

**SPRAGUE & SPRAGUE**

Richard A. Sprague, Esquire, (I.D. # 04266)  
Joseph R. Podraza, Jr., Esquire (I.D. # 53612)  
William H. Trask, Esquire (I.D. # 318229)  
The Wellington Building, Suite 400  
135 South 19<sup>th</sup> Street  
Philadelphia, PA 19103  
(215) 561-7681

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28 JAN 2019 10:03 am  
M. BRYANT*

*Attorneys for Plaintiff*

HONORABLE DAYLIN LEACH  
601 South Henderson Road – Suite 208  
King of Prussia, PA 19406

Plaintiff,

v.

CARA TAYLOR

[REDACTED]  
Bath, PA 18014

and

GWEN SNYDER

[REDACTED]  
Philadelphia, PA 19104

and

COLLEEN KENNEDY

[REDACTED]  
Havertown, PA 19083

Defendants.

IN THE COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

CIVIL ACTION

Term:

No.

**NOTICE TO DEFEND**

**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

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia 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 tomara medidas y puede continuar la demanda en contra suya sin

notice for any money claimed in the complaint of 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  
One Reading Center  
Philadelphia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197**

previo aviso o notificacion. Ademas, 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.

*Lleve 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 telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.*

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HONORABLE DAYLIN LEACH,  
601 South Henderson Road – Suite 208  
King of Prussia, PA 19406,

V.

*Defendants.*

.....

No.

Case ID: 190102559

embellishing upon the serial liar's fabrication about plaintiff for the admitted purposes of destroying plaintiff's reputation, cutting short his career in public service, and harassing and harming his family. The three defendants have sought to achieve their goals by seeking to exploit for their own malicious purposes an important political movement in order to broaden the audience of their false claim among a trusting, unknowing, and unsuspecting public, to wrongfully mobilize and incite unwitting accomplices against plaintiff, and to inflict maximum harm on plaintiff and his family based on accusations they know to be false. The defendants have openly admitted the sole purpose of their endeavor is to see plaintiff's "head" mounted as "a trophy on their wall" regardless of truth and common decency. This action is brought to champion the truth and redress the defendants' malicious falsehood.

## **II. PARTIES**

1. Plaintiff, the Honorable Daylin Leach ("Leach") is an adult individual and citizen of the Commonwealth of Pennsylvania who maintains a business address at 601 South Henderson Road, Suite 208, King of Prussia Pennsylvania 19406. Leach has served in the Pennsylvania Senate representing Pennsylvania's 17<sup>th</sup> senatorial district since 2009, and previously was a member of the Pennsylvania House of Representatives representing the 149<sup>th</sup> district from 2003 to 2009. Prior to 2003, Leach practiced law for 16 years and was an adjunct professor at two colleges in Pennsylvania. He is married and the father of two children.

2. Defendant Cara Taylor, f/k/a/ Cara Kuhns ("Taylor") is an adult individual and citizen of the Commonwealth of Pennsylvania residing, upon information and belief, at [REDACTED] Bath, Pennsylvania 18014.



3. Defendant Colleen Kennedy (“Kennedy”) is an adult individual and citizen of the Commonwealth of Pennsylvania residing, upon information and belief, at [REDACTED] Havertown, Pennsylvania 19083, who is a self-proclaimed political and public policy expert.

4. Defendant Gwen Snyder (“Snyder”) is an adult individual and citizen of the Commonwealth of Pennsylvania residing, upon information and belief, at [REDACTED] [REDACTED], Philadelphia, Pennsylvania 19104, is a self-described grassroots movement strategist, and previously accused an elderly man of sexual assault who later was acquitted of her accusation following trial in a court of law.

### **III. JURISDICTION AND VENUE**

5. The Court has jurisdiction over all parties pursuant to 42 Pa.C.S. § 5301.

6. Venue is proper in the Court of Common Pleas of Philadelphia County pursuant to Pennsylvania Rule of Civil Procedure 1006(c)(1).

### **IV. FACTS**

#### **A. Taylor is an Admitted Perjurer Who has Fabricated Lies About Leach**

7. Defendant Taylor is an admitted and judicially determined perjurer and serial liar, who has willingly conceded that she will lie without compunction to promote her personal interest and agenda.

8. In sworn testimony in a court of law provided in 1992, Taylor has admitted that, even as a young teenager, she was willing to repeatedly lie to obtain employment under false pretenses, and would move from employer to employer to avoid detection. (N.T., Jun. 9, 1992 at p. 11:15-21, attached hereto at Exhibit “A.”)

9. As an adult, Taylor lied ***under oath*** at her mother's 1992 trial for the attempted murder of Taylor's step-father. At the trial, Taylor falsely swore that she, not her mother, was responsible for the attempted murder of Taylor's step-father. (*Id.* at p. 5:18-23.)

10. As a result, Taylor was charged by the Lehigh County District Attorney with perjury and false swearing after the 1992 trial and later pleaded guilty to charges of felony perjury and false swearing for which she was incarcerated. (*See* N.T., Apr. 15, 1999 at p. 7:17-24, attached hereto at Exhibit "B.")

11. Indeed, during the original 1992 attempted-murder trial, Taylor made clear her willingness to lie for her own benefit and for that of her mother, which admissions may have contributed to the jury's disregard for her false testimony and unanimous guilty verdict. (*See, e.g.,* N.T. Jun. 10, 1992 at pp. 92:25 – 93:7, Exhibit A.)

12. Leach, criminal defense counsel in Taylor's mother's 1992 criminal trial, was an early victim of Taylor's stated willingness to lie in order to achieve her ends by any means.

13. In neither her mother's sentencing for attempted homicide, nor in her own sentencing for perjury did Taylor allege any unethical or inappropriate conduct on the part of Leach, despite the fact that allegations of such misconduct, if believed, would have potentially helped both her and her mother avoid or shorten incarceration.

14. At her sentencing for perjury, Taylor testified under oath that lying and perpetrating a fraud on the court in her mother's criminal trial was her idea alone.

15. After Taylor's mother was sentenced for attempted homicide, Leach no longer had any involvement in her case, and had no further contact with either Taylor or her mother outside of testifying at Taylor's mother's 1999 post-conviction proceedings.

16. Taylor's mother unsuccessfully pursued the full gamut of direct appeal options for seven years.

17. Seven years after her trial, in 1999, during post-conviction proceedings to challenge the conviction for the attempted murder of Taylor's step-father, and in an effort to secure her release from prison, Taylor's mother filed a Post Conviction Relief Act ("PCRA") Petition which fabricated a story of an improper, one-time years-earlier sexual encounter between Taylor and Leach as a ground for overturning her mother's 1992 conviction.

18. Despite the allegations in the Petition, when afforded the opportunity in 1999 to testify under oath in a court of law, Taylor declined, and her mother agreed to voluntarily withdraw Taylor's false and salacious allegation against Leach rather than see Taylor face the prospect of a second perjury conviction with an accompanying longer prison sentence. (N.T., Apr. 15, 1999 at pp. 6:12 – 8:20, Exhibit B.)

19. Taylor and her mother withdrew the false and defamatory allegation, despite the court making it clear that they would be forever waiving the opportunity to gain any benefit that the false allegation might afford them.

20. Taylor's mother even opined on the record at the April 15, 1999 court proceeding that she was voluntarily withdrawing the false allegation of improper conduct against Leach by Taylor because her daughter, Taylor, was a convicted perjurer whose fabrications could not be believed. (*Id.* at p. 8:6-8.)

21. Despite the fact that the false and salacious allegation was withdrawn by Taylor and her mother, Leach voluntarily testified at the hearing that he had no physical relationship with Taylor at any time. He so testified under oath, something Taylor refused to do at that same hearing. (*Id.* at p. 53:11-20.)

22. Moreover, Taylor's false testimony and subsequent guilty pleas on the charge of perjury and false swearing were widely reported in the contemporaneous media.

23. For example, the November issue of *The Morning Call* reported that Taylor would "spend 30 days in jail for lying when she testified in her mother's Lehigh County trial," and although "[n]ot everyone who fibs in court is charged with perjury, [Taylor's] lie was one of 'monstrous proportions.'" (Debbie Garliki, *Woman gets jail term for lying at mom's trial*, THE MORNING CALL, Nov. 13, 1993, p. 91, attached hereto as Exhibit "C.")

**B. The Defendants Weaponize and Embellish Taylor's Knowingly False Accusation**

24. Kennedy volunteered a number of times on Leach's Congressional campaign of 2014.

25. At the conclusion of the 2014 campaign, Leach and Kennedy parted on good terms, with Kennedy posting friendly and positive messages on Leach's social media accounts. To Leach's knowledge, he and Kennedy have never been in the same room together or communicated in person again.

