

# **APPENDIX**

## **A**

<b>PETITION FOR PROTECTION FROM ABUSE</b>	<b>IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA NO.</b>
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**1. PLAINTIFF**

Heidi	M	Brush		
First	Middle	Last	Suffix	Plaintiff DOB

Plaintiff's Address:

Plaintiff's address is confidential or  Plaintiff's address is:

V.

**2. DEFENDANT**

Leland	C	Feldman		
First	Middle	Last	Suffix	

Defendant's Address:

DEFENDANT IDENTIFIERS			
DOB		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 Requested Relinquished

Defendant's place of employment is: **Unknown**

Check here if you have reason to believe that Defendant is a licensed firearms dealer, is employed by a licensed firearms dealer or manufacturer; is employed as a writer, researcher or technician in the firearms or hunting industry or is required to carry a firearm as a condition of employment.

3. I am filing this Petition on behalf of:  Myself and/or  Another Person

If you checked "myself", please answer all questions referring to yourself as "Plaintiff". If you ONLY checked "another person", please answer all questions referring to that person as the "Plaintiff", and provide your name and address here, as filer, unless confidential.

Filer's Name:

First	Middle	Last	Suffix	

Filer's address is confidential or  Filer's address is:

If you checked "Another Person", indicate your relationship with Plaintiff:

- parent of minor Plaintiff(s)
- applicant for appointment as guardian ad litem of minor Plaintiff(s)
- adult household member with minor Plaintiff(s)
- court appointed guardian of incompetent Plaintiff(s)

4. Name(s) of ALL person(s), including minor children, who seek protection from abuse.

Heidi M Brush [REDACTED] AAB

FILED FOR REC...  
 2012 DEC 17 P 4:39  
 CLERK OF COURT  
 CENTRE COUNTY, PA

5. The relationship between Plaintiff and Defendant is:

- spouse or former spouse of Defendant
- parent of a child with Defendant
- current or former sexual or intimate partner with Defendant
- child of Plaintiff
- child of Defendant
- family member related by blood (consanguinity) to Defendant
- family member related by marriage or affinity to Defendant
- sibling (person who shares parenthood) of Defendant

Defendant is an **adult**.

6. Plaintiff and Defendant have been involved in the following court actions:

**Divorce Custody Protection From Abuse**

Other details of the court action are:

**December 2012: ePFA filed in Centre County June 2009: Divorce filed in Fayette County**

7. Defendant has been involved in a criminal court action.

- Defendant is **not** currently on probation / parole

8. Plaintiff and Defendant are the parents of the following minor child/ren:

 **AAB**  


Child's address is: **Confidential**

9. There is an existing court order regarding the custody of Plaintiff's and Defendant's minor children.

The terms of the order are: **Plaintiff has primary physical custody. Plaintiff and Defendant share legal custody.**

County: **Centre**

State: **PA**

10. Plaintiff is seeking an order of child custody as part of this petition.

The following is a list of the children and where they have lived for the past 5 years:

 **AAB**

For the past 5 years, this child has lived with:

**Minor child has resided in Centre County with her mother since February 2010. In 2009, minor child resided with her mother in Fayette County PA**

11. The facts of the most recent incident of abuse are as follows:

On about Wednesday, December 12, 2012 at approximately 2:00PM

location: PSU Campus

On the afternoon of the 12th, I was attacked while taking a walk on PSU hiking trails – hours after a custody dispute that didn't go the defendant's way. This episode has left me concerned for my safety and that of my daughter. On Friday, December 14th, Judge Ruest granted me an emergency PFA against the defendant.

12. Prior incidents of abuse that Defendant has committed against Plaintiff or the minor child/ren, (including any threats, injuries, or incidents of stalking) are as follows:

See attached Abuse Checklist.

I was married to the defendant from February 2007 to December 2008. On November 1, 2008, the defendant assaulted me and was arrested. During our marriage, there were ongoing verbal threats to kill me. There was intimidation by slamming down objects near me. There were incidents when he threw items at me while I was holding our young daughter.

13. (a) Has Defendant used or threatened to use any firearms or other weapons against Plaintiff or the minor child/ren?

NO

(b) Other than the firearms, other weapons or ammunition Defendant used or threatened to use against Petitioner or the minor child/ren, does Defendant, to the best of your knowledge or belief, own or possess any additional firearm, other weapon, ammunition or any firearm license?

