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Attorneys for Plaintiff
Frank W. Peranteau, Sr.

**FRANK W. PERANTEAU, SR., in his
official capacity as Mayor of the Borough
of Bristol and in his individual capacity,**
250 Pond Street, Bristol, PA 19007

Plaintiff,

v.

BRISTOL BOROUGH COUNCIL,
250 Pond Street, Bristol, PA 19007

**BETTY RODRIGUEZ, in her official
capacity as Bristol Borough Council Vice-
President,**
250 Pond Street, Bristol, PA 19007

**BRYAN JOHNSON, in his official
capacity as Member of Bristol Borough
Council,**
250 Pond Street, Bristol, PA 19007

**GREG PEZZA, in his official capacity as
Member of Bristol Borough Council,**
250 Pond Street, Bristol, PA 19007

**LEE COUSIN, in his official capacity as
Member of Bristol Borough Council,**
250 Pond Street, Bristol, PA 19007

**LORRAINE CULLEN, in her official
capacity as Member of Bristol Borough
Council,**
250 Pond Street, Bristol, PA 19007

**COURT OF COMMON PLEAS
OF BUCKS COUNTY,
PENNSYLVANIA**

CIVIL ACTION – LAW

NO. 2026-02278-0

JUDGE NO. 39

**LOUIS QUATTROCCHI, in his official
capacity as Member of Bristol Borough
Council,**
250 Pond Street, Bristol, PA 19007

**MARIA FIGUEROA, in her official
capacity as Member of Bristol Borough
Council,**
250 Pond Street, Bristol, PA 19007

**RALPH DIGUISEPPE, in his official
capacity as Bristol Borough Council
President,**
250 Pond Street, Bristol, PA 19007

Defendants.

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Bucks County Bar Association
Lawyer Referral and Information Service
135 East State Street
Doylestown, PA 18901
(215) 348-9413

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Defendants.

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiff Frank W. Peranteau, Sr., Mayor of the Borough of Bristol, by and through his undersigned counsel, Saxton & Stump, LLC, brings this Complaint against Defendants Bristol Borough Council and its Members in their official capacities, and in support thereof avers as follows:

THE PARTIES

1. Plaintiff Frank W. Peranteau, Sr. (the “Mayor”) is an adult individual residing in the Borough of Bristol, Bucks County, Pennsylvania, and is the duly elected Mayor of the Borough of Bristol (the “Borough”), with an office at 250 Pond Street, Bristol, Pennsylvania 19007.

2. The Mayor brings this action in his official capacity as Mayor of the Borough and in his individual capacity as a resident and taxpayer of the Borough.

3. Defendant Bristol Borough Council (“Council”) is the elected legislative body of the Borough, organized and existing under the Borough Code.¹ *See* 8 Pa.C.S. § 101 *et seq.* Council maintains its offices at 250 Pond Street, Bristol, Pennsylvania 19007.

4. Council is an “agency” within the meaning of Section 703 of the Sunshine Act, 65 Pa.C.S. § 703.

5. Defendant Betty Rodriguez is a Member and the Vice-President of Council and is sued in her official capacity, with an address of 250 Pond Street, Bristol, Pennsylvania 19007.

6. Defendants Bryan Johnson, Greg Pezza, Lee Cousin, Lorraine Cullen, Louis Quattrocchi, and Maria Figueroa are Members of Council and are sued in their official capacities, each with an address of 250 Pond Street, Bristol, Pennsylvania 19007.

7. Defendant Ralph DiGuiseppe is a Member and the President of Council (the “Council President”) and is sued in his official capacity, with an address of 250 Pond Street, Bristol, Pennsylvania 19007.

JURISDICTION AND VENUE

8. This Court has jurisdiction over this action pursuant to Section 931(a) of the Judicial Code, *see* 42 Pa.C.S. § 931(a), and, as to Count IV, pursuant to Section 715 of the Sunshine Act, *see* 65 Pa.C.S. § 715.

¹Act of April 18, 2014, P.L. 432, No. 37, as amended, 8 Pa.C.S. §§ 101–3501.

9. This Court is empowered to declare the rights, status, and other legal relations of the parties pursuant to the Declaratory Judgments Act, *see* 42 Pa.C.S. §§ 7531–7541.

10. Because the cause of action arose in Bucks County and all parties may be served there, venue is proper in Bucks County pursuant to Rule of Civil Procedure 1006. *See* Pa.R.Civ.P. 1006.

11. Plaintiff commenced this action by praecipe for writ of summons filed on April 9, 2026, which writ was thereafter duly served by the Sheriff within the time prescribed by the Pennsylvania Rules of Civil Procedure.

FACTUAL BACKGROUND

A. The Borough Code's Allocation of Authority Over the Police Force

12. The Borough is a political subdivision and municipality within the Commonwealth of Pennsylvania.

13. Because municipalities have no inherent powers beyond those given to them by the Commonwealth, the duties and powers of the Borough—and its officials—are subject to the laws of the Commonwealth.

14. Because the Borough has not adopted a home rule charter, its form of government is established by the Borough Code, along with any other statutes generally applicable to municipalities.

15. The Borough Code divides the government of a borough between two separately elected branches: a legislative branch, consisting of council, and an executive branch, consisting of the mayor. *See* 8 Pa.C.S. §§ 1005–1006, 10A06–10A07.

16. More than sixty years ago, the Supreme Court of Pennsylvania observed that the Borough Code “has not provided for a more understanding and pragmatic cooperation between the Executive and the Legislative branches of municipal government in the field of police administration.” *Bosler v. Rahn*, 151 A.2d 627, 629 (Pa. 1959).

17. Of the two branches, council holds by far the larger share of the Borough’s power, because the Borough Code vests “[t]he powers of the borough” in council and then enumerates sixty-five of them. 8 Pa.C.S. § 1202.

18. Those enumerated powers run from the prescription of fees for the services of borough officers, to the definition of disorderly conduct within the Borough, to the collection of municipal claims. *See id.* § 1202(1), (14), (65).

19. Council exercises those powers only as a body, by vote of a majority at a meeting, and every legislative act of council must be by ordinance. *See id.* §§ 1006(4), 3301.1(b).

20. The mayor’s authority is of a different character: it is not general but enumerated, and the Borough Code sets it out in two short sections. *See id.* §§ 10A06, 10A07.

21. The mayor’s general powers are two — to administer oaths and affirmations in matters pertaining to borough affairs, and to act in emergencies to preserve the public peace. *See id.* § 10A06(a)–(b).

22. The mayor’s duties are similarly specific: to preserve order in the Borough, to enforce its ordinances and regulations, to remove nuisances, to exact a

faithful performance of the duties of the officers appointed, to sign papers and documents as required by law, and to report and make recommendations to council. *See id.* § 10A07(1)–(3); *see also Hoffman v. Borough of Macungie*, 63 A.3d 461, 469 (Pa. Cmwlth. 2013) (describing the same list as “a mayor’s enumerated duties”).

23. In one field, however, the Borough Code does not parcel the mayor’s authority into enumerated grants but confers it whole — the field that is the first office of any executive, public safety, and within that field, the police force. *See* 8 Pa.C.S. § 1123.1.

24. There the Borough Code speaks in the language of charge and control rather than enumeration, and the mayor accordingly “has the ultimate executive authority over the manner in which the Police Department operates.” *Hoffman*, 63 A.3d at 470.

25. Section 1123.1(a) of the Borough Code provides: “The mayor shall have full charge and control of the chief of police and the police force.” 8 Pa.C.S. § 1123.1(a).

26. Section 1123.1(b) of the Borough Code provides: “The mayor shall direct the time during which, the place where and the manner in which the chief of police and the police force perform the duties of their rank.” 8 Pa.C.S. § 1123.1(b).

27. Section 1123.1(c) of the Borough Code commits any delegation of supervision to the Mayor’s discretion: “The mayor may delegate to the chief of police or other officer supervision over and instruction to subordinate officers in the manner of performing their duties.” 8 Pa.C.S. § 1123.1(c).

28. Section 10A07(1) of the Borough Code imposes on the mayor the duty “[t]o preserve order in the borough, to enforce the ordinances and regulations, to remove nuisances, to exact a faithful performance of the duties of the officers appointed and to perform any other duties as shall be vested in the mayor’s office by law or ordinance.” 8 Pa.C.S. § 10A07(1).

29. Council’s powers concerning the police force are enumerated in Section 1121(a) of the Borough Code: council may, by ordinance, establish a police department; may appoint police officers, subject to civil service; may remove, suspend, or reduce in rank a police officer, subject to statutory procedures; shall designate the ranks in the police department and the duties of each rank; may provide for training; and shall determine the total weekly hours of employment. *See* 8 Pa.C.S. § 1121(a).

30. Section 1124 of the Borough Code separately preserves to the mayor an independent power of discipline: “In addition to the powers of council to suspend police officers, the mayor may, for cause and without pay, suspend any police officers until the succeeding regular meeting of the council,” at which time council may act, subject to civil service; and council may not reinstate an officer suspended by the mayor earlier than ten working days from the date fixed by the mayor. 8 Pa.C.S. § 1124(a)–(b).

31. Under this statutory allocation, council organizes the police department and fixes the duties of each rank, but the mayor — not council, its president, or any council designee — supervises and directs the chief of police and the police force in

the performance of those duties. *See Salopek v. Alberts*, 209 A.2d 295, 298 (Pa. 1965) (“The duties to be performed by the several ranks of police officers are within the prerogative of the council to designate; the manner in which the designated duties are to be performed is the prerogative of the mayor.”); *Hoffman*, 63 A.3d at 470.

B. The Borough’s Own Ordinances Confirm the Same Allocation

32. The Borough’s police department was established by ordinance, as Section 1121(a) of the Borough Code requires.

33. Chapter 1, Part 6 of the Borough’s codified ordinances, enacted as Ordinance No. 751 (March 15, 1971) and amended by Ordinance No. 777 (1972) and Ordinance No. 987 (1984), establishes the Bristol Borough Police Department (the “Department”).

