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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

**Jamar Patterson and Abron Ash,**

*Petitioners,*

v.

**The Commonwealth of Pennsylvania and Larry  
Krasner, In His Official Capacity as the District  
Attorney of Philadelphia,**

*Respondents.*

No. \_\_\_\_\_

**PETITION FOR REVIEW IN  
THE NATURE OF AN ACTION  
FOR DECLARATORY AND  
INJUNCTIVE RELIEF**

## 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 thirty (30) days, or within the time set by order of the court, after this petition for review 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 claimed in the complaint or for any other claims or relief requested by the plaintiff. You may lose money or property or other rights important to you.

*You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.*

Dauphin County Bar Association  
Lawyer Referral Service  
213 North Front Street  
Harrisburg, PA 17101  
(717) 232-7536

## AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted treinta (30) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objections a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y require que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

*Lleva esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.*

Colegio de Abogados de Condado de  
Dauphin  
Abogado Servicio de Referencia  
213 North Front Street  
Harrisburg, PA 17101  
(717) 232-7536

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Jamar Patterson and Abron Ash,

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v.

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No. \_\_\_\_\_

**PETITION FOR REVIEW IN  
THE NATURE OF AN ACTION  
FOR DECLARATORY AND  
INJUNCTIVE RELIEF**

**TO:**

**The Commonwealth of Pennsylvania**  
Pennsylvania Office of Attorney General  
Strawberry Square, 16th Floor  
Harrisburg, PA 17120

**District Attorney Larry Krasner**  
Philadelphia District Attorney's Office  
3 South Penn Square  
Philadelphia, PA 19107

**NOTICE TO PLEAD**

You are hereby notified to file a written response to the enclosed Petition for Review within thirty (30) days from service hereof or a judgment may be entered against you.

BY: Benjamin D. Geffen, ID No. 310134  
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**PETITION FOR REVIEW IN THE NATURE OF AN ACTION FOR  
DECLARATORY AND INJUNCTIVE RELIEF**

Petitioners, by and through their counsel, for their Petition for Review in the Nature of an Action for Declaratory and Injunctive Relief against Respondents, state and allege as follows:

**INTRODUCTION**

1. The Private Detective Act of 1953, 22 P.S. §§ 11-30 (the “PDA”), imposes an irrebuttable lifetime ban on employment in security and property protection jobs for many qualified individuals with criminal records, *id.* § 23(a), 23(b)(4) (“Employment Ban”). Petitioners, both of whom are qualified security job candidates, bring this action to challenge the constitutionality of this Employment Ban, which unreasonably and unnecessarily infringes upon the right to engage in an occupation under Article I, § 1 of the Pennsylvania Constitution.

2. Petitioners’ experiences exemplify the injustice and irrationality of the PDA’s Employment Ban. Petitioner Jamar Patterson was arrested for drug-related offenses in 2005, when he was 19 years old. In the nearly 20 years since he was convicted of those charges, he has maintained a clean record and a steady history of employment. Since July 2022, Mr. Patterson has worked successfully for a utility company as a field technician, visiting the homes of customers experiencing utility-related problems. However, Mr. Patterson was denied employment as an unarmed guard securing the exterior of that same company’s facility buildings

solely due to the PDA's Employment Ban, which permanently forbids his employment as a security guard because of his long-ago criminal conviction. *See* 22 P.S. § 23(a)(6). Petitioner Abron Ash, who had worked since 2017 as a security guard in safety-sensitive positions, was recently fired from his job as a result of 2006 misdemeanors for simple assault, reckless endangerment, and possession of an instrument of crime that arose out of an incident of self-defense. *See id.* § 23(a)(10), (12). The PDA irrebuttably presumes that these Petitioners' convictions, and the old, unrelated convictions of many others like them, render them forever unfit to hold any position governed by the PDA.

