

MORE LIES BY JASKO RAT ABOUT ARTHUR

Jasko rat never wastes time avoiding the problems that only I find, NOT jasko rat, guardians, care manager klock, fenstermacher, blumer and all of the other shisters, that affect Mother's health and happiness, But, instead jasko rat concentrates on sliming me to push the blame away from him and the others and tries to put all blame and problems only on me.

Jasko rat filed this piece of garbage about 2 months before Mother was killed/died by them by keeping Mother unconscious with morphine where she died a very slow, barbaric and inhumane death by dehydration and starvation.

Jasko rat claimed I refused to meet with their new paid liar, they call their "monitor". She, like the past 2, only wrote lies about me for the mafia to use to deny and severely restrict my visits with Mother. I refused to meet this most recent paid liar because I knew the mafia was still playing their same old game to deny me visits with Mother, PLUS I had to pay for those paid liars. Why would I be so stupid as to waste the little money I was getting from welfare and living in my car summer and winter after jasko rat and fenstermacher evicted me from Mother's house in august 2023, to pay THEIR paid liars to have this new person make up the same lies only to screw myself by playing THEIR same game? THEIR game was always to keep me AWAY from Mother.

I proposed several times that if they thought I was doing what they claimed, why not use a cell phone to record audio and video of the visit. Then they would have proof of what I said or did. But, at several hearings, ALL of the shisters and jasko rate begged sterling to DENY my plan. Sterling did. Cell phones do NOT lie, paid liars do.

Plus, according to US law, a person is presumed innocent until proven guilty in a court of law and they have a RIGHT to face their accusers. I guess NONE of those lawyers and judges ever went to that class.

Poor cry baby jaskowiak cries about me giving my news letters to some of his neighbors telling them that cry baby is only a common, disgusting thief and an animal. If cry baby thought those my news letter had lies, why hasn't he ever sued me for liable? Cry baby was so obsessed with knowing what I was saying and doing on a radio show I was a co-host of for about 1.5 years that only dealt with guardianship corruption, that he listened each week to it for its 90 minutes. Of course, he charged Mother for it.

Jasko rat goes on to say I had no legitimate purpose of my actions. WTF? I was always trying to get Mother home where she would be happy and healthy again. He whines about I used a fake name on the radio show. I did so deliberately because jasko rate had put me in prison twice for revealing information about the scam on my Mother. The listeners knew why I could not

use my real name. I always referred to Mother as a very much loved person so I would not say her name.

Jasko rat has the balls to say that some of the guardians want to get into Mother's house to get some of her things for the pig pen to make Mother happy. BS! If they wanted to make her happy, why didn't they take mother back home where she belonged? The fact was, those monsters knew Mother was dying (they never told me) and they just wanted to steal what they liked. Maggots.

4/22/24

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

NO. 2021-X2110

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

**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
(WHICH WAS ERRONEOUSLY CAPTIONED AND IS BEING RESPONDED TO
AS A "MOTION FOR RECONSIDERATION")**

Respondent, Jane T. Herring, by and through David A. Jaskowiak, Esquire, her court-appointed counsel, hereby files this Reply and New Matter to the Answer of Arthur Herring, III, (which has erroneously been captioned and is being responded to as a "Motion for Reconsideration") and sets forth the following:

1. It is admitted that this Court properly has jurisdiction of this matter.
- 2-91. Denied. Initially, Respondent Jane T. Herring respectfully submits that the pleading filed by Rev. Arthur Herring, III, ("*Arthur*") is *improper* and is *not* permitted by Orphans Court Rule 3.6, which strictly limits pleadings to a "Petition" or "Motion," an "Answer," a "Reply," or "Preliminary Objections." As such, Arthur's "Answer" is *not* a proper filing in response to the Court's Order and is not authorized by the rules of procedure. It

is therefore being viewed as a "Motion for Reconsideration" and a request that the Order be stayed pending further hearing by this Court. Respondent denies each of the averments of Arthur's Answer for all of the reasons previously stated in multiple filings and in open court, all of which are hereby incorporated by reference.

In light of the fact that Arthur has now apparently sought reconsideration of the Court's April 3, 2024 Order, Respondent requests that the Order be **STAYED** with respect to Arthur's right to visit his mother and that visitation *not* proceed until the time of hearing or until further Order of this Court. It is important to note that Arthur has now refused to cooperate with or meet the Court's designated visitation supervisor. In fact, despite the court's ongoing, multiple admonitions not to re-litigate issues which were already been decided by this Court, and despite this Court's multiple requests for him to maintain civility and respect for the parties involved, Arthur has increased and amplified his grievances to the point that he has now filed 91 paragraphs of caustic, vicious comments about this guardianship matter. Arthur also informed the current guardian of the person, Cynthia Ellis, that he did not have the time to meet with the Court's own designated visitation supervisor, Ms. Eurinika Harris, on Wednesday, April 17, 2024. However, Arthur did *not* provide, and continues to *refuse* to provide, alternate dates and times to meet with Ms. Harris, which is essential to implement the Court's April 3, 2024 and provide meaningful interactions by Arthur with his mother Jane. Instead, Arthur has returned to his oft-stated position that supervision is unnecessary and that his mother should return to live at her previous home at 26 Chancery Court in Souderton and that he should be allowed to live with her. Once again, Arthur has demonstrated that he is unable

to comprehend the reality of his mother's medical condition and her significant cognitive impairments.

