

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

TRISTAN P. EGOLF, ADAM CLAYTON
WILLARD, JONATHAN A KOHLER,
DAVID JC OBRYANT, and BENJAMIN D.
KEELY,
Plaintiffs

v.

CHRISTOPHER WITMER, JAMES ELY,
CHRISTOPHER JONES, DEB KOLB,
GERALD KLING, D J. KLING
in their individual capacities as police
officers for East Lampeter Township;
LINDA GERON, BLAINE HERIZOG,
WAYNE KLINE in their individual capacities as
Pennsylvania State Troopers;
JOHN / JANE DOE 1 to 5, in their individual
capacities who are unknown state
actors;
JOHN / JANE DOE 6 to 10, in their individual
capacities who are unknown federal
employees, agents or actors;
Defendants

Civil Action No. _____

COMPLAINT

I. Introduction

1 Plaintiffs file this civil rights action against police officers of East Lampeter Township's Police Department, state troopers from the Pennsylvania State Police and others, all of whom violated the Plaintiffs' First, Fourth and Fourteenth Amendment Rights by illegally arresting them in order to suppress a peaceful, symbolic political protest against President Bush. Plaintiffs silently formed a human pyramid of bodies, clothed only in their underwear, to recreate the shameful, humiliating and inhumane treatment reportedly endured by prisoners at the Abu Ghraib prison in Iraq Plaintiffs formed their human pyramid in a traditional public forum along

the expected motorcade route in anticipation of President George W. Bush's arrival for a campaign appearance in East Lampeter Township, Lancaster County, Pennsylvania. Plaintiffs, however, were immediately arrested, physically removed from the scene and detained until after the President arrived and departed. Thereafter, Plaintiffs were charged with disorderly conduct, which charges were then withdrawn just prior to Plaintiffs' scheduled criminal trial. Plaintiffs now seek declaratory relief and monetary damages for the violation of their Constitutional rights.

II. Jurisdiction

2. This claim concerns the violation of civil rights and this Court has jurisdiction pursuant to 28 U.S.C. §§1331 and 1343. Remedies against state and municipal defendants are provided by 42 U.S.C. § 1983.

III. Venue

3. Venue properly lies in this Court pursuant to 28 U.S.C. § 1391 because the events that form the basis for this Complaint occurred in this district.

IV. Parties

4. Plaintiffs TRISTAN P. EGOLF, ADAM CLAYTON WILLARD, JONATHAN A. KOHLER, DAVID JC OBRYANT, and BENJAMIN D. KEELY are residents of the United States of America and the State of Pennsylvania.

5. Defendants CHRISTOPHER WITMER, JAMES ELY, CHRISTOPHER JONES, DEB KOLB, GERALD KLING and D J KLING are police officers employed by East Lampeter Township in its local municipal police force. At all relevant times, these police officers acted

under color of state law in depriving Plaintiffs of their Constitutional rights. They are all sued in their individual capacities (hereinafter "East Lampeter Township Police Officers").

6. Defendants LINDA GERON, BLAINE HERTZOG and WAYNE KLINE are state police troopers employed by the Pennsylvania State Police. At all relevant times these state troopers acted under color of state law in depriving Plaintiffs of their Constitutional rights. They are all sued in their individual capacities (hereinafter "Pennsylvania State Police Troopers")

7. Upon information and belief, Defendants JOHN and / or JANE DOE 1 to 5 were municipal law enforcement officers, state law enforcement officers or state actors whose identities are currently unknown, but it is believed they took actions under color of state law or conspired to do so in order to remove certain types of protestors and / or suppress particular messages from being expressed against the President. At all relevant times, their actions occurred and / or decisions were made under color of state law and were a substantial factor in depriving Plaintiffs of their Constitutional rights. They are all sued in their individual capacities.

8. Upon information and belief, Defendants JOHN and / or JANE DOE 6 to 10 were federal law enforcement officers, United States Secret Service agents and / or members of President George W. Bush's White House advance team, whose identities are currently unknown. It is believed they too acted to violate Plaintiffs' constitutional rights or conspired to do so in order to remove certain types of protestors and / or suppress particular messages from being expressed against the President. At all relevant times, their actions occurred and / or decisions were made in their capacities as federal employees or agents and were a substantial factor in the violation of Plaintiffs' constitutional rights. They are all sued in their individual capacities.

