



COMPLAINT FOR SEARCH WARRANT

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF MONTGOMERY : SS

I, the undersigned, do hereby state under Oath or Affirmation administered according to law that my name is Corporal Robert J. Bugjo of the Pennsylvania State Police

Further, that I have probable cause to believe that there is now being concealed certain property, namely: (here, describe the property in detail) any device and/or apparatus, attachments, wiring and any other associated paraphernalia which can be used in the interception of telephone communications.

which is (are): (here give basis for the search and seizure thereof; i.e., whether it is evidence, fruits or instrumentalities of a crime. State the place, the date and nature of crime, and how the items to be seized relate thereto. If contraband, state so.) illegal and in violation of Pennsylvania Penal Code, §898.1, Making, Possessing, Transferring a Device Designed for Theft of Telecommunications Service; and Act No. 411, July 16, 1957, P.L. 956, Interception of Telephone and Telegraph Communications

On the person of: (give name, if no name, give description)

In the premises known and described as: (here describe in detail the place to be searched). the area immediately above Room 175 and Room 175 of the George Washington Motor Lodge located at King of Prussia, Pennsylvania; said room identified by the number on the door and is the front part of a one and one-half story frame dwelling

and situated at Route 202
in the Township of Upper Merion of Montgomery, County of King of Prussia, Pennsylvania, and in the possession of and occupied by one Stanley Knotts who said room was registered to.

That the facts upon which the affiant relies and verily believes establish probable cause for the issuance of a search warrant are as follows:

[IMPORTANT - Instructions:

1. . Set forth all Facts which tend to show probability that property is located at place to be searched, in chronological order.
2. If hearsay information is a basis, state:
 - (a) what informant said, when, to whom.
 - (b) facts which show informant knows what he said is true.
 - (c) why the affiant believes the informant.

On the person of: (give name, if no name, give description)

In the premises known and described as: (here describe in detail the place to be searched). area immediately above Room 181 and Room 181 of the George Washington Motor Lodge located at King of Prussia, Pennsylvania; said room identified by the number on the door and is the front part of a one and one-half story frame dwelling

and situated at Route 202

in the Township of Upper Merion of Montgomery, County of King of Prussia, Pennsylvania, and in the possession of and occupied by _____.

That the facts upon which the affiant relies and verily believes establish probable cause for the issuance of a search warrant are as follows:

[IMPORTANT - Instructions:

1. Set forth all Facts which tend to show probability that property is located at place to be searched, in chronological order.
2. If hearsay information is a basis, state:
 - (a) what informant said, when, to whom.
 - (b) facts which show informant knows what he said is true.
 - (c) why the affiant believes the informant.

On the person of: (give name, if no name, give description)

In the premises known and described as: (here describe in detail the place to be searched). a two-door Buick Sedan,
black vinyl top and brown body, Pa. license No. 4J1-730, manufacturer's
serial number 4L57H2Y197689 issued to Nicholas Pratkano, 4642 Roosevelt
Boulevard, Philadelphia, Pennsylvania

and situated at _____
in the _____ of _____, County of
_____, Pennsylvania, and in the possession
of and occupied by _____.

That the facts upon which the affiant relies and verily believes establish probable cause for the issuance of a search warrant are as follows:

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1. Set forth all Facts which tend to show probability that property is located at place to be searched, in chronological order.
2. If hearsay information is a basis, state:
 - (a) what informant said, when, to whom.
 - (b) facts which show informant knows what he said is true.
 - (c) why the affiant believes the informant.

On the person of: (give name, if no name, give description)

In the premises known and described as: (here describe in detail the place to be searched). a four-door Mercury Sedan, dark green over light green, temporary license No. 1619-508, manufacturer's serial number 3B445511441, Inspection Sticker No. 2287324, issued to David Ertley, Inc., 310 Market Street, Kingston, Pennsylvania

and situated at parking lot of George Washington Motor Lodge, Route 202, in the Township of Upper Merion of Montgomery, County of King of Prussia, Pennsylvania, and in the possession of and occupied by issued to David Ertley, Inc.

That the facts upon which the affiant relies and verily believes establish probable cause for the issuance of a search warrant are as follows:

[IMPORTANT - Instructions:

1. . Set forth all Facts which tend to show probability that property is located at place to be searched, in chronological order.
2. If hearsay information is a basis, state:
 - (a) what informant said, when, to whom.
 - (b) facts which show informant knows what he said is true.
 - (c) why the affiant believes the informant.

