

THE LAW OFFICE OF JARED S. ZAFRAN, LLC

By: Jared S. Zafran, Esquire

Attorney ID No: 208269

Andrew J. Thomson

Attorney ID No. 87844

1500 Walnut Street, Suite 500

Philadelphia, PA 19102

Phone: 215-587-0038

Attorney for Plaintiff



MAJOR CASE

SADDIE DEBISETTE GOMEZ

5126 Ludlow Street

Philadelphia, Pennsylvania 19139

Plaintiff,

v.

SOUTHEASTERN PENNSYLVANIA

TRANSPORTATION AUTHORITY

1234 Market Street

Philadelphia, Pennsylvania 19107

Defendants

PHILADELPHIA COUNTY

COURT OF COMMON PLEAS

MAY TERM, 2022

NO.: 220502550

PLAINTIFF'S COMPLAINT
20 – PERSONAL INJURY - OTHER

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.

Philadelphia Bar Association
Lawyer Referral and Information Service
1101 Market Street
Philadelphia, PA 19107
(215) 238-6333

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 comparecencia 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.

Illeve 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 dirección se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociación De Licenciados De Philadelphia County
Servicio de Referencia E Información Legal
1101 Market Street
Philadelphia, PA 19107
(215) 238-6333

Case ID: 220502550

COMPLAINT

Plaintiff, Saddle Debisette Gomez, by and through her attorney, Jared S. Zafran, alleges as follows.

PARTIES

1. Plaintiff Saddle Debisette Gomez, is an adult citizen resident of the Commonwealth of Pennsylvania, who can be contacted through her counsel, Jared S. Zafran, 1500 Walnut Street 5th floor, Philadelphia, Pennsylvania 19102.
2. Defendant, Southeastern Pennsylvania Transportation Authority (hereinafter referred to as "SEPTA") is a quasi-public governmental entity doing business in the Commonwealth of Pennsylvania with registered and/or principal offices, as captioned above.
3. At all times material hereto, Defendant SEPTA has provided transit services to the Greater Southeastern Pennsylvania area, including service in Delaware and New Jersey.
4. At all times material hereto, Defendant SEPTA has owned, operated, maintained, was responsible for, and / or otherwise controlled Frankford Transportation Center at 5223 Frankford Avenue, Philadelphia, Pennsylvania 19124, and all adjoining stations connected by the Market-Frankford Line.
5. At all times material hereto, Defendant SEPTA has owned, operated, maintained, was responsible for, and / or otherwise controlled a fleet of transportation vehicles, including Buses, Trolleys, and Commuter Rail Vehicles.

MATERIAL FACTS

6. At all times material hereto, defendant SEPTA was responsible for the maintenance and upkeep of their stations, terminals, and vehicles.
7. At all times material hereto, defendant SEPTA was responsible for maintaining the safety and security of those environments and vehicles and to ensure that commuters were reasonably safe from harm.
8. At all times material hereto, defendant SEPTA maintained a police force in order to assist with their responsibilities and commitments to ensuring a safe environment for all SEPTA commuters.
9. At all times material hereto, the SEPTA police force was understaffed, resulting in a smaller police presence at SEPTA stations and on SEPTA vehicles.
10. At all times material hereto, SEPTA operators are unable to handle those

evading fare collection due to founded fears for their personal safety.
11. At all times material hereto, the amount of security and level of safety in SEPTA stations and on SEPTA vehicles was deficient with regards to ensuring that commuters were reasonably safe from harm.
12. At all times material hereto, SEPTA police administration and general ridership administration intentionally altered SEPTA guidelines to permit unsanitary and unlawful conduct to run rampant such that a state of lawlessness existed on SEPTA transit lines in the city of Philadelphia.