YES

(c) If the answer to (b) above is "Yes", list any additional firearm, other weapon or ammunition owned by or in the possession of Defendant on Attachment A to Petition, which is incorporated by reference into this petition.

(d) Plaintiff **DOES** request that the court order Defendant to relinquish firearms, other weapons or ammunition listed on Attachment A to Petition. See **Attachment A** to Petition, for a list of firearms, other weapons and ammunition Plaintiff requests the court to order Defendant to relinquish.

14. The sheriff, police department or law enforcement agency that should be provided with a copy of the protection order are:

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

15. There is an immediate and present danger of further abuse from Defendant.

16. FOR THE REASONS SET FORTH ABOVE, I REQUEST THAT THE COURT ENTER A

**TEMPORARY ORDER, and AFTER HEARING, A FINAL ORDER THAT WOULD DO THE FOLLOWING:**

- a. Restrain Defendant from abusing, threatening, harassing, or stalking Plaintiff and/or the minor child/ren in any place where Plaintiff and/or the child/ren may be found.
- b. Evict/exclude Defendant from Plaintiff's residence and prohibit Defendant from attempting to enter any temporary or permanent residence of Plaintiff.
- c. Award Plaintiff temporary custody of the minor child/ren and place the following restrictions on contact between Defendant and the child/ren:

**No contact between Defendant and minor child.**

- d. Prohibit Defendant from having any contact with Plaintiff and/or the minor child/ren, either in person, by telephone, or in writing, personally or through third persons, including but not limited to any contact at Plaintiff's school, business, or place of employment, except as the court may find necessary with respect to partial custody and/or visitation with the minor child/ren.
- e. Order Defendant to temporarily relinquish some or all of the firearms, other weapons and/or ammunition listed on Attachment A to Petition and any firearm license to the sheriff of this county and/or prohibit Defendant from transferring, acquiring, or possessing some or all firearms for the duration of the order.
- f. Direct Defendant to pay Plaintiff for the reasonable financial losses suffered as the result of the abuse, to be determined at the hearing.
- g. Order Defendant to pay the costs of this action, including filing and service fees.
- h. Order Defendant to pay Plaintiff's reasonable attorney's fees.
- i. Grant such other relief as Plaintiff requests and/or the court deems appropriate.
- j. Order the police, sheriff or other law enforcement agency to serve Defendant with a copy of this petition, any order issued, and the order for hearing. Plaintiff will inform the designated authority of any addresses, other than the Defendant's residence, where Defendant can be served.

**VERIFICATION**

I verify that I am the petitioner as designated in the present action and that the facts and statements contained in the above petition are true and correct to the best of my knowledge. I understand that any false statements are made subject to the Penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsification to

2/17/12

Petition For Protection From Abuse No:

Signature

*Jh L Grl*

12/17/12

Date

PFAD Number: BH4981663Q

**ABUSE CHECKLIST - ATTACHMENT TO PFA PETITION**

Type of Abuse	Experienced abuse by defendant?	Indicate either the dates of the incidents or the frequency of the abuse	Indicate physical injuries, if any	Was there police contact?
Grabbing, shoving or pushing	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Slapping (with an open hand)	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Punching (with a closed fist)	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Kicking	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Choking or strangling (any grabbing of the neck)	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Biting	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Forcing sexual contact	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Forcing to stay in closet, room, home, or location	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Physically restraining/holding down the victim	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Received threatening or harassing phone calls	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Has the defendant threatened to kill you?	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Does the defendant have access to weapons?	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Threat by displaying or pointing weapon	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Using a weapon (including but not limited to a firearm)	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Threat by cruelty to animals	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Physically abusing children in the household	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Sexually abusing children in household	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Threat to injure self/others	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Threat by following	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Threat by damage to property	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Name calling/directed use of obscenities	Yes <input checked="" type="radio"/> No <input type="radio"/>			
Has the physical violence increased in severity or frequency over the past year?	Yes <input type="radio"/> No <input type="radio"/>			
Have you left the defendant after living together during the past year?	Yes <input type="radio"/> No <input type="radio"/>			
Is the defendant unemployed?	Yes <input type="radio"/> No <input checked="" type="radio"/>	N/A		
Has the defendant avoided being arrested for domestic violence?	Yes <input type="radio"/> No <input checked="" type="radio"/>			
Do you have a minor child that is not the defendant's?	Yes <input type="radio"/> No <input checked="" type="radio"/>			

Signature of petitioner

*[Handwritten Signature]*

Date

12/17/12

# **APPENDIX**

## **B**

PETITION FOR PROTECTION FROM ABUSE	IN THE COURT OF COMMON PLEAS OF Centre COUNTY, PENNSYLVANIA NO. <u>2019-310</u>
------------------------------------	--

1. PLAINTIFF

Heidi	Marie	Brush		
First	Middle	Last	Suffix	Plaintiff DOB

Plaintiff's Address:

Plaintiff's address is confidential or  Plaintiff's address is:

V.

