

TEMPORARY PROTECTION
FROM ABUSE ORDER

Amended Order Continued Order

IN THE COURT OF COMMON PLEAS OF Wayne COUNTY, PENNSYLVANIA
NO. 220-2022 DR

PLAINTIFF

Jaime Daniels 6/24/1983
First Middle Last Suffix Plaintiff DOB

Name(s) of All protected persons, including minor child/ren and DOB.

Jaime Daniels June 24, 1983

V.

DEFENDANT

Theodore Daniels
First Middle Last Suffix

Defendant's Address:

939 Westwood Drive
Lake Ariel Pennsylvania 18436

DEFENDANT IDENTIFIERS			
DOB	2/3/1975	HEIGHT	6 ft. 4 in.
SEX	Male	WEIGHT	360
RACE	White	EYES	Blue
HAIR	Unknown or Completely Bald		
SSN			
DRIVERS LICENSE #			
EXP DATE		STATE	Pennsylvania

CAUTION:

- Weapon Involved
- Weapon Present on the Property
- Weapon Ordered Relinquished

The Court hereby Finds: That it has jurisdiction over the parties and subject matter, and Defendant will be provided with reasonable notice and opportunity to be heard.

The Court hereby Orders:

- Defendant shall not abuse, harass, stalk, threaten, or attempt or threaten to use physical force against any of the above persons in any place where they might be found.
- Except for such contact with the minor child/ren as may be permitted under Paragraph 5 of this order, Defendant shall not contact Plaintiff, or any other person protected under this order, by telephone or by any other means, including through third persons.
- Additional findings of this order are set forth below.

Order Effective Date April 26, 2022 Order Expiration Date UNTIL OTHERWISE MODIFIED OR TERMINATED BY THIS COURT

NOTICE TO DEFENDANT

Defendant is hereby notified that failure to obey this order may result in arrest as set forth in 23 Pa.C.S. § 6113 and that violation of the order may result in charge of indirect criminal contempt as set forth in 23 Pa.C.S. § 6114. Consent of Plaintiff to Defendant's return to the residence shall not invalidate this order, which can only be changed or modified through the filing of appropriate court papers for that purpose. 23 Pa.C.S. § 6108 (g). If Defendant is required to relinquish any firearms, other weapons, ammunition, or any firearm license, those items must be relinquished to the sheriff or the appropriate law enforcement agency within 24 hours of the service of this order. As an alternative, Defendant may relinquish any firearm, other weapon or ammunition listed herein to a third party provided Defendant and the third party first comply with all requirements to obtain a safekeeping permit. If, due to their current location, firearms, other weapons, or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide an affidavit to the sheriff or the appropriate law enforcement agency listing the firearms, other weapons, or ammunition and their current location no later than 24 hours after the service of this order. Defendant is further notified that violation of this order may subject him/her to state charges and penalties under the Pennsylvania Crimes Code under 18 Pa.C.S. § 6105 and to federal criminal charges and penalties under 18 U.S.C. § 922(g)(8) and the Violence Against Women Act, 18 U.S.C. § 2261-2262.

REMOVED FROM
THE RECORD
APR 28 2022
EDWARD W. BENTLEY, PROCK
PROTHONOTARY & CLERK

2022 APR 26 AM 11:30
PROTHONOTARY AND
CLERK OF COURTS
WAYNE COUNTY, PA

AND NOW, on 26th Day of April, 2022, in consideration of the attached Petition for Protection from Abuse, the court hereby enters the following Temporary Order:

Plaintiff's request for a temporary protection order is granted.

