMON PLEAS  
DAUPHIN COUNTY, PENNSYLVANIA**

IN RE : APPLICATION FOR EMERGENCY  
PROTECTIVE CUSTODY

:  
: IN THE INTEREST OF:  
: ERICA JEAN SMITH  
:  
:  
:

JUVENILE DIVISION

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2024, on consideration of the  
PETITIONER, Hadassah Feinberg's Application for Emergency Protective Custody,  
pursuant to 23 Pa. C.S. § 6301 and 23 Pa. C.S. § 6303, this Court ORDERS that the  
Application for Emergency Protective Custody is GRANTED.

BY THE COURT:

\_\_\_\_\_ J

**DISTRIBUTION:**

Hadassah Feinberg  
102 Carolyn Street  
Harrisburg, Pa. 17112

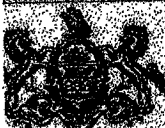
Marcie Gail Smith  
503 State Street  
Steelton, Pa. 17160

Eric Smith  
63 North 18th Street  
Harrisburg, Pa. 17103

**Magisterial District Judge 09-3-05**

Docket Number: MJ-09305-CR-000271-2

**Criminal Doct**



Commonwealth of Pennsylvania  
 v.  
 Marla Gail Smith

Page: 1

<b>Mag. District:</b>	Magisterial District Judge Mark Martin	<b>Issue Date:</b>	07/31/2019
<b>Case No.:</b>	X 288494	<b>File Date:</b>	07/29/2019
<b>County:</b>	Upper Allen Township Police Dept	<b>Arrest Date:</b>	05/03/2019
<b>Case No.:</b>	04T2019050079	<b>Incident No.:</b>	
<b>Location:</b>	County Plaza	<b>Disposition Date:</b>	10/11/2019
<b>City:</b>	Cumberland	<b>Jurisdiction:</b>	Upper Allen Township
<b>Case Status:</b>	Closed		

Case Status	Start Date	Processing Status
Case	11/14/2019	Case Transferred to Court of Common Pleas
	11/14/2019	Completed
	10/11/2019	Case Balance Due
	10/11/2019	Case Disposed/Penalty Imposed
	10/11/2019	Awaiting Sentencing
	07/31/2019	Awaiting Preliminary Hearing

Case Calendar	Schedule Start Date	Start Time	Room	Judge Name	Schedule Status
Summary Hearing	10/11/2019	8:15 am		Magisterial District Judge Cumberland 09-3-05, Pennington Court	Scheduled

<b>DOB:</b>	Smith, Marla Gail	<b>Sex:</b>	Female
<b>SSN:</b>	07281985	<b>Race:</b>	White
<b>Address:</b>	Johnstown, PA 17099		

<b>Waiver of His Right to Apply for Appointment of Counsel?</b>	Yes
<b>His Counsel Requested by the Defendant?</b>	Yes
<b>Petition Presented for Appointment of Public Defender?</b>	Yes
<b>Is the Defendant Been Fingerprinted?</b>	Yes

Defendant Name	Participant Name
Testing Officer	DeSidero, Christopher M.
Defendant	Smith, Marla Gail

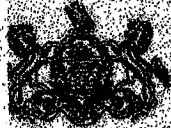
89-1250 Printed: 12/09/2024 11:11

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Magisterial District Judge 12-2-01

Docket Number: MJ-12201-CR-0000128-21

Criminal Docket



Commonwealth of Pennsylvania

vs  
Marble Gail Smith

Page 2

Charge	Grade	Description	Defense Ct.	Disposition
1 33 § 780-118 89A19	M	Int Peace Contr Subst By Par Not Reg	02/05/2020	Waived for Court

Disposition	Disposition Date	Was Defendant Present?
Waived for Court	03/02/2020	Yes

Offense No./Description: 1 Int Peace Contr Subst By Par Not Reg  
 Offense Disposition: Waived for Court

Magisterial District Attorney:  
 Hon. April Leigh Lyssaght, Esq.  
 Professional: Commonwealth of Pennsylvania  
 Judicial Status: Active  
 Judicial Court No.: 319556  
 Date No.: 317-780-6787

