



FINAL DETERMINATION

IN THE MATTER OF	:	
	:	
MARK SEIBERLING	:	
AND KLEINBARD LLC,	:	
Requester	:	
	:	
v.	:	Docket No.: AP 2026-2989
	:	
PHILADELPHIA SCHOOL DISTRICT,	:	
Respondent	:	

On June 1, 2026, Mark Seiberling, Esq. and Kleinbard LLC (collectively “Requester”) submitted a request (“Request”) to the Philadelphia School District (“District”) pursuant to the Right-to-Know Law (“RTKL”), 65 P.S. §§ 67.101 *et seq.*, seeking:

From July 1, 2023 to the present:

1. Records, reports, memoranda, summaries, analyses, evaluations, recommendations, findings, scorecards, rubrics, notes, and assessments relating to the...District’s review, evaluation, or consideration of [Philadelphia Montessori Charter School’s (“PMCS”)] charter renewal or nonrenewal.
2. Records concerning any recommendation to renew, conditionally renew, deny renewal, or not renew PMCS’s charter.
3. Communications, including emails, text messages, instant messages, memoranda, correspondence, and attachments, between or among...District personnel, administrators, Board members, Charter Schools Office personnel, consultants, and/or outside advisors concerning PMCS and its proposed renewal or nonrenewal.

4. Communications between the...District and any third party relating to PMCS's charter renewal or nonrenewal, including communications with the Pennsylvania Department of Education, consultants, advocacy groups, Board members, elected officials, or any other individuals or entities.
5. Records identifying the criteria, standards, metrics, policies, procedures, guidelines, or factors used in evaluating PMCS for renewal or nonrenewal.
6. Drafts and final versions of reports, recommendations, presentations, PowerPoints, Board materials, briefing materials, and agenda materials concerning PMCS's renewal or nonrenewal.
7. Notes, meeting minutes, handwritten notes, calendars, meeting invitations, meeting summaries, and recordings relating to meetings where PMCS's charter renewal or nonrenewal was discussed.
8. Records reflecting concerns, deficiencies, findings, or alleged performance issues identified by the...District regarding PMCS.
9. Records comparing PMCS to other charter schools under review for renewal or nonrenewal during the same period.
10. Records supporting, referencing, or relied upon in any recommendation or determination regarding PMCS's proposed renewal or nonrenewal.
11. Records reflecting communications with members of the Board of Education concerning PMCS's renewal status or potential nonrenewal.
12. Records of directives, instructions, or guidance issued to...District employees concerning review of PMCS or preparation of materials relating to PMCS's renewal or nonrenewal.

On July 8, 2026, following a thirty-day extension during which to respond, 65 P.S. § 67.902(b), the District partially¹ denied the Request, arguing that the Request, in part, is insufficiently specific, 65 P.S. § 67.703, that certain responsive records are exempt noncriminal investigative records, 65 P.S. § 67.708(b)(17) and that the District does not possess records responsive to Item 9 of the Request.

¹ The District provided records responsive to Items 5,8 and 12 of the Request.

On July 22, 2026, the Requester appealed to the Office of Open Records (“OOR”), challenging the partial denial² and stating grounds for disclosure.³ The OOR invited both parties to supplement the record and directed the District to notify the OOR if any third parties have a direct interest in the appeal. 65 P.S. § 67.1101(c).

On August 4, 2026, the District submitted a position statement reiterating its grounds for the partial denial. In support of its position, the District provided the attestations of its Assistant General Counsel, Kristina Helmers, Esq. (“Helmerts Attestation”), and of its Chief of Charter Schools, Peng Chao (“Chao Attestation”). Both attestations address the District’s specificity argument concerning Items 1-4, 7, and 10-11 of the Request. Additionally, the Chao Attestation explains the District’s charter renewal process and addresses the records withheld as related to noncriminal investigations.

On that same day, the Requester submitted a position statement in support of the appeal and sought *in camera* review of the withheld records.

LEGAL ANALYSIS

The District 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 District 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*, 18 A.3d 435,

² The Requester confirmed that the appeal does not challenge the District’s denial of Item 9 of the Request.