2. DEFENDANT

Leland	Craig	Feldman	
First	Middle	Last	Suffix

Defendant's Address:



DEFENDANT IDENTIFIERS			
DOB	[REDACTED]	HEIGHT	5 ft. 10 in.
SEX	Male	WEIGHT	230
RACE	White	EYES	
HAIR	Unknown or Completely Bald		
SSN			
DRIVERS LICENSE #			
EXP DATE		STATE	Wisconsin

CAUTION:

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

Defendant's place of employment is: Travel Nurse in Arizona, Wisconsin, and other unknown states

Check here if you have reason to believe that Defendant is a licensed firearms dealer, is employed by a licensed firearms dealer or manufacturer; is employed as a writer, researcher or technician in the firearms or hunting industry or is required to carry a firearm as a condition of employment.

3. I am filing this Petition on behalf of:  Myself and/or  Another Person

If you checked "myself", please answer all questions referring to yourself as "Plaintiff". If you ONLY checked "another person", please answer all questions referring to that person as the "Plaintiff", and provide your name and address here, as filer, unless confidential.

Filer's Name:

First	Middle	Last	Suffix

Filer's address is confidential or  Filer's address is:

If you checked "Another Person", indicate your relationship with Plaintiff:

- Parent of Minor Plaintiff(s)
- Applicant for appointment as guardian ad litem of minor Plaintiff(s)
- Adult household member with minor Plaintiff(s)
- Court-appointed guardian of incompetent Plaintiff(s)

FILED FOR RECORD  
 2019 FEB - 1 P 1:34  
 DEBRA C. JIMEL  
 PROTHONOTARY  
 CENTRE COUNTY, PA

4. Name(s) of ALL person(s), including minor children, who seek protection from abuse.

Heidi Marie Brush



AAB

5. The relationship between Plaintiff and Defendant is:

- Spouse or Former Spouse of Defendant
- Parent of a Child with Defendant
- Current or Former Sexual or Intimate Partner with Defendant

Defendant is an adult.

6. Plaintiff and Defendant have been involved in the following court actions:

Divorce Custody Support Protection from Abuse

Other details of the court action are:

Divorce filed in June 2009 in Fayette County, PA.

Custody initially filed in 2009 in Fayette County, PA. Transferred to Centre County in 2012.

Child Support filed in February 2010 in Fayette County, PA. Transferred to Centre County in May 2012.

PFA filed and granted in 2008 in Routt County, Colorado.

EPFA filed and granted and a temporary PFA filed and granted in December 2012 in Centre County, PA. (Multiple extensions of this PFA).

3 year Final PFA granted in 2015 in Centre County, PA.

EPFA filed and granted yesterday, Jan. 31, 2019 in Centre County, PA.

7. Defendant has been involved in a criminal court action.

8. There is an existing court order regarding the custody of Plaintiff's and Defendant's minor children.

The terms of the order are: Plaintiff has sole legal custody of minor child. Defendant has the ability to write letters and send gifts for minor child and deliver them to Douglas Hearn, Esq. to then be given to minor child.

County: Centre County

State: PA

9. Plaintiff and Defendant are the parents of the following minor child/ren:

a.  AAB  
  
 Child's address is: Confidential

10. The facts of the most recent incident of abuse are as follows:

On about Thursday, January 31, 2019 at approximately 1:00 PM  
location: Through Email

I received an email on January 31, 2019 from my custody attorney. The email included a letter from Leland to my attorney in which Leland made several complaints about custody matters. In it he specifically referenced two visits my daughter had made to Mount Nittany Medical Center and did not explain how he obtained that protected information.

Specifically that portion of his email is as follows: "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."

In order to understand how I obtained that information, I contacted MNMC records office and they assured me that no one had filled out a medical release form and they had not given out any information in person or over the phone. They stated that there is no way that he could have obtained that information legally. Directly after that I went to my daughter's pediatrician and asked all of the office staff if they had released any information and they assured me that they had not and they also explained that for him to have this information he would have obtained it illegally and encouraged me to contact the police with my concerns. I reported this incident to police and filed for and was granted an Emergency PFA last evening.

