



Commonwealth of Pennsylvania



RECEIPT / INVENTORY OF SEIZED PROPERTY

COUNTY OF LYCOMING

Docket Number

(Issuing Authority): MD-5-2020

Police Incident Number:

BCC200221

Warrant Control

Number: BCC200221C

Date of Search:

9/24/2020

Time of Search:

1100

Inventory Page Number:

1 of 1 Pages

SA David Scicchitano

PA Office of Attorney General

595

Affiant

Agency or Address if private affiant

Badge No.

The following property was taken / seized and a copy of this Receipt / Inventory with a copy of the Search Warrant and affidavit(s) (if not sealed) was

☒ personally served on (name of person)

DR. TIM BOWERS

☐ was left at (describe the location)

[illegible]

I/we do hereby state that this inventory is to the best of my/our knowledge and belief a true and correct listing of all items seized, and that I/we sign this Receipt / Inventory subject to the penalties and provisions of Title 18 Pa.C.S. 4904(b)--Unsworn Falsification to Authorities.

Signature of person Issuing Receipt

David Scicchitano

SA

595

Freddie Hullum
Signature of Witness

FRED A. HOLLAND

Affiliation

Badge or Title

Signature of person making Search

David Scicchitano
Printed Name

SA
Affiliation

595
Badge or Title

Commonwealth of Pennsylvania

RETURN of SERVICE
AND INVENTORY

COUNTY OF LYCOMING

Docket Number

(Issuing Authority):

Police Incident

Number: BCC200221

Warrant Control

Number: BCC200221C

Date of Search:

9/24/2020

Time of Search:

1100

Property Seized as result of Search (Y/N):

Y

Date of Return:

10/8/2020

Time of Return:

1330

Officer making Return:

SA David Scicchitano

Signature of Person Seizing Property:

Other Officers Participating in Search:

*Pa.R.Crim.P. Chapter 2, Part A. SEARCH WARRANTS**Rule 202. Approval of Search Warrant Applications by Attorney for the Commonwealth – Local Option.*

- (a) The District Attorney of any county may require that search warrant applications filed in the county have the approval of an attorney for the Commonwealth prior to filing.

Rule 204. Person To Serve Warrant.

A search warrant shall be served by a law enforcement officer.

Rule 205. Contents of Search Warrant.

Each search warrant shall be signed by the issuing authority and shall:

- (1) specify the date and time of issuance;
- (2) identify specifically the property to be seized;
- (3) name or describe with particularity the person or place to be searched;
- (4) direct that the search be executed either: (a) within a specified period of time, not to exceed 2 days from the time of issuance, or; (b) when the warrant is issued for a prospective event, only after the specified event has occurred.
- (5) direct that the warrant be served in the daytime unless otherwise authorized on the warrant, PROVIDED THAT, for purposes of the Rules of Chapter 2, Part A., the term "daytime" shall be used to mean the hours of 6 a.m. to 10 p.m.;
- (6) designate by title the judicial officer to whom the warrant shall be returned;
- (7) certify that the issuing authority has found probable cause based upon the facts sworn to or affirmed before the issuing authority by written affidavit(s) attached to the warrant; and
- (8) when applicable, certify on the face of the warrant that for good cause shown the affidavit(s) is sealed pursuant to Rule 211 and state the length of time the affidavit(s) will be sealed.

Rule 206. Contents of Application for Search Warrant.

Each application for a search warrant shall be supported by written affidavit(s) signed and sworn to or affirmed before an issuing authority, which affidavit(s) shall:

- (1) state the name and department, agency, or address of the affiant;
- (2) identify specifically the items or property to be searched for and seized;
- (3) name or describe with particularity the person or place to be searched;
- (4) identify the owner, occupant, or possessor of the place to be searched;
- (5) specify or describe the crime which has been or is being committed;
- (6) set forth specifically the facts and circumstances which form the basis for the affiant's conclusion that there is probable cause to believe that the items or property identified are evidence or the fruit of a crime, or are contraband, or are or are expected to be otherwise unlawfully possessed or subject to seizure, and that these items or property are or are expected to be located on the particular person or at the particular place described;
- (7) if a "nighttime" search is requested (i.e., 10 p.m. to 6 a.m.), state additional reasonable cause for seeking permission to search in the nighttime; and
- (8) when the attorney for the Commonwealth is requesting that the affidavit(s) be sealed pursuant to Rule 211, state the facts and circumstances which are alleged to establish good cause for the sealing of the affidavit(s).

