UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACOB TEITELBAUM, individually and as father to CHILD A and CHILD B,

PLAINTIFF

-against-

JUDA KATZ; CHAYA KATZ; JOEL TENNENBAUM; BLUMA TENNENBAUM; DAVID RUBENSTEIN; KIRYAS JOEL COMM AMBULANCE CRP; ATTY. MARIA PETRIZIO; CHILDREN'S RIGHTS SOCIETY OF ORANGE COUNTY; ATTY. KIM PAVLOVIC; ATTY JOHN FRANCIS X. BURKE; CHILD PROTECTIVE SERVICES OF ORANGE COUNTY; DEPARTMENT OF SOCIAL SERVICES OF ORANGE COUNTY; CHRISTINE BRUNET; ATTY. STEPHANIE BAZILEOR; JOHN DOES 1 THROUGH 95; JANE DOES 1 THROUGH 20,

DEFENDANTS

CIVIL ACTION NO. 12 CV 02858 (VB)

AFFIDAVIT IN SUPPORT OF MOTION TO APPOINT NEXT FRIEND

Ben Friedman the undersigned under penalties of perjury affirms the following;

1. I am an individual over the age of eighteen years of age, residing in Orange County, New York.

2. I am a close friend of Plaintiff, Jacob Teitelbaum, whom I have known for the past six to seven years, and I have been fully involved with Plaintiff since the conspiracy against his Civil Rights started in 2010.

3. Plaintiff filed this action on April 11th 2012, I helped bring this action. All pleadings including the complaint have been crafted and prepared with the assistance of plaintiff's friends and myself.

4. Since this action started, Plaintiff has continually been threatened, intimidated, and harassed by the conspirators, in a multitude of ways, in an effort to force him to abandon this action.

5. Plaintiff and his minor children are incompetent to pursue this action on their own, an immediate Gaurdian Ad Litem or a Next-Friend is required to stop this case from extinction, to preserve Plaintiffs and his children's rights in this court, and to allow an appeal on his behalf if it is called for.

6. Plaintiff is completely illiterate in the English language, he cannot read, write or substantially communicate in the English language. Additionally, he is illiterate in court procedure, he cannot litigate even under normal circumstances. He cannot read or understand pleadings, let alone formulate arguments or pleadings in English.

7. Plaintiff wrote to this court (by way of example) about his literacy in-competency in the amended complaint on Pg. 2 - ¶¶ 2, and on Pg. 26 - ¶¶ 202, and in a letter dated Dec 24th 2012 (Exhibit A), and a subsequent letter dated Jan. 8th 2012, (Exhibit B).

8. Plaintiff, although he deems himself normal and functional, is now totally incapable to pursue this or any other legal action and litigation due to the strong pressure the litigation has puts on him, coupled with the family court litigation, as well as his family breakdown, which is tearing him apart and which can affect any person under such circumstances in a most adverse way.

9. Additionally, the Defendants herein have argued, determined, and established through their actions, and by submitting statements on the record in this action, that Plaintiff is mentally incompetent, and have done so with medical experts, (the undersigned is neither refuting nor admitting to its truth or legitimacy, it is the rather the duty of this court to determine if Plaintiff is incompetent to pursue this action to protect his rights).

10. During the Court appearance on July 2nd 2012, the Defendants had told the Court that Plaintiff is mentally incompetent, and that the County, through their mental health experts including Dr. Tuckman who did a mental health forensics by Family court order, deemed and determined Plaintiff to be mentally incompetent.

11. The record is full of statements made by the defendants stating that the plaintiff is mentally incompetent, by way of example, see defendant Orange County (Docket

74-12, (Exhibit L)), since this motion is filed under emergency basis, I can point out more if the if the court so desire.

12. Plaintiff and his friend have alerted the Court, on numerous occasions, in letters or pleadings, including at the July 2nd, 2012 court appearance, that Plaintiff is incompetent, incapable to litigate himself due to him being illiterate and uncommunicative, and due to the terror, trauma, emotional turmoil, mental anguish, and extreme fear that the Defendants and conspirators have subjected him designed to incapacitate him and to stop this action. The court acknowledged this and has allowed me to assist the Plaintiff with this action and to speak in court for him.

13. On June 6th 2012, Plaintiff wrote to the Court attached as (Exhibit C) that he became the victim of false criminal charges filed in the local Justice court by Plaintiff's wife who brought these charges on the behest of the conspirators in order to terrorize Plaintiff, and to cause him to withdraw his Complaint.

14. On June 25th 2012 Plaintiff wrote again attached as (Exhibit D) to further detail some of the ongoing terror and false charges.

15. On July 2nd during the court appearance, I gave the Court a letter regarding the terror Plaintiff is subjected to, which the Court docketed and is attached as (Exhibit E).

16. At the same time, while in Court, the Orange County Attorney stated he will file a Motion to Dismiss, the Court informed the parties it would proceed to discovery nonetheless.

17. This court indeed has shown, since July 2nd 2012,, that it cares and is mindful of the Plaintiff's terror, it somehow succeeded in lessening and or diminishing the scope and severity of the terror for several months, it gave Plaintiff a sense of protection.

18. Between July 19th and August 9th 2012, numerous Defendants filed their Motions to Dismiss. On July 20th 2012. On November 5th 2012, Plaintiff filed his opposition to the pending Motions to Dismiss, (Discovery was subsequently denied pending the motions to dismiss).

19. Since Plaintiff filed his opposition to the defendants Motions to dismiss in November 2012, the terror renewed with more vigor, to stop this action.

20. On July 20th 2012, Plaintiff filed a letter (Docket # 35), requesting the Court to appoint a Next-Friend to act on his behalf; the Defendants never disputed that fact.

21. On December 24th 2012, Plaintiff wrote to the Court, attached as (Exhibit F), describing the escalation of terror within the community and through the other

Defendants, including by pressuring and involving Plaintiff's wife again to terrorize Plaintiff and to cut Plaintiff off from his friends all aimed at stopping this action, Plaintiff asked the court to proceed to discovery immediately.

22. On January 8th 2013, Plaintiff wrote to the Court attached as (Exhibit B), informing that the conspirators were blocking Plaintiff from communicating with his friend/s who help him with this action, to stop this action from proceeding.

23. On January 27th 2013, Plaintiff wrote to the Court attached as (Exhibit G), informing how the conspirators have now managed to terrorize Plaintiff through eviction from his home with threats, as they had threatened to do in the past, of what they would do if he kept up this action.

24. On said date, Plaintiff also wrote asking for the court to allow him to be represented through his friend due to the terror, attached as (Docket # 134).

25. On February 11th 2013, Plaintiff wrote to the Court attached as (Exhibit H), detailing how the conspirators want to cut Plaintiff from his friends helping him with this action, so that this action would come to a stop.

26. Immediately following the court's Feb 11th 2012 decision dismissing Plaintiff's complaint, Plaintiff felt as if the Court turned it's back on him through dismissing his complaint, and giving rise to a new pattern and further terror from the conspirators and Defendants, as more fully explained in a letter to the Chief Judge dated Feb. 20th 2013, (copying this Court on the letter), attached as (Exhibit I).

27. Plaintiff then became extremely vulnerable, in having lost the Court's protection and the conspirators and Defendants now perceive that they have a green light to terrorize plaintiff into stopping the remainder of this action, or from pursuing Appeals if necessary, since this action was not fully dismissed and further action pending as to various Defendants and a Motion for Reconsideration. However, without having a Guardian or Next-Friend to protect and shield Plaintiff from losing his rights and being subjected to further terror, this left Plaintiff severely exposed to further terror from the conspirators to continue attack him to stop this action.

28. On March 6th, during the morning hours, the undersigned got a frantic phone call from the Plaintiff, stating that he is currently in Brooklyn, when I asked Plaintiff if he is settled, he replied in a troubling tone that this is not the case, in brief words Plaintiff went on to say that he can no longer communicate with myself, that the conspirators have approached him the day before and placed him under severe pressure and intimidation, he was taken to a Mr. David Hollander in Kiryas Joel, who informed him that he is directing him to immediately leave the village of Kiryas Joel immediately and that he is not to return or step foot in Kiryas Joel for a period not less than six months, he added that he has the support of all Rabbis for this, Plaintiff was then taken out of Kiryas Joel and taken to Brooklyn.

29. On Thursday March 7th 2013 in the evening, Plaintiff called the undersigned again, stating again that he is not settled and not physically o.k., that he is under constant control and intimidation, that he cannot communicate with me anymore, he is very afraid and in extreme fear, he reiterated a few times, that I shall not tell anyone that he managed to call me, as he is afraid they should not find out, he then added that he was told and directed to leave Kiryas Joel for the sole purpose that he be cut off from me.

