



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

Via Electronic Mail and Hand Delivery

January 6, 2014

Terry Mutchler
Office of Open Records
400 North Street, 4th Floor
Harrisburg, PA 17120-0255

Re: *Bagwell v. Pennsylvania Department of Education and Pennsylvania State University*
Docket No. AP 2013-1753

Dear Ms. Mutchler:

Enclosed please find an original of the Pennsylvania Department of Education's Petition for Reconsideration for filing in the above-referenced case.

Please do not hesitate to contact me if you have any questions with regard to this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'K. Feuchtenberger'.

Karen S. Feuchtenberger
Senior Assistant Counsel

cc: Ryan Bagwell (via e-mail)
J. Chadwick Schnee (via e-mail)
Katherine Allen (via e-mail)

(Attached as Exhibit 1).

2. On July 26, 2013, PDE's Open Records Officer advised Mr. Bagwell that PDE required up to an additional 30 days, i.e., until August 26, 2013, in which to respond to his request. (Attached as Exhibit 2).

3. By letter dated August 22, 2013, counsel from the Governor's Office of General Counsel confirmed an agreement with Mr. Bagwell that PDE would provide some responsive public records to Mr. Bagwell by August 26, 2013, and that Mr. Bagwell would grant PDE an extension until September 9, 2013 to perform legal review on the remaining records. (Attached as Exhibit 3).

4. By letter dated August 26, 2013, PDE's counsel provided Mr. Bagwell with copies of responsive public records that had been reviewed as of that date. (Attached as Exhibit 4).

5. By letter dated September 9, 2013, PDE's Open Records Officer granted Mr. Bagwell's request in part, and denied it in part. Mr. Bagwell was provided with responsive public records but was denied other records that PDE believed to be protected from disclosure pursuant to various exemptions in the RTKL. (Attached as Exhibit 5).

6. Included with the September 9, 2013 letter, PDE provided Mr. Bagwell with a list of records that had not been provided and the exemptions that supported the denial.

7. On September 19, 2013, Mr. Bagwell appealed PDE's partial denial to the Office of Open Records (OOR) and that appeal was docketed as #AP 2013-1753.

8. Pursuant to a September 23, 2013 Interim Order of OOR's appeals officer, PDE provided an *in camera* index of the withheld records and bate-stamped copies of the records that were not provided to Mr. Bagwell for *in camera* review.

9. On September 30, 2013, the Pennsylvania State University (PSU) requested the right to participate in Mr. Bagwell's appeal and the request was granted by OOR's appeals officer on October 1, 2013.

10. Written arguments were submitted by the parties in support of their positions regarding whether or not the withheld records were protected from disclosure under the RTKL.

11. On December 20, 2013, OOR's appeals officer issued a Final Determination partially granting and partially denying Mr. Bagwell's appeal.

12. In his Final Determination, OOR's appeals officer held that:

- a. Some records, or portions of records, were protected by the attorney-client privilege and/or the attorney work product doctrine;
- b. The RTKL exemption for internal, predecisional deliberations (65 P.S. § 67.708(b)(10)(i)(A)) did not apply to any of the records at issue in this appeal because PSU is not an agency as defined by the RTKL;
- c. The RTKL exemption for noncriminal investigative records (65 P.S. § 67.708(b)(17)) did not apply to any of the records at issue in this appeal because section 708(b)(17) of the RTKL only applies to records relating to investigations conducted by entities that are agencies under the RTKL.

ERRORS ASSERTED

13. PDE asserts that OOR erred in its ruling that the RTKL exemptions for noncriminal investigative records and internal, predecisional deliberations do not apply to any records at issue in this case.

