COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA COUNTY OF: MONTGOMERY VS. Magisterial District Number: 38-1-23 **DEFENDANT:** (NAME and ADDRESS): MDJ: Hon. DEBORAH LUKENS **GARR ALEXANDRA** Address: 4002 CENTER AVENUE Middle Name Last Name Gen First Name LAFAYETTE HILL, PA 19444 2101 BLACKHORSE DRIVE WARRINGTON PA, 18976 Telephone: (610)828-5526 NCIC Extradition Code Type ☐ C-Misdemeanor Surrounding States 5-Felony Pending Extradition ☐ 1-Felony Full ☐ Distance: ☐ D-Misdemeanor No Extradition ☐ 6-Felony Pending Extradition Determ. 2-Felony Limited ☐ E-Misdemeanor Pending Extradition □ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Complaint/Incident Number OTN/LiveScan Number Docket Number Date Filed ☐ YES 🖾 NO CR-150 10/25/18/0641 IFS-2018-0178 Co-Defendant(s) ров 05/07/1990 POB Add'I DOB **GENDER** Gen. Middle Name Last Name First Name ☐ Male AKA Asian Black Native American Unknown RACE White ■ Hispanic Unknown ETHNICITY Non-Hispanic BRO (Brown) ☐ PLE (Purple) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) GRY (Gray) Hair PNK (Pink) GRN (Green) ☐ WHI (White) XXX (Unk./Bald) BLK (Black) ONG (Orange) Color ☐ BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BLU (Blue) BRO (Brown) BLK (Black) Eye MAR (Maroon) PNK (Pink) XXX (Unknown) Color HAZ (Hazel) ☐ MUL (Multicolored) WEIGHT (lbs.) **DNA Location** ☐ YES ☐ NO DNA 150 FBI Number **MNU Number** Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO 3 5 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh, Code Reg. Comm'l Veh. Registration State Haz Ind. same as mat Plate # Sticker (MM/YY) Def. Style Color Model Year Make VIN 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). SDAG KENNETH MCDANIELS (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) 716704 SSA RICHARD BOWES (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) I accuse the above named defendant who lives at the address set forth above

(Identify Department or Agency Represented and Political Subdivision)
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 [46] 5165 Campus Drive Plymouth (Subdivision Code) (Place-Political Subdivision)

In MONTGOMERY County [46] on or about 06/18/2018



Docket Number:	Date	Filed:	OTN/Live	Scan Num		Com	plaint/Incident	Number
Defendant Name:	First:	_/L ANDRA	Middle	.	1	Last: GARR	<u> </u>	
When there is m (Set forth a brief sum	ted by the accione than one output of the facts sufficient. In a sure, at the time of the	used are descr ffense, each o sufficient to advis nmary case, you r offense may be ir	ffense should be the defendant of nust cite the specif ncluded if known. It	e numbere the nature of ic section(s) anddition, so	of Assemb ed chronolo the offense(s and subsection	oly or statut ogically. s) charged. A on(s) of the st numbers and	citation to the stat atute(s) or ordina financial informat	lated, if appropriate. tute(s) allegedly violated, nce(s) allegedly violated. ion (e.g. PINs) should not
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PennDOT Data (if applicable)	Accident N	lumber	_		Interstate		Safety Zone	☐ Work Zone
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Docket	Numl	oer:	D	ate File	d:	ОТ	N/LiveScan I	Numbe	r			aint/Incident Nun 018-0178	nber
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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS-2018-0178
Defendant Name:	First: ALEXANDRA	Middle:	Last: GARR

- 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 $\underline{7}$.
- 5. 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 that non-confidential information and documents.

of Pennsylvania and well	re contrary to the Act(s) rest can be issued, an	of the Ass	er, were against the peace and dignity of the Commonwealth embly, or in violation of the statutes cited. of probable cause must be completed, sworn to before the
	06-1		(Signature of Affiant)
(Date)	(Year)		
AND NOW, on this date	october 25,	2018	I certify that the complaint has been properly completed and verified.
An affidavit of probable cau	use must be completed be	fore a warra	ant can be issued.

(Magisterial District Court Number)

Issuing Authority)

SEAL

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS-2018-0178
Defendant Name:	First: ALEXANDRA	Middle:	Last: GARR

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant, Special Agent Richard Bowes, of the Insurance Fraud Section of the Pennsylvania Office of the Attorney General, being duly sworn, deposes and says:
- B. Your Affiant was assigned to investigate an allegation of insurance fraud pertaining to the submission of false information regarding an auto accident and the subsequent insurance claim for that loss. The subject of this investigation is Alexandra Garr, DOB 05/07/1990, 3201 Morning Glory Road, Philadelphia, PA 19154. Progressive Insurance policy number #914140943001, claim number 182835187, and date of loss 06/18/2018. Garr provided false information to Progressive Auto Insurance Company ("Progressive") by purchasing an auto policy after being involved in an automobile accident. Progressive denied the claim. However, the reserve amount not paid by Progressive was set at \$6,000.00. The facts below provide probable cause to demonstrate Williams committed Insurance Fraud.
- C. Your Affiant reviewed documents given to him by Angela Gaster, a Special Investigator for Progressive Auto. Your Affiant then spoke to Angela Gaster. Based on the review of the file, Your Affiant learned the following:
 - 1. On 05/21/2018, Progressive Auto Policy #914140943001 was canceled for non-payment.
 - 2. On 06/18/2018, at 5:06 p.m., Alexandra Garr was involved in an auto accident at the intersection of F and Tioga Streets in the city of Philadelphia. Garr's vehicle was third in line at the traffic light. The first vehicle in line was attempting to make a left turn, and the second vehicle in line was a box truck. Garr attempted to drive around the box truck and was struck by the truck. Garr's vehicle was then pushed into a parked vehicle.
 - 3. On 06/18/2018, Philadelphia Police were dispatched to the scene of the accident at 5:11 p.m., and accident report #18-25-047170 was taken.
 - 4. On 06/18/2018, at 5:34 p.m. Garr's Progressive Auto Insurance Policy #014140943001 was reinstated via the internet.
 - 5. On 06/18/2018, at approximately 10:00 p.m., Garr made a claim of loss via the mobile claim app of Progressive Insurance.
 - 6. A statement of no loss was signed by Garr at 5:34 p.m., on 06/18/2018. On the statement of no loss Garr verified that she was not involved in any auto accidents or had no damage to her vehicle between 12:01am on 05/21/2018 and the time she signed the document on 06/18/2018, 5:34 p.m.

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Defendant Name:	First: ALEXANDRA	Middle:	Last: GARR

- 7. On 06/20/2018, Garr gave a recorded statement to Progressive Auto and stated the accident happened at 5:15-5:20 p.m. Garr was asked about the policy lapse and Garr stated that her mom gave her the paperwork, but she had forgotten to reinstate her policy, so she did it earlier in the day on 06/18/2018.
- D. Your Affiant obtained Philadelphia Police Accident report #18-25-047170. As a result, your affiant learned the following:
 - 1. Philadelphia Police were contacted about the accident at 5:06pm and police were dispatched at 5:11pm on 06/18/2018 to F and Tioga Streets.
 - 2. According to the police report Garr showed the police an insurance policy that had been canceled. This policy that was the same policy that was canceled on 05/21/2018, because of non-payment. Progressive policy #914140943.
- E. On 10/16/2018, Your Affiant interviewed Alexandra Garr in reference to her auto accident. Based on the interview, Your Affiant learned the following:
 - 1. Garr confirmed that she was involved in an auto accident on 06/18/2018 at F and Tioga Streets, in the city of Philadelphia.
 - 2. Garr admitted that she knew her insurance policy had been canceled on 05/21/2018.
 - 3. Garr was asked if she purchased her insurance after she was involved in an auto accident on 06/18/2018 and she answered, "Yes".
 - 4. Garr admitted that she answered "No" to the 'Statement of no loss.' The 'Statement of no loss' asked if Garr's vehicle had no damage and if it had not been involved in an auto accident prior to purchasing her insurance.
- F. Based on the foregoing, Your Affiant believes that probable cause exists and that Alexandra Garr has committed the following crimes:

18 PA. C.S.A. 4117(a) (1) Insurance Fraud (F3)

18 PA. C.S.A. 4117(b) (4) Insurance Fraud (M1)

18 PA. C.S.A. 7512 Unlawful Use of Communication Facility (F3)

18 PA. C.S.A. 3922 (a) (1) Criminal Attempt Theft by Deception (F3)



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Defendant Name:	First: ALEXANDRA	Middle:	Last: GARR

I, SSA RICHARD BOWES, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	THE	7	
	(Sigr	nature of Affiant)	
Sworn to me and subscribed before me this day of	October	201	8
Date lafted tufer	, Magister	rial District Judge	
My commission expires first Monday of January,			
		SEAL	

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: MONTGOMERY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 38-1-23 VS. (NAME and ADDRESS): MDJ: Hon. DEBORAH LUKENS **JONES** Address: 4002 CENTER AVE. antar KNIGHT First Name Middle Name Last Name LAFAYETTE HILL PA. 19444 155 EAST GODFREY AVENUE APT.# H204 PHILADELPHIA PA 19120 Telephone: (610)828-5226 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 2-Felony Limited ☐ E-Misdemeanor Pending Extradition A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition 4-Felony No Extradition B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION OTN/LiveScan Number Complaint/Incident Number Request Lab Services? Docket Nymber 180631486-2 ☐ YES ☒ NO CR-IF-2018-0051 Co-Defendant(s) **GENDER** ров 05/01/1995 Add'l DOB Male Male First Name Middle Name Last Name Gen. ☐ Female **AKA** Black RACE White ☐ Asian Native American Unknown Unknown ETHNICITY Hispanic Non-Hispanic BRO (Brown) SDY (Sandy) BLU (Blue) PLE (Purple) GRY (Gray) RED (Red/Aubn.) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eve HAZ (Hazel) MAR (Maroon) PNK (Pink) Color MUL (Multicolored) XXX (Unknown) **DNA Location** DNA ☐ YES WEIGHT (lbs.) FBI Number **MNU Number** Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION State Comm'l Veh. School Veh. Oth, NCIC Veh, Code Reg. Haz Registration Ind. \square Plate # KNP5592 mat same as PA Sticker (MM/YY) Def. Make Model Style Color VIN Year Sdn Black 2G11Z5SAXH9165223 2017 Chevrolet Impala (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). SDAG ROBERT LABAR rney for the Commonwealth) (Name of the attorney for the Commonwealth) (Signature of the a SA JOSEPH JONAS #564 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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

(Subdivision Code)

on or about DECEMBER 31,2017 THRU JANUARY 22, 2018

in MONTGOMERY County

Meeting, Pa.

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [107]

(County Code)

[46]

5165 Campus Drive Plymouth

(Place-Political Subdivision)

•		•				P P	OLICE	CRIMINAL	COMPLAINT
	Number:		Filed:	OTN/LiveSca	n Numb	er	1	plaint/Incident N 018-0051	umber
<u> </u>	ant Name	First.		Middle: KNIGHT		I .	ast: IONES		
When to (Set forth without n	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. 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.)								
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Lead?	Offense	Section	(a)(2) Subsection	PA Statut	e (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
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Docket Number:	Date Filed: C _{[/} 2 <i>L</i> / 1分	OTN/LiveScan Number しし31486-2	Complaint/Incident Number IF-2018-0051
	First:	Middle:	Last:
Defendant Name:	ANTAR	KNIGHT	JONES

AFFIDAVIT of PROBABLE CAUSE

- A) Your Affiant is Joseph Jonas Special Agent employed by the Pennsylvania Office of Attorney General (OAG); Bureau of Criminal Investigation (BCI), Insurance Fraud Section. Your Affiant has over (28) years of law enforcement/criminal investigative experience and being duly sworn according to law deposes and says:
- B) The OAG received an Insurance Fraud Referral from Progressive Insurance Company (Progressive) Special Investigator Angela Gaster (Gaster). Gaster alleged that Antar Jones (Jones) DOB May 5, 1995 currently residing at 155 East Godfrey Avenue in Philadelphia, Pa committed insurance fraud and attempted theft. Jones is alleged to have filed a claim with Progressive for vehicle damages sustained prior to obtaining a policy with Progressive, in order to have his vehicle repaired. The facts below provide probable cause to believe Jones committed Insurance Fraud; Criminal Attempt to Commit Theft by Deception, False Reports to Law Enforcement Authorities and Criminal Use of Communication Facility by providing false and misleading information and forged documents to Progressive through the use of his iPhone.
- C) In connection with this investigation your Affiant reviewed the Progressive claim file. Your Affiant interviewed Progressive Special Investigator, Angela Gaster (Gaster) and reviewed the file with her. Based on the review of the file and an independent investigation, your Affiant learned the following:
- 1) On January 2, 2018, Jones contacted Progressive to secure an automobile policy for his 2017 Chevy Impala VIN# 2G11Z5SAXH9165223. Progressive issued a policy #917920067000 to Antar Jones 4046 Castor Avenue Philadelphia, PA., at 10:50 am.
- 2) On January 6, 2018, at 3:54 pm Jones called Progressive Insurance Company to file an automobile accident claim. Jones provided information regarding the accident to Progressive claims department. Jones claimed that the accident occurred on January 6, 2018, at 6:30 am in the area of Gypsy Lane and Lincoln Drive in Philadelphia. Jones stated that no Police report was taken at the scene. Jones stated that he went to the 14th District in Philadelphia located at 43 West Haines Street Philadelphia to file the report.
- 3) On January 9, 2018, Jones gave a recorded statement with Progressive Insurance adjuster Jennifer Cobb (Cobb) in reference to the claim he filed. Jones claimed he had been in an accident on January 6, 2018 at approximately 6:30 am in the area of Gypsy Lane and Lincoln Drive in Philadelphia. Jones stated that his vehicle was towed to A&Z Auto Doctor at 1339 Windrim Avenue in Philadelphia.
- 4) On January 10, 2018, Jones sent photos of his vehicle's damage to Cobb via email from his phone. Cobb received these photos at her office, located at 5165 Campus Drive in Plymouth Meeting, PA. Metadata from these photos indicate they were created on December 31, 2017 and January 1, 2018.



	Docket Number: CR-129-18	Date Filed: 9 /26/18	U6319	TN/LiveScan Number もらしっこ		Complaint/Incident Number IF-2018-0051
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-4	Defendant Name:	ANTAR		KNIGHT	JO	NES .

- 5) On January 12, 2018, Progressive adjuster Jon Mednick performed an written estimate of the damages to be \$ 6,705.03
- D) On August 15, 2018, your Affiant interviewed the owner of A&Z Auto Doctor Rick Johnson (Johnson). Johnson stated that Jones' vehicle was towed into his shop. Johnson produced a tow slip dated January 5, 2018 as the date of the tow for Jones' vehicle. Johnson was shown a copy of the original receipt dated January 1, 2018, for the tow of Jones vehicle. Johnson could not explain the discrepancies in the two tow slips.
- E) On August 16, 2018, your Affiant went to the 39th District of the Philadelphia Police Department and received a copy of the Accident report dated "1/6/2018" with a control Number # 18-39-000998.
- F) On August 30, 2018 at 12:18 pm. Your Affiant interviewed the tow truck driver Marshall Gray (Gray) in the parking lot of Home Depot located in the 4600 Block of Roosevelt Boulevard in Philadelphia, PA. Gray gave a recorded statement. Gray stated that he remembers towing Jones' 2017 Chevy Impala on January 1, 2018 from the area of Old York Road and Chelten Avenue in Philadelphia and then transporting the vehicle to A&Z Auto Doctor at 1339 Windrim Avenue. Gray stated he remembers the vehicle because it was early in the morning New Year's Day, it was a new car and it hit a pole at the corner of Old York Road and Chelten Avenue and that the vehicle had damage to the front passenger side and front suspension. Gray was shown copies of the two tow slips; he stated that is his hand writing on the one dated "1-1-18" and not his handwriting on the one dated "1-5-18".
- G) On August 30, 2018 at 1:00 pm your Affiant Interviewed Antar Jones at his home 155 E. Godfrey Avenue Apartment H204 in Philadelphia. Jones Stated that he called Progressive Insurance on January 6 and stated that he was involved in an auto accident at Gypsy Lane and Lincoln Drive in Philadelphia earlier that day coming home from work and had taken pictures at the time of the accident. Jones later reported to the Police that the accident happened on January 6, 2018. Jones stated that after the accident he had the vehicle towed to A&Z Auto Doctor on Windrim Avenue in Philadelphia. Jones was shown a copy the tow slip dated "1-1-18" and asked if that was his signature on the bottom of the slip. Jones stated that it was his signature, Jones was then asked why the slip was dated "1-1-18" if he reported the loss happened on January 6, 2018. Jones stated he lied to the insurance company so he can get his car repaired.

,				POL	ICE CRIMINAL COMPLAIN
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Defendant Name:	ANTAR		KNIGHT	JONI	ES ·
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AND NOW, on this da	te 9-26-	18	I certify that the co	mplaint l	nas been properly completed and verified.
An affidavit of probabl	e cause must be c	ompleted before	e a warrant can be issued.		
Magisterial District Co	Sourt Number)		Astraf pro (Issuing Authority)	les .	SEAL
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Complaint/Incident Number IF-2018-0051	er	OTN/LiveScan Num	U 63 1	Date Filed: G /24/ ነ ଓ	ocket Number: LR -1 2 9 - 1 8
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I, SA JOSEPH JONAS, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

5	A soul
	(Signature of Affiant)
Sworn to me and subscribed before me this 24 day of	September 2018
Date Lefotal Juher	, Magisterial District Judge
My commission expires first Monday of January, 5024	
	SEAL

	COMMONWEALTH OF PENNSYLVANIA COUNTY OF: CHESTER				المركبية	2			CRIMII WEALTH						
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				1887 P(OLICE (CRIMINAL	COMPLAINT
Docket Number:	Date Filed: / /	ОТ	N/LiveScan Numl	ber		laint/Incident N 18-0954	lumber
Defendant Name:	First: ASFAND		Middle:		ast: \LI	13100	
The acts committed by When there is more tha (Set forth a <i>brief</i> summary of without more, is not sufficier The age of the victim at the tibe listed. If the identity of an	the accused are in one offense, the facts sufficient it. In a summary cas me of the offense n	each offense sho to advise the defen- se, you must cite the nay be included if kn	ould be numbered dant of the nature of especific section(s) nown. In addition, so	ed chronolog the offense(s) and subsection cial security n	gically. charged. A c n(s) of the sta umbers and fi	itation to the statu stute(s) or ordinand inancial informatio	ite(s) allegedly violated, ce(s) allegedly violated.
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Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number IF 2018-0954
Defendant Name:	First: ASFAND	Middle:	Last:	

- 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 $\underline{}$.

issuing authority, and attached.)

5. 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 that 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

Docket Number:	Date Filed:	OTN/LiveScan Number	4	Complaint/Incident Number
				IF 2018-0954
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Defendant Name:	ASFAND		ALI	

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant is Special Agent Paul Blash of the Insurance Fraud Section of the Pennsylvania Office of Attorney General. Your Affiant has thirty-two years of law enforcement/investigative experience. Your Affiant has participated in hundreds of investigations and arrests for violations of the Pennsylvania Crimes Code. Your Affiant, having been duly sworn according to law, deposes and says:
- B. The Pennsylvania Office of Attorney General received a referral from Jan Sherlock, Special Investigator for the Encompass Insurance Company. Encompass is a subsidiary of the Allstate Insurance Company. Sherlock alleged that a male subject identified as Asfand Ali, (a/k/a Ozzie Ali, DOB 02-16-1975), who resided at 69 North Danbury Circle East Fallowfield, PA, committed Insurance Fraud. Sherlock alleged that on 02/23/2018, Asfand Ali added a 2012 Mercedes Benz GL 550 to his existing Encompass Automobile Insurance Policy (#0281830383). On 04/02/2018, Ali submitted an accident claim to Encompass, reporting that he had parked his Mercedes, but left the transmission in neutral position, which caused the car to roll backwards into a wooded area, causing damage to the car. In connection with Ali's claim, his wife, Christen Ali, also told Allstate about the incident and described the same damage as having occurred as a result of the incident. Allstate's investigation found that the damage that both Asfand Ali and Christen Ali claimed to have resulted from this incident was present on the car before they bought it. As summarized below, your Affiant investigated Allstate's allegations and, as a result, confirmed that Asfand Ali and Christen Ali both made false statements to Encompass about the damage to the car in furtherance of Asfand Ali's claim and that, therefore, both Asfand Ali and Christen Ali had conspired to commit and did commit Insurance Fraud and related crimes.
- C. Your Affiant interviewed Jan Sherlock, Special Investigator for Encompass Insurance Company, reviewed the claim file, listened to audio recordings, and viewed photographs provided by Sherlock. As a result, your Affiant learned the following:



Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number IF 2018-0954	
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1. On 02/22/2018, Asfand Ali purchased a 2012 Mercedes Benz GL 550 bearing vehicle identification number 4JGBF8GE2CA789964 and Pennsylvania registration KPK-2324 from Conshohocken Porsche Audi. On 02/23/2018, Asfand Ali added the Mercedes to his existing Encompass automobile policy number 0281830383.

2. On Monday, 04/02/2018, Ali called Encompass via telephone to report a claim. The claim call was audio recorded and assigned claim number Z0333168. During that call, Ali claimed that he had an accident and that, as a result, his 2012 Mercedes incurred damage to the rear bumper, driver's side rear wheel well, and driver's door. When asked when this accident occurred, Ali replied, "Saturday." The Encompass representative then said "the 31st" (i.e., Saturday, 03/31/2018) and Ali agreed that that was the date. Ali described the accident to Encompass as follows:

Asfand Ali and his family were at Hibernia Park in Coatesville, PA. Ali parked the Mercedes and he and his family walked away from the car. However, because he accidently left it in neutral, the car rolled backwards, down a hill, and struck a rock and several trees, causing the claimed damage.

3. Jan Sherlock conducted a recorded interview of Asfand Ali on 04/20/2018. As he had reported in his initial claim call, Ali claimed that his car was damaged on 03/31/2018 and recounted the series of events provided in that initial claim call. Sherlock specifically asked Ali if there was any previous damage to his car before the present claim; Ali responded that there was only minor paint damage to the car and that it had no major body damage. Ali stated that he did not take any photographs of his car when he purchased it. Ali specifically explained that the front driver's door was damaged when he tried to get back into the car in an effort to stop the car as it was rolling backwards. Ali also told Sherlock that no pictures of the damage were taken at the park where the incident occurred, but that he would send her the photos that he took when he returned home after the accident. (Ali later sent to Sherlock photos showing the damage that he



Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number IF 2018-0954
	First:	Middle:	Last:	
Defendant Name:	ASFAND		ALI	

claimed.) After Ali reported that this incident occurred on 3/31/18, Sherlock told him that Encompass had learned that he brought his car to the Union Park Collision Center for a repair estimate on 03/20/2018 (i.e., eleven days before the reported date of loss of 03/31/2018). Ali responded that the damage occurred on 03/17/18 (i.e., two weeks earlier than he had initially reported) and that he was confused regarding the date of the accident. Ali called back later and said that, after speaking with his wife, he determined that the incident was 03/18/2018. (Sherlock has provided your Affiant with a copy of the Union Park Collision Center estimate, dated 03/20/18, which identified damages to, among other parts, the left rear bumper, left quarter panel and wheel-well, and the left driver's door of Ali's Mercedes. The estimated cost to repair was the car was \$2,799.20).

- 4. Christen Ali is the wife of Asfand Ali and co-policyholder on their Encompass automobile insurance policy. On 04/27/2018, Jan Sherlock interviewed Christen, via phone at her residence in East Fallowfield, PA about her husband's claim and the damage to the Mercedes. Christen stated that the accident occurred at Hibernia Park on 03/18/2018. Christen recounted how the car rolled downhill and caused damage to the driver's door and to the driver's side rear wheel well. Christen told Encompass that the driver's door was damaged when her husband opened the door in an attempt to get into the car while it was rolling down the hill. Christen also claimed that, as a result of this incident, there were scratches on the car. Christen told Sherlock that her husband photographed the damage to the car when they returned home after the accident. Sherlock specifically asked Christen if there was any previous damage to the Mercedes and she replied that there was no damage to the car, that she and her husband take great care of their cars, and that the Mercedes was in really good condition. Christen also stated that they buy all their cars in good condition.
- 5. Your Affiant notes that the "metadata" for the photographs that Asfand Ali provided to Sherlock in order to show the damage to the car indicates that the photographs were taken on 04/02/2018, i.e., 15 days after both Christen and Asfand said that



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Defendant Name:	ASFAND		ALI

Asfand took the photos. (In the context of digital photos, "metadata" is digitally stored information about the photo, including such information as the type of device that was used to take the photo, the date the photo was taken, the location of the photo, the file size of the photo, etc. This information is stored within the digital photo file itself.)

- 6. On 05/07/2018, Jan Sherlock asked Asfand Ali to provide paperwork related to his purchase of the Mercedes and to all estimates for repairs since the date of purchase. Ali did not provide such paperwork and, instead, withdrew his claim on 05/10/2018.
- D. On 09/12/2018, your Affiant interviewed Jim Satterthwaite, General Manager for Conshohocken Porsche Audi. Satterthwaite provided the following information. On 02/23/2018, Conshohocken Porsche Audi sold a 2012 Mercedes Benz, bearing vehicle identification number 4JGBF8GE2CA789964, to Asfand Ali. The car was sold in "as is" condition, with damage to the rear bumper, driver's door, and driver's side rear wheel well. The Mercedes was previously owned by Tom McLaughlin, who resided at 142 South Washington Street, Wilkes Barre PA 18701.
- E. On 09/10/2018, your Affiant interviewed Tom McLaughlin at his business located in Wilkes Barre, PA. McLaughlin stated that he owned a 2012 Mercedes Benz GL550 bearing vehicle identification number, 4JGBF8GE2CA789964 which he traded in to Conshohocken Porsche Audi in December 2017. Your Affiant showed McLaughlin the photographs that Asfand Ali has sent to Encompass Insurance in order to support his claim of damage to his car and McLaughlin immediately identified all of the damage shown in the photographs as damage that was present on the car when he owned it and was still present when he traded the car in to Conshohocken Porsche Audi in December of 2017. McLaughlin explained that some of the damage was caused by an accident that occurred when his wife, Kathleen, was driving on 05/06/2014 and that there was additional damage caused in subsequent accidents before he traded in the car. One of the photos that your Affiant showed to McLaughlin depicted damage to the driver's side rear wheel-well damage and showed Asfand Ali holding a broken piece of



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Defendant Name:	ASFAND		ALI

side molding from that wheel well; McLaughlin specifically recalled that that piece of molding had been broken off in his wife's accident on 05/06/2014 and that he left the piece of molding in the trunk of the car. McLaughlin stated that the damage from his wife's 05/06/2014 accident was submitted to his insurance company, Atlantic States Insurance Company policy number CAA8663018. Atlantic States Insurance is a subsidiary of Donegal Insurance Company. McLaughlin also reported that he never had either the 05/06/2014 damage or the damage caused by subsequent accidents repaired and that he traded in the car to Conshohocken Porsche Audi with the damage still present and the broken piece of molding still in the trunk of the car.

- F. On 09/28/2018, your Affiant received the claim file from Donegal Insurance for their subsidiary Atlantic States Insurance Company for policy 3CAA-8663018. The file involved claim #CAA-PA01-14-0415570 for an accident that occurred on 05/06/2014 involving the 2012 Mercedes Benz GL 550 bearing vehicle identification number 4JGBF8GE2CA789964 and operated by Kathleen McLaughlin. Included in that claim file were Donegal's photographs of this damage to the 2012 Mercedes Benz. The photographs depict the same damage claimed by Asfand Ali in connection with his 04/02/2018 claim to Encompass Insurance.
- G. Based on the foregoing, your Affiant concludes that probable cause exists to establish that Asfand Ali committed the following crimes:

18 Pa.C.S.A. §4117(a)(2)	Insurance Fraud (F3)
18 Pa.C.S.A. §901 / §3922(a)(1)	Criminal Attempt / Theft by Deception (F3)
18 Pa.C.S.A. §903(a)	Criminal Conspiracy (F3)
18 Pa.C.S.A. §7512(a)	Criminal Use of Communication Facility (F3)



					
Docket Number:	Date Filed: O		OTN/LiveScan Number		Complaint/Incident Number
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Defendant Name:	ASFAND			AL]	[

I, SPECIAL AGENT PAUL BLASH, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

		(Signature of Affiant)
Sworn to me and subscribed before me this	day of	
Date		, Magisterial District Judge
My commission expires first Monday of January,		SEAL
		Company Company

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: MONTGOMERY

Magisterial District Number: 38-1-23 MDJ: Hon. Deborah A. Lukens Address: 4002 Center Avenue Lafayette Hill, PA 19444



First Name

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA

VS.

(NAME and ADDRESS):

ESTHEL Middle Name LATIMER Last Name

166 West Champlost Street Philadelphia, Pa 19120

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Complaint/Incident Number

IF-2108-0229 Middle: Last: First **Defendant Name: ASHLEY ESTHEL** LATIMER 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. 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 ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 F3 \boxtimes 1 4117 (a)(2)TITLE 18 1 NCIC Offense Offense Grade Section Subsection PA Statute (Title) Counts Lead? Code PennDOT Data **Accident Number** ☐ Interstate ☐ Safety Zone if a licable Statute Description (include the name of statute or ordinance): INSURANCE FRAUD Acts of the accused associated with this Offense: The defendant did, knowingly and with intent to defraud an insurer, present or cause to be presented to an insurer a statement, orming a part of, or in support of , a claim which contained false, incomplete or misleading information concerning a fact or thing material to a claim, to wit: The defendant, made at least one materially false, incomplete or misleading statement in order to cause Progressive Insurance Company to pay insurance, which Progressive was not obligated to pay, in connection with a vanadalism claim that occurred on or about August 17,2018. ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Inchoate 18 903 Offense 18 901 A 18 902 A TITLE 18 1 F3 冈 2 3922 (a)(1) **NCIC Offense UCR/NIBRS** Code Subsection PA Statute (Title) Counts Grade Lead? Offense# Section Code PennDOT Data ☐ Safety Zone ☐ Work Zone Accident Number ☐ Interstate if a licable Statute Description (include the name of statute or ordinance): CRIMINAL ATTEMPT / THEFT BY DECEPTION Acts of the accused associated with this Offense: The defendant did, with the intent to commit Theft by Deception, 18 Pa. C.S.A. § 3922(a), commit an act which constituted a substantial step toward the commission of said crime, to wit: defendant made at least one materially false, incomplete or misleading statement in order to cause Progressive Insurance Company to pay insurance benefits in excess of \$2000, which Progressive was not obligated to pay, in connection with a vanadalism clain, that occurred on or about August 17, 2018. ☐ Conspiracy Inchoate ☐ Solicitation ☐ Attempt Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense F3 TITLE 18 \boxtimes 3 7512 (a) PA Statute itle UCR/NIBRS Code Lead? Offense# Section Subsection Counts Grade **NCIC Offense Code** PennDOT Data Accident ☐ Work Zone Interstate ☐ Safety Zone Number if a licable

OTN/LiveScan Number

Date Filed:

Docket Number:

Acts of the accused associated with this Offense: Defendant used a communication facility, a telephone or cellphone, to commit, cause, or facilitate the commission or the attempt thereof of a crime which constitutes a felony, to wit: On August 24,2018, defendant used a telephone or cellphone to make at least one false, incomplete or otherwise misleading statement in connection with a vanadalism claim with Progressive Insurance Company and, by doing so, committed, caused, or facilitated the commission or the attempt of at least one felony, specifically, Insurance Fraud or Theft by Deception.

Statute Description (include the name of statute or ordinance): CRMINAL USE OF COMMUNICATION FACILITIES

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Date Filed:

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IF-2108-0229

Defendant Name:

First:

ASHLEY

Middle:

ESTHEL

Last: LATIMER

2. I ask that a warrant o 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 1 through 6.
- 5. 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 that 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.)

BER 30, 2018

(Date)

(Year)

AND NOW, on this date

I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before

nt can be issued.

