

# Adams County Legal Journal

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BECKER, TRUSTEE, AND LISA M. PHILLIPS

*This opinion is continued from the last issue (September 25, 2015)*



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NOTICE BY THE ADAMS COUNTY  
CLERK OF COURTS

NOTICE IS HEREBY GIVEN to all heirs, legatees and other persons concerned that the following accounts with statements of proposed distribution filed therewith have been filed in the Office of the Adams County Clerk of Courts and will be presented to the Court of Common Pleas of Adams County - Orphans' Court, Gettysburg, Pennsylvania, for confirmation of accounts entering decrees of distribution on Friday, October 9, 2015, 8:30 am.

**SNEERINGER**— Orphans' Court Action Number - OC-71-2014. The First and Final Account of Sandra M Sneeringer, Executrix of the Estate of Edward M Sneeringer, deceased, late of, Mount Pleasant Township, Adams County, Pennsylvania.

Kelly A. Lawver  
Clerk of Courts

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FICTITIOUS NAME NOTICE

NOTICE IS HEREBY GIVEN that on August 28, 2015, an Application was filed under the Fictitious Name Act, No. 1982-295 (54 Pa.C.S. §311) in the Office of the Secretary of the Commonwealth of Pennsylvania setting forth that Champion Lincoln-Mercury Inc. is the only person or entity owning or interested in a business, the character of which is Sales of Preowned Vehicles, and that the name, style and designation under which said business is and will be conducted is BATTLEFIELD-COLONIAL PREOWNED. And the location where said business is and will be located is 941 Fairfield Road, Gettysburg, PA 17325.

Champion Lincoln-Mercury Inc.  
d/b/a Battlefield Kia  
85 V Twin Drive  
Gettysburg, PA, 17325

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STRABAN TOWNSHIP, ADAMS COUNTY,  
PENNSYLVANIA V. HANOVERIAN TRUST, HEYWOOD  
BECKER, TRUSTEE, AND LISA M. PHILLIPS

*Continued from last issue (9/25/2015)*

When originally deciding in 2014 that the trust must be represented by counsel, the parties had not drawn our attention to any case precisely on point and our research had not revealed any Pennsylvania case which had addressed the issue whether a trust or trustee needed to be represented by counsel before the courts of this Commonwealth. Nevertheless we examined a body of law which we felt supported the Township's position.

Our Superior Court first addressed the issue of whether a corporation may appear in court and be represented by a non-lawyer in ***Walacavage v. Excell 2000, Inc.***, 480 A.2d 281 (Pa. Super. 1984). That Court adopted the reasoning shared by other jurisdictions that a corporation may appear in court only through an attorney admitted to practice before the court. The reasoning behind the rule is that a corporation can do no act except through its agents and only persons admitted to practice may represent the corporation before a court. The underlying concern behind the rule is not the protection of the shareholders but rather the administration of justice. Furthermore, persons who accept the advantages of incorporation must also bear the burdens, including the need to retain counsel to appear in court.

A decade after ***Walacavage*** was decided, the Superior Court was faced with the issue of whether a duly appointed power-of-attorney could institute a medical malpractice action on behalf of her principal in ***Kohlman v. Western Pennsylvania Hospital***, 652 A.2d 849 (Pa. Super. 1994). There, Smith (the attorney-in-fact) argued that under §5602(a)(20) of the Probate Code, 20 Pa. C.S.A. §5602(a)

(20), she was empowered by Kohlman (the principal) to “pursue claims and litigation.” The court framed the issue as whether the unlicensed in-court representation of another is considered engaging in the practice of law and, thus, prohibited by Pennsylvania’s statute proscribing the unlicensed practice of law. In concluding that Smith could not pursue the action on behalf of Kohlman without counsel, the Court stated,

The constitution of this Commonwealth has exclusively granted to the Supreme Court of Pennsylvania the power to regulate the practice of law before all the courts of Pennsylvania. Pa. Const. art. V, §10. In particular, subsection (c) of Article V, section 10 provides:

(c) The Supreme Court shall have the power to prescribe general rules governing practice, procedure and the conduct of all courts ... and for admission to the bar and to practice law ...

