

2015 APR -1 PM 2:01  
DEPT. OF CORRECTIONS  
PROBATIONARY  
CENTRE COUNTY, PA

**IN THE COURT OF COMMON PLEAS  
CENTRE COUNTY, PENNSYLVANIA**

1  
 2  
 3  
 4  
 5  
 6  
 7  
 8  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28  
 29  
 30  
 31  
 32  
 33  
 34  
 35  
 36  
 37  
 38  
 39  
 40  
 41  
 42  
 43  
 44  
 45  
 46  
 47  
 48  
 49  
 50  
 51  
 52  
 53  
 54  
 55  
 56  
 57  
 58  
 59  
 60  
 61  
 62  
 63  
 64  
 65  
 66  
 67  
 68  
 69  
 70  
 71  
 72  
 73  
 74  
 75  
 76  
 77  
 78  
 79  
 80  
 81  
 82  
 83  
 84  
 85  
 86  
 87  
 88  
 89  
 90  
 91  
 92  
 93  
 94  
 95  
 96  
 97  
 98  
 99  
 100  
 101  
 102  
 103  
 104  
 105  
 106  
 107  
 108  
 109  
 110  
 111  
 112  
 113  
 114  
 115  
 116  
 117  
 118  
 119  
 120  
 121  
 122  
 123  
 124  
 125  
 126  
 127  
 128  
 129  
 130  
 131  
 132  
 133  
 134  
 135  
 136  
 137  
 138  
 139  
 140  
 141  
 142  
 143  
 144  
 145  
 146  
 147  
 148  
 149  
 150  
 151  
 152  
 153  
 154  
 155  
 156  
 157  
 158  
 159  
 160  
 161  
 162  
 163  
 164  
 165  
 166  
 167  
 168  
 169  
 170  
 171  
 172  
 173  
 174  
 175  
 176  
 177  
 178  
 179  
 180  
 181  
 182  
 183  
 184  
 185  
 186  
 187  
 188  
 189  
 190  
 191  
 192  
 193  
 194  
 195  
 196  
 197  
 198  
 199  
 200  
 201  
 202  
 203  
 204  
 205  
 206  
 207  
 208  
 209  
 210  
 211  
 212  
 213  
 214  
 215  
 216  
 217  
 218  
 219  
 220  
 221  
 222  
 223  
 224  
 225  
 226  
 227  
 228  
 229  
 230  
 231  
 232  
 233  
 234  
 235  
 236  
 237  
 238  
 239  
 240  
 241  
 242  
 243  
 244  
 245  
 246  
 247  
 248  
 249  
 250  
 251  
 252  
 253  
 254  
 255  
 256  
 257  
 258  
 259  
 260  
 261  
 262  
 263  
 264  
 265  
 266  
 267  
 268  
 269  
 270  
 271  
 272  
 273  
 274  
 275  
 276  
 277  
 278  
 279  
 280  
 281  
 282  
 283  
 284  
 285  
 286  
 287  
 288  
 289  
 290  
 291  
 292  
 293  
 294  
 295  
 296  
 297  
 298  
 299  
 300  
 301  
 302  
 303  
 304  
 305  
 306  
 307  
 308  
 309  
 310  
 311  
 312  
 313  
 314  
 315  
 316  
 317  
 318  
 319  
 320  
 321  
 322  
 323  
 324  
 325  
 326  
 327  
 328  
 329  
 330  
 331  
 332  
 333  
 334  
 335  
 336  
 337  
 338  
 339  
 340  
 341  
 342  
 343  
 344  
 345  
 346  
 347  
 348  
 349  
 350  
 351  
 352  
 353  
 354  
 355  
 356  
 357  
 358  
 359  
 360  
 361  
 362  
 363  
 364  
 365  
 366  
 367  
 368  
 369  
 370  
 371  
 372  
 373  
 374  
 375  
 376  
 377  
 378  
 379  
 380  
 381  
 382  
 383  
 384  
 385  
 386  
 387  
 388  
 389  
 390  
 391  
 392  
 393  
 394  
 395  
 396  
 397  
 398  
 399  
 400  
 401  
 402  
 403  
 404  
 405  
 406  
 407  
 408  
 409  
 410  
 411  
 412  
 413  
 414  
 415  
 416  
 417  
 418  
 419  
 420  
 421  
 422  
 423  
 424  
 425  
 426  
 427  
 428  
 429  
 430  
 431  
 432  
 433  
 434  
 435  
 436  
 437  
 438  
 439  
 440  
 441  
 442  
 443  
 444  
 445  
 446  
 447  
 448  
 449  
 450  
 451  
 452  
 453  
 454  
 455  
 456  
 457  
 458  
 459  
 460  
 461  
 462  
 463  
 464  
 465  
 466  
 467  
 468  
 469  
 470  
 471  
 472  
 473  
 474  
 475  
 476  
 477  
 478  
 479  
 480  
 481  
 482  
 483  
 484  
 485  
 486  
 487  
 488  
 489  
 490  
 491  
 492  
 493  
 494  
 495  
 496  
 497  
 498  
 499  
 500  
 501  
 502  
 503  
 504  
 505  
 506  
 507  
 508  
 509  
 510  
 511  
 512  
 513  
 514  
 515  
 516  
 517  
 518  
 519  
 520  
 521  
 522  
 523  
 524  
 525

