

## Middle District Court of Pennsylvania

Worman Pro Se :  
Vs. :  
Barasse Et Al. : MDPA- 23-cv-01488.

Response to Motions to dismiss. Here comes Yvonne Worman, plaintiff, on April 2, 2024, with reply to all motions to dismiss this lawsuit. I allege the following:

1. **Attorney Nancy Barrasse:** Failed to use due care, in the case of Paul M. Wolski Sr.. She solicited her judge brother, and did in fact help John J. Mchugh get off house arrest, and helped him with his plan to get his driver license reinstated, to specifically secure the guardianship of Paul M. Wolski Sr. This was under fraud by Mchugh, and then court misconduct. This led to the Fake PFA that she assisted in filing against me, not served, and was placed out of jurisdiction. She engaged in the intentional infliction of emotional distress and financial damages, and conspiracy to violate 1st, 2nd, and 4th amendment rights. She and the

court crossed county lines, acted out of their jurisdictions, and engaged in 4th amendment illegal search and seizure of a person on May 22, 2023, ie, trespassing And kidnapping. She continues to unlawfully hold Paul M. Wolski Sr. against his will, and against state/federal disability laws, and contributed to the death of Paul M Wolski Jr., my nephew and godson. She failed to present Paul Sr. at the change of guardianship hearing on 9.15.2021. She and Liberty HC misrepresented to me and the court about what Paul Sr. truly wanted. She and all defendants are responsible for contributing to the death of Paul M. Wolski Jr. I allege she engages in misconduct, and the disciplinary board has failed to correct this. The Supreme Court failed to protect Paul Sr., a disabled person, who is also protected by Federal Laws. This appears to be repeated standards of practice in Lackawanna and throughout the state. Thousands of victims repeatedly complain on social media and news platforms about Lackawanna courts. This was done while engaging in Ada discrimination. Alleged gross and culpable negligence,

defamation, slander, fraud, intentional financial damages, emotional distress, trauma, and the wrongful death of Paul Jr. I allege that she is fully aware that she and the court has both state and federal protection, with Pa. agents, that is why they engage in these behaviors.

2. **Attorney Shane Scanlon:** He consistently and repeatedly violates his duties owed to his client, Paul M. Wolski, and continues to refuse to act on his behalf, and under Paul's expressed wishes. He has been intentionally unsuccessful in his ability to win ONE court hearing on behalf of Paul Wolski Sr., out of many. He engaged in misconduct, perjury, and conspiracy to violate my 1st, 2nd, and 4th amendment rights. He allowed No Due Process and the kidnapping of Paul, as Paul's "representing" attorney. He directly contributed to the death of Paul M. Wolski Jr. by not protecting his own client. He failed to present his client at the guardianship hearing on 9.15.2021, leading to egregious misconduct against us. His written response is excessive and overbearing. It appears to try and deflect from his

incompetence/misconduct. He was named in another civil rights lawsuit, and has a history of alleged misconduct accusations, repeatedly, on social media platforms. Patterns and practice. The president judge, and the Supreme Court has failed to provide Paul with a new, competent attorney that will do as Paul asks, and an indigent person. I did not "lose" guardianship, it was intentionally stolen under hostile and fraudulent circumstances. This was done while engaging in ADA discrimination. Alleged gross and culpable negligence, defamation, slander, fraud, intentional financial damages and emotional distress, trauma, and the wrongful death of Paul Jr.

