

COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: Montgomery



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

Magisterial District Number: 38-1-06
 MDJ: Hon. Henry Schireson
 Address: 925 Montgomery Avenue
 Narbeth, PA 19072
 Telephone: (610) 949-9156
664-5262

DEFENDANT: (NAME and ADDRESS):

Ikeem	Maurice	Starks	
First Name	Middle Name	Last Name	Gen.
5126 Knox Street Philadelphia, Pa 19144			

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 4-Felony No Ext.	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> E-Misdemeanor Pending
<input type="checkbox"/> 2-Felony Ltd.	<input type="checkbox"/> 5-Felony Pend.	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> D-Misdemeanor No Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number	SID	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER		DOB 09/20/1991	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		First Name	Middle Name	Last Name	Gen.
AKA					
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown					
HAIR COLOR					
<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubrn) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk/Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde/ Strawberry)					
EYE COLOR					
<input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
Driver License	State PA	License Number 30 594 207	Expires: Suspended	WEIGHT (lbs.)	
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location	135		
FBI Number	MNU Number			Ft. HEIGHT in	
Defendant Fingerprinted	<input type="checkbox"/> YES <input type="checkbox"/> NO			6 0	
Fingerprint Classification					

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth Approved Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

Heather Castellino (Name of the attorney for the Commonwealth) Heather Castellino (Signature of the attorney for the Commonwealth) 5/25/17 (Date)

I, Justin E. Clarke / Gabriel J. Fabian (Name of the Affiant)	Badge #533 / Badge #542 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
PA Office Of Attorney General (Identify Department or Agency Represented and Political Subdivision)	PA 0222400 (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above	
<input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [413] 193 Belmont Ave 19401 and multiple other locations within Montgomery Counties. (Subdivision Code) (Place-Political Subdivision)	
in Montgomery & Philadelphia County [22 & 51] on or about 03/21/17 thru 03/24/17 (County Code)	



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: //	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: Ikeem	Middle: Maurice	Last: Starks

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input checked="" type="checkbox"/>	1	5111	A(1)	of the	18 Pa C.S.A	13	F-1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): Dealing in proceeds of unlawful activities – 13 counts

Acts of the accused associated with this Offense: Commit a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represents the proceeds of unlawful activity, the person acts with the intent to promote the carrying on of the unlawful of the unlawful activity TO WIT: Starks did drive co-defendant Smith to meet a Pennsylvania State Trooper acting in an undercover capacity and receive a Pennsylvania State Employees Visa debit card with the intention to commit fraudulent transactions. Starks then did accompany co-defendant Smith on numerous occasions to various locations to complete fraudulent gift card purchases and ATM transactions with co-defendant Smith. Starks was observed through surveillance video being present, taking part and receiving money/gift cards as the result of fraudulent gift card transactions.
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts) Carter PSECU Account 03/23/17 (5 Counts)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	2	3925	A	of the	18 Pa C.S.A	13	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): Receiving Stolen Property – 12 Counts

Acts of the accused associated with this Offense: Intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen TO WIT: Starks and Co-defendant Smith were observed on video surveillance cameras at multiple locations committing fraudulent transactions with a Pennsylvania State Employees Visa debit card and receiving US Currency or gift cards.
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts) Carter PSECU Account 03/23/17 (5 Counts)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	3	4106	A(1)(IV)	of the	18 Pa C.S.A	13	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): Access Device Fraud – 13 Counts

Acts of the accused associated with this Offense: Uses an Access Device for another reason his use of the access device is unauthorized by the issuer or the device holder TO WIT: Starks and Co-defendant Smith did use an access device (Pennsylvania State Employees Credit Union Visa debit card) for a reason (fraud) that is unauthorized by the issuer (Pennsylvania State Employees Credit Union)
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts) Carter PSECU Account 03/23/17 (5 Counts)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: //	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: Ikeem	Middle: Maurice	Last: Starks

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input checked="" type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> Lead?	4	4106	A(1)(IV)	of the	18 Pa C.S. A	4	F-3		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				

Statute Description (include the name of statute or ordinance): **Attempt - Access Device Fraud – 4 Counts**

Acts of the accused associated with this Offense: Uses an Access Device for another reason his use of the access device is unauthorized by the issuer or the device holder to wit: Starks and Co-defendant Smith did also attempt to use an access device (Pennsylvania State Employees Credit Union Visa debit card) for a reason (fraud) that is unauthorized by the issuer (Pennsylvania State Employees Credit Union) however these transactions were block by the issuer (Pennsylvania State Employees Credit Union).
Carter PSECU Account 03/23/17 (2 Counts) 03/24/17 (2 Counts)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> Lead?	5	4120	A	of the	18 PA C.S.A	13	F-3		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				

Statute Description (include the name of statute or ordinance): **Identity Theft – 13 Counts**

Acts of the accused associated with this Offense: Possess or uses, through any means, identifying information of another person without the consent of that other person to further any unlawful purpose TO WIT: Starks and Co-defendant Smith did use the identity of "Ava Carter" and "Nefeese Jackson" while completing fraudulent transactions with Pennsylvania State Employees Credit Union Visa debit cards.
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts) Carter PSECU Account 03/23/17 (5 Counts)

<input checked="" type="checkbox"/> Inchoate Offense	<input checked="" type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> Lead?	6	4120	A	of the	18 PA C.S.A	4	F-3		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				

Statute Description (include the name of statute or ordinance): **Attempt Identity Theft – 4 Counts**

Acts of the accused associated with this Offense: Possess or uses, through any means, identifying information of another person without the consent of that other person to further any unlawful purpose TO WIT Starks and Co-defendant Smith did attempt to use the identity of "Ava Carter" and "Nefeese Jackson" while completing fraudulent transactions with Pennsylvania State Employees Credit Union Visa debit cards however these transactions were blocked by the issuer (Pennsylvania State Employees Credit Union).
Carter PSECU Account 03/23/17 (2 Counts) 03/24/17 (2 Counts)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: //	OTN/LiveScan Number	Complain/Incident Number BNG000217
Defendant Name	First: Ikeem	Middle: Maurice	Last: Starks

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> 7	3922	1	of the	18 PA C.S.A	13	F-3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): Theft by Deception – 13 Counts

Acts of the accused associated with this Offense: Creates or reinforces a false impression, including false impressions as to law, value, intention or other state of mind TO WIT: Starks and Co-defendant Smith were observed on video surveillance cameras at multiple locations completing fraudulent transactions with two separate Pennsylvania State Employees Visa debit cards and receiving US Currency or gift cards as a result of fraudulent transactions.
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts) Carter PSECU Account 03/23/17 (5 Counts)

<input type="checkbox"/> Inchoate Offense	<input checked="" type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> 8	3922	1	of the	18 PA C.S.A	4	F-3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): Attempt – Theft by Deception – 4 Counts

Acts of the accused associated with this Offense: Creates or reinforces a false impression, including false impressions as to law, value, intention or other state of mind TO WIT: Starks and Co-defendant Smith were observed on video surveillance cameras attempting to commit fraudulent transactions with two Pennsylvania State Employees Credit Union Visa debit cards however these transactions were blocked by the issuer (Pennsylvania State Employees Credit Union).
Carter PSECU Account 03/23/17 (2 Counts) 03/24/17 (2 Counts)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> 9	3922	A(1)(2)(3)	of the	18 PA C.S.A	1	F-3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): Conspiracy Theft by Deception

Acts of the accused associated with this Offense: In that the Defendant on multiple occasions did conspire with another person(s) to commit a crime, to wit, Theft by Deception, in that the Defendant intentionally obtained or withheld property of another with a value exceeding \$2000 by creating or reinforcing a false impression, including false impressions as to law, value, intention or other state of mind in violation of 18 Pa. C.S. A. § 3922(a)(1)(2) and/or (3).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: I KEEM	Middle: MAURICE	Last: STARLS

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 5.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

_____ (Date)

[Handwritten Signature] 533
[Handwritten Signature] 542

 (Signature of Affiant)

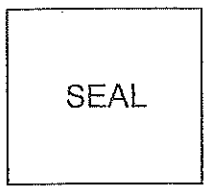
AND NOW, on this date 30 May 2017 I certify that the complaint has been properly completed and verified.
 An affidavit of probable cause must be completed before a warrant can be issued.

38-1-06

 (Magisterial District Court Number)

[Handwritten Signature]

 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name:	First: Ikeem	Middle: Maurice	Last: Starks

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Justin Clarke #533, (Affiant Clarke) is a sworn Special Agent with the Pennsylvania Office of Attorney General (PAOAG), Bureau of Criminal Investigations Organized Crime Section, located at 1000 Madison Ave, Suite 310, Norristown, Pennsylvania 19403.

Affiant Clarke has received training from the Pennsylvania State Police that includes the Class "A" certification course for Wiretapping and Electronic Surveillance conducted by the Pennsylvania State Police and Pennsylvania Office of the Attorney General in 2016. Your Affiant was certified to employ such techniques while conducting criminal investigations, maintaining "A" certification number A-5136. Since obtaining the Class "A" certification, your Affiant has participated in consensual investigations.

Your Co-Affiant, Gabriel Fabian #542, (Affiant Fabian) is a sworn Special Agent with the Pennsylvania Office of Attorney General (PAOAG), Bureau of Criminal Investigations Organized Crime Section, located at 1000 Madison Ave, Suite 310, Norristown, Pennsylvania 19403.

In February 2016, while monitoring a confidential Instagram Account regarding a separate investigation, Affiant Clarke noticed two separate Instagram users, who were using the Instagram handles "bankrollquaa" and "bankrollkiloooo," posting logos of banks and requesting other Instagram users to contact them (by "liking" photographs or private messaging through Instagram) if the other Instagram users maintained bank accounts with specific financial institutions.

After reviewing numerous photographs posted on "bankrollquaa" and "bankrollkiloooo" Instagram's page, it was believed that both live and/or frequent the North Philadelphia area. The profile picture depicted under the "bankrollquaa" Instagram account was later identified as Quadir James Burley (PA SID 41364408) (Quadir). The profile picture depicted under the "bankrollkiloooo" Instagram account was later identified as Shakour Shalik Smith (PA33919310) (Smith). Instagram users "bankrollquaa" and "bankrollkiloooo" would typically remove or delete posts, which requested other Instagram members to contact about various banking institutions, after they were posted on their respective pages for only a few hours.

On Thursday, 03/02/17, Affiant Clarke "liked" a post from "bankrollkiloooo" that requested Instagram users who maintain Pennsylvania State Employee Credit Union (PSECU) bank accounts. Through the "Instagram direct message" (Instagram DM) feature, "bankrollkiloooo" and Affiant Clarke, posing as Instagram user "avatherealone1" (a female), had an online conversation about using his PSECU bank account to make money. "Bankrollkiloooo" explained in the conversation that "avatherealone1" (Affiant Clarke) would have to provide her online banking information, debit card and PIN number to "bankrollkiloooo" and that "bankrollkiloooo" would then mobile deposit a check into the account and then strategically make ATM withdrawals and gift card purchases over two days. After the ATM withdrawals and gift card purchases were completed, "bankrollkiloooo" instructed "avatherealone1" (Affiant Clarke) to report his debit card stolen. "Bankrollkiloooo" also informed "avatherealone1" (Affiant Clarke) that once the ATM withdrawals and gift card purchases were completed; he would receive money in exchange for participation in this fraud scheme.

On Thursday, 03/09/17, Supervisory Special Agent William Ralston (SSA Ralston), Affiant's Clarke and Fabian met with PSECU Fraud Investigator Matthew Cassel (Cassel) and multiple employees from PSECU at PSECU headquarters. At this time, they discussed multiple fraud investigations that PSECU was currently investigating. At this meeting, PSECU management agreed to provide multiple PSECU fictitious bank accounts and PSECU debit cards to PAOAG investigators to assist in the investigation.

On Tuesday, 03/21/17 at approximately 1504 hours, Affiant Clarke began an Instagram DM chat with Instagram user "bankrollquaa" under the Instagram account handle "nef__215g." The following is the conversation that occurred through Instagram:

1504 **Affiant Clarke** - Was you the one to talk to if I got a bank acct nd wanna make money

1508 **"bankrollquaa"** – Yes

1513 **Affiant Clarke** – Wassup wit it? I got an acct what do I need to do.

I aint tryin to get scammed

1514 **"bankrollquaa"** – What bank you with and you won't

1516 **Affiant Clarke** –PSECU what do I need to do

1548 **"bankrollquaa"** - What's ya number

1553 **"bankrollquaa"** - ?

1605 **Affiant Clarke** – 215-613-4761

1633 **Affiant Clarke** - ?

Pennsylvania Office of Attorney General Narcotics Agent Nehemiah Haigler (NA Haigler) was assigned to act in an undercover role and pose as "Nefeese Jackson" while using the Instagram handle "nef__215g." PSECU provided a bank account and Visa debit (4305 8600 1603 0596) in the name of Nefeese Jackson.

On Tuesday, 03/21/17, at approximately 1638 hours, NA Haigler received a phone call from 267- 348-7547. NA Haigler missed the phone call and returned the phone call to 267-348-7547. During this phone call an unknown male explained his plan to defraud PSECU to NA Haigler in the following manner: NA Haigler needed to provide his online banking information, his debit card and PIN Number; the unknown male would then deposit a check into his account, and subsequently withdraw the money. The unknown male explained that NA Haigler should report his debit card stolen once all of the transactions were completed and that afterwards they would split the money that the unknown male received.

