



Jennifer Snyder <secretarygreggtownship@gmail.com>

Appeal No. AP 2018-1290

16 messages

David Gaines <dgaines@mkclaw.com>

Wed, Jul 25, 2018 at 3:48 PM

To: "Zeppos, Magdalene" <mzeppos@pa.gov>

Cc: Michelle Grove <michelleyvonnegrove@gmail.com>, Gregg Twp Secretary <secretary@greggtownship.org>

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.
MILLER, KISTLER & CAMPBELL
[720 South Atherton Street, Suite 201](#)
[State College, PA 16801](#)-4669
814-234-1500 TEL
814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

Michelle Grove <michelleyvonnegrove@gmail.com>

Wed, Jul 25, 2018 at 4:19 PM

To: David Gaines <dgaines@mkclaw.com>

Cc: Gregg Twp Secretary <secretary@greggtownship.org>, "Zeppos, Magdalene" <mzeppos@pa.gov>

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

Thu, Jul 26, 2018 at 7:27 AM

"Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

--

Jennifer Snyder, CGA
Secretary/Treasurer
Gregg Township, Centre County
106 School Street
PO BOX 184
Spring Mills PA 16875
814-422-8218

David Gaines <dgaines@mkclaw.com>

Thu, Jul 26, 2018 at 11:35 AM

To: Michelle Grove <michelleyvonnegrove@gmail.com>

Cc: David Gaines <dgaines@mkclaw.com>, Gregg Twp Secretary <secretary@greggtownship.org>, "Zeppos, Magdalene" <mzeppos@pa.gov>

Thank you.

David

David S. Gaines, Jr.
MILLER, KISTLER & CAMPBELL
720 South Atherton Street, Suite 201
State College, PA 16801-4669
814-234-1500 TEL
814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.
MILLER, KISTLER & CAMPBELL
720 South Atherton Street, Suite 201

[State College, PA 16801-4669](#)

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

Michelle Grove <michelleyvonnegrove@gmail.com>

Mon, Jul 30, 2018 at 11:32 PM

To: David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>, "Zeppos, Magdalene" <mzeppos@pa.gov>

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,
Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

[720 South Atherton Street, Suite 201](#)

[State College, PA 16801-4669](#)

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.
MILLER, KISTLER & CAMPBELL
720 South Atherton Street, Suite 201
State College, PA 16801-4669
814-234-1500 TEL
814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

Gregg Twp Secretary <secretary@greggtownship.org>

Tue, Jul 31, 2018 at 7:18 AM

To: Charles Stover <cws14@yahoo.com>, Douglas Bierly <supervisor1@greggtownship.org>, Keri Miller <KeriMiller.GreggTownship@gmail.com>

----- Forwarded message -----

From: **Michelle Grove** <michelleyvonnegrove@gmail.com>

Date: Mon, Jul 30, 2018 at 11:32 PM

Subject: Re: Appeal No. AP 2018-1290

To: David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>, "Zeppos, Magdalene" <mzeppos@pa.gov>

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,
Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.
MILLER, KISTLER & CAMPBELL
720 South Atherton Street, Suite 201
State College, PA 16801-4669
814-234-1500 TEL
814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.
MILLER, KISTLER & CAMPBELL
720 South Atherton Street, Suite 201
State College, PA 16801-4669
814-234-1500 TEL
814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

--

Jennifer Snyder, CGA
Secretary/Treasurer
Gregg Township, Centre County
106 School Street
PO BOX 184
Spring Mills PA 16875
814-422-8218

Zeppos, Magdalene <mzeppos@pa.gov>

Fri, Aug 3, 2018 at 2:52 PM

To: Michelle Grove <michelleyvonnegrove@gmail.com>, David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>

Dear Ms. Grove:



Appeals Officer
Office of Open Records
333 Market Street, 16th Floor

<https://openrecords.pa.gov> | @OpenRecordsPA

https://mail.google.com/mail/u/0/?ui=2&ik=0c6e6c84b4&jsver=ZugfVESOeXs.en.&cbl=gmail_fe_180816.11_p4&view=pt&q=%22exemption%20log%20 7/53

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

Michelle Grove <michelleyvonnegrove@gmail.com>

Fri, Aug 3, 2018 at 2:56 PM

To: "Zeppos, Magdalene" <mzeppos@pa.gov>

Cc: David Gaines <dgaines@mkclaw.com>, Jennifer Snyder <secretary@greggtownship.org>

Ms. Zeppos,

Yes, no problem.

Michelle

On Fri, Aug 3, 2018, 2:52 PM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Ms. Grove:

I write in regard to the above appeal. After reviewing the Township's submission, and as an interim step to conducting an *in camera* review, the OOR would like to further develop the record in this matter by requesting an exemption log. In order to do so, the OOR requests a 30-day extension to issue the Final Determination, such that the Final Determination would be issued on or before September 17, 2018. Kindly advise on or before August 6, 2018, if you agree to the extension. Please also note that upon

review of the exemption log, if the OOR finds that an *in camera* review is necessary, the OOR may request an additional extension. Thank you.

