#### **COMMONWEALTH OF** POLICE CRIMINAL COMPLAINT PENNSYLVANIA COMMONWEALTH OF PENNSYLVANIA COUNTY OF: Montgomery VS. Magisterial District Number: 38-1-06 MDJ: Hon. Henry Schireson DEFENDANT: (NAME and ADDRESS): Address: 925 Montgomery Avenue Ikeem = Maurice: Starks Narbeth, PA 19072 First Name Middle Name Last Name Telephone: (610) 🤛 5126 Knox Street Philadelphia, Pa 19144 NCIC Extradition Code Type ☐ 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 DEFENDANTIDENTIFICATION INFORMATION Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number SID Request Lab Services? BNG000217 ☐ YES ☒ NO GENDER DOB 09/20/1991 POB Add'l DOB Co-Defendant(s) Male First Name Middle Name Last Name Gen. ☐ Female **AKA** RACE ☐ White \_\_/ Native American Unknown ETHNICITY Non-Hispanic Hispanic Unknown HAIR COLOR GRY (Gray) RED (Red/Aubn.) BLU (Blue) ☑ PLE (Purple) - ■ ■ BRO (Brown) SDY (Sandy) 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 License Number 30 594 207 Expires: Suspended State PA WEIGHT (lbs.) DNA ☐ YES ☒ NO 185 **DNA Location** FBI Number MNU Number Ft HEIGHT. In Defendant-Fingerprinted ... ☐ YES Eingerprint Classification: DEFENDANT VEHICLE INFORMATION: State Hazmat Registration Oth. NCIC Veh. Code Comm'l Veh. School Rea. Plate # Sticker (MM/YY) Ind. Veh. same as Def. VIN Year Make Model Style Color П

Heather Castellino (Name of the attorney for the Commonwealth) Justin E. Clarke / Gabriel J. Fabian - Badge #533 / Badge #542 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # PA Office Of Attorney General PA 0222400 (Identify Department or Agency Represented and Political Subdivision) (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 193 Belmont Ave 19401 and multiple other locations within Montgomery Counties. (Subdivision Code) (Place-Political Subdivision) in Montgomery & [22 & 51] on or about 03/21/17 thru 03/24/17

(County Code)

(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

Philadelphia County

filing. See Pa.R.Crim.P. 507).



### POLICE CRIMINAL COMPLAINT

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Docket Number:	Date Filed: / /	OTN/LiveScan N	umber	1000000	omplaint/incident Number NG000217		
	First:		Middle:	Las	t:		
Defendant Name	Ikeem		Maurice	Sta	irks		
there is more than one (Set forth a <i>brief</i> summary o	offense, each of the facts sufficient summary case, you n	fense should be i to advise the defenda nust cite the specific s e included if known. I	numbered chror nt of the nature of t ection(s) and subs n addition, social s	iologically. he offense(s) char ection(s) of the sta ecurity numbers a			
Inchoate Attempt Offense 18 901 A		☐ Solicitat 18 902 A			Conspiracy 18 903		
□ 5111	A(1)		Pā C.S.A	13 F-1 Counts Gra	de NCIC Offense Code UCR/NIBRS Code		
PennDO1 Data	Number :-			☐ Safety Zone	☐ Work Zone		
Statute Description (inc	clude the name o	of statute or ordina	ance): Dealing	in proceeds o	f 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)							
■Inchoate		☐ Solicitat	ion		☐ Conspiracy		
Offense 18 901 A	-	18 902 A			18 903		
□ 2 3925	A	484348	PA.C.S.A 13	F <sub>∓</sub> 3	NCIC Offense Code UCR/NIBRS Code		
PennDOT Data	Accidents Number	CHON F7		] Safety Zone	Work Zone □		
Statute Description (in	clude the name o	of statute or ordina	ance): Receivin	g Stolen Prop	perty – 12 Counts		
knowing that it has bee	en stolen, or belie veillance camera card and receivir	eving that it has posses at multiple local ag US Currency o	robably been sto lions committing r gift cards.	olen TO WIT: S g fraudulent trai	poses of movable property of another Starks and Co-defendant Smith were ensactions with a Pennsylvania State		
Inchoate Attempt Offense 18 901 A		☐ Solicitat 18 902 A			☑ Conspiracy 18 903		
3 4106  Lead? Offense# S	A(1)(	<b>文字五世史名文</b> 文	Pa C.S.A 13	F-3	NCIC Offense Code UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident Number			] Safety Zone	☐ Work Zone		
Statute Description (in	clude the name o	of statute or ordina	ance): Access I	Device Fraud	– 13 Counts		
unauthorized by the is	suer or the device mployees Credit mployees Credit	e holder TO WIT: Union Visa debit Union)	Starks and Co- card) for a reas	defendant Smi on (fraud) that i	eason his use of the access device is the did use an access device is unauthorized by the issuer		