³ During the appeal the Requester granted the OOR an extension of time to issue a final determination. *See* 65 P.S. § 67.1101(b)(1) (“Unless the requester agrees otherwise, the appeals officer shall make a final determination which shall be mailed to the requester and the agency within 30 days of receipt of the appeal filed under subsection (a).”)

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

1. Items 2, 4, 10 and 11 are insufficiently specific and Items 1, 3, and 7 of the Request are sufficiently specific in part

The District argues that Items 1-4, 7, and 10-11 of the Request are insufficiently specific in whole or in part. *See* 65 P.S. § 67.703. The Requester argues that the District “erroneously narrowed the scope of” Items 1, 2, 3, 7, 10, and 11 of the Request.

Section 703 of the RTKL states that “[a] written request should identify or describe the records sought with sufficient specificity to enable the agency to ascertain which records are being requested.” 65 P.S. § 67.703. When determining whether a particular request is sufficiently specific, the OOR uses the three-part balancing test employed by the Commonwealth Court in *Pa. Dep't of Educ. v. Pittsburgh Post-Gazette*, 119 A.3d 1121 (Pa. Commw. Ct. 2015).

First, “[t]he subject matter of the request must identify the ‘transaction or activity’ of the agency for which the record is sought.” *Id.* at 1125 (quoting 65 P.S. § 67.102). Second, “[t]he scope of the request must identify ‘a discrete group of documents, either by type...or by recipient.’” *Id.* (quoting *Carey v. Pa. Dep't of Corr.*, 61 A.3d 367, 372 (Pa. Commw. Ct. 2013)). Finally, “[t]he timeframe of the request should identify a finite period of time for which records are sought.” *Id.* at 1126 (citing *Carey, supra*). “The timeframe prong is, however, the most fluid of the three prongs, and whether or not the request’s timeframe is narrow enough is generally dependent upon the specificity of the request’s subject matter and scope.” *Id.*

The above factors are intended “to facilitate an analysis in order to determine whether an agency can ascertain which records are being requested.... The subject matter, scope, and

timeframe of a request are flexible, analytical elements, not evidentiary requirements.” *Pa. Dep’t of Health v. Shepherd*, No. 377 C.D. 2021, 2022 Pa. Commw. Unpub. LEXIS 207 *6-7 (Pa. Commw. Ct. 2022), appeal denied, No. 334 MAL 2022, 2022 Pa. LEXIS 1862 (Pa. 2022). Finally, we must analyze the entirety of a request, as it is possible that portions of a request are insufficiently specific, while other portions provide sufficient guidance. *See Pa. State Police v. Office of Open Records*, 995 A.2d 515, 517 (Pa. Commw. Ct. 2010) (noting “the valid part of the request was included in a laundry list of requested materials”).

Here, each Item of the Request has the same lengthy but finite timeframe of “July 1, 2023 to the present” or, approximately, three years. *See Pa. Dep’t of Educ.*, 119 A.3d 1121. A lengthy timeframe is not fatal to a request’s specificity if its subject matter and scope provide the agency with enough information to search for responsive records. *Id.*

a. Item 1 of the Request is sufficiently specific in part

Item 1 of the Request has a subject matter, the “District’s review, evaluation, or consideration of PMCS’s charter renewal or nonrenewal[.]” and a broad scope that identifies types of records, specifically, “[r]ecords, reports, memoranda, summaries, analyses, evaluations, recommendations, findings, scorecards, rubrics, notes, and assessments.” *See Pa. Dep’t of Educ.*, *supra*.

The District argues that the subject matter of Item 1 of the Request is “overbroad because they fail to identify discrete [District] transactions or activities[.]” The District also argues that because the Request seeks records “relating to” PMCS’s charter renewal, the District is forced to

make judgments as to what records are, in fact, responsive to Item 1.⁴ Finally, the District argues that Item 1 of the Request does not seek a clearly defined universe of documents.