Pa. Const. art. V, §10(c). To help administer to the bar, the Supreme Court has created the Pennsylvania Board of Law Examiners, which, among other things, establishes standards for admission to the bar. Pa. B.A.R. 104. The Supreme Court has also adopted the Code of Professional Conduct in order to govern the conduct of those individuals privileged to practice law in this Commonwealth. Additionally, to assure that lawyers admitted to practice in the Commonwealth continue their education to have and maintain the requisite knowledge and skill necessary to fulfill their professional responsibilities, the Pennsylvania Supreme Court has adopted the Pennsylvania Rules of Continuing Legal Education, Pa. R.C.L.E. 102 ... These stringent requirements are intended to protect and secure the public’s interest in competent legal representation ... Because the practice of law involves matters of extreme public concern, the General Assembly has also taken measures to control and prevent the unauthorized practice of law:

Any person who within this Commonwealth shall practice law ... without being an attorney at law ... commits a misdemeanor of the third degree.

42 Pa. C.S.A. §2524 (Supp. 1994).

While the rules and laws proscribing the unauthorized practice of law are clear, defining the abstract boundaries of the ‘practice of law’ would be an elusive, complex task, ‘more likely to invite criticism than to achieve clarity.’ ... This is so because the practice of law may well be used in a different sense for various purposes. Nonetheless, in *Dauphin County Bar Assoc. v. Mazzacaro*, 465 Pa. 545, 351 A.2d 229 (1976) the Supreme Court attempted to place the meaning of legal practice into some kind of workable format:

Where ... a judgment requires the abstract understanding of legal principles and refined skill for their concrete application, the exercise of legal judgment is called for. While at times the line between law and legal judgments may be a fine one, it is nevertheless discernible. Each given case must turn on a careful analysis of the particular judgment involved and the expertise that must be brought to bear on its exercise.

...

By whatever standard or definition, the in-court representation of another – a paradigmatic function of the attorney-at-law – amounts to the ‘practice of law’ in this Commonwealth.

*Kohlman*, 652 A.2d at 851-2.

In *Kohlman* the court held that Smith was generally engaged in the unauthorized practice of law. The court also noted that the Probate Code authorizes an agent to act as the client in an attorney-client relationship with respect to probate and administrative matters. However, that authority does not grant to the agent the right to practice law. To construe the Code otherwise would permit the attorney

licensing and admission requirements to be circumvented and would effectively abrogate the Judicial Code's prohibition against the unlicensed practice of law. Thus, an agent may stand in the shoes of the principal in deciding whether to prosecute, defend, settle or arbitrate a claim belonging to the principal and may control the attorney-client relationship. However, the agent lacks authority to litigate pro se in the principal's stead. *Id.* at 852-3.

The Court of Common Pleas of Westmoreland County opined on the issue whether a trust needed to be represented by counsel in a condemnation action in *The New Victoria Trust v. Board of Health*, 23 Fid. Rptr. 2nd 254 (Westmoreland Co. 2003). There, the court recognized that various entities, such as corporations, non-profit associations, voluntary unincorporated associations of individuals, and political action committees must be represented by counsel before a court. The opinion also recognized that corporations can do no action except through its agents. The court felt that persons who accept the advantages of a trust for its business dealings also bear the burdens of that entity, including the need to hire counsel to represent it in court, and held that this trust required counsel.

Several years later in *Petition of Lawrence County Tax Claim Bureau*, 998 A.2d 675 (Pa. Comwlth Ct. 2010), another of our appellate courts discussed the extent to which corporations and partnerships must be represented by counsel in matters before the court. There, the Tax Claim Bureau of Lawrence County was proposing the judicial sale of real estate owned by NIC Land Company and upon which Family Way L. P. had a lienhold interest. An individual named Pius A. Uzamere filed an objection to the sale on behalf of Family Way. The Bureau moved to dismiss the objection because Uzamere was not licensed to practice law and, therefore, was not permitted to represent the interest of the owner (a corporation) or the lienholder

(a limited partnership). Initially, Uzamere contended that the Bureau's motion should be dismissed because of its untimeliness. He also asserted that he was the sole owner of the corporation and the general partner of the lienholder. The trial court dismissed Uzamere's objection and, based upon the reasoning in *The Spirit of the Avenger Ministries v Commonwealth*, 767 A.2d 1130 (Pa. Comwlth Ct. 2011) (which concerned the ability of a pastor to represent his church organized as a non-profit corporation in court), held that Uzamere, as a non-attorney, could not represent Family Way L. P.

