

M  
THE MAZZALAW GROUP, P.C.

3081 ENTERPRISE DRIVE, SUITE 2, STATE COLLEGE, PA 16801  
(814) 237-6255 (814) 237-5752 FAX  
www.mazzalaw.com

May 24, 2013

VIA U.S. MAIL & FACSIMILE (814) 234-0933

Raquel A. Ross, Esq.  
Raquel Ross Law  
1315 South Allen Street, Suite 310  
State College, PA 16801

Re: Heidi Brush-Feldman v. Leland Feldman  
No. CP-14-CV-3103-2012 (Custody)  
Heidi Brush v. Leland Feldman  
No. CP-14-CV-4656-2012 (PFA)

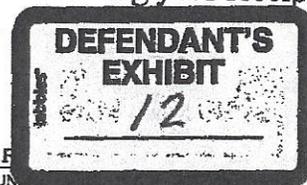
Dear Raquel:

Enclosed please find a Notice of Taking Deposition scheduling your deposition for Thursday, June 6, 2013 at 12:00 p.m. at our office on Enterprise Drive, State College, Pennsylvania. In addition, enclosed is a Subpoena *Duces Tecum* requiring that you bring the threatening communication from Mr. Leland Feldman which you disclosed to Attorney Bierly via telephone.

In lieu of attending the deposition, we are willing to accept a copy of the above communication together with an Affidavit from you containing the following information:

1. Date you received the communication from Mr. Feldman;
2. What language in the communication made you believe that Mr. Feldman was threatening another person or persons;
3. What persons you believed were being threatened;
4. Date you contacted Attorney Bierly; and
5. What communication, if any, you had with Mr. Feldman following your receipt of the threatening communication to discuss its content.

Exhibit 22F



Raquel A. Ross, Esq.  
May 24, 2013  
Page 2 of 2

Finally, I enclose an Authorization and Waiver of Privilege signed by Mr. Feldman allowing you to release the above information to us if you choose to forgo the deposition.

If you would like to discuss the above matter, please contact me.

Very truly yours,  
The Mazza Law Group, P.C.



Mark S. Weaver

MSW/cmm

c: Leland Feldman  
Jennifer P. Bierly, Esq.

W:\Clients\F\Feldman, Leland\ross.05-09-13.docx

Commonwealth of Pennsylvania  
COUNTY OF CENTRE

HEIDI BRUSH-FELDMAN

VS.

LELAND FELDMAN

SUBPOENA DUCES TECUM

TO RAQUEL A. ROSS, Esquire, 1315 South Allen St, Ste 310, State College, PA

You are ordered by the court to come to The Mazza Law Group, PC, 3081 Enterprise Drive, Ste 2, State College at ~~12:00~~ 1:00 P.M. to testify on behalf of

Leland Feldman Thursday, June 6, 2013 at 12:00 P. M. to testify on behalf of

Leland Feldman in the above captioned case and to remain until excused.

And bring with you the following: A copy of the threatening

communication from Leland Feldman which caused you to contact Attorney

Bierly because of a concern for the safety of others.

Witness, the Honorable, Thomas K. Kistler, President Judge of our said

Court at Bellefonte, this 24th day of May, A.D. 20 13

*[Signature]*  
Prothonotary

If you fail to attend or to produce the documents or things required by this Subpoena, you may be subject to the sanctions authorized by Rule 234.5 of the Pennsylvania rules of Procedure, including, but not limited to, costs, attorney fees, and imprisonment.

CC 106



On Wed, Jan 30, 2019 at 2:55 PM Leland Feldman [REDACTED] wrote:

[REDACTED]

January 30, 2019

Vestonia M. Viddy, Esq.  
Attorney for Plaintiff  
Centre Safe  
Civil Legal Representation Project  
PO Box 59  
Bellefonte, PA 16823  
[vviddy@centresafe.org](mailto:vviddy@centresafe.org)

In re: Brush v. Feldman  
2012-3103

Sent to Ms. Vestonia Viddy, Esq. by US Mail and Email

Hello Ms. Viddy,

The custody order for case 2012-3103, signed by Judge Katherine V. Oliver on June 1, 2017 Paragraph 1 states: "Father may deliver weekly letters and gifts for the minor child to Douglas Hearn, Esquire at MidPenn Legal Services. Attorney Hearn shall ensure that HEIDI BRUSH receives those letters and gifts in a timely fashion. HEIDI BRUSH shall provide all such letters and gifts to the minor child on her receipt of same. Any willful violation of these provisions shall be punishable by contempt."

I shall continue to send the letters and gifts to Douglas Hearn, Esquire until the Court issues an Order with different provisions on this matter.

The extant custody order, signed by Judge Pamela A. Ruest on May 20, 2014, in Paragraph 1 states, in part, "Mother shall provide Father with updates regarding the child's health . . .". "In the event Mother fails to provide said packets of information to Father, the Court will reconsider sole legal custody."

It has come to my attention that my Daughter may have received a Viral Neutralization Test on or about October 29, 2018 from the Mount Nittany Medical Center and may have received Emergency Services on or about December 27, 2018 from the Mount Nittany Medical Center. Is this information correct?

