

Jennifer Snyder is the Right-to-Know officer for Gregg Township. In her attestation, Ms. Snyder confirms that she responded to the request and provided all

responsive documentation to Ms. Grove October 18, 2018. *Snyder Attestation* ¶ 3.

Ms. Grove now appeals.

II. Legal Argument

A. The Appeal Should Be Denied Because the Township Has Provided All Records Responsive to the Request.

The appeal should be denied because the Township has provided all responsive records. Ms. Snyder has confirmed that all responsive information was provided. Ms. Grove has provided no information to rebut that fact. The record, therefore, supports the Township's response.

B. The Township Has No Obligation to Obtain Records Relating to Purchases By a Third-Party.

It is similarly beyond cavil that the Township has no obligation to obtain records from a third-party entity that has no relationship to the Township. Ms. Grove concedes in her appeal that certain receipts are in the hands of a third party. Ms. Snyder has explained that the Penns Valley Youth Center, a separate entity, decided to pay for certain items relating to the sand volleyball court, independently from the Township. While it is true that Penns Valley Youth Center rents space in the Township's building, the Township has no obligation to seek information from that entity.


This situation may also be different if Ms. Grove did not file so many Right to Know requests. The simple fact of this matter is that, time and again, Ms. Grove

is given an inch and then takes a mile. The Township cannot start—out of pure concerns for time, energy, and money associated with Ms. Grove’s many Right to Know requests—seeking information from third parties.

III. Conclusion

For the reasons set forth above, the Respondent, Gregg Township, respectfully requests that the appeal filed by the Requester, Michelle Grove, be denied.

Respectfully submitted,



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Counsel for Respondent

Dated: November 14, 2018

BEFORE THE PENNSYLVANIA OFFICE OF OPEN RECORDS

IN THE MATTER OF:	:	
	:	
MICHELLE GROVE,	:	
	:	
Requester,	:	
	:	
v.	:	No. AP 2018-1972
	:	
GREGG TOWNSHIP,	:	
	:	
Respondent.	:	
_____	:	

ATTESTATION OF JENNIFER SNYDER

I, Jennifer Snyder, make the following attestation under the penalty of perjury:

1. I am the Right to Know Officer for the Respondent, Gregg Township ("Township").

2. I received a Standard Right to Know Request Form from Michelle Grove on October 12, 2018, which requested the following information:

ALL RECEIPTS FOR SAND VOLLEYBALL COURT

3. On October 18, 2018, I responded on behalf of the Township, granted the request, and provided Ms. Grove with all responsive documentation. A copy of that response is included with Ms. Grove's appeal.

4. Ms. Grove now complains that I did not provide her with all documentation, and that complaint is misplaced.

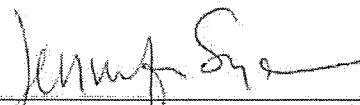
5. For one, to the extent that the Township paid for the sand volleyball court, the Township did so from a quote rather than a receipt.

6. Consequently, Ms. Grove's insistence that there will be a separate receipt is incorrect.

7. Second, the Penns Valley Youth Center installed the sand volleyball court, as part of their ServeCamp, and may have paid for certain items relating to the sand volleyball court, independently from the Township. These receipts would not be in my possession, custody or control.

8. The Penns Valley Youth Center rents space in the Old Gregg School, which is owned by the Township, but the Penns Valley Youth Center is not otherwise associated with the Township.

9. I hereby certify that the facts contained in the foregoing Attestation are true and correct to the best of my knowledge, information, and belief, and that I make this Attestation subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



Jennifer Snyder

Dated: November 14, 2018

BEFORE THE PENNSYLVANIA OFFICE OF OPEN RECORDS

IN THE MATTER OF:

MICHELLE GROVE,

Requester,

v.

GREGG TOWNSHIP,

Respondent.

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No. AP 2018-1972

CERTIFICATE OF SERVICE

I, David S. Gaines, Jr., hereby certify that a true and correct copy of this Response to Requester's Appeal was served via email to michelleyvonnegrove@gmail.com on this fourteenth day of November, 2018.


David S. Gaines, Jr.

Dated: November 14, 2018