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APR - 7 2015  
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### Right to Know Request Document Production – Joshua Prince

- A. Legal Defense Fund Account Screen Print (Produced)
- B. Online Contributions to 3/27/15 (Produced w/ Redactions)
- C. Cash and Check Contributions to 3/27/15 (Produced w/ Redactions)
- D. City of Lancaster Cash Account Fulton Bank (Produced)
- E. January 2015 Solicitor's Invoice (Produced)
- F. February 2015 Solicitor's Invoice (Produced)
- G. Insurance Claim Documentation (Produced)
- H. City emails regarding NRA lawsuit (Produced)
- I. Emails with Travelers regarding coverage of defense of lawsuit (Produced)
- J. Emails regarding Media Communication NRA lawsuit, establishment of legal defense fund, and process to set up communications website, use of funds (Produced w/ Redactions)
- K. Emails regarding Prince Right to Know Request (Produced w/ Redactions)
- L. Emails from Mayor (Withheld and Produced w/ Redactions)

	<b>Document</b>	<b>Date</b>	<b># of Pages</b>	<b>Description of Redaction</b>	<b>Privilege Type</b>
B.	Common Sense Lancaster Defense Fund Online Contributions	3/25/15	3	Name, address and email of contributors	Exempt Under Act
C.	Common Sense Lancaster Cash/Check Contributions	3/25/15	2	Name, address and email of contributors	Exempt Under Act
J.	Email string	1/19/15	2	Name	Exempt Under Act
J.	Email	1/15/15	1	Telephone number	Exempt Under Act
J.	Email String	1/15/15		Contains Account Usernames and/or Passwords	Privacy
J.	Email	1/15/15	1	Telephone number	Exempt Under Act
K.	Email	2/26/15	1	Communications Between Mayor's Office and City Solicitor	Attorney Client
K.	Email	2/26/15	2	Communications Between Mayor's Office and City Solicitor	Attorney Client
K.	Email	2/26/15	3	Communications Between Mayor's Office and City Solicitor	Attorney Client
K.	Email	3/25/15	1	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email	3/27/15	1	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email	3/30/15	2	Communications Between Mayor's Office and City Solicitor	Attorney Client; Exempt Under Act
L.	Email String	3/24/15-3/30/15	5	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email	3/30/15	2	Communications Between Mayor and City Solicitor	Attorney Client
L.	Email String	3/24/15-3/27/15	1	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email String	3/24/15-3/26/15	3	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email Attachment	3/24/15	7	Ordinance	Pre-decisional
L.	Email and Attachment	3/20/15	5	Communication between Mayor's Office, Solicitor's office and Assistant Counsel	Work Product and Attorney Client
L.	Email string	2/26/15	2	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email	2/25/15	1	Communications Between Mayor and City Solicitor	Attorney Client

## Hopkins, Patrick

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**From:** Brogan, Pat  
**Sent:** Thursday, February 26, 2015 1:07 PM  
**To:** Hopkins, Patrick; Barry Handwerger; Gray  
**Subject:** RE: Right-to-Know request: NRA lawsuit and Legal Defense Fund docs

**Importance:** High

I'd also like to advise the press that we have received this request. I'm right now tracking down info from Shira Goodman about other entities that have received this RTK request. Stay tuned and I'll do the same.

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**From:** Hopkins, Patrick  
**Sent:** Thursday, February 26, 2015 1:03 PM  
**To:** Barry Handwerger; Gray  
**Cc:** Brogan, Pat  
**Subject:**

Patrick S. Hopkins  
Business Administrator  
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the city of **Lancaster**  
*a city authentic*

## Hopkins, Patrick

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**From:** Brogan, Pat  
**Sent:** Thursday, February 26, 2015 1:17 PM  
**To:** Shira Goodman  
**Cc:** Gray; Barry N Handwerger; Hopkins, Patrick  
**Subject:** RE: RTK requests on Donors

Thanks for clarifying, Shira. I will advise Mayor Gray and our Solicitor of this action. I can also tell you that the City received a right to know request earlier today from Mr. Prince.