IV. Facts

9 On July 9, 2004, President George W. Bush was in Lancaster County, Pennsylvania to make a campaign appearance at Lapp Electrical Service, a business in East Lampeter Township.

10 Lapp Electrical Service is located along Route 340 near Smoketown, a small village in the Township.

11 The President was traveling in a bus and it was anticipated he would arrive at Lapp Electrical Service between 2:00 p.m. and 3:00 p.m.

12 In anticipation of the President's arrival, many people gathered along route 340 in areas that had been opened up to the public.

13 Plaintiffs gathered along route 340 near Lapp Electrical Service with the intention of expressing their views against the President and his policies, particularly the President's policies related to the war in Iraq.

14 At approximately 2:20 p.m., in anticipation of President Bush's motorcade procession along Route 340, Plaintiffs stripped down to their underwear and formed a human pyramid, carefully recreating the same humiliating act depicted in a now-famous photograph showing Iraqi prisoners at the Abu Ghraib prison.

15 Plaintiffs' symbolic act of forming a human pyramid was a silent and peaceful protest reflecting their disapproval of the U.S. military's actions in Iraq and of their disapproval of the President's policies and decisions.

16 While in the pyramid, the Plaintiffs remained silent and took no action whatsoever that was threatening to others, but simply created a symbolic statement.

17 As soon as Plaintiffs formed the human pyramid, John Doe, an individual believed to be with the Secret Service or associated with President Bush's advance team, signaled to law enforcement officials to remove and arrest the Plaintiffs.

18. Immediately thereafter, East Lampeter Police Officers and Pennsylvania State Police Troopers, including the individually named Defendants and other officers and troopers whose identities are presently unknown to Plaintiffs, began to forcefully pull the Plaintiffs from their human pyramid

19 The officers and troopers pulled and twisted the Plaintiffs' arms behind their backs, forced them to the ground, dug their knees into Plaintiffs' backs and proceeded to handcuff them

20 The officers and troopers then forced Plaintiffs to walk to an area shielded from Route 340 so that President Bush's motorcade could not see them when his bus arrived approximately ten to fifteen minutes later

21. After President Bush arrived at Lapp Electrical, the Plaintiffs were transported in handcuffs to the East Lampeter Township Police Station, where they were charged with disorderly conduct

22. Plaintiffs were held at the police station for approximately two (2) hours, where their hands were bound behind them, some in a painful manner, before finally being released.

23. It is believed and therefore averred, Plaintiffs were intentionally detained by Defendants at the police station until after President Bush had completed his campaign stop and left East Lampeter Township

24 The officers and troopers did not have probable cause to seize, forcibly remove and arrest the Plaintiffs.

25. The criminal citations filed against the Plaintiffs stated that they were being charged with disorderly conduct because each Plaintiff “did strip down to his underwear and build a human pyramid in protest of President Bush ” See copy of Citations attached hereto as Exhibit “A.”

26. A hearing on the criminal citations was then scheduled for Monday, October 18, 2004

27. On Friday, October 15, 2004, the Lancaster County District Attorney’s office withdrew all of the charges, stating in a press release that Plaintiffs had not committed any crimes, that it was not possible to prosecute the Plaintiffs for disorderly conduct and that it was clear the First Amendment protected Plaintiffs’ symbolic protest against the President.

28. It is believed and therefore averred that the Defendants, acting under color of state law or in their capacity as federal employees, decided or agreed upon a plan or policy to arrest and remove individuals who were demonstrating against President Bush’s motorcade procession whenever individuals engaged in nontraditional forms of symbolic expression or protest that called particular attention to the President or the President’s policies and decisions regardless of whether there was probable cause to arrest and charge such individuals or whether the demonstration was protected by the First Amendment

29. The actions of the Defendants in forcibly removing and arresting Plaintiffs without probable cause while they were engaged in a peaceful, silent protest of the President—which arrests appear to have been done for the sole purpose of suppressing Plaintiffs’ symbolic protest against the President—constitutes a violation of Plaintiffs’ clearly established First Amendment rights and represents willful, wanton, malicious, intentional, outrageous, deliberate and / or egregious conduct

V. Causes of Action

COUNT I

Plaintiffs v. East Lampeter Police Officers,
Pennsylvania State Police Troopers and John / Jane Doe 1 to 5
(42 U.S.C. § 1983 for violating the First and Fourteenth Amendments)

