

# A FRIEND OF THE COURT

## PSATS' LEGAL DEFENSE PARTNERSHIP Represents Townships on a Host of Issues Before the Courts

Through the Township Legal Defense Partnership, PSATS files “friend of the court” briefs to lend support in cases of statewide significance. On issues ranging from Ethics Act questions to social media posts by employees, PSATS makes sure that the “township voice” is heard loud and clear inside the highest courtrooms in Pennsylvania.

BY AMY BOBB / ASSISTANT EDITOR, PSATS

**W**hen PSATS has concerns about a current law or bill affecting townships, the Association and its members will write, call, email, text, or visit with members of the General Assembly. When it wants to make a point about a critical court case before

the state’s top judges, however, a different tack is required.

“In the judicial world, we do not have direct and ready access to judges like we do with our state legislators,” PSATS Education Director and Counsel Scott Coburn says. “Instead, our only option is to file an amicus curiae brief where we argue on paper about the issues affecting townships.”

For the past 25 years, PSATS has been filing these “friend of the court” briefs to make sure that the township voice is heard in cases of statewide significance that go before Pennsylvania’s highest courts. This past year was no different as the Township Legal Defense Partnership, PSATS’ member-supported service created for that purpose, has filed briefs in cases ranging from con-



## “Win, lose, or draw, it’s important for townships to be heard by the courts.”

flicts of interest and open records requests to ordinance challenges and the public utility status of mini cell tower providers.

In 2020, two cases have resulted in victories for townships, and three are still pending before the state Supreme Court. While the court’s decisions on two others were not necessarily the outcomes that PSATS had hoped for, the Partnership’s participation in the lawsuits ensured that the township point of view was considered by the courts, which ultimately is what the Partnership strives to achieve. *(In fact, one of the two “losses” became a win, in effect, since shortly after the court ruling, the General Assembly changed the law to benefit municipalities.)*

“Win, lose, or draw, it’s important for townships to be heard by the courts,” Coburn says.

### A strong track record

Speaking to the courts on behalf of townships has been the focus of the Township Legal Defense Partnership since PSATS launched the service in 1995. Thanks to townships’ annual financial contributions, the Partnership has filed more than 200 amicus briefs over the past quarter-century, and while not always successful, much more frequently than not, collaboration between PSATS and participating litigants has paid off for townships.

The Partnership estimates that it has been victorious in about three-fourths of the cases in which it has filed briefs, including key Supreme Court rulings

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**In the past year, the Legal Defense Partnership has filed amicus curiae briefs in cases before the state Supreme Court dealing with conflicts of interest, open records requests, employee social media policies, police standing when it comes to law enforcement databases, and the public utility status of mini cell towers.**

## How the Partnership works

Through the Township Legal Defense Partnership, PSATS gets involved in appellate-level cases that deal with far-reaching issues affecting townships across the state. Here’s how it works:

When a member township is involved in a legal case that is moving from a county court of common pleas to the appellate level, such as the Commonwealth Court, the Supreme Court, or a federal appeals court, it can ask PSATS for assistance. PSATS’ executive director, with the advice of legal counsel, carefully reviews the case to make sure the township has a good, defensible position and the outcome has the potential to affect townships statewide.

Besides specific requests from townships, PSATS will also monitor court dockets and other sources for cases dealing with issues that could establish a statewide precedent.

“Townships should understand that the Partnership does not serve as the primary attorney on a case,” PSATS Executive Director David Sanko says, “nor is the Partnership an insurance program protecting townships against the possibility of a lawsuit or guaranteeing victory once a case is taken.”

Instead, the Partnership submits supporting briefs and offers consultation on existing cases. If it decides to participate in a court case, PSATS will file an amicus curiae brief.

“Timing is critical,” Sanko says. “Townships should contact PSATS as soon as their case is appealed. That allows us time to research the case, determine the extent of our involvement, and if we decide to participate, consult with other parties to develop the brief.”

Townships that participate in the Partnership are not charged for any assistance that PSATS provides in an individual case. Rather, the program is supported through the annual contributions of many member townships with subscriptions ranging from \$55 to \$170 a year, depending on the township’s population. The costs are low considering that even a single brief filed in a court case can cost thousands of dollars.

