



FINAL DETERMINATION

IN THE MATTER OF

**JIM MOLLICK,
Requester**

v.

**WORCESTER TOWNSHIP,
Respondent**

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Docket No: AP 2026-3275

FACTUAL BACKGROUND

On June 16, 2026, Jim Mollick (“Requester”) submitted a request (“Request”) to Worcester Township (“Township”) pursuant to the Right-to-Know Law (“RTKL”), 65 P.S. §§ 67.101 *et seq.*, seeking:

1. All records of communication to and/or from the Township, Township staff, Solicitor, Manager and/or Board collectively and/or individually regarding the Palmer property for the past 5 years.
2. All records of communication to and/or from the Township, Township staff, Solicitor, Manager and/or Board collectively and/or individually regarding the Palmer property litigation for the past 5 years.
3. All records of communication to and/or from the Township, Township staff, Solicitor, Manager and/or Board collectively and/or individually and the litigants in the P[al]mer Case[,], which includes[,], but is not limited to[,], the Palmers, Ed Mullen and/or his firm, Wini Hayes, Rob Hayes, Marc Jonas and/or his firm regarding the Palmer property and the Palmer property litigation for the past 5 years.

4. All records of communication to and/or from the Township, Township staff, Solicitor, Manager and/or Board collectively and/or individually regarding a settlement, settlement offer(s), settlement agreement(s), settlement talks and/or settlement discussions regarding the Palmer property and/or litigation for the past 5 years.

5. All records of communication to and/or from the Township, Township staff, Solicitor, Manager and/or Board collectively and/or individually regarding the Board authorizing the Solicitor to proceed with litigation in the Court of Common Pleas[] involving the Palmer property for the past 5 years.

6. All records of communication to and/or from the Township, Township staff, Solicitor, Manager and/or Board collectively and/or individually regarding the Board authorizing the Solicitor to proceed with litigation in the Commonwealth Court involving the Palmer property for the past 5 years.

[7.] All [RTKL requests] filed with the Township and the Township's responses to those requests from [January 1, 2025] to present. This includes[,] but is not limited to[,] extension requests and final responses. I do not want the records provided in response to the requests.

[8.] All records and/or record of communication to and/or from the Township, Manager, Staff, Solicitor, Board collectively and/or individually, and/or consultants that defines and/or provides criteria for what a "voluminous RTK request" is.

On July 20, 2026, following a thirty-day extension during which to respond, 65 P.S. § 67.902(b), the Township partially granted the Request and provided records responsive to Items 1, 2, 3, 5 and 7. The Township withheld records responsive to Items 1, 2, 3 and 4, that the Township asserts are protected by the attorney-client privilege and attorney work product doctrine, 65 P.S. §§ 67.102 (definition of privilege), 67.305(a)(2), 67.506(c)(2). Additionally, the Township asserts that a settlement agreement responsive to Item 4, as well as records responsive to Item 6¹ and 8, do not exist in the Township's possession, custody or control.

On August 10, 2026, the Requester filed an appeal with the Office of Open Records ("OOR"), challenging the denial and stating grounds for disclosure. Specifically, the Requester

¹ Specifically, the Township indicates that records responsive to Item 6 were provided in response to Item 5, and as such, additional records responsive to Item 6 do not exist.

asserts additional records responsive to Items 5, 6, 7 and 8 of the Request exist. Additionally, the Requester argues that the Township should release privileged records in redacted format and be required to provide a privilege log to support the withholding of responsive records.² Further, the Requester seeks *in camera* review of all withheld records. Lastly, the Requester asserts the Township failed to indicate which records are responsive to each Item of the Request³ and acted in bad faith by “manipulating” the records since the Requester cannot “search” the records provided. The OOR invited both parties to supplement the record and directed the Township to notify the OOR if any third parties have a direct interest in this appeal. 65 P.S. § 67.1101(c).

On August 24, 2026, the Township submitted correspondence, seeking consolidation of the instant appeal with other RTKL appeals filed by the Requester. Said request was denied by the OOR on August 25, 2026.