Date	Entry	Filed	Applicant
09/20/2021	Summons Completed	Magisterial District Court 12-2-01	Marble Gail Smith, Defendant
10/20/2021	Waived for Court	Michael J. Smith	Marble Gail Smith, Defendant
10/20/2021	Docket Transcription Filed	Magisterial District Court 12-2-01	Marble Gail Smith, Defendant
10/20/2021	Waiver of Preliminary Hearing	Marble Gail Smith	Marble Gail Smith, Defendant
10/20/2021	Waiver of Counsel	Marble Gail Smith	Marble Gail Smith, Defendant
10/20/2021	First Class Summons Accepted	Magisterial District Court 12-2-01	Marble Gail Smith, Defendant
10/20/2021	Summons Issued	Magisterial District Court 12-2-01	Marble Gail Smith, Defendant
10/20/2021	Criminal Complaint Filed	Magisterial District Court 12-2-01	Marble Gail Smith, Defendant
10/20/2021	First Class Summons Issued	Magisterial District Court 12-2-01	Marble Gail Smith, Defendant
10/20/2021	Certified Summons Issued	Magisterial District Court 12-2-01	Marble Gail Smith, Defendant

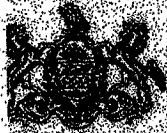
JB 1200 Page 2 of 2 Printed: 12/09/2023 11:59  
 Recent entries made in the court filing system may not be immediately reflected on these docket sheets. Neither the courts of the Unified Judicial System of the Commonwealth of Pennsylvania nor the Administration Office of Pennsylvania Courts assumes any liability for inaccurate or delayed data, errors or omissions on these docket sheets. Docket sheet information should not be used in place of a criminal history background check, which can only be provided by the Pennsylvania State Police. Employees who do not comply with the provisions of the Criminal History Record Information Act, 18 Pa.C.S. Section 9103 et seq. may be subject to civil liability as set forth in 18 Pa.C.S. Section 9183.



**Magisterial District Judge 12-2-01**

Docket Number: MJ12201-CR-000128-2

**Criminal Doc**



Commonwealth of Harris/Venue

vs.  
Merice Gail Smith

Page 1

**Assignment:** Michael J. Smith  
**Case No.:** X-17-088-0  
**Issued Date:** 02/07/2020  
**File Date:** 02/07/2020  
**Using Agency:** Swatara Township Police Dept  
**Arrest Date:**  
**Case No.:** 2020011589  
**Incident No.:**  
**Reason:** Waived for Court  
**Disposition Date:** 03/02/2020  
**Offense:** Assault  
**County:** Dauphin  
**Complaint:**  
**Disposition:** Swatara Township  
**Case Status:** Closed

**Case Status:**  
**Start Date:** 03/02/2020  
**Processing Status:** Case Transferred to Court of Common Pleas  
**End Date:** 03/02/2020  
**Completed:**  
**Next Date:** 03/02/2020  
**Next Event:** Hearing Preliminary Hearing

Case No.	Schedule	Start Time	Room	Judge Name	Schedule Status
03/02/2020	03/02/2020	11:00 am		Michael J. Smith	Scheduled
03/02/2020	03/02/2020	9:00 am	Jury Assembly Room	The Honorable Richard A. Lewis	Scheduled

**Defendant Name:** Smith, Merice Gail  
**Sex:** Female  
**Age:** 46  
**Race:** White

**Residence:** PA 17102  
**Waiver of Right to Apply for Assignment of Counsel?** No  
**Waiver Requested by the Defendant?** No  
**Waiver Provided for Appointment of Public Defender (by Defendant or Friend/Relative)?** Yes

**Defendant Name:** Smith, Merice Gail (Pro Se)  
**Waiver:** Patrick L.

Case No.	Bail Action Date	Bail Type	Charging Court	Amount	Website Status
03/02/2020	03/02/2020	Unsecured	Magisterial District Court	\$1,000.00	Am91

9100 Printed: 12/29/2025 11:00 AM  
 Report errors made in the court filing offices may not be immediately reflected on these docket sheets. Neither the courts of the Unified Judicial System of the Commonwealth of Pennsylvania nor the Administrative Office of Pennsylvania Courts assumes any liability for inaccuracies or omissions on these docket sheets. Docket sheet information should not be used in place of the criminal history background check which can only be provided by the Pennsylvania State Police. Employees who do not comply with the provisions of the Criminal History Background Information Act (18 Pa.C.S. Section 6101 et seq.) may be subject to civil liability as set forth in 18 Pa.C.S. Section 6103.