1. Defendant shall not abuse, harass, stalk, threaten, or attempt or threaten to use physical force against any of the above persons in any place where they might be found.
2. Defendant is evicted and excluded from the residence at:
**The Hideout Clubhouse and
939 Westwood Drive, Lake Ariel, PA 18436**
or any other permanent or temporary residence where Plaintiff or any other person protected under this order may live. Plaintiff is granted exclusive possession of the residence. Defendant shall have no right or privilege to enter or be present on the premises of Plaintiff or any other person protected under this order.
3. Except for such contact with the minor children as may be permitted under paragraph 5 of this order, Defendant is prohibited from having **ANY CONTACT** with Plaintiff, or any other person protected under this order either directly or indirectly, at any location, including but not limited to any contact at Plaintiff's or other protected party's school, business, or place of employment.
4. Except for such contact with the minor child/ren as may be permitted under paragraph 5 of this order, Defendant shall not contact Plaintiff, or any other person protected under this order, by telephone or by any other means, including through third persons.
5. CUSTODY

Pending the outcome of the final hearing in this matter, Plaintiff is awarded temporary custody of the following minor child/ren:

- **[REDACTED] Daniels**

The local law enforcement agency in the jurisdiction where the child/ren are located shall ensure that the child/ren are placed in the care and control of Plaintiff in accordance with the terms of this order.

6. FIREARMS, OTHER WEAPONS, OR AMMUNITION RESTRICTIONS

Defendant is prohibited from possessing or acquiring any firearms for the duration of this order.

Defendant is directed to relinquish to the sheriff or the appropriate law enforcement agency any firearm, other weapon, or ammunition listed in Attachment A to Temporary Order, which is incorporated herein by reference, under Defendant's control or in Defendant's possession.

Defendant may relinquish any firearms, other weapons, or ammunition to the sheriff or the appropriate law enforcement agency. As an alternative, Defendant may relinquish firearms, other weapons, or ammunition to a third party provided Defendant and the third party first comply with all the requirements to obtain a safekeeping permit. Defendant must relinquish any firearm, other weapon, ammunition, or firearm license ordered to be relinquished no later than 24 hours after service of this order. If, due to their current location, firearms, other weapons, or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide to the sheriff or the appropriate law enforcement agency an affidavit listing the firearms, other weapons, or ammunition and their current location no later than 24 hours after service of this order. Failure to timely relinquish any firearm, other weapon, ammunition, or any firearm license shall result in a violation of this order and may result in criminal conviction under the Uniform Firearms Act, 18 Pa.C.S. §6105.

7. The following additional relief is granted:

Defendant is prohibited from stalking, as defined in 18 Pa.C.S. § 2709.1, or harrassing, as described in 18 Pa.C.S. § 2709, the following family and household members of Plaintiff:

Name	Relationship	Address
[REDACTED] Daniels	Child	

Other Relief:

Defendant shall provide Plaintiff and/or minor child/ren with other suitable housing.(to be determined at hearing)

Defendant is ordered to pay the costs of this action, including filing and service fees.(to be determined at hearing)

Defendant is ordered to pay Plaintiff's reasonable attorney's fees.(to be determined at hearing)

8. The Pennsylvania State Police, the municipal police, or the sheriff shall accompany Plaintiff to his or her residence to retrieve personal belongings or accompany Plaintiff while the petition or order is served on Defendant.
9. A certified copy of this order shall be provided to the sheriff or police department where Plaintiff resides and any other agency specified here after:
HONESTDALE STATE POLICE, WAYNE COUNTY SHERIFF
10. The sheriff, police or other law enforcement agencies are directed to serve Defendant with a copy of the petition, any order issued, and the order for hearing. Petitioner will inform the designated authority of any addresses, other than Defendant's residence, where Defendant can be served.
11. THIS ORDER APPLIES IMMEDIATELY TO DEFENDANT AND SHALL REMAIN IN EFFECT UNTIL OTHERWISE MODIFIED OR TERMINATED BY THIS COURT AFTER NOTICE AND HEARING.