30. Plaintiffs incorporate by reference paragraphs 1 through 29 as if fully set forth herein

31. Defendants East Lampeter Police Officers, Pennsylvania State Police Troopers and Defendants John / Jane Doe 1 to 5 are state actors who acted under color of state law in a manner that deprived Plaintiffs of their Constitutional rights to free speech as guaranteed by the First and Fourteenth Amendment

32. The actions of the Defendants violated clearly established federal constitutional rights of the Plaintiffs

33. As a proximate result of the Defendants' Constitutional violations, Plaintiffs have suffered the following injuries and damages:

a. Violation of their constitutional rights under the First and Fourteenth Amendments to the United States Constitution;

b. Emotional distress and physical pain as a result of the aforesaid actions of the Defendants

c. Costs and expenses arising out of Defendants' actions.

34. Plaintiffs respectfully request your Honorable Court to grant the relief requested below

COUNT II

Plaintiffs v. East Lampeter Police Officers,
Pennsylvania State Police Troopers and John / Jane Doe 1 to 5
(42 U.S.C. § 1983 for violating the Fourth and Fourteenth Amendments)

35. Plaintiffs incorporate by reference paragraphs 1 through 29 as if fully set forth herein.

36. Defendants East Lampeter Police Officers, Pennsylvania State Police Troopers and Defendants John / Jane Doe 1 to 5 are state actors who acted under color of state law in a manner that deprived Plaintiffs of their Constitutional rights to be free from improper seizures, arrests, detentions and malicious prosecutions as guaranteed by the Fourth and Fourteenth Amendment

37. The actions of the Defendants violated clearly established federal constitutional rights of the Plaintiffs.

38. As a proximate result of the Defendants' Constitutional violations, Plaintiffs have suffered the following injuries and damages:

a. Violation of their constitutional rights under the Fourth and Fourteenth Amendments to the United States Constitution;

b. Emotional distress and physical pain as a result of the aforesaid actions of the Defendants.

c. Costs and expenses arising out of Defendants' actions.

39. Plaintiffs respectfully request your Honorable Court to grant the relief requested below

COUNT III

Plaintiffs v. John / Jane Doe 6 to 10
(*Bivens* action for violating the First Amendment)

40. Plaintiffs incorporate by reference paragraphs 1 through 29 as if fully set forth herein

41. Defendants John / Jane Doe 6 to 10 are federal employees, agents or actors who deprived Plaintiffs of their Constitutional rights to free speech as guaranteed by the First Amendment.

42. The actions of the Defendants violated clearly established federal constitutional rights of the Plaintiffs.

43. As a proximate result of the Defendants' Constitutional violations, Plaintiffs have suffered the following injuries and damages:

a. Violation of their constitutional rights under the First Amendment to the United States Constitution;

b. Emotional distress and physical pain as a result of the aforesaid actions of the Defendants.

c. Costs and expenses arising out of Defendants' actions.

44. Plaintiffs respectfully request your Honorable Court to grant the relief requested below

COUNT IV

Plaintiffs v. All Defendants

(42 U.S.C. § 1985 action for a conspiracy to violate Plaintiffs' Constitutional rights)

45. Plaintiffs incorporate by reference paragraphs 1 through 29 as if fully set forth herein.

46. It is believed based on similar instances around the Country that federal employees, agents or directors and / or other individuals involved in the President's reelection campaign, may have coordinated and implemented a plan to utilize law enforcement officials to arrest and remove protestors in order to suppress certain types of demonstrations and messages from being communicated in violation of the protestors' Constitutional rights.

47 It is believed and therefore averred that Defendants entered into an agreement or understanding among themselves with possible direction from others that individuals who engaged in certain types of expression against the President or his policies would be arrested and forcibly removed in order to suppress that viewpoint or message from being communicated at a time and in a forum that may detract from the President

48 As a proximate result of the Defendants' conspiracy to deprive Plaintiffs of their Constitutional rights, Plaintiffs have suffered the following injuries and damages:

a Violation of their constitutional rights under the First, Fourth and Fourteenth Amendments to the United States Constitution;

b Emotional distress and physical pain as a result of the aforesaid actions of the Defendants

c Costs and expenses arising out of Defendants' actions.