3. The PDA's Employment Ban is unreasonable and runs contrary to social science research demonstrating that criminal history often has no predictive value or material impact on a worker's ability to succeed at a job. As studies have repeatedly shown, the vast majority of employees with criminal histories do not pose a workplace safety risk, and after a certain period of time has passed, a person with a conviction is no more likely to commit a crime than someone who has never been convicted. As research has found, the recidivism risk of those with a prior criminal record falls below the risk of arrest for the general population approximately after four to seven years for individuals convicted of violent

offenses, four years for individuals convicted of drug offenses, and three to four years for individuals convicted of property offenses.<sup>1</sup>

4. Reflecting this understanding, in 2015 this Court declared the Older Adults Protective Services Act’s lifetime criminal record ban facially unconstitutional and unenforceable, explaining that the “blanket prohibition lacks fine-tuning because it treats all the enumerated crimes, regardless of their vintage or severity, as the same even though they present very different risks of employment.” *Peake v. Commonwealth*, 132 A.3d 506, 521-22 (Pa. Cmwlth. 2015) (en banc).

5. The Court’s decision in *Peake* relied upon a long line of cases finding similar lifetime employment bans unconstitutional in a variety of contexts, including schools and childcare facilities. For example, the Court held in 2003 that the Child Protective Services Law’s “lifetime ban of previously convicted applicants from employment in child-care is unconstitutional.” *Warren Cty. Human Servs. v. State Civil Serv. Comm’n (Roberts)*, 844 A.2d 70, 74 (Pa.

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<sup>1</sup> See, e.g., Alfred Blumstein & Kimonori Nakamura, *Extension of Current Estimates of Redemption Times: Robustness Testing, Out-of-State Arrests, and Racial Differences*, National Institute of Justice (2012); Alfred Blumstein & Kiminori Nakamura, *Redemption in the Presence of Widespread Criminal Background Checks*, 47 *Criminology* 327 (2009); Jennifer Hickes Lundquist et al., *Does a Criminal Past Predict Worker Performance? Evidence from One of America’s Largest Employers*, 96 *Soc. Forces* 1039 (2018); Dylan Minor et al., *Criminal Background and Job Performance*, 7 *IZA J. Lab. Pol’y* (Sept. 2018).

Cmwlth. 2003). The Court observed that “[s]uch a ban ‘runs afoul of the deeply ingrained public policy of this State to avoid unwarranted stigmatization of and unreasonable restrictions upon former offenders.’” *Id.* (quoting *Sec’y of Revenue v. John’s Vending Corp.*, 309 A.2d 358, 362 (Pa. 1973)). Numerous other decisions have rejected irrebuttable lifetime employment bars based on similar reasoning. *E.g.*, *Nixon v. Commonwealth*, 789 A.2d 376, 382 (Pa. Cmwlth. 2001) (en banc) (Older Adults Protective Services Act); *Johnson v. Allegheny Intermediate Unit*, 59 A.3d 10, 25 (Pa. Cmwlth. 2012) (en banc) (Public School Code); *Jones v. Penn Delco Sch. Dist.*, No. 294 MD 2012, 2012 Pa. WL 8668277, at \*7 (Pa. Cmwlth. Dec. 13, 2012) (en banc) (Public School Code); *Croll v. Harrisburg Sch. Dist.*, No. 210 MD 2012, 2012 Pa. WL 8668130, at \*7 (Pa. Cmwlth. Dec. 13, 2012) (en banc) (Public School Code); *Ake v. Bureau of Prof’l & Occupational Affairs*, 974 A.2d 514, 520, 522 (Pa. Cmwlth. 2008) (Certified Public Accountant Law).

6. The PDA’s Employment Ban is likewise unconstitutional, on both a facial and as-applied basis. It permanently and unreasonably prohibits Petitioners and many other qualified workers like them from pursuing an occupation in the security industry, in violation of their substantive due process rights under Article I, § 1 of the Pennsylvania Constitution.

## **JURISDICTION AND VENUE**

7. Jurisdiction is proper under 42 Pa.C.S. § 761(a). This is an action brought against, *inter alia*, the Commonwealth government.

