

PRO SE OFFICE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DATE FILED: 4/29/13

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

PLAINTIFF

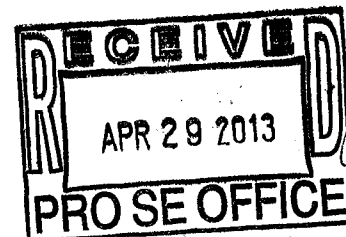
**CIVIL ACTION NO.
12 CV 02858 (VB)**

-against-

**MOTION FOR LEAVE
TO AMEND AND
SUPPLEMENT**

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



PLAINTIFF JACOB TEITELBAUM, appearing Pro Se, does, herewith, ask this
Honorable Court to for leave to Amend the previously submitted Complaint, pursuant to FRCP
Rule 15 (b)(2) and Rule 15 (d), and for an Order granting leave to Amend and Supplement the
Complaint with new facts that are pertinent to this matter, regarding incidents that have
transpired since the filing of the last Amended Complaint. Plaintiff further requests leave to
amend the Complaint to

reflect the §1983 and §1985 Conspiracy claims by showing a meeting of the minds and by showing a clear pattern of intent to harm the Plaintiff and to interfere with his freedom and Civil Rights, said amendment would be better reflected in light of the new facts.

Plaintiff seeks to amend the Complaint as to all Defendants in order to demonstrate that his Claims are independent of the Family Court action and independent of any prior rulings or actions by or in any court. Such Amending will show clearly how the Defendants, acting in concert and separately, have, by a meeting of the minds, conspired to harm Plaintiff.

Plaintiff further requests to be able to amend the claims pursuant to the applicable laws granting this Court Jurisdiction, Plaintiff asserts that allowing him to supplement the Complaint with the facts and allowing the Plaintiff to further amend the Complaint to cure any defects in light of this Court's ruling on Feb 11th 2013 is fully consistent with the text and intent of Rule 15 (b)2." Plaintiff argues that he should be given a chance to amend defects in his Pleadings pursuant to *Haines v. Kerner*, 404 U.S. 519 (1972) and *Mian v. Donaldson, Lufkin & Jenrette Sec. Corp.*, 7 F.3d 1085 (2nd Cir. 1993)

The Plaintiff now asks this Court to reconsider its Decision dismissing the claims against certain Defendants and to allow the Plaintiff time, as needed and if necessary, to amend his Complaint to comport with this Court's and the law's requirements.

Respectfully Submitted,



Jacob Teitelbaum, Plaintiff Pro Se
c/o Ben Friedman
5 Leipnik Way, #102
Monroe, N.Y. 10950
845-782-7830

Dated; Monroe, New York
April 25, 2013

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 FOR LEAVE TO AMEND AND SUPPLEMENT**, and **MOTION FOR LEAVE TO AMEND AND SUPPLEMENT**, upon

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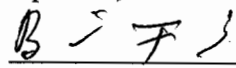
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by mail

Dated; Monroe, New York
April 29, 2013



Benzion P. Friedman
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Monroe, N.Y. 10950
845-782-7830

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 COMMUNITY AMBULANCE
CORPORATION; ATTY. MARIA A. PATRIZIO;
CHILDREN'S RIGHTS SOCIETY, INC;
ATTY. KIM PAVLOVIC; ATTY JOHN FRANCIS X.
BURKE; COUNTY OF ORANGE ; CHRISTINE BRUNET;
ATTY. STEPHANIE BAZILE; DAVID HOLLANDER;
MIRIAM TEITELBAUM; JOHN DOES 1 THROUGH 95;
JANE DOES 1 THROUGH 20,

DEFENDANTS

**CIVIL ACTION NO.
12-CV-2858 (VB)**

**SECOND
AMENDED
COMPLAINT**

**JURY TRIAL
DEMANDED**

Plaintiff JACOB TEITELBAUM, appearing Pro Se, by way of complaint against the
Defendants respectfully alleges as follows:

NATURE OF COMPLAINT

1. Plaintiff is a resident in a Hasidic, ultra-Orthodox, closely-knit community, In 2010 Plaintiff got involved in a religious campaign against forced divorces that have been taking place through the use of kidnapping within the community.
2. Certain people in the community disagreed with the religious campaign, this resulted in severe terror and intimidation when individuals in the community conspired with State actor Defendant Orange County and others outside this community against Plaintiff in a conspired collaboration acting in concert and separately in a conspiratorial manner to further this goal to intimidate, deprive and violate Plaintiff's Civil Rights in many different ways.
3. Where it is unheard of to report a community member to outside authorities for child abuse or neglect when both parents live together. This case was indeed a rare exception, and not one of child neglect.
4. Plaintiff was subjected to severe intimidation, harassment, terror, his freedom was jeopardized, his family broken up, his children taken away and terminated from him, pushing Plaintiff into a homeless situation and without normal living conditions, under constant fear, trauma and emotional turmoil by the continued and ongoing terror.
5. Furthermore, this harassment and intimidation was initially also targeted against Defendant Miriam Teitelbaum as well when she was still living in peace with Plaintiff. In this manner, the community achieved their goal to drive her to turn against Plaintiff, to prevent Plaintiff from participating in his religious campaign, to intimidate Plaintiff on their behalf, and to get Plaintiff to stop or withdraw this action.

6. This has left the Plaintiff with no other option than to seek remedy in this Court. This complaint sets forth a clear pattern of Plaintiff being targeted, intimidated, and terrorized, it sets forth a clear meeting of the minds between the conspirators, and all Defendants including Defendant Orange County a State actor, Plaintiff sets forth his claims through 1983 and 1985 actions, for claims of various deprivations of Fundamental Constitutional Rights.
7. Plaintiff has not brought this action to overturn any Family Court or other State Court adjudication or order, this case is not about regaining custody of his children, albeit their being removed under false charges and conspiracy among the Defendants to frame and terrorize Plaintiff, and upon information and belief Plaintiff's parental rights have been terminated long after the filing of this case, nonetheless this action was brought for the sole purpose to stop this ongoing conspiracy of terrorism and violation of Constitutional Rights. As this Court has indeed clearly understood that Plaintiff is not appealing Family Court but rather asking to restore Plaintiffs freedom and Civil Rights, and protect from further harm, this court has acted accordingly as seen from two prior orders on May 11th Docket # 8, and June 19th 2012 Docket # 10.

JURISDICTION AND VENUE

8. Plaintiff Jacob Teitelbaum, Child A, and Child B are residents of the Town of Monroe, County of Orange, State of New York.
9. Upon information and belief all of the above named Defendants are residents of or conduct business in the County of Orange, State of New York.

10. This action is brought pursuant, but not limited to, Federal Question, 28 U.S.C. § 1331 for violations of the constitutional amendments, and state and federal statues and pursuant the law.
11. This court also has jurisdiction over this matter pursuant but not limited to, 42 U.S.C. § 1983, and § 1985.
12. Venue is a Southern district of the United States District Court of New York, since the Events alleged herein happened in Orange County, New York, and Plaintiff as well as Defendants are residing or conducting business in Orange County, New York.

PARTIES IN THIS COMPLAINT

13. Plaintiff JACOB TEITELBAUM, is an individual over the age of 18 years, and is a citizen of the United States of America residing at 20 Getzel Berger Boulevard, Unit 104, Monroe, New York, 10950. Plaintiff is representing himself pro se, hereinafter referred to as "Plaintiff".
 - a. Plaintiff Child "A", represented by Plaintiff, is an individual, a minor child, and a resident of the state of New York, hereinafter referred to as "Child 'A'".
 - b. Plaintiff Child "B", represented by Plaintiff, is an individual, a minor child, and a resident of the state of New York, hereinafter referred to as "Child 'B'".
14. Defendant Juda Katz is a New York state resident located at 22 Hayes Court, Unit 201, Kiryas Joel, New York. Defendant Juda Katz is the brother in law to Defendant Miriam Teitelbaum and was once a foster parent to "Child 'A'".

15. Defendant Chaya Katz is a New York State resident located at 22 Hayes Court, Unit 201, Kiryas Joel, New York. Defendant Chaya Katz is sister to Defendant Miriam Teitelbaum and was once a foster parent to "Child 'A'".
16. Defendant Joel Tennenbaum is a New York state resident located at 16 Lizensk Boulevard, Unit 102, Kiryas Joel, New York. Defendant Joel Tennenbaum is brother to Defendant Miriam Teitelbaum and foster parent to Plaintiff's children.
17. Defendant Bluma Tennenbaum is a New York state resident located at 16 Lizensk Boulevard, Unit 102, Kiryas Joel, New York. She is the wife of Joel Tennenbaum, sister-in-law to Defendant Miriam Teitelbaum, and foster parent to Plaintiff's children.
18. Defendant David Rubenstein is a New York state resident located at 4 Lamberg Ct., Unit 301, Kiryas Joel, New York. Defendant is a key member of Hatzalah, a volunteer Emergency Medical Service (EMS).
19. Defendant Kiryas Joel Comm Ambulance Corp. of Kiryas Joel, New York, upon information and belief is a New York state non-profit organization that operates at times interstate. Its primary location is 51 Forest Road, Village of Kiryas Joel, New York. Hereinafter, defendant will be referred to as "Hatzalah EMS".
20. Defendant Attorney Maria A. Patrizio acted as attorney for Defendant Miriam Teitelbaum in the Family Court Proceedings. Defendant attorney Patrizio may be served a summons at her primary office, which is located at 2 Court lane, P.O. Box 328, Goshen, New York, 10924. Hereinafter, this Defendant will be referred to as "Attorney Patrizio".
21. Defendant Children's Rights Society Inc., has its primary place of business located at 213 West Main St., P.O. Box 1002, Goshen, New York, 10924. This Defendant acted through its agent Attorney Kim Pavlovic as the law guardian for Plaintiff's children. The

Defendant may be served a summons at their primary place of business, 213 West Main St., Goshen, New York, 10924. Hereinafter, Defendant will be referred to as "Attorney Pavlovic".