(Issuing Authority)

(Magisterial District Court Number)

SEAL



Docket Number:

Date Filed:

OTN/LiveScan Number

Complaint/Incident Number

IF-2108-0229

Defendant Name:

First:

ASHLEY

Middle: ESTHEL Last:

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant is John A. Trevisan Jr., a Special Agent employed by the Pennsylvania Office of Attorney General (OAG); Bureau of Criminal Investigations (BCI), Insurance Fraud Section. Your Affiant has over twenty years of law enforcement /criminal investigation experience, and is sworn according to law deposes, and says:
- B. The OAG received an Iusurance Fraud Referral from Progressive Insurance Company ("Progressive"), Special Investigator Jason Truitte. Jason Truitte alleged that Ashley E. Latimer, DOB 06/20/1988, 166 West Champlost Street, Philadelphia, PA 19131 committed insurance fraud and attempted theft. Latimer is alleged to have filed a vandalism claim with Progressive in connection with damage to an auto which occurred before Latimer added comprehensive and collision coverage to her existing Progressive insurance policy. It was later determined that the claim value for the vandalism would have been in excess of \$2000.00 in property damage to the vandalized vehicle. The following facts will show that Latimer has committed the offenses of Insurance Fraud, Criminal Attempt Theft by Deception, and Criminal Use of a Communication Facility.
- C. In connection with this investigation, your Affiant reviewed the Progressive Insurance Company claim file notes and recorded statements. Your Affiant also interviewed Progressive Special Investigator Jason Truitte concerning the claim file. Based on the review of the file and the interview with Jason Truitte, your Affiant learned the following:
 - 1. On 08/18/2018, Latimer called Progressive and inquired about adding comprehensive and collision coverage to her existing policy and said that she would call again. Two days later, on 08/20/2018, Latimer called Progressive and added comprehensive and collision coverage to her existing Progressive automobile policy, (#922992585).
 - 2. On 08/22/2018, Latimer filed a vandalism report with the Philadelphia Police Department. Latimer told the Philadelphia Police that her 2018 Mercedes GLA 250 was vandalized sometime during the overnight hours between 08/21/2018 or on the morning of 08/22/2018. Latimer told police that the door to her fuel tank was ripped off and that chocolate syrup was poured in the gas filler line.
 - 3. On 08/24/2018, Latimer filed a claim with Progressive for the vandalism to her 2018 Mercedes. On this same day, at approximately 3:04 p.m., Progressive claims adjuster Dana Gray, whose office is located at 5165 Campus Drive, Suite 100 Plymouth Meeting, PA 19462, spoke with Latimer regarding her claim. The interview was recorded after Ashley E. Latimer gave her permission to have the interview recorded. Latimer stated that at approximately 6:00 a.m. on 08/24/2018, she came out of her residence located at 166 West Champlost Street Philadelphia, PA. Latimer observed her 2018 Mercedes was vandalized. Ashley Latimer told Progressive the vandalism happened on 08/23/2018, or on the early morning of 08/24/2018. Latimer stated that the gas tank door was broken and chocolate was in the gas filler line. Moreover, Latimer told Progressive that her vehicle was just towed today to Mercedes-Benz of Fort Washington for a repair estimate, and she could not go to work today (Your Affiant noted that Latimer told Progressive that the vandalism claim happen on 08/23/2018, or on the early morning hours of 08/24/2018, but told the police different dates).
 - 4. On 08/24/2018, Dana Gray contacted Frank Regalis of Mercedes-Benz of Fort Washington (MBFW). Regalis told Gray that Latimer's 2018 Mercedes-Benz was towed into their facility on 08/17/2018 through Mercedes Roadside Assistance for the fuel filler door being ripped off and chocolate inside the filler neck. Gray obtained a copy of the work order from MBFW. Gray said the work order identified Ashley Latimer as the customer, the make and model of the vehicle as a 2018 Mercedes-Benz, bearing vehicle identification number WDCTG4GB2JJ427239, and the towed



Docket Number:

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Defendant Name:

First:

Middle:

Last:

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date was 08/17/2018, with a description by the customer of "chocolate shove in the filler neck." Gray stated that the work order included a repair estimate of \$6,200.00. On 08/30/2018, Progressive denied the claim.

- D. On 10/05/2018, your Affiant contacted Frank Regalis, Assistant Service Manager of Mercedes-Benz of Fort Washington. Regalis verified Latimer's 2018 Mercedes bearing vehicle identification number WDCTG4GB2JJ427239 was towed into their facility on 08/17/2018. This tow was requested by Ashley Latimer for an estimate on damages from the gas fuel door cover being ripped off and chocolate shoved down the gas filler pipe.
- E. On 10/10/18, Your Affiant received a copy of the vandalism report that Latimer had filed with the Philadelphia Police Department. In this report, Latimer stated that the vandalism of her 2018 Mercedes Benz had occurred between 08/21/18 and 08/22/18. The Philadelphia Police Department report number was 18-35-71232. On this same day, your Affiant spoke with Philadelphia Police Officer Jason Belciano, who had taken the vandalism report from Latimer. Officer Belciano remembered this incident. Officer Belciano confirmed the information in his report. He stated that he had been dispatched to Latimer's residence to take this report on 08/22/2018. Officer Belciano had spoken with Latimer, who had told him that the vandalism to her 2018 Mercedes had occurred sometime during the overnight hours of 08/21/18 or on the morning of 08/22/18.
- F. Your affiant interviewed Ashley Latimer on 10/16/2018. Latimer admitted that the damaged to her vehicle occurred on 08/17/2018. Latimer adjusted that she added comprehensive and collision coverage to her existing policy after the vandalism had occurred. Also, Latimer admitted that on 08/24/2018, she filed a vandalism claim with Progressive Insurance for damages to her 2018 Mercedes Benz. Though Latimer denies telling Progressive claim adjuster Dana Gary that the damage to her car occurred on 08/23/2018, or on the early morning of 08/24/2018, Latimer's recorded statement indicates that she did tell claims adjuster Gary twice that the incident occurred on "08/23/2018, or on the early morning of 08/24/2018."
- G. Based on the above affidavit, your Affiant concludes probable cause exists to conclude Ashley Latimer committed the following crimes:

18 Pa C.S.A. §4117 (a) (2)

Insurance Fraud (F3)

18 Pa C.S.A. §901 / §3922 (a) (1)

Criminal Attempt / Theft by Deception (F3)

18 Pa C.S.A. §7512 (a)

Criminal Use of Communication Facility (F3)

Docket Number:

Date Filed:

OTN/LiveScan Number

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IF-2108-0229

Defendant Name:

First:

ASHLEY

Middle:

ESTHEL

Last:

LATIMER

I, SPECIAL AGENT JOHN A. TREVISAN JR., BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY T EF RE OING 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this

1),

Date Laforat June

, Magisterial District Judge

(Signature of Affiant)

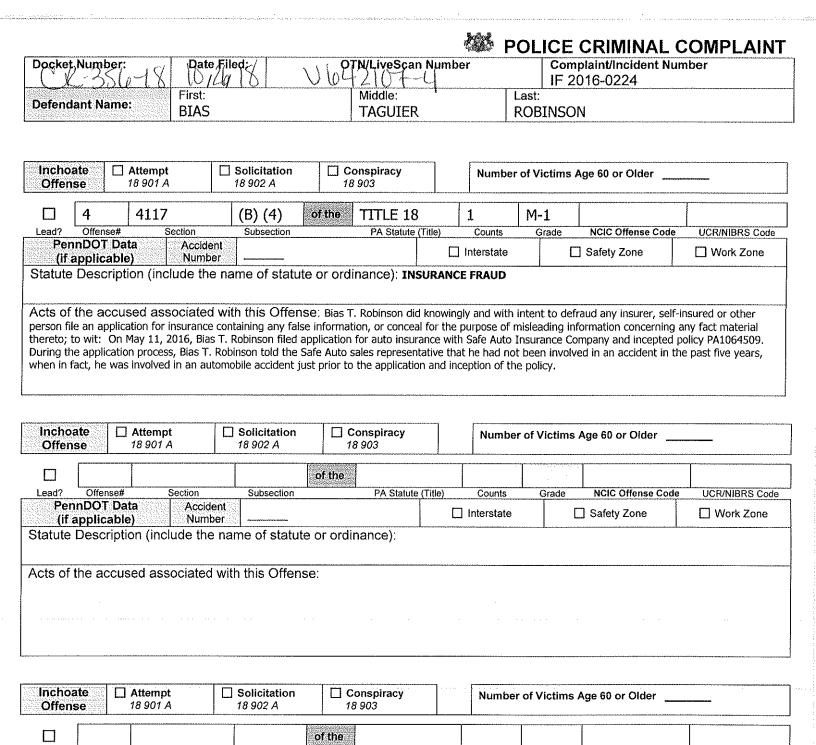
My commission expires first Monday of January,

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: BUCKS **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 07-1-08 VS. MDJ: Hon. John J. Kelly, Jr. (NAME and ADDRESS): 2661 Trenton Road BIAS **TAGUIER ROBINSON** Address: First Name Middle Name Last Name Gan Levittown, PA 19056 LKA: 292 Pinewood Dr. Levittown, PA 19054 Telephone: (215)946-5450 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. D-Misdemeanor No Extradition □ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Date Filed, OTN/LiveScan Number Complaint/Incident Number Request Lab Services? Dooket Number 🗋 YES 🛛 NO IF 2016-0224 **GENDER** ров 08/20/1990 Co-Defendant(s) POB Add'I DOB Male Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE ☐ White Black ☐ Asian Native American Unknown **ETHNICITY** Hispanic ☐ Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLU (Blue) GRY (Gray) BLK (Black) BRO (Brown) GRN (Green) Eye PNK (Pink) HAZ (Hazel) MAR (Maroon) Color XXX (Unknown) MUL (Multicolored) DNA □ NO **DNA Location** ☐ YES WEIGHT (lbs.) FBI Number **MNU Number** 180 ☐ YES ☐ NO Defendant Fingerprinted Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth. NCIC Veh. Code Reg. mat Ind. Plate # KBK-6231 PA same as Sticker (MM/YY) Def. Year Make Model Style Color \boxtimes 2MELM75WSTX629548 1996 Mercury Marquis Ls Blue 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). <u>O RY 2018</u> SDAG LINDA MONTAG (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) S/A ANTHONY AMMATURO <u>OAG BADGE</u> #429 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 of (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. ☑ I accuse the above hamed 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 [213] 1249 Woodbourne Rd., Levittown, (Subdivision Code) (Place-Political Subdivision) Pa & 3000 Ford Rd., Bristol, Pa in BUCKS County [09] on or about 5/11/2016 & 10/11/2016 THRU 10/20/2016 (County Code)

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Docket Number:	Date Filed:	OTN/LiveScan	Number		plaint/Incident N 016-0224	umber	
Defendant Name:	First: BIAS	Middle: TAGUIER		Last: ROBINSOI			
		IAGOLLK		KODIIAZOI	<u> </u>		
The acts committed by the When there is more than (Set forth a brief summary of without more, is not sufficient The age of the victim at the tiple listed. If the identity of an a	n one offense, each off the facts sufficient to advise t. In a summary case, you mu ne of the offense may be inc	ense should be num the defendant of the natu ust cite the specific section luded if known. In addition	bered chronolo ure of the offense(s on(s) and subsection, social security n	gically.) charged. A con(s) of the standard	citation to the statut atute(s) or ordinanc financial information	e(s) allegedly violated, e(s) allegedly violated.	
Inchoate	Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims Age 60 or	Older <u>0</u>	
⊠ 1 4117	(A) (2)	of the TITLE 18	1	F-3			
Lead? Offense Sec	19405	PA Statute (Ti	itle) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	ccident Number		☐ Interstate		Safety Zone	☐ Work Zone	
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD							
fact or thing material to the claim, to wit: On May 11, 2016, Bias Robinson, purchased a Safe Auto personal automobile policy for his 1996 Mercury, VIN 2MELM75W8TX62954B, after having already been involved in an automobile accident. Then on October 11, 2016 and October 20, 2016 Robinson used the claim number assigned to the accident from May 11, 2016, Safe Auto Claim number 6000145649, after the claim had already been denied, in order to receive payment for treatement of personal injuries alleged to have occurred from the accident, when in fact, the accident happened prior to the inception of the policy. Inchoate Attempt Solicitation Conspiracy Number of Victims Age 60 or Older Mumber of Victims Age 60 or Older 18 901 A 18 902 A 18 903							
[1000000000000000000000000000000000000				·····			
☐ 2 7512 Lead? Offense# Sect	1 (3 (-)	of the TITLE 18	1 (2)	F-3	NCIC Offense	HODAUDDO O - II-	
PennDOT Data		PA Statute (Ti		Grade	Code	UCR/NIBRS Code	
(if applicable)	Secretaria I I Interetata I I I Sataty Zono I I I Viloriz Zono						
Acts of the accused associated with this Offense: Bias T. Robinson did use a communication facility to commit, cause, or facilitate the commission, or the attempt thereof any crime which constitutes a felony under this title, to wit: Bias T. Robinson used a cell phone on May 11, 2016, to incept a personal automobile insurance policy with Safe Auto Insurance, and during the inception process did make two false statements to the Safe Auto Insurance representative, all in an attempt to facilitate the commission of Insurance Fraud, a felony of the third degree.							
Inchoate ☑ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 Number of Victims Age 60 or Older							
☐ 3 3922 Lead? Offense# Se	(A) (1) subsection	of the TTTLE 18 PA Statute (T	1 Counts	F-3	NCIC Offense Cod	A HCBANDBO Code	
PennDOT Data	Accident	PA Statute (1)	itle) Counts Interstate	Grade	Safety Zone	e UCR/NIBRS Code Work Zone	
		or ordinance): CRIM :	INAL ATTEMPT/1	THEFT BY DI	CEPTION		
Deception, he did an act that co automobile policy after having a coverage at the time, on Octob	Statute Description (include the name of statute or ordinance): CRIMINAL ATTEMPT/THEFT BY DECEPTION Acts of the accused associated with this Offense: Bias T. Robinson, committed an attempt when, with intent to commit the crime of Theft by Deception, he did an act that constituted a substantial step toward the commission of that crime, to wit: Bias T. Robinson, purchased a Safe Auto personal automobile policy after having already been involved in an automobile accident. After the Safe Auto claim for the accident had been denied for lack of coverage at the time, on October 11, 2016 through October 20, 2016, Bias T. Robinson presented the denied claim number in order to receive coverage for treatment of personal injuries alleged to have occurred from the accident in excess of \$3,000.00.						

Page 2 of 4



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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	nDOT Data applicable)	Accident Number			☐ Interstate] Safety Zone	☐ Work Zone
Statute	Description (include the nam	ie of statute or ordina	nce).				
Otatato	Description (molade the han	ic or statute or ordina	anoc).				
Acts of t	the accused a	associated with	this Offense:					

POLICE CRIMINAL COMPLAIN	kik.	POLICE	CRIMINAL	COMPL	AINT
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	First:	Middle:	Last:
Defendant Name:	BIAS	TAGUIER	ROBINSON

G. On September 28, 2018, Affiant conducted an interview of Ms. Sharon Haldis. Ms. Haldis is the office manager of Advanced Diagnostics. Ms. Haldis was able to confirm that Bias Robinson received a MRI on October 17, 2016. The MRI was completed based on a referral from Sangwoo Hwang, DC, of Precision Health and Wellness Centers. The MRI was requested as part of medical treatment for injuries Robinson stated occurred as a result of a motor vehicle accident on May 11, 2016. Ms. Haldis was able to confirm that two Health Insurance Claim Forms were presented to Safe Auto Insurance for payment of Bias Robinson's MRI. The first form was dated 10/20/2016 and the Insured's ID Number used was PA01064509A-00. That number was the Safe Auto Insurance policy purchased by Bias Robinson on May 11, 2016 at the scene of the motor vehicle accident. The second form was a resubmittal to Safe Auto Insurance for the same MRI, and was dated 12/20/2016. The Insured's ID Number used on the resubmittal form was 6000145649, which was the claim number issued by Safe Auto Insurance for the accident that occurred on May 11, 2016. Ms. Haldis stated that both of the Health Insurance Claim Forms were authorized for payment by Bias Robinson in Block 12 of the form. Block 12 indicated that Bias Robinson's signature is on file as the patient. Bias Robinson authorized the use of his signature in his initial patient packet with Advanced Diagnostics; specifically in the "Patient Authorization, Acknowledgement and Assignment For Insurance Assignment," document. The cost of the MRI is listed as \$2,000.00 on both forms.

- H. Based on the detailed information contained in this criminal complaint, Your Affiant requests a warrant of arrest be issued for Bias T. Robinson for the applicable violations of the Pennsylvania Crimes Code listed below:
 - 1. Title 18 PA C.S.A. 4117 (A) (2) Insurance Fraud (F-3).
 - 2. Title 18 PA C.S.A. 7512 (A) Criminal Use of Communication Facility (F-3).
 - 3. Title 18 PA C.S.A. 3922 (A) (1) Criminal Attempt/Theft by Deception (F-3).
 - 4. Title 81 PA C.S.A. 4117 (B) (4) Insurance Fraud (M-1).

I, S/A ANTHONY AMMATURO, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

AOPC 412A - Rev. 7/18

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			POLICE CRIMINAL COMPLAINT			
Docket Number:	Date Filed: O	TN/LiveScan Number	Complaint/Incident Number IF 2016-0224			
Defendant Name:	First: BIAS	Middle: TAGUIER	Last: ROBINSON			
made. 3. I verify that the fabelief. This verificato unsworn falsificato. 4. This complaint co. 5. I certify that this fi	cts set forth in this complaint a cation is made subject to the postion to authorities. Insists of the preceding page(subjection to authorities) Ing complies with the provision to a confident that require filing confident	re true and correct to the benalties of Section 4904 of numbered <u>1</u> through In sof the Case Records Pu	eant be required to answer the charges I have best of my knowledge or information and the Crimes Code (18 Pa.C.S. § 4904) relating ablic Access Policy of the Unified Judicial aments differently that non-confidential			

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

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.

(Signature of Affiant) (Year) (Date) AND NOW, on this date 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.

(Magisterial District Court Number)

Docket Number:	Pate Filed: </th <th>√ QTŅ/LiveŞcan Ņumber</th> <th>Complaint/Incident Number</th>	√ QTŅ/LiveŞcan Ņumber	Complaint/Incident Number
CK-221-18	10/24/0	<u> </u>	IF 2016-0224
5.6 1.4 1.1	First:	Middle:	Last:
Defendant Name:	BIAS	TAGUIER	ROBINSON

AFFIDAVIT of PROBABLE CAUSE

- A. Your affiant is Anthony Ammaturo, Special Agent with the Pennsylvania Office of Attorney General (OAG), Bureau of Criminal Investigation (BCI), Insurance Fraud Section. Your affiant has over 30 years of law enforcement/criminal investigative experience and being duly sworn according to law deposes and says:
- B. The OAG received an Insurance Fraud Referral from Safe Auto Insurance Company, Special Investigator Mr. Carey S. Latsha. Safe Auto Insurance alleged that Bias T. Robinson, DOB August 20, 1990, 3000 Ford Rd., F-48, Bristol, PA 19007, committed insurance fraud and attempted theft. Bias T. Robinson is alleged to have purchased a Safe Auto personal automobile insurance policy for an accident which occurred before the inception of that policy. In addition, Bias T. Robinson is alleged to have submitted documentation for payment of medical treatments related to the claim associated with the accident completed at Precision Health & Wellness Center, 1249A Woodbourne Rd., Levittown, PA and a MRI was conducted by Advanced Diagnostics at 3160 Tremont Ave, Trevose, PA 19053. The following facts will show that Bias T. Robinson has committed the offenses of Insurance Fraud, Criminal Attempt Theft by Deception, and Criminal Use of a Communication Facility.
- C. In connection with this investigation, Your Affiant reviewed Safe Auto Insurance Company claim file notes, and recorded statements. Your Affiant also interviewed Safe Auto Insurance Company Special Investigator Troy Hayes, in detail concerning the claim file. Based on the review of the claim file and the interview with Mr. Hayes, Your Affiant ascertained the following:
 - 1. On March 12, 2016, Bias T. Robinson's Safe Auto personal automobile policy, policy number PAQ1052834A-00 was cancelled by Safe Auto Insurance.
 - 2. On May 11, 2016, at 7:59 am, Eastern Standard Time, Bias T. Robinson contacted Safe Auto Insurance by phone, and stated he wanted to, "Do my policy over." Mr. Robinson was issued a new Safe Auto Insurance personal automobile policy, policy number PA01064509A-00. The new policy incepted at 8:11 am, Eastern Standard Time, and contained his address at 3000 Ford Rd., F-48, Bristol, PA 19007 when Robinson made an initial payment of \$185.00 using a MasterCard, with the last four digits of 6582. During the application for a new policy, Mr. Robinson was asked by the Safe Auto representative, "Have you been involved in any accidents in the past five years?" Mr. Robinson responded, "No." The Safe Auto representative also asked Mr. Robinson, "Have you received any tickets in the past three years?" Mr. Robinson responded, "No." Mr. Robinson also stated that he wanted the new policy faxed to him at (215)440-7950. This information is contained in a recorded conversation between Mr. Robinson and the Safe Auto representative.
 - 3. On May 11, 2016, at 9:07 am, Eastern Standard Time, Bias T. Robinson contacted Safe Auto Insurance by phone again, and stated, "I just paid for some insurance, and I found a cheaper rate so I wanted to know about how to get my money back. I just paid for it this morning." Mr. Robinson was advised by the Safe Auto representative that since he had already been faxed proof of insurance, there was going to be a \$25.00 cancellation fee, as well as back charges on his previous automobile policy of \$54.00. Mr. Robinson stated he wanted the \$25.00 cancellation fee waived because he had just done the policy, and to cancel the policy. At that time, the Safe Auto representative cancelled the new policy, policy number PA1064509. All of this information is contained in a recorded conversation between Mr. Robinson and the Safe Auto representative.



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Defendant Name:	BIAS	TAGUIER	ROBINSON

- 4. On May 25, 2016, at 1:48 pm, Eastern Standard Time, Mr. Amir Mashaqbeh contacted Safe Auto Insurance, and stated that he wanted to file a claim for an accident he was involved in on May 11, 2016, at 7:50 am, Eastern Standard Time. Mr. Mashaqbeh stated that the other driver involved in the accident was Bias Robinson, and that his Safe Auto automobile policy number was PAQ1052834A-00. Initially, the Safe Auto representative stated that was not a valid Safe Auto Insurance policy, but after repeated attempts by Mr. Mashaqbeh stating the policy number, the Safe Auto representative indicated she located the policy. Mr. Mashaqbeh again stated the accident happened on May 11th, 2016, at 7:50 in the morning. Mr. Mashaqbeh also stated that the Pennsylvania State Police responded to the scene of the accident, and completed an accident report. That report number was PA2016-190262, which is where Mr. Mashaqbeh got the information for Bias Robinson, and the Safe Auto policy number. At that time, the Safe Auto Insurance representative issued Safe Auto Insurance claim number 6000145649 for the accident. All of this information is documented in a recorded conversation between Mr. Mashaqbeh and the Safe Auto representative.
- 5. Mr. Troy Hayes confirmed that the accident Mr. Mashaqbeh reported involved Mr. Bias Robinson. Mr. Robinson was operating his 1996 Mercury when he struck Mr. Mashaqbeh's 2005 Ford, F650 Super Duty truck. He also stated the accident occurred on Interstate I-95. Mr. Hayes indicated that Mr. Robinson used his old, cancelled Safe Auto Insurance policy number of PA1052834 on the PSP accident report.
- 6. On May 31, 2016, Safe Auto Insurance sent denial letters on claim number 6000145649 to both the alleged insured, Bias Robinson, and the claimant, Amir Mashaqbeh. The denial of the claim was based on the fact coverage was unavailable, as the subject policy was not in force at the time of the loss, 5/11/2016.
- 7. Mr. Troy Hayes indicated that on October 17, 2016, Safe Auto Insurance received documentation from the law firm of Simon & Simon, 1515 Market St., Philadelphia, PA 19102 stating that they were representing Mr. Bias Robinson in Safe Auto claim number 6000145649. Mr. Hayes stated that Simon & Simon was sent a denial letter on the claim, and there was no further correspondence from the law firm.
- 8. On October 27, 2016, Safe Auto Insurance received a Health Insurance Claim Form for a MRI that Bias Robinson received on 10/17/2016. The MRI was conducted by Advanced Diagnostics at 3160 Tremont Ave, Trevose, PA 19053 at the requested referral of Sangwoo Hwang, DC. The MRI was done in support of the alleged injuries Robinson sustained in the motor vehicle accident dated May 11, 2016. The total charge for the treatment was \$2000.00. The form indicated that the insured's identification number was PA01064509A-00 which was the Safe Auto Policy number that Bias Robinson purchased on May 11, 2016, at 8:11 am, Eastern Standard Time, and subsequently cancelled on May 11, 2016, at 9:07 am, Eastern Standard Time. This form indicated that Bias Robinson's signature was on file.
- 9. On November 2, 2016, Safe Auto Insurance received two separate Health Insurance Claim Forms. The claim forms were for medical treatments that Bias T. Robinson stated he received as a result of the accident on May 11, 2016. Those forms indicated that Robinson received treatment for his injuries by Sangwoo Hwang, DC, at Precision Health & Wellness Center, 1249A Woodbourne Rd., Levittown, PA 19057. The dates of the treatment were between 10/11/2016 & 10/20/2016. The total charge for the treatments was \$1080.00. The forms indicated that the insured's identification number was 6000145649, which is also the Safe Auto claim number assigned to the accident on May 11, 2016. In addition, the forms indicated that Bias Robinson's signature was on file.

Page $\angle 2$ of $\angle 6$



Docket Number:	1636314 1 11	TN/LiveScan Number	Complaint/Incident Number IF 2016-0224
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Defendant Name:	BIAS	TAGUIER	ROBINSON

- 10. On December 30, 2016, Safe Auto Insurance received a duplicate Health Insurance Claim Form from Advanced Diagnostics for the same MRI conducted on 10/17/2016 on patient Bias Robinson. This time the claim form contained the insurance claim number 6000145649 as Mr. Robinson's identification number, this was the Safe Auto Insurance claim number issued for the accident that occurred on May 11, 2016. The first time this form was submitted for services rendered on 10/17/2016, it contained the Safe Auto policy number PA01064509A-00.
- D. On September 19, 2018, Affiant conducted an interview of Mr. H. Kim, DC, the managing partner of Precision Health and Wellness Centers. Mr. Kim confirmed that Bias Robinson, DOB 08/20/1990, received treatments at the medical practice between the dates of October 11, 2016 & October 20, 2016. Mr. Kim stated that Bias Robinson was being treated for injuries Robinson stated he received as a result of a car accident back on May 11, 2016. Mr. Kim stated that as a result of those treatments, Precision Health and Wellness billed Safe Auto Insurance using Safe Auto claim number 6000145649 as Robinson's Insured I.D. Number. Mr. Kim also stated that Bias Robinson authorized those payments with a "Signature on File", and dated the form 10/26/16. The dollar amount for those treatments was \$1,080.00. Mr. David Lee, the office manager of Precision Health and Wellness Centers, provided a copy of Bias Robinson's "Patient Basic Information Packet." The packet contained an initial evaluation form indicating how the injury occurred, and patient information regarding billing procedures. Bias Robinson's signature appears at least three times on this packet of information.
- E. On September 24, 2018, Affiant conducted an interview of Pennsylvania State Trooper W. Lawver, #12952. PSP Trooper Lawver stated that on May 11, 2016, he was employed by the Pennsylvania State Police as a Trooper working out of Troop K located in Philadelphia, PA. I showed Trooper Lawver a copy of Commonwealth of Pennsylvania Police Crash Report, Case Number 2016-190262. Trooper Lawver stated that he completed that report for an accident that occurred on May 11, 2016 at 0750 hours. The accident occurred on Interstate 95, southbound at mile marker 30.7. Trooper Lawver indicated that Bias Robinson was the operator/owner of Unit #1 involved in the accident, and Mashaqbeh, Amir, N., was the operator of Unit #2. Trooper Lawver stated that the information for Unit #1 was supplied by Bias Robinson, as well as Amir Mashaqbeh suppling the information for Unit #2. Bias Robinson provided Trooper Lawver with Safe Auto Insurance policy number PAQ1052834A-00, his canceled policy number. Amir Mashaqbeh provided Trooper Lawver with Progressive Insurance policy number 0355837.
- F. On September 26, 2018, Affiant conducted an interview of Mr. Amir Mashaqbeh. Mr. Mashaqbeh stated that he was involved in a motor vehicle accident on March 11, 2016, and the accident occurred on Interstate 95. Mr. Mashaqbeh stated he could not remember the name of the other driver involved, but he was able to state that the other driver was operating a 1995 or 1996 Mercury, Grand Marquis. Mr. Mashaqbeh stated that the Pennsylvania State Police did respond to the scene of the accident, and completed an accident report. Amir Mashaqbeh stated that he used the information contained on this accident report to contact the insurance company of the other driver involved, which was Safe Auto Insurance. When he contacted Safe Auto Insurance, they issued Mr. Mashaqbeh a claim number for the accident. He stated that after filing the claim with Safe Auto Insurance, he was later advised that there was no Safe Auto Insurance coverage for the accident. Mr. Mashaqbeh stated that Safe Auto Insurance informed him that the other driver purchased the insurance policy with Safe Auto after the accident occurred.

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Docket Number: 10/	↓ Date Filed:// ¸ Ο	TN/LiveScan Number	Complaint/Incident Number
(1)C-0600-18	10/20/18	1042107-4	IF 2016-0224
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Defendant Name:	BIAS	TAGUIER	ROBINSON

My commission expires first Monday of January, 2024

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: CHESTER

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA

MDJ: Hon. ANALISA SONDERGAARD Address: 950 West Valley Road	DEFENDANT: CHARLES	(NAME an	d ADDRESS): BRUTUS
	First Name	Middle Name	Last Name Gen
Suite 3100 Wayne, PA 19087	309 PLYMOUTH ROM		
elephone: (610)971-168 5	ICIC Extradition Code Type		
☐ 1-Felony Full ☐ 5-Felony Pending Extraction ☐ 6-Felony Pending Extraction ☐ 6-Felony Pending Extraction ☐ A-Misdemeanor Full	radition	emeanor Surrounding State emeanor No Extradition emeanor Pending Extraditi	on
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JOCKEL MULLIPET		IF2018-0072	☐ YES ☑ NO
	0115-0	dd'I DOB / /	Co-Defendant(s)
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Office of the attorney for the Commonwealth App			
(The attorney for the Commonwealth may require that the compla filing. See Pa.R.Crim.P. 507).	int, arrest warrant affidavit, or	both be approved by the at	torney for the Commonwealth prior to
SDAG ROBERT LABAR	1011		101161 18
(Name of the attorney for the Commonwealth)	(Signature of the atterney for the	Commonwealth)	(Date)
		1200E BADCE #E	11
I, SPECIAL AGENT JOSEPH PAOLANTONIO (Name of the Affiant)	A1-/		ffiant ID Number & Badge #
of Pennsylvania Office of Attorney Gene (Identify Department or Agency Represented and Political Subdo hereby state: (check appropriate box)	ral (Fodivision)	PA0222400 Police Agency ORI Number	2018
 I accuse the above named defendant who live 	es at the address set for	h above	333
□ I accuse the defendant whose name is unknown.	own to me but who is des	cribed as	
☐ I accuse the detendant whose name is driking	WIT TO THE DUL WHO IS ACC		ON
☐ I accuse the defendant whose name and pop therefore designated as John Doe or Jane Do with violating the penal laws of the Commonwe 19355	e calth of Donneylyania at		me and whom I have

on or about 8/10/17 THROUGH 2/13/18

in CHESTER County

[15]

(County Code)

Docket Number:	Date	Filed:	OTI	N/LiveScan Num		Comp	olaint/Incident Nu	
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When there is mo (Set forth a <i>brief</i> sumr	re than one of nary of the facts ufficient. In a sun	ffense, each o sufficient to advis nmary case, you r	ttense shows the street of the	dant of the nature of specific section(s)	f the offense(s and subsections ocial security	ogically. s) charged. A con(s) of the standard	citation to the statut atute(s) or ordinanc inancial information	ted, if appropriate. e(s) allegedly violated, e(s) allegedly violated. n (e.g. PINs) should not
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(if applicable) Statute Description	on (include the	name of statu	te or ordi	nance): INSURA	NCE FRAUD			
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Statute Description	on (include the	e name of stat	ute or ord	inance): CRIMIN	IAL ATTEMP	T/THEFT BY	DECEPTION	
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POLICE CRIMINAL COMPLAINT Complaint/Incident Number OTN/LiveScan Number Date Filed: **Docket Number:** IF2018-0072 Last: Middle: First: **BRUTUS** Defendant Name: **CHARLES** Number of Victims Age 60 or Older _ ☐ Conspiracy ☐ Solicitation ☐ Attempt Inchoate 18 903 18 902 A 18 901 A Offense F-3 TITLE 18 1 of the (a) 4 7512 UCR/NIBRS Code NCIC Offense Code Grade PA Statute (Title) Counts Subsection Section Lead? Offense# ☐ Work Zone ☐ Safety Zone ☐ Interstate PennDOT Data Accident (if applicable) Number Statute Description (include the name of statute or ordinance): CRIMINAL USE OF A COMMUNICATION FACILITY Acts of the accused associated with this Offense: The defendant did use a communication facility to commit, cause or facilitate the commission or attempt thereof of any crime which constitutes a felony under this Title 18; to wit: defendant used a telephone/cell phone to file a fraudulent claim with Allstate Insurance Company, and made false statements regarding the oil deliveries and maintaining heat at his residence at the time of loss. Number of Victims Age 60 or Older _ ☐ Conspiracy ☐ Solicitation Inchoate ☐ Attempt 18 903 18 902 A 18 901 A Offense of the П UCR/NIBRS Code NCIC Offense Code PA Statute (Title) Counts Grade Subsection Section Lead? Offense# ☐ Work Zone Accident ☐ Safety Zone PennDOT Data ☐ Interstate Number (if applicable) Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense: Number of Victims Age 60 or Older ☐ Solicitation ☐ Conspiracy ☐ Attempt Inchoate 18 903 18 902 A 18 901 A Offense of the

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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	1		
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Statute I	Description	(include the nar	me of statute or o	rdinance):				
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Acts of t	he accused	associated with	n this Offense:					

UCR/NIBRS Code

NCIC Offense Code

			. •
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF2018-0072
Defendant Name:	First: CHARLES	Middle:	Last: BRUTUS

- 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 $\underline{\hspace{1cm}}$.
- 5. 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 that 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.)

