Received 10/20/2025 5:09:16 PM Superior Court Middle District

Filed 10/20/2025 5:09:00 PM Superior Court Middle District
662 MDA 2025

IN THE SUPERIOR COURT
of PENNSYLVANIA

No. 662 MDA 2025

COMMONWEALTH OF PENNSYLVANIA
v.
VERONIKA RODRIGUEZ, Defendant

INITIAL BRIEF OF MEDIA INTERVENORS

On Appeal from the May 19, 2025 Order of the
Court of Common Pleas of Lebanon County

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STATEMENT OF JURISDICTION

This Court has jurisdiction over this appeal, which is taken from the May 19, 2025 Order of the Court of Common Pleas of Lebanon County in the matter *Commonwealth of Pennsylvania v. Veronika Rodriguez*, pursuant to 42 Pa.C.S. § 742. That order denied Media Intervenors' motion to intervene and to unseal certain judicial records in the case.

Additionally, this Court has jurisdiction pursuant to the collateral order doctrine, which provides for immediate appellate review of orders denying motions to intervene for the limited purpose of seeking access to judicial records and proceedings, as well as orders on motions to unseal. *See* Pa. R.A.P. 313; *Cap. Cities Media, Inc. v. Toole*, 483 A.2d 1339, 1344 (Pa. 1984); *Commonwealth v. Long*, 922 A.2d 892, 897 (Pa. 2007); *A.A. v. Glicken*, 237 A.3d 1165, 1169 (Pa. Super. Ct. 2020). Access-based motions to intervene and unseal are separate from the merits of the underlying case; they raise the important and "deeply rooted" right of timely public access to the courts; and the access rights they seek to vindicate will be irreparably lost absent appellate review. *Glicken*, 237 A.3d at 1168–69.

Lastly, as explained below, the court filings at issue in this appeal have now been disclosed as part of the record on appeal, pursuant to this Court's order of September 10, 2025. R.357a. This, however, does not affect this Court's jurisdiction to hear this appeal, as the issues being raised are "capable

of repetition yet evading review." *S. Pac. Terminal Co. v. Interstate Com. Comm'n*, 219 U.S. 498, 515 (1911); *see also Pub. Def.'s Off. of Venango Cnty. v. Venango Cnty. Ct. of Common Pleas*, 893 A.2d 1275, 1279–80 (Pa. 2006). In particular, appellate courts—including the U.S. Supreme Court—have made clear that appealing denial of a motion for access to judicial proceedings and records is appropriate, even when the proceeding is over or the records have been revealed, because "[i]t can reasonably be assumed that petitioner will be subjected to a similar closure order and, because criminal proceedings are typically of short duration, such an order will likely evade review." *Press-Enter. Co. v. Super. Ct. of Cal., Riverside Cnty.*, 478 U.S. 1, 6 (1986) (citations omitted). *See Commonwealth v. Long*, 922 A.2d 892, 897 ("[W]hile Appellants have obtained access to the jurors' names and addresses in this case and the issue is therefore moot, we will review the issues raised since they are capable of repetition yet likely to evade review and involve an issue important to the public interest."); *Kurtzman v. Hankin*, 714 A.2d 450, 452 (Pa. Super. Ct. 1998) (explaining that "the appeal of a media intervenor is not rendered moot by the completion of the underlying action" because "there is a reasonable expectation that media intervenors will be subject to such judicial orders again in the future"); *United States v. Simone*, 14 F.3d 833, 836 (3d Cir. 1994) (holding that appeal of denial of access to hearing in a criminal case "falls squarely within that category of cases that are 'capable of repetition, yet evading review'"); *cf. In re 2014*

Allegheny Cnty. Investigating Grand Jury, 173 A.3d 653, 655 (Pa. 2017) (reversing Superior Court decision that news organization's appeal of denial of its motion for access to records was moot because the appellant had obtained the documents by other means, noting that "the common law right of access to public judicial records is not obviated by any and all forms of dissemination by third-party sources").

DECISION UNDER REVIEW

Appellants LebTown, PennLive, LNP Media Group, Inc., and WITF (collectively, "Media Intervenors") seek review of the order of the Court of Common Pleas of Lebanon County in the matter *Commonwealth of Pennsylvania v. Veronika Rodriguez*, No. 662 MDA 2025, dated May 19, 2025. **Exhibit A.** That order denied in full, Media Intervenors' Motion to Intervene and Unseal. Media Intervenors' Concise Statement of the Errors Complained of on Appeal is appended as **Exhibit B** pursuant to Pa. R.A.P. 2111(d).

SCOPE AND STANDARD OF REVIEW

This Court reviews *de novo* all legal determinations made by the Court of Common Pleas, including rulings on motions to intervene, *see Schriner v. Schaffhauser*, No. 1762 MDA 2012, 2013 WL 11261854, at *2 n.1 (Pa. Super. Ct. June 18, 2013) and rulings on "'whether there exists a common law or constitutional right of public access to a judicial proceeding'" or record, and the scope of its review is plenary, *see Commonwealth v. Curley*, 189 A.3d 467, 472 (Pa. Super. Ct. 2018)

(quoting *Commonwealth v. Selenski*, 996 A.2d 494, 496 (Pa. Super. Ct. 2010)). "A trial court's decision . . . regarding access to a particular item must be reviewed for abuse of discretion." *Selenski*, 996 A.2d at 508. A trial court commits an abuse of discretion when it errs as a matter of law or its decision is "the result of partiality, prejudice, bias, or ill-will." *Kurtzman v. Hankin*, 714 A.2d 450, 453 (Pa. Super. Ct. 1998).

QUESTIONS INVOLVED

1. Did the trial court err as a matter of law when it denied Media Intervenors' motion to intervene for the limited purpose of seeking access to sealed judicial records?

   Suggested answer: Yes.

2. Did the trial court err as a matter of law when it denied Media Intervenors' motion to access sealed judicial records?

   Suggested answer: Yes.

