

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

HADASSAH FEINBERG, E.F., A.F.,
E.F., B.F., YVONNE WOLSKI-
WORMAN, PAUL M. WOLSKI, SR. et al

NO. 402 MD 2024

Petitioners

v.

SCOTT EVANS, et al.

Respondents

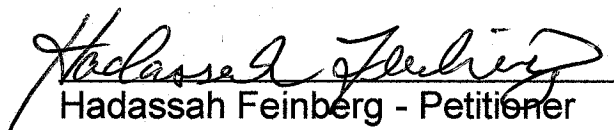
JURY TRIAL DEMANDED

NOTICE TO PLEAD

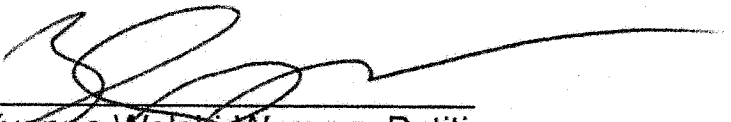
To Respondents: Marlon Osbourne, 3126 Gun Club Rd, West Palm Beach, FL 33406-3005, Seth Williams 1322 S. 26TH Street, Philadelphia, Pa 19146, Patti Sites, 101 Market Street, Harrisburg Pa 17101, Scott Evans, 101 Market Street, Harrisburg Pa 17101, Royce Morris, 101 Market Street, Harrisburg Pa 17101, Scott Smith, 1001 N. 6th Street, Harrisburg, Pa 17102, Marisa McClellan, 1001 N. 6th Street, Harrisburg, Pa 17102, Lisa Wheeler, 1001 N. 6th Street, Harrisburg, Pa 17102, Kim Deibler, 1001 N. 6th Street, Harrisburg, Pa 17102, Noelle Barrett, 1001 N. 6th Street, Harrisburg, Pa 17102, Christopher Wray, 935 Pennsylvania Ave. NW, Washington D.C. 20535, Kenneth Keller, 9325 Discovery Blvd, Manassas, VA 20109, Marcie Smith, 503 State Street, Steelton, Pa 17061, James C. Schwartzman, 1818 Market St, Philadelphia, PA 19103, Samuel Goldberg, 130 E 18th St #6G, New York, NY 10003, Josh Shapiro, 2035 N. Second Street, Harrisburg, Pa. 17102, Christopher De Barrena-Sarobe, 201 West Market Street, Suite 4450, West Chester, PA 19380, William P. Mahon 313 West Market Street, West Chester, PA 19380, Robin Kennedy, 101 Market Street, Harrisburg, pa 17101, Emmy Hockenberry, 101 Market Street, Harrisburg, Pa 17101, Aminah McCraw, 101 Market Street, Harrisburg, Pa 17101, Jacqueline C. Romero, 615 Chestnut Street Suite 1250, Philadelphia, Pa 19106, David Quain, 400 N Broad St, Philadelphia, PA 19130, Kamian Schwartzman, 421 N. Ithan Ave. Bryn Mawr, Pa 19010 Francis Chardo, 101 Market Street, Harrisburg, Pa. 17101, Colin Zwally

101 Market Street, Harrisburg, Pa. 17101, Joseph R. Podroza, 3405 West Chester Pike, Newtown Square, PA 19073, Donald L Carmelite, 707 Highlands Path, York, PA 17402, Kathryn Crowell, 500 University Drive, Hershey, Pa. 17033, Kimberly A. Boyer-Cohen, 3414 Warden Drive, Philadelphia Pa. 19129, Sam P. Gulino, 400 N Broad St, Philadelphia, PA 19130, Scott Meier, 1900 Linglestown Rd. Harrisburg, Pa 17110, Aaron Osman, 1900 Linglestown Rd. Harrisburg, Pa 17110, Christopher Paris, 1800 Elmerton Ave, Harrisburg Pa 17110, Michael D. Myers, 1800 Elmerton Ave, Harrisburg Pa 17110, Wayne A. Jacobs, 600 Arch Street, 8th Floor, Philadelphia, PA 19106, Lee Ann Tarasi, 1900 Linglestown Rd., Harrisburg, Pa 17110, Robert Martin, 1900 Linglestown Rd., Harrisburg, Pa 17110, Adam Young, 1900 Linglestown Rd., Harrisburg, Pa 17110, Gabi Williams, P.O. Box 2675, Harrisburg PA 17105-2675, Valerie Arkoosh, P.O. Box 2675, Harrisburg PA 17105-2675, Anna M. Ciardi, 437 Grant St, Pittsburgh, PA 15219, James Dellafiora, 1425 Arch Street, 4th floor Philadelphia, PA 19102, Larry Krasner, 1425 Arch Street, 4th floor Philadelphia, PA 19102, Andrea Cardemone, 313 West Market Street, West Chester, PA 19380, Nancy Barrasse, 224 Adams Ave, Scranton, PA 18503.

You are hereby notified to file a written response to the enclosed (name of pleading) within twenty (20) days from service hereof or a judgment may be entered against you.



