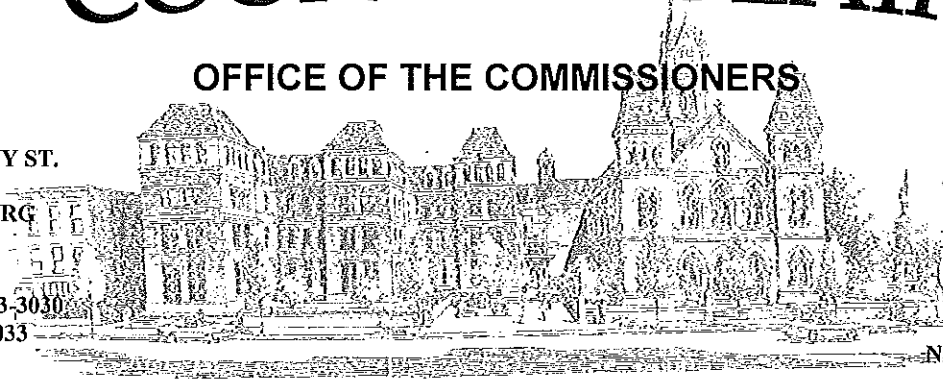


COUNTY of BLAIR

OFFICE OF THE COMMISSIONERS

423 ALLEGHENY ST.
SUITE 441-A
HOLLIDAYSBURG
PA 16648-2022

PHONE (814) 693-3030
FAX (814) 693-3033



BRUCE R. ERB
President
TERRY TOMASSETTI
Vice President
TED BEAM, JR.
Secretary
HELEN P. SCHMITT
County Administrator
NATHAN W. KARN, SR.
Solicitor

COURTHOUSE & COUNTY GOVERNMENT OFFICES

May 2, 2019

Christopher W. Irvin
210 4th Ave.
Altoona, PA 16602
F16vipers@yahoo.com
*Sent via e-mail only

In re: Right to Know Request of April 30, 2019

Dear Mr. Irvin:

On March 30, 2019, I received your Right to Know request dated March 30, 2019 which requested the following:

“Copies of any and all documents pertaining to an appeal, filed by Amy Webster, on October 11th 2017, that was filed to have her law offices and home at 1111 N. Juniata St, Hollidaysburg, PA declared tax exempt as a church.”

Your request is granted. Please see the files attached to this e-mail correspondence.

Please be advised that this correspondence will serve to close this record with our office as permitted by law.

Very truly yours,

Nicole M. Hemminger
Right-To-Know Officer
County of Blair
423 Allegheny Street
Hollidaysburg, PA 16648



pennsylvania

OFFICE OF OPEN RECORDS

Sent to
DeAnna,
Nathan.
4/30/19
5/7/19

STANDARD RIGHT-TO-KNOW REQUEST FORM

DATE REQUESTED: 04-30-2019

REQUEST SUBMITTED BY: E-MAIL U.S. MAIL FAX IN-PERSON

REQUEST SUBMITTED TO (Agency name & address): Nicole M. Hemminger Assistant County Administrator

Blair County Courthouse 423 Allegheny Street, Suite 441A Hollidaysburg, PA 16648

NAME OF REQUESTER: Christopher W. Irvin

STREET ADDRESS: 210 4th Ave

CITY/STATE/COUNTY/ZIP(Required): Altoona, Pennsylvania/Blair County/16602

TELEPHONE (Optional): _____ EMAIL (optional): fl6vipers@yahoo.com

RECORDS REQUESTED: **Provide as much specific detail as possible so the agency can identify the information. Please use additional sheets if necessary*

I am requesting copies of any and all documents pertaining to an appeal, filed by Amy Webster, on October 11th 2017, that was filed to have her law offices and home at 1111N Juniata St, Hollidaysburg, PA declared tax exempt as a church.

DO YOU WANT COPIES? YES NO

DO YOU WANT TO INSPECT THE RECORDS? YES NO

DO YOU WANT CERTIFIED COPIES OF RECORDS? YES NO

DO YOU WANT TO BE NOTIFIED IN ADVANCE IF THE COST EXCEEDS \$100? YES NO

**** PLEASE NOTE: RETAIN A COPY OF THIS REQUEST FOR YOUR FILES ****
**** IT IS A REQUIRED DOCUMENT IF YOU WOULD NEED TO FILE AN APPEAL ****

FOR AGENCY USE ONLY

OPEN-RECORDS OFFICER:

I have provided notice to appropriate third parties and given them an opportunity to object to this request

DATE RECEIVED BY THE AGENCY:

AGENCY FIVE (5) BUSINESS DAY RESPONSE DUE:

***Public bodies may fill anonymous verbal or written requests. If the requestor wishes to pursue the relief and remedies provided for in this Act, the request must be in writing. (Section 702.) Written requests need not include an explanation why information is sought or the intended use of the information unless otherwise required by law. (Section 703.)*

BLAIR COUNTY ^{Down}
BOARD OF ASSESSMENT APPEALS

423 Allegheny St, Suite 041, Hollidaysburg, PA 16648
814-693-3110

RECEIVED
JUL 31 2017
ASSESSMENT

APPLICATION FOR THE EXEMPTION FROM REAL PROPERTY TAXATION

Application must be filed with the Assessment Office on or before **August 1st**.
If granted, the exemption will affect the next calendar year. All taxes for current and previous years must be paid.

Parcel Number: 11.07-10.-00300-000 Control Number: 0006223

Situs/Location of Property: 1111 North Juniata St. Hollidaysburg PA 16648

Recorded Owner(s) Name: Amy E Webster

Mailing Address: same 1111 North Juniata St. Hollidaysburg, PA 16648

What is the current use and/or planned use of the property for which exemption is being sought:
church / place of worship

10-11-17
1:30
103

Is there any income generated by this property? No Yes If yes please describe:

What category of exemption under the Consolidated County Assessment Law (53 Pa. C.S.A. §8812) are you applying for:
Place of worship

If the organization is seeking exemption as an institute of purely public charity, you must meet **both** tests laid out in the case of Hospital Utilization Project v. Commonwealth, 487 A.2d 1306 (hereinafter "HUP Test"), and the Institutions of Purely Public Charities Act (hereinafter "Act 55 Test");

- Advances a charitable purpose;
 - Donates or renders gratuitously a substantial portion of its services;
 - Benefits a substantial and indefinite class of persons who are legitimate subjects of charity;
 - Relieves the government of some of its burden; and
 - Operates entirely free from private profit motive.
- n/a

Please attach a list of each of the five prongs under both the HUP Test and Act 55 Test and how your organization meets each of the five prongs (total of ten prongs) including any documentary exhibits supporting your assertions. The organization must provide proof of how it meets each prong of each test under the HUP Test and Act 55 Test; bald assertions simply indicating the organization meets a particular prong will not allow the Board to favorably consider the organization's application.

I/We hereby attest that the above information is true and correct to the best of my knowledge. I/We understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to unsworn falsification to authorities.

Amy E Webster 7/31/2017 2017
 Authorized Representative Signature Date
Amy E. Webster (814) 807-8007
 Print Name Daytime Phone Number

All notices of these proceedings shall be mailed to the owner(s) of record above and such other as identified below.

Name: _____
 Mailing Address: _____
 Daytime Phone Number: _____

See the Blair County Assessment Appeals Rules and Regulations for additional information **REQUIRED** to be submitted with application.

FAITHFULNESS MINISTRIES, INC.

1111 North Juniata Street, Hollidaysburg, PA 16648

Statement of Belief:

God is faithful...

"If God is for us, who can stand against us?...In all these things we are more than conquerors through Him who loved us. For I am convinced that neither death nor life, neither angels nor demons, neither the present nor the future, nor any powers, neither height nor depth, nor anything else in all creation, will be able to separate us from the love of God, that is in Christ Jesus, our Lord." Romans 8:37-39

The triune God is the only God; the God of the universe...

"'But what about you?' he asked. 'Who do you say that I am?'"

Simon Peter answered,

'You are the Christ, the Son of the Living God.'

'This was not revealed to you by man, but by my Father in heaven ... on this rock I will build my church and the gates of Hell will not overcome it...'" Matthew 16:15-19

The following shall be the Mission Statement and By-Laws of

FAITHFULNESS MINISTRIES, INC.,

a domestic non-profit corporation formed under the laws of the Commonwealth of Pennsylvania.

Section I - Mission Statement

Our mission is to proclaim the Word of God and the Gospel of Jesus Christ, our only Lord and Savior, who commanded us as follows: "...Jesus came to them and said, 'All authority in heaven and on earth has been given to me. Therefore go and make disciples of all nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit, and teaching them to obey everything I have commanded you. And surely I am with you always, to the very end of the age.'" Matthew 28:18-20

Those persons who identify as members or attendees of this church body have assembled in order to establish and maintain a place to worship Almighty God, our Heavenly Father, to proclaim His only

begotten Son, Jesus Christ, and to provide an atmosphere of prayer and surrender where the Holy Spirit of God may enlighten, guide, and sanctify us.

Section II - Statement of Faith

Members of Faithfulness Ministries understand and accept that the Holy Scriptures are the revealed will of God (II Tim 3:16,17), inspired by the Holy Spirit (II Peter 1:21), the directives for faith and practice; and for the purpose of maintaining general unity, adopts the following as statements of fundamental truths:

God is the creator and sustainer of the universe: infinite, eternal, and unchangeable in His being, wisdom, power, holiness, justice, goodness, and truth, and is sovereign in all things.