8. Because jurisdiction is proper and exclusive in this Court, venue is proper as well.<sup>2</sup>

9. This Court may grant declaratory relief pursuant to the Declaratory Judgments Act, 42 Pa.C.S. §§ 7531-7541.

## **PARTIES**

### **I. Petitioners**

#### **A. Jamar Patterson**

10. Jamar Patterson is a 37-year-old resident of Philadelphia with a high school diploma, a long history of successful employment, and significant customer service experience.

11. Around March 2022, Mr. Patterson applied for a position as a Security Professional with Allied Universal Security Services (hereafter “Allied”). This position would have required him to secure the outside of approximately eight buildings in Philadelphia belonging to a utility company, driving to the locations and walking around the properties to make sure the doors were locked. Mr.

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<sup>2</sup> See *Barr v. Bureau of Prof'l & Occupational Affairs*, 803 A.2d 243, 247 (Pa. Cmwlth. 2002) (“Here, by virtue of 42 Pa.C.S. § 761(a), this Court has jurisdiction over Barr’s mandamus action, and this Court’s jurisdiction is primary over any rule regarding venue.”).



Patterson was interested in the position, which involved weekend shifts, as a source of supplemental income.

12. Mr. Patterson interviewed for the position and on April 8, 2022 Allied determined he was qualified for the job and made a conditional offer of employment. The offer was contingent upon a drug test and a criminal background check.

13. In April 2022, Mr. Patterson passed the required drug test and attended an orientation for the Security Professional position. During the orientation, Allied asked Mr. Patterson about his criminal record, and he disclosed that he had an old felony conviction related to drugs.

14. Mr. Patterson was arrested in March 2005, when he was 19 years old, for possession of a controlled substance with intent to sell, along with related charges. He was convicted of the charges in November 2005. Since then, he has never been charged with or convicted of another crime.

15. After Mr. Patterson informed Allied that he had a criminal record, Allied rescinded the offer of employment. He subsequently received paperwork from Allied explaining that this rejection was due to the Private Detective Act. The paperwork stated: "A review of the [criminal record] report provided by the state determined the conviction violates Allied Universal's Private Detective License. In accordance with Allied Universal's Private Detective License, Allied Universal

will not knowingly employ anyone who has been convicted of a Felony or any misdemeanor that violates this license.”

16. Soon after Allied rescinded his offer of employment, Mr. Patterson obtained a different position as a Field Technician working directly for the same utility company. As a Field Technician, Mr. Patterson is entrusted with visiting peoples’ homes to address utility-related problems, with the goal of protecting persons and property while avoiding utility shut-offs whenever possible. Thus, while the Private Detective Act barred Mr. Patterson from a position securing the exteriors of the utility company’s buildings, he has been found qualified for a position allowing him inside the homes of customers of the utility company.

17. Mr. Patterson has successfully performed his job duties since he began his Field Technician role in July 2022, and has since been promoted to the position of “Cadet” after completing a training period and passing exams. However, he is still seeking a security position to provide supplemental income.

**B. Abron Ash**

18. Abron Ash is a 49-year-old resident of Philadelphia. He is a graduate of Abington Senior High School. He holds Class G and Class D security officer

licenses in Florida, which allow him to work in that state as, respectively, an armed or unarmed security officer guard.

19. Mr. Ash started working in the security field in 2017, when he was hired by McGinn Security to work at the Philadelphia International Airport. When Allied Universal Security Services acquired McGinn, Mr. Ash continued working for Allied in the same job until September 2022, when he relocated to Florida. While in Florida, he again worked as a security officer, first for Allied, and then for Guardian Security.

20. In April 2023, Mr. Ash decided to return to Philadelphia and successfully sought work with his former employer, Allied. He was assigned to an unarmed security job at a Wells Fargo Bank branch in Philadelphia.

21. Mr. Ash worked at the bank branch only one day before Allied fired him on the basis of his criminal record on May 9, 2023. Allied's termination papers state that the reason for the termination was "Criminal Conviction – Violation of Private Detective License."