After learning this information from MNMC, I immediately felt very afraid for my safety and my daughter's safety based on my knowledge of his previous behaviors and abuse towards me. The fact that he has this specific medical information makes me fear that he is continuing to stalk/track me.

Back in November 2018 near the time of the court hearing on November 14, I received a critical security alert from Google warning me that someone had tried to access my email account and that it had been locked down. Leland was aware of this email account as it's one I've used/had for many years. There have also been several unusual signs that I've been followed.

I believe that he is stalking me/tracking me and has gone out of his way to get information about me and my daughter. I believe this stalking pattern is to intimidate me and to make me aware and know that he's doing this to freak me out more and to remind me that he has control over me. This is just part of a larger pattern of his controlling, stalking, and abusive behavior towards me.

My continued fears about being stalked/tracked by him are intensified due to the fact that no one, including law enforcement, seem to know where he is/lives/works. He has multiple addresses associated with him. Most recently in a letter he sent to [REDACTED] he claims to live in Arizona but in the email he sent to my attorney two days ago he claims he lives in Wisconsin. He could even be living locally and I wouldn't know.

I'm very concerned about his stalking of me and [REDACTED] and the probability of violence.

11. Prior incidents of abuse that Defendant has committed against Plaintiff or the minor child/ren, (including any threats, injuries, or incidents of stalking) are as follows:

Please see attached abuse checklist.

Previous incidents include:

Threats to kill me and minor child - prior incidents have included defendant threatening to kill me and child when I was pregnant; defendant would often wear his gun (he's ex-law enforcement) and would draw attention to it when he was verbally abusive to me; he used to make statements such as "who knows how long you'll be around", he told a female friend of his in an email that he would be able to do some type of task for her, and he said he could help her with something after he "took care of 1 or 2 problems" and it was evident he was talking about me and my daughter; I even made a point to tell my friends that if I ever died from anything that looked accidental that he was the reason behind it.

Punching, grabbing, shoving, pushing - we were all in the car driving and [REDACTED] was 6 weeks old, he screamed and turned the music on full blast and was side-punching me with his arm in my chest while he was driving.

Nov. 2008 - Leland attacked me, he went to jail, a PFA was issued, he lost his job in law enforcement, [REDACTED] and I left the state to get away from him.

Dec. 2012 - After escalating tension in custody matters, the day of the custody conference I was attacked at knife point and the attacker said "you know what this is" - in my mind referring to Leland and all of the things I've "done against him" and this was his payback. The knife attacker slit my throat and after I fought him and struggled, he fled. There were many suspicious circumstances regarding this attack and Leland, such as him checking himself into a police department the day of the attack. He also had called the police asking where [REDACTED] was. He had also made phone calls to a life insurance agency in PA a week before.

Stalking/tracking concerns:

After a supervised visit in Maryland years ago, Leland followed us out into the parking lot in a menacing manner against the rules of the supervised visit.

During a previous deposition in court, Leland attempted to question me in order to find out personal details about me such as my address, romantic relationships, where I worked, any medications I was taking, etc.

Over the summer of 2018, through a large document which he had filed, one of the exhibits he included was a copy of a letter for my job offer for employment - considering there was a PFA in place at the time and my address had been kept confidential, it's very concerning as to how he obtained this particular personal letter.

I was contacted by multiple people (law enforcement and attorneys) regarding concerns that he was stalking me [REDACTED] and I had gone into hiding because of these concerns multiple times and have moved multiple times.

12. (a) Has Defendant used or threatened to use any firearms or other weapons against Plaintiff or the minor child/ren?

YES If so, please describe the use or threatened use below and list on Attachment A to Petition, which is incorporated by reference into this petition, any firearms, other weapons or ammunition Defendant used or threatened to use against Plaintiff and/or the minor children:

**Implied/intimated threats of use of weapon against plaintiff.**

(b) Other than the firearms, other weapons or ammunition Defendant used or threatened to use against Petitioner or the minor child/ren, does Defendant, to the best of your knowledge or belief, own or possess any additional firearm, other weapon, ammunition or any firearm license?

**NO**

(c) If the answer to (b) above is "Yes", list any additional firearm, other weapon or ammunition owned by or in the possession of Defendant on Attachment A to Petition, which is incorporated by reference into this petition.

