

120-
JF

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PLEDGE OF RESISTANCE; COMMITTEE IN :
SOLIDARITY WITH THE PEOPLE OF EL :
SALVADOR; ACT (formerly Penna. Campaign :
for a Nuclear Weapons Freeze); :
AMERICANS FOR DEMOCRATIC ACTION; CALL :
TO CONSCIENCE; CENTRAL AMERICA NETWORK; :
CHURCH AND WORLD INSTITUTE; CONCERNED :
ARTS COALITION; GAY AND LESBIAN :
TASKFORCE; KENSINGTON JOINT ACTION :
COALITION; NEW JEWISH AGENDA, CENTRAL :
AMERICA TASK FORCE; NATIONAL :
ORGANIZATION FOR WOMEN; PHILADELPHIA :
LABOR COMMITTEE ON CENTRAL AMERICA AND :
THE CARIBBEAN; SANE; TEMPLE COALITION :
FOR SOCIAL JUSTICE AND DISARMAMENT; :
ZENA LOVETT, JEFF NATT, GILLES :
GEMBERLING, ANITA KING, BOB HARRIS, :
STEVE KNAUSE, JOHN TOFFLEMIRE, GEORGE :
ALLEN, ANDREW LIPTON, LEANNE MILLER, :
DON STAUFFER, AMY STAUFFER, ALICE :
HASBROOK, JANE SWANSON, SETH KULICK, :
DR. THOMAS NOLLER, BOB MCMANMON, JOSEPH :
MILLER, PHIL SHINMAN, REBECCA JONES, :
EDWARD REED, JOHN GRANT, MIKE MCGINNIS, :
JUAN CARLOS RUIZ, BRIAN KANE, JAMES :
SIMPSON, SISTER MARGARET MCKENNA, :
SOPHIE GRODINSKY, PAM LUPFER, DONNA :
SHARER, LENORE FRIEDLAENDER, JERILYN :
BOWEN, SYLVIA METZLER, JOAN BRAUN, :
PETER HUNDLEY, and NORMAN KOERNER, :
Plaintiffs :

v.

WE THE PEOPLE 200, INC.; CITY OF :
PHILADELPHIA; ROBERT MITCHELL, FRANCIS :
FRIEL, WALTER DONAHUE, KEVIN TUCKER, :
WAYNE G. DAVIS, JAMES W. COLEMAN, JR., :
HOBART G. CAWOOD; JOHN DOE, RICHARD :
ROE, and JANE POE, :
Defendants :

FILED

JUN 29 1987

MICHAEL E. KUNZ, Clerk
By.....*AKS*.....Dep. Clerk

JURY TRIAL DEMANDED

Civil Action No. 87-3975

VERIFIED COMPLAINT

1. This is a civil rights action challenging the denial
by defendants of rights to freedom of speech, association,

assembly and privacy of plaintiffs and apparently anyone else who wishes to express views in opposition to those of the government or the institutions and people running the official celebrations of the 200th Anniversary of the Constitution of the United States.

Jurisdiction

2. This action for injunctive and declaratory relief and damages is brought pursuant to 42 U.S.C. §1983; 28 U.S.C. §§1331, 1343 and 2201; and the Constitution of the United States.

Parties

3. Plaintiff Pledge of Resistance is a nationwide network of citizens who have made a commitment of conscience to join with others in nonviolent opposition to the unconstitutional "covert" U.S. war on the poor in Central America. In order to further this goal, it co-sponsored the May 25 demonstration and plans further public events in relation to the celebration of the bicentennial of the Constitution. It is suing on behalf of itself and as representative of its members.

4. Plaintiff Committee in Solidarity with the People of El Salvador (CISPES), a co-sponsor of a May 25, 1987 demonstration, is a branch of a national grassroots organization working to build solidarity with the people in El Salvador and the rest of Central America who are actively struggling for independence and self-determination. CISPES organizes tours of Central America, fact-finding delegations, educational events,

collects humanitarian aid, legislative pressure, demonstrations and pickets in order to educate the North American public about Central America and to pressure the United States government to end all intervention in the region. CISPES is planning further demonstrations and political activities around upcoming Constitutional bicentennial events. It is suing on behalf of itself and as representative of its members.

