



**RIDER**

and	:
	:
<b>TJUH SYSTEM</b>	:
111 South 11 <sup>th</sup> Street	:
Philadelphia, PA 19107	:
	:
and	:
	:
<b>JEFFERSON MEDICAL COLLEGE</b>	:
<b>OF PHILADELPHIA</b>	:
111 South 11 <sup>th</sup> Street	:
Philadelphia, PA 19107	:
	:
and	:
	:
<b>THOMAS JEFFERSON UNIVERSITY</b>	:
<b>HOSPITALS, INC.</b>	:
111 South 11 <sup>th</sup> Street	:
Philadelphia, PA 19107	:
	:
and	:
	:
<b>JOHN DOE 1-2</b>	:
	:
	:
<i>Defendants.</i>	:

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**COMPLAINT – CIVIL ACTION**

**PRELIMINARY STATEMENT**

1. On October 4, 2021, Anrae James was hunted down and violently murdered at Thomas Jefferson University Hospital (“Jefferson Hospital”).

2. Another worker at the Jefferson Hospital, Stacey Hayes, was permitted to walk through the front doors of the Jefferson Hospital and past at least one security post despite being heavily armed.

3. Hayes was dressed in civilian attire and wearing a cross-body bag with multiple weapons in it – weapons that had been stored in a U-Haul near the hospital, where the attack was planned in advance by Hayes, an individual that the Defendants knew or should have known to be dangerous.

4. When Hayes entered the Hospital, **the front security desk was unmanned – there was not a single guard in sight.**

5. The guards had abandoned their posts.

6. As a result, Hayes, while heavily armed, walked freely into and throughout the Hospital.

7. Hayes targeted Mr. James and hunted him throughout the Hospital.

8. As is clearly displayed in surveillance video, Hayes approached Mr. James from behind while he was seated at a desk and shot him, and then, chased him down a hallway and poured bullets into his body.

9. Mr. James died horrifically on the Hospital floor. He was only 43 years old.



10. He left behind his wife, Barbara James, and three (3) children - a 17-year-old daughter, an 11-year-old son, and a 2-year-old daughter. .

11. Mr. James' death was the predictable result of Defendants' wholly inappropriate and ineffective security practices, and their failure to protect Mr. James from Stacey Hayes despite the fact that Defendants knew or should have known of Mr. Hayes' mental instability, predisposition for violence, and animus toward Mr. James.

12. The comprehensive and outrageous failures set forth herein that would have prevented this murder exemplify Defendants' reckless disregard for the safety of all individuals who entered Jefferson Hospital, including Anrae James.

#### **THE PARTIES**

13. Plaintiff, Barbara James, Individually and as Administratrix of the Estate of Anrae James, is an adult individual and citizen of the Commonwealth of Pennsylvania residing the above captioned address.

14. At all relevant times, Barbara James and Anrae James were married.

15. Defendant, Thomas Jefferson University Hospitals, Inc. ("TJUH") is a non-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with a principal place of business located at the above captioned address.

16. At all relevant times, Defendant TJUH regularly conducted business within the Commonwealth of Pennsylvania and within Philadelphia County.

17. At all relevant times, Defendant TJUH was acting by and through its agents, servants and/or employees who were acting within the course and scope of their agency, service and/or employment with TJUH.

18. Defendant, Thomas Jefferson University (“TJU”) is a non-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with a principal place of business located at the above captioned address.

19. At all relevant times, Defendant TJU regularly conducted business within the Commonwealth of Pennsylvania and within Philadelphia County.

20. At all relevant times, Defendant TJU was acting by and through its agents, servants and/or employees who were acting within the course and scope of their agency, service and/or employment with TJU.

21. Defendant, TJUH System is a non-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with a principal place of business located at the above captioned address.

22. At all relevant times, Defendant TJUH System regularly conducted business within the Commonwealth of Pennsylvania and within Philadelphia County.

23. At all relevant times, Defendant TJUH System was acting by and through its agents, servants and/or employees who were acting within the course and scope of their agency, service and/or employment with TJUH System.

24. Defendant, Jefferson Medical College of Philadelphia (“JMCP”) is a non-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with a principal place of business located at the above captioned address.

25. At all relevant times, Defendant JMCP regularly conducted business within the Commonwealth of Pennsylvania and within Philadelphia County.

