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**Not admitted in Pennsylvania, admitted in the Commonwealth of Virginia. *Pro hac vice* motion to be filed.

TO:

Real Estate Commission of the Commonwealth of Pennsylvania

One Penn Center, 2601 N 3rd Street
Harrisburg, PA 17110

Department of State (Bureau of Professional and Occupational Affairs) of the Commonwealth of Pennsylvania

Penn Center, 2601 N 3rd Street
Harrisburg, PA 17110

Pennsylvania Office of Attorney General

16th Floor, Strawberry Square
Harrisburg, PA 17120

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

SARA LADD, SAMANTHA HARRIS, AND POCONO
MOUNTAIN VACATION PROPERTIES, LLC,

Petitioners,

v.

REAL ESTATE COMMISSION OF THE COMMONWEALTH OF
PENNSYLVANIA AND DEPARTMENT OF STATE (BUREAU
OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS) OF
THE COMMONWEALTH OF PENNSYLVANIA,

Respondents.

No.

NOTICE

You have been sued in court. You are hereby notified to file a written response to the enclosed Petition for Review within thirty (30) days from service hereof or a judgment may be entered against you.

BY: /s/ Joshua D. Wolson

Joshua D. Wolson
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1500 Market Street, Suite 3500E
Philadelphia, PA 19102
Counsel for Petitioners

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

SARA LADD, SAMANTHA HARRIS, AND POCONO
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PENNSYLVANIA AND DEPARTMENT OF STATE (BUREAU
OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS) OF
THE COMMONWEALTH OF PENNSYLVANIA,

Respondents.

**PETITION FOR REVIEW IN THE NATURE OF A COMPLAINT FOR
DECLARATORY AND INJUNCTIVE RELIEF**

INTRODUCTION

1. This civil-rights lawsuit seeks to vindicate Petitioner Sara (“Sally”) Ladd’s right to earn an honest living as a short-term vacation property manager in the Commonwealth of Pennsylvania. Sally is a 61-year-old entrepreneur who works from her home in New Jersey. She offered her services in Pennsylvania’s Pocono Mountains until the Pennsylvania Department of State informed her that she was under investigation for the unlicensed practice of real estate. This led Sally to discover that, in order to continue working, she would have to obtain a real-

estate broker's license, which would require spending three years working for an established Pennsylvania broker, passing two exams, and opening her own brick-and-mortar office in Pennsylvania. Unwilling to subject herself to these burdensome and unnecessary requirements, Sally began terminating her contracts with satisfied clients, including Petitioner Samantha Harris.

2. Forcing Sally to become a licensed real-estate broker merely to manage short-term¹ vacation rentals does not protect the public from any real danger, but rather serves only to protect traditional brokers from honest competition. That is unconstitutional: Under Article I, Section 1 of the Pennsylvania Constitution, Sally's right to pursue her chosen occupation cannot be burdened by arbitrary, irrational, and protectionist legislation. Because that is exactly what this regime does, Sally seeks a judgment declaring that, as applied to the niche work she does, Pennsylvania's real-estate licensing laws are unconstitutional and cannot be enforced against her and others similarly situated.

JURISDICTION

3. Petitioners bring this lawsuit pursuant to Article I, Section 1 of the Pennsylvania Constitution and the Commonwealth's Declaratory Judgments Act, 42 Pa. Cons. Stat. section 7532.

¹ "Short-term" rentals are rentals for periods of fewer than thirty days.

4. Petitioners seek declaratory and injunctive relief against enforcement of the Commonwealth's Real Estate Licensing and Registration Act ("RELRA"), 63 Pa. Cons. Stat. sections 455.101, *et seq.*; RELRA's implementing rules and regulations; and the practices and policies of the Pennsylvania Real Estate Commission and Pennsylvania Department of State (Bureau of Professional and Occupational Affairs); all of which impose an unconstitutional burden on Petitioner Sally Ladd's right to engage in her chosen occupation as a short-term vacation property manager, and on Petitioner Samantha Harris' right to avail herself of those services.

5. This Court has jurisdiction over this action pursuant to 42 Pa. Cons. Stat. section 761(a).

PARTIES

6. Petitioner Sally Ladd is an entrepreneur who provides short-term vacation property-management services in Pennsylvania's Pocono Mountains. Sally wishes to continue providing property-management services to her clients and interested others. She is a resident of Hampton, New Jersey.