There is but one God, the living and true God, who is the triune God: God the Father, God the Son, and God the Holy Spirit; these three are one, the same in substance, and equal in power and glory, existing eternally.

Everything that is, ever was, or shall be, was created by God when He spoke and directed Creation over a period of six days.

God created man, male and female, in His own image, and gave them dominion over the creatures.

When God created the man, Adam, as the representative of all persons who will ever be, He entered into a covenant of life with him, requiring perfect obedience, forbidding him to eat from the tree of knowledge of good and evil, upon pain of death.

God created for Adam a companion and helper, the woman, Eve, out of the very substance of Adam, as an extension and a part of him, who are our first parents, and God gave them a free will.

However, in the exercise of their free will, Eve was tempted by Satan to eat the fruit of the tree, which she shared with her husband, and both ate the fruit, desiring to be like God, and transgressing against God's decree.

At that time, sin entered the world, corrupting and poisoning all aspects of creation.

Mankind therefore, fell into a state of sin, misery, and eternal death.

God had decreed certain laws which His people are required to honor and follow.

However, none of God's people are righteous, and all sin and constantly defy those commands of God, and therefore, those persons and the actions that they choose to take in defiance of God deserve punishment by God's wrath.

But God, having since before time, knowing that all these things would transpire, had prepared His plan to redeem those whom He had chosen.

Jesus is the only begotten Son of God, the redeemer of God's elect, and who executes the offices of prophet, priest, and king, by way of His humiliation and exultation.

The humiliation of Jesus was that He came to the earth to be born of a virgin, was made in the likeness of man, lived a perfect and sinless life on earth, was perfectly obedient to God, the Father, suffered the miseries of life, the wrath of God, and the cursed death of the cross.

The exultation of Jesus was that He rose from the dead on the third day, ascended to heaven, sits now and forever at the right hand of God the Father, and that He shall judge the world on the last day.

No one comes to the Father but by Jesus, the Son, who is the Way, the Truth and the Life, and we are partakers in His righteousness by His redemption of the elect.

The Holy Spirit is the Spirit of the One True God, who applies to us the redemption purchased by the work of Jesus, the Christ, and dwells in us and guides us in our sanctification.

Therefore, in God's own perfect plan of redemption, God bestows His grace upon those whom He has chosen and given faith.

The Holy Spirit renews those who by such faith have been justified and adopted by God, thereby guiding the elect in their sanctification.

God mercifully and graciously grants faith not because mankind is worthy, but rather, because Jesus, the Son, the only redeemer of God's elect, gave His earthly life to redeem those sinners, and to deliver them from sin and eternal death.

Jesus had demonstrated His perfect obedience in His sinless life and in His ministry, where Jesus taught, loved, and healed those persons with whom He came in contact, demonstrating His holy nature in performing miracles and fulfilling all the Messianic prophecies.

Jesus then suffered and died the most horrific and cruel death, whereupon He also suffered the wrath of God and was cursed for the sins of His people, was buried and sealed in a tomb, but nonetheless, arose from the grave, having defeated the bonds of death, having fulfilled all the prophecies.

Jesus directed that His people are to love God with all our heart, soul, mind and strength, and our neighbor as ourselves.

Jesus also directed that we are required to go into the world and preach the gospel to every creature.

The chief end of mankind is to glorify God and to enjoy Him forever!

Section III – By-Laws

ARTICLE I ORGANIZATION

1. The name of the organization shall be "Faithfulness Ministries, Inc."
2. The form of organization shall be a non-profit corporation, organized and existing under the laws of the Commonwealth of Pennsylvania.
3. The corporation shall exist in perpetuity effective as of December 1, 2014.
4. The corporation may apply for Section 501 (c)(3) status, but is not required so to do.

ARTICLE II PURPOSES

1. The main purpose and focus of this organization is to establish and maintain a place to worship Almighty God, our Heavenly Father, to proclaim His only begotten Son, Jesus Christ, and to provide an atmosphere of prayer and surrender where the Holy Spirit of God may enlighten, guide, and sanctify us.
2. As a necessary result of the purpose of this organization, the members are encouraged to carry out the directive of the "Great Commission", as stated by Jesus in Matthew 28:18-20, specifically, to "...go and make disciples of all nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit, and teaching them to obey everything I have commanded you. And surely I am with you always, to the very end of the age." Matthew 28:18-20
3. As a further necessary result of the purpose of this organization, the members are encouraged to practice compassion towards all God's people and creatures.
4. No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to, its members, trustees, officers, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered, to pay for the costs and maintenance of the church building, offices, meeting rooms, kitchen, parsonage, and headquarters (currently 1111 North Juniata Street, Hollidaysburg, PA), and to make payments and distributions in furtherance of the purposes set forth in Article II #1 hereinabove.
5. This corporation has not been formed for the creation of any profit or personal financial gain for any of the officers, members, elders, deacons, chaplains, leaders, speakers, or any other persons associated with the corporation. This corporation is organized exclusively for charitable and religious purposes.

6. The use of the ministry facility, currently at 1111 North Juniata Street, Hollidaysburg, PA, shall be restricted to the religious purposes of the organization, as described in Article II #1 hereinabove.

7. No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of or in opposition to any candidate for public office. Notwithstanding any other provision of these articles, the corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code or (b) by a corporation, contributions to which are deductible under section 170(c)(2) of the Internal Revenue Code, or the corresponding section of any future federal tax code.

ARTICLE III MEMBERSHIP

Membership in this organization shall be extended to all applicants who give evidence of their faith in the one true God, his son, Jesus Christ, our Lord, and the Holy Spirit, and who:

Fully subscribe to the Mission Statement and Statement of Faith.

Have a willingness to actively support and participate in the activities and programs of this church organization, and to use their gifts and talents given by God for the furtherance of the mission of this church organization.

Will commit to be involved in some form of responsibility using those gifts in the functioning of the church programs and activities.

Are willing to contribute regularly to the support of the church.

Will commit to praise and prayer concerning all facets of the church.

ARTICLE IV MEETINGS and VOTING

1. Meetings for public worship shall be held regularly, and include the weekly Bible studies, activities, Saturday worship, Christian film viewing, dinners, and other activities that may be planned or added in the future.

2. The general membership shall have the opportunity to meet at least once annually, to review the progress of the church body in meeting the goals and mission of the organization. Such meeting will occur in January of each calendar year. The budget for the upcoming year shall be presented by the church leaders for acceptance by the members. All officers and leaders shall have the opportunity to present their reports for the prior year at this meeting. The exact date and time of this meeting shall be determined by the leadership and notice given via phone and/or electronic media to all members, at least seven (7) days in advance.

3. The leaders shall meet regularly, but at least once a quarter on a date determined by the leaders, and notice of the time and date of each such meeting given via phone and/or electronic media to all members, at least seven (7) days in advance. A majority of the leaders, must be present to constitute a quorum. No business of the church shall be transacted or voted upon unless a quorum of the leaders is present.

4. A quorum shall consist of not less than fifty (50%) of the members of the general membership of the church, for all general membership meetings, and shall be necessary to conduct the business of this organization. In the event that less than fifty (50%) percent of the voting members appear for any meeting, said meeting may adjourn and business may be conducted. However, the effective date of the acceptance of said business shall be seven (7) days after the posting of the minutes of said meeting on the organization website, in order that the membership of the organization shall be informed of the business and decisions determined at the meeting.

5. Special meetings may be called by the leaders when they deem it necessary or in the best interest of the organization. Notice of special meetings shall state the reasons that such meeting has been called and the business to be transacted at such meeting. No other business but that specified in the notice may be transacted at such special meeting without the consent of a minimum of fifty (50%) percent of the voting members present at such meeting.

6. The organization may proceed with all actions which have been approved by a vote of a minimum of fifty (50%) percent of the membership of the organization at any general membership meeting, business meeting, or special meeting.

ARTICLE V PREROGATIVES

1. This church shall have the right to govern itself according to the laws, commands, and standards set forth in the Holy Bible, and shall follow and comply with the directives of the one true and eternal God.

2. In furtherance of its mission and governance, church may implement any of the following:

- a) To establish and maintain such departments, institutions, and services within the church of the propagation of the Gospel and its work embraced by the purpose of this Corporation.
- b) To examine candidates ministry and missions and to endorse and support missionary programs according to the standards set forth by the New Testament.
- c) To establish or to participate in and with other churches, church schools, missions, and activities according to standards set forth by the New Testament.
- d) To designate its own officers, to appoint committees, to arrange for its own meetings, and to govern itself in accordance by this constitution.
- e) To conduct weddings, baptisms, and funerals in the discretion of the ministers and comporting and complying with the laws and commands of God and avoiding the prohibitions set forth by God in His laws and commands set forth in His Holy Bible.
- f) To establish and define policy by which it shall be governed.

3. While maintaining its inherent rights to sovereignty in the conduct of its own affairs, this church shall voluntarily enter into spiritual fellowship with all churches of like reformed faith.

ARTICLE VI ORDINANCES

1. Baptism with water may be administered to all those who believe in the Lord Jesus Christ and who give clear evidence of their salvation.

2. The Lord's Supper shall be observed as commanded by the scriptures.

3. God established and ordained marriage as the union of one man and one woman. Any wedding conducted by the ministers or involving or occurring at the property where any church activities occur shall be considered a Christian worship service, and shall comport to the directives of God.

