

EXHIBIT M

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF ORANGE

-----X
In the Matter of

 TEITELBAUM
 TEITELBAUM

CIN# EK12272M
CIN# EC47314V

Docket No.
B-00347-12
B-00348-12
File No. 55083

Children under Eighteen Years
of Age Alleged to be Neglected

**AFFIDAVIT IN
OPPOSITION
TO SHOW CAUSE**

JACOB TEITELBAUM
MIRIAM TEITELBAUM Respondents

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JACOB TEITELBAUM, being duly affirmed, hereby deposes and states under penalties of perjury:

1. I am a respondent in the subject proceedings brought by the Dept. of Social service for a termination of my parental rights.
2. I make this affidavit in opposition to the show cause brought by the department of social services of Orange County for an order to conduct a psychiatric evaluation.
3. During the winter of 2010, my wife's family became upset us, they kidnapped our children, thereafter child protective services got involved and returned our children to us, they investigated our family for several months thereafter and found no wrongdoing.
4. ~~In March 2010 my friend Mr. Ben Friedman and myself got involved in~~ a campaign against an illegal kidnapping of Mr. Blum from Kiryas Joel (who was held captive and forced to give a religious *Get* (divorce) to his wife Mrs. Blum of London U.K., a forced *Get* is invalid by religious law).
5. This campaign enraged certain individuals within the community, and as part of their efforts to intimidate and stop myself from this campaign, they enlisted the KJ Hatzalah EMT ambulance corps of Kiryas Joel together with

the Child protective services of Orange County to further their agenda, they took information that had no relation with myself, they then fabricated and misused this information to form charges against myself, as a result the CPS removed our children on April 27th 2010, said removal was to intimidate me to stop this campaign.

6. Said removal was based on two fabricated alleged occurrences of neglect, one being that "I did not properly close the children's Tylenol medication, and my child [REDACTED] then ingested some of the medication", the second charge was; "that I left my children at home alone and my neighbors found them alone and crying".

7. Those charges were entirely false, baseless and fabricated, on or about April 26th 2010, my wife called the Hatzalah ambulance EMS of KJ when she noticed that our child [REDACTED] held an open bottle of baby Tylenol medication not knowing whether the child had ingested some of it or not, Mr. David Rubenstein a Member of the Hatzalah EMS responded to the call, he told my wife he wants to take the child to check him out in the hospital, he then asked her to sign a consent that he be permitted to keep our other child [REDACTED] in his house until the next day when she would be back home with [REDACTED] from the hospital.

8. My wife after having signed for him unsuspecting anything was forced by said Mr. David Rubenstein into the NY Presbyterian mental hospital through trickery, claiming that he is taking the child into the hospital while taking her instead, the child [REDACTED] was subsequently taken to Dr. Werzberger the child's doctor for a check up.

9. While she was already in the Mental institution she was not allowed to call me to inform of what happened to her and the child, when she was finally able to call she inquired as to the whereabouts of the child, I informed her that I have no clue as I had not been informed of anything, the police was then informed, however the Hatzalah still did not want to disclose his whereabouts.

10. The next day the CPS contacted me and asked if I already have a plan where to place our child [REDACTED] I said that I do not know as of yet, they then charged me in their report that I do not want to cooperate with the safety plan of those in the community who want to help the child (those who are trying to stop me from the campaign), therefore I am an irresponsible father, they then claimed that we cannot be given the children, and they proceeded to seek out allegations against myself.

11. The cps charged me on April 28th that I gave the child [REDACTED] Tylenol, then failed to close the bottle and our child [REDACTED] ingested the Tylenol, the cps further charged that when I was asked how this happened? I responded that the child "somehow got it", while they do not state who asked me or when this discussion took place, and neither did they state a specific date, only alleging that on April 2010 such a story happened, the only time that anything with Tylenol happened, was the story where David Rubenstein of the Hatzalah forced my wife into mental institution on April 26th.

12. I was not home during that entire episode, I did not give any of my children Tylenol during that incident, and neither was there any other similar incident, only my wife was at home and she called the Hatzalah, the CPS social worker Ms. Eileen Buckley fraudulently fabricated the story to reflect that I was at home and that I gave the child Tylenol while allowing the other child to get hold of it, in order to justify their removal to serve this political agenda of the community, while being fully aware that this is a complete fraud.