14. Under the RTKL, a record of an agency relating to a noncriminal investigation is exempt from disclosure. 65 P.S. § 67.708(b)(17). The noncriminal investigation exemption does not apply only to agency investigations. Section 708(b)(17) states that "[a] **record of an agency** relating to a noncriminal investigation, **including . . .**" is exempt from disclosure. There are then six (6) subparagraphs describing examples, without limitation, of what types of records pertaining to a noncriminal investigation are exempt from disclosure. The first five (5) examples

of noncriminal investigations do not have any language limiting the described records to only records pertaining to an investigation conducted by the agency. For example, subparagraph (ii) exempts investigative materials, notes, correspondence and reports; but, it does not limit those records to only those “of an agency investigation.” The only part of section 708(b)(17) that reasonably can be interpreted as limiting the exemption to only investigations conducted by an agency is subparagraph (vi). This is the only subparagraph that uses the language “of an agency investigation” when describing the records that would be exempt from disclosure. Thus, subparagraph (vi) is just one example of what constitutes a noncriminal investigation. The RTKL does not require that the investigation be conducted by a Commonwealth agency. *See, A.R. Building Company v. Pennsylvania Housing Finance Agency*, 500 A.2d 943 (Pa. Cmwlth. 1985) (finding that a private applicant’s market survey submitted to an agency was an investigation of market conditions and not subject to another citizen’s scrutiny).

15. Notwithstanding the unquestionable need for transparency of government operations which is the backbone of the RTKL, the strong policy considerations supporting protections from disclosure of noncriminal investigations conducted by regulated or licensed entities and individuals that are not “agencies” under the RTKL continues to be embodied in Section 708(b)(17) as well as various other laws in the Commonwealth. *See, e.g., 40 P.S. § 1303.311* (providing for confidentiality of health care providers’ patient safety reviews). These self-examinations and investigations can serve as effective alternatives to duplicative investigations conducted by government agencies, which result in additional burden to the agencies and, ultimately, taxpayers. Individuals and entities would be discouraged from engaging in these self-examinations and investigations, and reporting the results to appropriate individuals and agencies, if the records of the investigations would be open to public inspection.

16. In this case, it is public knowledge that PSU's Board of Trustees hired the Freeh Group to be counsel to a Special Investigations Task Force (Task Force) and to conduct an investigation and that Mr. Tomalis was the co-chairman of the Task Force. The Commonwealth Court in *Bagwell v. Pennsylvania Department of Education*, 76 A.3d 81 (Pa. Cmwlth. 2013), noted that PDE regulation of PSU was to protect students and citizens of the Commonwealth; thus, there was a nexus between the Board, Board counsel and Mr. Tomalis when he was a member of the Board. This nexus between Mr. Tomalis, the Board and Board counsel allows PDE to protect records pertaining to the investigation from disclosure under the RTKL. Therefore, any records Mr. Tomalis received regarding the investigation conducted by the Freeh Group are protected from disclosure even though the investigation was not conducted by PDE. The OOR erred in holding that the RTKL exemption for investigative records does not apply to any records at issue in this case.

17. Records that reflect internal, predecisional deliberations of an agency, its members, employees or officials, or predecisional deliberations between agency members and members, employees or officials of another agency are exempt from disclosure under the RTKL. 67 P.S. § 67.708 (b)(10)(i)(A). This includes predecisional deliberations relating to contemplated or proposed policy or course of action and documents used in the predecisional deliberations. The predecisional deliberations exception consists of distinct parts. Exempt from disclosure are records that reflect:

- (1) The internal, predecisional deliberations of an agency;
- (2) **The internal, predecisional deliberations of an agency's members, employees or officials;** or
- (3) The predecisional deliberations between agency members, employees or officials and members, employees or officials of another agency.

18. PDE submits that it is incorrect to hold that the predecisional deliberations exemption only applies to communications that are internal to a Commonwealth agency.

Records that reflect the internal, predecisional deliberations of an agency's official are exempt from disclosure, as well as documents used in the predecisional deliberations. As a member of the Board, Mr. Tomalis received communications, reports and/or memoranda to be reviewed in his capacity as a Board member for purposes of contemplating or proposing policy or courses of action by the Board. These are records that Mr. Tomalis used for his own internal, predecisional deliberations relating to contemplated or proposed policy or course of action. Thus, the withheld records are records used by Mr. Tomalis in his predecisional deliberations and/or are communications between Tomalis and other Board members that reflect internal predecisional deliberations. Therefore, the withheld records are exempt from disclosure under the RTKL and are not public records. The OOR erred in holding that the RTKL exemption for internal, predecisional deliberations does not apply to any records at issue in this case.

WHEREFORE, Petitioner, Pennsylvania Department of Education, respectfully requests the Office of Open Records to reconsider its December 20, 2013, Final Determination granting Mr. Bagwell's appeal as it pertains to the RTKL exemptions of noncriminal investigative records and internal, predecisional deliberations.

