

Supreme Court of Pennsylvania

Court of Common Pleas Civil Cover Sheet

Dauphin

County

Dauphin County Prothonotary E-Filed - 08 Oct 2025 02:58:56 PM
Case Number: 2025-CV-07648

For Prothonotary Use Only:

Docket No:

TIME STAMP

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

Commencement of Action:

- ☐ Complaint ☐ Writ of Summons ☐ Petition
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name:

Bret Pallotto

Lead Defendant's Name:

Pennsylvania State Police

Are money damages requested? ☐ Yes ☐ No

Dollar Amount Requested: ☐ within arbitration limits
(check one) ☐ outside arbitration limits

Is this a *Class Action Suit*? ☐ Yes ☐ No

Is this an *MDJ Appeal*? ☐ Yes ☐ No

Name of Plaintiff/Appellant's Attorney: Paula Knudsen Burke

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

SECTION B

Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☐ Other:

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other:

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional:

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other

☐ Employment Dispute:
Discrimination
☐ Employment Dispute: Other

☐ Other:

REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other:

CIVIL APPEALS

- Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other
Act 22

☐ Zoning Board
☐ Other:

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations
Restraining Order
☐ Quo Warranto
☐ Replevin
☐ Other:

Paula Knudsen Burke
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
PA ID: 87607
PO Box 1328
Lancaster, PA 17608
(717) 370-6884
pknudsen@rcfp.org

**IN THE DAUPHIN COUNTY COURT OF COMMON PLEAS
CIVIL DIVISION**

**BRET PALLOTTO and
CENTRE DAILY TIMES,**

Petitioners,

v.

PENNSYLVANIA STATE POLICE,

Respondent.

Docket No. _____

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

DAUPHIN COUNTY LAWYER REFERRAL SERVICE

213 North Front Street
Harrisburg, PA 17101
(717) 232-7536

NOTICE
CONCERNING MEDIATION OF ACTIONS PENDING BEFORE THE COURT OF
COMMON PLEAS OF DAUPHIN COUNTY

The Judges of the Court of Common Pleas of Dauphin County believe that mediation of lawsuits is a very important component of dispute resolution. Virtually all lawsuits can benefit in some manner from mediation. The Court has adopted Dauphin County Local Rule 1001 to encourage the use of mediation. This early alert enables litigants to determine the best time during the life of their lawsuit for a mediation session. The intent of this early alert is to help the parties act upon the requirement to consider good faith mediation at the optimal time.

The Dauphin County Bar Association provides mediation services and can be reached at 717-232-7536. Free mediation sessions for pro bono cases referred by MidPenn Legal Services are available through the DCBA.

**IN THE DAUPHIN COUNTY COURT OF COMMON PLEAS
CIVIL DIVISION**

**BRET PALLOTTO and
CENTRE DAILY TIMES,**

Petitioners,

v.

PENNSYLVANIA STATE POLICE,

Respondent.

Docket No.

PETITION FOR REVIEW

Petitioners Bret Pallotto and the Centre Daily Times (“CDT”) hereby file this Petition for Review under Act 22 of 2017, 42 Pa.C.S. §§ 67A01 *et seq.* (“Act 22”), which permits any member of the public and the press to request video and audio recordings created by law enforcement agencies and further allows a right of appeal in the event access is denied. In support of their appeal, Petitioners aver as follows:

PARTIES

1. Petitioner Bret Pallotto is an adult individual who is employed as CDT’s crimes and court reporter. His business address is 221 W. High Street, Suite 1300, Bellefonte, PA 16823.
2. The Centre Daily Times is a print and online news outlet covering Centre County. Its business address is 221 W. High Street, Suite 1300, Bellefonte, PA 16823.
3. Respondent Pennsylvania State Police (“PSP”) is the entity that denied Petitioner’s request for body-worn camera footage per 42 Pa.C.S. § 67A06(a)(2). Respondent’s headquarters are located at 1800 Elmerton Avenue, Harrisburg, PA 17110.