30. The undersigned has effectively no means to contact Plaintiff currently, neither by phone nor by mail and neither can Plaintiff be served with court papers through my address, since Plaintiff is under the sole control of the Conspirators/Defendants.

31. The undersigned has known and was personally acquainted with David Hollander, and was intimately involved with him, David is personally known to have the power to intimidate and frighten a person so that it appears very true.

32. Additionally, personally known to me, David Hollander is intimately involved and aligned with one of the main conspirators in this action within the community, working together in marriage reconciliation or breakup.

33. My understanding from the Plaintiff is that anything the Plaintiff does at this point, is under the control and influence of the Conspirators/Defendants, and under duress.

34. Plaintiff, as a result of not having been represented through a guardian or Next Friend which would shield the Plaintiff from such terror, is now very exposed and subjected to terror and manipulation.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief.

Dated: March 08, 2013

Benzion P. Friedman
Jacob Teitelbaum, Plaintiff Pro Se
5 Leipnik Way, #102
Monroe, N.Y. 10950
845-782-7830

From: Jacob Teitelbaum
C/O Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

To: The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York, 10601

Re: Jacob Tennenbaum Vs. Juda Katz et al. 12-cv-2858 VB

Dear Judge Briccetti,

I am Jacob Teitelbaum, Plaintiff in this action. I had filed the above captioned action with this Honorable Court on Apr 11th 2012, and I have made this Court aware that on prior occasions I have been threatened, intimidated, and harassed in an attempt to force me to withdraw my complaint. However, this situation has gained a new immediacy with renewed and escalated attempts to force me to with draw my complaint here.

On December 14, 2012 a hearing was held in the Family Court of Orange County, at hearing at which I was not allowed. This court had previously issued an order that as a ProSe defendant I was not allowed to appear, contact the court, or have any involvement in the custody proceedings involving my children. (I have attached the Order from that court) I have been told by my wife that at that hearing, and at the insistence of many of the named and unnamed Defendants in my Federal action, it was decided that if she removed me from our marital residence she could regain custody of our children. Additionally she asserts that she was told by a Rabbi, who is either a named or unnamed Defendant and conspirator, that she should do all within her ability to cut off my contact from those who are assisting me with this action. Towards that end she has taken my cell phone and, by her own account, removed it from our

residence and will not return it to me. And again, she asserts that she is doing this at the insistence of her Rabbi.

Your Honor, as the various Defendants have moved for dismissal, some more timely than others, there is an abundance of evidence that the named and unnamed Defendants in my action continue to work in concert, conspiring with the powers that be in our community to destroy my family. Even the Family Court has not kept me posted on actions that directly affect my rights in my children, they have ordered me not to participate unless I do so with their appointed agent as my attorney. Additionally, that same court has denied me a translator even though I speak very little English, clearly in violation of my 6th Amendment Rights.

You Honor, the ongoing conspiracy and the violations of my constitutional rights goes on unabated and unaffected by this action that the Defendants apparently believe they will get dismissed because, as a ProSe litigant, I am not legally up to par with them. In fact it appears to have escalated in an attempt to coerce me to abandon this Federal Action. I ask Your Honor to consider the ongoing violations of my Rights and to allow me proceed to discover against all of the Defendants as dismissal at this time and with their ongoing individual and joint behavior would seriously compromise this Plaintiff's ability to protect his family and himself from the ongoing harm. Thank you for your time and consideration.

Respectfully Submitted,

Dated December 24, 2012, Monroe, NY.

Jacob Teitelbaum,
Plaintiff, ProSe

From: Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

To: The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York, 10601

Re: Jacob Teitelbaum Vs. Juda Katz et al. 12-cv-2858 VB

Dear Judge Briccetti,

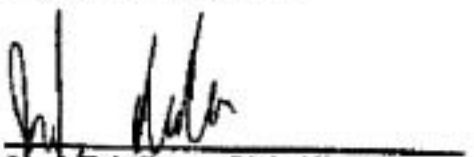
I am Jacob Teitelbaum, Plaintiff in this action and I am writing the Court to bring to Your Honor's attention a matter that I had raised in a previous letter to the Court but which has now risen to a level that is directly interfering with my ability to effectively move forward in this matter.

Under the direction of various parties in the local religious community (various unnamed John Doe Defendants) and under the guise of enabling her to regain custody of our children my wife has taken my cell phone, my money, and when I attempt to use the home phone she listens in on my calls. This is all done in an attempt to compel me to discontinue this action by taking away my ability to be in contact with my friend, Ben Friedman. My wife has purportedly turned my phone over to a Rabbi and tells me that she is being instructed to do all of this by various Rabbis and other religious community leaders.

As this Court is aware I have limited English communication skills and have relied on my friend Ben Friedman to assist me in this and other matters. The attempts to limit or eliminate my contact with those who are helping me through these matters is actually a direct attempt in interfere with the judicial process. I am asking Your Honor to afford me whatever help is

available by and through this Court to ensure that my right to move forward is not continued to be interfered with. I thank Your Honor for his time and attention to this matter.

Respectfully Submitted,



Jacob Teitelbaum, Plaintiff, ProSe

Dated January 8, 2013, Monroe, NY.

Exhibit

C

From: Jacob Teitelbaum
Co Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

To: The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York, 10601

Re: Jacob Tennenbaum Vs. Juda Katz et al. 12-cv-2858 VB

Dear Judge Briccetti,

I am Jacob Teitelbaum, Plaintiff in this action.

I had filed the above captioned action with this Honorable Court on Apr 11th 2012, and I have, since that time, been threatened, intimidated, and harassed in an attempt to force me to withdraw my complaint.

Today these actions reach a crescendo when I became the victim of false charges filed in the local criminal court, being brought by my wife to get me out of the house. The sole purpose of the complaint is that I stop the Federal action; my wife has become a token, used by some of the parties to the Federal action, who are attempting to force me to withdraw the action (this was part of the original plan by the parties to this action, as detailed in my complaint).

I am sacred for my personal safety at this point and I urgently and respectfully ask this Honorable Court to have this investigated by the appropriate Federal agency, to protect myself, or in any other manner the Court finds suitable and proper.

Dated at Monroe, in the County of Orange and State of New York this 6 day of June 2012.

Sincerely,

Jacob Teitelbaum

Attached is copy of the charges.

STATE OF NEW YORK

TOWN COURT

COUNTY OF ORANGE

TOWN of MONROE

Defendant: NA
(Relationship to alleged victim)

Alleged Victim: NA
(Relationship to defendant)

THE PEOPLE OF THE STATE OF NEW YORK

-VS.-

JACOB TEITELBAUM — Date of Birth 1/24/1971

Defendant(s)

ACCUSATION

BE IT KNOWN THAT, by this INFORMATION, DESMOND L LEWIN, as the Complainant herein, STATIONED at SP MONROE accuses the above mentioned Defendant(s), with having committed the VIOLATION of HARASSMENT-2ND:PHYSICAL CNTACT in violation of Section 240.26, Subdivision 01 of the PENAL Law of the State of New York.

That on or about 6/5/2012 at about 02:00 AM

in the TOWN of MONROE, County of ORANGE, the defendant(s)

DID INTENTIONALLY, KNOWINGLY AND UNLAWFULLY COMMIT THE VIOLATION OF HARASSMENT-2ND DEGREE: PHYSICAL CONTACT. A PERSON IS GUILTY OF HARASSMENT IN THE SECOND DEGREE WHEN, WITH INTENT TO HARASS, ANNOY OR ALARM ANOTHER PERSON: 1. HE OR SHE STRIKES, SHOVES, KICKS OR OTHERWISE SUBJECTS SUCH OTHER PERSON TO PHYSICAL CONTACT, OR ATTEMPTS OR THREATENS TO DO THE SAME;HARASSMENT IN THE SECOND DEGREE IS A VIOLATION.

FACTS

THE DEFENDANT JACOB TIETELBAUM HAD A VERBAL ARGUMENT WITH HIS WIFE MIRIAM TIETELBAUM WHICH BECAME PHYSICAL. MR. TIETELBAUM DID INTENTIONALLY, KNOWINGLY AND UNLAWFULLY GRAB MRS. MIRIAM TIETELBAUM BY THE ARM AND PUSH HER TO THE FLOOR. ALL OCCURRING AT 20 GETZIL BERGER BLVD. APT 104 IN THE VILLAGE OF KIRYAS JOEL, TOWN OF MONROE, COUNTY OF ORANGE, STATE OF NEW YORK.