**From:** Shira Goodman [mailto:shira.goodman@ceasefirepa.org]  
**Sent:** Thursday, February 26, 2015 1:13 PM  
**To:** Brogan, Pat  
**Subject:** Re: RTK requests on Donors

This is the blog post from attorney Joshua Prince -- it looks like they first want DAs to prosecute city officials for asking for donations -- ie soliciting conspiracy to violate preemption. We believe it implies that donating is illegal as well and we wanted people to know this is outrageous.

BY JOSHUA PRINCE, ESQ. | FEBRUARY 19, 2015 · 12:00 PM

## Is the City of Harrisburg Attempting to Solicit People to Conspire to Violate the Law?

Recently, the City of Harrisburg announced that it was accepting donations to support its fight against several lawsuits, including ours, in relation to its illegal and unlawful firearm ordinances. However, it appears that the City's solicitor didn't think through this request in relation to Pennsylvania's Crimes Code.

Let's start with the underlying statute that prohibits any municipality from regulating firearms and ammunition. 18 Pa.C.S. 6120 provides:

No county, municipality or township may in any manner regulate the lawful ownership, possession, transfer or transportation of firearms, ammunition or ammunition components when carried or transported for purposes not prohibited by the laws of this Commonwealth.

18 Pa.C.S. 6119 then goes on to declare:

Except as otherwise specifically provided, an offense under this subchapter constitutes a misdemeanor of the first degree.

Therefore, it is a misdemeanor of the 1st degree for any county, municipality or township to violate Section 6120.

Pennsylvania's Crimes Code also includes crimes for attempt, solicitation and conspiracy.

Specifically, 18 Pa.C.S. 901 addresses criminal attempt and declares:

A person commits an attempt when, with intent to commit a specific crime, he does any act which constitutes a substantial step toward the commission of that crime.

18 Pa.C.S. 902 addresses criminal solicitation:

A person is guilty of solicitation to commit a crime if with the intent of promoting or facilitating its commission he commands, encourages or requests another person to engage in specific conduct which would constitute such crime or an attempt to commit such crime or which would establish his complicity in its commission or attempted commission.

Lastly, 18 Pa.C.S. 903 addresses criminal conspiracy:

A person is guilty of conspiracy with another person or persons to commit a crime if with the intent of promoting or facilitating its commission he:

- (1) agrees with such other person or persons that they or one or more of them will engage in conduct which constitutes such crime or an attempt or solicitation to commit such crime; or
- (2) agrees to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime.

As the City is now soliciting individuals to fund and support its litigation involving its unlawful firearm and ammunition ordinances, so that it can continue to enforce these illegal and unlawful ordinances, it seems clear that the City and Mayor Papenfuse are involved in attempting to solicit people to conspire to violate Section 6120 and anyone donating in support would likewise be attempting and conspiring to violate Section 6120. As the Commonwealth Court has already ruled in Dillon v. City of Erie that an identical parks ordinance was illegal and in Clarke v. House of Representatives ruled that lost and stolen ordinances are illegal, there can be no dispute that the City of Harrisburg and its elected officials have violated Section 6120. Therefore, we call upon District Attorney Marsico to bring charges against all of those involved, including the City of Harrisburg and its elected officials for violating Section 6120. It is time that our district attorneys hold our publicly elected officials accountable for their criminal acts.

<http://blog.princelaw.com/category/firearms-law/pennsylvania-firearms-law/>

On Thu, Feb 26, 2015 at 1:10 PM, Brogan, Pat <[PBrogan@cityoflancasterpa.com](mailto:PBrogan@cityoflancasterpa.com)> wrote:

Hi, Shira.

Mayor Gray was contacted by a reporter this morning about an alert that was allegedly sent out by Cease Fire PA. We're told that the alert advises that the NRA is threatening civil action against donors to funds established to defend municipalities against NRA suits. Can you confirm this is correct? If so, can you send me any alerts or advisories that Cease Fire PA may be releasing about this matter?

Thanks very much.