Townships are given the option to contribute to the Partnership on the annual membership dues notice they receive from PSATS toward the end of the calendar year. In addition to representation on important cases, participants receive a quarterly newsletter with updates on key court cases.

Members’ financial contributions are used to cover the time and effort to research, write, and file briefs on behalf of townships. Because the success of the Partnership is directly linked to member participation, Sanko says, it’s critical that all townships join the Township Legal Defense Partnership and commit to holding rates steady.

“The benefits of joining are far-reaching,” he says. “The Legal Defense Partnership ensures that townships are speaking with one voice on a wide range of issues and that the message to the courts comes across loud and clear.”

To learn more about the Township Legal Defense Partnership, contact PSATS Counsel Scott Coburn at (717) 763-0930, ext. 171, or scoburn@psats.org. To seek Partnership participation in a case, send a written request to PSATS Executive Director David Sanko at dsanko@psats.org.





## LEGAL DEFENSE PARTNERSHIP

that accomplished the following goals:

- clarified that boards of auditors have no authority to impose surcharges on township officials when a township appoints an accountant to audit its finances,
- prohibited a board of auditors from significantly reducing the compensation earned by township supervisors who are also employees,
- allowed unconventional natural gas operations in an agricultural/residential zoning district that covers nearly an entire township,
- affirmed the constitutionality of the \$500,000 damages cap in the Political Subdivision Tort Claims Act, and
- allowed townships to hold closed-door, fact-finding gatherings if no deliberations or official actions take place.

“The goal of the Partnership is to go to bat for all townships in cases that have far-reaching consequences, not necessarily to keep a tally of our wins and losses,” Coburn says. “Still, it’s a good feeling to know that parties we have supported have been successful in a vast majority of the cases in which we have filed briefs.”

Last month, the Township Legal Defense Partnership celebrated its latest victory for townships when the Pennsylvania Supreme Court in *Sivick v. State Ethics Commission* ruled that a township supervisor who had approved the timesheets of his son, a member of the road crew, did not violate the Ethics Act and did not have to pay back the money that his son had earned.

Recognizing that the questions before the high court would be of concern

**“It’s really important that townships have a voice at the table, both before the legislature and the court system. Once a case goes by and gets decided, you may not be able to catch that wave again for a long time, and you’ll be stuck with the precedent you have.”**

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to township supervisors everywhere, PSATS had filed an amicus brief in support of the supervisor. The court’s decision spells good news for township supervisors who have had to be extra careful navigating the complex conflict-of-interest rules involving family members and themselves as employees.

“The Supreme Court’s ruling can now be applied to lots of other things, such as whether a supervisor can approve his or her own paycheck or that of a family member at a public meeting,” Coburn says. “As long as they are not showing preferential treatment to someone who is part of a class, such as a group of employees, supervisors would not have to recuse themselves from a vote if they choose not to do so.”

The decision also reinforced that supervisors cannot be made to pay back money to the Ethics Commission if they did not benefit directly from their conduct. Here, the commission had ordered the township supervisor to make restitution to it in the amount of \$30,000.

“Accidental violations of law, including ethics, help no one,” says Lehigh County attorney Edmund Healy, who represented the township supervisor in the case.

He notes that the State Ethics Com-

mission’s sometimes “hyper-interpretation” of the law can unintentionally create ambiguity as to what is acceptable and unacceptable conduct for public officials. By adding its voice to the equation, he says, PSATS is advocating for clear rules and consequences for all public officials and employees.

“PSATS’ dispassionate argument in this case was to point out that public officials who serve in a supervisory-employee role may need to approve and manage employees, one of whom could be a relative,” he says.

The victory for PSATS was made even sweeter by the fact that the Supreme Court referenced the Association’s brief in reaching its conclusion.

### Eyes, ears, and voice

As the voice of township government in Harrisburg, PSATS constantly monitors what is happening on Capitol Hill and in the appellate court system to make sure that townships are represented, whether it’s in debate on key legislation or arguments in a case before a court.