**Magdalene C. Zeppos, Esquire**

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [mailto:michelleyvonnegrove@gmail.com]

Sent: Monday, July 30, 2018 11:32 PM

To: David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>; Zeppos, Magdalene <mzeppos@pa.gov>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,

Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

Zeppos, Magdalene <mzeppos@pa.gov>

Fri, Aug 3, 2018 at 3:03 PM

To: Michelle Grove <michellyvonnegrove@gmail.com>, David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>

Dear Parties:

This will confirm that the Requester has agreed to extend the deadline for issuance of the Final Determination in the above matter. The Final Determination will now be issued on or before **September 17, 2018**.

Additionally, I have reviewed the Township's submission and require additional information to more fully develop the record in this appeal. To that end, the Office of Open Records directs the Township to submit an exemption log generally describing the records withheld and/or redacted. For each record withheld and/or redacted, the exemption log must contain the following information:

1. The date of the record;
2. A description of the type of record (e.g., e-mail, letter, text message, etc.);
3. The name and status of the author and each recipient of the record (e.g., attorney, county official/employee, etc.);

4. A general description of the subject matter of the record; and

5. A citation to the legal basis upon which each record is withheld or information redacted from the record.

Finally, the exemption log must be attested to by a person with actual knowledge of the contents of the records.

Please provide the requested exemption log on or before **August 17, 2018**.

Thank you all for your cooperation in this process.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [<mailto:michelleyvonnegrove@gmail.com>]

Sent: Friday, August 3, 2018 2:57 PM

To: Zeppos, Magdalene <mzeppos@pa.gov>

Cc: David Gaines <dgaines@mkclaw.com>; Jennifer Snyder <secretary@greggtownship.org>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

Yes, no problem.

Michelle

On Fri, Aug 3, 2018, 2:52 PM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Ms. Grove:

I write in regard to the above appeal. After reviewing the Township's submission, and as an interim step to conducting an *in camera* review, the OOR would like to further develop the record in this matter by requesting an exemption log. In order to do so, the OOR requests a 30-day extension to issue the Final Determination, such that the Final Determination would be issued on or before September 17, 2018. Kindly advise on or before August 6, 2018, if you agree to the extension. Please also note that upon review of the exemption log, if the OOR finds that an *in camera* review is necessary, the OOR may request an additional extension. Thank you.



Magdalene C. Zeppos, Esquire

Appeals Officer
Office of Open Records
333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [mailto:michelleyvonnegrove@gmail.com]

Sent: Monday, July 30, 2018 11:32 PM

To: David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>; Zeppos, Magdalene <mzeppos@pa.gov>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,
Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

Zeppos, Magdalene <mzeppos@pa.gov>

Tue, Aug 21, 2018 at 11:19 AM

To: Michelle Grove <michellyvonnegrove@gmail.com>, David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>

Dear Attorney Gaines:

I write in regard to the above appeal. As you are aware, the OOR directed the Township to submit an Exemption Log, as set forth below, on or before **August 17, 2018**. To date, the OOR is not in receipt of the Exemption Log. Please provide the Exemption Log by the end of today, **August 21, 2018**. Thank you.

**Magdalene C. Zeppos, Esquire**

Appeals Officer
Office of Open Records
333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Zeppos, Magdalene
Sent: Friday, August 3, 2018 3:04 PM
To: 'Michelle Grove' <michelleyvonnegrove@gmail.com>; David Gaines <dgaines@mkclaw.com>
Cc: Jennifer Snyder <secretary@greggtownship.org>
Subject: RE: Appeal No. AP 2018-1290

Dear Parties:

This will confirm that the Requester has agreed to extend the deadline for issuance of the Final Determination in the above matter. The Final Determination will now be issued on or before **September 17, 2018**.

Additionally, I have reviewed the Township's submission and require additional information to more fully develop the record in this appeal. To that end, the Office of Open Records directs the Township to submit an exemption log generally describing the records withheld and/or redacted. For each record withheld and/or redacted, the exemption log must contain the following information:

1. The date of the record;
2. A description of the type of record (e.g., e-mail, letter, text message, etc.);
3. The name and status of the author and each recipient of the record (e.g., attorney, county official/employee, etc.);
4. A general description of the subject matter of the record; and
5. A citation to the legal basis upon which each record is withheld or information redacted from the record.

Finally, the exemption log must be attested to by a person with actual knowledge of the contents of the records.

Please provide the requested exemption log on or before **August 17, 2018**.

Thank you all for your cooperation in this process.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [<mailto:michelleyvonnegrove@gmail.com>]

Sent: Friday, August 3, 2018 2:57 PM

To: Zeppos, Magdalene <mzeppos@pa.gov>

Cc: David Gaines <dgaines@mkclaw.com>; Jennifer Snyder <secretary@greggtownship.org>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

Yes, no problem.

Michelle

On Fri, Aug 3, 2018, 2:52 PM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Ms. Grove:

I write in regard to the above appeal. After reviewing the Township's submission, and as an interim step to conducting an *in camera* review, the OOR would like to further develop the record in this matter by requesting an exemption log. In order to do so, the OOR requests a 30-day extension to issue the Final Determination, such that the Final Determination would be issued on or before September 17, 2018. Kindly advise on or before August 6, 2018, if you agree to the extension. Please also note that upon review of the exemption log, if the OOR finds that an *in camera* review is necessary, the OOR may request an additional extension. Thank you.