■ Pat

Patricia A. Brogan

Chief of Staff

Office of the Mayor

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Shira Goodman, Esquire  
Executive Director

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## Hopkins, Patrick

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**From:** Brogan, Pat  
**Sent:** Thursday, February 26, 2015 1:19 PM  
**To:** Hopkins, Patrick  
**Subject:** FW: RTK requests on Donors

**From:** Shira Goodman [mailto:shira.goodman@ceasefirepa.org]  
**Sent:** Thursday, February 26, 2015 1:14 PM  
**To:** Brogan, Pat  
**Subject:** Re: RTK requests on Donors

We sent the following email to our supporters:

We've known from the start that Act 192 was a bullying tactic from the greedy gun lobby focused on suing our towns and  
But now they're taking it to a new level.  
Some of the cities that are being sued have set up legal defense funds to ask for help from citizens to fight back -- pretty st  
contribute to legal defense funds. That's right -- those gun bullies are claiming that contributing to a city's legal defense fu  
It's plain to see what's happening. When you empower bullies, they turn into monsters -- and become enraged when anyor  
bully, threaten and sue anyone who tries to stand up for PA cities. Well, we won't back down and we won't be bullied.

But our legislators in Harrisburg need to know the impact of their last minute, late night gift to the gun lobby. Will you tak  
unleashed?

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## Hopkins, Patrick

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**From:** Brogan, Pat  
**Sent:** Thursday, February 26, 2015 2:17 PM  
**To:** Shira Goodman; Barry N Handwerger; Strazzo, Amber  
**Cc:** Baker, Jennifer; Hopkins, Patrick; Patterson, Randy; Katzenmoyer, Charlotte; Sadler, Keith; Gregg, Timothy; Burkholder, Bernie  
**Subject:** Right to Know Request  
**Attachments:** NRA RTK Request 02262015.pdf; Cease Fire PA email 02262015.pdf; NRA J Prince Blog on Defund Fund Donors 02262015.pdf

**Importance:** High

Shira and Barry,  
Per authorization from Mayor Gray, the attached RTK request has been released to local media.

Amber,  
OK to post and release on all our social and websites AFTER 5 PM today.

Everyone,  
Other two attachments provide background. Use as you see fit. As inquiries come in, our response is:  
*This is yet another example of extremism, bullying, and intimidation on the part of the gun lobby. We are processing this right-to-know request just as we would any other such request that involves litigation. That is to say, we have forwarded this request to the City Solicitor for review.*

Please refer any questions to me. Thanks to me.

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**Hopkins, Patrick**

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**From:** Strazzo, Amber  
**Sent:** Thursday, February 26, 2015 3:58 PM  
**To:** Hopkins, Patrick  
**Cc:** Brogan, Pat  
**Subject:** RE: NRA RTK stuff for social media

I'm wondering how I should be posting this. Just posting the links with no real context doesn't make any sense. Should I post a blog explaining what's happening and include those links? Or just post them on Facebook?

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**From:** Hopkins, Patrick  
**Sent:** Thursday, February 26, 2015 3:52 PM  
**To:** Strazzo, Amber  
**Cc:** Brogan, Pat  
**Subject:** NRA RTK stuff for social media

Amber – Pat asked me to connect with you about what to include on our social media outlets about the Right-to-Know Law request for donor names, etc.

Here are links to the CeaseFirePA post about the bullying tactics of the gun lobby:

<http://www.ceasefirepa.org/updates/>

Here's the blog by the individual who submitted the Right-to-Know request for the names of donors to the Common Sense Lancaster Legal Defense Fund:

<http://blog.princelaw.com/2015/02/19/is-the-city-of-harrisburg-attempting-to-solicit-people-to-conspire-to-violate-the-law/>

I think links to these two pages along with a photo of the Right-to-Know request would get the message across loud and clear what the gun lobby folks are up to. If you post the RTK request form, please use the attached version where I've whited out Karen Kast's name at the bottom of the form.

Let me know if you have any questions about this.

Patrick

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the city of **Lancaster**  
*a city authentic*

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## Hopkins, Patrick

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**Cc:** Brogan, Pat  
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**Attachments:** 022615 Prince, Joshua RTK Request.pdf

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