

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

PIONEER LAKE OUTDOOR CLUB, INC., ♦

Plaintiff, ♦

vs. ♦

COLLEEN KUCZINSKI, ♦

Defendant. ♦

No. 2008-747-CD

Type of Pleading: ACTION FOR
DECLARATORY JUDGMENT

Filed on Behalf of: PLAINTIFF

Counsel of Record for this Party:

J. Kipp Lukehart, Esquire

PA I.D. # 05865

LUKEHART & LUNDY

219 East Union Street

P.O. Box 74

Punxsutawney, PA 15767

(814) 938-8110

FILED

m/10:53 am
APR 24 2008

William A. Shaw

Prothonotary/Clerk of Courts

pd \$95.00 Att
3cc Att

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

PIONEER LAKE OUTDOOR CLUB, INC., ♦

Plaintiff, ♦

vs. ♦

No. _____ ♦

COLLEEN KUCZINSKI, ♦

Defendant. ♦

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claim in the complaint or for any other claim or relief requested by the Plaintiff.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN OBTAIN LEGAL HELP.

Clearfield County Prothonotary
Clearfield County Courthouse
P.O. Box 549
230 East Market Street
Clearfield, PA 16830
(814) 765-2641

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
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PIONEER LAKE OUTDOOR CLUB, INC., ♦

Plaintiff, ♦

vs. ♦

No. _____ ♦

COLLEEN KUCZINSKI, ♦

Defendant. ♦

ACTION FOR DECLARATORY JUDGMENT

AND NOW, comes the Plaintiff, PIONEER LAKE OUTDOOR CLUB, INC., by and through their Attorney, J. Kipp Lukehart, and brings forth the following Action for Declaratory Judgment:

1. The Plaintiff is PIONEER LAKE OUTDOOR CLUB, INC., which is a duly organized non-profit corporation organized under the laws of the Commonwealth of Pennsylvania, with a principal place of business at 623 Pioneer Lake Drive, Cherry Tree, Pennsylvania.
2. The Defendant is COLLEEN KUCZINSKI, an adult individual who has a last known address of 78 A Mullooly Street, Pittsburgh, Pennsylvania.
3. The Plaintiff has certain By-Laws that were last revised in July of 2001, attached, as Exhibit A.
4. During the summer of 1999, the Defendant was admitted for membership into the PIONEER LAKE OUTDOOR CLUB, INC. by paying Five Thousand Dollars (\$5,000.00) to another member, upon which the Membership and Lot/Site # 17 were transferred to Defendant.

5. There is a mobile home on the site and other personal property.
6. Defendant has failed to pay special late payment assessments since January 2004.
7. Article X of the By-Laws, Removal of Member, states that a member may have their membership in the Club revoked if, among other things, there is a failure to pay dues or special assessments within an eighteen (18) month period.
8. At the May 2005 meeting, the Defendant agreed to pay the special delinquency assessments of Three Hundred Fifty-Eight Dollars and Seventy-Five Cents (\$358.75). See Exhibit B.
9. Defendant attempted to pay the special late payment assessments via personal check, which was returned N.S.F. See Minutes of October 16, 2005, Exhibit C.
10. On November 11, 2005, the Board of Directors, via a unanimous vote, revoked Defendant's membership for failure to pay special late payment assessment for a period exceeding eighteen (18) months in accordance with Article X, Subparagraph 1 of the By-Laws. Minutes attached as Exhibit D.
11. On November 17, 2005, the Board of Directors forwarded a letter on to the Defendant informing her that her membership would be voted upon for a removal by the entire membership. See Exhibit E.
12. On December 12, 2005, the Board of Directors informed the Defendant that a poll would be conducted in order to count the votes for her removal of membership. See Exhibit F.
13. On January 21, 2006, the Board of Directors held a special meeting to count the votes for the removal of Defendant's membership. As required by the By-Laws,

Article X, a majority of the membership voted for the removal of Defendant's membership. Minutes attached as Exhibit G.

14. The Board of Directors, on January 26, 2006, forwarded a letter on to the Defendant informing her that her membership was revoked, she had to remove all of her personal property within thirty (30) days, and she would have one (1) year to liquidate her holdings. See Exhibit H.