7. Petitioner Samantha Harris is the owner of a vacation home in the Pocono Mountains and was, until recently, a client of Sally's. Samantha wishes to continue using Sally's property-management services to rent out her vacation home. She is a resident of Havertown, Pennsylvania.

8. Petitioner Pocono Mountain Vacation Properties, LLC (PMVP), is a New Jersey limited-liability company owned and operated exclusively by Petitioner Sally Ladd. Sally seeks to continue providing short-term vacation property-management services to her clients and interested others through PMVP. PMVP is based in Hampton, New Jersey.

9. Respondent Real Estate Commission of the Commonwealth of Pennsylvania (the “Commission”) is the Commonwealth agency responsible for enforcing RELRA. *See* 63 Pa. Cons. Stat. § 455.406(1). The Commission is located in Harrisburg, Pennsylvania.

10. Respondent Department of State (Bureau of Professional and Occupational Affairs) of the Commonwealth of Pennsylvania (the “Bureau”) is the Commonwealth agency responsible for overseeing the activities of the Commonwealth’s professional licensing boards and commissions, including those of the Commission. *See id.* § 2201. The Bureau is located in Harrisburg, Pennsylvania.

STATEMENT OF FACTS

Sally Ladd’s Property-Management Business

11. Sally Ladd is a 61-year-old entrepreneur who spent the majority of her career in the world of desktop publishing and marketing.

12. Sally was laid off in 2013 and has been mostly self-employed ever since, working primarily as a digital-marketing contractor building and maintaining websites.

13. Digital marketing is computer-based work that allows Sally to support herself by working mostly from home—something that is becoming increasingly valuable to her as she ages.

14. But since contract work is by definition temporary (i.e., contracts run only for finite terms), Sally wishes to balance that work with a more reliable source of supplementary income.

15. While Sally's primary residence is in Hampton, New Jersey, she also owns two small vacation homes in Pennsylvania's Pocono Mountains.

16. The first vacation home, which Sally calls the "Tranquility Cottage," is part of the Arrowhead Lake Community Association ("Arrowhead Lake"), located in Monroe County, Pennsylvania.

17. Sally started renting out the Tranquility Cottage to vacationers in 2009 as part of her broader vision to use it as an investment property into retirement.

18. The second vacation home, which Sally calls the "Serenity Cottage," is also part of Arrowhead Lake.

19. Sally started renting out the Serenity Cottage in 2013 in order to ease the financial burden of her then-recent layoff.

20. Through the process of renting out her two cottages, Sally discovered that she had an aptitude for managing vacation homes. Drawing on her experience as a digital marketer, Sally developed an online system that kept the cottages consistently booked whenever she was away.

21. By mid-2013, friends in the Arrowhead Lake community started noticing Sally's command of the process and asked if she would manage their properties, too. Excited at the opportunity to help her friends while earning some supplementary income, Sally accepted.

22. Later that year, Sally formed Pocono Mountain Vacation Properties, LLC (PMVP), a New Jersey corporation, to better coordinate her services.

23. Sally enjoyed property management and working through PMVP so much over the next few years that, by 2016, she was inspired to personally build and launch her own website (<http://PoconoMountainVacation.com/>) to better promote her services.

24. Sally runs PMVP almost exclusively from her home in Hampton. She works on her laptop and has no employees.

25. Through PMVP, Sally aims to take the hassle out of short-term vacation rentals by handling all of the marketing and logistics that property owners would otherwise have to coordinate themselves to keep their properties rented out.

26. Before providing services, Sally has each client sign a property-management contract that sets forth the essential terms of the arrangement, including the scope of the services Sally will provide and the obligations of the property owner in that arrangement.

27. Sally's services under these arrangements typically include, but are not limited to:

- a. Serving as an independent contractor only for the property owner, with complete exclusion from the contractual relationship between the owner and each renter;
- b. Marketing the owner's property on the Internet—chiefly, on platforms like her own website, Airbnb, HomeAway, FlipKey, and VRBO;
- c. Responding to all online inquiries and coordinating all bookings based on a pre-approved list of openings provided by the owner;
- d. Handling all billing, which can include accepting rental payments and security deposits, subtracting administrative costs and her own commissions, refunding security deposits, and remitting payments to the owners; and
- e. Facilitating cleanings of the property between renters.