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Docket Number:	Date Filed: / /	OTN/LiveScan Nu	mber		110000000000000000000000000000000000000	aint/Incident )00217	Number	
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Defendant Name	Ikeem	N	<b>Aaurice</b>	S	Starks			
The acts committed by there is more than one (Set forth a <i>brief</i> summary of more, is not sufficient. In a sage of the victim at the time be listed. If the identity of an	offense, each of the facts sufficient ummary case, you n	fense should be no to advise the defendant nust cite the specific se to included if known. In	IMbered CNIC of the nature o ction(s) and sub addition, social	nOlOgically. the offense(s) chesection(s) of the security numbers	harged. A statute(s s and fina	citation to the or ordinance incial informat	statute(s) vio	lated, without olated. The
Inchoate Attempt Offense 18 901 A		Solicitation 18 902 A			□ c	onspiracy 3 903		
☐ 4 4106  Lead? Offense# Se	A(1)(	1998 - HARRI	Pa C.S. A	4 F	-3 Grade	NCIC Offense	e Code UC	R/NIBRS Code
PennDOT Data	Accident			☐ Safety Zone			☐ Work Zon	ə 
Statute Description (inc								
Acts of the accused as unauthorized by the iss device (Pennsylvania State Er Employees Credit Unic Carter PSECU Account 0	suer or the device State Employees nployees Crediten).	e holder to wit: Star Credit Union Visa Union) however the	rks and Co-d debit card) fo	etendant Smil or a reason (fr	tn did ai aud) tha	iso attempt at is unauth	orized by th	e issuer
Inchoate.		Solicitation 18 902 A	on			onspiracy 8 903		
5 4120 Lead? Offense# Se	A Subse	B. 25. Sept. 1984	PA C.S.A	3 E-3 Counts Gra	ide 1	ICIC Offense Co	ode UCR	/NIBRS Code
PennDOT Data	Accident! 			☐ Safety Zone			☐ Work Zone	•
Statute Description (inc								
Acts of the accused as without the consent of the "Ava Carter" and "Nefees cards.  Jackson PSECU Account	at other person to e Jackson" while	further any unlawful p completing fraudulent	transactions	with Pennsylvar	o-deler nia State	Employees	na ase me la	CHEELY OF
Inchoate Attempt Offense 18 901 A		Solicitation	on			Conspiracy 8 903		
□ 6 4120	A			1 F-3	3000	1012.01	-da Hon	MIDDS Code
PennDOT Data	ection Subs Accident N Number	ection PA	Statute (Title)	Counts Gra	T	NCIC Offense C	□ Work Zone	/NIBRS Code
(if applicable) Statute Description (in	clude the name	of statute or ordina	nce): Attemp	t Identity Th	eft – 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)								



					MINAL COMPLAIN
Docket Number:	Date Filed: / /	OTN/LiveScan Number	E-49	Complaint/In BNG00021	cident Number 7
	First:	Middle		ist:	
Defendant Name	Ikeem	Maur	rice S	tarks	
there is more than one (Set forth a <i>brief</i> summary of more, is not sufficient. In a s	offense, each of f the facts sufficient lummary case, you m	ffense should be number to advise the defendant of the	red chronologically. nature of the offense(s) ch ) and subsection(s) of the s on, social security numbers	arged. A citatio tatute(s) or ord and financial ir 3.1 – 213.7.)	ated, if appropriate. When not the statute(s) violated, without linance(s) allegedly violated. The normation (e.g. PINs) should not
Increate ☐ Attempt ☐ Offense ☐ 18 901 A		Solicitation 18 902 A	·	☐ Conspir 18 903	acy
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Statute Description (inc	clude the name o	of statute or ordinance):	Theft by Deception -	- 13 Counts	5
value, intention or other s multiple locations comp	tate of mind TO Wooleting fraudulen	s Offense: Creates or rein /IT: Starks and Co-defen t transactions with two s a result of fraudulent tran ts) 03/24/17 (4 Counts) Car	dant Smith were obse eparate Pennsylvania nsactions.	rved on vide State Emplo	o surveillance cameras at byees Visa debit cards and
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PennDOT Data	Accident		☐ Safety Zone		☐ Work Zone
Statute Description (inc	clude the name o	of statute or ordinance):	Attempt – Theft by D	eception –	4 Counts
value, intention or other s	state of mind TO W raudulent transa- re blocked by the	e issuer (Pennsylvania S	dant Smith were obse ania State Employees	rved on vide Credit Unio	alse impressions as to law, eo surveillance cameras en Visa debit cards however
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Lead? Offense# S PennDOT Data (if applicable)	Accident	ection in outline	☐ Safety Zone		☐ Work Zone
Statute Description (in	clude the name	of statute or ordinance):			
person(s) to commit a	crime, to wit, The xceeding \$2000	is Offense: In that the De eft by Deception, in that by creating or reinforcing n violation of 18 Pa. C.S	the Defendant intentic g a false impression, ii	nally optaine ncluding fals	conspire with another ed or withheld property of e impressions as to law,