34. Section 1-601 of the Borough Code of Ordinances provides that the Chief of Police “shall, under the direction of the Mayor, be in charge of the police force and have supervision over its members in the exercise of their powers, duties and authority.” Borough of Bristol Code, ch. 1, § 1-601.

35. Section 1-602 of the Borough Code of Ordinances establishes the subordinate classifications of the Department — sergeants, corporals, and patrolmen, in numbers authorized by Council from time to time. Borough of Bristol Code, ch. 1, § 1-602.

36. In 2025, when Council determined to restructure the Department by creating the position of Lieutenant of Police, it proceeded exactly as the Borough Code directs: it enacted Ordinance No. 1378, an ordinance amending Chapter 1, Part 6, §§ 1-601 and 1-602, “after due consideration of the proposed Ordinance at a

duly advertised public hearing,” and the enacted ordinance was examined and approved by the Mayor. A true and correct copy of Ordinance No. 1378 is attached hereto as Exhibit J.

37. As amended by Ordinance No. 1378, Section 1-601 continues to provide that the Chief of Police shall be the chief executive of the Department and shall be in charge of the police force and have supervision over its members “in accordance with the provisions of the Pennsylvania Borough Code” — the Code that vests full charge and control of the chief and the force in the Mayor.

38. The Borough’s ordinances likewise commit the review of public complaints against officers to a body that reports to the Mayor, not to Council: Chapter 1, Part 13 of the Borough Code of Ordinances, enacted as Ordinance No. 1161 (2001) and amended by Ordinance No. 1303 (2014), establishes the Bristol Borough Police Civilian Complaint Review Board, “an independent, nonpolice municipal agency” that “receives, investigates, and makes findings to the Chief of [Police] and to the Mayor” on complaints of abuse of authority, including complaints alleging violations of Department policies or the failure to perform required duties. Borough of Bristol Code, ch. 1, §§ 1-1301, 1-1302.

39. The Borough’s manager ordinance respects the same boundary: the Borough Manager’s powers and duties “relate to the general management of all Borough business not expressly by statute imposed or conferred upon other Borough officers.” Borough of Bristol Code, ch. 1, § 1-326.1.

C. Officer Webb’s Complaints and the Borough’s Response

40. Ritchie Webb, Jr. (“Officer Webb”) is a police officer of the Department.

41. On April 3, 2025, Officer Webb responded in the line of duty to a catastrophic incident involving an Amtrak train in which three Borough residents were struck and killed.

42. Officer Webb has not returned to active duty since that date.

43. Following the April 3, 2025 incident, Officer Webb remained out of work on workers' compensation while receiving treatment.

44. On or about January 27, 2026, Officer Webb was cleared to return to work by his treating provider.

45. By letter dated January 30, 2026, Borough Manager James J. Dillon acknowledged Officer Webb's medical clearance but advised that the Borough would require an independent medical examination before his return to service. A true and correct copy of the January 30, 2026 letter is attached hereto as Exhibit B.

46. On February 7, 2026, Officer Webb sent an email addressed to the Mayor and Borough Council placing them "on formal notice regarding a continuing pattern of retaliation, obstruction, and abuse of authority in connection with [his] medical clearance and attempted return to duty," and describing, among other things, reports he had made of alleged misconduct within the Department, including allegations against Chief of Police Joseph Moors (the "Chief").

47. By letter dated February 11, 2026, the Council President responded to Officer Webb's February 7, 2026 email, stating that "[i]nvestigation of all complaints contained in your e-mail has been assigned to outside labor and employment counsel at the firm of Campbell Durrant, P.C.," and that "Campbell

Durrant has been hired as the Borough's labor and employment counsel." A true and correct copy of the February 11, 2026 letter is attached hereto as Exhibit C.

48. A review of the agendas and minutes of Council's public meetings reflects that, as of February 11, 2026, Council had taken no vote at any public meeting to engage Campbell Durrant, P.C.; the engagement was presented for a public vote for the first time at Council's March 9, 2026 meeting, after the firm had already been retained and had begun its work.

49. On February 9, 2026, Council held a regular public meeting followed by an executive session attended by, among others, the Chief and the Mayor.

50. At the February 9, 2026 executive session, the Mayor stated to those present, including the Chief, that any action concerning any officer of the Department must include the Mayor's involvement before such action is taken.

51. Notwithstanding the Mayor's directive, in mid-February 2026 the Chief scheduled an independent medical examination of Officer Webb, and formulated related protocols, in consultation with the Borough's outside labor counsel and the Council President — and without the Mayor's involvement.

52. By email dated February 20, 2026, the Chief acknowledged to the Mayor that "the decision regarding Officer Webbs' IME was made in consultation with the Borough labor attorney and the Borough Council President."

53. By letter dated February 25, 2026, the Council President forwarded Officer Webb's February 7, 2026 complaint to the District Attorney of Bucks County, reporting the criminal allegations contained in it and encouraging the

District Attorney's office to investigate. A true and correct copy of the February 25, 2026 letter is attached hereto as Exhibit D.

54. By letter dated February 25, 2026, the Chief directed Officer Webb to attend an investigative interview with the Borough's outside labor counsel on March 2, 2026.

D. The Mayor's March 8, 2026 Directives

55. On March 8, 2026, in the exercise of his authority under Sections 1123.1 and 10A07 of the Borough Code, the Mayor issued a written directive to the Chief ordering that the Chief have no contact with Officer Webb regarding the investigation commissioned by Council or the independent medical examination, and that all information and correspondence regarding the examination be managed through the Mayor's office. A true and correct copy of the Mayor's March 8, 2026 directive to the Chief is attached hereto as Exhibit E.

56. Also on March 8, 2026, the Mayor issued a written directive to Officer Webb ordering him not to take part in the investigation assigned to outside labor counsel; ordering him to cooperate with the District Attorney's investigation; and ordering him to appear for his independent medical examination and to provide the examining physician with all pertinent treatment information. A true and correct copy of the Mayor's March 8, 2026 directive to Officer Webb is attached hereto as Exhibit F.

57. By email sent March 8, 2026 at 9:23 p.m., the Mayor transmitted both directives to the Council President and to the Borough's outside labor counsel.

E. Council's Secret Countermand of the Mayor's Directives

58. On the evening of Monday, March 9, 2026, Council held its regular monthly public meeting at Borough Hall.

59. Before the March 9, 2026 public meeting, Council convened an executive session from which the public was excluded.

60. At the conclusion of the March 9, 2026 public meeting, it was announced that Council had met in executive session prior to the meeting to discuss personnel matters.

61. Upon information and belief — and based on the Council President's subsequent written representation that he wrote “on behalf of Borough Council,” as set forth in Paragraph 63 below — at the March 9, 2026 executive session a quorum of Council deliberated upon, voted on, and decided to countermand the Mayor's March 8, 2026 directives and to issue orders of its own directly to Officer Webb.

62. A review of the agenda and minutes of the March 9, 2026 public meeting reflects that no vote to countermand the Mayor's directives, to issue orders to Officer Webb, or to take any related action was taken at that public meeting.

63. By letter to the Mayor dated March 9, 2026, the Council President, writing “on behalf of Borough Council,” stated that Council was acting “to correct your March 8, 2026 letter and countermand your orders to Officer Webb and Chief Joseph Moors.” A true and correct copy of the March 9, 2026 letter is attached hereto as Exhibit G.

64. The March 9, 2026 letter, although dated March 9, 2026, was not received by the Mayor until March 10, 2026.

65. The March 9, 2026 letter asserted that “Borough Council has the ultimate authority and is the final decision maker with exclusive authority to assign the Chief’s duties and to decide how discipline is to be imposed in the event of police misconduct,” and attributed that proposition to “the Supreme Court of Pennsylvania case of *Salopek v Albert*,” which the letter described as establishing that “the Mayor’s powers are limited to supervising the Chief in his execution of the duties that are assigned by Council.”

66. *Salopek v. Alberts* holds no such thing.

67. *Salopek* reaffirms that the mayor possesses full charge and control of the chief of police and the police force and directs the time, place, and manner in which the chief and the force perform the duties of their rank, and it holds only that the mayor may not assign the council-appointed chief of police to perform the duties of a different, lower rank where council has taken official action, by ordinance, delineating the duties to be performed by each rank. *See Salopek*, 209 A.2d at 297–98.

68. The March 9, 2026 letter, despite purporting to reflect the decision of the entire council as a deliberative body, did not disclose the timing, nature, or result of the vote taken, or, for that matter, acknowledge that any official action had occurred at the executive session held earlier that day.

69. By letter to Officer Webb dated March 10, 2026, captioned “RE: Orders to Cooperate,” the Council President stated: “Please be advised that Borough Council has countermanded the orders issued to you by Mayor Frank Peranteau, Sr., on

March 8, 2026.” A true and correct copy of the March 10, 2026 letter is attached hereto as Exhibit H.

70. The March 10, 2026 letter did not merely rescind the Mayor’s directives; it issued a series of direct commands to Officer Webb—in Council’s name—stating among other things that Officer Webb was “ordered to fully cooperate” with identified investigations, “ordered to appear on Monday, March 30, 2026 at Borough Hall at 10 a.m.” for an interview with outside labor counsel, and “further ordered to attend the rescheduled Fitness for Duty exam.”

71. No public meeting of Council occurred between the March 9, 2026 meeting and the issuance of the March 10, 2026 letter.

72. A review of the agendas and minutes of Council’s public meetings from March 9, 2026 through the commencement of this action reflects that Council’s purported decision to countermand the Mayor’s March 8, 2026 directives was not—and has never been—voted on, recorded, or otherwise mentioned or memorialized in any public meeting; nor is there any publicly available information suggesting or showing Council’s purported will to authorize, ratify, or adopt the orders contained in the March 10, 2026 letter.

73. No communication disclosing that Council had taken official action at the March 9, 2026 executive session reached the Mayor, or anyone else outside that session, before March 10, 2026.