22. Defendant Attorney John Francis X. Burke holds his primary office at 210 Main Street, P.O. Box 943, Goshen, New York, 10924. This Defendant acted as attorney for Plaintiff in the Family Court proceedings. Defendant Attorney Burke may be served a summons at the location listed above. Hereinafter, this Defendant will be referred to as "Attorney Burke".
23. Defendant County of Orange, New York is a New York government entity located at, 285 Main Street, Goshen, New York, 10924. This Defendant acted through its agent's attorney Stephanie Bazile and Social Caseworker John or Jane Does. Department of Social Services of Orange County, and Child Protective Services, The Defendant may be served a summons at the Orange County Law Department Family Law Division, which is located at 285 Main Street, Goshen, New York, 10924. Hereinafter, Defendant County of Orange, N.Y., will be referred to as "Orange County" or "DSS", and "CPS".
24. Defendant David Hollander is a New York state resident located at 1 Chernobyl Court Unit 102 Monroe, New York, 10950
25. Defendant Miriam Teitelbaum (Plaintiff's wife) is a New York State resident located at 20 Getzel Berger Boulevard, Unit 104 Monroe, New York, 10950.
26. Defendants John Doe 1 through 95 and Jane Doe 1 through 20 were at all times relevant herein as part of the conspiracy against Plaintiff as of about March 2010 until now.

Non Parties

27. Ben Friedman, a friend of Plaintiff, is a non-party who was witness to events described in the Statement of Facts, (a motion to be appointed as next friend or Guardian ad litem for the Plaintiff is currently pending in this court).
28. Meir Tennenbaum is the father of Defendant Miriam Teitelbaum.
29. Mrs. Tennenbaum is the mother of Defendant Miriam Teitelbaum.
30. Rabbi Dr. Price is the Plaintiff's psychiatrist.
31. Orange County Family Court.

STATEMENT OF FACTS

-----A

32. On or about March 2010, Plaintiff and his friend Mr. Ben Friedman got involved in a religious campaign against forced divorces that had been taking place through the use of illegal kidnapping in the community.
33. Upon information and belief, thereafter individuals in the community conspired to silence this campaign.

-----B

34. On or about April 14th, 2010, Defendant Chaya Katz arranged with Defendant Miriam Teitelbaum for the Defendant's children to visit Plaintiff's home in order to make an exchange of personal items. The exchange was to occur while the Defendant Miriam Teitelbaum was going to *Mikveh* (Ritual Bath).
35. Defendant Chaya Katz's children came to the house as previously arranged in order to exchange the items.

36. Not suspecting anything, Plaintiff allowed Defendant Katz's children into the house.
37. Meanwhile, Plaintiff stepped outside the house with child 'A'. Child 'B' was sleeping in his crib and thus remained in the house with Defendant Katz's children.
38. Defendant Katz's children then abducted child 'B' from his crib.
39. Plaintiff re-entered the house once Defendant Katz's children left and noticed that child 'B' was missing from his crib.
40. Plaintiff then realized that Defendant Katz's children had abducted child 'B'.
41. Plaintiff and his wife [once back from mikveh] tried reaching Defendants Juda and Chaya Katz by calling them on the phone, but were unsuccessful.
42. Plaintiff and his wife then went to Defendants Juda and Chaya Katz's home to get the child back, and knocked at their door for about an hour.
43. Defendant Hatzalah EMS then arrived at Defendants Katzs' home.
44. Defendants Juda and Chaya Katz returned the child 'B' to Plaintiff and his wife.

-----C

45. On or about April 27th, 2010, Defendant Miriam Teitelbaum gave baby Tylenol to Child 'B'.
46. Soon thereafter, Defendant Miriam Teitelbaum found Child 'A' playing with the open baby Tylenol bottle.
47. Defendant Miriam Teitelbaum then called Defendant Hatzalah EMS so that they might determine whether Child 'A' had ingested the Tylenol.
48. Defendant David Rubenstein from Hatzalah EMS arrived at the home.

49. Defendant David Rubenstein said he would take Child 'A' to the hospital for a checkup. Defendant Miriam Teitelbaum would accompany Defendant Rubenstein and Child 'A' to the hospital.
50. Defendant David Rubenstein asked Defendant Miriam Teitelbaum to sign a consent that would allow Defendant Rubenstein to keep Child 'B' at his apartment until the Defendant Miriam Teitelbaum returned from the hospital the next day with Child 'A'.
51. Defendant Miriam Teitelbaum signed the consent for Defendant David Rubenstein.
52. Once the consent was signed, Defendant Rubenstein had another EMS member take the Child 'B' to his apartment.
53. Defendant David Rubenstein then abducted Defendant Miriam Teitelbaum with an ambulance, taking her and committing her to a mental institution.
54. Defendant David Rubenstein then gave Child 'A' to Defendants Juda and Chaya Katz.
55. Defendant David Rubenstein did not inform Plaintiff of the abduction of Defendant Miriam Teitelbaum or of her placement in the hospital.
56. Neither Defendant David Rubenstein nor Defendants Juda or Chaya Katz informed Plaintiff or his wife of Child 'A's' whereabouts.
57. On about April 28th, 2010, Defendant CPS confronted Plaintiff at his home.
58. At that time, Defendant CPS officially informed Plaintiff that they had removed his children.
59. Defendant CPS served Plaintiff with charges in the evening.
60. Defendant CPS charged Plaintiff with Child Neglect.
61. Plaintiff was charged without proper investigation.
62. Plaintiff was charged without probable cause.

63. Defendant CPS removed the children without imminent danger.

-----D

64. On or about May 5th, 2010, Family Court assigned to Plaintiff Defendant attorney John F.X. Burke.

65. Thereafter, Plaintiff asked Defendant attorney Burke to both deny the charges and prove to the Family Court that the charges were false.

66. Defendant attorney Burke refused to fight for Plaintiff, claiming he had received a deal from DSS.

67. Defendant attorney Burke insisted that, because of his deal with DSS, Plaintiff must plead guilty to the charges.

68. Plaintiff was recently informed that Defendant Attorney Burke had entered consent to all the charges without a fact finding hearing.

69. On the other hand, Defendant Miriam Teitelbaum received an ACD for the same charges.

-----E

70. On or about August 2010, through several phone calls made to the Defendant Miriam Teitelbaum, people in the community incited and obliged Defendant Miriam Teitelbaum to stop Plaintiff from completing his religious campaign.

-----F

71. On or about September 7th, 2010, Defendant DSS Orange County returned the children to Plaintiff and his wife.

-----G

72. On or about September 15th, 2010, Plaintiff performed a peaceful demonstration in Kiryas Joel as part of his religious campaign.

-----H

73. On or about September 16th, 2010, Child 'B' did not wake from his usual daytime nap.

74. Defendant Miriam Teitelbaum called Defendant Hatzalah EMS.

75. Defendant Hatzalah EMS took Child 'B' to Westchester Medical Center.

76. Thereafter, Defendant DSS removed the children from the Plaintiff's home once again.

77. According to a Court Order dated February 8th, 2012, a petition alleging a violation of the terms and conditions of the Order of Disposition [which had ordered that Plaintiff was to secure his medication out of the children's reach] was filed on October 25th, 2010.

78. Defendant Attorney Burke claims [in Feb 2012] that he does not have a copy of the petition.

a. According to the Court transcript dated Jan 12th, 2011, the matter was scheduled for trial on Jan 12th, 2011.

b. According to the Court transcript dated Jan 12th, 2011, petition was not read in Family Court.

79. According to the Court transcript dated Jan 26th, 2011, Defendant DSS stated they had not yet received the hospital records or the records from Defendant Hatzalah EMS regarding the September 16th, 2010, incident with child 'B' [the subpoena was served on January 21st, 2011].

80. Defendant Attorney Burke told Plaintiff that in order to get his children back he would need to admit that he failed to secure his medication. However, Plaintiff had never taken the medication. The medication bottle was unopened and contained within an unopened bag.

81. Meanwhile, Family Court adjourned Defendant Miriam Teitelbaum's trial to a later date of March 10th.

82. Family Court stated that this situation was an accident and that Defendant Miriam Teitelbaum could not be blamed for an accident.

-----I

83. On or about September 26th, 2010, Meir Tennenbaum, Defendant Miriam Teitelbaum's father, visited Plaintiff's house.

84. Meir Tennenbaum then verbally harassed and embarrassed Mr. Ben Friedman, who was present at the Plaintiff's house, for being involved in the religious campaign.

85. Meir Tennenbaum then harassed Plaintiff for having a friendly relationship with Mr. Ben Friedman.

86. Meir Tennenbaum then ordered Defendant Miriam Teitelbaum to not allow Mr. Ben Friedman into her house anymore.

87. Since this time, Defendant Miriam Teitelbaum has resisted each time Plaintiff has wanted Mr. Ben Friedman to visit their house.

88. Also since this time, Defendant Miriam Teitelbaum has blocked all calls from anyone who is associated with the religious campaign, effectively preventing Plaintiff from receiving calls from those involved with the campaign.

-----J

89. On or about October 2010, Defendant DSS agreed to allow the *Payos opsheren* celebration of Child 'A' to take place at Plaintiff's home on October 11th.
90. On or about October 9th, Defendant DSS informed Plaintiff that they were not sure about allowing the celebration to take place at Plaintiff's home.
91. On or about October 10th, Defendant DSS informed Plaintiff that the celebration would only be allowed to take place at the home of Meir Tennenbaum.
92. Defendant DSS gave no reason for the sudden change in required location.

-----K

93. On or about July 2011, Defendant DSS informed Plaintiff that the court had ordered Plaintiff to leave his house every Friday for 1-½ hours, during the time that his wife would have visitation with the children. (Exhibit 'A')

-----L

94. On or about July 2011, Plaintiff's psychiatrist, Rabbi Dr. Price, informed Plaintiff and his wife that he saw no real necessity for Plaintiff taking the psychotropic medication that had been prescribed to Plaintiff at an earlier time under the direction of the Plaintiff's family.
95. Dr. Price also informed Plaintiff that as long as he insisted on continuing the religious campaign, Plaintiff would not get his children back.

96. Defendant Miriam Teitelbaum disagreed with Dr. Price, insisting that Dr. Price tell Plaintiff that he must take medication.
97. Defendant Miriam Teitelbaum's request was an effort to stop Plaintiff from his religious campaign through the use of medication. This tactic is a common one used in the Hasidic ultra-Orthodox community in order to gain control over someone, and was in fact the tactic that had resulted in the prescribing of the psychotropic medication to Plaintiff in the first place.

-----M

98. On or about July 18th, 2011, Defendant David Rubenstein, in conjunction with other Hatzalah EMS members, organized the abduction of the Plaintiff, forcing him into a mental institution (Bellevue Hospital Center).
99. On or about July 19th, 2011, Plaintiff was signed out of the hospital and returned to Kiryas Joel through the assistance of his friend Mr. Ben Friedman.
100. Bellevue Hospital released Plaintiff only on the condition that Plaintiff would not return to his own home.
101. Once Plaintiff returned to Kiryas Joel, Defendant Rubenstein and other Hatzalah members chased Plaintiff in the street, attempting to abduct him again.
102. Plaintiff then took cover by fleeing in a friend's car to his friend Ben Friedman's house.
103. Defendant Rubenstein and other Hatzalah EMS members continued to chase Plaintiff to said house.
104. Defendant Rubenstein attempted to open the door of the house without asking permission to enter.