**No.: 2015-1080**

AND NOW come Defendants Theodore C. Tanski (“Tanski”) and The McShane Firm, LLC (collectively “Defendants”) by and through their attorneys of record Richard S. Roberts and Michael Antonio Giaramita Jr. of *The McShane Firm, LLC*, in response to

Plaintiff's Petition for Emergency Injunction and Preliminary Injunction, and in opposition to the same state as follows:

### INTRODUCTION

In Plaintiff's Motion for Preliminary Injunction, he asks this Court to prohibit "the Defendants from **disclosing any information** related to Judge Grine's telephone communications . . . ." *Plaintiff's Motion for Preliminary Injunction* p. 4-5. Accordingly, Plaintiff seeks an unconstitutional prior restraint in efforts to suppress speech which is protected by the First Amendment.

Prior restraints specifically include "court orders that actually forbid speech activities," which the United States Supreme Court has labeled a "classic example." *Alexander v. U.S.*, 509 U.S. 544, 550 (1993). As per the Supreme Court of the United States, it is "clear that the barriers to prior restraint remain high unless we are to abandon what this Court has said for nearly a quarter of our national existence and implied throughout all of it." *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539, 561 (1976). The Court has further deemed prior restraints on speech "the most serious and the least tolerable infringement on First Amendment rights." *Id.* at 559. Consequently, prior restraints bear a heavy presumption against constitutional validity. *New York Times Co. v. United States*, 403 U.S. 713, 718 (1971).

Throughout the history of the United States, only few have overcome this presumption. Reserved for the most extraordinary cases, the Court has refused this remedy in the face of competing constitutional interests or urgent issues of national security. *CBS, Inc. v. Davis*, 510 U.S. 1315, 1317 (1994) (citing *Nebraska Press Ass'n v.*

*Stuart*, 427 U.S. 539 (1976); *New York Times v. United States*, 403 U.S. 713 (1971)). President Richard Nixon was denied this remedy to prevent publication of the Pentagon Papers. *New York Times Co. v. United States*, 403 U.S. 713 (1971). More recently, First Amendment protections prevented President Obama from suppressing Wiki Leaks and Abu Grab.

Specifically, “privacy concerns give way when balanced against the interest in publishing matters of public importance” because “[t]he right of privacy does not prohibit any publication of matter which is of public or general interest.” *Bartnicki v. Vopper*, 532 U.S. 514, 534 (2001) (quoting *The Right to Privacy*, 4 Harv. L.Rev. 193, 214 (1890) (internal quotations omitted)). In *Bartnicki*, the Court reasoned that “[o]ne of the costs associated with participation in public affairs is an attendant loss of privacy.” *Bartnicki*, 532 U.S. at 534.