### 3. **Family Services Association, Sean Gerow, and Nancy**

**Hudack.** This facility engages in egregious unlawful activities, to secure guardianships of the disabled, the elderly, and children. Nancy Hudack signed an unsworn falsification, and filed fraudulent court paperwork on 2/16/2022. Complaints to FSA and her CEO went ignored and unaddressed, leading me to believe they all engage in

unlawful activities, with the protection of Lackawanna and possibly Luzerne Courts and All PA. state and Federal authorities. They inflicted intentional financial damages, emotional distress, conspired to violate my 1st, 2nd ,and 4th amendment rights, and all directly contributed to the death of Paul M. Wolski Jr., for monthly profits. This is guardianship abuse. Paul repeatedly states that he wants them terminated, due to violations of duties of the guardian, yet they and the court refuse to give him up, for the continued money and profits. They continue to engage in misconduct and all authorities allow it to continue. The majority of authorities were all "nominated", and are from Lackawanna County. It is believed that there are thousands of victims of Fsa/Pa.courts. This was done while engaging in Ada discrimination. Alleged gross and culpable negligence, defamation, slander, fraud, financial damages, emotional distress, trauma, and a wrongful death.

4. **Judge Corbett, Judge Brasse, Judge Geroulo, Frank**

**Castellano:** I allege all engaged in court misconduct, and

then rely on claiming judicial immunity. All have a history of repeated claims of " NO DUE PROCESS". They all violate their oaths to the law. Castellano blames the conduct on a " now defunct" system, yet he was advised in writing of the alleged misconduct and violations for over 1.5 years. He sits idly by and cooperates in and watches the misconduct, and allows it, for profits. It's their pattern of practice to use "No due process", in their courts. Paul was not present at his own hearing on 9.15.21, and the Supreme Court has failed to CORRECT this misconduct, and release Paul. He is being held illegally and against his will, because a county attorney, Nancy Barrasse "says so". She is abusing her powers and submitting Liberty HC petitions, unbeknownst to Liberty HC. We lived in a different county. She had NO jurisdiction. A fraudulent, fake PFA, filed out of jurisdiction, not served per 1903.4, not placed on the dockets, and against the wards wishes. This is misconduct and guardianship abuse. This PFA has made it through ALL PA. courts FIVE times. The guardian lied about Paul's address on the form. The court

was made aware, with appeals, yet it still passed through Lackawanna court Three times. It appears someone else typed up the PFA. Who? Let's find out. It was then handed off to Nancy Hudack, where she then manually filled in the rest by hand. They intentionally punished me for their own errors. The fake PFA remains on both of our dockets at both the Superior Court and the Supreme Court. Both higher courts refuse to delete it, despite this being a fraudulent document. The Supreme court upheld the FAKE/Fraudulent PFA on paper, but addressed them privately, in writing. They have all failed us and our family. The guardianship was changed under "no due process and fraud" by Mchugh, and then judicial and procedural misconduct by Lackawanna Courts, while engaging in a cover up. They had to have that guardianship. Eight written complaints by me and five written complaints made by Paul, sent to the judicial and disciplinary boards were All dismissed and ignored at the Supreme Court Level. The same as in the Kids for Cash scandal. The state continued to financially benefit. All

defendants failed to use "due care". All engaged in misconduct. This appears to be a STATEWIDE court problem. Pennsylvania is a very sick, unhealthy state. There is no good reason to live in Pa. if you can't get the authority or government services that you repeatedly ask for, as a tax paying citizen. Why live in Pa. if you are intentionally abused, terrorized, and traumatized by that same government, at county and state levels? All while engaging in ADA discrimination. Alleged gross and culpable negligence, defamation, slander, financial damages, emotional distress, trauma, and the wrongful death of Paul Jr.

5. **Attorney/Clerk Virginia Barrett:** Engages in court misconduct. She engaged in ADA discrimination tactics, and federal violations, and placed Paul on mute at the 3rd PFA hearing on 3.28.22, so he could not confess to all present. She emails and sends me invalid orders, not stamped, she does not file orders, and she emails orders to me without permission to send by email "on file". She fails to serve petitions and orders. In February of 2023, I received an



invalid/fake petition, sent to me by Judge Geroulo and Sean Gallagher. Its signature verification did not come from Fran Kovaleski, and it names a different petition, in its description. That signature verification is the only paper without a date or a court timestamp on it. She contributed to the death of Paul M. Wolski Jr.. Alleged gross and culpable negligence, defamation, slander, fraud, financial damages, emotional distress, trauma, and a wrongful death.

