

other person to intercept or endeavor to intercept any wire, electronic or oral communication;

(2) intentionally discloses or endeavors to disclose to any other person the contents of any wire, electronic or oral communication, or evidence derived therefrom, knowing or having reason to know that the information was obtained through the interception of a wire, electronic or oral communication; or

(3) intentionally uses or endeavors to use the contents of any wire, electronic or oral communication, or evidence derived therefrom, knowing or having reason to know, that the information was obtained through the interception of a wire, electronic or oral communication.”

21. 18 Pa. C. S § 5704 (4) provides a limited exception for “A person, to intercept a wire, electronic or oral communication, where all parties to the communication have given prior consent to such interception. As such, Pennsylvania is a “two party consent” jurisdiction.
22. On December 20, 2023, Arthur visited his mother at Manatawny Manor and, during that visit, he intentionally used his cell phone to video and audio record conversations with Jane.
23. The video and audio taping was witnessed by “Mary Ellen,” the individual authorized by Pamela Bloomer, Jane’s guardian of the person, to supervise Arthur’s visitation. That visitation was supervised pursuant to previous proceedings in this court and to which Arthur had previously agreed.
24. Arthur video and audio taped both his mother and Mary Ellen, the visitation supervisor.
25. At no time did Arthur obtain proper consent for video or audio taping his mother or Mary Ellen.

26. In fact, this Court has expressly forbidden Arthur from recording via cellphone the supervision of his visits. *See, Exhibit "I," a true and correct copy of the Order dated July 24, 2023.* The supervised visits were arranged by the Court pursuant to Arthur's November 16, 2022 Agreement for such visits and as modified by the subsequent February 16, 2023 Order. *See, Exhibit "K," a true and correct copy of the Order dated February 16, 2023.*
27. Arthur's actions are in direct violation of Manatawny Manor policy, Pennsylvania law regarding interception of oral communications, and previous Orders of this Court.
28. Movant respectfully requests that this Court hold a hearing to determine what sanctions should be imposed and whether Arthur should, once again, be held in contempt for his actions.
29. Movant believes, and therefore avers, that there is a substantial likelihood, based on past history, that Arthur will attempt to disseminate the recordings which he made on December 20, 2023 and that Jane will suffer immediate and irreparable harm to her privacy if the Court does not take action and impose appropriate sanctions and find Arthur in contempt.
30. Without action by this Court, Movant believes, based on the increased stridency and rancorous tenor of Arthur's behavior, that he will likely become further emboldened and will take even more extreme action.
31. Movant also requests referral to appropriate law enforcement for further investigation and charges if believed to be warranted pursuant to 18 Pa. C. S § 5703 and other applicable law.

**IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY,  
PENNSYLVANIA ORPHANS' COURT DIVISION**

**NO. 2021-X2110**

**IN RE: JANE T. HERRING  
AN ALLEGED INCAPACITATED PERSON**

**NOTICE TO ATTEND HEARING  
AND TO BRING DOCUMENTS AND OTHER MATERIALS**

**TO: Arthur Herring, III**  
c/o A. Victor Meitner, Jr. Esquire  
A. Victor Meitner, Jr., PC  
564 Skippack Pike  
Blue Bell, PA 19422  
[vmeitner@AVICTORMEITNERJRPC985.onmicrosoft.com](mailto:vmeitner@AVICTORMEITNERJRPC985.onmicrosoft.com)

You are directed to come to Courtroom 9, Montgomery County Courthouse, Norristown, PA 19401 on **Tuesday, February 14, 2023, at 9:00 A.M.** to testify on behalf of Jane Herring in the above case, and to remain until excused.

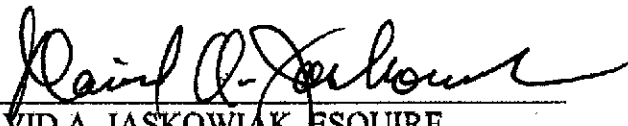
You are directed to bring with you the following.

1. Any and all cell phones or other recording devices of any kind which you have used to take photographs, videos, audio recordings, or similar information of any kind while visiting Jane Herring at Manatawny Manor since October 1, 2021.
2. Copies of any and all photographs, videos, audio recordings or other similar electronically stored information of any kind which you have obtained while visiting Jane Herring at Manatawny Manor since October 1, 2021.
3. Copies of any and all letters, cards, notes, memos and other similar written and/or electronic documentation obtained by or provided to you which contains Jane Herring's handwriting and/or which have been written by her and/or which have been signed by her since October 1, 2021.
4. Copies of any and all written and/or electronic documentation which you provided to Jane Herring in order for her to copy information, make a writing, and/or sign and affix her signature, including but not limited to such documentation as letters, cards, notes, and memos.

If you fail to attend you may be subject to the sanctions authorized by Rule 234.5 of the Pennsylvania Rules of Civil Procedure.

Failure to produce the above-requested materials and information at the time of trial will also result in a request for an adverse inference against you at the time of trial.

Dated: February 9, 2023

  
\_\_\_\_\_  
DAVID A. JASKOWIAK, ESQUIRE  
*Attorney for Jane Herring*

**SENT VIA EMAIL TO:** [vmeitner@AVICTORMEITNERJRPC985.onmicrosoft.com](mailto:vmeitner@AVICTORMEITNERJRPC985.onmicrosoft.com)

1/16/24 58.

IN THE COURT OF COMMON PLEAS  
OF MONTGOMERY COUNTY, PENNSYLVANIA  
ORPHANS' COURT DIVISION

NO. 2021-X2110

IN RE: JANE T. HERRING  
AN INCAPACITATED PERSON

FILED  
JAN 16 2024  
CLERK OF ORPHANS' COURT  
MONTGOMERY COUNTY

**RESPONSE OF ARTHUR HERRING, III TO THE THIRD MOTION FOR  
CONTEMPT AND FOR IMPOSITION OF SANCTIONS**

The Respondent, Arthur Herring, III, having been unable to obtain a public defender nor private counsel, objects to the Third Motion For Contempt filed by Mr. Jaskowisk in that the Motion lists several prior matters for which the Respondent had a hearing, was held in Contempt and imprisoned by the Court by use of its criminal contempt powers to incarcerate, spent time in the Montgomery County Correctional Facility on two occasions in the past, purged himself of Contempt, was released and has not violated any Court Order since that time. The use of prior acts by Mr. Jaskowiak asks the Court to place the Respondent in Double Jeopardy in violation of the U.S. Constitution and all such allegations in the Jaskowiak Third Motion should be stricken.

In response to the Third Motion For Contempt, the Respondent responds and state as follows:

1. Admitted, except Mr. Jaskowiak has never properly represented Jane Herring in that he did not represent her in defense of Jane being declared incapacitated, did not ask her about her being declared incapacitated and has failed to consult Jane with respect to the visitations by her son, the respondent, and failed to allow the introduction of Jane's medical records in all proceedings, failed to allow Jane's appearance in



Pre trial statement

2/7/24

59,

- Answer to Arthur Herring (Filed 12/20/23, e-thread #99)
  - Answer on behalf of Jane Herring (Filed 12/21/23, e-thread #100.1)
  - Answer on behalf of Jill Herring (Filed 12/26/23, e-thread #100.2)
4. Third Motion for Contempt filed on behalf of Jane Herring (Filed 12/21/23, e-thread #100.1)
- Answer of Arthur Herring (Filed 12/20/23, e-thread #101.3)

## B. Statement of the Facts

### 1. Arthur Herring's Behavior

At the root of each and every one of the pending multiple petitions now before the Court is one person: Arthur Herring. Without question, this matter is one of the most, if not the most, litigated post-guardianship matters in Orphans' Court. The litigation has been spawned by one man, Arthur Herring, whose unfortunate denial of his mother's declining cognitive condition and her need for care has led him on an relentless mission of harassment and intimidation against anyone associated with this case—or, for that matter, anyone associated with anyone who is associated with this case. He has threatened anyone who stands in his way from getting what he wants. He is obsessed about a possible inheritance (even at a significant cost to his 98 year old mother and her estate). His ongoing, deliberate refusal to respect any authority, whether those rules established by this Court, those proscribed at law, or those set forth by the facility (Manatawny Manor) for the health, safety, welfare and protection of its residents represents the mind set of one who thinks he is above any real consequences for his actions. His persistent rants and rambling accusations have been vicious, defamatory and threatening.

To be clear, Mr. Herring's behavior is not just of an emotionally distraught, 70 year old man who is upset at the thought of facing the unfortunate reality of his mother's condition. If

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IN THE COURT OF COMMON PLEAS  
OF MONTGOMERY COUNTY, PENNSYLVANIA  
ORPHANS' COURT DIVISION

NO. 2021-X2110

IN RE: JANE T. HERRING  
AN INCAPACITATED PERSON

**MEMORANDUM IN SUPPORT OF PRELIMINARY OBJECTIONS  
TO EMERGENCY PETITION FILED BY ARTHUR HERRING, III,  
ON OCTOBER 19, 2023 TO PROVE WHETHER HE IS A DANGER OR A MENACE**

David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, (*hereinafter, referenced as "Jane"*) hereby files Memorandum in Support of the Preliminary Objections to Arthur Herring's (*hereinafter, referenced as "Arthur"*) "Emergency to Petition to Prove if Arthur Herring is a Danger or a Menace." Arthur's Emergency Petition, which was filed on October 19, 2023, is essentially identical to three other petitions which he filed on that same day, to which Preliminary Objections have also been filed. In each of his petitions, Arthur has demanded the Court's immediate attention to various grievances, rants, and diatribes which he has repeated on numerous occasions throughout the course of this matter, all of which have either already been disposed of by the Court in previous proceedings and/or rulings or are completely irrelevant. Each of the four "Emergency Petitions" are 286 paragraphs, and, but for the title, appear to be an exact "cut and splice" of the averments set forth in the other three petitions. Jane's counsel now objects to these Petitions on her behalf.

From a factual standpoint, the averments in the petitions are improperly pleaded. They are rambling, disjointed, largely incoherent, and factually unfounded. They also address issues

Case# 2021-X2110-88.1.1 Received at Montgomery County Register of Wills Office on 11/06/2023 3:32 PM. Fee = \$0.00. The filer certifies that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

in this matter which have long since been resolved. If required to be answered, significant time and resources will be required and Jane's estate will suffer otherwise unnecessary financial burden occasioned by that response. On that basis alone, the petitions fail to conform to the fundamental rules of fact-based pleading, and each of the petitions should be stricken.

Each of the Petitions should also be stricken as improper because they violate Pa. O.C. Rule 3.9. That Rule further permits the filing of Preliminary Objections where a pleading fails to conform to law or rule of court or includes scandalous or impertinent matter, is insufficiently pleaded, or is legally insufficient. For allegations to be "scandalous and impertinent," and thus subject to being stricken, allegations must be immaterial and inappropriate to the proof of the cause of action. *Btros v. U Lock Inc.*, 255 A.3d 489 (Pa. Super. 2021). Statements in a petition are properly stricken as scandalous and impertinent where those statements improperly cast a derogatory light on the involved parties. *Common Cause/Pennsylvania v. Commonwealth*, 710 A.2d 108 (Pa. Cmwlth, 1998).

In this case, each of the petitions is replete with scandalous and impertinent language. *In just the first 30 paragraphs of each of the Emergency Petitions alone, scandalous and impertinent language permeates the pleading. A small sampling is as follows:*

- Para. 3. "Racket," "crime," "racketeering," "RICO"
- Para. 11. "Clear violation of lawyer ethics and rules."
- Para. 12. "Schemed together several times." "Potential theft of Mother's money."
- Para. 13. "Many lies."
- Para. 15. "Lies about Mother to make people think Mother was crazy for years after my father died."
- Para. 16. "jsh hates her Mother and just wants her to die so jsh can get her inheritance"
- Para. 17. "Victim of nationwide scam called guardianship corruption"
- Para. 18. "Orphans' Court in Montgomery county decade long history of being corrupt involving criminal guardianship by judges"



- Para. 19. "Corrupt lawyer"
- Para. 22. "So called 'evaluation' was worthless and was a scam"
- Para. 26. "Complaint against judge. . . . with the Judicial Conduct Board for corruption"
- Para. 28. "Litigate, Medicate, Steal the Estate. They are play book rules the criminals in guardianship corruptions follow on its victims worldwide."
- Para. 29. Guardianship corruption.
- Para. 30. (Regarding prior contempt proceeding) "Expose the truth of the scam . . . .  
. . . scamming now with a fake guardianship."

The rest of the 286 paragraphs in each of Arthur's "Emergency Petitions" are no better.

In fact, as proof of the rampant vulgarity throughout Arthur's petitions, Arthur has included a "Notice to Plead" in one petition which reads in pertinent part:

You are hereby notified to file a written response to this Emergency Petition for a Hearing to Prove if Arthur Herring is a Danger or a Menace to Jane Herring (2021-x2110) *as He Has Been Accused of Being during the Scam Guardianship, In Other Words Defecate of Get Off the Toilet within ten(10 days from service hereof.....* (Emphasis added).

For these reasons, Objectant respectfully requests that Arthur's petitions be stricken and dismissed in their entirety and that Jane's estate be spared the unnecessary expense of responding to vicious, inflammatory, derogatory, irrelevant and incorrect rhetoric that blatantly violates the standard of Pa. O. C. Rule 3.9 (b)(2).

It must also be noted that Arthur's statements also violate the stern admonition of this Court at the time of the last hearing on October 3, 2023 that it would not allow him to re-litigate issues which had already been heard and ruled upon in prior proceedings. As such, Arthur is violating the rules of *this* court as well as the rules of procedure. For these reasons, Objectant respectfully requests that the Preliminary Objections be sustained and Arthur's Emergency Petition be stricken and dismissed.

Finally, Arthur's four petitions also lack sufficient specificity of the necessary facts to the proper grounds for a Petition for Review and thus violate Pa. O.C. Rule 3.9 (b) (3). Again, the four petitions are largely incoherent, rambling, disjointed, and/or unintelligible. They contain many references to irrelevant matters and/or matters which have already been decided, and it is impossible to provide a concise, legally appropriate response to any of the petitions. Taken in their best light, Arthur's four petitions consist of a series of unfounded conspiratorial conclusions in search of actual facts. As such, Arthur's four petitions have insufficient specificity of the necessary facts to the proper grounds for a Petition for Review and should be dismissed because they violate Pa. O.C. Rule 3.9 (b) (3).

For all of the above-stated reasons, Objectant respectfully requests that the Preliminary Objections to each of Arthur's four "Emergency Petitions" be sustained and that each of the petitions be dismissed.

Respectfully submitted,



DAVID A. JASKOWIAK, ESQUIRE

Identification No. 49753

815 Greenwood Avenue, Suite 14

Jenkintown, PA 19046

(215) 886-7720

FAX: (215) 886-7728

[davidjas@davidjaslaw.com](mailto:davidjas@davidjaslaw.com)

*Court-Appointed Counsel for Jane T. Herring, an  
Incapacitated Person*

DATED: November 6, 2023

61.

IN THE COURT OF COMMON PLEAS  
OF MONTGOMERY COUNTY, PENNSYLVANIA  
ORPHANS' COURT DIVISION

NO. 2021-X2110

IN RE: JANE T. HERRING  
AN INCAPACITATED PERSON

MOTION TO STRIKE FOUR "EMERGENCY" PETITIONS  
FILED BY ARTHUR HERRING, III. ON OCTOBER 19, 2023  
AND TO SUSPEND HIS *IN FORMA PAUPERIS* PRIVILEGES

David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, hereby moves to strike four separate "Emergency Petitions" which were filed by Arthur Herring, III, on October 19, 2023, to suspend *in forma pauperis* privileges which were previously granted by the Court on April 26, 2023, and to grant other appropriate relief for Arthur Herring's ongoing, improper conduct. Movant states the following in support thereof:

1. Movant is David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, by Order of this Court dated May 21, 2021. See, Exhibit "A."
2. Jane T. Herring ("*Jane*") was deemed to be an incapacitated person by Final Decree of this Court dated August 6, 2021. See, Exhibit "B."
3. Pamela Blumer and Ronald Fenstermacher, Esquire, were appointed Successor Guardian of the Person and Estate respectively for Jane on May 13, 2022. See, Exhibit "C."