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(Date) /0/22/	(Year) 2018	(Signature of Affiant)	
AND NOW, on this date	I certify that the co	omplaint has been properly completed and v	verified.
An affidavit of probable cause must be com 15-4-01 (Magisterial District Court Number)	(Issuing Authority)	SEAL	

		Joseph L.	OLIOL OI MINI II I
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF2018-0072
Defendant Name:	First: CHARLES	Middle:	Last: BRUTUS

AFFIDAVIT of PROBABLE CAUSE

- Your Affiant, Special Agent Joseph Paolantonio, Insurance Fraud Section, Pennsylvania Office of Attorney General, being duly sworn according to law, deposes and says:
- 2) Your Affiant was assigned to investigate an allegation of Insurance Fraud regarding false and misleading information provided to Allstate Insurance Company ("Allstate") by Charles Brutus, DOB: 6/3/74, 309 Plymouth Rd., Wilmington, DE 19803, pertaining to an insurance claim. Allstate is an insurance company doing business in Pennsylvania.
- 3) In connection with you Affiant's investigation of this referral, your Affiant interviewed Michael Chesterman, Allstate Insurance Special Investigations Unit ("SIU"), reviewed documents, listened to recorded statement, other evidentiary material regarding claim #0470110222, and conducted an interview with Charles Brutus. Based on all the information obtained, your Affiant learned that:
 - a) On 8/31/16, Charles Brutus obtained Allstate Insurance homeowner policy #00092808017 to insure the property and dwelling located at 248 Indiana Ave., Shenandoah, PA 17976. The inception date for the policy was 8/31/16.
 - b) On 8/10/17, Brutus contacted the Allstate Call Center to report the radiators at the residence are breaking down due to age, wear and tear, and malfunction. Brutus stated he started noticing leaks that he had to clean up. Brutus was looking into having several of the radiators replaced and was checking with Allstate to see if there was coverage. Brutus was assigned claim #0470110222.
 - c) On 8/10/17, Allstate reviewed the circumstances of the claim and denied coverage for the repair or replacement of the radiators, as the policy does not provide coverage for damage related to weather, age, mechanical failure or breakdown.
 - d) On 8/16/17, Brutus contacted the Allstate Call Center to claim water damage that was related to the leak from a radiator. Brutus advised the basement carpet was damaged, and there are water stains in the kitchen drop ceiling and wall paper. Brutus stated he lives at the property on weekends and reported the date of loss was 3/1/17. Allstate reopened claim # 0470110222, and scheduled to have an adjuster inspect the damage.
 - e) On 8/29/17, Caleb Bower, Adjuster, Allstate Insurance, 120 Atwater Drive, Malvern, PA 19355, conducted an inspection of the damage at 248 Indiana Ave., Shenandoah, PA 17976. The estimate to repair the damage was \$5,054.15, minus a \$500.00 deductible, for a total of \$4,554.15. Bower requested Brutus provide to Allstate the oil bills and power bills to verify that heat was maintained at the residence.
 - f) On 10/8/17, Brutus forwarded to Allstate copies of his electric bill payments from 5/3/16 through 9/5/17.
 - g) On 10/23/17, Caleb Bower reviewed the electric bills which Brutus which showed that power was maintained during the period of loss, and requested Brutus forward oil bill invoice to show usage at the address.

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Defendant Name:	First: CHARLES	Middle:	Last: BRUTUS

- h) On 1/12/18, Brutus contacted Allstate to get a status of his claim.
- i) On 1/19/18, Brutus contacted Sean Owens, Allstate Claim Representative, 120 Atwater Drive, Malvern, PA 19355, regarding the status of his claim. Brutus was advised Allstate was attempting to verify that heat was maintained at the residence in relation to the freeze of the plumbing. Brutus stated he gets the oil tank filled up every 3 months. To verify heat was maintained at the residence, Brutus sent an email to Allstate which contained a photo of Kosar Oil delivery invoice, dated 12/15/16, sale #23584, for 101.7 gallons of oil at \$3.5490 per gallon, for a cost of \$360.93. Brutus was requested to also forward an oil delivery invoice for the winter of 2017 for verification.
- j) On 1/29/18, Brutus sent an email to Allstate which contained a photo of Kosar Oil delivery receipt, dated 2/21/17, sale #25794, for 102.5 gallons of oil at \$3.5490 per gallon, for a cost of \$363.77. Sean Owens spoke to Brutus who stated the receipt relates to heating oil that was supplied to his property for the winter of 2017.
- k) On 2/12/18, Michael Chesterman, SIU, Allstate, 1200 Atwater Dr., Malvern, PA, 19025, contacted Marsha Kosar, co-owner, Kosar Oil, 400 Swatar Rd., Shenandoah, PA 17976, regarding the invoices supplied by Brutus to Allstate. Kosar stated that both documents were fabricated as follows:
 - 1. That oil price on 02/21/2017 was \$1.989 per gallon, and oil price on 12/15/2016 was \$1.969 per gallon.
 - 2. Kosar invoices do not have a line going through the zeros on their print.
 - 3. Kosar sold the insured oil in 2013.
 - 4. Kosar sales slips have to list Truck 1 or Truck 2 on the invoices. That is not listed on the invoices supplied by Brutus
 - 5. Kosar sales numbers on 12/15/2016 started at #36527. The Brutus invoice lists sale #23584.
 - 6. Charles Brutus has not ordered oil from Kosar in the last few years.
 - 7. Marsha Kosar pulled the sales number for the 02/21/2017 invoice provided by Brutus, and discovered it was a ticket for a completely different customer who receives oil through a state program.
 - 8. Charles Brutus did purchase oil on 03/06/2013 (ticket number 25790) and oil was \$3.599.
- l) On 2/12/18, Michael Chesterman, Allstate SIU, 1200 Atwater Dr., Malvern, PA, 19025, conducted a recorded statement from Charles Brutus. In summary, Brutus stated the alarm went off at his house, 248 Indiana Ave., Shenandoah, PA, while he was not home. A neighbor, Frank Brophy, who has keys to the house went inside the house to check and discovered water leaking from one of the pipes. Brutus confirmed the date of loss as 3/1/17, and he filed the claim on 8/10/17. Brutus stated he was a customer of Kosar Oil

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Defendant Name:	First: CHARLES	Middle:	Last: BRUTUS

during the time of the loss, Kosar delivered oil to his residence on 12/15/16 and 2/21/17, and left the invoices in his mailbox at the time of the deliveries. Brutus stated he would leave cash in an envelope with a neighbor to pay Kosar when he (Brutus) was not at home. Brutus confirmed the two Kosar Oil delivery invoices, dated 12/15/16 and 2/21/17, he forwarded to Allstate were authentic, and denied making or altering the invoices.

- m) On 2/12/18, Michael Chesterman, Allstate SIU, contacted Frank Brophy who stated Brutus had never given him an envelope with money to pay Kosar Oil upon delivery to Brutus' residence.
- n) On 2/13/18, Michael Chesterman contacted Charles Brutus and advised his claim has been denied based upon material misrepresentation relative to the loss facts. Brutus denied making the fraudulent invoices and stated he was provided the documents by someone doing work in his home.
- 4) Your Affiant conducted an interview with Marsha Kosar, Kosar Oil Company, who stated Brutus had not been a customer since 2013, and Kosar Oil had not made a delivery to his residence since that time. Marsha Kosar stated she reviewed the invoices supplied to Allstate by Charles Brutus, and they are fraudulent. Kosar stated the sales number and prices of oil are all incorrect for those dates, and the printing on Brutus' invoices are different then an authentic Kosar invoice.
- 5) You Affiant interviewed Charles Brutus who stated he did have Allstate policy #00092808017 to insure 248 Indiana Ave., Shenandoah, PA 17976. Brutus stated he filed claim # 0470110222 for a loss that occurred on 3/1/17. Brutus stated he lied to Allstate Insurance by saying Kosar Oil Company made deliveries to his residence during the time of the loss. Brutus stated someone else had made the Kosar Oil receipt for him, admitted the receipt was fraudulent, and he was aware of that fact when he forwarded it to Allstate.
- 6) Your Affiant notes Charles Brutus knowingly made false statements to Allstate Insurance over a telephone/cell phone and submitted two fraudulent Kosar Oil invoices to Allstate regarding claim #0470110222 in order to obtain benefits of \$4,554.15. Allstate homeowner policy state they do not cover loss in which any insured person has concealed or misrepresented any material fact or circumstance. Allstate does not cover loss at a residence caused by freezing unless the insured has used reasonable care to maintain heat in the building structure.
- 7) Based on the foregoing, your Affiant believes probable cause exists that Charles Brutus committed the following crimes in connection with his claim for benefits under his policy with Allstate Insurance Company:

18 Pa C.S.A. §4117 (a)(2) 18 Pa C.S.A. §4101 (a) 18 Pa C.S.A. §901/3922(a) Insurance Fraud (F-3)

Forgery (F-3)

Criminal Attempt/Theft By Deception (F-3)

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Defendant Name:	First: CHARLES	Middle:	Last: BRUTUS

18 Pa C.S.A. §7512(a)

Criminal Use of Communication Facility (F-3)

I, SPECIAL AGENT JOSEPH PAOLANTONIO, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

1	(Signature of Affiant)
Sworn to me and subscribed before me this day of	October 2018 , Magisterial District Judge
My commission expires first Monday of January, 2024	SEAL

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First: CHRISTEN	Middle: ELIZABETH	Last: ALI	
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- 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 1 through ___.
- 5. 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 that 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.)

(Date)	(Year)	_	(Signature of Affiant)	
AND NOW, on this date		I certify that the complaint ha	s been properly completed and v	erified.
An affidavit of probable cause must be	completed before a	warrant can be issued.		

Docket Number:	Date Filed:	OTN/LiveScan Number	С	omplaint/Incident Number
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	First:	Middle:	Last:	
Defendant Name:	CHRISTEN	ELIZABETH	ALI	

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant is Special Agent Paul Blash of the Insurance Fraud Section of the Pennsylvania Office of Attorney General. Your Affiant has thirty-two years of law enforcement/investigative experience. Your Affiant has participated in hundreds of investigations and arrests for violations of the Pennsylvania Crimes Code. Your Affiant, having been duly sworn according to law, deposes and says:
- B. The Pennsylvania Office of Attorney General received a referral from Jan Sherlock, Special Investigator for the Encompass Insurance Company. Encompass is a subsidiary of the Allstate Insurance Company. Sherlock alleged that a male subject identified as Asfand Ali, (a/k/a Ozzie Ali, DOB 02-16-1975), who resided at 69 North Danbury Circle East Fallowfield, PA, committed Insurance Fraud. Sherlock alleged that on 02/23/2018, Asfand Ali added a 2012 Mercedes Benz GL 550 to his existing Encompass Automobile Insurance Policy (#0281830383). On 04/02/2018, Ali submitted an accident claim to Encompass, reporting that he had parked his Mercedes, but left the transmission in neutral position, which caused the car to roll backwards into a wooded area, causing damage to the car. In connection with Ali's claim, his wife, Christen Ali, also told Allstate about the incident and described the same damage as having occurred as a result of the incident. Allstate's investigation found that the damage that both Asfand Ali and Christen Ali claimed to have resulted from this incident was present on the car before they bought it. As summarized below, your Affiant investigated Allstate's allegations and, as a result, confirmed that Asfand Ali and Christen Ali both made false statements to Encompass about the damage to the car in furtherance of Asfand Ali's claim and that, therefore, both Asfand Ali and Christen Ali had conspired to commit and did commit Insurance Fraud and related crimes.
- C. Your Affiant interviewed Jan Sherlock, Special Investigator for Encompass Insurance Company, reviewed the claim file, listened to audio recordings, and viewed photographs provided by Sherlock. As a result, your Affiant learned the following:
 - 1. On 02/22/2018, Asfand Ali purchased a 2012 Mercedes Benz GL 550 bearing vehicle identification number 4JGBF8GE2CA789964 and Pennsylvania registration KPK-2324 from Conshohocken Porsche Audi. On 02/23/2018,



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF 2018-0954
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Defendant Name:	CHRISTEN	FLTZABETH	ALT

Asfand Ali added the Mercedes to his existing Encompass automobile policy number 0281830383.

2. On Monday, 04/02/2018, Ali called Encompass via telephone to report a claim. The claim call was audio recorded and assigned claim number Z0333168. During that call, Ali claimed that he had an accident and that, as a result, his 2012 Mercedes incurred damage to the rear bumper, driver's side rear wheel well, and driver's door. When asked when this accident occurred, Ali replied, "Saturday." The Encompass representative then said "the 31st" (i.e., Saturday, 03/31/2018) and Ali agreed that that was the date. Ali described the accident to Encompass as follows:

Asfand Ali and his family were at Hibernia Park in Coatesville, PA. Ali parked the Mercedes and he and his family walked away from the car. However, because he accidently left it in neutral, the car rolled backwards, down a hill, and struck a rock and several trees, causing the claimed damage.

3. Jan Sherlock conducted a recorded interview of Asfand Ali on 04/20/2018. As he had reported in his initial claim call, Ali claimed that his car was damaged on 03/31/2018 and recounted the series of events provided in that initial claim call. Sherlock specifically asked Ali if there was any previous damage to his car before the present claim; Ali responded that there was only minor paint damage to the car and that it had no major body damage. Ali stated that he did not take any photographs of his car when he purchased it. Ali specifically explained that the front driver's door was damaged when he tried to get back into the car in an effort to stop the car as it was rolling backwards. Ali also told Sherlock that no pictures of the damage were taken at the park where the incident occurred, but that he would send her the photos that he took when he returned home after the accident. (Ali later sent to Sherlock photos showing the damage that he claimed.) After Ali reported that this incident occurred on 3/31/18, Sherlock told him that Encompass had learned that he brought his car to the Union Park Collision Center for a repair estimate on 03/20/2018 (i.e., eleven days before



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Defendant Name:	CHRISTEN	ELIZABETH	ALI

the reported date of loss of 03/31/2018). All responded that the damage occurred on 03/17/18 (i.e., two weeks earlier than he had initially reported) and that he was confused regarding the date of the accident. All called back later and said that, after speaking with his wife, he determined that the incident was 03/18/2018. (Sherlock has provided your Affiant with a copy of the Union Park Collision Center estimate, dated 03/20/18, which identified damages to, among other parts, the left rear bumper, left quarter panel and wheel-well, and the left driver's door of Ali's Mercedes. The estimated cost to repair was the car was \$2,799.20).

- 4. Christen Ali is the wife of Asfand Ali and co-policyholder on their Encompass automobile insurance policy. On 04/27/2018, Jan Sherlock interviewed Christen, via phone at her residence in East Fallowfield, PA about her husband's claim and the damage to the Mercedes. Christen stated that the accident occurred at Hibernia Park on 03/18/2018. Christen recounted how the car rolled downhill and caused damage to the driver's door and to the driver's side rear wheel well. Christen told Encompass that the driver's door was damaged when her husband opened the door in an attempt to get into the car while it was rolling down the hill. Christen also claimed that, as a result of this incident, there were scratches on the car. Christen told Sherlock that her husband photographed the damage to the car when they returned home after the accident. Sherlock specifically asked Christen if there was any previous damage to the Mercedes and she replied that there was no damage to the car, that she and her husband take great care of their cars, and that the Mercedes was in really good condition. Christen also stated that they buy all their cars in good condition.
- 5. Your Affiant notes that the "metadata" for the photographs that Asfand Ali provided to Sherlock in order to show the damage to the car indicates that the photographs were taken on 04/02/2018, i.e., 15 days after both Christen and Asfand said that Asfand took the photos. (In the context of digital photos, "metadata" is digitally stored information about the photo, including such information as the type of device that was used to take the photo, the date the photo was taken, the location



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Defendant Name:	CHRISTEN	ELIZABETH	ALI	

of the photo, the file size of the photo, etc. This information is stored within the digital photo file itself.)

- 6. On 05/07/2018, Jan Sherlock asked Asfand Ali to provide paperwork related to his purchase of the Mercedes and to all estimates for repairs since the date of purchase. Ali did not provide such paperwork and, instead, withdrew his claim on 05/10/2018.
- D. On 09/12/2018, your Affiant interviewed Jim Satterthwaite, General Manager for Conshohocken Porsche Audi. Satterthwaite provided the following information. On 02/23/2018, Conshohocken Porsche Audi sold a 2012 Mercedes Benz, bearing vehicle identification number 4JGBF8GE2CA789964, to Asfand Ali. The car was sold in "as is" condition, with damage to the rear bumper, driver's door, and driver's side rear wheel well. The Mercedes was previously owned by Tom McLaughlin, who resided at 142 South Washington Street, Wilkes Barre PA 18701.
- E. On 09/10/2018, your Affiant interviewed Tom McLaughlin at his business located in Wilkes Barre, PA. McLaughlin stated that he owned a 2012 Mercedes Benz GL550 bearing vehicle identification number, 4JGBF8GE2CA789964 which he traded in to Conshohocken Porsche Audi in December 2017. Your Affiant showed McLaughlin the photographs that Asfand Ali has sent to Encompass Insurance in order to support his claim of damage to his car and McLaughlin immediately identified all of the damage shown in the photographs as damage that was present on the car when he owned it and was still present when he traded the car in to Conshohocken Porsche Audi in December of 2017. McLaughlin explained that some of the damage was caused by an accident that occurred when his wife, Kathleen, was driving on 05/06/2014 and that there was additional damage caused in subsequent accidents before he traded in the car. One of the photos that your Affiant showed to McLaughlin depicted damage to the driver's side rear wheel-well damage and showed Asfand Ali holding a broken piece of side molding from that wheel well; McLaughlin specifically recalled that that piece of molding had been broken off in his wife's accident on 05/06/2014 and that he left the piece of molding in the trunk of the car. McLaughlin stated that the damage from his

Page ___ of ___



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wife's 05/06/2014 accident was submitted to his insurance company, Atlantic States Insurance Company policy number CAA8663018. Atlantic States Insurance is a subsidiary of Donegal Insurance Company. McLaughlin also reported that he never had either the 05/06/2014 damage or the damage caused by subsequent accidents repaired and that he traded in the car to Conshohocken Porsche Audi with the damage still present and the broken piece of molding still in the trunk of the car.

- F. On 09/28/2018, your Affiant received the claim file from Donegal Insurance for their subsidiary Atlantic States Insurance Company for policy 3CAA-8663018. The file involved claim #CAA-PA01-14-0415570 for an accident that occurred on 05/06/2014 involving the 2012 Mercedes Benz GL 550 bearing vehicle identification number 4JGBF8GE2CA789964 and operated by Kathleen McLaughlin. Included in that claim file were Donegal's photographs of this damage to the 2012 Mercedes Benz. The photographs depict the same damage claimed by Asfand Ali in connection with his 04/02/2018 claim to Encompass Insurance.
- G. Based on the foregoing, your Affiant concludes that probable cause exists that Christen Ali committed the following crimes:

18 Pa.C.S.A. §4117(a)(2)	Insurance Fraud (F3)
18 Pa.C.S.A. §901 / §3922(a)(1)	Criminal Attempt / Theft by Deception (F3)
18 Pa.C.S.A. §903(a)	Criminal Conspiracy (F3)
18 Pa.C.S.A. §7512(a)	Criminal Use of Communication Facility (F3)



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	//		IF 2018-0954
	First:	Middle:	Last:
Defendant Name:	CHRISTEN	ELIZABETH	ALI

I, SPECIAL AGENT PAUL BLASH, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

		(Signature of Affiant)
Sworn to me and subscribed before me this	day of	
Date		, Magisterial District Judge
My commission expires first Monday of January,		SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT **COMMONWEALTH OF PENNSYLVANIA** COUNTY OF: PHILADELPHIA VS. Magisterial District Number: (NAME and ADDRESS): MDJ: Hon. **BERNARD** SINCERE Address: 1301 Filbert Street DAVID First Name Middle Name Last Name Gen Philadelphia, PA 19107 1742 S. Edgewood Street Philadelphia, PA 19142 Telephone: (215)683-7283 NCIC Extradition Code Type □ C-Misdemeanor Surrounding States 5-Felony Pending Extradition 1-Felony Full ☐ Distance: 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 2-Felony Limited ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☑ 3-Felony Surrounding States ☐ F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Complaint/Incident Number Date Filed OTN/LiveScan Number Docket Number ☐ YES 🖾 NO IF2017-0277 Co-Defendant(s) Add'l DOB **GENDER** ров 06/19/1943 ров Alabama Last Name Gen. Middle Name First Name ☐ Female AKA Native American Unknown Asian RACE ☐ White Hispanic **ETHNICITY** Non-Hispanic Unknown BRO (Brown) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) ☐ PLE (Purple) GRY (Gray) Hair GRN (Green) PNK (Pink) WHI (White) XXX (Unk./Bald) BLK (Black) ONG (Orange) Color BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BLK (Black) BLU (Blue) BRO (Brown) Eye ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) Color ■ MUL (Multicolored) ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) DNA FBI Number 245 **MNU Number** 96766H Ft. HEIGHT In. **Defendant Fingerprinted** ☑ YES □ NO 10 Fingerprint Classification: **DEFENDANT VEHICLE INFORMATION** School Veh. Oth, NCIC Veh, Code Reg. Haz Comm'l Veh. Registration State Ind. same as mat Plate # KGD9779 PA Sticker (MM/YY) 10/17 Def. Color Make Model Style VIN Year \boxtimes 2002 S/W Jeep Cherokee 1J4GW58J12C134499 (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). SDAG LINDA MONTAG (Signature of the altorney for the Commonwealth) (Name of the attorney for the Commonwealth) # 558 SA STEVEN WALKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) 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 [301] 5532 Chestnut Street Philadelphia, (Subdivision Code) (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] Pa 19139 on or about NOVEMBER 10, 2016 in PHILADELPHIA County [51] (County Code)



			ά	PO			COMPLAINT
Docket Number:	Date Filed:	OTN	/LiveScan Numbe	r		aint/Incident N	lumber
	11		dialaha.	Las		7-0277	
Defendant Name:	First: DAVID		/liddle: BERNARD	1	NCERE		
The acts committed b When there is more the summary without more, is not sufficient age of the victim at the be listed. If the identity of a	nan one offense, e of the facts sufficient t ent. In a summary cas time of the offense m	each offense show to advise the defenda e, you must cite the s av be included if kno	uld be numbered ant of the nature of the specific section(s) and own. In addition, socia	chronologie e offense(s) c d subsection(Il security nun	Cally. harged. A cit s) of the stat nbers and fin	ation to the statu ute(s) or ordinan nancial information	ute(s) allegedly violated, ice(s) allegedly violated.
Inchoate			nspiracy 903	N	lumber of Vi	ictims Age 60 o	r Older
⊠ #1 4117	(a)(1) of the	TITLE 18	1 F	-3		
Offense	Section Subse	/	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			nterstate	□s	afety Zone	☐ Work Zone
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD Acts of the accused associated with this Offense: The defendant did, knowingly and with the intent to defraud a State or local government agency files, presented or caused to be filed with or presented to the government agency a document that contains false, incomplete or misleading information concerning any fact or thing material to the agency's determination in approving or disapproving a motor vehicle insurance rate filing, a motor vehicle insurance transaction or other motor vehicle insurance action which is required or filed in response to an agency's request. To wit; On November 10, 2016, David Sincere did present an altered/ forged/ fraudulent State Farm Financial Responsibility Insurance card to an auto tag agency in order to transfer a Pennsylvania vehicle Title.							
Inchoate ☐ Attemp Offense 18 901 /			nspiracy 903		Number of V	ictims Age 60 c	or Older
□ # 2 410	L (a)(((1)(2 of the	TITLE 18	1 F	-3		
Lead? Offense#		ection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			nterstate		Safety Zone	☐ Work Zone
Statute Description (include the name of statute or ordinance): FORGERY Acts of the accused associated with this Offense: The defendant did, with intent to defraud another and with knowledge that he is facilitating a fraud, alter any writing of another without his authority; makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act, or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed. To wit; David Sincere did present a altered/ forged/ fraudulent State Farm Financial Responsibility Insurance card to a Pennsylvania Auto Tag Agency in order to show proof of vehicle insurance and Financial Responsibility to facilitate a vehicle Title transfer.							
Inchoate ☐ Atte			onspiracy	Number	of Victims A	Age 60 or Older	
) (1) of the	TITLE 18	1 1	M-2		
Lead? Offense#		J (1) Jbsection	PA Statute (Title)	Counts	Grade	NCIC Offense	Code UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number —			☐ Interstate] Safety Zone	☐ Work Zone
Statute Description (nclude the name	of statute or ordir	nance): TAMPERIN	IG WITH PU	BLIC RECOF	RDS OR INFOR	MATION
Acts of the accused a thing belonging to, or recognized government. To wit; David	eived or kent hv. the a	overnment for inform	nation or record, or re	quired by law	to be kept b	y others for infor	ny record, document or mation of the

POLICE CRIMINAL COMPLAINT
OTN/LiveScan Number
Complaint/Incident Number

Docket	Number:		Date	Filed:		OTN	/LiveScan I	Num	ber				laint/Incident Nun 7-0277	nber
Defenda	ant Name	9 :	First:	_/ D			Middle: BERNARD				Last: SIN(
Inchos Offens		Attempt 18 901 A		☐ Solic 18 90		☐ Con 18 9	spiracy 03			Number	r of V	/ictims A	ge 60 or Older	
	# 4	7121			848	f the	TITLE 75			L	M-		NCIC Offense Code	UCR/NIBRS Code
	Offense# nDOT Dapplicab	ata	Section Accide Numb	nt	section		PA Statute (T			Counts nterstate		Grade	Safety Zone	☐ Work Zone
Statute	Descrip	otion (inc	lude the	e name	of statute	or ordin	ance): FALS	SE AI	PLI	CATION	FOR	CERTIF	ICATE OF TITLE OF	REGISTRATION
or fail to a materia	disclose a	security in esentation	nterest, o by prese	r concoal :	any other maged altered/	aterial fac	t in an annlica	ation	for a	certificat	re of t	title or for	dress or make a mate registration. To wit; insurance card to an	David Stricere make
Incho Offer	ged/augustagspate	Attem ₁ 18 901			icitation 202 A		onspiracy 903			Numb	er of	Victims	Age 60 or Older	
	# 5	712		1 7	.)(2)	of the	TITLE 75			1		M-1 Grade	NCIC Offense Code	UCR/NIBRS Code
	Offense nnDOT [Data	Section Acci	dent	ubsection		PA Statute	(Title)		Counts Interstate			Safety Zone	☐ Work Zone
Statute	applical Descri	otion (in	Num Clude th	e name	of statute	or ordir	nance): ALT	ERE	D, FO	ORGED C	OR CC	DUNTER	FEIT DOCUMENTS	AND PLATES
Acts of the accused associated with this Offense: The defendant did, with fraudulent intent, alter, forged or counterfeited a certificate of title, registration card or plate, inspection certificate or proof of financial responsibility. Defendant also has possession of, sells or attempts to sell, uses or display a certificate of title, registration card or plate, driver's license, inspection certificate proof of financial responsibility or any other document issued by the department, knowing it to have been altered, forged or counterfeited. To wit; David Sincere did fradulently alter and or forged a State Farm Financial Responsibility Insurance card and presented it to an auto tag agency in order to register a Pennsylvania vehicle Title. Inchoate														
						of the					T		(*************************************	
Lead?	Offens ennDOT f applica	Data ble)	Nur	ident nber -	Subsection		PA Statute	e (Title		Counts Interstat		Grade	NCIC Offense Cod ☐ Safety Zone	e UCR/NIBRS Code Work Zone
Statute Description (include the name of statute or ordinance):														
Acts o	f the acc	cused a	ssociate	ed with th	nis Offens	e:								



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF2017-0277			
Defendant Name:	First:	Middle: BERNARD	Last: SINCERE			
	DAVID	DEKNAKU	SINCLNL			

- 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 1 through ___.
- 5. 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 that 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.)

1111/100		SA Halle #5	58
(D. 1.)	(Year)	(Signature of Affiant)	
(Date) AND NOW, on this date	10/25/18	l certify that the complaint has been properly completed and	d verified.
An affidavit of probable cause	must be completed before a w	arrant can be issued.	
(Magisterial District Court Nun	nber) (Iss	uirts Abutionty) SEAL	
	/) OLAL	

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF2017-0277
Defendant Name:	First:	Middle: BERNARD	Last: SINCERE

AFFIDAVIT of PROBABLE CAUSE

Your Affiant is Steven Walker, a Special Agent with the Pennsylvania Office of Attorney General (OAG); Bureau of Criminal Investigation (BCI), Insurance Fraud Section. Your Affiant has over 29 years of law enforcement/criminal investigation experience. The facts set forth in this affidavit are based upon review of pertinent documents and/or interviews of witnesses by your Affiant or other agents assigned to the Insurance Fraud Section of the Pennsylvania Office of Attorney General. Your Affiant has participated in hundreds of investigations of, and arrests for, violations of the Pennsylvania Crimes Code and being duly sworn according to law deposes and says the following:

- A) The OAG, Insurance Fraud Unit received information that David Bernard Sincere, DOB 06/19/1943, of 1742 S. Edgewood St. Philadelphia, PA 19142 is producing fraudulent insurance cards.
 - As part of the investigation a request was made to the Pennsylvania Department of Transportation, (Penn Dot), for a title search for any and all vehicles registered to Sincere. This request was submitted on May 21, 2018 and yielded one vehicle registered to Sincere.
 - Your Affiant examined the Title History returned from Penn Dot and it revealed the vehicle to be a 2002 Jeep with Title Number 66014480 and bearing VIN 1J4GW58J12C134499. The Penn Dot computerized transaction form dated November 10, 2016, number 163153428015050, also contained all documents presented to automobile registration which took place at CEE Johnson's Auto Tag at 5532 Chestnut Street Philadelphia, PA 19139. One of the documents presented was a Pennsylvania Financial Responsibility Card allegedly issued by State Farm Insurance Company for Policy # 103-1724-K05-27C and issued in the name of David B. Sincere 1742 S. Edgewood St. Philadelphia, Pa 19142. A copy of the Financial Responsibility Card was examined by an underwriter from State Farm Insurance Company who determined it to be fraudulent. State Farm determined the card to be fraudulent for the following reasons:
 - 1) The policy number is not for this insured, David Sincere.
 - 2) The State code is not correct. Code 27 is for Nebraska, not Pennsylvania.
 - 3) The NAIC number contained on the card was, "25143," this NAIC number is not for State Farm Mutual Automobile Insurance Company.
 - 4) Tony Nastasi is incorrectly listed as an Authorized Representative. Tony Nastasi is an authorized State Farm insurance agent in Pennsylvania, but he is not an Authorized Representative of State Farm. Current State Farm financial responsibility cards no longer list an Authorized Representative, and State Farm agents were never listed as an Authorized Representative on the cards.
 - 5) The logo is not correct. There is no longer a border around the logo and it only says SF.
 - 6) The insured's name is not in the correct order. The last name should be listed first, then the first name.
 - 7) The overall layout of the card does not meet the current design of how a State Farm financial responsibility card should be formatted.

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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF2017-0277		
Defendant Name:	First:	Middle: BERNARD	Last: SINCERE		

B) On July 23, 2018, your Affiant went to the Philadelphia Criminal Justice Center at 1301 Filbert Street Philadelphia, PA 19107 and presented a search warrant application (SW-18-006) to the Bail Commissioner. The Philadelphia Bail Commissioner reviewed the application and issued a search warrant to seize records pertaining to David B. Sincere from an auto title transfer he conducted at CEE Johnson Auto Tag 5532 Chestnut Street Philadelphia, PA 19139.

Your Affiant then served the search warrant on Craig Johnson at CEE Johnson Auto Tag. Johnson and his associate, Alan Gibson, were advised that your Affiant wanted to examine the documents he had regarding a title transfer he conducted for David Sincere on November 10, 2016.

Alan Gibson checked their files and returned with the requested documents. They provided your Affiant with copies of the Pennsylvania Department of Transportation (Penn-Dot) Computerized Vehicle Registration form, copies of the font and back of the Title for VIN: 1J4GW58J12C134499 as well as a copy of David B. Sincere's Pennsylvania Identification card and a State Farm Financial Responsibility Insurance Card in David B. Sincere's name for Policy # 103-1724-K05-27C. Your Affiant took possession of these items as evidence.

While on location at CEE Auto Tag your Affiant took a statement from Craig Johnson. Johnson was questioned related to the title transfer transaction he performed for David B. Sincere on November 10, 2016. Johnson was asked specifically about the Pennsylvania Identification card and State Farm Financial Responsibility Insurance Card both in David Sincere's name, which were copied as part of the title transfer. Johnson acknowledged that he took the PA Identification card and State Farm Financial Responsibility Insurance Card from Sincere, that this is the normal procedure for a transaction, and is required by Penn-Dot to complete the transfer and photo copied them as part of the file which he maintains in a regular course of business.