1. At about 3:30 p.m. on date of November 27, 1972, John Benjamin Sherr, white male, aged 28, the maintenance engineer at the George Washington Motor Lodge, King of Prussia, Upper Merion Township, Montgomery County, Pennsylvania, had occasion to check on the loud fan motor at the George Washington Motor Lodge in Room 178. While checking Room 178, the aforementioned John Sherr looked into a transom in the ceiling and observed a white male in the process of entering a room in the approximate area of Room 175 from the overhead rafters.

2. A subsequent check by officials of the George Washington Motor Lodge of the area in the vicinity of Room 175 revealed only one male registered in the end wing on the first level. The only male guest was registered in Room 175. Subsequently, John Sherr and Assistant Manager Ray Richards went to Room 175. After knocking on the door, Ray Richards and John Sherr observed a white male standing at the window of Room 175. Mr. Richards advised the occupant of Room 175 that they were there to check for a loud fan motor which was causing excessive noise. The occupant of Room 175 without opening the door or window and keeping the drapes almost closed related that the only noise that he heard was from Room 176. NOTE: Room 176 was occupied by a white female with two children.

3. Officials in the George Washington Motor Lodge then checked the registration form of the guest registered in Room 175 and found that a Stanley Knotts from 485 First Avenue, Kingston, Pennsylvania, was registered in the aforementioned room. That the said Mr. Knotts gave the firm name of Agway in Kingston, Pennsylvania, Registration No. 175-476 on a Buick. Mr. Joseph Monahan, an official of George Washington Motor Lodge then made an inquiry in Kingston, Pennsylvania and found that there was no Agway Corporation in Kingston. A subsequent check made on the registration number given by the said Stanley Knotts revealed that no such number was recorded in the Department of Motor Vehicles in Harrisburg, Pennsylvania.

4. Mr. David J. Greth, sales manager of George Washington Motor Lodge at or about the hour of 5:30 p.m. observed two unknown white males enter a Plymouth Sedan which was backed up against one of the rooms of the Motel on the west side of Room 175. These two men at that time were carrying black boxes of the type used by TV repairmen. Both men were dressed in windbreaker-type jackets--one wearing a baseball cap and both being between the ages of 35 and 45. Mr. Greth noticed that both men were visibly shaken when Mr. Greth observed them and that they waited until Mr. Greth had passed their car before entering same.

5. At about the hour of 7 p.m., Mr. Joseph Monahan and David J. Greth, both officials of the George Washington Motor Lodge related the foregoing unusual circumstances to Sgt. Mathew Hunt of the Pennsylvania State Police. At about the hour of 8:15 p.m. Joseph Monahan and David J. Greth as well as Corporal Charles J. Todd, Trooper Albert Pistone, Trooper Frank McAndrew, Sgt. Mathew A. Hunt and John Benjamin Sherr entered Room 181 of the George Washington Motor Lodge. A step ladder was used to gain entrance by way of a transom to the crawl space immediately above Room 181. Sgt. Mathew A. Hunt and Trooper Francis McAndrew made a complete search of the crawl space area between Room 181 and Room 175. The search revealed that red and green wires had been spliced in into gray Bell Telephone lines entering into Rooms 208 (occupied by Trooper Anthony Caldonetti), Room 213 (occupied by Corporal Charles J. Todd), and Room 214 (occupied by Sergeant Mathew A. Hunt). There was also present excess wiring at both ends of Room 175 and Room 181.

6. At about the hour of 8:55 a.m. on the date of November 28, 1972, Jill Karen Kauler a white female, age 20, desk clerk at the George Washington Motor Lodge, related to Sgt. Mathew A. Hunt that an unknown white male registered in Room 175 at his request on Thanksgiving Day, November 23, 1972, in the name of Frank Sopko, 4860 Roosevelt Boulevard, Philadelphia, Pennsylvania. That the said Mr. Sopko used no firm name or address and used a Pennsylvania Registration Number of 689-482 on an alleged Chevrolet Coupe. A subsequent search revealed that the said registration number was issued to an international station wagon in the name of Marilyn and Marland Patillon, R.D. No. 1, Box 73, Strousberg, Pennsylvania.

