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On or about July 1, 2005, Leon Jacob was not offered a PGY-2 spot by St. Vincent's due to being "functionally unreliable" and an "inability to focus" and "distracting behavior."

On or about July 1, 2005, Leon Jacob scored in the 21<sup>st</sup> percentile on his ABSITE score.

On or about February 10, 2006, Leon Jacob received the following feedback from Vincent Scarpinato, M.D, including that as a PGY-1 he was often, "inappropriate" with patients and family members. In addition, his behavior was described as, "bizarre" and a number of residents complained that Leon Jacob was a, "potential threat to patients." In addition, due in part to this feedback, the hospital chose not to renew his contract.

On or about January 23, 2009, Leon Jacob was informed the University of Texas Health Science Center, Houston, would not be renewing his residency contract for some of the following reasons:

- Below average ratings for ability to synthesize data and apply to patient care
- Having a false over confidence that jeopardizes decision making
- A lack of insight into own abilities
- A below average rating for professionalism
- Lying about participating in procedures
- Argumentative with staff
- Asking a chief resident to, "make out" in the hall
- Removed from working with students due to inappropriate behavior:
  - Disorganization and tardiness
  - Inappropriate contact with students including telling a student about the size of his penis, visits to prostitutes in Mexico, and various sexual positions.
  - Lying on morning rounds

On or about January 23, 2009, Leon Jacob, harassed Dr. Courtney Rose, by continually calling her and demanding that she change a statement she made about him in Harris County, Texas. The harassment was to such a degree that Dr. Rose had to report the harassment to her superior in an effort to get Leon Jacob to stop.

On or about January 1, 2009, Leon Jacob committed the offense of Assault Family Member, in Harris County, Texas against Annie Morrison, by grabbing the complainant with his hand causing her pain.

On or about January 1, 2009, Leon Jacob committed the offense of Assault Family Member, in Harris County, Texas against Annie Morrison, by pushing the complainant with his hands causing her pain.

On or about January 1, 2009, Leon Jacob committed the offense of Assault Family Member, in Harris County, Texas against Annie Morrison, by kicking the complainant with his foot, causing her pain.

On or about January 1, 2009, Leon Jacob committed the offense of criminal mischief against property owned by Ron Defazio, by destroying sheet rock and placing holes in the walls of his residence in Wexford, PA.

On or about February 25, 2011, Leon Jacob was removed from the premises of Northside Medical Center and told not to return until February 28, 2011 due to anger issues and threats made to superiors.

On or about March 7, 2011, Leon Jacob was placed on probation with Northside Medical Center.

On or about March 18, 2011, Leon Jacob was dismissed from his residency at Northside Medical Center for some of the following reasons:

- Arguing with trauma surgeons in the operating room
- Inability to stay in a surgery for longer than three hours without making an excuse
- An evaluation that stated that he:
  - “Repeatedly showed disrespect to his peers, supervisors and subordinates.”
  - “Profanities were used openly at nursing stations.”
  - Poor interviews of patients along with obtaining inaccurate information
  - Basic science background is poor
  - An ABSITE score in the 7<sup>th</sup> percentile
  - Unacceptable level of clinical and academic performance

On or about April 1, 2011, Leon Jacob committed the offense of Criminal Trespass in Mahoning County, Ohio at Northside Medical Hospital.

On or about April 1, 2011, Leon Jacob threatened Dr. DeVito, in Mahoning County, Ohio.

On or about April 27, 2012, Leon Jacob was observed in a verbal altercation at 6750 Shawbutte, Poland Township, Poland. Leon Jacob was observed pounding on the front door of the residence and screaming, “It’s been more than a fucking minute.”

On or about August 1, 2012, Leon Jacob committed the offense of Injury to a Child against Darren Gooden, Jr., by striking him with his hand, causing him pain.

On or about August 5, 2012, Leon Jacob committed the offense of Menacing (Terroristic Threat) against Darren Goodin in Poland Township, Poland Ohio.

On or about August 29, 2012, Leon Jacob committed the offense of harassment by repeatedly driving by the home of Darren Goodin in Poland Township, Poland Ohio.

On or about September 17, 2012, Leon Jacob violated a no contact order by having contact with Mackenzie Goodin.

On or about December 1, 2012, Leon Jacob admitted that during this time period he was, “violently explosive” in Wexford, Pennsylvania.

On or about December 6, 2012, McCandless Police Department was called to the residence of Leon Jacob. Leon Jacob had taken Annie Morrison's keys and refused to return them.

On or about December 6, 2012, Leon Jacob committed the offense of aggravated assault with a deadly weapon, in Wexford, Pennsylvania, by holding a straight razor to the throat of Annie Morrison and threatening to kill Annie Morrison.

On or about December 6, 2012, Leon Jacob committed the offense of kidnapping, in Wexford, Pennsylvania, by barricading Annie Morrison and C. M. in a bedroom and informing Annie Morrison that the only way she would be leaving the room was, "in a body bag."

On or about December 7, 2012, McCandless Police Department was dispatched to the residence of Leon Jacob because he stated he was going to harm himself.

On or about December 8, 2012, Leon Jacob committed the offense of Burglary of a Habitation against Patricia Goodin, in Poland Township, Poland Ohio.

On or about December 8, 2012, Leon Jacob committed the offense of Criminal Mischief against Patricia Goodin, in Poland Township, Poland Ohio.

On or about December 12, 2012, Leon Jacob committed the offense of aggravated assault in Wexford, Pennsylvania, by throwing a toolbox at Annie Morrison.

On or about December 24, 2012, Leon Jacob committed the offense of telephone harassment, in Northbrook, Illinois, against Annie Morrison, by repeatedly calling her telephone.