Respectfully submitted,



Karen S. Feuchtenberger
Senior Assistant Counsel
Attorney I.D. No. 58995
Pennsylvania Department of Education
333 Market Street, 9th Floor
Harrisburg, PA 17126-0333
Phone: 717-787-5500
Fax: 717-783-0347
e-mail: kfeuchtenb@pa.gov

Date filed: January 6, 2014

EXHIBIT 1

RTK# 2013-117
Due 7/26/13

5219 Shorecrest Drive
Middleton, WI 53562

Michael Bressi
Agency Open Records Officer
Pennsylvania Department of Education
333 Market St., 15th Floor
Harrisburg, PA 17126-0333

Sent via e-mail to e-mail: RA-RTK-Education@pa.gov

July 19, 2013

Dear Mr. Bressi:

This is a request for public records pursuant to the Pennsylvania Right-to-Know Law (the "RTKL"), 65 P.S. §67.101 *et seq.*

I hereby request copies of all letters, memos, reports, contracts and e-mails sent to former secretary of education Ron Tomalis and/or Jane Shoop between Nov. 5, 2011 and July 31, 2012 from any and all of the following individuals:

Louis Freeh	(freeh@freehgroup.com)
Omar McNeill	(mcneill@freehgroup.com)
Kenneth Frazier	(ken_frazier@merck.com)
Annette DeRose	(annette_derose@merck.com)
Paula Ammerman	(pra4@psu.edu)
Karen Peetz	
Steve Garban	

I believe that your office will forthrightly provide the requested records in a manner that is consistent with the purpose of the RTKL. However, to demonstrate that your office has acted in good faith, and to reduce the possibility of an appeal, please provide a so-called "Vaughn Index" or other similar document in the event your office determines any requested records are exempt from disclosure.

I look forward to hearing from your office as soon as possible, but in any event within five business days as required by statute. Additionally, I ask that you correspond with me by e-mail or

telephone instead of U.S. Postal Service mail.

Please don't hesitate to contact me with any questions. Thank you for your time.

Sincerely,

/s/

Ryan Bagwell
608-466-6195
ryan@ryanbagwell.com

EXHIBIT 2



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
333 MARKET STREET
HARRISBURG, PA 17126-0333
www.education.state.pa.us

July 26, 2013

Mr. Ryan Bagwell
5219 Shorecrest Drive
Middleton, WI 53562

Re: Right-to-Know Law Request No. 2013-117

Dear Mr. Bagwell,

Thank you for writing to the Pennsylvania Department of Education (PDE) with your request for information pursuant to the Pennsylvania Right-To-Know Law (RTKL), 65 P.S. §§ 67.101, *et seq.* Your request was received on July 19, 2013, and you requested:

Copies of all letters, memos, reports, contracts and emails sent to former Secretary of Education Ron Tomalis and/or Jane Shoop between Nov. 5, 2011 and July 31, 2012 from any of the following individual:

Louis Freeh	(freeh@freehgroup.com)
Omar McNeill	(mcneill@freehgroup.com)
Kenneth Frazier	(ken_frazier@merck.com)
Annette DeRose	(annette_derose@merck.com)
Paula Ammerman	(pra4@psu.edu)
Karen Peetz	
Steve Garban	

This is an interim response, not a final response, to your request. Under the provisions of 65 P.S. §67.902(b)(2), you are hereby notified that your request is being reviewed for the reasons listed below and this agency will require up to an additional 30 days, i.e., until August 26, 2013, in which to respond to your request.

- A legal review is necessary to determine whether the record is a record subject to access under the RTKL.
- The extent or nature of the request precludes a response within the required time period.

Should you have questions regarding this letter, please contact me by telephone, facsimile, or mail.

Sincerely,

A handwritten signature in black ink, starting with a large, stylized 'M' and ending with a long horizontal stroke.