ARTICLE VII OFFICES

1. General Offices

The General Offices of the church shall be the positions of Minister(s), Elders and Deacons. The Spiritual and Temporal government of this church shall be vested in the Minister(s) and Elders. The Elders will be appointed by the Minister(s) and the Deacons shall be appointed by the Minister(s) and

Elders. No members will be appointed in any offices without prayer and in accordance with the direction given by the Holy Spirit.

2. Other Offices

Other offices in the church shall be appointed by the Elders with the approval of the Minister(s). Other offices include Treasurer, Secretary, teachers, and others to be determined as the need arises within the calling and purposes of the church organization.

3. Internal Organizations

This church may establish groups within as the needs may require. All such groups shall be subordinate to the church and shall contribute to the harmony and development of the whole. They shall be under the general supervision of the Minister(s) and Elders and specific supervision of the Deacons.

4. Eligibility

Any officer of the church may hold more than one office at a time.

5. Direction of the Organization

The Minister(s), Elders, and Deacons shall serve as the directors of the organization. This group shall work together with its purposes to be the support and continuation of the goals and purposes of the organization, as set forth hereinabove. If possible, this group shall consist of an odd number of persons, to avoid the gridlock of a tie vote on any subject. This group will represent the organization, and may suggest amendments, additions, changes, or revocation of provisions of these bylaws.

6. Removal from Office

Members may be removed from any offices in accordance with either of the following procedures, which are not mutually exclusive:

A. Any member in office that chooses to terminate his or her duties and position should contact the Minister(s). Such member and the Minister(s) shall consult and determine the proper course of action.

B. The Minister(s) and the Elders may remove any member from office in the event of the member's failure to continue in their walk with God, unscriptural conduct, doctrinal departure from the Statement of Faith or by creating or promoting a division in the church. Removal by the Minister(s) and Elders must be as a result of prayer and a follow up to prior conversations with that member(s). Removal from office may coincide with cancellation of membership.

C. Minister(s) may be removed from office for blatant unscriptural conduct, teaching blasphemous doctrine contrary to the Scriptures, or incompetency in office. Notice must be given in writing of the offensive behavior, and the Minister must be afforded an opportunity to correct said behavior within thirty (30) days of the date of delivery of the written notice.

7. Salaries

The Minister(s), Elders, and Deacons shall fix the compensation of any and all employees which they in their discretion may determine to be necessary for the conduct of the business of the organization. Currently, all persons working within this organization shall serve without compensation.

ARTICLE VIII SPIRITUAL REQUIREMENTS

All offices, business, services, and activities of this church organization shall be conducted in accordance with the laws, commands, and directives of God, as revealed to mankind in His Holy Bible.

ARTICLE IX ORDER of BUSINESS for MEETINGS

1. Opening Prayer.

2. Roll Call.
3. Reading and approval of the Minutes of the preceding meeting.
4. Reports of Committees.
5. Reports of Officers.
6. Old and Unfinished Business.
7. New Business.
8. Adjournment and closing Prayers.

ARTICLE X FINANCIAL ISSUES

This church organization may accept tithes and offerings from the members and any other individuals, groups, and/or organizations in order to fulfill its financial obligations, for the effective operation of the organization and its activities, and of its stated purpose to assist those in need in the community and elsewhere.

ARTICLE XI CONFLICT OF INTEREST POLICY

The corporation has adopted a conflict of interest policy regarding procedures to follow in the event that a person in a position of authority of this corporation might benefit personally from a decision for which he or she may be asked to vote or otherwise participate in decision-making.

ARTICLE XII AMENDMENTS

These By-Laws may be altered, amended, repealed or added to by an affirmative vote of not less than seventy-five (75%) percent of the voting members.

AND NOW, this 1st day of December, 2014, the persons who have formed this, Faithfulness Ministries, Inc., have hereby accepted and enacted the Statements and Bylaws contained herein.

Amy Webster Hill
Juday E. Hill

David E. Hill

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS
401 NORTH STREET, ROOM 206
P.O. BOX 8722
HARRISBURG, PA 17105-8722
WWW.CORPORATIONS.STATE.PA.US/CORP

Faithfulness Ministries, Inc.

THE BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS IS HAPPY TO SEND YOU YOUR FILED DOCUMENT. THE BUREAU IS HERE TO SERVE YOU AND WANTS TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE BUREAU, PLEASE VISIT OUR WEB SITE LOCATED AT WWW.CORPORATIONS.STATE.PA.US/CORP OR PLEASE CALL OUR MAIN INFORMATION TELEPHONE NUMBER (717)787-1057. FOR ADDITIONAL INFORMATION REGARDING BUSINESS AND / OR UCC FILINGS, PLEASE VISIT OUR ONLINE "SEARCHABLE DATABASE" LOCATED ON OUR WEB SITE.

ENTITY NUMBER: 4313181

SILL & WEBSTER, ATTORNEYS AT LAW, P.C.
314 WAYNE ST
HOLLIDAYSBURG, PA 16648-0

**PENNSYLVANIA DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS**

Articles of Incorporation-Nonprofit

(15 Pa.C.S.)

- Domestic Nonprofit Corporation (§ 5306)
 Nonprofit Cooperative Corporation (§ 7102B)

Name		
Sill & Webster, Attorneys		
Address		
314 Wayne Street		
City	State	Zip Code
Hollidaysburg, PA		16648

Commonwealth of Pennsylvania
ARTICLES OF INCORPORATION-NON-PROFIT 3 Page(s)



Fee: \$125

In compliance with the requirements of the applicable provisions (relating to articles of incorporation or cooperative corporations generally), the undersigned, desiring to incorporate a nonprofit/nonprofit cooperation corporation, hereby state(s) that:

1. The name of the corporation is:
Faithfulness Ministries, Inc.

2. The (a) address of this corporation's current registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and Street	City	State	Zip	County
1111 North Juniata Street	Hollidaysburg, PA	16648	Blair	

(b) Name of Commercial Registered Office Provider
c/o: _____ County _____

3. The corporation is incorporated under the Nonprofit Corporation Law of 1988 for the following purpose or purposes.
To proclaim the Gospel of Jesus Christ; to offer religious teaching and services;
to create and assist in outreach programs in the local, national, and world community

4. The corporation does not contemplate pecuniary gain or profit, incidental or otherwise.

PA DEPT. OF STATE PA DEPT. OF STATE

NOV 17 2014

DEC 01 2014

5. Check one of the following:

The corporation is organized on a non-stock basis.

Option for Nonprofit Cooperative Corporation Only: The corporation is organized on a stock share basis.

6. For Nonprofit Corporation Only:

~~(Strike out if inapplicable):~~ The corporation shall have no members.

~~(Strike out if inapplicable):~~ The incorporators constitute a majority of the members of the committee authorized to incorporate: _____ by _____ the requisite vote required by the organic law of the association for the amendment of such organic law.

7. For Nonprofit Cooperative Corporation Only:

Complete and strike out the inapplicable term: The corporation is a cooperative corporation and the common bond of membership among its (members) (shareholders) is: _____

8. The name(s) and address(es) of each incorporator(s) is (are) (all incorporators must sign below):

Name(s) Address(es)
Amy Webster Sill, 1111 North Juniata Street, Hollidaysburg, PA 16648

9. The specified effective date, if any, is:

May 1 2014
month day year hour, if any

10. Additional provisions of the articles, if any, attach an 8 1/2 x 11 sheet.

IN TESTIMONY WHEREOF, the incorporator(s) has/have signed these Articles of Incorporation this

10th day of November,
2014

Amy Webster Sill
Signature

Signature

Signature

#102212

CERTIFICATE OF ORDINATION

this certifies that

Amy Webster Sill

has completed all the requirements for Ordination
as a minister of the Gospel of Jesus Christ and is hereby
commissioned to teach the Word, preach the Gospel, and
to administer all the sacraments, ordinances and other
functions of the church,

And is hereby awarded this certificate
by

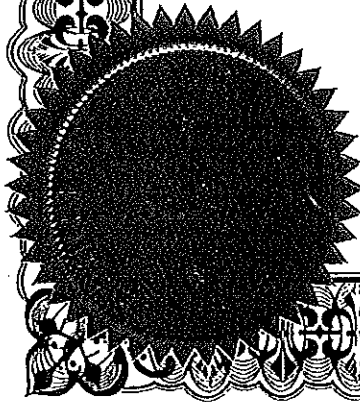
**Ministers for Christ
Assembly of Churches
6630 West Cactus Road, #B107-767
Glendale, Arizona 85304 USA**

Twenty—Seventh day of February 2013

[Signature]

[Signature]

Lifetime Member



Fellowship Member: 102212 : Lifetime

**MINISTERS FOR CHRIST
ASSEMBLY OF CHURCHES
Amy Webster**

This is to Certify that
In Affiliated as a MINISTERIAL MEMBER in good standing of Ministers for
Christ Assembly of Churches, is recognized as being: **Ordained**

as a Minister of the Full Gospel of Jesus Christ, and hereby accorded to all the
rights and privileges included herein.