## POLICE CRIMINAL COMPLAINT

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

- 2. 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.
- 3. 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.
- 4. This complaint consists of the preceding page(s) numbered  $\underline{1}$  through  $\underline{5}$ .

of Pennsylvania and we	ere contr <b>rrest ca</b>	ary to the A n be issue	Act(s) of the A	fter, were against the peace and dignity of the Commonwealth ssembly, or in violation of the statutes cited.  it of probable cause must be completed, sworn to before the
Life to the second seco		([	Date)	(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 ca	iuse mus	t be complet	ed before a wa	rrant can be issued.

SEAL



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

-Igotta 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 "bankrollkiloooo":

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

1519 - "bankrollkiloooo" - What card

1520 - CLARKE - My new PSECU card

1528 - "bankrollkiloooo" - Yes

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

1529 - "bankrollkiloooo" - \$6200 cleared today

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

1532- CLARKE - I want sum

1532 – bankrollkiloooo – 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 ganes
- 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 hewanted 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 39<sup>th</sup> 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 16<sup>th</sup> 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 L THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND COMMY KNOWLEDGE, INFORMATION AND BELIEF.	CORRECT TO J. S33 Mm 57	THE BEST
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My commission expires first Monday of January, 262 2—	SEAL	



## Please provide the following information for each co-defendant.

# Co-Defendant Data Sheet

Docket Number:	t Number: Date Filed: OTN		Gomplaint/Incident Number BNG000217
Defendant Name	First: IKEEM	Middle: MAURICE	Last: STARKS
Complaint/Incident Num BNG000217 SHAKOUR SMITH (Name)			Co-Defendan <u>t # 1</u>
5450 WISSAHICKO (Home Street Address)	ON AVENUE		
PHILADELPHIA, PA (City, State, & ZIP Code)		(Telephone #)	
Complaint/Incident Num BNG000217 QUADIR JAMES BL			Co-Defendan <u>t # 2</u>
(Name)  1524 W. LEHIGH A  (Home Street Address)			:
PHILADELPHIA, PA (City, State, & ZIP Code)	A 19132	(Telephone #)	
Gomplaint/Incident Nun	iber		Co-Defendant #
(Name)			
(Home Street Address)			
(City, State, & ZIP Code)		(Telephone #)	
Complaint/Incident Nun	nber		Co-Defendant #
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(Home Street Address)			
(City, State, & ZIP Code)		(Telephone #)	1

## **COMMONWEALTH OF** PENNSYLVANIA



# POLICE CRIMINAL COMPLAINT **COMMONWEALTH OF PENNSYLVANIA**

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Magisterial District Number: 38-1-06											
MDJ: Hon. Henry	•				DEFEND	ANT:		(NAME and	ADDRES	S):	
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Defendant Name	First: Shakour	Middle: <b>Shalil</b>		Last: <b>Smith</b>			
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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).							
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AOPC 412A - Rev. 07/10