On August 24, 2026, the Requester submitted copies of the responsive records provided by the Township.⁴

On August 27, 2026, the Township submitted a position statement,⁵ reiterating its grounds for partial denial of the Request. In support of its position, the Township submitted two

² The Requester also argues the Township did not “provide any credible factual or legal support for denying access to responsive records[.]”; however, the Township is not required to provide evidence of a good faith search or in support of its partial denial at the response stage of the RTKL process. *See* 65 P.S. §§ 67.901, 903; *see also Levin v. Pa. Dep’t of Educ.*, OOR Dkt. AP 2023-2588, 2025 PA O.O.R.D. LEXIS 1017, *19 (explaining that “[t]he language in Section 903 does not include a requirement that the agency link a basis for denial with a specific record”).

³ The RTKL does not require an agency to organize the records in any manner when responding to a request. A response and notice of extension are the two appropriate agency actions when facing a request under the RTKL. First, Section 901 of the RTKL states that “[u]pon receipt of a written request for access to a record, an agency shall make a good faith effort to determine if the record requested is a public record...and whether the agency has possession, custody or control of the identified record, and to respond as promptly as possible...” 65 P.S. § 67.901. Second, Section 902 of the RTKL provides that an agency may invoke an extension of time to respond to a RTKL request when certain factors are present. 65 P.S. § 67.902(b). Thus, the RTKL does not require the Township to outline the records that are responsive to each Item of the Request.

⁴ Due to the volume of the disclosed records, copies of all of the responsive records were not uploaded to the appeal docket. A portion of the responsive records contained redacted information. As those redactions have not been challenged by the Requester, those redactions will not be addressed in this Final Determination.

⁵ The contents of the Township’s position statement are verified to be true and correct. *See* DeMeno Attestation ¶ 23.

attestations, made subject to the penalties of unsworn falsification to authorities, 18 Pa.C.S. § 4904, authored by Daniel DeMeno (“DeMeno Attestation”), the Township’s Manager and Agency Open Records Officer (“AORO”), and Devin Ralph, Esq. (“Ralph Attestation”), the Township’s Solicitor.

On August 14, 2026, the Requester submitted a rebuttal position statement,⁶ arguing, among other things, that “[t]he affidavits submitted by the Township are conclusory and cannot be used to withhold the requested records,” that “no claimant of a testimonial privilege can be the final arbiter of his own claim” and the Township failed to access responsive records maintained by GovPilot⁷ in response to the Request.⁸

LEGAL ANALYSIS

The Township is a local agency subject to the RTKL. 65 P.S. § 67.302. Records in the possession of a local agency are presumed to be public, unless exempt under the RTKL or other law or protected by a privilege, judicial order or decree. *See* 65 P.S. § 67.305. As an agency subject to the RTKL, the Township is required to demonstrate, “by a preponderance of the evidence,” that records are exempt from public access. 65 P.S. § 67.708(a)(1). Preponderance of the evidence has been defined as “such proof as leads the fact-finder ... to find that the existence of a contested fact is more probable than its nonexistence.” *Pa. State Troopers Ass’n v. Scolforo*,

⁶ The Requester notes that his unredacted personal information was provided to a Township resident and, as a result, the Requester seeks information concerning the Township resident and an explanation from the Township regarding this particular resident. This is outside the scope of the instant RTKL appeal, and as such, this issue will not be further addressed herein.

⁷ The Requester requests that the Township be required to provide evidence confirming the date the Township implemented GovPilot. The OOR has repeatedly held that a requester may not modify, explain or expand a request on appeal. *See Pa. State Police v. Office of Open Records*, 995 A.2d 515, 516 (Pa. Commw. Ct. 2010); *Michak v. Dep’t of Pub. Welfare*, 56 A.3d 925 (Pa. Commw. Ct. 2012) (holding that “where a requestor requests a specific type of record ... the requestor may not, on appeal argue that an agency must instead disclose a different record in response to the request”).

⁸ The OOR granted evidentiary submission extensions in this appeal through August 28, 2026. *See* 65 P.S. § 67.1102(b)(3) (stating that “the appeals officer shall rule on procedural matters on the basis of justice, fairness, and the expeditious resolution of the dispute”).

18 A.3d 435, 439 (Pa. Commw. Ct. 2011) (quoting *Pa. Dep't of Transp. v. Agric. Lands Condemnation Approval Bd.*, 5 A.3d 821, 827 (Pa. Commw. Ct. 2010)). Likewise, “[t]he burden of proving a record does not exist ... is placed on the agency responding to the right-to-know request.” *Hodges v. Pa. Dep't of Health*, 29 A.3d 1190, 1192 (Pa. Commw. Ct. 2011).

