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IN THE COURT OF COMMON PLEAS MONTGOMERY COUNTY, PA

IN RE:

SUPREME COURT OF PENNSYLVANIA
NO. 197 M.D.D MISC. KT 2012

THE THIRTY-FIFTH STATEWIDE
INVESTIGATING GRAND JURY

MONTGOMERY COUNTY COMMON PLEAS
M.D. 2644-2012

**ANSWER OF SPECIAL PROSECUTOR
TO THE EMERGENCY APPLICATION FOR STAY OF PRESENTMENT
OF ATTORNEY GENERAL KATHLEEN G. KANE, INDIV.**

Thomas E. Carluccio, Special Prosecutor to the Investigatory Grand Jury hereby answers the *Emergency Application for Stay of Presentment* filed by, Attorney General Kathleen G. Kane, indiv. (the "Applicant"), and states in support thereof as follows:

1. Admitted.
2. Denied. After reasonable investigation, the Respondent is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph and are therefore denied. 1 By way of further answer, it is denied that a Stay of the Presentment would be in the interest of justice for reasons advanced by the Applicant. To the contrary, the Presentment is the by-product of a properly convened statewide investigating grand jury, and the efforts of the Special Prosecutor lawfully appointed thereto. In effect, the Presentment

¹ It is understood that Applicant has filed an Emergency Application seeking a Stay in the presentation of a Presentment issued by the underlying Thirty-Fifth Statewide Investigating Grand Jury, which Applicant presumes has already been delivered due to recent reports in the news media. As such, it would appear that Applicant more effectively does not seek a Stay of the Presentment, but rather a Stay on any action in response to the alleged Presentment by the District Attorney to whom such Presentment would have been directed.

Received in Supreme Court

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represents a recommendation to the Supervising Judge and referred to the applicable District Attorney for further investigation and prosecution only where warranted. As such, the delivery of any Presentment, as alleged in the underlying Application, should not be viewed as imposing "irreparable harm" to the Applicant, where such harm has risen to the level warranting immediate review in view of considerations of public importance.

3. Admitted in part and Denied in part. It is admitted that the Hon. William R. Carpenter, Supervising Judge of the Thirty-Fifth Statewide Investigating Grand Jury accepted Presentment by such Grand Jury on or about 12/19/14. Any representation, whether expressed or implied, into the substance of the Presentment, is denied.

4. Denied. The averments contained in this Paragraph constitute conclusions of law to which no responsive pleading is required. Notwithstanding, the Grand Jury indeed maintains legal power and authority to issue the Presentment.

As previously stated in the Special Prosecutor's Memorandum in Support of his Answer to the Applicant's preceding Quo Warranto Action, under both statute and the Pennsylvania Constitution, the Thirty-Fifth Investigating Grand Jury was empanelled and supervised in accordance with the requirements of 42 §4544(a), notably under Application for an Order Directing that a Multicounty Grand Jury be Convened by the then Attorney General Linda Kelly. A copy of the Application is attached hereto, made a part hereof and marked **Exhibit A**. Further, upon such Application, This Honorable Court issued its Order of 10/4/2012 designating the Hon. William R. Carpenter of the 38th Judicial District, Montgomery County, Pennsylvania as the subject Supervising Judge. A copy of the aforementioned Order is attached hereto, made a part hereof and marked **Exhibit B**.

In view of the Application and Order, consistent with law and the Pennsylvania Constitution, the Supervising Judge maintains the plenary power to supervise the proceedings of the applicable grand Jury and to appoint a Special Prosecutor where warranted. Such action was undertaken here, and is not out of the ordinary – as charged by the Applicant.

5. Admitted in part and Denied in part. It is admitted that the Applicant has pending before this Honorable Court a Quo Warranto Action. It is denied that the referenced Quo Warranto Action challenging the appointment and authority of a Special Prosecutor to the underlying Grand Jury has merit under law. To the contrary, there is sufficient legal precedent for a Supervising Judge to appoint a special prosecutor and/or oversee grand jury proceedings. See *In re Dauphin County Fourth Investigating Grand Jury*, 610 Pa. 296, 19 A.3d 491 (2014); *In Re Twenty-Fourth Statewide Investigating Grand Jury*, 907 A.2d 505 (Pa. 2006); *In re June 1979 Allegheny County Investigating Grand Jury*, 415 A.2d 73, 78 (Pa. 1980). *Castellani v. The Scranton Times*, 956 A.2d 937 (PA. 2008). Here, Supervising Judge Carpenter was well within his plenary rights recognized under the aforementioned case law to oversee the Grand Jury in appointing a Special Prosecutor.