Case# 2021-X2110-00.1 Received at Montgomery County Register of Wills Office on 10/23/2023 2:06 PM. Fee = \$64.00. The filer certifies that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

4. Arthur Herring, III ("*Arthur*"), is the son of Jane Herring and one of her two children. Jill Herring is the daughter and other child of Jane Herring.
5. Since August 2021 when Jane Herring was adjudicated a legally incapacitated person, Arthur has engaged in a constant, relentless and ongoing effort to overturn the Court's finding of incapacity, to remove the court-appointed guardians, to remove court-appointed counsel for Jane, to undermine efforts to provide necessary care and support for Jane and to harass all parties involved in this litigation (and *uninvolved* individuals as well) with a barrage of vicious emails.
6. Since the August 2021 hearing when the Court entered its Final Decree adjudicating incapacity, Arthur has filed *fifteen* Petitions and Motions, taken *three* appeals to the Superior Court, and has had *two* different legal counsel, both of whom ultimately withdrew as counsel. Arthur also had *another* attorney who withdrew as his legal counsel in July 2021 shortly before the initial guardianship hearing.
7. On April 25, 2023, following the Court's approval of Arthur's last counsel's petition to withdraw as his attorney just four days earlier, Arthur filed a Motion to Proceed *in Forma Pauperis*, asserting that he lacked sufficient financial resources to pay for any Court filings.
8. The Court granted Arthur's a Motion to Proceed *in Forma Pauperis* on April 26, 2023.
9. Arthur has now filed *eight* Petitions and Motions in the last six months since the Court approved his *in forma pauperis* status. Arthur has essentially repeated the same unfounded grievances, complaints, diatribes, rants and accusations against various parties that he has been asserting throughout this matter, the only difference being that the level

of his rhetoric has intensified. Arthur's court filings in the last six months are as follows:

- a. 6/29/23 Emergency Petition to Unsupervised Visitation
- b. 7/26/23 Petition to Remove Ronald Fenstermacher, Esquire, as Guardian of the Estate
- c. 7/26/23 Emergency Petition for Supersedeas Stay of Eviction
- d. 8/9/23 Emergency Petition for the Recusal of Judge Gail Weilheimer
- e. 10/19/23 Emergency Petition for Hearing to Prove if Arthur Herring, III, is a Danger or Menace
- f. 10/19/23 Emergency Petition for Hearing to Remove Pam Blumer and Her Entourage as Guardian of the Person
- g. 10/19/23 Emergency Petition for Hearing to Remove David Jaskowiak as Lawyer of Jane Herring
- h. 10/19/23 Emergency Petition for Hearing to Remove Ronald Fenstermacher as Guardian of the Estate

10. The last four Petitions, which were all just filed within the last week (on October 19, 2023) are each 286 paragraphs. Each Petition, but for the title, appear to be an exact "cut and splice" of the averments set forth in the other three petitions.
11. The averments in the four recently filed petitions are rambling, disjointed, largely incoherent, and factually unfounded. If required to be answered, significant time and resources will be required and Jane's estate will suffer otherwise unnecessary financial burden occasioned by that response.
12. Throughout this matter, Arthur has continually asserted that an inordinate amount of his mother's estate matter has been expended—improperly he contends—on attorney fees. Yet, as a review of the docket indicates, *the majority of the proceedings in this matter after the entry of the Final Decree have been necessitated by Arthur's actions, bad*

*behavior and/or relentless filings. As such, any cost to his mother's estate has primarily been caused by Arthur himself.* In fact, even the initial guardianship proceeding itself was significantly lengthier and more costly than it otherwise needed to have been because Arthur misrepresented certain key facts to the Court prior to and during the trial and he proved to be an incredibly obstreperous witness at trial.

13. Movant respectfully submits that Arthur is now blatantly abusing his *in forma pauperis* status and is, as he has throughout this matter, acting with impunity because he apparently believes he is beyond the reach of financial sanctions. Movant believes, and therefore avers, that the recently filed petitions are intended to harass and intimidate various individuals serving Jane's interests to the point where those individuals will no longer believe that they are able to serve. Essentially, Arthur is now attempting to engage in a war of attrition with anyone standing in his way of obtaining what he wants.
14. By his actions, Arthur is unjustly taxing the resources of the judicial system. It should be remembered that Arthur *just* appeared at a hearing on the issue of visitation on October 4, 2023. It was a hearing on the issue of visitation which Arthur himself had requested, despite the fact that he had not visited his mother Jane in months because he could not have visitation on his own terms.
15. Arthur's improper actions are causing his mother's resources to be needlessly depleted, which, ironically, has been one of Arthur's principal and ongoing complaints throughout this case.
16. Movant respectfully requests that all four Petitions which were filed by Arthur on October 19, 2023 be held in abeyance pending Arthur's response to the instant motion.

Movant also requests that Arthur be directed to file a *concise* response to this Motion within twenty (20) days in the manner required by the rules of procedure or risk the imposition of appropriate sanctions.

17. Movant further requests the Court suspend Arthur's *in forma pauperis* privileges for six (6) months and that his four petitions which he filed on October 19, 2023 be stricken.
18. Movant also requests that Arthur be sternly cautioned that any other filings which he submits, if determined to be in bad faith and/or for an improper purpose, shall also be stricken and that he will be subject to severe sanctions, including but not limited to a complete restriction from any and all visitation and, if necessary, incarceration, for any further violations of this Court's Orders.

**WHEREFORE**, David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, respectfully request that the Court issue an Order directing that:

- (1) Arthur Herring, III's four petitions which he filed on October 19, 2023 shall be held in abeyance until further Order of the Court,
- (2) Arthur Herring, III, is directed to file a response to the instant Motion within twenty (20) days,
- (3) Arthur Herring, III's *in forma pauperis* privileges are suspended for six (6) months,
- (4) The four petitions filed by Arthur Herring, III, on October 19, 2023 are stricken,
- (5) Arthur Herring, III, is sternly cautioned that any other filings which he submits in

this matter, if determined by the Court to be in bad faith and/or for an improper purpose, shall also be stricken, and

- (6) Arthur Herring, III, will be subject to severe sanctions, including but not limited to a complete restriction from any and all visitation of his mother and, if necessary, incarceration for any further violations of this Court's Orders.

Respectfully submitted,



DAVID A. JASKOWJAK, ESQUIRE

Identification No.: 49753

Suite 14

815 Greenwood Avenue

Jenkintown, PA 19046

(215) 886-7720

FAX: (215) 886-7728

[davidjas@davidjaslaw.com](mailto:davidjas@davidjaslaw.com)

*Court-Appointed Counsel for Jane T. Herring, an Incapacitated Person*

DATED: October 23, 2023



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**From:** herthur20 <herthur20@protonmail.com>  
**Sent:** Wednesday, July 21, 2021 10:52 AM  
**To:** David Jaskowiak; herthur20@protonmail.com  
**Subject:** mmse

Mr. Jaskowiak,

It is extremely important that you get from Dr. Kuhar the two MMSE (mini mental state exams) she gave my mother in june 2021 and about june of 2020 including their scores. I am not able to get them from her because for some reason she will not give them to me. She does know about the trial.  
arthur herring III

Sent with ProtonMail Secure Email.

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IFP

10/23

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Movant also requests that Arthur be directed to file a *concise* response to this Motion within twenty (20) days in the manner required by the rules of procedure or risk the imposition of appropriate sanctions.

→ 17. Movant further requests the Court suspend Arthur's *in forma pauperis* privileges for six (6) months and that his four petitions which he filed on October 19, 2023 be stricken.

→ 18. Movant also requests that Arthur be sternly cautioned that any other filings which he submits, if determined to be in bad faith and/or for an improper purpose, shall also be stricken and that he will be subject to severe sanctions, including but not limited to a complete restriction from any and all visitation and, if necessary, incarceration, for any further violations of this Court's Orders.

WHEREFORE, David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, respectfully request that the Court issue an Order directing that:

- 
- (1) Arthur Herring, III's four petitions which he filed on October 19, 2023 shall be held in abeyance until further Order of the Court,
  - (2) Arthur Herring, III, is directed to file a response to the instant Motion within twenty (20) days,
  - (3) Arthur Herring, III's *in forma pauperis* privileges are suspended for six (6) months,
  - (4) The four petitions filed by Arthur Herring, III, on October 19, 2023 are stricken,
  - (5) Arthur Herring, III, is sternly cautioned that any other filings which he submits in

64.

**IN THE COURT OF COMMON PLEAS  
OF MONTGOMERY COUNTY, PENNSYLVANIA  
ORPHANS' COURT DIVISION**

**NO. 2021-x2110**

**IN RE: JANE T. HERRING,  
AN INCAPACITATED PERSON**

**PRE-TRIAL STATEMENT FILED ON BEHALF OF JANE T. HERRING**

Jane T. Herring, by and through her Court-appointed counsel, David A. Jaskowiak, Esquire, hereby files this Pre-Trial Statement in advance of the hearing on multiple pending petitions and motions which is scheduled to take place on February 16, 2024.

**A. Matters at Issue.**

The issues now pending before the Court can essentially be grouped into five categories: visitation restrictions, a potential change of the Guardian of the Person, compensation of the guardian's attorney, annual gifting to Jane's children, and Arthur Herring's ongoing misconduct, disregard for law, court rules and facility regulations. The pending petitions and/or motions are as follows:

1. Arthur Herring's Petition to Remove Guardian of the Person Pamela Blumer (Filed 10/19/23, e-thread #89)
2. Arthur Herring's Petition to Compel Guardian of the Estate Ronald Fenstermacher, Esquire, to Make Compensation to Arthur Herring (Filed 11/27/23, e-thread #95)
3. Pamela Blumer's Petition to Appoint Successor Guardian and for Approval of Fees and Expenses (Filed 12/6/23, e-thread #96)

- Answer to Arthur Herring (*Filed 12/20/23, e-thread #99*)
  - Answer on behalf of Jane Herring (*Filed 12/21/23, e-thread #100.1*)
  - Answer on behalf of Jill Herring (*Filed 12/26/23, e-thread #100.2*)
4. Third Motion for Contempt filed on behalf of Jane Herring (*Filed 12/21/23, e-thread #100.1*)
- Answer of Arthur Herring (*Filed 12/20/23, e-thread #101.3*)

**B. Statement of the Facts**

**1. Arthur Herring's Behavior**

➤ At the root of each and every one of the pending multiple petitions now before the Court is one person: Arthur Herring. Without question, this matter is one of the most, if not the most, litigated post-guardianship matters in Orphans' Court. The litigation has been spawned by one man, Arthur Herring, whose unfortunate denial of his mother's declining cognitive condition and her need for care has led him on an relentless mission of harassment and intimidation against anyone associated with this case—or, for that matter, anyone associated with anyone who is associated with this case. He has threatened anyone who stands in his way from getting what he wants. He is obsessed about a possible inheritance (even at a significant cost to his 98 year old mother and her estate). His ongoing, deliberate refusal to respect any authority, whether those rules established by this Court, those proscribed at law, or those set forth by the facility (Manatawny Manor) for the health, safety, welfare and protection of its residents represents the mind set of one who thinks he is above any real consequences for his actions. His persistent rants and rambling accusations have been vicious, defamatory and threatening.

To be clear, Mr. Herring's behavior is not just of an emotionally distraught, 70 year old man who is upset at the thought of facing the unfortunate reality of his mother's condition. If

that were the case, Mr. Herring would not have taken a hiatus from visiting his mother in the five month period between May through October 2023. Indeed, these proceedings are not really about Jane Herring. It is all about what Mr. Herring wants. To that end, he has been intent on embarking on a campaign of what can only be called "unholy terror" upon anyone associated with this case. That campaign includes verbal abuse, harassment and published defamatory content. More recently, Mr. Herring, in his last visit to see his mother on December 20, 2023, used a cell phone in what has been described by the visitation supervisor as video and audio taping of both his mother and her. For his part, Mr. Herring does not dispute that he was certainly acting like that is what he was doing—if not actually doing it. See, Arthur Herring's Response to the Third Motion for Sanctions, para. 24. Thus, Mr. Herring was either violating Pennsylvania wiretap law or he was "faking it" with the sole intent of harassing, upsetting and/or terrorizing the visitation supervisor. Whatever the answer, his actions served no legitimate purpose, and they were completely unjustified.

Mr. Herring continues to try to make a mockery of this Court's rules by openly flouting them. Considering that he has already had two separate periods of incarceration for his defiance of this Court's multiple orders, he must now be considered a recidivist. The aim of Mr. Herring's plan is simple: Harass, intimidate and terrorize individuals involved with his mother's case until he gets what he wants. The evidence at trial will demonstrate that Mr. Herring has made multiple statements showing his actions are deliberate when he stated:

**"What I recommend is spend a couple of hundred dollars, hire a private investigator . . . then send letters out to their neighbors and tell them what they are and what they are doing. That embarrasses and humiliates them."**

**"That's the same thing that you have to do here. Let the neighbors know what they're doing. It might cause them to think twice about keeping the case."**

While Mr. Herring certainly may have the right to certain free speech protections under the First Amendment, he does *not* have the right to interfere with Jane's care, to harass, intimidate, stalk and demonize care providers, to openly and contemptuously try to force resignations of those individuals providing needed services to Jane, and to flout the Orders of this Court. By his actions, Mr. Herring is purposely interfering with his mother's much needed care. His unjustified behavior must end *now*. And, for Jane Herring's sake, Mr. Herring must be sternly sanctioned by this Court so that it does not happen again.

**2. Resignation of Pamela Blumer as Guardian of the Person and the Nomination of Cynthia Ellis as Successor**

While there is no opposition to the resignation of Pamela Blumer as Guardian of the Person, it should be noted that she has served now for approximately 21 months faithfully and diligently—and under the most difficult of circumstance in light of Arthur Herring's behavior. It is proposed that Cynthia Ellis of 4Life Care be appointed as successor guardian. As set forth in her credentials, Ms. Ellis is highly experienced and eminently qualified to step into this role so that Jane Herring may get the care she requires.

**3. Arthur Herring's Demand for Gifting by the Guardian of the Estate**

Simply put, it is the position of this counsel that Arthur Herring has *no* legal right whatsoever to demand that "annual gifting" take place from his mother's guardianship estate. Mr. Fenstermacher is within his discretion to forego that expenditure, *especially* in light of the

extraordinary cost to which Mr. Herring has subjected the estate by his relentless litigation and  
improper conduct. Furthermore, to provide Mr. Herring with additional financial resources  
would only, in the end, wind up costing his mother's estate more because he is likely to use that  
gift money to fund his unholy war. Mr. Herring's Petition for Compensation must be summarily  
denied.

**C. Witnesses**

The following witnesses are expected to be called at the time of hearing:

1. Arthur Herring (*As-on-cross*)
2. Mary Ellen N. (*Visitation Supervisor*)
3. Pamela Blumer (*Current Guardian of the Person*)
4. Ronald Fenstermacher, Esquire (*Current Guardian of the Estate*)
5. Cynthia Ellis (*Proposed Guardian of the Person*)

Jane Herring and her counsel reserve the right to call any witnesses identified by any other party in their Pre-Trial Statements or as may be referenced in the above exhibits.

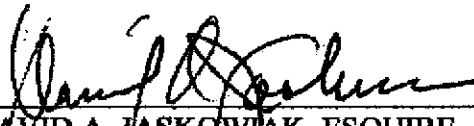
**D. Exhibits**

- P-1. Supervisor Notes
- P-2. Manatawny Manor Notice, RE: Video, Audio
- P-3. Arthur Herring Note to Jane Herring
- P-4. Arthur Herring Business Card
- P-5. 08/06/21 Transcript (p. 190-191)
- P-6. 10/07/21 Order
- P-7. 12/15/21 Order
- P-8. 12/21/22 Order
- P-9. 12/19/21 Order
- P-10. 11/16/22 Supervision Agreement & Order
- P-11. 02/16/23 Amended Order
- P-12. 07/24/23 Order
- P-13. 11/29/23 Email
- P-14. Motion to Demand Removal
- P-15. Arthur Herring Letter Dated 12-18-23
- P-16. Arthur Herring Letter Dated 12-27-23
- P-17. Arthur Herring "Cease and Desist" Letter Dated 2-4-24

- P-18 Excerpts from Arthur's Podcasts
- P-19 "Guardian Problems" Article written by Arthur Herring
- P-20 Copies of any subpoenas obtained and served by Arthur Herring in advance of this hearing
- P-21 Cynthia Ellis' Affidavit of Consent, Criminal Background Clearance, and Insurance Information
- P-22 Excerpts from Court Pleadings

Jane Herring and her counsel reserve the right to amend this list and to use any exhibits identified by any other party in his/her Pre-Trial Statement.

Respectfully Submitted,



DAVID A. JASKOWIAK, ESQUIRE

Identification No.: 49753

815 Greenwood Avenue, Suite 14

Jenkintown, PA 19046

(215) 886-7720

FAX: (215) 886-7728

[davidjas@davidjaslaw.com](mailto:davidjas@davidjaslaw.com)

*Court-Appointed Counsel for Jane T. Herring, an  
Incapacitated Person*

DATED: February 7, 2024



65.

IN THE COURT OF COMMON PLEAS  
OF MONTGOMERY COUNTY, PENNSYLVANIA  
ORPHANS' COURT DIVISION

NO. 2021-X2110

IN RE: JANE T. HERRING  
AN INCAPACITATED PERSON

**MEMORANDUM IN SUPPORT OF PRELIMINARY OBJECTIONS  
TO EMERGENCY PETITION FILED BY ARTHUR HERRING, III  
ON OCTOBER 19, 2023 TO PROVE WHETHER HE IS A DANGER OR A MENACE**

David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, (*hereinafter, referenced as "Jane"*) hereby files Memorandum in Support of the Preliminary Objections to Arthur Herring's (*hereinafter, referenced as "Arthur"*) "Emergency to Petition to Prove if Arthur Herring is a Danger or a Menace." Arthur's Emergency Petition, which was filed on October 19, 2023, is essentially identical to three other petitions which he filed on that same day, to which Preliminary Objections have also been filed. In each of his petitions, Arthur has demanded the Court's immediate attention to various grievances, rants, and diatribes which he has repeated on numerous occasions throughout the course of this matter, all of which have either already been disposed of by the Court in previous proceedings and/or rulings or are completely irrelevant. Each of the four "Emergency Petitions" are 286 paragraphs, and, but for the title, appear to be an exact "cut and splice" of the averments set forth in the other three petitions. Jane's counsel now objects to these Petitions on her behalf.

From a factual standpoint, the averments in the petitions are improperly pleaded. They are rambling, disjointed, largely incoherent, and factually unfounded. They also address issues

in this matter which have long since been resolved. If required to be answered, significant time and resources will be required and Jane's estate will suffer otherwise unnecessary financial burden occasioned by that response. On that basis alone, the petitions fail to conform to the fundamental rules of fact-based pleading, and each of the petitions should be stricken.

Each of the Petitions should also be stricken as improper because they violate Pa. O.C. Rule 3.9. That Rule further permits the filing of Preliminary Objections where a pleading fails to conform to law or rule of court or includes scandalous or impertinent matter, is insufficiently pleaded, or is legally insufficient. For allegations to be "scandalous and impertinent," and thus subject to being stricken, allegations must be immaterial and inappropriate to the proof of the cause of action. *Biros v. U Lock Inc.*, 255 A.3d 489 (Pa. Super. 2021). Statements in a petition are properly stricken as scandalous and impertinent where those statements improperly cast a derogatory light on the involved parties. *Common Cause/Pennsylvania v. Commonwealth*, 710 A.2d 108 (Pa. Cmwith, 1998).