While the Requester sought an *in camera* review of the withheld records, the OOR has sufficient information and evidence before it to adjudicate the matter. Therefore, the request for *in camera* review is denied.

1. The Township demonstrated that the withheld responsive records are privileged

The RTKL excludes records subject to a privilege from the definition of “public record.” See 65 P.S. § 67.102. The RTKL defines “privilege” as “[t]he attorney-work-product doctrine, the attorney-client privilege, the doctor-patient privilege, the speech and debate privilege or other privilege recognized by a court interpreting the laws of this Commonwealth.” *Id.* The attorney-client privilege protects only those disclosures necessary to obtain informed legal advice, where the disclosure might not have occurred absent the privilege, and where the client’s goal is to obtain legal advice. *Joe v. Prison Health Services, Inc.*, 782 A.2d 24 (Pa. Commw. Ct. 2001). In order for the attorney-client privilege to apply, an agency must demonstrate that: 1) the asserted holder of the privilege is or sought to become a client; 2) the person to whom the communication was made is a member of the bar of a court, or his subordinate; 3) the communication relates to a fact of which the attorney was informed by his client, without the presence of strangers, for the purpose of securing either an opinion of law, legal services or assistance in a legal matter, and not for the purpose of committing a crime or tort; and 4) the privilege has been claimed and is not waived by the client. See *Bousamra v. Excelsa Health*, 210 A.3d 967, 976 (Pa. 2019). “[A]fter an agency establishes the privilege was properly invoked under the first three prongs, the party challenging

invocation of the privilege must prove waiver under the fourth prong.” *Office of the Governor v. Davis*, 122 A.3d 1185, 1192 (Pa. Commw. Ct. 2014) (citing *id.*).

The attorney-work product doctrine, on the other hand, prohibits disclosure “of the mental impressions of a party’s attorney or his or her conclusions, opinions, memoranda, notes or summaries, legal research or legal theories.” Pa.R.C.P. 4003.3. “The purpose of the work product doctrine is to protect the mental impressions and processes of an attorney acting on behalf of a client, regardless of whether the work product was prepared in anticipation of litigation.” *Bousamra*, 210 A.3d 976 (internal citations omitted); *see also Heavens v. Pa. Dep’t of Env’tl. Prot.*, 65 A.3d 1069, 1077 (Pa. Commw. Ct. 2013) (“[U]nder the RTKL the work-product doctrine protects a record from the presumption that the record is accessible by the public if an agency sets forth facts demonstrating that the privilege has been properly invoked”). While the attorney-client privilege is waived by voluntary disclosure, *Bousamra*, 210 A.3d at 978 (internal citation omitted), the work-product doctrine is not primarily concerned with confidentiality, as it is designed to provide protection against adversarial parties. *Id.* at 979 (internal citations and quotation omitted).

The Township asserts that the records withheld encompass communications between legal counsel and Township staff and either seek legal services or provide legal opinions and, therefore, the responsive records are protected by the attorney-client privilege and the attorney-work product doctrine.

The DeMeno Attestation indicates, in relevant part, the following:

7. I sought and/or was provided legal advice from the Township Solicitor in relation to the Palmer property and the litigation associated with that property, and I assert attorney-client privilege over the specific email communications that otherwise would have been responsive to the Request.

8. I received emails from the Township Solicitor that are subject to the attorney work product doctrine and I assert the attorney work product privilege over such emails that otherwise would have been responsive to the Request.

9. I confirm that all persons who sent and received emails for which I assert attorney client privilege are attorneys for the Township, including the Township Solicitor, members of the staff of that law firm, members of Township staff, the Board of Supervisors, the Township Engineer, the Township Traffic Engineer and the expert planning witness engaged by the Township.

In further support of the Township's position, the Ralph Attestation provides:

7. The withheld records contain legal advice, hearing preparation, litigation strategy, and confidential information protected by Rule 1.6 (a) of the Pennsylvania Rules of Professional Conduct in relation to certain property known as the Palmer property, where the owners of that property filed a substantive validity challenge with the Zoning Hearing Board.

8. As the Township Solicitor, my office was authorized to intervene in those proceedings.

9. After being unsuccessful before the Zoning Hearing Board, the owners appealed to the Montgomery County Court of Common Pleas, *Palmer, et al vs. Worcester Township Zoning Hearing Board*, Docket No. 2025-03490.