105. When he was denied entry, Defendant Rubenstein intruded through the window, threatening that he would kidnap both Plaintiff's friend and Plaintiff if Ben Friedman would not open the door for Defendant Hatzalah EMS immediately.
106. Plaintiff's friend immediately called the N.Y. State Police.
107. N.Y. State Police arrived and did not allow Defendant Rubenstein or other Hatzalah EMS members to abduct or institutionalize Plaintiff.
108. Defendant Rubenstein and the other Hatzalah EMS members then left the scene.
109. Plaintiff then went to Arden Hill Hospital to be evaluated in order to prove that the allegations Defendant Hatzalah EMS were making against Plaintiff were false.
110. On or about July 19th, 2011, Arden Hill Hospital confirmed that there was no reason to institutionalize Plaintiff.
111. Arden Hill Hospital released Plaintiff on the condition that Plaintiff would not return to his own home.
112. Plaintiff then returned to his home.
113. Defendant Miriam Teitelbaum then called Defendant Hatzalah EMS, asking them to remove Plaintiff from the home and to return him to a mental institution.
114. Defendant Hatzalah EMS did not respond to her request.
115. Defendant Miriam Teitelbaum then called the N.Y. State Police, asking them to remove Plaintiff from the home.
116. N.Y. State Police informed Defendant Miriam Teitelbaum that they could not remove Plaintiff, and advised her that she could only have him removed through the family court system.

-----N

117. On or about July 2011, individuals in the community contacted Defendant Miriam Teitelbaum again via telephone, attempting to incite her to separate from Plaintiff by moving out of the home into another apartment of her own. However, Defendant Miriam Teitelbaum refused.
118. Acting under the instructions of certain individuals within the community, Defendant Miriam Teitelbaum seized Plaintiff's Shabbas clothing.
119. Plaintiff firmly demanded that his wife return the clothing.
120. On or about August 2011, Defendant Miriam Teitelbaum demanded that those individuals in the community who possessed Plaintiff's clothes must return the clothing to her. Once she received the clothing, she then gave the clothing back to her husband and resumed living in peace with Plaintiff.

-----O

121. On or about August 2011, through more telephone calls to Defendant Miriam Teitelbaum, individuals in the community threatened to abduct Defendant Miriam Teitelbaum and to force her into a mental institution because she had resumed living in peace with Plaintiff rather than attempting to deter Plaintiff from his religious campaign.
122. On or about September 8th, 2011, this threat was carried out. Defendant Hatzalah EMS abducted Defendant Miriam Teitelbaum from the street outside her home and forced her into a mental hospital (N.Y. Presbyterian, Westchester County).
123. Defendant Hatzalah EMS did not inform Plaintiff of abduction.

124. Defendant Hatzalah EMS [or the family] instructed the admitting hospital to not listen to Plaintiff or his agents whatsoever.
125. Defendant Miriam Teitelbaum was thus institutionalized for about two and a half weeks, lasting until late September 2011.
126. On or about September 12th, 2011, Defendant Miriam Teitelbaum called her mother Mrs. Tennenbaum to ask her why her mother had participated in said abduction.
127. Defendant Miriam Teitelbaum 's father, Rabbi Meir Tennenbaum, interrupted the phone conversation, hysterically proclaiming that the Defendant Miriam Teitelbaum "...deserved it, because six weeks ago you told me that your husband is the problem, and now you are in peace with him and Mr. Friedman. I'm not afraid of your husband or Mr. Friedman."

-----P

128. On or about October 6th, 2011, after Defendant Miriam Teitelbaum had been released from the mental institution, Defendant Miriam Teitelbaum's parents - Meir and Mrs. Tennenbaum - had another heated discussion with Defendant Miriam Teitelbaum. During the conversation, they expressed their anger about her living in peace with Plaintiff as well as the fact that she was no longer trying to deter Plaintiff from his religious campaign.
129. Defendant Miriam Teitelbaum's parents then sent Defendant Hatzalah EMS to Plaintiff's home with the goal of once again abducting Defendant Miriam Teitelbaum and forcing her into a mental institution.
130. Defendant Miriam Teitelbaum then called the N.Y. state police.

131. Defendant Hatzalah EMS took Defendant Miriam Teitelbaum to Orange County Horton Medical Center, who released her the very same day once the Plaintiff contacted them to say that his wife was fine.

-----Q

132. On or about October 21st, 2011, Defendant DSS did not allow Plaintiff's children to visit Plaintiff in the men's section of the synagogue for *Simchas Torah* dancing with their father as all children do.

133. Defendant DSS then fought with Defendant Miriam Teitelbaum for having allowed the children to go into the men's section with Plaintiff for a mere few minutes.

134. Since that incident, Defendant DSS has prevented visitations from occurring at the Plaintiff's home; rather, visitations must occur at the office of DSS.

-----R

135. On or about November 4th, 2011, Defendant DSS shortened the length of Defendant Miriam Teitelbaum's scheduled visitation with her children without warning or explanation. When Defendant Miriam Teitelbaum inquired as to why the visitation was shortened and rightfully requested that she be granted the full agreed scheduled time, she was forcefully committed into Orange Regional Medical Center. Defendant DSS justification for this action was that the Defendant Miriam Teitelbaum was "irritated."

136. In this case, Defendant DSS had hospitalized Defendant Miriam Teitelbaum on the eve of a weekend when no resident psychiatrist was there, requiring the hospital to keep her at

the hospital until a doctor would be able to discharge her on Monday after verifying that there was no reason that she must stay there.

-----S

137. On or about Dec 27th, 2011, Plaintiff filed a motion with Family Court to stop Defendant DSS politically motivated actions.
138. Plaintiff asked Family Court to make a determination through a fact finding hearing that the underlying involvement of the Defendant DSS in this matter was based on political reasons.
139. Plaintiff stated, that Defendant DSS, Defendant Hatzalah EMS, and others in the community were now targeting Defendant Miriam Teitelbaum, in an effort to stop Plaintiff from his religious campaign. By saying this, Plaintiff alleged that this clearly demonstrated that Defendant DSS's actions were politically motivated.
140. On or about January 3rd, 2012, Defendant attorney Maria Patrizio called Defendant Miriam Teitelbaum and stated that Plaintiff would never get custody of the children because:
 - a. Plaintiff had filed a motion;
 - b. Plaintiff had a friendly relationship with Mr. Ben Friedman; and
 - c. Plaintiff had not cooperated with Defendant Attorney Burke.
141. Defendant Attorney Patrizio also stated that should the subject of the Plaintiff's motion be raised in court the next day, then Plaintiff would have to say in court that he did not file this motion.

142. Defendant Attorney Patrizio also stated that Defendant Miriam Teitelbaum must choose between either separating from Plaintiff or giving up the right to her children forever.

-----T

143. On or about January 4th, 2012, Defendant DSS dropped the motion against Defendant Miriam Teitelbaum.

144. Plaintiff had attempted to obtain a transcript of the record of the court appearance for January 4th 2012.

145. Plaintiff was informed by Family Court that there was no record for any appearances on that day.

-----U

146. On or about January 4th, 2012, while in the Court building, Defendant attorney Patrizio suggested to Defendant Miriam Teitelbaum that she ignore and abandon Plaintiff because he had filed the above mentioned motion.

147. Defendant Attorney Patrizio then demanded to know what Defendant Miriam Teitelbaum had chosen of the two options she had been given during the previous day's conversation: whether Defendant Miriam Teitelbaum would separate from Plaintiff or give up her right to her own children.

-----V

148. On or about January 9th, 2012, Defendant Attorney Kim Pavlovic proposed in Court that the children be returned to Defendant Miriam Teitelbaum on the condition that Plaintiff would be evicted from the home.
149. Defendant Attorney Pavlovic stated that the major issue that would prevent the return of the children was the Plaintiff and that the Defendant Miriam Teitelbaum had been complying all along. Defendant Attorney Pavlovic also stated that only by evicting the Plaintiff could the situation be helped
150. Defendant Attorney Burke did not object.
151. Defendant DSS did not object to Defendant Attorney Pavlovic's proposal to return the children to Defendant Miriam Teitelbaum on the condition that Plaintiff was evicted from his home.
152. Family Court agreed and affirmed all of this.
153. As seen on the transcript, Family Court stated the following to the Plaintiff: "You must realize that apparently the difficulty lies with you, unless you are more amenable to the recommendations of the Department of Social Services. You know, there's an old saying. If you go along, you get along. Sometimes it's easier to comply with the requests of the Department of Social Services than it is to buck up against them. Do you understand what I mean?"
154. As seen on the transcript, Family Court then stated to Defendant DSS: "In the meantime I expect something to be done." In this case, Family Court was hinting that DSS should be keeping pressure on the Plaintiff.

-----W

155. After the Court session, Defendant Attorneys Patrizio and Burke demanded that Plaintiff leave his home immediately and for good.
156. Defendant Attorney Patrizio stated again to Defendant Miriam Teitelbaum that she would lose the children forever if she would not comply with their request to evict Plaintiff from the home.
157. On or about January 20th, 2012, Defendant Attorney Patrizio called Defendant Miriam Teitelbaum to insist that she file a motion that would evict Plaintiff from the home for several months. Defendant Attorney Patrizio said that this action would result in Defendant Miriam Teitelbaum getting the children back, and also stated again that Defendant Miriam Teitelbaum would lose her children forever if she did not file it. Defendant Attorney Patrizio very strongly pressured Defendant Miriam Teitelbaum to file this motion.
158. Thereafter, Plaintiff sent a letter to Family Court informing the Court of the intimidation his wife was experiencing. The letter also asked why this was happening.
159. On or about January 26th, 2012, Defendant Attorney Patrizio called Defendant Miriam Teitelbaum and asked what she had decided to do about evicting Plaintiff. In response, Defendant Miriam Teitelbaum said that she needed Plaintiff, especially if the kids were at home, and that it would be detrimental to her and to the well being of the children if the Plaintiff was not at home.
160. Defendant Attorney Patrizio continued to insist that Defendant Miriam Teitelbaum file a request to evict Plaintiff because the Family Court had already made up its mind not to return the children to Plaintiff. Defendant Attorney Patrizio also stated that the Court would not change its mind.