To stay on top of cases that could affect townships, PSATS constantly checks the court dockets and keeps an eye and ear out for cases of statewide significance that are slated to go before the Commonwealth or Supreme courts. When a relevant case is appealed to a higher court, PSATS takes care to strike while the iron is hot and submit a “friend of the court” brief.

“It’s really important that townships have a voice at the table, both before the legislature and in the court system,” Michael McAuliffe Miller, an attorney with Eckert Seamans Cherin & Mellott,

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**“An amicus brief filed by PSATS adds an institutional voice to court cases sometimes lost when the litigants are an agency with a single mission or an individual.”**

# MAKE YOUR VOICE HEARD IN THE COURTS.

**Your township's annual contribution** to the Township Legal Defense Partnership helps PSATS go to bat for all townships because the outcome of one township's lawsuit could have far-reaching consequences.

**In the past year, PSATS helped townships** and filed supporting briefs in cases addressing such issues as:

- the state Ethics Act;
- the Right-to-Know Law;
- mini cell towers and public utility status; and
- municipal ordinance challenges.

**Joining is simple.** The program fee for your township is based on population. To join, simply include that fee with your annual dues payment.

**No township is immune** to the financial devastation that a lawsuit can bring. Make sure your township is a member of the PSATS Township Legal Defense Partnership!

**To request PSATS' participation,** contact PSATS Executive Director Dave Sanko or go to [www.psats.org](http://www.psats.org) and choose "Programs & Services" and then "Legal Defense Partnership."



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## PARTNERSHIP PARTICIPATION

### Recent significant court cases of interest to townships

Here's a rundown of cases in which the Partnership has filed amicus curiae briefs in the past year:

- **Firearm Owners Against Crime v. City of Harrisburg (pending before Pa. Supreme Court)** — The Pennsylvania Supreme Court will decide whether a more lenient standard adopted by the Commonwealth Court applies when determining if a party may challenge municipal ordinances.

- **Uniontown Newspapers, Inc. v. Pennsylvania Department of Corrections (pending before the Pa. Supreme Court)** — The Supreme Court will determine whether open records officers must personally review records in response to Right-to-Know Law requests or they can rely on the assessments made by employees or officials who have more familiarity with those records.

- **Chester Water Authority v. Commonwealth (pending before Pa. Supreme Court)** — The Supreme Court will decide whether the internal pre-decisional deliberation exception in the Right-to-Know Law applies when an agency shares records with its third-party contractors.

- **Carr v. Commonwealth, Dept. of Transportation (decided May 19, 2020)** — The Supreme Court held that PennDOT had properly terminated an employee for making Facebook posts on her personal time that were inconsistent with department policy.

- **Northern Berks Regional Police Commission v. Berks County Fraternal Order of Police, Lodge #71 (decided May 19, 2020)** — The Supreme Court rejected a regional police commission's argument that it would be forced to perform an illegal act if it had to reinstate an officer who was caught with pornographic pictures in his office desk and had his rights to a law enforcement database revoked. While this decision was unfavorable to municipalities, the issue was later resolved with the passage of Act 57 of 2020, which requires local police officers to be in good standing with respect to all state and federal law enforcement databases.

- **Crown Castle NG East LLC v. Pennsylvania Public Utility Commission (decided July 21, 2020)** — The Supreme Court ruled that providers of distributed antenna systems (DAS), which are often used by wireless communications providers, are entitled to public utility status. The ruling means that they are permitted to obtain certificates of public convenience from the PUC, access the right of way, be exempt from local zoning, and exercise eminent domain. The decision applies to DAS network providers, such as Crown Castle and ExteNet, but not to wireless service providers, such as AT&T, Verizon, and T-Mobile.

- **Sivick v. State Ethics Commission (decided October 1, 2020)** — The Supreme Court decided that a township supervisor did not violate the Ethics Act when he approved timesheets of his son, who was a member of the township's public works department. The court also ruled that the supervisor did not have to pay a \$30,000 restitution order since it was his son, not he, who obtained financial gain.

LLC, in Harrisburg, says. "Once a case goes by and gets decided, you may not be able to catch that wave again for a long time, and you'll be stuck with the precedent you have."