5. Plaintiff ACT is an organization made up of the Philadelphia and Delaware County Campaigns for a Nuclear Weapons Freeze, the Montgomery County Alliance for Nuclear Disarmament and SANE, whose purpose is to organize around the bicentennial of the Constitution to highlight the historical roots of contemporary social movements. It is endorsing the July 16 and September 17 protests around the visits of Congress and the President; its members will participate in those events as well as in the September 17 official parade. It is suing on behalf of itself and as representative of its members.

6. Plaintiff Americans for Democratic Action (ADA) is a non-profit organization involved in educating, endorsing and working on political campaigns. It anticipates taking part in various actions over the summer and endorses other organizations' right to participate in peaceful protest. It is suing on behalf of itself and as representative of its members.

7. Plaintiff Central America Organizing Project does grass roots organizing on Central American issues with churches and community organizations and encourages its constituents to

participate in public educational events. Its members participated in the May 25th demonstration and intend to participate in other Bicentennial related events. It is suing on behalf of itself and as representative of its members.

8. Plaintiff Call to Conscience is a national coalition of community peace and justice groups who oppose United States support for apartheid and United States efforts to destabilize the frontline states in Southern Africa. Members participated in the May 25 demonstration; the group is sponsoring a demonstration on July 16 in conjunction with the Bicentennial celebration. It is suing on behalf of itself and as representative of its members.

9. Plaintiff Central America Network is an umbrella organization of approximately 20 area groups in opposition to U. S. Central America policies. In addition to supporting and promoting the campaigns, events and demonstrations of individual groups and launching its own campaigns, the Network calls demonstrations to further its goals. The Network and its members will participate in demonstrations and political activities around upcoming Constitutional bicentennial events. It is suing on behalf of itself and as representative of its members.

10. Plaintiff Church and World Institute, Protestant Advisory Board at Temple University is a center for campus ministry at Temple University. The Institute is a member of the Philadelphia Pledge of Resistance, in part to fulfill its

charter. Members or representatives participated in the May 25 demonstration at Independence Mall and are scheduled to participate in similar events pursuant to the We The People bicentennial celebration. It is suing on behalf of itself and as representative of its members.

11. Plaintiff Concerned Arts Coalition (CAC) is a non-profit organization made up of socially active artists and musicians dedicated to putting on benefit concerts and events raising money for political or social organizations involved in various facets of social change. Members participated at the May 25th demonstration and will attend and participate at future demonstrations and political activities around upcoming Constitutional bicentennial events. The organization has endorsed the Call to Conscience demonstration on July 16th and upcoming demonstration on September 17th. It is suing on behalf of itself and as representative of its members.

12. Plaintiff Feminists in Solidarity is a feminist organization seeking to create ties between the feminist movement and the movements for peace, equality, jobs and human needs. Members participated in the May 25 demonstration and plan to participate in similar events scheduled throughout the Bicentennial celebration. It is suing on behalf of itself and as representative of its members.

13. Plaintiff Jobs with Peace is an alliance of religious, labor and citizen groups working for a stronger and more peaceful economy. Its members participated in the May 25

demonstration and anticipate participating in the July and September Bicentennial planned events. It is suing on behalf of itself and as representative of its members.

14. Plaintiff Kensington Joint Action Council (KJAC) is a grassroots, multi-racial coalition of community groups and individuals organizing in a poor and working class neighborhood in Philadelphia. It engages in direct action organizing, demonstrating and other ways to work on local issues of housing, education, crime and safety, gentrification, and community reinvestment, and on international issues such as Central America and South Africa. Members participated in the May 25 demonstration and plan to participate in further event during the bicentennial celebration. It is suing on behalf of itself and as representative of its members.

