

INTRODUCTION

We, the members of the Forty-first Statewide Investigating Grand Jury, having received evidence pertaining to violations of the Pennsylvania Crimes Code which occurred in Bucks County, Pennsylvania and elsewhere, pursuant to Notice of Submission of Investigation No. 23, do hereby make the following findings of fact and recommendation of charges:

FINDINGS OF FACT

OVERVIEW

Over the course of the past several months, this Grand Jury has conducted an investigation into a large-scale organization operating in southeastern Pennsylvania that has generated hundreds of thousands of dollars in annual revenue through the purchase and subsequent re-sale of stolen new-in-box merchandise between January, 2014 and October, 2017. To date, the investigation has revealed that the organization as a whole is comprised of five separate store front locations in Bucks, Philadelphia and Delaware counties which operate nominally as pawn shops. This Grand Jury has discovered that a large percentage of the income of the owners of these establishments did not come from the purchase of used goods, nor the pawning of personal property; rather, the income was generated by the systematic purchase of new merchandise that was stolen by professional retail thieves who are opioid-dependent. These thieves are known as "boosters." The investigation revealed that virtually every booster engaged in an almost daily routine of thefts from various chain stores throughout southeastern Pennsylvania and New Jersey in order to ultimately obtain money to purchase heroin or opioids such as Percocet or Oxycodone pills. The investigation revealed that the owners and employees of the five pawn shops routinely purchased items from the boosters and would pay those individuals approximately 30% to 40% of the stolen property's retail value. The owners and employees would then transport the stolen property to a central

warehouse location. Thereafter, they would list the stolen goods on eBay and sell the property for actual retail value, or slightly below the actual retail value.

While the investigation into the principal owners and employees of the entire organization is ongoing, this Presentment will focus on the criminal conduct committed at the following two pawn shops in Bucks County: 1.) Levittown Quick Cash Trading Post located at 4534-36 New Falls Road, Levittown, Bristol Township; and 2) Morrisville Loan & Pawn located at 411 Trenton Avenue, Morrisville, Falls Township. Michael Stein ("Stein") is the principal owner of both pawn shops¹ and he employed, at various times relevant to this investigation, four separate employees at the two shops: Victor Kline ("Kline"), Brian Jancia ("Jancia"), Joshua Fedalen ("Fedalen") and Lyle Boden ("Boden"). These four individuals along with Stein were responsible for directly dealing with the boosters to purchase the stolen merchandise.

BACKGROUND

This investigation began after loss prevention agents employed at several of the major national chain stores including Walmart, Target, Home Depot, CVS and Giant Foods, observed a significant increase in the number of thefts from their stores located throughout southeastern Pennsylvania and New Jersey.² These loss prevention agents were able to track some of the suspected boosters of their products to various pawn shops, including Levittown Quick Cash

¹ There are two minority owners of both pawn shops who each own 25% of the businesses. Those two individuals are also the primary owners of two other pawn stores located in Delaware County. Additionally, they are the minority owners of a store in Philadelphia County and a store in Montgomery County. The Grand Jury continues to investigate the conduct of these two individuals.

² This Grand Jury heard testimony that this increase in systematic thefts from large retailers is not limited to southeastern Pennsylvania; rather, it is part of a national trend that has been linked to the current opioid crisis facing the country.

Trading Post and Morrisville Loan & Pawn. The loss prevention agents initially brought their concerns to Falls Township Police Department.

Sergeant Chris Clark ("Sergeant Clark") of the Falls Township Police Department testified before the Grand Jury and explained that he initiated his investigation in April, 2015. Shortly thereafter, he began utilizing a confidential informant ("CI") to sell purportedly stolen goods at both pawn shops. Thereafter, the Bucks County District Attorney's Office and the Bucks County Detectives began to assist in this investigation. Sergeant Clark soon discovered that both stores operated on what can essentially be termed a "don't ask, don't tell" basis. As long as the thief did not specifically state that the items were stolen, the items were purchased with no questions asked. Pawn shop owners and employees turned a blind eye to the fact that many of these items were in their original packaging and often had the store labels still attached. They also continued to purchase merchandise from boosters who had previously admitted to them that they were committing retail thefts. The employees would check the prices for what the items were selling for on eBay and then offer the CI approximately 30% of their online value. Sergeant Clark's investigation revealed that employees of the store would frequently suggest that the boosters return the item to the store from which it was obtained and exchange it for a gift card. The employees explained to the boosters that they could pay more for a gift card than they could for the actual product. The Grand Jury learned that the average amount paid for a gift card was approximately 50% of its face value.