74. On March 10, 2026, the Mayor received the letter dated March 9, 2026, and thereafter the letter dated March 10, 2026 announcing that “Borough Council

has countermanded” his directives; those letters were the first disclosure to the Mayor that Council had taken official action on the matter.

75. The Mayor did not learn, and could not have learned, at any time before March 10, 2026 that official action had been taken at the March 9, 2026 executive session.

F. The March 23, 2026 Letter

76. By letter to the Mayor dated March 23, 2026, captioned “RE: Confidential Borough Council Investigation,” the Council President renewed Council’s demand that the Mayor recuse himself from all matters involving Officer Webb and withdraw his directives to Officer Webb and the Chief. A true and correct copy of the March 23, 2026 letter is attached hereto as Exhibit I.

77. The March 23, 2026 letter advised the Mayor: “You are on notice that you are being investigated as part of the Webb investigation.”

78. The March 23, 2026 letter further stated that Council “will notify the Borough’s insurance carrier that your conflicted outside of your powers actions voids any insurance coverage provided to you as Mayor under the Borough’s insurance policies,” and that Council would request “that you not receive any insurance coverage.”

79. The March 23, 2026 letter closed by stating that “Council instructs you to keep all this information confidential.”

80. A review of the agendas and minutes of Council’s public meetings reflects that no vote authorizing the actions announced in the March 23, 2026 letter was taken at any public meeting.

G. Resolution 2026-09 and the “Revised Internal Affairs Policy”

81. On Tuesday, March 24, 2026, Council adopted Resolution No. 2026-09, entitled “Resolution Adopting the Police Department’s Revised Internal Affairs Policy.” A true and correct copy of Resolution 2026-09, including its Exhibit “A,” is attached hereto as Exhibit A.

82. Resolution 2026-09 resolves that Council “adopts the Police Departments revised Internal Affairs Policy, which is effective immediately,” attaches the policy as Exhibit “A” (the “IA Policy”), and provides that “[t]he Policy shall supersede all prior Police Department policies that pertain to internal affairs investigations, which are hereby repealed.”

83. Before Resolution 2026-09, internal affairs investigations in the Department were governed by a general order of the Department issued through the police chain of command — most recently, a policy effective August 1, 2018, issued by order of the then-Chief of Police — under which the chief of police coordinated internal affairs investigations, subject to the Mayor’s statutory supervision.

84. Upon information and belief, the IA Policy adopted by Resolution 2026-09 is substantially identical to a policy previously attached as Exhibit “A” to Council’s Resolution 2025-12.

85. The IA Policy is not confined to the internal procedures of Council.

86. The IA Policy is a standing regulatory scheme of general and indefinite application that governs the conduct of every officer of the Department and

reallocates supervision of the Department from the Mayor to Council and Council's designees.

87. Among other things, the IA Policy directs that officers who receive complaints report them "to the Chief of Police or to the Chief's designee or to the person designated by Council to supervise the police department."

88. The IA Policy provides that complaint records shall be "maintained in a secure location by the person(s) designated by Council to conduct an investigation."

89. The IA Policy provides that "[a]ll officers are obligated to cooperate in internal affairs investigations as required by Council, which includes providing truthful responses to inquiries made by the Council's designated investigator."

90. The IA Policy provides that "Council reserves its authority to designate a qualified person to conduct the investigation" where Council determines that the Chief or "the person designated to supervise the police department" should not do so.

91. The IA Policy provides that a "person designated to supervise the police department" may impose a temporary paid administrative leave on an officer.

92. The IA Policy declares: "Authority to impose final disciplinary action against a Borough police officer that rises to the level of suspension, demotion or termination rests exclusively with the Council."

93. The IA Policy treats the Mayor not as the official in full charge and control of the police force, but as a recipient of information: it directs that the policy

“be issued to the Mayor and all Borough police officers,” and permits amendment only “as authorized by the Council.”

94. The premise of the IA Policy — a standing “person designated by Council to supervise the police department” — has no source in the Borough Code, which vests supervision of the police force in the Mayor, 8 Pa.C.S. § 1123.1(a)–(b), and commits any delegation of that supervision to the Mayor’s discretion, *id.* § 1123.1(c); nor in the Borough’s own ordinances, which place the Chief “under the direction of the Mayor,” Borough of Bristol Code, ch. 1, § 1-601.

95. Resolution 2026-09 was not advertised as a proposed ordinance, was not presented to the Mayor for approval or veto, and was not recorded in the Borough’s ordinance book as an ordinance.

COUNT I

Declaratory Judgment — 42 Pa.C.S. §§ 7532–7533 — Resolution 2026-09 and the IA Policy Are Ultra Vires, Preempted by and in Conflict with the Borough Code, and Void (Plaintiff v. All Defendants)

96. Plaintiff incorporates by reference each of the preceding paragraphs of this Complaint as though the same were fully set forth at length herein.

97. A municipal corporation is a creature of the Commonwealth: it possesses only those powers of government that the Constitution or the General Assembly has expressly granted to it, together with those necessarily implied from the express grants, and “[a]n act of a municipal corporation, done in an attempt to exercise power not possessed by it, is void.” *Commonwealth ex rel. Vesneski v. Reid*, 108 A. 829, 831 (Pa. 1919) (quoting *Wimer v. Worth Township*, 104 Pa. 317, 320 (1883)).

98. Although the Borough Code vests the powers of the Borough in Council as a general matter, *see* 8 Pa.C.S. § 1202, it withholds from Council those functions it commits by name to another officer, and Council may exercise its powers only “[u]nless otherwise provided,” *id.* § 1006(4).

99. The executive and legislative departments of borough government are accordingly coordinate branches, neither dominant over nor servient to the other. *See Vesneski*, 108 A. at 831 (reasoning that if one office could absorb powers the statute confers on another, “instead of the two being co-ordinate, one would be dominant and the other servient”).

100. For the same reasons, the Borough Code preempts inconsistent local enactments: because a borough’s legislative power exists only by delegation from the General Assembly, a borough enactment that conflicts with the Borough Code — one that forbids what the Code grants, grants what the Code withholds, or reallocates functions the Code assigns — is invalid and of no effect.

101. The Commonwealth Court applied precisely that principle to a borough’s police legislation in *Hoffman*, holding that an ordinance defining the duties of the chief of police “does not restrict [the mayor’s] statutory authority, nor could it.” *Hoffman*, 63 A.3d at 470 (citing *Holt’s Cigar Co. v. City of Philadelphia*, 10 A.3d 902, 907 (Pa. 2011), for the rule that an ordinance may not obstruct the purpose and objective of a statute).

102. Accordingly, even if the IA Policy had been enacted as an ordinance in perfect compliance with every procedural requirement of the Borough Code, it

would be ineffectual to the extent it conflicts with the Code's allocation of authority over the police force: the General Assembly has occupied that subject and resolved it, vesting supervision and operational control in the mayor, 8 Pa.C.S. § 1123.1, and no borough enactment — ordinance or resolution — may reassign it.

103. No provision of the Borough Code empowers Council to designate a person to supervise the police department, to direct the manner in which officers perform their duties, to require officers to answer to Council or its designees, or to displace the Mayor's statutory supervision of the police force.

104. The IA Policy's declaration that final disciplinary authority "rests exclusively with the Council" likewise conflicts with Section 1124 of the Borough Code, which preserves to the Mayor an independent power to suspend police officers for cause.

105. The IA Policy further conflicts with the Borough's own ordinances — which a resolution can neither amend nor repeal, *see* 8 Pa.C.S. § 3301.1(a) (ordinances are amended or repealed "by the enactment of subsequent ordinances") — including Section 1-601 (the Chief, "under the direction of the Mayor," is in charge of the police force) and Part 13 (public complaints against officers are reviewed by an independent board that reports its findings to the Chief and to the Mayor).

106. Resolution 2026-09 and the IA Policy accordingly undertake what neither the Borough Code nor the Borough's ordinances permit: they install a Council-designated supervisor over the Department, subject officers' conduct to

Council's direction, declare Council's disciplinary authority exclusive notwithstanding Section 1124, and reduce the Mayor to a recipient of reports.

107. Resolution 2026-09 and the IA Policy are therefore ultra vires, preempted by and in conflict with the Borough Code, and void and of no force or effect — in whole or, in the alternative, insofar as they (a) provide for any person other than the Mayor, or the Mayor's delegee under Section 1123.1(c), to supervise the police department; (b) require officers to report to, cooperate with, or take direction from Council or its designees; (c) authorize a Council designee to impose administrative leave; and (d) declare Council's disciplinary authority exclusive.

108. To the extent Resolution 2025-12 remains in any respect operative, it is invalid for the same reasons.

109. An actual, present, and justiciable controversy exists between the parties concerning the validity of Resolution 2026-09 and the IA Policy and the allocation of authority over the Department, and a declaration will resolve that controversy.

110. Defendants' conduct as set forth above has been arbitrary, vexatious, and in bad faith, and dilatory, obdurate, and vexatious within the meaning of 42 Pa.C.S. § 2503(7) and (9), entitling Plaintiff to reasonable counsel fees as part of the taxable costs of this matter.

WHEREFORE, Plaintiff Frank W. Peranteau, Sr. respectfully requests that this Honorable Court enter judgment in his favor and against Defendants: (a) declaring that Resolution 2026-09 and the Internal Affairs Policy adopted thereby are ultra

vires, in conflict with the Borough Code, and void and of no force or effect, in whole or in the respects identified above, and that Resolution 2025-12 is invalid to the same extent; (b) declaring that, under 8 Pa.C.S. § 1123.1 and the Borough's ordinances, supervision and operational control of the Bristol Borough Police Department are vested in the Mayor, subject to Council's enumerated statutory powers; (c) permanently enjoining Defendants from implementing or enforcing Resolution 2026-09 and the Internal Affairs Policy and from designating any person to supervise the police department; (d) awarding Plaintiff his reasonable counsel fees pursuant to 42 Pa.C.S. § 2503(7) and (9), together with costs of suit; and (e) granting such other and further relief as the Court deems just and proper.