NOTICE TO DEFENDANT

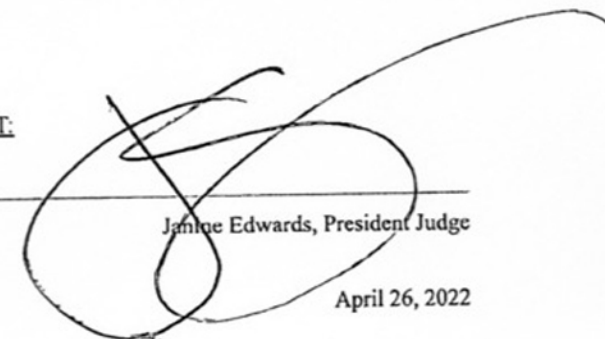
Defendant is hereby notified that failure to obey this order may result in arrest as set forth in 23 Pa.C.S. § 6113, and that violation of the order may result in charge of indirect criminal contempt as set forth in 23 Pa.C.S. § 6114. Consent of Plaintiff to Defendant's return to the residence shall **not** invalidate this order, which can only be changed or modified through the filing of appropriate court papers for that purpose. 23 Pa.C.S. § 6108 (g). If Defendant is required to relinquish any firearms, other weapons, ammunition, or any firearm license, those items must be relinquished to the sheriff or the appropriate law enforcement agency within 24 hours of the service of this order. As an alternative, Defendant may relinquish any firearm, other weapon, or ammunition listed herein to a third party provided Defendant and the third party first comply with all requirements to obtain a safekeeping permit. If, due to their current location, firearms, other weapons, or ammunition cannot reasonably be retrieved within the time for relinquishment, Defendant shall provide an affidavit to the sheriff or the appropriate law enforcement agency listing the firearms, other weapons, or ammunition and their current location no later than 24 hours after the service of this order. Defendant is further notified that violation of this order may subject him/her to state charges and penalties under the Pennsylvania Crimes Code under 18 Pa.C.S. § 6105 and to federal criminal charges and penalties under 18 U.S.C. § 922(g)(8) and the Violence Against Women Act, 18 U.S.C. § § 2261-2262.

NOTICE TO SHERIFF, POLICE AND LAW ENFORCEMENT OFFICIALS

This order shall be enforced by the police department or sheriff who has jurisdiction over Plaintiff's residence OR any location where a violation of this order occurs OR where Defendant may be located. If Defendant violates Paragraphs 1 through 6 of this order, Defendant shall be arrested on the charge of indirect criminal contempt. An arrest for violation of this order may be made without warrant, based solely on probable cause, whether or not the violation is committed in the presence of a police officer or sheriff.

Subsequent to an arrest, the law enforcement officer or sheriff shall seize all firearms, other weapons, or ammunition in Defendant's possession which were used or threatened to be used during the violation of the protection order or during prior incidents of abuse and any other firearms in Defendant's possession. Any firearm, other weapon, ammunition, or any firearm license must be delivered to the sheriff or the appropriate law enforcement agency, which sheriff or agency shall maintain possession of the firearms, other weapons, or ammunition until further order of this court, unless the weapon(s) are evidence of a crime, in which case, they shall remain with the law enforcement agency whose officer or sheriff made the arrest.

BY THE COURT:


Janine Edwards, President Judge

April 26, 2022

Jaime Daniels

Plaintiff

v.

Theodore V Daniels

Defendant

: IN THE COURT OF COMMON PLEAS OF
: THE TWENTY SECOND JUDICIAL
: DISTRICT
: COMMONWEALTH OF PENNSYLVANIA
: WAYNE COUNTY BRANCH

: No. 220-2022 DR

NOTICE OF HEARING AND ORDER

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claim set forth in the following papers, you must appear at the hearing scheduled herein. If you fail to do so, the case may proceed against you and a FINAL order may be entered against you granting the relief requested in the petition. In particular, you may be evicted from your residence, be prohibited from possessing any firearm, other weapon, ammunition, or any firearm license, and lose other important rights, including custody of your children. A protection order granted by a court may be considered in subsequent proceedings under Title 23 (Domestic Relations) of the Pennsylvania Consolidated Statutes, including child custody proceedings under Chapter 53 (relating to custody) and Child Protective Services Law proceedings under Chapter 63 (related to juvenile matters).

A hearing on the matter is scheduled for the 6th day of May 2022 at 9:00 A.M. in Courtroom Historic 3rd Floor at Wayne County, Honesdale, PA.