Hadassah Feinberg - Petitioner
E.F., a minor, by and through her
parent, Hadassah Feinberg - Petitioner
A.F., a minor, by and through his
parent, Hadassah Feinberg- Petitioner
E.F., a minor, by and through her
parent, Hadassah Feinberg- Petitioner
B.F., a minor, by and through his
parent, Hadassah Feinberg - Petitioner
P.O. Box 745
Penney Farms, Fl 32079
(352) 514-5335
h_feinberg@yahoo.com



Yvonne Wolski-Worman-Petitioner
Paul M. Wolski, Sr *an alleged incapacitated
person, by and through his prior
guardian and sister, Yvonne Wolski-Worman,
Petitioner*

231 Pa. Code r. 1361

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

HADASSAH FEINBERG, E.F., A.F.,
E.F., B.F., YVONNE WOLSKI-
WORMAN, PAUL M. WOLSKI, SR. et al :

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NO. 402 MD 2024

JURY TRIAL DEMANDED

**PETITIONERS CONSOLIDATED AMENDED PETITION FOR REVIEW
FOR INJUNCTIVE, COMPENSATORY, PUNITIVE RELIEF AND
DAMAGES**

AND NOW comes Petitioners, Hadassah Feinberg, *pro se*, E.F., a minor, by and through her parent, Hadassah Feinberg, A.F., a minor, by and through his parent, Hadassah Feinberg, E.F., a minor, by and through her parent, Hadassah Feinberg, B.F., a minor, by and through his parent, Hadassah Feinberg, Yvonne Wolski-Worman, *pro se*, and Petitioner, Paul M. Wolski, Sr. *an alleged incapacitated person*, by and through his sister, Yvonne Wolski-Worman, and collectively file a Consolidated Amended Petition in response to Respondents Preliminary Objections dated November 18, 2024 through December 6, 2024, and in support thereof aver as follows:

1. Petitioners, Hadassah Feinberg, *pro se*, and Yvonne Wolski-Worman, *pro se, pro se*, collectively initiated this action on August 25, 2024. The four minor children of Petitioner Feinberg are being added as co-plaintiffs to this Petition as follows: E.F., *a minor, by and through her parent, Hadassah Feinberg*, A.F., *a minor, by and through his parent, Hadassah Feinberg*, E.F., *a minor, by and through her parent, Hadassah Feinberg*, B.F., *a minor, by and through his parent, Hadassah Feinberg*. Paul M. Wolski, Sr. is also being added as *an alleged incapacitated person, by and through his sister*, Yvonne Wolski-Worman, is also being added as a co-plaintiff.

2. On November 18, 2024, Respondents Evans, Mahon, Morris, McNally, Ciardi, Hockenberry, and McGraw, in their official capacity, by and through counsel, filed Preliminary Objections to dismiss this case with Prejudice for allegedly "failing to state a claim" and allegedly being "barred by judicial, quasi-judicial, prosecutorial, and sovereign immunities", which is collectively disputed by Petitioners Feinberg and Wolski-Worman.

3. An Amended Petition, can be filed as of course, pursuant to 231 Pa. Code § 1028(c)(1) which states:

A party may file an amended pleading as of course within twenty days after service of a copy of preliminary objections.

If a party has filed an amended pleading as of course, the preliminary objections to the original pleading shall be deemed

moot.; *Diop v. Bureau of Pro. And Occupational Affairs, State Bd. of Cosmetology*, 272 A.3d 548, 554 n.7 (Pa. Cmwlth. 2022).

4. While state actors share some benefits of immunity protections, they are not immune from criminal acts, such as RICO crimes, including fraud, intimidation of witnesses, public corruption, extortion, or any other crimes and therefore this Court has a duty to review this Petition, which brings forth these claims.

5. In addition, the Supreme Court has held that, "A Court must make reasonable allowances to protect *pro se* litigants from the inadvertent forfeiture of important rights due merely to their lack of legal training" (*Garrett*, 938 F. 3d at 92 (quoting *Erickson v. Pardus*, 551 U.S. 89, 94 (2007))

6. Petitioners have been irrefutably harmed inside and outside of multiple courts, departments, and agencies, across multiple counties, in the Pennsylvania Commonwealth. The Respondents have continuously engaged in criminal conduct, public corruption, obstruction of justice, mail fraud, attorney misconduct, judicial misconduct, kidnapping, restraining, false testimony, legal abuse, abuse of authority, and defamation. They have violated all seven Petitioners civil rights, "unalienable rights", and have discriminated against the Petitioners disabilities.

7. The Respondents unlawfully harmed and carried out their crimes against all seven Petitioners and thousands of other victims, some victims incorporated herein, by operating under a clearly established Enterprise of organized criminal racketeering in the Pennsylvania Commonwealth. The Enterprise established is the "Pennsylvania Commonwealth." It has been ongoing and been operating by the majority of the Respondents for at least ten years, for profit.

8. The Respondents are engaged in an irrefutable pattern of strategical organized crime and the claims brought herein are factual, legally sound, and supported by overwhelming physical evidence. The claims have merit to be heard by a Court of law and should not be dismissed, absent a jury trial. Organized Crime by an Enterprise of Racketeering is a violation of the laws in the Pennsylvania Commonwealth pursuant to 18 Pa. Code § 911:

The General Assembly finds that:

(1) organized crime is a highly sophisticated, diversified, and widespread phenomenon which annually drains billions of dollars from the national economy by various patterns of unlawful conduct including the illegal use of force, fraud, and corruption.

(2) organized crime exists on a large scale within the Commonwealth of Pennsylvania, engaging in the same patterns of unlawful conduct which characterize its activities nationally.

(3) the vast amounts of money and power accumulated by organized crime are increasingly used to infiltrate and corrupt legitimate businesses operating within the Commonwealth, together with all of the techniques of violence, intimidation, and

other forms of unlawful conduct through which such money and power are derived.

(d) Civil remedies. --

(1) The several courts of common pleas, and the Commonwealth Court, shall have jurisdiction to prevent and restrain violations of subsection (b) of this section by issuing appropriate orders, including but not limited to:

(i) ordering any person to divest himself of any interest direct or indirect, in the enterprise; imposing reasonable restrictions on the future activities or investments of any person, including but not limited to, prohibiting any person from engaging in the same type of endeavor as the enterprise engaged in; and

(ii) making due provision for the rights of innocent persons, ordering the dissolution of the enterprise, ordering the denial, suspension or revocation of charters of domestic corporations, certificates of authority authorizing foreign corporations to do business within the Commonwealth of Pennsylvania, licenses, permits, or prior approval granted to any enterprise by any department or agency of the Commonwealth of Pennsylvania; or prohibiting the enterprise from engaging in any business.

