

**COMMONWEALTH OF PENNSYLVANIA  
COURT OF JUDICIAL DISCIPLINE**

RECEIVED AND FILED  
APR 10 2024  
COURT OF JUDICIAL DISCIPLINE  
OF PENNSYLVANIA

IN RE:

Judge Sonya M. McKnight :  
Magisterial District Judge : 1 JD 2021  
Magisterial District Court 12-2-04 : 2 JD 2023  
12<sup>th</sup> Judicial District :  
Dauphin County :

**JUDICIAL CONDUCT BOARD PRE-TRIAL MEMORANDUM**

AND NOW, this 10<sup>th</sup> Day of April, 2024, comes the Judicial Conduct Board of the Commonwealth of Pennsylvania (Board) by and through undersigned counsel, pursuant to this Court's February 1, 2024, Order and files this Pre-trial Memorandum:

A. TRIAL WITNESS LIST

The Board may call some or all of the following witnesses at trial:

1. Georgette Morrison (Potts)  
7 Peach Lane  
Carlisle, PA 17015

Ms. Morrison will testify regarding paragraphs 5 through 10 and 15 through 20 of the Board's Complaint.

2. J'Nai Stinson  
3343 Jonagold Drive  
Harrisburg, PA 17110

Ms. Stinson will testify regarding paragraphs 5 through 10 and 15 through 20 of the Board's Complaint.

3. Kimberly Ross-Seals  
1910 Chestnut Street  
Harrisburg, PA 17104

Ms. Ross-Seals will testify regarding paragraphs 5 through 10, 15 and 20 of the Board's Complaint.

4. Karen Johnson  
5 A Gloucester Road  
Harrisburg, PA 17109

Ms. Johnson will testify regarding paragraphs 21 through 27 of the Board's Complaint.

5. Troy Petery  
Dauphin County Deputy Court Administrator – Criminal  
Dauphin County Administration Building  
2 South Second Street, 3<sup>rd</sup> Floor  
Harrisburg, PA 17101

Deputy District Court Administrator Petery will testify regarding paragraphs 52 through 57 of the Board's Complaint.

6. Leo P. Zuvich  
Judicial Conduct Board Investigator  
Pennsylvania Judicial Center  
601 Commonwealth Avenue, Suite 3500  
Harrisburg, PA 17120

Investigator Zuvich will testify regarding paragraphs 47 through 51 of the Board's Complaint.

7. Deborah S. Freeman, Esquire  
702 Laurel Lane  
Lykens, PA 17048

Former District Court Administrator Freeman will testify regarding paragraphs 28 through 34 of the Board's Complaint.

8. Brian Perry, Esquire  
300 Corporate Center Drive, Suite 200  
Camp Hill, PA 17011

Attorney Perry will testify regarding paragraphs 28 through 34 of the Board's Complaint.

9. John Robinette, Esquire  
Dauphin County District Attorney's Office  
101 Market Street, Room 205  
Harrisburg, PA 17101

Attorney Robinette will testify regarding paragraphs 35 through 46 of the Board's Complaint.

10. Barbara Pianka  
2811 North 2<sup>nd</sup> Street  
Harrisburg, PA 17110

Former Magisterial District Court Judge Pianka will testify regarding paragraphs 52 through 57 of the Board's Complaint.

11. Rebecca Jo Margerum, Esquire  
185 Manors Road, Suite 1  
Elizabethville, PA 17023

Magisterial District Court Judge Margerum will testify regarding paragraphs 55 through 57 of the Board's Complaint.

B. BOARD EXHIBITS

The Board may introduce some or all of the following exhibits at trial, in its case in chief:

1. Court of Judicial Discipline's Order of January 31, 2023, directing Judge McKnight be placed on probation for one-year.
2. The Judicial Conduct Board's (Board) October 13, 2022, Notice of Full Investigation (NOFI) sent to Judge McKnight.
3. A true and correct copy of Judge McKnight's response to the Board's NOFI dated November 7, 2022.
4. A true and correct copy of Judge McKnight's response to the Board's NOFI dated January 24, 2023.
5. The transcript from the Board's June 22, 2023, deposition of Judge McKnight.