If an order of protection has been entered, you MUST obey the order until it is modified or terminated by the court after notice and hearing. If you disobey this order, the police or sheriff may arrest you as set forth in 23 Pa.C.S. § 6113. Violation of this order may subject you to a charge of indirect criminal contempt as set forth in 23 Pa.C.S. § 6114. Violation may also subject you to prosecution and criminal penalties under the Pennsylvania Crimes Code. Under federal law, 18 U.S.C. § 2265, this order is enforceable anywhere in the United States, tribal lands, U.S. Territories and the Commonwealth of Puerto Rico. If you travel outside of the state and intentionally violate this order, you may be subject to federal criminal proceedings under the Violence Against Women Act. 18 U.S.C. §§ 2261-2262.

If this order directs you to relinquish any firearm, other weapon, ammunition, or any firearm license to the sheriff or the appropriate law enforcement agency, you may do so upon service of this order. As an alternative, you may relinquish any firearm, other weapon, or ammunition listed herein to a third party provided you and the third party first comply with all requirements to obtain a safekeeping permit. 23 Pa.C.S. § 6108.3. You must relinquish any firearm, other weapon, ammunition, or any firearm license listed in the order no later than 24 hours after service of the order. If, due to their current location, firearms, other weapons or ammunition cannot reasonably be retrieved within the time for relinquishment, you must provide an affidavit to the sheriff or the appropriate law enforcement agency listing the firearms, other weapons, or ammunition and their current location no later than 24 hours after service of the order. Failure to timely relinquish any firearm, other weapon, ammunition, or any firearm license shall result in a violation of this order and may result in criminal conviction under the Uniform Firearms Act, 18 Pa.C.S. § 6105.

NOTICE: Even if this order does not direct you to relinquish firearms, you may be subject to federal firearms prohibitions and federal criminal penalties under 18 U.S.C. § 922(g)(8) or state firearms prohibitions and state criminal penalties under 18 Pa.C.S. § 6105.

YOU HAVE THE RIGHT TO HAVE A LAWYER REPRESENT YOU AT THE HEARING, HOWEVER, THE COURT WILL NOT APPOINT A LAWYER FOR YOU. YOU HAVE THE RIGHT TO PRESENT EVIDENCE AT THE HEARING, INCLUDING SUBPOENAING WITNESSES TO TESTIFY ON YOUR BEHALF.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. 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. IF YOU CANNOT FIND A LAWYER, YOU MAY HAVE TO PROCEED WITHOUT ONE.

PETITION FOR PROTECTION FROM ABUSE

IN THE COURT OF COMMON PLEAS OF Wayne COUNTY, PENNSYLVANIA
NO. 220-2022 DR

1. PLAINTIFF

Jaime Daniels **June 24, 1983**
First Middle Last Suffix Plaintiff DOB

Plaintiff's Address:

Plaintiff's address is confidential or Plaintiff's address is:
[REDACTED] 939 Westwood Drive, Lake Ariel, Pennsylvania 18436

V.

2. DEFENDANT

Theodore Daniels
First Middle Last Suffix

Defendant's Address:

[REDACTED]
939 Westwood Drive
Lake Ariel Pennsylvania 18436

DEFENDANT IDENTIFIERS			
DOB	2/3/1975	HEIGHT	6 ft. 4 in.
SEX	Male	WEIGHT	360
RACE	White	EYES	Blue
HAIR	Unknown or Completely Bald		
SSN			
DRIVERS LICENSE #			
EXP DATE		STATE	Pennsylvania

CAUTION:

- Weapon Involved
- Weapon Present on the Property
- Weapon Ordered Relinquished

Defendant's place of employment is: **Social Security Disability**

Check here if you have reason to believe that Defendant is a licensed firearms dealer, employed by a licensed firearms dealer or manufacturer; employed as a writer, researcher, or technician in the firearms or hunting industry, or is required to carry a firearm as a condition of employment.

3. I am filing this Petition on behalf of: Myself or Another Person

If you checked "myself", please answer all questions referring to yourself as "Plaintiff". If you ONLY checked "another person", please answer all questions referring to that person as the "Plaintiff", and provide your name and address here, as filer, unless confidential.