In *Greim v. Pennsylvania State Police*, 329 A.3d 873 (Pa. Commw. Ct. 2025), the Commonwealth Court recently reiterated that “[a] request need only provide enough information to inform ‘an agency of the records requested.’” *Id.* at 882 (quoting *Montgomery Cnty. v. Iverson*, 50 A.3d 281, 284 n.4). While the use of the phrase “relating to[,]” broadens the scope of Item 1 of the Request, the subject matter of the Request, as a whole, is the renewal (or non renewal) of PMCS’s charter. Moreover, unlike in *In re Mazin*, where the request failed to identify any particular type of record, Item 1 of the instant Request lists several specific types of documents that the District can search for such as “reports, memoranda, ...scorecards, rubrics, [and] notes.” No. 1126 C.D. 2022, 2025 Pa. Commw. Unpub. LEXIS 190, *10-11 (explaining that although the request specified a subject matter that was well-known to the agency, it failed to identify any particular type of record and included expansive language seeking all correspondence “relating to” the already general terms it laid out).⁵

Therefore, Item 1 of the Request provides, in part, sufficient information for the District to determine a potential universe of responsive records and who would be the likely custodians. *See* 65 P.S. § 67.703; *see also* *Pa. Dep’t of Educ.*, 119 A.3d at 1125; *Greim*, 329 A.3d at 882. As such, Item 1 of the Request is sufficiently specific insofar as it seeks “reports, memoranda, ...scorecards, rubrics, [and] notes.”

b. Item 2 of the Request is insufficiently specific

⁴ *Pa. Dep’t of Env’t Prot. v. Legere*, 50 A.3d 160, 165 (Pa. Commw. Ct. 2012) (finding that a request that would require an agency to review all potentially responsive files and “make judgments as to the relation of the documents to the specific request” would be insufficiently specific).

⁵ An unpublished opinion of the Commonwealth Court may be cited for its persuasive value. 210 Pa. Code § 69.414.

Item 2 of the Request has a subject matter, the renewal or nonrenewal of PMCS's charter, and has a broader scope, "records[.]" The District makes the same arguments, contending that the subject matter of Item 2 is overbroad and Item 2 does not seek a clearly defined universe of documents. Unlike Item 1, Item 2 does not list specific types of documents that the District can search for. Without more guidance, the District is unable to narrow the universe of potentially responsive records located without making judgments as to which records are, in fact, responsive. Accordingly, Item 2 of the Request is insufficiently specific. *See* 65 P.S. § 67.703; *Pa. Dep't of Educ., supra*; *In re Mazin, supra*. However, nothing in this Final Determination precludes the Requester from filing a new, more specific request, and if necessary, filing an appeal pursuant to the requirements of 65 P.S. § 67.1101(a)(1).

c. Item 3 of the Request is sufficiently specific in part

Item 3 of the Request has the same subject matter, the renewal or nonrenewal of PMCS's charter, and also uses the same broadening language of "related to." Thus, the District makes the same argument that its subject matter is overbroad and requires judgments to be made. The scope of Item 3 of the Request provides several distinct types of communications sought, "emails, text messages, instant messages, memoranda, ...and attachments," and also identifies the senders and recipients of the communications, "between or among...District personnel, administrators, Board members, Charter Schools Office personnel, consultants, and/or outside advisors." Although, "District personnel, [generally,]...consultants, and/or outside advisors" do little to aid the District, the other senders and recipients are specific enough to help the District search for records responsive to the Request. As such Item 3 of the Request is sufficiently specific as it pertains to "emails, text messages, instant messages, memoranda, ...and attachments[.]...between or among...District...administrators, Board members, Charter Schools Office personnel...."

d. Item 4 of the Request is insufficiently specific

Item 4 of the Request has the same subject matter, the renewal or nonrenewal of PMCS's charter, and also uses the same broadening language of "related to." The scope of Item 4 is broad, communications, without listing any specific types of communications. The scope of Item 4 does attempt to provide senders and recipients of the communications, the "District and any third party, ...including...the Pennsylvania Department of Education, consultants, advocacy groups, Board members, elected officials, or any other individuals or entities." However, this list does little, if anything, to narrow the scope of Item 4. Therefore, Item 4 of the Request is insufficiently specific.