15. Plaintiff Lesbian and Gay Task Force is a civil rights organization dedicated to obtaining civil, human and constitutional rights for lesbian and gay people. In this vein its members participated in the May 25th demonstration; it is sponsoring, conducting and organizing a July demonstration related to the Bicentennial celebration and is supportive of other events related to the Bicentennial celebration. It is suing on behalf of itself and as representative of its members.

16. Plaintiff National Organization for Women (NOW) is the nation's largest women's rights organization whose goal is to bring women into full participation in American society. It plans its annual national conference in Philadelphia from July

17 to 19. Plans include a torch relay run on July 16 through center city to Independence Mall, a large march for the ERA from 17th and Vine to Independence Mall on July 18 and a rally at Independence Mall at Judge Lewis Quadrangle. It might also do occasional picketing at We The People events. It is suing on behalf of itself and as representative of its members.

17. Plaintiff New Jewish Agenda is a local chapter of a national organization active in many issues of concerns to progressive American Jews including an end to United States intervention in Central America, Nuclear Disarmament, Gay Rights, economic justice and peace in the Middle East. Members participated in the May 25 demonstration and plan to participate in similar events throughout the Bicentennial. It is suing on behalf of itself and as representative of its members.

18. Plaintiff Philadelphia Committee for Health Rights in Central America (CHRCA) is the Philadelphia branch of a nationwide network of health care workers that does fundraising to pay for medical supplies for the people of Nicaragua and that informs medical professionals about the contra war and its affects on health care in Central America. Its members participated in the May 25th demonstration and plan to support similar activities throughout the Bicentennial celebration. It is suing on behalf of itself and as representative of its members.

19. Plaintiff the Philadelphia Labor Committee on Central America and the Caribbean is a voluntary advocacy organization

of trade union members and officers who support basic human and trade union rights and oppose the growing United States intervention in Central American and the Caribbean. The Committee's members include officers of the Newspaper Guild, United Electrical, Radio and Machine Workers, American Federation of State, County, and Municipal Employees, International Association of Machinists, Amalgamated Clothing and Textile Workers Union, America Postal Workers Union, Graphic and Communications International Union, American Federation of Teachers, Philadelphia Federation of Teachers, Pa. Social Services Union, National Union of Hospital and Health care Employees, Transport Workers Union, and United Food and Commercial Workers. The committee is a member of the Central America Network and is encouraging its members to participate in the planned demonstration on July 16. It is suing on behalf of itself and as representative of its members.

20. Plaintiff Committee for a Sane Nuclear Policy (SANE) is a 30 year old national organization that opposes the proliferation of nuclear weapons and urges conversion of military related industry to a peace economy. Members are participating in the upcoming demonstrations planned around the Bicentennial celebration. It is suing on behalf of itself and as representative of its members.

21. Plaintiffs Zena Lovett, Jeff Natt, Gilles Gemberling, Anita King, Bob Harris, Steve Knause, John Tofflemire, George Allen, Andrew Lipton, Leanne Miller, Don Stauffer, Amy Stauffer,

Alice Hasbrook, Jane Swanson, Seth Kulick, Dr. Thomas Noller, Bob McManmon, Joseph Miller, Phil Shinman, Rebecca Jones, Edward Reed, John Grant, Mike McGinnis, Juan Carlos Ruiz, Brian Kane, James Simpson, Sister Margaret McKenna, Sophie Grodinsky, Pam Lupfer, Donna Sharer, Lenore Friedlaender, Jerilyn Bowen, Sylvia Metzler, Joan Braun, Peter Hundley, and Norman Koerner are individuals who have been prevented by defendants from exercising free speech rights and who wish to exercise such rights in the future in connection with events commemorating the 200th Anniversary of the Constitution.

22. Defendant We the People 200, Inc. is a nonprofit corporation established and controlled by the City of Philadelphia and funded by the City, the Commonwealth of Pennsylvania, the federal government and private donors.