On appeal, the court found Pennsylvania law to be clear that a corporation may not appear in a court of law unless represented by an attorney. It noted, however, that generally a partnership is different than a corporation in that a partnership is not recognized as an entity separate and apart from its members as is a corporation. Nevertheless, the court also noted that a limited partnership is unlike other partnerships in that a limited partnership is somewhat "quasi-corporate" in nature and can act only through its designated representative, the general partner. The general partner has unlimited liability for the obligations of the partnership whereas the limited partners (who are not also general partners) are not liable for the obligations of the limited partnership. Additionally, the court discussed Pa. R.C.P. 2126 (Definitions) which defines "partner" to only include the general partner, Rule 2127 (Actions by Partnerships and Liquidators) and Rule 2128 (Actions against Partnerships and Liquidators). Thus, the individual with unlimited liability for the partnership obligations is authorized to prosecute and defend actions arising from the partnership's activities. Commonwealth Court reversed the trial court and held that Uzamere, as the general partner of Family Way L.P., was entitled to object to the tax sale in his own name or on behalf of the partnership.

Finally, in *Petition of the Tax Claim Bureau of Westmoreland County*, 84 A.3d 337 (Pa. Comwlth Ct. 2013) the court addressed whether a decedent's estate needed to be represented by counsel. There, the Estate of Anna S. Rowley owned real estate that was subject to a judicial tax sale. Carl Miller, the Administrator of the Estate, filed a petition to vacate the sale. The Tax Claim Bureau filed a motion to dismiss claiming that Miller was engaging in the unauthorized practice of law by representing the estate. The trial court agreed but granted the estate sixty days to obtain counsel. On appeal the Commonwealth Court noted that the Pennsylvania Supreme Court, in *Harkness v. Unemployment Compensation Board of Review*, 920 A. 2d 162 (PA. 2007), held that what constitutes the practice of law must be determined on a case-by-case basis and that the court must keep the public interest of primary concern. In *Harkness*, the court outlined several factors to consider in determining whether a person should be able to represent the interests of another in litigation: 1) whether the proceedings by design are intended to be brief and informal and not intended to be intensely litigated; 2) whether the evidentiary rules apply; 3) the amounts generally at issue in proceedings of that type; 4) whether there is prehearing discovery; 5) whether normally only questions of fact and not complex legal issues are involved; and 6) whether the fact-finder is not required to be a lawyer.<sup>7</sup> The appellate court noted that, like a corporation, an estate can only act through an agent (the administrator) and by its very nature cannot represent

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<sup>7</sup> In *Harkness*, the court permitted a non-attorney representative to represent an employer in an unemployment compensation proceeding before a referee because 1) the compensation system must operate quickly, simply and efficiently; 2) the proceedings are by design brief and informal; 3) the claims are not intended to be intensely litigated; 4) the proceedings are not trials; 5) the rules of evidence are not mandated; 6) there is no pre-hearing discovery; 7) there is no requirement that the referee be a lawyer; 8) only minimal amounts of money are in controversy; and 9) issues generally involve questions of fact and not complex legal analysis.



itself. Applying the *Harkness* factors that court concluded that the administrator, as a non-lawyer, could not represent the estate in the proceedings.

Currently, we have expanded our research to include the Pennsylvania federal courts and have discovered a sampling of cases which address our issue. In *Van De Berg v. Commissioner of Internal Revenue*, 175 Fed. Appx. 539 (3rd Cir. 2009), the IRS had issued a tax deficiency notice to Stephen M. Van De Berg. Mr. Van De Berg challenged the notice by alleging that the income at issue was taxable to the Stephen M Van De Berg Trust and not him individually. He appeared before the Tax Court as trustee on behalf of the Trust. Both the Tax Court and the Circuit Court ruled that Mr. Van De Berg, as trustee, and not being an attorney, could not represent the trust in court. The court noted that

It has been the law for the better part of two centuries ... that a corporation may appear in the federal courts only through licensed counsel. As the courts have recognized, the rationale for that rule applies equally to all artificial entities ... Thus, a non-lawyer trustee, such as Van De Berg, may not represent a trust pro se before this Court.