e. Item 7 of the Request is sufficiently specific in part

Item 7 of the Request has a subject matter, meetings "related to" the renewal or nonrenewal of PMCS's charter. Additionally, Item 7 of the Request has a somewhat narrow scope, identifying types of documents sought, such as meeting minutes and notes. The District makes the same arguments, contending that the subject matter of Item 2 is overbroad and the use of the phrase "related to" requires the District to make judgments. The OOR agrees, in part. The Cho Attestation states that, for PCMS, the District conducted three annual evaluations during the Request's timeframe. *See* Chao Attestation, ¶ 7.⁶ As such, Item 7 is specific insofar as it seeks the identified records for meetings that occurred as a part of the District's evaluations of PCMS's charter as described in the Chao Attestation. However, Item 7 is insufficiently specific as to other meetings such as the hypothetical situations described in the Helmers Attestation. *See* Helmers Attestation, ¶ 7(e).

⁶ Under the RTKL, a sworn affidavit or statement made under the 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. Office of Open Records*, 992 A.2d 907, 909 (Pa. Commw. Ct. 2010); *McGowan v. Pa. Dep't of Env'tl. Prot.*, 103 A.3d 374, 382-83 (Pa. Commw. Ct. 2014) (citing *Office of the Governor v. Scolforo*, 65 A.3d 1095, 1103 (Pa. Commw. Ct. 2013)).

f. Item 10 of the Request is insufficiently specific

Item 10 of the Request has a subject matter, the renewal or nonrenewal of PMCS's charter, which is significantly broadened by the use of the words, "supporting," and "referencing," as well as use of the phrase "relied upon[.]" The scope of Item 10 if the Request is broad, seeking "records." As such, without any additional information, Item 10 of the Request is insufficiently specific.⁷

g. Item 11 of the Request is insufficiently specific

Item 11 of the Request has a subject matter "PMCS's renewal status or potential nonrenewal[.]" which is broadened by the use of the word "reflecting." Like Item 10, Item 11 has a broad scope, "records," and does not identify any type of records. Item 11 identifies "members of the [District] Board of Education" as the senders or recipients of the "records" but, as written, Item 11 is insufficiently specific because does not provide the District with the information to ascertain what type of records to or from its Board members are sought.

2. The District demonstrated that certain records are exempt as related to noncriminal investigations

The District argues that it properly withheld the records responsive to Item 6 of the Request and that the records requested in Items 1, 3 and 7 are exempt from disclosure as records related to noncriminal investigations it conducted into "whether PMCS was meeting the standards set forth in its charter, the Charter School Performance Framework ("Framework"), and applicable law." *See* 65 P.S. § 67.708(b)(17). The Requester argues that "[c]harter school evaluations for the purpose of renewal or nonrenewal recommendations are not investigations."

⁷ However, nothing in this Final Determination precludes the Requester from filing a new, more specific request, and if necessary, filing an appeal pursuant to the requirements of 65 P.S. § 67.1101(a)(1).

Section 708(b)(17) of the RTKL exempts from disclosure records of an agency “relating to a noncriminal investigation,” including “[c]omplaints submitted to an agency,” “[i]nvestigative materials, notes, correspondence and reports,” and “[a] record that, if disclosed, would ... [r]eveal the institution, progress or result of an agency investigation....” 65 P.S. §§ 67.708(b)(17)(i)-(ii), (vi)(A). For this exemption to apply, an agency must demonstrate that “a systematic or searching inquiry, a detailed examination, or an official probe” was conducted regarding a noncriminal matter. *See Pa. Dep’t of Health v. Office of Open Records*, 4 A.3d 803, 810-11 (Pa. Commw. Ct. 2010). However, the investigation must encompass more than the agency’s routine performance of its duties, and the agency cannot rely merely on broad statements that an investigation occurred to satisfy its burden to prove the applicability of the exemption. *Anand v. Commonwealth*, 329 A.3d 1, 18 (Pa. Commw. Ct. 2024) (citing *Pa. Public Util. Comm’n v. Friedman*, 293 A.3d 803, 828 (Pa. Commw. Ct. 2023)); *see also Pa. Dep’t of Labor & Indus. v. Darlington*, 234 A.3d 865 (Pa. Commw. Ct. 2020). Further, the inquiry, examination, or probe must be “conducted as part of an agency’s official duties.” *Id.* at 814. An official probe only applies to noncriminal investigations conducted by agencies acting within their legislatively granted factfinding and investigative powers. *See Pa. Dep’t of Pub. Welfare v. Chawaga*, 91 A.3d 257 (Pa. Commw. Ct. 2014). To hold otherwise would “craft a gaping exemption under which any governmental information-gathering could be shielded from disclosure.” *Id.* at 259.