As of the writing of this document on January 30, 2019, I have not been informed of any medical test(s) or Emergency Services administered to my Daughter on the aforementioned dates at the aforementioned center. In the event these two visits did occur, please ask you client to provide me with complete medical documentation on those visits, complete documentation related to any incident that may have precipitated either visit, and the overall status of my Daughter's health.

The extant custody order, signed by Judge Pamela A. Ruest on May 20 2014, in Paragraph 1 states, in part, the order applies "For the immediate future . . ." It is now 2019. Your client's offer to continue along the existing lines for an indefinite length of time and "talk further after we see how things are going" is neither fair nor equitable, nor, do I believe, to be the Court's original intention. As I compose a Petition for Modification of a Custody Order to be filed with the Court, I remain open to negotiation.

Sincerely,

Leland Feldman

Exhibit      Z Z G

<b>TEMPORARY PROTECTION FROM ABUSE ORDER</b>	<b>IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA</b>
<input checked="" type="checkbox"/> Amended Order <input type="checkbox"/> Continued Order	<b>NO. 2012-4656</b>



**1. PLAINTIFF**

<b>Heidi</b>	<b>M</b>	<b>Brush</b>	<b>10/31/1972</b>
First	Middle	Last	DOB

Name(s) of All protected persons, including minor child/ren and DOB.

Heidi M Brush

Suffix  
A B B

Plaintiff

V.

**DEFENDANT**

<b>Leland</b>	<b>C</b>	<b>Feldman</b>	
First	Middle	Last	Suffix

Defendant's Address



DEFENDANT IDENTIFIERS			
DOB	[Redacted]	HEIGHT	5 ft. 11 in.
SEX	Male	WEIGHT	195
RACE	White	EYES	Blue
HAIR	Brown		
SSN			
DRIVERS LICENSE #			
EXP DATE		STATE	

**CAUTION:**

- Weapon Involved
- Weapon Present on the Property
- Weapon Ordered Relinquished

The Court Hereby Finds: That it has jurisdiction over the parties and subject matter, and the Defendant will be provided with reasonable notice and opportunity to be heard.

**The Court Hereby Orders:**

- Defendant shall not abuse, harass, stalk or threaten any of the above persons in any place where they might be found.
- Except for such contact with the minor child/ren as may be permitted under paragraph 5 of this order, Defendant shall not contact Plaintiff, or any other person protected under this order, by telephone or by any other means, including through third persons.
- Additional findings of this order are set forth below.

Order Effective Date                      December 27, 2013                      Order Expiration Date                      July 11, 2014

**NOTICE TO THE DEFENDANT**

Defendant is hereby notified that violation of this order may result in arrest for indirect criminal contempt, which is punishable by a fine of up to \$1,000 and/or up to six months in jail. 23 Pa.C.S.A. § 6114. Consent of Plaintiff to Defendant's return to the residence shall not invalidate this order, which can only be changed or modified through the filing of appropriate court papers for that purpose. 23 Pa.C.S.A. § 6108 (g). If Defendant is required to relinquish any firearms, other weapons or ammunition or any firearm license, those items must be relinquished to the sheriff within 24 hours of the service of this order. As an alternative, Defendant may relinquish any firearm, other weapon or ammunition listed herein to a third party provided Defendant and the third party first comply with all requirements to obtain a safekeeping permit. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide an affidavit to the sheriff listing the firearms, other weapons or ammunition and their current location no later than 24 hours after the service of this order. Defendant is further notified that violation of this order may subject him/her to state charges and penalties under the Pennsylvania Crimes Code and to federal charges and penalties under the Violence Against Women Act, 18 U.S.C. § § 2261-2262.

Exhibit 22H

AND NOW, on 27th Day of December, 2013 upon consideration of the attached Petition for Protection from Abuse, the court hereby enters the following Temporary Order:

**Plaintiff's request for an amended temporary protection order is granted.**

1. Defendant shall not abuse, harass, stalk or threaten any of the above persons in any place where they might be found.

2. Defendant is evicted and excluded from the residence at:

\_\_\_\_\_ or any other permanent or temporary residence where Plaintiff or any other person protected under this order may live. Plaintiff is granted exclusive possession of the residence. Defendant shall have no right or privilege to enter or be present on the premises of Plaintiff or any other person protected under this order.

3. Except for such contact with the minor children as may be permitted under paragraph 5 of this order, Defendant is prohibited from having ANY CONTACT with Plaintiff, or any other person protected under this order either directly or indirectly, at any location, including but not limited to any contact at Plaintiff's or other protected party's school, business, or place of employment.

4. Except for such contact with the minor child/ren as may be permitted under paragraph 5 of this order, Defendant shall not contact Plaintiff, or any other person protected under this order, by telephone or by any other means, including through third persons.

5. CUSTODY

THIS ORDER SUPERSEDES ANY PRIOR ORDER RELATING TO CHILD CUSTODY. Until the final hearing, all contact between Defendant and the child/ren shall be limited to the following:

- Upon agreement of the parties, all custody matters shall proceed through Docket Number 3103-2012.

**Defendant shall have contact with the child at the Child Access Center and through Skype as outlined in the custody order of December 27, 2013.**

Pending the outcome of the final hearing in this matter, Plaintiff is awarded temporary custody of the following minor child/ren:

1.  A A B

The local law enforcement agency in the jurisdiction where the child/ren are located shall ensure that the child/ren are placed in the care and control of Plaintiff in accordance with the terms of this order.