(2) In any proceeding under this subsection, the court shall proceed as soon as practicable to the hearing and determination thereof. Pending final determination, the court may enter preliminary or special injunctions, or take such other actions, including the acceptance of satisfactory performance bonds, as it may deem proper.

(3) A final judgment or decree rendered in favor of the Commonwealth of Pennsylvania in any criminal proceeding under this section shall estop the defendant from denying the essential allegations of the criminal offense in any subsequent civil proceeding under this subsection.

(4) Proceedings under this subsection, at pretrial, trial and appellate levels, shall be governed by the Pennsylvania Rules of Civil Procedure and all other rules and procedures relating to civil actions, except to the extent inconsistent with the provisions of this section.

PARTIES

9. Petitioner, Hadassah Feinberg, is a prior resident of Dauphin and Cumberland County, Pennsylvania. In Dauphin County, Petitioner owned her home located at 3807 Bonnyview Rd. Harrisburg, Pa. 17109. Her current mailing address is P.O. Box 745, Penney Farms, Fl. 32079.

Petitioner was forced to relocate out of State due to public corruption by Respondents in 2023. Her current address is redacted through a Florida Court.

10. Petitioner E.F., *a minor, by and through her parent, Hadassah Feinberg*, is a prior resident of Dauphin and Cumberland County, Pennsylvania. In Dauphin County, E.F. resided at 3807 Bonnyview Rd. Harrisburg, Pa. 17109. Her current mailing address is P.O. Box 745, Penney Farms, Fl. 32079. Petitioner was forced to relocate out of State due to public corruption by Respondents in 2023. Her current address is redacted through a Florida Court.

11. Petitioner, A.F., *a minor, by and through his parent, Hadassah Feinberg*, is a prior resident of Dauphin and Cumberland County, Pennsylvania. In Dauphin County, A.F. resided at 3807 Bonnyview Rd. Harrisburg, Pa. 17109. His current mailing address is P.O. Box 745, Penney Farms, Fl. 32079. Petitioner was forced to relocate out of State due

to public corruption by Respondents in 2023. His current address is redacted through a Florida Court.

12. Petitioner, E.F., *a minor, by and through her parent, Hadassah Feinberg*, is a prior resident of Dauphin and Cumberland County, Pennsylvania. In Dauphin County, E.F. resided at 3807 Bonnyview Rd. Harrisburg, Pa. 17109. Her current mailing address is P.O. Box 745, Penney Farms, Fl. 32079. Petitioner was forced to relocate out of State due to public corruption by Respondents in 2023. Her current address is redacted through a Florida Court.

13. Petitioner, B.F., *a minor, by and through his parent, Hadassah Feinberg*, is a prior resident of Dauphin and Cumberland County, Pennsylvania. In Dauphin County, A.F. resided at 3807 Bonnyview Rd. Harrisburg, Pa. 17109. His current mailing address is P.O. Box 745, Penney Farms, Fl. 32079. Petitioner was forced to relocate out of State due to public corruption by Respondents in 2023. His current address is redacted through a Florida Court.

14. Petitioner, Yvonne Wolski-Worman, is a prior resident of Northampton County, Pennsylvania, located at 2349 Yost Road, Bath, Pa 18014. Petitioner relocated out of state, and her address is redacted for safety.

15. Petitioner, Paul M. Wolski, Sr. *an alleged incapacitated individual, by and through his guardian, Yvonne Wolski-Worman, Petitioner*, is a prior resident of Northampton County, Pennsylvania. Petitioner is being held against his will in Guardianship through public abuse of the officials.

16. Respondent Marlon Osbourne resides at 3126 Gun Club Rd, West Palm Beach, FL 33406-3005.

17. Respondent Seth Williams resides at 1322 S. 26TH Street, Philadelphia, Pa 19146.

18. Respondent Patti Sites is acting Clerk of Court for the Dauphin County Court of Common Pleas located at 101 Market Street, Harrisburg, Pa 17101.

19. Respondent Scott Evans, is a President Judge for the Dauphin County Court of Common Pleas. He is located at 101 Market Street, Harrisburg, Pa 17101.

20. Respondent Scott Smith, is a caseworker at Dauphin County Children and Youth Agency located at 1001 North 6th Street, Harrisburg, Pa. 17101.

21. Respondent Kenneth Keller is a Special Agent for the FBI Manassas, Va, office located at 9325 Discovery Blvd, Manassas, VA 20109.

22. Respondent Marisa McClellan, is a caseworker at the Dauphin County Children and Youth Service Agency, located at 1001 North 6th Street, Harrisburg, Pa. 17101.
23. Respondent Marcie Smith, is a resident of Dauphin County and her address is 503 State Street, Steelton, Pa. 17061.
24. Respondent Lisa Wheeler is a caseworker at the Dauphin County Children and Youth Service Agency, located at 1001 North 6th Street, Harrisburg, Pa. 17101.
25. Respondent Noelle Barrett, is a caseworker at the Dauphin County Children and Youth Service Agency, located at 1001 North 6th Street, Harrisburg, Pa. 17101.
26. Respondent Kim Deibler, is a caseworker at the Dauphin County Children and Youth Service Agency, located at 1001 North 6th Street, Harrisburg, Pa. 17101 in her personal, individual, and official capacities.
27. Respondent James Schwartzman, a prior judge of the Pennsylvania Supreme Court Disciplinary Board is located at 1818 Market St, Philadelphia, PA 19103.
28. Respondent Samuel Goldberg is located at *130 E 18th St #6G New York, NY 10003.*