Rule 208. Copy of Warrant; Receipt for Seized Property.

- (a) A law enforcement officer, upon taking property pursuant to a search warrant, shall leave with the person from whom or from whose premises the property was taken a copy of the warrant and affidavit(s) in support thereof, and a receipt for the property seized. A copy of the warrant and affidavit(s) must be left whether or not any property is seized.
- (b) If no one is present on the premises when the warrant is executed, the officer shall leave the documents specified in paragraph (a) at a conspicuous location in the said premises. A copy of the warrant and affidavit(s) must be left whether or not any property is seized.
- (c) Notwithstanding the requirements in paragraphs (a) and (b), the officer shall not leave a copy of an affidavit that has been sealed pursuant to Rule 211.

Rule 209. Return with Inventory.

- (a) An inventory of items seized shall be made by the law enforcement officer serving a search warrant. The inventory shall be made in the presence of the person from whose possession or premises the property was taken, when feasible, or otherwise in the presence of at least one witness. The officer shall sign a statement on the inventory that it is a true and correct listing of all items seized, and that the signer is subject to the penalties and provisions of 18 Pa.C.S. Section 4904(b) - Unsworn Falsification to Authorities. The inventory shall be returned to and filed with the issuing authority.
- (b) The judicial officer to whom the return was made shall upon request cause a copy of the inventory to be delivered to the applicant for the warrant and to the person from whom, or from whose premises, the property was taken.
- (c) When the search warrant affidavit(s) is sealed pursuant to Rule 211, the return shall be made to the justice or judge who issued the warrant.

THE LAW ENFORCEMENT OFFICER SHALL MAKE ALL RETURNS TO THE ISSUING AUTHORITY DESIGNATED ON THE SEARCH WARRANT.

Commonwealth of Pennsylvania

APPLICATION FOR
SEARCH WARRANT
AND AUTHORIZATION

COUNTY OF LYCOMING

Docket Number

(Issuing Authority):

MD-5-2020

Police Incident

Number: BCC200221

Warrant Control

Number: BCC200221C

SA David Scicchitano

PA Office of Attorney General

(814)863-6580

9/24/2020

AFFIANT NAME

AGENCY

PHONE NUMBER

DATE OF APPLICATION

IDENTIFY ITEMS TO BE SEARCHED FOR AND SEIZED (Be as specific as possible):

All records and files pertaining to the investigation by the Williamsport Area High School and the Williamsport Area School District of the Williamsport Area High School Baseball Team and their Myrtle Beach, SC trip, starting from 3/23/2018 until 9/24/2020; specifically, a search for all written reports, notes, emails, memos, interviews (both audio and video), written statements, letters, audio and video evidence, all text messages, all written messages, all social media posts, and all other documentation from this investigation. A cellular phone/handset belonging to the Williamsport Area School (continued)

SPECIFIC DESCRIPTION OF PREMISES AND/OR PERSON TO BE SEARCHED (Street and No., Apt. No., Vehicle, Safe Deposit Box, etc.):

Williamsport Area School District
2780 West Fourth Street
Williamsport, PA 17701
(570)327-5500

NAME OF OWNER, OCCUPANT OR POSSESSOR OF SAID PREMISES TO BE SEARCHED (If proper name is unknown, give alias and/or description):

Williamsport Area School District

VIOLATION OF (Describe conduct or specify statute):

Title 18, Section 5101: Obstructing Administration of Law or Other Governmental
Function; (Continued)

DATE(S) OF VIOLATION:

3/23/2018-9/24/2020

☒ **Warrant Application Approved by District Attorney – DA File No. by Daniel J. Dye, ACDAG 9/17/2020**

(If DA approval required per Pa.R.Crim.P. 202(A) with assigned File No. per Pa.R.Crim.P. 507)

☐ **Additional Pages Attached (Other than Affidavit of Probable Cause)**

☐ **Probable Cause Affidavit(s) MUST be attached (unless sealed below) Total number of pages: _____**

TOTAL NUMBER OF PAGES IS SUM OF ALL APPLICATION, PROBABLE CAUSE AND CONTINUATION PAGES EVEN IF ANY OF THE PAGES ARE SEALED

The below named Affiant, being duly sworn (or affirmed) before the Issuing Authority according to law, deposes and says that there is probable cause to believe that certain property is evidence of or the fruit of a crime or is contraband or is unlawfully possessed or is otherwise subject to seizure, and is located at the particular premises or in the possession of the particular person as described above. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents

[Signature]
Signature of Affiant

PA Office of Attorney General

Agency or Address if private Affiant

595

Badge Number

Sworn to and subscribed before me this 24th day of September, 2020. Mag. Dist. No. 29

[Signature] 48 West Third St, Williamsport, PA 17701 (SEAL)

Signature of Issuing Authority

Office Address

SEARCH WARRANT
TO LAW ENFORCEMENT
OFFICER:

WHEREAS, facts have been sworn to or affirmed before me by written affidavit(s) attached hereto from which I have found probable cause, I do authorize you to search the premises or person described, and to seize, secure, inventory and return according to the Pennsylvania Rules of Criminal Procedure.

☒ This Warrant shall be served as soon as practicable and shall be served only between the hours of 6AM to 10PM but in no event later than:*

☐ This Warrant shall be served as soon as practicable and may be served any time during the day or night but in no event later than: **

10:00 M, o'clock 26 September, 2020

☐ This Warrant shall be returned to judicial officer _____

* The issuing authority should specify a date not later than two (2) days after issuance. Pa.R.Crim.P. 205(4).

** If the issuing authority finds reasonable cause for issuing a nighttime warrant on the basis of additional reasonable cause set forth in the accompanying affidavit(s) and wishes to issue a nighttime warrant, then this block shall be checked. Pa.R.Crim.P. 206(7).

Issued under my hand this 24th day of September, 2020 at 10:00 A M, o'clock.

[Signature]
Signature of Issuing Authority

Mag. Dist. or Judicial Dist. No.

Date Commission Expires:

Title of Issuing Authority: ☐ Magisterial District Judge ☒ Common Pleas Judge ☐ _____

☒ For good cause stated in the affidavit(s) the Search Warrant Affidavit(s) are sealed for 60 days by my certification and signature

[Signature]
Signature of Issuing Authority

(Judge of the Court of Common Pleas or Appellate Court Justice or Judge).

9/24/20 (Date) (SEAL)



COUNTY OF LYCOMING

Docket Number
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Number: BCC200221C**Continuation of:**

☒ Items to be searched and seized _____ Description of premises/person(s) to be searched _____ Owner/ Occupant ☒ Violations

Items to be searched and seized (continued):

District and assigned to Principal Brandon Pardoe. A forensic analysis of this cellular phone/handset to forensically examine all content on the device and any internal or expanded memory associated with said device; to include a search for all communications in regards to the Williamsport High School Baseball Team and their Myrtle Beach trip, starting from 3/23/2018 until 9/24/2020; specifically, all communications with all employees of the Williamsport School District, Lycoming County Detective William Weber, George Lepley or anyone affiliated with George Lepley, and anyone else in regards to the investigation of the Baseball Team and the above mentioned Myrtle Beach trip. These communications shall include all memory/data storage in regard to text messaging, SMS, MMS, emails, phone call logs, voice mails, photos, and videos, and the cloud storage application. The search is to be conducted for evidence, direct and corroborative, of the criminal offense identified in the affidavit of probable cause to this warrant application, incorporated herein by reference in its entirety.

