

**EISENBERG, ROTHWEILER,  
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<p>I.P. Philadelphia, Pennsylvania</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>THE GLEN MILLS SCHOOLS 185 Glen Mills Road Glen Mills, Pennsylvania 19342</p>	<p>COURT OF COMMON PLEAS PHILADELPHIA COUNTY</p> <p>JANUARY TERM, 2020</p> <p>NO.:</p> <p>JURY TRIAL DEMANDED</p>
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**NOTICE TO DEFEND**

**"NOTICE**

"You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

"YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE

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**"AVISO**

"Le han demandado a usted en la corte. Si, usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

"LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO. SI USTED NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO, ESTA OFICINA PUEDE PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN HONORARIO."

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**COMPLAINT- CIVIL ACTION  
PARTIES**

1. Defendant, The Glen Mills Schools ("Glen Mills"), is a Pennsylvania not-for-profit corporation with its principal place of business at 185 Glen Mills Road, Glen Mills, Pennsylvania 19342.

2. Plaintiff, I.P is an adult individual residing in Pennsylvania and is twenty-one years old at the time of this filing.

3. At all times material hereto, Plaintiff was adjudicated while a minor and sent to Glen Mills as a student and a resident.

4. Randy Ireson ("Ireson"), is an adult individual, who at all relevant times hereto, resided at 33 Threewood Drive #3, Glen Mills, Pennsylvania 19342.

5. At all times material hereto, Randy Ireson was employed as the Executive Director of Glen Mills and was acting within the course and scope of his employment.

6. At all times material hereto, Ireson was responsible for all aspects of the management and supervision of Glen Mills' day-to-day operations, including developing and/or implementing policies and procedures to prevent the abuse of juveniles in Glen Mills' care, and hiring, training and/or retaining Glen Mills' leadership and staff.

7. At all times material hereto, Glen Mills was responsible to have in place policies and procedures to ensure that the highest quality of service was delivered to the students/residents in Glen Mills' care, custody and/or control, including developing and/or implementing policies and procedures to prevent the abuse of juveniles in Glen Mills' care, custody and/or control.

8. At all times material hereto, the following adult individuals were actual, ostensible and/or apparent agents, servants and/or employees of Glen Mills and were counselors at Glen Mills who abused Plaintiff A.M:

- (a) Michael McVey ("McVey")
- (b) Raheem Orr ("Orr")

9. Furthermore, Plaintiff was abused by other individuals who were actual, apparent and/or ostensible agents, servants and/or employees of Glen Mills while Plaintiff was a resident at Glen Mills. I.P is unable at this time to identify them fully after having conducted a reasonable investigation with due diligence. To the best of I.P's recollection the following staff both sexually and/or physically abused Plaintiff: Mike from believed Madison hall, who is approximately 5'9, with red hair, Irish looking with a chubby build; a staff member named Tyson with possible last name Gelly; a Doctor/nurse at the Glen Mills medical building who was white, chubby, baldish with hair around the side of his head, white hair, no facial hair and glasses.

10. At all times material hereto, Plaintiff had a special relationship with the staff/counselors at Defendant Glen Mills.

11. At all relevant times, Defendant Glen Mills was acting by and through its actual, apparent, and/or ostensible agents, servants and/or employees acting within the course and scope of their employment, service and/or agency.

12. At all times material hereto, Defendant Glen Mills purposely established significant contacts in Pennsylvania and Philadelphia County, and carried out, and continues to carry out, substantial, continuous, and systematic business activities in Pennsylvania and Philadelphia County.

13. Upon information and belief, Glen Mills receives approximately \$52,000 per year in tuition for each juvenile from Philadelphia and generates approximately \$40 million in revenue from the placement of Philadelphia County juveniles at its facility. <sup>1</sup>

14. Upon information and belief, over one third of Glen Mills' juvenile placements come from the Philadelphia County juvenile justice system.

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<sup>1</sup> <https://www.philiv.com/crimeia/glen-mills-schools-pa-abuse-juvenile-investigation-20190220.html>

## BACKGROUND

15. Glen Mills serves as a custodial facility for the placement of court-adjudicated juveniles and juveniles at risk for truancy, delinquency or criminal conduct.