49 Plaintiffs respectfully request your Honorable Court to grant the relief requested below.

VI. Relief Requested

WHEREFORE, Plaintiffs request the following relief:

a Declare that Defendants' actions and conduct that led to the physical removal, arrest and filing of criminal charges against Plaintiffs were in violation of the First and Fourteenth Amendments of the United States Constitution;

b Grant Plaintiffs damages for violation of their Constitutional rights and for the emotional and physical harm they suffered as a result of this incident;

c Award Plaintiffs punitive damages as against the individual Defendants to the extent that their liability is based upon reprehensible actions and / or inaction undertaken in their individual capacities, in such amounts as the jury determines;

d Award the Plaintiffs prejudgment interest, reasonable attorneys' fees and costs as permitted by law; and

e Award such other and further relief, as this Court may deem appropriate

Respectfully submitted,

GIBBEL, KRAYBILL & HESS

By: 

Melvin H. Hess
J. Dwight Yoder
Attorneys for Plaintiff
41 East Orange Street
Lancaster, PA 17602
(717) 291-1700
Sup. Ct. Atty ID. #23225
Sup. Ct. Atty ID. #81985

AMERICAN CIVIL LIBERTIES
FOUNDATION OF PENNSYLVANIA

By: 

Witold J. Walczak
PA ID No. 62976
313 Atwood Street
Pittsburgh, PA 15213
412-681-7864

Paula Knudsen
PA ID. No. 87607
105 North Front Street, Suite 225
Harrisburg, PA 17101
(717) 236-6827

EXHIBIT “A”



COMMONWEALTH OF PENNSYLVANIA

CITATION NO

NON-TRAFFIC CITATION P4471636-1

1. Magisterial District Number 02-3-02		2. Docket Number NT-0000-376-04		3. Social Security Number	
4. Address of Magisterial District Office 15 Geist Road, Lancaster, PA 17601 (717) 656-2191				5. Driver's number 22881941	6. State <input checked="" type="checkbox"/> PA
7. Defendant's Name - First Middle Last TRISTAN P EGOLF					
8. Defendant's Address (Street-City-State-Zip Code)					
9. Race/Ethnicity (W) <input checked="" type="checkbox"/> White (B) <input type="checkbox"/> Black (I) <input type="checkbox"/> Native American		10. Sex (M) <input checked="" type="checkbox"/> Male (F) <input type="checkbox"/> Female		11. Date of Birth (MM/DD/YY)	
12. Resident Status (R) <input type="checkbox"/> Resident (N) <input checked="" type="checkbox"/> Non-Resident (U) <input type="checkbox"/> Unknown		13. Case instituted by (O) <input checked="" type="checkbox"/> On-View Arrest (C) <input type="checkbox"/> Citation/Summons			
14. JUVENILE <input type="checkbox"/> Yes <input type="checkbox"/> No		15. Parents Notified <input type="checkbox"/> Yes <input type="checkbox"/> No		16. Parent's Name	
17. Date Notified					
18. Time					
19. Charge <input checked="" type="checkbox"/> Disorderly Conduct <input type="checkbox"/> Harassment <input type="checkbox"/> Retail Theft <input type="checkbox"/> Other <input type="checkbox"/> Criminal Trespass <input type="checkbox"/> Public Drunkenness <input type="checkbox"/> Purchase, Consumption, Possession or Transportation of Liquor or Malt or Brewed Beverages <input type="checkbox"/> Theft of Services <input type="checkbox"/> Scattering Rubbish <input type="checkbox"/> Criminal Mischief					
20. Nature of Offense A PERSON IS GUILTY OF DISORDERLY CONDUCT IF WITH THE INTENT TO CAUSE PUBLIC INCONVENIENCE OR ALARM, OR RECKLESSLY CREATING A RISK THEREOF, HE CREATES A HAZARDOUS OR PHYSICALLY OFFENSIVE CONDITION BY ANY ACT WHICH SERVES NO LEGITIMATE PURPOSE OF THE ACT, TO WIT: DEF DID STRIP DOWN TO HIS					
21. Pa. Code CRIMES		22. CRIMES CODE TITLE 18			
23. SECTION 5503		24. SUB SEC. 2, 4			
25. FINE		26. COSTS			
27. J.C.P./A.T.J.		10.00			
28. TOTAL DUE		\$			
29. Lab Services Requested <input type="checkbox"/>		30. Date 7-9-04		31. Time 1427	
32. Day FRI		33. City-Twp-Boro EAST LANPETER TWP		34. Code 215	
35. Zone 2		36. Location 2369 OLD PHILADELPHIA PIKE (YARDERS)		37. County Lancaster	
38. County Code 36		39. Defendant's Signature - Acknowledges Receipt of Citation X [Signature]		40. Date 7-9-04	
41. Issued <input checked="" type="checkbox"/> Issued <input type="checkbox"/> Filed		42. I verify that the facts set forth in this citation are true to the best of my knowledge, information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.			
OFFICER'S SIGNATURE [Signature]		BADGE NUMBER 20		ORI NUMBER PA 0364000	
43. Station Address East Lampeter Twp. Police, 2205 Old Philadelphia Pike, Lancaster, PA 17602					
44. Offense Code		45. Property Record No.		46. Systems Code	
47. Initial Report <input type="checkbox"/>		48. Attention LCE <input type="checkbox"/>		49. Incident No. 0407014329	
50. Victim's Name COMMONWEALTH		51. Date of Birth (MM/DD/YY)		52. Sex	
53. Race/Ethnicity		54. Victim's Address (Street-City-State-Zip Code)		55. Phone Number	
56. Remarks / Subpoena List UNDERWEAR AND BUILD A HUMAN PYRAMID IN PROTEST OF PRESIDENT BUSH WITHDRAWN 10-15-04 CT James EJP AS per D.A. office DOE - WISH YOU WERE HERE					
57. Supv. Init.		58. Badge No.			



