

AFFIDAVIT OF PROBABLE CAUSE IN SUPPORT

Because of the potential wide circulation of this document, certain

SEARCH AND SEIZURE WARRANT

97823

folks last names and other info has been blacked out in the interest of privacy, even if it seems like a name that everyone and their brother already knows. thanks.

Your Co-Affiants, Corporal Howard W. SHEPPARD and Trooper Gregg J. -k.

KRAVITSKY, being duly sworn according to law, states:

A. CO-AFFIANTS

Your Co-Affiant, Cpl. Howard W. Sheppard is a member of the Pennsylvania State Police (PSP) and has been so employed since May of 1986. I am presently assigned to the Bureau of Criminal Investigation, Criminal Investigation Assessment (CIA) Unit and serve as the Unit supervisor. I oversee and conduct behavioral analysis of violent crimes committed in the Commonwealth of Pennsylvania. Your Co-Affiant, as a member of the Pennsylvania State Police, has conducted criminal investigations involving violent crimes against persons and crimes against property. Your Co-Affiant has applied for and assisted in the application and execution of search and seizure warrants surrounding the aforementioned criminal investigations involving violations of crimes so enumerated in Title 18, Pennsylvania Crimes Code. Said search and seizure warrants have resulted in the arrest of persons and seizure of property possessed as evidence of a crime.

Your Co-Affiant, Tpr. Gregg J. Kravitsky is a member of the Pennsylvania State Police (PSP) and has been so employed since April 1988. I am presently assigned to the Bureau of Criminal Investigation, Organized Crime Division Eastern Task Force. In my present position as an investigator I am responsible for conducting undercover and covert investigations of corrupt organizations relating to illegal narcotic, vice, gambling, traditional and nontraditional organized crime activities throughout the Commonwealth and in particular the Southeastern portion of Pennsylvania.

In my capacity as a PSP Trooper, I have participated in more than 125 undercover criminal investigations resulting in the arrest of more than 200 persons for their involvement in violations enumerated in the Pennsylvania Crimes Code. I have written and/or participated in more than seventy-five search and seizure warrants involving narcotic, vice, gambling and other criminal offenses. I have received specialized training in the investigation of illegal drug trafficking and criminal investigation from the PSP, the Office of Attorney General of Pennsylvania (OAG), the United States Drug Enforcement Administration (DEA), The Internal Revenue Service (IRS) and the Middle Atlantic Great Lakes Organized Crime Law Enforcement Network (MAGLOCLLEN).

Currently, your Co-Affiants are part of a joint task force consisting of various operational units within the Pennsylvania State Police assigned to the Republican National Convention (RNC).

Throughout this affidavit your Co-Affiants will make reference to several terms and acronyms. The following paragraphs will provide an overview of these terms and a brief synopsis of some of the activist groups that your Co-Affiants believe are going to be present and active in the Philadelphia region during the upcoming Republican National Convention (RNC) scheduled to be held in Philadelphia, Pennsylvania from July 31, 2000 to August 3, 2000.

Republican National Convention (RNC)

World Trade Organization (WTO)

World Bank (WB)

International Monetary Fund (IMF)

Affinity Groups (AG) – small groups of 3-20 people whom share a common identity or interest and work together during demonstrations/protest.

Direct Action Group (DAG) – group of 2-25 persons who work closely together to facilitate demonstrations/protests relating to civil disobedience/violence.

Action Spokescouncil – a voting committee made up of representatives from each Affinity Group. It coordinates actions, tactics and scenarios and is a decision making body.

Clusters – formed from two or more Affinity Groups who want to work on a common cause.

Police Liaisons – persons designated by their Affinity Group to engage police in stall tactics.

Convergence Centers – designated locations that register, feed, coordinate and dispatches protestors and groups engaged in demonstration/protest activities.

Philadelphia Direct Action Group (PDAG) – DAG located in Philadelphia Pennsylvania

Training – commonly referred to by activist where they receive instruction in logistics, action planning and tactics for protest

“Shut Down” – means to disrupt, delay or stop an event from taking place through the use of protest activities.

