

No. 18-8848

In the
Supreme Court of the United States



ANTYANE ROBINSON,

Petitioner,

v.

COMMONWEALTH OF PENNSYLVANIA,

Respondent.

On Petition for a Writ of Certiorari to the
Supreme Court of Pennsylvania, Eastern District

**BRIEF OF RESPONDENT
COMMONWEALTH OF PENNSYLVANIA
IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI**

M.L. EBERT, JR.
CUMBERLAND COUNTY DISTRICT ATTORNEY
COURTNEY E. HAIR
CHIEF DEPUTY DISTRICT ATTORNEY
COUNSEL OF RECORD
CUMBERLAND COUNTY COURTHOUSE
ONE COURTHOUSE SQUARE
CARLISLE, PA 17013
(717) 240-6210
CHAIR@CCPA.NET

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***** CAPITAL CASE *****

COUNTER STATEMENT OF THE QUESTIONS INVOLVED

1. Does this Honorable Court possess jurisdiction to grant a writ of certiorari where the Pennsylvania State Court's ruling was based on an adequate and independent state ground?

2. Did the Pennsylvania Supreme Court commit a legal error against previous precedent including *Rippo v. Baker*, 137 S.Ct. 905 (2017)?

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COUNTER STATEMENT OF THE CASE

On March 13, 1997, Antyane Robinson (hereinafter “Petitioner”) was convicted of Murder in the First Degree,¹ Attempted Criminal Homicide,² Aggravated Assault,³ Crimes Committed with Firearms,⁴ and Firearms not to be Carried Without a License.⁵ The facts of the case are as follows.

On June 19, 1996, Tara Hodge left work and returned to her home at 117 West Louthier Street, Carlisle, Cumberland County, Pennsylvania. (Notes of Testimony at Trial (hereinafter “N.T. ___”) at 58, 76.) Once there, she waited for her boyfriend of about one month, Rashawn Bass. (N.T. 71, 77.) After he arrived, the two ate a late dinner together and talked. (N.T. 78.) Around midnight, Rashawn Bass went to take a shower and Tara went to bed. (N.T. 79, 81.) Shortly thereafter, Tara heard a knock at the kitchen door and got up to answer it. (N.T. 79.) At the door was Petitioner. (N.T. 79.)

Tara Hodge had a previous relationship with Petitioner that lasted from some time in 1993 until around February 1995. (N.T. 60, 62.) Subsequently, Tara relocated to her address in Carlisle, and in March of 1996, Petitioner reestablished

¹ 18 Pa. Con. Stat. § 2501; 18 Pa. Con. Stat. § 2502.

² 18 Pa. Con. Stat. § 901; 18 Pa. Con. Stat. § 2501; 18 Pa. Con. Stat. § 2502.

³ 18 Pa. Con. Stat. § 2702(a)(1).

⁴ 18 Pa. Con. Stat. § 6103.

⁵ 18 Pa. Con. Stat. § 6016.

contact. (N.T. 66.) Tara stated that they were never in a relationship after February 1995, but that they were “intimate friends.” (N.T. 69.) In May of 1996, Tara began dating Rashawn Bass and, on June 10, 1996, she subsequently sent Petitioner a letter stating that she was going to “move on.” (N.T. 71, 74.)

After Tara answered the kitchen door and while Rashawn was in the shower, Petitioner entered the apartment. (N.T. 79.) Tara returned to the bedroom with Petitioner following her. (N.T. 80.) Petitioner repeatedly questioned Tara as to who was in the shower and told her to tell that person to leave. (N.T. 80.) At one point, Petitioner banged on the bathroom door and made a motion as if he was going to hit Tara. (N.T. 80.) Tara insisted that she was not going to tell Rashawn to leave and informed Petitioner that if he continued to behave in such a manner that he should be the one to leave the apartment. (N.T. 81.)

Petitioner then pulled out a gun that was concealed in his pants and shot Tara Hodge. (N.T. 81.) Tara stated that she heard three “pops” and then fell to the ground unconscious. (N.T. 82.) Tara eventually regained consciousness and went into the bathroom where she found the deceased body of Rashawn Bass in the shower. (N.T. 83.) She left her apartment, found help, and police came to the scene. (N.T. 84.) Tara was treated at Carlisle Hospital and then flown to Hershey Medical Center. (N.T. 87.)