**Magdalene C. Zeppos, Esquire**

Appeals Officer
Office of Open Records
333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [mailto:michelleyvonnegrove@gmail.com]

Sent: Monday, July 30, 2018 11:32 PM

To: David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>; Zeppos, Magdalene <mzeppos@pa.gov>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,

Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

Gregg Twp Secretary <secretary@greggtownship.org>
To: Keri Miller <KeriMiller.GreggTownship@gmail.com>

Tue, Aug 21, 2018 at 11:35 AM

----- Forwarded message -----

From: **Zeppos, Magdalene** <mzeppos@pa.gov>

Date: Tue, Aug 21, 2018 at 11:19 AM

Subject: RE: Appeal No. AP 2018-1290

To: Michelle Grove <michelleyvonnegrove@gmail.com>, David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>

Dear Attorney Gaines:

I write in regard to the above appeal. As you are aware, the OOR directed the Township to submit an Exemption Log, as set forth below, on or before **August 17, 2018**. To date, the OOR is not in receipt of the Exemption Log. Please provide the Exemption Log by the end of today, **August 21, 2018**. Thank you.

**Magdalene C. Zeppos, Esquire**

Appeals Officer
Office of Open Records
333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Zeppos, Magdalene
Sent: Friday, August 3, 2018 3:04 PM
To: 'Michelle Grove' <michelleyvonnegrove@gmail.com>; David Gaines <dgaines@mkclaw.com>
Cc: Jennifer Snyder <secretary@greggtownship.org>
Subject: RE: Appeal No. AP 2018-1290

Dear Parties:

This will confirm that the Requester has agreed to extend the deadline for issuance of the Final Determination in the above matter. The Final Determination will now be issued on or before **September 17, 2018**.

Additionally, I have reviewed the Township's submission and require additional information to more fully develop the record in this appeal. To that end, the Office of Open Records directs the Township to submit an exemption log generally describing the records withheld and/or redacted. For each record withheld and/or redacted, the exemption log must contain the following information:

1. The date of the record;
2. A description of the type of record (e.g., e-mail, letter, text message, etc.);
3. The name and status of the author and each recipient of the record (e.g., attorney, county official/employee, etc.);
4. A general description of the subject matter of the record; and
5. A citation to the legal basis upon which each record is withheld or information redacted from the record.

Finally, the exemption log must be attested to by a person with actual knowledge of the contents of the records.

Please provide the requested exemption log on or before **August 17, 2018**.

Thank you all for your cooperation in this process.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [<mailto:michelleyvonnegrove@gmail.com>]

Sent: Friday, August 3, 2018 2:57 PM

To: Zeppos, Magdalene <mzeppos@pa.gov>

Cc: David Gaines <dgaines@mkclaw.com>; Jennifer Snyder <secretary@greggtownship.org>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

Yes, no problem.

Michelle

On Fri, Aug 3, 2018, 2:52 PM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Ms. Grove:

I write in regard to the above appeal. After reviewing the Township's submission, and as an interim step to conducting an *in camera* review, the OOR would like to further develop the record in this matter by requesting an exemption log. In order to do so, the OOR requests a 30-day extension to issue the Final Determination, such that the Final Determination would be issued on or before September 17, 2018. Kindly advise on or before August 6, 2018, if you agree to the extension. Please also note that upon review of the exemption log, if the OOR finds that an *in camera* review is necessary, the OOR may request an additional extension. Thank you.

**Magdalene C. Zeppos, Esquire**

Appeals Officer
Office of Open Records
333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [mailto:michelleyvonnegrove@gmail.com]

Sent: Monday, July 30, 2018 11:32 PM

To: David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>; Zeppos, Magdalene <mzeppos@pa.gov>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,

Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

--

Jennifer Snyder, CGA
Secretary/Treasurer
Gregg Township, Centre County
106 School Street
PO BOX 184
Spring Mills PA 16875
814-422-8218

Gregg Twp Secretary <secretary@greggtownship.org>
To: Keri Miller <KeriMiller.GreggTownship@gmail.com>

Tue, Aug 21, 2018 at 11:37 AM

----- Forwarded message -----

From: **Zeppos, Magdalene** <mzeppos@pa.gov>

Date: Fri, Aug 3, 2018 at 3:03 PM

Subject: RE: Appeal No. AP 2018-1290

To: Michelle Grove <michelleyvonnegrove@gmail.com>, David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>

Dear Parties:

This will confirm that the Requester has agreed to extend the deadline for issuance of the Final Determination in the above matter. The Final Determination will now be issued on or before **September 17, 2018**.

Additionally, I have reviewed the Township's submission and require additional information to more fully develop the record in this appeal. To that end, the Office of Open Records directs the Township to submit an exemption log generally describing the records withheld and/or redacted. For each record withheld and/or redacted, the exemption log must contain the following information:

1. The date of the record;
2. A description of the type of record (e.g., e-mail, letter, text message, etc.);
3. The name and status of the author and each recipient of the record (e.g., attorney, county official/employee, etc.);
4. A general description of the subject matter of the record; and
5. A citation to the legal basis upon which each record is withheld or information redacted from the record.