Shortly after this phone call, NA Haigler received the following text from 267-348-7547:

-lg

-lgotta do it before 6

-Bro

NA Hagler responded:

-Yo trying to hit you from another jack

On Tuesday, 03/21/17, at approximately 1653 hours, NA Haigler called 267- 348-7547 and spoke with the same unknown male as the previous phone conversation. This phone call was recorded. During this phone call, NA Haigler and the unknown male agreed to meet at the in the parking lot of the Chick-Fil-A in the Cheltenham Mall. The unknown male stated that he wanted to get all of NA Haigler's banking information when they met.

At this time, SSA Ralston, Affiant Clarke, Special Agent Joseph Chiaro (SA Chiaro), Narcotic Agents Ashley McAteer, Melissa Tamarro, and Affiant Fabian traveled to the Cheltenham Mall located at 2385 W. Cheltenham Avenue Wyncote, Pa 19095 and began conducting surveillance in the Chick-Fil-A parking lot.

On Tuesday, 03/21/17, from 1723 hours through 1905 hours, multiple text messages and phone calls were exchanged between NA Haigler and the same unknown male using the 267-348-7547 phone number.

On Tuesday, 03/21/17, at approximately 1823 hours, NA Haigler arrived at the Chick-Fil-A.

On Tuesday, 03/21/17, at approximately 1905 hours, NA Haigler called 267- 348-7547 and spoke with the unknown male. During this phone call the unknown male informed NA Haigler that he was at Chick-Fil-A. This phone call was recorded.

At this time, Affiant Clarke and Affiant Fabian observed a black Chevrolet four door sedan with tinted windows, a distinctive air freshener hanging from the rear view mirror, distinctive scuffs and scrapes on the vehicle, and bearing temporary Pennsylvania registration 2699803. (It was later determined that this vehicle was reported stolen from a location in Philadelphia on 11/04/16)

On Tuesday, 03/21/17, at approximately 1913 hours, the aforementioned Chevrolet sedan pulled near NA Haigler's vehicle. At this time, a black male who had been identified as Quadir Burley (Quadir) exited the driver's seat of the aforementioned Chevrolet sedan and began speaking with NA Haigler outside of NA Haigler's vehicle. Approximately half way through the conversation NA Haigler invited Qaudir into his vehicle. An unidentified person was observed in the front passenger seat of the aforementioned vehicle. Quadir identified the passenger as his "girl." The entire conversation between NA Haigler and Quadir was recorded. A brief summary of the conversation of the in person meeting can be summarized as follows:

Quadir outlined how a check will be deposited into NA Haigler's account. Quadir detailed how he strategically withdrawals the money out of the account on certain days because the bank's staff isn't working. After the withdrawals are completed, Quadir will meet up with NA Haigler to split the profits. Quadir instructed NA Haigler to report his debit card lost/stolen to PSECU after Quadir is done making the transactions. Near the end of this conversation NA Haigler provided Quadir the PSECU Visa debit card (4305 8600 1603 0596) in the name of Nefeese Jackson, the Pin # associated with debit card, the online banking user ID, and the online banking password. Quadir took the PSECU debit card and said, *"...I'm about to call my folks and get some paperwork now."*

The conversation ended at approximately 1920 hours.

Quadir then entered the aforementioned Chevrolet sedan and departed the vicinity of the Cheltenham Mall. Surveillance agents followed Qaudir's vehicle until he made an abrupt stop near the intersection of Broad Street and Lindley Street in Philadelphia. Surveillance was then terminated.

On Tuesday, 03/21/17, at approximately 1936 hours, Quadir's vehicle made an abrupt stop near the intersection of Broad Street and Lindley Street. At this time, Quadir called NA Haigler from phone number 267-348-7547. This phone call was recorded. During this phone call, Quadir questioned NA Haigler about the passwords needed to log onto his PSECU bank account.

On Wednesday, 03/22/17, Matthew Cassel, PSECU Fraud Investigator informed Affiant Clarke through e-mail that the PSECU card assigned to Nefeese Jackson was used at the Sunoco gas station located at 2634 N. Broad Street Philadelphia, Pa 19132 . The debit card was used for a purchase of \$1.00; however the purchase was declined due to insufficient funds. The card was then used twice at an ATM, which is located at the same address of the Sunoco for the purpose of a balance inquiry.

On Wednesday, 03/22/17 at approximately 1636 hours, a check written from Wells Fargo Bank NA, Routing No. 031000503 Account No. 044115689 to Nefeese C. Jackson in the amount of \$6,200.00 was mobile deposited into the PSECU account belonging to Nefeese Jackson. "Work" was written on the memo line. (Definition of mobile deposit - Using the camera in a phone to **deposit** a check in a bank. An application in the phone takes a picture of the front and back of the check, and both images, along with the dollar value, are transmitted to the bank.)

On Thursday, 03/23/17 at approximately 1400 hours, Affiant's Clarke & Fabian, Pennsylvania Office of Attorney General Supervisory SSA Ralston, SA Chiaro, Special Agent Kevin Schofield (SA Schofield) and Pennsylvania State Police Troopers Jovanna Brown (Tpr. Brown) Mark Salerno, Nick Scrivani, Ryan Smith, Jamie Sparenga met at the Pennsylvania State Police Belmont Barracks. At this time, Affiant Clarke and Affiant Fabian explained the investigation to everyone present.

Tpr. Brown was assigned to act in an undercover role and pose as "Ava Carter" while using the Instagram handle "avatherealone1." PSECU provided a bank account and Visa debit (4305 8600 1691 1233) in the name of Ava M Carter.

On Thursday, 03/23/17, at approximately 1518 hours, using the Instagram account handle "avatherealone1," Affiant Clarke started the following conversation with Instagram user "bankrollkilooooo":

1518 - CLARKE – Hey I got my new card. Can I get money today

1519 – "bankrollkilooooo" – What card

1520 – CLARKE - My new PSECU card

1528 – "bankrollkilooooo" –Yes

- What's your number
- (screenshot of Nefeese Jackson PSECU account)
- I just did this one yesterday

1529 – "bankrollkilooooo" - \$6200 cleared today

1530 – bankrollkilooooo - I need ya number though don't like ig talk

1532- CLARKE – I want sum

1532 – bankrollkilooooo – What's your number

-?

-And Way

- You be playing you played last time ..

1537 – CLARKE – 3024501533

- Work

- I gave u my number. This must be a scam.

1537 – bankrollkiloooo- A scam . Naw I just think you playing games

1538 – Clarke – (picture showing PSECU debit card)

1540 – bankrollkiloooo - Okay so Way I just texted you.. If we do it by 6 we can make \$6200 ..

1541 – bankrollkiloooo- Do you have online banking?

- You'll have a \$1000 today.

"bankrollkiloooo" then began communicating with Affiant Clarke/Tpr. Brown via text messaging from cell phone number 267-630-1462.

On Thursday, 03/23/17, at approximately 1550 hours, an unknown male using phone number 267-630-1462 called Tpr. Brown at telephone number 302-450-1533. The unknown person asked Tpr. Brown how long she had the bank account, if she is able to mobile deposit, and what her spending limits are. The unknown male requested Tpr. Brown's online banking user name, password, and PIN number. The unknown male identified himself as "Keife." This phone call was recorded.

On Thursday, 03/23/17, at approximately 1557 hours, the same unknown male using phone number 267-630-1462 called Tpr. Brown at telephone number 302-450-1533. During this phone call, the unknown male informed Tpr. Brown that her account is 'not enrolled.' The unknown male talked about "Ava Carter" trusting him. The unknown male instructed Tpr. Brown to logon to her PSECU through the website. This phone call was recorded.

On Thursday, 03/23/17, at approximately 1619 hours, the same unknown male using phone number 267-630-1462 called Tpr. Brown at telephone number 302-450-1533. Tpr. Brown informed the unknown person that she enrolled the account online, and the unknown male again asked for Tpr. Brown's online banking user name and password. The unknown male stated that he had already signed onto Tpr. Brown's account. The unknown male instructed Tpr. Brown to call PSECU and have the mobile deposited set up. This phone call was recorded.

Through a text message, Tpr Brown and the unknown person agreed to meet at the "Chilli's" parking lot at 175 East City Ave, Bala Cynwd, Pa 19004 at 1710 hours.

On Thursday, 03/23/17, at approximately 1730 hours, a silver Nissan Altima bearing PA registration KHJ-3613 arrived at the meet site. At this time, a B/M who was been identified as Shakour Smith (Smith) exited the aforementioned vehicle and approached and greeted Tpr. Brown. The vehicle was also occupied by two other B/M's who were later identified as Ikeem Starks (Starks) (driver) and Gregory Nathaniel Jackson (backseat passenger). Tpr Brown and Smith had a conversation that can be summarized as follows:

Smith stated that he wanted to make Tpr. Brown feel comfortable. Smith identified himself as "Kiefe." Smith stated that he wanted to answer any questions that Tpr. Brown had. Smith explained that he will mobile deposit a check into her PSECU bank account. The amount of the check would be \$6,200.00. Smith would take a picture of the front of the check and back of the check to complete the mobile deposit. Smith was not sure if the check will clear right away, but the check would definitely clear by tomorrow. Smith talked about another account with which he was currently committing the fraud. (At this time, Smith was showing screenshot photographs to Tpr. Brown of banks accounts that upon which he had already completed this fraud scheme. It is believed that the account that he referenced and showed screenshot photographs was the Nefeese Jackson PSECU account.) Smith informed Tpr. Brown that he would complete a \$300.00 ATM withdrawal and then go to Walmart and purchase (3) three \$500.00 gift cards. Smith guaranteed Tpr. Brown that if she did not get \$1,000.00 that day, she would receive \$1,000.00 by the next day. Smith informed Tpr. Brown that she can monitor the transactions on her account as Smith completed the transactions. Smith told Tpr. Brown that he would keep her posted. Smith told Tpr. Brown that they would split the money that will be obtained from this fraud scheme by stating, "...It's just me and you, I get the check made, I pay them up front". Smith instructed Tpr. Brown to call the bank and report the debit card stolen/lost after the transactions. The purpose of reporting the debit card stolen/lost would be to save Tpr. Brown from having to pay the money back. Smith stated that the bank will do a "petty investigation" and see that it's a male making the transactions and the bank won't take any further action. Smith stated, "... one thing is for sure, I have been doing this for a long time. I never had nobody go to jail...never. I work with a lot of people...I don't got no job." Tpr. Brown asked Smith if he did it one or two times. Smith responded, "Fuck one or two time, I have done it hundreds of times. I am a pro at what I do..." Smith stated that he is going to leave the meet site and go get the check. Smith told Tpr. Brown that he is from "North". Smith talked about the possibility of having Tpr. Brown recruit people to participate in this fraud in the future. Smith told Tpr. Brown that he did, "probably 15 cards with them" (PSECU). Smith stated that he goes to Police and Fire ATMs to make ATM withdrawals.

The entire in person conversation between Smith and "Carter" (Tpr. Brown) was recorded.

Near the end of this conversation Tpr. Brown provided the PSECU Visa debit card (4305 8600 1691 1233) belonging to Ava Carter to Smith.

On Thursday, 03/23/17, a check written from the Freedom Credit Union, Routing No. 236084751 Account No. 0060029733 to Ava M Carter in the amount of \$5,400.00 was mobile deposited into the PSECU account belonging to Ava Carter. "Work" was written on the memo line.

On Monday, 03/27/17, Matthew Cassel, PSECU Fraud Investigator provided Affiant Clarke with a list of fraudulent transactions that occurred on the Ava Carter PSECU debit card number 4305 8600 1691 1233.

The list of transactions are as follows:

03/23/17 19:25:33 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$280.00 – Transaction Blocked

(On Thursday, 03/23/17, at 1942 hours, Smith sent Tpr. Brown (302-450-1533) a text message from 267-630-1462 stating, "My phone on 1% trying to get it off so I need you to move fast". At this time, Smith was trying to have Tpr. Brown call PSECU and verify the purchases because the debit issued to Ava Carter was being declined.)

(A surveillance photograph was obtained from Walmart that shows Shakour Smith at the ATM inside the Walmart at the above listed time and date)

03/23/17 19:51:14 Subway Restaurant Attempted Purchase \$14.56

03/23/17 20:13:05 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$80.00

03/23/17 20:13:44 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$200.00

03/23/17 20:14:33 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$200.00 Transaction Exceeded

(For these Wal-Mart attempted/successful ATM transactions, Surveillance photographs were obtained from Walmart showing Shakour Smith inside the Wal-Mart store at the time of the successful ATM withdrawals)

03/23/17 20:20:20 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 - POS purchase \$498.00

03/23/17 20:21:12 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 - POS purchase \$498.00

03/23/17 20:22:00 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124- POS purchase \$498.00

(For these Wal-Mart POS purchases, surveillance photographs were obtained from Wal-Mart showing Ikeem Starks completing gift card purchases.)

03/24/17 00:34:09 PNC Bank ATM (inside of WaWa) 193 Belmont Avenue Bala Cynwyd, Pa 19004. ATM Withdrawal 280.00 Permanent Restriction

03/24/17 00:35:09 PNC Bank ATM (inside of WaWa) 193 Belmont Avenue Bala Cynwyd, Pa 19004. ATM Withdrawal Inquiry

(Surveillance video was obtained from inside the WaWa Store where the PNC Bank ATM is located. The video shows Shakour Smith and Ikeem Starks using two separate ATM machines at the same time. It should be noted that a PSECU debit card in the name of Nefeese Jackson was used at the same time. It appears that Starks received the \$500.00 from the PNC Bank (WaWa ATM) from the Jackson PSECU card, while Smith checked the balance on the Carter PSECU card Video surveillance shows Starks operating a silver sedan resembling the Nissan Altima that he was operating at the time of the undercover meet, Smith is a passenger in the vehicle.)