13. The second fabricated incident that the CPS charged me supposedly happened on April 14th 2010, "~~my neighbors went to my home upon hearing~~ the sound of crying children, they were found to be alone in the home, the neighbors then took the children to their home as neither me or my wife could be found, and that I only started looking for the children two hours later.

14. What really transpired was, that in the evening of April 14th 2010, I was at home and some individuals from within the community acting to intimidate

and stop me from the campaign, who were delivering and exchanging something for my wife, then entered the home and without any notice abducted our child [REDACTED] who was sleeping at the time, the child [REDACTED] remained with me.

15. There were no neighbors, and no sound of crying children, I was at home during that time, they were not found to be alone in the home as they were with me, the neighbors did not take the children to their home, rather those individuals grabbed the child in the middle of his sleep and abducted him.
16. Although it was obvious and known to me from the outset that the CPS charges were a conspiracy to stop me from the campaign, nonetheless being that I did not understand the English language, not knowing any family law, and being unable to afford a private attorney, I figured that the less I would show that it's bothering me, the sooner they will become tired in this conspiracy game, my former attorney Mr. John F.K. Burke insisted on not going to trial claiming that he would get an ACD which never happened either while my wife did get an ACD, I never knowingly consented to those fabricated charges since I never committed them, I was unable to present a proper defense at the time, with my limited abilities I was helpless at that time, not realizing and not understanding what was going on between my former attorney, the Court, and the DSS.
17. Around the same time of the removal on April 27th 2010, my wife Miriam who at the time was fully supporting me, also became a target by those ~~in the community fighting me politically, it was reasoned that once she will reverse position against myself, it will imply great pressure to gain control over myself to stop me from the campaign.~~
18. Since the Hatzalah forcefully institutionalized my wife on April 26th in order to justify and allow the community and the CPS to remove my children to further their agenda, by establishing the pretense that my wife is mentally

ill, she then became very stressed from all this, she was then given high amounts of psychotropic meds, once she was more asleep then alert, they were able to dialog with her into cooperating against myself, they convinced her that it is her duty to stop me from this campaign.

19. On September 7th 2010 during the Jewish high holidays CPS returned the children to our home.

20. On September 15th we were demonstrating in a protest in Kiryas Joel as part of said campaign.

21. On September 16th a day after the demonstration, our younger child [REDACTED] could not be woken from his day sleep as he would usually, the child was consequently taken to the hospital by Hatzalah EMS of KJ, and the hospital treated the child for symptoms resembling medication overdose.

22. The CPS subsequently brought charges against myself, of which I am still waiting to receive a copy of those charges, claiming that I neglected the child to become overdosed by ingesting the same medication as I was prescribed to take, although I was not at home during the entire time this episode occurred, and it was known that I was never taking prescribed medication whatsoever.

23. My wife though, was home during the entire time with the child on that day, she was taking prescribed medication regularly, and she was the one who dealt with any prescribed meds that reached our home whether for myself, herself or the children, however she was cleared of these charges, since she ~~was cooperating with those in the community against me at the time.~~

24. In Oct. 2010, it was planned and agreed with the CPS to celebrate the religious ritual customary in the community on the date the child bears three years of age to be held at my home on Oct. 11th, two days prior to that date the CPS changed their mind and said they were not sure they would facilitate for the ritual to be held at my home as earlier agreed, the day prior to Oct. 11th the

CPS advised me that the ritual would take place at the home of one of those individuals leading the efforts to stop me from the campaign, the CPS did not give any reasoning for the sudden change.

25. Thereafter the court ordered visitation at our home giving my wife three and ½ hours a week, split between Wednesday's and Friday's, where for myself the court ordered only one and ½ hour for Wednesday thereby ordering me to leave my own home each Friday in a time when my children were visiting my home.

26. Subsequently, child Protection offered a possible return of the children providing that we would undergo parenting lessons, However following a year long that we indeed followed through with such recommendation, the CPS still refused to return the children, insisting that I have yet to admit that I have a problem and therefore require help without mentioning any specifics, while also stating that my wife did admit and comply to accept help during said period.