26. At all relevant times, Defendant JMCP was acting by and through its agents, servants and/or employees who were acting within the course and scope of their agency, service and/or employment with JMCP.

27. Defendants, John Doe 1-2, are currently unknown corporations and/or other entities who owned, operated, controlled, and provided security services at Jefferson Hospital.

28. At all relevant times, Defendants John Doe 1-2 regularly conducted business within the Commonwealth of Pennsylvania and within Philadelphia County.

29. At all relevant times, Defendants John Doe 1-2 were acting by and through their agents, servants, and/or employees, who were acting within the course and scope of their agency, service, and/or employment with John Doe 1-2.

30. Pursuant to Pennsylvania Rule of Civil Procedure 2005, Defendants John Doe 1-2 are currently unidentified, fictitious defendants added Doe designated to this action where their actual name/identity is unknown despite a reasonable and diligent search.

31. A reasonable and diligent search was conducted to determine the actual names/identities of John Doe 1-2.

32. Plaintiff reserves the right to amend her Complaint and name said unknown entities, designed as John Doe 1-2 as aforementioned, as defendants pursuant to Pennsylvania Rules of Civil Procedure 2005 and 1033.

33. At all relevant times, Defendants TJUH, TJU, TJUH System, JMCP and John Doe 1-2 owned, operated, and controlled Jefferson Hospital.

34. At all relevant times, Defendants TJUH, TJU, TJUH System, JMCP and John Doe 1-2 oversaw the human resources department at Jefferson Hospital.

35. At all relevant times, Defendants TJUH, TJU, TJUH System, JMCP and John Doe 1-2 oversaw, supervised, managed, and controlled the employees at Jefferson Hospital, including the assignments of each of the employees at the Hospital.

36. At all relevant times, Defendants TJUH, TJU, TJUH System, JMCP and John Doe 1-2 provided, hired, contracted, retained, supervised, and/or employed security guards and security personnel working at and around Jefferson Hospital, including members of the Thomas Jefferson University Campus Security Department.

37. At all relevant times, Defendants TJUH, TJU, TJUH System, JMCP and John Doe 1-2 designed, drafted, implemented, and enforced security policies and procedures in place at Jefferson Hospital.

38. At all relevant times, Defendants TJUH, TJU, TJUH System, JMCP and John Doe 1-2 provided training, guidance, and/or instruction to the security guards and security personnel working at and around Jefferson Hospital, including members of the Thomas Jefferson University Campus Security Department.

39. At all relevant times, Defendants TJUH, TJU, TJUH System, JMCP and John Doe 1-2 designed and implemented the security systems at Jefferson Hospital.

### **FACTS**

40. In the early morning hours October 4, 2021, Anrae James was a lawful business invitee to whom the Defendants owed the highest duty of care.

41. Mr. James was working as a nursing assistant at Jefferson Hospital.

42. That evening, Stacey Hayes drove to Jefferson Hospital in a U-Haul truck which he parked several feet from the entrance of Jefferson Hospital, in plain view of Jefferson's security cameras.

43. Based upon information and belief, Hayes U-Haul truck was filled with weapons and other dangerous materials as he had planned the murder of James and his escape route after for months – even facing criminal charges that the Defendants knew or should have been aware of related to those weapons while his plan was concocted.

44. Stacey Hayes entered the Hospital through its front doors.

45. Stacey Hayes was not stopped by security despite not being schedule to work, wearing street clothes, carrying a large bag filled with firearms, and arriving in a U-Haul truck.

46. Despite not being schedule to work, wearing street clothes, carrying a large bag filled with firearms, and arriving in a U-Haul truck, Stacey Hayes was allowed to enter the Hospital behind the security desk at the entrance and without passing through security gates.

47. Hayes was not screened by a metal detector.

48. Hayes was not patted down.

49. Upon information and belief, he was not due to work at the Hospital at the time he arrived, but he was not asked any questions by security.

50. Hayes was heavily armed when he entered the hospital.

51. Hayes was carrying multiple weapons when he entered the hospital, including an assault rifle.

52. Upon information and belief, Hayes was wearing body armor when he entered the hospital.

53. When Hayes entered the Hospital, **there were no security guards manning their desks.**

54. There was not a single security guard in sight, and Hayes entered the building freely.



55. After the shooting, Hayes was able to escape and engage in an armed standoff with police due to Defendants' utter lack of security.