STATEMENT OF THE CASE

This appeal concerns a motion to intervene by a group of news organizations seeking to unseal certain filings in the above-captioned criminal case. Acting out of apparent concern over pretrial publicity, the Court of Common Pleas entered two gag orders on the parties and kept three filings under seal throughout the duration of the trial and up until the initiation of this appeal.

Media Intervenors LebTown, PennLive, LNP Media Group, Inc., and WITF, are local media organizations that provide news coverage of and for central

Pennsylvania communities. Their coverage extends to all of Pennsylvania but serves, in particular, Lebanon County, Lancaster County, and the city of Harrisburg, PA and surrounding areas. *See* R.237a–38a ¶¶ 1–7. This work involves reporting on criminal and civil matters in Pennsylvania courts, including those proceeding before the Lebanon County Court of Common Pleas and local Magisterial District Judges. To do this work and to keep the public informed about matters of interest to central Pennsylvania communities, Media Intervenors require reliable access to court dockets and filings. This includes access to court filings in the above-captioned case. Media Intervenors have been reporting on this matter since its inception.[1] The interest of the public in this matter is further evidenced by coverage beyond that provided by Media Intervenors.[2]

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[1] *See, e.g.*, James Mentzer *County Commissioners Allocate Over $3 Million in ARPA Funds for Four Projects*, LEBTOWN (Dec. 23, 2024), https://perma.cc/8TK2-RPSX ("Rodriguez, a member of the Pennsylvania Air National Guard, was arrested in March 2023 over two counts of felony wiretapping and one misdemeanor charge of making a false report to law enforcement."); Chris Coyle, *Jury Hears Recording from Date that Led to Woman's Allegedly False Rape Report*, LEBTOWN (May 21, 2025), https://perma.cc/88UA-HVFK; Charles Thompson, *Pa. Woman Convicted of Falsely Reporting Rape in Highly Scrutinized Case Learns Sentence*, PENNLIVE (Aug. 20, 2025) https://perma.cc/65U2-7FNU; Dan Nephin, *Ephrata Woman Charged with Harassing Prosecutor Says She's Victim of Selective Prosecution*, LNP LANCASTERONLINE (Aug. 26, 2025), https://perma.cc/SAT3-6N2H ("In May, a Lebanon County jury convicted Rodriguez, 27, of Middletown, of making a false rape report and two charges related to secretly recording an encounter between her and the man she accused. On Aug. 20, Lebanon County Judge Charles T. Jones Jr. sentenced her to one month to two years in Lebanon County Prison. She will also be on probation for a year and must perform 100 hours of community service.").

[2] *See, e.g.*, Sarah Burns, *Middletown Woman Sentenced for Falsely Reporting Rape, Illegally Recording Sex: Officials*, LOCAL 21 NEWS (Aug. 20, 2025), https://perma.cc/U3JX-BDY6; Hayden Sherry, *Dauphin County Woman Sentenced for False Ft. Indiantown Gap Rape Allegation, Wiretapping*, ABC27 (Aug. 20, 2025), https://perma.cc/QK2W-CHEV; Keith Schweigert, *Woman Convicted of Illegally Recording Sexual Encounter She Later Claimed Was Rape Sentenced to 30 Days to 2 Years in Prison*, FOX43 (Aug. 20, 2025), https://perma.cc/3GYR-2JA9.

The above-captioned case concerns charges brought against a woman who was a member of the Pennsylvania Air National Guard. R.018a. On January 11, 2023, Veronika Rodriguez ("Defendant") went to Fort Indiantown Gap Police—a law enforcement agency in Lebanon County—and informed the department that she had been raped during an encounter on January 8, 2023 at a property located at Fort Indiantown Gap, Annville, PA. R.022a. In response to her report of rape, Fort Indiantown Gap Police charged Defendant on March 8, 2023 by filing in Magisterial District Court a criminal complaint alleging that Defendant made false reports to law enforcement authorities. R.018a–R.022a.

After Defendant waived her preliminary hearing on March 30, 2023, the case advanced to the Lebanon County Court of Common Pleas. R.0014a–R.005a. The District Attorney's ("DA") Office on April 17, 2025 filed an information charging Defendant with two counts of Interception, Disclosure of Use of Wire, Electronic or Oral Communication and one count of False Reports to Law Enforcement Authorities. R.025a. On April 21, 2025, the DA's office filed an amended information changing the township in which the Defendant allegedly committed the listed crimes from Annville Township to East Hannover Township. R.026a. Both the original and amended information were based on Defendant's report to police officers that she had been the victim of an alleged sexual assault by a superior, who was an Officer in the Pennsylvania Air National Guard. *See* R.025a; R.026a.

As the case progressed through the Court of Common Pleas, the Defendant indicated she would be introducing expert witness testimony. R.027a. In response, on August 13, 2024, the DA moved to preclude the testimony of the two expert witnesses whom Defendant intended to use at trial; one expert was a retired police officer and detective with the San Diego Police Department and the second was a forensic and licensed clinical psychologist. *See* R.027a; R.031a. The DA's motion, which included detailed descriptions of events surrounding the alleged sexual assault, argued the experts would be providing opinions regarding the victim's credibility in violation of 42 Pa.C.S. § 5920(s). R.027a–R.031a. A hearing was held on the DA's motion to preclude the Defendant's expert testimony on October 30, 2024. R.091a. Judge Charles T. Jones, Jr. determined that the retired detective would not be allowed to testify and requested additional case law regarding the DA's argument that the forensic psychologist knew too much information about the facts of this case and therefore could not be a "blind" witness who would "explain victim trauma responses to trauma generally." R.097a–R.098a.

Following the October 30, 2024 hearing, Judge Jones issued a gag order on December 17, 2024 prohibiting the parties' counsel, all members of every counsel's respective office, the Defendant, all members of the Defendant's family, and all witnesses from disseminating information about the above-captioned case to anyone, including the press. *See* R.090a. The order specifically stated: "This Order shall

preclude any above listed person from speaking with anyone in the news media, online media, or any other source." *Id.*

Beginning early in 2025, three unknown entries appeared on the docket as "sealed" without explanation.[3] The first was filed on February 10, 2025 by the DA's Office. R.012a. The second was filed the same day by Judge Jones. *Id.* The third was filed on May 2, 2025 by the DA's Office. R.014a.