27. Throughout the year my wife had cooperated with those individuals in the community fighting my campaign, by pressuring me to sever ties to anyone that was active in said campaign, by not permitting me to be contacted by phone, she would answer the phones and not allow me to receive or return such calls.

28. Although my wife was in peace and harmony with me, she cooperated with them against me to satisfy them as she was made to believe that it was her duty to stop me from the campaign, she was willing to follow whatever the community and the CPS had requested of her even if that meant to be in a fight with me.

29. In January of 2011 a child was born to the illegal married couple resulting from the invalid *Get* divorce and illegal forceful kidnapping that I campaigned against, according to Jewish law this is known as an illegal child a '*Mamzer/es*' (bastard), causing the situation to become more tense, as now

there is a permanent symbol to the infamous act of those in the community.

30. On July 18th 2011, those individuals in the community out of desperation that all their efforts have failed so far and the campaign still continues, convinced my wife to cooperate with Hatzolah EMS service of K.J. to have me forcefully kidnapped (from the synagogue where I regularly attended) and involuntarily admit me to mental institution (Bellevue hospital) where I would undergo forced medication in order to gain control over myself, said David Rubenstein from the K.J. Hatzolah was leading the abduction on myself, (David Rubenstein became the foster parent to one of the children for some time prior to that).

31. On the following day my friend was able to sign me out from the hospital and I returned to K.J., once back in K.J. on the same day I found myself being chased again in the street by K.J. Hatzolah members which was again led by David Rubenstein, upon realizing that a subsequent abduction is imminent I took cover by fleeing in a friend's car to my friend Mr. Ben Friedman's house.

32. The Hatzolah members continued to chase me to my friend's house, intimidated both of us, attempted to open the door, and intruded through the window threatening my friend that they would kidnap both of us if he won't open the door for them.

33. My friend immediately enlisted the help of the nearby N.Y. State Police, who rescued the situation, the Hatzolah members then left the scene, I followed up by going to Arden Hill Hospital so they would evaluate me to ascertain there was no cause for alarm and to prove that the allegations were false, Arden Hill hospital evaluated me and saw no reason that I should be admitted to any mental institution.

34. Both hospitals would only release me based on the condition that I was not to return to my home, although there was no reason for such, they were nonetheless instructing me not to return home due to my wife and others in the

community advising them to instruct me to do so, my wife later admitted, that she was acting under the influence of those in the community fighting me, this was supposed to be an act of intimidation to stop me from the campaign.

35. Thereafter I went home, however my wife still under instructions to institutionalize me, called the Hatzalah requesting they should remove me from the house to mental institution, however the Hatzallah did not respond to her request, since the State Police had stopped them, my wife in a further attempt to remove me from the home, called the State Police and requested to remove me from the home, the State Police then advised her that they cannot do so, as I am no threat to anyone, there is no history of violence either, they further advised her that her only choice would be to ask the family court to remove me from the home.

36. After those individuals in the community realized that all efforts have failed to gain control over myself, they started inciting my wife against me, thereby causing a further rift between us, consequently following the above incident with the kidnappings in late July 2011, my wife acting under instructions seized my clothing, (white *bekitshe* - special garment for the Shabbas, and my Shabbas prayer shawl), and gave it to those individuals in the community.

37. Following this episode, said individuals in the community who realized that their efforts were still not producing any results, and I am still continuing in the campaign, instructed my wife to move out of the home into another apartment on her own, hoping to gain control over myself by intimidation, ~~however this was way too much for her, she refused to take that step and~~ ultimately remained in the house with me.

38. During the following few weeks in Aug. 2011, I had demanded and insisted upon my wife to return my clothing, I maintained a firm stance that I will not take such further intimidation, this placed a great amount of stress on her - coupled with the strained relations already, the situation reached the max,

my wife consequently unable to take this pressure anymore discontinued the fight against me, realizing that she cannot fulfill their agenda, she then demanded from those individuals in the community to have the clothing returned to us, she resumed to live in peace and harmony with me.

39. Once those individuals in the community realized that their grip on my wife using her to gain control over myself was lost, since she stopped damaging the familial relationship, they started fighting her, as if she was the target instead of myself, she was now seen as an enemy by cooperating with me rather than with them, consequently she was threatened by them that she too will be kidnapped and involuntarily placed in mental institution for not cooperating with them, and stopping her efforts on their behalf to control me.

