

SUPREME COURT OF PENNSYLVANIA
WESTERN DISTRICT

Joe Myers, **PETITIONER**

vs.

Timothy F. McCune, Joseph H. Chivers, John/Jack Murtagh Jr., Graydon Brewer, Carl V. Nanni, Jack Lewis, Jim Gallagher, Hank Leyland, Greg Loverick, Edward Tasse, AK Steel (now Cleveland Cliffs) et al, UAW (formerly Butler Armco Independent Union) et al, Angelo Papa, William Cunningham, Michael Lettrich, Maria Millie Jones, Dennis Roman, Nicholas Koch, Adam Hobaugh, John T. Bender, Alice Beck Debow, Carolyn H. Nichols, Joseph D. Seletyn, Butler County et al, Richard A. Goldinger, Tim Morando, **RESPONDENTS**

Petitioner's Application for Permission to File 3-8-21

Notice is hereby given that Joe Myers, Petitioner named above, makes **Application for Permission to File** to the Supreme Court of Pennsylvania.

CIVIL DIVISION

Commonwealth Court No. 19-10516

Superior Court No. 1892 WDA 2019

Supreme Court No. 283 WAL 2020

Joe Myers

12137 Emerald Green Court

Jacksonville, FL 32246

904-254-6472

1776ToTyranny@gmail.com

PETITIONER'S APPLICATION FOR PERMISSION TO FILE

As in other court filings Petitioner provides **ALL**
INCULPATORY EVIDENCE and **court filings** on the
Timeline of CORRUPTION page on website
1776ToTyranny.com

Petitioner files this **Application for Permission to File**
to the **Supreme Court of Pennsylvania** to add **Respondent**
Butler County et al, Respondent Richard A. Goldinger
Butler County District Attorney and **Respondent Tim**
Morando Corporal of the Pennsylvania State Police for being
part of the CONSPIRACY against VIOLATING **Petitioner's**
CONSTITUTIONALLY PROTECTED RIGHTS of the United
States of America.

This court filing is response to the letter Petitioner received from the Prothonotary of the Pennsylvania Supreme Court, John Vaskov, dated 3-2-21.

The ***Petitioner's Application for Permission to File*** is to allow the recent court filing ***Petitioner's Notice of Appeal Addendum 2-23-21*** to be added to this case docket and add named Respondents since ***Respondents Goldinger and Morando*** refused to protect Petitioner's Constitutional Rights after Petitioner's Notice of Appeal to this court was filed and Petitioner's reason for this court filing.

ALL Respondents have been aware of the criminal actions against Petitioner presented in Petitioner's ***Concise Statement dated 2-4-20*** filed in Butler County Commonwealth Court as well as every other court filing by Petitioner.

Petitioner provided the evidence that ALL Respondents WERE AWARE OF and WARNED by Petitioner via email or certified letter in the recent court filing ***Petitioner's Notice of Appeal Addendum 2-23-21.***

These following court ***OPINIONS*** validate the responsibility and criminal and civil liability ***Respondent Butler County et al*** has when the County hires District Attorneys and judges that violate their Oath to uphold the Constitution and commit crimes as they are in the CONSPIRACY against Petitioner's Constitutionally Protected Rights. ***Respondent Butler County et al*** knew former Butler County District Attorney was ***Respondent Timothy McCune*** and that McCune ignored Petitioner's and Petitioner's then legal counsel letters that are **Exhibits 9 (appended) and 11 (appended)** in Petitioner's ***Concise Statement*** filed in Butler County Commonwealth Court.

Respondent McCune admits in his letter **Exhibit 31 (appended)** to Petitioner that he had received **Exhibit 11 and Exhibit 28 (appended)** from Petitioner which detailed the crime committed against Petitioner in "point 2" of **Exhibit 11**. Petitioner also detailed violations of the United States Codes against Petitioner in **Exhibit 28. Respondent McCune** had the responsibility as a District Attorney to find and examine all the evidence Petitioner provided in the **Concise Statement** YET HE DID NOT. Petitioner provided all the same evidence and **Concise Statement** to **Respondents Richard A. Goldinger** and **Corporal Tim Morando** and they refused to investigate and prosecute all involved which makes all Respondents criminally and civilly liable for being part of the CONSPIRACY against Petitioner's CONSTITUTIONALLY PROTECTED RIGHTS:

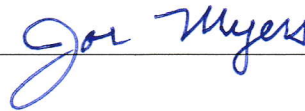
- *"It is the duty of all officials whether legislative, judicial, executive, administrative, or ministerial to so perform every official act as not to violate constitutional provisions."* – Williamson v. U.S. Department of

Agriculture, 815 F.2d. 369, ACLU Foundation v. Barr, 952 F.2d. 457, 293 U.S. App. DC 101, (CA DC 1991)

- *"An unconstitutional act is not law; it confers no rights; it imposes no duties; affords no protection; it creates no office; it is in legal contemplation, as inoperative as though it had never been passed."* – Norton v. Shelby County, 118 U.S. 425 (1886)
- *"The court is to protect against any encroachment of Constitutionally secured liberties."* – Boyd v. U.S., 116 U.S. 616
- *"If a law has no other purpose than to chill the assertion of constitutional rights by penalizing those who choose to exercise them, then it is patently unconstitutional."* – Shapiro v Thompson, 394 US 618, 22 L Ed 2d 600, 89 S Ct 1322.
- *"Decency, security, and liberty alike demand that Government officials shall be subjected to the same rules of conduct that are commands to the Citizen. In a Government of laws, existence of the Government will be imperiled if it fails to observe the law scrupulously. Our Government is the potent, the omnipresent teacher. For good or for ill, it teaches the whole people by its example. Crime is contagious. If the Government becomes a law-breaker, it breeds contempt for law; it invites every man to become a law unto himself. It invites anarchy. To declare that, in the administration of the law, the end justifies the means would bring a terrible retribution. Against that pernicious doctrine, this Court should resolutely set its face."* **Olmstead vs. U.S. 277 US 438, 48 S.Ct. 564, 575; 72 L ED 944 (1928)** Justice Louis Brandeis affirmed by his condemnation of abuses practiced by Government officials, who were defendants, acting as Government officials.

In light of the evidence provided by Petitioner the Pennsylvania Supreme Court **MUST** add **Respondents Butler County et al, Richard A. Goldinger** and **Tim Morando** to Petitioner's case before this court.

Dated this 8th day of March, 2021



Joe Myers

12137 Emerald Green Court

Jacksonville, FL 32246

Phone: 904-254-6472

Email: 1776ToTyranny@gmail.com

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: **PETITIONER**
(E.g., Appellant, Appellee, Petitioner, Respondent)

Signature: *Joe Myers*

Name: JOE MYERS

Attorney No. (if applicable): _____

CERTIFICATE OF COMPLIANCE

I hereby certify that this court filing complies with PRAP even though as Petitioner has stated in court filings the PRAP cannot supersede the Supreme Law of the LAND – the CONSTITUTION.

Petitioner puts the ***Supreme Court of Pennsylvania*** on **NOTICE** of your SWORN OATH to uphold the Constitution of the United States of America and ALL judges are bound thereby under Article 6 as well as the PREAMBLE to the Bill of Rights that further restrict judges, specifically 7th, 9th, 10th and 14th Amendments.

Additionally, each judge is bound by your OATH OF OFFICE under Pennsylvania Title 42 Chapter 25 Section 2522:

"I do solemnly swear (or affirm) that I will support, obey and defend the Constitution of the United States and the Constitution of this Commonwealth and that I will discharge the duties of my office with fidelity, as well to the court as to the client, that I will use no falsehood, nor delay the cause of any person for lucre or malice."

Dated this 8th day of March, 2021

/s/ Joe Myers

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Received by (Please Print Clearly)	B. Date of Delivery
	C. Signature X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: Mr. Bill Gonce, Manager Industrial Relations AK Steel Butler Works P.O. Box 832 Butler, PA 16003-0832	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
2. Article Number (Copy from service label) 7000 1670 0003 8073 3122		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952		

U.S. Postal Service
CERTIFIED MAIL RECEIPT
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OFFICIAL USE

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Return Receipt Fee <small>(Endorsement Required)</small>		
Restricted Delivery Fee <small>(Endorsement Required)</small>		
Total Postage & Fees	\$	

Sent To
 Bill Gonce / AK Steel Butler Works
Street, Apt. No., or PO Box No.
 P.O. Box 832
City, State, ZIP+4
 Butler PA 16003-0832