In this case, each of the petitions is replete with scandalous and impertinent language. *In just the first 30 paragraphs of each of the Emergency Petitions alone, scandalous and impertinent language permeates the pleading. A small sampling is as follows:*

- Para. 3. "Racket," "crime," "racketeering," "RICO"
- Para. 11. "Clear violation of lawyer ethics and rules."
- Para. 12. "Schemed together several times." "Potential theft of Mother's money."
- Para. 13. "Many lies."
- Para. 15. "Lies about Mother to make people think Mother was crazy for years after my father died."
- Para. 16. "jsh hates her Mother and just wants her to die so jsh can get her inheritance"
- Para. 17. "Victim of nationwide scam called guardianship corruption"
- Para. 18. "Orphans' Court in Montgomery county decade long history of being corrupt involving criminal guardianship by judges"

- Para. 19. "Corrupt lawyer"  
 Para. 22. "So called 'evaluation' was worthless and was a scam"  
 Para. 26. "Complaint against judge. . . . with the Judicial Conduct Board for corruption"  
 Para. 28. "Litigate, Medicate, Steal the Estate. They are play book rules the criminals in guardianship corruptions follow on its victims worldwide."  
 Para. 29. Guardianship corruption.  
 Para. 30. (Regarding prior contempt proceeding) "Expose the truth of the scam . . . .  
 . . . scamming now with a fake guardianship."

The rest of the 286 paragraphs in each of Arthur's "Emergency Petitions" are no better.

In fact, as proof of the rampant vulgarity throughout Arthur's petitions, Arthur has included a "Notice to Plead" in one petition which reads in pertinent part:

You are hereby notified to file a written response to this Emergency Petition for a Hearing to Prove if Arthur Herring is a Danger or a Menace to Jane Herring (2021-x2110) *as He Has Been Accused of Being during the Scam Guardianship, In Other Words Defecate of Get Off the Toilet within ten(10 days from service hereof).....* (Emphasis added).

For these reasons, Objectant respectfully requests that Arthur's petitions be stricken and dismissed in their entirety and that Jane's estate be spared the unnecessary expense of responding to vicious, inflammatory, derogatory, irrelevant and incorrect rhetoric that blatantly violates the standard of Pa. O. C. Rule 3.9 (b)(2).

It must also be noted that Arthur's statements also violate the stern admonition of this Court at the time of the last hearing on October 3, 2023 that it would not allow him to re-litigate issues which had already been heard and ruled upon in prior proceedings. As such, Arthur is violating the rules of *this* court as well as the rules of procedure. For these reasons, Objectant respectfully requests that the Preliminary Objections be sustained and Arthur's Emergency Petition be stricken and dismissed.

Finally, Arthur's four petitions also lack sufficient specificity of the necessary facts to the proper grounds for a Petition for Review and thus violate Pa. O.C. Rule 3.9 (b) (3). Again, the four petitions are largely incoherent, rambling, disjointed, and/or unintelligible. They contain many references to irrelevant matters and/or matters which have already been decided, and it is impossible to provide a concise, legally appropriate response to any of the petitions. Taken in their best light, Arthur's four petitions consist of a series of unfounded conspiratorial conclusions in search of actual facts. As such, Arthur's four petitions have insufficient specificity of the necessary facts to the proper grounds for a Petition for Review and should be dismissed because they violate Pa. O.C. Rule 3.9 (b) (3).

For all of the above-stated reasons, Objectant respectfully requests that the Preliminary Objections to each of Arthur's four "Emergency Petitions" be sustained and that each of the petitions be dismissed.

Respectfully submitted,



DAVID A. JASKOWIAK, ESQUIRE

Identification No. 49753

815 Greenwood Avenue, Suite 14

Jenkintown, PA 19046

(215) 886-7720

FAX: (215) 886-7728

[davidjas@davidjaslaw.com](mailto:davidjas@davidjaslaw.com)

*Court-Appointed Counsel for Jane T. Herring, an Incapacitated Person*

DATED: November 6, 2023

66.

IN THE COURT OF COMMON PLEAS  
OF MONTGOMERY COUNTY, PENNSYLVANIA  
ORPHAN'S COURT DIVISION

NO. 2021-X2110

IN RE: JANE T. HERRING, AN INCAPACITATED PERSON

**ORDER**

AND NOW, the \_\_\_\_ day of \_\_\_\_\_, 2024, upon consideration of the testimony provided and evidence submitted at the time of hearing on February 16, 2024 and March 20, 2024, as well as the specific request at the time of hearing by court-appointed counsel, David A. Jaskowiak, Esquire, this Court has determined that the unnecessary and unjustified release of personal information about persons associated with this case has had, and will continue to have, a deleterious effect on individuals willing to continue to provide services and care to Jane T. Herring, the incapacitated person. Those individuals include, but are not limited to, past and present care providers, guardians, nursing home facility staff, visitation supervisors and attorneys. The Court specifically finds that certain conduct of Rev. Arthur Herring, III, was not a legitimate, justified expression of his First Amendment rights and that his purpose was improper and deliberately intended to harass, intimidate, threaten and/or terrorize those providing care or services to Jane T. Herring. As such, the release of that personal information presents an ongoing danger to the continuation of necessary care and attention to the safety needs and well-being of Jane T. Herring. Therefore, it is hereby **ORDERED** and **DECREED** as follows:

1. It is strictly forbidden for any individual associated with this case to release the personal contact information of others who are involved in providing care or services to Jane

Herring other than to this Court, to law enforcement, or those individuals who require that information in order to provide care to her. That includes persons involved in this matter in the past and in the present as well as those who may be involved in the future. It further includes contact information about the agencies or companies for whom any service and care providers work.

2. The prohibited release of information encompassed by this Order includes any release by any medium including, but not limited to, emails, texts, publication and/or transmission over the internet or through social media of any kind, dissemination of information to the news media, the mailing and/or delivering of letters and other written memoranda, the posting of circulars and/or handbills, and/or any other release by similar methods of the personal information about individuals involved in this matter.
3. Violation of any aspect of this Order will result in sanctions, including possible contempt and incarceration.
4. All prior Orders and Decrees of this Court shall remain full force and effect, except as modified hereby.

**BY THE COURT:**

**MELISSA S. STERLING, J.**

This Order e-filed: \_\_\_\_\_  
David A. Jaskowiak, Esq.  
Brittany J. Camp, Esq.  
Ronald W. Fenstermacher, Esq.  
Rev. Arthur Herring, III  
Cynthia Ellis

\_\_\_\_\_  
Judicial Court Clerk

67,

**From:** [tomlinher1925@tutanota.com](mailto:tomlinher1925@tutanota.com) [mailto:[tomlinher1925@tutanota.com](mailto:tomlinher1925@tutanota.com)]

**Sent:** Thursday, December 2, 2021 3:17 PM

**To:** David Jaskowiak

**Subject:** jaskowiak

Mr. Jaskowiak,

I have not received your answer.

arthur herring III

--

Sent with Tutanota, the secure & ad-free mailbox.

Date: Nov 28, 2021, 12:10

From: [tomlinher1925@tutanota.com](mailto:tomlinher1925@tutanota.com)

To: [davidjas@davidjaslaw.com](mailto:davidjas@davidjaslaw.com)

Subject: mom

Mr. Jaskowiak,

Since Ledakis said in court my mother can stay at home with a little assistance and since I lived there that was good enough, why have you not demanded she go back home to live?

tomlinher1925@tutanota.com

RE: jaskowiak

Thu, Dec 2 • 19:02

Date: Dec 2, 2021, 16:32

From: [davidjas@davidjaslaw.com](mailto:davidjas@davidjaslaw.com)

To: [tomlinher1925@tutanota.com](mailto:tomlinher1925@tutanota.com)

Subject: RE: jaskowiak

Mr. Herring,

3

I will address your concerns at the upcoming hearing.

**DAVID A. JASKOWIAK**

*Attorney at Law*

815 Greenwood Avenue

Suite 14

Jenkintown, PA 19046

Phone: 215-886-7720

Fax: 215-886-7728

Cell: 215-605-2761

E-mail: [davidjas@davidjaslaw.com](mailto:davidjas@davidjaslaw.com)



68,

**IN THE COURT OF COMMON PLEAS  
OF MONTGOMERY COUNTY, PENNSYLVANIA  
ORPHANS' COURT DIVISION**

**NO. 2021-X2110**

**IN RE: JANE T. HERRING  
AN INCAPACITATED PERSON**

**MEMORANDUM OF LAW IN SUPPORT OF  
PRELIMINARY OBJECTIONS TO PETITION  
FILED BY ARTHUR HERRING, III, ON FEBRUARY 26, 2024  
TO REMOVE DAVID A. JASKOWIAK AS COUNSEL FOR JANE HERRING**

David A. Jaskowiak, Esquire, court-appointed counsel for Jane T. Herring, an incapacitated person, respectfully requests that the Preliminary Objections to Arthur Herring's Petition to Remove David A. Jaskowiak as Counsel for Jane Herring (which Arthur Herring filed on February 26, 2024) be sustained.

As stated in Respondent's Preliminary Objections, which are incorporated herein by reference, the statements made by Arthur Herring throughout the petition should be stricken because they are scandalous, impertinent, and improperly cast a derogatory light on the involved parties. *Common Cause/Pennsylvania v. Commonwealth*, 710 A.2d 108 (Pa. Cmwlth, 1998). His petition is also is replete with vicious, inflammatory, derogatory, irrelevant and incorrect statements that blatantly violate the standard of Pa. O. C. Rule 3.9 (b) (2). As a whole, Arthur

Herring's pleading is largely incoherent, rambling, disjointed, and/or unintelligible and contains many references to irrelevant matters and/or matters already decided (in direct violation of this Court's multiple admonitions). As such, it is impossible to provide a concise, legally appropriate response to his pleading.

Arthur Herring's statements violate the stern admonition of this Court at the time of the two hearings on October 3, 2023, February 16, 2024, and again most recently on March 20, 2024 that it would *not* allow him to re-litigate issues which had already been heard and ruled upon in prior proceedings. To the extent that there is any doubt whether Arthur Herring "got the message" at the last hearing when the Court admonished him about the need for civility, Respondent has attached the two most recent emails written by following the recent Easter holiday. Those emails unequivocally demonstrate that not only will Arthur Herring never abide by the Court's rules (in this case, attempted telephone contact with his mother), he will continue to harass those associated with the case, even at the risk of additional violations of this Court's multiple orders, unless he gets what he wants. *See Exhibit A, attached hereto, which are two emails sent by Arthur Herring only yesterday confirming that he does not intend to change his modus operandi of employing vile invectives targeted at those who are involved in this guardianship.* It is abundantly clear that Arthur Herring is intent on conducting himself in total defiance of normal social convention, propriety, or the rules of this Court. Respondent respectfully submits that Arthur Herring's behavior is totally unacceptable, a danger to all involved, are ultimately harmful to his own mother, Jane T. Herring.

For all of the reasons stated in the Preliminary Objections to Arthur Herring's Petition to Remove David A. Jaskowiak, Esquire as Jane T. Herring's Court-Appointed Counsel,

Respondent David A. Jaskowiak, Esquire, respectfully requests that the Court sustain Respondent's Preliminary Objections and that Arthur Herring's Petition be stricken in its entirety and dismissed.

Respectfully submitted,

*/s/ David A. Jaskowiak*

---

DAVID A. JASKOWIAK, ESQUIRE

Identification No.: 49753

Suite 14

815 Greenwood Avenue

Jenkintown, PA 19046

(215) 886-7720

FAX: (215) 886-7728

[davidjas@davidjaslaw.com](mailto:davidjas@davidjaslaw.com)

*Court-Appointed Counsel for Jane T. Herring, an  
Incapacitated Person*

DATED: April 2, 2024



69.



## UPCOMING EVENTS



**JANUARY 15, 2025**

### Economic/Market Update

Maxine Cuffe, CFA, The Haverford Trust Company

[See Event Details](#)

**FEBRUARY 12, 2025**

### Major Repercussions, Minor Children

Monique Lavender Greenberg, Esq.

[See Event Details](#)

**MARCH 12, 2025**

### Gifting Strategies for Closely-Held Businesses

Peter Moshang, Brian Balduzzi and Rachel Kieser

[See Event Details](#)

## Preventing Elderly Exploitation

**Date:** Monday, September 28, 2015

**Time:** 5:30pm - 8:00pm

**Location:** The William Penn Inn

**Speaker:** Diane M. Zabowski, Esquire, and David Jaskowiak, Esquire

[Add to My Outlook Calendar](#)

[Add to My Google Calendar](#)

As Orphans' Court litigators, Diane M. Zabowski, Esquire, and David A. Jaskowiak, Esquire are involved in cases which focus on the problems that individuals with cognitive decline face. The litigation involves a multi-disciplinary approach because they deal with geriatricians/psychologists/geriatric psychiatrists/neuro-psychologists/social workers/guardians/protective service workers/aging and adult services caseworkers/police officers/detectives/bankers and interested family members.

These cases involve vulnerable elderly people who are susceptible to scams and other designing individuals. With the growing number of impaired elderly people, Ms. Zabowski and Mr. Jaskowiak see more children with a strong sense of entitlement. They want to 'control' their parents' resources, despite competing financial needs demonstrated by the parents.

Planning for our later years is an admirable and necessary goal. Ms. Zabowski and Mr. Jaskowiak get involved in many cases where there has been no planning or the planning goes awry. They will address the concerns that you should have when trying to meet the needs of the more vulnerable senior citizens.

Ms. Zabowski is an attorney in Colleegeville, Montgomery County, PA. She received her Bachelor of Arts Degree in 1980 from King's College, graduating magna cum laude, and her Juris Doctor Degree from Emory University School of Law in 1983, where she was admitted to the Order of the Barristers. She concentrates her legal practice in the following areas: Orphans' Court Litigation, Estate Planning and Domestic Relations. She is court-appointed to represent alleged incapacitated persons.

Mr. Jaskowiak is a sole practitioner in Glenside, PA who has been in practice since 1987. He received a Bachelor of Arts from La Salle College (now University) in 1977, graduating maxima cum laude. He received his law degree from Temple University in 1987, graduating cum laude. His work in the area of elder law now focuses principally on litigation involving elder abuse, financial exploitation issues, filial support, and guardianships. Mr. Jaskowiak also dedicates a portion of his practice to the areas of personal injury and insurance-related litigation.

*Our thanks to Montco Elder Law® for being the sponsor of this program. Materials regarding their services will be made available at the meeting.*

[See Upcoming Event Calendar](#)

70,

COURT OF COMMON PLEAS



MONTGOMERY COUNTY  
THIRTY-EIGHTH JUDICIAL DISTRICT  
NORRISTOWN, PENNSYLVANIA  
19404

PRESIDENT JUDGE  
THOMAS M. DELRICCI  
ASSOCIATE JUDGES  
WILLIAM R. CARPENTER  
RHONDA LEE DANIELE  
R. STEPHEN BARRETT  
THOMAS C. BRANCA  
STEVEN T. O'NEILL  
THOMAS P. ROGERS  
GARRETT D. PAGE  
KELLY C. WALL  
CAROLYN TORNETTA CARLUCCIO  
WENDY DEMCHICK-ALLOY  
PATRICIA E. COONAHAN  
LOIS EISNER MURPHY  
GARY S. SILOW  
RICHARD P. HAAZ  
CHERYL L. AUSTIN  
GAIL A. WEILHEIMER  
STEVEN C. TOLLIVER, SR.  
DANIEL J. CLIFFORD  
RISA VETRI FERMAN  
TODD D. EISENBERG  
JEFFERY S. SALTZ  
WENDY G. ROTHSTEIN

SENIOR JUDGES  
ARTHUR R. TILSON  
JOSEPH A. SMYTH  
STANLEY R. OTT  
BERNARD A. MOORE  
EMANUAL A. BERTIN

July 19, 2021


Arthur Herring, III  
26 Chancery Court  
Souderton, PA 18964

RE: Jane Herring #2021-X2110

Mr. Herring,

I am in receipt of your emails and my assistant, Ms. Copestick has correctly provided you with my response which has not changed. This matter is scheduled for a full day trial on July 29, 2021 in Courtroom 15 beginning at 9:00 a.m. and will not be continued. If you wish to review Dr. Ledakis' report, we will have it available for your supervised review on Wednesday, July 21 at 10:00 a.m. in my conference room. Please confirm by noon tomorrow, via email to Ms. Copestick if you will be appearing for this review. If we do not hear from you by that time, you will forfeit the opportunity.

It is also important for you to understand that you DO NOT represent your mother in this proceeding. David Jaskowiak, Esquire is her court appointed attorney and he will represent her interests. The questions before the Court in this matter are whether a guardian should be appointed and who that guardian should be. You are permitted to present evidence and testimony as to those questions only. Your sister is not requesting to be the guardian, therefore your requests for discovery and attacks on her character are not relevant and will not be permitted as part of the proceeding.



Further, be advised that if you proceed pro-se, which is your right, you are expected to follow all of the rules of court as if you are legally trained. This includes copying opposing counsel when communicating with the court.

Sincerely yours,



Gail Weilheimer

GW/kmc

cc: David Jaskowiak, Esquire  
Brittany Camp, Esquire

4/3/24

Order - Sterling

71.

- d. Initially, each visit shall last one hour and shall not interfere with Jane Herring's meal times. The duration of the visits shall depend upon Petitioner's behavior and may be altered on a visit-by-visit basis.
- e. The Guardian of the Person may request to extend the visitation supervisor's time if additional time is needed at the conclusion of the visit to comfort or reorient Jane Herring.
- f. At no time shall Arthur Herring record, either visually or via audio recording, via any technology whatsoever, the visitation supervisor, the facility staff, and/or his visits with his mother.
- g. Outside of his visits to Jane Herring, at no time shall Arthur Herring have direct or indirect contact with Ms. Harris or The Lincoln Center or her or their property. Any administrative contacts, i.e. regarding schedule changes, shall be made through the Guardian of the Person, Ms. Cynthia Ellis.