15. To date, Defendant has failed to acknowledge that her membership has been revoked by the following actions:

- A. Non-removal of her travel trailer;
- B. Non-removal of personal property. See letters of March 13, 2006, Exhibit I; July 7, 2006, Exhibit J; and August 24, 2007, Exhibit K;
- C. Continued use of site. See Minutes of June 16, 2006, Exhibit L;
- D. Refusal to liquidate her holdings in the Club, pursuant to Article X of the By-Laws. See letter of January 7, 2007, Exhibit M; and
- E. By permitting others the use of her site. See Minutes of June 16, 2006, Exhibit L.

16. The relief sought by this Declaratory Judgment is that Defendant's membership was revoked by the Club in accordance with the By-Laws based upon her nonpayment of special late payment assessments.

17. A Declaratory Judgment determining that her membership rights have been revoked is necessary so that the Club may proceed with its other obligations in the By-Laws and as a landowner.

18. The obligation included in the By-Laws is the repayment of the member of the original purchase price of their share, in this case Five Thousand Dollars (\$5,000.00).

19. The obligation of a landowner is the proper removal of Defendant's trailer and other personal property items from her now revoked site.

20. A Declaratory Judgment rendered in the Club's favor will also aid in preventing Defendant from continually authorizing "guests" to accessing her site.


21. The Declaratory Judgment is permitted when the relief sought will terminate a controversy to remove uncertainty regarding legal rights.

22. The relief sought here is a determination that Defendant's membership has been revoked.

23. This will terminate the controversy and remove any uncertainty regarding legal rights as Defendant has been informed that her membership has been revoked and she refuses to acknowledge same.

24. This controversy is ripe for judicial determination as the Board of Directors of the PIONEER LAKE OUTDOOR CLUB, INC., have already revoked MS. KUCZINSKI's membership by properly following the By-Laws and yet same is not acknowledged or adhered to by Ms. Kuczinski.

WHEREFORE, the Plaintiff, PIONEER LAKE OUTDOOR CLUB, INC., is requesting Declaratory Judgment in their favor against the Defendant, COLLEEN KUCZINSKI, that Colleen Kuczinski's membership in the PIONEER LAKE OUTDOOR CLUB, INC. has been revoked.



J. Kipp Lukehart
Attorney for Plaintiff

VERIFICATION

I, KEITH SMITH, Secretary of PIONEER LAKE OUTDOOR CLUB, INC.,
verify that the statements made in this Action for Declaratory Judgment are true and
correct. I understand that false statements herein are made subject to the penalties of 18
Pa.C.S. Section 4904 relating to unsworn falsification to authorities.



Keith Smith, Secretary

PIONEER LAKE OUTDOOR CLUB BY-LAWS
(Revised July, 2001)

ARTICLE I - Name

Pioneer Lake Outdoor Club

ARTICLE II - Purpose

To provide for a family oriented camp and recreation area and to do all things necessary in connection therewith including but not limited to the acquisition of property, the hypothecation and/or sale of same and the development thereof and the maintenance of a limited membership for that purpose. The corporation shall have unlimited power to engage in and do any lawful act concerning any or all lawful business for which non-profit corporations may be incorporated under the Non-profit Corporation law of 1972.

ARTICLE III - Membership

All individuals who are owners of shares in the club shall be members of the organization provided, however, that one voting membership only shall be attached to each family membership and may be voted by the husband or the wife, but not both. Also, a share owner may, in their absence, have another person vote for them by proxy, provided that person has written permission from the share owner.

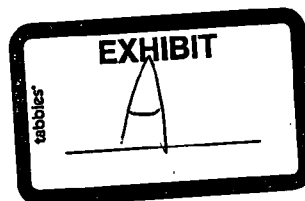
ARTICLE IV - Governance

The voting members shall elect a Board of Directors of five (5) members. The Board will elect annually from its membership a President, Vice-President, Secretary and Treasurer, to perform such duties and have such responsibilities as is customary. Three members shall constitute a quorum.

ARTICLE V - Meetings

The annual meeting of the membership shall be on the first Saturday of July and the quorum for the annual membership meeting shall be 50% of the membership.

The Board shall meet during the summer months, once a month, on the first Saturday of the month and during the other nine months of the year shall meet quarter-annually on the first Saturday of November, February and May. Special meetings of the Board may be called by the President or any two Board members and all members of the Board must be notified of any special meeting.



ARTICLE VI - Elections

Elections shall be conducted at the annual meeting of the membership. Two members of the Board shall be elected in 1977, two members in 1978, one member in 1979 and thereafter, on the same rotational basis and a member may serve unlimited number of terms on the Board. Term of office of Board members shall begin on September 1st and shall last for three years.