175 Fed. Appx at 541.

The Third Circuit ruled similarly in *Marin v. Leslie*, 337 Fed. Appx. 217 (3rd Cir. 2009). There Marin initiated an action under 42 U.S.C. §1983 as trustee for Happy Trust Three. The District Court dismissed the case holding that Marin lacked standing as trustee because a pro se litigant cannot pursue a claim in a representative capacity in federal court. The Circuit Court wrote that

Marin does, however, have standing as trustee of Happy Trust Three, for the trust is the true party in interest and the trustee may sue on its behalf. In ruling to the contrary, the District Court conflated standing

with the rule of law prohibiting a pro se litigant from pursuing claims on another's behalf. Yet the District Court did not err in dismissing Marin's claims on behalf of the trust, for the court correctly held that he cannot pursue these claims pro se ... To assert these claims on behalf of the trust, Marin would need to retain counsel.

337 Fed. Appx. At 219-20.

Applying the principles from these cases I again conclude that generally a trust, such as the Hanoverian Trust, must be represented by counsel if it participates as a party in litigation of this nature. As noted, Becker clearly intended to create a trust to hold and manage real estate. Furthermore, he intended the trust to have the attributes of a business trust. As such, we can assume that he did so in order to gain all of the advantages of that type of entity such as protection from personal liability. Our Rules of Civil Procedure provide that an action shall be prosecuted against a corporation or similar entity in its corporate name, Pa. R.C.P. 2177, and a business trust is considered a "corporation or similar entity" for that purpose. Pa. R.C.P. 2176. Like a corporation and an estate, a trust can only act through its agent and that person must act in his fiduciary and not his individual personal capacity as respects the subject property. Allowing a trustee to represent the trust before the court by filing pleadings and briefs and engaging in legal argument raises all the concerns regarding the unauthorized practice of law raised in the above cases. Like the attorney-in-fact in *Kohlman*, the trustee should be the one who has the duty to decide whether to prosecute, defend or settle litigation and may be the one who engages counsel. He is not, however, the one who can make legal argument on behalf of the trust. It makes no difference whether the trustee holds title to the real estate. He is nevertheless acting on behalf of the trust in his fiduciary capacity.

Having concluded that a trust (via the trustee) must generally be represented by counsel before a court, the next issue is

whether the current litigation is the type of proceeding where counsel is required under the Harkness factors. The instant action involves an effort by the Township to secure injunctive relief against alleged violations of municipal regulations. Such a proceeding is not intended to be brief or informal but rather has been and will likely be intensely litigated. The evidentiary rules will apply in this proceeding. The action may not involve a financial amount at controversy but clearly the outcome of the litigation could have significant financial repercussions. The outcome will be fact driven but will also involve complex legal questions involving the interruption of the local ordinances. Finally, the fact-finder is a judge not a non-lawyer. When viewing these factors in total it is clear that a trust/trustee needs to be represented by counsel in this type of proceeding.

Despite our conclusion that a trust must be represented by counsel, it is possible that the controversy over whether the Hanoverian Trust itself must be represented by counsel has been rendered moot. The Trust was created in September 2003. The subject property was identified as the Trust Property in that document. Clearly the document identifies Becker as both the Trustee and Beneficiary. Thus, Becker, as trustee, held legal title to the trust property at the same time he, as the beneficiary, held the equitable title. Pursuant to the doctrine of merger when the two interests coalesced in the same person the trust actually terminated by operation of law at the point of creation. See *Patrick v. Smith*, 2 Pa. Super. 113 (1898); 20 Pa. C.S.A. §7732(a)(5) (providing that a trust is created if the same person is not the sole trustee and sole beneficiary of the trust); Restatement (Third) Trusts §69 (if the legal title to the property and the entire beneficial interest become united in one person the trust terminates); 34 Stand. Pa. Practice2nd §160:64 (where under the terms of an alleged trust instrument, the trustee and the beneficiary are the same person, the transaction amounts to an absolute conveyance, and, despite the use of the terminology “trust”, “trustee” and

“beneficiary” no trust is created because the parties acquiring both the legal and the beneficial ownership has full and complete title to the property). Becker, as Beneficiary, may have attempted to avoid termination in 2014 when he assigned his beneficial interest in the trust property; however, by that time the Trust had already terminated by operation of law.