29. Respondent Joshua Shapiro, is the acting Governor for the State of Pennsylvania located at 2035 N. Second Street, Harrisburg, Pa. 17102.
30. Respondent Christopher De Barrena-Sarobe is the acting District Attorney for Chester County, Pennsylvania located at *201 West Market Street, Suite 4450. West Chester, PA 19380.*
31. Respondent William P. Mahon is the Senior Judge of the Chester County Court of Common Pleas, located at *313 West Market Street West Chester, PA 19380.*
32. Respondent Robin Kennedy, is the Dauphin County Clerk of Court, located at 101 Market Street, Harrisburg, Pa 17101.
33. Claims against Respondent Hon. John J. McNally are being dismissed by Petitioners, in this Amended Petition.
34. Respondent Jacqueline C. Romero is the U.S. Attorney for the Pennsylvania Eastern District located at 615 Chestnut Street Suite 1250, Philadelphia, Pa 19106.
35. Respondent Gerard A. Karam is a U.S. Attorney for the Pennsylvania Middle District located at *321 Spruce Street, Scranton, PA 18503.*
36. Respondent David Quain is a former employee for the Philadelphia Medical Examiners office located at 400 N Broad St, Philadelphia, PA 19130.

37. Respondent Kamian Schwartzman is a licensed attorney in Philadelphia County located at 421 n Ithan Ave. Bryn Mawr, Pa 19010.
38. Respondent Francis Chardo is the acting District Attorney for Dauphin County, Pennsylvania located at 101 Market Street, Harrisburg, Pa. 17101.
39. Claims against Respondent Richard A. Goldinger are being dismissed by Petitioners, in this Amended Petition.
40. Respondent Joseph R. Padroza is a licensed attorney with the Lamb and Macerlaine firm located at 3405 West Chester Pike, Newtown Square, PA 19073.
41. Respondent Donald L. Carmelite is a licensed attorney for the Marshall Dennehey Law firm located at *707 Highlands Path York, PA 17402.*
42. Respondent Kathryn Crowell is a licensed physician with Penn State Hershey Hospital located at 500 University Drive, Hershey, Pa. 17033.
43. Respondent Kimberly A. Boyer- Cohen is a licensed attorney for the Marshall Dennehey Law firm. She resides at 3414 Warden Drive, Philadelphia Pa. 19129.
44. Respondent Sam P. Gulino was a Philadelphia Medical Examiner located at 400 N Broad St, Philadelphia, PA 19130.

45. Respondent Aminah McCraw is the law Clerk for Honorable Royce Morris located at 101 Market Street Harrisburg, Pa 17101.
46. Respondent Emmy Hockenberry is the Court Administrator at the Dauphin County Court of Common Pleas located at 101 Market Street Harrisburg, Pa 17101.
47. Respondent Royce Morris is a Judge at the Dauphin County Court of Common Pleas located at 101 Market Street Harrisburg, Pa 17101.
48. Respondent Scott Meier is a Detective for the Susquehanna Township Police Department located at 1900 Linglestown Rd. Harrisburg, Pa 17110.
49. Respondent Aaron Osman is a Sergeant for the Susquehanna Township Police Department located at 1900 Linglestown Rd. Harrisburg, Pa 17110.
50. Respondent Christopher Paris is the Commissioner for the Pennsylvania State Police located at 1800 Elmerton Ave, Harrisburg Pa 17110.
51. Respondent Michael D. Myers works for the Pennsylvania State police located at 1800 Elmerton Ave, Harrisburg Pa 17110.
52. Respondent Wayne A. Jacobs directs the Philadelphia FBI William J. Green Jr. Building 600 Arch Street, 8th Floor Philadelphia, PA 19106.

53. Respondent Lee Ann Tarasi is a Detective at Susquehanna Township Police Department located at 1900 Linglestown Road, Harrisburg, Pa 17110.
54. Respondent Robert A. Martin is a Chief of Police at Susquehanna Township Police Department located at 1900 Linglestown Road, Harrisburg, Pa 17110.
55. Respondent Adam Young is a Law Enforcement Officer at Susquehanna Township Police Department located at 1900 Linglestown Road, Harrisburg, Pa 17110.
56. Respondent Gabi Williams is a Director of the Pennsylvania Department of Human Services located at P.O. Box 2675 Harrisburg PA 17105-2675.
57. Respondent Valerie Arkoosh is a Director of the Pennsylvania Department of Human Services located at. P.O. Box 2675 Harrisburg PA 17105.
58. Respondent Anna M. Ciardi is a licensed attorney for the Pennsylvania Supreme Court Disciplinary Board located at 437 Grant St, Pittsburgh, PA 15219.
59. Respondent Colin Zwally is an Assistant District Attorney for Dauphin County, Pennsylvania located at 101 Market Street, Harrisburg, Pa. 17101.

60. Respondent Andrea Cardemone works at the Chester County District Attorney's Office located at 201 W. Market St., Suite 4450 West Chester, PA 19382.

61. Respondent Larry Krasner is the Philadelphia District Attorney located at 3 S Penn Square, Philadelphia, PA 19107.

62. Respondent Christopher Wray was a Director of the Federal Bureau of Investigation located at 935 Pennsylvania Ave. NW Washington D.C. 20535.

