

John H. May, Esquire  
49 North Duke Street  
Lancaster, PA 17602  
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Attorney for Plaintiffs

ENTERED AND FILED  
16 MAY 24 PM 2:37  
PROthonary's OFFICE  
LANCASTER, PA

SHERI L. JACQUEMIN, an Adult Individual  
1175 Sawmill Hill Road  
Torrington, CT 06790

and

SAMUEL E. SELLERS and LINDA S. SELLERS  
Husband & Wife  
1175 Sawmill Hill Road  
Torrington, CT 06790

Plaintiffs

vs.

JOHN M. YELCICK, M.D.  
a/k/a JOHN GASSER  
8320 Meadowsweet Road  
Baltimore, MD 21208

and

ROBERT J. GASSER  
209 Echoglen Road  
Harrisburg, PA 17109

and

4 CRAZY GUYS, LLC  
C/o James Pezzulla  
Pezzulla and Pezzulla, LLC  
Suite 1207  
28 Allegheny Avenue  
Towson, MD 21204

Defendants

IN THE COURT OF COMMON PLEAS  
OF LANCASTER COUNTY,  
PENNSYLVANIA  
CIVIL ACTION - LAW

No. CI-14-04711

JURY TRIAL DEMANDED

**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 notice for any money claimed in the complaint or 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.**

Lancaster Bar Association  
Lawyer Referral Service  
28 East Orange Street  
Lancaster, Pennsylvania 17602  
Telephone Number: (717) 393-0737

**AVISO**

**USTED HA SIDO DEMANDADO EN LA CORTE.** Si usted desea defenderse de las quejas expuestas en las páginas siguientes, debe tomar acción dentro de veinte (20) días a partir de la fecha en que recibió la demanda y el aviso. Usted debe presentar comparecencia escrita en persona o por abogado y presentar en la Corte por escrito sus defensas o sus objeciones a las demandas en su contra.

Se le avisa que si no se defiende, el caso puede proceder sin usted y la Corte puede decidir en su contra sin mas aviso o notificación por cualquier dinero reclamado en la demanda o por cualquier otra queja o compensación reclamados por el Demandante.

**USTED PUEDE PERDER DINERO, O PROPIEDADES U OTROS DERECHOS IMPORTANTES PARA USTED.**

**LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI USTED NO TIENE O NO CONOCE UN ABOGADO, VAYA O LLAME A LA OFICINA EN LA DIRECCION ESCRITA ABAJO PARA AVERIGUAR DONDE PUEDE OBTENER ASISTENCIA LEGAL.**

Servicio de Referido a Abogado  
Colegio de Abogados del Condado de Lancaster  
Calle Orange #28 Este  
Lancaster, PA 17602  
Teléfono: (717) 393-0737

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**COMPLAINT**

**PARTIES TO THE ACTION**

1. Plaintiff, Sheri L. Jacquemin, is the sister of David H. Sellers, deceased. Ms. Jacquemin resides at 1175 Sawmill Hill Road, Torrington, CT 06790.

2. Plaintiffs, Samuel E. Sellers and Linda S. Sellers are the parents of David H. Sellers. Mr. and Mrs. Sellers reside at 1175 Sawmill Hill Road, Torrington, CT 06790.

3. Defendant, John M. Yelcick, M.D. a/k/a John Gasser (hereinafter "Yelcick"), is an adult individual who was, at all times relevant hereto, a licensed physician under the laws of the Commonwealth of Pennsylvania. He resides at 8320 Meadowsweet Road, Baltimore, MD 21208.

4. Defendant, Robert J. Gasser, is an adult individual, who purportedly married John M. Yelcick, M.D. a/k/a John Gasser on October 29, 2014. He resides at 209 Echoglen Road, Harrisburg, PA 17109.

5. Defendant, 4 Crazy Guys, LLC, is a limited liability company registered in the state of Maryland with its principal address at 2022 North Charles Street, Baltimore, MD 21218 and its Registered Agent listed as James Pezzulla, Pezzulla and Pezzulla, LLC, Suite 1207, 28 Allegheny Avenue, Towson, MD 21204.

**STATEMENT OF THE FACTS**

6. On the evening of September 13, 2013 David H. Sellers (hereinafter "Decedent"), along with Michael Alessandrini (hereinafter "Alessandrini"), were

social guests of Defendant John M. Yelcick, (hereinafter "Yelcick"), at Yelcick's residence at 635 Willow Green, in the Township of Manheim, Lancaster County, PA.

7. Yelcick met Decedent online on a social networking website frequented by homosexual men.

8. Alessandrini and Yelcick had previously met at Yelcick's residence to consume methamphetamine and have sexual relations on several occasions prior to September 13, 2013.

9. Prior to September 13, 2013, the last time Alessandrini and Yelcick met at Yelcick's residence was in July 2013 when they took methamphetamine and had sexual relations with two other men.

10. It is believed and therefore averred that prior to September 13, 2013, Yelcick regularly invited men that he met over the internet to his residence to have sexual relations and engage in the practice of "slamming" crystal meth, a/k/a methamphetamine.