28. Property owners' obligations under these arrangements typically include, but are not limited to:

- a. Providing Sally with a rental contract that will constitute the exclusive terms of the arrangement between the property owner and each renter;
- b. Providing Sally with a list of dates that she is allowed to book the property over the next twelve months, and acknowledging that dates not specifically reserved by the property owner upfront or submitted in writing at a later date are open for booking;
- c. Not double-booking the property and notifying Sally immediately if the property has been booked outside the scope of the arrangement;
- d. Working with Sally to establish rental rates with which the owner is comfortable;
- e. Certifying that the property complies with all applicable laws, regulations, codes, and homeowners' association rules;
- f. Paying any state or local sales tax imposed on short-term rentals, as well as any federal, state, and local taxes on rental proceeds;
- g. Maintaining short-term rental liability insurance for the property in a minimum amount of \$1,000,000;
- h. Providing Sally with a list of all house rules, instructions, and an inventory list for cleaners; and
- i. Providing household supplies and items in accordance with how the property was advertised.

29. Sally's services under these arrangements do not convey or facilitate the conveyance of any real estate, nor do they create or facilitate the creation of any landlord-tenant relationship.

30. Since starting PMVP, Sally has never bought or sold, or attempted to buy or sell, any real property on behalf of others.

31. Since starting PMVP, most of Sally's property-management services have involved instantly booking rentals for periods of just a few days at a time.

32. Since starting PMVP, most of Sally's property-management services have involved short-term rentals at rates of just a few hundred dollars at a time.

33. Since starting PMVP, Sally has never managed more than five clients' vacation properties at the same time, and has never managed any property outside of the Pocono Mountains.

34. Since discovering in 2015 that the Commonwealth's "hotel tax" applied to the short-term vacation rental of her cottages, Sally has also worked to make her clients aware that they, too, would be obligated to pay that tax. *See* 72 Pa. Cons. Stat. § 7210 (imposing "an excise tax of six per cent of the rent upon every occupancy of a room or rooms in a hotel in this Commonwealth, which tax shall be collected by the operator from the occupant"); *see also* 61 Pa. Code § 38.3 (defining "hotel" as any form of lodging "available to the public for periods of less than 30 days").

35. On information and belief, very few residential brokers in Pennsylvania focus on short-term vacation property management.
36. On information and belief, most residential brokers in Pennsylvania engage in complex, months- or years-long transactions involving the transfer of permanent or long-term interests in real property.
37. On information and belief, most residential brokers in Pennsylvania buy and sell houses worth tens or hundreds of thousands of dollars.
38. On information and belief, due to the longer-term nature of buying and selling homes, most residential brokers in Pennsylvania attempt to coordinate numerous complex transactions at once.
39. Because Sally focuses exclusively on short-term vacation property management and has never had more than just a few clients at PMVP at once, she has always prided herself on her ability to keep each client's property more consistently booked than would be possible if she were also focused on buying and selling houses.
40. Because Sally runs PMVP almost exclusively from home on her laptop, she has always prided herself on her ability to provide property-management services at a lower cost for her clients than would be possible if she had to pay for the overhead of a physical office and employees.

41. Sally’s clients—including Petitioner Samantha Harris—have appreciated Sally’s focus on short-term vacation property management and the resulting reliability and affordability of her services.

42. Since starting PMVP, Sally has come to love and cherish the work of owning and operating her own business. At 61, Sally now considers vacation property management an important part of who she is and the shape she hopes her life will take into old age. Sally also has high hopes that this work can continue to serve as a source of stable, home-based income to supplement social security once she retires.

Pennsylvania’s Real-Estate Licensing Regime

43. Pennsylvania licenses and regulates the practice of real estate within the Commonwealth. Those requirements are primarily set forth in its “Real Estate Licensing and Registration Act” (RELRA). 63 Pa. Cons. Stat. §§ 455.101, *et seq.*

44. RELRA defines a real-estate “broker” broadly to include any person who, for a fee, “negotiates with or aids any person in locating or obtaining for purchase, lease or an acquisition of interest in any real estate”; “negotiates the listing, sale, purchase, exchange, lease, time share and similarly designated interests, financing or option for any real estate”; **“manages any real estate”**; **“undertakes to promote the sale, exchange, purchase or rental of real estate”** (unless that person’s main business consists of “advertising, promotion, or public

relations”); or “attempts to perform any of the above acts.” *Id.* § 455.201 (emphasis added).

45. It is unlawful for a person to perform any work that falls under RELRA’s broad definition of a “broker” without first obtaining a license. *Id.* § 455.301.

