

DECLARATION OF INSPECTOR RON ROTH

I am Inspector Ron Roth of the San Francisco Police Department, and I have been conducting an investigation into the misuse of confidential government information and the invasion of privacy of over 1,000 persons. In connection with this investigation I prepared a search warrant affidavit with exhibits for five search warrants which were issued by the Hon. Lenard Louie. I believe that that affidavit is true and I have attached a copy of it with its exhibits to this affidavit and included it within Exhibit "A".

I have read an affidavit prepared by Sgt. Steve Gudeli of the San Francisco Police Department regarding this same investigation which affidavit I believe to be true and which I have attached and is included within Exhibit "A".

I personally went to Los Angeles to serve the search warrant and search the Anti-Defamation League (ADL) office in that city. The persons in charge of that office wished to cooperate with my investigation and consented to a search of that office and that search warrant was not served. All of the items removed from that location were copied and copies were left with ADL. The seized items were returned to San Francisco and index of which is attached hereto and is included within Exhibit "A".

I spoke to San Francisco Police Department Captain John Willett who told me that the persons in charge of the San Francisco ADL office at 720 Market St., SF and their attorneys wished to cooperate with our investigation and they consented to the search and the search warrant was not served.

All of the items removed from that location that belonged to the ADL were copied and copies were left with the ADL. All other items that did not belong to ADL were removed and were not copied. The seized items, an index of which is attached and included within Exhibit "A".

I have observed and examined the items seized from Roy Bullock's residence which location I have blacked out from the copies of the attached search warrants for Mr. Bullock's safety. Mr. Bullock did not consent to the search but the search warrant was served with his cooperation, according to Inspector Robert Hulsey. The seized items, an index of which is attached and included within Exhibit "A".

I have observed and examined the items seized from the residence and storage shed belonging to Thomas and Julie Gerard, the location of which I have blacked out for their safety. I was informed by Sgt. Gudeli who conducted that search that Thomas Gerard was not present at the time of the search, however, his wife was present and although she did not consent, the searches

were conducted with her cooperation. The seized items from each location, indexes of which are attached hereto and included as part of Exhibit "A".

I spoke to FBI Agent Joel Moss who told me that he interviewed Roy "Cal" Bullock on two occasions at the office of Bullock's attorney and that Moss memorialized these two conversations in FBI reports which Moss gave to me and which I have read and which I believe to be true and which I have copied and attached hereto collectively as Exhibit "R".

I also spoke to Roy "Cal" Bullock and I agreed that the statement he gave to me would not be used against him in a criminal trial. These conversations were tape-recorded and have been transcribed. I have read the transcriptions and they are accurate renditions of our conversation. I am attaching them to this affidavit collectively as Exhibit "C" because they may contain evidence which may be exculpatory or which might tend to detract from the probable cause described in this affidavit. I do not wish the court to consider these statements for purposes of probable cause.

I prepared a search warrant affidavit on 2/5/93 for the search of Thomas Gerard's bank accounts, Roy "Cal" Bullock's bank accounts and a black briefcase which was found in a locker belonging to Thomas Gerard. I have attached a copy of that affidavit to this affidavit as Exhibit "A". A copy of the search warrant return and inventory for the briefcase has been copied and is attached and is referred herein as Exhibit "D".

I was told by Agent Moss as contained in Exhibit "R" that Roy "Cal" Bullock was an employee of Anti-Defamation League but that the ADL did not pay Bullock directly. Moss told me that Bullock received his ADL salary from a lawyer named Bruce Hochman in Los Angeles. I called Los Angeles telephone information and found a listing for Bruce Hochman, an attorney at telephone no. (310) 273-1181. I spoke to a man who told me he was Mr. Hochman and that he had been receiving salary checks from the Anti-Defamation League and then depositing them to Hochman's own account and then writing his own check to Roy "Cal" Bullock to pay his ADL salary. Hochman told me that he had been doing this for approximately 25 years. Notes of my conversation with Hochman have been copied and my notes are attached to this affidavit and are referred to herein as Exhibit "C". Mr. Hochman sent to me his bank records for the past three years. I reviewed those records which consisted of cancelled checks. I determined that the statement made to Joel Moss by Roy "Cal" Bullock and the statement made by Bruce Hochman are true in that ADL paid Bullock's salary by sending a check to Hochman who in turn sent a check to Bullock.