Violations (Continued):

Title 18, Section 6212(d): Sexual Abuse of Children.

Commonwealth of Pennsylvania**AFFIDAVIT OF
PROBABLE CAUSE****COUNTY OF LYCOMING**Docket Number
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BCC200221

Warrant Control
Number:

BCC200221C

PROBABLE CAUSE BELIEF IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

David Scicchitano, hereafter referred to as your Affiant, is a Special Agent with the Pennsylvania Office of Attorney General. The affiant was hired in July of 2019, and is currently assigned to the Bureau of Criminal Investigation. Prior to this, the affiant attended The Pennsylvania State University and graduated in 1987 with a Bachelors of Science degree in Administration of Justice. From 1987 through 1994, the affiant served as a Police Officer with the Penn State University Police. From 1994 through 2019, the affiant served as a Police Officer then Detective with the State College Borough Police. The affiant has over 32 years of experience in conducting criminal investigations. The affiant has training in the following: DUI, both practitioner and instructor; ARIDE; homicide investigation; internet and cell phone investigation; search and seizure; and accident reconstruction, among other training. The affiant served as the juvenile Detective and as a general investigation Detective while with the State College Police. The affiant is currently serving as a criminal investigator with the PA Office of Attorney General. The affiant has experience in criminal investigations involving the following: death investigations; DUI; assaults; drug offenses; thefts; burglaries; fraud; a fraternity hazing death; and homicide by vehicle, among other cases.

A referral was made by the Lycoming County District Attorney, Ryan Gardner, to the Office of Attorney General on 5/8/2020. On 5/27/2020, the affiant was assigned to this case. On 6/1/2020, the affiant obtained copies of the files for this case from the Lycoming County District Attorney's Office. The affiant also received a copy of the video of the incident. The affiant reviewed this and learned the following.

Between 3/23/2018 and 3/30/2018, the Williamsport Area High School Baseball Team attended a tournament in Myrtle Beach, South Carolina. At some point during that week, a video was shot from inside one of the hotel rooms for the players. The affiant watched this video and observed that the juvenile male victim #1 was asleep on a couch when the juvenile

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PROBABLE CAUSE****COUNTY OF LYCOMING**Docket Number
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PROBABLE CAUSE BELIEF IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

male suspect #1, a teammate, appeared to have put his penis in the face of the sleeping victim.

On 5/18/2018, a Lycoming County Children and Youth Services employee, Corey Burkholder, saw this video. He reported this to Matt Wood of CYS. Both Burkholder and Wood are mandated reporters. Wood did a Child Line report, and he notified William Weber, then Chief County Detective for Lycoming County who worked out of the Lycoming County District Attorney's Office. Weber notified the high school Principal, Brandon Pardoe. Burkholder provided the video to CYS; this video was in the file at the DA's Office.

Also observed in the DA's file were notes. These notes were dated 5/30/18. These notes were about a meeting with the juvenile male victim #1 and his mother. These notes also indicated that this victim was shown the video, and it was written: "(juvenile male suspect #1) admitted he did it".

The next thing in this DA's file chronologically was a supplement report from the above CYS office dated 7/18/18. Jeanne Reeder alleged that she heard allegations about team members; specifically, she heard of juvenile male suspect(s) inserting fingers or trying to insert a TV remote into juvenile male victims' rectums.

The affiant next observed in chronological order in this DA's file a copy of a news article written by Todd Bartley of Fox Sports Williamsport titled, "Millionaire Baseball Mayhem in Myrtle Beach." This was dated 8/24/18, and it appeared to aim towards exposing this incident. The next item found in this file was dated 8/27/18. It was an anonymous letter to the District attorney expressing outrage over what was reported to have happened on this trip. Also, in this file next was a phone message on 9/4/18 for Weber to call a woman. Part of the message read: "Kids were asked and instructed in Myrtle Beach to delete any videos they may have taken."