In its role as the largest municipal association in the state, PSATS is regarded as the collective voice of townships. Through the Partnership's filing of amicus briefs, the courts are provided an all-important statewide, township perspective on the issues before them.

"An amicus brief filed by PSATS adds an institutional voice to court cases sometimes lost when the litigants are an agency with a single mission or an individual," Healy, the attorney in the *Sivick* case, says.

Adam Santucci, a member of the Harrisburg law firm McNeese Wallace & Nurick LLC, agrees.

"Oftentimes, the courts and the General Assembly may only see the individuals involved in the cases and not necessarily understand the larger issues or the larger impact of a particular case," he says. "Although any one issue may not impact every township, the fact that townships speak with one voice is critical."

It's the reason that the Township Legal Defense Partnership was created in the first place, Coburn says.

"Our job is to stay focused on the big picture and represent townships on a variety of cases where a decision could ultimately impact them," he says. "That might mean involvement in cases where a township may not be specifically named in the actual lawsuit, but the outcome of the case is still likely to affect townships."

#### A vested interest

A review of the cases that PSATS has participated in over the past year reveals the far-reaching representation of the Partnership. Besides the *Sivick* case, where a township supervisor was indeed at the heart of the matter, the remain-

ing cases involve other municipalities or state agencies. In filing briefs in these cases, the Partnership acknowledged that townships have a vested interest in the court's decisions.

Consider the following questions currently before or recently decided by the Pennsylvania Supreme Court (see the box on the opposite page to learn more about the cases):

- What standard must parties meet when challenging municipal ordinances? (*Firearm Owners Against Crime v. City of Harrisburg*)
- Should open records officers be able to rely on other agency officials and employees when responding to Right-to-Know Law requests? (*Uniontown Newspapers, Inc. v. Pennsylvania Department of Corrections*)
- Should the internal predecisional deliberation exception in the Right-to-Know Law apply when an agency shares records with its third-party contractors? (*Chester Water Authority v. Commonwealth*)
- May a state employee be fired for making social media posts that harm her employer's interests and reputation? (*Carr v. Commonwealth, Dept. of Transportation*)
- Must municipal police officers be in good standing with respect to state and federal law enforcement databases? (*Northern Berks Regional Police Commission v. Berks County Fraternal Order of Police, Lodge #71*)
- Are distributed antenna system (DAS) network providers considered public utilities under the Public Utility Code or are they subject to local zoning rules? (*Crown Castle NG East LLC v. Pennsylvania Public Utility Commission*)

"The range of cases that we have been involved in this year shows that PSATS is always watching, participating, and fighting on behalf of townships," Coburn says. "Even if they don't directly affect a township, the outcome of these cases could have a dramatic impact on townships and their operations, which serves to highlight the vital role played by the Partnership."

Take the *Firearm Owners Against Crime v. City of Harrisburg* case as an example. While the lawsuit may have dealt with a city's firearm ordinances, PSATS understood that depending on



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## LEGAL DEFENSE PARTNERSHIP

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how the court ruled, it may become easier for parties to challenge any type of municipal ordinance. In its amicus brief, the Township Legal Defense Partnership argued that a more relaxed standing for challenging municipal

ordinances could end up requiring townships to potentially spend taxpayer funds defending ordinances against what are more akin to hypothetical challenges.

“An unfavorable ruling could open

the door to costly ordinance challenges and theoretical claims even if a township had not pursued enforcement and there were no aggrieved parties,” Coburn says about the case, which is currently still pending before the Supreme Court.

Oftentimes, court decisions dealing with state agencies also have a far-reaching impact on townships, which is why PSATS filed briefs this year in cases involving PennDOT and employee social media policies, the Department of Corrections and open records requests, and the Public Utility Commission and the status of mini cell tower providers.

In *Carr v. Commonwealth, Dept. of Transportation*, for example, the Supreme Court’s decision to side with PennDOT ends up being a significant win for all governmental employers that have been grappling with their employees’ ever-expanding use of social media.

