

IN THE COURT OF COMMON PLEAS OF BUCKS COUNTY
CRIMINAL DIVISION

IN RE: : **MD 61-2009**
COUNTY INVESTIGATING GRAND :
JURY OF : March 12, 2009 : **GJ-14, C-12**

PRESENTMENT

TO THE HONORABLE ALAN M. RUBENSTEIN, SUPERVISING JUDGE:

We, the County Investigating Grand Jury of March 12, 2009, having fully utilized the resources made available to us through the Investigating Grand Jury Act, 42 Pa. C.S. section 4541 et seq, hereby complete our inquiry into the commission of criminal acts within the Bucks County Office of the Register of Wills, located at 55 East Court Street in Doylestown, Bucks County, Pennsylvania, and having obtained knowledge of such matters from witnesses sworn by the Court and testifying before us, and finding thereon reasonable grounds to believe, and so believing, that violations of the criminal law have occurred, upon our respective oaths, not fewer than twelve concurring, do hereby make this Presentment to the Court.

FOREPERSON

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FINDINGS AND ORDER

AND NOW, this day of , 2011, after having examined the Presentment of the County Investigating Grand Jury of March 12, 2009, C-12, which recommends the arrest of the following persons on the following enumerated charges:

BARBARA REILLY

Theft by Deception	8 Pa.C.S.§ 3922(a)(1) F3
Criminal Conspiracy	18 Pa.C.S.§ 903(a)(2)F3
Obstructing Administration of Law or Other Governmental Function	18 Pa.C.S.§ 5101 M2
Official Oppression	18 Pa.C.S.§ 5301(2) M2
Criminal Conspiracy	18 Pa.C.S.§ 903(a)(2) M2
Tampering With or Fabricating Physical Evidence	18 Pa.C.S.§ 4910(1) M2
Tampering with Records or Identification	18 Pa.C.S.§ 4104(a) M1
Tampering with Public Records or Information	18 Pa.C.S.§ 4911(a)(2) F3

REBECCA KEIFER

Theft by Deception	18 Pa.C.S.§ 3922(a)(1) F3
Criminal Conspiracy	18 Pa.C.S.§ 903(a)(2) F3
Theft By Failure to Make Required Disposition of Funds Received	18 Pa.C.S.§ 3921(a) M3
Criminal Conspiracy	18 Pa.C.S.§ 903(a)(2)M3
Obstructing Administration of Law or Other Governmental Function	18 Pa.C.S.§ 5101 M2
Criminal Conspiracy	18 Pa.C.S.§ 903(a)(2) M2
Official Oppression	18 Pa.C.S.§ 5301(2) M2

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Tampering with Records or Identification	18 Pa.C.S. § 4104(a) M1

CANDACE QUINN

Theft by Deception	18 Pa.C.S. § 3922(a)(1) F3
Criminal Conspiracy	18 Pa.C.S. § 903(a)(2) F3
Theft By Failure to Make Required Disposition of Funds Received	18 Pa.C.S. § 3921(a) M3
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Tampering with Records or Identification	18 Pa.C.S. § 4104(a) M1

JAMES MCCULLEN

Official Oppression	18 Pa.C.S. § 5301(2) M2
Criminal Conspiracy	8 Pa.C.S. § 903(a)(2) M2

The Court finds that said Presentment is within the authority of the Investigating Grand Jury and is otherwise in accordance with the provisions of the Grand Jury Act. In view of these findings, the Court hereby accepts the Presentment and refers this matter to the District Attorney of Bucks County for further action consistent with the Presentment.

BY THE COURT:

ALAN M. RUBENSTEIN
SUPERVISING JUDGE

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PRESENTMENT

We, the County Investigating Grand Jury of March 12, 2009, hereby complete our inquiry into the commission of criminal acts within the Bucks County Office of the Register of Wills, located at 55 East Court Street in Doylestown, Bucks County, Pennsylvania.

Having fully utilized the resources made available to us through the Investigating Grand Jury Act and having obtained knowledge of such circumstances sufficient to constitute reasonable grounds to believe that violations of the criminal law have occurred, we hereby recommend the arrest of the following persons on the following enumerated charges:

BARBARA REILLY

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SYNOPSIS OF THE INVESTIGATION

Our greatest President described the American republic established by our Constitution as a “government of the people, by the people and for the people.” Today, just as in 1863 when Abraham Lincoln first used those words, in this Commonwealth, government belongs to the governed, not to those who temporarily occupy elected office. Over many years, Barbara Reilly and the other persons against whom we recommend that charges be brought came to entirely ignore that great principle, treating the Bucks County Register of Wills Office as their own property. The office provided them and their friends with income for little work. It provided a source of political power for Reilly and her chosen allies. Their usurpation of the people’s property even extended to pilfering loose change and pocketing proceeds from the sale of forms which had been printed at county expense. Of greatest gravity under the criminal law, Reilly and her colleagues perpetuated her tenure as elected Register of Wills by requiring that office employees perform political work and then compensating them for that work with public tax dollars. Moreover, when they believed that discovery of their crimes was imminent, they engaged in the wholesale destruction of evidence.

The purpose of this investigation has been to hold those who have usurped the Register of Wills Office accountable for their criminal conduct and to return that elected Row Office to the people of Bucks County who are its rightful owners.

In March of 2010 Bucks County Controller Raymond McHugh assigned Investigator David Rouland to investigate complaints concerning alleged abuse of office and violations of county policy in the Bucks County Register of Wills Office. His investigation yielded evidence that over an undetermined period of years, employees of the Register of Wills Office had been directed by Barbara Reilly and her senior management staff to perform various political tasks – chiefly handing out literature at polling places on Primary and General Election Days , which are county work holidays. The employees would then report to a member of management the number of hours they had worked at the polls and a record would be made of that time “off-the-books”. Employees would later be allowed to take time off with pay to “compensate” them for these political activities which had nothing to do with the proper responsibilities of the Register of Wills Office or the Orphans’ Court.

On the basis of the information reported to him by Rouland, Controller McHugh, himself a lawyer, concluded that some of the activities unearthed by his investigation went beyond violations of county policy and involved potential violations of the Pennsylvania Crimes Code. Accordingly on or about July 20, 2010, the Controller’s Office shared with the Bucks County District Attorney’s Office the results of the Rouland investigation.

Based upon this information, the District Attorney’s Office began its own investigation before the current investigating grand jury. A Notice of Submission of Investigation was filed on July 27, 2010, and testimony began on July 29, 2010. The investigation took almost eight months to complete. In addition to hearing testimony from 35 witnesses, some of whom testified more than once, the grand jury authorized

numerous subpoenas for the contents of computers, emails, and telephone records pertaining to the management of the Register of Wills Office.

Both former and current employees of the Register of Wills were interviewed by the Bucks County Detectives and were called to testify before the investigating grand jury. A clear picture of an office run by intimidation and deception gradually emerged. In addition, the evidence depicted an office in which politics were the chief motivating factor for management decisions. This political involvement ran the gamut from political work performed on county time to employees being forced to do political work such as working the polls for elections and knocking on doors to distribute candidates' literature and register potential voters. Some employees put up and took down political signs for various elections. Reilly and her managers demanded political activity from their employees and these employees were illegally

compensated for much of it with taxpayers' money. With the exception of the individuals who are the targets in this case, no former or current employee who was interviewed and testified denied the availability of the off-the-books" comp time for doing political work such as working the polls. It is unclear when this practice began. Reilly has been in office since 1976. Every former and current employee testified that this practice was already in place when they joined the office under Reilly.

This practice of illegally paying employees for doing political work was able to continue for so long because of the people Reilly put in place to help run her office. She was able to create an environment where employees were afraid to speak up against these activities for fear of retaliation and losing their jobs. Evidence established that these fears were not without basis. Employees were able to see firsthand what happened to employees who displeased management or, in one case, who was a potential political competitor. They saw the systematic practice of removing all authority from such employees. Some received a barrage of constant humiliation and degradation until the employee would either leave on her own or be forced out through threat of disciplinary action. This practice was perfected under the leadership of Reilly, Second Deputy Rebecca Keifer, trusted administrator Candace Quinn, and perpetuated by the complacency of First Deputy James McCullen.

Evidence showed that the Bucks County Register of Wills Office experienced an unusually high turnover of employees. Even though the grand jury heard from a number of former employees of the office, that turnover and the passage of time has made it very difficult to prove what happened over many of the 35 years during which Reilly held the Register of Wills Office. Accordingly, the grand jury has recommended charges against some of those who have most recently led the office under Reilly, not because other earlier administrators may not also have been culpable but rather because the passage of time, loss of evidence and memory have rendered successful investigation unfeasible. Similarly, by painstaking investigation of surviving records and careful review of testimony, County Detectives have assembled evidence proving theft of comp time valued at \$6,533.27. However, all of the evidence in this case shows that the total loss to Bucks County attributable to this conduct, while it cannot now be proven with precision, was vastly greater even if one assumes that such thefts occurred during only a portion of Reilly's 35 year tenure and extended only to some of her employees.

As to those against whom presentments are recommended, Reilly has acknowledged that she has spent her career in elected office. She served eight years as the Tax Collector of Bensalem prior to running for the Register of Wills in 1975. In her 35 years as the Register of Wills, Reilly created an environment of absolute management control and influence stretching beyond the workday and the workplace. This

control was used to deliver workers, some willing and others not, to support Republican candidates. This in turn enhanced Reilly's ability to gain endorsements and political influence, term after term.

Reilly has been able to accomplish this while keeping her illegal and criminal activities secret from everyone outside of the Register of Wills – until now. The granting of “off-the-books” comp time first came to light during the audit of the Register of Wills Office conducted by the Controller's Office in 1998. That audit uncovered the fact that comp time for Register of Wills' employees was being kept “off-the-books”. This was a practice that had not been permitted in Bucks County since 1991. In addition, it was discovered that this comp time was given without recorded explanation or other documentation.

As an independently elected official, Reilly was able to explain this practice on the basis of the various legitimate events and activities attended by her staff which occurred away from the courthouse and outside of regular business hours. In 1998 Reilly was advised that this practice must stop immediately. But it did not. At the end of the 1998 audit, the Controller's Office presented audit findings requiring documentation of all comp time awarded to members of the Register of Wills' staff. These findings were presented directly and personally to Reilly, Keifer and McCullen.

Nevertheless, when in 2001 the Controller's Office began a second audit, they discovered the same practices.¹ Reilly was still permitting off-the-books comp time with no explanation. She was told again that this was impermissible. Reilly assured Raymond McHugh, the Controller at that time, that the comp time was for legitimate work, and specific credits for particular employees were then placed “on-the-books” by McHugh based upon her representations. In both instances, no member of the Controller's Office was aware that the employees of the Register of Wills were receiving this comp time for political work.

Evidence showed that Reilly was involved with every significant decision that was made in her office. Although her physical attendance in the office waned during the last few years, evidence showed that she was constantly in communication with the people running the office – for many years Keifer, Quinn, and presently Sheila Bass. Evidence showed that Reilly was present for conversations about giving employees illegal comp time. In addition, she was present via speakerphone for many meetings which took place with employees and supervisors about this investigation.

Keifer began her employment at the Register of Wills Office in 1985 as a marriage clerk. She quickly became Reilly's right-hand person. She was highly involved in the day-to-day operations in the office. In Keifer's own words, she never made one decision about the office without Reilly's approval.

Quinn began her employment at the Register of Wills Office approximately eighteen years ago.

In addition to the more serious corruption involved with the use of taxpayers' money to fund political activity, the arrogance of the targets of this investigation is also demonstrated by the more mundane thievery in which they engaged. Numerous witnesses testified that members of the public having business with the Register's office made use of a copying machine which was funded by county tax dollars and made available to the public in the office for the purpose of making copies of the records kept therein. One dollar per page was charged for copies made by office personnel. Twenty-five cents per

¹ In 2001, the Controller's Office was unable to officially conclude their second audit due to financial constraints unrelated to the findings of the audit.

page was charged to those – principally lawyers and title searchers – who made their own copies. When a receipt was requested, these payments – mostly in cash – would be processed through a cash register belonging to the office and monitored by the Controller’s Office. The sums thus collected and documented would be deposited monthly into the appropriate county bank account. However, frequently money for copies would simply be left on the counter or placed in a receptacle provided for that purpose. These monies do not appear to have been deposited in any county account. Rather office employees, for the period in question primarily Kiefer and Quinn, would remove sums which they would use to buy sodas, lunch and the like for themselves. Various witnesses testified that at one point the change container was regularly emptied into Quinn’s desk drawer. This investigation appears to have put a stop to the use of a separate change receptacle on the Register of Wills counter. Since that time, it appears that deposits of copying fees into the proper county account have increased substantially.

Similarly, over the years Reilly has caused the county print shop to print up fairly elaborate blank forms to be filled in by Bucks County residents to assist them in recording their “family tree”. On some occasions of public contact such as senior citizens fairs, the annual Middletown Grange Fair and the like, testimony indicated that these forms were given away as a courtesy. Some witnesses testified, however, that on various occasions over the years a fee of one dollar each was charged to those citizens wishing to obtain these forms. Records of the county reflect no deposit of funds deriving from the sale of these “family tree” forms. Witnesses testified that on some occasions these proceeds were taken by one or more members of the Register’s staff for their own use.

Remarkably, the targets’ most blatant abuse of powers came to light after they had notice that the Controller’s investigation into the Register of Wills Office had begun. The investigating grand jury heard overwhelming evidence that hundreds, if not thousands, of documents were shredded. Evidence demonstrated that this was done in contravention of established county policy and for the explicit purpose of thwarting any possible future criminal investigation. These documents included salary records of original entry by which employees authorized to receive taxpayer funds for doing political work could have been identified. In addition, employees continued to be intimidated by Reilly, Keifer and Quinn who interrogated them about what these employees would say to investigators. Reilly even went so far as to speak to some of the employees over the telephone on the night before they testified before this investigating grand jury.

McCullen, who has been the First Deputy of the Register of Wills since 1988, was never really part of Reilly’s inner circle in the office. This investigating grand jury heard voluminous testimony regarding McCullen’s role in the office. It is clear from the evidence that he is very connected politically to the Republican Party of Bucks County and that these connections led to his employment with the Register’s Office. The testimony regarding McCullen painted a clear picture of a man who was not involved in the day-to-day operations in the Register of Wills. Rather, McCullen spent substantial time during work hours at Republican Headquarters.

While McCullen does not appear to have played a strong role in implementing the illegal practices that took place within the Register of Wills, there is also little doubt that McCullen knew about the illegal activities that were going on in the office of which he was nominally second in command and that he did nothing to stop them. Rather, he kept the conspiracy strong by making sure that employees knew that it was “their obligation” to do political work and work the polls at election because they “owed it to Barbara.”

The record reflects that of the 35 witnesses who testified, some denied the existence of some facts which would support criminal prosecution. Others, including several of the targets, repeatedly invoked their rights against self incrimination under the Fifth Amendment of the United States Constitution. Other witnesses initially testified before the grand jury in ways which denied the existence of facts supporting criminality until they were confronted with specific evidence contradicting their assertions. In these cases, several of them then abandoned their previous denials and acknowledged the existence of facts supporting the conclusion that criminal conduct had occurred in their presence and/or to their knowledge. During the course of taking testimony, the grand jurors exercised their roles as finders of fact, making determinations as to the credibility or lack thereof of each witness who testified. To the extent that charging each of the targets herein with the crimes set forth herein contradicts the testimony of some witnesses, the Court and any subsequent reader should recognize that this grand jury has made credibility determinations which support our findings that each of the criminal charges recommended herein rest upon a sound factual basis and that the grand jury has deemed contradictory testimony not to be credible.

The charges which the evidence received by the grand jury supports in this matter may best be understood in the context of the several conspiracies which we find were carried into action by the following named persons acting in various combinations. We find that the fundamental and overarching conspiracy in which Barbara Reilly, Rebecca Keifer, Candace Quinn and James McCullen participated was Conspiracy to Commit Official Oppression. The evidence proves that each individual in his or her own right and all in agreement with each other acted in their official capacity and knowing that their conduct was illegal to deny or impede a great many employees of the Register of Wills Office in the exercise or enjoyment of their right to political affiliation and/or activity. Simply put, employment in the Register of Wills Office involved the loss of the freedom to choose one's political party or affiliation. Instead, such employment required the employee to engage in substantial political campaign activities, whatever the employee's actual political beliefs, motivations or inclination to be politically active were.

The evidence demonstrates the existence of a second conspiracy between Reilly, Keifer and Quinn. The objective of that conspiracy, which was successfully repeated time and again, was the theft of the taxpayers' dollars by deception every time a Register of Wills employee received compensatory time, which of course had substantial pecuniary value. Given the cumulative value of the thefts accomplished by this scheme, the Thefts by Deception committed by each of the three co-conspirators are felonies of the third degree.

By virtue of their participation in the conspiracy to commit Official Oppression, each of the four co-conspirators is responsible for the criminal acts of any one or more of their co-conspirators which were committed in furtherance of the objectives of the conspiracy. Similarly, by virtue of their participation in the conspiracy to steal the public's money by means of the comp time scheme, Reilly, Keifer and Quinn are each responsible for any crimes committed by any of the others in furtherance of that conspiracy. Acts in furtherance of a conspiracy include attempts to prevent or avoid arrest or conviction.

The evidence demonstrates that participants in the overall theft conspiracy committed two separate and distinct actions aimed at destroying evidence and thus preventing prosecution. The first such action was taken by Candace Quinn who destroyed a so-called "pink book" –actually a blue notebook binder with pink pages – which contained records of illicit "off-the-books" comp time. The investigation has not produced conclusive evidence that anyone entered in advance into a specific agreement with Quinn that the "pink book" should be destroyed. Thus, it is recommended that Candace Quinn be charged with

Obstructing the Administration of Law or Other Government Function for destroying the “pink book” as well as with Tampering with Records or Identification for the destruction of the “pink book”. It is also recommended that Reilly and Keifer be charged with those crimes in connection with the destruction of the “pink book” because that act was committed by their co-conspirator Quinn in furtherance of the Theft conspiracy.

The second major act involving the destruction of evidence was the so-called “shredding party” which took place in the office of the Register of Wills in May of 2010. The evidence demonstrates that Keifer and Quinn each participated in the actual shredding of evidence and thus had plainly entered into an agreement to do so, rendering them conspirators with each other in this undertaking. Accordingly, each committed the crime of Obstructing Administration of Law or Other Government Function and Conspiracy to commit that offense with regard to the shredding of payroll records.

Both Keifer and Quinn are also subject to prosecution for Tampering with or Fabricating Physical Evidence and Conspiracy to commit that crime by virtue of their shredding of the payroll and similar records. While the available evidence does not prove that Barbara Reilly was a party to the conspiracy to shred records, she is responsible for the actions of her Theft co-conspirators and is thus chargeable as a principal for Tampering with or Fabricating Physical Evidence as a result of her co-conspirators’ shredding of documents. Additionally, Reilly acted on her own, using her authority as an elected official to dishonestly validate the previously “off-the-books” comp time after the attempted 2001 audit.

By presenting numerous hours of previously undocumented comp time to County Controller McHugh and representing those hours to have been legitimately awarded for work properly associated with the public functions of the office, she Tampered with Public Records or Identification. In this instance she alone was responsible for this conduct.

The evidence available does not demonstrate Reilly’s complicity in the Theft of money from the “change box” or diversion of money received from the sale of “family trees”. The evidence does support charging Keifer and Quinn each with Theft by Failure to Make Required Disposition of Funds Received in connection with the “change box” and/or the “family tree” receipts as well as Conspiracy with each other to commit those Thefts.

II. SUMMARY OF THE TESTIMONY

We, the County Investigating Grand Jury of March 12, 2009, were summoned pursuant to the Act of November 22, 1978, Act number 271, as amended by the Act of July 24, 1979, Act number 50, 42 Pa.C.S.section 4541-4553. We were duly charged by the Court to investigate allegations of crimes occurring within the County of Bucks. Since July 27, 2010, we have investigated the commission of criminal acts within the Bucks County Office of the Register of Wills, located at 55 East Court Street in Doylestown, Bucks County, Pennsylvania, and we have found violations of the Crimes Code of the Commonwealth of Pennsylvania.

Testimony of Kim Doran

Kim Doran testified that she is the Deputy Clerk at the Controller’s Office in Bucks County and that she works directly for Raymond McHugh, who is the elected Controller. She has worked for the Controller’s Office for the past 20 years and has been Deputy Controller since 1992. She is a graduate of Rider

College and a Certified Public Accountant. She worked for a private accounting firm before coming to work at the Controller's Office.

She testified that the Controller has numerous functions established by law. These include administering payroll for the 2,500 Bucks County employees and seeing to payment of invoices and other contractual payments. The Controller's Office is also responsible for administering County pensions and in that capacity pays approximately 1,000 retirees on a monthly basis. The Controller's Office also periodically audits the row offices, local tax collectors, Magisterial District Courts and other County offices. Some of these audits are required by law to be conducted at particular intervals. Others occur as the resources of the Controller's Office permit.

The accounting section of the Controller's Office is responsible for putting together the County's annual financial report. The Controller's Office is, in turn, audited by outside auditors hired by the County Commissioners to audit the books and records which they maintain so as to make sure the County is recording things correctly.

Doran also described that there are two systems for paying employees – hourly and annually. Her testimony on this point was as follows: Hourly employees get paid for the hours they actually work at a set rate of pay, typically determined by contract. If an hourly employee works eight hours, she gets paid for eight hours. If she works six hours and does not have any sick, vacation or compensatory (.comp.) time, then she gets paid for six hours. An employee who receives a fixed annual salary is also known as an exempt employee. Such a salaried employee gets paid whether she works twelve hours in a day or six hours in a day. A salaried employee's pay is divided into 26 pay periods. Salaried employees do not receive pay for overtime or comp time. If such an exempt employee leaves work early, she still receives her full day's salary unless her department policy requires another arrangement, such as the use of vacation time for the remainder of the day. Both sick time and vacation time are accrued at regular intervals and are recorded on the employee's paystub. Comp time is also recorded on the stub.

Doran testified that each department is responsible for maintaining its own payroll records. There is an authorized signer for each department who completes a weekly timesheet, sends it to the Controller's Office and certifies at the bottom that it is true and correct. On that sheet, if a person had worked comp time, that time would be entered with a notation "CS" for comp straight time or "CO" for comp overtime. This information would now be entered into the Lawson System, which is an integrated computer business record system. The term "Comp straight time" means that the employee is entitled either to take one hour off for each hour reported or to be paid one hour's pay. "Comp overtime" means that the employee would be entitled to one and one-half hours off or to receive equivalent pay for each "CO. hour reported.

Doran testified that departments are not required to enter explanations for the comp time reported to the Controller's Office. There is no county policy defining the purposes or circumstances under which comp time can be awarded. However, there are purposes for which comp time cannot be used. Comp time cannot be awarded for any activity which is not related to the official duties of the county office employing the individual receiving comp time. The award of comp time for doing political work, working election polls, or doing personal work for the Row Officer is prohibited. When an employee elects to use comp time, her pay stub would reflect a number of hours "CU."

Doran further testified that no office in the county, including the Register of Wills, is allowed to award comp time "off-the-books". In 1990, the county issued a directive saying that comp time will no longer be allowed to be kept "off-the-books". At that time, anyone having "off-the-books" comp time was required to reconcile it and report all such time to the Controller's Office. This new directive required that thereafter all comp time be recorded "on-the-books."

Doran testified that the Controller's Office is authorized by statute to audit any county-related department. Such departments also include all tax collectors who collect county taxes and magisterial district courts. State-funded systems like the 911 system are audited tri-annually. Other departments are audited periodically, or in any case in which an irregularity is brought to the Controller's attention. There is no set requirement that the Register of Wills Office be audited at any particular interval. The last full audit for that office was conducted in 1998.

Doran testified that when an audit is performed, the Controller's Office makes sure that the departments are in compliance with county rules and regulations, and that they have proper internal controls which meet applicable audit standards. For example, the same person would not be permitted to write checks, sign checks, deposit checks, and reconcile the bank records. Rather, a system of dividing responsibilities among two or more employees would be required. A Controller's audit also requires that each department account for county assets such as computers, furniture or other items of value which have been issued to it.

Doran testified that in addition to full audits, the Controller's Office also checks change-making funds of the District Courts and Row Offices annually. A change fund is typically \$100 or \$200 which is kept in an office's cash register for the day. The Controller's Office performs "surprise audits" of such funds. The Controller notifies the department head by letter that they will be coming in to perform the audit. In the past, the letter was given the night before or the morning of the audit. A letter from 2008 to the Register of Wills was presented and admitted as Grand Jury 14, C-12, exhibit number 60. This letter would have been handed to Barbara Reilly or to whoever was in charge of the office that day. When the audit of the change fund was performed, the department would turn over to the auditor the change fund on which a reconciliation was to be performed. These procedures gave the department the ability to hide any unauthorized "change box" in advance of an audit.

Grand Jury 14, C-12, exhibit number 23 was identified by Doran as the 1998 report of a complete audit performed by the Controller's Office on the Register of Wills Office covering the years 1992-1997. In that report, under payroll analysis, there was a finding that "off-the-books" comp time was still being kept internally on a spreadsheet, instead of being coded properly on time sheets and that there was no justification given as to how the recorded comp time had been earned. This "off-the-books" approach was in violation of the county policy established in 1990. An exit conference was conducted at which Doran, Denise Rimby and Julie Burns of the Controller's Office met with Barbara Reilly, James McCullen, Sandy Pappert and Rebecca Kiefer of the Register of Wills Office. Reilly was also sent a copy of the report.

Doran explained that an exit conference is a meeting at which auditors and responsible Row Office employees get together to address any questions departments have about the findings of the audit. The Row Office is then given the opportunity to respond in writing. This response is incorporated in the audit report. The Controller in 1998 was Rea Boylan Thomas. A copy of her audit report was sent to Auditor General Robert Casey pursuant to applicable law.

Doran was shown Grand Jury 14, C-12, exhibit number 57 (Attached herein as "Exhibit A" and incorporated hereto), which was a memo from Barbara Reilly to Linda Wilson, who was the payroll supervisor in the Controller's Office at the time. This memo, dated May 13, 2002, listed all Register of Wills employees who had purportedly earned comp time but whose time had not been entered "on-the-books" as of that date. This memo was in response to a partial audit which was performed by the Controller in 2002. That audit again disclosed a continuation of the same practices involving undocumented comp time.

Doran also testified that in preparation for audits, the Register of Wills Office was required to produce underlying documentation for expenditures made by the Controller's Office at the Register's directive. These would include originals of invoices, time sheets, sign-in sheets and time-off request sheets. Before the Lawson reporting system, the originals of these documents were sent to the Controller's Office, and the copies of those originals were maintained by the Register of Wills Office. Ms. Doran also testified that if an audit were to be done today and no time sheets or time-off request forms were produced, it would be problematic because there would be no documentation to substantiate the information placed in the Lawson system for time-off, sick, vacation or comp time earned or used. She testified that, were the Controller's Office to go into any office to conduct an audit and not find such financial documentation justifying expenditure of County funds, all such unsupported expenditures would be disclaimed and the fact that the office was unable to prove the legitimacy of these payments would be reported to the County Commissioners, the Auditor General, and the Register of Wills.

Doran testified that on June 7, 2002, the employees listed in the Register of Wills memo had additional comp time consistent with the memo entered in the payroll records maintained by the Controller's Office. Other legitimate comp time had been reported and was on the

Controller's books, but no justification for the additional comp time set forth in Barbara Reilly's memo was ever provided. This previously "off-the-books" comp time became "legitimate" when Reilly, an elected department head, signed off on it, thus reporting that it had been legitimately earned.

Doran was also shown Grand Jury 14, C-12, exhibit number 58 (Attached herein as "Exhibit B" and incorporated hereto). Exhibit 58 lists the amounts collected by the Register of Wills for copying services, stated monthly. She testified that such receipts are required to be rung up separately from other fees collected at the Register's counter. These fees were to be deposited in the cash register. At the end of each month, the Register of Wills was required to send the Controller's Office a report reflecting the copy fees collected. A check in the indicated amount payable to the County was to be forwarded with the monthly report. This money was not to be kept as petty cash because the county already provided a separate petty cash fund. According to county rules, any money collected for copies was to be deposited in the register under key 140 and was not to be placed in a separate coin box. Doran stated that if this money was not reported or deposited, but rather kept in an unreported slush fund, that constituted stealing from the county.

Doran testified that the amount of money for copies deposited monthly since July of 2010 has increased significantly from earlier monthly averages. For example, in January 2010, \$1,069.25 was collected, while in August 2010, that amount increased to \$1,842.00. She noted that she is not aware of any increase in the price of making copies charged by the county this year.

Doran testified that there is no specific penalty for a bad audit. Audits are, however, matters of record and any reflection of waste or bad management has the potential of becoming a political embarrassment to the responsible elected officer. Obviously, if an audit disclosed apparent theft, that is reported to the District Attorney's Office. She also testified that comp time, once awarded, remains "on-the-books" until an employee leaves, and if a retiring employee has not used that time, she is paid the wage equivalent.

Doran testified that she worked on the Register of Wills matter with Investigator David Rouland from the Controller's Office who was in charge of the investigation from their end. When he made his findings, she, along with Raymond McHugh, made the decision to bring this matter to the attention of the District Attorney's Office.

Testimony of Raymond McHugh

Raymond McHugh is the elected Controller of Bucks County. He testified that he has held this office since his appointment in 2000 and subsequent election in 2001. He testified that his current term expires in 2013. He testified that the Controller is the Chief Financial Officer of the county. He explained that the office of the Controller has a number of responsibilities, including paying the county's bills, paying the county employee payroll, administering the pension fund for retired county employees, and completing the accounting functions for the county. He testified that the Controller's Office audits those who collect or deal with money for the county. He further explained that there are a number of checks and balances within the system. He said that the Treasurer must sign county checks, but the Controller issues them. He said that in addition to this, that the Controller's Office is audited every year by an outside auditing firm chosen by the County Commissioners.

McHugh testified that his office oversees all county authorities who deal with county money, including the row offices. He explained that row offices do not answer to the courts or to the commissioners and they can set their own internal rules and procedures. He testified that row officers are not necessarily bound by county human resources policy. He explained that row offices can have their own bank accounts, but the bank accounts are audited by the Controller's Office. He testified that once the row offices deal in money, then they are bound by certain county rules. He explained that, for example, maximum and minimum salaries are set by county law, but that the row officers can increase or decrease pay without anybody's approval so long as they stay within their budget. He testified that the work that row offices pay for must be work that is related to that particular row office function, which is established by law.

McHugh testified that the Controller's Office has the ability to refuse payment for work which it does not believe is appropriate based on certain legal guidelines. He testified that he is familiar with Barbara Reilly and her position as Register of Wills. He explained that the Controller's Office would not approve payment for her paying her employees to work the polls on a county holiday, including primary election day and general election day. He testified that county employees are not paid to engage in partisan political activities.

McHugh explained that the county has different sources of revenue. He testified that the main source is the general fund and that the general fund is derived primarily from taxes. McHugh explained compensatory time, also called comp time. He said that there are guidelines for using comp time. He explained that in order to earn comp time, the employee must perform work which is directly related to the lawful duties of the office which employs her. He also testified that comp time is not given to all types

of employees. McHugh testified to the way in which employees receive comp time. He explained that in each office, someone is responsible for recording the time that each employee worked on a daily and weekly basis. He indicated that when this person hands in their department payroll, this person certifies to the best of their knowledge that these employees worked the hours shown for a given date. He said that those records of employment are forwarded to the Controller's Office and are reviewed by the

Controller's Office payroll department. He testified that so long as the time is within the normal allotments, then it would be processed.

McHugh explained that comp time is regularly maintained and documented through the county records system. He said that comp time also appears on employee paychecks. He acknowledged that since 1991, it is not allowable for any row office to keep a record of comp time "off-the-books" or outside of the county system. He said that since 1991, all employee compensation needed to be documented through the Controller's Office and that there should be no such thing as any "off-the-book" comp time. He acknowledged that generally when departments submit their comp time, they do not necessarily have to defend it. Normally, the Controller's Office accepts the certification of the row office's payroll person.

McHugh testified about the Controller's auditing of county departments. He explained that there are legal requirements that some departments be audited at least every other year by the Controller. He explained that row offices are not required to be audited on any schedule. He said that the auditing of a row office is discretionary and the Controller audits if he hears of a problem. He explained that the last completed audit of the Register of Wills was in 1998. He indicated that he was familiar with that audit. He explained that he was aware that the 1998 audit indicated that there were issues regarding comp time or "off-the-book" comp time being used in the Register of Wills Office. He said that after an audit is completed, there is a meeting that is held after the report is generated. At the post-audit review, McHugh explained that the issues or concerns raised by the audit are brought up with the audited office. McHugh testified that there was a post-audit review with the Register of Wills in 1998.

McHugh testified that there was another audit of the Register of Wills attempted in 2001. He explained that the 1998 audit revealed that Register of Wills employees were using "off-the-book" comp time with no explanation. He testified that he reviewed the recommendations in the 1998 audit and in the attempted audit of 2001 and "off-the-books" compensation was still an issue. He said at that time, the issue of Register of Wills employees being given comp time to work the polls was not disclosed. He testified that in 2001, Reilly explained the comp time issue by saying that employees were working senior fairs or other education events and were doing so outside of normal working hours.

McHugh explained that the inquiry into the comp time began when he sent an auditor to the Register of Wills in 2001. He said that someone from the Register of Wills told the auditor that they had comp time, but a check of their paystubs did not reflect that the employee had earned any comp time. He said that the Register of Wills was told that there was no such thing as "off-the-books" comp time in 2001. McHugh testified that the audit was never completed. McHugh recalled that Reilly confronted him at a social event about the use of comp time and asked him if he was disallowing the use of comp time. He indicated that Reilly felt as if he was singling out her office and that she felt that people were not getting the comp time that they deserved.

McHugh testified that after that conversation with Reilly at the social event, he personally told her that the comp time they were using was not recorded through the system. He said that he explained to her at that

time that there is no such thing as "off-the-books" comp time. He told her that "we have not recognized it and we will not recognize it." He testified that Reilly gave an explanation that her employees had earned the comp time by working senior citizen fairs. He testified that she said that when she started as the Register of Wills, prior to 1991, the comp time was just kept in their office and that everybody kept their own books. He testified that he explained to her that "everybody is the same" and "you're not being singled out" and that all comp time has to be "on-the-books". McHugh testified that he then gave Reilly the option of sending him a list of people who she believed earned comp time, to be put "on-the-books" and to end the "off-the-books" comp time. McHugh testified that Reilly assured him repeatedly that this comp time was for work consistent with the legal duties of the Register of Wills. He testified that at that time there was never a mention of any employee being compensated for working the polls or for any political activity. McHugh testified that if he had heard in 2001 that comp time was being used for political activity, he would have looked into it and would have conducted an investigation. He explained that it is not feasible for the Controller's Office to investigate or "micromanage" every row officer who indicated that employees are getting comp time for legitimate purposes.

McHugh identified Grand Jury 14, C-12, exhibit number 57 (See "Exhibit A"), a memorandum sent by Reilly to the Controller's office in response to their conversation about individuals in her office accruing comp time. McHugh testified that the memo from Reilly was addressed to the Controller's payroll supervisor and it listed several employees' names and their accumulated comp time. McHugh testified that it was his understanding that this comp time had been "off-the-books" prior to May 13, 2002, the date of the memo. McHugh indicated that the audit of the Register of Wills was not completed in 2001 because the Controller's Office was waiting for a computer system that would allow them to independently review payroll. McHugh testified that when they got the computer system in 2009, payroll was one of the first things that they checked. McHugh explained that after his conversation with Reilly about the comp time, he believed Reilly's assertion that all of the comp time had been legitimately earned and that all of the comp time was now being kept in the computer system and there was no more "off-the-book" comp time. He testified that he went out to senior citizen fairs and saw for himself that Register of Wills employees were working.

McHugh testified that in 2010, he hired David Rouland to investigate the Register of Wills. He explained that he decided to begin an investigation because he had received complaints from other row offices that Register of Wills employees were working the polls and getting paid for it through county funds. He explained that it is absolutely against county policy for an employee to work the polls and get paid for it through county funds. He testified that he also received complaints from employees within the Register of Wills office. He said that there were two Register of Wills employees who came to him said that there are people "stealing" and "this place is out of control." He indicated that these employees told him that Kiefer, Quinn, and Reilly all knew about this. McHugh testified that the Register of Wills collected coins for copies made in their office. He explained that all of that money belonged to the county and that it is used to defray the costs of copier paper and supplies. He testified that a row officer must turn in the money for copies to the county and that it would be a violation for them not to turn the money in.

McHugh testified that after hearing the complaints of the two Register of Wills' employees, he spoke with James McCullen in the early months of 2010. He indicated that the employees told him that McCullen was "cut out of everything" and was not involved in the day-to-day operation of the office. McHugh testified about his meeting with McCullen. He said that McCullen was initially stunned by some of the allegations. He testified that McCullen told him that he did not really deal with "the girls." He testified that

McCullen initially said to him that he was putting him (McCullen) in a bad position and that he will get fired immediately by Reilly. McHugh recalled that the Register of Wills' employees told him that they were collecting money in a box and taking it. He said that these employees told him that when the Controller's Office came to do an audit, they were told to take the box and put it in the safe. McHugh asked

McCullen about the stealing of this money and McCullen said that it would not surprise him, but that he never saw it.

McHugh explained that Rouland investigated the Register of Wills and made findings in the way of a report. McHugh testified that after receiving the report from Rouland, it became apparent that there was some criminal activity or at least potential criminal activity. McHugh testified that they then went to the District Attorney with their findings. McHugh testified that his investigation ended when the District Attorney's Office picked up their investigation.

Testimony of David Rouland

David Rouland testified that he is a current employee of the Bucks County Controller's office. He previously worked for the Bensalem Police Department for twenty-six years, twenty-four of which he spent in the criminal investigation division. By the end of his career, Rouland stated that he was doing "all major crimes" investigations. Rouland testified that after he retired in 2000, he received his private investigator's license in 2003 and primarily worked on legal business and insurance investigations. Rouland began working for the Controller's office in 2010. Rouland stated that the Controller's office is not affiliated with any political party and operates as an independent entity within Bucks County.

Rouland testified that shortly after beginning work in March 2010, Raymond McHugh, a Republican and the Bucks County Controller, assigned him to investigate complaints from personnel within the Register of Wills office. McHugh told him that there were allegations from people within and outside the office of abuse of and violations of county policy and asked him to investigate.

Rouland testified that the Register of Wills is not a political office and has no official political affiliation, but the Register of Wills herself is an elected Republican official. The current Register of Wills is Barbara Reilly, the First Deputy of the office is James McCullen, the Second Deputy, as of July 29, 2010, was Rebecca Kiefer, and the two administrators were Candace Quinn and Patricia Murphy. In addition to these five, there are approximately eighteen to twenty other employees in the Register of Wills office. Reilly has been working at the Register of Wills office since 1976. Kiefer has been working in the office since 1985. Kiefer is involved in Warrington Township politics and until recently was chairperson of the township board of Supervisors. Rouland described Kiefer as "just a life-long politician."