COUNT II

Declaratory Judgment — 42 Pa.C.S. §§ 7532–7533 — The Countermand and the Direct Orders to Officers Are Void (Plaintiff v. All Defendants)

111. Plaintiff incorporates by reference each of the preceding paragraphs of this Complaint as though the same were fully set forth at length herein.

112. The Borough Code assigns to the Mayor — not to Council or its President — the direction of the chief of police and the police force in the performance of their duties. 8 Pa.C.S. § 1123.1(a)–(b).

113. Neither Council nor its President possesses statutory authority to countermand a directive issued by the Mayor to the chief of police or to a police officer, or to issue operational orders directly to individual officers.

114. Council may act only as a body, by vote of a majority at a meeting, 8 Pa.C.S. § 1006(4), and no single member — including the Council President — may exercise the powers of Council absent lawful delegation.

115. The March 9, 2026 and March 10, 2026 letters, and the actions they announce, are accordingly void on each of two independent grounds: if issued upon a vote or decision of Council, the action exceeded any power the Borough Code confers on Council; and if issued without a vote of Council at a lawful meeting, the action was the act of the Council President alone, without authority.

116. The commands in the March 10, 2026 letter — including the order to appear for an interview at a fixed date, time, and place, and the order to attend a rescheduled examination — direct the time, place, and manner of an officer's performance of duty, a function the Borough Code assigns to the Mayor. 8 Pa.C.S. § 1123.1(b).

117. An actual, present, and justiciable controversy exists concerning the validity of the countermand and the orders issued to Officer Webb and the Chief, and concerning the parties' respective authority; the controversy is continuing, as Council asserts an ongoing power to direct the Department's officers and to countermand the Mayor.

118. This Count seeks no adjudication of any personnel action concerning Officer Webb, and no declaration sought herein would adjudicate Officer Webb's employment rights.

119. Defendants' conduct as set forth above has been arbitrary, vexatious, and in bad faith, and dilatory, obdurate, and vexatious within the meaning of 42 Pa.C.S. § 2503(7) and (9), entitling Plaintiff to reasonable counsel fees as part of the taxable costs of this matter.

WHEREFORE, Plaintiff Frank W. Peranteau, Sr. respectfully requests that this Honorable Court enter judgment in his favor and against Defendants: (a) declaring that neither Council nor its President has authority to countermand directives issued by the Mayor to the chief of police or to police officers, or to issue operational orders directly to police officers; (b) declaring that the March 9, 2026 and March 10, 2026 letters, insofar as they countermand the Mayor's directives and issue orders to Officer Webb, are void and of no effect; (c) permanently enjoining Defendants from issuing orders to, or directing the performance of duties by, the chief of police or any officer of the Department; (d) awarding Plaintiff his reasonable counsel fees pursuant to 42 Pa.C.S. § 2503(7) and (9), together with costs of suit; and (e) granting such other and further relief as the Court deems just and proper.

COUNT III

Declaratory Judgment — 42 Pa.C.S. §§ 7532–7533 — In the Alternative, Resolution 2026-09 Is Invalid Because Its Subject Required an Ordinance (Plaintiff v. All Defendants)

120. Plaintiff incorporates by reference each of the preceding paragraphs of this Complaint as though the same were fully set forth at length herein.

121. Section 3301.1(b) of the Borough Code provides: "Every legislative act of council must be by ordinance." 8 Pa.C.S. § 3301.1(b).

122. Under settled Pennsylvania law, an act of council is legislative in character — and must proceed by ordinance — where it prescribes a permanent rule for the government of the borough of general application, as distinguished from the transaction of current business or the ordinary administration of municipal affairs. *See Eddy v. Ashley Borough*, 281 Pa. 4, 125 A. 308 (1924); *Jones v. Schuylkill Light, Heat & Power Co.*, 51 A. 762 (Pa. 1902) (distinguishing “permanent regulations for the government of the borough” from “the transaction of current business [and] the ordinary administration of municipal affairs”), *quoted in Eddy*, 281 Pa. at 9; *Almy v. Borough of Wilkinsburg*, 416 A.2d 638 (Pa. Cmwlth. 1980) (applying the same test to hold that a resolution reducing the size of a borough police force was “specific action taken in the ordinary administration of municipal affairs” rather than legislative action, while recognizing that Section 1121 requires the establishment of a police department to be accomplished by ordinance).

123. The IA Policy is legislative in character: it is a permanent, standing regulation of general application governing the conduct of every officer of the Department, creating reporting obligations, cooperation obligations enforceable by discipline, investigative structures, and disciplinary allocations, effective immediately and until amended, and expressly superseding and repealing prior policy.

124. The Borough Code’s police provisions confirm as much: the establishment of a police department itself requires an ordinance, 8 Pa.C.S. §

1121(a), and the designation of ranks and of the duties of each rank is a function of that ordinance-making power, *id.* § 1121(a)(3); *see Salopek*, 209 A.2d at 296 n.5 (noting that the council ordinance prescribing police duties was enacted over the mayor’s veto).

125. Council’s own practice confirms it as well: every structural enactment concerning the Department has been an ordinance — Ordinance No. 751 (1971) establishing the Department and placing the Chief under the direction of the Mayor; Ordinances No. 777 and No. 987 amending its classifications; Ordinance No. 1161 (2001) and Ordinance No. 1303 (2014) establishing and amending the Police Civilian Complaint Review Board; and, most recently, Ordinance No. 1378 (2025), by which Council created the position of Lieutenant of Police after a duly advertised public hearing and upon presentment to and approval by the Mayor.

126. An ordinance may be enacted only in compliance with the Borough Code’s procedural requirements, including advertisement of the proposed ordinance, 8 Pa.C.S. § 3301.2; presentation to the mayor for approval or veto, with reconsideration and override only by a majority of all elected council members plus one, *id.* § 3301.3(a); and recording in the borough ordinance book, *id.* § 3301.4.

127. Resolution 2026-09 complied with none of these requirements: it was not advertised, was not presented to the Mayor, and was not recorded as an ordinance.

128. The presentment and approval function is a distinct office of borough government that may not be withdrawn from the mayor by council’s choice of label: the approval authority “is not to be taken from the burgess except by express

legislative enactment,” *Eddy*, 281 Pa. at 8, and the Supreme Court of Pennsylvania has refused effect to borough action of a legislative character taken by resolution without presentment, *see Eddy*, 281 Pa. at 8–10 (enjoining payment under a solicitor’s salary resolution that was never submitted to the burgess); *Wilkes-Barre Connecting Railroad v. Kingston Borough*, 181 A. 564 (Pa. 1935) (holding unenforceable a contract authorized by a resolution never presented to the burgess).

129. By proceeding by resolution, Council deprived the Mayor of his statutory right to approve or disapprove the measure — converting an enactment that, as an ordinance, would have required six of Council’s eight members to override a veto into one adopted by simple majority — and deprived the public of the advertisement and recording through which the Borough Code makes borough legislation knowable.

130. Accordingly, even if the substance of the IA Policy were otherwise within Council’s power — which, as set forth in Count I, it is not — Resolution 2026-09 is invalid for want of the ordinance form, advertisement, presentment, and recording that the Borough Code requires.

131. This Count is pleaded in the alternative to Count I.

132. Defendants’ conduct as set forth above has been arbitrary, vexatious, and in bad faith, and dilatory, obdurate, and vexatious within the meaning of 42 Pa.C.S. § 2503(7) and (9), entitling Plaintiff to reasonable counsel fees as part of the taxable costs of this matter.

WHEREFORE, Plaintiff Frank W. Peranteau, Sr. respectfully requests that this Honorable Court enter judgment in his favor and against Defendants: (a) declaring that the subject of Resolution 2026-09 is legislative in character and could be adopted, if at all, only by ordinance enacted in compliance with 8 Pa.C.S. §§ 3301.1–3301.4; (b) declaring Resolution 2026-09 and the IA Policy invalid and of no force or effect for failure to comply with those requirements; (c) permanently enjoining Defendants from implementing or enforcing Resolution 2026-09 and the IA Policy; (d) awarding Plaintiff his reasonable counsel fees pursuant to 42 Pa.C.S. § 2503(7) and (9), together with costs of suit; and (e) granting such other and further relief as the Court deems just and proper.

COUNT IV

Violation of the Sunshine Act, 65 Pa.C.S. §§ 701–716 — Official Action Taken Outside a Public Meeting (Plaintiff v. All Defendants)

133. Plaintiff incorporates by reference each of the preceding paragraphs of this Complaint as though the same were fully set forth at length herein.

134. Section 704 of the Sunshine Act provides: “Official action and deliberations by a quorum of the members of an agency shall take place at a meeting open to the public unless closed under section 707 (relating to exceptions to open meetings), 708 (relating to executive sessions) or 712 (relating to General Assembly meetings covered).” 65 Pa.C.S. § 704.

135. “Official action” includes the establishment of policy, decisions on agency business, and votes taken on any motion, proposal, resolution, rule, regulation,

ordinance, report or order; “deliberation” is the discussion of agency business held for the purpose of making a decision; and “agency business” includes the framing, preparation, making or enactment of policy and the adjudication of rights, duties and responsibilities. 65 Pa.C.S. § 703.

136. While Section 708(a) permits an agency to hold an executive session for enumerated purposes — including certain discussions of matters involving specific employees, consultation with counsel, and matters related to the conduct of investigations — Section 708(c) commands that “[o]fficial action on discussions held pursuant to subsection (a) shall be taken at an open meeting,” and that no “executive session be used as a subterfuge to defeat the purposes of section 704.” 65 Pa.C.S. § 708(c).

137. Plaintiff does not contend that Council was forbidden to discuss personnel matters in executive session on March 9, 2026.

138. The violation is that Council deliberated, decided, and acted there.

139. Upon information and belief, at the executive session held before the March 9, 2026 public meeting, a quorum of Council deliberated upon and decided — by vote or by collective decision — to countermand the Mayor’s March 8, 2026 directives and to issue the orders subsequently communicated in the March 9 and March 10, 2026 letters.