Tara identified Petitioner as the person who shot her. (N.T. 26.) After an investigation, the police obtained a photograph of Petitioner, a number for Petitioner’s pager, and a description of Petitioner’s vehicle. (N.T. 128.) Using this

and other information, Petitioner was apprehended in Prince George's County, Maryland and brought back to Cumberland County, Pennsylvania to face trial. (N.T. 128.) Petitioner was convicted on March 13, 1997, and on March 14, 1997, he was sentenced to death.

On November 24, 1998, the Pennsylvania Supreme Court affirmed Petitioner's convictions and judgment of sentence. *Commonwealth v. Robinson*, 721 A.2d 344 (Pa. 1998). In January of 2000, this Honorable Court denied certiorari. *Robinson v. United States*, 528 U.S. 1082 (2000). Subsequently, Petitioner filed his first Post-Conviction Relief Act (hereinafter "PCRA") Petition. After hearing, the petition was denied on June 22, 2005, by the state Trial Court. Thereafter, the Pennsylvania Supreme Court affirmed the Trial Court's denial. *Commonwealth v. Robinson*, 877 A.2d 433 (Pa. 2005).

On August 8, 2005, Petitioner sought federal habeas relief, which was ultimately denied on October 5, 2015, when this Honorable Court denied certiorari to the Third Circuit Court of Appeals. *Robinson v. Wetzel*, 136 S.Ct. 53 (2015). Thereafter, on October 1, 2013, Petitioner filed his Second PCRA Petition. After appointment of counsel, numerous delays, the Trial Court's Notice to Dismiss, the appointment of new counsel, and more delays, the Trial Court dismissed this Second PCRA Petition on August 17, 2015, as serial and untimely. On June 20, 2016, the Pennsylvania Supreme Court denied his appeal. *Commonwealth v. Robinson*, 139 A.3d 178 (Pa. 2016).

On November 10, 2015, Petitioner was notified of his execution to take place on December 18, 2015. Petitioner sought a stay with the Pennsylvania Supreme Court, but was denied relief. However, on December 16, 2015, Governor Thomas Wolf granted a temporary reprieve of his execution. During that time, Petitioner filed a Third PCRA Petition on November 30, 2015, raising an issue regarding former Pennsylvania Supreme Court Justice Eakin's emails, which was dismissed for lack of jurisdiction. On January 7, 2016, Petitioner appealed. After a motion for reconsideration was filed and denied, on January 8, 2016, the Trial Court ultimately vacated its decision and all of the Common Pleas Judges of the 21st Judicial District were recused from hearing the Third PCRA Petition. An out-of-county jurist was obtained, and, after a series of motions, briefings, orders, and hearings, the Trial Court ultimately dismissed the petition as untimely on July 31, 2017. Petitioner appealed this denial and the Pennsylvania Supreme Court denied his relief on December 14, 2018. *Commonwealth v. Robinson*, 198 A.3d 340 (Pa. 2018).

Relevant to this Petition for Certiorari, during the years of post-trial litigation, Petitioner raised challenges alleging racial bias. In his initial PCRA Petition, Petitioner argued his counsel was ineffective for failing to object to the prosecutor's allegedly improper, race-based arguments. With citations to the record and controlling precedent, the Pennsylvania Supreme Court denied his claims. *Commonwealth v. Robinson*, 877 A.2d 433 (Pa. 2005).

Petitioner's race-based prosecutorial misconduct argument was exhaustively analyzed and denied on habeas review in federal court. *Robinson v. Beard*, 2011 U.S. Dist. LEXIS 112326, at 111*-115 (M.D. Pa. 2011). Specifically, the Middle District of Pennsylvania rejected Petitioner's argument that the prosecutor "injected race" into the case and that the prosecutor's comments had "highly improper, racial overtones" during the guilt phase of trial. The Third Circuit Court of Appeals, in addressing a penalty-phase issue, commented on the prosecutor's use of certain terminology and pointed out the relevance of such language. Specifically, the Third Circuit Court of Appeal stated "[t]he prosecutor's statements characterizing Robinson as a 'dangerous big city hoodlum,' as well as the evidence regarding [his] ownership of guns and his criminal past, conveyed Robinson's specific intent to kill Bass and Hodge." *Robinson v. Beard*, 762 F.3d 316 (3d Cir. 2014), *certiorari denied*, 136 S.Ct. 53 (2014).