13. SEPTA's decision to allow this lawlessness on its city transit division stood in stark contrast to the level of staffing on the Regional Rail system, every train on which features multiple SEPTA staff and employees.
14. SEPTA's enforcement decision to encourage a culture of lawlessness and filth on the Broad Street and MFL while devoting employee resources to the Regional Rail system belies the profitability of the MFL and Broad Street Lines, the fares from which support SEPTA's operations.
15. In the face of these economic conditions, SEPTA still chose to understaff its police force and not enforce basic rider codes of conduct in its city division, subjecting the riders who support its system to sub-standard conditions that created a state of lawlessness that led to a rapid increase in assaults and robberies on its trains, a few of which are described in the below paragraphs.
-
16. On March 21st, 2021, SEPTA was forced to close Somerset Station, on the Market-Frankford Line ("MFL"), indefinitely due to filthy and dangerous conditions resulting in the deterioration of public safety and the dysfunction of vital infrastructure within the station.
17. The filthy and subhuman conditions at the station were a direct result of SEPTA leadership's decision to refuse to enforce public safety and health code laws meant to protect riders of the MFL.
18. On April 23rd, 2021 through April 25th, 2021, SEPTA was forced to prematurely close Allegheny Station, on the Market-Frankford Line, in order to subject the station to a deep-cleaning necessitated by the station's state of disrepair and dysfunction.

19. The filthy and subhuman conditions at the station were a direct result of SEPTA leadership's decision to refuse to enforce public safety and health code laws meant to protect riders of the SEPTA MFL.
20. Over the past year, newspapers and news organizations throughout the Philadelphia region have published a litany of reports and documentation reflecting the sub-standard safety conditions of SEPTA stations and vehicles.
21. On July 15th, 2021, a man was shot onboard a SEPTA bus, as reported by FOX29 Philadelphia.
22. On August 4th, 2021, a Driver was assaulted by a passenger while operating a SEPTA Bus, as reported by 6ABC Philadelphia.
23. On September 29, 2021, a pregnant woman was assaulted and robbed at knifepoint at SEPTA's Lombard-South station, as reported by 6ABC Philadelphia.

24. On October 13th, 2021, a woman was raped aboard a train on SEPTA's Market Frankford Line, as reported by FOX29 Philadelphia.
25. On October 19th, 2021, a 16 year-old girl was robbed at knife-point at SEPTA's Race-Vine Station at 3:24 in the afternoon, as reported by NBC10 Philadelphia.
26. On October 20th, 2021, a woman was sexually assaulted at SEPTA's 69th Street Transportation Center, as reported by CBS Philadelphia.
27. On November 16th, 2021, several students were assaulted by multiple assailants while aboard a train on SEPTA's Broad Street Line.

28. On November 30th, 2021, a woman was punched twice in the face by several assailants while aboard a train on SEPTA's Market Frankford Line, as reported by FOX29 Philadelphia.
29. In February 2022, as reported by CBS Philadelphia, a SEPTA Bus Driver was assaulted and spit on by a SEPTA passenger. As a result of the altercation, SEPTA began to direct operators to ignore individuals refusing to pay the required fares for admittance.
30. Over the weekend of February 5th, 2022, there was a pair of assaults at two stops on SEPTA's Market Frankford Line and a trio of gunpoint robberies at three stops on SEPTA's Market Frankford Line, as reported by WHYY.
31. On March 13th, 2022, a pregnant woman was assaulted onboard a Night Owl Bus on SEPTA's Market Frankford Line, as reported by FOX29 Philadelphia.
-
32. On April 4th, 2022, at 5 pm, a 17-year old girl was assaulted and robbed by a group of three assailants while at Girard Station on SEPTA's Broad Street Line, as reported by FOX29 Philadelphia.
33. On April 6th, 2022, a Driver was assaulted by a passenger while operating a SEPTA Bus, as reported by 6ABC Philadelphia.
34. On April 21st, 2022, a man was shoved onto the tracks at the 30th Street and Market Street stop on SEPTA's Market Frankford Line, as reported by FOX29 Philadelphia.