03/24/17 00:54:42 Wal-Mart Store #4687 275 N. Gulph Road King of Prussia, Pa 19406 POS Purchase \$.78 Permanent Restriction

(Surveillance photographs were obtained from Wal-mart showing Shakour Smith and Ikeem Starks standing at cash register around the time that this transactions was attempted.)

On 03/28/17, the check that was mobile deposited into Ava Carter's account was returned due PSECU unable to locate the account, thus creating a loss of approximately \$1,780.00 for PSECU.

On Thursday, 03/23/17 at approximately 0445 hours, Affiant Clarke and Affiant Fabian located the black Chevrolet sedan bearing temporary Pennsylvania registration 2699-803 in the vicinity of 1524 W. Lehigh Avenue Philadelphia, Pa 19132. At this time, Affiant Clarke and Affiant Fabian looked into the vehicle through the front windshield and observed a piece of paper that resembled an ATM receipt in the front cup holder. At this time, the car and VIN number were photographed. The VIN # was partially obscured. (2G1WG5E30D11*****)

On Friday, 03/24/17 at approximately 1333 hours, NA Haigler attempted to call Quadir (267-348-7547). At this time, Quadir answered the phone call. NA Haigler and Quadir discussed the debit card transactions and Quadir informed NA Haigler that NA Haigler would receive \$1,500.00 for participating in the fraud scheme. Quadir and NA Haigler agreed to meet early Sunday morning, 03/26/17. This phone call was recorded.

On Sunday, 03/26/17, NA Haigler attempted to call Quadir multiple times at telephone no. 267- 348-7547. After a few phone calls, it appeared that Quadir blocked NA Haigler's phone because when NA Haigler attempted to call Quadir, the phone call would go directly to voice mail; however, when Quadir's phone number was called from a different phone, it would not go straight to voicemail. Affiant Clarke also attempted to contact Quadir "bankrollquaa" through "Instagram Direct Messenger". Once Affiant Clarke contacted Quadir from the Instagram account "nef__215g", it appeared that Quadir blocked that account, as Instagram user "nef__215g" could no longer view "bankrollquaa's" Instagram page. However, any other Instagram user was still able to view "bankrollquaa's" Instagram page.

On Monday, 03/27/17, Matthew Cassel, PSECU Fraud Investigator provided Affiant Clarke with a list of fraudulent transactions that occurred on Nefeese Jackson PSECU debit card number 4305 8600 1603 0596.

The transactions are as follows:

03/21/17 19:48:29 Sunoco Store No. 0363328604 \$1.00 NSF (not sufficient funds)

(Surveillance video could not be obtained for this transaction)

03/21/17 19:49:55 2634-44 N. Broad Street -0.00 Invalid PIN Entry Balance Inquiry

03/21/17 19:20:23 2634-44 N. Broad Street - 0.000 Approved Balance Inquiry

(Surveillance video could not be obtained for these transactions)

03/23/17 12:37:58 2201 Hunting Park Avenue Philadelphia \$500.00 ATM Withdrawl

(Surveillance could not be obtained for this transaction. This transaction occurred inside the 39th Philadelphia Police District; however the camera inside the district is not currently operational.)

03/23/17 12:55:29 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 POS Purchase \$497.95

03/23/17 12:56:21 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 POS purchase \$497.95

03/23/17 12:57:25 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 POS purchase \$498.00

meet NA Haigler to receive the undercover PSECU Visa debit card. This vehicle was identified by the make, model, rims, tint, and temporary registration.

At this time, Affiant Clarke notified Police Officers Carter and Alston of the presence of the aforementioned stolen vehicle. Officers Carter and Alston initiated a traffic stop on the aforementioned vehicle near the intersection of 16th Street and Lehigh Avenue.

James Burley (James), Quadir's father was found to be operating the stolen vehicle. Will Bush (PA 25943404) was found to be in the front driver's passenger seat. James was arrested by the Philadelphia Police Department and charged with offense related to driving the stolen vehicle (1614089335). James stated that the vehicle belonged to his son, Quadir. Shortly thereafter, Quadir arrived at the location of the traffic stop and retrieved papers related to the vehicle and handed them to Officer Carter.

Your Affiants submits that the information contained herein is sufficient to provide probable cause for the issuance of an arrest warrant for Dealing in Unlawful Proceeds, Forgery, Access Device Fraud, Identity Theft, Theft by Unlawful Taking, Criminal Use of a Communication Facility & Bad Checks.

I, Justin E. Clarke / Gabriel J. Fabian, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

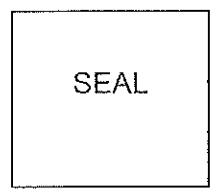
Justin E. Clarke, 533
Gabriel J. Fabian, 512

(Signature of Affiant)

Sworn to me and subscribed before me 30 day of May 2022

5-30-17 Date [Signature], Magisterial District Judge

My commission expires first Monday of January, 2022



Please provide the following information for each co-defendant.



Co-Defendant Data Sheet

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: IKEEM	Middle: MAURICE	Last: STARKS

Complaint/Incident Number BNG000217	Co-Defendant # <u>1</u>
SHAKOUR SMITH	
(Name)	
5450 WISSAHICKON AVENUE	
(Home Street Address)	
PHILADELPHIA, PA 19144	(Telephone #)
(City, State, & ZIP Code)	

Complaint/Incident Number BNG000217	Co-Defendant # <u>2</u>
QUADIR JAMES BURLEY	
(Name)	
1524 W. LEHIGH AVENUE	
(Home Street Address)	
PHILADELPHIA, PA 19132	(Telephone #)
(City, State, & ZIP Code)	

Complaint/Incident Number	Co-Defendant # _____
(Name)	
(Home Street Address)	
(City, State, & ZIP Code)	(Telephone #)

Complaint/Incident Number	Co-Defendant # _____
(Name)	
(Home Street Address)	
(City, State, & ZIP Code)	(Telephone #)

COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: Montgomery



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

Magisterial District Number: 38-1-06
 MDJ: Hon. Henry Schireson
 Address: 925 Montgomery Avenue
 Narbeth, PA 19072
 Telephone: (610) 664-5262

DEFENDANT: (NAME and ADDRESS):
Shakour **Shalik** **Smith**
First Name Middle Name Last Name Gen.
 5450 Wissahickon Avenue
 Philadelphia, Pa 19144

NCIC Extradition Code Type

- 1-Felony Full 4-Felony No Ext. B-Misdemeanor Limited E-Misdemeanor Pending
 2-Felony Ltd. 5-Felony Pend. C-Misdemeanor Surrounding States Distance: _____
 3-Felony Surrounding States A-Misdemeanor Full D-Misdemeanor No Extradition

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number	SID	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	1 / 1	7931034-6	BNG000217		
GENDER	DOB 11/23/1990	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	First Name	Middle Name	Last Name	Gen.	
AKA					
RACE	<input type="checkbox"/> White	<input type="checkbox"/> Asian	<input checked="" type="checkbox"/> Black	<input type="checkbox"/> Native American	<input type="checkbox"/> Unknown
ETHNICITY	<input type="checkbox"/> Hispanic	<input checked="" type="checkbox"/> Non-Hispanic			<input type="checkbox"/> Unknown
HAIR COLOR	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)
	<input checked="" type="checkbox"/> BLK (Black)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)
	<input type="checkbox"/> BLN (Blonde / Strawberry)				
EYE COLOR	<input type="checkbox"/> BLK (Black)	<input type="checkbox"/> BLU (Blue)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)
	<input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> XXX (Unknown)
Driver License	State PA	License Number 29 966 462	Expires: Suspended	WEIGHT (lbs.)	
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location		185	
FBI Number		MNU Number		Ft. HEIGHT /in.	
Defendant Fingerprinted	<input type="checkbox"/> YES <input type="checkbox"/> NO			5	10
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN		Year	Make	Model	Style	Color	

Office of the attorney for the Commonwealth Approved Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

Heather Castellino _____ *Heather Castellino* _____ 5/29/2017
(Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, Justin E. Clarke / Gabriel J. Fabian
(Name of the Affiant) Badge #533 / Badge #542
(PSP/MPOETC -Assigned Affiant ID Number & Badge #)

PA Office Of Attorney General
(Identify Department or Agency Represented and Political Subdivision) PA 0222400
(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [413] 193 Belmont Ave 19401 and multiple other locations within Montgomery and Philadelphia Counties.
(Subdivision Code) (Place-Political Subdivision)

in Montgomery & Philadelphia County [22 & 51] on or about 03/21/17 thru 03/24/17
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: //	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: Shakour	Middle: Shalik	Last: Smith

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input checked="" type="checkbox"/>	1	5111	A(1)	of the	18 Pa C.S.A	13	F-1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): Dealing in proceeds of unlawful activities – 13 counts

Acts of the accused associated with this Offense: Commit a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represents the proceeds of unlawful activity, the person acts with the intent to promote the carrying on of the unlawful of the unlawful activity TO WIT: Starks did drive co-defendant Smith to meet a Pennsylvania State Trooper acting in an undercover capacity and receive a Pennsylvania State Employees Visa debit card with the intention to commit fraudulent transactions. Smith then did accompany co-defendant Starks on numerous occasions to various locations to complete fraudulent gift card purchases and ATM transactions with co-defendant Starks. Smith was observed through surveillance video being present and taking part in fraudulent gift card transactions
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts) Carter PSECU Account 03/23/17 (5 Counts).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	2	4101	A(3)	of the	18 Pa C.S.A	1	F-2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): Forgery - 1 count

Acts of the accused associated with this Offense: Utters any writing which of another without his authority TO WIT: Smith mobile deposited and or caused a mobile deposit of a check to the Ava Carter Pennsylvania State Employees Credit Union bank account bearing signatures that were not created by Ava Carter.

Carter PSECU Account 03/23/17 (1 count)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	3	4106	A(1)(IV)	of the	18 Pa C.S.A	13	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): Access Device Fraud – 13 Counts

Acts of the accused associated with this Offense: Uses an Access Device for another reason his use of the access device is unauthorized by the issuer or the device holder TO WIT: Smith and Co-defendant Starks did use an access device (Pennsylvania State Employees Credit Union Visa debit card) for a reason (fraud) that is unauthorized by the issuer (Pennsylvania State Employees Credit Union)

Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts) Carter PSECU Account 03/23/17 (5 Counts)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: //	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: Shakour	Middle: Shalik	Last: Smith

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input checked="" type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	4	4106	A(1)(IV)	of the	18 Pa.C.S. A	4	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): Attempt - Access Device Fraud – 4 Counts

Acts of the accused associated with this Offense: Uses an Access Device for another reason his use of the access device is unauthorized by the issuer or the device holder to wit: Smith and Co-defendant Starks did also attempt to use an access device (Pennsylvania State Employees Credit Union Visa debit card) for a reason (fraud) that is unauthorized by the issuer (Pennsylvania State Employees Credit Union) however these transactions were block by the issuer (Pennsylvania State Employees Credit Union).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	5	4120	A	of the	18 PA C.S.A	13	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): Identity Theft – 13 Counts

Acts of the accused associated with this Offense: Possess or uses, through any means, identifying information of another person without the consent of that other person to further any unlawful purpose TO WIT: Smith and Co-defendant Starks did use the identity of "Ava Carter" and "Nefeese Jackson" while completing fraudulent transactions with Pennsylvania State Employees Credit Union Visa debit cards.

Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts) Carter PSECU Account 03/23/17 (5 Counts)

Inchoate Offense	<input checked="" type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	6	4120	A	of the	18 PA C.S.A	4	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): Attempt Identity Theft – 4 Counts

Acts of the accused associated with this Offense: Possess or uses, through any means, identifying information of another person without the consent of that other person to further any unlawful purpose TO WIT Smith and Co-defendant Starks did attempt to use the identity of "Ava Carter" and "Nefeese Jackson" while completing fraudulent transactions with Pennsylvania State Employees Credit Union Visa debit cards however these transactions were block by the issuer (Pennsylvania State Employees Credit Union).

Carter PSECU Account 03/23/17 (2 Counts) 03/24/17 (2 Counts)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: Shakour	Middle: Shalik	Last: Smith

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	7	3922	1	of the	18 PA C.S.A	13	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): Theft by Deception – 13 Counts

Acts of the accused associated with this Offense: Creates or reinforces a false impression, including false impressions as to law, value, intention or other state of mind TO WIT: Smith and Co-defendant Starks were observed on video surveillance cameras at multiple locations completing fraudulent transactions with two separate Pennsylvania State Employees Visa debit cards and receiving US Currency or gift cards as a result of fraudulent transactions.
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts) Carter PSECU Account 03/23/17 (5 Counts)

<input type="checkbox"/> Inchoate Offense	<input checked="" type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
---	---	---	---

<input type="checkbox"/>	8	3922	1	of the	18 PA C.S.A	4	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): Attempt – Theft by Deception – 4 Counts

Acts of the accused associated with this Offense: Creates or reinforces a false impression, including false impressions as to law, value, intention or other state of mind TO WIT: Smith and Co-defendant Starks were observed on video surveillance cameras attempting to commit fraudulent transactions with two Pennsylvania State Employees Credit Union Visa debit cards however these transactions were blocked by the issuer (Pennsylvania State Employees Credit Union).
Carter PSECU Account 03/23/17 (2 Counts) 03/24/17 (2 Counts)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	9	3925	A	of the	18 PA C.S.A	13	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): Receiving Stolen Property – 13 Counts

Acts of the accused associated with this Offense: Intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen TO WIT: Smith and Co-defendant Starks were observed on video surveillance cameras at multiple locations committing fraudulent transactions with a Pennsylvania State Employees Visa debit card and receiving US Currency or gift cards.
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts) Carter PSECU Account 03/23/17 (5 Counts)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: Shakour	Middle: Shalik	Last: Smith

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	10	7512		of the	18 PA C.S.A	4	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **Criminal Use of Communication Facility – 4 Counts**

Acts of the accused associated with this Offense: Uses a communication facility to commit, cause or facilitate the commission or the attempt there of any crime which constitutes a felony TO WIT: Defendant Smith did use a cell phone to communicate through phone calls, text messages, direct messages through Instagram and remotely deposit a check for the use of fraudulent transactions.