Elves – persons assigned during a protest to provide for the well being of fellow protestors

Legal Teams – persons assigned during a protest to monitor and document behavior of police and the protestors

Medical Teams – persons assigned to provide first aid to protestors

Jail Solidarity – a conscious and collective effort by arrested activist to influence the legal system by refusing to cooperate with jail/court authorities

! Caribiner - spring loaded metal clip traditional used during mountain climbing

Revolutionary Anti-Capitalist Bloc (RACB) anarchists, who are also known as the “Black Bloc” have claimed responsibility for the agitation and violence which occurred during protests at IMF/World Bank meetings in Washington, D.C. Their postings have appeared on both Mid-Atlantic Infoshop and Independent Media web sites.

R2K Committee of the Pennsylvania Consumer Action Network PCAN), AKA Philadelphia 2000 Welcoming Committee, AKA Philadelphia Freedom Center,

PCAN claims to be a well-established and diverse coalition of consumer, environmental and organized labor groups. According to a Maldon Institute report dated 04/07/00, PCAN is a United States conveyor for People's Global Action (PGA), a self-styled "leaderless" international network of groups opposed to the global market economy. PGA campaigns use their "direct action" demonstrations to influence world public opinion against the West's economic system. They target local symbols of capitalism from stock exchanges to fast food outlets. Funding for the PGA does not appear to be a problem. Funds allegedly originate with Communist and leftist parties and from sympathetic trade unions. Other funds reportedly come from the former Soviet-allied World Federation of Trade Unions.

Direct Action Network (DAN), AKA Philly Direct Action Group (PDAG), AKA Direct Action Group; DAN did not exist prior to WTO conference. It is actually a spin-off of Community Action Network. It has no real organizational structure and is a loose knit confederation of activists with a variety of perspectives and causes that came together for WTO. There are no real directors of the organization, but heads of other activist groups all volunteer within this group. It was successful beyond even DAN's dreams because of the large number of people affected by the WTO. Direct Action Group Communications/Web Site contact person, T [REDACTED], was interviewed at a Ruckus Society training camp in Arcadia, FL. During the interview, he was identified as being a member of

ACTUP Philadelphia. He stated that he was training to do "Direct Action" at the RNC.

Kensington Welfare Rights Union (KWRU), aka Union of the Homeless, AKA Pennsylvania Welfare Rights Union (PWRU); Founded in 1991, the group has a long history of nonviolent protests and civil disobedience. KWRU organizer, C [REDACTED] champions "peoples' rights vs corporate rights." Ms. H [REDACTED] has publicly stated that official plans calling for a "demonstrators' park" or free speech zone" at Roosevelt Park, is not acceptable for her group's exercise of its constitutional right of free speech. According to an Associated Press news article dated 02/05/00, a march by KWRU, scheduled for 07/31/00, will end at the First Union Center. Executive Director C [REDACTED] stated she "would not rule out disrupting traffic or public transit" as part of the march.

Anarchists; (a generic name for several groups) Intelligence indicates that there are 25 Anarchist Groups in the Philadelphia, Baltimore, Washington area. Local membership is unknown but presumed to be small. The Anarchists have a long history of disruptive behavior. In Philadelphia, small groups, usually numbering less than ten, have supported other groups during nonviolent protest or demonstrations. Several members have been arrested for acts of civil disobedience in the Philadelphia area. Major media sources report that violent acts committed during the WTO in Seattle and the IMF in Washington, D.C. were committed by anarchists in an attempt to incite other demonstrations. Anarchists

in the Philadelphia area have announced that they will protest during the RNC.

Ruckus Society; Formed in October 1995, the Ruckus Society provides training in the skills of non-violent civil disobedience to help environmental and human rights organizations achieve their goals. Ruckus also aids and abets a growing number of organizations in action planning, logistics, tactics, staff preparation and volunteers for high-profile direct actions.