Ministers for Christ
Assembly of Churches
6630 W. Cactus Rd.
#B107-767
Glendale, AZ 85304

[Signature]
Executive Secretary

**Blair County Board of Assessment Appeals
Assessment Appeal Form**

Official Use Only	Received:	<div style="border: 1px solid black; padding: 5px; text-align: center;"> RECEIVED JUL 31 2017 ASSESSMENT </div>
	<input type="checkbox"/> C <input type="checkbox"/> R	

This required appeal form provides written notification of your intent to appeal. Pursuant to "Blair County Assessment Appeals Rules and Regulations," an appellant must complete and timely submit this form for each parcel appealed. Any persons, including the affected taxing districts, aggrieved by an assessment must file on or before **August 1st** for annual appeals or within 40 days from a new or revised assessment. This form must be received or postmarked (send to Blair County Assessment Office, 423 Allegheny St, Suite 041, Hollidaysburg, PA 16648) by the filing deadline. Untimely filed appeals will be rejected and a hearing will not be scheduled.

Parcel #: 11.07-10.-003.00-000 Control #: 00016223
 Recorded Owner(s) Name: Amy E. Webster et al.
 Mailing Address: 1111 North Juniata St.
Hollidaysburg, PA 16648
 Location of Property Subject to Appeal: 1111 North Juniata St.
Hollidaysburg PA
 Municipality (Borough or Township): Hollidaysburg Acres: .72
 Property Type: Residential/Agricultural/Vacant Land Commercial/Industrial

Assessment Appealed: \$ 350,000.00 Appellant's Opinion of Market Value: \$ 250,000.00

State your reason(s) for filing this appeal:
53 Pa. C.S. A 38842 et seq value
53 Pa. C.S. A 38812 et seq exemption

An appellant shall bring four (4) copies of any documentation/evidence that will be presented to the Board at the time of hearing. The Board, at its discretion, may retain any such documents, which may not be returned. Appellants of rental/commercial/industrial parcels must be prepared to submit evidence related to (1) leases and (2) income and expense statements for the past three years. Review the "Blair County Assessment Appeals Rules and Regulations" prior to your hearing.

You will receive a written notification, which will be postmarked no less than 20 days in advance of your scheduled appeal. Hearings will not be rescheduled. If you are unable to attend your scheduled hearing for any reason, you may send an authorized representative to the hearing on your behalf. An "Affidavit to Appoint a Personal Representative" must be completed and presented at the time of your hearing. This form is available at www.blairco.org, and the Assessment Office. If you do not appear on the scheduled date and time, your appeal will be considered abandoned.

I/we hereby declare my/our intention to appeal the assessed valuation of the property described above and do hereby verify that the statements made in this appeal are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. section 4904, relating to unsworn falsification to authorities. I understand that by appealing, the record is re-evaluated and the resulting assessment may be higher, lower, or unchanged.

Appellant Name: Amy E. Webster Date: 7/27/2017
 Appellant Signature: [Signature] Daytime Phone #: (814) 807-8007

All notices of these proceedings shall be mailed to the following recipient and address:
 (only complete if recipient or address is in addition to or different than the owner and mailing address above)

AMY E. WEBSTER, ATTORNEY
Lasting Law & Land, Inc.
 1111 North Juniata Street
 Hollidaysburg, PA 16648

BLAIR COUNTY
 COUNTY BOARD OF ASSESSMENT APPEALS
 OFFICIAL BOARD RECORD OF APPEAL HEARING

LOCATION: Courthouse-Room 2B DATE: 10/11/2017 TIME: 1:30 PM

PROPERTY OWNER: WEBSTER AMY E & GREEN LINDSAY E SITUS: 1111 N JUNIATA ST

2ND CONTACT : _____

PARCEL NUMBER : 11.07-10.-003.00-000 ACRES: .72 PROPERTY TYPE: R

FAIR ASSESSED VALUE	CLEAN AND GREEN ASSESSED VALUE
Last Mailed: 350,000	Last Mailed:
Proposed: 350,000	Proposed:

PROPERTY OWNER'S EVIDENCE OF MARKET VALUE:

DECISION ORDER NOTES:

no evidence presented

Request for exemption denied
Request for value denied

<input type="checkbox"/>	No Show
<input type="checkbox"/>	Withdrawn
<input checked="" type="checkbox"/>	Denied
<input type="checkbox"/>	Revised
<input type="checkbox"/>	Delayed

L	- 35,000
B	- 315,000
T	- 350,000

	<u>10-11-2017</u>
	(Decision Date)

378
 (Board Member)

150
 (Board Member)

650
 (Board Member)

650
 (Secretary)

637
 (Appraiser)



00016223

Supreme Court of Pennsylvania

Court of Common Pleas Civil Cover Sheet



Blair County

For Prothonotary Use Only:	
Docket No:	2017 GN 3190

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

Commencement of Action:

Complaint Writ of Summons Petition Notice of Appeal

Transfer from Another Jurisdiction Declaration of Taking

Lead Plaintiff's Name: Amy E. Webster Lead Defendant's Name: BLAIR COUNTY BOARD OF ASSESSMENTS

Check here if you are a Self-Represented (Pro Se) Litigant

Name of Plaintiff/Appellant's Attorney: Amy E. Webster, Esq.

Are money damages requested? : Yes No Dollar Amount Requested: X within arbitration limits
(Check one) _____ outside arbitration limits

Is this a *Class Action Suit*? Yes No

SECTION B

Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your *PRIMARY CASE*. If you are making more than one type of claim, check the one that you consider most important.

<p>TORT (do not include Mass Tort)</p> <p><input type="checkbox"/> Intentional</p> <p><input type="checkbox"/> Malicious Prosecution</p> <p><input type="checkbox"/> Motor Vehicle</p> <p><input type="checkbox"/> Nuisance</p> <p><input type="checkbox"/> Premises Liability</p> <p><input type="checkbox"/> Product Liability (does not include mass tort)</p> <p><input type="checkbox"/> Slander/Libel/Defamation</p> <p><input type="checkbox"/> Other:</p> <p>_____</p>	<p>CONTRACT (do not include Judgments)</p> <p><input type="checkbox"/> Buyer Plaintiff</p> <p><input type="checkbox"/> Debt Collection: Credit Card</p> <p><input type="checkbox"/> Debt Collection: Other</p> <p>_____</p> <p><input type="checkbox"/> Employment Dispute: Discrimination</p> <p><input type="checkbox"/> Employment Dispute: Other</p> <p>_____</p> <p><input type="checkbox"/> Other:</p> <p>_____</p>	<p>CIVIL APPEALS</p> <p>Administrative Agencies</p> <p><input checked="" type="checkbox"/> Board of Assessment</p> <p><input type="checkbox"/> Board of Elections</p> <p><input type="checkbox"/> Dept. of Transportation</p> <p><input type="checkbox"/> Zoning Board</p> <p><input type="checkbox"/> Statutory Appeal: Other</p> <p>_____</p> <p>Judicial Appeals</p> <p><input type="checkbox"/> MDJ - Landlord/Tenant</p> <p><input type="checkbox"/> MDJ - Money Judgment</p> <p><input type="checkbox"/> Other:</p> <p>_____</p>
<p>MASS TORT</p> <p><input type="checkbox"/> Asbestos</p> <p><input type="checkbox"/> Tobacco</p> <p><input type="checkbox"/> Toxic Tort - DES</p> <p><input type="checkbox"/> Toxic Tort - Implant</p> <p><input type="checkbox"/> Toxic Waste</p> <p><input type="checkbox"/> Other:</p> <p>_____</p>	<p>REAL PROPERTY</p> <p><input type="checkbox"/> Ejectment</p> <p><input type="checkbox"/> Eminent Domain/Condemnation</p> <p><input type="checkbox"/> Ground Rent</p> <p><input type="checkbox"/> Landlord/Tenant Dispute</p> <p><input type="checkbox"/> Mortgage Foreclosure</p> <p><input type="checkbox"/> Partition</p> <p><input type="checkbox"/> Quiet Title</p> <p><input type="checkbox"/> Other:</p> <p>_____</p>	<p>MISCELLANEOUS</p> <p><input type="checkbox"/> Common Law/Statutory Arbitration</p> <p><input type="checkbox"/> Declaratory Judgment</p> <p><input type="checkbox"/> Mandamus</p> <p><input type="checkbox"/> Non-Domestic Relations Restraining Order</p> <p><input type="checkbox"/> Quo Warranto</p> <p><input type="checkbox"/> Replevin</p> <p><input type="checkbox"/> Other:</p> <p>_____</p>
<p>PROFESSIONAL LIABILITY</p> <p><input type="checkbox"/> Dental</p> <p><input type="checkbox"/> Legal</p> <p><input type="checkbox"/> Medical</p> <p><input type="checkbox"/> Other Professional:</p> <p>_____</p>		

AMY E. WEBSTER, DAVID E. SILL,	:	IN THE COURT OF COMMON PLEAS
And LINDSAY E. GREEN,	:	BLAIR COUNTY, PENNSYLVANIA
Appellant	:	
vs.	:	CIVIL ACTION--LAW
	:	
BLAIR COUNTY BOARD OF	:	NO.
ASSESSMENT APPEALS,	:	
Appellee	:	

ASSESSMENT APPEAL MEDIATION SCHEDULING ORDER

AND NOW, this _____ day of _____, 201____, it is hereby ORDERED AND DECREED as follows:

1. This case has been assigned to _____ for mediation purposes.
2. All those with full settlement authority shall be personally present for the mediation session.
3. A mediation of the Appeal from the Decision of the Board of Assessment shall be held on the ____ day of _____, 201____, at _____ am/pm, at _____, Blair County Courthouse, Hollidaysburg, PA.
4. Three copies of any evidence to be used in a hearing must be brought to the mediation including an appraisal of the subject property if available.

BY THE COURT:

Judge

AMY E. WEBSTER, DAVID E. SILL,
And LINDSAY E. GREEN,
Appellant
vs.