Furthermore, the presumption of unconstitutionality prevails over reputational interests of judges, or even the judiciary. In the words of the late Justice Frankfurter, “speech cannot be punished when the purpose is simply to protect the court as a mystical entity or the judges as individuals or as anointed priests set apart from the community and spared the criticism to which in a democracy other public servants are exposed.” *Landmark Commc’ns, Inc. v. Virginia*, 435 U.S. 829, 842 (1978) (quoting *Bridges v. California*, 314 U.S. 252, 291-92 (1941)).

Finally, the Court has refused to grant prior restraints even when information was unlawfully obtained by a third party, or obtained through “calculated misdeeds.” See *Bartnicki*, 532 U.S. at 530; *CBS, Inc. v. Davis*, 510 U.S. 1315, 1317 (1994).

In the matter at hand, Grine seeks an unprecedented remedy which has been consistently denied by the United States Supreme Court. He seeks a remedy denied to sitting Presidents with national security concerns, denied to sitting judges and the judiciary to protect esteem, and denied to public officials in the face of privacy interests.

Although Defendants maintain that the disclosure of records was proper, this has no bearing on this Court's decision. Whether the disclosure itself was proper under the Right-to-Know law is of no significance to Grine's claim against Defendants. Tanski lawfully obtained the records by submitting a Right-to-Know request in accordance with the procedures in place. Any alleged defect in the initial dissemination —however baseless— has no bearing on whether or not the Defendants can lawfully disclose the information lawfully in their possession. Furthermore, The McShane Firm did not obtain the records directly from Centre County, and is even further removed from any allegations of improper dissemination.

Although Tanski and The McShane Firm must prevail under First Amendment analysis, it is suggested that Defendants prevail under separate and distinct state grounds through Article 1 Section 7 of the Pennsylvania Constitution. Article 1 Section 7 predates the First Amendment and provides for stronger protection of speech. *Pap's A.M. v. City of Erie*, 571 Pa. 375 (2002). These protections have been particularly upheld with respect to matters of public concern.

In light of Defendants' protections under the First Amendment, this Court must deny Plaintiff's request for a prior restraint. As a result, Defendants respectfully request that this Court deny Plaintiff's Motion for Preliminary Injunction, and declare that

Defendants have the First Amendment Right to disclose the records in their possession free of any restrictions.

#### ANSWER

1. The allegations set forth in paragraph one are conclusions of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied.
2. Defendants admit that Plaintiff has simultaneously filed a Complaint in this Court. Defendants specifically deny any improper disclosure or violation of rights alleged by Plaintiff in this averment and in the Complaint. The right to file responsive pleadings to Plaintiff's Complaint is expressly reserved.
3. Defendants admit that Tanski submitted a Right-to-Know request to Centre County, and that Tanski is an attorney with The McShane Firm. Defendants deny that the request was submitted "in his capacity as an attorney with The McShane Firm." Tanski made his request as an individual. Tanski did not, nor was he required to disclose his purpose or motive in requesting access to the records. See 65 Pa.C.S. § 67.1308. Defendants specifically deny the relevance of Tanski's role as an attorney with The McShane Firm. Defendants admit that Tanski provided his office contact information on the Right-to-Know request to Centre County.
4. Admitted.
5. The allegations set forth in paragraph five are conclusions of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied.

6. The allegations set forth in paragraph six are conclusions of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied.
7. The allegations set forth in paragraph seven are conclusions of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied.
8. The allegations set forth in paragraph eight are conclusions of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied.
9. The allegations set forth in paragraph nine are denied as stated. Tanksi's request was limited solely to communications between specific public employees, specific telephone lines funded by the public, and a specific period of time. The records were produced directly to Tanski. Defendants specifically deny that any records were produced separately or directly to The McShane Firm. Defendants admit that the records displayed partial telephone numbers, but specifically deny requesting partial telephone numbers. Defendants specifically deny the relevance of the partial listing of telephone numbers as applied to Plaintiff's cause of action against Tanski or The McShane Firm.
10. After reasonable investigation, Defendants are without sufficient knowledge or information to form a belief as to the truth or falsity of the allegations set forth in Paragraph ten, and therefore deny the allegations thereof. Additionally,

Defendants specifically deny the relevance thereof. Strict proof will be demanded if the same is found to be material.