161. Thereafter, Defendant Attorney Maria Patrizio sent a letter to Defendant Miriam Teitelbaum dated February 9th, 2012, reiterating her previous warning that Defendant Miriam Teitelbaum should separate from Plaintiff to facilitate having the children returned to her custody. The letter further stated that if Defendant Miriam Teitelbaum decided to remain with Plaintiff, her parental rights could be terminated: that she would no longer be the legal parent of her own children and that the children could potentially be adopted by another party. (Exhibit 'B')

-----X

162. Plaintiff's first motion filed on or about December 27th, 2011, was returnable for January 17th, 2012.
163. As of January 17th, 2012, none of the Defendants had replied to the motion.
164. There is no document reflecting any written request for an extension to reply to this motion.
165. There is no record of any verbal request for an extension to reply to this motion.
166. On or about February 3rd, 2012, Plaintiff received a reply to his motion from Defendant DSS dated January 19th, 2012.
167. Plaintiff immediately wrote to Family Court asking if he could still reply to Defendant DSS's reply, as their reply was dated after the deadline had passed.
168. Family Court did not answer Plaintiff's question.
169. On or about February 10th, 2012, Plaintiff received Family Court's decision dated February 8th, 2012.
170. Family Court denied Plaintiff's motion, reasoning that it was frivolous.

-----Y

171. On or about January 17th, 2012, Plaintiff filed a 2nd motion requesting written clarification from Defendant DSS as to whether or not they wanted him to stop his involvement in the religious campaign for the interest of his children. Plaintiff also asked that, should Defendant DSS have no issue with his religious campaign, Defendant DSS give Plaintiff a written notification identifying the charges against him and explaining what Plaintiff would need to do in order to be compliant with those charges. This request was made with the ultimate goal of getting the children back.
172. On or about February 3rd, 2012, Plaintiff received the Defendant DSS's opposition papers for Plaintiff's 2nd motion.
173. Defendant DSS did not mention what requirements would need to be met in order for Plaintiff to get his children back.
174. On or about February 7th, 2012, Plaintiff replied to Defendant DSS's opposition papers to Plaintiff's 2nd motion. Plaintiff again requested an explanation of what the charges against him were and how he could comply with them. He also asked, again, about whether Defendant DSS required him to stop his involvement in the religious campaign.
175. On or about February 10th, 2012, Plaintiff received Defendant Court's decision in response to Plaintiff's 2nd motion dated February 8th, 2012.
176. Family Court stated that it would be advancing this motion and would render its decision immediately, although it was returnable by February 23rd, 2012.
177. Family Court further stated that Defendant DSS acted only to protect the children.
178. Family Court denied Plaintiff's 2nd motion, reasoning that it was frivolous.

179. Family Court failed to explain why Defendant DSS would not provide Plaintiff with what they required of him to comply with in order to get back the children.

-----Z

180. On or about Dec 27th, 2011, Plaintiff wrote to Family Court, dismissing the Court-assigned Defendant Attorney Burke.

181. On or about January 3rd, 2012, Plaintiff wrote to Family Court requesting an interpreter.

182. Plaintiff informed the Family Court that his case was not being properly communicated to the Court through Defendant Attorney Burke, and requested that an interpreter be allowed to help him present his pro se case.

183. On or about January 9th, 2012, Family Court ordered that Defendant Attorney Burke again represent Plaintiff.

184. Thereafter Plaintiff wrote once again to Family Court, unequivocally dismissing his attorney.

185. On or about January 17th, 2012, Plaintiff filed a 3rd motion that the Court should relieve Plaintiff's attorney, allowing Plaintiff to proceed Pro Se.

186. On or about February 10th, 2012, Plaintiff received Defendant Family Court's decision to Plaintiff's 3rd motion dated February 8th, 2012.

187. Family Court denied Plaintiff's motion to proceed Pro Se.

188. Family Court further directed Plaintiff not to send correspondence directly to the Court, and that Plaintiff may only communicate with the Court through his attorney.

-----AA

189. On or about January 25th, 2012, Defendant DSS filed a petition to terminate parental rights for Plaintiff and his wife based on mental illness.
190. Defendant DSS brought new claims of mental illness against Plaintiff.
191. On or about February 3rd, 2012, Plaintiff received Defendant DSS's motion dated January 25th, 2012, which stated that Plaintiff and his wife must be evaluated for mental illness.
192. On or about February 7th, 2012, Plaintiff filed opposition papers against both the Defendant DSS's motion for mental evaluation and their petition.
193. On or about February 17th, 2012, at the Family Court hearing on this matter, Defendant Attorney Burke did not object to the motion for mental evaluation.
194. Family Court ordered that both Plaintiff and his wife have a mental evaluation.

-----AB

195. On or about January 25th, 2012, during a scheduled visitation at Plaintiff's home, Defendant DSS's supervisor Mr. James screamed loudly and angrily at Plaintiff in the presence of Plaintiff's children.
196. Plaintiff's children became terrified and cried.
197. Thereafter, Plaintiff immediately wrote to Family Court about the visitation incident.
198. Plaintiff alleged that Defendant DSS was seeking to justify their new plan to return the children to only Defendant Miriam Teitelbaum [and not the Plaintiff] by creating a new theory that it would be harmful to the children for the Plaintiff to remain in the house.
199. Plaintiff also wrote to Defendant DSS about the incident.
200. Defendant DSS changed the Plaintiff's visitation supervisor.

201. Plaintiff is not currently having visitation because of the difficulties presented since this incident, as it regards his children.
202. Plaintiff is afraid a set up is being planned against him by Defendant DSS.

-----AC

203. On or about July 11th, 2011, Defendant Attorney Burke requested an interpreter on Plaintiff's behalf.
204. Family Court denied the request.
205. On or about January 3rd, 2012, Plaintiff wrote to Family Court, again requesting an interpreter.
206. Plaintiff does not fully understand the English language, nor does he know how to properly speak the English language.
207. Despite these facts, Family Court did not grant an interpreter to the Plaintiff.

-----AD

208. On or about January 2011, Plaintiff's children 'A' and 'B' were moved and began to reside at Defendants Joel and Bluma Tennenbaum's house.
209. Thereafter, Plaintiff child 'A' began to call Defendant Miriam Teitelbaum [their mother] as "Mrs. Teitelbaum" and not "mommy".
210. Instead, Plaintiff child 'A' called Defendant Bluma Tennenbaum "mommy."
211. Plaintiff child 'A' since claims that Plaintiff is not his father.
212. Plaintiff child 'A' since claims that his family name is not Teitelbaum.
213. Instead, Plaintiff child 'A' claims that his family name is Tennenbaum.

214. Plaintiff child 'A' resists getting in the car to attend visitation with his true mother, Plaintiff's wife.
215. Plaintiff child 'A' constantly fights with Plaintiff during visitations, rebelling against any request made by Plaintiff and overall refusing to be friendly or to enjoy the visit.
216. On or about October 2011, Plaintiff and his wife found a family in the community who were willing and able to foster Plaintiff's children.
217. Thereafter, upon information and belief, Defendants Joel and Bluma Tennenbaum discouraged said family from fostering Plaintiff's children.
218. Defendant Joel Tennenbaum claimed G-d punished Plaintiff by removing his children because of Plaintiff's involvement in the religious campaign.

-----AE

219. Upon information and belief, Defendant DSS and certain individuals in the community involved in the matter agreed to return Plaintiff's children to Plaintiff and stop all intimidation and accusation if Plaintiff would willingly stop his religious campaign against forced divorces.
220. However, it is the Plaintiff's belief that it is his religious obligation, as someone who obeys the true Torah teachings and principles, to continue with his peaceful religious campaign. Jewish history is full of events where certain people have tried to change fundamental principles of the Torah and others have fought against that change. It is also documented that those people who have fought against changing the true principles of the Torah have met much resistance.

221. Our sages have foretold that before the redemption of exiles and the coming of the Messiah, there will be very strong movements to overthrow and reform the true teachings of and adherence to the Torah. Through this foretelling, we were forewarned to fight and resist such changes. Plaintiff is trying to uphold the true teachings of the Torah and believes that the opposition and intimidation he and his wife are facing are a fulfillment of this foretelling.

-----AF

222. On April 11th 2012, Plaintiff filed this action to gain protection from the continued harassment and terror and civil rights violation by the Defendants.

223. Since filing this action, the previously ongoing terror, renewed with intensity, it was targeted to stop this Federal action, the religious campaign, and cause Plaintiff to comply with their demands.

-----AG

224. On or about June 2012, Defendant Miriam Teitelbaum loudly approached Plaintiff and his friend Ben Friedman during a private meeting in the street verbally attacking and harassing them.

225. Said Defendant then demanded of Plaintiff and his friend to stop communicating with each other.

226. Said Defendant then harassed Plaintiff and his friend for filing and pursuing this Federal action.

227. Said Defendant then demanded Plaintiff and his friend to stop this federal action.

228. Defendant Miriam Teitelbaum continued to intimidate and harass Plaintiff in the same manner at home for a few days after the above incident.

-----AH

229. Since about April of 2012, Defendant Miriam Teitelbaum began to interfere whenever Plaintiff was on the phone with Ben Friedman and discussing this action.

230. Said Defendant continued blocking the incoming calls from Ben Friedman and others to Plaintiff.

231. On or about the same time, said Defendant seized Plaintiff's private cell phone.

232. Defendant Miriam Teitelbaum stated the reason for the above; that Plaintiff must stop this Federal action.

233. Said Defendant then stated another reason; that Plaintiff should not communicate with his friend Ben Friedman.

-----AI

234. On or about late April 2012, Defendant Miriam Teitelbaum was admitted to mental hospital for a prolonged period.

235. On or about June 1st 2012, Defendant Plaintiff was suddenly caught in surprise when Defendant Miriam Teitelbaum unexpectedly and hurriedly came home from the hospital without any notice.

236. Defendant Miriam Teitelbaum would otherwise always give notice when coming home from a hospitalization.
237. Defendant Miriam Teitelbaum was extremely upset when she came home.
238. Said Defendant at the same time expressed great concern over Plaintiff's recently filed Federal action.
239. Defendant Miriam Teitelbaum then insisted upon and demanded by pressuring Plaintiff that this Federal action must immediately be withdrawn or stopped.
240. On or about May 29th 2012 the US Marshal served the original summons and complaint to some of the Defendants in this action.
241. It appeared as the above service on the Defendant Miriam Teitelbaum family, was the catalyst to Defendant Miriam Teitelbaum aforementioned incidents.
242. At around the same time and since April 2012, other individuals within the community aligned with the Defendants and conspirators, have continually harassed and intimidated Plaintiff for pursuing this Federal action.
243. Plaintiff informed the Court by letter dated June 25th, Docketed in # 163, Exhibit D.