## **U**pper Allen Township Police (717-795-2445)

- Marcie Smith, 35, of Upper Allen Township, was charged with simple assault and harassment after a domestic incident about 9 a.m. Jun 19 at her residence. Police said Smith caused significant injury to the victim, which required transportation by EMS to a local hospital. Smith was arrested and arraigned, and she posted \$500 cash bail.

### Today's Visit

1. Review of chart notes

### What's next

1. Well Child visit

2. Therapy session

Any time you follow up on a patient's care, you may encounter a patient who has a chronic condition. You may need to refer the patient to a specialist or a support group.

### Changes to Your Medication List

1. Review of chart notes

### MC Case

1. Review of chart notes

2. Review of chart notes

3. Review of chart notes

4. Review of chart notes

5. Review of chart notes

6. Review of chart notes

7. Review of chart notes

8. Review of chart notes

9. Review of chart notes

10. Review of chart notes

11. Review of chart notes

12. Review of chart notes

13. Review of chart notes

14. Review of chart notes

15. Review of chart notes

16. Review of chart notes

17. Review of chart notes

18. Review of chart notes

19. Review of chart notes

20. Review of chart notes

18:13

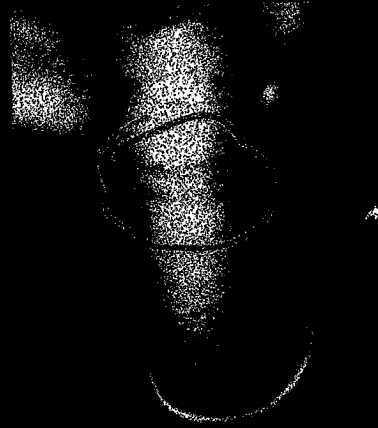
LTE

+1 (717) 329-3279  
me to get it

I don't like how evenly spaced they are  
it's no guarantee though.

What do you mean by evenly spaced

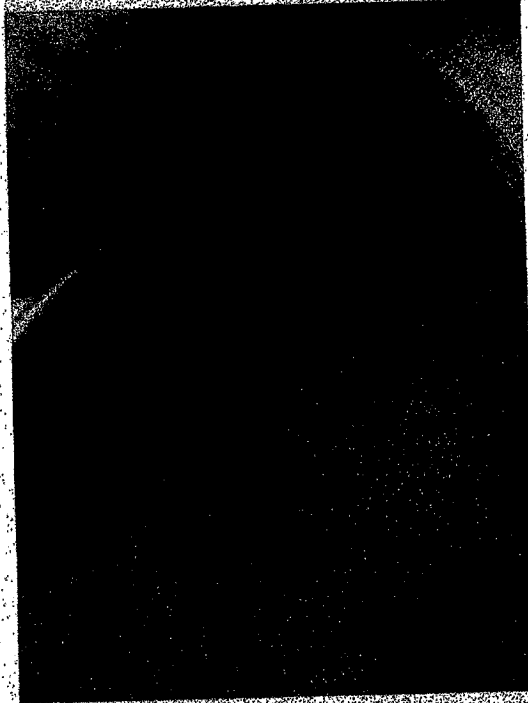
Like how would evenly spaced be a  
problem



