

IN THE COURT OF COMMON PLEAS OF
CENTRE COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA : No(s). CP-14-CR-2421-2011
: CP-14-CR-2422-2011
vs. :
GERALD A. SANDUSKY :

MOTION OF THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS TO QUASH
DEFENDANT'S SUBPOENA, OR IN THE ALTERNATIVE
FOR IN CAMERA INSPECTION AND PROTECTIVE ORDER

FILED FOR RECORD
2012 MAY -8 P 2:41
DEBRA C. MUMFORD
PROthonary
CENTRE COUNTY, PA

AND NOW, comes the Honorable John E. Wetzel, Secretary of Corrections, by and through the Governor's Office of General Counsel, and hereby moves to quash the subpoena issued by Defendant to the Pennsylvania Department of Corrections (hereinafter the "Department" or "DOC"), or in the alternative, for an *in camera* inspection and protective order. In support thereof, the Department avers as follows:

1. Sometime after April 10, 2012, Secretary Wetzel received a cover letter from counsel for the Defendant, enclosing (i) the Notice required by this Honorable Court's March 13, 2012 Order; (ii) a subpoena from counsel for the Defendant to DOC; (iii) a "Subpoena Attachment" requesting production of "[a]ll Department of Corrections records that pertain to" the victims, **whom Defendant's counsel specifically identified by name**; (iv) a listing entitled "Accuser/Alleged Victim Information in which defense counsel again **listed every victim by name and birth date**"; and (v) this Court's March 13, 2012 Order protecting under the seal of the Court the identities of the victims, notwithstanding defense counsel's specific identification of the victims by name and birth date. A true and correct copy of the aforesaid documents are attached hereto as Exhibit "A" and incorporated herein by reference as if set forth in full. The identity of the victims has been redacted from the "Subpoena Attachment" included in Exhibit

“A” and the separate listing of the victims has been removed from Exhibit “A” entirely to ensure strict compliance with this Honorable Court’s March 13, 2012 Order.

2. To ensure that the scope of the subpoena was broad enough to encompass every piece of paper that could conceivably exist in a file maintained by the Department, Defendant’s subpoena additionally requests specific subsets of documents in the hopes that something may exist. (See Exhibit “A”, “Subpoena Attachment”, ¶¶A(1)-(5) & B).

3. Like other third parties who have already lodged objections to similar subpoenas of unbridled breadth also served by Defendant’s counsel, the Department incorporates herein and adopts by reference the averments of the Motion to Preclude Improper Use of Subpoena Power by Defendant previously filed by the Attorney General’s Office.

4. The request by Defendant for DOC to essentially produce any document in its possession that relates to any of the victims in the desperate hope that something beneficial to the Defendant will turn up is precisely the type of “fishing expedition” that courts of this Commonwealth have never approved, spawning the rule of law in Pennsylvania which holds that “[s]ubpoenas are not to be used to compel production of documents merely for inspection or for a fishing expedition.” *Commonwealth v. Cook*, 865 A.2d 869, 877 (Pa. Super. 2004), *appeal denied*, 584 Pa. 672 (Pa. 2005) (quoting *Commonwealth v. McEnany*, 667 A.2d 1143, 1149 (Pa. Super. 1995), *appeal denied*, 545 Pa. 622 (Pa. 1996)).

5. In reviewing the propriety of Defendant’s subpoena issued to DOC, this Honorable Court must assess whether the documents sought to be produced would be relevant and admissible during trial. *Commonwealth v. Schierscher*, 668 A.2d 164, 169-69 (Pa. Super. 1995), *appeal denied*, 547 Pa. 715 (Pa. 1997) (upholding trial court’s quash of subpoena on the basis that the proposed testimony would be irrelevant). Thus, it is incumbent upon the

Defendant as a threshold matter to articulate the relevance of the subpoenaed documents, any such articulation being conspicuously absent from the subpoena issued to DOC.

6. In the absence of a showing of the relevance of any of the requested documents, Defendant's subpoena mirrors the breadth of the inspection deemed impermissible in *Commonwealth v. Blakeny*, 596 Pa. 510 (Pa. 2008), *writ denied*, 555 U.S. 1177 (2009) in which the Pennsylvania Supreme Court opined that a defendant has no right to obtain or review records in the mere hope that he might uncover some collateral information with which to challenge the credibility of a witness. *Id.* at 661.