23. Defendant City of Philadelphia is a municipal corporation and a city of the first class pursuant to the laws of the Commonwealth of Pennsylvania.

24. Defendants Robert Mitchell, Francis Friel and Walter Donahue are a chief inspector, captain and sergeant, respectively, in the Philadelphia Police Department with duties that include intelligence and security regarding the celebrations of the 200th Anniversary of the Constitution.

25. Defendant Kevin Tucker is Police Commissioner of the City of Philadelphia and as such is the highest managerial and policy making official of the Police Department.

26. Defendant Wayne G. Davis is Special Agent in Charge, the highest management and policy making official, of the Philadelphia office of the Federal Bureau of Investigation.

27. Defendant James W. Coleman, Jr is Regional Director, the highest management and policy making official, of the Philadelphia office of the Mid-Atlantic Regional Office of the United States Park Service.

28. Defendant Hobart G. Cawood is Superintendent, the highest management and policy making official, of the Independence National Historical Park and Chair of Defendant We The People 200.

29. Defendants John Doe are officials, agents or officers of the Commonwealth of Pennsylvania or the City of Philadelphia whose identities are not known to plaintiffs at this time.

30. Defendants Richard Roe are officials, agents or officers of the federal government whose identities are not known to plaintiffs at this time.

31. Defendants Jane Poe are private individuals and/or officials, agents or officers of private institutions whose identities are not known to plaintiffs at this time.

32. All individual defendants employed by federal, state or local governmental entities or agencies or private institutions acted within the scope of their employment, and they are all sued individually and in their official capacities. All defendants acted in concert with each other and under color of state and/or federal law.

Cause of Action

33. Plaintiffs are a variety of groups and individuals who have engaged and/or intend to engage in the future in constitutionally protected conduct aimed at expressing their views on the major issues of our day, including issues of war and peace in Central America and other parts of the world, the economy, discrimination, the military buildup and the danger of nuclear war, and civil liberties.

34. Defendants are local and federal law enforcement officials and the agency running the government's official celebration of the 200th Anniversary of the Constitution of the United States. Defendants have interfered with the peaceful, legal and constitutionally protected exercise of free speech rights by plaintiffs and others as part of an ongoing pattern, course of conduct and conspiracy to prevent opposition to current government policies or to defendants' extremely narrow conception of how the anniversary of the Constitution should be celebrated and understood from being expressed or noticed by the public or the news media. This pattern, course of conduct and conspiracy has included the events alleged in paragraphs 35-49, infra.

35. In the Spring of 1987, Plaintiffs Pledge of Resistance and CISPES planned to express their opposition to the growing United States involvement and intervention in Central America in the areas open to the public in the vicinity of the celebration on May 25, 1987 organized by Defendant We The People

200 and to be attended by high government officials, including the Vice President of the United States. Plaintiffs' plan was to talk to whomever would listen, distribute literature, carry signs, and wear buttons to alert the public to the massive military maneuvers being conducted by our government in Central America, which have been almost completely blacked out by the major media, and to persuade the public to oppose United States intervention. They hoped to convince people with views different from theirs, to encourage people who agree with them, and to demonstrate to the assembled officials and the public their opposition to current government policy.

36. Plaintiffs informed the Civil Affairs Unit of the Philadelphia Police Department of their general intention and plans about three weeks prior to May 25 and briefed them further on the details on May 21. Plaintiffs also discussed the details further with the police on the morning of May 25. Throughout these discussions, it was made clear that no disruptive or illegal activity was planned.

37. It is accepted and customary in Philadelphia to inform the appropriate authorities regarding a gathering, demonstration or march by notifying the Civil Affairs Unit. Permits are not in practice required unless there is a very large event and/or there will be some substantial interference with traffic or other usual functions. When the Civil Affairs Unit believes a permit is necessary, they inform the demonstrating group, which was not done in this instance.

Regarding the Mall area, plaintiffs did not plan to use it to the exclusion of anyone else, and it was maintained by defendants as wholly open to the public, which plaintiffs thought, and still think, includes them.