-----AJ

244. On or about June 6th 2012, in the wee morning hours, Plaintiff woke from sleep and saw his bed surrounded by Defendant Hatzalah EMS members and Police.
245. Plaintiff had not called anyone or given permission to enter his home and bedroom.
246. Plaintiff immediately after waking from his sleep and while still in bed was ordered by members of Defendant Hatzalah EMS to get up immediately and go with them to be confined into mental institution.

247. Plaintiff was perplexed and bewildered of this bizarre unexplainable show.
248. Plaintiff then asked members of Defendant Hatzalah EMS why this is happening, as everything was perfectly okay and Plaintiff had been soundly asleep before.
249. In response to Plaintiff's question, Defendant Hatzalah EMS members threatened Plaintiff that failure to allow himself to be confined to mental institution, will result in Plaintiff being arrested immediately.
250. Plaintiff refused to follow the shocking demands from Defendant Hatzalah EMS.
251. Plaintiff then overheard Defendant Hatzalah EMS pressuring Defendant Miriam Teitelbaum to press charges and arrest Plaintiff.

-----AK

252. On or about June 6th 2012 Plaintiff was arrested and criminally charged in the town of Monroe court.
253. Said charges against Plaintiff were false, fabricated and utterly baseless.
254. On said date the local district attorney requested from said court to remove Plaintiff from the marital home.
255. Said Court then issued an order of protection against Plaintiff.
256. Said order of protection allowed Plaintiff to remain in the marital home.

-----AL

257. After the arrest Plaintiff returned home, but later that day left the marital home.
258. On June 7th 2012, a day after the arrest, Defendant Miriam Teitelbaum was admitted to mental institution.

259. Plaintiff upon finding out about said hospitalization went back to the marital home.
260. Plaintiff remained in the marital home until about June 28th 2012.
261. On June 25th 2012, Plaintiff was in Monroe Town Court, for a pre-trial hearing on the false criminal charges brought by the Defendants.
262. The local District Attorney requested an adjournment from said court, stating he had been unable to communicate with Defendant Miriam Teitelbaum.
263. The hearing was adjourned for July 23rd 2012.
264. On About June 28th, Plaintiff received a phone call from Defendant Miriam Teitelbaum, informing him that she is coming home later that day.
265. Plaintiff immediately left the house, to avoid confrontation or further false charges.
266. Since Plaintiff's arrest, Plaintiff often has to take cover or be on the run or in hiding, had to avoid appearing in public in the community, fearing the conspirators would frame him, or would kidnap him again, and avoid ongoing harassment and humiliation, continually orchestrated by the conspirators.
267. The above was communicated to the court in a letter dated July 2nd 2012 (Docket # 163, Exhibit E).

-----AM

268. On or about June 2012, Defendant Miriam Teitelbaum during her stay in hospital, repeatedly demanded Plaintiff to stop this Federal action.
269. On or about June 12th 2012, Plaintiff received a phone call from a social worker at the hospital, stating that Defendant Miriam Teitelbaum cannot be released, due to the pending criminal charges and protection order against Plaintiff.

270. On or about June 13th 2012, a certain Mrs. Pasternak called Plaintiff that the Hospital would not allow Defendant Miriam Teitelbaum to go home, because of her ongoing clash with Plaintiff.
271. On or about June 24th 2012, Mrs. Pasternak called again, demanding from Plaintiff to stop the Federal action immediately.
272. Mrs. Pasternak then recited again that the Hospital would not allow Defendant Miriam Teitelbaum to come home, as long as the criminal charges remain and the clash with Plaintiff continues.
273. Mrs. Pasternak then stated that as long as Plaintiff pursues this action, Defendant Miriam Teitelbaum would not withdraw the criminal charges against him.
274. The above was communicated to the court in a letter dated July 2nd 2012 and given to the court during a hearing on said date, Docketed on # 163, Exhibit E

-----AN

275. On or about June 22nd 2012, a social worker for Defendant Orange County (DSS) called to inform Plaintiff that they will have to arrange visitation time for Plaintiff to see his children separate from Defendant Miriam Teitelbaum, stating this is due to the criminal charges and the protection order from Defendant Miriam Teitelbaum.
276. On or about June 27th 2012, the Defendant Orange County (DSS) social worker called Plaintiff again, asking if he wanted visitation that day.
277. Plaintiff was not barred by the protection order at that time or by any other court order to be near Defendant Miriam Teitelbaum or at home.

278. Said Defendant was aware that Defendant Miriam Teitelbaum was not having visitation during most of June 2012.
279. Defendant Orange County knew that Plaintiff was not having visitation for a long time prior.
280. Said Defendant knew that Plaintiff did not wish to have any visitation arranged or thru Defendant Orange County.
281. See complaint above ¶¶ (AB 195 - 202), where Plaintiff stopped having visitations for fear of a setup due to Defendant Orange County's hostility to Plaintiff during visitations with his children
282. During the aforementioned phone call of Defendant Orange County on June 27th 2012, the Social Worker did not inform Plaintiff about the planned upcoming religious "Payos Opsheren" celebration of Plaintiff's younger child, take place at Plaintiff's home on Friday June 29th.
283. The above was communicated to the court in a letter dated July 2nd 2012 and given to the court during a hearing on said date, Docketed on # 163, Exhibit E.

-----AO

284. On or about July 2012, Defendant Miriam Teitelbaum admitted to Plaintiff, that the agreed plan for June 6th 2012 was to confine Plaintiff to mental institution.
285. Said Defendant then stated that the plan was not to arrest Plaintiff at all on June 6th 2012.
286. Said Defendant also stated that this plan was designed to stop Plaintiff's Federal action.
287. Plaintiff detailed about this plan in this complaint above; see (V) ¶¶148- 154, and (W) ¶¶ 155-161.

-----AP

288. On or about June 11th 2012, Defendant Miriam Teitelbaum subsequently after the arrest wrote a letter dated June 11th 2012, stating that she did not file any charges against Plaintiff.
289. Said letter also states that she would never file any charges against Plaintiff.
290. Said letter further states that she withdraws all charges against Plaintiff.
291. Said letter also states, that she wants to stop Plaintiff's friends who helped him bring this action from communicating with Plaintiff anymore.
292. In a letter to this Court dated June 25th Plaintiff wrote about the above, annexing a copy of Defendant Plaintiff wife's letter above, Docketed in # 163, Exhibit D.

-----AQ

293. On or about June 6th 2012, Plaintiff notified this Court (Docket # 163 Exhibit C) of the arrest and false criminal charges against Plaintiff by the Defendants during that day.
294. On or about June 19th 2012, this Court ordered both Defendant Orange County and Plaintiff to appear in Court regarding Plaintiff's allegations of terror and intimidation to stop the religious campaign and stop this action, (Docket # 10).
295. On July 2nd 2012 in Court during the conference, this court stated it would proceed to discovery.
296. After said conference and until about early November 2012, the terror seemed to have subsided or lessened somewhat.

-----AR

297. Between July 19th 2012 and Oct 9th 2012, various Defendants filed their Motion to Dismiss.
298. On or about October 11th 2012, Plaintiff asked the court to order discovery, necessary to oppose the Motions to Dismiss (Docket # 99).
299. On or about October 23rd 2012 the court denied this request and directed Plaintiff to answer all pending Motions to Dismiss, (Docket # 99).
300. On or about November 5th 2012, Plaintiff filed an opposition to the Motions to Dismiss.
301. Since filing said opposition, the intimidation and terror that had somewhat abated before, now resumed with more vigor, putting Plaintiff under harsh intimidation and pressure again.

-----AS

302. On or about late December 2012, Defendant Miriam Teitelbaum informed Plaintiff that on Dec 24th 2012, the Family Court held a hearing, during which; at the insistence of numerous named and unnamed Defendants it was decided that Plaintiff's wife regain custody of the children once she removes and evicts Plaintiff from the marital home.
303. Plaintiff had been unable to participate in said hearing in Family Court, due to the lack of an interpreter, and due to the court and the Defendants insistence that Plaintiff only appear with an advocate they choose.
304. This is noted in a letter to this court dated December 24th 2012, (Docket # 163 Exhibit F).

-----AT

305. On or about late December 2012, Defendant Miriam Teitelbaum also informed Plaintiff that a certain Rabbi in the community had urged Defendant Miriam Teitelbaum to do everything in her power to cut Plaintiff off from anyone assisting with pursuing this action.

306. This is noted in a letter to this court dated December 24th 2012, (Docket # 163 Exhibit F).

-----AU

307. On or about the first half of January 2013, Defendant Miriam Teitelbaum seized Plaintiff's cell phone.

308. Defendant Miriam Teitelbaum then said that she handed the phone over to a Certain Rabbi within the community.

309. On or about December 2012, Defendant Plaintiffs' wife started interfering again during the phone conversations Plaintiff had with his friends helping him with this action, particularly with Ben Friedman.

310. Defendant Miriam Teitelbaum stated, that this is all done at the guidance and instruction of various Community Rabbis and leaders.

311. Plaintiff notified this court on the above in a letter dated January 8th 2013, (Docket # 163 Exhibit B).

-----AV

312. On or about September 23rd 2012, Plaintiff received a letter from Defendant Bazile (Exhibit C), informing him about an inquest to be held on January 17th 2013, at the Family Court.

313. Said inquest was to be held on the request and behalf of Defendant Orange County (DSS) and Defendant Bazile.
314. Upon information and belief, said inquest lasted for about a week or more lasting thru the week of January 20th 2013.
315. Plaintiff did not participate in said inquest.
316. On or about Saturday January 26th 2013, in the early evening hours during Plaintiff's observance of "Shabos", Plaintiff got served by the Sheriff department with another set of false criminal charges and order of protection, brought by the Defendants, (Docket # 163 Exhibit G).
317. Plaintiff became homeless that evening, during sub zero temperatures, with no ability to take anything but the clothing Plaintiff had on at the time.
318. Said false charges were brought in Orange County Family Court on January 19th 2013, (Docket # 163 Exhibit G).
319. On January 25th 2013, the orange County Family Court issued an order of protection to evict Plaintiff from the marital home, (Docket # 163 Exhibit G).
320. Said charges were brought during the week of said inquest against Plaintiff in Family Court.

