

## AFFIDAVIT OF BARRY F. FEUDALE.

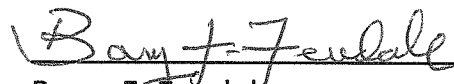
I, Barry F. Feudale, am over the age of 18 and a resident of the Commonwealth of Pennsylvania. I have personal knowledge of the facts stated herein. I suffer no legal disabilities and declare that, to the best of my knowledge and belief, the information herein is true, correct and complete.

1. I was appointed by Chief Justice Ronald Castille of the Pennsylvania Supreme Court to serve as the Supervising Judge of the 30th and 33rd Statewide Investigating Grand Juries. Both of these Grand Juries conducted investigations into Gerald Sandusky's alleged criminal conduct.
2. I had previously served as the Supervising Judge for numerous other Statewide Investigating Grand Juries.
3. Former Supreme Court Justice Cynthia Baldwin was involved in cooperating with investigations into Gerald Sandusky and the Pennsylvania State University, but as of late July 2012 had not yet testified before the Grand Jury. Justice Baldwin had served as General Counsel for the Pennsylvania State University through much of the above referenced investigations.
4. In late July of 2012, I attended the Pennsylvania Conference of State Trial Judges held in Hershey, Pennsylvania.
5. While at the Conference of State Trial Judges I was approached by a Supreme Court employee, who I believe was/is named Tom Darr, on or about July 26, 27, or 28, 2012, who informed me that Justice Thomas Saylor wished to speak with me. I told him that I was meeting someone at the moment and was unavailable at that time.
6. Later at the conference, the same individual approached me while I was at the hotel's outdoor pool. He again informed me that Justice Saylor wanted to speak with me and was surprisingly insistent in telling me that it had to be immediate and in private. The whole matter was increasingly odd. I followed Mr. Darr to a more private area near the pool.
7. Justice Saylor and I were left alone and we exchanged normal greetings. I was surprised at the odd nature of the meeting. Justice Saylor made statements that "Feudale, you are doing a good job with the Grand Jury". I thanked him and asked if there was something specific that he wanted to discuss. He stated that he was aware of the Grand Jury's work on the Penn State matter and that a "lawyer's disciplinary complaint" was forthcoming against Cynthia Baldwin as a result of her actions in that investigation. I

had no information about such a complaint but he was clear that it would be investigated. He specifically stated that he expected me to assist in every way with providing information in support of the disciplinary investigation. I was stunned. I responded that he must be aware of the ambit of grand jury secrecy and the prohibition of any disclosures for such an investigation.

8. Justice Saylor responded that this assistance and discipline was necessary because "she caused us a lot of trouble when she was on the Supreme Court with her minority agenda." He also reiterated that he felt I was "doing a good job as the supervising judge". The conversation then ended.
9. At least 2 people were made aware, very shortly thereafter, of this conversation with Saylor at the conference.
10. I prepared notes of the conversation between myself and Justice Saylor shortly after its occurrence. Those notes are no longer in my possession as I was not permitted by agents of the court/ Office of the Attorney General to retain all my materials after concluding my service with the Grand Jury.
11. Although I have been troubled by these matters since they occurred, I am now revealing the specifics of this conversation as having seen the Decisions of the Disciplinary Board against both Cynthia Baldwin and Frank Fina by which their professional standings and personal reputations are being called into serious questions, I believe that it is essential that the relevant parties in the full disciplinary processes be aware of these troubling circumstances,

I declare under penalty of perjury or false statements that the above statements are true and correct. Executed this 26th day of August, 2019.

  
Barry F. Feudale

Commonwealth of Pennsylvania

County of CHESTER

Sworn and subscribed to before me this 26<sup>th</sup> day of August, 2019.

NOTARY PUBLIC

Name: James Hardy

My Commission Expires: 5-8-2020

NOTARIAL SEAL  
JANICE HARDY, NOTARY PUBLIC  
Tredyffrin Twp., Chester County  
My Commission Expires May 8, 2020