6. FIREARMS, OTHER WEAPONS AND AMMUNITION RESTRICTIONS

Defendant is prohibited from possessing, transferring or acquiring any firearms for the duration of this order.

Defendant shall relinquish to the sheriff the following firearms licenses owned or possessed by Defendant:

**Any firearms**

Defendant is directed to relinquish to the sheriff any firearm, other weapon or ammunition listed in Attachment A to Temporary Order, which is incorporated herein by references.

Defendant may relinquish any firearms, other weapons or ammunition to the sheriff. As an alternative, Defendant may relinquish firearms, other weapons and ammunition to a third party provided Defendant and the third party first comply with all the requirements to obtain a safekeeping permit. Defendant must relinquish any firearm, other weapon, ammunition or firearm license ordered to be relinquished no later than 24 hours after service of this order. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide to the sheriff an affidavit listing the firearms, other weapons or ammunition and their current location no later than 24 hours after service of this order. Failure to timely relinquish any firearm, other weapon, ammunition or any firearm license shall result in a violation of this order and may result in criminal conviction under the Uniform Firearms Act, 18 Pa. C.S.A. §6105.

7. The following additional relief is granted:

**Other Relief:**

- **Defendant shall pay Plaintiff for the reasonable financial losses suffered as the result of the abuse, to be determined at the hearing.**

- **Defendant is ordered to pay the costs of this action, including filing and service fees.**

- **Defendant is ordered to pay Plaintiff's reasonable attorney's fees.**

8. A certified copy of this order shall be provided to the sheriff or police department where Plaintiff resides and any other agency specified hereafter:

**All Centre County law enforcement agencies, including Attachment A, if applicable.**

9. The sheriff, police or other law enforcement agencies are directed to serve Defendant with a copy of the petition, any order issued, and the order for hearing. Petitioner will inform the designated authority of any addresses, other than Defendant's residence, where Defendant can be served.
10. THIS ORDER APPLIES IMMEDIATELY TO DEFENDANT AND SHALL REMAIN IN EFFECT UNTIL JULY 11, 2014 OR UNTIL OTHERWISE MODIFIED OR TERMINATED BY THIS COURT AFTER NOTICE AND HEARING.

### **NOTICE TO THE DEFENDANT**

Defendant is hereby notified that violation of this order may result in arrest for indirect criminal contempt, which is punishable by a fine of up to \$1,000 and/or up to six months in jail. 23 Pa.C.S.A. § 6114. Consent of Plaintiff to Defendant's return to the residence shall **not** invalidate this order, which can only be changed or modified through the filing of appropriate court papers for that purpose. 23 Pa.C.S.A. § 6108 (g). If Defendant is required to relinquish any firearms, other weapons or ammunition or any firearm license, those items must be relinquished to the

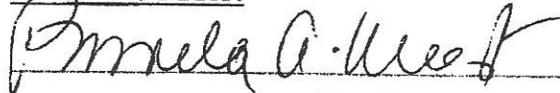
sheriff within 24 hours of the service of this order. As an alternative, Defendant may relinquish any firearm, other weapon or ammunition listed herein to a third party provided Defendant and the third party first comply with all requirements to obtain a safekeeping permit. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide an affidavit to the sheriff listing the firearms, other weapons or ammunition and their current location no later than 24 hours after the service of this order. Defendant is further notified that violation of this order may subject him/her to state charges and penalties under the Pennsylvania Crimes Code and to federal charges and penalties under the Violence Against Women Act, 18 U.S.C. § § 2261-2262.

**NOTICE TO SHERIFF, POLICE AND LAW ENFORCEMENT OFFICIALS**

This order shall be enforced by the police department or sheriff who has jurisdiction over Plaintiff's residence OR any location where a violation of this order occurs OR where Defendant may be located. If Defendant violates Paragraphs 1 through 6 of this order, Defendant shall be arrested on the charge of indirect criminal contempt. An arrest for violation of this order may be made without warrant, based solely on probable cause, whether or not the violation is committed in the presence of a police officer or sheriff.

Subsequent to an arrest, the law enforcement officer or sheriff shall seize all firearms, other weapons and ammunition in Defendant's possession which were used or threatened to be used during the violation of the protection order or during prior incidents of abuse and any other firearms in Defendant's possession. Any firearm, other weapon, ammunition or any firearm license must be delivered to the sheriff's office of the county which issued this order, which office shall maintain possession of the firearms, other weapons and ammunition until further order of this court, unless the weapon/s are evidence of a crime, in which case, they shall remain with the law enforcement agency whose officer or sheriff made the arrest.

BY THE COURT:



Pamela A. Ruest, Judge

Date

Distribution to:

Jennifer Bierly, Esquire, for Plaintiff

Steven Trialonas/Mark Weaver, Esquire, for Defendant

RECEIVED JUL 10 2014

M. Weaver

<b>TEMPORARY PROTECTION FROM ABUSE ORDER</b> <input type="checkbox"/> Amended Order <input checked="" type="checkbox"/> Continued Order	<b>IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA</b> <b>NO. 2012-4656</b>
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**I. PLAINTIFF**

<b>Heidi</b>	<b>M</b>	<b>Brush</b>		
First	Middle	Last	Suffix	Plaintiff DOB

Name(s) of All protected persons, including minor child/ren and DOB.