PS Form 3800, May 2000 See Reverse for Instructions

227E E40R E000 047E 0004
 7000 1670 0003 8073 3122

ATTORNEYS AT LAW

*SUITE 1240, LAWYERS BUILDING · 428 FORBES AVENUE · PITTSBURGH, PENNSYLVANIA 15219
TELEPHONE: 1-800-375-3089 · FAX: (412) 391-8232*

March 1, 2001

*PHILADELPHIA OFFICE
ASSOCIATED WITH
MATTLEMAN, WEINROTH & MILLER
ATTORNEYS AT LAW
PHILADELPHIA, PA 19110*

Mr. Bill Gonce, Manager
Industrial Relations
AK Steel Butler Works
P. O. Box 832
Butler, PA 16003-0832

VIA CERTIFIED MAIL

RE: Joseph Myers
Our File No.: 98404

Dear Mr. Gonce:

As manager of Industrial Relations at the plant, I wanted to put you on notice of safety concerns of one of the employees of AK Steel Butler Works, Joseph Myers.

Mr. Myers informs me that management of AK Steel has routinely requested that he haul steel coils in excess of CDL weight restrictions by tractor trailer within the plant. The gross weight of the trailer with the six coils he is asked to carry is far in excess of the maximum gross weight of 73,280 pounds specified in the Pennsylvania Motor Vehicle Code, Section 4941. See enclosed. Section 4941 specifies the maximum weight permitted when a vehicle is operated on a highway. "Highway" is defined in part as "[t]he entire width between the boundary lines of every way publicly maintained when any part thereof is open to the use of the public for purposes of vehicular travel." See enclosed definition. In addition to the weight restrictions, the steel cargo is not chained down on the trucks. This creates a foreseeable risk of danger.

As a result of refusing to carry a load in excess of the CDL regulations, Mr. Myers was called to a disciplinary meeting with Ed Tasse, his supervisor. It is Mr. Myers contention that there are serious safety concerns in hauling these excess loads, especially without chaining down the loads properly. In the unfortunate event of a collision with another vehicle, someone could be seriously injured by rolling coils. There is also a question of his potential criminal liability for hauling loads in excess of the statute. If someone is injured, he also faces civil liability. It is unclear whether the commercial insurance on the trucks would fully cover him.

Mr. Bill Gonce, Manager

March 1, 2001

Page 2

Despite numerous requests, AK Steel refuses to put in writing their policy of hauling excess loads. The company is motivated to save time and money; however, is not willing to commit to their position in writing. At the same time, they take a hard-line approach toward safety infractions. Many employees are fired for the smallest safety infraction. It is conceivable that Mr. Myers would be fired for the safety violations in the event of an accident.

I understand that it is AK Steel's position that the plant constitutes private property. Therefore, they contend that the statute is not applicable. Obviously, it is a gray area that is uncertain. The state had previously given funds for the railroad crossings within the plant. These crossings had to be according to state specifications. This implies that the State may see it differently.

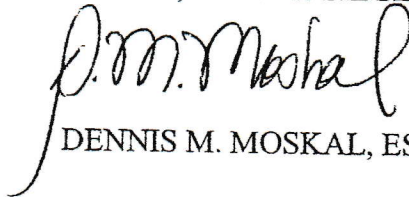
It is requested that the company have the Department of Transportation determine whether the CDL regulations are applicable within the plant. Furthermore, the company should commit in writing to indemnify and hold these trailer operators harmless for any injury to persons or damage to property resulting from hauling excess, unsecured loads.

It is requested that a written response be submitted within ten (10) days of this letter.

Thank you for your prompt attention to this matter.

Sincerely,

WELCH, GOLD & SIEGEL, P.C.



DENNIS M. MOSKAL, ESQUIRE

DMM/slb

cc: Richard Wardrup, CEO
703 Curtis Street
Middletown, OH 45043

Mr. Joseph Myers
147 Heather Drive
Butler, PA 16001

March 21, 2001

UNION EXHIBIT 2^{7(k)}

Mr. Dick Wardrup (CEO), Mr. Bill Gonce (Industrial Relations), Mr. Tom Ayres (Area Supv.), Mr. Rick Winter (Human Relations), Mr. Ed Tassey (Truck Supv.), Mr. Bill Smith (Safety Dept.)