Contact with Tpr. Brown on 03/23/17 (phone calls, text messages and Instagram messages) 03/23/17 (mobile deposit of check into Ava Carter PSECU bank account) and 03/24/17 (phone call).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	11	4105	A(1)	of the	18 PA C.S.A	1	M-1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **Bad Checks – 1 Count**

Acts of the accused associated with this Offense: Commits an offense if he issues or passes a check or similar sight order for the payment of money, knowing that it will not be honored by the drawee TO WIT: Defendant Smith mobile deposited a check or caused a mobile deposit of a check to be made knowing that the check would be returned due to non-sufficient funds.

1 Count - Check deposited into Ava Carter PSECU bank account on 03/23/17

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903
---	--	---	--

<input type="checkbox"/>	12	3922	A (1) (2) (3)	of the	18 PA C.S.A	1	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **Conspiracy (Theft by Deception)**

Acts of the accused associated with this Offense: In that the Defendant on multiple occasions did conspire with another person(s) to commit a crime, to wit, Theft by Deception, in that the Defendant intentionally obtained or withheld property of another with a value exceeding \$2000 by creating or reinforcing a false impression, including false impressions as to law, value, intention or other state of mind in violation of 18 Pa. C.S. A. § 3922(a)(1)(2) and/or (3).

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: Shakour	Middle: Shalik	Last: Smith

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 5.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

[Handwritten Signature] 537
[Handwritten Signature] 542

 (Signature of Affiant)

AND NOW, on this date 30 May 2017 I certify that the complaint has been properly completed and verified.

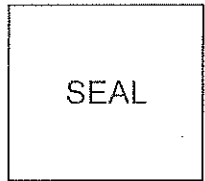
An affidavit of probable cause must be completed before a warrant can be issued.

34-1-06

 (Magisterial District Court Number)

[Handwritten Signature]

 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name:	First: Shakour	Middle: Shalik	Last: Smith

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Justin Clarke #533, (Affiant Clarke) is a sworn Special Agent with the Pennsylvania Office of Attorney General (PAOAG), Bureau of Criminal Investigations Organized Crime Section, located at 1000 Madison Ave, Suite 310, Norristown, Pennsylvania 19403.

Affiant Clarke has received training from the Pennsylvania State Police that includes the Class "A" certification course for Wiretapping and Electronic Surveillance conducted by the Pennsylvania State Police and Pennsylvania Office of the Attorney General in 2016. Your Affiant was certified to employ such techniques while conducting criminal investigations, maintaining "A" certification number A-5136. Since obtaining the Class "A" certification, your Affiant has participated in consensual investigations.

Your Co-Affiant, Gabriel Fabian #542, (Affiant Fabian) is a sworn Special Agent with the Pennsylvania Office of Attorney General (PAOAG), Bureau of Criminal Investigations Organized Crime Section, located at 1000 Madison Ave, Suite 310, Norristown, Pennsylvania 19403.

In February 2016, while monitoring a confidential Instagram Account regarding a separate investigation, Affiant Clarke noticed two separate Instagram users, who were using the Instagram handles "bankrollquaa" and "bankrollkiloooo," posting logos of banks and requesting other Instagram users to contact them (by "liking" photographs or private messaging through Instagram) if the other Instagram users maintained bank accounts with specific financial institutions.

After reviewing numerous photographs posted on "bankrollquaa" and "bankrollkiloooo" Instagram's page, it was believed that both live and/or frequent the North Philadelphia area. The profile picture depicted under the "bankrollquaa" Instagram account was later identified as Quadir James Burley (PA SID 41364408) (Quadir). The profile picture depicted under the "bankrollkiloooo" Instagram account was later identified as Shakour Shaik Smith (PA33919310) (Smith). Instagram users "bankrollquaa" and "bankrollkiloooo" would typically remove or delete posts, which requested other Instagram members to contact about various banking institutions, after they were posted on their respective pages for only a few hours.

On Thursday, 03/02/17, Affiant Clarke "liked" a post from "bankrollkiloooo" that requested Instagram users who maintain Pennsylvania State Employee Credit Union (PSECU) bank accounts. Through the "Instagram direct message" (Instagram DM) feature, "bankrollkiloooo" and Affiant Clarke, posing as Instagram user "avatherealone1" (a female), had an online conversation about using his PSECU bank account to make money. "Bankrollkiloooo" explained in the conversation that "avatherealone1" (Affiant Clarke) would have to provide her online banking information, debit card and PIN number to "bankrollkiloooo" and that "bankrollkiloooo" would then mobile deposit a check into the account and then strategically make ATM withdrawals and gift card purchases over two days. After the ATM withdrawals and gift card purchases were completed, "bankrollkiloooo" instructed "avatherealone1" (Affiant Clarke) to report his debit card stolen. "Bankrollkiloooo" also informed "avatherealone1" (Affiant Clarke) that once the ATM withdrawals and gift card purchases were completed; he would receive money in exchange for participation in this fraud scheme.

On Thursday, 03/09/17, Supervisory Special Agent William Ralston (SSA Ralston), Affiant's Clarke and Fabian met with PSECU Fraud Investigator Matthew Cassel (Cassel) and multiple employees from PSECU at PSECU headquarters. At this time, they discussed multiple fraud investigations that PSECU was currently investigating. At this meeting, PSECU management agreed to provide multiple PSECU fictitious bank accounts and PSECU debit cards to PAOAG investigators to assist in the investigation.

On Tuesday, 03/21/17 at approximately 1504 hours, Affiant Clarke began an Instagram DM chat with Instagram user "bankrollquaa" under the Instagram account handle "nef__215g." The following is the conversation that occurred through Instagram:

1504 **Affiant Clarke** - Was you the one to talk to if I got a bank acct nd wanna make money

1508 "**bankrollqua**" – Yes

1513 **Affiant Clarke** – Wassup wit it? I got an acct what do I need to do.

I aint tryin to get scammed

1514 "**bankrollqua**" – What bank you with and you won't

1516 **Affiant Clarke** –PSECU what do I need to do

1548 "**bankrollquaa**" - What's ya number

1553 "**bankrollquaa**" - ?

1605 **Affiant Clarke** – 215-613-4761

1633 **Affiant Clarke** - ?

Pennsylvania Office of Attorney General Narcotics Agent Nehemiah Haigler (NA Haigler) was assigned to act in an undercover role and pose as "Nefeese Jackson" while using the Instagram handle "nef__215g." PSECU provided a bank account and Visa debit (4305 8600 1603 0596) in the name of Nefeese Jackson.

On Tuesday, 03/21/17, at approximately 1638 hours, NA Haigler received a phone call from 267- 348-7547. NA Haigler missed the phone call and returned the phone call to 267-348-7547. During this phone call an unknown male explained his plan to defraud PSECU to NA Haigler in the following manner: NA Haigler needed to provide his online banking information, his debit card and PIN Number; the unknown male would then deposit a check into his account, and subsequently withdraw the money. The unknown male explained that NA Haigler should report his debit card stolen once all of the transactions were completed and that afterwards they would split the money that the unknown male received.

Shortly after this phone call, NA Haigler received the following text from 267-348-7547:

-lg

-lgotta do it before 6

-Bro

NA Hagler responded:

-Yo trying to hit you from another jack

On Tuesday, 03/21/17, at approximately 1653 hours, NA Haigler called 267- 348-7547 and spoke with the same unknown male as the previous phone conversation. This phone call was recorded. During this phone call, NA Haigler and the unknown male agreed to meet at the in the parking lot of the Chick-Fil-A in the Cheltenham Mall. The unknown male stated that he wanted to get all of NA Haigler's banking information when they met.

At this time, SSA Ralston, Affiant Clarke, Special Agent Joseph Chiaro (SA Chiaro), Narcotic Agents Ashley McAteer, Melissa Tamarro, and Affiant Fabian traveled to the Cheltenham Mall located at 2385 W. Cheltenham Avenue Wyncote, Pa 19095 and began conducting surveillance in the Chick-Fil-A parking lot.

On Tuesday, 03/21/17, from 1723 hours through 1905 hours, multiple text messages and phone calls were exchanged between NA Haigler and the same unknown male using the 267-348-7547 phone number.

On Tuesday, 03/21/17, at approximately 1823 hours, NA Haigler arrived at the Chick-Fil-A.

On Tuesday, 03/21/17, at approximately 1905 hours, NA Haigler called 267- 348-7547 and spoke with the unknown male. During this phone call the unknown male informed NA Haigler that he was at Chick-Fil-A. This phone call was recorded.

At this time, Affiant Clarke and Affiant Fabian observed a black Chevrolet four door sedan with tinted windows, a distinctive air freshener hanging from the rear view mirror, distinctive scuffs and scrapes on the vehicle, and bearing temporary Pennsylvania registration 2699803. (It was later determined that this vehicle was reported stolen from a location in Philadelphia on 11/04/16)

On Tuesday, 03/21/17, at approximately 1913 hours, the aforementioned Chevrolet sedan pulled near NA Haigler's vehicle. At this time, a black male who had been identified as Quadir Burley (Quadir) exited the driver's seat of the aforementioned Chevrolet sedan and began speaking with NA Haigler outside of NA Haigler's vehicle. Approximately half way through the conversation NA Haigler invited Qaudir into his vehicle. An unidentified person was observed in the front passenger seat of the aforementioned vehicle. Quadir identified the passenger as his "girl." The entire conversation between NA Haigler and Quadir was recorded. A brief summary of the conversation of the in person meeting can be summarized as follows:

Quadir outlined how a check will be deposited into NA Haigler's account. Quadir detailed how he strategically withdrawals the money out of the account on certain days because the bank's staff isn't working. After the withdrawals are completed, Quadir will meet up with NA Haigler to split the profits. Quadir instructed NA Haigler to report his debit card lost/stolen to PSECU after Quadir is done making the transactions. Near the end of this conversation NA Haigler provided Quadir the PSECU Visa debit card (4305 8600 1603 0596) in the name of Nefeese Jackson, the Pin # associated with debit card, the online banking user ID, and the online banking password. Quadir took the PSECU debit card and said, *"...I'm about to call my folks and get some paperwork now."*

The conversation ended at approximately 1920 hours.

Quadir then entered the aforementioned Chevrolet sedan and departed the vicinity of the Cheltenham Mall. Surveillance agents followed Qaudir's vehicle until he made an abrupt stop near the intersection of Broad Street and Lindley Street in Philadelphia. Surveillance was then terminated.

On Tuesday, 03/21/17, at approximately 1936 hours, Quadir's vehicle made an abrupt stop near the intersection of Broad Street and Lindley Street. At this time, Quadir called NA Haigler from phone number 267-348-7547. This phone call was recorded. During this phone call, Quadir questioned NA Haigler about the passwords needed to log onto his PSECU bank account.

On Wednesday, 03/22/17, Matthew Cassel, PSECU Fraud Investigator informed Affiant Clarke through e-mail that the PSECU card assigned to Nefeese Jackson was used at the Sunoco gas station located at 2634 N. Broad Street Philadelphia, Pa 19132 . The debit card was used for a purchase of \$1.00; however the purchase was declined due to insufficient funds. The card was then used twice at an ATM, which is located at the same address of the Sunoco for the purpose of a balance inquiry.

On Wednesday, 03/22/17 at approximately 1636 hours, a check written from Wells Fargo Bank NA, Routing No. 031000503 Account No. 044115689 to Nefeese C. Jackson in the amount of \$6,200.00 was mobile deposited into the PSECU account belonging to Nefeese Jackson. "Work" was written on the memo line. (Definition of mobile deposit - Using the camera in a phone to **deposit** a check in a bank. An application in the phone takes a picture of the front and back of the check, and both images, along with the dollar value, are transmitted to the bank.)

On Thursday, 03/23/17 at approximately 1400 hours, Affiant's Clarke & Fabian, Pennsylvania Office of Attorney General Supervisory SSA Ralston, SA Chiaro, Special Agent Kevin Schofield (SA Schofield) and Pennsylvania State Police Troopers Jovanna Brown (Tpr. Brown) Mark Salerno, Nick Scrivani, Ryan Smith, Jamie Sparenga met at the Pennsylvania State Police Belmont Barracks. At this time, Affiant Clarke and Affiant Fabian explained the investigation to everyone present.

Tpr. Brown was assigned to act in an undercover role and pose as "Ava Carter" while using the Instagram handle "avatherealone1." PSECU provided a bank account and Visa debit (4305 8600 1691 1233) in the name of Ava M Carter.