- C) On August 1, 2018, your Affiant interviewed State Farm Insurance Agent Tony Nastasi at his office regarding the State Farm Financial Responsibility Insurance Card that David B. Sincere presented during the vehicle registration process. Nastasi reviewed the card and confirmed it was not a legitimate State Farm Insurance card issued by him or any representative of his office. He further observed that the policy number was not a valid Pennsylvania number and that the phone number listed on the card was not his.
- D) Based on the forgoing, your Affiant believes probable cause exists that the following crimes have been committed by David Bernard Sincere;

18 Pa. C.S.A. § 4117 (a) (1) Insurance Fraud (F-3)

18 Pa. C.S.A § 4101 (a) (1) (2) Forgery (F-3)

18 Pa. C.S.A § 4911 (a) (1) Tampering With Public Records or Information (M-2)

75 Pa. C.S.A. § 7121 False Application for Certificate of Title or Registration (M-1)

75 Pa. C.S.A. § 7122 (1) (2) Altered Forged or Counterfeit Documents and Plates (M-1)

	POLICE	CRIMINAL	COMPL	AINT
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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF2017-0277
	First:	Middle:	Last:
Defendant Name:	DAVID	BERNARD	SINCERE

I, SA STEVEN WALKER, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	Sa Hubler #558
Sworn to me and subscribed before me this	(Signature of Affiant)
Sworn to me and subscribed before me this	
Date	, Magisterial District Judge
My commission expires first Monday of January,	
	SEAL
//	

COMMONWEALTH OF PENNSYLVANIA COUNTY OF:PHILADELPHIA POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA	•
Magisterial District Number:	-
MDJ: Hon. DEFENDANT: (NAME and ADDRESS):	
Address: 1301 Filbert St. EILEEN SANZONE	
Philadelphia,PA.19102 First Name Middle Name Last Name	Gen
Telephone: (215)683-7283 1020 Johnston Street Philadelphia,PA.19148	
NCIC Extradition Code Type	
☐ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: ☐ 2-Felony Limited ☐ 6-Felony Pending Extradition Determ ☐ D-Misdemeanor No Extradition	
Maria o Maria Daniel Maria Dani	
El a moderno and a contract of ording extradition	
☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION	
Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number Request Lab Ser	vices?
GENDER DOB 02/10/1984 POB Add'I DOB / / Co-Defendant(s)	
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RACE Mybile Asign District	
RACE White Asian Black Native American Unknown ETHNICITY Hispanic Unknown	
☐ GRY (Gray) ☐ RED (Red/Aubn.) ☐ SDY (Sandy) ☐ BLU (Blue) ☐ PLE (Purple) ☐ BRO (Brown)	
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Color ☐ BLN (Black) ☐ ONG (Orange) ☐ WHI (White) ☐ XXX (Unk./Bald) ☐ GRN (Green) ☐ PNK (Plnk) ☐ BLN (Blonde / Strawberry)	
Eye ☐ BLV (Black) ☐ BLU (Blue) ☑ BRO (Brown) ☐ GRN (Green) ☐ GRY (Gray) Color ☐ HAZ (Hazel) ☐ MAR (Maroon) ☐ PNK (Pink) ☐ MUL (Multicolored) ☐ XXX (Unknown)	··· - <u>·······</u>
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Financial Objection 15 and 15	In.
DEFENDANT VEHICLE INFORMATION 5 2	
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Office of the attorney for the Commonwealth	
(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth p filing. See Pa.R.Crim.P. 507).	rior to
SDAG LINDA MONTAG STATE 9 417	ベノウ
(Name of the altorney for the Commonwealth) (Signature of the altorney for the Commonwealth)	担 つ
(Date)	
1, SPECIAL AGENT PAUL BLASH 711765 #535 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #	
of Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box)	
 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 	
The second design and	
☐ 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 [301] Philadelphia,Pa 19148 1020 Johnston Street (Subdivision Code) (Place-Political Subdivision)	
in PHILADELPHIA County [51] on or about JANUARY 19, 2015 THROUGH APRIL 14, 2015	
(County Code)	

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Docket Nu	mber:		Date /	Filed:		ОТ	N/LiveSca	n Nur			OL	Comp	plaint/Incident 15-0343		Der Der
Defendant	Name	1	First: EILEE	N			Middle:				Last: SAN	ZONE	10 00-10		
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		4117		(a)(2	2)	of the	TITLE 18	3		1	F-3				
Lead? Off	ense #	Se	ction	Subse	ection		PA Statute	(Title)		Counts	G	rade	NCIC Offense Code	,	UCR/NIBRS Code
PennDC (if appl		1 1	Accident N	lumber				[] In	iterstate			Safety Zone		☐ Work Zone
			lude the	name o	of statu	te or ordi	nance): 18	B PA C	.s.a	. §4117 (A) (2) INSUR	ANCE FRAUD	(F-3)	
Acts of the accused associated with this Offense: The defendant knowingly and with the intent to defraud USAA Insurance presented or caused to be presented statements forming a part of an insurance claim filed on January 19, 2015, that contain false, incomplete or misleading information concerning any fact or thing material to a claim; to wit, Eileen Sanzone did deliberately provide false information to USAA Insurance Company that jewerly had been taken in a burglary on December 17, 2014. The defendant provided photos of the stolen jewerly that were photos taken after the items were allegedly stolen. Additional items were added to the claim and the proof of ownership photos of the "added" items were images from the internet. Value of the claimed jewerly is \$9,000. Inchoate Attempt Solicitation Conspiracy Number of Victims Age 50 or Older.															
Offense		18 901 A	4	18 90	02 A	18	903						Age 60 or Older		
Lead? C) Offense#	7512	Section	(a)		of the	TITLE 1			1	_ F-				
PennD	OT Da	ta	Accide	ent	bsection		PA Statut	e (Title)		Counts Interstate		Grade	NCIC Offense Safety Zone	Code	UCR/NIBRS Code Work Zone
Statute De	olicable scripti		Numb lude the	1	of statu	te or ordi	nance): 18	PA.				1	AL USE OF CON	4MUN1	
Acts of the commission of photos of alle	Acts of the accused associated with this Offense: On March 26, 2015, the defendant used a comminication facility to commit, cause or facilitate the commission or attempt thereof of any crime which constitutes a felony under this title; to wit, on March 26, 2015, the defendant used a computer to upload photos of alleged stolen jewerly which were photographed after the date of the burglary on December 17, 2014, in an attempt to commit Insurance Fraud, a felony under Title 18.														
Inchoate Offense	×	Attempt 18 901 A		☐ Solid 18 90			onspiracy 3 903		· · ·	Numbe	er of \	/ictims /	Age 60 or Older		
		3922			(1)	of the	TITLE 1			1	F-	-3			
PennD		ta	Section Accide		bsection		PA Statut	e (Title)		Counts		Grade	NCIC Offense	Code	UCR/NIBRS Code
(if app Statute De			Numb lude the		of statu	te or ordii	nance): 18	PA. C		Interstate . § 3922		1] Safety Zone T BY DECEPTION	ON (F3	Work Zone
Acts of the constitutes a a claim filed of	accus substar on Janu were tal	sed ass htial step ary 19, 20 ken after	ociated towards t 015, that the Items	with this he commi various je had been	s Offen ssion of I welry had reported	se: The de that crime; d been take d stolen. Ad	efendant with to wit, Eileer en in a burgla Iditional item	the in Sanzo	ntent one o	to commit did supply ember 17	t the c USAA 2014	rime of t Insurand	heft by deception	n did a	ny act, which

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
			IF 2015-0343
Defendant Name:	First:	Middle:	Last:
Delendant Name;	EILEEN		SANZONE

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant is Special Agent Paul Blash of the Insurance Fraud Section of the Pennsylvania Office of Attorney General. Your Affiant has participated in hundreds of investigations and arrests for violations of the Pennsylvania Crimes Code. Being duly sworn according to law, your affiant deposes and says:
- B. Your Affiant was assigned to investigate an allegation of insurance fraud regarding false and misleading information provided by Eileen Sanzone to USAA during the course of an insurance claim at her home and property insured by USAA. The property is located at 1020 Johnston Street in the city and county of Philadelphia, PA. USAA is an insurance company doing business in Pennsylvania. This case was referred to the Pennsylvania Office of Attorney General by Trish Espinosa, special investigator for USAA. The following facts demonstrate probable cause to believe Eileen Sanzone committed the crimes of Insurance Fraud, Criminal Use of a Communication Facility and Criminal Attempt Theft by Deception.
- C. On 11/27/2017, your Affiant interviewed Trisha Espinosa from USAA SIU unit regarding the claim file of claim number 17727395-1. Your Affiant also reviewed the claim file and other documents associated with this claim. As a result of this interview and file review, your affiant learned:
 - 1. Espinosa confirmed via USAA claim file documents that their insured Carlyle Sanzone (husband of Eileen Sanzone) called the USAA Call Center initiating a property theft claim for a burglary that occurred on December 17, 2014, at their home at 1020 Johnston Street, Philadelphia, PA. Carlyle Sanzone represented that he was not residing at the residence at the time of the burglary, but his wife Eileen Sanzone had informed him of the burglary and she would be contacting USAA.
 - 2. Eileen Sanzone (wife of Carlyle Sanzone) resided at 1020 Johnston Street. Eileen Sanzone called Philadelphia Police to report the burglary on December 17, 2014. Philadelphia Police responded and burglary report # 2014-03-076571, was generated. Eileen Sanzone reported to police that she left her back door unlocked. According to the Philadelphia Police report, Eileen Sanzone told Philadelphia Police Officer Michael Duffy, Badge #4033 that approximately \$1,000 worth of jewelry was taken. Four items of value included one wedding band, one Mickey and Minnie mouse gold ring, one Guess watch black face/ silver band, one watch with a brown band and "a bunch of costume jewelry."

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Defendant Name	First:	Middle:	Last:	
Defendant Name:	EILEEN		SAN	ZONE

- 3. A claim call from Eileen Sanzone was recorded on January 19, 2015 by USAA Insurance Company. Eileen Sanzone stated that she had accidently left her door unlocked when picking up her son from school and came home to a completed burglary. During the call, Sanzone claimed the following items as missing: one engagement ring; one IPAD Mini; one Kindle Fire; one Dyson vacuum cleaner; one Swarovski necklace; one pair of Swarovski earrings; one Dell computer; one diamond tennis bracelet; one men's Armani watch; one women's Armani watch. It should be noted that the Philadelphia Police report did not contain items that Eileen Sanzone later reported stolen to USAA Insurance.
- 4. Specifically, when asked by USAA call taker about her jewelry, Eileen Sanzone stated that her jewelry loss was "between eight and nine [thousand dollars]" The Philadelphia Police report reflects that only \$1,000 worth of jewelry was initially reported stolen. The Homeowners limit for policy number, 17727395-1, for jewelry was \$10,000.
- 5. Eileen Sanzone was asked during the recorded claim call of January 19, 2015, if she had a receipt for her diamond engagement ring. Eileen Sanzone responded, "I am sure if I look through my files it's somewhere". She further stated, "I have pictures of my ring". Later when she submitted Verification of Ownership of the engagement ring, Eileen Sanzone submitted an internet photo of a ring that looks like her engagement ring. No original photo from her engagement in Key West, Florida was submitted to USAA, even though Eileen Sanzone stated she had one. No original photos of her wedding that showed their wedding bands were submitted to USAA. Two letters of claims correspondence were sent to her home asking for Verification of Ownership, dated January 12, 2015 and February 23, 2015. Neither of the USAA letters stated that a facsimile of an item or that an internet photo was acceptable Verification of Ownership. Sanzone failed to comply with a request for a receipt.
- 6. On February 23, 2015, Eileen Sanzone uploaded a handwritten list to USAA listing the following 14 items as stolen: Diamond Ring \$8,900; Wedding Bands set (2) \$500; Swarovski Necklace and Earrings set (2) \$150; Guess Watch (Men's) \$139; Fossil Watch (Men's), Armani His and Hers Watches \$250 (2); Tennis Bracelet \$250; Dyson Vacuum cleaner \$599; Dell Alien ware \$2,100; Apple I-Pad mini (No amount given); Kindle Fire \$150. The claimed amount totaled \$13,038. USAA appraisal of these items was approximately \$9,347 less the policy deductible of \$1,000 for of a potential total payout of \$8,347.

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Deferiuant Name.	EILEEN		SANZONE

- 7. In total, Sanzone uploaded twelve (12) photographs in support of her property claim to USAA. Six (6) of these included generic stock photographs obtained from the internet, to include an internet photo of a Diamond Ring; Dell Alien Ware; Apple I-Pad Mini; a set of Wedding Bands; a Dyson vacuum cleaner; a Kindle FIRE. The remaining six (6) uploaded photographs were jewelry that were claimed to be photographed by Sanzone on a distinctive bedspread. These items consist of a man's Watch with a brown leather band; a square silver colored man's watch with a metal band; a silver colored square watch with a brown leather band; a ladies diamond bracelet; a Guess silver colored watch with a metal band; a photo showing two ladies bracelet watches both watches silver in color. The metadata from these photos show that these photographs were taken on March 06, 2015. Eileen Sanzone did not provide any receipts as proof of the purchases. It is not USAA policy to accept facsimile photos and USAA would not have requested that Sanzone provide any internet stock images.
- D. Investigator for USAA Insurance Company. Jim Riehman, was assigned to investigate claim number, 17727395-1. On December 12, 2017, Special Agent Anthony Ammaturo and your Affiant interviewed Jim Riehman who stated the following:
 - 1. He interviewed Eileen Sanzone on April 3, 2015, at her home, 1020 Johnston Street Philadelphia, PA. He obtained a recorded statement. In the recording Sanzone stated that on December 17, 2014, unknown person or persons entered her house through an unlocked back door and took various items.
 - 2. Among the claimed stolen items were six pieces of jewelry that were photographed and the images were sent to USAA. Riehman stated that USAA's analysis of the metadata of these items indicated that the photos were taken on March 6, 2015, which is after the date of loss December 17, 2014.
 - 3. Eileen Sanzone stated that she sent the photos to USAA. Riehman provided a copy of the photos sent by Eileen Sanzone, as well as a copy of the corresponding metadata for each photo, to your Affiant.
 - 4. Eileen Sanzone told Riehman that her husband Carlyle had emailed her the photos and that she then used her cell phone to screen shot the photo, which she later sent to USAA.

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Delendant Name:	EILEEN		SANZONE

The metadata performed on the six photos shows that the function used by the I-Phone was the camera function, not consistent with a "screen shot", as Eileen Sanzone suggested.

- 5. Riehman interviewed Eileen Sanzone on April 14, 2015, requesting that she resend the original six photos and the email her husband sent her to USAA. Riehman stated that Sanzone has failed to send the original emails and photos to USAA to date.
- E. In summary, Eileen Sanzone did knowingly and intentionally provide false and misleading information to USAA Insurance. Eileen Sanzone stated that jewelry was stolen from her home and provided false photos to support her claim. Sanzone attempted to obtain an insurance payment in excess of \$2,000.00, to which she was not entitled.
- F. Based on the foregoing, your Affiant respectfully requests the issuance of a warrant so that Eileen Sanzone may answer the following charges:

18 PA C.S.A. §4117 (a) (2) Insurance Fraud (F-3)

18 PA. C.S.A. §7512(a) Criminal Use of Communication Facility (F3)

18 PA. C.S.A. § 3922 (a) (1) Theft by Deception (F3)

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Oocket Number:	Date Filed:	OTN/Liv	eScan Number		Complaint/In IF 2015-03	cident Number 43	4 300
Defendant Name:	First: EILEEN	Midd	le:	Last: SAN	ZONE		
2. I ask that a warra made.	ant of arrest or a su	mmons be issued	and that the defe	ndant be	required to ar	nswer the charge	es I have
	acts set forth in this ication is made sub cation to authoritie:	ject to the penaltic					
4. This complaint c	onsists of the prece	eding page(s) num	bered 1 through _	<u>_</u> .			
information and definition and defin	ylvania that require ocuments. I by the accused, a d were contrary to of arrest can be is	filing confidential s listed and herea the Act(s) of the A	information and d fter, were against ssembly, or in vio	ocument the peac lation of	s differently the ee and dignity the statutes ci	at non-confident of the Commony ted.	tial wealth
issuing authority,	and attached.)			ez i			76
		(Date)			(Sig	gnature of Affiant)	
AND NOW, on this d	ate	,	l certify that the	complaint	has been prop	erly completed an	d verified.
An affidavit of probab	le cause must be co	npleted before a wa	rrant can be issued	•			
					•		
(Magisterial District C	Court Number)	(Issui	ing Authority)			SEAL	
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POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA **COMMONWEALTH OF PENNSYLVANIA** COUNTY OF: MONTGOMERY VS. Magisterial District Number: 38-01-23 (NAME and ADDRESS): DEFENDANT: MDJ: Hon, Deborah Lukens **BOULWARE** Addres 002 Center Ave **ERIC** Last Name Gen Middle Name First Name "Lafavette Hill,PA.19444 5814 N.6th Street Philadelphia, PA 19120 Telephone: (610)828-5226 NGIC Extradition Code Type ☐ C-Misdemeanor Surrounding States 1-Felony Full 5-Felony Pending Extradition ☐ Distance: ☐ D-Misdemeanor No Extradition 6-Felony Pending Extradition Determ. 2-Felony Limited ☐ E-Misdemeanor Pending Extradition A-Misdemeanor Full ☐ 3-Felony Surrounding States ☐ F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Complaint/Incident Number OTN/LiveScan Number Docket Number ☐ YES ☐ NO 24-18 10608951-0 CR-92-18 IF2016-0033 Co-Defendant(s) Add'I DOB ров 04/22/1980 РОВ **GENDER** Last Name Gen. Middle Name First Name Male Male ☐ Female AKA Unknown Native American White Asian RACE Unknown Hispanic Non-Hispanic **ETHNICITY** BRO (Brown) PLE (Purple) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) GRY (Gray) Hair PNK (Pink) GRN (Green) XXX (Unk./Bald) ONG (Orange) WHI (White) BLK (Black) Color BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BRO (Brown) BLU (Blue) ☐ BLK (Black) Eye XXX (Unknown) MAR (Maroon) PNK (Pink) MUL (Multicolored) ☐ HAZ (Hazel) Color WEIGHT (lbs.) ∃NO **DNA Location** DNA ☐ YES 215 FBI Number MNU Number 332023LB4 Ft. HEIGHT in. ☐ YES □ NO Defendant Fingerprinted 1 6 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh, Code Reg. School Veh. Comm'l Veh. Registration State Haz same as Ind. 🔲 mat Sticker (MM/YY) Plate # Def. Color Style Year Make Model VIN 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). 117/2018 KENNETH MCDANIELS SDAG (Signature of the attorney for the Commonwealth (Name of the attorney for the Commonwealth) (Date) PAUL BLASH SPECIAL AGENT 711765 BADGE #535 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 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 5165 Campus Drive Plymouth with violating the penal laws of the Commonwealth of Pennsylvania at [107] (Place-Political Subdivision) (Subdivision Code) Meeting, PA 19462 In Plymouth Township on or about 08/21/2015 THRU 12/03/2015 in MONTGOMERY County [46] (County Code)

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Docket Number:	Date Filed:	OTN/L	iveScan Numb	er		nplaint/incident f 016-0033	lumber	
Defendant Name:	First: Middle: ERIC			i	Last: BOULWARE			
The acts committed by When there is more that (Set forth a <i>brief</i> summary of without more, is not sufficier. The age of the victim at the tibe listed. If the identity of an	in one offense, e the facts sufficient t it. In a summary cas ime of the offense m	ach offense shoul o advise the defendar e, you must cite the sp ay be included if know	ld be numbered it of the nature of to pecific section(s) a m. In addition, soc	l Chronolo he offense(s nd subsecti ial security	ogically. s) charged. A on(s) of the numbers an	A citation to the stat statute(s) or ordinar d financial informati	ute(s) alleg ice(s) alleg	edly violated, edly violated.
Inchoate ☐ Attempt Offense 18 901 A	☐ Solici 18 902				Number	of Victims Age 60 o	r Older _	
⊠ 1 4117	(a)(2) of the T	ITLE 18	1	F-3			
Lead? # Se	ection Subse	ction	PA Statute (Title)	Counts	Grade	NGIC Offense Code	UCR/I	NIBRS Code
*: (if applicable)	Accident Number		1 –	Interstate		☐ Safety Zone		Work Zone
Statute Description (inc	sociated with this	s Offense: The defe	ndant did. knowing	lly and with	the intent to	o defraud any insure	er or self-ins	sured, present
cause to be presented to any misleading information conce personal injury claim himself	arning any fact or thi	ng material to the clair	m:towit:On8/21	/15. the det	endant did k	(nowingly and with f	raudulent li	ntent meu a
Inchoate Attemp			nspiracy	Numb	er of Victin	ns Age 60 or Older		•
Offense 18 901	A 18 90)2 A 18 9	03					
□ 2 392		1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	TITLE 18 PA Statute (Title)	Counts	F-3 Grade	NCIC Offense	Code U	CR/NIBRS Code
Lead? Offense# PennDOT Data	Accident	bsection		☐ Interstat		☐ Safety Zone	Ţ	Work Zone
(If applicable) Statute Description (inc (F3)	Number — — clude the name o	of statute or ordina	ance): 18 PA.C.S	.A §3922(<i>I</i>	A)(1) CRIN	INAL ATTEMPT T	HEFT BY E	DECEPTION
Acts of the accused as Deception, did any act which accident being filed against fidid so in an attempt to cause	i constituted a substi Progressive Insuranc	antial step toward the e Company , did know	commission of that ingly provide false	t crime; to v information	vit: defendal regarding n	nt, in connection wit nedical treatment th	n a ciaim ro	or an auto
Inchoate Attem			nspiracy 903	Num	ber of Victir	ns Age 60 or Older		-
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Lead? Offense#	Section Su	bsection	PA Statute (Title)	Counts				CR/NIBRS Code Work Zone
(if applicable) Statute Description (inc	Number —	of statute or ordina		☐ Interstat	te	Safety Zone	<u> </u>	AAOIK TOUG
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Acts of the accused as	sociated with thi	s Onense.						
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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF2016-0033
Defendant Name:	First: ERIC	Middle:	Last: BOULWARE

- 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 1 through ____.
- 5. 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 that 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.)

(Date)

(Date)

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.

(Magisterial District Court Number)

(Issuing Authority)

SEAL

	Docket Number:	Date Filed: / /	OTN/LiveScan Numb	complaint/incident Number	
	Defendant Names	First:	Middle:	Last:	
١	Delendant Name:	ERIC		BOULWARE	

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant, Special Agent Paul Blash of the Insurance Fraud Section of the Pennsylvania Office of Attorney General, being duly sworn according to law, deposes and says:
- B. The Pennsylvania Office of the Attorney General, (OAG), received an insurance fraud referral from Progressive Insurance Company's SIU Investigator Jason Truitte. Progressive is an insurance company doing business in Pennsylvania. Truitte alleges that Progressive received an application for benefits from Eric Boulware, DOB: 04/22/1980, 584 N. 6th Street, Philadelphia, Pa 19120, and that Boulware committed Insurance Fraud and related crimes. As described below in greater detail, your Affiant's investigation establishes that there is probable cause to believe that Boulware committed the crimes of Insurance Fraud and Criminal Attempt Theft by Deception.
- C. In connection with your Affiant's investigation into Progressive Insurance allegations, your Affiant reviewed Progressive's insurance claim and file notes, as well as other documentation provided by Progressive Insurance that was related to Boulware's claim. Based on this, your Affiant interviewed Jason Truitte on 12/11/17 and learned the following:
 - 1. Truitte stated that Melissa Reed purchased a Progressive auto insurance policy covering her 2011 BMW X-3 PA registration JTM-8957, VIN: 5UXWX5C56BL704536 on 03/19/2015 from Progressive Insurance Company. Progressive Auto Insurance Policy# 905411327 was issued to Melissa Reed.
 - 2. On 06/13/2015, Melissa Reed called in a claim reporting that she had been in an accident on Roosevelt Boulevard at Langdon Street. Reed stated that she had been in a two-car crash with Nathan Hill who was operating a Dodge SRX, PA registration JCK4718, VIN: 1B3EL46X56N109530 insured by Allstate policy # 952869293. Truitte indicated that on 6/13/2015, Progressive Insurance obtained a recorded statement for the claim reported by Melissa Reed. In the statement, Reed told Progressive that she and her two-year-old son were in her car at the time of the accident.



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Defendant Name:	First: ERIC	Middle:	BOULWARE

- 3. Reed told Progressive that Nathan Hill, the operator of the vehicle that struck her, was alone in his car and that she and her son had sustained injuries and were going to seek medical treatment. Truitte stated that Progressive assigned claim number #152327659 to Reed's accident. Truitte stated that the claim was processed at the Progressive facility in Plymouth Meeting, PA.
- 4. On 6/13/2015, Philadelphia Police Officer James, badge # 4252, was dispatched and responded to an accident scene on Roosevelt Boulevard at Langdon Street. The time of the accident was 7:23 p.m. The listed drivers on the two-car crash were respectively, Melissa Reed and Nathan Hill. The report did not record any other adult occupants present at the scene of the accident nor did either of the respective drivers inform him of any additional adult occupants.
- 5. On 8/21/2015, Eric Boulware filed a personal injury claim with Progressive for an accident on Reosevelt Boulevard at Langdon Street. The claim was received by Progressive Insurance Company, located at 5165 Campus Drive, Plymouth Meeting, PA 19462. Eric Boulware claimed that he was a front seat passenger in Melissa Reed's vehicle when Reed was involved in a two-car accident. Boulware claimed injuries to his head, neck, shoulder, and back. Boulware submitted medical bills to Progressive for medical treatment dates of 08/10/2015, 8/17/2015, 8/18/2015, 8/19/2015, 8/24/2015 and 8/25/2015 from Dr. William Birch. Truitte stated that Progressive also received medical bills From Dr. Leon Barry for treatment dates of 8/17/2015 and 8/25/2015.
- 6. On 8/21/2015, Progressive Claims Representative Sarah Menzen interviewed Nathan Hill. Hill stated to Progressive that Reed and a small child were the only occupants of Reed's car at the time of the accident on 06/13/2015.
- 7. On 09/15/2015, Truitte called Eric Boulware, and Boulware informed him that Steven Lipshutz, Esq represented him.
- 8. On 9/23/2015, attorney Lipshutz filed a Pennsylvania First Party Benefit Application on behalf of his Client with Progressive Insurance, located at 5165 Campus Drive, Plymouth



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Defendant Name:	First: ERIC	Middle:	Last: BOULWARE

Meeting, PA. Lipshutz alleges that on 06/13/2015, Boulware had been injured as a result of being a passenger in Melissa Reed's Progressive insured BMW.

- 9. Truitte stated that Boulware submitted to Progressive, medical bills for injuries sustained on 6/13/2015 that totaled \$8,310.
- 10. On 12/03/2015, Progressive denied Eric Boulware's PIP claim for non-cooperation in the investigation and no monies were paid.
- D. On 12/14 /2017, your Affiant interviewed Jonathon Beebe, a Claims Adjuster for Allstate Insurance 602 Office Center Drive Fort Washington, PA.
 - 1. Beebe stated that he obtained a recorded phone interview with Allstate's insured driver Nathan Hill on 06/15/2015. In that interview, Nathan Hill stated that he was involved in an auto accident on 06/13/2015 with Melissa Reed. Nathan Hill stated that Reed was the driver and a small 3 or 4-year-old child was the only passenger in Reed's car at the time of the accident.
 - 2. Beebe further stated he obtained a recorded phone interview with Progressive's insured driver Melissa Reed on 06/15/2015. Beebe stated that Reed said that she was involved in an auto accident with Nathan Hill on 06/13/2015. Reed stated that she and her son, Aneeq Boulware, were the only persons in her car at the time of the crash.
- E. On 02/20/2018, your Affiant conducted a PennDOT motor vehicle check on Eric Boulware and found a PA record for Eric Boulware listing his DOB: 04/22/1980 and a social security number.
 - 1. Your Affiant notes that this is the same DOB and Social Security number that Boulware provided on his medical forms, which were submitted to Progressive Insurance.
 - 2. Despite repeated calls to Eric Boulware's listed phone number, as well as visits to his listed residences at 7204 Lynford St Philadelphia. PA 19132 and 5814 N. 6th Philadelphia, PA, 19120 your Affiant, has been unable to contact him.

	DOL	ICE	CRIMINAL	COMPL	AINIT
Section P	POL	.ICE	CKIMINAL	COMPL	I MIA.

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF2016-0033
Defendant Name:	First: ERIC	Middle:	Last: BOULWARE

- F. On 02/12/2018 SA Paolantonio and your Affiant met with Nathan Hill in Norristown, PA. Nathan Hall stated in summary that he was driving his Dodge Stratus on 06/13/2015 on southbound Roosevelt Boulevard at Langdon Street when he was involved in an auto accident with another vehicle operated by Melissa Reed.
 - 1. Nathan Hill stated that he obtained from Melissa Reed her driver's license and vehicle and insurance information. Nathan Hill stated that Melissa Reed was driving and there was a small child in the back seat of her car. Nathan Hill stated that the child was the only passenger in Reed's car at the time of the crash.
- G. On 02/13/2018, SA McGuffin and your Affiant interviewed Melissa Reed DOB: 10/18/1981 at her residence at 6722 Woolston St. Philadelphia, PA.
 - 1. Reed stated that on 06/13/2015 she was driving her 2011 BMW X-3. Reed stated that she was traveling southbound on Roosevelt Boulevard at Langdon Street when she was struck on her driver's side front by a Dodge Stratus operated by Nathan Hill. Reed stated that Hill was alone in his car at the time of the crash and that she had her young son, Aneeq Boulware, in a child seat in the back seat of her car. Reed stated that there were no other passengers in her vehicle at the time of the crash.
 - 2. Melissa Reed was shown a picture of Eric Boulware DOB: 04/22/1980 and Reed stated that she does not know Eric Boulware and he was not in her car at the time of the accident. Your Affiant questioned Reed regarding the father of Aneeq Boulware. Reed stated that Aneeq's father's name is Taom Boulware, DOB: 06/22/1976. Also, Reed stated that she has never heard of any of Taom's family with the name of Eric Boulware.
- H. On 3/28/2018, your affiant interviewed Dr. Leon Barry from Broad St. Chiropractic and learned the following:
 - 1. Dr. Barry provided patient logs from 8/17/2015, 08/18/2015, and 08/19/2015, in which Eric Boulware did sign his name on the log books, and was provided medical treatment. Dr. Barry also provided a patient intake form that Boulware signed and printed his name.

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF2016-0033
Defendant Name:	First: ERIC	Middle:	Last: BOULWARE

- 2. Eric Boulware provided his address of 7204 Lynford St Philadelphia, PA., as well as, his DOB of 04/22/1980 and his social security number. Boulware also provided the date of the accident as 06/13/2015.
- 3. Dr. Barry stated that Eric Boulware was a patient at Broad St. Chiropractic and that Boulware had provided all the accident and personal details as have been previously listed. Your Affiant showed Dr. Leon Barry a photo of Eric Boulware. Dr. Barry positively identified the photo as his patient and the person that provided the accident and personal information for Eric Boulware.
- I. On 03/26/2018, SA Paolantonio and your Affiant interviewed Steven Lipchitz, Esq. at his law office in Philadelphia, PA. Mr. Lipschutz stated that he represented Eric Boulware in a personal injury case stemming from an auto accident, which occurred on 06/13/2015. Lipchitz stated that he terminated Boulware's representation on 02/23/2016.
- J. Based on the foregoing, your Affiant concludes that there is probable cause to believe that Eric Boulware committed the following crimes:

18 PA C.S.A. §4117 (a) (2) Insurance Fraud (F-3)
18 PA C.S.A. §3922 (a) (1) Criminal Attempt Theft by Deception (F-3)

I, PAUL BLASH SPECIAL AGENT, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this

AOPC 412A - Rev. 7/18

day of

20

(Signature of Affiant)

Page of

		Christian	. •=	
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF2016-0033	
Defendant Name:	First: ERIC	Middle:	Last: BOULWARE	
2 21/10	Date Astony	Ljuker -	, Magisterial District Judge	
My commission exp	pires first Monday of Ja	anuary // 302 4	SEAL.	
		•		•

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: BUCKS COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 07-1-01 VS. MDJ: Hon. Michael W. Gallagher (NAME and ADDRESS): LITHGOW Address: 2404 Byberry Road **FELIPE** DANIEL First Name Last Name Gen Bensalem, PA 19020 3806 Bensalem Boulevard Apt. # 118 Bensalem, PA 19020 Telephone: (215)638-1040 NCIC Extradition Code Type ☐ C-Misdemeanor Surrounding States ☐ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition ☐ A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION OTN/LiveScan Number Docket Number Complaint/Incident Number Request Lab Services? ☐ YES ☒ NO -18 10/15/18 -1661-IF-2017-0342 Co-Defendant(s) **GENDER** ров 01/31/1985 Add'I DOB POB Middle Name Last Name Gen. Male Male First Name ☐ Female AKA Unknown Black -RACE White Hispanic ■ Native American Non-Hispanic Unknown ETHNICITY ☐ PLE (Purple) BRO (Brown) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) GRY (Gray) Hair ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) BLK (Black) Color ☐ BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BLK (Black) BLU (Blue) BRO (Brown) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) ☐ YES ☒ NO ☐ DNA Location DNA WEIGHT (lbs.) FBI Number **MNU Number** 175 Ft. HEIGHT In. **Defendant Fingerprinted** Fingerprint Classification: 9 5 DEFENDANT VEHICLE INFORMATION School Veh. Oth. NCIC Veh. Code State Haz Registration Comm'l Veh. Reg. Ind. same as Plate # 21587AF mat PA Sticker (MM/YY) Def. Style Model Color VIN Year Make \boxtimes Sdn 5NPEC4AC3CH446275 2012 Hyundai 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). SDAG M. ERIC SCHOENBERG (Name of the attorney for the Commonwealth) SA STEVEN WALKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) СЛ PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) Tra Tra do hereby state: (check appropriate box) $\stackrel{.}{\Box}$ 1. $\ oxed{oxed}$ 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 therefore designated as John Doe of Jame 2008 with violating the penal laws of the Commonwealth of Pennsylvania at [202] (Subdivision Code) 3806 Bensalem Blvd. Apt. # 169 (Place-Political Subdivision) Bensalem, Pa 19020 on or about OCTOBER 29, 2017, AND CONTINUOUSLY THROUGH in BUCKS County ON OR ABOUT NOVEMBER 15, 2017 (County Code)

	POLICE	CRIMINAL	COMPL	AINT
decouplings.	I OLIOL	OI CHIMITIAN CE	O CHILL E	41141

							COMPLAIN
Docket Numb		te Filed:	OTN/LiveScan Nun	ber	4.00 (ROVERS AND ADDRESS)	plaint/Incident Nu	mber
CR-68	First:	/15/18 X	212861-5 Middle:		Last:	017-0342	
Defendant Na	me: FELI		DANIEL	- 1	LITHGOW		
When there (Set forth a brie without more, is The age of the v	s more than one f summary of the fac not sufficient. In a s ictim at the time of t	offense, each offe ts sufficient to advise t summary case, you mus he offense may be incli	ed below with each Acense should be number the defendant of the nature of structure to the testion of the country of the testion, and the country of the last four digits.	ed chronolo f the offense(s and subsecti ocial security	ogically. s) charged. A on(s) of the st numbers and	citation to the statute tatute(s) or ordinance financial information	e(s) allegedly violated, e(s) allegedly violated.
Inchoate [Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims Age 60 or 0	Older
⊠ #1	4117	(a) (2) o	f the TTTLE 18	1	F-3		
Lead? Offens	e Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT (if applica	Acciden	t Number] Interstate		Safety Zone	☐ Work Zone
thing material to support of a cla	the claim; to wit: do m to GEICO regardir	efendant purchased an	n support of, a claim that cor auto insurance policy from (sely stated that the damage of lated to pay	GEICO Insuran	ice after his ca	ar had already been o	damaged and then, in
Inchoate Offense	Attempt 18 901 A	Solicitation	Conspiracy 18 903		Number of	Victims Age 60 or 0	Older
□ #2	3922	(a)(1) o	f the TITLE 18	1	F-3	10.00 (10.00 to 10.00	
Lead? Offense	# Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT (if applica	Acciden	t Number]	Interstate		Safety Zone	☐ Work Zone
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						ent :	20g (1)
Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Numb	er of Victims	Age 60 or Older	7
□ #3		(a)(1)	of the TITLE 18	1	F-3		o de la companya della companya della companya de la companya della companya dell
Lead? Offer PennDO1		Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Coo	de UCR/NIBRS Code Work Zone
(if applic		mber	or ordinance): UEU AMU			☐ Safety Zone	LI WORK ZORE
Statute Desc	ibriou (iucinae t	ie name or statute	or ordinance): UNLAWI	UL USE OF A	COMPUTER		



Docket Number: CR - 682-18	Date Filed: 10/15/18	X21	TN/LiveScan Number		Complaint/Incident Number IF-2017-0342
Defendant Name:	First: FELIPE		Middle: DANIEL	Last LIT	: HGOW

- 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 $\frac{1}{2}$ through $\frac{1}{2}$.
- 5. 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 that 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.)

issuing authority, and attached.)	
October, 15, 2018	JA HULLASS8
(Date) (Year)	(Signature of Affiant)
AND NOW, on this date \ \O - \S - \8	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.