Rouland testified that in the course of his investigation, he discovered that there was rampant misuse of county employee time. Rouland stated that through interviews with current and former employees, he learned that workers at the Register of Wills were coerced into performing political work, primarily in Warrington Township, for which they were given county "comp time". Regular comp time is used as paid vacation time. However, this political work comp time was recorded in a notebook referred to as the "pink book" in order to keep it "off-the-books" and unofficial. Rouland stated that an administrator from the office would verify hours that employees spent at the polls to compensate them with comp time, even though it is against county policy to do so.

Rouland explained that employees who wished to use their “pink book” comp time would fill out a normal compensation time request form, but would write “pink book” or “pink book time” on the top. An administrator would then deduct the time from the employee’s recorded “pink book” time, rather than putting the request through normal payroll procedures. Rouland stated that the administrator would then mark the employee as working on their comp time day so that they would be paid through the county as well as receive the comp time.

Rouland testified that several people he spoke to described what happened to Register of Wills employees who refused to work the polls. He stated, “they were actually in fear, that there was a requirement that they had to work the Election Day, that it was almost a requisite to keep their job.” Rouland testified that Lisa Harrigan, for example, participated in the scheme for a time, but eventually “just got fed up with it and said I’m not doing this anymore.” Harrigan had an argument with someone in the office about this, and is now no longer an employee. Another woman refused to participate in election days and refused to complete campaign petitions; this sparked an argument with Kiefer, and the woman resigned the same day. A third woman, Dorothy Einhorn, requested not to work on an Election Day because her husband was sick. Colleen Strunk overheard the exchange between Einhorn and Candace Quinn wherein Quinn said, “you don’t understand, this isn’t a request. Make it happen.” Einhorn wound up working the polls.

As part of the investigation, Rouland testified that he gained access to Kiefer’s computer, the files contained therein, and a copy of her saved drives. With help from the county IT department, he examined a document from Kiefer’s computer that contained Election Day polling information with dates, names, locations, and hours from November 2001 to May 18, 2010. Using this information, Rouland was able to create a spreadsheet of former and current employees’ comp hours that were earned working the various primary and general election days. Over that nine year period, Rouland calculated that 1,682 $\frac{3}{4}$ hours of comp time on election holidays were earned by Register of Wills employees.

Rouland testified that he also discovered that in lieu of a traditional background check for prospective employees, the office would examine the interviewee’s voting records to determine political affiliation. The office staff also took into account whether the interviewee contributed politically or worked in politics, and whether or not they were politically active. Rouland stated that as of the grand jury investigation, all employees of the Register of Wills are registered Republicans.

Rouland testified that in addition to the political work which the employees were forced to do, there were several instances in which Kiefer compelled employees to run personal errands for her during work hours. Rouland stated he spoke to several people who described the various errands, such as picking up groceries or laundry, or waiting for the cable company at Kiefer’s home. Rouland testified that he was most confident that of all of the allegations, waiting for the cable company was most likely to have happened because it was easiest to trace. A current employee, Susan Cummings, confirmed the cable company incident to Rouland. She told him that Cindy Schrode had been forced to “wait for the cable guy” at Kiefer’s home.

Rouland also explained how the “change jar” in the Register of Wills was used. He testified that the Register of Wills charged for use of the copy machine; both staff and the general public were permitted to use it for a small fee. If someone wanted a receipt for the copier charges, the staff would enter the amount on a regular cash register and produce a receipt. If someone did not want a receipt, the staff would take the money and put it in a “change jar”. Rouland testified that copier money is supposed to be

documented and deposited into the county account. Einhorn told Rouland that she would tally the money regularly, roll up the coins, and not deposit them into an account, but give them to Quinn. Rouland stated that Kiefer and Quinn would use the money from the “change jar” for their own personal use to buy things like lunches and beverages.

Rouland testified that he began his investigation into the Register of Wills by speaking with ex-employees of the office. He stated that the descriptions of the demeanor in the office were consistent: that Kiefer was “tyrannical” and “abusive.” Rouland stated that Kiefer ran the office through a mixture of accusations, yelling, belittling, and fear. He also stated that the turnover rate in the Register of Wills is higher than any other department in the county.

Rouland testified that Concetta Grunmeier, a current employee of the Recorder of Deeds office and former Register of Wills employee, gave him much of the preliminary information for the investigation. She told him about the “pink book”, the unofficial comp time, and copy-machine charge irregularities. Grunmeier also explained that while she was the accountant for the Register of Wills, there was an audit of the office. Kiefer went to Grunmeier and asked her to move the “change jar” and keep it hidden in a safe until the auditors left, which Grunmeier did. Rouland stated that her description of the use of the “change jar” was consistent with other employees’ descriptions, and that the “change jar” money totaled about \$60 per week. Grunmeier also told him that she had to do Warrington Township political tasks during work hours. Grunmeier gave Rouland letterhead kept on the county computer to conduct Warrington political activities. He described Grunmeier’s departure from the office as “driven out by the abuse” and “because of Becky Kiefer.”

Rouland also interviewed Lisa Harrigan, a former employee. Harrigan told Rouland that there was a J Drive on Kiefer’s computer with all of the political work that Kiefer and others in the office had been doing, as well as the records of the “pink book” time. Harrigan also told Rouland that Kiefer had made remarks that Kiefer did not care if anyone examined the computer because she “had it coded.” Harrigan was not sure if she had any “pink book” comp time, but stated she had never used the unofficial comp time—a fact that Rouland stated he had confirmed by consulting the spreadsheets found on Kiefer’s computer. Harrigan confirmed the running of personal errands for Kiefer. Rouland stated that Harrigan left the office because she “got tired of arguing” with Kiefer, and refused to do political work.

Rouland testified that he also interviewed Kathleen Hennessy who now works in the Human Resources Department for Bucks County. Hennessy confirmed the improper use of the “change jar” and the existence and use of the “pink book”. She described the political work in the office as “completely out of hand” and directed by Kiefer and Quinn. Rouland stated that Hennessy explained what happened to employees who complained about the amount of political work: “you became a target.” Hennessy told Rouland that after Renee Chantelau refused to fill out political petitions for Reilly’s re-election, Kiefer got into a “big screaming match” with her and Chantelau resigned that day. Rouland testified that Hennessy also changed jobs due to the working conditions at the Register of Wills.

Rouland also interviewed Jane Wenda, a former employee of the Register of Wills office, and she, too, acknowledged the existence and use of the “pink book” and the comp time. Rouland stated that Wenda was heavily involved in Middletown Township politics. Wenda told Rouland that in the last election, Reilly wanted Kiefer to run for Register of Wills. Wenda explained that local Republican officials told Reilly that they would not support Kiefer, and they approached Wenda instead. When Kiefer learned that Wenda might be running for the position, Wenda went from being an “exemplary employee to harassed and

reprimanded and picked on every day.” After four months of this treatment, Wenda had a nervous breakdown and was hospitalized. Wenda now works for the County of Bucks in General Services.

Rouland testified that he then began interviewing current employees of the Register of Wills office. He stated that James McCullen, First Deputy of the Register of Wills, told him that he was completely unaware of the political activities in the office, though McCullen did state that he did know that the employees were compelled to work on election days. Rouland explained that the one time McCullen had complained to Reilly about Kiefer’s attitude in the office, Reilly told him not to complain again or he would be fired. McCullen told Rouland that he was aware that staff performed personal errands for Kiefer on county time.

Rouland stated that her information regarding the “pink book” was consistent, and that Yolanda Benscoter both knew what the comp time was for and how it was redeemed. Benscoter acknowledged to him that she knew it was wrong to use the “pink book”. Rouland testified that Patricia McNeill, Carol McGill, Maryellen Jacoby and Donna Riss also confirmed the existence and use of the “pink book” and the unofficial comp time, as well as the “change jar” and how it was used. Jacoby and Riss also informed Rouland that the staff would charge the public money for any “family trees” requested and give the money directly to Kiefer. Rouland stated that “family trees” are now free.

Rouland testified that Cindy Lauer and Robin Gallagher confirmed both the existence and use of the “pink book”, and Kiefer’s “tyrannical” nature in the office. Gallagher told Rouland of Vicky Shastay, whom Kiefer had escorted out of the building by security after arguing with her. When Rouland contacted Shastay, she confirmed the existence and use of the “pink book” as well as the “change jar” and how it was used.

Rouland testified that Donna Hampshire reluctantly admitted knowledge and use of the “pink book” in the Register of Wills. She told him that she used her comp time by requesting time off from Patricia Murphy, and that she had heard of some employees running personal errands for Kiefer. Hampshire also expressed anxiety to Rouland about possible repercussions that could occur as a result of her giving him information.

Rouland testified that in his interview with Colleen Strunk and Lisa Sutherland, both current employees, both confirmed the existence and use of both the “pink book” and the “change jar”. Sutherland told Rouland that Quinn had asked her to lie to Rouland “to protect Barbara.” Strunk also confirmed that Cindy Schrode, Connie Siracusa, Maryann Groninger, and Peggy Swartz all performed various personal errands for Kiefer during county work hours.

Rouland testified that Cindy Schrode admitted knowing about the investigation, but did not want to answer any questions about it. Connie Siracusa also spoke to Rouland, but denied seeing anyone ever do any political work in the office. Rouland added that Siracusa is a committeeperson in Warrington Township.

Rouland testified that Dorothy Einhorn denied any knowledge of the “pink book”, even though she had accumulated 69 hours of comp time, according to the records obtained through the investigation. When Rouland tried to interview her a second time, Einhorn told him that she had nothing further to say and hung the phone up on him. Rouland testified that he believes Einhorn is afraid of losing her job and fearful of the intimidation perpetrated by Register of Wills administrators.

Rouland testified that Maryann Groninger, whom he described as heavily involved in Bensalem Township politics, denied any knowledge of wrongdoing in the office. He stated that she has worked at the Register of Wills for a long time and is very friendly with Quinn, Murphy, Kiefer and Reilly.

Rouland testified that Patricia Caimano denied any knowledge of the “pink book”, even though her name was recorded on the “pink book” documents later found on Kiefer’s computer.

He added that Caimano denied doing any personal errands for office administrators during work time, and that she said she only volunteered at political events. Rouland described her as “very guarded” during their interview.

Rouland also interviewed Susan Cummings, another current employee. She told him that she volunteered on election days because she was involved in the local school board, and denied that she received any “pink book” comp time. Cummings was also unaware of any copier charge irregularities.

Rouland testified that after each employee he interviewed left his office, that employee would be called into Quinn or Kiefer’s office and questioned by Kiefer, Quinn, and Murphy about what Rouland and the employee had discussed. Rouland also stated that around the time the investigation was discovered by the employees of the Register of Wills office, the protocol for the “pink book” comp time changed. Sutherland told Rouland that instead of taking whole days off, employees now had to come into the office for at least an hour, in order to use their courthouse pass and document their presence.

Rouland testified that he conducted his first interview for the investigation on May 7, 2010. On May 17, 2010, he received a phone call from Colleen Strunk stating that the staff and the office people were “shredding documents and packaging files and deleting data from computers all day long.” Rouland learned through an interview with Peggy Swartz that Swartz showed Patricia Murphy how to copy files from the office computer and how to delete the original. Quinn then took the copied files and placed them into her car. Swartz told Rouland that over a three or four day period, she had packaged twelve file boxes and placed them into Kiefer’s car. Rouland testified that Strunk confirmed this course of events.

Swartz also told Rouland that after learning of the investigation, Kiefer, Quinn, Murphy, and Reilly attempted to discover who in the office had contributed information to the investigation.

Testimony of Cindy Lauer

Cindy Lauer testified that she worked at the Register of Wills and Orphans’ Court in Bucks County for eight years as a probate clerk and accountant. She emphasized that she is not a CPA, despite her title. She was responsible for ordering office supplies, tallying up the cash registers, and writing bank deposits. Lauer explained that she also reported income and ledger accounts to the Controller each month.

She then elaborated on her duties as accountant, and explained that she broke down her income reporting into ledger accounts. The 20-30 ledger accounts, for things such as marriage licenses, adoptions, etc, were disbursed into a certain numbered account that was then reported to the Controller’s office. Lauer testified that fees for probating wills, filing petitions, and other small fees were put into the cash register in the office and later deposited.

Lauer testified that the money for deposits did not come from either the “change jar” or “change box” next to the register. She stated that the “change box” was used to make change for larger bills and held change collected from copier fees. When a customer did not ask for a receipt for copying, the change was put into the box. Lauer stated the money from the “change box” was never deposited. She did see Becky Kiefer take money from the box to pay for her own lunch and Kiefer tell others to use the money to buy her sodas. Lauer recalled that Kiefer asked particular employees to do her errands, but could not remember anyone specifically. When asked if anyone was asked to run personal errands for Kiefer, Lauer recalled that occasionally Candy Quinn and Cindy Schrode would say they were “leaving to run an errand for Becky” or leaving to “run an errand for Barbara.” Lauer added that there were other employees as well, but could not recall their names.

Lauer testified that she was not aware of the “pink book”, but did know about a binder in which records of comp time were kept. She stated that her first supervisor, Sandy Pappert, showed it to her early in her career at the Register of Wills. Pappert was an administrator at the time, and Pappert’s supervisor was Barbara Reilly. Lauer recalled that Pappert told her she would receive “off-the-books” comp time for political work that she did in or outside the office. While she was still being trained, Eileen Heitz told her that the “off-the-books” comp time should not be talked about outside the office and that “this is the way they do it here.” Lauer emphasized that “off-the-books” comp time was in addition to any regular comp time, vacation, or sick time that she accumulated.

Lauer testified that some of this type of political work included working the polls on Election Day. She believed she may have received time and a half for working at the polls, but was not sure. Lauer noted that because Election Day is a county holiday, she was paid in addition to receiving “off-the-books” comp time. She explained that either Pappert or Sheila Bass would go around to each employee and ask which poll they would work, or simply tell the employee where she was needed. It was “definitely expected for employees to work the polls as part of their duties at the Register of Wills”. Lauer testified that one year she told Bass that she was not going to work on Election Day. Lauer was told by Bass that Reilly would inform the leadership of the Republican Party as to who would be working at each poll.

Lauer worked both for Kiefer’s campaign for Warrington Township Supervisor and Barbara Reilly’s campaigns for Register of Wills. She did not work on any other campaigns during work hours. Lauer testified that she was either assigned or asked which polling place she would be working on Election Day, and was occasionally given a political button to wear that said “Vote for Barbara Reilly.” Lauer stated that employees were expected to work the polls the entire day if Reilly was running that election year, and were told that Reilly wanted them there by Kiefer, Quinn, Bass, and Pappert at various points.

Lauer recalled that on one occasion, employees were told to go to an office on Easton Road by the Wellness Center to make political phone calls for Kiefer’s election as Warrington Township Supervisor. She testified she was told to tell people “vote for Becky Kiefer” and “don’t forget to vote tomorrow.” Lauer could not recall whether it was Luce or Kiefer who told her to make the phone calls, but did remember that it was after business hours. Lauer stated she believed Renee Chantelau quit because she was asked to make phone calls during office hours, an act Chantelau thought was wrong.

Employees were also asked to go to Republican Headquarters across the street from the Register of Wills office to do political work during their lunch break. Lauer testified that she was asked to stuff and address envelopes for Republican political mailings. If employees worked at headquarters after work hours, they were given “off-the-books” comp time. Lauer testified that if employees wanted to take

advantage of their “off-the-books” time they would ask Pappert, while she was supervisor, and later on they would ask Quinn or Bass. At any point, employees could ask Bass or Quinn how many hours they had accumulated, and one of them would check the book in which hours were recorded. Lauer admitted that her earning fifty-seven hours of “off-the-books” comp time was “certainly feasible”, and that she used all of it over her eight years at the Register of Wills.

Lauer stated she spent most of her time in the office doing Register of Wills work, though she added that there were certain individuals who did more political activity than others. She named Quinn, Bass, and Lisa Harrigan – Kiefer’s assistant – as some of these individuals.

Lauer also worked at exhibits at the Grange Fair answering questions about wills or estates, adoptions, and other services performed by the Register of Wills. She testified that they sometimes sold “family trees” at these events for a dollar, and other times merely gave them away. She did not know what happened to the proceeds from “family trees”, but stated that “it’s possible” it was put into the cash register. Lauer testified that around 2006, Kiefer, Quinn and Bass held a meeting with employees from both sides of the office about the secrecy of the political work. She recalled that word had gotten out that employees were doing political work in the office on county time, and Kiefer was concerned. Lauer explained that David Sanko, whom she knew to work for the Bucks County Commissioners, spoke with Kiefer about the political work. Kiefer told them “every row officer does it, but nobody talks about it. So if anybody asks you if this is going on, just tell them no.”

Lauer stated that she did not have much interaction with Barbara Reilly aside from pleasantries. She explained that while Reilly was the technical head of the office, she never witnessed Reilly actually run the office or give directions to anyone. Instead, “Kiefer would be in charge” of the day-to-day running of the office. While Kiefer often told employees “Barbara wants you to do this” she also just gave directives to employees.

Lauer described the office before Kiefer became Second Deputy as “very nice” and a pleasant place to work. Around 2004 or 2005, when Kiefer became Second Deputy, “people were just treated poorly” and unprofessionally. For example, Lauer recalled that new employees trained other new employees, and that many people just did not come into work. When asked who did not go to work, Lauer named Kiefer and Quinn, saying they missed approximately 25% of all work days. Lauer also stated that Quinn and Kiefer verbally mistreated employees, calling them “idiots” and “stupid” in front of customers and attorneys. She added that while Bass was nice to her, she did mistreat others.

Testimony of Mary Ellen Jacoby

Mary Ellen Jacoby testified that she currently works for the Bucks County Sheriff’s Office as a clerk in the personal property division, and has been in that office since 2005. Prior to her employment there, Jacoby worked for the Bucks County Register of Wills for twelve years, resigning in 2005. During her time in the Register of Wills, Barbara Reilly was the row officer, James McCullen was the First Deputy, the Second Deputy when she left was Becky Kiefer, and the two administrators were Candace Quinn and Sheila Bass.

Jacoby testified that as a part of her job as an employee, she was expected to work the polls on election days, and in return they were given time and a half “off-the-books” comp time. She explained that everyone would report to a supervisor what hours they worked, and then the supervisor would record the

time in a notebook that was kept in a locked drawer. She never heard the term “pink book” used. Jacoby recalled that McCullen, Kiefer, Quinn, and Alyce Luce all implied to people in the office that they had to work the polls because they got their jobs through political connections. Jacoby specifically remembered that she was referred to the office by a political friend, and so she was told that she had to “repay” the Republican Party by working the polls and putting together campaign literature.

Jacoby testified that while she worked at the office, office policy did not provide for work-related comp time. She never worked at the Grange Fair after hours. Reilly, Kiefer, Quinn, and Luce all told her at various times that the “off-the-books” comp time was not to be public knowledge. She could not recall a specific instance where she used her accumulated comp time, but was positive that she had used it at some point.

Jacoby testified that she never witnessed Kiefer or anyone else doing political work for Kiefer’s Warrington Township Supervisor position. She did, however, suspect that it went on because of something she found on an office computer. In a section of the office drive where Microsoft Word documents were kept, Jacoby stated that she found some Warrington Township paperwork, letters to the Township, and the like. She opened the file, printed it out, but threw it out after a few years because she felt no one believed her complaints about the office. Jacoby also testified to the use of the two silver tins in the office that were for so-called “petty cash.” She explained that the copying fees for title searches were almost always placed in the tins unless the customer wanted a receipt, in which case the cash payment went into the cash register. Some people would make change from the tin if they needed it, but Jacoby said she also witnessed Kiefer take money for her lunches, saying she would replace it later. She never saw Kiefer put money back into the tin.

Jacoby also testified that the office sold “family trees” for a dollar at the Grange Fairs, but sometimes they were given away for free to school groups or children. Jacoby stated that the money collected, usually around \$10 a night for the Grange Fair, was given to the supervisor, though she never saw it rung up on the cash register or deposited anywhere. She added that Quinn knew the office sold “family trees” for a dollar, but would not be surprised if Quinn testified that they were never sold. Jacoby estimated that the proceeds from the “family trees” probably totaled a few hundred dollars over a period of years. She believed that Kiefer was in charge of “family tree” sales and distribution.

Jacoby testified that she was coerced to put together campaign literature, and to stuff and label envelopes during work hours. She was told that if she was not busy, she had to be doing political work. Jacoby also recalled that she and other employees often went to Republican Party Headquarters across the street during their lunch hour to work. She added that if there was a fundraiser for Reilly coming up, then Quinn, Kiefer or Luce told them to go during working hours to make phone calls asking people to buy tickets for it. Jacoby also testified that she was asked to go knock on neighbor’s doors about voting, but that she did not do it. She added that her refusal was unacceptable to the supervisors.

Jacoby testified that if someone refused to do political work or got on the wrong side of the administrators, they became targets of harassment. For example, a supervisor might change the protocol for a task, not tell the employee, and then write them up for doing it incorrectly. Administrators also changed employees’ seats frequently. Jacoby added that Reilly sometimes looked into voting records and asked why employees had not voted, and would check which political party employees belonged to. Jacoby also described the “naughty chair” where employees were sent to answer the phones at the front

of the office as a form of punishment. She stated that she was never made to sit in the “naughty chair” but said it was like being “in kindergarten, the time-out chair.”

Jacoby testified that she ultimately quit because of this type of harassment in the office and that she felt like it was not going to be a comfortable work environment. She added that she believed she always performed well in her position, and that she had never had a complaint from a judge about her work. Jacoby recalled that Wenda was the only employee forced to ask to go to the bathroom and report when she came back. She added that Vicky Shastay and Eileen Heitz were also picked on by administrators.

Jacoby described the office as entirely Republican and “absolutely” anti-Democrat. She recalled once incident where Reilly said “I can’t believe that she was in this office. Get her out of here. I don’t want any Democrat in my office” when a Democratic County Commissioner came through the office.

Jacoby testified that no one ever approached her about testifying before the grand jury.

Testimony of Lisa Harrigan

Lisa Harrigan testified that she worked at the Register of Wills from 1998 until 2006. She was originally interviewed for a position as a retention clerk specialist. Harrigan stated that she was not asked about her political affiliation or activity during her job interview, nor was she told that the administration considered it a political favor to hire her. She was later promoted to probate clerk 1, probate clerk 2, and finally senior probate clerk for her last five years in the office. Harrigan explained that her official duties as a senior probate clerk were to assist the Registrar—Barbara Reilly—probate estates, answer phones, and assist other clerks.

Harrigan testified that the office hierarchy was Barbara Reilly as Register, followed by James McCullen as First Deputy, Rebecca Kiefer as Second Deputy, Sandy Pappert as office administrator on the Register of Wills side, and Alyce Luce as office administrator on the Orphans’ Court side. She also recalled that Susan Hardy, Candace Quinn, and Sheila Bass also served as administrators.

Harrigan testified that in addition to her duties as senior probate clerk, she also felt like she was Kiefer’s assistant. She stated that she felt this way because Kiefer gave her various duties to do in addition to her normal responsibilities, including stuffing political envelopes and making dinner reservations for Kiefer and her husband. Harrigan stated that Kiefer had no official secretary in the county office, but believed that there was one for Kiefer’s position as Warrington Township Supervisor.

Harrigan was not aware of any employees performing personal favors for Kiefer. She testified though that she sometimes drove work materials to Kiefer while she was at the nail salon, took laundry to the dry cleaner, and picked up Kiefer’s car, though she claimed the laundry was related to the county’s holiday program.

Harrigan also performed political work in the office for Reilly at Kiefer’s request. Harrigan testified that Kiefer asked her to make political phone calls during work hours and repeatedly intimidated her and other employees into doing it. Harrigan added that she and other employees sometimes used their lunch hour to put together Republican literature and bags of materials across the street from the courthouse at Republican Headquarters. She also recalled that employees were asked to stuff envelopes at their desks. Harrigan specifically remembered that when new office furniture was purchased, they were all given privacy screens so that customers would not see if they were doing political work. Harrigan also

recalled that on multiple occasions Kiefer told her that she “owed” Reilly and insinuated that Harrigan got her job through political connections. Harrigan explained that when she applied for the position at the Register of Wills, she included a letter of recommendation from the Mayor of Bensalem. She added that her mother also worked on the mayor’s campaign.

Harrigan testified that in addition to the intimidation regarding working the polls, Kiefer pressured her about her husband’s political affiliation. Harrigan explained that her husband is a registered Democrat, yet Kiefer told her several times to convince her husband to change to a registered Republican. Harrigan recalled that twice, Kiefer actually handed her a voter registration form and said she wanted Harrigan to have her husband switch his party affiliation to Republican. Harrigan refused. Harrigan also stated that she complained to Reilly twice about Kiefer’s statements, but that Reilly did not believe her.

Harrigan also testified that Quinn did political work for Kiefer during work hours. She was not sure if other employees did political work for Kiefer. Harrigan testified that she herself took phone calls for Kiefer regarding Kiefer’s role as Warrington Township Supervisor at her desk. She also had access to Kiefer’s computer on which phone lists and political handouts were kept in a shared drive “specifically for her and for Barbara.” She first stated she did not know if comp time spreadsheets were kept on the shared drive, then admitted that there was a file called “comp time” on it to which she did not have access. Harrigan denied that Kiefer ever encoded or encrypted any files, then admitted that she told Investigator Rouland that Kiefer made comments about having encrypted them.

Harrigan testified that it was “basically understood” that employees had to work the polls on Election Days for Reilly. Harrigan stated she “did not like the experience” so she tried to get a political position through the local Republican Headquarters where she would not be allowed to work the polls. She added that she did not like handing out political literature for Reilly, either, though she admitted that she never said anything to any administrators about it.

Harrigan denied any knowledge of anything called the “pink book”. Harrigan testified that she was only aware of a red folder in which Pappert kept legitimate comp time for weekend or after-hours exhibits directly related to Register of Wills work. She added that the red folder information is all computerized now. Harrigan testified that it was only after an office audit by the Controller’s Office that the administration began keeping track of comp time.

She testified that she “never had any solid knowledge” of “off-the-books” comp time, conceding only that there were rumors in the office. She added that, to her knowledge, actual “off-the-books” comp time never materialized. Harrigan could not say whether she was ever given illegitimate comp time for working the polls because when she requested time off from work, she never distinguished between comp time, vacation, or sick days. She explained that she just asked administrators whether she had time left to take and they would tell her, “yes or no.” Harrigan denied that she told the Controller’s Office Investigator Rouland that she knew what the “pink book” was and how it was used. She also denied ever hearing of employees submitting slips for time off and writing “pink book” on top of them.

Harrigan testified regarding the “change jar” in the office and how it was used to collect money from copier fees, and she also talked about selling “family trees” at Grange Fairs. Harrigan explained that “family trees” were sometimes just given away, but were also sold for one dollar. She estimated that they sold \$10-\$15 worth per night when they were sold at the Grange Fairs, though employees would sometimes give them away to people who did not want to pay. She added that Kiefer always wanted

them to charge for the “family trees”. Harrigan stated Kiefer put the proceeds from the sales into the “change jar” and sometimes used the money to buy ice cream or lunches for the office, and sometimes just for her own lunch. She also recalled that Pappert and Bass had access to the “change jar”. Harrigan witnessed Kiefer take money several times throughout a given year.

Harrigan testified that money from copier fees was also put into the “change jar”. If a customer wanted a receipt for copies, the money was supposed to go into the cash register, but at all other times it went into the “change jar”.

Harrigan testified that she quit after having an altercation with Kiefer. She stated that she returned from vacation and within a short time Kiefer became upset with her about a probate file. Kiefer screamed at her, cursed, took away her responsibilities, and told her to keep two separate notebooks for the same hearings. Kiefer also told the other employees that Harrigan should no longer be treated as a senior probate clerk, even though she would retain the same title. Harrigan testified that she went to the Human Resources Department and spoke to the union about Kiefer’s treatment, but no action was ever taken. She added that she went out on medical leave in the weeks before she quit due to work stress. Harrigan stated that the Human Resources

Department offered her a different position within the county, but she did not even want to work in the same building as Kiefer. Instead she left and took a job with Univest National Bank and Trust Company.

Harrigan then conceded that part of the reason she left the office was because all of the political work interfered with her normal job responsibilities. She testified that Kiefer never asked her to destroy anything on the computer or destroy any documents. Kiefer did tell her that political work was supposed to be secret.

Testimony of Donna Riss

Donna Riss testified that she currently works in the Sherriff’s Department of Bucks County. Prior to joining the Sheriff’s Department in 2005, Riss worked in the Orphans’ Court as a clerk for sixteen years. From 1989 until 2005, she held various positions including marriage clerk, marriage license coordinator, and finally adoption clerk for her last eight months in the office. Riss estimated that she did marriage work the vast majority of her time there. Riss stated that she left Orphans’ Court because she did not like the way the administrators ran the office and had treated the employees for the last ten to twelve years.

Riss testified that the row officer of Orphans’ Court was Barbara Reilly, James McCullen was the First Deputy, and the Second Deputy during her time there was Rebecca Kiefer. Her first supervisor was Alyce Luce, and once Luce retired, Candace Quinn took over as supervisor. The supervisor in the Register of Wills side was Sheila Bass when Riss retired. Riss stated that she did not have much interaction with McCullen, and that Kiefer ran the office. She explained that while early on Reilly was in the office daily, several years into her time working there Reilly came in only three or four times a month.

Riss testified that she was asked to work the polls on election days, handing out political literature for Reilly in every primary and general election in which Reilly ran. Riss supposed that someone could say no, but “you didn’t feel like you could” because the administrators would “make things difficult for you.”

Riss also testified that employees received time-and-a-half of “off-the-books” comp time for working the polls. She explained that this meant she could take time off and still be compensated without having to

use sick or vacation time. Riss added that she was told not to tell people outside the office that she received unreported comp time.

Riss testified that either Quinn or Luce kept track of the unreported comp time on a large chart that was kept in a folder in the supervisor's desk. She never heard the term "pink book" used. In order to take advantage of her comp time, Quinn or Luce would have to approve it, and they would keep track of each date it was used on a chart with the employees' names on it.

Riss testified that she remembered several specific days on which she always took her unreported comp time, including her daughter's birthday on December 18th and a few Black Fridays. Riss identified Grand Jury 14, C-12, exhibit number 5, as her payroll records. On a record dated November 27, 1995, the day after Thanksgiving, Riss saw that she was marked as 7 hours of regular pay even though Riss believed she was not in the office that day. She remembered that she was absent because she took off that day due to her elementary school-aged daughter being home from school on that date. Riss added that if she had taken vacation or sick time, it would not have been marked as "R" for regular. On a payroll record dated December 18, 1995, Riss identified that she was marked as paid for 7 regular hours even though she was "positive" that she did not work that day. She was sure because she always took off for her daughter's birthday. She emphasized that if she had taken sick or vacation time, it would not have been marked as "R" for regular. She also identified one other year where she was marked as 7 hours regular pay on her daughter's birthday, December 18th, even though she was positive she was absent.

In addition to working the polls, Riss testified that employees also did other political work in the office during work hours. She recalled that she did mailings for Reilly's election campaigns, for fundraisers, and she remembered seeing other employees doing political activities related to Warrington Township. Riss emphasized that she was told to do these activities, and believed that there would have been ramifications if she had refused.

Riss believed that work relating to Warrington Township for Kiefer in her position as Township Supervisor occurred in the office as well. She testified that she witnessed Kiefer working with Warrington letterhead on her work computer, and recalled that Kiefer took people who said they were from Warrington into her office to meet during work hours. Riss also testified that Kiefer kept file cabinets in the back of the office with tabs on the outside labeled "Warrington", which Riss assumed were for Kiefer's job as Township Supervisor.

Riss testified that a copy tin was kept for money paid for photocopies. She explained that if the customer did not want a receipt, she was supposed to put the money into the copy tin. On several occasions, she witnessed Kiefer take money out, and specifically remembered that Kiefer once used the money to pay a lunch deliveryman. She also saw Quinn take money out once, but did not know what it was used for.

Riss was also familiar with the "family trees" in the office. She believed that they were ordered already-printed from a print shop. Riss testified that during her entire sixteen years working in Orphans' Court, "family tree" sheets were always sold for a dollar. Riss estimated that for a four or five day Grange Fair during which they sold "family trees", the proceeds totaled about \$120. The money was then placed into an envelope, attached to the office checkbook, and placed into a safe. She does not believe it was ever deposited with the county because the money was never rung up in the cash register.

Riss also testified as to the payroll sign-in sheet used in the office. She explained that every employee had to sign in and sign out of the office in order to keep track of their hours. Riss stated that Luce trained her to do payroll, and instructed her to always mark Kiefer as present “whether she was there or not.” These payroll records were kept and submitted to the county weekly, and Riss believed that the supervisor would have to look over the sheet after she completed it. After she asked why she had to mark Kiefer as present when she was not in the office, Luce did not ask her to enter payroll anymore. Riss believed that at the time, approximately 1995 or 1996, Kiefer was an hourly employee.

Riss testified that before working in Orphans’ Court, she had never been involved in politics, had never worked the polls, or handed out political pamphlets. She added that it was never something she really wanted to do, but that she was asked to work the polls approximately twice a year, every year that Reilly ran for election. In the last ten years she worked there, she also had to work in every election regardless of whether Reilly was running.

Testimony of Concetta Grunmeier

Concetta Grunmeier testified that she worked at the Register of Wills in Bucks County for 21 years, from 1986 until 2007. Barbara Reilly and Becky Kiefer interviewed her for a marriage clerk position. Grunmeier stated that they did not ask her about her political affiliation or activity, but she was told that political work would be required for the job. Grunmeier recalled that at the time, Kiefer was an administrative assistant.

Grunmeier testified that once she began working at the Register of Wills, Reilly and Kiefer told her that she could receive “off-the-books” comp time for doing political work in the office. They also told her not to talk about it to anyone else. Grunmeier explained that for every hour of political work, she received an hour of comp time or time-and-a-half pay, depending upon the circumstances. She estimated that over the course of her twenty-one years, she accumulated approximately forty-one hours of “off-the-books” comp time. She recalled that many of her hours were earned working the polls in Hilltown or Warrington Townships on Election Days, depending on whether it was Reilly or Kiefer running for office. Grunmeier stated that she never wanted to work the polls, had never worked them before her job at the Register of

Wills, and has not since she left in 2007. She also added that she knew Reilly was aware of her working the polls because Reilly commented about it to her once.

Grunmeier testified that political work was done in the office for both Reilly and for Kiefer in her position as Warrington Township Supervisor. Grunmeier recalled that whenever Reilly ran for office, she had to make political phone calls with a script to potential voters, all during work hours. She did not want to make phone calls, but did not want to find out what would happen if she said no. She was also aware of employees who were made to hand out political literature all day long at train stations, though she was not among them.

Grunmeier also testified that she was required to purchase tickets to political fundraisers for Reilly, costing up to \$100 a piece. Reilly expected her to buy two because Grunmeier had a good paying position as an accountant in the office. She added that if employees could not attend after they bought tickets, Reilly wanted them to return the tickets to her so she could arrange for her family to attend for free. Grunmeier always kept her tickets regardless of whether she could attend or not. Grunmeier stated that she had to stuff envelopes and print materials with Warrington Township letterhead on it for Kiefer, and recalled that Kiefer sometimes received faxes and phone calls regarding Warrington Township and

acted on them during county time. During her testimony, Grunmeier identified Grand Jury 14, C-12, exhibit number 7 as a copy of a fax Kiefer received in the Register of Wills for her job as Township Supervisor. She knew it was related to Kiefer's Supervisor position because it had to do with fire calls, and she remembered Kiefer had to do work with fire companies for Warrington Township.

The process to take advantage of "off-the-books" comp time was simple. Grunmeier testified that all she had to do was ask a supervisor if she could use her comp time, and that person would subtract it from the recorded hours. She never heard the recorded hours referred to as the "pink book", but believed that the hours were recorded on a tablet and kept in a folder. Grunmeier stated that at various times, Kiefer, Harrigan, and Quinn had possession of the tablet.

Grunmeier testified that during her tenure at the Register of Wills, she was promoted twice: first to marriage license coordinator, and then to accountant for both sides of the office. While she was a marriage license coordinator, her supervisor was Delores Boise, then Sue Hardy, and finally Alyce Luce. As an accountant, her responsibility was to make and assemble deposits and reconcile the cash registers every day. At the end of each month, she sent a monthly report to the County Controller's Office. She stated that occasionally she would find discrepancies in the billing of up to twenty dollars, but that it was usually a result of being rung up incorrectly. She also explained that money was rung up on the cash register under different labels: i.e., estates, inheritance taxes, and copy fees. There was no notation of whether a receipt was given.

Grunmeier testified that the "change boxes" were in use for the entire time she worked there, and she never accounted for the money kept in them. She stated that she never prepared the money from the boxes to be deposited. Rather, they were kept in a safe at night and put back out during the day. She stated Kiefer specifically told her not to account for the "change box" money. Grunmeier witnessed Kiefer, Harrigan, and Reilly all take money out of the "change boxes," although she could not say how much nor what they did with it. She emphasized that no accounting was ever done of the "change boxes."

Grunmeier testified that she was present for annual office audits that she believed they had notice for ahead of time. She stated that in preparation for audits, Kiefer would order the "change boxes" be put into the safe where the auditors would not see them. She also recalled that auditors never went into the safe. They only checked the cash registers. Grunmeier testified that she was not privy to the audits because she was not an accountant at the time, but recalled that once, the auditors came in with a list of things that were wrong and she was sent to a warehouse to collect records.

She also remembered a "change jar" kept for Tootsie lollipops. Grunmeier testified that James McCullen took donations for a lollipop and donated it at the end of the year to a charity. She recalled that Kiefer took money out of that jar.

Grunmeier testified that when she first began work at the Register of Wills, "family trees" were given away for free. As accountant, she recalled that she paid about \$110 for 5,000 "family tree" papers from the county printer. Grunmeier also stated that around 1991, the office began selling them for a dollar, and this practice continued until she quit in 2007. She estimated that the proceeds from "family tree" sales were rung up on the cash register half the time, and the rest of the time it was put into an envelope. Grunmeier testified that she never prepared a deposit for this money.

Grunmeier testified she first learned of the investigation when she was contacted by the county Controller's Office. Employees have asked her at her current job in the Recorder of Deeds about the investigation. Grunmeier stated that no one tried to influence her testimony nor asked her to testify a certain way.

Finally, Grunmeier testified that she left the office because of "harassment" and she "couldn't take it anymore." She stated that she took a \$9,000 pay cut when she left and moved to the Recorder of Deeds. Grunmeier added that her current boss is an elected official, and she does not do political work in that office.

Testimony of Robin Gallagher

Robin Gallagher testified that she was previously employed at the Register of Wills in Bucks County from 1994 until 2004, when she stated Barbara Reilly, the Register of Wills, forced her to resign. For the majority of her time in the office, she worked on the collection of inheritance taxes collected by the county.