6. Kimberly Ross-Seals' civil complaint and check received March 23, 2022, in Judge McKnight's court office.
7. The June 23, 2022, email from Dauphin County Court Administrator, Deborah Freeman sent to Judge McKnight wherein she was advised not to preside over matters involving attorney Brian Perry.
8. The Uniform Judicial System (UJS) docket sheet for *Commonwealth of Pennsylvania v. William Ingram, III*, docket number MJ-12204-CR-127-2022.
9. The UJS docket sheet for *Commonwealth of Pennsylvania v. William Ingram, III*, docket number MJ-12204-TR-1151-2022.
10. The UJS docket sheet for *Commonwealth of Pennsylvania v. Dominic Aaron Reynolds*, docket number MJ-12204-CR-75-2022.
11. The UJS docket sheet for *Commonwealth of Pennsylvania v. Dominic Aaron Reynolds*, docket number MJ-12204-CR-103-2022.
12. The UJS docket sheet for *Commonwealth of Pennsylvania v. Cindy Louise Turner*, docket number MJ-12104-CR-316-2022.
13. Screenshot of Judge McKnight's Facebook page entitled 'Sonya Marie.'
14. Screenshot of Judge McKnight's Facebook page wherein Sonya Marie is identified as a judge and contained pictures of Judge McKnight in her judicial robe.
15. Screenshot of Judge McKnight's Facebook page from May 5, 2023, wherein she posted a picture of a product called 'X-it Red,' with the following statement, 'You do not want to miss out on this great business opportunity!!! All I can say is...it works, it's worth it, So let's

get it. Reach out to me through messenger, phone or text.'

16. The 2023 Dauphin County Magisterial District Judge night court calendar.
17. Former Dauphin County President Judge John Cherry's January 27, 2023, administrative Order directing that Judge McKnight cover February on-call duty for Judge Rebecca Jo Margerum and Judge Barbara Pianka.

C. STIPULATIONS

It can reasonably be expected that opposing counsel will agree to the following stipulations:

1. Article V, § 18 of the Constitution of the Commonwealth of Pennsylvania grants to the Board the authority to determine whether there is probable cause to file formal charges against a judicial officer in this Court, and thereafter, to prosecute the case in support of such charges in this Court.
2. From January 4, 2016 to February 9, 2021, Judge McKnight served as Magisterial District Judge for Magisterial District 12-2-04, Dauphin County, Pennsylvania.
3. From February 9, 2021 through August 18, 2021, Judge McKnight was suspended from her duties as Magisterial District Judge. *In re McKnight*, 1 JD 2021.
4. From February 9, 2023 through February 18, 2023, Judge McKnight was suspended from her duties as Magisterial District Judge. *In re McKnight*, 1 JD 2021.

5. On January 31, 2023, Judge McKnight was placed on probation by the Court of Judicial Discipline until January 31, 2024, *In re McKnight*, 1 JD 2021.
6. A specific condition of Judge McKnight's probation was that "Magisterial District Judge McKnight not commit any more ethical violations of any nature."
7. On November 14, 2023, Judge McKnight was suspended from her duties as Magisterial District Judge. *In re McKnight*, 1 JD 2021, 2 JD 2023.
8. Pursuant to Article V, § 18(a)(7) of the Constitution of the Commonwealth of Pennsylvania, the Board determined that there is probable cause to file formal charges against Judge McKnight in this Court.
9. On October 13, 2022, Board counsel sent Judge McKnight a Notice of Full Investigation and inquired as to whether she had given her employees extra vacation leave in November 2021.
10. Judge McKnight submitted two (2) responses to the Notice of Full Investigation on November 7, 2022, and January 24, 2023, in which she denied she granted her employees vacation leave in 2021.
11. J'Naia Stinson was employed by Dauphin County as a clerk in Judge McKnight's Magisterial District Court Office.
12. Karen Johnson has been employed by Dauphin County in various capacities since 1999.
13. On December 16, 2020, the Pennsylvania Office of Attorney General charged Judge McKnight with the criminal charges of tampering with