Judge Jones held a hearing on May 1, 2025 on the third sealed docket entry, which has since been revealed to be the Commonwealth's Motion in Limine to Introduce at Trial Evidence Relevant to the Defendant's Consent to Sexual Activity, Motive, Intent and Credibility ("Motion in Limine"). R.113a; R.180a. The Motion in Limine was recorded on the docket as being filed under seal on May 2, 2025. R.014a. However, an undocketed copy of the Motion apparently was presented to Judge Jones and counsel during the hearing a day earlier on May 1, 2025. R.115a. Assistant District Attorney Amy Muller stated on the record, "Your Honor, obviously the bigger motion that we have filed for today's purposes is the Motion in

[3] Media Intervenors now know (because of the Superior Court's September 10, 2025 order directing the Superior Court Prothonotary to unseal the record in the instant appeal) that those sealed entries were: (i) the DA's Motion to Allow Dissemination and Transcription, in which "[t]he Commonwealth [requested] the sealing of this Order to discourage further social media incidents"; (ii) Judge Jones' Order Granting the DA's Motion to Allow Transcription; and (iii) the DA's office Motion in Limine to Introduce at Trial Evidence Relevant to the Defendant's Consent to Sexual Activity, Motive, Intent and Credibility. R.352a; R.321a; R.324a. The trial level docket from May 19, 2025 (the date of the Motion to Intervene and Unseal) shows only "Sealed Entry" filed by the DA (page 14 of 17 of original transcript). R.014a.

Limine with respect to largely the contents of the Defendant's phone. Obviously the Court has a copy, counsel has a copy, I also have a copy." R.115a. Ms. Muller then suggested that the Motion be displayed within the courtroom rather than the parties relying on their paper copies: "I am also prepared . . . to display it if that's okay with the Court." R.115a–R.116a. Judge Jones agreed that "we might as well display it." R.116a. The parties and Judge Jones discussed the Motion in great detail, exhibit by exhibit, appearing to project it onto a screen in open court. R.116a–R.178a. At least two reporters, one from LebTown and another from PennLive, were in the courtroom during this hearing and later published articles on, *inter alia*, the contents of Defendant's phone records as presented in open court.[4]

At no point during the hearing did Judge Jones or either party mention sealing the Motion in Limine. R.113a–R.178a. Yet when the Motion was entered on the docket on May 2, 2025, it was sealed and not accessible to the press or the public,

[4] Jonathan Bergmueller, *Charged After Accusing Army Officer of Rape, Woman Threatened with Jail for Violating Gag Order*, PENNLIVE (May 19, 2025), https://perma.cc/4KC6-74G9 ("The discussion about sending Rodriguez to jail followed an hour-long evidentiary hearing where her attorney, Ian Ehrgood, tried to keep out of court extensive text message records that documented private conversations between Rodriguez, her friends, and past romantic partners. Some of those conversations discussed her personal fitness, her weight, how fast she could run a mile, and medical procedures that prevented her from completing basic training."); Chris Coyle, *Judge Hears Pretrial Arguments in Veronika Rodriguez Case*, LEBTOWN (May 9, 2025), https://perma.cc/SL5A-PSS4 ("In a darkened courtroom, Assistant District Attorney Amy Muller projected some of the texts exchanges discovered on Rodriguez's phone and argued to Jones that a jury could find they show a consensual sexual encounter.").

despite the fact that members of both were present in the courtroom where the Motion was displayed and discussed for all to see and hear. R.014a.

Although there was no reference to sealing during the May 1, 2025 hearing, Assistant District Attorney Amy Muller did express concern about dissemination of information about the case, stating that "this Defendant has had communication with a witness. It's via text message. However, she sent a text saying there's a podcast regarding a segment on my case." R.175a–R.176a. Ms. Muller continued, "the Gag Order was put in place on December 17th . . . Speaking to a podcast person is a violation of the Gag Order. I'm asking that it stop." R.176a. Judge Jones later stated, "I would rather not try to get a jury and find out that every single person has heard something about this that affects their ability to listen to this case." R.177a. Within days of the May 1, 2025 hearing and discussion of the gag order, Judge Jones presided over a different hearing on May 8, 2025, which largely focused on gag order compliance. The DA's office was seeking bail revocation for an alleged text message that Defendant sent in violation of the gag order. At the conclusion of the hearing, the DA and defense counsel left the courtroom and drafted a second gag order, which was then read into the record and adopted by Judge Jones. N.T. 33. This order clarified the existing restrictions as to whom the Defendant was permitted to speak, but left the remaining terms of the November 17, 2024 gag order in place. *See* R.236a.

Media Intervenors presented their Motion to Intervene and Unseal prior to the scheduled start of the jury trial on May 19, 2025. R.328a. The Motion was clocked in at the Clerk of Courts office at 8:34 a.m. the morning of May 19. R.237a. Media Intervenors' counsel then hand-delivered the time-stamped motion to the parties and Court Administration, who then delivered the motion to Judge Jones. Judge Jones did not see or hear argument from Media Intervenors' counsel, rather, he immediately denied both the intervention and unsealing. **Exhibit A**. The order denying the Motion to Intervene and Unseal was entered at 10:05 a.m. *Id.* That same day—at 1:34 p.m.—Media Intervenors filed a Notice of Appeal to the Superior Court. R.277a. Throughout the course of the jury trial, which extended from May 19, 2025 through the jury's verdict on May 23, 2025, the three docket entries remained sealed. R.001a; R.306a; R.342a.

When Judge Jones removed the December 17 and May 8 gag orders on May 23, 2025, the three docket entries at issue stayed sealed. R.342a. The filings then remained sealed throughout the beginning phases of the Superior Court appeal. On July 11, 2025, Judge Jones entered an order asserting that "all information and docket entries were unsealed" and requested that this Court quash the appeal. R.342a. However, when counsel for the Media Intervenors attempted to review the record in the case in order to brief the appeal, she was told by court staff that she could not do so because the case was sealed. R.345a–346a. The Media Intervenors

thus filed in this Court an Application for Access to Trial Court Record and Updated Briefing Schedule. R.343a–R.346a.