56. There have been dozens of criminal incidents at Jefferson Hospital, including events of violence resulting in personal injury.

57. There have been so many of these incidents that Defendants created a "Crime Log," which publicly documents the violent criminal activity occurring on Jefferson Hospital's campus.<sup>1</sup>

58. Upon information and belief, Defendants stopped publicly displaying their Crime Log in August of 2018 in light of the overwhelming number of reportable incidents.

59. These events include:

3	18-08-01715	ASSAULT	On 8/4/18 at 6:30 pm Jefferson Police Officers take visitor into custody for aggravated assault after slashing staff member with knife.
2	18-01-00080	ASSAULT	On 1/11/18 at 12:10 pm Jefferson Police Officers take individual into custody who assaulted Security Officer while being escorted from Emergency Department.
4	18-01-00205	ASSAULT	On 1/26/18 at 1:00 pm clinical employee is assaulted by patient while being discharged from the Jefferson Emergency Department.
10	17-11-00183	ROBBERY	On 11/28/17 at 11:30 am employee reported she was victim of a strong arm robbery. Incident occurred Jefferson Hospital for Neuroscience rear driveway. No injuries reported, Jefferson and Philadelphia Police investigating.

60. Despite these numerous red flags, Defendants failed to establish reasonable security methods to protect individuals at Jefferson Hospital, including Anrae James.

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<sup>1</sup> [https://www.jefferson.edu/university/security/crime\\_reporting/crime\\_log.html](https://www.jefferson.edu/university/security/crime_reporting/crime_log.html)

61. As a result, prior to this incident, Defendants had actual and/or constructive knowledge that violent crime was regularly occurring and was likely to continue occurring at their facility.

62. Despite this actual knowledge, Defendants outrageously failed to protect those lawfully on the premises at Jefferson Hospital, including Anrae James.

63. Defendants failed to adequately secure and control Jefferson Hospital.

64. From a security perspective, Jefferson Hospital was in a state of disrepair, was unreasonably dangerous, and was unsafe for its invitees, including Anrae James.

65. Defendants' failure to ensure the safety of workers at Jefferson Hospital, including Anrae James, was negligent, careless, grossly negligent, reckless, and/or wanton, and was a proximate cause of Anrae James' catastrophic injuries and death.

66. Defendants had a duty to Anrae James and all other lawful invitees to maintain Jefferson Hospital in a safe and secure condition and to guard against and/or warn of dangerous or potentially dangerous conditions existing at and about the premises and surrounding area.

67. After the incident, spokespeople for the Defendants publicly proclaimed that their security systems were lacking and made changes to prevent an incident like this from occurring again.

68. Those additional security measures included:

- a. Contracting additional security staff;
- b. Conducting further training with all security personnel;
- c. Collaborating with the Philadelphia Police Department for an enhanced police presence on the hospital campus;
- d. Initiating a more vigilant screening process for more entrances;
- e. Performing more extensive background checks of potential hires;

- f. Performing more extensive criminal background searches of present employees;
- g. Identification of risks of dangers posed by present employees;
- h. Terminating employees who pose unreasonable risks of danger to those who entered the premises;
- i. Failing to properly supervise employees who pose danger to lawful business invitees;
- j. Failing to identify employees who have personal animus for their co-workers in a manner that would subject the co-worker to imminent risk of physical harm and/or death;
- k. Subjecting all visitors, including employees, to enhanced safety screening protocols; and
- l. Closing every ground level hospital entrance that is not staffed.

69. Defendants knew before Anrae James's murder that these steps were essential to protecting the public and workers at the hospital, including Anrae James. Yet it took a horrific murder in their hospital for any change to happen.

70. Defendants' renewed and enhanced security policies and procedures amount to a tacit admission that Jefferson Hospital security was grossly inadequate.

71. Had Defendants employed improved and enhanced security systems prior to this incident, including security guards, metal detectors, and other similar efforts, Stacey Hayes would never have been able to walk into the hospital wearing body armor and carrying an assault rifle and handgun. Stacey Hayes would never have been allowed to murder Anrae James.

72. Defendants, by and through their agents, servants, workmen and/or employees, breached their duties owed to Anrae James in the above-averred manner.