According to a news article in the Philadelphia Inquirer, dated 02/24/00, J [REDACTED] [REDACTED] of the Berkeley-based Ruckus Society, which helped organize the Seattle march and is helping with IMF protest, said the Washington demonstrators could encourage more protestors to go to Philadelphia. While an anti-globalization message is the catalyst for planned Washington demonstration, activists say, in Philadelphia it will be the influence of corporations in government. S [REDACTED] related some demonstrators expect and may hope for some violent reaction from police in both Philadelphia and Los Angeles, site of the Democratic Convention. S [REDACTED] is quoted "If we can't get a couple thousand nonviolent protesters' asses kicked in Philadelphia and Los Angeles, we haven't learned a thing." On 05/24/00 J [REDACTED] [REDACTED] was interviewed during a Channel 6 News Special Report entitled "Professional Protestor." During that report S [REDACTED] was interviewed at a Ruckus training camp in Arcadia, FL. In that interview S [REDACTED] stated "A confrontation is brewing and it's coming to Philadelphia." Channel 6 also conducted an interview of T [REDACTED] of ACTUP Philadelphia. M [REDACTED] stated "We're training

to do direct action at the Republican Convention." M [REDACTED] is also listed as the Communications contact for the Philadelphia Independent Media Center. As of July 2000, M [REDACTED] has been identified as a key figure in PDAG. Ruckus has sponsored training in Philadelphia for both the IMF and RNC.

Aids Coalition To Unleash Power (ACTUP); According to their mission statement, "ACTUP is a diverse, non-artisan group of individuals united in anger and committed to direct action to end the aids crisis." The organization has been a frequent participant in demonstrations in the Philadelphia area. There is a history of confrontation and civil disobedience. Philadelphia ACTUP was among group of 500 protestors from the Philadelphia area who traveled to the IMF protests in Washington, D.C. One of the leaders was K [REDACTED]. S [REDACTED] is a R2K representative, and is also a member of ACTUP, 2000 Queers and the Philadelphia Direct Action Group. S [REDACTED] has made statements indicating that if ACTUP members were arrested they would not give their real names. Instead they would use code names such as "Mary Cheesecake" and would be prepared to stay in jail "flooding the system until they (law enforcement authorities) gets tired of us," There is an indication that this group intends to protest at the RNC. However, it is not known if the group will organize their own protests, or join the R2K coalition. The organization has a long history of demonstrating at political events in Philadelphia.

International Concerned Friends and Family of Mumia Abu-Jamal; This coalition of groups supports former Black Panther and radio personality, Mumia Abu-Jamal. Jamal is imprisoned for the 1981 murder of Philadelphia Police Officer Daniel Faulkner. The coalition has demonstrated in cities throughout the United States and in foreign countries. On 06/16/1999, 1,000 supporters blocked a major intersection in the city of Philadelphia at Broad and Spring Garden Streets. The International Concerned Family and Friends of Mumia Abu-Jamal is supported by numerous subgroups throughout the United States and abroad. Intelligence indicates two of those groups, The National People's Campaign, and Refuse and Resist, are considering demonstrations at the RNC and DNC.

National People's Campaign (NPC), AKA All People's Congress (APC), AKA International Action Group; A front group of the Workers World Party, the Organization has been known by a number of names which included the All People's Congress, the People's Anti-War Mobilization and the International Action Center. The name National People's Campaign was adopted in 1995 in order to combat the Republican's Contract with America which they regarded as a "threat to the rights of workers, people of color, women, immigrants, lesbian, gay, bi-sexual, transgender community, and other disenfranchised groups." The NPC is the primary organizing entity in New York City in support of Mumia Abu-Jamal. NPC was instrumental in organizing the demonstration and civil disobedience at the Liberty Bell in Philadelphia on 07/03/1999 in which there

were 96 arrests. They also claimed to have organized the demonstration and civil disobedience which occurred at the Supreme Court in Washington, D.C. on 02/28/00 in which there were 185 arrests. NCP has announced that they are planning for major demonstrations at both conventions calling for a new trial for Mumia and opposing the death penalty. 250 demonstrators were arrested during the IMF protests in Washington, D.C. They were marching under the auspicious of the International Action Group and were protesting the Death Penalty.