46. To become licensed as a broker, applicants must satisfy multiple requirements that take years to complete. *See id.* § 455.511.

47. For instance, applicants must be at least 21 years old, graduate from high school or the equivalent thereof, and complete 240 hours of approved real-estate instruction. *Id.* § 455.511(1)-(3).

48. Applicants must also have “been engaged as a licensed real estate salesperson for at least three years or possess educational or experience qualifications which the commission deems to be the equivalent thereof.” *Id.* § 455.511(4).

49. RELRA defines a real-estate “salesperson” broadly to include any person “employed by a licensed real estate broker” to “list for sale”; “sell or offer for sale”; “buy or offer to buy or to negotiate the purchase or sale or exchange of real estate or to negotiate a loan on real estate or to lease or rent or offer to lease, rent or place for rent any real estate or collect or offer or attempt to collect rent”; “for or in behalf of such real estate broker.” *Id.* § 455.201.

50. Applicants must satisfy a number of requirements before a salesperson's license will be granted, including taking and passing a "salesperson license examination." *See id.* § 455.521.

51. In order to sit for that exam, applicants must be at least 18 years old and complete 60 hours of approved real-estate instruction. *Id.*

52. Applicants who pass that exam must then obtain the assent of a sponsoring broker and "submit a sworn statement by the broker with whom [they] desire[] to be affiliated certifying that the broker will actively supervise and train the applicant." *Id.* § 455.522(b).

53. Once issued, a salesperson's license is valid only for work under the applicant's sponsoring broker and cannot be used for work under any other broker. *Id.* § 455.603(a).

54. While working as a salesperson, an applicant is forbidden from accepting a commission or any valuable consideration from any person other than her sponsoring broker. *Id.*

55. If an applicant desires at any time to work for a different broker, she must first notify the Commission in writing, pay a fee, and return her salesperson's license. *Id.*

56. An applicant who returns her salesperson's license to work for a different broker must then obtain the assent of a new sponsoring broker, and will

receive a new license only upon the Commission's receipt of acknowledgment by that broker. *Id.*

57. Applicants who manage to accrue three years working as a salesperson for an established broker must then take and pass a "broker's license examination." *Id.* § 455.511. Those who pass are permitted—at long last—to apply to the Commission for a real-estate broker's license. *Id.* § 455.512.

58. A real-estate broker's license comes with additional duties that licensees must satisfy in order to retain their license. *See id.* § 455.601. Most notably, licensees must "maintain a fixed office within this Commonwealth." *Id.* § 455.601(a).

59. Failure to comply with RELRA brings heavy consequences. The unlicensed practice of real estate is a criminal offense punishable on the first conviction by a \$500 fine, imprisonment not exceeding three months, or both; and on the second conviction by a fine of up to \$5,000, imprisonment not exceeding two years, or both. *Id.* § 455.303. The Commission is also empowered to levy a civil penalty of up to \$1,000 against anyone who practices without a license. *Id.* § 455.305.

RELRA's Destructive Impact on Sally's Business

60. In January of 2017, Sally received a call from John Evanina of the Pennsylvania Department of State (Bureau of Professional and Occupational

Affairs), who informed Sally that she had been reported and was under investigation for the unlicensed practice of real estate.

61. This phone call led Sally to review RELRA and discover that her property-management services constituted the practice of real estate.

62. Shocked and upset, but wanting to avoid criminal and civil sanctions, Sally started researching what would be required to obtain a broker's license. She discovered that among other things, RELRA required that she spend three years working for an established broker, pass two exams, and set up her own brick-and-mortar office in Pennsylvania before she would be allowed to continue working there.

63. These requirements seemed excessive to Sally. In particular, she was appalled at the notion that her ability to continue running her modest business depended on whether she could obtain the permission of an established broker; she was appalled that she would be forced to spend three years of her life working for and sharing profits with a broker who either did not specialize in short-term vacation property management, or else would be a direct future competitor in that niche market; and she was appalled that she would be forced to set up a brick-and-mortar office in another state, where she had no desire to live, for work that she could do from home on her laptop.

64. Treating Sally like a traditional real-estate broker and requiring her to comply with the full panoply of RELRA's licensing requirements sweeps unnecessarily broadly and does not protect the health, safety, or welfare of the public.

65. Treating Sally like a traditional real-estate broker and requiring her to comply with the full panoply of RELRA's licensing requirements sweeps unnecessarily broadly and thereby imposes an undue burden on her ability to pursue her chosen occupation.