**6. Fran Kovaleski:** It is believed that Ms. Kovaleski is aware of all of the attorney and judge misconduct and she cooperates in it, looks the other way, and fails to report it. This generates court funding. I received TWO invoices to pay for a document that they failed to stamp and return to me. With full knowledge of our allegations, via her filed emails, she continued to engage and support the court and placed a stamp, and signed a certification, on a 5/24/2023 order. She contributed to the death of Paul M. Wolski Jr. . Alleged gross and culpable negligence, defamation, slander, fraud,

emotional distress, financial damages, trauma, and the wrongful death of Paul Jr.

**7. Lackawanna Da, Mark Powell, Judith Price:** numerous, repeated emails, mail, and complaints to the DA went ignored. Hundreds. It is evident that the DA gives protection to the Lackawanna Courts and all defendants, and failed to act or use due care. A county detective, then pretended to “open an investigation”, and failed to investigate for 8 months. He strung us along. He placed a phone call to Paul only after this lawsuit was filed, just so he could say he “did” call Paul. They contributed to violating our 1st, 2nd, and 4th amendment rights, and contributed to another wrongful death. They Intentionally inflicted emotional distress and trauma and financial damages. See The Estate of Nina Gatto Vs. Lackawanna, another incapacitated person that was used and abused by the county, for their own advancements. Shortly after this case was filed, John J. Mchugh was charged with 3 felonies, in reference to insurance fraud/drivers license perjury. It is believed that Mchugh lied

on his driver's license application, and in March of 2024, he was recently cited for driving without a license. Alleged gross and culpable negligence, defamation, slander, fraud, emotional and financial distress, trauma, and the wrongful death of Paul Jr. . Mchughs hearings have been postponed four times and he remains free. Charged in October of 2023, and the next hearing is in June. He receives continued favors. YET, they refused to release Paul, under civil and Ada rights violations, and now Paul's son was found deceased, due to the civil rights and ADA restrictions from his father, and much needed family support.

**8. Attorney Ruth Borland** :Engaged in misconduct, cooperated with the court, with full knowledge of placing a fake and misrepresented PFA, and prepared and mailed in 7 bound appellee booklets to the Superior court. She did this with full knowledge of Paul's court confession, knowledge of the guardians fraud, and she did so knowing she was not Paul's attorney and she had no legal/written authority to represent him. She failed to protect FSA, and brought them

into this lawsuit. She failed to use due care, and conspired to violate our 1st, 2nd, and 4th amendment rights, inflicted intentional emotional distress, and financial damages, and contributed to the death of Paul Jr. under misconduct.

Alleged gross and culpable negligence, defamation, slander, fraud, financial and emotional distress, trauma, and the wrongful death of Paul Jr.

9. **Eugene Eiden:** with probation, was made fully aware of probation violations and complaints made against John Mchugh. He and Alfred Piazza received at least 40 emails with evidence of the probation violations and they were grossly negligent and failed to act. It appears that he went out of his way to protect John Mchugh. He caused stress and emotional trauma with his failure and inactions. He contributed to violating my 1st, 2nd, and 4th amendment rights. Alleged gross and culpable negligence, defamation, slander, fraud, emotional and financial distress, trauma, and the wrongful death of Paul Jr.

10. **Liberty HC, Laurel Masco, Sarah Marion,** and Alison

Cave also participated: This company and employees are either extremely negligent and uneducated in their work, or they intentionally steal people, for profits, regardless of the circumstances. They acted negligently in this case. They were informed of the criminal record of John Mchugh, and Paul was deemed incapacitated with a brain injury. They used defiant trespass, on video, to start their investigation. We were residents of a different county. The actions of this company and these people are beyond egregious and appalling. Mchugh was under investigation for a drug overdose death at the time of securing and detaining Paul, against my wishes and complaints. Laurel Masco signed the original Liberty HC paperwork, stating that she believed it to be true, despite my persistent, unlawful allegations against Mchugh. She was protecting herself when she embellished a report of need, in February of 2022, when Paul confessed in a recorded video. You should see the video. She then engaged in court misconduct to hide her errors. She and