26. Leach has, to his knowledge, never personally met, or spoken to, Snyder.

27. Leach's first became aware of the existence of Snyder when she began attacking him on social media as "predatory," an "abuser," an "assaulter" and a "rapist."

28. During the course of the preceding year, Kennedy and Snyder, upon information and belief, have become increasingly close associates of Taylor. In fact, it is believed and therefore averred that the three defendants are in constant contact through social media and regularly meet in-person.

29. Kennedy and Snyder operate on the fringes of state and local politics and in collaboration with Taylor, have recently taken to exploiting the energetic fervor of legitimate



political activists to amplify their concerted attacks on Leach to advance their own private ambitions and vindictive agendas.

30. Now Kennedy and Snyder, using the inconsistent and demonstrably false accusation of a known and convicted perjurer (Taylor), have dogged Leach continually with outrageous accusations of sexual misconduct.

31. At all times Kennedy and Snyder knew that Taylor was personally not credible and that her claim of sexual misconduct by Leach was not credible. Nevertheless, Kennedy and Snyder spread Taylor's false allegation against Leach despite Taylor's known long history of lying and deceit, thereby acting in blatant and reckless disregard of the truth.

32. And all three Defendants knew and have known that Taylor's allegation of rape against Leach is false before and at the time they nevertheless decided to recklessly broadcast Taylor's false claim against Leach through the Internet and elsewhere.

33. At all times relevant hereto, Snyder and Kennedy knew of Taylor's felony conviction in 1993 and of the withdrawal of her heinous and false allegation of improper conduct by Leach under the threat of new perjury charges if this allegation was actually pursued before the Court at the 1999 hearing.

34. Nevertheless, despite having knowledge of the falsity of Taylor's sexual-misconduct claim against Leach, Snyder and Kennedy agreed to conspire with Taylor to extend the public reach of Taylor's false claims for the sole purpose of injuring Leach's professional and personal reputations and to shamefully subject him and his family to public ridicule and scorn under false pretenses.

35. By way of illustration, Taylor, who upon information and belief enjoyed the support and encouragement of Snyder and Kennedy, maliciously published on her publicly

accessible Facebook page her fabricated account of prior contact with Leach, stating repeatedly beginning in February 2018 that Leach “drove [Taylor] to his apartment and sexually assaulted [Taylor].” (Exhibit “D” at p. 6 of 7.)

36. Thereafter, and throughout 2018, Taylor repeatedly published and republished her false attacks on Leach as evidenced by a sampling thereof, a compilation of which is attached hereto as Exhibit “E.”

37. During this time, upon information and belief, Snyder and Kennedy encouraged Taylor’s increasing dissemination of her knowingly false allegation against Leach while assisting Taylor in expanding the reach of Taylor’s false attacks by separately republishing them online, by appearing at public events to harass Leach about Taylor’s false claim, and by encouraging others in person and over social media to take action against Leach based on Taylor’s knowingly false allegation against Leach.

38. Not only did Snyder and Kennedy republish Taylor’s false accusation against Leach, they also incredibly embellished this false claim to better serve their own malicious objectives.

39. For instance, Snyder took to every corner of the Internet proclaiming as a “confirmed” fact that Leach is a “rapist and a predator,” (Exhibit “F”) criticizing Leach’s activities during the “MLK Day of Service” with a non sequitur “reminder” that “Daylin is credibly accused of raping a 17 year old....” (Exhibit “G.”) Snyder made these false claims against Leach knowing them to be false at the time of their making or with reckless disregard as to the truthfulness of these claims predicated on Taylor’s made-up accusation against Leach.

40. And at a recent protest march in Center City Philadelphia, Snyder lured a gaggle of unsuspecting protestors off their route with her bullhorn, imploring her unwitting audience, on

the basis of her knowingly false accusations, to contact Leach and demand that he resign (Exhibit “H”) because “we’re done with rapists holding office.” (Exhibit “I.”) Snyder’s efforts, initially directed at those physically present, were captured on video and rebroadcast over the Internet.

41. Similarly, Kennedy, in an unsolicited response to a post announcing a public open house appearance to discuss public health issues, announced she would not be attending Leach’s open house because “He statutory raped [Taylor],” a factual representation which she knew and knows is false. (Exhibit “J.”)

42. Elsewhere and at other times Kennedy wrote with malice and/or reckless indifference to the truth that “Daylin Leach sexually assaulted [Taylor] when she was 17 years old” (Exhibit “K”), and accused Leach of “prey[ing] upon the most vulnerable.” (Exhibit “L.”)

43. Emboldened by Snyder’s and Kennedy’s malicious advocacy, Taylor, by the fall of 2018, had adopted not only her co-conspirators’ tactics but their rhetoric as well, increasingly referring to Leach as “my rapist,” a knowingly false claim. (Exhibit “M.”)

44. Not satisfied with confining these malicious attacks to the Internet and individuals who could be physically reached at public gatherings, Taylor, with upon information and belief the advice and encouragement of Snyder and Kennedy, fabricated a “private criminal complaint” in November 2018 setting forth in salacious detail one version of the fictional 1991 encounter with Leach that she previously refused to confirm under oath.

45. But just as she had been unwilling to share her fabricated story under oath at her mother’s PCRA proceeding, Taylor conveniently declined to sign her purported “complaint” in November 2018 thereby avoiding the admonition contained therein that by signing the document, she verifies, subject to criminal penalty, the truth of the facts alleged. (Exhibit “N.”)

46. And rather than submit the November 2018 “complaint” to the appropriate authorities, Taylor, with upon information and belief the assistance of her co-conspirators Snyder and Kennedy, distributed the unsigned and unsworn document, albeit styled as a private criminal complaint, to the offices of Leach’s colleagues at the state capital in Harrisburg, which has since caused the senate leadership to initiate an independent investigation.

47. Although relieved Taylor’s fabrication will finally be subjected to scrutiny and confident that any investigation will confirm what has been known to all three of the defendants from the start—that Taylor’s malicious accusation against Leach is categorically false—Leach and his family have nevertheless suffered and continue to suffer harassment, humiliation, and embarrassment as a result of the defendants’ obscene misconduct.

48. Not only has the oft-repeated, demonstrably-false allegation by Taylor against Leach besmirched the reputation of Leach and materially affected his ability to perform some duties of his public office, but his family has been similarly affected.

49. Leach’s minor children have been subjected to public ridicule and harassment, and his wife developed health issues, including loss of feeling in her extremities, necessitating a diagnostic brain scan, as a result of the stress of the highly humiliating and public false attacks.

50. As a result of the actions of the defendant, the plaintiff has been subjected to numerous other people posting on social media, calling him a “rapist” and a “creep” and an “abuser” and demanding his resignation.

51. The public incitement based on the defendants’ malicious and wrongful conduct delineated in this pleading has even compelled Leach to recently upgrade the security systems installed at his private residence out of concern for his safety and that of his family.

52. And defendants, themselves, have even confirmed the sole sick objective of their unconscionable defamatory assault on Leach through a recent Internet post by Snyder: “Y’all, I’m a sexual misconduct accountability trophy hunter these days. I have Marcel Groen’s head on my wall, a place next to it reserved for Daylin’s, and plenty of space left over for more[.]” regardless of truth, basic common decency, or the Law. (Exhibit “O.”)

**Count I – Defamation**  
**(Leach v. All Defendants)**

53. Plaintiff incorporates by reference the averments contained in the foregoing paragraphs of plaintiff’s Complaint as though fully set forth at length herein.

54. Defendants published the above-mentioned statements, innuendos and implications concerning Daylin Leach on repeated occasions as set forth above and in the attached exhibits.

55. Each of the statements, innuendoes and implications concerning Leach were false and defamatory.

56. These statements, innuendoes and implications accuse Leach of criminal conduct and thus are defamatory *per se*.

57. The above-mentioned statements, innuendoes and implications concerning Leach were published to individuals, including individuals in Philadelphia County, who understood said statements, innuendos and implications to refer to, and defame, Leach.

58. Defendants knew that the statements, innuendoes and implications concerning Leach were totally false. In the alternative, Defendants Snyder and Kennedy made the statements, innuendos, and implications with a reckless disregard for their truth or falsity.



59. Defendants maliciously published, republished and distributed the aforementioned defamatory statements, innuendoes and implications concerning Leach, knowing that they were false, or with reckless disregard for their truth or falsity.

60. Defendants' false and defamatory statements, innuendoes and implications have severely injured Leach in that they have tended to: (a) blacken and besmirch Leach's reputation; (b) expose Leach to public contempt, ridicule or hatred; (c) convey the impression that Leach is a rapist, a criminal, and a sexual predator; (d) detract from Leach's respect as a state senator in Pennsylvania, (e) subject Leach to embarrassment and humiliation within the Commonwealth and local community; and (f) interfere with Leach's ability to conduct some of his duties as an elected official.