(d) Plaintiff **DOES** request that the court order Defendant to relinquish firearms, other weapons or ammunition listed on Attachment A to Petition. See **Attachment A** to Petition, for a list of firearms, other weapons and ammunition Plaintiff requests the court to order Defendant to relinquish.

13. The sheriff, police department or law enforcement agency that should be provided with a copy of the protection order are: **All Centre County law enforcement agencies, including Attachment A, if applicable.**

14. There is an immediate and present danger of further abuse from Defendant.

15. Plaintiff is asking the court to evict and exclude Defendant from the following residence:

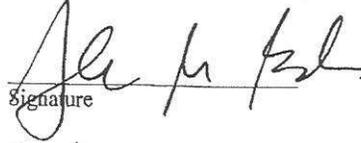
Plaintiff is asking the court to evict and exclude Defendant from the following residence:  
**Excluded from plaintiff's confidential address.**

**16. FOR THE REASONS SET FORTH ABOVE, I REQUEST THAT THE COURT ENTER A TEMPORARY ORDER, and AFTER HEARING, A FINAL ORDER THAT WOULD DO THE FOLLOWING:**

- a. Restrain Defendant from abusing, threatening, harassing, or stalking Plaintiff and/or the minor child/ren in any place where Plaintiff and/or the child/ren may be found.
- b. Evict/exclude Defendant from Plaintiff's residence and prohibit Defendant from attempting to enter any temporary or permanent residence of Plaintiff.
- c. Prohibit Defendant from having any contact with Plaintiff and/or the minor child/ren, either in person, by telephone, or in writing, personally or through third persons, including but not limited to any contact at Plaintiff's school, business, or place of employment, except as the court may find necessary with respect to partial custody and/or visitation with the minor child/ren.
- d. Order Defendant to temporarily relinquish some or all of the firearms, other weapons and/or ammunition listed on Attachment A to Petition and any firearm license to the sheriff of this county and/or prohibit Defendant from transferring, acquiring, or possessing some or all firearms for the duration of the order.
- e. Direct Defendant to pay Plaintiff for the reasonable financial losses suffered as the result of the abuse, to be determined at the hearing.
- f. Order Defendant to pay the costs of this action, including filing and service fees.
- g. Order Defendant to pay Plaintiff's reasonable attorney's fees.
- h. Grant such other relief as Plaintiff requests and/or the court deems appropriate.
- i. Order the police, sheriff or other law enforcement agency to serve Defendant with a copy of this petition, any order issued, and the order for hearing. Plaintiff will inform the designated authority of any addresses, other than the Defendant's residence, where Defendant can be served.

**VERIFICATION**

I verify that I am the petitioner as designated in the present action and that the facts and statements contained in the above petition are true and correct to the best of my knowledge. I understand that any false statements are made subject to the Penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsification to authorities

  
Signature

2/1/19  
Date

PFAD Number: FR007419522E

Small vertical text on the right edge of the page, likely a page number or document identifier.

**TYPES OF DOMESTIC VIOLENCE**  
CHECKLIST ATTACHMENT TO PROTECTION FROM ABUSE PETITION

Instructions: For each type of abuse, please circle Yes if it applies to your case or circle No if it does not apply. Follow a similar pattern when answering whether you were hurt, and whether the abuse was known by the police. Please add date (if known) and/or how often each type of abuse occurred, such as frequently, sometimes, or rarely.