Michael E. Bressi
Agency Open Records Officer
(717) 783-9795
(717) 772-2317 (fax)

EXHIBIT 3



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

August 22, 2013

SENT VIA EMAIL AND
REGULAR MAIL
ryan@ryanbagwell.com

Mr. Ryan Bagwell
5219 Shorecrest Drive
Middleton, WI 53562

Re: Right-to-Know Law Request No. 2013-117

Dear Mr. Bagwell:

Thank you for writing to the Pennsylvania Department of Education (PDE) with your request for information pursuant to the Pennsylvania Right-To-Know Law (RTKL), 65 P.S. §§ 67.101, *et seq.* Your request was received on July 19, 2013, and you requested:

Copies of all letters, memos, reports, contracts and emails sent to former Secretary of Education, Ron Tomalis, and/or Jane Shoop between Nov. 5, 2011, and July 31, 2012, from any of the following individuals:

Louis Freeh	(freeh@freehgroup.com)
Omar McNeill	(mcneill@freehgroup.com)
Kenneth Frazier	(ken_frazier@merck.com)
Annette DeRose	(annette_derose@merck.com)
Paula Ammerman	(pra4@psu.edu)
Karen Peetz	
Steve Garban	

By letter dated July 26, 2013, you were advised that PDE required up to an additional 30 days, until August 26, 2013, to respond to your request. Per your conversation today with Delene Lantz-Johnson of the Office of General Counsel (Office), you have agreed to an additional extension until Monday, September 9, 2013, for the Office to perform legal review on the remaining part of your original request.

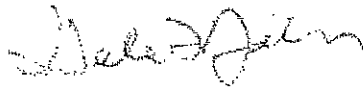
Mr. Ryan Bagwell

Page 2

August 22, 2013

In addition, per your conversation with the Office, the Department will provide the responsive documents that have been reviewed, up to this point, to you on August 26, 2013. Please contact Delene Lantz-Johnson at 717-783-6563 if you have any questions regarding this agreement.

Sincerely,

A handwritten signature in dark ink, appearing to read "Delene Lantz-Johnson", written in a cursive style.

Delene Lantz-Johnson
Deputy General Counsel
717-783-6563

EXHIBIT 4



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

August 26, 2013

Via Electronic Mail (ryan@ryanbagwell.com)

Mr. Ryan Bagwell
5219 Shorecrest Drive
Middleton, WI 53562

Re: Right-to-Know Law Request No. 2013-117

Dear Mr. Bagwell,

Thank you for writing to the Pennsylvania Department of Education (PDE) with your request for information pursuant to the Pennsylvania Right-To-Know Law (RTKL), 65 P.S. §§ 67.101, *et seq.* Your request was received on July 19, 2013, and you requested:

Copies of all letters, memos, reports, contracts and emails sent to former Secretary of Education Ron Tomalis and/or Jane Shoop between Nov. 5, 2011 and July 31, 2012 from any of the following individual:

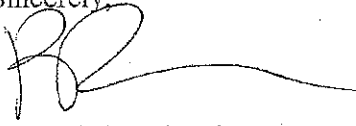
Louis Freeh	(freeh@freehgroup.com)
Omar McNeill	(mcneill@freehgroup.com)
Kenneth Frazier	(ken_frazier@merck.com)
Annette DeRose	(annette_derose@merck.com)
Paula Ammerman	(pra4@psu.edu)
Karen Peetz	
Steve Garban	

By letter dated July 26, 2013, you were advised that PDE requested up to an additional 30 days, until August 26, 2013, to respond to your request. Pursuant to your conversation with Delene Lantz-Johnson of the Office of General Counsel (Office), you agreed to an additional extension until Monday, September 9, 2013, for the Office to perform legal review on the remaining part of your request.

In addition, per your conversation with the Office, it was agreed that PDE would provide the responsive documents that have been reviewed, up to this point, to you on August 26, 2013. In compliance with that agreement and attached to this email, PDE is providing you with the responsive documents that have been reviewed up to this point.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to be 'KSF', with a long horizontal flourish extending to the right.