Independent Media Center—Philadelphia; The Independent Media Center mission statement states, in part, "Coordinate coverage by teams of independent video, audio, photo and print journalists, producing a sophisticated web site, television and radio programs, and print media. The focus will be on what happens outside the convention center: the impact on the city and its people lives, and the diverse range of perspectives that will be represented in a variety of protest marches, rallies and other events during convention week." Independent Media Centers were established in Seattle during the WTO protests and in Washington, D.C. during the IMF protests. They focus on the protest marches, rallies and what they perceived as police misconduct and brutality. Information indicated that members of the IMC conducted counter surveillance of law enforcement. They also monitored broadcasts of police radio communications and provided real time broadcasts of same over the Internet. The IMC provided communications between groups of demonstrators and orchestrated their movements.

BACKGROUND¹

From November 30 through December 3, 1999, a four day World Trade Organization (WTO) conference was held in Seattle, Washington. The conference brought together 5,000 delegates, government officials and journalist from 135 countries. The purpose of the conference was to launch a new round of global talks.

The WTO conference was disrupted by persons whose stated and well publicized intention was to "shut down" the WTO. One method of civil disobedience used by the protesters in Seattle was street blockades, in which groups of individuals blocked passage through streets. The protestors employed specially crafted tools and implements of a crime to successfully block the streets. The legitimate flow of pedestrian and vehicular traffic in and around private and/or public buildings were blocked. These activities resulted in several days of violence and led to a declaration of a state of emergency by the Mayor of Seattle. The city of Seattle sustained, as a result of the disturbances, 3 million dollars in property damage to the city.

¹Source: Washington D.C. Metropolitan Police Department

Among the specially crafted tools and implements used by the protestors in Seattle, Washington to block streets was a device known as the "sleeping dragon" or "lock box." The purpose of this device is to facilitate the blocking of pedestrian and vehicular traffic. It is constructed in two varying ways: the first is a four inch wide steel pipe cut to a length of three to four feet. A steel rod is then welded into the middle of the pipe. Two persons then place their arms within the opposite openings of the pipe, using spring clips to attach each of their respective wrist to secure themselves together inside of the pipe. The second method utilizes, instead of steel pipe, Polyvinyl Chloride (PVC) pipe. Used in a manner similar to the steel pipes, the PVC pipe is encased with metal wiring, concrete or tar. The purpose of the tar is to gum up any power tool utilized to extract persons from the device. Once the pipe has been specially modified as described, its only known use is as an device/implement to block passage through the streets.

On April 16-17, 2000, the World Bank and International Monetary Fund (IMF) served as co-host in Washington, D.C. to a semi-annual meeting of delegates to each of the international bodies. Various protest organizations had publicized their intention, as in Seattle, Washington, to "shut down" the conference. The organizations had publicly stated that they had begun preparations to achieve their goals.

Through investigative efforts, law enforcement officials in Washington, D.C. identified specially crafted tools and other implements of a crime being built or stored by the protestors as having the same design and/or type used in Seattle, Washington.

Pre-emptive law enforcement measures were carried out through the execution of search and seizure warrants by law enforcement authorities which resulted in the seizure of the aforementioned specially crafted tools and other implements of a crime. As a result, property damage caused by the disturbances were minimized.

A review of newspaper articles printed in the Philadelphia Inquirer, USA Today, Bucks County Courier Times, Philadelphia Daily News, Philadelphia City Paper and the Associated Press covering the RNC was conducted. The information printed in the articles revealed a consistent theme relative to protest activities regarding the WTO in Seattle Washington in 1999 and the IMF in Washington DC in April of 2000. The information contained in the articles indicated that the protestors intent is to "shut down" the RNC through the use of methods employed through Direct Action Groups that were used at the WTO and IMF.

A review of a publication titled "Mobilization for Global Justice, Action Guide, Washington D.C." was conducted. The guide provides definitions

of and tactics to be used by designated groups of protestors assigned specific task to include: Affinity Groups (AG), Clusters, Action Elves, Blockades, Police Liaisons, Legal Observers, and Medical Teams. The guide provides instruction in the efforts to overcome police intervention during a disturbance and how to invoke "Jail Solidarity" after being arrested.