On Thursday, 03/23/17, at approximately 1518 hours, using the Instagram account handle "avatherealone1," Affiant Clarke started the following conversation with Instagram user "bankrollkilo000":

1518 - CLARKE – Hey I got my new card. Can I get money today

1519 – "bankrollkilo000" – What card

1520 – CLARKE - My new PSECU card

1528 – "bankrollkilo000" –Yes

- What's your number
- (screenshot of Nefeese Jackson PSECU account)
- I just did this one yesterday

1529 – "bankrollkilo000" - \$6200 cleared today

1530 – bankrollkilo000 - I need ya number though don't like ig talk

1532- CLARKE – I want sum

1532 – bankrollkilo000 – What's your number

-?

-And Way

- You be playing you played last time ..

1537 – CLARKE – 3024501533

- Work

- I gave u my number. This must be a scam.

1537 – bankrollkiloooo- A scam . Naw I just think you playing games

1538 – Clarke – (picture showing PSECU debit card)

1540 – bankrollkiloooo - Okay so Way I just texted you.. If we do it by 6 we can make \$6200 ..

1541 – bankrollkiloooo- Do you have online banking?

- You'll have a \$1000 today.

"bankrollkiloooo" then began communicating with Affiant Clarke/Tpr. Brown via text messaging from cell phone number 267-630-1462.

On Thursday, 03/23/17, at approximately 1550 hours, an unknown male using phone number 267-630-1462 called Tpr. Brown at telephone number 302-450-1533. The unknown person asked Tpr. Brown how long she had the bank account, if she is able to mobile deposit, and what her spending limits are. The unknown male requested Tpr. Brown's online banking user name, password, and PIN number. The unknown male identified himself as "Keife." This phone call was recorded.

On Thursday, 03/23/17, at approximately 1557 hours, the same unknown male using phone number 267-630-1462 called Tpr. Brown at telephone number 302-450-1533. During this phone call, the unknown male informed Tpr. Brown that her account is 'not enrolled.' The unknown male talked about "Ava Carter" trusting him. The unknown male instructed Tpr. Brown to logon to her PSECU through the website. This phone call was recorded.

On Thursday, 03/23/17, at approximately 1619 hours, the same unknown male using phone number 267-630-1462 called Tpr. Brown at telephone number 302-450-1533. Tpr. Brown informed the unknown person that she enrolled the account online, and the unknown male again asked for Tpr. Brown's online banking user name and password. The unknown male stated that he had already signed onto Tpr. Brown's account. The unknown male instructed Tpr. Brown to call PSECU and have the mobile deposited set up. This phone call was recorded.

Through a text message, Tpr Brown and the unknown person agreed to meet at the "Chilli's" parking lot at 175 East City Ave, Bala Cynwd, Pa 19004 at 1710 hours.

On Thursday, 03/23/17, at approximately 1730 hours, a silver Nissan Altima bearing PA registration KHJ-3613 arrived at the meet site. At this time, a B/M who was been identified as Shakour Smith (Smith) exited the aforementioned vehicle and approached and greeted Tpr. Brown. The vehicle was also occupied by two other B/M's who were later identified as Ikeem Starks (Starks) (driver) and Gregory Nathaniel Jackson (backseat passenger). Tpr Brown and Smith had a conversation that can be summarized as follows:

Smith stated that he wanted to make Tpr. Brown feel comfortable. Smith identified himself as "Kiefe." Smith stated that he wanted to answer any questions that Tpr. Brown had. Smith explained that he will mobile deposit a check into her PSECU bank account. The amount of the check would be \$6,200.00. Smith would take a picture of the front of the check and back of the check to complete the mobile deposit. Smith was not sure if the check will clear right away, but the check would definitely clear by tomorrow. Smith talked about another account with which he was currently committing the fraud. (At this time, Smith was showing screenshot photographs to Tpr. Brown of banks accounts that upon which he had already completed this fraud scheme. It is believed that the account that he referenced and showed screenshot photographs was the Nefese Jackson PSECU account.) Smith informed Tpr. Brown that he would complete a \$300.00 ATM withdrawal and then go to Walmart and purchase (3) three \$500.00 gift cards. Smith guaranteed Tpr. Brown that if she did not get \$1,000.00 that day, she would receive \$1,000.00 by the next day. Smith informed Tpr. Brown that she can monitor the transactions on her account as Smith completed the transactions. Smith told Tpr. Brown that he would keep her posted. Smith told Tpr. Brown that they would split the money that will be obtained from this fraud scheme by stating, *"...It's just me and you, I get the check made, I pay them up front"*. Smith instructed Tpr. Brown to call the bank and report the debit card stolen/lost after the transactions. The purpose of reporting the debit card stolen/lost would be to save Tpr. Brown from having to pay the money back. Smith stated that the bank will do a "petty investigation" and see that it's a male making the transactions and the bank won't take any further action. Smith stated, *"... one thing is for sure, I have been doing this for a long time. I never had nobody go to jail...never. I work with a lot of people...I don't got no job."* Tpr. Brown asked Smith if he did it one or two times. Smith responded, *"Fuck one or two time, I have done it hundreds of times. I am a pro at what I do..."* Smith stated that he is going to leave the meet site and go get the check. Smith told Tpr. Brown that he is from "North". Smith talked about the possibility of having Tpr. Brown recruit people to participate in this fraud in the future. Smith told Tpr. Brown that he did, *"probably 15 cards with them"* (PSECU). Smith stated that he goes to Police and Fire ATMs to make ATM withdrawals.

The entire in person conversation between Smith and "Carter" (Tpr. Brown) was recorded.

Near the end of this conversation Tpr. Brown provided the PSECU Visa debit card (4305 8600 1691 1233) belonging to Ava Carter to Smith.

On Thursday, 03/23/17, a check written from the Freedom Credit Union, Routing No. 236084751 Account No. 0060029733 to Ava M Carter in the amount of \$5,400.00 was mobile deposited into the PSECU account belonging to Ava Carter. "Work" was written on the memo line.

On Monday, 03/27/17, Matthew Cassel, PSECU Fraud Investigator provided Affiant Clarke with a list of fraudulent transactions that occurred on the Ava Carter PSECU debit card number 4305 8600 1691 1233.

The list of transactions are as follows:

03/23/17 19:25:33 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$280.00 – Transaction Blocked

(On Thursday, 03/23/17, at 1942 hours, Smith sent Tpr. Brown (302-450-1533) a text message from 267-630-1462 stating, "My phone on 1% trying to get it off so I need you to move fast". At this time, Smith was trying to have Tpr. Brown call PSECU and verify the purchases because the debit issued to Ava Carter was being declined.)

(A surveillance photograph was obtained from Walmart that shows Shakour Smith at the ATM inside the Walmart at the above listed time and date)

03/23/17 19:51:14 Subway Restaurant Attempted Purchase \$14.56

03/23/17 20:13:05 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$80.00

03/23/17 20:13:44 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$200.00

03/23/17 20:14:33 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$200.00 Transaction Exceeded

(For these Wal-Mart attempted/successful ATM transactions, Surveillance photographs were obtained from Walmart showing Shakour Smith inside the Wal-Mart store at the time of the successful ATM withdrawals)

03/23/17 20:20:20 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 - POS purchase \$498.00

03/23/17 20:21:12 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 - POS purchase \$498.00

03/23/17 20:22:00 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124- POS purchase \$498.00

(For these Wal-Mart POS purchases, surveillance photographs were obtained from Wal-Mart showing Ikeem Starks completing gift card purchases.)

03/24/17 00:34:09 PNC Bank ATM (inside of WaWa) 193 Belmont Avenue Bala Cynwyd, Pa 19004. ATM Withdrawal 280.00 Permanent Restriction

03/24/17 00:35:09 PNC Bank ATM (inside of WaWa) 193 Belmont Avenue Bala Cynwyd, Pa 19004. ATM Withdrawal Inquiry

(Surveillance video was obtained from inside the WaWa Store where the PNC Bank ATM is located. The video shows Shakour Smith and Ikeem Starks using two separate ATM machines at the same time. It should be noted that a PSECU debit card in the name of Nefeese Jackson was used at the same time. It appears that Starks received the \$500.00 from the PNC Bank (WaWa ATM) from the Jackson PSECU card, while Smith checked the balance on the Carter PSECU card Video surveillance shows Starks operating a silver sedan resembling the Nissan Altima that he was operating at the time of the undercover meet, Smith is a passenger in the vehicle.)

03/24/17 00:54:42 Wal-Mart Store #4687 275 N. Gulph Road King of Prussia, Pa 19406 POS Purchase \$.78 Permanent Restriction

(Surveillance photographs were obtained from Wal-mart showing Shakour Smith and Ikeem Starks standing at cash register around the time that this transactions was attempted.)

On 03/28/17, the check that was mobile deposited into Ava Carter's account was returned due PSECU unable to locate the account, thus creating a loss of approximately \$1,780.00 for PSECU.

On Thursday, 03/23/17 at approximately 0445 hours, Affiant Clarke and Affiant Fabian located the black Chevrolet sedan bearing temporary Pennsylvania registration 2699-803 in the vicinity of 1524 W. Lehigh Avenue Philadelphia, Pa 19132. At this time, Affiant Clarke and Affiant Fabian looked into the vehicle through the front windshield and observed a piece of paper that resembled an ATM receipt in the front cup holder. At this time, the car and VIN number were photographed. The VIN # was partially obscured. (2G1WG5E30D11*****)

On Friday, 03/24/17 at approximately 1333 hours, NA Haigler attempted to call Quadir (267-348-7547). At this time, Quadir answered the phone call. NA Haigler and Quadir discussed the debit card transactions and Quadir informed NA Haigler that NA Haigler would receive \$1,500.00 for participating in the fraud scheme. Quadir and NA Haigler agreed to meet early Sunday morning, 03/26/17. This phone call was recorded.

On Sunday, 03/26/17, NA Haigler attempted to call Quadir multiple times at telephone no. 267- 348-7547. After a few phone calls, it appeared that Quadir blocked NA Haigler's phone because when NA Haigler attempted to call Quadir, the phone call would go directly to voice mail; however, when Quadir's phone number was called from a different phone, it would not go straight to voicemail. Affiant Clarke also attempted to contact Quadir "bankrollquaa" through "Instagram Direct Messenger". Once Affiant Clarke contacted Quadir from the Instagram account "nef__215g", it appeared that Quadir blocked that account, as Instagram user "nef__215g" could no longer view "bankrollquaa's" Instagram page. However, any other Instagram user was still able to view "bankrollquaa's" Instagram page.

On Monday, 03/27/17, Matthew Cassel, PSECU Fraud Investigator provided Affiant Clarke with a list of fraudulent transactions that occurred on Nefeese Jackson PSECU debit card number 4305 8600 1603 0596.

The transactions are as follows:

03/21/17 19:48:29 Sunoco Store No. 0363328604 \$1.00 NSF (not sufficient funds)

(Surveillance video could not be obtained for this transaction)

03/21/17 19:49:55 2634-44 N. Broad Street -0.00 Invalid PIN Entry Balance Inquiry

03/21/17 19:20:23 2634-44 N. Broad Street - 0.000 Approved Balance Inquiry

(Surveillance video could not be obtained for these transactions)

03/23/17 12:37:58 2201 Hunting Park Avenue Philadelphia \$500.00 ATM Withdrawal

(Surveillance could not be obtained for this transaction. This transaction occurred inside the 39th Philadelphia Police District; however the camera inside the district is not currently operational.)

03/23/17 12:55:29 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 POS Purchase \$497.95

03/23/17 12:56:21 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 POS purchase \$497.95

03/23/17 12:57:25 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 POS purchase \$498.00

(For these Wal-Mart POS purchases, surveillance photographs were obtained from Wal-Mart showing Ikeem Starks and Shakour Smith completing gift card purchases.)

03/23/17 14:46:51 Sunoco Store No. 0363171002 \$1.00 Approved

(Surveillance video could not be obtained for this transaction)

03/24/17 00:34:29 PNC Bank (WaWa ATM) 193 Belmont Avenue Bala Cynwd, Pa \$500.00 ATM Withdrawal

(Surveillance video was obtained from inside the WaWa Store where the PNC Bank ATM is located. The video shows Shakour Smith and Ikeem Starks using two separate ATM machines at the same time. It appears that Starks received the \$500.00 from the PNC Bank (WaWa ATM) from the Jackson PSECU card, while Smith checked the balance on the Carter PSECU card. It should be noted that a PSECU debit card in the name of Ava Carter was used at the same time. Video surveillance shows Starks operating a silver sedan resembling the Nissan Altima that he was operating at the time of the undercover meet, Smith is a passenger in the vehicle.)

03/24/17 00:55:20 Wal-Mart Store #4687 275 N. Gulph Road King of Prussia, Pa 19406 POS Purchase \$497.95

03/24/17 00:56:48 Wal-Mart Store #4687 275 N. Gulph Road King of Prussia, Pa 19406 POS Purchase \$497.95

03/24/17 00:58:14 Wal-Mart Store #4687 275 N. Gulph Road King of Prussia, Pa 19406 POS Purchase \$498.00

(Surveillance was obtained for the Wal-Mart purchases that were made on 03/24/17 from 00:55:00 – 00:58:14.)
(Surveillance photographs show Ikeem Starks and Shakour Smith completing gift card purchases.)

03/24/17 01:50:28 Sunoco 0363328604 \$1.00 Approved

(Surveillance video could not be obtained for this transaction)

03/24/17 02:04:39 – 02:05:09 (five separate transactions from Lyft.com – all denied)

(Surveillance video could not be obtained for these transactions)

On Wednesday, 03/24/17, the check that was mobile deposited into the Nefeese Jackson's account was returned due to Non-Sufficient Funds, thus creating a loss of approximately \$4,000.00 for PSECU.