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PROBABLE CAUSE BELIEF IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

The next document in the DA's file was a printed out email dated 9/28/18. It was from Detective Tiffany Whitmire of the Myrtle Beach Police to William Weber. She asked Weber to contact her concerning an investigation he assisted with about an assault in Myrtle Beach involving the Williamsport High School baseball team. She wrote: "We need the information reference this investigation." She asked for reports, interviews, data, etc.

On 10/3/18, biographical checks on students from this high school were printed out and were present in this file. These checks were of the juvenile male victim #1; the juvenile suspect #1; and the juvenile male who shot the video.

The next thing in this file was a Lycoming County District Attorney's Office report completed and filed by Weber on 10/8/18. Weber documented on this date that he received the initial complaint from CYS in mid May of 2018. He referred to the complaint as a "youth had 'tea bagged' another youth." He also wrote: "I told C & Y that I would look into the matter due to my familiarity of WAHS and the baseball program since my son played and I attended the tournament for 3 years." He wrote that he contacted the principal, Brandon Pardoe, and advised him of the complaint. He wrote: "I told Mr. Pardoe that I had no jurisdiction about what happened in Myrtle Beach, but would assist and make referrals if need be. I also told him I was aware of the trip and what usually goes on during the annual trip." Weber also documented in his report the meeting with the juvenile male victim #1 and his mother on 5/30/18. Weber wrote that this victim didn't feel that the video was shared much, that nobody said anything to him in school and he did not feel that the video was passed around. Weber wrote: "...there was no referral to be made." Weber ended his report with: "Clearly this was a hazing/bullying issue that the school properly handled. This report was written based on my limited note taking and my memory from May 2018. I did not prepare a report at the time."

So far, at this point in the timeline based on what was in Weber's file, he did no reports on his investigation with the Williamsport High School baseball team. He maintained a file, but he

A handwritten signature, possibly "WJ", in dark ink.

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PROBABLE CAUSE BELIEF IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

never notified the Myrtle Beach Police Department, which was the law enforcement entity with jurisdiction in this matter. Instead of notifying the MBPD in May of 2018, the MBPD had to contact Weber on 9/28/2018. When they did, Weber completed his first report. In this report, Weber did not document the sodomy allegations involving juvenile victim(s) that were received by the Lycoming County CYs, and which Weber had a copy of the CYs supplemental report. Weber wrote a letter to Detective Porter on 10/10/18. He wrote about Reeder's allegations, and then wrote: "I checked with the school district and from their investigation, what she reported never occurred from their interviews."

The affiant reviewed the police reports from the Myrtle Beach Police Department concerning this investigation. The affiant confirmed that the MBPD first was notified about the aforementioned allegations on 9/28/2018 from reporter Todd Bartley seeking a comment. The MBPD was never notified by Weber or Pardoe.

The affiant also observed the following in the Lycoming County District Attorney file. The affiant saw a copy of notes with no date on it. The notes read in part: "School district was aware in Myrtle Beach...Brandon told kids to get rid of images...(juvenile male suspect #2's name)-nephew...(juvenile male victim #2's name) had penis across face suck it up parents said...(juvenile male victim #3's name)-penetrated by (juvenile male suspect #1's name)...(juvenile male suspect #2's name) holding him down...Coach Miller aware of it....(juvenile male videographer's name) was videotaping-(juvenile male suspect #1) was ringleader."

Also, while reviewing the MBPD file, the affiant observed the following. MBPD Detective Porter wrote the following occurred on 9/28/2018 when he spoke with Lycoming County Assistant District Attorney Jeff Yates:

"Mr. Yates informed me that he knows the Chief County Detective William Weber and spoke to him after reading the article. According to Mr. Yates, Detective Weber

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PROBABLE CAUSE BELIEF IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

also had no knowledge of these allegations. As of this time there is no known victim to speak to."