BLAIR COUNTY BOARD OF
ASSESSMENT APPEALS,
Appellee

IN THE COURT OF COMMON PLEAS
BLAIR COUNTY, PENNSYLVANIA

CIVIL ACTION--LAW

NO. 2017 GN 3190

PETITION FOR APPEAL FROM DECISION OF BOARD OF ASSESSMENT APPEALS

I/we, the Appellant identified above, did participate in a formal appeal before the Board of Assessment Appeals. I have attached the decision by the "Board" dated October 27, 2017.

1. This Petition is filed by the Appellant: Amy E. Webster, David E. Sill, and Lindsay E. Green.

2. The subject real estate and/or taxable property is:

A. In the nature of:

Commercial/ Residential/ Agricultural/ Other

B. Owned by Appellant: Amy E. Webster, David E. Sill, and Lindsay E. Green

C: Address: 1111 North Juniata Street, Hollidaysburg, PA 16648

D. Parcel identifier: 11.07-10..-003.00-000

3. The taxing bodies interested in the taxable status of the subject property are:

A. County of Blair

B. Municipality: Hollidaysburg Borough

C. School district: Hollidaysburg Area S.D.

4. The Blair County Assessment Office made an assessment of the property; the Appellants appealed the assessment to the Board of Assessment Appeals (the "Board") on two (2) bases:

a. Requesting that the assessment be reduced to an amount that comports with reasonable comparable property values; and

b. Recognizing the tax exempt nature of the use of the property for religious purposes as a place of worship.

5. Following the hearing, a Decision was mailed by the Board.

6. Appellant is filing this appeal to the Court of Common Pleas of Blair County.

7. The reasons for the appeal are as follows:

The decisions fail to comply with the statutory directives and relevant case law precedents. The process is in violation of the relevant statutes.

FILED
BLAIR COUNTY, PA
CAROL A. NEWMAN
2017 NOV 13 P 1:08
ROTHSCHILD
CLERK OF COURTS
CLERK OF ORPHANS COURT

The process had pre-determined results, which are neither fair nor equitable, and which fail to comply with the relevant law.

The decisions fail to comport to the process of determination of valuation as set forth in the relevant statute and case law.

The decisions fail to consider relevant appraisals, comparative market analyses, economic and social conditions of the location of the subject property, and other evidence produced and/or discussed and/or argued by the Appellant at the Board appeal hearing.

The decisions fail to recognize the tax exempt nature of the property's use for religious purposes as a place of worship.

8. Appellant has suffered financial damages, and will suffer additional damages, including but not limited to the cost of appraisals, comparative market analyses, lost compensation due to time lost from employment to attend the various meetings and hearings proscribed in this process, compensation for experts and professionals representing Appellant, filing fees, fees for service of process, as well as other costs and fees, to be determined, in excess of Five Hundred and no/100 (\$500.00) Dollars, but within the amounts specified as arbitration limits.


WHEREFORE, Appellant requests this Honorable Court to:

1. Examine, determine, and set a lower amount as the assesses value for the subject property to such amount as is just, right, and proper, in accordance with the relevant statutes and case law extant in the Commonwealth of Pennsylvania,
2. Recognize the tax exempt nature of the use of the property for religious purposes as a place of worship as set forth in the applicable statutes and case law extant in the Commonwealth of Pennsylvania, and
3. Award damages to the Appellant in an amount in excess of Five Hundred and no/100 (\$500.00) Dollars, but within the amounts specified as arbitration limits.

Date: 11/13/2017

Appellant signature(s):



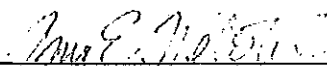




Appellant mailing address:

1111 North Juniata Street, Hollidaysburg, PA 16648

Amy E. Webster, Attorney at Law

By 

Amy E. Webster, Esquire, Attorney for Appellant
1111 N. Juniata Street, Hollidaysburg, PA 16648

BLAIR COUNTY ASSESSMENT OFFICE
 423 ALLEGHENY ST, SUITE 041
 HOLLIDAYSBURG, PA 16648-2022

BOARD OF ASSESSMENT APPEALS

Richard Moran, Chairman
 Linda K. Smith, Vice Chairman
 James B. Crawford, Secretary

Telephone: 814.693.3110
 Hours: 8:00AM - 4:00PM

WEBSTER AMY E & GREEN LINDSAY E &
 SILL DAVID E
 1111 N JUNIATA ST
 HOLLIDAYSBURG PA 16648-1142

Parcel Identifier:
 11.07-10.-003.00-000
 Control Number: 00016223
 MAILING DATE: OCTOBER 27, 2017
 APPEAL DEADLINE: NOVEMBER 26, 2017

BOARD OF ASSESSMENT APPEALS DECISION NOTICE - THIS IS NOT A TAX BILL

This is a notice of a change to the assessed valuation or status of this property.

REASON FOR CHANGE: 04 - APPEAL BOARD DECISION (DENIED - NO CHANGE)

The Board of Assessment Appeals has issued this decision regarding your tax assessment appeal. You may appeal this decision to the Court of Common Pleas by filing the appropriate paperwork with the Prothonotary's office within 30 days of the date of this notice.

FUTURE TAX BILLING BASIS		
ASSESSMENT	OLD 350,000	NEW 350,000
TAX STATUS	Taxable	Taxable
C&G STATUS		
Homestead Approved		

EFFECTIVE: 01/01/2018 for County/Munic
 07/01/2018 for School

MARKET-BASED ASSESSMENT		
Land	OLD 35,000	NEW 35,000
Improvements	315,000	315,000
TOTAL	350,000	350,000
Predetermined Ratio:100% of 2016 Base Year Value		

PROPERTY DESCRIPTION
Munic.: 11 - HOLLIDAYSBURG BOROUGH School: 4 - HOLLIDAYSBURG AREA SD
Control Number: 00016223 Password for free Web Access: BLPNZIVH (By Property at CourthouseOnline.com/pa-bl-ao)
Property Location: 1111 N JUNIATA ST
Land Size: .72 acres
Property Type: R Residential (Under 10 Acres)

CLEAN AND GREEN (C&G) ASSESSMENT		
Land	OLD N/A	NEW N/A
Improvements	N/A	N/A
TOTAL	N/A	N/A
Land value based on rates provided by the State.		

CHANGE OF TAX BASIS - NET CHANGE		
	COUNTY/MUNIC	SCHOOL
Land	0	0
Improvements	0	0
TOTAL	0	0
Effects Future Billing Cycles Only		

COUNTY of BLAIR

ASSESSMENT OFFICE

COURTHOUSE
423 ALLEGHENY ST STE 041
HOLLIDAYSBURG PA 16648-2022
DeAnna M. Heichel
Chief Assessor/Director of Assessment
Phone (814) 693-3110
Fax (814) 693-3115

BRUCE ERB
Chairman
TERRY TOMASSETTI
Vice Chairman
TED BEAM, JR.
Secretary
HELEN P. SCHMITT
County Administrator
NATHAN W. KARN, SR.
Solicitor

RE: Parcel Number 11.07-10.-003.00-000

Dear Property Owner,

The Blair County Board of Assessment Appeals, having considered your appeal of value and request for tax exemption on October 11, 2017, has made two decisions with reference to your 2018 assessment.

One "Board of Assessment Appeals Decision Notice" is being mailed for the two reasons you appealed your property in regards to assessed value and tax status. I am attaching this cover letter to clarify the decisions for both heard on October 11, 2017.

In regard to your tax status, it was DENIED – NO CHANGE, as the "Old Tax Status" is "Taxable" and the "New Tax Status" remains "Taxable" as stated on the enclosed notice.

In regard to your assessed value, it was DENIED – NO CHANGE, as the "Old Assessment" is \$350,000 and your "New Assessment" remains \$350,000.

You may appeal the decisions to the Court of Common Pleas by filing the appropriate paper work with the Prothonotary's office within 30 days of the attached notice.

Sincerely,

DeAnna M. Heichel
Chief Assessor/Director of Assessment

Enclosure

COUNTY OF BLAIR

OFFICE OF THE COUNTY SOLICITOR

COURT HOUSE
423 ALLEGHENY ST., STE. 441A
HOLLIDAYSBURG PA 16648-2022
TELEPHONE (814) 693-3030
FAX NO. (814) 693-3033

BRUCE ERB
President
TERRENCE E. TOMASSETTI
Vice President
TED BEAM, JR.
Secretary
HELEN P. SCHMITT
Chief Clerk
NATHAN W. KARN, SR.
Solicitor

Reply to:
Nathan W. Karn, Sr.
Blair County Solicitor
PO Box 415
Hollidaysburg, PA 16648
(814) 695-7581 (Private Law Office)
nkarn@blairco.org

November 13, 2017

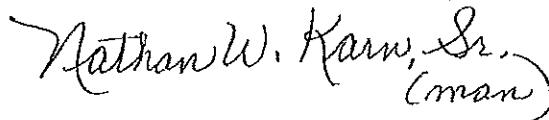
Amy E. Webster,
David E. Sill and Lindsay E. Green
1111 North Juniata Street
Hollidaysburg, PA 16648

*In re: Amy E. Webster, et al v. Blair County Board of Assessment Appeals
No. 2017 GN 3190*

Dear Attorney Webster, Mr. Sill and Ms. Green:

Enclosed please find my Entry of Appearance which I filed today on behalf of Blair County in regard to the exemption issue only in the referenced matter.