As the investigation continued, Sergeant Clark began a review of the stores' purchase records which had been documented through "LeadsOnline," an on-line service. He explained that LeadsOnline is a private database which both Falls Township and Bristol Township require pawn shops to utilize. This Grand Jury heard testimony that both stores are required by municipal

ordinance to obtain driver's license information from every individual from whom they make purchases. The stores are also required to provide a description of the item purchased and the amount paid for that item. Consequently, all of the records described below came directly from the submissions of the owners and employees of both stores.

As the investigation grew, Sergeant Clark and other investigators realized that this was a multi-county operation involving potentially at least four other stores - one located in Philadelphia, two in Delaware County and one additional store located in Montgomery County. Investigators then elicited the assistance of the Delaware County District Attorney's Office and their county detectives. Eventually, due to the multi-county nature and complexity of the investigation, the investigators contacted the Pennsylvania Attorney General in late 2016 to coordinate the investigation moving forward.

BOOSTERS

Over the past year, investigators were able to identify over 27 recidivist boosters who systematically stole hundreds of thousands of dollars of new merchandise from the above-listed chain stores, as well as other retail establishments, throughout Lehigh, Bucks, Montgomery, Philadelphia, Delaware counties and several counties in New Jersey. These boosters, in turn, sold the stolen items at either Levittown Quick Cash Trading Post and/or Morrisville Loan & Pawn. The investigation revealed that that while many of those individuals operated alone, others have operated as part of a "booster crew" which was sometimes headed by an individual in charge. In addition to the information provided by both stores through LeadsOnline, investigators were able to corroborate that these individuals were involved in the theft and subsequent re-sale of the merchandise through a plethora of investigative techniques including physical surveillance, review of in-store security camera footage provided by various loss prevention agents, consensual and

non-consensual intercepted communications, execution of search warrants at various locations associated with the organization including Levittown Quick Cash Trading Post and Morrisville Loan & Pawn, and interviews with many of the individuals involved in the thefts themselves.

Listed below are charts derived from the LeadsOnline submissions made by both Levittown Quick Cash Trading Post and Morrisville Loan & Pawn for 27 individuals. This Grand Jury has received sufficient evidence that each one of these individuals was involved in the theft of new-in-box merchandise and sold the stolen merchandise to one or both of the pawn shops. The estimated retail value for the merchandise is based upon 33% of the total retail value. Testimony before the Grand Jury established that this was the average amount paid to boosters when they sold their products. The 50% mark-up for the gift cards was also based on testimony received by the Grand Jury.

KIMBERLY BYE BOOSTER CREW

The Grand Jury heard testimony that one group of boosters consisted of Kimberly Bye (“Bye”), Dustin Bickel, Christopher Donnelly and Michael Lekatis. Evidence was presented that this group of thieves was led by Bye who, in addition to being a thief herself, had a personal relationship with Stein. Detailed below are the time periods during which each member of the group was active in the theft and re-sale of stolen merchandise. In total, the group was responsible for selling over \$117,000.00 worth of stolen merchandise and over \$4,000.00 in gift cards to Levittown Quick Cash Trading Post and/or Morrisville Loan & Pawn. This group primarily stole merchandise from pharmaceutical stores such as Rite-Aid, CVS and Walgreens. The stolen items of choice were generally described as new-in-box dietary supplements and cosmetics.