			POL	ICE CRIMINAL COMPLAII	NT
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(if applicable)   Statute Description (inc	Number   clude the name o	f statute or ordinance): I	dentity Theft – 13 C	ounts	
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Inchoate ⊠ Attempt Offense 18 901 A		☐ Solicitation 18 902 A		☐ Conspiracy 18 903	
☐ 6 4120 Lead? Offense# Se	A Subsection	of the 18 PA C.	Big APP APP CONTRACTOR AND A CONTRACTOR OF THE APP AND A CONTRACTOR AND A	le NCIC Offense Code UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number		☐ Safety Zone	☐ Work Zone	
	peline-programme military conservation recognisms.	f statute or ordinance): /	Attempt Identity The	ft – 4 Counts	
without the consent of tha	t other person to fo d "Nefeese Jackso	urther any unlawful purpos on" while completing fraudu	e TO WIT Smith and Co- llent transactions with Pe	identifying information of another person -defendant Starks did attempt to use the ennsylvania State Employees Credit Union	)

AOPC 412A - Rev. 07/10 Page \_\_ of \_\_

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



### POLICE CRIMINAL COMPLAINT

5 1 (1)	Dete Filed	OTNE ivoScan A	lumbor	· A30004.		plaint/incident Number		
Docket Number:	Date Filed: / /	OTN/LiveScan N	lumber		■ ************************************	3000217		
	First:		Middle:		Last:			
Defendant Name	Shakour		Shalik		Smith			
there is more than one (Set forth a brief summary or	offense, each off f the facts sufficient to tummary case, you mu of the offense may be	ense should be advise the defenda ust cite the specific included if known. ablished, list only th	numbered chant of the nature section(s) and s ln addition, soc e last four digit	ronologicall of the offense ubsection(s) of al security nun	y. s) charged the statute bers and fi §§ 213.1 – :			
Inchoate		☐ Solicita 18 902 A				Conspiracy 18 903		
□ 7 3922	1		BPA C.S.A	13	F-3			
Lead? Offense# Se	ection Subsection Subsection	tion	PA Statute (Title)	Counts	Grade	NCIC Offense Code UCR/NIBRS Code		
(if applicable)	Number			☐ Safety Z		☐ Work Zone		
Statute Description (inc	clude the name of	f statute or ordin	ance): Theft	by Decepti	on – 13	Counts		
value, intention or other s multiple locations comp receiving US Currency	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)							
Inchoate ⊠ Attempt		☐ Solicita	tion			Conspiracy		
Offense 18 901 A		18 902 /				18 903		
□ 8 3922	1		BPA C.S.A		-3			
Lead? Offense# So PennDOT Data	ection Subsection Subsection	tion P.	A Statute (Title)	Counts  Safety Zo	Grade one	NCIC Offense Code UCR/NIBRS Code  Work Zone		
(if applicable) Statute Description (inc	Number   clude the name of	f statute or ordin	——   ance): Attem					
value, intention or other s attempting to commit f these transactions wer	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)							
Inchoate		☐ Solicita 18 902 /				Conspiracy 18 903		
□ 9 3925	200 C C C C C C C C C C C C C C C C C C		BPAC.S.A	alendaria hijawa se	-3			
Lead? Offense# S PennDOT Data	ection Subsection	etion P	A Statute (Title)	Counts  Safety Z	Grade	NCIC Offense Code UCR/NIBRS Code  Work Zone		
(if applicable) Statute Description (in	Number ————————————————————————————————————	f statute or ordin	ance): Rece					
knowing that it has been	en stolen, or belie veillance cameras card and receivin	ving that it has p s at multiple loca a US Currency o	orobably been ntions commi or gift cards.	n stolen TO titing fraudule	WIT: Smi ent transa	es of movable property of another th and Co-defendant Starks were actions with a Pennsylvania State		