73. Solely and as a direct result of the carelessness, negligence, gross negligence, recklessness, outrageous behavior, and/or other liability producing conduct of Defendants,

Plaintiff's decedent Anrae James sustained injuries that led to his death; he sustained conscious pain and suffering and fear of impending death; has sustained a permanent loss of earnings and loss of earning capacity; he has sustained permanent loss of enjoyment of life, loss of life's pleasures and loss of life's hedonic pleasures; he has been permanently prevented from performing all of his usual duties, occupations, recreational activities and avocations all to his and his beneficiaries' loss and detriment.

74. The overwhelming and tragic combination of the failures set forth herein collectively operate to prove the Defendants acted with a reckless indifference to the rights and safety of others, including Anrae James, in a manner that justifies a prayer for punitive damage relief from the jury at trial.

**COUNT I – NEGLIGENCE**  
**PLAINTIFF v. DEFENDANTS TJUH, TJU, TJUH SYSTEM, JMCP and JOHN DOE 1-2**

75. Plaintiff incorporates all preceding paragraphs in this Complaint here by reference.

76. Defendants TJUH, TJU, TJUH System, JMCP and John Doe 1-2, by and through their agents, servants, workmen and/or employees, acted negligently, carelessly, and/or recklessly, both generally and in the following particular respects:

- a. Failing to protect Plaintiff from reasonably foreseeable harmful acts of third parties;
- b. failing to have manned security desks;
- c. allowing entrances to be unmanned;
- d. allowing security guards to leave their posts;
- e. failing to exercise reasonable care and caution in protecting Plaintiff from the assault;
- f. failing to properly supervise the premises, specifically the areas of ingress and egress;

- g. failing to provide adequate protection for Plaintiff while lawfully upon said premises;
- h. failure to provide a safe environment for Plaintiff and other persons lawfully upon said premises;
- i. failure to provide appropriate and sufficient supervisory security personnel to ensure the safety of Plaintiff and persons similarly situated;
- j. failure to provide appropriate security measures, systems, and/or personnel;
- k. allowing an individual to walk into the hospital wearing body armor and carrying multiple firearms, including an assault rifle;
- l. failing to stop an off-hours employee from entering the premises;
- m. failing to recognize that Stacey Hayes was wearing body armor and carrying multiple firearms, including an assault rifle;
- n. failing to maintain and/or failing to maintain an adequate turnstile system;
- o. failing to require employees, including off-hours employees, to pass through a metal detector;
- p. failure to warn persons lawfully upon said premises of the dangerous conditions existing thereon;
- q. failing to properly train its agent, servants workers and/or employees on how to identify armed individuals;
- r. failing to have in place policies and procedures which could have been followed and which would have ensured and assured that Plaintiff would not have been violently murdered;
- s. failing to supervise its agents, servants workers and/or employees so as to assure and ensure that they were performing their duties as security personnel in a competent manner;
- t. failing to terminate employees who pose open and obvious risk of harm to lawful business invitees;
- u. failing to identify employees who have personal animus for their co-workers
- v. failure to have adequate security protocols and/or personnel on the premises to protect their employees, agents, contractors, invitees, and patrons from known dangers of violence;

- w. failing to have an adequate number of trained, qualified security employees on duty;
- x. failure to install and/or maintain functioning electronic security doors;
- y. failing to have an established firearm policy in place with respect to visitors;
- z. permitting off-hours employees to have access to the premises without sign in practices;
- aa. failure to maintain the locks on doors and entrances;
- bb. failure to secure the premises adequately;
- cc. failing to investigate and act accordingly on the suspicious presence of Stacey Hayes.
- dd. failure to develop a security plan;
- ee. failure to revise, review and implement a security plan;
- ff. failure to install adequate security cameras;
- gg. not having a manned security desk and/or station to monitor who is entering the property;
- hh. failure to inspect the property to determine the existence of dangerous conditions such as the lack of adequate security;
- ii. failure to have a controlled access point;
- jj. failure to hire a reputable and/or skilled security contractor;
- kk. failure to have 24-hour security;
- ll. failure to maintain a security presence at entrances;
- mm. failure to establish a sufficient security budget;
- nn. failure to identify individuals entering the premises;
- oo. liability under the Restatement of Torts, 323; and
- pp. liability under the Restatement of Torts, 324.

