

**EXHIBIT A**

FCA §§ 1035, 1036,1055  
Summons-Child Neglect Proceeding)  
FAMILY COURT OF THE STATE OF NEW YORK  
COUNTY OF ORANGE

Form 10-7c  
9/2006

.....  
IN THE MATTER OF

SUMMONS  
(CHILD NEGLECT CASE)

 TEITELBAUM  
 TEITELBAUM

CHILDREN UNDER EIGHTEEN YEARS OF AGE  
ALLEGED TO BE NEGLECTED BY

DOCKET NO.: NN- 2127/2128-10  
FF NO.: 55083

MIRIAM TEITELBAUM  
JACOB TEITELBAUM

RESPONDENTS

.....  
**NOTICE: PLACEMENT OF YOUR CHILDREN IN FOSTER CARE MAY RESULT IN YOUR LOSS OF YOUR RIGHTS TO YOUR CHILDREN. IF YOUR CHILDREN STAY IN FOSTER CARE FOR 15 OF THE MOST RECENT 22 MONTHS, THE AGENCY MAY BE REQUIRED BY LAW TO FILE A PETITION TO TERMINATE YOUR PARENTAL RIGHTS AND TO COMMIT GUARDIANSHIP AND CUSTODY OF YOUR CHILDREN TO THE AGENCY FOR THE PURPOSES OF ADOPTION. IN SOME CASES, THE AGENCY MAY FILE BEFORE THE END OF THE 15-MONTH PERIOD. IF SEVERE OR REPEATED CHILD ABUSE IS PROVEN BY CLEAR AND CONVINCING EVIDENCE, THIS FINDING MAY CONSTITUTE THE BASIS TO TERMINATE YOUR PARENTAL RIGHTS AND TO COMMIT GUARDIANSHIP AND CUSTODY OF YOUR CHILDREN TO THE AGENCY FOR THE PURPOSES OF ADOPTION.**

BY ORDER OF THE FAMILY COURT OF THE STATE OF NEW YORK

TO THE ABOVE-NAMED RESPONDENT: **JACOB TEITELBAUM**, WHO RESIDES OR IS FOUND AT: **20 GETZEL BERGER BLVD., APT. 104, MONROE, NY 10950**

A Petition under Article 10 of the Family Court Act having been filed with this Court, and annexed hereto

YOU AND EACH OF YOU ARE HEREBY SUMMONED to appear before this Court at Orange County Courthouse, 285 Main Street, Goshen, New York on April 29, 2010 at 9:15 o'clock in the ~~morning~~ afternoon of that day to answer the petition and to be dealt with in accordance with Article 10 of the Family Court Act.

On your failure to appear as herein directed, a warrant may be issued for your arrest.

DATED: April 28, 2010  
PART: AB  
ACA: STEPHANIE BAZILE, ESQ.  
LAW GUARDIAN: *CL*  
C/W: CHRISTINE BRUNET

ELIZABETH C. HOLBROOK, Clerk of Court

FCA §§ 1035, 1036,1055  
Summons-Child Neglect Proceeding)  
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BY ORDER OF THE FAMILY COURT OF THE STATE OF NEW YORK

TO THE ABOVE-NAMED RESPONDENT: **MIRIAM TEITELBAUM**, WHO RESIDES OR IS FOUND AT: **c/o NEW YORK PRESBYTERIAN HOSPITAL, 21 BLOOMINGDALE ROAD, WHITE PLAINS, NY 10605 OR: 20 GETZEL BERGER BLVD., APT. 104, MONROE, NY 10950**

A Petition under Article 10 of the Family Court Act having been filed with this Court, and annexed hereto

YOU AND EACH OF YOU ARE HEREBY SUMMONED to appear before this Court at Orange County Courthouse, 285 Main Street, Goshen, New York on 2010 at \_\_\_\_\_ o'clock in the ~~morning~~ afternoon of that day to answer the petition and to be dealt with in accordance with Article 10 of the Family Court Act.

On your failure to appear as herein directed, a warrant may be issued for your arrest.