JURISDICTION

4. Respondent is a state agency located within Dauphin County; the request denial came from an office based in Dauphin County; therefore, the Court has jurisdiction over this matter. *See* 42 Pa.C.S. § 67A06(a)(1) (providing right of appeal to court of common pleas).

STATEMENT OF FACTS

5. On August 19, 2025, U.S. Immigration and Customs Enforcement (“ICE”) conducted an immigration enforcement action on Interstate 99 near Bellefonte, Centre County, PA. *See* Bret Pallotto, *26 Workers Detained by ICE in Centre County advocacy groups say. What we know*, Centre Daily Times (August 22, 2025), <https://www.centredaily.com/news/local/community/article311779674.html>.

6. Respondent has acknowledged that troopers employed by PSP were present at the time that ICE was detaining individuals on August 19, 2025. *Id.*; *see also* Bret Pallotto, *ICE confirms 24 arrests on highway in Centre County, though questions remain*, Centre Daily Times (August 28, 2025), <https://www.centredaily.com/news/local/community/article311848252.html>; Bret Pallotto, *‘Silence and secrecy.’ PA lawmaker raises concerns about ICE arrests in Centre County*, Centre Daily Times (August 28, 2025), <https://www.centredaily.com/news/local/community/article311888204.html>.

7. Bret Pallotto is a reporter covering courts and crime for the Centre Daily Times. Mr. Pallotto has been the primary reporter covering the August 19, 2025, ICE immigration enforcement action.

8. On August 29, 2025, Mr. Pallotto sent to PSP via certified mail a request pursuant to 42 Pa.C.S. §§ 67A01 *et seq.* seeking PSP troopers’ body camera footage capturing the August

19, 2025, immigration enforcement action incident. *See* Request and Declaration of Bret Pallotto (attached and incorporated herein as **Exhibit A**).

9. On September 8, 2025, PSP issued a written denial of Mr. Pallotto’s Act 22 request. *See* September 8, 2025, PSP Letter (attached and incorporated herein as **Exhibit B**). The denial letter, signed by William A. Rozier, J.D., the Agency Open Records Officer, stated that the recordings sought by Mr. Pallotto’s Act 22 request “is not an audio/video recording made by or associated with an incident [sic] investigated by Pennsylvania State Police. You may seek information on obtaining audio/video recordings by contacting ICE.” *Id.*

10. The letter contained no further bases of denial and no instructions for appeal. *Id.*

ARGUMENT

11. Petitioners incorporate by reference paragraphs 1–10 as if fully set forth herein.

12. Act 22 provides a statutory right of access by which the public may request and review police body camera footage to foster accountability and public trust in law enforcement. *See generally* 42 Pa.C.S. §§ 67A01 *et seq.*; *see also* Press Release, Commonwealth of Pa., *The Shapiro Administration Announces Pennsylvania Capitol Police Fully Implement Body Camera Technology* (Mar. 13, 2023), <https://perma.cc/E8VA-3HF4> (discussing how body cameras “add[] another layer of transparency, accountability, and safety for both the public and our officers”); Press Release, Governor Tom Wolf, *Wolf Administration Receives Federal Grant for State Police Body-Worn Camera Pilot Program* (July 7, 2017), <https://perma.cc/982V-UCC9> (“[B]ody-worn cameras strengthen police accountability, prevent confrontational situations, and improve evidence documentation.”); Pa. S. Legis. J., 201st Gen. Assemb., at 461 (May 9, 2017), <https://perma.cc/99TE-HBT9> (“[W]e want to become more open and transparent with respect to body cameras as we move forward.”) (statement of Senator Jay Costa); Press Release, Pa. State

Police, *PSP Completes Rollout of Body-Worn Cameras Ahead of Schedule* (Apr. 10, 2025), <https://www.pa.gov/agencies/psp/newsroom/psp-completes-rollout-of-body-worn-cameras-ahead-of-schedule> (“As the rollout of body cameras comes to completion, I’m thrilled we will see improved transparency with exchanges between officers and civilians.”) (statement of Senator Devin Robinson).