Therefore, as of this moment it appears that Becker, individually, is the owner of the real estate.<sup>8</sup> As an individual Becker may proceed pro se in this litigation if he chooses to do so. However, because it was his intent to have the property held in trust he may seek to re-convey the property to a new trust. If he does so he is subject to the opinion of this Court that the trust/trustee must be represented by a licensed Pennsylvania attorney.

Accordingly, the attached Order is entered.

#### ORDER OF COURT

AND NOW, this 2<sup>nd</sup> day of September, 2015, for the reasons set forth in the attached Memorandum Opinion, Plaintiff’s Motion to Compel Defendant to Obtain Legal Counsel is denied.

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<sup>8</sup> We do not decide whether the 2014 assignment of Becker’s beneficial interest in the trust property to his wife created for her an equitable interest in the real estate entitling or requiring her joinder as a party to this litigation.

## ESTATE NOTICES

**NOTICE IS HEREBY GIVEN** that in the estates of the decedents set forth below, the Register of Wills has granted letters, testamentary of or administration to the persons named. All persons having claims or demands against said estates are requested to make known the same, and all persons indebted to said estates are requested to make payment without delay to the executors or administrators or their attorneys named below.

## FIRST PUBLICATION

## ESTATE OF JAMES W. ALTICE, DEC'D

Late of Straban Township, Adams County, Pennsylvania

Administratrix: Amanda M. Becker, 307 Lincoln Way East, Apt. B, New Oxford, PA 17350

Attorney: Gary E. Hartman, Esq., Hartman & Yannetti, 126 Baltimore Street, Gettysburg, PA 17325

## ESTATE OF JUANITA M. SPAHR, DEC'D

Late of Reading Township, Adams County, Pennsylvania

Executor: D'Ann Fahringer, c/o Sharon E. Myers, Esq., CGA Law Firm, PC, 106 Harrisburg Street, P.O. BOX 606, East Berlin, PA 17316

Attorney: Sharon E. Myers, Esq., CGA Law Firm, PC, 106 Harrisburg Street, P.O. BOX 606, East Berlin, PA 17316

## ESTATE OF FRANCIS W. WITCHER, DEC'D

Late of Franklin Township, Adams County, Pennsylvania

Executrix: Susan Witcher, 835 Hilltown Road, Biglerville, PA 17307

Attorney: John A. Wolfe, Esq., Wolfe, Rice & Quinn, LLC, 47 West High Street, Gettysburg, PA 17325

## SECOND PUBLICATION

## ESTATE OF ROSE M. ARENTZ, DEC'D

Late of Cumberland Township, Adams County, Pennsylvania

Executor: Joseph Arentz, Jr., 2848 Pumping Station Road, Fairfield, PA 17320

Attorney: John J. Murphy III, Esq., Patrono & Murphy, LLC, 28 West Middle Street, Gettysburg, PA 17325

## ESTATE OF FRANCIS G. HEINDEL, DEC'D

Late of Oxford Township, Adams County, Pennsylvania

Executrix: Jean Heindel, 3196 Hanover Pike, Hanover, PA 17331

Attorney: Elinor Albright Rebert, Esq., 515 Carlisle Street, Hanover, PA 17331

## ESTATE OF RANDALL L. ROSE a/k/a RANDALL LOU ROSE, DEC'D

Late of Germany Township, Adams County, Pennsylvania

Co-Executors: Mr. Edward L. Kehr and Mr. Dale C. Brown, Jr., P.O. Box 167, Biglerville, PA 17307

Attorney: Todd A. King, Esq., Campbell & White, P.C., 112 Baltimore Street, Suite 1, Gettysburg, PA 17325-2311