The above allegations of fact are made by the Complainant herein on direct knowledge and/or upon information and belief, with the sources of Complainant's information and the grounds for belief being the facts contained in the attached SUPPORTING DEPOSITION(s) of: MIRIAM TEITELBAUM

NOTICE

In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the State of New York punishable as a Class A Misdemeanor. (PL 210.45)

Affirmed under penalty of perjury

this 5th day of JUNE, 2012

Desmond Lewin

COMPLAINANT

--OR--

Subscribes and sworn to before me this _____ day of _____, 20 _____

Exhibit

D

Exhibit

E

From: Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

To: The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York, 10601

Re: Jacob Teitelbaum Vs. Juda Katz et al. 12-cv-2858 VB

Dear Judge Briccetti,

I am Jacob Teitelbaum, Plaintiff in this action.

The following explanation of recent events clarifies my letter dated June 6, 2012 ahead of the July 2, 2012 conference ordered by the Court on June 19, my limitation in the English language makes it difficult for me to verbally explain the following through an interpreter.

Among the different ways the defendants and individuals in the community used to intimidate and harass me are four (4) ways, they have recently increased their efforts, attempting to stop me from this federal action, I briefly explain these with some examples;

1) Continued intimidation and harassment upon my wife targeted to control and intimidate me and more recently to stop this federal action.

2) Involuntary confinement through force and kidnapping.

3) Repeated attempts to remove me from our home.

4) Subjecting my wife to mental health confinement, often for prolonged periods.

One; the defendants have recently began subjecting my wife personally and on the telephone with even greater pressure than before, my wife is continually demanding and pressuring me that I discontinue this federal action, she states that she is being pressured and harassed into doing so.

On or about early June 2012, one day during my conversing with Mr. Ben Friedman in the street, my wife erupted suddenly and hysterically screaming on Mr. Friedman, for his assisting me to bring this federal action, she demanded that Mr. Friedman stop to communicate with me, thereafter at home she continued to be hysterical and scream at me for several days for having started this federal action.

During my telephone conversations at home with Mr. Friedman, my wife interferes by blocking the calls, when I recently got a cell-phone to enable me to talk on the phone, my wife seized it, stating the reason - that I must withdraw this federal action, she also filed the recent false criminal charges in order to stop this federal action as further explained.

Attached is a letter that my wife wrote shortly after she filed the criminal charges against me, the Court should have a better understanding of the situation, the letter names two people who were instrumental in helping me bring this federal action.

Two; the defendants had subjected me in the past to wrongful mental institution confinement. On June 6, 2012, when my wife had filed the criminal charges, defendant

"Hatzalah" entered my home during the early morning hours while I was asleep, they then intimidated me that I will be arrested if I do not voluntarily agree to leave my home with them to be confined into a mental health institution, after refusing to comply with their ridiculous demands, they pressured my wife to arrest me.

I was then arrested and falsely charged with acts that I never committed, my wife later informed me that the goal was to confine me to a mental institution on which she had agreed rather than to arrest me, stating the purpose was to stop my federal action.

Three; the defendants conspired in the past to remove me from the house through my wife, on June 6 after filing the criminal charges she requested that I be removed from the home, she later informed me that this was a calculated plot to stop me from the federal action.

Four; during the prior year while defendants hoped that my wife would succeed to stop me from the religious campaign, she received great support from them, she was not hospitalized during that entire period, however in September of 2011, once she returned my items that she took away from me, now no longer cooperating with them, their hopes of controlling me through her had now vanished, she was then hospitalized shortly thereafter on three separate occasions.

Upon filing my first motion with the Family Court in late Dec, 2011, that the underlying removal of our children were politically motivated, the defendants resumed their attempts to use my wife to control me, intimidating and harassing her repeatedly to remove me from the home, hesitant to do so and unwilling to lose her husband, she became depressed from the pressures, nonetheless she was not hospitalized as she still cooperated with the defendants somewhat.

However once the defendants learned that I started the federal action, my wife was again subjected to severe pressure, she was then hospitalized in mental institution in late April 2012.

Interestingly, on Friday June 1, shortly after the Marshals had mailed the summons and complaint to the defendants on Tuesday May 29, my wife hurriedly came home from the hospital, visibly being very upset, she was very concerned about the federal action, she then insisted and pressured me to immediately cease this federal action, within a mere few days of coming home and after being compelled into filing the false criminal charges against me, she was hospitalized again, she continued to demand and pressure me to discontinue my federal action while she was in the hospital.

I have been harassed by other individuals in the community - who are affiliated to some of the defendants, for bringing this federal action, to a lesser degree however than the above.

My wife has become a tremendous tool and token of the defendants and other individuals to stop this federal action, our children have been kidnapped from us, we have both been kidnapped and wrongfully confined to mental institution, we have suffered humiliation and emotional damage, our liberty is at risk, the Hatzalah and the CPS possess the legal powers to act against myself and my family, they have acted under color of law to harm me and my family under fabricated pretenses, I am unsafe anymore, not knowing what defendants would do next.

I hope to appear on July 2nd, the chances for being physically prevented or blocked from appearing are quite high according to the current intense situation.

Dated June 25, 2012, Monroe, NY.

Sincerely,

Jacob Teitelbaum, Plaintiff

May 11, 2012
(errorneously dated to may on page 1)
yiddish ommitted

To whom this may concern

To the court of Monroe, the KJ public safety, and KJ EMS, and to bais din.

I have a legal problem of harassment from two people of the village of kiryas joel, they are harassing me, my phone line and my husband, for two consecutive years, I was trying to get help but my efforts were in vein, please help me bring these two people to justice.

Benjamin Friedman 3 Leipnik way Monroe NY 10950, Mendel Blum address unknown, he is constantly floating around. I did try numerous times to call police on him and all kind of rabbinical help. Until he finally trapped my husband by exhausting him and instigating him.

I never will and never pressed charges against him, he is a special character and battered, no one shows up for us, that is why he gets caught in their laps, please bring these two criminals to justice as soon as possible. I hereby withdraw all charges against my husband which I never charged against Jacob Teitelbaum, (Rabbi Moshe Jacob Shamshon Teitelbaum).

Sincerely Miriam Teitelbaum

May 11, 2012

To Whom this may Concern:

To The Court of Monroe, The K.J. public Safety and KJ Ems. And to Bes Din.

I have a legal problem of Harrassment from two people of the village of Kiryas Joel. They are Harressing me my plane Ine and my husband for two consecutive years. I wes boying to get help but my efforts, Were in vain. Please help me bring these two people to Justice Benjamin Freidman 3 Lepnick Way Monroe NY 10950

2) MTT 06/01/2012

Mendel Blum address unknown, he is constantly floating around. I did try on numerous times to call police on him and all kind of Rabbinical help. Until he finally trapped my husband by exhausting him and instigating him

I never will and never pressed Charges against him. He is a special character and battered no one stands up for us That is why he gets caught in their laps. Please bring these two criminals and evil people to Justice as soon as possible. I hereby withdraw all Charges against my husband which I never Charged against Rabbi Moshe Jacob Shenstein Fertelbaum Jacob Fertelbaum. Sincerely Miriam Fertelbaum

Exhibit

E

Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

July 2, 2012

To: The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York, 10601

Re: Jacob Teitelbaum vs. Juda Katz et al. 12-cv-2858 VB

Dear Hon. Judge Briccetti,

I am a close friend and supporter of Jacob Teitelbaum, I have been involved in the religious campaign that has sparked a war of intimidation against Jacob, since his children were removed in 2010, I have been trying to protect and help him.

The following crucial facts pertains to the scheduled hearing of today, these events are ongoing and transpired over the past month, apparently done to force the complete closure of his federal action, there is a high risk that Jacob could be silenced and not be able to sustain this federal action, needed to gain the protection he urgently requires.

Due to the nature of those hiding behind this ordeal (individuals not yet identified in the complaint, who are orchestrating the conspiracy while hiding behind the known defendants), It reached a point where I am becoming more helpless to keep helping and protecting him.

A

On June 6th, Miriam Teitelbaum filed criminal charges and had her husband Jacob arrested in conjunction with defendant Hatzuleh, and on the behest of others, (this is the first time historically that a wife in this community would arrest her husband while still living together).

On the same day the Monroe Town Court issued an order, directing Jacob not to intimidate Miriam, while allowing him to remain at home with her.

Jacob left his house that day, out of fear of being charged falsely again with new charges or with violating the protection order, which could potentially turn the crime into a felony.

On June 7th, one day after the charges were filed, Miriam arranged and admitted herself into NY Cornell Westchester Hospital, apparently due to the severe stress of the acts of the day before.

Shortly after Jacob found out that Miriam went into Hospital, he went back into his house and remained until June 28th.