(Magisterial District Court Number)

(Issuing Authority)

my comm. Exp. 1-3-22

Docket Number: Date Filed: 10/5/8		X 2 12 861-5	cer Complaint/Incident Number IF-2017-0342
Defendant Name:	First:	Middle:	Last:
	FELIPE	DANIEL	LITHGOW

AFFIDAVIT of PROBABLE CAUSE

- A) Your Affiant is Steven Walker, a Special Agent with the Pennsylvania Office of Attorney General (OAG); Bureau of Criminal Investigation (BCI), Insurance Fraud Section. Your Affiant has over 29 years of law enforcement/criminal investigation experience. The facts set forth in this affidavit are based upon review of pertinent documents and/or interviews of witnesses by your Affiant or other agents assigned to the Insurance Fraud Section of the Pennsylvania Office of Attorney General. Your Affiant has participated in hundreds of investigations of, and arrests for, violations of the Pennsylvania Crimes Code and being duly sworn according to law deposes and says the following:
- B) The OAG received an insurance fraud referral from Geico Insurance Company (Geico), Special Investigator Victor Tunis. Tunis alleged that Felipe Daniel Lithgow, with an address of 3806 Bensalem Boulevard, Apartment # 169, Bensalem, PA 19020, filed a claim with Geico on November 8, 2017, stating that his 2012 Hyundai Sonata sustained flood damage after being driven into a large pool of water created by heavy rain. More specifically, Tunis alleged that Lithgow purchased a new Geico policy on November 2, 2017, and then claimed that the water damage to his vehicle occurred on November 7, 2017. Tunis's investigation revealed that the flooding was actually on October 29, 2017, which was prior to Lithgow's policy's inception and when Tunis told Lithgow that he learned when the damage actually occurred, he (Lithgow) withdrew his claim.
- C) In connection with this investigation your Affiant reviewed Geico's claim file and recorded statements. Your Affiant then interviewed Geico Special Investigator Victor Tunis and reviewed the file with him. Based on the review of the file and interview with Tunis, your Affiant learned the following:
 - a. On November 2, 2017, Felipe Lithgow purchased a GEICO insurance policy, policy # 4517028298, online, listing himself as a driver and insuring his 2012 Hyundai Sonata bearing V.I.N. 5NPEC4AC3CH446275.
 - b. On November 8, 2017, at 12:34 PM, Lithgow contacted Geico via their online claims and claimed that his vehicle sustained flood damage on November 7, 2017. Lithgow reported that this damage occurred while he was driving his 2012 Hyundai Sonata in the Village Square Apartment complex located at 1600 Brookwood Drive Bensalem, PA 19020. Lithgow further described how his vehicle sustained damage after he drove through a large pool of water in the parking lot causing flood damage to the vehicle's engine.
 - c. On November 14, 2017, Geico claims representative Angel Rivera forwarded Lithgow's claim to GEICO Special Investigator (SI) Victor Tunis for further investigation because the claimed loss occurred so soon after the policy inception date.
 - d. On November 15, 2017, SI Tunis conducted a recorded interview of Lithgow at his home at 3806 Bensalem Boulevard, Apartment # 169, Bensalem, PA 19020. In summary, Lithgow gave the following statement:

Lithgow claimed that on November 7, 2017, at approximately 8:00 p.m., he was operating his insured vehicle, a 2012 Hyundai Sonata, in the Village Square Apartment complex on Hemlock Court near apartment buildings # 650-651. Lithgow stated that he drove through a large pool of water in the parking lot and roadway area of Hemlock Court that was produced by heavy rain in the area. Lithgow stated that the water in the parking lot was approximately knee high, or about 20 inches deep. He stated that his vehicle began shaking and that the vehicle's engine sustained damage as a result of the flooding. Lithgow confirmed that he purchased the insurance on November 2, 2017, and he stated that his vehicle was operational at the time of policy's inception.

Page Hof Z



Docket Number: Date Filed: 0° CR-682-\8 10 //5//8 X 2		X 2 12 861-5	Complaint/Incident Number
Defendant Name:	First:	Middle:	Last:
	FELIPE	DANIEL	LITHGOW

- e. SI Tunis then went to the loss location at Village Square Apartments, 1600 Brookwood Drive Bensalem, PA, to conduct a canvass of the area that Lithgow alleged the loss occurred. SI Tunis specifically canvassed the area of Units 650-651 Hemlock Court. During this canvass, SI Tunis interviewed apartment resident, Richard Kehoe. Kehoe, who resides at 650 Hemlock Court, stated that the flooding occurred on October 29, 2017. Kehoe also told Tunis that his own vehicle sustained flood damage that day, causing him to file a claim for damage that occurred on October 29, 2017.
- f. On November 15, 2017, SI Tunis conducted a recorded interview of Emily Jordan, who resided at 620 Hemlock Court. Jordan stated that on October 29, 2017, at about 8:00 9:00 PM she came home to find about two feet of water in the parking lot in front of her apartment. She observed cars flooded in the parking and stated it had rained heavily all day that day, Sunday October 29, 2017. Additionally Jordan stated that the next day the parking lot was clear and that the drain had been cleaned out, relieving the flooding. Jordan also showed Tunis a photograph that she took of the flooding and forwarded him a screen shot of that photograph, which Tunis, in turn forwarded to Your Affiant. That screen shot shows that the photograph was taken on October 29, 2017, at 8:55 PM.
- g. After interviewing Kehoe and Jordan, SI Tunis returned to Lithgow's apartment and re-interviewed him. After Tunis told Lithgow that other witnesses said that the flood occurred on October 29, 2017, Lithgow admitted that the flooding did occur on that date and that the damage was, therefore, prior to his policy's inception date of November 2, 2017. Lithgow then withdrew his claim.
- D) On September 18, 2018, SA Richard Weisbrod and your Affiant travelled to Village Square Apartments 1600 Brookwood Drive Bensalem, PA 19020 and conducted an interview of Jean Whiteley, Community Manager for the apartment complex. Your Affiant questioned Whiteley regarding a flooding situation that occurred on their property on October 29, 2017, in the area of Hemlock Court. Whiteley remembered the incident in which heavy rains flooded a portion of Hemlock Court in the apartment complex and caused water damage to several vehicles. She was able to retrieve an email that she sent regarding the insurance information for the property which had been requested by someone visiting a resident of the complex. On the email, which is dated Monday October 30, 2017, at 12:08 PM, she references the flooding that occurred "yesterday". Your Affiant questioned Whiteley about this email and she confirmed that the flooding occurred on Sunday October 29, 2017.

Additionally, Whiteley provided a copy of correspondence from The Hartford Eastern Insurance Office, which insured another car owner whose car was damaged in the flooding at Village Square Apartments. This letter was received in regard to a claim that was filed by a tenant of the apartment complex regarding flood damage on October 29, 2017, in which Village Square Apartments agreed to cover the tenant's insurance deductible.

E) On September 18, 2018, SA Richard Weisbrod and your Affiant conducted an interview of Richard Kehoe, resident of 650 Hemlock Court. Kehoe stated that his 2009 Hyundai Sonata was damaged in the flood on Sunday October 29, 2017, as it was parked in the parking lot at his residence. Kehoe stated that he went outside around 9:00 PM after he noticed flashing lights in the parking lot. Kehoe recalled it had been raining all day and that when he went toward the lot he observed it was flooded and his car was under water up to the middle of the doors. He also observed that other cars at the site of the flood were damaged. Kehoe was asked if he recalled any other time when Hemlock Court was flooded and he stated, "No" and further added that while the road was flooded on October 29, 2017, someone from the apartment complex arrived and was

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Docket Number: Date Filed: X		X2°	TN/LiveScan Number		Complaint/Incident Number IF-2017-0342		
	First:		Middle:	Las	st:		
Defendant Name:	FELIPE		DANIEL	LI	THGOW		

wearing waders and went into the water and cleared the two drains on either side of the road. He then stated that there was no additional flooding since the drains were cleared that day.

- F) On September 20, 2018, your Affiant did an internet search of the National Oceanic & Atmospheric Administration (NOAA) historical weather data for the dates between October 22, 2017, and November 11, 2017, in the Bensalem, Pennsylvania zip code. The Record of Climatological Observations record showed there to be a significant amount of rain on October 29, 2017, into October 30, 2017, (4 + inches), no significant rain accumulation (< .5 inches) for the rest of the period, and no rain whatsoever on November 7, 2017.
- G) Your Affiant reviewed the Geico claim file and related investigation and discovered that due to the claim filed by Lithgow, his 2012 Hyundai Sonata was determined to have sustained flood damage to the engine causing a total loss. The replacement value set by Geico for the loss to Lithgow's 2012 Hyundai Sonata was \$9,506.93.
- H) Based on the foregoing, probable cause exists to establish that the following crimes have been committed by Felipe Daniel Lithgow:

18 Pa.C.S.A. §4117(a)(2) Insurance Fraud [F-3]

18 Pa.C.S.A. §901 / 3922(a)(1) Criminal Attempt / Theft by Deception [F-3]

18 Pa.C.S.A. §7611(a)(1) Unlawful Use of a Computer [F3]

2018 BC 1.5 AM 10: 16

I, SA STEVEN WALKER, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

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		100	POLICE CRIMINAL COMPLAINT
Docket Number: CR-682-18	Date Filed:	X2\286 [-5	Complaint/Incident Number IF-2017-0342
Defendant Name:	First: FELIPE	Middle: DANIEL	Last: LITHGOW
		15th St	(Signature of Affiant)
Sworn to me and sub	oscribed before r	ne this day of	1000 2018
10-15-18 Da	ate	Malel	, Magisterial District Judge
My commission expir	res first Monday	of January, 2022	SEAL

TO BOOK TO THE DESTRUCTION OF THE PERSON OF

COMMONWEALTH OF PENN COUNTY OF: CHESTER Magisterial District Number: 15-2-01 MDJ: Hon Joann L. Teyral Address: 347 Bridge Street Phoenixville, PA 19460	DEFEN GILDAI First Nan	CON NDANT: RDO	MONWEALTH	NAL COMPLA I OF PENNSYLVA VS. and ADDRESS): TRUJILLO ANA Last Name	ANIA
Telephone: (610)935-1503	1	, PA 19363			
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Docket Number 3-18 Date F	Tied OTN/LiveScan Numb		plaint/Incident Num		ab Services? ⊠ NO
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		x 31			
(The attorney for the Commonwealth may filling, See Pa.R.Crim.P. 507). ROBERT LABAR, SENIOR DEPUTY (Name of the attorney for the Commonwealth)	AG Mar	rant affidavit, or both bi			(Date)
I, TIMOTHY BARRAR, SPECIA (Name of the Affiant)	AL AGENT	BADGE # (PSP/MF	565 POETC -Assigned Af	flant ID Number & Badge	e #
of Pennsylvania Office of (Identity Department or Agency Repress do hereby state: (check appropriate & I accuse the above named of the control of the above named of	ented and Political Subdivision) riate box) defendant who lives at the ad	(Police A	222400 vgency ORI Number) ove	## BE	નેલ
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☐ I accuse the defendant who therefore designated as Joh with violating the penal laws 19355 (Charlestown Township)	n Doe or Jane Doe	nsvivania at I2021	71. Ge	neral Wairen Blvd N	Acres 100
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F			POLICE CRIMINAL COMPLAINT
Docket Number: CR 273-18	Date Filed: 10 17/18	OTN/LiveScan Number	Complaint/Incident Number JF-2018-0193
Døfendant Name:	First: GILDARDO	Middle: T	Last: TRUJILLO ANAYA
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be listed	. If the id	lentity of an account	must be established, i	list only the last four digits,	204. PA, Code:	§§. 213.1 – 273.7.)	
Inchea Offens		Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number of Victims Age 60 or	Older
\boxtimes	1	4117	(a)(2) at	the TITLE 18	1	F-3	
Ľead?	Offense	Section	Subsection	PA Statute (Tille)	Counts.	Grade NCIC Offense Gode	UCR/NIBRS Code.
	nDOT E pplicat		Number		Interstate	☐ Safety Zone	☐ Work Zone
Statute	Descr	iption (include th	e name of statute:	or ordinance): INSURA	NCE FRAUD		9
Insuance or mislea in an atte	Compar ding Info	iles, present or cause irmation concerning have Progressive Gro	e to be presented to hi a fact or thing materia iup of Insurance Comp	is insurer a statement formi	ng a part of, or Int made at lea s, which Proge	nd with the intent to defraud Pro in support of, a claim which cor st one materially false, incomplet ssive Insurance was not obligate 1 July 14, 2018.	itained false, incomplete e or misleading statement
Inchoa Offens		Attempt 18-901 A	Solicitation 18 902 A	Conspiracy		Number of Victims Age 60 or	Older
	2	4117	(b)(4)	the TITLE 18		M1	
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	nDOT E pplicat		Number		interstate	Safety Zone	☐ Work Zone:
			e name of statute	or ordinance); INSURA	NCE FRAUD		<i>y</i>
Compani thereto:	es, filed	an application for ins	urance containing false	e and concealed information misleading information in a	i for the purpos	with the intent to defraud Progres se of misleading the insurer cond olication submitted to Progressive	erning a fact material
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	3 Offens		(a)(1)	TITLE 18 FA Statute (Title)	Counts	F3 Grade NGIC Offense Co	de UCR/NIBRS Code
	nDOT apilga	Data Accid	ent	7,700,000 (1110)	[] Interstate	☐ Safety Zone	☐ Work Zone
:Statute	Descri			or ordinance): CRIMINA	L ATTEMPT T	HEFT BY DECEPTION	
constitute	d a subs	tantial step toward to	he commission of said essive Group of Insura	crime, to wit: Gildardo Truj nce Companies pay insuran	illo Anaya madê ce benefits in e	nt to commit Theft by Deception, a at least one materially false, inc excess of \$2,000, which Progress 29, 2018 and his subsequent ins	ve Group of Insurance

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					POL	ICE CRIMINAL	
Docket Numb	er: Date 10 /	Filed:	OTN/LiveScan			Complaint/Incident Nu IF-2018-0193	mber
Defendant Na	First	ARDO.	Middle: T		Last: TRU	JILLO ANAYA	,
		* * *	į.		ū.		
Inchoate Offense	Attempt 18:901 A	Solicitation	Conspiracy 18 903	Num	iber of V	ictims Age 60 or Older	
□ [4/	7512		arthe TITLE 18 PA Statute (T	Itle) Count	F3	Srade NCIC Offense Code	UCR/NIBRS Code
Lead? Offens PennDOT (if applica	Data Accide		F.A Signific P.Y	Intersta		Safety Zone	☐ Work Zone
Statute Descr			or ordinance): CRIM	vinal use of	COMMI	UNICATION FACILITY	
cause, or facilital	te the commission or	the attempt thereof of	a crime which constitut nent in connection with	tes a felony, ton an auto insuran	wit: Trujil ice claim	facility, a telephone or cellph llo Anaya used a telephone o with Progressive Group of In ecifically, Insurance Fraud,	r celibrobé to maké
Inchoate Offense	☐ Attempt 18.901 A	Solicitation 18 902 A	Conspiracy 18 903	Nun	nber of \	Victims Age 60 or Older	
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he reported to la	w enforcement authors to the Pengsy	offices an officese or oth Ivania State Police on N	per incident within their	concern knowing that he hadn't hi	ig that it o ad posses	se information to a law enfor did not occur. To wit; Trufillo ssion of the vehicle since of D	a Anaya reported his
inchoate Offense	☐ Attempt 18-901 A	Solicitation 18 902 A	Conspiracy 18.903	Nun	nber of V	/latims Age 60 or Older	
		<u> </u>	of the PA Statute (Tille): Coun	de (Grade NCIC Offense Code	UCR/NIBRS Code
Lead? Offer PennDOT (if applic	Data Accid	iber		Intersta		Safety Zone	[] Wark Zone
Statute Descr	iption (include the	e name of statute of	or ordinance):		11		

Acts of the accused associated with this Offense:

			POLICE CRIMINAL COMPLAINT
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR273-18	10/11/18	0638823-3	[IF-2018-0193
0,,=,0 .0	First:	Middle:	Last:
Defendant Name:	GILDARDO	T	TRUJILLO ANAYA

- 2. Lask 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 unsworm falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered 1 through _____
- 5. 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 that 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.)

(Near)	(Significant of Afflicit)
(izele)	I certify that the complaint has been properly completed and verified.
And NOW, on this date Arr affidavit of probable cause must be completed before a war	
Au autosauroi bronabie dades urinist ne combieren narote a wer	
	76.9//
(MagIsterial District Court Number) (Issuit	g Authority)
(wagistalia pishlot obali valino)	SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: MONTGOMERY **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 38-1-23 VS. (NAME and ADDRESS): MDJ: Hon. Deborah A. Lukens NAHDI Address: 4002 Center Avenue **HASSAN** First Name Middle Name -Last Name Gen Lavfavette Hill.PA, 19444 2222 Smithbridge Road Coatesville, PA 19320 Telephone: (610)828-5226 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition ☐ A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Complaint/Incident Number Request Lab Services? Docket Number OTN/LiveScan Number Date Filed CR-124 ☐ YES 🖾 NO IF-2017-0341 Co-Defendant(s) **GENDER** ров 12/28/1976 Add'I DOB POB Male Male First Name Middle Name Last Name Gen ☐ Female AKA White ■ RACE Black Native American Unknown Asian **ETHNICITY** Hispanic Non-Hispanic ■ Unknown BLU (Blue) PLE (Purple) BRO (Brown) SDY (Sandy) GRY (Gray) RED (Red/Aubn.) Hair XXX (Unk./Bald) GRN (Green) PNK (Pink) BLK (Black) ONG (Orange) WHI (White) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) MUL (Multicolored) **DNA Location** DNA ☐ YES ⊠ NO WEIGHT (lbs.) FBI Number 204171VB3 **MNU Number** 165 Ft. HEIGHT In. ☐ YES ☐ NO **Defendant Fingerprinted** Fingerprint Classification: DEFENDANT VEHICLE INFORMATION State Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Haz Reg. Ind. same as mat Plate # Sticker (MM/YY) Def. Model VIN Year Make Style Color Office of the attorney for the Commonwealth \(\subseteq \text{Approved} \) 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). SDAG KENNETH MCDANIELS (Name of the attorney for the Commonwealth) SPECIAL AGENT PAUL BLASH 711765 BADGE#535 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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

on or about 11/06/2017 AND 11/03/17

in MONTGOMERY County

Meeting Pa 19462

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [107]

(County Code)

[46]

5165 Campus Drive Plymouth

(Subdivision Code) (Place-Political Subdivision)



Docket Number:	Date Filed:	OTN/LiveScan N			aint/incident Numb			
Docket Number.	/ /	O I WESCAR IN	umber	, .	17-0341			
	First:	Middle:	L	ast:				
Defendant Name:	HASSAN		1	IAHDI				
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 <i>brief</i> summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A cliation 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. 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	☐ Solicitation 18 902 A	Conspiracy 18 903		Number of V	ictims Age 60 or Olde	er		
☑ 1 4117	(2)(2)	of the TITLE 18	1	F-3				
Offense	(a)(2) ection Subsection	PA Statute (Titl		Grade	NCIC Offense	JCR/NIBRS Code		
# PennDOT Data			☐ Interstate		Code Safety Zone	☐ Work Zone		
(if applicable)	Accident Number	to or ordinance): 40 Da						
j Statute Description (Inc	clude the name of statu	ne or ordinance): 18 PA	9411/ (A	-2 JINGUKAN	ICE FRAUD (F-3)			
thing material to a claim, to	atement forming a part of, or wit: The defendant, made at venefits, which Progressive w	least one materially false, in	ncomplete or misle	eading stateme	ent in order to cause Pr	ogressive Insurance		
Inchoate ⊠ Attem Offense 18 901		Conspiracy 18 903	Numbe	er of Victims A	ge 60 or Older	and the second s		
□ 2 392	2 (a)(1)	of the TITLE 18	1	F-3				
Lead? Offense#	Section Subsection	PA Statute (T	itle) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident — — — — — — — — — — — — — — — — — — —		☐ Interstate		Safety Zone	☐ Work Zone		
	clude the name of statu	te or ordinance): 18 PA	.C.S.A §3922(A)	(1) CRIMIN	AL ATTEMPT THEFT	BY DECEPTION		
Acts of the accused associated with this Offense: The defendant did, with the intent to commit Theft by Deception, 18 Pa. C.S.A. § 3922(a), commit an act which constituted a substantial step toward the commission of said crime, to wit: defendant made at least one materially false, incomplete or misleading statement in order to cause Progressive Insurance Company to pay insurance benefits in excess of \$2,000, which Progressive was not obligated to pay, in connection with damage to an auto that occurred on November 2, 2017.								
PI	59/11/10							
Inchoate Attem Offense 18 901	•	Conspiracy 18 903	Numbe	er of Victims A	\ge 60 or Older			
□ 3 751	.2 (a)	of the TITLE 18	1	F-3				
Lead? Offense# PennDOT Data	Section Subsection Accident	PA Statute (T		Grade	NCIC Offense Code	UCR/NIBRS Code		
(if applicable)	Number ———		Interstate		Safety Zone	☐ Work Zone		
Statute Description (in (F3)	clude the name of statu	ite or ordinance): 18 PA	\. C.S.A. §7512(A) CRIMINAL	. USE OF COMMUNIC	CATION FACILITY		
facilitate the commission or to make at least one false, i	ssociated with this Offer the attempt thereof of a crim incomplete or otherwise misle used, or facilitated the commi	ne which constitutes a felony eading statement in connecti	, to wit: On Nove on with an auto ir	mber 6, 2017, Isurance claim	defendant used a telep with Progressive Insur	phone or cellphone ance Company and,		



•			
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2017-0341
	First:	Middle:	Last:
Defendant Name:	HASSAN	****	NAHDI

- 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 $\underline{7}$.
- 5. 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 that 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.)

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

(Date)

(Date)

(Date)

(Date)

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.

(Magisterial District Court Number)

(Issuing Authority)

(Issuing Authority)

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2017-0341	
	First:	Middle:	Last:	
Defendant Name:	HASSAN		NAHDI	

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant is Special Agent Paul Blash of the Insurance Fraud Section of the Pennsylvania Office of Attorney General. Your Affiant has thirty two years of law enforcement/investigative experience. Your Affiant has participated in hundreds of investigations and arrests for violations of the Pennsylvania Crimes Code. Being duly sworn according to law, your Affiant deposes and says:
- B. Your Affiant was assigned to investigate an allegation of insurance fraud regarding false and misleading information provided by Hassan Nahdi to Progressive Insurance Company, (Progressive). Nahdi added collision coverage on 11/2/2017, at 12:47 p.m., after he was involved in a three-vehicle accident. Progressive records show Nahdi called Progressive on 11/03/2017 to report the accident. In his claim, Nahdi stated the crash occurred on 11/02/2017, between 1:00 p.m. and 2:00 p.m. after the collision coverage was added. This case was referred to the Pennsylvania Office of Attorney General by Robin Seagreaves, special investigator for Progressive Insurance. Based on the following affidavit there is probable cause to believe Hassan Nahdi committed the crimes of Insurance Fraud, Criminal Use of a Communication Facility and Criminal Attempt Theft by Deception.
- C. On 06/28/2018, your Affiant reviewed the Progressive claim file and interviewed Robin Seagreaves from Progressive Insurance Special Investigations Unit. Based on this, your Affiant learned the following:
 - 1. Hassan Nahdi, DOB: 12/28/1976, owner of Salma Transport Company located at 2222 Smithbridge Road Coatesville, PA 19320 had an existing auto insurance policy, but with no collision coverage. The policy insured his 2005 Freightliner bearing vehicle identification number 1FUJBBCK25LU83884, with a PA registration of AG-25821. Nahdi's Progressive policy number was 03812729-1, with the effective dates of 07/07/2017 through 07/07/2018.
 - 2. On 11/02/2017 at 12:47 p.m., Nahdi called Progressive Insurance and in a recorded statement made a change to his auto insurance policy. Nahdi added collision coverage to his policy.
 - 3. On 11/03/2017, Nahdi reported a vehicle damage claim to Progressive. In a recorded statement to Progressive, Nahdi stated that he had been in an accident while operating his 2005 Freightliner. Nahdi told Progressive that he was involved in a three-vehicle crash on 11/02/2017, between 1:00 p.m. and 2:00 p.m. Nahdi gave the location of the accident as eastbound Pennsylvania Turnpike. Progressive assessed the amount of damage to Hassan Nahdi's truck at \$9,000 and assigned claim number 172760142.
 - 4. Progressive Insurance obtained a copy of Pennsylvania State Police accident report number PA 2017-1175167. This report documents the time of the accident at 12:41 p.m. on 11/02/2017 and occurring on the Pennsylvania Turnpike, eastbound at mile marker 242.
 - 5. On 11/06/2017, Progressive Insurance representative Gene Kuper interviewed Hassan Nahdi from his office by telephone, at 5165 Campus Drive, Plymouth Meeting PA 19462. Nahdi stated to Kuper that the accident occurred on 11/02/2017. Kuper then asked Nahdi what time did the accident happen? Nahdi's answer was "Around 2 p.m." Also, Nahdi told Kuper that the crash occurred after the collision coverage was added.
 - D. On 07/27/2018, your Affiant interviewed Trooper Caleb Semsel, Badge #10244, at his headquarters in Denver, PA. Semsel stated that he was dispatched to this accident at 12:41 p.m. and estimated the crash occurred a few



Docket Number:	Date Filed:	OTN/LiveScan Numbe	r Complaint/Incident Number IF-2017-0341
Defendant Name:	First:	Middle:	Last:
Defendant Name:	HASSAN		NAHDI

minutes before 12:41p.m. The crash involved three vehicles. The operators of the other two cars involved in the accident with Nahdi were identified as Stanley Boal and Joseph Kloss. As a result of the crash, both Nahdi and Boal received traffic citations. These citations show 12:41 p.m. as the time the violations occurred.

- E. On 07/30/2018, your Affiant obtained from Pennsylvania State Police, a copy of the computer-aided dispatch report (CAD) report for accident report PA2017-1175167. This report was provided to me by Corporal Louis Robinson. Your Affiant reviewed the CAD report. The report documents that Trooper Semsel arrived at the crash scene at 12:45 p.m. on 11/02/2017.
- F. On 07/31/2018, your Affiant contacted Stanley Boal. Boal confirmed that he was involved in the accident with Hassan Nahdi and Joseph Kloss. Boal acknowledged he had obtained a copy of crash report PA 2017-1175167 and had reviewed it. Boal confirmed the crash occurred on 11/02/2017 at 12:41 p.m.
- G. On 08/01/2018, your Affiant contacted Joseph Kloss. Kloss stated that he was involved in a motor vehicle accident on 11/02/2017 at 12:41 p.m. Kloss obtained a copy of accident report number PA2017-1175167. Kloss reviewed the report and said the report was accurate.
- H. On 08/07/2018, your Affiant met with Hassan Nahdi at his residence at 2222 Smithbridge Rd. Coatesville, PA. Nahdi declined to be interviewed.
- I. Based on the foregoing, your Affiant concludes that probable cause exists that Hassan Nahdi committed the following crimes:

18 PA C.S.A. §4117 (a) (2) Insurance Fraud (F-3)

18 PA C.S.A. §3922 (a) (1) Criminal Attempt / Theft by Deception (F-3)

18 PA. C.S.A. §7512(a) Criminal Use of Communication Facility (F3)

I, SPECIAL AGENT PAUL BLASH, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

			PULICE	CKIMINAL CO	MILFWIIA
Docket Number:	Date Filed:	OTN/LiveScan Number		olaint/Incident Number 017-0341	
Defendant Name:	First: HASSAN	Middle:	Last: NAHDI		
2016 Da	oscribed before me thate res first Monday of J	Soral Jakes	Pepte.	Signature of Affiant) Sterial District Judge SEAL	

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DELAWARE COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 32-1-36 VS. (NAME and ADDRESS): DEFENDANT: MDJ: Hon, David R. Griffin SAHOO Address: 526 W. Ridge Road Jayadev Gen Middle Name Leal Name First Name Linwood, PA 19061 3855 Blair Mill Road Apt. 235 C Horsham, PA 19044 Telephone: (610)859-9748 NGIO Extradition Gode Type ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States 1-Falony Full ☐ Distence ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 2-Felony Limited ☐ E-Misdemeanor Pending Extradition ☑ 3-Felony Surrounding States A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition ■ B-Misdemeanor Limited 4-Felony No Extradition **※単独のEFENDANT DENTIFICATION INFORMATION 注意場合** CompleinVincident Number Request Lab Services? OTN/LiveScan Number ☐ YES 図 NO IF2017-0349 Co Defendant(=) DUD 04/08/1982 Adul DOB BENDER Gen. Male 🔀 Middle Name Last Name First Name ☐ Female AKA Bleck Native American **⊠** White RACE Aslan Unknown ETHNICITY Hispanic Singelii-non BRO (Brown) BLV (Blue) PLE (Purple) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) Hair PNK (Pink) XXX (Unk,/Beld) ☐ ORN (Green) BLK (Black) ONG (Orange) ☐ WHI (White) Color BLN (Blonde / Strawberry) 🔀 BRÓ (Brown) DEU (Blue) GRN (Green) GRY (Gray) BLK (Black) Еу¢ PNK (Pink) ☐ XXX (Unknown) HAZ (Hazel) MAR (Maroon) MUL (Multicolored) Color WEIGHT (Ibs.) ☐ YES ☐ NO **DNA Location** DNA FBI Number MNU Number 160 Ft. HEIGHT In. YES INO Defendant Fingerprinted 5 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Comm'l Veh. School Veh. Oth, NCIC Veh. Code Reg. State Registration Haz \$8 **6**(06\$ ind. Plate #JNZ5238 mat PA Sticker (MM/YY) Def. VIN Make Model Style Color \boxtimes Sdn Silver 2014 Buick Regal 2G4GN5EX5E9184279 Office of the attorney for the Commonwealth. Approved. Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant afficient, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG KENNETH MCDANIELS (Signature of the allomey for the Commonwaelth) (Name of the attorney for the Commonwealth) (Date) SA STEVEN WALKER (PSP/MPOETC -Assigned Afflant ID Number & Badge # (Name of the Afflant) PA0222400 Pennsylvania Office of Attorney General (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 [101] 2550 Market Street (Place-Political Subdivision) Acton, Pa 19014 on or about OCTOBER 20, 2017 TO NOVEMBER 1, 2017 in DELAWARE County [23] (County Code) Page 1 of 3 40PC 412A - Rev. 7/18 Oct. 3,2018 DISTRICT COURT 32-1-36 7:10PM 7945 .oN October 3, 2018 at 2;11;26 PM EDT Received 504 TSZ66S80T9 SBOAY DURATION KEWOLE CRID

INBOUND NOTIFICATION : FAX RECEIVED SUCCESSFULLY

POLICE CRIMINAL COMPLAINT
Complaint/Incident Number

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Lead7	Offense#	Section	Subsec	:lioti	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
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Statut	e Descri	otion (include	the name of	f statute or ord	linance): CRI	MXNAL	ATTEMPT /	THEFT BY	DECEPTION	
Acts of the accused associated with this Offense: The defendant did, with the intent to commit Theft by Deception, 18 Pa.C.S.A. §3922(a), commit an act which constituted a substantial step toward the commission of said crime, to wit: defendant made at least one materially false, incomplete or misleading statement in order to cause Geico Insurance Company to pay insurance benefits in excess of \$200, which Geico Insurance Company was not obligated to pay, in connection with an auto accident that occurred on October 20, 2017.										
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Defendant Name:	JAYADEV			SAH	00

- 2. I ask that a warrant of arrest or a summore be issued and that the defendant be required to enswer 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 unsworm falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.
- 5. 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 that non-confidential information and documents.

of Pennsylvania and we	re contrary to the rest can be lss:	Act(s) of the As	ter, were against the peace and dignity of the sembly, or in violation of the statutes cited. t of probable cause must be completed, sw	
(Date)		(Year)	Signature (Signature	4558 of Afflant)
AND NOW, on this date	2,00	2018	I certify that the complaint has been properly cor	npleted and verified.
An affidavil of probable ca	use must be comp	eted before a war	rant can be Issued.	
32-7-3 (Magisterial District Court		(डिडेपी	ig Authority)	SEAL

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AFFIDAVIT of PROBABLE CAUSE

- A) Your Affiant is Steven Walker, a Special Agent with the Pennsylvania Office of Attorney General (OAG); Bureau of Criminal Investigation (BCI), Insurance Fraud Section. Your Affiant has over 29 years of law enforcement/criminal investigation experience. The facts set forth in this affidavit are based upon review of pertinent documents and/or interviews of witnesses by your Affiant or other agents assigned to the Insurance Fraud Section of the Pennsylvania Office of Attorney General. Your Affiant has participated in hundreds of Investigations of and arrests for, violations of the Pennsylvania Crimes Code and being duly sworn according to law deposes and says the following:
- B) The OAG insurance Fraud Section received an insurance fraud referral from Geico Insurance Company Special Investigator (SI) Tracy Flick. SI Flick alleges that Jayadev Sahoo, DOB 04/08/1982, residing at 3855 Blair Mill Road Apt. 235 C Horsham, PA 19044, committed Insurance Fraud and Attempted Theft. On October 20, 2017 at 6:58 p.m. Sahoo filed a claim for auto collision damage with Geico Insurance Company related to an accident he was involved in on that same day at approximately 5:51 p.m. The accident occurred on SR476 North at mile post 17.8 Plymouth Meeting, PA. During this claim, Sahoo stated that his 2014 Buick Regal was struck in the rear and pushed into the vehicle in front of him. Sahoo stated the car in front of him left the scene and he did not obtain any information from the operator or any description of his vehicle. SI Flick alleges that their investigation showed that the damage to the front end of Sahoo's Buick Regal is old damage and was photographed by one of their claims appraisers at a prior claims adjustment, for vandalism, on August 12, 2017.
- C) In connection with this Investigation, your Afflant reviewed the Geico Insurance Company claim and file notes, recorded statements and conducted Interviews. On May 5, 2018, your Afflant interviewed SI Tracy Flick and learned the following:
 - a) Jayadev Sahoo purchased Gelco Insurance Auto Policy # 4431078999 with an effective policy period of September 11, 2017, through March 11, 2018. Jayadev Sahoo was listed as a driver on the policy and a 2014 Buick Regal bearing VIN: 2G4GN5EX5E9184279 was covered on the policy.
 - b) On October 20, 2017, Sahoo filed a claim with Geico Insurance, claim # 0557689080101022-01, regarding a crash he was involved in on SR476 North in the area of mile post 17:8, Plymouth Meeting, Pennsylvania. Sahoo reported he was travelling northbound in heavy traffic when he was rear-ended by a 2014 Nissan Rogue driven by Bally Bourgeois. Sahoo also alleged he struck the vehicle in front of him causing damage to his front grill and license plate holder, however, the driver left the scene before providing any information.
 - c) On November 4, 2017, Sahoo took his 2014 Buick Regal to 3D Collision at 1029 Conshohocken Road, Conshohocken, PA 19428 to have an estimate prepared for the damages he alleged had occurred during this crash. Geico Claims Appraiser, Mackenzie Ensley, prepared the estimate including pictures of the damage. Total estimate was \$1,719.03 minus Sahoo's deductible of \$500.00, for a total net cost of repairs of \$1,219.03.
 - d) After the estimate was prepared, Geico discovered the front damage was the same as a previous claim for which an estimate was written on August 12, 2017. The August 12, 2017, claim was reported as vandalism. The Gelco claim file number was # 0557689080101014-01. During the estimate for the vandalism claim, the appraiser, Kevin Godfrey, had noted and photographed damage on the front bumper and license plate holder of Sahoo's vehicle.