13. Pursuant to 42 Pa.C.S. § 67A06(e), this Court should grant this Petition and order disclosure of the requested footage if it determines that Petitioners have established the following by a preponderance of the evidence:

- i. Petitioners’ request was not denied under 42 Pa.C.S. § 67A04; and
- ii. The public interest in disclosure or the interest of Petitioners outweighs the interests of law enforcement or an individual’s interest in nondisclosure.

14. “A preponderance of the evidence standard, the lowest evidentiary standard, is tantamount to a more likely than not inquiry.” *Carey v. Pa. Dep’t of Corr.*, 61 A.3d 367, 374 (Pa. Commw. Ct. 2013) (citation and internal quotation marks omitted), *supplemented by* No. 1348 C.D. 2012, 2013 WL 3357733 (Pa. Commw. Ct. July 3, 2013).

Petitioner’s Request Was Not Properly Denied Under § 67A04.

15. Per Section 67A04(a) of the Act, a law enforcement entity may deny an Act 22 request *only* if the relevant audio or video footage “contains potential evidence in a criminal matter, information pertaining to an investigation or a matter in which a criminal charge has been filed, confidential information[,], or victim information[,], and the reasonable redaction of the audio or video recording would not safeguard” said evidence or information. 42 Pa.C.S. § 67A04(a).

16. Here, Respondent does not claim that any footage contains potential evidence, confidential information, or victim information. Ex. B. Instead, Respondent has denied access to

the footage because it asserts the incident was not “investigated” by the Pennsylvania State Police. *Id.* This rationale has no basis in the Act. Under § 67A04(a), the question is not whether the agency in possession of the footage “investigated” an incident, but whether release of the recording would impair potential evidence, information pertaining to an investigation, confidential information or victim information. 42 Pa.C.S. § 67A04(a). Therefore, the request was not denied under § 67A04.

The Public Interest in Disclosure Outweighs Any Countervailing Interests in Nondisclosure.

17. It is more likely than not that the public interest in disclosure of the requested footage, and/or the interest of Petitioners, outweighs the interests of Respondent and/or an individual’s interest in nondisclosure.

18. In making its public interest disclosure determination, this Court may consider:

- i. “the public’s interest in understanding how law enforcement officers interact with the public,”
- ii. “the interests of crime victims, law enforcement and others with respect to safety and privacy,” and
- iii. “the resources available to review and disclose the audio recording or video recording.”

42 Pa.C.S. § 67A06(e).

19. Here, there is significant public interest in the circumstances surrounding the August 19, 2025, incident. In addition to Petitioners’ coverage of this incident, *see supra* ¶¶ 5–6, numerous news outlets throughout Pennsylvania have reported on the arrests. *See, e.g.,* Anne Danahy, *ICE releases limited information on arrests of 24 in Centre County*, WPSU (Aug. 26, 2025), <https://radio.wpsu.org/2025-08-26/ice-releases-limited-information-on-arrests-of-24-in->

[centre-county](https://www.psu.collegian.com/news/borough/they-are-terrorizing-our-communities-activist-groups-hold-press-conference-on-recent-ice-action-seizure/article_d870397b-0ee4-4749-9e47-2744918300dd.html); Jocelyn Bilker, *'They are terrorizing our communities': Activist groups hold press conference on recent ICE action, seizure*, The Daily Collegian (Aug. 21, 2025), https://www.psu.collegian.com/news/borough/they-are-terrorizing-our-communities-activist-groups-hold-press-conference-on-recent-ice-action-seizure/article_d870397b-0ee4-4749-9e47-2744918300dd.html; Tristan Klinefelter, *Congressman Glenn Thompson comments on recent ICE arrests in Centre County*, WTAJ (Aug. 29, 2025), <https://www.wtaj.com/news/local-news/congressman-glenn-thompson-comments-on-recent-ice-arrests-in-centre-county/>; WJAC Staff, *Federal immigration arrests in Centre County praised and critiqued amid community debate*, Local 21 News (Sept. 2, 2025), <https://local21news.com/news/local/federal-immigration-arrests-in-centre-county-praised-and-critiqued-amid-community-debate>.