On September 10, 2025, this Court entered an order denying the Access Application as moot and directing the Prothonotary of this Court to "unseal the record in this appeal and to re-establish the briefing schedule." R.357a. It was only then that the previously sealed docket entries were revealed to the Media Intervenors. However, to date, the trial court has not entered any order or opinion setting forth the basis of the original (or continued) sealing of these docket entries, nor for denying the Media Intervenors' Motion to Intervene and Unseal.

The instant brief is submitted in accordance with the briefing schedule entered on September 10, 2025.

SUMMARY OF ARGUMENT

The prosecution in the above-captioned case drew significant media and public attention for both the pre-trial and jury trial phases. Despite this widespread attention, the proceedings in the case were difficult to follow given the mysterious and erroneous sealing of three judicial records.

Media Intervenors (and the public) have a presumptive right of access under the First Amendment, the Pennsylvania Constitution, and the common law to the three filings that were erroneously sealed without explanation. The Court of Common Pleas has yet to provide any sealing order or otherwise explain why good

cause existed for sealing three records on the docket. Given that two separate gag orders made it impossible for the press to speak with attorneys or witnesses involved in the case, docket entries and observation of court proceedings became the only ways to learn information about the case. And when portions of the docket were sealed with no explanation, the press and the public were left in the dark as to what had been sealed and why, making Media Intervenors' job of keeping the public informed about a criminal case of interest unnecessarily difficult.

No compelling government interest outweighed Media Intervenors' and the public's right of access to these records. Interest from the press and the public in the form of pre-trial publicity about a criminal case is not, on its own, enough to warrant sealing records in that criminal case. Even if concerns about Defendant's ability to have a fair trial were truly compelling enough to restrict access to records in this case, the trial court should have articulated its reasoning in specific findings of fact on the record. To the extent any other compelling government interests in closure existed, the court was required to spell out specific findings of fact related to those interests on the record. Where compelling government interests do exist and are explained on the record, the law clearly requires that access restrictions be narrowly tailored. The wholesale sealing of three judicial records throughout the duration of the pre-trial and trial phases in the above-captioned case, where redactions would have been a perfectly viable solution, was judicial error.

In light of this judicial error, Media Intervenors respectfully request that this Court vacate the Court of Common Pleas' order denying their Motion to Intervene and Unseal.

ARGUMENT

I. The Court of Common Pleas erred in denying Media Intervenors' motion to intervene.

The Court of Common Pleas erred in denying Media Intervenors' motion to intervene in the above-captioned case. In denying Media Intervenors' motion without opinion or explanation, the Court of Common Pleas failed to observe longstanding Pennsylvania law holding that intervention is the appropriate means for members of the media to exercise their right of access to judicial records. *Commonwealth v. Fenstermaker*, 530 A.2d 414, 416 n.1 (Pa. 1987) ("The filing of a motion to intervene in a criminal case by the news media has long been recognized by this Court as an appropriate means of raising assertions of public rights of access to information regarding criminal case proceedings."); *Commonwealth v. Upshur*, 924 A.2d 642, 645 n.2 (Pa. 2007) (same).

To facilitate the press' right of access to judicial records, "it is incumbent upon the trial court to afford the opportunity for those representatives of the press and public present in the courtroom to move to intervene and be heard on the issue of whether the closure . . . is strictly and inescapably necessary." *Commonwealth v. Hayes*, 414 A.2d 318, 336 (Pa. 1980). Further, "the trial court must state on the

record the findings it considered in balancing the alleged need for closure against the constitutionally protected right of access." *Id.* This is "a critical part of the hearing procedure." *Id. See also Joseph L. Feliciani v. The Impact Project, Inc., et al.*, No. 864 EDA 2024, 2025 WL 2924447, at * 4 (Pa. Super. Ct. Oct. 15, 2025) (finding that a trial court order denying a newspapers' motion to intervene did so "without explanation" and holding that the trial court "should set forth its reasoning for denying intervention" on remand).

On May 19, 2025, Media Intervenors moved to intervene for the limited purpose of asserting their right of access to three sealed judicial records. R.237a. This right is enshrined in the First Amendment, the Pennsylvania Constitution, and the common law. Neither Defendant nor the DA contested Media Intervenors' intervention in the case for this purpose. *See generally* R.306a–341a. Each of the docket entries at issue was sealed without a sealing order or any other court order or any indication on the docket (or anywhere in the public record) about what these entries were or why they were sealed. R.012a–014a. Even though the Motion to Intervene was filed with the court ahead of the start of the criminal trial—as noted above, the motion was filed with the Clerk of Court at 8:34 a.m.—the trial court judge did not entertain argument or an appearance from Media Intervenors' counsel before ruling. Rather, in a summary fashion, the court denied the motion, and its order was docketed by 10:05 a.m. **Exhibit A.** The court erred in failing to afford

an opportunity for Media Intervenors to be heard on the issue of whether keeping the judicial records at issue sealed was strictly and inescapably necessary.

Because the court did not include an opinion accompanying its denial stating what findings it considered or why it found that the need for sealing outweighed their constitutionally-protected right of access, Media Intervenors were left without an explanation of why the records were sealed in the first place and why the court later denied Media Intervenors' motion to intervene to seek access to those records. To the extent the court denied Media Intervenors' motion to intervene because it concluded that Media Intervenors' right to access the sealed records was outweighed by prevailing considerations, this would be legal error. A motion to intervene must be considered separately from any motion that the party requesting intervention seeks to file once intervention is granted. *See Fenstermaker*, 530 A.2d at 416 n.1 ("Intervention of this type . . . that is provisional in nature and for the limited purpose of permitting the intervenor to file a motion [is] *to be considered separately*, requesting that access to proceedings or other matters be granted.") (emphasis added).

