

TOM LISI and LNP LANCASTERONLINE v. SUSQUEHANNA REGIONAL POLICE DEPARTMENT	IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY CIVIL ACTION – MANDAMUS NO. _____
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COMPLAINT IN MANDAMUS

Plaintiffs, Tom Lisi and LNP | LancasterOnline (hereinafter, “Requesters”), by and through their undersigned counsel, file this Complaint in Mandamus against the Defendant pursuant to the Pennsylvania Rules of Civil Procedure § 1091, seeking to enforce the final determination issued by the Office of Open Records (hereinafter, “OOR”) on March 25, 2026. In support thereof, Requesters aver as follows:

1. On February 2, 2026, Tom Lisi, a news reporter for the print and online news publication LNP | LancasterOnline, filed a request with the Susquehanna Regional Police Department (hereinafter, “Department”) pursuant to the Right to Know Law (RTKL), 65 P.S. §§ 67.101 *et seq.* The request sought “copies of costs submitted by [the Department] for reimbursement from U.S. Immigration and Customs Enforcement under the 287(g) program” from January 1, 2025 to February 2, 2026. *See* attached, Exhibit A.
2. On February 11, 2026, after receiving no response from the Department, Lisi appealed to the OOR as a “deemed denial.” *See* attached, Exhibit A.
3. On March 25, 2026, after receiving no response or participation from the Department, the OOR issued its final determination, granting the appeal and requiring the Department to provide the requested records to Requesters within thirty days. *See* attached, Exhibit B.

4. Either party is permitted to take an appeal from OOR to the Court of Common Pleas within 30 days. 65 P.S. § 67.1301(a).
5. Thirty days passed from the issuance of the OOR's final determination and the Department did not file an appeal with the Court of Common Pleas.
6. Despite the issuance of a final determination directing the Department to provide records and its failure to appeal to the Court of Common Pleas, the Department has not provided the Requesters with the sought-after records.
7. The proper recourse for Requesters, as detailed by the Commonwealth Court, is to file an action in mandamus. *See Capinski v Upper Pottsgrove Tw*, 164 A.3d 601, 609 (Pa. Cmmwlth. Ct. 2017).
8. Venue is proper in Lancaster County since the Defendant is located within this county at a business address of Susquehanna Regional Police Department, 188 Rock Point Road Marietta, Pa 17547.
9. Requesters have a clear legal right to the documents and the Department has a mandatory statutory obligation to produce them as the OOR issued a final determination and there has been no appeal filed.
10. The Plaintiffs have no other remedy at law other than the present action in mandamus.

WHEREFORE, Plaintiffs respectfully request this Honorable Court:

- a) Issue a Writ of Mandamus ordering the Defendant provide the Plaintiffs the documents as granted by the Office of Open Records; and
- b) Award attorney fees and costs; and
- c) Grant such other relief as is just and appropriate under the circumstances

Dated: August 19, 2026

Respectfully submitted,

/s/ Paula Knudsen Burke

Paula Knudsen Burke

Pa. I.D.: 87607

REPORTERS COMMITTEE FOR FREEDOM OF
THE PRESS

4000 Crums Mill Road, Suite 101

Harrisburg, PA 17112

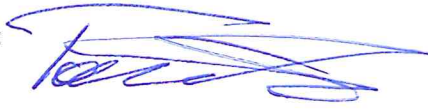
pknudsen@rcfp.org

*Attorney for Tom Lisi and LNP |
LancasterOnline*

VERIFICATION

I, Tom Lisi, hereby state that the facts set forth above in the Complaint in Mandamus are true and correct to the best of my knowledge, information and belief and that 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).

Signature:



Date:

8/19/2020

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:

Date: August 19, 2026

Signature: /s/ Paula Knudsen Burke

PA Attorney ID No.: 87607

AFFIDAVIT REGARDING GENERATIVE ARTIFICIAL INTELLIGENCE

I, the signatory, hereby attest that no portion of this filing has been drafted by AI tools (like ChatGPT, Claude, etc.).

I further attest that a human being has checked for accuracy all quotations, citations, facts and statements, and legal analysis.

I understand that by signing this filing, I will be held responsible for the contents thereof, and if I am an attorney, I am subject to the applicable rules of attorney discipline, regardless of whether generative Artificial Intelligence drafted any portion of this filing.

I declare under penalty of perjury pursuant to the law of the Commonwealth of Pennsylvania, 18 Pa.C.S.A. § 4904, Unsworn Falsification to Authorities, that the foregoing is true and correct.

Date: August 19, 2026

/s/Paula Knudsen Burke

Paula Knudsen Burke (No. 87607)
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
4000 Crums Mill Rd., Ste. 101
Harrisburg, PA 17112 (717) 370-6884
pknudsen@rcfp.org

EXHIBIT A

From: no-reply@openrecordspennsylvania.com
To: tlisi@lnpnews.com
Subject: [External] PA Office of Open Records - Appeal Confirmation
Date: Wednesday, February 11, 2026 11:05:41 AM
Attachments: [oor_logo_email.png](#)

ATTENTION: This email message is from an external sender. Do not open attachments or click links from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).



You have filed an appeal of an agency's response to a request for records under the Right-to-Know Law.