20. This coverage stems from the public's profound interest in better understanding local law enforcement officers' interactions with their communities and with federal law enforcement officers. Justice Brennan recognized half a century ago that members of the news media may "guard[] against the miscarriage of justice by subjecting the police, prosecutors, and judicial processes . . . to the cleansing effects of exposure and public accountability." *Neb. Press Ass'n v. Stuart*, 427 U.S. 539, 587 (1976) (Brennan, J., concurring) (citation omitted). Indeed, "[c]ommentary and reporting on the criminal justice system"—in which police officers play a central role—"is at the core of First Amendment values, for the operation and integrity of that system is of crucial import to citizens concerned with the administration of government." *Id.*

21. These principles are echoed today by communities and governments in Pennsylvania and beyond, particularly in light of increased federal immigration enforcement and public debate over what role local law enforcement should play in implementing federal immigration law. *See, e.g.*, Abigail Hakas, *Law enforcement agencies are working with ICE to*

make arrests in Pennsylvania, WESA (July 8, 2025), <https://www.wesa.fm/courts-justice/2025-07-08/pennsylvania-police-law-enforcement-collaborating-with-ice>; Kenny Cooper, *Cheltenham residents urge officials to adopt immigrant welcoming policy*, WHYY (Sept. 23, 2025), <https://whyy.org/articles/cheltenham-pennsylvania-immigrant-welcoming-policy/>.

22. Pennsylvania State Police policy prohibits PSP from assisting federal immigration officials. *See* AR 7-14, *Enforcement of Civil Immigration Law: Arrest/Detention or Death of Foreign Nationals*, § 14.01 (Feb. 28, 2022), <https://www.pa.gov/content/dam/copapwp-pagov/en/psp/documents/regs-manuals/AR%207-14.pdf>.

23. Eyewitnesses reported seeing PSP officers assisting in the August 19, 2025, incident. *See* Jocelyn Bilker, *‘They are terrorizing our communities’: Activist groups hold press conference on recent ICE action, seizure*, *The Daily Collegian* (Aug. 21, 2025), https://www.psucollegian.com/news/borough/they-are-terrorizing-our-communities-activist-groups-hold-press-conference-on-recent-ice-action-seizure/article_d870397b-0ee4-4749-9e47-2744918300dd.html. PSP has claimed in a statement to Petitioners that “multiple troopers made stops and inquiries after encountering this ICE operation, and all left after being told everything was OK.” This statement, an email from Communications Director Myles Snyder in response to an inquiry from CDT, is attached as **Exhibit C**.

24. The information released to date about the August 19, 2025, incident leaves many important questions unanswered. Access to the requested footage will give the public and the press information to better understand the role that Pennsylvania State Police played in the arrest of 24 people in Centre County and whether that role was in accordance with Pennsylvania State Police policy.

25. Finally, PSP has “the resources available to review and disclose the audio recording or video recording.” 42 Pa.C.S. § 67A06(e).

26. Law enforcement officials in Pennsylvania routinely release body camera footage proactively or in response to an Act 22 request. For instance, in the wake of massive public outcry over the fatal police shooting of a 27-year-old Lancaster man, Lancaster police released footage from the officers’ body cameras. *See* Lori Burkholder, *Lancaster Police Video: Man Fatally Shot Ran at Officer While Holding Knife*, WGAL8 (Sept. 14, 2020), <https://www.wgal.com/article/lancaster-police-body-cam-video-shooting-man-armed-with-knife-ricardo-munoz/34009627>. Similarly, police in Philadelphia, in consultation with their elected District Attorney, released body camera footage showing the death of a man at the hands of law enforcement. Max Marin, *‘Shoot him’: Body camera footage shows officers who shot and killed Walter Wallace Jr.*, WHYY (Nov. 4, 2020), <https://perma.cc/CG6N-A5FL>. In Lancaster County, a recent Act 22 appeal was voluntarily dismissed after the City of Lancaster agreed to produce more than 16 hours of footage depicting law enforcement clashes with protesters. Notice of Voluntary Dismissal, *Meko v. City of Lancaster*, No. CI-21-00277 (Pa. Ct. Com. Pl., Lancaster Cnty. Oct. 4, 2021). And in Cumberland County, another Act 22 matter was dismissed after the Cumberland County District Attorney agreed to permit Patriot-News/PennLive reporter Charles Thompson to view body camera footage of the fatal police shooting of Roger Wayne Ellis. *See* Notice of Voluntary Dismissal, *Thompson v. Cumberland Cnty.*, No. 2022-03057 (Pa. Ct. Com. Pl., Cumberland Cnty. July 28, 2022), <https://www.rcfp.org/litigation/thompson-v-cumberland-county/>.