- evidence, obstructing the administration of law and official oppression.
14. Judge McKnight's criminal trial on the charges was scheduled to begin July 26, 2021, in the Dauphin County Courthouse.
  15. Attorney Brian Perry represented Judge McKnight from 2019 until December 2020.
  16. On July 23, 2021, Judge McKnight filed a Citizen's Complaint with the City of Harrisburg against Harrisburg City Police Officer Anthony Cummings and three (3) other officers who were involved in her arrest and criminal charges.
  17. Judge McKnight alleged in her Citizen's Complaint that Officer Cummings and the three (3) other Harrisburg City Police Department Officers, conspired together to destroy her character and credibility in the community.
  18. On July 26, 2021, Officer Cummings testified for the Commonwealth during Judge McKnight's criminal trial.
  19. On April 1, 2022, Officer Cummings filed a criminal complaint in the matter of *Commonwealth v. Dominic Aaron Reynolds*, wherein Mr. Reynolds was charged with possession of firearm prohibited and possession of drug paraphernalia.
  20. During the June 6, 2022, preliminary hearing, Judge McKnight stopped the proceeding and requested the case be transferred to another Magisterial District Judge based on her prior involvement in the matter.
  21. The Dauphin County Magisterial District Judge night court calendar for 2023, was provided to the magisterial district judges on June 18, 2022.

22. According to the night court calendar, Judge McKnight was scheduled to work night court starting the morning of January 14, 2023, until Thursday, January 20, 2023.

23. District Court Administrator Petery was unable to make contact with Judge McKnight on her cell phone.

D. DISCOVERY CERTIFICATION

The Board, by and through undersigned counsel, hereby certifies that it has provided to Judge McKnight all materials required to be exchanged under C.J.D.R.P. No. 401(D)(1).

E. EXCULPATORY EVIDENCE CERTIFICATION

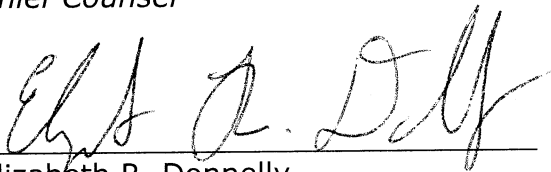
The Board, by and through undersigned counsel, hereby certifies that it has provided to Judge McKnight all materials required to be exchanged under C.J.D.R.P. No. 401(E).

Respectfully submitted,

Melissa L. Norton  
*Chief Counsel*

April 10, 2024

By:

  
Elizabeth R. Donnelly  
*Deputy Counsel*  
Pa. Supreme Court ID No. 308085  
Judicial Conduct Board  
Pennsylvania Judicial Center  
601 Commonwealth Avenue, Suite 3500  
P.O. Box 62525  
Harrisburg, PA 17106  
(717) 234-7911



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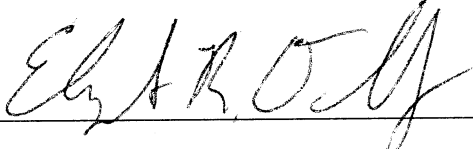
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Magisterial District Court 12-2-04	:	2 JD 2023
12 <sup>th</sup> Judicial District	:	
Dauphin County	:	

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Judicial Conduct Board of Pennsylvania

Signature:



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Name:

Elizabeth R. Donnelly  
*Deputy Counsel*

Attorney No:

308085

**COMMONWEALTH OF PENNSYLVANIA  
COURT OF JUDICIAL DISCIPLINE**

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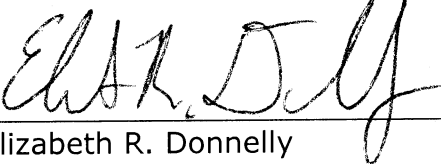
**PROOF OF SERVICE**

In compliance with Rule 122 of the Court of Judicial Discipline Rules of Procedure, on April 10, 2024, a copy of the Board's Pre-Trial Memorandum was sent by UPS Overnight Mail and Email to John G. Bravacos, III, Esquire as follows:

John G. Bravacos, Esquire  
30 Keldon Court  
Glenmoore, PA 19343  
Email: [John@Bravacoslaw.com](mailto:John@Bravacoslaw.com)

April 10, 2024

By:

  
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Elizabeth R. Donnelly  
*Deputy Counsel*  
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