Page \_\_\_ of \_\_\_



### POLICE CRIMINAL COMPLAINT

				<b>沙野</b>		CRIMINAL COMPLAINT		
Docket Number:	Date Filed:	OTN/LiveScan No	ımber			plaint/Incident Number 3000217		
	//	1	Middle:		Last:	3000/217		
Defendant Name	First: Shakour	1	Shalik		Smith	•		
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there is more than one (Set forth a brief summary o	offense, each of the facts sufficient summary case, you not the offense may be	ffense should be n to advise the defendar nust cite the specific s se included if known, h	numbered ch nt of the nature ection(s) and si n addition, socia	ronologica of the offens ubsection(s) al security n	ally. se(s) charged. of the statute umbers and fi de §§ 213.1 – 2			
Inchoate ☐ Attempt Offense 18 901 A		Solicitati 18 902 A	ion			Conspiracy 18 903		
□ 10 7512		of the 18	PA C.S.A	4	F-3			
	ection Subse		A Statute (Title)	Counts	Grade	NCIC Offense Code UCR/NIBRS Code		
PennDOT Data	Accident Number			☐ Safety	/ Zone	☐ Work Zone		
Statute Description (inc	clude the name	of statute or ordina	nce): Crimi	nal Use o	f Commu	nication 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	(U3/24/17 (priorie o	111).						
Inchoate		☐ Solicitat	ion			Conspiracy		
Offense 18 901 A		18 902 A				18 903		
□ 11 4105	A(1)		PA C.S.A	1 Counts	M-1 Grade	NCIC Offense Code UCR/NIBRS Code		
Lead? Offense# S PennDOT Data (if applicable)	ection Subsection Subs	ection PA	Statute (This)	☐ Safety		☐ Work Zone		
Statute Description (in-		of statute or ordina	ance): Bad C	Checks —	l Count			
the payment of money	, knowing that it posit of a check	will not be honore to be made knowi	d by the draving that the c	wee TO W heck woul	'IT: Defenda	es a check or similar sight order for ant Smith mobile deposited a check ed due to non-sufficient funds.		
Inchoate ☐ Attempt		│	ion			Conspiracy		
Inchoate ☐ Attempt Offense 18 901 A		18 902 A				18 903		
☐ [12] [3922]	0.000.000.000.0000000000000000000000000		PA C.S.A Statute (Title)	1 Counts	F-3	NCIC Offense Code UCR/NIBRS Code		
PennDOT Data	Accident	ection	Totaldio (11.5)	☐ Safety		☐ Work Zone		
(if applicable) Statute Description (in	Number —— clude the name	of statute or ordina	ance): Conspir	acy (Theft by	Deception)			
another person(s) to	commit a crime	, to wit, Theft by eding \$2000 by cre	Deception, eating or rein	in that the forcing a f	<ul> <li>Defendar</li> <li>alse impres</li> </ul>	ultiple occasions did conspire with at intentionally obtained or withheld ssion, including false impressions as and/or (3).		

Docket Number:					Complaint/ BNG0002	plaint/Incident Number					
Defendant Name	First: Shakour		Middle: <b>Shalik</b>	1	BNG0002  st: <b>mith</b>	(1 <i>(</i>					
I ask that a warran made.		summons be issu	ed and that the d	lefendant be	required to a	nswer the charg	es I have				
I verify that the factory     This verification is unsworn falsification	made subject to	the penalties of	rue and correct t Section 4904 of t	o the best of the Crimes C	my knowledg ode (18 Pa.C	e or information .S. § 4904) rela	and belief. Iting to				
4. This complaint cor	nsists of the pre	ceding page(s) nu	umbered 1 thro	$\frac{1}{2}$							
The acts committed to f Pennsylvania and (Before a warrant of issuing authority, a	were contrary to f arrest can be	the Act(s) of the	Assembly, or in	violation of th	ie statutes cit	ed.					
		(Date)z		_	(Sig	mature of Affiant)					
AND NOW, on this date	30	May 26 i	7 I certify that	the complaint h	nas been prope	erly completed an	d verified.				
An affidavit of probable	cause must be co	ompleted before a v	varrant can be issu	.beı							
34- (Magisterial District Cod	1 - 0 6 urt Number)	(lss	Lind Authority)	u u –		SEAL	-				



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

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

1519 - "bankrollkiloooo" - What card

1520 - CLARKE - My new PSECU card

1528 - "bankrollkiloooo" -Yes

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

1529 - "bankrollkiloooo" - \$6200 cleared today

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

1532- CLARKE - I want sum

1532 - bankrollkiloooo - 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 ganes
- 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 hewanted 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 39<sup>th</sup> 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 16<sup>th</sup> 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 INTHAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE-AND OF MY KNOWLEDGE, INFORMATION AND BELIEF.  (Sign	AW, DEPOSE CORRECT TO S33, Move S46 ature of Affiant)	THE BEST
Sworn to me and subscribed before me 30 day of May 5/30/17 Date May	erial District Ju	<b>.022</b> dge
My commission expires first Monday of January, 2622	SEAL	