Gallagher testified that Reilly was the head of the office, Rebecca Kiefer was the "next in command" and Sandy Pappert was her direct supervisor when she first began working there. When Pappert retired, Sheila Bass became Gallagher's direct supervisor.

Gallagher stated that Harrigan was able to, and often did, access other employees' work computers and email accounts. She said that this made her uncomfortable because Harrigan was considered Kiefer's assistant.

Gallagher testified that at the time she transferred to the Register of Wills from Human Resources, Reilly, Pappert, and McCullen interviewed her for the position. Gallagher stated that she was never told she had to keep track of her hours worked at the polls. They did not ask her any questions regarding her political affiliation or politics in general. When she began working at the office, McCullen told Gallagher that "you have to put your time in" and work on political activities because "that's how you got your job." Gallagher was also told that the Register of Wills was a political office.

Gallagher testified that Reilly forced employees of the Register of Wills to perform political work during the time they were in the office, including working the polls on Election Days, for which they would receive "off-the-books" comp time. After each election, Kiefer or Pappert gave each employee a slip of paper with their comp time on it. Gallagher explained that when employees took time off, Pappert or Kiefer made sure their comp time was used first, then sick days, then vacation days. Gallagher recalled that she often took Black Fridays off, and that she was always paid regularly for days on which she used her comp time. After approving her use of comp time, Pappert or Kiefer would write down how much comp time she had left and give the slip of paper to her. Gallagher also stated that Kiefer kept the book in which the comp time was recorded on her desk. Though employees never clocked in or out for the first several years she worked there, Gallagher stated that after awhile they were required to start signing in on a handwritten sheet at the front desk.

Gallagher also testified as to specific political activities that employees were required to perform. She recalled that, for example, Reilly directed her and other employees to hand out pamphlets for Reilly's various elections, stuff political envelopes, and perform other political work. Gallagher also testified that Kiefer told her and other employees to go to a train station to hand out political literature for several

whole work days during one week before an election. She recalled that they were at the train station for approximately nine hours per day. Gallagher testified that none of the pamphlets handed out those days were related to Register of Wills work, nor was any Register of Wills work done on the days that she was at the train station. When doing this, Gallagher stated she was paid her normal wages and in addition was given “off-the-books” comp time by Reilly.

Gallagher testified that prior to an Election Day, Kiefer would make a master schedule for the employees in the Register of Wills that detailed where they had to go to work the polls and how long they had to be there. Gallagher stated that Kiefer showed each employee their spot on the schedule and told them their allotted shift as well. After working the polls on Election Days, Kiefer told Gallagher that she received comp time for those hours in addition to her regular pay.

In addition to the out-of-office political work, Gallagher testified that she was also asked to perform political activities in the office during work hours. She stated that for example, she had to fold literature, stuff envelopes, and mail them. Gallagher recalled that Reilly asked her to do this primarily during years in which Reilly ran for office, but that Kiefer asked her to do it as well.

Gallagher also testified that she was forced to attend political fundraisers that she had to pay to attend. She recalled that Reilly asked employees to buy seats at her table for Republican fundraising dinners where tickets cost approximately \$65.

Gallagher testified that if anyone ever refused to do political work, they were forced to resign or they were fired. She explained that even though most of the employees belonged to a union, Kiefer was the union representative for the office until 2000. She stated that Kiefer often dismissed employees’ complaints around the office, including an incident in 1997 in which Gallagher stated that Quinn assaulted her. At the time of the incident, Gallagher had just returned from a year of leave during which she dealt with a brain abscess. Gallagher stated that Quinn told her she was furious that Gallagher had returned to work at all, then came up behind her and yanked Gallagher’s hair, knowing she still had stitches from her brain abscess treatment. Gallagher testified that Kiefer’s response to this incident was “Oh, she wouldn’t do that.” Pappert and Luce, two other administrators, also dismissed Gallagher’s complaint.

Gallagher testified that she was voted the new union representative in 2000. She stated that whenever she tried to defend a co-worker as their union representative, Reilly “came after” her and the employee. Gallagher recalled an instance where she tried to prevent Vicky Shastay from being fired without cause, and Reilly “literally was screaming” that she wanted Shastay “out.”

Gallagher testified that the petty cash drawer in the office was filled with money from customers who did not want receipts. Gallagher stated that copier fees and filing fees were examples of things for which people often did not need receipts, and that this money was placed into the petty cash drawer. Gallagher recalled that the drawer would empty regularly, and that she once witnessed Kiefer take money from the drawer as Kiefer was leaving for lunch.

Gallagher testified that “family trees” provided by the Register of Wills were sometimes sold for a dollar at the Grange Fair or Oktoberfest, and sometimes at senior events they were given away. The money from selling the “family trees” was put into an envelope and given to Kiefer or Quinn.

Gallagher testified that employees were asked to run personal errands for Kiefer and the other administrators during work hours. She recalled that Kiefer asked her to drop envelopes at Kiefer's house during work hours, but was never compensated for the miles she drove. Gallagher believed she received comp time for the length of time she was out of the office during these errands. Gallagher stated she also delivered work-related materials to Kiefer's, Pappert's and Reilly's homes.

Gallagher testified that when she resigned in 2004, Kiefer and Quinn asked her to sign a confidentiality agreement that she believed was in return for being able to keep her pension. Gallagher stated that the confidentiality agreement was designed to prevent her from talking about the activities in the Register of Wills and Barbara Reilly, and she hoped it would also protect her son and daughter-in-law, both of whom worked for the county.

Gallagher emphasized that she and many of the employees at the Register of Wills did not speak up for fear of losing their jobs. Gallagher herself said she was afraid to lose her job, and feared that her son or daughter-in-law would experience retaliation. She stated that following her resignation, Kiefer, Reilly, and Harrigan complained about her son to his boss at the county IT Department, and he was fired. Kiefer also complained about Gallagher's daughter-in-law to her boss in the county Purchasing Department. Though she was not fired, Gallagher stated that her daughter-in-law resigned.

Testimony of Eileen Heitz

Eileen Heitz testified that she worked at the Register of Wills from July 10, 2000 until July 2007. She stated that she ultimately left the office because "it was horrible" and she "couldn't handle it anymore." When asked to elaborate, Heitz explained that after she refused to lie for Kiefer, her supervisor, the office environment became hostile.

Heitz testified that eleven months into her employment at the Register of Wills, siblings with the last name McFalls came into the office to have their mother's estate probated. Heitz explained that they had signed paperwork in front of a notary instead of in front of her, but that she allowed it anyway. Around 2003, the siblings' attorney called Kiefer because the matter still was not resolved. Kiefer then "had their attorney supposedly send in a letter to revoke the letters and we ended up going to court." Heitz stated that when Barbara Reilly found out what Kiefer had done, she tried to call the McFalls to come to the office and address the problem. They refused, and the matter went to court. Heitz testified that Kiefer told her to lie and say that the McFalls estate was in another county, and that Heitz did not know what she was doing. Heitz told Reilly she would not lie for Kiefer. She recalled that after she refused to lie, Kiefer "made my life miserable."

Heitz testified that she changed her political affiliation in order to get a job at the courthouse. She explained that at the time she was a single mother looking for job security, and went to the courthouse each week to apply for open positions, but was having little luck. A friend whose name she could not recall told her to "go get registered Republican" and she might have more success. Even though she was never politically active before, Heitz stated she changed her registration to Republican.

When she interviewed for her position at the Register of Wills, Kiefer, Pappert, and Luce interviewed her. Heitz testified that at the second interview, Reilly and McCullen were present as well. She believed that they already knew her political affiliation. Heitz stated she could not recall what questions they asked her or if she was told that she would have to perform political work as part of her job duties.

Heitz testified that early on in her employment she was told that she would be “expected” to work the polls on Election Day. She stated that no one ever refused because of the potential consequences. For example, she recalled that a co-worker named Renee told Kiefer she felt uncomfortable making political phone calls and she lost her job. Heitz emphasized that she herself was a single parent and could not afford to lose her job, so she worked the polls when she was told. She stated she worked at St. Roberts in Warrington on Election Day, and that Kiefer “always showed up” to check on her since she did not like or trust her.

Heitz testified that in return for working the polls on Election Day, she was told that she would receive comp time that was “separate” from regular comp time given for working at wedding expos or the Grange Fair. This separate poll comp time was also supposed to just “stay in the office” because, Heitz explained, it was for performing political work that was not at all related to county work. Heitz testified that she was not aware of anything called the “pink book”, but she did know that the supervisors, Harrigan in particular, kept track of the poll comp time separately. She stated that she earned “off-the-books” comp time, and explained that whenever she wanted to use it she would verbally ask Harrigan whether she had enough hours to take time. Heitz stated she tried to keep her own record of how much time she had, but that it never matched what Harrigan kept. Heitz was positive that Reilly knew about the “off-the-books” comp time.

Heitz also testified that Kiefer was a Warrington Township Supervisor while she worked at the Register of Wills. Heitz stated that political activities for Kiefer’s job in Warrington were done in the office during county time such as running off copies and printing literature. This was done whenever Kiefer ran for the position again or if she just generally needed it done.

Heitz was never asked to knock on doors politically, and she testified she believed this was because she made it clear to supervisors that she had to be home with her son. She did state, however, that during her lunch break she was asked to and would go to the Republican Party Headquarters and stuff envelopes for them. Heitz said it was a choice to go over during lunch breaks or not. She denied that she was ever asked to go to a train station and hand out brochures.

Heitz did recall that she was told to buy two \$50 tickets to Reilly’s fundraiser so that Reilly or Kiefer could then give the tickets to friends for free. Heitz testified that she got into a “heated discussion” with them about having to spend so much money, and refused because she could not afford it.

Heitz testified that there were “change boxes” on both the Wills’ and Orphans’ Court sides of the office with money that was kept separate from the cash register. Heitz stated she witnessed Kiefer take money out of the box for her lunch and make change for herself. She also saw Quinn take money from the box, and witnessed Harrigan moving the box. During the two audits that she witnessed during her time at the Register of Wills, Heitz noted that the “change box” was moved and not in its usual spot, but did not know where it was during these times. Heitz was positive that Reilly knew about the “change box”.

In addition to the “change box”, Heitz testified that there was also a jar full of Tootsie Roll lollipops that McCullen put out. Customers and attorneys would put in a dollar and take a lollipop, and at the end of the year McCullen donated the money to a local charity. Heitz testified that she witnessed Kiefer take money out of the lollipop jar for lunch “all the time.” Her co-worker Mary Ellen Jacoby became so frustrated by Kiefer’s taking the money that one day she scotch-taped paper over the opening so that no one could take money out.

Heitz also testified that “family trees” were supposed to be sold at the Grange Fair, but that she refused to do so and gave them away instead. She did not understand why anyone would have to pay a dollar for a piece of paper. Heitz stated that the proceeds would be put into an envelope at the Grange Fair, and assumed it was handed in, but never knew what happened to it after that. Heitz believed that Reilly knew that they were selling “family trees”. After awhile, Kiefer let them stop selling the “family trees” because not enough money was coming in from their sale.

Heitz testified that Harrigan and Quinn would run errands for Kiefer, pick up her laundry, groceries, and house-sit on occasion. She also believed that Maryann Groninger left the office to do errands as well, but was not sure.

Heitz testified that the office environment got so bad that she contacted the union several times. Her first union representative was named Robin, but she added that “they got rid of her.” She recalled that other employees also went to union representatives and the Human Resources Department, but that nothing was ever done. She also added that some employees even went to Reilly, but Reilly never did anything. The next representative was Maryann Groninger, and Heitz explained that she would never have gone to Groninger with a problem because “she was one of Becky’s people.” Still frustrated with the hostility, Heitz stated she called a union representative in Levittown who put her in touch with a union representative from Harrisburg named Tom Tosti. She explained to Tosti that she needed to get out of the office, and had a meeting with Kiefer, Quinn, Reilly, and one other union representative. The meeting ended in yelling, but Heitz testified that she was able to transfer to the Health Department. She described the move as like “going from Hell to Heaven without making a pit stop.” Heitz stated she took a pay cut of several thousand dollars in the move, but that it was worth every penny.

Heitz testified that six months prior to her grand jury testimony, she disposed of all of the papers she had kept from her job at the Register of Wills in order to move on with her life. She explained that she kept copies of many of her probates to show what she had done and where supervisors had criticized her work.

Since leaving the Register of Wills, Heitz testified that she has not worked the polls or done anything political like stuff envelopes or help with buttons or mailings.

Testimony of Carol McGill

Carol McGill testified that she currently lives in Warminster Township, Bucks County. She testified that she worked at the Bucks County Register of Wills from 1973 until 1982 and again from 1999 until 2008. She stated that the reason she first left the job was to have children, and she left the second time due to stress from working at the office.

McGill testified that when she first began working at the Register of Wills in 1973, Thomas Welsh was the Register of Wills. His First Deputy was Thelma Simons, and the Second Deputy was Tilly Winton. There was only one administrator for the office, located on the Orphans’ Court side, whose name was Marie Care. She stated that Barbara Reilly had never worked at the office prior to being elected. McGill believed she worked as a Tax Collector in Bensalem.

McGill smiled when asked about the working environment at the Register of Wills in 1973. She stated she was hired as a probate clerk right out of high school, and she believed the fact that her father and family were political may have had something to do with her hiring. McGill stated she was never asked

about her political affiliation or activity during her interview with Welsh, but noted that her father was head of the Board of Elections at the time.

McGill described the environment at that time as “a nice place to work” with good office morale. She testified that there were never requirements that employees do political work, and could not recall if she was ever asked to work the polls. McGill did remember that they were never asked to stuff envelopes, go to Republican Headquarters, sign petitions, or go door-to-door while Thomas Welsh was the Register of Wills. She also noted that there was never a petty cash drawer or “change jar” at that time, nor did the office sell “family trees”. There was no “off-the-books” comp time. To her knowledge, employees never ran personal errands for Welsh, never picked up groceries, and never did anything unethical or illegal from 1973 until 1976.

McGill testified that when Barbara Reilly was elected, the First Deputy of the Register of Wills, Simons, retired because she felt Reilly wanted her to leave. The office environment remained good, however, until McGill left in 1982 to have children. McGill emphasized that she was not forced out, and that she was sad to leave, but she wanted to raise a family. She described her relationship with Reilly from 1976 to 1982 as cordial and the work was enjoyable.

McGill testified that when she returned in 1999, she was hired as a probate clerk again. The First Deputy was James McCullen, Sandy Pappert was the Second Deputy, and she believed that Kiefer had some kind of administrative position because she did not do much day-to-day work. McGill was interviewed by Pappert and McCullen, and was not asked about her political affiliation nor told that she would have to do political work. She believed they knew she did political work because she had worked at the office before and in the interim had worked at Voter Registration. She had not, however, worked the polls prior to 1999. McGill recalled that in 2003 Kiefer became the Second Deputy.

McGill testified that Kiefer was probably the person who told her about working the polls sometime in 2003. She noted that she was never given an option, just told when and where she was supposed to work on Election Day. She also recalled that they were told to stuff envelopes on their lunch break at Republican Headquarters, but that it ran over into work time on occasion. McGill stated that Kiefer asked her to look up voter registrations during work hours, saying it could be as often as every day, even though it was not part of her job description as a probate clerk. She was never asked to hand out literature at a train station, but she did have to sign petitions.

McGill testified that employees were never given an option to sign political petitions in the office. She explained that petitions for people running for office were handed around inside the office for employees to sign. McGill did not want to sign them because she knew it was wrong to do so in the office, but signed them anyway to “keep everything copacetic.” She stated that administrators punished employees by moving seats, making employees sit in the “bad girl” chair, shunning them, and not allowing other employees to speak to the employee. The “bad girl” chair was located directly in front of Sheila Bass’s desk. McGill recalled one instance in which she told administrators that petitions should be signed out in the hallway, not in the office, and they told employees not to speak to her. She also explained that the most difficult seat to have was the one in the front of the office because that employee was expected to man the counter and answer the phone first, in addition to their normal job duties. McGill stated that Kiefer, Bass, and eventually Quinn all moved employees’ seats.

McGill testified that there were other ramifications for employees who did not want to do political work and made their feelings known. For example, she stated that some employees were moved from the Register of Wills side to the Orphans' Court side of the office with lower pay because they did not want to have to do the political work. Another employee, Renee Chantelau, told the administration that she could not go door to door and register voters—that she did not want to do it. McGill recalled that Chantelau was “very upset about it. It wasn't something this girl wanted to do.” When Chantelau told an administrator this, “they made up a resignation for her to resign, and had her sign it.”

She first became aware of “off-the-books” comp time in 2003 when she was told that she would get comp time for working on Election Day, “especially if we were working for Rebecca.” Kiefer, Quinn, and Bass all said at various points that employees were not supposed to discuss “pink book” comp time. McGill could not recall having a specific conversation with Kiefer about the “pink book”. She worked both in Warrington for Kiefer's campaign, as well as Reilly's.

McGill also noted that she probably received “off-the-books” comp time when she stayed late on snow days. She explained that the Register of Wills had to be open even when other county offices closed for snow, so someone had to be in the office no matter what. She said that other employees would leave three or four hours early on snowy days and tell her, “We'll give you your time off, you know, any time you might need it.”

McGill was unsure at first whether she had ever used any illegitimate comp time. She then testified that some days she left early because of her “snow time” and put down the hours on a yellow sticker with her name. That was then recorded on the timesheet that employees signed in and out of every day and was given to Bass. McGill believed that these timesheets were eventually put into a computer and given to the Controller's Office. She did not know if they kept the written sign in sheets. McGill denied ever specifically asking for “pink book” time or “off-the-books” comp time, saying “it was a joke” about “pink book' time”, and “I really thought it was a joke. I mean, I didn't know.” She said the only way she even suspected it was real was because certain employees would come in late and not be marked as such, saying “you could just see there was special privileges for certain people.”

McGill testified that there were a few legitimate ways to get comp time. For example, if you worked on the weekends at things like Yardley Day, or if you had to stay late for a probate, any sort of work-related activities like these. To take legitimate comp time, employees used a formal request form through the county most of the time. Sometimes they wrote it on a sticky note. For the “pink book” time, employees would just use Post-It notes and write down how much time they were using. McGill continued to emphasize that any comp time she took came from “snow time.”

McGill testified that the office used a petty cash drawer that was kept next to the cash register when she came back to the Register of Wills in 1999—something she had not seen in her previous time at the office. There was also a jar that McCullen kept out to collect donations in exchange for lollipops that went to charity at the end of the year. She explained that the petty cash drawer was for the proceeds from the copier fees for which customers did not need a receipt. Whenever she saw \$10 or \$20 in there, she would ring it up in the register. McGill testified that she witnessed Kiefer take money out of the drawer to pay for her sodas or lunch. On one occasion, Kiefer asked McGill to take money out to go buy her a soda.

McGill testified that Kiefer asked her to run personal errands for her a few times during office hours. She stated that she had to leave the Register of Wills Office to take paperwork down to the Warrington Township building front desk a few times. She did not know if it was for Kiefer's job as Supervisor, but believed that it was not Register of Wills work because there was not anything at the Warrington Township building that had to do with her county business. McGill stated that she never witnessed or heard about employees picking up groceries or dry cleaning for Kiefer. She did recall that Lisa Harrigan did enough Warrington work that it would be fair to call her Kiefer's assistant. McGill added that Maryann Groninger was also asked to run errands to Warrington.

McGill also testified that the office started selling "family trees" around 2003 for a dollar at exhibits such as Yardley Day, though sometimes they were just given away. The money would be put into a bank zipper bag and taken back to the office. She never saw anyone access it and did not know what happened to it after the exhibitions. Kiefer determined whether they would be sold or given away. The office continued selling "family trees" at least until 2008 when McGill resigned. McGill stated she believed that Concetta Grunmeier was in charge of purchasing them because Grunmeier purchased supplies for the office, but she was not sure.

McGill denied that she was ever forced to attend political fundraisers for Reilly or Kiefer. She then testified that she felt like she did not have a choice of whether or not to attend, and bought tickets whenever she was asked. McGill then clarified and said "anyone has a choice, but to keep my job", she then corrected herself and said she bought the tickets to "keep the peace."

McGill also testified about a trip to Las Vegas that Reilly, Kiefer, Quinn, Bass, and Groninger took. Because there were so many employees out of the office, Jane Wenda had to do inheritance tax in addition to her normal duties. Wenda asked Karen, who was doing time sheets that week, if she could get overtime for doing the inheritance taxes. McGill noted that Karen was "buddy-buddy with Quinn" and she believed Karen called the administrators while they were on vacation in Las Vegas about the request. McGill stated that during the trip, Kiefer called her on the phone and told her to go out into the hallway to talk. Reilly then got on the phone and starting talking about how "she's not getting anything. and "this shouldn't have happened this way." Reilly then told McGill that she would be doing the inheritance taxes and that Wenda should stop. She later got a phone call from Reilly at her house where Reilly started ranting, saying, "How dare she thinks that she could tell us that she needs to be paid. How dare her. She's doing the job." McGill testified that this took place the summer before she took her FMLA leave, so probably in 2007.

Testimony of Constance Siracusa

Constance Siracusa testified that she works in Orphans' Court in the Bucks County courthouse as an assistant clerk. Kiefer, Quinn, Reilly, and Bass originally interviewed her. During the interview, she was not told about any outside duties she would have, nor did they ask about her political affiliation. Siracusa testified that she believed they already knew she was a Republican.

Siracusa stated that she began working in June 2007 as a per diem employee and was hired full-time as an archivist in August 2007. Approximately three to four months later, she was promoted to the position of assistant clerk. In May 2010, Siracusa transferred from the Orphans' Court and became a probate clerk. She currently probates wills and was trained by Sue Cummings, Pat Caimano, and several other clerks on the Register of Wills side of the office.

Siracusa testified that “pink book” time was “off-the-books” comp time given to employees for working the polls on Election Days. She explained that county employees have off on Election Days, but that “pink book” time was given so that they would be paid for the hours they spent working the polls. Siracusa stated that she first collected this type of comp time just after election season when Bass asked her how many hours she had worked at the polls. She added that at some point, Trisha Murphy started asking her how many hours she worked at the polls as well. Siracusa recalled that prior to the November 2010 election, nearly all employees worked the polls every election. However, starting with the November 2010 election, not many of the employees worked the polls. Siracusa did, however, because she wanted to. Siracusa insisted that it was not a requirement to work the polls, but conceded that “people would make sure that you were working the polls and ask you where you were working.”

Siracusa testified that she first learned what “pink book” time was when she ran out of sick time. She explained that she complained to one of the clerks in the office that she had a doctor’s appointment but no more legitimate sick time to take, and the woman replied, “Well, don’t you have “pink time”? Why don’t you use that?” Siracusa could recall the conversation, but not with whom she spoke. She stated that when she put in her time sheet requesting time off to whomever was doing payroll, she put a sticky note on the form indicating she wanted to use her “pink time” for however many hours. If approved, Siracusa would fill out her payroll form with her regular time so that she would receive a day’s pay when she used the “pink book” time. She recalled that to her knowledge, Colleen Strunk and Murphy handled office payroll. Siracusa stated she never took the comp time sheet to the managers for approval. To her knowledge, both sides of the office did payroll the same way, and either Murphy or Quinn showed her how to request “pink book” time. She added that for legitimate comp time, there was a separate comp time form to fill out that would be signed and approved by a manager.

Siracusa testified that she was unaware that she had 61 hours of “pink book” time. She estimated she took approximately three hours of “pink book” time in her three years there, primarily for doctor’s appointments. Siracusa insisted that it was only about three hours, and that she was never told how much she had accumulated.

Siracusa initially testified that she did not perform political work in the office. She was adamant that she never made political phone calls, handed out literature, or stuffed envelopes while at work. Siracusa then conceded that occasionally Maryann Groninger passed around petitions for state representatives at lunch for employees to sign. She stated she never saw anyone in Orphans’ Court doing political activities during work hours, and only heard about employees doing it on the Register of Wills’ side after the investigation began, saying “some of the girls said they did some work”, and naming Lisa Sutherland specifically as one of those women. She was unaware of any employees attending political fundraisers.

Siracusa testified that she never ran errands for any employees in the office, and then admitted that she once waited for a Comcast technician at Kiefer’s house. She stated that around 4:00 PM one Friday, Kiefer called her over and told her that there was a Comcast technician at her home and asked her if she was doing anything after work. Siracusa said no, so Kiefer asked her, “Would you mind going over to my house until my husband gets there?” She agreed. Kiefer also told her that Cindy Schrode was already at her house. Siracusa recalled that she left work at 4:30 PM, arrived at the house around 5:00 PM, and remained there until approximately 5:30 PM when Kiefer’s husband arrived. She could not remember if she signed anything for the Comcast technician. She stated she did not receive any overtime or comp time for house-sitting.

Siracusa testified that she was unaware of a “change jar” kept for making copies, explaining that on the Orphans’ Court side there was only a cash register. She also stated that the Register of Wills’ side had a steel “change box”, but she only became aware of it since the investigation began. Siracusa added that she did not know how it was used, but she did observe researchers place change on the counter.

Siracusa did testify that she was familiar with McCullen’s “change jar” that he gave to charity. She never witnessed anyone take money from it.

Siracusa denied that the Register of Wills has ever sold “family trees”. She denied ever seeing anyone sell “family trees”. She also testified that she did witness some mistreatment of employees. When asked to elaborate, she offered as an example an instance in which Quinn raised her voice at Maryann Groninger “loud enough for us to hear it” all the way over on the Orphans’ Court side. Siracusa conceded that occasionally there would be screaming arguments on the Register of Wills side of the office involving Quinn, Groninger, or Karen Uricchio. She also recalled one instance at the office in which Kiefer screamed at her for not attending an executive meeting at Republican Headquarters.

Siracusa testified that she did not vote in elections before becoming employed at the Register of Wills because she did not like politics. She explained that she votes now because she volunteered at local Republican Headquarters and felt she needed to do something because her sons were in Iraq at the time. She denied that anyone told her to change her party affiliation, and stated she changed her registration “just before I went for an interview.”

Siracusa testified that she is a committeewoman in Warrington Township, and that Kiefer is a Warrington Township Supervisor. She does not know if any other employees work as committee-persons. She denied ever seeing Kiefer or any other employees do work for Warrington while in the Register of Wills office.

Siracusa testified that she first learned of the investigation just before David Rouland contacted her in May or June. She could not recall exactly who told her, but stated that one of the other employees had previously received a call and that people had started talking about it at work. Immediately after she returned from speaking with Rouland, Quinn and Murphy questioned her in Barbara Reilly’s office about the meeting with Rouland. Siracusa recalled that they seemed to already know what the investigation was about, but asked her specifically about the “pink book”. She admitted to them that she told Rouland about the “pink book”, but testified that she told them nothing else because “it was supposed to be very confidential.” She could not recall if she told them anything else specifically.

Siracusa testified that since her conversation with Quinn and Murphy, no one else has spoken to her about the investigation. She stated her interaction with Barbara Reilly is purely as her boss and that recent interaction has largely been confined to inquiring about each other’s health.

Testimony of Lisa Sutherland

Lisa Sutherland is currently employed in the Bucks County Register of Wills and has been employed there for two years. Sutherland testified that she currently works on the Orphan’s Court side of the

Register of Wills Office working on marriage licenses. She testified that when she interviewed for the Register of Wills position, she interviewed with Barbara Reilly, Sheila Bass, Candace Quinn, and Becky Kiefer. She acknowledged that when she interviewed for this position, her political party affiliation was Republican. She explained that she was initially hired to work on the Register of Wills' side of the office, but her position was changed a couple of months prior to her testimony before this grand jury. She testified that Quinn and Kiefer told her that her position was changed for "cross-training" purposes. She testified that she believed that her position was changed because she voices her opinion often. She also testified that "they" think that she has something to do with giving information to this investigation.

Sutherland testified to working the polls. She acknowledged that she has worked the polls as a committeeperson for 25 years. She testified that while she was working at the Register of Wills, Quinn asked her what polls she was working. She said that after she worked the polls, she reported how long she worked them. She admitted that soon after working the November 2008 election polls, her co-workers approached her about "pink book" time. She testified to learning that "pink book" time meant "that we got paid extra time for working the polls. Well, time off." She explained that she received "pink book" time by putting in a request, putting "pink" on the request, and then requesting a period of time off. She said that "they" would come around and ask where they were working, how long they would be working, and then after the polls closed, they would ask how long they worked. She testified that Quinn approved the "pink book" time. She explained that the "pink book" was originally kept in Quinn's office and then it was given to Strunk. She testified that if Quinn was not in the office to approve the "pink book" time, Kiefer would approve it.

Sutherland admitted that employees in the Register of Wills Office felt obligated to work the polls. She testified that on one occasion she asked a few people to help her at the polls, but that those people said they could not help her because they "had to work other polls as per Becky." She recalled that fellow employee Connie Siracusa was supposed to work the polls with her, but Siracusa told Sutherland that she could not because "Becky told her to go to a different poll." She testified that Sutherland ended up working the polls in Warrington where Kiefer is a Supervisor. Sutherland testified that Siracusa told her that she worked the polls for Kiefer because she did not want to get into any trouble. Sutherland further explained that she spoke with her fellow employees about working the polls and found out that they felt that it was "mandatory" or "part of their jobs" to work the polls. She stated that she did not think that other employees felt comfortable saying "no" to the assignments given to them by Kiefer and Quinn. She explained that she believed that the employees felt that their jobs "would have been jeopardized or just living hell."

Sutherland testified that McCullen, Bass, and Murphy, are currently running the office. She explained that before the current administration, Kiefer, Quinn, Murphy, and McCullen ran the office. She testified that they did not treat their employees with respect. She explained that she and other employees were "screamed at" in front of the other employees by Kiefer and, once in a while, by Quinn. She testified that she saw employees cry or break down after they screamed at them. She testified that she was also screamed at and that her desk was moved often.

Sutherland testified that she is aware of the "change box" in the Register of Wills Office. She explained that when people came into the office to make copies, it would cost a quarter if the individuals made the copy themselves and it would cost a dollar if a Register of Wills' employee made the copy. She testified

that if the individuals did not want a receipt for their copy, the money went into the "change box". She said that she saw Kiefer use the money in the "change box" for her own personal use. She said that she saw Kiefer go into the "change box" whenever she was in the office. She testified that Kiefer would use the money in the "change box" for soda and also ask others if they wanted a soda. She testified that she heard that Quinn would use the money in the "change box" to get lunch and soda. She testified that she never saw them put the money back into the "change box". She said that she never saw the money from the "change box" rolled up or deposited and that she never saw the money taken to the bank. She admitted that a few times, she saw the change from the "change box" dumped into a file cabinet in Quinn's office.

Sutherland admitted that she was aware of people in the office running personal errands for Kiefer. She said that Cindy Schrode would run personal errands for Kiefer, including picking up vegetables for her and waiting at Kiefer's house for the Comcast cable person. She testified that Schrode would run errands for Kiefer at least once a week. She testified that after running these errands, Schrode went home early. She testified that she assumed that Schrode was being paid for the whole day when she ran these errands.

Sutherland admitted that she used "pink book" time. She acknowledged that she thought that she used more than 55 hours of "pink book" time because she worked the polls all day, every year. She acknowledged that she would take off from work on the anniversaries of her mother, father, and brother's deaths and that she also did not work on their respective birthdays. She explained that if her paycheck shows that she worked on those days, then she took "pink book" time on those days. She testified that the last time she checked, she had six hours of "pink book" time left. She testified that she used two of the hours and then asked to use more, but was denied the use of the remaining hours because they had taken the "pink book" time away. She testified that Quinn told her there was no more "pink book" time. She estimated that they took the "pink book" time away some time before the Primary Election in May 2010. She testified that she heard a co-worker say that she was not going to work the polls this year because she would not be receiving "pink book" time for it. She testified that she thought that the "pink book" time was something that the county did. She then testified that she was not aware of any other Row Office using "pink book" time or "off-the-books" comp time.

Sutherland testified that she was not called into the offices by any of the Register of Wills' administrators about this investigation. She admitted that prior to her interview with David Rouland, Quinn told her that she did not have to answer his questions if she did not feel comfortable. She also admitted that Quinn told her that she had to "protect" Reilly. She testified that after her interview with Rouland, she was not called into the offices by administrators, but that she saw every other employee, except Donna Hampshire, go into the offices after their interviews with Rouland.

Sutherland testified that she was aware of people doing political work in the office. She testified that she saw Quinn and Schrode make flyers. She testified that Quinn would mostly be making telephone calls in the office and asking other employees if they could help with James McCullen's and Mike Fitzpatrick's campaigns. She testified that Quinn gave out telephone lists to employees so that they could contact people on behalf of the campaigns. She testified that she saw people leave the office during lunchtime to stuff envelopes at political headquarters.

Sutherland admitted that she was aware of Quinn, Kiefer, and Schrode handing out political literature at train stations. She testified that they would hand the political literature out in the morning and then come into work late. She testified that she was aware that Shawn Rose campaigned for Jim McCullen and received comp time for it. She said that Rose is the father of Quinn's grandchild. She testified that she was also aware that Rose received comp time for moving furniture for Kiefer at her home. She testified that Rose bragged about receiving comp time for moving furniture.

Sutherland testified that Kiefer also asked her to pick up some street addresses for Election Day from the Board of Elections. She said that she asked Kiefer if the street addresses pertained to the Register of Wills and Kiefer said that they did not. Sutherland said that she refused to get the street addresses and she was told to sit down and her desk was moved. Sutherland said that Kiefer did Warrington Township "stuff" every day when she was in the office. She testified that she saw Warrington Township fliers or documents all over the office in file cabinets. She testified that she took photos of the Warrington Township materials that were on Kiefer's desk. She acknowledged that the Warrington Township fliers and documents are not in the office now. She testified that the fliers and documents were moved some time before this investigation began.

Sutherland said that some of the fliers were taken out of the office and the rest were shredded. She testified that around mid April 2010, she heard shredders going and filing cabinets opening "for days." She testified that this shredding is not normal activity in the office. She said that she saw Quinn and Kiefer doing the shredding. She said that she also saw Dorothy Einhorn helping with the shredding. She acknowledged that she saw boxes and documents going out of the office around the same time she saw the shredding occur. She said that she also saw Margaret Swartz helping shred documents and carry out boxes. She admitted that she saw Murphy and Swartz working on Kiefer's computer. She said that she heard that they were downloading on disks.

Sutherland testified that Quinn has made threats since this investigation began. She testified that Quinn said in an office meeting that she will "find out who started this and cause problems with her and her family and they will pay." She said that Quinn also said that it was their "job to make her happy and whoever did this to her and her family will pay and she will find out." She testified that Reilly also said that she "will find out her accusers and they'll see what happens."

Testimony of Cynthia Schrode

Cynthia Schrode is currently employed in the Orphan's Court division of the Bucks County Register of Wills and has been employed there for three years. Schrode testified that she interviewed for the job with Reilly, Kiefer, and Bass. Schrode indicated that when she interviewed for the position, they told her what would be expected of her while working for them. Schrode testified that when she interviewed, there was no discussion about her doing any poll work or political work. Schrode acknowledged that when she interviewed for this position, her political party affiliation was Republican. Schrode also admitted that after she was hired, she became a CommitteePerson for the Levittown, Indian Creek area.

Schrode acknowledged that there were two types of comp time available when she worked for Orphan's Court. She testified that the "on-the-books" comp time was for events that were held for the public's interest, such as seniors' events. She said that when she went to these events, the comp time was

reported in their payroll book. Schrode indicated that management knew who was working these events. She identified the management as Bass, Kiefer, and Quinn.

Schrode testified that the second type of comp time was used for working the polls. She claimed that she was not told by anyone to work the polls. She said that she worked her own polls and "would always work" in her home area. She admitted that at some point, someone could have asked her about the amount of time that she worked at the polls. She testified that "they" knew from start to finish when she worked the polls with McCullen. She said that she talked about the amount of time she worked the polls with her co-workers. She indicated that she did not know who "physically kept" the "pink book."

Schrode admitted that she used "pink book" time. She testified that it was a "shocker" to her to find out that she had acquired 52 hours of "pink book" time since 2007. She admitted using the "pink book" time for doctor's appointments. She said that she did not know how much of the "pink time" she took over the past three years, but that she "probably took a lot of it maybe." She stated that her "normal time" would be filled out on a calendar kept on a clipboard in the office, but that the "pink book" time was filled out on a different sheet to be approved by management. She explained that she reported using the "pink book" time by filling out a time-off slip, but that she would not include the words "pink book" on the slip itself. She testified that after she filled out the slip, she handed it in and the slip was then handed back to her after it was entered into management's calendar. She explained that when she handed in the slip, she would tell whoever was doing payroll at the time that she would like to use "pink book" time. She said that Strunk, Quinn, Murphy, and Uricchio have all done payroll at times. She admitted that "pink book" time would have to be approved by the management.

Schrode testified that she knew that other people in the office would go to Republican Headquarters during their lunch break. She indicated that a "random" person from the office would go over to Republican Headquarters, pick up boxes of envelopes to stuff, and that if people wanted to do it, then they would take them home. She admitted that she was given petitions to take home and fill out. She admitted that management "might have" given her petitions to take home and circulate. She also acknowledged that she took petitions home on her own. Schrode testified that Kiefer told her to make labels for the Warrington Township Republican Party. She said that she made the labels at "random," "off and on" and that she "could have" printed the labels for Kiefer once or twice a month. She admitted that she made the Warrington Township labels for Kiefer, on county time, while she was in the Register of Wills Office.

Schrode testified that there was a "change box" in the office and that it was used for copies. She testified that the "change box" is no longer in the office. She said that when she came back to the office after being out on disability, she saw a sign that said, "If you are going to make copies, please obtain a receipt. Do not leave quarters on the counter." Schrode explained how the "change box" worked. She testified that if someone wanted to make copies, then they would leave the change on the counter and the change would be put into the "change box". She acknowledged that there were two different prices for making copies. She explained that it would cost a quarter if the individuals made the copy themselves and it would cost a dollar if a Register of Wills' employee made the copy.

Schrode admitted that she and her co-workers used the change in the "change box" to make change. She stated that if she put a dollar in the "change box" and took four quarters out of it, she had another

person there to witness it. She testified that she was told by Kiefer to take a dollar and twenty-five cents out of the "change box" for a soda and that she did not see Kiefer put the money back into the "change box". She testified that she did not recall if Quinn ever asked her to take money out of the "change box". She said that she did not see what happened with the change in the "change box" at the end of each day, but she recalled seeing Einhorn roll the money up at certain times.

Schrode acknowledged that McCullen also had a coin jar. She testified that McCullen's coin jar was a donation jar for lollipops that he bought and she believed that the proceeds from McCullen's jar went to the Red Cross. She testified that she thought that Quinn was the person who ultimately collected the money from the jar to give to the Red Cross. She admitted that she saw people make change from McCullen's jar. She testified that "the same money was put in as came out" of McCullen's jar. She stated that she never saw anyone in the office sell "family trees". In her experience, making "family trees" was always a service provided to customers. She testified that she "just assumed" that other people in the office got and took home petitions.

