

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DELAWARE



**POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.**

Magisterial District Number: 32-2-51
MDJ: Hon. CHRISTOPHER R. MATTOX
Address: 1550 GARRET RD. UPPER DARBY, PA 19082
Telephone: (610)626-6900

DEFENDANT: (NAME and ADDRESS):
KAYLA R. PARKER
First Name Middle Name Last Name Gen.
2319 S. SMITHVILLE RD. DAYTON, OHIO

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>260-18</i>	Date Filed <i>10/2/18</i>	OTN/LiveScan Number <i>U633633-0</i>	Complaint/Incident Number 56-2226	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 08/16/1992	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name Middle Name Last Name Gen.				
AKA				
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown				
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
HAIR COLOR <input type="checkbox"/> GRY (Gray) <input checked="" type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)				
EYE COLOR <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)				
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)
FBI Number	MNU Number		158	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT in.
Fingerprint Classification:				5 1

DEFENDANT VEHICLE INFORMATION

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

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

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

DAG LAUCELLA (Name of the attorney for the Commonwealth)
Michael Laucella (Signature of the attorney for the Commonwealth)
10/2/2018 (Date)

I, BRIAN KING (Name of the Affiant) #738 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
of PA OFFICE OF ATTORNEY GENERAL (Identify Department or Agency Represented and Political Subdivision) PA 0222400 (Police Agency ORI Number)
do hereby state: (check appropriate box)

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

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [111] (Subdivision Code) UPPER DARBY TOWNSHIP (Place-Political Subdivision)

in DELAWARE County [23] (County Code) on or about 2015 (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: <i>10/2/18</i>	OTN/LiveScan Number	Complaint/Incident Number 56-2226
Defendant Name	First: KAYLA	Middle: R.	Last: PARKER

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly 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.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/> 1	6312	(B)(1)	of the	18	1	F2		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): SEXUAL ABUSE OF CHILDREN								
Acts of the accused associated with this Offense: The defendant did cause or knowingly permitted a child under the age of 18 years to engage in a prohibited sexual act or in the simulation of such act be photographed, videotaped, depicted on computer or filmed; to wit the Defendant caused the victim, approximately three (3) years of age to be photographed and videotaped in violation of the Pennsylvania Crimes Code Section 6312(b), a felony of the second degree and the photographs and videos depicted this child engaged in prohibited sexual acts.								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/> 2	6312	(B)(2)	of the	18	1	F2		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): SEXUAL ABUSE OF CHILDREN								
Acts of the accused associated with this Offense: The defendant did knowingly photograph, videotape, depicted on the computer or filmed a child under the age of 18 years engaging in a prohibited sex act or in the simulation of such an act; to wit the Defendant knowingly photographed, videotaped, the victim, a female approximately three (3) years of age, in violation of the Pennsylvania Crimes Code Section 6312(b), a felony of the second degree, and the photographs and videos depicted this child engaged in prohibited sexual acts.								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/> 3	6312	(D)	of the	18	1	F2		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): SEXUAL ABUSE OF CHILDREN								
Acts of the accused associated with this Offense: The Defendant intentionally viewed and/or knowingly possessed or exercised control over any slide, photograph, film, videotape, computer depiction or other material depicting a child under the age of 18 years engaging in a 'prohibited sexual act' or in the simulation of such act, as defined in this section; to wit: Defendant used a communication facility to obtain, view, control and otherwise possess one (1) image or similar representations depicting, the victim, a female child approximately 3 years of age engaged in a prohibited sexual act and depicting indecent contact with the child, in violation of the PA CC Sec. 6312 (d), a felony of the second degree.								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 10/2/18	OTN/LiveScan Number	Complaint/Incident Number 56-2226
Defendant Name	First: KAYLA	Middle: R	Last: PARKER

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly 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.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	6320	(A)	of the	18	1	F2		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): SEXUAL EXPLOITATION OF CHILDREN

Acts of the accused associated with this Offense: The Defendant did intentionally and/or knowingly procured a child under 18 years of age for the purpose of sexual exploitation as defined in this section; to wit: The Defendant intentionally and/or knowingly procured a child under 18 years of age for the purpose of manufacturing child pornography that depicts the victim, approximately 3 year old female child, engaged in prohibited sexual act in violation of the Pennsylvania Crimes Code Section 6320 (a), felony of the second degree.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	4304	(A)(1)	of the		1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): ENDANGERING THE WELFARE OF A CHILD