63. Respondent Nancy Barrasse, a licensed attorney is located at 224 Adams Ave, Scranton, PA 18503.

FACTUAL HISTORY

64. On October 12, 2023, Marcie Gail Smith abandoned her four young children at 63 North 18th Street, Harrisburg, Pa. 17103. Petitioner Hadassah Feinberg notified Harrisburg Police and the Smith children were found unclothed and soiled in feces. Respondents Noelle Barrette, Marisa McClellan, Lisa Wheeler, Scott Smith, and Kim Deibler refused to respond to the scene. **(Exhibit A USB)**

65. Petitioner Hadassah Feinberg, cared for the Smith children for five days in her Dauphin County home.

66. On October 13, 2023, the Smith children were diagnosed with suspected child abuse by UPMC. A police report and ChildLine referral were made. **(Exhibit B)**

67. On October 16, 2023, a dispute arose between Petitioner Feinberg and Respondents Dauphin County Children and Youth Employees regarding the agency for kinship. Petitioner Feinberg filed a complaint to OCYF and Respondent Shapiro. **(Exhibit C)**

68. On October 17, 2023, Petitioner Feinberg took three Smith children to Penn State Hershey Emergency Room due to ongoing medical concerns with head banging and neurological concerns, primarily with E.S. and E.R.S. E.S. was injuring himself and E.R.S had parallel burns on her wrist. During the visit, Respondent Crowell confiscated medical documents which Petitioner Feinberg obtained from UPMC, colluded with Respondents Deibler, McClellan and their agency to cover up the abuse, threatened and defamed Petitioner Feinberg during the hospital visit and afterwards, filed false documents on an official court record, obstructed justice in a child abuse investigation with law enforcement and BEI, endangered the Smith children, and engaged in public corruption with Dauphin County employees. Their actions caused significant harm and injury for Petitioner Feinberg and her four children. **(Exhibit D)**

69. Respondent Deibler threatened Petitioner Feinberg over the phone at the hospital in collusion with Respondent Crowell and her medical team and placed the Smith children back in the care of their biological mother, Marcie Gail Smith, who was under the influence of illegal substances, admittedly suffering with mental health and unable to care for her four children's basic needs and had abandoned all four children five days prior in horrific condition. Marcie Gail Smith had previously been charged for domestic violence for serious bodily injury in 2018 and the Respondents disregarded it. (**Exhibit E**).

70. At some point, Respondents filed a Dependency Petition against Marcie Gail Smith which intentionally omitted the child abuse and neglect simply stating that she was homeless. They did not address the ongoing physical abuse, substance abuse, and abandonment of the children on October 12, 2023. Such tactic was used so as not to incriminate themselves for their neglect of the Smith children. (**Exhibit F**).

71. On November 3, 2023, Respondents McClellan, Wheeler, and Scott Smith falsified documents and filed a Dependency Petition against Petitioner Feinberg. It was dismissed shortly thereafter by Cumberland County. In their Petition they defamed Petitioner stating that "no hospital had indicated the Smith children with abuse" and inferences that Petitioner

Feinberg was mentally unfit to care for her own children. They falsified statements about Petitioner's children and used Respondent Crowell and Respondent Young to collude against Petitioner Feinberg. They made false statements on official record defrauding the court, and wrongfully kidnapped Petitioner Feinberg's four children for a period of thirteen days. Respondents Adam Young and Scott Smith, unlawfully stalked Petitioner in her Dauphin County home and her children's schools for approximately a week, causing significant trauma, unwarranted fear, resulting in permanent displacement and medical injury. As a result, Petitioner lost everything she owned, including her four children for 13 days, two homes, extracurricular programs, and her career and reputation as a teacher, therapist, and foster/adoptive mother. Petitioner was displaced with her children, and incurred thousands of dollars of debt because of the crimes committed against her family. (**Exhibit G**).

72. Respondent Adam Young falsified police reports in collusion with Respondents McClellan, Wheeler, Deibler, and Scott Smith, including unwarranted apprehension, a fraudulent traffic citation which was dismissed, and fraudulent statements about Petitioner Feinberg's son, A.F. For approximately a week, Respondent Young threatened Petitioner Feinberg, in front of multiple witnesses including Amy Otstott, Isabel

Feinberg, and others, that he was going to fraudulently charge Petitioner with child abuse when she had not done anything wrong. Because of the retaliation and collusion between law enforcement and the Dauphin County Employees, Petitioner lived in absolute fear for her life and her children's lives in Dauphin County for a period of a week until they relocated to Cumberland County. Petitioner filed Civilian Complaints to Respondent Robert Martin, who failed to investigate his employees and concealed the crimes. Petitioner filed criminal complaints to the Dauphin County Investigative Division who covered up the crimes for their colleagues despite the overwhelming physical evidence. For this reason, Respondent Francis Chardo and Collin Zwally are named on this Petition. They were informed of the crimes and obstructing justice in this case. Petitioner has a right to due process, and they are abusing their authority to protect their colleagues. They are not the only ones obstructing justice, the Dauphin County judges are also assisting in the coverup. **(Exhibit H)**.

73. On May 3, 2024, Petitioner, Feinberg, filed a Mandamus Action with this Court, see Feinberg v. Chardo, 251 MD 2024. Respondent Chardo and Zwally denied the Private Criminal Complaint in bad faith to obstruct justice. Respondents Evans, Hockenberry, Chardo, Zwally, and Kennedy committed mail fraud and withheld a Court Order dated May 24, 2024, until

July 2, 2024. They metered the envelope with the Court Postal meter on May 28, 2024. That is a federal crime and has been referred to the United States Postal Inspector General. **(Exhibit I)**.

74. The Order they withheld recused the entire Dauphin County Bench from hearing the Petition for Review. **(Exhibit J)**.

75. Petitioner also filed an Emergency Application for Protective Custody which was GRANTED on August 26, 2024, but then dismissed and vacated by Respondent Morris after he engaged in *ex parte* communication with Respondents McClellan and Wheeler. Petitioner Feinberg is currently raising that matter on appeal at the Pennsylvania Superior Court. **(Exhibit K)**.

