

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

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No. 710 C.D. 2022

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PENNSYLVANIA STATE POLICE,  
Petitioner

v.

CARTER WALKER AND LNP MEDIA GROUP, INC.,  
(OFFICE OF OPEN RECORDS),  
Respondent.

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Appeal from the Final Determination dated June 9, 2022 of the Pennsylvania  
Office of Open Records to Docket Number AP 2022-0712

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BRIEF OF THE PETITIONER  
PENNSYLVANIA STATE POLICE

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## **STATEMENT OF JURISDICTION**

This Honorable Court has jurisdiction over the appeal taken from the June 9, 2022, Final Determination of the Office of Open Records (“OOR”) in the matter of *Carter Walker and LNP Media Group, Inc. v. Pennsylvania State Police*, OOR Docket No. AP 2022-0712 (Consolidated appeal of OOR Dkt. Nos. AP 2022-0712, 2022-0713), pursuant to 65 P.S. § 67.1301(a) of the Right-to-Know Law and 42 Pa. C.S. § 763(a)(2) of the Judicial Code.

## **STATEMENT OF QUESTIONS INVOLVED**

1. **QUESTION:** Whether the Office of Open Records (OOR) erred when it determined that PSP could not charge Requester for the costs necessarily incurred to comply with the request?

**SUGGESTED ANSWER:** Yes

## STATEMENT OF THE CASE

This matter arises in the form an appeal of the Pennsylvania Office of Open Records (OOR) Final Determination at Docket Number AP 2022-0712, dated June 9, 2022, issued by Appeals Officer Kathleen Higgins, Esquire.

On January 14, 2022, the Pennsylvania State Police (PSP) received a Right-to-Know Law (RTKL) Request PSP/RTK 2022-0085 from Respondent Carter Walker and LNP Media Group, Inc. (collectively referred to as “Requester”) wherein he sought: for January 1, 1997 to December 31, 2021, the underlying data set which is used to create the Hate Crime Report search function on the Uniform Crime Reporting website, as well as any data dictionary, code tables, or other manuals that define the meaning of the column headers in the data or acronyms.(Final Determination at 1); (R.R1a – R6a). Requester, in the alternative to the dataset, sought: Act 180 of 2004, section 504(a) requires that all law enforcement agencies report information on hate crimes to the PSP on a monthly basis. In the alternative, I would request all of these reports for [Jan. 1, 1997, to Dec. 31, 2021]. (R.R3a).

By letter dated January 21, 2022, Requester was notified in accordance with RTKL section 67.902(b) that Petitioner required an additional thirty days to prepare its final response to their request. (R.R.8a) An extension for the Petitioner to provide a response was granted by the requester. (R.R.21a). On March 2, 2022, the Petitioner

denied PSP/RTK 2022-0085, informing Requester that obtaining the requested dataset to fulfill the Request would cost the Petitioner approximately \$6,000 in labor costs to a third-party vendor to obtain the requested dataset. (R.R.25a). On March 23, 2022, the Requester appealed the Agency's final response to the OOR. (R.R.45a). On June 9, 2022, OOR Appeals Officer Kathleen Higgins, Esq. issued a final determination granting the Requester's appeal and finding the Petitioner had not demonstrated the Agency would be required to create a record that does not currently exist and that the Agency may not require the Requester to pay the \$6,000 cost to acquire the requested records from the third-party vendor who receives and collates the computer data records in order to compile the same and produce humanly cognizable data that may then be formatted in a manner to populate the Uniform Crime Reporting report.

On July 11, 2022, Petitioner filed its Petition for Review contesting the final determination, now before this Court.

## SUMMARY OF ARGUMENT

This appeal concerns whether an Agency may charge a Requester with the cost associated to produce requested responsive records where the responsive records are maintained in a complex, consistently updated, database. Specifically, in this case, the Requester seeks the *underlying dataset* for Hate Crime Reports generated by the Pennsylvania Uniform Crime Reporting Program (PAUCR) – a public facing, public reporting, web-based statistical data tool.

The OOR erred in determining the PSP could not charge the Requester for costs associated with producing records responsive to the request where the effort required to provide records necessitates the Agency’s software provider (Optimum Technology “OTECH”) to leverage binary data from the PAUCR database and process the same to produce humanly cognizable information. Essentially, a new record must be created from the database. Unlike a simple spreadsheet, where data collected is readily available, the complex nature of the PAUCR database requires third-party software to produce readable data.