COMMONWEALTH OF PENNSYLVANIA

CITATION NO

NON-TRAFFIC CITATION P4471621-0

1. Magisterial District Number

02-3-02

2. Docket Number

NT-0000375-04

3. Social Security Number

4. Address of Magisterial District Office

15 Geist Road, Lancaster, PA 17601 (717) 556-2191

5. Driver's Number

26364016

6. State

PA

7. Defendant's Name - First

ADAM

Middle

Last

CLAYTON

WILLARD

8. Defendant's Address (Street, State, Zip Code)

9. Race/ethnicity

(W) ☒ White(B) ☐ Black(I) ☐ Native American(A) ☐ Asian(H) ☐ Hispanic(U) ☐ Unknown

10. Sex

(M) ☒ Male(F) ☐ Female

11. Date of Birth (MM/DD/YY)

12. Case Instituted by

(R) ☐ Resident(N) ☒ Non-Resident(U) ☐ Unknown

13. Case Instituted by

(O) ☒ On-View Arrest(C) ☐ Citation/Summons

14. JUVENILE

☐ YES

15. Parents Notified

☐ YES

16. Parent's Name

17. Date Notified

18. Time

19. Charge

☒ Disorderly Conduct☐ Harassment☐ Retail Theft☐ Other☐ Criminal Trespass☐ Public Drunkenness☐ Purchase Consumption, Possession or Transportation of Liquor or Malt or Brewed Beverages☐ Theft of Services☐ Scattering Rubbish☐ Criminal Mischief

20. Nature of Offense

ARSON IS GUILTY OF DISORDERLY CONDUCT

21. Pa. Code

CRIMES

22. CRIMES CODE TITLE 18

☐

IF WITH THE INTENT TO CAUSE PUBLIC INCONVENIENCE OR

23. SECTION

5503

24. SUB SEC.

2, 4

ALARM, OR RECKLESSLY CREATING A RISK THEREOF, HE CREATES

25. FINE

26. COSTS

A HAZARDOUS OR PHYSICALLY OFFENSIVE CONDITION BY ANY ACT

27. J.C.P./A.T.J.

10.00

WHICH SERVES NO LEGITIMATE PURPOSE OF THE ACT, TO WIT

28. TOTAL DUE

\$

OFF DID STRIP DOWN TO HIS

29. Code

215

30. Zone

2

7-9-04

1417

FRI

EAST LANCASTER TWP.

2369 OLD PHILADELPHIA PIKE (YODERS)

37. County

Lancaster

38. County Code

36

40. Date

7-9-04

41. Issued

☒

42. Filed

☐

43. Filed on info. received

☐

OFFICER'S SIGNATURE

CRISTINA R. WITTE

BADGE NUMBER

20

ORI NUMBER

PA 0364000

43. Station Address

East Lampeter Twp. Police, 2205 Old Philadelphia Pike, Lancaster, PA 17602

44. Offense Code

45. Property Record No.

46. Systems Code

47. Initial Report

48. Attention LCE

49. Incident No.

0407-014329

50. Victim's Name

COMMONWEALTH

51. Date of Birth (MM/DD/YY)

52. Sex

53. Race/Ethnicity

54. Victim's Address (Street-City-State-Zip Code)

55. Phone Number

56. Remarks / Subpoena List

- UNDERWEAR AND BUILD A HUMAN PYRAMID IN PROTEST

OF PRESIDENT BUSH

10-15-04 WITHDRAWN CT from ECP

ASPER DA OFFICE

DOE - COFFEE CO.