Former Justice Eakin was publicly implicated in a statewide email scandal as early as October 2014 by his colleague, former Justice Seamus McCaffery. Public news articles indicated former Justice Eakin trafficked in racially insensitive and offensive emails.⁶ On October 17, 2014, then-Justice Eakin authored a Press

⁶ See e.g. Phillymag.com, "(UPDATE) Pa. Supreme Court Justice: McCaffery Threatened to Release Emails: Supreme Court Justice J. Michael Eakin received explicit email forwards at Yahoo! email account. He says Justice Seamus McCaffery had threatened to release them earlier." October 17, 2014; Philly.com, "Pa. Supreme Court meltdown over e-mails worsens," October 18, 2014; Pennlive.com, "Colleague says Pa. Supreme Court justice in porn email case threatened he was: 'not going down alone,'" October 17, 2014.

Release that confirmed he received “inappropriate material” in his emails.⁷ While attempting to vest jurisdiction in the Trial Court over this email controversy, Petitioner relied on public news releases made in October 2015.

In dismissing his Third PCRA Petition, the Trial Court held:

Justice Eakin was publically tied to the email scandal on October 18, 2014, and potentially earlier. This information was public knowledge, having been published in news sources (including the source which [Petitioner] used as the foundation of his petition, albeit at a much later date). While the full extent of the scandal was not known in October of 2014, the available information was sufficient to form the basis of [Petitioner’s] claim. As [Petitioner] was represented by counsel at that time, it is presumed that he had access to this publically available information and was required to file the petition within 60 days of that date, by December 17, 2014. 42 Pa. Con. Stat. § 9545(b)(2). This petition was filed on November 30, 2015, and was therefore untimely under 42 Pa. Con. Stat. § 9545(b)(2).

(Opinion Pursuant to Pa.R.A.P. 1925(a), October 23, 2017, (Herman, S.J., specially presiding) (hereinafter “Trial Court Opinion ____” at 7.) The Trial Court went on to explain:

While the facts underlying his claim reflect a disturbing state of affairs within the Pennsylvania Judiciary, Defendant did not demonstrate that this circumstance existed during the time of his conviction and appeal or that it affected his case in any way. No evidence was produced or alluded to that discusses or touches on Defendant’s case specifically. Likewise, his discovery request was not for specific, known, material, but rather he cast a wide net, hoping to snare something of both relevance and substance. Such a discovery request within the framework of collateral relief is a forbidden fishing expedition. Assuming the instant PCRA petition was timely filed, Defendant failed to demonstrate the exceptional circumstances required for any discovery and, even if discovery was appropriate, Defendant’s generic, all-encompassing discovery request would have been impermissible.

(Trial Court Opinion 14.)

⁷ J. Michael Eakin, Justice, Press Release: October 17, 2014, found at <https://www.post-gazette.com/attachment/2014/10/17/J-Michael-Eakin-s-statement-and-letter-to-Judicial-Conduct-Board.pdf>.

Petitioner appealed the Trial Court's decision to the Pennsylvania Supreme Court. Ultimately, the Pennsylvania Supreme Court affirmed the Trial Court's Opinion by operation of law. *Commonwealth v. Robinson*, 198 A.3d 340 (Pa. 2018); republished at *Commonwealth v. Robinson*, -- A.3d --, 2018 WL 7620332 (Pa. 2018). The Pennsylvania Supreme Court justices were equally divided on whether Petitioner's Third PCRA Petition was time barred with two justices agreeing with the Trial Court that the claim is untimely and two justices believing it to be timely (the three remaining justices did not participate in the consideration or decision of the case). *Id.* The multiple justices who found the Petitioner's Third PCRA Petition to be untimely further opined that the emails in question were sent and received decades after Petitioner's case, were not relevant to his case, or showed actual bias on the part of former Justice Eakin. *Id.* However, although these facts played into both Justice Dougherty's and Justice Mundy's opinions, Petitioner's appeal was denied by operation of law.

Petitioner has now filed the instant Petition for Writ of Certiorari to the Supreme Court of Pennsylvania. In his Petition for Writ of Certiorari, Petitioner argues that this Honorable Court should grant certiorari and remand the case for further proceedings because the Pennsylvania Supreme Court has committed fatal errors. However, Petitioner continues to ignore the lack of jurisdiction for his claims and the complete lack of merit. As such, and pursuant to Rule 15.1, the Commonwealth files this Brief in Opposition.