11. It is further believed and therefore averred that "slamming" is the practice of dissolving methamphetamine in a solution and injecting it into the bloodstream using a syringe.

12. It is believed and therefore averred that on September 13, 2013, Yelcick prepared syringes containing a liquid solution of methamphetamine for himself, Decedent and Alessandrini.

13. It is further believed and therefore averred that Decedent, Yelcick and Alessandrini injected themselves with the above-referenced solution and, shortly thereafter, began to engage in sexual relations.

14. During the course of the sexual activity, Decedent became incoherent and was observed by Yelcick and Alessandrini in obvious medical distress, emitting gurgling sounds from his throat.

15. After the initial signs of medical distress described above, Yelcick and Alessandrini observed Decedent turn blue.

16. Yelcick undertook medical treatment of Decedent by placing him on the floor and performing chest compressions on him while directing Alessandrini to perform mouth to mouth resuscitation.

17. Shortly after Yelcick undertook medical care of Decedent, Alessandrini repeatedly insisted that Yelcick call 911 so that emergency medical personnel could be dispatched to provide acute medical care to Decedent.

18. Yelcick refused to call 911 and demanded that Alessandrini not call 911 as Yelcick was a doctor. As they performed resuscitation on Decedent, his color would return, but when they would stop, he would begin to turn blue again.

19. As time progressed, Decedent's mouth clamped shut and it became more and more difficult to perform mouth to mouth resuscitation.

20. During the course of performing CPR, Alessandrini suggested intubating Decedent as it would allow another avenue to provide air to his lungs,

but was advised by Yelcick that inserting a tube down Decedent's throat would not work.

21. After approximately 45 minutes of CPR, Yelcick advised Alessandrini to stop performing CPR as Decedent was deceased.

22. After failing to call an ambulance for more than 45 minutes and concluding that Decedent was dead, Yelcick refused to notify law enforcement or medical authorities of Decedent's demise.

23. Yelcick attempted to dress Decedent and dragged his body into Yelcick's garage, placing the corpse in the passenger seat of Decedent's car.

24. Yelcick then drove Decedent's car, with Decedent's body in the passenger seat, to a parking lot off of North George Street, in York, Pennsylvania, and abandoned Decedent's body and vehicle in the parking lot.

25. Decedent's family members, Plaintiffs in the instant action, are all residents of the State of Connecticut and were so at the time Decedent's body was discovered by authorities.

26. Decedent's mother, father and sister became extremely concerned and distraught when they were unable to communicate with him for several days after September 13, 2013 following his disappearance.

27. Decedent's body was found in his vehicle in a state of gross decomposition on September 17, 2013. Initially, when Decedent's body was recovered, police were unable to identify him.

28. The discovery of Decedent's body in his vehicle in York, PA generated a great deal of media coverage.

29. Using cellular telephone records, police were able to trace Decedent's last whereabouts to Yelcick's home.

30. On April 2, 2014, Yelcick pleaded guilty to the misdemeanor count of Abuse of a Corpse before the Honorable Joseph C. Madenspacher in the Lancaster County Court of Common Pleas.

**COUNT I**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
**PLAINTIFFS SAMUEL E. SELLERS, LINDA S. SELLERS AND**  
**SHERI L. JAQUEMIN, INDIVIDUALLY v. JOHN M. YELCICK**

31. Paragraphs 1 through 30 are incorporated herein by reference.

32. Plaintiffs believe and therefore aver that Defendant Yelcick's conduct in failing to notify medical and law enforcement authorities of David H. Sellers' demise, and the subsequent transporting to and abandonment of Decedent's body in a parking lot in York, PA, constituted reckless, extreme and outrageous conduct.

33. Defendant Yelcick intended his behavior and knew or should have known that emotional distress to the Plaintiffs would likely result.

34. Defendant Yelcick's conduct as alleged throughout this complaint was outrageous and exceeded all bounds of decency, is odious and utterly intolerable in a civilized society.

35. Defendant Yelcick's conduct caused emotional distress in Plaintiffs and said emotional distress was and remains severe.



36. As a direct and proximate result of Defendant Yelcick's acts, the Plaintiffs suffered pain and suffering, disability, mental anguish, loss of the capacity for the enjoyment of life, psychological care and treatment, expenses for psychological care and treatment, loss of earnings, and the loss of the ability to earn money in the future. Said losses are either permanent or continuing in nature, and the Plaintiffs will continue to suffer from said losses in the future.

WHEREFORE, Plaintiffs demand judgment against Defendant Yelcick in excess of \$50,000.00 together with costs, interest, punitive damages and attorneys' fees as permitted by law. Moreover, Plaintiff further requests that this Honorable Court retain jurisdiction and enter an award of punitive damages in a manner consistent with the dictates of the laws of the Commonwealth of Pennsylvania.