ARTICLE VII - Committees

The Board shall appoint a Rules Committee and a Grounds Committee which shall contain one member of the Board and two Non-Board members, and may appoint such other committees as may be necessary.

ARTICLE VIII - Fiscal Year

The fiscal year shall extend from September 1st through August 31st.

ARTICLE IX - Amendments

By-laws shall be amended only by members at annual meeting, or by referendum vote by a majority of the membership.

ARTICLE X - Removal of a Member

The board, by a two-thirds vote of the full board, may remove a member for just cause. Such member shall have the right to appear at the board meeting and plead his/her case. Should the vote be to remove the member, the removal shall be subject to a majority vote of the entire membership. Such vote shall be final and binding as to the membership and the removed member shall have 1 year in which to liquidate his holdings. If not sold in one year, the Corporation will pay member the original purchase price of the share.

Examples of reason for removal shall be as follows, but not limited to:

1. Non-payment of dues or any special assessments within an 18-month period.
2. Failure of a member to perform necessary maintenance of their share (after due warning).
3. Intentional destruction of property, be it personal or Corporation.

ARTICLE X - Removal of a Member (cont.)

4. Careless or dangerous practices on the water or property of the Corporation after one verbal and one written warning.
5. A member who becomes involved in a physical confrontation with or abuse of another member or guest on Corporation property.

ARTICLE XI - Property Restrictions

Membership in the organization may be inherited by one (1) child of the member or one (1) person of the member's choice, but may not be fractioned among several children or people; and membership may be sold to a prospective member, proved however, the purchaser must be approved by the Orientation Committee. Membership shall be limited to forty members, unless at a regular meeting of the entire membership it is voted upon to increase the number of members.

ARTICLE XII - Dissolution

Upon dissolution of the Corporation, the property shall be sold and the proceeds divided evenly among the members.

**PIONEER LAKE OUTDOOR CLUB
MEMBERSHIP MEETING 5-28-05**

The meeting was opened with prayer by Bette Null.

There were 15 shares represented—a list is attached to the official copy hereof

The minutes of the September 2004 meeting were approved as read.

The treasurers report was presented in printed form as a 12 month summary

Annual revenue	\$17,554.98
expense	<u>17,659.81</u>
balance	\$11,727.30

Bette Null and Keith Smith were re-elected for three year terms and Chris Adams was appointed to fulfill George Nagy's term.

OLD BUSINESS

Rebuilding the spillway bridge awaits d e p approval of our plan

Work continues on the emergency action plan—the first submission was rejected

The 2005 weed treatment plan has been scheduled

Rule updates were presented in written form and approved—mailed to others

Repairs needed on the garage were noted

The new pump house was completed at a cost of \$3700

NEW BUSINESS

The issue of delinquency fees relating to the Kuczinski's was discussed at length by the membership(evidence of 3 notifications of such fees had been made) resulting in requiring payment to restore priviledges—Colleen agreed to pay.

An appeal was made for more volunteers to work on projects at the lake

A plan to develop a membership handbook was announced.

It was noted that the pavilion needed repaired—decided to replace deteriorated wall sections and to install siding

the annual brunch was set for July 9th. and the picnic for August 13th.

Al Hallman was honored with a plaque recognizing years of dedicated service and leadership

respectfully submitted
Keith Smith—sec.



PIONEER LAKE OUTDOOR CLUB BOARD OF DIRECTORS MEETING

10-16-05

Meeting called to order by President Gardner at 1:35 pm

Directors present---Gardner – Null – Henry and Smith

Minutes of the 9-04-05 board meeting were read and approved

Treasurer Null's report was as follows;

Bank balance	\$9155.83
Petty cash	<u>257.24</u>
Available	\$9413.07

Expected bills for the balance of the year will be for electric and insurance.

Discussion was held on the status of our bridge replacement—and whether or not we should make another payment to Murray Henry

The bridge replacement will not be approved in time to do anything this year, but considering the fact that weed treatment will be about \$9000 next year AND the possibility of legal challenge by Colleen Kuczinski it was decided to wait for now.

The major topic of discussion centered on the situation regarding Kuczinski's.

Keith Smith reviewed the contents of a letter written, at the direction of the membership during the 9-24-05 membership meeting advising Colleen that ;

- 1-her check paying \$179 of her late payment fees was returned for nsf generating an \$8 charge from our bank.
- 2-the membership had voted to assess a 5% late payment charge on late fee balances remaining unpaid.
- 3-the membership also voted to advise Colleen, by certified mail –return receipt requested, that storage of disabled auto's at the lake was unacceptable and that if not promptly removed it would be towed at their expense.