On 6/23/2020, the affiant called and spoke with Jeff Yates. He confirmed that he was an assistant District Attorney in the Lycoming County Office in 2018. He also said he was in charge of juvenile cases. The affiant explained to him this investigation. The affiant told him what Detective Porter of the Myrtle Beach Police Department documented in his report in regards to Yates saying that he spoke to Weber after the Bartley news article was first published. The affiant told Yates that Porter documented that he said that Weber had no knowledge of the allegations in the article. The affiant asked Yates if this was accurate, and Yates responded: "Yes." Yates said that the news article came out and he spoke to Weber, asking Weber: "Are you hearing anything?" According to Yates, Weber responded: "No." Yates also said Detective Porter called after that. It should be noted that Todd Bartley's first news article on this case came out on 8/24/2018. Detective Porter spoke to Yates on 9/28/2018. Weber was notified by CYS of the Child Line on 5/18/2018, and Weber started an investigation after this, along with Brandon Pardoe, the high school principal.

On 6/24/2020, the affiant interviewed the juvenile male victim #1 and his mother. He confirmed what was on the video and what happened to him. He also said that the juvenile male suspect #1 sat on his head as well. This victim was angry about what happened to him; he did not consent to it at all and he did not think it was funny. This victim indicated that he was called derogatory names when he was at school the following week by people who had seen the video of what had happened to him. This contradicted what Weber wrote in his "report" on 10/8/2018.

The affiant next addressed the meeting this victim had with the school officials during the last week of May 2018. His mother was present for this meeting, as were Pardoe and Weber. The victim told them what happened and who was involved. The victim gave them names, what happened to him, and they took notes. According to the victim's mother: "They promised me they would get back to me...they promised they

A handwritten signature in black ink, appearing to be "ODF".

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would question people involved and they would get back to me." As of today, none of them has ever contacted the victim's mother. The affiant asked the victim if, at any point, did he tell the school officials above, including Weber, that what happened to him in Myrtle Beach was a prank and he was fine with it. The victim said, "No." The victim's mother said: "No, not at all." The victim's mother's calls were never returned.

On 7/1/2020, the affiant interviewed the juvenile male videographer. He confirmed that he videotaped what happened to the juvenile male victim #1 on the video. This juvenile male also said that, about a week or two before school had ended for that year, he got called to the office. He said he was taken to a room in which Mr. Pardoe and maybe others were. This juvenile male was asked about the trip, and he told them what happened. When asked how this meeting ended, this juvenile male said he was told he was suspended from the team for two games. Pardoe also indicated to the juvenile male videographer that they had to show they dealt with a consequence. He said the juvenile male suspect #1 was suspended for two games as well.

The juvenile male videographer's mother said that Pardoe came to her house. He told her: "Please don't ever talk about what happened..I have this under control..." When the affiant asked her if Pardoe said anything about law enforcement or police being involved, she said he said: "It's not gonna go anywhere, so not to worry about anything..you have nothing to worry about...I'm just was here to apologize for not having him play the two games." The affiant asked if Pardoe ever told the juvenile male videographer that the Myrtle Beach Police were going to be notified. This juvenile said: "No." His mother said Pardoe said: "...not to worry about anything...nobody's getting involved...don't worry about it...I have this under control." This juvenile male also said that Weber never interviewed him.

On 8/11/2020, Todd Bartley voluntarily turned over copies of documents he obtained from the Williamsport Area School District through a Right to Know request. The affiant reviewed them. On 5/30/2018, at 0900 hours, there was an email meeting reminder. The subject was: "(Redacted) Mother and Agent Weber Meeting. Location:

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"Brandon's Office". Organizer: "Brandon Pardoe". Also written was: "I scheduled with Will Weber for this day. Please plan to attend. Thanks, BP". On 5/30/2018, at 1404 hours, there was an email sent from Rachel Joy (Paralegal for Attorney George Lepley) to Pardoe. The affiant learned that Pardoe contacted Lepley about setting up a meeting. Lepley wanted to be present. The meeting date was suggested to be on 5/31/2018. On 5/30/2018, at 2022 hours, Pardoe sent an email to Timothy Bowers. It said: "Priority: high." It also said: "We started the investigation with regard to the video taken on the Myrtle Beach trip after speaking with the parent and student today...I contacted the home of (redacted) who is the student that was videotaped doing the act to the other student. I requested to meet with them with their son. They appear to be getting an attorney to meet as well." On 5/31/2018, at 0755 hours, an email was sent from Joy to Pardoe. It said: "George asked me to find out if this is related to the Myrtle Beach Trip..."