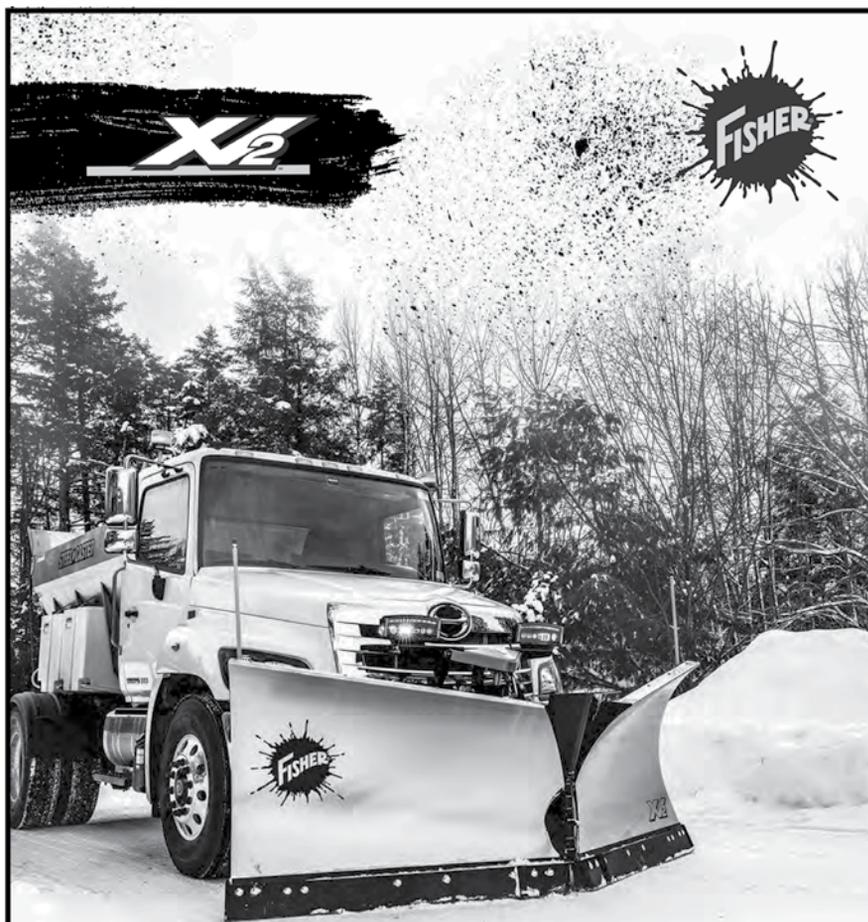
In this case, PennDOT had fired an employee for making posts to Facebook that were inconsistent with the department’s policy. The plaintiff, who identified as a PennDOT employee in her profile, had posted a self-described “rant” about school bus drivers where she said that she didn’t “give a flying \*\*\*\* about those babies” and would “gladly smash into a school bus.”

At the core of this case was whether public-sector employers can set reasonable limits to ensure their employees’ use of social media does not reflect poorly on the employer, says Miller of Eckert Seamans, who co-wrote the brief on behalf of PSATS and the other local government associations.

“It’s an important opinion because oftentimes, employers feel powerless to do anything about an employee who posts something on social media that undercuts their public mission,” he says.

At a time when society has become more electronically connected during the pandemic, the outcome of this case delivers valuable guidance to public-sector employers and employees.

“If you’re a public employer, you need to have a social media policy that is



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“The range of cases that we have been involved in this year shows that **PSATS is always watching, participating, and fighting on behalf of townships.**”

— Scott Coburn, PSATS Education Director and Counsel

clear and is communicated to employees so that everyone understands the rules of the road,” Miller says. “If you’re an employee, you must understand that your public behavior online can lead to disciplinary consequences. You cannot simply hide behind the First Amendment and say, ‘You can’t touch me.’”

### At the table

Obviously, PSATS’ participation in a case does not guarantee a victory, and in the end, the court may ultimately choose to frame the issues differently than PSATS had hoped. Yet, even if that happens, it’s important to keep in mind why PSATS must be at the table to ensure that the township voice continues to be heard.

“If you’re not in the fight to begin with, then you’re leaving that decision to someone else,” Miller says.

Take the issue of whether wireless contractors are entitled to public utility status or townships may manage the use of distributed antenna systems (DAS) in the right of way. In recent years, the

answer to this question has become increasingly important as tall poles and large antennas are installed in municipal rights of way to boost wireless broadband capacity.