By way of further answer, it is acknowledged that there is no statutory or case law directly on point to address the unique situation of an investigation into the OAG for possible improper disclosures of information and/or documentation subject to ongoing grand jury secrecy protections. Taken to its logical conclusion, the Applicant advocates for the OAG to effectively investigate itself into possible improper leaks, and in advancing such position completely disregards the inherent conflicts of interest, and diminution in public confidence and trust in any holder of the position of Attorney General and the OAG by any such entangled outcome.

Indeed, a claim can be made that to permit such an illogical result warrants the appointment of a Special Prosecutor in the public interest, as was undertaken here by actions taken by Supervising Judge Carpenter. Moreover, Supervising Judge Carpenter's represented in informing this Honorable Court of his appointment that he would at all times take into consideration any thoughts contesting his decision. It is noted that no concerns opposing Judge Carpenter's election to appoint a Special Prosecutor were made by this Honorable Court, nor by any District Attorney.

Finally, Applicant represents that the case *Smith v. Gallagher, 185 A.2d 135 (1962)* is dispositive that a Court does not maintain authority under law to supersede the role of the Attorney General, as an impermissible violation of the constitutional separation of powers by the judiciary. In previous pleadings filed by the Special Prosecutor and Opinions filed by Supervising Carpenter, the holding in *Smith v. Gallagher* was distinguished from the underlying matter. In short, *Smith v. Gallagher* addressed whether a Judge may empanel a Special Grand Jury and appoint a Special Prosecutor to investigate alleged improprieties in the awarding of city contracts. Acknowledging that the District Attorney might have been involved in the matter under investigation, Judge Alessandroni made his appointment of a Special Prosecutor without first referring the oversight of grand jury proceedings to the Attorney General. The Court in *Smith v. Gallagher* recognized that the Attorney General's office appeared able to assume its oversight role with the subject grand jury.

Here no Special Grand Jury was empanelled, and it is clear that the Attorney General's office is not in a position absent a clear conflict-in-interest to assume its oversight role with the subject grand jury. As such, Judge Carpenter's decision, with this Court's approval, to appoint a

Special Prosecutor is entirely appropriate. Chief Justice Bell's expansive dissent and concurring opinion addressed a situation similar to that here where neither the District Attorney nor the Attorney General are properly qualified to assume a supervisory role with the grand jury. Here, the leak of information and documentation subject to grand jury secrecy protection occurred in an unknown locale within the state, thereby precluding Judge Carpenter's ability to effectively identify the proper District Attorney to whom to refer the investigation. Of consequence, the leak came from the OAG, and as such conflicts-in-interest could not be overcome in referring the matter to the Attorney General. Under such circumstances, appointment of a Special Prosecutor presented the clear, straightforward and appropriate resolution of the concern on the part of Judge Carpenter.

Perhaps, Chief Justice Bell best addressed the situation in his dissent and concurrence, where he stated:

What happens to the public interest safety and welfare, when for any reason whatsoever both a District Attorney and an Attorney General are disqualified or fail to act promptly, impartially and adequately in the circumstances? Are the people of that County to be left unprotected? To answer "yes" would be ridiculous. Yet unless the Courts have inherent power - under those unusual circumstances - to appoint special investigating and/or prosecuting attorneys, an entire law abiding community can be left without adequate protection and redress against crime and corruption. Can any person believe that Courts are so impotent and so oblivious of obvious public duty that they cannot and will not do whatever may be necessary to require a prompt and impartial investigation in order to protect the public?

The courts under our Constitution have certain inherent rights and powers which do not depend solely upon express constitutional or legislative grants. They may do all things that are reasonably necessary for the administration of justice within the scope of their jurisdiction. *Smith v. Gallagher*, 408 Pa. 551, 646 (1962).