Schrode testified that she would assume that Reilly and Kiefer would do background checks of employees. She admitted that she found out later that they would look up employees' voter registration information. She testified that she saw co-worker Carol McGill, looking up voter registration in front of her. She testified that she asked McGill if she had looked up Schrode's voter registration and McGill replied that she had looked it up. She said that she was sure McGill told her that someone told her to look it up, but that McGill did not tell her who told her to look it up.

Schrode testified that she has given Quinn rides to work, but she could not recall how many times. She admitted that she would arrive to work late when giving Quinn a ride to work and still get paid for the whole day. She testified that one day, Kiefer told her to go to Kiefer's house and wait for a Comcast cable person. She admitted that she "always" did what Kiefer told her to do. She testified that while she was waiting for the Comcast cable person at Kiefer's house, she had to leave because her grandmother became ill. She said that she called Kiefer to tell her that she was leaving because her grandmother was ill and that Kiefer told her to go. She testified that she heard that Connie Siracusa had replaced her at Kiefer's house that day. She admitted that she thought that she got paid for a regular day's work that day.

Schrode acknowledged that she heard rumors about who would run for the Register of Wills Office. She testified that she heard rumors that Kiefer, Strunk, or Sutherland would run for Register of Wills. She stated that Reilly was in the office "a lot" the first couple of years that Schrode worked there. She said that she could not say how many times Reilly was in the office over the past year, year and a half. She testified that she spoke with Reilly just prior to testifying before this Grand Jury, but that they only spoke of their respective physical conditions. She testified that she was contacted by Peggy Swartz about investigator David Rouland. She testified that Swartz told her that an investigator would be calling and that Swartz told the investigator that she was going to share the information and questions that he had asked. She admitted that Swartz told her some of the questions that Rouland asked her, but she did not think that Swartz told her any of the answers she gave Rouland.

Schrode initially testified that Murphy and Bass did not tell her how to answer or respond to any of the questions asked by the investigator or in this Grand Jury. Schrode then testified that they told her to "answer everything truthfully." She testified that she had a conversation with Reilly about this investigation. She said that she called Reilly and told her about her interview with the investigator. She

testified that in her complete conversation with Reilly about this investigation, she apologized to Reilly for not being able to answer the investigator's questions because she was "heavily medicated" at the time. She stated that Reilly did not ask her anything about the questions being asked by the investigator and that all Reilly said to her was "don't worry about it."

Schrode admitted that she met with Reilly socially, outside of work. She said that the last time she met Reilly socially was approximately a year ago, at a concert. She stated that Quinn and Kiefer were also at this concert. She admitted that she saw Reilly in the nursing home while Schrode was out on disability. She said that she did not speak about the investigation with Reilly while in the nursing home and that they only spoke about Schrode's physical condition. Schrode acknowledged that she met with Bass, Reilly, Kiefer, and Quinn outside of work, at political events. She admitted that she was recently at a birthday party for Quinn's granddaughter. She testified that she and Quinn are family friends. She said that she did not speak with Quinn about this investigation at the birthday party and that they talked only about family. She indicated that after this investigation began, Quinn advised her to tell the truth. She then stated that she did not speak to Quinn about this investigation and that they "speak about family."

Schrode admitted that prior to the start of this investigation, she was told not to speak about the "pink book" outside of the office. She acknowledged that "anyone" in the office would have told her not to speak about the "pink book" time and that they "just didn't talk about it." She stated that she did not remember who first told her about the "pink book." She said that she believed that Kiefer told her not to speak about the "pink book" time. She testified that she had not talked to Kiefer in a "very long time." She then said that the last time she spoke to Kiefer was approximately one week prior to her testimony before this Grand Jury when Kiefer called the Register of Wills Office looking for Sheila Bass. Schrode testified that she has had some conversations with her co-workers about this investigation. She stated that she would not give names, but that the consensus in the office was that "nobody really knew what the investigation was about."

Testimony of Yolanda Bencoter

Yolanda Bencoter is currently employed in the Orphan's Court division of the Bucks County Register of Wills and has been employed there since September 2007. She testified that she interviewed for the job with Reilly, Kiefer, and Bass. She testified that when she interviewed for this position, her political party affiliation was Republican. She testified that she is currently employed by the Register of Wills as an accountant. She explained that her current duties consist of handling the cash receipts for the office, keeping records of the cash receipts and expenses, and reporting them to the Controller's Office.

Bencoter testified that in her current position, she deals with the finance records of both the Register of Wills and Orphan's Court offices.

Bencoter testified that she currently sits in the Archives Research Center section of the office. She stated that she sits near Einhorn. She stated that her desk is neither in the Register of Wills nor the Orphan's Court side of the office. She acknowledged that she is aware of the "change box" that was located on the Register of Wills' side of the office. She stated that the "change box" has been there since she began employment, but that it is no longer there. She said that the "change box" stopped being used in June 2010. She explained that the "change box" was used when they received money from people for

copies. She testified that people would place change on the counter for copies and they would pick up the quarters and put the quarters into the "change box".

Benscoter acknowledged that there were two different rates for making copies. She explained that it would cost a quarter if the people made the copy themselves and it would cost a dollar if a Register of Wills' employee made the copy. She testified that if the person did not want a receipt, then the money for the copy would go into the "change box" and if the person wanted a receipt, then the change went into the register. She said that she did not see where the money from the "change box" went. She recalled one instance in which she saw Lisa Sutherland take change from the "change box" to purchase a soda. She could not recall whether Sutherland repaid the "change box".

Benscoter acknowledged that she would report the money in the cash register to the Controller's Office. She explained that she would collect the cash receipts from the register on a daily printout. She said that at the end of each month, the printouts were collected and reported to the Controller's Office. She indicated that they then sent a check in the amount indicated on the printouts to the county and to the state. She testified that she did not know what happened to the money in the "change box". She said that Einhorn handled the accounting of the cash registers at the end of every day. She testified that she did not know where the money from the "change box" went. She stated that she never saw the money from the "change box" appear on the deposit slips that were reported to the Controller's Office. She testified that the "change box" is no longer used and now all of the money is placed into the cash register and reported to the Controller's Office. Benscoter admitted that she has noticed an increase in the amount of monies received in the register since the "change box" has not been used.

Benscoter testified that she is aware of "pink book" comp time. She said that it is not actually a "pink book," but described it as a binder with pink sheets inside of it. She testified that she became aware of the "pink book" when "they" asked her if she worked the polls. She acknowledged that prior to working for the Register of Wills, she worked the polls once or twice. She testified that since working for the Register of Wills, she has consistently worked the polls. She said that Bass asked her if she had worked the polls and she reported the number of hours she worked at the polls on Election Day to Bass. She said that she also reported the number of hours she worked at the polls to Strunk. She admitted that she has taken "pink book" time, but that she did not know how much "pink book" time she took.

Benscoter said that it was strongly suggested that she work the polls. She testified that Bass strongly suggested that she work the polls. She acknowledged that working the polls was an "overall conversation" and that "they" would "kind of encourage" you to work the polls. She explained how "pink book" time was reported. She said that if she worked three hours the first November, then she would tell them that she worked three hours and they would record it in the book. She testified that she would use the time, say an hour for a dentist appointment, and they would take the time off. She admitted that this was not recorded on the payroll. She also admitted that the "pink book" time would show up as normal time, as if she had worked that hour.

Benscoter acknowledged that different people have been in charge of payroll. She testified that Murphy and Strunk have been in charge of payroll at times. She explained that they would write their times on sheets of paper. She testified that the "pink book" time was not filled out on these sheets and that they would just tell Bass or Strunk about the "pink book" time. She admitted that if she told Bass or Strunk that

she was taking "pink book" time, she was always approved for it and that she has never been denied "pink book" time. She testified that she has at times refused "pink book" time. She said that she has refused it on those occasions when she served at the polls as Majority Inspector and was thus paid by the Board of Elections. She did not think it was right to take time from the job as well when she had been paid. She testified that she stopped using the "pink book" time either in November 2008 or May 2009 and could not recall if she had used all of the "pink book" time she had accumulated.

Benscoter testified that she was not aware of anyone doing any political activity in the office. She explained that her desk was in a separate office and she was not intermingling with people as much. She recalled that Maryann Groninger had her sign a sheet when Groninger ran for State Committee. She also recalled Schrode doing "some kind of papers for someone" while she was working in the office. Benscoter admitted that while she was in the office, she was aware that other employees were being mistreated. She said that Reilly would not come to the office every day. She estimated that Reilly was in the office maybe once or twice a month. She explained that when she first started in September 2007, Reilly was in the office approximately five to eight times a month. She indicated that she has not heard Reilly say that she is going to "get the persons regarding this investigation." She said that she has heard Strunk, Sutherland and Knox, say that Reilly is going to "get the persons regarding this investigation." She testified that there is now a policy in the Register of Wills where employees must sign in and out on a clipboard when they leave the office for any reason, including going to the bathroom.

Benscoter testified that she was contacted by investigator David Rouland some time in June or July of 2010. She said that prior to hearing from Rouland, she knew that something was not right because "they were like shredding papers." She testified that it was determined that the shredding took place on Friday, May 14th. She admitted that she saw Quinn shredding papers. She testified that she could hear the shredder constantly shredding throughout the day. She said that she did not see anyone else involved in the shredding.

Benscoter admitted that she has been brought into the office by management to talk about the investigation. She testified that Quinn pulled her and other employees into an office at the beginning of this investigation. This happened after Benscoter had spoken with investigator Rouland. She testified that Quinn told them what to say if they were questioned by an investigator. She said that Quinn told them to tell the investigators that they did not know anything about the "pink book." She stated that Susan Toal, Connie Siracusa, Eileen Aiken, Patricia McNeil, and Murphy were in the meeting when Quinn told them to say that they did not know anything about the "pink book." She testified that there were other meetings held, but that she was not in those meetings. She said that she heard that different people were told to do different things in these meetings. She testified that she heard from others in the office that people were told not to say anything about what they did for Kiefer. She recalled an incident where the investigator called for Einhorn and they told her that she should not go to the investigator. She recalled that Quinn got on the phone and told them that Einhorn was not coming.

Benscoter admitted that she saw that people were being pulled into the office after they talked with investigator Rouland. She testified that she was pulled into the office and questioned by Quinn. She testified that Quinn asked her what she and the investigator discussed. She said that she did not get into any type of detail with Quinn, but she told Quinn that the investigator asked about the "pink book" and about additional probate. She said that Murphy may have been in the room with her and Quinn during

this discussion. She testified that it was usually Murphy and Quinn pulling people into the office after they had been interviewed by investigator Rouland. She recalled that Kiefer may have been involved in these meetings. She testified that she saw Schrode called into a meeting with Murphy and Bass after Detectives Greg Langston and Terry Lachman had interviewed her.

Benscoter acknowledged that others in the office have been told not to speak with Strunk. She said that people in the office were told by Bass not to interrupt Strunk when she was working on a project. Benscoter stated that Quinn told her not to speak with Strunk. She said that Quinn also told her "to tell everyone not to talk to me." She testified that Quinn and Kiefer tried to "control the office" when they were out of the office. She stated that Kiefer resigned on August 15, 2010. She testified that after Kiefer's resignation, Kiefer was still in the office. She said that Kiefer was in the office around the time the computers were taken out of the office by County Detectives. She testified that Kiefer was still in the office two weeks prior to Benscoter's testimony before this Grand Jury which was on September 16, 2010.

Testimony of Dorothy Einhorn

Dorothy Einhorn testified that she has worked at the Bucks County Register of Wills for the past eight years, but claimed she does not know many of the people in the office. At the time she was hired, Reilly, McCullen, and Pappert interviewed her for the position of probate clerk. She is currently the records coordinator and an accountant for the office in charge of daily deposits. Einhorn is a registered Republican.

Einhorn testified that she saw various people doing political work at the Register of Wills during her employment, including: Jane Wenda, Maryann Groninger, Kiefer, and Quinn. These activities included signing political petitions and other work stemming from Kiefer's position as Warrington Township Supervisor. According to Einhorn, Kiefer kept a file cabinet in the Register of Wills dedicated to Warrington Township, but Einhorn did not know specifically what was contained therein.

Einhorn also testified that there was a system of "off-the-books" comp time given to Register of Wills' employees that worked the polls on Election Day. She recalled that Pappert originally informed her of it and told her that people outside of the office were not supposed to know about it or the "pink book" in which the comp time was recorded. Einhorn stated that all of the administrators, including Kiefer, Quinn, Bass, McCullen, Luce, and Murphy knew about the "pink book".

Einhorn also testified about how the comp time worked. Before each Election Day, either Kiefer or Bass would ask when everyone was going to work the polls. It was Einhorn's understanding that everyone was expected to go. After each Election Day, Einhorn submitted the hours she had worked on a Post-It note to Bass, Urrichio, Strunk, or Swartz. She was told to use a Post-It in order to avoid leaving a paper trail of the comp time. This "off-the-books" comp time never appeared on Einhorn's paychecks, and Einhorn was paid regularly for the hours during which she used her comp time. These hours were then recorded in a "pink book", though Einhorn stated she never saw her pages in the book. She estimated that she had accumulated 35 hours of comp time in eight years. No one ever told her she had used up all of her comp time. Einhorn also testified that Reilly knew that the staff worked the polls.

Einhorn testified that one of the administrators would have to approve any use or credit of the “pink book” comp time, usually Quinn or Bass. She did not know who was in charge of the “pink book” or where it was kept. Some time before the May 2010 Primary Election, Quinn informed the employees that there would be no more “pink book” time.

Einhorn also testified that there had been a document-shredding “party” in the office that Quinn referred to as “spring cleaning”, and recalled that it took place sometime after word got to the office about the investigation. Quinn took three boxes of political literature to Einhorn’s office to be shredded, but when Einhorn had only shredded a box and a half of them, Quinn removed the remaining boxes. Einhorn stated that she did not know what else went on that day regarding shredding, that she did not see Quinn with a shredder, and did not see anyone else shredding. She added that she works in the back of the building with a poor view of the office. Later in her testimony, Einhorn conceded that Kiefer also performed shredding of documents that day.

Einhorn testified that she was in charge of depositing money from the office “change jar” into the county account for county use for several years. The money was accumulated in the jar by charging people for making copies of various documents. She never witnessed anyone take money out of the jar for sodas or lunches, but said that occasionally someone would make change while another employee watched. About once a week, Einhorn would empty the jar and deposit the money. In the middle of 2009, Kiefer and Quinn told Einhorn to start placing quarters and large bills in Quinn’s file drawer, but to continue depositing some of the money. Einhorn estimated this amounted to about forty dollars a week, but later in her testimony she said it was about forty dollars per month and that sometimes twenties or fives were included. When pressed, Einhorn claimed she had no idea how much money she put in Quinn’s drawer. She admitted that she told detectives she would leave ten dollars in the jar to be deposited and put the remainder in Quinn’s desk.

Regarding the “change jar” money, Einhorn also testified that Quinn told her, “what happens with this drawer is between you and me.” Einhorn stated she did not know what happened to the money that she put into Quinn’s file drawer, but that she herself never deposited it and that the drawer emptied itself. She added that she makes all of the deposits in the office because she is the one authorized to do so on behalf of the Register of Wills. Einhorn recalled that the money in Quinn’s drawer was used to buy office paper at least once, and that it was occasionally used to send flowers to someone who was sick. She also stated that Quinn stopped all use of the “change jar” in June 2010.

Einhorn testified that at the first Grange Fair she worked at for the Register of Wills, they sold “family trees” for one dollar. Now, however, they are given away.

Einhorn could only recall one incident in which a Register of Wills’ employee was mistreated. In 2009, Quinn and Urrichio argued, and the next day there was talk in the office that Urrichio had suffered a stroke. Einhorn emphasized that she does not really know any other employees. When questioned further, she conceded that Jane Wenda had been reduced to tears at work once, but she could not recall who had screamed at Wenda or what the situation was about. Einhorn also saw employees’ chairs and desks moved around the office, but did not know why. She recalled that on one occasion in 2008, Quinn yelled at her in the office for wanting to go to her husband’s doctor appointment instead of working the

polls. Einhorn ended up working the polls that Election Day. After that point, she believed that working the polls was mandatory for all employees and that there would be repercussions for those who did not.

Einhorn initially testified that she never heard Reilly mention anything about the investigation and that no one ever spoke to her about the investigation. Later in her testimony, however, Einhorn admitted that Reilly was angry about the investigation and that she had heard Reilly say she was “going to get the rats.” She added that there is a rumor in the office that Reilly believes Sutherland or Strunk sparked the investigation. Einhorn also admitted that Quinn and Kiefer had spoken to her regarding the investigation and that they seemed pleased that she had initially lied to investigators.

Einhorn also testified that Quinn asked her to lie to the investigator, David Rouland, and tell him that there was no such thing as a “pink book”. She could not recall if Quinn told her to lie about anything else. After her interview with Rouland, Quinn pulled her into Reilly’s office and asked her what they spoke about. Einhorn added that Kiefer was also present when Quinn questioned her. Einhorn testified that she told them everything she discussed with Rouland, and that when she was finished Quinn told her not to speak to Rouland again. She noted that Kiefer and Quinn seemed particularly interested in questions about the “pink book”, the “change jar”, and the political literature in the office. She admitted that she originally lied to David Rouland during the investigation and denied the existence of the “pink book”.

Einhorn denied that anyone at the Register of Wills had contacted her about either her grand jury testimony or her interview with county detectives. Later in her testimony, Einhorn stated that Bass spoke to her after her interview with the detectives, but denied that Bass asked her about the interview itself. Einhorn then admitted that Bass had indeed asked her about the interview, and seemed concerned about the “pink book”.

Finally, Einhorn testified that her husband has medical problems and that she is afraid of losing her job.

Testimony of Susan Cummings

Susan Cummings testified that she began working at the Register of Wills in Bucks County on May 11, 2009. Cummings stated that Reilly, Kiefer, Bass, and Quinn interviewed her for the position of probate clerk. They did not tell her that part of her job would be to work the polls on Election Days. Cummings explained that there was some difficulty trying to get her sworn in as a probate clerk because Reilly was not in the office often enough. She estimated that before the subpoenas began, Reilly was in the office a total of six times since she began working in May 2009. Since subpoenas came down from the Controller’s Office, Reilly has been in the office four times. Cummings also stated that she has always been a registered Republican and has been politically active as Neshaminy School Board Director for the last six and a half years.

Cummings testified that before the 2009 General Election, Murphy asked her if she would be working the polls. She stated she would be, because she knew someone running for school board director. After the election, Murphy asked her how many hours she had worked. Cummings told her approximately ten hours. Cummings stated that later several other employees explained the “pink book” comp time system to her. She herself has never seen the “pink book”.

Cummings explained that to get “pink book” time approved, she would submit a request form two days before she wanted to take time off. Before the subpoenas were handed out, and prior to some employees leaving the office, Cummings testified that she would go to Quinn to use her “pink book” time. Now, however, she goes to Bass. Cummings also stated that in May, just before the Primary Election, Murphy told several employees that there was no more “pink book.”

Cummings testified that she did not know where the personnel files were kept nor did she see anyone take them, but she guessed that Strunk might have kept them. She also recalled that Strunk was the head of payroll when she began working there. Cummings stated that she did see Quinn take the requests for time off and “pink book” time from Strunk’s desk the day after subpoenas came down from the Controller’s Office. She did not hear any conversation between the two when Quinn took them.

Cummings testified that Quinn’s “daughter’s baby’s dad,” Shawn Rose, worked in the office for a time as a per diem employee. She stated that she “absolutely” knew what type of work he did. Most of the time, he watched cartoons on his work computer. Cummings also recalled that Rose often came in late with Quinn, but marked himself in at 8:00 AM, and was paid for days that he did not show up for work. She also heard from other employees that Rose was given comp time for moving Kiefer’s furniture.

Cummings also testified that Kiefer frequently performed political work for Warrington Township in the office. She estimated that Kiefer spent sixty percent of her time on the phone, printing materials, or making booklets relating purely to Warrington Township politics. Kiefer also made employees work on booklets pertaining to Warrington Township politics. Cummings testified that she also witnessed Quinn and Groninger putting together packets of phone lists that were then given to employees. Included in these phone lists was a script of what to say on the phone call, but no one was told to make the calls during work time.

Cummings testified that on one occasion she was instructed to pick up political signs and give them to Quinn. She was also aware of Schrode being sent to wait for the cable man at Kiefer’s house. Other times, Cummings stated that Kiefer made employees take her to the train station. She also recalled that Groninger was sent to pick up a box from Quinn’s husband in Newtown, and that Pat Caimano was asked to knock on doors with Quinn and Kiefer. Cummings added that Groninger circulated her own political petition around the office for employees to sign.

Cummings testified that Kiefer, Quinn, Murphy and Bass mistreated several employees at the Register of Wills. She stated that within her first month working in the office, Karen Urrichio had a stroke caused in part, Cummings believed, by stress in the office. While Urrichio was out of the office, Cummings stated she witnessed Quinn pulling files out of Urrichio’s filing cabinet and Murphy taking things from Quinn’s computer. She did not know the reason, but recalled that the whole process took hours.

Cummings also testified as to the use of the “change box” in the office. She explained that customers would leave money on the counter when they made copies, and that most of the money was put into a box on the left side of the register. She did not know what happened to the money in the box, but she did witness Kiefer and Quinn take money out for the vending machines. She never witnessed them return any money. At one time, Cummings saw a twenty dollar bill in the “change box”, and Diane Bochenek

told her that she was instructed to put the money in there. Cummings stated that she always rang up any money she handled in the cash register.

Cummings testified that she was never aware of "family trees" being sold by the office, but did know that they are now given away. She added that they are not popular with customers.

Cummings testified that just before the Primary Election in 2010, Quinn shredded a large number of documents. She stated that Quinn took a "very large" shredder into Kiefer's and Reilly's offices, opened up various filing cabinets and shredded documents. Cummings recalled that Quinn "made it very obvious. what she was doing. She also saw Murphy copying things from various computers onto blank CDs. Cummings stated that Kiefer asked her to empty two of her filing cabinets into boxes that Bass then labeled and removed from the office.

Around the first week of June, Quinn told the employees that there would be some office-cleaning going on. Cummings testified that the first Wednesday of that month, Quinn had Groninger and Pat Caimano cleaning out boxes and a closet filled with various event information and pamphlets. Cummings also stated that Groninger was working overtime every night because, as Bass explained, she was doing "special projects. for Reilly.

Cummings testified that right now, Bass is running the office on the Register of Wills side, and Murphy runs the Orphans' Court side. She added that Reilly calls Bass several times a day, and almost always on Bass's cell phone. When Reilly calls Bass's office phone, she is always diverted through the main line. Cummings explained that while Reilly is on the phone with Bass in the office, Maryann Groninger whistles loudly, sings, and talks to herself, always stopping when the phone call ends. Just prior to her grand jury testimony, Cummings overheard a phone call in which Bass told Reilly that Einhorn testified first and that Bass went second. She did not hear Bass say anything else regarding the grand jury. Cummings also testified that she has previously heard Bass talking to Reilly about Kiefer's phone and about the Second Deputy position in the office.

Cummings testified that when Bass went on vacation, Quinn called a meeting via speakerphone and stated she "did not want" Strunk or McCullen running the office, that no one should speak to Strunk, and that Strunk's desk should be moved. Quinn emphasized that these instructions were all per Reilly. Cummings testified that she herself has had seven different desks in the time she has worked at the Register of Wills, including her current desk, which is situated in front of Kiefer's office.

Cummings testified that the day before her grand jury testimony, Reilly called her and said she "felt bad" that she never got a chance to say hello, that she was very busy, had health issues that kept her out of the office, and that perhaps Quinn had caused a few problems. Cummings stated that Reilly asked her about Quinn's speakerphone meeting, and Reilly claimed she "had no knowledge" of what had been going on in the office. In response, Cummings told her she should be embarrassed about the way the office was run. Reilly had no reply to this statement. Reilly also asked her when she was going to speak to detectives, and Cummings told her that she already had and would be testifying to the grand jury next. Cummings testified that she has never spoken to Reilly before this phone call.

Cummings testified that no one ever told her what to say to detectives or to the grand jury. However, after she spoke with the Controller's Office, Quinn and Murphy brought her into an office where Reilly was on speakerphone. Quinn asked her what the Controller wanted to know and how Cummings had answered. Cummings testified that she gave them a brief description of the questions and her responses. They did not say whether or not she should speak to investigators again. She did recall however that Quinn told Einhorn not to speak with David Rouland again.

Cummings also testified that after the subpoenas were handed down, Quinn said that she would "get even" and that "no one messes with herself (sic), her family or her friends."

Testimony of Maryann Groninger

Maryann Groninger testified she has been employed at the Register of Wills for nine years. Prior to her employment there, she worked at the Clerk of Courts for one year. She currently works on inheritance tax and the probate of wills. Luce, Reilly, and Kiefer interviewed her before she was hired. At the time, Reilly was Register of Wills, Kiefer was Second Deputy, Luce was Orphans' Court administrator, Pappert was Register of Wills administrator, and McCullen was First Deputy. Pappert was her direct supervisor when she was first hired.

Groninger testified that she left the Clerk of Courts because the office moved very quickly and demanded perfection. She explained she was much more comfortable working with people in the Register of Wills. Groninger did know Reilly before the interview because both she and Reilly are politically active in Bensalem. She had also spoken to Luce prior to the interview. Groninger denied that politics or her political activity were topics discussed in her interview. She stated she has always been registered Republican. She also denied being asked to work the polls during her interview and added that she worked the polls for years before working at the Register of Wills.

Groninger testified that nominating petitions were often passed around the office for signatures. She also stated Kiefer worked on Warrington Township business as a result of her position as Supervisor "quite often", and sometimes every day. She admitted to putting up political signs during work hours, and recalled that other employees were sent to various train stations to hand out political literature during work hours, all while being paid on county time. Groninger also testified that she knocked on doors during work hours when Kiefer was running for Supervisor and was still paid regularly. She did not know who signed in employees on the days they did political work. Groninger stated she went to political fundraisers, but noted that it was in her capacity as a State Committeeperson and entirely voluntary.

Groninger testified that not all of the employees in the office were politically active prior to working at the Register of Wills. To her knowledge, every employee was expected to and did work the polls. She stated that prior to every Election Day, Kiefer walked around the office asking employees which polls they were going to work, then marked down how many hours they were expecting to be there. The hours would then be confirmed afterwards with the employees. This was a regular occurrence until May 2010. Groninger conceded that some employees did not want to work the polls and spoke out about it. She was not aware of any ramifications that may have occurred as a result.

Groninger could not recall the exact date on which she first heard about the “pink book”, or the practice of awarding “off-the-books” comp time, but testified that it was always mentioned when employees spoke about working the polls. She could not recall who told her because it “was discussed openly” within the office. Kiefer and Quinn directed employees not to speak about “pink book” time outside of the office. Reilly never spoke to Groninger about “pink book” time, but she did speak to employees about working the polls. Groninger described Kiefer as Reilly’s right-hand woman.

Groninger testified Pappert was in charge of payroll when she first started working in the office in 2000. At various other points, Uricchio, Strunk, Bass, Murphy, Swartz, and Quinn also did payroll. If employees wanted to request time off, they were supposed to write it down on a sticky note with the time and how much “pink book” time they wanted to use. For legitimate comp time and vacation time, there was a separate sheet to fill out. Groninger emphasized that the sticky note was solely for requesting “off-the-books” comp time. She did not know what happened to the sticky notes, but believed they were used so that they could be easily destroyed.

Whoever was doing payroll at the time would pull out the “pink book” and tell the employee how much time they had left. Groninger testified that she did use “pink book” time herself, though she did not know how many hours she had accumulated over the years.

When Strunk took over payroll, Groninger testified she sometimes asked verbally for her time off and other times used a sticky note. She could not recall using a form to request “pink book” time. Groninger then conceded that Strunk wanted all employees to use the request forms and not sticky notes, and that she may have put “pink book” on the form, but was not sure. Groninger recalled that Quinn took over payroll after Strunk but did not know the exact date. She added that Murphy and Swartz are currently in charge of payroll duties.

Groninger testified that she has not requested any “pink book” time recently because to her knowledge, there is no longer any “pink book”. When asked to elaborate, she explained Quinn told her and Einhorn that the “pink book” was “gone” and not to repeat that information to anyone else. Groninger could not recall the exact date of this conversation, but noted that it was around the time the office first heard about the investigation. Once word got out to other employees, they began asking Groninger if she knew what had happened to the “pink book”, to which she replied that she did not know anything.

Groninger first denied that she had spoken to Reilly about the “pink book” and the investigation, but then testified that she told Reilly what Quinn had said to her about the “pink book” being gone. Groninger described Reilly’s reaction as “shocked”, and noted that Reilly did not ask what the “pink book” was.

Groninger testified she was out sick during the week when a large amount of shredding took place, and only heard about it from Susan Cummings. From the description given by other employees, Groninger believed that Quinn went to Reilly and Kiefer’s offices and shredded documents. Groninger emphasized that she, “would have fell off the chair if I saw her running around doing that.” She did not know if any documents were missing because she stated she did not know what was in the file cabinets beforehand. Groninger did offer that she knew Quinn kept the “pink book” locked in her desk at one point.

Groninger testified that she was very close to Quinn for some time. They would go shopping together during work hours and go to see Quinn's granddaughter together. Groninger admitted that she and her husband spent Thanksgiving with Quinn's family one year. Groninger conceded that "at one point in time" she was one of the supervisors' "favorites" in the office. She also named Uricchio, Swartz, and Schrode as other favorites, though she added that Uricchio had a falling out with Quinn. Groninger denied that she could come and go as she pleased, though she did admit to going in and out of the office when asked to do various tasks, such as taking things to Reilly's house towards the end of the work day. She added that Quinn started making employees sign in and out to go to the bathroom recently.

Groninger then testified that in 2009, Quinn put her through a "very stressful time. by demeaning her, belittling her, and moving her seat in the office because she ran against Kiefer for State Committeeperson. Groninger stated Kiefer never mistreated her for defeating her in the election for State Committeeperson, but Quinn seemed extremely upset about it. Groninger admitted that she was trying to distance herself from Quinn because of the pressure she put on her following the election. She then conceded that Quinn warmed up to her again when Groninger was diagnosed with breast cancer. She recalled that Kiefer, Murphy, Quinn, and Reilly met with her in the office and offered to support her and be there for her, even taking her to and from chemotherapy. Groninger admitted that she "felt like it was family taking care of her."

Groninger testified Quinn told her and Susan Cummings, "I'll find out who did it," regarding the investigation. Quinn also told her "When I do – they've done this to my family – I will get them." She added that Quinn has called her several times since she left the office, often at bizarre times of the day. Groninger believed Quinn may have immunity because Quinn told her she "took care of herself." Groninger has also discussed Quinn's possible immunity with Bass and Reilly. Reilly and Bass were both upset about the possible immunity, and Groninger stated she is upset at the thought of Quinn getting "a deal" because if it happened, "it was something that everybody did together." Groninger denied ever saying that if "everything is blamed on Candy and she has a deal and immunity, everybody else will be fine."

Groninger also testified that Kiefer and Quinn spoke to her before Investigator Rouland interviewed her. They implied that they did not want her to volunteer any information, but never directly asked her to lie. She explained they put her under so much stress that she lied during her first meeting with investigators. After her meeting with Investigator Rouland, Kiefer and Quinn questioned her about the conversation. In September 2010, after Groninger heard that Quinn had a "deal", she told detectives the whole truth. Groninger denied that her change of heart was because she had heard about Quinn's immunity.

Groninger admitted that she told Investigator Rouland she had never heard of the "pink book" or "off-the-books" comp time. She denied that she lied about the "change box", saying she believed the money was deposited by Einhorn on a regular basis. Groninger also stated the only time she saw money taken out of the "change box" was for employees to make change, and then recalled she saw Kiefer take money out, but did not know what she did with it. Groninger admitted she had heard about a drawer in Quinn's desk filled with change, but never personally saw it. To her knowledge, the "change box" was not removed during audits.

Groninger denied that blame has shifted to Quinn recently. She testified that employees primarily blame Kiefer and Quinn together for everything as they have both left the office. Groninger stated that before Kiefer and Quinn left, employees were screamed at, belittled, demeaned, and humiliated on a regular basis.

Groninger testified that she has been union steward in the office for approximately five or six years, after Kiefer asked her to become the representative. At the time, she was very good friends with Kiefer, Reilly, Bass, and Quinn. Most of the non-management employees in the office are union employees. When asked about her representation of employees, Groninger stated Lisa Sutherland wanted to file a grievance once, but changed her mind the next day. She conceded that the workplace atmosphere was unprofessional and at times atrocious, but never found the lack of grievances odd until the investigation began. She denied that she may have had a conflict of interest by being such close friends with management while she was a union representative. Groninger also denied that she would have faced repercussions from management if she had gone through with Sutherland's grievance.

Groninger denied that Reilly or Bass had a conversation with her about her grand jury testimony. She stated that Bass and Reilly speak on the phone in the office almost every day and that sometimes the volume is loud. Groninger denied ever making noise or whistling to cover up the telephone conversations between Bass and Reilly, though she did admit that she whistles and sings at work normally. She also admitted she asked Bass to keep her voice down while on the phone, but only because the customers could hear her at the front counter. Groninger testified that she feels loyal to Reilly "as a boss" and is good friends with Bass.

Groninger also testified she believed the "pink book" was wrong, but never said anything about it because she was afraid. She agreed that it was stealing money from the county and that people should be held accountable, including Kiefer, Quinn, Reilly, Bass, McCullen, and Murphy, if they were involved.

Groninger denied ever making the statement, "they've got nothing" with regard to this investigation.

Testimony of Diane Bochenek

Diane Bochenek testified that she began work at the Register of Wills on Monday, April 5, 2010. Prior to her employment there, she worked at the District Attorney's Office for six years. Bochenek stated that she moved when the new District Attorney was elected, and took a significant pay cut. She emphasized that she was not a "plant" for the District Attorney's Office.

Bochenek testified that she has known Kiefer for many years. She described Kiefer as a "die-hard Republican" and explained that several years ago she and her husband went to Kiefer and asked how he should run for district justice. She recalled that Kiefer advised her to get involved in Republican politics, stay active, and volunteer, so they both began to volunteer to work the polls twice a year. Each election, Bochenek called Kiefer to ask her where she was needed in Warrington Township and they would go volunteer. Eventually, her husband ran for committeeman in Warrington, District Eight and won. Bochenek herself wanted to run for committeewoman, but was asked by then-District Attorney Diane Gibbons not to do so while she worked in the office. Instead, Bochenek stated she became assistant committeewoman for several years. When her husband ultimately lost his election for district justice, they

both agreed that they were “done” with politics. She stressed that she no longer wants to be involved with Warrington Township politics and is not politically active anymore.

Bochenek testified that Reilly, Kiefer, Murphy, and Quinn interviewed her for the position at the Register of Wills. Though no one told her about “pink book” time during the interview, Kiefer told her it was “widely known” that the Register of Wills was “a very political office.” Bochenek recalled that Kiefer also told her that people who worked in the office were very active in politics. At the time she was interviewed, Bochenek was registered Republican and stated she had volunteered to work the polls frequently.

Bochenek testified that Lisa Sutherland, Pat Caimano and Susan Cummings trained her by allowing her to shadow them on the Register of Wills side. It was through her training that she learned about the “change box” and cash register in the office. She recalled that when she first began working at the Register of Wills, customers who made copies of documents left the copier fees on the counter before they left. Only if they wanted a receipt or paid by check was the money put in the cash register. Otherwise, employees would take those quarters and put them into a metal “change box” next to the register. She witnessed Quinn go into the box, but did not know for sure whether she took money. In one instance, Bochenek recalled that someone had left a five dollar bill on the counter. When she went to put it into the metal box, another employee told her not to because “they use that for sodas and stuff.” She stressed that until this point, she did not know that anyone ever took money from the metal box for personal use. Bochenek then explained that some employees were annoyed that administrators used the money to buy sodas and avoided putting money in the metal box whenever possible.

She also testified that the money in the metal box always seemed to stay at the same level, approximately half full. Bochenek recalled that about a month into working in the office, she went to deposit probate receipts in Quinn’s desk drawer and found approximately fifty dollars worth of quarters. She stated that at the time, she thought that someone had moved the “change box” to Quinn’s desk. Bochenek also testified that around the time the investigation began, Maryann Groninger put signs around the office instructing employees and customers that all copier fees must be collected immediately and a receipt issued regardless of whether it was requested. She did not know who made the decision to end the use of the “change box”.

Bochenek testified that when she first began working at the Register of Wills, Colleen Strunk was in charge of payroll as supervisor, a position below administrator. Bochenek stated that the procedure to request time off was to fill out a sheet, check off the type of time taken, and hand it into Strunk. Strunk then marked it on a day planner, approved and signed the slip, and gave the employee a copy. Around the time the investigation began, Bochenek remembered Strunk saying, “Oh, my God, the attendance book is gone.” A little while later, Strunk’s attendance file on her computer went missing. Bochenek explained that little by little, payroll duties were taken from Strunk and given to Murphy. At that time, employees were informed that they would have to go through Bass, Murphy and Quinn to get time approved, but using the same forms. Bochenek stated that around this time, Quinn spoke on the phone with either Reilly or Kiefer and loudly said that “I told you not to trust Colleen” and “she’s been nothing but trouble.”

Bochenek testified that the first time she heard about “pink book” time was around the Primary Election in early May 2010. She estimated it was probably a week before the election that someone in the office,

she thought possibly Susan Cummings, told her about unofficial comp time that could be received for working the polls. Bochenek recalled that as the election approached, Kiefer asked her if she was available for Election Day. Though she did not want to spend her day volunteering, Bochenek said she wanted to “do my part” and told Kiefer she could be at the polls for three hours. Kiefer asked her again several days later, and Bochenek told her the same answer. She testified that no one ever told her where she was supposed to work, so she did not go.

Bochenek testified that a week or two after the primary, she overheard a group of employees discussing comp time and saying “did you hear there’s no more ‘pink book’ time?” She recalled that it was Cummings, Sutherland, and probably Pat Caimano talking about the end of “pink book” time. She could not recall hearing anything other than that around the office.

Bochenek stated she did not earn any comp time at the Register of Wills, but that she did have some legitimate comp time left over from her time at the District Attorney’s Office.

She also testified that she was unaware if “family trees” were ever sold by the office.

Bochenek testified that the office environment changed dramatically after employees heard about the investigation. She explained that sudden rule changes and seating arrangements happened frequently after the investigation was discovered. For example, she stated that Quinn would send out emails “out of nowhere” at 1:00 AM demanding seating changes effective immediately. Hour-long Friday lunch breaks were shortened to half an hour. Employees were also told that everyone had to have a witness sign them back in when they went to the bathroom, but this practice is no longer going on. Bochenek also witnessed administrators questioning employees who were interviewed by investigators. She recalled when Quinn told Einhorn “you tell them you’ve done this once”. You’re not participating in this anymore. when Einhorn was asked to be interviewed again. To her knowledge, Einhorn never went back for a second interview. She did not know if administrators interrogated anyone else before or after interviews with investigators.