**COUNT II**  
**FRAUDULENT TRANSFER**  
**PLAINTIFFS SAMUEL E. SELLERS, LINDA S. SELLERS AND**  
**SHERI L. JAQUEMIN, INDIVIDUALLY v. JOHN M. YELCICK,**  
**ROBERT J. GASSER & 4 CRAZY GUYS, LLC**

37. Paragraphs 1 through 36 are incorporated herein by reference.

38. On May 16, 2014, counsel for Plaintiffs advised counsel for Defendant Yelcick of his clients' claims.

39. On May 20, 2014, Plaintiffs initiated suit against Defendant Yelcick by filing a Writ of Summon in the Lancaster County Court of Common Pleas.

40. On June 10, 2014, Defendant Yelcick appeared in the Sheriff's Office of Lancaster County and was served with the Writ of Summons by Lt. James Montanez.

41. Prior to June 10, 2016, Defendant Yelcick was the record owner of the premises known as 635 Willow Green, Lititz, Pennsylvania 17543.

42. On November 11, 2014, Defendant Yelcick conveyed said property to Ricky L. Price and Nancy B. Price, husband and wife, in exchange for \$635,000.

43. Upon information and belief, Defendant Yelcick transferred the proceeds of sale along with other assets into an account or accounts which he held jointly with Robert J. Gasser and/or 4 Crazy Guys, LLC, neither of whom had any interest in the 635 Willow Green property.

44. Upon information and belief, John M. Yelcick entered into a scheme to defraud his creditors, which included Plaintiffs, by transferring money and / or assets from his individual name into joint names with other individuals and / or businesses.

45. One of the individuals he conspired with to accomplish this is Defendant Robert J. Gasser.

46. Upon information and belief, in furtherance of their efforts to defraud Plaintiffs and render Defendant Yelcick insolvent, Yelcick and Gasser were married on October 29, 2014.

47. Upon information and belief, Yelcick and Gasser have further attempted to protect Yelcick's assets from collection by Plaintiffs by engaging in a real estate investment venture in Baltimore, MD.

48. Upon information and belief, the venture is known as the Baltimore Eagle – a bar and restaurant catering to individuals interested in the “leather” and “fetish” lifestyles.

49. Defendant Yelcick's transfers have rendered him insolvent, which Defendants Gasser and 4 Crazy Guys, LLC knew or had reason to know.

50. The transfers of Defendant Yelcick's assets to Defendants Gasser and 4 Crazy Guys, LLC was made with actual intent to hinder, delay, and defraud Plaintiffs as well as other potential creditors of Defendant Yelcick.

WHEREFORE, Plaintiffs pray:

- (a) that Defendants be enjoined from transferring or in any way encumbering the assets originally transferred by Defendant Yelcick;
- (b) that the transfer of the assets from Defendant Yelcick to Defendants Gasser and 4 Crazy Guys, LLC be avoided as a fraud against Plaintiffs and other creditors of Defendant Yelcick;
- (c) that Plaintiffs be permitted to levy on and execute against all property which was transferred by Defendant Yelcick to Defendant Gasser, 4 Crazy Guys, LLC or any other person in attempt to avoid payment of damages to Plaintiffs; and
- (d) such other general relief as may be just and proper.

**DEMAND FOR JURY TRIAL**

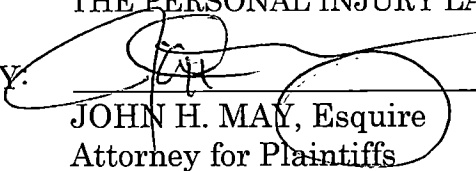
Plaintiffs demand a trial by jury on all issues presented herein.

Respectfully submitted,

THE PERSONAL INJURY LAW GROUP, LLC

Dated: May 24, 2016

BY: \_\_\_\_\_

  
JOHN H. MAY, Esquire  
Attorney for Plaintiffs  
Atty. I.D. # 85341

**VERIFICATION**

I, Samuel E. Sellers, state that I am a Plaintiff in the foregoing matter and hereby verify that the facts contained in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I make this statement subject to the penalties of 18 Pa. R.C.P. § 4904 relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
SAMUEL E. SELLERS

Dated: 5/10/16

**VERIFICATION**

I, Linda S. Sellers, state that I am a Plaintiff in the foregoing matter and hereby verify that the facts contained in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I make this statement subject to the penalties of 18 Pa. R.C.P. § 4904 relating to unsworn falsification to authorities.

  
LINDA S. SELLERS

Dated: 5/10/16

**VERIFICATION**

I, SHERI L. JACQUEMIN, state that I am a Plaintiff in the foregoing matter and hereby verify that the facts contained in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I make this statement subject to the penalties of 18 Pa. R.C.P. § 4904 relating to unsworn falsification to authorities.

  
SHERI L. JACQUEMIN

Dated: 5/10/16

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this 24th day of May, 2016, served the foregoing *Complaint* upon the persons and in the manner indicated below.

First Class Mail, postage prepaid:

Joseph P. Green, Jr., Esq.  
Attorney for Defendant John M. Yelcick, M.D. a/k/a John Gasser  
138 West Gay Street  
West Chester, PA 19380

THE PERSONAL INJURY LAW GROUP, LLC

DATE: May 24, 2016

BY: 

JOHN H. MAY  
Attorney for Plaintiff  
I.D. No. 85341  
49 North Duke Street  
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