38. Throughout the day on May 25, defendants used a variety of means to prevent plaintiffs from expressing their views, to keep plaintiffs out of the view of the public and the media, and to insure that no opposition to current government policies or to defendants' conception of how the anniversary of the Constitution should be celebrated and understood was effectively communicated or heard. Specifically, defendants forbade and silenced any expression of opposition to United States intervention in Central America in areas near the celebration that were otherwise completely open to the public--whether expressed by a group marching, a banner, a sign held by an individual or even a button worn on an individual's shirt.

39. Defendants forced the 200 to 300 individual plaintiffs and others who gathered with Plaintiff Pledge and CISPEs to move away from the celebration and falsely told plaintiffs' representatives that the path they wished to take was closed to the public for security reasons.

40. Defendants moved a soapbox erected next to the Liberty Bell, for the purpose of providing a forum for members of the public, to a less visible and less frequented location specifically to prevent plaintiffs from using it there.

41. Defendants erected barriers specifically to prevent plaintiffs from entering the Independence Mall area south of Market Street (between 5th and 6th Streets), although that area was otherwise completely open to the public and its use by the public did not interfere in any way with, and was actually part of, the event planned by defendants. When plaintiffs moved to either side of these barriers, defendants moved the barriers so they would always block plaintiffs' access.

42. Thousands of civilians were on the open Mall, and they could come and go as they pleased and wear or display buttons or other expressive articles that conveyed messages that did not offend defendants (such as We The People 200 buttons).

43. Plaintiffs were refused entry to this area, in large or small groups, in pairs or individually--the only criterion for such treatment was whether one was identified as an opponent of the government's Central America or other policies or one was associated with such opponents.

44. Individual plaintiffs Zena Lovett, Jeff Natt, Gilles Gemberling, Anita King, Bob Harris, Steve Knause, John Tofflemire, George Allen, Andrew Lipton, Leanne Miller, Don Stauffer, Amy Stauffer, Alice Hasbrook, Jane Swanson, Seth Kulick, Dr. Thomas Noller, Bob McManmon, Joseph Miller, Phil Shinman, Rebecca Jones, Edward Reed, John Grant, Mike McGinnis, Juan Carlos Ruiz, Brian Kane, James Simpson, Sister Margaret McKenna, Sophie Grodinsky, Pam Lupfer, Donna Sharer, Lenore Friedlaender, Jerilyn Bowen, Sylvia Metzler, and Joan Braun were

denied entry to, or were removed from, the open area of the Mall on May 25, 1987. The circumstances of their exclusions included the following:

a. Plaintiff Zena Lovett and her husband and two daughters, at the Mall to participate in the festivities and celebrate their wedding anniversary, were denied entry to the Mall by a Philadelphia policeman because they approached the Mall with the Pledge and CISPES group. The officer said they could enter as individuals but not with any button on except a "We The People button."

b. Plaintiff Michael McGinnis was denied entry to the Mall by Philadelphia police even to get to the portable men's room because he wore a small sign on his shirt saying "Nicaraguans Are Not Your Enemies."

c. Plaintiff John Grant was pushed away from the Mall by two Park Rangers because he was with someone who had a sign.

d. Plaintiffs Don and Amy Stauffer had signs pulled out of their hands on the sidewalk next to the Mall by a Park guard who shouted, "No signs."

e. Plaintiff Anita King was denied access to the Mall by Philadelphia police because she wore a button saying "Free South Africa--End Apartheid." An officer told her that only "Reagan people" and people without signs or buttons could enter.

f. Plaintiff Seth Kulick was refused access to the Mall by Philadelphia police because he wore a button that stated "Stop the Secret Team--Defend Our Constitution."

45. Defendants encircled and barricaded people who approached 6th and Market Streets with Plaintiffs Pledge and CISPES, including the individual plaintiffs listed in paragraph 44.

