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LEGAL SECTION
Allegheny County
Health Department

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March 12, 2022

County of Allegheny Health Department
Office of the Director
542 4th Ave.
Pittsburgh, PA 15219

Re: 2620 Graham Boulevard
Wilkinsburg, PA 15235
Census Tract: 55614
SR# HCE-20211228-6199

Dear Sir/Madame:

This letter shall serve as my appeal to violations of Sections 629 (c); 622; 632 (a); 662; and 628 A of Article VI of the Allegheny County Health Departments Rules and Regulations.

Appeal is hereby taken as to the identification of the term "tenant" as it relates to Ms. Rhonda Jefferson. As indicated on the Allegheny County Inspection Report , Ms. Jefferson's address is listed as 445 Idlewild Road, Pittsburgh, PA 15235.

The nature of Mr. Croumbles and Ms. Jefferson's relationship was intimate. Mr. Croumbles allowed Ms. Jefferson to spend overnights at his house (2620 Graham Blvd., Pittsburgh, Pa, 15235). Mr. Croumbles at some point, in or around September of 2021, asked Mr. Jefferson to leave his house after an argument. Please be advised that Mr. Croumbles at no point entered into a landlord / tenant relationship with Ms. Jefferson.

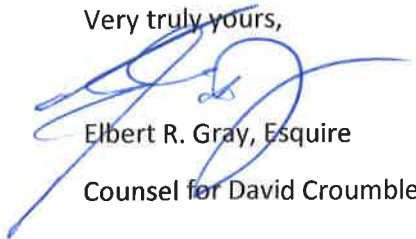
After being asked to leave Ms. Jefferson went and made allegations against Mr. Croumbles and obtained a Protection from Abuse Order The PFA Order, instead of listing Ms. Jefferson's Idlewild Street address, contained Mr. Croumbles Graham Blvd. address as her place of residence. This Order effectively barred Mr. Croumbles from returning to his home. Through legal manipulations, postponing of PFA hearings, and other stall tactics, Ms. Jefferson has managed to keep Mr. Croumbles from re-entry into the very same property which he is still paying the mortgage on and is responsible for the upkeep of the property, payment of utilities, payment of water and sewage, and all other obligations. Furthermore, during the period of her 'squatting' in Mr. Croumbles home, Ms. Jefferson has continuously ran his water bill to an exorbitant amount, ran his light bill to an exorbitant amount (oftentimes leaving the lights on at the property on 24 hours a day, damaged his property, and done numerous other things to him by using this PFA to annoy, harass and displace Mr. Croumbles from his property.

To make matters worse, every attempt to remove Ms. Jefferson from the property by legal means have been unsuccessful. He has gone to the magistrate and got a judgment for possession. That judgement was appealed. He has won an arbitration judgement for possession of his property; that too has been appealed. We are currently awaiting a new date to appear before a Court of Common Pleas Judge to hear this third appeal. Until Mr. Croumbles acquires the ability to legally enter his property, Ms. Jefferson has the ability to "torture" Mr. Croumbles by continuing to remain in his property and run up his bills, as she has vowed to do.

Therefore, as it relates to the Health Department Violations listed above, Mr. Croumbles now faces the very real possibility of losing his home; being forced into bankruptcy; or even worse, thrown in jail for any contact with this woman through any means, including third party communications.

We sincerely hope that this letter of appeal sheds some light on the issue as to whether Mr. Croumbles is intentionally withholding these services from his "tenant" or has merely shifted into a self-preservation mode and look forward to an appeal hearing in this matter.

Very truly yours,



Elbert R. Gray, Esquire
Counsel for David Croumble

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