

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

<p>ROXANNE GRINAGE</p> <p>Plaintiff Pro Se</p> <p>FERN BROWN CAPLAN, ET AL</p> <p>Defendants</p>	<p>CIVIL ACTION No. 2:09-cv-04119-MSG</p> <p>AMENDED COMPLAINT</p> <p>PER MSG 9/15/09 ORDER “PLAINTIFF MAY RESUBMIT HER REQUESTS IN COMPLIANCE WITH FED. R. CIV. P. 65”</p> <p>1. PLAINTIFF RESUBMITS EMERGENCY REQUEST FOR RESTRAINING ORDER TO PROTECT PLAINTIFF FROM DEFENDANT, TIMOTHY E. POSSENTI'S RELENTLESS FASHIONING OF FORGED FAMILY COURT DOCUMENTS WHICH ABUSE DEPLOYMENT OF CITY LAW ENFORCEMENT, DEFRAUD FAMILY COURT CLERKS AND CUSTODY MASTER'S UNIT AND OBSTRUCT AN OPEN DEPARTMENT OF HUMAN SERVICES CHILD WELFARE INVESTIGATION PLAINTIFF IS GRATEFULLY COMPLYING WITH.</p> <p>2. PLAINTIFF ADDS PROOFS OF “CONSPIRACY TO COMMIT KIDNAPPING FOR PROFIT RACKETEERING SCHEME” WHICH APPLY TO DEFENDANT TIMOTHY E. POSSENTI ONLY TO 13 COUNTS OF OFFICIAL CORRUPTION CHARGES MADE IN 9/10/09 COMPLAINT INCORPORATED BY REFERENCE.</p> <p>Fraudulent documents are scanned and embedded into this Amended Complaint.</p>
--	---

AMENDED COMPLAINT

COMES NOW, Plaintiff, in her own right and sets forth only these statements for which she also provides evidence of:

1. Plaintiff invokes right given to her by Event 4 in docket **2:09-cv-04119-MSG**

and resubmits her request for Emergency Protection from one defendant in particular, Timothy E. Possenti, Esq., PC. who practices in this Court as a commercial litigation attorney, but who also serves as part-time support master and defense counsel in CCP Philadelphia Family Court.

2. The 13 counts of stalking, terrorist threats, official corruption, willful reckless child endangerment, obstruction of health care and obstruction of education; and fraud charges made in Plaintiffs 09/10/09, and accompanying proof Exhibits are incorporated by reference as if fully set forth.

3. Racketeering Kidnap for Profit defendant Timothy E. Possenti is extorting his own client, defrauding family court and law enforcement and obstructing an open DHS child welfare investigation which Plaintiff Roxanne Grinage is grateful to comply with. See scanned embedded documents herein.

4. Defendant Timothy E. Possenti, Esquire is fashioning fraudulent family court documents that cause deployment of law enforcement and Custody Master's unit against Plaintiff Roxanne Grinage. See scanned embedded documents herein.

5. Defendant Timothy E. Possenti, Esquire is aware the IMMD Tactical Response Unit headed by ethical DHS Social Worker and professional Philadelphia Police Sergeant has determined that children may not be taken to Timothy E. Possenti's addiction impaired client and that Plaintiff Roxanne Grinage is complying with sixty (60) days DHS home visits investigation which will result in another family court custody hearing date, for the purpose of DHS making recommendations as to whether Plaintiff Roxanne Grinage's home is suitable for the children to stay in or whether placement in a foster home is the only option. See scanned embedded documents herein

6. Racketeering Kidnap for Profit defendant, Timothy E. Possenti, Esquire knows his client cannot have the kids because he is addiction impaired and refusing to go to drug and alcohol treatment. See scanned embedded documents herein

7. Racketeering Kidnap for profit defendant is fashioning documents and sliding them past Family Court clerks and Custody Master's unit in a desperate attempt to kidnap the children into a foster home where Timothy E. Possenti, Esquire becomes eligible to receive payment from one or more of the Philadelphia Government's Contractor Service Providers of Foster Care and Adoption Agencies. See scanned embedded documents herein.