27. Indeed, modern technology renders release of the audio and video footage Petitioners seek here—along with any necessary redaction or blurring—routine and

straightforward. For instance, a Lancaster County reporter's Act 22 request was fulfilled by a local police department within five days of submission of the request. Carter Walker, *Lancaster County president judge at traffic stop: 'You better check the registration on this plate soon' [video]*, LancasterOnline (June 16, 2019), <https://perma.cc/8GKB-Q5AZ>. In Harrisburg, law enforcement released video of an incident involving police interacting with a community activist within mere days. See Christine Vendel, *Police release body cam video of Harrisburg activist's arrest after she calls for officer to be fired*, PennLive (Nov. 12, 2020), <https://perma.cc/U5AP-TCWH>.

28. Relatedly, courts across the country have recognized that in lieu of “categorically ban[ning] disclosure of all investigatory” records, agencies need only employ “ways to limit rather than wholly exclude the release of the records sought so as to address any reasonable concerns,” such as “blurring portions of video that show [witnesses’] faces, and possibly altering their voices,” *Courier-J., Inc. v. Shively Police Dep’t*, No. 2021-CA-1120-MR, 2022 WL 16842295, at *7 (Ky. Ct. App. Nov. 10, 2022) (involving request by a Kentucky newspaper); see also *Stahl v. Dep’t of Just.*, No. 19-CV-4142 (BMC), 2021 WL 1163154, at *7 (E.D.N.Y. Mar. 26, 2021) (opining that because editing of audio-visual material to satisfy public records requests “is routine and inexpensive, an agency cannot credibly claim that it lacks access to this technology”).

29. So too here. Accordingly, Respondent should disclose the requested footage, with any necessary redactions, per the clear tenets of Act 22.

WHEREFORE, Petitioners ask this Honorable Court to:

1. Grant this Petition for Review and order access to the requested records; or
2. In the alternative, grant this Petition for Review and establish a briefing schedule or set a date for an evidentiary hearing; and
3. Grant such other relief as may be appropriate.

Respectfully submitted,

Dated: October 8, 2025

/s/ Paula Knudsen Burke

Paula Knudsen Burke
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
PA ID: 87607
PO Box 1328
Lancaster, PA 17608
pknudsen@rcfp.org
Counsel for Petitioner

Exhibit A

IN THE DAUPHIN COUNTY COURT OF COMMON PLEAS
CIVIL DIVISION

**BRET PALLOTTO and
CENTRE DAILY TIMES,**

Petitioners,

v.

PENNSYLVANIA STATE POLICE,

Respondent.

Docket No. _____

DECLARATION OF BRET PALLOTTO

I, Bret Pallotto, declare as follows:

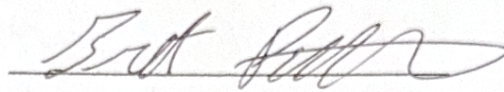
1. I am the crimes and court reporter for the Centre Daily Times, a print and online news outlet covering Centre County.
2. My business address is 221 W. High Street, Suite 1200, Bellefonte, PA 16823.
3. I have personal knowledge of the matters stated in this declaration.
4. A critical component of my work as the crimes and court reporter is obtaining and reviewing public records through the use of state public records laws, as well as obtaining judicial records from courts.
5. Following the August 19, 2025 arrests of 24 individuals by federal Immigration and Customs Enforcement (ICE) officials on Interstate 99 near Bellefonte, Centre County, PA, I sought to provide our readers with more information about what happened.
6. On August 29, 2025, I sent via certified mail addressed to the Pennsylvania State Police, Bureau of Records, 1800 Elmerton Avenue, Harrisburg, PA, 17110 a Law Enforcement Recording Request Form (the "Form"). I mailed the Form from the USPS Office at 132 N. Allegheny St., Bellefonte, PA 16823. I did not maintain a copy of the certified mail

receipt. A copy of the Form is attached and incorporated herein as **Declaration Exhibit**

1.

I declare under penalty of perjury that the foregoing is true and correct. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. §4904 (relating to unsworn falsification to authorities).

Executed on Sept. 29, 2025 [date]

A handwritten signature in black ink, appearing to read "Bret Pallotto", written over a horizontal line.

Bret Pallotto

Law Enforcement Recording Request Form – Act 22 of 2017

*This form can be used to request law enforcement recordings ("any audio recording or video recording made by a law enforcement agency") under Act 22 of 2017. Note that the Right-to-Know Law does not apply to such recordings. Any denials must be appealed to the appropriate Court of Common Pleas, **not** the Office of Open Records.*

SUBMITTED TO AGENCY NAME: Pennsylvania State Police (Attn: AOR0)

Date of Request: 8/26/25 Submitted via: ☒ U.S. Mail ☐ In Person
(Act 22 requires requests to be submitted via "personal delivery or certified mail.")

PERSON MAKING REQUEST:

Name: Bret Pallotto Company (if applicable): Centre Daily Times

Mailing Address: 299 W. Beaver St.

City: Bellefonte State: PA Zip: 16823 Email: bpallotto@centredaily.com

Telephone: 717-250-9895 Fax: _____

How do you prefer to be contacted if the agency has questions? ☐ Telephone ☒ Email ☐ U.S. Mail

RECORDING REQUESTED: *Requests must be submitted within **60 days** of the event recorded. **All of the following information is required.** Be thorough; use additional pages if necessary.*

Date and Time of the Event: Approximately 7 a.m. Aug. 19, 2025

Location of the Event: Interstate 99 near Bellefonte

Describe the Event:

Multiple troopers made stops and inquires after encountering an ICE operation

Describe Your Relationship to the Event:

Journalist

If the Event Occurred in a Residence, Identify All People Present (*unless unknown & not reasonably ascertainable*):

If an Act 22 request is granted, the agency may charge "reasonable fees" to provide a copy of the recording.

Please notify me if fees associated with this request will be more than ☒ \$100 (or) ☐ \$_____.

ITEMS BELOW THIS LINE FOR AGENCY USE ONLY

Tracking: _____ Date Received: _____ Response Due (30 cal. days): _____

Extension? ☐ Yes ☐ No (If Yes, Final Due Date: _____) Actual Response Date: _____

Request was: ☐ Granted ☐ Partially Granted & Denied ☐ Denied Cost to Requester: \$_____

NOTE: *In most cases, a completed Request Form is a public record.
More information about Act 22 is available at <https://www.openrecords.pa.gov>*

Form updated March 16, 2020
by the Office of Open Records

Declaration Exhibit 1

Exhibit B



PENNSYLVANIA STATE POLICE
DEPARTMENT HEADQUARTERS
1800 ELMERTON AVENUE
HARRISBURG, PENNSYLVANIA 17110

Mailing Date: September 8, 2025

Bret Pallotto
Centre Daily Times
299 W. Beaver St.
Bellfonte, PA 16823

PSP AV 2025-0310

Dear: Mr. Pallotto

The Pennsylvania State Police (PSP) received your request for an audio/video recording regarding an incident that occurred on August 19, 2025 at approximately 7:00 am, on Interstate 99 near Bellfonte.