11. The allegations set forth in paragraph eleven are conclusions of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied. The records were produced directly to Tanski. Defendants specifically deny that any records were produced separately or directly to The McShane Firm. Defendants specifically deny that any records received were not subject to the Right to Know Law, and deny the relevance thereof.
12. The allegations set forth in paragraph twelve are conclusions of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied. To the extent that a response is required, Defendants specifically deny that any records were produced separately or directly to The McShane Firm. The records were produced directly to Attorney Tanski. Defendants specifically deny that any records received were improperly disclosed, and further deny the relevance thereof.
13. The allegations set forth in paragraph thirteen are conclusions of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied. To the extent that a response is required, Defendants specifically deny any improper disclosure or violation of rights alleged by Plaintiff in this averment. Defendants additionally deny the relevance thereof.
14. The allegations set forth in paragraph fourteen are a conclusion of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are

therefore denied. Defendants specifically deny that Plaintiff has a clear right to relief against either of them under the allegations set forth in Plaintiff's Motion or the Complaint. The right to file responsive pleadings to Plaintiff's Complaint is expressly reserved.

15. Paragraph fifteen requires neither an admission nor a denial. To the extent that a response is required, Defendants re-allege all previous denials as if stated in full.
16. The allegations set forth in paragraph sixteen are a conclusion of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied. Additionally, the relief requested constitutes a prior restraint in violation of the First Amendment of the United States Constitution and Article 1 Section 7 of the Pennsylvania Constitution. See *CBS, Inc. v. Davis*, 510 U.S. 1315; *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539; *Lawson v. Murray*, 515 U.S. 1110, 1113 (1995) (Scalia, J, Concurring); *Willing v. Mazzocone*, 482 Pa. 377 (1978).
17. The allegations set forth in paragraph seventeen are a conclusion of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied. Additionally, the relief requested constitutes a prior restraint in violation of the First Amendment of the United States Constitution and Article 1 Section 7 of the Pennsylvania Constitution. See *CBS, Inc. v. Davis*, 510 U.S. 1315; *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539; *Lawson v. Murray*, 515 U.S. 1110, 1113 (1995) (Scalia, J, Concurring); *Willing v. Mazzocone*, 482 Pa. 377 (1978).



18. The allegations set forth in paragraph eighteen are a conclusion of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied. To the extent that a response is required, Plaintiff's allegations are purely speculative, and are specifically denied. Defendants specifically deny any improper disclosure, or any relevance thereof. Additionally, the relief requested by Plaintiff constitutes a prior restraint in violation of the First Amendment of the United States Constitution and Article 1 Section 7 of the Pennsylvania Constitution. See *CBS, Inc. v. Davis*, 510 U.S. 1315; *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539; *Lawson v. Murray*, 515 U.S. 1110, 1113 (1995) (Scalia, J, Concurring); *Willing v. Mazzocone*, 482 Pa. 377 (1978).

19. The allegations set forth in paragraph nineteen are a conclusion of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are therefore denied. To the extent that a response is required, Plaintiff's allegations are purely speculative, and are specifically denied. Defendants specifically deny any improper disclosure, or any relevance thereof. Additionally, the relief requested by Plaintiff constitutes a prior restraint in violation of the First Amendment of the United States Constitution and Article 1 Section 7 of the Pennsylvania Constitution. See *CBS, Inc. v. Davis*, 510 U.S. 1315; *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539; *Lawson v. Murray*, 515 U.S. 1110, 1113 (1995) (Scalia, J, Concurring); *Willing v. Mazzocone*, 482 Pa. 377 (1978).

20. The allegations set forth in paragraph twenty are a conclusion of law to which no response is required under the Pennsylvania Rules of Civil Procedure, and are

therefore denied. To the extent that a response is required, Plaintiff's allegations are purely speculative, and are specifically denied. Defendants specifically deny any improper disclosure, or any relevance thereof. Additionally, the relief requested by Plaintiff constitutes a prior restraint in violation of the First Amendment of the United States Constitution and Article 1 Section 7 of the Pennsylvania Constitution. See *CBS, Inc. v. Davis*, 510 U.S. 1315; *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539; *Lawson v. Murray*, 515 U.S. 1110, 1113 (1995) (Scalia, J, Concurring); *Willing v. Mazzocone*, 482 Pa. 377 (1978).