40. On Sep. 8th, 2011 while my wife went outside to locate me, being afraid to be alone in the home due to said threats of abduction, she was abducted by K.J. Hatzalah, this information was intentionally kept from myself so I would not be able to act, the admitting hospital (N.Y. Presbyterian, in Westchester county) was directed by those individuals in the community not to consider anything from myself or my friend Mr. Ben Friedman whatsoever, my wife was then kept institutionalized for about two and a half weeks till late Sep. 2011.

41. While in the hospital, my wife called her mother Mrs. Tennenbaum to inquire as to why she participated in said abduction, her father Rabbi Meir Tennenbaum interrupted the conversation with a hysteric voice and told her "you deserved it, because six weeks ago you told me that your husband is the problem, and now you are in peace with him and Mr. Friedman, I'm not afraid of your husband or Mr. Friedman".

42. On Oct 6th 2011, my wife's parents - Rabbi Meir and Mrs. Tennenbaum after having a heated discussion with her about being in peace with me, sent the Hatzalah to our home to abduct my wife again to a mental institution, she called the police, nevertheless she was taken to Orange county

Horton medical center, who after hearing from myself that she is fine and that it was a false alarm, released her that day.

(Of interest to note that had the police not intervened, she would have been abducted to the Westchester or Manhattan institution and kept there for a while, as Hatzalah groups are known to regularly abduct people who become targets in the community to those hospitals in Westchester or Manhattan they are affiliated with).

43. Fire caught wind rapidly, the CPS who were up till now maintaining that I am at fault and my wife is all good and cooperative, now responded in kind and suddenly changed direction, it was like they almost forgot that I was the target.

44. Evidently on Oct. 21st 2011, during the high holiday of '*Simchas Torah*' when all men pray and dance in the synagogue with the children, following an earlier request and disagreement between my wife and the CPS, to have the children visit shortly with me in the synagogue to participate in the rituals like all other children in the presence of a monitor, my wife who then allowed the children to visit the men section of the synagogue to dance with me for a mere few minutes, had her visitation of the children at our home discontinued by the DSS.

45. On Nov. 4th, 2011, during my wife's scheduled visitation with the children at the Dept. of Social Service in Goshen NY, DSS after advising her that the scheduled and agreed upon allotted visitation time was shortened to much less than previously agreed upon, my wife who had then simply inquired as to why it was shortened and requested that she be granted the full time previously agreed upon, the CPS then removed her involuntarily to the Horton Medical Center by saying that she was irritated.

46. Her health had deteriorated as a result of her now being targeted as she had resumed to live in peace with me being unable to continue the fight against me, albeit her best intentions to fulfill their wishes to continue their fight, the

DSS were now able to use this as a pretense to further justify their actions.

47. As part of their efforts to stop my campaign, our children were placed in foster with a family in the community who are openly stating that their goal is to intimidate and stop me from the campaign, this family is deeply embroiled and taking an active part in the politics of those in the community.

48. The current foster home is a breeding nest for hatred and hostility against ourselves, for instance our oldest child started to refer to my wife by calling her "Mrs. Teitelbaum" instead of the usual "Mommy" he was used to call her, while simultaneously now referring to his foster mother "Mommy" instead, they also continue to teach our children that their family name is not "Teitelbaum" but is rather the same name as that of their foster parents, and many other examples.

49. During the later half of Oct. 2011 we found a local neutral family in K.J. the 'Halperts', who were willing and able to foster our children at their home for as long as needed, while being supportive and accommodating to our needs and the needs of the children, thereby allowing to ease the situation as much as possible. However as soon as those individuals in the community got wind of that, they went to the Halpert's and challenged them against considering to become foster parents, while the Halpert's were still able to foster our children, the Halpert's were then unable and unwilling to be up for a fight with these individuals.

50. The village of Kiryas Joel is comprised of three strong groups divided between the "Aharoinim" headed by Rabbi Aharon Teitelbaum, the "Zaloinim" headed by Rabbi Zalman Teitelbaum, and the "Bnai Yoel", since I started in the campaign with Mr. Ben Friedman we are not associated with any of the above three groups and could not receive any protection in KJ.