10. A further appeal was taken to the Commonwealth Court, where it is currently pending.

11. As an attorney, I understand that factual material is not subject to attorney client privilege and confirm that, in my professional legal opinion, the attorney client privilege applies to the withheld records.

12. I confirm that all recipients and senders of legally privileged emails are attorneys for the Township, including the Township Solicitor and Zoning Hearing Board Solicitor, members of the staff of those law firms, Township employees and members of the Board of Supervisors, and the statutorily appointed Township Engineer.

Under the RTKL, an affidavit or statement made under penalty of perjury may serve as sufficient evidentiary support. *See Sherry v. Radnor Twp. Sch. Dist.*, 20 A.3d 515, 520-21 (Pa. Commw. Ct. 2011); *Moore v. Off. of Open Records*, 992 A.2d 907, 909 (Pa. Commw. Ct. 2010). In the absence of any evidence that the Township has acted in bad faith, "the averments in the [attestations] should be accepted as true." *McGowan v. Pa. Dep't of Env'tl. Prot.*, 103 A.3d 374,

382-83 (Pa. Commw. Ct. 2014) (citing *Off. of the Governor v. Scolforo*, 65 A.3d 1095, 1103 (Pa. Commw. Ct. 2013)).

Based upon the review of the descriptions contained in the attestations, the Township has demonstrated that the withheld records are protected by the attorney-client privilege and/or the attorney-work product doctrine. The records consist of communications between the Township and its solicitors, containing or seeking legal advice related to litigation, hearing preparation and litigation strategy. The withheld records either seek legal advice or contain opinions or mental impressions of an attorney. Furthermore, the Township affirms that the withheld records have not been shared beyond the Township, no privileges have been waived and the Requester has not proven waiver of attorney-client privilege. As such, the responsive records were properly withheld under the attorney-client privilege and/or the attorney-work product doctrine and the records are not subject to public access. *See Pa. Health and Wellness, Inc. v. Pa. Dep't of Human Resources*, OOR Dkt. AP 2020-1398, 2021 PA O.O.R.D. LEXIS 644; *see also Shannon v. Pa. Dep't of General Services*, OOR Dkt. AP 2021-1375, 2021 PA O.O.R.D. LEXIS 1765.⁹

2. The Township demonstrated that additional responsive records do not exist in its possession, custody or control

The Township asserts that other than the records provided to the Requester and the records withheld, no further responsive records exist in the Township's possession, custody or control. In response to a request for records, "an agency shall make a good faith effort to determine if ... the agency has possession, custody or control of the record[.]" 65 P.S. § 67.901. While the RTKL

⁹ While the Requester asserts the responsive records should be released in redacted format, "where a record falls within an exemption under Section 708(b), it is not a public record as defined by the RTKL and an agency is not required to redact the record...." *Pa. State Police v. Office of Open Records*, 5 A.3d 473, 481 (Pa. Commw. Ct. 2010). As the responsive records are not subject to access, the Township does not need to provide the records to the Requester in redacted format.

does not define the term “good faith effort,” in *Uniontown Newspapers, Inc. v. Pa. Dep’t of Corr.*, the Commonwealth Court stated:

As part of a good faith search, the open records officer has a duty to advise all custodians of potentially responsive records about the request, and to obtain all potentially responsive records from those in possession... When records are not in an agency’s physical possession, an open records officer has a duty to contact agents within its control, including third-party contractors ... After obtaining potentially responsive records, an agency has the duty to review the records and assess their public nature under ... the RTKL.

185 A.3d 1161, 1171-72 (Pa. Commw. Ct. 2018) (citations omitted), *aff’d*, 243 A.3d 19 (Pa. 2020).

An agency must show, through detailed evidence submitted in good faith from individuals with knowledge of the agency’s records, that it has conducted a search reasonably calculated to uncover all relevant documents. *See Burr v. Pa. Dep’t of Health*, OOR Dkt. AP 2021-0747, 2021 PA O.O.R.D. LEXIS 750; *see also Mollick v. Twp. of Worcester*, 32 A.3d 859, 875 (Pa. Commw. Ct. 2011).