Exhibit 11

I, Joe Myers, am serving notice to all those listed above regarding many incidents of inconsistent and selective discipline as well as possible criminal and civil liabilities being forced on hourly workers at the AK Butler Works. The selective discipline is a retaliation measure by the Company due to an employee standing up for his or her rights or a personality conflict.

This is a list of issues I believe the company has used in retaliation against me:

- 1) February 25, 1998: grievance No. BU-98-024 was filed because the company did not follow the contract. This grievance concerned a bid that I signed to obtain a position in the truck section. I will supply any documentation on this matter at the company's request. (Rick Winter governed this process)
- 2) July 9, 1998: I was issued a written verbal warning for not securing the load on a stake truck. The load that I did not secure was a pinion gear. Approximately two years prior, another truck driver was told by the machine shop not to chain down the pinion gear because they did not want any damage from the chains. During this time, Tom Ayres and I had discussions on overloaded coil trucks and the company not allowing the drivers to chain down the coils and Tom stated that was the company's decision. We also discussed other drivers having the same problems with hauling the pinion gear and Tom stated he was not responsible for what happened before he became the supervisor. After my incident, I was told of a prior accident involving Dan Redick, in which the pinion gear shifted and tilted the rear truck axle off the ground. At that point, management documented the incident, even taking photographs. However, if the pictures had been utilized in safety instructions attached to the pinion gear (which I suggested to Tom Ayres after my accident), the accident would NOT have happened to me. The company was and is negligent in not educating new drivers about this problem. Tom Ayres, Ed Tassey and Bill Smith questioned why I did not bid out of the truck section.
- 3) Ed Kamerer was discharged approximately February 1999 creating a vacancy that enabled me to obtain a daylight truck bid. I obtained the bid. The company then reinstated Ed Kamerer approximately five months later and put me back on midnight shift which was in direct violation of the contract that states a person who signs a bid cannot return to his relative position after 35 days. The bid that the company posted was a permanent bid and not a contingent bid that the company has posted in the past.
- 4) July 28, 2000: I received a letter issuing me a three-day suspension for not following General Safety Order No. 3. The letter stated, "this blatant and irresponsible disregard for safety requirements cannot be tolerated." I believe the statement ("blatant and irresponsible disregard") is defamation of character because, although I called for clearance but forgot the cone and derail, I did not do so intentionally. Also, I believe I was singled out because I was just one of several men who also did not follow GSO #3 on that day - but I was the only one to get suspended. Furthermore, the derail we are required to use is only effective up to three miles an hour. I know of two instances where a yard crane and a locomotive both went through a derail and it did not derail either one.

The following issues are the double standards the company uses with hourly vs. salary

- 1) I received a three-day suspension for not following GSO #3, but Dean Widenhofer and other salary employees were all on a railroad car without calling for clearance or coning and derailling - and nothing was done.

2) Approximately January 2000, the locomotive shop during routine inspection observed the 25-ft. boom extension on the Linkbelt mobile crane was bent, so they red tagged and pulled it out of service. The company put the boom extension back in service and continued to have the operators use the crane even after I had notified Tom Ayres and Ed Tassej on numerous occasions. The boom extension was not repaired until approximately December 2000.

3) The Grove 319 crane I have turned in for faulty rear steering is still being used and I have been told to continue to use it – even though they cannot seem to find the problem.

4) I've been called in by Ed Tassej and Bill Gonce because I hauled according to the legal limit that the trucks are licensed for and was told that if I didn't do what I was told I could subject myself to discipline up to and including discharge. The company issued me a written verbal awarding for not securing a load on July 9, 1998. They are now telling me to haul overloaded according to CDL and I'm not allowed to chain the coils down. This has the potential for civil and/or criminal liability. The company is not willing to produce a legal document indemnifying the driver from any such liability. (Compare this to AK's policy requesting outside trucks to indemnify AK of any damage liability when our equipment operators remove scrap from outside trucks while dumping.) AK's own insurance company (with whom I spoke) said that drivers should have a document stating that the company requires us to ignore CDL regulations because the company's insurance might not cover us.

5) The Labor Department had three crews report to the same jackhammer job where all three crews hit live conduit before the company determined the prints used on the job were the wrong ones. This is another case where nothing happens to management, but hourly personnel that do something wrong receive disciplinary action.

6) AK has implemented non-smoking policies, stating that violators could be subject to disciplinary action – yet Mr. Wardrup has been observed smoking in non-smoking buildings in violation of company policies and federally mandated non-smoking regulations.