Here, the Chao Attestation states that, under Pennsylvania’s Charter School Law (“CSL”), “a charter school may only operate ‘under a charter from the local board of school directors,” and that “[t]he board of school directors may choose ‘to revoke or not renew the charter’ of a charter school pursuant to Section 17–1729–A of the [CSL] in the event that the board of school directors makes a finding that at least one of various criteria has not been met.” *See Chao Attestation*, ¶ 4;

24 P.S. § 17–1703–A, 1729–A.⁸ Additionally, the OOR has held that a school district has the legislative authority to investigate charter school applications and that the examinations of charter renewal applications were included within the authority granted by the CSL. *See Joan Myers Brown Academy, A String Theory Charter Sch. v. Phila. Sch. Dist.*, OOR Dkt. AP 2021 2198, 2022 PA O.O.R.D. LEXIS 374; *see also Seiberling v. Phila. Sch. Dist.*, OOR Dkt. AP 2025-2930, 2026 PA O.O.R.D. LEXIS 52 (*Seiberling I*); *see also Seiberling v. Phila. Sch. Dist.*, OOR Dkt. AP 2026-0086 (*Seiberling II*), 2022 PA O.O.R.D. LEXIS ____.⁹ Therefore, the District has the legislative authority to evaluate charter applications and charter renewals.

In support of the District’s position that it conducted an investigation within the meaning of Section 708(b)(17) into PCMS’s charter renewal, the Chao Attestation explains that the District’s Charter School Office (“CSO”), “annually assesses each charter school authorized by the [District’s] Board” and that the “CSO’s Accountability Team is responsible for conducting the annual evaluation of all existing charter schools, which includes the comprehensive review of all charter schools that have applied for renewal.” *See* Chao Attestation, ¶ 6. The Chao Attestation also explains that the Accountability Team evaluates “whether a particular charter school is meeting the standards set forth in its charter, [in] the Charter School Performance Framework, and [in] applicable law.” *Id.* Additionally, the Chao Attestation clarifies that “when members of the CSO’s Accountability Team evaluate charter schools, they consider a set of standards and apply those standards to the entire charter sector[,]” meaning “individual team members are not assigned to evaluate a specific school, but rather, evaluate all of the schools at the same time.” *Id.*, ¶ 10. For PCMS, the Cho Attestation identifies the annual evaluations that occurred during the Request’s

⁸ The Chao Attestation notes that the Philadelphia Home Rule Charter and District Board Policies 400 and 401 also authorize the District to revoke a charter school’s charter.

⁹ *Seiberling I* and *II* are both pending on appeal with the Philadelphia Court of Common Pleas.