61. Each of the aforementioned defamatory statements, innuendoes and implications was understood by third parties, including in the Philadelphia area, to pertain to, and defame, Leach.

62. Defendants' defamatory publications were so outrageous and malicious as to warrant the imposition of punitive damages.

63. As a proximate result of defendants' malicious, intentional and/or reckless publication of these false and defamatory statements and innuendos, Leach's good name and reputation has been and will continue to be harmed, and Leach is entitled to such damages as will compensate Leach for the injury to his reputation, as well as punitive damages to punish the defendants for their conduct and deter them and others similarly situated from like acts in the future.

WHEREFORE, plaintiff Daylin Leach demands judgment against defendants Cara Taylor, Gwen Snyder and Colleen Kennedy, jointly and severally, in an amount of compensatory

damages in excess of Fifty Thousand Dollars (\$50,000.00), together with interest and costs, and punitive damages in an amount which will punish the defendants for their conduct and deter them and others similarly situated from like acts in the future.

**SPRAGUE & SPRAGUE**

By: /s/ Joseph R. Podraza, Jr.  
Joseph R. Podraza, Jr., Esquire

**VERIFICATION**

I, Daylin Leach, am the plaintiff in the subject action and verify that the statements in the foregoing document are true and correct to the best of my knowledge, information and belief. I do further understand that these statements are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

Date

1/25/18

Hon. Daylin Leach

A handwritten signature in black ink, appearing to read 'D. Leach', written over a horizontal line.

# Exhibit A

COURT OF COMMON PLEAS OF LEHIGH COUNTY  
CRIMINAL DIVISION

\* \* \*

COMMONWEALTH OF PENNSYLVANIA :

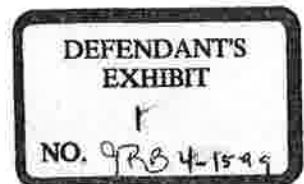
VS

: No. 1186 of 1991

KATHLEEN SPETH

:

\* \* \*



TESTIMONY OF CARA KUHN

As heard before the Honorable Lawrence J. Brenner on Tuesday and Wednesday, June 9 and June 10, 1992.

\* \* \*

**APPEARANCES:**

MICHAEL P. MCINTYRE, ESQUIRE  
FIRST ASSISTANT DISTRICT ATTORNEY  
For the Commonwealth

DAYLIN LEACH, ESQUIRE  
For the Defendant

\* \* \*

Judith M. Palmer, RPR  
Official Court Reporter



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1 BY MR. LEACH:

2 Q Try to make it reach me, Cara, when you  
3 speak. How old are you now, Cara?

4 A 18.

5 Q Okay. Where do you presently reside?

6 A I live at [REDACTED] in  
7 Allentown.

8 Q Okay. How long have you lived there?

9 A Two years now I would say.

10 Q Okay. Do you know Kathy Speth?

11 A Yes, I do.

12 Q And who is Kathy Speth to you?

13 A She is my mother.

14 Q Okay. And do you know Delwyn Speth?

15 A Yes, I do.

16 Q And what is -- How do you know him?

17 A He is my stepfather.

18 Q Okay. Cara, do you know of your own  
19 knowledge whether your mother attempted to kill  
20 Delwyn Speth on February 28th?

21 A I know my mother didn't do it.

22 Q How do you know your mother didn't do did?

23 A I did it.

24 Q Now, Cara, I am going to go through this in  
25 detail with you. First, I would like to ask you a

1 A I was living at [REDACTED].

2 Q And who were you living with?

3 A My boyfriend, Scott.

4 Q Were you guys married at the time?

5 A No, we were not.

6 Q Okay. How did you support yourself at that  
7 time?

8 A I was dancing. I was an exotic dancer at  
9 the time.

10 Q Okay. I am sorry, Cara, but what is an  
11 exotic dancer? Can, if you you can tell the jury.

12 A We, we dance. We dance exotically in bars.  
13 Take our clothes off in front of strangers for a  
14 lot of money.

15 Q Okay. And were you of age at the time?

16 A No, I was not.

17 Q Then how did you manage to get into the  
18 bars to do this?

19 A Nobody really ever asked me, you know. I,  
20 when they did, I just wouldn't work at that place.  
21 I'd go down the street.

22 Q Okay. Where were you working on the  
23 evening of February 27th/28th?

24 A I was at the Grandview Inn in Gouldsboro  
25 off of Route 380.

1 A Yeah.

2 Q Kind of like you lied to --

3 A That was, that was in my interest.  
4 Something like that. I was protecting myself.

5 Q Right.

6 A I'm not doing that now.

7 Q Kind of like you lied to your stepfather  
8 about being married to Scott King, right? If it's  
9 in your interest you're going to lie, right?

10 A I'm not going to, no. But I have.

11 Q Okay. Let's look into this and see if --

12 A I am not saying I'm a Saint. I never said  
13 that.

14 Q I don't think anybody is saying that.

15 MR. LEACH: Objection, Your  
16 Honor.

17 THE COURT: Objection  
18 sustained.

19 BY MR. MCINTYRE:

20 Q Let's look into whether or not you have an  
21 interest in whether your mom gets convicted.

22 A I already said yes, I do.

23 Q Do you have an interest?

24 A I don't want to see her go to jail, no.

25 Q And you have told us that if it's in your

1 interest you are prone to lie, is that right?

2 A Yes.

3 Q Okay. Now, you have various interests in  
4 this case, don't you? First of all, as you said  
5 before, you love your mother and you hate Delwyn  
6 Speth, according to you, right?

7 A Yes.

8 Q All right. Hated him enough to kill him,  
9 right?

10 A Yes.

11 Q So I take it that if you hated him enough  
12 to kill him, you hate him enough to get on that  
13 witness stand and lie if it would hurt him, is  
14 that a fair statement?

15 A No, because I'm not lying.

16 Q All right. Let's, let's analyze this one.  
17 You hate a person enough to kill them, to take  
18 their very life from their body, but you don't  
19 hate him enough to lie on the witness stand about  
20 him, is that what you're telling us?

21 A It would hurt me if I was up here lying. I  
22 don't want to hurt me. I don't care about him at  
23 all.

24 Q What if you thought you could get away with  
25 it?



# **Exhibit B**

COURT OF COMMON PLEAS OF LEHIGH COUNTY, PENNSYLVANIA  
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA)

VS.

No. 1991/1186

KATHLEEN SPETH.

Defendant

NOTES OF TESTIMONY

PCRA PETITION HEARD APRIL 15, 1999

BEFORE THE HONORABLE LAWRENCE J. BRENNER

APPEARANCES:

CHARLES SIEGER, ESQUIRE  
... for the Defendant

MICHAEL McINTYRE, ESQUIRE  
... for the Commonwealth

CRIM. DIV. JUVENILE  
LEHIGH COUNTY, PA

1999 APR 29 PM 12:03

FILED

Court Monitor:

Gloria Reed Bobo

\* \* \* \*

RECORD FILED IN SUPERIOR COURT

APR 27 2000

EASTERN DISTRICT

RECORD FILED IN SUPERIOR COURT

JUL 18 1999

EASTERN DISTRICT

(70) CP

10/98D

FOR FILING ONLY - CRIMINAL DIVISION

1 A. Two and a quarter years ago I did.

2 Q. And it took about a year for the transcript to be  
3 prepared, did it not?

4 A. Fourteen months.

5 Q. Now, Kathleen, in your Petition For Post  
6 Conviction Collateral Relief you've alleged a number of  
7 things, and I want to go through those things with you.  
8 Okay?

9 A. All right.

10 MR. SIEGER: With the  
11 Court's indulgence for a moment.

12 Q. Now, one of the things that you allege in your  
13 Petition concerns your Attorney, Daylin Leach, and his  
14 involvement with your daughter, correct?

15 A. Yes.

16 Q. You and I have talked about that. Have we not?

17 A. Yes.

18 Q. And we've talked about the pros and cons of  
19 following up with that allegation, have we not?

20 A. Yes.

21 Q. Whether it would be advisable or --

22 THE COURT: Well, let me  
23 say this. I am not going to -- basically we are here today,  
24 this is your hearing. Getting another one of these Post  
25 Conviction Relief Acts one way or another, depending on

10-980

10-980 10-980 10-980

1 what I would do, will not come easy under the present  
2 law. Today is the time, Mrs. Speth. If there is anything  
3 here now is the time to present the testimony. But  
4 certainly you are free to do as you deem appropriate.