| <u>Booster</u> | <u>No. of Items Sold</u> | <u>Of No. of Items Sold, No. of Items with No Value</u> | <u>Time Frame And No. of Visits</u> | <u>Gift Cards</u> | <u>Retail Value of Gift Cards</u> | <u>Merchandise</u> | <u>Retail Value of Merchandise</u> | <u>Total Amount Paid</u> | <u>Total Retail Value</u> |
|----------------------|--------------------------|---|-------------------------------------|-------------------|-----------------------------------|--------------------|------------------------------------|--------------------------|---------------------------|
| Kimberly Bye | 876 | 178 | 3/4/14 to 10/12/17 (876) | \$823.72 | \$1,647.44 | \$24,784.28 | \$74,352.84 | \$25,608.00 | \$76,000.28 |
| Dustin Bickel | 164 | 14 | 11/11/14 to 3/18/17 (64) | \$50.00 | \$100.00 | \$4,231.00 | \$12,693.00 | \$4,281.00 | \$12,793.00 |
| Christopher Donnelly | 202 | 48 | 9/1/15 to 9/24/17 (102) | \$1,236.00 | \$2,472.00 | \$5,591.00 | \$17,973.00 | \$6,827.00 | \$20,445.00 |
| Michael Lekatis | 181 | 21 | 1/18/14 to 9/17/17 (81) | \$62.00 | \$124.00 | \$4,035.00 | \$12,105.00 | \$4,097.00 | \$12,229.00 |
| Sub-Total | 1,423 | 261 | (1,123) | \$2,171.72 | \$4,343.44 | \$38,641.28 | \$117,123.84 | \$40,813.00 | \$121,467.28 |

RENEE LARKIN BOOSTER CREW

The Grand Jury heard testimony that one group of boosters consisted of Renee Larkin ("Larkin"), Beatrice Flippen, Gerald Opdyke, Robert Dosil, Jr. and Benjamin Legg. Evidence was presented that this group of thieves was led by Larkin. Detailed below are the time periods during which each member of the group was active in the theft and re-sale of stolen merchandise. In total, the group was responsible for selling over \$185,000.00 worth of stolen merchandise and over \$500.00 in gift cards to Levittown Quick Cash Trading Post and/or Morrisville Loan & Pawn. This group primarily stole from pharmaceutical stores such as Rite-Aid and CVS, as well as various retail establishments such as Target and Kohl's. The stolen items of choice were generally described as new-in-box electric toothbrushes, waterpiks, graphing calculators and steam inhalers.

| <u>Booster</u> | <u>No. of Items Sold</u> | <u>Of No. of Items Sold, No. of Items with No Value</u> | <u>Time Frame And No. of Visits</u> | <u>Gift Cards</u> | <u>Retail Value of Gift Cards</u> | <u>Merchandise</u> | <u>Retail Value of Merchandise</u> | <u>Total Amount Paid</u> | <u>Total Retail Value</u> |
|------------------|--------------------------|---|-------------------------------------|-------------------|-----------------------------------|--------------------|------------------------------------|--------------------------|---------------------------|
| Renee Larkin | 306 | 13 | 7/5/14 to 9/29/17 (306) | \$274.50 | \$549.00 | \$32,735.50 | \$98,206.50 | \$33,010.00 | \$98,755.50 |
| Beatrice Flippen | 550 | 75 | 2/15/17 to 8/22/17 (106) | \$0.00 | \$0.00 | \$16,260.00 | \$48,780.00 | \$16,260.00 | \$48,780.00 |
| Gerald Opdyke | 34 | 5 | 8/6/17 to 8/26/17 (34) | \$0.00 | \$0.00 | \$1,515.00 | \$4,545.00 | \$1,515.00 | \$4,545.00 |
| Robert Dosil Jr. | 85 | 0 | 3/1/14 to 10/18/17 (85) | \$0.00 | \$0.00 | \$9,040.00 | \$27,120.00 | \$9,040.00 | \$27,120.00 |
| Benjamin Legg | 47 | 0 | 4/18/17 to 9/21/17 (47) | \$0.00 | \$0.00 | \$2,405.00 | \$7,215.00 | \$2,405.00 | \$7,215.00 |
| Sub-Total | 1,022 | 93 | (578) | \$274.50 | \$549.00 | \$61,955.50 | \$185,866.50 | \$62,230.00 | \$186,415.50 |