Heidi M Brush [redacted] [redacted] AAB

V.

**DEFENDANT**

<b>Leland</b>	<b>C</b>	<b>Feldman</b>	
First	Middle	Last	Suffix

Defendant's Address:

[redacted]

DEFENDANT IDENTIFIERS			
DOB	[redacted]	HEIGHT	5 ft. 11 in.
SEX	Male	WEIGHT	195
RACE	White	EYES	Blue
HAIR	Brown		
SSN			
DRIVERS LICENSE #			
EXP DATE		STATE	

**CAUTION:**

- Weapon Involved
- Weapon Present on the Property
- Weapon Ordered Relinquished

The Court Hereby Finds: That it has jurisdiction over the parties and subject matter, and the Defendant will be provided with reasonable notice and opportunity to be heard.

**The Court Hereby Orders:**

- Defendant shall not abuse, harass, stalk or threaten any of the above persons in any place where they might be found.
- Except for such contact with the minor child/ren as may be permitted under paragraph 5 of this order, Defendant shall not contact Plaintiff, or any other person protected under this order, by telephone or by any other means, including through third persons.
- Additional findings of this order are set forth below.

Order Effective Date July 8, 2014      Order Expiration Date August 31, 2014

**NOTICE TO THE DEFENDANT**

Defendant is hereby notified that violation of this order may result in arrest for indirect criminal contempt, which is punishable by a fine of up to \$1,000 and/or up to six months in jail. 23 Pa.C.S.A. § 6114. Consent of Plaintiff to Defendant's return to the residence shall not invalidate this order, which can only be changed or modified through the filing of appropriate court papers for that purpose. 23 Pa.C.S.A. § 6108 (g). If Defendant is required to relinquish any firearms, other weapons or ammunition or any firearm license, those items must be relinquished to the sheriff within 24 hours of the service of this order. As an alternative, Defendant may relinquish any firearm, other weapon or ammunition listed herein to a third party provided Defendant and the third party first comply with all requirements to obtain a safekeeping permit. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide an affidavit to the sheriff listing the firearms, other weapons or ammunition and their current location no later than 24 hours after the service of this order. Defendant is further notified that violation of this order may subject him/her to state charges and penalties under the Pennsylvania Crimes Code and to federal charges and penalties under the Violence Against Women Act, 18 U.S.C. § § 2261-2262.

JUL - 8 PM 4: 43  
 ERIC C. HANDEL  
 CLERK OF COURT  
 HONORARY  
 CENTRE COUNTY, PA

COPY

Exhibit 22I

AND NOW, on 8th Day of July, 2014 upon consideration of the attached Petition for Protection from Abuse, the court hereby enters the following Temporary Order:

**Plaintiff's request for a continued temporary protection order is granted.**

1. Defendant shall not abuse, harass, stalk or threaten any of the above persons in any place where they might be found.

2. Defendant is evicted and excluded from the residence at:

\_\_\_\_\_

or any other permanent or temporary residence where Plaintiff or any other person protected under this order may live. Plaintiff is granted exclusive possession of the residence. Defendant shall have no right or privilege to enter or be present on the premises of Plaintiff or any other person protected under this order.

3. Except for such contact with the minor children as may be permitted under paragraph 5 of this order, Defendant is prohibited from having ANY CONTACT with Plaintiff, or any other person protected under this order either directly or indirectly, at any location, including but not limited to any contact at Plaintiff's or other protected party's school, business, or place of employment.

4. Except for such contact with the minor child/ren as may be permitted under paragraph 5 of this order, Defendant shall not contact Plaintiff, or any other person protected under this order, by telephone or by any other means, including through third persons.

**5. CUSTODY**

THIS ORDER SUPERSEDES ANY PRIOR ORDER RELATING TO CHILD CUSTODY. Until the final hearing, all contact between Defendant and the child/ren shall be limited to the following:

- Upon agreement of the parties, all custody matters shall proceed through Docket Number 3103-2012.

**Defendant shall have contact with the child at the Child Access Center and through Skype as outlined in the custody order of December 27, 2013.**

Pending the outcome of the final hearing in this matter, Plaintiff is awarded temporary custody of the following minor child/ren:

1  A A B

The local law enforcement agency in the jurisdiction where the child/ren are located shall ensure that the child/ren are placed in the care and control of Plaintiff in accordance with the terms of this order.

**6. FIREARMS, OTHER WEAPONS AND AMMUNITION RESTRICTIONS**

Defendant is prohibited from possessing, transferring or acquiring any firearms for the duration of this order.

Defendant shall relinquish to the sheriff the following firearms licenses owned or possessed by Defendant:

**Any firearms**

Defendant is directed to relinquish to the sheriff any firearm, other weapon or ammunition listed in Attachment A to Temporary Order, which is incorporated herein by references.