76. A Petition for Review involving a criminal complaint against Respondent Marcie Gail Smith for child abuse and abandonment was assigned to Chester County Judge Respondent William P. Mahon. He too is engaging in *ex parte* communication with multiple Respondents, violating Petitioner Feinberg's rights to due process and engaging in public corruption. Chester County appears to be the hub for "case fixing", as the criminal complaint from Philadelphia in the Greenberg case was also transferred to Chester County. **(Exhibit L)**.

77. On June 26, 2024, Petitioner filed a Complaint to the Dauphin County Court of Common Pleas requesting the Removal of District Attorney Francis Chardo for his unlawful engagement and commission of State and Federal crimes pursuant to 16 Pa. §1405. He is named a defendant on a RICO lawsuit at the Fourth Circuit Court for public corruption and obstruction of justice, see *Feinberg v. Cintron*, 0:24-cv-01794. Respondent Evans has not scheduled any hearings to date on the matter. Respondent Evans has overwhelming knowledge of the crimes committed by Respondent Chardo including a separate matter involving the leaking of a grand jury, and to date has not held him accountable in violation of his official duties. The officials are abusing their authority to maintain control of the government, for greed and power. **(Exhibit M)**.

78. Petitioner Feinberg informed Respondent Robin Kennedy of the *ex parte* communication which she admitted to on audio recording with Respondents McClellan and Wheeler. This is a state and federal crime pursuant to 18 U.S. Code § 1505 and referenced in the RICO lawsuit filed to the federal court by Petitioner, see *Feinberg v. Cintron*, 1:24-cv-01957. **(Exhibit A)**.

79. The Dauphin County District Attorney and the Dauphin County Court of Common Pleas Judges and Clerks are not the only entities obstructing

justice. District Attorney James Dellafiora and District Attorney Larry Krasner is similarly obstructing justice in a private criminal complaint filed on July 9, 2024. Petitioner Feinberg filed a Private Criminal Complaint naming Respondents Samuel Goldberg, James Schwartzman, Marlon Osbourne, and Seth Williams, for the first-degree murder of Ellen Greenberg, and the obstruction of justice in a murder-coverup. Petitioner has audio recordings, witness testimony, and hundreds of documents to support the charges alleged. Respondent James Dellafiora transferred the case to Chester County Andrea Cardemone. Petitioner Feinberg emailed Respondent Cardemone multiple times and has received no response. The Petitioner filed a Petition for Review with the Chester County Court of Common Pleas, and to date it has not been docketed. Chester County appears to be the "go to" factory for cleaning up government crimes. (Perhaps that's where Hunter Biden's Laptop is, no pun intended)? (**Exhibit N**).

80. Respondent William P. Mahon is under federal investigation for fraud and public corruption, as are many of the other Respondents. He is engaging in ex parte communication to protect his colleagues. Not only is he violating these laws, but he also responded to a Petition filed by Petitioner Feinberg on a separate custody matter where there is an obvious

conflict of interest, and he should have voluntarily recused himself. (**Exhibit O**).

81. Respondent Anna M. Ciardi is engaging in fraud and public corruption and abusing her official capacity by closing out all the corruption complaints filed to her by multiple civilians, including Petitioners Feinberg and Wolski-Worman's multiple complaints. Petitioner Wolski-Worman sent numerous faxes and certified mail to Thomas J. Farrell, Chief Disciplinary Counsel and Raymond S. Wierciszewski, Deputy Chief Disciplinary Counsel when over 2500 complaints were ignored during the "kids for cash scandal" A recent poll proves that she is doing this routinely to *pro se* litigants that bring public corruption claims. A private criminal complaint was filed against her, and she is under federal investigation. If a prominent member of the Pennsylvania Supreme Court Disciplinary Board is dismissing complaints unnecessarily without investigation, how can *pro se* litigants bring claims for corruption and receive justice? (**Exhibit P**).

82. Respondents Donald L. Carmelite and Kimberly A. Boyer-Cohen committed fraud on multiple courts on behalf of their county clients. On July 31, 2024, Kimberly Boyer-Cohen made false statements on official record before this Court stating in her Brief that Respondents currently have custody of Petitioner Feinberg's children. She did this to confuse the Court

which is a crime. Petitioner Feinberg filed Sanctions against her with this Court. Petitioner Feinberg also filed a private criminal complaint on August 20, 2024, with the Philadelphia District Attorney's office against Respondents Boyer-Cohen and Carmelite, her colleague. Respondent Carmelite has been engaging in mail fraud and extorting a USPS employee on August 29, 2024, to release Petitioner Feinberg's confidential information without authorization. His action led a postal employee to threaten multiple witnesses who's address Petitioner Feinberg was utilizing for safety. In addition, Petitioner Feinberg has filed sanctions against Respondent Carmelite in the Federal Court for gaslighting, harassing, and cyber stalking her and her children's whereabouts, and defaming her publicly with false statements. (**Exhibit Q**).

83. Petitioner, Yvonne Wolski-Worman, like Petitioner Feinberg, also has a lengthy factual history but is bringing claims consolidated with Petitioner Feinberg due to the overlap and similar nature of the Rico crimes and Defamation acted on by the Respondents. Some of the overlapping Respondents are Christopher Paris, Gerard A Karam, Jacqueline Romero, Valerie Arkoosh, Anna M. Ciardi, and Joshua Shapiro who have all failed to protect the Petitioners by failing to uphold their sworn duties. Due to their crimes, Petitioner Wolski-Worman is separated from her incapacitated

brother, has a deceased nephew, and has lost her valuable career as a realtor, notary, and landlord. She also lost her right to bear arms, a second amendment rights violation, at some point during the execution of the fraudulent PFA, a first amendment rights violation.