This is to notify the company that I will be following state regulations as mandated by CDL regulations. I hold all named legally liable for all issues in this document – violation of my contractual rights, harassment and intimidation by the company meant to coerce me into violating CDL regulations, as well as any future criminal or civil liability as pertaining to CDL violations ordered by AK Steel.

Signed,



Joseph Myers

cc: Welch, Gold & Siegel, P.C., Attorneys At Law
Butler Armco Independent Union
PA DOT
EEOC
OSHA

Exhibit 28

147 Heather Drive
Butler, PA 16001-2819
November 29, 2001

Office of District Attorney
Mr. Tim McCune
P.O. Box 1208
Butler, PA 16003-1208

Re: An alleged illegal policy at AK Steel, Butler, PA

Dear Mr. McCune:

I am writing to you regarding a phone conversation that I had with Mr. David Devries of the PA Attorney General's office on October 31, 2001. During that conversation, he instructed me to contact your office to request an investigation into a seriously dangerous and potentially criminal policy at AK Steel's Butler works.

AK Steel has a current policy requiring all of its in-plant tractor-trailer drivers to haul overloaded trucks with unsecured loads throughout the plant, in violation of PA Motor Vehicle Code. A former employee, I was fired in March of 2001 for wanting to follow state motor vehicle code (as defined by §4942 of the vehicle code, which addresses registered gross vehicle weights).

AK's defense for requiring overloaded hauling is their claim that this hauling is done solely in-plant and not over a highway. However, while preceding motor vehicle code sections (§4941 and §4901) use the phrasing, "operated upon a highway" and "operated or moved upon any highway," respectively, §4942 does not refer to only a highway situation, per se.

AK's rationale for not securing these loads is to avoid damaging the steel coils. Yet when independent truck drivers ship these same products outside the plant, the loads are chained or strapped down when being hauled to customers or to another finishing plant. There are ways to secure the products without damage.

After numerous contacts with the DOT, OSHA, PA State Police, several attorneys, Hartford Casualty Insurance Co. (AK Steel's insurance carrier who advised me to seek indemnification), I was advised against following AK's orders to commit an illegal act in violating state motor vehicle code.

Not only are AK's drivers being forced to assume criminal and civil liability in the event of a serious accident involving loss of life or limb, but they are also being forced to jeopardize their own safety and that of their fellow employees. (Ironically, with A-K's recent commendation from OSHA, its Star Designation for Safety, AK is now exempt from random OSHA inspections.)

This is a very real, ongoing danger. Accidents such as this have already occurred several times at AK, both inside and outside the plant (with even chained loads). It is only a matter of time before this dangerous practice results in a serious injury or fatality. According to the attorneys I have dealt with, a driver is ultimately responsible because he committed the act of driving the truck.

- ✓ For your reference: coils of steel are approximately 3 to 6 feet high, 2 ½ to 4 ½ feet wide and can weigh from 4 to 25 tons each. These are not small objects, and they require the use of an overhead crane to load and unload them from tractor-trailers.
- ✓ A shifting load (like during sudden braking and swerving to avoid an accident) or equipment failure (such as the breakdown of a trailer or its tractor) could easily cause coils to roll off a truck and instantly kill an innocent bystander. Even someone within another vehicle would be crushed.

My case is currently in arbitration, and a decision from the arbitrator is to be rendered within a few days – with reference to my reinstatement and back pay only.

However, since the arbitrator can only rule on labor law and not criminal or civil law, there is a need for a criminal investigation into this matter. *AK has not and will NOT change its policies unless a legal ruling forces them to do so.*

In addition to forcing all of its Transportation Department personnel to violate state motor vehicle code, I believe AK may also have violated the following against me:

- U. S. Code: Title 18 Section 241/Conspiracy against rights
- U. S. Code: Title 18 Section 245/Federally protected activities (b)(1)(B)
- U. S. Code: Title 18 Section 3559/Sentencing classification of offenses (c)(2)(C)
- Constitution of Pennsylvania; Article IX, Sections 1 and 2
- Tort of Retaliatory Discharge

After my phone conversation with Mr. Devries in October, he advised me to contact your office, and I was directed to the magistrate's office without being allowed to talk with a detective. After going to the magistrate's office, I was told that my situation was a criminal matter and I was directed back to the District Attorney's office. When I came back to your office, I was not permitted to see a detective and was told to find a private attorney.