Since his arrest, Jacob had to take cover to be on the run or in hiding to avoid being in public within the community, out of fear, of being framed by others on the behest of the group, in a similar or other way including from being kidnaped, and to avoid ongoing harassment and humiliation, orchestrated by these people, it is easy for them in this close-knit community to incite his and his wife's family as well as others to humiliate and harass him to achieve their goal.

On June 11th, a letter from Miriam surfaced, she wrote among other things that she never will - and never pressed charges against Jacob, and that she withdraws all charges against him.

On June 12th, Jacob received a phone call from Miriam's social worker at the Hospital, advising him that Miriam cannot be discharged from the Hospital to come home, due to the pending criminal charges and the protection order against him and the ongoing fight.

On June 13th, Mrs. Pasternak a family member of Jacob, contacted Jacob by phone and informed him that she is in touch with Miriam and that the Hospital will not allow Miriam to go home, because of her being in a fight with him, Mrs. Pasternak attempted to mediate.

On June 24th, Mrs. Pasternak called Jacob again, requesting him to stop the federal action immediately, she stated that as long as he remains in federal court his wife will not withdraw the criminal charges against him, and that the Hospital would not allow Miriam to come home as long as the charges remain and the fight with him continues.

On June 25th, Jacob was in Monroe Town Court on the criminal charges, for a pre-trial hearing and scheduling, the District Attorney requested an adjournment, stating that he had not been able to communicate with Miriam; the next hearing was scheduled for July 23rd.

On June 28th, Jacob received a call from Miriam, informing him that she is coming home later that day; Jacob immediately left the house, to avoid further confrontation or possible further false charges.

B

On June 22nd, a social worker for the Orange County DSS called Jacob, advising him that if he wants visitation with his children, they will have to arrange for his visitation at a separate time from his wife, due to his criminal charges and the protection order. (Miriam was hospitalized at that time, and DSS knew well that Jacob was not having visitation for a long time prior, for fear of a setup being planned against him by DSS, after an incident at the last visitation he had, amended complaint ¶ (AB) 191 - 198).

On June 27th, the DSS social worker called Jacob again, asking if he wanted visitation that day, the SW did not mention anything about the religious *"Payos Opsheren"* celebration for the younger child taking place at his home on Friday June 29th, (as Jacob was to learn the next day).

On June 28th, during the aforementioned phone call of Miriam, she informed Jacob that the celebration for the child would take place at their house on the following day on Friday the 29th.

She also informed him then, that both his and her family will attend the celebration, she demanded that Jacob be present at that time, Jacob briefly advised her that as long as the fight ensues, he will not participate whatsoever.

As already stated in the amended complaint ¶ (J) 85 - 88, On October 2010 the DSS had after having scheduled for a similar celebration of the older child to take place at Jacobs home, suddenly canceled it to take place at Miriam's parent's home instead, while there were clearly no criminal charges or protection orders against Jacob at the time.

C

These people aren't much different than a Mafiosi group, they continue to challenge, intimidate and silence until successful, covering up their tracks, acting indirectly through others and under color of law, the more cornered they become to being exposed, the more dangerous and unpredictable they become, until exposed.

It is only a question of time, before they can silence Jacob, without immediate court intervention, it ordinarily takes considerable time to reach trial or even formal motion practice to gain some protection, even the mere service of papers on the defendants, let alone to expose those behind - takes time, meanwhile they have ample time to gain control and silence him.

Most people in a similar plight within the community do not reach a point this far to gain protection in federal court, as they are silenced and controlled much earlier, by way of example, in the following two cases, these two individuals were silenced early on before they had a chance to get protection, there are other similar cases unfortunately.

In the recent case of Rubin vs. Rubin et al, in the US Eastern district of NY, 11-cv-1920, where Isaac Rubin had sought protection from the Court, to stop Hatzala groups in Brooklyn from kidnapping him, he was silenced after having filed his federal action, he was kidnapped again and forcefully over-drugged with injections in the hospital where he became severely damaged by the defendants, he eventually withdraw his action after being incapacitated and intimidated, as can be seen somewhat on the court record and upon information and belief.

In another case, criminal cruel kidnappings across state lines on Menachem Blum took place in 2007 and 2009, after he was involved in a religious campaign to avoid losing his religious freedom; the kidnappings were aimed at silencing him.

To sum up, they have succeeded to further their initial goal to terrorize and intimidate Jacob in a scheme to silence his federal action and curtail his ability to gain ultimate protection from this Court, in the following ways among others they managed to;

1. Finally separate him from his wife, which they were trying for the last two years.
2. Remove him from his house, with which they threatened him for some time.
3. Subject him to continued terror, putting his life/liberty at risk, while they are staying under cover.
4. Continue destroying his family, kidnapping his two children away from him, and destroying his wife's health.

I hope the foregoing would enable the Court to get a glimpse of what is really happening, and allow Jacob to receive the protection and freedom he desperately needs.

Respectfully

Ben Friedman

Exhibit

F

From: Jacob Teitelbaum
C/O Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

To: The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York, 10601

Re: Jacob Tennenbaum Vs. Juda Katz et al. 12-cv-2858 VB

Dear Judge Briccetti,

I am Jacob Teitelbaum, Plaintiff in this action. I had filed the above captioned action with this Honorable Court on Apr 11th 2012, and I have made this Court aware that on prior occasions I have been threatened, intimidated, and harassed in an attempt to force me to withdraw my complaint. However, this situation has gained a new immediacy with renewed and escalated attempts to force me to with draw my complaint here.

On December 14, 2012 a hearing was held in the Family Court of Orange County, at hearing at which I was not allowed. This court had previously issued an order that as a ProSe defendant I was not allowed to appear, contact the court, or have any involvement in the custody proceedings involving my children. (I have attached the Order from that court) I have been told by my wife that at that hearing, and at the insistence of many of the named and unnamed Defendants in my Federal action, it was decided that if she removed me from our marital residence she could regain custody of our children. Additionally she asserts that she was told by a Rabbi, who is either a named or unnamed Defendant and conspirator, that she should do all within her ability to cut off my contact from those who are assisting me with this action. Towards that end she has taken my cell phone and, by her own account, removed it from our

residence and will not return it to me. And again, she asserts that she is doing this at the insistence of her Rabbi.

Your Honor, as the various Defendants have moved for dismissal, some more timely than others, there is an abundance of evidence that the named and unnamed Defendants in my action continue to work in concert, conspiring with the powers that be in our community to destroy my family. Even the Family Court has not kept me posted on actions that directly affect my rights in my children, they have ordered me not to participate unless I do so with their appointed agent as my attorney. Additionally, that same court has denied me a translator even though I speak very little English, clearly in violation of my 6th Amendment Rights.

You Honor, the ongoing conspiracy and the violations of my constitutional rights goes on unabated and unaffected by this action that the Defendants apparently believe they will get dismissed because, as a ProSe litigant, I am not legally up to par with them. In fact it appears to have escalated in an attempt to coerce me to abandon this Federal Action. I ask Your Honor to consider the ongoing violations of my Rights and to allow me proceed to discover against all of the Defendants as dismissal at this time and with their ongoing individual and joint behavior would seriously compromise this Plaintiff's ability to protect his family and himself from the ongoing harm. Thank you for your time and consideration.

Respectfully Submitted,

Dated December 24, 2012, Monroe, NY.

Jacob Teitelbaum,
Plaintiff, ProSe

Exhibit

G

From: Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

To: The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York, 10601

Re: Jacob Teitelbaum Vs. Juda Katz et al. 12-cv-2858 VB

Dear Judge Briccetti,

I am Jacob Teitelbaum, Plaintiff in this action.

I am writing to inform the Hon. Court of the most recent terror I am withstanding, further evidencing the conspiracy and plan of the Defendants to inflict immense terror and pain on myself to cause me to withdraw and stop my Federal Court action.

I have already informed the Hon. Court in a letter dated June 6th, and June 25th, 2012, as has Mr. Ben Friedman written on July 2nd, 2012, about the terror I constantly endure from the conspirators, including the false charges my Wife had brought in the Town of Monroe with the assistance of the conspirators, where she was lead to file those false charges in order to stop my Federal Court action, the charges were thereafter dropped as I was informed by the Town of Monroe Court. (Copy of the Letters attached).

I have also informed the Court in the past, about how my Wife is being put under extreme pressure both within the community and through the Orange County Dept. of Social Service to take part in the conspiracy in order to coerce me through pressure and terror,

Apparently as seen from the attached documents, the Defendants and others in the community have already planned this terrorizing event back in August of 2012, by having my Wife then file these false charges, she was now able to fraudulently bring it back through another town, therefore allowing the Defendants and their co-conspirators to instill terror and further their original plan to evict me from the house, during the observance of Shabbos (Saturday) in a mid-winter day of sub-zero temperatures, not having another place where to go.