Did the Defendant do or threaten to do any of the following?	Yes	No	How often did this occur?	Were you hurt?	Was there police contact?
Has the defendant threaten to kill you?	<input checked="" type="radio"/>	<input type="radio"/>	often	yes	yes - he regularly threatened to kill me and my daughter
Using any weapon (including, but not limited to a gun)	<input checked="" type="radio"/>	<input type="radio"/>	often	intimidated	
Threat by displaying or pointing a weapon	<input checked="" type="radio"/>	<input type="radio"/>	often	intimidated	
Choking or strangling (any grabbing of the neck)	<input type="radio"/>	<input checked="" type="radio"/>			
Threat to injure self or others	<input checked="" type="radio"/>	<input type="radio"/>	very often		
Forcing sexual contact	<input checked="" type="radio"/>	<input type="radio"/>			
Punching	<input checked="" type="radio"/>	<input type="radio"/>			yes
Kicking	<input type="radio"/>	<input checked="" type="radio"/>			
Slapping	<input type="radio"/>	<input checked="" type="radio"/>			
Biting	<input type="radio"/>	<input checked="" type="radio"/>			
Physically restraining or holding down the victim	<input type="radio"/>	<input checked="" type="radio"/>			
Grabbing, shoving or pushing	<input checked="" type="radio"/>	<input type="radio"/>	often -		
Receiving threatening or harassing phone calls	<input checked="" type="radio"/>	<input type="radio"/>	often -	including texts + emails too	
Forcing to stay in a closet, room, home, other location	<input type="radio"/>	<input checked="" type="radio"/>			
Threat by cruelty to animals	<input checked="" type="radio"/>	<input type="radio"/>	often (my dog)	he threatened to kill my dog	
Physically abusing children in the household	<input checked="" type="radio"/>	<input type="radio"/>			yes (witnessing domestic violence)
Sexually abusing children in the household	<input type="radio"/>	<input checked="" type="radio"/>			
Threat by following	<input checked="" type="radio"/>	<input type="radio"/>	yes		
Threat by damage to property	<input checked="" type="radio"/>	<input type="radio"/>	very often		
Name calling or use of obscenities	<input checked="" type="radio"/>	<input type="radio"/>	very often	severe verbal + emotional abuse	
Have you left the defendant after living together during the past year?	<input type="radio"/>	<input checked="" type="radio"/>			
Has the physical violence increased in severity or in frequency over the past year?	<input type="radio"/>	<input checked="" type="radio"/>			
Does the defendant have access to weapons?	<input checked="" type="radio"/>	<input type="radio"/>	many weapons		
Is the defendant employed?	<input checked="" type="radio"/>	<input type="radio"/>	unknown		
Has the defendant avoided being arrested for domestic violence?	<input checked="" type="radio"/>	<input type="radio"/>			yes in 2012
Do you have a minor child that is not also the defendant's child?	<input type="radio"/>	<input checked="" type="radio"/>			

Signature of Petitioner/Filer Jen M K Date 2/1/19

# **APPENDIX**

## **C**

IN THE COURT OF COMMON PLEAS  
CENTRE COUNTY, PENNSYLVANIA  
CIVIL DIVISION - LAW

HEIDI BRUSH : NO. 2012-3103  
VS :  
LELAND FELDMAN :

TRANSCRIPT OF PROCEEDINGS  
(Custody)

BEFORE: Pamela A. Ruest, Judge

DATE: April 11, 2014

PLACE: Centre County Courthouse  
Courtroom No. 2  
102 South Allegheny Street  
Bellefonte, PA 16823

APPEARANCES:

FOR THE PLAINTIFF:  
Jennifer P. Bierly, Esquire

FOR THE DEFENDANT:  
Mark S. Weaver, Esquire

NOTES BY: Brittany Curchoe  
Official Court Reporter  
Centre County Courthouse  
102 S. Allegheny Street  
Bellefonte, PA 16823  
814-355-6734 OR FAX 814-548-1158

COPY

1 Q. Did you talk to any child welfare  
2 agencies about that?

3 A. Nope.

4 Q. When you met -- now this November 1  
5 incident of 2008 involved a punch to the  
6 chest a single time by Mr. Feldman on you,  
7 correct?

8 A. Yes.

9 Q. Did you call the police after that  
10 incident?

11 A. Yes.

12 Q. When you were discussing with the  
13 police what had happened, isn't it true you  
14 didn't mention any prior incidents of  
15 physical abuse with him?

16 A. I think if you review the report  
17 there is probably something in there about  
18 that.

19 Q. Let's do that.

20 A. Okay.

21 Q. Do you recall that you were  
22 interviewed by certain police officers on  
23 that day?

24 A. Yes.

25 Q. And once again, you were in

1 Colorado, correct?

2 A. (Witness indicating yes.)

3 Q. Does a Deputy Lester --

4 A. I really can't recall who was  
5 involved. There were a number of --

6 Q. So you spoke to a number of -- I  
7 think they're sheriffs, deputy sheriffs?

8 A. They are, right.

9 Q. So I have -- but you did talk with  
10 certain deputies that day, correct?

11 A. At least two, I think.

12 Q. I have marked here -- I have the  
13 Affidavit of Probable Cause that was filed  
14 as a result of that incident. I'd like you  
15 to, if you can, read between the brackets  
16 that I put into that Affidavit.