7. Neither can the Defendant's invocation of his Due Process rights expand the otherwise permissible expanse of a subpoena seeking the production of documents. To the contrary, the Superior Court of Pennsylvania has held that such rights "[do] not mean that a defendant has unfettered access to files not in his possession. Nor can a defendant search untrammelled through Commonwealth files in order to argue the relevance of materials found therein." *Commonwealth v. Herrick*, 660 A.2d 51 (Pa. Super. 1995), *appeal denied*, 543 Pa. 710 (Pa. 1996) (internal citations omitted).

8. Based on the foregoing, DOC respectfully requests that this Honorable Court quash the subpoena issued by Defendant's counsel to the Secretary of Corrections.

DEPARTMENT RECORDS IDENTIFIED IN RESPONSE TO SUBPOENA

9. The averments of paragraphs one (1) through eight (8) are incorporated herein by reference as if set forth in full.

10. Notwithstanding the defectiveness of the subpoena received by DOC as outlined above, a thorough search of the Department's records has revealed documents corresponding to

only one (1) of the individuals identified by name and birth date by Defendant's counsel. There are no other responsive records in the possession of DOC.

11. In addition to the reasons set forth in paragraphs one (1) through eight (8) above, Defendant's subpoena must be quashed because specific records included in the single file in the Department's possession and covered by the scope of the subpoena are confidential and/or privileged pursuant to various authorities as more fully detailed below.

a. **Criminal history records from Clearfield County and PBPP Records, including correspondence with PBPP, Integrated Case Summary DC-13A, Parole Orders:**

The Pennsylvania Criminal History Record Information Act ("CHRIA") specifically prohibits agencies from making secondary disseminations of criminal history record information. 18 Pa. C.S. § 9106 (d). Further, CHRIA provides that "investigative information [and] treatment information, including medical and psychiatric information" maintained by a criminal justice agency shall not be disseminated. 18 Pa. C.S.A. § 9105. State correctional facilities are expressly included in the definition of "criminal justice agency." See 18 Pa. C.S.A. § 9102 (definitions); *McCrery v. Mark*, U.S. Dist. LEXIS 12562 (E.D. Pa. Aug. 18, 1992) (holding that an inmate psychological evaluation and other documents were not discoverable in a civil rights case where those documents were at issue because their dissemination was prohibited under 18 Pa. C.S.A. §§ 9106 and 9121(c)).

In addition, criminal history that constitutes parole summaries and recommendations compiled by DOC for use by the Pennsylvania Board of Probation and Parole (PBPP) are shielded from disclosure pursuant to the law. 37 Pa. Code § 61.2. Accordingly, any such information containing staff evaluations, investigatory, classification, programming, mental health and other diagnostic and evaluative information that pertains to the DOC's assessment

regarding an individual's suitability for parole will not be released. *Id.*; 55 Pa. Code § 5100.33 (parole and probation reports shall be released or access to them given only in accordance with 37 Pa. Code Part II). Release of such information would allow inmates to manipulate the information and manipulate parole assessment results, retaliate against staff for perceived negative evaluations, and otherwise interfere in the parole evaluation process.

b. **DOC CHRIA records including vote sheets, classification records and Inmate Cumulative Adjustment Records:** In addition to the same CHRIA protections referenced above, vote sheets divulge the identity of decision makers and rationale of confidential classification and security decisions related to inmates. Similarly, the Inmate Cumulative Adjustment Records (ICAR) contains corrections counselors' candid notations regarding observation of the inmate, security concerns, risks, parole recommendations and other actions. The dissemination of these records divulges classification and security processes within the prison environment which are not relevant to the instant proceedings. Classification records divulge the processes and means utilized by the DOC to make security and rehabilitative programming determinations. The release and disclosure of such records would severely adversely affect the DOC's ability to reliably make basic and essential classification decisions. Furthermore, the relevance and value of such information when applied to the instant proceedings is of such slight value that the DOC's interest in maintaining the confidentiality of the records should be affirmed. DOC asserts Executive/Deliberative Process privilege over these documents. See *Ario v. Deloitte & Touche LLP*, 934 A.2d 1290 (Pa. Commonwealth, 2007). To the extent that any such information would be required to be disseminated, the records should be subject to only *in camera* inspection and review and an appropriate protective order to maintain confidentiality of the records at issue.