Finally, the exemption log must be attested to by a person with actual knowledge of the contents of the records.

Please provide the requested exemption log on or before **August 17, 2018**.

Thank you all for your cooperation in this process.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [mailto:michelleyvonnegrove@gmail.com]
Sent: Friday, August 3, 2018 2:57 PM
To: Zeppos, Magdalene <mzeppos@pa.gov>
Cc: David Gaines <dgaines@mkclaw.com>; Jennifer Snyder <secretary@greggtownship.org>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

Yes, no problem.

Michelle

On Fri, Aug 3, 2018, 2:52 PM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Ms. Grove:

I write in regard to the above appeal. After reviewing the Township's submission, and as an interim step to conducting an *in camera* review, the OOR would like to further develop the record in this matter by requesting an exemption log. In order to do so, the OOR requests a 30-day extension to issue the Final Determination, such that the Final Determination would be issued on or before September 17, 2018. Kindly advise on or before August 6, 2018, if you agree to the extension. Please also note that upon review of the exemption log, if the OOR finds that an *in camera* review is necessary, the OOR may request an additional extension. Thank you.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [mailto:michelleyvonnegrove@gmail.com]
Sent: Monday, July 30, 2018 11:32 PM
To: David Gaines <dgaines@mkclaw.com>
Cc: Jennifer Snyder <secretary@greggtownship.org>; Zeppos, Magdalene <mzeppos@pa.gov>
Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,

Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it

is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

--

Jennifer Snyder, CGA
Secretary/Treasurer
Gregg Township, Centre County
106 School Street
PO BOX 184
Spring Mills PA 16875
814-422-8218

Michelle Grove <michelleyvonnegrove@gmail.com>

Tue, Aug 21, 2018 at 11:37 PM

To: "Zeppos, Magdalene" <mzeppos@pa.gov>

Cc: David Gaines <dgaines@mkclaw.com>, Jennifer Snyder <secretary@greggtownship.org>

Ms. Zeppos,

If the township does not submit anything, I ASK THE OOR FOR A BAD FAITH RULING.

The township has many Final Determinations they have not complied with, including another one for Ms. Miller's emails. The township has not provided records awarded to me in the Commonwealth Court. In the past, they did not provide other records that were ordered in the Court of Common Pleas. The township has previously destroyed at least one record that had already been requested, per their own admission to the Court of Common Pleas. Last year a Township Supervisor made a speech during a meeting, saying they didn't have records that they did, in fact, have (I recorded this and have the records now). The township has tried to deter me with fees the OOR recently determined they were not entitled to (and they will not return), listing all of my RTK Requests on the agenda, giving a "RTK Report," and more. I swear to all of this under 18 Pa.C.S.A. § 4904.

For the record, Jennifer Snyder is the AORO, and Keri Miller (the subject of this RTK Request) is the Alternate AORO. The office is open M-F and both woman are there almost every time I go in. There is NO good reason for the township to ignore the OOR. A bad faith ruling is long overdue, in my opinion.

Respectfully,
Michelle Grove

On Tue, Aug 21, 2018, 11:19 AM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Attorney Gaines:

I write in regard to the above appeal. As you are aware, the OOR directed the Township to submit an Exemption Log, as set forth below, on or before **August 17, 2018**. To date, the OOR is not in receipt of the Exemption Log. Please provide the Exemption Log by the end of today, **August 21, 2018**. Thank you.

Magdalene C. Zeppos, Esquire



Appeals Officer
Office of Open Records
333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Zeppos, Magdalene
Sent: Friday, August 3, 2018 3:04 PM
To: 'Michelle Grove' <michelleyvonnegrove@gmail.com>; David Gaines <dgaines@mkclaw.com>
Cc: Jennifer Snyder <secretary@greggtownship.org>
Subject: RE: Appeal No. AP 2018-1290

Dear Parties:

This will confirm that the Requester has agreed to extend the deadline for issuance of the Final Determination in the above matter. The Final Determination will now be issued on or before **September 17, 2018**.

Additionally, I have reviewed the Township's submission and require additional information to more fully develop the record in this appeal. To that end, the Office of Open Records directs the Township to submit an exemption log generally describing the records withheld and/or redacted. For each record withheld and/or redacted, the exemption log must contain the following information:

1. The date of the record;
2. A description of the type of record (e.g., e-mail, letter, text message, etc.);
3. The name and status of the author and each recipient of the record (e.g., attorney, county official/employee, etc.);
4. A general description of the subject matter of the record; and
5. A citation to the legal basis upon which each record is withheld or information redacted from the record.

Finally, the exemption log must be attested to by a person with actual knowledge of the contents of the records.

Please provide the requested exemption log on or before **August 17, 2018**.

Thank you all for your cooperation in this process.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [<mailto:michellyvonnegrove@gmail.com>]

Sent: Friday, August 3, 2018 2:57 PM

To: Zeppos, Magdalene <mzeppos@pa.gov>

Cc: David Gaines <dgaines@mkclaw.com>; Jennifer Snyder <secretary@greggtownship.org>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

Yes, no problem.