Under Section 705 of the RTKL, when responding to a request, “an agency shall not be required to create a record which does not currently exist or to compile, maintain, format or organize a record in a manner in which the agency does not currently compile, maintain, format or organize the record.” 65 P.S. § 67.705; *see also Moore v. Office of Open Records*, 992 A.2d 907, 909 (Pa. Commw. Ct. 2010) (holding that an agency cannot be made to create a record that does not exist). However, providing information from an agency database does not constitute the creation of a record. *See Commonwealth v. Cole*, 52 A.3d 541, 549 (Pa. Commw. Ct. 2012) (“[D]rawing information from a database does not constitute creating a record under the Right-to Know Law”); *see also Gingrich v. Pa. Game Comm’n*, No. 1254 C.D. 2011, 2012 Pa. Commw. Unpub. LEXIS 38, *21 (Pa. Commw. Ct. 2012) (“[P]ulling information from a database is not the

creation of a record”). “To hold otherwise would encourage an agency to avoid disclosing public records by putting information into electronic databases.” *Cole*, 52 A.3d at 549.

Here, the Request seeks records related to a specified property, litigation related to the specified property and RTKL requests. The Requester asserts that additional records exist and that the Township failed to obtain responsive records in accordance with Section 506(d)(1) of the RTKL. In support of the Township’s argument that it does not possess additional responsive records, the DeMeno Attestation indicates, in relevant part, as follows:

4. I advised all custodians of potentially responsive records of the Request and to search for potentially responsive records and provide all potentially responsive records to me for review.

5. From June 16, 2026 to July 20, 2026, I conducted a good faith search of records that may be responsive to the Request, detailed as followed:

- a. I searched the Township email addresses of the members of the Board of Supervisors;
- b. I searched my Township email address;
- c. I attempted to search for the emails of prior Township managers;
- d. I searched the physical and electronic files in the Township building.

...

11. In relation to [Item 7] of the Request, I confirm that the Township utilizes GovPilot, a program to assist in processing RTK[L] requests.

12. In summary of the GovPilot process, when a requester submits a request to the online portal, I am alerted of the request for processing, then I upload any responsive records to the portal, input whether the request is granted or denied, and a response is sent by the program to the requester. The records of all requests and responses are maintained on the program portal; however, I do not receive a copy of the response.

13. As a show of good faith, I was able to generate a summary of all RTK[L] requests from January 2025 to the date of the Request on GovPilot, and provided that summary as responsive to the Request.

14. Utilizing the GovPilot portal, I am unable to obtain copies of all RTK[L] requests, extension letters and responses without copying and pasting the

information into a new document. To date, I have not undertaken this task as it would require the creation of a new record, which is not required under the RTKL.

15. I confirm that following a good faith search, I was unable to identify any responsive records in relation to Item 4 regarding a settlement agreement, Item 6 and Item [8] of the Request, as detailed in the Response.

16. In relation to Item 5 of the Request regarding authorization to proceed with litigation in the Court of Common Pleas, the responsive record that was provided was the minutes of the meeting of the Board of Supervisors of December 15, 2021.

17. In relation to Item 6 of the Request regarding authorization to proceed with litigation in the Commonwealth Court, I confirm that there are no further records other than the record provided for Item 5.

The Township's attestation is authored by its AORO, who has direct knowledge of the Township's records. The Township has demonstrated that a good faith search of the Township's records was performed, which included a search within the Township's electronic RTKL file management system, on-site physical files and emails. DeMeno Attestation ¶¶ 4-5. Additionally, the Township searched its RTKL management software and determined that other than the summary of RTKL requests provided, the Township was unable to provide further responsive records without the copying and pasting of information and creating documents in response to Item 7 of the Request. DeMeno Attestation ¶¶ 11-14.

The Requester asserts that additional records exist and the Township is required to "contact" its "contractor," GovPilot, to obtain responsive records; however, the OOR does not agree. GovPilot is a management software utilized by local agencies, not a "contractor."¹⁰ Thus, Section 506(d)(1) is not at issue in the present appeal and, as such, a further analysis of Section 506(d)(1) of the RTKL is not necessary. *See* 65 P.S. § 506(d)(1).¹¹ While the Requester does not

¹⁰ See <https://www.govpilot.com/> (last accessed by the OOR on September 2, 2026).

