

MD 1057-15 Transferred ex 6239-15

CLERK OF COURTS  
MONTGOMERY COUNTY  
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2015 AUG 28 AM 10:19

**DISTRICT ATTORNEY'S APPLICATION  
FOR THE SEALING OF SEARCH WARRANT  
PURSUANT TO PENNSYLVANIA RULE OF CRIMINAL  
PROCEDURE 211**

The District Attorney of Montgomery County, Risa Vetri Ferman, by and through her Deputy District Attorney Thomas W. McGoldrick, requests that the attached search warrant be sealed for an extension of thirty (30) days under Rule 211 of the Pennsylvania Rules of Criminal Procedure and in support of this request avers:

1. I am familiar with the details involving the Thirty-Fifth Statewide Grand Jury, Notice #123, recommending criminal charges against Pennsylvania Attorney General Kathleen G. Kane to wit: Perjury 18 Pa C.S.A. 4902, False Swearing 18 Pa C.S.A. 4903, Obstructing Administration of Law or other Governmental Function, 18 Pa C.S.A. 5101, Official Oppression, 18 Pa C.S.A. 5301, Contempt of Court pursuant to 42 Pa C.S.A. 4549.
2. We are conducting an investigation after receiving an investigative referral from the Honorable William R. Carpenter, the Supervising Judge for the Thirty-Fifth Statewide Grand Jury Notice #123 on December 19, 2014. We are working in conjunction with the law enforcement officers conducting the investigation from the Montgomery County Detective Bureau.
3. The Commonwealth believes and therefore avers that good cause exists for the sealing of the Search Warrant, this Affidavit, and the Affidavit of Probable Cause, for the following reasons:
  - a. Disclosure of the contents of this Affidavit of Probable Cause would compromise an on-going investigation into the possible violation of Grand Jury secrecy and related crimes involving

Pennsylvania Attorney General Kathleen G. Kane.

- b. Disclosure of the contents of this Affidavit would reveal the particular investigative techniques being used by law enforcement at this time and compromise their effectiveness;
  - c. Disclosure of the contents of this Affidavit would also reveal the names of cooperating witnesses and agent(s) and employee(s) of the Office of Attorney General that may then be intimidated by Pennsylvania Attorney General Kathleen G. Kane or her top aides and associates.
4. For the reasons set forth in this Affidavit, and in the Affidavit of Probable Cause of Detective Paul Michael Bradbury, I hereby request this Honorable Court to authorize the requested seal of this Application, the Search Warrant and the Affidavit of Probable Cause, for an extended period not to exceed thirty (30) days, renewable for thirty (30) day increments thereafter, pursuant to Rule 211 of the Pennsylvania Rules of Criminal Procedure.

Thomas W. McGoldrick  
**Thomas W. McGoldrick**  
**Deputy District Attorney**  
**Montgomery County**