51. We have informed the CPS about the severity of this grave situation several times, nonetheless they have chosen to continue with this hostile foster home, had they cared for our children they would have placed the children in a

neutral foster home where there would be no hostility and the foster parents would allow us to visit regularly with our children, the CPS would then have been able to observe our loving and caring relationship to our children, however since they do not care for the children's interests in the least, they allow the children to be bred in hostility and hatred against us further damaging our family and to be used as a means to intimidate ourselves in order to stop my campaign.

52. The CPS who until late summer were targeting only myself and were in good terms with my wife as long as she complied with those politically fighting me, changed direction soon after she had stopped fighting with me about the campaign, as soon as she stopped cooperating with them to further their political agenda, she became a target for the CPS and those individuals in the community, in contrast to their stance up until that time.

53. Since it now became very obvious that the DSS is not concerned for the interests of the children, and that those involved in the conspiracy aren't getting tired with their efforts to stop me from the campaign by continuing to terrorize me, I figured that it would be a good opportunity to alert the Court through a motion about the conspiracy that's going on, where I would not need to know any family law to file that, and I could also receive support for that from my friends who are helping me in the campaign, and I would not have to pay any money to achieve this, I filed this motion on Dec 27th 2011, describing in detail that the proceedings and actions of the DSS are politically based and motivated and are acting as an extended arm of the community, as detailed in the exhibit A of that motion.

54. The political actions of the DSS soon became even more evident when they changed direction again as soon as I filed said motion in Court, the CPS had previously filed a motion which was returnable on the Jan 4th 2012, with fresh claims against my wife, while also having stopped her visitation at our home for a while, however as soon as I filed my motion, the DSS dropped their motion on Jan 4th 2012 with all claims against her, and instead renewed their

efforts against myself again, while this was done completely off the record, there is not even any record for the appearances on that day when we were all in court for a scheduled appearance, there is no record or transcript available for that day whatsoever.

55. Following the above, my wife's attorney Ms, Maria Petrizio Esq. (of orange county legal aid) informed her on five separate occasions that the DSS and the Court informed her, that they are upset and angry about my motion, that they are not willing to grant her custody as long as she is living with me, therefore she must comply with them to request from the court to evict me from our home, she added that failing to file such a request would cause her to lose the children forever.

56. On January 3rd My Wife's attorney said to her, that she was present in court when the judge received my motion, and the Judge was very angry and upset on me for filing this motion, therefore he will not allow our children to be returned home while I'm remaining in the home.

57. Said attorney further stated that I will not get custody because I am aligned with Mr. Ben Friedman and because I supposedly did not cooperate with my (former) attorney Mr. John F.K. Burke who was assigned by the court, she further stated that if the subject of my motion is raised in court the next day on the 4th when we are due in court, then I should inform the Court that I did not file this motion.

58. The attorney then stated that if my wife wants to continue to be represented by her, my wife would have to comply by asking the Court to get her children back and to evict me from our home, and she would have to decide with whom she will side, whether with myself or with her attorney, as she (the attorney) cannot continue to represent her (my wife) anymore if she chooses to remain with me, because the judge is very upset on me, the attorney demanded that my wife give her a definitive answer by the next day the 4th when we were due in Court.

59. On Jan 4th while we were in Court standing next to each other, my wife's attorney remarked to my wife that she should ignore and abandon me, that I need to be abandoned because of having filed that motion.

60. The attorney then demanded of my wife which of the two she had chosen, whether to request a return of the children and evict me from our home, to which she (the attorney) will then continue to represent her, or whether she chooses to remain with me, thereby losing her children forever and also lose her representation.

61. On Jan 9th the law guardian Ms Kim Pavlovic Esq. proposed in Court to return the children to my wife and to evict me from our home, my wife's attorney as well as Mr. John F.K. Burke together demanded of myself after the Court session to leave our home immediately, my wife's attorney then said to her that if she will not comply to ask the Court to evict me from our home, she will lose her children forever.

62. On Jan 10th I wrote to the court about said incident, and on Jan 17th I filed another motion requesting written clarification from the DSS as to what they require me to do in order to correct their fabricated charges, and in response to these the following call came in to my wife.

63. On Jan 20th my wife's attorney called her again and proposed that she file a motion to evict me from our home for several months, to allow her to get the children back, the attorney stated that if my wife will not file this motion she will lose her children forever, she was pressuring my wife strongly to file this motion.