8. Racketeering Kidnap for Profit defendant Timothy E. Possenti is extorting his own client, defrauding family court and law enforcement and obstructing and open DHS child welfare investigation. See scanned embedded documents herein.

9. The crimes committed by the defendants were done within the context of a CCP Family Court custody matter and the 8-17-09 order of the defendants which Plaintiff published and offered 32 pages of proofs which documented daily civil rights violations; professional misconducts of the defendants including conspiracy, criminal intent, destroying and falsifying evidence, perjury, extortion, deliberate refusal to participate in discovery and disclosure, etc. See scanned embedded documents herein.

10. 09/24/09, two US Marshals visited Plaintiff at our home and took pictures of Roxanne Grinage with both grandchildren and this Court has proofs that on 09/24/09, Roxanne's grandchildren were in the home with Roxanne Grinage being protected from the kidnap for profit racketeering scheme of defendant, Timothy E. Possenti, Esq.

11. 10/08/09, An emergency tactical response unit which included a DHS social worker and several Philadelphia police officers headed by a Police Sergeant, came to Plaintiff's home having received a report that Supervisor Judge Margaret T. Murphy presided over a hearing during which it was determined Plaintiff protective grandmother, has "history of mental problems." See scanned embedded documents herein

12. 10/08/09, ethical, professional DHS social worker and a Philadelphia Police Sergeant saw no reason to remove the children and asked Roxanne Grinage if she had any proofs that she does not have a history of mental problems. See scanned embedded documents herein

13. 10/08/09, IMMD tactical response unit Police Sergeant read the severity of types and levels of drugs in Timothy E. Possenti's submitted positive drug results of Roxanne's son-in-law, and Timothy E. Possenti's letter to defendant Fern Brown Caplan attaching an email from a Delaware county practicing custody evaluator, that Timothy E. Possenti's client need only pay an additional \$225.00 the next month and a negative drug test would be produced; See scanned embedded documents herein.

14. 10/08/09, ethical IMMD social worker and Philadelphia Police Sergeant learned that Timothy E. Possenti and Fern Brown Caplan intended to recklessly endanger the children by sending them unlawfully to reside with a stranger girlfriend who is receiving SSI for hearing disability and who has multiple auto accidents wherein she is cash settlement plaintiff three times, until next court date scheduled by Fern Brown Caplan six months away; destroying Plaintiff 47 pages 7/20/09 scheduled to be heard Nov 23, 2009 and which had five years of proofs that Plaintiff's son-in-law has threatened his family with a shot gun; has frequently drug and alcohol relapses and proofs of drug dealers threatening kidnapping torture and death of

Timothy E. Possenti's addition impaired client because of money owed by Erick to drug dealers. Exhibit H of Plaintiff's destroyed custody complaint is in fact a District Attorney's public nuisance report with proofs of Timothy E. Possenti's client illegal auto repairs made on the street.

15. 10/08/09, IMMD DHS responding social worker and Police Sergeant made several calls and determined that there was never any hearing presided over by Margaret T. Murphy about the mental health of Roxanne Grinage and that supervisors no DHS legal Department knew where the alleged "order" came from. It was dropped on the desk of the IMMD tactical response unit by someone who had access to the family court's forms. See scanned embedded documents herein.

16. 10/14/09 Plaintiff Roxanne Grinage gratefully complied with DHS home visit investigation which began when DHS social worker Kenneth A. Dixon arrived approximately 4:32 PM. See scanned embedded documents herein.

17. 10/14/09 DHS home visit social worker took photographs of the children, interviewed Plaintiff Roxanne Grinage and victim protective mother Lorraine Grinage. See scanned embedded documents herein.

18. Racketeering Kidnap for Profit defendant, Timothy E. Possenti served upon Plaintiff Roxanne Grinage in complete contempt of these US District Court proceedings a September 30th family court unsigned, fraudulent Certification of Service dated September 20th and alleging service by Federal Express, with a September family court clerk stamped filed "order" that is not completed with any information or any signature or stamp signature of a judge. See scanned embedded documents herein.