Petitioner's failure to comply with any of these conditions will result in the immediate suspension of all visits with the possibility that the Court will hold Petitioner in contempt and charge sanctions. A review hearing on Arthur Herring's Petition for Unsupervised Visitation will be scheduled for August, 2024. Petitioner's compliance with this Order and evidence of positive interactions between Petitioner and Jane Herring, as well as the visitation supervisor and the facility staff, may result in an expansion of visitation frequency and/or time.

**4. Petition to Remove David Jaskowiak as Court-Appointed Counsel for Jane Herring.**

**DENIED.** Petitioner failed to provide the Court with any credible verbal testimony or written evidence that Mr. Jaskowiak is not zealously representing the interests of Jane Herring and acting in accordance with the Pennsylvania Rules of Professional Conduct.

**5. Petition to Remove Pam Blunzer as Guardian of the Person; Petition to Appoint Successor Guardian.**

Oct 3 2022

Dear Mr Fenstermacher,

I agree that Mr Jabkow's legal fees  
prior to contempt hearing be taken out of ~~the~~ <sup>my</sup> ultimate  
share/estate.  
in the amount of \$4,682.47.

72.

Thank you

Arthur Herring III

AH-1

2025 RELEASE UNDER E.O. 14176



Cynthia

73.

**From:** Cynthia Ellis <elliscynthia3@gmail.com>

**Sent:** Monday, March 4, 2024 8:58 AM

**To:** Cynthia Ellis <cellis@4lifecareservices.com>

**Subject:** Fwd: jane herring

Sent from my iPhone

Begin forwarded message:

...

...

**David Jaskowiak**

davidjas@davidjaslaw.com

to: tomlinher1925@tutanota.com + 1 ↗

Wed, Mar 6, 2024 • 06:45

**From**

David Jaskowiak <davidjas@davidjaslaw.com>

**To**

Cynthia Ellis <cellis@4lifecareservices.com>

tomlinher1925@tutanota.com <tomlinher1925@tutanota.com>

**RE: jane herring**

Mr. Herring,

Your use of personal email is inappropriate. Please refrain from doing so. In addition, I would ask that you provide Ms. Ellis with a *short, succinct* list of those issues which you believe are necessary to discuss. Please list those issues in order of priority as you see them. Her entry in this matter should not be viewed as an opportunity for you to re-litigate past grievances. Ms. Ellis' time is very valuable, and I will object to any effort to take her focus away from her responsibilities to your mother.

Thank you for your anticipated cooperation.

**DAVID A. JASKOWIAK**

*Attorney at Law*

815 Greenwood Avenue

Suite 14

Jenkintown, PA 19046

Phone: 215-886-7720

Fax: 215-886-7728

Cell: 215-605-2761

E-mail: [davidjas@davidjaslaw.com](mailto:davidjas@davidjaslaw.com)

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**From:** Cynthia Ellis [<mailto:cellis@4lifecareservices.com>]

**Sent:** Tuesday, March 5, 2024 12:06 PM

**To:** [tomlinher1925@tutanota.com](mailto:tomlinher1925@tutanota.com)

**Cc:** David Jaskowiak

**Subject:** FW: jane herring

12/10/21

~~12/10/21~~

Notes of Testimony  
(Meitne thumb drive)

CONFERENCE

~~12/10/21~~

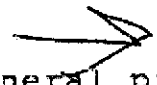
1



are clear and obvious to me. In addition to that,  
though, he has also been contacting Dr. Kuhar's office.  
And, even more --

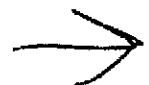
74,

5



THE COURT: Which is Mrs. Herring's  
general practitioner?

7

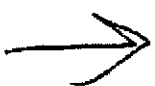


MR. JASKOWIAK: That is correct, the  
long-time general practitioner, at her office up in  
Sellersville. He, in fact, I've been informed, showed  
up at Dr. Kuhar's office early in the morning as  
somebody was opening up the office. That's grossly  
inappropriate, there is no reason for him to be  
contacting the office in that manner; but, nonetheless,  
he showed up there. The Court is already aware that at  
one point he had called the state police for a supposed  
well-check when there was no reason for one.

17

THE COURT: Multiple well-checks on the  
same day, I believe.

19



MR. JASKOWIAK: Yes. And the problem is  
what Mr. Herring is trying to do is basically establish  
what I would loosely call a shadow guardianship, where  
he thinks he is in control. And he is vicious towards  
anyone who stands in his way.

24

I find it dismaying that he wouldn't  
have had the courtesy to email all the rest of us as

25

To the Honorable Judge Carolyn Carluccio  
President Judge, Montgomery County  
Court of Common Pleas

75.

November 14, 2023

Dear Judge Carluccio,

I am writing you because you are the President Judge and you have administrative supervisory powers of the court divisions. This matter involves a very tragic situation of guardianship corruption in the Orphans Court that has occurred on my, now 98.5 year old Mother, Jane Herring, 2021-x2110. The Orphans Court, in Norristown, has a decades long history of corruption of cases involving corrupt guardians, corrupt lawyers and judges stealing money from the victims through guardianships. My mother and I have always had a very close and loving relationship. Because of what happened to my Mother, after she was falsely guardianized, I created a very large news website that shows the massive corruption of orphans courts and guardianships nationwide. I continue my fight to get her back home to where she was living happily for 21 years in Souderton.

Because of the fake guardianship on her by Judge Weilheimer, various corrupt lawyers, corrupt psychologists and corrupt guardians, since October 2021 my mother has been forced to live in solitary confinement, in a sensory deprived environment in a low rated nursing home in Pottstown. She has not been allowed outside into society or allowed to go back to her large 3 bedroom, 3 bath house in a gated community to see her loved possessions by her past and present guardians, their lawyers, Jaskowiak, my sister or by Weilheimer. I sent a packet of documents to you in August about this matter, but I never got a response from you.

Because I had spent all of my money for a lawyer for only a short time when the petition was first filed, I was pro se during the petition hearing. As a retired criminal investigator of 41 years, I proved the psychologist, Ledakis, had absolutely no proof of accuracy in his "evaluation" of my Mother. He also never audio or video recorded her session to prove he ever gave it, what my Mother said or did not say or how she did on the tests that Ledakis gave her. Ledakis also admitted all of his tests he simply downloaded from the internet and NONE of them had any independent proof of accuracy. Because he never audio or videotaped his "sessions" even his reports cannot be accepted as pertaining to a specific person, instead of 20, 50 or 500 other people by using a simple cut and paste of their names.

On August 6 2021, my Mother was declared "incapacitated" by Judge Weilheimer. But, the problem is, it was only based on fraud. The one and only lawyer Weilheimer assigned to Mother, Jaskowiak, refused to bring her in to testify for herself and he refused to bring in any of the professionals she dealt with every year to show Mother had no problems to be guardianized, including no medical issues, no financial issues, no unpaid bills, no bizaare check

amounts, no checks to strange people, no mental problems that would cause her to be a danger to herself or others, etc. Those facts proved she did not need any guardians. Jaskowiak refused to defend her against guardianship because Jaskowaik WANTED her to be guardianized so he and others, operating as a "Racket" could then steal from her as is done nationwide in guardianship corruption cases. Jaskowiak and the other lawyers of the guardians have refused to follow Pennsylvania Rules of Conduct for lawyers and MOST important, Title 20, section 5521 that pertains directly to guardians, guardianships and how the victim is to be treated. Pennsylvania is classified as the least restrictive state pertaining to demanding the least restrictive way a person can be taken care of before guardianship.

Her daughter (then 70 and my sister) filed the petition only to take control of my Mother and control of her vast estate, which often is the reason when a family member files such baseless petitions. My sister has hated her mother and me (then 67) all of her life for unknown reasons. She never put one example in her petition where my Mother needed guardianship. Shortly after she filed it to be the guardian, she withdrew her name because I had submitted a discovery list because I knew she had been stealing money from my Mother for about 8 years since our father died. My sister found out about guardianship only because Fenstermacher, my Mother's and my trust lawyer of about 20 years and current guardian of estate since May 2022, had been helping my sister to try to steal money from my Mother for years. I always stopped those attempts. Weilheimer appointed Fenstermacher. In February 2023, Fenstermacher admitted in court he had not seen or talked to my Mother for about 2.5 years, but he has been making various and very serious financial decisions for her without consulting her. That is violating the Pennsylvania Rules of Conduct for lawyers.

Since then, Fenstermacher has approved unlimited money, for made up billing hours by the other guardian, pam Blumer, her husband Bill (lawyer and friend of Jaskowiak) and other lawyers in Blumer's large law firm, a "care manager" Deb Klock, who has a long history of over drugging and theft from her clients and Jaskowiak.

My Mother was kidnapped (taken away by force, against her will, for monetary gain) from her home on August 25 2021 by my sister and first guardian Logie. When Logie arrived that day he brought 2 local police to hold me on the porch while my mother was kidnapped by my sister. I saw and heard my mother screaming and crying saying she did not want to go with my sister. My sister admitted in court she never discussed filing the petition with my mother or me. She said she did not think it was that important. During the almost 2 weeks Mother was held as a prisoner at my sister's home, my Mother was deprived of going back home and was not allowed to see or talk to me while she was kept at my sister's house. Mother was forced on anti depressents the first day she was there because she did not want to stay there. That night, I called the police to do a wellness check on Mother because of what happened. Two days later, Weilheimer threatened me on the phone with prison if I ever called for another wellness check. Why? That same day, Mother's weekly hairdresser of 16 years said after my sister dropped her off for a appointment, Mother was shaking and crying saying "I

want to go home, I want to go home". After about 2 weeks of being imprisoned by my sister, my Mother had to be taken to the hospital, unconscious, by ambulance, confined to bed for 6 weeks, treated for starvation, daily blood tests (42 times), daily needles in the stomach (42 times) to prevent blood clots. At week 5 in the hospital, my mother got covid where she could have died.

At week 6, Logie dumped Mother into a low rated nursing home that had just opened after a massive covid outbreak. Months later, Mother would also get covid and influenza because of massive outbreaks there. Again, she could have died from them. Since October 2021, she has been held as basically a prisoner in a locked in section for no reason. Ledakis said in his original report Mother had no problems with daily activities and with me living there for about 1.5 years and seeing her everyday for dinner since my father died 7 years before, everything was fine. In fact, my mother was still driving her car safely and her primary doctor of 21 years never said she should stop driving. That doctor saw Mother about 1 month after the petition was filed and there were no medical or any other issues at all. At that time, Mother was only taking a very low dosage pill for blood pressure. Nothing else.

I have been trying to get my mother back home for over 2 years. Weilheimer, jaskowiak, guardians, their lawyers, a "care manager" and my sister (Racket) have refused to let her go back home to enjoy her life, freedom and loved possessions. No reasons given. Because I exposed the Racket's fake guardianship just for Mother's money and her house, they have been slowly denying me visits, had eliminated phone calls with Mother and have demanded paid "monitors" (friends of Blumer) since November 2022 to write lies in their reports about me of what they claim I say to my mother and claiming for 2 years I "agitated" my mother. No one has ever asked my Mother if that was true. She has never refused any of my visits or phone calls. The fact is, in front of staff, she has cried openly when she sees me on visits. The "Racket" has never had one person from the facility in court or write in their reports that I did agitate Mother. That is called here say. It is all about "demonizing" a person with lies to keep them from their loved one. That tactic is used nationwide by corrupt guardians to keep families knowing how their loved ones are being abused and neglected. I have found many, many, many problems at the facility and to Mother, but the guardians and their lawyers refuse to correct them. But, the Racket use my complaining to make massive billing hours for themselves. That tactic is also used nationwide by other corrupt guardians and corrupt lawyers.

The cost of the nursing home is about \$90,000 a year compared to the court accepted cost of Mother's home of only \$16,500 a year. There is a complete spare bedroom and bathroom for any day care worker to use if Mother ever needs their help. There is NO reason why Mother, at 98.5, should be kept locked in a tiny section and away from society and freedom. Such confinement deeply affects her mental and physical abilities.

About mid 2022, Weilheimer was rotated out of orphans court and into civil court. But, she kept Mother's case and probably other such cases with people with a lot of money. My

Mother's house value is about \$500,000 and she had about \$2 million in liquid assets before this guardianship scam on her. Weilheimer continued to make rulings and orders, all against the benefit and health to my Mother. Several months ago, I filed a complaint against Weilheimer with the Judicial Conduct Board for corruption and I filed complaints against Jaskowiak and Fenstermacher for corruption. Fenstermacher is approving all invoices by the Racket without justification and refusing to let my Mother come back home or go to a much nicer, much bigger and much cheaper place to live, especially to save her money, for her health and wellbeing. He has been wasting her money on a guardianship fraud. About 9 months ago, Fenstermacher signed off to sell Mother's house, without asking her, which violates Title 20, section 5521 and the Rules of conduct for lawyers in Pennsylvania. He had me evicted on August 25 2023 and has refused to give Mother's gift money to me that she gave to her children for 7 years instead of presents and Fenstermacher gave to us for the past 2 years from Mother. Because I spent about \$100,000 on legal and other costs to bring mother home, I have been on welfare for over a year and since Fenstermacher had me evicted, I have to live in my car.

About (guessing) several months ago, Weilheimer was replaced by Judge Sterling. But, I was told a order was signed recently by Weilheimer. I have been told by various lawyers that after Weilheimer was rotated out of orphans court and into civil court, any orders or rulings, including evicting me, are null and void. Since you are President Judge and you have administrative supervisory powers, I need your help to help my mother get justice and to void those orders and other decisions by Weilheimer since Weilheimer was rotated out of orphans court.

I had contacted the DA's office about 2 years ago about this guardianship corruption, but Det. Shade refused to open a case. He also refused to call all of the people back who had their cases of loved ones being scammed by fake guardianships in Montgomery County. Shade then told Weilheimer that I wanted to file a complaint against her for corruption. On November 13 2023, I contacted Det. Kelly of the DA's office. He also refused to open a case on Weilheimer, the guardianship corruption on my Mother and also what Weilheimer had the county IT person, Olivieri, do for her. About June 2023, Weilheimer had Olivieri block my email address to her office and to all county agencies, including DA, sheriff, politicians, elder agencies and many others. Weilheimer did so as retaliation for me exposing her and the guardianship corruption on people in orphans court and to greatly delay my abilities to help Mother. Kelly has also refused to call back those same people who contacted Shade.

Weilheimer also had my court docket blocked so I could not see my documents to this day. I filed a petition a week ago demanding she unblock my email address. Agent Pacchioli, FBI, also has refused to open a case of guardianship corruption on Mother and has refused to call the many people who have called them with their cases of guardianship corruption. I had supplied the DA and the FBI with many, many documents. The FBI claims it is a civil matter, not

criminal. Financial exploitation of the elderly is a criminal matter. Some of those documents I am enclosing.

Jaskowiak and Weilheimer put me into prison twice in 2022, because I put information on my news website exposing their guardianship scam. In October 2019, Jaskowiak bragged in a legal seminar about guardianship that he uses contempt of court and prison to get his way and to make money. He did that twice on me. Weilheimer put me into prison twice for about 3 weeks total time for exposing the guardianship scam on my Mother.

I am hoping my information and supplied documents will prove my Mother should not be allowed to rot in a locked in section until she becomes broke, a vegetable and dies because of lack of care and over drugging as another victim of guardianship corruption. I need you and your authority as president Judge to void all of those orders and all decisions by Weilheimer since she was rotated out of orphans court because she is no longer in orphans court. Mother's husband and my father worked extremely hard all of his life and made money for his wife and children to live well. His/Mother's money is NOT the Racket's money to steal just so THEY can have a higher life style.

On November 13 2023, Gelsing, one of the many lawyers pam blumer, guardian of person to Mother and her husband is close friends to her husband Bill, hired and my Mother has to pay for, emailed me to say mother had a serious fall recently and has many bruises. He did not give any details or say when it happened. Mother has fallen before on the waxed floors and she hit her head, but neither the nursing home, Blumer or jaskowiak ever demanded her head be xrayed, only her hip. I had bought her no slip socks to prevent that, but the staff refuses to put them on her. Blumer and logie refuse to put a phone in her tiny room or to get her a medical alert necklace in case she falls, heart attack, etc. The staff is basically never at their desk to hear her. If mother was at home, she has carpets and I would usually be there to take her to the hospital if needed.

Also, EXTREMELY important, to this day, there was NO written order by Weilheimer to have my Mother kidnapped from her home and in secrecy from me on August 25 2021. WHO ordered the kidnapping of a 96 year old woman and WHY? Was it Logie, Weilheimer or Jaskowiak? Did Weilheimer order it WITHOUT writing an order? If so, WHY did Weilheimer do so? If it was not jaskowaik, WHY would he let such a drastic thing happen to his 96 year old client and not order Mother back home as Ledakis said she could stay for Mother's wellness and happiness? In Logies notes, he referred to it as the "plan" several times to other lawyers and to my sister. That proves it was only to get Mother's money and her house as part of the guardianship corruption scam. The guardianship scam on people includes the guardian selling the house extremely cheap to a friend who then resells it at full value. The Racket keeps the profit and the victim and their family never know it was resold for a much higher price and they lost that money.

My email is

. My phone is 215.960.4447.