46. Plaintiffs Brian Kane, Jeff Natt, and James Simpson attempted to leave the barricaded area to carry a small wreath into the Mall as a symbolic protest of the government's Central America policies. Defendants arrested them and Plaintiff McManmon, assaulted Plaintiffs Natt and Kane, and charged all four plaintiffs with disorderly conduct without any legitimate justification or provocation. On June 22, 1987, at the request of the District Attorney's Office, the charges were disposed of by being placed in the ARD program.

47. In these instances and the additional events before and after May 25 alleged infra, defendants were acting pursuant to considered, purposeful policies. On or about March 16, 1987, defendants and others met at the Hershey Hotel in Philadelphia to discuss "security" and "terrorism" with regard to the events commemorating the Constitution. This meeting was attended by about 90 people, including Defendants Captain Friel and Sergeant Donahue, and it was authorized and sanctioned by Defendants Tucker, Davis, Coleman and Cawood. While Defendant Friel has been quoted by the Philadelphia Inquirer as saying, "We do not

have any intelligence that this city is in any danger" (emphasis added), detailed plans were made at this and other meetings involving collection of "intelligence," spying on and infiltration of political and advocacy groups, and control of all forms of dissent at the events.

48. Prior to May 25, defendants prevented plaintiffs from distributing leaflets urging people to join the activities planned by Plaintiffs Pledge and CISPES for May 25.

a. On May 22, 1987 at about 8:30 p.m., Defendant Peter Hundley went to a concert on the Parkway to distribute such leaflets. He was approached near 23rd Street, in an area open to the public, by an official of Defendant We The People 200, who said no one could distribute literature at or around the concert there except on behalf of We The People 200. When plaintiff continued to leaflet, the We The People 200 official returned with an official from the City's Licenses and Inspections Department and two police officers, who prevented plaintiff from leafletting. They informed plaintiff that he needed a permit, "like the hotdog vendors," and that We The People 200 has final say over permits and certainly would not grant him one.

b. On May 24, 1987, Plaintiff Norman Koerner, a member of the staff of Plaintiff CISPES, was prohibited by defendants from distributing these same leaflets at 22nd Street and the Parkway, although the area was completely open to the public.

49. As part of their concerted efforts to control and suppress expression of opposition to current government policies during the celebrations of the bicentennial of the Constitution, since late 1986 Defendant City of Philadelphia, and at least since March 1987 the other defendants, have subjected a variety of political and advocacy groups in Philadelphia, including some of the plaintiff groups, to spying, surveillance and infiltration by agents and informers without any legitimate cause or purpose. Upon information and belief, the Philadelphia police have at least one undercover officer who is active in Plaintiff Pledge. Files are being compiled on a range of public advocacy groups--by a police intelligence unit that usually deals with organized crime--containing documents on wholly legal, private and constitutionally protected activities.

50. Defendants' pattern and course of conduct is not new in Philadelphia. In 1972, Philadelphia police and federal authorities prevented any visible display of dissent at Independence Mall when President Richard Nixon came to sign the Revenue Sharing Act. The practice was strongly condemned by this Court. See Farber v. Rizzo, 363 F.Supp. 387 (E.D.Pa. 1973). The use of surveillance files against political, advocacy and religious groups was limited in Philadelphia Yearly Meeting v. Rizzo, 519 F.2d 1335 (3d Cir. 1975), and a subsequent agreement was reached whereby the practice was to stop and the existing files were to be destroyed.

51. There is no reasonable or appropriate basis on which to believe that any of the plaintiffs present a danger at celebrations of the anniversary of the Constitution or anywhere else. Plaintiffs simply disagree with current government policies and the very narrow way in which We The People 200 and other defendants wish to celebrate the Constitution and to depict the United States and its role in the world. In the best tradition of our Constitution, plaintiffs have actively sought to engage their fellow citizens in a dialogue and to protest what they see as wrong. In another American tradition, defendants have sought to discredit plaintiffs and avoid dealing with their criticism by preventing them from being seen or heard and by falsely placing labels on them that the public finds frightening and upsetting.