c. **DOC medical records containing confidential information:** Confidential medical information may not be disseminated absent the subject's consent or a court order issued after the court finds that one of the following conditions exists: (1) The person seeking the information has demonstrated a compelling need for that information which cannot be accommodated by other means; or (2) The person seeking to disclose the information has a compelling need to do so. 35 P.S. §§ 7707-7608. Further, confidential medical information is irrelevant to the instant litigation and should not be produced.

d. **Mental health records:** The CHRIA specifically prohibits agencies from making secondary disseminations of criminal history record information. 18 Pa. C.S. § 9106 (d). Further, CHRIA provides that "investigative information [and] treatment information, including medical and psychiatric information" maintained by a criminal justice agency shall not be disseminated. 18 Pa. C.S.A. § 9105. State correctional facilities are expressly included in the definition of "criminal justice agency." See 18 Pa. C.S.A. § 9102 (definitions); *McCrery v. Mark*, U.S. Dist. LEXIS 12562 (E.D. Pa. Aug. 18, 1992) (holding that an inmate psychological evaluation and other documents were not discoverable in a civil rights case where those documents were at issue because their dissemination was prohibited under 18 Pa. C.S.A. §§ 9106 and 9121(c)).

Furthermore, Mental Health records are privileged and not subject to discovery under the Mental Health Procedures Act:

All documents concerning persons in treatment shall be kept confidential and, without the person's written consent, may not be released or their contents disclosed to anyone except:

- (1) those engaged in providing treatment for the person;
- (2) the county administrator, pursuant to section 110;
- (3) a court in the course of legal proceedings authorized by this act; and

(4) pursuant to Federal rules, statutes and regulations governing disclosure of patient information where treatment is undertaken in a Federal agency.

In no event, however, shall privileged communications, whether written or oral, be disclosed to anyone without such written consent. This shall not restrict the collection and analysis of clinical or statistical data by the department, the county administrator or the facility so long as the use and dissemination of such data does not identify individual patients. Nothing herein shall be construed to conflict with section 8 of the act of April 14, 1972 (P.L. 221, No. 63), known as the "Pennsylvania Drug and Alcohol Abuse Control Act."

50 P.S. § 7111.

In *Zane v. Friends Hosp.*, 575 Pa. 236, 250-251 (Pa. 2003), the Pennsylvania Supreme Court held: "The importance of confidentiality cannot be overemphasized. To require the Hospital to disclose mental health records during discovery would not only violate Anderson's statutory guarantee of confidentiality, but would have a chilling effect on mental health treatment in general. The purpose of the Mental Health Procedures Act of seeking "to assure the availability of adequate treatment to persons who are mentally ill," 50 P.S. § 7102, would be severely crippled if a patient's records could be the subject of discovery in a panoply of possible legal proceedings. See also *Pearson v. Miller*, 211 F.3d 57, 61, 72-73 (3d Cir. 2000) (It is settled under Pennsylvania law that the MHPA gives rise to "an absolute confidentiality privilege" covering documents related to the treatment of mental health problems. *Hahnemann Univ. Hosp v. Edgar*, 74 F.3d 456, 465 (3d Cir. 1996); see also *Commonwealth v. Moyer*, 595 A.2d 1177, 1180 (Pa. Super. 1991), *appeal denied*, 529 Pa. 656 (Pa. 1992). That privilege, however, is held by the patient, who is permitted to waive it and to allow the protected information to be released).

It is further noted that pursuant to 55 Pa. Code § 5100.35 DOC has an obligation to inform the court that, under statute and regulations, the records are confidential and cannot be

released without an order of the court. Neither the records officer nor the facility director has any further duty to oppose a subpoena beyond stating to the court that the records are confidential and cannot be released without an order of the court. However, nothing within the Code shall be construed as authorizing such a court order. *Id.*