In this case, the software provider’s estimated labor effort to facilitate the Agency’s fulfillment of this request is approximately 50-60 hours at a cost of \$6,000. Therefore, the cost to provide these records is necessarily incurred as a result of complying with a request. The Right-to-Know law allows an agency to assess

necessarily incurred fees on to a Requester provided they are reasonable and here such costs are reasonable.

## ARGUMENT

### **I. THE OFFICE OF OPEN RECORDS ERRED WHEN IT DETERMINED THAT PSP COULD NOT CHARGE REQUESTER WITH THE COST ASSOCIATED WITH PRODUCING RECORDS RESPONSIVE TO THE REQUEST.**

In the request, the Requester sought the “*underlying dataset* which is used to create the ‘Hate Crime Report’ search function on the Uniform Crime Reporting website....” (emphasis added). (R.R. 1a). As background, the Uniform Crime Reporting website is a public facing website maintained through the statutory responsibilities placed on the PSP by the Uniform Crime Reporting Act, 18 P.S. §§ 20.501 – 20.509 (“Act”). The Act authorizes the PSP to collect and gather information on crime and make annual reports. 18 P.S. § 20.505; 18 P.S. § 20.506. The Act requires the PSP to collate, format, and compile statistics received by contributing law enforcement agencies across the Commonwealth as the PSP “deem[s] necessary to present a proper depiction of the nature and volume of crime within this Commonwealth.” 18 P.S. § 20.505. The Pennsylvania Uniform Crime Reporting (“PA UCR”) Program provides Statewide information on crime trends and volume based on the reporting and statistics provided to PSP. *Id.* This includes the “Hate Crime Report.” Pennsylvania State Police, *Hate Crime Report*, Reports: Summary Reports, <https://www.ucr.pa.gov/PAUCRSPUBLIC/Report/HateCrime>. The hate crime reports capture summarized information about hate crime

submissions from self-reporting agencies across the Commonwealth. Pennsylvania State Police, *Hate Crime Report*, Reports: Summary Reports, <https://www.ucr.pa.gov/PAUCRSPUBLIC/ReportsIndex/List>. More specifically, the reports capture (1) incident count; (2) monthly incident summary; (3) details of bias nature; (4) details of offense; (5) details of location; (6) details of victim type; (7) details of offender race; (8) victim offender count; (9) victim types summary; (10) location summary; (11) offense summary; (12) offender race summary; and (13) bias summary. *Supra*.

The PA UCR System (PAUCRS) is a web-based data collection and dissemination system used to facilitate operation of the PA UCR program. (R.R.104a). The PAUCR System (“PAUCRS”) is a web-based data collection and dissemination system (aka database) used to facilitate operation of the PA UCR program. (R.R.104a). PAUCRS collects both United States Department of Justice, FBI Summary Reporting System (“SRS”) and National Incident-Based Reporting System (“NIBRS”) submissions from all law enforcement agencies in Pennsylvania. (R.R. 93a) In order to facilitate the gathering of this information, participating law enforcement agencies upload the required statistical information as a flat file via the internet user interface – PAUCRS. (R.R.95a) PAUCRS is also responsible for submitting Pennsylvania’s UCR data each month to the FBI’s UCR Program. (R.R.93a) In 2017, the PSP was awarded grant funding by the US DOJ’s Bureau of

Justice Statistics to expand the state's capacity to collect and report SRS data to include collection and reporting of incident-based crime data to NIBRS. (R.R.93a)

To assist PSP with implementation of the program, the Commonwealth of Pennsylvania, acting through the PSP, contracted with Optimum Technology, Inc. ("OTECH") to provide a database processing and management system of the PAUCRS data housed on PSP servers. (R.R.221a). In other words, PSP maintains the hardware and OTECH maintains the Software<sup>1</sup>. (R.R.106a). Accordingly, through this contract, the PSP has licensed, OTECH's proprietary software or products containing embedded or pre-loaded proprietary software, or both, via their software product called "SWIFTREPOSITORY" / "SUMMARY REPORTING SYSTEM" "GIS CRIME MAPPING." (R.R.166a). OTECH administers all technical support related to the functionality of the database processing and management system software. (R.R.167a). In other words, OTECH retains development stage access of the data housed on PSP's servers. (R.R.93a – R.94a) This level of access is software administrative access to which OTECH, solely, maintains. (R.R.94a) Instead, the PSP maintains administrative access. (R.R.94a) Such access does not provide an avenue for the PSP to acquire the underlying dataset

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<sup>1</sup> Software is defined by the referenced contract as "A collection of one or more programs, databases or microprograms fixed in any tangible medium of expression that comprises a sequence of instructions (source code) to carry out a process in, or convertible into, a form executable by an electronic computer (object code)." (R.R. 111a).