Sincerely,



Nathan W. Karn, Sr.

NWK/man
Enclosure

pc: Beard Legal Group
Janet Burkardt, Esquire
Blair County Assessment Office

COPY

IN THE COURT OF COMMON PLEAS OF BLAIR COUNTY, PENNSYLVANIA

AMY E. WEBSTER, DAVID E. SILL,
And LINDSAY E. GREEN,
Appellants

CIVIL DIVISION – LAW

NO. 2017 GN 3190

vs.

BLAIR COUNTY BOARD OF ASSESSMENT
APPEALS,

PRAECIPE FOR ENTRY
OF APPEARANCE ON
EXEMPTION ISSUE ONLY

Appellee

Filed on behalf of:
BLAIR COUNTY BOARD OF
ASSESSMENT APPEALS and
THE COUNTY OF BLAIR

Counsel of Record for this Party:

NATHAN W. KARN, SR., ESQ.
Blair County Solicitor
PA I.D. # 86068

401 Allegheny Street
P.O. Box 415
Hollidaysburg, PA 16648
(814) 695-7581

FILED
BLAIR COUNTY, PA
CAROL A. NEWMAN
2017 NOV 13 P 3:01
PROTHONOTARY
CLERK OF COURTS
CLERK OF ORPHANS COURT

AMY E. WEBSTER, DAVID E. SILL,
And LINDSAY E. GREEN,
Appellants

vs.

BLAIR COUNTY BOARD OF
ASSESSMENT APPEALS
Appellee

IN THE COURT OF COMMON PLEAS
OF BLAIR COUNTY, PENNSYLVANIA

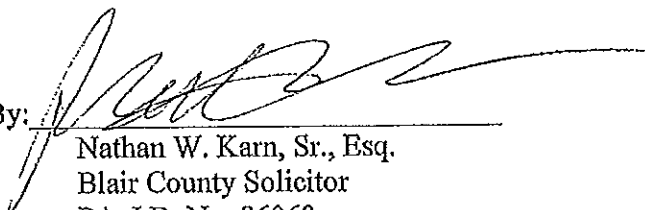
CIVIL DIVISION - LAW

NO. 2017 GN 3190

PRAECIPE FOR ENTRY OF APPEARANCE

TO PROTHONOTARY OF BLAIR COUNTY:

Please note the appearance of the undersigned as counsel of record on the issue of exemption issues only for BLAIR COUNTY BOARD OF ASSESSMENT APPEALS, the Appellee in the above matter, and the COUNTY OF BLAIR, an interested party, noting that all papers and process for service upon said parties may be served upon the undersigned at 401 Allegheny Street, P. O. Box 415, Hollidaysburg, Pennsylvania 16648. The undersigned is entering his appearance as to matters regarding the exemption status only, and the County of Blair has other legal counsel that will be handling the market value aspect of this appeal.

By: 
Nathan W. Karn, Sr., Esq.
Blair County Solicitor
PA I.D. No. 86068

Dated: November 13, 2017

CERTIFICATE OF SERVICE

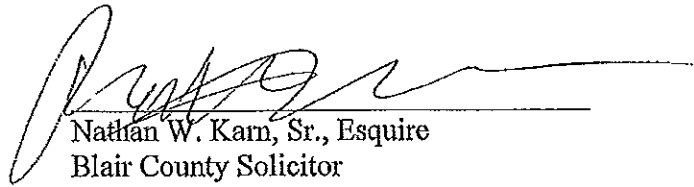
I hereby certify that a true and correct copy of the foregoing document was served on the 13th day of October, 2017 by U.S. Mail, first class, postage prepaid, addressed to the following:

Amy E. Webster, David E. Sill
And Lindsay E. Green
1111 North Juniata Street
Hollidaysburg, PA 16648

Beard Legal Group
P.O. Box 1311
Altoona, PA 16603

Janet Burkardt, Esquire
Weiss Burkardt Kramer, LLC
445 Fort Pitt Boulevard, Ste. 503
Pittsburgh, PA 15219

Blair County Assessment Office
c/o DeAnna Heichel
423 Allegheny Street, Ste. 041
Hollidaysburg, PA 16648


Nathan W. Kam, Sr., Esquire
Blair County Solicitor
PA I.D. No.: 86068

AMY E. WEBSTER, DAVID E. SILL,
And LINDSAY E. GREEN,
Appellant
vs.

BLAIR COUNTY BOARD OF
ASSESSMENT APPEALS,
Appellee

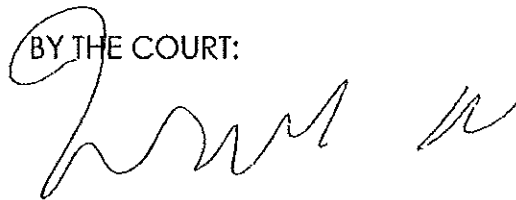
: IN THE COURT OF COMMON PLEAS
: BLAIR COUNTY, PENNSYLVANIA
:
: CIVIL ACTION--LAW
:
: NO. 2017 GN 3190
:
:

ASSESSMENT APPEAL MEDIATION SCHEDULING ORDER

AND NOW, this 26th day of November, 2017, it is hereby ORDERED AND DECREED as follows:

1. This case has been assigned to Charles Brown, Esq. for mediation purposes.
2. All those with full settlement authority shall be personally present for the mediation session.
3. A mediation of the Appeal from the Decision of the Board of Assessment shall be held on the 16 day of January, 2018, at 9:00 (am/pm), at Room 2B, Blair County Courthouse, Hollidaysburg, PA.
4. Three copies of any evidence to be used in a hearing must be brought to the mediation including an appraisal of the subject property if available.

BY THE COURT:



Judge

COUNTY OF BLAIR

OFFICE OF THE COUNTY SOLICITOR

COURT HOUSE
423 ALLEGHENY ST., STE. 441A
HOLLIDAYSBURG PA 16648-2022
TELEPHONE (814) 693-3030
FAX NO. (814) 693-3033

BRUCE ERB
President
TERRENCE E. TOMASSETTI
Vice President
TED BEAM, JR.
Secretary
HELEN P. SCHMITT
Chief Clerk
NATHAN W. KARN, SR.
Solicitor

Reply to:
Nathan W. Karn, Sr.
Blair County Solicitor
PO Box 415
Hollidaysburg, PA 16648
(814) 695-7581 (Private Law Office)
nkarn@blairco.org

December 4, 2017

The Honorable Charles Brown
c/o Blair County Court Administrator's Office
423 Allegheny Street, Ste. 239
Hollidaysburg, PA 16648

*In re: Amy E. Webster, et al v. Blair County Board of Assessment Appeals
No. 2017 GN 3190*

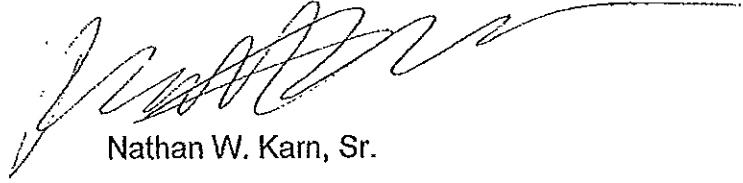
Dear Judge Brown:

I am writing with respect to Judge Kagarise's Mediation Scheduling Order dated November 20, 2017 setting mediation in the above-captioned case for January 16, 2018 at 9:00 a.m. Appellant has raised two separate and distinct issues on appeal; namely, (1) a challenge to the assessed value of the property; and (2) status of the property as taxable believing the property should be exempt from taxation. You will note from the file that I have entered my appearance on behalf of the County of Blair solely for the issue of exempt status. Attorney Janet Burkardt represents the County with respect to the value issue.

As the taxable status of property is solely a legal matter (the property either meets the law for exemption or it does not), the issue of exemption is not a matter the taxing bodies can mediate. While it certainly makes sense to mediate the current assessed value for the property, the Blair County Court of Common Pleas should schedule a status conference with respect to the exemption issue so that the discovery process can be put in place and ultimately a hearing scheduled, if needed, following discovery. In light of the above, I will not be attending the mediation on behalf of the County of Blair with respect to the exemption issue.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nathan W. Karn, Sr.', with a long horizontal flourish extending to the right.

Nathan W. Karn, Sr.

NWK/man

pc: Amy E. Webster, Esquire
Janet Burkardt, Esquire
Brendan Moran, Esquire
Blair County Assessment Office

COUNTY of BLAIR



Janice Meadows
District Court Administrator

Telephone 814-693-3050
Facsimile 814-693-3289

OFFICE OF COURT ADMINISTRATOR
423 ALLEGHENY STREET, SUITE 239
HOLLIDAYSBURG, PA. 16648

Madeline Shea
Deputy Court Administrator

Mary Wilt
Deputy Court Administrator

February 13, 2018

Amy Webster, Esq.
1111 N. Juniata Street
Hollidaysburg, PA 16648

Nathan Karn, Esq.
401 Allegheny Street
Hollidaysburg, PA 16648

Brendan Moran, Esq.
3366 Lynwood Drive, Suite 1311
Altoona, PA 16603

**In RE: Amy Webster vs Blair County Board of Assessment Appeals
2017 GN 3190
Pretrial on Tax Exempt Status**

The above captioned matter has been scheduled for the following date and time:

Date: Monday, March 12, 2018
Place: Courtroom 1
Presiding: The Honorable Elizabeth A. Doyle
Time: 10:30am

Please contact this office if you have any questions regarding this matter. Counsel is responsible for notifying all parties and witnesses.