7. At about the hour of 9 a.m. on the date of November 28, 1972, Corporal Charles J. Todd and Trooper Anthony S. Caldonetti observed a black vinyl top over brown Buick bearing Pennsylvania Registration No. 4J1-730 parked in the same place as observed the previous day by David J. Greth in the same backed up position. A subsequent check of the said registration number revealed same to be issued to Nicholas Pratkano, 4642 Roosevelt Boulevard, Philadelphia, Pennsylvania. Cpl. Charles J. Todd and Trooper Gerald DeWalt proceeded immediately to 4642 Roosevelt Boulevard, Philadelphia, Pennsylvania and found the entire 4600 block of Roosevelt Boulevard to be occupied by Sears and Roebuck Co.

8. At about the hour of 10:30 a.m. a housemaid at the George Washington Motor Lodge made an attempt to clean Room 175. The maid knocked on the door of Room 175 and this brought a verbal response from an unknown white male. The unknown white male indicated that he did not want the room cleaned but told the maid to give him enough towels "for us." Additionally, the unknown white male subject requested that he not be disturbed this day or the following day. That at about the hour of 12:30 p.m. on the date of November 28, 1972 three white males were observed leaving the area of Room 175 walking towards the aforementioned Buick automobile bearing Pennsylvania Registration No. 4J1-730. Two of these unknown white males stood outside the Buick automobile one of them holding a car case in his right hand. This latter subject was in a stooped position at this time. Within a minute or so, these two men were joined by a third man. One of the three men was observed carrying a brown paper bag, one of these three men was observed carrying a black suitcase and a black or dark travelling case type bag. Within moments, the three men walked away from the vicinity of the aforementioned Buick. One of these men was observed running down a hill to the rear of the Motel and was identified as Cpl. Curtis Guyett, Pennsylvania State Police. All three men fled the area. The men were also standing by a dark green over light green 4-door Mercury bearing 1972 Pennsylvania temporary Registration No. 1619-508 and bearing manufacturer's serial number 3B445511441. Said temporary registration number issued to David Ertley, Inc., 310 Market Street, Kingston, Pennsylvania. A subsequent check of all George Washington Motor Lodge records for this date revealed no such registration number and/or vehicle issued to any guest.

9. At about the hour of 2:40 p.m. on the date of November 28, 1972, a white male dressed in a suit and tie entered the aforementioned Buick automobile after alighting from a green Plymouth Sedan which was parked near the rear of the George Washington Motor Lodge. This man was identified as Lt. Steven Luchansky of the Pennsylvania State Police. Lt. Luchansky entered the aforementioned Buick automobile and attempted to drive same away. Trooper Anthony Caldonetti attempted to talk to Lt. Luchansky but Lt. Luchansky completely ignored Trooper Caldonetti after saying, "what?". At this point, Sgt. Mathew A. Hunt, Pennsylvania State Police, attempted to stop Lt. Luchansky to talk with him. The automobile driven by Lt. Luchansky stalled momentarily and officer continued to talk to Lt. Luchansky while he attempted to get the automobile in a running condition. Lt. Luchansky completely ignored Sgt. Hunt. When Lt. Luchansky got the automobile in running condition, Sgt. Hunt again attempted to confer with him and Lt. Luchansky again ignored Sgt. Hunt. At this point, Sgt. Hunt advised Lt. Steven Luchansky that he was under arrest and Lt. Luchansky then attempted to assault Sgt. Hunt with the aforementioned automobile by attempting to run over Sgt. Hunt. Lt. Luchansky then sped out of the George Washington Motor Lodge through the front entrance in a completely reckless manner and turned south.

10. At about the hour of 2:55 p.m. Assistant Manager Ray Richards proceeded to Room 175 of the George Washington Motor Lodge and entered the said Room in the company of Trooper Albert Pistone and Sgt. Mathew A. Hunt of the Pennsylvania State Police. A preliminary examination of the area immediately above Room 175 revealed the three alleged phone "taps" still intact. The room was immediately secured for further identification processes.

11. At about the hour of 4:10 p.m. Security Agents Robert S. Dracup and William S. Schellenger made an examination of the area immediately above Room 175 in connection with the unlawful splicing of Bell Telephone Company property. Security Agents Dracup and Schellenger stated definitely that the Bell Telephone lines were tampered with and two foreign wire attachments were found immediately above Room 181 and one foreign wire attachment was found immediately above Room 175.

The aforesaid information revealed to Corporal Robert J. Bugio, Pennsylvania State Police, directly from Sgt. Matthew Hunt, Pennsylvania State Police.