In short, Media Intervenors were left entirely in the dark and without an opportunity to be heard, despite the fact that they pursued the appropriate method of requesting access and no party objected to the intervention. On this basis, regardless of whether this Court determines that denial of the motion to *unseal* was appropriate

(and it should not), the denial of Media Intervenors' motion to *intervene* in the first instance was erroneous and should be vacated.[5]

II. The Court of Common Pleas erred in denying Media Intervenors' motion to unseal.

A. There is a strong presumption of access to judicial records.

Across the United States, criminal trials have historically been presumptively open to the public. *See Richmond Newspapers, Inc. v. Virginia*, 448 U.S. 555, 573 (1980); *In re Oliver*, 333 U.S. 257, 266 (1948). In Pennsylvania, the reasoning behind this presumption has been articulated as follows: "The nature of criminal law is such that it punishes offenses against the collective public, [] and, accordingly, members of the public have an interest in observing criminal justice processes[.]" *Fenstermaker*, 530 A.2d at 417 (citing *Commonwealth v. Bovaird*, 95 A.2d 173, 176 (Pa. 1953)).

The press has long enjoyed the same rights as other members of the public for court access purposes. *Estes v. State of Tex.*, 381 U.S. 532, 540 (1965) ("Nor can the courts be said to discriminate where they permit the newspaper reporter access to the courtroom. The television and radio reporter has the same privilege. All are entitled to the same rights as the general public."). That the press and the public

[5] As discussed above, even though the conclusion of the trial renders the question of intervention into the case moot, this Court may still consider the appeal of the denial of the motion to intervene because the error is "capable of repetition yet evading review." *See supra* pp. 1–3.

share the same presumptive right of access to judicial proceedings and records speaks to the press' importance in disseminating information about judicial proceedings and records to the public so that the public can "be assured that offenses perpetrated against [it] are dealt with in a manner that is fair to their interests, and fair to the interests of the accused." *Fenstermaker*, 530 A.2d at 417. This is the basis for Pennsylvania's common law right of access to judicial proceedings and records. *Id.*

In Pennsylvania, the press has a presumptive right of access to judicial records not only under the common law, but also under the First Amendment and Article I, sections 9 and 11 of the Pennsylvania Constitution. *Id.* The First Amendment right is stronger than the common law right of access because "under the First Amendment[,] proceedings can be closed only upon showing a compelling government interest and any restrictions must be narrowly tailored to serve that interest," whereas "the common law test requires the trial court to balance the presumption of openness against the circumstances warranting sealing of the document[.]" *Commonwealth v. Long*, 922 A.2d 892, 898 n.6 (Pa. 2007). Pennsylvania's Constitution reads "In all criminal prosecutions the accused hath a right to . . . a speedy *public* trial[,]" and "[a]ll courts shall be *open*." Pa. Const. art. I, §§ 9, 11 (emphasis added).

In addition, courts "emphasize the importance of immediate access where a right to access is found." *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 126–27 (2d Cir. 2006) (collecting cases); *see Grove Fresh Distrib., Inc. v. Everfresh Juice Co*., 24 F.3d 893, 897 (7th Cir. 1994) ("In light of the values which the presumption of access endeavors to promote, a necessary corollary to the presumption is that once found to be appropriate, access should be immediate and contemporaneous. . . . The newsworthiness of a particular story is often fleeting. To delay or postpone disclosure undermines the benefit of public scrutiny and may have the same result as complete suppression.") (internal citations omitted); *Republic of Philippines v. Westinghouse Elec. Corp*., 949 F.2d 653, 664 (3d Cir. 1991) ("[I]t is apparent to us that the public interest encompasses the public's ability to make a contemporaneous review of the basis of an important decision of the district court.").

Here, Media Intervenors sought access to three sealed sets of judicial records entered on the Court of Common Pleas' docket in the above-captioned case. Such records are presumptively open to the public and "subject to the First Amendment and common law rights of access." *Commonwealth v. Curley*, 189 A.3d 467, 473 (Pa. Super. Ct. 2018) ("Docket entries and other filings in a criminal proceeding are public records.").

Without any sealing orders explaining why the docket entries were closed to access, Media Intervenors cannot determine why the public is being denied access

to these docket entries. When placing judicial records under seal, courts in Pennsylvania are required to provide specific findings explaining why the presumption of access is not applicable to those records. *Curley*, 189 A.3d at 473 (holding that the trial court erred in failing to "issue individualized, specific, particularized findings on the record that closure is essential to preserve higher values and is narrowly tailored to that interest"). The Court of Common Pleas issued no such findings, leaving Media Intervenors unable to ascertain whether they were being deprived of information essential to reporting on this case, and if so why. Media Intervenors were not only denied their common law and constitutional rights to access these records, but they were also denied without any explanation of why the presumption was not applicable to those records.

B. The strong presumption of access to judicial records is not overcome in this case.

Where the presumption of access to judicial records attaches, as it does here, the burden is on the party seeking to prevent access to show "that closure is warranted under the circumstances" and to "obtain a court order sealing the documents." *Upshur*, 924 A.2d at 651. The trial court must then "hold a hearing and place on the record its reasoning and the factors relied upon in reaching its decision." *Id*.

Those requirements plainly were not met here. While the DA requested in its Motion to Allow Dissemination and Transcription that "[t]he Commonwealth [seal]

this Order to discourage further social media incidents," no party requested that Judge Jones seal the DA's Motion in Limine, which was displayed and dissected in open court before at least two members of the press before being sealed. R.109a; R.113a. Indeed, it seems the court sealed the Motion in Limine *sua sponte*. The court held no hearing and provided no reasoning for the sealing of any of the three documents, even after Media Intervenors moved to intervene and unseal. Instead, without holding any hearing, the trial court simply denied Media Intervenors' motion the very same day it was filed. **Exhibit A**.