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- o) The front bumper and lleenee plate holder damages were denied in this current loss as being old, pre-existing collision damage and related to the estimate prepared on August 12, 2017. Geico Insurance Company then referred this complaint to the OAG for investigation of Insurance Fraud.
- D) Your Afflant performed the following investigative steps:
 - a) Your Affiant reviewed the recorded statement Sahoo provided to Gelco Insurance Company, on November 1, 2017, at 12:01 p.m. During the recorded statement Sahoo was asked where he was at the time of the statement, and he stated he was "at work at 2550 Market Street Aston, PA." Sahoo went on to describe the events of the accident including reporting the damage to the front grill and license plate area as well as the damage to the rear of his vehicle related to this claim.
 - b) On May 10, 2018, your Afflant met with claims adjuster Mackenzle Ensley about the estimate he prepared for Jayadev Sahoo on November 4, 2017, regarding claim # 0557689080101022-01. Ensley provided a statement and identified several pictures that were taken as part of the claims adjustment process. Ensley gave the opinion that the pictures that were taken on August 12, 2017, by Gelco Claims Adjuster Kevin Godfrey showed the same damage to Sahoo's Buick Regal as the pictures he had taken as part of his claim process on November 4, 2017. In conclusion, Mackenzie is of the opinion that the damage claimed by Sahoo related to the accident on October 20, 2017, was the same damage that was noted at the earlier appraisal on August 12, 2017, by Kevin Godfrey.
 - c) On May 24, 2018, your Affiant traveled to Kennedy Ford Collison Center 1130 York Road Willow Grove, PA, and conducted an interview with Geico Claims Adjuster Kevin Godfrey. Godfrey stated that on August 12, 2017, he had prepared an estimate for Jayadev Sahoo regarding a vandalism claim he filed for damage to his 2014 Bulck Regal, Gelco claim file # 00557689080101014-01. During the claims process, Godfrey observed damage to the front bumper and Ilcense plate area of Sahoo's Bulck and determined that it was collision damage and not vandalism related to the claim for which he was preparing the estimate. Godfrey took pictures and notified Sahoo that the damage was unrelated to the vandalism claim he was reporting. As part of the interview, your Affiant asked Godfrey to examine photographs he had taken of the collision damage on August 12, 2017, and compare them to pictures that Geico claims adjuster Mackenzie Ensley had taken on November 4, 2017. Godfrey gave the opinion that the damages he photographed on Sahoo's vehicle on August 12, 2017, were the same as the damages Ensley had photographed on Sahoo's vehicle on November 4, 2017.
 - d) On June 14, 2018, SA Wacker and your Affiant traveled to 3855 Blair Mill Road, Apt. 235 C, Horsham, PA 19044 and interviewed Jayadev Sahoo. Your Affiant advised Sahoo of the investigation and asked if he would willingly provide a statement related to his actions regarding the insurance claim he filed with Geico Insurance on October 20, 2017. Sahoo agreed to be Interviewed, and your affiant took a statement from him related to the collision claim he filed. During the interview, Sahoo acknowledged he filed a claim with his insurance company (Geico) after he was involved in an accident on SR476 in Plymouth Meeting, PA, on October 20, 2017. Additionally, Sahoo confirmed to have an estimate prepared for the damages and that he provided Geico Insurance with a recorded statement describing the events of the accident.

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- e) Additionally, during the interview your affiant asked Sahoo, "Specifically, what damage did you report was from the accident?" and he replied, "The back end dent on number plate and additional dent to the front bumper." After Sahoo reviewed the statement he requested that this question be amended, and he provided the following addendum: "At the time of appraisal, I didn't put the front damage. It was reported at the recorded statement." Sahoo wrote and signed this response to have it included in his statement. Later, the same day, your Afflant received an email from Sahoo in which he admitted that he did tell the appraiser to consider the front damage.
- f) On August 20, 2018 your Affiant received a copy of The General Insurance Company's file related to this accident, claim # PA0002262424. The General insures Bailey Bourgeois, the operator of the striking vehicle.
- g) On October 23, 2017 at 3:09 p.m., Jayadev Sahoo provided The General Insurance with a recorded statement of the events involving this accident. In reviewing the recorded statement, your affiant heard Sahoo again claim that the front grill and license plate area of his vehicle was damaged during this accident. Sahoo stated that his vehicle sustained a "small crack" on the front grill after he was pushed into the car in front of him from the impact of being struck by Bourgeois' vehicle.
- h) Based on the foregoing communications, as corroborated by your Affiant's investigation, Sahoo three times claimed the pre-existing damage: once during the claim call to his insurance company, Geico Insurance, on October 20, 2017; once during the claims appraisal being prepared by Mackenzie Ensley after the accident occurred; and lastly when he provided the recorded statement to The General Insurance Company as part of their claims process to repair his vehicle. All three attempts to have the front grill damage repaired occurred after the first appraisal when, on August 12, 2017, Sahoo was advised by claims adjuster Kevin Godfrey of the old, pre-existing collision damage.
- Additionally, Sahoo sent your Affiant copies of the estimate summary pages that were prepared by the claims adjuster for the other party's insurance company, The General Insurance. This appraisal shows the Initial claim for the front end damage and repairs.
- j) Your Afflant requested that OAG Special Agent Richard Weisbrod examine the photographs related to this claim. SA Richard Weisbrod is a trained Collision Reconstructionist. He has received over 1,100 hours in specialized collision investigation training and has investigated over 3,000 collisions, including fatal, serious injury, and hit and run collisions, which required analysis and comparison of damage that vehicles had sustained during the collisions. He has been recognized as an expert in the field of collision investigation for purposes of testifying in Tempe, Arizona City Court, Bucks County District Court, and Bucks County Court of Common Pleas.

As part of the investigation of this case, Weisbrod examined damage to the 2014 Buick Regal as shown in the photographs taken by Gelco Insurance on 08/12/2017 and 11/04/2017. It is SA Richard Weslbrod's conclusion that all of the damage to the car's front grille, front bumper cover, and front

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photos taken on 11/04/2017. E) Based on the foregoing, your Affiant believes probable cause exists that the following crimes have been committed by Jayadev Sahoo: 18 Pa. C.S.A. § 4117 (a) (2) Insurance Fraud (F-3) 18 Pa. C.S.A. § 901/3922 (a) Criminal Attempt / Theft by Deception (M-1) 18 Pa. C.S.A. § 7512 (a) Criminal Use of Communication Facility (F-3) SA STEVEN WALKER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS ET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, IFORMATION AND BELIEF. CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS OLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS. IFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS. (Signalure of Affiant) Worm to me and subscribed before me this 2 day of 0 CT 2048 Date	ëfendant Name:	A.O	Middle:	Lest:
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COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: PHILADELPHIA COMMONWEALTH OF PENNSYLVANIA VS. Magisterial District Number: (NAME and ADDRESS): MDJ: Hon. Address: 1301 FILBERT ST JERMOND HARPER Middle Name First Name Last Name Gen PHLIADELPHIA, PA., 19107 700 FARMINGTON AVENUE A2 POTTSTOWN PA.19464 Telephone: (215)683-7283 NCIC Extradition Code Type 1-Felony Full ☐ C-Misdemeanor Surrounding States 5-Felony Pending Extradition Distance: ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 2-Felony Limited ☐ E-Misdemeanor Pending Extradition □ 3-Felony Surrounding States ☐ A-Misdemeanor Full 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number ☐ YES 🖾 NO IF-2018-0049 Co-Defendant(s) ров 03/01/1982 **GENDER** Add'l DOB Middle Name Last Name Gen. First Name Male Female **AKA** ☐ White ☐ Hispanic Unknown RACE Black Native American ETHNICITY ☐ Non-Hispanic Unknown PLE (Purple) BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) Hair GRN (Green) PNK (Pink) ONG (Orange) WHI (White) XXX (Unk./Bald) BLK (Black) Color BLN (Blonde / Strawberry) GRY (Gray) BLU (Blue) BRO (Brown) GRN (Green) BLK (Black) Eye PNK (Pink) Color ☐ HAZ (Hazel) MAR (Maroon) XXX (Unknown) WEIGHT (lbs.) DNA ☐ YES □ NO **DNA Location** FBI Number MNU Number **Defendant Fingerprinted** ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Registration Oth, NCIC Veh, Code Comm'l Veh. School Veh. Rea. State Haz Plate # JDS6317 mat Ind. same as PA Sticker (MM/YY) 6/18 Def. Model Color VIN Year Make Style П JTHBJ46G682213115 2008 Lexus Sdn 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). SDAG LINDA MONTAG (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) #564 SA JOSEPH JONAS (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) 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 8027 Moro St Philadelphia, Pa with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) (Place-Political Subdivision) on or about NOVEMBER 12, 2017 THRU JANUARY 19, 2018 in PHILADELPHIA County [51] (County Code)



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Defendant Name:	JERMOND		L		HARPER		
The acts committed by When there is more that (Set forth a brief summary or without more, is not sufficiently age of the victim at the tollisted. If the identity of an	an one offense, of the facts sufficient nt. In a summary cas ime of the offense n	each offense sho to advise the defend e, you must cite the lay be included if kn	ould be number lant of the nature of specific section(s own, in addition, s	ed chronolo of the offense(s) and subsecti ocial security	ogically. s) charged. A c on(s) of the sta numbers and f	itation to the statu atute(s) or ordinand inancial informatio	te(s) allegedly violated, ce(s) allegedly violated.
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Acts of the accused as presented to an insurer a stathing material to the claim, to Company to pay renters insurers.	itement forming a pa	art of, or in support de at least one mate	of, a claim which c erially false, incom	ontained false, olete or mislea	, incomplete or ding statement	misleading information in order to cause a	ation concerning a fact or Allstate Insurance
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		ection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data	Accident Number			☐ Interstate		Safety Zone	☐ Work Zone
(if applicable) Statute Description (in	clude the name	of statute or ordi	nance): crimin	IAL ATTEMPI	/ /THEFT BY D	ECEPTION	
Acts of the accused as an act which constituted a s statement in an attempt to c Defendant submitted fraudu	ubstantial step towa cause Alistate Insura lent receipts to supp	rd the commission once Company to payort his claim.	f said crime, to wit	: defendant m benefits in ex	ade at least on cess of \$44,230	e materially false, i	incomplete or misleading is not obligated to pay.
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□ #3 410) (2) of the bsection	18 PA Statute (Title) Counts	F-3 Grade	NCIC Offense Co	ode UCR/NIBRS Code
Lead? Offense#							
Lead? Offense# PennDOT Data (if applicable)	Accident Number			☐ Interstat	e L	☐ Safety Zone	☐ Work Zone

Docket	Number:		Date /	Filed:		OTN	1/LiveScar	1 Nu	ımbe	r				laint/Incide 18-0049	ent Numk	er
Defend	ant Name		First:				Middle:				La		-n			
Deterior	ant Name		JERM	OND							H <i>F</i>	ARP	EK			
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Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number IF-2018-0049		
Defendant Name:	First: JERMOND	Middle:	Last:	RPER		
	JERMOND	Middle: L mons be issued and that the defer	HAF	RPER		

- 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 $\underline{\hspace{1cm}}$.
- 5. 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 that 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.)

		ZA		
(Date)	(Year)	(\$)	gnature of Affiant)	
AND NOW, on this date	10/29	I certify that the complaint has been proper-	erly completed and	l verified.
An affidavit of probable cause mu	ist be completed before a wa	rrant can be issued.		
(Magisterial District Court Numbe	r) (Issuj	ing Authority)	SEAL	

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0049
Defendant Name:	First: JERMOND	Middle:	Last: HARPER

AFFIDAVIT of PROBABLE CAUSE

- A) Your Affiant is Joseph Jonas, Special Agent with the Pennsylvania Office of Attorney General (OAG); Bureau of Criminal Investigation (BCI), Insurance Fraud Section. Your Affiant has over (29) years of law enforcement/criminal investigative experience and being duly sworn according to law deposes and says:
- B) The OAG received an Insurance Fraud Referral from Allstate Insurance Company (Allstate) Special Investigator Michael Chesterman (Chesterman). Investigator Chesterman alleged that Jermond Harper (Harper) DOB 03/01/1982, currently residing at 700 Farmington Avenue in Pottstown, Pennsylvania, had opened a renter's policy with Allstate Insurance company when he rented his apartment at 8027 Moro Street, Philadelphia, Pa 19136. Harper submitted a claim with Allstate for a theft from his vehicle while it was parked in his driveway located at 8027 Moro Street in Philadelphia, PA on 11/12/2017. As part of the claim, Harper submitted altered receipts alleged to have been completed by the business "Studio 6", a men's clothing store located at 238 South Street in Philadelphia, PA. The facts below provide probable cause to believe that Jermond Harper committed Insurance Fraud; Criminal Attempt to Commit Theft by Deception, Forgery and Criminal Use of Communication Facility by providing false and misleading information and forged documents to Allstate through the use of his iPhone and Staples Business Center.
- C) In connection with this investigation your Affiant reviewed Allstate's claim file. Your Affiant interviewed Allstate Special Investigator, Michael Chesterman and reviewed the file with him. Based on the review of the file and an independent investigation, your Affiant learned the following:
 - 1) Jermond Harper purchased a Renters Policy from Allstate on 10/2/2017 Policy Number # 0998742959 with the effective date 10/2/2017 for the property located at 8027 Moro Street in Philadelphia County.
 - 2) On 11/13/2017 at 9:43 am. Harper filed a Philadelphia Police report stating that he parked his vehicle on 11/11/17 at approximately 5:30 pm in front of 8027 Moro Street in Philadelphia with items that he retrieved from his mother's house located at 700 Farmington Avenue Pottstown, PA, that he placed in the trunk of his vehicle. Harper states he went home to his house at 8027 Moro Street in Philadelphia and went to sleep and went to work early in the morning of 11/12/2017. The report states that after he returned home from work around 8:30 am, Harper noticed the items in the trunk were gone.
 - a. According to the Philadelphia police report, DC # 17-08-041848, Harper reported the following items stolen; 3 fur coats, a Gucci coat, Gucci shoes, Gucci sneakers, Chrome Glasses, multiple sneakers, and name brand sweaters.
 - 3) On 11/13/2017 Harper called Allstate Insurance Company to file a claim. He provided information regarding the incident to claims adjuster Ruben Rodriguez Valerio. On 11/14/2017 at 10:31 am Harper sent a complete loss list template via email from the Staples Business Center of the items he claimed were stolen from his vehicle. This list contained 18 items totaling over \$43,000 in lost value.

Page 1 of _



Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0049	
	First:	Middle:	Last:	
Defendant Name:	JERMOND	L	HARPER	

- 4) On 11/14/2017at 3:53 pm Harper sent pictures to Allstate Claims Department from his iPhone of the receipts, he claimed were the clothing receipts for the alleged stolen items.
 - a. The three "Studio 6" receipts submitted by Harper listed the following items: 1 Brown, tan and yellow Baseball Mink Jacket valued at \$7200 dated 1-3-2003; 1 Black Mink Jacket valued at \$6500 dated 9-8-2003; 1 Black Gucci leather jacket valued at \$6900 dated 10-12-2004.
- 5) Investigator Chesterman spoke to Dwayne Brown the owner of "Studio 6" and concluded Harper submitted fraudulent receipts from Studio 6 to support his claim.
- D) On 9/20/2018 your Affiant interviewed Dwayne Brown (Brown) who gave a recorded statement. Brown stated that he was the owner of "Studio 6", located at 238 South Street in Philadelphia, PA. Brown stated that he does not know Jermond Harper. Brown also stated that the receipts Harper submitted were not from his store and that he never sold items at the value that was on Harper's receipts. Brown stated that he believes that in 2003 and 2004 he was handwriting his receipts because it was shortly after he opened his store and they didn't have a machine that printed out receipts. He had small cash register receipts and he would hand write a larger copy if the buyer asked for an itemized receipt. Brown stated that he never had any salesperson named David or Adam who worked for him which was listed on Harper's receipts. Brown stated that he did not know Jermond Harper and did not give Harper permission to create receipts.
- E) Harper also submitted two additional receipts from an alleged store named "MDM61". Harper purported to have bought the following items at "MDM61": a black full length mink coat valued at \$7,875 this receipt was dated 2-10-2003 and a full length chinchilla coat valued at \$8,326, this receipt was dated 1-10-2004. The receipts Harper submitted from "MDM61" appeared similar in format, did not contain an address and the sales person's name listed on the receipt is "Mary." Your affiant was not able to confirm the existence of "MDM61", your affiant conducted a Pennsylvania corporation's database check and a store with the name "MDM61" was not found. Additionally Investigator Chesterman located an address listing of MDM61 at 640 South Street, this address was not contained on the receipt and this address is a vacant building. Your affiant also confirmed this building is a vacant building.
- F) Allstate did not payout Jermond Harper's the theft claim.
- G) Based on the foregoing Jermond Harper, has committed the following crimes:

18 PA C.S.A. 4117 (a) (2) Insurance Fraud [F-3]

18 PA C.S.A. 3922 (a) (1) Criminal Attempt/Theft by Deception [F-3]

18 PA C.S.A. 7512 (a) Criminal Use of Communication Facility [F-3]

18 PA C.S.A. 4101 (a) (2) Forgery [F-3]

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint IF-2018-	Uncident Number 2049
	First:	Middle:	Last:	
Defendant Name:	JERMOND	L	HARPER	

I, SA JOSEPH JONAS, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	isol -
	(Signature of Affiant)
Sworn to me and subscribed before me this $10/29$ day of	
Date	, Magisterial District Judge
My commission expires first Monday of January,	
	SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAIN I COUNTY OF: CHESTER COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 15-2-01 VS. MDJ: Hon. Joann Teyral (NAME and ADDRESS): Address: 347 Bridge Street **DEBONA** JR. JOSEPH Middle Name Last Name Phoenixville, PA 19460 First Name Gen 422 East Spring Street Ardmore, PA 19003 Telephone: (610)935-1503 NCIC Extradition Code Type ☐ 1-Felony Full □ C-Misdemeanor Surrounding States ☐ 5-Felony Pending Extradition . Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ F-MIsdemeanor Pending Extradition □ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Døcket Nymber Complaint/Incldent Number Date Filed QTN/LiveScap Number Request Lab Services? -18 - 480 10/251 YES NO IF-2018-0102 **GENDER** ров 04/14/1973 Co-Defendant(s) POB Add'I DOB ☐ Male First Name Last Name Middle Name Gen. ☐ Female AKA RACE White ■ White Aslan Black Native American Unknown ETHNICITY Hispanic ☐ Non-Hispanic Unknown RED (Red/Aubn.) GRY (Gray) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye ☐ HAZ (Hazel) Color MAR (Maroon) PNK (Pink) XXX (Unknown) ☐ MUL (Multicolored) DNA ☐ YES **⊠** NO **DNA Location** WEIGHT (lbs.) FBI Number **MNU Number** 225 Defendant Fingerprinted ☐ YES NO NO Ft. HEIGHT In. Fingerprint Classification: 5 11 **DEFENDANT VEHICLE INFORMATION** Oth. NCIC Veh. Code State Registration Haz Comm'l Veh. School Veh. Reg. Plate # JTC2811 mat Ind. same as PA Sticker (MM/YY) Def. VIN Year Make Model Style Color WVGBG77L85D004385 2008 Bmw 3281 4d Black Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest war/ant affidavit for both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG ROBERT G. LABAR 10/12/18 (Name of the attorney for the Commonwealth) ney for the Commonwealth) SPECIAL AGENT JOHN A. TREVISAN JR. **BADGE #546** (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) 5 Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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 have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [202] 71 General Warren Blvd, Malvern, Subdivision Code) (Place-Political Subdivision) Pa 19355

on or about FEBRUARY 23,2018 TO PRESENT

in CHESTER County

[15]

(County Code)

			*				必要なて			COMPLAIN
Docket Nu	mber:	Date ID /	Filed:	04/65	N/LiveScan I	Numb	er		olaint/Incident N 018-0102	lumber
Defendant	Namer	First:			Middle:			Last:		
Maring in the		JOSEI	PH					DEBONA	JR.	
When the (Set forth a without mor	re is mo brief sumn e, is not si he victim a	re than one on any of the facts ufficient. In a su	offense, each sufficient to adv	offense shi lse the defen must cite the Included if ki	ould be num dant of the natu specific section	beredure of to on(s) a on, soo	d chronolo the offense(s nd subsection tal security r	gically.) charged. A con(s) of the st	citation to the statu atute(s) or ordinan Inancial informatio	ated, if appropriate. ute(s) allegedly violated, uce(s) allegedly violated. on (e.g. PINs) should not
Inchoate Offense	☐ Atte 18 9	empt 101 A	☐ Solicitation 18 902 A		onspiracy 3 903			Number of	Victims Age 60 o	r Older
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Jan at 1900 Sept Whench To have beliefully	OT Data licable)	Accident N	lumber	-			Interstate		Safety Zone	☐ Work Zone
		n (include the	e name of stat	ute or ordi	nance): INS	JRAN	CE FRAUD			-
which contain Progressive : Somerset, No Jr. reported	ned false, Insurance ew Jersey, the vehicle	incomplete, or r Company his 20, Debona stated stolen to Proge ent as to when i	nisleading Inform 08 BMW 328i wa that he drove thi	ation concerrs was stolen s vehicle ther -18. Progres the the the	ning a fact or th between 02-23 e on 02-23-18, sive obtained in	ing ma -18 int went	aterlal to the o 03-02-18 v to retreive hi	claim; to wit: while parked, is vehicle on C icle was repos	Joseph Debona Jr in the Double Tree 3-02-18 and found	Hotel parking lot in d it was missing. Debona 8 and not stolen. Debona
Offense		01 A	18 902 A		903			Trainisor or		
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Lead? Offe	ense#	Section	Subsection		PA Statute (T	ille)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennD((if appl	OT Data icable)	Accident N		- .			Interstate	🗆	Safety Zone	☐ Work Zone
			name of stat	ute or ordi	nance): CRIM	1INAL	. ATTEMPT/	THEFT BY I	DECEPTION	*
C.S.A§3922 (Progressive I Somerset, No Jr. reported	Acts of the accused associated with this Offense: Joseph Debona Jr. did, with the Intent to commit the crime of Theft by Deception, Title 18 Pa. C.S.A§3922 (a) (1), commit an act, which constituted a substantial step toward the commission of said crime; to wit: Joseph Debona Jr. reported a claim to the Progressive Insurance Company, his 2008 BMW 328I was was stolen between 02-23-18 into 03-02-18 while parked, in the Double Tree Hotel parking lot in Somerset, New Jersey. Debona stated that he drove this vehicle there on the 02-23-18, went to retreive his vehicle on 03-02-18 and found it missing. Debona Jr. reported the vehicle stolen to Progressive on 03-03-18. Progressive obtained information this vehicle was repossessed on 02-08-18 and not stolen. Debona Jr. made a fale statement in an attempt for financial gain for the value of the vehicle in excess of \$2,000 for which he was not entitled.									
Inchoate Offense		ttempt 3 901 A	Solicitation		onspiracy 1903		Numbe	r of Victims	Age 60 or Older	E.
	3	7512	· (a)	of the	TITLE 18		1	F3		
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(a), to wit: De	ebona Jr. ı oona Jr. di	used a cellphone d use a cellphon	or telephone on	03-03-18 In	order to facilital	te the	commission (of the crime of	f Insurance Fraud,	nder 18 Pa C.S.A. §7512 , a felony of the third s to Progressive in

10PC 412A - Rev. 7/18

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Docket Number:	Date Filed:	U6416	TN/LiveScan N	lumber			olaint/Incident Nur 018-0102	mber
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	ection Subs	ection	PA Statute (Tit	ile) (Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number ——			☐ Int	erstate		Safety Zone	☐ Work Zone
Statute Description (inc		statute or or	dinance): FALS	E REPOR	TS TO LAV	VENFORC	EMENT AUTHORIT	ES
		3						
Acts of the accused ass	ociated with this	Offense: Jose	ph Debona Jr mac	de a false i	report to lav	w enforcen	nent authorities to con	nmit the offense of
False Report to Law Enforcem	ent Authorities. Title	18 PA C.S.A.§ 4	906: to wit: On 03	3-04-18. Jo	seph Debo	na Jr. filed	a false stolen vehicle	theft report with
Ofc. Richard Hartnett of the F	ranklin Township, (N	J), Police Depart	ment in which he	claimed hi	s 2008 BM	N 328i hac	been stolen. Debona	, Jr. told police that
he was current with his paym	ents to the finance c	ompany and It w	as not towed by the	he hotel w	ere he park	ced his veh	icle last. Debona's ve	ehicle was towed by
the finance company approxir	nately 20 days befor	e he made the st	tolen vehicle repor	t. The veh	icle was in	the reposs	ession lot from 02-08-	·18 through 03-31-
18 but Debona told police, he	drove that vehicle to	the hotel parkir	ng lot on 02-23-18					
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Inchoate temp		A CONTRACTOR OF THE PROPERTY O	Conspiracy 18 903		Number o	of Victims	Age 60 or Older	
Continue in the contract of th	1 7000						·	
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Acts of the accused ass	ociated with this	Offense:						in .
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冷酸 POLICE UKIMINAL CUMPLAIN I

Docket Number: CR-280-18	Date Filed: 10 / 25/ 18	UG4165	TN/LiveScan Number 54 - 6	Complaint/Incident Number IF-2018-0102
Defendant Name:	First:		Middle:	Last: DEBONA JR.
Chip of the Angular Court of C. A. C.	JUSEPH			DEDONA JV.

- 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 $\underline{7}$.
- 5. 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 that 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.)

OCTOBER 22, 2018

(Date)

(Year)

AND NOW, on this date 25 20% 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.

15-4-03

(Magisterial District Court Number)

(Issuing Authority)

「強約」 PULICE UKIIVIINAL UUIVIPLAIN I

Docket Number: CR-280-18	Date Filed:	U6416	TN/LiveScan Number 54-6		Complaint/Incident Number IF-2018-0102	
	First:		Middle:	La	nst:	
Defendant Name;	JOSEPH	,		D	EBONA JR.	

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant is John A. Trevisan Jr., a Special Agent employed by Pennsylvania Office of Attorney General (OAG); Bureau of Criminal Investigations (BCI), Insurance Fraud Section. Your Affiant has over twenty years of law enforcement / criminal investigation experience and being duly sworn according to law deposes and says:
- B. This case was referred to the Pennsylvania Office of Attorney General by Robin Seagreaves, Special Investigator for the Progressive Insurance Company, (Progressive), located at 71 General Warren Boulevard, Suite 150 Malvern, PA. This case involved a male subject identified as Joseph Debona, Jr. Debona, Jr.'s 2008 BMW 328i bearing vehicle identification number WBAVC53508FZ87917 and Pennsylvania registration JTC2811, was insured by Progressive under policy number 916456983001. On 03-03-18, Debona, Jr. reported to Progressive, that his 2008 BMW 328i was stolen from Double Tree Hotel in Somerset, New Jersey. Debona, Jr. stated that he left the vehicle in the parking lot of that hotel on 02-23-18 and returned on 03-02-18 at 11:00pm and found the vehicle gone. Debona, Jr. stated he informed the hotel and the Franklin Township Police Department of this theft of his vehicle. Progressive investigated that claim and found that the vehicle was repossessed on 02-08-18 and was in the parking lot of repossession lot since that date. Seagreaves believes Debona, Jr. committed Insurance fraud because of his false claim that his vehicle was stolen.
- C. In connection with this investigation, your Affiant reviewed the Progressive Insurance Company claim file notes and other documentations related to Joseph Debona, Jr.'s claim. Your Affiant has interviewed Robin Seagreaves and reviewed the claim file with her. Based on that review of the file and interview of Seagreaves, your Affiant learned the following:
 - 1. On 03-03-18, Joseph Debona, Jr. via telephone, filed a claim, (#0120182512089) with Progressive Claims Department. Debona, Jr. told Progressive his 2008 BMW 328i was stolen from the Double Tree Hotel Parking lot located at 200 Atrium Drive Somerset, New Jersey 08873, sometime between 02-23-18 and 03-02-18. Debona, Jr. parked the vehicle in the parking lot of the hotel on 02-23-18. Debona, Jr. stated he left for New York, returned on 03-02-18 and found his vehicle missing from where he parked it. Debona, Jr. stated that he checked the hotel to see if the vehicle was towed for some reason but it was not towed by the hotel. Debona, Jr. stated that he was current with his payments for the vehicle and it was not repossessed.
 - 2. On 03-06-18, Progressive Claims adjuster James Dunda contacted Joseph Debona, Jr. via telephone. Dunda's office is located at 71 General Warren Boulevard, Malvern, PA 19355. Debona, Jr. represented his vehicle was still missing. Debona, Jr. represented he parked his vehicle at the Double Tree Hotel on 02-23-18 and took a bus to New York City. Debona, Jr. stated that he returned from his trip on 03-02-18 to find the vehicle missing. Debona stated he reported the vehicle stolen to the Franklin Township Police Department on 03-03-18.
 - 3. On 03-06-18, Dunda obtained a vehicle location report via Trans Union TLO XP website which provided data from automated license plate readers. Automated License Plate Readers, (ALPR) are normally attached to a fixed object, law enforcement vehicles and repossession vehicles to capture the license plate number of a certain vehicle. These ALPRS retain the data of location, time and date of that specific reading. ALPR records showed approximately 29 instances where an ALPR was reading the license plate number JTC2811 on Debona's vehicle.

These instances all occurred in a vehicle repossession lot located near the Monmouth Airport located in Wall Township, New Jersey. These readings took place between 02-13-18 and 02-28-18.



Docket Number: (K-280-18	Date Filed: 10 125 1 1 8	OTN/LiveScan Number			Complaint/Incident Number IF-2018-0102	-1
	First:		Middle:	Last:		
Defendant Name:	JOSEPH			DEB	ONA JR.	

- 4. On 03-07-18, Seagreaves (SIU /Progressive) called the Wall Township, (NJ), Police Department that this vehicle was still parked in the repossession lot. Seagreaves received the confirmation the vehicle was still there. Seagreaves called Repossession Specialists, Inc., (repossession towing service) and found that Debona, Jr.'s vehicle was repossessed on 02-08-18. This vehicle had been located in their repossession lot since that date.
- 5. Progressive assessed a reserve on the claim by Debona, Jr. in the amount of \$10,000.
- D. On 09-05-18, your Affiant contacted John Schumann, (Director of Operations) of the Dcuble Tree Hotel and asked him to verify if Debona, Jr. inquired with any employees about his vehicle that was missing on or around 03-02-18. Schumann stated none of his employees spoke with Debona, Jr. in or around that date about his missing vehicle. Schumann stated that Debona Jr. was registered at the hotel at that time but no one remembers having contact with Debona, Jr.
- E. On 09-05-18, your Affiant spoke with Scott Welchons, owner of Del Mar Recovery Solutions who sub-contracted with Repossession Specialists, Inc., for the actual vehicle recovery for Debona, Jr's vehicle. Del Mar Recovery Solutions is the company that provided repossession services for State National Companies which provided Debona, Jr.'s the loan for buying his 2008 BMW 328i. Welchons stated they did received notice from Repossession Specialists that Debona, Jr.'s vehicle was recovered on 02-08-18.
- F. On 09-17-18, your Affiant spoke with Officer Richard Hartnett of the Franklin Township Police Department regarding this case. Officer Hartnett was the officer that took the stolen vehicle report from Joseph Debona, Jr. on 03-04-2018. Officer Hartnett gave your Affiant a synopsis of his stolen vehicle report:

On 03-04-18, Debona, Jr. reported he parked his vehicle, a 2008 BMW 328i bearing Pennsylvania registration JTC2811 in the Double Tree hotel parking lot in Somerset, New Jersey on 02-23-18 at approximately 12:00 PM. Debona, Jr. locked for his vehicle and had the key for that vehicle. At approximately 11:00 PM on 03-02-18, Debona, Jr. went outside after returning from New York City to find his vehicle missing. Debona, Jr. contacted hotel employees to verify his vehicle had not been towed by them. Debona, Jr. contacted the Franklin Township Police Department Police to report the vehicle stolen. Debona, Jr. stated he was current with his payments and he is the only one that uses the vehicle. On 03-07-18, the Wall Township, (NJ), Police Department called the Franklin Township Police Department to inform they had located Debona Jr.'s vehicle in the lot of Repossession Specialists in their jurisdiction and the vehicle had been repossessed.