## ESTATE OF BRANDY LEE SEIFERD a/k/a BRANDY L. SEIFERD, DEC'D

Late of Liberty Township, Adams County, Pennsylvania

Administratrix: Susan C. Seiferd, 18 Fruitwood Trail, Fairfield, Pennsylvania 17320

Attorney: Stonesifer and Kelley, P.C., 209 Broadway, Hanover, PA 17331

## ESTATE OF ADAM M. WOLF, DEC'D

Late of Reading Township, Adams County, Pennsylvania

Ernest L. Wolf, 1031 Lake Meade Rd., East Berlin, PA 17316

Attorney: David K. James, III, Esq., 234 Baltimore St., Gettysburg, PA 17325

## THIRD PUBLICATION

## ESTATE OF RICHARD W. GLADFELTER, DEC'D

Late of Abbottstown, Hamilton Township, Adams County

Executor: David R. Gladfelter, 384 Honda Road, Littlestown, PA 17340

Attorney: George W. Swartz, II, Esquire, Mooney & Associates, (717) 398-2205, 18 E. Middle Street, Gettysburg, PA 17325

## ESTATE OF LORRAINE A. RUNK, DEC'D

Late of New Oxford Borough, Adams County, Pennsylvania

Executor: Rodger W. Dubbs, Jr., 1408 Chami Dr., Spring Grove, PA 17362

Attorney: Keith R. Nonemaker, Esquire, Guthrie, Nonemaker, Yingst & Hart, LLP, 40 York Street, Hanover, PA 17331, (717) 632-5315

## ESTATE OF VIOLET ANN SHRADER, DEC'D

Late of New Oxford, Straban Township, Adams County, Pennsylvania

Co-Executors: Earl R. Shrader, Jr., 275 Manor Drive, New Oxford, PA 17350; Keith Shrader, 2935 Oxford Road, New Oxford, PA 17350

Attorney: Clayton A. Lingg, Esquire, Mooney & Associates, (717) 846-4722, 40 E. Philadelphia Street, York, PA 17401

## ESTATE OF GLENN E. WIMSETT, DEC'D

Late of Union Township, Adams County, Pennsylvania

Personal Representative: Mrs. Kristen D. McKain, 720 Sells Station Road, Littlestown, PA 17340

Attorney: Arthur J. Becker, Jr., Esquire, Becker & Strausbaugh, P.C. 544 Carlisle Street, Hanover, PA 17331

## ESTATE OF CHARLES EDWARD WOLF, DEC'D

Late of Conewago Township, Adams County, Pennsylvania

Administrator: Timothy Edward Wolf, 224 Navajo Drive, Red Lion, PA 17356

## 2015 ADAMS COUNTY BENCH-BAR CONFERENCE

**Date:** Friday, October 30, 2015

**Place:** Gettysburg Hotel, Lincoln Square, Gettysburg, Pennsylvania

**Time:** Registration and breakfast begin at 8:00 a.m.

**CLE:** This program has been approved by the Pennsylvania Continuing Legal Education Board for up to 4.0 hours of substantive law, practice and procedure CLE credit and 1.0 hour of ethics, professional or substance abuse CLE credit.

**CLE Speakers:** Prof. Randy Lee – Plenary session: Lessons from Abe Lincoln  
Ellen Freedman – The Top Legal Technologies and The Paperless Office  
J. Paul Dibert – Pennsylvania Inheritance Tax Update  
Melissa P. Tanguay, Esq. & Sherri R. DePasqua, M.S.W. – An Attorney’s Guide to CYS  
Stuart B. Suss, Esq. – Criminal Law Update  
Arnold T. Shienvold, Ph.D. – Domestic Violence, Alienation, Abuse, and Custody Evaluations

Cost for Adams County Bar Association members is \$35.00 for the Conference. Cost for non-members is \$300.00 for the Conference or \$60.00 per credit hour. Full conference registration fee includes a light breakfast and lunch in addition to CLE credit. Registration form and payment must be received by Friday, October 16, 2015. Space is limited, so register early!

For registration inquiries and to make requests for reduced tuition due to economic hardship, please contact:

Cecelia Brown  
117 Baltimore Street, Room 305  
Gettysburg, PA 17325  
717-337-9812  
cbrown@adamscounty.us