Requester seeks. (R.R. 221a-222a.) Instead, the PSP’s administrative access allows the agency to view the aggregate data as processed by the PAUCRS interface. To clarify, the report available to the public vs. the report available to the PSP is the substantively the same in each environment. (R.R.94a)

The “SWIFTREPOSITORY” / “SUMMARY REPORTING SYSTEM” “GIS CRIME MAPPING” software collects the flat file data uploads<sup>2</sup> submitted by the Commonwealth’s law enforcement agencies. (R.R.95a) Flat file data uploads are available to the agency in binary format; the PAUCR interface (using OTECH software) translates and arranges the same into a cognizable (*i.e.* human readable) format accessible to the public online at: <https://www.ucr.pa.gov/PAUCRSPUBLIC/Home/Index>. (R.R.95a)

This index is searchable by year, agency, county, offenses, property, arrests, and hate crime. Pennsylvania State Police, *Hate Crime Report*, Reports: Summary Reports, <https://www.ucr.pa.gov/PAUCRSPUBLIC/Report/HateCrime>. This indexed report is the way the PSP may access, and review collected data. R.R.95a

**A. The cost for providing records responsive to the request is \$6,000 and PSP is permitted to charge requester this fee.**

The Requester seeks the “underlying dataset” used to generate the Hate Crime Report and, as explained above, for PSP to provide the Requester with these records

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<sup>2</sup> These would be the “reports” identified by Requester in his Request in the Alternative.

it would require a labor cost of approximately 50 – 60 hours by OTECH employees at an estimated cost of approximately \$6,000. (R.R. 104a; R.R. 222a). In its Final Determination, the Office of Open Records determined that “PSP may not require the Requester to pay labor costs associated with complying with the request.” (Final Determination at 9). However, this determination by the OOR is erroneous.

Section 1307 of the RTKL sets forth the limitation on fees that an agency may impose upon a Requester when complying with request. (65 P.S. §67.1307). Section 1307 provides, in relevant part, the following:

**§ 67.1307. Fee limitations**

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(b) Duplication.—

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(4) The following apply to complex and extensive data sets, including geographic information systems or integrated property assessment lists.

(i) Fees for copying may be based on the reasonable market value of the same or closely related data sets.

(ii) Subparagraph (i) shall not apply to:

(A) a request by an individual employed by or connected with a newspaper or magazine of general circulation, weekly publication, press association or radio or television station, for the purpose of obtaining information for publication or broadcast; or

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(f) Waiver of fees.--An agency may waive the fees for duplication of a record, including, but not limited to, when:

(1) the requester duplicates the record; or

(2) the agency deems it is in the public interest to do so.

(g) Limitations.--Except as otherwise provided by statute, no other fees may be imposed unless the agency necessarily incurs costs for complying with the request, and such fees must be reasonable. No fee may be imposed for an agency's review of a record to determine whether the record is a public record, legislative record or financial record subject to access in accordance with this act.

(h) Prepayment.--Prior to granting a request for access in accordance with this act, an agency may require a requester to prepay an estimate of the fees authorized under this section if the fees required to fulfill the request are expected to exceed \$100.

(65 P.S. §67.1307) (emphasis added).

With respect to Section 1307 and its application to request, the OOR stated that:

Section 1307 of the RTKL states that except for fees expressly provided for in the RTKL or other statutes, “no other fees may be imposed unless the agency necessarily incurs costs for complying with the request.” *See* 65 P.S. § 67.1307(g). The Commonwealth Court has held that “the RTKL does not expressly authorize the charging of labor costs” and that agencies are “not permitted to charge a fee for such costs.” *State Employees’ Ret. Sys. v. Office of Open Records*, 10 A.3d 358, 363 (Pa. Commw. Ct. 2010). Therefore, the PSP cannot require the Requester to pay labor fees, regardless of whether the fees are for third party labor, as such fees are not authorized by the RTKL, nor can the OOR order the Requester to pay labor costs in order to receive access to public records. To find otherwise would encourage an agency to avoid disclosing public records by storing records in a third-party database and charging excessive data retrieval fees.

(Final Determination at 9-10). However, this analysis does not comport with the statutory language or this Court’s decision in *State Employees Retirement System*.