On Wednesday, 03/29/17, PAOAG Analyst Janet Smilowski researched the partial VIN # obtained from the Chevrolet sedan which Quadir was observed operating and which was bearing Pennsylvania registration 2699803. Analyst Smilowski was able to identify the complete VIN # (2G1WG5E30D118403) and determined that the vehicle was listed in NCIC as "stolen."

On Friday, 03/31/17 at approximately 0730 hours, Affiant Clarke and Affiant Fabian began conducting surveillance in the vicinity of 1524 W. Lehigh Avenue Philadelphia, Pa 19132.

Philadelphia Police Officers Cedric Carter (6235) and Mark Austin (6876) were positioned nearby to assist Affiant Fabian and Affiant Clarke with surveillance.

On Friday, 03/31/17 at approximately, 1040 hours, Affiant Clarke and Affiant Fabian observed the black Chevrolet sedan bearing temporary Pennsylvania registration 2699-803 arrive in the vicinity of 1524 W. Lehigh Avenue. This was the same vehicle that Quadir operated when he arrived at the Cheltenham Mall Chick-Fil-A on 03/22/17 to

meet NA Haigler to receive the undercover PSECU Visa debit card. This vehicle was identified by the make, model, rims, tint, and temporary registration.

At this time, Affiant Clarke notified Police Officers Carter and Alston of the presence of the aforementioned stolen vehicle. Officers Carter and Alston initiated a traffic stop on the aforementioned vehicle near the intersection of 16th Street and Lehigh Avenue.

James Burley (James), Quadir's father was found to be operating the stolen vehicle. Will Bush (PA 25943404) was found to be in the front driver's passenger seat. James was arrested by the Philadelphia Police Department and charged with offense related to driving the stolen vehicle (1614089335). James stated that the vehicle belonged to his son, Quadir. Shortly thereafter, Quadir arrived at the location of the traffic stop and retrieved papers related to the vehicle and handed them to Officer Carter.

Your Affiants submits that the information contained herein is sufficient to provide probable cause for the issuance of an arrest warrant for Dealing in Unlawful Proceeds, Access Device Fraud, Identity Theft & Theft by Unlawful Taking.

I, Justin E. Clarke / Gabriel J. Fabian, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

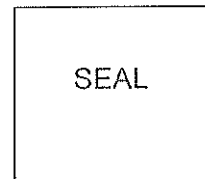
Justin E. Clarke 533
Gabriel J. Fabian 542

(Signature of Affiant)

Sworn to me and subscribed before me 30 day of May 2022

5/30/17 Date [Signature], Magisterial District Judge

My commission expires first Monday of January, 2022





Co-Defendant Data Sheet

Please provide the following information for each co-defendant.

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: SHAKOUR	Middle: SHALIK	Last: SMITH

Complaint/Incident Number BNG000217	Co-Defendant # <u>1</u>
IKEEM MAURICE STARKS (Name)	
5120 KNOX STREET (Home Street Address)	
PHILADELPHIA, PA 19144 (City, State, & ZIP Code)	(Telephone #)

Complaint/Incident Number BNG000217	Co-Defendant # <u>2</u>
QUADIR JAMES BURLEY (Name)	
1524 W. LEHIGH AVENUE (Home Street Address)	
PHILADELPHIA, PA 19132 (City, State, & ZIP Code)	(Telephone #)

Complaint/Incident Number	Co-Defendant # _____
(Name)	
(Home Street Address)	
(City, State, & ZIP Code)	(Telephone #)

Complaint/Incident Number	Co-Defendant # _____
(Name)	
(Home Street Address)	
(City, State, & ZIP Code)	(Telephone #)

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: Montgomery



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 38-1-06
MDJ: Hon. Henry Schireson
Address: 925 Montgomery Avenue
Narbeth, PA 19072
Telephone: (610) 664-5262

DEFENDANT: (NAME and ADDRESS):

Quadir James Burley
First Name Middle Name Last Name Gen.
1524 W. Lehigh Avenue
Philadelphia, Pa 19132

NCIC Extradition Code Type

- 1-Felony Full
- 2-Felony Ltd.
- 3-Felony Surrounding States
- 4-Felony No Ext.
- 5-Felony Pend.
- A-Misdemeanor Full
- B-Misdemeanor Limited
- C-Misdemeanor Surrounding States
- D-Misdemeanor No Extradition
- E-Misdemeanor Pending
- Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number SID Request Lab Services?
BNG000217 YES NO

GENDER DOB 01/09/1999 POB Add'l DOB / / Co-Defendant(s)
 Male First Name Middle Name Last Name Gen.
 Female

AKA
RACE White Asian Black Native American Unknown

ETHNICITY Hispanic Non-Hispanic Unknown

HAIR COLOR
 GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown)
 BLK (Black) ONG (Orange) WHI (White) XXX (Unk/Bald) GRN (Green) PNK (Pink)
 BLN (Blonde / Strawberry)

EYE COLOR
 BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray)
 HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown)

Driver License State PA License Number 32 295 883 Expires: Suspended WEIGHT (lbs.)

DNA YES NO DNA Location 230

FBI Number MNU Number Ft. HEIGHT In.

Defendant Fingerprinted YES NO 5 6

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

Plate # State Hazmat Registration Sticker (MM/YY) / Comm'l Veh. Ind. School Veh. Oth. NCIC Veh. Code Reg. same as Def.

VIN Year Make Model Style Color

Office of the attorney for the Commonwealth Approved Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

Heather Castellino
(Name of the attorney for the Commonwealth)

Heather Castellino
(Signature of the attorney for the Commonwealth)

5 12 2017
(Date)

I, Justin E. Clarke / Gabriel J. Fabian
(Name of the Affiant)

Badge #533 / Badge #542
(PSP/MPOETC -Assigned Affiant ID Number & Badge #)

PA Office Of Attorney General
(Identify Department or Agency Represented and Political Subdivision)
do hereby state: (check appropriate box)

PA 0222400
(Police Agency ORI Number)

1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [413] 193 Belmont Ave 19401 and multiple other locations within Montgomery and Philadelphia Counties. (Subdivision Code) (Place-Political Subdivision)

in Montgomery & Philadelphia County [22 & 51] on or about 03/21/17 thru 03/24/17
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: Quadir	Middle: James	Last: Burley

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 5.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

[Handwritten Signature] 533
[Handwritten Signature] 542
 (Signature of Affiant)

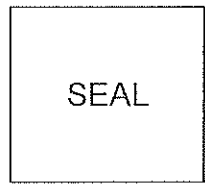
_____ (Date)

AND NOW, on this date 5-30-17 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

38-1-06
 (Magisterial District Court Number)

 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: //	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: Quadir	Middle: James	Last: Burley

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input checked="" type="checkbox"/>	1	5111	A(1)	of the	18 Pa C.S.A	8	F-1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): Dealing in proceeds of unlawful activities – 1 count

Acts of the accused associated with this Offense: Commit a financial transaction with knowledge that the property involved , including stolen or illegally obtained property, represents the proceeds of unlawful activity, the person acts with the intent to promote the carrying on of the unlawful of the unlawful activity TO WIT: Burley did drive and meet with a Pennsylvania Office of Attorney General Narcotics Agent acting in an undercover capacity to receive a Pennsylvania State Employees Credit Union (PSECU) Visa debit card, that the defendant related that he was going to use in fraudulent transactions. Burley did promise NA Haigler half the amount of money that was generated from the fraudulent transactions. Defendant Burley did cause eight fraudulent transactions on the Nefeese Jackson that caused a loss of approximately \$4,000.00 to PSECU.
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	2	4101	A(3)	of the	18 Pa C.S.A	1	F-2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): Forgery - 1 count

Acts of the accused associated with this Offense: The intent to defraud or with knowledge of facilitating a fraud, tters any writing which of another without his authority TO WIT: Defendant Burley mobile deposited or caused a mobile deposit to be made to the Nefeese Jackson Pennsylvania State Employees Credit Union bank account bearing signatures that were not created by Nefeese Jackson.
Jackson PSECU Account 03/22/17 (1 count)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	3	4106	A(1)(IV)	of the	18 Pa C.S.A	8	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): Conspiracy to Commit Access Device Fraud – 8 Counts

Acts of the accused associated with this Offense: with the intent of promoting or facilitating the commission of a crime, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime, Uses an Access Device for another reason , the use of the access device to obtain or attempt to obtain is unauthorized by the issuer or the device holder TO WIT: Burley did recruit Nefeese Jackson through his Instagram account and made statements vocalizing his intentions to commit fraud with the Nefeese Jackson Pennsylvania State Employees Credit Union Visa debit card. Defendant Burley did cause eight fraudulent transactions to occur on the Nefeese Jackson Pennsylvania State Employees Credit Union bank account creating a loss of approximately \$4,000.00. These fraudulent transactions were not authorized by the Issuer (Pennsylvania State Employee Credit Union)
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: //	OTN/LiveScan Number	Complaint/Incident Number: BNG000217
Defendant Name	First: Quadir	Middle: James	Last: Burley

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	4	4120	A	of the	18 Pa.C.S.A	8	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **Conspiracy to commit Identity Theft- 8 counts**

Acts of the accused associated with this Offense: with the intent of promoting or facilitating the commission of a crime, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime.
 Possess or uses, through any means, identifying information of another person without the consent of that other person to further any unlawful purpose TO WIT: Burley did recruit Nefese Jackson through his Instagram account and made statements vocalizing his intentions to commit fraud with the Nefese Jackson Pennsylvania State Employees Credit Union Visa debit card. Defendant Burley did cause eight fraudulent transactions to occur on the Nefese Jackson Pennsylvania State Employees Credit Union bank account. These fraudulent transactions were not authorized by the issuer (Pennsylvania State Employee Credit Union)
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	5	3922	1	of the	18 PA.C.S.A	8	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **Conspiracy to Commit Theft by Deception- 8 counts**

Acts of the accused associated with this Offense: Creates or reinforces a false impression, including false impressions as to law, value, intention or other state of mind TO WIT: with the intent of promoting or facilitating the commission of a crime, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons the planning or commission of such crime or of an attempt or solicitation to commit such crime.
 Defendant Burley deposited or caused to be deposited a check that he knew would be returned due to non-sufficient funds. Defendant Burley cause eight fraudulent transactions to occur on the Nefese Jackson Pennsylvania State Employees Credit Union bank account causing a loss of approximately \$4,000.00 .
Jackson PSECU Account 03/23/17 (4 Counts) 03/24/17 (4 Counts)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	6	7512		of the	18 PA.C.S.A	4	F-3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **Criminal Use of Communication Facility – 4 Counts**

Acts of the accused associated with this Offense: Uses a communication facility to commit, cause or facilitate the commission or the attempt there of any crime which constitutes a felony TO WIT: Defendant Burley did use a phone to communicate through phone calls, text messages, direct messages through Instagram and remotely deposit a check for the use of fraudulent transactions.
Contact with NA Haigler on 03/21/17(phone calls, text messages and Instagram messages) 03/22/17 (mobile deposit of check into Nefese Jackson PSECU bank account) and 03/24/17 (phone call).
1 count – phone calls, 1 count –text messages, 1 count –Instagram messages, 1 count – mobile deposit of check into Nefese Jackson



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: //	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: Quadir	Middle: James	Last: Burley

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> Lead?	7	4105	A (1)	of the	18 PA C.S.A	1	F-3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **Bad Checks – 1 Count**

Acts of the accused associated with this Offense: Commits an offense if he issues or passes a check or similar sight order for the payment of money, knowing that it will not be honored by the drawee TO WIT: Defendant Burley mobile deposited a check or caused a mobile deposit of a check to be made knowing that the check would be returned due to non-sufficient funds.

1 Count - Check deposited into Nefeese Jackson PSECU bank account on 03/22/17

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> Lead?	8	3922	A (1) (2) (3)	of the	18 PA C.S.A	1	F-3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **Conspiracy (Theft by Deception)**

Acts of the accused associated with this Offense: In that the Defendant on multiple occasions did conspire with another person(s) to commit a crime, to wit, Theft by Deception, in that the Defendant intentionally obtained or withheld property of another with a value exceeding \$2000 by creating or reinforcing a false impression, including false impressions as to law, value, intention or other state of mind in violation of 18 Pa. C.S. A. § 3922(a)(1)(2) and/or (3).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> Lead?									
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name:	First: Quadir	Middle: James	Last: Burley

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Justin Clarke #533, (Affiant Clarke) is a sworn Special Agent with the Pennsylvania Office of Attorney General (PAOAG), Bureau of Criminal Investigations Organized Crime Section, located at 1000 Madison Ave, Suite 310, Norristown, Pennsylvania 19403.

Affiant Clarke has received training from the Pennsylvania State Police that includes the Class "A" certification course for Wiretapping and Electronic Surveillance conducted by the Pennsylvania State Police and Pennsylvania Office of the Attorney General in 2016. Your Affiant was certified to employ such techniques while conducting criminal investigations, maintaining "A" certification number A-5136. Since obtaining the Class "A" certification, your Affiant has participated in consensual investigations.

Your Co-Affiant, Gabriel Fabian #542, (Affiant Fabian) is a sworn Special Agent with the Pennsylvania Office of Attorney General (PAOAG), Bureau of Criminal Investigations Organized Crime Section, located at 1000 Madison Ave, Suite 310, Norristown, Pennsylvania 19403.