Bochenek did recall what some employees said to the office when they returned from their interviews with Investigator Rouland. She testified that Donna Hampshire said “they know everything” when she got back to the office. She also recalled that Maryann Groninger said, “they can investigate all they want, but they’re not going to find anything” and “they’ve got nothing.”

Bochenek testified that she witnessed Quinn shredding a large amount of documents sometime around the Primary Election. She recalled that Quinn pushed the shredder into Reilly’s office, saying “Becky is not going to like this. She hates it when I clean” and estimated that the shredding took almost an entire day. Bochenek believed Einhorn helped Quinn do the shredding. Within a week, she also saw Swartz going from computer to computer, saying she just needed it “for a few minutes” to check the drives. Bochenek did not know specifically what Swartz was doing on the computers. She was not aware of any boxes of files being removed from the office.

Bochenek did not know whether Reilly or Quinn ever made any threats towards employees in the office concerning the investigation.

Bochenek testified that Reilly calls into the office every day, but only comes in once in a week-and-a-half. She added that most of the time she calls Bass, who has a very loud phone, and that employees can sometimes hear the conversation. Bochenek stated that during these phone calls, Groninger “deliberately makes noises and clears her throat”, because she is “quite loyal to Barbara.”

Testimony of Vicky Shastay

Vicky Shastay testified that she was an employee of the Register of Wills, Orphan’s Court, in Bucks County, Pennsylvania from 2001 to 2004. For the last five years, she has worked as a custodian at Neshaminy Manor in Bucks County.

Shastay testified that while at the Register of Wills, she worked on genealogy and occasionally helped with marriage licenses. During her time at the office, Barbara Reilly was the Register of Wills. Shastay stated that whenever Reilly was not in the office, Sandy Pappert, an administrator, was in charge. After Pappert left the Register of Wills, Kiefer ran the office whenever Reilly was not present.

Shastay testified that Kiefer told her to do political work while at the Register of Wills. One of these activities would be entering names, addresses and phone numbers into a list to help Kiefer’s campaign for Warrington Township Supervisor. Shastay stated that she performed other political activities for Kiefer during work hours, but could not remember all of them. Shastay testified that she was also coerced into doing political work during her free time as well.

Shastay explained that everyone at the Register of Wills was expected to work at the polls on Primary and General Election Days. Shastay stated that Reilly told her specifically to work at the polls on Election Day when Kiefer was running for Warrington Township Supervisor, as well as when Reilly herself ran for office. Shastay testified that Lisa Harrigan, Reilly’s assistant at the Register of Wills, also had to do political work for Kiefer during work hours. Though Kiefer’s predecessor, Pappert, never forced Shastay to work the polls, Reilly did ask Shastay to do so as a requirement of her job.

Shastay testified that because elections are paid holidays for county employees, everyone was paid as usual for that day off. However, she stated that she also received “off-the-books” comp time separate from her regular vacation days for working the polls. Shastay explained that she would report how many hours she worked at the polls to Alyce Luce, who would then record it in a book. When Shastay wanted time off, she would notify Luce, who would mark it in the same book used to record comp time. Shastay estimated that she used at least some of her comp time before she quit. Luce told Shastay that this “off-the-books” comp time was a secret, and that people outside the office were not to know about it. Shastay testified that Kiefer or Luce “harassed” and “belittled” employees who did not want to work the polls, for example, asking, “what’s your excuse” and “you know you can do it, it’s your day off.”

Shastay testified that she was harassed at work by Luce and Kiefer. Shastay explained that, for example, Luce and Kiefer harassed her for weeks about her typing abilities, even though her work in genealogy did not require much typing². Reilly and Kiefer called her an “idiot.” Kiefer called her various

² *Alyce Luce testified that she did not support the hiring of Shastay because of her lack of typing skills. Reilly hired Shastay over Luce’s objections.*

other unkind names as well, though Shastay could not remember all of them. Shastay testified that some Register of Wills' employees were harassed to such an extent that they quit. She stated that Robin Gallagher, Mary Ellen Jacoby, Donna Riss, Cindy Lauer, Carol McGill, Eileen Heitz, and Concetta Grunmeier were all pushed out because of the harassment they received for not wanting to do political work. Shastay testified that both Reilly and Kiefer would call these employees names in the office and scream at them in public areas of the office. Shastay recalled incidents where Heitz, McGill, and Jacoby were all reduced to tears at work due to the force of Kiefer's yelling. Shastay added that when Quinn took over Luce's job as administrator, "she changed completely" and would dictate Kiefer and Reilly's orders to the other employees.

Shastay testified that Register of Wills employees sold "family trees" at the Grange Fair. These "family trees" were blank forms produced by the Register of Wills office to be filled out by the person who bought them. Shastay would take the money from these sales and give it to Quinn or Luce. She did not know where they took the money, and never saw it rung up into the office cash register.

Shastay also testified that she witnessed Kiefer take money from the Register of Wills' copy machine money jar to pay for her lunch at least twice, though she admitted she could not tell if it was a regular occurrence because her seat in the office did not face the copy machine jar.

Shastay testified that she also witnessed Kiefer take money from a charity collection jar in the office to pay for her lunch. Shastay stated that Jim McCullen, the First Deputy in the office, sold Tootsie Pops at his desk for 25 cents and donated the money to St. Francis' Boys' Home. Though this money was strictly for McCullen to give to charity, Shastay testified that Kiefer nevertheless went into the jar and took money out to pay a lunch deliveryman. Shastay testified that McCullen never partook in any of the political activities.

Testimony of Jane Wenda

Jane Wenda testified that she is a former employee of the Register of Wills in Bucks County, Pennsylvania, and currently works at General Services for Bucks County.

Wenda testified that she worked at the Register of Wills for three years as a probate clerk. Her work duties included filing, answering phone calls, collecting inheritance taxes, and providing counter service to attorneys. Wenda's direct supervisor was Sheila Bass. During her time there, Barbara Reilly was the Register of Wills, and day-to-day office administration was run by Rebecca Kiefer. Wenda recalled that she only saw Reilly in the office five to ten days per month.

Wenda testified that in addition to her official duties, Kiefer asked her and other employees to do political work while in the office. Wenda described Kiefer telling her to go door-to-door to get signatures on political petitions unrelated to Register of Wills work. In addition, she was asked to create street lists for other employees to use to do the same. Wenda stated that this proposition caused anxiety among the employees. Wenda also recalled that Kiefer required Vicky Shastay, another employee, to put together political envelopes while at work.

Wenda testified that she was aware of the office “pink book” in which “off-the-books” time-and-a-half comp time given for political work was recorded. Wenda explained that employees were “told they had to work” at the polls on Election Days, and would be granted “off-the-books” comp time in return. Wenda is a Middletown Township State Committeeperson, and has worked the polls for the past twenty years regardless of whether she was working at the Register of Wills. Wenda stated that Bass handed out a sheet of paper on which everyone had to sign up for hours that they would work the polls. She also explained that Bass and Kiefer told her that the comp time would be just “between us.” Wenda was not aware that she had accumulated any of this comp time and did not know if she had used any of it. Wenda also did not know if Reilly was aware of the “off-the-books” comp time, but she posited that it would be difficult to miss.

Wenda also stated that this political activity, unrelated to Register of Wills business, took precedence over the normal operations of the Register of Wills because much of it took place during business hours.

Wenda testified that she witnessed Kiefer taking money from the box in which copy machine fees were stored and using it to buy lunches. Wenda did not see anyone else in the office take money from the copy machine box.

Wenda also testified that “family trees” were sold at the Grange Fair prior to the start of her employment at the Register of Wills. At first, she stated that she did not know who received the proceeds from those sales. When pressed, Wenda testified that “general conversation” in the office indicated Kiefer, Reilly, and Quinn used the money to go out to dinner. Wenda stated that while she worked there, the “family trees” were free.

Wenda testified that the daily operations of the office made her uncomfortable. She explained that Kiefer, Bass, and Quinn would belittle and yell at employees on a regular basis, often reducing employees to tears. Wenda experienced this type of harassment herself when the Chairman of the Bucks County Republican Party had asked her to run for Register of Wills. This created problems within the office because Reilly had made it clear that she wanted Kiefer to be the next Register of Wills.

Wenda testified that she spoke with several employees in the office about running, among them: Concetta Grunmeier, Vicky Shastay, Kathy Hennessy, Carol McGill, Cindy Lauer, Eileen Aiken and McCullen. Wenda stated she was not sure if she wanted to run for Register of Wills. While she considered it, the environment at the office turned hostile. Though she previously had no complaints about her work, Kiefer now piled on additional duties and tasks for Wenda without the necessary resources to execute them properly. For example, Wenda stated that she was asked to calendar all of Reilly’s speaking engagements as well as prepare and package literature for the events, but was not allowed access to the Internet or a long-distance phone connection to contact event coordinators. Kiefer required Wenda to sign into Bass’s computer to complete this new aspect of her employment. Wenda stated that Kiefer also required her to travel throughout the county to probate at attorney’s offices and manage billing adjustments in the office. Wenda testified that she had heard Kiefer express an interest in running for Register of Wills before.

In the midst of this increased workload, Wenda also testified that Reilly called her in for reprimands more frequently. She stated that Kiefer, Bass, and Quinn were also typically present at these meetings. For the

last year and a half to two years she worked there, Wenda estimated that she was reprimanded several times a week.

Wenda also testified that in addition to the various new requirements of her job, she was forbidden to leave her desk while at work. She stated that Kiefer, Bass, and Quinn belittled her in the office, calling her names and saying she was “a bad girl,” which Wenda described as “kind of off the wall.”

Wenda testified that the day she quit the Register of Wills, she did so because of the stress of one final argument with Bass and had to be taken to the hospital by her friend, Kathy Hennessy. Following this stress-related departure, Wenda stated she visited a doctor at least three times for anxiety.

Wenda testified that she knew of several employees who left the office due to stress, including Carol McGill, Vicky Shastay, Eileen Heitz, Mary Ellen Jacoby, and Donna Riss. Wenda stated that these employees were belittled and often reduced to tears in the office. Wenda stated that she never saw McCullen, the First Deputy in the office, belittle any employees or assign anyone political work.

Testimony of Kathleen Hennessy

Kathleen Hennessy testified that she worked for the Register of Wills in Bucks County from November 2005 to September 2007, first as seasonal help and then as a probate clerk. Once she became a probate clerk, she held a salaried, permanent position. Hennessy testified that as a clerk, she probated wills, helped people navigate the estate system, took death certificates, and worked outside the office on occasion. In her time at the Register of Wills, she held positions as probate 1, probate 2, and probate 3, which Hennessy explained denoted more responsibilities and seniority with each higher number. Hennessy testified that Barbara Reilly promoted her to each position.

Hennessy testified that she got her job at the Register of Wills by applying for it, and added that any letters of recommendation in her file were there from when she first worked at the county in another position.

Hennessy testified that when she began working at the Register of Wills, Barbara Reilly was the Register of Wills, James McCullen was First Deputy, and Rebecca Kiefer ran the office as Second Deputy. She added that McCullen “didn’t take care of the office.” The two administrators were Sheila Bass and Candace Quinn, and Hennessy testified that Quinn filled in for Kiefer when she was absent. She also noted that Bass often moved between the two sides of the office.

Hennessy testified that prior to working for the Register of Wills, she “always” worked the polls during elections because her father had been the county Sheriff for twenty years. She stated that it was “normal” for her to work the polls, and that she sometimes worked the polls for Reilly prior to her employment with the Register of Wills or “anybody that I knew that I was friends with.”

Hennessy testified that sometimes employees were put in the “bad girl chair” in the front left cubicle of the office. When someone was in the “bad girl chair,” no one was allowed to speak to her, and she had to answer the phone all day. Hennessy testified that in the three years that she worked there, she sat in six different cubicles including the “bad girl chair” several times. Hennessy recalled one occasion in which

Jane Wenda was put in the “bad girl chair” and Hennessy drove her to the hospital from the stress. She also recalled that Karen McGill left the office for health reasons related to work stress. Hennessy specifically recalled that Kiefer viewed Wenda as a political threat because there was talk that the Republican party wanted Wenda to run for Register of Wills. This angered Kiefer because Kiefer herself wanted to run for the position and Reilly was planning to step down for her.

Hennessy testified that she heard of the “pink book”, but never actually saw it. She explained that the “pink book” was for “off-the-books” comp time given if Quinn, Kiefer, or Bass “needed you to go out and put up political signs.” Hennessy first stated that she did not think she was ever in the “pink book”, but then recalled that she had been logged out for six hours in 2006. She could not remember receiving the comp time. Hennessy emphasized that she never saw the “pink book”.

Hennessy testified that she did take time off in 2005 when her father was dying, but stated that this was well before the “pink book” time she was given in 2006. She was adamant that the only time she took off work without pay was when her father had a valve replacement in January 2005, and then off and on until he died in September 2005. Hennessy explained that sometimes she would leave work early to care for her father and that “Barbara was very good to me that way” because Reilly was friends with her father. She emphasized that she did not know why she had been marked down as taking “pink book” time.

Hennessy testified that even though she herself was never asked to put up political signs, she recalled one woman who was asked to do so and refused. Hennessy testified that Renee Chantelau refused to participate in political work because she felt uncomfortable knocking on doors as a single woman. Even though she told Quinn, Kiefer, and Bass her reasons for not wanting to participate, she was given two or three weeks to get her list of addresses done. At the end of that time frame when Chantelau still refused to knock on doors, she was handed her resignation form and asked to sign it.

Hennessy testified that she was asked to sign political petitions, but never had to take one out of the office for signatures. She could not say whether any other employees were ever given petitions to take out of the office. The petitions would not solely be for Reilly or Kiefer, but for other political campaigns as well. Hennessy also testified that the most pressure to do political work was when Reilly was running for office—her term lasts four years, so she runs in an election every four years—although they did not just do it during her campaigns.

Hennessy testified that for example, she would go to Republican Headquarters during her lunch break and stuff envelopes. She stated that if the Republican office was backed up, there would be an announcement that employees who could go over at lunch were allowed to. To her knowledge, it was not a requirement that employees go. However, she conceded that an employee would become a target or be put in the “bad girl chair. if they did not go to stuff envelopes.

Employees also did political work while in the Register of Wills Office and during business hours. Hennessy testified that employees were supposed to stuff envelopes, put stickers on things, and prepare political magnets. She explained that she and others were given a stack of things to do, and had to do it or there would be “the arrow and the target” on their backs.

Hennessey could not recall there ever being a specific conversation or meeting in which supervisors told employees they had to do political work. She described the topic as “taboo.”

Hennessey testified that there was a “change box” under the cash register in which money from copier fees was placed. She stated that “it was understood” that the dollars and quarters went into the “change box” and soon became clear to her that it was Kiefer’s “own personal change box”. Hennessey explained that she thought of it this way because she witnessed Kiefer take money from the box for lunch or the parking meter. She added that if any other employee would take money from it, they would be put in the “bad girl chair.” Because she felt the entire process was wrong, she and other employees would ring up copier money in the cash register whenever they had the chance. Hennessey recalled that Einhorn took the “change box” money into the back and rolled it up on a regular basis. She did not know what happened to it after that.

Hennessey denied that either Reilly or Kiefer ever asked her to do personal favors, run errands, pick up laundry, or go grocery shopping. She did testify that she heard other employees had to run errands for Kiefer. For example, she recalled that sometimes an employee would come into the office late saying she “had to do something” for Kiefer. She could not recall any specifics, but said it was always the “in-crowd” employees who did these things for her, namely: Quinn, Bass, Swartz, and Murphy.

Hennessey testified that Kiefer was a township Supervisor for Warrington Township at the time. She denied that Kiefer ever asked her to do work for the township, but did witness her ask other people to do work for the township. Hennessey specifically recalled that Kiefer asked Lisa Harrigan to do Warrington Township work, and that for a certain amount of time Harrigan did. Later, however, Harrigan told Kiefer she was not going to do it anymore. After this, a meeting was called in Reilly’s office with all of the employees and the supervisors stripped Harrigan of all of her duties in front of everyone.

Hennessey testified that she and other employees tried to make the best of the office atmosphere and have fun in spite of the supervisors. She stated that someone was always a target and there was always an employee in the “bad girl chair.” Office morale was poor, and dealing with the supervisors was very difficult. Hennessey described the end of the workday as the time of day everyone “escaped” and added that “after a while it was just too much.”

Hennessey testified that once, while she was working in Human Resources, one of the employees at the Register of Wills called Hennessey and told her that they were doing political work again, at that very moment. Hennessey stated she told her boss at Human Resources, who called then-COO David Sanko to catch them red-handed. When Sanko went down to the Register of Wills, he “walked up to the countertop and couldn’t see anything.”

Testimony of Alyce Luce

Alyce Luce testified that she was hired at the Register of Wills in Bucks County around 1989 as a probate clerk. At the time, James McCullen, Dee Boise, and Barbara Reilly—the elected Register of Wills—interviewed her for the position. Prior to working there, Luce did not know any of the employees, but her sister-in-law did know Reilly. During the interview process, she was not asked about her political affiliation or political activity. Luce could not recall whether she was told it would be a requirement of her

job to help out with Reilly's reelection campaign, and only stated that, "well, you could always say no." Luce admitted she had never seen or heard anyone in the office refuse to participate in the political activities.

Luce testified that she worked as a clerk in the Orphan's Court side of the Register of Wills until 1999 when she was promoted to an assistant administrator. At that point, her direct supervisors were Reilly, Kiefer, and McCullen, and her job was to oversee other wage employees in the office. She made the decision to retire in 2004.

While she worked at the Register of Wills, Luce testified that she was only ever asked to volunteer to work the polls and that it was never mandatory. Prior to her hiring, she had never done any political work, but as soon as Reilly's reelection campaign began, she was asked to help. Luce then conceded that it was in fact mandatory for employees, and "they just told you which polls to work in."

As part of Luce's job of interviewing potential employees, she testified that she made recommendations on whom to hire. At first when she testified about the interviews, she stated she could not recall whether interviewees were told they would have to work the polls for elections. After she was confronted with her previous conversations with detectives however, Luce admitted that potential employees were told during the interview that political work would be required as part of the job.

In addition to employees being required to work the polls, Luce testified that "off-the-books" comp time, also known as "pink book" time, was given for the hours that employees spent at the polls. She became aware of this practice shortly after she was hired, but could not recall whether it was Kiefer or Boise who told her to keep this practice quiet. Luce believed that "pink book" time was only earned by working the polls. She was aware that some people had handed out pamphlets at the train station, but claimed that they only did it before work hours so they would not have earned "pink book" time for it. She herself never did it. Luce was also aware that employees were expected to attend political fundraisers where they paid for tickets themselves, but insisted they were voluntary and thus did not warrant "pink book" time. She could not recall anyone who had ever refused to go to a fundraiser.

Luce testified that there was also legitimate comp time given to employees for going to extra-hours activities like the Grange Fair or local bridal expos. This comp time went through the normal channels and was documented by the payroll department on a standard form.

Luce testified that she had received "off-the-books" comp time for working the polls on Election Days. She stated that whenever she requested to use this comp time, she would ask her supervisor or Harrigan, Reilly's assistant. She never saw the "pink book" or the list that kept track of each employee's "off-the-books" comp time, but did recall that employees often used a piece of paper stapled to the normal timesheet with the comp hours desired. These pieces of paper would not go to the Controller's office, and the employee would be paid for the "off-the-books" comp time.

Luce testified that in her role as administrator, employees asked Luce when they wanted to take their comp time. She entered the time into a timesheet and put it into the computer system as regular work hours for which employees were paid. Reilly, Kiefer, and McCullen were all aware of this practice, though Luce stated only Reilly and Kiefer told her to keep track of the "off-the-books" comp time in this manner.

When she was in charge of payroll, Luce denied that she ever marked in absent employees as present, but added that Kiefer was in charge of her own timesheet. Luce recalled that whenever Kiefer was absent, she marked herself down as at a meeting or seeing an attorney.

Luce also testified to the use of the “change box”. Luce stated that her supervisor, Boise, originally told her that money paid to use the copy machine when someone did not want a receipt went into the “change box” on the Orphans Court side of the office. She added that there was a second “change box” for the other cash register on the Wills side. She did witness people make change from the “change box” on the Wills side of the office. Luce stated that during Controller-directed office audits, Kiefer placed the “change boxes” into a safe to which auditors had no access. She also recalled that Carol Correll recently told her that some of the “change box” money was deposited into a checking account. She stated she never saw anyone take money out of the “change box” for personal use and never saw Kiefer take money out for sodas or lunches. Later in her testimony though, Luce admitted that she did in fact see Kiefer take money out of the coin box. She explained that Kiefer “would just come over... and she would just take it.” Luce was emphatic that she did not know what Kiefer used the money for.

Luce also testified that “family trees” were sold by the Register of Wills for a dollar “for a short while” and the proceeds were put into an envelope. She believed the envelope also went into the safe when the office was audited, but was not sure. At first she stated that she did not know what happened to the money, and then she said that Kiefer “may have taken some money.” She did not know what Kiefer used it for, and never personally saw her take it. These “family trees” ceased to be sold before she left the office in 2005.

Luce testified that she never saw Kiefer doing Warrington Township work at the Register of Wills, and never saw employees stuffing envelopes for Warrington Township politics. She said she only heard “through the grapevine” that both Kiefer and Reilly made employees stuff envelopes for politics at work, but later testified she “knew. that it happened. Luce emphasized it was not her job to say anything about the political work being done on county time. She also recalled that employees specifically stuffed envelopes in the back room so that other county employees would not see them doing it. Employees were also sent to work at the local Republican Headquarters during lunch. Luce testified that it was also a common occurrence for political petitions to be sent around the office. Luce first testified that she believed Kiefer sent the petitions around, but then identified McCullen as the person who brought them in. Luce added that there was no definite understanding as to whether you had to sign the petition, but said she might have felt uncomfortable not signing it.

Luce testified that Kiefer did run the office unfairly because of her temper, and also felt that employees were not treated equally according to skill. For example, Luce testified that Vicky Shastay was hired over her objections because Reilly wanted Shastay to work in the office, despite concern over her lack of typing skills³.

Luce testified at length about office relations. She recalled an incident where Robin Gallagher accused Quinn of pulling her hair after Gallagher’s brain surgery. Though Luce could not recall the details, and stated that it was “all very fuzzy”, she did remember being in the office that day. She stated that Gallagher was mistreated in other ways though she did not elaborate. She described Concetta

³ Shastay testified that she was “mistreated” and harassed about her lack of typing skills.

Grunmeier as “very conscientious”, and stated that Donna Riss was one of the best workers in the office whom she was shocked to discover left on bad terms. Luce stated that Mary Ellen Jacoby was not mistreated, but was simply asked to cease making and accepting personal phone calls.

Luce testified that Quinn took over her job as administrator when she left. She described Quinn as experienced, but lacking in people skills. Luce admitted no one trained Quinn to be an administrator, and Luce herself was never trained either.

Luce downplayed her role as an administrator and testified that she was just a “glorified clerk.” She answered to Kiefer, Reilly, and McCullen, but was disciplined by Kiefer if there was a problem with her work. Luce stated she was unable to offer her own views about the running of the office or contribute in any meaningful way to office administration. She never spoke with Kiefer or Reilly about political work in the office because she was anxious about losing her job and “they wouldn’t have listened.” Despite this anxiety, Luce claimed that no one ever lost their job for speaking up.

Luce testified that she first became aware of the investigation when she saw a newspaper article about it. She stated she has not been contacted by anyone from the Register of Wills regarding the investigation, including Reilly, Kiefer, Quinn, Murphy or Bass. On the day of her testimony, she did briefly speak with some of the other grand jury witnesses waiting to testify. Later in her testimony, Luce recalled that she called Quinn and tried to speak with her about the article she read concerning the investigation, but Quinn told her that she could not discuss it. Luce estimated this conversation occurred right before she spoke with detectives.

Finally, Luce testified that she knew about all of the political work going on in the office, about the “off-the-books” comp time, and that she never really thought it was right or wrong. Later on however, she agreed that she thought it was wrong but never reported it to anybody because she was “just a glorified clerk.” Luce testified that she never spoke up because she was afraid of losing her job, then claimed that there were never repercussions for saying no, because nobody ever refused to participate.

Testimony of Sheila Bass

Sheila Bass testified that she has been the acting administrator at the Register of Wills office in Bucks County since June 23, 2010. Bass came out of retirement to fill vacancies left by Quinn, who went out on FMLA leave, and Kiefer, who retired. Bass stated that she previously worked at the Register of Wills from 2003 until 2009 as an administrator. James McCullen is still in the office as the First Deputy, Patricia Murphy is the administrator for the Orphan’s Court section of the office, and Barbara Reilly remains the current Register of Wills. Bass stated that Reilly is very hands-on in running the Register of Wills, despite being absent frequently.

Bass testified that at the time she transferred into the Register of Wills in 2003, Kiefer and Reilly interviewed her for the position. While Bass was not asked about her political activity or affiliation, Bass did state that at the time she was very active in local Republican politics. She added that she originally met Reilly on Reilly’s campaign trail in 1975, and has remained close with her over the years.

Bass testified that many of the employees at the Register of Wills worked the polls for elections, but that it was entirely voluntary. Bass explained that each employee's hours were recorded and that they were given "off-the-books" comp time for it. One of Bass's jobs was to both handwrite and later type up a schedule of when employees worked the polls. Someone also did this job after she left, but she did not know who. Bass was told about this system shortly after she started work in 2003, but she could not recall who told her. Bass testified that at the time, Quinn was in charge of recording the hours and comp time in a book, and that Kiefer and Reilly both knew about the polls and the "off-the-books" comp time. Bass did not know if McCullen was aware of the system. Bass testified that while almost all employees worked the polls on Primary and General Election Days, it was not mandatory, and each only worked for an hour or two. To her knowledge, if someone objected, they were not forced to go to the polls, but Quinn and Kiefer would be upset. When someone wanted to use their hours, Bass stated she would get a sticky-note from the employee stating where they were going and how many hours they wanted to use, or they would tell her verbally. She would then pass this on to Quinn, who kept the book in her desk drawer. Bass explained that the reason they used sticky-notes and verbal notice was because the hour's book was not always accessible. She conceded that another reason for keeping the communications limited to sticky-notes was to avoid a paper trail.

Bass also testified that when she began doing payroll in 2005, she sometimes kept the book in her desk. In keeping track of hours, she would record the name of the employee, the date they worked at the polls, and the hours that they had used. At first, she could not recall if the hours carried over from year to year, but when asked again she testified that she believed that unused hours were carried over. Bass stated that Karen Urrichio took over payroll in 2006, and Strunk took over after Urrichio. She could not recall how Strunk chose to record the "off-the-books" hours. Bass emphasized that the term "pink book" was only used after she had retired.

Bass testified that employees at the Register of Wills did sometimes work on campaigns at work. However, she claimed that when they did, it was only during lunch breaks or after hours. She could not recall if employees ever did anything else and did not know for sure if any personal favors for Quinn or Kiefer were done during work hours. Bass recalled that Kiefer received faxes and phone calls regarding her job as Warrington Township Supervisor while at work and that this made Bass and other employees uncomfortable.

Bass testified that when she returned to the Register of Wills in June 2010, a group of employees told her that the "pink book" had been shredded. She emphasized that neither Kiefer, Reilly, nor Quinn told her that the "pink book" was gone. Bass stated that she also discovered other items had been shredded, including audits that documented revenues and expenses of the office and time sheets used to ask for vacation and comp time. She believes the time sheets were shredded, because after detectives asked her to retrieve employee time sheets, Bass went to the spot she thought Quinn had been storing them and discovered all of the time sheet files were missing. Bass stated that she attempted to ask Quinn what had happened to them, but that Quinn's lawyer had directed her not to talk about it. Bass also asked Murphy and Reilly, but neither knew where they were. When she asked Kiefer, Kiefer told her that Quinn had moved the files recently.

Bass testified that at the time of her grand jury testimony, there was no documentation for employee time off, legitimate or "off-the-books", more than a few years old. Bass stated that they only have some of

the files now because the county instituted a computer system earlier in 2010. She also explained that in addition to the sticky notes or request forms that kept track of “off-the-books” comp time usage, there were also calendars kept for whoever was doing payroll. These calendars were kept with the same files as the sticky notes and request forms, and are also currently missing. Bass testified that several employees in the office told her that these documents were also shredded by Quinn, and that Quinn took several computer disks and boxes of files and removed them from the office.

Bass also testified as to the use of the petty cash, or change drawer, in the office. She explained that the money in the “change box” was used to make change for people using the copier because there were not enough small bills and quarters in the cash register. Bass also recalled that before she retired, the quarters were collected and deposited at the bank by Einhorn, and much of the remaining money was put into a drawer in Quinn’s desk. Bass never actually witnessed the money being put into Quinn’s desk, but stated that at the time, she was aware that it occurred. Bass believed this money was used for office supplies, as the county made deliveries once a week. She claimed that the office sometimes ran out of paper and that once she had to buy more with the petty cash. She also admitted to using the money once to help pay for an office birthday cake. She did not see administrators use the money, but heard a rumor in the office that they occasionally used it for lunches and sodas. Bass did not know where the rest of the money put into Quinn’s desk went, but estimated it was about fifty to sixty dollars a week. She stated that after she returned in June 2010, there was no “change box” and all money went into the cash register.

With regard to “family trees” being sold by the office at the Grange Fair, Bass denied any knowledge of that happening during her tenure at the Register of Wills.

Bass testified that she heard rumors about the investigation into the Register of Wills while she was retired, and that these rumors were confirmed when she returned to work in 2010. Reilly was aware of the investigation and told Bass she believed it was simply a matter of low office morale and had no idea who could have sparked it. Bass explained that Quinn and Kiefer would scream at employees using profanities and move employees’ desks around the office as punishment, and as Bass believed, a vengeful way to get back at them for perceived infractions. She added that she herself experienced this when she returned from sick leave and Quinn had moved her desk as well as “taken control of the office.” While no one dictated that Quinn was in charge, Bass stated that Quinn had become the de facto “boss.” Thus understandably, Bass explained, employee morale was very low. Bass also recalled an instance where Jane Wenda was taken to the hospital after a breakdown at the office. As she remembered it though, she and Kiefer only talked to her about a misplaced file and Wenda ran out of the office, called her friend in Human Resources, and never came back. When pressed, Bass conceded that Kiefer had targeted Wenda because she had been talked about as a possible candidate for the Register of Wills.

Bass testified that employees never went to the union representative, Maryann Groninger, with complaints because she was very “tight with management”, especially with Quinn and Kiefer. She conceded that most of the complaints would have concerned Quinn and Kiefer. Several years ago, there were approximately eleven complaints made in a short period to the union, bypassing Groninger. Bass recalled that Reilly told her she would “handle it,” but nothing was ever done because Reilly trusted Quinn and Kiefer over any other employees.

With regards to the investigation, Bass testified that when she returned in 2010, the employees had mostly already been interviewed by David Rouland from the Controller's Office, and that they were upset by the entire situation. She also knew that Quinn and Kiefer were trying to get information from employees after their interviews, but did not know if they had spoken to any beforehand or told them what to say. Bass stated that she asked Einhorn about her meeting with two detectives, but "didn't try to push anything" and emphasized that she did not ask Einhorn about the "off-the-books" comp time. She claimed that her goal was just to calm her down. Bass added that just prior to the day of her grand jury testimony, Einhorn told her that Quinn and Kiefer had asked her to lie to the investigator.

With regard to the administrators' reactions, Bass denied that she was ever instructed to find out what employees had spoken to detectives about, but rather that Reilly had asked her only once, after her own interview, what they had talked about. Bass said she told Reilly that she "really can't say" but that the detectives already "knew everything", to which Reilly had no response. Bass also testified that Quinn called her twice asking where people in the office were sitting and discussing whether or not Quinn would return to the office. She admitted that there was a meeting in September of 2010 during which Reilly spoke, but could not recall if she or Quinn made any threats concerning employees who had spoken to investigators.

Bass testified that she feels very loyal to Kiefer and Reilly because they helped her when she had a heart attack at work in 2008. She added that it was very difficult to testify in front of the grand jury and that she originally did not want to be honest about the things that had happened at the Register of Wills. Bass admitted that she initially lied to detectives and denied the existence of the "off-the-books" comp time.

Testimony of Colleen Strunk

Colleen Strunk testified that she is a current employee at the Register of Wills in Bucks County, Pennsylvania and has worked there for approximately three years as a probate clerk. She stated that she was one of the three original employees who informed the county Controller's Office of the political activities going on at the Register of Wills.

Strunk testified that she did not meet with the Controller when Lisa Sutherland and Evelyn Knox went because she was afraid of retribution from the administrators at the Register of Wills; specifically, Rebecca Kiefer, Candace Quinn, and Barbara Reilly. She explained that she was "just fed up" with the mistreatment of employees and felt it was time to do something, so she offered support to the two women.

Strunk testified that she was originally interviewed for her position by Reilly, Kiefer, and Quinn. She was not politically active at the time, but she was a registered Republican. Strunk was not asked about her political affiliation or activism. After she began working at the Register of Wills, Kiefer asked Strunk to look up the voter registration records of prospective employees to determine their political affiliation and determine if they were Republican. Strunk testified that her immediate supervisor when she began working at the Register of Wills was Sheila Bass, though Quinn took over about two years ago.

Strunk also testified that Quinn had a quick temper and often acted unprofessionally towards employees. She believed that much of the persecution of office employees was dictated by Kiefer but implemented by Quinn. She described Kiefer as a “pit bull” in regards to office relationships, but “like sisters” with Quinn, and believed that Reilly knew about the way employees were treated.

Strunk testified that once she was hired, Jane Wenda almost immediately explained the “off-the-book,” or “pink book”, comp time to her. Wenda told her that if she worked the polls, she would be compensated with “off-the-books” comp time. Strunk could not recall whether Wenda told her to keep the arrangement to herself. Strunk recalled that the first election she worked after she was hired was a General Election, and that a woman from her neighborhood asked her to help at the polls. Strunk stated that management was aware she was at the polls because she was asked which location she was working on Election Day. She emphasized that if she had not already had an obligation to work another poll location, it was “understood” that she would have had to work at one in Kiefer’s district. After the election, Bass asked her how many hours she had worked the polls, wrote down the number, and recorded it as “off-the-books” comp time. Strunk stated that Kiefer and Quinn told her that the authority to award “pink book” time came from Reilly. She added that Reilly, Murphy, Quinn and Kiefer were all known to give out “pink book” time.

Strunk testified that the administrators, namely Bass and Quinn, would give “off-the-books” comp time to favored employees, often leaving the office shorthanded. She remembered one particular occasion where Quinn’s son-in-law was given comp time and paid regularly for helping Kiefer move furniture. On one occasion when the office was very busy, Quinn started giving “pink book” time for employees who worked especially hard. Strunk recalled that she declined these hours.

“Pink book” time could be used a number of different ways. Strunk testified that she had used some of her time, and how she requested it depended on who was taking care of payroll in the office. When she began working, Post-It notes were used to request time and the absences were recorded in day planner calendars kept in an office drawer. When Karen Urrichio left, Strunk took over payroll and changed the process to using the regular time-out request form and writing in “pink book time” or something similar at the top of the sheet. She then wrote it into her Day-Timer as a reference as well as entered it as “pink book” into a shared file called “Register of Wills Vacation” on the office computer network. She also kept the sign-in sheets and noted any irregularities on them. Strunk explained that she changed the system because “it was all over the place” and she wanted the requests to be in writing. She added that the administrators were fine with this change.

Strunk also testified that an employee would normally ask Quinn for her “pink book” time, but if Quinn was not available, then the employee would ask either Strunk or Peggy Swartz. If there were more than two other people scheduled to be out that day, the employee was not allowed to take “pink book” time. Otherwise, either Swartz or Strunk signed off on it. Strunk stated that once she had signed off on a request, she took the hard copy and typed it into a shared calendar on the computer network to which management had access, then placed the hard copy request into a payroll file.

Strunk stopped doing payroll after approximately one year. Strunk testified that she complained to Quinn and Kiefer about the process too frequently, and so the payroll duties were given over to Quinn and Murphy. Strunk stated that she did not want to be responsible for an illegitimate, “off-the-books” comp

system, and that she did not like having to mark absent employees as present. She explained that part of payroll was being in charge of the sign-in sheet for each day that was used to log employee hours. Strunk noticed that several employees, including Maryann Groninger and Cindy Schrode, often marked themselves down when they were not there that day, so Strunk brought it up to Kiefer and Quinn. They told Strunk not to worry about it and that she did not “need to know” if someone was running an errand for Reilly. Kiefer and Quinn emphasized that Strunk should mark the employee as present and not use any of the employee’s vacation or sick days. Strunk also recalled an instance where there were a few inadvertent errors on the payroll forms and Quinn did not allow her to correct them. Strunk insisted that she was not present for one day and did not want to be marked down for those hours, but Quinn emphatically told her not to worry about it, and signed the incorrect form. She added that after this incident, she had McCullen sign her payroll forms because “it was wrong” to do otherwise. Strunk believed that she questioned this practice too many times, and that is why payroll duties were given to Quinn and Murphy.

Strunk testified that she and Swartz were still responsible for making sure that no more than two employees were ever using “pink book” time at the same time, so she kept her personnel files and Day-Timer. Quinn and Murphy kept using the system Strunk had set up with the request forms instead of Post-Its. Strunk added that “pink book” time ended altogether just before the Primary Election in 2010.

Strunk also testified that sometime in May or April of 2010, her Day-Timer went missing. One day after she had returned from a day off, Strunk discovered that her calendar and all the other calendars from years past were missing. The payroll files were still there, as they were located in the very back of the drawer. When she asked Quinn what happened to the Day-Timers, Quinn told her “we’re doing something different now” and said that Murphy had taken them. Strunk testified that around that same time, she noticed that the shared computer calendar and Register of Wills email inbox had been erased. Quinn explained this away to her as spring cleaning. She added that in mid-May 2010, Quinn took all the personnel files from everyone in the office. Strunk believes they were shredded, as she saw Quinn doing a lot of shredding for two days around that time. She recalled seeing Quinn “pushing a gigantic shredder from one end of the office to the other” and saying she was “just cleaning.”

In addition to the shredding, Strunk testified that Quinn, Murphy and Swartz were also going around to all of the computers, copying files onto blank discs and deleting the originals from the computers. Strunk was sure that it went on for two days, did not know if anyone else did any shredding, and noted that Kiefer was not in the office while the shredding took place.

Strunk also testified about the “change box” in the office. Her understanding of it was that it was an honor system with customers to pay for their photocopies. If everyone was too busy to ring up the money on the register, the coins would go into the box. But if someone had time or a customer wanted a receipt, they would ring it up on the cash register. Strunk recalled though that “more often than not” the money went into the “change box”. On a regular basis, the box would empty, and Strunk assumed that the money was deposited. She was not aware of the money being placed in a drawer in Quinn’s desk. Strunk also testified that she witnessed Kiefer take money from the “change box” for her own personal lunch several times. Occasionally Kiefer told Cummings to use the money to go buy a newspaper and scan it for articles about Warrington Township.