As a result of the search warrants served on Roy Bullock's bank account at the Bank of America, I have so far received his bank records and cancelled checks for the period July 1985 through

August 1980. The Los Angeles attorney Bruce Hochman sent me cancelled checks he had written to Roy Bullock for the period January '90 through February '93. I have examined all of these cancelled checks written to Roy Bullock from Bruce Hochman. Most checks have a notation on the bottom "Research". The checks are generally written weekly and in 1985 they started out in the amount of \$250 per check. In 1990 the amount increased to \$550 per check and appears to be constant through 1993. Of the 333 checks I have examined in this time period the total amount paid to Bullock was \$169,375.00. A log of all Hochman checks examined has been made, and a copy of which is attached hereto and now referenced as Exhibit "F".

I spoke to David Gurvitz who told me that he had been an employee of the Anti-Defamation League and that he knew Roy Bullock. I tape recorded this conversation and a transcription of that interview which I believe to be accurate is attached hereto as Exhibit "G". I spoke to FBI Agent Joel Moss who told me that he had a recent interview with David Gurvitz and that he memorialized that interview in an official FBI report, which I have read and which I believe to be true, a copy of which is attached hereto as Exhibit "H".

I spoke to Tim Carroll who told me that he was a San Diego County Sheriff's Detective and that he knew Tom Gerard and Roy Bullock. I tape-recorded our interview, an accurate transcript of which is attached hereto and is included in Exhibit "A".

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DATA BASES

I have examined the data bases extracted from the 12-10-92 confiscated computers from the residence of Roy Bullock and the residence of Tom Gerard. In the "Paradox" computer program, Bullock had a data base named "PDX ROY/DR". This data base was divided into four categories named: "ARAB" "PINKO" "RIGHT" "SKINS". Gerard's computer also had this "PDX ROY/DB" data base. Gerard's was divided into five categories: "ARAB" "PINKO" "RIGHT" "SKINS" and "A.N.C.". A.N.C. stands for African National Congress. This is believed due to interviews made as well as data analysis.

Within the "PDX ROY/DR" database in Bullock's computer there were 9,876 files located. The majority of these files are individual people referenced along with their address, sometimes a physical description and a comments field. The comments field often contained group affiliation or a list of meetings attended by the subject. There were also fields in each record that called for a driver's license number and another field for their vehicle license plate number. In Bullock's data base, we located references to 1,394 driver's license numbers and license plates.

Gerard's data base seems to contain many of the same files as Bullock's data base, with the exception of several later entries. Due to the exact names of both files: "PDX ROY/DR", and the fact that many files are identical in nature, and there are numerous misspellings that are identical to both, including the word "liscense" in a field of its own on every file of both data bases, it is believed that at one time Bullock gave Gerard a copy of his data base. At that time it is believed that both subjects (Gerard and Bullock) added onto them separately.

An analysis of Gerard's data based "PDX ROY/DB" found that he had 7011 files. These were constructed similar to Bullock's. We located 824 references to driver's licenses and license plates in Gerard's data base.

Reference were found in both computer data bases to: F.B.I., C.I.I., and local criminal history numbers.

Also located in both computers, were numerous references to hundreds of political, religious, social, ethnic, and business groups. These references were made both in the data bases and in documents retrieved. A copy of the groups listed is attached to this affidavit and now referenced as Exhibit "I".

Based on the evidence, exhibits and facts in this affidavit I believe that Roy Bullock and ADL had numerous peace officers supplying them with confidential criminal and DMV information.

TRASH

Upon examining the documents extracted from Roy Bullock's computer, which was seized on 12-10-92, I read two documents titled: "CHRISTIC" and "CHRIST 2". Both documents refer to the Christic Institute in San Francisco. Among other items mentioned in these documents, which are dated May 1988 and Jan. 10, 1990, respectively, are the names and phone numbers of many employees including the home phone numbers of the heads of the Marin and San Jose offices. Also mentioned are telephone messages to staff members, (including names and phone numbers of callers) office correspondence listing the names and return addresses of the senders and dates of letters, and inter-office notes. These reports also make mention of the fact that The Christic Institute maintains bank accounts with Wells Fargo and with Fureka Federal Savings. The report "CHRIST 2" goes so far as to itemize 5 checks written, including the payees, the dates, and amounts. It also includes the balance of the checking account.

I was able to examine and read another set of documents retrieved from Bullock's seized computer. They were titled "P...." and "H....2" through "H....6", for a total of six documents.

These documents pertain to a right winged individual that has been associated with the White Aryan Resistance, W.A.R. Some of the documents refer to notes and letters read (possibly from the trash) that refer to this subject and his family. The documents refer to this subject's daughters and lists their ages as 10, 12, and 13 years old as well as their names. Notes that these girls wrote to each other are quoted in these documents. It should be noted that these children are described as having right-winged leanings as they refer to skinheads and swastikas in their quoted writings.