22. Mr. Ash has been convicted on only one occasion of charges above the level of a summary offense, in a 17-year-old case that arose from a fight instigated by a coworker. In 2006, Mr. Ash was found guilty of misdemeanors related to the physical altercation (simple assault, reckless endangerment, and possession of an instrument of crime), and sentenced to probation, which he served

without incident. In the nearly two decades since, Mr. Ash has never been charged with or convicted of another crime.

23. Despite Mr. Ash's long employment history with Allied, the age of his convictions, and his qualification for the security position at Wells Fargo, the PDA's Employment Ban permanently disqualifies Mr. Ash from working as a security guard in Pennsylvania.

24. Consequently, Mr. Ash is unable to continue working in the occupation of his choice. He lost a job paying him \$17.25/hour and now works as a dishwasher.

## **II. Respondents**

25. The Commonwealth of Pennsylvania is a state sovereign governmental unit providing for subnational governance of the Commonwealth of Pennsylvania. The Commonwealth has a duty to enforce its statutes, including to defend the constitutionality of its statutes in litigation. This is particularly true when no specific officer or agency of the Commonwealth administers the challenged law, as is the case with the PDA.

26. The Honorable Larry Krasner is sued in his official capacity as the District Attorney of Philadelphia and the leader of the Philadelphia District Attorney's Office. The PDA delegates to local district attorneys like the Philadelphia District Attorney the power and responsibility to enforce the

provisions of the PDA, including the Employment Ban at issue in this lawsuit. *See* 22 P.S. §§ 15(a), 27. The PDA authorizes Respondent Krasner to investigate suspected violations of the Act, *id.* § 15, and to criminally prosecute employers who employ disqualified individuals, *id.* §§ 23(a), 27.

## **FACTUAL ALLEGATIONS**

### **I. The Private Detective Act’s Employment Ban**

27. The Private Detective Act of 1953, as amended, has been in effect for seventy years.

28. The PDA governs a wide variety of jobs in security and property protection in the Commonwealth, including employment in any “business of watch, guard or patrol agency” that “patrols, guards, protects, monitors, regulates, secures or watches over persons and/or property, either real or personal.” *See* 22 P.S. § 12(a), (e). While the term “private detective” may call to mind a cinematic archetype like Sam Spade, the PDA also covers the far more common job of private security guard, as regularly seen in stores, shopping malls, and other public accommodations. *See id.* § 12(e).

29. The PDA requires any “person, partnership, association or corporation” seeking to engage in a covered activity to demonstrate that it meets certain statutory requirements and to obtain a license through the Court of Common Pleas. *See* 22 P.S. §§ 13(a), 14. The PDA license requirement applies to

security firms, including large companies such as Allied, that wish to conduct business in Pennsylvania, as well as applying to small businesses focused on more traditional detective work.

30. The PDA prohibits such license holders from employing a person who has ever been convicted of any felony or any of a broad list of lower-level offenses (collectively “Disqualifying Offenses”). 22 P.S. § 23(a), (b)(4). This makes it impossible for people with Disqualifying Offenses ever to hold jobs with license holders in Pennsylvania.

31. A PDA license holder that knowingly employs a person who has been convicted of a Disqualifying Offense can be prosecuted by a district attorney, including Respondent Krasner, and upon conviction, “shall be sentenced to pay a fine of not more than five thousand dollars (\$5000) or to undergo imprisonment for not more than one (1) year, or both.” 22 P.S. § 23(a). The license would also be subject to revocation. *Id.*

32. Disqualifying Offenses include relatively minor misdemeanors such as possession of a small quantity of a drug, *see* 22 P.S. § 23(a)(6), “picking pockets or attempting to do so,” *id.* § 23(a)(7), and a broad catchall prohibition on “any offense involving moral turpitude,” *see id.* § 23(b)(4). Another Disqualifying Offense—“soliciting any person to commit sodomy or other lewdness,” *id.* § 23(a)(8)—epitomizes the PDA’s obsolescence. *See generally Commonwealth v.*

*Bonadio*, 415 A.2d 47 (Pa. 1980) (striking as unconstitutional the Voluntary Deviate Sexual Intercourse Statute).