35. On April 24th, 2022, at 4:30 pm, a commuter was stabbed while waiting at the 34th Street and Market Street stop on SEPTA's Market Frankford Line, as reported by FOX29 Philadelphia.
36. On April 24th, 2022, a passenger was sexually assaulted onboard a train on SEPTA's Broad Street Line, as reported by FOX29 Philadelphia.
37. On May 5th, 2022, a passenger was threatened with a knife while onboard a train on SEPTA's Broad Street Line, as reported by the Philadelphia Inquirer.
38. On May 16th, 2022, at 8:45 AM, a woman was indecently assaulted while at Race-Vine Station, on SEPTA's Broad Street Line, as reported by 6ABC Philadelphia.
39. On May 19th, 2022, at 11:30 AM, a SEPTA officer was assaulted at the 52nd Street and Market Street stop on SEPTA's Market Frankford Line, as reported by 6ABC Philadelphia.
-
40. On May 23rd, 2022, a maintenance worker was stabbed while working at 30th Street Station, as reported by 6ABC Philadelphia.
41. The above examples are just some of the crimes perpetrated on SEPTA riders and employees since SEPTA's police and general management chose to restrict officers what few officers were available to patrol
42. SEPTA Police are understaffed, and their resources are misallocated as a direct result of SEPTA's policies.
43. SEPTA's stations and vehicles suffer from a dearth of security personnel to ensure safe conditions on those stations and vehicles.

44. SEPTA police and MFL staff do not enforce ridership restrictions and as a matter of policy allow riders to continue on the MFL in multiple directions without exiting the train after it is clear that they have no destination.
45. SEPTA's policy choice to refuse to enforce basic health and safety codes, public drunkenness and drug abuse laws, and its own rules regarding ridership and evasion of fares has resulted in a condition of lawlessness.
46. Over the past year, there have been numerous sexual assaults and rapes in SEPTA stations and on SEPTA vehicles.
47. Over the past year, there have been numerous assaults, armed robberies, and beatings in SEPTA stations and on SEPTA vehicles.
48. Over the past year, there have been numerous stabbings and shootings in SEPTA stations and on SEPTA vehicles.
-
49. Over the past year, SEPTA has acknowledged the dangerous conditions that exist in SEPTA stations and on SEPTA vehicles.
50. Upon information and belief SEPTA now-retired Chief of Police Thomas Nestel implemented a hands-off approach and SEPTA administration actively and purposely instructed SEPTA police officers to ignore criminal behavior on the MFL since approximately 2019 through the present.
51. Upon information and belief, rank and file officers objected to these policies, but were instructed to ignore what administration considered "minor" offenses such as fare evasion, public drug use, public intoxication, public urination, cigarette smoking, and other offenses that subsequently became predominant on the MFL.

52. SEPTA leadership, including Chief of Police Thomas Nestel, continued this plan of policing even in light of rising crime and safety concerns of SEPTA employees who were also the subject of violence. They continued to instruct officers not to enforce basic rider codes of conduct, including restrictions against public urination, sleeping on trains and at stations, intravenous drug use on trains, public intoxication and drug abuse, threatening behavior, smoking, and fare evasion.
53. SEPTA's leadership knowingly chose staffing and policing policies that turned its Market Frankford and Broad Street lines into a social-welfare experiment in sheltering the homeless and creating safe injection sites for drug abuse rather than as a means of public transportation for all of Philadelphia's citizens.
54. The ridership that remains on SEPTA face a heightened level of danger due to emptier stations and vehicles and as a direct result of SEPTA's policies.
-
55. The above and below averments are a direct result of SEPTA's knowing unwillingness to properly staff their police force and properly allocate resources to ensure a safe environment on their vehicles and in their stations, and such unwillingness shocks the conscience.
56. Less than two weeks before the assault on Plaintiff, SEPTA's own police force acknowledged that it was woefully understaffed. In a Philadelphia Inquirer article, when asked about the increase in crime on the MFL and other SEPTA service lines, Omari Bervine, president of the Transit Police FOP Lodge, stated "We have a police staffing crisis."

57. On March 23, 2022, 29-year SEPTA employee told Fox29 News that “it’s just horrible that the company I worked for, for 29 years, do not [sic] about my safety.” This statement from a SEPTA employee underscored the state of the mass transit system.
58. On May 6, 2022, just two days after the assault on Plaintiff, SEPTA was again forced to close the Somerset MFL stop elevators due to public urination. Later that week, SEPTA attempted to combat the “quality of life issues” on the MFL and Broad Street Line by deploying dozens of private security officers to patrol.
59. That the above and below averments are direct result of SEPTA’s reluctance to properly institute a safe environment on their vehicles and at their stations is a conclusion which any reasonable person should come to in light of the above listed facts.
60. SEPTA knew or should have known that their reluctance to properly staff their police force and appropriately allocate their resources would result in the crime, unsanitary conditions, and unsafe environment that currently plagues passengers and employees of SEPTA alike.
61. SEPTA knew or should have known that allowing rampant drug abuse, filth, public urination and defecation, and other criminal acts at all hours of operation would create a sense of lawlessness on the MFL that resulted in the assault on the evening of May 4th, 2022, which constitutes the basis for this Complaint.
62. That aggravated assaults and robberies on SEPTA property have risen more than 80% between 2019 and 2021 is a direct result of SEPTA’s policies. Statistics from