BANK RECORDS

I have examined bank records from Tom Gerard's account at the San Francisco Police Credit Union. These records were given to me as the result of a search warrant served at that location on 02/08/93. The records examined were for the period between 1985 and December of 1992. A closer analysis revealed that between November 26, 1990 and June 8, 1992 Tom Gerard made over \$10,500 in cash deposits. Upon examination of the deposit slips in these transactions, I have found that approximately 76% of this amount was deposited in denominations of \$50's and \$100's.

This time frame, and the amount of cash, and it's denominations will tend to corroborate statements made by Bullock to the F.B.I. with respect to the money Bullock and Gerard allegedly received from representatives of the South African government. Bullock told Agent Moss that the amount of approximately \$16,000 was split between he and Gerard over approximately 4 years.

I have also examined partial bank records from Roy Bullock's account at the Band of America. These partial records, from 1985 - 1988, were given to me as the result of a search warrant served at the Castro St. branch on 02/08/93. The records examined by me showed that in this time frame Bullock had cashed \$12,808 in money orders and cashier's checks. 12 of these money orders were American Express money orders totalling over \$8626. Five of these American Express money orders were for \$1000 each. Bullock has made statements to me that personnel in the San Francisco A.D.L. office pay him money orders for him to cash and pay his informants and for his expenses in his field investigating.

OPERATION FVFSDROP

I have reviewed documents and data retrieved from the computer seized from the 12-10-92 search of Roy Bullock's residence. Among those retrieved documents I read one titled "SCUMBAG DOX". This document refers to an informant of the ATF (Alcohol Tobacco and Firearms). The document describes how this informant was in fact a highly placed member of the group White Arvan Resistance (W.A.R.). It also says that this informant wrote and recorded the racist "hot-line" hate messages for the W.A.R. group. I have interviewed on the telephone a man claiming to be a self proclaimed White Supremist, Tom Metzger. Metzger told me that he is associated with the W.A.R. group and has been connected with some of the W.A.R. "hot-lines" in operation throughout the state.

The "SCUMBAG DOX" document further states that this ATF informant had the access code for the W.A.R. "hot-line", which allows one to hear all the recorded messages left after the signal beep. This document was dated 12/29/90 and was signed by "Cal" indicating Roy Bullock. The document refers to the informant by name.

I also reviewed a document from the same computer, titled "FVFSDROP DOX". The document is quoted as saying: "With information supplied by an official friend, we are now able to listen to all messages left on the war hotline (541-5688). Starting on the weekend of November 3rd, I have monitored the phone number on a continual basis."

This document, "Fvesdrop DOX", is dated 11/8/90 and is signed by "Cal" (indicating Roy Bullock). With my interview of former Los Angeles A.D.L. employee David Gurvitz, I knew that when A.D.L. employee's refer to "official friend", they are referring to friends in law enforcement. This document further transcribes calls which were apparently made to the W.A.R. hotline. The calls are dated and identified with respect to the callers name and time and message.

I have examined similar documents retrieved from Bullock's computer. These documents number 15 and are titled "Fves 2" numerically through to "Fves 15". They are all similar in which they describe messages left on the hotline, with respect to date, time, caller info, and message. Many of the messages referenced are racist in nature and many have notations in parenthesis that note the individuals California Driver's License number, vehicle registration information, or P.O. Box information.

The last document in this series is titled "Fves 15" and is dated October, 1991.

I have reviewed material and documents seized at a 12-10-92 consent search of the S.F. A.D.L. office. I am aware that among items seized by Insp. Dennis Maffei was a manila folder file titled "OPERATION EVFSDROP". I reviewed this file and found it to contain four reports, 3 were on pink paper and one on white paper. Three of these are the same as those found in Bullock's computer, which are labeled in Bullock's data base "EVFS 4, EVFS 5, EVFS 7". All are headed on top by "Subject: War Voicemail Messages" and all are dated in the April - May 1991 time-range. The fourth document found in the S.F. - A.D.L. folder file labeled "OPERATION EVFSDROP" is dated May 21-22, 1991 and could not be located in the Bullock computer. This document is similar to the rest and stapled to it is an A.D.L. piece of notepaper imprinted with the A.D.L. logo and the words: "From the desk of Richard S. Hirschhaut". The following names are typed on the notepaper: "Irwin Suall" "Alan Schwartz" "Mort Kass" "Betsy Rosenthal" and the words "For Your Information" are typed below.