5 MR. SIEGER: And that's  
6 what I'm attempting to investigate here.

7 Q. Miss Speth, your daughter subsequent to your trial  
8 was charged with and convicted of perjury, was she not?

9 A. Yes.

10 MR. McINTYRE: Your  
11 Honor, may I pose an objection? I know that you want to  
12 grant some leeway. Everything has been leading out of  
13 Attorney Sieger. We should get it from --

14 THE COURT: The objection  
15 to the form is sustained.

16 MR. SIEGER: Okay.

17 Q. Was your daughter charged with a crime after your  
18 trial?

19 A. Yes, she was charged with perjury.

20 Q. And what happened as a result of that?

21 A. She was given a sentence of thirty days to five  
22 years probation.

23 Q. So she was convicted?

24 A. Convicted felon at eighteen years old, yes.

25 Q. And as a result of that have you and I talked about

1 whether or not it would be advisable to continue on  
2 with the allegation that I had mentioned earlier?

3 A. Yes.

4 Q. And what was your decision with regard to making  
5 that allegation?

6 A. Well, in light of the fact that my daughter is a  
7 convicted perjurer, which would prevent any one from  
8 believing her testimony, it really makes no sense.

9 Q. Okay. So as a result of a conversation between  
10 yourself and myself, is it your decision to not continue on  
11 with that allegation as a -- as a grounds for ineffective  
12 assistance of counsel by Attorney Leach?

13 A. Well, there were two parts --

14 Q. Just that one ground.

15 A. (No response)

16 Q. Did you -- did you decide that that one allegation,  
17 concerning Mr. Leach's ineffective assistance of counsel,  
18 would not be followed concerning his alleged involvement  
19 with your daughter -- sexually?

20 A. Yes, that portion.

21 Q. Now, the -- and Attorney Leach, was he private  
22 counsel or was he appointed to represent you?

23 A. Private.

24 Q. Did you pay him?

25 A. A thousand dollars. And he agreed to wait for the

T0380

FORM JUDGE BORD A • REVISED 1-20-01-000



1 her the risks and what she'd be giving up. Which I  
2 believe Judge Brenner explained to her again the day of  
3 sentencing.

4 At no time did I coerce her to withdraw her  
5 appeal. There is no advantage to me of her withdrawing  
6 her appeal. And, you know, the only contribution I made  
7 to that was to tell her a new trial would have to be without  
8 her alibi witness.

9 I know that doesn't address all of it, but that's the  
10 one thing I really wanted to say.

11 The second thing -- one other thing I really  
12 wanted to say for the record. Which is that I, you know,  
13 Cara would come to my office, I don't know, relatively  
14 frequently, I'd say every other week on average to drop  
15 off something or talk to me about her mom. Or she would  
16 always come with her mom, too, when her mom came. But  
17 that's as far as my relationship with her ever went. And,  
18 you know, she told me at the time she would say anything  
19 to get out of -- to get her mother out of this. And I  
20 suppose -- I don't know if that continues or not.

21 But, I just wanted to say that as well. If there is  
22 some other issue you want cleared up, I'll be happy to do  
23 it.

24 MR. McINTYRE: I've no  
25 further questions. You may cross examine.

# Exhibit C

# Woman gets jail term for lying at mom's trial

By DEBBIE GARLICKI  
Of The Morning Call

A 19-year-old woman will spend 30 days in jail for lying when she testified in her mother's Lehigh County trial.

Cara Vassallo Kunz pleaded guilty yesterday to perjury and obstructing the administration of law.

During her mother's trial last year, Kunz testified that she, not her mother, tried to kill Delwyn Speth with car exhaust fumes.

Speth, then 62, was married to Kathleen Rita Speth, Kunz's mother, for eight years. In February 1991, he awoke to a strange odor and discovered a 43-foot-hose running from their car in the garage to his bedroom door in their Upper Macungie Township home.

Mrs. Speth, then 47, was convicted of attempted homicide and is serving five to 10 years in state prison.

Notes that amounted to a recipe for murder and included dollar estimates of death benefits and plans after Delwyn's death were found in a locked room of the house.

Kunz, a surprise witness for the defense, testified that she hooked up the hose because she hated her stepfather and wanted to kill him.

Lehigh County Judge Lawrence J. Brenner yesterday sentenced Kunz to 30 days to one year in jail and a consecutive four years' probation.

Kunz will be allowed to start serving the sentence Monday morning to give her time to make arrangements for her two children, ages 2 years and 5 months, to go to New York with relatives. Kunz is separated from her husband.

Brenner ordered Kunz to do 250 hours of community service.

Michael McIntyre, first assistant district attorney, said he wanted Kunz to get a taste of jail and a long period of probation.

Not everyone who fibs in court is charged with perjury, but Kunz's lie was one of "monstrous proportions," he said.

"We have to send a message to people who come to court and take an oath," McIntyre added.

Kunz was contrite and said, "One thing I've learned through all this is to keep my mouth shut."

Kunz, who was living in a Trexlertown mobile home park when she was arrested last year, told the judge she lied to help her mother.

Assistant Public Defender Earl Supplee asked the judge to consider Kunz's youth and lack of a criminal record.

Supplee said children will do much for the love of a parent, and Kunz was trying to protect her mother.

He said 30 days in jail would be sufficient to send a message to the community that you shouldn't lie in court.

# Exhibit D





Cara Taylor

February 13 at 12:22am · 🌐

<http://www.philly.com/.../comment.../tktktk-opinion-20180107.html>

Don't be like me; don't keep the secrets of your abusers. You deserve better. You don't deserve to be embarrassed or ashamed for what was done TO you. I was wrong to do that. No more.

The Article below is one that Senator Daylin Leach had published, (which does not allow comments) and it is titled: "What I have Learned." You can read it if you like, but everything that I have in quotes is what he said in the article. It is his response to the allegations of sexual harassment from numerous other women. Since the Senator is allowed to publish his "opinion" without allowing comments, this is my response:

Cara Taylor: What I've learned is that Daylin Leach is a liar. I know because I am a liar, too.

"The last few weeks have given me time for introspection."

I believe you. It's an awful thing to get caught in a web of lies. I have had 25 years to devote to introspection because of mine. Do you remember those lies? They were the lies that you knew about, encouraged and then finally used against me to protect yourself. My felony record remembers them. So does every employer who ever refused to hire me and every landlord who cringed at the thought of renting to me. My now grown children remember them, too. Those lies are the reason I couldn't attend their school field trips or volunteer for their classroom parties.

"Prior to the recent story about me in the Inquirer, I was aware that reporters were calling dozens of my employees, former employees, acquaintances, and opponents to ask them if I had ever made them or anyone they knew uncomfortable. That sort of scrutiny tends to put one in survival mode, triggering something akin to a flight-or-fight response. When the story finally came out, I was angry and defensive. I lashed out, which I regret."

That foresight must have been nice. What did you do with all that prep time? What you did to me, what you had planned for me, I never saw it coming. Were you scared once you knew? I was petrified. What were you angry about? Yeah, getting caught sucks, I know. You told me I never would; you must have believed the same thing for yourself. It's not fun to have the newspapers say mean things about you, is it? I know. They said mean things about me, too, but they were all true. Are they lying about you? Does everyone lie except for you? Survival mode you say? I've been in survival mode for the last quarter of a century, you'll get used to it, I did. Menial work for minimal pay isn't so bad once you accept the fact that that's all you'll ever qualify for, if you're even lucky enough to get that. Be grateful if you don't end up with nightmares or an uncontrollable twitch either, because I still haven't figured out how to avoid those things. You have regrets? Welcome to

You give up thinking you will ever be able to adequately provide for your family. You give up thinking that anyone will ever believe anything you have to say, ever again. You give up wondering if you'll ever be given forgiveness. You realize your best years are behind you because the world knows your shame and self-loathing. Oh, wait, no, you should be ok. Forget everything I just said. Those things only happen to people who are sorry for what they did, not sorry that they got caught.

"As I began trying to reckon with what happened, I reached out to friends, colleagues, and even some people who don't think very highly of me. I did a lot of listening."

I believe this, too. It's a good strategy. Knowledge is power. Gotta know what people will say so a believable defense can be manufactured. I remember. It just didn't work out so well for me, did it?

"I learned that I have been largely oblivious to the nature of power dynamics and privilege, both between men and women and between employers and employees. I have never considered myself very powerful or intimidating. I have never been comfortable with a hierarchical structure and have always tried to create working environments that were informal and relatively egalitarian. Thus, I was under an incorrect assumption that anyone who had an issue with me would feel free to address me directly. I now understand that people, especially young women, might be reluctant to approach me with concerns about humor they aren't comfortable with."

I believe you learned all about the nature of power dynamics and privilege when you tested them out on me 25 years ago. Am I wrong? Was there a child or a young woman before me? Do you think I felt free to directly address you with any concerns I had when you drove me to your apartment, miles from my home, under the guise of "helping my mother who had no money and needed a lawyer" while you laid naked on your bed stroking your erection, directing me to "come help you out"? Were you being humorous? Was it all just a joke? Did you think my tears, soaking into the berry lubricant you poured on yourself, were funny? Power and intimidation were your weapons of choice. To use those tools now, incorporated into such a transparent statement, gives me an even bigger, more horrific sense of responsibility towards all of your victims over the last 25 years than I already had.

