

*Rec'd
2/20/2018*

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DYLLER LAW FIRM

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February 16, 2018

Jackie Musto Carroll, Esquire
Luzerne County Right To Know Officer
Luzerne County Office of Law
200 N. River Street
Wilkes-Barre, PA 18711

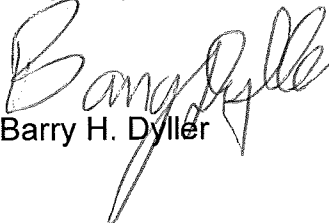
Dear Attorney Carroll:

Enclosed is a Right To Know Request Form with Exhibit A attached.

Please provide me with the identified documents as soon as possible.

If you have any questions, please feel free to call me.

Very truly yours,

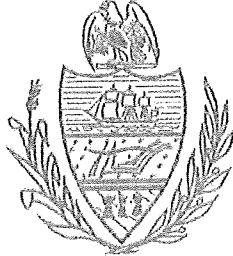

Barry H. Dyller

BHD/nr
enclosure

RTK REQUEST NUMBER

DATE RECEIVED

5 DAY RESPONSE DATE



COUNTY OF LUZERNE

RIGHT TO KNOW LAW REQUEST FORM

NAME OF REQUESTER: Dyller Barry H.
(PLEASE PRINT CLEARLY) LAST FIRST MI

MAILING ADDRESS: Dyller Law Firm, 88 North Franklin Street
STREET / P.O. BOX

Wilkes-Barre PA 18701
CITY STATE ZIP CODE

PHONE # (570) 829-4860 FAX# (570) 825-6675

EMAIL ADDRESS: barry.dyller@dyllerlawfirm.com

SIGNATURE: *Barry Dyller* DATE: 2/16/18

RECORDS REQUESTED - Requesters MUST specify the document(s) sought. Please use additional pages if necessary.

All documents and/or materials identified on Exhibit A attached hereto

PLEASE CHECK ONE OF THE FOLLOWING:

- I AM ONLY REQUESTING ACCESS TO THE DOCUMENT(S)
- I AM REQUESTING A HARD COPY OF THE DOCUMENT(S) (PAPER, CD, etc...)
- I AM REQUESTING AN E-FILE OF THE DOCUMENT(S) (IF AVAILABLE) (PDF, EXCEL SPRDSHT, etc...)

PLEASE NOTE: LUZERNE COUNTY IS NOT REQUIRED TO CREATE A RECORD WHICH DOES NOT CURRENTLY EXIST OR TO COMPILE, MAINTAIN, FORMAT OR ORGANIZE A RECORD IN A MANNER IN WHICH THE AGENCY DOES NOT CURRENTLY COMPILE, MAINTAIN, FORMAT OR ORGANIZE THE RECORD

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Exhibit A

A complete copy of any and all documents and things prepared by and/or maintained by the Luzerne County Correctional Facility (LCCF) relative to all of former inmate **HAILEY POSIVIL'S** incarcerations at LCCF at any time, and her subsequent hospitalization at Wilkes-Barre General Hospital from January 9, 2018 to the present, including but not limited to the following:

1. The entirety of **HAILEY POVISIL'S** Inmate file;
2. Incident report and affiliated documents relative to the incident which occurred on January 9, 2018, resulting in **HAILEY POVISIL's** death;
3. All healthcare records relative to medical, psychiatric and/or Psychological treatment and/or testing received by **HAILEY POVISIL** on or off the LCCF premises;
4. All medical records relative to medical, psychiatric and/or psychological treatment and/or testing received by **HAILEY POVISIL** at LCCF and/or Wilkes-Barre General Hospital;
5. All Investigative Reports in their entirety relative to the cause, manner and circumstances leading up to and surrounding the death of **HAILEY POVISIL**;
6. All photographs, videos and/or audio taping of **HAILEY POVISIL** taken by LCCF personnel or others at the LCCF and/or Wilkes-Barre General Hospital;
7. All photographs, videos and/or digital taping of **HAILEY POVISIL's** prison cell taken by LCCF personnel and/or others;

8. All photographs, videos and/or digital taping of the items(s) Involved in the incident which occurred on January 9, 2018, resulting in **HAILEY POVISIL's** death;
9. All item(s) involved in the incident which occurred on January 9, 2018 resulting in **HAILEY POVISIL's** death;
10. All letters, notes, memoranda, emails and/or texts purportedly written by or to **HAILEY POVISIL**; and
11. All personal items of **HAILEY POVISIL** (Requestor will view and photograph such items at a mutually convenient time);
12. All intake documents and all suicide questionnaires taken relating to **HAILEY POSIVIL's** incarceration at LCCF; and
13. Pursuant to the Coroner's Act, Section 1214 and Sections 1231-1260, a complete copy of any and all documents and things prepared by and/or for and maintained by the Luzerne County Coroner's Office relative to the cause, manner and circumstances leading up to and surrounding the death of **HAILEY POVISIL**, including but not limited to the following:
 - a. Certificate of Death;
 - b. Coroner's Report and all affiliated records;
 - c. Autopsy Report(s);
 - d. Toxicology Reports; and
 - e. Autopsy Photographs.