52. The conduct of defendants is pursuant to and in furtherance of the policies and practices of the defendant governmental and private agencies, and the heads of these agencies, including Defendants Tucker, Davis, Coleman and Cawood, set, approved and implemented these policies and practices, including the specific events alleged herein.

53. These various actions by defendants violate plaintiffs' rights of free speech, association, assembly and privacy, and they chill and deter open, free public discourse. Plaintiff organizations' efforts to espouse their views and make them widely known have been substantially impaired, and the known and potential presence of infiltrators or informers has

discouraged the active and full participation of present and potential members.

54. The actions and conduct of defendants, acting under color of law and in their individual and official capacities, deprived plaintiffs of their rights, privileges and immunities secured by the First, Fourth, Fifth, and Fourteenth Amendments to the Constitution of the United States and 42 U.S.C. §1983.

55. Defendants pattern and course of conduct will continue unless restrained by this Court. Specifically, defendants' policies are ongoing, and defendants will continue their practice of violating fundamental constitutional rights at future planned events commemorating the anniversary of the Constitution, including the events described above scheduled for July 16 and September 17, 1987. Plaintiffs wish to peacefully exercise their free speech rights at these events. Their remedy at law is inadequate, and they will be irreparably harmed if injunctive and declaratory relief are not granted.

Relief

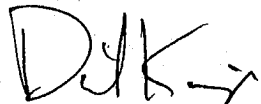
WHEREFORE, plaintiffs request the following relief:

- a. A preliminary and permanent injunction restraining the defendants from violating plaintiffs' constitutional rights to freedom of speech, association, assembly and privacy;
- b. A declaratory judgment that defendants' conduct is unconstitutional;
- c. Compensatory damages;

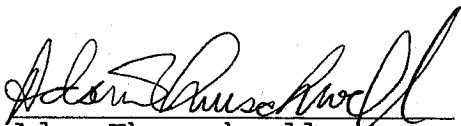
- d. Reasonable attorney fees and costs; and
- e. Such other and further relief as appears reasonable and just.

Respectfully submitted,

NATIONAL EMERGENCY CIVIL
LIBERTIES COMMITTEE by:



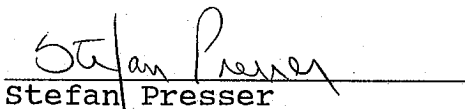
David Kairys



Adam Thurschwell

Kairys & Rudovsky
924 Cherry St.
Philadelphia, PA. 19107
(215) 925-4400


AMERICAN CIVIL LIBERTIES
UNION by:



Stefan Presser
ACLU
21 S. 5th St.
Philadelphia, PA. 19106
(215) 592-1513

Dated: June 29, 1987

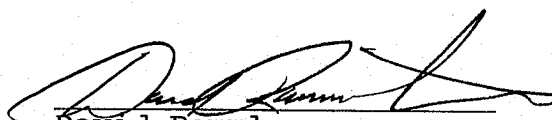
NATIONAL LAWYERS GUILD
by:



Gloria Gilman
924 Cherry St.
Philadelphia, PA. 19107
(215) 627-7299



Julie Shapiro
21 S. 5th St.
Philadelphia, PA. 19106
(215) 922-5135



David Rammler
Rammler & Langston
1616 Walnut St.
Philadelphia, PA. 19103
(215) 732-3255

COMMONWEALTH OF PENNSYLVANIA :
 : SS.
COUNTY OF PHILADELPHIA :

AFFIDAVIT

Lenore Friedlaender, being duly sworn according to law,
deposes and says that the facts alleged in the foregoing
Complaint are true to the best of her knowledge, information and
belief.

Lenore Friedlaender
Lenore Friedlaender

Sworn to and subscribed
before me this 26 day of
July, 1987.

Ilene Kalman
Notary Public

ILENE KALMAN
Notary Public, Phila., Phila. Co.
My Commission Expires June 27, 1988