77. By reason of the carelessness, negligence, gross negligence, recklessness, and other liability-producing conduct of Defendants TJUH, TJU, TJUH System, JMCP and John Doe 1-2, Anrae James sustained injuries that led to his death; he sustained conscious pain and suffering and fear of impending death; has sustained a permanent loss of earnings and loss of earning capacity; he has sustained permanent loss of enjoyment of life, loss of life's pleasures and loss of life's

hedonic pleasures; he has been permanently prevented from performing all of his usual duties, occupations, recreational activities and avocations all to his and his beneficiaries' loss and detriment.

78. By conducting itself as set forth above, Defendants TJUH, TJU, TJUH System, JMCP and John Doe 1-2's acts and/or omissions were a substantial factor in, a factual cause of, and/or increased the risk of Anrae James's serious, debilitating, and permanent injuries, and death.

**WHEREFORE**, Plaintiff claims of Defendants, Thomas Jefferson University, TJUH System, Jefferson Medical College of Philadelphia, Thomas Jefferson University Hospitals, Inc. and John Doe 1-2, jointly and/or severally, sums in excess of the jurisdictional threshold in damages, exclusive of interest, costs, punitive damages, and delay damages pursuant to Pa.R.C.P. §238, and brings this action to recover the same.

**COUNT II – NEGLIGENCE**  
**PLAINTIFF v. TJUH INC.**

79. Plaintiff incorporates all preceding paragraphs in this Complaint here by reference.

80. Stacey Hayes and Anrae James were, at all relevant times, co-workers employed by TJUH Inc.

81. Stacey Hayes and Anrae James had been co-workers for several years prior to Hayes murdering Anrae James.

82. Upon information and belief, Hayes and Anrae James had a personal conflict.

83. Upon information and belief, Anrae James was concerned that as a result of this personal conflict, Hayes might cause harm to him.

84. Upon information and belief, Anrae James informed TJUH, its agents, and its employees that he was concerned that Hayes may try to harm him and that Hayes had a personal conflict with him.

85. Upon information and belief, Anrae James requested that TJUH, its agents, and its employees move Anrae James into a different part of the Hospital where Anrae James could work and not be nearby to Hayes.

86. Upon information and belief, TJUH ignored this request and/or failed to timely act on this request.

87. On October 4, 2021, as a result of Hayes' personal animus towards Anrae James, Hayes prepared to execute Anrae James.

88. As a result of Hayes' personal animus towards Anrae James, Hayes suited up in body armor, armed himself with a long rifle and a hand gun, and drove himself in a rented U-Haul truck to Jefferson Hospital, where Hayes knew Anrae James would be working.

89. As a result of Hayes' personal animus towards Anrae James, Hayes entered Jefferson Hospital with a single goal: kill Anrae James.

90. As a result of Hayes' personal animus towards Anrae James, Hayes hunted James down and executed him in a Hospital hallway.

91. Hayes' murder of Anrae James satisfies the "personal animus" exception to the Pennsylvania Workers' Compensation Act's exclusivity provision. See 77 P.S. § 411(1).

92. Anrae James' death was the result of an injury caused by a third person, Stacey Hayes, who intended to injure Anrae James because of reasons personal to Stacey Hayes, and not directed against Anrae James as an employee or because of his employment.

93. It is indisputable that Stacey Hayes' attack upon Anrae James was inflicted for purely personal reasons.

94. This personal animus was pre-existing, and Defendant TJUH received actual and/or constructive notice that Hayes had a personal animus toward Anrae James.



95. Defendant TJUH received actual and/or constructive notice that Hayes was likely to cause harm toward Anrae James.

96. Defendant TJUH ignored and/or failed to act upon this notice.

97. As a result, Stacey Hayes' assault upon Anrae James was foreseeable to TJUH, Stacey Hayes' employer.

98. As a result, Defendant TJUH negligently, carelessly, and recklessly failed to provide Anrae James with a safe workplace.

99. By reason of the carelessness, negligence, gross negligence, recklessness, and other liability-producing conduct of Defendant TJUH, Anrae James sustained injuries that led to his death; he sustained conscious pain and suffering and fear of impending death; has sustained a permanent loss of earnings and loss of earning capacity; he has sustained permanent loss of enjoyment of life, loss of life's pleasures and loss of life's hedonic pleasures; he has been permanently prevented from performing all of his usual duties, occupations, recreational activities and avocations all to his and his beneficiaries' loss and detriment.