Two lines parallel each other.  
Kinda think that wouldn't happen  
randomly

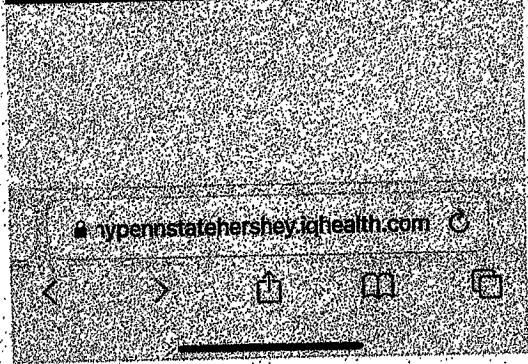
Oh I see what you mean

10:25



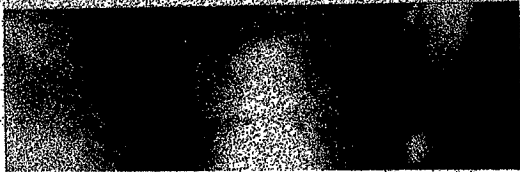
ypennstatehershey.iqhealth.com

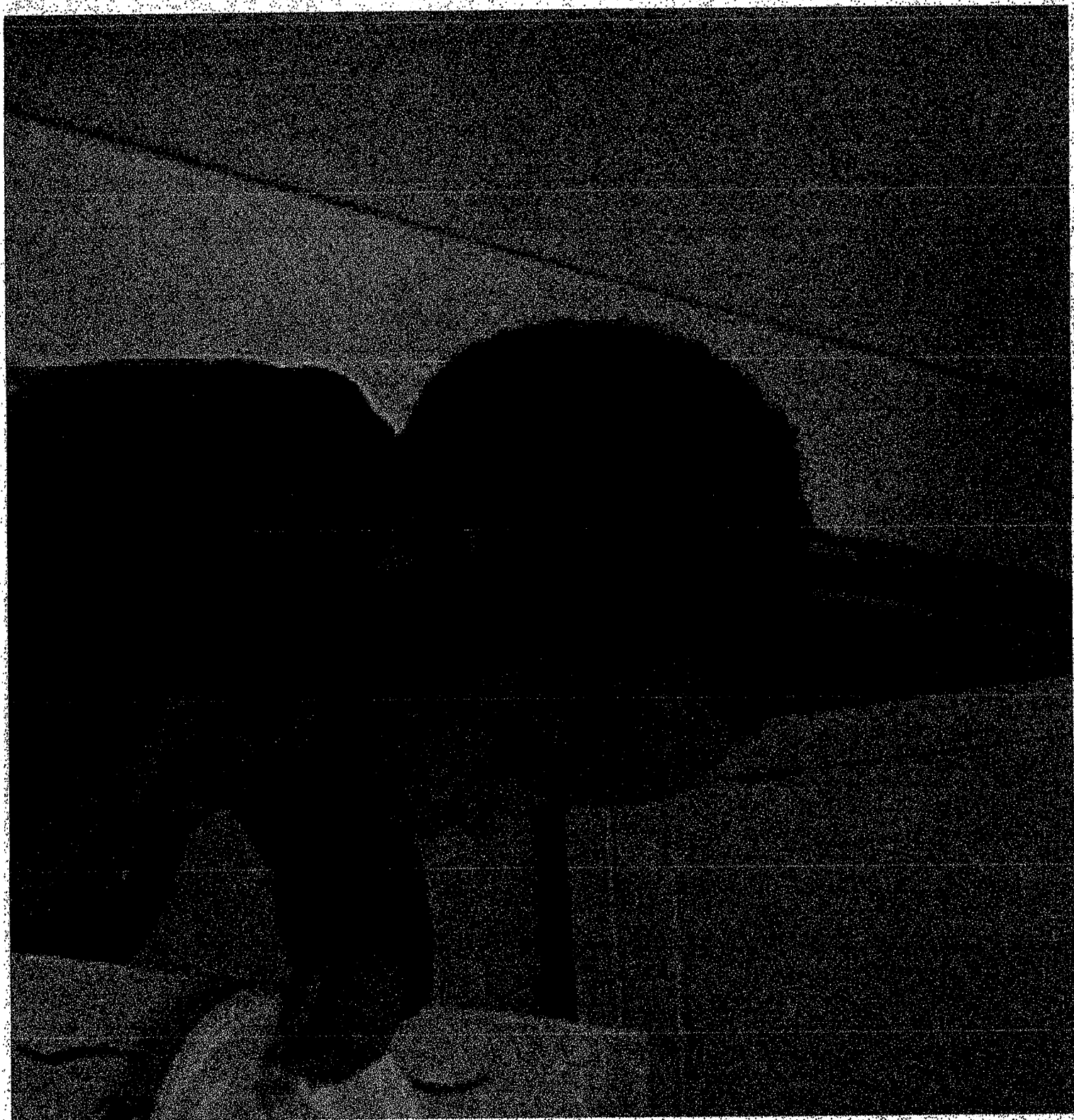




10:24 AM

10:24 AM







**COURT OF COMMON PLEAS OF CUMBERLAND COUNTY**



Docket Number: **CP-21-CR-000844-2021**  
**CRIMINAL DOCKET**  
 Court Case

Commonwealth of Pennsylvania

Page 2 of 2

Marco G. Smith

Date Filed: 07/26/2021 County/City: Cumberland, PA 17110

Participant Type: **None**  
 Defendant: **SMITH, MARCO G.**

Smith, Marco G. Arrest Status: None

Roll Number	Roll	Roll Type	Originating Court	Encumbrance	Amount
54	02/12/2020	Unsecured	Municipal District Court		\$9,000.00

Seq.	Case No.	Grade	Statute	Statute Description	Effective Date	Class
2	3	MS	18 § 3821 (b) A	Theft By Unlaw. Taking Movable Prop.	02/21/2020	U 653315-1

Disposition	Disposition Date	Final Disposition
Case Event	Change Disposition	Guilty - Fined
Suspension/Revocation	Change Disposition	Grant For Time Served
Restorative Justice	Change Disposition	Grant For Time Served
Restorative Justice Program Type	Restorative/Therapeutic Program	Grant For Time Served
Sentence Conditions		Grant For Time Served

Where For Court (Lower Court)	Defendant Was Present	Final Disposition
Lower Court Disposition	02/28/2020	Not Final
Proceed to Court	04/16/2020	Not Final
Information Filed		