The affiant also observed a copy of a letter that was provided by the Williamsport School District. On 5/31/2018, a letter from Attorney Lepley was sent to Principal Pardoe and Athletic Director Shawn McCann. It said: "Re: Misconduct Myrtle Beach". It also said: "I have been contacted by (redacted), parents of (redacted). The rest of the large paragraph was redacted. The last paragraph read: "It is my understanding you wish to have a meeting with (redacted) and his parents. Please note I will be present at that meeting and therefore would kindly appreciate notice of same." The letter was signed by George Lepley.

On 9/3/2020, the affiant served a search warrant on the office for the Williamsport Area School District. The affiant obtained a copy of the above letter without any redactions. After reviewing this letter, the affiant learned that Attorney George Lepley acknowledged he represented the juvenile male suspect #1. Also, Attorney Lepley wrote on 5/31/2018: "A substantial number of the players engaged in the exact same conduct..." as his client. The school district knew this on 5/31/2018, and still chose not to notify the Myrtle Beach Police. Lepley described potential criminal charges, and described his client's actions as: "Inappropriate." Lepley also identified his client in the video. Lepley threatened the school

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district if his client is prosecuted: he threatened criminal prosecution of the others engaged in similar conduct as his client; and he threatened civil action with deposing "any and all witnesses". Lepley concluded: "Our ultimate goal is to make sure that one person is not singled out for conduct committed by a substantial number of the team members."

The affiant also observed that, on 6/1/2018 at 0453 hours, an email from Pardoe was sent to Bowers. It read: "Also, a meeting has been arranged with the (redacted) family for June 5, 2018 at 2PM and their attorney." The email continued: "Fred will be attending. I plan to contact family today to inform them that their son is (redacted) until the investigation is complete. I am also going to follow up with the student, (redacted) (student who took video) today and parent to inform them that he will be in the same status." The email continued: "I had a conversation with the mother of (long redaction). I know that Fred has spoken to George regarding the matter. In addition, Agent Weber contacted me yesterday to let me know that he as well has spoken to George Lepley about the incident. It is my understanding that both of these conversations went well."

The affiant is requesting a search warrant for the Williamsport Area School District Office, 2780 West Fourth Street, Williamsport, PA 17701. Specifically, the affiant is searching for: all records and files pertaining to the investigation by the Williamsport Area High School and the Williamsport Area School District of the Williamsport Area High School Baseball Team and their Myrtle Beach, SC trip, starting from 3/23/2018 until 9/24/2020; specifically, a search for all written reports, notes, emails, memos, interviews (both audio and video), written statements, letters, audio and video evidence, all text messages, all written messages, all social media posts, and all other documentation from this investigation. The affiant would also like to search for a cellular phone/handset belonging to the Williamsport Area School District and assigned to Principal Brandon Pardoe; a forensic analysis of this cellular phone/handset to forensically examine all content on the device and any internal or expanded memory associated with said device; to include a search for all communications in regards to the Williamsport High School

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BCC200221C

PROBABLE CAUSE BELIEF IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

Baseball Team and their Myrtle Beach trip, starting from 3/23/2018 until 9/24/2020; specifically, all communications with all employees of the Williamsport School District, Lycoming County Detective William Weber, George Lepley or anyone affiliated with George Lepley, and anyone else in regards to the investigation of the Baseball Team and the above mentioned Myrtle Beach trip. These communications shall include all memory/data storage in regard to text messaging, SMS, MMS, emails, phone call logs, voice mails, photos, and videos, and the cloud storage application.