Michelle

On Fri, Aug 3, 2018, 2:52 PM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Ms. Grove:

I write in regard to the above appeal. After reviewing the Township's submission, and as an interim step to conducting an *in camera* review, the OOR would like to further develop the record in this matter by requesting an exemption log. In order to do so, the OOR requests a 30-day extension to issue the Final Determination, such that the Final Determination would be issued on or before September 17, 2018. Kindly advise on or before August 6, 2018, if you agree to the extension. Please also note that upon review of the exemption log, if the OOR finds that an *in camera* review is necessary, the OOR may request an additional extension. Thank you.

**Magdalene C. Zeppos, Esquire**

Appeals Officer
Office of Open Records
333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [mailto:michelleyvonnegrove@gmail.com]

Sent: Monday, July 30, 2018 11:32 PM

To: David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>; Zeppos, Magdalene <mzeppos@pa.gov>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,

Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

[720 South Atherton Street, Suite 201](#)

[State College, PA 16801-4669](#)

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

Michelle Grove <michelleyvonnegrove@gmail.com>

Tue, Aug 21, 2018 at 11:55 PM

To: "Zeppos, Magdalene" <mzeppos@pa.gov>

Cc: David Gaines <dgaines@mkclaw.com>, Jennifer Snyder <secretary@greggtownship.org>

Excuse me, that should say "they did not timely provide other records that were ordered in the Court of Common Pleas." To be more clear about that situation, the Court of Common Pleas ordered the township to provide all responsive records to my husband (Casey Grove) within 30 days. They did not, and a Petition for Writ of Mandamus was filed. The township then told the court there were no records to provide (they were all destroyed). Supervisor Joel Myers then told the public all the responsive records were destroyed, then Jennifer Snyder admitted (to me) after that meeting that they did still have responsive records (other than the one claimed to have been destroyed right after the request, out of order and against their own policy). A request for a rehearing/reconsideration was filed by my husband. Only then did the township provide records. I swear to all of this under 18 Pa.C.S.A. § 4904.

On Tue, Aug 21, 2018, 11:37 PM Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

Ms. Zeppos,

If the township does not submit anything, I ASK THE OOR FOR A BAD FAITH RULING.

The township has many Final Determinations they have not complied with, including another one for Ms. Miller's emails. The township has not provided records awarded to me in the Commonwealth Court. In the past, they did not provide other records that were ordered in the Court of Common Pleas. The township has previously destroyed at least one record that had already been requested, per their own admission to the Court of Common Pleas. Last year a Township Supervisor made a speech during a meeting, saying they didn't have records that they did, in fact, have (I recorded this and have the records now). The township has tried to deter me with fees the OOR recently determined they were not entitled to (and they will not return), listing all of my RTK Requests on the agenda, giving a "RTK Report," and more. I swear to all of this under 18 Pa.C.S.A. § 4904.

For the record, Jennifer Snyder is the AORO, and Keri Miller (the subject of this RTK Request) is the Alternate AORO. The office is open M-F and both woman are there almost every time I go in. There is NO good reason for the township to ignore the OOR. A bad faith ruling is long overdue, in my opinion.

Respectfully,
Michelle Grove

On Tue, Aug 21, 2018, 11:19 AM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Attorney Gaines:

I write in regard to the above appeal. As you are aware, the OOR directed the Township to submit an Exemption Log, as set forth below, on or before **August 17, 2018**. To date, the OOR is not in receipt of the Exemption Log. Please provide the Exemption Log by the end of today, **August 21, 2018**. Thank you.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Zeppos, Magdalene

Sent: Friday, August 3, 2018 3:04 PM

To: 'Michelle Grove' <michelleyvonnegrove@gmail.com>; David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>

Subject: RE: Appeal No. AP 2018-1290

Dear Parties:

This will confirm that the Requester has agreed to extend the deadline for issuance of the Final Determination in the above matter. The Final Determination will now be issued on or before **September 17, 2018**.

Additionally, I have reviewed the Township's submission and require additional information to more fully develop the record in this appeal. To that end, the Office of Open Records directs the Township to submit an exemption log generally describing the records withheld and/or redacted. For each record withheld and/or redacted, the exemption log must contain the following information:

1. The date of the record;
2. A description of the type of record (e.g., e-mail, letter, text message, etc.);
3. The name and status of the author and each recipient of the record (e.g., attorney, county official/employee, etc.);
4. A general description of the subject matter of the record; and
5. A citation to the legal basis upon which each record is withheld or information redacted from the record.

Finally, the exemption log must be attested to by a person with actual knowledge of the contents of the records.

Please provide the requested exemption log on or before **August 17, 2018**.

Thank you all for your cooperation in this process.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [<mailto:michelleyvonnegrove@gmail.com>]

Sent: Friday, August 3, 2018 2:57 PM

To: Zeppos, Magdalene <mzeppos@pa.gov>
Cc: David Gaines <dgaines@mkclaw.com>; Jennifer Snyder <secretary@greggtownship.org>
Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

Yes, no problem.