I recognize all of those names to be former or present A.D.L. employees in different A.D.L. offices across the country. I have knowledge that there are approximately 35 A.D.L. offices in the country and the S.F. office is known as the Central Pacific Regional Office.

After reviewing the documents seized from the San Francisco and Los Angeles A.D.L. I know that it is common for A.D.L. reports to be routed to different A.D.L. offices across the country.

It should be noted that in my interview with Bullock, he told me that he left copies of all "EVFSDROP" related documents on S.F. A.D.L. Executive Director Rich Hirschhaut's desk. On several occasions, Bullock told me, he personally discussed "Operation Evesdrop" with Hirschhaut and handed him the reports.

On April 5th 1993 I received a letter from Bruce Hochman the attorney who has been passing on the A.D.L. payments to Roy Bullock. Mr. Hochman had previously told me that he would send to me a copy of the check that A.D.L. sends to Hochman for Bullock.

In the letter was enclosed a copy of an A.D.L. check, a copy of both check and letter is attached hereto and incorporated by reference as Exhibit "K". The name of bank upon which the check is drawn is the City National Bank, Wilshire La Cienega Office, 842 Wilshire Blvd., Beverly Hills, CA 90211.

David Gurvitz told me that this bank is the same bank, (but a different branch) in which that the A.D.L. has a secret fund which is an account in the name of "L. Patterson". Gurvitz has previously told me that David Lehrer, the person in charge of the

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Los Angeles A.D.L. office kept a City National Bank check book in Gurvitz' ADL office safe. The name on the checks was L. Patterson. Gurvitz told me the bank was located at Olympic and Vermont Sts., Los Angeles. I believe this bank to be at 1730 W. Olympic, Los Angeles, CA. Gurvitz told me that David Lehrer is the only one that signs these checks as "L. Patterson".

The purpose of this check book was to pay for expenses for the fact finding operations of Los Angeles A.D.L.

Pased on the facts contained in this combined affidavit and its exhibits and my experience and training I believe that the bank records from these two checking accounts would show: (1) that Roy Bullock is an employee of A.D.L. (2) who in A.D.L. supplies the funds to pay Roy Bullock (3) who receives surreptitious payments from the L. Patterson account, (4) whether there are any other hidden employees other than Roy Bullock.

David Gurvitz had told me on 3/31/93 that all salary checks came from the New York office of A.D.L. Gurvitz also told me that he knew of some other code named fact finders and field investigators like Roy "Cal" Bullock and that their names are: (1) In Chicago there is an ex-police officer named CHI-3 (2) In St. Louis there is IRONSIDES (3) In Atlanta there is an Arab speaking man named FLIPPER. Since it appears that nationwide there are additional secret code named employees of A.D.L. and since it appears that there are other California code named employees such as SCOUT, SCUMBAG and HOT SPURS, I believe that the bank records for the two described Bank accounts will tend to show that other state income tax felonies have been committed and that the evidence of such felonies will be found in the bank records and check books at the A.D.L. offices as well as the bank records that exist at the bank's offices.

Attached to this search warrant and affidavit is a list of items to be located at both ADL S.F. and L.A. offices. This list is incorporated herein and is now referenced as "ITEMS TO BE SEARCHED". Most of these items listed were also listed in the 12/10/92 search warrants of the same officers. At this time I requested permission to search for these items again due to the fact that on 12-10-92 ADL employees were apparently less than truthful with regards to the employment of Roy Bullock and other matters. In the L.A. ADL office when I requested employment information on David Gurvitz and on Roy Bullock I was told that the office had no records there.

During those consent searches we were also looking for a "Nation of Islam" report prepared by the F.P.I. We were not given that report by ADL employees. That report was later shared to us by

the attorney of Roy Pullock. During those searches we were not provided with or did we locate:

1. Employee records on
 Roy Pullock
 David Gurvitz;
2. Internal ADL memos or records showing the ADL's leadership relation to Pullock, Gurvitz, and the fact finding function;
3. ADL phone records for L.A. and S.F.;
4. Lists of "Official friends" or law enforcement contacts;
5. Information on the Arab American Anti-Discrimination Committee. Gurvitz told me that there were numerous files and references to this organization in the L.A. office. In fact David Gurvitz told me that any Arab American with anti-Israel leanings or any Arab Americans that wrote letters to the newspaper editors expressing anti-Israeli sentiment would be reflected in ADL L.A. files.