Name:	Tom Lisi Tom Lisi
Company:	LNP Media Group
Address 1:	PO Box 1328
Address 2:	
City:	Lancaster
State:	Pennsylvania
Zip:	17608
Phone:	717-719-0558
Email:	tlisi@lnpnews.com
Email2:	tlisi@lnpnews.com
Agency (list):	Susquehanna Regional Police Department
Agency Address 1:	188 Rockpoint Road
Agency Address 2:	
Agency City:	Marietta
Agency State:	Pennsylvania

Agency Zip:	17547
Agency Phone:	717-426-1164
Agency Email:	sosnoskl@srpd27.com
Records at Issue in this Appeal:	Copies of costs submitted by Susquehanna Regional Police for reimbursement from U.S. Immigration and Customs Enforcement under the 287(g) program. Search can be confined to the time period January 1, 2025 to February 2, 2026.
Request Submitted to Agency Via:	web form
Request Date:	02/02/2026
Response Date:	
Deemed Denied:	Yes
Agency Open Records Officer:	Not Provided
Attached a copy of my request for records:	Yes
Attached a copy of all responses from the Agency regarding my request:	Yes
Attached any letters or notices extending the Agency's time to respond to my request:	Yes
Agree to permit the OOR additional time to issue a final determination:	No
Interested in resolving this issue through OOR mediation:	Yes
Attachments:	• susq_RTK_confirm.pdf

I requested the listed records from the Agency named above. By submitting this form, I am appealing the Agency's denial, partial denial, or deemed denial because the requested records are public records in the possession, custody or control of the Agency; the records do not qualify for any exemptions under § 708 of the RTKL, are not protected by a privilege, and are not exempt under any Federal or State law or regulation; and the request was sufficiently specific.



SUSQUEHANNA REGIONAL POLICE DEPARTMENT

Lancaster County Prothonotary E-Filed - 19 Aug 2026 05:15:16 PM
Case Number: CI-26-06317

Thank you, your submission has been received.

If you are reporting a crime in progress or require emergency service, dial [911](#) immediately.

RETURN TO FORM

Susquehanna Regional PD

188 Rock Point Rd
Marietta, PA 17547

English

Contact Susquehanna Regional PD

Compliance

Terms & Conditions

Privacy Policy

Accessibility

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SUSQUEHANNA REGIONAL POLICE DEPARTMENT

Lancaster County Prothonotary E-Filed - 19 Aug 2026 05:15:16 PM
Case Number: CI-26-06317

EXHIBIT B

FINAL DETERMINATION

DATE ISSUED AND MAILED: March 25, 2026

IN RE: *Tom Lisi and LNP Media Group v. Susquehanna Regional Police Department*, OOR Dkt. AP 2026-0564

On February 2, 2026, Tom Lisi, a reporter for LNP Media Group (collectively “Requester”) submitted a request (“Request”) to Susquehanna Regional Police Department (“Department”) pursuant to the Right-to-Know Law (“RTKL”), 65 P.S. §§ 67.101 *et seq.*, seeking, “copies of costs submitted by [the Department] for reimbursement from U.S. Immigration and Customs Enforcement under the 287(g) program” from January 1, 2025 to February 2, 2026. The Department did not respond within five business days of receiving the Request, and therefore, the Request was deemed denied on February 9, 2026. 65 P.S. § 67.901. On February 11, 2026, the Requester filed an appeal with the Office of Open Records (“OOR”).¹

Local agencies have the burden of proving that records are exempt from access. 65 P.S. § 67.708(a)(1). Here, the Department did not comply with the RTKL by timely responding to the Request, nor did the Department participate on appeal by submitting legal argument or evidence in support of withholding records.² Accordingly, the Department did not meet its burden of proof under the RTKL. 65 P.S. § 67.305.

For this reason, the appeal is **granted**, and the Department is required to provide the requested records to the Requester within thirty days, or, in the alternative, a sworn affidavit or a statement made under the penalty of perjury demonstrating that records do not exist. Failure to comply with this Final Determination may result in the imposition of court costs, attorney fees, or civil penalties by a reviewing court. Within thirty days of the mailing date of this Final Determination, either party may appeal or petition for review with the Lancaster County Court of Common Pleas. 65 P.S. § 67.1302(a). All parties must be served with notice of the appeal. The OOR also shall be served notice and have an opportunity to respond according to court rules as per 65 P.S. § 67.1303. However, as the quasi-judicial tribunal adjudicating this matter, the OOR is not a proper party to any appeal and should not be named as a party.³ All documents or communications following the issuance of this Final Determination shall be sent to oor-postfd@pa.gov. This Final Determination shall be placed on the OOR website at: <http://openrecords.pa.gov>.

¹ On February 12, 2026, the OOR notified the Requester that the appeal was deficient, as the appeal did not include a complete copy of the Request. *See* 65 P.S. § 67.1303(b). On February 20, 2026, the Requester cured the appeal by providing a complete copy of the Request, which has been made part of the record.

² On March 16, 2026, the OOR further extended the filing deadline to allow the Department to submit any evidence on appeal to develop the record. To date, the Department has not submitted any evidence.

³ *Padgett v. Pa. State Police*, 73 A.3d 644, 648 n.5 (Pa. Commw. Ct. 2013).

Issued by:

/s/ Tope L. Quadri

APPEALS OFFICER
TOPE L. QUADRI, ESQ.

Sent via portal to: Tom Lisi; Lieutenant L. Jeffrey Sosnoski, AORO