Sincerely,

Rev. Arthur Herring III

## EXHIBITS

1. Weilheimer letter to me saying she blocked my email address to her office.
2. Olivieri's email to weilheimer saying he blocked my email address to all county agencies.
3. Title 20, section 5521 per guardians and guardianships.
4. Part of Ledakis report saying Mother had no problem with daily activities and she could stay at home.
5. Before the trial for my first contempt of court charge, I asked jaskowiak several times that since Ledakis said Mother could stay at home, why isn't she at home? He did not respond. Then he said a few days later, he would tell me at my hearing. Jaskowaik never did. He told Weilheimer he wanted me in prison for 6 months for exposing my mother's name and violating her privacy. But, he knew people can be murdered in prison. Was that how desparate he was to have the son of his client murdered just so he can steal her money?
6. My mother's note to Fenstermacher, about 2 years before the petition was filed saying she always wants me to live in her house.
7. Another note by mother saying how much she trusts me for her care. She wrote that about the same time as #6.
8. Another note written by Mother saying she wants me to care for her if she ever needs it.
9. Pictures of my Mother about one year before she was guardianized by Weilheimer and forced to live in the nursing home in solitary confinement and in a sensory deprived environment for 2 years now.
10. My mother only one year after she was forced to live at the nursing home with

no freedom and not allowed into society or go home to see her possessions of 98 years.

76.

September 1, 2021

Honorable Judge Thomas Del Ricci  
President Judge, Montgomery County Court

Dear Judge Del Ricci,

I am asking for your help in this extremely serious matter. The matter involves my 96 year old mother and the recent trial in the Orphans Court by Judge Weilheimer. I am enclosing this letter and some documents that will clearly show how incapacitation is determined and choosing a legal guardian is nothing short of gross incompetence by the court and others, a disaster.

To begin, I am 67 years old and had a 41 year business doing lie detection testing nationwide. A year ago, my 70 year old sister, Jill Herring (JH) tried to get complete control of my mother's finances for her own personal use. I stopped it. On May 17 2021, the day after my mother's 96<sup>th</sup> birthday, my sister had hired a lawyer and signed papers for the petition to be her legal guardian. JH never discussed this serious action with my mother or myself before she signed the papers, especially since she is our mother. My mother's house is worth about \$350,000 and she has about \$2 million in cash in her Raymond James account. My mother is in fantastic physical, medical and mental health. She does not use a walker or cane. She sees her doctor 3-4 times a year. All of mother's monthly bills are auto paid, she owns her 21 year old car she bought new and the 21 year old house that was built new that never had a mortgage. Mom lives off of just a very small part of the interest her investments make. My mother has never abused or misused her Raymond James money in any way, such as writing weird checks to strangers or writing huge amounts for no reason. Mom has a housekeeper come in only once a month for 2 hours and she goes to the hairdresser once a week. In June 2021, she saw her doctor again and had a once a year blood test. The blood test came back so good, Mom was taken off one of her two very low dosage pills. She now only takes one very low dosage pill for cholesterol. Until May 2021, she still drove her car, no tickets or accidents in 50 years. She stopped driving only because her license expired and she did not do much driving anymore. Many times my mother drove the car with me in it and she had no problems driving. She reads the newspaper every day. She has about a 20% or so problem of instant recall and memory issue. She has about a 25% hearing loss, but does not want a hearing aid. My mother still knows right from wrong and still has common sense. Neither her doctor or JH ever said she should not drive because she still had those abilities. My mother still cooks dinner, does not burn it or undercook it that would cause food poisoning. My mother does not have any of the courts requirements for incapacitation.

Since my father died about 9 years ago, I have been with my mother every day for dinner, about 6 hours each time. That is about 3,000 days or about 18,000 hours. I know my mother better than anyone. She and I have an extremely close and loving relationship all of our lives. My mother had told both her court appointed lawyer Jaskowiak, her court appointed guardian Logie and the court appointed psychologist, Ledakis, many times how much she only loves me and trusts me to take care of her and make any type of decisions (medical or financial) for her when she needs advice before she makes decisions. My mother told them she did not want sister in that way. My sister never wanted me in her life and in fact, when JH lied about me in court many times proves how much JH hates me. JH has never cared for or liked my mother at all. She loved my father and was extremely close to him. He gave her many expensive financial gifts.

About 2 or 3 years ago, JH started to send disgusting emails to people my mother does business with and about me. JH sent many of those letters to my mother's doctor, Kuhar (one enclosed). JH claimed my mother was crazy and I was manipulating her just for Mom's money. The fact is, in 2020, it was JH who had tried to steal money from my mother by trying to trick me into signing an agreement that would have given JH complete control of my mother's money to use any way JH wanted without any interference from me. I refused to sign it. Later, I found that JH, at least twice, had money type assets sent to herself instead of sending them to Mom.

JH spent, I estimate, about \$20,000 or more for a lawyer, to file the petition to be a legal guardian over my mother. JH made up various lies about my mother and stated many lies about me in the petition and in court. JH knew if

she became a legal guardian, she could have absolute control to spend/ invest my mother's money in any way she wanted and make any decisions over my mother, with the Orphans Court to back her up against my objections.

JH continued the guardian action for about 2 months. About that time, I had my lawyer (who I had to fire for incompetence and serious attitude problems) send JH's lawyer (Camp) a 22 item discovery list that would have exposed what JH had done to my mother. The very next day after Camp got my list and told JH, JH dropped her petition because of what those documents would have proven, including diverting financial checks to herself and not paying back a \$100,000 loan from my parents 12 years ago.

Every business has problems. During my 41 year business doing lie detection testing, I have found people selling unreliable gadgets who claim they are lie detectors. As with every product sold, fake ones give the real ones a bad reputation. About 3 years ago, a conman, in Florida, sued me because I have been exposing his 31 year scam on various law enforcement types nationwide. He has sold fake "voice lie detectors" and made up training to about 2,700 departments so far. I estimate he has made about \$100 million in his scam so far. Millions of criminal cases have been ruined and millions of innocent people have been falsely accused. In Pennsylvania, about 73 police departments (3 in Montgomery County) and 6 district attorney offices bought those gadgets at \$10,000 each and training is \$1,400 per person. No independent study has ever said the accuracy of his "voice lie detectors" are any better than about 50%, a coin toss. The scam has been exposed by many news media for 30 years. Because of my information to them, ABC News in 2005 (see included) did a major investigation and put it on TV. Because of my information, in 2019, the Florida attorney generals office opened an investigation on them for fraud, mail fraud, money laundering and others. I have contacted many law enforcement types and others to warn them about the scam. Because I cost the conman many millions of dollars in lost sales by exposing him, in 2018, the conman hired 3 different law firms to sue me to put me out of business. I wasted almost all of my money on a lawyer and then I had to be pro se. Of course, I lost and the judge gave them a \$850,000 judgement in December 2019, even though he said the plaintiff had not provided any proof of any losses. In February 2020, I filed bankruptcy only because of the judgement. The entire amount was discharged in April 2021. I was able to keep my 2 old cars and my 40 year old mobile home. But, for only a very short time because of the petition by my sister.

My bankruptcy lawyer told me not to pay my monthly house lot rent of \$800. When the bankruptcy concluded, I owed about \$11,000. I was going to pay it off to keep my house when my sister dropped her fake petition on my mother and I. Even though my mother got a free court lawyer, we did not know if he was any good. I then hired a lawyer to be sure my mother was getting the best legal help. Because I used my money from the bankruptcy, I lost my house, a car and money. I had no more money for a lawyer and had to proceed pro se. I did the best I could during the trial.

Since my sister dropped out to be a guardian, it was either a total stranger who would make all types of decisions, including medical, financial and life support or me, a brother who she has hated all of her life for no reason. JH spoke many lies during the trial about me and told a few to Ledakis, the court appointed psychologist. JH stated in the petition she called the police and told them I kicked her in the back (copy included) at my mother's house in February 2020. She told them I was a violent person and I was moving in to my mother's house only to take my mother's money. But, JH changed her story in court. In court, JH said I tried to murder her in February 2020 by trying to push her down very steep steps at my mother's house. JH said as I was doing so, I was "laughing in a demonic way" and she "could see my eyes roll back into my head", then she "could see the whites of my eyes". She told more lies. She told Ledakis that my mother and I had a "romantic campaign." She has written letters to Mom's medical doctor of 20 years and to her financial advisors at Raymond James saying my mother was crazy. Because of JH's letters to Raymond James, their legal department said my mother could not make any sizeable money changes without the approval of my sister and I. If we did not agree, then my mother's estate lawyer, Fenstermacher would be the "referee". Clearly, JH is not normal.

Ledakis's so-called "evaluation" of my mother lasted only about 2 hours. He wrote in his report Mom is totally incapacitated. He only spent about 2 hours with her talking and giving her a few paper and pencil tests that he admitted in court had no independent tests to prove their accuracy. How could he come to such a conclusion? There are many, many things people do during the day that require intelligence and brain functions, such as cooking. My mother drove her car until 3 months ago when her drivers license expired and she did not want to renew it. How can a totally incapacitated person, as Ledakis claims my mother is, cook correctly, drive a car with thousands of decisions made every few minutes, etc? Ledakis refused to let me be there during the meeting. I was not allowed to see, evaluate and fact

check his report as the other lawyers were allowed before the trial. I only saw the report at my former lawyer's office for about 2 hours and I could only take some notes. I was not allowed to see Jaskowiak's and Camp's binders before and after the first trial to review before the day 2 of the trial. The 30 page Ledakis report was a extremely poor and extremely flawed report that would soon ruin the life and happiness of a 96 year old woman and her finances forever. Ledakis admitted, by my questioning, the paper and pencil tests he used had no independent studys that proved they were accurate. He admitted he had no idea how accurate his evaluations were. He admitted there were no standards for any of these so-called "evaluations" to determine if a person was incapacitated. He admitted there were no time amounts that had to be met to be a reliable "evaluation". In other words, my mother and many, many others that are not obvious as being incapacitated, have been falsely labeled and had their lives ruined and finances wasted.

Many times Judge Wilheimer yelled at me during the trial because I challenged someone or asked her why my question was not allowed. I was trying to learn what she wanted and allowed. Instead of having a little sympathy for a person in this extremely serious and emotional trial, she chose to be unprofessional in her conduct. Jaskowiak was told several times by my mother she loved me and only trusted me to help her make decisions. Instead of talking to me to help me in court and promote me to the judge to be a guardian for my mother, Jaskowiak yelled at me and accused me of using Mom only to get her money. The fact is, I have always lived on the money I made. I never got a \$100,000 loan to buy a house like JH got and then had \$25,000 of that loan forgiven like my mother did for JH. Judge Weilheimer REFUSED to let my mother be at the trial to speak for herself, even though the Ledakis report said my mother could be there. Judge Wilheimer refused to let me be the guardian. Before the trial was over, Jaskowiak already had a name for a legal guardian. Nobody told me I should have a name in case I was not chosen. When I asked Judge Weilheimer where do I look for a name, she laughed and said "google it". She gave me only 2 days to get a name, but I could not find one in that time so Logie got it.

It makes no sense why I was not chosen, except for the obvious fact the judge did not like me. I have been at my mother's house for 8.5 years, every day for dinner, about 6 hours every day. About 3 months ago, I moved in so now I am there all the time. If she ever needs more care, I am there, for free.. I have taken care of her car repairs, house repairs, trash, filing, grocery shopping, snow shoveling and many others. My mother trusts me to make her life happy and to make all decisions for hospital and end of life care. Why would the court force her to have a totally unknown person on my 96 year old mother and force us to get his "permission" for almost anything we want or have to do pertaining to various day to day matters.

A week ago, Logie told me a nurse was coming to see my mother on Wednesday. At 11:45, Logie showed up with 2 cops. When I answered the door, I was pulled outside by the cops and Logie went in and shut the door. One of the cops said they were taking my mother away. I became unglued. I kept asking why and where was she going. They refused to say. About 5 minutes later, my sister showed up with a bag and went inside. I kept asking where was she going . About 5 minutes later, a tow truck came and took my mother's car away. Again, the cops refused to say anything. Soon after that, I saw my sister's car drive away with my mother. I was not allowed to hug her and say goodbye. Why? About 10 minutes later, Logie came out. I yelled at him where was my mother going and he said she is going to live with JH. I asked him why the car was towed and he laughed and said it was her property. He walked away and said he was going to send me a email. He and the cops left. His email said Mom was staying at JH and I had to be gone in 30 days, no reason was given. My sister sent me a email that said do not communicate with her or stop by or she will call the police. Why would somebody force my mother to live with my sister after the extremely bizarre and crazy comments my sister made in court claiming I was basically turning into the werewolf as I was supposedly trying to kill her and claimed my mother and I were having a "romantic campaign"? Why am I denied the right to talk and see my mother?

That night, I called the local police to do a wellness check. The next day, a cop called and said he saw Mom and she waived at him. He said he did not talk to her. I was very mad because he should have done so. The next day, I get a email from Camp(JH lawyer) who said to Judge Weilheimer she wanted an emergency meeting on Friday because of what happened. I was scared of what that meant so I called the police again to do a wellness check. The dispatcher was extremely rude and unprofessional and told me she knew who I was, my mother was alright and not to call anymore.

On Friday, there were 5 people on the conference call. All 5 of them made lousy insults against me. I finally had to ask the Judge, "When will I be allowed to respond to their lies, I have a right to do so." She responded I had no rights. I asked her when will I see my mother? She said they are working on visitation. Why do I have to have "visitations"?

What did I do? There are no protection from abuse orders. Why am I not allowed to see my mother or call her? Why is everyone refusing to answer me? During the call, Logie said it takes a while for people to get acclimated to their new location. What does that mean? Why is my mother being forced to live with a person she does not like and my mother has told that to Jaskowiak, Logie and Ledakis. Why is Mom being forced to be with someone who does not like her and tried to steal her money and not repaid back a \$75,000 loan from 12 years ago? Judge Weilheimer told me not to call the police again to do a wellness check. She said if I did, I would be charged with harassment. For caring about my mother?

Judge Del Ricci, I am asking you to see the facts as they are. You must stop this huge mistake. Ledakis did not do any type of "evaluation" that had any credibility. He admitted many facts that proved it was not a credible "evaluation". I do not care how much training he claims he had, only 2 hours of talking to someone and giving some paper and pencil tests, that have no independent studies that prove their accuracy, does not prove anything about a person, especially any part of being incapacitated. Judge Weilheimer refused to let my mother come to court so she could tell the court herself how much she loves me and trusts me to take care of her whenever the time comes. My mother was refused the right to be seen by the Judge so the Judge could see for herself how remarkable my mother is.

Will my mother's health and life continued to be put into the hands of a stranger who does not know her or what she wants or needs? A stranger who does not care about her, only how much he can charge her (\$115 per hour) for anything he can think of? Keep in mind, everything I do for my mother does not cost her a penny. Logie even charges for travel time from and to his house in West Chester, about 55 miles away. In traffic or bad weather, he can charge her hundreds of dollars just in travel time. That is not right and cannot be allowed to be done to my mother. I do not trust him at all because he has lied to me many times and has refused to provide documents to prove his "credentials" and his insurance liability for his type of business for several weeks. I want you to meet my mother and see for yourself that she is not incapacitated. According to the Ledakis report, my mother needs full time day care. That is a lie. My mother can live totally on her own. I have seen her 24 hours a day for 3 months since I moved in so I know. I moved in about 3 months ago after I got rid of my house. Logie told me he is giving me 30 days to move out. Why? Is HE going to tell my mother that he ordered me out and she cannot have her son around even though she wants me there? What is the purpose of that? I started to live there full time until I was ordered to move out by Logie. Why should my mother pay money for people just to sit around doing nothing if I am not there? Once I am gone, is Logie planning to junk all of my mother's loved possessions, sell her house and put her into some strange place and have her live in a 1 room apartment? Or, is he going to put her in a expensive retirement home that will waste her savings when she has a free house now to live in? What is the point of those court decisions? They have no logic or intelligence to them.

About 2 months ago, I was told by my former lawyer my mother was going to be allowed to live in her house. Was that a lie? Will she be told if she is going to be forced out of her house and all of her loved things will be trashed? According to the final decree, Logie is allowed to invest her money in any way. Does that include taking out mortgages and her money he feels like just to see if he can be a "investor"? Legal guardians have too much power that is not constantly under someone else's watch and control. The qualifications to be a guardian are not that many. The children of the "incapacitated" person are basically considered non-existent to a guardian.

Why is the Orphans Court ruining my mother's life now, when it was perfect until my sister started this mess by filing the petition only to get money from my mother and then dropping out because documents would have proven she was a thief? When my sister dropped out, the petition should have been thrown out. Could JH have dropped it or did she continue it knowing I would never be chosen so she could get control of the guardian? It is clear, the court and Logie are forcing my mother, against what she wants, to be living with my sister. The same sister who has refused to send me a email telling me my mother is alright or letting me send my mother any messages for almost a week now.

Is this the Orphans Court idea of claiming it cares about old people by making them miserable and wasting their money?