2022 are not yet available, but the trend has continued as evidenced in Plaintiff's assault and the other incidents highlighted above.

63. On or about the evening of May 4th, 2022, Plaintiff Saddle Debisette Gomez was a passenger on a Market-Frankford line train headed to the Frankford Transportation Center. She had gone to the mall in Northeast Philadelphia to purchase a present for her daughter after a long day of work, and was simply returning home approximately 10pm.

64. When Plaintiff arrived at the Bridge-Pratt terminal and paid her fare, she noticed numerous people loitering at the station and on the platform in disheveled condition and seemingly under the influence of drugs or other intoxicants.

65. On or about the evening of May 4th, 2022, Nora McDougal was also on the Market-Frankford line train that waited at the Bridge-Pratt station prior to beginning its journey westbound.

66. Upon information and belief, Nora Rodriguez had been riding the same Market-Frankford line train apparently in both directions aimlessly without having to exit the train after the completion of the one-way direction covered by the fare paid to SEPTA, a practice that the new lax policies of enforcement implemented by Chief of Police Nestel and SEPTA administration permitted.

67. SEPTA was aware that permitting law-breaking and potentially unstable commuters to remain in SEPTA stations or on SEPTA vehicles could contribute to a dangerous situation, but continued to allow these individuals to remain on the Market-Frankford line at all times of day.

68. At or around 10 pm on or around May 4th, 2022, Nora McDougal robbed and assaulted Plaintiff Saddle Debisette Gomez.
69. After Plaintiff eventually was able to get help from SEPTA police several stops away from the attack, SEPTA police arrested Nora McDougal. The Philadelphia District Attorney charged Nora McDougougal with F2 Robbery and other charges under docket MC-51-CR-0007292-2022. She was given \$25,000 bail.
70. Nora McDougal was on an active bench warrant for drug possession with intent to deliver charges under docket MC-51-CR-0018907-2020 at the time of her arrest for the assault on Plaintiff on May 4, 2022.
71. Nora McDougal, despite having been on bench-warrant status and having been accused of commission of an F2 robbery of Plaintiff, was given sign-on bond and release from jail.
-
72. Nora McDougal was given a court date for the drug charges of May 24, 2022. She was given a court date on the robbery charges of May 20, 2022.
73. Of course as predicted by her prior history of skipping court appearances, Nora McDougal failed to appear for her May 20, 2022 preliminary hearing on the robbery charges.
74. Plaintiff attended the court date to testify against McDougal on May 20, 2022.
75. The Court continued the case until June 3, 2022.
76. Even with McDougal's failure to appear history and two active cases, the Court permitted McDougal's counsel from the Defender Association to sign a subpoena for

her attendance at the June 3, 2022 hearing. The District Attorney representing the Commonwealth acquiesced to this request and did not object.

77. McDougal failed to appear at the May 24, 2022 hearing on drug charges, and the Court issued a bench warrant.

78. Plaintiff attended the scheduled June 3, 2022 hearing as a witness.

79. McDougal, as expected by her past history and her bench warrant the previous week on two-year-old drug charges, did not appear.

80. McDougal is now wanted on two bench warrants, while Plaintiff attended two court hearings to testify against her assailant.

81. Plaintiff sought treatment for her injuries at a hospital and was diagnosed with injuries to her ribs, head and neck and back.

82. Plaintiff has and may have in the future suffer economic loss, loss of income, loss of future earning capacity as a result of the injuries she sustained in the attack that was a result of the conditions of the MFL on May 4, 2022.