17 A. Deputy Lester asked Heidi how long  
18 they had been having --

19 THE COURT: Slower.

20 THE WITNESS: Oh, I'm sorry. Deputy  
21 Lester asked Heidi how long they had been  
22 having trouble with their marriage.

23 Heidi said that they had not been  
24 getting along for a while. She said that  
25 they have argued many times in the past and

1 that the arguments were much more intense  
2 than this one.

3 Heidi said that she had asked Leland  
4 many times in the past to leave the house,  
5 to give her some space. Heidi stated that  
6 Leland would never leave and that he said  
7 the only way he was leaving was if the  
8 police showed up.

9 BY MR. WEAVER:

10 Q. Thank you. I'll let your attorney  
11 review the rest of this Affidavit.

12 Ma'am, at no time at this incident  
13 when you were speaking with the police did  
14 you ever tell them about any prior incidents  
15 of physical abuse.

16 A. That doesn't -- I don't know what --  
17 the passage I just read doesn't say I didn't  
18 receive any abuse. It doesn't say that at  
19 all.

20 It says some of the prior arguments  
21 that we had were even more intense.

22 Q. Right. So you had arguments, but  
23 clearly you of course being somebody who is  
24 very schooled in the language and  
25 communicating would have been very specific

1 about telling them about --

2 A. That's not a verbatim transcript of  
3 what I said, though.

4 Q. So that's inaccurate?

5 A. It's not necessarily inaccurate. It  
6 doesn't say one way or another whether there  
7 was abuse in the past.

8 Q. Well, I'll let your attorney have a  
9 look at that, and maybe she can find a  
10 passage where you do mention any physical  
11 abuse, but --

12 A. I will say very specifically he had  
13 not struck me and he had not punched me  
14 before. That does not mean there was not  
15 prior abuse or threats of killing me.

16 Q. Any of those threats of killing you,  
17 were they ever reported to law enforcement?

18 A. No, they weren't.

19 THE COURT: You both --

20 THE WITNESS: They were reported to  
21 friends, though.

22 THE COURT: You both need to not cut  
23 off each other.

24 THE WITNESS: Okay, sorry.

25 THE COURT: The court reporter has

# **APPENDIX**

## **D**

IN THE COURT OF COMMON PLEAS  
CENTRE COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

HEIDI BRUSH : NO. 2019-310

VS :

LELAND FELDMAN :

TRANSCRIPT OF PROCEEDINGS  
(PFA Hearing)

BEFORE: Katherine V. Oliver, Judge

DATE: February 25, 2019

PLACE: Centre County Courthouse  
Courtroom No. 3  
102 South Allegheny Street  
Bellefonte, PA 16823

APPEARANCES:

FOR THE PLAINTIFF:  
Abigail Jones, Esquire

FOR THE DEFENDANT:  
Pro Se

NOTES BY: Patricia A. Grey, RPR  
Official Court Reporter  
Room 103, Centre County Courthouse  
102 South Allegheny Street  
Bellefonte, PA 16823  
814-355-6734 OR FAX 814-548-1158

1 MR. FELDMAN: Thank you.

2 BY MR. FELDMAN:

3 Q. Did you fill out an abuse checklist on or  
4 about February 1st of 2019?

5 A. Yes.

6 Q. Has the defendant abused you by slapping  
7 with an open hand?

8 MS. JONES: Objection. Relevance.

9 THE COURT: Overruled.

10 THE WITNESS: Yes, I think so. I mean,  
11 there have been several times.

12 BY MR. FELDMAN:

13 Q. Has the defendant ever abused you by  
14 forcing you to stay in a closet, room, home, or  
15 location?

16 A. No.

17 Q. Has the defendant ever abused you by  
18 physically restraining or holding you down?

19 A. I have been restrained by you, yes.

20 Q. Your answer to that question is yes?

21 A. The question itself is a little vague.

22 So, at one point he, like, hit me like this, like, kind  
23 of like a side thing and when I'm in the car. So, I  
24 don't know if that's being restrained or, like, hit. I  
25 don't know. I don't know.

1           A.           Yes.

2           Q.           Rifle?

3           A.           No.

4           Q.           Shotgun?

5           A.           No.

6           Q.           Just a handgun?

7           A.           Mostly handguns, yeah.

8           Q.           What else?

9           A.           The way I would answer that question is  
10 at the time we were married, he was a police officer and  
11 would regularly be wearing a gun. And at times he would  
12 threaten to kill me while sort of like displaying his  
13 gun, that kind of thing. He had many, many firearms in  
14 the house throughout. And the way he would sort of show  
15 it as he was threatening or throwing something on the  
16 floor or -- it happened so many times. I mean, it would  
17 be -- that I consider being threatened. That's how I  
18 answer that question.