Sincerely,  
Arthur Herring III

215.960.6229

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

ORPHANS' COURT DIVISION

NO: 2021-X2110

IN RE: JANE T. HERRING

AN ALLEGED INCAPACITATED PERSON

73,

REPLY TO MOTION TO STRIKE FOUR EMERGENCY PETITIONS FILED BY ARTHUR HERRING III  
ON OCTOBER 19 2023 AND TO SUSPEND HIS IN FORMA PAUPERIS PRIVILEGES

1. Admitted in part. Jaskowiak MAY have been appointed by judge weilheimer, but he has NEVER represented Jane as a real lawyer under the PA Rules of Conduct and under Title 20, Section 5521. Jaskowiak actually has 3 responsibilities: he is supposed to protect Jane as a lawyer, protect her wellbeing as a human being and to protect her financial interests. Jaskowiak has NEVER carried out any of those responsibilities for Jane or ever cared about doing them . In fact, Jaskowiak has only acted for his own best financial interests and those of the Racket. To the best of Arthur's information, jaskowiak has only seen and talked to Jane once since he allowed her to be kidnapped and dumped at Jane's current prison, manatawny manor. By jaskowiak responding for the Racket, he has proved such a Racket does exist for the sole purpose of criminal activity, in this case stealing Jane's assets. This includes Jane's house and valuable possessions. But, jaskowiak/Racket also have condemned Jane to spending the rest of her life in solitary confinement, in a sensory deprived environment and slowly stealing her body's physical abilities and her mental abilities, her freedom and her happiness just for their greedy financial enrichment. Only her loved son Arthur has taken extensive time and money for Jane's concerns and needs to be carried out.
2. Admitted in part denied in part. Jane was "claimed" to be "incapacitated" only by a corrupt psychologist, ledakis, using a fake and unreliable "evaluation" that he admitted in court had NO independent proof of accuracy. Ledakis had NO proof that he ever gave that "evaluation" to Jane (for that matter any others he gave to jane) because he admitted he never audio or video recorded Jane's "evaluations". Ledakis cannot even prove his reports only pertain to Jane and not 100 or 1,000 other of his victims using a simple cut and paste of their names. Jane is and has been a victim, as tens of thousands of other elderly people nationwide and worldwide, of fake and corrupt guardianships just for their financial assets for decades. Because of Jane's fake guardianship, Arthur



created a massive news website  
about November 2021.

to expose those scams in

3. Admitted in part, denied in part. Fenstermacher and blumer were appointed as guardians of person and estate, but have refused to act as such for Jane's health, happiness and financial interests in any way, only for their own selfish and greedy needs by using various criminal actions. In reality, to this day, it can be easily and correctly said Jane does not have or ever had any guardians of person or estate based on their gross barbaric and inhumane treatment to Jane. That treatment also includes by her estranged daughter, jsh. Title 20, section 5521 spells out how guardians and guardianship must be carried out. Blumer, jaskowaik and Fenstermacher have REFUSED to follow those rules and laws for Jane's welfare and happiness at her age of 98.5. Fenstermacher, jaskowaik has and blumers massive number of lawyers she hired, including her husband, have always refused to follow the lawyer's Rules of Conduct.
4. Admitted in part, denied in part. For decades, jsh has refused to participate to prove she is actually the biological offspring of Jane and her late husband Arthur Jr, that she might have been accidentally switched at birth in the hospital.
5. Denied. Arthur has been exposing the guardianship scam on Jane, has constantly exposed the corruption on Jane by the Racket, has tried to get Jane back home where the Racket's own, hand picked "expert" ledakis said she could stay and with Arthur there, everything was fine. If not back to her home, only Arthur constantly found much nicer, much bigger and much cheaper places for Jane to live. The Racket has always refused much bigger, much nicer and much cheaper places for Jane, if for some unknown and never given reason that Jane could not go home to where she happily lived for 21 years. Jane's estranged daughter, jsh, put an end to that happy and free life of jane's when jsh tried another method to grab Jane's assets for herself using this guardianship scam. Jsh had tried many times before to take control of jane's life and financial assets before with fenstermacher's help, but Arthur had always stopped them.
6. Admitted in part, denied in part. Lawyers come and go. When Arthur did not see any progress by those attorneys, he dismissed them. Arthur's recent lawyer, Meitner, had to leave for health reasons. Meitner had 55 years of law practice. Lawyers quit all the time with clients.
7. Admitted. Judge weilheimer asked for and got from Arthur financial documents that proved he was not able to use the court, as he and everyone, is allowed to use under the law. Why is jaskowaik concerned about that INSTEAD of the welfare, both health and financial and happiness of his client, 98.5 year old Jane herring? In addition, why hasn't jaskowiak followed the Rules of Conduct for lawyers that he has ignored for the almost 2.5 years as Jane's lawyer? Maybe that is why he gets fired by some of his clients, as he did recently, by a 81 year old woman for gross incompetence after

jaskowaik got tens of thousands of dollars from her and basically did nothing to her case.

8. Admitted. So what?
9. Admitted in part, denied in part. More name calling, slander and demonizing by the Racket and its apparent leader, Jaskowiak. Every citizen and lawyers in the US has the right to file many types of documents in court for legal action. Arthur does not get paid for doing any of it, unlike the corrupt Racket who have only been concerned with either ignoring or creating problems for 98.5 year old Jane, knowing her devoted son Arthur will try to get those problems fixed, as he has done many, many times and thus giving the Racket's many lawyers the ability to create more fake billing hours for their own financial benefit at the expense to Jane's financial assets. In addition, only Arthur, not jsh, logie, blumers, their lawyers, jaskowiak, or klock have ever done anything for the benefit to Jane in any way, especially by Jane's estranged daughter who starved, tortured and tormented Jane to the point where she had to be put on anti depressants the same day she was kidnapped by jsh and logie as part of their "plan" to the Racket. Because of jsh's barbaric and inhumane treatment of jane for 2 weeks, Jane had to be taken to the hospital, unconscious, by ambulance, confined to bed for 6 weeks, was treated for starvation from being locked in at jsh's house for almost 2 weeks, got covid at week 5 where jane could have easily died a painful death, got painful daily blood tests and needles to the stomach to prevent blood clots, about 42 times each. Jane's arms were black and blue from the blood tests. At week 6, logie and jsh dumped Jane into a very low rated nursing home that was recently reopened after several months of a major covid outbreak shut. Within months, Jane got covid again where she could have died again a extremely painful death and several months later there was a outbreak of influenza where Jane got the flu where she could have died again, all because of the financial greed of jsh, logie, jaskowiak, and klock. Jane, even though was so-called declared "incapacitated" because of the refusal of her "lawyer" jaskowiak to defend and protect jane from being falsely accused of being "incapacitated" and condemned to guardianship corruption. About 39% of the people that die from covid, die in nursing homes. Not at any time, has jsh, logie, blumer, jaskowaik, klock or fenstermacher wanted Jane to go back home where she has repeatedly said she wanted to go or to a much nicer, much bigger and much cheaper places for Jane where she would have some of her much loved possessions and be with basically normal people. Only Arthur has constantly demanded that for Jane and at NO cost to Jane.
10. Denied in part, admitted in part. The Racket is extremely scared that if my petitions are ever heard in court, the Racket's guardianship scam of Jane and probably thousands of others would be exposed, those involved would go to prison for many years and their assets would be seized and used to pay back other victims of these corrupt guardianships. If Arthur's petitions are heard, the Racket would have to explain their

gross corruption in this guardianship scam on Jane, a 98.5 year old woman who was living happy, healthy and free BEFORE the Racket took control of Jane. Those 286 paragraphs are all FACTS. The Racket does not like facts because they show the corruption and gross incompetence of those guardians past and present, their lawyers, jaskowaik, jsh, klock and fenstermacher on Jane.

11. Denied. Facts are extremely scary to criminals, in this case to the Racket. If the Racket is so concerned about Jane's finances, they why did they refuse to follow ledakis's facts that Jane could live at home and with Arthur there, everything was fine? The pig pen where Jane has been kept in solitary confinement and in a sensory deprived environment for over 2 years is about \$90,000 a year as compared to the court's accepted cost of Jane's large 3 bedroom, 3 bathroom house in a gated community at only \$16,500 a year. Well, WHO has been and still are really DRAINING jane's assets AND her physical and mental wellbeing? NOT Arthur.
12. Denied. Proof is demanded at trial. That is why Arthur filed his petition for the Racket to PROVE their accusations and claims against Arthur, something the Racket has refused to do for the 2 years Jane has been "owned" by the Racket just for her assets. As Arthur stated in #9, the Racket either creates problems to Jane or ignores problems to her knowing Arthur, with or without lawyers will fight to have those problems fixed because of his love for his Mother, unlike the Racket who only see Jane as their private ATM machine. The Racket depends on Arthur's love for his mother to rack up massive, fake lawyer billing hours, which fenstermacher approves without any proof those billing hours are real and justified, especially to ledakis and his made up "evaluations". .
13. Denied. Why is jaskowaik worried that Arthur is not paying filing fees? Weilheimer asked for and received from Arthur proof Arthur was poor and was entitled to that ability. Arthur has been forced to live in his small car for the past 2.5 months because fenstermacher and the Racket REFUSE to do what Jane has said and put into writing that she wants Arthur to live in the house for free. Arthur has to live in his car because fenstermacher also refuses to do what Jane had done and continues to do for 10 years, which is give each child \$14,000 each year instead of presents. Fenstermacher has refused to reply to Arthur about this for about 3 months. Fenstermacher has ignored his responsibilities and obligations, as does blumer, as guardians of Jane. With guardians like them, who needs enemies? LOL. Jaskowiak IGNORES the other costs to file petitions and reply to court documents, including gas to go to the court house, parking fees, xeroxing at 35 cents a page, gas to get them xeroxed. Plus, Arthur has to pay for gas and parking fees when ALL matters are brought to court by the Racket. Unlike the shisters, guardians and their shisters who get extreme fees for their time to come to and be in court, Arthur does NOT get paid for his time. Arthur has only been fighting to get his Mother home at age 98.5 or to a much bigger, much nicer and much cheaper place for her to live, be happy, live free and live like a human being, not as a caged animal, as jsh,

guardians, their sisters, Klock, Fenstermacher and Jaskowak have forced Jane to live as under their "ownership". All the while stealing her money for themselves and pretending to be Jane's "guardians" and "lawyer". Arthur is demanding the removal of all the people that were hired, with and without the court's approval, because of their gross incompetence, corruption and gross neglect endangering the health, welfare, happiness, freedom and future finances of Jane in case she needs it for possible future medical needs that are not covered by insurance. It is believed the cost of the tiny room of Jane's, in that locked down section with people with mental and behavior problems, where Jane has not been allowed into society or outside for 2 years, is about \$90,000 a year, as compared to the court's accepted cost in 2022 of Jane's home of only \$16,500 a year for her large 3 bedroom, 3 bathroom house in a gated community. Jane and Arthur had agreed after Jane's husband had died that if Jane ever had any medical problems or special needs (that even the Rackets hand picked quack Ledakis said she did NOT have with his first "evaluation" of Jane and Ledakis said with Arthur there everything was fine) any day care or more needed for Jane, the hired help could use or live in Jane's late husband's full bedroom and bath. As for all people, living at home with their loved possessions, is far more beneficial and much less stressful on a person than in a hospital room, with probably another strange room mate.

14. Denied. Outragous! More demonizing and more slander by the Racket. The Racket's fake and fraudulent guardianship of Jane has been the REAL drain on the court business, NOT the attempts by Arthur to seek justice for his Mother and to stop the barbaric, inhumane and financial theft to Jane, at 98.5 years old, for the past 2 years. It is normal for criminals to blame everybody else for the crimes they have committed i.e. blame drugs, blame alcohol, etc. How slimy can the Racket be for ignoring how they slander people with here say for the past 2 years claiming the never named and never brought into court "staff" who the Racket uses to continue to claim Arthur "agitated" his Mother without ever asking Jane if he did? Jane NEVER refused Arthur's visits or his twice a day phone calls before Blumer canceled them for no reason in about June 2022. Plus, even though the staff was told first by Logie, then Pam Blumer, to listen in on Jane's phone calls with Arthur and listen at the door when Arthur was there and were told by Logie and later Blumer that if Arthur ever got Jane "agitated", they could tell him to leave. The staff NEVER had to tell Arthur to leave. In addition to all of that, after Blumer told Arthur and Jane that they had to sit in the TV room when they ate lunch, instead of in Jane's tiny cage as they had been doing since Jane was dumped there by Logie, Racket and Jsh, the staff was told again if Arthur ever got Jane "agitated", they could tell Arthur to leave. The staff NEVER told Arthur to leave. ON TOP OF ALL OF THAT, even with 2 of Blumer's and the Racket's paid liars (monitors) sitting only about 3 feet from Jane and Arthur, who were also told they could tell Arthur to leave if he got Jane "agitated", those monitors also NEVER had to tell Arthur to leave. In fact, in a zoom call with the first

“monitor”, brandi (if that is her real name) and the Racket and weilheimer refusing to let Arthur’s former lawyer and Arthur know the qualifications of this person to be used as a court “expert” to accurately listen, accurately take notes, accurately make quotes, while continuing to listen, etc) on that zoom call, brandi admitted all of the visits of Jane and Arthur were loving and happy. WHAT MORE DOES THE RACKET WANT OR NEED TO STOP THEIR SLANDER AND DEMONIZING OF ARTHUR? At this same hearing jaskowiak refers to in this paragraph, Arthur knows that the ONLY real purpose of these fake “monitors” is only to make up lies in their reports so Arthur’s visits will be banned until Jane dies. Exactly what jaskowaik has wanted since the beginning because of his hate for Arthur because he has been exposing the scam. Arthur did not visit his Mother for 4 months because he knew that was the Racket’s plan since these fake monitors were hired by blumer and costing Jane/Arthur money that there was no cause for. Arthur and Jane had tremendous sadness and pain not to be able to see each other at Jane’s advanced age and be denied the normal abilities that Arthur and Jane had to be together and enjoy life’s happiness. Based on 16 hour days (8 hours for sleeping) from august 25 2021 (when Jane was kidnapped by jsh and logie) to Nov 1 2023, out of a possible 13,216 hours Jane and Arthur could have been together, they were only allowed by weilheimer and Racket 217 hours. Is the Racket proud of their barbaric and inhumane treatment to a 98.5 year old woman?

It MUST be mentioned, that Arthur begged the court for him to have a way to protect himself from these lies by the fake “monitor’s”. Jaskowiak, gelsinger and the court refused to give Arthur such ability to protect himself from those lies. Why?

15. Denied in part, admitted in part. BS! Arthur has explained the methods the Racket and others like it nationwide use to make their money from these guardianship scams in this petition. Arthur has many exhibits, much more information for the hearing on this matter and in his petitions. If the guardians, their shisters, jaskowaik, jsh, klock and fenstermacher did their jobs for the benefit to Jane and her health, wellness, happiness and financial protection, then NONE of these proceedings would exist. Only the Racket financially benefits from their gross incompetence and corruption. THEY are the REAL reason Jane’s assets are being depleted.
16. Denied. Justice delayed, is justice denied. If the Racket, who gets paid a lot of money to take care of their slaves that they own, did their job, none of these petitions or court hearings would be necessary. Arthurs constant attempts to protect his Mother from this scam are only to benefit Jane, unlike the Racket’s purpose which is to use Jane to steal money from her and only use Jane as their private ATM machine.
17. Denied. Outrageous for jaskowaik to even attempt to deny Arthur his constitutional rights of using the courts for legitimate purposes, in this case to protect his 98.5 year old mother from the scam jaskowaik and the Racket are in charge of and using to steal jane’s assets, including her \$500,000 house and its valuable antiques.. Arthur had and

continues to prove he is basically existing on extremely limited funds and has been forced to live in his car for the past 2.5 months since he obeyed weilheimer's order to vacate without any action by law enforcement needed to evict Arthur on August 25 2023. It was fenstermacher and jaskowiak who refused to be there to get the keys and to verify Arthur never damaged Jane's house in any way and did not remove any of Jane's valuable possessions. It has been fenstermacher who has refused to do his duty as a lawyer and as the guardian of estate to serve Jane and protect her from the blatant theft of her funds, soon her house and all of her loved possessions of 98 years just for their own financial gains. It has been fenstermacher, jaskowiak and the others in the Racket who have REFUSED to serve Jane and carry out her wants and wishes. It has been fenstermacher who has refused to reply to any of Arthur's emails from the past 3 months, including giving Arthur his yearly gift money from his mother of \$14,000 (new legal limit is \$16,000) a year that Jane has given her children for the past 10 years, including by fenstermacher for the past 2 years, because Jane has been a prisoner at the nursing home and is not allowed access to her OWN money. No reason given by fenstermacher for not obeying Title 20, Section 5521. Fenstermacher and the Racket have deliberately conspired to punish Arthur and put him to the curb for exposing their guardianship scams on Jane and hundreds, maybe thousands, of other victims who have assets and houses. Fenstermacher admitted in court back in about February 2023, that he has not seen or talked to Jane for 2,5 years. Has fenstermacher forgotten the Pennsylvania Rules of conduct for lawyers?

18. Denied. Outrageous. Has jaskowiak elected himself to be in charge of the Racket, the spokesperson for it and also as a judge? Does jaskowiak also think HE should decide what petitions should be filed and which ones should not be? Does he believe that criminals should decide what evidence the prosecutor can use against them for trial? I thought only a judge can decide what is relevant or not. Jaskowiak seems to be using the same tactic judge weilheimer used about 4 months ago who had the county IT person block my email address to her office AND all county agencies, politicians, sheriff, DA and elder agencies to deny me the use of them for legal proceedings. Manipulating information is fixing a case, fixing a case is corruption and that is a felony. Weilheimer also blocked my access to my court docket to see my documents. Jaskowiak should spend more time trying to get results for his clients to make them happy and for THEIR benefit. If he did, he would not be fired by his clients, as he was recently for taking tens of thousands of dollars from a 81 year old mother, over several years, who has been trying to get her mid 50's daughter back who the mother had not seen for 12 years. This is the same jaskowiak who bragged at a legal seminar in October 2019 that he uses contempt of court to get his way by putting people into prison and to make money from doing it, as jaskowiak had done to me twice and got about \$5,000 each time on made up charges. Jaskowiak seems to believe prison is another name for a country club.

Jaskowiak has proven to be so evil and obsessed for money that he is willing to put people into prison where they could be murdered. In my case, it would have been depriving my 98 year old mother from her much loved son forever. Is THAT what jaskowiak thinks being a lawyer is about: ignoring the law and the Rules of Conduct for a lawyer just to get money? Jaskowaik is also the same person who refused to bring in any of the professionals that Jane dealt with every year to prove she did not need to be guardianized. The fact is, Jaskowaik WANTED Jane to be guardianized for Jane's assets for himself and the Racket. Jaskowiak also wants prison time if I exercise my constitutional right to use the court. This is why there is a disciplinary board for lawyers who think a law degree means they can make up their own laws and rules.