Keith also related the details of a phone call with Colleen after she received that letter—she wanted to see if all of our rules were filled with the state---she wants to challenge the board and the memberships authority to rule

Bette Null reported that the nsf checked cleared on representation but that \$179 was still owed—only paid half so far

President Garner then related his phone conversation in which Colleen;

- 1-advised that if the auto was towed she would charge us with grand theft auto which I assume means the board.
- 2-advised that if she received further threatening letters from Keith Smith she would sue him.
- 3-advised that neither she nor Donna Padobnic had received notice of the meeting
- 4-asked who else had paid late fees



It was noted Colleen had previously made claims of not being notified but at the May 05 Meeting she was presented evidence of notification she denied receiving.

The board decided to seek legal advice from an Indiana County attorney on the disabled car issue and on article ~~8~~¹⁰ of the by laws which provides for removal of a member.

Don Henry may have a connection to a lawyer and will call Keith if that works out. Keith is to work with whatever attorney we decide on using

There being no other business, President Gardner adjourned the meeting at 2:40 pm

Respectfully submitted Keith Smith Sec.

**PIONEER LAKE OUTDOOR CLUB
SPECIAL BOARD OF DIRECTORS MEETING
NOVEMBER 11, 2005**

The meeting was called to order by President Gardner at 7:05 P M

Members present were Gardner, Adams, Null, Henry, and Smith

The purpose of the special meeting was to review the option and remedies available to the board to address problems relating to the Kuczinski membership.

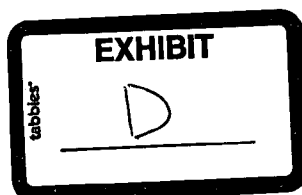
- 1-abandoned –disabled vehicle towed to their designated site for storage'**
- 2-late payment assessments dating from January 2004.**
- 3-multiple issuance of N S F checks to the lake**
- 4-condition of their designated site**

A motion by Adams-seconded by Henry-to have the “stored “ vehicle towed at Kuczinski’s expense was approved unanimously.

A second motion by Adams-seconded by Null-to revoke the Kuczinski membership in accordance with article X of the bylaws was approved unanimously.

President Gardner to notify Colleen Kuczinski of the removal and that she may appear at the December 4, 2005 board meeting to appeal the decision of the board---that meeting to be held at 4:30 PM in the lake garage.

**Respectfully submitted
Keith Smith Sec.**



November 17, 2005

Mrs. Coleen Kuczinski
75 R Mullooly Street
Pittsburgh, PA 15227

Dear Colleen:

The Pioneer Lake Outdoor Club Board of Directors, in accordance with Article X of the by-laws, voted unanimously to remove you from the membership for just cause.

The just cause is non-payment of assessments in a timely manner as spelled out in the by-laws; and additionally for submitting multiple checks for which there was insufficient funds in your bank account.

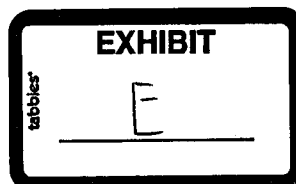
The Board also voted unanimously to have the disabled vehicle stored at the site assigned to you removed from lake property.

Article X provides you the opportunity to appear before the Board to appeal the membership removal decision. The Board will meet on Sunday, December 4, 2005 at 4:30 p.m. to provide you the opportunity to make that appeal. You may appeal the auto removal decision at that time also.

The meeting will be held at the lake's garage located adjacent to your site.

Sincerely,

Pioneer Lake Outdoor Club
Board of Directors
Norman Gardner, President



December 12, 2005

Ms. Colleen Kuczinski
78R Mullooly Street
Pittsburgh, PA 15227

Dear Ms. Kuczinski:

At a meeting of the Board of Directors on December 11, 2005, the Board voted to poll the membership and ask for a vote on your removal as a member of Pioneer Lake Outdoor Club, Inc.

In order to contact the entire membership, the poll shall be conducted by mail, with a deadline for votes to be counted. Votes received after the deadline will not be considered. Our mailing to the members will commence in a few days.

Enclosed you will find a complete list of the 38 members so you may also contact each member if you wish. The reason for 38 members is that two (2) members own two (2) shares, but only have one (1) vote.

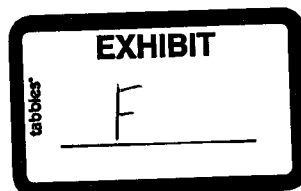
Total = 40 shares - 38 votes

We will contact you as soon as possible after the votes have been tabulated, and give you the results. At that time, we will also notify you as to what course of action, if any, will be taken.