Respondent notes that while Arthur has stated that he was "unable" to meet with Ms. Harris, he has somehow "found the time" to continue his relentless, multiple, almost daily email screeds to Respondent's court-appointed counsel, to the guardian of the person and to the guardian of the estate.¹ Arthur *also* somehow "found the time" to visit the neighborhood where Respondent counsel lives and "found the time" to harass Respondent's neighbors, none of whom have any involvement in or familiarity with this proceeding, by personally hand-delivering a single space, two page screed on April 10, 2024. See Exhibit "A." That screed was circulated throughout the neighborhood, and was put under each of the neighbors' door mats (and in some cases slipped under their front doors). Clearly, the intent was to instill fear in the neighbors where Respondent's counsel lives and to attempt to intimidate and embarrass him or worse. Respondent has also confirmed with a number of his neighbors who have indicated that they are concerned about their own safety and the safety of their young children. The incident has been reported to local law enforcement authorities, who are now investigating Arthur's actions.

As stated to the Court at the time of the March 20, 2024 hearing, Arthur's neighborhood door-to-door campaign is intentional and is a part of his *modus operandi*. On his podcast on March 25, 2023 (*where he disingenuously and falsely identifies himself*

¹Rather than further clutter the record at this time with Arthur's rants, Respondent will provide copies to the Court if required upon request or at the time of hearing.

as "Reverend Ralph"), Arthur stated:²

@ 11:46, "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.**"

@12:08 Referencing a tactic where political operatives harassed certain political leaders in public places during the Trump administration, Arthur (as "Reverend Ralph") said, **"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."**

The full podcast can be found at: <https://www.blogtalkradio.com/marti-oakley/2023/03/25/ts-radio-network-peaceful-protests>

None of Arthur's behavior is for a legitimate purpose and only serves to underscore the position taken by Respondent's counsel at the time of the last two hearings and throughout these proceedings that Arthur's grievances are not in Jane's best interests and are only advanced by Arthur to fit his own narrative and to serve his own personal interests.

New Matter

Respondent has been advised that the guardians wish to retrieve certain personal possessions belonging to Jane Herring from her former residence at 26 Chancery Court in Souderton for her personal use at Manatawny Manor where she currently lives. Respondent proposes allowing entrance to the guardians and/or their designees,

²The incredible irony of one who now demands to be recognized as "Reverend" (i.e., a "man of the cloth") assuming a false persona and misrepresenting himself to his podcast listeners cannot be understated.

~~guardian of estate. The items removed will catalogued and the list will be available to~~
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guardian of estate. The items removed will catalogued and the list will be available to
the Court and/or interested parties as the Court may direct. The Court had previously

~~ordered that removal of Jane's personal items was not allowed without prior authorization~~
of Court. Removal was further complicated by the fact that entry to the premises was not
possible while Arthur was inhabiting the premises. He has since vacated, and access to
the property is possible. Respondent believes, and therefore avers, that the retrieval of

personal possessions may add to the quality of life that Jane currently enjoys

WHEREFORE, Petitioner respectfully requests that the Court grant the
following relief forthwith:

1. Issue an Order staying this Court's Order dated April 3, with respect to
allowing any visitation by Rev. Arthur Herring, III of his mother Jane T.
Herring until further hearing and Order of this court.
2. Require Rev. Arthur Herring, III to meet with Ms. Eurinika Harris, the
Court's designated visitation supervisor at a time and on a date which is
mutually convenient and at a location arranged by and/or approved by this
Court.
3. Strike and/or overrule Rev. Arthur Herring, III's "Answer" and direct that
any future court filings not re-litigate issues already decided by this
Honorable Court and that each filing be in a format authorized by Rules of
Procedure or the court filing will be struck *sua sponte* without the need for

further response by any party involved in this matter or any party against whom a filing by Rev. Arthur Herring, III is directed.

4. Schedule a hearing forthwith on this matter regarding the security concerns which have been raised regarding the ongoing inappropriate behavior of Rev. Arthur Herring, III.
5. Authorize the guardians of person and estate, and/or their designated representatives, to enter the premises at 26 Chancery Court in Souderton for the purpose of retrieving personal items belonging to Jane T. Herring for her personal use at Manatawny Manor.

Respectfully submitted,



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DATED: April 22, 2024