## 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: SHAKOUR	Middle: SHALIK	Last: SMITI			
Complaint/Incident Nui BNG000217				Co-Defendan <u>t # 1</u>		
IKEEM MAURICE S	STARKS					
(Name)		•				
5120 KNOX STREI	ET					
(Home Street Address)						
PHILADELPHIA, P.	A 19144					
(City, State, & ZIP Code	)	(Telephone #)	•			
Complaint/Incident Nu BNG000217		·		Co-Defendan <u>t # 2</u>		
QUADIR JAMES B	URLEY					
(Name)		•				
1524 W. LEHIGH	AVENUE	11				
(Home Street Address)		•				
PHILADELPHIA, P	A 19132					
(City, State, & ZIP Code	)	(Telephone #)				
Complaint/Incident Nu				Co-Defendant#		
(Name)	·					
(Home Street Address)						
(City, State, & ZIP Code	<del>)</del>	(Telephone #)	)			
Complaint/Incident Nu	imber			Co-Defendant #		
(Name)						
(Home Street Address)			,,			
(City, State, & ZIP Code	e)	(Telephone #	)			

# COMMONWEALTH OF PENNSYLVANIA

COUNTY OF: Montgomery



# POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.

Magisterial Dist	ict Numb	er: 3	8-1-06			n -	H							
MDJ: Hon. Her	ry Schire	eson				DEFENDANT: (NAME and ADDRESS):								
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Narb	eth, PA 1	9072				First Name	-yra isa katiya		Name	(47-36) (48-36) (50)	-Last Nai	ne	F - 130.79	Gen.
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(The attorney for t filing. See Pa.R.C			ilth may i	require	that the o	complaint, arrest v	varrant affidavit,	or both b	e approv	ed by th	ne attorney	for the	Commonwe	alth prior to
ning. See Fa.K.C	4 IIII.F. 50	<i>. j.</i>						, ,						
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## POLICE CRIMINAL COMPLAINT

			I OLIOL OTAINITOTE OOM LOTT				
Docket Number:	t Number: Date Filed: OTN/LiveScan Number		Complaint/Incident Number				
	/ /		BNG000217				
	First:	Middle:	Last:				
Defendant Name	Quadir	James	Burley				

- 2. 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.
- 3. 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.

unsworn falsification to authorities.		
4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{5}$ .		
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes ci (Before a warrant of arrest can be issued, an affidavit of probable cause must be complete issuing authority, and attached.)	ted.	
(Date)	nature of Affiant)	
AND NOW, on this date 5-30-17 I certify that the complaint has been proportion	erly completed and	d verified.
An affidavit of probable cause must be completed before a warrant can be issued.		
38-1-06		
(Magisterial District Court Number) (Issuing Authority)	SEAL	



### POLICE CRIMINAL COMPLAINT

			******		CRIMINAL COMPLAINT				
Docket Number:	Date Filed: / /	OTN/LiveScan Nu		BN	iplaint/Incident Number G000217				
Defendant Name	First:	} -	Middle:	Last:					
	Quadir		James	Burle	e <b>y</b>				
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 <i>brief</i> 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 ☐ Attempt Offense 18 901 A		Solicitation 18 902 A	on.		Conspiracy 18 903				
□ 5111	A(1)		Pa C.S.A 8 A Statute (Title) C	F-1	NCIC Offense Code UCR/NIBRS Code				
PennDOT Data (if applicable)	Accident Subse Number			Safety Zone	☐ Work Zone				
Statute Description (inc	clude the name o	f statute or ordina	nce): Dealing in	proceeds of u	ınlawful activities – 1 count				
obtained property, represent activity TO WIT: Burley did d	s the proceeds of un Irive and meet with a ses Credit Union (PS the amount of money Jackson that caused	lawful activity, the pers Pennsylvania Office of ECU) Visa debit card, t that was generated fro I a loss of approximate	on acts with the intent Attorney General Na hat the defendant rela om the fraudulent tran y \$4,000.00 to PSEC	t to promote the ca rcotics Agent actin ated that he was go sactions. Defendal	ty involved , including stolen or illegally irrying on of the unlawful of the unlawful ig in an undercover capacity to receive a ping to use in fraudulent transactions. Burley nt Burley did cause eight fraudulent				
Inchoate		☐ Solicitation	on :		Conspiracy 18 903				
□ 2 4101	A(3)		På C.S.A 1	F-2					
PennDOT Data	Accident	ction PA	Statute (Title) Cour	its Grade Safety Zone	NCIC Offense Code UCR/NIBRS Code  Work Zone				
(if applicable) Statute Description (inc	Number   clude the name of	of statute or ordina	nce): 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)									
Inchoate ☐ Attempt		☐ Solicitati	on		Conspiracy				
Offense 18 901 A		18 902 A			18 903				
☐ 3 4106 Lead? Offense# S	A(1)		Pa C.S.A 8 Statute (Title) Cour	F-3	NCIC Offense Code UCR/NIBRS Code				
PennDOT Data (if applicable)	Accident : Number:			Safety Zone	☐ Work Zone				
Statute Description (in	clude the name o	of statute or ordina	nce): Conspiracy	to Commit A	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)							