-----AW

321. Said charges and protection order was based on the old false charges brought many months prior on June 6th 2012 in Town of Monroe Court.
322. Defendant Miriam Teitelbaum stated in a letter dated June 11th 2012, that she never filed these charges, see Complaint above ¶¶ (AP) 288-292.

323. Plaintiff was on July 23rd 2012, advised by the Monroe Town Court that all the charges have been dropped against Plaintiff.
324. Defendant Miriam Teitelbaum wrote in papers filed in Family Court on Jan 19th 2013, that the charges from June 6th 2012, were transferred from Town of Monroe Court, to the Town of Goshen Court, due to the Monroe Town Court having a negative history with Plaintiff.
325. Said statement was false, and utterly baseless.

-----AX

326. Defendant Miriam Teitelbaum has threatened Plaintiff numerous times before this Jan 19th 2013 criminal offense petition filing, that failure of Plaintiff to stop this Federal action, will result in Plaintiffs arrest.
327. Plaintiff's wife clearly states in said papers (Docket # 163 Exhibit G) that Plaintiff has failed to comply with the Defendants and conspirators demands.
328. Plaintiff's wife also further states in the papers that this failure resulted in the criminal offense petition filing on Jan 19th 2013.
329. This eviction had been planed on by the Defendants long before, to intimidate and harass Plaintiff to comply with the Defendant's demands, see (V) ¶¶ 148- 154, (W) ¶¶ 155-161, and (AI) specifically ¶¶ 234-243.
330. On or about January 27th 2013, Plaintiff notified this court of the events and terror plaintiff is subjected to and as described above.
331. This Court did nothing to stop this intimidation and terror at that time.

-----AY

332. On or about the last week of February 2013, Plaintiff requested from Defendant Miriam Teitelbaum to accept a "*Get*" (Religious Jewish Divorce).
333. Defendant Miriam Teitelbaum refused to accept a "*Get*".
334. Defendant Miriam Teitelbaum also refused to resume to live together with Plaintiff.
335. Plaintiff then wrote in a letter to this court dated January 27th 2013, how this clearly illustrates the bad intent and malice of the Jan 19th 2013 charges by the Defendants and conspirators, designed just to harm, intimidate, and terrorize Plaintiff to comply with their demands.

-----AZ

336. During the two weeks following Jan 19th 2013, Defendant Miriam Teitelbaum, stated numerous times, that unless the following conditions were met she would not accept a *Get* nor resume to live with Plaintiff for the following two years, 1) Plaintiff breaks up all ties with his friend Ben Friedman, 2) stop the religious campaign against forced divorces, 3) completely withdraw this federal action.
337. Plaintiff then informed this court again on Feb 11th 2013, that this clearly illustrates how the conspirators are determined to keep Plaintiff chained and stuck in limbo until their demands are met.

-----BA

338. Plaintiff has been subjected to continuous harassment from others aligned with the Defendant and conspirators in the community, including during the period of Jan and Feb 2013.

339. Particularly outstanding were two individuals, a certain Mr. Yoel Shpitzer and a certain Mrs. Pasternak, who would continually harass Plaintiff to stop this Federal action.
340. Said individuals would harass Plaintiff and make him feel guilty as though the family breakup was his fault.
341. Said individuals demanded and insisted of Plaintiff that he must please his wife at all costs.
342. Plaintiff has in a letter dated Feb 11th 2013, written to this court about the above, (Docket # 163 Exhibit G).

-----BB

343. On Feb 11th 2013, a certain Mr. Yoel Schwartz an acquaintance of the Defendants family confronted Plaintiff during the morning prayers in the synagogue, and in a hasty and threatening manner intimidated Plaintiff advised him that he has one last chance to withdraw this Federal action and religious campaign and get his wife and children back (if this action is withdrawn).
344. Said individual proceeded to inform Plaintiff that unless Plaintiff agrees immediately to withdraw this action, the Judge would dismiss this action as soon as today or tomorrow.
345. Said individual further claimed that he had inside information from a very reliable source associated with the Defendants.

-----BC

346. On the following day Feb. 12th 2013, Plaintiff received in the mail a memorandum and decision of this court dated Feb 11th 2013, dismissing Plaintiff's Complaint against all Defendants who had filed a Motion to Dismiss, (Docket # 138).

347. Upon information and belief, Plaintiff understands that the Defendants and/or conspirators have used political influence to get this court to do a turn about and gain this outcome to dismiss Plaintiff's Complaint.

348. This Memorandum and Decision, did not explain any of the rulings, nor did it give any consideration and ignored Plaintiff's arguments raised in opposing the Motions to Dismiss.

-----BD

349. On February 20th 2013, this court at a hearing denied Plaintiff's motion for default judgment against Defendant John Burke, Defendant John Burke failed to answer for over 6 months.

350. During said hearing, the court asked Plaintiff what he intends to do about Defendants Katz and Tennenbaum, as according to the court they weren't served with the complaint.

351. The court in its Feb. 11th 2013 decision wrote about Defendant Katz only not served.

352. Plaintiff then informed this court that Defendants Katz and Tennenbaum were served according to the Marshals.

353. Later on said date, the court issued an order, directing Plaintiff to inform the court if he intends to move for default judgment against said Defendants, (Docket # 142).

-----BE

354. Thereafter on February 21st 2013, Plaintiff wrote to the court that it appears that Defendants have already answered the complaint.
355. The court thereafter on Feb. 22nd 2013, in an order (Docket # 145) issued an order stating that the court had erred about said Defendants, that they were indeed served.
356. The court permitted plaintiff to amend the complaint instead against these Defendants, as the court permitted to amend against defendants Hatzalah EMS and David Rubenstein, (Docket # 142).

-----BF

357. On Feb 27th 2013, Plaintiff requested from the court clarification on which claims the court permitted to amend in it's Feb 11th 2013 decision as to Defendants Hatzalah EMS and David Rubenstein, (Docket # 155).
358. Plaintiff also requested clarification on the differences among the various Defendants that the court had ruled differently in the Feb 11th decision, (Docket # 155).
359. On Feb 27th, Plaintiff also requested the court to clarify the Feb 11th 2013 decision, how to view Defendant John Burke in relation to the various Defendants the court had differentiated, (Docket # 154).
360. On Feb 28th 2013, the court in an order (Docket # 156) stated that Plaintiff erred by saying the court had allowed only to amend partial claims for Defendants Hatzalah EMS and David Rubenstein, referring Plaintiff to the conclusion of it's Feb. 11th decision.
361. The court then further stated that the pending deadlines to file the amended reconsideration, amended complaint, and opposing the motion to dismiss by Defendant John Burke, and that it will not extend those deadlines.

-----BG

362. On March 3rd 2013, Plaintiff requested again clarification from the court (Docket # 159), explaining that it would be a difficult task to complete said filings, without further clarification from the court on the Feb 11th decision.
363. On March 4th 2013, this court denied Plaintiffs request again, (Docket # 159).
364. On March 5th 2013, Plaintiff once again requested from the court clarification, stating that it is not requesting any relief, rather just a mere clarification, (Docket # 161).
365. Thereafter on said date, this court directed Plaintiff to comply with it's prior order of Feb. 28th 2013, (Docket # 156) as best as he can, and that clarification is not warranted.

-----BH

366. Since Jan 26th 2013 after the eviction Plaintiff has been unable to gain control to necessary clothing still remaining within the control of Defendant Miriam Teitelbaum.
367. On or about March 18th 2012, Plaintiff had through an intermediary requested from Defendant Miriam Teitelbaum to return his religious and holiday garment, which Plaintiff urgently needs for the upcoming Passover Holiday.
368. Upon information and belief, Defendant Miriam Teitelbaum refused to return the clothing.
369. Plaintiff has since the eviction from the marital home requested numerous times from Plaintiff's wife, directly and through intermediaries to return to plaintiff or allow Plaintiff access to his religious books and articles.
370. Plaintiff's wife has repeatedly refused to grant Plaintiff his religious books and articles.

-----BI

371. On March 5th 2013, Defendant David Hollander warned Plaintiff in a very threatening manner directing him to leave the village of Kiryas Joel immediately.
372. Said Defendant further warned and directed Plaintiff to stay out of the village of Kiryas Joel for at least the following six (6) months.
373. Said Defendant further stated that he has the full backing from all the community Rabbis.
374. Said Defendant further stated that the reason for all this is, to cut Plaintiff off from having any ties or communication with his Friend Ben Friedman.

-----BJ

375. Plaintiff as a result of this eviction from KJ been unable to receive any mail correspondence.
376. Plaintiff has since been made unable and has no means to communicate with this or any other court. (Exhibit 'D')
377. Plaintiff has since this incident been in a Homeless condition and is without proper shelter or access to living necessities.
378. Plaintiff remains incapable of directly pursuing this action.

THE ABOVE CAPTIONED PLAINTIFF does, herewith, set forth as his Causes of Action the following claims, to wit;

CAUSES OF ACTION

COUNT ONE

DEFENDANT'S VIOLATION OF THE PLAINTIFF'S CIVIL RIGHTS PURSUANT TO 42 U.S.C. § 1983.

379. Plaintiff repeats and reaffirms each and every allegation contained in paragraphs 1 through 378, above, as it fully sets forth herein.
380. Defendants Kiryas Joel Community Ambulance Corp., County of Orange, David Rubenstein, Atty. Kim Pavlovic, Christine Brunet, Atty. Stephanie Bazile, Atty. John F.X. Burke, Atty. Maria Patrizio, David Hollander, Miriam Teitelbaum, John Does 1 - 95, and Jane Does 1 - 20, in their capacities as State run entities and/or agents of the State of New York or the various political subdivisions contained therein, and acting under the Color of Law, did, both individually and in cooperation with one another, deprive the Plaintiff of his Constitutional Rights pursuant to 42 USC §1983 by and through the 14th Amendment to the United State Constitution.
381. The various Defendants, acting jointly and severally, in violation of the Plaintiff's Civil Rights did deprive him of his freedom, without affording him Due Process under the law, at various times since, on or about April 14, 2010 continuing at this time in that they, without cause, facilitate and in fact confine the Plaintiff to Bellevue Hospital Center, contrary to the Plaintiff's rights and interests.
382. Defendants, acting jointly and severally, did deprive the Plaintiff of his unenumerated Constitutional Right to raise his children in a manner that he deems proper and in his children's best interests in that they sought to and have deprived the Plaintiff of custody and reasonable and unfettered access to his children.
383. The Defendants, in cooperation with religious interests, deprived the Plaintiff of his Constitutional Rights for reasons that are based in the tenants of the religious community prevalent in the area and contrary to the interests of the Plaintiff.
384. The various Defendants, acting jointly and severally, deprived the Plaintiff of his Constitutional Right at various times since about April 11, 2012 in that they severed Plaintiff's access to Court.
385. The various Defendants, acting jointly and severally, deprived the Plaintiff of his Constitutional Right to a fair and just procedure in this action, by influencing the judicial

system not to rule in accordance to the law enshrined in the Sixth Amendment of the Constitution.