In February 2016, while monitoring a confidential Instagram Account regarding a separate investigation, Affiant Clarke noticed two separate Instagram users, who were using the Instagram handles "bankrollquaa" and "bankrollkiloooo," posting logos of banks and requesting other Instagram users to contact them (by "liking" photographs or private messaging through Instagram) if the other Instagram users maintained bank accounts with specific financial institutions.

After reviewing numerous photographs posted on "bankrollquaa" and "bankrollkiloooo" Instagram's page, it was believed that both live and/or frequent the North Philadelphia area. The profile picture depicted under the "bankrollquaa" Instagram account was later identified as Quadir James Burley (PA SID 41364408) (Quadir). The profile picture depicted under the "bankrollkiloooo" Instagram account was later identified as Shakour Shalik Smith (PA33919310) (Smith). Instagram users "bankrollquaa" and "bankrollkiloooo" would typically remove or delete posts, which requested other Instagram members to contact about various banking institutions, after they were posted on their respective pages for only a few hours.

On Thursday, 03/02/17, Affiant Clarke "liked" a post from "bankrollkiloooo" that requested Instagram users who maintain Pennsylvania State Employee Credit Union (PSECU) bank accounts. Through the "Instagram direct message" (Instagram DM) feature, "bankrollkiloooo" and Affiant Clarke, posing as Instagram user "avatherealone1" (a female), had an online conversation about using his PSECU bank account to make money. "Bankrollkiloooo" explained in the conversation that "avatherealone1" (Affiant Clarke) would have to provide her online banking information, debit card and PIN number to "bankrollkiloooo" and that "bankrollkiloooo" would then mobile deposit a check into the account and then strategically make ATM withdrawals and gift card purchases over two days. After the ATM withdrawals and gift card purchases were completed, "bankrollkiloooo" instructed "avatherealone1" (Affiant Clarke) to report his debit card stolen. "Bankrollkiloooo" also informed "avatherealone1" (Affiant Clarke) that once the ATM withdrawals and gift card purchases were completed; he would receive money in exchange for participation in this fraud scheme.

On Thursday, 03/09/17, Supervisory Special Agent William Ralston (SSA Ralston), Affiant's Clarke and Fabian met with PSECU Fraud Investigator Matthew Cassel (Cassel) and multiple employees from PSECU at PSECU headquarters. At this time, they discussed multiple fraud investigations that PSECU was currently investigating. At this meeting, PSECU management agreed to provide multiple PSECU fictitious bank accounts and PSECU debit cards to PAOAG investigators to assist in the investigation.

On Tuesday, 03/21/17 at approximately 1504 hours, Affiant Clarke began an Instagram DM chat with Instagram user "bankrollquaa" under the Instagram account handle "nef__215g." The following is the conversation that occurred through Instagram:

1504 **Affiant Clarke** - Was you the one to talk to if I got a bank acct nd wanna make money

1508 **"bankrollqua"** – Yes

1513 **Affiant Clarke** – Wassup wit it? I got an acct what do I need to do.

I aint tryin to get scammed

1514 **"bankrollqua"** – What bank you with and you won't

1516 **Affiant Clarke** –PSECU what do I need to do

1548 **"bankrollquaa"** - What's ya number

1553 **"bankrollquaa"** - ?

1605 **Affiant Clarke** – 215-613-4761

1633 **Affiant Clarke** - ?

Pennsylvania Office of Attorney General Narcotics Agent Nehemiah Haigler (NA Haigler) was assigned to act in an undercover role and pose as "Nefeese Jackson" while using the Instagram handle "nef__215g." PSECU provided a bank account and Visa debit (4305 8600 1603 0596) in the name of Nefeese Jackson.

On Tuesday, 03/21/17, at approximately 1638 hours, NA Haigler received a phone call from 267- 348-7547. NA Haigler missed the phone call and returned the phone call to 267-348-7547. During this phone call an unknown male explained his plan to defraud PSECU to NA Haigler in the following manner: NA Haigler needed to provide his online banking information, his debit card and PIN Number; the unknown male would then deposit a check into his account, and subsequently withdraw the money. The unknown male explained that NA Haigler should report his debit card stolen once all of the transactions were completed and that afterwards they would split the money that the unknown male received.

Shortly after this phone call, NA Haigler received the following text from 267-348-7547:

-lg

-lgotta do it before 6

-Bro

NA Hagler responded:

-Yo trying to hit you from another jack

On Tuesday, 03/21/17, at approximately 1653 hours, NA Haigler called 267- 348-7547 and spoke with the same unknown male as the previous phone conversation. This phone call was recorded. During this phone call, NA Haigler and the unknown male agreed to meet at the in the parking lot of the Chick-Fil-A in the Cheltenham Mall. The unknown male stated that he wanted to get all of NA Haigler's banking information when they met.

At this time, SSA Ralston, Affiant Clarke, Special Agent Joseph Chiaro (SA Chiaro), Narcotic Agents Ashley McAteer, Melissa Tamarro, and Affiant Fabian traveled to the Cheltenham Mall located at 2385 W. Cheltenham Avenue Wyncote, Pa 19095 and began conducting surveillance in the Chick-Fil-A parking lot.

On Tuesday, 03/21/17, from 1723 hours through 1905 hours, multiple text messages and phone calls were exchanged between NA Haigler and the same unknown male using the 267-348-7547 phone number.

On Tuesday, 03/21/17, at approximately 1823 hours, NA Haigler arrived at the Chick-Fil-A.

On Tuesday, 03/21/17, at approximately 1905 hours, NA Haigler called 267- 348-7547 and spoke with the unknown male. During this phone call the unknown male informed NA Haigler that he was at Chick-Fil-A. This phone call was recorded.

At this time, Affiant Clarke and Affiant Fabian observed a black Chevrolet four door sedan with tinted windows, a distinctive air freshener hanging from the rear view mirror, distinctive scuffs and scrapes on the vehicle, and bearing temporary Pennsylvania registration 2699803. (It was later determined that this vehicle was reported stolen from a location in Philadelphia on 11/04/16)

On Tuesday, 03/21/17, at approximately 1913 hours, the aforementioned Chevrolet sedan pulled near NA Haigler's vehicle. At this time, a black male who had been identified as Quadir Burley (Quadir) exited the driver's seat of the aforementioned Chevrolet sedan and began speaking with NA Haigler outside of NA Haigler's vehicle. Approximately half way through the conversation NA Haigler invited Qaudir into his vehicle. An unidentified person was observed in the front passenger seat of the aforementioned vehicle. Quadir identified the passenger as his "girl." The entire conversation between NA Haigler and Quadir was recorded. A brief summary of the conversation of the in person meeting can be summarized as follows:

Quadir outlined how a check will be deposited into NA Haigler's account. Quadir detailed how he strategically withdrawals the money out of the account on certain days because the bank's staff isn't working. After the withdrawals are completed, Quadir will meet up with NA Haigler to split the profits. Quadir instructed NA Haigler to report his debit card lost/stolen to PSECU after Quadir is done making the transactions. Near the end of this conversation NA Haigler provided Quadir the PSECU Visa debit card (4305 8600 1603 0596) in the name of Nefeese Jackson, the Pin # associated with debit card, the online banking user ID, and the online banking password. Quadir took the PSECU debit card and said, "...I'm about to call my folks and get some paperwork now."

The conversation ended at approximately 1920 hours.

Quadir then entered the aforementioned Chevrolet sedan and departed the vicinity of the Cheltenham Mall. Surveillance agents followed Qaudir's vehicle until he made an abrupt stop near the intersection of Broad Street and Lindley Street in Philadelphia. Surveillance was then terminated.

On Tuesday, 03/21/17, at approximately 1936 hours, Quadir's vehicle made an abrupt stop near the intersection of Broad Street and Lindley Street. At this time, Quadir called NA Haigler from phone number 267-348-7547. This phone call was recorded. During this phone call, Quadir questioned NA Haigler about the passwords needed to log onto his PSECU bank account.

On Wednesday, 03/22/17, Matthew Cassel, PSECU Fraud Investigator informed Affiant Clarke through e-mail that the PSECU card assigned to Nefeese Jackson was used at the Sunoco gas station located at 2634 N. Broad Street Philadelphia, Pa 19132 . The debit card was used for a purchase of \$1.00; however the purchase was declined due to insufficient funds. The card was then used twice at an ATM, which is located at the same address of the Sunoco for the purpose of a balance inquiry.

On Wednesday, 03/22/17 at approximately 1636 hours, a check written from Wells Fargo Bank NA, Routing No. 031000503 Account No. 044115689 to Nefeese C. Jackson in the amount of \$6,200.00 was mobile deposited into the PSECU account belonging to Nefeese Jackson. "Work" was written on the memo line. (Definition of mobile deposit - Using the camera in a phone to **deposit** a check in a bank. An application in the phone takes a picture of the front and back of the check, and both images, along with the dollar value, are transmitted to the bank.)

On Thursday, 03/23/17 at approximately 1400 hours, Affiant's Clarke & Fabian, Pennsylvania Office of Attorney General Supervisory SSA Ralston, SA Chiaro, Special Agent Kevin Schofield (SA Schofield) and Pennsylvania State Police Troopers Jovanna Brown (Tpr. Brown) Mark Salerno, Nick Scrivani, Ryan Smith, Jamie Sparenga met at the Pennsylvania State Police Belmont Barracks. At this time, Affiant Clarke and Affiant Fabian explained the investigation to everyone present.

Tpr. Brown was assigned to act in an undercover role and pose as "Ava Carter" while using the Instagram handle "avatherealone1." PSECU provided a bank account and Visa debit (4305 8600 1691 1233) in the name of Ava M Carter.

On Thursday, 03/23/17, at approximately 1518 hours, using the Instagram account handle "avatherealone1," Affiant Clarke started the following conversation with Instagram user "bankrollkilo000":

1518 - CLARKE – Hey I got my new card. Can I get money today

1519 – "bankrollkilo000" – What card

1520 – CLARKE - My new PSECU card

1528 – "bankrollkilo000" –Yes

- What's your number
- (screenshot of Nefeese Jackson PSECU account)
- I just did this one yesterday

1529 – "bankrollkilo000" - \$6200 cleared today

1530 – bankrollkilo000 - I need ya number though don't like ig talk

1532- CLARKE – I want sum

1532 – bankrollkilo000 – What's your number

-?

-And Way

- You be playing you played last time ..

1537 – CLARKE – 3024501533

- Work

- I gave u my number. This must be a scam.

1537 – bankrollkiloooo- A scam . Naw I just think you playing games

1538 – Clarke – (picture showing PSECU debit card)

1540 – bankrollkiloooo - Okay so Way I just texted you.. If we do it by 6 we can make \$6200 ..

1541 – bankrollkiloooo- Do you have online banking?

- You'll have a \$1000 today.

"bankrollkiloooo" then began communicating with Affiant Clarke/Tpr. Brown via text messaging from cell phone number 267-630-1462.

On Thursday, 03/23/17, at approximately 1550 hours, an unknown male using phone number 267-630-1462 called Tpr. Brown at telephone number 302-450-1533. The unknown person asked Tpr. Brown how long she had the bank account, if she is able to mobile deposit, and what her spending limits are. The unknown male requested Tpr. Brown's online banking user name, password, and PIN number. The unknown male identified himself as "Keife." This phone call was recorded.

On Thursday, 03/23/17, at approximately 1557 hours, the same unknown male using phone number 267-630-1462 called Tpr. Brown at telephone number 302-450-1533. During this phone call, the unknown male informed Tpr. Brown that her account is 'not enrolled.' The unknown male talked about "Ava Carter" trusting him. The unknown male instructed Tpr. Brown to logon to her PSECU through the website. This phone call was recorded.

On Thursday, 03/23/17, at approximately 1619 hours, the same unknown male using phone number 267-630-1462 called Tpr. Brown at telephone number 302-450-1533. Tpr. Brown informed the unknown person that she enrolled the account online, and the unknown male again asked for Tpr. Brown's online banking user name and password. The unknown male stated that he had already signed onto Tpr. Brown's account. The unknown male instructed Tpr. Brown to call PSECU and have the mobile deposited set up. This phone call was recorded.

Through a text message, Tpr Brown and the unknown person agreed to meet at the "Chilli's" parking lot at 175 East City Ave, Bala Cynwd, Pa 19004 at 1710 hours.