83. Plaintiff has become a victim of a system currently at play in the city of Philadelphia that ignores the rights of law-abiding citizens, who become victims of the policies implemented to allow law-breakers to take over the public commons with impunity and without consequence. Even when Plaintiff's assailant was arrested by police, McDougal was freed on reduced bail and simply chose not to attend scheduled proceedings against her.

84. As a direct and proximate result of the intentional, reckless, and wanton conduct of all defendants, jointly and severally, as more fully set forth in the Counts below, Plaintiff- Saddle Debisette Gomez suffered harm including:

- a. Physical assault, with its attendant physical and mental signs, symptoms, and sequellae;
- b. Anxiety;
- c. Fractured ribs;
- d. Injuries to lumbar and cervical spine;
- e. Fear and fright;
- f. Mental anguish;
- c. Post-Traumatic Stress Disorder, with its attendant physical and mental signs, symptoms, and sequellae;
- f. Past and future physical pain and suffering;
- g. Past and future mental pain and suffering;
- h. Past and future loss of life's pleasures;
- i. Past and future humiliation;
- j. Past and future embarrassment and disfigurement;
- k. Past and future lost earnings and lost earning capacity;
- l. Past and future medical expenses;
- m. Past and future noneconomic loss; and,
- n. Such other ills and injuries set forth in the medical records and which will be set forth, and more fully described, as this lawsuit continues.

COUNT I – CIVIL RIGHTS 42 U.S.C § 1983

Plaintiff, Saddle Debisette Gomez v. SEPTA

85. The preceding paragraphs and allegations stated above are incorporated by

reference as though fully set forth herein.

86. Defendant SEPTA is a state entity that is subject to suit pursuant to 42 U.S.C § 1983.

87. Defendant SEPTA's constitutional torts are not governed or limited in any way by 42 Pa.C.S. § 8541, *et seq.* or 42 Pa.C.S. §8251, *et seq.*

88. Defendant SEPTA violated Saddle Debisette Gomez's substantive due process right to bodily integrity, to life and to liberty, all of which are secured by the Fourteenth Amendment to the Constitution of the United States.

89. At all times material hereto, defendant SEPTA acted under color of state law.

90. At all times material hereto, defendant SEPTA acted under color of state law by and through their agents, ostensible agents, and / or employees.

91. The specific harm to which defendant SEPTA exposed Saddle Debisette Gomez was foreseeable and direct in that they were aware that allowing an unstable passenger to remain unfettered in a SEPTA station or on a SEPTA vehicle would result in harm to SEPTA passengers, including but not limited to assault.

92. Defendant SEPTA's reluctance to rectify the dangerous and unsanitary conditions they alone created in their stations and on their vehicles created a degree of culpability that shocks the conscience.

93. Defendant SEPTA's allowance of assailant Nora McDougal to remain on a SEPTA vehicle despite the dangerous situation their presence created a degree of culpability that shocks the conscience.

94. Defendant SEPTA acted in willful disregard to the safety of Saddle Debisette Gomez when they followed the policy implemented to allow lawbreakers on the MFL

at all times and permitted Nora McDougal to remain on the Market-Frankford line despite their unstable condition and obviously aimless commute.

95. Defendant SEPTA's self-described commitment to creating a safe riding experience and environment for all commuters formed a relationship such that Saddle Debisette Gomez was a foreseeable victim of defendant SEPTA's acts.

96. As a commuter on a SEPTA vehicle, Saddle Debisette Gomez was a member of a discrete class of persons subjected to the potential harm brought about by defendant SEPTA.

97. Defendant SEPTA's deliberate acts of permitting rampant lawlessness drug abuse, withholding police protection, and overall refusal to enforce its own code of safety and conduct constituted a "state-created danger", rendering SEPTA liable to Saddle Debisette Gomez for violation of her civil rights.

98. Despite their awareness of the risk of assault, aggravated assault, sexual assault, armed robbery, and otherwise molestation of SEPTA commuters by unstable and transient individuals in SEPTA stations and on SEPTA vehicles, SEPTA either deliberately chose not to adequately portion their police force to monitor their stations and vehicles or acquiesced in a longstanding practice or custom of inaction in this regard.