84. Petitioner Wolski-Worman is advocating for her incapacitated brother whom she has standing to litigate for. Since her brother is incapacitated and was under her care and supervision for an extended period, she was his permanent guardian. Petitioner Wolski-Worman alleges that her brother, Paul, is being held against his will, under an involuntary guardianship where he is being abused against his will and his basic needs are not being met. Petitioner Wolski-Worman and Petitioner Paul, demands to be transferred back to her sole care and custody or terminated from Guardianship when there are less restrictive options. Petitioner alleges that a fraudulent PFA was served in another county that had no jurisdiction and was not properly sealed or signed and that it was a fraudulent tactic to conceal crimes and neglect that was committed like Petitioner Feinberg's allegations. **(Exhibit R USB)**.

85. Petitioner Wolski-Worman also filed numerous complaints to Respondents Shapiro, Ciardi, Arkoosh, Paris, Romero, and Karam, and the rest of the Respondents who have either completely obstructed justice in

her case and violated their official duties, and or, ignored her complaints of the crimes committed, allegedly aiding and abetting.

86. On 9/15/2021, Nancy Barrasse, falsified statements on official record and failed to produce produce Paul M. Wolski, Sr. at his own Guardianship Hearing. Barrasse, utilized her brother's official capacity to release a criminal, John J. McHugh, on house arrest in efforts to secure the guardianship of Paul Wolski for profit. Petitioner Wolski-Worman was present during the guardianship hearing.

87. Later that evening John McHugh assaulted Paul Wolski. The Court Guardian failed to disclose relevant the assault to Wolski-Worman so she would not use it against Barrasse in Court, despite her obligation as a mandated reporter and knowledge of her familial relationship.

88. On 2/12/2022, Paul confirmed on video that a conspiracy was committed between the John McHugh and court staff, for monetary benefits, care-dependent funds, and to reinstate his suspended license at his residential group home located at Monocasy Drive, Nazareth, Pa 18064, Northampton County. (**Exhibit R USB**).

89. Petitioner Wolski-Worman filed criminal complaints to the APS, Nancy Barrasse, the District Attorney, Mark Powell, and the Court. They were ignored.

90. On 2/16/2022, a PFA application was fraudulently prepared through conspiracy, half typed, and half handwritten, by Nancy Hudack, and Nancy Barrasse. The application included a multitude of false statements on official record in the wrong jurisdiction. (**Exhibit S**).

91. On 2/17/2012, Hudack appeared in front of Judge Corbette in Lackawanna for an Emergency hearing, without Wolski present and in violation of his express wishes. Wolski-Worman was never served the court papers pursuant to pa 4203.

92. Wolski-Worman received a virtual invitation via email without proper service and contacted her personal attorney.

93. On 2/28/2022 Wolski sr. confirmed that a conspiracy was committed between the guardianship staff and that he did not agree to a PFA against his sister and requested to return to her care. Instead of reversing the PFA and terminating the guardianship, the Respondents committed ADA discrimination.

94. A PFA was emailed, unsigned unsealed, uncertified, and out of jurisdiction. Both Northampton County addresses are listed on the PFA, despite their fraudulent Petition in Lackawanna County. Wolski Worman filed a nunc pro tunc appeal.

95. On 3/28/2022, Paul Wolski's testimony was muted, by Clerk V. Barrett, as it appeared to the court that his testimony would conflict with their scheme. Petitioner Wolski Sr.'s GAL, John Henry Scanlon, falsified statements on record and committed fraud on the courts by making statements contrary to Petitioner Wolski, Sr.'s audio testimony.
96. On May 19, 2023, Petitioner Wolski, Sr., eloped from the residential home to Petitioner Wolski-Worman's home for safety.
97. On May 22, 2023, Respondent Barrasse unlawfully used the Moore Township Police Department officers to remove Wolski, Sr. from Wolski-Worman's home against his will and returned him to the residential home involuntarily, violating his ADA rights, and trespassing without a warrant.
98. Petitioner Wolski-Worman's nephew, and Petitioner Worman, Sr.'s only child, "Paul M. Wolski, Jr." was found deceased after he succumbed to desperation and emotional distress from the crimes committed against both of his close family members. He passed away on November 3, 2023, and Petitioner Wolski, Sr. was refused access to attend his only child's funeral by Respondent Barrasse.
99. Through today's date, Petitioners Wolski-Worman and Wolski, Sr. have been involuntarily separated against their will because of the fraud and conspiracy committed by the Respondents named herein.

Respondents Karam, and Paris, refused to intervene in a timely manner and permitted the ongoing crimes against both Petitioners Wolski-Worman, and Wolski, Sr. On a later date, District Attorney Mark Powell charged John J. McHugh with three separate felony counts for insurance fraud, pecuniary loss, etc. but refused to reverse the false proceedings due to monetary for-profit benefits to the officials.

100. The Respondents have engaged in massive Rico crimes, including public corruption, obstruction of justice, retaliation, mail fraud, defamation, bribery, kidnapping, child abuse, child neglect, child abandonment, neglect of a care dependent person, etc. and Respondents should be found guilty of such by a competent jury reviewing the evidence.

101. As it appears that statutory law does not authorize this suit be brought against their official capacities, all Respondents are hereby being sued in their personal and individual capacities. There shall be no immunity for these heinous Rico crimes against humanity including any preliminary objections raised by Respondents under immunity claims for state, sovereign, judicial, quasi-judicial/judiciary, total, and or, qualified immunity etc., should be dismissed as MOOT. Any, and all such claims to dispose of these factual allegations, are simply a tactic to evade government liability

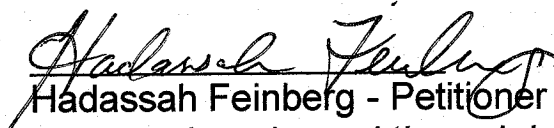
and accountability which further enables the continuance of violations and crimes against Pennsylvania private citizens.