Defendant may relinquish any firearms, other weapons or ammunition to the sheriff. As an alternative, Defendant may relinquish firearms, other weapons and ammunition to a third party provided Defendant and the third party first comply with all the requirements to obtain a safekeeping permit. Defendant must relinquish any firearm, other weapon, ammunition or firearm license ordered to be relinquished no later than 24 hours after service of this order. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide to the sheriff an affidavit listing the firearms, other weapons or ammunition and their current location no later than 24 hours after service of this order. Failure to timely relinquish any firearm, other weapon, ammunition or any firearm license shall result in a violation of this order and may result in criminal conviction under the Uniform Firearms Act, 18 Pa. C.S.A. §6105.

7. The following additional relief is granted:

Other Relief:

- **Defendant shall pay Plaintiff for the reasonable financial losses suffered as the result of the abuse, to be determined at the hearing.**

- **Defendant is ordered to pay the costs of this action, including filing and service fees.**

- **Defendant is ordered to pay Plaintiff's reasonable attorney's fees.**

8. A certified copy of this order shall be provided to the sheriff or police department where Plaintiff resides and any other agency specified hereafter:

**All Centre County law enforcement agencies, including Attachment A, if applicable.**

9. The sheriff, police or other law enforcement agencies are directed to serve Defendant with a copy of the petition, any order issued, and the order for hearing. Petitioner will inform the designated authority of any addresses, other than Defendant's residence, where Defendant can be served.

10. **THIS ORDER APPLIES IMMEDIATELY TO DEFENDANT AND SHALL REMAIN IN EFFECT UNTIL AUGUST 31, 2014 OR UNTIL OTHERWISE MODIFIED OR TERMINATED BY THIS COURT AFTER NOTICE AND HEARING.**

**A hearing on this matter is scheduled for the 31st Day of July, 2014, at 10:00AM in Courtroom No. 2 of the Centre County Courthouse, Bellefonte, Pennsylvania 16823.**

*AKW*

**NOTICE TO THE DEFENDANT**

Defendant is hereby notified that violation of this order may result in arrest for indirect criminal

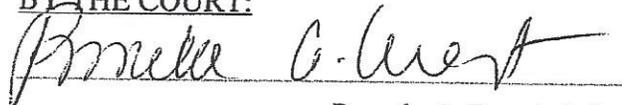
contempt, which is punishable by a fine of up to \$1,000 and/or up to six months in jail. 23 Pa.C.S.A. § 6114. Consent of Plaintiff to Defendant's return to the residence shall **not** invalidate this order, which can only be changed or modified through the filing of appropriate court papers for that purpose. 23 Pa.C.S.A. § 6108 (g). If Defendant is required to relinquish any firearms, other weapons or ammunition or any firearm license, those items must be relinquished to the sheriff within 24 hours of the service of this order. As an alternative, Defendant may relinquish any firearm, other weapon or ammunition listed herein to a third party provided Defendant and the third party first comply with all requirements to obtain a safekeeping permit. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide an affidavit to the sheriff listing the firearms, other weapons or ammunition and their current location no later than 24 hours after the service of this order. Defendant is further notified that violation of this order may subject him/her to state charges and penalties under the Pennsylvania Crimes Code and to federal charges and penalties under the Violence Against Women Act, 18 U.S.C. § § 2261-2262.

#### **NOTICE TO SHERIFF, POLICE AND LAW ENFORCEMENT OFFICIALS**

This order shall be enforced by the police department or sheriff who has jurisdiction over Plaintiff's residence OR any location where a violation of this order occurs OR where Defendant may be located. If Defendant violates Paragraphs 1 through 6 of this order, Defendant shall be arrested on the charge of indirect criminal contempt. An arrest for violation of this order may be made without warrant, based solely on probable cause, whether or not the violation is committed in the presence of a police officer or sheriff.

Subsequent to an arrest, the law enforcement officer or sheriff shall seize all firearms, other weapons and ammunition in Defendant's possession which were used or threatened to be used during the violation of the protection order or during prior incidents of abuse and any other firearms in Defendant's possession. Any firearm, other weapon, ammunition or any firearm license must be delivered to the sheriff's office of the county which issued this order, which office shall maintain possession of the firearms, other weapons and ammunition until further order of this court, unless the weapon/s are evidence of a crime, in which case, they shall remain with the law enforcement agency whose officer or sheriff made the arrest.

BY THE COURT:



Pamela A. Ruest, Judge

Date

Distribution to:

Jennifer Bierly, Esquire, for Plaintiff  
Mark Weaver, Esquire, for Defendant  
Douglas Hearn, Esquire, for Plaintiff

*Weaver*

RECEIVED AUG 21 2014

<b>TEMPORARY PROTECTION FROM ABUSE ORDER</b>	<b>IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA</b>
<input type="checkbox"/> Amended Order <input checked="" type="checkbox"/> Continued Order	<b>NO. 2012-4656</b>

**1. PLAINTIFF**

<b>Heidi</b>	<b>M</b>	<b>Brush</b>		
First	Middle	Last	Suffix	Plaintiff DOB

Name(s) of All protected persons, including minor child/ren and DOB.

Heidi M Brush [REDACTED]

V.

