

THOMAS CASEY, *Appellant*

Office of Open Records

v.

Docket AP 2016-0868

WEST GOSHEN TOWNSHIP, *Appellee*

June 23, 2016

Dear Mr. Schee,

I would like to respond the Township's reply from June 21, 2016, to my submission on June 20, 2016. I will do my best to keep this short. As I am sure you are a busy person.

The Township's interpretation paragraph is flawed for two simple reasons:

- 1) their interpretation of which township manager I was referring to is at odds with who was actually the Township manager during the 2001-2016-time period. Mr. LaLonde has been the manager from 2007 to 2016. Prior to that Ms. Sharon Lynn was the township manager from 2001 to 2007. My request stated "... *WG Sewer Plant since 2001.*"
- 2) The Township maintains that the Treatment Plant and all sewer facilities are maintained by Township employees under a lease agreement (*Exhibit I*) is in direct conflict with facts that are stated in *Exhibit G's* first page. It states that West Goshen Township, in October 2015, brought the operations back under the supervision of the Public Works Department. The Township also stated publicly in March 2016, that neither the Township manager nor the Director of Public Works was responsible for management of Treatment Plant employees. I am providing the Township's statement from a public meeting on March 9, 2016 (*Exhibit M*) that is accessible online at the Township's website.

According to the Township, the operations during the 15-year time period I was asking about were never under the duties of the Township manager nor the Director of Public Works. Both of these job descriptions can be found in the township records. This would conclude that the township employees were acting and working under their own supervision without the Township manager's oversight for the time period in question. Essentially making any communications from Treatment Plant employees and Treatment Plant management to Township management a third party communication. Both of which were provided to me in the Township's original reply to my request.

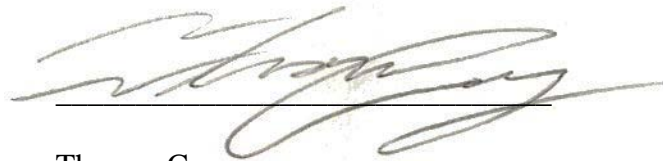
With regards to their opposition to my exhibits **G, H, and L**. The Township provided me with third party vendor information in my original request (**Exhibit B**). The communications from Gateway Petroleum Technology, Inc. (pg 2), To & From: Linda Poole Delaware Valley Insurance Trust (pg 6-9), Dave from Gatepet@aol.com (pg 13), To & From William Hardy (pg 14), To & From Alisa Pieczynski (pg 17-18) would all fall under third party vendors. According to their statement, "*such communications are not responsive to the Request...did not request communications from or to third party agencies...*". Although I did not specifically ask for this information, it was provided to me none the less.

My assertion is reasonable due to the lengthy list of both senders of the emails and receivers of the emails, along with the lengthy list of people cc'd on the emails from both the Township's submission (**Exhibit B**) and my submissions (**Exhibit L**) which also includes several emails to Tina Charron-Administrative Asst. WG Treatment Plant a township employee from both Mr. Casey LaLonde-Township Manager and Mr. David Woodward-Asst. Director Public Works/Now Director of Public Works, that other communications would have occurred and in

fact did occur. It also goes to establish my point that I was not provided all the communications I asked for originally.

The Township, from the very beginning of my original request, has established a precedence that third party communications (**39% of Exhibit B**) were also to be included as part of my request. It should not now be allowed to become their argument as to why they would not provide all the relevant communications from my request.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Thomas Casey', written over a horizontal line.

Thomas Casey

Cc: Alexandra M. Trunzo, Esq.