COUNT TWO

FALSE ARREST WITHOUT WARRANT IN VIOLATION OF FOURTH AMENDMENT TO THE CONSTITUTION.

386. Plaintiff repeats and reaffirms each and every allegation contained in paragraphs 1 through 385, above, as it fully sets forth herein.
387. Defendants Kiryas Joel Community Ambulance Corp., County of Orange, David Rubenstein, Atty. Kim Pavlovic, Christine Brunet, Atty. Stephanie Bazile, Atty. John F.X. Burke, Atty. Maria Patrizio, David Hollander, Miriam Teitelbaum, John Does 1 – 95, and Jane Does 1 – 20, in their capacities as State run entities and/or agents of the State of New York and acting under the Color of Law, or the various political subdivisions contained therein, did, both individually and in cooperation with one another, intentionally caused Plaintiff to be unlawfully arrested without a warrant and without any probable cause;
388. The Plaintiff was wrongfully arrested by Defendants, on or about June 6th 2012.
389. The Plaintiff was actually harmed in that he had to undergo acute mental suffering, fright, shame, and mortification from the indignity and disgrace, consequent upon his illegal detention; and
390. The Defendants conduct was substantial factor in causing Plaintiff's harm.

Note: A private person does not need to physically restrain a suspect in order to make a citizen's arrest. A private person can make a citizen's arrest by calling for a peace officer, reporting the offense, and pointing out the suspect. In order to establish a false arrest claim, the person detained must prove that the arrest is unlawful and such unlawful arrest resulted in injury. An arrest is unlawful when the police officer in question did not have probable cause to make the arrest¹. Whereas, after liability is established for false arrest, the person who suffered may recover nominal damages as well as compensation for mental suffering, including fright, shame, and mortification from the indignity and disgrace, consequent upon an illegal detention.²

¹ Landry v. Duncan, 902 So. 2d 1098 (La.App. 5 Cir. Apr. 26, 2005).

² Barnes v. District of Columbia, 452 A.2d 1198 (D.C. 1982).

COUNT THREE

**WRONGFUL EVICTION FROM HOME IN VIOLATION OF FOURTEENTH
AMENDMENT (Due Process Clause) TO THE CONSTITUTION.**

391. Plaintiff repeats and reaffirms each and every allegation contained in paragraphs 1 through 390, above, as it fully sets forth herein.
392. The Plaintiff was wrongfully evicted from his marital home by Defendants Kiryas Joel Community Ambulance Corp., County of Orange, David Rubenstein, Atty. Kim Pavlovic, Christine Brunet, Atty. Stephanie Bazile, Atty. John F.X. Burke, Atty. Maria Patrizio, David Hollander, Miriam Teitelbaum, John Does 1 – 95, and Jane Does 1 – 20, in their capacities as State run entities and/or agents of the State of New York and acting under the Color of Law, or the various political subdivisions contained therein, did, both individually and in cooperation with one another, on or about January 26, 2013 in pursuance of a false protection order, obtained from court on the basis of same old false charges, which the Defendant Miriam Teitelbaum had previously admitted to never having filed.
393. The Defendant's intentionally caused the Plaintiff to be wrongfully evicted from his home with an ulterior objective of causing harm to the Plaintiff.
394. The Plaintiff was actually harmed in that he was rendered homeless during sub-zero temperatures, with no ability to take anything but the clothing Plaintiff had on at the time.
395. The Defendant's conduct was a substantial factor in causing Plaintiff's harm.

COUNT FOUR

**DEFENDANT'S VIOLATION OF THE PLAINTIFF'S RIGHTS PURSUANT TO 42
U.S.C. 1985 ACTED IN CONCERT TO DEPRIVE THE PLAINTIFF OF HIS
CONSTITUTIONAL RIGHTS.**

396. Plaintiff repeats and reaffirms each and every allegation contained in paragraphs 1 through 395, above, as it fully sets forth herein.
397. Defendants Kiryas Joel Community Ambulance Corp., County of Orange, David Rubenstein, Atty. Kim Pavlovic, Christine Brunet, Atty. Stephanie Bazile, Atty. John F.X. Burke, Atty. Maria Patrizio, David Hollander, Miriam Teitelbaum, John Does 1 – 95, and Jane Does 1 - 20, in their capacities as State run entities and/or agents of the State of New York or the various political subdivisions contained therein, and acting under Color of Law, did, both individually and in cooperation with one another, deprive the Plaintiff of his Constitutional Rights pursuant to 42 USC §1985.
398. The Defendants acted in concert to facilitate the deprivation of the Defendant's Constitutional Right to his freedom by acting to place him, on or about July 18, 2011 in

Bellevue Hospital Center, a secure mental facility, thereby depriving the Plaintiff of his personal freedom.

399. The Defendants acted in concert to deprive the Plaintiff of his unenumerated Constitutional Right to raise his children in a manner that he sees fit and, further, have continued to deny him custody and reasonable, unfettered access to his children.
400. The Defendants, in cooperation with religious interests, deprived the Plaintiff of his Constitutional Rights for reasons that are based in the tenants of the religious community prevalent in the area and contrary to the interests of the Plaintiff.
401. The various Defendants, acting jointly and severally, deprived the Plaintiff of his Constitutional Right at various times since about April 11, 2012 in that they severed Plaintiff's access to Court.
402. The various Defendants, acting jointly and severally, deprived the Plaintiff of his Constitutional Right to a fair and just procedure in this action, by influencing the judicial system not to rule in accordance to the law enshrined in the Sixth Amendment of the Constitution.

COUNT FIVE

ABUSE OF PROCESS

403. Plaintiff repeats and reaffirms each and every allegation contained in paragraphs 1 through 402, above, as it fully sets forth herein.
404. Defendants Kiryas Joel Community Ambulance Corp., County of Orange, David Rubenstein, Atty. Kim Pavlovic, Christine Brunet, Atty. Stephanie Bazile, Atty. John F.X. Burke, Atty. Maria Patrizio, David Hollander, Miriam Teitelbaum, John Does 1 – 95, and Jane Does 1 – 20, in their capacities as State run entities and/or agents of the State of New York and acting under the Color of Law, or the various political subdivisions contained therein, did, both individually and in cooperation with one another, wrongfully abused the process of law by bringing false criminal charges against Plaintiff in Orange County Family Court on January 19, 2013, obtaining from court a false order of protection on the basis of those charges, and having served that order of protection along with set of false charges on Plaintiff by the Sheriff department on or about January 26, 2013.
405. The Defendants intentionally used this legal procedure to terrorize, intimidate, and frighten Plaintiff into not pursuing this action.

406. The Plaintiff was harmed as a result of Defendants aforesaid abuse or process.

407. The Defendants conduct was a substantial factor in causing harm to Plaintiff.

Note: Abuse of process has three essential elements: (1) regularly issued process, either civil or criminal, (2) an intent to do harm without excuse or justification, and (3) use of the process in a perverted manner to obtain a collateral objective (Board of Educ. v Farmingdale Classroom Teachers Assn., 38 NY2d 397 [1975]).

In New York, a malicious abuse-of-process claim lies against a defendant who (1) employs regularly issued legal process to compel performance or forbearance of some act, (2) with intent to do harm without excuse o[r] justification, and (3) in order to obtain a collateral objective that is outside the legitimate ends of the process." Id. at 179 (quoting Cook v. Sheldon, 41 F.3d 73, 80 (2d Cir.1994)).

COUNT SIX

THE DEFENDANTS HAVE CAUSED THE NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS ON THE PLAINTIFF BY VIRTUE OF THEIR TORTUOUS ACTS TO THE DETRIMENT OF THE PLAINTIFF.

408. Plaintiff repeats and reaffirms each and every allegation contained in paragraphs 1 through 407, above, as it fully sets forth herein.

409. Defendants Kiryas Joel Community Ambulance Corp., County of Orange, David Rubenstein, Atty. Kim Pavlovic, Christine Brunet, Atty. Stephanie Bazile, Atty. John F.X. Burke, Atty. Maria Patrizio, David Hollander, Miriam Teitelbaum, John Does 1 – 95, and Jane Does 1 – 20, in their capacities as State run entities and/or agents of the State of New York and acting under the Color of Law, or the various political subdivisions contained therein, did, both individually and in cooperation with one another, will willful disregard for the Plaintiff's and the Plaintiff's family's well being negligently acted in a manner designed to inflict emotional distress on the Plaintiff and to cause him harm to his spiritual, emotional, and physical well being.

410. The Defendants negligently inflicted emotional distress on the Plaintiff to further the ends of certain of the Defendants to remove the children of the Plaintiff from the custody and care of the Plaintiff and his wife.

411. The Defendants acted in concert to force a separation and potential divorce on the Plaintiff and his wife by offering to reunite the Defendant Miriam Teitelbaum with the children in exchange for her separating from and divorcing the Plaintiff. The negligent actions of the Defendants cause the Plaintiff to suffer emotional distress.

412. The Plaintiff continues to be separated from his family because of the negligent actions of the Defendants and continues to suffer ongoing emotional distress.

COUNT SEVEN

CRUEL, INHUMAN AND DEGRADING TREATMENT IN VIOLATION OF FIFTH, EIGHTH, and/or FOURTEENTH AMENDMENTS TO THE CONSTITUTION.