G. Based on the above affidavit, your Affiant concludes that probable cause exists to conclude that Joseph Debona Jr. committed the following crimes:

18 Pa C.S.A. §4117 (a) (2) 18 Pa C.S.A. §901 / §4117 (a) (2)

18 Pa C.S.A. §7512 (a) 18 Pa C.S.A. §4906 (b)(1) Insurance Fraud (F3)

Criminal attempt / Theft by Deception (F3)
Criminal Use of Communication Facility (F3)

False reports to law enforcement authorities (M3)

Docket Number: CR-280-18	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0102	
Defendant Name:	First: JOSEPH	Middle:	Last: DEBONA JR.	

I, SPECIAL AGENT JOHN A. TREVISAN JR., 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

(Signature of Afflant) Sworn to me and subscribed before me this 25 day of 22 Asil

, Magisterial District Judge

My commission expires first Monday of January, 2024_

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: MONTGOMERY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 38-1-23 VS. (NAME and ADDRESS): MDJ: Hon. Deborah Lukens Address: 4002 Center Avenue KENNESHA LATAY WATSON First Name Middle Name Last Name Gen Lafavette Hill, PA 19444 541 N. Allison Street Philadelphia, PA 19131 Telephone: (610)828-5226 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: □ 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition ☑ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Docket Number OTN/LiveSgan Number Complaint/Incident Number Request Lab Services? Data Filed ☐ YES ☐ NO CR-I 064165 ٥ 25 IF 2017 0323 Ров Pennsylvania Co-Defendant(s) **GENDER** ров 05/18/1991 Add'I DOB ☐ Male First Name Middle Name Last Name Gen. AKA White Black RACE Native American Unknown Asian Hispanic ETHNICITY Non-Hispanic Unknown SDY (Sandy) PLE (Purple) BRO (Brown) GRY (Gray) RED (Red/Aubn.) BLU (Blue) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) GRN (Green) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) Eve MAR (Maroon) PNK (Pink) Color ☐ HAZ (Hazel) XXX (Unknown) **DNA Location** WEIGHT (lbs.) DNA ☐ YES ☐ NO FBI Number 403808HD4 **MNU Number** Ft. HEIGHT In. ☐ YES Defendant Fingerprinted 5 2 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Registration Oth, NCIC Veh. Code State Haz Comm'l Veh. School Veh. Reg. mat Ind. same as Plate # KLC-8704 PA Sticker (MM/YY) 05/18 \Box Def. VIN Year Make Model Style Color \boxtimes 2015 200 Sdn White Chrysler 1C3CCCAB3FN679400 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). SDAG KENNETH MCDANIELS (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SPECIAL AGENT RICHARD WEISBROD 723848 PA OAG (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) 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 [107] 5165 Campus Drive Suite 100 (Place-Political Subdivision) (Subdivision Code) Plymouth Meeting, Pa 19462 in MONTGOMERY County on or about SEPTEMBER 25, 2017 THROUGH OCTOBER 2, 2017 [46] (County Code)



							P P	OLI	CE (CRIMINAL (COMPLAINT
Docket Num	ıber:	Date I	Filed:	0.	TN/LiveScan	Numbe	er	1.0		laint/Incident Nu	mber
		First:	/		Middle:			Last:	IF-20	17-0323	
Defendant I	Name:	KENNE	SHA		LATAY			WAT	SON		
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 <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) 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. 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.)											
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	thing material to the claim, to wit: defendant, made at least one materially false, incomplete or misleading statement in order to cause Progressive Insurance Company to pay insurance benefits, which Progressive was not obligated to pay, in connection with damage to an auto that occurred on September 20, 2017. Inchoate Attempt Solicitation Conspiracy Number of Victims Age 60 or Older Number of Victims Age 60 or Older										
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Acts of the commit an act misleading sta	Statute Description (include the name of statute or ordinance): CRIMINAL ATTEMPT/ THEFT BY DECEPTION Acts of the accused associated with this Offense: The defendant did, with intent to commit the crime of Theft by Deception, 18 Pa. C.S.A. 3922(a), commit an act which constituted a substantial step toward the commission of said crime, to wit: defendant made at least one materially false, incomplete or misleading statement in order to cause Progressive Insurance Company to pay insurance benefits in excess of \$2,000.00, which Progressive was not obligated to pay, in connection with damage to an auto that occurred on September 20,2017.										
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	fense#	Section	Subsec	ction	PA Statute	(Title)	Counts	1	Grade	NCIC Offense Cod	e UCR/NIBRS Code
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AOPC 412A - Rev. 7/18

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
	111		IF-2017-0323
D. C. J. LAI	First:	Middle:	Last:
Defendant Name:	KENNESHA	LATAY	WATSON

- 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. 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 that 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

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

(Date)

(Year)

(Signature of Affiant)

AND NOW, on this date

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.

(Magisterial District Court Number)

(Issuing Authority)

SEAL



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2017-0323
D-f d t-N	First:	Middle:	Last:
Defendant Name:	KENNESHA	LATAY	WATSON

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant is Richard Weisbrod, a Special Agent with the Pennsylvania Office of Attorney General, Bureau of Criminal Investigations, Insurance Fraud Section. Your Affiant has over 21 years of law enforcement/criminal investigative experience and being duly sworn according to law deposes and says:
- B. The Office of the Attorney General received an insurance fraud referral from Progressive Insurance Company (Progressive), Special Investigator Jason Truitte. Truitte alleges that Kennesha Watson made misrepresentations by stating that the collision, in which she was involved, had occurred after she obtained a policy with Progressive when, in fact, the collision happened prior to Watson obtaining the policy. The facts below provide probable cause to believe that Watson committed Insurance Fraud, Criminal Attempt Theft by Deception, and Criminal Use of Communication Facility by providing false and misleading information via a telephone call to Progressive Insurance in order to have Progressive pay for damage and medical bills for which Progressive was not responsible.
- C. In reviewing the claim notes, audio recorded interviews, supporting documents, and speaking with Jason Truitte your Affiant learned the following:
- 1) According to Progressive Insurance, Kennesha Watson obtained a twelve-month automobile insurance policy with Progressive Insurance, policy number 915410658, with an effective policy period of 06/15/2017-12/15/2017. A 2015 Chrysler 200 bearing VIN 1C3CCCAB3FN679400 was covered by the policy. The policy was cancelled by Progressive on 08/11/2017 for non-payment.
- 2) According to Pennsylvania crash report number P2053592, completed by Philadelphia Police Officer McAllister # 7027, on 09/20/2017, at 10:40 PM, Kennesha Watson collided with a parked tour bus while operating her 2015 Chrysler 200 bearing VIN 1C3CCCAB3FN679400 in the 4000 block of Westminster Avenue in Philadelphia, PA. The report indicates that Watson was insured by Progressive Insurance, policy # 915410658. The report stated Watson and her two children were transported from the scene to Childrens Hospital of Philadelphia via Philadelphia Fire Medic Unit # 41.
- 3) According to Progressive Insurance, on 09/21/2017, at 7:05 AM, Kennesha Watson called Progressive Insurance. Watson provided her DOB of 05/18/1991, and the phone number 267-469-4120 as proof of identification. Watson stated she wanted to know what needed to be paid to activate her policy. Watson was advised that there was a balance due she would have to pay and that they could transfer her to a licensed agent to obtain a new policy. The call was recorded up to the point she was transferred. According to the claim notes, policy number 917087143 covering the same 2015 Chrysler 200 was incepted on 09/21/2017 at 7:27 AM.
- 4) According to Progressive Insurance, on 09/25/2017, at 5:23 PM, Kennesha Watson called Progressive Insurance to report a claim. Watson provided her name, address, DOB of 05/18/1991, and phone number 267-469-4120 as proof of identification. Watson stated she was operating her car at Westminster Avenue and 40th Street in Philadelphia when she struck a parked tour bus. Watson stated the collision happened on 09/24/2017, at around 11:00 PM. Watson stated she provided the old policy number since she did not have the new one because it was on her phone. Watson stated her children were in the car and claimed minor injuries to herself and her children.



Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2017-0323
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5) According to Progressive Insurance, on 09/29/2017, at 11:15 AM, Inez Johnson, of Progressive Insurance, conducted a recorded telephone interview with Kennesha Watson. Johnson was located at the office of Progressive Insurance, 5165 Campus Drive Plymouth Meeting, PA at the time of the call. Watson provided her name, DOB of 05/18/1991, address, and telephone number as proof of identification. During the interview, Watson told Johnson that the collision occurred on 09/24/2017, around 11:00 PM in the 4000 block of Westminster Avenue. Johnson told Watson that the police report and the bus company said the collision occurred on 09/20/2017. Watson's only response was that the police made a mistake on the report. Johnson then called CHOP while on the phone with Watson and was advised that her children were admitted on 09/20/2017 and discharged on 09/21/2017. Once the call with CHOP was completed, Watson hung up.

6) The reserves set by Progressive for damage and injuries are listed below:

Collision: 2015 Chrysler 200 - \$3,334.00

Property Damage: 1997 MCI Bus - \$2,649.00

PIP: Kennesha Watson - \$1,666.00

PIP: Jayde Pressley - \$1,597.00

PIP: Zakah Watson-Johnson - \$1,597.00

7) On 10/02/2017 the claim was denied by Progressive for fraud or misrepresentation.

D. On 10/04/2018, your Affiant interviewed Romuald Turrene, who was the owner of the tour bus that was struck by Watson. Turrene verified that he took photographs of the bus on 09/21/2017 when he discovered the damage and stated it sat there for several weeks with the damage. Turrene provided an invoice for the repair of the damage to the bus totaling \$6,259.95.

E. On 10/05/2018, your Affiant interviewed Kennesha Watson. During the interview, Watson admitted that the date of the collision was 09/20/2017, that she obtained an automotive insurance policy for her Chrysler on 09/21/2017, and that she lied about the date of the collision when she made her claim with Progressive on 09/25/2017. Also, Watson admitted that she lied when interviewed by Progressive on 09/29/2017.

F. Based on the foregoing, Kennesha Watson has committed the following crimes:

Title 18 Pa. C.S.A. §4117 (a)(2) Insurance Fraud (F3)

Title 18 Pa. C.S.A. 901/3922 (a) Criminal Attempt Theft by Deception (F3)

Title 18 Pa. C.S.A. 7512 (a) Criminal Use of Communication Facility (F3)

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
D. C J. (M.	First:	Middle:	Last:
Defendant Name:	KENNESHA	LATAY	WATSON

I, SPECIAL AGENT RICHARD WEISBROD, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	(Signature of Affian	(1)
Sworn to me and subscribed before me this	Oct	10/8
Date Astord Tuken	, Magisterial District	udge
My commission expires first Monday of January, 2024		
	SEAL	

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: CHESTER COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 15-2-01 MDJ: Hon. JOANN L. TEYRAL (NAME and ADDRESS): Address: 347 BRIDGE STREET LURJIE ST.VICTOR First Name Middle Name Last Name PHOENIXVILLE, PA, 19460 Gen 1514 NE. 3RD AVENUE FORT LAUDERDALE, FL 33304-1030 Telephone: (610)935-1503 NCIC Extradition Code Type ☐ 1-Felony Full ☐ 5-Felony Pending Extradition □ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number Request Lab Services? 101951 18 U641766-6 ☐ YES 🖾 NO IF-2018-0054 **GENDER** ров 12/16/1992 Co-Defendant(s) POB Add'l DOB First Name Middle Name Last Name Gen. AKA RACE White Native American Unknown **ETHNICITY** Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRY (Grav) GRN (Green) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) FBI Number **MNU Number** Defendant Fingerprinted ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 5 DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Reg. Plate # JXF2416 mat Ind. same as PΑ Sticker (MM/YY) 06/18 Def. VIN Year Make Model Style Color П JH4CU2F66AC038727 2010 | Acura Sdn Tsx 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 by approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG ROBERT LABAR (Name of the attorney for the Commonwealth) the atterney for the Commonwealth) SA JOSEPH JONAS #564 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) $\vec{\Diamond}$ 1. \times 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

150 Malvern, Pa 19355

in CHESTER County

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [407]

(County Code)

[15]

71 General Warren Boulevard Suite

(Subdivision Code) (Place-Political Subdivision)

on or about DECEMBER 22, 2017 THRU JANUARY 11, 2018



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(if app	licable)	Number				<u> </u>		terstate			☐ Safety Zone		☐ Work Zone
Statute Des	scription (inc	dude the nam	e of statu	te or ord	inance): CR	RIMIN	IAL USE	OF C	OMMU	NICAT	ION FACILITY		
cause, or facil	itate the commete or or otherwise	sociated with dission or the atte te misleading sta nmission or the a	empt thereof tement in co	f of a crime onnection w	e which consti vith an auto c	itutes a daim w	a felony ith Prog	, to wit ressive	: Lurjie : Insura	St.Victo	or used a cellpho	one to	Iphone, to commit, make at least one o, committed,

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Docket Number:	Date Filed:	OTN/LiveScan Nu	ımber Complaint/Incident Number
CR-281-18	10 03/18	U6417666	IF-2018-0054
	First:	Middle:	Last:
Defendant Name:	LURJIE		ST.VICTOR

- 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. 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 that 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.)

(Date)

(Year)

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.

(Magisterial District Court Number)

(Issuing Authority)

SEAL

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CK-281-18	10 125118	U 64171666	IF-2018-0054
	First:	Middle:	Last:
Defendant Name:	LURJIE		ST.VICTOR

AFFIDAVIT of PROBABLE CAUSE

- A) Your Affiant is Joseph Jonas Special Agent with the Pennsylvania Office of Attorney General (OAG); Bureau of Criminal Investigation (BCI), Insurance Fraud Section. Your Affiant has over (29) years of law enforcement/criminal investigative experience and being duly sworn according to law deposes and says:
- B) The OAG received an Insurance Fraud Referral from Progressive Insurance Company (Progressive) Special Investigator Angela Gaster (Gaster). Gaster alleged that Lurjie St. Victor (St. Victor) DOB 12/16/1992, currently residing at 1514 NE 3rd Avenue, Fort Lauderdale, FL, 33304, submitted a claim with Progressive for auto theft from 1300 Johnson Street in Philadelphia, PA, on December 22, 2017, at 5 pm. Gaster states that the incident happened on December 22, 2017 at 3:35 am. St. Victor purchased insurance after the fact at 3:19 pm on December 22, 2017 and lied about the time the theft occurred. The facts below provide probable cause to believe that Lurjie St. Victor committed Insurance Fraud; Criminal Attempt to Commit Theft by Deception and Criminal Use of Communication Facility by providing false and misleading information to Progressive through the use of her iPhone.
- C) In connection with this investigation your Affiant reviewed the Progressive claim file. Your Affiant interviewed Progressive Special Investigator, Angela Gaster (Gaster) and reviewed the file with her. Based on an independent investigation, your Affiant learned the following:
 - 1) On 12/22/2017 Lurjie St. Victor purchased an Auto Policy from Progressive policy # 912147419002, by phone for her 2010 Acura TSX Pennsylvania tag JXF2416 Vin# JH4CU2F66AC038727 with an effective date 12-22-2017 3:19 pm.
 - 2) On 12/26/2017 St. Victor called Progressive Insurance Company to file a claim. She provided information regarding the incident to claims adjuster Scott Walters (Walters) who is located at 71 General Warren Boulevard Suite 150 Malvern, PA, 19355. St Victor claimed she was out of town and called Wyche to ask him to move the car from 1101 Phil Ellena Street to Wyche's address at 1300 Johnson Street early in the morning of 12-22-2017. Walters claims that St. Victor lied about the facts of the theft in order to have Progressive pay the claim.
 - 3) Gaster retrieved video footage from security a camera outside the apartments at 1300 Johnson Street which shows two males stealing the Acura at 3:35 am, 12-22-2017. This video shows two men approaching St. Victor's Acura taking items and leaving, then approaching and using a remote to open doors and getting in and driving away with the vehicle at 3:41am, on 12-22-2017
 - 4) The stolen auto report from the Philadelphia Police Department shows that the officer responded to the call at 2:53 pm, on 12-22-2017. The report shows that the theft occurred on 12-22-2017, at 3:35 am and not at 5:00 pm as stated by St. Victor in her claim statement.



Docket Number:	Date Filed:	0	TN/LiveScan Number		Complaint/Incident Number
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Defendant Name:	LURJIE			ST.V	ICTOR

- D) On 10-1-2018 at 1:38 pm, your Affiant interviewed Audrey Churchill (Churchill) at her place of residence 1101 Phil Ellena Street in Philadelphia, PA. Churchill gave permission to have a recorded statement taken. Churchill stated she wasn't sure where St. Victor parked her car from October 2017 to December 2017. She believes it was parked at Chazzari's house at 1300 Johnson Street in Philadelphia, PA. Churchill stated that St. Victor's car was not parked at her house for the months of October thru December 2017. Churchill stated that the only time her car was parked at or near her house was when she would come over to visit.
- E) On 10-1-2018, at 1:52 pm, your Affiant interviewed Chazzari Wyche (Wyche) at his place of residence 1300 Johnson Street apartment C104 Philadelphia, PA. Wyche gave permission to have a recorded statement taken. Wyche stated that St. Victor's car was parked on the 1300 Block of Johnson Street for a couple of days prior to it being stolen on 12-22-2017. Wyche stated that he was not using the car for a few of days because he was pulled over by police a week or so before and his license was suspended. Wyche stated that when he noticed the vehicle was missing he called St. Victor around 2:45 pm before he called the Police to see if she had the vehicle. Wyche stated that St. Victor told him to call the Police to report it stolen.
- F) On 10-4-2018, at 11:56 am, your Affiant interviewed Lurjie St. Victor by phone from your affiant's office located at 1000 Madison Avenue Suite 310 in Norristown, PA. St. Victor gave permission to take a recorded statement by telephone. St. Victor stated that she removed her car from her policy on 10-11-2017 because she could not afford the insurance. St. Victor stated that she added it back on the policy on 12-22-2017 so her son's father Chazzari Wyche could use it. Policy was effective as of 12-22-2017 at 3:19 pm. St. Victor stated she left the car parked on the 1300 block of Johnson Street for a couple of weeks. St. Victor stated that Wyche called her about the car missing and she told him to call the Police and report it stolen. St. Victor stated that she made the claim right after Wyche reported the vehicle stolen to Police.
- G) Based on the foregoing Lurjie St. Victor, has committed the following crimes:

18 PA C.S.A. 4117 (a) (2) Insurance Fraud [F-3]

18 PA C.S.A. 3922 (a) (1) Criminal Attempt/Theft by Deception [F-3]

18 PA C.S.A. 7512 (a) Criminal Use of Communication Facility [F-3]



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Docket Number: Date Filed:		OTN/LiveScan Number	r	Complaint/Incident Number	
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Defendant Name:	LURJIE		S ⁻	T.VICTOR	

I, SA JOSEPH JONAS, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	and I
Sworn to me and subscribed before me this 25 day of	(Signature of Affiant)
Date	, Magisterial District Judge
My commission expires first Monday of January,	CEAL
Def C	SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: MONTGOMERY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 38-1-23 VS. MDJ: Hon. DEBORAH A. LUKENS (NAME and ADDRESS): Address: 4002 CENTER AVE. MELLONY MCCULLOUGH First Name Middle Name Last Name Gen LAFAYETTE, PA 19444 6020 W. Columbia Ave, Philadelphia, PA 19151 Telephone: (610)828-5226 **NCIC Extradition Code Type** ☐ 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number OTN/LiveScan Number Complaint/Incident Number Request Lab Services? Date Filed ☐ YES ☐ NO CR-I2 U623763-0 IF-2016-0248 **GENDER** ров 04/04/1976 ров Pennsylvania Co-Defendant(s) Add'l DOB ☐ Male First Name Middle Name Last Name Gen. AKA RACE ☐ White ☐ Native American Asian ⊠ Black Unknown ETHNICITY Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) PLE (Purple) SDY (Sandy) BLU (Blue) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color ☐ BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) ☐ MUL (Multicolored) XXX (Unknown) **DNA Location** DNA ☐ YES ☒ NO WEIGHT (lbs.) **FBI Number MNU Number** Defendant Fingerprinted ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 6 DEFENDANT VEHICLE INFORMATION State Haz Comm'l Veh. School Veh. Oth. NCIC Veh. Code Registration Reg. Ind. Plate # JGK-5985 PA mat same as Sticker (MM/YY) Def. VIN Year Make Model Style Color X 1C3CDFBA7DD247500 2013 | Dodge Dart Office of the attorney for the Commonwealth Approved D-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). SDAG KENNETH MCDANIELS (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) SPECIAL AGENT ANTHONY AMMATURO OAG BADGE #429 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) 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 [107] [107] 5165 Campus Dr., Plymouth (Subdivision Code) (Place-Political Subdivision) Meeting, PA 19461

on or about JUNE 20, 2016

in MONTGOMERY County

[46]

(County Code)



,				4635	PO			. COMPLAINT
Docket Number:	Date Filed:	0	TN/LiveScan Nu	ımber			olaint/Incident i 016-0248	Number
Defendant Name:	First: MELLONY		Middle:		La M	st: CCULLO	JGH	
The acts committed by When there is more that (Set forth a <i>brief</i> summary o without more, is not sufficient the age of the victim at the belisted. If the identity of an	an one offense, ea f the facts sufficient to nt. in a summary case lime of the offense ma	ach offense sl advise the defe , you must cite ti v be included if i	nould be numb ndant of the nature he specific section known. In addition.	ered chro of the offer (s) and subs social secu	nologi nse(s) c section(irity nui	Cally. charged. A c (s) of the st mbers and t	citation to the stat atute(s) or ordinar financial informati	ute(s) allegedly violated, nce(s) allegedly violated.
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□ 1 4117	(A) (2) of the	TITLE 18	1	F	3		
	ection Subsec		PA Statute (Title	e) Cour	nts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data	Accident Number			☐ Intersta	ate	П	Safety Zone	☐ Work Zone
(if applicable) Statute Description (inc	clude the name of	statute or ord	dinance): INSU F	RANCE FRA	UD			
presented to an insurer a stathing material to a claim, to Company to pay insurance but Inchoate	wit: The defendant, n	ade at least one sive was not obl	materially false, in	.complete or	mislea	iding statem age to an a	ent in order to ca	use Progressive Insurance on June 20, 2016.
Offense 18 901 A	18 902	_	18 903			Trainiber of	1	
□ 2 7512		of the	TITLE 18	1	<u> </u>	F-3 Grade	NCIC Offense	UCR/NIBRS Code
Lead? Offense# S	ection Subsection Subsection	Stion	PA Statute (Titl	e) Cou			Code Safety Zone	☐ Work Zone
(if applicable) Statute Description (in		statute or or	 dinance): CRIM					
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Inchoate 🛭 Attem Offense 18 901			Conspiracy 18 903	N	lumber	of Victims	Age 60 or Older	<u>0</u>
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Lead? Offense#	Section Sub	section	PA Statute (T	itle) C	ounts	Grade	NCIC Offense	Code UCR/NIBRS Code
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Acts of the accused as commit an act which constit misleading statement in or pay, in connection with dam	tuted a substantial ste der to cause Progressi	p toward the con ve Insurance Cor	nmission of said cri mpany to pay insur	me, to wit:	defend	lant made a	it least one materi	ally false, incomplete or

•				WANT PU	LICE CRIMINAL	COMPLAIN			
Docket Number: Date Filed:		ed:	OTN/LiveScan N	umber	Complaint/Incident Number				
	First:		Middle:	la	IF-2016-0248 Last:				
Defendant Name:	MELLON	Υ	Wildele.		CCULLOUGH				
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Statute Description (inc	lude the na	ame of statute	e or ordinance):						
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Lead? Offense#	Section	Subsection	PA Statute (1	itle) Counts	Grade NCIC Offense Cod	le UCR/NIBRS Code			
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Statute Description (inc	clude the n	ame of statut	e or ordinance):						
Acts of the accused as	sociated w	ith this Offen	se:						

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2016-0248
Defendant Name:	First: MELLONY	Middle:	Last: MCCULLOUGH

- 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 $\underline{\mathbf{1}}$ through $\underline{}$.
- 5. 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 that 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 issued attached)

issuing authority, and attached.)

(Date)

(Year)

AND NOW, on this date

9-5-18

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.

Wagisterial District Court Number

(Magisterial District Court Number)

(Issuing Authority)

SEAL

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2016-0248
Defendant Name:	First: MELLONY	Middle:	Last: MCCULLOUGH

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant is Anthony Ammaturo, Special Agent with the Pennsylvania Office of Attorney General (OAG), Bureau of Criminal Investigations, (BCI), Insurance Fraud Section. Your Affiant has over 30 years of law enforcement/criminal investigative experience, and being duly sworn according to law, deposes and says:
- B. The OAG received an Insurance Fraud Referral from Progressive Insurance Company, Special Investigative Unit, Investigator Brion Worley. Progressive Insurance Company alleged that Mellony McCullough, DOB 04/04/1976, 6020 W. Columbia Ave., Philadelphia, PA 19151, committed insurance fraud and attempted theft. Ms. McCullough is alleged to have filed a vandalism claim with Progressive Insurance Company for damages to her vehicle, which occurred before the inception of the Progressive policy. The vandalism claim consisted of someone pouring sugar in the gas tank of McCullough's vehicle. The following facts will show that Mellony McCullough has committed the offenses of Insurance Fraud, Criminal Use of a Communication Facility, and Criminal Attempt Theft by Deception.
- C. In connection with this investigation, your Affiant reviewed Progressive Insurance Company's claim file notes and recorded statements. Your Affiant also interviewed Progressive Insurance Company SIU Investigator Brion Worley in detail concerning the claim file. Based on the review of the file and the interviews, your Affiant ascertained the following:
- 1. On June 20, 2016, at 8:59 a.m., Eastern Standard Time, Ms. Mellony McCullough, DOB 04/04/1976, PA OLN 21343 695, of 6020 W. Columbia Ave., Philadelphia, PA 19151, purchased a Progressive Insurance personal automobile policy online. The policy number issued by Progressive Insurance was 910557446. The Progressive Insurance automobile policy was for Ms. Mellony McCullough's 2013 Dodge Dart, bearing Pennsylvania registration "JGK-5985".
- 2. On June 20, 2016, at 9:45 a.m., Eastern Standard Time, Doris McCullough called the Philadelphia Police Department to report the vandalism of two cars located 6020 W. Columbia Ave, Philadelphia, PA. Doris McCullough reported that someone put sugar in the gas tank of her car and her sister's car, Mellony McCullough. The police arrived and took separate incidents reports. Police Officer Williams took the report of Mellony McCullough. Mellony McCullough told Officer Williams that an unknown person poured sugar into her 2013 Dodge Dart's gas tank. Mellony McCullough told Officer Williams that the date of occurrence was between 10:00 p.m. on June 19, 2016, and 8:00 a.m. on June 20, 2016.
- 3. On June 20, 2016, at approximately 10:26 a.m., Eastern Standard Time, Ms. Mellony McCullough contacted Progressive Insurance by phone and on a recorded line filed a damage claim for her 2013 Dodge Dart, stating that someone poured sugar in her car's gas tank. McCullough stated that she notice the damaged at 9:45 a.m. Progressive Insurance issued claim number 16-4031097.
- 4. On June 22, 2016, at approximately 9:30 a.m., Eastern Standard Time, a representative of Progressive Insurance contacted Ms. Doris McCullough. Ms. Doris McCullough stated in a recorded conversation that she was visiting, and staying with her sister, Mellony McCullough, on June 20, 2016. Ms. Doris McCullough stated that Mellony called her between 8:00 and 8:30 in the morning of June 20, 2016, and stated her car would not start. At that time, Doris stated she was going to have Mellony use her car to go to work, and that is when they discovered sugar on the side of Doris' car, along with the gas cap on the ground. Doris McCullough stated that she believed Mellony had to be at work by 9:00 a.m. Doris McCullough's vehicle was insured by Progressive Insurance. At the conclusion of the interview, Doris McCullough stated to the Progressive Representative that all she is concerned about is getting her car fixed so that she can return to her home in Georgia, and that she is not going to lie to anybody.
- 5. On June 22, 2016, Ms. Mellony McCullough contacted Progressive Insurance by an email message, and stated the following: "Good morning, I am writing to tell you, I am closing my claim, and I will pay for any damages from the vandalizing of my car out of pocket, so do not contact anyone else, and close the claim. I do not authorize you to call anyone else off of my phone list."



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
	First:	Middle:	Last:
Defendant Name:	MELLONY		MCCULLOUGH

- D. On June 20, 2018, your Affiant sent a request to the Philadelphia Police Department for a copy of DC#16-19-056666, dated June 20, 2016. On June 26, 2018, your Affiant received a copy of the report; however, the correct DC# for the incident in question was DC#16-19-056665. On June 29, 2018, your Affiant responded to the Philadelphia Police Department's 19th District and interviewed Officer Moore #4960, and Officer Williams #3579. Your Affiant asked Officer Williams, #3579, to look at the DC Report that listed Mellony McCullough as the complainant. Officer Williams reviewed the report and stated that Mellony McCullough told him that the vandalism occurred between 10:00 p.m. on 6-19-16 and 8:00 a.m. on 6-20-16.
- E. On July 11, 2018, your Affiant conducted an interview with Mr. Brion Worley, SIU Progressive Insurance, at 5165 Campus Drive, Plymouth Meeting, PA regarding claim number 16-4031097. Mr. Worley confirmed that the Progressive policy associated with this claim was 910557446 in the name of Mellony McCullough. Mr. Worley stated that the policy was for Ms. Mellony McCullough's 2013 Dodge Dart, VIN 1C3CDFBA7DD247500, PA Registration "JGK-5985", and that the policy incepted at 8:59 a.m., Eastern Standard Time, June 20, 2016. Mr. Worley confirmed that according to the Philadelphia Police report, the incident occurred between 10:00 p.m. on June 19, 2016, and 8:00 a.m. on June 20, 2016, which was before the inception of the policy. Mr. Worley was also able to state that Progressive Insurance also insured Ms. Doris McCullough's vehicle and that Ms. Doris McCullough filed claim number 16-1430951 for the same incident of vandalism reported on June 20, 2016, to the Philadelphia Police Department. Ms. Doris McCullough's claim was paid on July 13, 2016, in the amount of \$2,995.22. Mellony McCullough's claim was canceled by her through an email on June 22, 2016. Mr. Worley stated that Mellony McCullough's claim was handled by the Progressive Insurance office located at 5165 Campus Dr., Suite 100, Plymouth Meeting, PA 19462. The Progressive's reserve amount set for Mellony McCullough's claim was \$1,888.00.
- F. On August 2, 2018, your Affiant interviewed Ms. Mellony McCullough. This interview took place in the lobby of the Sheraton Hotel, 201 N. 17th St., Philadelphia, PA 19103. Ms. McCullough was advised that the interview was in reference to her Progressive Insurance claim number 16-4031097, dated June 20, 2016. In the interview Ms. Mellony McCullough stated that she understood her Progressive Automobile Insurance policy did not become effective until June 20, 2016, at 8:59 a.m., Eastern Standard Time. Ms. McCullough stated that she did not know exactly when the vehicle had been vandalized; however, she stated that once she realized her vehicle had been vandalized, she contacted Progressive Insurance and purchased policy number 910557446 for her vandalized vehicle. Ms. McCullough then stated she filed the claim in question. Ms. McCullough also stated she cancelled the claim.
- I. Based on the detailed information contained in this criminal complaint, your Affiant requests a warrant of arrest be issued for Ms. Mellony McCullough for the appropriate violations of the Pennsylvania Crimes Code listed below:
 - 1. Title 18 PA C.S.A. 4117 (A) (2), Insurance Fraud (F-3).
 - 2. Title 18 PA C.S.A. 7512 (a), Criminal Use of Communication Facility (F-3).
 - 3. Title 18 PA C.S.A. 3922 (A) (1), Criminal Attempt/Theft by Deception (M-1).