After numerous interviews and analysis of the documents seized in eight searches as well as examination of Pullock and Gerard's computer files I know that it is common for the ADL to keep and file information on groups such as the Arab American Anti-Discrimination Committee. It is believed that if located, these files will show that inquiries were made to D.M.V. vehicle registration and driver's license numbers of members listed at a ratio of approximately 10-15% of the total membership. For each D.M.V. inquiry by the ADL, through a law enforcement officer, a felony of 182 P.C., conspiracy, could be applied.

At this time I would request the authorization to search both ADL S.F. and L.A. offices for any information or document that is also present in Pullock's seized computer. This information will tend to show that Pullock is in fact a paid employee for the ADL and the majority of the information stored on his computer is there strictly for ADL purposes. It is believed that Pullock's data bases are in fact the ADL data bases. This conclusion is based on the comparison of ADL seized documents and Pullock's retrieved computer documents as well as statements of Pullock and Gurvitz.

On the basis of my investigation, which included numerous interviews, inquiries to other law enforcement agencies, service of numerous search warrants, and analysis of bank records as well as computer records, as contained in this affidavit and its

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exhibits, it is my belief that Roy Bullock has been a permanent employee of the Anti-Defamation League for over 25 years. Exhibits attached indicate that Bullock was paid each week by Beverly Hills attorney Bruck Hochman who in turn was reimbursed by the A.D.L. It is believed that Bullock had access to and a desk at the A.D.L. office in San Francisco and in fact received direction as to his assignments and duties from A.D.L.'s San Francisco Executive Director Rick Hirschhaut and from A.D.L.'s fact finding head in New York, Irwin Suall.

I have been in contact with a tax auditor for the State of California Employment Development Department (Tax Enforcement Section) Robert Smith. Smith told me that he has researched Bullock's name and Social Security number and was unable to find either, reported on any quarterly contribution returns filed by the A.D.L. for the period 1/1/87 through 12/31/92. The State of California's lists of permanent A.D.L. employees fail to mention Bullock.

A certified copy of the A.D.L.'s quarterly contributions for the dates 01/01/87 through 12/31/92 as well as copies of the State's A.D.L. employee lists have been supplied to me by Auditor Smith and I have attached a copy of it hereto and is now referenced as Exhibit "J".

If in fact Bullock is a permanent employee of the A.D.L. and the A.D.L. failed to report him as indicated above, the A.D.L. would be in violation of the felonies 2117.5 and 2118.5 of the Unemployment Insurance Code for each quarter. The time period indicated, 1/1/87 through 12/31/92, would represent 48 felonies committed by the A.D.L. in that any person who willfully fails to report, collect and pay over to the Department, State unemployment, disability insurance, and personal income taxes for each calendar quarter that wages were paid, violates these sections.

It is believed that records and evidence of Bullock's permanent employment will be located in the San Francisco and Los Angeles A.D.L. offices based on statements, cancelled checks, and other documents and records seized and analyzed.

It is Auditor Smith's and your affiant's experience that businesses and organizations keep the above described records, and/or computer equipment used to store business and employee records, on their business premises and/or in their home, including any outbuildings.

To further describe and explain the items in Exhibit "1" that are to be searched for and seized, you affiant explains:

Employment and Payroll Documents:

It is your affiant's and auditor Smith's experience that these records will identify current and former workers; and when, where and type of work performed. They will also show gross earnings; payroll withholdings, in any; and actual amounts paid workers individually and in total. Notices to workers will help show direction and control over the workers' serves.

Receipts and Disbursements Records:

It is your affiant's and auditor Smith's experience that records maintained by businesses are sometimes incomplete. Bank records and cash transactions records provide a more complete account of payments to workers, vendors, and creditors, as well as payments from customers. These records will also identify the responsible party(s), and availability of funds and when they were available.

Accounting, Financial, Asset and Liability Records:

These records are relevant for an investigation of the suspected offenses as they provide information regarding ownership and control of the monies, assets, and liabilities involved in operating a business, as well as any information regarding questionable manipulation of business transactions and reports in the furtherance of the suspected offenses.

Customer Documents:

These records are relevant for an investigation of this type as they help identify customers and sources of revenue. This can be used to identify workers, as well as determine the availability of funds coming into the business.

Material and Equipment Purchase and Rental Records:

These records are important in identifying workers, determining how and when suppliers, vendors and creditors are paid, verification of ownership and control of the suspect's business, and verification that transactions are bona fide expenses, void of any payroll offsetting.

Insurance Documents:

It is auditor Smith's and your affiants experience that insurance applications policies, claims, invoices, premiums, and questionnaires help identify the principals and responsible parties of the business, identify workers, and show ability to pay.