The conspirators taking the prior order of protection falsely filed in Town of Monroe which had clearly been dropped before, and which my Wife had also clearly expressed that she did not want to file these charges, (a copy of which is attached herewith), had now fraudulently transferred it to the Town of Goshen Court, falsely claiming again that I have violated this prior protection order, an act I was continuously threatened with unless I withdraw from the Federal Court action, and follow their demands to submit to whatever mental treatment and confinement they would ask, as evidenced in the documents (copies attached).

Needless to say, I never had any other dealings positive or negative with the Town of Monro Court, except for twice coming to Town Court just for the purposes of this fraudulent protectio order.

Respectfully Submitted,

Dated January 27, 2013, Monroe, NY.

Jacob Teitelbaum, Plaintiff

F.C.A §§ 430, 550, 655, 828, 1029

GPS 8/2010

ORI No: NY035023J
Order No: 2013-000094
NYSID No:

At a term of the Family Court of the State of New York, held in and for the County of Orange, at Orange County Courthouse 285 Main Street, Goshen, NY 10924, on January 25, 2013

PRESENT: Honorable Andrew P. Bivona

In the Matter of a FAMILY OFFENSE Proceeding

Miriam Teitelbaum (DOB: 10/10/1974),
Petitioner,

- against -

Jacob Teitelbaum (DOB: 01/24/1971),
Respondent.

File # 55083
Docket# O-00355-13

Temporary Order Of Protection

Ex Parte

NOTICE: YOUR FAILURE TO OBEY THIS ORDER MAY SUBJECT YOU TO MANDATORY ARREST AND CRIMINAL PROSECUTION, WHICH MAY RESULT IN YOUR INCARCERATION FOR UP TO SEVEN YEARS FOR CRIMINAL CONTEMPT, AND/OR MAY SUBJECT YOU TO FAMILY COURT PROSECUTION AND INCARCERATION FOR UP TO SIX MONTHS FOR CONTEMPT OF COURT. IF YOU FAIL TO APPEAR IN COURT WHEN YOU ARE REQUIRED TO DO SO, THIS ORDER MAY BE EXTENDED IN YOUR ABSENCE AND THEN CONTINUES IN EFFECT UNTIL A NEW DATE SET BY THE COURT.

A petition under Article 8 of the Family Court Act, having been filed on January 23, 2013 in this Court and good cause having been shown, and Jacob Teitelbaum having not been present in Court,

NOW, THEREFORE, IT IS HEREBY ORDERED that Jacob Teitelbaum (DOB: 01/24/1971) observe the following conditions of behavior:

[01] Stay away from:

[A] Miriam Teitelbaum (DOB: 10/10/1974) - 1000 feet

[B] the home of Miriam Teitelbaum (DOB: 10/10/1974) at 20 Getzel Berger Blvd, #104, Monroe, NY 10950 - 1000 feet;

[02] Refrain from assault, stalking, harassment, aggravated harassment, menacing, reckless endangerment, strangulation, criminal obstruction of breathing or circulation, disorderly conduct, criminal mischief, sexual abuse, sexual misconduct, forcible touching, intimidation, threats or any criminal offense against Miriam Teitelbaum (DOB: 10/10/1974);

[99] Observe such other conditions as are necessary to further the purposes of protection: Police to assist if necessary.;

[99] Observe such other conditions as are necessary to further the purposes of protection: the Respondent, Jacob Teitelbaum (DOB: 01/24/1971) is to immediately remove himself from the residence at 20 Getzel Berger Blvd., #104, Monroe, NY;

It is further ordered that this temporary order of protection shall remain in force until and including July 23, 2013; but if you fail to appear in court on this date, the order may be extended and continue in effect until a new date set by the Court.

Dated: January 25, 2013 **ENTER**

NOTICE OF ENTRY
PLEASE TAKE NOTICE that the within is a true copy of an order entered in the office of the Clerk of the Family Court of the State of New York in the County of Orange on
1/25/13
Chief Clerk of the Family Court

Andrew P. Bivona
Honorable Andrew P. Bivona

The Family Court Act provides that presentation of a copy of this order of protection to any police officer or peace officer acting pursuant to his or her special duties authorizes, and sometimes requires, the officer to arrest a person who is alleged to have violated its terms and to bring him or her before the court to face penalties authorized by law.

Federal law requires that this order is effective outside, as well as inside, New York State. It must be honored and enforced by state and tribal courts, including courts of a state, the District of Columbia, a commonwealth, territory or possession of the United States, if the person restrained by the order is an intimate partner of the protected party and has or will be afforded reasonable notice and opportunity to be heard in accordance with state law sufficient to protect due process rights (18 U.S.C. §§2265, 2266).

It is a federal crime to:

- cross state lines to violate this order or to stalk, harass or commit domestic violence against an intimate partner or family member;
- buy, possess, or transfer a handgun, rifle, shotgun, or other firearm or ammunition while this Order remains in effect (Note: there is a limited exception for military or law enforcement officers but only while they are on duty) ; and
- buy, possess or transfer a handgun, rifle, shotgun or other firearm or ammunition after a conviction of a domestic violence-related crime involving the use or attempted use of physical force or a deadly weapon against an intimate partner or family member, even after this Order has expired (18 U.S.C. §§922(g)(8), 922(g)(9), 2261, 2261A, 2262).

PURSUANT TO SECTION 1113 OF THE FAMILY COURT ACT, AN APPEAL FROM THIS ORDER MUST BE TAKEN WITHIN 30 DAYS OF RECEIPT OF THE ORDER BY APPELLANT IN COURT, 35 DAYS FROM THE DATE OF MAILING OF THE ORDER TO APPELLANT BY THE CLERK OF COURT, OR 30 DAYS AFTER SERVICE BY A PARTY OR THE ATTORNEY FOR THE CHILD UPON THE APPELLANT, WHICHEVER IS EARLIEST.

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF ORANGE

In the Matter of a **Family Offense** Proceeding

Miriam Teitelbaum
Petitioner

against

Jacob Teitelbaum
Respondent

Family File # 55083
Docket # O-355-13

SUMMONS

ORANGE COUNTY SHERIFF'S OFFICE
RECEIVED
2013 JAN 25 P 1:03

IN THE NAME OF THE PEOPLE OF THE STATE OF NEW YORK:

To: Jacob Teitelbaum
20 Getzel Berger Blvd, Apt 104, Monroe, NY 10950

A petition under Article 8 of the Family Court Act having been filed with this Court, and annexed hereto

YOU ARE HEREBY SUMMONED to appear before this court on

Date/Time: 1/30/13 11:00Am
Presiding: Hon. Andrew P. Bivona
Location: Orange County Courthouse
285 Main Street
Goshen, NY 10924

to answer the petition and to be dealt with in accordance with the Family Court Act.

On your failure to appear as herein directed, a warrant may be issued for your arrest.

Dated: 1/23/13

Elizabeth Holbrook
Chief Clerk of the Family Court

NOTICE: Family Court Act 154(C) provides that support, paternity, custody, family offense and child abuse and neglect petitions, in which an order of protection is sought or in which a violation of an order of protection is alleged, may be served outside the State of New York upon a Respondent who is not a resident or domiciliary of the State of New York. In such instance, the exercise of personal jurisdiction over the Respondent is limited to the issue of the request for, or alleged violation of, the order of protection, unless other grounds exist for the exercise of personal jurisdiction over the Respondent. Where the Respondent has been served with this summons and petition and does not appear, the Family Court may proceed to a hearing with respect to issuance or enforcement of the order of protection.

F.C.A. § § 812, 818, 821

Form 8-2
(Family Offense Petition)
(8/2010)

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF ORANGE

Miriam T. Teitelbaum Petitioner,

- against -

Jacob Teitelbaum Respondent,

Docket No. O-355-13
Family File No. 55083

FAMILY OFFENSE PETITION

TO THE FAMILY COURT:

The undersigned Petitioner respectfully states that:

1. a. I reside at [specify address unless confidential]: [1]
20 Getzel Berger Blvd., Monroe, NY 10950

b. The Respondent resides at [specify]:
20 Getzel Berger Blvd., Monroe, NY 10950

2. a. ☒ The Respondent and I are related as follows [check applicable box(es)]:
☒ we are married ☐ we were married
☒ we have a child in common ☐ we are parent and child
☐ we are related by blood or marriage [specify how]:
☐ we are in an intimate relationship (NOT casual social or business acquaintances) [describe]:
☐ we were in an intimate relationship (NOT casual social or business acquaintances) [describe]:

b. ☐ I am a peace officer

3. The Respondent committed the following family offense(s) against me and/or my children, which constitute(s):
☐ Disorderly conduct
☒ Harassment in the first or second degree
☐ Aggravated harassment in the second degree
☐ Assault in the second or third degree
☐ Criminal mischief
☐ Sexual abuse in the second [2] or third degree
☐ Strangulation
☐ Menacing in the second or third degree
☐ Reckless endangerment
☐ Stalking
☐ Attempted assault
☐ Sexual misconduct
☐ Forcible touching
☐ Criminal obstruction of breathing or circulation

[1] If your health or safety or that of your child or children would be put at risk by disclosure of your address or other identifying information, you may apply to the Court for an address confidentiality order by submitting General Form GF-21, which is available on-line at www.nycourts.gov. *See* Family Court Act §154-b.
[2] Where victim is incapable of consent for reason other than being under age 17 [Penal Law §130.60(1)].

