

**TO: Clerk's Office
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**



**APPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL**

_____ Docket Number

SUBMITTED BY: Plaintiff ___ Defendant ___ DOJ ___
Name: _____
Firm Name: _____
Address: _____

Phone Number: _____
E-Mail Address: _____

INDICATE UPON THE PUBLIC DOCKET SHEET: YES ___ NO ___
If yes, state description of document to be entered on docket sheet:

MANDATORY CERTIFICATION OF SERVICE:

A.) ___ A copy of this application either has been or will be promptly served upon all parties to this action, **B.)** ___ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: _____; or **C.)** ___ This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

_____ DATE

[Signature]
SIGNATURE

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered: _____
Judge/Magistrate Judge: _____
Date Entered: _____

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,
AND MAY NOT BE UNSEALED UNLESS ORDERED BY
THE COURT.**

DATED: _____, NEW YORK

[Signature]

U.S. DISTRICT JUDGE/U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE _____
DATE

EAG/GK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

TIFFANY HARRIS,

Defendant.

AFFIDAVIT IN SUPPORT
OF AN ARREST WARRANT

(18 U.S.C. § 249)

20-10 M

----- X

EASTERN DISTRICT OF NEW YORK, SS:

Colleen Sheehan, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about December 27, 2019, within the Eastern District of New York and elsewhere, the defendant TIFFANY HARRIS did knowingly and willfully cause bodily injury to Victim #1, an individual whose identity is known to the affiant, because of the actual or perceived religion of such person.

(Title 18, United States Code, Section 249)

On or about December 27, 2019, within the Eastern District of New York and elsewhere, the defendant TIFFANY HARRIS did knowingly and willfully cause bodily injury to Victim #2, an individual whose identity is known to the affiant, because of the actual or perceived religion of such person.

(Title 18, United States Code, Section 249)

On or about December 27, 2019, within the Eastern District of New York and elsewhere, the defendant TIFFANY HARRIS did knowingly and willfully cause bodily injury to Victim #3, an individual whose identity is known to the affiant, because of the actual or perceived religion of such person.

(Title 18, United States Code, Section 249)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and am assigned to a squad that investigates criminal civil rights violations. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. On or about December 27, 2019, beginning at approximately 12:40 a.m., the defendant Tiffany Harris accosted and slapped three Orthodox Jewish women (Victims #1, #2 and #3) in Crown Heights, Brooklyn, causing physical pain to each, in three separate instances during an approximately ten-minute period of time. Two of the victims were wearing clothing that made them identifiable as Jewish. All of the victims were simply walking down the street when the defendant approached and assaulted them.

3. The first incident occurred at the southwest corner of Eastern Parkway and Kingston Avenue. At approximately 12:40 a.m., while walking in the street, the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

defendant Tiffany Harris approached Victim #1, who was alone, and slapped her face with an open hand.

4. The second incident occurred at the southwest corner of President Street and Kingston Avenue, just three blocks away. At approximately 12:45 a.m., the defendant Tiffany Harris approached Victim #2, who was walking with five other Jewish people, two of whom were visibly Orthodox, and hit her on the back of her head with an open hand, and stated, “Fuck you Jews.”

5. The third incident occurred at the southeast corner of the same intersection. At approximately 12:48 a.m., while walking in the street, the defendant Tiffany Harris approached Victim #3, who was walking with another visibly Orthodox woman, and slapped her in the face with an open hand.

6. Following a report by Victim #1, police officers with the New York City Police Department (“NYPD”) located the defendant Tiffany Harris in the vicinity of where the assaults occurred, after which Victims #1, #2 and #3 all positively identified the defendant at the scene as their assailant.

7. Later that morning, the defendant Tiffany Harris was advised of her Miranda rights, which she indicated she understood and agreed to waive. The defendant admitted the following in part and in substance.

- a. She had a confrontation with three separate Jewish women late the previous night while walking through the “Jewish neighborhood.”
- b. She recalled slapping these women and cursing at them and also saying the words “Fuck you Jews.”

The defendant Tiffany Harris explained that she believed the three women were Jewish because the neighborhood was known as a “Jewish neighborhood” and because of the manner in which the women were dressed.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued so that the defendant TIFFANY HARRIS may be dealt with according to law.

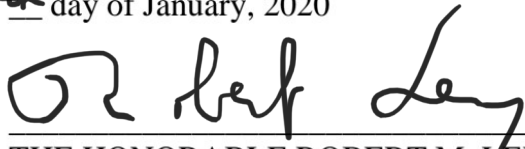
IT IS FURTHER REQUESTED that this Court file this application and the accompanying arrest warrant under seal. I believe that sealing these documents is necessary because the defendant is not aware of the investigation. Premature disclosure of the contents of this affidavit and related documents could seriously jeopardize the investigation by giving the defendant an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior.

IT IS FURTHER REQUESTED that this Court order that this application and the accompanying arrest warrant be unsealed upon the defendant's arrest.



Colleen Sheehan
Special Agent, Federal Bureau of Investigation

Sworn to before me this
5th day of January, 2020



THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

TIFFANY HARRIS

Case No. 20-10 M

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) TIFFANY HARRIS, who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

- Count 1: Knowingly and willfully causing bodily injury to one or more persons because of the actual or perceived religion of such persons, in violation of Title 18, United States Code, Section 249.
- Count 2: Knowingly and willfully causing bodily injury to one or more persons because of the actual or perceived religion of such persons, in violation of Title 18, United States Code, Section 249.
- Count 3: Knowingly and willfully causing bodily injury to one or more persons because of the actual or perceived religion of such persons, in violation of Title 18, United States Code, Section 249.

Date: 01/04/2020


Issuing officer's signature

City and state: Brooklyn, NY

THE HONORABLE ROBERT M. LEVY
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____ at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____