Alison Cave then cooperated with placing a FAKE PFA, in another county, and not in Lackawanna jurisdiction. All defendants abused their powers, conspired to engage in a cover up, and placed a fraudulent PFA, despite " No fear of bodily injury", per Pa. State Code 6102. They all inflicted intentional financial and emotional distress, intentionally violating my/our 1st, 2nd, and 4th amendment rights, and contributed to the death of Paul's son. They were all aware of Paul's confession, and they also knew that Mchugh assaulted Paul on 9.15.21, and ALL continued to proceed to engage in this misconduct. Sarah Marion assisted, cooperated with, and gave the order to take and secure Paul from my home, on May 22, 2023, under the 4th amendment illegal search and seizure. The order was invalid, no stamp or seal, and it was never filed on the docket, because they knew they didn't have the jurisdiction. She/they directly contributed to the death of Paul M. Wolski Jr. Liberty HC is fully aware of the Lackawanna County Court misconduct, and they do nothing about their hired county rep. engaging

in misconduct. Alleged gross and culpable negligence, defamation, slander, fraud, emotional and financial distress, trauma, trespassing, kidnapping, and a wrongful death. Liberty management and their attorneys have continued to ignore hundreds of complaints made to them. They fail to instruct their attorney to perform on Paul's behalf. It appears they all cooperate for state/federal monies. Their attorney John Beck also ignored all many complaints and failed to report attorney misconduct. All engaged in Ada discrimination and all contributed to the death of Paul M. Wolski Jr.

11. **State Police/Commissioner:** Dozens and repeated complaints, mailed, emailed, and faxed, with evidence of law violations to the Dunmore, Harrisburg State Police and to both prior and current Commissioners. ALL went ignored and unaddressed. I allege they give protection to Lackawanna and ALL Pa. courts. The prior Commissioner was from Luzerne County. The current Commissioner is from Lackawanna. Alleged gross and culpable negligence,

defamation, slander, financial and emotional distress, trauma, and the wrongful death of Paul Jr.

12. **DHS,APS, Aging,:** Dozens of written complaints with evidence to DHS Valerie Arkoosh, Aps, and Lackawanna Aging Jason Kavulich, went ignored and unaddressed. They contributed to the death of Paul M. Wolski Jr. Both Arkoosh and Kavulich were nominated for their positions by the governor and the new aging director is from Lackawanna. Alleged gross and culpable negligence, defamation, slander, fraud, financial and emotional distress and the wrongful death of Paul Jr.

13. **Jerry Notariani and County Commissioners,** It appears these people repeatedly cooperate with the county's misconduct. Numerous and repetitive complaints via email, fax and mail, and complaints on the county "waste" website ALL went ignored by Notariani, and all commissioners for over 1.5 years. Recently Attorney Fredrickson was nasty in an email, and told us that " we are entitled to NOTHING", and then he threatened to have the Lackawanna DA file



charges against us, despite the clear and convincing evidence of misconduct by their county, court, and employees. He stated that he was represented by Harry Coleman, but this attorney had not yet entered appearance on HIS behalf. Entry for appearance was filed a few days later. Alleged gross and culpable negligence, defamation, slander, fraud, emotional and financial distress, trauma, and the wrongful death of Paul Jr.