66. Treating Sally like a traditional real-estate broker and requiring her to comply with the full panoply of RELRA's licensing requirements sets up a "guild"-style system in Pennsylvania, whereby established brokers enjoy an effective veto over her ability to join the profession and, should they allow her to work as a salesperson, three years of control over her work and profits, which serves only to protect the financial interests of established brokers.

67. Unwilling to subject herself to such a regime, but fearful about the possibility of enforcement, Sally shut down her business.

68. With deep regret, Sally informed her clients that she could no longer continue managing their properties and began shutting down operations at PMVP (except as to her own cottages).

69. Sally's clients—including Petitioner Samantha Harris—were galled and disappointed to hear that they could no longer continue using her services.

70. Samantha, in particular, was frustrated that she would likely have to seek out the services of a licensed real-estate broker to keep her vacation home rented out. Based on her prior experience retaining real-estate brokers as property managers, Samantha felt that Sally would do a better job of marketing and renting out her vacation home.

71. As she predicted, Samantha has since been forced to retain the services of a licensed real-estate broker to manage her vacation home, and her vacation home has been less consistently rented out since. Samantha would prefer to continue using Sally.

Injury to Petitioners

72. As a direct result of RELRA, Petitioner Sally Ladd has been effectively prohibited from providing short-term vacation property-management services in Pennsylvania.

73. As a direct result of RELRA, Sally has been effectively forced to shut down operations at PMVP.

74. As a direct result of RELRA, Sally has been deprived of the stable, supplemental, home-based income that working as a property manager through PMVP provided and would have continued to provide into her retirement years.

75. But for RELRA, Sally would resume providing short-term vacation property-management services in Pennsylvania immediately.

76. But for RELRA, Sally would resume operating PMVP immediately.

77. But for RELRA, Sally would continue earning the stable, supplemental, home-based income that working as a property manager through PMVP provides and would continue to provide into her retirement years.

78. As a direct result of RELRA, Petitioner Samantha Harris is no longer able to continue using Sally—whom she knows and trusts—as her property manager. Instead, Samantha has been forced to retain the services of a licensed real-estate broker, and her vacation home has been less consistently rented out since.

79. But for RELRA, Samantha would immediately resume using Sally as her property manager, which would allow Samantha to continue benefitting from Sally's skill at marketing and renting out her vacation home, and bring her the peace of mind that comes with continuing to work with somebody she knows and trusts.

CONSTITUTIONAL VIOLATION

First Claim for Relief

(Article I, Section 1—Substantive Due Process)

80. Petitioners re-allege and incorporate by reference each and every allegation set forth in ¶¶ 1 through 79 of this complaint as though fully set forth herein.

81. Article I, Section 1 of the Pennsylvania Constitution protects Petitioner Sally Ladd’s right to pursue her chosen occupation free from arbitrary, irrational, and protectionist legislation, by declaring that “[a]ll men are born equally free and independent, and have certain inherent and inalienable rights, among which are those of enjoying and defending life and liberty, of acquiring, possessing and protecting property and reputation, and of pursuing their own happiness.” Pa. Const. art I, § 1.

82. The Pennsylvania Constitution also protects Petitioner Samantha Harris’ right to avail herself of Sally’s services under that same provision. *See id.*

83. As applied to short-term vacation property managers like Sally, RELRA does not bear a real and substantial relationship to the protection of the public health, safety, or welfare, and therefore violates Sally’s right to pursue a chosen occupation free from arbitrary, irrational, and protectionist legislation.

84. As applied to short-term vacation property managers like Sally, RELRA imposes an undue burden on Sally's ability to work as a property manager, and therefore violates her right to pursue a chosen occupation free from arbitrary, irrational, and protectionist legislation.

85. As applied to short-term vacation property managers like Sally, RELRA is a purely protectionist piece of legislation, and protectionism is not a legitimate basis under the Pennsylvania Constitution for depriving Sally of her right to pursue her chosen occupation. Nor is it a legitimate basis for depriving vacation home owners—like Petitioner Samantha Harris—from employing the people they choose to help rent out their properties.