Michelle

On Fri, Aug 3, 2018, 2:52 PM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Ms. Grove:

I write in regard to the above appeal. After reviewing the Township's submission, and as an interim step to conducting an *in camera* review, the OOR would like to further develop the record in this matter by requesting an exemption log. In order to do so, the OOR requests a 30-day extension to issue the Final Determination, such that the Final Determination would be issued on or before September 17, 2018. Kindly advise on or before August 6, 2018, if you agree to the extension. Please also note that upon review of the exemption log, if the OOR finds that an *in camera* review is necessary, the OOR may request an additional extension. Thank you.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [mailto:michelleyvonnegrove@gmail.com]
Sent: Monday, July 30, 2018 11:32 PM
To: David Gaines <dgaines@mkclaw.com>
Cc: Jennifer Snyder <secretary@greggtownship.org>; Zeppos, Magdalene <mzeppos@pa.gov>
Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,

Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

[720 South Atherton Street, Suite 201](#)

[State College, PA 16801-4669](#)

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

Gregg Twp Secretary <secretary@greggtownship.org>

Wed, Aug 22, 2018 at 7:17 AM

To: Charles Stover <cws14@yahoo.com>, Douglas Bierly <supervisor1@greggtownship.org>, Keri Miller <KeriMiller.GreggTownship@gmail.com>

----- Forwarded message -----

From: **Michelle Grove** <michelleyvonnegrove@gmail.com>

Date: Tue, Aug 21, 2018 at 11:37 PM

Subject: Re: Appeal No. AP 2018-1290

To: "Zeppos, Magdalene" <mzeppos@pa.gov>

Cc: David Gaines <dgaines@mkclaw.com>, Jennifer Snyder <secretary@greggtownship.org>

Ms. Zeppos,

If the township does not submit anything, I ASK THE OOR FOR A BAD FAITH RULING.

The township has many Final Determinations they have not complied with, including another one for Ms. Miller's emails. The township has not provided records awarded to me in the Commonwealth Court. In the past, they did not provide other records that were ordered in the Court of Common Pleas. The township has previously destroyed at least one record that had already been requested, per their own admission to the Court of Common Pleas. Last year a Township Supervisor made a speech during a meeting, saying they didn't have records that they did, in fact, have (I recorded this and have the records now). The township has tried to deter me with fees the OOR recently determined they were not entitled to (and they will not return), listing all of my RTK Requests on the agenda, giving a "RTK Report," and more. I swear to all of this under 18 Pa.C.S.A. § 4904.

For the record, Jennifer Snyder is the AORO, and Keri Miller (the subject of this RTK Request) is the Alternate AORO. The office is open M-F and both woman are there almost every time I go in. There is NO good reason for the township to ignore the OOR. A bad faith ruling is long overdue, in my opinion.

Respectfully,
Michelle Grove

On Tue, Aug 21, 2018, 11:19 AM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Attorney Gaines:

I write in regard to the above appeal. As you are aware, the OOR directed the Township to submit an Exemption Log, as set forth below, on or before **August 17, 2018**. To date, the OOR is not in receipt of the Exemption Log. Please provide the Exemption Log by the end of today, **August 21, 2018**. Thank you.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Zeppos, Magdalene
Sent: Friday, August 3, 2018 3:04 PM
To: 'Michelle Grove' <michelleyvonnegrove@gmail.com>; David Gaines <dgaines@mkclaw.com>
Cc: Jennifer Snyder <secretary@greggtownship.org>
Subject: RE: Appeal No. AP 2018-1290

Dear Parties:

This will confirm that the Requester has agreed to extend the deadline for issuance of the Final Determination in the above matter. The Final Determination will now be issued on or before **September 17, 2018**.

Additionally, I have reviewed the Township's submission and require additional information to more fully develop the record in this appeal. To that end, the Office of Open Records directs the Township to submit an exemption log generally describing the records withheld and/or redacted. For each record withheld and/or redacted, the exemption log must contain the following information:

1. The date of the record;
2. A description of the type of record (e.g., e-mail, letter, text message, etc.);
3. The name and status of the author and each recipient of the record (e.g., attorney, county official/employee, etc.);
4. A general description of the subject matter of the record; and
5. A citation to the legal basis upon which each record is withheld or information redacted from the record.

Finally, the exemption log must be attested to by a person with actual knowledge of the contents of the records.

Please provide the requested exemption log on or before **August 17, 2018**.

Thank you all for your cooperation in this process.

**Magdalene C. Zeppos, Esquire**

Appeals Officer
Office of Open Records
333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [<mailto:michelleyvonnegrove@gmail.com>]

Sent: Friday, August 3, 2018 2:57 PM

To: Zeppos, Magdalene <mzeppos@pa.gov>

Cc: David Gaines <dgaines@mkclaw.com>; Jennifer Snyder <secretary@greggtownship.org>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

Yes, no problem.

Michelle

On Fri, Aug 3, 2018, 2:52 PM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Ms. Grove:

I write in regard to the above appeal. After reviewing the Township's submission, and as an interim step to conducting an *in camera* review, the OOR would like to further develop the record in this matter by requesting an exemption log. In order to do so, the OOR requests a 30-day extension to issue the Final Determination, such that the Final Determination would be issued on or before September 17, 2018. Kindly advise on or before August 6, 2018, if you agree to the extension. Please also note that upon review of the exemption log, if the OOR finds that an *in camera* review is necessary, the OOR may request an additional extension. Thank you.