¹¹ Even if a contract existed between the Township and GovPilot, GovPilot is not performing a governmental function as contemplated by the Supreme Court in *SWB Yankees, LLC v. Wintermantel*, 45 A.3d 1029 (Pa. 2012). As noted by the Supreme Court in *SWB Yankees*, a governmental function must include "delegation of some substantial facet of

argue that the Township is required to create a new document in response to the Request, the OOR notes that based upon the evidence provided by the Township, the Township is unable to simply provide the requested records and instead, generated a spreadsheet providing the responsive information permitted by the GovPilot software. *See* Requester appeal pp. 39-72; *see also* DeMeno Attestation ¶¶ 12-14.

Thus, based on the evidence provided, the Township has demonstrated that it does not possess additional responsive records. There has been no sufficient evidence provided by the Requester that otherwise contradicts the statements offered by the Township in the attestation submitted. *See Pa. Dep't of Health v. Mahon*, 283 A.3d 929 (Pa. Commw. Ct. 2022). Therefore, based on the evidence provided, the Township has met its burden of proof that additional records responsive to the Request do not exist in the Township's possession, custody or control.¹² *Hodges*, 29 A.3d at 1192.

3. The OOR declines to make a finding of bad faith

The Requester argues that the Township has acted in bad faith by “alter[ing] [the emails] from their original form/format” and password protecting the same emails. As a result, the Requester is unable to search through the emails via Microsoft Outlook tools.¹³ In response to this assertion, the Township notes that the responsive records were not altered or manipulated and that no actions were taken to hinder searching the records. DeMeno Attestation ¶ 18. Additionally, the Township indicates the records are not password protected because to do so would prevent the

the agency's role and responsibilities, as opposed to entry into routine service agreements with independent contractors.” *Id.* at 1043.

¹² The OOR makes no determination as to whether records *should* exist, as our inquiry is limited to only whether or not records are “in existence and in possession of the ... agency at the time of the right-to-know request.” *Moore*, 992 A.2d at 909; *see also* 65 P.S. § 67.705.

¹³ Of note, the Requester has not provided any evidentiary basis for the assertion that emails provided in response to a request must be in a format that allows a requester to “search” those same emails via an Microsoft Outlook tool.

Requester from opening the records. DeMeno Attestation ¶ 19.

While the OOR may make findings of bad faith, only the courts have the authority to impose sanctions on agencies. *See generally* 65 P.S. § 67.1304(a). Under the RTKL, a finding of bad faith is appropriate where an agency refuses to comply with its statutory duties under the RTKL. *Uniontown Newspapers*, 243 A.3d at 28-29; *California Univ. of Pa. v. Bradshaw*, 210 A.3d 1134 (Pa. Commw. Unpub. 2021), *appeal denied*, 2019 PA LEXIS (Pa. 2019); *Office of the Dist. Atty. of Phila. v. Bagwell*, 155 A.3d 1119 (Pa. Commw. Ct. 2017).

In the instant matter, the OOR declines to make a finding of bad faith. The Township responded to the Request, provided electronic records in an electronic medium in accordance with Section 701 of the RTKL¹⁴ and has participated on appeal. As such, the OOR has no reason to make such a finding.

CONCLUSION

For the foregoing reasons, the appeal is **denied**, and the Township is not required to take any further action. This Final Determination is binding on all parties. Within thirty days of the mailing date of this Final Determination, any party may appeal to the Montgomery County Court of Common Pleas. 65 P.S. § 67.1302(a). All parties must be served with notice of the appeal. The OOR also shall be served notice and have an opportunity to respond as per Section 1303 of the RTKL; however, as the quasi-judicial tribunal adjudicating this matter, the OOR is not a proper party to any appeal and should not be named as a party.¹⁵ 65 P.S. § 67.1303. All documents or communications following the issuance of this Final Determination shall be sent to [oor-](#)

¹⁴ See 65 P.S. § 67.701.

¹⁵ *Padgett v. Pa. State Police*, 73 A.3d 644, 648 n.5 (Pa. Commw. Ct. 2013).

postfd@pa.gov. This Final Determination shall be placed on the OOR website at:
<http://openrecords.pa.gov>.

FINAL DETERMINATION ISSUED AND MAILED: September 10, 2026

/s/ Bandy L. Jarosz

BANDY L. JAROSZ, ESQ.
APPEALS OFFICER

Sent to: Jim Mollick (via portal only)
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