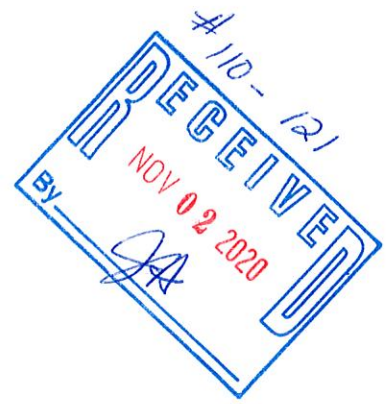




pennsylvania

OFFICE OF OPEN RECORDS



STANDARD RIGHT-TO-KNOW REQUEST FORM

DATE REQUESTED: 10/30/2020



REQUEST SUBMITTED BY: ☒ E-MAIL ☐ U.S. MAIL ☐ FAX ☐ IN-PERSON

NAME OF REQUESTER : West Easton Borough Constable

STREET ADDRESS : _____

CITY/STATE/COUNTY/ZIP(Required): West Easton, PA

TELEPHONE (Optional): _____

RECORDS REQUESTED: **Provide as much specific detail as possible so the agency can identify the information. Please use additional sheets if necessary*

1. I am seeking the following records as per attached sheet, with specific attention to records requested for inspection only. It is noted per today's conversation with Joan Heebner (RTK Officer) at 2pm, than no inspection is possible without a Police Officer present. State Police have refused to be present, and Borough Police are not available as of this date. In addition, Joan Heebner has hung up on me mid-sentence as usual.

DO YOU WANT COPIES? YES or NO

DO YOU WANT TO INSPECT THE RECORDS? YES or NO

DO YOU WANT CERTIFIED COPIES OF RECORDS? YES or NO

**** PLEASE NOTE: RETAIN A COPY OF THIS REQUEST FOR YOUR FILES ****
**** IT IS A REQUIRED DOCUMENT IF YOU WOULD NEED TO FILE AN APPEAL ****

FOR AGENCY USE ONLY

RIGHT TO KNOW OFFICER: Joan Heebner

DATE RECEIVED BY THE AGENCY: 11-2-2020

AGENCY FIVE (5) BUSINESS DAY RESPONSE DUE: 11-9-2020

***Public bodies may fill anonymous verbal or written requests. If the requestor wishes to pursue the relief and remedies provided for in this Act, the request must be in writing. (Section 702.) Written requests need not include an explanation why information is sought or the intended use of the information unless otherwise required by law. (Section 703.)*

October 30, 2020

Do not incur any fees prior to duplication or transmission. If fees are assessed for electronic delivery of documents, email (preferred) or fax, then all records requested will be inspected in person to avoid a fee.

1. I am seeking electronic copies of the business license that was issued by West Easton Borough Hall to Tricia Mezzacappa, timeframe 2011-2012, which was the result of a successful zoning appeal decided in favor of Mezzacappa. The business license sought is for a home based massage therapy business.

2. I am seeking electronic copies of the business license that was issued by West Easton Borough Hall to Dan DePaul and or / Lorainna Telepo, timeframe 2011-2012, which was the result of a successful zoning appeal decided in favor of Councilman Dan Depaul and his girlfriend Lorainna Teleppo (formerly residing with Dan DePaul) . The business license sought is for a home based massage therapy business.

3. I am seeking electronic copies of all zoning appeal records regarding the hearings listed in paragraphs 1 and 2 above, including all transcripts on file at West Easton Borough Hall.

4. I am seeking electronic copies of records in custody and control of West Easton Borough which support / substantiate the sworn affidavit of Joan Heebner dated July 8, 2020, in OOR Appeal 2020-0998 . The records sought include all directives , messages, notes, papers, emails or other communications from Council President to Joan Heebner (page 2 of 20, paragraph 7) "directing her" to log onto craigslist every day in 2009 while at Borough Hall to stalk the craigslist postings that were never posted by me , but included stolen photos , partially clothed , and photoshopped to present me as a prostitute soliciting massage services. The ads which are the subject of this request relate to a series of Zoning Board hearings regarding the home based massage businesses of both Councilman Daniel DePaul and myself, time frame 2009 to 2011, which West Easton battled for 3 years and lost.

5. I am seeking electronic copies of the ads that were the subject of a July 10, 2020 email sent from Joan Heebner to Erin Burlew, esq, and myself, that are currently stored at West Easton Borough hall , from a website "Backpage.com" and "Craigslist.com" depicting me as a prostitute soliciting massage services / and or other services . The ads sought are all ads that were collected by West Easton Borough clerk Joan Heebner, or other employees and elected officials, which were downloaded, photographed, stored , emailed and disseminated. I am seeking the ads with or without stolen photos of me from 20 years ago, which were photoshopped and "repeatedly posted every day" , according to affidavit of Joan Heebener.

6. I am seeking all correspondences, emails, notes, texts, etc that directed Joan Heebner or others to download all ads posted by Tricia Mezzacappa on the internet

advertising massage therapy services. (Time frames from 2009 to 2012).

7. I am specifically seeking the advertisement that was posted by Councilman Matthew Dees on March 19, 2020 entitled "Constable Tricia Mezzacappa needed a "handyman", with a craigslist posting date of 5/27/2009. The ad....[http://westeastonpa.com/constable-tricia-mezzacappa-needed-a-handyman/.....](http://westeastonpa.com/constable-tricia-mezzacappa-needed-a-handyman/) depicted me with stolen and photoshopped half nude photos that were pasted onto a craigslist ad depicting me as a prostitute. It is published on his social medial platform that he uses to communicate Borough transactions and activities with Borough residents.

8. I am seeking all correspondences, emails, notes, texts, etc and phone bills which discuss the massage therapy advertisements that are the subject of a blog post listed above in paragraph 7.

9. I am seeking all emails sent to and from Joan Heebner, Dave Gehman, Matthew Dees and Dan Depaul from 2019 to present to third party contractor Advanced Disposal regarding garbage collection in this Borough.

10. I would like to inspect (no copies) all paid invoices from January 2020 to present

11. I would like to inspect all zoning files from 2009 to 2012 regarding massage therapy businesses in the Borough, and all 2019- 2020 files that included code inspections, violations, and/ or zoning hearings. (12)