

*E. J. J. J.*

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Strassburger McKenna Gutnick & Gefsky  
444 Liberty Avenue Suite 2200  
Pittsburgh, Pa. 15222

October 24, 2014

Dear Joe, Matt, Trent:

Now that we have a break before trial begins, this seems like an opportune time to address concerns and requests. When we last spoke by phone, on August 18, 2014, you spoke of "a large package" of previously requested documents—transcripts-etc. having been sent to us on Thursday/Friday (Aug.14/15); it has not been received. As there also has been no reply to our phone call/message of two weeks ago, we hope to have a better outcome with a mailed request.

It has been our experience that in the past you have informed us when you requested certain documents—Bradford County Correctional Facility (BCCF) pictures of March 9, 2010—taser report from 12A.M.to 8A.M.—COMPLETE Internal Investigation report/before and after the police statements --- the Police Barracks video of March 9, 2010 (from 12A.M to 8A.M) —you were told they do not exist; we know they do. Connie, the nurse, took the pictures at BCCF; Taser International told us they have the recorder report up to the time the officers got OFF DUTY that morning; Corp. Stipcak was required to resign or be fired. That is why we have requested , as far back as early 2012, for you to subpoena them —we still want them!

As we are well aware, consistent history has proven that we are TOLD things do not exist, when in fact we know—and find out —they do; only last week court documents were obtained that had information changed, omitted, or added too, that was not there before. There is a flagrant attempt at deception to withhold pertinent information that would validate

Bob's truth and, more importantly, essential to his healing; therefore we know you understand how imperative and necessary "to subpoena" being the legal option necessary to obtain that which is hidden.

We, again request the following, in addition to the above mentioned:

- All depositions, including but not limited to, Bob's deposition for the Attorney General and at the Scranton Law Firm which represented the local police
- Copies of all communications , including emails, to/from all parties; continue, as formally requested, to "cc:" future exchanges
- Copy of the psychiatric evaluation you arranged for Bob

As you have indicated you will be focusing on "the first 36 hours" perhaps a meeting concerning the recorded audio, ( a copy was given to you in early 2012), should be arranged. This is—in Bob's own terrified voice—spoken in the first fourteen hours – what transpired and the "death threats" of the previous eleven hours while under the custody and control of the Pa. State Police. Both parties (Bob and his mother) were INFORMED that the conversation was being recorded so it is legally valid and important.

We look forward to hearing from, and meeting with you all again.

TO: Matthew Collins  
FROM: Joan Leone  
RE: Robert Leone/Civil Complaint

This is a continuation of the Fax sent on Friday.

We wish to share with you why we feel so strongly about not removing the Commonwealth of Pennsylvania from the Complaint; to establish the legal connection and authority the Commonwealth of Pennsylvania exercises over the Pa. State Police.

The Commonwealth of Pennsylvania is a sovereign state and at all times responsible for the operation and control of the Pa. State Police. In turn, the Pa. State Police is a state agency of the Commonwealth of Pennsylvania and the conduct and acts of the Pa. State Police violated the laws of the Commonwealth.

As stated before, concerning including Memorial Hospital in the complaint, in addition to their responsibility to have Bob's vital signs within normal limits before he was discharged, and to conduct a follow-up when he came in on a stretcher with a history (only hours before) of head injuries, it is important to note that within minutes of leaving the Hospital, Bob was unconscious at the Barracks. Also to be noted, B Jenkins told the BCCF correctional officer that Bob had six taser prongs to his back at that time.

We can not, in good conscience, allow this to not be addressed. This is not about money; this is about proper and complete treatment when one goes to an emergency room.

Is it appropriate to clarify Trooper Renfer being at the Wyoming State Police Station and not the Towanda State Police Station? Are they both "Troop P" ?

There are two of Bob's Civil Rights that were violated that should be included:

- a) Maranda Rights not read
- b) five days before given his first phone call

Thank you for responding to our concerns; we look forward to hearing from you today as time is so short.

Regards,

Frank & Joan Leone

*Sent Mon. March 5-2012*

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