"I also asked people if I had ever done anything to make them uncomfortable. Frankly, I was looking for reassurance, hoping for responses like "Absolutely not, Daylin." There was a good bit of that, which I am grateful for. But some people were candid in telling me that my humor could be off-color or offensive. Some told me they had been offended by my humor in the past, while some told me others might feel that way."

Frankly, if you ever thought a 17 year old girl was comfortable being cornered and assaulted by a 30 year old man who held the literal life of herself, her mother and her little sister in his hands was a comfortable feeling, then I have absolutely no ability to forgive you whatsoever. I'm not that big of a person. I don't even want to be.



"I also asked people if I had ever done anything to make them uncomfortable. Frankly, I was looking for reassurance, hoping for responses like "Absolutely not, Daylin." There was a good bit of that, which I am grateful for. But some people were candid in telling me that my humor could be off-color or offensive. Some told me they had been offended by my humor in the past, while some told me others might feel that way."

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"My discussions with others didn't end at humor. I have always been a somewhat touchy person in conversation with both men and women and, therefore, I always assumed it was OK. But not everyone has the same comfort level with touching. It never occurred to me to even think about this before, which I am mortified to admit."

I believe you did and do believe that your touching is OK. Did I teach you that it was OK because I was too afraid to say no? Did you think you had a right to do what you did to me because I was just a stripper and I needed your help? Are you mortified? I was, too. I still am. Every once in a while I would hear something about you on the news, or see something about you in the newspaper, and I would get mortified all over again. I got rid of cable. I stopped reading newspapers. Then I was only mortified when the felony you helped orchestrate against me would prevent me from living anything even remotely resembling a full and complete life by being able to enjoy even the simplest of pleasures. Mortified is a good word. I don't think you know what it means.

"All of this has left me shaken. It has also taken a toll on my family and staff."

Yeah. Me, too. For 25 years. And there's no end in sight for me or mine. I take it you consider the last 25 years of your life productive, prosperous... not me; not my life. I don't feel sorry for you.

"I spent my childhood in profoundly uncomfortable situations. I had very limited parental contact, no siblings, and lived in a series of challenging foster homes. I learned early on that humor and personal contact were ways to make friends and put people at ease. This is not an excuse, but an explanation. While many people have said positive things about my humor over the years, it is clear now that my sense of what is and is not welcome in a given situation has, at times, been flawed. I was sometimes impulsive and thoughtless. That needs to change. I should never put humor before kindness."

Uncomfortable situations as a child, you say? Me, too. You weren't the first pedophile to violate me. My sister's father was a disgusting pervert, too. I had a bible thumping hypocrite for a step father who made life so unbearable that I left home when I was 15 and a mother who wanted me to take the blame for her attempted murder rap; you think that was the first time she

## Suggested



1,312 men



Keystone (9 friends)

## People You



1

English (US)  
Português (PT)  
Deutsch

Privacy · Terms  
Cookies · Mobile  
Facebook ©

Uncomfortable situations as a child, you say? Me, too. You weren't the first pedophile to violate me. My sister's father was a disgusting pervert, too. I had a bible thumping hypocrite for a step father who made life so unbearable that I left home when I was 15 and a mother who wanted me to take the blame for her attempted murder rap; you think that was the first time she successfully manipulated me? But you know what? I did what I did. I made choices. I was impulsive and thoughtless. I was also a child when I was impulsive and thoughtless. I didn't continue my behavior into adulthood and I didn't make excuses, or explanations, to continue hurting other people. You need a new excuse.

"As I've contemplated where to go from here, one thing is certain: I am truly sorry for ever saying or doing anything that has made anyone uneasy, uncomfortable, or distressed. If there is any way to make things right, I want to do that. If anyone wants to contact me to talk about this, I'm easy to find and eager to listen."

Are you contemplating where to go from here? Let me help you out; IT SHOULDN'T BE THE CONGRESS OF OUR UNITED STATES. People like you should not be allowed to govern over an entire population of people. And I know how you feel. I was 18 years old with a brand new baby and a 15 year old little sister, with my mother in jail and no where to go. I contemplated, too. With your help, I became a bonafide liar, a perjurer, a felon, and I contemplated where to go for 25 years. Every time I needed a job, I contemplated. Every time I was afraid someone recognized me, I contemplated. Every time I wasn't allowed to participate in a school function with my children, I contemplated. When I stayed in a loveless marriage because I knew I could never make enough money to support my children by myself as a felon, I contemplated. Every time someone had wronged me and I had an opportunity to right it and decided against justice for myself or my family because I knew no one would believe a lying felon, I contemplated. Every time I wanted to volunteer in my community and was told no, I contemplated. Every time I allowed myself to believe that I was more than what I was being allowed to be, I contemplated. Are you certain of one thing? I am, too. I am certain that you are not sorry for anyone but yourself. If you were, your deplorable, abusive, justified in your own mind behavior would not have continued for the last 25 years. And for the record, I will not be contacting you to talk about this. The fact that you think anyone would just goes toward your blatant arrogance. Do not contact me. I am afraid of you. I do not want you physically near me ever again.

"The novelist Craig Silvey wrote that an apology "doesn't take things back, but it pushes things forward." I think the best way for me to apologize is to change my conduct. I promise to do that."

Do you like quotes? Here's one: "I have learned silence from the talkative, tolerance from the intolerant and kindness from the unkind; yet strangely enough, I am ungrateful to these teachers." Khalil Gibrah. Thankx for all the lessons. You can stop anytime now. I'm not grateful.

Suggested



1,312 me



Keystone  
9 friends

People Yo



English (U  
Português  
Deutsch

Privacy T  
Cookies  
Facebook



Do you like quotes? Here's one: "I have learned silence from the talkative, tolerance from the intolerant and kindness from the unkind; yet strangely enough, I am ungrateful to these teachers." Khalil Gibrah. Thankx for all the lessons. You can stop anytime now. I'm not grateful.

"I am trying to learn. I know this won't satisfy everybody, but hopefully, over time, any skeptic will be convinced of my sincerity. I believe that there must be room for growth and forgiveness on this issue and in all areas of life."

Sorry, but this skeptic knows better because I believe the women who spoke out against you, after you did what you did to me. And I know you're wrong about growth and forgiveness, too. Felons don't ever get either of those. My growth has been stunted for 25 years and there is no one to forgive me for what I did. My sin remains written and viewable for anyone with a computer and \$10. And as petty as I'm sure this makes me, I'm glad yours finally is, too. Maybe this will finally stop you from hurting others.

"We are living through a time in which humanity seems to be in desperately short supply. I hope we can all look at each other as flawed human beings who are constantly trying to improve. I promise that is what I will be trying to do."

No we aren't and you are lying. With obvious exception, people are generally good, decent, caring human beings who don't use their power and positions and influence to hurt other people. There is a marked difference between a one time momentary lapse in judgement, and consistent self serving, deplorable behavior that greatly affects the lives of others, viewed as "humor". I have grown up and I no longer believe your lies. You should do the same.

IF I AM LYING I WANT YOU TO SUE ME.

Cara Taylor; daughter, mother, wife, grandmother, felon.



Daylin Leach: What I've learned | Opinion - Philly

## Sign the petition: Senator Leach: Time's Up

I just signed a petition to Sen. Daylin Leach, Pennsylvania State Senator. Despite multiple, credible accusations of sexual harassment, Daylin Leach continues in his bid for Congress. This is unacceptable. We, the undersigned, demand that Daylin Leach...

PETITIONS.MOVEON.ORG

See who else is talking about this petition

See Posts

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 Comment

 Share



 12

4 Shares

View 10 more comments



**John Steitz** Done! I will NEVER vote for a candidate who has clearly engaged in sexual harassment. Not in the Democratic primary. Not in the general election...even if this means a Republican wins the election. (And I know that PA District 4 is a critical seat for the Democrats to take control of the US House of Representatives.) I live in Montco in the proposed PA District 4.

Like · Reply · 4d



**Michael Doyle** Done

Like · Reply · 4d



**Julia A. Ramsey** Please everyone who has signed, share the petition!

Like · Reply · 4d



**Cara Taylor** 25 years ago, when I was 17 years old and Daylin leach was representing my mother, he drove me to his apartment and sexually assaulted me. He then made sure I was convicted of perjury so that no one would ever believe me if I told. Thank you for doing this. Thank you.

Like · Reply · 3d



Write a comment...



**Julia A. Ramsey** updated her cover photo.

...