*AAB*

COPY  
AUG 18 PM 4:40

**DEFENDANT**

<b>Leland</b>	<b>C</b>	<b>Feldman</b>	
First	Middle	Last	Suffix

Defendant's Address:

[REDACTED]

DEFENDANT IDENTIFIERS			
DOB	[REDACTED]	HEIGHT	5 ft. 11 in.
SEX	Male	WEIGHT	195
RACE	White	EYES	Blue
HAIR	Brown		
SSN			
DRIVERS LICENSE #			
EXP DATE		STATE	

**CAUTION:**

- Weapon Involved
- Weapon Present on the Property
- Weapon Ordered Relinquished

The Court Hereby Finds: That it has jurisdiction over the parties and subject matter, and the Defendant will be provided with reasonable notice and opportunity to be heard.

**The Court Hereby Orders:**

- Defendant shall not abuse, harass, stalk or threaten any of the above persons in any place where they might be found.
- Except for such contact with the minor child/ren as may be permitted under paragraph 5 of this order, Defendant shall not contact Plaintiff, or any other person protected under this order, by telephone or by any other means, including through third persons.
- Additional findings of this order are set forth below.

Order Effective Date      August 18, 2014      Order Expiration Date      December 14, 2014

**NOTICE TO THE DEFENDANT**

Defendant is hereby notified that violation of this order may result in arrest for indirect criminal contempt, which is punishable by a fine of up to \$1,000 and/or up to six months in jail. 23 Pa.C.S.A. § 6114. Consent of Plaintiff to Defendant's return to the residence shall not invalidate this order, which can only be changed or modified through the filing of appropriate court papers for that purpose. 23 Pa.C.S.A. § 6108 (g). If Defendant is required to relinquish any firearms, other weapons or ammunition or any firearm license, those items must be relinquished to the sheriff within 24 hours of the service of this order. As an alternative, Defendant may relinquish any firearm, other weapon or ammunition listed herein to a third party provided Defendant and the third party first comply with all requirements to obtain a safekeeping permit. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide an affidavit to the sheriff listing the firearms, other weapons or ammunition and their current location no later than 24 hours after the service of this order. Defendant is further notified that violation of this order may subject him/her to state charges and penalties under the Pennsylvania Crimes Code and to federal charges and penalties under the Violence Against Women Act, 18 U.S.C. § 2261-2262.

*Exhibit 225*

AND NOW, on 18th Day of August, 2014 upon consideration of the attached Petition for Protection from Abuse, the court hereby enters the following Temporary Order:

**Plaintiff's request for a continued temporary protection order is granted.**

1. Defendant shall not abuse, harass, stalk or threaten any of the above persons in any place where they might be found.

2. Defendant is evicted and excluded from the residence at:

\_\_\_\_\_ or any other permanent or temporary residence where Plaintiff or any other person protected under this order may live. Plaintiff is granted exclusive possession of the residence. Defendant shall have no right or privilege to enter or be present on the premises of Plaintiff or any other person protected under this order.

3. Except for such contact with the minor children as may be permitted under paragraph 5 of this order, Defendant is prohibited from having ANY CONTACT with Plaintiff, or any other person protected under this order either directly or indirectly, at any location, including but not limited to any contact at Plaintiff's or other protected party's school, business, or place of employment.

4. Except for such contact with the minor child/ren as may be permitted under paragraph 5 of this order, Defendant shall not contact Plaintiff, or any other person protected under this order, by telephone or by any other means, including through third persons.

5. CUSTODY

THIS ORDER SUPERSEDES ANY PRIOR ORDER RELATING TO CHILD CUSTODY. Until the final hearing, all contact between Defendant and the child/ren shall be limited to the following:

- Upon agreement of the parties, all custody matters shall proceed through Docket Number 3103-2012.

**Defendant shall have contact with the child at the Child Access Center and through Skype as outlined in the custody order of December 27, 2013.**

Pending the outcome of the final hearing in this matter, Plaintiff is awarded temporary custody of the following minor child/ren:

 A A B

The local law enforcement agency in the jurisdiction where the child/ren are located shall ensure that the child/ren are placed in the care and control of Plaintiff in accordance with the terms of this order.

6. FIREARMS, OTHER WEAPONS AND AMMUNITION RESTRICTIONS

Defendant is prohibited from possessing, transferring or acquiring any firearms for the duration of this order.

Defendant shall relinquish to the sheriff the following firearms licenses owned or possessed by Defendant:

**Any firearms**

Defendant is directed to relinquish to the sheriff any firearm, other weapon or ammunition listed in Attachment A to Temporary Order, which is incorporated herein by references.

Defendant may relinquish any firearms, other weapons or ammunition to the sheriff. As an alternative, Defendant may relinquish firearms, other weapons and ammunition to a third party provided Defendant and the third party first comply with all the requirements to obtain a safekeeping permit. Defendant must relinquish any firearm, other weapon, ammunition or firearm license ordered to be relinquished no later than 24 hours after service of this order. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide to the sheriff an affidavit listing the firearms, other weapons or ammunition and their current location no later than 24 hours after service of this order. Failure to timely relinquish any firearm, other weapon, ammunition or any firearm license shall result in a violation of this order and may result in criminal conviction under the Uniform Firearms Act, 18 Pa. C.S.A. §6105.

7. The following additional relief is granted:

Other Relief:

- Defendant shall pay Plaintiff for the reasonable financial losses suffered as the result of the abuse, to be determined at the hearing.