64. The same day I sent a letter to the Court asking why this is happening and if my motion is causing a problem resulting in such responses, I received no response to this letter until Jan 26th as follows.

65. In further responding to my motions and letters, the DSS on Jan 25th filed their petition for termination of parental rights with fabricated mental

claims that they never before used, and the adjoining motion, now pending before the Court.

66. On Jan 26th even though the DSS had already filed their new claims to terminate our parental rights, my wife's attorney called her again, inquiring about her decision to comply in moving the court for custody and evicting me from our home, my wife stated very strongly that she cannot remain without me, especially if the children are returned to her when she will need my assistance, and that getting the children back without myself being present at home could be detrimental to the children's wellbeing, her attorney nonetheless ignored all that and insisted on her complying by filing such motion and continued to strongly pressure her to comply.

67. The attorney then further stated that the judge had decided already not to return the children to her while I remain at home, and she remains with one option to get the children back, to file a request to evict me from our home allowing her to get the children back, the attorney added that since the judge has formed his decision already not to return the children to me, he will not change his mind ever again, and if my wife won't proceed as above she will lose the children forever.

68. Since the DSS had already filed their parental termination application before the above call was made, this is just further proof that this was done just to apply more pressure to my wife to cooperate in filing a motion to evict me from our home, apparently once my wife would comply with such request to file the motion to evict me from our home, it would somehow magically cause ~~her mental illness to totally vanish, thereby causing the pending application for parental rights against her to disappear.~~

69. Until I filed the first motion the DSS always maintained that I am not harmful to our children, as evident from the unsupervised visitation we were having at our home for some period prior to my motions, thereby being no reason why I cannot remain in the home while my wife gets custody.

70. Ever since April 27th 2010, thru Dec 27th 2011, during which time I did everything that was requested of me for the interests of our children, I also participated in counseling whenever I was asked to, although I knew that the CPS sole motive is act as the extended arm of the community to further their agenda to stop me from the campaign.
71. During this period my attorney did not defend me whatsoever, he did not communicate with me to explain the proceedings, nor to get my side of the story or to advise me properly, I did not receive papers relating to the proceedings, my English language abilities is very limited, the Court knew that I do not speak English properly and neither did I possess any knowledge of the law, they also knew that some in the community are targeting me to stop me from the campaign, therefore they were able to act in court without me having knowledge of what they were doing.
72. From the time the CPS dropped the new claims against my wife on Jan 4th, they are constantly attempting to get my wife back to help them fight against me to further the agenda of those in the community to stop the campaign, to achieve this, my wife, the Hatzalah, the DSS, my children, and the Court were all enlisted.
73. In response to alerting the court on Dec 27th and in response to my repeated requests for information, and in response to stating that I am willing to cooperate and do everything to correct their fabricated charges for the interests of the children, if they will provide me with the specifics of what I have to comply with in relation to these fabricated charges, I got only terror and intimidation and an petition for termination of parental rights, it is clear that they are not interested to care for the children but rather to act as the extended arm of the community.
74. This is a nice try of the DSS to escape from their duty and obligation to plan for the return of the children and reuniting the family, and just further proves what they already admitted by not responding to my motion timely,

furthermore by not taking advantage of the opportunity to clarify their position in these proceedings, evidently points to the fact that the DSS is indeed politically motivated and acting as the extended arm of the community to stop me from the campaign against the invalid forced "Gittin" divorces.

75. It is expected from this Hon. Court not to allow the DSS to play such games in this court, to deny their motion and dismiss their entire petition to terminate parental rights.

WHEREFORE, respondent respectfully requested that the Hon. Court (a) deny the motion of the DSS to conduct a mental/psychiatric evaluation in its entirety, (b) deny the petition of the DSS to terminate parental rights in its entirety, (c) and to direct the DSS to provide a plan in writing to reunite the children with their parents, (d) and the Court grant such other and further relief as it deems just and proper.

Dated: Monroe, New York

February 7, 2012



JACOB TEITELBAUM
Respondent

Affirmed to before me on
7 day of February, 2012.

Notary Public
SHLOIME TORIM
Notary Public, State of New York
No. 01100016397
Qualified in Orange County
Commission Expires Feb. 8, 2014