Acts of the accused associated with this Offense: The Defendant was a parent, guardian or other person supervising the welfare of a child under 18 years of age, or a person that employs or supervises such a person, did knowingly and/or intentionally commit an offense endangering the welfare of a child by violating a duty of care, protection or support; to wit: The Defendant, parent of the victim, performed sexual acts on her child and provided her child for the purpose of manufacturing child pornography, on numerous occasions, establishing a course of conduct of endangering her child, in violation of the PA CC Sec. 4304 (a)(1).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	6	3126	(A)(7)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: The Defendant intentionally and/or knowingly had indecent contact with the complainant, caused the complainant to have indecent contact with the person or intentionally causes the complainant to come into contact with seminal fluid, urine or feces for the purpose of arousing sexual desire in the person or the complainant and the complainant is less than 13 years of age; to wit: The Defendant intentionally/knowingly had indecent contact with genitalia of the approximately 3 year old victim, her daughter, and the indecent assaults were a course of conduct in violation of the PA CC Sec. 3126 (a)(7), a felony of the third degree.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 10/2/18	OTN/LiveScan Number	Complaint/Incident Number 56-2226
Defendant Name	First: KAYLA	Middle: R.	Last: PARKER

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

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly 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.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	7	6312	(B)(1)	of the	18	1	F2		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): SEXUAL ABUSE OF CHILDREN

Acts of the accused associated with this Offense: The defendant did conspire with another person and cause or knowingly permitted a child under the age of 18 years to engage in a prohibited sexual act or in the simulation of such act be photographed, videotaped, depicted on computer or filmed; to wit the Defendant caused the victim, approximately three (3) years of age to be photographed and videotaped in violation of the Pennsylvania Crimes Code Section 6312(b), a felony of the second degree and the photographs and videos depicted this child engaged in prohibited sexual acts.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	8	6312	(B)(2)	of the	18	1	F2		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): SEXUAL ABUSE OF CHILDREN

Acts of the accused associated with this Offense: The defendant did conspire with another person and knowingly photograph, videotape, depicted on the computer or filmed a child under the age of 18 years engaging in a prohibited sex act or in the simulation of such an act; to wit the Defendant knowingly photographed, videotaped, the victim, a female approximately three (3) years of age, in violation of the Pennsylvania Crimes Code Section 6312(b), a felony of the second degree, and the photographs and videos depicted this child engaged in prohibited sexual acts.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	9	6312	(D)	of the	18	1	F2		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): SEXUAL ABUSE OF CHILDREN

Acts of the accused associated with this Offense: The defendant did conspire with another person an intentionally viewed and/or knowingly possessed or exercised control over any slide, photograph, film, videotape, computer depiction/other material depicting a child under the age of 18 years engaging in a 'prohibited sexual act' or in the simulation of such act; to wit: Defendant used a communication facility to obtain, view, control and otherwise possess one (1) image or similar representations depicting, the victim, a female child approximately 3 years of age engaged in a prohibited sexual act and depicting indecent contact with the child, in violation of the PA CC Sec. 6312 (d), a felony of the second degree.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 10/2/18	OTN/LiveScan Number	Complaint/Incident Number 56-2226
Defendant Name	First: KAYLA	Middle: R	Last: PARKER

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly 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.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	6320	(A)	of the	18	1	F2		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>	10	6320	(A)	of the	18	1	F2	
<input type="checkbox"/>					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): SEXUAL EXPLOITATION OF CHILDREN

Acts of the accused associated with this Offense: The Defendant did conspire with another person and did intentionally and/or knowingly procured a child under 18 years of age for the purpose of sexual exploitation as defined in this section; to wit: The Defendant intentionally and/or knowingly procured a child under 18 years of age for the purpose of manufacturing child pornography that depicts the victim, approximately 3 year old female child, engaged in prohibited sexual act in violation of the Pennsylvania Crimes Code Section 6320 (a), felony of the second degree.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	4304	(A)(1)	of the		1	F3		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>	11	4304	(A)(1)	of the		1	F3	
<input type="checkbox"/>					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): ENDANGERING THE WELFARE OF A CHILD