That the Court of Common Pleas issued two gag orders in this case suggests the court had concerns about the impact of pretrial publicity on the defendant's right to a fair trial and on impartial jury selection. R.090a; R.236a. This inference is further supported by the court's comments during two hearings. On May 1, the trial court judge said he "would rather not try to get a jury and find out that every single person has heard something about [the case] that affects their ability to listen to this case." R.177a. And during a May 8 hearing, the trial court judge said, "What I would really not like is to see things in the paper and to affect the ability of who we are going to get and whether or not we're going to select a jury." R.204a. Furthermore, Judge Jones' July 11, 2025 and August 28, 2025 letters to the Superior Court explaining that all records were unsealed after the jury trial concluded on May

23, 2025, reinforce that he was concerned about the impact of the media on the trial. R.342a; R.355a.[6]

However, general concerns about pretrial publicity affecting a trial alone are not enough to justify denying public access to judicial records. In *Upshur*, the Supreme Court of Pennsylvania held that the Court of Common Pleas properly granted a media intervenor access to a tape played during a preliminary hearing despite concerns about pretrial publicity and jury selection because "pretrial publicity is not by itself sufficient to render a trial unfair and prevent public access" and "potential contamination of the jury pool could be adequately addressed by *voir dire* and change of venue." 924 A.2d at 651–52. The court explained that "[t]he availability of these reasonable alternatives minimizes the potential impact of public disclosure of the audiotape and weighs against a denial of access." *Id.*; *see also Fenstermaker*, 530 A.2d at 420 (cautioning courts considering requests to seal records in criminal cases that "in the usual case pretrial publicity does not automatically render a fair trial impossible").

While Media Intervenors can only guess as to the Court of Common Pleas' reasoning for sealing the records at issue, there is no evidence that concerns about pretrial publicity, or any other factor, could have warranted closure of these records.

[6] The DA's vague reference to "social media incidents" in its Motion to Allow Dissemination and Transcription bolster this interpretation. R.109a.

This is particularly so with respect to the May 2, 2025 Motion in Limine, the substance of which was extensively discussed in open court the day before it was filed under seal. It is well settled that when information has already been made public, that negates any interest that might have otherwise justified continued sealing of a document. *See, e.g.*, *Commonwealth v. Curley*, 189 A.3d 467, 475 (Pa. Super. Ct. 2018) (holding that sealing is inappropriate where "the specific details and much of the substance of the information [in sealed filings] has already been disclosed," and noting that "[a]s case law indicates, once evidence has been disseminated to the general public, it cannot be resealed; the cat is out of the bag, so to speak").

In considering whether to keep the records in this case under seal, the court was required to make "document-by-document findings" and not simply "issue[] a blanket conclusion." *Commonwealth v. Curley*, 189 A.3d 467, 473 (Pa. Super. Ct. 2018). The trial court's summary denial of the Motion to Intervene and Unseal without appearing to give any consideration that at least some of the information in the filings had already been publicly revealed underscores the need for this particularized analysis.

As the records are presumptively public (and one was displayed and discussed in great depth in open court), and no concern clearly outweighs Media Intervenors' right to access them, the Court of Common Pleas erred in denying Media Intervenors' motion to unseal.

III. In the alternative, if the presumption of access is overcome as to any judicial record, sealing must be narrowly tailored and supported by specific findings on the record.

Media Intervenors have established that they have a presumptive right of access to the sealed docket entries and that no interest has overcome this right such that sealing was warranted. In the alternative, Media Intervenors also assert that any records that were properly closed due to a countervailing interest were required to be closed in such a way that the restrictions to access were narrowly tailored and supported by specific findings on the record. *See Press-Enter. Co. v. Super. Ct. of Cal., Riverside Cnty.*, 464 U.S. 501, 510 (1984); *Commonwealth v. Buehl*, 462 A.2d 1316, 1322 (Pa. Super. Ct. 1983).

This court has held that a party that establishes a compelling government interest justifying closure must achieve that closure only by "a means narrowly tailored to serve that interest." *In re M.B.*, 819 A.2d 59, 63 (Pa. Super. Ct. 2003). In *Commonwealth v. Long*, for example, the Pennsylvania Supreme Court balanced competing right of access and privacy interests in holding that jurors' names could be disclosed to the public, but not their addresses. 922 A.2d 892, 905 (2007). In *Press-Enterprise Co.*, Justice Marshall stated in his concurrence to the U.S. Supreme Court majority opinion that redaction is "the constitutionally preferable method for reconciling the First Amendment interests of the public and press with the legitimate

privacy interests of jurors and the interests of defendants in fair trials[.]" 464 U.S. 501 at 520.

Here, if the presumption of access were overcome by compelling interests, redaction or an equally narrow restriction on the public's right of access to the sealed documents would be appropriate, rather than wholesale sealing until the completion of trial.

Further, any restriction on the public's right of access to judicial records—whether those restrictions be narrow redactions or wholesale sealing—must be supporting by findings stated on the record. Such findings have yet to be provided in this case, despite case law from the U.S. Supreme Court, the Third Circuit, and Pennsylvania state courts finding that failure to provide such reasoning is clear legal error. *Press-Enter. Co.*, 464 U.S. at 515 ("Even assuming the existence of a juror's privacy right, the trial court erred in failing to articulate specific findings justifying the closure of the *voir dire* and the refusal to release the transcript."); *United States v. Criden*, 675 F.2d 550, 560 (3d Cir. 1982) ("The district court also erred in closing both the . . . hearings by not articulating its consideration of alternatives to closure on the record. There is a fairly broad consensus that, before a court closes a pretrial criminal hearing, it must at least consider alternatives to closure and explicitly state its reasons on the record for rejecting such alternatives."); *Long*, 922 A.2d at 906

("The trial court did not make any specific findings in this case. Accordingly, the refusal to disclose the jurors' names was unwarranted.").

Should the court find that the public's presumptive right of access to the sealed records at issue was overcome by a compelling interest, any narrowly-tailored access restriction must be supported by specific factual findings on the record—a requirement that was erroneously absent in the instant case.

CONCLUSION

For the reasons set forth above, Media Intervenors respectfully request that this Court vacate the Court of Common Pleas' order denying their motion to intervene and unseal.