In *State Employees Retirement System v. Office of Open Records*, the court reviewed the question of whether SERS could charge the Requester with the “labor costs” associated with producing the responsive records. The Court described the background of that case as follows:

On November 19, 2009, Requestors submitted a RTKL request to SERS seeking the years of service, class of service and total compensation for the last three years of service for the employees' they had listed. The Requestors asked that they be notified if the cost to fulfill the request would exceed \$50.00.

On November 20, 2009, via telephone, SERS advised the Requestors that the cost to fulfill the Request would be \$77.00. The Requestors asked that SERS take no further action to provide the information. The Requestors then asked SERS to reconsider its position on the fee and if it would not, to prepare a formal response so that Requestors could file an appeal.

On November 30, 2009, Robert Gentzel, Agency Open Records Officer for SERS, sent Requestors a letter advising that SERS was prepared to fulfill the request without requiring pre-payment, but stated that they would send a bill with the response.

*State Employees' Ret. Sys. v. Off. of Open Recs.*, 10 A.3d 358, 359 (Pa. Cmwlth. 2010). The Requester appealed the imposition of the fee to the OOR. In its Final Determination, the OOR observed that SERS compiled the records it provided to the Requester in manner that was not required by section 705 of the RTKL and held that SERS was not permitted to charge Requester for labor costs. SERS appealed to this Honorable Court arguing, among other things that “Section 1307(g) of the RTKL permits SERS to charge a reasonable fee for labor costs it necessarily incurs for

complying with the RTKL request.” After reviewing SERS evidence that the labor costs were “necessarily incurred”, this Court held that “[t]he OOR was correct in determining that SERS cannot charge for creating a record it was not required to create. Further, SERS’ creation of such a record was not ‘necessarily’ incurred, as it was not ‘necessary’ for SERS to create such record.” *Id.* at 363.<sup>3</sup>

Thus, *State Employees Retirement System* does not stand for the proposition that “the RTKL does not expressly authorize the charging of labor costs and that agencies are not permitted to charge a fee for such costs,” as the OOR contends in its Final Determination, rather *State Employees Retirement System* simply sets forth the requirement that there must be sufficient evidence that any fee to comply with a request must be “necessarily incurred.” 65 P.S. 67.1307(g).

With respect to whether the fees are necessarily incurred, PSP submitted the Affidavit of its Agency Open Record Officer (AORO), William A. Rozier. J.D. AORO stated, in relevant part:

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<sup>3</sup> A review of the case indicates that SERS took various separate, existent records and paid two employees to collate the responsive information into a “single page spread sheet containing only the records that Requestors wanted and nothing else”, rather than the separate records that could have been produced at the time of the request, albeit in a “cumbersome, much less convenient format”. *Id.* at 362-363.

7. The PSP Bureau of Research and Development (“BRD”) administers the Pennsylvania Uniform Crime Reporting System (“PAUCRS”). This database provides Statewide information on crime trends and volume based on the reporting and statistics by law enforcement agencies throughout the Commonwealth. This database is available to the public.

8. In order to facilitate the data processing and data management of the PAUCRS, the Commonwealth, acting through the PSP, contracted with Optimum Technology, Inc. (“OTECH”) to provide the underlying database processing and database management (aka “system”) software and all technical support related to the functionality of the system software to support PAUCRS.

9. Upon receipt of this request, the PSP RTKL Unit contacted PSP BRD personnel regarding records responsive to the instant request. PSP BRD identified that the request was for a data element-level breakdown of Hate Crime Incidents as far more granular than what was available administratively to the agency in the System or Public Portal. PSP BRD contacted OTECH with the request and asked for an estimate of cost to pull the raw data-set responsive to this request. OTECH responded to PSP BRD with the estimated labor effort of 50 to 60 hours at a cost of approximately \$6000 for a one-time PA SRS Hate Crime data pull.

(R.R. 104a). Additionally, PSP provided an Affidavit from Joshua Kembel, an Administrative Officer in PSP’s Bureau of Research and Development who confirmed the estimated cost with OTECH. (R.R. 222a). Thus, PSP has provided sufficient evidence demonstrating that the cost is necessarily incurred and may impose such a fee on the Requester. Moreover, because the fee is estimated to be more than \$100, PSP is permitted to seek pre-payment of the fee. 65 P.S. § 67.1307(h).

Finally, the provision found in Section 1307(b)(4)(ii)(A) is inapplicable here.