Sincerely,

Norman Gardner, President
Pioneer Lake Outdoor Club, Inc.
Board of Directors

Enclosure



**PIONEER LAKE OUTDOOR CLUB
SPECIAL BOARD OF DIRECTORS MEETING
JANUARY 21, 2006**

President Gardner called the meeting to order at 5:00 for the single purpose of counting the membership ballots in regard to the removal of Colleen Kuzcinski from membership.

Board members present

Gardner, Null, Henry, and Smith

Also present were

John Lipka---member of lake not a board member---to witness the
ballot count

Donald Reger---a non member of the lake---to witness the ballot count

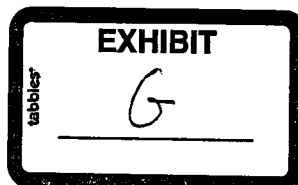
The process was; Don Henry and Norm Gardner opened the ballot envelopes and counted the ballots. The witnesses observed the count and they recounted the ballots themselves

There were 34 ballots completed and returned by the designated deadline.

The ballot count was 30 yes to remove and 4 to retain membership

Respectfully submitted

Keith Smith Sec.



January 26, 2006

Mrs. Coleen Kuczinski
75 R Mullooly Street
Pittsburgh, PA 15227

Dear Ms. Kuczinski:


This letter is to inform you that the Board of Directors has held a meeting; and the votes concerning your removal from membership were opened and tabulated. The vote count was witnessed by one non-board member of the corporation, and one non-member of the corporation.

A vast majority of the membership has voted for your removal under Article 10 of the by-laws.

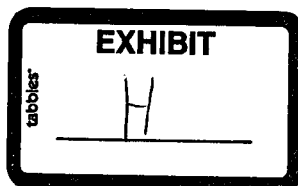
This letter is your notice that within thirty (30) days of the above date, you must remove all personal property from the corporation.

As per Article 10 of the by-laws, you will then have one (1) year from the above date to liquidate your holdings at Pioneer Lake Outdoor Club.

Sincerely,



Pioneer Lake Outdoor Club
Board of Directors
Norman Gardner, President



March 13, 2006

Mrs. Coleen Kuczinski
75 R Mullooly Street
Pittsburgh, PA 15227

Dear Colleen:

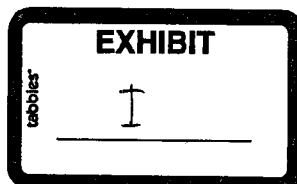
In a letter dated January 26, 2006, you were asked to remove personal property from your share at Pioneer lake.

A disabled vehicle remains at your site after the 30-day time frame and must be removed.

Please have this vehicle towed or driven off the property within 15 days of the above date, or the vehicle will be taken by a salvage yard at your expense.

Sincerely,

Norman Gardner, President
Pioneer Lake Outdoor Club
Board of Directors



July 7, 2006

Mrs. Coleen Kuczinski
75 R Mullooly Street
Pittsburgh, PA 15227

Dear Ms. Kuczinski:

In letters from the Corporation dated January 26, 2006 and March 13, 2006, you were asked to remove all personal property from the corporation grounds.

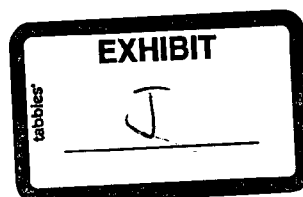
At this time, several items still remain (boat, four wheeler, motorcycle and possibly other items). Please remove all personal property within 20 days of the above date or the corporation shall have them removed.

Also, we wish to inform you that your share can not be transferred to another person without corporation approval.

Sincerely,



Pioneer Lake Outdoor Club
Board of Directors
Norman Gardner, President



August 24, 2007

Mrs. Coleen Kuczinski
75 R Mullooly Street
Pittsburgh, PA 15227

Dear Ms. Kuczinski:

FINAL NOTICE

To our knowledge, you have present on Pioneer Lake property:

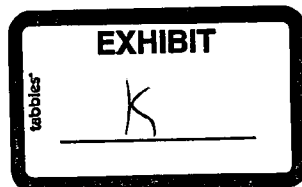
1. Mobile home
2. Golf cart
3. Trail bike
3. Lawn tractor
4. ATV
5. Boat and trailer

You have thirty (30) days from this date of notice to remove all personal property from Pioneer Lake Outdoor Club or it will be disposed of.