P4471621-0

57. Supp. Init.

Badge No.



COMMONWEALTH OF PENNSYLVANIA

CITATION NO.

NON-TRAFFIC CITATION P4471635-0

1. Magisterial District Number 02-3-02	2. Docket Number NT-0000377-84	3. Social Security Number
4. Address of Magisterial District Office 15 Geist Road, Lancaster, PA 17601 (717) 656-2191		5. Driver's Test No. 27330905
6. State <input checked="" type="checkbox"/> PA		
7. Defendant's Name - First Middle Last SONATHAN A KOHLER		
8. Defendant's Street-City-State-Zip Code		

(W) <input checked="" type="checkbox"/> White (B) <input type="checkbox"/> Black (I) <input type="checkbox"/> Native American	(A) <input type="checkbox"/> Asian (H) <input type="checkbox"/> Hispanic (U) <input type="checkbox"/> Unknown	(M) <input checked="" type="checkbox"/> Male (F) <input type="checkbox"/> Female	11. Date of Birth (MM/DD/YY)	12. Resident Status (R) <input type="checkbox"/> Resident (N) <input checked="" type="checkbox"/> Non-Resident (U) <input type="checkbox"/> Unknown	13. Case Instituted by (O) <input checked="" type="checkbox"/> On-View Arrest (C) <input type="checkbox"/> Citation/Summons
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14. JUVENILE <input type="checkbox"/> YES <input type="checkbox"/> NO	15. Parents Notified <input type="checkbox"/> YES <input type="checkbox"/> NO	16. Parent's Name	17. Date Notified	18. Time
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19. Charge <input checked="" type="checkbox"/> Disorderly Conduct <input type="checkbox"/> Harassment <input type="checkbox"/> Retail Theft <input type="checkbox"/> Other	<input type="checkbox"/> Criminal Trespass <input type="checkbox"/> Public Drunkenness <input type="checkbox"/> Purchase Consumption Possession or Transportation of Liquor or Malt or Brewed Beverages	<input type="checkbox"/> Theft of Services <input type="checkbox"/> Scattering Rubbish	<input type="checkbox"/> Criminal Mischief
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20. Nature of Offense DEFENDANT PERSON IS GUILTY OF DISORDERLY CONDUCT IF WITH THE INTENT TO CAUSE PUBLIC INCONVENIENCE OR ALARM OR RECKLESSLY CAUSING A RISK THEREOF, HE CREATES A HAZARDOUS OR PHYSICALLY OFFENSIVE CONDITION BY ANY ACT WHICH SERVES NO LEGITIMATE PURPOSE OF THE ACTOR, TO WIT: DEF. 1111	21. Pa. Code CRIMES	22. CRIMES CODE TITLE 18 <input type="checkbox"/>
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23. SECTION 5503	24. SUB SEC. 2,4
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25. FINE	26. COSTS
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27. J.C.P./A.T.L.	10.00
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28. TOTAL DUE \$	29. Lab Services Requested <input type="checkbox"/>
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30. Date 7-9-04	31. Time 1427	32. Day FRI	33. City/Twp./Boro EAST LANCASTER TWP.	34. Code 215	35. Zone 2
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36. Location 2369 PHILADELPHIA PK. (YONERS)	37. County Lancaster	38. County Code 36
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39. Defendant's Signature [Signature]	40. Date 7-9-04	41. <input checked="" type="checkbox"/> Issued <input type="checkbox"/> Filed <input checked="" type="checkbox"/> Filed on Info. received
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42. I certify that the facts set forth in this citation are true to the best of my knowledge, information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.		
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OFFICER'S SIGNATURE [Signature]	BADGE NUMBER 20	ORI NUMBER PA-0364000
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43. Station Address East Lampeter Twp. Police, 2205 Old Philadelphia Pike, Lancaster, PA 17602		
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44. Offense Code	45. Property Record No.	46. Systems Code	47. <input type="checkbox"/> Initial Report	48. <input type="checkbox"/> Attention LCE	49. Incident No. 0407-014329
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50. Victim's Name COMMONWEALTH	51. Date of Birth (MM/DD/YY)	52. Sex	53. Race/Ethnicity
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54. Victim's Address (Street-City-State-Zip Code)	55. Phone Number
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56. Remarks / Subpoena List STRIP DOWN TO HIS UNDERWEAR AND BUILD A HUMAN PYRAMID IN PROTEST OF PRESIDENT BUSH
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10-15-04 with David C. James Esq