Strunk testified that political work has often been done during working hours in the office. She recalled that several employees utilized their status as notaries, some signed petitions, others handled political signs and things of that nature all during work hours. She also added that Kiefer spent ninety percent of her time in the office doing work for her job as Warrington Township Supervisor, often receiving faxes, phone calls, and e-mails and asking employees to print things, register voters, or make copies completely unrelated to Register of Wills work.

Strunk testified that employees—she remembered Susan specifically—were sometimes asked to go to train stations on work days during work hours to do political canvassing. She also recalled that Kiefer asked employees to knock on doors during work hours and get signatures for her petitions. Strunk herself was asked by Quinn to help make political phone calls. Strunk was never asked to run errands for Kiefer or Quinn, but recalled that Susan Toal once had to work at Kiefer's 4H vegetable table during work hours and was paid regularly for that time. She also remembered that Karen Urrichio once became livid because she had to drive around and pick up political signs, which then got the trunk of her car dirty. This was also done on a workday for which Urrichio was paid. Strunk added that one time Urrichio took an afternoon to go shopping with Quinn and yet was still paid for the hours.

During her testimony, Strunk identified Grand Jury 14, C-12, exhibit number 10, a form used to request "pink book" time that asked for December 1-3 off for "other comp." She then identified that the computer generated calendar read December 1, "sick", with the 2nd and the 3rd as "regular." Strunk testified that it was also standard to request "pink book" time as "P comp", "use unreported comp" or "pink book time". She stated that "pink book" time was still being used in May 2010.

Strunk testified that she was concerned for her job, and walked a "really fine line." She stated that if someone complains too much, "the target gets on your back." For example, she said that employees' seats were changed and they lost job duties. In Strunk's case, after the payroll was switched to Quinn and Murphy, employees were told not to speak to her or ask her any questions. In July 2010, Strunk's desk was moved.

Strunk testified that the office atmosphere changed when word of the investigation got around. She stated Quinn threatened employees if she ever found out who reported it, saying "we will get them" on several occasions. Another employee told Strunk that Reilly said she "can't wait to meet her accusers." Strunk also recalled that Quinn and Reilly questioned employees after they were interviewed by detectives. She herself was questioned by Quinn and Reilly regarding what she had spoken to them about, and also remembered Einhorn as another employee who was questioned. Strunk said she was not told to lie to the detectives, but Kiefer did tell everyone to "remember all that Barbara has done" for the employees.

Testimony of Barbara Reilly

Barbara Reilly testified that she is employed as the Register of Wills, an elected position, in Bucks County, Pennsylvania. She has been reelected nine times, has held the office for the past 35 years, and her current term ends in 2011. Prior to becoming the Register of Wills, Reilly was a Tax Collector in Bensalem Township for eight years. Reilly initially testified that she spends three days a week in the office, then wanted to qualify her statement, saying she has been out on medical leave and works from

home. She then conceded that in the month before her testimony, she was only in the office one day per week.

Reilly testified that she is responsible for the probate of wills, attest fees, the collection of inheritance taxes for the Commonwealth, genealogical research, adoptions, guardianships, trusteeships, power of attorneys, competencies and marriage licenses. She stated she oversees a staff of between nineteen and twenty-three people, depending on per diem employees. She has a First Deputy, Second Deputy, Orphans' Court Administrator, and Register of Wills' Administrator. The deputies are statutorily created, while the administrator positions were created by the salary board under the County Commissioners. Reilly could not recall whether the administrator positions were created while she was in office, but conceded that they "may have been."

The current First Deputy is James McCullen, who has been in the office twenty years. The Second Deputy position is vacant, but was last held by Rebecca Kiefer. Reilly testified that the "pecking order" of the office before all of the vacancies was First Deputy, Second Deputy, Administrator of Orphans' Court, and another administrator whose title she could not remember. Reilly explained that Kiefer's duties were to oversee the public service program, hiring, and day-to-day workings of the office. Reilly also stated that Kiefer made managerial decisions in her capacity as Second Deputy. When asked if Kiefer could be called her "right hand" woman, Reilly asserted her Fifth Amendment right against self-incrimination.

Reilly testified that both administrator jobs are currently held by temporary appointments. Patricia Murphy is the Administrator of the Orphans' Court and Sheila Bass is the current Administrator of the Register of Wills. She stated that Candace Quinn, the actual Administrator of the Orphans' Court, is on temporary leave under the FMLA. Reilly added that Quinn's duties also spilled over into the Register of Wills, and that she answered to Kiefer "up to a point." When asked to elaborate on that, Reilly asserted her Fifth Amendment right against self-incrimination. Reilly conceded that she is the boss of the administrators, but denied that they had to "run everything they did" by her.

When asked how payroll was run for the last 35 years and whether there was a payroll system in place, Reilly asserted her Fifth Amendment right against self-incrimination. Reilly did testify that when she was first elected, Thelma Simons, the First Deputy, was responsible for payroll for about three years. She could not recall who was responsible after Simons. Reilly stated that payroll is currently performed by Murphy. Chronologically, Reilly believed that before Murphy, Karen Uricchio had that responsibility, then Colleen Strunk, and before her Quinn did it for awhile. Reilly also recalled that Bass did payroll "somewhere in there" but did not know exactly when. Reilly explained that she could not remember anyone else who was responsible for payroll because it was the First Deputy's job to assign it. Reilly testified that she could not remember ever signing off on payroll.

Reilly acknowledged that she received a subpoena marked during her testimony as GJ-14, C-12 exhibit number 13 through her attorney Michael Goodwin. Reilly also positively identified the stack of documents which she brought to the grand jury to comply with the subpoena. She first testified that she and Bass put together the documents, then stated that Bass alone found the documents, and finally clarified that Bass found some of the documents, but that Reilly herself found the rest of them. Reilly stated that the documents she handed over covered everything asked for in the subpoena, to the best of her knowledge. However, when asked if there were some documents that no longer exist that would be

covered by the subpoena, Reilly asserted her Fifth Amendment right against self-incrimination. She also asserted her Fifth Amendment right against self-incrimination when asked if she was confident that all of the documents were included from 1976 to the present.

Reilly also testified as to the audit system in the office and the system by which payroll records were kept for such audits. Audits of the Register of Wills are designed to determine whether collections and bookkeeping are in order. Payroll and cash register money are all included in the audits, and the office is required to have audits done randomly by the state and the County Controller. She explained that prior to 2002, all the records were kept by hand, and after 2003, handwritten paperwork was entered into the computer for payroll purposes. Reilly then testified that state audits require everything pertaining to inheritance taxes collections, refunds, and reporting, and county audits require the same materials in addition to payroll information. Reilly did not answer what documentation the Register of Wills kept for such audits, asserting her Fifth Amendment right against self-incrimination. She did testify however that an audit could not be completed without the requisite supporting documentation.

To Reilly's recollection, the last audit took place in 1997 and all documentation is normally kept until the next audit. However, when asked if all the payroll documentation from 1997 to the present necessary for an audit was included in the materials handed over for the subpoena, Reilly asserted her Fifth Amendment right against self-incrimination. She also asserted her Fifth Amendment right against self-incrimination in response to whether she has ever authorized the destruction of payroll documents. Reilly then stated she wanted to "qualify" her answer, and testified that she cannot remember any audits since 1997, and the last time she checked, the audit documentation folder was empty. Reilly refused to answer questions regarding what materials were kept for an audit regarding payroll from 1976 to the present on the basis of her Fifth Amendment right against self-incrimination.

Reilly refused to answer whether she ever authorized the destruction or shredding of any documents in the Register of Wills, asserting her Fifth Amendment right against self-incrimination. She testified that in the daily operations of the office, however, sensitive materials like those containing customers' social security numbers are legitimately shredded. She stated that to her knowledge, payroll records may not be destroyed unless an audit has been done; such records can include daily attendance sheets. When asked if it would be fair to say that any payroll documents not included in the stack submitted per the subpoena no longer exist, Reilly asserted her Fifth Amendment right against self-incrimination. Reilly then emphasized that to the best of her knowledge, she has complied with the subpoena.

Reilly did not answer whether there are any documents that exist from 1976 to the present covered by the subpoena that she did not turn over, but rather she testified that she has "complied to the best of my ability." She asserted her Fifth Amendment right against self-incrimination when asked if she was aware of any documents that were destroyed that would have been subject to the subpoena.

Reilly would not say whether she contacted Kiefer, Quinn, or McCullen regarding the documents required by the subpoena, asserting her Fifth Amendment right against self-incrimination. She emphasized that she was confident that she turned over all documents regarding payroll from 1976 to the present, qualifying that statement twice however, as those documents that were "in my office." Reilly acknowledged that there could be another location with additional materials, but asserted her Fifth Amendment right against self-incrimination when asked about the specifics. Reilly insisted that she

complied with the subpoena because she does not know for sure that such documentation exists, “and if it does, it is not under my control.” Reilly testified that this other location was not in her house, but declined to answer if it was at Quinn or Kiefer’s home, asserting her Fifth Amendment right against self-incrimination, saying only that “it is possible” other documentation exists.

Reilly also testified that she has not done anything to determine if such documentation exists. However, Reilly testified that she and Bass looked in “every nook and cranny” and performed a “thorough search” to compile the documents that she presented to the grand jury pursuant to the subpoena. Reilly stated that she merely searched the office for the required materials and discovered that a large number of records were missing. Reilly then testified that she did nothing when she saw they were missing. She stated again that “it is possible they could be somewhere else or that they were destroyed.” Reilly testified that when she asked Bass and Murphy where the files were, they were as shocked as she was. She then said she wanted to clarify her answer, and that she was not shocked when she found out the files were gone. When asked why she was not surprised, Reilly asserted her Fifth Amendment right against self-incrimination.

Reilly testified that she then asked Kiefer where the documents were, and Kiefer told her she did not know they were missing. Reilly added that Kiefer was “surprised.” Reilly asserted her Fifth Amendment right against self-incrimination when asked whether Kiefer gave her any idea of where the files could be, when asked if she spoke with Quinn about the missing files, and when asked if Quinn or Kiefer contacted her about the missing files.

Reilly testified that all of the electronic files from Lawson, the computerized payroll system, are available and were included in the packet of documents submitted to the grand jury pursuant to the subpoena. She stated that she did not physically look at everything she handed over, but emphasized she included “everything that was in my office” pertaining to payroll. She was then asked whether the computers were checked for files regarding attendance and payroll, to which Reilly answered “no.”

Reilly testified that documents delivered to her house were just work that she could do from home, such as budgets and templates. She added that she often communicated via conference calls from home. Reilly denied that any payroll documents were ever brought to her house. She does not know if Kiefer kept any files pertaining to Warrington Township in the office.

Reilly refused to answer yes or no to whether all documentation regarding comp time accrued by employees working election polls from 1976 to the present was turned over pursuant to the subpoena. Rather, she stated that she turned over what she had in the office, and that many files were missing. When asked whether the “pink book” documentation was included in the materials turned over to the District Attorney’s Office, Reilly stated, “I don’t have it. I don’t know where it is. I have never seen it. I have never even heard about it until this.” She then stopped, and said she wanted to “take back” that she never heard of the “pink book”.

Finally, Reilly conceded that not all of the documentation regarding payroll, attendance sheets, request forms, et cetera, were present in the materials handed over to the District Attorney’s office.

In the course of her testimony, Reilly asserted her Fifth Amendment right against self-incrimination more than 25 times.

Barbara Reilly testified that one person in the office has the responsibility for payroll in the Register of Wills⁴. She also stated that attendance is kept on paper via hard copy, and employees filled out a request sheet to take time off. Reilly explained that when she took office, employees only asked the payroll person who then reported the hours. She testified that there was no procedure given to the office from the county Controller, and added that she even asked the Controller for guidance and IT for a time system. When asked what year she requested help from the Controller, Reilly could not remember.

Reilly testified that there is currently a system in place called Lawson. She was not sure if time off appears on an employee's paycheck, but believed that time off is recorded somewhere. Reilly stated that there are many legitimate ways to earn comp time in the office, such as putting on exhibits, expos, and speaking engagements. She explained that the Register of Wills is not allowed to give overtime, so the office gives comp time for work done on evenings and weekends. She conceded that she cannot give comp time for just anything, saying, "it's not part of the structure." Reilly also stated she is not permitted to give comp time for political work, working the polls, driving a fellow employee to work, or because someone has been doing a good job. Reilly said she was "guessing" that there was a county policy about how to earn comp time.

With that instruction, Barbara Reilly appeared before the grand jury again on November 4, 2010, without the missing documents. This testimony followed.

Reilly also testified that administrators do not always have to obtain her permission to issue comp time. She stated that she gave them permission to dispense comp time if a project was "a deadline item", depending on how urgent it was. She also stated that there is no written policy for the administrators on handing out comp time.

Reilly testified that part of payroll is the written sign in sheet on which employees sign in and out of work every time. There was also an office calendar kept regarding who would be out of the office and the reason behind it, such as sick time, vacation, etc so that there were never more than two employees gone at the same time. Reilly stated that there would be hard copy originals, and the calendars were also put into final reports. She first testified that the hard copies were kept until the reporting period, but then stated that she did not know how long they were kept. Reilly also conceded that the calendar was color-coded based on the kind of time taken "in later years" but was not sure. She did not know if they were yearly calendars or not, and said it would surprise her if they were.

Reilly testified that at one point, there were calendars kept for the past 35 years of her tenure, but did not know how long they were kept. She emphasized that when she went to look for the documents based on the subpoena she received, they were not in the office. Reilly also stated she did not have any "specific knowledge. that the calendars were destroyed. No one told her that the calendars were destroyed.

⁴ After Reilly refused to answer questions before the grand jury on October 21, 2010, regarding how the payroll system was run in her office, the Honorable Alan M. Rubenstein ordered her to either produce the missing documents or answer questions regarding how payroll is completed in her office.

Reilly testified that Sue Cummings told her that Candace Quinn was getting documents from Cummings' and Reilly's offices and shredding them, but could not recall the exact date of the conversation. She stated this led her to believe these were payroll documents because of their location and her knowledge of where Quinn kept personnel and payroll documentation. She also believed that personnel records were shredded because "there were (sic) a lot of empty space" in the drawers in her office where she normally kept them, and audits were also missing. She conceded that the files also contained request forms that employees submitted for time off.

Reilly then testified that it was Kiefer who told her about the shredding. She explained that Kiefer had seen Einhorn shredding documents at Quinn's behest, and that Kiefer stopped her to find out what the papers were. She then told Reilly that Einhorn had been shredding time-sensitive documents that should never have been thrown out. Reilly added "that's when I found out shredding was being done. I had no idea to what extent." She clarified that Kiefer told her first, and Cummings told her later. Kiefer did not tell her whether she herself had shredded any documents. Reilly admitted that she did not ask Kiefer what exactly was being shredded, nor did she ask if Kiefer herself had shredded anything. She did not know whether or not Kiefer had shredded documents. She then said that she did ask Kiefer why Einhorn was shredding the documents, and Kiefer did not know. She also stated that she never called Quinn to ask why she was shredding documents.

When asked if she was concerned one of her administrators was possibly destroying evidence, Reilly invoked her Fifth Amendment right against self-incrimination. Reilly said that she tried to contact Quinn by phone when Quinn left on FMLA leave in July 2010, but she was never available. When told that the shredding occurred in May leading up to the Primary Election, Reilly stated that she was told the shredding took place in June. She denied that she was ever told about any shredding taking place before the primary, and noted that she was only in the office one day per week in May for health reasons.

Reilly testified that she did not notice the files were missing in May, saying, "Do you know how many files we have in the office?" She could not recall when she discovered files were missing.

Reilly then testified that the day before her grand jury testimony, Murphy told her that Kiefer had shredded documents. Murphy did not tell her when the shredding took place, only that Kiefer had shredded them. When confronted with her earlier testimony that she did not know if Kiefer had shredded documents, Reilly said "I never saw Becky shred documents." She said that the circumstances under which Murphy told her about Kiefer shredding documents was that "we were talking about this." She then denied that they were talking about the investigation, but said that they were talking about records. Reilly admitted that she did not confront Kiefer about being involved in the shredding.

Reilly testified that she did not look for the files when she realized they were missing, because Murphy, Kiefer, and Bass were already looking. Reilly admitted that she never got in touch with Quinn to ask why she shredded files, nor did she attempt to fire her. When asked if she has spoken with Quinn to ask her what the documents were and why she shredded them, Reilly invoked her Fifth Amendment right against self-incrimination. Reilly added that she thought the investigation would discover where the documents were.

Reilly testified that Bass put together the packet of documents requested by the subpoena. When she went through them, she realized a great number were missing. When asked whether she contacted Quinn to find out where the missing documents were, she invoked her Fifth Amendment right against self-incrimination. Reilly did state that she contacted Kiefer to ask where the missing files were. Kiefer told her there were “a lot more than that” and that she believed Quinn had shredded them. Murphy also told Reilly that she believed Quinn had shredded them. Bass and McCullen did not know where they were either. Reilly stated she never asked Einhorn where the files were. She then conceded that she did ask Einhorn, but Einhorn told her she never looked at them. Reilly never spoke with Swartz.

Reilly testified that in trying to comply with the subpoena, her attorney contacted Louis Busico, Quinn’s attorney. Reilly first stated that Quinn said she did not have the files, and then testified that she misspoke and that Busico never replied to her attorney.

Reilly testified that she was never told that people were taking information from computers and putting them onto disks. Swartz did tell Reilly that she had taken two boxes of materials to Kiefer’s car. Reilly never witnessed anyone removing boxes of files after the start of the investigation, but noted she did see Quinn take two archive boxes before the investigation began and before Kiefer told her about the shredding—sometime in May, she believed. She also added that about a week before her testimony, Sue Cummings, Diane Bochenek and Maryann Groninger told her they too witnessed Quinn taking the boxes out to her car.

Reilly then testified that she did speak to Quinn at least once since Quinn has been out of the office. She described the conversation as Quinn “hollering. and cursing at her, saying that it was McCullen’s fault”. Reilly also recalled that Quinn sounded drunk at the time, and that Quinn would not tell her what was wrong. She added that Quinn also called Groninger, Bass, and Luce later the same week to scream at them.

Reilly testified that the office is “buzzing” with a rumor that Quinn has immunity. She stated her attorney told her Quinn had immunity.

When asked if she had spoken to anyone regarding the case, Reilly emphasized, “They have come to me and talked to me.” She admitted that the day before her grand jury testimony, she spoke with almost every employee in the office. Reilly testified that she spoke to them about the case. When asked if she recalled taking an oath to keep grand jury proceedings secret, Reilly invoked her Fifth Amendment right against self-incrimination.

Testimony of Evelyn Knox

Evelyn Knox testified that she started working at the Register of Wills in October 2007 as a per diem employee. Approximately one month later she was hired as a full time employee. Since then, she has held positions in the office as archivist and probate clerk.

Knox testified that she is a committeewoman for Upper Southampton Township, an Executive Republican for Bucks County, and active in politics. She stated that she has always been registered

Republican. She was not asked about working the polls on Election Days during her initial job interview at the Register of Wills.

Knox explained the use of “off-the-books” comp time, also known as “pink book” time at the Register of Wills. She testified that employees received “under-the-table”. comp time for working the polls at Primary and General Elections. Administrators kept track of this time on records in the office, and did not report it to the Controller’s Office. She added that sometimes it was straight time, while other times it was time and a half. Knox explained that “it all depended on who you were, who you knew in the office, what mood they were in” whether it was time-and-a-half or straight comp time. For example, she stated that Quinn gave people she did not like straight time only, but if she were in a good mood, she would give those who worked hard time-and-a-half. Knox added that Quinn also gave “pink book” time to employees for working hard on projects or for doing traveling probates. Quinn and Kiefer told employees not to discuss “pink book” time outside the office. Knox was never told directly by Barbara Reilly, because “she (Reilly) was only in a couple times a month.”

Knox testified that Shawn Rose, Quinn’s daughter’s boyfriend, received “pink book” time while he worked at the Register of Wills. She stated that Rose worked an election for McCullen on weekends, and bragged about receiving “pink book” time while at the office. She recalled that he would tell other employees, “I worked for Jim on Sunday, and Candy said I could have ‘pink book’ time.”

Knox explained how employees used their “pink book” time. She testified that when she first began working at the Register of Wills, Sheila Bass went around to everyone and asked which polls each employee worked and for how many hours. This information was then written down in the “pink book”. Knox stated that after Bass retired, she believed Murphy and Strunk took over that responsibility. To use “pink book” time, the employee would either ask in person, call, or give a sticky note to Murphy, Quinn, or Kiefer, depending on who was in the office at the time. For a while, it was permitted to use an entire day’s worth of “pink book” time, but Knox explained that at the end of 2008, the policy was changed to allow only partial-days.

Knox conceded that she earned approximately 68 ½ hours of “pink book” time, most of which she used. She added that she kept her own calendar in the office and kept track of which days she took off. She positively identified Grand Jury 14, Investigation C-12, exhibit number 14 as her calendar book from 2009. Knox confirmed that she took approximately fourteen different days on which she took “pink book” time for doctor and dentist appointments. She explained that she used some of those days to take her sons to the doctor, one of whom has Crohn’s disease. February 12, March 9, March 11, May 5, June 16, July 8, August 3, 5, 11, September 10, 21, October 20, October 26, and December 10, 2009 were all days that she would have taken off with “pink book” time or sick time.

Knox also testified that after the May 2010 Primary Election, she learned that no more “pink book” time would be given to employees. She believed one of the other employees told her, but could not remember who it was.

Knox testified that the office used a “change box” to collect copier fees paid by customers who wanted to copy records. When she first started working in the office, money for which there was no receipt was supposed to be put into the “change box automatically.” Knox witnessed both Einhorn and Quinn dump

the box into Quinn's desk "a few times", always at the end of the week. She also saw both Kiefer and Quinn take money from the box to buy soda, but not for lunch deliveries. She never saw them return any money to the box. Knox added that employees joked about them taking money, "like, they can't afford a dollar twenty-five for a soda." She estimated that in three months, about \$1700 to \$2000 was collected in the "change box." Knox explained that since the "change box" has stopped being used, they have been collecting more money every fiscal quarter than was collected while the "change box" was used.

Knox testified that Kiefer asked her to do background checks and voter registration checks on people who applied for jobs at the Register of Wills. She added that Kiefer also had her check those whom she was considering hiring "for some kind of board in Warrington Township." She recalled that she was specifically supposed to check whether they were Republican or Democrat, and write it down for Kiefer. Knox stated she never followed up on those who were hired for Warrington, but noted that to her knowledge there are no Democrats working in the Register of Wills.

Knox testified that Cindy Schrode once went to Delaware Valley College to pick up fruit for Kiefer and was paid as if she was working. Knox was not aware of any other errands Schrode did for Kiefer. She did recall that Schrode was once sent to Kiefer's house to wait for the cable repairman, but that Schrode had to leave because her grandmother was sick. Kiefer then asked Connie Siracusa to go to her home to replace her.

Knox also recalled that phone lists were passed around the office. She testified that Quinn handed out phone lists for a Republican political campaign before the May primary, and asked them to make calls into an area that she was handling. She added that on one workday, Quinn and Kiefer went to that area for an entire day to knock on doors. At one point that day they called the office and asked Pat Caimano to take something to the city for them. She recalled that Caimano said, "I have to go. I just have to leave." McCullen then told the other employees "she had to run an errand for Becky and Candy." Knox stated that later that night it was on Facebook that they had been door-knocking.

Knox testified that around May 14, 2010, she saw Quinn and Einhorn shredding a large number of documents in the office. She described it as "just bags, and bags, and bags, and bags" of shredded documents. She did not know what they were shredding, but noted that they took several boxes into the back room. Knox also heard that Swartz was helping Murphy delete computer files, but did not see it. Knox believed the directive to shred the documents came from Kiefer and Reilly.

Knox also testified that Maryann Groninger was the union representative, and that Knox never felt comfortable filing a grievance with her. She explained that the one time Lisa Sutherland tried, Kiefer came over to give her the paperwork when the whole point of the grievance was so that Kiefer would not know it was her. Knox explained that Groninger was good friends with Kiefer, Reilly, and Quinn.

Knox testified that after Karen Urrichio left, she and other employees went to talk to Human Resources about the office environment and retaliation. They did not put anything in writing because they were afraid the retaliation would get worse.

Knox testified that nobody told her not to speak to Investigator Rouland regarding the investigation, stating that she was out on FMLA leave in June. She believed Quinn was trying to talk to her, because

she called her often and attempted to get Knox fired. Knox explained that Quinn told her she did not need to call into the office while her FMLA paperwork was being processed, saying “don’t even call me... call me later.” Knox later found out that Murphy had sent an email to Human Resources saying that Knox had abandoned her job at Quinn’s request. Since she returned from FMLA in August, both Kiefer and Quinn have left the office, though Murphy and Bass are still there.

Knox testified that Murphy and Bass are currently in charge of the office day-to-day, and that McCullen “doesn’t want to do anything to upset” Reilly, saying, “he won’t stand up to her.” She stated that shortly before her grand jury testimony, McCullen called a meeting with her, Strunk, Cummings and Benscoter. He told them that Quinn wanted to come back to work, but that Reilly did not want her back in the office and “there are things we can do” to help Reilly. He asked them to write down how terrible Quinn was in the office. Knox said that Strunk, Cummings, and Benscoter refused because they believed it would jeopardize their grand jury testimony. Knox did not say anything to McCullen because she had not been to the grand jury yet. She added that McCullen reiterated several times, “We have to help Barbara out. We really do. What can we do to help her?” Strunk suggested they eliminate Quinn’s administrator position and let Quinn return as a probate. McCullen took this idea to Reilly, but told them later that Reilly did not want to help Quinn, saying it would not help because Reilly was still going to lose her pension and her house.

Knox testified that since the investigation began, the office has turned extremely tense. She stated Reilly has been blaming various employees, saying she cannot trust anyone in the office. Knox also stated that administrators took away breaks, hour lunches on Fridays, and dictated that everyone had to have a witness sign them back in from the bathroom. She testified that at first, Reilly, Kiefer and Quinn were all blaming “a rat in the office” for the investigation. When they could not find the whistleblower, the attitude changed. Knox stated that lately, Reilly has been trying to place the blame entirely on Quinn, while Quinn has been trying to blame Reilly and Kiefer. Knox added that Reilly told Bass and McCullen that Quinn had immunity, and they related that information to the rest of the employees.

These restrictions were not in place prior to the investigation, but Knox explained that there were other tense moments. For example, she stated that Kiefer and Quinn sometimes screamed at employees no matter who was around and treated some as “dirt.” She also added that they screamed at employees so much that some cried or had to go the hospital, citing Jane Wenda as an example.

Knox testified that she spoke to Reilly the day before appearing for her grand jury testimony. Prior to that, she could not remember the last time she spoke to her, but said it was at least a few months. Reilly asked her whether she remembered Quinn taking files out of her office, and Knox said no. Reilly then asked her whether anyone else would remember it, and Knox suggested that Reilly’s friends Schrode and Swartz might remember, but she did not. Reilly finally asked her whether she saw Quinn shredding documents, and Knox said that she did. Knox did not speak with her about anything else. She added that she had seen Quinn take files out of Reilly’s office before, but that these were normal probate and estate files. Knox stated she lied to Reilly because she did not want to deal with her. She never saw Quinn take personnel or payroll files.

Knox denied that she was ever called into an office after speaking with Rouland or detectives about the investigation. She also denied that anyone had ever talked to her about what to say in front of the grand jury, including Bass and Reilly.

Knox testified that she is unaware of any other politically-driven public office in the county.

Knox testified she believed Reilly is the most culpable person in the office because she knew what was going on, ran everything, and gave instructions via the administrators. All of the memos concerning office changes were carbon copied to Reilly, and Knox believed that Reilly instituted “pink book” time “years and years” ago.

Testimony of Margaret Swartz

Margaret Swartz testified that she is currently employed in the Orphans’ Court under the Register of Wills as a senior adoption agent. She has been working there for five years, during which she has taken fifteen months of leave to work in Domestic Relations while attending two semesters of law school. She has been back in the Register of Wills for approximately a year. Swartz stated during her entire tenure at the Register of Wills, Barbara Reilly has been the elected official who runs the office.

Swartz testified when she first applied for a job, she enlisted political support. Reilly told her later that she would not have even gotten an interview without a political recommendation.

Swartz also testified she is a registered Republican, although she was a registered Democrat until 2001. She was hired after she changed her voter registration to Republican. Swartz recalled that Reilly, Quinn, and Kiefer had interviewed her for her position. She added that Sheila Bass may have been there, but she was not sure.

Swartz testified she is currently under consideration for a possible promotion to be an administrator. She stated she had grown very close to Reilly, Quinn, Kiefer, Bass, and Maryann Groninger and conceded that she has been in good standing with management during her entire employment at the Register of Wills.

Swartz testified that she first became aware of “pink book” time in November 2005, a few months after she started working there, when she was told that she could get comp time for working the polls. Swartz stated she never worked the polls before, but added she “didn’t really have a choice.” She explained that Bass would go around with a list and ask employees if they were scheduled to work the polls on Election Day. If they said no, she would ask them, “Would you work this one for us?” with a tone that implied you had to do so. She added that McCullen has always made it a point to leave the office when he performed political activities.

Quinn and Kiefer also told her not to talk about the comp time. Swartz testified Quinn told her that she was not supposed to talk about it because “it’s ‘off-the-books.’” She denied that Reilly ever talked to her about “pink book” time, but stated Reilly is aware of the investigation and knew that Swartz was testifying. Swartz testified that she does not know “how she could not know” about “pink book” time because Reilly was “always” on the phone with Quinn and Kiefer. The “pink book” was also kept in a

locked drawer in Reilly's office. Swartz stated that in addition to Reilly, administrators also had keys to the drawer, including Murphy, Quinn, Bass, Kiefer, and possibly Groninger.

Swartz also testified that Strunk was in charge of payroll for some time before the request slips, personnel files, and calendars were taken away from her. Strunk's calendars contained notes of every employee who took off time, both legitimate and "off-the-books", and color coded it, such as using pink for "pink book" time. These calendars were taken from Strunk's desk overnight, and the next time Swartz saw them they were on Murphy's desk. The personnel files were given to Murphy and Quinn. Swartz explained that she took over payroll around January 2010 after training with Strunk for two weeks. After she took over, employees put their "pink book" time request on Post-It notes, though Swartz admitted that employees may have noted "pink book" elsewhere, such as on a request form. She denied having control of the "pink book", but admitted she did have access to it. Swartz stated she could go into Reilly's office to check how many hours of "pink time" a particular employee had "on-the-books". She also stated she had the personnel files for Orphans' Court for a time, but they were taken from her once she stopped doing payroll and she has not seen them since.

Swartz also testified that on at least two separate occasions, Constance Siracusa and Eileen Aiken asked her how many "pink book" hours they had accumulated. On each occasion, she had gone into Reilly's office. Swartz added that the "pink book" had previously been kept on Quinn's desk, but was moved to the locked office when payroll duties were removed from Strunk. She believed that Strunk was relieved of her payroll responsibilities because the administration no longer trusted her and because Strunk was "bitter" about not being promoted. Swartz recalled that co-workers "made it sound like she had been actively working against Becky and Candy" and that Strunk was blamed for the investigation.

Swartz testified that Reilly called her the day before her grand jury testimony. At that time, Bass had been going around the office saying Reilly was on the phone and "wants to talk to you." Eventually Bass brought the phone to Swartz and gave it to her to speak with Reilly. She recalled that Reilly asked her how she was doing, and then asked, "Do you believe I knew about the 'pink book'?" Swartz replied that she did not know what to believe, particularly considering that administrators told them Reilly was giving them directions and Reilly was on the phone with the administrators constantly. Reilly then told her she did not know about "pink book" time, and "started rambling" that she did not know how it started. Swartz told her it has always been that way as long as she worked there, to which Reilly asked where the "blame" was coming from. Reilly then told Swartz that McCullen might be at fault.

Swartz emphasized that McCullen is not involved in the day-to-day operation of the Register of Wills. She also testified Quinn and Kiefer were in charge of the office on a daily basis, and that they repeatedly said that they got their directives from Reilly.

Swartz admitted that she was present during the illegitimate office "shredding party", and noted that she did not remember shredding anything herself. She then conceded that she often shredded things during the course of her job and would shred documents given to her by administrators. The day when there was illegal shredding going on, Swartz recalled that Kiefer and Quinn were "panicking" and trying to get rid of files. Kiefer and Quinn packed up files, old political records, and folders that were then taken out of the office. Other political literature and payroll records were shredded. Swartz emphasized she did not remember shredding anything herself and was not present when the records were shredded, rather Quinn told her that she had

shredded them. Swartz noted that after the shredding day, the “pink book” was gone and Quinn said she had destroyed it. She explained that Quinn was speaking to Murphy, Bass, and possibly Kiefer at the time and she had overheard Quinn from her desk.

Swartz testified again that she could not remember shredding documents the days of the “shredding party.” She then admitted that she did shred things that day, but only political and election materials, and nothing involving payroll. Swartz recalled that Quinn took all of the payroll documents from Reilly’s office. She was also told that personnel files were destroyed during the “shredding party” for reasons related to the confidentiality of employees’ medical information, though she did not witness it herself. Swartz testified she believed the given reason was merely an excuse to shred the files.

Swartz did not remember asking Quinn why, but believed they may have been trying to hide “off-the-books” comp time and the “pink book”. She stated she believes it is a crime to shred documents of that nature. She also recalled that the “shredding party” took place over three or four days.

Swartz also testified that during the “shredding party,” Quinn and Kiefer were also very concerned about who had access to the time off calendar on the network. She then testified that they were also concerned about employees having access to the adoption computer drive, but admitted that “both projects were being done.” Swartz finally conceded that “it’s probable” Quinn and Kiefer were more concerned about the “pink book” than the adoptions issue. She explained that Strunk kept a computer calendar to ensure that there were never too many employees taking time off simultaneously. Strunk would mark off “pink book” comp time in pink color, or with a notation of “pink.”

Swartz testified that because Quinn and Kiefer were concerned about access to the calendar, she was told to make a list of everyone who had access to it and hand it over to Murphy. Murphy has since told Swartz that she deleted the calendar. When asked if she herself deleted documents, Swartz answered she helped Kiefer copy documents from the database that were related to Warrington politics. She copied and pasted the documents onto a CD, but denied that she ever deleted them. Swartz emphasized that, “I felt fine helping her copy documents because I know that doesn’t disappear from the computer if you delete it, especially from a network drive.” She believed Kiefer later took the CDs from the office.

Over the course of the “shredding party,” and around the time the computer files were deleted and copied, several boxes of files were also removed from the office. Swartz testified that she removed approximately twenty-four boxes from the Register of Wills over two months and placed them in Kiefer’s car. Swartz added that while she occasionally removed boxes from the office to put in Quinn’s car, they were only for probates.

Swartz also testified that she is aware of the “change box” kept underneath the counter that was used for money that was not put into the register for copier fees. She denied knowing whether Quinn or Kiefer ever took money for themselves from the “change box”, though she did witness people make change from the box. Swartz then recalled that Quinn took money from a box in her desk drawer that she called a “petty cash box.” She denied that she knew the “change box. money was ever dumped into Quinn’s desk, though she has heard about it since the investigation started.

Swartz testified that she could not recall what was done with the “change box” when an audit was done on the office. She added that it was locked in a safe at the end of the day, but emphasized that she was only present for one audit and did not know what happened to the box during that time. Swartz stated after the investigation began and the Controller’s Office began asking about the “change box”, signs went up in the office mandating that anyone who pays for copies get a receipt. Additionally, all money now goes into the cash register. She stated she would not be surprised if revenues had gone up since the signs were put up.

Swartz testified that she could not recall doing personal favors for anyone on county time except for on one occasion when Quinn asked her to watch her two year old grandson during work hours.

Swartz also testified to Reilly’s relationship with Quinn after the investigation began. She explained that a rift between the two did not become apparent until a rumor emerged that Quinn had been given immunity. Swartz recalled that Quinn went out on leave just as the administration found out about the investigation, and Quinn was also the first to retain a private attorney. Swartz noted that Quinn decided not to get an attorney with Kiefer and Reilly, the supervisors’ original plan, after a conversation with the two of them in which Reilly blamed McCullen and said “everything was coming from Jim.” After that conversation, Quinn thought she might get “thrown under the bus”, so she got her own attorney.

Swartz testified she was not aware Reilly was sworn to secrecy for her grand jury testimony. She acknowledged that she herself has been sworn to secrecy regarding her testimony. Swartz stated she did not remember certain events during a previous interview with Detective Langston, but could recall them during her testimony.

Swartz testified she put up political signs during work hours with Karen Uricchio once in 2007 and on another occasion with Quinn, perhaps also in 2007, but she was not sure of the year. She also recalled a third occasion on which she, Quinn, and Kiefer went around pulling down Kiefer’s political signs during work hours. Swartz also recalled that Kiefer told her to design political fliers on county computers, print out political literature on county printers, and stuff political envelopes for Reilly in Reilly’s office during work hours. Some of the work was done after hours. Swartz added that if she got any overtime or pay for doing this political work after hours, it would have been “pink book” comp time.

Swartz testified there were several other ways in which employees could earn “pink book” time. For example, she received “pink book” time for driving Maryann Groninger around at Quinn’s request. Swartz stated she drove Groninger for two weeks, approximately one hour each day, and received ten hours of “pink book” time. Quinn approved the “pink book” time, though Swartz was not sure if Kiefer or Groninger were aware of it.

Swartz positively identified Grand Jury 14, C-12, exhibit number 15 as a packet of request slips from July 2010. She testified that she handed the forms over to detectives approximately a week before her grand jury testimony. There were no forms with “pink book” written on them because they were all generated after the “pink book” was destroyed. Swartz also identified an older request form from February 2010 that was attached to exhibit number 15 that had also been handed over to detectives. Swartz added that she also provided medical records from various doctors’ appointments that she went to during work hours and for which she used her “pink book” time. So while investigators would not be

able to see her request form, she could show them that she was not in the office and detectives would be able to cross-reference that information with payroll records.

Swartz also testified that she and other employees used their “pink book” time for leaving work early or coming in late. They would still be paid regularly for a full eight hour day even though they were not present that long.

Swartz testified that since the investigation first began, the office environment has become tense and nerve-wracking. Currently, she said the office has relaxed a bit, explaining, “I think part of that is because Candy has been on medical leave” and Kiefer has resigned. Swartz also noted that her friendship with Quinn has changed dramatically since the investigation began, and said, “it’s hard on what to say to her, and she asks questions that I don’t think she should be asking.” She also finds it hard to trust Quinn because of the rumor that Quinn has immunity. Swartz also stated that “Candy started to become a scapegoat almost right away”, even before the immunity rumor surfaced.

Swartz also testified that she believed Bass was brought back because she was loyal to Reilly and Kiefer, and that the reason given – that she was helping with the workload – was just an excuse. She described it as “very suspicious” that Bass came back to the office just as the investigation got underway. Swartz believed that Bass is in the office to keep an eye on everything at Reilly’s request.