On or about December 28, 2012, Leon Jacob committed the offense of Terroristic Threat, against Darren Goodin, in Poland Township, Poland Ohio.

On or about August 1, 2013, Leon Jacob committed the offense of Assault Family Member, in Allegheny County, Pennsylvania, by throwing a chair at Annie Morrison, a member of his family.

On or about August 26, 2013, Leon Jacob was party to civil order FD13-01418-011, in Allegheny County, Pennsylvania. The order required that Leon Jacob not abuse, stalk, harass or threaten Plaintiff (Annie Morrison) in any manner.

On or about September 3, 2013, Leon Jacob committed the offense of Harassing Communication, in Harris County, Texas, by using harassing and abusive communication over the telephone to Annie Morrison.

On or about September 13, 2013, Leon Jacob violated the rules of the Menninger Clinic by attempting to kiss a patient, while in treatment, in Harris County, Texas.

On or about September 23, 2013, Leon Jacob committed the offense of Telephone Harassment, in Northbrook, Illinois, by repeatedly calling the telephone of Annie Morrison.

On or about September 23, 2013, Leon Jacob committed the offense of Trespass, in Northbrook, Illinois against Deborah Morrison.

On or about October 9, 2013-October 10, 2013, Leon Jacob committed the offense of Telephone Harassment, in Northbrook, Illinois by repeatedly calling and texting Annie Morrison.

On or about October 10, 2013, Leon Jacob committed the offense of Telephone Harassment, in Northbrook, Illinois, by repeatedly calling Wendy Carlisle.

On or about October 18, 2013, Leon Jacob committed the offense of Criminal Trespass, in Northbrook, Illinois, by entering the property of Countryside Montessori School, after being informed he was not allowed at said location.

On or about December 11, 2013, Leon Jacob committed the offense of Harassment, in Northbrook, Illinois, by continually calling, texting and emailing Annie Morrison and Deborah Morrison.

On or about December 11, 2013, Leon Jacob committed the offense of violation of a protective order in Northbrook, Illinois, by harassing Deborah Morrison and Annie Morrison.

On or about February 4, 2014, Leon Jacob committed the offense of harassment in Northbrook, Illinois, by continually calling Annie Morrison.

On or about February 4, 2014, Leon Jacob committed the offense of Violation of a Protective Order in Northbrook, Illinois, by harassing Annie Morrison.

On or about February 4, 2014, Leon Jacob committed the offense of Terroristic Threat in Northbrook, Illinois by placing Annie Morrison and Deborah Morrison in fear of serious bodily injury or death. In addition, Leon Jacob threatened Annie Morrison by stating that he was going to "Cut off her father's cock and put it in her dead mother's mouth."

On or about April 21, 2014, an Order of Protection was entered in the Circuit Court of Cook County, Illinois for Leon Jacob protecting Annie Morrison.

On or about June 1, 2014, Leon Jacob stole cash money from Jamie Lynn Reesh in Cook County, Chicago.

On or about August 15, 2015, Leon Jacob falsely held himself out to be a transplant surgeon at Methodist Hospital, in Harris County, Texas.

On or about August 15, 2015, Leon Jacob in Harris County, Texas, was released from his contract with Methodist hospital due to an anger management problem.

On or about August 15, 2015, Leon Jacob in Harris County, Texas was released from his contract with Methodist hospital for mislabeling a donor organ.

On or about December 1, 2015, Leon Jacob committed the offense of Criminal Mischief in Harris County, Texas against M.V.

On or about October 1, 2016, Leon Jacob committed the offense of Aggravated Assault with a deadly weapon, namely a glass, in Harris County, Texas, against M.V.

On or about November 1, 2016, Leon Jacob committed the offense of Theft, in Harris County, Texas against Katy Dickson.

On or about November 24, 2016, Leon Jacob committed the offense of Assault Family Member in Harris County, Texas against Dale Johnston, by striking him with his hand.

On or about November 24, 2016, Leon Jacob committed the offense of Assault Family Member in Harris County, Texas against Dale Johnston by pushing him with his hands.

On or about December 11, 2016, Leon Jacob committed the offense of Terroristic Threat in Harris County, Texas against M.V.

On or about January 12, 2017, Leon Jacob committed the offense of Assault Family Member in Harris County, Texas against M.V., by striking M.V., with his hands.

On or about January 12, 2017, Leon Jacob committed the offense of Assault Family Member in Harris County, Texas against M.V., by grabbing M.V. with his hands.

On or about January 12, 2017 pursuant to a continuing course or scheme of conduct, Leon Jacob committed the offense of Stalking in Harris County, Texas against M.V.

On or about January 12, 2017, pursuant to a continuing course or scheme of conduct, Leon Jacob committed the offense of Telephone Harassment, in Harris County, Texas against M.V. by continually emailing, texting and calling M.V.

On or about February 1, 2017, pursuant to a continuing course or scheme of conduct, Leon Jacob committed the offense of Harassment against J.M.

On or about February 5, 2017, pursuant to a continuing scheme or course of conduct, Leon Jacob committed the offense of Stalking in Harris County, Texas against J.M.

On or about March 1, 2017, Leon Jacob committed the offense of Violation of a Protective Order in Harris County, Texas against M.V.

On or about March 4, 2017, Leon Jacob committed the offense of Harassment in Harris County, Texas against Anna Foster.

Respectfully submitted,

/s/ Samantha Knecht  
Samantha Knecht  
Assistant District Attorney  
Harris County, Texas

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, hereby certify that a true and correct copy of the above foregoing motion was sent via electronic filing, facsimile and/or certified mail to Defense Counsel on this 6<sup>th</sup> day of March, 2018.

/s/ Samantha Knecht  
Samantha Knecht  
Assistant District Attorney  
Harris County, Texas

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