As per D.A. office

DE WISH YOU WERE HERE

P4471635-0

57. Supv. Init.	58. Badge No.
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COMMONWEALTH OF PENNSYLVANIA

CITATION NO.

NON-TRAFFIC CITATION P4471634-6

1. Magisterial District Number 02-3-02		2. Docket Number NTE-0000373-04		3. Social Security Number	
4. Address of Magisterial District Office 15 Geist Road, Lancaster, PA 17601 (717) 656-2191				5. Driver's Number 26399544	
6. Defendant's Name - First DAVID		Middle J C		Last OBRYANT	
8. Defendant's Address (Street-City-State-Zip)					
9. Race/Ethnicity (W) <input type="checkbox"/> White (A) <input type="checkbox"/> Asian (M) <input checked="" type="checkbox"/> Male (MM/DD/YY) (B) <input checked="" type="checkbox"/> Black (H) <input type="checkbox"/> Hispanic (F) <input type="checkbox"/> Female (I) <input type="checkbox"/> Native American (U) <input type="checkbox"/> Unknown					
10. Juvenile <input type="checkbox"/> Yes		11. Parents Notified <input type="checkbox"/> Yes		12. Case Instituted by (O) <input checked="" type="checkbox"/> On-View Arrest (C) <input type="checkbox"/> Citation/Summons	
13. Charge <input checked="" type="checkbox"/> Disorderly Conduct <input type="checkbox"/> Criminal Trespass <input type="checkbox"/> Theft of Services <input type="checkbox"/> Criminal Mischief <input type="checkbox"/> Harassment <input type="checkbox"/> Public Drunkenness <input type="checkbox"/> Scattering Rubbish <input type="checkbox"/> Retail Theft <input type="checkbox"/> Purchase, Consumption, Possession or Transportation of Liquor or Malt or Brewed Beverages <input type="checkbox"/> Other					
20. Nature of Offense A PERSON IS GUILTY OF DISORDERLY CONDUCT IF WITH THE INTENT TO CAUSE PUBLIC INCONVENIENCE OR ALARM OR RECKLESSLY CAUSING ARISE THEREOF HE CREATES A HAZARDOUS OR PHYSICALLY OFFENSIVE CONDITION BY ANY ACT WHICH SERVES NO LEGITIMATE PURPOSE OF THE ACTOR TO WIT: DEF. DROD STRIP DOWN					
21. Pa. Code		22. CRIMES CODE TITLE 18			
23. SECTION 5503		24. SUB SEC. 2, 4			
25. FINE		26. COSTS			
27. J.C.P.A.T.J.		28. TOTAL DUE \$ 10.00			
29. Lab Services Requested		30. Date 7-9-04			
31. Time 1427		32. Day FRI		33. City-Twp-Boro EAST LAMPETER TWP.	
34. Code 215		35. Zone 2		36. County Lancaster	
37. County Code 35		38. County Code			
39. Defendant's Signature - Acknowledges Receipt of Citation X DAVID OBRYANT					
40. Date 7-9-04					
41. Issued <input checked="" type="checkbox"/> Fined <input type="checkbox"/> Filed on Info. received <input checked="" type="checkbox"/>					
42. I verify that the facts set forth in this citation are true to the best of my knowledge, information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities. OFFICER'S SIGNATURE BADGE NUMBER 20 ORI NUMBER PA-0364000					
43. Station Address East Lampeter Twp. Police, 2205 Old Philadelphia Pike, Lancaster, PA 17602					
44. Offense Code		45. Property Record No.		46. Systems Code	
47. Initial Report		48. Attention LCE		49. Incident No. 0407-014327	
50. Victim's Name		51. Date of Birth (MM/DD/YY)		52. Sex	
53. Race/Ethnicity		54. Victim's Address (Street-City-State-Zip Code)			
55. Phone Number		56. Remarks / Subpoena List TO HIS UNDERWEAR AND BUILD A HUMAN PYRAMID IN PROTEST OF PRESIDENT BUSH 10-15-04 WITHDRAWN BY JAMES C. AS PER DA OFFICE PDE N/A			
57. Supv. Init.		58. Badge No. P4471634-6			



COMMONWEALTH OF PENNSYLVANIA

CITATION NO.