413. Plaintiff repeats and reaffirms each and every allegation contained in paragraphs 1 through 412, above, as it fully sets forth herein.
414. Defendants Kiryas Joel Community Ambulance Corp., County of Orange, David Rubenstein, Atty. Kim Pavlovic, Christine Brunet, Atty. Stephanie Bazile, Atty. John F.X. Burke, Atty. Maria Patrizio, David Hollander, Miriam Teitelbaum, John Does 1 – 95, and Jane Does 1 – 20, in their capacities as State run entities and/or agents of the State of New York and acting under the Color of Law, or the various political subdivisions contained therein, did, both individually and in cooperation with one another, have intentionally subjected Plaintiff to cruel, inhuman and degrading treatment by taking his children away from him, causing his false and warrantless arrest, effectuating his wrongful eviction from home based on false protection order, and bringing false, fabricated and utterly baseless criminal charges against Plaintiff with ulterior objective to terrorize and intimidate him into withdrawing this action.
415. As a result of the cruel, inhuman and degrading treatment meted out to him by Defendants, Plaintiff has been constantly harmed in that he has been made to suffer acute mental torture and trauma, besides deprivation of home, family, children, and friends.
416. The Defendants conduct was a substantial factor in causing Plaintiff harm.
- Note: “The Courts have recognized that the right to be free from cruel, unhuman or degrading treatment is a universally accepted customary human rights norm.”(See, *Jama v. I.N.S.*, 22 F. Supp. 2d 353, 363 (D.N.J. 1998)).

*“That it may present difficulties to pinpoint precisely where on the spectrum of atrocities the shades of cruel, inhuman, or degrading treatment bleed into torture should not detract from what really goes to the essence of any uncertainty: that, distinctly classified or not, the infliction of cruel, inhuman or degrading treatment by agents of the state, as closely akin to or adjunct of torture, is universally condemned and renounced as offending internationally recognized norms of civilized conduct.” (See, *Tachiona v. Mugabe*, 234 F. Supp. 2d 401, 437 (S.D.N.Y. 2002)).*

COUNT EIGHT

BASED ON THEIR UNIQUE POSITION OF HAVING A FAMILIAL RELATIONSHIP WITH THE PLAINTIFF THE DEFENDANTS BY VIRTUE OF THEIR TORTUOUS ACTIONS INTENTIONALLY INFLICTED EMOTIONAL DISTRESS ON THE PLAINTIFF.

417. Defendant's Juda Katz, Chaya Katz, Yoel Tennenbaum, and Bluma Tennenbaum, David Hollander, Miriam Teitelbaum, by virtue of their familial relationship to the Plaintiff conspired with one another to facilitate their own goals to separate the Plaintiff and his wife and children and in doing so Intentionally Inflicted Emotional Distress on the person of the Plaintiff.
418. Defendants, acting in concert with one another, took custody of the Plaintiff's children from the Plaintiff and his wife and caused those children to call others, not their mother and father, mommy and daddy, thereby intentionally inflicting emotional distress on the Plaintiff.
419. Defendants, acting in concert with one another, have sought to divide the Plaintiff from his wife by counseling her to divorce her husband and by using the Plaintiff's children as an incentive to do so.
420. Defendants have caused false and misleading information to be disseminated throughout the local and close knit Hasidic Community, attempting to bring dishonor and shame on the Plaintiff and thereby Intentionally Inflict Emotional Distress to the Plaintiff.
421. Defendants have acted in concert with one another to permanently deprive him of access to his children and in doing so have Intentionally Inflicted Emotional Distress on the Plaintiff.

COUNT NINE

MALICIOUS PROSECUTION

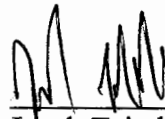
422. Under New York law, "[t]he elements of an action for malicious prosecution are (1) the initiation of a proceeding, (2) its termination favorably to plaintiff, (3) lack of probable cause, and (4) malice." *Colon v. City of New York*, 60 N.Y.2d 78, 82, 468 N.Y.S.2d 453, 455, 455 N.E.2d 1248 (1983). Liability for the tort of malicious prosecution also gives rise to liability under 42 U.S.C. § 1983. *See, e.g., Cook v. Sheldon*, 41 F.3d 73, 77-79 (1994).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for **consequential, compensatory, statutory damages** to adequately compensate Plaintiff for his damages, with attorney's fees, costs of suit, an award of damages as allowed under 42 U.S.C. § §1988, and all such other costs as this Honorable Court deems just and appropriate under the circumstances as may be deemed appropriate. Additionally, the Plaintiff seeks Injunctive relief barring the Defendants from interfering with the Plaintiff's peaceful enjoyment of his family and from continued interference in their lives as any and all injunctive relief that this Court deems just and equitable.

PLAINTIFF DEMANDS TRIAL BY JURY ON ALL COUNTS

Dated at Monroe, in the County of Orange and State of New York this 25th day of April 2013.



Jacob Teitelbaum, Plaintiff Pro Se
c/o Ben Friedman
5 Leipnik Way, #102
Monroe, N.Y. 10950
Tel. No. 845-782-7830

Exhibit

'A'



Edward A. Diana
County Executive

DEPARTMENT OF SOCIAL SERVICES

David Jolly
Commissioner
Box Z, Quarry Road
Goshen, NY 10924
TEL (845) 291-4000 FAX (845) 291-4338
www.orangecountygov.com



Visitation Plan and Agreement

Visit days and times:

Wednesdays 3:30 to 5:00 for Mr. and Mrs. Teitelbaum
Fridays 9:30 to 11:30 Mrs. Teitelbaum ONLY

As per the court orders, Mrs. Teitelbaum has 3 1/2 hours of supervised visitation a week. Mr. Teitelbaum has 1 1/2 hours supervised visitation a week. Mr. Teitelbaum is not to participate in the Friday visits as this time is only for Mrs. Teitelbaum.

Transportation:

Start of visit: The Caseworker assistant will pick Miriam Teitelbaum up at her home at 3:15 on Wednesday and 9:15 on Fridays. The will go to the foster home and pick up the children and return to the home. Mrs. Teitelbaum must be ready to go when the CWA arrives at her home to pick her up.

End of visit: The children need to be packed up and ready to go prior the end time of the visit. The visit ends promptly at 5:00 on Wednesday and 11:30 on Fridays. The car should be leaving the residence at this time.

It is agreed that Mrs. Teitelbaum can ride to and from the foster home with the children both at the start and end of the visit. However, if Mrs. Teitelbaum is not ready to be picked up at the start of the visit the Caseworker Assistant will proceed to the foster home without Mrs. Teitelbaum to pick the children up. At the end of the visits if Mrs. Teitelbaum does not have the children ready to leave at the appropriate time the Caseworker Assistant will get the children ready to leave and take them to the foster home without Mrs. Teitelbaum.

I, Miriam Teitelbaum, agree to the above plan. I understand that if the plan is not followed I will no longer be allowed to ride to and from the foster home with my children.

Miriam Teitelbaum

Date

I, Jacob Teitelbaum, agree to the above plan. I understand that my visitation is on Wednesdays and that I am not to participate in the Friday visitations.

Jacob Teitelbaum

Date

Witness-Kati Gechern

Date

Exhibit

'B'

THE LEGAL AID SOCIETY OF ORANGE COUNTY, INC.

STEPHEN A. BALDINO
PRESIDENT

P.O. Box 328
GOSHEN, NEW YORK 10924
(845) 291-2454
FAX (845) 294-2638

GARY ABRAMSON
CHIEF ATTORNEY

February 9, 2012

Miriam Teitelbaum
20 Getzel Berger Boulevard
(Unit 104)
Monroe, New York 10950

Re: DSS v. TEITELBAUM
FF# 55,083

Dear Ms. Teitelbaum:

As we have discussed several times, I have to advise you that it would be in your best legal interest to live in a separate home from your husband. It is my opinion that your chances of having your children returned to you would greatly increase if your husband were not in your household.

On the other hand, I am concerned that if you decide to continue living with your husband, your parental rights could be terminated. If your parental rights are terminated, you would no longer legally be the parent of Nussen and Yecheskel. Your children could then be adopted by someone else.

Please consider this matter carefully and let me know what you decide to do.

Sincerely,

Maria A. Patrizio

Maria A. Patrizio
Staff Attorney

MAP/ct

Exhibit

'C'



COUNTY OF ORANGE

EDWARD A. DIANA
County Executive

Department of Law

FAMILY LAW DIVISION

COURT PLAZA
14 SCOTCHTOWN AVENUE, 3RD FLOOR
GOSHEN, NEW YORK 10924 TEL: (845) 291-2650
FAX: (845) 291-3014

DAVID L. DARWIN
County Attorney

September 24, 2012

Jacob Teitelbaum
20 Getzel Berger Boulevard, Apt. #104
Monroe, New York 10950

Re: Teitelbaum
Docket No.: B-4109/4110-12
FF No.: 55083

Dear Mr. Teitelbaum:

As you are aware, you were personally served with a copy of the Summons and Permanent Neglect Petition in the within matter. Please be advised that due to your failure to appear at the arraignment in this matter as directed, the Court has set the within matter down for inquest in Orange County Family Court on January 17, 2013 at 9:15 a.m. before the Honorable Andrew P. Bivona.

I strongly urge you to appear in Family Court on the above day; your failure to do so could permanently adversely affect your parental rights to your sons, Nussen and Yecheskel. Family Court is located on the second floor of the Orange County Courthouse at 285 Main Street in Goshen, New York. You will receive no further notification regarding this court appearance.

Very truly yours,

STEPHANIE BAZILE, ESQ.
ASSISTANT COUNTY ATTORNEY

SB/rjm
cc via certified mail, return receipt requested
cc: Hon. Andrew P. Bivona

Exhibit

'D'

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACOB TEITELBAUM,

PLAINTIFF

12 CV 02858 VB

-against-

MOTION FOR
PROTECTIONn

JUDA KATZ et al.

DEFENDANTS

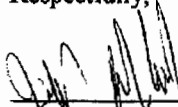
PLAINTIFF JACOB TEITELBAUM, appearing Pro Se, Asks the honorable court to protect plaintiff's rights and instant action, plaintiff's ability to access the court despite numerous attempts, to communicate or make timely filings has been hampered.

Plaintiff asks this court in the meantime to allow Mr. Ben Friedman to continue this action without plaintiff's involvement, Plaintiff will notify the court as soon as he is able to access the court and communicate.

Plaintiff wishes to continue this action, plaintiff's rights are continually violated and his access to court blocked, and is in need of protection, plaintiff does not waive his rights or willingness to continue this action.

Respectfully,

Dated, Brooklyn, New York
April 11, 2013



Jacob Teitelbaum, Plaintiff
Ben Friedman
5 Leipnik Way, #102
Monroe, N.Y. 10950
845-782-7830

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

PLAINTIFF

-against-

JUDA KATZ; CHAYA KATZ; et al.

DEFENDANTS
-----X

**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 **SECOND AMENDED COMPLAINT**, upon

Rebecca Baldwin Montello, Esq.
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by mail

Joel Tennenbaum
Bluma Tennenbaum
16 Lizensk Boulevard, Unit 102
Monroe, New York, 10950
by mail

Dated; Monroe, New York
April 29, 2013



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