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Docket Number:	Date Filed: OTN/LiveScan Numbe	OTN/LiveScan Number	Complaint/Incident Number IF-2016-0248
	First:	Middle:	Last:
Defendant Name:	MELLONY		MCCULLOUGH
Defendant Name:		Middle:	Last:

I, SPECIAL AGENT ANTHONY AMMATURO, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	If surveiler
Sworn to me and subscribed before me this day of	(Signature of Affiant)
Sworn to me and subscribed before me this Date	, Magisterial District Judge
My commission expires first Monday of January,	
	SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: MONTGOMERY **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 38-1-25 VS. MDJ: Hon. James P Gallagher DEFENDANT: (NAME and ADDRESS): Address: 128 W Fourth Street **SERGIO ROSS** WILLIAM First Name Bridgeport PA, 19473 Middle Name Last Name Gen 547 Hurst Street Bridgeport PA, 19405 Telephone: (610)277-3377 NCIC Extradition Code Type ☐ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Date Filed Docket Number 3-18 OTN/LiyeScan Number Complaint/Incident Number Request Lab Services? U 637587-6 1151 ☐ YES 🖾 NO IFS-2018-0177 **GENDER** ров 06/26/1970 POB Co-Defendant(s) Add'I DOB Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE White ■ Black Asian Native American Unknown ETHNICITY Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) ☐ PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) ☐ MUL (Multicolored) DNA **DNA Location** □ YES **⊠** NO WEIGHT (lbs.) **FBI Number MNU Number** 210 **Defendant Fingerprinted** ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 6 4 DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth. NCIC Veh. Code Reg. mat Ind. \square Plate # same as Sticker (MM/YY) Def. VIN Year Make Model Style Color Office of the attorney for the Commonwealth \(\subseteq \text{Approved} \) Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, of both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG ROBERT LABAR 10/11/2018 (Name of the attorney for the Commonwealth) Ignature of the attorney for the Commonwealth) (Date) SSA RICHARD BOWES 716704 #526 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (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

with violating the penal laws of the Commonwealth of Pennsylvania at [203]

(County Code)

[46]

therefore designated as John Doe or Jane Doe

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have

on or about MAY 18, 2018

AOPC 412A - Rev. 7/18

in MONTGOMERY County

19473

1029 Ford Street Bridgeport, Pa



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS-2018-0177
	First:	Middle:	Last:
Defendant Name:	SERGIO	WILLIAM	ROSS

- 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 $\underline{6}$.
- 5. 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 that 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.)

(Date)

(Date)

(Signature of Affiant)

AND NOW, on this date

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

(Magisterial District Court Number)

(Issuing Aythority)

SEAL



Statute Description (include the name of statute or ordinance): INSURANCE Acts of the accused associated with this Offense: Sergio Ross did, knowingly ar or cause to be presented a statement forminga part of, or in support of a claim that contain 05/18/2018 Sergio Ross submitted a false towing r.ecelpt in order to make it appear that Tr Inchoate	POLICE CRIMINAL COMPLAIN
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cts of the accused associated with this Offense:	



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS-2018-0177
Defendant Name:	First:	Middle:	Last:
	SERGIO	WILLIAM	ROSS

AFFIDAVIT of PROBABLE CAUSE

- A. You're Affiant, Special Agent Richard Bowes of the Insurance Fraud Section of the Pennsylvania Office of the Attorney General. Your Affiant has over 24 years of law enforcement experience, being duly sworn, deposes and says:
- B. Your Affiant was assigned to investigate an allegation of insurance fraud pertaining to the submission of false information regarding the repair of a vehicle involved in an auto accident and the subsequent insurance claim for that loss. The subject of this investigation is Sergio Ross, 06/26/1970, of 547 Hurst street Bridgeport, PA 19405. Ross is the owner of Combat Collision 1029 Ford street Bridgeport, PA 19405. Travelers Indemnity Company (Travelers), claim number# H9A3605001, date of loss was 05/14/2018. Ross provided false information to Travelers by submitting a false tow receipt from a fictitious towing company, S&R Towing, in the amount of \$420.00. The facts below provide probable cause to demonstrate Ross committed Insurance Fraud.
- C. Your Affiant reviewed documents given to him by Janene Hartlieb, a Special Investigator for Travelers Indemnity. Your Affiant then spoke to Janene Hartlieb. Based on the review of the file your Affiant learned the following:
 - 1. On 05/14/2018 at 3:50pm Stevenson Lake was involved in an auto accident on Route 202 at Route 252 in Tredyffrin Township.
 - 2. On 05/18/2018 as a result of the Accident Lake's car, 2014 Gray Ford Edge PA#KGE-9197, was not safe to drive and had to be towed. Jamison Towing provided a tow service from Lake's residence at 251 DeKalb Pike King of Prussia, PA 19406 to Combat Collision 1029 Ford street Bridgeport, PA 19405. The price of the tow was \$61.00 and was recorded on invoice #32315.
 - 3. When the tow truck was at Lake's Apartment, Lake took a picture of the truck that was towing his car. In the picture you are able to clearly make out the phone number for the business associated with the truck. The phone number came back to Jamison Towing.
 - 4. On 05/18/2018 Ross, owner of Combat Collision, submitted a tow bill for a tow of Lake's car for \$420.00, from S&R Towing Company located at 9 DeKalb Street Bridgeport, PA 19405. There was no pickup location on the bill. The bill was alleged to have been paid by check #10542 by Ross of Combat Collision.
 - 5. On 06/12/2018 Debbie Gray, claims adjuster with Travelers Indemnity, went to Combat Collision and spoke to Ross concerning the tow bill. When asked for the phone number to S&R Towing, Ross claimed to not know the number. Ross also could not produce a canceled check for the bill to prove payment. Gray then googled S&R Towing and could not find a listing and could not find the business at 9 DeKalb Street.
- D. Your Affiant was able to acquire a Tredyffrin Township Police Department Non-Reportable Accident report. Report #2018053276 prepared by P/O Carroll #63.
 - 1. The report confirms that Stevenson Lake was involved in an auto accident on 05/14/2018 at 3:50pm. The report stated that there was no tow required and no injuries were reported.
- E. On 09/21/2018 your Affiant interviewed Stevenson Lake inside his residence at 251 DeKalb Pike. Based on the interview your Affiant learned the following:
 - 1. Lake was involved in an auto accident on Route 202 on 05/14/2018 with a box truck.
 - 2. Lake was able to drive his vehicle back to his residence but then had it towed to the repair shop because he thought it was unsafe to drive.
 - 3. Lake stated that Jamison Tow Company towed his car to Combat Collision. Photos were taken of the tow truck while it was at his apartment.
 - 4. When asked if he ever heard of S&R Towing, Lake answered "NO".
- F. On 09/21/2018 your Affiant interviewed Renee Wanari who is the office manager for Jamison Towing. Wanari stated the following:
 - 1. On 05/18/2018 they towed a vehicle for Stevenson Lake to Combat Collision.



Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS-2018-0177
Defendant Name:	First:	Middle:	Last:
	SERGIO	WILLIAM	ROSS

- 2. I was provided a Tow receipt, invoice #32315, confirming the tow from 251 DeKalb Pike to Combat Collision 1029 Ford Street, for the amount of \$61.00.
- 3. When asked if they ever heard of S&R Towing, Wanari stated yes that is Sergio's not sure if he does towing.
- G. On 10/04/2018 your Affiant interviewed Sergio Ross, the owner of Combat Collision. Based on the interview your Affiant learned the following:
 - 1. Ross confirmed that his shop repaired a vehicle for Stevenson Lake.
 - 2. Ross stated he did not know how the car was brought into his shop or who did the towing.
 - 3. When asked for a copy of the tow receipt that he submitted for payment to the insurance company. Ross answered he would have to try to find it.
 - 4. Ross was asked for the canceled check that he used to pay the tow company, Ross stated that "I don't have one, never paid one".
 - 5. Ross was asked if he owned S&R Towing and that the towing that he claimed to have done was never done. Ross answered "Yes, what I do I add 30% to the towing bill when a company tows a car to me". Your affiant then asked about the address for S&R Towing, Ross stated that "No the lot was going to be mine anyway but I got screwed out of the lot. So it doesn't exist".
 - 6. Your Affiant then asked if the receipt that was submitted to the insurance company was made by him and Ross answered "Yes".
- H. Based on the foregoing, Your Affiant believes probable cause exists and that the following crimes have been committed by Sergio Ross:

18 PA. C.S.A. 4117(a) (2) Insurance Fraud (F3)

18 PA. C.S.A. 3922(a) (1) Criminal Attempt Theft by Deception (M1)

I, SSA RICHARD BOWES, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

		(Signature of Affiant)	
Sworn to me and subscribed before me this	/5 day of	Dctuber 2018	
Date	Mil	, Magisterial District Judge	
AOPC 4124 – Rev. 7/18	TO COMPANY SECTION OF A SECURITION OF COMPANY SECTION ASSESSED TO SECTION ASSESSED.	Page	of

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Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS-2018-0177
Defendant Name:	First: SERGIO	Middle: WILLIAM	Last: ROSS

My commission expires first Monday of January, $\partial\mathcal{O}\mathcal{I}\mathcal{A}$

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: MONTGOMERY **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 38-1-23 VS. (NAME and ADDRESS): MDJ: Hon. Deborah A. Lukens SHANTE **GARVIN** Address: 4002 Center Avenue DAVITA Last Name First Name Middle Name Gen Lafavette Hill, PA 19444 185 West Weaver Street, Philadelphia, PA 19119 Telephone: (610)828-5226 **NCIC Extradition Code Type** ☐ 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States □ Distance: ☐ 6-Felony Pending Extradition Determ. D-Misdemeanor No Extradition ☐ 2-Felony Limited ☐ A-Misdemeanor Full □ E-Misdemeanor Pending Extradition ☐ F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Complaint/Incident Number Docket Number Request Lab Services? OTN/LiveScan Number Date Filed YES NO IF 2017 0146 Co-Defendant(s) **GENDER** ров 08/06/1992 POB Add'l DOB ☐ Male First Name Middle Name Last Name Gen. AKA ⊠ Black RACE White Asian ■ Native American Unknown ETHNICITY Unknown Hispanic ■ Non-Hispanic BLU (Blue) PLE (Purple) BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) GRN (Green) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) Eye ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) Color MUL (Multicolored) XXX (Unknown) **DNA Location** WEIGHT (lbs.) DNA ☐ YES ☒ NO **FBI Number MNU Number** 125 M NO Ft. HEIGHT In. Defendant Fingerprinted ☐ YES Fingerprint Classification: 3 DEFENDANT VEHICLE INFORMATION State Comm'l Veh. School Veh. Oth. NCIC Veh. Code Reg. Haz Registration Ind. same as Plate # JZY4832 mat PA Sticker (MM/YY) Def. Color VIN Make Model Style Year \boxtimes WVGBG77L85D004385 2005 Jeep Grand Cherokee SW Tan Office of the attorney for the Commonwealth \(\subseteq \text{Approved} \) 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). SDAG DAVID AUGENBRAUN (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) SPECIAL AGENT JOHN A. TREVISAN JR. BADGE #546 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) 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 [224] 5165 Campus Drive, Suite 100 (Subdivision Code) (Place-Political Subdivision) Plymouth Meeting, Pa 19462 on or about NOVEMBER 30,2016 - APRIL 28,2017 in MONTGOMERY County **[46**]

(County Code)



							GO F	POLIC	CEC	RIMINAL	_ COMPLAINT
Docket Nu	ımber:	Date I	Filed:	ОТ	N/LiveScan	Numbe	r			aint/Incident I	Number
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Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number IF-2017-0146		
Defendant Name:	First: SHANTE	Middle: DAVITA	Last: GAR	VIN		

- 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 $\underline{7}$.
- 5. 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 that 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.)

0000BN 22, 20		SA	(Signature of Affiant)	igh.
(Date)	(Year)	0	(orginators or randing)	
AND NOW, on this date	10/23/18	I certify that the complaint has beer	n properly completed and	verified
An affidavit of probable cau	se must be completed before a war	rrant can be issued.		
38-1-23 (Magisterial District Court N	La Charles	Soral Rufus ng Authority)	. SEAL	

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2017-0146
Defendant Name:	First:	Middle:	Last:
Deferidant Name.	SHANTE	DAVITA	GARVIN

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant is John A. Trevisan Jr., a Special Agent employed by Pennsylvania Office of Attorney General (OAG), Bureau of Criminal Investigations (BCI), Insurance Fraud Section. Your Affiant has over twenty years of law enforcement / criminal investigation experience and being duly sworn according to law deposes and says:
- B. The Pennsylvania Office of Attorney General received a referral from Special Investigator Jason Truitte, of the Progressive Insurance Company, (Progressive), located at 5165 Campus Drive, Suite 100, Plymouth Meeting, PA 19462. Truitte alleges that a female subject identified as Shante Davita Garvin owned a 2005 Jeep Grand Cherokee bearing vehicle identification number 1J4HR58N05C575026. Garvin received the vehicle as a gift from a male subject identified as Yasin Zumar on 02-08-16. On that same date, Garvin obtained a Progressive automobile insurance policy for this vehicle. On 11-30-16, Garvin reported a claim to Progressive that her Jeep was parked, unattended at Haines Street and North Gratz Street in Philadelphia, PA on 11-29-16. Garvin stated that when she came out to her Jeep the next morning, she discovered that it had been damaged by a supposed hit and run driver.

Truitte determined through investigation and an interview with Garvin on 04/27/17, that the facts Garvin reported about when and where the accident occurred were false. Truitte's investigation and interview revealed that Garvin never had possession of the Jeep and it had always been in the possession of Zumar. Truitte learned that Zumar had told Garvin to fabricate the story about the vehicle being struck by a hit and run driver.

- C. In connection with this investigation, your Affiant reviewed the Progressive claim file and other documentation related to Garvin's claim. Your Affiant has also interviewed Truitte and reviewed the claim file with him. Based on the review of the file and interview of Truitte, your Affiant learned the following:
 - 1. On 02-08-16, Garvin received a 2005 Jeep Grand Cherokee bearing vehicle identification number 1J4HR58N05C575026 as a gift from a male subject identified as Yasin Zumar. Garvin insured this vehicle with Progressive under policy number 908811123 on 02-08-16.
 - 2. On 11-30-16, Garvin filed a claim via telephone with Progressive, which was assigned claim number 16-4862280. Garvin stated to Progressive representatives that her Jeep was damaged during the overnight hours between 11-29-16 and 11-30-16. The damage to Garvin's vehicle supposedly occurred while it was parked unattended at Haines and North Gratz Streets in Philadelphia, PA. According to Garvin, the striking vehicle hit the Jeep in the rear causing major damage. Garvin stated the striking vehicle fled the scene of the accident and there were no witnesses to the accident.
 - 3. Progressive contracted the services of accredited Traffic Accident Reconstructionist, William J. Martin, of WJM Technical Accident Services, to evaluate the circumstances of the claim filed by Garvin. Martin examined detailed photographs of the damage to Garvin's Jeep and reviewed other information and concluded that the damage was inconsistent with the facts as reported by Garvin. In a report dated 03-02-17, Martin stated that the damage to the Jeep could not have been caused by another vehicle striking it while it was parked.
 - 4. On 04-27-17, Truitte met with Garvin at his office, located at 5165 Campus Drive Plymouth Meeting, PA 19462, to interview her regarding her claim. During the interview, Garvin repeated the same account of the accident that she had provided during her initial claim call to Progressive. Truitte pointed out inconsistencies in Garvin's version of events of the accident. When confronted with these inconsistencies, Garvin admitted that she had lied about the facts of the accident and how the damage to the vehicle had occurred. In addition, Garvin admitted that she never drove the vehicle and the vehicle was never in her possession. Garvin stated she gave the false statement regarding.



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Defendant Name:	SHANTE	DAVITA	GARVIN		

the damage to the Jeep, because she was instructed to do so by Zumar. Garvin was in a relationship with Zumar at that time and he had possession of the vehicle at all relevant times.

- 5. Progressive deemed the vehicle a total loss and assessed the value of the vehicle to be \$5,310. On 04/28/17, Garvin withdrew the claim.
- D. On 09-05-18, your Affiant spoke with Martin regarding his analysis of damage to Garvin's Jeep. Martin stated that the damage to the Jeep could not have been caused by another vehicle striking it while it was parked. In Martin's opinion, the damage was caused by the Jeep backing up into a horizontal pole or possibly a loading dock. Martin pointed out that the cylindrical shape of the damage and the height of the damage was not consistent with another vehicle having caused it.
- E. Your Affiant requested and received from the Pennsylvania Department of Transportation, a certified copy of the title history for the 2005 Jeep Grand Cherokee bearing Pennsylvania registration number, JZY4832 and vehicle identification number, 1J4HR58N05C575026. The title history shows that Zumar purchased this vehicle on 03-02-15 from the Gold Coast Auto Brokers Incorporated. The title history further shows that Garvin was given the Jeep as a gift from Zumar on 02-08-16 and it was insured by Garvin with Progressive under policy number 9088111230 on 02-08-16. An Affidavit of Gift signed by Zumar and Garvin was included in the title history.
- F. On 09-21-18, your Affiant conducted an interview with Shante Garvin at her residence located at 185 West Weaver Street, Philadelphia, PA 19119. The following is a synopsis of the interview:

Garvin owned a 2005 Jeep Grand Cherokee on 11-30-16, when she reported a claim for damages to that vehicle to Progressive. Garvin said she was given the Jeep as a gift by Zumar. Garvin was involved in a relationship with Zumar at the time she received the Jeep on 02-08-16. Although the Jeep was titled, registered and insured in Garvin's name, she never drove it or had possession of it. According to Garvin, Zumar retained possession of the Jeep.

Garvin admitted that, on 11-30-16, she made the claim to Progressive under the guidance of Zumar. Zumar told her to lie about the circumstances of the accident. Garvin further admitted that the story that the Jeep was damaged while parked at her girlfriend's residence during the overnight hours of 11-29-16 into the morning of 11-30-16 was not true. Garvin said she fabricated this story under the direction of Zumar. Zumar did not give Garvin a legitimate reason why he wanted her to fabricate this story. Garvin said she was aided in fabricating her story regarding the damage to the vehicle by viewing a photograph of the damage provided to her by Zumar. Garvin did not know when or how the vehicle was damaged and Zumar never advised her as to how the vehicle was actually damaged.

G. The preceding facts provide probable cause to charge Shante Davita Garvin with the following crimes:

18 Pa C.S.A. §4117 (a) (2) Insurance Fraud (F3)
18 Pa C.S.A. §901 / §3922 (a) (1) Criminal attempt / Theft by Deception (F3)
18 Pa C.S.A. §7512 (a) Criminal Use of Communication Facility (F3)
18 Pa C.S.A. §903 (a) Criminal Conspiracy / Insurance Fraud (F3)

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Docket Number:	Date Filed:	OTN/LiveScan Number	r Complaint/Incident Number IF-2017-0146
Defendant Name:	First:	Middle:	Last:
	SHANTE	DAVITA	GARVIN

I, SPECIAL AGENT JOHN A. TREVISAN JR., 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	OH Sohn H. Merson	rt
	(Signature of Affiant)	/
Sworn to me and subscribed before me this	- Oct	2018
Date though hiles	, Magisterial District Ju	ıdge
My commission expires first Monday of January,	-	
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•			P	OLICE	CRIMINAL	COMPLAINT
Docket Number:	Date Filed:	OTN/LiveScan	Number	-	olaint/Incident N 017-0141	umber
Defendant Name:	First: SHIRAH	Middle:		Last: GIST		
When there is more that (Set forth a brief summary of without more, is not sufficien. The age of the victim at the t	an one offense, each the facts sufficient to the int a summary case, the time of the offense may	escribed below with each offense should be nun advise the defendant of the nat you must cite the specific sections in additional blished, list only the last four di	nbered chronolo ture of the offense(s ion(s) and subsection, social security i	ogically. s) charged. A con(s) of the standard and f numbers and f	citation to the statu atute(s) or ordinanc inancial information	te(s) allegedly violated, e(s) allegedly violated.
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Lead? Offense Se	ection Subsection	on PA Statute (Title) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
(if applicable)	Accident Number		☐ Interstate		Safety Zone	☐ Work Zone
Statute Description (inc	clude the name of	statute or ordinance): INS	URANCE FRAUD			
thing material to the claim, to	o wit: The defendant m enefits, which Safe Auto	of, or in support of, a claim wh nade at least one materially fals to was not obligated to pay, in c	e, incomplete or mi	sleading state:	ment in order to ca	use Safe Auto Insurance
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Lead? Offense# Se	ection Subsection	on PA Statute ((Title) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
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an act which constituted a su statement in order to cause !	ibstantial step toward t Safe Auto Insurance Co	Offense: The defendant did, which commission of said crime, to pay insurance benefican automobile accident, that occ	o wit: Gist made at its in excess of \$2,0	least one mate 00, which Safe	erially false, incomp e Auto was not oblig	lete or misleading gated to pay, in

POLICE CRIMINAL COMPLAINT Complaint/Incident Number OTN/LiveScan Number Date Filed: Docket Number: IF-2017-0141 First: Middle: Last: Defendant Name: SHIRAH **GIST** Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older _ 18 903 Offense 18 901 A 18 902 A F-3 1 of the 4 7512 18 (a) PA Statute (Title) NCIC Offense Code UCR/NIBRS Code Offense# Subsection Counts Grade Lead? Section PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone Number (if applicable) Statute Description (include the name of statute or ordinance): CRIMINAL USE OF COMMUNICATION FACILITY Acts of the accused associated with this Offense: Defendant used a communication facility, a telephone or cellphone, to commit, cause, or facilitate the commission or the attempt thereof of a crime which constitutes a felony, to wit: The defendant used a telephone or cellphone to submit false information regarding a fraudulent insurance claim to Safe Auto Insurance Company, with the intent to commit insurance fraud. ☐ Conspiracy Inchoate ☐ Solicitation ☐ Attempt Number of Victims Age 60 or Older 18 903 Offense 18 901 A 18 902 A of the UCR/NIBRS Code PA Statute (Title) **NCIC Offense Code** Offense# Subsection Counts Grade Lead? Section PennDOT Data Accident ☐ Interstate ☐ Work Zone ☐ Safety Zone Number (if applicable) Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense:

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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
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Number of Victims Age 60 or Older ___

☐ Conspiracy

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☐ Attempt

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Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2017-0141
Defendant Name:	First: SHIRAH	Middle:	Last: GIST

- 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 $\underline{\hspace{1cm}}$.
- 5. 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 that 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.)

(Date)	(Year)	Sa Free (Sig	nature of Affiant)	m		
AND NOW, on this date		l certify that the complaint has been properly completed and verif				
An affidavit of probable cause must		Atul 10/2418				
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Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number IF-2017-0141	
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Defendant Name:	SHIRAH		GIST	•	

AFFIDAVIT of PROBABLE CAUSE

- A) Your Affiant is Grace E. Wischum, Special Agent with the Pennsylvania Office of Attorney General (OAG); Bureau of Criminal Investigation (BCI), Insurance Fraud Section. Your Affiant has over (37) years of law enforcement/criminal investigative experience and being duly sworn according to law deposes and says:
- B) The Office of Attorney General (OAG) received an insurance fraud referral from Safe Auto Insurance Company (Safe Auto), Special Investigator Nicole Barnes (Barnes). Barnes alleged that Shirah Gist (Gist), DOB 03/08/1990, residing at 1743 W. Erie Avenue, Philadelphia, Pennsylvania, Apartment #2 was involved in a two vehicle automobile accident and then purchased insurance after the accident occurred. Safe Auto set a reserve aside in the amount of \$4,600. The facts below provide probable cause to believe that Gist committed Insurance Fraud, Criminal Attempt Theft by Deception, and Criminal Use of Communication Facility.
- C) In connection with this investigation your Affiant reviewed Safe Auto's claim file. Your Affiant then interviewed Safe Auto Special Investigator, Troy Hayes (Hayes), who is now assigned to the case, and reviewed the file with him. Based on the review of the file and an independent investigation, your Affiant learned the following:
 - 1. On May 6, 2017, at approximately 12:10 am, Gist was involved in an automobile accident where she hit a parked vehicle. The Philadelphia Police responded to the accident, which occurred in the 200 block of W. Allegheny Avenue. P/O Valentine # 4446, took a report and documented it on an accident report under DC No. 17-25-036797. The time of the accident recorded on the report was 12:10 am.
 - 2. On May 6, 2017, at 1:22 am, while at her home in Philadelphia, Pennsylvania, Gist purchased an automobile insurance policy with Safe Auto Insurance, via the Safe Auto Insurance Website. Gist answered "NO" to the questions on the application that asked whether she had been in an accident in the past five years and if there was any prior damage to the vehicle.
 - 3. On May 6, 2017, at approximately 7:12 am, Gist called Safe Auto to file a claim. Gist was told that the claim department was not open and to call back later when it was.
 - 4. On May 6, 2017, at approximately 12:21 pm, Gist called Safe Auto back to file a claim. Gist told the claim representative that the accident occurred between 10:30 am and 11:00 am that morning.
 - 5. On October 15, 2018, your Affiant interviewed Jose Garcia (Garcia) by phone. Garcia stated that his vehicle was parked in the 200 block of W. Allegheny Avenue in Philadelphia, Pennsylvania when it was struck by a Jeep Compass driven by Gist. Garcia stated that the accident occurred on May 6, 2017 at around midnight. Garcia told your Affiant that he took pictures and obtained a video of the accident from a business on the corner of Allegheny Avenue. Garcia forwarded the video and pictures to your Affiant. Your Affiant reviewed the video sent by Garcia, and the video is date and time stamped. The date and time imbedded in the video, which shows the accident, is May 6, 2017, at 12:09 am.

Docket Number:	Date Filed:	OTN/LiveScan Numbe	r	Complaint/Incident Number IF-2017-0141	
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Defendant Name:	SHIRAH	-	GIST		

- 6. On October 16, 2018, your Affiant, recorded an interview with Gist, with her permission, in the presence of SA Joseph Jonas. Gist admitted that she purchased insurance with Safe Auto on May 6, 2017, after the accident had occurred and then filed a claim against that policy.
- D) Based on the foregoing, your Affiant concludes that there is probable cause to believe that Shira Gist has committed the following crimes:

18 Pa. C.S.A. §4117(a) (2) Insurance Fraud [F-3]

18 Pa. C.S.A. §4117 (b) (4) Insurance Fraud [M-1]

18 Pa. C.S.A. §901 / §3922(a) (1) Criminal Attempt / Theft by Deception [F-3]

18 Pa .C.S.A. §7512(a) Criminal Use of Communication Facility [F-3]

I, SA GRACE WISCHUM, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	M There Wear have (Signature of Affiant)
Sworn to me and subscribed before me this day of	:
Date	// 🐔 , Magisterial District Judge
My commission expires first Monday of January,	SEAL

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA **COMMONWEALTH OF PENNSYLVANIA** COUNTY OF: PHILADELPHIA VS. Magisterial District Number: (NAME and ADDRESS): MDJ: Hon. FIGUEROA TYESHA Address: 1301 Filbert Street Last Name Gen Middle Name First Name Philadelphia, PA 19102 115 West Allegheny Avenue Apt 3 Philadelphia, PA 19133 Telephone: (215)683-7283 NCIC Extradition Code Type ☐ C-Misdemeanor Surrounding States ☐ 5-Felony Pending Extradition Distance: 1-Felony Full □ D-Misdemeanor No Extradition ☐ 6-Felony Pending Extradition Determ. 2-Felony Limited ☐ E-Misdemeanor Pending Extradition ☑ 3-Felony Surrounding States A-Misdemeanor Full F-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited ☐ 4-Felony No Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Complaint/incident Number Date Filed OTN/LiveScan Number Docket Number ☐ YES ☐ NO IF-2017-0149 Co-Defendant(s) Add'l DOB ров 02/27/1990 POB **GENDER** Last Name Gen. Middle Name First Name ■ Male AKA Black ☐ Unknown Native American Asian White ■ RACE Unknown Hispanic Non-Hispanic **ETHNICITY** BRO (Brown) BLU (Blue) PLE (Purple) SDY (Sandy) RED (Red/Aubn.) GRY (Gray) Hair PNK (Pink) GRN (Green) XXX (Unk./Bald) ONG (Orange) WHI (White) BLK (Black) Color BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BRO (Brown) BLU (Blue) BLK (Black) Eye MAR (Maroon) PNK (Pink) XXX (Unknown) HAZ (Hazel) Color WEIGHT (lbs.) **DNA Location** ☐ NO DNA ☐ YES 230 FBI Number **MNU Number** Ft. HEIGHT in. ☐ YES ☐ NO Defendant Fingerprinted 6 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth. NCIC Veh. Code Reg. Comm'l Veh. School Veh. Registration State Haz same as Ind. 🔲 mat Sticker (MM/YY) Plate # Def. Color Make Model Style Year VIN Office of the attorney for the Commonwealth Approved Disapproved because: or both be approved by the attorney for the Commonwealth prior to (The attorney for the Commonwealth may require that the complaint, arrest warrant affiday) filing. See Pa.R.Crim.P. 507). SDAG KENNETH MCDANIELS (Name of the attorney for the Commonwealth) 711765 BADGE #535 SPECIAL AGENT PAUL BLASH (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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 115 West Allegheny Avenue with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Place-Political Subdivision) (Subdivision Code) Philadelphia, Pa 19133 on or about 05/10/2017 THRU 05/11/2017 in PHILADELPHIA County [51] (County Code)



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Acts of the accused associated with this Offense: The defendant, with intent to commit the crime of Theft by Deception, 18 Pa. C.S.A. 3922(a), committed an act which constituted a substantial step towards the commission of that crime, to wit: defendant made at least one materially false, incomplete or misleading statement in order to cause Progressve Insurance to pay insurance benefits of \$1,655.00, which Progressive was not obligated to pay, in connection with damage to an auto that occurred on April 29,2017.														
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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2017-0149		
Defendant Name:	First:	Middle:	Last: FIGUEROA		
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- 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 $\underline{\hspace{1cm}}$.
- 5. 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 that 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.)

(Date) I certify that the complaint has been properly completed and verified. AND NOW, on this date An affidavit of probable cause must be completed before a warrant can be issued. (Issuing Authority) (Magisterial District Court Number) SEAL

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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2017-0149
Defendant Name:	First: TYESHA	Middle:	Last: FIGUEROA

AFFIDAVIT of PROBABLE CAUSE

- A. Your Affiant is Special Agent Paul Blash of the Insurance Fraud Section of the Pennsylvania Office of Attorney General. Your Affiant has thirty two years of law enforcement/investigative experience, and being duly sworn, your Affiant deposes and says:
- B. Your Affiant was assigned to investigate an allegation of insurance fraud regarding false and misleading information provided by Tyesha Figueroa to Progressive Insurance Company (Progressive). Figueroa obtained an auto insurance policy on 04/29/2017 at 9:12 pm, after she was involved in a rear end accident. Progressive's records show Figueroa called them on 05/10/2017 to report the accident. Figueroa told Progressive the accident occurred on 04/29/2017 during the evening hours after she'd obtained the automobile insurance policy from Progressive. This case was referred to the Pennsylvania Office of Attorney General by Jessica Treese, Special Investigator for Progressive Insurance. Based on the following Affidavit, there is probable cause to believe Tyesha Figueroa committed the crimes of Insurance Fraud, Criminal Use of a Communication Facility, and Criminal Attempt Theft by Deception.
- C. On 08/23/2018, your Affiant reviewed the Progressive claim file and interviewed Jessica Treese from Progressive Insurance Special Investigations Unit. Based on the review of the file and the interview of Jessica Treese, your Affiant learned the following:
 - 1. Tyesha Figueroa (date of birth: 02/27/1990) resides at 115 West Allegheny Avenue Apt 3 Philadelphia, PA, 19133. On 04/29/2017, at 9:12 pm Figueroa purchased a progressive automobile insurance policy, number 914693032, via the internet. The policy was issued for Figueroa's 2006 Mazda MPV Sports Van bearing Pennsylvania registration JSR-0019, and vehicle identification number, JM3LW28A060566101.
 - 2. On 05/10/2017, in a recorded statement, Figueroa called Progressive and submitted a claim on her automobile insurance policy. Figueroa claimed that while driving her 2006 Mazda, another vehicle struck her from behind. Figueroa told Progressive the accident occurred on 04/29/2017 but was uncertain as to the exact time. Progressive assigned claim number 172824004 to Figueroa's claim. Figueroa's claim was denied by Progressive on 05/19/2017. Progressive had set a reserve amount of \$1,655.00 for Figueroa's claim.
 - 3. On 05/11/2017, Progressive recorded an audio statement from Figueroa regarding her claim for an automobile accident on 04/29/2017. Figueroa was vague when asked about the time of the accident. Figueroa told Progressive that the accident occurred after she purchased the automobile policy.
 - 4. Progressive obtained a copy of the Cherry Hill Police Department accident report, number 17-033922. The report indicated that Figueroa was operating her 2006 Mazda on 04/29/2017 at 6:55p.m. when it was struck from behind by a 1999 Lincoln operated by Arshak Zeytunyan.
- D. On 08/17/2018, your Affiant interviewed Officer Robert Daniello #350 of the Cherry Hill Police Department. Officer Daniello responded to the auto accident on 04/29/2017 at 6:55 pm and prepared report number 17-0033922. Daniello stated Figueroa did not have proof of insurance and did not produce an insurance card at the time of the accident.



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Defendant Name:	First:	Middle:	Last: FIGUEROA			

E. On 08/31/2018, your Affiant interviewed Tyesha Figueroa. Figueroa stated the following during the interview:

Figueroa admitted that she was involved in a motor vehicle accident on 04/29/2017 at 6:55 p.m. and that the accident occurred in Cherry Hill, New Jersey. Figueroa admitted that her automobile policy had lapsed at the time of the accident on 04/29/2017 and that she purchased her Progressive automobile policy after the accident. Figueroa stated that the policy was issued to her at her address of 115 West Allegheny Avenue, Philadelphia, PA. Tyesha Figueroa said she filed a claim on 05/10/2017 with Progressive Insurance for the accident. Figueroa also admitted that she falsely told Progressive that the accident occurred after she purchased the policy and stated that she was sorry for doing that. Figueroa provided your Affiant with a written statement to the above listed information.

F. Based on the foregoing, your Affiant concludes that probable cause exists that Tyesha Figueroa committed the following crimes:

18 PA C.S.A. §4117 (a) (2) Insurance Fraud (F-3)

18 PA C.S.A. §3922 (a) (1) Criminal Attempt / Theft by Deception (M-1)

18 PA. C.S.A. §7512(a) Criminal Use of Communication Facility (F3)

I, SPECIAL AGENT PAUL BLASH, 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

	Hart Slow
	(Signature of Affiant)
Sworn to me and subscribed before me this day of	Oct 2018
Date UWCuc	, Magisterial District Judge ACM
My commission expires first Monday of January, 2021	
	SEAL