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Computer Equipment and Devices:

It is auditor Smith's and your affiant's experience that businesses commonly use electronic data storage equipment and devices to store, summarize and manipulate and various types of business records described above.

It has been the experience of Auditor Smith and the affiant that business concerns, such as the A.D.L. maintain their personnel records, payroll records, and complete business records, including electronic data storage equipment and devices, on the premises of their business.

It is possible to ascertain the true work dates, hours worked, and wages earned by and paid to all employees of the A.D.L. by seizing and analyzing their complete business records.

On the basis of the foregoing, the affiant believes that evidence of violations of the previously described sections of the CUIA, Insurance Code and the Penal Code exists on the A.D.L.'s business addresses of 720 Market St., San Francisco, County of San Francisco and 10495 Santa Monica Blvd., Los Angeles, County of Los Angeles.

It is still believed that the crimes articulated in the 12/10/92 affidavit and search warrants regarding this investigation were committed by the subject already articulated. It is believed that if located, the financial records sought in this search warrant will in fact tend to show the financial relationships of the principals involved and will show who is directing these crimes and to what extent the principals are involved.

On the basis of this information, the affiant believes probable cause exists for the issuance of a search warrant as set forth in Penal Code Section 1524. Your affiant further believes that the foregoing described property, which comes within the provisions of the California Penal Code, Section 1524(a) Subdivision 4, is located at said business, the A.D.L.

In the exhibits corresponding to this affidavit I have blacked out the following due to the nature of this investigation with respect to the safety and well being of citizen's which would possibly be endangered if their names and or addresses were revealed:

*Address references to Roy Bullock

*Address references to Tom Gerard

*Name and address references to police informants

*Name and address references of any other persons deemed to be in danger should this information be divulged.

*Confidential information received from the California Department of Motor Vehicles and/or the California Department of Justice.

In addition to above I have omitted "Exhibit R" from the 12/10/92 affidavit and search warrant. this exhibit contains law enforcement classified C.I.I. criminal information as well as D.M.V. registration and history information. This series of documents was included in the 2/5/93 affidavit and search warrants which is now referenced as Exhibit "A".

At this time the court has sealed the 12/10/92 and the 2/5/93 search warrants, affidavits, and returns. It is requested that they be unsealed to the extent that they pertain to the materials included in this search warrant and affidavit. I would further request that this court seal this original affidavit and its exhibits and instead release a redacted version of this document which is attached hereto as a redacted duplicate.

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EXHIBIT "1"

FOR ANY AND ALL OF THE FOLLOWING PROPERTY

Employment and Payroll Documents:

Employment Applications, Employment Agreements, Notices to Workers, Records of Time Worked, Payroll Checks and Journals, Payroll Computation Worksheets and Schedules, Earnings and Withholdings Records, Job Tickets, Job Logs, Job Dispatch Records, Payroll Tax Returns, and W-2 and 1099 Forms;

Receipt and Disbursements Records:

Bank Statements, Cancelled Checks and Deposit Slips, Receipts and Disbursement Journals, Petty Cash Vouchers, Records of Cash Transactions, Money Orders, Cashier's Checks and Other Types of Guaranteed Payment, Check Stubs, Check Registers, and Savings Account Documents;

Accounting, Financial, Asset, and Liability Records:

General Ledgers, Accounts Receivables, Accounts Payables, Bankruptcy Documents, Income and Expense Ledgers, Loan documents, Escrow Statements, Deeds of Trust, Grant Deeds, Rental and Lease Agreements, Balance Sheets, Income Statements, and Profit and Loss Statements; and workpapers, schedules, transcripts, and memoranda prepared by internal or external sources which may serve as a basis for inclusion in business reports;

Customer Documents:

Telephone Records, Sales Documents, Job Bids, Contracts for Services, Customer or Job Listings, Business and Job Reference Correspondence;

Material and Equipment Purchase and Rental Records:

Service and Pickup Agreements, Expense Vouchers and Receipts, and Purchase Invoices, and Delivery Receipts;

Insurance Documents:

Insurance Policies, Insurance Applications, Insurance Questionnaires, Insurance Claims, Insurance Invoices, and Insurance Correspondence.