Karen S. Feuchtenberger
Senior Assistant Counsel

cc: Delene Lantz-Johnson

EXHIBIT 5

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
333 MARKET STREET
HARRISBURG, PA 17126-0333
www.education.state.pa.us

September 9, 2013

Mr. Ryan Bagwell
5219 Shorecrest Drive
Middleton, WI 53562

Re: Right-to-Know Law Request No. 2013-117

Dear Mr. Bagwell,

Thank you for writing to the Pennsylvania Department of Education (PDE) with your request for information pursuant to the Pennsylvania Right-To-Know Law (RTKL), 65 P.S. §§ 67.101, *et seq.* Your request was received on July 19, 2013, and you requested:

Copies of all letters, memos, reports, contracts and emails sent to former Secretary of Education Ron Tomalis and/or Jane Shoop between Nov. 5, 2011 and July 31, 2012 from any of the following individual:

Louis Freeh	(freeh@freehgroup.com)
Omar McNeill	(mcneill@freehgroup.com)
Kenneth Frazier	(ken_frazier@merck.com)
Annette DeRose	(annette_derose@merck.com)
Paula Ammerman	(pra4@psu.edu)
Karen Peetz	
Steve Garban	

By letter dated July 26, 2013, PDE advised that it would require up to an additional 30 days, i.e., until August 26, 2013, in which to respond to your request. On August 26, 2013, pursuant to your agreement with Delene Lantz-Johnson of the Office of General Counsel, PDE provided you with copies of the records responsive to your request that had been reviewed up to that point. In addition, you agreed to grant PDE an additional extension, until September 9, 2013, to perform a legal review of the remaining records and to provide you a response regarding those records.

For the reasons stated below, your request for the remaining records is granted, in part, and denied, in part. Public records responsive to your request are enclosed. However, information that is protected from disclosure under the RTKL has been redacted from the documents. This redacted information consists of personal or cell phone numbers, access codes, and personal email addresses. 65 P.S. § 67.708(b)(6) and (b)(1)(ii).

For the remaining records, your request is denied. A document is enclosed that provides you a list of the specific records that are not being provided to you and the RTKL exemption that ~~protects~~ protects them from disclosure.

The RTKL defines a "public record" as a record that: (1) is not exempt under section 708; (2) is not exempt from being disclosed under any other Federal or State law or regulation or judicial order or decree; or (3) is not protected by a privilege. 65 P.S. § 67.102. In addition, "privilege" is defined in the RTKL to include the attorney-client privilege and the attorney-work product doctrine. 65 P.S. § 67.102. Since the remaining documents that are responsive to your request are, as explained below, either exempt under section 708 or subject to a privilege, they are not public records.

Under the RTKL, a record relating to a non-criminal investigation is exempt from disclosure. 65 P.S. § 67.708(b)(17). This exemption includes investigative materials, notes, correspondence, reports, and a record that if disclosed, would reveal the institution, progress or result of an agency investigation. In this case, however, it is public knowledge that the Board of Trustees of the Pennsylvania State University (Board) hired the Freeh Group to be counsel to the Special Investigations Task Force and to conduct an investigation and that Mr. Ronald Tomalis (Tomalis) was the co-chairman of the Special Investigations Task Force. Therefore, any letters, memos, reports, contracts and emails received by Tomalis from any of the individuals you identified in your request that pertain to the investigation conducted by the Freeh Group are exempt from disclosure under the RTKL; thus, they are not public records.

The definition of privilege under the RTKL includes the attorney-client privilege and the attorney-work product doctrine. "The attorney-client privilege provides that: In a civil matter counsel shall not be competent or permitted to testify to confidential communications made to him by his client, nor shall the client be compelled to disclose the same, unless in either case this privilege is waived upon the trial by the client." 42 Pa.C.S. § 5928. In addition, the Pennsylvania Supreme Court has stated that the attorney-client privilege covers both confidential client to attorney communications and confidential attorney to client communications made for the purpose of obtaining or providing legal advice. *See Gillard v. AIG Insurance Co.*, 15 A.3d 44, 59 (Pa. 2011).

Since the Freeh Group was retained as counsel to the Special Investigations Task Force, any letters, memos, reports, contracts and emails received by Tomalis regarding legal advice provided by the Freeh Group are protected from disclosure based on the attorney-client privilege. Thus, documents received by Tomalis from any of the individuals you identified in your request that seek or contain legal advice from the Freeh Group are protected by the attorney-client privilege. As such, those documents are exempt from disclosure under the RTKL, and therefore, do not constitute public records.