- Defendant is ordered to pay the costs of this action, including filing and service fees.

- Defendant is ordered to pay Plaintiff's reasonable attorney's fees.

8. A certified copy of this order shall be provided to the sheriff or police department where Plaintiff resides and any other agency specified hereafter:

**All Centre County law enforcement agencies, including Attachment A, if applicable.**

9. The sheriff, police or other law enforcement agencies are directed to serve Defendant with a copy of the petition, any order issued, and the order for hearing. Petitioner will inform the designated authority of any addresses, other than Defendant's residence, where Defendant can be served.

10. THIS ORDER APPLIES IMMEDIATELY TO DEFENDANT AND SHALL REMAIN IN EFFECT UNTIL DECEMBER 14, 2014 OR UNTIL OTHERWISE MODIFIED OR TERMINATED BY THIS COURT AFTER NOTICE AND HEARING.

**A hearing on this matter is scheduled for the 14th Day of November, 2014, at 1:00PM in Courtroom No. 2 of the Centre County Courthouse, Bellefonte, Pennsylvania 16823.**

*ARW*

**NOTICE TO THE DEFENDANT**

Defendant is hereby notified that violation of this order may result in arrest for indirect criminal

contempt, which is punishable by a fine of up to \$1,000 and/or up to six months in jail. 23 Pa.C.S.A. § 6114. Consent of Plaintiff to Defendant's return to the residence shall **not** invalidate this order, which can only be changed or modified through the filing of appropriate court papers for that purpose. 23 Pa.C.S.A. § 6108 (g). If Defendant is required to relinquish any firearms, other weapons or ammunition or any firearm license, those items must be relinquished to the sheriff within 24 hours of the service of this order. As an alternative, Defendant may relinquish any firearm, other weapon or ammunition listed herein to a third party provided Defendant and the third party first comply with all requirements to obtain a safekeeping permit. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide an affidavit to the sheriff listing the firearms, other weapons or ammunition and their current location no later than 24 hours after the service of this order. Defendant is further notified that violation of this order may subject him/her to state charges and penalties under the Pennsylvania Crimes Code and to federal charges and penalties under the Violence Against Women Act, 18 U.S.C. § 2261-2262.

#### NOTICE TO SHERIFF, POLICE AND LAW ENFORCEMENT OFFICIALS

This order shall be enforced by the police department or sheriff who has jurisdiction over Plaintiff's residence OR any location where a violation of this order occurs OR where Defendant may be located. If Defendant violates Paragraphs 1 through 6 of this order, Defendant shall be arrested on the charge of indirect criminal contempt. An arrest for violation of this order may be made without warrant, based solely on probable cause, whether or not the violation is committed in the presence of a police officer or sheriff.

Subsequent to an arrest, the law enforcement officer or sheriff shall seize all firearms, other weapons and ammunition in Defendant's possession which were used or threatened to be used during the violation of the protection order or during prior incidents of abuse and any other firearms in Defendant's possession. Any firearm, other weapon, ammunition or any firearm license must be delivered to the sheriff's office of the county which issued this order, which office shall maintain possession of the firearms, other weapons and ammunition until further order of this court, unless the weapon/s are evidence of a crime, in which case, they shall remain with the law enforcement agency whose officer or sheriff made the arrest.

BY THE COURT:



Pamela A. Ruest, Judge

Date

Distribution to:

Jennifer Bierly, Esquire, for Plaintiff  
Mark Weaver, Esquire, for Defendant  
Douglas Hearn, Esquire, for Plaintiff



AND NOW, on 23rd Day of September, 2014 upon consideration of the attached Petition for Protection from Abuse, the court hereby enters the following Temporary Order:

**Plaintiff's request for a continued temporary protection order is granted.**

1. Defendant shall not abuse, harass, stalk or threaten any of the above persons in any place where they might be found.

2. Defendant is evicted and excluded from the residence at:

\_\_\_\_\_

or any other permanent or temporary residence where Plaintiff or any other person protected under this order may live. Plaintiff is granted exclusive possession of the residence. Defendant shall have no right or privilege to enter or be present on the premises of Plaintiff or any other person protected under this order.

3. Except for such contact with the minor children as may be permitted under paragraph 5 of this order, Defendant is prohibited from having **ANY CONTACT** with Plaintiff, or any other person protected under this order either directly or indirectly, at any location, including but not limited to any contact at Plaintiff's or other protected party's school, business, or place of employment.

4. Except for such contact with the minor child/ren as may be permitted under paragraph 5 of this order, Defendant shall not contact Plaintiff, or any other person protected under this order, by telephone or by any other means, including through third persons.

**5. CUSTODY**

**THIS ORDER SUPERSEDES ANY PRIOR ORDER RELATING TO CHILD CUSTODY.**

Until the final hearing, all contact between Defendant and the child/ren shall be limited to the following:

- Upon agreement of the parties, all custody matters shall proceed through Docket Number 3103-2012.

**Defendant shall have contact with the child at the Child Access Center and through Skype as outlined in the custody order of December 27, 2013.**

Pending the outcome of the final hearing in this matter, Plaintiff is awarded temporary custody of the following minor child/ren:

1.  A A B

The local law enforcement agency in the jurisdiction where the child/ren are located shall ensure that the child/ren are placed in the care and control of Plaintiff in accordance with the terms of this order.