140. That decision was official action: a decision on agency business, and the establishment of the Borough’s policy regarding the supervision and direction of its police force.

141. No official action countermanding the Mayor's directives or authorizing the March 9 and March 10, 2026 letters was taken at any open meeting, on March 9, 2026 or at any time thereafter.

142. Council's conduct accordingly violated Sections 704 and 708(c) of the Sunshine Act.

143. Defendants' violation was not inadvertent. Rather, Defendants acted with the improper purpose of circumventing public scrutiny and public disclosure of their deliberations and decisions concerning the supervision of the Borough's police force — the precise ends the Sunshine Act exists to secure.

144. Defendants took their action in secret, announced it only in correspondence — correspondence captioned "Confidential" — and coupled the announcement with an instruction that the Mayor "keep all this information confidential," thereby seeking to conceal from the public both the action and the process by which it was taken.

145. Upon information and belief, Defendants' actions were motivated by hostility toward Officer Webb arising from his complaints of misconduct within the Department, and toward the Mayor, whose exercise of the statutory duties reposed in his office stood in the way of the unilateral control over the Department that Council sought, and Defendants employed the executive session to advance those ends outside public view.

146. Defendants' conduct followed the same pattern by which Council had retained Campbell Durrant, P.C.: action first taken and implemented outside any public meeting, with a public vote, if any, only after the fact.

147. Defendants acted willfully or with wanton disregard of the requirements of the Sunshine Act.

148. Council's action at the March 9, 2026 executive session was first disclosed to the Mayor on March 10, 2026, when he received the letter dated March 9, 2026.

149. The Mayor neither knew nor could have known of that action before March 10, 2026.

150. This legal challenge was commenced on the thirtieth day after that discovery, and within one year of the March 9, 2026 meeting, by the writ of summons filed April 9, 2026. *See* 65 Pa.C.S. § 713; *Tom Mistick & Sons, Inc. v. City of Pittsburgh*, 567 A.2d 1107 (Pa. Cmwlth. 1989) (holding that a timely praecipe for a writ of summons institutes a "legal challenge" under the Act).

151. Under Section 713, the Court may enjoin any challenged action until a judicial determination of the legality of the meeting at which it was adopted, and, should it determine that the meeting did not meet the requirements of the Act, may in its discretion find that any or all official action taken at the meeting is invalid. 65 Pa.C.S. § 713.

152. Under Section 714.1, if the Court determines that an agency willfully or with wanton disregard violated the Act, in whole or in part, the Court shall award

the prevailing party reasonable attorney fees and costs of litigation. 65 Pa.C.S. § 714.1.

WHEREFORE, Plaintiff Frank W. Peranteau, Sr. respectfully requests that this Honorable Court enter judgment in his favor and against Defendants: (a) declaring that Defendants violated 65 Pa.C.S. §§ 704 and 708(c) by deliberating upon and deciding agency business at the March 9, 2026 executive session and by taking official action outside an open meeting; (b) invalidating, pursuant to 65 Pa.C.S. § 713, the countermand of the Mayor's directives and the orders announced in the March 9 and March 10, 2026 letters; (c) enjoining Defendants from deliberating upon or taking official action on agency business other than at an open public meeting in compliance with the Act; (d) awarding Plaintiff reasonable attorney fees and costs of litigation pursuant to 65 Pa.C.S. § 714.1 and 42 Pa.C.S. § 2503(7); and (e) granting such other and further relief as the Court deems just and proper.

Dated: July 28, 2026

Respectfully submitted,

/s/ Shohin H. Vance

Shohin H. Vance (No. 323551)
SAXTON & STUMP, LLC
100 Deerfield Lane, Suite 240
Malvern, PA 19355
(484) 328-8512 (Phone)
svance@saxtonstump.com

*Attorneys for Plaintiff
Frank W. Peranteau, Sr.*

VERIFICATION

I, Frank W. Peranteau, Sr., verify that I am the Plaintiff in the foregoing action; that the averments of fact set forth in the foregoing Complaint are true and correct upon my personal knowledge or information and belief; and that, as to averments made upon information and belief, I believe them to be true. I understand that this Verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: Jul 27, 2026, 2026

Frank W Peranteau SR
Frank W Peranteau SR (Jul 27, 2026 19:45:23 EDT)
Frank W. Peranteau, Sr.

CERTIFICATE OF COMPLIANCE

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

Dated: July 28, 2026

/s/ Shohin H. Vance
Shohin H. Vance, Esq.
Attorney I.D. No. 323551

EXHIBITS

The following writings, upon which this Complaint relies in part, are attached pursuant to Pa.R.C.P. 1019(i):

- A. Resolution No. 2026-09 (Mar. 24, 2026), with Exhibit “A” (Internal Affairs Policy).
- B. Letter of Borough Manager James J. Dillon to Officer Webb (Jan. 30, 2026).
- C. Letter of Council President Ralph DiGuiseppe to Officer Webb (Feb. 11, 2026).
- D. Letter of Council President Ralph DiGuiseppe to District Attorney Joseph Khan (Feb. 25, 2026).
- E. Directive of Mayor Frank W. Peranteau, Sr. to Chief Joseph Moors (Mar. 8, 2026).
- F. Directive of Mayor Frank W. Peranteau, Sr. to Officer Ritchie Webb, Jr. (Mar. 8, 2026).
- G. Letter of Council President Ralph DiGuiseppe to Mayor Peranteau (Mar. 9, 2026).
- H. Letter of Council President Ralph DiGuiseppe to Officer Webb, “RE: Orders to Cooperate” (Mar. 10, 2026).
- I. Letter of Council President Ralph DiGuiseppe to Mayor Peranteau, “RE: Confidential Borough Council Investigation” (Mar. 23, 2026).
- J. Borough of Bristol Ordinance No. 1378 (2025) (establishing the position of Lieutenant of Police).

EXHIBIT A

Resolution No. 2026-09 (Mar. 24, 2026), with Exhibit "A" (Internal Affairs Policy)

RESOLUTION NO. 2026- 09

**RESOLUTION ADOPTING THE POLICE DEPARTMENT'S
REVISED INTERNAL AFFAIRS POLICY**

WHEREAS, the Council of the Borough of Bristol recognizes the public's need for police accountability, a clear chain of command, and fair procedures to conduct impartial administrative investigations into allegations of police misconduct and/or neglect of duty:

NOW BE IT RESOLVED, the Council of the Borough of Bristol adopts the Police Department's revised Internal Affairs Policy, which is effective immediately. A true and correct copy of the Internal Affairs Policy is attached hereto and incorporated into this Resolution as Exhibit "A". The Policy shall supersede all prior Police Department policies that pertain to internal affairs investigations, which are hereby repealed.

RESOLVED, at the duly convened meeting of the Bristol Borough Council conducted on this 24th day of March A.D., 2026.

BRISTOL BOROUGH COUNCIL


Ralph Di Guiseppe
Council President

Attest:


James Dillon
Bristol Borough Manager

BRISTOL BOROUGH POLICE DEPARTMENT

INTERNAL AFFAIRS POLICY

I. PURPOSE

The purpose of this policy is to establish fair and impartial procedures for conducting and documenting administrative investigations into the conduct of Bristol Borough's police officers ("officers"). The goals of the policy are to enhance the integrity of the Department, to improve the quality of police services, to protect the employment and due process rights of officers and to assure the public that complaints of police misconduct and/or neglect are properly addressed.

II. POLICY

It is the policy of the Borough to investigate all complaints against officers, including anonymous complaints, and all allegations of employee misconduct, whether received from the public or employees or officials of the Borough. The Borough, through its designees, will promptly and thoroughly investigate all complaints against members of the Department pursuant to this policy and will take appropriate action when necessary.

III. SOURCES OF COMPLAINTS AGAINST BOROUGH POLICE OFFICERS

Complaints about the conduct of an officer may arise from Borough officials, employees or from the public. Every such allegation, whether expressed verbally, in writing or anonymously, shall be investigated in accordance with the procedures set forth in this policy.

IV. RECORD OF COMPLAINTS

All complaints will be recorded, assigned an internal affairs report number and maintained in a secure location by the person(s) designated by Council to conduct an investigation. This record shall contain the following information: name of complainant, name of accused, date received, name of the Borough employee who received the complaint, type of complaint, case number, and final disposition. This record shall be kept by the investigator in a secure location and subject to review by the Council and by the Mayor.

V. DUE PROCESS RIGHTS OF THE ACCUSED OFFICER

The Borough recognizes and will protect the due process rights of officers accused of committing misconduct and/or neglect of duty and will ensure that the internal affairs investigation is conducted in accordance with the Constitutions of the United States and Pennsylvania as well as applicable state and federal law.

VI. PROCEDURE FOR THE INVESTIGATION OF COMPLAINTS

A. Notification, Classification and Documentation of Complaints

1. Any officer who receives a complaint against himself or herself or against another officer shall immediately report the complaint to his or her immediate supervisor or to the Chief of Police or to the Chief's designee or to the person designated by Council to supervise the police department.
2. Any supervisory officer who receives a complaint against an officer shall immediately report the complaint to the Chief of Police or to the Chief's designee or to the person designated by Council to supervise the police department.
3. In the event the Chief of Police or person designated to supervise the police department is the target of the investigation, then the complaint shall be promptly reported to the Mayor and to the Council.
4. In the event a member of the public or a Borough employee requests an officer how to file a complaint about police conduct, that officer shall inform the person that a complaint may be filed during business hours at the Borough Hall or the Police Department on a written complaint form or electronically as designated by Council.
5. In the event a member of the public or a Borough employee initiates a complaint against an officer, the complainant will be provided with a "Citizen Complaint Form," which is attached to this policy and incorporated herein as Attachment "A."
6. Upon the receipt of a complaint, the Chief or the Chief's designee or person designated by Council to supervise the department will immediately send a letter to the complainant, if known, acknowledging receipt of the complaint.
7. In the event a complaint against an officer contains allegations of a crime, workplace harassment or where the complaint contains allegations, which could result in the discharge, suspension or demotion of an officer, the Chief of Police or the Chief's designee or person designated by Council to supervise the police department shall promptly notify the Mayor and Council of the complaint.
 - a. For purposes of this section, prior to the start of the investigation, Council shall determine whether the Chief or the person designated to supervise the police department should not conduct the investigation for reasons that include, but are not limited to, a

conflict of interest; in such case, Council reserves its authority to designate a qualified person to conduct the investigation consistent with the terms of this policy.