On Thursday, 03/23/17, at approximately 1730 hours, a silver Nissan Altima bearing PA registration KHJ-3613 arrived at the meet site. At this time, a B/M who was been identified as Shakour Smith (Smith) exited the aforementioned vehicle and approached and greeted Tpr. Brown. The vehicle was also occupied by two other B/M's who were later identified as Ikeem Starks (Starks) (driver) and Gregory Nathaniel Jackson (backseat passenger). Tpr Brown and Smith had a conversation that can be summarized as follows:

Smith stated that he wanted to make Tpr. Brown feel comfortable. Smith identified himself as "Kiefe." Smith stated that he wanted to answer any questions that Tpr. Brown had. Smith explained that he will mobile deposit a check into her PSECU bank account. The amount of the check would be \$6,200.00. Smith would take a picture of the front of the check and back of the check to complete the mobile deposit. Smith was not sure if the check will clear right away, but the check would definitely clear by tomorrow. Smith talked about another account with which he was currently committing the fraud. (At this time, Smith was showing screenshot photographs to Tpr. Brown of banks accounts that upon which he had already completed this fraud scheme. It is believed that the account that he referenced and showed screenshot photographs was the Nefese Jackson PSECU account.) Smith informed Tpr. Brown that he would complete a \$300.00 ATM withdrawal and then go to Walmart and purchase (3) three \$500.00 gift cards. Smith guaranteed Tpr. Brown that if she did not get \$1,000.00 that day, she would receive \$1,000.00 by the next day. Smith informed Tpr. Brown that she can monitor the transactions on her account as Smith completed the transactions. Smith told Tpr. Brown that he would keep her posted. Smith told Tpr. Brown that they would split the money that will be obtained from this fraud scheme by stating, "...It's just me and you, I get the check made, I pay them up front". Smith instructed Tpr. Brown to call the bank and report the debit card stolen/lost after the transactions. The purpose of reporting the debit card stolen/lost would be to save Tpr. Brown from having to pay the money back. Smith stated that the bank will do a "petty investigation" and see that it's a male making the transactions and the bank won't take any further action. Smith stated, "...one thing is for sure, I have been doing this for a long time. I never had nobody go to jail...never. I work with a lot of people...I don't got no job." Tpr. Brown asked Smith if he did it one or two times. Smith responded, "Fuck one or two time, I have done it hundreds of times. I am a pro at what I do..." Smith stated that he is going to leave the meet site and go get the check. Smith told Tpr. Brown that he is from "North". Smith talked about the possibility of having Tpr. Brown recruit people to participate in this fraud in the future. Smith told Tpr. Brown that he did, "probably 15 cards with them" (PSECU). Smith stated that he goes to Police and Fire ATMs to make ATM withdrawals.

The entire in person conversation between Smith and "Carter" (Tpr. Brown) was recorded.

Near the end of this conversation Tpr. Brown provided the PSECU Visa debit card (4305 8600 1691 1233) belonging to Ava Carter to Smith.

On Thursday, 03/23/17, a check written from the Freedom Credit Union, Routing No. 236084751 Account No. 0060029733 to Ava M Carter in the amount of \$5,400.00 was mobile deposited into the PSECU account belonging to Ava Carter. "Work" was written on the memo line.

On Monday, 03/27/17, Matthew Cassel, PSECU Fraud Investigator provided Affiant Clarke with a list of fraudulent transactions that occurred on the Ava Carter PSECU debit card number 4305 8600 1691 1233.

The list of transactions are as follows:

03/23/17 19:25:33 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$280.00 – Transaction Blocked

(On Thursday, 03/23/17, at 1942 hours, Smith sent Tpr. Brown (302-450-1533) a text message from 267-630-1462 stating, "My phone on 1% trying to get it off so I need you to move fast". At this time, Smith was trying to have Tpr. Brown call PSECU and verify the purchases because the debit issued to Ava Carter was being declined.)

(A surveillance photograph was obtained from Walmart that shows Shakour Smith at the ATM inside the Walmart at the above listed time and date)

03/23/17 19:51:14 Subway Restaurant Attempted Purchase \$14.56 .

03/23/17 20:13:05 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$80.00

03/23/17 20:13:44 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$200.00

03/23/17 20:14:33 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 ATM Withdrawal \$200.00 Transaction Exceeded

(For these Wal-Mart attempted/successful ATM transactions, Surveillance photographs were obtained from Walmart showing Shakour Smith inside the Wal-Mart store at the time of the successful ATM withdrawals)

03/23/17 20:20:20 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 - POS purchase \$498.00

03/23/17 20:21:12 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 - POS purchase \$498.00

03/23/17 20:22:00 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124- POS purchase \$498.00

(For these Wal-Mart POS purchases, surveillance photographs were obtained from Wal-Mart showing Ikeem Starks completing gift card purchases.)

03/24/17 00:34:09 PNC Bank ATM (inside of WaWa) 193 Belmont Avenue Bala Cynwyd, Pa 19004. ATM Withdrawal 280.00 Permanent Restriction

03/24/17 00:35:09 PNC Bank ATM (inside of WaWa) 193 Belmont Avenue Bala Cynwyd, Pa 19004. ATM Withdrawal Inquiry

(Surveillance video was obtained from inside the WaWa Store where the PNC Bank ATM is located. The video shows Shakour Smith and Ikeem Starks using two separate ATM machines at the same time. It should be noted that a PSECU debit card in the name of Nefeese Jackson was used at the same time. It appears that Starks received the \$500.00 from the PNC Bank (WaWa ATM) from the Jackson PSECU card, while Smith checked the balance on the Carter PSECU card Video surveillance shows Starks operating a silver sedan resembling the Nissan Altima that he was operating at the time of the undercover meet, Smith is a passenger in the vehicle.)

03/24/17 00:54:42 Wal-Mart Store #4687 275 N. Gulph Road King of Prussia, Pa 19406 POS Purchase \$.78 Permanent Restriction

(Surveillance photographs were obtained from Wal-mart showing Shakour Smith and Ikeem Starks standing at cash register around the time that this transactions was attempted.)

On 03/28/17, the check that was mobile deposited into Ava Carter's account was returned due PSECU unable to locate the account, thus creating a loss of approximately \$1,780.00 for PSECU.

On Thursday, 03/23/17 at approximately 0445 hours, Affiant Clarke and Affiant Fabian located the black Chevrolet sedan bearing temporary Pennsylvania registration 2699-803 in the vicinity of 1524 W. Lehigh Avenue Philadelphia, Pa 19132. At this time, Affiant Clarke and Affiant Fabian looked into the vehicle through the front windshield and observed a piece of paper that resembled an ATM receipt in the front cup holder. At this time, the car and VIN number were photographed. The VIN # was partially obscured. (2G1WG5E30D11*****)

On Friday, 03/24/17 at approximately 1333 hours, NA Haigler attempted to call Quadir (267-348-7547). At this time, Quadir answered the phone call. NA Haigler and Quadir discussed the debit card transactions and Quadir informed NA Haigler that NA Haigler would receive \$1,500.00 for participating in the fraud scheme. Quadir and NA Haigler agreed to meet early Sunday morning, 03/26/17. This phone call was recorded.

On Sunday, 03/26/17, NA Haigler attempted to call Quadir multiple times at telephone no. 267- 348-7547. After a few phone calls, it appeared that Quadir blocked NA Haigler's phone because when NA Haigler attempted to call Quadir, the phone call would go directly to voice mail; however, when Quadir's phone number was called from a different phone, it would not go straight to voicemail. Affiant Clarke also attempted to contact Quadir "bankrollquaa" through "Instagram Direct Messenger". Once Affiant Clarke contacted Quadir from the Instagram account "nef__215g", it appeared that Quadir blocked that account, as Instagram user "nef__215g" could no longer view "bankrollquaa's" Instagram page. However, any other Instagram user was still able to view "bankrollquaa's" Instagram page.

On Monday, 03/27/17, Matthew Cassel, PSECU Fraud Investigator provided Affiant Clarke with a list of fraudulent transactions that occurred on Nefeese Jackson PSECU debit card number 4305 8600 1603 0596.

The transactions are as follows:

03/21/17 19:48:29 Sunoco Store No. 0363328604 \$1.00 NSF (not sufficient funds)

(Surveillance video could not be obtained for this transaction)

03/21/17 19:49:55 2634-44 N. Broad Street -0.00 Invalid PIN Entry Balance Inquiry

03/21/17 19:20:23 2634-44 N. Broad Street - 0.000 Approved Balance Inquiry

(Surveillance video could not be obtained for these transactions)

03/23/17 12:37:58 2201 Hunting Park Avenue Philadelphia \$500.00 ATM Withdrawal

(Surveillance could not be obtained for this transaction. This transaction occurred inside the 39th Philadelphia Police District; however the camera inside the district is not currently operational.)

03/23/17 12:55:29 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 POS Purchase \$497.95

03/23/17 12:56:21 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 POS purchase \$497.95

03/23/17 12:57:25 Wal-Mart Store #5103 4600 Roosevelt Boulevard Philadelphia, Pa 19124 POS purchase \$498.00

(For these Wal-Mart POS purchases, surveillance photographs were obtained from Wal-Mart showing Ikeem Starks and Shakour Smith completing gift card purchases.)

03/23/17 14:46:51 Sunoco Store No. 0363171002 \$1.00 Approved

(Surveillance video could not be obtained for this transaction)

03/24/17 00:34:29 PNC Bank (WaWa ATM) 193 Belmont Avenue Bala Cynwd, Pa \$500.00 ATM Withdrawal

(Surveillance video was obtained from inside the WaWa Store where the PNC Bank ATM is located. The video shows Shakour Smith and Ikeem Starks using two separate ATM machines at the same time. It appears that Starks received the \$500.00 from the PNC Bank (WaWa ATM) from the Jackson PSECU card, while Smith checked the balance on the Carter PSECU card. It should be noted that a PSECU debit card in the name of Ava Carter was used at the same time. Video surveillance shows Starks operating a silver sedan resembling the Nissan Altima that he was operating at the time of the undercover meet, Smith is a passenger in the vehicle.))

03/24/17 00:55:20 Wal-Mart Store #4687 275 N. Gulph Road King of Prussia, Pa 19406 POS Purchase \$497.95

03/24/17 00:56:48 Wal-Mart Store #4687 275 N. Gulph Road King of Prussia, Pa 19406 POS Purchase \$497.95

03/24/17 00:58:14 Wal-Mart Store #4687 275 N. Gulph Road King of Prussia, Pa 19406 POS Purchase \$498.00

(Surveillance was obtained for the Wal-Mart purchases that were made on 03/24/17 from 00:55:00 – 00:58:14.)
(Surveillance photographs show Ikeem Starks and Shakour Smith completing gift card purchases.)

03/24/17 01:50:28 Sunoco 0363328604 \$1.00 Approved

(Surveillance video could not be obtained for this transaction)

03/24/17 02:04:39 – 02:05:09 (five separate transactions from Lyft.com – all denied)

(Surveillance video could not be obtained for these transactions)

On Wednesday, 03/24/17, the check that was mobile deposited into the Nefese Jackson's account was returned due to Non-Sufficient Funds, thus creating a loss of approximately \$4,000.00 for PSECU.

On Wednesday, 03/29/17, PAOAG Analyst Janet Smilowski researched the partial VIN # obtained from the Chevrolet sedan which Quadir was observed operating and which was bearing Pennsylvania registration 2699803. Analyst Smilowski was able to identify the complete VIN # (2G1WG5E30D118403) and determined that the vehicle was listed in NCIC as "stolen."

On Friday, 03/31/17 at approximately 0730 hours, Affiant Clarke and Affiant Fabian began conducting surveillance in the vicinity of 1524 W. Lehigh Avenue Philadelphia, Pa 19132.

Philadelphia Police Officers Cedric Carter (6235) and Mark Austin (6876) were positioned nearby to assist Affiant Fabian and Affiant Clarke with surveillance.

On Friday, 03/31/17 at approximately, 1040 hours, Affiant Clarke and Affiant Fabian observed the black Chevrolet sedan bearing temporary Pennsylvania registration 2699-803 arrive in the vicinity of 1524 W. Lehigh Avenue. This was the same vehicle that Quadir operated when he arrived at the Cheltenham Mall Chick-Fil-A on 03/22/17 to

meet NA Haigler to receive the undercover PSECU Visa debit card. This vehicle was identified by the make, model, rims, tint, and temporary registration.

At this time, Affiant Clarke notified Police Officers Carter and Alston of the presence of the aforementioned stolen vehicle. Officers Carter and Alston initiated a traffic stop on the aforementioned vehicle near the intersection of 16th Street and Lehigh Avenue.

James Burley (James), Quadir's father was found to be operating the stolen vehicle. Will Bush (PA 25943404) was found to be in the front driver's passenger seat. James was arrested by the Philadelphia Police Department and charged with offense related to driving the stolen vehicle (1614089335). James stated that the vehicle belonged to his son, Quadir. Shortly thereafter, Quadir arrived at the location of the traffic stop and retrieved papers related to the vehicle and handed them to Officer Carter.

Your Affiants submits that the information contained herein is sufficient to provide probable cause for the issuance of an arrest warrant for Dealing in Unlawful Proceeds, Forgery, Access Device Fraud, Identity Theft, Theft by Unlawful Taking, Criminal Use of a Communication Facility & Bad Checks.

I, Justin E. Clarke / Gabriel J. Fabian, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

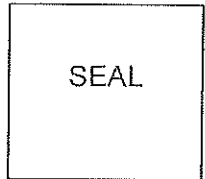
Gabriel J. Fabian S33
Gabriel J. Fabian S42

(Signature of Affiant)

Sworn to me and subscribed before me 30th day of May 2017

5-30-17 Date [Signature], Magisterial District Judge

My commission expires first Monday of January, 2022





Please provide the following information for each co-defendant.

Co-Defendant Data Sheet

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: QUADIR	Middle: JAMES	Last: BURLEY

Complaint/Incident Number BNG00217	Co-Defendant # <u>1</u>
SHAKOUR SMITH	
(Name)	
5450 WISSAHICKON AVENUE	
(Home Street Address)	
PHILADELPHIA, PA 19144	(Telephone #)
(City, State, & ZIP Code)	

Complaint/Incident Number BNG000217	Co-Defendant # <u>2</u>
IKEEM STARKS	
(Name)	
5126 KNOXX STREET	
(Home Street Address)	
PHILADELPHIA, PA 19144	(Telephone #)
(City, State, & ZIP Code)	

Complaint/Incident Number	Co-Defendant # _____
(Name)	
(Home Street Address)	
(City, State, & ZIP Code)	(Telephone #)

Complaint/Incident Number	Co-Defendant # _____
(Name)	
(Home Street Address)	
(City, State, & ZIP Code)	(Telephone #)