e. **Medical records:** The CHRIA precludes dissemination of inmate medical records based on the citations included in sub-paragraphs (a) & (d) above. In addition, a DOC inmate has a constitutional right to privacy in his medical records. *Doe v. Delie*, 257 F.3d 309 (3d Cir. 2001). DOC has not received the subject's consent to release his medical records. Furthermore, any purported interest presented by the Defendant suggesting that the medical records are needed for defense of its case are of dubious value and do not outweigh the constitutional protections which justify confidentiality of these medical records. See e.g., *Commonwealth v. Boone*, 429 A.2d 689 (Pa. Super. 1981) (allegedly intolerable prison conditions including inadequate medical care inadmissible to establish defense of justification); *Commonwealth v. Merriwether*, 555 A.2d 906 (Pa. Super. 1989), *appeal denied*, 535 Pa. 617 (Pa. 1993) (defense of justification is not established where notifying authorities was available to address threat); *Commonwealth v. Schwartz*, 615 A.2d 350 (Pa. Super. 1992) (to establish justification defense there must be a clear and imminent harm; one must reasonably expect actions would be ineffective in avoiding greater harm; and no legal alternative would be effective in abating harm).

12. Alternatively, were the defects in the Defendant's subpoena as outlined in paragraphs one (1) through eight (8) above somehow overcome, and were this Court to determine that the privilege of confidentiality asserted in paragraph eleven (11)(a)-(e) is not absolute, thus requiring a balancing of the Department's interest in maintaining the confidentiality of the

subpoenaed DOC records versus the Defendant's right to effectively confront and cross-examine witnesses against him, it is respectfully submitted that only an *in camera* inspection of the protected documents in DOC's possession is appropriate in order to preserve the competing interests of the parties. See *Commonwealth v. Herrick*, 660 A.2d 51, 62 (Pa. Super. 1995), *appeal denied*, 543 Pa. 710 (Pa. 1996). See also Pa.R.Crim.P. 573(F).

WHEREFORE, the Pennsylvania Department of Corrections respectfully requests that this Honorable Court grant its Motion to Quash Defendant's Subpoena. In the alternative, Movant respectfully requests that this Honorable Court conduct an *in camera* hearing and inspection of the Department's responsive records to the subpoena and thereafter grant the Motion to Quash or issue an appropriate protective order where applicable.

Respectfully submitted,

STEPHEN S. AICHELE
General Counsel

Date: May 7, 2012

By:



JARAD W. HANDELMAN
Deputy General Counsel
Attorney I.D. No. 82629

Governor's Office of General Counsel
333 Market Street, 17th Floor
Harrisburg, PA 17120
(717) 772-4262

*Counsel for Third-Party Respondent, Pennsylvania
Department of Corrections*

IN THE COURT OF COMMON PLEAS OF
CENTRE COUNTY, PA

COMMONWEALTH OF PENNSYLVANIA

v.

GERALD SANDUSKY

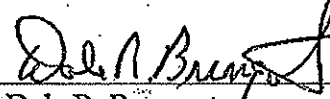
No. CP-14-CR-2421-2011

No. CP-14-CR-2422-2011

VERIFICATION

I, Dale R. Brungart, am a Records Supervisor at the State Correctional Institution at Rockview. I have reviewed the attached Motion to Quash and hereby verify that the answers contained in Paragraph 11, subparagraphs a and b, are true and correct to the best of my knowledge, information and belief. I make this verification subject to the penalties under 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.

Date: 5/7/12



Dale R. Brungart
Records Supervisor
State Correctional Institution at Rockview

EXHIBIT “A”

JOSEPH L. AMENDOLA

ATTORNEY-AT-LAW

110 REGENT COURT

SUITE 202

STATE COLLEGE, PA 16801-7966

TELEPHONE
814-234-6821

FAX
814-234-6013

April 10, 2012

Mr. John E. Wetzel, Secretary
PA Department of Corrections
2520 Lisburn Road
P.O. Box 598
Camp Hill, PA 17001-4859

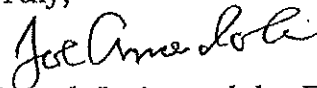
**RE: Commonwealth v. Gerald A. Sandusky
Subpoena with Attachment & Order of the Court**

Dear Mr. Wetzel:

Please find enclosed a subpoena requiring the production of information as provided in the Subpoena Attachment. If this information is provided to me at my above-listed office address on or before May 14, 2012, it will not be necessary for a representative of your Department to appear in court in Centre County, Pennsylvania, on May 16, 2012 at 10:00 a.m. with the requested information.

Thank you for your anticipated prompt attention to this matter. I will await further word from a representative of the Department concerning the request contained in this correspondence.