33. These exclusions are not time-limited, and license holders are not permitted to make an individualized determination that exclusions should not apply to a particular job applicant. *See* 22 P.S. § 23(a). As a result, the Employment Ban is permanent and absolute. Regardless of how old or minor the Disqualifying Offense is, whether the Offense relates to the duties of the job, or what the applicant has done in the years since the conviction, the applicant's fate is sealed. The PDA renders the applicant's criminal history unreviewable and dispositive.<sup>3</sup>

34. The PDA's exclusions prevent employers from hiring employees whom they would deem qualified, exacerbating labor market shortages in the security field.

## **II. Injury to Petitioners**

35. The PDA's Employment Ban unlawfully and irrationally prohibits Petitioners and similarly situated people with criminal records from participating in a growing industry that is important to public safety and that provides jobs with sustainable wages, good benefits, and opportunities for career advancement.

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<sup>3</sup> If an individual receives a pardon, the individual can then be eligible for employment under the PDA. 22 P.S. § 23(a). However, pardons are a very difficult and limited remedy—in 2022, only 100 individuals received gubernatorial pardons, out of 572 people whose applications reached the merit-review stage. These numbers are tiny in comparison to the hundreds of thousands of Pennsylvanians who have convictions that would bar them under the PDA.

36. In doing so, the PDA increases the already significant barriers to employment faced by the estimated 1 in 3 working-age individuals with criminal records.<sup>4</sup> These individuals often face a host of challenges in the labor market. Employer bias drastically reduces the callback and hire rates of candidates with criminal histories.<sup>5</sup> Job applicants who have served time in prison may also suffer from gaps in educational attainment: more than half of formerly incarcerated individuals hold only a high school diploma or GED. As a result, about 27% of formerly incarcerated people are unemployed,<sup>6</sup> and those with lower levels of formal education face even higher unemployment rates.<sup>7</sup>

37. Many jobs governed by the PDA would provide people with criminal records a meaningful opportunity to participate in the workforce. Security positions often do not require a college degree and provide better wages and benefits than other entry-level work. According to the U.S. Bureau of Labor Statistics, the

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<sup>4</sup> U.S. Dep't of Justice, Bureau of Justice Statistics, *Survey of State Criminal History Information Systems, 2012* (Jan. 2014), <https://www.ncjrs.gov/pdffiles1/bjs/grants/244563.pdf>.

<sup>5</sup> See, e.g., Harry J. Holzer et al., *Will Employers Hire Ex-Offenders? Employer Preferences, Background Checks, and Their Determinants*, Institute for Research on Poverty, Discussion Paper No. 1243-02 at 9, <https://www.irp.wisc.edu/publications/dps/pdfs/dp124302.pdf>; Devah Pager, *The Mark of a Criminal Record*, 108 Am. J. Soc. 937 (2003).

<sup>6</sup> See Lucius Couloute & Daniel Kopf, *Out of Prison & Out of Work: Unemployment Among Formerly Incarcerated People*, Prison Policy Initiative (July 2018), <https://www.prisonpolicy.org/reports/outofwork.html>.

<sup>7</sup> See Lucius Couloute, *Getting Back On Course: Educational Exclusion and Attainment Among Formerly Incarcerated People*, Prison Policy Initiative (Oct. 2018), <https://www.prisonpolicy.org/reports/education.html>.



median annual income for a security guard is \$31,470, or about \$15 per hour,<sup>8</sup> which is double Pennsylvania’s minimum wage of \$7.25 per hour. In Philadelphia, 22% of workers in the sector earn between \$39,000 and \$58,000 annually.<sup>9</sup> Full-time positions can offer healthcare, retirement benefits, and paid training. Security employment will likely grow by 3% per year over the next 10 years.<sup>10</sup>

38. But the PDA permanently shuts qualified workers like Petitioners out of this occupation, narrowing an already tight job market and relegating individuals with criminal records to a sentence of chronic unemployment and underemployment—a punishment lasting far longer than any sentences imposed in their criminal cases.