Dated: October 20, 2025

Respectfully submitted,

/s/ Paula Knudsen Burke

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Counsel for Media Intervenors

CERTIFICATES OF COMPLIANCE

I hereby certify that:

This filing complies with the word count limit set forth in Pennsylvania Rule of Appellate Procedure 2135(a)(1). Based on the word-count function of Microsoft Word, the filing contains 6549 words.

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.

Dated: October 20, 2025

/s/ Paula Knudsen Burke

Paula Knudsen Burke
Pa. Bar ID No. 87607
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS

CERTIFICATE OF SERVICE

I certify that on this 20th day of October, 2025 I caused a true and correct copy of the foregoing document to be served by email and PACFile on the following:

District Attorney Pier Hess Graf
Lebanon County District Attorney's Office
400 South Eighth St., Room 11
Lebanon, PA 17042
Counsel for the Commonwealth

Ian Means Ehrgood
410 Chestnut St.
Lebanon, PA 17042
Counsel for Defendant

Joseph A. Crowe
525 South Eighth St.
Lebanon, PA 17042
Counsel for Kristina Kolb and Diana Kolb

/s/ Paula Knudsen Burke
Paula Knudsen Burke
Pa. Bar ID No. 87607
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS

EXHIBIT A

IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA,

v.

VERONIKA RODRIGUEZ
DEFENDANT

No. CP-38-CR-430-2023

ENTERED & FILED
CLERK OF COURTS
LEBANON, PA
MAY 19 A 10:05

[PROPOSED] ORDER

AND NOW, this 19th day of May, 2025, upon consideration of the Media Intervenors' Contested Motion to Intervene and Unseal it is **ORDERED** as follows:

1. After consideration of arguments from the Commonwealth, Defense and counsel for any interested parties, the Court HEREBY finds that the Motion is Denied ~~GRANTED~~ in full;

2. Media Intervenors' motion to intervene is Denied ~~GRANTED~~;

3. Media Intervenors' motion to unseal the three sealed docket entries is Denied ~~GRANTED~~;

4. The Lebanon County Clerk of Courts is **HEREBY ORDERED** to immediately unseal the three sealed docket entries and make all filings available for public view, upon completion of the trial.

Charles T. [illegible], J.

EXHIBIT B

Received 5/28/2025 1:39:34 PM Superior Court Middle District

SUPERIOR COURT OF PENNSYLVANIA
Criminal Docketing Statement

Filed 5/28/2025 1:39:00 PM Superior Court Middle District
662 MDA 2025

Pursuant to Pa.R.A.P. 3517, you *must* complete and return this form and attachments to the Prothonotary of the Superior Court by June 06, 2025. A completed copy of this form *must* also be provided to the appellee. THIS FORM IS FOR **CRIMINAL** APPEALS ONLY, as indicated on the trial court docket and/or order from which you are appealing.

FAILURE TO COMPLETE THIS DOCKETING STATEMENT IN ITS ENTIRETY IN A TIMELY MANNER WILL RESULT IN DISMISSAL OF THE APPEAL.

A. CASE IDENTIFICATION

1. Case Caption: Com. v. Rodriguez, V.
2. Superior Court Docket No: 662 MDA 2025
3. Trial Court Docket Number: CP-38-CR-0000430-2023
4. Party filing appeal: LebTown, PennLive, LNP Media Group, Inc. and WITF
5. Type of Order (Check one): [ ] Judgment of Sentence [ ] PCRA [✔] Other

B. TIMELINESS OF APPEAL (answer **ONLY** those which apply to the present appeal and fill in the date(s))

1. Notice of appeal filed — Date 5/19/25
2. Type of Order being appealed

a. Judgment of Sentence/Juvenile Disposition

Judgment of sentence/Juvenile Disposition order — Date _____
IF post-sentence motions were filed — Date _____
Post-sentence motions were decided — Date _____

The judgment of sentence was imposed following? (check applicable response):

[ ] Guilty/Nolo Contendere Plea
[ ] Jury Trial/Bench Trial
[ ] Summary Conviction
[ ] Summary Appeal
[ ] Probation/Parole Revocation

b. Post Conviction Relief Act (PCRA)

Post Conviction Relief Act petition decided — Date _____

c. Other

Describe type of order (Pre-trial suppression, return of property, etc.)
Order denying Media Intervenors' motion to intervene and unseal — Date 5/19/25

C. FINALITY OF ORDER APPEALED

1. Is the order appealed from a final order? ☑ Yes ☐ No

   Check **ONLY** the Rule that pertains to the present appeal

   ☐ Pa.R.A.P. 301 Requisites for an Appealable Order
   ☐ Pa.R.A.P. 311 Interlocutory Appeals as of Right
   ☐ Pa.R.A.P. 313 Collateral Orders
   ☑ Pa.R.A.P. 341 **F**inal Orders
   ☐ Other (if applicable, provide Miscellaneous Docket Number) _____

2. **IF this is a Commonwealth appeal** from a pretrial order, has the Commonwealth complied with Pa.R.A.P. 311(d)? ☐ Yes ☐ No

D. RELATED CASE

List all related cases pending in this court (for example: co-defendants, cross appeal, etc.):

Case Caption **Superior Court Docket No.** **Trial Court Docket No.**

(**E**x: Com v. Smith, 123 **E**DA 1997, CP-51-CR-1234567-1997)

E. DESCRIPTION OF APPEAL

1. **Brief** description of action and result below:

   Motion to Intervene/Unseal filed May 19, 2025 and denied in full by judge.

2. Issues to be raised on appeal:

   see attached Concise Statement of Errors Complained of On Appeal

3. If proceeding *pro se*, list all prior counsel in the instant case:

4. **IF you are incarcerated and *pro se***, does the application of the prisoner mailbox rule make this appeal timely?

   ☐ Yes ☐ No. If yes, explain why and attach any supporting evidence.