DAHM, McKENNA, GALUCCI BOOSTER CREW

The Grand Jury heard testimony that one group of boosters consisted of James McKenna, Jr., Emma Dahm, and Joseph Galucci. Detailed below are the time periods during which each member of the group was active in the theft and re-sale of stolen merchandise. In total, the group was responsible for selling over \$25,000.00 worth of stolen merchandise and over \$300.00 in gift cards to Levittown Quick Cash Trading Post and/or Morrisville Loan & Pawn. The group was primarily involved in stealing merchandise from Kohl's, Walmart and Target. The stolen items of choice were generally described as new-in-box Ninja blenders, Nest thermostats, Ring doorbells and external hard drives.

| <u>Booster</u> | <u>No. of Items Sold</u> | <u>Of No. of Items Sold, No. of Items with No Value</u> | <u>Time Frame And No. of Visits</u> | <u>Gift Cards</u> | <u>Retail Value of Gift Cards</u> | <u>Merchandise</u> | <u>Retail Value of Merchandise</u> | <u>Total Amount Paid</u> | <u>Total Retail Value</u> |
|-------------------|--------------------------|---|-------------------------------------|-------------------|-----------------------------------|--------------------|------------------------------------|--------------------------|---------------------------|
| Emma Dahm | 43 | 2 | 1/27/17 to 9/7/17 (43) | \$0.00 | \$0.00 | \$2,355.00 | \$7,065.00 | \$2,355.00 | \$7,065.00 |
| James McKenna Jr. | 86 | 27 | 9/23/14 to 10/12/17 (86) | \$50.00 | \$100.00 | \$4,155.00 | \$12,465.00 | \$4,205.00 | \$12,725.00 |
| Joseph Galucci | 33 | 0 | 2/14/17 to 9/12/17 (33) | \$116.00 | \$232.00 | \$1,840.00 | \$5,520.00 | \$1,956.00 | \$5,752.00 |
| Sub-Total | 163 | 29 | (162) | \$166.00 | \$332.00 | \$8,350.00 | \$25,050.00 | \$8,516.00 | \$25,382.00 |

DUBUQUE, SHALIS BOOSTER CREW

This Grand Jury heard testimony that Cynthia Dubuque (“Dubuque”) and Michael Shalis (“Shalis”) operated together in the theft and subsequent re-sale of stolen merchandise. Evidence was presented that while Dubuque was responsible for selling the stolen merchandise, Shalis was involved with Dubuque in the thefts of that merchandise. The two were responsible for selling over \$9,000.00 worth of stolen merchandise and over \$7,500.00 in gift cards to Levittown Quick Cash Trading Post and/or Morrisville Loan & Pawn. The two were primarily involved in stealing from Home Depot. The stolen items of choice were generally described as new-in-box kitchen faucets.

| <u>Booster</u> | <u>No. of Items Sold</u> | <u>Of No. of Items Sold, No. of Items with No Value</u> | <u>Time Frame And No. of Visits</u> | <u>Gift Cards</u> | <u>Retail Value of Gift Cards</u> | <u>Merchandise</u> | <u>Retail Value of Merchandise</u> | <u>Total Amount Paid</u> | <u>Total Retail Value</u> |
|------------------|--------------------------|---|-------------------------------------|-------------------|-----------------------------------|--------------------|------------------------------------|--------------------------|---------------------------|
| Cynthia Dubuque | 93 | 0 | 7/21/15 to 11/15/15 (93) | \$3,806.00 | \$7,612.00 | \$3,157.00 | \$9,471.00 | \$6,963.00 | \$17,083.00 |
| Michael Shalis | 0 | 0 | N/A | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Sub-Total | 93 | 0 | (93) | \$3,806.00 | \$7,612.00 | \$3,157.00 | \$9,471.00 | \$6,963.00 | \$17,083.00 |

GIANNINI, MULLIGAN, YOUSTOS, SASSAMAN BOOSTER CREW

This Grand Jury heard testimony that Dylan Giannini, Kenneth Mulligan, Michael Youstos and Phillip Sassaman operated together in the theft and subsequent re-sale of stolen merchandise. This group was responsible for selling over \$48,000.00 worth of stolen merchandise and \$200.00 in gift cards to Levittown Quick Cash Trading Post and/or Morrisville Loan & Pawn. The group was involved in stealing primarily from area malls and Lowe's. The stolen items of choice were generally described as new-in-box saws, Kitchen Aide blenders, Dyson vacuums and tools.