Investigation

The Republican National Convention (RNC) is scheduled to be held in Philadelphia, Pennsylvania starting on July 31, 2000 and continuing to August 3, 2000.

Pennsylvania law enforcement authorities monitored the aforementioned events in Seattle, Washington and Washington, D.C. Based on this measure, information was obtained relative to the disturbances and the persons who engaged in the unlawful activities. The conclusion based on these observations were; the activities that resulted in disturbances posed a significant safety risk to persons and property, without lawful intervention these disturbances will arise during the RNC as publicly stated in the print media.

Your Co-Affiliants have reviewed the following information pertaining to investigative efforts relative to the RNC.

Information obtained during the month of July, 2000 from electronic messages indicated that person(s) and/or groups are advocating Direct Action in the form of non-permitted marches, pledges of disrupting the city of Philadelphia by blockading the streets, blocking delegates, protestors chaining themselves to shuttle buses, references to "black bloc", and trashing police cars as ways of disrupting and/or delaying the RNC.

A review of an anarchist publication out of State College, Pennsylvania titled "Red Spirit" was conducted. The publications' Statement of Purpose advocates, in part, the total annihilation of government, including the police. Information has been obtained that anarchist activist will be in Philadelphia for the RNC.

Review of a Eugene Police Department bulletin detailing anarchist activity in Eugene, Oregon during the "Seven Week Revolt" in June 2000 was conducted. The report indicates that anarchist, during protest marches, had concealed gasoline soaked rags between the signs and stick/handles.

Anarchist had referred to these as tiki torches. The torches were made from bamboo sticks, approximately three feet long with a tin can taped to the end. A gasoline or oil soaked rag was placed inside the can and lit on

fire. This device was used to fling the burning rags at police during the protest. Additionally, references are made to anarchist using u-shaped Kryptonite locks to secure doors to businesses and financial institutions that the anarchist protest against and eggs filled with etching solution which contains buffered hydrofluoric acid, which can be harmful or fatal to humans, were thrown during the protest.

Information received on 07/26/00 confirmed prior information relative to the Black Bloc anarchist group. During a training session, members openly conveyed their intent is the destruction of property against capitalist enterprises and the destruction of police vehicles during the RNC. Training instructors demonstrated techniques to be used against police intervention during protest by breaking police holds, freeing persons taken into custody and group marches against police lines. Members further indicated that it is their intention to destroy property as an action, not a reaction during the protest. Training instructors provided training on jail solidarity in terms of giving false information to police. Training instructors were identified as K██████████, AKA Fuzzy Wuzzy, H██████████ and D██████████. H██████████, O██████████ and H██████████ are known members of PDAG.

CONVERGENCE CENTERS

The following paragraphs will detail a series of events and actions that have been revealed through this investigation that will illustrate the

significant role that several convergence sites, in the Philadelphia region, have played and are continuing to play in the organization, planning, control and training of several activist groups planning to engage in direct actions of civil disobedience during the time the RNC is being held in Philadelphia.

An extensive review was conducted of information obtained through investigative efforts to identify activities that support prior illegal protest activities. Based on this review, it was determined that persons engaged in illegal protests in Washington, D.C. have voiced a concern over police intervention at one specific "convergence center." Specifically, law enforcement authorities in Washington, D.C. had identified the protestors meeting at one central location and had store specially crafted tools or implements of a crime to be used during the protest. Through the single police intervention, the illegal activities were diminished. The information obtained indicates that multiple "convergence centers" are being utilized by the protestors to defeat police intervention during the RNC.

In a newspaper article titled "Philadelphians Host Activist Convergence" published in an activist newspaper called the, Unconvention dated July 29, 2000, S [REDACTED], of the Philadelphia Direct Action Group (PDAG), was quoted as saying, "We're learning lessons from the D.C. convergence, where the police shut down the convergence center before

the action... We are not going to put all our eggs in one basket."