[Describe incident, state date, time and place of most recent incident, specify if anyone was injured (how seriously) and if any weapons were used. If there were earlier incidents as well, describe them in additional paragraphs. Use additional sheets where necessary]:
Petitioner states that she has been married to Respondent for 6 yrs. Respondent has a history of verbal and physical abuse towards Petitioner. Respondent is anorexic and refuses to eat or go for any kind of treatment. Respondent has irrational thoughts and becomes violent.

Petitioner states that she was granted an Refrain from Order of Protection in August 2012 by Town of Monroe. On August 2012 EMS responded to their home due to Respondent needing medical assistance due to his not eating. Respondent had become violent with Petitioner and pushed her to the floor. Petitioner believes that his outbursts are due to his anorexia and lack of nutrition. Town of Monroe Police were called to the house by EMS. Town of Monroe Police arrested Respondent because of his outburst and becoming physical towards Petitioner. Petitioner was issued a Order of Protection. Respondent has a court date on February 5, 2013 in the Town of Goshen Court for the above offense. Case is being heard in the Town of Goshen Court because Monroe Court has a negative history with Respondent.

Petitioner states that on January 19, 2013 while she was conducting her religious Saturday service at their home, Respondent became violent. Respondent pushed Petitioner and became physical with her. She was unable to call the police since due to her religion she is not allowed to use the telephone on Saturdays. Respondent kept pushing her and she fell onto the couch, this has happened serveral times in the past.

Petitioner states that she is afraid of Respondent and fears him. Petitioner is requesting the Court for a Stay-A-Way Order of Protection until he gets the appropriate treatment for his anorexia and any other mental disorder. Respondent has threatened Petitioner "if she does something against him she will pay a price".

4. ☒ I have ☐ have not filed a criminal complaint concerning these incident(s). [If so, please indicate status]: August 2012 Town of Monroe Police.

5. [Check applicable box(es)]:

☐ a. I have no children and there are no other children living in my home.

☐ b. The following children live with me (include children who are not yours).

Name	DOB	Relation to Me	Relation to Respondent

☒ c. The following children are mine but do not live with me.

Name	DOB	Lives With	Child's Relation to Respondent
Shulen Fried	5/1/95	Boarding School	Step-Son
Nussen Teitelbaum	10/14/07	Uncle	Son
Yechoskel Teitelbaum	7/1/09	Uncle	Son

☐ d. The Respondent committed family offenses against the above child or children as follows [describe, including name(s) of child or children, nature of offense(s) and date(s)]: [3]

[Check boxes and complete any of the following paragraphs 6-13 that apply to you. Skip any that do not apply to you.]

☐ 6. The Respondent has acted in a way I consider dangerous or threatening to me, my children or any member of my family, in addition to the incident described in question 3, as follows [describe]:

☒ 7. The Respondent was found to have violated an Order of Protection issued on behalf of me or members of my family or household as follows [describe]: Order of Protection was issued in August 2012, Petitioner believes Order expired.

☐ 8. The Respondent owns or has access to guns as follows [describe]: N/A

9. ☐ a. The Respondent has a gun license or pistol permit for the following gun(s) as follows [describe]: N/A

☐ b. The Respondent has a gun license or permit application pending as follows [describe]: N/A

☐ c. The Respondent carries a gun on his or her job as follows [describe]:

10. ☐ a. The Respondent threatened [check applicable box(es)]:
☐ me ☐ my child or children [specify]:
☐ a member or members of my household [specify]:
with a gun or dangerous instrument or object as follows [specify]:

☐ b. There is a substantial risk that Respondent would use or threaten to use a firearm or dangerous instrument or object against me, my child(ren) or member of my household on the basis of the following facts and for the following reasons [describe]:

☒ 11. The following court cases are pending between me and the Respondent [specify court, docket or index number, nature of action and status, if known]: Feburary 5, 2013 in Town of Goshen for Domestic Violence.

[3] Family Offenses include the crimes of assault or attempted assault, aggravated harassment or harassment, disorderly conduct, menacing, reckless endangerment, stalking, sexual abuse, sexual misconduct, forcible touching, strangulation, criminal obstruction of breathing or blood circulation, or criminal mischief.

☐ 12. The Respondent has the following criminal convictions [specify, including date, crime, sentence and court, if known]: N/A

☐ 13. [Applicable where protection is sought for pet(s)]:
a. The following pets live in my household [specify name(s) and type(s)]: N/A

b. The Respondent injured or tried or threatened to injure pets in my household as follows [describe]:

14. I have not made any previous application to any court or judge for the relief requested in this petition, (except [specify the relief, if any, granted and the date of such relief; delete if inapplicable]:).

WHEREFORE, Petitioner respectfully requests this Court to:

a. adjudge the Respondent to have committed the family offense(s) alleged;
b. enter an order of protection, specifying conditions of behavior to be observed by the Respondent in accordance with Section 842 of the Family Court Act;
c. enter a finding of aggravated circumstances [delete if inapplicable];
d. enter a temporary order of child support in accordance with Family Court Act §828(4) [delete if inapplicable];
e. order such other and further relief as to the Court seems just and proper.

Dated: January 23, 2013

Miriam T. Teitelbaum /k M Teitelb
Petitioner: (print or type name) / Signature

Petitioner's Attorney, if any, (print or type name) / Signature

Address and telephone number of Attorney, if any

VERIFICATION

STATE OF NEW YORK)
ss.: Miriam T. Teitelbaum
COUNTY OF ORANGE)

being duly sworn, says that (she) is the Petitioner in the above-named proceeding and that the foregoing petition is true to (her) own knowledge, except as to matters stated to be alleged on information and belief and as to those matters (she) believe(s) them to be true.

Miriam T. Teitelbaum / _____
Petitioner: typed or printed name / Signature

Sworn to before me this
day of , 20 .

_____
(Deputy) Clerk of the Family Court
Notary Public

Exhibit

H

Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York, 10601

Re: Jacob Teitelbaum Vs. Juda Katz et al. 12-cv-2858 VB

Dear Judge Briccetti,

I am Jacob Teitelbaum, the Plaintiff in this action, and I am writing the Court to bring to Your Honor's attention a matter that I had raised in a previous letter to the Court but which has now risen to a level that I am trapped by the Defendants, the information is as follows:

According to Torah Law , as practiced in our communities, a husband is not allowed to remarry before giving his present wife a Get (religious divorce), even if they have already obtained a civil divorce. Under ordinary circumstances the willingness of the wife to accept such a Get would be a must, however, there are some exceptions where a husband can remarry even his wife does not agree to the Get. For example when the wife does not want to live with the husband and does not want to accept a Get, the Rabbinical Court can permit the husband to remarry without such a Get.

From what I have learned in the past two weeks, since my Wife brought the Order of Protection which is based on false allegations, she is not willing to either live with me or to accept a Get. That is, unless, 1) I break up my ties with my friend Ben Friedman, 2) stop my religious campaign against forced divorces, and, 3) withdraw this action. Additionally, the Rabbinical Court is not willing to fight these Defendants and co-conspirators and grant me permission to remarry without a Get. Despite this, the Rabbinical Court has expressly stated they will

not involve, although My Wife would not accept a Get, and she has stated that she will not continue to live with me for the next two years unless the above three conditions are met, this I have verified according to her own account. These and similar tactics are used only against people in the community against whom it is certain that they will not break the religious laws and cheat, they would not risk and take a chance to test those who may cheat and therefore be undeterred by such intimidating action, since they know I will not break the religious laws, they feel comfortable to keep me hostage in their trap.

At same time, these Defendants have their say against the Plaintiff all over the community, especially these two; 1) Ms. Pasternak, who is a family member and very close to my wife, and, 2) Mr. Joel Spitzer, who is very close to my wife's father and is involved in this matter for the Defendants. These people (and others) constantly accost me on the street and attempt to berate and intimidate me into dropping this action by trying to make me feel guilty for breaking apart my family, and trying to convince me that it is my duty to please my wife at any price.