| <u>Booster</u> | <u>No. of Items Sold</u> | <u>Of No. of Items Sold, No. of Items with No Value</u> | <u>Time Frame And No. of Visits</u> | <u>Gift Cards</u> | <u>Retail Value of Gift Cards</u> | <u>Merchandise</u> | <u>Retail Value of Merchandise</u> | <u>Total Amount Paid</u> | <u>Total Retail Value</u> |
|------------------|--------------------------|---|-------------------------------------|-------------------|-----------------------------------|--------------------|------------------------------------|--------------------------|---------------------------|
| Dylan Giannini | 108 | 14 | 10/15/16 to 9/27/17 (108) | \$0.00 | \$0.00 | \$9,913.20 | \$29,739.60 | \$9,913.20 | \$29,739.60 |
| Kenneth Mulligan | 4 | 0 | 8/28/16 to 9/13/17 (4) | \$0.00 | \$0.00 | \$310.00 | \$930.00 | \$310.00 | \$930.00 |
| Michael Youstos | 6 | 0 | 6/5/17 to 9/11/17 (6) | \$0.00 | \$0.00 | \$535.00 | \$1,605.00 | \$535.00 | \$1,605.00 |
| Phillip Sassaman | 46 | 1 | 10/28/15 to 7/23/17 (46) | \$100.00 | \$200.00 | \$5,290.00 | \$15,870.00 | \$5,390.00 | \$16,070.00 |
| Sub-Total | 164 | 15 | (164) | \$100.00 | \$200.00 | \$16,048.20 | \$48,144.60 | \$16,148.20 | \$48,344.60 |

INDIVIDUAL BOOSTERS

The following boosters were identified through testimony before the Grand Jury: Robert Masterson, Jason Masterson, Patricia Nazian, William Haney, Manuel Sierra, Jacob Day and Annamarie Day, Daniel McKenna and Matthew Gleason. Their sales of stolen merchandise to Levittown Quick Cash Trading Post and/or Morrisville Loan & Pawn are detailed below.

| <u>Booster</u> | <u>No. of Items Sold</u> | <u>Of No. of Items Sold, No. of Items with No Value</u> | <u>Time Frame And No. of Visits</u> | <u>Gift Cards</u> | <u>Retail Value of Gift Cards</u> | <u>Merchandise</u> | <u>Retail Value of Merchandise</u> | <u>Total Amount Paid</u> | <u>Total Retail Value</u> |
|------------------|--------------------------|---|-------------------------------------|-------------------|-----------------------------------|---------------------|------------------------------------|--------------------------|---------------------------|
| Robert Masterson | 566 | 121 | 9/9/14 to 3/30/17 (565) | \$689.00 | \$1,378.00 | \$26,738.00 | \$80,214.00 | \$27,427.00 | \$81,592.00 |
| Jason Masterson | 87 | 15 | 10/8/14 to 10/30/17 (84) | \$147.00 | \$294.00 | \$5,803.00 | \$17,409.00 | \$5,950.00 | \$17,703.00 |
| Patricia Nazian | 133 | 7 | 3/28/14 to 11/6/17 (130) | \$461.00 | \$922.00 | \$5,123.00 | \$15,369.00 | \$5,584.00 | \$16,291.00 |
| William Haney | 307 | 15 | 3/11/15 to 10/10/17 (232) | \$16,387.00 | \$32,772.00 | \$2,891.00 | \$8,673.00 | \$19,278.00 | \$41,445.00 |
| Manuel Sierra | 133 | 0 | 3/20/17 to 10/4/17 (133) | \$0.00 | \$0.00 | \$7,470.00 | \$22,410.00 | \$7,470.00 | \$22,410.00 |
| Jacob Day | 197 | 56 | 1/26/14 to 4/11/17 (195) | \$92.00 | \$184.00 | \$8,475.00 | \$25,425.00 | \$8,567.00 | \$25,609.00 |
| Annamarie Day | 162 | 36 | 2/10/15 to 4/20/17 (162) | \$65.00 | \$130.00 | \$15,335.00 | \$46,005.00 | \$15,400.00 | \$46,135.00 |
| Daniel McKenna | 321 | 30 | 6/27/15 to 3/2/17 (321) | \$0.00 | \$0.00 | \$16,722.00 | \$50,166.00 | \$16,722.00 | \$50,166.00 |
| Matthew Gleason | 124 | 4 | 5/29/14 to 10/11/17 (112) | \$2,717.00 | \$5,434.00 | \$12,751.00 | \$38,253.00 | \$15,468.00 | \$43,997.00 |
| Sub-Total | 2,030 | 284 | (1,914) | \$20,558 | \$41,114.00 | \$101,308.00 | \$303,924.00 | \$121,866.00 | \$345,348.00 |