99. Despite their awareness of the risk of assault, aggravated assault, sexual assault, armed robbery, and otherwise molestation of SEPTA commuters by unstable and transient individuals in SEPTA stations and on SEPTA vehicles, SEPTA either deliberately chose not to allocate resources to ameliorate this dangerous situation in SEPTA stations and on SEPTA vehicles, or acquiesced in a longstanding practice or

custom of inaction in this regard

100. The constitutional rights violated by defendant SEPTA consisted of liberty, privacy, and bodily integrity.

101. Defendant SEPTA acted intentionally or with deliberate indifference to the rights of Saddle Debisette Gomez.

102. As a direct result of the actions of defendant as set forth above, Saddle Debisette was caused to suffer injuries as set forth in paragraph 67.

Wherefore, Plaintiff, Saddle Debisette Gomez, demands judgment against defendant Southeastern Transportation Authority, and compensatory damages, jointly and severally, together with attorney fees and costs, and pre and post judgment interest, in a sum in excess of \$50,000, plus interest and other relief which the Court may deem appropriate.

COUNT TWO - CIVIL RIGHTS 42 U.S.C § 1983 -CUSTOM OR POLICY, FAILURE TO INVESTIGATE, TRAIN, SUPERVISE and/or DISCIPLINE

Plaintiff, Saddle Debisette Gomez v. SEPTA

103. The preceding paragraphs and allegations stated above are incorporated by reference as though fully set forth herein.

104. Prior to May 4th, 2022, SEPTA, including its police department, developed and maintained policies or customs exhibiting deliberate indifference to the constitutional rights of citizens, which violated their constitutional rights to life, liberty, and bodily integrity.

105. Specifically, SEPTA administration chose policies that permitted gross violations of the ridership code of conduct, laws governing public indecency and

intoxication, and basic human decency which resulted in a danger to all riders forced to subject themselves to a state of lawlessness on every train.

106. By choosing to understaff the MFL, SEPTA exacerbated this problem as the lawless riders preyed on riders like Plaintiff, often without repercussion and without surveillance.

107. SEPTA failed to investigate the results of its open lawlessness policy and implement changes to secure the civil rights of its law-abiding riders.

108. SEPTA failed to supervise and train its employees to enforce basic laws on its trains all while acting under the color of law.

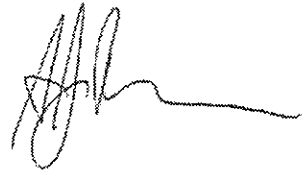
109. As a result of the failures and intentional acts and omissions, SEPTA violated the constitutional rights of Plaintiff and hundreds of other riders who fell victim to crime on the MFL and other city division lines.

110. As a result of conduct by SEPTA employees and administration, acting under color of state law, Plaintiff was deprived of her rights, privileges and immunities guaranteed to her by the United States Constitution and the Constitution of the Commonwealth of Pennsylvania. All of these acts violated 42 U.S.C. §1983, 1981, 1985, 1986 and 1988.

Wherefore, Plaintiff, Saddle Debisette Gomez, demands judgment against defendant Southeastern Transportation Authority, and compensatory damages, jointly and severally, together with attorney fees and costs, and pre and post judgment interest, in a sum in excess of \$50,000, plus interest and other relief which the Court may deem appropriate.

Respectfully submitted,

LAW OFFICE OF JARED S. ZAFRAN, LLC

A handwritten signature in black ink, appearing to read 'J. Zafran', with a long horizontal flourish extending to the right.

Jared S. Zafran, Esquire
A.J. Thomson, Esquire

Date: July 6, 2022

VERIFICATION

Plaintiff SADDIE DEBISETTE GOMEZ verifies that the statements made in this pleading are true and correct to the best of plaintiff's knowledge, information and belief. To the extent that the pleading contains averments of law and language of counsel and results of investigation, plaintiff has relied on counsel. Plaintiff understands that false statements herein are made subject to penalties of 18 Pa. §4904, relating to unsworn falsification to authorities.



ID fxWGkdVWPvDkeyFYnpVSKjtCa

SADDIE DEBISETTE GOMEZ

eSignature Details

Signer ID:	fxWGKdWPvDkeyFYNpV5KjtCa
Signed by:	Saddie Debisette Gomez
Sent to email:	sdg9503@gmail.com
IP Address:	73.13.113.66
Signed at:	Jul 7 2022, 4:24 am EDT