21. Paragraph twenty-one requires neither an admission nor a denial. To the extent that a response is required, Defendants re-allege all previous denials as if stated in full.
22. Paragraph twenty-two requires neither an admission nor a denial. Plaintiff's Emergency Injunction was filed on March 16, 2015 at 1:31 PM, and was granted by a signed Order filed at 1:33 PM on March 16, 2015. Defendants further stipulated to abide by the terms of the Emergency Injunction through an Order filed on March 20, 2015. To the extent that a response is required, Defendants re-allege all previous denials as if stated in full.
23. Paragraph twenty-three requires neither an admission nor a denial. Plaintiff's Emergency Injunction was granted by a signed Order filed on March 16, 2015. Defendants further stipulated to abide by the terms of the Emergency Injunction through an Order filed on March 20, 2015. To the extent that a response is required, Defendants re-allege all previous denials as if stated in full.

24. Paragraph twenty-four requires neither an admission nor a denial. Plaintiff's Emergency Injunction was granted by a signed Order filed on March 16, 2015. Defendants further stipulated to abide by the terms of the Emergency Injunction through an Order filed on March 20, 2015. To the extent that a response is required, Defendants re-allege all previous denials as if stated in full.
25. Paragraph twenty-five requires neither an admission nor a denial. Plaintiff's Emergency Injunction was granted by a signed Order filed on March 16, 2015. Defendants further stipulated to abide by the terms of the Emergency Injunction through an Order filed on March 20, 2015. To the extent that a response is required, Defendants re-allege all previous denials as if stated in full.
26. Paragraph twenty-six requires neither an admission nor a denial. Plaintiff's Emergency Injunction was granted by a signed Order filed on March 16, 2015. Defendants further stipulated to abide by the terms of the Emergency Injunction through an Order filed on March 20, 2015. To the extent that a response is required, Defendants re-allege all previous denials as if stated in full.

#### **NEW MATTER**

27. Plaintiff's claims are barred by privileges afforded under the United States Constitution and the Pennsylvania Constitution.
28. Plaintiff's claims are barred by equitable estoppel.
29. Plaintiff's claims are barred by unclean hands.

30. The relief requested by Plaintiff is a prior restraint which violates the First Amendment of the United States Constitution and Article 1 Section 7 of the Pennsylvania Constitution. See *CBS, Inc. v. Davis*, 510 U.S. 1315 (1994); *Nebraska Press Ass'n v. Stuart*, 427 U.S. 539 (1976); *Lawson v. Murray*, 515 U.S. 1110, 1113 (1995) (Scalia, J, Concurring); *Willing v. Mazzone*, 482 Pa. 377 (1978).
31. The records constitute a matter of public concern, dissemination and publication of which is protected by the First Amendment of the United States Constitution and Article 1 Section 7 of the Pennsylvania Constitution. See *Landmark Commc'ns, Inc. v. Virginia*, 435 U.S. 829 (1978); *Smith v. Daily Mail Publishing Co.*, 443 U.S. 97 (1979); *Bartnicki v. Vopper*, 532 U.S. 514 (2001).
32. Defendants obtained the records lawfully, regardless of the status of disclosure. See *Bartnicki v. Vopper*, 532 U.S. 514 (2001).
33. Plaintiff cannot prevent publication or dissemination of the records, even if obtained through "calculated misdeeds." See *CBS, Inc. v. Davis*, 510 U.S. 1315 (1994).
34. Publication or dissemination of the records constitutes protected speech of the First Amendment of the United States Constitution and Article 1 Section 7 of the Pennsylvania Constitution.
35. The relief Plaintiff seeks violates Defendants' freedom of expression under the First Amendment of the United States Constitution and Article 1 Section 7 of the Pennsylvania Constitution.

