

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE  
DISTRICT OF PENNSYLVANIA**

<b>Robert Leone,</b>	:	: <b>CIVIL ACTION</b>
<b>Plaintiff</b>	:	: <b>NO. 3:12-cv-00429</b>
	:	
v.	:	
	:	
<b>Towanda Borough; Charles Sands;</b>	:	
<b>Pennsylvania State Police; Roger Stipcak</b>	:	
<b>Scott Refner; Andrew Burian;</b>	:	
<b>Matthew Knock; Thad Warnick;</b>	:	: <b>Judge Caputo</b>
<b>Timothy Young; Thomas Jordan;</b>	:	
<b>John Werner; David Lantz,</b>	:	
<b>Defendants</b>	:	: <b>JURY TRIAL DEMANDED</b>

**FILED  
SCRANTON**

SEP 30 2015

Per  \_\_\_\_\_  
DEPUTY CLERK

**DECLARATON OF ROBERT LEONE**

On September 28, 2015, I was interviewed by Andy Ostrowski about my case. I am submitting the video, as well as the September 19, 2015 video of my mother, Joan Leone, in support of my motion.

Making that video was very difficult for me, as it brought up some very difficult memories for me.

One of the things that I was intending to talk about was that I was a victim of sexual abuse by the Defendants Stipcak and Burian. It happened at the Pennsylvania State Police barracks during the evening of March 8, 2010 or early morning of March 9, 2010.

The lawyers at SMGG were made aware of all of these facts.

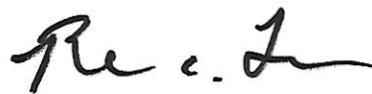
The facts that were stated by my mother in her video about her observations of me and the things I went through, and continue to go through, are true and correct to the best of my knowledge, information and belief.

The lawyers at SMGG did not discuss with me at any length the matter of me testifying at trial, and we never sat down and practiced my testimony; they just informed me that I was not going to be testifying.

I have a recollection of everything that happened on the evening of March 8 into the morning of March 9, 2010, and I told my lawyers at SMGG about all of it, and I will be prepared to testify about it at my next trial.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30<sup>th</sup> day of September, 2015



9/30/2015

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Robert Leone