This investigation is utilizing several Pennsylvania State Troopers in an undercover capacity that have infiltrated several of the activist groups planning to commit numerous illegal direct actions. Disclosure of this affidavit could endanger the lives and well being of these law enforcement officers.

Undercover law enforcement officers have revealed that on 07/24/00 at approximately 9:30 PM, information was conveyed to them by persons engaged in activist activities relative to the RNC who were meeting at the William Way Center, 1315 Spruce Street, Philadelphia, Pa. Undercover law enforcement officers were told to contact J [REDACTED] who was identified as the contact person at the Puppet Warehouse and was provided a telephone number of 215 [REDACTED]. Undercover law enforcement officers overheard a group of anarchist at 48th and Spruce streets, west Philadelphia state that the Puppet Warehouse, also known as Ministry of Puppetganda, located at 4100 Haverford Ave., Philadelphia, Pa. will be the action spot and everything is going to happen there.

On 07/27/00 undercover law enforcement officers arrived at the Puppet Warehouse to assist in the construction of props to be used during protest.

Undercover law enforcement officers observed 4 Schedule 40 PVC pipes,

approximately 3 feet long, 3 small rolls of chicken wire and 1 piece of plastic material resembling fencing. Said items were not there as of 30 minutes past midnight that morning when undercover law enforcement officers had departed the warehouse.

On 07/28/00 undercover law enforcement officers observed at the Puppet Warehouse a Dodge or Plymouth mini-van bearing New Jersey registration # [REDACTED], arrived at that location and approximately 15-20 pieces of 1 inch PVC pipe and bamboo sticks, approximately 8 feet in length, were unloaded. Undercover law enforcement officers also observed in the bed of a Ford pick up truck bearing Texas registration SRO199 approximately 15-20 additional pieces of PVC pipe and bamboo of the diameter and length previously described.

On 07/30/00 undercover law enforcement officers were at the Puppet Warehouse. Discussions were held that indicated that the puppets made at the Puppet Warehouse would be used as blockades. Specific reference was made to the "pig" and "Anti-Sam" puppets as blockades. Furthermore, discussions centered on using the puppets to hide "lock boxes."

On 08/01/00 at approximately 12:30 AM undercover law enforcement officers observed a Volkswagen Rabbit bearing Arizona registration

██████████ depart from 4100-Haverford Ave. loaded with bundles of PVC pipe and lock boxes. The vehicle was followed to A-Space, 4722 Baltimore Ave. Philadelphia, Pa. and 25-30 persons approached the vehicle.

On 08/01/00 at approximately 2:15 AM undercover law enforcement officers observed inside the Puppet Warehouse, 4100 Haverford Ave., lock boxes consisting of two plastic/rubber trash cans, approximately 40 gallons, black in color with exterior handles filled with 5" to 10 " of concrete from the top. Inside the center of the concrete was a piece of 4" Schedule 40 PVC pipe. Persons were practicing moving the concrete filled cans. Also observed on the second floor was a person assembling carbiners and u-bolts to sections of dog chain. A meeting was also being held, which consisted of 150 subjects, sporting Mohawk style haircuts, discussing organizing into 5 teams of 3 persons to engage in "lockdowns" in sectors of the city of Philadelphia. Observed with these people were trashcans containing concrete as described above. Undercover law enforcement officers also attended a meeting consisting of 70-80 persons inside the Puppet Warehouse. Persons discussed using the puppets to allow them to gain access to sectors of the city and then use them as blockades. Further discussions focused on tactical coordination of persons to arrive at Eakins Oval and 11th and Pine streets at 3:00 PM.

Present at the meeting was a person known by under cover law

enforcement officers as a Direct Action activist from Washington D.C. who was arranging to have the tunnel where delegates will be boarding buses at the PA Convention Center to be lockdown by blocking the entrances. Persons will arrive by vehicle at the designated location(s) already lock together in "lock boxes" in the rear of the vehicle so they can be deployed quickly from the from vehicle. Also discussed was the issue of criminal acts in that when someone wanted to participate in a criminal act, the protestors would chant "cheese" so people would clear away from the subject committing the act to avoid mass arrest. Persons indicated they would be throwing pies, bottles and cardboard boxes filled with water at the police. During the discussions the organizers of the protest indicated that the "direct actions" would occur between 3:00 P.M. and 5:00 P.M.