I feel that it is necessary to bring these matters to the Court's attention so that Your Honor can better appreciate the need to allow my claims to move forward and into Discovery. I appreciate Your Honor's time and consideration of these issues.

Respectfully Submitted,

Dated February 11, 2013, Monroe, NY.

Jacob Teitelbaum, Plaintiff ProSe

Exhibit

I

From: Jacob Teitelbaum
c/o Ben Friedman
5 Leipnik Way # 102,
Monroe N. Y. 10950

To: The Honorable Loretta A. Preska
United States District Court Chief Judge
Southern District of New York
500 Pearl Street
New York, New York, 10007

Re: Jacob Teitelbaum Vs. Juda Katz et al. 12-cv-2858 VB

Dear Judge Preska,

I am Jacob Teitelbaum, Plaintiff in this action.

Plaintiff seeking federal court protection

History of events causing plaintiff to file in Federal Court

Plaintiff is involved in a religious campaign and has become the target of terror and intimidation.

- Plaintiff is a resident in a Hasidic, ultra-Orthodox, closely-knit community. Plaintiff got involved in a religious campaign against forced divorces that have been taking place through the use of kidnapping within the community.
- Conspirators in the community have started intimidating and terrorizing Plaintiff to get him to step down and stop the campaign.
- While it is generally unheard of to go outside of this community for most matters, especially to report a member of the community to CPS for child abuse or neglect when both parents live together, there was an exception in this case when individuals in the community conspired with others to bring false allegations with and through Defendant CPS, this was done to further their terror campaign against the Plaintiff. Those individuals were not satisfied with taking the children away, but have continued to intimidate Plaintiff in many other ways. In addition, these individuals have harassed and intimidated Plaintiff's wife numerous times. In this manner, the community has attempted to drive her to prevent Plaintiff from participating in his religious campaign, and even going so far as to force her to have the Plaintiff removed from their home.

- The Plaintiff, after considering his financial limitations, his limited comprehension of and ability to speak English, his limited knowledge of law, and his lack of political connections, believed that ignoring the situation would be the best option.

- On about August 2011, after Plaintiff's wife resumed living in peace with Plaintiff, discontinuing any and all efforts to stop Plaintiff from his religious campaign against forced divorces. The conspirators, as a result of this, started again to terrorize Plaintiff's Wife, including through Defendant Orange County.

- After Plaintiff alerted the Family Court, stating that it was becoming obvious that Defendant DSS had conspired to terrorize Plaintiff as part of the conspiracy against the religious campaign, other than wanting the well-being of the children.

- As a result of Plaintiff alerting and reaching out, the conspirators and Defendants stopped targeting Plaintiffs wife; they instead resumed and intensified their efforts to convince her to join them in their efforts against the Plaintiff by offering to work with her (against husband) if she would agree to separate from the Plaintiff and intimidate him. This has left the Plaintiff with no other option than to seek remedy and protection in this Court, to stop the continued and conspiratorial terror and intimidation.

Claims and composition of complaint filed in April 2012

- The Complaint was brought to stop the conspiracy of terrorizing, intimidating Plaintiff, taking away Plaintiff's liberty, rights, and freedom of religion, through 1983 and 1985, claims of various deprivations of Fundamental Constitutional Rights, such as the Plaintiff's right to raise his children in a manner that he sees fit.

- This action is not about overturning a Family Court case or any other case pending or adjudicated in any other court. And it was not about getting custody back, or any of the like, it was used to bring to light the conspiracy and terror of the Defendants and the scope of the unconstitutionally deprivation of Rights committed by the Defendants against this Plaintiff as well as many others in the community

Events transpiring since filing of complaint until after last decision

- Plaintiff filed this Complaint April 11th 2012, since then Plaintiff has continually been threatened, intimidated, and harassed by the Defendants and conspirators, in a multitude of ways, in an attempt to force him to withdraw his Complaint.

- On May 11th 2012, the Hon. Judge Briccetti dismissed Plaintiff's claims against Judge Bivona and the Orange County Family Court on immunity grounds, while accepting the rest of the claims and Defendants.

- On June 6th 2012, Plaintiff became the victim of false criminal charges filed in the local Justice court by Plaintiff's wife who brought these charges on the behest of the conspirators in order to terrorize Plaintiff, and to cause him to withdraw his Complaint.

- Plaintiff wrote to this Court on June 19th 2012, about the ongoing terror and false charges, and on June 25th 2012 Plaintiff wrote to this Court again in a letter to further clarify the situation the conspirators have created.

- This Court then ordered Plaintiff and Orange County Attorney to appear for a conference regarding these on July 2nd 2012, while in courtroom at the hearing on that day, Plaintiff's friend Ben Friedman handed to the Court a letter regarding this matter, which the Court docketed.

- At the same time while in Court, the Orange County Attorney stated he will file a Motion to Dismiss, and this Court then informed the parties that it was inclined to proceed to discovery anyhow.

- On July 19th 2012, Defendant Children's Rights Society and Kim Pavlovic filed a Motion to Dismiss, while on July 20th 2012, Defendant Maria Petrizio filed a Motion to Dismiss.

- On July 30th 2012, Plaintiff asked the Court for an extension of time to answer the Motions to Dismiss, it was granted.

- On September 9th 2012. Plaintiff asked the Court to extend the time to answer the Motions again, due to the religious holidays constraints and timing, it was granted.

- On September 21st 2012, Defendant Kiryas Joel Community Ambulance CRP filed their Motion to Dismiss.

- On September 24th 2012, Orange County Attorney requested the Court to allow the County more time to file its answer to the Amended Complaint, until October 8, 2012, the application was granted.

- On September 24th 2012, Plaintiff asked the Court to grant more time to file opposition papers for Defendant Kiryas Joel Comm. Ambulance Motion to Dismiss, it was granted.

- On September 28th 2012, Defendants Juda and Chaya Katz, Joel and Bluma Tennenbaum requested from the Court to allow them to join the Motion to Dismiss by Defendants Children's Rights Society and Kim Pavlovic, it was granted.

- On August 9th 2012, the County Attorney filed their Motions to Dismiss.

- On August 11th 2012, Plaintiff asked the Court to dismiss all the above pending Motions, and order all Defendant's to answer the Amended Complaint by November 15th, 2012, as discovery was necessary for the Plaintiff to be able to properly answer the Defendants Motions, application was denied.

- Plaintiff was then ordered to file and serve opposition papers to all of the pending Motion to Dismiss by November 5, 2012. With the Defendant's replies due by November 30, 2012.

- On November 5th 2012, Plaintiff filed his answer to all pending Motion to Dismiss.

- On December 18th 2012, Defendant David Rubenstein filed a Motion to Dismiss, (untimely, while claiming he was not served the Amended Complaint yet by the Marshalls).

- Plaintiff then asked the Court on December 23rd 2012, to dismiss Defendant Rubenstein's Motion to Dismiss, for untimely filing his Motion, many months after his answer was due and sometime after Plaintiff had already answered all the other motions to dismiss, while Plaintiff had proof the Marshall's did serve him by mail with the Amended Complaint, (Defendant had accepted service of the original Complaint, and service by mail was now sufficient), and Plaintiff had already answered Motions to Dismiss by the other Defendants resembling the same or similar arguments.

- The Court denied Plaintiff's application, directing Plaintiff to submit his opposition to all of the arguments raised in Rubenstein's Motion to Dismiss by January 31st 2013, and Defendant Rubinstein's to reply, by February 14th 2013.

- On December 24th 2012, Plaintiff wrote again to this Court, describing the escalation of terror within the community and also through the Family Court, including by pressuring and involving again Plaintiff's wife to terrorize Plaintiff, Plaintiff asked the court to proceed to discovery immediately.

- On January 8th 2013, Plaintiff wrote again to the Court informing that the conspirators were blocking Plaintiff from communicating and access to those who help him with this Federal action, in a bid to stop this action from proceeding.

- On January 23th 2013, Plaintiff filed his detailed opposition to Defendant Rubenstein's Motion to Dismiss, as previously directed by this court.

- On January 27th 2013, Plaintiff again wrote to the Court informing how the conspirators have now managed to terrorize Plaintiff through eviction from his home with threats to withdraw this action, as they had threatened to do in the past.

- On January 29th 2013 Plaintiff wrote to the Court again, about the scope of this conspiracy and plot to force Plaintiff to withdraw this action.

- On February 11th 2013, Plaintiff again wrote to the Court further detailing how the conspirators want to keep Plaintiff chained and hooked under intimidation and terror for prolonged periods, to get him to step down from this Federal action and from his religious campaign.