NON-TRAFFIC CITATION P 4471632-4

1. Magisterial District Number 02-3-02		2. Docket Number NT-0000372-04		3. Serial Security Number	
4. Address of Magisterial District Office 15 Geist Road, Lancaster, PA 17601 (717) 656-2191			5. Driver's Number 25772635		6. State <input checked="" type="checkbox"/> PA
7. Defendant's Name - First Middle Last BENJAMIN D KEELY					
8. Address (Street-City-State-Zip Code)					
9. (W) <input checked="" type="checkbox"/> White (B) <input type="checkbox"/> Black (I) <input type="checkbox"/> Native American		(A) <input type="checkbox"/> Asian (H) <input type="checkbox"/> Hispanic (U) <input type="checkbox"/> Unknown		10. Sex (M) <input checked="" type="checkbox"/> Male (F) <input type="checkbox"/> Female	
11. Date of Birth (MM/DD/YY)		12. Resident Status (R) <input type="checkbox"/> Resident (N) <input checked="" type="checkbox"/> Non-Resident (U) <input type="checkbox"/> Unknown		13. Case Instituted by (O) <input checked="" type="checkbox"/> On-View Arrest (C) <input type="checkbox"/> Citation/Summons	
14. JUVENILE <input type="checkbox"/> Yes <input type="checkbox"/> No		15. Parents Notified <input type="checkbox"/> Yes <input type="checkbox"/> No		16. Parent's Name	
19. Charge <input checked="" type="checkbox"/> Disorderly Conduct <input type="checkbox"/> Harassment <input type="checkbox"/> Retail Theft <input type="checkbox"/> Other					
20. Nature of Offense A PERSON IS GUILTY OF DISORDERLY CONDUCT IF WITH THE INTENT TO CAUSE PUBLIC INCONVENIENCE OR ANXIETY OR RECKLESSLY CREATING A RISK THEREOF HE CREATES A HAZARDOUS OR PHYSICALLY OFFENSIVE CONDITION BY ANY ACT WHICH SERVES NO LEGITIMATE PURPOSE OF THE ACTOR TO WIT:					
21. Pa. Code CRIMES					
22. CRIMES CODE TITLE 18 SECTION 5503 SUB SEC. 2, 4					
23. FINE 10.00					
24. COSTS					
25. J.C.P./A.T.J.					
26. TOTAL DUE \$					
27. Lab Services Requested					
28. Code 215					
29. Zone 2					
30. Date 7-9-04					
31. Time 1427					
32. Day FRI					
33. City-Twp-Boro EAST LANCASTER TWP					
34. Location 2205 OLD PHILADELPHIA PIKE (YONERS)					
35. County Lancaster					
36. County Code 36					
37. Date 7-9-04					
38. Issued <input checked="" type="checkbox"/> Issued <input type="checkbox"/> Filed					
39. Defendant's Signature - Acknowledges Receipt of Citation X Benjamin D Keely					
40. Date 7-9-04					
41. Filed on Info. received					
42. I verify that the facts set forth in this citation are true to the best of my knowledge, information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.					
OFFICER'S SIGNATURE [Signature]					
BADGE NUMBER 20					
ORI NUMBER PA-0364000					
43. Station Address East Lampeter Twp. Police, 2205 Old Philadelphia Pike, Lancaster, PA 17602					
44. Offense Code					
45. Property Record No.					
46. Systems Code					
47. Initial Report <input type="checkbox"/> Initial Report <input type="checkbox"/> Attention LCE					
48. Incident No. 0407-014329					
49. Victim's Name					
50. Date of Birth (MM/DD/YY)					
51. Sex					
52. Race/Ethnicity					
53. Phone Number					
54. Victim's Address (Street-City-State-Zip Code)					
55. Remarks / Subpoena List DEF AND STRIP DOWN TO HIS UNDERWEAR AND BUILD A HUMAN PYRAMID IN HONOR OF PRESIDENT BUSH. 10-15-04 WITHDRAWN BY James Ely AS per DA office					
56. Date 07-04					
57. Supv. Init.					
58. Badge No.					