- b. All officers are obligated to cooperate in internal affairs investigations as required by Council, which includes providing truthful responses to inquiries made by the Council's designated investigator.
8. The Council shall ensure that its adjudicatory function is kept separate from the investigatory and prosecutorial functions during the course of the internal affairs investigation
9. Complaints against officers that do not fall within this policy shall be investigated and documented by the Chief of Police or the Chief's designee or the person designated by Council to supervise the police department, in accordance with the procedures set forth herein. Such information shall be subject to review by Council at any time.
10. All officers who are subject to discipline that rises to the level of **discharge, suspension or demotion in rank** will be advised of the potential disciplinary charges and provided with an opportunity to respond to the charges before final action is taken. Officers may request union representation during interviews that could potentially result in the imposition of discipline.

B. Suspicion of Criminal Activity

In the event an officer's conduct that gives rise to an internal affairs investigation may constitute criminal activity, the following process shall be followed.

1. The Chief of Police or person designated by Council to supervise the police department shall promptly notify the County District Attorney's Office for the purpose of determining which law enforcement agency will conduct the criminal investigation;
2. The Borough will ensure that the Borough's administrative internal affairs investigation is conducted separately from the criminal investigation.

C. Temporary Administrative Leave of Accused Officer

The Chief of Police or person designated to supervise the police department may immediately impose a temporary paid administrative leave of a police officer when the s/he reasonably believes that: 1) the officer is unfit for duty, or 2) the action is necessary to protect the health, safety or welfare of a Borough employee or the public. Such action shall not be deemed to constitute disciplinary action against the accused officer.

VII. AUTHORITY TO IMPOSE DISCIPLINE

Authority to impose final disciplinary action against a Borough police officer that rises to the level of suspension, demotion or termination rests exclusively with the Council.

VIII. FINAL ADMINISTRATIVE ACTION & OFFICER' RIGHTS OF APPEAL

Upon the completion of the investigation of matters referred to in Section VI.A.7., the Borough Council shall render one of the following conclusions:

1. **Sustained:** The evidence is sufficient to prove the allegations.
2. **Not Sustained:** There is insufficient evidence to either prove or disprove the allegations.
3. **Exonerated:** The incident occurred, but was lawful or proper.
4. **Unfounded:** The allegation is false or is not factual.

Borough police officers may exercise their rights of appeal of final administrative determinations pursuant to federal and state law and the terms of the current collective bargaining agreement.

XII. DISTRIBUTION

This policy shall be issued to the Mayor and all Borough police officers.

XIII. REVIEW

This policy may be reviewed periodically and amended as authorized by the Council.

END OF DOCUMENT

BRISTOL BOROUGH POLICE DEPARTMENT

CITIZEN COMPLAINT FORM

Complainant's Name _____ Home Phone _____

Address _____ Bus. Phone _____

Witnesses Name _____ Home Phone _____

Name of Officer Receiving Complaint _____ Date/Time _____

Nature of Complaint

Type of
Incident _____

Location _____

Date/Time _____

Synopsis _____

Additional page(s) _____ yes, _____ no

Officer/Personnel Involved _____

Statements "Under Penalty" – A person commits a misdemeanor of the third degree, if he/she makes a written false statement which he/she does not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable.

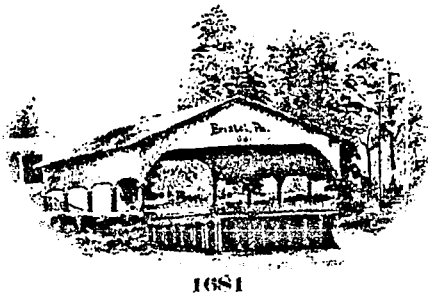
Signature of Complainant

Date

(Attachment A)

EXHIBIT B

Letter of Borough Manager James J. Dillon to Officer Webb (Jan. 30, 2026)



HISTORIC BRISTOL BOROUGH

250 Pond Street, Bristol, PA 19007
Tel: 215-788-3828 • Fax: 215-788-5366
Website: www.bristolborough.com

January 30, 2026

HAND DELIVERED

Ritchie Webb

[Redacted]
Bristol, PA 19007

Re: Return to Service

Dear Officer Webb:

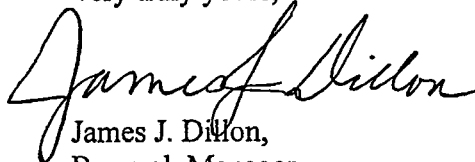
The Borough acknowledges that you have been approved to return to work by your medical provider. However, the Borough requires an independent medical examination of your fitness for duty, since as a police officer, you have as a primary responsibility the protection of the public. The Borough hopes that this examination will not be inordinately delayed. The independent medical examination will be at the Borough expense, and upon receipt of dates for your appointment, the Borough will notify you of the time, location and physician who will be conducting the examination.

You will be paid in full your base salary, any PTO time accumulated, and you will maintain all of the benefits afforded to you pursuant to the Collective Bargaining Agreement between the Borough and the Police Benevolent Association.

The Borough will be sending someone to your home to take possession of your service revolver because you are not presently on duty, and the service revolver should be returned to the police department.

If you have any questions, please advise.

Very truly yours,


James J. Dillon,
Borough Manager

JJD/sab

cc: Chief Joseph Moors
Mayor Frank Peranteau
File Copy

EXHIBIT C

Letter of Council President Ralph DiGuseppe to Officer Webb (Feb. 11, 2026)



HISTORIC BRISTOL BOROUGH

250 Pond Street, Bristol, PA 19007
Tel: 215-788-3828 • Fax: 215-788-5366
Website: www.bristolborough.com

February 11, 2026

Officer Ritchie Webb

[REDACTED]
Bristol, Pa 19007

Dear Officer Webb:

Please accept this response to your e-mail placing the Mayor and Borough Council on notice of your claims of a "continuing pattern of retaliation, obstruction and abuse of authority in connection with my medical clearance and attempted return to duty" and alleged adverse treatment resulting from your reports of "serious misconduct within the Bristol Police Department". Investigation of all complaints contained in your e-mail has been assigned to outside labor and employment counsel at the firm of Campbell Durrant, P.C.

You will be contacted by the assigned investigating attorney from Campbell Durrant in the near future and you and/or your attorney can direct any questions regarding this investigation to Campbell Durrant attorney Patrick J. Harvey, Esq at pharvey@cdblaw.com <<mailto:pharvey@cdblaw.com>> or at 610-227-2595.

The Borough is also in the process of scheduling a fitness for duty return to work exam in relation to your recent clearance to return to work by your treating therapist. The Chief will communicate with you regarding scheduling this exam with Dr. Andrew Wolanin and your provision of your treatment records to Dr. Wolanin. Campbell Durrant has been hired as the Borough's labor and employment counsel and any questions regarding this fitness for duty exam can be directed by you or your attorney(s) to Mr. Harvey. Mr. Harvey informs us that fitness for duty exams are not permitted to be recorded and are not attended by attorneys. Any questions regarding these issues should be directed to Mr. Harvey.

Sincerely,

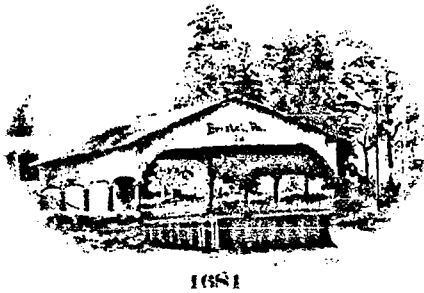
Ralph DiGuiseppe
Ralph DiGuiseppe
Council President

RD/sb

cc: Borough Council
Mayor Frank Peranteau Sr.
Jeff Garton, Borough Solicitor
Patrick Harvey, CDB Law, Special Council
James J. Dillon, Borough Manager
Chief Moors, Borough Police Chief
File Copy

EXHIBIT D

Letter of Council President Ralph DiGuiseppe to District Attorney Joseph Khan
(Feb. 25, 2026)



HISTORIC BRISTOL BOROUGH

250 Pond Street, Bristol, PA 19007
Tel: 215-788-3828 • Fax: 215-788-5366
Website: www.bristolborough.com

February 25, 2026

Honorable Joseph Khan, Esq.,
District Attorney
Bucks Justice Center
100 N. Main Street
Doylestown, PA 18901

RE: Forwarding Complaint of Officer Ritchie Webb

Dear District Attorney Kahn,

I am the President of Bristol Borough Council and have attached a February 7, 2026 e-mail complaint from Borough police officer Ritchie Webb which alleges civil "obstruction, retaliation and abuse of authority" along with criminal conduct by the Borough's Police Chief [REDACTED] and unnamed Borough police officers who allegedly coerced Borough residents to vote for the former Borough Mayor who is my son.

The Borough writes to report these criminal allegations raised by Officer Webb and encourages your office to perform an investigation of these allegations. The Borough investigates all reported crimes but since Officer Webb's allegations are against Borough police officers we believe that any criminal investigation should be performed by your office. The Borough has assigned the investigation of the non-criminal allegations to the Borough's outside labor counsel. The Borough remains available to fully cooperate with your office's investigators regarding the attached criminal allegations.

Sincerely,


Ralph DiGuiseppe
Borough Council President

RD/sb

cc: Borough Council (enc)
Mayor Frank Peranteau (enc)
Patrick Harvey, Esq. (enc)
Jeffrey Garton, Borough Solicitor (enc)
James Dillon, Borough Manager (enc)
File Copy (enc)

EXHIBIT E

Directive of Mayor Frank W. Peranteau, Sr. to Chief Joseph Moors (Mar. 8, 2026)



Frank W. Peranteau, Sr.