1307(b)(4) states, in relevant part:

**(4) The following apply to complex and extensive data sets, including geographic information systems or integrated property assessment lists.**

- (i) Fees for copying may be based on the reasonable market value of the same or closely related data sets.
- (ii) Subparagraph (i) shall not apply to:
  - (A) a request by an individual employed by or connected with a newspaper or magazine of general circulation, weekly publication, press association or radio or television station, for the purpose of obtaining information for publication or broadcast; or**

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65 P.S. §67.1307(b)(4).

With respect to whether Section 1307(b)(4)(ii)(A) is applicable we must first turn to the Request itself. The request sought “the *underlying data set* which is used to create the Hate Crime Report search function on the Uniform Crime Reporting website, as well as any data dictionary, code tables, or other manuals that define the meaning of the column headers in the data or acronyms.” (Final Determination at 1.) *See also*, (R.R. 1a). Taking the clear language of the request it is evident that the Requester is not seeking a data set such as the Hate Crime Report; rather the Requester is seeking records and information that is used to create the data sets. (R.R. 1a – R.R. 2a).

The RTKL does not define “data sets,” however, the use of the term in cases where courts have evaluated data sets indicates that it does not include records used “to create the Hate Crime Report search function on the Uniform Crime Reporting website.” *See, e.g. Carter v. Chapman*, 270 A.3d 444, 473 (Pa.), *cert. denied sub nom. Costello v. Carter*, 143 S. Ct. 102 (2022) (“the data sets used to calculate the

metric and, in some cases, the methodologies within the designated partisan fairness tests differed among the parties' experts."); *Reading Sch. Dist. v. I-Lead Charter Sch.*, 206 A.3d 27, 50 (Pa. Cmwlth. 2019)("nothing in CAB's decision suggests to me that it disregarded any particular test score or data set in making that decision.").

Additionally, the courts' use of the term as a compilation of statistical information in other cases is supported by statutory languages in Section 1307(b)(4) as well. First, from the statutory language the Section 1307(b)(4) considers geographic information systems and integrated property assessment lists are included in the definition of "complex and extensive data sets." These items are distinguishably different from records used to create the Hate Crime Report search function and do not require "data dictionary[s], code tables, or other manuals that define the meaning of the column headers in the data or acronyms" to interpret what is being provided pursuant to the request. Moreover, because Section 1307(b)(4)(i) discusses a fee for copying, the statutory language presumes a completed data set is what is being provided to the Requester.

Finally, *assuming arguendo*, that the responsive records are considered data sets, Section 1307(b)(4)(i)(A) only waives the fee if a request by an individual employed by or connected with a newspaper is made for the purpose of obtaining information for publication or broadcast. Here, there is no evidence that "the *underlying data set* which is used to create the Hate Crime Report search function

on the Uniform Crime Reporting website, as well as any data dictionary, code tables, or other manuals that define the meaning of the column headers in the data or acronyms” will be publicized or broadcast. Additionally, PSP submits that this specific information published in the format as requested and provided to the Requester would not be understandable to any general audience that the Requester may have.

In sum, the granular level data pull and/or the alternative sought by this Request<sup>4</sup> involves a labor cost of approximately 50 – 60 hours by OTECH employees at an estimated cost of approximately \$6,000 and PSP has provided sufficient evidence that this cost is necessarily incurred to comply with the request.<sup>5</sup> (R.R. 104a – 105a; R.R. 221a – 222a; R.R. 95a).

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<sup>4</sup> This request is clear in that it seeks raw data and does not seek the aggregated data maintained or received by the PSP, therefore, the PSP is not limited to argument under §708(d).

<sup>5</sup> On 2/8/2022 the PSP RTKL office emailed Requester stating, “The information you are requesting is not part of the contract with PSP: therefore, the estimated cost for a one-time extraction for the data would be \$6,000. Please let me know how you would like to proceed with this RTK request.” Requester asserts this to be an impermissible assessment of fees. This was not an assessment of fees as contemplated in §1307(b), rather this was the cost to extract and compile the data as requested. §1307(e) allows an agency to establish user fees specifically for the provision of enhanced electronic access in addition to making the records accessible for inspection and duplication by a requester as required by this act. Such fees may be upon a per-transaction fee (among other methods) and may not be established with the intent or effect of excluding persons from access to records or creating a profit for the agency. This cost assessment is the amount charged for labor by OTECH to generate the requested information.

**CONCLUSION**

Wherefore, Respondent respectfully requests this Court reverse the Office of Open Records Final Determination in the matter of *Walker and LNP Media Group v. Pennsylvania State Police*, OOR Docket No. AP 2022-0712.

**Respectfully Submitted,**

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