SUMMARY OF THE ARGUMENT

A Writ of Certiorari to the Supreme Court of Pennsylvania should be denied. First, Petitioner has attempted to improperly vest jurisdiction with this Honorable Court. The Pennsylvania Supreme Court's, and previously the Pennsylvania Trial Court's, rulings were based on an adequate and independent state procedural ground. Specifically, the Pennsylvania Courts concluded that Petitioner failed to meet the time restrictions under the PCRA and thus, the Court could not hear the merits of Petitioner's claims. Petitioner also claims that the Pennsylvania Supreme Court made the same fatal error as the Nevada Supreme Court in *Rippo v. Baker* which this Honorable Court remanded for further proceedings. However, not only are the facts of this case completely not analogous to the facts in *Rippo*, but Petitioner fails to acknowledge that the Pennsylvania Supreme Court Justices' analysis of actual bias had no bearing on the actual ruling. Essentially, Petitioner tries to manufacture jurisdiction to keep his case before the courts. As such, this Honorable Court should deny his Petition for Certiorari.



ARGUMENT

I. THERE IS NO JURISDICTION TO PROCEED WITH CERTIORARI BECAUSE THE PENNSYLVANIA SUPREME COURT'S RULING WAS BASED ON AN ADEQUATE AND INDEPENDENT STATE PROCEDURAL GROUND.

The Trial Court and subsequently, by operation of law, the Pennsylvania Supreme Court held, that there was no jurisdiction to decide Petitioner's serial, patently untimely petition under the Post-Conviction Relief Act. 42 Pa. Con. Stat. § 9541 and sequential. The statute setting forth the time for filing a PCRA Petition states:

- (1) Any petition under this subchapter, including a second or subsequent petition, shall be filed within one year of the date the judgment becomes final, unless the petition alleges and the petitioner proves that:
 - (i) The failure to raise the claim previously was the result of interference by government officials with the presentation of the claim in violation of the Constitution or laws of this Commonwealth or the Constitution or laws of the United States;
 - (ii) The facts upon which the claim is predicated were unknown to the petitioner and could not have been ascertained by the exercise of due diligence;
 - (iii) The right asserted in a constitutional right that was recognized by the Supreme Court of the United States or the Supreme Court of Pennsylvania after the time period provided in this section and has been held by the court apply retroactively.

42 Pa. Con. Stat. § 9545(b)(1). The Pennsylvania Supreme Court held that "PCRA time restrictions are jurisdictional in nature; [and] consequently Pennsylvania courts may not entertain untimely appeals." *Commonwealth v. Watts*, 23 A.3d 980, 983 (Pa. 2011). For an exception to apply the petitioner must allege and prove that

his case falls within one of the delineated exceptions. *Commonwealth v. Fahy*, 737 A.2d 214, 218 (Pa. 1999).

Here the Trial Court clearly found that Petitioner did not meet the timeliness exceptions. As stated by the Trial Court, “[a] petitioner may not avoid a time bar by tailoring the factual basis of his claim in such a way as to misrepresent the actual nature of the claim raised.” (Trial Court Opinion 4.) “The date of the public availability of facts, rather than the publication of a specific report on a compilation of those facts, controls for the purposes of the PCRA time bar.” (Trial Court Opinion 4.) As Petitioner did not file his Third PCRA Petition until well after the alleged racial bias of former Justice Eakin was publicly available, he failed to satisfy the jurisdictional requirements of the PCRA. The Pennsylvania Supreme Court, although unable to reach a clear majority, affirmed the Trial Court’s dismissal of Petitioner’s Third PCRA. While Petitioner analyzes the dicta in each justice’s opinion, this has no bearing. Petitioner was unable to vest jurisdiction in the state courts and he is unable to vest it here.

Further, this Honorable Court has repeatedly denied certiorari when the state courts have denied appeals on state procedural grounds. *See e.g., Commonwealth v. Taylor*, 67 A.3d 1245 (Pa. 2013), *cert. denied, Taylor v. Pennsylvania*, 527 U.S. 1151 (2014); *Commonwealth v. Edmiston*, 65 A.3d 339 (Pa. 2013), *cert. denied, Edmiston v. Pennsylvania*, 571 U.S. 1026 (2013). As the Pennsylvania Supreme Court clearly held that there was no jurisdiction to decide Petitioner’s serial and untimely filing, this Honorable Court should not accept certiorari. The Pennsylvania Court’s

decisions were all based on adequate and independent state grounds and should not be disturbed. Petitioner should not be afforded unlimited appeals simply based on the sentence received.