•			The state of the s		CRIMINAL COMPLAINT
Docket Number:	Date Filed: / /	OTN/LiveScan Numb	er `	W000 SN 2020000	plaint/Incident Number 3000217
	First:	Mide	ile:	Last:	***************************************
Defendant Name	Quadir	Jan	nes	Burle	y
there is more than one (Set forth a <i>brief</i> summary of more, is not sufficient. In a s	offense, each of the facts sufficient tummary case, you n of the offense may b	ffense should be numl to advise the defendant of must cite the specific section included if known. In additablished, list only the last	pered chronologions  the nature of the offents  n(s) and subsection(s)  ition, social security	cally. nse(s) charged. s) of the statute numbers and fi ode §§ 213.1 – 2	Conspiracy
Offense 18 901 A		18 902 A			18 903
☐ 4 4120 Lead? Offense# Se	A Subse	of the 18 Pa	C.S. A 8	F-3	NCIC Offense Code UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		☐ Safe	ety Zone	☐ Work Zone
Statute Description (inc	clude the name o	of statute or ordinance	):Conspiracy to	commit Ide	ntity Theft- 8 counts
one or more of them would engage to commit such crime, Possess or uses, through any mea	in conduct which constitutions, identifying information ount and made statemen raudulent transactions to ania State Employee Creating State State Employee Creating State Stat	utes a crime or did agree to aid su on of another person without the co tts vocalizing his intentions to com occur on the Nefeese Jackson Pe dit Union)	ich other person or person onsent of that other person mit fraud with the Nefeese	is the planning or co in to further any unla selackson Pennsylv	lid agree with one or more other persons that they or ommission of such crime or of an attempt or solicitation wful purpose TO WIT: Burley did recruit Nefeese ania State Employees Credit Union Visa debit card. nk account. These fraudulent transactions were not
Inchoate ☐ Attempt Offense 18 901 A		☐ Solicitation 18 902 A			Conspiracy 18 903
☐ 5 3922 Lead? Offense# Se	1 Subse	of the 18 PA	18.2008 (18.00 No. 20.00 No. 2	F-3 Grade	NCIC Offense Code UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		☐ Safet	ty Zone	☐ Work Zone
Statute Description (inc	olude the name o	of statute or ordinance	): Conspiracy to	Commit Th	neft by Deception- 8 counts
intention or other state of	mind TO WIT: with crime or did agree to aid su- to be deposited a check that Union bank account causing	the intent of promoting or facilitating the other person or persons the planning the knew would be returned due to not a loss of approximately \$4,000.00.	the commission of a crime,	did agree with one or me or of an attempt o	false impressions as to law, value, r more other persons that they or one or more of them would r solicitation to commit such crime, fraudulent transactions to occur on the Nefeese Jackson
Inchoate		Solicitation 18 902 A			Conspiracy 18 903
□ 6 7512	S. be	of the 3 18 PA	ACC 100 000 000 000 000 000 000 000 000 0	F-3	NCIC Offense Code UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Subse		☐ Safet		☐ Work Zone
Statute Description (inc	clude the name o	of statute or ordinance	): Criminal Use	of Commun	ication Facility – 4 Counts
there of any crime which con messages through Instagran Contact with NA Haigler or Jackson PSECU bank acco	nstitutes a felony TO n and remotely depo n 03/21/17(phone ca ount) and 03/24/17 (	WIT: Defendant Burley did osit a check for the use of fra alls, text messages and In (phone call).	use a phone to commudulent transactions. stagram messages)	nunicate through .03/22/17 (mobile	facilitate the commission or the attempt in phone calls, text messages, direct ille deposit of check into Nefeese



## POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	116.33	Complaint/Incident Number BNG000217			
Defendant Name	First:	Middle:	La				
	Quadir	James	<u>  B1</u>	urley			
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 off	ense should be numbere	ed 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 ☐ Attempt Offense 18 901 A		Solicitation 18 902 A	33	Conspiracy 18 903			
□ 7 4105	A(1)	of the 18 PA C.S	.A 1 F-3	8			
Lead? Offense# Se	ection Subsec	tion PA Statute (	Title) Counts Gr	rade NCIC Offense Code UCR/NIBRS Code			
PennDOT Data (if applicable)	Accident Number		Safety Zone	☐ Work Zone			
Statute Description (inc	clude the name of	statute or ordinance): B	ad Checks – 1 Cou	nt			
Acts of the accused as	sociated with this	Offense: Commits an offe	nse if he issues or pass	es a check or similar sight order for the			
payment of money, know	ing that it will not be	e honored by the drawee TO ng that the check would be	O WIT: Defendant Burley	y mobile deposited a check or caused a			
•				·			
1 Count - Check deposi	ited into Nefeese J	ackson PSECU bank acco	ount on 03/22/17	·			
Inchoate		Solicitation		☑ Conspiracy			
Offense 18 901 A		18 902 A		18 903			
□ 8 3922 Lead? Offense# So	A (1) (2)			NCIC Offense Code UCR/NIBRS Code			
PennDOT Data (if applicable)	Accident Number		☐ Safety Zone	☐ Work Zone			
	HENNY AND DESCRIPTION OF THE CHARLES	f statute or ordinance): Co	onspiracy (Theft by Deception	)			
A star of the sea		d with this Offense: In t	hat the Defendant or	n multiple occasions did conspire with			
another person(s) to	commit a crime,	to wit, Theft by Decepti	on, in that the Defer	idant intentionally obtained or withheld			
property of another wit	h a value exceedi	ing \$2000 by creating or	reinforcing a false im	pression, 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).							
		·					
Inchoate		☐ Solicitation		☐ Conspiracy			
Offense 18 901 A		18 902 A		18 903			
Lead? Offense# So	ection Subsec	tion PA Statute (Ti	itle) Counts Grade	NCIC Offense Code UCR/NIBRS Code			
PennDOT Data	Accident		☐ Safety Zone	☐ Work Zone			
Statute Description (include the name of statute or ordinance):							
Acts of the accused associated with this Offense:							
		•					



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

-Igotta 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 "bankrollkiloooo":

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

1519 - "bankrollkiloooo" - What card

1520 - CLARKE - My new PSECU card

1528 - "bankrollkiloooo" -Yes

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

1529 - "bankrollkiloooo" - \$6200 cleared today

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

1532- CLARKE - I want sum

1532 – bankrollkiloooo – 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 ganes
- 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 hewanted 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 39<sup>th</sup> 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 lkeem 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 16<sup>th</sup> 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 ACC	ORDING TO THE LAW	/, DEPOSE AND SAY
THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT		
OF MY KNOWLEDGE, INFORMATION AND BELIEF.	Short My	k \$33
	gabriel [1	non 542
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	(Signatur	e of Affiant)
Sworn to me and subscribed before me day of	Muy	2017
5-30-17 Date // June elecer-	, Magisteria	District Judge
	•	
My commission expires first Monday of January, 2022		
		SEAL





## **Co-Defendant Data Sheet**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BNG000217
Defendant Name	First: QUADIR	Middle: JAMES	Last: BURLEY
Gomplaint/Incident Num			Co-Defendan <u>t # 1</u>
SHAKOUR SMITH			
(Name)			·
5450 WISSAHICKO	N AVENUE		
(Home Street Address)		•	
PHILADELPHIA, PA (City, State, & ZIP Code)	19144	(Telephone #)	
(019, 01410, 4211 0040)		(Telephone #)	
Complaint/Incident Num	第16年的最初の自由第三人の第三人の		Co-Defendan <u>t # 2</u>
BNG000217			Co-Deteridar <u>it # 2.</u>
IKEEM STARKS (Name)			·
5126 KNOXX STRE	ET		
(Home Street Address)	<u> </u>	· .	
PHILADELPHIA, PA	19144		
(City, State, & ZIP Code)		(Telephone #)	
Complaint/Incident Num	ber		Co-Defendant #
(Name)		,	
(Home Street Address)			,
			•
(City, State, & ZIP Code)		(Telephone #)	
Complaint/Incident Num	7-2-7-000 0000000		·
Companioncident Num	uei	•	Co-Defendant #
(Name)			-
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