Acts of the accused associated with this Offense: The Defendant did conspire with another person and was a parent, guardian or other person supervising the welfare of a child under 18 years of age, or a person that employs or supervises such a person, did knowingly and/or intentionally commit an offense endangering the welfare of a child by violating a duty of care, protection or support; to wit: The Defendant, parent of the victim, performed sexual acts on her child and provided her child for the purpose of manufacturing child pornography, on numerous occasions, establishing a course of conduct of endangering her child, in violation of the PA CC Sec. 4304 (a)(1).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	3126	(A)(7)	of the	18	1	F3		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>	12	3126	(A)(7)	of the	18	1	F3	
<input type="checkbox"/>					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

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

Acts of the accused associated with this Offense: The Defendant did conspire with another person and intentionally and/or knowingly had indecent contact with the complainant, caused the complainant to have indecent contact with the person or intentionally causes the complainant to come into contact with seminal fluid, urine or feces for the purpose of arousing sexual desire in the person or the complainant and the complainant is less than 13 years of age; to wit: The Defendant intentionally/knowingly had indecent contact with genitalia of the approximately 3 year old victim, her daughter, and the indecent assaults were a course of conduct in violation of the PA CC Sec. 3126 (a)(7), a felony of the third degree.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: <u>10/2/18</u>	OTN/LiveScan Number	Complaint/Incident Number 56-2226
Defendant Name	First: PARKER	Middle: R.	Last: KAYLA

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 4.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

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

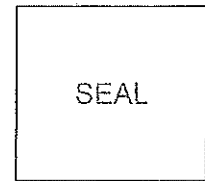
10/2 (Date) 2018 (Year)

R. Kay
(Signature of Affiant)

AND NOW, on this date 10/2/18 I certify that the complaint has been properly completed and verified.

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

32-2-51 (Magisterial District Court Number) *[Signature]* (Issuing Authority)





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

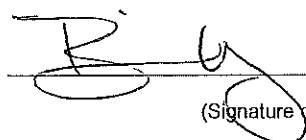
Docket Number:	Date Filed: 10/2/18	OTN/LiveScan Number	Complaint/Incident Number 56-2226
Defendant Name:	First: KAYLA	Middle: R.	Last: PARKER

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

Your Affiant is a Special Agent with the Pennsylvania Office of Attorney General. Your Affiant has been a law enforcement officer for over 12 years. Your Affiant has been employed as a Special Agent with the Pennsylvania Office of Attorney General since 2017. Prior to the current position of Special Agent, your Affiant was employed with the Pennsylvania State Police Bureau of Liquor Control Enforcement for 8 years, employed as an Investigator for the First Judicial District of PA for 3 years and was also employed as a Municipal Police Officer in North Wildwood, NJ in 2005. Your Affiant has a background in criminal and felony investigations. Your Affiant is currently an affiliate member of the Pennsylvania Internet Crimes Against Children Task Force (hereinafter referred to as PA ICAC). PA ICAC specially trains on and investigates crimes against children. Specifically, your Affiant is assigned to investigate crimes involving the online sexual exploitation of children. Your Affiant has been investigating internet crimes against children since July of 2017. Your Affiant has been trained in peer to peer file sharing through ICAC and completed the BitTorrent training program in 2017.

Additionally, as previously noted, your Affiant is a PA ICAC affiliate member. This PA ICAC Task Force is a statewide task force responsible for investigating cases involving the sexual exploitation of children via the internet. Your Affiant's duties include, but are not limited to, investigating violations of state law, such as the online exploitation of children. Your Affiant investigates violations of Title 18, Section 6312, which criminalizes the possession, receipt, and transmission of child pornography.

On Tuesday, 07/25/18, Your Affiant along with other agents from the Office of the Attorney General's Child Predator Section executed a search warrant at 7201 Bradford Road Apartment D207, in Upper Darby, Delaware County, for evidence related to an investigation into the possession, receipt, and transmission of child pornography over the internet. While executing the search warrant at the apartment, your Affiant and SA Eric Barlow interviewed David Carbonaro, who resided at the apartment. During the course of this interview, computer forensics agent, Special Agent Joseph Purfield made your Affiant aware that there were at least two photographic images and one video of a young female approximately three (3) years old on a digital camera located in Carbonaro's bedroom. These images depicted the young girl nude from the waist down and also showed her nude chest. There was also a video of the same girl approximately three (3) years old getting undressed to completely nude while sitting on a bed. These images and video were found on a blue Sony Cybershot digital camera that was located in Carbonaro's bedroom. Carbonaro explained that the video was taken by him and Carbonaro identified the three year (3) old by name to your Affiant. Your Affiant will identify the three year old girl depicted in the video and photos mentioned above as victim hereinafter. Carbonaro identified the victim as the daughter of Carbonaro's ex-girlfriend, Kayla Parker. Carbonaro explained that he lived with the victim and Parker two years ago and that they all lived at the 7201 Bradford Road, Apt. D207 in Upper Darby. Your Affiant was also able to preliminarily review the images and video of the victim on scene and confirm that the photos and video depict the victim engaged in prohibited sexual acts as defined in 18 C.S. § 6312, in violation of the Pennsylvania Crimes Code Section 6312(b), a felony of the second degree.