6. Denied. The averments contained in this Paragraph constitute conclusions of law to

which no responsive pleading is required. Notwithstanding, the representation that any action taken by the Montgomery County District Attorney to prosecute one or more persons as a result of the Presentment is denied. To the contrary, if the Presentment provides a reasonable and sound basis for its conclusions, and such conclusions are substantiated to the reasonable standards of the District Attorney, then prosecutions are warranted and serve the public interest to address criminal conduct. Should the Applicant be the subject of any such prosecution, then such is the natural consequence of improper conduct on her part.

7. Denied. The averments contained in this Paragraph constitute conclusions of law to which no responsive pleading is required. By way of further answer, for the reasons articulated above, there are not interests of justice and at law which warrant requiring the District of Attorney from taking any action in response to the Presentment.

STATEMENT OF FACTS

8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.

STATEMENT OF FACTS

12. Denied. For the reasons articulated above, Judge Carpenter appointed a Special Prosecutor to the Thirty-Fifth Statewide Investigating Grand Jury in furtherance of the plenary powers he maintains in supervising the proceedings of an Grand Jury where circumstances warranted. It is acknowledged that no statutory law is directly on point with this concern. However, it is clear that a lineage of applicable law is dispositive on the concern – all of which recognize a Supervising Judge’s authority to appoint a Special Prosecutor.

13. Denied. It is again denied that Judge Carpenter exceeded his authority under law in appointing a Special Prosecutor, and that challenges to such appointment are moot because a Presentment was issued. Query whether the Applicant’s real issue is not with the existence of a Presentment issued by an investigating grand jury, or one that is issued with the assistance of the appointed Special Prosecutor here, even where such challenge is not made with an ancillary challenge to objectivity or other conduct on the part of the Special Prosecutor serving to prejudice the underlying Investigating Grand Jury.

14. Denied. For the reasons articulated above, the relief requested by the Applicant to avoid immediate and irreparable harm asserted to be unwarranted under the circumstances, is denied.

WHEREFORE, the *Emergency Application to Stay Presentment* filed by Attorney

General Kane, Indiv. should be denied.

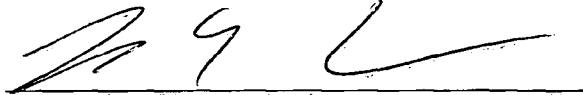


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(484) 674-2899
Special Prosecutor of Investigating Grand Jury No. #35

DATED: 1/15/15

VERIFICATION

I, Thomas E. Carluccio, Esq. as Special Prosecutor to the Investigating Grand Jury No #35 appointed by the Pennsylvania Supreme Court, hereby state that after due diligence and investigation into the operative events underlying the subject matter of the *Quo Warranto Action* filed of record with the Court by Attorney General Kathleen G. Kane, indiv., I hereby represent that the averments set forth in the foregoing Answer to the said Action are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.



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Special Prosecutor of Investigating Grand Jury No. #35

 **Exhibit “A”**

[Application of A.G. Linda Kelly for Multicounty Investigating Grand Jury]

IN THE SUPREME COURT OF PENNSYLVANIA
WESTERN DISTRICT

IN RE: APPLICATION OF LINDA L. KELLY, :
ATTORNEY GENERAL OF THE :
COMMONWEALTH OF PENNSYLVANIA, : NO. 176
REQUESTING AN ORDER DIRECTING THAT AN :
ADDITIONAL MULTICOUNTY INVESTIGATING : MISC. DOCKET 2012
GRAND JURY HAVING STATEWIDE :
JURISDICTION BE CONVENED :

APPLICATION REQUESTING AN ORDER DIRECTING
THAT AN ADDITIONAL MULTICOUNTY INVESTIGATING GRAND
JURY HAVING STATEWIDE JURISDICTION BE CONVENED

TO THE HONORABLE RONALD D. CASTILLE, CHIEF JUSTICE OF
PENNSYLVANIA:


AND NOW, comes Linda L. Kelly, Attorney General of the Commonwealth of Pennsylvania, who makes application pursuant to the Investigating Grand Jury Act, 42 Pa.C.S. §§ 4541 *et seq.*, for the creation of an additional multicounty investigating grand jury having statewide jurisdiction, and in support thereof avers as follows:

1. On June 23, 2010, upon the application of the Attorney General, the Court issued an Order directing that an additional multicounty investigating grand jury having statewide jurisdiction—the Thirty-Second Statewide Investigating Grand Jury—be convened.