14. **Universal Rehabilitation Institute:** All parties including the attorneys and administration, cooperated in ADA discrimination violations and fraud with the Guardian, FSA/Nancy Huadcak, for funding. They cooperated with an invalid PFA, with no stamp or seal, and it was placed from another county, for an incident that happened in Northampton County. They cooperated in ADA violations, at the direction of the guardian. They have NO backbone, and they did not push back against said violations. Based on only hearsay by the guardian, the caregiver called and made a false police report, that I came and took my brother from

their facility, when in fact, he ran away. They named me in a false police report and then handed over another invalid order, with no seal or stamp, produced by Lackawanna under fraud and the court did not have the jurisdiction. The police officer noticed this, and it was referenced in the police report. They cooperated to continue to get state/federal funding, and they cooperated in the federal offenses of isolation and retaliation tactics against ADA and civil rights. US code 12203. They sent three representatives to my home on May 22, 2023, and criminally trespassed and criminally stole Paul Wolski under 4th amendment illegal search and seizure, with an invalid, unsealed and non filed court order. Their attorney appeared in court in July of 2023, and she enticed the caregiver to commit perjury, and to say that he had seen my vehicle at Paul's facility, when it was never there. Phone GPS coordinates can confirm both my and Paul's locations at that time. It is believed that the magistrate received a call from Lackawanna court, and they won, again. Alleged gross and culpable negligence,

defamation, slander, fraud, emotional and financial distress, trauma, trespassing, kidnapping, and the wrongful death of Paul Jr.

15. **Moore Township Police:** On May 22, 2023, Moore Police came onto my property and took Paul under 4th amendment illegal search and seizure. I advised them they were violating Paul's civil and ADA rights and they took him anyway. 7 people. 2 Police, 3 universal employees, and the 2 Liberty HC employees. The invalid order was emailed to the police directly from the court and has no stamp or seal and it was Never filed after, nor was I ever served a proper stamped, filed copy. Alleged gross and culpable negligence, defamation, slander, fraud, emotional and financial distress, trauma, trespassing, kidnapping, and the wrongful death of Paul Jr.

16. All parties continue to ignore Paul's expressed wishes, despite his recovery, and continue to hold him under civil rights and ADA rights violations. No one upholds the laws for a disabled person. Pa. Disability rights is useless. Paul's son

laid in a morgue for four months, due to the guardianship abuse by FSA/Nancy Hudack. We were not allowed to tell him that his son "had passed". All while they had full knowledge of the J.Mchugh fraud scam, disclosed in court and to all authorities, repeatedly. They refuse to accept responsibility for their gross and culpable negligence and egregious errors and intentional infliction of stress, trauma, and emotional and financial distress upon us. They terrorized and tormented us, out of jurisdiction, and crossing county lines, with invalid and fraudulent orders and fraudulent petitions. It is the true stories of " I Care A Lot", and "Kids for Cash". Written complaint with evidence sent to the governor, and I received only a letter telling me to " get a lawyer". A lawyer can't fix court misconduct. To the AG, dozens of emailed, faxed, and mailed complaints, with evidence ALL went ignored by the AG. I allege they give protection to all Pa. courts, and now the AG defends the state entities against all allegations. They announced that they launched a new trafficking office, yet, the same week,

we were told to " stop bothering them", via an email. Dozens of the same complaints and evidence sent to the Middle District U. S. attorney went ignored. He is Also from Lackawanna county. If this lawsuit needs to be dismissed for any reason, it should be without prejudice. No one should be relieved of this egregious misconduct that has now caused a death. I have solicited over 100 attorneys, and they will not help us. We want this guardianship terminated, and we need the DOJ, the Supreme Court, or Pa. Disability Rights to help do it. All are now on notice about this statewide problem. Paul will TELL you what he wants. They are using Paul as a CASH COW! The Supreme Court has failed to correct the no due process, and misconduct. Paul's son would have been 26 years old on April 4, 2024. He will never have another birthday and Paul will never be a grandfather. Lackawanna County, court, and employees and all defendants took that away from us, under egregious and repetitive patterns of practice and misconduct. I demand \$200,000,000 dollars for damages under their gross and culpable negligence,

misconduct, fraud, intentional infliction of financial damages, loss of companionship, intentional infliction of emotional stress, torment, and trauma, and a wrongful death/manslaughter of Paul M Wolski Jr., while engaging in the described misconduct. I also demand the termination of the Lackawanna and FSA guardianship so we can all happily leave this dreadful state.

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