In his conclusion, jaskowiak wants again to ban Jane, his supposed client, from ever seeing her son again. Who is jaskowiak's client: Jane or Jaskowiak and the Racket? Jaskowaik and the Racket. Who is jaskowiak serving: Jane or Jaskowiak and the Racket. Jaskowaik and the Racket. As of this date, Jaskowaik and the Racket have totally ignored the basis of U.S. law: A person is INNOCENT until proven guilty in a court of law and a person has the RIGHT to face their accuser. Here say is NOT evidence. But, the Racket likes to use here say as their "evidence". As Arthur said in his last petition: PROVE, with FACTS, not here say or from a paid liar hired by the Racket, Arthur is either a menace or danger to Jane as the Racket has been implying for the past 2 years using only here say, in other words, either defecate or get off the toilet. My Mother had NO physical, medical, mental or financial problems BEFORE jsh started this scam for Jane's assets and to own her Mother as her slave. Jsh dropped out before the petition hearing only because of evidence Arthur had proving jsh had been trying to take control of Jane's assets and Jane herself, with the help of fenstermacher, since Jane's husband died years earlier. The Racket then took over for jsh and for themselves, like vultures, to pick every once of meat from Jane's bones: her assets.

Why doesn't jaskowaik and the Racket first do what their hand picked "expert" ledakis, said in his first "evaluation": Jane stays at home and with Arthur there everything is fine? The Racket and the court hired ledakis 2 more times after that at Jane's expense. If they did not think he was any good, why did they hire ledakis 2 more times?

Jaskowiak and the Racket: Either put up or shut up in a court of law. PROVE YOUR CASE with FACTS, not here say. Jane is your FIRST and only FACT to be used to decide if Arthur cannot be with Jane for normal, daily meetings to go anyplace, do anything, including going home so Jane can live like a free, normal human being, NOT as a convicted criminal or a mentally dangerous person. About February 2023, weilheimer praised jsh as a nice person and removed all limits on jsh's time and visits with Jane. Did weilheimer forget or not know what torture and torment jsh put her Mother through

for 2 weeks that put Jane into the hospital for 6 weeks and confined to bed from starvation at jsh's doing? As all the lawyers know, weilheimer threatened Arthur with contempt of court (at day 3 after the kidnapping of Jane) in a group conference call if he ever called for a second wellness check on Jane after Jane was kidnapped by jsh and logie. Why would she threaten Arthur with prison because of what happened to his then 96 year old Mother and Arthur only wanted to make sure his mother was alright. Jsh had denied Jane to leave or to call Arthur for those 2 weeks. Why? Jsh had threatened Arthur with arrest if he showed up to see his mother.

The Racket's motive has been only financial greed for themselves from day one of this guardianship scam at Jane's expense: her health, happiness, financial and freedom. The Racket has attacked Arthur in the most vicious ways to deny him to be with his mother because he dared to expose their scam on Jane and for trying to stop them from stealing Jane's assets.

Many exhibits will be introduced at the hearing for those petitions and for this response.

Submitted,

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Rev. Arthur Herring III, pro se

258 N. West End bl. #153  
Quakertown, PA 18951  
215.960.4447

Date: November 1 2023



IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

ORPHANS COURT DIVISION

NO: 2021-X2110

IN RE: JANE T. HERRING

A FALSELY ACCUSED ELDERLY PERSON OF INCAPACITATION BY THE GUARDIANSHIP MAFIA  
FOR HER ASSETS AND HOUSE

4/22/24

78.

REPLY TO REPLY AND NEW MATTER OF JANE T. HERRING TO THE 'ANSWER' OF REV. ARTHUR HERRING III  
TO THE COURT'S ORDER OF APRIL 3 2024

1. Agreed.
2. Denied. The court gave its Order BEFORE I was able to submit my Reply to jaskowiak's filing. I submitted my Reply so not to allow jaskowiak's response to go unanswered. In addition, at the March 20 2024 hearing, the court refused to allow me to give my closing argument, I was not allowed to question jaskowiak, fenstermacher or gelsinger pertaining to my petitions of them to prove my points to have them removed. Instead of jaskowiak worrying about the lack of legal abilities of a person pro se, jaskowiak must start to dedicate his efforts and attention to the health and welfare of his client, Jane Herring, age 99, that he has totally ignored for the past 3 years according to the Rules of Conduct for lawyers. Rules that jaskowiak has decided do not apply to him because HE is above laws and rules. He refused to defend Mother in court against being guardianized because he WANTED Mother to be guardianized for her vast assets and house for the guardianship mafia that he has been a long time member. Court transcripts proved jaskowiak had no desire to defend Mother. To this day, Mother never had legal representation. Someday, Jaskowiak will learn the courts are for ALL the people, no matter their lack of legal grammar and wording, to present their arguments and information the best way they can. It's the evidence, stupid!

Jaskowiak has switched from numbered to narrative format as I will continue to do.

The court must ask jaskowiak WHEN will he represent Jane as her lawyer, his client since May 2021, for her wishes, wants and to be included in ALL matters that pertain to her as she is entitled to under the laws of Pennsylvania and the United States pertaining to guardianship and as a disabled person? The questions must be asked:

1. How is Jane Herring better off now mentally, medically, physically, financially and her happiness since jaskowiak became her lawyer? The answer is: NOT AT ALL!

2. Has jaskowiak fulfilled his obligations under the PA Rules of Conduct for lawyers to Mother?

The answer is NOT AT ALL!

Jaskowiak constantly says in his titles that he is responding for Mother, which is a total lie. Jaskowiak has only seen Mother twice in 2.5 years since she was dumped into her present pig pen, kept as a prisoner, in solitary confinement, in a sensory deprived environment, basically no usable TV channels, no phone, no reading materials, no visitors allowed and not allowed outside into society for 2.5 years and not allowed back to her home to enjoy her loved possessions. Why? Mother has never been claimed to have any mental or behavior problems that would make her a threat or danger to herself or others. It must be asked: What is the difference between having jaskowiak as your lawyer and not having a lawyer? None!

On the March 20 2024 hearing for contempt and other matters, basically none of them was I able to present my cases, I exposed the corruption of jaskowiak/mafia with their paid liars. I proved jaskowiak and

the other guardians and their lawyers in this mafia had told their "monitors" to lie about me to use those lies to reduce, restrict and to deny me visits with my Mother because I was exposing the vast corruption of guardianship in the orphans courts throughout Pennsylvania and I was a serious threat to the income of those corrupt judges, guardians, lawyers and psychologists. Mary ellen, the recent paid off "whore" admitted under oath that she (including brandi) had no training to listen accurately, make notes accurately, make quotes accurately, while continuing to listen, etc. Therefore, the notes she made falsely accusing me of saying and doing things had NO repeat NO accuracy. It must also be remembered, the former judge in the case weilheimer, jaskowiak, blumer, her lawyers, fenstermacher and now Sterling refused to use a simple, free, cell phone to record the visits and would not have cost Mother or I any money. Cell phones do not lie for people, paid "whores" do. I also proved mary ellen lied, as the mafia told her to do and say I was using my cell phone to record Mother during a visit. Jaskowiak stated I did as a fact in his pleadings. He knew it was a lie. jaskowiak is guilty of perjury as a officer of the court, mary ellen is guilty of perjury, both are guilty of putting false evidence into court. Jaskowiak was trying to put me into prison based on her testimony. I proved mary ellen could not have been able to know if I was videotaping Mother or if I was looking at the time, getting a phone call or getting a text. Jaskowiak, mafia and the court's case blew up in their faces. As of today's date, Ms. Sterling has not done anything as punishment to jaskowiak or mary ellen or brandi for lying and committing perjury. Weilheimer gave me permission to take pictures of my Mother. By the way, did anyone ask my Mother if she cared if I videotaped her? By law, she has the right to say what she wants and to make decisions in her guardianship, but for 2.5 years, except for her bank account, nobody cared about her health, welfare and happiness.

Since I proved very recently in court that the court, jaskowiak and the guardians picks as monitors are just paid off liars, why would anyone think I will deliberately screw myself a third time by going along with their trap and without a cell phone to protect myself? I demanded a cell phone to be used in a September 2023 hearing to protect myself, but jaskowiak, gelsinger and court said no, for obvious reasons for their own financial benefit. I knew I was being set up by the mafia to ban me from seeing Mother when those paid whores were first started, but I wanted to see my Mother. Again, why wasn't Mother there as she has the right to be? Answer: If my Mother was in those court proceedings, she would demand things not be done and other things done for her, including going back home where the court's other paid off whore, ledakis, said she could stay and with me there, he said everything was going fine.

According to U.S. law, a person is innocent until proven guilty in a court of law and a person has the right to face their accusers. The mafia and the court do not care about the law, only money. For 2.5 years, I was accused by the jaskowiak/mafia, courts, guardians, their lawyers of agitating my mother by my phone calls and visits. I was also accused of making her legs swollen by the food I was bringing her, the same food she ate at home. Mother never did and still has no food allergies and no diet restrictions. The fact is, only I was the one who called the paramedics because I saw her legs swollen 2 days after they were because nobody else would. They became swollen only 1 month after Mother was dumped at the pig pen. The fact Mother's only exercise is walking 35 feet from her room to eat and back again to just sit in a chair or in bed. None of the mafia ever filed a petition to prove their claims. When I filed my petition in September 2023 for the jaskowiak/mafia to prove their claims, they begged Ms. Sterling to deny my petition because the mafia knew they NEVER had any evidence. Ms. Sterling did what they asked and denied my petition. So, from now on, anytime the mafia says I said or did something, it will always be taken as a fact and no trial? Really? I made my position clear to Ellis weeks ago that I will not allow myself to be slandered, libeled and falsely accused in another fake set up, even at the expense of not seeing my Mother.

Again, why didn't weilheimer, jaskowiak/mafia and this court ever ask Mother if I caused her to be upset?

I demand to know since I was never charged, let alone, convicted of any wrongdoing pertaining to Mother's health, welfare and happiness after 2.5 years, why was or is any monitor needed? Especially, after I exposed the illegal monitor scam by the courts and the guardianship mafia. Why was my sister praised by weilheimer in February 2023 and given unlimited visits and time, when she kidnaped Mother against her will, drugged her to keep her quiet, starved her, refused to let mother leave, refused to let Mother call me or see me and after 2 weeks, Mother had to be taken to the hospital, unconscious, by ambulance, confined to bed for 6 weeks, 42 blood tests, 42 needles in the stomach, got covid where she could have died and then dumped into her current pig pen where she got covid again, influenza, falls on the slippery floors and has been severely injured. Even today, there are still many active cases of covid. But, I am forced to pay or have paid liars to sit with Mother and I and they/mafia violate our rights of privacy and freedom of speech. Neither weilheimer, Sterling or jaskowiak/mafia has ever wanted Mother to leave that pig pen and go back home. Why? The federal and state laws demand such arrangements for the health, welfare and happiness of the person, plus the massive financial benefits to Mother living back home, with her loved possessions and to live in society again that will allow her to be physically and cognitive far, far more active. I challenge the court, jaskowiak/mafia to try to justify their ongoing barbaric and inhumane treatment to Mother of 99 years old for the past 2.5 years.

Jaskowiak mocks my insistence that Mother should go back home instead of staying in that pig pen she has been forced to live for the past 2.5 years. Jaskowiak thinks Mother should die there, while he and the others in the mafia fatten themselves up on Mother's assets. Mother has a large 3 bedroom, 3 bath house and there is a empty bed and bath for any day worker. I would be there to help mother and help her relearn any skills. Mother has nothing to do during the day for cognitive activity, as compared to when she was living at home, doing everyday things. Jaskowiak has been Mother's lawyer for 2.5 years and was appointed to her by weilheimer. But, Mother was allowed to have her own lawyer of her choice. But, why does HE want her to stay there? How much is that pig pen paying him, jsh and others in the past to keep her there? Why did Logie put her there in the first place? No one, including Mother's own daughter, ever brought in anyone, especially the people Mother dealt with every year, including her primary doctor of 20 years, to say Mother had such severe problems she needed to be locked up until she died. So, why IS Mother kept in solitary confinement, in a sensory deprived environment, no phone, no contact with the outside world for 2.5 years? Why is there NO court transcript mentioning that? Jaskowiak claims I don't understand Mother's condition. HE is the one who pretends Mother is beyond help and must be kept away from society. Why? When mother was kidnapped by her daughter and dumped into her pig pen, she had just recently stopped driving her car. Her primary doctor of 20 years never said she should stop driving and she saw Mother one month after jsh filed her petition.

Now we come to jaskowiak's worst nightmare: his neighbors, wife and family finding out he is not a good lawyer, only a 2 bit crook, using lawyer tactics to scam old people from their money and homes and to keep people, as dogs, tied to a tree until they die. The newsletter that was given out free contained information about guardianship corruption and the location of my massive news website about guardianship corruption that is statewide, nationwide and worldwide. The orphans court in Norristown has a decades long history of corruption involving guardianships involving corrupt judges, corrupt guardians, corrupt lawyers and corrupt psychologists falsely claiming, using fake, inaccurate "evaluations", that people are "incapacitated" and must have "guardians" and must be kept in nursing homes until death. In the meantime, those corrupt judges, corrupt guardians, corrupt lawyers, their friends and corrupt psychologists bleed those victim's bank accounts dry and deny visits to their families. Jaskowiak claims, like he always had about other things but without any proof, that I was trying to install fear to those neighbors. To the contrary, I was educating them about what could happen to their parents, loved ones or to them

someday. Prevention is NOT creating fear. In addition, I contacted the local police and they had never heard of me, as opposed to what jaskowiak claims is his document. My contact information was also included in the news letter, but no one has contacted me to complain. Freedom of the press is a right under the U.S. Constitution. Jaskowiak might want to read it someday. No fear, so no foul.

Jaskowiak has proven by his documents, for 2.5 years, after I proved I was not going to be a part of this mafia (unlike sister jsh) and help the mafia and myself to my Mothers assets, that I am the enemy to the mafia. He has also proven he is just a drama queen, a bratty child who bullies any one who does not bow down to him. As a matter of fact, in a 3 hour legal seminar he was in 2019, he brags that he uses contempt of court to get his way, puts people in prison if they refuse to do what he wants, while he makes money from them being this bully. Jaskowiak goes on to mock me being a minister and simply using a stage name on a radio show for the past 2 years. So what? I practice my religion as a minister. Jaskowiak should try being a honest and ethical lawyer. Jaskowiak seems unhinged at my telling people what forces they are up against when dealing with people involved in guardianship corruption and trying to get their loved ones home. It will be a fight that almost all people will lose and never be able to get their loved ones out of this scam. Jaskowiak concludes that my grievances are not in Mother's best interest. How dare him try to justify his/mafia's human trafficking of mother, the unlimited theft of Mother's assets, keeping Mother imprisoned in a low rated nursing home, under the mafia's control until she dies is in any way justified and in Mother's "best interests". Sick and disgusting. No wonder jaskowiak is afraid of his neighbors finding out who he really is.

#### NEW MATTER

I find it repulsive, mentally and criminally sick that jaskowiak/mafia think they are helping and being kind to Mother in any way by giving her something from her home. On the contrary, for 2.5 years, jaskowiak/mafia have been murdering Mother mentally and physically by keeping her, as a dog, tied to a tree and denying Mother her federal and state rights under the law AND denying Mother a lawyer who is dedicated to his client, unlike jaskowiak who has only seen Mother as his whore and he is her pimp. Jaskowiak has only seen Mother twice in 2.5 years and refuses to give her a phone so she can call him when she needs to talk to him. What kind of a lawyer is that? Compare jaskowiak's treatment of Mother to the PA Rules of Conduct for lawyers. Why dis Ms. Sterling say recently in a order that she thinks jaskowiak has done a great job for Mother. Ms. Sterling: WHAT did jaskowiak ever do for Mother?

As per jaskowiak's demands:

1. Why doesn't jaskowik SOLVE the problem of visitation? Jaskowiak/mafia/courts have always refused to charge Arthur with a grievance against Mother? Remember the basis of U.S. law: Innocent until proven guilty in a court of law. Since jaskowiak/mafia have refused to file any such claim against me and jaskowiak/mafia/courts have denied my petition for them to prove any such accusation, then my slate is clean. Recently, I proved jaskowiak/mafia's paid liars(monitors) admitted they were being paid to make up lies about me to reduce then deny my visits with Mother and were demanding money from me and Mother or there would be no visits. Therefor, there is NO reason why my visits have to be watched, paid for, restricted or limited in any way, while my sister, jsh, was given unlimited visits and time with my Mother AFTER what jsh had done to her own Mother in august 2021 by kidnapping Mother and putting her through 2 weeks of drugging and torment that put mother into the hospital for 6 weeks, confined to bed and treated for starvation.
2. No. As I told Ellis last week, I will not be stupid enough to be a victim for the third time of another monitor scam. Jaskowiak/mafia/court have refused to charge me with a grievance and they refused my demand they do so to prove their accusations they have used for 2.5 years which amount to liable,

slander and defamation of character. Several months ago, I had to send out Cease and desist letters to all of them to stop them from using my name in such lies.