(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number:	Date Filed: <i>10/2/18</i>	OTN/LiveScan Number		Complaint/Incident Number 56-2226
Defendant Name:	First: KAYLA	Middle: R.	Last: PARKER	

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

As a result of this interview and the forensic review Carbonaro was arrested for the possession, distribution and manufacturing of child pornography.

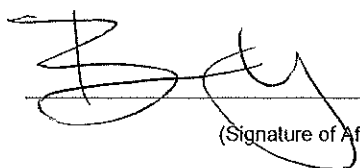
On August, 08/27/18, your Affiant reviewed all the images and videos found on the blue Sony Cybershot. There were a total of one hundred fifty-nine (157) images of the victim clothed in different levels of undress. Carbonaro described these images as a "photo shoot". In addition to those images, there were eight (9) images and one (1) video of the victim fully or partially nude. One of the images Your Affiant viewed was the victim sitting with an adult female. In this picture, the adult female's hand reaching inside of the victim's underwear, in the front of the victim's underwear, and the hand appears to be touching the victim's genitalia.

Further review of the blue Sony Cybershot showed numerous images of Kayla Parker, the victim's mother. Your Affiant was able to compare the images of Parker that showed her arm and the above described image of the arm reaching into the victim's underwear. After gathering this information, your Affiant contacted the Ohio Office of Attorney General and requested that special agents interview Parker in reference to this investigation.

On September 18, 2018, at approximately 1200 hours, Special Agent John Rodriguez and Special Agent William Jones with the Ohio Office of Attorney General's Bureau of Criminal Investigation (BCI) made contact with Parker at her residence located at 2319 S. Smithville Rd, Dayton, Ohio. Special Agent Rodriguez informed Parker of the investigation involving the victim and requested Parker to provide information. Parker agreed to meet Special Agent Rodriguez and Special Agent Jones at the Dayton Police Department 2nd District sub-station located at 2721 Wayne Ave, Dayton, Ohio. Once arriving at the station, K. Parker was escorted to an interview room. Special Agent Rodriguez informed Parker this is a criminal investigation and explained that Ohio BCI had been requested to conduct the interview regarding the allegations involving the victim. Special Agent Rodriguez informed Parker of her right to have an attorney present during this interview and the instructions regarding her Miranda Rights were read from a prepared text from an Ohio BCI Miranda Waiver form.

At the conclusion of being advised of her rights, Parker was asked her level of education and if she had any difficulty understanding her rights as explained by Special Agent Rodriguez. Parker reported she was a high school graduate with the ability of reading and writing. Parker reviewed the Miranda Waiver form provided by Special Agent Rodriguez and signed and dated the document and agreed to give a statement without having a lawyer present for this interview.

Parker reported that she was contacted by the Ohio Department of Children and Family and was informed there was an ongoing investigation involving David Carbonaro in Pennsylvania. Parker reported Carbonaro had been in possession of inappropriate images of the victim, who she identified as her child. Parker reported that she lived with Carbonaro, the victim and a second child while in Pennsylvania. She identified the 7201 Bradford Road Apartment D207, Upper Darby apartment as an apartment she shared with the victim and Carbonaro.



(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number:	Date Filed: 10/2/13	OTN/LiveScan Number	Complaint/Incident Number 56-2226
Defendant Name:	First: KAYLA	Middle: R.	Last: PARKER

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

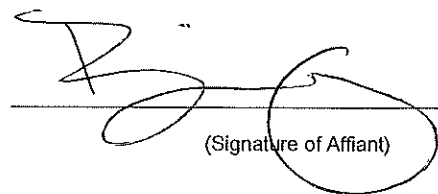
Parker reported that during the time she lived with Carbonaro, Carbonaro had her commit inappropriate sexual acts with the victim. Parker reported that on numerous occasions Carbonaro would have her undress the victim, and Parker would escort the victim to a bedroom where Carbonaro was waiting. Parker would then shut the door after the victim had entered the bedroom. Parker claimed that she never witnessed the victim being sexually abused, but explained she was certain Carbonaro was entered the bedroom. Parker claimed that she never witnessed the victim being sexually abused, but explained she was certain Carbonaro was acting inappropriate with the victim. When asked if she had ever reported the abuse to anyone, Parker stated that she had not.