Computer Equipment and Devices:

All electronic storage devices capable of storing electronic data regarding the above financial records including, but not limited to:

magnetic tapes, floppy disks, hard drives, and the complete hardware necessary to retrieve electronic data including, but not limited to:

C.P.U. (Central Processing Unit),
C.R.T. (Viewing Screen),
disk or tape drives, and printer

and all software necessary to retrieve electronic data including, but not limited to:

operating systems, data base, spreadsheet, work processing, and graphics programs; and all manuals for operation of the computer and software, together with all handwritten notes or printed material describing the operation of the computer and confidential password lists to enter secured files;

For the period: January 1, 1987 to the present;

For the following entities:

The Anti-Defamation League offices located at:

1. 720 Market St., San Francisco, CA
2. 10495 Santa Monica Blvd., Los Angeles, CA

EXHIBITS

1. Items to be located Los Angeles and San Francisco A.D.L.
April 1993
2. Items to be located Beverly Hills bank
April 1993
- A. Search Warrant and Affidavit by Inspector Roth
2/5/93
- B. FBI interview of Roy Bullock
- C. SFPPD interview of Roy Bullock
1/25/93 and 1/26/93
- D. Inventory from Gerard briefcase
Search Warrant 2/5/93
- E. Notes by Roth on Bruce Hochman interview
3/1/93
- F. List of Bruce Hochman checks to Roy Bullock
1985 - 1993
- G. SFPPD interview of David Gurvitz
1/28/93
- H. FBI interview of David Gurvitz
3/8/93
- I. Organizations listed in Gerard and Bullock computers
- J. A.D.L. State Tax records
- K. Bruce Hochman letter and A.D.L. check
dated 3/29/93

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EXHIBIT 1

ITEMS TO BE LOCATED LOS ANGELES AND SAN FRANCISCO A.D.L.

April 1993

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E X H I B I T

1. Any San Francisco Police Department memorandums, reports, criminal history records, intelligence reports, photos, computer print-outs.
 2. Any other federal, state, city, or county, law enforcement reports, correspondence, memos, criminal histories, photos, computer print-outs.
 3. Any printed or computer generated information making reference to any federal, state, city, or county law enforcement personal identifier criminal history numbers, or report numbers.
 4. Any reference to California Department of Motor Vehicle, or any other state department of motor vehicles, records, numbers, photos.
 5. Lists of right or left-wing groups that may have been of interest to law enforcement or names of individuals that may have been affiliated with such groups.
 6. Any writings written or composed by a law enforcement entity that tends to summarize any of the above group's ideologies, political beliefs, structure, and activities.
 7. Any safes, keys, rent receipts, safety deposit box information, documentation which may tend to show any other storage facilities.
 8. Any travel records, bank records, cancelled checks, photos, correspondence which makes reference to the 1991 A.D.L. sponsored trip to Israel, or the rental of safe deposit boxes or storage areas.
 9. Any telephone records, pager records, bank records, payroll or personnel records, cancelled checks, correspondence which tends to show a financial relationship between involved parties.
 10. Any files or records with any reference to any or all of the above.
 11. Any computers, word processors, or data oriented machine including hardware and software and accompanying mechanical devices for the operation of same, including access codes that would store or process any of the above requested information.
 12. Any computing or data processing literature, printed copy, instruction books, manuals, notes, lists, or computer programs in whole or in part, that may be needed or assist in the operation or movement of listed computer equipment.
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13. Any documents that tend to show ownership of the premises to be searched or control of the location to be searched, to include, but not limited to: utility bills, rent or mortgage receipts, leases, mail, telephone records, keys.

14. Any Federal Bureau of Investigation report or document referring the the "Nation of Islam".

And; that said property comes within the provisions of section 1524 of the California State Penal Code as noted in the attached search warrant and affidavit.

EXHIBIT "1"

FOR ANY AND ALL OF THE FOLLOWING PROPERTY

Employment and Payroll Documents:

Employment Applications, Employment Agreements, Notices to Workers, Records of Time Worked, Payroll Checks and Journals, Payroll Computation Worksheets and Schedules, Earnings and Withholdings Records, Job Tickets, Job Logs, Job Dispatch Records, Payroll Tax Returns, and W-2 and 1099 Forms;

Receipt and Disbursements Records:

Bank Statements, Cancelled Checks and Deposit Slips, Receipts and Disbursement Journals, Petty Cash Vouchers, Records of Cash Transactions, Money Orders, Cashier's Checks and Other Types of Guaranteed Payment, Check Stubs, Check Registers, and Savings Account Documents;

Accounting, Financial, Asset, and Liability Records:

General Ledgers, Accounts Receivables, Accounts Payables, Bankruptcy Documents, Income and Expense Ledgers, Loan documents, Escrow Statements, Deeds of Trust, Grant Deeds, Rental and Lease Agreements, Balance Sheets, Income Statements, and Profit and Loss Statements; and workpapers, schedules, transcripts, and memoranda prepared by internal or external sources which may serve as a basis for inclusion in business reports;

Customer Documents:

Telephone Records, Sales Documents, Job Bids, Contracts for Services, Customer or Job Listings, Business and Job Reference Correspondence;

Material and Equipment Purchase and Rental Records:

Service and Pickup Agreements, Expense Vouchers and Receipts, and Purchase Invoices, and Delivery Receipts;

Insurance Documents:

Insurance Policies, Insurance Applications, Insurance Questionnaires, Insurance Claims, Insurance Invoices, and Insurance Correspondence.