Filer's Name:

[REDACTED]
First Middle Last Suffix

Filer's address is confidential or Filer's address is:

If you checked "Another Person", indicate your relationship with Plaintiff:

- Parent of Minor Plaintiff(s)
- Applicant for appointment as guardian ad litem of minor Plaintiff(s)
- Adult household member with minor Plaintiff(s)
- Court-appointed guardian of incompetent Plaintiff(s)

4. Name(s) of all persons, including minor child/ren, who seek protection from abuse.

Jaime Daniels

Jack George Daniels

5. Indicate the relationship between Plaintiff and Defendant:

Spouse or Former Spouse of Defendant

Parent of a Child with Defendant

Defendant is an adult.

6. Defendant has been involved in a criminal court action.

- It is unknown if the Defendant has or has not been determined to be a perpetrator.

7. Plaintiff and Defendant are the parents of the following minor child/ren:

a. [REDACTED] Daniels

Age: 4

Child's address is: , 939 Westwood Drive , Lake Ariel , Pennsylvania , 18436

8. Plaintiff is seeking an order of child custody as part of this petition.

The following is a list of the children and where they have lived for the past 5 years:

a. [REDACTED] Daniels For the past 5 years, this child has lived with:

With both parents

939 Westwood Drive, Lake Ariel, PA

and Coatsville, PA

9. The facts of the most recent incident of abuse are as follows:

On about Sunday, April 24, 2022 at approximately 12:00 AM

location: 939 Westwood Drive, Lake Ariel, PA

See attached sheet.

10. Prior incidents of abuse that Defendant has committed against Plaintiff or the minor child/ren, (including any threats, injuries, or incidents of stalking) are as follows:

On 8/4/21, Defendant grabbed me by the front of my shirt and pulled me to his face and said "Don't you ever speak to me like that".

Threatened to kill family dog in front of children.

11. (a) Has Defendant used or threatened to use any firearms or other weapons against Plaintiff or the minor child/ren?

NO

(b) Other than the firearms, other weapons, or ammunition Defendant used or threatened to use against Plaintiff or the minor child/ren, does Defendant, to the best of your knowledge or belief, own or possess any additional firearm, other weapon, ammunition, or any firearm license?

YES

(c) If the answer to (b) above is "Yes", list any additional firearm, other weapon, or ammunition owned by or in the possession of Defendant on Attachment A to Petition, which is incorporated by reference into this petition.

(d) Plaintiff DOES request that the court order Defendant to relinquish firearms, other weapons, or ammunition listed on Attachment A to Petition. See Attachment A to Petition, for a list of firearms, other weapons, or ammunition Plaintiff requests the court to order Defendant to relinquish.

12. The sheriff, police department, or law enforcement agency that should be provided with a copy of the protection order are:

PA State Police

Wayne County Sheriff

13. There is an immediate and present danger of further abuse from Defendant.

14. Plaintiff is asking the court to evict and exclude Defendant from the following residence:

Plaintiff is asking the court to evict and exclude Defendant from the following residence:

The Hideout Clubhouse and

939 Westwood Drive, Lake Ariel, PA 18436

Owned By:

Defendant

#11

The PA State Troopers came to our home on Sunday, April 24, 2022 to do a wellness check. After they left Ted became very agitated about who called the State Troopers and accused my family of talking to Rolling Stone about his prior domestic violence and prior PFAs. He falsely accused me of talking to Rolling Stone. He was verbally abusive and I called State Police. They came out and suggested that he go somewhere that night "to cool things down" and suggested I get a PFA.