Office of the Mayor

HISTORIC BRISTOL BOROUGH

250 Pond Street, Bristol, PA 19007

215-788-3828 x 25

Email: fperanteau@bristolboro.com

March 8, 2026

Chief Joseph Moors
Bristol Borough Police Department
250 Pond Street
Bristol, PA, 19007

Effective immediately I am ordering you not to contact Officer Webb regarding the Independent Investigation commissioned by Borough Council, or his Independent Medical Examination. I have ordered Officer Webb not to cooperate in the independent investigation. Since Council President requested District Attorney Joseph Khan to investigate the allegations made by Officer Webb I believe it takes precedent. The district attorney's investigation will ensure an unbiased transparent conclusion.

Going forward all information and correspondence regarding the Independent Medical Examination for Officer Webb with Dr. Wolanin will be managed through my office. So please forward any information to me. Your cooperation in this matter is expected.

If you have any questions or concerns, please feel free to contact me.

Sincerely,

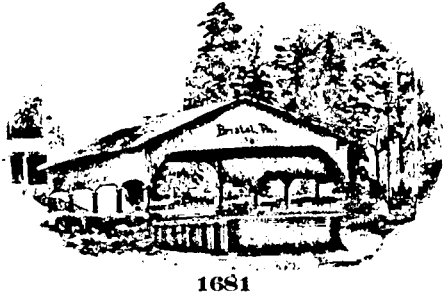
A handwritten signature in black ink, appearing to read 'Frank W. Peranteau, Sr.'.

Frank W. Peranteau, Sr.

Mayor

EXHIBIT F

Directive of Mayor Frank W. Peranteau, Sr. to Officer Ritchie Webb, Jr. (Mar. 8, 2026)



Frank W. Peranteau, Sr.
Office of the Mayor
HISTORIC BRISTOL BOROUGH

250 Pond Street, Bristol, PA 19007

215-788-3828 x 25

Email: fperanteau@bristolboro.com

March 8, 2026

Officer Ritchie Webb



Bristol, PA 19007

Officer Webb:

After careful consideration regarding the ongoing requests for you to cooperate with the independent investigation that the Borough has commissioned and by virtue of my authority as Mayor, I am ordering you not to take part in the investigation. Since Council President Ralph Diguiseppe also requested that Bucks County District Attorney Joseph Khan investigate the allegations that you alleged, the District Attorney's investigation takes precedent over the other investigation. I am ordering you to cooperate with the district attorney in their investigation.

Part of my concern about the independent investigation is that it is flawed by having the subject of the complaints you alleged continue to interact with you. I advised Mr. Harvey of my concern during a phone conversation with him. Having the District Attorney's office investigate your claims would avoid the appearance of any bias by either party. I will be notifying Chief Moors that moving forward he is to have no contact with you regarding this matter and all contact will go through my office. At the same time, I will notify Council President Diguiseppe and Mr. Patrick Harvey of my decision.

On the matter of your Independent Medical Examination, I expect you to cooperate and appear for your exam and provide Dr. Wolanin with all pertinent information regarding your treatment pertaining to the horrific train incident that took the lives of three Bristol residents.

Your cooperation moving forward will is expected.

Sincerely,


Frank W. Peranteau, Sr.
Mayor

EXHIBIT G

Letter of Council President Ralph DiGuiseppe to Mayor Peranteau (Mar. 9, 2026)



HISTORIC BRISTOL BOROUGH

250 Pond Street, Bristol, PA 19007
Tel: 215-788-3828 • Fax: 215-788-5366
Website: www.bristolborough.com

March 9, 2026

Sent Regular Mail and E-mail
fperanteau@bristolboro.com

Mayor Frank W. Peranteau, Sr.
Bristol Borough
250 Pond Street
Bristol, PA 19007

RE: Confidential Borough Council Investigation

Dear Mayor Peranteau:

I write on behalf of Borough Council to correct your March 8, 2026 letter and countermand your orders to Officer Webb and Chief Joseph Moors. Borough Council has the ultimate authority and is the final decision maker with exclusive authority to assign the Chief's duties and to decide how discipline is to be imposed in the event of police misconduct. Borough Council's ultimate authority was outlined in the Supreme Court of Pennsylvania case of Salopek v Albert which established that Borough Council has the ultimate authority regarding assigning the Chief's duties and discipline and that the Mayor's powers are limited to supervising the Chief in his execution of the duties that are assigned by Council.

Pennsylvania courts have consistently established that Borough Council has the primary responsibility and discretion to determine whether or not and how a police officer should be disciplined. Borough Council has assigned an investigation of multiple issues involving and raised by Officer Ritchie Webb to outside labor counsel, Patrick J. Harvey, Esq. of the firm of Campbell Durrant. The reasons for the assignment of this investigation to outside counsel are listed below.

On February 7, 2026 Officer Webb forwarded an e-mail to you in which he placed you and Borough Council on notice of his claims of a continuing pattern of retaliation, obstruction and abuse of authority including claims of serious misconduct within the Bristol Police Department including criminal misconduct. Since this claim contained allegations of criminal conduct it was referred to the Bucks County District Attorney's office. It was also referred to outside labor counsel, Mr. Harvey since the February 7, 2026 complaint alleged multiple issues which require internal noncriminal investigation. The complaint was also referred to the Borough's insurance company. Your direction that the Borough wait for the completion of any District Attorney's investigation is rejected since the District Attorney only has authority to perform a criminal investigation.

The Borough has also assigned to Mr. Harvey's office the investigation of multiple other issues involving Officer Webb. Officer Webb has been repeatedly insubordinate in disobeying directives and orders issued to him by the Chief and has failed to appear for a scheduled independent medical examination, a scheduled fitness for duty examination and a March 3, 2026 interview with labor counsel regarding his February 7, 2026 complaints. All these cancellations have resulted in needless cancellation fees from the medical professionals and legal fees due to Officer Webb's failure to appear as ordered.

Mr. Harvey's office is further investigating allegations of possible criminal and civil violations regarding Officer Ritchie Webb seeking alleged special treatment regarding Bristol Borough traffic tickets and requesting special favors in the handling of five parking tickets. This investigation includes allegations that you Mr. Mayor intervened inappropriately on behalf of Officer Ritchie Webb with Court authorities.

Mr. Harvey's office has finally been assigned the investigation of Officer Ritchie Webb who was ordered to appear for an interview with Mr. Harvey at Borough Hall to investigate his February 7, 2026 complaints and Officer Webb instead was instead inappropriately representing and trying to intervene on behalf of his neighbor in Bristol Traffic Court on March 3, 2026.

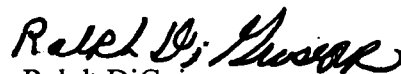
The investigation of Officer Webb's complaints and the serious above alleged misconduct has been assigned to outside counsel since Officer Webb has accused his fellow officers of retaliation, misconduct and crimes including Chief Joe Moors. Since the Police Department in this situation cannot investigate this matter outside labor counsel has been assigned this investigation.

The investigation of the other potential misconduct involving Officer Webb's alleged inappropriate and possibly criminal conduct in attempting to ask for inappropriate favor regarding the Court handling of his five parking tickets and your alleged involvement in assisting him have been assigned to outside counsel for investigation since Borough Council believes it would not be appropriate for our police department to conduct this investigation especially in light of Mr. Webb's claims made against many department officers including the Chief.

Borough Council is requesting that you recuse yourself from all Officer Ritchie Webb matters including his examinations and investigations, since you have been accused of inappropriate conduct regarding Officer Webb's tickets and are subject to investigation. Council also requests that you withdraw in writing your March 6, 2026 orders to Webb and Chief Moors. Finally, Council requests that you have no contact with Officer Webb until all of the above investigations are completed. Borough Council encourages you to fully cooperate with the investigation being conducted by Mr. Harvey's office. Mr. Harvey's office will contact you in the near future to schedule your interview.

Council instructs you to keep all of this information confidential and to contact Borough Council President or labor counsel, Patrick Harvey if you have any questions regarding the investigations.

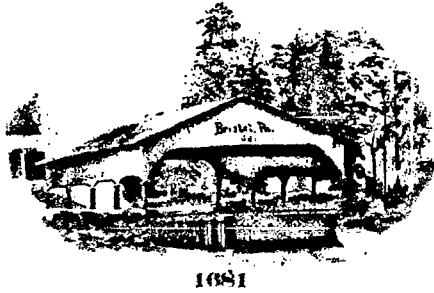
Sincerely,


Ralph DiGuiseppe
Council President

cc: Patrick J. Harvey, Esq., Campbell Durrant, P.C.
Jeffrey P. Garton, Borough Solicitor
James J. Dillon, Borough Manager
Police Chief Moors
File Copy

EXHIBIT H

Letter of Council President Ralph DiGuiseppe to Officer Webb, "RE: Orders to Cooperate" (Mar. 10, 2026)



HISTORIC BRISTOL BOROUGH

250 Pond Street, Bristol, PA 19007
Tel: 215-788-3828 • Fax: 215-788-5366
Website: www.bristolborough.com

March 10, 2026

Officer Ritchie Webb
[Redacted]
Bristol, Pa 19007

RE: Orders to Cooperate

Dear Officer Webb:

Please be advised that Borough Council has countermanded the orders issued to you by Mayor Frank Peranteau, Sr., on March 8, 2026. You are ordered to fully cooperate with your interview with Borough labor counsel regarding the investigation of your February 7, 2026 complaints and a disciplinary investigation involving your representing your neighbor in Bristol Borough traffic court on March 3, 2026 when you were ordered to appear for an interview regarding your February 7, 2026 complaints with labor counsel at 10 a.m. on that date. You are further ordered to cooperate with the investigation regarding alleged serial insubordination and disobedience of orders from Chief Moors. You are finally ordered to fully cooperate with the investigation of inappropriate and potentially criminal conduct regarding your attempt to influence Bristol Traffic Court and ask for favorable treatment related to five tickets that were issued to you.