3. Denied. I have the right to use the court for any legitimate purpose. As pro se, if I do make legal mistakes or do not use correct words or writings, then I am sure after 41 years of lie detection testing and training worldwide, my points are well made and factual. These proceedings are not a high school book report and grammar is important. Maybe someday, some lawyers will write the basics of filings and responding to them in plain English so those filings will be to the lawyers liking. By the way, are these matters law school classes or about a 99 year old woman's life, health and happiness that have been totally ignored for the past 2.5 years by jaskowiak/mafia/court?
4. Agreed. From now on, starting with this next hearing, Mother will be always be there at all hearings since by law she is allowed to be a part of all legal proceedings. Let's see what SHE has to say, what she wants and demands in her guardianship, including if she wants me to have her house to live in again and my \$14,000 a year gift money. When she is at hearings, she will be drug free for at least 48 hours. Go ahead, make my day!
5. Denied in part. I demand to be there since this mafia was created for the sole purpose of lying, cheating, stealing and human trafficking. I want to see what is being taken that is supposed to be for Mother's benefit. I have taken over 2,000 pictures of every object, furniture, glass, rugs, etc in Mother's house before I left. As my emails to fenstermacher and jaskowiak prove, I sent them several emails for them to come to the house to verify, as per weilheimers order, that I did not take anything or damage the house. Neither of them ever replied to those emails. After 2.5 years of being held prisoner, what could possibly be taken to make Mother happy or for her personal use? The fact is the massive cost of guardians, their travel time, etc are a waste to Mother's assets, but for some reason jaskowiak/mafia/court only thinks I waste Mother's money, not them refusing to solve problems I find that affect Mother's health, life and happiness. The facts and actions of jaskowiak/mafia/court for the past 3 years speak for themselves pertaining to their honesty with access to people's assets. Foxes in charge of the chicken coop?

Submitted,

Rev. Arthur herring III  
258 N. west End Bl. #153  
Quakertown, PA 18951  
215.960.4447  
Tomlinher1925@tutanota.com

April 29 2024

Carrols "report" was only based on a one hour observation and guesswork using paper and pencil tests.

Mom signed documents in 2020 with fenstrmacher. Those documents have never been considered invalid and Fenstermacher never demanded or gave my mother any types of tests to see if she knew what she was doing.

Mom life is totally well managed with auto pay of her monthly bills , RJ investing her money, AH seeing her everyday for 8.5 years and AH doing various duties for her in and outside of house and car maintainence.

Mom has a housekeeper once a month for 2 hours to clean and vacume. I handle other inside cleaning, including dusting, polish floors, etc.

Mom normally only writes one check a month to housekeeper for \$90. Maybe another one to a church once every 2 or 3 months for about \$20 as a donation.

Mom normally uses her debit card only once a week for her hairdresser. Sometimes she gives it to me to pay for gas in her car or for groceries. Usually I pay for the groceries or other house type items.

Alzheimers/ dementia can only be determined after a person is dead. No paper & pencil test, medical test, brain scan, etc can determine that while they are alive or how any type of memory impairment, of any degree, affects a person in their daily life, especially using paper and paper tests that have no independent accuracy study that would prove any such conclusion.

Fravel changes must be kept because Fenstermacher had many errors in his documents, will, trust, deed, etc

Psychologist/psychiatrists only give their extremely limited opinion without any medical tests given and only spend a extremely short and limited time with a patient..

So far, neither psychologist have asked any types of questions that deal with common sense or knowing right from wrong.

Everybody forgets to some degree at different times. People have "brain freezes", stutter, lose their train of thought, etc. Nobody says they have "cognitive impairment".

People, including lawyers, make notes so they will not forget.

None of the verbal or paper and pencil type tests used so far on mom have any independent accuracy studies proving they or any combination of them will give an accurate diagnosis of a person. They can be downloaded from the internet. Danger of that is the same as fake lie detectors being used.

Nobody's giving me answers per financial information. They refuse to accept new legal documents.

Year or so ago in fenstrmacher's office, the 4 of us talked to Fenstermacher. Mom and I gave him her updated will to be made including, 75/25, etc. Did Fenstermacher ever make it?

What has happened in past month (2 months, 3 months, etc) that demanded this serious action?

At no time did jh ever discuss such a serious matter with mom and/or myself. Why?

Mini mental test given by carroll: 21/30. Carroll says 21 is severely impaired; same test by kuhar a month later 26/30 same as last year.

So called "tests" have NO objectivity, ONLY subjectivity. No established and proven standards to determine "impairment". Why do those therapists hide their interviews, their questions and tests? Why no tape recordings of what paciant said and how they said it? NO proof of that.

Expungement of haller charge and shoplifting could have been done, but I did not want to waste the money on lawyer fees.

Pictures are worth a thousand words.

Fravel said a "third party" had contacted him and he decided he did not want mom and me as clients. Who was that?

"In my opinion" and "probably" are NOT facts. EVERY court case is based on FACTS!

Where's the beef? What is ONE example that shows my mother did something that demanded a LG at THIS time?

Getting a ticket before they actually do violate the law

Asset forfeiture

Are those therapist time travelers? Can they go back in time and say that mom was not capable at that time as a fact or are they just guessing?

Judge froze mom's checking account could not save my house

Takes only one sibling to start problems, not two

Reverend Arthur Herring III  
258 N. West End Bl. #153  
Quakertown, PA 18951

80,

February 2, 2024

Re: Cease and Desist from false accusations and demonizing

Mr. Jaskowiak,

Since this guardianship scam and fraud began on my Mother, Jane Herring, in May 2021, you, Judge Weilheimer, various guardians, their lawyers, their paid off "monitors" and Ms. Jill Herring, began and have continued a campaign of vicious lies in writings and verbal attacks on me and my good name. Those various lies by this orphan court "Mafia", included I "agitate" my Mother and I caused her legs to be and stay swollen because of food that I used to bring her. Those lies have been used to demonize me, blacken my good name, tarnish my clean image as a loving and caring son to my Mother, has been used to put me into prison twice and those lies have been used to drain my savings in various ways.

The Mafia continues to refuse to reveal the qualifications of their paid liars to do what they have been told to do as "monitors": make up lies about me to be used against me, mainly to reduce and drastically restrict my visits with my Mother and her with me. The never named "staff", in the nursing home, and their never proven accusations involving me, have also been used to demonize me and to cause me various costly, legal issues. But, this Mafia continues to refuse me any means to prove what I did or did not say or do in my visits with Mother. As I have made clear many times in court, a free and non-intrusive cell phone can be used for my protection and prove any violations by me. The Mafia again continues to refuse such a simple and free way of solving this and other issues. It is very clear the Mafia refuses cell phones because they cannot be paid off and cannot lie for the Mafia, not as they claim that it would violate Mother's privacy. The Mafia violated her right of privacy when they dragged her away from her house to be their property and their bank account.

Recently, I filed a petition for the Mafia to either prove their accusations or "Get off of the toilet". But, you demanded Judge Sterling deny my petition to be heard. As you wanted her to do, Judge Sterling denied me my right to be heard and to prove my case. Every lawyer knows the basis of U.S. law is a person is innocent until proven guilty in a court of law and a person has the right to face their accusers. The Mafia has refused to obey U.S. law because they know they cannot prove any of their vicious lies about me by them and by others. Those various lies have been used to punish me and my 99 year old mother financially and emotionally by using the visit numbers, the length of visits and the scope of those visits as a source of barbaric and inhumane punishment to both her and me only because I have been exposing this guardianship money scam and the people involved from the beginning. The Mafia believes Mother is property to use only as their "whore", to make them money. The Mafia has broken countless laws and rules pertaining to guardianship and giving the victim the right to live where they want, how they want and deciding how the guardians and guardianship is to be operating. Essentially, being able to live free and enjoy life as a human being in society.

The barbaric and inhumane treatment to my Mother by this "Mafia" for the past two years have caused tremendous physical, mental and emotional stress and pain to her, to her happiness, to her medical and mental health and to her finances. Mother is now almost 99 years old. This "Mafia" has been content to force Mother, their client, to live in a tiny room, locked in solitary confinement, in a sensory deprived environment and with less privileges than POW's have under the Geneva Convention and less privileges than people in prison have for various crimes.



Those lies and others by this "Mafia" about me and this scam have cost me a great deal of money, a house and several years of my time spending every day trying to protect and defend my Mother from this "Mafia" and to get her back home where she lived happy, healthy and without any problems.

Therefor, I demand that you and the others of this Mafia cease and desist all current and future use of those lies and any others about me, now or in the future, whether verbally or in any writings by using my identity to enrich yourselves. Since no evidence of fact has ever been presented to verify those lies against me by any members in this Mafia, that constitutes a false narrative and is also called liable and defamation of character. If you refuse to do, after receiving this letter, I will have no choice but to take further legal action.  
Sincerely,

Rev. Arthur Herring III

ORPHANS' COURT DIVISION

NO: 2021-X2110

IN RE: JANE T. HERRING

AN ALLEDGED INCAPACITATED PERSON

EMERGENCY RESPONSE TO PETITION FOR EVICTION

Petitioner, Arthur Herring, III, pro se Petitioner (hereinafter referred to as  
"Arthur") files this RESPONSE TO PETITION FOR EVICTION

1. That this Orphans' Court has jurisdiction and venue over the matter of Jane Herring and the Petition Hearing pursuant to 20 Pa.C.S.A. Section 5512.2 and Orphans Court Rule 14.9.
2. The Petitioner is Arthur Herring, III, age 69, presently retired, who resides at 26 Chancery Court, Souderton, Montgomery County, Pennsylvania 18964, and he is the son of Jane Herring ("Jane") as well as a resident of the real property at 26 Chancery Court for approximately two (2) years, where he resided with his mother, Jane Herring.
3. Jane Herring was adjudicated by the Orphans Court of Montgomery County to be incapacitated on August 11, 2021.
4. Jane Herring is currently a 98 year old widow, with two adult children: her very much loved son to her, Arthur (age 69), and a daughter, jsh (age 72).

5. The court is aware Arthur has been on welfare for over a year only because of all the money Arthur has spent on lawyer fees to get his 98 year old Mother (Jane) back home to 26 Chancery court as the courts hand picked psychologist "expert" George Ledakis, said where she could stay and with her son Arthur.

6. There were never any examples named in jsh's petition or in court hearing that Jane needed to be kidnapped (taken away, by force, against their will, for monetary benefit) using deception by Dwayne Logie and jsh. There was never any court order by judge Weilheimer for the kidnapping.

7. In fact, to date, neither Weilheimer, jaskowiak, jsh, or logie have admitted or said if they had ordered the kidnapping of Jane and why it was done. Invoices by Logie show the kidnapping was part of the "Plan".

8. Jane's court assigned lawyer by Weilheimer, jaskowiak, refused to bring in any of the people Jane dealt with every year including her doctor of 21 years, CPA, investment people at Raymond James who have handled her/late husband money for 21 years, bank records, monthly check statements, etc. Those people would have proven Jane did not need any guardians.

9. The fact is, over a year before jsh filed her fake guardianship petition, because of jsh's bizarre and extremely untruthful lies about Jane for several years, Jane's investment company, Raymond James, put a ceiling of \$1,000 of how much Jane could spend or write a check for unless both jsh and Arthur both approved. Therefor, there was never any financial problem where Jane needed a guardian of person and/or estate. Therefor, Weilheimer labeled Jane incapacitated without any justification.

10. The fact is, Jaskowiak, WANTED Jane to be deemed "incapacitated" so Jane and her assets would become another victim of the Racket, as many others have

been victims for decades by the Norristown Orphans Court. Such corruption has been documented for at least 20 years on Facebook at Shenanigans of the Montgomery County Court.

11. After being labeled “incapacitated” by the court, various corrupt guardians, corrupt lawyers, corrupt judges and corrupt psychologists, the Racket could begin their crime of stealing by using unjustified lawyer, guardian and care manager billing hours, to illegally enrich themselves and deprive the victim of their assets.

12. Besides stealing the victims money, the Racket would sell the victim’s house, to a friend extremely cheap and then resell it at the full price and keep the profit for themselves. They would deny the victim and the family the profit.

13. Following an almost nationwide playbook, those in the Racket and individuals would begin a process of owning “slaves” for life until the victims die or are broke (which ever comes first) as their private bank accounts become empty.

14. In Pennsylvania, PA title 20, Section 5521, states exactly how guardianships are supposed to work and how guardians are supposed to act with the person.

15. Section 5521 is very clear. The guardian is to assert the rights and best interests of the person, their wishes and preferences must be respected to the greatest extent possible, the guardian is to construct a plan for the benefit of the person, encourage the person to participate to the greatest extent in the decisions that affect that person, to act in his own behalf whenever he is able to and to develop or regain to the maximum extent possible the person’s capacity to manage his own personal affairs.

16. At NO time, has that law ever been followed by the court, guardians, their lawyers and Jaskowiak. Their ONLY desire has been greed for themselves, Jane and her life be damned.

17. For almost two years, Jane has been locked in a very low rated nursing home, in solitary confinement, in a sensory deprived environment, no phone, no access to reading materials, not allowed to see ministers, friends or send or receive mail.

18. Jane has never been judged or claimed to have any mental or behavior problems that would indicate she is a danger to herself or others, in private or in public. Jane's was only found "guilty" of having a little forgetfulness, hardly a reason for Jane to be locked in a tiny room, in solitary confinement and in a sensory deprived environment and deprived of exercise, friends and her loving and devote son.

19. For two years, Arthur has tried in every way to get his Mother back home, where Ledakis said she should be and with Arthur so she will be able to live her life as normal and happy as it was before she was kidnapped by jsh and Logie.

20. Jane has no exercise, no mental stimulation, no happiness, is extremely lonlie and is treated and housed like a mouse in a cage. Jane is a human being, not a animal who just happens to have a lot on money.

21. Jane has made it very clear recently, both in a letter and by mouth, and would say it again today if asked that she wants to go home and Arthur to live in the house, whether she lives there or not.

22. In May 2022, Jaskowiak said in a Zoom call with the lawyers and weilheimer that he saw Jane in her room, she said she like the place, food and people. So,

Jaskowiak is saying Jane knew what she wanted. About April 2022, Jane wrote a letter to Weilheimer and said she wanted to go home, come to court to tell the judge that, wanted Arthur to live in the house with her as he had been and also wanted a phone in her room until then. Weilheimer and Ledakis claimed Jane probably did not know what she was writing. But, they never asked Jane if that was what she wanted. How can Jaskowiak make the claim he claimed Jane made, but Weilheimer and Ledakis said Jane could not have made that claim?

23. At Jane's invitation, Arthur was living at her home for over a year with a private bedroom and bath.

24. Even though Jane was still driving a car and was living totally independent, she appreciated all of the things Arthur did for her and for her house, car and other matters.

25. Jane always enjoyed all of the fun times she and Arthur shared, including going to restaurants, shopping, walks in the park, Valley Green, going to the cemetery to see her husband, Mother and grandparents.

26. Arthur has always volunteered to pay for the yearly housing costs of the house from the gift money Jane gave each year to her children which would cover the cost of the operation of the house. Court had accepted those costs as \$16,500 a year. Jane is paying \$90,000 for her tiny room for the past two years and is a total waste of Jane's savings that she may need later for private nursing care or physical therapy at another location. Jane still does not need any extra daily care.

27. Because Jane's house is one of the largest in the private gated community, it always increases in value every year.

28. The Jaskowiak, "guardians" and their lawyers have not done anything to make Jane's life equal to or better than it was before they got involved. The fact is they have made it far worse, cut years off of her life and health by keeping her in isolation, deprived of every mental and physical activity, caused her enormous pain by being deprived at her late age of her loving son, her beautiful home, her loved possessions and her happiness at being alive and painfree.

29. Instead of a few basic problems being solved, such as where Arthur lives and what happens to the house and possessions if Jane cannot live there, jaskowiak, guardians and lawyers continue to MAKE problems deliberately for Jane and Arthur only to create as many fake and unneeded billing hours as possible only to enrich themselves by draining Jane's assets, instead of for the benefit of Jane and Arthur as stated in the law: PA Title 20 Section 5521 .

30 The Racket has adopted a policy of blaming Arthur for the loss of money for lawyer billing hours to Jane by his actions, but it has been Jaskowiak, the guardians and their lawyers who ignore the health and welfare of Jane and waste her money on Jane's current grossly overpriced tiny "pig pen" at \$90,000 a year when Jane could be living in luxury at home for the court's accepted price of \$16,500 a year. Again, they ignore the law: Title 20, section 5521.

31. For some unknown reason, Judge Weilheimer stated in court a year ago that if Jane comes home, Arthur cannot live there. Arthur has agreed to move out and get another place to live. But, Weilheimer seemed to forget she ever said that.

32. All subpoenas to bring Jane to court to state for herself what she wants have been refused by judge Weilheimer, which clearly violates PA state law Title 20, Section 5521.

33. About early 2023, the guardian of the estate Fenstermacher, signed off to have Arthur evicted, Jane's loved possessions of 98 years trashed and Arthur evicted. When asked when was the last time Fenstermacher saw or talked to Jane, he replied "About 2.5 years ago". How can Fenstermacher ignore state law and at the very least, talk to his client and ask her what she wants and recorded?

34. Guardians have obligations and requirements they must follow and obey, especially PA Title 20, section 5521. Fenstermacher, all guardians to Jane past and present, their lawyers and care manager Klock have broken that law.

35. Unless Jane goes home, as she wants and has the right to demand, or is moved to a unfurnished, large apartment like place in a nursing home where she could have some of her furniture and other loved possessions, all of Jane's loved possessions of 98 years will be trashed.

36. There is no room in Jane's very tiny room to put anything now. There are no tables in her room. She has to store things in plastic bags on the floor since she has been where she is.

37. So far, NO one has said what was Jane's crime that she had to be kidnapped from her very large 3 bedroom, 3 bath house, in a private gated community and forced to live in her present tiny cage, no phone, not allowed outside for 2 years, in solitary confinement, in a sensory deprived environment, no visitors allowed (including ministers) no phone calls to or from friends (including Arthur), basically no TV channels to watch and forced to be with people who have behavior and mental problems.

38. The ONLY people who have benefitted from Jane's fake guardianship is the judge, guardians, their lawyers, Jaskowiak, and the psychologist Ledakis who the court keeps picking (3 times now) to "evaluate" Jane, but they ignore his advice if



they do not think it is to their benefit, such as Ledakis saying Jane could live at home with Arthur as Ledakis said in his first report before the petition hearing.

39. After Arthur exposed Ledakis's "evaluation" as a fake during the petition hearing and in Ledakis's other "evaluations" of Jane as being fake, since then he has attacked Arthur and made Jane sound as if she is past hope.