timeframe—“(1) a comprehensive renewal evaluation of PMCS during the 2023-2024 school year, which resulted in a one-year renewal recommendation; (2) an annual evaluation of PMCS during the 2024-2025 school year; and (3) a comprehensive renewal review of PMCS during the 2025-2026 school year, which resulted in a nonrenewal recommendation.” *Id.*, ¶ 7. Moreover, the OOR has previously held that the examinations of charter renewal applications are related to noncriminal investigations under the RTKL. *See Seiberling I*, 2026 PA O.O.R.D. LEXIS 52; *Seiberling II*, 2026 PA O.O.R.D. LEXIS _____. Further, although the Requester argues that the CSL does not require school districts to conduct “formal investigation[s] into existing charters or authorize regular investigations into charter schools for renewal purposes[,]” it does not mean that the District does not conduct investigations as contemplated by Section 708(b)(17) of the RTKL when it evaluates the renewal of a charter school’s charter. Finally, the Requester argues that the District’s evaluation of charter renewals is akin to the routine field inspection of the agency’s boiler in *Darlington* because its “Board implements its own policies, procedures, and evaluative methods as part of its ongoing monitoring of charter schools and the Requested records pertain “to its routine monitoring of existing charter schools, not to an official probe or searching inquiry into compliance with the CSL.” 234 A.3d 865. However, in *Seiberling I*, the OOR found “that the investigation conducted by the...District into charter schools is akin to the regularly conducted investigation of nursing homes conducted by the [Pennsylvania] Department of Health and the inspections of natural gas utility’s operations by the [Pennsylvania Public Utilities Commission] that were found to be noncriminal investigations under the RTKL.” 2026 PA O.O.R.D. LEXIS 52; *Pa. Dep’t of Health*, 4 A.3d at 810-11; *Pa. Public Utilities Commission v. Gilbert*, 40 A.3d 755, 760 (Pa. Commw. Ct. 2012). Thus, based on the evidence presented, the District demonstrated that, in this instance, it conducted “a systematic or searching inquiry, a detailed

examination, or an official probe” into the renewal of PCMS’s charter within the Request’s timeframe. *Id.*

Turning to the records at issue, Item 1 of the Request seeks “reports, memoranda, ...scorecards, rubrics, [and] notes.” Item 3 of the Request seeks “emails, text messages, instant messages, memoranda, ...and attachments[.]...between or among...District personnel, administrators, Board members, Charter Schools Office personnel....” Item 6 seeks “[d]rafts and final versions of reports, recommendations, presentations, PowerPoints, Board materials, briefing materials, and agenda materials[.]” and Item 7 seeks “[n]otes, meeting minutes, handwritten notes, calendars, meeting invitations, meeting summaries, and recordings[.]” The Chao Attestation confirms that the requested records are all “generated, prepared and/or considered during the investigation into whether PMCS is meeting the standards set forth in its charter, [in] the Charter School Performance Framework, and [in] applicable law” and that “the release of the records sought and/or implicated by these items of the Request would also reveal the institution, progress or result of the...District’s noncriminal investigation into whether PMCS is meeting the[se] standards.” *See* Chao Attestation, ¶¶ 9-10. Accordingly, based on the evidence presented and consistent with *Seiberling I* and *Seiberling II*, the requested records are exempt under the noncriminal investigative records exemption of the RTKL. 65 P.S. § 67.708(b)(17)(i)-(ii), (vi)(A).¹⁰

Furthermore, because the District demonstrated that the records are exempt under Section 708(b)(17) of the RTKL, the records do not constitute “public records” that are subject to the redaction provisions in 65 P.S. § 67.706. *See Castillo v. Pa. State Police*, 310 A.3d 831 (Pa.

¹⁰ Since the District demonstrated that the withheld records are exempt from disclosure under 65 P.S. § 67.708(b)(17), the OOR need not address the District’s alternate grounds for denial. *See Jamison v. Norristown Bor. Police Dept.*, OOR Dkt. AP 2011-1233, 2011 PA O.O.R.D. LEXIS 927.

Commw. Ct. 2024) (holding that an agency is not required to redact a record if the record falls within an exemption under Section 708(b)).

CONCLUSION

For the foregoing reasons, the appeal is **denied**, and the District 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 Philadelphia 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 according to court rules as per 65 P.S. § 67.1303, but 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.¹¹ All documents or communications following the issuance of this Final Determination shall be sent to oor-postfd@pa.gov. This Final Determination shall be placed on the OOR website at: <http://openrecords.pa.gov>.

FINAL DETERMINATION ISSUED AND MAILED: September 17, 2026

/s/ Erika Similo

ERIKA SIMILO
APPEALS OFFICER

Sent via portal to: Mark Seiberling, Esq.
Kristina Helmers, Esq.

¹¹ *Padgett v. Pa. State Police*, 73 A.3d 644, 648 n.5 (Pa. Commw. Ct. 2013).