Truly,



Joseph L. Amendola, Esquire

JLA:dka
Enclosures

NOTICE

**BY ORDER OF THE COURT OF COMMON
PLEAS OF CENTRE COUNTY,
PENNSYLVANIA, DATED MARCH 13, 2012,
ANY PERSON OR AGENCY RECEIVING THIS
SUBPOENA IS NOTIFIED THAT THE NAME
OR ANY IDENTIFYING INFORMATION OF
THE PERSON FOR WHOM THE RECORDS
OR OTHER INFORMATION IS SOUGHT IS
PROTECTED BY THE SEAL OF THE COURT.**

**UNDER POTENTIAL PENALTY OF
CONTEMPT OF COURT, THE PERSON'S
NAME OR IDENTIFYING INFORMATION MAY
NOT BE DISCLOSED TO ANY PERSON
EXCEPT AS REQUIRED TO COMPLY WITH
THIS SUBPOENA.**

Commonwealth of Pennsylvania
COUNTY OF CENTRE

COMMONWEALTH OF PENNSYLVANIA

VS.

GERALD A. SANDUSKY, DEFENDANT

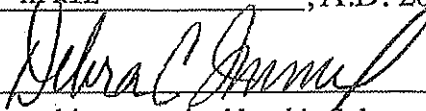
TO MR. JOHN E. WETZEL, SECRETARY, PA DEPARTMENT OF CORRECTIONS, 2520 LISBURN ROAD,
P.O. BOX 598, CAMP HILL, PA 17001-4859

You are ordered by the court to come to CENTRE COUNTY COURTHOUSE, COURTROOM NO. 1,
SECOND FLOOR, 102 SOUTH ALLEGHENY STREET, at Bellefonte, Pennsylvania, on
WEDNESDAY, MAY 16, 2012 at 10:00 A. M. to testify on behalf of
DEFENDANT in the above captioned case

and to remain until excused.

And bring with you the following: COMPLETE AND NON-REDACTED COPIES OF
THE INFORMATION REQUESTED IN THE SUBPOENA ATTACHMENT.

Witness, the Honorable, Thomas K. Kistler, President Judge of our said
Court at Bellefonte, this 5TH day of APRIL, A.D. 20 12

 Prothonotary

If you fail to attend or to produce the documents or things required by this Subpoena, you may be
subject to the sanctions authorized by Rule 234.5 of the Pennsylvania rules of Procedure, including, but
not limited to, costs, attorney fees, and imprisonment.

JOSEPH L. AMENDOLA

ATTORNEY-AT-LAW
110 REGENT COURT
SUITE 202
STATE COLLEGE, PA 16801-7966

TELEPHONE
814-234-6821

FAX
814-234-6013

SUBPOENA ATTACHMENT

Mr. John E. Wetzel, Secretary
Pennsylvania Department of Corrections
2520 Lisburn Road
P.O. Box 598
Camp Hill, PA 17001-4859

**Re: Commonwealth of Pennsylvania vs. Gerald A. Sandusky,
Nos. CP-14-CR-2421-2011 & CP-14-CR-2422-2011**

Dear Secretary Wetzel:

Please make certain the names listed in the contents of this correspondence be given the utmost consideration from being made public in order to comply with the Order of the Court dated March 13, 2012 which I have enclosed for your information. This Order applies to all person(s) who may gain knowledge of the names.

Pursuant to the enclosed Subpoena and Subpoena Attachment, you are requested to provide Joseph L. Amendola, Esquire, 110 Regent Court, Suite 202, State College, PA. 16801 with copies of Department of Correction records, documents and reports as well as other information kept and maintained by the Department, as described in this Subpoena Attachment. Should your Department have no records on any of the individuals listed below, please indicate so. The following records, documents and reports are to be provided in their original form with no redactions and/or pages omitted:

A. All Department of Corrections records that pertain to the following individuals as follows: [REDACTED]

[REDACTED] to include:

1. All "Classification Records" from the initial period of time at a Department of Corrections classification center to include psychological/psychiatric or medical records and related documents that are mandated by Department of Corrections policy and regulation that are completed on all new inmates that enter the Department's system;

2. All "Block Cards", DC-14, DC-15 files from the initial reception of the Department's location as well as the Department of Corrections location selected for the individual to complete the mandated county sentence;

3. All counselor records and files and inmate infraction violation records that resulted in the inmate being placed in RHU, and/or any other restricted level within the classification center or the location selected to finish the mandated sentence of the Court;

4. All records regarding the inmate as kept and maintained within the Security Captain's system of records at the classification center as well as the Department of Corrections location for completion of sentence;

5. All Department records requested by use of a subpoena/search warrant served by the Office of Attorney General or the Pennsylvania State Police as it relates to records requested based upon these cases.