16. Glen Mills purportedly provides a rehabilitative based program for juvenile offenders and delinquent juveniles, and provides evidence-based programs such as "Positive Behavioral Intervention Supports, Moral Reconciliation and Coping with Anger" to turn its students away from crime.<sup>2</sup>

17. Glen Mills purports that the school employs a "Balanced and Restorative Justice (BARJ) compliant, residential program utilizing a Sociological Model, designed to effectuate long-term behavioral change and enhance life skills development."<sup>3</sup>

18. The Glen Mills' program includes "room and board, clothing, behavior management, individual and group counseling, academic and vocational programming, medical and dental services, as well as athletic and recreational opportunities."<sup>4</sup>

19. Glen Mills has received thousands of placements and commitments of juveniles from this Commonwealth and other states by virtue of its promise of a progressive and effective program, which includes education and instruction for delinquent children.<sup>5</sup>

20. Despite Glen Mills' advertised image, Glen Mills' leadership created and maintained a culture of fear and abuse, and ignored the medical and educational needs of its residents.

21. The juveniles placed at Glen Mills suffered systematic physical, sexual, and/or emotional abuse at the hands of Glen Mills' leadership and staff.

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<sup>2</sup> <http://www.glenmillsschool.org/admissions/regulatory-compliance/>

<sup>3</sup> <http://www.glenmillsschool.org/admissions/programs-offered/>

<sup>4</sup> <http://www.glenmillsschool.org/admissions/programs-offered/>

<sup>5</sup> <https://www.philiv.com/crimeia/glen-mills-schools-pa-abuse-juvenile-investigation-20190220.html>

22. The severe physical, sexual, and/or emotional abuse suffered by these juveniles was perpetuated by Glen Mills' leaderships' failure to properly train, retain, supervise and/or discipline its staff, as well as Glen Mills' leaderships' acceptance, acquiescence and perpetuation of a culture of abuse as a means of discipline for its students/residents.

23. As a result, Glen Mills' staff engaged in the severe physical, sexual, and emotional abuse of juveniles as a matter of practice and custom, knowing that their conduct would not be subject to discipline by Glen Mills and/or its' leadership.

24. The juveniles placed at Glen Mills also suffered severe physical, sexual, and emotional abuse at the hands of fellow residents at the school.

25. Glen Mills' leadership and staff routinely encouraged and forced Glen Mills' juveniles to fight each other.

26. Glen Mills and its leadership completely failed in its duty to provide education, treatment, supervision, rehabilitation and/or protection to the juveniles entrusted in its care.

#### **PLAINTIFF I.P.'s HORRIFIC TIME AT GLEN MILLS**

27. In, 2015 and 2017, Plaintiff I.P was adjudicated by the Philadelphia County Court System.

28. I.P was committed to the custody of Glen Mills pursuant to a contract between Philadelphia County and Glen Mills and upon information and belief, was a resident at Glen Mills from on or about May 2015 to February 2016 and again in November 2017 to October 2018.

29. When I.P arrived at Glen Mills, he was first assigned to Hayes hall in 2015 to 2016. He was assigned to Madison hall for 2017 to 2018.

30. Throughout the time Plaintiff resided and was a student at Glen Mills, he was subject to repeated and severe sexual abuse, rape, and violence by various staff members of Glen Mills as described herein.

31. Throughout the time Plaintiff resided and was a student at Glen Mills, he was subject to what became regular and routine sexual, physical, verbal and emotional abuse by various members of the staff as described herein. Some of the examples of the abuse Plaintiff was subjected to are described below.

32. When Plaintiff arrived in 2017, the 5'9 red haired staff member named Mike repeatedly raped and sexually abused Plaintiff while assigned to Madison hall.

33. The aforementioned staff member, Mike raped I.P on at least three occasions, anally, as well as forced him to have oral sex on several occasions. Mike threatened that he would kill I.P and cut him in pieces and send the pieces to I.P's mother if he did not obey him and have sex with him.

34. Mike would force I.P into different rooms in Madison hall, at night, and force him to have anal sex as well as oral sex.

35. Mike would also kiss I.P, massage his face, grab his penis, caress I.P's legs, force I.P to kiss him on the cheek and would force I.P to watch pornographic videos.