- On February 11th 2013, early in the day and during Plaintiff's morning prayers while in the synagogue, a acquaintance of the Defendants family approached Plaintiff in a very hasty manner, and in a threatening tone offered to Plaintiff through intimidation and threats, a last chance to withdraw this Federal action and religious campaign and get back his wife and children (if this action is withdrawn), he then proceeded to inform Plaintiff that unless Plaintiff agrees immediately to this and to withdraw this action, the Judge will dismiss this action as soon as today or tomorrow, he claimed that he had inside information from a very reliable source associated to the Defendants and conspirators, all this while purporting to help Plaintiff.

- On February 12th 2013, Plaintiff received through the mail a Memorandum and Decision from this Court signed on 11th February, and entered two days later on the docket, granting all of the Defendants Motions to Dismiss, as more detailed below.

SUMMARY OF THE DECISION

- On page two (2), in a footnote the Decision states; "According to the docket. Chaya and Judah Katz have not been served with the amended complaint"! this a clear and stark contradiction to the actual record on docket numbers 86 and 88, the Decision then further states as a result; "they are not parties to any of the pending motions to dismiss", (the Defendant's themselves have asked to be part of the Motion's, see above).

- Pages two to eight (2-8) under the heading **"Background"**, while it quotes from Plaintiff's Complaint, it basically only quotes the pieces attempting to draw a picture as if Plaintiff is appealing the Family Court Decision!

- This is in stark contrast to Hon. Judge Briccetti's previous two orders/decisions, from May 11th 2012, and June 19th 2012, where the Court summarized Plaintiff's Complaint in a few short lines, stating; "Plaintiff, proceeding pro Se, brings this civil rights action asserting that defendants have conspired to remove his children in retaliation for his participation in a religious campaign".

- Clearly the Court had read the Complaint and claims as not to overturn the Family Court rulings, but asserting a conspiracy to terrorize and take away Plaintiff's liberty for religious activity.

- While on page eight (8) under the heading **"Decision"** it sets forth the Legal Standard for Motion to Dismiss.

- On page nine (9), the Decision states "Plaintiff's claims against DSS and CPS are dismissed because DSS and CPS are not sueable entities", Plaintiff indeed did not dispute this argument of County's Motion to Dismiss.

- The decision reads further, "if the Court were to construe Plaintiff's amended complaint liberally to assert a claim against Orange County, ... That claim would be dismissed under the Rooker-Feldman doctrine, as discussed below".

- Page then (10) where it discussed the Rooker-Feldman argument, where it starts with a summary of Plaintiff's claims against the County's Defendants, it reads; "Plaintiff's claims against Brunet, Bazile, CRS, Pavlovic, and Patrizio relate only to the alleged violation of plaintiff's constitutional right "to raise his children in a manner that he deems proper" and to have "custody and reasonable and unfettered access to his children", while this was a mere non conclusory statement of Plaintiff to simply illustrate the affect of the Defendants actions, the decision did not mention a word about Plaintiff's main and central claim of conspiracy by the Defendants against Plaintiff to terrorize and limit his freedom, as this Court has indeed realized and written on two prior occasions; May 11th 2012, and June 19th 2012, hence the court then concluded that; "The Court lacks subject matter jurisdiction with respect to those claims under the Rooker-Feldman doctrine!

- The remainder of that page thereafter is basically quoting the Defendants Motions to Dismiss and their arguments, without even mentioning the tiniest trace of any of Plaintiff's opposition and responses to those claims.

- The rest of Decision is about claims against Kiryas Joel EMS and Rubenstein, which is irrelevant for the Decision.

OBSERVATION

- It does not take a professor, expert, or rocket scientist to realize this Memorandum and Decision was not written by the same person as the other prior Decisions!

- Hon. Judge Briccetti's style of writing as seemingly clear from other and the prior writings in this case is; to cut through the nonsense and go straight to the point, the opposite of this Decision, showing no real substance.

- Hon. Judge Briccetti previously wrote in this case expressing his view of what the Complaint and claims were about, after having reviewed this case as early as May 11th 2012, where he is dismissing some of the Defendants and leaving the rest, he clearly did

not consider this case an appeal to overturn the Family Court Decisions and rulings, or an appeal for custody, which would of course have put this case automatically and directly under the Rooker-Feldman doctrine scrutiny, a common law, with which any layperson is also familiar with, and it would have been obvious from the get go, to be dismissed, if that was the case.

- Hon. Judge Briccetti clearly wrote in his prior two Orders, of May 11th 2012, and June 19th 2012, that this is a case of conspiracy and deprivation of rights, and not an appeal to Family Court Decision.

- Hon. Judge Briccetti moved right after Plaintiff's first letter dated June 25th 2012, which informed the Court about the intimidation and terror, and then ordered a conference, it is against common sense that suddenly only when the Court was now informed by the Plaintiff's letter dated January 27th 2013, that Defendants actually fulfilled some of their prior threats and evicted Plaintiff from his home with false criminal charges pending, that the Court should turn its back on Plaintiff, to join in with the conspirators, and leave Plaintiff without any protection.

- Hon. Judge Briccetti was patient and had all the time for all the parties since the filing of this Complaint 10 months ago, to just now issue a Decision in a hurry a mere three (3) days before Defendant Rubenstein's reply was due, did the Hon. Judge Briccetti suddenly lost patience and rendered a Decision? Rather this resembles the tactic typical to the community of Kiryas Joel to humiliate people such as the Plaintiff by illustrating there is no need even to hear what Defendant has to say in order to dismiss Plaintiff's claims!

- Hon. Judge Briccetti, since the beginning of this case, gave Plaintiff the opportunity to fix errors, where this Decision not only does it not give a chance to fix errors, it does not even explain a single word where, how and why Plaintiff is wrong! This clearly does not reflect the continued action and nature of the Hon. Judge Briccetti.

- The Hon. Judge Briccetti had directed Plaintiff to answer all Defendants Motions to Dismiss, while the Decision does not even mention a single word of Plaintiff's answers as per the Court's direction!

- The Hon, Judge Briccetti at the July 2nd 2012 conference in Court stated it will proceed to discovery, in response to Defendants County Attorney and counsel from Children's Right's Society saying they intend to bring a Motion to Dismiss and their grounds for it.

- Even if one was to assume that the Hon, Court changed its mind, the Hon. Court would surely not have delivered it in such a misinformed and rushed manner, ignoring all of Plaintiff's arguments.

- The Hon. Judge Briccetti was continually on top of this case, he would not have forgotten a blatant and open document on the record, to write; "According to the docket, Chaya and

Judah Katz have not been served with the amended complaint", especially when the same Court had previously granted the very same Defendants to join in on the Motion to Dismiss by Defendants Children's Rights Society and Kim Pavlovic for the Amended Complaint, it would not have omitted in its Decision two other Defendants, not mentioned elsewhere in this Decision; Defendants Joel and Bluma Tennenbaum.

CONCLUSION

- Since it is well-known that Kiryas Joel political machine is one of the strongest or the strongest political power in the region, they reach out to acting Judges in cases where they are involved, and based on all above, it is very certain that Defendant Kiryas Joel influenced someone, possibly a clerk, in the Cambers of the Honorable Judge Briccetti in order to elicit this Decision.
- The clear and obvious fact that the Defendant was the one to write this Decision rather than the Court, puts the Plaintiffs life in a very dangerous situation.

PRAYER FOR RELIEF

Plaintiff accordingly respectfully requests this Hon. Court, that a thorough investigation and enquiry on this matter be done and insure that Plaintiff's liberty is not jeopardized so that justice be served.

Dated at Monroe, in the County of Orange and State of New York this 20th day of February 2013

Jacob Teitelbaum, Plaintiff ProSe
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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

JACOB TEITELBAUM, individually and as father to CHILD A and CHILD B, **PLAINTIFF** **-against-** JUDA KATZ; CHAYA KATZ; et al. **DEFENDANTS**	**CIVIL ACTION NO. 12 CV 02858 (VB)** **AFFIRMATION OF SERVICE**

I, BENZION P. FRIEDMAN, declare under penalty of perjury that I have served a copy of the attached **NOTICE OF MOTION TO APPOINT A NEXT FRIEND, MOTION TO APPOINT A NEXT FRIEND, AFFIDAVIT IN SUPPORT OF MOTION TO APPOINT A NEXT FRIEND**
upon

The Honorable Loretta A. Preska
United States District Court Chief Judge
Southern District of New York
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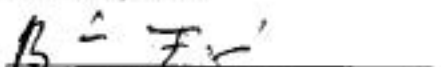

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