

## DECLARATION OF JON ADLER

I, JON ADLER, subject to penalties of perjury, hereby declare the following to be true and correct on the basis of my personal knowledge and upon information from documents I have reviewed, including those in my custody and control.

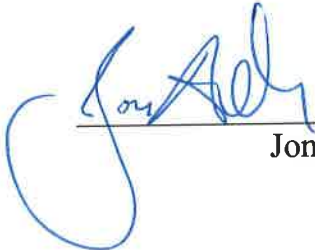
1. I am the President of the Federal Law Enforcement Officers Association (“FLEOA”) and have held this position since November 2008. I have been in law enforcement for 22 years. I am also a certified tactical instructor which includes teaching defensive tactics for close quarters situations.
2. FLEOA is the largest nonpartisan, nonprofit professional association, exclusively representing federal law enforcement officers. It represents more than 25,000 federal law enforcement officers including Federal Air Marshals (“FAMs”) FAMs are deployed by the Transportation Security Administration to “detect, deter, and defeat hostile acts targeting U.S. air carriers, airports, passengers, and crews.” <http://www.tsa.gov/about-tsa/federal-air-marshals>
3. Based on my training and experience, knives of the type and size that TSA would permit (“TSA-Approved Knives”) are weapons. They are designed to empower any individual with minimal skill to be a lethal threat. They are easy to grip and have cutting, slashing and puncturing capability.
4. I believe that a TSA-Approved Knife could cause the catastrophic failure of an aircraft. On airplanes FAMs are strapped into a narrow seat in a confined space and are vulnerable to an assault from the rear by a passenger. If armed with a knife, the passenger could potentially seize the FAM’s firearm and shoot his

way into the cockpit. The same tactical vulnerability applies for all federal law enforcement officers who fly armed regularly.

5. In addition, while pilots are usually working behind reinforced cockpit doors they leave the cockpit to use the lavatory. At that point the Flight Attendant places the beverage cart in front of the lavatory as a security measure. If one or more passengers were armed with knives and seated in the first class section of the plane, neither the cart nor a nearby Flight Attendant would deter or prevent them from mounting an effective assault on the pilot as he re-enters the cockpit.
6. Scissors on-board an aircraft pose far less of a threat than TSA-Approved Knives. From a tactical perspective, scissors require a higher skill level to use effectively as a weapon and they need to be modified to become more lethal.
7. The United States has adopted measures to protect passengers that are generally far more stringent than those endorsed by the International Civil Aviation Organization (“ICAO”). Unlike American airlines, foreign carriers are not required to have reinforced cockpit doors and in fact, do not consistently keep them closed throughout the flight. Some of these airlines do not rely on air marshals to ensure the safety of their passengers.
8. Considering that ICAO allows its member airlines to operate in such a manner, it is inappropriate for TSA to treat ICAO’s policy on knives as a justification for changing its rule on weapons.

9. I do not believe that John Pistole, the Administrator of the TSA, consulted with any government employed tactical experts other than Robert Bray, the Director of Federal Air Marshal Service, and that Director Bray opposed allowing passengers to bring knives on commercial aircraft.
10. Mr. Pistole testified that he consulted the Homeland Security Advisory Council which is comprised of state and local law enforcement groups. However, he did not seek input from its federal counterpart, the Department of Homeland Security's Federal Law Enforcement Advisory Board. This Board is comprised of all DHS federal law enforcement groups including the Federal Law Enforcement Training Center ("FLETC"). At four academies, FLETC's tactical experts train the majority of federal officers including FAMs.

I declare under penalty of perjury that the foregoing is true and correct.

  
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Jon Adler

Executed on May 1, 2013