I ask that a Search Warrant be issued to the affiant who is a proper Peace Officer, directing him to search said person or place or thing and seized said thing or things

Col. Robert J. Bugzo
Corporal Robert J. Bugzo, Affiant

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF MONTGOMERY : SS

On this 28 day of November 1972,

before me An Issuing Authority in and for the said County and Commonwealth personally appeared the Affiant above named, who being duly Sworn (Affirmed) according to law, Signed the Complaint for Search Warrant in my presence and while under Oath, gave further oral testimony and stated the facts set forth herein are true and correct to the best of his knowledge, information and belief.

Also appearing before me was _____ who, being duly Sworn (Affirmed) gave further facts relating to the probable cause above stated. I believe the affiant to be a responsible person and that there is probable cause for the issuance of process.

(Seal)

Elaine Adams
Issuing Authority

My Commission Expires:

ELAINE A. ADAMS
DISTRICT JUSTICE OF THE PEACE
MONTGOMERY COUNTY, PA
DISTRICT 30-
MY COMMISSION EXPIRES
1st MONDAY OF JANUARY 1976

SEARCH WARRANT

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF MONTGOMERY : SS

The Commonwealth of Pennsylvania, to

Cerperal Robert J. Bugjo and assistants, agents, deputies, members of the Pennsylvania State Police, acting under him or them or any of them.

GREETING:

WHEREAS, a Complaint for Search Warrant has this day been made before the undersigned, an Issuing Authority in and for the said County and Commonwealth upon oath (affirmation) of Pennsylvania State Police, that there is probable cause to believe and that he does believe that the following items: (here list property to be seized in detail) any device and/or apparatus, attachments, wiring and any other associated paraphernalia which can be used in the interception of telephone communications

For details see Attached Complaint for Search Warrant

are concealed;

On the person of: (give name, if no name, give description)

In the premises known and described as: (here describe in detail the place to be searched). area immediately above Room 175 and Room 175 of the George Washington Motor Lodge located at King of Prussia, Pennsylvania; said room identified by the number on the door and is the front part of a one and one-half story frame dwelling

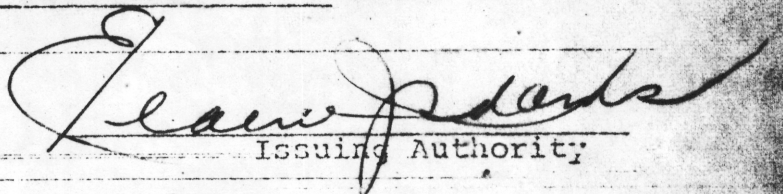
and situated at Route 202 in the Township of Upper Merion Montgomery County of King of Prussia, Pennsylvania and in the possession of and occupied by one Stanley Knotts, who said room is registered to.

AND WHEREAS, the undersigned Issuing Authority is satisfied that there exists probable cause to believe this is so;

NOW THEREFORE, these are to command you and everyone of you forthwith, by day or by night, to make diligent search (of the person named or described; of the place or thing described) above, for the property described above; and if you find the same, or any part thereof, you are then to secure the same and bring the same, and the person or persons in whose custody you find the same, before the undersigned Issuing Authority, to be examined and further dealt with according to law.

WITNESS our said District Justice of the Peace,
Montg. Co. District Court 38-1-01, who hath fixed her hand and seal this 28th day of November 19 72

(Seal)


Issuing Authority

My Commission Expires:

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ELAINE J. ADAMS
DISTRICT JUSTICE OF THE PEACE
MONTGOMERY COUNTY, PA.
DISTRICT 38-1-01
MY COMMISSION EXPIRES
1st MONDAY OF JANUARY, 1976

RETURN OF SEARCH WARRANT

28 Nov 1972

Search Warrant executed at 10:00 O'clock, P M., 28 Nov 1972

by Cpl. Robert J. Bugzo

and served upon Joseph R. Morahan, George Washington Motor Lodge, Rt 202 + 23, King of Prussia, Pa 19046 :

In pursuance of the within Warrant, I made search for the goods therein described, at the place mentioned, and found and seized the following articles,

- to-wit: (1) Blue wire - lying in rafters - By Sgt M Hunt
- (1) Red wire with plastic clip found attached to Bell Telephone wire leading to Room 208 - found by Sgt Hunt

And the articles so found; and the body of the said

I have in my charge and custody.

So answers Robert J. Bugzo on Oath.

Robert J. Bugzo Officer Cpl. Title of Officer

Pursuant to the within Warrant, I made search at O'clock, M., 197, for the goods therein described, at the place mentioned, but could not find any of them. So answers on Oath.

Officer