2. The Thirty-Second Statewide Investigating Grand Jury was impaneled in Norristown, Montgomery County, on October 26, 2010.

TRUE & CORRECT COPY

ATTEST: OCT - 5 2012


ELIZABETH E. ZISK
CHIEF CLERK

3. By majority vote on February 29, 2012, the Thirty-Second Statewide Investigating Grand Jury voted to expand its term by a period of 6 months.

4. The last session of the Thirty-Second Statewide Investigating Grand Jury is October 19, 2012, and the Thirty-Second Statewide Investigating Grand Jury expires on October 26, 2012.

5. A total of 132 criminal investigations have been submitted to the Thirty-Second Statewide Investigating Grand Jury to date, 106 of which involve allegations of organized crime or public corruption or both.

6. Of those 132 investigations, 35 investigations will not be completed prior to the expiration of the Thirty-Second Statewide Investigating Grand Jury and will continue to require the investigative resources of a statewide investigative grand jury. Of these 35 investigations, 33 involve allegations of organized crime or public corruption or both. Another 6 investigations that will be ready to be presented to the proposed new grand jury will be new investigations. All of these new investigations involve allegations of organized crime or public corruption or both.

7. There are currently two other active statewide investigating grand juries in the Commonwealth of Pennsylvania:

A. The Thirty-Third Investigating Grand Jury was created by this Court's Order of November 27, 2010, and is located in Harrisburg, Dauphin County. The Supervising Judge of this grand jury is the Honorable Barry Feudale. This grand jury was impaneled on March 7, 2011, and its term will expire on March 7, 2013, with a final scheduled session on February 15, 2013, the grand jury having voted to extend its term.

B. The Thirty-Fourth Statewide Investigating Grand Jury was created by this Court's Order of April 14, 2011, 2011, and is located in Pittsburgh, Allegheny County. The Supervising Judge of this grand jury is the Honorable Norman H. Krumenacker. This grand jury was impaneled on August 8, 2011, and its term will expire on February 8, 2013, with a final scheduled session on January 18, 2013, unless the grand jury votes to extend its term.

8. The 41 investigations described above that will require the resources of a statewide investigating grand jury cannot be adequately conducted by the Thirty-Third Statewide Investigating Grand Jury located in Harrisburg. This grand jury is currently running at full capacity, operating one full week per month, Monday through Friday, from 8:30 a.m. to 5:00 p.m. A total of 48 investigations have been submitted to this grand jury to date, 16 of which involve allegations of organized crime or public corruption or both. As the date on which this grand jury will expire approaches, it is anticipated that the presentation of evidence will accelerate so that investigations may be completed before its expiration.

9. The 41 investigations described above that require the resources of a statewide investigating grand jury cannot be adequately conducted by the Thirty-Fourth Statewide Investigating Grand Jury located in Pittsburgh. This grand jury, which was impaneled on August 8, 2011, is currently running at full capacity, operating one full week per month, Monday through Friday, from 8:30 a.m. to 5:00 p.m. A total of 41 investigations have been submitted to this grand jury to date, 30 of which involve allegations of organized crime or public corruption or both. As the date on which this grand jury will expire approaches, it is anticipated that the

presentation of evidence will accelerate so that investigations may be completed before its expiration.

10. Moreover, the 41 investigations described above that require the resources of a statewide investigating grand jury originate in the eastern district of Pennsylvania. Transporting witnesses and evidence from Norristown to the middle and western districts of Pennsylvania is impractical and costly, and, in my opinion as Attorney General, would prevent the Commonwealth from adequately and effectively conducting these investigations

11. The 41 investigations described above that require the resources of a grand jury cannot be adequately conducted by a county grand jury because venue over these investigations lies throughout numerous counties in Pennsylvania.