All of the above matters will be investigated by the Borough's outside labor counsel, Campbell Durrant. You are ordered to appear on Monday, March 30, 2026 at Borough Hall at 10 a.m. so that outside labor counsel can interview you regarding your February 7, 2026 complaints, your alleged insubordination, alleged inappropriate conduct regarding your five tickets and your inappropriate representation of your neighbor at Bristol Traffic Court. You are further ordered to attend the rescheduled Fitness for Duty exam with Dr. Wolanin which is being rescheduled.

You have a right to bring a union representative to the interviews with labor counsel. It is your responsibility to contact the union and obtain a representative if you care to do so. The fitness for duty doctor, Dr. Wolanin, does not permit individuals he is examining to record the examination or to bring anyone with them as a representative. We will notify you of Dr. Wolanin's new exam date as soon as it is provided.

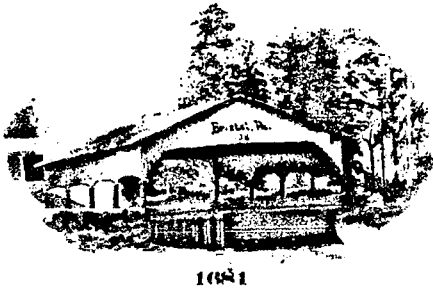
Sincerely,

Ralph DiGuiseppe
Borough Council President

cc: Patrick J. Harvey, Esq., Campbell Durrant, P.C.
Jeffrey P. Garton, Borough Solicitor
Mayor Frank W. Peranteau, Sr.
James J. Dillon, Borough Manager
Police Chief Moors
File Copy

EXHIBIT I

Letter of Council President Ralph DiGuseppe to Mayor Peranteau, "RE:
Confidential Borough Council Investigation" (Mar. 23, 2026)



HISTORIC BRISTOL BOROUGH

250 Pond Street, Bristol, PA 19007
Tel: 215-788-3828 • Fax: 215-788-5366
Website: www.bristolborough.com

March 23, 2026

Sent Regular Mail and E-mail
fperanteau@bristolboro.com

Mayor Frank W. Peranteau, Sr.
Bristol Borough
250 Pond Street
Bristol, PA 19007

RE: Confidential Borough Council Investigation

Dear Mayor Peranteau:

Please accept this letter to renew Borough Council's request that you recuse yourself from all matters involving Ritchie Webb and issue a letter withdrawing your March 6th orders to Officer Webb and Chief Moors. This request is made due to a complaint that has been made that you took inappropriate action in attempting to intervene on Officer Webb's behalf with Court authorities regarding Webb's traffic tickets. You are now part of the Webb misconduct investigation, and it is a conflict of interest for you to have any involvement with Webb or you to be effectively shutting down the investigation by ordering Webb not to cooperate with independent outside counsel who are investigating both Webb's complaints and Webb's alleged misconduct.

You are on notice that you are being investigated as part of the Webb investigation. You are further placed on notice that you are acting outside your powers as Mayor and have a conflict of interest in attempting to shut down the Webb investigation. You are further placed on notice that Council will notify the Borough's insurance carrier that your conflicted outside of your powers actions voids any insurance coverage provided to you as Mayor under the Borough's insurance policies.

The Borough has a duty to investigate Officer Webb's complaints and the investigation has been delayed by your March 6th inappropriate and outside your duties orders. On February 7, 2026 Officer Webb forwarded an e-mail to you in which he placed you and Borough Council on notice of his claims of a continuing pattern of retaliation, obstruction and abuse of authority including claims of serious misconduct within the Bristol Police Department including criminal misconduct.

Since this claim contained allegations of criminal conduct it was referred to the Bucks County District Attorney's office. It was also referred to outside labor counsel, Mr. Harvey since the February 7, 2026 complaint alleged multiple issues which require internal noncriminal

investigation. The complaint was also referred to the Borough's insurance company. Your direction that the Borough wait for the completion of any District Attorney's investigation is rejected since the District Attorney only has authority to perform a criminal investigation, may not even perform a criminal investigation and the Borough has the duty to promptly investigate all complaints

Council also notes that Officer Webb as of March 16 issued a "Public Statement" claiming misconduct by the Borough in handling his complaints and promises to go live soon on social media. Your conflicted actions outside of your powers is not only causing potential liability by also bringing undeserved disrepute upon the Borough. Should you not recuse yourself and rescind your March 6 orders Council may be forced to address your conflicted inappropriate actions at a public meeting.

Borough Council places you on notice that it will also be contacting the Borough's insurance carrier, advising the carrier of how your inappropriate actions have delayed the investigation and requesting that should any liability result from the complaints the Borough is attempting to investigate that you not receive any insurance coverage due to your acting outside of your duties, contrary to the Borough's interest and while totally conflicted.

Borough Council is again requesting that you immediately recuse yourself in writing from all Officer Ritchie Webb matters including his examinations and investigations, since you have been accused of inappropriate conduct regarding Officer Webb's tickets and are subject to investigation. Council also requests that you withdraw in writing your March 6, 2026 orders to Webb and Chief Moors. Finally, Council requests that you have no contact with Officer Webb until all of the above investigations are completed. Borough Council encourages you to fully cooperate with the investigation being conducted by Mr. Harvey's office. Mr. Harvey's office will contact you in the near future to schedule your interview.

Council instructs you to keep all this information confidential and to contact Borough Council President or labor counsel, Patrick Harvey if you have any questions.

Sincerely,



Ralph Di Guiseppe
Council President

RD/sab

cc: Patrick J. Harvey, Esq., Campbell Durrant, P.C.
Jeffrey P. Garton, Borough Solicitor
James J. Dillon, Borough Manager
Police Chief Moors
File Copy

EXHIBIT J

Borough of Bristol Ordinance No. 1378 (2025) (establishing the position of
Lieutenant of Police)

BRISTOL BOROUGH
ORDINANCE NO. 1378

**AN ORDINANCE OF THE BOROUGH OF BRISTOL, BUCKS COUNTY,
PENNSYLVANIA, AMENDING THE PROVISIONS OF CHAPTER 1,
ADMINISTRATION AND GOVERNMENT, PART 6, POLICE DEPARTMENT,
RELATED TO THE ESTABLISHMENT OF THE POSITION OF LIEUTENANT IN THE
POLICE DEPARTMENT, WHICH SAID AMENDMENT IS TO THE BRISTOL
BOROUGH CODE OF ORDINANCES**

WHEREAS, the Pennsylvania Borough Code at 8 Pa.C.S.A. §101 *et seq.*, authorizes the Borough Council of the Borough of Bristol ("Borough Council") to make and adopt ordinances that are consistent with the Constitution and laws of the Commonwealth when necessary for the proper management, care and control of the Borough and the maintenance of the peace, good government, and health and welfare of the Borough and its citizens; and

WHEREAS, this Ordinance is intended to amend the provisions of Chapter 1, Administration and Government, Part 6, Police Department, by restating portions of said provisions, and establishing the position of Lieutenant of Police; and

WHEREAS, Borough Council, after due consideration of the proposed Ordinance at a duly advertised public hearing, has determined that the health, safety, and general welfare of the residents of Bristol Borough will be served by this Ordinance amendment.

NOW, THEREFORE, BE IT ENACTED AND ORDAINED by the Borough Council of the Borough of Bristol, Bucks County, Pennsylvania, and it is hereby amended as follows:

Section 1. The Bristol Borough Code of Ordinances is hereby amended as follows:

1. Chapter 1, Administration and Government, Part 6, Police Department, §1-601 and §1-602, Police Department Established; Chief of Police and Subordinate Classifications in Police Department, shall be amended so as to delete same and replace it with the following:

§1-601 Police Department Established; Chief of Police. The Police Department is hereby established for the Borough of Bristol. The Chief of Police shall be the chief executive of the Police Department, and he shall be in charge of the police force and have supervision over its members in the exercise of their powers, duties and authority, recognizing in accordance with the provisions of the Pennsylvania Borough Code.

§1-602 Subordinate Classifications in Police Department.

1. Subordinate to the Chief of Police in the Police Department there shall exist the following classifications:

A. Lieutenant, in the number as Borough Council may from time to time authorize. The Lieutenant shall be the second in command in the Police Department and shall act in place of the Chief of Police, in the absence or incapacity of the Chief of Police.

B. Sergeants, in the number as Borough Council may from time to time authorize. In the absence of the Chief of Police and the Lieutenant of Police, the Sergeant, Senior in time of service, in the position of Sergeant, shall act in the place of the Chief of Police, and Lieutenant of Police.

C. Corporals in the number as Borough Council may from time to time authorize. Corporals shall be in charge of shifts where there are no other supervisory personnel assigned at the time.

D. Patrolmen in such number as Borough Council may from time to time authorize. One patrolman shall serve in the position of detective as periodically selected by the Chief of Police.

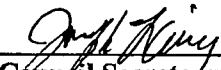
Section 2. This Ordinance shall take effect immediately and be in force from and after its enactment as provided by law.

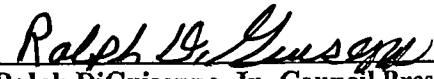
Section 3. Under the authority conferred by the Pennsylvania Borough Code at 8 Pa.C.S.A. §101 *et seq.*, and other relevant statutory law, the Council of the Borough of Bristol in the County of Bucks, Commonwealth of Pennsylvania does hereby enact and ordain this Ordinance for the Borough of Bristol.

Approved by the Borough Council of the Borough of Bristol, this 10th day of November, 2025.

Attest:

BOROUGH OF BRISTOL


Council Secretary


Ralph DiGuiseppe, Jr., Council President

Examined and approved this 10th day of November, 2025.


Ralph DiGuiseppe, III, Mayor

THIS ORDINANCE SHALL BECOME EFFECTIVE
IMMEDIATELY UPON ENACTMENT AND SIGNATURE