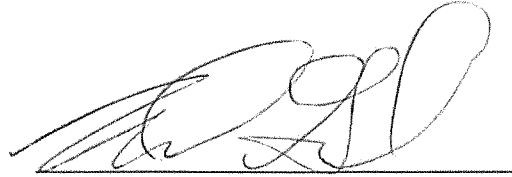
36. Separate and distinct from federal protections, publication or dissemination of the records is protected under Article 1 Section 7 of the Pennsylvania Constitution.

37. The relief Plaintiff seeks constitutes a prior restraint forbidden under Article I § 7 of the Pennsylvania Constitution. See *William Goldman Theatres, Inc. v. Dana*, 405 Pa. 83 (1961); *Willing v. Mazzone*, 482 Pa. 377 (1978).

WHEREFORE, for the reasons set forth above, Defendants Theodore C. Tanski and The McShane Firm, LLC, respectfully request that this Court deny Plaintiff's Petition for Preliminary Injunction in total.

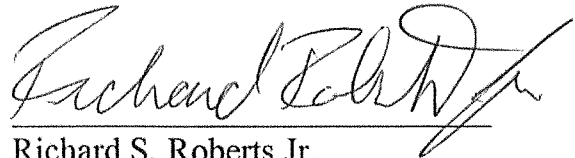
Respectfully submitted,

Date: 4/1/2015



Michael Antonio Giaramita Jr.  
THE MCSHANE FIRM, LLC  
3601 Vartan Way, 2nd Floor  
Harrisburg, Pennsylvania 17110  
P: (717) 657-3900  
F: (717) 657-2060  
MGIARAMITA@THEMCSHANEFIRM.COM

Date: 4/1/2015

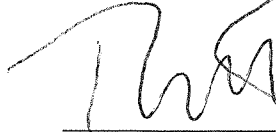


Richard S. Roberts Jr.  
THE MCSHANE FIRM, LLC  
3601 Vartan Way, 2nd Floor  
Harrisburg, Pennsylvania 17110  
P: (717) 657-3900  
F: (717) 657-2060  
RROBERTS@THEMCSHANEFIRM.COM

VERIFICATION

Theodore C. Tanski deposes and states that the facts set forth in the foregoing Answer to Plaintiff's Motion for Preliminary Injunction are true and correct to the best of his knowledge, information and belief. This Verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 4-1-15

A handwritten signature in black ink, appearing to be 'Tanski', written over a horizontal line.

Theodore C. Tanski

VERIFICATION

Attorney Richard S. Roberts deposes and states that he is an attorney of record for The McShane Firm, LLC, and in that capacity is authorized on behalf of The McShane Firm, LLC to make this Verification. The contents of the foregoing instrument have been reviewed by Justin J, McShane, Esq., CEO of The McShane Firm, LLC, and the facts set forth in the foregoing Answer to Plaintiff's Motion for Preliminary Injunction are true and correct to the best of his knowledge, information and belief. This Verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 4/11/2015

A handwritten signature in cursive script, appearing to read "Richard S. Roberts", written over a horizontal line.

Richard S. Roberts for The McShane Firm, LLC



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1<sup>st</sup> day of APRIL, 2015  
a true and correct copy of the above instrument was sent by electronic mail United  
States mail, postage prepaid, addressed to all known counsel of record, listed below.

Kimberly M. Colonna  
Kathleen Duffy Bruder  
McNEES WALLACE & NURICK LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
*Attorneys for Jonathan D. Grine*

Mary Lou Maierhofer  
MARGOLIS EDELSTEIN  
P.O. Box 628  
Hollidaysburg, PA 16648-9998  
*Attorney for County of Centre*

Date: 4/1/2015



Michael Antonio Giaramita Jr.  
THE MCSHANE FIRM, LLC  
3601 Vartan Way, 2nd Floor  
Harrisburg, Pennsylvania 17110  
P: (717) 657-3900  
F: (717) 657-2060

Date: 4/1/2015



Richard S. Roberts Jr.  
THE MCSHANE FIRM, LLC  
3601 Vartan Way, 2nd Floor  
Harrisburg, Pennsylvania 17110  
P: (717) 657-3900  
F: (717) 657-2060