19. 10/15/09 defendant Timothy E. Possenti, has not answered this Court's summons to answer Plaintiff Complaint, but sends process server accompanied by 8th District Police Officer Murphy to hand serve Custody Master's Rule To Show Cause which is issued on the 15th demanding appearance on the 16th, today, in conflict with Defendant Timothy E. Possenti's forged 9/20/09 via Federal Experience Certificate of Service for the Family Court Clerk's 9/30/09 filed stamped Petition for which Custody Master Michael Horan is issuing August 15th order for Roxanne Grinage and Lorraine Grinage to appear very next day, today to Show Cause why Timothy E. Possenti's September 30th petition to enforce 8-17-2009 order.

20. Defendant Timothy E. Possenti knows his and Fern Brown Caplan's 8-17-09 custody order is made moot by open Department of Services home investigation of child welfare custody matters concerning Roxanne Grinage will be revisited according to the rescheduling of hearings and recommendations of responsible Department of Human Services employees named below. See scanned embedded documents herein.

21. Fraudulent documents are scanned and embedded into this Amended Complaint.

22. Defendant Timothy E. Possenti, continues to slander Plaintiff to the detriment of her professional reputation, she cannot get employment in the Philadelphia legal community. See scanned embedded documents herein

23. Defendant Timothy E. Possenti continues to slander Plaintiff with irresponsible and unfounded statements like, "history of mental problems", "internet smear campaign", and "rambling." See scanned embedded documents herein

24. Plaintiff Roxanne Grinage's internet company uses internet technologies to document rights of ownership to creative work products and Roxanne Grinage won recognition

by Wharton Business School nomination to Philadelphia 100 in 2001; and qualified for expert certifications in 7 areas of administrative practice by the Pennsylvania's Bureau of Contract Administration, as a Minority Woman Business Enterprise, which include Evidence Gathering, Depositions and Expert Witness Testimony.

25. Roxanne Grinage was managing submission of community development data to a Presidential Whitehouse fifteen member managed service list of Executive Staff and Officers, before official corruption defendants in this federal matter did victimize Roxanne Grinage and her family in CCP Family Court, and Roxanne Grinage has responsibly recorded, respectfully reported, the nonfiction crime story of Fern Brown Caplan and Timothy E. Possenti's hijacking of an otherwise ethically administrated custody case for their very own financial gain.

WHEREFORE, Plaintiff prays this Honorable Court will

Order Defendant Timothy E. Possenti to Stay Away from Plaintiff Roxanne Grinage and family members for whom Roxanne Grinage is natural guardian, Lorraine Grinage, Ezekiel and Arriyel Brown. Restrain Defendant Timothy E. Possenti from influencing or deploying Family Court staff or law enforcement with his relentless fraudulent forged family court documents;

Order Racketeering Kidnap for Profit Defendant Timothy E. Possenti to Stay Away from any matters concerning the child custody or child welfare of Roxanne Grinage's family.

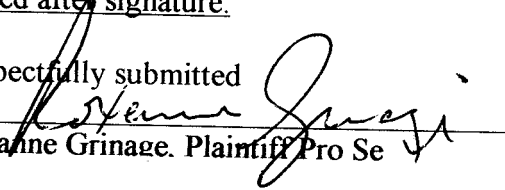
Order Defendant Timothy E. Possenti to stop criminal obstruction of an ethical Department of Human Services child welfare investigation that Plaintiff Roxanne Grinage and victim mother Lorraine Grinage are gratefully complying with.

Order Defendant Possenti to stop slandering Roxanne Grinage with false unproven allegations of "history of mental problems", "internet smear campaign" and "rambling."

Order all Defendants to Answer Plaintiff Roxanne Grinage's 09/10/09 Complaint or if this Court deems appropriate, hold non-answering Defendants in contempt of this Court.

Scanned evidence documents are embedded after signature.

Respectfully submitted



Roxanne Grinage, Plaintiff Pro Se

Date: October 16, 2009