Also, the Board engaged the law firm of Reed Smith as special counsel to advise the Board with respect to various matters arising out of allegations by the Attorney General of the Commonwealth of Pennsylvania regarding misconduct by senior administration officials and a former employee. Any letters, memos, reports, contracts and emails received by Tomalis regarding legal advice provided by the law firm of Reed Smith are protected from disclosure based on the attorney-client privilege. Thus, documents sent to Tomalis from any of the individuals you identified that seek or contain legal advice from the law firm of Reed Smith are

protected by the attorney-client privilege. Such documents are exempt from disclosure under the RTKL, and therefore, do not constitute public records.

In addition, the attorney-work product doctrine protects the "mental impressions, conclusions or opinions respecting the value or merit of a claim or defense or respecting strategy or tactics, including those of a party's representative who is not the party's attorney" from disclosure. *Lavalle v. OGC*, 769 A.2d 449 (Pa. 2001), citing to Pa.R.C.P. 4003.3. The Commonwealth Court has ruled that records reflecting attorney-work product are not public records under the RTKL. *Maleski v. Corporate Life Ins. Co.*, 641 A.2d 1, 5 (Pa. Cmwlth. 2007) (finding that DOC Records Manual was not a public record because it was attorney-work product containing the mental impressions of DOC attorneys). Any documents sent to Tomalis that reflect the mental impressions, conclusions or opinions of the Freeh Group or the law firm of Reed Smith respecting the value or merit of a claim or defense or respecting strategy or tactics and legal advice and litigation are protected by the attorney-work product doctrine. Thus, any documents sent to Tomalis from any of the individuals identified by Mr. Bagwell that reflect the mental impressions, conclusions or opinions of the Freeh Group or the law firm of Reed Smith are exempt from disclosure under the RTKL, and therefore, do not constitute public records.

Records that reflect internal, predecisional deliberations of agency members, employees or officials, or predecisional deliberations between agency members and members, employees or officials of another agency are exempt from disclosure under the RTKL. 67 P.S. § 67.708 (b)(10)(i)(A). This includes predecisional deliberations relating to contemplated or proposed policy or course of action and documents used in the predecisional deliberations. As a member of the Board, Tomalis received letters, memos, reports, contracts and emails to be reviewed in his capacity as a Board member for purposes of contemplating or proposing policy or courses of action by the Board. Therefore, such documents reflect internal predecisional deliberations, including predecisional deliberations relating to contemplated or proposed policy or course of action, or are documents used in the predecisional deliberations. Such documents are exempt from disclosure under the RTKL, and therefore, do not constitute public records.

Pursuant to the fee provisions established by the Office of Open Records, the cost of fulfilling your request is \$ 24.04 (\$.25 per page for duplication for 74 pages and \$5.54 for postage). Kindly remit payment in that amount to Larry McComsey, Pennsylvania Department of Education, 333 Market Street, 15th Floor, Harrisburg, PA 17126, with a check made payable to the Commonwealth of Pennsylvania by September 30, 2013. Further, please note that failure to pay for records provided in response to a RTKL request to any executive agency will preclude you from obtaining further records from this or any other executive agency, pursuant to the provisions of section 901 of the RTKL and Section IV (D) of our agency RTKL Policy, as published on our website

http://www.portal.state.pa.us/portal/server.pt/community/about_pde/7203/p/1122526.

You have a right to appeal this denial of information and/or the fees charged in writing to Terry Mutchler, Executive Director, Office of Open Records (OOR), Commonwealth Keystone Building, 400 North Street, 4th Floor, Harrisburg, Pennsylvania 17120. If you choose to file an appeal you must do so within 15 business days of the mailing date of this response and send to the OOR:

- 1) this response;
- 2) your request;
- 3) the reasons why you think the fee charged is not permissible under the RTKL; and
- 4) the reason why you think the agency is wrong in its reasons for saying that the record is not public (a statement that addresses any ground stated by the agency for the denial, which you are challenging). If the agency gave several reasons why the record is not public, state which ones you think were wrong.

Also, the OOR has an appeal form available on the OOR website at:
<https://www.dced.state.pa.us/public/oor/appealformgeneral.pdf>.

Should you have questions regarding this letter, please contact me by telephone, facsimile, or mail.

Sincerely,



Larry McComsey
Agency Open Records Officer
(717) 787-5380
(717) 772-2317 (fax)

Date filed: January 6, 2014