19          Q.           Have you ever suffered abuse by the  
20 defendant using a weapon?

21          A.           No.

22          Q.           Has the defendant ever physically abused  
23 children in the household?

24          A.           The way I would answer that is when you  
25 were living in the same house as me and AAB, and you

1 were abusing me in the State of Colorado, that is  
2 classified as child abuse. So, yes, I consider that  
3 child abuse. Having AAB watch me being beaten or in  
4 any way abused, from you, is considered child abuse.

5 Q. That's not the question. The question is  
6 has the defendant ever --

7 MS. JONES: Objection. Asked and  
8 answered.

9 MR. FELDMAN: -- physically abused  
10 children in the household?

11 THE COURT: Okay. Yeah, the objection is  
12 sustained. She's answered your question. Move on.

13 BY MR. FELDMAN:

14 Q. Does the defendant have access to  
15 weapons?

16 A. I would imagine, yes, but it's unknown to  
17 me what you have access to.

18 Q. Has the defendant avoided being arrested  
19 for domestic violence?

20 MS. JONES: Objection. Relevance.

21 THE COURT: Overruled.

22 THE WITNESS: Can you repeat that  
23 question?

24 BY MR. FELDMAN:

25 Q. Has the defendant avoided being arrested

1 for domestic violence?

2 A. I don't know.

3 MR. FELDMAN: I have two documents I wish  
4 to place into evidence, Your Honor.

5 THE COURT: Show a copy to Ms. Brush's  
6 counsel please.

7 MR. FELDMAN: Yes, ma'am.

8 Mark them Exhibit 1?

9 THE COURT: Yes. You're going to mark  
10 them Defendant's 1. So D-1 please.

11 MR. FELDMAN: And the second one D-2?

12 THE COURT: Yes, sir.

13 MR. FELDMAN: Thank you.

14 THE COURT: You are asking to introduce  
15 what you have labeled Defendant's D-1 and D-2; is that  
16 correct?

17 MR. FELDMAN: Yes, ma'am.

18 THE COURT: Is there any objection to the  
19 admission of D-1 and D-2?

20 MS. JONES: If I --

21 THE COURT: You can have a moment to look  
22 at them, yeah.

23 MS. JONES: Thanks.

24 Can you confirm these are all part of the  
25 filing that was made by Ms. Brush on the first -- were

# **APPENDIX**

## **E**

IN THE COURT OF COMMON PLEAS OF FAYETTE COUNTY, PA

HEIDI BRUSH-FELDMAN,  
Plaintiff,

vs.

LELAND FELDMAN,  
Defendant.

) CIVIL ACTION - LAW  
)  
)

) No. 1686 of 2009 G.D.  
)

) Judge Gerald R. Solomon  
)

CONSENT CUSTODY ORDER OF COURT

AND NOW, to wit, this 15 day of October, 2009, with the consent of the parties and their counsel, IT IS HEREBY ORDERED, ADJUDGED and DECREED that:

1. Shared legal custody of the parties' minor child, namely, [REDACTED] *AAB*

*AAB* [REDACTED] born [REDACTED] *AAB* is hereby awarded to the Plaintiff/Mother and Defendant/Father.

2. The Plaintiff/Mother shall have primary physical custody of the minor child.

3. The Defendant/Father is awarded partial physical custody of the parties' minor child as Plaintiff/Mother and Defendant/Father may agree.

4. The Child Custody Mediation Conference scheduled for October 15, 2009 is hereby CANCELED.

FILED  
2009 OCT 15 P 2:30  
CASEY M. TERHALTER  
PROTHONOTARY

*attest*

*[Signature]*  
Prothonotary

BY THE COURT:

*[Signature]* J.

CONSENTING:

*[Signature]*  
Heidi Brush-Feldman, Plaintiff

*Leland C. Feldman*  
Leland Feldman, Defendant

*[Signature]*  
Brian P. Cavanaugh, Esq.  
Attorney for Plaintiff

*[Signature]*  
Mark K. Gubinsky, Esq.  
Attorney for Defendant

TRUE AND ATTESTED COPY  
*[Signature]*  
PROTHO NOTARY