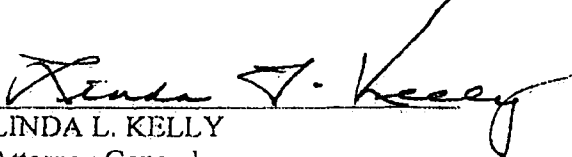
12. In my judgment as Attorney General:

- A. The convening of an additional statewide investigating grand jury is necessary because of organized crime or public corruption or both involving more than one county of the Commonwealth;
- B. The investigation of organized crime or public corruption or both cannot be adequately performed by a county investigating grand jury available under section 4543 of the Investigating Grand Jury Act, 42 Pa. C.S. § 4543;
- C. The volume of work of the Thirty-Third and Thirty-Fourth Statewide Investigating Grand Juries exceeds the capacity of these grand juries both to discharge their obligations and to assume the obligations of the Thirty-Second Statewide Investigating Grand Jury; and

D. The powers of an additional statewide investigating grand jury are needed to fully and adequately investigate organized crime and public corruption in Pennsylvania. Because persons with knowledge of these activities are often unwilling to discuss them, the ability of the grand jury to compel the attendance of witnesses and to compel their testimony under oath is needed. The ability to take testimony under oath is also needed in order to preserve the testimony of these witnesses for later evidentiary use in the event the witnesses testify differently at trial. The ability to apply for orders of immunity for witnesses involved in organized crime and public corruption is also needed in order for the Commonwealth to conduct a full and adequate investigation of these illicit activities. In my experience, persons or entities involved in these activities often keep records describing their activities. The power of the grand jury to compel the production of this documentary evidence is also required in order to conduct a full and adequate investigation.

WHEREFORE, the Attorney General of the Commonwealth of Pennsylvania respectfully requests that this Honorable Court, within 10 days of the filing of this application, issue an order directing that an additional multicounty investigating grand jury having statewide jurisdiction be convened, pursuant to the provisions of Sections 4544 and 4547 of the Investigating Grand Jury Act, 42 Pa. C.S. §§ 4544, 4547. Because there exist throughout the Commonwealth criminal activities encompassed in the definition of organized crime and public corruption as set forth in the Act that require the resources of an additional multicounty investigating grand jury for proper and complete investigation, and because Montgomery County is reasonably accessible to persons having business with the grand jury due to available transportation facilities, it is further requested that this Honorable Court designate Montgomery County as the location for the additional multicounty investigating grand jury having statewide jurisdiction.

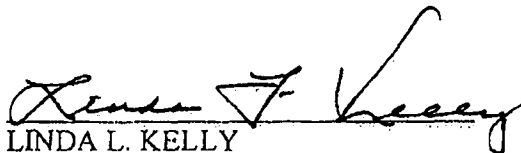
Respectfully submitted,


LINDA L. KELLY
Attorney General
Commonwealth of Pennsylvania

Date: August 18, 2012

VERIFICATION

I, LINDA L. KELLY, Attorney General of the Commonwealth of Pennsylvania, hereby verify that the facts set forth in the foregoing application are true and correct to be the best of my knowledge or information and belief. This verification is given subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.



LINDA L. KELLY
Attorney General
Commonwealth of Pennsylvania

Date: August 28, 2012

 **Exhibit “B”**

[Order of Hon. William R. Carpenter Granting Application of A.G. Linda Kelly]

IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT

IN RE: APPLICATION OF LINDA L. KELLY, :
ATTORNEY GENERAL OF THE :
COMMONWEALTH OF PENNSYLVANIA, : NO. 176
REQUESTING AN ORDER DIRECTING THAT AN :
ADDITIONAL MULTICOUNTY INVESTIGATING : MISC. DOCKET 2012
GRAND JURY HAVING STATEWIDE :
JURISDICTION BE CONVENED :

ORDER OF COURT

AND NOW, this 4th day of OCTOBER, 2012, upon consideration of the application of Linda L. Kelly, Attorney General of the Commonwealth of Pennsylvania, and it appearing to the Court that the granting of the application is appropriate under the Investigating Grand Jury Act, 42 Pa.C.S. § 4541 *et seq.*, it is hereby ORDERED as follows:

1. The Acting Attorney General's application requesting an order directing that an additional multicounty investigating grand jury having statewide jurisdiction ("Thirty-Fifth Statewide Investigating Grand Jury") be convened is hereby GRANTED.