Sincerely,

Mary Wilt
Deputy Court Administrator

Cc: The Honorable Elizabeth A. Doyle
Court Administration

IN THE COURT OF COMMON PLEAS OF BLAIR COUNTY, PENNSYLVANIA

AMY WEBSTER ET AL, :
PLAINTIFF, :
V. : 2017 GN 3190
BLAIR COUNTY BOARD OF ASSESSMENT APPEALS, :
DEFENDANT. :

ELIZABETH A. DOYLE

PRESIDING JUDGE

AMY WEBSTER, ESQ.

COUNSEL FOR PLAINTIFF

NATHAN KARR, ESQ.

COUNSEL FOR BLAIR COUNTY
BOARD OF ASSESSMENT
APPEALS and THE COUNTY
OF BLAIR

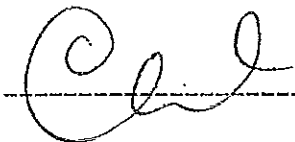
ORDER

AND NOW, this 15^r day of March, 2018, the matter having come
before the Court in status conference, the following is appropriate:

1. The matter is scheduled for a Trial by Court on the 30 day of
May, 2018 in courtroom # 4 for 1 hour. at 9:30am
2. All discovery, including the exchange of any real estate
appraisal shall be requested by March 30, 2018 and submitted
by April 13, 2018.

3. By April 30, 2018 counsel will advise the Court as to whether oral argument is requested on the issue of exemption.

BY THE COURT:

 P.J.

Mary Ellen MacPhail

From: Janet Burkardt
Sent: Tuesday, March 13, 2018 9:34 AM
To: Mary Ellen MacPhail
Subject: FW: Webster Assessment Appeal 2017 GN 31909
Attachments: 20180313090111501.pdf

From: Nathan Karn <nkarn@blairco.org>
Sent: Tuesday, March 13, 2018 9:07 AM
To: Connie Miller <cmiller@blairco.org>; Thomas Rice <trice@blairco.org>
Cc: Janet Burkardt <jburkardt@wbklegal.com>; bmoran@andrewsbeard.com; DeAnna Helchel <dhelchel@blairco.org>
Subject: Webster Assessment Appeal 2017 GN 31909

Connie and Tom:

I was copied on a notice for a conference (attached) in the matter set forth in the subject line. I am assuming this is the value part of this appeal as Judge Doyle held a conference yesterday with Attorney Webster and myself on the exemption issue. She is going to be issuing an order for the exemption matter out of yesterday's conference. Attorney Janet Burkardt is handling the value part of this appeal. I have copied her on this email so she is aware as I will not be attending.

As a suggestion, for these matters that are split (and I believe they should be split), it may help for tracking as part of the caption to indicate "value appeal" or "exemption appeal".

Nathan W. Karn, Sr., Esq.
Blair County Solicitor

For convenience, call me at my private law office: 814-695-7581
or fax: 814-695-1750

COUNTY of BLAIR



Janice Meadows
District Court Administrator

Telephone 814-693-3050
Facsimile 814-693-3289

OFFICE OF COURT ADMINISTRATOR
423 ALLEGHENY STREET, SUITE 239
HOLLIDAYSBURG, PA. 16648
March 9, 2018

Madeline Shea
Deputy Court Administrator

Mary Wilt
Deputy Court Administrator

Amy E. Webster, Esquire
1111 North Juniata Street
Hollidaysburg, PA 16648

Brendan J. Moran, Esquire
Andrews & Beard
3366 Lynnwood Drive
PO Box 1311
Altoona, PA 16603-1311

Nathan W. Karn, Sr., Esquire
P.O. Box 415
401 Allegheny Street
Hollidaysburg, PA 16648-0415

**Subject: Amy E. Webster Vs. Blair County Board of Assessment
2017 GN 3190
Pre Trial Conference**

The above captioned matter has been scheduled as follows:

Date: Wednesday, MARCH 21, 2018
Time: 1:45 P.M.
Place: Courtroom # 5
Presiding: The Honorable Judge Timothy M. Sullivan

Please feel free to contact this office if you have questions regarding this matter.
Counsels are responsible for notifying their parties and witnesses.

Thomas M. Rice
Civil Processor

Cc: Blair County Tax Assessment Office
Court Administration

COUNTY OF BLAIR

OFFICE OF THE COUNTY SOLICITOR

COURT HOUSE
423 ALLEGHENY ST., STE. 441A
HOLLIDAYSBURG PA 16648-2022
TELEPHONE (814) 693-3030
FAX NO. (814) 693-3033

BRUCE ERB
President
TERRENCE E. TOMASSETTI
Vice President
TED BEAM, JR.
Secretary
HELEN P. SCHMITT
Chief Clerk
NATHAN W. KARN, SR.
Solicitor

Reply to:
Nathan W. Karn, Sr.
Blair County Solicitor
PO Box 415
Hollidaysburg, PA 16648
(814) 695-7581 (Private Law Office)
nkarn@blairco.org

March 15, 2018

Amy E. Webster, David E. Sill,
and Lindsay E. Green
1111 North Juniata Street
Hollidaysburg, PA 16648

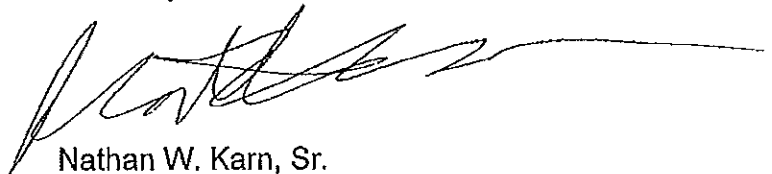
*In re: Amy E. Webster, David E. Sill and Lindsay E. Green v.
Blair County Board of Assessment Appeals
No. 2017 GN 3190*

Dear Ms. Webster, Mr. Sill and Ms. Green:

Enclosed please find Defendant's Request for Admissions, Interrogatories and Request for Production of Documents Directed to Plaintiff – First Set. Also enclosed is a time-stamped copy of the Notice of Intent to Serve which I filed of record today.

Thank you for your anticipated timely response to the enclosed.

Sincerely,



Nathan W. Karn, Sr.

NWK/man
Enclosures

COPY

IN THE COURT OF COMMON PLEAS OF BLAIR COUNTY, PENNSYLVANIA

AMY E. WEBSTER, DAVID E. SILL,
And LINDSAY E. GREEN,
Appellants

CIVIL DIVISION – LAW

NO. 2017 GN 3190

vs.

BLAIR COUNTY BOARD OF ASSESSMENT
APPEALS,

Appellee

NOTICE OF INTENT TO SERVE
DEFENDANT'S REQUEST
FOR ADMISSIONS,
INTERROGATORIES AND
REQUEST FOR PRODUCTION
OF DOCUMENTS
DIRECTED TO PLAINTIFF -
FIRST SET

Filed on behalf of:
BLAIR COUNTY BOARD OF
ASSESSMENT APPEALS and
THE COUNTY OF BLAIR

Counsel of Record for this Party:

NATHAN W. KARN, SR., ESQ.
Blair County Solicitor
PA I.D. # 86068

401 Allegheny Street
P.O. Box 415
Hollidaysburg, PA 16648
(814) 695-7581

PROthonary
CLERK OF COURTS
CLERK OF ORPHANS COURT

2018 MAR 15 P 1:57

FILED
BLAIR COUNTY, PA
CAROL A. NEWMAN

AMY E. WEBSTER, DAVID E. SILL,
And LINDSAY E. GREEN,
Appellants

vs.

BLAIR COUNTY BOARD OF
ASSESSMENT APPEALS
Appellee

IN THE COURT OF COMMON PLEAS
OF BLAIR COUNTY, PENNSYLVANIA

CIVIL DIVISION - LAW

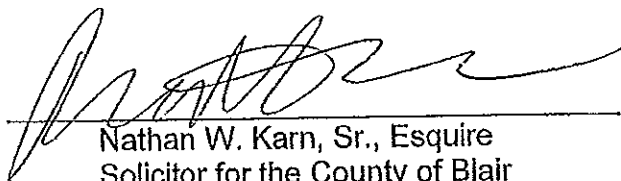
NO. 2017 GN 3190

**NOTICE OF SERVICE OF DEFENDANT'S REQUEST FOR ADMISSIONS,
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO PLAINTIFF – FIRST SET**

TO THE PROTHONOTARY OF BLAIR COUNTY:

You are hereby notified that on the 15th day of March, 2018, the Defendant, Blair County Board of Assessment Appeals, served Request for Admissions, Interrogatories and Request for Production of Documents -- First Set upon the Plaintiff, Amy E. Webster, David E. Sill and Lindsay E. Green, by mailing the same via First-Class United States Mail, postage prepaid, addressed to the following:

Amy E. Webster, David E. Sill
And Lindsay E. Green
1111 North Juniata Street
Hollidaysburg, PA 16648

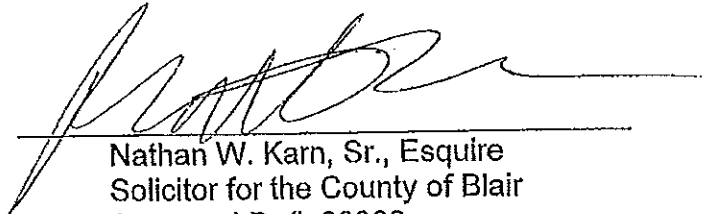


Nathan W. Karn, Sr., Esquire
Solicitor for the County of Blair
Attorney I.D. #: 86068
401 Allegheny St.
Hollidaysburg, PA 16648
(814) 695-7581