Swartz testified that Quinn and Kiefer were very involved in the “strategy sessions” with Reilly that took place before the investigations. McCullen was never in those meetings. She also stated that some directives probably came from Kiefer alone, others from Quinn alone, and some solely from Reilly. Swartz stated, “It was definitely coming from that core group of people.” Swartz denied that she was part of the strategy sessions or that administrators ever spoke to her regarding the investigations. She then clarified and said they all discussed their initial interviews with the Controller’s Office with each other when Quinn and Murphy called them into a meeting.

During the meeting, “the implication was to try and protect the office”, though no one specifically told her to lie. Swartz added that she was told to do whatever she could “to protect Barbara.”

After her own interview with Investigator Rouland, Swartz was called into a meeting with Kiefer, Quinn and Murphy who asked her what she had spoken to him about. Swartz testified that she lied to the administrators and said she did not give any answers, at which point they seemed happy and proud of her. She first testified that she never spoke to Reilly about her interview with Rouland, though she did ask Reilly if she could go home early because she was “shaken up” that day. However, she later testified that Reilly was on the speakerphone during the meeting with Kiefer, Quinn and Murphy. During the conversation, Reilly exclaimed, “What the hell is a “pink book’?” Kiefer also denied knowing what the “pink book” was during the meeting.

Swartz testified that she is not sure if Reilly knew what the “pink book” was. When Swartz last spoke to Reilly she was acting like she did not know about the “pink book”. Whenever administrators gave out “pink book” time, employees believed that it was ultimately coming from Reilly. She also added that Reilly not knowing about “off-the-books” comp time “is what I find hard to believe.”

Swartz also testified that she told Reilly she was going to be honest when she testified, and did discuss the “pink book” with her about a week before her grand jury testimony. At that point, Reilly asked her what the “pink book” was and what it looked like. Swartz believed someone must have told Reilly that it contained “off-the-books” comp time at some point, but did not hear it herself.

Swartz testified Reilly has made general statements about wanting to face her accusers in court, and “get back at whoever in this office did this.” She explained it was understood that Reilly was going to fire the employee who “ratted her out” or was going to take political retribution on that person. Swartz stated Reilly currently believes Sutherland, Knox, Strunk or Benscoter “ratted” her out. Also recently, Quinn has been hostile towards Strunk. She emphasized that Strunk and Sutherland may have been moved around the office because of poor work performance. Swartz hesitated to call the chair in the front of the office the “naughty chair”, and said she understood that there is a rational reason for moving someone to that seat, though she did not elaborate what that could be. She conceded that she recently got into an argument with Sutherland about lunch breaks for which Murphy later wrote Sutherland up. Swartz then stated there was a meeting between McCullen, Murphy, Bass, and Reilly on the speakerphone about the write-up where Sutherland objected about the punishment and then filed a grievance.

Swartz testified that Reilly is responsible for the office and whatever took place in the office was ultimately Reilly’s responsibility. Reilly never told Swartz that she was going to lose her pension and her house, though Swartz had heard that Reilly had been saying that to other employees.

Testimony of Shawn Rose

Shawn Rose testified that he worked at the Register of Wills for approximately two to four months. He also stated he has been dating Candace Quinn’s daughter Megan for two years and has a fourteen month old child with her. He is very close with the Quinn family. Rose conceded that he lived with Quinn at one point, but now lives with her daughter Megan.

Rose testified that he was laid off from his construction job around the same time he found out Megan was pregnant. He was having trouble finding work when Quinn told him there was a temporary job opening up in the Register of Wills. She told him that he would be doing filing and digitizing books for Orphans’ Court—primarily computer work. He also helped Einhorn with filing and Murphy with updating old documents onto the computer. Rose stated that he was interviewed for the position by Kiefer, Quinn, and Murphy.

Rose first testified that he worked full-time hours from 8:00 AM until 4:30 PM every day. He then conceded that a few days when he rode in with Quinn, he was late. He emphasized, however, that he was only paid for the hours he was at work. Rose then testified that he was late for perhaps ten days when he carpooled with Quinn, and finally he stated that he was probably late twenty-five percent of the time. Rose stated he always signed in and out when he came and left the office.

Rose then testified that for the first two weeks he worked at the Register of Wills, something was wrong with his paperwork and he was not paid. He stated he was told that he could take time off to make up for those two weeks, but only if he came into work and signed in so that the sheet would show he was present. Rose was adamant that he was not paid for the first two weeks, but thought eighty hours

sounded like too much. He claimed he only signed in, then left twice, to take his girlfriend to the hospital. For those days, he said his paycheck would reflect that he was at work all day. Rose stated that he would give a note to Strunk, who was in charge of payroll, and she told him that she would “take care of it.” He never had to fill out any forms to sign in and leave for the day.

Rose testified that he sat in the back room with Einhorn and used his computer to make labels and do other clerical work. He stated that the only time he ever did political work was over his lunch break because Groninger asked him to help stuff envelopes for McCullen.

Rose testified that the only time he was paid to move furniture was when the office rugs were shampooed. He admitted that he helped Kiefer put up Christmas decorations, but insisted that it was after hours and he was not paid for it. He also stated that he helped decorate the office for Halloween during work time, and thus he believed he was paid for it.

Rose testified that he did not have access to a DVD player while in the office, and then stated that his computer had DVD capabilities. He emphasized that he only ever used his work computer for music, not DVDs. He explained that he would hook his iPod up to the computer to play music while he worked. Rose denied twice that he ever watched Ren and Stimpy cartoons on the computer, then admitted that he had.

Rose testified that he never heard of the “change box” in the Register of Wills. He knew nothing about “family trees”, but testified that he sometimes saw employees rolling up “money trees” and placing them in boxes when they had down time. Rose stated he never had down time. He never saw the “money trees” being sold.

Rose denied that he ever worked on McCullen’s campaign to become Bristol’s Mayor. He stated that he never put up any political signs for McCullen, and never bragged that he received “pink book” comp time for working on McCullen’s campaign. Rose specifically testified that he never worked for McCullen’s campaign on weekends. He added that if he ever did put up a sign for McCullen, it was only in Quinn’s yard.

Rose denied that he was ever told he would receive comp time if he worked the polls or that he had ever heard the term “pink book” before. He claimed not to know anything about a “pink book” being destroyed. He then conceded it would not be a lie if someone testified that Quinn had promised him “pink book” time and that he knew what it was. Rose then denied he had any idea of what “pink book” time was. He said that if he had to guess, he would say it was “illegal time for comp time... I guess they would work for them using the courthouse money”, but then added that he did not know. Rose then said he heard what the “pink book” was from the newspaper. When told the newspaper did not have anything about “pink book” time in it, he again claimed, “I never heard that they had a “pink book’.”

Rose first denied that he spoke with Quinn before testifying, and then admitted he spoke with her the day before his grand jury testimony. He stated he only called her to ask her if he should get an attorney. She told him to “just go up and answer their questions.” He added that she never told him to lie, and that she never spoke to him about the investigation because she did not want to get them in trouble. Rose

stated he never received phone calls from Reilly or Murphy. He said he spoke to Murphy the day of his testimony to get directions to where he was supposed to testify.

Rose testified that he was not aware that Quinn was suspended from work, but did know that she wanted to go back to work on November 15, 2010 and believed she would be back. He claimed that he never discussed with her why she did not go back to work, but assumed she was not working because she babysat for him once that week during the day. Rose stated he did not bring it up with Quinn because he has “such a headache about what’s all going on.”

Testimony of Karen Uricchio

Karen Uricchio testified that she was employed at the Register of Wills from 2005 to 2009. Uricchio stated that she first found out about the possibility of a job in the office while she was out shopping in 2004. While out, she saw an old co-worker from the Treasurer’s Office, Donna Warner, shopping with Becky Kiefer. Uricchio stated this was the first time she had ever met Kiefer. During their conversation, Kiefer told her that some entry-level positions might be opening up at the Register of Wills in the winter, and to keep in touch. Uricchio testified that she did keep in touch with Kiefer and eventually two positions opened for marriage clerk and probate 1 respectively.

Uricchio also testified that prior to working at the Register of Wills, she was employed in the Treasurer’s Office of Bucks County, as a mortgage broker, and then took a break to have children. During her four years in the Register of Wills, she worked on marriage licenses and adoptions. She was promoted to senior estate agent working with the court, judges and attorneys. She was out of the office for periods of time due to various health problems during her tenure.

Uricchio testified that she was interviewed by Barbara Reilly, James McCullen, Candace Quinn, Sheila Bass, and Becky Kiefer. She denied that anyone ever asked her about her political affiliation during the interview, but added that “they all pretty much knew it” because some were familiar with her parents, who were very involved in Republican politics. Uricchio stated she is a registered Republican. Within two weeks of the interview, she was hired as a marriage clerk in February 2005.

Uricchio could not recall exactly when she was first told about “pink book” time, but stated it was around the first election after she was hired. Uricchio testified that Quinn and Kiefer were likely the employees who told her about it. Later in her employment, Uricchio and Quinn created the “pink book” together. “pink book” time was “off-the-book” comp time that she always referred to as “pink book” time, though she added that others could have just called it “off-the-book. time.

Uricchio testified that knowledge of “pink book” time was supposed to be kept just inside the office, and noted that the Orphans’ Court employees referred to it as “secret comp time.” She explained that in the past “other people opened their mouths” and they lost “pink book” time for awhile, so employees did not like to talk about it. Eileen Aiken told her it had been reinstated by the time Uricchio began working there. Uricchio testified that even though she was told not to discuss it outside the office, she was never told not to discuss it with Reilly or McCullen. When asked if Reilly knew about the illegitimate comp time, Uricchio responded, “Barbara knew everything that went on in that office.” She was unsure if McCullen knew

because he is out of the loop. She explained that McCullen was made First Deputy when Reilly began at the Register of Wills, and even though Kiefer has taken over his responsibilities, he still holds that title.

Uricchio testified that she probably worked the polls at the Primary Election in 2005, but could not recall for sure. She explained that Quinn, Kiefer or Bass would go around the office and “put you” at polls in an area close to home. Uricchio herself volunteered for any location because her kids were in school on Election Days. She explained that one of the supervisors would put employees down for four or five hours. Uricchio also recalled that at various points, Kiefer, Quinn, and Bass told employees that they “had to work the polls. It was not a day off. It was not a day for you to go make appointments to see your doctors. It was not a day to go shopping. Everybody had to work the polls.” She could not recall if Reilly ever told employees they had to work the polls, noting that she did not see Reilly in the office very frequently.

Uricchio testified that Kiefer was “real big with” working the polls, and said it had to do with her Warrington position.

Uricchio testified that when she first started, Bass came around after the Election Day to ask employees how many hours they had worked and then recorded it in a book. Uricchio noted that she did some of the work with the “pink book” when she handled payroll as an estate agent. She believed Quinn did payroll before she took over that responsibility because Quinn taught her how to do it. Uricchio stated she handled payroll for approximately two years. During that time, employees told her when they wanted to use vacation time by filling out a request sheet. Uricchio would then make a copy and have it signed by Kiefer or Quinn, whoever was head of that employee’s department.

Uricchio testified that for “off-the-book” comp time, employees gave her a slip of paper asking for time off, which Uricchio then gave to Quinn to initial. After Quinn approved it, Uricchio would mark those hours off in the “pink book” which was a blue book with pink sheets of paper. Each piece of paper had the employee’s name on it with how many total hours and deductions. Uricchio explained she marked that employee as present for regular time when they took “pink book” time. She also emphasized that she has seen the “pink book”. She stated it was located in a cabinet by Quinn’s desk, in the back, right-hand section of the office. It was a blue, vinyl, three-ring binder with pink pages. Employees’ pages were arranged alphabetically.

Uricchio also testified that while she was doing payroll, she would mark people as present who were actually out with Quinn or Kiefer doing work or activities unrelated to the duties of the Register of Wills. She could not recall specific dates or names of other employees, but admitted that she herself was paid regularly when she worked on a Salvation Army project with Quinn during office hours. Uricchio specified that the Salvation Army project had nothing to do with the Register of Wills. She also admitted to putting up political signs with Swartz for Reilly during work hours and stuffing political envelopes with Groninger, Strunk, Murphy, and Swartz during office hours, all while being paid regularly. Uricchio noted that they always stuffed envelopes in Reilly’s office so that nobody would see them doing it during work hours. Groninger also encouraged employees to go to Republican Headquarters to work during their lunch break.

Uricchio testified she never heard of someone getting “pink book” hours for doing a good job. She added that while they were working on political activities at the office, nobody was covering for their responsibilities, so county work was not being done. Uricchio testified that she got along well with Quinn, Kiefer, and Bass. Uricchio conceded that she was “in” with management and said that as a result, employees were nice to her or “they’d get crap from” supervisors. She also admitted that she was able to take liberties with her job because she was friendly with management.

One such liberty was being allowed to take a full day with her “off-the-books” comp time. Uricchio testified that she was permitted to take a full day because she was “in” with supervisors.

Uricchio testified that she stopped doing payroll in the summer of 2008 when management “just seemed kind of odd towards me” after she was trained for the new computer payroll system, Lawson. She recalled that Kiefer and Quinn told her she was “messing everything up again” so they took her off payroll. Uricchio explained they might have said this because she was having a difficult time completing her responsibilities with Quinn “never in the office” and little staff support. She was then taken in front of Judge Fritsch for explanation, after which Reilly demoted her two pay levels. Uricchio explained that her mother spoke to Reilly about it because they knew each other, and Reilly told her that she would compensate Uricchio “under the table” to make up the difference, but never did.

Uricchio testified that a few months after being demoted, she asked Quinn if she could move back up again. She and Quinn got into a fight, after which Quinn left the office. Uricchio left soon after, and while walking out she felt a strange pain, weakness, and numbness on the right side of her body. She explained she had had a stroke and only just made it to Doylestown Hospital.

Uricchio described the work environment as backwards and tense because of the way Kiefer ran the office. “It was just an awful place to be.” Uricchio also stated that Kiefer had regularly yelled and screamed at employees for as long as Uricchio had worked there.

At various points during her testimony, Uricchio had to repeat herself or stop and reorganize her thoughts. She explained that she has had a number of health problems, including a stroke, and explained that it is difficult to testify because “very seldom do you ever get acknowledged for anything” in the office, and towards the end of her tenure, Kiefer and Quinn made her “look like a laughing stock.”

Uricchio also testified regarding the “change box”, something she also referred to as “Becky’s lunch box” because that is where the money went. She explained that when customers made copies, the money they paid for the copier fees went into the “change box”. Once it was full, Einhorn made a deposit and sent it to the bank. Uricchio added that Kiefer would take money out of the box and buy her lunch. She never saw Quinn take money from it for herself, though she did see Quinn take money out for Kiefer. She also saw Cindy Schrode take money out for Kiefer. Uricchio was not aware that money was not deposited.

Uricchio testified she was not aware of “family trees” ever being sold at the Register of Wills, and noted that she left the office before the investigation began. She first became aware of the investigation before it was in the newspaper, when the Controller’s Office was investigating. She testified she never received any phone calls from Reilly, Kiefer, or Quinn regarding the investigation. Prior to her grand jury

testimony, she was interviewed by Detectives Langston and Lachman. Uricchio emphasized she was not contacted before or after speaking with detectives by anyone in the office.

Testimony of Patricia Murphy

Patricia Murphy testified that she is currently employed at the Bucks County Register of Wills as Administrator of the Orphans' Court⁵. She has been working there for approximately four years, and found the job through a posting at Human Resources. Murphy explained that she originally applied for a job with the Clerk of Courts, but was later told that a spot had opened in the Register of Wills for retention copyist, an entry-level position. Murphy testified that Barbara Reilly, Rebecca Kiefer, Candace Quinn, and Sheila Bass interviewed her. They did not ask her what her political affiliation was nor did they tell her during the interview that she would be expected to do political work in the office. Murphy is a registered Republican, and stated that she and her husband had done some volunteering at the polls on elections prior to her joining the Register of Wills. Murphy testified that Kiefer told her that she had to work the polls on Election Day the first May that she began working at the Register of Wills. She recalled that Kiefer said, "It's something that we do here. It's something to help out with the party and we like to give you some comp time." Murphy also stated that she was told to keep any talk of the comp time inside the office, but she was never told not to speak to Reilly or McCullen about it.

Murphy testified that employees were not forced to work the polls on Election Days. Bass would go around with a clipboard and ask each employee how many hours they could work on Election Day, not whether or not they would like to volunteer. Murphy stated that every employee worked the polls and often complained about it, but still signed up to be at the polls when Bass came around with the clipboard. She was not sure how much comp time employees received – whether it was straight time, time-and-a-half, or double-time.

She explained that for the first election, she filled in for a neighbor as Judge of Elections, and thus she was not given any "pink time". Murphy testified that employees that worked as Judges of Elections or committeepersons on Election Days did not receive "pink time" because they had to be at the polls anyway.

Murphy explained that "pink time" is time that employees receive for working the polls on Election Day. She testified that it could also be earned for doing "special jobs" for management, and only supervisors could approve "pink time". Murphy further stated that "pink time" was also known as "election time", "comp time", and "non-reported time." The difference between "pink time" and legitimate comp time which was reported to the Controller's Office was that "nobody was supposed to be told" about "pink time". At various points in her testimony, Murphy stated that actions were taken to hide "pink time" from the Controller's Office.

Murphy testified that she was originally told that the turnover rate for the Register of Wills was very good, and explained that this was one reason she took the job in the first place. When she started working around 2006, she discovered that many employees were leaving and the office atmosphere was uncomfortable. Murphy elaborated, saying that "as soon as management walked in, it was very chaotic,

⁵ Prior to appearing before this Investigating Grand Jury, Murphy attended a meeting with her attorney and members of the prosecution. An agreement was made that Murphy could testify before this Investigating grand jury with Immunity.

big whirlwind would happen and staff was very anxious, intimidated, stressful.” She noted that at that time, McCullen was First Deputy, Kiefer was Second Deputy, and Quinn and Bass were both administrators.

Murphy stated that as employees started to leave the office, she was promoted to probate 2 on the Register of Wills’ side of the office. She then worked in marriage licenses, in adoptions, and in estates, describing it as “a lot of moving around.” Murphy testified that if management had “trouble with somebody, then they were moved, which means you had to move.” She then became Administrator of Orphans’ Court after Bass’s initial retirement.

Murphy testified that even though she performed the day-to-day functions as the Administrator of Orphans’ Court, she was in fact paid as a Register of Wills’ Administrator. She explained that Quinn moved back to the Register of Wills side to be an administrator because she “likes it better” but wanted to keep the pay level of Administrator of Orphans’ Court because it is higher. Thus, Murphy worked as an administrator on the Orphans’ Court side, but was still titled and paid as a Register of Wills’ administrator, while Quinn worked as an administrator on the Register of Wills’ side, but was still titled and paid as the Orphans’ Court administrator. Murphy stated that Reilly is in charge of positions and promotions, and that Quinn was working under the incorrect title.

Murphy also testified that she did not believe she was going to be promoted to an administrator because she believed Colleen Strunk was going to get it. She explained that Strunk often went out to lunch with Kiefer, Quinn, and Reilly, and that she seemed close with them for a while. Strunk was also in charge of payroll at the time. Murphy testified that after she received the promotion, Strunk’s relationship with management seemed to change, around the last week of October 2009. Murphy testified that Strunk was hurt when she did not receive the promotion.

Murphy testified that around the beginning of November 2009, Quinn took her up to the third floor of the courthouse and told her to watch her back around Strunk. Quinn told Murphy that “there’s something up with her” and “she was out to get Becky.” Quinn also asked Murphy to tell her if she saw anything odd going on with Strunk, who at this point was still in charge of payroll.

Murphy testified that Strunk and Quinn both had privileges as department timekeepers to work on payroll, but Quinn preferred for Strunk to do the work. She added that the payroll system, Lawson, was complex enough that a timekeeper had to be trained on it. Strunk kept separate records as well, however.

Murphy testified that Strunk kept an office calendar on Outlook, to which management had access and could view. She noted that Reilly had access to all Outlook calendars in the office. On this calendar, Strunk kept track of every employee’s sick, vacation, legitimate and illegitimate comp time, labeling each one with a name and type of time taken, for example: “P” or “pink” for “pink time”. Murphy noted that “pink time” could never be used for a full day off, because to do so might have alerted the Controller’s Office.

Strunk also kept hard-copy calendars in her desk. Murphy testified that Strunk used a pink highlighter to mark down when employees took “pink time”. She also kept the time off request sheets that employees

submitted, and wrote “pink time” on those for which they were taking advantage of “off-the-books” comp time. Strunk also made copies of the time request forms for the staff, for Quinn, and for Strunk’s own records. Murphy recalled that copies “were just everywhere.”

The fact that Strunk kept so many records with “pink time” written all over them angered Quinn. Murphy testified that Quinn was especially “infuriated” when she saw that Strunk kept track of her comings and goings, such as “Candy in late, Candy went to lunch with this person.” When Quinn discovered it, “she started ripping the pages out and she wanted me to start shredding it immediately.” Murphy testified that she talked Quinn out of shredding it, saying that she should show it to Reilly instead. Murphy stated that after this, Quinn decided to remove Strunk from payroll.

Meanwhile, in January or February 2010, Kiefer asked Murphy to dispose of the Outlook calendar because the IT Department also had access to it and might see it. Murphy testified that because only IT could delete the entire calendar, Kiefer asked her to go through day-by-day and remove the information “as far back as she began it.” Murphy explained that she was the go-to person in the office for computer issues, and that this is probably the reason Kiefer asked her to delete the calendar. She denied changing anyone’s ability to view the calendar, saying that only IT could do that.

Murphy testified that Strunk had kept track of all of 2009 and part of 2008. There was so much data that it took Murphy about three weeks to delete all of it. Kiefer told her to let her know when she reached the most recent month, and at that point Kiefer told Strunk that she would no longer be doing payroll. Murphy recalled that she deleted the last month of the calendar right before Strunk was told.

Murphy further testified that the time off request sheets were taken from Strunk when she was removed from payroll responsibilities. She did not know when the hard copy calendars were removed, but recalled that Quinn did not show them to her until May, several months later.

Murphy testified that she was initially told that Strunk was being moved to two upcoming projects, and that someone else had to take over payroll for a while. She emphasized she believed that “this is where the manipulation started”, and she never thought that Strunk’s duties were being permanently taken away. During the transition, Strunk trained Murphy how to use Lawson, the payroll system, and the coding used for each employee and the number of hours they were present. Strunk told her that Reilly was always marked “RE”, as an elected official, and McCullen was always marked “R” except for the days that he was off site doing probate work. Kiefer was supposed to always receive “straight Rs”, meaning all eight hours per day regardless of whether she was present. Murphy stated that she was trained to do the same thing with Quinn, and to mark her for eight hours whether or not she was present.

Strunk also showed Murphy the “pink book” while training her. Murphy testified that the “pink book” was always kept hidden in Quinn’s locked filing cabinet. She described it as a brown, two-inch binder with pink notebook paper inside. A to Z divider tabs provided each employee’s name, and on each page there was “ink and whiteout and sloppy writing” from adding and subtracting hours. Murphy also testified that Strunk told her to check Lawson for the times that employees used their “pink time.” Employees were always supposed to sign out at their regular time on the time sheets, even when they left early for pink time. If they wrote in the actual time that they left, Murphy was told she would have to white it out and

write in the time they were supposed to leave. She stated that this was done in an effort to keep the information from the Controller's Office.

Over time, Quinn took more responsibilities away from Strunk, causing strife between Quinn and the staff. Murphy recalled that Quinn became less able to control the employees, and had to move people around "more and more." Murphy claimed that her sight of the office was blocked and that she never really knew what was going on during this time.

Murphy stated she believed Quinn took payroll away from Strunk because Quinn thought she was trying to "undermine" Kiefer through the Register of Wills election. Quinn also believed that Knox and Sutherland were "planning some sort of coup" with Strunk.

Murphy testified that while she was in charge of payroll, she felt "uncomfortable" keeping track of everyone's "pink book" time. She explained that she did not like having to falsify time sheets, and knew it was wrong.

Murphy twice testified that she never gave or approved "pink time" as an administrator, and only became involved with it after she was given payroll responsibilities. She stated that it was "a big difference" with payroll because she felt intimidated and that she would lose her job if she did not continue with the "pink book" system. Murphy described the feeling as being "up against a Republican Party," and as if she were stuck with no alternatives, given that "there's no jobs out there. Where the hell we going to go?"

Murphy testified that when she finally became too uncomfortable, she told Quinn that she did not want to have to sign off on incorrect time sheets. Quinn took Murphy into Kiefer's office, saying, "I've been telling Becky that we have got to stop doing this. We're going to get caught." Quinn then told Kiefer that they should stop doing "pink time," to which Kiefer said she was busy and would have to think about it.

Two weeks after the discussion between Quinn, Murphy, and Kiefer, Murphy had to do payroll again, so she again told Quinn that she did not feel comfortable. Murphy testified that this was around March 23, 2010, because she had to have payroll in by March 26th. Quinn took Murphy to see Kiefer again, and told her, "Trish doesn't want to do it", and "you got all this – all these files in the office here. I've been telling you for years to get this shit off your computer."

Kiefer replied that she was too busy, and that she would have to talk to Reilly about employees not working the polls anymore because she knew that employees would not work the polls if they eliminated "pink time"

Murphy testified that a few hours passed before Quinn finally said, "She's not going to do anything about this." Murphy stated she refused to do payroll with "pink time," so Quinn took her into Reilly's office, where the "pink book" was kept. In there, Quinn began flipping through the "pink book", ripping out and shredding the pages of former employees and those who had no "pink time" left. Murphy stated that she was "in shock" while Quinn shredded it. She recalled that Quinn said something like it was an "executive decision." Quinn kept Connie Siracusa, Pat McNeill, and one other's "pink book" pages because they still had at least twenty hours left, and said she would leave those "up to Becky." Murphy emphasized that this must have taken place on March 23, 2010, because it was prior to her putting payroll in on the 26th.

Murphy testified that she was out of work for several weeks following this incident because of illness, and did not return until May 10, 2010. By that point, Peggy Swartz was in charge of payroll and told Murphy not to worry about it. Swartz told her that she did not know what to do about “pink book” time though, and that the staff had been using sticky notes with how much time they wanted off. Murphy recalled being surprised at this, since she thought “pink book” time was over, so she told Swartz not to do anything with it.

Murphy testified that she was positive Reilly knew about “pink time” being given out in the office. She recalled one instance in early 2010 where Reilly, Kiefer, and Quinn were sitting in the break room together. At the time, Groninger was frequently coming in late due to illness and missing a lot of hours. Murphy stated that she walked into the break room and Kiefer told her to give Groninger “pink time” for the doctor appointments that Maryann is going to be using.” That way, even though she would lose an hour or two in pay from signing in late, she would receive an hour or two of pink comp time that she could use at a later date”. Murphy was positive that Reilly said nothing nor asked any questions when “pink time” was mentioned in the break room.

She also recalled an instance where Reilly seemed angry with her for discussing “pink time” over the phone. During one of the conversations between Reilly, Quinn and Murphy following the start of the investigation, Murphy mentioned “pink time”. Reilly replied in the manner of a Dr. Seuss rhyme, something like “pink book, red book, blue fish, white fish”, Murphy recalled. She said that given the tone, she took this to mean, “shut up, and that she had overstepped her bounds.”

Murphy recalled that Quinn shredded a large amount of documents, but was very unclear about the date. She also was not sure when the investigation began or the subpoenas were handed to the office. She believed that it took place before the May election, and could recall the details of the shredding. She testified that Quinn just started grabbing files from payroll records all the way back to 2006 to the present and shredding time sheets. Quinn’s explanation was that she was “housekeeping” and if they wanted to see time sheets, they could go into the computer system and print it out. Even after Murphy offered to check what the county policy was on keeping paper documents, Quinn kept shredding. Murphy testified that the documents Quinn shredded were those that would be needed in case of an audit.

Murphy further testified that during the shredding episode, Quinn began yelling at Kiefer to “get rid of the stuff” in Kiefer’s five-drawer filing cabinet. She explained that Kiefer kept Warrington Township Supervisor materials in her cabinet at work. Quinn gave a box of the Warrington Township materials to Einhorn to shred, as well as a box full of newspaper articles and Township newsletters to Murphy to shred. Murphy stated she never got around to shredding the documents, so Kiefer took the box back and gave it to Einhorn to shred the next day.

Murphy testified that during the two days of shredding, Quinn and Kiefer said that Strunk, Knox, and Sutherland were in a “conspiracy to get Becky in trouble” because they made phone calls trying to report the shredding. Sometime after the shredding, Kiefer asked Murphy to take Warrington files off her computer and save them to disks she had brought in. Murphy stated that she was unable to save them, and told Kiefer to ask Swartz instead. She was unsure of the exact date of this incident, but emphasized that she herself did not ask Swartz to do it “surreptitiously under some false pretense to see who had access” to Strunk’s Outlook calendar.

Murphy also testified that Quinn gave her time off sheets, calendars, and folders to shred. Instead of shredding them, however, Murphy hid them around the office and took them home piece by piece in her bag. Once she had collected all of it at home, she gave the entire box to her attorney, who then turned it over to the District Attorney's Office.

Murphy identified some of the items she turned over. She identified Grand Jury 14, C-12, exhibit number 17 as Quinn's 2008 payroll calendar, on which there was no recording of any "pink time". Murphy also identified exhibit number 18 as Strunk's calendar for 2009 on which "pink time" was marked along with sick and vacation time, as well as exhibit number 20 as time off request sheets with "use 'pink'" and "pink time" written on them. Murphy also identified exhibit number 21 as a document on which she recorded who was working at which poll in May 2010. She explained that employees were still asked to work the polls even though they were not going to be given "pink time" starting with that election. She noted that according to her document, there were not as many employees volunteering as usual. Finally, Murphy identified the book in which Strunk kept track of Quinn's comings and goings.

Murphy testified that not all of the items she hid around the office remained undiscovered. In October 2010, Sheila Bass found some of the time request sheets while she was searching for records required by the subpoena. Murphy stated that when Bass found one with Murphy's name on it, Bass called her into Reilly's office to talk to her, saying, "Look what I found. I'm so happy." Murphy recalled that Bass gave it to her and told her to "get rid of it." Murphy believed that Bass was trying to protect her. Aside from the paper with her name on it, Murphy believed that the rest of the documents that were found were handed over to the District Attorney's Office.

Murphy also testified as to the office environment after the investigation began. She stated that Reilly called the office and told Quinn to take each employee into her office and ask them "what was asked of them so we know what we're up against." Reilly also told Quinn to have a witness in the room when she questioned employees, which in the beginning happened to be Murphy. Murphy testified that Quinn told her about the conversation with Reilly. Though the administration met with several employees about their interviews, Murphy stated that she was never asked about talking to detectives or testifying before the grand jury by anyone.

Murphy recalled one such meeting with Quinn, Einhorn, and herself just before Einhorn was going in for questioning. She described Einhorn as "red-faced" and "worried she was going to have some sort of seizure", saying she looked as though she were going to faint. Murphy stated Quinn played with words, trying to tell Einhorn not to discuss the "pink book".

Murphy also testified that after each meeting with employees who were questioned by investigators, Reilly would call either Quinn or Kiefer on her speakerphone for a "debriefing." It was during one of these meetings that Murphy believed Reilly pretended not to know what "pink book" time was. She asked, "Pink book? Green book? Blue book?" in the manner of a Dr. Seuss rhyme.

Murphy testified that since the grand jury investigation began, Reilly has made comments in the office to the effect of she "gets to face her accuser." She recalled that Eileen Heitz told her that Quinn has also

said to employees that “you don’t F with me, you don’t F with my family, you don’t F with my job. I will hunt you down and I’ll get you.”

Murphy testified that on November 15, 2010, she received an email from the Human Resources Department that Quinn was going to return from FMLA leave. She stated that the staff reaction was so bad, some started to cry, others turned pale, and employees began telling her that they did not want Quinn to come back. After hearing from employees, Murphy stated she went to the Human Resources Department and asked Meredith Dolan not to bring Quinn back. Employees are so scared, she said, that they do not even want to sit near her. Murphy added that courthouse security has been warned about Quinn and that the office locks have been changed because Quinn never handed in her office key.

Murphy testified that Reilly wants to fire Quinn, but will not because it would be “retaliation against her through grand jury, and it could be all kinds of things.” With Quinn out of the office, Murphy stated that Bass is currently acting administrator of the Register of Wills and she herself is administrator of Orphans’ Court. While Reilly calls Bass to check in and comes in at least once a week, Murphy explained that she and McCullen are the ones running the office day-to-day. Murphy believes that McCullen knew about unreported comp time, even though he was not directly involved. She added that he was very much “out of the loop” for several years, and has only just started to become a productive member of the office. McCullen told her recently that he is “staying low” for now.

Murphy testified that she felt used and manipulated by management. When she saved documents from shredding, she did so because “my job in that office is to protect documents”, and it “didn’t feel right to shred” them. Murphy strongly emphasized that she did not see herself as part of a clique with Quinn, Reilly, Bass, and Kiefer, and that she only wanted to do the right thing.

Murphy testified that in June of 2010, fellow Register of Wills employee Sheila Bass handed her a binder that contained personnel policy and procedures. The binder was identified as Grand Jury 14, C-12, exhibit number 24. Murphy testified that within that binder, she found a memo dated May 24, 2002, regarding comp time for working at election polls. She testified that the memo explained that people in the Register of Wills Office were receiving comp time for working the polls. She acknowledged that there was a distinction made between legitimate comp time and “off-the-books” comp time. She indicated that she had not discussed this with Bass. The memo was identified as Grand Jury 14, C-12, exhibit number 22 (Attached herein as “Exhibit C” and incorporated hereto).

Murphy explained that Kiefer had approached her in August 2010, and had asked Murphy to print out Kiefer’s history of absences. Murphy said that Kiefer told her it was for her case, this case, and that the copies were for herself and for her attorney. Murphy acknowledged that she printed out Kiefer’s history of absences and gave the copies to Kiefer. Murphy also acknowledged that she was familiar with Outlook calendar printouts that depicted the amount of time worked for each staff member. She testified that Quinn handed her these calendars to shred.

Murphy also acknowledged that she had taken notes on a yellow tablet about staff members that met with investigator David Rouland. She testified that on this tablet, she wrote each staff member’s name and the date that each staff member met with Rouland. She also explained that on this tablet, she had made markings on the names and that the markings had meanings. She explained that if the names on

the tablet were highlighted in orange, then that meant that she and Quinn had met with the staff member after the staff member met with Rouland. She explained that if there was an "X" next to the name, then that meant that the staff member had a union representative with them. Murphy's notes were identified as Grand Jury 14, C-12, exhibit number 39.

Murphy testified that when she and Quinn met with the staff members, she took notes and Quinn asked the questions. She testified that there were notes taken on the interviews of five different staff members. She indicated that the first name on the tablet was Einhorn and she read her notes to this grand jury. She testified that her notes said that Quinn asked Einhorn "what was asked of you," and that Einhorn replied, "did I ever --have you ever seen a "pink book'?" and Einhorn said, "No." Murphy testified that her notes said that Einhorn was asked about the cash box and her notes indicate that she said, "taken in by title searchers for copies, wait for receipt, they usually say no. Replacing cash box. End of month deposit. Third question, hold mandatory. Fourth question, shredding. Dottie said two weeks ago. Question, was it political, was she involved? Dottie said don't know. We were house cleaning."

Murphy acknowledged that the other staff members listed with notes were Sue Toal, Connie Siracusa, Pat McNeil, and Yolanda Benscoter. Murphy said that Toal and Siracusa were together when Quinn asked them questions. Murphy admitted that the notes underneath Pat McNeill's name said "pink book," "Election Day forced to work," "shred all time sheets," "comp time on pay checks?" Murphy explained that the note below Pat McNeil's name referred to McNeil's confusion about the comp time being on the paycheck or the "pink book", and not about whether they should shred anything.

Murphy testified that prior to interviewing these employees and making these notes, Quinn wanted to interview Donna Hampshire after she had met with Rouland. Murphy explained that when Hampshire appeared upset after her interview with Rouland and refused to talk to Quinn, Quinn told Murphy that she called Reilly and Reilly said that they needed to find out what they are asking. Murphy testified that they would go to people who would be willing to speak and not to people who would be "stiff. about it. Murphy also explained that the "X" next to names on the chart revealed that that person had a union representative in the meeting with them. She testified that Reilly worried that they should not be alone in the meeting and that the reason for the "X's" next to the names was because Reilly would want to know who had a union representative with them.

Murphy explained that if the names on the yellow tablet were not highlighted, then that meant that she and Quinn had not spoken to them after their interviews with Rouland. She read aloud the names on the list and acknowledged that these names were on the list because they had been interviewed by Rouland. She explained that an orange circle around a name indicated that that person was never spoken to by Rouland. She testified that if next to the name it said "called," then it meant that Rouland had called the office seeking to speak with that person.

Murphy testified that Quinn gave her a stack of papers to shred. She said that the papers that she was given to shred were screen printouts. She explained that screen printouts are basically a snapshot of what the computer screen depicts at the time that the screen is printed. She identified one of the screen printouts she was given as coming from Kiefer's computer. She said that she believed that Quinn had printed this screen. Murphy revealed that she found these screen printouts contained on computer disks. She testified that she found these disks when she was cleaning a locked filing cabinet drawer in Reilly's

office. She said that one of the disks contained the date of May 28, 2010. She explained that on May 28, 2010, she knew that Kiefer was not in the office as Murphy was called to the Friendly's parking lot to pick up members of the office because Kiefer's car had broken down when they were out. Murphy testified that she opened one of the disks labeled "BGR files". She said that this disk contained Reilly's political files.

Murphy also testified to a number of calendars that were given to her by Quinn to shred. She recognized one of the documents that Quinn gave her to shred as everybody's old payroll documents. These documents were identified as Grand Jury 14, C-12, exhibit number 54. Murphy testified about a stack of papers which she found in the office. She recognized these documents as an access database that had been made up identifying attorneys who should be solicited for Reilly's 2007 fundraiser. Murphy testified to another document that was titled, "comments and responses for subpoena dated July 7, 2010." She explained that she got this document from Kiefer. It was identified as Grand Jury 14, C-12, exhibit number 55. She testified that when they received subpoenas from the Controller's Office, there were ten questions on it and Kiefer put down her answers to the questions. She acknowledged that at that time, Reilly, Quinn, Kiefer, and herself were supposed to hire one attorney to represent them all. She explained that Kiefer wanted to share her answers to the subpoena questions with her and that Kiefer remarked that she wanted them all to be on the same page.