102. The cost of damages incurred by all Petitioners and their families include, the actual loss of life, deprivation of life, liberties, freedom, defamation, excessive moving costs and permanent trauma caused by the Respondents fraudulent and corrupt actions in the State of Pennsylvania resulting in nominal damages that are too great to be calculated by any calculated monetary award. Petitioners, Hadassah Feinberg, *pro se*, E.F., a minor, by and through her parent, Hadassah Feinberg, A.F., a minor, by and through his parent, Hadassah Feinberg, E.F., a minor, by and through her parent, Hadassah Feinberg, B.F., a minor, by and through his parent, Hadassah Feinberg, Yvonne Wolski-Worman, *pro se*, and Paul M. Wolski, Sr. an alleged incapacitated individual, by and through his sister, Yvonne Wolski-Worman, *pro se*, are collectively requesting of this Pennsylvania Commonwealth Court to award injunctive, compensatory, and punitive damages in the amount of at least \$100,000,000 payable to Petitioners Hadassah Feinberg, E.F., A. F., E.F., and B.F. and damages in the amount of \$150,000,000 to include criminally negligent manslaughter and wrongful death of Paul M. Wolski, Jr. payable to Yvonne Wolski-Worman and Paul M. Wolski, Sr.

WHEREFORE, Petitioners, Hadassah Feinberg, *pro se*, E.F., a minor, by and through her parent, Hadassah Feinberg, A.F., a minor, by and through his parent, Hadassah Feinberg, E.F., a minor, by and through her parent, Hadassah Feinberg, B.F., a minor, by and through his parent, Hadassah Feinberg, Yvonne Wolski-Worman, *pro se*, and Paul M. Wolski, Sr. an alleged incapacitated person, by and through his sister, Yvonne Wolski-Worman, *pro se*, respectfully asks this Court to accept this Petition under the Original Jurisdiction of the Pennsylvania Commonwealth Court, in the name of justice, and because the Pennsylvania Commonwealth employees are knowingly violating Commonwealth rules and collectively participating in state and federal crimes, resulting in harm to private citizens in efforts to protect their official positions.

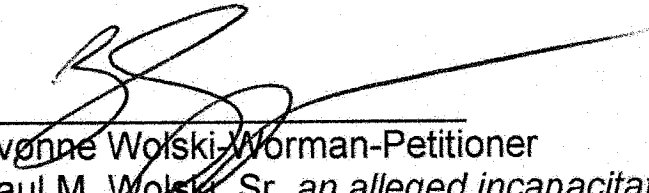
Dated: December 6, 2024

Respectfully submitted,



Hadassah Feinberg - Petitioner
E.F., a minor, by and through her
parent, Hadassah Feinberg - Petitioner
A.F., a minor, by and through his
parent, Hadassah Feinberg- Petitioner
E.F., a minor, by and through her
parent, Hadassah Feinberg- Petitioner
B.F., a minor, by and through his
parent, Hadassah Feinberg - Petitioner
P.O. Box 745
Penney Farms, FL 32079

(352) 514-5335
h_feinberg@yahoo.com



Yvonne Wolski-Worman-Petitioner
Paul M. Wolski, Sr. *an alleged incapacitated
person, by and through his prior
guardian and sister, Yvonne Wolski-Worman,
Petitioner*
2349 Yost Road
Bath, Pa 18014
ywppw@aol.com

cc:

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1100 S Ocean Blvd.
Palm Beach, Fl. 33480

Governor Ron DeSantis
700 North Adams Street
Tallahassee FL 32301

Federal Bureau of Investigation
935 Pennsylvania Ave., NW
Washington, DC 20535-0001

Department of Justice
320 First Street NW.,
Washington, DC 20534

CERTIFICATE OF SERVICE

We, the undersigned, certify that on December 6, 2024, we filed the foregoing Amended Complaint and Notice to Plead, via USPS Certified Mail and Electronic Filing upon the following individuals:

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Harrisburg Pa 17110

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Anna M. Ciardi
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Pittsburgh, PA 15219

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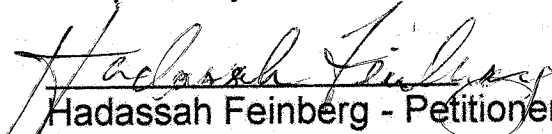
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1425 Arch Street, 4th floor
Philadelphia, PA 19102

Andrea Cardemone
313 West Market Street
West Chester, PA 19380

Nancy Barrasse
224 Adams Ave,
Scranton, PA 18503

Dated: December 6, 2024

Respectfully submitted,


Hadassah Feinberg - Petitioner

*E.F., a minor, by and through her
parent, Hadassah Feinberg - Petitioner*

*A.F., a minor, by and through his
parent, Hadassah Feinberg- Petitioner*

*E.F., a minor, by and through her
parent, Hadassah Feinberg- Petitioner*

*B.F., a minor, by and through his
parent, Hadassah Feinberg - Petitioner*

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Yvonne Wolski-Worman-Petitioner

*Paul M. Wolski, Sr an alleged incapacitated
person, by and through his prior
guardian and sister, Yvonne Wolski-Worman,
Petitioner*

CERTIFICATE OF COMPLIANCE

We certify that this filing complies with the provisions of the *Public Access Policy of the United Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Dated: December 6, 2024

By: Hadassah Feinberg - Petitioner

E.F., a minor, by and through her parent, Hadassah Feinberg - Petitioner

A.F., a minor, by and through his parent, Hadassah Feinberg- Petitioner

E.F., a minor, by and through her parent, Hadassah Feinberg- Petitioner

B.F., a minor, by and through his parent, Hadassah Feinberg - Petitioner

Yvonne Wolski-Worman-Petitioner

Paul M. Wolski, Sr. an alleged incapacitated person, by and through his prior guardian and sister, Yvonne Wolski-Worman, Petitioner