100. By conducting itself as set forth above, Defendant TJUH's acts and/or omissions were a substantial factor in, a factual cause of, and/or increased the risk of Anrae James's serious, debilitating, and permanent injuries, and death.

**WHEREFORE**, Plaintiff claims of Defendant, TJUH Inc., jointly and/or severally, sums in excess of the jurisdictional threshold in damages, exclusive of interest, costs, punitive damages, and delay damages pursuant to Pa.R.C.P. §238, and brings this action to recover the same.

**COUNT III – WRONGFUL DEATH ACTION**  
**PLAINTIFF v. DEFENDANTS**

101. Plaintiff incorporates all preceding paragraphs in this Complaint here by reference.

102. Plaintiff brings this action as a personal representative of the Estate of Anrae James, on behalf of those entitled by law to recover for his wrongful death, under and by virtue of 42 Pa. C.S.A. § 8301, *et seq.*, commonly known as the Pennsylvania Wrongful Death Act.

103. No action for damages was brought by Anrae James during his lifetime as a result of the incident at issue in this case.

104. Plaintiff claims damages for the pecuniary loss suffered by decedent's beneficiaries by reason of the death of Anrae James, and specifically for reimbursement of medical expenses, funeral expenses, and expenses of administration.

105. Plaintiff, individually and as Administratrix of the Estate of Anrae James, claims for decedent's beneficiaries' damages resulting from the deprivation of comfort, aid, assistance, society and the loss of guidance and tutelage to his beneficiaries due to his death.

106. The acts and omissions set forth herein were done in a negligent, grossly negligent, willful, reckless and wanton fashion, with a conscious indifference to the rights of members of the public generally, and decedent in particular.

107. Plaintiff brings this action by virtue of, *inter alia*, 42 Pa.C.S. § 8301 and claims all damages encompassed thereby, including any and all damages members of the Estate are entitled to under Rettger v. UPMC Shadyside, 991 A.2d 915 (Pa. Super. 2010).

**WHEREFORE**, Plaintiff claims of Defendants, jointly and/or severally, sums in excess of the jurisdictional threshold in damages, exclusive of interest, costs, punitive damages and delay damages pursuant to Pa.R.C.P. §238, and brings this action to recover the same.

**COUNT IV – SURVIVAL ACTION**  
**PLAINTIFF v. DEFENDANTS**

108. Plaintiff incorporates all preceding paragraphs of this complaint herein by reference.

109. Plaintiff, Administratrix of the Estate of Anrae James, brings this action under and by virtue of 42 Pa. C.S.A. § 8302, commonly known as the Pennsylvania Survival Act.

110. The Estate of Anrae James claims damages for pain and suffering, embarrassment, humiliation, disfigurement, and loss of enjoyment of life undergone by the decedent as a result of the Defendants' tortuous conduct, up to and including the time of death, and damages for the amount that Anrae James would have earned from the date of his death to the end of his life expectancy.

111. The acts and omissions set forth herein were done in a negligent, grossly negligent, willful, reckless and wanton fashion, with a conscious indifference to the rights of members of the public generally, and decedent in particular.

**WHEREFORE**, Plaintiff claims of Defendants, jointly and/or severally, sums in excess of the jurisdictional threshold in damages, exclusive of interest, costs, punitive damages and delay damages pursuant to Pa.R.C.P. §238, and brings this action to recover the same.

**SALTZ MONGELUZZI & BENDESKY, P.C.**

BY: /s/ Steven G. Wigrizer

STEVEN G. WIGRIZER

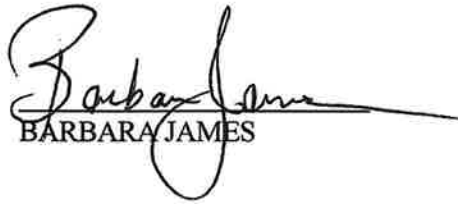
JASON S. WEISS

AIDAN B. CARICKHOFF

*Attorneys for Plaintiff*

## VERIFICATION

The averments or denials of fact contained in the foregoing are true based upon the signer's personal knowledge or information and belief. If the foregoing contains averments which are inconsistent in fact, signer has been unable, after reasonable investigation, to ascertain which of the inconsistent averments are true, but signer has knowledge or information sufficient to form a belief that one of them is true. This Verification is made subject to the penalties of the 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.



BARBARA JAMES

Date: 05/31/2022