

**IN THE COURT OF COMMON PLEAS LEBANON COUNTY,
PENNSYLVANIA CIVIL DIVISION**

Meleanie Hain, Appellant	:	No:
	:	
	:	
	:	
V.	:	
	:	
Michael J. DeLeo	:	
Sheriff of Lebanon County	:	

Appeal of Revocation of License Issued pursuant to Pa.C.S.A. §6109

And now comes the appellant above-named, by and through her counsel, Worth, Magee and Fisher, P.C. and files this Appeal from the Decision of the Sheriff of Lebanon County to revoke the License previously issued by the Sheriff to the Appellant pursuant to §6109 of the Pennsylvania Uniform Firearms Act ("UFA") and, in support thereof, states the following:

1. In February 2007, upon application of the Appellant, the Sheriff of Lebanon County, after conducting the investigation set forth in §6109(d) of the UFA, issued to the Appellant a License to Carry a Concealed Firearm;
2. Thereafter, by letter dated September 17, 2008, the Sheriff purported to revoke that license. A true and correct copy of the revocation notice is attached hereto as Exhibit "A";
3. While the applicable provisions of the UFA does provide the Sheriff with authority to revoke such a license once issued, such revocation can only

- take place "for good cause shown" or if the licensee falls into a particular category of individuals specifically set forth in §6109(i);
4. Furthermore, the UFA provides that the notice of revocation shall state the specific reason for revocation;
 5. The appellant herein does not fall into any of the specifically enumerated categories of individuals who have lost their eligibility for the License, and it is respectfully submitted that legally and openly carrying a firearm and thereby "upsetting" some individuals who observed such does not constitute the "good cause" contemplated by the statute;
 6. Accordingly, it is submitted that the Sheriff of Lebanon County abused his discretion and the authority granted to him under the UFA, committed an error of law and otherwise acted illegally by revoking the license previously issued to the Appellant.

WHEREFORE, the appellant request this honorable court to reverse the decision of the Sheriff and to order the Sheriff of Lebanon County to reissue the license under §6109 of the UFA.

Respectfully submitted,

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