Guilty Plea	06/25/2021	Final Disposition
Case Court	Guilty Plea	MS 18 § 3821 (b) A
12 Month By Unlaw. Taking Movable Prop	09/12/2021	
Months, Months	180 or 1200 Months	01/12/2021
Probation	Max of 1200 Months	
	By Payment for Satisfaction	

Defendant to enter into a payment plan through Cumberland County Warrant Collections.

20210902 Printed: 08/09/2021

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RIDGEWOOD  
225 COLLEGE DR.  
ORANGE PARK, FL 32065-9998  
(800)275-8777

07/05/2024 05:21 PM

Product	Qty	Unit Price	Price
Priority Mail® Harrisburg, PA 17101 Weight: 0 lb 14.10 oz Expected Delivery Date Tue 07/09/2024	1		\$10.75
Insurance Up to \$100.00 included			\$0.00
Certified Mail® Tracking #: 5270 2011 3923 00			\$4.40
<b>Total</b>			\$15.15
First-Class Mail® Large Envelope Harrisburg, PA 17103 Weight: 0 lb 11.70 oz Estimated Delivery Date Tue 07/09/2024	1		\$4.03
Certified Mail® Tracking #: 9589 0710 5270 2011 3923 31			\$8.43
<b>Total</b>			\$4.27
First-Class Mail® Large Envelope Millersburg, PA 17061 Weight: 0 lb 12.50 oz Estimated Delivery Date Tue 07/09/2024	1		\$4.40
Certified Mail® Tracking #: 9589 0710 5270 2011 3923 48			\$8.67
<b>Total</b>			\$32.25
<b>Grand Total:</b>			\$32.25

Credit Card Remit  
Card Name: VISA  
Account #: XXXXXXXXXXXX0692  
Approval #: 005680  
Transaction #: 243  
AID: A000000031010  
Contactless  
AL: VISA CREDIT



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