The video recording you are seeking is not an audio/video recording made by or associated with an incident investigated by Pennsylvania State Police. You may seek information on obtaining audio/ video recordings by contacting ICE.

If you require further assistance in this matter, please direct correspondence to me at the above-listed address or contact Shane Thompson at 717-231-7017 or shanethomp@pa.gov

Respectfully,

A handwritten signature in black ink, appearing to read "William A. Rozier".

William A. Rozier, J.D
Agency Open Records Officer
Pennsylvania State Police
Bureau of Records & Identification
Right-to-Know Law/Subpoena Section
1800 Elmerton Avenue

Harrisburg, Pennsylvania 17110
Email: RA-psprighttoknow@pa.gov
1.877.785.7771 (Main); 717.525.5795 (Fax)

Enclosures: Pallotto audio/video request

Exhibit C

Friday, September 26, 2025 at 12:55:48 PM Eastern Daylight Time

Subject: Fwd: ICE Operation
Date: Monday, September 22, 2025 at 12:47:02 PM Eastern Daylight Time
From: Pallotto, Bret
To: Rachel Seller, Paula Knudsen Burke, Jessica McAllister
Attachments: image001.png, image002.png, image003.png

Here it is.

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

From: **Snyder, Myles** <mysnyder@pa.gov>
Date: Thu, Aug 21, 2025 at 3:03 PM
Subject: ICE Operation
To: bpallotto@centredaily.com <bpallotto@centredaily.com>

Good afternoon, Bret.

Following up, we've learned that multiple troopers made stops and inquiries after encountering this ICE operation, and all left after being told everything was OK. Again, no troopers were involved in this operation in any way.

Thank you.

Myles Snyder | Communications Director

Pennsylvania State Police | Department Headquarters

1800 Elmerton Avenue | Harrisburg PA 17110

Phone: 717.782.4305 | psp.pa.gov



IN THE DAUPHIN COUNTY COURT OF COMMON PLEAS
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Docket No.

[PROPOSED] ORDER

The Court has considered Bret Pallotto and the Centre Daily Times' Petition for Review, including its declaration and exhibits, as well as all opposition and responses thereto. For all the reasons set forth in this Petition and accompanying documents, it is **HEREBY ORDERED** that:

1. Petitioners are entitled to the records requested in the Act 22 request made by Bret Pallotto;
2. The petition is granted, and Respondent must provide access to the records;
3. The denial of the Act 22 request was not proper under 42 Pa.C.S. § 67A04;
4. The public interest in disclosure of the requested records outweighs the interests of law enforcement or an individual's interest in nondisclosure.

SO ORDERED this ____ day of _____, 2025

J.

Distribution legend:

For Petitioner: Paula Knudsen Burke, PO Box 1328, Lancaster, PA 17608; phone (717) 370-6884, email pknudsen@rcfp.org

For Respondent: William A. Rozier, PSP Headquarters, 1800 Elmerton Avenue, Harrisburg, PA 17110; phone (877) 785-7771, email RA-psprighttoknow@pa.gov

VERIFICATION

I, Paula Knudsen Burke, hereby state that the facts above set forth in the Petition for Review are true and correct to the best of my knowledge, information and belief and I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Signed: /s/ Paula Knudsen Burke

Dated: October 8, 2025

CERTIFICATE OF COMPLIANCE WITH PUBLIC ACCESS POLICY

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Paula Knudsen Burke

Signature: /s/ Paula Knudsen Burke
Attorney No.: 87607

CERTIFICATE OF SERVICE

Pursuant to 42 Pa.C.S. § 67A06(b)(4), I hereby certify that this Petition and its attachments will be served upon the Respondent via hand-delivery within five days of the date of filing with this Court by hand-delivery:

William A. Rozier
Agency Open Records Officer
Pennsylvania State Police
Bureau of Records & Identification
Right-to-Know Law/Subpoena Section
1800 Elmerton Avenue
Harrisburg, PA 17110

Submitted by: Paula Knudsen Burke

Signature: /s/ Paula Knudsen Burke
Attorney No.: 87607