The totals for all 27 identified boosters established that they sold nearly 5,000 stolen items to the two stores between 2014 and 2017 and were paid a total of \$229,459.98 for those items.

During that same time period, the boosters sold over \$50,000.00 worth of gift cards which they had obtained by returning stolen merchandise to the stores for store credit.

| | <u>No. of Items Sold</u> | <u>Of No. of Items Sold, No. of Items with No Value</u> | <u>Time Frame And No. of visits</u> | <u>Gift Cards</u> | <u>Retail Value of Gift Cards</u> | <u>Merchandise</u> | <u>Retail Value of Merchandise</u> | <u>Total Amount Paid</u> | <u>Total Retail Value</u> |
|--------------|--------------------------|---|-------------------------------------|-------------------|-----------------------------------|--------------------|------------------------------------|--------------------------|---------------------------|
| TOTAL | 4,884 | 682 | 1/18/14 to 10/12/17 (4,034) | \$27,076.22 | \$54,150.44 | \$229,459.98 | \$689,579.94 | \$256,536.20 | \$743,730.38 |

OWNER/EMPLOYEES

As principal owner of both Levittown Quick Cash Trading Post and the Morrisville Loan & Pawn stores, Stein owned 50 % of each store. From January, 2014 through October 2017, Stein, along with his employees Fedalen, Kline, Jancia and Boden, purchased nearly \$700,000.00 worth of stolen new-in-box merchandise from the boosters. All five individuals operated under the “don’t ask, don’t tell” policy. They felt that they were shielded from any criminal liability as long as the seller did not directly and specifically inform them that the items were stolen.

The Grand Jury learned that numerous consensually recorded transactions were conducted by several CIs who were provided with purportedly stolen merchandise by law enforcement for the purpose of selling them at the two stores. A review of some of the recordings made by one of the CIs confirmed that Stein and his employees continued to buy merchandise from the CI even though the CI had indicated on previous occasions that he was stealing items from stores. The response from the individuals working at the store was that the CI should take the item back to the store and exchange it for a merchandise card, which the employee would then purchase from the CI. One employee told that same CI that he did not want to know that the CI was “robbing the old lady next door,” but if the CI could bring him twenty calculators the following week, he would

buy them. On another occasion, that same employee also advised the CI that if the CI could not go back to the store, he should get a relative or friend to return the item for a store merchandise card which the employee would then purchase.

As shown above, Stein and his four employees purchased nearly 5,000 stolen items over the course of a four year period from 27 boosters who were regular patrons of the two stores. The investigation revealed that the boosters would usually have specific items that they were comfortable in both stealing and then selling to the two stores. Stein and his employees would continue to purchase these items despite the fact that each booster was regularly selling scores of the same item, often multiple times a week. Investigating agents interviewed many of these boosters who had been selling stolen merchandise at the two stores and they confirmed that Stein, Kline, Fedalen, Jancia and Boden were the individuals who purchased their stolen items.

It is clear to this Grand Jury that all five individuals had to blatantly ignore the reality that no patron of their stores could continue to purchase new-in-box merchandise at full value and then sell that merchandise for 30% of its value, for any sustained period of time. This Grand Jury further finds that the contention that by identifying all of their purchases and sellers to law enforcement through LeadsOnline that these individuals were absolved of any criminal responsibility is not justified and not supported in fact or law.