36. Mike would bring various drugs into Glen Mills, including Percocet and Oxycodone, and force I.P to consume them with him. Mike would provide him with copious amounts of pills, forcing I.P to take the drugs, which has caused Plaintiff to now become addicted to the aforementioned opioids.

37. Any time I.P tried to stop Mike's sexual assaults, Mike would threaten to kill him or threaten to remove his home passes and other outside communications.

38. I.P feared severe retribution if he told anyone of the rapes and sexual assaults.

39. I.P also believes, and therefore avers, that Mike destroyed or removed grades that I.P obtained at Defendant's school, forcing him to retake educational classes, delaying his ability to take and pass the G.E.D and obtain paid employment.

40. Mike forced I.P to confront another student for not going to the bathroom with a staff. I.P was forced to be in a back room with Mike and the other student. Mike was talking to the other student, looked over to I.P and then immediately mashed the students head into a wall throwing blood all over the room.

41. On I.P.'s first day in 2015, I.P was standing in line and slouched his shoulders. McVey came up to him, screamed at him for doing so, then in front other students, grabbed him around the neck and choked him until he became unconscious. I.P. was picked on by other students for the remainder of his first stay for being choked until he was unconscious. Plaintiff was also thrown through a table in the cafeteria by McVey.

42. During I.P.'s first stay in 2015 and 2016, I.P. had some blood in his stool and was sent to the aforementioned Doctor at the school's Medical center, which he did not want to see. The doctor forced I.P to have an anal exam for several minutes causing significant pain and continued bleeding for a week. The Doctor never provided I.P with the results and only gave Ibuprofen. I.P was brought back to this doctor approximately five times during 2015-2016 for random physicals, not associated with any sports, medical reason or activity. I.P would be forced to be examined by the doctor who would grab and touch his penis on those 5 occasions, without any other physical exam taking place.

43. Plaintiff was choked, punched and kicked by Tyson Gelly during a beating.

44. Plaintiff was thrown through a wall by Orr during a beating.

45. As a result of being routinely and systematically assaulted and abused by Glen Mills' staff, Plaintiff suffered severe physical and psychological injuries which required medical attention.

46. As a direct and proximate result of the brutal and violent rapes, sexual assaults and physical assaults and abuse by Glen Mills staff, Plaintiff has been permanently scarred both physically and mentally, by the abuses he sustained.



47. As a direct and proximate result of the brutal and violent rapes, sexual assaults and physical assaults and abuse by Glen Mills' staff, Plaintiff is, and continues to be, deeply traumatized by the persistent, severe and systematic physical and emotional abuse inflicted on him by Glen Mills' leadership and staff.

### **THE CULTURE OF ABUSE AT GLEN MILLS**

48. In December 2018, the Children's Rights and the Education Law Center-PA published a report titled *Unsafe and Uneducated: Indifference to Dangers in Pennsylvania's Residential Child Welfare Facilities*.

49. The report revealed that Glen Mills "not only has a large number of incidents of staff physical maltreatment but has refused access to PA-OHS staff and state police. A PA DHS's violation report noted that staff was "belligerent" and "aggressive" with PA-DHS staff and state police who were investigating allegations of child abuse.<sup>6</sup>

50. The report also documented repeated instances of physical abuse to juveniles by Glen Mills' staff including the use of severe physical violence.

51. In March 2019, the Philadelphia Inquirer reported that at least nine boys told the chief of the juvenile unit at the Defender Association of Philadelphia that "Glen Mills staffers encouraged Philadelphia students to sign pre-typed letters by falsely claiming their sentences would restart if they left Glen Mills for another program."<sup>7</sup>

52. Upon information and belief, for many years prior to the time when Plaintiff resided at Glen Mills, Defendant Glen Mills and its leadership knew and continued to perpetuate, encourage and accept a culture of violence and abuse, purportedly, to be used as a means of discipline for its residents.