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the 15th day of March, 2018 by U.S. Mail, first class, postage prepaid, addressed to the following:

Amy E. Webster, David E. Sill
And Lindsay E. Green
1111 North Juniata Street
Hollidaysburg, PA 16648

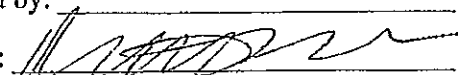


Nathan W. Karn, Sr., Esquire
Solicitor for the County of Blair
Attorney I.D. #: 86068
401 Allegheny St.
Hollidaysburg, PA 16648
(814) 695-7581

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Blair County Board of Assessment Appeals

Signature: 

Name: Nathan W. Karn, Sr., Esq., Blair County Solicitor

Attorney No. (if applicable): 86068

AMY E. WEBSTER, DAVID E. SILL,	:	IN THE COURT OF COMMON PLEAS
And LINDSAY E. GREEN,	:	OF BLAIR COUNTY, PENNSYLVANIA
Appellants	:	
	:	CIVIL DIVISION - LAW
	:	
vs.	:	
	:	
BLAIR COUNTY BOARD OF	:	
ASSESSMENT APPEALS	:	NO. 2017 GN 3190
Appellee	:	

DEFENDANT'S REQUEST FOR ADMISSIONS,
INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO PLAINTIFF – FIRST SET

TO: Amy E. Webster, David E. Sill
And Lindsay E. Green
1111 North Juniata Street
Hollidaysburg, PA 16648

INSTRUCTIONS

A. In accordance with Pa.R.C.P. Rule 4005, these original written Interrogatories have been served upon you to be answered by the party served or, if the party served is a public or private corporation or similar entity or a partnership or association, by any officer or agent, who shall furnish such information as if available to the party.

B. In accordance with Pa.R.C.P. Rule 4006(a)(1), written Answers shall be inserted in the spaces provided in the Interrogatories. If there is insufficient space to answer an Interrogatory, the remainder of the answer shall follow on a supplemental sheet.

C. In accordance with Pa.R.C.P. Rule 4006(b), where the answer to an Interrogatory may be derived or ascertained from the records of the party upon whom the Interrogatory has been served or from an examination, audit or inspection of the party's records, or from a compilation, abstract or summary based thereon, and the burden of

deriving or ascertaining the answer would be substantially the same for the party serving the Interrogatory as for the party served, a sufficient answer to such an Interrogatory shall be to specify the records from which the answer may be derived or ascertained and to afford the party serving the Interrogatory reasonable opportunity to examine, audit or inspect those records and to make copies, compilations, abstracts or summaries.

D. For purposes of these Interrogatories, the following definitions shall apply:

1. "Document" means any written, recorded or graphic matter, however, produced or reproduced.
2. "Identify" or "identification" when used in reference to an individual person means to state his name, present or last known address, present or last known position and business affiliation and his position and business affiliations at all times during the period covered by the Complaint.
3. "Describe" or "identify" when used in reference to a document means to state the type of document (for example, letter, memorandum, telegram, chart, etc.), the date, author, addresses, title file and identifying number and symbol, and the name and address of its custodian. If any such documents are no longer in your possession or subject to your control, state what disposition was made of it and the date thereof.

E. These Interrogatories are intended as continuing Interrogatories requiring you to answer by Supplemental Answer, setting forth any information within the scope of these Interrogatories as may be acquired by you, your agents, attorneys, or representatives following your original Answers. Pursuant to Pennsylvania Rule of Civil Procedure 4007.4:

1. The parties are under a duty to reasonably supplement their responses with respect to any question directly addressed to the identity and location of persons having knowledge of discoverable matters and the identity of each person expected to be called as an expert witness at trial, the subject matter on which he is expected to testify and the substance of his testimony as provided in Rule 4003.5(a)(1);

2. The parties or an expert witness are under a duty to reasonably amend a prior response if they obtain information upon the basis of which:

(a) They know that the response was incorrect when made; or

(b) They know that the response, though correct when made, is no longer true.

F. In accordance with Pa.R.C.P. 4006(a)(2), each Interrogatory shall be answered fully and completely unless objected to, in which event the reasons for the objection shall be stated in lieu of an answer. The answers shall be signed by the person making them, and the objections shall be signed by the attorney making them. The statement of an objection shall not excuse the answering party from answering all remaining Interrogatories to which no objection is stated. The answering party shall file and serve a copy of the answers, and objections, if any, within thirty (30) days after the service of the Interrogatories. The party submitting the Interrogatories may move the Court to dismiss an objection and direct that the Interrogatory be answered.

G. Pursuant to Pa.R.C.P. 4014(b), the following request for admission shall be admitted, within thirty days after service of the request unless the Party to whom the request is directed serves upon the party requesting the admission an answer verified by the party or an objection, signed by the party or the party's attorney. If objection is

made, the reasons therefore shall be stated. The answer shall admit or deny the matter or set forth in detail the reasons why the answering party cannot truthfully do so. A denial shall fairly meet the substance of the requested admission, and when good faith requires that a party qualify the answer or deny only a part of the matter of which an admission is requested, the party shall specify so much of it as is true and qualify or deny the remainder. An answering party may not give lack of information or knowledge as a reason for failure to admit or deny unless the answering party states that he or she has made reasonable inquiry and that the information known or readily obtainable by him or her is insufficient to enable him or her to admit or deny. A party who considers that a matter of which an admission has been requested presents a genuine issue for trial may not, on that ground alone, object to the request.

REQUEST FOR ADMISSIONS

1. Section 8812 of Title 53 of the Pennsylvania Consolidated Statutes subpart a provides that the following property shall be exempt from real estate taxes: (1) All churches, meetinghouses or other actual places of regularly states religious worship, with the ground annexed necessary for their occupancy and use. The foregoing listed exemption found in Section 8812(a)(1) serves as the basis for which you are seeking exempt status for a portion of the building located at 1111 North Juniata Street, Hollidaysburg, PA 16648 and bearing tax parcel map number 11.07-10..-003.00-000.

ADMIT _____ DENY _____

2. The approximate square footage of the building located at 1111 North Juniata Street, Hollidaysburg, PA 16648 is 6,366 square feet.

ADMIT _____ DENY _____

INTERROGATORIES

1. Identify each room of the building located at 1111 North Juniata Street, Hollidaysburg, PA that is utilized for regularly stated religious worship by indicating the floor the room is located on and the square footage in the room.

ANSWER:

2. Is the space identified in Interrogatory No. 1 the same 500 square feet for which a conditional use was sought on behalf of Faithfulness Ministries, Inc. from the Hollidaysburg Borough Council in June and July, 2015? If not, please explain.

ANSWER:

3. Please identify all types of regularly stated religious worship that occurs in the space(s) identified in Interrogatory No. 1 including providing the days of the week and hours in which such religious observances occur.

ANSWER:

4. Please identify all other uses for the space described in Interrogatory No. 1 when not used for religious observance that is identified in Interrogatory No. 3.

ANSWER:

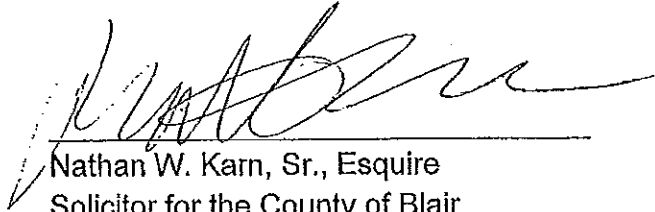
5. 53 Pa. C.S.A. §8812(b)(2) provides the following: Except as otherwise provided in subsection (a)(12) [related to playground equipment], all property, real and personal, actually and regularly used and occupied for the purposes specified in this section shall be subject to taxation unless the person or persons, associations or corporation so using and occupying the property shall be seized of the legal or equitable title in the realty and possessor of personal property absolutely. Please identify any and all statutory laws or Pennsylvania case law that supports your position that the use of space in the building located at 1111 North Juniata Street, Hollidaysburg, PA for regularly stated worship is exempt from real estate taxation despite the fact that title to the property is not in a church or other religious organization's name.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please provide any and all documents in support of any answer to the Request for Admission and/or Interrogatories that you intend to rely on in the trial, hearing and/or oral argument.

2. Please produce any and all documents you intend to offer as an exhibit in the trial and/or hearing of this matter.

A handwritten signature in black ink, appearing to read 'Nathan W. Karn, Sr.', written over a horizontal line.

Nathan W. Karn, Sr., Esquire
Solicitor for the County of Blair
Attorney ID #86068

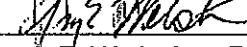
AMY E. WEBSTER, et al. : IN THE COURT OF COMMON PLEAS
Appellants : BLAIR COUNTY, PENNSYLVANIA
Vs. : CIVIL ACTION—LAW
BLAIR COUNTY BOARD :
OF ASSESSMENT APPEALS : No. 2017 GN 3190
Appellee :

PRAECIPE TO WITHDRAW ACTION AND DISCONTINUE

TO THE PROTHONOTARY:

Kindly mark the above-captioned matter withdrawn by the Appellants and discontinued.

AMY E. WEBSTER, ATTORNEY AT LAW

By 

Amy E. Webster, Esquire
Attorney for Appellants

DATED: March 26, 2018

BLAIR COUNTY, PA
2018 MAR -2 P 12:03
CLERK OF COURT