## CAUSE OF ACTION

### Article I, Section 1 of the Pennsylvania Constitution

39. Petitioners incorporate by reference all of the allegations in the preceding paragraphs.

40. The provisions of the Private Detective Act of 1953 that ban employment for people with criminal records, 22 P.S. § 23(a), 23(b)(4), violate

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<sup>8</sup> U.S. Bureau of Labor Statistics, *Occupational Outlook Handbook, Security Guards and Gambling Surveillance Officers, Summary*, <https://www.bls.gov/ooh/protective-service/security-guards.htm#tab-1> (last visited June 20, 2023).

<sup>9</sup> See Pew Charitable Trusts, *How Can Philadelphia Grow Middle-Wage Jobs?* (Nov. 16, 2022), available at <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2022/11/how-can-philadelphia-grow-middle-wage-jobs>.

<sup>10</sup> U.S. Bureau of Labor Statistics, *Occupational Outlook Handbook, Security Guards and Gambling Surveillance Officers, Job Outlook*, <https://www.bls.gov/ooh/protective-service/security-guards.htm#tab-6> (last visited June 20, 2023).

Article I, § 1 of the Constitution of Pennsylvania, both facially and as applied to Petitioners, by violating the rights of Petitioners and many other Pennsylvanians to engage in a particular occupation for which they are otherwise qualified.

41. The provisions of the Private Detective Act of 1953 that ban employment for people with criminal records, 22 P.S. § 23(a), (b)(4), violate the right to due process inherent in Article I, § 1 of the Constitution of Pennsylvania, both facially and as applied to Petitioners, by unreasonably and irrebuttably presuming that Petitioners and other job-seekers with criminal records are permanently unqualified for employment in the security sector.

42. The provisions of the Private Detective Act of 1953 that ban employment for people with criminal records, 22 P.S. § 23(a), 23(b)(4), violate due process as guaranteed by Article I, § 1 of the Constitution of Pennsylvania, both facially and as applied to Petitioners, because they go beyond the necessities of the case and are not substantially related to any reasonable objectives such as protecting clients of private detective agencies or the general public.

### **PRAYER FOR RELIEF**

WHEREFORE, Petitioners pray that this Court:

43. Declare the provisions of the Private Detective Act of 1953 that ban employment for people with criminal records, 22 P.S. § 23(a), 23(b)(4), to be unconstitutional, invalid, and illegal as violative of the Pennsylvania Constitution,

because those provisions permanently and irrebuttably bar Petitioners and similarly situated individuals from eligibility for employment as security guards;

44. Enjoin Respondents from enforcing the provisions of the Private Detective Act of 1953 that ban employment for people with criminal records, 22 P.S. § 23(a), 23(b)(4), against any of the Petitioners or against any similarly situated individuals, including by prosecuting anyone for employing Petitioners or any similarly situated individuals; and

45. Provide such other and further relief as this Court deems just and proper.

DATED: June 26, 2023

Respectfully submitted,

Sharon M. Dietrich, ID No. 44464  
Jamie Gullen, ID No. 314518  
Katie Svoboda-Kindle, ID No. 319048  
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/s/ Benjamin D. Geffen  
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*Attorneys for Petitioners*

## VERIFICATION

I, Jamar Patterson, hereby state:

1. The statements made in the foregoing Petition for Review are true and correct to the best of my own personal knowledge, information, and belief;  
and
2. I understand that false statements herein are subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Jamar Patterson

Dated: June 20, 2023

## VERIFICATION

I, Abron Ash, hereby state:

1. The statements made in the foregoing Petition for Review are true and correct to the best of my own personal knowledge, information, and belief;  
and
2. I understand that false statements herein are subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, reading "Abron B. Ash", is written over a horizontal line.

Dated: June 15<sup>th</sup>, 2023