Cara Taylor

February 25 at 8:37pm · 🌐



I want to apologize to women everywhere, for being such a coward. I am sorry that I feared for my own reputation more than I feared for the future victims of Daylin Leach.

I am sorry that keeping my skeletons hidden was more important than telling someone who mattered.

I am sorry that I was more worried about what people would say about me or how they would judge me than I was of exposing a predator.

I am sorry that I was too wrapped up in my own self pity to realize that I might be able to save someone else from the same fate that I experienced, and that when I did realize it, I ignored it. I am sorry that I chose to ignore it. I am sorry I made that choice time and time again because I did. Because it was the easier thing to do. I chose ignorance and hiding because it was easy. I am so incredibly sorry. It was wrong. I was wrong. I was wrong on so many levels.

I hope that these words don't feel as empty for you as they do for me. I hope that you don't hate me as much as I hate myself. I selfishly hope you can forgive me.

It will NEVER happen again.



Like



Comment



Share



# Exhibit E



**Cara Taylor**  
@AltonsOma

Tweets  
4

Following  
29

Followers  
18

Likes  
6

Follow



**Daylin Leach** @daylinleach · Feb 10

You control all three branches of government NOW. You do know that, right you human abacus? What have you done about #DACA other than ripping families apart?

**Donald J. Trump** @realDonaldTrump

Republicans want to fix DACA far more than the Democrats do. The Dems had all three branches of government back in 2008-2011, and they decided not to do anything about DACA. They only want to use it as a campaign issue. Vote Republican!

15 41 178



**Cara Taylor**  
@AltonsOma

Follow

Replying to @daylinleach

Ripping families apart? Remember when you ripped mine apart? Do you remember when you sexually violated me and then sentenced me to a life of poverty when you conspired to have me convicted of perjury so no one would ever believe me? If Im lying then SUE ME.

11:30 AM - 10 Feb 2018

15 Retweets 26 Likes



9 15 26



Tweet your reply



**Kendall A. Bell** @kashleybell · Feb 10

Replying to @AltonsOma @daylinleach

Riiiiiiight. You're not a bot, or anything. Entirely credible. Yup. You're probably not even a woman. How's the weather in Moscow?

1





Cara Taylor shared Julia A. Ramsey's post.

February 24 at 4:56pm · 🌐



Julia A. Ramsey

February 23 at 1:16pm · 🌐

With multiple credible accounts of misconduct, Senator Leach is unfit for office. We must have a clear line of zero-tolerance for sexual misconduct for office h...

See More

ADD  
YOUR  
NAME

Sign the petition: Senator Leach: Time's Up

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Like · Reply · 4d



1



**Michael Doyle** Done

Like · Reply · 4d



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Like · Reply · 4d



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Like · Reply · 3d



**Cara Taylor** @AltonsOma · Feb 24



**MoveOn.ORG**  
Petitions

### Senator Leach: Time's Up

I just signed a petition to Sen. Daylin Leach, Pennsylvania State Senator: Despite multiple, credible accusations of sexual harassment, Daylin Leach contin...  
[petitions.moveon.org](https://petitions.moveon.org)



**Cara Taylor** @AltonsOma · Feb 21



Replying to @anna\_orso

25 years ago, when I was 17, while he was representing my mother, this man drove me to his apartment and sexually assaulted me. How is he allowed to govern over an entire population of people?



**Cara Taylor** @AltonsOma · Feb 10



Replying to @daylinleach

Ripping families apart? Remember when you ripped mine apart? Do you remember when you sexually violated me and then sentenced me to a life of poverty when you conspired to have me convicted of perjury so no one would ever believe me? If Im lying then SUE ME.







**Cara Taylor** @AltonsOma · 21m



Replying to [@GovernorTomWolf](#)

How is it that Senator **Daylin Leach**, who drove me to his apartment when I was 17 and sexually assaulted me, and who has hurt others, is allowed to grandstand from a podium, on these issues? Completing work for victims should include not having predators involved in these issues.



1





**Cara Taylor**

@AltonsOma

Follow

Replying to [@pghNORML](#) [@JohnFetterman](#) and 2 others

Your cause is great, but Senator Daylin Leach is not. When I was 17, he drove me to his apartment and sexually assaulted me and he has hurt others since then. I don't know why anyone would support a predator.

9:44 AM - 26 Sep 2018

1 Retweet





**Cara Taylor** @AltonsOma · 6m



Replying to @CeaseFirePA @daylinleach

When I was 17, senator **Daylin Leach** drove me to his apartment and sexually assaulted me, and has hurt many others since. Now you know.

[facebook.com/cara.taylor.18...](https://facebook.com/cara.taylor.18...)



1





**Cara Taylor** @AltonsOma · 21m



Replying to @GovernorTomWolf

How is it that Senator **Daylin Leach**, who drove me to his apartment when I was 17 and sexually assaulted me, and who has hurt others, is allowed to grandstand from a podium, on these issues? Completing work for victims should include not having predators involved in these issues.



1





**Cara Taylor**

@AltonsOma

Follow

Replying to @pghNORML @JohnFetterman and 2 others

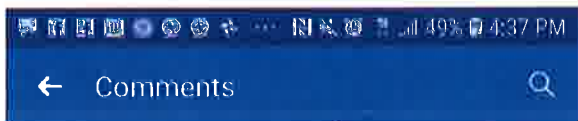
Your cause is great, but Senator Daylin Leach is not. When I was 17, he drove me to his apartment and sexually assaulted me and he has hurt others since then. I don't know why anyone would support a predator.

9:44 AM - 26 Sep 2018

1 Retweet



# Exhibit F



wasted your time. You could have as... See More

2m Like Reply



**Gwen Snyder**

Turea, grappling and asking questions is totally part of this work.

And Colleen said she *\*isn't\** saying you should be kicked out. I'm not either.

But this is a group about supporting survivors of sexual assault by powerful men and having their backs.

Daylin is a rapist and a predator, a fact confirmed by multiple women in this group.

If you don't believe them, you certainly have a right to that opinion. however



Write a reply...





**Daylin is a rapist and a predator, a fact confirmed by multiple women in this group.**

**If you don't believe them, you certainly have a right to that opinion, however disappointing I find it.**

**But If you don't believe them, I don't understand why you would want to be involved in a movement about supporting and believing survivors and in particular survivors of powerful politicians.**

**And I'll say for myself, we started talking after the Daylin party, and I was really excited to work with you and tried to be really vulnerable and honest. It made me really sad to find out that you had been part of a host committee for**



Write a reply...





# Exhibit G



Gwen Snyder

14 mins · Facebook for Android · 🌐

...

Pennsylvania Senate Democratic Caucus just illegally deleted several comments, including one from black as activist Blessing Osazuwa calling them out for using a photo of Daylin Leach posing with a young black girl as part of their cute little "go honor MLK by picking up trash" facebook post.

As a reminder, Daylin is credibly accused of raping a 17 year old and committing various acts of sexual misconduct against a number of other young women.

We're already looking to go after Daylin for illegally blocking his government-resourced Twitter from public viewing, and it now it looks like the caucus is fixing to get sued, too.

not a day on.

We seek to follow Dr. King's example by helping others and serving our communities

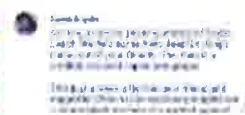
Here's some of the things our Senators did on the MLK Day of Service:

- Helped build trash bins
- Led a citizen advocacy training seminar

👍 Like

💬 Comment

🔖 Save



# Exhibit H

8:54

LTE



3,586 views

3

19

65



**cassie**

@cassieowens

Gwen Snyder, a local activist, addressed the crowd, instructing demonstrators to tweet calls for State Senator Daylin Leach's resignation: "It's time for Daylin to be gone," she said. "He put his twitter on protected status, but that's not going to stop us."

10:43 AM · 1/19/19 · Twitter for iPhone

7 Retweets 24 Likes



**cassie** @cassieowens · 1/19/19

Tweet your reply



# Exhibit I



## Tweet

**Gwen Snyder is uncivil**

@gwensnyderPHL



THANK YOU to all the badass  
[#WomensMarch2019](#) [#philly](#) folks  
who are taking out your phones  
today and letting [@daylinleach](#) know  
that [#TimesUp](#) and we're done with  
rapists holding office.

Together, we win.



12:33 PM · 1/19/19 · [Twitter for Android](#)

8 Retweets 18 Likes

Tweet your reply



# Exhibit J



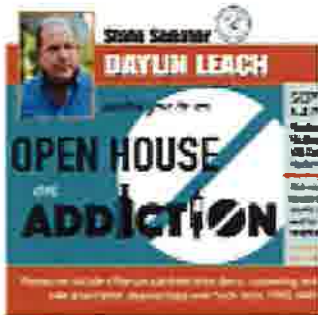
**i believe her.**

@by\_CKennedy

Follow



He statutory raped @AltonsOma so no thanks.