HAVE YOU ATTACHED: Order from which appeal is taken? ☑ Yes ☐ No

Notice of appeal? ☑ Yes ☐ No

Signature s/Paula Knudsen Burke **E**-Mail Address pknudsen@rcfp.org

Print Name Paula Knudsen Burke Atty. I.D. No. 87607

Address 4000 Crums Mill Road, Ste 101 Date 5/28/25

Harrisburg PA 17112

IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA,	:	
	:	**No. CP-38-CR-430-2023**
v.	:	
	:	
VERONIKA RODRIGUEZ	:	
DEFENDANT		

CONCISE STATEMENT OF THE ERRORS COMPLAINED OF ON APPEAL

Pursuant to this Court's order of May 19, 2025, Appellants/Media Intervenors file this Concise Statement of the Errors Complained of On Appeal. *See* Order, *Commonwealth v. Rodriguez*, (Ct. of Common Pleas of Lebanon Cnty., May 19, 2025). Appellants anticipate seeking review of the following errors related to the Court's final judgment:

The Court erred in denying Appellants' motion because the judicial records that are the subject of the instant appeal are presumptively public, but appear to have been sealed without any party asserting a good cause basis for sealing, and without any public court order making findings in support of sealing the material from the public. Hence, the Court's denial of Appellants' motion constitutes error because the First Amendment and common law requirements that ensure judicial records are open to the public were not met in this case, rendering the sealing of the records at issue improper. In so denying Appellants' motion, the Court:

1. Did not heed the presumption of openness of judicial records guaranteed by the common law; *see* Mem. of L. in Supp. of Media Intervenors'

Mot. to Intervene & Unseal. The trial court erred as a matter of law in when it denied Media Intervenors' motion to unseal docket entries, which are presumptively public. *See, e.g.*, *United States v. Smith*, 123 F.3d 140, 147 (3d Cir. 1997); *Commonwealth v. Upshur*, 924 A.2d 642, 647 (Pa. 2007); *Commonwealth v. Fenstermaker*, 530 A.2d 414, 420 (Pa. 1987); *Commonwealth v. Selenski*, 996 A.2d 494, 496 (Pa. Super. 2010). Where, as here, the presumption of access to judicial records and proceedings attaches, the party seeking closure bears the burden to overcome that presumption, and the court must make specific on-the-record findings justifying closure, and explain their consideration and rejection of less-restrictive alternatives. *See Upshur*, 924 A.2d at 651–52. The trial court acted improperly when it sealed the docket entries without a public order. The trial court also erred by failing to explain why sealing such records was necessary and by failing to explain its consideration of less-restrictive alternatives such as targeted redaction.

2. Did not heed the presumption of openness of judicial records guaranteed by the First Amendment to the U.S. Constitution, *see id*; and
3. Did not contend with the established prerequisites for sealing court records—i.e., on the record findings that a document should be withheld from the public notwithstanding the aforementioned presumption of access—as to the instant settlement records, *see id*.
4. Erred as a matter of law when it denied Media Intervenors' motion to intervene for the limited purpose of seeking access to sealed judicial

records. Intervention is the proper procedure for members of the news media to challenge access restrictions, as Media Intervenors seek to do in this case. *See Commonwealth v. Long*, 922 A.2d 892, 895 n.1 (Pa. 2007). The trial court improperly denied the motion to intervene without any explanation, seemingly on the flawed basis that because the court intended to deny the relief sought—unsealing—intervention should also be denied.

Respectfully submitted,

Dated: May 27, 2025

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ORDER FROM WHICH APPEAL IS TAKEN

IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA,

v.

VERONIKA RODRIGUEZ
DEFENDANT

No. CP-38-CR-430-2023

ENTERED & FILED
CLERK OF COURTS
LEBANON, PA
MAY 19 A 10:05

[PROPOSED] ORDER

AND NOW, this 19th day of May, 2025, upon consideration of the Media Intervenors' Contested Motion to Intervene and Unseal it is **ORDERED** as follows:

1. After consideration of arguments from the Commonwealth, Defense and counsel for any interested parties, the Court HEREBY finds that the Motion is Denied ~~GRANTED~~ in full;

2. Media Intervenors' motion to intervene is Denied ~~GRANTED~~;

3. Media Intervenors' motion to unseal the three sealed docket entries is Denied ~~GRANTED~~;

4. The Lebanon County Clerk of Courts is **HEREBY ORDERED** to immediately unseal the three sealed docket entries and make all filings available for public view, upon completion of the trial.

Charles T. [illegible], J.

IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA, : No. CP-38-CR-430-2023

v. :

VERONIKA RODRIGUEZ :
DEFENDANT

NOTICE OF APPEAL

Notice is hereby given that LebTown, PennLive, LNP Media Group, Inc. and WITF (collectively, "Media Intervenors") hereby appeal to the Superior Court of Pennsylvania from the order entered in this matter on the 19th day of May, 2025. *See* Exhibit A.

This order has been reduced to judgment and entered in the docket as evidenced by the attached copy of the docket entry. *See* Exhibit B and A (docket is updated through submission of the Motion to Intervene and Unseal; however, at the time of this filing with the Lebanon County Clerk of Courts for transfer to the Superior Court, the Lebanon County Court of Common Pleas docket has not been updated to show the entry of the May 19, 2025 Order).

Respectfully submitted,

Dated: May 19, 2025

/s/
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Counsel for Media Intervenors

CERTIFICATE OF COMPLIANCE

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

Submitted by: */s/Paula Knudsen Burke*
PA Attorney ID: 87607

Paula K Burke 5/19/25

CERTIFICATE OF SERVICE

Pursuant to Pennsylvania Code Rule 906(a), the instant Notice of Appeal has been served upon the following parties to this case, via hand-delivery and electronic mail on May 19, 2025:

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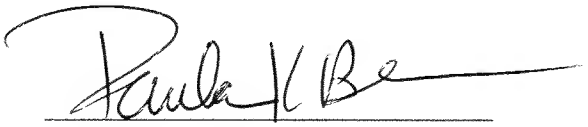
Counsel for Kristina Kolb and Diana Kolb

I also served the instant Notice upon the following via hand-delivery to chambers:

The Honorable Charles T. Jones, Jr.
Lebanon County Court of Common Pleas
Room 311, Municipal Building
400 South 8th Street
Lebanon, PA 17042

Date: May 19, 2025



Paula Knudsen Burke (PA ID: 87607)