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<sup>6</sup> <https://www.childrenrights.org/press-release/unsafe-and-uneducated-new-report-reveals-dangers-for-youth-in-pennsylvania-foster-care/>

<sup>7</sup> <https://www.philly.com/news/glen/mills-schools-pa-abuse-letter-philadelphia-pittsburgh-remove-students-investigation-20190302.html>

53. Further, in 2018, the Philadelphia Department of Human Services ("DHS") accepted a 'corrective action plan' from Glen Mills after its staff attacked a juvenile.

54. DHS identified the same sort of abusive conduct that has been reported in the media.

55. In response, Glen Mills informed DHS that it would make "significant changes to campus operations."<sup>8</sup>

56. By reason of the carelessness, negligence, gross negligence, outrageousness, conscious disregard, wantonness, recklessness and other liability producing conduct of Defendant, Plaintiff sustained conscious pain and suffering and fear of impending death, psychological, psychiatric, orthopedic and neurological injuries, and other severe and disabling injuries including but not limited to despair, despondency, anxiety, mental and emotional pain and suffering; great physical pain, suffering and the loss of life's pleasures, past, present and future; loss of earnings and wages and loss of earnings capacity, past, present and future; hospital, medical and rehabilitation expenses, including medical equipment, supplies and other medical care and treatment; other psychological, psychiatric, orthopedic and neurological injuries.

57. As a direct and proximate result of the conduct of Defendant, Plaintiff has in the past, continues to and will in the future suffer pain, disfigurement, increased loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on his ability to engage in normal pre-accident activities and pleasures of life, and other intangible losses.

58. As a direct and proximate result of the conduct of the Defendant, Plaintiff has been prevented and will be prevented in the future from performing his usual activities and avocations.

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<sup>8</sup> <https://www.philly.corninews/glen-mills-school-pa-abuse-letter-philadelphia-pittsburghremove-students-investigation-20190302.html>

**COUNT I - NEGLIGENCE**  
**PLAINTIFF v. GLEN MILLS**

59. Plaintiff incorporates all preceding paragraphs of this Complaint as though fully set forth herein.

60. Glen Mills owned, operated and controlled The Glen Mills Schools, its leadership and staff.

61. Glen Mills had a duty to establish and enforce policies and procedures to prevent juveniles under Glen Mills' care, custody and/or control from being abused, physically, sexually and/or emotionally, by its staff and/or by other residents at Glen Mills.

62. The School Executives including its Board of Directors, had a duty to oversee the operation of Glen Mills and ensure that policies and procedures were in place to prevent the widespread and systematic abuse of juveniles under Glen Mills' care.

63. Glen Mills, by and through its employees, servants, and actual, apparent and/or ostensible agents breached its duties and was careless, negligent, grossly negligent, reckless and/or outrageous, both generally and in the following specific respects:

- a. Failing to establish sufficient policies and procedures to prevent physical, sexual and emotional abuse of Glen Mills' residents by Glen Mills' staff;
- b. Exposing Plaintiff and countless other children to unreasonable danger by failing to enforce the policies and procedures that were in place;
- c. Failing to report instances of child abuse to the appropriate authorities;
- d. Failing to hire competent staff;
- e. Failing to properly train and/or supervise the staff at Glen Mills;
- f. Failing to detect a rampant and open culture of abuse of juveniles in Glen Mills' care;
- g. Failing to stop a rampant and open culture of abuse of juveniles in Glen Mills' care;

- h. Exposing Glen Mills' residents to widespread and systematic abuse over the course of decades and allowing, accepting, encouraging and perpetuating the abuse to purportedly be used as a form of discipline for its residents;
- i. Improperly handling past allegations of abuse;
- j. Threatening Glen Mills' residents with physical harm in an attempt to prevent them from reporting abuse;
- k. Failing to provide meaningful oversight of staff;
- l. Refusing to allow parents of Glen Mills' residents reasonable access to their children;
- m. Preventing Glen Mills' residents from seeking appropriate medical attention for the injuries caused to occur by Glen Mills' staff;
- n. Preventing Glen Mills' residents from honestly disclosing the causes of their injuries to medical personnel;
- o. Violating state standards for juvenile correctional facilities;
- p. Failing to warn Plaintiff or his parents of the peculiar, dangerous and/or unsafe conditions at Glen Mills;
- q. Failing to adopt, enact, employ and/or enforce proper and adequate safety procedures, programs and rules;
- r. Failing to properly supervise Glen Mills' leadership and staff;
- s. Exposing Plaintiff to peculiar and/or unreasonable danger;
- t. Failing to terminate employees who abused children; and
- u. Failing to terminate employees who allowed staff to abuse children.