**6. FIREARMS, OTHER WEAPONS AND AMMUNITION RESTRICTIONS**

Defendant is prohibited from possessing, transferring or acquiring any firearms for the duration of this order.

Defendant shall relinquish to the sheriff the following firearms licenses owned or possessed by Defendant:

**Any firearms**

Defendant is directed to relinquish to the sheriff any firearm, other weapon or ammunition listed in Attachment A to Temporary Order, which is incorporated herein by references.

Defendant may relinquish any firearms, other weapons or ammunition to the sheriff. As an alternative, Defendant may relinquish firearms, other weapons and ammunition to a third party provided Defendant and the third party first comply with all the requirements to obtain a safekeeping permit. Defendant must relinquish any firearm, other weapon, ammunition or firearm license ordered to be relinquished no later than 24 hours after service of this order. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide to the sheriff an affidavit listing the firearms, other weapons or ammunition and their current location no later than 24 hours after service of this order. Failure to timely relinquish any firearm, other weapon, ammunition or any firearm license shall result in a violation of this order and may result in criminal conviction under the Uniform Firearms Act, 18 Pa. C.S.A. §6105.

7. The following additional relief is granted:

Other Relief:

- Defendant shall pay Plaintiff for the reasonable financial losses suffered as the result of the abuse, to be determined at the hearing.

- Defendant is ordered to pay the costs of this action, including filing and service fees.

- Defendant is ordered to pay Plaintiff's reasonable attorney's fees.

8. A certified copy of this order shall be provided to the sheriff or police department where Plaintiff resides and any other agency specified hereafter:

**All Centre County law enforcement agencies, including Attachment A, if applicable.**

9. The sheriff, police or other law enforcement agencies are directed to serve Defendant with a copy of the petition, any order issued, and the order for hearing. Petitioner will inform the designated authority of any addresses, other than Defendant's residence, where Defendant can be served.

10. THIS ORDER APPLIES IMMEDIATELY TO DEFENDANT AND SHALL REMAIN IN EFFECT UNTIL DECEMBER 5, 2014 OR UNTIL OTHERWISE MODIFIED OR TERMINATED BY THIS COURT AFTER NOTICE AND HEARING.

A hearing on this matter is scheduled for the 5th Day of November, 2014, at 9:00 AM in Courtroom No. 2 of the Centre County Courthouse, Bellefonte, Pennsylvania 16823.

**NOTICE TO THE DEFENDANT**

Defendant is hereby notified that violation of this order may result in arrest for indirect criminal

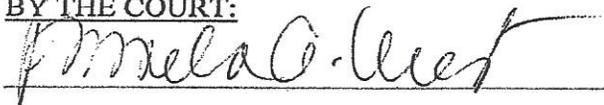
contempt, which is punishable by a fine of up to \$1,000 and/or up to six months in jail. 23 Pa.C.S.A. § 6114. Consent of Plaintiff to Defendant's return to the residence shall **not** invalidate this order, which can only be changed or modified through the filing of appropriate court papers for that purpose. 23 Pa.C.S.A. § 6108 (g). If Defendant is required to relinquish any firearms, other weapons or ammunition or any firearm license, those items must be relinquished to the sheriff within 24 hours of the service of this order. As an alternative, Defendant may relinquish any firearm, other weapon or ammunition listed herein to a third party provided Defendant and the third party first comply with all requirements to obtain a safekeeping permit. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide an affidavit to the sheriff listing the firearms, other weapons or ammunition and their current location no later than 24 hours after the service of this order. Defendant is further notified that violation of this order may subject him/her to state charges and penalties under the Pennsylvania Crimes Code and to federal charges and penalties under the Violence Against Women Act, 18 U.S.C. § § 2261-2262.

#### NOTICE TO SHERIFF, POLICE AND LAW ENFORCEMENT OFFICIALS

This order shall be enforced by the police department or sheriff who has jurisdiction over Plaintiff's residence OR any location where a violation of this order occurs OR where Defendant may be located. If Defendant violates Paragraphs 1 through 6 of this order, Defendant shall be arrested on the charge of indirect criminal contempt. An arrest for violation of this order may be made without warrant, based solely on probable cause, whether or not the violation is committed in the presence of a police officer or sheriff.

Subsequent to an arrest, the law enforcement officer or sheriff shall seize all firearms, other weapons and ammunition in Defendant's possession which were used or threatened to be used during the violation of the protection order or during prior incidents of abuse and any other firearms in Defendant's possession. Any firearm, other weapon, ammunition or any firearm license must be delivered to the sheriff's office of the county which issued this order, which office shall maintain possession of the firearms, other weapons and ammunition until further order of this court, unless the weapon/s are evidence of a crime, in which case, they shall remain with the law enforcement agency whose officer or sheriff made the arrest.

BY THE COURT:



Pamela A. Ruest, Judge

\_\_\_\_\_  
Date

Distribution to:

Jennifer Bierly, Esquire, for Plaintiff  
Mark Weaver, Esquire, for Defendant  
Douglas Hearn, Esquire, for Plaintiff