**Magdalene C. Zeppos, Esquire**

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [mailto:michelleyvonnegrove@gmail.com]

Sent: Monday, July 30, 2018 11:32 PM

To: David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>; Zeppos, Magdalene <mzeppos@pa.gov>

Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,

Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

--

Jennifer Snyder, CGA
Secretary/Treasurer
Gregg Township, Centre County
106 School Street
PO BOX 184
Spring Mills PA 16875
814-422-8218

Gregg Twp Secretary <secretary@greggtownship.org>

Wed, Aug 22, 2018 at 7:17 AM

To: Charles Stover <cws14@yahoo.com>, Douglas Bierly <supervisor1@greggtownship.org>, Keri Miller <KeriMiller.GreggTownship@gmail.com>

----- Forwarded message -----

From: **Michelle Grove** <michelleyvonnegrove@gmail.com>

Date: Tue, Aug 21, 2018 at 11:55 PM

Subject: Re: Appeal No. AP 2018-1290

To: "Zeppos, Magdalene" <mzeppos@pa.gov>

Cc: David Gaines <dgaines@mkclaw.com>, Jennifer Snyder <secretary@greggtownship.org>

Excuse me, that should say "they did not timely provide other records that were ordered in the Court of Common Pleas." To be more clear about that situation, the Court of Common Pleas ordered the township to provide all responsive records to my husband (Casey Grove) within 30 days. They did not, and a Petition for Writ of Mandamus was filed. The township then told the court there were no records to provide (they were all destroyed). Supervisor Joel Myers then told the public all the responsive records were destroyed, then Jennifer Snyder admitted (to me) after that meeting that they did still have responsive records (other than the one claimed to have been destroyed right after the request, out of order and against their own policy). A request for a rehearing/reconsideration was filed by my husband. Only then did the township provide records. I swear to all of this under 18 Pa.C.S.A. § 4904.

On Tue, Aug 21, 2018, 11:37 PM Michelle Grove <michelleyvonnegrove@gmail.com> wrote:
Ms. Zeppos,

If the township does not submit anything, I ASK THE OOR FOR A BAD FAITH RULING.

The township has many Final Determinations they have not complied with, including another one for Ms. Miller's emails. The township has not provided records awarded to me in the Commonwealth Court. In the past, they did not provide other records that were ordered in the Court of Common Pleas. The township has previously destroyed at least one record that had already been requested, per their own admission to the Court of Common Pleas. Last year a Township Supervisor made a speech during a meeting, saying they didn't have records that they did, in fact, have (I recorded this and have the records now). The township has tried to deter me with fees the OOR recently determined they were not entitled to (and they will not return), listing all of my RTK Requests on the agenda, giving a "RTK Report," and more. I swear to all of this under 18 Pa.C.S.A. § 4904.

For the record, Jennifer Snyder is the AORO, and Keri Miller (the subject of this RTK Request) is the Alternate AORO. The office is open M-F and both woman are there almost every time I go in. There is NO good reason for the township to ignore the OOR. A bad faith ruling is long overdue, in my opinion.

Respectfully,
Michelle Grove

On Tue, Aug 21, 2018, 11:19 AM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Attorney Gaines:

I write in regard to the above appeal. As you are aware, the OOR directed the Township to submit an Exemption Log, as set forth below, on or before **August 17, 2018**. To date, the OOR is not in receipt of the Exemption Log. Please provide the Exemption Log by the end of today, **August 21, 2018**. Thank you.



Magdalene C. Zeppos, Esquire

Appeals Officer
Office of Open Records
333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Zeppos, Magdalene

Sent: Friday, August 3, 2018 3:04 PM

To: 'Michelle Grove' <michelleynonnegrove@gmail.com>; David Gaines <dgaines@mkclaw.com>

Cc: Jennifer Snyder <secretary@greggtownship.org>

Subject: RE: Appeal No. AP 2018-1290

Dear Parties:

This will confirm that the Requester has agreed to extend the deadline for issuance of the Final Determination in the above matter. The Final Determination will now be issued on or before **September 17, 2018**.

Additionally, I have reviewed the Township's submission and require additional information to more fully develop the record in this appeal. To that end, the Office of Open Records directs the Township to submit an exemption log generally describing the records withheld and/or redacted. For each record withheld and/or redacted, the exemption log must contain the following information:

1. The date of the record;
2. A description of the type of record (e.g., e-mail, letter, text message, etc.);
3. The name and status of the author and each recipient of the record (e.g., attorney, county official/employee, etc.);
4. A general description of the subject matter of the record; and
5. A citation to the legal basis upon which each record is withheld or information redacted from the record.

Finally, the exemption log must be attested to by a person with actual knowledge of the contents of the records.

Please provide the requested exemption log on or before **August 17, 2018**.

Thank you all for your cooperation in this process.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [<mailto:michelleyvonnegrove@gmail.com>]
Sent: Friday, August 3, 2018 2:57 PM
To: Zeppos, Magdalene <mzeppos@pa.gov>
Cc: David Gaines <dgaines@mkclaw.com>; Jennifer Snyder <secretary@greggtownship.org>
Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

Yes, no problem.