64. By conducting itself as described above, Glen Mills' acts and/or omissions were a substantial factor, a factual cause and/or increased the risk of harm of Plaintiff's severe physical and emotional injuries.

**WHEREFORE**, Plaintiff I.P. demands judgment against Glen Mills in an amount in excess of Fifty Thousand Dollars (\$50,000.00) in compensatory damages, punitive damages, delay damages, prejudgment interest, costs of suit and attorney's fees, and other such relief as the Court may deem appropriate.

**COUNT II - NEGLIGENCE PER SE**  
**PLAINTIFF v. GLEN MILLS**

65. Plaintiff incorporates all preceding paragraphs of this Complaint as though fully set forth herein.

66. Glen Mills is funded in large part by the Commonwealth of Pennsylvania and other government jurisdictions to provide services mandated by state law for children who have been adjudicated delinquent in juvenile court.

67. As a facility for delinquent juveniles, Glen Mills is subject to the provisions of the Pennsylvania Juvenile Justice Act, 42 Pa.C.S. §§ 6301 et seq. (the "Act").

68. Section 6327(a) of the Act provides: "under no circumstances shall a child be detained... where the child is apt to be abused by other children." 42 Pa.C.S. § 6327(a).

69. As alleged above, Glen Mills' leadership and staff regularly forced and/or encouraged its residents to fight one another.

70. As a result of Glen Mills' conduct, Plaintiff was regularly attacked by other residents.

71. Glen Mills violated Section 6327(a) of the Act by allowing, forcing and/or encouraging conditions where children were apt to be abused by other children.

72. As a direct result of Glen Mills' violation of Section 6327(a) of the Act, Plaintiff suffered severe physical and emotional injuries.

**WHEREFORE**, Plaintiff I.P. demands judgment against Glen Mills in an amount in excess of Fifty Thousand Dollars (\$50,000.00) in compensatory damages, punitive damages, delay damages, prejudgment interest, costs of suit and attorney's fees, and other such relief as the Court may deem appropriate.

**COUNT III - NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS**  
**PLAINTIFF v. GLEN MILLS**

73. Plaintiff incorporates all preceding paragraphs of this Complaint as though fully set forth herein.

74. While in Defendant's care, custody and/or control, Defendant had a contractual and/or fiduciary duty of care to Plaintiff.

75. Defendant breached its duty to Plaintiff by failing to provide a safe environment for Plaintiff while at Glen Mills.

76. McVery, Orr, and other identified employees, agents, and/or servants of Defendant Glen Mills' conduct in abusing Plaintiff was extreme and outrageous.

77. Defendant's employees, agents, and/or servants' actions as stated herein were done with a conscious disregard for the safety and well-being of Plaintiff and caused severe emotional distress to Plaintiff.

78. As stated herein, Plaintiff suffered depression, anxiety, difficulty sleeping, flashbacks, Post Traumatic Stress Disorder, and/or other severe physical manifestations of emotional distress due to Defendant's actions and/or inactions.

79. Defendant's conduct, by and through its agents, actual and/or ostensible, servants and/or employees was the proximate cause of Plaintiff's severe emotional distress.

**WHEREFORE**, Plaintiff I.P. demands judgment against Glen Mills in an amount in excess of Fifty Thousand Dollars (\$50,000.00) in compensatory damages, punitive damages, delay damages, prejudgment interest, costs of suit and attorney's fees, and other such relief as the Court may deem appropriate.

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BY: s/Matthew L. Solomon  
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JEFFREY B. SOLOMON, ESQUIRE  
Attorneys for Plaintiff

Date: 1/6/20

**VERIFICATION**

The undersigned, having read the attached pleading verifies that the within pleading is based on information furnished to counsel, which information has been gathered by counsel in the course of this lawsuit. Signer verifies that he has read the within pleading and that it is true and correct to the best of the signer's knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

I.P.

\_\_\_\_\_  
I.P.

DATE: 1-7-20