II. THIS HONORABLE COURT SHOULD DENY CERTIORARI AS THE PENNSYLVANIA SUPREME COURT DID NOT COMMIT ANY LEGAL ERROR.

In his request for a writ of certiorari, Petitioner relies on *Rippo v. Baker* and alleges that the Pennsylvania Supreme Court made the same fatal error as the Nevada Supreme Court. *Rippo v. Baker*, 137 S.Ct. 905 (2017). In *Rippo v. Baker*, Rippo was convicted of first-degree murder and related offenses and sentenced to death by a Nevada jury. *Id.* at 906. During his trial, Rippo learned that the presiding judge was the target of a federal bribery probe and that the District Attorney's Office was participating in the investigation. *Id.* Although Rippo immediately raised a bias claim and asked for the judge to be disqualified under the Due Process Clause of the Fourteenth Amendment, the claim was denied. *Id.* Ultimately, in a post-conviction proceeding, Rippo raised his bias claim again which was dismissed by the Nevada Supreme Court on the theory that there was no actual bias. *Id.* at 906-07.

This Honorable Court granted certiorari and remanded for further proceedings holding that "the Due Process Clause may sometimes demand recusal even when a judge has no actual bias. Recusal is required when, objectively speaking, the probability of actual bias on the part of the judge or decision maker is too high to be constitutionally tolerable." *Id.* (internal quotations omitted) (quoting *Aetna Life*

Insurance Company v. Lavoie, 475 U.S. 813, 825 (1986), *Withrow v. Larkin*, 421 U.S. 35 (1975)).

Although Petitioner claims that the Pennsylvania Supreme Court failed to apply the proper analysis to bias, this is simply not the case as each justice that participated in the decision first opined on the timeliness of Petitioner's Third PCRA Petition. When two of the four participating justices found the petition to be untimely, no further analysis was necessary, as the decision of the Trial Court would be affirmed as a matter of law. It is immaterial to the final holding that Justice Dougherty and Justice Mundy found no actual bias by former Justice Eakin as Petitioner failed to meet the threshold of timeliness to vest jurisdiction in the state court in the first place.

Petitioner further contends that the alleged "error" is not isolated and points to other decided and pending appeals related to the Eakin email controversy. Specially, Petitioner cites *Commonwealth v. Blakeney*. *Commonwealth v. Blakeney*, 193 A.3d 350 (Pa. 2018.) What Petitioner fails to distinguish, however, is that in *Blakeney*, the justices that write in affirmation of the trial court's dismissal specifically disagree that the emails are "new facts" under the PCRA time-bar exception. *Id.* at 367, 370. There is never a discussion on whether Blakeney raised his claim within sixty days of the previously unknown facts first became available and also ignores that the Commonwealth conceded that the Blakeney's petition was timely pursuant to 42 Pa. Con. Stat. § 9545(b)(1)(ii).

Petitioner further cites to several pending appeals with the Pennsylvania Supreme Court including *Commonwealth v. Taylor* (docketed at No. 767 CAP) and *Commonwealth v. Koehler*, (docketed at No. 768 CAP). This just highlights the fact that multiple capital defendants are attempting to use the statewide email scandal in order to get their cases back before the court. Untimely PCRA Petitions with unsubstantiated claims of bias erected solely to keep old capital cases alive do not compel the valuable time and efforts of this Honorable Court. While the seemingly endless cycle of litigation continues to spin, Tara Hodge and the family members of Rashawn Bass continue to bravely wait for justice.



CONCLUSION

For all the reasons set forth herein, this Honorable Court should deny Petitioner's Petition for Writ of Certiorari to the Supreme Court of Pennsylvania.

Respectfully submitted,

Courtney E. Hair

COURTNEY E. HAIR
CHIEF DEPUTY DISTRICT ATTORNEY
COUNSEL OF RECORD
CUMBERLAND COUNTY COURTHOUSE
ONE COURTHOUSE SQUARE
CARLISLE, PA 17013
(717) 240-6210
CHAIR@CCPA.NET

M.L. EBERT, JR.
CUMBERLAND COUNTY DISTRICT ATTORNEY

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