“While wireless carriers like Verizon and AT&T are clearly not public utilities, the law was unclear as to whether contractors such as Crown Castle and Exe-Net are,” Daniel Cohen of the Cohen Law Group in Pittsburgh says.

The question came before the state Supreme Court this year in *Crown Castle NG East LLC v. Pennsylvania Public Utility Commission*, and PSATS joined with the other local government associations to file a brief to make sure the courts were well-versed in the municipal perspective of the issue.

“Thanks to PSATS, we were able to have ‘our day in court’ and make the case that townships need to be able to control wireless and the many other facilities that operate within the narrow ribbon of real estate known as the public rights of way,” says Cohen, who penned the brief.

In the end, the court ruled against the local government associations in deciding that DAS network providers are, indeed, public utilities and therefore not subject to local rules.

A loss in the courts does not necessarily mean the end of the story for townships affected by the decision, however. The United States, after all, was founded on a three-branch system with checks and balances in place. Over the years, some court decisions have been addressed or nullified by laws passed by the state legislature.

Such was the case following the Supreme Court’s decision this year in *Northern Berks Regional Police Commission v. Berks County Fraternal Order of Police*. The court had rejected a regional police commission’s argument that it would be forced to perform an illegal act if it had to reinstate an officer who had been fired after being caught with pornographic pictures in his office desk and subsequently had his rights to a law enforcement database revoked.

“This case was significant because it addressed the ability of townships to police the police,” says Santucci of McNees Wallace, who wrote the brief on behalf of the Partnership.

Arguing that townships should be able to properly regulate police officer conduct, PSATS’ brief emphasized the widespread problem of giving arbitrators

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# LEGAL DEFENSE PARTNERSHIP

vast discretion to override township disciplinary decisions and allow officers to be reinstated even after they have committed crimes or other heinous acts of misconduct.

“Although the Supreme Court elected not to address this key issue, it was important that townships had a voice in the process,” Santucci says. “It was critical that the Supreme Court and others understood the impact that this issue has on townships and their ability to provide effective, trusted police services.”

Following the decision, PSATS joined with other local government associations in lobbying the state legislature to resolve fundamental problems with the ruling. Less than a month later, the General Assembly enacted

Act 57 of 2020, which requires local police officers to be in good standing with respect to all state and federal law enforcement databases.

\* \* \*

The wide range of cases that the Township Legal Defense Partnership has thrown its collective weight behind this past year underscores the need to constantly remain vigilant to the many issues that come before the courts. The impact of these rulings on local government reinforces why PSATS must speak up in the courts on behalf of all townships.

Win or lose, the importance of

PSATS’ involvement in cases before the appellate courts cannot be overstated, says Tricia Springer, an attorney with Eckert Seamans Cherin & Mellott, who co-wrote PSATS’ brief in the *Carr* decision.

“Having clerked for the Supreme Court, I can say that having a reputable organization like PSATS file an amicus brief makes a difference,” she says.

The Association’s participation serves to alert the justices that a case may be bigger and affect more interests than just the parties named in it.

“The court takes PSATS’ involvement seriously, and it gives it pause to consider more deeply the broader ramifications of its decision,” Springer says. ♦

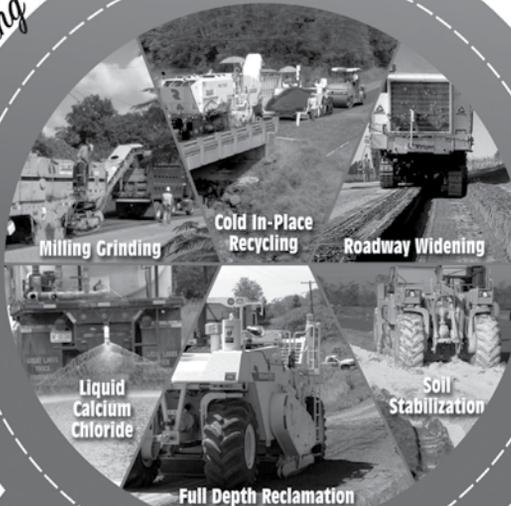
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