Sincerely,



Pioneer Lake Outdoor Club
Board of Directors
Norman Gardner, President



**PIONEER LAKE OUTDOOR CLUB
BOARD OF DIRECTORS MEETING
JUNE 16 2006**

Meeting called to order by President Gardner at 4:10 pm

Members present were Gardner, Null, and Smith

Minutes of March 4th. and May 5th. board meetings were read and approved.

Treasurers report showed a balance of \$1561.08 (checking and petty cash) so it isn't necessary to utilize our line of credit yet (it should be noted that several members have paid their assessments early)

Keith Smith reported that Indiana County Emergency Action Agency had reviewed our emergency plan—had requested a logical change—and the forms are back in their hands for approval (approval of draft to be submitted to d e p)

John Morris advised he will complete a bridge plan to d e p in June

Keith also discussed contact made about using Milfoil Weevils to combat the Eurasian Milfoil weeds. In quick summary the weevils are a native of Canada which has it.s own Northern Milfoil weed----Used typically on very large lakes heavily infested--- Are initially quite expensive---are slow in having and effect---are meant only to control---the weevil population grows following the growth of the milfoil.

Discussion was held on Colleen—her family being on site for purposes other than Site maintenance---being less than honest with Chris Adams—using the space behind their trailer as a bathroom---the condition of the site.

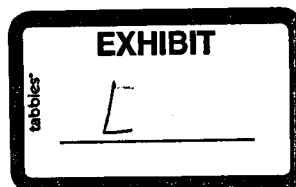
We are "TOLD" Colleen and Richard are divorced---That Colleen got the house and Richard got the camp!!!

On advice of counsel, Smoke will send a letter to Colleen advising her that any activity at the lake, by her family, other than to take care of her personal property Or to show it for sale will be considered trespassing and will be delt with accordingly—to be mailed by registered and regular mail—and a copy "attached to her trailer.

We have no confirmation of a divorce, the provisions of the divorce, or any location for contacting Richard.

There being no further business to discuss the meeting was adjourned

Respectfully submitted
Keith Smith



January 7, 2007

Ms. Colleen Kuczinski
75R Mullooly Street
Pittsburgh, PA 15227

Dear Colleen:

The time provided under the by-laws of Pioneer Lake Outdoor Club for you to sell or transfer your membership will expire on January 26, 2007.

The by-laws stipulate that a member removed has one year to sell or transfer that membership. After that time, Pioneer Lake Outdoor Club takes ownership and is obligated to pay a removed member the original purchase price of the membership.

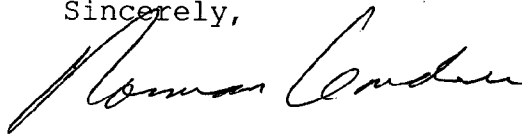
As of this date, you are the "person of record", although we were verbally advised that you gave up entitlement in a divorce settlement. We have been unable to confirm that action. If this is the case, please send a copy of divorce agreement.

The purpose of this letter is to advise you that we will withhold payment until it is clarified as to who will receive it.

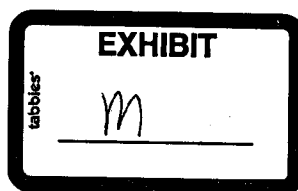
In addition, your trailer and all other personal property on the site remains yours. All should be removed from the premises by February 28, 2007. After that date, all personal property will be removed from the site at your cost, or removed by a salvage company.

During this time, if an approved prospective buyer for your membership is located by you, the Corporation will transfer ownership.

Sincerely,



Norman Gardner, President
Pioneer Lake Outdoor Club, Inc.



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

PIONEER LAKE OUTDOOR CLUB

Plaintiff

vs.

COLLEEN KUCZINSKI

Defendant

* NO. 2008-747-CD

*

*

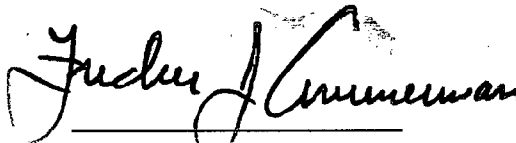
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*

ORDER

NOW, this 25th day of June, 2013, upon the Court's review of the docket and noting no activity for a period of over five years, it is the ORDER of this Court that the case be moved to inactive status. The Prothonotary shall code the case in Full Court as Z-INACTA.

BY THE COURT,



FREDRIC J. AMMERMAN
President Judge

RECEIVED NO CC

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JUN 28 2013 66

William A. Shaw
Prothonotary/Clerk of Courts