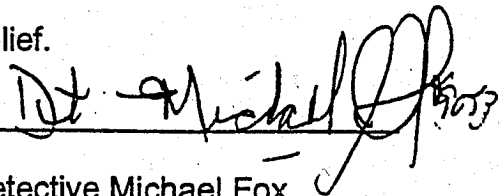
On 8/1/00, Highway Patrol officers observed a fourteen (14) foot U-Haul van, white and orange in color, KY tag# [REDACTED] leaving 4100 Haverford Avenue from the garage area. Refer to Search Warrant #97824

This affidavit has been reviewed and approved by Assistant District Attorney, Richard Negrin, Major Trials Unit.

Your Co-Affiants respectfully submit that probable cause exist to believe that the location of 4100 Haverford Ave., Philadelphia, Pa. is being utilized by various activist groups and their associates in committing offenses

involving the following sections enumerated under Title 18: Criminal Conspiracy; 903 & 901, Possessing Instruments of Crime; 907, Criminal Mischief; 3304, Disorderly Conduct: 5503.

Your Co-Affiants believe that all of the information in this Affidavit of Probable Cause to be true and correct to the best of their knowledge and belief.

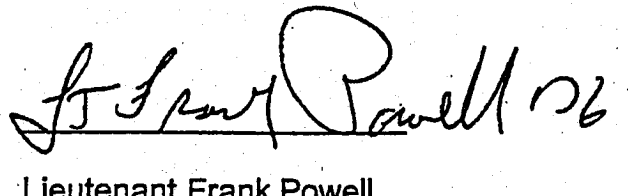


Detective Michael Fox

#9053 PR# 207080

Northeast Detectives

Philadelphia Police Department



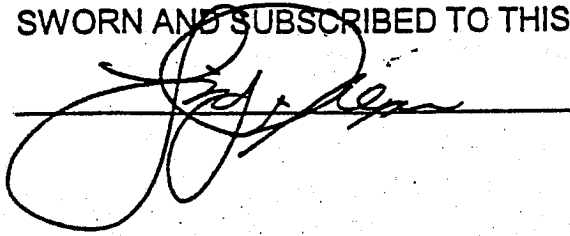
Lieutenant Frank Powell

#176 PR #114512

Northeast Detectives

Philadelphia Police Department

SWORN AND SUBSCRIBED TO THIS 1ST DAY OF AUGUST 2000.

A handwritten signature in black ink, written over a horizontal line. The signature is highly stylized and cursive, with large loops and flourishes.

Judge

REQUEST FOR SEALING ORDER

Your Co-Affiants respectfully request that the affidavit of probable cause be sealed for good cause shown in the following paragraphs pursuant to P.A. R.C.P. 20011:

As stated previously in this affidavit law enforcement authorities are currently conducting an ongoing criminal investigation into several activist groups planning to engage in illegal direct actions of civil disobedience in connection with The Republic National Convention currently being held in Philadelphia.

This investigation is utilizing several Pennsylvania State Troopers in an undercover capacity that have infiltrated several of the activist groups planning to commit numerous illegal direct actions. Disclosure of this affidavit could endanger the lives and well being of these law enforcement officers.

Through this current investigation law enforcement authorities have learned that the activist groups involved in these illegal activities have an extensive intelligence, counter-intelligence and communications network in place to coordinate and direct their planned illegal activities. They are cognizant of law enforcement efforts to thwart their illegal activities in the past. As a result of this knowledge they have shown to be covert and fluid in their planning of these illegal activities in an effort to thwart law enforcement's ability to stop them.

Disclosure of this affidavit of probable cause at this time would compromise law enforcement's ability to act in a proactive capacity to ensure that public safety and property damage is not endangered or committed as a result of the illegal activities planned by these groups.