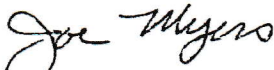
I then called Mr. Devries's office back and was told to contact Julie Graham, Butler County Solicitor. After hearing of this case, Ms. Graham believed an investigation is warranted. She directed me to put everything in writing and fax and mail it to your office for investigation.

In the mailed version of this letter, you will find a copy of the union's closing brief, for your perusal. At your request, I will provide copies of all arbitration documents, including exhibits and supporting union documentation of this case. Interestingly, the union provided evidence that AK's own written safety directives instruct drivers to "haul within the legal load limits and secure all loads on all vehicles," in conflict with the verbal orders to haul more than twice the legal limit.

For further information you can reach me at 724-482-4726, or contact the union attorney, Mr. Jack Murtaugh, at 724-935-7555.

Thank you for your attention to this urgent matter. AK's directives to its truck drivers are not only a violation of law, but they are also a serious threat to the lives and safety of the men and women employed there.

Sincerely,


Joe Myers

Enc. (with the mailed version)

CC: Julie Graham, Butler County Solicitor
Mike Fisher, PA Attorney General
David Devries, of PA Attorney General's Office
Mark Schweiker, PA Governor
John Ashcroft, U.S. Attorney General



Timothy F. McCune

District Attorney

Butler County

124 W. Diamond Street :-: P.O. Box 1208 :-: Butler, PA 16003-1208
(724) 284-5222 FAX (724) 284-5460 TDD (724) 284-5473

December 19, 2001

Joseph Myers
147 Heather Drive
Butler, PA 16001-2819

RE: AK Steel

Dear Mr. Myers:

I have reviewed the information you sent me including the two page letter with the Union's Brief enclosed and a copy of the letter you apparently sent to several AK Steel officials dated March 21, 2001.

I have no opinion regarding your employment claims with AK Steel. I am, however, of the opinion that the Pennsylvania Vehicle Code weight restrictions involved in this matter apply only to the operation of vehicles upon highways and would not apply to the operation of vehicles on AK Steel's private property.

Very truly yours,

Timothy F. McCune
District Attorney

TFM/sjl

cc: John W. Murtagh, Jr., Esq.
Murtagh & Cahill
110 Swinderman Road
Wexford, PA 15090

CERTIFICATE OF SERVICE

I, the undersigned, certify that the foregoing PETITIONER'S NOTICE OF APPEAL ADDENDUM 2-23-21 was served on the following via U.S. Mail, First-Class, this 8th day of March, 2021.

**Erie County Courthouse
Att: William Cunningham
140 West 6th Street
Erie, PA 16501**

**Administrative Office of Pennsylvania Courts
Att: Michael Dailey legal counsel for judges
John T. Bender, Alice Beck Dubow and
Carolyn H. Nichols
1515 Market Street, Suite 1414
Philadelphia, PA 19102**

**Frost Brown Todd LLC
Union Trust Building / Att: Nicholas J. Koch
501 Grant Street, Suite 800
Pittsburgh, PA 15219**

**Superior Court of Pennsylvania
Att: Joseph D. Seletyn
310 Grant Street, Suite 600
Pittsburgh, PA 15219-2297**

**JonesPassodelis PLLC
Gulf Tower /Att: Ms. Jones & Mr. Letterich
707 Grant Street, Suite 3410
Pittsburgh, PA 15219**

**Butler County et al
County Commissioners
5th Floor, County Govt. Center
124 W. Diamond Street
Butler, PA 16001**

**Angelo Papa
318 Highland Ave
New Castle, PA 16101**

**Richard A. Goldinger D.A.
3rd Floor, County Govt. Center
124 W. Diamond Street
Butler, PA 16001**

**Graydon Brewer
48 Crystal Drive
Oakmont, PA 15139-1051**

**Corporal Tim Morando
PA State Police
200 Barracks Road
Butler, PA 16001**

**Murtagh, Hobaugh & Cech
Att: Adam Hobaugh
110 Swinderman Road
Wexford, PA 15090**

**Marshall Dennehey Warner Coleman & Goggin
Union Trust Building / Att: Dennis Roman
501 Grant Street, Suite 700
Pittsburgh, PA 15219**


Joe Myers