The affiant has probable cause to believe that a criminal offense that was sexual in nature may have occurred in Myrtle Beach, SC involving juvenile suspects and victims. The affiant also has probable cause to believe that this incident came to the attention of the then Chief County Detective William Weber of the Lycoming County District Attorney's Office and the Principal of the Williamsport Area High School, Brandon Pardoe. The affiant is investigating the alleged conspiracy between Weber and Pardoe to violate PA Title 18, Section 5101: Obstructing Administration of Law or Other Governmental Functions. This is evident by Weber not completing any reports on the "investigation" until being requested to by the Myrtle Beach Police, and by Weber not notifying the proper law enforcement authority with jurisdiction, as well as Weber lying to an Assistant District Attorney about his knowledge of any investigation. There is also evidence that Weber had ties to the Williamsport High School baseball team. Pardoe's participation is evident by statements made by Pardoe to the juvenile male videographer's mother. There is also evidence that a relative of Pardoe's may have participated in the alleged assault. There is also evidence that Weber, Pardoe, and Attorney George Lepley, who represented the juvenile male suspect #1, communicated with each other and participated in this investigation early on. There is also evidence that Pardoe communicated with School District Superintendent, Dr. Timothy Bowers. There is also evidence that Pardoe and Weber communicated with each other. There is also evidence that the Williamsport Area High School and School District conducted an investigation into the above matter and never notified the Myrtle Beach Police, the law enforcement entity with

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Commonwealth of Pennsylvania**AFFIDAVIT OF
PROBABLE CAUSE****COUNTY OF LYCOMING**Docket Number
(issuing authority)Police Incident
Number:

BCC200221

Warrant Control
Number:

BCC200221C

PROBABLE CAUSE BELIEF IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

jurisdiction. The evidence indicates that Weber and Pardoe conducted at least one interview together and notes were taken. Weber, in his letter to Detective Porter of the Myrtle Beach Police, also indicated that the school district did interviews during their own investigation. It is also alleged in the evidence that, "Kids were instructed to delete video." The notes in the DA's file which was managed by Weber even said: "School district was aware in Myrtle Beach...Brandon told kids to get rid of images...Coach Miller aware of it..." This suggests that school district employees knew of the incident shortly after it happened in 3/2018, and they were not first notified towards the end of May 2018 by CYS via Weber. The other violation being investigated is PA Title 18, Section 6312(d): Sexual Abuse of Children. There is probable cause to believe that a video was made of one juvenile male putting his penis into the face of another juvenile male, or a simulation of same; and there is probable cause to believe that this video was shared. The affiant wishes to retrieve said video from the aforementioned School District's files, as well as any other videos which pertain to this investigation, if they were possessed by the Williamsport Area School District as part of their "investigation".

From training and experience, the affiant is aware that people communicate often through the items mentioned to be seized. The affiant has already observed evidence that there were communications about this investigation involving Weber's, Pardoe's, and Lepley's names. The affiant wishes to identify any further evidence that may be contained in the aforementioned locations.

Your affiant requests that this warrant be sealed to protect the identity of witnesses and to secure the integrity of this active investigation. Disclosure of this information at this time would jeopardize ongoing law enforcement efforts to identify and obtain evidence and/or solicit information from potential witnesses. This request for sealing has been approved by Assistant Chief Deputy Attorney General Daniel J. Dye.

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Commonwealth of Pennsylvania**AFFIDAVIT OF
PROBABLE CAUSE****COUNTY OF LYCOMING**Docket Number
(issuing authority)Police Incident
Number:

BCC200221

Warrant Control
Number:

BCC200221C

PROBABLE CAUSE BELIEF IS BASED UPON THE FOLLOWING FACTS AND CIRCUMSTANCES:

I, SA David Scicchitano, BEING DULY SWORN ACCORDING TO LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.

Handwritten signature of David Scicchitano.

9/24/2020

Affiant Signature

Date

Handwritten signature of Manning Butts.

9/24/20
(SEAL)

Issuing Authority

Date