DATED: April 28, 2010  
PART: AB  
ACA: STEPHANIE BAZILE, ESQ.  
LAW GUARDIAN: *CRS*  
C/W: CHRISTINE BRUNET

ELIZABETH C. HOLBROOK, Clerk of Court

F.C.A. §§ 1012, 1031  
(Child Protective Petition -- Neglect)  
FAMILY COURT OF NEW YORK  
COUNTY OF ORANGE

Form 10-6  
(9/2006)

.....  
IN THE MATTER OF

PETITION  
(Child Neglect)

██████████ TEITELBAUM  
██████████ TEITELBAUM

DOCKET NO.: NN-  
FF NO.:

CHILDREN UNDER EIGHTEEN YEARS OF AGE  
ALLEGED TO BE NEGLECTED BY

MIRIAM TEITELBAUM  
JACOB TEITELBAUM

RESPONDENTS

.....  
**NOTICE: IF YOUR CHILDREN ARE PLACED IN FOSTER CARE, YOU MAY LOSE YOUR RIGHTS TO YOUR CHILDREN AND YOUR CHILDREN MAY BE ADOPTED WITHOUT YOUR CONSENT.**

**IF YOUR CHILDREN STAY IN FOSTER CARE FOR 15 OF THE MOST RECENT 22 MONTHS, THE AGENCY MAY BE REQUIRED BY LAW TO FILE A PETITION TO TERMINATE YOUR PARENTAL RIGHTS AND MAY FILE BEFORE THE END OF THE 15-MONTH PERIOD.**

TO THE FAMILY COURT:

The undersigned Petitioner respectfully alleges that:

1. Petitioner, the Orange County Department of Social Services, is a:  
 duly authorized agency having its office and place of business at Box Z, Quarry Road, Goshen, New York 10924.

2. The children who are the subject of this proceeding are:

<u>Name</u>	<u>Sex</u>	<u>Date of Birth</u>	<u>Custodial Parent/Guardian</u>	<u>Child's Address</u>
██████████ Teitelbaum	M	██████████	Miriam Teitelbaum Jacob Teitelbaum	c/o Katz 3 Hayes Court Monroe, NY 10950
██████████ Teitelbaum	M	██████████	Miriam Teitelbaum Jacob Teitelbaum	c/o Rubenstein 3 Iron Hill Plaza, #201 Monroe, NY 10950

3a. Upon information and belief, the father and mother of the children and their respective residence addresses are:

<u>Name of Child</u>	<u>Name of Parent</u>	<u>Parent's Address</u>
[REDACTED] Teitelbaum	Miriam Teitelbaum Jacob Teitelbaum	c/o New York Presbyterian Hospital 21 Bloomingdale Road White Plains, NY 10605 OR: 20 Getzel Berger Blvd., Apt. 104 Monroe, NY 10950
[REDACTED] Teitelbaum	Miriam Teitelbaum Jacob Teitelbaum	20 Getzel Berger Blvd., Apt. 104 Monroe, NY 10950

b. Upon information and belief, the persons legally responsible for the care of said children are: Miriam Teitelbaum and Jacob Teitelbaum, who reside at the above-stated address.

4. Upon information and belief, the children are neglected children on the following grounds and based upon the following facts:

Upon information and belief, the Respondent mother suffers from mental illness which renders her incapable of providing adequate guardianship and supervision to the subject children. Upon information and belief, the Respondent mother is currently hospitalized at New York Presbyterian Hospital for psychiatric treatment.

Upon information and belief, the Respondent father fails to provide adequate guardianship to the subject children in that in or about April 2010, the subject child, [REDACTED], age [REDACTED], ingested Children's Tylenol that the Respondent father left improperly closed within the child's reach. When asked how the child got the medication, the Respondent father merely replied, that he had given the subject child, [REDACTED], age nine (9) months the medication and that [REDACTED] somehow got it."

Furthermore, upon information and belief, on or about April 14, 2010, the Respondents' neighbors went to the Respondents' home upon hearing the sound of children crying. The children were found alone in the home. The neighbors took the children to their home as the Respondents whereabouts were unknown. ~~The Respondent father did not begin looking for the children until approximately two hours later.~~

Individuals within the community expressed their concerns regarding the children's safety and the Respondents' inability to properly care for and provide adequate guardianship and supervision and a safety plan was developed with the Respondents whereby the children would stay with relatives and neighbors. On or about April 27, 2010, the Respondent father demanded the return of the children and refused to continue with the current safety plan or devise another safety plan for the children.