2. The Honorable WILLIAM R. CARPENTER, Judge of the Court of Common Pleas, 38th Judicial District, MONTGOMERY County, Pennsylvania, is hereby designated as Supervising Judge of the Thirty-Fifth Statewide Investigating Grand Jury. All applications and motions relating to the work of the Thirty-Fifth Statewide Investigating Grand Jury—including motions for disclosure of grand jury transcripts and evidence—shall be presented to said Supervising Judge. With respect to investigations, presentments, reports, and all other proper activities of the Thirty-Fifth Statewide Investigating Grand Jury, Judge WILLIAM R. CARPENTER, as Supervising Judge, shall have jurisdiction over all counties throughout the Commonwealth of Pennsylvania. Judge

WILLIAM R. CARPENTER may temporarily designate another Judge who has been appointed by this Court as the Supervising Judge of a multicounty grand jury having statewide jurisdiction to act as Acting Supervising Judge of the Thirty-Fifth Statewide Investigating Grand Jury when he is absent or otherwise unavailable.

3. Montgomery County is designated as the location for the Thirty-Fifth Statewide Investigating Grand Jury proceedings.


4. The Court Administrator of Pennsylvania is directed to draw six counties at random from the eastern district of Pennsylvania, pursuant to the provisions of Rule 241(a)(1) of the Pennsylvania Rules of Criminal Procedure, Pa. R. Crim. P. 241(a)(1), and that these six counties, plus Montgomery County, shall together supply jurors for the Thirty-Fifth Statewide Investigating Grand Jury.

5. The Court Administrator of Pennsylvania is directed to obtain the names and addresses of persons residing in the aforesaid counties who are eligible by law to serve as grand jurors, pursuant to the provisions of Rule 241(a)(2) of the Pennsylvania Rules of Criminal Procedure, Pa. R. Crim. P. 241(a)(2).

6. The total of such names of prospective jurors to be collected shall be 200, of which 50 shall be selected at random and summoned by the Court Administrator of Pennsylvania to Montgomery County. The Supervising Judge shall impanel the investigating grand jury from this panel of 50 prospective jurors. If it becomes necessary, additional prospective jurors shall be summoned by the Supervising Judge from among the remaining 150 prospective jurors.

7. The Thirty-Fifth Investigating Grand Jury will remain in session for not more than 18 months following the date that it is impaneled by the Supervising Judge.

8. The Attorney General of the Commonwealth of Pennsylvania, or her designee in charge of the Thirty-Fifth Statewide Investigating Grand Jury, may apply, if necessary, to the Supervising Judge for an extension of the term of the Thirty-Fifth Statewide Investigating Grand Jury for an additional period of up to six months, if, at the end of its original term, the investigating grand jury determines by majority vote that it has not completed its business. The grand jury's term, including any extension thereof, shall not exceed 24 months from the date it was originally impaneled by the Supervising Judge.


RONALD D. CASTILLE
Chief Justice of Pennsylvania

TRUE & CORRECT COPY

ATTEST: OCT - 5 2012


ELIZABETH E. ZISK
CHIEF CLERK

IN THE COURT OF COMMON PLEAS MONTGOMERY COUNTY, PA

IN RE:

THE THIRTY-FIFTH STATEWIDE
INVESTIGATING GRAND JURY

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SUPREME COURT OF PENNSYLVANIA
NO. 197 M.D.D MISC. KT 2012

MONTGOMERY COUNTY COMMON PLEAS
M.D. 2644-2012

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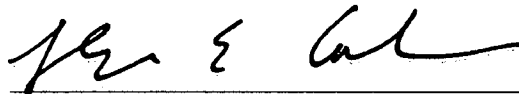
CERTIFICATE OF SERVICE

I, Thomas E. Carluccio, Esquire do hereby certify that a true and correct copy of the *Answer of Special Prosecutor to the Emergency Application for Stay of Presentment* filed by Attorney General Kane, *Indiv.* has been filed of record with the Pennsylvania Supreme Court , and a copy of which has been directed on the 15th day of January, 2015 by first class U.S. Mail, postage prepaid, to all parties in interest, as follows:

Amil M. Minora, Esq.
700 Vine Street
Scranton, PA 18510

Gerald L. Shargel, Esq.
200 Park Avenue
New York, NY 10166

The Hon. William R. Carpenter
Court of Common Pleas of Montgomery County
P.O. Box 311
Norristown, PA 19404-0311



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