B. Defense counsel is reasonably confident that [REDACTED] was an inmate at a state facility under the case and control of the Department of Corrections from a sentence imposed by the Clearfield County, Pennsylvania Court. Please provide all records that pertain to [REDACTED] as well as all others that pertain to any report by the inmate that was found to be without merit and or classified as a "false report" after an investigation regardless if the complaint was filed against personnel or fellow inmate(s).

Truly,



Joseph L. Amendola, Esquire

JLA:dka

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY,
PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA :

VS. :

CP-14-CR-2421-2011
CP-14-CR-2422-2011

GERALD A. SANDUSKY :

ORDER

AND NOW, MARCH 13, 2012, to carry out the agreement reached between counsel, It is ordered as follows:

1. The names of persons heretofore identified as Victims 1 through 10 shall remain protected under the seal of the Court and may not be disclosed by any person, except pursuant to court order or other authorization of the court.
2. Any subpoena seeking records regarding the alleged victims who have been publicly identified to date only as Victims 1 through 10 from child welfare agencies; physicians, hospitals or other medical providers; mental health providers; schools; social service agencies; or the like, shall have affixed to the front of the subpoena in at least 18 point type the following notice:

NOTICE

BY ORDER OF THE COURT OF COMMON PLEAS OF CENTRE COUNTY PENNSYLVANIA, DATED MARCH 13, 2012, ANY PERSON OR AGENCY RECEIVING THIS SUBPOENA IS NOTIFIED THAT THE NAME OR ANY IDENTIFYING INFORMATION OF THE PERSON FOR WHOM THE RECORDS OR OTHER INFORMATION IS SOUGHT IS PROTECTED BY THE SEAL OF THE COURT.


UNDER POTENTIAL PENALTY OF CONTEMPT OF COURT, THE PERSON'S NAME OR IDENTIFYING INFORMATION MAY NOT BE DISCLOSED TO ANY PERSON EXCEPT AS REQUIRED TO COMPLY WITH THIS SUBPOENA.

FILED FOR RECORD

2012 MAR 13 A 9:03

DEBRA C. IMEL
PROTHONOTARY
CENTRE COUNTY, PA

By the Court:


John M. Cleland, S.J.
Specially Presiding

IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA :

v. :

GERALD A. SANDUSKY :

NOS: CP-14-CR-2421-2011 &
CP-14-CR-2422-2011

Commonwealth Attorneys:

Joseph McGettigan, Esquire

Jonelle H. Eshbach, Esquire

Defense Attorney:

Joseph L. Amendola, Esquire

CERTIFICATE OF SERVICE

AND NOW, this 7th day of May, 2012, I, Jarad W. Handelman, hereby certify that I have, this date, served a copy of the foregoing document, by:

Hand Delivery

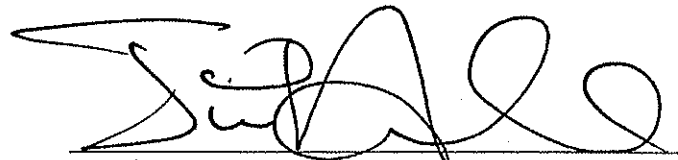
Hon. John M. Cleland, Senior Judge
c/o Ms. Maxine Ishler, Court Administrator
Centre County Courthouse
102 South Allegheny Street
Belleville, PA 16823

Mailed U.S. Mail First Class and Electronic Delivery

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Deputy Attorney General
Office of Attorney General
Criminal Prosecutions Section
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Norristown, PA 19403

Jonelle H. Eshbach, Esquire
Senior Deputy Attorney General
Office of Attorney General
Criminal Prosecutions Section
16th Floor – Strawberry Square
Harrisburg, PA 17120

Joseph L. Amendola, Esquire
110 Regent Court, Suite 202
State College, PA 16801



Jarad W. Handelman
Attorney ID No. 82629
Deputy General Counsel
Office of General Counsel
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FILED FOR RECORD
2012 MAY - 8 P 2:41
DEBRA C. IMMEL
PROTHONOTARY
CENTRE COUNTY, PA