**PaSenateDems**  @PaSenateDems

Does someone you love have a substance abuse addiction?

Visit @daylinleach's Open House on Addiction Tour stop in Narberth on THURSDAY from 6 to 8pm....

8:25 AM - 26 Sep 2018

1 Retweet



Tweet your reply

Case ID: 190102559



# Exhibit K

Cara Taylor Retweeted



**Colleen Kennedy** @by\_CKennedy · 17 Oct 2018

Hi. Daylin Leach sexually assaulted @AltonsGma when she was 17 years old.

**The Field Center** @fieldcenter

Replying to @daylinleach @SenGreenleaf

Thank you @SenGreenleaf and @daylinleach for your leadership, persistence & support of trafficking victims to make Safe Harbor in Pennsylvania a reality. Now on to the Senate and @GovernorTomWolf to make it happen!  
#ChildTrafficking #ChildWelfare #SexTrafficking



1

3



Cara Taylor Retweeted



**Matt Heckel** @MattABC27 · 17 Oct 2018

House Majority Leader Dave Reed says they will not accept bill that doesn't include civil window that allows victims to file suit against institutions.



5

6



Cara Taylor Retweeted



**Everwoman107** @Everwoman107 · 8 Oct 2018

Replying to @daylinleach

To all those praising @daylinleach for his response to this post, please know that he is a serial harasser/abuser of women and should resign immediately. Kthanx.



4

8



# Exhibit L



Colleen Kennedy is with Cara Taylor and 3 others

January 13 at 3:38 PM

I have been asked by a couple of newly elected legislators and their staff what the legislative agenda is for those of us who want Daylin Leach removed from office. I think that question is complicated but in other ways, it's pretty simple.

We don't want a state senator who has preyed upon the most vulnerable in office.

We don't want a state senator in a position to review and vet criminal justice legislation while he stands accused of violating the body of a 17 year old girl.

We want to pass #MeToo legislation, which the last class of legislators failed to do.

So many women worked to get this new class of legislators elected, and I completely understand their desire to prioritize a legislative agenda that helps everyone in their district. It must feel overwhelming, trying to make all these decisions.

I just ask you all to remember a couple of things:

(1) the work to get to this point has taken years. Years. So many have left this work forever because they just couldn't take banging their heads against the wall. I left for awhile, and I'm back. I know that emotional pain.

(2) the vulgarity of the gaudy display in this video, the uninformed women and staffers paid for by Daylin, denying the experiences of my friends and colleagues, should move you to speak out. I hope it will. More than that, I hope you all know that their shrieking attacks and the inaction of others are such a painful betrayal. Are we at the point in this work where we don't have a position on rape?

This past month, especially, has been really difficult for me. I want to let go of my anger and be everyone's friend. I want to feel like we are all in this together, but that isn't how I currently feel. Maybe that's unfair, and only time will tell in that regard. I am trying to hear what others say, and I am trying to breathe out some of my pain and just take things one step at a time, but sometimes that feels impossible.

The solidarity I see in this video, from Daylin's victims and allies who have faced similar sexual violence, is what is best about our progressive movement. I hope people will be moved to act. Thank you.

Important PS: Some of these things, like the minority chairmanship, don't have an immediate solution, but silence isn't the answer. Lending your voice to the future rectification of that wrong will pay off volumes in political capital, and it will prove what we know about you all, that you can fight for what is right.

# Exhibit M





**Cara Taylor** @AltonsOma · 18 Oct 2018

Holy shit. Thats my rapist. Daylin Leach. What kind of a world do we live in when predators get to hide in plain sight?!



**PaSenateDems** @PaSenateDems

.@daylinleach's Safe Harbor bill is now waiting the Governor's signature.

"There is no such thing as a child prostitute. There are...

1 2 3



**Cara Taylor** @AltonsOma · 17 Oct 2018

It is almost unbearable to see my rapist, Senator Daylin Leach, consistently and strategically placing himself behind the podium with true and tireless victims, survivors and advocates. It feels like being abused and turned into a criminal all over again and again and again.



**PA House Democrats** @PahouseDems

.@RepRozzi says he's not going anywhere and he can't stop fighting back against sexual abuse.

2

# Exhibit N

## COMMONWEALTH OF PENNSYLVANIA

COUNTY OF Lehigh

PRIVATE  
CRIMINAL COMPLAINTCOMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT:

NAME and ADDRESS

Daylin Leach  
601 S Henderson Rd Suite 208  
King of Prussia, PA 19406

(Fill in defendant's name and address)

Magisterial District Number:

MDJ Name: Hon.

Address:

Telephone:

Docket No:

Date Filed:

OTN:

(Above to be completed by court personnel)

Notice: Under Pa.R.Crim.P. 506, your complaint may require approval by the attorney for the Commonwealth before it can be accepted by the magisterial district court. If the attorney for the Commonwealth disapproves your complaint, you may petition the court of common pleas for review of the decision of the attorney for the Commonwealth.

Fill in as much information as you have.

Defendant's Race/Ethnicity	Defendant's Sex	Defendant's D.O.B.	Defendant's A.K.A. (also known as)
<input checked="" type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Asian <input type="checkbox"/> Native American <input type="checkbox"/> Hispanic <input type="checkbox"/> Unknown	<input type="checkbox"/> Female <input checked="" type="checkbox"/> Male	06/23/61	Dave Leach, Dutch Laroo
Defendant's Vehicle Information			
Plate Number		State	Registration Sticker (MM/YY)
unknown			

I, Cara P. Taylor

(Name of Complainant-Please Print or Type)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above  
☐ I accuse the defendant whose name is unknown to me but who is described as \_\_\_\_\_

- ☐ I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe.

with violating the penal laws of the Commonwealth of Pennsylvania at \_\_\_\_\_ Apartments

(Place-Political Subdivision)

in Lehigh County on or about Summer of 1991

Participants were: (if there were participants, place their names here, repeating the name of the above defendant)

Daylin Leach



Defendant's Name: Daylin Leach

Docket Number:



## PRIVATE CRIMINAL COMPLAINT

2. The acts committed by the accused were:  
(Set forth a summary of the facts sufficient to advise the defendant of the nature of the offense charged. A citation to the statute allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section and subsection of the statute or ordinance allegedly violated.)

Sexual assault of a minor by forcible compulsion. During the Summer of 1991, during which time the private swimming pool for [REDACTED] Apartments was open and available for use to the residents, Daylin Leach picked me up from my home located at [REDACTED] in Allentown, PA, telling me we had to talk about my mother's case, as he was her criminal attorney, and drove me to his apartment located in the [REDACTED] Apartment Complex where he sexually assaulted me. I was 17 years old, having turned 17 on March 25th of this same year. Upon entering the apartment, after getting himself a drink from the refrigerator, Daylin disappeared into a room and then called my name. I got up and went to where I had heard his voice coming from. I found him naked, with only his socks on, lying on his bed stroking his erection. Daylin then said, "Come help me out". I did as I was told, getting on the bed, on my knees between his legs and put his penis in my mouth. When my tears had visibly annoyed him, he took a bottle of red lubricant from his bedside table and poured it onto his genitals. After he ejaculated, I went into the bathroom to clean his body fluid off of myself and when I returned to his bedroom he was dressed holding his keys. I followed him out the door and he drove me home.

All of which were against the peace and dignity of the Commonwealth of Pennsylvania and contrary to the Act of Assembly, or in violation of \_\_\_\_\_ and \_\_\_\_\_  
(Section) (Subsection)

of the \_\_\_\_\_  
(PA Statute)

3. I ask that process be issued and that the defendant be required to answer the charges I have made.
4. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Complainant

Office of the Attorney for the Commonwealth ☐ Approved ☐ Disapproved because \_\_\_\_\_

\_\_\_\_\_  
(Name of Attorney for Commonwealth-Please Print or Type)

\_\_\_\_\_  
(Signature of Attorney for Commonwealth)

\_\_\_\_\_  
(Date)

AND NOW, on this date \_\_\_\_\_, I certify that the complaint has been properly completed and verified.

\_\_\_\_\_  
(Magisterial District)

\_\_\_\_\_  
(Issuing Authority)

**SEAL**





# **CRIMINAL COMPLAINT FOR USE IN FUTURE CRIMES COMMITTED BY PA SENATOR DAYLIN LEACH**

Written by: Cara Taylor

[REDACTED]  
Bath, PA 18014  
[REDACTED]

My name is Cara Taylor and I am a sexual assault victim. My abuser's name is Daylin Leach and he is currently a PA Senator. I was 17 years old when he assaulted me. He was my mother's criminal defense attorney. Daylin didn't just physically abuse me. He also convinced me, through severe and repeated manipulation tactics, to commit perjury by taking the blame for what my mother had done, and because of this, I have been a felon for my entire adult life. Daylin also convinced me to have a child in an attempt to have a medical reason for a requested continuance of my mother's trial. I was a stripper during this period of my life. Currently, I am a 44 year old wife, mother, and grandmother. I am not a career criminal.