86. Unless Respondents are enjoined from enforcing RELRA, Petitioners will suffer continuing and irreparable harm.

REQUEST FOR RELIEF

WHEREFORE, Petitioners respectfully request relief as follows:

1. For entry of judgment declaring that, as applied to Petitioner Sally Ladd, Pennsylvania's Real Estate Licensing and Registration Act, 63 Pa. Cons. Stat. sections 455.101, *et seq.*; RELRA's implementing rules and regulations; and the practices and policies of the Pennsylvania Real Estate Commission and Pennsylvania Department of State (Bureau of Professional and Occupational Affairs) impose unconstitutional burdens on her ability to work as a short-term

vacation property manager, and thereby violate Sally's right to pursue her chosen occupation under Article I, Section 1 of the Pennsylvania Constitution.

2. For entry of judgment declaring that those burdens also violate Petitioner Samantha Harris' right to avail herself of Sally's services under the same constitutional provision.

3. For entry of an order permanently enjoining Respondents from enforcing RELRA against Sally and others similarly-situated.

4. For an award of attorneys' fees, costs, and expenses in this action as the Court may deem just and proper.

5. For such further legal and equitable relief as the Court may deem just and proper.

Dated: July 17, 2017.

Respectfully submitted,

DILWORTH PAXSON LLP

By: /s/ Joshua D. Wolson

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INSTITUTE FOR JUSTICE

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*Not admitted in Pennsylvania, admitted in the State of North Carolina. *Pro hac vice* motion to be filed.

**Not admitted in Pennsylvania, admitted in the Commonwealth of Virginia. *Pro hac vice* motion to be filed.

CERTIFICATE OF SERVICE

I hereby certify that on this 18th of July I am serving the foregoing Petition for Review upon the persons and in the manner indicated below, which service satisfies the requirements of Pa.R.A.P. 121:

Service in person as follows:

Real Estate Commission of the Commonwealth of Pennsylvania

One Penn Center, 2601 N 3rd Street
Harrisburg, PA 17110
(Respondent)

Department of State (Bureau of Professional and Occupational Affairs) of the Commonwealth of Pennsylvania

Penn Center, 2601 N 3rd Street
Harrisburg, PA 17110
(Respondent)

Pennsylvania Office of Attorney General

16th Floor, Strawberry Square
Harrisburg, PA 17120

/s/ Joshua D. Wolson
Joshua D. Wolson
Counsel for Petitioners

VERIFICATION

I, Sara Ladd, hereby state:

1. I am a petitioner in this action;
2. I verify that the statements made in the foregoing Petition for Review are true and correct to the best of my knowledge, information, and belief; and
3. I understand that the statements in said Petition for Review are subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Signed: _____

Dated: _____


7/13/17

VERIFICATION

I, Samantha Harris, hereby state:

1. I am a petitioner in this action;
2. I verify that the statements made in the foregoing Petition for Review are true and correct to the best of my knowledge, information, and belief; and
3. I understand that the statements in said Petition for Review are subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Signed: 

Dated: 7/16/2017

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Ladd, Sara, et al., Petitioner v. Real Estate : New Case
Commission of the Commonwealth of Pennsylvania, :
et al. :

PROOF OF SERVICE

I hereby certify that this 17th day of July, 2017, I have served the attached document(s) to the persons on the date(s) and in the manner(s) stated below, which service satisfies the requirements of Pa.R.A.P. 121:

Service

Served: Attorney General
Service Method: eService
Service Date: 7/17/2017
Address: Strawberry Square
16th Floor
Harrisburg, PA 17120
Phone: (71-7) -787-3391

Served: Department of State (Bureau of Professional and Occupational Affairs)
Service Method: Personal Service
Third Party:
Service Date: 7/17/2017
Address: One Penn Center, 2601 N 3rd Street
Harrisburg, PA 17110
Phone: --
Representing: Respondent Department of State (Bureau of Professional and Occupational Affairs) of the Commonwe:

Served: Real Estate Commission of the Commonwealth of Pennsylvania
Service Method: Personal Service
Third Party:
Service Date: 7/17/2017
Address: One Penn Center, 2601 N. 3rd Street
Harrisburg, PA 17110
Phone: --
Representing: Respondent Real Estate Commission of the Commonwealth of Pennsylvania

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

/s/ Joshua D. Wolson

(Signature of Person Serving)

Person Serving: Wolson, Joshua D.
Attorney Registration No: 084998
Law Firm:
Address: Dilworth Paxson Llp
1500 Market St Ste E 3500
Philadelphia, PA 191022101
Representing: Petitioner Harris, Samantha
Petitioner Ladd, Sara
Petitioner Pocono Mountain Vacation Properties, LLC