Michelle

On Fri, Aug 3, 2018, 2:52 PM Zeppos, Magdalene <mzeppos@pa.gov> wrote:

Dear Ms. Grove:

I write in regard to the above appeal. After reviewing the Township's submission, and as an interim step to conducting an *in camera* review, the OOR would like to further develop the record in this matter by requesting an exemption log. In order to do so, the OOR requests a 30-day extension to issue the Final Determination, such that the Final Determination would be issued on or before September 17, 2018. Kindly advise on or before August 6, 2018, if you agree to the extension. Please also note that upon review of the exemption log, if the OOR finds that an *in camera* review is necessary, the OOR may request an additional extension. Thank you.



Magdalene C. Zeppos, Esquire

Appeals Officer

Office of Open Records

333 Market Street, 16th Floor

Harrisburg, PA 17101-2234

(717) 346-9903 | mzeppos@pa.gov

<https://openrecords.pa.gov> | @OpenRecordsPA

Confidentiality Notice: This electronic communication is privileged and confidential and is intended only for the party to whom it is addressed. If received in error, please return to sender.

From: Michelle Grove [mailto:michelleyvonnegrove@gmail.com]
Sent: Monday, July 30, 2018 11:32 PM
To: David Gaines <dgaines@mkclaw.com>
Cc: Jennifer Snyder <secretary@greggtownship.org>; Zeppos, Magdalene <mzeppos@pa.gov>
Subject: Re: Appeal No. AP 2018-1290

Ms. Zeppos,

If the township provided an attestation meeting all of the requirements for attorney-client privilege, I request an in-camera review to confirm the exemption.

Their attestations have not been reliable in the past. I swear to this statement under 4904.

Respectfully,

Michelle Grove

On Thu, Jul 26, 2018, 11:36 AM David Gaines <dgaines@mkclaw.com> wrote:

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

720 South Atherton Street, Suite 201

State College, PA 16801-4669

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

On Wed, Jul 25, 2018 at 4:19 PM, Michelle Grove <michelleyvonnegrove@gmail.com> wrote:

David,

Of course. All of the responsive records were not provided. I challenge the exemption cited in the denial of those records.

Michelle

On Wed, Jul 25, 2018, 3:49 PM David Gaines <dgaines@mkclaw.com> wrote:

Ms. Zeppos and Ms. Grove,

I am currently assisting Gregg Township with its response to appeal number AP 2018-1290. In that appeal, Ms. Grove left the "Reasons for Appeal" blank.

Can Ms. Grove please clarify her reasons for filing the appeal? This will obviously help us provide a response.

Thank you.

David

David S. Gaines, Jr.

MILLER, KISTLER & CAMPBELL

[720 South Atherton Street, Suite 201](#)

[State College, PA 16801-4669](#)

814-234-1500 TEL

814-234-1549 FAX

[Web](#) | [Facebook](#) | [LinkedIn](#) | [Super Lawyers](#)

This electronic mail transmission is privileged, confidential, and intended only for the review of the party or parties to whom it is intended to be sent. If you have received this message in error, please immediately return it to the sender with a notation of "Wrong Address" in the subject line and then delete this message from your computer system. Unintended transmission to a wrong address shall not constitute a waiver of the attorney-client or any other privileges.

--

Jennifer Snyder, CGA
Secretary/Treasurer
Gregg Township, Centre County
106 School Street
PO BOX 184
Spring Mills PA 16875
814-422-8218



Jennifer Snyder <secretarygreggtownship@gmail.com>

RTK Gregg Twp ["exemption log"]

2 messages

Michelle Grove <michelleyvonnegrove@gmail.com>
To: Jennifer Snyder <secretary@greggtownship.org>

Tue, Aug 21, 2018 at 9:21 PM

This document was signed using Adobe Fill & Sign.
Get the app for iOS and Android.

Want to send document for signature and track responses? [Learn More about Adobe Sign.](#)

 **RTK Gregg Twp.pdf**
419K

Gregg Twp Secretary <secretary@greggtownship.org>

Wed, Aug 22, 2018 at 7:16 AM

To: Charles Stover <cws14@yahoo.com>, Douglas Bierly <supervisor1@greggtownship.org>, Keri Miller
<KeriMiller.GreggTownship@gmail.com>, David Gaines <dgaines@mkclaw.com>

----- Forwarded message -----

From: **Michelle Grove** <michelleyvonnegrove@gmail.com>

Date: Tue, Aug 21, 2018 at 9:21 PM

Subject: RTK Gregg Twp ["exemption log"]

To: Jennifer Snyder <secretary@greggtownship.org>

This document was signed using Adobe Fill & Sign.
Get the app for iOS and Android.

Want to send document for signature and track responses? [Learn More about Adobe Sign.](#)

--
Jennifer Snyder, CGA
Secretary/Treasurer
Gregg Township, Centre County
106 School Street
PO BOX 184
Spring Mills PA 16875
814-422-8218

 **RTK Gregg Twp.pdf**
419K