Murphy testified to Kiefer's answers to the subpoena questions. She acknowledged that Kiefer wrote in one of her answers to the subpoena questions that she has never given any compensatory time outside of the county payroll system. She testified that to her knowledge Kiefer has given "pink book" time. She acknowledged that in another answer, Kiefer wrote that employees were not required to participate in political activity. Murphy admitted that she did not think that this answer was true. She explained that employees were asked to work the polls and that they did not feel that they had a choice. She also acknowledged that Kiefer answered that nobody was treated better or worse for working the polls. Murphy explained that she knew that the staff felt like they were being treated differently. Murphy identified Grand Jury 14, C-12, exhibit number 56, a file with the name Shawn Rose on it. She explained that she received this file from Quinn as one of the documents to shred. She testified that on the front of the file, with Rose's name, it says "start date 8/21/09." She testified that inside of the file there was a piece of paper that said, "Shawn Rose, pink book, 8/18, Tuesday, 8:15-3:00; 8/19, Wednesday, 8:15-4:30; 8/20, Thursday, time 8:15 to 4:30 PM" She identified this handwriting to be that of Strunk. She explained that Rose worked from August 18th to August 20th. She admitted that the dates on the inside of the file reveal that he was getting "pink book" time before his official start date of August 21st. She explained that Quinn told her that they would just keep August 21st as his start date in Lawson and give Rose "pink book" time so that he could use that time when his baby was born.

Murphy admitted knowing about the "change box". She testified that she knew that Einhorn would roll quarters from the box and deposit them. She said she was not aware that a great deal of the money was put into a drawer in Quinn's desk, and she was not aware that people from the office took coins from the box for lunch. She testified that she knew that they ring everything up now and there is no "change box" anymore. She said that she had not heard that the amount of money in the cash register has increased dramatically since the end of the "change box."

Murphy testified that she was promoted in November 2010 to Second Deputy.

Testimony of James McCullen

James McCullen is currently employed at the Bucks County Register of Wills as Chief Deputy Register of Wills, also known as First Deputy Register of Wills, and has been employed in this position for 22 years. McCullen testified that in the hierarchy of the Register of Wills, his position is directly below that of the elected Register of Wills, Barbara Reilly. McCullen admitted that in his position as First Deputy, he works in both the Orphans' Court and the Register of Wills sides of the Register of Wills Office. He also testified that in his position as First Deputy, he approves the probate of estates and acts as the officer for will contests. McCullen acknowledged that as First Deputy, he acts as the Register of Wills when the Register of Wills is absent and that his position is mostly "day-to-day operations." McCullen described that the "day-to-day operations" of his position were mostly as a supervisor in that he trained "the girls" in the office and approved probate decisions.

McCullen testified that he was hired as First Deputy Register of Wills in 1988 after he interviewed with Register of Wills Barbara Reilly. McCullen explained that before he interviewed, he initially found out about the job through the Chairman of the Bucks County Republican Committee. McCullen indicated that it was the Chairman who made sure that McCullen was informed of the job opening and that upon application he was hired. McCullen acknowledged that he is a life-long Republican. He testified that he has been involved politically for most of his life. He explained that prior to getting his job in the Register of Wills, he was an elected Councilman for Bristol Township in 1985. He testified that his position as Councilman of Bristol Township lasted four years.

McCullen admitted that he continued to be politically active when he became the First Deputy Register of Wills in 1988. He acknowledged that since 1988, he has been involved in "a lot of political things" and has worked on "a lot of the campaigns." He testified that he ran for Mayor of Bristol Township a year prior to testifying before this grand jury. He said that he is currently on the Republican State Committee representing Bucks County and that this is an elected Republican position. McCullen indicated that he did not run his campaigns out of the Register of Wills Office. He said that he took an ethics class at a Register of Wills conference and brought back an outline from that class to make sure that when he was running that "we didn't cross that line." He admitted that Reilly, Kiefer, and Quinn also went to the same conference, but testified that they did not attend the ethics seminar.

McCullen testified that he spent many lunchtime hours at the Bucks County Republican Headquarters, which is located across the street from the courthouse. He said that he would sometimes bring petitions from the Republican Headquarters for members of the Register of Wills staff to sign and that the petitions were signed during office hours. McCullen acknowledged that he was aware that Register of Wills employees were being asked to put up and take down signs, knock on doors, and go to train stations doing political things during office hours. McCullen testified that he did not tell the employees to do these political things, and that Kiefer might have told them to do these political things. McCullen acknowledged that he "lost control of some of that part of the office." He testified that Kiefer's intention was to be the next Register of Wills and that she was actively running for that position over the past four to five years. He said that Reilly was "trying to push her (Kiefer) as the Register of Wills" and "kind of gave her (Kiefer) the run of the office." McCullen explained that he worked at the pleasure of Reilly and he knew that Reilly was backing Kiefer.

McCullen testified that he brought Quinn into the Register of Wills Office approximately fifteen to eighteen years ago. He explained that Quinn was a friend of his and that they worked on campaigns together. He testified that he was very close friends with Quinn when she first came into the office, but that that changed around the same time when she (Quinn) began to push Kiefer into the position of the next Register of Wills. McCullen indicated that Kiefer made it plain that she wanted to be the next Register of Wills. He acknowledged that the Register of Wills was a very political office when he started there and that there were members of the office working the polls back in 1988. McCullen admitted that it was an "unspoken requirement" of the members of the office to work the polls. He testified that Strunk told him about a conversation between Einhorn and Quinn just before Election Day in which Einhorn told Quinn that she could not work the polls and Quinn said that it was not a request and that she needed to "make it happen." McCullen indicated that he believed Strunk would tell him the truth.

McCullen testified that he was familiar with poll worker lists from the Republican Headquarters. When McCullen was showed a poll worker list, he acknowledged that several of his employees' names were on that list, including the names of Kiefer, Heitz, and Quinn. He acknowledged that next to the names of the list, there were numbers and that those numbers appeared to correspond to the amount of hours that Kiefer, Heitz, and Quinn worked the polls. McCullen admitted that he had never seen this list, but that it would not surprise him if the list came from the Register of Wills Office. McCullen testified that he knew that people in his office worked the polls. He acknowledged that some of the people in his office worked the polls, although they did not want to work the polls, because they were told to work the polls. He testified that he knew that Election Day is a paid county holiday. McCullen admitted that he knew that some people were being forced to work the polls. McCullen testified that he did not know that people were getting comp time for working the polls. He also testified that he did not know that people in his office were getting "'off-the-books' comp time."

McCullen admitted that if the Register of Wills Office were audited, a report would be generated after the audit and it would be his duty to read it and follow the recommendations in the report. McCullen acknowledged that he would have read the 1998 audit report, Grand Jury 14, C-12, exhibit number 23, that revealed that there was unreported comp time being given to members of the Register of Wills Office with no explanation of why it was given. McCullen indicated that he did not remember reading exhibit number 23. He testified that he knew that audits do not happen all the time and that audits are important, but that he did not remember reading this report. He also acknowledged that he did not remember reading Grand Jury 14, C-12, exhibit number 22 (See "Exhibit C"), a Register of Wills memo from Alyce Luce and Sandy Pappert, addressed to all employees, dated May 24, 2002 that explained that comp time is not allowable by the county for working Election Day, but that they are keeping Election Day comp time by itself and that when employees used comp time, they would be using any election time first. McCullen explained that if he read this memo, he would have initialed it and passed it on, but that he did not initial this memo. He testified that until this investigation he was unaware of people in his office getting comp time for working the polls.

McCullen admitted that it was "absolutely wrong" for people to work the polls and get comp time for it, and that this amounted to stealing from the county. McCullen testified that "pretty much everybody" in the Register of Wills Office worked the polls on their days off. He testified that if Reilly were running, he believed that they all should have worked the polls and that the incentive for working the polls was their

job. McCullen was unable to name anyone who was employed by the Register of Wills who did not work the polls from 1988 to the present.

McCullen testified that he has never heard of the "pink book". He admitted that he first heard about a book or binder where comp time was kept for each member of the office, but not recorded for the Controller's Office, about four months prior to his testimony before this Grand Jury. He acknowledged that he is now aware that several documents were shredded in the Register of Wills Office and that he found out about the shredding through "the girls" in the office who saw Quinn shredding. McCullen indicated that he knew of a calendar kept on the computer for vacation and time-off requests. He testified that he did not know how to do payroll. He said that he would sometimes approve employees' time off requests, but that he had never heard of "pink book" time off. He testified that as far as he knew those who received comp time, were receiving legitimate comp time. He also testified that he never checked to see if the employees had comp time to use, but would assume that they had it if they asked to use it.

McCullen admitted that he had access to a calendar on his computer that indicated which employees were working on which days, but that most of the time he did not check it. He acknowledged that in the last couple of years, Reilly has not been at the office very often and that that would put him in charge as First Deputy. He admitted that Kiefer had more power and more say about where employees were placed than he did.

McCullen testified that there was a charity jar kept at the Register of Wills for a homeless shelter. He said that the money was collected yearly for the past ten years, but that the jar's top had to be glued shut because someone said that Kiefer took money from it. McCullen also testified that he was aware of a "change box" kept at the Register of Wills that was used when people did not want a receipt for copies or left money on the counter. He testified that he did not know if the money from that "change box" was dumped into Quinn's desk. He said that he is aware that totals of the cash register are done every month. McCullen acknowledged that he knew that the Register of Wills was no longer using the "change box". McCullen also acknowledged that since the "change box" is not in use, the amount of money that is being deposited by the Register of Wills from their cash register has increased substantially. He said that the number of copies have not increased compared to other years. McCullen testified that he did not know that people were taking money from the "change box" for lunches and drinks. He said that if he knew, he would have said something because approximately two years ago when money went missing from the "change box", he confronted his staff about it and it stopped. McCullen acknowledged that if people were using the money from the "change box", then they would be stealing from the county and from the taxpayers. He testified that if he knew about what was going on with the "change box", he would have reported it. He testified that he also did not know that an employee, Shawn Rose, received "pink book" time for working on his mayoral campaign.

McCullen explained that he did not confront Quinn about shredding documents and he did not report this to Reilly or anyone else when he found out about it. He testified that since he found out about the shredding, he did not talk to Reilly, Kiefer, or Quinn about it. He acknowledged that Reilly did ask him who he thought had started the investigation and that she may have asked him what he was going to say in front of this grand jury. He testified that Reilly also asked him if he knew about the "pink book" and then told him that she did not know about the "pink book". He acknowledged that Strunk is one of his confidants in the office and that she told him about the "pink book" approximately four months before he

testified before this grand jury. He indicated that he was not sure if he believed that Reilly did not know about the “pink book.” He testified that Reilly kept in contact with Kiefer regularly.

Testimony of Rebecca Kiefer

Rebecca Kiefer testified that until August 2010 she was employed in the Register of Wills office in Bucks County as Second Deputy. She stated that she was hired as a marriage clerk in 1985 after her aunt asked Barbara Reilly to interview her. Kiefer worked as a marriage clerk, then a probate clerk, and an administrative assistant to Reilly for several years before becoming a supervisor.

Kiefer testified that as an administrative assistant to Reilly, she took care of secretarial work such as arranging appointments, phone calls, and speaking engagements. After a few years, “they changed the title” to that of a supervisory position in order to promote her as an administrator. In her capacity as administrator, Kiefer testified that she was responsible for brochures and keeping track of legislation that affected the office. She held this position for five years before being appointed Second Deputy, following Sandy Pappert’s retirement.

Kiefer testified that at the time she became the Second Deputy, Quinn was administrator. Luce and Bass were also administrators “at some point.” Previous deputies included: Tillie Winton, Chuck Roudenbush, and Pappert, but Kiefer could not recall the exact dates each held their respective positions. She could not recall when McCullen started as a deputy.

When asked what her duties were as Second Deputy, Kiefer testified, “I love public service” and added that she was in charge of scheduling public service programs, including brochures and exhibits. Kiefer also stated she was on a District Attorney task force for the elderly and again said that her job was “mainly public service.”

Kiefer testified that Reilly was not in the office on a daily basis, but stated that she spoke with Reilly every day. She emphasized that she “would not do anything without first consulting” Reilly. When asked if she ran the day-to-day operations of the office, Kiefer stated that McCullen was present as well, but she did not know whether he spoke with Reilly every day. Kiefer conceded that Reilly liked her to call instead of McCullen. Kiefer conceded that if an issue ever came up in the office, it was common for her to call Reilly about it. She further testified that McCullen did override her on occasion and came into the office daily, though not for eight hours every day. Kiefer said that McCullen spent much of his time at Republican Headquarters, but added that she could not see his office from her desk so she was not sure how often he was present. She was not sure if Reilly ever gave McCullen directives that she was not aware of.

Kiefer testified that Reilly was consulted for “every decision that I ever made” but said she did not know if she herself contributed to those decisions. She stated she brought Quinn or Murphy into conversations with Reilly on a regular basis as well. McCullen was part of meetings sometimes, but he mostly spoke with Reilly separately. Kiefer witnessed employees going to McCullen with questions, and going to Quinn’s office on a regular basis. Kiefer stated she usually answered employees’ questions regarding their jobs, and not day-to-day office problems.

Kiefer testified that the office collects money from consumers for various services, including marriage licenses and copies. Copies cost twenty-five cents for customers to make them themselves, and one dollar for staff to do it for them. Kiefer explained that the money for copies went into the cash register under an account code, but admitted that it's "pretty much an honor system" and customers often left change on the counter.

Kiefer then admitted that there was a "change box" under the counter near the cash register in which employees put some change from copier fees. She testified it was kept for employees to make change, and that the money was not immediately put into the cash register. Kiefer denied putting the box away during audits. She testified that Einhorn deposited the money, but did not know how often. Kiefer stated she would be surprised if Einhorn only deposited some of the change, but then admitted that she had heard some money was placed into Quinn's desk, but did not know it for a fact. She also denied ever knowing Reilly to authorize Quinn to keep a petty cash fund from the "change box" proceeds.

Kiefer testified she never saw anyone take money out of the "change box" for drinks or lunches, and denied that she herself ever took money from it. Kiefer emphasized that she made change from the box on numerous occasions, but never took money. She also added that there were only ever "two or three" dollar bills in the cash register.

Kiefer testified that on one occasion, she asked Comcast to fix her computer connection from her home to the courthouse. Around 3:30 PM or 4:00 PM the day of the appointment, Reilly asked her to stay and work on an interview she was having later. Kiefer stated she asked Quinn to call the Comcast technician and tell them to cancel, and a little while later Quinn told her not to worry about it because it was taken care of. Kiefer emphasized it was her understanding that an employee who lived close to her offered to meet the Comcast technician at Kiefer's house after work. Kiefer identified Grand Jury 14, C-12, exhibit number 65 as a work order from Comcast at her address. She recognized the name on the signature line as Siracusa, but added that she was not sure if it was Siracusa's signature. Kiefer also noted that the time stamp on the work order was for 3:45 PM on September 28, 2009.

Kiefer testified she could not recall ever asking employees to run errands for her during work time, whether for dry cleaning, groceries, or anything else of that nature. She agreed that it would be inappropriate to ask employees to do those things while being paid on county time.

Kiefer testified that she has been close with Reilly for many years, and stated Reilly is a very politically active woman. Kiefer added that Reilly is also involved with politics aside from her own position as Register of Wills and feels very strongly about the Republican party in Bucks County. She also added that it was known to the staff in the office how Reilly felt about politics.

Kiefer testified she is a registered Republican and was "not at all" politically active before joining the office. She could not recall the first time she worked the polls on Election Day, but had not done so before joining the Register of Wills in 1985. She could not recall the exact year she began working in politics, but noted that she volunteered to be a committeeperson in Warrington after Reilly asked her to do so. Kiefer was an unpaid committeeperson for twenty years before becoming a Warrington Township Supervisor. She described a township Supervisor as someone "who regardless of their political lane

believes in public service.” Kiefer added that she was only paid \$3200 per year and was a Supervisor primarily because she loved her township and wanted to “give something back.”

Kiefer testified she was also on a zoning board for approximately ten years prior to becoming a Supervisor. She denied that Reilly asked her to be on the zoning board, and described it as an “apolitical” position. She did concede that township Supervisor is political and that Reilly encouraged her to run for the position. Kiefer also stated that Reilly encouraged her to be a committeeperson because she would have a vote in the Bucks County Republican Committee about endorsements. Kiefer noted that Reilly’s position as Register of Wills is an elected position and Reilly would want to be endorsed by the Republican Party.

Kiefer testified that at one point she started to have aspirations to be the next Register of Wills if Reilly ever decided not to seek re-election. Kiefer indicated that Reilly supported the idea of Kiefer becoming the next Register of Wills. She has since resigned from her job at the Register of Wills as well as her township Supervisor position. Kiefer stated she resigned from the Register of Wills in August 2010. Kiefer emphasized her resignations were due to health reasons and had nothing to do with the grand jury investigation.

Kiefer testified there was an issue regarding her giving two weeks’ notice being given before her resignation. She explained that she told Reilly in the beginning of July 2010 that she was too sick and would have to resign, and recalled that Reilly asked her to “hold on a little longer.” Kiefer agreed, but then two days later decided she was on too much medication to continue working, so she wrote Reilly an official notice of her resignation. After some clarification with the county and a request from Reilly, the county agreed to give Kiefer her unspent sick and vacation time so that she could resign. When asked if she backdated her resignation letter, Kiefer invoked her Fifth Amendment right against self-incrimination.

When asked whether she was concerned about the grand jury investigation, Kiefer invoked her Fifth Amendment right against self-incrimination. She then testified, “the investigation was causing some additional stress.”

Kiefer testified that as a county employee, she was paid on certain holidays throughout the year, including Labor Day, Christmas, Primary Election Day and Election Day. She stated that as a supervisor, she had no power to force a staff member to work on one of those holidays. Kiefer did not know if Reilly was able to force employees to work, or what the county policy about working on paid holidays was.

Kiefer testified that she never forced anyone at the Register of Wills to work the polls on Election Days. She stated that she never asked any employees to work the polls, and finally stated that she never heard anyone ask someone to work the polls. Kiefer then admitted that she asked staff if they were working at all on Election Day so she could send that information to Republican Headquarters. That way, headquarters would know whether the polls were covered for every election. Kiefer explained Reilly asked her to inquire where and if “certain people” were working the polls.

Kiefer testified that employees did sometimes tell her that they were not working the polls, and sometimes they gave reasons. She recalled that Pat McNeil could not work the polls once, and Eileen once said she could not. Kiefer conceded that it was more uncommon for someone not to work the polls

on Election Day than it was for an employee to work the polls. She added however that “most of the people that were hired, were involved in politics before they came”, so many worked at polls. When asked whether Register of Wills employees were given “off-the-books” comp time for working at the polls, Kiefer invoked her Fifth Amendment right against self-incrimination.

Kiefer invoked her Fifth Amendment right against self-incrimination when asked whether she has ever heard the term “pink book” and when she was asked if she knew that the “pink book” was a way to get employees to work the polls for Reilly.

Kiefer did not recall an office audit in 1998, but believed one may have happened that year. She did recall an audit report that was issued by the Controller’s Office after it was performed in 1998. Kiefer testified all she could recall was that Reilly explained what it was and she may have typed Reilly’s response to it, as she was Reilly’s secretary at the time. Kiefer denied knowing about the Controller’s Office addressing discrepancies in the audit. Kiefer identified Grand Jury 14, C-12, exhibit number 23 as an audit report prepared in 1998 by then-Controller Rea Boylan Thomas that she had seen before.

Kiefer conceded that the Controller was concerned in 1998 about comp time given in the Register of Wills that was recorded with no explanation of why it was given. She testified that the county informed the office that was against policy. She stated she was present during the meeting where the audit was explained to Reilly by the Controller’s Office, but could not recall everyone who was present. After looking at the last page of the audit report, Kiefer noted that she, McCullen, Pappert, and Reilly were present when the findings were explained, but emphasized she did not independently recall being there.

Kiefer did recall the Controller’s Office doing another audit of the office in 2002. She testified she was unaware that the audit went unfinished and that she did not receive a report on it. Kiefer was not aware of the issue of unreported comp time being brought to Reilly’s attention at that time.

When asked if she was aware of illegitimate comp time being given to employees for the 25 years Kiefer was employed with the Register of Wills, she invoked her Fifth Amendment right against self-incrimination.

Kiefer testified that as administrative assistant and administrator she composed memos from Reilly to employees in the office, partly because McCullen could not type well. She stated that it was commonplace as both administrator and then when she was Second Deputy for her to send memos to employees. Kiefer denied ever seeing a memo to employees regarding being paid to work on elections days written by Luce and Pappert, labeled Grand Jury 14, C-12, exhibit number 22 (See “Exhibit C”). Kiefer first denied ever knowing if employees were paid comp time for working election days. Then when asked directly if she had any idea that staff were being paid comp time, Kiefer invoked her Fifth Amendment right against self-incrimination. She conceded that given the memo from Luce and Pappert, it appears it was happening.

Kiefer testified she never handled payroll or time sheets. She then stated that if staff wanted to take vacation or legitimate comp time she had to sign off on it. Kiefer denied that anyone she approved ever asked for “pink time,” and said, “that expression has come up just this year as part of this investigation.”

When asked if anyone she approved requested unreported comp time, Kiefer invoked her Fifth Amendment right against self-incrimination.

Kiefer testified that around 2006, perhaps earlier, Quinn devised a form to keep track of absent requests. She conceded that she approved the forms that requested time off for vacation and holidays. Kiefer emphasized she did not always know the details of the requests, even though she was Second Deputy when she made those approvals.

Kiefer invoked her Fifth Amendment right against self-incrimination when asked if it was her signature on the bottom of Grand Jury 14, C-12, exhibits number 63 and number 64, which were time off request slips with her signature appearing on the bottom. She noted that exhibit number 64 (Attached herein as "Exhibit E" and incorporated hereto) had "pink comp" written on it, and exhibit number 63 (Attached herein as "Exhibit D" and incorporated hereto) had "balance of unreported comp" on it, dated from March of 2006.

Kiefer invoked her Fifth Amendment right against self-incrimination when asked if she recalled a conversation with Quinn regarding destruction of the "pink book", if she recalled telling Quinn that nobody would work the polls if the "pink book" was destroyed, and if she recalled telling Quinn and Murphy that she would have to talk to Reilly before destroying the "pink book".

She invoked her Fifth Amendment right against self-incrimination when asked if she was aware employees were doing political work in the office while she was the Second Deputy.

When asked if she was aware that Quinn had destroyed documents in May 2010, Kiefer invoked her Fifth Amendment right against self-incrimination. She also invoked her Fifth Amendment right against self-incrimination when asked if she was aware that payroll documentation had been destroyed. Kiefer then testified that she was not aware of any official policy regarding shredding of office documents. She explained that Quinn cleaned out file cabinets on a regular basis by shredding documents. She could not recall whether anyone in management sent out a memo about not destroying or removing documents once the investigation began.

She also invoked her Fifth Amendment right against self-incrimination when asked whether she did any township work on county time and if she had any papers or documents for Warrington Township in the courthouse.

Kiefer described her office management style as sociable, and noted that she suggested luncheons and parties to "lighten it up a little" in the office. She stated her management style was loose and she trusted employees. Kiefer also admitted she was lax when it came to employees coming and leaving the office. She also noted that she yelled at employees on occasion, but "not often." Kiefer testified that she tried "very hard" not to berate employees in front of customers. She could not recall Quinn berating employees in public, but had heard a complaint from an employee. Kiefer denied any knowledge of a "bad girl chair" and emphasized that Quinn characterized employees' seats as having to do with their responsibilities. She added that Quinn's management style was "knee-jerk."

Kiefer testified while she was out sick frequently in 2009 and 2010, Quinn and McCullen primarily ran the office. She explained that during that time, she often came in for a few hours just to sign documents and then would go home.

Kiefer testified she instituted an annual employee review system, but added that it was not done on a regular basis. Prior to the investigation, she would have rated Quinn and Murphy as good managers. Kiefer stated she considers Murphy honest, but is not sure about Quinn's trustworthiness.

Kiefer testified that the office mood prior to the investigation was good, and that employees had a luncheon party once a month. She added, "we often would go out together, you know."

Kiefer also testified the Register of Wills is so political because Reilly hired people that "came to her from political connections."

Kiefer testified that Grand Jury 14, C-12, exhibit number 66 was a document entitled "Rebecca Ann Kiefer, Comments and Response for Subpoena", and it was dated July 7, 2010. She described it as a confidential note she typed up for her attorney and gave to him. She added that it was never meant for the Controller's Office, though it did describe much of McCullen's duties in the office.

Testimony of Detective Gregory Langston

Gregory Langston testified that he has been employed as a detective in the Bucks County District Attorney's Office since 2006. Prior to working for the District Attorney's Office, he worked in law enforcement for over thirty years. Langston stated he worked for the Pennsylvania State Police in their criminal investigations and organized crime units, has been detailed to the FBI for political, prison, and police corruption, and began working as a county detective after his retirement in 2005.

Langston testified that he has not spoken to any former or current employee in the Register of Wills who did not know anything about unreported comp time, so it is difficult to know when it started. Langston then added that McCullen denied knowing about unreported comp time.

Langston testified he has been involved in the grand jury investigation for approximately six months at the time of his testimony, investigating "off-the-books" comp time given to employees in the Register of Wills office. He explained it has been difficult to find information on the comp time because so much of it has been from employees' personal recollections, with very few dates. Murphy, who came forward with documents that can be verified through the Controller's Office, has contributed immensely to his investigation, he stated.

Langston testified it is important to track the comp time exactly because it is needed for grading the crime and determining whether a felony or misdemeanor has been committed. Langston stated it will be "virtually impossible" to track down every comp hour that was ever used, because so few people recall precise details. Even where comp hours are recorded as given, it is important to note that the crime is in using the comp hours, not in giving them.

Langston explained that he put together a spreadsheet with Investigator Rouland tracking "pink book" time for fifteen employees, labeled Grand Jury 14, C-12, exhibit number 62. He emphasized that these

employees were not the only people who took “pink book” time. They were just those that could be verified through the documents gathered by Murphy and the grand jury subpoena. These documents included calendar books from 2008 to 2010 and a number of absent request forms. He described each of the columns in the spreadsheet: name, date, time taken, county pay, manager’s approval, and comments. The “manager’s approval” column was where Langston recorded who signed off on the absence request.

Langston explained he went through payroll records from December 2005 onward looking at any vacation time that looked suspicious, and then checked those dates with Rouland in the Controller’s Office to see if the employee was paid for that day. He stated that he could not look at every day for every employee because of the sheer amount of time the comp time had been given, believed to be 30 years. Using this method, Langston testified he determined that for the fifteen employees whose records could be verified, there was \$6,146.60 lost in county pay for the hours the employees took unreported comp time. He emphasized that this is a very rough figure, and a bare minimum amount, given the lack of documents.

Langston testified that the amount needed to charge a theft as a felony in Pennsylvania is \$2,000.

On February 24, 2011, Langston appeared again before the grand jury. He identified Grand Jury 14, C-12, exhibit number 68 (Attached herein as “Exhibit F” and incorporated hereto). He explained that exhibit number 68 was meant to replace exhibit number 62 because it contained updated information for the spreadsheet.

Testimony of Candace Quinn

Candace Quinn testified that she previously testified before the grand jury in July 2010 with “use immunity”, but that she no longer has immunity. Quinn stated she has been employed at the Register of Wills for approximately eighteen years⁶. When asked if James McCullen helped get her the job, she invoked her Fifth Amendment right against self-incrimination. Quinn testified that she is currently on suspension from the Register of Wills and is not being paid. Her last position in the office was as an administrator, below the First and Second Deputy and Barbara Reilly. She has been an administrator for five years. Quinn stated that Murphy is the second administrator who is her supervisory equal, even though Quinn admitted that she herself is paid more. When asked whether part of her job duties were to run the daily operations of the office, Quinn invoked her Fifth Amendment right against self-incrimination. Quinn stated if she had a question, she went to Kiefer. Quinn testified that Kiefer and McCullen were her supervisors in addition to Reilly, who is the Register of Wills. She stated that even though Reilly was not always in the office, she called in on a daily basis to speak to Kiefer, and occasionally Quinn herself. When asked if Reilly was aware of the day to day operations of the office, Quinn invoked her Fifth Amendment right against self-incrimination.

⁶ Quinn originally appeared before this Investigating Grand Jury on July 29, 2010. She provided testimony pursuant to an Immunity agreement with the Commonwealth wherein said testimony could not be used against her. Therefore, her original testimony of July 29, 2010 is not included in this summary and was not considered by this investigating grand jury when contemplating this Presentment. The above summary is from testimony given by Quinn with no such agreement.

Quinn testified that she is a county employee and receives several paid holidays per year, including Election Day and Primary Election Days. The courthouse and the Register of Wills are closed on those days and Quinn added that she cannot be forced to work on paid holidays.

Quinn invoked her Fifth Amendment right against self-incrimination when asked if she is politically active, but did testify that she has been registered Republican her entire life. She also stated she has held political positions. Quinn added that Reilly is also a Republican, as is every employee at the Register of Wills. Quinn admitted that in her eighteen years in the office, there has never been a Democrat working there. She explained that Reilly and Kiefer directed her to look up voter registration before hiring, but that she never asked potential hires about their affiliation during an interview.

Quinn testified that employees have a lot of interaction with the general public, including collection of money for various services. Some of these services include copies of marriage licenses, genealogy searches, research, and use of the copier. Quinn explained that copier fees are normally twenty five cents or a dollar if an employee makes the copies. She stated there is a cash register to collect money, but when asked if money is sometimes put somewhere else, she invoked her Fifth Amendment right against self-incrimination.

Quinn conceded she has seen customers leave money on the counter, but invoked her Fifth Amendment right against self-incrimination when asked if she ever saw money placed into a coin box or knew what the "change box" was. She also invoked her Fifth Amendment right against self-incrimination when asked what happens to the money in the cash register at the end of the day and what the procedure for depositing the money is. Quinn invoked her Fifth Amendment right against self-incrimination when asked if she ever placed that money into her desk and whether it was ever deposited with the Controller's Office. Quinn did testify that the procedure was created by Reilly and Kiefer and added that she believed the procedure came through auditors. When asked if she saw Kiefer take money from the "change box", Quinn invoked her Fifth Amendment right against self-incrimination.

Quinn testified that McCullen was present when policies and procedures were set, and stated that she consulted with McCullen, Kiefer and Reilly about policies. She emphasized, however, that she did not set any. Quinn also stated that McCullen knew about the goings-on in the office and kept his office door open.

Quinn invoked her Fifth Amendment right against self-incrimination when asked if there were legitimate reasons for employees to receive comp time, if staff were expected to work at the polls on Election Day, and if Reilly directed staff to work on Election Days. Quinn also invoked her Fifth Amendment right against self-incrimination when asked if she was aware of the "pink book," that the "pink book" was a way to track illegal comp time for working the polls, and how long the "pink book" had been in use. When asked if the "pink book" was meant to be a secret within the office, Quinn invoked her Fifth Amendment right against self-incrimination.

Quinn also invoked her Fifth Amendment right against self-incrimination when asked if the Controller's Office became aware of illegal comp time in 1998, whether another Controller's Office audit found the problem again in 2002, and whether it was brought to her attention when David Rouland from the Controller's Office began investigating.

When asked if she destroyed the “pink book” in the beginning of 2010, Quinn invoked her Fifth Amendment right against self-incrimination. Quinn also invoked her Fifth Amendment right against self-incrimination when asked if she thought “off-the-books” comp time was illegal or unethical.

Quinn testified that there was a procedure for keeping track of employee hours in the form of a written sign-in sheet, primarily for payroll purposes. Employees would sign in upon arrival, in and out for lunch time, and out when they left. She stated that two people in the office were authorized to use the payroll system Lawson, and that she was one of them. Quinn noted that Margaret Swartz, Colleen Strunk, and Trish Murphy also did payroll at various points. When asked if there was documentation for requesting time off and if there were absent request forms, Quinn invoked her Fifth Amendment right against self-incrimination.

Quinn testified that spring cleaning was done in the spring, but invoked her Fifth Amendment right against self-incrimination when asked if there is a procedure in place for shredding documents.

Quinn testified that Reilly “knew everything, absolutely everything that was going on in the office” because Reilly was constantly on the phone with the supervisors or Kiefer alone. She categorized Kiefer’s management style as overbearing and micromanaging, as well as very involved with the daily running of the office. She added that no one did anything without Kiefer’s permission.

Testimony of Barbara Reilly

Barbara Reilly is currently employed as the Bucks County Register of Wills⁷. Reilly acknowledged that her position as Register of Wills is an elected position. She testified that she was elected Register of Wills in 1976 and has been employed continuously as the Register of Wills since 1976. She testified that the term for the Register of Wills position is four years. She said that when she ran for the Register of Wills position, she was endorsed by the Republican Party. She explained that before each election, she went through an endorsement process where she was screened by an executive body of the Republican Party and by local committee people. She testified that she has been endorsed by the Republican Party before each election since 1976. Reilly admitted that she has been involved in politics her entire adult life. She testified that prior to being elected Register of Wills in 1976, she was elected Tax Collector in Bensalem. She testified that she held the position of Tax Collector in Bensalem for two terms or eight years. She explained that before being elected to the Tax Collector position, she was endorsed by the Republican Party through the same endorsement process that she went through for the Register of Wills position. She testified that prior to becoming Tax Collector, she held the position of committeeperson in Bensalem. She testified that there is no endorsement process for becoming a committeeperson. She

⁷ Barbara Reilly testified before the grand jury on two previous occasions regarding a subpoena that was served upon her to provide payroll documentation to the grand jury.

explained that to become a committeeperson, a petition is filled out and whoever gets the most votes, wins the position. She testified that she was a committeeperson for "probably" ten to twelve years.

Reilly invoked her Fifth Amendment right against self-incrimination when asked if she held any other duties or obligations to the Republican Party during her 36 years as Register of Wills. She invoked her Fifth Amendment right against self-incrimination when asked whether she was involved in politics beyond the Register of Wills Office. When asked whether she was aware of or whether she authorized the sale of "family trees" from the Register of Wills Office, she invoked her Fifth Amendment right against self-incrimination. When asked whether she was aware of or whether she authorized the use of a "change box" where change was diverted from the office's cash registers to the "change box", she invoked her Fifth Amendment right against self-incrimination.

Reilly testified that she was aware that when she was first sworn as a witness before the Honorable Alan M. Rubenstein, she was warned that she had an oath of secrecy and that she was not to tell anyone what was taking place in this grand jury. When asked if she spoke to any of the witnesses about their testimony, before they came before this grand jury, she invoked her Fifth Amendment right against self-incrimination. When asked if she spoke with Swartz about her testimony, the day before Swartz came before this grand jury, she invoked her Fifth Amendment right against self-incrimination. When asked if she spoke with Cummings about her testimony, the day before Cummings came before this grand jury, she invoked her Fifth Amendment right against self-incrimination.

Reilly invoked her Fifth Amendment right against self-incrimination when asked whether she authorized the use of "off-the-books" comp time to employees to work the election polls. When asked whether she was aware that her employees were being paid "off-the-books" comp time to work the polls on Election Day or Primary Election Day, she invoked her Fifth Amendment right against self-incrimination. When asked if she was aware of or whether she authorized giving her employees' "pink book" time, she invoked her Fifth Amendment right against self-incrimination. When handed Grand Jury 14, C-12, exhibit number 23, the November 1998 audit from the Controller's Office to the Register of Wills and asked whether she recognized it, Reilly invoked her Fifth Amendment right against self-incrimination. When asked if her name was carbon copied on the November 1998 audit, she invoked her Fifth Amendment right against self-incrimination. When asked if she was familiar with the findings from the November 1998 audit regarding compensatory time used in her office, she invoked her Fifth Amendment right against self-incrimination. When asked if she was familiar with the findings from the November 1998 audit regarding the way payroll was done in her office, she invoked her Fifth Amendment right against self-incrimination. When asked whether she was aware of an exit conference that took place on August 7, 1998 with members of the Controller's Office, herself, McCullen, Pappert, and Kiefer, she invoked her Fifth Amendment right against self-incrimination.

When asked whether she has ever seen an absentee request form from her office, Reilly paused and then invoked her Fifth Amendment right against self-incrimination. When asked if she could identify Grand Jury 14, C-12 exhibit number 63 (See "Exhibit D"), an absence request form from March 2006 requesting the balance of unreported comp time that was signed by Kiefer and approved by Quinn, she invoked her Fifth Amendment right against self-incrimination. When asked if she could identify Grand Jury 14, C-12, exhibit number 64 (See "Exhibit E"), an absence request form from Strunk, requesting "pink book" comp time for four specific instances and approved by Kiefer, she invoked her Fifth

Amendment right against self-incrimination. Reilly acknowledged that Kiefer was her Second Deputy when Kiefer was last employed at the Register of Wills. She acknowledged that Quinn was an Administrator when Quinn was last employed at the Register of Wills.

Reilly asserted her Fifth Amendment right against self-incrimination when asked to identify Grand Jury, C-12, exhibit number 57 (See "Exhibit A"), a memorandum dated May 13, 2002, from herself to Linda Wilson. When asked if it was her handwriting on the bottom of exhibit number 57, she invoked her Fifth Amendment right against self-incrimination. When asked if the initials written next to "Barbara G. Reilly" on exhibit number 57 were her initials, she invoked her Fifth Amendment right against self-incrimination. When asked if she recognized Grand Jury 14, C-12, exhibit number 22 (See "Exhibit C"), a May 24, 2002 Register of Wills memorandum from Alyce Luce and Sandy Pappert to all employees about "off-the-books" comp time, she invoked her Fifth Amendment right against self-incrimination. When asked if Luce was an Administrator in the Register of Wills, she invoked her Fifth Amendment right against self-incrimination. When asked if Pappert was a Second Deputy at the Register of Wills before Kiefer, Reilly invoked her Fifth Amendment right against self-incrimination. When asked if Pappert was the Second Deputy at the Register of Wills on May 24, 2002, Reilly invoked her Fifth Amendment right against self-incrimination.

When asked whether Kiefer resigned over the summer of 2010, Reilly testified that Kiefer "retired this summer." Reilly admitted that Kiefer retired through a letter of resignation. Reilly invoked her Fifth Amendment right against self-incrimination when asked whether there was an issue regarding Kiefer's resignation letter. She invoked her Fifth Amendment right against self-incrimination when asked whether she was aware of or whether she authorized Kiefer to backdate her letter of resignation. When asked if she was aware that people who she put in management were mistreating her employees, she invoked her Fifth Amendment right against self-incrimination. When asked by the grand jury what she was writing down during her testimony, she replied that she was writing down notes and then she stated, "I take that back and strike that." She then invoked her Fifth Amendment right against self-incrimination.

CONCLUSION

The foregoing is a summary of the pertinent evidence presented to the Investigating Grand Jury. Although this Presentment does not recite all of the testimony placed before the Grand Jury, this Presentment does contain sufficient evidence upon which to conclude that BARBARA REILLY, REBECCA KEIFER, CANDACE QUINN, and JAMES MCCULLEN engaged in criminal conduct within the Office of the Register of Wills, located at 55 East Court Street, Doylestown, Bucks County, Pennsylvania.

Accordingly, the Grand Jury hereby recommends that the District Attorney of Bucks County arrest and prosecute BARBARA REILLY, REBECCA KEIFER, CANDACE QUINN, and JAMES MCCULLEN for the aforementioned crimes.