This is my true story.

1990: My age – 16. I first met Daylin at this time when my boyfriend and I needed a lawyer for a landlord/tenant issue. My father came down from New York to pay Daylin for his help with my legal issue. I was living with my boyfriend in an apartment in PA. I had left home when I was 15.

Feb 1991 – My mother (Kathleen Speth, [REDACTED]) was arrested and charged with attempted homicide. She had tried to kill my stepfather (Delwyn Speth). When my mother was arrested, I took my little sister to live with me. Once my mother was bailed out she came to live with us.

Spring 1991 – Due to my mother's continued crying and pleading regarding her fears surrounding having a public defender, I approached Daylin about helping my mother with her case. Daylin accepted.

Spring and Summer 1991 – My age – 16; I turned 17 on March 25 of this year. Daylin had been talking to me on the phone and in person, although it was mostly in person, for weeks. During this time, Daylin would talk to me about how he did not know how to defend my mother unless someone else had done it. He would ask me questions about where I was that night, about my life, about why I had left home at such a young age. He would ask me questions about what it was like to be a stripper, how much money I made, where I worked. He explained to me how I was only 16 when the crime was committed, how the DA would never switch defendants and how even if they did, with me being a juvenile, minimal time would be served whereas my mother was looking at decades behind bars. Daylin assured me that perjury wasn't an option for the DA either, that no one ever got charged with perjury. Every time I would ask him a question like, "What do you want from me?" or "I don't know what to say, what am I suppose to say?" Daylin would tell me to go home and talk to my mother. After weeks and weeks of this, and weeks and weeks of my mother crying about how she didn't know how she was going to get out of this, after talking to my mother about how Daylin wouldn't answer my questions and having her explain to me that there were certain things a lawyer couldn't be involved in, I knew what I had to do. I remember the day I walked into Daylin's office to give both him and my mother what they wanted from me like it was yesterday, and for decades I have taken more than my share of responsibility for this. It was my idea to agree to this plan, but the plan was never my idea.

My assault - During the Summer of 1991, during which time the private swimming pool for [REDACTED]



Apartments was open and available for use to the residents, Daylin Leach picked me up from my home located at [REDACTED] in Allentown, PA, telling me we had to talk about my mother's case, and drove me to his apartment located in the [REDACTED] Apartment Complex where he sexually assaulted me using forcible compulsion. I was 17 years old, having turned 17 on March 25th of this same year. Upon entering the apartment, after getting himself a drink from the refrigerator, Daylin disappeared into a room and then called my name. I got up and went to where I had heard his voice coming from. I found him naked, with only his socks on, lying on his bed stroking his erection. Daylin said, "Come help me out". I did as I was told, getting on the bed on my knees between his legs and put his penis in my mouth. When my tears had visibly annoyed him, he took a bottle of red lubricant from his bedside table and poured it onto his genitals. After he ejaculated, I went into the bathroom to clean his body fluid off of myself and when I returned to his bedroom he was dressed holding his keys. I followed him out the door and he drove me home.

Late Summer 1991 – My age – 17. Daylin told me that he was out of reasons for continuing mom's trial date. He told me that I was a key witness and that if I were to break a leg, get sick, or get pregnant, that he would have a valid reason for asking for a postponement. He said he needed one, that he wasn't prepared at all to defend her. I completely believed this because we never spoke about anything important the way I thought we should have. He told me that if I were to have a baby, that they definitely wouldn't go too hard on me if they decided to come after me for the actual crime. I didn't want to break a bone or get sick, so I got pregnant. I did that. I did that horrible act to two completely innocent lives and have hated myself ever since. My son was born on [REDACTED] 1992, and five days later I turned 18. Daylin got the continuance he wanted and I was an adult when I committed my crime of perjury.

June 9 and 10, 1992 – My age – 18. I turned 18 on [REDACTED] of this year. I spent 2 days testifying that I had done what my mother was accused of. I was the only defense witness.

June 1992 – My mother was found guilty. On the day of this verdict, I was out in the courthouse hall when Daylin told me I had to meet him at his office right away. I did as I was told and walked over. He came out of his office and told me that there was trouble. He said they were coming after me for conspiracy and that he never saw that coming and that it was a bad thing. He told me that I was smart, that I was a good girl, that he was going to call me into his office in a few minutes and that I had to follow his lead and answer his questions, that he knew I would know how to do that. He told me we had to record it. He told me I had to cry. He left me and went back into his office. When he came back to get me, he took me in his office and held his finger up to his mouth (shhh) and pointed to the tape recorder sitting on his desk. He held his hands on his head and sat in his chair while he said "Cara, please tell me I did not just send an innocent woman to jail." I was instantly petrified. I knew something bad was happening, but I didn't know what, and I was so scared, I instantly started crying. I answered all of his questions the way I knew I was suppose to. I knew I was protecting him and me, but I also knew I was no longer protecting mom and that made me feel sick. It didn't last long, and when it was over, he literally pushed me out the door, telling me to go home, that he would call me.

September 2, 1992 – I was charged with perjury and false swearing.

November 12, 1993 – I entered a guilty plea.

November 15, 1993 @9am– I turned myself in, as ordered, to serve my sentence.

December 17, 2017 – An article in the Philly Inquirer came out about Daylin sexually harassing female staff. This same day, I contacted one of the reporters, Angela Coulombis. She met with me and spent months vetting me, only to have her editors pull the story days before publication due to Daylin's lawyers threatening to sue. I was told, ironically enough, that because of Daylin denying any kind of a "relationship" with me in a PCRA hearing, that the paper would basically be accusing him of perjury and that was a pretty bad thing to do, so they would not be printing my story.



Daylin did what he did to me, but there are many other people who failed me during this time, other than my own crazy mother. None of the adult professionals involved in any of this stepped up to help me or to even try to do the right thing. Corporal State Trooper Arsenio Rosa went to the ADA about his witnessing Daylin feeding me answers while I was on the stand, yet Corporal Rosa was the one to fill out and file the Criminal Complaint for perjury against me. Rosa never filed anything against Daylin. My public defender, Karen Schuler, she was made aware of what Daylin did to me and not only did she choose to ignore the information but she then didn't even bother to show up on the day I plead guilty; a man was there to help me and he asked me if I could read. The Disciplinary Board was notified and dismissed the claim. Charles Seiger, a new attorney for my mother, was told also and not only did this man not report the crime that was reported to him, he also talked my mother out of talking about what Daylin did to me during that same PCRA hearing in 1999, while she was on the stand, because I was a felon for perjury. And last but certainly not least, there is former ADA Michael McIntyre, who has admitted, publicly and privately, to knowing what Daylin was "up to" yet refused to notify the proper authorities and instead called for charges against me.

My intent is neither to absolve myself of blame nor justify my crime, but rather to share responsibility with those who deserve to share it with me in an effort to bring attention to the willful ignorance of mandated reporters in the hopes that this type of self-preserving behavior can be prevented from happening to someone else. Blame can be a harmful, ugly thing. Unless it is deserved.

But now, this is no longer about me. It is all too late for me. Twenty-seven years have passed and I am as broken or as whole as I will ever be, nothing can change that for me and I am partly to blame for all of it. What can change is the ability of all of us to help the next person. Whoever it is who has come to you with a claim against Daylin, please listen to them and please know that they are not alone. Please know that there is much proof, and many other people, who have been immeasurably harmed by this man; this man who is allowed to make and vote on laws that govern over the rest of us. This man who pretends to be a champion of women's rights, literally surrounding himself with a potential victim pool. Please know that you, as a person in a position of power, hold not only the ability to possibly right a wrong to the extent that the law allows, but to also play a large role in saving another victim from all of the crippling effects that come along with feeling powerless against a powerful man and an even more powerful system. Justice can be a harmful, ugly thing, too, and I have rarely been comforted by the meaning of it. What's done is done. Time can't be taken back, hurts can't be undone, lives can't be relived. You can apologize all you want to a broken plate on the floor, but it doesn't change the fact that the plate will never be the same. What can happen, though, what we should strive to have happen, where there might be some small amount of justice, that hopeful reality lies in our ability to prevent the repeated behavior of known predators and real criminals, no matter how powerful they have become.

Please help, however you can, whoever it is who has come to you. Please tell them that they are not alone. Please tell them that I will hate myself forever for what my own inaction has contributed to, in what has happened to them, and while I realize that the utter emptiness of my regret will do nothing to contribute to their wholeness, please tell them that I promise it will never happen again. It will NEVER happen again.

# Exhibit O