Computer Equipment and Devices:

All electronic storage devices capable of storing electronic data regarding the above financial records including, but not limited to:

magnetic tapes, floppy disks, hard drives, and the complete hardware necessary to retrieve electronic data including, but not limited to:

- C.P.U. (Central Processing Unit),
- C.R.T. (Viewing Screen),
- disk or tape drives, and printer

and all software necessary to retrieve electronic data including, but no limited to:

operating systems, data base, spreadsheet, work processing, and graphics programs; and all manuals for operation of the computer and software, together with all handwritten notes or printed material describing the operation of the computer and confidential passwork lists to enter secured files;

For the period: January 1, 1987 to the present;

For the following entities:

The Anti-Defamation League offices located at:

1. 720 Market St., San Francisco, CA
2. 10495 Santa Monica Blvd., Los Angeles, CA

EXHIBIT 2

ITEMS TO BE LOCATED BEVERLY HILLS BANK

April 1993

EXHIBIT "2"

All original application records and signature cards for the accounts in the names of:

- 1. "Anti-Defamation League of B'nai B'rith"
10495 Santa Monica Blvd., L.A.
- 2. "L. Patterson"
possibly with the address 10495 Santa Monica Blvd., L.A. or an unknown P.O. Box. (This account may have been initiated at the 1730 W. Olympic, Los Angeles branch of City National Bank)

Certified copies from bank microfilm may be seized in lieu of the originals. All the original deposit slips for deposits made to the accounts listed for the period from January 1, 1987 through March 31, 1993, and if not available certified copies from microfilm. All material and / or microfilm copies (certified) of all checks cashed or other means of withdraw from accounts listed for the period January 1, 1987 through March 31, 1993. The original bank statements, or certified copies, of the accounts listed for the period January 1, 1987 through March 31, 1993.

Specifically as listed in items 1-5 following.

- 1. All original application records and signature cards for any and all accounts of Anti-Defamation League of B'nai B'rith and L.Patterson, if not available, certified copies from bank microfilm.
- 2. All original deposit slips, and any other record showing currency denomination of cash deposits, to these listed accounts for the period starting January 1, 1987 through March 31, 1993, and if not available, certified copies from bank microfilm.
- 3. All original checks cashed or drawn against the accounts listed, or other original documents used as a means to withdraw money from said accounts for the period starting January 1, 1987 through March 31, 1993, and if not available, certified copies from bank microfilm.
- 4. All original bank statements for listed accounts for the period starting January 1, 1987 through March 31, 1993, and if not available, certified copies from bank microfilm.
- 5. Records pertaining to and access to any or all safe deposit box or boxes, including the search of the contents of, in the listed names and accounts.

All original application records and signature cards, as well as records of activity for the period January 1, 1987 through March 31, 1993, pertaining to any account, not listed above, in the name of Anti-Defamation League of B'nai B'rith, whose records thereof are maintained at the City National Bank. The nature of such accounts may include, but are not limited to, checking accounts, savings accounts, safety deposit boxes and the like. Such records may include, but are not limited to, any credit or debit made to said account either in the form of a check, cash, ATM transaction, or by transfer of funds from one account to another, the denomination of any currency in cash transactions, checks written to or from said account, records regarding the purchase of travelers checks, money orders or the like and how payments for such purchases were made, and the records of safety deposit box visits and the like for the period starting January 1, 1987 through March 31, 1993. Certified copies from bank microfilm of said documents may be seized in lieu of the originals.

I further state and declare that I have disclosed and provided the Office of the District Attorney as part of this application for this search warrant and the Court reviewing this affidavit all known material facts, whether favorable or unfavorable and that said information is contained herein.

WHEREFORE, affiant prays that a search warrant issue commanding the immediate search of the persons and premises above designated for the property or things above described, and that such property be brought before a magistrate or retained as provided in Section 1536 of the California Penal Code.

(Affiant)

SUBSCRIBED AND SWORN TO
before me on this _____ day of _____, 1993

Judge of the Municipal Court
In and for the City and County of San Francisco
State of California