Based upon the foregoing the subject children should be adjudged neglected children, neglected by the Respondents, Miriam Teitelbaum and Jacob Teitelbaum.

5. Upon information and belief, the Respondents: Miriam Teitelbaum and Jacob Teitelbaum, the parents of the children are the persons who are responsible for the neglect of the children.

6a. On April 27, 2010, the following children, [REDACTED] Teitelbaum and [REDACTED] Teitelbaum, were temporarily removed from the care of the above-named Respondents on the basis of the foregoing facts and in accordance with:

on an emergency basis without a court order pursuant to Family Court Act §1024. There was no time to obtain a court order because: the children were at imminent risk.

7a. Continuation in, or return to, the children's home would be contrary to the best interests of the child because:

This assertion is based upon the following information:

Report of Suspected Child Abuse or Neglect

b. Reasonable efforts, where appropriate, to prevent or eliminate the need for removal of the child from the home:

were made as follows: The family was involved with Community based services within the Kiryas Joel community. The family was also receiving preventive services through Berkshire Farms. A preventive services caseworker, family development specialist and a housekeeping specialist were assigned to assist the family.

The family and the community established a safety plan whereby the children would be cared for by the Respondents' relatives and neighbor and the Respondent father no longer wants them to care for the children. On or about April 27, 2010, the Respondent father demanded the return of the children and refused to develop another safety plan for the children.

This assertion is based upon the following information:

Report of Suspected Child Abuse or Neglect

c. Based upon Petitioner's investigation:

The following person: Chaya Katz is a  relative with whom the child may appropriately reside.

Such person:

may be a resource but not yet determined whether as a foster parent or custodian.

The following person: David Rubenstein is a  suitable person with whom the children may appropriately reside.

Such person:

may be a resource but not yet determined whether as a foster parent or custodian.

d. Imminent risk to the children  would not be eliminated by the issuance of a temporary order of protection or order of protection directing the removal of the Respondents from the children's residence.

8. The subject child is not a Native-American child who is subject to the Indian Child Welfare Act of 1978 (25 U.S.C. §§ 1901-1963).

9. Petitioner is required to obtain education information and to provide that information to foster care providers and other parties to this proceeding. Unless otherwise obtained by release, Petitioner thus seeks a court order to obtain the education records (including special education and early intervention records) of each child named in this Petition who is not placed with a parent(s)/legal guardian(s), and a court order to provide such records to service providers where such records are necessary to enable the service provider to establish and implement a plan of service.

WHEREFORE, Petitioner requests that an order be issued determining the children to be neglected and otherwise dealing with the children in accordance with the provisions of Article 10 of the Family Court Act.

Dated: April 28, 2010

DAVID L. DARWIN, ORANGE COUNTY ATTORNEY

By: 

STEPHANIE BAZILE  
ASSISTANT COUNTY ATTORNEY  
ORANGE COUNTY DEPARTMENT OF LAW  
FAMILY LAW DIVISION  
ORANGE COUNTY COURTHOUSE  
285 MAIN STREET  
GOSHEN, NEW YORK 10924  
(845) 291-2650

In the Matter of

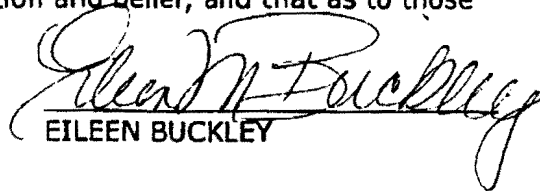
[REDACTED] TEITELBAUM  
[REDACTED] EL TEITELBAUM

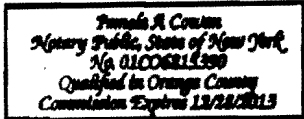
VERIFICATION

STATE OF NEW YORK )  
  ) ss.:  
COUNTY OF ORANGE )


EILEEN BUCKLEY being duly sworn, deposes and says:

I am employed by the Orange County Department of Social Services as a Supervisor and am acquainted with the facts and circumstances of the above-entitled proceeding; I have read the foregoing petition and knows the contents thereof; that the same is true to my own knowledge except as to those matters therein stated to be alleged upon information and belief, and that as to those matters I believe it to be true.

  
EILEEN BUCKLEY



Sworn to before me this  
28<sup>TH</sup> day of APRIL, 2010

  
Notary Public