FINANCIAL INVESTIGATION

In addition to the evidence detailed above, the Grand Jury reviewed financial records and heard testimony concerning the finances and profitability of Levittown Quick Cash Trading Post and Morrisville Loan & Pawn. The records and evidence included information from eBay, PayPal, the Pennsylvania Department of State, Citizens Bank, and various other financial institutions. The Grand Jury also heard evidence of an October 30, 2015 interview that Sergeant Clarke conducted

with one of the two minority owners (referenced in footnote one above). The owner explained in great detail the ownership structure and business practices of the stores. Additionally, the Grand Jury heard numerous intercepted wiretap conversations concerning the operation of the stores.

The Grand Jury learned that Morrisville Loan & Pawn utilized the Seller ID "secondhandauctions411" to sell their products through eBay and was associated with a PayPal account ending in 5112 held in the name of Stein. In addition to using eBay and PayPal, the store also conducted business utilizing Citizen Bank accounts ending in 7796 and 7464 which were held in the name of Morrisville Loan & Pawn Shop.

The testimony presented to the Grand Jury established that between April, 2015 and April, 2017, Morrisville Loan & Pawn sold \$1,254,664.69 worth of items through eBay. Additionally, during that same time period, Stein and/or another partner made 181 electronic withdrawals from the PayPal account utilized by Morrisville Loan & Pawn totaling \$820,106.55. The money was then electronically transferred to the Citizens Bank account ending in 7796 and was used, in part, for the continued operation of the pawn shop. The Grand Jury also learned that on or about September, 2017, Morrisville Loan & Pawn discontinued the use of the Citizen's Bank account and began using an unspecified Wells Fargo account.

The Grand Jury learned that Levittown Quick Cash Trading Post utilized the Seller ID "levittown-treasures" to sell their products through eBay. The records and testimony presented also established that Levittown Quick Cash Trading Post was associated with a PayPal account ending in 8235 held in the name of Stein. Levittown Quick Cash Trading Post also utilized Citizens Bank to conduct its business and was associated with several accounts including one account ending in 7472 held in the name of Stein / Levittown Loan & Pawnshop.

Records from eBay that were obtained and reviewed established that between April, 2015 and April, 2017, Levittown Quick Cash Trading Post sold \$2,363,912.45 worth of items through eBay. During that same time period, Stein and/or another partner made 68 electronic withdrawals from the PayPal account ending in 8235 for a total of \$1,507,200.00. The money was then electronically transferred to the Citizens Bank account ending in 7472 and was used, in part, for the continued operation of the pawn shop and as a source of periodic income for Stein and the other partners. For example, proceeds from this account were used to fund additional purchases, pay employees, make rent payments and pay utility bills. Additionally, between April, 2015 and April, 2017, Stein issued himself a weekly check in an amount ranging from \$800.00 and \$900.00. Periodic payments were also made to the other partners. As was the case with Morrisville Loan & Pawn, we learned that at or about September, 2017, Levittown Quick Cash Trading Post discontinued use of the Citizen's Bank account and began using an unspecified Wells Fargo account.

It is clear that there were numerous "new" or "new-in-box" items that were continuously listed for sale by Morrisville Loan & Pawn and Levittown Quick Cash Trading Post through August, 2017. The testimony presented to the Grand Jury showed that OAG Special Agent Joseph Daniels viewed the items offered for sale on August 31, 2017 and found that the eBay seller with ID "secondhandauctions411" had 71 items listed as "new" or "new-in-box" totaling \$6,639.07. Similarly, the eBay Seller ID "levittown-treasures" had 56 items listed as "new" or "new-in-box" totaling \$7,846.35.

Over the course of our inquiry, the Grand Jury has determined that boosters sold in excess of 4,000 items or merchandise cards to either Morrisville Loan & Pawn or Levittown Quick Cash Trading Post. The re-sale of these items alone generated a significant profit in the hundreds of

thousands of dollars and resulted in a significant loss to the retail industry in excess of a half million dollars.