He showed up Monday morning at about 6:00 AM. He wanted to come in and I said didn't the police say to stay away. He texted me that I can't lock him out so I let him in. He asked if I was going to file a PFA and I started crying. I started to go to the Court House and he tried not to let me go. I got

in my car and saw a State Trooper. and I turned around to talk to him. I said I was headed to the Court House and the Trooper said "That's a good idea." Ted followed me to the Court House ^{and came into Court House where I came to get the} He stalks me at work ^{at work} screaming at me making me cry. He cursed at me continuously and our son repeats it to me. He has constantly said he would throw myself and our son out of the house and if he lost the campaign I wouldn't have a place to live in 3 weeks. He ^{is always saying at me which causes me to have} He had numerous guns, ^{Price also} knives and ammunition in the house and has loaded weapons where our son could access them. He prevents me from visiting my family and told me I couldn't go to family funeral. He curses at me and our son telling our son to "Shut the Fuck Up." He threatens to kick his ass and that he needs "an ass whooping." Our son repeats all of this.

He gave alcohol to his son,
GD, age 12 who said he was
drunk and his mother will not
allow Ted to have any
custody of GD since that incident.

Ted's Campaign Manager has
called me twelve (12) times
to persuade me not to file
this PFA. He has threatened
to investigate who made
wellness calls to State Police
unless I dropped the Emergency
PFA + didn't file a Temporary
PFA.

I am afraid of him and
what he will do to me and
our son. He threatens to kill
himself and has 2 suicidal
attempts before resulting in
hospitalizations in Wilkes
Barre and Colorado.

15. FOR THE REASONS SET FORTH ABOVE, I REQUEST THAT THE COURT ENTER A TEMPORARY ORDER, and AFTER HEARING, A FINAL ORDER THAT WOULD DO THE FOLLOWING:

- a. Restrain Defendant from abusing, harassing, stalking, threatening, or attempting or threatening to use physical force against Plaintiff or the minor child/ren in any place where Plaintiff or the child/ren may be found.
- b. Evict/exclude Defendant from Plaintiff's residence and prohibit Defendant from attempting to enter any temporary or permanent residence of Plaintiff.
- c. Require Defendant to provide Plaintiff or the minor child/ren with other suitable housing.
- d. Award Plaintiff temporary custody of the minor child/ren and place the following restrictions on contact between Defendant and the child/ren:
- e. Prohibit Defendant from having any contact with Plaintiff or the minor child/ren, in person, by telephone, or in writing, personally or through third persons, including but not limited to any contact at Plaintiff's school, business, or place of employment, except as the court may find necessary with respect to partial custody with the minor child/ren.
- f. Prohibit Defendant from having any contact with Plaintiff's relatives and Plaintiff's children listed in this petition, except as the court may find necessary with respect to partial custody with the minor child/ren.

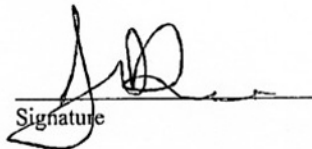
The following persons are Plaintiff's relatives or family and household members that Plaintiff believes require protection from stalking and harassment by Defendant.

Name	Relationship	Address
[REDACTED]	Daniels	Child

- g. Order Defendant to temporarily relinquish the firearms, other weapons, or ammunition listed on Attachment A to Petition, under Defendant's control, or in Defendant's possession, or any firearm license to the sheriff or the appropriate law enforcement agency.
- h. Prohibit Defendant from acquiring or possessing firearms for the duration of the order.
- i. Order Defendant to pay the costs of this action, including filing and service fees.
- j. Order Defendant to pay Plaintiff's reasonable attorney's fees.
- k. Grant such other relief as Plaintiff requests or the court deems appropriate.
- l. Order the police, sheriff, or other law enforcement agency to serve Defendant with a copy of this petition, any order issued, and the order for hearing. Plaintiff will inform the designated authority of any addresses, other than Defendant's residence, where Defendant can be served.
- m. Direct the Pennsylvania State Police, the municipal police, or the sheriff to accompany Plaintiff to his or her residence to retrieve personal belongings or accompany Plaintiff while the petition or order is served on Defendant, if Plaintiff has reason to believe his or her safety is at risk.

VERIFICATION

I verify that I am the petitioner as designated in the present action and that the facts and statements contained in the above petition are true and correct to the best of my knowledge. I understand that any false statements are made subject to the Penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities


Signature

04/26/22
Date

PFAD # JB008769074R