Parker was shown the above described photograph of the female hand touching the victim's genitalia and she replied that her hand, which was cropped from the photograph "was south" where it shouldn't have been on the victim. Parker identified the victim in the photograph as her daughter. It should be noted that the victim depicted in the photo was approximately three years old when the photo was taken. Parker was asked what she meant by her hand was "south." Parker reported she had placed her hand inside of the victim's underwear. Parker reported she was told by Carbonaro to put her hand on the victim and she had done this on more than one occasion. According to Parker, Carbonaro would watch her abusing the victim and often masturbate during the act. Parker could not recall when the last incident took place, but she was certain that it occurred while she was residing with Carbonaro at 7201 Bradford Rd, Apt 207 Upper Darby, Pennsylvania.

Parker reported she lived with Carbonaro for approximately one year. Parker reported she had been living in Ohio for approximately four years and had not had contact with Carbonaro since relocating to Ohio. When asked why she had not reported what had occurred in Pennsylvania, Parker reported she was in fear of getting in trouble. Kayla Parker agreed to write an apology letter to the victim. In the letter, Parker apologized for the abuse perpetrated on the victim. The letter was signed and dated by Kayla Parker and turned over to Special Agent Rodriguez at the conclusion of the interview.

Kayla Parker agreed to write an apology letter to the victim. In the letter, Parker apologized for the abuse perpetrated on the victim. The letter was signed and dated by Kayla Parker and turned over to Special Agent Rodriguez at the conclusion of the interview.

On September 25, 2018 SA Rodriguez and SA Andrea Kinzig responded to 2319 S. Smithville Rd. Ohio, the residence of Kayla Parker, to conduct a follow up interview concerning this ongoing investigation. This interview took place in SA Kinzig's vehicle, the doors were unlocked and Parker was advised that she was free to leave at any time. Parker was advised that she had the right not to answer questions regarding this investigation and she was not being taken into custody following the conclusion of this interview.



(Signature of Affiant)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 10/2/18	OTN/LiveScan Number	Complaint/Incident Number 56-2226
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AFFIDAVIT of PROBABLE CAUSE

During this interview Parker was asked questions pertaining to the photograph taken with her hand in the underwear of the victim. Parker explained that the photograph was of her placing her right hand in the underwear of her daughter, the victim. She further explained that the photograph was taken by David Carbonaro.

Based on the aforementioned facts, your Affiants request that a warrant be issued for the arrest of the defendant, Kayla Parker, for the offenses of Manufacturing Child Pornography, 18 Pa.C.S. § 6312(b)(1), Criminal Conspiracy to Manufacturing Child Pornography, 18 Pa.C.S. § 903; § 6312(b)(1), Manufacturing Child Pornography, 18 Pa.C.S. § 6312(b)(2), Criminal Conspiracy to Manufacturing Child Pornography, 18 Pa.C.S. § 903; § 6312(b)(2), Possession of Child Pornography, 18 Pa.C.S. § 6312(d), Criminal Conspiracy to Possession of Child Pornography, 18 Pa.C.S. § 903; § 6312(d), Sexual Exploitation of Children, 18 Pa.C.S. § 6320(a), Criminal Conspiracy to Sexual Exploitation of Children, 18 Pa.C.S. § 903; § 6320(a), Endangering the Welfare of a Child, 18 Pa.C.S. § 4304(a)(1), Criminal Conspiracy to Endangering the Welfare of a Child, 18 Pa.C.S. § 903; § 4304(a)(1), Indecent Assault, 18 Pa.C.S. § 3126(a)(7), and Criminal Conspiracy to Indecent Assault, 18 Pa.C.S. § 903; § 3126(a)(7).

I, B KING, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

B King
(Signature of Affiant)

Sworn to me and subscribed before me this 2 day of October 18
Date _____, Magisterial District Judge

My commission expires first Monday of January, 2024

